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1. RECEIVED IN ENFORCEMENT: 02/28/2022

Subject: Combined NESHAP Initial Report, 8-34 Semi-Annual Report, Title V Semi-Annual Monitoring Report and SSM Plan Report, and Title V Annual Compliance Certification Newby Island Landfill, Milpitas, California (Title V Facility No. A9013)

Dear Sir or Madam:

International Disposal Corp of CA (IDCC) is pleased to submit the enclosed combined National Emission Standards for Hazardous Air Pollutants (NESHAP) Initial Report, Bay Area Air Quality Management District (BAAQMD), Regulation 8, Rule 34 Semi-Annual Report, Semi-Annual Startup, Shutdown and Malfunction (SSM) Plan Report, Title V Semi-Annual Monitoring Report and Title V Annual Compliance Certification to the BAAQMD and the U.S. Environmental Protection Agency (USEPA) Region IX for the Newby Island Landfill (Newby). The Title V Semi-Annual Monitoring Report, the BAAQMD Rule 8-34 Semi-Annual Report, and the SSM Plan Report covers the period from August 1, 2021 through January 31, 2022. The Initial NESHAP report covers the period from September 27, 2021 to January 31, 2022. The Title V Annual Compliance Certification covers the period from February 1, 2021 through January 1, 2022.

The Title V reports meet the requirements specified in the Title V Permit, BAAQMD guidance on Title V report submittals, and BAAQMD Regulation 2, Rule 6. The BAAQMD Rule 8-34 report includes the information required by BAAQMD Rule 8-34-411 and also satisfies the requirements under the New Source Performance Standards (NSPS) for municipal solid waste landfills (40 Code Federal of Regulations [CFR] Part 60, Subpart WWW), including 40 CFR 60.757(f). The Semi-Annual SSM Plan Report satisfies the requirements under the NESHAP rule for semi-annual reporting of SSM Plan implementation including 40 CFR 63.10(d)(S). The Title V reports and the SSM Plan report each includes a certification by the responsible official for Newby.

In addition, the updated NESHAP rule went into effect on September 27, 2021, removing SSM Plan requirements. As there are still SSM Plan references in Newby's Title V Permit, Newby will comply with the SSM reporting requirements.

If you have any questions regarding this submittal, please do not hesitate to call me at (408) 586-2263 or email me at RHuber2@republicservices.com.

Sincerely,

Rachelle Huber
Environmental Manager
Newby Island Landfill

NESHAP Initial Report/NSPS/BAAQMD Rule 8-34
Semi-Annual Report, SSM Plan Semi-Annual
Report, and Title V Semi-Annual Report
Newby Island Landfill
Milpitas, California (Facility No. 9013)

Prepared for:



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For Submittal to:

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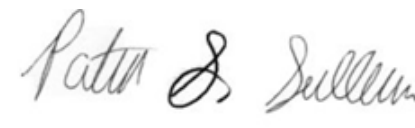
This submittal consisting of the National Emission Standards for Hazardous Air Pollutants (NESHAP) Initial Report/New Source Performance Standards (NSPS)/Bay Area Air Quality Management District (BAAQMD) Rule 8-34 Semi-Annual Report, the Semi-Annual Startup, Shutdown, and Malfunction Plan Report, and the Title V Semi-Annual Monitoring Report for the Newby Island Landfill in Milpitas, California, dated February 2022, was prepared and reviewed by the following:



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SECTION I. NESHAP INITIAL/NSPS/BAAQMD RULE 8-34 SEMI-ANNUAL REPORT

1.0 INTRODUCTION

On behalf of the International Disposal Corporation of California (IDCC), SCS Engineers (SCS) hereby submits this Initial National Emission Standards for Hazardous Air Pollutants (NESHAP) Report, New Source Performance Standard (NSPS), 40 Code of Federal Regulations (CFR) Part 60, Subpart WWW/Bay Area Air Quality Management District (BAAQMD or District) Rule 8-34 Semi-Annual Report and Semi-Annual Start-up, Shutdown, and Malfunction (SSM) Plan Report for the period of August 1, 2021 through January 31, 2022 to the BAAQMD for the Newby Island Sanitary Landfill and Recyclery (Newby).

This Semi-Annual report also meets the requirements of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for MSW landfills, 40 CFR 63, Subpart AAAA and complies with the requirements specified in Newby's Title V permit.

Due to the site's permitted design capacity being over the 2.5 million Megagram/2.5 million cubic meter limits and having an uncontrolled non-methane organic compound (NMOC) content exceeding 50 Megagrams per year, the major compliance provisions of Subparts XXX and WWW were replaced as of September 27, 2021 by the NESHAP 40 CFR 63, Subpart AAAA requirements, which essentially implement and enhance provisions of 40 CFR 60, Subparts XXX (which were updated NSPS for Municipal Solid Waste (MSW) landfills promulgated in 2016) as well as removing the Startup, Shutdown, Malfunction (SSM) Plan requirements. However, because the Title V Permit references Subpart WWW, this semi-annual report will continue to include Subpart WWW requirements. A separate annual Subpart XXX report will also be submitted. References to Subpart WWW will be removed from all reports after a new Title V Permit is issued removing references to Subpart WWW and updating applicable regulations, or we otherwise obtain approval from the BAAQMD to only comply with the new requirements.

This Semi-Annual report includes a certification signed by a Responsible Official which is provided in **Appendix A**. In accordance with the NESHAP for Landfills, this report is submitted semi-annually.

The Semi-Annual Report pertains to the landfill gas (LFG) collection and control system (GCCS) operated at Newby.

This report includes the following information, as required by BAAQMD Rule 8-34-411:

- All collection 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 of the requirements of this Rule (8-34-501.4).
- Monthly LFG 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).
- Landfill surface monitoring, location of excesses, excess concentration, date discovered, actions taken to repair the excess, and re-monitored concentrations (8-34-501.6 and 506).
- 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).
- Well head monitoring including gauge pressure, LFG temperature, and LFG oxygen concentration (8-34-501.9 and 505).
- Continuous flow monitoring (8-34-501.10).

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

2.0 SITE BACKGROUND INFORMATION

Newby is a MSW landfill located in Milpitas, California and is owned and operated by IDCC. The municipal refuse disposal site is located in Santa Clara County on the western terminus of Dixon Landing Road. The 342-acre landfill began accepting waste circa 1930 and is currently in operation.

Newby is subject to NSPS Subpart XXX since it commenced construction, reconstruction, or modification after July 17, 2014. Pursuant to NSPS Subpart XXX, Newby was required to initiate GCCS operations, including associated monitoring, recordkeeping, and reporting, on September 4, 2019 (30 months after the submittal of the NMOC Emissions Rate Report). For ease of recordkeeping, Newby elected to begin reporting effective September 1, 2019. However, due to potentially overlapping requirement, Newby is continuing to report semi-annually under the existing Title V which includes NSPS Subpart WWW requirements and Rule 8-34.

2.1 EXISTING AIR PERMITS

Newby maintains a BAAQMD Permit to Operate (PTO) (Plant No. 9013), which includes conditions for the wellfield, collection system, and A-2 and A-3 Flare stations (Condition No. 10423). This condition incorporates all applicable requirements from NSPS Subpart WWW and from BAAQMD Rule 8-34, which are addressed in this report. Newby also maintains a Title V Permit (Facility No. A9013), which expired on December 20, 2017. On June 20, 2017, a Title V Renewal Application was submitted to the BAAQMD. The site currently operates under an application shield. On November 30, 2021, Mr. Dennis Jang with the BAAQMD informed IDCC that the renewal application (A/N 28723) is open and in process and another renewal application will not be needed.

A GCCS Design Plan was prepared for the site to review and determine the adequacy of the existing LFG system. The current design of the system was determined to be adequate to comply with both NSPS and BAAQMD Rule 8-34 requirements. The system design is based on the density of wells calculated to sufficiently extract the maximum flow of LFG generated, according to the United States (U.S.) Environmental Protection Agency (USEPA) LFG emissions model (LandGEM). The GCCS is

designed to control surface emissions, as well as to minimize subsurface lateral migration of LFG. Both the perimeter of the landfill and the landfill surface are monitored on a quarterly basis.

Additional details regarding the GCCS are in the GCCS Design Plan that was previously submitted to the BAAQMD. A drawing showing the existing GCCS is provided in **Appendix B**.

2.2 EXISTING LANDFILL GAS COLLECTION AND CONTROL SYSTEM

The GCCS at Newby consists of extraction wells used to collect the LFG from within the landfill (the “wellfield”) and a piping system (the “collection system”) used to convey the collected LFG to the control systems for destruction. The LFG is extracted from the landfill through a combination of vertical gas extraction wells and horizontal gas extraction trenches/pipes, as well as leachate collection system components. All landfill gas is controlled by one of more of the following means: The A-2 and A-3 Flares or the IC engine power generators operated by the San Jose/Santa Clara Water Pollution Control Plant (Facility #A778).

A diagram of the GCCS displaying system component locations is shown in the site plan(s) provided in **Appendix B**.

3.0 MONITORING AND RECORDS

This NSPS Semi-Annual Report for Newby is being submitted to the BAAQMD and USEPA in compliance with 40 CFR Subpart WWW (“NSPS”), including 40 CFR 60.757(f), which describe the items to be submitted in an annual report for landfills seeking to comply with NSPS using an active collection system. In compliance with 40 CFR 63, Subpart AAAA (NESHAP for MSW Landfills), this report is submitted semi-annually.

Please note, the Newby is subject to the 40 CFR Subpart XXX (New NSPS) by commencing construction on its approved expansion. The references in this report notes Subpart WWW and Subpart XXX.

Newby is also subject to the new 40 CFR Subpart AAAA (NESHAPs), which went into effect on September 27, 2021, at which time the SSM reporting requirements no longer apply. However, as the SSM requirements are still noted in the Title V Permit, the SSM report has not been closed out as of the submittal of this report.

This section of the report represents the Semi-Annual Monitoring Report and covers the items required to be reported in the applicable rules under 40 CFR Part 60, Subpart WWW, 40 CFR Part 60, Subpart XXX, and 40 CFR Part 63, Subpart AAAA. The reporting period is from August 1, 2021 to January 31, 2022. The table below summarizes the corresponding sections for the regulatory references addressed in this report:

Corresponding Regulatory References

Section	Emission Guideline Subpart Cc (NSPS Subpart WWW)	NSPS Subpart XXX	Updated NESHAP Subpart AAAA
Pressure Requirements	40 CFR 60.753(b)	40 CFR 60.763(b)	40 CFR 63.1958(b)
Temperature and Oxygen Requirements	40 CFR 60.753(c)	40 CFR 60.763(c)	40 CFR 63.1958(c)
Corrective Action Analysis	--	40 CFR 60.767(g)(7)	40 CFR 63.1981(h)(7)
Enhanced Monitoring	--	--	40 CFR 63.1981(h)(8)

Section	Emission Guideline Subpart Cc (NSPS Subpart WWW)	NSPS Subpart XXX	Updated NESHAP Subpart AAAA
Surface Emissions Monitoring	40 CFR 60.753(d)	40 CFR 60.763(d)	40 CFR 63.1958(d)
Venting to Control System	40 CFR 60.753(e)	40 CFR 60.763(e)	40 CFR 63.1958(e)
Cover Integrity	40 CFR 60.755(c)(5)	40 CFR 60.765(c)(5)	40 CFR 63.1960(c)(5)
Enclosed Flare	40 CFR 60.756(b)	40 CFR 60.766(b)	40 CFR 63.1961(b)
Open Flare	40 CFR 60.756(c)	40 CFR 60.766(c)	40 CFR 63.1961(c)
Other Control Device	40 CFR 60.756(d)	40 CFR 60.766(d)	40 CFR 63.1961(d)
Exceedances	40 CFR 60.757(f)(1)	40 CFR 60.767(g)(1)	40 CFR 63.1981(h)(1)
Gas Stream Diverted	40 CFR 60.757(f)(2)	40 CFR 60.767(g)(2)	40 CFR 63.1981(h)(2)
Control Device Downtime	40 CFR 60.757(f)(3)	40 CFR 60.767(g)(3)	40 CFR 63.1981(h)(3)
Collection System Downtime	40 CFR 60.757(f)(4)	40 CFR 60.767(g)(4)	40 CFR 63.1981(h)(4)
3-Hour Temperature	40 CFR 60.758(c)(1)(i)	40 CFR 60.768(c)(1)(i)	40 CFR 63.1983(c)(1)(i)
Additional Surface Emissions Monitoring	40 CFR 60.757(f)(5)	40 CFR 60.767(g)(5)	40 CFR 63.1981(h)(5)
Well Expansion	40 CFR 60.757(f)(6)	40 CFR 60.767(g)(6)	40 CFR 63.1981(h)(6)
Source Test	--	--	--
Liquids Reporting	--	40 CFR 60.767(k)	--
24-Hour High Temperature	--	--	40 CFR 63.1981(k)

3.1 CONTINUOUSLY MONITORED PARAMETERS

According to BAAQMD Rule 8-34-301.1, the GCCS must be operated continuously. To comply with this requirement, the landfill owner/operator is required to maintain full-time operation of the LFG collection system and control devices, as well as individual extraction wells. 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 review at the site.

3.1.1 Gas Extraction System Downtime

All collected gases were conveyed to the flare station control system. The flare station is equipped with an automatic shutdown and alarm system that powers down the specific blower whenever a flare shuts down to ensure that no collected LFG is vented to the atmosphere untreated.

During the reporting period, the LFG extraction system was off-line on several occasions for a total of 25.20 hours. Shutdowns involved pre-programmed or manual system shutdowns prior to non-compliant operation or equipment failure, and involved inspection, maintenance and/or repair of the GCCS, and thus meet the criteria for allowed GCCS downtime, as specified in Rule 8-34-113 and in accordance with the BAAQMD November 5, 2018 Compliance Advisory, with the exception of 10 events. These events occurred on the following dates:

- August 17, 2021 (RCA IDs 08B36 and 08B37; RCA IDs 08B38 and 08B39 – high gas flow);
- August 23, 2021 (RCA IDs 08B44 and 08B45 – flame failure);
- August 24, 2021 (RCA IDs 08B46 and 08B47 – flame failure);
- August 30, 2021 (RCA IDs 08B51 and 08B52 – flame failure);

- September 4, 2021 (RCA IDs 08B58 and 08B59 - auto block valve failure/compressor low air pressure);
- September 17, 2021 (RCA IDs 08B82 and 08B83 - flame failure);
- September 21, 2021 (RCA IDs 08B96 and 08B97 - auto block valve failure/compressor malfunction);
- September 22, 2021 (RCA IDs 08C01 and 08C02 - auto block valve failure/compressor malfunction); and
- January 19, 2022 (RCA IDs 08E92 and 08E93 - blower malfunction).

Reportable Compliance Activity (RCA) forms and combined 10/30-Day Title V Reports and Notifications for the respective RCA IDs were submitted to the BAAQMD within the required time frames.

On October 21, 2021, the BAAQMD inspector, Jay Patel, issued Notice of Violation (NOV) A55726 for failure to operate the GCCS continuously during RCA events 08A51 and 08A52; 08B58 and 08B59; 08B96 and 08B97. For additional information, including corrective actions taken, please refer to the November 2, 2021 10-day Response Letter and the respective 30-day Breakdown Reports.

A summary of the GCCS downtime for this reporting period is provided in **Table 1a**, including the date, reason for the downtime, description of the corrective measure(s) implemented to resume GCCS operation, and the total elapsed time for each event. Gas extraction system downtime records are available for review at the site.

3.1.2 Emission Control System Downtime

During the reporting period, the A-2 and A-3 Flares were off-line on several occasions. Summaries of the A-2 and A-3 Flares downtime are provided in **Table 1b and 1c**, including the date, reason for the downtime, and the total elapsed time for each event. During the reporting period, downtime for the A-2 Flare occurred over a cumulative period of approximately 34.07 hours and for the A-3 Flare over a cumulative period of approximately 62.83 hours. Emission control system downtime records are available for review at the site.

3.1.3 Individual Well Downtime

In some instances, the entire GCCS may not go off-line, but individual extraction wells may be taken off-line for inspection, maintenance, and/or repair, and active filling in the vicinity of the well, as well as for other unforeseen circumstances. These are generally planned events, although such events can occur without notice. During the reporting period, several wells were temporarily taken offline or were taken offline during a previous reporting period and remained offline for a portion of the reporting period due to active filling and construction activities occurring in their vicinity.

On February 19, 2021 and May 25, 2021, IDCC submitted Requests for Limited Exemption from the requirements of BAAQMD Regulation 8-34 117.1 through 117.6 and 118 Construction Plan (118 Plan) for construction activities to the BAAQMD.

Wells NILEW741, NILEW726, NILEW066, NILEW451, NILEW464, NILEW465, NILEW496, NILEW497, NILEW626, NILEW664, NILEW665, NILEW674, NILEW707, NILEW711, NILEW733, NILEW744, and NILEW745 remained offline at the end of the reporting period and will be reported as a startup once the filling operations around each well cease and the wells are brought back online. These wells were taken off-line in accordance with the requirements of Rule 8-34.

On August 19, 2021, a Subsurface Oxidation (SSO) event was discovered. Following the discovery, site personnel immediately notified operations and maintenance (O&M) personnel and inspected the surrounding area for additional SSO indicators. Immediate actions to protect human and environmental health and safety were taken by O&M personnel, as isolation valves were closed and wells within a 250 and 500-foot radius were disconnected from vacuum to remediate the SSO. Procedures were followed per BAAQMD Regulation 8, Rule 34, Section 117 (8-34-117), except wells were taken offline greater than 24 hours without prior approval from the Air Pollution Control Officer (APCO). Details of the well SSMs can be found in **Table 2**.

Pursuant to Permit Condition No. 10423, Part 6, the owner/operator must notify the District of expected installation or decommissioning dates. A combined Well Decommissioning and Startup Notification Letter will be submitted to the BAAQMD for the well actions noted above.

Details of individual well shutdown and well startups occurring during the reporting period are provided in **Table 2**. Please see the SSM Report included in this submittal for additional details.

3.1.4 Flow Meter and Temperature Gauge Downtime

The continuous operation of the GCCS is measured through the continuous measurement of LFG flow to each flare and flare combustion temperature. As required by Rule 8-34, each flare at Newby is equipped with flow measuring devices and temperature gauges that provide continuous readout displays using digital chart recorders. During the reporting period, the flow meter(s) and temperature gauge(s)/recorders at the flare station did not go out of operation due to malfunction or other breakdown conditions. Continuous monitoring and calibration information are available for review at the site.

3.1.5 Flare Combustion Zone Temperature

Newby is required by permit condition No. 10423, Part 9 to operate the A-2 and A-3 Flares in such a manner that the combustion zone temperature of the flares does not drop below the permitted limit of 1,400 and 1,501 degrees Fahrenheit (°F), respectively, (averaged over a 3-hour period) or a higher or lower temperature based on the most recent source test.

During the reporting period, the minimum temperature at which the A-2 flare was required to operate was 1,452°F (1,502 °F minus 50 °F), based on the February 23, 2021 source test performed by Blue Sky Environmental, Inc. (final report issued on April 1, 2021). During the reporting period, the minimum temperature at which the A-3 flare was required to operate was 1,454°F (1,504 °F minus 82 °F), based on the February 23, 2021 source test performed by Blue Sky Environmental, Inc. (final report issued on April 1, 2021). Please note that under the updated NESHAP rules, the requirement is the source test temperature minus 82°F, but as BAAQMD Rule 8-34 and NSPS WWW are still in Newby's permit, we will continue to comply with the source test temperature minus 50°F temperature limit.

During the reporting period, the A-2 and A-3 Flares operated above the minimum established 3-hour average temperature limit at all times, except during periods of SSM.

Flare temperature records are available for review at the site.

3.2 COMPONENT LEAK QUARTERLY MONITORING

During the reporting period, quarterly testing of the GCCS components for any leaks with a methane concentration of greater than 1,000 parts per million by volume (ppmv), as required by BAAQMD Rule 8-34-503, was conducted. Testing in the wellfield and at the flare station was performed using a flame ionization detector (FID) which was calibrated on the same day as the testing. Monitoring results and calibration records are provided in **Appendix C** and are available for review at the site.

3.2.1 Third Quarter 2021 Monitoring

SCS Field Services (SCSFS) conducted the component leak testing of the wellfield and flare station on July 12, 2021. No component leaks above 1,000 ppmv were detected in the wellfield or at the flare station during the Third Quarter 2021 monitoring event.

3.2.2 Fourth Quarter 2021 Monitoring

SCSFS conducted the component leak testing of the flare station and wellfield on November 29, 2021. No component leaks above 1,000 ppmv were detected in the wellfield or at the flare station during the Fourth Quarter 2021 monitoring event.

3.3 CONTROL EFFICIENCY

LFG Flares A-2 and A-3 was also tested on February 23, 2021 to demonstrate compliance with the control efficiency standard of 98 percent NMOC destruction efficiency or outlet concentration of 30 ppmv of NMOC as methane (for flares) as required by BAAQMD Rules 8-34-301.3, 8-34-412, 8-34-501.4, and Condition # 10423, Part 11. The NMOC destruction efficiency for the A-2 Flare during the February 2021 source test was measured to be >99.56 percent by weight, and the NMOC as methane concentration in the flare outlet was <2.5 ppmv. The NMOC destruction efficiency for the A-3 Flare during the February 2021 source test was measured to be >99.57 percent by weight, and the NMOC as methane concentration in the flare outlet was <2.5 ppmv. As such, Flares A-2 and A-3 is in compliance with the aforementioned rules and permit condition by meeting the ppmv limit.

Excerpts from the February 2021 source test report dated April 1, 2021, summarizing the test results, were provided in the August 2021 report.

3.4 LANDFILL SURFACE EMISSIONS MONITORING

Surface emissions monitoring (SEM) was conducted at Newby on a quarterly basis during the reporting period, in accordance with BAAQMD Rule 8-34-303 and 8-34-506. The SEM events were conducted in accordance with the SEM plan in the landfill's GCCS Design Plan. Testing was performed using a Trimble SiteFID Landfill Gas Monitor Portable FID, which was calibrated the same day as the testing. The results of this monitoring are summarized below. Reports for each quarterly monitoring event are provided in **Appendix C**. Records of SEM are available for review at the site.

3.4.1 Third Quarter 2021 Monitoring

SCSFS field technicians monitored the landfill surface for leaks with a methane concentration of greater than 500 ppmv above background on July 12, 13, 14, 15, 19, 22, 23, and 30, 2021. Surface emissions in excess of 500 ppmv were detected at forty (40) locations during the third

quarter 2021 monitoring event. The locations with the exceedances and associated methane concentrations are provided in the Third Quarter 2021 SEM report (**Appendix C**).

SCSFS field technicians performed appropriate corrective actions, including flow increases to the surrounding extraction wells, cover repairs, and installation of borehole emission control systems. SCSFS completed the 10-day re-monitoring events for these locations on July 23 and 30, 2021. All the locations except for seventeen (17) locations were under the 500 ppmv threshold. As such, an expansion of the collection system is required within 120 days, by November 12, 2021. On November 10, 2021, horizontal collector NILHC245 was started up, to fulfill the 120-day requirement.

3.4.1 Fourth Quarter 2021 Monitoring

SCSFS monitored the landfill surface for leaks with a methane concentration of greater than 500 ppmv above background on November 8, 15, 17, and 19, 2021. Surface emissions in excess of 500 ppmv were detected at forty-three (43) locations during the fourth quarter 2021 monitoring event. The locations with the exceedances and associated methane concentrations are provided in the fourth quarter 2021 SEM report (**Appendix C**).

SCSFS field technicians performed appropriate corrective actions, including flow increases to the surrounding extraction wells and borehole repairs. SCSFS completed the 10-day re-monitoring event for these locations on November 18 and 24, 2021 and performed the 1-month re-monitoring event, as required by NSPS, on December 8 and 15, 2021, and no locations remained in compliance. Based on these monitoring results no additional follow up testing was required.

3.5 WELLHEAD MONTHLY MONITORING

Monthly wellhead monitoring for pressure, temperature, and oxygen content was conducted by SCSFS to comply with BAAQMD Rule 8-34-305 and 9-34-414. The results of this monitoring are summarized below. Wellhead exceedances are provided in **Table 3, 4, and 5**.

Please note that during the reporting period, all active wells were monitored.

3.5.1 Pressure

The majority of the operational extraction wells were under negative pressure during the monitoring events conducted during the reporting period, in accordance with BAAQMD Rule 8-34-305 and 8-34-414. For any wells that exhibited positive pressure during this reporting period, the identification number and dates that each well was operating with positive pressure are provided in **Table 3**. The table also includes corrective action and re-monitoring results. In all instances, corrective action and re-monitoring were performed in accordance with the 5- and 15-day requirements specified in the NSPS regulations and in Rule 8-34.

Wells NIHC17-2, NIHC17-3, NILEW066, NILEW451, NILEW464, NILEW465, NILEW496, NILEW497, NILEW626, NILEW664, NILEW665, NILEW707, NILEW711, NILEW726, NILEW733, NILEW742, NILEW744, NILEW745, NISS17-3, and NISS17-4 demonstrated a positive pressure reading at the end of the reporting period. These wells will be returned under negative pressure by the applicable compliance dates, as specified in BAAQMD Rule 8-34-414, and compliance will be documented in the next semi-annual report.

As of the end of the previous reporting period, wells NILEW628, NILEW699, NILHC246, NILHC247, NILHC248, NILHC249, and NILHC250 were operating under positive pressure. These wells were returned under negative pressure or decommissioned by the applicable compliance dates.

3.5.2 Oxygen

Newby has elected to use oxygen as its compliance standard under Rule 8-34-305, rather than nitrogen. Per Newby's PTO Condition No. 10423, Part 6(c), 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 in the LFG at the main header is greater than 35 percent by volume (dry basis). The oxygen Higher Operating Value (HOV) of 15% is approved for wells: 3ORR, EW-13, IOIR, HC- 201. The oxygen HOV of 20% is approved for wells: HC-231, HC- 232, HC- 235, HC-237, and HC- 241.

The majority of the wells were operating within the regulatory limit of five (5) percent oxygen or their respective oxygen HOVs during the monitoring events conducted during the reporting period. The dates when wells were operating with excessive oxygen, and the well identification number, corrective actions, and re-monitoring results for these wells are provided in **Table 4**.

As of the end of the reporting period, all of the operating wells were operating with an oxygen concentration below the 5 percent limit or their respective oxygen HOVs except for wells: NIHC227A, NILEW035, NILEW228, NILEW491, NILEW604, NILEW620, NILEW668, NILEW672, NILEW677, NILEW684, NILEW695, NILEW704, NILEW723, NILEW763, NILEW769, NILMW005, NILMW008, NILMW011, NILMW020, NILMW031, NILMW034, and NILW728A. The wells will be returned to below the 5 percent limit as specified in BAAQMD Rule 8-34-414, and compliance will be documented in the next semi-annual report.

As of the end of the previous reporting period, wells NI3EW40R, NILEW217, NILEW431, NILEW463, NILEW514, NILEW677, NILEW685, NILEW698, NILEW704, NILEW720, NILEW723, NILEW747, NILEW748, NILEW753, NILEW760, NILEW769, NILEW16, NILMW002, NILMW020, NILMW034, NILW573A, NILW574A, and NLCRST05 were operating with an oxygen concentration above the 5 percent limit. The wells were back in compliance or decommissioned within the timeline specified in 8-34-414.

3.5.3 Temperature

BAAQMD Rule 8-34-305 requires the landfill gas temperature in each wellhead to measure less than 55 degrees Celsius (°C) or 131°F. However, Condition No. 10423, Part 6(d) in Newby's BAAQMD PTO allows Newby to operate wells EW-39R, EW-40R, EW-14, EW-37, EW-005, EW-00A, EW-00D, EW-00E, EW-019, EW-025, EW-106, EW-218, EW-224, EW-243, EW-51R, EW-54R, NI3EW07R, NI3EW31, NILEW106, NILEW464, NILEW466, NILEW479, NILEW481, NILEW482, NILEW488, NILEW489, NILEW497, NILEW511, NILEW568, NILEW570, NILEW599, NILEW601, NILEW604, NILEW617, NILEW621, NILEW622, NILEW623, NILEW626, NILEW628, NILEW663, NILEW664, NILEW665, NILEW666, and NILEW667 at an alternative temperature of 145°F and well EW-07R at an alternative temperature of 150°F.

The majority of wells were operating within their respective limits of 131°F, 145°F, and 150°F during the monitoring events conducted during the reporting period. The dates when wells were operating above their respective temperature limits, and the well identification number, correction actions, and re-monitoring results for these wells are provided in **Table 5**.

As of the end of the previous reporting period, wells NILEW690, NILEW701, and NILEW752 were operating with a temperature higher than 131 °F. These wells returned to compliance within the timelines specified in 8-34-414.

As of the end of this reporting period, wells NILEW690 and NILEW752 were operating with a temperature higher than 131 °F. The wells will be returned to below the 131°F limit as specified in BAAQMD Rule 8-34-414, and compliance will be documented in the next semi-annual report.

An HOV application to request an increase of the allowable wellhead temperature limit from 131 °F to 145 °F for wells NILEW690, NILEW691, NILEW701, and NILEW703 was submitted to the USEPA and BAAQMD on February 6, 2020. Addendums requesting an increase of the allowable wellhead temperature limit from 131 °F to 145 °F for wells NILEW476, NILEW642, NILEW703, NILEW707, and NILEW752 were submitted in April 2020 and August 2021. The BAAQMD has provided approval of these HOV limits pending approval from the USEPA.

IDCC has followed up with the USEPA regarding the application in August 2020, September 2020, October 2020, April 2021, and August 2021 but no response has been received. IDCC is currently awaiting a response to the HOV requests.

3.5.4 Corrective Action Analysis

RCA were conducted for wells with temperature and pressure exceedances past 15 days after Subpart XXX became effective. Corrective action analysis (CAA) were performed for wells not corrected within 60 days. The RCA and CAA forms are included in **Appendix D**. 75-day notifications were submitted for any wells that could not be corrected within 60 days.

3.5.5 Enhanced Monitoring

Per §63.1961(a)(5), enhanced monitoring is required at each well with a measurement of landfill gas temperature greater than 145 °F. From September 27, 2021 through January 31, 2022, enhanced monitoring was not required at any wells pursuant to Subpart AAAA.

There were no wells greater than 170 °F during the reporting period.

3.6 COVER INTEGRITY MONITORING

Under BAAQMD Rule 8-34-510 and the NSPS, the landfill surface must be monitored at least monthly for evidence of cracks or other surface integrity issues, which could allow for surface emissions. During the reporting period, cover integrity monitoring was conducted by SCSFS personnel in conjunction with the wellhead monitoring on August 27, September 24, October 29, November 29, December 29, 2021, and January 28, 2022 using procedures specified in the GCCS Design Plan. The observations during these monitoring events indicated the landfill surface was in good condition. In the event visual evidence suggested otherwise, the surface will be promptly repaired. Records of cover integrity monitoring are available for review upon request.

3.7 LIQUIDS MONITORING

Newby has not injected liquid in the last 10 years, nor injected liquids during the reporting period. Therefore CCL reports zero (0) volumes of liquids injected and zero (0) acres of area for liquids injection. It is not subject to the liquids reporting requirements of Subpart XXX.

3.8 REPORTING REQUIREMENTS THAT WERE PREVIOUSLY SUBMITTED

Amendments to the MSW Landfill NESHAP (40 CFR 63, Subpart AAAAA) were published in the Federal Register on March 26, 2020. As noted in 40 CFR 63.1930(a) and (b), landfills must meet the requirements of the amended subpart beginning no later than September 27, 2021. 40 CFR 63.1981 notes that reports submitted previously under NSPS or EG (40 CFR 60 Subparts WWW or XXX; or a state or federal plan implementing 40 CFR 60 Subparts Cc or Cf) do not have to be resubmitted, but a statement certifying submission of these reports must be included in the first semi-annual report required under the amended NESHAP. The facility is therefore taking the opportunity to notify and certify that the following reports were submitted previously:

- Initial Design Capacity Report;
- Initial NMOC Emission Rate Report;
- Initial/Revised Gas Collection and Control System (GCCS) Design Plan (Full Design Plan with Alternatives submitted on March 6, 2018); and
- Initial Performance Test Report.

Note that all other reports noted above with the exception of the Revised GCCS Design Plan were submitted outside of the 5-year retention window. A certification statement is included in Page 1 of this report. This ensures the reports are recognized as previously submitted under 40 CFR 60 Subparts WWW or XXX; or a state or federal plan implementing 40 CFR 60 Subparts Cc or Cf.

3.9 GAS GENERATION ESTIMATE AND MONTHLY LANDFILL GAS FLOW RATES

The Newby 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.

3.10 ANNUAL WASTE ACCEPTANCE RATE AND REFUSE IN PLACE

Newby is an active landfill that continues to accept refuse for disposal. From August 1, 2021 through January 31, 2022, the site accepted 711,749.802 tons of decomposable waste and cover material, resulting in a cumulative waste-in-place total of 37,271,225.48 tons as of January 31, 2022.

3.10.1 Non-Degradable Waste Areas

No areas of non-degradable waste deposition are known to exist. There are no landfill areas that are excluded from the collection system requirements.

SECTION II. SSM PLAN REPORT

As mentioned previously, Newby is subject to 40 CFR Part 63, Subpart AAAAA, the NESHAPS for MSW Landfills. Newby maintains a SSM Plan which documents the procedures for operating and maintaining the affected elements of the GCCS during startup, shutdown, and malfunction (SSM). The SSM events that occurred during the reporting period of August 1, 2021 through January 31, 2022 are documented in this section. SSM requirements per the updated NESHAP ended on September 27, 2021. However, because SSM reporting requirements are still in the Title V permit, we will continue to report until the conditions are removed.

During the reporting period, there were forty-four (44) SSM events involving shutdown of the entire GCCS. Thirty-four (34) of these events were planned startups/shutdowns and ten (10) of these startup/shutdown events were associated with a malfunction of the GCCS.

During the reporting period, there were one hundred and eight (108) SSM events involving the wellfield. Additional wells were offline from previous reporting periods and remained offline for all or a portion of the reporting period. These events involved planned shutdowns of several wells on various dates due to active landfilling in the vicinity of these wells. All wells except for NILEW741, NILEW726, NILEW066, NILEW451, NILEW464, NILEW465, NILEW496, NILEW497, NILEW626, NILEW664, NILEW665, NILEW674, NILEW707, NILEW711, NILEW733, NILEW744, and NILEW745 remained offline as of the end of the reporting period and will be reported as startups once the landfilling activities in the vicinity of these wells cease and the wells are brought back online. There were no malfunctions of any of the wellfield components during the reporting period.

During the reporting period, there were no planned startups/shutdowns or known malfunctions of LFG monitoring equipment (e.g. flow measuring/recording device, temperature measuring/recording device).

In each case described above, the SSM Plan was successfully implemented. Specific information regarding these SSMs are included in **Tables 1a (entire GCCS), 1b (flares), and 2 (wells)**.

No revisions were made to the SSM Plan during this reporting period. A copy of the SSM Plan and all revisions/addenda are kept on file at the facility for at least five (5) years and are available to appropriate regulatory agency personnel for inspection.

SECTION III. TITLE V SEMI-ANNUAL REPORT

As specified in 40 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 August 1 through January 31 and February 1 through July 31, must be clearly identified in each report. This Title V Report covers the August 1, 2021 through January 31, 2022 reporting period.

This report has been prepared based on Table 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 E**.

SECTION IV. 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 February 1, 2021 to January 31, 2022.

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 F**.

Tables

**Table 1a. GCCS Downtime
Newby Island Landfill, Milpitas, California
(August 1, 2021 through January 31, 2022)**

Shutdown	Startup	Downtime Hours	Reason for Downtime	BAAQMD Exemption	Corrective Actions Taken
8/2/2021 12:44	8/2/2021 15:08	2.40	System Maintenance Shutdown; John Zinc Flow Meters Swap	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
8/2/2021 15:52	8/2/2021 16:06	0.23	System Maintenance Shutdown; John Zinc Flow Troubleshooting	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
8/4/2021 14:54	8/4/2021 15:00	0.10	FL-100 High Gas Flow Alarm (Construction Related) FI-150 shutdown after due to flame failure.	8-34-118, Construction Activities	O&M personnel completed inspection then restarted the flares.
8/4/2021 15:46	8/4/2021 16:16	0.50	Flame Failure due to Tech start-up/maintenance.	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
8/4/2021 17:34	8/4/2021 17:40	0.10	FL-100 High Gas Flow Alarm (Construction Related) FI-150 shutdown after due to flame failure.	8-34-118, Construction Activities	O&M personnel completed inspection then restarted the flares.
8/10/2021 12:02	8/10/2021 12:08	0.10	FL-100 High Gas Flow Alarm (Peek flow in stack) FI-150 shutdown after due to flame failure.	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
8/10/2021 12:50	8/10/2021 12:56	0.10	FL-100 High Gas Flow Alarm (Peek flow in stack) FI-150 shutdown after due to flame failure.	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
8/17/2021 11:56	8/17/2021 12:04	0.13	FL-100 High Gas Flow Alarm (Peek flow in stack) FI-150 shutdown after due to flame failure. Unalarmed flame fail condition/pre programmed preventative shutdown	RCA Submitted for this event (IDs 08B36 and 08B37)	O&M personnel completed inspection and maintenance then restarted the flares. At the time of the breakdown event, the A-2 and A-3 Flares were equipped with loaner flow meters, which recorded higher flow. On August 27, 2021, the loaner flow meters were removed and the original flow meters were re-installed by John Zink personnel.
8/17/2021 13:36	8/17/2021 13:44	0.13	FL-100 High Gas Flow Alarm (Peek flow in stack) FI-150 shutdown after due to flame failure. Unalarmed flame fail condition/pre programmed preventative shutdown	RCA Submitted for this event (IDs 08B38 and 08B39)	O&M personnel completed inspection and maintenance then restarted the flares. At the time of the breakdown event, the A-2 and A-3 Flares were equipped with loaner flow meters, which recorded higher flow. On August 27, 2021, the loaner flow meters were removed and the original flow meters were re-installed by John Zink personnel.
8/23/2021 14:22	8/23/2021 14:30	0.13	FL-100 High Gas Flow Alarm (Peek flow in stack) FI-150 shutdown after due to flame failure.	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
8/23/2021 19:28	8/23/2021 19:36	0.13	FL-100 High Gas Flow Alarm (Peek flow in stack) FI-150 shutdown after due to flame failure. Unalarmed flame fail condition/pre programmed preventative shutdown	RCA Submitted for this event (IDs 08B44 and 08B45)	O&M personnel completed inspection and maintenance then restarted the flares. At the time of the breakdown event, the A-2 and A-3 Flares were equipped with loaner flow meters, which recorded higher flow. On August 27, 2021, the loaner flow meters were removed and the original flow meters were re-installed by John Zink personnel.
8/24/2021 20:02	8/24/2021 20:10	0.13	FL-100 High Gas Flow Alarm (Peek flow in stack) FI-150 shutdown after due to flame failure. Unalarmed flame fail condition/pre programmed preventative shutdown	RCA Submitted for this event (IDs 08B46 and 08B47)	O&M personnel completed inspection and maintenance then restarted the flares. At the time of the breakdown event, the A-2 and A-3 Flares were equipped with loaner flow meters, which recorded higher flow. On August 27, 2021, the loaner flow meters were removed and the original flow meters were re-installed by John Zink personnel.
8/27/2021 8:24	8/27/2021 9:20	0.93	System Maintenance Shutdown John Zinc Flow Meters Swap	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.

**Table 1a. GCCS Downtime
Newby Island Landfill, Milpitas, California
(August 1, 2021 through January 31, 2022)**

Shutdown	Startup	Downtime Hours	Reason for Downtime	BAAQMD Exemption	Corrective Actions Taken
8/27/2021 10:04	8/27/2021 10:10	0.10	System Maintenance Shutdown John Zinc Flow Troubleshooting	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
8/27/2021 11:46	8/27/2021 12:02	0.27	System Maintenance Shutdown John Zinc Flow Troubleshooting	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
8/30/2021 21:26	8/30/2021 21:32	0.10	FI-100 Low Gas Flow. FI-150 Shutdown for Flame Failure	RCA Submitted for this event (IDs 08B51 and 08B52)	O&M personnel completed inspection then restarted the flares.
9/1/2021 9:30	9/1/2021 9:36	0.10	Low Gas Flow due to construction activities	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
9/1/2021 11:54	9/1/2021 13:00	1.10	Low Gas Flow due to construction activities	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
9/4/2021 16:58	9/4/2021 18:24	1.43	air compressor malfunction (RCA submitted)	RCA Submitted for this event (IDs 08B58 and 08B59)	O&M personnel completed inspection then restarted the flares.
9/11/2021 17:26	9/11/2021 20:26	3.00	Flare Maintenance and Troubleshooting	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
9/14/2021 13:18	9/14/2021 14:06	0.80	Low Gas Flow due to construction activities	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
9/17/2021 20:24	9/17/2021 20:32	0.13	unalarmred flame fail condition leading to a pre programmed preventative shutdown. (RCA Submitted).	RCA Submitted for this event (IDs 08B82 and 08B83)	O&M personnel completed inspection then restarted the flares.
9/21/2021 22:14	9/22/2021 6:20	8.10	air compressor malfunction (RCA submitted)	RCA Submitted for this event (IDs 08B96 and 08B97)	O&M personnel completed inspection then restarted the flares. Personnel from Cisco Air Systems (Cisco), the air compressors manufacture, was on site on September 22, 2021 to conduct an inspection and maintenance on the air compressor. Per Cisco, the inlet valve actuator was stuck closed, and the solenoid was not supplying full air pressure to the actuator, when the controller was showing it was running on load. IDCC has replaced the inlet valve actuator and blowdown valve body per the manufacturer's recommendations.
9/22/2021 6:36	9/22/2021 6:42	0.10	Air Compressor Maintenance and Troubleshooting	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
9/22/2021 17:14	9/22/2021 17:26	0.20	Air Compressor Maintenance and Troubleshooting	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
9/22/2021 17:40	9/22/2021 17:50	0.17	Air Compressor Maintenance and Troubleshooting	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.

**Table 1a. GCCS Downtime
Newby Island Landfill, Milpitas, California
(August 1, 2021 through January 31, 2022)**

Shutdown	Startup	Downtime Hours	Reason for Downtime	BAAQMD Exemption	Corrective Actions Taken
9/22/2021 21:22	9/22/2021 21:30	0.13	air compressor malfunction (RCA submitted)	RCA Submitted for this event (IDs 08C01 and 08C02)	O&M personnel completed inspection then restarted the flares. Personnel from Cisco Air Systems (Cisco), the air compressors manufacture, was on site on September 22, 2021 to conduct an inspection and maintenance on the air compressor. Per Cisco, the inlet valve actuator was stuck closed, and the solenoid was not supplying full air pressure to the actuator, when the controller was showing it was running on load. IDCC has replaced the inlet valve actuator and blowdown valve body per the manufacturer's recommendations.
9/23/2021 10:20	9/23/2021 10:26	0.10	Flare Maintenance and Troubleshooting	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
9/23/2021 10:34	9/23/2021 10:36	0.03	Flare Maintenance and Troubleshooting	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
9/23/2021 10:56	9/23/2021 10:58	0.03	Flare Maintenance and Troubleshooting	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
9/23/2021 11:40	9/23/2021 11:48	0.13	Flare Maintenance and Troubleshooting	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
9/23/2021 12:18	9/23/2021 12:24	0.10	Flare Maintenance and Troubleshooting	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
9/23/2021 12:32	9/23/2021 12:38	0.10	Flare Maintenance and Troubleshooting	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
9/23/2021 12:48	9/23/2021 12:54	0.10	Flare Maintenance and Troubleshooting	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
9/23/2021 13:04	9/23/2021 13:10	0.10	Flare Maintenance and Troubleshooting	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
9/23/2021 18:16	9/23/2021 18:26	0.17	Flare Maintenance and Troubleshooting	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
10/11/2021 12:42	10/11/2021 12:44	0.03	Maintenance and troubleshooting	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
10/14/2021 7:20	10/14/2021 7:58	0.63	Maintenance and troubleshooting	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
10/14/2021 16:08	10/14/2021 16:12	0.07	Maintenance and troubleshooting	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
11/16/2021 11:00	11/16/2021 11:54	0.90	Gas blower troubleshooting. (Check valve to Blower 104)	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
12/16/2021 10:06	12/16/2021 10:26	0.33	Air Combustion blower filter cleaning	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
12/16/2021 13:50	12/16/2021 14:58	1.13	Maintenance and troubleshooting	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.

**Table 1a. GCCS Downtime
Newby Island Landfill, Milpitas, California
(August 1, 2021 through January 31, 2022)**

Shutdown	Startup	Downtime Hours	Reason for Downtime	BAAQMD Exemption	Corrective Actions Taken
1/19/2022 17:58	1/19/2022 18:10	0.20	Blower Malfunction (RCA Submitted)	RCA Submitted for this event (IDs 08E92 08E93)	O&M personnel completed inspection then restarted the flares. The suspected malfunctioned blower, Blower 104, was inspected by the manufacturer, Dahl Beck, and a bearing replacement for the blower has been scheduled. As previously stated, the event occurred during a troubleshooting event on the blowers. As such, IDCC is requesting this event to be classified under BAAQMD Regulation 8, Rule 34, Section 113 (8-34-118), Inspection and Maintenance.
1/20/2022 16:26	1/20/2022 16:36	0.17	flares offline for blower swap/maintenance	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
Total:		25.20			

Notes:
Events in bold type denotes Malfunction Events
Downtimes listed represent periods when all landfill gas combustion devices were offline concurrently (no gas flow from the collection system).
All events listed involved GCCS inspection and/or maintenance activities prior to start up (or as soon as feasible following programmed startups) in accordance with Rule 8-34-113 requirements and the BAAQMD Compliance Advisory for Municipal Solid Waste Landfills, dated November 5, 2018, with the exception of the events that occurred on August 17, 23, 24,30, September 4, 17, 21, 22, 2021 and January 19, 2022 , which involved flame failure, air compressor malfunctions, and blower malfunctions. These events were considered reportable compliance activities (RCA) and breakdown relief was requested.

**Table 1b. Flare (A-2) Downtime
Newby Island Landfill, Milpitas, California
(August 1, 2021 through January 31, 2022)**

Shutdown	Startup	Downtime Hours	Reason for Downtime and BAAQMD Exemption
8/2/2021 12:44	8/2/2021 15:08	2.40	Rental Flow Meter Installation (113)
8/2/2021 15:52	8/2/2021 16:06	0.23	Rental Flow Meter Installation (113)
8/4/2021 14:54	8/4/2021 15:00	0.10	Flame Failure due to construction activities (113)
8/4/2021 15:46	8/4/2021 16:16	0.50	Flame Failure due to construction activities (113)
8/4/2021 17:34	8/4/2021 17:40	0.10	Flame Failure due to construction activities (113)
8/10/2021 12:02	8/10/2021 12:08	0.10	Flame Failure due to construction activities (113)
8/10/2021 12:50	8/10/2021 12:56	0.10	Flame Failure due to construction activities (113)
8/17/2021 11:56	8/17/2021 12:04	0.13	Flame Failure (RCA submitted, IDs 08B36 and 08B37)
8/17/2021 13:36	8/17/2021 13:44	0.13	Flame Failure (RCA submitted, IDs 08B38 and 08B39)
8/23/2021 14:22	8/23/2021 14:30	0.13	Flame Failure (113)
8/23/2021 19:28	8/23/2021 19:36	0.13	Flame Failure (RCA submitted, IDs 08B44 and 08B45)
8/24/2021 20:02	8/24/2021 20:10	0.13	Flame Failure (RCA submitted, IDs 08B46 and 08B47)
8/27/2021 8:22	8/27/2021 9:20	0.97	Calibrated Flow Meter Installation (113)
8/27/2021 10:04	8/27/2021 10:54	0.83	Calibrated Flow Meter Installation (113)
8/27/2021 11:46	8/27/2021 12:10	0.40	Calibrated Flow Meter Installation (113)
8/30/2021 21:26	8/30/2021 21:32	0.10	Flame Failure (RCA submitted, IDs 08B51 and 08B52)
9/1/2021 9:30	9/1/2021 9:36	0.10	Low Gas Flow due to construction activities (113)
9/1/2021 11:54	9/1/2021 13:00	1.10	Low Gas Flow due to construction activities (113)
9/4/2021 16:58	9/4/2021 18:24	1.43	air compressor malfunction (RCA submitted, IDs 08B58 and 08B59)
9/11/2021 17:26	9/11/2021 20:26	3.00	Air filter cleaning (113)
9/14/2021 13:18	9/14/2021 14:08	0.83	Low Gas Flow due to construction activities (113)
9/17/2021 20:24	9/17/2021 20:32	0.13	unalarmd flame fail condition leading to a pre programmed preventative shutdown. (RCA Submitted, IDs 08B82 and 08B83)
9/21/2021 22:14	9/22/2021 6:20	8.10	air compressor malfunction (RCA submitted, IDs 08B96 and 08B97)
9/22/2021 6:36	9/22/2021 6:42	0.10	Air Compressor Maintenance and Troubleshooting (113)
9/22/2021 17:14	9/22/2021 18:32	1.30	Air Compressor Maintenance and Troubleshooting (113)
9/22/2021 21:22	9/22/2021 21:30	0.13	air compressor malfunction (RCA submitted, IDs 08C01 and 08C02)
9/23/2021 10:20	9/23/2021 10:26	0.10	Flare Maintenance and Troubleshooting (113)
9/23/2021 10:34	9/23/2021 10:40	0.10	Flare Maintenance and Troubleshooting (113)
9/23/2021 10:56	9/23/2021 11:02	0.10	Flare Maintenance and Troubleshooting (113)
9/23/2021 11:40	9/23/2021 11:48	0.13	Flare Maintenance and Troubleshooting (113)
9/23/2021 12:18	9/23/2021 12:26	0.13	Flare Maintenance and Troubleshooting (113)
9/23/2021 12:32	9/23/2021 12:38	0.10	Flare Maintenance and Troubleshooting (113)
9/23/2021 12:48	9/23/2021 12:56	0.13	Flare Maintenance and Troubleshooting (113)
9/23/2021 13:04	9/23/2021 13:10	0.10	Flare Maintenance and Troubleshooting (113)

**Table 1b. Flare (A-2) Downtime
Newby Island Landfill, Milpitas, California
(August 1, 2021 through January 31, 2022)**

Shutdown	Startup	Downtime Hours	Reason for Downtime and BAAQMD Exemption
9/23/2021 18:16	9/23/2021 18:26	0.17	Flare Maintenance and Troubleshooting (113)
10/7/2021 12:14	10/7/2021 12:28	0.23	Maintenance and troubleshooting (113)
10/11/2021 11:08	10/11/2021 11:40	0.53	Maintenance and troubleshooting (113)
10/11/2021 12:42	10/11/2021 12:50	0.13	Maintenance and troubleshooting (113)
10/14/2021 7:18	10/14/2021 7:58	0.67	Maintenance and troubleshooting (113)
10/14/2021 14:36	10/14/2021 15:00	0.40	Maintenance and troubleshooting (113)
10/14/2021 16:08	10/14/2021 16:16	0.13	Maintenance and troubleshooting (113)
10/20/2021 10:42	10/20/2021 12:34	1.87	Maintenance and troubleshooting (113)
11/16/2021 11:00	11/16/2021 11:58	0.97	Gas blower troubleshooting. (Check valve to Blower 104) (113)
12/16/2021 10:06	12/16/2021 10:28	0.37	Maintenance and troubleshooting (113)
12/16/2021 13:50	12/16/2021 17:34	3.73	Maintenance (Thermocouple replacement) and troubleshooting (113)
1/10/2022 11:56	1/10/2022 12:28	0.53	Low Gas Flow (113)
1/19/2022 17:58	1/19/2022 18:14	0.27	Blower Malfunction (RCA Submitted, IDs 08E92 and 08E93)
1/20/2022 12:50	1/20/2022 13:06	0.27	Offline for blower swap/maintenance (113)
1/20/2022 16:26	1/20/2022 16:36	0.17	Offline for blower swap/maintenance (113)
Total		34.07	

Notes:

Events in bold type denotes Malfunction Events

All events listed involved GCCS inspection and/or maintenance activities prior to start up (or as soon as feasible following programmed startups) in accordance with Rule 8-34-113 requirements and the BAAQMD Compliance Advisory for Municipal Solid Waste Landfills, dated November 5, 2018, with the exception of the events that occurred on August 17, 23, 24, 30, September 4, 17, 21, 22, 2021 and January 19, 2022 , which involved flame failure, air compressor malfunctions, and blower malfunctions. These events were considered reportable compliance activities (RCA) and breakdown relief was requested.

**Table 1c. Flare (A-3) Downtime
Newby Island Landfill, Milpitas, California
(August 1, 2021 through January 31, 2022)**

Shutdown	Startup	Downtime Hours	Reason for Downtime and BAAQMD Exemption
8/2/2021 12:44	8/2/2021 15:14	2.50	Rental Flow Meter Installation (113)
8/2/2021 15:16	8/2/2021 16:26	1.17	Rental Flow Meter Installation (113)
8/2/2021 16:34	8/2/2021 16:40	0.10	Rental Flow Meter Installation (113)
8/4/2021 14:54	8/4/2021 15:24	0.50	FL-100 High Gas Flow Alarm (113)
8/4/2021 15:32	8/4/2021 15:38	0.10	FL-100 High Gas Flow Alarm (113)
8/4/2021 15:46	8/4/2021 16:20	0.57	FL-100 High Gas Flow Alarm (113)
8/4/2021 17:34	8/4/2021 18:46	1.20	FL-100 High Gas Flow Alarm (113)
8/10/2021 12:02	8/10/2021 12:28	0.43	Low Air Flow Alarm (113)
8/10/2021 12:50	8/10/2021 13:52	1.03	Air Combustion Blower Filter Cleaning (113)
8/17/2021 11:56	8/17/2021 12:28	0.53	High Gas Flow (RCA submitted, IDs 08B36 and 08B37)
8/17/2021 13:36	8/17/2021 13:48	0.20	High Gas Flow (RCA submitted, IDs 08B38 and 08B39)
8/17/2021 13:54	8/17/2021 13:58	0.07	FL-100 High Gas Flow Alarm (113)
8/17/2021 14:10	8/17/2021 14:30	0.33	FL-100 High Gas Flow Alarm (113)
8/18/2021 11:24	8/18/2021 11:42	0.30	Low Gas Flow due to construction activities (113)
8/23/2021 14:22	8/23/2021 15:54	1.53	FL-100 High Gas Flow Alarm (113)
8/23/2021 19:28	8/23/2021 20:38	1.17	High Gas Flow (RCA submitted, IDs 08B44 and 08B45)
8/24/2021 20:02	8/24/2021 20:14	0.20	High Gas Flow (RCA submitted, IDs 08B46 and 08B47)
8/26/2021 14:20	8/26/2021 15:26	1.10	Low Gas Flow due to construction activities (113)
8/27/2021 8:24	8/27/2021 9:24	1.00	Calibrated Flow Meter Installation (113)
8/27/2021 9:38	8/27/2021 9:46	0.13	Calibrated Flow Meter Installation (113)
8/27/2021 10:04	8/27/2021 10:10	0.10	Calibrated Flow Meter Installation (113)
8/27/2021 11:46	8/27/2021 12:02	0.27	Calibrated Flow Meter Installation (113)
8/27/2021 12:22	8/27/2021 12:28	0.10	Calibrated Flow Meter Installation (113)
8/30/2021 21:26	8/30/2021 21:36	0.17	Air Blower Low Flow Shutdown (RCA submitted, IDs 08B51 and 08B52)
9/1/2021 9:30	9/1/2021 10:18	0.80	Low Gas Flow due to construction activities (113)
9/1/2021 11:52	9/1/2021 13:04	1.20	Air Compressor Maintenance and Troubleshooting (113)
9/4/2021 16:58	9/4/2021 18:28	1.50	air compressor malfunction (RCA submitted, IDs 08B58 and 08B59)
9/11/2021 17:26	9/11/2021 20:26	3.00	air filter cleaning (113)
9/14/2021 13:18	9/14/2021 14:06	0.80	Low Gas Flow due to construction activities (113)
9/17/2021 20:24	9/17/2021 20:36	0.20	unalarmd flame fail condition leading to a pre programmed preventative shutdown. (RCA Submitted, IDs 08B82 and 08B83)
9/21/2021 22:14	9/22/2021 6:24	8.17	air compressor malfunction (RCA submitted, IDs 08B96 and 08B97)
9/22/2021 6:34	9/22/2021 8:58	2.40	Air Compressor Maintenance and Troubleshooting (113)
9/22/2021 17:14	9/22/2021 17:26	0.20	Air Compressor Maintenance and Troubleshooting (113)
9/22/2021 17:40	9/22/2021 17:50	0.17	Air Compressor Maintenance and Troubleshooting (113)
9/22/2021 21:22	9/22/2021 21:34	0.20	air compressor malfunction (RCA submitted, IDs 08C01 and 08C02)
9/23/2021 10:20	9/23/2021 10:26	0.10	Flare Maintenance and Troubleshooting (113)
9/23/2021 10:34	9/23/2021 10:36	0.03	Flare Maintenance and Troubleshooting (113)
9/23/2021 10:56	9/23/2021 10:58	0.03	Flare Maintenance and Troubleshooting (113)

**Table 1c. Flare (A-3) Downtime
Newby Island Landfill, Milpitas, California
(August 1, 2021 through January 31, 2022)**

Shutdown	Startup	Downtime Hours	Reason for Downtime and BAAQMD Exemption
9/23/2021 11:40	9/23/2021 12:04	0.40	Flare Maintenance and Troubleshooting (113)
9/23/2021 12:18	9/23/2021 12:24	0.10	Flare Maintenance and Troubleshooting (113)
9/23/2021 12:30	9/23/2021 12:36	0.10	Flare Maintenance and Troubleshooting (113)
9/23/2021 12:48	9/23/2021 12:54	0.10	Flare Maintenance and Troubleshooting (113)
9/23/2021 13:02	9/23/2021 13:10	0.13	Flare Maintenance and Troubleshooting (113)
9/23/2021 13:22	9/23/2021 14:18	0.93	Flare Maintenance and Troubleshooting (113)
9/23/2021 14:34	9/23/2021 14:48	0.23	Flare Maintenance and Troubleshooting (113)
9/23/2021 18:14	9/23/2021 18:28	0.23	Flare Maintenance and Troubleshooting (113)
10/1/2021 10:40	10/1/2021 11:42	1.03	Air Combustion Blower Filter Cleaning (113)
10/4/2021 21:30	10/4/2021 21:40	0.17	Maintenance and troubleshooting (113)
10/7/2021 19:36	10/7/2021 19:46	0.17	Maintenance and troubleshooting (113)
10/9/2021 19:50	10/9/2021 20:00	0.17	Maintenance and troubleshooting (113)
10/11/2021 11:42	10/11/2021 12:44	1.03	Air Combustion Blower Filter Cleaning (113)
10/12/2021 18:08	10/12/2021 18:18	0.17	Maintenance and troubleshooting (113)
10/13/2021 18:42	10/13/2021 18:52	0.17	Maintenance and troubleshooting (113)
10/13/2021 23:02	10/13/2021 23:14	0.20	Maintenance and troubleshooting (113)
10/14/2021 7:20	10/14/2021 15:02	7.70	Burner Tip Cleaning Event (113)
10/14/2021 15:56	10/14/2021 16:12	0.27	Maintenance and troubleshooting (113)
11/2/2021 14:44	11/2/2021 15:26	0.70	Scheduled Air Blower Filter Cleaning (113)
11/4/2021 10:36	11/4/2021 12:46	2.17	Scheduled Air Compressor Service (113)
11/16/2021 10:58	11/16/2021 11:54	0.93	Gas blower troubleshooting. (Check valve to Blower 104) (113)
11/23/2021 11:22	11/23/2021 12:12	0.83	Scheduled Air Blower Filter Cleaning (113)
12/16/2021 10:04	12/16/2021 10:26	0.37	Maintenance and troubleshooting (113)
12/16/2021 13:50	12/16/2021 14:58	1.13	Air Combustion blower filter cleaning (113)
12/16/2021 15:10	12/16/2021 15:18	0.13	Maintenance and troubleshooting (113)
12/16/2021 22:10	12/16/2021 22:20	0.17	Maintenance and troubleshooting (113)
12/19/2021 6:50	12/19/2021 7:00	0.17	Maintenance and troubleshooting (113)
1/10/2022 8:42	1/10/2022 9:28	0.77	Low Gas Flow (113)
1/17/2022 10:44	1/17/2022 10:54	0.17	Low Gas Flow (113)
1/19/2022 17:58	1/19/2022 18:10	0.20	Blower Malfunction (RCA Submitted, IDs 08E92 and 08E93)
1/20/2022 12:50	1/20/2022 13:02	0.20	Offline for blower swap/maintenance (113)
1/20/2022 16:26	1/20/2022 16:38	0.20	Offline for blower swap/maintenance (113)
1/26/2022 8:16	1/26/2022 16:04	7.80	Scheduled Burner Tip Cleaning Event (113)
Total		62.83	

Notes:

Events in bold type denotes Malfunction Events

All events listed involved GCCS inspection and/or maintenance activities prior to start up (or as soon as feasible following programmed startups) in accordance with Rule 8-34-113 requirements and the BAAQMD Compliance Advisory for Municipal Solid Waste Landfills, dated November 5, 2018, with the exception of the events that occurred on August 17, 23, 24, 30, September 4, 17, 21, 22, 2021 and January 19, 2022, which involved flame failure, air compressor malfunctions, and blower malfunctions. These events were considered reportable compliance activities (RCA) and breakdown relief was requested.

**Table 2. Individual Well Startups, Shutdowns and Decommissions
Newby Island Landfill, Milpitas, California
(August 1, 2021 through January 31, 2022)**

Well ID	Shutdown	Start-up	Days Offline	Reason for Shutdown/Startup
NIHC17-2	7/14/21 15:33	8/27/21 11:05	43.81	Well Temporarily Offline Due to Filling
NIHC17-3	7/14/21 15:34	8/9/2021 14:34	25.96	Well Temporarily Offline Due to Filling
NILEW741*	7/14/21 16:10		201.33	Well Temporarily Offline Due to Filling (actively offline)
NILMW015	7/27/21 11:11	8/30/2021 11:34	34.02	Well Temporarily Offline Construction 118-Plan
NILHC244	N/A	8/2/2021 13:43	N/A	Horizontal Collector Start Up
NILEW510	8/12/21 12:45	9/15/2021 14:28	34.07	Well Temporarily Offline Due to Filling
NILEW692	8/10/21 10:39	8/30/2021 12:08	20.06	Well Temporarily Offline Construction 118-Plan
NILEW693	8/10/21 10:41	8/30/2021 11:59	20.05	Well Temporarily Offline Construction 118-Plan
NILEW756	8/13/21 14:14	1/7/2022 15:10	147.04	Well Temporarily Offline Due to Filling
NILCW001	8/19/2021 16:52	8/20/2021 10:40	0.74	Well Temporarily Offline to Remediate Subsurface Oxidation (SSO) Event
NILCW001	8/20/2021 10:43	8/20/2021 10:43	0.00	Well Temporarily Offline to Remediate SSO Event
NILEW757	8/26/2021 16:17	8/28/2021 10:51	1.77	Well Temporarily Offline to Remediate SSO Event
NILCW002	8/26/2021 16:28	8/28/2021 11:03	1.77	Well Temporarily Offline to Remediate SSO Event
NILCW001	8/26/2021 16:33	8/28/2021 10:58	1.77	Well Temporarily Offline to Remediate SSO Event
NILCW003	8/26/2021 16:53	8/28/2021 11:07	1.76	Well Temporarily Offline to Remediate SSO Event
NILCW004	8/26/2021 16:58	8/28/2021 11:10	1.76	Well Temporarily Offline to Remediate SSO Event
NIHC17-7	8/28/2021 7:52	9/8/2021 15:26	11.32	Well Temporarily Offline to Remediate SSO Event
NIHC17-6	8/28/2021 8:53	9/8/2021 15:08	11.26	Well Temporarily Offline to Remediate SSO Event
NIHC17-5	8/28/2021 9:23	9/8/2021 14:58	11.23	Well Temporarily Offline to Remediate SSO Event
NIHC17-1	8/28/2021 9:42	9/10/2021 15:55	13.26	Well Temporarily Offline to Remediate SSO Event
NILEW757	8/28/2021 10:52	8/30/2021 10:14	1.97	Well Temporarily Offline to Remediate SSO Event
NILCW001	8/28/2021 10:59	8/30/2021 10:28	1.98	Well Temporarily Offline to Remediate SSO Event
NILCW002	8/28/2021 11:04	8/30/2021 11:07	2.00	Well Temporarily Offline to Remediate SSO Event
NILCW003	8/28/2021 11:08	9/2/2021 9:35	4.94	Well Temporarily Offline to Remediate SSO Event
NILCW004	8/28/2021 11:11	9/1/2021 11:18	4.01	Well Temporarily Offline to Remediate SSO Event
NISS17-2	8/30/2021 10:04	9/1/2021 8:57	1.95	Well Temporarily Offline to Remediate SSO Event
NILEW757	8/30/2021 10:18	9/1/2021 8:39	1.93	Well Temporarily Offline to Remediate SSO Event
NILCW001	8/30/2021 10:29	9/1/2021 11:13	2.03	Well Temporarily Offline to Remediate SSO Event
NILCW002	8/30/2021 11:08	9/8/2021 14:36	9.14	Well Temporarily Offline to Remediate SSO Event
NILEW757	9/1/2021 08:54	9/3/2021 14:47	2.25	Well Temporarily Offline to Remediate SSO Event
NILEW757	9/1/2021 8:55	9/3/2021 14:47	2.25	Well Temporarily Offline to Remediate SSO Event
NISS17-2	9/1/2021 09:00	9/9/2021 11:25	8.10	Well Temporarily Offline to Remediate SSO Event
NILCW001	9/1/2021 11:15	9/2/2021 09:39	0.93	Well Temporarily Offline to Remediate SSO Event
NILCW004	9/1/2021 11:20	10/29/2021 16:33	58.22	Well Temporarily Offline to Remediate SSO Event
NIHC17-1	9/2/2021 10:27	9/10/2021 15:55	8.23	Well Temporarily Offline to Remediate SSO Event
NILEW757	9/3/2021 14:49	9/8/2021 14:22	4.98	Well Temporarily Offline to Remediate SSO Event
NILEW757	9/8/2021 14:22	9/9/2021 11:48	0.89	Well Temporarily Offline to Remediate SSO Event

**Table 2. Individual Well Startups, Shutdowns and Decommissions
Newby Island Landfill, Milpitas, California
(August 1, 2021 through January 31, 2022)**

Well ID	Shutdown	Start-up	Days Offline	Reason for Shutdown/Startup
NILCW003	9/8/2021 14:30	9/13/2021 17:35	5.13	Well Temporarily Offline to Remediate SSO Event
NILCW002	9/8/2021 14:36	9/9/2021 12:18	0.90	Well Temporarily Offline to Remediate SSO Event
NILCW001	9/8/2021 14:39	9/9/2021 12:00	0.89	Well Temporarily Offline to Remediate SSO Event
NIHC17-5	9/8/2021 14:58	9/10/2021 15:45	2.03	Well Temporarily Offline to Remediate SSO Event
NIHC17-4	9/8/2021 15:02	10/21/2021 13:51	42.95	Well Temporarily Offline to Remediate SSO Event
NIHC17-4	9/8/2021 15:03	9/17/2021 15:36	9.02	Well Temporarily Offline to Remediate SSO Event
NIHC17-6	9/8/2021 15:08	9/10/2021 11:11	1.84	Well Temporarily Offline to Remediate SSO Event
NIHC17-7	9/8/2021 15:26	9/20/2021 13:43	11.93	Well Temporarily Offline to Remediate SSO Event
NILEW757	9/9/2021 11:48	10/13/2021 10:39	33.95	Well Temporarily Offline to Remediate SSO Event
NISS17-2	9/10/2021 16:12	9/13/2021 15:14	2.96	Well Temporarily Offline to Remediate SSO Event
NILCW001	9/11/2021 16:38	9/13/2021 17:22	2.03	Well Temporarily Offline to Remediate SSO Event
NILEW726*	9/14/2021 00:00		140.00	Well Temporarily Offline Due to Filling (actively offline)
NILCW001	9/14/2021 16:18	10/18/2021 16:56	34.03	Well Temporarily Offline to Remediate SSO Event
NILCW002	9/14/2021 16:21	10/18/2021 17:03	34.03	Well Temporarily Offline to Remediate SSO Event
NILCW003	9/14/2021 16:45	10/18/2021 17:09	34.02	Well Temporarily Offline to Remediate SSO Event
NISS17-2	9/14/2021 17:03	10/13/2021 10:52	28.74	Well Temporarily Offline to Remediate SSO Event
NIHC17-5	9/14/2021 17:54	9/15/2021 11:45	0.74	Well Temporarily Offline to Remediate SSO Event
NIHC17-1	9/15/2021 12:28	9/15/2021 12:30	0.00	Well Temporarily Offline to Remediate SSO Event
NILEW694	9/16/2021	N/A	N/A	Vertical Well Decommissioning
NIHC17-5	9/16/2021 14:40	10/7/2021 15:14	21.02	Well Temporarily Offline to Remediate SSO Event
NIHC17-1	9/16/2021 15:25	10/11/2021 08:49	24.72	Well Temporarily Offline to Remediate SSO Event
NIHC17-6	9/17/2021 16:00	9/29/2021 15:20	11.97	Well Temporarily Offline to Remediate SSO Event
NIHC17-7	9/24/2021 15:42	10/7/2021 10:55	12.80	Well Temporarily Offline to Remediate SSO Event
NILEW698	10/4/21 9:47	N/A	N/A	Vertical Well Decommissioning
NILEW656	10/4/21 10:36	N/A	N/A	Vertical Well Decommissioning
NILW574A	10/4/21 11:14	N/A	N/A	Vertical Well Decommissioning
NILW573A	10/4/21 11:50	N/A	N/A	Vertical Well Decommissioning
NILEW661	10/4/21 12:53	N/A	N/A	Vertical Well Decommissioning
NILEW685	10/4/21 13:04	N/A	N/A	Vertical Well Decommissioning
NILEW217	10/5/21 13:32	N/A	N/A	Vertical Well Decommissioning
NILEW697	10/5/21 9:58	N/A	N/A	Vertical Well Decommissioning
NILEW662	10/7/21 13:30	N/A	N/A	Vertical Well Decommissioning
NILEW463	10/12/2021	N/A	N/A	Vertical Well Decommissioning
NILEW664	10/19/2021 15:08		104.37	Well Temporarily Offline due to Construction Activities (actively offline)
NILMW002	10/22/2021	N/A	N/A	Vertical Well Decommissioning
NILEW451	11/3/2021 17:21		89.28	Well Temporarily Offline due to Construction Activities (actively offline)
NILEW464	11/3/2021 16:49		89.30	Well Temporarily Offline due to Construction Activities (actively offline)
NILEW465	11/3/2021 17:01		89.29	Well Temporarily Offline due to Construction Activities (actively offline)

**Table 2. Individual Well Startups, Shutdowns and Decommissions
Newby Island Landfill, Milpitas, California
(August 1, 2021 through January 31, 2022)**

Well ID	Shutdown	Start-up	Days Offline	Reason for Shutdown/Startup
NILEW496	11/3/2021 15:41		89.35	Well Temporarily Offline due to Construction Activities (actively offline)
NILEW497	11/3/2021 17:12		89.28	Well Temporarily Offline due to Construction Activities (actively offline)
NILEW626	11/3/2021 17:09		89.29	Well Temporarily Offline due to Construction Activities (actively offline)
NILEW066	11/11/2021 13:14		81.45	Well Temporarily Offline due to Construction Activities (actively offline)
NILEW665	11/3/2021 16:51		89.30	Well Temporarily Offline due to Construction Activities (actively offline)
NILEW674	11/3/2021 17:04		89.29	Well Temporarily Offline due to Construction Activities (actively offline)
NILEW711	11/3/2021 16:46		89.30	Well Temporarily Offline due to Construction Activities (actively offline)
NILEW733	11/3/2021 16:59		89.29	Well Temporarily Offline due to Construction Activities (actively offline)
NILEW744	11/3/2021 17:07		89.29	Well Temporarily Offline due to Construction Activities (actively offline)
NILEW745	11/3/2021 17:23		89.28	Well Temporarily Offline due to Construction Activities (actively offline)
NILHC245	N/A	11/10/2021 14:44	N/A	Horizontal Collector Start Up
NIBC-17A	N/A	11/10/2021 17:00	N/A	Bench Collector Start Up
NIHC17-1	11/17/2021	N/A	N/A	Horizontal Collector Decommissioning
NIHC17-2	11/17/2021	N/A	N/A	Horizontal Collector Decommissioning
NIHC17-3	11/17/2021	N/A	N/A	Horizontal Collector Decommissioning
NIHC17-5	11/18/2021	N/A	N/A	Horizontal Collector Decommissioning
NIHC17-6	11/18/2021	N/A	N/A	Horizontal Collector Decommissioning
NIHC17-7	11/18/2021	N/A	N/A	Horizontal Collector Decommissioning
NILEW700	11/19/2021	N/A	N/A	Vertical Well Decommissioning
NILEW707	11/24/2021 11:25		68.52	Well Temporarily Offline due to Construction Activities (actively offline)
NISS17-4	12/1/21 9:51	N/A	N/A	Horizontal Collector Decommissioning
NI3EW40R	12/1/21 15:14	N/A	N/A	Vertical Well Decommissioning
NILHC252	N/A	12/9/2021 16:14	N/A	Horizontal Collector Start Up
NILEW728	12/30/2021	N/A	N/A	Vertical Well Decommissioning
NILEW681	1/12/2022	N/A	N/A	Vertical Well Decommissioning
NILHC246	N/A	1/20/2022 15:00	N/A	Horizontal Collector Start Up
NILHC247	N/A	1/20/2022 15:09	N/A	Horizontal Collector Start Up
NILHC248	N/A	1/20/2022 15:15	N/A	Horizontal Collector Start Up
NILHC249	N/A	1/20/2022 15:18	N/A	Horizontal Collector Start Up
NILHC250	N/A	1/20/2022 15:26	N/A	Horizontal Collector Start Up
NILHC251	N/A	1/20/2022 15:30	N/A	Horizontal Collector Start Up
NIS17-5A	N/A	1/21/2022 13:40	N/A	Vertical Well Start Up
NILW728A	N/A	1/28/2022 14:02	N/A	Vertical Well Start Up

*Well was offline at the end of the reporting period. For reporting purposes, the startup time is calculated as of February 1, 2022 at 00:00.

Note: All well downtime events listed are consistent with applicable Rule 8-34 provisions and BAAQMD permit conditions.

**Table 3. Wells with Positive Pressure
Newby Island Landfill, Milpitas, California
(August 1, 2021 through January 31, 2022)**

Well ID	Date and Time	Initial Static Pressure ("H ₂ O)	Adjusted Static Pressure ("H ₂ O)	Comments
NIBC-17A	1/17/2022 14:58	0.24	-0.02	Adjusted Valve, In Compliance*
NIHC17-1	9/2/2021 10:27	0.15	0.17	Adjusted Valve
NIHC17-1	9/8/2021 8:21	0.04	0.05	Adjusted Valve
NIHC17-1	9/10/2021 15:55	-22.78	-22.77	In Compliance*
NIHC17-1	9/15/2021 12:28	0.06	0.04	Adjusted Valve
NIHC17-1	9/15/2021 12:30	-0.08	-0.08	In Compliance*
NIHC17-1	9/16/2021 15:25	1.68	1.68	Adjusted Valve
NIHC17-1	9/17/2021 13:51	0.98	0.97	Adjusted Valve
NIHC17-1	9/20/2021 12:26	1.72	1.74	Adjusted Valve
NIHC17-1	10/11/2021 8:47	0.14	0.16	Adjusted Valve
NIHC17-1	10/11/2021 8:49	-17.62	-17.56	In Compliance**
NIHC17-2	8/28/2021 9:18	4.67	6.41	Adjusted Valve
NIHC17-2	9/2/2021 10:10	-37.7	1.36	Adjusted Valve
NIHC17-2	9/8/2021 8:09	22.84	22.86	Adjusted Valve
NIHC17-2	9/10/2021 15:18	-50.51	-52.13	In Compliance*
NIHC17-2	9/14/2021 17:36	2.75	3.24	Adjusted Valve
NIHC17-2	9/14/2021 17:38	0.72	1.14	Second Reading
NIHC17-2	9/15/2021 11:40	7.91	7.93	Adjusted Valve
NIHC17-2	9/16/2021 14:35	3.21	3.23	Adjusted Valve
NIHC17-2	9/17/2021 13:10	0.34	0.35	Adjusted Valve
NIHC17-2	9/20/2021 12:35	0.02	0.04	Adjusted Valve
NIHC17-2	10/7/2021 15:20	4.65	-55.28	In Compliance**
NIHC17-3	8/28/2021 9:13	9.54	11.04	Adjusted Valve
NIHC17-3	9/2/2021 10:06	11.3	11.35	Adjusted Valve
NIHC17-3	9/8/2021 8:13	17.53	17.97	Adjusted Valve
NIHC17-3	9/10/2021 15:23	-48.19	-46.44	In Compliance*
NIHC17-3	9/14/2021 17:41	19.98	20	Adjusted Valve
NIHC17-3	9/14/2021 17:46	23.73	23.73	Second Reading
NIHC17-3	9/15/2021 11:37	22.16	22.17	Adjusted Valve
NIHC17-3	9/15/2021 11:38	21.8	21.82	Second Reading
NIHC17-3	9/16/2021 14:33	22.99	23.01	Adjusted Valve
NIHC17-3	9/17/2021 13:07	22.65	22.65	Adjusted Valve
NIHC17-3	9/20/2021 12:32	18.09	19.22	Adjusted Valve
NIHC17-3	10/7/2021 15:25	-55.99	-56.02	In Compliance**
NIHC17-4	9/8/2021 15:02	-44.08	0.01	Adjusted Valve
NIHC17-4	9/17/2021 15:36	1.43	1.42	Adjusted Valve
NIHC17-4	9/17/2021 15:38	1.34	1.35	Second Reading

**Table 3. Wells with Positive Pressure
Newby Island Landfill, Milpitas, California
(August 1, 2021 through January 31, 2022)**

Well ID	Date and Time	Initial Static Pressure ("H ₂ O)	Adjusted Static Pressure ("H ₂ O)	Comments
NIHC17-4	9/21/2021 13:41	1.26	1.29	Adjusted Valve
NIHC17-4	10/4/2021 16:25	1.48	0.68	Adjusted Valve
NIHC17-4	10/4/2021 16:26	0.98	0.98	Second Reading
NIHC17-4	10/21/2021 13:50	0.09	-0.02	Adjusted Valve, In Compliance**
NIHC17-5	9/8/2021 14:58	0.05	0.04	Adjusted Valve
NIHC17-5	9/8/2021 14:58	0.05	0.04	Second Reading
NIHC17-5	9/10/2021 15:45	-51.36	-52.1	In Compliance*
NIHC17-5	9/14/2021 17:54	0.04	0.04	Adjusted Valve
NIHC17-5	9/14/2021 17:59	0.02	0.03	Second Reading
NIHC17-5	9/15/2021 11:43	0.03	0.01	Adjusted Valve
NIHC17-5	9/15/2021 11:45	-0.1	-0.1	In Compliance*
NIHC17-5	9/16/2021 14:40	0.3	0.29	Adjusted Valve
NIHC17-5	9/17/2021 13:32	0.12	0.11	Adjusted Valve
NIHC17-5	10/7/2021 15:14	0.02	0.03	Adjusted Valve
NIHC17-5	10/7/2021 15:15	0.02	0.03	Second Reading
NIHC17-5	10/26/2021 14:40	0.02	0.01	Adjusted Valve
NIHC17-5	11/8/2021 17:21	0.51	0.02	Well Permanently Decommissioned Due to Poor Gas Quality
NIHC17-6	9/8/2021 15:08	0.04	0.04	Adjusted Valve
NIHC17-6	9/10/2021 11:11	-5.52	-5.57	In Compliance*
NIHC17-6	9/17/2021 16:00	0.02	0.02	Adjusted Valve
NIHC17-6	9/17/2021 16:02	0.24	0.2	Second Reading
NIHC17-6	9/29/2021 15:17	0.64	-0.53	Adjusted Valve, In Compliance*
NIHC17-7	9/8/2021 15:26	0.01	0	Adjusted Valve
NIHC17-7	9/10/2021 11:33	2.17	2.19	Adjusted Valve
NIHC17-7	9/20/2021 13:43	-0.47	-0.46	In Compliance*
NIHC17-7	9/24/2021 15:42	2.01	2.02	Adjusted Valve
NIHC17-7	9/24/2021 15:44	1.5	1.51	Second Reading
NIHC17-7	10/7/2021 10:52	0.67	-53.74	Adjusted Valve, In Compliance*
NIHC-245	12/27/2021 16:22	0.02	-0.01	Adjusted Valve, In Compliance*
NIL3EW31	9/9/2021 16:50	5.58	5.58	Adjusted Valve
NIL3EW31	9/9/2021 16:51	4.78	5.26	Second Reading
NIL3EW31	9/17/2021 15:02	-35.75	0	In Compliance*
NIL3EW31	9/17/2021 15:04	1.36	1.39	Adjusted Valve
NIL3EW31	9/20/2021 15:22	16.82	16.82	Adjusted Valve

**Table 3. Wells with Positive Pressure
Newby Island Landfill, Milpitas, California
(August 1, 2021 through January 31, 2022)**

Well ID	Date and Time	Initial Static Pressure ("H ₂ O)	Adjusted Static Pressure ("H ₂ O)	Comments
NIL3EW31	9/20/2021 15:23	16.66	16.67	Second Reading
NIL3EW31	9/21/2021 14:58	17.84	17.84	Adjusted Valve
NIL3EW31	10/14/2021 10:13	15.88	-1.12	Adjusted Valve, In Compliance**
NIL3EW31	11/2/2021 15:55	3.09	-0.5	Adjusted Valve, In Compliance*
NILCW001	8/20/2021 10:40	0.53	0.53	Adjusted Valve
NILCW001	8/20/2021 10:42	0.65	0.65	Second Reading
NILCW001	8/26/2021 16:32	-1.17	-1.17	In Compliance*
NILCW001	8/28/2021 10:58	0.4	0.63	Adjusted Valve
NILCW001	8/30/2021 10:28	-2.81	-2.81	In Compliance*
NILCW001	9/1/2021 11:13	1.45	1.45	Adjusted Valve
NILCW001	9/1/2021 11:15	1.48	1.49	Second Reading
NILCW001	9/2/2021 9:39	1.1	1.13	Adjusted Valve
NILCW001	9/8/2021 14:39	1.48	1.48	Adjusted Valve
NILCW001	9/8/2021 14:39	1.48	1.48	Second Reading
NILCW001	9/9/2021 12:00	-0.45	-0.47	In Compliance*
NILCW001	9/11/2021 16:38	0.73	0.74	Adjusted Valve
NILCW001	9/13/2021 17:22	-1.41	-1.46	In Compliance*
NILCW001	9/14/2021 16:18	1.55	1.56	Adjusted Valve
NILCW001	9/14/2021 16:19	1.57	1.57	Second Reading
NILCW001	9/15/2021 10:28	1.38	1.37	Adjusted Valve
NILCW001	9/15/2021 10:29	1.36	1.36	Second Reading
NILCW001	9/16/2021 12:46	1.65	1.65	Adjusted Valve
NILCW001	9/17/2021 12:25	1.34	1.35	Adjusted Valve
NILCW001	9/24/2021 15:25	1.16	1.16	Adjusted Valve
NILCW001	10/4/2021 16:01	1.37	1.39	Adjusted Valve
NILCW001	10/12/2021 10:48	1.42	1.34	Adjusted Valve
NILCW001	10/12/2021 10:49	1.52	1.54	Second Reading
NILCW001	10/18/2021 16:54	1.17	-0.04	Adjusted Valve, In Compliance**
NILCW002	8/28/2021 11:03	0.33	0.34	Adjusted Valve
NILCW002	8/30/2021 11:07	-0.04	-0.06	In Compliance*
NILCW002	9/8/2021 14:36	0.95	0.93	Adjusted Valve
NILCW002	9/9/2021 12:18	-0.02	-0.04	In Compliance*
NILCW002	9/14/2021 16:21	0.91	0.91	Adjusted Valve
NILCW002	9/14/2021 16:23	0.84	0.85	Second Reading
NILCW002	9/15/2021 10:32	0.7	0.71	Adjusted Valve
NILCW002	9/15/2021 10:33	0.73	0.73	Second Reading

**Table 3. Wells with Positive Pressure
Newby Island Landfill, Milpitas, California
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Well ID	Date and Time	Initial Static Pressure ("H ₂ O)	Adjusted Static Pressure ("H ₂ O)	Comments
NILCW002	9/16/2021 12:48	0.89	0.92	Adjusted Valve
NILCW002	9/17/2021 12:27	0.8	0.8	Adjusted Valve
NILCW002	9/24/2021 15:13	0.64	0.65	Adjusted Valve
NILCW002	10/4/2021 16:04	0.69	0.7	Adjusted Valve
NILCW002	10/12/2021 11:10	1.05	1.04	Adjusted Valve
NILCW002	10/12/2021 11:14	0.85	0.87	Second Reading
NILCW002	10/18/2021 17:02	0.39	-0.01	Adjusted Valve, In Compliance**
NILCW002	10/29/2021 16:25	0.31	-0.8	Adjusted Valve, In Compliance*
NILCW003	8/28/2021 11:07	0.1	0.37	Adjusted Valve
NILCW003	9/2/2021 9:35	0.93	0.93	Adjusted Valve
NILCW003	9/8/2021 14:30	0.94	0.94	Adjusted Valve
NILCW003	9/13/2021 17:35	-0.39	-0.41	In Compliance**
NILCW003	9/14/2021 16:45	1.05	1.06	Adjusted Valve
NILCW003	9/14/2021 16:58	1.1	1.1	Second Reading
NILCW003	9/15/2021 10:40	0.8	0.8	Adjusted Valve
NILCW003	9/15/2021 10:45	0.8	0.8	Second Reading
NILCW003	9/16/2021 12:50	1.08	1.09	Adjusted Valve
NILCW003	9/17/2021 12:56	0.91	0.91	Adjusted Valve
NILCW003	9/24/2021 15:11	0.77	0.78	Adjusted Valve
NILCW003	10/4/2021 16:06	0.9	0.89	Adjusted Valve
NILCW003	10/18/2021 17:06	0.45	-0.13	Adjusted Valve, In Compliance**
NILCW003	10/29/2021 16:29	0.56	-0.86	Adjusted Valve, In Compliance*
NILCW004	8/28/2021 11:10	0.66	0.67	Adjusted Valve
NILCW004	9/1/2021 11:18	1.47	1.47	Adjusted Valve
NILCW004	9/1/2021 11:20	1.39	1.39	Second Reading
NILCW004	9/8/2021 14:33	1.37	1.37	Adjusted Valve
NILCW004	9/24/2021 15:09	1.18	1.2	Adjusted Valve
NILCW004	10/4/2021 16:10	1.34	1.34	Adjusted Valve
NILCW004	10/18/2021 17:12	0.6	0.53	Adjusted Valve
NILCW004	10/18/2021 17:13	0.66	0.67	Second Reading
NILCW004	10/29/2021 16:33	-0.14	-0.27	In Compliance; 75-day notification was submitted on 11/5/21.
NILEW066	8/10/2021 9:34	0.07	0.07	(Initial Exceedance on 7/14) Adjusted Valve
NILEW066	8/10/2021 9:34	0.07	0.07	Second Reading
NILEW066	8/10/2021 9:36	0.13	0.12	Third Reading
NILEW066	8/23/2021 13:19	2.46	2.45	Adjusted Valve
NILEW066	8/23/2021 13:20	2.4	2.41	Second Reading
NILEW066	9/10/2021 9:06	1.83	1.87	Adjusted Valve

**Table 3. Wells with Positive Pressure
Newby Island Landfill, Milpitas, California
(August 1, 2021 through January 31, 2022)**

Well ID	Date and Time	Initial Static Pressure ("H ₂ O)	Adjusted Static Pressure ("H ₂ O)	Comments
NILEW066	9/10/2021 9:08	1.75	1.82	Second Reading
NILEW066	9/16/2021 15:58	2.91	2.91	Adjusted Valve
NILEW066	9/16/2021 16:02	2.85	2.86	Second Reading
NILEW066	10/15/2021 9:23	1.77	1.78	Adjusted Valve
NILEW066	10/15/2021 9:50	1.77	1.79	Second Reading
NILEW066	10/22/2021 12:58	3.96	3.95	Adjusted Valve
NILEW066	11/11/2021 13:14	6.59	6.6	Adjusted Valve (Well was temporarily taken offline due to construction activities); 75-day notification was submitted on 9/27/21.
NILEW110	11/12/2021 15:40	0.49	-0.16	Adjusted Valve, In Compliance*
NILEW451	8/10/2021 15:34	13.88	13.89	(Initial Exceedance was on 7/30) Adjusted Valve
NILEW451	8/10/2021 15:36	13.93	13.94	Second Reading
NILEW451	8/26/2021 8:42	18.07	18.07	Adjusted Valve
NILEW451	8/26/2021 8:44	18.07	18.09	Second Reading
NILEW451	9/15/2021 16:14	13.2	13.22	Adjusted Valve
NILEW451	9/15/2021 16:16	13.28	13.29	Second Reading
NILEW451	9/16/2021 17:01	15	14.98	Adjusted Valve
NILEW451	9/16/2021 17:02	14.99	14.99	Second Reading
NILEW451	10/11/2021 16:10	20.78	20.78	Adjusted Valve
NILEW451	10/22/2021 12:46	19.25	19.25	Adjusted Valve
NILEW451	11/3/2021 17:21	3.87	3.9	Adjusted Valve (Well was temporarily taken offline due to construction activities); 75 day notification was submitted on 10/13/21.
NILEW464	8/10/2021 9:51	1.6	1.6	(Initial Exceedance was on 7/30) Adjusted Valve
NILEW464	8/10/2021 9:52	1.4	1.42	Second Reading
NILEW464	8/23/2021 13:07	3.44	3.44	Adjusted Valve
NILEW464	8/23/2021 13:08	3.43	3.44	Second Reading
NILEW464	9/10/2021 10:42	-6.74	-6.74	In Compliance**
NILEW464	9/22/2021 12:44	4.55	4.54	Adjusted Valve
NILEW464	9/22/2021 12:46	4.55	4.55	Second Reading
NILEW464	10/7/2021 16:44	2.49	2.51	Adjusted Valve
NILEW464	10/22/2021 12:51	0.94	0.93	Adjusted Valve
NILEW464	11/3/2021 16:49	6.72	6.74	Adjusted Valve (Well was temporarily taken offline due to construction activities)

**Table 3. Wells with Positive Pressure
Newby Island Landfill, Milpitas, California
(August 1, 2021 through January 31, 2022)**

Well ID	Date and Time	Initial Static Pressure ("H ₂ O)	Adjusted Static Pressure ("H ₂ O)	Comments
NILEW465	8/10/2021 9:32	1.74	1.74	(Initial Exceedance was on 7/14) Adjusted Valve
NILEW465	8/10/2021 9:34	1.71	1.72	Second Reading
NILEW465	8/23/2021 13:13	4.13	4.13	Adjusted Valve
NILEW465	8/23/2021 13:16	4.18	4.18	Second Reading
NILEW465	9/10/2021 9:02	2.35	2.36	Adjusted Valve
NILEW465	9/10/2021 9:03	2.48	2.47	Second Reading
NILEW465	9/16/2021 15:52	0.37	0.38	Adjusted Valve
NILEW465	9/16/2021 15:54	0.25	0.28	Second Reading
NILEW465	10/11/2021 15:16	0.04	0.07	Adjusted Valve
NILEW465	10/22/2021 13:01	3.47	3.47	Adjusted Valve
NILEW465	11/3/2021 17:01	7.3	7.29	Adjusted Valve (Well was temporarily taken offline due to construction activities); 75 day notification was submitted on 9/27/21.
NILEW476	9/15/2021 10:35	5.2	0.91	Adjusted Valve
NILEW476	9/15/2021 10:36	0.71	0.72	Second Reading
NILEW476	9/29/2021 12:02	-46.91	-26.42	In Compliance*
NILEW479	9/15/2021 10:22	1.56	0.4	Adjusted Valve
NILEW479	9/15/2021 10:24	0.99	1.43	Second Reading
NILEW479	9/29/2021 11:41	-44.34	-45.73	In Compliance*
NILEW482	9/9/2021 16:25	4.65	4.65	Adjusted Valve
NILEW482	9/9/2021 16:26	3.42	3.93	Second Reading
NILEW482	9/20/2021 11:14	-39.13	-39.92	In Compliance*
NILEW496	8/10/2021 10:06	13.02	13.03	(Initial Exceedance was on 7/2) Adjusted Valve
NILEW496	8/10/2021 10:07	13.04	13.04	Second Reading
NILEW496	8/30/2021 16:16	16.79	16.79	Adjusted Valve
NILEW496	8/30/2021 16:18	16.19	16.83	Second Reading
NILEW496	9/10/2021 10:31	15.63	15.64	Adjusted Valve
NILEW496	9/10/2021 10:32	15.55	15.59	Second Reading
NILEW496	9/22/2021 12:32	17.01	17.04	Adjusted Valve
NILEW496	10/7/2021 16:28	13.27	-11.51	In Compliance; 75 day notification was submitted on 9/15/21.
NILEW496	10/22/2021 11:36	13.45	13.44	Adjusted Valve
NILEW496	10/22/2021 11:40	13.38	13.39	Second Reading*
NILEW496	11/3/2021 15:41	0.01	0.01	Adjusted Valve (Well was temporarily taken offline due to construction activities)

**Table 3. Wells with Positive Pressure
Newby Island Landfill, Milpitas, California
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Well ID	Date and Time	Initial Static Pressure ("H ₂ O)	Adjusted Static Pressure ("H ₂ O)	Comments
NILEW497	8/10/2021 9:46	20.05	20.06	(Initial Exceedance was on 7/30) Adjusted Valve
NILEW497	8/10/2021 9:48	20.07	20.06	Second Reading
NILEW497	8/23/2021 13:03	23.95	23.96	Adjusted Valve
NILEW497	8/23/2021 13:05	19.6	19.56	Second Reading
NILEW497	9/10/2021 10:45	21.73	21.74	Adjusted Valve
NILEW497	9/10/2021 10:52	21.62	21.65	Second Reading
NILEW497	9/16/2021 17:04	22.87	22.88	Adjusted Valve
NILEW497	9/16/2021 17:06	22.99	22.98	Second Reading
NILEW497	10/11/2021 16:13	9.07	9.09	Adjusted Valve
NILEW497	10/22/2021 12:48	7.38	7.36	Adjusted Valve
NILEW497	11/3/2021 17:12	7.33	7.31	Adjusted Valve (Well was temporarily taken offline due to construction activities); 75 day notification was submitted on 10/13/21.
NILEW514	1/14/2022 15:54	17.8	-33.88	Adjusted Valve, In Compliance*
NILEW599	11/16/2021 9:36	13.94	-6.03	Adjusted Valve, In Compliance*
NILEW601	12/10/2021 16:53	24.92	-31.72	Adjusted Valve, In Compliance*
NILEW604	9/13/2021 9:34	1.5	-10.65	Adjusted Valve, In Compliance*
NILEW607	9/22/2021 10:04	10.47	10.48	Adjusted Valve
NILEW607	9/22/2021 10:07	10.52	10.55	Second Reading
NILEW607	10/5/2021 13:43	-52.63	-52.62	In Compliance*
NILEW620	9/27/2021 12:14	8.55	-0.44	Adjusted Valve, In Compliance*
NILEW626	8/10/2021 15:28	3.58	3.6	(Initial Exceedance was on 7/30) Adjusted Valve
NILEW626	8/10/2021 15:30	3.67	3.68	Second Reading
NILEW626	8/26/2021 8:38	4.01	4	Adjusted Valve
NILEW626	8/26/2021 8:39	4	4	Second Reading
NILEW626	9/14/2021 15:03	5.89	5.94	Adjusted Valve
NILEW626	9/14/2021 15:05	6.06	6.05	Second Reading
NILEW626	9/16/2021 16:04	6.12	6.13	Adjusted Valve
NILEW626	9/16/2021 16:06	6.15	6.16	Second Reading
NILEW626	10/11/2021 15:37	5.9	5.93	Adjusted Valve
NILEW626	10/22/2021 12:53	7.34	7.35	Adjusted Valve
NILEW626	11/3/2021 17:09	9.58	9.59	Adjusted Valve (Well was temporarily taken offline due to construction activities); 75 day notification was submitted on 10/13/21.

**Table 3. Wells with Positive Pressure
Newby Island Landfill, Milpitas, California
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Well ID	Date and Time	Initial Static Pressure ("H ₂ O)	Adjusted Static Pressure ("H ₂ O)	Comments
NILEW628	12/13/2021 16:49	11.82	10.67	Adjusted Valve
NILEW628	12/13/2021 16:51	10.68	10.79	Second Reading
NILEW628	12/17/2021 11:53	11.21	11.21	Adjusted Valve
NILEW628	12/27/2021 17:26	14.49	14.49	Adjusted Valve
NILEW628	1/13/2022 16:22	14.33	14.35	Adjusted Valve
NILEW628	1/21/2022 9:58	13.8	13.8	Adjusted Valve; Well remains in exceedance and compliance will be documented in the next report.
NILEW637	8/17/2021 9:25	18.46	-0.32	Adjusted Valve, In Compliance*
NILEW637	9/3/2021 10:10	4.79	-0.55	Adjusted Valve, In Compliance*
NILEW641	9/13/2021 11:19	0.79	-15.38	Adjusted Valve, In Compliance*
NILEW644	12/2/2021 12:23	0.78	-0.5	Adjusted Valve, In Compliance*
NILEW644	12/27/2021 11:21	2.25	-0.43	Adjusted Valve, In Compliance*
NILEW648	1/28/2022 12:14	80.09	27.92	Adjusted Valve
NILEW648	1/28/2022 12:18	-2.71	-4.77	In Compliance*
NILEW650	12/27/2021 15:36	38.39	-0.27	Adjusted Valve, In Compliance*
NILEW650	1/27/2022 15:16	5.17	-6.98	Adjusted Valve, In Compliance*
NILEW651	9/14/2021 15:10	13.13	13.15	Adjusted Valve
NILEW651	9/14/2021 15:12	13.19	13.19	Second Reading
NILEW651	9/27/2021 11:16	-48.49	-49.74	In Compliance*
NILEW654	1/14/2022 11:11	0.77	-1.57	Adjusted Valve, In Compliance*
NILEW659	9/8/2021 8:40	2	-0.56	Adjusted Valve, In Compliance*
NILEW664	8/10/2021 9:59	9.74	9.74	Adjusted Valve
NILEW664	8/10/2021 10:00	9.76	9.76	Second Reading
NILEW664	8/30/2021 16:27	11.23	11.25	Adjusted Valve
NILEW664	9/10/2021 10:35	18.22	18.23	Adjusted Valve
NILEW664	9/10/2021 10:36	18.1	18.13	Second Reading
NILEW664	9/22/2021 12:38	19.54	19.53	Adjusted Valve
NILEW664	10/7/2021 16:48	1.61	1.67	Adjusted Valve
NILEW664	10/19/2021 15:08	3.39	3.33	Adjusted Valve (Well was temporarily taken offline due to construction activities)

**Table 3. Wells with Positive Pressure
Newby Island Landfill, Milpitas, California
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Well ID	Date and Time	Initial Static Pressure ("H ₂ O)	Adjusted Static Pressure ("H ₂ O)	Comments
NILEW665	8/10/2021 14:39	1.01	1.01	(Initial Exceedance was on 7/14) Adjusted Valve
NILEW665	8/10/2021 14:42	0.91	0.91	Second Reading
NILEW665	8/26/2021 8:33	0.86	0.86	Adjusted Valve
NILEW665	8/26/2021 8:35	0.86	0.86	Second Reading
NILEW665	9/14/2021 10:04	0.94	0.96	Adjusted Valve
NILEW665	9/14/2021 10:05	1.05	1.05	Second Reading
NILEW665	9/22/2021 9:41	0.86	0.89	Adjusted Valve
NILEW665	9/22/2021 9:42	1.11	1.13	Second Reading
NILEW665	10/11/2021 15:25	1.74	1.75	Adjusted Valve
NILEW665	10/19/2021 15:04	1.81	1.8	Adjusted Valve
NILEW665	11/3/2021 16:51	3.7	3.7	Adjusted Valve (Well was temporarily taken offline due to construction activities)
NILEW666	8/10/2021 14:34	0.66	0.66	Adjusted Valve
NILEW666	8/10/2021 14:36	0.6	0.62	Second Reading
NILEW666	8/23/2021 13:38	2.11	2.11	Adjusted Valve
NILEW666	9/14/2021 10:09	-0.11	-0.18	In Compliance**
NILEW666	11/3/2021 16:55	3.97	-0.87	Adjusted Valve, In Compliance*
NILEW674	8/23/2021 12:45	0.57	0.57	Adjusted Valve
NILEW674	8/23/2021 12:47	0.54	0.54	Second Reading
NILEW674	9/8/2021 10:58	16.09	16.1	Adjusted Valve
NILEW674	9/8/2021 10:58	16.09	16.1	Second Reading
NILEW674	9/10/2021 9:13	3.04	3.06	Adjusted Valve
NILEW674	9/10/2021 9:16	3.08	3.1	Second Reading
NILEW674	9/16/2021 16:12	4.01	4.04	Adjusted Valve
NILEW674	9/16/2021 16:13	4.13	4.14	Second Reading
NILEW674	10/11/2021 15:41	4.89	4.92	Adjusted Valve
NILEW674	10/22/2021 13:14	5.23	5.24	Adjusted Valve
NILEW674	11/3/2021 17:04	7.32	7.32	Adjusted Valve (Well was temporarily taken offline due to construction activities)
NILEW677	10/26/2021 15:46	0.16	-0.92	Adjusted Valve, In Compliance*
NILEW679	12/2/2021 12:00	0.62	-1.59	Adjusted Valve, In Compliance*
NILEW690	9/17/2021 15:24	-12.24	2.86	Adjusted Valve
NILEW690	9/17/2021 15:26	16.8	16.86	Second Reading
NILEW690	9/29/2021 15:26	20.13	-0.19	Adjusted Valve, In Compliance*

**Table 3. Wells with Positive Pressure
Newby Island Landfill, Milpitas, California
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Well ID	Date and Time	Initial Static Pressure ("H ₂ O)	Adjusted Static Pressure ("H ₂ O)	Comments
NILEW690	1/17/2022 12:46	22.64	-0.18	Adjusted Valve, In Compliance*
NILEW696	9/20/2021 14:26	25.29	25.29	Adjusted Valve
NILEW696	9/20/2021 14:28	25.31	25.31	Second Reading
NILEW696	9/21/2021 14:18	22.74	22.77	Adjusted Valve
NILEW696	10/5/2021 13:37	6.26	6.27	Adjusted Valve
NILEW696	10/14/2021 10:48	8.07	-1.14	Adjusted Valve, In Compliance**
NILEW699	1/13/2022 9:14	0.01	0.01	Adjusted Valve
NILEW699	1/13/2022 9:18	0.01	0.02	Second Reading
NILEW699	1/28/2022 9:55	0.21	0.21	Adjusted Valve; Well remains in exceedance and compliance will be documented in the next report.
NILEW700	10/7/2021 15:05	1.07	1.2	Adjusted Valve
NILEW700	10/7/2021 15:07	1.13	1.14	Second Reading
NILEW700	10/21/2021 16:20	1.6	1.61	Adjusted Valve
NILEW700	11/8/2021 17:11	1.48	1.48	Well Permanently Decommissioned Due to Poor Gas Quality
NILEW701	9/17/2021 14:47	6.35	6.35	Adjusted Valve
NILEW701	9/17/2021 14:48	6.4	6.42	Second Reading
NILEW701	9/20/2021 14:50	13.25	13.25	Adjusted Valve
NILEW701	9/20/2021 14:53	8.38	8.96	Second Reading
NILEW701	9/21/2021 14:24	12.09	12.11	Adjusted Valve
NILEW701	10/14/2021 10:37	3.44	-1.55	Adjusted Valve, In Compliance**
NILEW702	8/27/2021 13:18	2.89	2.89	Adjusted Valve
NILEW702	8/27/2021 13:18	2.89	2.89	Second Reading
NILEW702	8/27/2021 13:20	2.89	2.89	Third Reading
NILEW702	8/27/2021 13:20	2.89	2.89	Fourth Reading
NILEW702	9/8/2021 14:14	3.95	3.95	Adjusted Valve
NILEW702	9/13/2021 17:54	-11.74	-11.75	In Compliance**
NILEW702	9/15/2021 8:41	3.18	3.17	Adjusted Valve
NILEW702	9/15/2021 8:42	3.07	3.08	Second Reading
NILEW702	9/16/2021 11:41	4.2	4.41	Adjusted Valve
NILEW702	9/17/2021 11:09	3.54	3.56	Adjusted Valve
NILEW702	9/29/2021 14:59	2.83	-0.33	Adjusted Valve, In Compliance*
NILEW702	10/18/2021 16:32	1.88	-0.08	Adjusted Valve, In Compliance*
NILEW702	12/9/2021 10:10	0.66	-1.92	Adjusted Valve, In Compliance*
NILEW702	12/30/2021 10:10	0.86	-3.47	Adjusted Valve, In Compliance*

**Table 3. Wells with Positive Pressure
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Well ID	Date and Time	Initial Static Pressure ("H ₂ O)	Adjusted Static Pressure ("H ₂ O)	Comments
NILEW703	9/17/2021 14:53	4.26	4.27	Adjusted Valve
NILEW703	9/17/2021 14:55	4.8	4.8	Second Reading
NILEW703	9/20/2021 15:13	9.84	9.84	Adjusted Valve
NILEW703	9/20/2021 15:20	9.81	9.8	Second Reading
NILEW703	9/21/2021 14:34	9.17	9.21	Adjusted Valve
NILEW703	9/22/2021 14:08	9.76	9.76	Adjusted Valve
NILEW703	9/29/2021 14:56	8.93	2.02	Adjusted Valve
NILEW703	10/14/2021 10:19	1.52	-1.62	Adjusted Valve, In Compliance**
NILEW707	8/10/2021 14:56	10.76	10.78	(Initial Exceedance was on 7/2) Adjusted Valve
NILEW707	8/10/2021 14:57	10.79	10.79	Second Reading
NILEW707	8/26/2021 9:13	10.52	10.51	Adjusted Valve
NILEW707	8/26/2021 9:14	10.44	10.45	Second Reading
NILEW707	9/14/2021 9:47	10.26	10.29	Adjusted Valve
NILEW707	9/14/2021 9:49	10.42	10.45	Second Reading
NILEW707	9/28/2021 14:32	-0.73	-0.71	In Compliance**
NILEW707	11/11/2021 13:03	16.95	16.95	Adjusted Valve
NILEW707	11/11/2021 13:09	16.87	16.89	Second Reading
NILEW707	11/24/2021 11:25	16.58	16.58	Adjusted Valve (Well was temporarily taken offline due to construction activities)
NILEW708	9/20/2021 15:26	55.79	-0.57	Adjusted Valve, In Compliance*
NILEW711	8/10/2021 9:55	0.71	0.71	Adjusted Valve
NILEW711	8/10/2021 9:56	0.62	0.63	Second Reading
NILEW711	8/23/2021 13:44	1.58	1.58	Adjusted Valve
NILEW711	8/23/2021 13:46	1.54	1.55	Second Reading
NILEW711	9/10/2021 10:38	2.12	2.16	Adjusted Valve
NILEW711	9/10/2021 10:40	2.18	2.19	Second Reading
NILEW711	9/22/2021 12:41	5.65	5.65	Adjusted Valve
NILEW711	9/22/2021 12:43	5.65	5.65	Second Reading
NILEW711	10/7/2021 16:42	2.31	2.33	Adjusted Valve
NILEW711	10/19/2021 15:06	2.62	2.63	Adjusted Valve
NILEW711	11/3/2021 16:46	6.87	6.86	Adjusted Valve (Well was temporarily taken offline due to construction activities)
NILEW712	1/8/2022 14:57	1.17	-0.46	Adjusted Valve, In Compliance*
NILEW712	1/21/2022 13:51	1.44	-1.02	Adjusted Valve, In Compliance*
NILEW714	9/29/2021 11:32	0.7	-0.1	Adjusted Valve, In Compliance*

**Table 3. Wells with Positive Pressure
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Well ID	Date and Time	Initial Static Pressure ("H ₂ O)	Adjusted Static Pressure ("H ₂ O)	Comments
NILEW720	8/16/2021 13:22	43.97	-2.25	Adjusted Valve, In Compliance*
NILEW720	10/26/2021 15:38	11.14	-3.47	Adjusted Valve, In Compliance*
NILEW722	9/27/2021 14:43	0.74	-0.18	Adjusted Valve, In Compliance*
NILEW723	11/3/2021 18:15	0.02	-1.68	Adjusted Valve, In Compliance*
NILEW726	8/10/2021 16:28	3.98	3.97	(Initial Exceedance was on 7/14) Adjusted Valve
NILEW726	8/10/2021 16:28	3.98	3.97	Second Reading
NILEW726	8/10/2021 16:30	4.25	4.25	Third Reading
NILEW726	8/26/2021 10:37	8.81	8.8	Adjusted Valve
NILEW726	8/26/2021 10:38	8.76	8.78	Second Reading (Well was temporarily taken offline due to filling)
NILEW733	8/10/2021 15:42	3.06	3.07	(Initial Exceedance was on 7/14) Adjusted Valve
NILEW733	8/10/2021 15:44	3.11	3.11	Second Reading
NILEW733	8/26/2021 8:28	4.01	4.02	Adjusted Valve
NILEW733	8/26/2021 8:29	4.24	4.23	Second Reading
NILEW733	9/14/2021 10:29	-0.82	-0.73	In Compliance; 75 day notification was submitted on 9/27/21.
NILEW733	10/22/2021 13:05	2.82	2.84	Adjusted Valve
NILEW733	10/22/2021 13:07	2.97	2.98	Second Reading
NILEW733	11/3/2021 16:59	7.26	7.28	Adjusted Valve (Well was temporarily taken offline due to construction activities)
NILEW739	1/14/2022 12:53	1.82	-24.83	Adjusted Valve, In Compliance*
NILEW742	8/13/2021 8:44	-0.35	-1.11	(Initial Exceedance was on 7/14) In Compliance**
NILEW744	8/10/2021 9:42	1.34	1.34	Adjusted Valve
NILEW744	8/10/2021 9:49	1.16	1.18	Second Reading
NILEW744	8/13/2021 10:46	2.81	2.81	Adjusted Valve
NILEW744	8/13/2021 10:46	2.81	2.81	Second Reading
NILEW744	8/13/2021 11:01	2.81	2.8	Third Reading
NILEW744	8/23/2021 13:33	1.92	1.92	Adjusted Valve
NILEW744	8/23/2021 13:34	1.92	1.93	Second Reading
NILEW744	9/14/2021 15:00	6.44	6.45	Adjusted Valve
NILEW744	9/14/2021 15:01	7.55	7.63	Second Reading

**Table 3. Wells with Positive Pressure
Newby Island Landfill, Milpitas, California
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Well ID	Date and Time	Initial Static Pressure ("H ₂ O)	Adjusted Static Pressure ("H ₂ O)	Comments
NILEW744	9/16/2021 16:09	2.09	2.09	Adjusted Valve
NILEW744	9/16/2021 16:09	2.1	2.11	Second Reading
NILEW744	10/11/2021 15:40	5.76	5.77	Adjusted Valve
NILEW744	10/22/2021 13:18	3.16	3.16	Adjusted Valve
NILEW744	11/3/2021 17:07	1.97	1.97	Adjusted Valve (Well was temporarily taken offline due to construction activities)
NILEW745	8/10/2021 9:51	0.01	0.02	Adjusted Valve
NILEW745	8/10/2021 9:52	0.2	0.2	Second Reading
NILEW745	8/23/2021 13:49	7.31	7.32	Adjusted Valve
NILEW745	8/23/2021 13:51	7.39	7.4	Second Reading
NILEW745	9/14/2021 15:15	0.53	0.55	Adjusted Valve
NILEW745	9/14/2021 15:16	0.64	0.65	Second Reading
NILEW745	9/16/2021 16:58	2.06	2.06	Adjusted Valve
NILEW745	9/16/2021 16:59	2.09	2.14	Second Reading
NILEW745	10/11/2021 16:07	4.31	4.33	Adjusted Valve
NILEW745	10/22/2021 12:42	7.17	7.17	Adjusted Valve
NILEW745	11/3/2021 17:23	2.83	2.84	Adjusted Valve (Well was temporarily taken offline due to construction activities)
NILEW748	8/6/2021 13:13	3.9	-0.42	Adjusted Valve, In Compliance*
NILEW748	9/22/2021 11:39	5.11	4.56	Adjusted Valve
NILEW748	9/22/2021 11:40	-0.59	-0.61	In Compliance*
NILEW748	10/22/2021 11:24	39.56	-8.85	Adjusted Valve, In Compliance*
NILEW749	11/3/2021 14:38	13.3	-1.59	Adjusted Valve, In Compliance*
NILEW752	12/9/2021 11:47	0.24	-0.88	Adjusted Valve, In Compliance*
NILEW753	11/16/2021 13:51	0.4	-0.01	Adjusted Valve, In Compliance*
NILEW757	8/28/2021 10:51	3.07	3.06	Adjusted Valve
NILEW757	8/30/2021 10:14	-2.36	-2.34	In Compliance*
NILEW757	9/1/2021 8:39	1.84	1.86	Adjusted Valve
NILEW757	9/1/2021 8:54	1.82	1.83	Second Reading
NILEW757	9/3/2021 14:47	2.27	2.28	Adjusted Valve
NILEW757	9/3/2021 14:49	2	2.02	Second Reading
NILEW757	9/8/2021 14:22	3.18	3.2	Adjusted Valve
NILEW757	9/8/2021 14:22	3.18	3.2	Second Reading
NILEW757	9/9/2021 11:48	-0.47	-0.49	In Compliance*

**Table 3. Wells with Positive Pressure
Newby Island Landfill, Milpitas, California
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Well ID	Date and Time	Initial Static Pressure ("H ₂ O)	Adjusted Static Pressure ("H ₂ O)	Comments
NILEW757	9/10/2021 8:28	3.77	3.79	Adjusted Valve
NILEW757	9/10/2021 8:44	1.82	1.87	Second Reading
NILEW757	9/11/2021 16:21	2.46	2.46	Adjusted Valve
NILEW757	9/14/2021 15:59	5.05	5.05	Adjusted Valve
NILEW757	9/14/2021 15:59	5.05	5.05	Second Reading
NILEW757	9/14/2021 16:15	5.02	5.02	Third Reading
NILEW757	9/15/2021 10:12	4.51	4.52	Adjusted Valve
NILEW757	9/15/2021 10:14	4.59	4.58	Second Reading
NILEW757	9/16/2021 12:30	5	5.04	Adjusted Valve
NILEW757	9/17/2021 12:01	4.71	4.73	Adjusted Valve
NILEW757	9/20/2021 16:41	4.24	4.24	Adjusted Valve
NILEW757	9/20/2021 16:43	4.21	4.22	Second Reading
NILEW757	9/21/2021 15:37	4.27	4.28	Adjusted Valve
NILEW757	9/22/2021 15:20	4.18	4.18	Adjusted Valve
NILEW757	9/24/2021 13:25	4.52	4.54	Adjusted Valve
NILEW757	9/30/2021 12:30	4.84	4.84	Adjusted Valve
NILEW757	10/4/2021 12:22	4.59	4.59	Adjusted Valve
NILEW757	10/5/2021 11:22	4.14	4.15	Adjusted Valve
NILEW757	10/6/2021 15:14	2.38	2.44	Adjusted Valve
NILEW757	10/7/2021 10:41	2.07	2.09	Adjusted Valve
NILEW757	10/8/2021 10:26	2.23	2.22	Adjusted Valve
NILEW757	10/11/2021 13:39	2.53	2.55	Adjusted Valve
NILEW757	10/12/2021 9:42	2.23	2.27	Adjusted Valve
NILEW757	10/13/2021 10:36	2.22	-0.02	Adjusted Valve, In Compliance**
NILEW757	11/1/2021 12:53	7.67	-0.86	Adjusted Valve, In Compliance*
NILEW759	11/5/2021 14:20	0.47	-0.84	Adjusted Valve, In Compliance*
NILEW761	12/27/2021 10:38	0.1	-1.31	Adjusted Valve, In Compliance*
NILEW762	9/27/2021 13:56	0.85	-0.37	Adjusted Valve, In Compliance*
NILEW762	1/26/2022 14:12	0.28	-1.02	Adjusted Valve, In Compliance*
NILEW767	11/1/2021 17:07	9.11	-0.09	Adjusted Valve, In Compliance*
NILEW767	11/18/2021 10:54	6.12	-1.66	Adjusted Valve, In Compliance*
NILEW768	9/24/2021 15:04	1.55	1.55	Adjusted Valve
NILEW768	9/24/2021 15:07	1.58	1.59	Second Reading
NILEW768	10/4/2021 16:14	1.57	-0.21	Adjusted Valve, In Compliance*
NILHC207	9/17/2021 15:12	-2.77	0.01	Adjusted Valve

**Table 3. Wells with Positive Pressure
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Well ID	Date and Time	Initial Static Pressure ("H ₂ O)	Adjusted Static Pressure ("H ₂ O)	Comments
NILHC207	9/17/2021 15:14	0.24	0.18	Second Reading
NILHC207	9/20/2021 15:56	0.11	0.12	Adjusted Valve
NILHC207	9/20/2021 15:59	0.07	0.08	Second Reading
NILHC207	9/21/2021 15:08	0.06	0.06	Adjusted Valve
NILHC207	9/29/2021 14:46	0.44	-0.71	Adjusted Valve, In Compliance*
NILHC244	12/27/2021 16:33	0.13	-0.06	Adjusted Valve, In Compliance*
NILHC244	1/28/2022 12:19	0.08	-0.12	Adjusted Valve, In Compliance*
NILHC246	1/20/2022 15:00	1.34	1.33	Adjusted Valve
NILHC246	1/20/2022 15:01	1.33	1.32	Second Reading
NILHC246	1/24/2022 13:01	0.96	0.95	Adjusted Valve
NILHC246	1/31/2022 13:45	0.98	0.99	Adjusted Valve
NILHC246	1/31/2022 13:48	1	1	Adjusted Valve; Well remains in exceedance and compliance will be documented in the next report.
NILHC247	1/20/2022 15:09	1.31	1.31	Adjusted Valve
NILHC247	1/20/2022 15:12	1.32	1.32	Second Reading
NILHC247	1/24/2022 13:06	1.32	1.32	Adjusted Valve
NILHC247	1/31/2022 13:49	0.84	0.92	Adjusted Valve
NILHC247	1/31/2022 13:51	1.02	1.01	Adjusted Valve; Well remains in exceedance and compliance will be documented in the next report.
NILHC248	1/20/2022 15:15	1.23	1.24	Adjusted Valve
NILHC248	1/20/2022 15:16	1.22	1.22	Second Reading
NILHC248	1/24/2022 13:11	1.3	1.3	Adjusted Valve
NILHC248	1/31/2022 13:53	0.99	0.99	Adjusted Valve
NILHC248	1/31/2022 13:55	0.96	0.96	Adjusted Valve; Well remains in exceedance and compliance will be documented in the next report.
NILHC249	1/20/2022 15:18	1.19	1.19	Adjusted Valve
NILHC249	1/20/2022 15:24	1.19	1.19	Second Reading
NILHC249	1/24/2022 13:14	1.26	1.26	Adjusted Valve
NILHC249	1/31/2022 13:56	0.99	0.98	Adjusted Valve
NILHC249	1/31/2022 13:59	0.95	0.95	Adjusted Valve; Well remains in exceedance and compliance will be documented in the next report.
NILHC250	1/20/2022 15:26	1.16	1.16	Adjusted Valve
NILHC250	1/20/2022 15:28	1.12	1.13	Second Reading
NILHC250	1/24/2022 13:19	1.24	1.26	Adjusted Valve

**Table 3. Wells with Positive Pressure
Newby Island Landfill, Milpitas, California
(August 1, 2021 through January 31, 2022)**

Well ID	Date and Time	Initial Static Pressure ("H ₂ O)	Adjusted Static Pressure ("H ₂ O)	Comments
NILHC250	1/31/2022 14:01	0.9	0.91	Adjusted Valve
NILHC250	1/31/2022 14:03	0.88	0.88	Adjusted Valve; Well remains in exceedance and compliance will be documented in the next report.
NILHC251	1/20/2022 15:30	0.41	0.41	Adjusted Valve
NILHC251	1/20/2022 15:33	0.44	0.43	Second Reading
NILHC251	1/24/2022 13:24	0.39	0.35	Adjusted Valve
NILHC251	1/31/2022 14:05	0.07	-0.01	Adjusted Valve, In Compliance*
NILMW015	8/30/2021 11:34	0.7	0.71	Adjusted Valve
NILMW015	8/30/2021 11:34	0.7	0.71	Second Reading
NILMW015	8/30/2021 11:35	0.66	0.67	Third Reading
NILMW015	9/15/2021 16:29	0.43	0.44	Adjusted Valve
NILMW015	9/15/2021 16:31	0.43	0.43	Second Reading
NILMW015	10/13/2021 12:18	0.56	0.57	Adjusted Valve
NILMW015	10/26/2021 12:31	0.6	0.6	Adjusted Valve
NILMW015	11/5/2021 15:58	-4.05	-3.83	In Compliance; 75 day notification was submitted on 11/6/21.
NILMW017	8/10/2021 15:33	0.31	-4.15	Adjusted Valve, In Compliance*
NILMW020	12/17/2021 11:11	0.2	-0.25	Adjusted Valve, In Compliance*
NILMW021	8/20/2021 15:56	0.63	-1.43	Adjusted Valve, In Compliance*
NILMW023	8/10/2021 15:24	3.51	-9.31	Adjusted Valve, In Compliance*
NILMW027	11/16/2021 14:29	5.89	-4.61	Adjusted Valve, In Compliance*
NILMW032	8/30/2021 15:56	0.7	0.72	Adjusted Valve
NILMW032	8/30/2021 15:58	0.61	0.68	Second Reading
NILMW032	9/2/2021 12:26	-2.47	-1.45	In Compliance*
NILMW034	11/2/2021 13:33	5.05	-0.05	Adjusted Valve, In Compliance*
NILW632A	8/6/2021 8:56	0.97	1	Adjusted Valve
NILW632A	8/6/2021 13:27	1.57	-0.67	Adjusted Valve, In Compliance*
NILW632A	8/6/2021 13:27	1.57	-0.67	Adjusted Valve, In Compliance*
NISS17-1	9/8/2021 13:42	0.01	0.01	Adjusted Valve
NISS17-1	9/9/2021 11:20	-3.26	-3.25	In Compliance*
NISS17-1	9/17/2021 11:28	0.54	0.55	Adjusted Valve

**Table 3. Wells with Positive Pressure
Newby Island Landfill, Milpitas, California
(August 1, 2021 through January 31, 2022)**

Well ID	Date and Time	Initial Static Pressure ("H ₂ O)	Adjusted Static Pressure ("H ₂ O)	Comments
NISS17-1	9/20/2021 12:42	2.68	2.67	Adjusted Valve
NISS17-1	9/29/2021 15:05	0.7	-0.72	Adjusted Valve, In Compliance*
NISS17-2	9/1/2021 8:57	8.32	8.32	Adjusted Valve
NISS17-2	9/1/2021 9:00	7.72	7.74	Second Reading
NISS17-2	9/2/2021 9:21	4.65	4.66	Adjusted Valve
NISS17-2	9/3/2021 13:55	11.17	11.63	Adjusted Valve
NISS17-2	9/3/2021 14:08	13.63	13.65	Second Reading
NISS17-2	9/8/2021 13:17	15.35	15.35	Adjusted Valve
NISS17-2	9/8/2021 13:17	15.35	15.35	Second Reading
NISS17-2	9/9/2021 11:25	-5.79	-5.16	In Compliance*
NISS17-2	9/10/2021 16:12	6.56	6.57	Adjusted Valve
NISS17-2	9/10/2021 16:14	6.31	6.32	Second Reading
NISS17-2	9/11/2021 16:09	8.27	8.29	Adjusted Valve
NISS17-2	9/13/2021 15:14	-1.66	-1.73	In Compliance*
NISS17-2	9/14/2021 17:03	16.63	16.64	Adjusted Valve
NISS17-2	9/14/2021 17:05	13.79	13.82	Second Reading
NISS17-2	9/15/2021 9:29	14.39	14.41	Adjusted Valve
NISS17-2	9/15/2021 9:32	14.09	14.11	Second Reading
NISS17-2	9/16/2021 11:57	15.8	15.8	Adjusted Valve
NISS17-2	9/16/2021 11:57	15.8	15.8	Second Reading
NISS17-2	9/17/2021 11:26	13.36	13.39	Adjusted Valve
NISS17-2	9/20/2021 16:25	10.49	10.48	Adjusted Valve
NISS17-2	9/20/2021 16:26	10.19	10.2	Second Reading
NISS17-2	9/21/2021 15:21	10.68	10.72	Adjusted Valve
NISS17-2	9/22/2021 14:16	10.13	10.14	Adjusted Valve
NISS17-2	9/24/2021 13:44	10.45	10.45	Adjusted Valve
NISS17-2	9/30/2021 12:16	9.84	9.89	Adjusted Valve
NISS17-2	9/30/2021 12:16	9.84	9.89	Second Reading
NISS17-2	10/4/2021 11:56	9.66	9.67	Adjusted Valve
NISS17-2	10/5/2021 11:46	9.28	9.28	Adjusted Valve
NISS17-2	10/6/2021 15:19	2.52	2.54	Adjusted Valve
NISS17-2	10/7/2021 10:25	2.77	2.77	Adjusted Valve
NISS17-2	10/8/2021 9:44	2.96	3.08	Adjusted Valve
NISS17-2	10/11/2021 13:52	3.52	3.53	Adjusted Valve
NISS17-2	10/12/2021 9:23	2.88	2.89	Adjusted Valve
NISS17-2	10/13/2021 10:49	3.35	-0.33	Adjusted Valve, In Compliance**
NISS17-4	8/9/2021 14:48	-42.11	-41.55	(Initial Exceedance was on 6/29) In Compliance**
NISS17-4	9/17/2021 14:16	2.57	2.59	Adjusted Valve
NISS17-4	9/17/2021 14:17	1.18	1.6	Second Reading

**Table 3. Wells with Positive Pressure
Newby Island Landfill, Milpitas, California
(August 1, 2021 through January 31, 2022)**

Well ID	Date and Time	Initial Static Pressure ("H ₂ O)	Adjusted Static Pressure ("H ₂ O)	Comments
NISS17-4	9/24/2021 15:47	-22.45	-22.92	In Compliance*
NISS17-4	9/24/2021 15:48	0.52	1.13	Adjusted Valve
NISS17-4	9/24/2021 15:50	4.25	4.26	Second Reading
NISS17-4	10/7/2021 10:58	4.53	-5.77	Adjusted Valve, In Compliance*
NISS17-4	10/18/2021 17:28	4.45	-19.82	Adjusted Valve, In Compliance*
NISS17-6	9/8/2021 15:32	38.63	38.63	Adjusted Valve
NISS17-6	9/10/2021 11:22	2.75	2.79	Adjusted Valve
NISS17-6	9/10/2021 11:25	2.8	2.83	Second Reading
NISS17-6	9/20/2021 13:26	2.8	2.79	Adjusted Valve
NISS17-6	9/20/2021 13:27	2.79	2.78	Second Reading
NISS17-6	9/24/2021 14:53	3.25	3.25	Adjusted Valve
NISS17-6	9/24/2021 14:57	3.19	3.19	Second Reading
NISS17-6	10/4/2021 16:28	2.77	2.68	Adjusted Valve
NISS17-6	10/4/2021 16:29	2.06	2.06	Second Reading
NISS17-6	10/21/2021 13:46	-0.02	-0.06	In Compliance**
NLCR1112	11/11/2021 14:24	3.65	-1.06	Adjusted Valve, In Compliance*
NLCRST05	11/1/2021 16:37	5.18	-7.11	Adjusted Valve, In Compliance*
NLCRST05	1/21/2022 13:24	21.54	-1.36	Adjusted Valve, In Compliance*
NLCRST3A	11/11/2021 14:20	2.09	-0.01	Adjusted Valve, In Compliance*
NLCRST3B	11/11/2021 14:16	2.96	-0.09	Adjusted Valve, In Compliance*

Note: All required corrective action and remonitoring was completed in accordance with Rule 8-34 and NSPS timelines.

*Wells corrected within 15-days

**Wells not corrected within 15 days, but within 60 days for which root cause analyses were conducted.

**Table 4. Wells with Oxygen Exceedances
Newby Island Landfill, Milpitas, California
(August 1, 2021 through January 31, 2022)**

Well ID	Date and Time	Oxygen (%)	Comments
NI3EW40R	8/5/2021 11:41	4.9	(Initial Exceedance was on 7/23) Adjusted Reading, In Compliance
NI3EW40R	8/9/2021 13:46	19.8	Adjusted Valve
NI3EW40R	8/9/2021 13:49	19.4	Second Reading
NI3EW40R	8/19/2021 12:03	9.3	Adjusted Valve
NI3EW40R	8/19/2021 12:05	9.2	Second Reading
NI3EW40R	9/14/2021 12:53	11.8	Adjusted Valve
NI3EW40R	9/14/2021 12:54	11.5	Second Reading
NI3EW40R	9/20/2021 17:29	18.6	Adjusted Valve
NI3EW40R	9/20/2021 17:31	18.5	Second Reading
NI3EW40R	10/7/2021 14:37	16.2	Adjusted Valve
NI3EW40R	10/7/2021 14:44	16.7	Second Reading
NI3EW40R	10/26/2021 15:18	20.7	Adjusted Valve
NI3EW40R	11/8/2021 17:02	20.3	Adjusted Valve
NI3EW40R	11/19/2021 8:34	15.1	Adjusted Valve
NI3EW40R	11/19/2021 8:35	14.4	Second Reading (Well Permanently Decommissioned Due to Poor Gas Quality)
NIBC-17A	1/8/2022 14:29	14.1	Adjusted Valve
NIBC-17A	1/8/2022 14:32	12.3	Second Reading
NIBC-17A	1/17/2022 14:58	0	In Compliance
NIHC17-1	8/28/2021 9:41	18.7	Adjusted Valve
NIHC17-1	9/2/2021 10:27	7	Second Reading
NIHC17-1	9/8/2021 8:21	3.8	In Compliance
NIHC17-1	9/13/2021 16:42	18.8	Adjusted Valve
NIHC17-1	9/13/2021 16:44	18.9	Second Reading
NIHC17-1	9/14/2021 18:17	20.6	Adjusted Valve
NIHC17-1	9/14/2021 18:28	20.3	Second Reading
NIHC17-1	9/15/2021 12:28	16.1	Adjusted Valve
NIHC17-1	9/15/2021 12:30	15.6	Second Reading
NIHC17-1	9/16/2021 15:25	2	In Compliance
NIHC17-1	10/11/2021 8:47	6.5	Adjusted Valve
NIHC17-1	10/11/2021 8:49	8	Second Reading
NIHC17-1	10/29/2021 19:11	8.9	Adjusted Valve
NIHC17-1	10/29/2021 19:15	8.3	Second Reading
NIHC17-1	11/8/2021 17:14	10.1	Adjusted Valve
NIHC17-1	11/8/2021 17:18	11.4	Well Permanently Decommissioned Due to Poor Gas Quality
NIHC17-2	9/14/2021 17:36	13.5	Adjusted Valve

**Table 4. Wells with Oxygen Exceedances
Newby Island Landfill, Milpitas, California
(August 1, 2021 through January 31, 2022)**

Well ID	Date and Time	Oxygen (%)	Comments
NIHC17-2	9/14/2021 17:38	13.2	Second Reading
NIHC17-2	9/15/2021 11:40	14.3	Adjusted Valve
NIHC17-2	9/16/2021 14:35	16.9	Adjusted Valve
NIHC17-2	9/17/2021 13:10	17	Adjusted Valve
NIHC17-2	9/20/2021 12:35	19.7	Adjusted Valve
NIHC17-2	10/7/2021 15:20	6	Adjusted Valve
NIHC17-2	10/7/2021 15:22	6	Second Reading
NIHC17-2	10/18/2021 17:42	16.8	Adjusted Valve
NIHC17-2	10/18/2021 17:44	16.2	Second Reading
NIHC17-2	11/8/2021 17:29	13.9	Adjusted Valve
NIHC17-2	11/8/2021 17:30	14	Well Permanently Decommissioned Due to Poor Gas Quality
NIHC17-3	8/9/2021 14:34	11.4	Adjusted Valve
NIHC17-3	8/19/2021 11:19	6.1	Second Reading
NIHC17-3	8/19/2021 11:20	7	Adjusted Valve
NIHC17-3	8/27/2021 11:00	0	In Compliance
NIHC17-3	10/7/2021 15:25	6.4	Adjusted Valve
NIHC17-3	10/7/2021 15:27	6.8	Second Reading
NIHC17-3	10/18/2021 17:39	3.6	In Compliance
NIHC17-3	11/8/2021 17:25	15.6	Adjusted Valve
NIHC17-3	11/8/2021 17:26	15	Well Permanently Decommissioned Due to Poor Gas Quality
NIHC17-4	8/19/2021 11:11	8.4	Adjusted Valve
NIHC17-4	8/19/2021 11:13	7.9	Second Reading
NIHC17-4	8/19/2021 12:04	0	In Compliance
NIHC17-4	9/8/2021 15:02	14	Adjusted Valve
NIHC17-4	9/17/2021 15:36	0	In Compliance
NIHC17-5	8/13/2021 10:00	20.1	Adjusted Valve
NIHC17-5	8/13/2021 10:02	20.2	Second Reading
NIHC17-5	8/19/2021 11:26	20.2	Adjusted Valve
NIHC17-5	8/19/2021 11:27	20.1	Second Reading
NIHC17-5	8/27/2021 11:11	10.4	Adjusted Valve
NIHC17-5	8/27/2021 11:13	10.7	Second Reading
NIHC17-5	8/28/2021 9:22	17.6	Adjusted Valve
NIHC17-5	9/8/2021 14:58	16.3	Adjusted Valve
NIHC17-5	9/8/2021 14:58	16.3	Second Reading
NIHC17-5	9/10/2021 15:45	13.2	Adjusted Valve
NIHC17-5	9/10/2021 15:53	10.9	Second Reading

**Table 4. Wells with Oxygen Exceedances
Newby Island Landfill, Milpitas, California
(August 1, 2021 through January 31, 2022)**

Well ID	Date and Time	Oxygen (%)	Comments
NIHC17-5	9/13/2021 16:17	8.6	Adjusted Valve
NIHC17-5	9/13/2021 16:19	8.6	Second Reading
NIHC17-5	9/14/2021 17:54	18.6	Adjusted Valve
NIHC17-5	9/14/2021 17:59	18.2	Second Reading
NIHC17-5	9/15/2021 11:43	9.7	Adjusted Valve
NIHC17-5	9/15/2021 11:45	9.3	Second Reading
NIHC17-5	9/16/2021 14:40	10	Adjusted Valve
NIHC17-5	9/17/2021 13:32	14.5	Adjusted Valve
NIHC17-5	10/7/2021 15:14	14.6	Adjusted Valve
NIHC17-5	10/7/2021 15:15	14.5	Second Reading
NIHC17-5	10/26/2021 14:40	18.9	Adjusted Valve
NIHC17-5	11/8/2021 17:21	19.5	Well Permanently Decommissioned Due to Poor Gas Quality
NIHC17-6	9/8/2021 15:08	10.1	Adjusted Valve
NIHC17-6	9/10/2021 11:11	0.5	In Compliance
NIHC17-6	9/17/2021 16:00	14.3	Adjusted Valve
NIHC17-6	9/17/2021 16:02	10.7	Second Reading
NIHC17-6	9/29/2021 15:17	0.3	In Compliance
NIHC17-6	10/29/2021 18:48	13.1	Adjusted Valve
NIHC17-6	10/29/2021 18:50	2.1	In Compliance
NIHC17-7	8/13/2021 9:42	16	Adjusted Valve
NIHC17-7	8/13/2021 9:44	15.8	Second Reading
NIHC17-7	8/19/2021 11:07	3.9	In Compliance
NIHC17-7	9/8/2021 15:26	13.7	Adjusted Valve
NIHC17-7	9/10/2021 11:33	1	In Compliance
NIHC227A	1/21/2022 13:07	18.7	Adjusted Valve
NIHC227A	1/21/2022 13:11	17.9	Second Reading; Well remains in exceedance and compliance will be documented in the next report.
NIL3EW31	9/17/2021 15:04	11.8	Adjusted Valve
NIL3EW31	9/20/2021 15:22	0	In Compliance
NILCW001	8/13/2021 8:25	5.6	Adjusted Valve
NILCW001	8/13/2021 8:27	4.3	In Compliance
NILCW002	8/13/2021 8:33	8.5	Adjusted Valve
NILCW002	8/13/2021 8:38	8.3	Second Reading

**Table 4. Wells with Oxygen Exceedances
Newby Island Landfill, Milpitas, California
(August 1, 2021 through January 31, 2022)**

Well ID	Date and Time	Oxygen (%)	Comments
NILCW002	8/19/2021 12:41	6.1	Adjusted Valve
NILCW002	8/19/2021 12:41	6.1	Second Reading
NILCW002	8/19/2021 12:41	6.1	Third Reading
NILCW002	8/19/2021 12:41	6	Fourth Reading
NILCW002	8/19/2021 12:41	6	Fifth Reading
NILCW002	8/19/2021 12:41	6	Sixth Reading
NILCW002	8/19/2021 16:56	5.8	Seventh Reading
NILCW002	8/19/2021 16:58	6	Eighth Reading
NILCW002	8/20/2021 10:47	3.4	In Compliance
NILCW004	8/13/2021 8:53	5.2	Adjusted Valve
NILCW004	8/13/2021 8:54	5.3	Second Reading
NILCW004	8/19/2021 12:34	0.6	In Compliance
NILCW004	8/20/2021 11:19	5.7	Adjusted Valve
NILCW004	8/20/2021 11:25	5.3	Second Reading
NILCW004	8/26/2021 16:56	5.4	Adjusted Valve
NILCW004	8/26/2021 16:57	5.4	Second Reading
NILCW004	8/28/2021 11:10	0	In Compliance
NILCW004	1/17/2022 14:36	10.3	Adjusted Valve
NILCW004	1/17/2022 14:39	10.2	Second Reading
NILCW004	1/25/2022 17:43	3.1	In Compliance
NILEW035	10/12/2021 14:10	6	Adjusted Valve
NILEW035	10/12/2021 14:11	6	Second Reading
NILEW035	10/19/2021 10:19	8.3	Adjusted Valve
NILEW035	10/19/2021 10:21	8.3	Second Reading
NILEW035	11/2/2021 13:03	6.9	Adjusted Valve
NILEW035	11/16/2021 14:41	9.4	Adjusted Valve
NILEW035	11/16/2021 14:44	2.3	In Compliance
NILEW035	1/21/2022 11:18	6.9	Adjusted Valve
NILEW035	1/21/2022 11:22	6.8	Second Reading; Well remains in exceedance and compliance will be documented in the next report.
NILEW217	8/2/2021 17:43	9.1	(Initial Exceedance was on 7/21) Adjusted Valve
NILEW217	8/2/2021 17:45	9.2	Second Reading
NILEW217	8/5/2021 10:59	16.3	Adjusted Valve
NILEW217	8/20/2021 14:52	15.5	Adjusted Valve
NILEW217	8/20/2021 14:55	18.8	Second Reading
NILEW217	9/3/2021 11:15	9.7	Adjusted Valve
NILEW217	9/3/2021 11:17	9.5	Second Reading

**Table 4. Wells with Oxygen Exceedances
Newby Island Landfill, Milpitas, California
(August 1, 2021 through January 31, 2022)**

Well ID	Date and Time	Oxygen (%)	Comments
NILEW217	9/29/2021 11:39	3.6	In Compliance
NILEW228	12/9/2021 11:31	11.2	Adjusted Valve
NILEW228	12/9/2021 11:33	16.2	Second Reading
NILEW228	12/21/2021 16:07	6.8	Adjusted Valve
NILEW228	1/14/2022 14:04	10.6	Adjusted Valve
NILEW228	1/17/2022 11:59	8.5	Adjusted Valve; Well remains in exceedance and compliance will be documented in the next report.
NILEW431	8/6/2021 8:06	5.8	(Initial Exceedance was on 7/26) Adjusted Valve
NILEW431	8/6/2021 8:08	7.1	Second Reading
NILEW431	8/17/2021 9:17	5.5	Adjusted Valve
NILEW431	8/17/2021 9:19	5.4	Second Reading
NILEW431	9/3/2021 9:50	4.7	In Compliance
NILEW463	8/10/2021 10:42	19.9	(Initial Exceedance was on 7/30) Adjusted Valve
NILEW463	8/10/2021 10:43	20.4	Second Reading
NILEW463	9/10/2021 9:27	0	In Compliance
NILEW491	10/26/2021 16:34	8.7	Adjusted Valve
NILEW491	10/26/2021 16:35	8.7	Second Reading
NILEW491	11/5/2021 12:49	14	Adjusted Valve
NILEW491	11/17/2021 15:06	16	Adjusted Valve
NILEW491	11/18/2021 11:54	7.6	Adjusted Valve
NILEW491	11/18/2021 11:57	9.5	Second Reading
NILEW491	12/6/2021 16:38	9.2	Adjusted Valve
NILEW491	12/27/2021 15:33	14.7	Adjusted Valve
NILEW491	1/14/2022 10:40	12.6	Adjusted Valve
NILEW491	1/27/2022 15:29	8.2	Adjusted Valve
NILEW491	1/27/2022 15:45	9.4	Second Reading; Well remains in exceedance and compliance will be documented in the next report.
NILEW500	9/29/2021 12:16	7.6	Adjusted Valve
NILEW500	9/29/2021 12:18	7.7	Second Reading
NILEW500	10/13/2021 15:27	2.6	In Compliance
NILEW514	8/6/2021 9:07	2	(Initial Exceedance was on 7/27) Adjusted Valve
NILEW604	8/6/2021 12:21	7.6	Adjusted Valve
NILEW604	8/6/2021 12:23	13.3	Second Reading
NILEW604	8/16/2021 12:21	7.9	Adjusted Valve
NILEW604	8/16/2021 12:23	8.1	Second Reading

**Table 4. Wells with Oxygen Exceedances
Newby Island Landfill, Milpitas, California
(August 1, 2021 through January 31, 2022)**

Well ID	Date and Time	Oxygen (%)	Comments
NILEW604	8/18/2021 14:05	10	Adjusted Valve
NILEW604	8/18/2021 14:07	11.3	Second Reading
NILEW604	9/13/2021 9:34	0.5	In Compliance
NILEW604	11/17/2021 14:56	10.5	Adjusted Valve
NILEW604	11/17/2021 15:01	12	Second Reading
NILEW604	12/2/2021 15:53	11.8	Adjusted Valve
NILEW604	12/27/2021 15:27	16.8	Adjusted Valve
NILEW604	1/14/2022 13:49	15.2	Adjusted Valve
NILEW604	1/24/2022 15:11	15.4	Adjusted Valve
NILEW604	1/24/2022 15:21	15.5	Second Reading; Well remains in exceedance and compliance will be documented in the next report.
NILEW612	8/24/2021 14:27	19.3	Adjusted Valve
NILEW612	8/24/2021 14:30	19.4	Second Reading
NILEW612	9/8/2021 9:32	0.2	In Compliance
NILEW620	9/13/2021 9:55	10.9	Adjusted Valve
NILEW620	9/13/2021 9:56	1.8	In Compliance
NILEW620	1/28/2022 12:25	17.1	Adjusted Valve
NILEW620	1/28/2022 12:27	17.2	Second Reading; Well remains in exceedance and compliance will be documented in the next report.
NILEW644	9/7/2021 13:55	15.2	Adjusted Valve
NILEW644	9/7/2021 13:58	4.4	In Compliance
NILEW644	11/1/2021 18:18	5.9	Adjusted Valve
NILEW644	11/1/2021 18:19	2	In Compliance
NILEW644	11/18/2021 9:53	12.3	Adjusted Valve
NILEW644	11/18/2021 9:56	10	Second Reading
NILEW644	12/2/2021 12:23	0	In Compliance
NILEW648	8/16/2021 14:21	7.7	Adjusted Valve
NILEW648	8/16/2021 14:23	7.6	Second Reading
NILEW648	8/30/2021 14:00	4.8	In Compliance
NILEW648	10/25/2021 17:35	5.7	Adjusted Valve
NILEW648	10/25/2021 17:36	4.9	In Compliance
NILEW648	11/3/2021 17:48	8.3	Adjusted Valve

**Table 4. Wells with Oxygen Exceedances
Newby Island Landfill, Milpitas, California
(August 1, 2021 through January 31, 2022)**

Well ID	Date and Time	Oxygen (%)	Comments
NILEW648	11/3/2021 17:50	5.2	Second Reading
NILEW648	11/17/2021 14:51	2.7	In Compliance
NILEW648	12/6/2021 17:36	9.4	Adjusted Valve
NILEW648	12/6/2021 17:38	9	Second Reading
NILEW648	12/21/2021 15:51	4.9	In Compliance
NILEW650	11/5/2021 13:01	5.8	Adjusted Valve
NILEW650	11/5/2021 13:03	5.7	Second Reading
NILEW650	11/17/2021 15:03	0	In Compliance
NILEW653	9/13/2021 10:02	7.7	Adjusted Valve
NILEW653	9/13/2021 10:05	12.9	Second Reading
NILEW653	9/20/2021 14:14	0	In Compliance
NILEW653	10/5/2021 15:31	6.7	Adjusted Valve
NILEW653	10/6/2021 13:05	1.6	In Compliance
NILEW653	11/8/2021 16:20	12	Adjusted Valve
NILEW653	11/8/2021 16:23	10.4	Second Reading
NILEW653	11/18/2021 12:51	0	In Compliance
NILEW654	9/13/2021 9:04	15.1	Adjusted Valve
NILEW654	9/13/2021 9:06	15.4	Second Reading
NILEW654	9/28/2021 11:24	0.9	In Compliance
NILEW654	11/5/2021 13:36	13.1	Adjusted Valve
NILEW654	11/5/2021 14:09	20.8	Second Reading
NILEW654	11/17/2021 15:10	20.8	Adjusted Valve
NILEW654	11/17/2021 15:14	20.8	Second Reading
NILEW654	12/2/2021 19:01	0.1	In Compliance
NILEW655	8/10/2021 16:14	20.3	Adjusted Valve
NILEW655	8/10/2021 16:16	20.5	Second Reading
NILEW655	8/16/2021 13:10	0	In Compliance
NILEW656	8/13/2021 13:15	20.3	Adjusted Valve
NILEW656	8/13/2021 13:17	16.3	Second Reading
NILEW656	8/19/2021 12:56	14.7	Adjusted Valve
NILEW656	8/19/2021 12:58	14.7	Second Reading
NILEW656	9/14/2021 11:38	15.2	Adjusted Valve
NILEW656	9/14/2021 11:40	15.5	Second Reading
NILEW656	9/20/2021 17:05	15	Adjusted Valve

**Table 4. Wells with Oxygen Exceedances
Newby Island Landfill, Milpitas, California
(August 1, 2021 through January 31, 2022)**

Well ID	Date and Time	Oxygen (%)	Comments
NILEW656	9/20/2021 17:06	15.6	Well Permanently Decommissioned Due to Poor Gas Quality
NILEW659	8/26/2021 10:17	20	Adjusted Valve
NILEW659	8/26/2021 10:19	20.2	Second Reading
NILEW659	9/8/2021 8:40	0.2	In Compliance
NILEW659	11/19/2021 8:24	10	Adjusted Valve
NILEW659	11/19/2021 8:25	10.5	Second Reading
NILEW659	12/2/2021 16:18	4.1	In Compliance
NILEW661	9/15/2021 14:09	10.2	Adjusted Valve
NILEW661	9/15/2021 14:12	16.9	Second Reading
NILEW661	9/20/2021 18:02	13.8	Adjusted Valve
NILEW661	9/20/2021 18:05	11.9	Second Reading
NILEW661	9/29/2021 15:13	4.1	In Compliance
NILEW668	8/9/2021 15:09	10.5	Adjusted Valve
NILEW668	8/13/2021 13:16	11.5	Adjusted Valve
NILEW668	8/13/2021 13:18	9.2	Second Reading
NILEW668	8/13/2021 13:18	9.2	Third Reading
NILEW668	8/19/2021 13:00	2.4	In Compliance
NILEW668	9/14/2021 11:34	18.3	Adjusted Valve
NILEW668	9/14/2021 11:36	18.5	Second Reading
NILEW668	9/20/2021 17:08	16.9	Adjusted Valve
NILEW668	9/20/2021 17:10	16.6	Second Reading
NILEW668	10/7/2021 15:50	4.7	In Compliance
NILEW668	11/11/2021 12:41	12.9	Adjusted Valve
NILEW668	11/11/2021 12:43	15.6	Second Reading
NILEW668	11/24/2021 11:12	10.5	Adjusted Valve
NILEW668	12/10/2021 15:03	10	Adjusted Valve
NILEW668	1/13/2022 12:11	9.1	Adjusted Valve
NILEW668	1/31/2022 9:47	8.5	Adjusted Valve
NILEW668	1/31/2022 10:31	8.1	Second Reading; Well remains in exceedance and compliance will be documented in the next report.
NILEW669	8/17/2021 11:23	6.6	Adjusted Valve
NILEW669	8/17/2021 11:28	6.5	Second Reading
NILEW669	9/1/2021 10:33	0	In Compliance
NILEW672	8/17/2021 9:53	8	Adjusted Valve

**Table 4. Wells with Oxygen Exceedances
Newby Island Landfill, Milpitas, California
(August 1, 2021 through January 31, 2022)**

Well ID	Date and Time	Oxygen (%)	Comments
NILEW672	8/17/2021 9:56	9.8	Second Reading
NILEW672	9/1/2021 11:02	0.5	In Compliance
NILEW672	10/14/2021 11:10	10.9	Adjusted Valve
NILEW672	10/14/2021 11:12	11.2	Second Reading
NILEW672	10/21/2021 14:42	1.9	In Compliance
NILEW672	11/11/2021 10:43	7.6	Adjusted Valve
NILEW672	11/11/2021 10:52	13	Second Reading
NILEW672	11/18/2021 9:53	19.9	Adjusted Valve
NILEW672	11/18/2021 9:54	20.9	Second Reading
NILEW672	12/13/2021 12:29	18	Adjusted Valve
NILEW672	12/23/2021 8:21	15.9	Adjusted Valve
NILEW672	12/23/2021 8:22	17	Second Reading
NILEW672	1/3/2022 14:19	15.2	Adjusted Valve
NILEW672	1/21/2022 15:26	12.9	Adjusted Valve; Well remains in exceedance and compliance will be documented in the next report.
NILEW677	8/6/2021 11:00	12.7	(Initial Exceedance was on 5/19) Adjusted Valve
NILEW677	8/6/2021 11:02	10.3	Second Reading
NILEW677	8/16/2021 13:13	7.5	Adjusted Valve
NILEW677	8/16/2021 13:16	7.3	Second Reading
NILEW677	9/10/2021 14:38	3.3	In Compliance
NILEW677	10/5/2021 15:50	10.7	Adjusted Valve
NILEW677	10/5/2021 16:13	10	Second Reading
NILEW677	10/20/2021 16:02	19.9	Adjusted Valve
NILEW677	10/20/2021 16:07	19.7	Second Reading
NILEW677	10/26/2021 15:46	0.1	In Compliance
NILEW677	11/8/2021 15:43	14.6	Adjusted Valve
NILEW677	11/8/2021 15:48	14.3	Second Reading
NILEW677	11/18/2021 12:33	15.5	Adjusted Valve
NILEW677	11/18/2021 12:34	8.8	Second Reading
NILEW677	12/2/2021 18:21	9	Adjusted Valve
NILEW677	12/2/2021 18:23	8.7	Second Reading
NILEW677	12/27/2021 16:26	2.1	In Compliance
NILEW677	1/13/2022 16:43	14.5	Adjusted Valve
NILEW677	1/13/2022 16:49	14.3	Second Reading
NILEW677	1/28/2022 12:51	13.9	Adjusted Valve; Well remains in exceedance and compliance will be documented in the next report.

**Table 4. Wells with Oxygen Exceedances
Newby Island Landfill, Milpitas, California
(August 1, 2021 through January 31, 2022)**

Well ID	Date and Time	Oxygen (%)	Comments
NILEW679	9/13/2021 10:50	18.9	Adjusted Valve
NILEW679	9/13/2021 10:52	19.7	Second Reading
NILEW679	9/21/2021 16:54	0	In Compliance
NILEW682	12/27/2021 10:31	5.4	Adjusted Valve
NILEW682	12/27/2021 10:33	5.3	Second Reading
NILEW682	1/10/2022 15:08	3.6	In Compliance
NILEW683	8/6/2021 10:58	9.4	Adjusted Valve
NILEW683	8/6/2021 10:59	15.8	Second Reading
NILEW683	8/16/2021 12:36	3	In Compliance
NILEW683	9/13/2021 8:56	19.9	Adjusted Valve
NILEW683	9/13/2021 8:58	19.9	Second Reading
NILEW683	9/28/2021 11:10	4.2	In Compliance
NILEW683	12/27/2021 16:09	17.4	Adjusted Valve
NILEW683	12/27/2021 16:10	17	Second Reading
NILEW683	1/10/2022 15:14	15.5	Adjusted Valve
NILEW683	1/27/2022 18:37	0.9	In Compliance
NILEW684	1/24/2022 17:58	8.4	Adjusted Valve
NILEW684	1/24/2022 18:09	9.6	Second Reading; Well remains in exceedance and compliance will be documented in the next report.
NILEW685	8/10/2021 16:48	19.1	(Initial Exceedance was on 7/30) Adjusted Valve
NILEW685	8/10/2021 16:50	20	Second Reading
NILEW685	8/26/2021 9:52	20	Adjusted Valve
NILEW685	8/26/2021 9:54	20.2	Second Reading
NILEW685	9/14/2021 10:45	19.7	Adjusted Valve
NILEW685	9/14/2021 10:50	19.6	Second Reading
NILEW685	9/22/2021 10:26	19.5	Adjusted Valve
NILEW685	9/22/2021 10:32	19.3	Well Permanently Decommissioned Due to Poor Gas Quality
NILEW687	8/10/2021 16:36	19.3	Adjusted Valve
NILEW687	8/10/2021 16:39	0.6	In Compliance
NILEW687	8/26/2021 10:42	20.2	Adjusted Valve
NILEW687	8/26/2021 10:44	20	Second Reading
NILEW687	9/2/2021 10:54	4.5	In Compliance

**Table 4. Wells with Oxygen Exceedances
Newby Island Landfill, Milpitas, California
(August 1, 2021 through January 31, 2022)**

Well ID	Date and Time	Oxygen (%)	Comments
NILEW687	10/26/2021 14:53	8.8	Adjusted Valve
NILEW687	10/26/2021 14:56	12.7	Second Reading
NILEW687	11/10/2021 12:31	10.4	Adjusted Valve
NILEW687	11/19/2021 8:27	3.1	In Compliance
NILEW687	12/2/2021 16:21	7.1	Adjusted Valve
NILEW687	12/2/2021 16:23	7.4	Second Reading
NILEW687	12/17/2021 14:31	2.4	In Compliance
NILEW693	10/26/2021 14:31	11.9	Adjusted Valve
NILEW693	10/26/2021 14:33	11	Second Reading
NILEW693	11/3/2021 15:17	0	In Compliance
NILEW694	8/19/2021 12:48	7.2	Adjusted Valve
NILEW694	8/19/2021 12:51	7.1	Second Reading
NILEW694	9/1/2021 9:23	4.7	In Compliance
NILEW695	8/9/2021 14:59	10	Adjusted Valve
NILEW695	8/9/2021 15:01	12.4	Second Reading
NILEW695	8/19/2021 13:05	15.8	Adjusted Valve
NILEW695	8/19/2021 13:29	17.9	Second Reading
NILEW695	9/15/2021 13:39	17.5	Adjusted Valve
NILEW695	9/15/2021 13:45	16.9	Second Reading
NILEW695	9/20/2021 17:03	2	In Compliance
NILEW695	12/13/2021 15:52	5.8	Adjusted Valve
NILEW695	12/13/2021 15:54	5.9	Second Reading
NILEW695	12/17/2021 14:41	8.6	Adjusted Valve
NILEW695	12/27/2021 12:20	6.2	Second Reading
NILEW695	1/13/2022 16:33	12	Adjusted Valve
NILEW695	1/28/2022 12:29	10.1	Adjusted Valve; Well remains in exceedance and compliance will be documented in the next report.
NILEW697	8/9/2021 14:51	8.9	Adjusted Valve
NILEW697	8/13/2021 13:26	11.9	Adjusted Valve
NILEW697	8/13/2021 13:28	11.8	Second Reading
NILEW697	8/19/2021 10:59	5.4	Adjusted Valve
NILEW697	8/19/2021 11:02	6	Second Reading
NILEW697	9/15/2021 13:32	20.1	Adjusted Valve
NILEW697	9/15/2021 13:34	20.2	Second Reading
NILEW697	9/17/2021 14:19	20.1	Adjusted Valve
NILEW697	9/17/2021 14:22	20.3	Well Permanently Decommissioned Due to Poor Gas Quality

**Table 4. Wells with Oxygen Exceedances
Newby Island Landfill, Milpitas, California
(August 1, 2021 through January 31, 2022)**

Well ID	Date and Time	Oxygen (%)	Comments
NILEW698	8/10/2021 16:24	20.7	(Initial Exceedance was on 6/29) Adjusted Valve
NILEW698	8/10/2021 16:25	20.5	Second Reading
NILEW698	8/26/2021 10:29	20.4	Adjusted Valve
NILEW698	8/26/2021 10:30	20.3	Second Reading
NILEW698	9/14/2021 11:20	20.4	Adjusted Valve
NILEW698	9/14/2021 11:22	20.6	Second Reading
NILEW698	9/22/2021 10:46	20.9	Adjusted Valve
NILEW698	9/22/2021 10:48	20.6	Well Permanently Decommissioned Due to Poor Gas Quality
NILEW704	8/5/2021 11:19	7.9	(Initial Exceedance was on 7/21) Adjusted Valve
NILEW704	8/9/2021 9:58	7	Adjusted Valve
NILEW704	8/9/2021 10:00	7.2	Second Reading
NILEW704	8/19/2021 13:23	4.8	In Compliance
NILEW704	10/12/2021 13:55	5.6	Adjusted Valve
NILEW704	10/12/2021 13:57	5.6	Second Reading
NILEW704	10/19/2021 12:02	7.9	Adjusted Valve
NILEW704	10/19/2021 12:04	8	Second Reading
NILEW704	11/2/2021 12:57	9.9	Adjusted Valve
NILEW704	11/2/2021 13:00	10.9	Second Reading
NILEW704	11/16/2021 14:22	7	Adjusted Valve
NILEW704	12/1/2021 16:31	5.2	Adjusted Valve
NILEW704	12/1/2021 16:35	1.5	In Compliance
NILEW704	1/21/2022 11:22	18.5	Adjusted Valve
NILEW704	1/21/2022 11:28	18.3	Second Reading; Well remains in exceedance and compliance will be documented in the next report.
NILEW708	9/10/2021 9:52	19.5	Adjusted Valve
NILEW708	9/10/2021 9:55	18.9	Second Reading
NILEW708	9/20/2021 15:26	0.1	In Compliance
NILEW714	9/29/2021 11:32	8.7	Adjusted Valve
NILEW714	9/29/2021 11:34	6	Second Reading
NILEW714	10/13/2021 14:24	6	Adjusted Valve
NILEW714	10/13/2021 14:27	6.3	Second Reading
NILEW714	10/19/2021 15:16	6.6	Adjusted Valve
NILEW714	10/19/2021 15:19	6.1	Second Reading
NILEW714	11/12/2021 13:17	3	In Compliance
NILEW720	8/2/2021 16:49	9.2	(Initial Exceedance was on 7/20) Adjusted Valve

**Table 4. Wells with Oxygen Exceedances
Newby Island Landfill, Milpitas, California
(August 1, 2021 through January 31, 2022)**

Well ID	Date and Time	Oxygen (%)	Comments
NILEW720	8/2/2021 16:51	8.4	Second Reading
NILEW720	8/6/2021 11:12	6.8	Adjusted Valve
NILEW720	8/6/2021 11:14	6.6	Second Reading
NILEW720	8/16/2021 13:22	0	In Compliance
NILEW723	8/6/2021 11:29	21	(Initial Exceedance was on 7/7) Adjusted Valve
NILEW723	8/6/2021 11:30	21	Second Reading
NILEW723	8/16/2021 14:41	20.5	Adjusted Valve
NILEW723	8/16/2021 14:43	20.7	Second Reading
NILEW723	9/13/2021 9:15	18.5	Adjusted Valve
NILEW723	9/13/2021 9:18	18.4	Second Reading
NILEW723	9/27/2021 11:22	19.4	Adjusted Valve
NILEW723	9/27/2021 11:23	19.3	Second Reading
NILEW723	10/6/2021 13:46	19.6	Adjusted Valve
NILEW723	10/6/2021 13:49	19	Second Reading
NILEW723	10/26/2021 16:29	20.3	Adjusted Valve
NILEW723	10/26/2021 16:31	20.4	Second Reading
NILEW723	10/28/2021 14:42	20.6	Adjusted Valve
NILEW723	10/28/2021 14:47	20.5	Second Reading
NILEW723	11/3/2021 18:15	0	In Compliance
NILEW723	12/2/2021 19:17	20.7	Adjusted Valve
NILEW723	12/2/2021 19:18	20.5	Second Reading
NILEW723	12/17/2021 14:21	21	Adjusted Valve
NILEW723	1/14/2022 11:02	19.6	Adjusted Valve
NILEW723	1/27/2022 15:56	19.7	Adjusted Valve
NILEW723	1/27/2022 16:11	19.9	Second Reading; Well remains in exceedance and compliance will be documented in the next report.
NILEW728	8/6/2021 9:22	7	Adjusted Valve
NILEW728	8/6/2021 9:25	4.5	In Compliance
NILEW728	9/3/2021 11:19	5.4	Adjusted Valve
NILEW728	9/3/2021 11:20	5.9	Second Reading
NILEW728	9/20/2021 12:55	15	Adjusted Valve
NILEW728	9/20/2021 13:03	14.9	Second Reading
NILEW728	10/14/2021 12:05	12.5	Adjusted Valve
NILEW728	10/14/2021 12:08	11.7	Second Reading
NILEW728	10/22/2021 9:18	8.4	Adjusted Valve
NILEW728	10/22/2021 9:26	8.9	Second Reading
NILEW728	11/10/2021 14:16	19.7	Adjusted Valve
NILEW728	11/10/2021 14:21	15.9	Second Reading
NILEW728	11/19/2021 11:57	18.1	Adjusted Valve

**Table 4. Wells with Oxygen Exceedances
Newby Island Landfill, Milpitas, California
(August 1, 2021 through January 31, 2022)**

Well ID	Date and Time	Oxygen (%)	Comments
NILEW728	11/19/2021 11:58	18.3	Second Reading
NILEW728	12/6/2021 15:41	12	Adjusted Valve
NILEW728	12/21/2021 15:37	14.3	Well Permanently Decommissioned Due to Poor Gas Quality
NILEW735	8/9/2021 13:34	5.8	Adjusted Valve
NILEW735	8/9/2021 13:37	5.6	Second Reading
NILEW735	8/18/2021 13:03	7.9	Adjusted Valve
NILEW735	8/18/2021 13:05	16.5	Second Reading
NILEW735	8/19/2021 13:40	9.6	Adjusted Valve
NILEW735	8/19/2021 13:42	11.1	Second Reading
NILEW735	9/9/2021 14:42	12.7	Adjusted Valve
NILEW735	9/9/2021 14:44	12.7	Second Reading
NILEW735	9/22/2021 15:59	17.2	Adjusted Valve
NILEW735	9/22/2021 16:01	16.2	Second Reading
NILEW735	10/6/2021 10:00	2.4	In Compliance
NILEW739	8/6/2021 10:49	15.1	Adjusted Valve
NILEW739	8/6/2021 10:50	15	Second Reading
NILEW739	8/16/2021 14:58	11.5	Adjusted Valve
NILEW739	8/16/2021 15:01	11.9	Second Reading
NILEW739	9/10/2021 14:28	2.3	In Compliance
NILEW740	1/31/2022 10:36	7.5	Adjusted Valve
NILEW740	1/31/2022 10:41	2.8	In Compliance
NILEW745	9/14/2021 15:15	6.4	Adjusted Valve
NILEW745	9/14/2021 15:16	6.4	Second Reading
NILEW745	9/16/2021 16:58	0	In Compliance
NILEW747	8/5/2021 10:40	7.2	(Initial Exceedance was on 7/21) Adjusted Valve
NILEW747	8/13/2021 14:43	8.1	Adjusted Valve
NILEW747	8/13/2021 14:44	8	Second Reading
NILEW747	8/20/2021 14:19	8.8	Adjusted Valve
NILEW747	8/20/2021 14:24	9.1	Second Reading
NILEW747	9/3/2021 11:34	11.6	Adjusted Valve
NILEW747	9/3/2021 11:36	12.3	Second Reading
NILEW747	9/29/2021 12:31	0	In Compliance
NILEW748	8/6/2021 13:13	0	(Initial Exceedance was on 7/29) In Compliance
NILEW748	10/11/2021 10:19	8.7	Adjusted Valve
NILEW748	10/11/2021 10:21	8	Second Reading
NILEW748	10/22/2021 11:24	0	In Compliance

**Table 4. Wells with Oxygen Exceedances
Newby Island Landfill, Milpitas, California
(August 1, 2021 through January 31, 2022)**

Well ID	Date and Time	Oxygen (%)	Comments
NILEW749	8/10/2021 10:26	18.8	Adjusted Valve
NILEW749	8/10/2021 11:11	17.5	Second Reading
NILEW749	8/18/2021 13:38	0	In Compliance
NILEW749	10/22/2021 10:49	6.6	Adjusted Valve
NILEW749	10/22/2021 10:51	5.7	Second Reading
NILEW749	11/3/2021 14:38	0.8	In Compliance
NILEW750	10/11/2021 14:53	8.5	Adjusted Valve
NILEW750	10/11/2021 15:07	7.2	Second Reading
NILEW750	10/22/2021 10:57	6.2	Adjusted Valve
NILEW750	10/22/2021 11:07	2.2	In Compliance
NILEW753	8/5/2021 11:14	3.4	(Initial Exceedance was on 7/21) In Compliance
NILEW753	8/19/2021 14:04	7.3	Adjusted Valve
NILEW753	8/19/2021 14:12	9.2	Second Reading
NILEW753	9/1/2021 11:29	5.8	Adjusted Valve
NILEW753	9/1/2021 11:30	5.8	Second Reading
NILEW753	9/1/2021 11:33	5.8	Third Reading
NILEW753	9/29/2021 13:21	0.1	In Compliance
NILEW753	10/6/2021 10:55	10.6	Adjusted Valve
NILEW753	10/6/2021 10:57	10.8	Second Reading
NILEW753	10/19/2021 13:33	0	In Compliance
NILEW753	12/9/2021 14:26	5.5	Adjusted Valve
NILEW753	12/9/2021 14:29	5.5	Second Reading
NILEW753	12/21/2021 15:06	1.3	In Compliance
NILEW753	1/13/2022 13:32	6	Adjusted Valve
NILEW753	1/13/2022 13:35	5.4	Second Reading
NILEW753	1/17/2022 13:08	6	Adjusted Valve
NILEW753	1/17/2022 13:15	5.9	Second Reading
NILEW753	1/28/2022 15:16	0.7	In Compliance
NILEW760	8/2/2021 16:42	0.3	(Initial Exceedance was on 7/20) In Compliance
NILEW760	8/6/2021 10:40	7	Adjusted Valve
NILEW760	8/6/2021 10:43	4.7	In Compliance
NILEW761	8/9/2021 16:30	9.5	Adjusted Valve
NILEW761	8/9/2021 16:32	10.3	Second Reading

**Table 4. Wells with Oxygen Exceedances
Newby Island Landfill, Milpitas, California
(August 1, 2021 through January 31, 2022)**

Well ID	Date and Time	Oxygen (%)	Comments
NILEW761	8/16/2021 15:09	9.4	Adjusted Valve
NILEW761	8/16/2021 15:10	10.8	Second Reading
NILEW761	9/7/2021 14:44	4.8	In Compliance
NILEW762	8/6/2021 10:35	9.2	Adjusted Valve
NILEW762	8/6/2021 10:36	9.2	Second Reading
NILEW762	8/16/2021 15:14	9.9	Adjusted Valve
NILEW762	8/16/2021 15:15	9.8	Second Reading
NILEW762	9/7/2021 14:37	4.5	In Compliance
NILEW763	9/3/2021 11:07	14.7	Adjusted Valve
NILEW763	9/3/2021 11:08	14.1	Second Reading
NILEW763	9/20/2021 13:10	6.9	Adjusted Valve
NILEW763	9/20/2021 13:13	1.5	In Compliance
NILEW763	10/14/2021 11:43	9	Adjusted Valve
NILEW763	10/14/2021 11:47	8.1	Second Reading
NILEW763	10/25/2021 11:31	1.1	In Compliance
NILEW763	11/10/2021 14:02	7.1	Adjusted Valve
NILEW763	11/10/2021 14:06	6.7	Second Reading
NILEW763	11/18/2021 12:06	3.4	In Compliance
NILEW763	12/6/2021 15:07	16.9	Adjusted Valve
NILEW763	12/6/2021 15:11	17.1	Second Reading
NILEW763	12/21/2021 15:22	19.6	Adjusted Valve
NILEW763	12/21/2021 15:25	19.1	Second Reading
NILEW763	1/14/2022 11:52	18.9	Adjusted Valve
NILEW763	1/28/2022 14:08	17.9	Adjusted Valve; Well remains in exceedance and compliance will be documented in the next report.
NILEW765	11/1/2021 18:03	5.6	Adjusted Valve
NILEW765	11/1/2021 18:07	0.1	In Compliance
NILEW767	10/21/2021 13:54	6.3	Adjusted Valve
NILEW767	10/21/2021 13:55	5.6	Second Reading
NILEW767	11/1/2021 17:07	0.1	In Compliance
NILEW767	12/6/2021 13:22	9.2	Adjusted Valve
NILEW767	12/6/2021 13:26	0	In Compliance
NILEW769	8/5/2021 10:50	20	(Initial Exceedance was on 7/21) Adjusted Valve
NILEW769	8/24/2021 10:20	19.5	Adjusted Valve

**Table 4. Wells with Oxygen Exceedances
Newby Island Landfill, Milpitas, California
(August 1, 2021 through January 31, 2022)**

Well ID	Date and Time	Oxygen (%)	Comments
NILEW769	8/24/2021 10:24	19.5	Second Reading
NILEW769	9/15/2021 13:51	2.6	In Compliance
NILEW769	12/30/2021 11:12	7.8	Adjusted Valve
NILEW769	12/30/2021 11:13	7.8	Second Reading
NILEW769	1/7/2022 13:43	8.6	Adjusted Valve
NILEW769	1/17/2022 12:16	8.9	Second Reading; Well remains in exceedance and compliance will be documented in the next report.
NILLEW16	8/10/2021 15:43	13.4	(Initial Exceedance was on 7/13)
NILLEW16	8/10/2021 15:45	11.9	Second Reading
NILLEW16	8/24/2021 8:39	9.6	Adjusted Valve
NILLEW16	8/24/2021 8:43	12	Second Reading
NILLEW16	9/9/2021 16:22	2.7	In Compliance
NILLEW16	9/29/2021 9:35	5.8	Adjusted Valve
NILLEW16	9/29/2021 9:38	7	Second Reading
NILLEW16	10/12/2021 14:36	16.8	Adjusted Valve
NILLEW16	10/12/2021 14:38	16.2	Second Reading
NILLEW16	10/19/2021 11:42	16.7	Adjusted Valve
NILLEW16	10/19/2021 11:45	19.2	Second Reading
NILLEW16	10/29/2021 16:53	2.3	In Compliance
NILMW002	8/10/2021 11:49	13.8	Adjusted Valve (Initial Exceedance was on 6/24)
NILMW002	8/10/2021 11:51	14	Second Reading
NILMW002	8/24/2021 13:36	6.6	Adjusted Valve
NILMW002	8/24/2021 13:39	6.3	Second Reading
NILMW002	9/13/2021 13:42	20.2	Adjusted Valve
NILMW002	9/13/2021 13:44	20.4	Second Reading
NILMW002	10/13/2021 11:28	18.6	Adjusted Valve
NILMW002	10/13/2021 11:30	18.8	Second Reading
NILMW002	10/21/2021 17:33	19.6	Adjusted Valve
NILMW002	10/22/2021 10:00	17.7	Well Permanently Decommissioned Due to Poor Gas Quality
NILMW003	9/13/2021 13:41	17.1	Adjusted Valve
NILMW003	9/13/2021 13:44	0.5	In Compliance
NILMW005	12/28/2021 16:15	12.3	Adjusted Valve
NILMW005	12/28/2021 16:18	12.9	Second Reading
NILMW005	1/10/2022 12:24	9.2	Adjusted Valve
NILMW005	1/10/2022 12:26	9.4	Second Reading

**Table 4. Wells with Oxygen Exceedances
Newby Island Landfill, Milpitas, California
(August 1, 2021 through January 31, 2022)**

Well ID	Date and Time	Oxygen (%)	Comments
NILMW005	1/20/2022 15:39	16	Adjusted Valve; Well remains in exceedance and compliance will be documented in the next report.
NILMW008	1/10/2022 12:38	20.2	Adjusted Valve
NILMW008	1/10/2022 12:43	20.5	Second Reading
NILMW008	1/20/2022 15:52	20.8	Adjusted Valve
NILMW008	1/26/2022 17:23	21.1	Adjusted Valve
NILMW008	1/26/2022 17:27	21.4	Second Reading; Well remains in exceedance and compliance will be documented in the next report.
NILMW011	12/28/2021 16:27	19.4	Adjusted Valve
NILMW011	12/28/2021 16:29	19.7	Second Reading
NILMW011	1/10/2022 12:51	18.9	Adjusted Valve
NILMW011	1/20/2022 15:55	16.7	Second Reading; Well remains in exceedance and compliance will be documented in the next report.
NILMW017	10/13/2021 12:35	18.2	Adjusted Valve
NILMW017	10/13/2021 12:42	20.4	Second Reading
NILMW017	10/26/2021 12:18	0	In Compliance
NILMW019	10/19/2021 14:32	6.3	Adjusted Valve
NILMW019	10/19/2021 14:34	6.8	Second Reading
NILMW019	11/3/2021 18:54	7.5	Adjusted Valve
NILMW019	11/12/2021 14:08	9.3	Adjusted Valve
NILMW019	11/12/2021 14:11	10	Second Reading
NILMW019	11/17/2021 12:48	10.7	Adjusted Valve
NILMW019	11/17/2021 12:50	4.7	In Compliance
NILMW019	12/13/2021 16:30	9.9	Adjusted Valve
NILMW019	12/13/2021 16:33	11.5	Second Reading
NILMW019	12/17/2021 11:20	0.2	In Compliance
NILMW019	1/13/2022 15:37	11.7	Adjusted Valve
NILMW019	1/14/2022 8:48	0.6	In Compliance
NILMW020	8/20/2021 15:51	7.9	Adjusted Valve
NILMW020	8/20/2021 15:53	7.8	Second Reading
NILMW020	9/2/2021 13:37	7.6	Adjusted Valve
NILMW020	9/2/2021 13:39	3.4	In Compliance
NILMW020	11/12/2021 14:47	5.3	Adjusted Valve

**Table 4. Wells with Oxygen Exceedances
Newby Island Landfill, Milpitas, California
(August 1, 2021 through January 31, 2022)**

Well ID	Date and Time	Oxygen (%)	Comments
NILMW020	11/12/2021 14:48	4.9	In Compliance
NILMW020	12/13/2021 17:29	5.7	Adjusted Valve
NILMW020	12/13/2021 17:54	5.4	Second Reading
NILMW020	12/17/2021 11:11	0	In Compliance
NILMW020	1/21/2022 9:32	6	Adjusted Valve
NILMW020	1/21/2022 9:36	6	Second Reading; Well remains in exceedance and compliance will be documented in the next report.
NILMW027	9/3/2021 9:29	10.5	Adjusted Valve
NILMW027	9/3/2021 9:31	9.8	Second Reading
NILMW027	9/20/2021 10:59	0.2	In Compliance
NILMW027	11/2/2021 13:07	12.6	Adjusted Valve
NILMW027	11/2/2021 13:11	13.1	Second Reading
NILMW027	11/16/2021 14:29	0	In Compliance
NILMW031	8/9/2021 11:37	6.6	Adjusted Valve
NILMW031	8/9/2021 11:39	6.6	Second Reading
NILMW031	8/18/2021 12:54	6.3	Adjusted Valve
NILMW031	8/18/2021 12:56	11	Second Reading
NILMW031	8/20/2021 10:32	0.2	In Compliance
NILMW031	10/19/2021 10:32	5.9	Adjusted Valve
NILMW031	10/19/2021 10:35	6	Second Reading
NILMW031	11/2/2021 13:20	4.9	In Compliance
NILMW031	12/1/2021 15:27	5.4	Adjusted Valve
NILMW031	12/1/2021 15:29	5.4	Second Reading
NILMW031	12/17/2021 13:33	4.7	In Compliance
NILMW031	1/21/2022 12:12	5.8	Adjusted Valve
NILMW031	1/21/2022 12:14	5.9	Second Reading; Well remains in exceedance and compliance will be documented in the next report.
NILMW032	9/2/2021 12:26	12.9	Adjusted Valve
NILMW032	9/2/2021 12:31	13.4	Second Reading
NILMW032	9/3/2021 9:09	1.4	In Compliance
NILMW033	9/3/2021 8:29	5.9	Adjusted Valve
NILMW033	9/3/2021 8:31	5.8	Second Reading

**Table 4. Wells with Oxygen Exceedances
Newby Island Landfill, Milpitas, California
(August 1, 2021 through January 31, 2022)**

Well ID	Date and Time	Oxygen (%)	Comments
NILMW033	9/20/2021 10:39	5.4	Adjusted Valve
NILMW033	9/20/2021 10:41	5.4	Second Reading
NILMW033	10/4/2021 11:15	3.3	In Compliance
NILMW034	8/20/2021 10:09	8.6	(Initial Exceedance was on 7/8) Adjusted Valve
NILMW034	8/20/2021 10:12	8.3	Second Reading
NILMW034	9/3/2021 8:25	11	Adjusted Valve
NILMW034	9/3/2021 8:27	10.9	Second Reading
NILMW034	9/29/2021 14:06	8.4	Adjusted Valve
NILMW034	9/29/2021 14:08	17.6	Second Reading
NILMW034	10/4/2021 11:12	0	In Compliance
NILMW034	10/19/2021 10:54	16.2	Adjusted Valve
NILMW034	10/19/2021 10:55	15.7	Second Reading
NILMW034	11/2/2021 13:33	6.3	Adjusted Valve
NILMW034	11/2/2021 13:35	0	In Compliance
NILMW034	11/16/2021 15:18	13.3	Adjusted Valve
NILMW034	11/16/2021 15:20	13.3	Second Reading
NILMW034	12/1/2021 15:19	6.3	Adjusted Valve
NILMW034	12/17/2021 13:27	8.2	Adjusted Valve
NILMW034	1/13/2022 12:52	4.3	In Compliance
NILMW034	1/21/2022 12:46	5.4	Adjusted Valve
NILMW034	1/21/2022 12:49	5.4	Second Reading; Well remains in exceedance and compliance will be documented in the next report.
NILW573A	8/9/2021 14:03	20.6	(Initial Exceedance was on 6/10) Adjusted Valve
NILW573A	8/9/2021 14:05	20.7	Second Reading
NILW573A	8/19/2021 12:15	20.7	Adjusted Valve
NILW573A	8/19/2021 12:17	20.3	Second Reading
NILW573A	9/14/2021 12:45	20.2	Adjusted Valve
NILW573A	9/14/2021 12:48	20.2	Second Reading
NILW573A	9/20/2021 17:35	20.9	Adjusted Valve
NILW573A	9/20/2021 17:36	20.7	Well Permanently Decommissioned Due to Poor Gas Quality
NILW574A	8/5/2021 11:36	15.6	(Initial Exceedance was on 7/23) Adjusted Valve
NILW574A	8/9/2021 13:51	20.7	Adjusted Valve
NILW574A	8/9/2021 13:54	9.2	Second Reading
NILW574A	8/9/2021 13:55	8.9	Third Reading
NILW574A	8/19/2021 12:08	4.5	In Compliance

**Table 4. Wells with Oxygen Exceedances
Newby Island Landfill, Milpitas, California
(August 1, 2021 through January 31, 2022)**

Well ID	Date and Time	Oxygen (%)	Comments
NILW574A	9/14/2021 12:41	16.3	Adjusted Valve
NILW574A	9/14/2021 12:43	18	Second Reading
NILW574A	9/20/2021 17:38	18.3	Adjusted Valve
NILW574A	9/20/2021 17:39	18.2	Well Permanently Decommissioned Due to Poor Gas Quality
NILW632A	10/21/2021 14:16	8	Adjusted Valve
NILW632A	10/21/2021 14:19	7.2	Second Reading
NILW632A	11/3/2021 18:30	6.6	Adjusted Valve
NILW632A	11/3/2021 18:31	5.8	Second Reading
NILW632A	11/18/2021 10:07	2.6	In Compliance
NILW632A	12/6/2021 12:02	8.2	Adjusted Valve
NILW632A	12/6/2021 12:06	5.6	Second Reading
NILW632A	12/17/2021 15:40	13	Adjusted Valve
NILW632A	1/3/2022 14:07	4.7	In Compliance
NILW728A	1/28/2022 14:02	8.5	Adjusted Valve
NILW728A	1/28/2022 14:05	10.4	Second Reading; Well remains in exceedance and compliance will be documented in the next report.
NISS17-1	9/20/2021 12:42	8.8	Adjusted Valve
NISS17-1	9/29/2021 15:05	3.9	In Compliance
NISS17-4	8/9/2021 14:48	10.9	Adjusted Valve
NISS17-4	8/28/2021 8:05	15.1	Adjusted Valve
NISS17-4	8/28/2021 8:09	12.4	Second Reading
NISS17-4	8/30/2021 16:57	7.9	Adjusted Valve
NISS17-4	8/30/2021 16:59	8	Second Reading
NISS17-4	9/10/2021 11:05	10	Adjusted Valve
NISS17-4	9/10/2021 11:05	10	Second Reading
NISS17-4	9/10/2021 11:07	9.9	Third Reading
NISS17-4	9/17/2021 14:16	0	In Compliance
NISS17-4	9/24/2021 15:50	20.3	Adjusted Valve
NISS17-4	10/7/2021 10:58	0	In Compliance
NISS17-6	11/24/2021 13:39	6.8	Adjusted Valve
NISS17-6	11/24/2021 13:44	6.9	Second Reading
NISS17-6	12/6/2021 13:11	0.3	In Compliance
NLCRST05	8/23/2021 10:35	6.4	(Initial Exceedance was on 7/29) Adjusted Valve
NLCRST05	8/23/2021 10:39	6.4	Second Reading

**Table 4. Wells with Oxygen Exceedances
Newby Island Landfill, Milpitas, California
(August 1, 2021 through January 31, 2022)**

Well ID	Date and Time	Oxygen (%)	Comments
NLCRST05	9/13/2021 11:34	19	Adjusted Valve
NLCRST05	9/13/2021 11:35	18.8	Second Reading
NLCRST05	9/28/2021 12:04	0.8	In Compliance

**Table 4. Wells with Oxygen Exceedances
Newby Island Landfill, Milpitas, California
(August 1, 2021 through January 31, 2022)**

Well ID	Date and Time	Oxygen (%)	Comments
NLCRST05	1/8/2022 14:12	20.8	Adjusted Valve
NLCRST05	1/8/2022 14:14	20.7	Second Reading
NLCRST05	1/21/2022 13:24	0	In Compliance

Note: All required corrective action and monitoring was completed in accordance with Rule 8-34 and NSPS timelines

**Table 5. Wells with Temperature Exceedances
Newby Island Landfill, Milpitas, California
(August 1, 2021 through January 31, 2022)**

Well ID	Date and Time	Initial Temp [°F]	Adjusted Temp [°F]	Comments
NILEW476	8/24/2021 10:06	131.1	131.1	Adjusted Valve
NILEW476	8/30/2021 13:47	128.2	128.6	In Compliance*
NILEW476	9/29/2021 12:02	131.5	130.7	Adjusted Valve, In Compliance*
NILEW688	8/24/2021 10:12	132.1	132.4	Adjusted Valve
NILEW688	8/24/2021 10:15	132.8	132.7	Second Reading
NILEW688	9/2/2021 11:57	130.9	130.9	In Compliance*
NILEW688	9/29/2021 12:32	131.1	131.7	Adjusted Valve
NILEW688	9/29/2021 12:34	131.6	131.6	Second Reading
NILEW688	10/14/2021 9:20	131.2	131.2	Adjusted Valve
NILEW688	10/20/2021 14:24	130.6	130.6	In Compliance**
NILEW690	8/10/2021 16:05	133.7	133.8	(Initial Exceedance 5/27) Adjusted Valve
NILEW690	8/10/2021 16:07	133.9	134	Second Reading
NILEW690	8/24/2021 9:45	134.4	135.2	Adjusted Valve
NILEW690	8/24/2021 9:47	134.2	134.9	Second Reading
NILEW690	9/2/2021 11:44	133.6	126.1	In Compliance; 75 day notification was submitted on 8/10/21.
NILEW690	9/17/2021 15:24	133.4	112.3	Adjusted Valve, In Compliance*
NILEW690	9/29/2021 15:26	134.8	135.7	Adjusted Valve
NILEW690	9/29/2021 15:29	136	136	Second Reading
NILEW690	10/13/2021 15:00	132.3	132.4	Adjusted Valve
NILEW690	10/13/2021 15:02	132.8	132.8	Second Reading
NILEW690	10/20/2021 13:21	132.4	132.5	Adjusted Valve
NILEW690	10/20/2021 13:24	132.3	132.3	Second Reading
NILEW690	11/2/2021 11:35	133.6	133.7	Adjusted Valve
NILEW690	11/2/2021 11:38	133.5	133.6	Second Reading
NILEW690	11/16/2021 13:17	133.9	133.9	Adjusted Valve
NILEW690	11/24/2021 13:12	133.3	133.1	Adjusted Valve
NILEW690	11/24/2021 13:14	133.1	133.1	Second Reading
NILEW690	11/24/2021 13:17	132.3	132.4	Third Reading
NILEW690	12/9/2021 11:54	132.5	132.5	Adjusted Valve
NILEW690	12/9/2021 11:56	132.9	132.9	Second Reading
NILEW690	12/30/2021 10:49	131	131.9	Adjusted Valve
NILEW690	12/30/2021 10:52	132.4	132.4	Second Reading
NILEW690	1/7/2022 13:18	131.5	129.8	Adjusted Valve, In Compliance; 75 day notification was submitted on 12/13.
NILEW690	1/17/2022 12:46	133.4	134.6	Adjusted Valve
NILEW690	1/17/2022 12:48	134.2	134.2	Second Reading
NILEW690	1/25/2022 15:22	132.5	132.6	Adjusted Valve
NILEW690	1/25/2022 15:42	133	133	Well remains in exceedance and compliance will be documented in the next report.
NILEW701	8/10/2021 15:51	136.7	137.1	(Initial Exceedance was 6/10) Adjusted Valve

**Table 5. Wells with Temperature Exceedances
Newby Island Landfill, Milpitas, California
(August 1, 2021 through January 31, 2022)**

Well ID	Date and Time	Initial Temp [°F]	Adjusted Temp [°F]	Comments
NILEW701	8/10/2021 15:55	136.9	137.1	Second Reading
NILEW701	8/24/2021 8:48	136.6	137.6	Adjusted Valve
NILEW701	8/24/2021 8:49	136.2	136.7	Second Reading
NILEW701	9/2/2021 11:31	136.9	130.6	Adjusted Valve, In Compliance; 75-day notification was submitted 8/24/21.
NILEW701	9/9/2021 16:40	135.5	135.5	Adjusted Valve
NILEW701	9/9/2021 16:42	134.7	134.8	Second Reading
NILEW701	9/17/2021 14:47	96.7	96.9	In Compliance*
NILEW701	10/14/2021 10:37	131.4	133.4	Adjusted Valve
NILEW701	10/14/2021 10:39	133.5	133.5	Second Reading
NILEW701	10/18/2021 16:09	132.3	132.3	Adjusted Valve
NILEW701	10/18/2021 16:11	131.7	131.9	Second Reading
NILEW701	11/2/2021 16:14	135	135.5	Adjusted Valve
NILEW701	11/2/2021 16:15	135	135.3	Second Reading
NILEW701	11/17/2021 10:54	133.4	134.2	Adjusted Valve
NILEW701	11/17/2021 10:55	134.7	134.7	Second Reading
NILEW701	12/9/2021 12:28	133.4	133.9	Adjusted Valve
NILEW701	12/9/2021 12:29	134.1	134.1	Second Reading
NILEW701	12/17/2021 13:02	133.8	133.8	Adjusted Valve
NILEW701	12/17/2021 13:05	133.7	133.7	Second Reading
NILEW701	1/7/2022 13:10	132.8	129.9	Adjusted Valve, In Compliance; 75 day notification was submitted on 12/31/21.
NILEW703	8/10/2021 16:01	131.2	131.3	Adjusted Valve
NILEW703	8/10/2021 16:02	131.3	131.3	Second Reading
NILEW703	8/18/2021 13:12	132.1	132.3	Adjusted Valve
NILEW703	8/18/2021 13:14	132.2	132.1	Second Reading
NILEW703	8/20/2021 8:59	131.4	131.6	Adjusted Valve
NILEW703	9/9/2021 16:47	130.5	130.7	In Compliance**
NILEW733	9/14/2021 10:29	132.7	132.7	Adjusted Valve
NILEW733	9/14/2021 10:31	133.2	133.3	Second Reading
NILEW733	10/22/2021 13:05	95.5	106.2	In Compliance**
NILEW735	11/2/2021 12:42	130.7	131.1	Adjusted Valve
NILEW735	11/2/2021 12:44	130.5	130.6	In Compliance*
NILEW735	11/16/2021 14:03	132.5	132.9	Adjusted Valve
NILEW735	11/16/2021 14:05	133.1	133.2	Second Reading
NILEW735	12/1/2021 16:08	129.3	129.5	In Compliance*
NILEW752	8/12/2021 13:08	138.1	138.1	(Initial Exceedance was on 6/10) Adjusted Valve
NILEW752	8/12/2021 13:11	138.2	138.3	Second Reading
NILEW752	8/24/2021 9:49	136.5	136.6	Adjusted Valve
NILEW752	8/24/2021 10:10	136.8	136.9	Second Reading
NILEW752	9/2/2021 11:20	137.9	127.9	In Compliance; 75 day notification was submitted on 8/24/21.

**Table 5. Wells with Temperature Exceedances
Newby Island Landfill, Milpitas, California
(August 1, 2021 through January 31, 2022)**

Well ID	Date and Time	Initial Temp [°F]	Adjusted Temp [°F]	Comments
NILEW752	9/29/2021 11:52	138.6	138.6	Adjusted Valve
NILEW752	9/29/2021 11:55	138.7	138.6	Second Reading
NILEW752	10/13/2021 15:11	137.8	137.8	Adjusted Valve
NILEW752	10/20/2021 13:38	137.3	137.2	Adjusted Valve
NILEW752	10/20/2021 13:41	116	114.6	In Compliance**
NILEW752	11/2/2021 11:26	136.2	136.2	Adjusted Valve
NILEW752	11/2/2021 11:28	136.6	136.6	Second Reading
NILEW752	11/16/2021 12:55	135.8	135.8	Adjusted Valve
NILEW752	11/16/2021 12:58	136.3	136.3	Second Reading
NILEW752	11/24/2021 13:08	136.4	136.5	Adjusted Valve
NILEW752	11/24/2021 13:10	136.2	136.2	Second Reading
NILEW752	12/9/2021 11:47	136.6	136.6	Adjusted Valve
NILEW752	12/9/2021 11:48	136.4	136.4	Second Reading
NILEW752	12/30/2021 10:37	133.1	132.8	Adjusted Valve
NILEW752	12/30/2021 10:48	123.1	127	In Compliance**
NILEW752	1/7/2022 14:02	132.4	132.4	Adjusted Valve
NILEW752	1/7/2022 14:05	133.3	133.3	Second Reading
NILEW752	1/17/2022 12:38	136.6	136.5	Adjusted Valve
NILEW752	1/17/2022 12:40	136.5	136.5	Well remains in exceedance and compliance will be documented in the next report.
NILEW757	8/23/2021 11:42	132.3	133.2	Adjusted Valve
NILEW757	8/26/2021 16:16	142.3	142.4	Second Reading
NILEW757	8/28/2021 10:51	95.6	95.6	In Compliance*
NILEW757	8/30/2021 10:14	141.8	141.9	Adjusted Valve
NILEW757	8/30/2021 10:17	142.2	142.3	Second Reading
NILEW757	9/1/2021 8:39	120.8	121.4	In Compliance*
NILEW757	9/3/2021 14:47	137	137.1	Adjusted Valve
NILEW757	9/3/2021 14:49	137.6	137.6	Second Reading
NILEW757	9/8/2021 14:22	107.5	107.4	In Compliance*
NILEW757	9/9/2021 11:48	145.6	145.7	Adjusted Valve
NILEW757	9/10/2021 8:28	75.4	75.3	In Compliance*
NILEW757	9/10/2021 8:44	141.8	141.8	Adjusted Valve
NILEW757	9/11/2021 16:21	140.9	141.4	Second Reading
NILEW757	9/14/2021 15:59	86.1	86.1	In Compliance*
NILEW757	10/18/2021 16:46	131.2	131.2	Adjusted Valve
NILEW757	10/19/2021 15:53	131.2	131.3	Adjusted Valve
NILEW757	10/19/2021 15:55	131.3	131.3	Second Reading
NILEW757	10/21/2021 12:15	126.2	126.3	In Compliance*

Note: All required corrective action and remonitoring was completed in accordance with Rule 8-34 and NSPS timelines.

*Wells corrected within 15-days

**Wells not corrected within 15 days, but within 60 days for which root cause analyses were conducted.

Appendix A – Responsible Official Certification Form

Certification of Truth and Accuracy and Completeness:

I certify the following:

Based on the information and belief formed after reasonable inquiry, the information in this document are true, accurate, and complete:



02/22/2022

Signature of Responsible Official

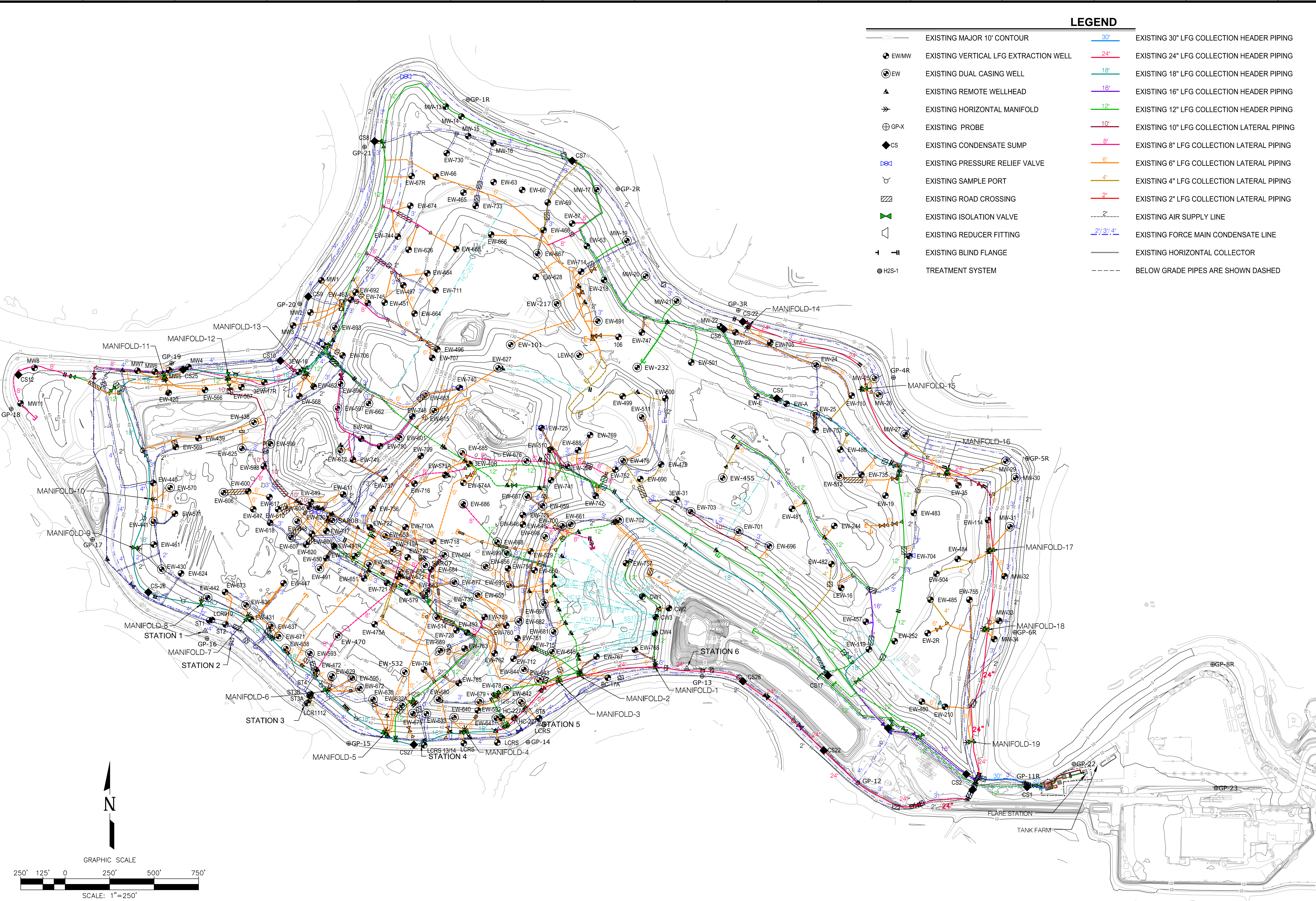
Date

Daniel North

Name of Responsible Official

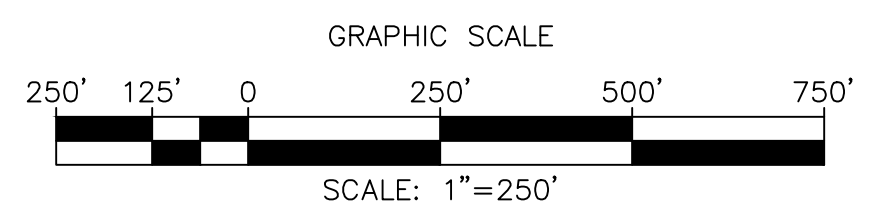
Appendix B – Existing GCCS Layout

C:\Users\4747a_s\Desktop\Newby_Island_LF - Task 2 - As-Built Drawings\NEWBY_LF_GCCS_LAYOUT\ASBUILT_SITE_UPDATE_062221.dwg Jun 29, 2021 - 9:56am By: 4747a_s



LEGEND

- | | | | |
|--|---------------------------------------|--|--|
| | EXISTING MAJOR 10' CONTOUR | | EXISTING 30" LFG COLLECTION HEADER PIPING |
| | EXISTING VERTICAL LFG EXTRACTION WELL | | EXISTING 24" LFG COLLECTION HEADER PIPING |
| | EXISTING DUAL CASING WELL | | EXISTING 18" LFG COLLECTION HEADER PIPING |
| | EXISTING REMOTE WELLHEAD | | EXISTING 16" LFG COLLECTION HEADER PIPING |
| | EXISTING HORIZONTAL MANIFOLD | | EXISTING 12" LFG COLLECTION HEADER PIPING |
| | EXISTING PROBE | | EXISTING 10" LFG COLLECTION LATERAL PIPING |
| | EXISTING CONDENSATE SUMP | | EXISTING 8" LFG COLLECTION LATERAL PIPING |
| | EXISTING PRESSURE RELIEF VALVE | | EXISTING 6" LFG COLLECTION LATERAL PIPING |
| | EXISTING SAMPLE PORT | | EXISTING 4" LFG COLLECTION LATERAL PIPING |
| | EXISTING ROAD CROSSING | | EXISTING 2" LFG COLLECTION LATERAL PIPING |
| | EXISTING ISOLATION VALVE | | EXISTING AIR SUPPLY LINE |
| | EXISTING REDUCER FITTING | | EXISTING FORCE MAIN CONDENSATE LINE |
| | EXISTING BLIND FLANGE | | EXISTING HORIZONTAL COLLECTOR |
| | TREATMENT SYSTEM | | BELOW GRADE PIPES ARE SHOWN DASHED |



DATE	
REVISION	
NO.	
SHEET TITLE:	OVERALL 2021 AS-BUILT PLAN
PROJECT TITLE:	NEWBY ISLAND LANDFILL MILPITAS, CALIFORNIA
CLIENT:	
DATE:	062221
SCALE:	AS SHOWN
SHEET:	1

SCS ENGINEERS
ENVIRONMENTAL CONSULTANTS

1500 BAYVIEW AVENUE, SUITE 250
SAN DIEGO, CA 92125
(858) 571-5500 FAX (62) 427-0805

PROJ. NO: 01221039.01 T2
DWN. BY: AAS
CHK. BY: MD

ACAD FILE: K:\ENGINEERS
APP. BY: MD

Appendix C – Surface Emission and GCCS Component Leak Monitoring Results

October 14, 2021
File No. 07221077.00

Ms. Rachelle Huber
Republic Services – Newby Island Landfill
1601 Dixon Landing Road
Milpitas, California 95035

Subject: Newby Island Landfill - Milpitas, California

Landfill Methane Rule (LMR) and New Source Performance Standards (NSPS)
Surface Emissions Monitoring for Third Quarter 2021.

Dear Ms. Huber:

SCS Field Services (SCS) is pleased to provide the Republic Services, with the enclosed report summarizing the surface emissions monitoring services provided at the Newby Island Landfill (Site) during the Third Quarter 2021. This report includes the results of surface scan, component emissions and blower/flare station emissions monitoring for the Site for this monitoring period.

SCS appreciates the opportunity to be of assistance to Republic Services on this project. As you review the enclosed information, please contact Michael Flanagan at (510) 363-7796 or Whitney Stackhouse at (209) 338-7990 if you have any questions or comments.

Sincerely,



Whitney Stackhouse
Project Manager
SCS Field Services



Michael Flanagan
Project Manager
SCS Field Services

Encl.

Sean Bass, SCS Field Services
Art Jones, SCS Field Services



Newby Island Landfill

Landfill Methane Rule (LMR) and New Source Performance Standards (NSPS) Surface Emissions Monitoring

Third Quarter 2021

Presented to:



Ms. Rachelle Huber
Republic Services – Newby Island
1601 Dixon Landing Road
Milpitas, California 95035

SCS FIELD SERVICES

File No. 07221077.00 Task 01 | October 14, 2021

SCS FIELD SERVICES
4730 Enterprise Way Suite A
Modesto, CA 95356

Newby Island Landfill

Landfill Methane Rule (LMR) and New Source Performance Standards (NSPS) Surface Emissions Monitoring Third Quarter 2021

INTRODUCTION

This letter provides results of the July 12, 13, 14, 15, 19, 22, 23, and 30, 2021, LMR and NSPS landfill surface emissions monitoring (SEM) performed by SCS Field Services (SCS) at the subject site. All work was performed in accordance with our approved Work Scope dated December 23, 2020, and the LMR requirements.

SUMMARY AND CONCLUSIONS

As stipulated in LMR, if uncorrectable exceedances within the 10-day limitation are detected or emissions are discovered during an inspection by Regulatory Agencies, the landfill must perform monitoring on a 25-foot pathway on a quarterly basis for active disposal sites. Upon completion of four consecutive SEM events without an uncorrectable exceedance of the 25 ppmv or 500 ppmv standards, other than non-repeatable momentary readings, the landfill may perform the monitoring on a 100-foot spacing on an annual basis for closed landfills or quarterly for active disposal sites. Therefore, based on the previous monitoring events, in which exceedances were observed, the monitoring at the Newby Island Landfill was performed on 25-foot pathways in accordance with the LMR.

On, July 12, 13, 14, 15, 19, 22, 23, and 30, 2021, SCS performed third quarter 2021 SEM as required by the Bay Area Air Quality Management District (BAAQMD). Instantaneous surface emissions monitoring results indicated that forty (40) locations exceeded the 500 ppmv maximum concentration during the initial monitoring event (Table 1 in Attachment 3). The required first and second 10-day (LMR/NSPS) follow-up monitoring indicated that all areas did not return to below regulatory compliance limits following system adjustments and remediation (well field adjustments and installation of new bentonite plugs) by site personnel. Based on these monitoring results, and in accordance with the NSPS, the site is required to perform a system expansion within 120-days of the initial detected exceedance which will be due on November 12, 2021. These results are discussed in a subsequent section of this report.

Also, during the instantaneous monitoring event, SCS performed concurrent integrated monitoring of the landfill surface. As required by the LMR, the landfill was divided into 50,000 square foot areas. The Newby Island Landfill surface area was therefore divided into 233 grids, as shown on Figure 1 in Attachment 1. During this monitoring event, several grids were not monitored, in accordance with the regulations, due to ongoing active landfilling activities, unsafe conditions, or there was no waste in place prior to the monitoring event.

During the monitoring event, there were eight (8) grid areas observed to exceed the 25 ppmv LMR integrated average threshold (Table 2 in Attachment 4). The required first and second 10-day LMR

follow-up monitoring indicated that all areas had did not to compliance following system adjustments and remediation by SCS and site personnel. Based on these monitoring results no additional follow up testing was required at this time.

In addition, quarterly monitoring of the pressurized piping or components of the Gas Collection and Control System (GCCS) that are under positive pressure must be performed. Results of the testing of the landfill gas (LFG) Blower Flare Station (BFS) pressurized piping and components indicated that one location tested, the flame arrestor, was not in compliance with the 500 ppmv requirement. The required 7-day follow up monitoring in dictated compliance with the rule and no further testing is required.

Further, as required under the LMR, any location on the landfill that has an observed instantaneous methane concentration above 200 ppmv, must be stake-marked and Global Positioning System (GPS) located on a site figure. During this reporting period, two (2) locations were observed to exceed the 200 ppmv, reporting threshold. When these readings are observed, the locations are reported to site personnel for tracking and/or remediation and will be reported in the next submittal of the annual LMR report.

Finally, to help prevent potential future exceedances, SCS recommends that the landfill surface be routinely inspected and any observed surface erosion be routinely repaired.

BACKGROUND

The Newby Island Landfill is an active 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 gas, 40 to 50 percent carbon dioxide, and trace amount of various other gases, some of which are odorous. The Newby Island property contains a system to control the combustible gases generated in the landfill.

SURFACE EMISSIONS MONITORING

On July 12, 13, 14, 15, 19, 22, 23, and 30, 2021, the instantaneous and integrated SEM was performed over the surface of the subject site. The intent of the monitoring was to identify any specific locations or areas of the landfill surface with organic compound concentrations exceeding the LMR threshold limit values of 500 ppmv measured as methane for instantaneous monitoring, or an average methane concentration of 25 ppmv for the integrated monitoring in the 50,000 square foot grids as required under the LMR. During this event, SCS performed the monitoring on a 25-foot pathway in accordance with the rules as required.

EMISSIONS TESTING INSTRUMENTATION/CALIBRATION

Instruments used to perform the landfill surface emission 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 TVA 2020 meets the State of California Air Resources Board (CARB) requirements for combined instantaneous and integrated monitoring and was calibrated in accordance with United States Environmental Protection Agency (US EPA) Method 21.
- Weather Anemometer with continuous recorder for meteorological conditions in accordance with the LMR.

Instrument calibration logs and weather information are shown in Attachments 5 and 6.

SURFACE EMISSIONS MONITORING PROCEDURES

Surface emissions monitoring was conducted in accordance with the LMR and NSPS requirements. Monitoring was performed with the FID inlet held within 3-inches of the landfill surface while a technician walked a grid in parallel paths not more than 25 -feet apart over the surface of the landfill. Cracks, holes and other cover penetrations in the surface were also tested. Surface emissions readings were monitored continuously and recorded every 5 seconds. Any areas in exceedance of the 200 or 500 ppmv standards (reporting and compliance levels, respectively) would be GPS tagged and stake-marked for on-site personnel to perform remediation or repairs.

The integrated average is based on the readings stored on the instrument, which are recorded every 5 seconds. The readings are then downloaded and the averages are calculated for each grid using SCS eTools®. All readings are maintained in this secure SCS Database. The readings are not provided in the report due to the volume of readings, but can be furnished upon request.

Recorded wind speed results are shown in Attachment 6. Wind speed averages were observed to remain below the alternative threshold of 10 miles per hour, and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within 72 hours of the monitoring events. Therefore, site meteorological conditions were within the alternatives of the LMR requirements on the above mentioned dates.

TESTING RESULTS

During this event, SCS performed the monitoring on a 25-foot pathway in accordance with the rule as required under the LMR and NSPS. The intent of the monitoring was to identify any specific locations or areas of the landfill surface with organic compound concentrations exceeding the LMR or NSPS threshold limit values of 500 ppmv measured as methane for instantaneous monitoring, or an average methane concentration of 25 ppmv for the integrated monitoring (LMR).

On July 12, 13, 14 and 15, 2021, SCS performed third quarter 2021 instantaneous emissions monitoring testing as required by the BAAQMD. During this monitoring, surface emissions results indicated that forty (40) locations exceeded the 500 ppmv maximum concentration. The required first and second-day (LMR/NSPS) follow-up monitoring performed on July 23 and 30, 2021, respectively, indicated that seventeen (17) locations did not remain below compliance limits as required, following system adjustments and remediation (wellfield adjustment and borehole repairs using bentonite and soil) performed by SCS and site personnel. In accordance with NSPS requirements for expansion and remediation, the exceedance locations need to be remediated and returned to compliance in accordance with the rule (expansion of the collection system or an alternative compliance option if approved by the BAAQMD) within 120 days of the detected initial instantaneous exceedance, which will be due by November 12, 2021. Results of the initial and follow up monitoring are shown in Attachments 2 and 3 (Table 1).

Additionally, calculated integrated grid monitoring indicated eight (8) integrated exceedances of the 25-ppmv requirement on July 12 and 14, 2021. The required first and second 10-day LMR follow-up monitoring performed on July 22, 23 and 30, 2021, indicated that all areas had not returned to compliance following system adjustments and remediation by site personnel. In accordance with LMR requirements for expansion and remediation, the exceedance locations need to be remediated and returned to compliance in accordance with the rule (expansion of the collection system or an alternative compliance option if approved by the BAAQMD) within 120 days of the third observed

integrated exceedance, which will be due by November 27, 2021. Results of the initial and follow up monitoring are shown in Attachment 4 (Table 2). Calibration logs for the monitoring equipment are provided in Attachment 5.

During this monitoring event, several grids were not monitored, in accordance with the LMR, due to active landfilling activities, unsafe conditions or no waste in place. SCS will continue to monitor all accessible locations during the fourth quarter 2021.

PRESSURIZED PIPE AND COMPONENT LEAK MONITORING

On July 12, 2021, quarterly leak monitoring was performed in accordance with the LMR. SCS performed LFG pressurized pipe and component leak monitoring at the BFS. Monitoring was performed with the detector inlet held one-half of an inch from pressurized pipe and associated components. One location exceeding the 500 ppmv threshold was observed during our monitoring event. The required 7/10-day 8-34 and LMR monitoring results indicated the location had returned to below compliance limits and no further monitoring is required at this time, (see Table 1 for component results).

PROJECT SCHEDULE

According to the LMR and NSPS, surface emissions monitoring at active landfills is required to be performed on a quarterly basis. Therefore, in accordance with our approved Work Scope, the fourth quarter 2021 (October through December) surface emissions testing event is scheduled to be performed by the end of November 2021 in accordance with the Republic SOP unless an alternative timeline is requested by site personnel.

STANDARD PROVISIONS

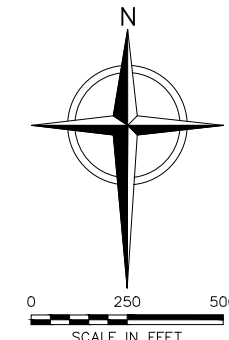
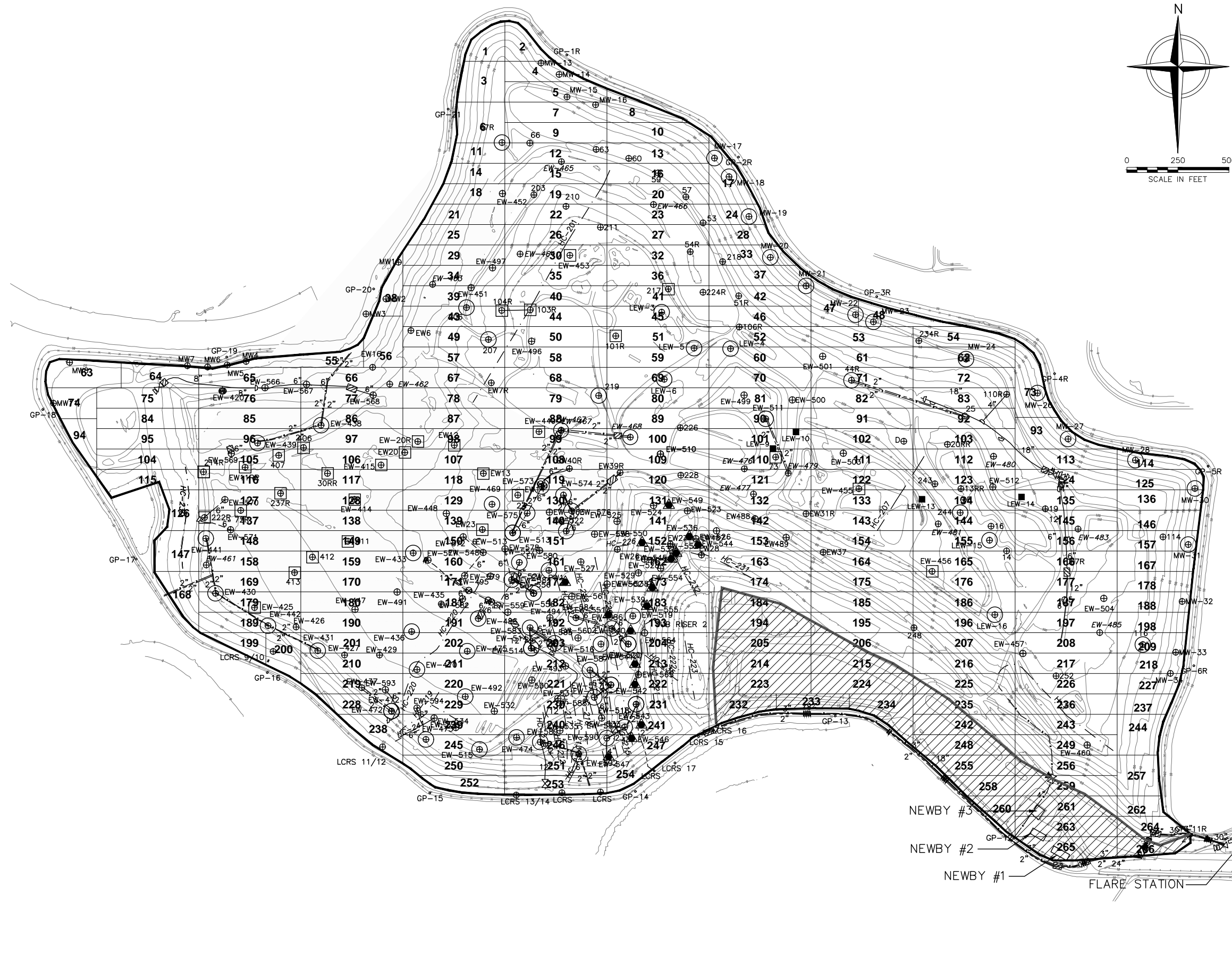
This report addresses conditions of the subject site during the testing dates only. Accordingly, we assume no responsibility for any changes that may occur subsequent to our testing which could affect the surface emissions at the subject site or adjacent properties.

Attachment 1

Landfill Grid

1" = 1/2" 0"

File: X:\PROJECTS\NEWBY ISLAND\DWG\NEWBYSS-2015 SEM GRID MAP.dwg Layout: SH1 3 User: russell.williams Sep 12, 2016 - 3:29pm



LEGEND

- EXISTING SOLID WASTE BOUNDARY
- EXISTING 10' CONTOUR
- SEM GRID BLOCK
- SEM GRID BLOCK WITH NO WASTE IN PLACE
- APPROXIMATE BOUNDARY OF NO WASTE IN PLACE
- EXISTING HORIZONTAL COLLECTOR PIPE
- EXISTING SIDE SLOPE COLLECTOR
- GP-16 ○ EXISTING LANDFILL GAS MONITORING PROBE
- ⊕ EXISTING GAS/LEACHATE EXTRACTION WELL
- ⊕ EXISTING VERTICAL GAS EXTRACTION WELL (ABOVE GRADE)
- ⊕ EXISTING VERTICAL GAS EXTRACTION WELL (BELOW GRADE/REMOTE WELLHEAD)
- ▲ EW-536 EXISTING SHALLOW LFG EXTRACTION WELL
- LEW-13 EXISTING LEACHATE EXTRACTION WELL
- LCRS 15 EXISTING LANDFILL LCRS RISER

- NOTES:
1. THE 2016 BASE TOPOGRAPHIC MAP WAS CREATED BY COOPER AERIAL SURVEYS USING PHOTOGRAMMETRIC METHODS. DATE OF PHOTOGRAPHY: FEBRUARY 29, 2016. SUPPLEMENTAL TOPOGRAPHY PROVIDED BY RJA & ASSOCIATES DATED APRIL 2016.
 2. THE 2010 BASE AS-BUILT WELL LOCATIONS AND 2010 AS-BUILT PIPE LOCATIONS WERE PROVIDED BY THE SITE. WELLS EW-487 THROUGH EW-489 ARE PER DESIGN LOCATIONS, NO SURVEY WAS RECEIVED FOR THESE WELLS. AS-BUILT LOCATIONS FOR HC-223 AND LCRS-17 ARE APPROXIMATE, NO SURVEY WAS RECEIVED FOR THESE WELLS.
 3. THE 2015 GCCS AS-BUILT WELL LOCATIONS AND AS-BUILT PIPE LOCATIONS WERE PROVIDED BY RJA SURVEYOR ON APRIL 27, JUNE 19, JUNE 24, OCTOBER 26, AND DECEMBER 1, 2015.
 4. THE 2016 GCCS AS-BUILT WELL AND PIPE LOCATIONS WERE PROVIDED BY RUGGERI, JENSEN, AZAR AND ASSOCIATES, DATE OF SURVEY: APRIL 6 AND MAY 12, 2016.

DRAFT

REV	DATE	DESCRIPTION	DWN BY	DES BY	CHK BY	APP BY

PREPARED BY:
CORNERSTONE ENVIRONMENTAL GROUP, LLC

This drawing represents intellectual property of Cornerstone Environmental Group LLC. Any modification to the original by other than Cornerstone Environmental Group LLC personnel violates the original purpose and as such is rendered void. Cornerstone Environmental Group LLC will not be held liable for any changes made to this document without express written consent of the originator.

NEWBY ISLAND SANITARY LANDFILL
ALAMEDA COUNTY, CALIFORNIA

**SURFACE EMISSIONS MONITORING
GRID MAP**

SHEET NO.
1

PROJECT NO.
150118

Attachment 2

Surface Pathway

Attachment 3

Instantaneous and Component Emissions Monitoring Results

Third Quarter 2021

**Table 1. LMR Instantaneous Surface and Component
Emissions Monitoring Results**

Newby Island Sanitary Landfill, Milpitas, California

*Instantaneous Data Report for July 12, 13, 14,
15, 19, 22, 23, and 30, 2021*

Location Well ID or Grid Number	Initial Monitoring (ppmv)	10-Day Follow Up Monitoring (ppmv)	20-Day Follow Up Monitoring (ppmv)	30-Day Follow Up Monitoring (ppmv)	Latitude	Longitude
	July 15, 2021	July 23, 2021	July 30, 2021	NA		
CS10	1,320	2,200	300	--	37.461169°	-121.947535°
CS8	1,699	Active	Active	--	37.464610°	-121.945657°
Edge of liner sign	1,100	20,000	3,100	--	37.455261°	-121.943112°
NILCW003	826	1,000	5	--	37.455805°	-121.946551°
NILEW460	865	173	NA	--	37.456016°	-121.934955°
NILEW461	786	1,541	150	--	37.458282°	-121.949865°
NILEW464	10,000	217	NA	--	37.462511°	-121.944659°
NILEW569	1,420	0	50	--	37.459759°	-121.949505°
NILEW582	1,300	950	400	--	37.457860°	-121.945523°
NILEW598	1,711	1,711	636	--	37.459471°	-121.947809°
NILEW611	4,000	4,000	Active	--	37.459092°	-121.946248°
NILEW617	1,100	988	4	--	37.458989°	-121.947643°

Third Quarter 2021

**Table 1. LMR Instantaneous Surface and Component
Emissions Monitoring Results
Newby Island Sanitary Landfill, Milpitas, California**

Location Well ID or Grid Number	Initial Monitoring (ppmv) July 15, 2021	10-Day Follow Up Monitoring (ppmv) July 23, 2021	20-Day Follow Up Monitoring (ppmv) July 30, 2021	30-Day Follow Up Monitoring (ppmv) NA	Latitude	Longitude
NILEW620	1,200	5,000	4,500	--	37.458292°	-121.946905°
NILEW629	1,314	40	NA	--	37.456271°	-121.946397°
NILEW638	13,000	13,000	1,000	--	37.456687°	-121.947289°
NILEW640	1,250	317	NA	--	37.455642°	-121.943977°
NILEW650	2,000	985	1,000	--	37.458292°	-121.946358°
NILEW652	2,300	2,300	3,300	--	37.458012°	-121.945669°
NILEW653	1,000	60,000	3,600	--	37.458437°	-121.945393°
NILEW654	5,200	5,500	100	--	37.457990°	-121.944905°
NILEW674	1,460	7	NA	--	37.463556°	-121.944990°
NILEW675	1,255	145	NA	--	37.455714°	-121.944801°
NILEW677	1,211	360	NA	--	37.457685°	- 121.9440461°
NILEW682	3,000	13,000	5,000	--	37.457181°	-121.942758°
NILEW683	60,000	13,000	800	--	37.457591°	-121.944523°
NILEW695	1,200	5,000	4,500	--	37.457731°	-121.942987°
NILEW695	5,115	5,115	Active	--		

Third Quarter 2021

**Table 1. LMR Instantaneous Surface and Component
Emissions Monitoring Results
Newby Island Sanitary Landfill, Milpitas, California**

Location Well ID or Grid Number	Initial Monitoring (ppmv) July 15, 2021	10-Day Follow Up Monitoring (ppmv) July 23, 2021	20-Day Follow Up Monitoring (ppmv) July 30, 2021	30-Day Follow Up Monitoring (ppmv) NA	Latitude	Longitude
NILEW723	2,000	2,000	900	--	37.458139°	-121.945951°
NILEW730	12,700	372	NA	--	37.464388°	-121.944293°
NILEW739	1,000	1,539	900	--	37.457402°	-121.943849°
NILEW745	30,000	30,000	Active	--	37.462047°	-121.945816°
NILEW747	4,030	4,030	800	--	37.461657°	-121.940511°
NILW573A	1,177	250	NA	--	37.459396°	-121.944222°
NISS17-4	17,800	4,500	900	--	37.457372°	-121.941899°
PE 24"	3,000	3,000	3,000	--	37.455532°	-121.942935°
PE Piping	4,100	1,500	1,500	--	37.456280°	-121.941159°
SAR08	20,000	20,000	2,000	--	37.458663°	-121.946412°
Sump	1,026	9,000	2,000	--	37.455631°	-121.945899°
1297	494	NA	NA	--	37.459446°	-121.945836°

Pressurized Pipe

Location	Initial Concentration	7-Day Concentrations	Latitude	Longitude
----------	--------------------------	-------------------------	----------	-----------

Third Quarter 2021

**Table 1. LMR Instantaneous Surface and Component
Emissions Monitoring Results
Newby Island Sanitary Landfill, Milpitas, California**

	(ppmv) July 12, 2021	(ppmv) July 19, 2021		
Flare Station	600	8	37.459762°	-121.950284°

No other exceedances of the 500 ppm threshold observed during the LMR/NSPS monitoring performed during the third quarter 2021.



Third Quarter 2021
 Initial Emissions Monitoring Locations Greater Than 200 ppmv
 Newby Island Landfill Milpitas, California

Attachment 4

Integrated Monitoring Results

Third Quarter 2021

Table 2. Integrated Surface Emissions Monitoring Results Newby Island Landfill, Milpitas, California

Point Name	Record Date	FID Concentration (ppm)	Comments
NIL-001	--	--	Exempted
NIL-002	--	--	Exempted
NIL-003	--	--	Exempted
NIL-004	--	--	Exempted
NIL-005	7/14/2021	6.06	
NIL-006	7/14/2021	4.64	
NIL-007	7/14/2021	6.73	
NIL-008	--	--	Exempted
NIL-009	7/14/2021	15.77	
NIL-010	--	--	Exempted
NIL-011	--	--	Exempted
NIL-012	--	--	Exempted
NIL-013	--	--	Exempted
NIL-014	7/14/2021	4.44	
NIL-015	--	--	Exempted
NIL-016	--	--	Exempted
NIL-017	7/14/2021	5.32	
NIL-018	7/14/2021	6.06	
NIL-019	--	--	Exempted
NIL-020	--	--	Exempted
NIL-021	7/14/2021	3.41	
NIL-022	--	--	Exempted
NIL-023	--	--	Exempted
NIL-024	7/14/2021	6.38	
NIL-025	7/14/2021	1.91	
NIL-026	--	--	Exempted
NIL-027	--	--	Exempted
NIL-028	7/15/2021	2.68	
NIL-029	--	--	Exempted
NIL-030	--	--	Exempted
NIL-031	--	--	Grid Not On Map
NIL-032	--	--	Exempted
NIL-033	7/14/2021	2.90	
NIL-034	7/14/2021	4.04	
NIL-035	--	--	Exempted
NIL-036	--	--	Exempted
NIL-037	7/14/2021	5.97	
NIL-038	7/14/2021	2.91	
NIL-039	7/14/2021	2.91	
NIL-040	--	--	Exempted
NIL-041	7/14/2021	2.67	
NIL-042	7/14/2021	2.67	



Third Quarter 2021

Table 2. Integrated Surface Emissions Monitoring Results Newby Island Landfill, Milpitas, California

Point Name	Record Date	FID Concentration (ppm)	Comments
NIL-043	7/14/2021	3.34	
NIL-044	--	--	Exempted
NIL-045	7/14/2021	5.28	
NIL-046	7/14/2021	7.49	
NIL-047	7/14/2021	3.64	
NIL-048	7/14/2021	3.09	
NIL-049	7/14/2021	3.55	
NIL-050	--	--	Exempted
NIL-051	7/13/2021	11.06	
NIL-052	7/13/2021	8.29	
NIL-053	7/13/2021	6.73	
NIL-054	7/13/2021	5.13	
NIL-055	7/12/2021	13.94	
NIL-056	7/12/2021	4.76	
NIL-057	7/12/2021	8.17	
NIL-058	--	--	Exempted
NIL-059	7/12/2021	25.00	Initial
NIL-059	7/22/2021	12.35	First 10-Day
NIL-060	7/12/2021	9.64	
NIL-061	7/12/2021	8.26	
NIL-062	7/12/2021	9.69	
NIL-063	7/12/2021	3.46	
NIL-064	7/12/2021	5.00	
NIL-065	7/12/2021	2.61	
NIL-066	7/15/2021	9.86	
NIL-067	--	--	Exempted
NIL-068	--	--	Exempted
NIL-069	7/13/2021	16.87	
NIL-070	7/13/2021	6.24	
NIL-071	7/13/2021	3.11	
NIL-072	7/13/2021	2.63	
NIL-073	7/13/2021	3.13	
NIL-074	7/11/2021	1.29	
NIL-075	--	--	Exempted
NIL-076	7/11/2021	3.23	
NIL-077	7/11/2021	5.21	
NIL-078	7/11/2021	8.18	
NIL-079	7/11/2021	7.55	
NIL-080	7/13/2021	15.48	
NIL-081	7/13/2021	2.58	
NIL-082	7/13/2021	2.57	
NIL-083	7/13/2021	1.74	



Third Quarter 2021

Table 2. Integrated Surface Emissions Monitoring Results Newby Island Landfill, Milpitas, California

Point Name	Record Date	FID Concentration (ppm)	Comments
NIL-084	--	--	Exempted
NIL-085	--	--	Exempted
NIL-086	7/12/2021	3.84	
NIL-087	7/12/2021	4.46	
NIL-088	7/12/2021	21.11	
NIL-089	--	--	Exempted
NIL-090	--	--	Exempted
NIL-091	7/13/2021	7.34	
NIL-092	7/13/2021	5.89	
NIL-093	7/13/2021	4.70	
NIL-094	7/12/2021	1.85	
NIL-095	7/12/2021	8.28	
NIL-096	7/12/2021	3.27	
NIL-097	7/12/2021	7.68	
NIL-098	--	--	Exempted
NIL-099	--	--	Exempted
NIL-100	--	--	Exempted
NIL-101	--	--	Exempted
NIL-102	7/12/2021	8.08	
NIL-103	7/12/2021	8.27	
NIL-104	--	--	Exempted
NIL-105	7/12/2021	6.35	
NIL-106	7/12/2021	7.18	
NIL-107	7/12/2021	13.19	
NIL-108	7/12/2021	29.02	Initial
NIL-108	7/22/2021	23.34	First 10-Day
NIL-109	--	--	Exempted
NIL-110	--	--	Exempted
NIL-111	7/13/2021	3.49	
NIL-112	7/13/2021	3.22	
NIL-113	7/13/2021	2.56	
NIL-114	7/13/2021	2.04	
NIL-115	--	--	Exempted
NIL-116	7/11/2021	9.59	
NIL-117	7/11/2021	10.94	
NIL-118	--	--	Exempted
NIL-119	--	--	Exempted
NIL-120	--	--	Exempted
NIL-121	7/13/2021	4.42	
NIL-122	7/13/2021	2.17	
NIL-123	7/13/2021	1.64	
NIL-124	7/13/2021	1.81	



Third Quarter 2021

Table 2. Integrated Surface Emissions Monitoring Results Newby Island Landfill, Milpitas, California

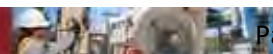
Point Name	Record Date	FID Concentration (ppm)	Comments
NIL-125	7/13/2021	1.78	
NIL-126	7/12/2021	3.74	
NIL-127	7/12/2021	3.82	
NIL-128	7/12/2021	8.65	
NIL-129	7/12/2021	13.12	
NIL-130	7/12/2021	8.88	
NIL-131	--	--	Exempted
NIL-132	--	--	Exempted
NIL-133	--	--	Exempted
NIL-134	7/13/2021	5.13	
NIL-135	7/13/2021	4.95	
NIL-136	7/13/2021	5.02	
NIL-137	--	--	Exempted
NIL-138	7/12/2021	7.34	
NIL-139	7/12/2021	20.84	
NIL-140	--	--	Exempted
NIL-141	--	--	Exempted
NIL-142	--	--	Exempted
NIL-143	--	--	Exempted
NIL-144	7/12/2021	6.43	
NIL-145	7/12/2021	6.21	
NIL-146	7/12/2021	6.46	
NIL-147	7/12/2021	3.98	
NIL-148	--	--	Exempted
NIL-149	7/12/2021	7.21	
NIL-150	7/12/2021	12.94	
NIL-151	--	--	Exempted
NIL-152	--	--	Exempted
NIL-153	--	--	Exempted
NIL-154	--	--	Exempted
NIL-155	7/13/2021	2.34	
NIL-156	7/13/2021	1.48	
NIL-157	7/13/2021	1.93	
NIL-158	--	--	Exempted
NIL-159	--	--	Exempted
NIL-160	7/12/2021	11.26	
NIL-161	--	--	Exempted
NIL-162	--	--	Exempted
NIL-163	--	--	Exempted
NIL-164	--	--	Exempted
NIL-165	7/13/2021	2.76	
NIL-166	7/13/2021	2.69	



Third Quarter 2021

Table 2. Integrated Surface Emissions Monitoring Results Newby Island Landfill, Milpitas, California

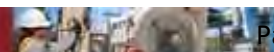
Point Name	Record Date	FID Concentration (ppm)	Comments
NIL-167	7/13/2021	2.86	
NIL-168	--	--	Exempted
NIL-169	--	--	Exempted
NIL-170	--	--	Exempted
NIL-171	7/12/2021	27.73	Initial
NIL-171	7/22/2021	38.87	First 10-Day
NIL-171	7/30/2021	17.76	Second 10-Day
NIL-172	--	--	Exempted
NIL-173	--	--	Exempted
NIL-174	--	--	Exempted
NIL-175	--	--	Exempted
NIL-176	7/13/2021	4.77	
NIL-177	7/13/2021	4.37	
NIL-178	7/13/2021	4.45	
NIL-179	--	--	Exempted
NIL-180	--	--	Exempted
NIL-181	7/12/2021	38.83	Initial
NIL-181	7/22/2021	39.67	First 10-Day
NIL-181	--	--	Active
NIL-182	7/12/2021	40.85	Initial
NIL-182	7/22/2021	60.21	First 10-Day
NIL-182	--	--	Active
NIL-183	--	--	Exempted
NIL-184	--	--	Exempted
NIL-185	--	--	Exempted
NIL-186	7/12/2021	6.16	
NIL-187	7/12/2021	5.80	
NIL-188	7/12/2021	6.69	
NIL-189	7/12/2021	4.61	
NIL-190	--	--	Exempted
NIL-191	--	--	Exempted
NIL-192	7/14/2021	50.15	Initial
NIL-192	7/23/2021	47.41	First 10-Day
NIL-192	7/30/2021	49.11	Second 10-Day
NIL-193	--	--	Exempted
NIL-194	--	--	Exempted
NIL-195	--	--	Exempted
NIL-196	7/13/2021	5.91	
NIL-197	7/13/2021	2.66	
NIL-198	7/13/2021	2.55	
NIL-199	7/11/2021	4.95	
NIL-200	7/11/2021	9.67	



Third Quarter 2021

Table 2. Integrated Surface Emissions Monitoring Results Newby Island Landfill, Milpitas, California

Point Name	Record Date	FID Concentration (ppm)	Comments
NIL-201	--	--	Exempted
NIL-202	--	--	Exempted
NIL-203	7/14/2021	33.73	Initial
NIL-203	7/22/2021	44.50	First 10-Day
NIL-203	7/30/2021	67.42	Second 10-Day
NIL-204	--	--	Exempted
NIL-205	--	--	Exempted
NIL-206	--	--	Exempted
NIL-207	7/13/2021	4.61	
NIL-208	7/13/2021	2.81	
NIL-209	7/13/2021	2.15	
NIL-210	--	--	Exempted
NIL-211	--	--	Exempted
NIL-212	7/14/2021	19.94	
NIL-213	--	--	Exempted
NIL-214	--	--	Exempted
NIL-215	--	--	Exempted
NIL-216	--	--	Exempted
NIL-217	7/14/2021	2.68	
NIL-218	7/14/2021	2.07	
NIL-219	7/12/2021	8.92	
NIL-220	--	--	Exempted
NIL-221	7/14/2021	7.69	
NIL-222	--	--	Exempted
NIL-223	--	--	Exempted
NIL-224	7/13/2021	11.60	
NIL-225	7/13/2021	9.94	
NIL-226	7/13/2021	6.87	
NIL-227	7/13/2021	5.47	
NIL-228	7/12/2021	5.99	
NIL-229	--	--	Exempted
NIL-230	7/14/2021	10.80	
NIL-231	--	--	Exempted
NIL-232	7/14/2021	13.74	
NIL-233	7/14/2021	16.54	
NIL-234	--	--	Exempted
NIL-235	7/14/2021	1.87	
NIL-236	--	--	Exempted
NIL-237	7/14/2021	2.00	
NIL-238	7/12/2021	7.44	
NIL-239	7/12/2021	7.29	
NIL-240	--	--	Exempted

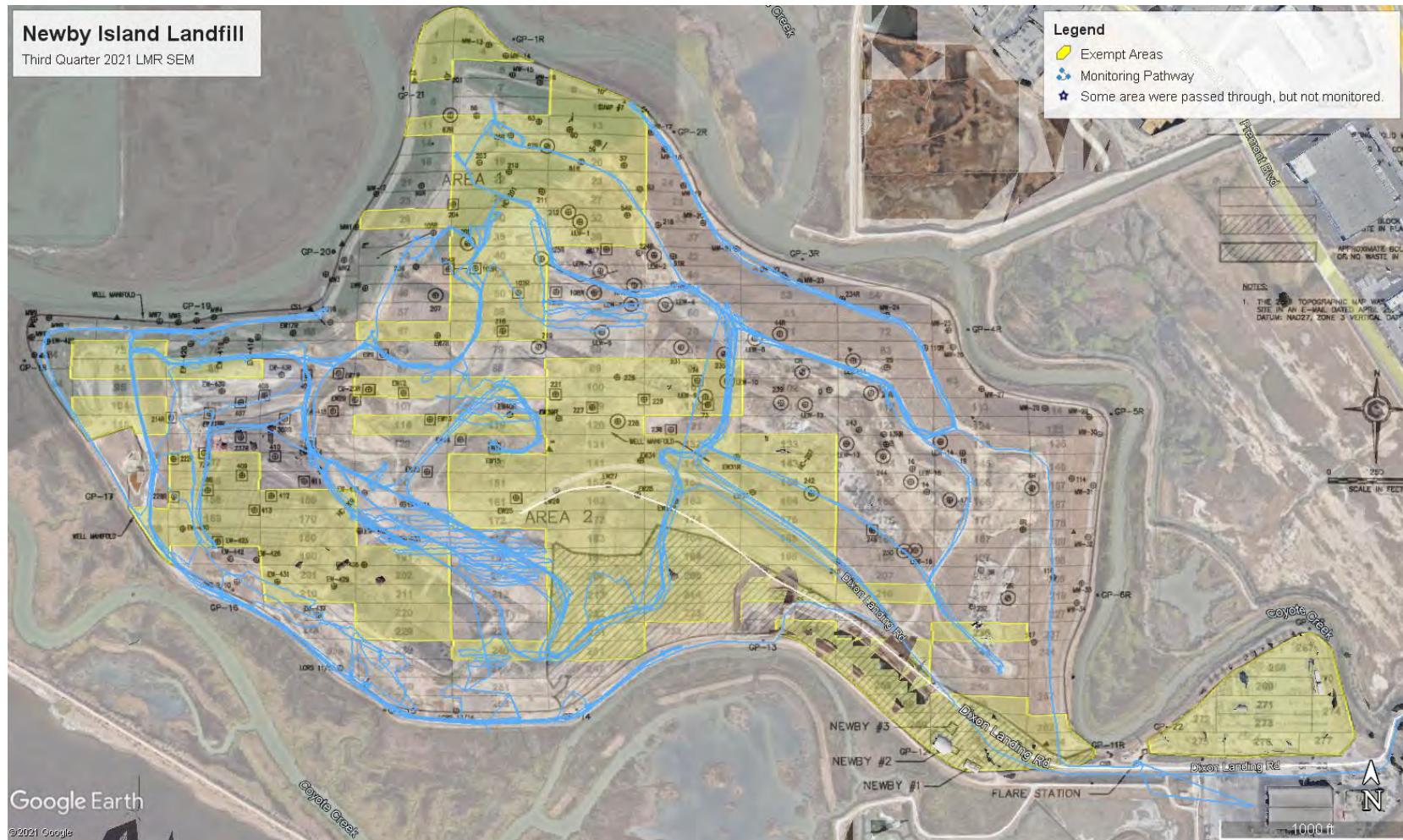


Third Quarter 2021

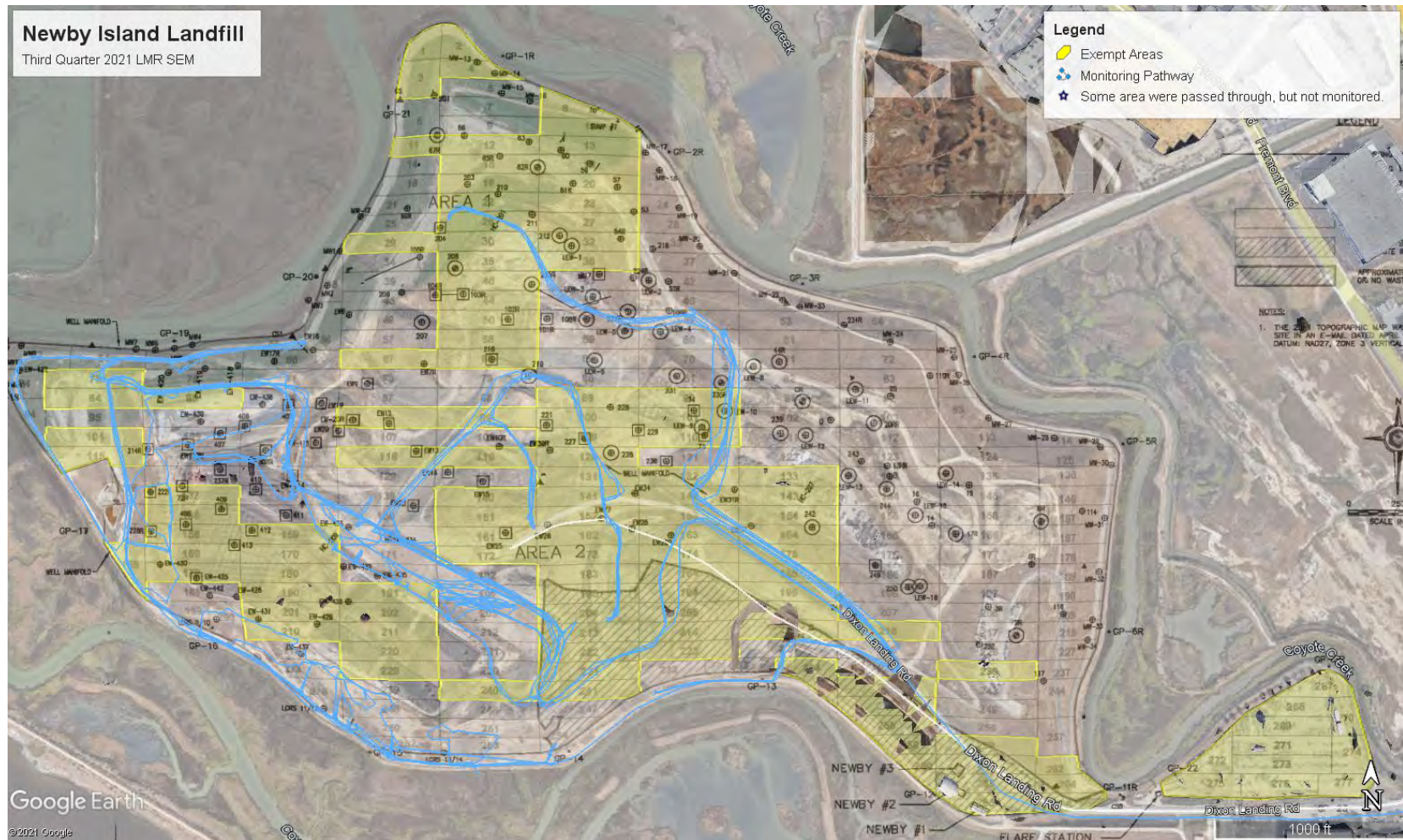
Table 2. Integrated Surface Emissions Monitoring Results Newby Island Landfill, Milpitas, California

Point Name	Record Date	FID Concentration (ppm)	Comments
NIL-241	--	--	Exempted
NIL-242	--	--	Exempted
NIL-243	7/13/2021	3.92	
NIL-244	7/13/2021	3.42	
NIL-245	7/12/2021	11.67	
NIL-246	7/14/2021	25.57	Initial
NIL-246	7/22/2021	14.96	First 10-Day
NIL-247	7/15/2021	12.33	
NIL-248	--	--	Exempted
NIL-249	7/14/2021	7.26	
NIL-250	7/14/2021	1.63	
NIL-251	7/15/2021	12.26	
NIL-252	7/12/2021	8.77	
NIL-253	7/12/2021	11.29	
NIL-254	7/12/2021	11.63	
NIL-255	--	--	Exempted
NIL-256	7/14/2021	2.54	
NIL-257	7/14/2021	2.44	
NIL-258	--	--	Exempted
NIL-259	--	--	Exempted
NIL-260	--	--	Exempted
NIL-261	--	--	Exempted
NIL-262	--	--	Exempted
NIL-263	--	--	Exempted
NIL-264	--	--	Exempted
NIL-265	--	--	Exempted
NIL-266	--	--	Exempted
NIL-267	--	--	Exempted
NIL-268	--	--	Exempted
NIL-269	--	--	Exempted
NIL-270	--	--	Exempted
NIL-271	--	--	Exempted
NIL-272	--	--	Exempted
NIL-273	--	--	Exempted
NIL-274	--	--	Exempted
NIL-275	--	--	Exempted
NIL-276	--	--	Exempted
NIL-277	--	--	Exempted





Third Quarter 2021
LMR Surface Emissions Monitoring First 10-Day Pathway
Newby Island Landfill, Milpitas, California

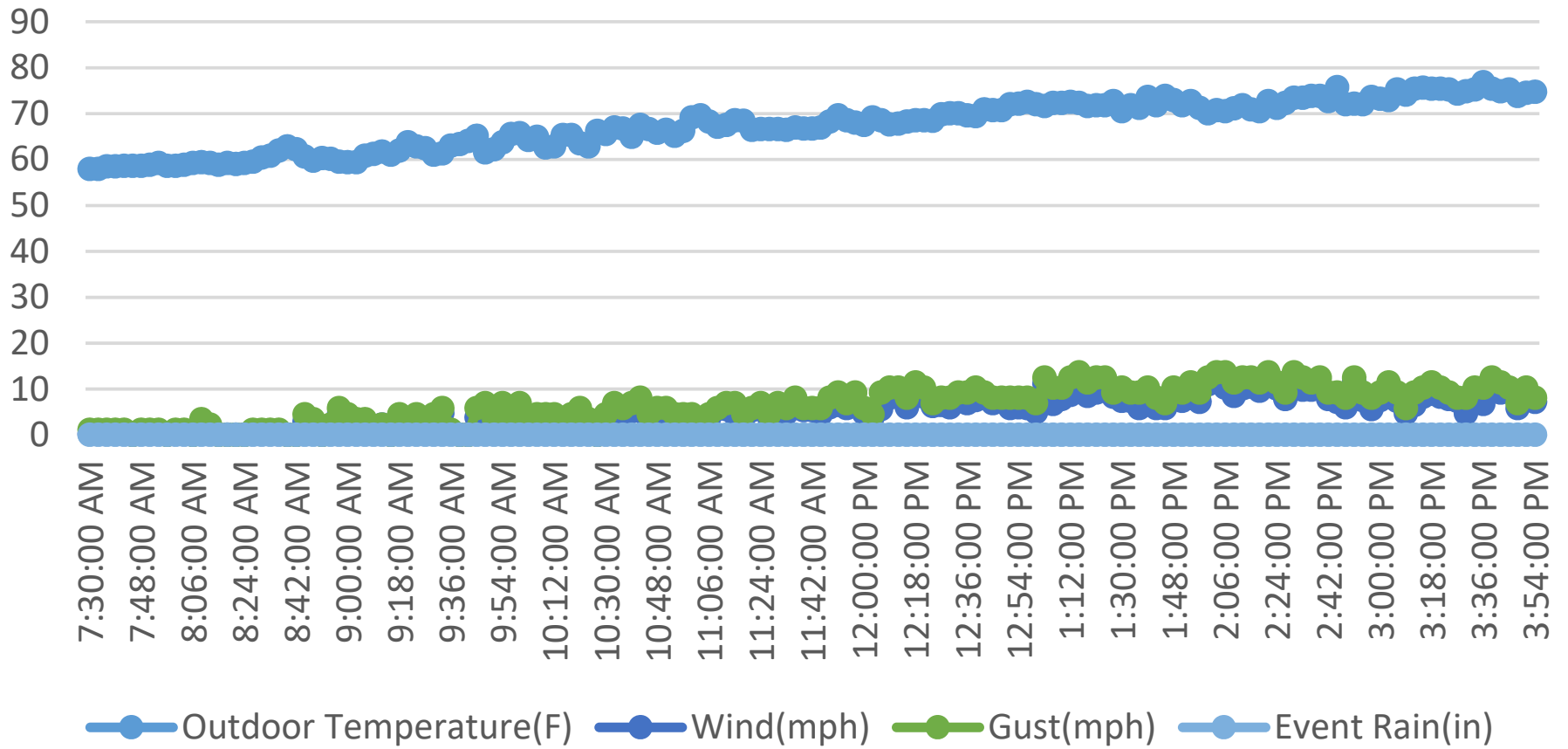


Third Quarter 2021
LMR Surface Emissions Monitoring Second 10-Day Pathway
Newby Island Landfill, Milpitas, California

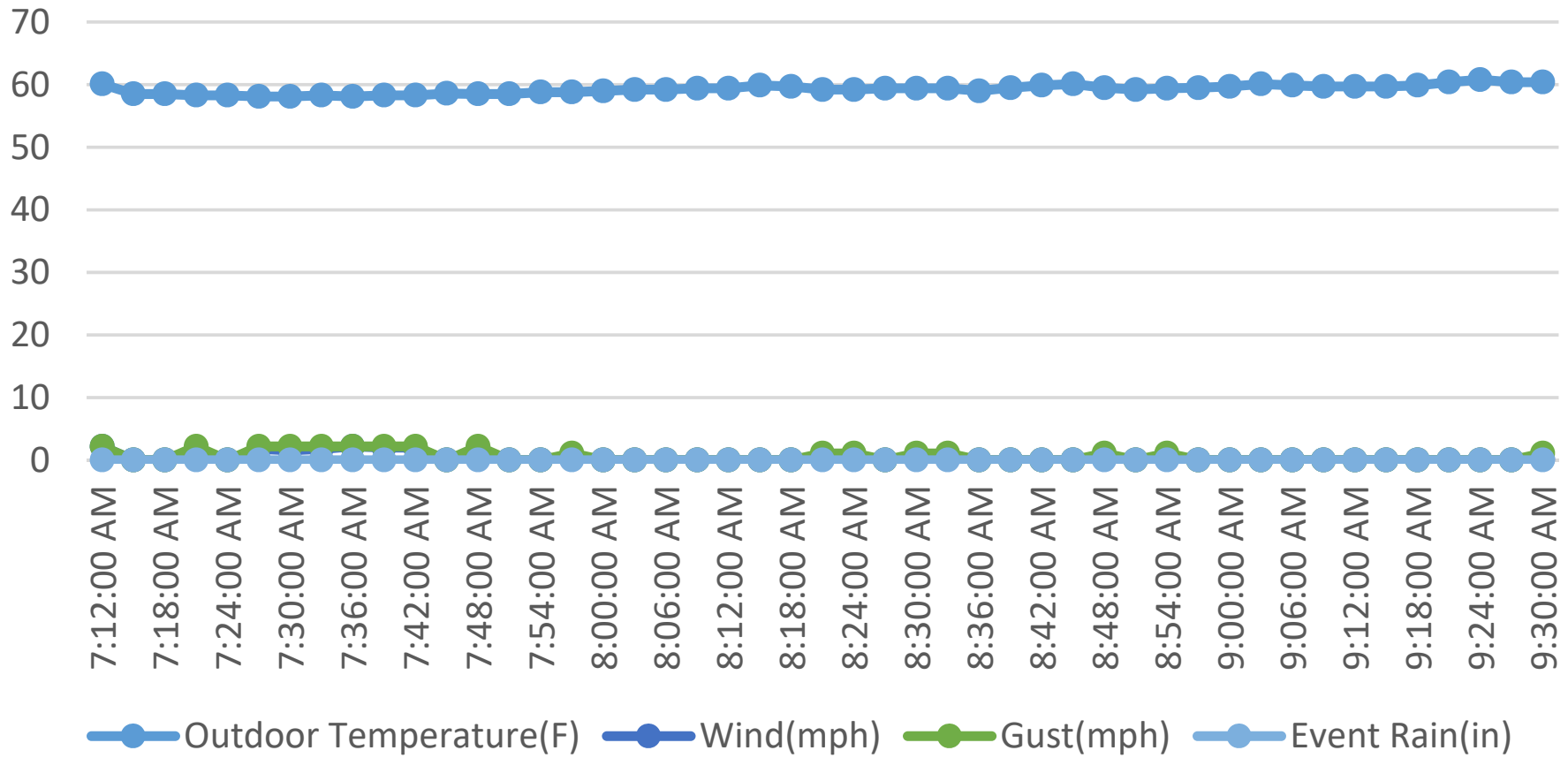
Attachment 6

Weather Data

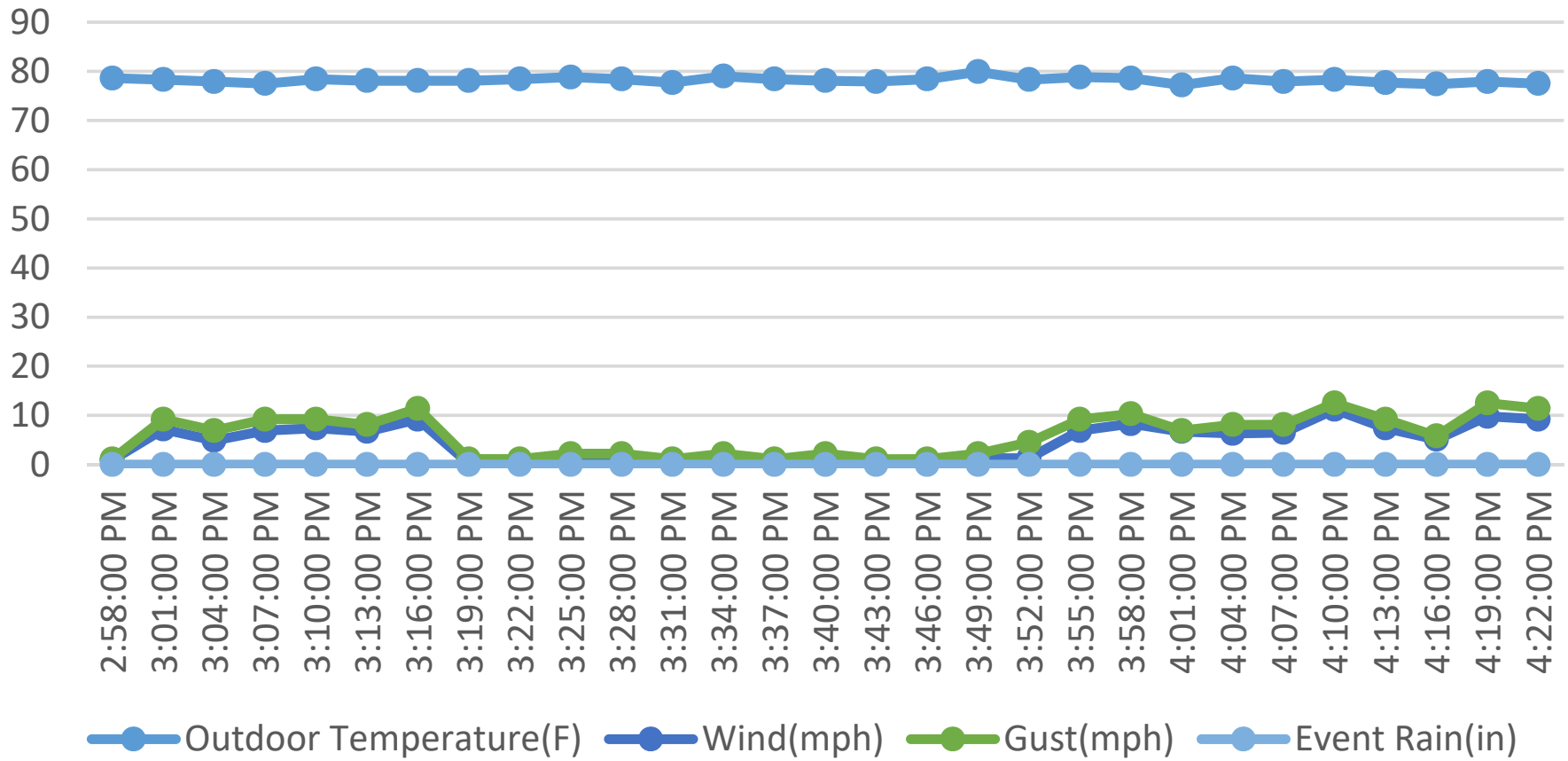
Newby Island Landfill Weather July 12, 2021



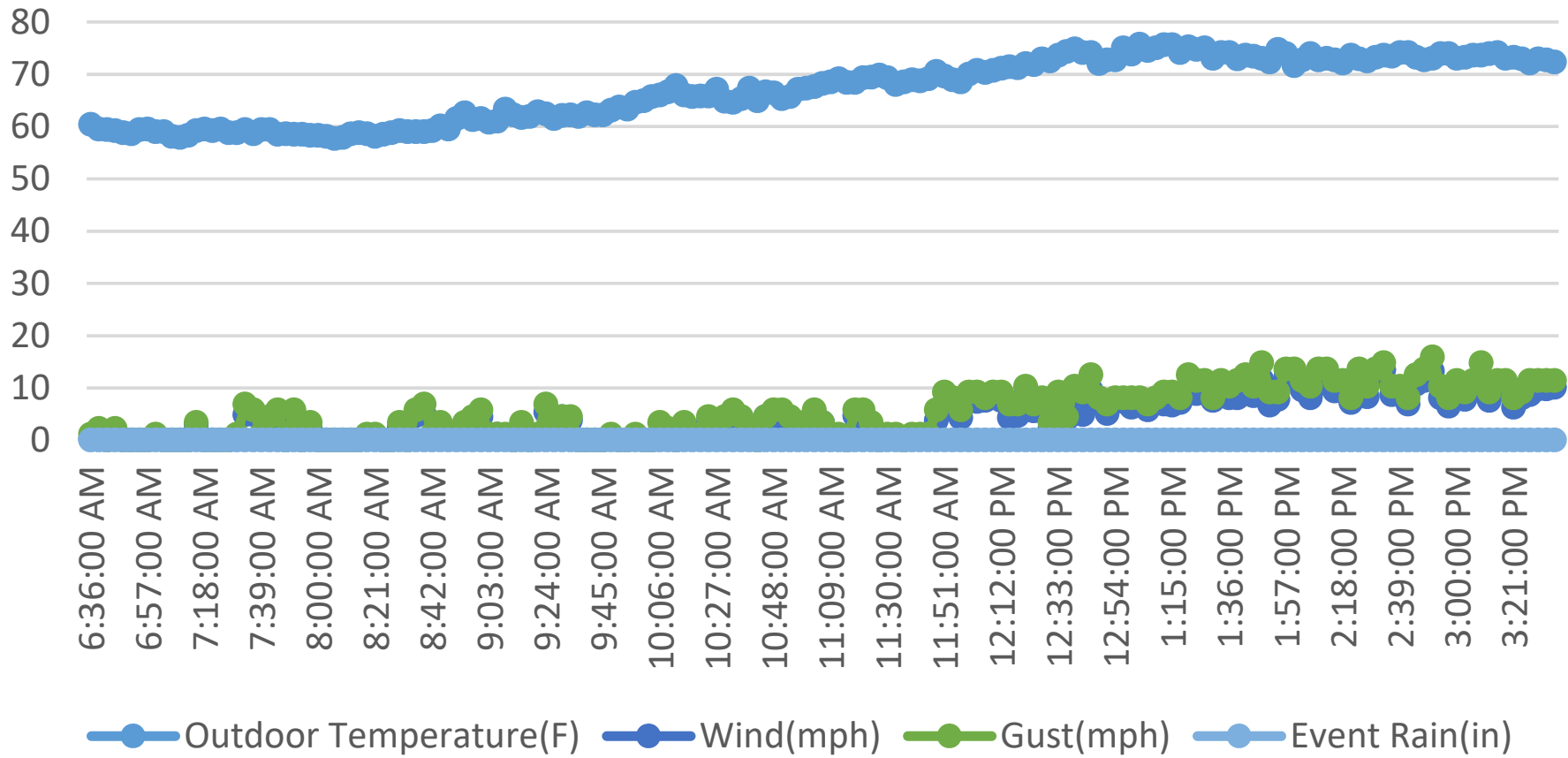
Newby Island Landfill Weather July 13, 2021



Newby Island Landfill Weather July 14, 2021



Newby Island Weather July 15, 2021



Attachment 5

Calibration Logs

Pic

SURFACE EMISSIONS MONITORING CALIBRATION AND PERTINENT DATA

Date: 7-12-21

Site Name: Newby

Inspector(s): Bryan O

Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 8 MPH

Wind Direction: WSW

Barometric Pressure: 30 "Hg

Air Temperature: 63 °F

General Weather Conditions: cloudy

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 1215

Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>.1</u>	<u>498</u>	<u>2</u>	<u>3</u>
2	<u>.0</u>	<u>500</u>	<u>0</u>	<u>3</u>
3	<u>.1</u>	<u>501</u>	<u>1</u>	<u>4</u>

Average Difference: 1

*Perform recalibration if average difference is greater than 10

Calibration Precision= Average Difference/Cal Gas Conc. X 100%

$$= 100\% - \frac{1}{500} \times 100\%$$

$$= 99.8\%$$

Span Sensitivity:

Trial 1:	Counts Observed for the Span= <u>141292</u>
	Counters Observed for the Zero= <u>8948</u>
Trial 2:	Counts Observed for the Span= <u>141565</u>
	Counters Observed for the Zero= <u>2966</u>

Trial 3:	Counts Observed for the Span= <u>141842</u>
	Counters Observed for the Zero= <u>2983</u>

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm

Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: G1

Reading: 1.2 ppm

Downwind Location Description: Flare

Reading: 1.6 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

Pre

SURFACE EMISSIONS MONITORING CALIBRATION AND PERTINENT DATA

Date: 7-12-21

Site Name: Newby

Inspector(s): Hunter Oll

Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 8 MPH

Wind Direction: WSW

Barometric Pressure: 30 "Hg

Air Temperature: 63 °F

General Weather Conditions: cloudy

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 5419

Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>.1</u>	<u>502</u>	<u>2</u>	<u>1</u>
2	<u>0</u>	<u>500</u>	<u>0</u>	
3	<u>2</u>	<u>501</u>	<u>1</u>	

Average Difference: 1

*Perform recalibration if average difference is greater than 10

Calibration Precision= Average Difference/Cal Gas Conc. X 100%

$$= 100\% - \frac{1}{500} \times 100\%$$

$$= 99.8\%$$

Span Sensitivity:

Trial 1: Counts Observed for the Span= 141572

Trial 3: Counts Observed for the Span= 141937

Counters Observed for the Zero= 3572

Counters Observed for the Zero= 3618

Trial 2: Counts Observed for the Span= 141726

Counters Observed for the Zero= 3590

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm

Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: GI

Reading: 1.2 ppm

Downwind Location Description: flare

Reading: 1.6 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

DE

SURFACE EMISSIONS MONITORING CALIBRATION AND PERTINENT DATA

Date: 7-12-21

Site Name: Newby

Inspector(s): Don G

Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 8 MPH

Wind Direction: WSW

Barometric Pressure: 30 "Hg

Air Temperature: 63 °F

General Weather Conditions: cloudy

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 1153

Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>.1</u>	<u>500</u>	<u>0</u>	<u>4</u>
2	<u>.0</u>	<u>502</u>	<u>2</u>	<u>3</u>
3	<u>.2</u>	<u>502</u>	<u>2</u>	<u>3</u>

Average Difference: 1.3

*Perform recalibration if average difference is greater than 10

Calibration Precision= Average Difference/Cal Gas Conc. X 100%

$$= 100\% - \frac{1.3}{500} \times 100\%$$

$$= 99.7\%$$

Span Sensitivity:

Trial 1:	Counts Observed for the Span= <u>162212</u>
	Counters Observed for the Zero= <u>3102</u>
Trial 2:	Counts Observed for the Span= <u>162588</u>
	Counters Observed for the Zero= <u>3127</u>

Trial 3:	Counts Observed for the Span= <u>162846</u>
	Counters Observed for the Zero= <u>3159</u>

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm

Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Gr

Reading: 1.2 ppm

Downwind Location Description: Flare

Reading: 1.5 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.



Pse

SURFACE EMISSIONS MONITORING CALIBRATION AND PERTINENT DATA

Date: 7-12-21
Inspector(s): Liam M

Site Name: Newby
Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 8 MPH Wind Direction: WSW Barometric Pressure: 30 "Hg
Air Temperature: 63 °F General Weather Conditions: cloudy

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 1223 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>0</u>	<u>500</u>	<u>0</u>	<u>3</u>
2	<u>0</u>	<u>498</u>	<u>2</u>	<u>2</u>
3	<u>0</u>	<u>501</u>	<u>1</u>	<u>2</u>

Average Difference: 1
*Perform recalibration if average difference is greater than 10

Calibration Precision= Average Difference/Cal Gas Conc. X 100%

$$= 100\% - \frac{1}{500} \times 100\%$$

$$= 99.8\%$$

Span Sensitivity:

Trial 1:	Trial 3:
Counts Observed for the Span= _____	Counts Observed for the Span= _____
Counters Observed for the Zero= <u>2706</u>	Counters Observed for the Zero= <u>2771</u>
Trial 2:	
Counts Observed for the Span= _____	
Counters Observed for the Zero= <u>2748</u>	

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: CU Reading: 1.2 ppm
Downwind Location Description: Flare Reading: 1.5 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

Dre

SURFACE EMISSIONS MONITORING CALIBRATION AND PERTINENT DATA

Date: 7-12-21
Inspector(s): Pablo Rivera

Site Name: Newby
Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 8 MPH Wind Direction: WSW Barometric Pressure: 30 "Hg
Air Temperature: 63 °F General Weather Conditions: cloudy

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 5421 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>.0</u>	<u>500</u>	<u>0</u>	<u>4</u>
2	<u>.1</u>	<u>500</u>	<u>0</u>	<u>3</u>
3	<u>.0</u>	<u>501</u>	<u>1</u>	<u>3</u>

Average Difference: .3

*Perform recalibration if average difference is greater than 10

Calibration Precision = Average Difference / Cal Gas Conc. X 100%

$$= 100\% \cdot \frac{.3}{500} \times 100\%$$

$$= 99.9\%$$

Span Sensitivity:

Trial 1:	Trial 2:
Counts Observed for the Span = <u>141208</u>	Counts Observed for the Span = <u>141966</u>
Counters Observed for the Zero = <u>2808</u>	Counters Observed for the Zero = <u>3824</u>

Trial 3:
Counts Observed for the Span = <u>141723</u>
Counters Observed for the Zero = <u>3850</u>

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Cl Reading: 1.2 ppm
Downwind Location Description: Clare Reading: 1.6 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.



Post

SURFACE EMISSIONS MONITORING CALIBRATION AND PERTINENT DATA

Date: 7-12-21 Site Name: Newby
Inspector(s): Don Gibson Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 8 MPH Wind Direction: WSW Barometric Pressure: 30 "Hg
Air Temperature: 91 °F General Weather Conditions: Sunny

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 1153 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	0	501	1	4
2	1	501	0	
3	0	500	0	

Average Difference: 1.6
*Perform recalibration if average difference is greater than 10

Calibration Precision = Average Difference / Cal Gas Conc. X 100%

$$= 100\% - \frac{1.6}{500} \times 100\%$$

$$= 99.68\%$$

Span Sensitivity:

Trial 1:	Trial 2:	Trial 3:
Counts Observed for the Span = <u>163839</u>	Counts Observed for the Span = <u>163347</u>	Counts Observed for the Span = <u>164121</u>
Counters Observed for the Zero = <u>3148</u>	Counters Observed for the Zero = <u>3154</u>	Counters Observed for the Zero = <u>3137</u>

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Grid 1 Reading: 1.2 ppm
Downwind Location Description: Flare Reading: 1.5 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

Post

SURFACE EMISSIONS MONITORING CALIBRATION AND PERTINENT DATA

Date: 1-12-21 Site Name: Newby
Inspector(s): Bryan D Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 8 MPH Wind Direction: WSW Barometric Pressure: 30 "Hg
Air Temperature: 91 °F General Weather Conditions: sunny

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 1215 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>.1</u>	<u>500</u>	<u>0</u>	<u>3</u>
2	<u>.0</u>	<u>502</u>	<u>2</u>	<u>4</u>
3	<u>.1</u>	<u>500</u>	<u>0</u>	<u>4</u>

Average Difference: .6
*Perform recalibration if average difference is greater than 10

Calibration Precision= Average Difference/Cal Gas Conc. X 100%

$$= 100\% - \frac{.6}{500} \times 100\%$$

$$= 99.8\%$$

Span Sensitivity:

Trial 1: Counts Observed for the Span= <u>142636</u> Counters Observed for the Zero= <u>2875</u>	Trial 3: Counts Observed for the Span= <u>143582</u> Counters Observed for the Zero= <u>2812</u>
Trial 2: Counts Observed for the Span= <u>142314</u> Counters Observed for the Zero= <u>2842</u>	

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Grid 1 Reading: 1.2 ppm
Downwind Location Description: Flare Reading: 1.6 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

Post

SURFACE EMISSIONS MONITORING CALIBRATION AND PERTINENT DATA

Date: 7-12-21 Site Name: Newby
Inspector(s): Hunter ott Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 8 MPH Wind Direction: WSW Barometric Pressure: 30 "Hg
Air Temperature: 91 °F General Weather Conditions: Sunny

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 5419 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>.0</u>	<u>500</u>	<u>0</u>	<u>1 min</u>
2	<u>.2</u>	<u>502</u>	<u>2</u>	
3	<u>.1</u>	<u>500</u>	<u>0</u>	

Average Difference: *Perform recalibration if average difference is greater than 10

Calibration Precision= Average Difference/Cal Gas Conc. X 100%

= 100% - / 500 x 100%
= %

Span Sensitivity:

Trial 1: Counts Observed for the Span= <u>142924</u> Counters Observed for the Zero= <u>3563</u>	Trial 3: Counts Observed for the Span= <u>142781</u> Counters Observed for the Zero= <u>3573</u>
Trial 2: Counts Observed for the Span= <u>142110</u> Counters Observed for the Zero= <u>3543</u>	

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Grid 1 Reading: 1.2 ppm
Downwind Location Description: Flare Reading: 1.5 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

Post

SURFACE EMISSIONS MONITORING CALIBRATION AND PERTINENT DATA

Date: 7-12-21
Inspector(s): Cram McGinn

Site Name: Newby
Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 8 MPH Wind Direction: WSW Barometric Pressure: 30 "Hg
Air Temperature: 91 °F General Weather Conditions: sunny

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 1223 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>.6</u>	<u>500</u>	<u>0</u>	<u>4</u>
2	<u>.0</u>	<u>502</u>	<u>2</u>	<u>3</u>
3	<u>.2</u>	<u>502</u>	<u>2</u>	<u>2</u>

Average Difference: 1.3
*Perform recalibration if average difference is greater than 10

Calibration Precision= Average Difference/Cal Gas Conc. X 100%

$$= 100\% - \frac{1.3}{500} \times 100\%$$

$$= 99.7\%$$

Span Sensitivity:

Trial 1:	Counts Observed for the Span= <u>128722</u>
	Counters Observed for the Zero= <u>2741</u>
Trial 2:	Counts Observed for the Span= <u>128421</u>
	Counters Observed for the Zero= <u>2783</u>

Trial 3:	Counts Observed for the Span= <u>129212</u>
	Counters Observed for the Zero= <u>2748</u>

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Grid #1 Reading: 1.2 ppm
Downwind Location Description: Flare Reading: 1.6 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

SURFACE EMISSIONS MONITORING CALIBRATION AND PERTINENT DATA

Date: 7-12-21 Site Name: Newby
 Inspector(s): Pablo Rivera Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 8 MPH Wind Direction: WSW Barometric Pressure: 30 "Hg
 Air Temperature: 91 °F General Weather Conditions: Sunny

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 5421 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>1</u>	<u>501</u>	<u>1</u>	<u>3</u>
2	<u>1</u>	<u>500</u>	<u>1</u>	<u>3</u>
3	<u>0</u>	<u>502</u>	<u>2</u>	<u>2</u>

Average Difference: 1
*Perform recalibration if average difference is greater than 10

Calibration Precision= Average Difference/Cal Gas Conc. X 100%

$$= 100\% - \frac{1}{500} \times 100\% = 99.8\%$$

Span Sensitivity:

Trial 1: Counts Observed for the Span= <u>142839</u> Counters Observed for the Zero= <u>3824</u>	Trial 3: Counts Observed for the Span= <u>143911</u> Counters Observed for the Zero= <u>3812</u>
Trial 2: Counts Observed for the Span= <u>143651</u> Counters Observed for the Zero= <u>3863</u>	

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Grid 1 Reading: 1.3 ppm
 Downwind Location Description: Flare Reading: 1.4 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

PCE

SURFACE EMISSIONS MONITORING CALIBRATION AND PERTINENT DATA

Date: 2-13-21 Site Name: Newby
 Inspector(s): Bryan O Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 6 MPH Wind Direction: SW Barometric Pressure: 30 "Hg
 Air Temperature: 61 °F General Weather Conditions: clear

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 1215 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>0</u>	<u>500</u>	<u>0</u>	<u>4</u>
2	<u>0</u>	<u>501</u>	<u>0</u>	<u>3</u>
3	<u>2</u>	<u>500</u>	<u>0</u>	<u>3</u>

Average Difference: 3
*Perform recalibration if average difference is greater than 10

Calibration Precision = Average Difference / Cal Gas Conc. X 100%
 = 100% - 3 / 500 x 100%
 = 99.9 %

Span Sensitivity:

Trial 1: Counts Observed for the Span= <u>126500</u> Counters Observed for the Zero= <u>3734</u>	Trial 3: Counts Observed for the Span= <u>126926</u> Counters Observed for the Zero= <u>3782</u>
Trial 2: Counts Observed for the Span= <u>126922</u> Counters Observed for the Zero= <u>3752</u>	

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: 2-1 Reading: 13 ppm
 Downwind Location Description: Flare Reading: 15 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

Pre

SURFACE EMISSIONS MONITORING CALIBRATION AND PERTINENT DATA

Date: 2-13-21

Site Name: Newby

Inspector(s): Don C

Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 6 MPH

Wind Direction: SW

Barometric Pressure: 30 "Hg

Air Temperature: 61 °F

General Weather Conditions: clear

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 5421

Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>0</u>	<u>498</u>	<u>2</u>	<u>3</u>
2	<u>0</u>	<u>501</u>	<u>1</u>	<u>4</u>
3	<u>0</u>	<u>501</u>	<u>1</u>	<u>4</u>

Average Difference: 1.3

*Perform recalibration if average difference is greater than 10

Calibration Precision= Average Difference/Cal Gas Conc. X 100%

$$= 100\% \cdot \frac{1.3}{500} \times 100\%$$

$$= 99.7\%$$

Span Sensitivity:

Trial 1: Counts Observed for the Span= 154804

Counters Observed for the Zero= 3913

Trial 3: Counts Observed for the Span= 154710

Counters Observed for the Zero= 3953

Trial 2: Counts Observed for the Span= 154927

Counters Observed for the Zero= 3929

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm

Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: C11

Reading: 12 ppm

Downwind Location Description: Flare

Reading: 1.5 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.



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SURFACE EMISSIONS MONITORING CALIBRATION AND PERTINENT DATA

Date: 2-13-21
Inspector(s): Liam MA

Site Name: Newby
Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 6 MPH Wind Direction: SW Barometric Pressure: 30 "Hg
Air Temperature: 61 °F General Weather Conditions: clear

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 1223 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	0	500	0	3
2	.1	501	1	5
3	.0	501	1	4

Average Difference: .6

*Perform recalibration if average difference is greater than 10

Calibration Precision = Average Difference / Cal Gas Conc. X 100%

$$= 100\% \cdot \frac{.6}{500} \times 100\% = 99.8\%$$

Span Sensitivity:

Trial 1:	Trial 3:
Counts Observed for the Span = <u>121168</u>	Counts Observed for the Span = <u>122384</u>
Counters Observed for the Zero = <u>3332</u>	Counters Observed for the Zero = <u>3105</u>
Trial 2:	
Counts Observed for the Span = <u>123287</u>	
Counters Observed for the Zero = <u>2922</u>	

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: G1 Reading: 1.2 ppm
Downwind Location Description: Flare Reading: 1.6 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

Pre

SURFACE EMISSIONS MONITORING CALIBRATION AND PERTINENT DATA

Date: 7-13-21
Inspector(s): Hunter O

Site Name: Newby
Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 61 MPH Wind Direction: SW Barometric Pressure: 30 "Hg
Air Temperature: 6 °F General Weather Conditions: Clear

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 5420 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>0</u>	<u>500</u>	<u>0</u>	<u>4</u>
2	<u>0</u>	<u>500</u>	<u>0</u>	<u>2</u>
3	<u>0</u>	<u>500</u>	<u>0</u>	<u>3</u>

Average Difference: 0

*Perform recalibration if average difference is greater than 10

Calibration Precision= Average Difference/Cal Gas Conc. X 100%

$$= 100\% - \frac{0}{500} \times 100\%$$

$$= 100\% \text{ }$$

Span Sensitivity:

Trial 1:	Counts Observed for the Span= <u>139860</u>
	Counters Observed for the Zero= <u>5452</u>
Trial 2:	Counts Observed for the Span= <u>146900</u> / <u>139628</u>
	Counters Observed for the Zero= <u>3622</u>

Trial 3:	Counts Observed for the Span= <u>134416</u>
	Counters Observed for the Zero= <u>6980</u>

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: C-11 Reading: 1.5 ppm
Downwind Location Description: Flare Reading: 1.7 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

Post

SURFACE EMISSIONS MONITORING CALIBRATION AND PERTINENT DATA

Date: 7-13-21

Site Name: Newby

Inspector(s): Bryan O

Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Spe... 9 MPH

Wind Direction: SW

Barometric Pressure: 30 "Hg

Air Temperature: 76 °F

General Weather Conditions: Sunny

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 1215

Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>0</u>	<u>500</u>	<u>0</u>	<u>4</u>
2	<u>2</u>	<u>498</u>	<u>2</u>	<u>3</u>
3	<u>1</u>	<u>498</u>	<u>2</u>	<u>3</u>

Average Difference: 1.3

*Perform recalibration if average difference is greater than 10

Calibration Precision= Average Difference/Cal Gas Conc. X 100%

$$= 100\% - \frac{1.3}{500} \times 100\% = 99.7\%$$

Span Sensitivity:

Trial 1:
 Counts Observed for the Span= 126382
 Counters Observed for the Zero= 3724

Trial 3:
 Counts Observed for the Span= 126785
 Counters Observed for the Zero= 3797

Trial 2:
 Counts Observed for the Span= 126529
 Counters Observed for the Zero= 3759

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm

Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: CU Reading: 1.2 ppm

Downwind Location Description: Flare Reading: 1.6 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

Post

SURFACE EMISSIONS MONITORING CALIBRATION AND PERTINENT DATA

Date: 7-13-21 Site Name: Newslay
Inspector(s): Don G Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 9 MPH Wind Direction: SW Barometric Pressure: 30 "Hg
Air Temperature: 76 °F General Weather Conditions: Sunny

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 5421 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>1</u>	<u>502</u>	<u>2</u>	<u>3</u>
2	<u>0</u>	<u>502</u>	<u>2</u>	<u>3</u>
3	<u>2</u>	<u>500</u>	<u>0</u>	<u>4</u>

Average Difference: 1.3

*Perform recalibration if average difference is greater than 10

Calibration Precision= Average Difference/Cal Gas Conc. X 100%

$$= 100\% - \frac{1.3}{500} \times 100\%$$

$$= 99.7\%$$

Span Sensitivity:

Trial 1:	Trial 3:
Counts Observed for the Span= <u>153296</u>	Counts Observed for the Span= <u>153622</u>
Counters Observed for the Zero= <u>3947</u>	Counters Observed for the Zero= <u>3984</u>
Trial 2:	
Counts Observed for the Span= <u>153527</u>	
Counters Observed for the Zero= <u>3968</u>	

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: GH Reading: 1.2 ppm
Downwind Location Description: Place Reading: 1.5 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

Post

SURFACE EMISSIONS MONITORING CALIBRATION AND PERTINENT DATA

Date: 7-13-21 Site Name: Clewley
Inspector(s): Hunter ott Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 9 MPH Wind Direction: SW Barometric Pressure: 30 "Hg
Air Temperature: 76 °F General Weather Conditions: sunny

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 5420 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>1</u>	<u>500</u>	<u>0</u>	<u>3</u>
2	<u>2</u>	<u>502</u>	<u>2</u>	<u>3</u>
3	<u>0</u>	<u>502</u>	<u>2</u>	<u>4</u>

Average Difference: 1.3
*Perform recalibration if average difference is greater than 10

Calibration Precision = Average Difference / Cal Gas Conc. X 100%

$$= 100\% - \frac{1.3}{500} \times 100\%$$

$$= 99.7\%$$

Span Sensitivity:

Trial 1:	Trial 2:	Trial 3:
Counts Observed for the Span = <u>138256</u>	Counts Observed for the Span = <u>138507</u>	Counts Observed for the Span = <u>138922</u>
Counters Observed for the Zero = <u>3255</u>	Counters Observed for the Zero = <u>3285</u>	Counters Observed for the Zero = <u>3285</u>

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: cul Reading: 1.2 ppm
Downwind Location Description: Flare Reading: 1.5 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

Post

SURFACE EMISSIONS MONITORING CALIBRATION AND PERTINENT DATA

Date: 7-13-21
Inspector(s): Liam M

Site Name: Newby
Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 9 MPH Wind Direction: SW Barometric Pressure: 30 "Hg
Air Temperature: 76 °F General Weather Conditions: Sunny

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 1213 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>0</u>	<u>502</u>	<u>2</u>	<u>3</u>
2	<u>0</u>	<u>500</u>	<u>0</u>	<u>2</u>
3	<u>0</u>	<u>500</u>	<u>0</u>	<u>4</u>

Average Difference: 0.6

*Perform recalibration if average difference is greater than 10

Calibration Precision= Average Difference/Cal Gas Conc. X 100%

$$= 100\% - \frac{0.6}{500} \times 100\%$$

$$= 99.8\%$$

Span Sensitivity:

Trial 1:	Counts Observed for the Span= <u>120275</u>
	Counters Observed for the Zero= <u>3046</u>
Trial 2:	Counts Observed for the Span= <u>120588</u>
	Counters Observed for the Zero= <u>3075</u>

Trial 3:	Counts Observed for the Span= <u>120843</u>
	Counters Observed for the Zero= <u>3109</u>

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: G1 Reading: 1.2 ppm
Downwind Location Description: Flare Reading: 1.6 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

Pre

SURFACE EMISSIONS MONITORING CALIBRATION AND PERTINENT DATA

Date: 7-14-21 Site Name: Newby
Inspector(s): Don Gibson Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 6 MPH Wind Direction: SE Barometric Pressure: 30 "Hg
Air Temperature: 61 °F General Weather Conditions: clear

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 5421 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	0	492	2	2
2	1	502	2	4
3	1	500	0	4

Average Difference: 1
*Perform recalibration if average difference is greater than 10

Calibration Precision= Average Difference/Cal Gas Conc. X 100%

$$= 100\% - \frac{1}{500} \times 100\%$$

$$= 99.8\%$$

Span Sensitivity:

Trial 1:	Trial 3:
Counts Observed for the Span= <u>111496</u>	Counts Observed for the Span= <u>111969</u>
Counters Observed for the Zero= <u>4675</u>	Counters Observed for the Zero= <u>4718</u>
Trial 2:	
Counts Observed for the Span= <u>111732</u>	
Counters Observed for the Zero= <u>4692</u>	

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: C163 Reading: 6.2 ppm
Downwind Location Description: Flare Reading: 1.6 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

SURFACE EMISSIONS MONITORING CALIBRATION AND PERTINENT DATA

Date: 7-14-21 Site Name: Newby
 Inspector(s): Hunterott Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 6 MPH Wind Direction: SE Barometric Pressure: 30 "Hg
 Air Temperature: 61 °F General Weather Conditions: clear

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 5420 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>0</u>	<u>500</u>	<u>0</u>	<u>4</u>
2	<u>.1</u>	<u>502</u>	<u>2</u>	<u>3</u>
3	<u>.1</u>	<u>500</u>	<u>0</u>	<u>3</u>

Average Difference: .6

*Perform recalibration if average difference is greater than 10

Calibration Precision= Average Difference/Cal Gas Conc. X 100%

$$= 100\% \cdot \frac{.6}{500} / 500 \times 100\% = 99.8\%$$

Span Sensitivity:

Trial 1:	Trial 3:
Counts Observed for the Span= <u>127226</u>	Counts Observed for the Span= <u>127688</u>
Counters Observed for the Zero= <u>3502</u>	Counters Observed for the Zero= <u>3559</u>
Trial 2:	
Counts Observed for the Span= <u>127488</u>	
Counters Observed for the Zero= <u>3529</u>	

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: G-63 Reading: 1.3 ppm
 Downwind Location Description: Flare Reading: 1.6 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

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SURFACE EMISSIONS MONITORING CALIBRATION AND PERTINENT DATA

Date: 7-14-21

Site Name: Newby

Inspector(s): Liam McGinn

Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 6 MPH

Wind Direction: SE

Barometric Pressure: 30 "Hg

Air Temperature: 61 °F

General Weather Conditions: Clear

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 1223

Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>.1</u>	<u>500</u>	<u>0</u>	<u>3</u>
2	<u>0</u>	<u>501</u>	<u>1</u>	<u>2</u>
3	<u>.1</u>	<u>501</u>	<u>1</u>	<u>2</u>

Average Difference: .6

*Perform recalibration if average difference is greater than 10

Calibration Precision= Average Difference/Cal Gas Conc. X 100%

$$= 100\% \cdot \frac{.6}{500} \times 100\%$$

$$= 99.8\%$$

Span Sensitivity:

Trial 1:	Counts Observed for the Span= <u>123960</u>
	Counters Observed for the Zero= <u>2618</u>
Trial 2:	Counts Observed for the Span= <u>124189</u>
	Counters Observed for the Zero= <u>2639</u>

Trial 3:	Counts Observed for the Span= <u>124503</u>
	Counters Observed for the Zero= <u>2662</u>

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm

Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: 1163

Reading: 1.2 ppm

Downwind Location Description: Elave

Reading: 1.6 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

Pre

SURFACE EMISSIONS MONITORING CALIBRATION AND PERTINENT DATA

Date: 7-14-21 Site Name: Newby
Inspector(s): Bryan Ochoa Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 6 MPH Wind Direction: SE Barometric Pressure: 30 "Hg
Air Temperature: 61 °F General Weather Conditions: clear

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 1215 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>.1</u>	<u>500</u>	<u>0</u>	<u>3</u>
2	<u>.0</u>	<u>502</u>	<u>2</u>	<u>4</u>
3	<u>.0</u>	<u>500</u>	<u>0</u>	<u>4</u>

Average Difference: .6
*Perform recalibration if average difference is greater than 10

Calibration Precision= Average Difference/Cal Gas Conc. X 100%

$$= 100\% - \frac{.6}{500} \times 100\%$$

$$= 99.8 \%$$

Span Sensitivity:

Trial 1:	Trial 3:
Counts Observed for the Span= <u>125132</u>	Counts Observed for the Span= <u>125492</u>
Counters Observed for the Zero= <u>2833</u>	Counters Observed for the Zero= <u>2869</u>
Trial 2:	
Counts Observed for the Span= <u>125381</u>	
Counters Observed for the Zero= <u>2801</u>	

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: GC3 Reading: 1.3 ppm
Downwind Location Description: Flare Reading: 1.5 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

POST

SURFACE EMISSIONS MONITORING CALIBRATION AND PERTINENT DATA

Date: 7-14-21 Site Name: Newby
Inspector(s): Don G Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 10 MPH Wind Direction: NW Barometric Pressure: 30 "Hg
Air Temperature: 73 °F General Weather Conditions: 29.89

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 5421 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>1</u>	<u>500</u>	<u>0</u>	<u>4</u>
2	<u>.2</u>	<u>502</u>	<u>2</u>	<u>2</u>
3	<u>0</u>	<u>502</u>	<u>2</u>	<u>3</u>

Average Difference: 1.3

*Perform recalibration if average difference is greater than 10

Calibration Precision= Average Difference/Cal Gas Conc. X 100%

$$= 100\% - \frac{1.3}{500} \times 100\%$$

$$= 99.7\%$$

Span Sensitivity:

Trial 1:	Trial 3:
Counts Observed for the Span= <u>110138</u>	Counts Observed for the Span= <u>110627</u>
Counters Observed for the Zero= <u>4894</u>	Counters Observed for the Zero= <u>4758</u>
Trial 2:	
Counts Observed for the Span= <u>110396</u>	
Counters Observed for the Zero= <u>4730</u>	

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: 938 Reading: 1.2 ppm
Downwind Location Description: Flare Reading: 1.6 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

Post

SURFACE EMISSIONS MONITORING CALIBRATION AND PERTINENT DATA

Date: 7-14-21 Site Name: Mewby
Inspector(s): Hunter O Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 10 MPH Wind Direction: NW Barometric Pressure: 29.89 "Hg
Air Temperature: 73 °F General Weather Conditions: Sunny

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 5420 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>.1</u>	<u>502</u>	<u>2</u>	<u>2</u>
2	<u>.0</u>	<u>500</u>	<u>0</u>	<u>3</u>
3	<u>.2</u>	<u>506</u>	<u>6</u>	<u>4</u>

Average Difference: .6
*Perform recalibration if average difference is greater than 10

Calibration Precision= Average Difference/Cal Gas Conc. X 100%

$$= 100\% \cdot \frac{.6}{500} \times 100\%$$

$$= 99.8\%$$

Span Sensitivity:

Trial 1:	Trial 3:
Counts Observed for the Span= <u>126099</u>	Counts Observed for the Span= <u>129295</u>
Counters Observed for the Zero= <u>3514</u>	Counters Observed for the Zero= <u>3582</u>
Trial 2:	
Counts Observed for the Span= <u>126482</u>	
Counters Observed for the Zero= <u>3549</u>	

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: C786 Reading: 1.2 ppm
Downwind Location Description: Flare Reading: 1.6 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

Post

SURFACE EMISSIONS MONITORING CALIBRATION AND PERTINENT DATA

Date: 7-14-21
Inspector(s): Liam M

Site Name: Newby
Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 10 MPH Wind Direction: NW Barometric Pressure: 29.98 "Hg
Air Temperature: 73 °F General Weather Conditions: Sunny

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 1223 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>1</u>	<u>501</u>	<u>1</u>	<u>4</u>
2	<u>0</u>	<u>500</u>	<u>0</u>	<u>3</u>
3	<u>2</u>	<u>502</u>	<u>2</u>	<u>3</u>

Average Difference:
 *Perform recalibration if average difference is greater than 10

Calibration Precision= Average Difference/Cal Gas Conc. X 100%

= 100% - /500 x 100%

= %

Span Sensitivity:

Trial 1:	Trial 3:
Counts Observed for the Span= <u>22063</u>	Counts Observed for the Span= <u>22439</u>
Counters Observed for the Zero= <u>2635</u>	Counters Observed for the Zero= <u>2690</u>
Trial 2:	
Counts Observed for the Span= <u>22275</u>	
Counters Observed for the Zero= <u>2672</u>	

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: 67388 Flare Reading: 1.3 ppm
Downwind Location Description: Flare Reading: 1.5 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

Post

SURFACE EMISSIONS MONITORING CALIBRATION AND PERTINENT DATA

Date: 7-14-21 Site Name: Newby
Inspector(s): Bryano Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 10 MPH Wind Direction: NW Barometric Pressure: 29.98 "Hg
Air Temperature: 23 °F General Weather Conditions: Sunny

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 1215 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>.0</u>	<u>500</u>	<u>0</u>	<u>4</u>
2	<u>.2</u>	<u>502</u>	<u>2</u>	<u>2</u>
3	<u>.1</u>	<u>501</u>	<u>1</u>	<u>2</u>

Average Difference: 1
*Perform recalibration if average difference is greater than 10

Calibration Precision= Average Difference/Cal Gas Conc. X 100%

$$= 100\% - \frac{1}{500} \times 100\%$$

$$= 99.8\%$$

Span Sensitivity:

Trial 1:	Trial 3:
Counts Observed for the Span= <u>124090</u>	Counts Observed for the Span= <u>124409</u>
Counters Observed for the Zero= <u>2867</u>	Counters Observed for the Zero= <u>2885</u>
Trial 2:	
Counts Observed for the Span= <u>124285</u>	
Counters Observed for the Zero= <u>2899</u>	

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: M38 Reading: 1.3 ppm
Downwind Location Description: House Reading: 1.6 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

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SURFACE EMISSIONS MONITORING CALIBRATION AND PERTINENT DATA

Date: 7-15-21

Site Name: Newby

Inspector(s): Cody L

Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 6 MPH

Wind Direction: SSE

Barometric Pressure: 29.98 "Hg

Air Temperature: 57 °F

General Weather Conditions: cloudy

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 5415

Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>0</u>	<u>499</u>	<u>1</u>	<u>3</u>
2	<u>1</u>	<u>501</u>	<u>1</u>	<u>4</u>
3	<u>0</u>	<u>501</u>	<u>1</u>	<u>3</u>

Average Difference: 1
*Perform recalibration if average difference is greater than 10

Calibration Precision= Average Difference/Cal Gas Conc. X 100%

$$= 100\% - \frac{1}{500} \times 100\% = 99.8\%$$

Span Sensitivity:

Trial 1:	Counts Observed for the Span= <u>28696</u>
	Counters Observed for the Zero= <u>4538</u>
Trial 2:	Counts Observed for the Span= <u>128785</u>
	Counters Observed for the Zero= <u>4562</u>

Trial 3:	Counts Observed for the Span= <u>128993</u>
	Counters Observed for the Zero= <u>4588</u>

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm

Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: C-1

Reading: 1.2 ppm

Downwind Location Description: Flare

Reading: 1.6 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

Pre

SURFACE EMISSIONS MONITORING CALIBRATION AND PERTINENT DATA

Date: 7-15-21

Site Name: Newby

Inspector(s): Bryan O

Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 6 MPH

Wind Direction: SSE

Barometric Pressure: 29.98 "Hg

Air Temperature: 57 °F

General Weather Conditions: cloudy

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 1215

Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>0</u>	<u>499</u>	<u>1</u>	<u>4</u>
2	<u>.1</u>	<u>502</u>	<u>2</u>	<u>3</u>
3	<u>.0</u>	<u>499</u>	<u>1</u>	<u>4</u>

Average Difference: 1.3

*Perform recalibration if average difference is greater than 10

Calibration Precision= Average Difference/Cal Gas Conc. X 100%

$$= 100\% - \frac{1.3}{500} \times 100\%$$

$$= 99.7\%$$

Span Sensitivity:

Trial 1:
Counts Observed for the Span= <u>149456</u>
Counters Observed for the Zero= <u>2873</u>
Trial 2:
Counts Observed for the Span= <u>149625</u>
Counters Observed for the Zero= <u>2894</u>

Trial 3:
Counts Observed for the Span= <u>149866</u>
Counters Observed for the Zero= <u>2917</u>

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm

Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: 171

Reading: 1.2 ppm

Downwind Location Description: Flare

Reading: 1.5 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

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SURFACE EMISSIONS MONITORING CALIBRATION AND PERTINENT DATA

Date: 7-15-21

Site Name: Newby

Inspector(s): Don

Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 6 MPH

Wind Direction: SSE

Barometric Pressure: 29.98 "Hg

Air Temperature: 57 °F

General Weather Conditions: cloudy

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 1211

Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>1</u>	<u>501</u>	<u>1</u>	<u>4</u>
2	<u>.1</u>	<u>502</u>	<u>2</u>	<u>3</u>
3	<u>-0</u>	<u>505</u>	<u>5</u>	<u>4</u>

Average Difference: 1

*Perform recalibration if average difference is greater than 10

Calibration Precision= Average Difference/Cal Gas Conc. X 100%

$$= 100\% - \frac{1}{500} \times 100\%$$

$$= 99.8\%$$

Span Sensitivity:

Trial 1:	Counts Observed for the Span= <u>115196</u>
	Counters Observed for the Zero= <u>3859</u>
Trial 2:	Counts Observed for the Span= <u>115385</u>
	Counters Observed for the Zero= <u>3874</u>

Trial 3:	Counts Observed for the Span= <u>115562</u>
	Counters Observed for the Zero= <u>3893</u>

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm

Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Gr

Reading: 1.2 ppm

Downwind Location Description: Flare

Reading: 1.5 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

Pre

SURFACE EMISSIONS MONITORING CALIBRATION AND PERTINENT DATA

Date: 7-15-21 Site Name: Newby
Inspector(s): Liam M Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 6 MPH Wind Direction: SSE Barometric Pressure: 29.98 "Hg
Air Temperature: 57 °F General Weather Conditions: cloudy

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 1223 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>0</u>	<u>551</u>	<u>1</u>	<u>4</u>
2	<u>.1</u>	<u>502</u>	<u>2</u>	<u>3</u>
3	<u>.6</u>	<u>500</u>	<u>0</u>	<u>4</u>

Average Difference: 1
*Perform recalibration if average difference is greater than 10

Calibration Precision= Average Difference/Cal Gas Conc. X 100%

$$= 100\% - \frac{1}{500} \times 100\%$$

$$= 99.8\%$$

Span Sensitivity:

Trial 1:	Trial 3:
Counts Observed for the Span= <u>146140</u>	Counts Observed for the Span= <u>146577</u>
Counters Observed for the Zero= <u>2613</u>	Counters Observed for the Zero= <u>2652</u>
Trial 2:	
Counts Observed for the Span= <u>146285</u>	
Counters Observed for the Zero= <u>2638</u>	

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: C1 Reading: 1.3 ppm
Downwind Location Description: Flare Reading: 1.4 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

Pre

SURFACE EMISSIONS MONITORING CALIBRATION AND PERTINENT DATA

Date: 7-15-21

Site Name: Newby

Inspector(s): Hunter O

Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 6 MPH

Wind Direction: SSE

Barometric Pressure: 29.98 "Hg

Air Temperature: 57 °F

General Weather Conditions: cloudy

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 5420

Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>0</u>	<u>500</u>	<u>0</u>	<u>3</u>
2	<u>.1</u>	<u>502</u>	<u>2</u>	<u>4</u>
3	<u>.0</u>	<u>500</u>	<u>0</u>	<u>3</u>

Average Difference: 6

*Perform recalibration if average difference is greater than 10

Calibration Precision= Average Difference/Cal Gas Conc. X 100%

$$= 100\% - \frac{6}{500} \times 100\%$$

$$= 99.9\%$$

Span Sensitivity:

Trial 1:	Counts Observed for the Span= <u>153832</u>
	Counters Observed for the Zero= <u>3481</u>
Trial 2:	Counts Observed for the Span= <u>153992</u>
	Counters Observed for the Zero= <u>3497</u>

Trial 3:	Counts Observed for the Span= <u>154106</u>
	Counters Observed for the Zero= <u>3525</u>

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm

Cal Gas Reading: 506 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: cut

Reading: 1.2 ppm

Downwind Location Description: Flare

Reading: 1.6 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

Post

SURFACE EMISSIONS MONITORING CALIBRATION AND PERTINENT DATA

Date: 7-15-11

Site Name: Newby

Inspector(s): Cody C.

Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 8 MPH

Wind Direction: N

Barometric Pressure: 30 "Hg

Air Temperature: 79 °F

General Weather Conditions: Sunny

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 5415

Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>1</u>	<u>501</u>	<u>1</u>	<u>4</u>
2	<u>0</u>	<u>500</u>	<u>0</u>	<u>3</u>
3	<u>2</u>	<u>503</u>	<u>3</u>	<u>4</u>

Average Difference: 1.3
*Perform recalibration if average difference is greater than 10

Calibration Precision= Average Difference/Cal Gas Conc. X 100%

$$= 100\% - \frac{1.3}{500} \times 100\% = 99.7\%$$

Span Sensitivity:

Trial 1:	Counts Observed for the Span= <u>128003</u>
	Counters Observed for the Zero= <u>41539</u>
Trial 2:	Counts Observed for the Span= <u>127892</u>
	Counters Observed for the Zero= <u>4548</u>

Trial 3:	Counts Observed for the Span= <u>128137</u>
	Counters Observed for the Zero= <u>4576</u>

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm

Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: ctrl

Reading: 1.2 ppm

Downwind Location Description: Flare

Reading: 15 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

Post

SURFACE EMISSIONS MONITORING CALIBRATION AND PERTINENT DATA

Date: 7-15-21

Site Name: Newby

Inspector(s): Bryano

Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 8 MPH

Wind Direction: N

Barometric Pressure: 30 "Hg

Air Temperature: 79 °F

General Weather Conditions: sunny

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 1215

Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>.1</u>	<u>500</u>	<u>0</u>	<u>3</u>
2	<u>.0</u>	<u>502</u>	<u>2</u>	<u>4</u>
3	<u>.2</u>	<u>502</u>	<u>2</u>	<u>1</u>

Average Difference: 1.3

*Perform recalibration if average difference is greater than 10

Calibration Precision= Average Difference/Cal Gas Conc. X 100%

$$= 100\% - \frac{1.3}{500} \times 100\%$$

$$= 99.7\%$$

Span Sensitivity:

Trial 1:	Counts Observed for the Span= <u>148132</u>
	Counters Observed for the Zero= <u>2903</u>
Trial 2:	Counts Observed for the Span= <u>148386</u>
	Counters Observed for the Zero= <u>2927</u>

Trial 3:	Counts Observed for the Span= <u>148602</u>
	Counters Observed for the Zero= <u>2959</u>

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm

Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: G1

Reading: 1.2 ppm

Downwind Location Description: Flare

Reading: 1.6 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

Post

SURFACE EMISSIONS MONITORING CALIBRATION AND PERTINENT DATA

Date: 7-15-11 Site Name: Newby
Inspector(s): Don C Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 8 MPH Wind Direction: N Barometric Pressure: 30 "Hg
Air Temperature: 79 °F General Weather Conditions: Sunny

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 1211 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>.1</u>	<u>500</u>	<u>0</u>	<u>3</u>
2	<u>.0</u>	<u>502</u>	<u>2</u>	<u>4</u>
3	<u>.2</u>	<u>500</u>	<u>0</u>	<u>4</u>

Average Difference: 6

*Perform recalibration if average difference is greater than 10

Calibration Precision= Average Difference/Cal Gas Conc. X 100%

$$= 100\% - \frac{6}{500} \times 100\%$$

$$= \quad \%$$

Span Sensitivity:

Trial 1:	Counts Observed for the Span= <u>114382</u>
	Counters Observed for the Zero= <u>3847</u>
Trial 2:	Counts Observed for the Span= <u>114</u>
	Counters Observed for the Zero= <u>3872</u>

Trial 3:	Counts Observed for the Span= _____
	Counters Observed for the Zero= <u>3603</u>

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: C-1 Reading: 1.2 ppm
Downwind Location Description: Flare Reading: 1.5 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

Post

SURFACE EMISSIONS MONITORING CALIBRATION AND PERTINENT DATA

Date: 2-15-21 Site Name: Newby
Inspector(s): Liamm Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 8 MPH Wind Direction: N Barometric Pressure: 30 "Hg
Air Temperature: 29 °F General Weather Conditions: Sunny

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 1223 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>.1</u>	<u>500</u>	<u>0</u>	<u>4</u>
2	<u>.0</u>	<u>503</u>	<u>2</u>	<u>3</u>
3	<u>.2</u>	<u>500</u>	<u>0</u>	<u>3</u>

Average Difference: .6
*Perform recalibration if average difference is greater than 10

Calibration Precision= Average Difference/Cal Gas Conc. X 100%

$$= 100\% - \frac{.6}{500} \times 100\% = 99.8\%$$

Span Sensitivity:

Trial 1:	Trial 3:
Counts Observed for the Span= <u>146199</u>	Counts Observed for the Span= <u>146592</u>
Counters Observed for the Zero= <u>2648</u>	Counters Observed for the Zero= <u>2669</u>
Trial 2:	
Counts Observed for the Span= <u>146384</u>	
Counters Observed for the Zero= <u>2662</u>	

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: GL Reading: 1.2 ppm
Downwind Location Description: FLARE Reading: 1.4 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

post

SURFACE EMISSIONS MONITORING CALIBRATION AND PERTINENT DATA

Date: 7-13-21 Site Name: Newby
Inspector(s): Hunter Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 6 MPH Wind Direction: SE Barometric Pressure: 30 "Hg
Air Temperature: 57 °F General Weather Conditions: Sunny

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 5420 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>.1</u>	<u>500</u>	<u>0</u>	<u>1</u>
2	<u>.0</u>	<u>502</u>	<u>2</u>	<u>2</u>
3	<u>.1</u>	<u>500</u>	<u>0</u>	<u>3</u>

Average Difference: .6
*Perform recalibration if average difference is greater than 10

Calibration Precision= Average Difference/Cal Gas Conc. X 100%

$$= 100\% - \frac{.6}{500} \times 100\%$$

$$= 99.8\%$$

Span Sensitivity:

Trial 1:	Trial 3:
Counts Observed for the Span= <u>153175</u>	Counts Observed for the Span= <u>153495</u>
Counters Observed for the Zero= <u>3492</u>	Counters Observed for the Zero= <u>3554</u>
Trial 2:	
Counts Observed for the Span= <u>153266</u>	
Counters Observed for the Zero= <u>3523</u>	

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Cr Reading: 1.2 ppm
Downwind Location Description: Flare Reading: 1.6 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

**SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA**

Date: 02/20/21 Site Name: Newby
 Inspector(s): Michael Morris Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 8 MPH Wind Direction: NW Barometric Pressure: 30 "Hg
 Air Temperature: 81 °F General Weather Conditions: Clear

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 5419 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>1.3</u>	<u>500</u>	<u>8</u>	<u>3</u>
2	<u>1.3</u>	<u>500</u>	<u>8</u>	<u>4</u>
3	<u>1.3</u>	<u>500</u>	<u>2</u>	<u>4</u>

Average Difference: 1.3
 *Perform recalibration if average difference is greater than 10

Calibration Precision= Average Difference/Cal Gas Conc. X 100%
 = 100% - 1.3 / 500 x 100%
 = 99.7 %

Span Sensitivity:

Trial 1:	Trial 3:
Counts Observed for the Span= <u>155862</u>	Counts Observed for the Span= <u>157636</u>
Counters Observed for the Zero= <u>4914</u>	Counters Observed for the Zero= 4914 <u>4921</u>
Trial 2:	
Counts Observed for the Span= <u>156832</u>	
Counters Observed for the Zero= 4914 <u>4902</u>	

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Flare Reading: 1.3 ppm
 Downwind Location Description: Entrance Reading: 1.6 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

SURFACE EMISSIONS MONITORING CALIBRATION AND PERTINENT DATA

Date: 07-30-21 Site Name: Newby
 Inspector(s): Liam McGinn Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: ~~18~~ 8 MPH Wind Direction: NW Barometric Pressure: 30 "Hg
 Air Temperature: 81 °F General Weather Conditions: Clear

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 1223 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>0.3</u>	<u>500</u>	<u>3</u>	<u>3</u>
2	<u>0.7</u>	<u>501</u>	<u>0</u>	<u>2</u>
3	<u>0.7</u>	<u>500</u>	<u>0</u>	<u>2</u>

Average Difference: 1
*Perform recalibration if average difference is greater than 10

Calibration Precision= Average Difference/Cal Gas Conc. X 100%
 = 100% - 1 / 500 x 100%
 = 0.2%

Span Sensitivity:

Trial 1: Counts Observed for the Span= <u>25904</u> Counters Observed for the Zero= <u>2623</u>	Trial 3: Counts Observed for the Span= <u>126904</u> Counters Observed for the Zero= <u>2612</u>
Trial 2: Counts Observed for the Span= <u>126233</u> Counters Observed for the Zero= <u>2635</u>	

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Edge Reading: 1.3 ppm
 Downwind Location Description: Entrance Reading: 1.6 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

**SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA**

PKC

Date: 07-30-21 Site Name: Newby
 Inspector(s): Michael Marks Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 2 MPH Wind Direction: SE Barometric Pressure: 30 "Hg
 Air Temperature: 62 °F General Weather Conditions: Cloudy

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 5419 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>1</u>	<u>501</u>	<u>1</u>	<u>3</u>
2	<u>1</u>	<u>501</u>	<u>1</u>	<u>3</u>
3	<u>2</u>	<u>500</u>	<u>1</u>	<u>3</u>

Average Difference: .7
 *Perform recalibration if average difference is greater than 10

Calibration Precision= Average Difference/Cal Gas Conc. X 100%
 = 100% - .7 / 500 x 100%
 = 0.14%

Span Sensitivity:

Trial 1:	Trial 3:
Counts Observed for the Span= <u>144832</u>	Counts Observed for the Span= <u>152851</u>
Counters Observed for the Zero= <u>5040</u>	Counters Observed for the Zero= <u>5014</u>
Trial 2:	
Counts Observed for the Span= <u>156284</u>	
Counters Observed for the Zero= <u>5028</u>	

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: FLARE Reading: 1.2 ppm
 Downwind Location Description: ENTRANCE Reading: 1.5 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

**SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA**

Pre

Date: 07-30-21
Inspector(s): Liam McQuinn

Site Name: Newby
Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 2 MPH Wind Direction: SE Barometric Pressure: 30 "Hg
Air Temperature: 62 °F General Weather Conditions: cloudy

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 1223 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc. - Cal Gas Reading	Response Time (seconds)
1	<u>1</u>	<u>500</u>	<u>0</u>	<u>1</u>
2	<u>1</u>	<u>501</u>	<u>1</u>	<u>3</u>
3	<u>1</u>	<u>502</u>	<u>2</u>	<u>4</u>

Average Difference: 1
*Perform recalibration if average difference is greater than 10

Calibration Precision = Average Difference / Cal Gas Conc. X 100%

$$= \frac{100\% - \underline{1}}{500} \times 100\%$$

$$= \underline{0.2\%}$$

Span Sensitivity:

Trial 1:	Counts Observed for the Span = <u>123896</u>	Trial 3:	Counts Observed for the Span = <u>124623</u>
	Counters Observed for the Zero = <u>2873</u>		Counters Observed for the Zero = <u>2780</u>
Trial 2:	Counts Observed for the Span = <u>125480</u>		
	Counters Observed for the Zero = <u>2790</u>		

Post Monitoring Calibration Check

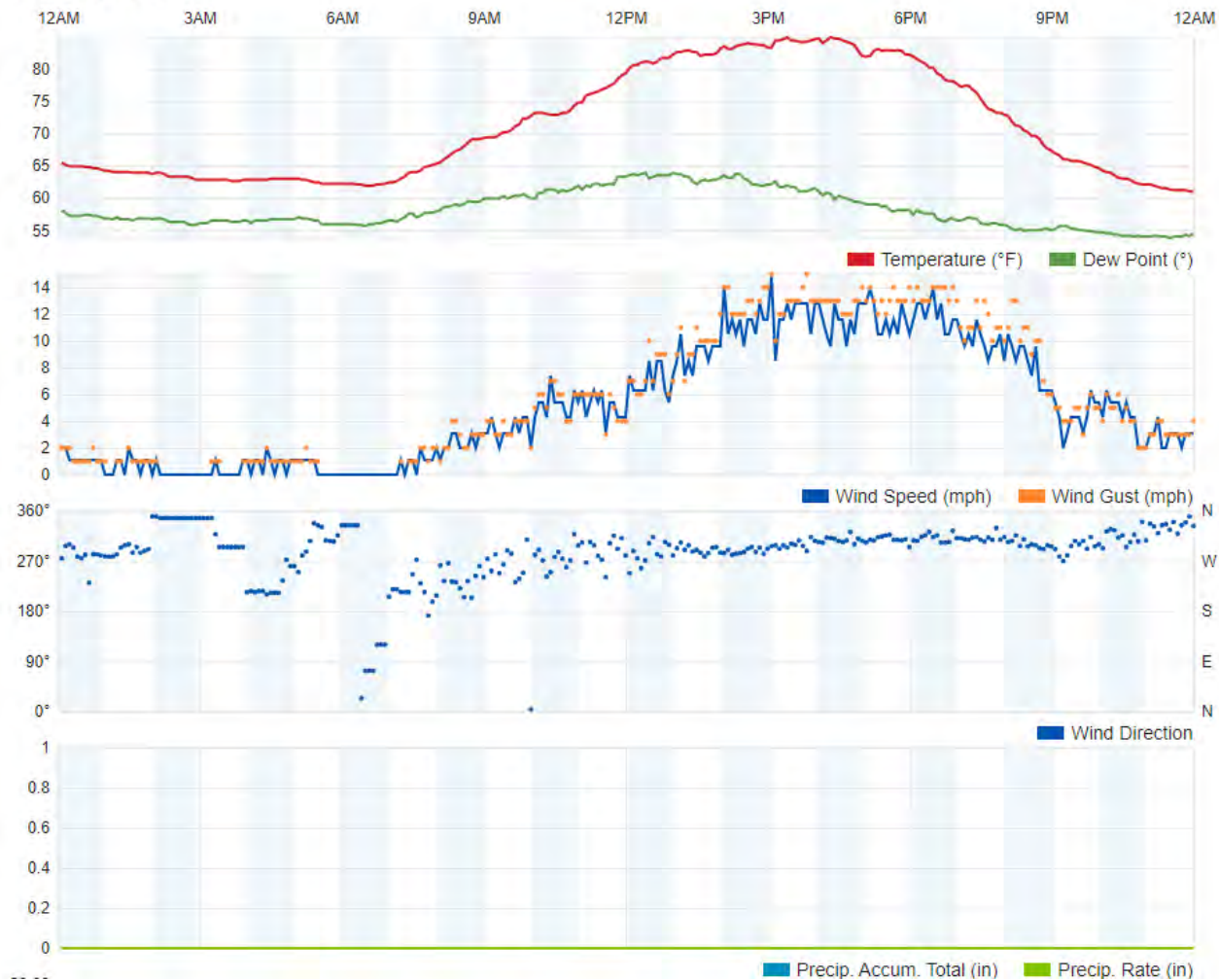
Zero Air Reading: 0 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

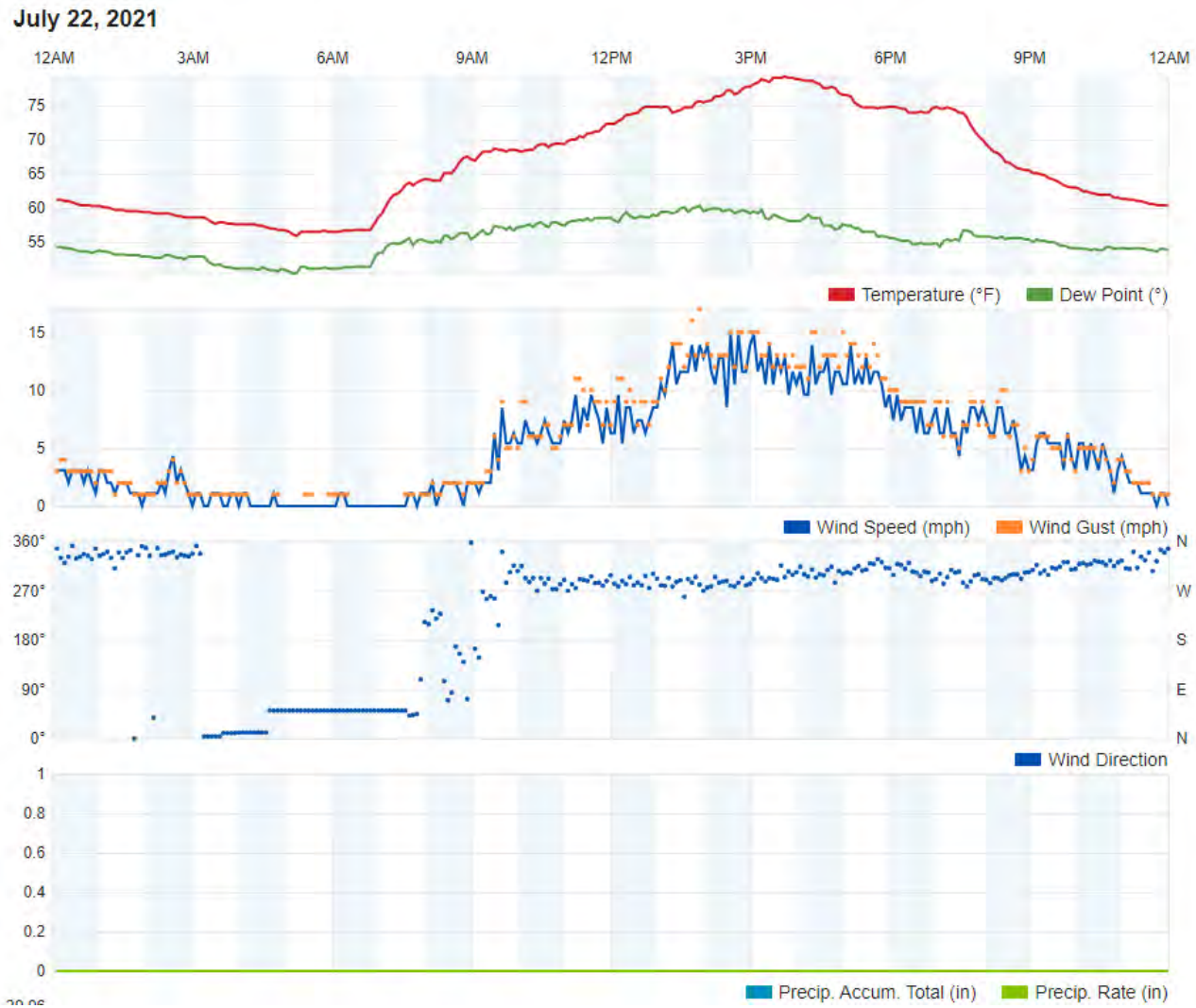
Upwind Location Description: Flare Reading: 1.2 ppm
Downwind Location Description: Entrance Reading: 1.5 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

July 19, 2021

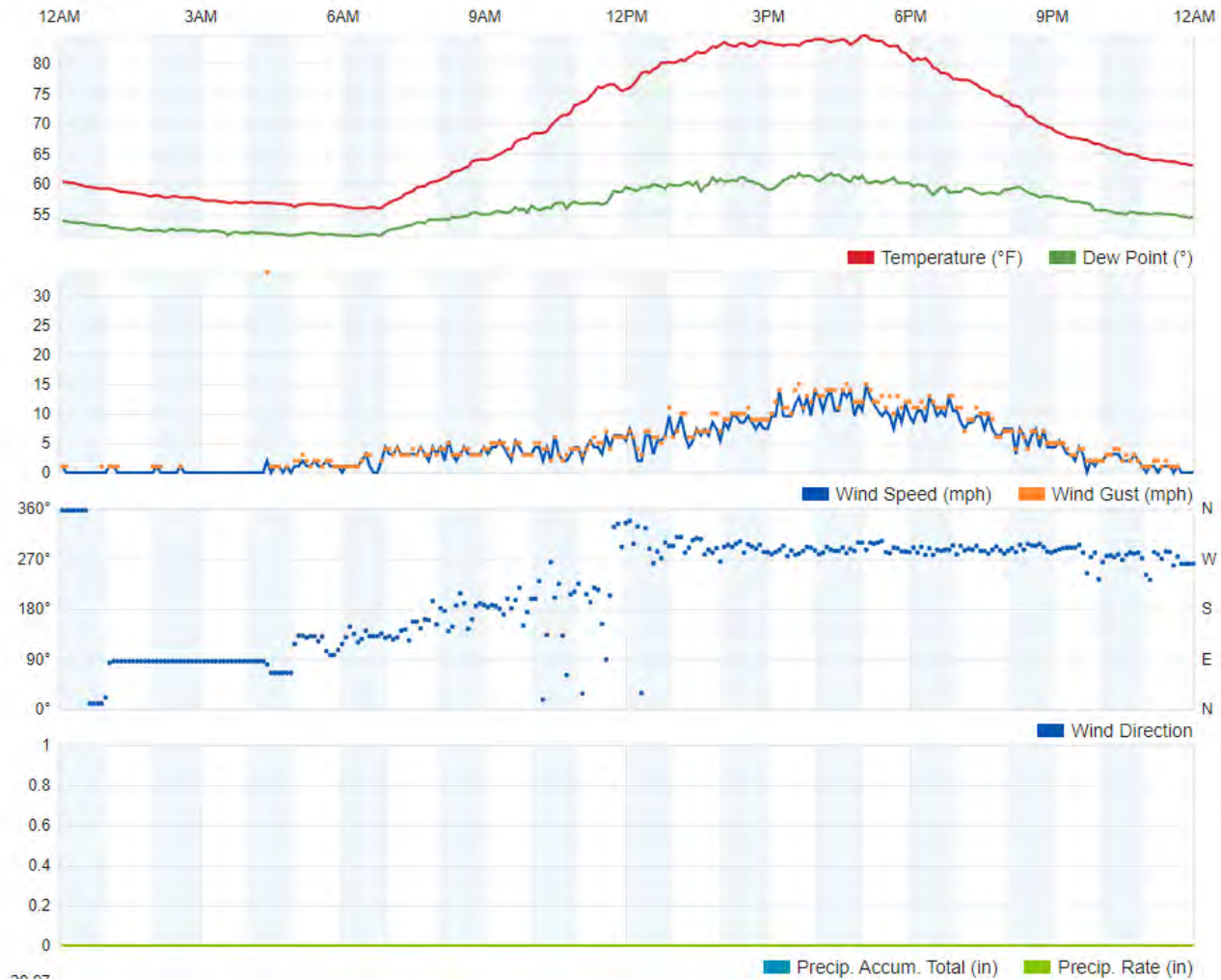


Third Quarter 2021
LMR Surface Emissions Monitoring Weather Data
July 19, 2021
Newby Island Landfill, Milpitas, California



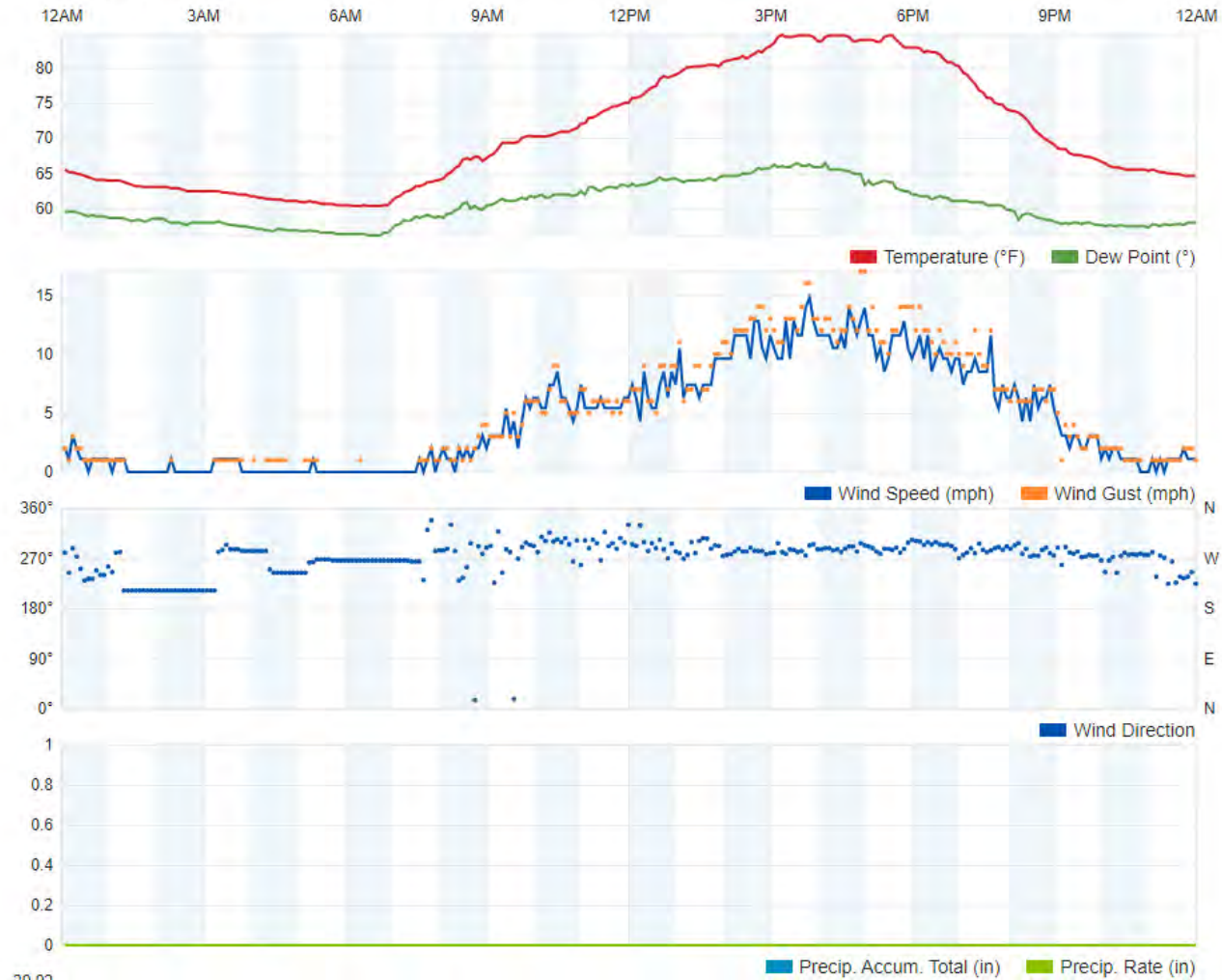
Third Quarter 2021
 LMR Surface Emissions Monitoring Weather Data
 July 22, 2021
 Newby Island Landfill, Milpitas, California

July 23, 2021



Third Quarter 2021
LMR Surface Emissions Monitoring Weather Data
July 23, 2021
Newby Island Landfill, Milpitas, California

July 30, 2021



Third Quarter 2021
LMR Surface Emissions Monitoring Weather Data
July 30, 2021
Newby Island Landfill, Milpitas, California

February 23, 2022
File No. 07221077.00

Ms. Rachelle Huber
Republic Services – Newby Island Landfill
1601 Dixon Landing Road
Milpitas, California 95035

Subject: Newby Island Landfill - Milpitas, California

Landfill Methane Rule (LMR) and New Source Performance Standards (NSPS)
Surface Emissions Monitoring for Fourth Quarter 2021.

Dear Ms. Huber:

SCS Field Services (SCS) is pleased to provide the Republic Services, with the enclosed report summarizing the surface emissions monitoring services provided at the Newby Island Landfill (Site) during the Fourth Quarter 2021. This report includes the results of surface scan, component emissions and blower/flare station emissions monitoring for the Site for this monitoring period.

SCS appreciates the opportunity to be of assistance to Republic Services on this project. As you review the enclosed information, please contact Michael Flanagan at (510) 363-7796 or Whitney Stackhouse at (209) 338-7990 if you have any questions or comments.

Sincerely,



Whitney Stackhouse
Project Manager
SCS Field Services



Michael Flanagan
Project Manager
SCS Field Services

Encl.

Sean Bass, SCS Field Services
Art Jones, SCS Field Services



Newby Island Landfill

Landfill Methane Rule (LMR) and New Source Performance Standards (NSPS) Surface Emissions Monitoring

Fourth Quarter 2021

Presented to:



Ms. Rachelle Huber
Republic Services – Newby Island
1601 Dixon Landing Road
Milpitas, California 95035

SCS FIELD SERVICES

File No. 07221077.00 Task 01 | February 23, 2022

SCS FIELD SERVICES
4730 Enterprise Way Suite A
Modesto, CA 95356

Newby Island Landfill

Landfill Methane Rule (LMR) and New Source Performance Standards (NSPS) Surface Emissions Monitoring Fourth Quarter 2021

INTRODUCTION

This letter provides results of the November 8, 15, 17, 18, 19, 24, 29, and 30, 2021 and December 3, 8, 9, and 15, 2021, LMR and NSPS landfill surface emissions monitoring (SEM) performed by SCS Field Services (SCS) at the subject site. All work was performed in accordance with our approved Work Scope dated December 23, 2020, and the LMR requirements.

SUMMARY AND CONCLUSIONS

As stipulated in LMR, if uncorrectable exceedances within the 10-day limitation are detected or emissions are discovered during an inspection by Regulatory Agencies, the landfill must perform monitoring on a 25-foot pathway on a quarterly basis for active disposal sites. Upon completion of four consecutive SEM events without an uncorrectable exceedance of the 25 ppmv or 500 ppmv standards, other than non-repeatable momentary readings, the landfill may perform the monitoring on a 100-foot spacing on an annual basis for closed landfills or quarterly for active disposal sites. Therefore, based on the previous monitoring events, in which exceedances were observed, the monitoring at the Newby Island Landfill was performed on 25-foot pathways in accordance with the LMR.

On, November 8, 15, 17, 18, 19, 24, 29, and 30, 2021 and December 3, 8, 9, and 15, 2021, SCS performed fourth quarter 2021 SEM as required by the Bay Area Air Quality Management District (BAAQMD). Instantaneous surface emissions monitoring results indicated that forty-three (43) locations exceeded the 500 ppmv maximum concentration during the initial monitoring event (Table 1 in Attachment 3). The required first 10-day (LMR/NSPS) and 30-day (NSPS) follow-up monitoring indicated that all areas return to below regulatory compliance limits following system adjustments and remediation (well field adjustments and installation of new bentonite plugs) by site personnel. Based on these monitoring results no additional follow up testing was required at this time. These results are discussed in a subsequent section of this report.

Also, during the instantaneous monitoring event, SCS performed concurrent integrated monitoring of the landfill surface. As required by the LMR, the landfill was divided into 50,000 square foot areas. The Newby Island Landfill surface area was therefore divided into 233 grids, as shown on Figure 1 in Attachment 1. During this monitoring event, several grids were not monitored, in accordance with the regulations, due to ongoing active landfilling activities, unsafe conditions, or there was no waste in place prior to the monitoring event.

During the monitoring event, there were thirty-eight (38) grid areas observed to exceed the 25 ppmv LMR integrated average threshold (Table 2 in Attachment 4). The required first and second 10-day LMR follow-up monitoring indicated that all areas did not return to compliance following system

adjustments and remediation by SCS and site personnel. Based on these monitoring results, and in accordance with the LMR, the site is required to perform a system expansion within 120-days of the third observed exceedance which will be due on April 2, 2022.

In addition, quarterly monitoring of the pressurized piping or components of the Gas Collection and Control System (GCCS) that are under positive pressure must be performed. Results of the testing of the landfill gas (LFG) Blower Flare Station (BFS) pressurized piping and components indicated that all test locations were in compliance with the 500 ppmv requirement.

Further, as required under the LMR, any location on the landfill that has an observed instantaneous methane concentration above 200 ppmv, must be stake-marked and Global Positioning System (GPS) located on a site figure. During this reporting period, thirty-six (36) locations were observed to exceed the 200 ppmv, reporting threshold. When these readings are observed, the locations are reported to site personnel for tracking and/or remediation and will be reported in the next submittal of the annual LMR report.

Finally, to help prevent potential future exceedances, SCS recommends that the landfill surface be routinely inspected and any observed surface erosion be routinely repaired.

BACKGROUND

The Newby Island Landfill is an active 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 gas, 40 to 50 percent carbon dioxide, and trace amount of various other gases, some of which are odorous. The Newby Island property contains a system to control the combustible gases generated in the landfill.

SURFACE EMISSIONS MONITORING

On November 8, 15, 17, 18, 19, 24, 29, and 30, 2021 and December 3, 8, 9, and 15, 2021, the instantaneous and integrated SEM was performed over the surface of the subject site. The intent of the monitoring was to identify any specific locations or areas of the landfill surface with organic compound concentrations exceeding the LMR threshold limit values of 500 ppmv measured as methane for instantaneous monitoring, or an average methane concentration of 25 ppmv for the integrated monitoring in the 50,000 square foot grids as required under the LMR. During this event, SCS performed the monitoring on a 25-foot pathway in accordance with the rules as required.

EMISSIONS TESTING INSTRUMENTATION/CALIBRATION

Instruments used to perform the landfill surface emission 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 TVA 2020 meets the State of California Air Resources Board (CARB) requirements for combined instantaneous and integrated monitoring and was calibrated in accordance with United States Environmental Protection Agency (US EPA) Method 21.
- Weather Anemometer with continuous recorder for meteorological conditions in accordance with the LMR.

Instrument calibration logs and weather information are shown in Attachments 5 and 6.

SURFACE EMISSIONS MONITORING PROCEDURES

Surface emissions monitoring was conducted in accordance with the LMR and NSPS requirements. Monitoring was performed with the FID inlet held within 3-inches of the landfill surface while a technician walked a grid in parallel paths not more than 25 -feet apart over the surface of the landfill. Cracks, holes and other cover penetrations in the surface were also tested. Surface emissions readings were monitored continuously and recorded every 5 seconds. Any areas in exceedance of the 200 or 500 ppmv standards (reporting and compliance levels, respectively) would be GPS tagged and stake-marked for on-site personnel to perform remediation or repairs.

The integrated average is based on the readings stored on the instrument, which are recorded every 5 seconds. The readings are then downloaded and the averages are calculated for each grid using SCS eTools®. All readings are maintained in this secure SCS Database. The readings are not provided in the report due to the volume of readings, but can be furnished upon request.

Recorded wind speed results are shown in Attachment 6. Wind speed averages were observed to remain below the alternative threshold of 10 miles per hour, and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within 72 hours of the monitoring events. Therefore, site meteorological conditions were within the alternatives of the LMR requirements on the above mentioned dates.

TESTING RESULTS

During this event, SCS performed the monitoring on a 25-foot pathway in accordance with the rule as required under the LMR and NSPS. The intent of the monitoring was to identify any specific locations or areas of the landfill surface with organic compound concentrations exceeding the LMR or NSPS threshold limit values of 500 ppmv measured as methane for instantaneous monitoring, or an average methane concentration of 25 ppmv for the integrated monitoring (LMR).

On November 8, 15, 17, 18, 19, 24, 29, and 30, 2021 and December 3, 8, 9, and 15, 2021, SCS performed fourth quarter 2021 instantaneous emissions monitoring testing as required by the BAAQMD. During this monitoring, surface emissions results indicated that forty-three (43) locations exceeded the 500 ppmv maximum concentration. The required first 10-day (LMR/NSPS) and 30-day (NSPS) follow-up monitoring performed on November 18 and 24, 2021 and December 8 and 15, 2021, respectively, indicated that all locations returned below compliance limits as required, following system adjustments and remediation (wellfield adjustment and borehole repairs using bentonite and soil) performed by SCS and site personnel. Based on these monitoring results no additional follow up testing was required. Results of the initial and follow up monitoring are shown in Attachments 2 and 3 (Table 1).

Additionally, calculated integrated grid monitoring indicated thirty-eight (38) integrated exceedances of the 25-ppmv requirement on November 15, 17, 18, 19, 24, 29 and 30, 2021. The required first and second 10-day LMR follow-up monitoring performed on November 24 and 29 and December 3, 9 and 15, 2021, indicated that all areas had not returned to compliance following system adjustments and remediation by site personnel. In accordance with LMR requirements for expansion and remediation, the exceedance locations need to be remediated and returned to compliance in accordance with the rule (expansion of the collection system or an alternative compliance option if approved by the BAAQMD) within 120 days of the third observed integrated exceedance, which will be due by April 2, 2022. Results of the initial and follow up monitoring are shown in Attachment 4 (Table 2). Calibration logs for the monitoring equipment are provided in Attachment 5.

During this monitoring event, several grids were not monitored, in accordance with the LMR, due to active landfilling activities, unsafe conditions or no waste in place. SCS will continue to monitor all accessible locations during the first quarter 2022.

PRESSURIZED PIPE AND COMPONENT LEAK MONITORING

On November 29, 2021, quarterly leak monitoring was performed in accordance with the LMR. SCS performed LFG pressurized pipe and component leak monitoring at the BFS. Monitoring was performed with the detector inlet held one-half of an inch from pressurized pipe and associated components. No locations exceeding the 500 ppmv threshold were observed during our monitoring event. The maximum reading, which was 114 ppmv, was below the maximum threshold (see Table 1 for component results). Therefore, all pressurized piping and components located at the LFG BFS were in compliance at the time of our testing.

PROJECT SCHEDULE

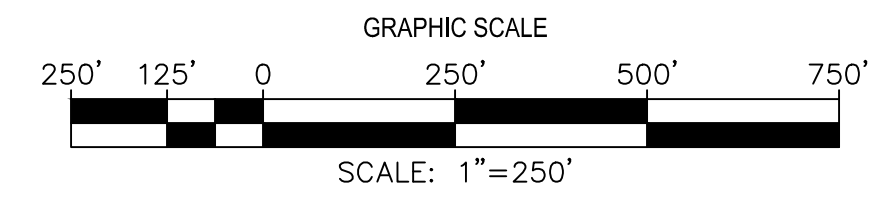
According to the LMR and NSPS, surface emissions monitoring at active landfills is required to be performed on a quarterly basis. Therefore, in accordance with our approved Work Scope, the first quarter 2022 (January through March) surface emissions testing event is scheduled to be performed by the end of February 2022 in accordance with the Republic SOP unless an alternative timeline is requested by site personnel.

STANDARD PROVISIONS

This report addresses conditions of the subject site during the testing dates only. Accordingly, we assume no responsibility for any changes that may occur subsequent to our testing which could affect the surface emissions at the subject site or adjacent properties.

Attachment 1

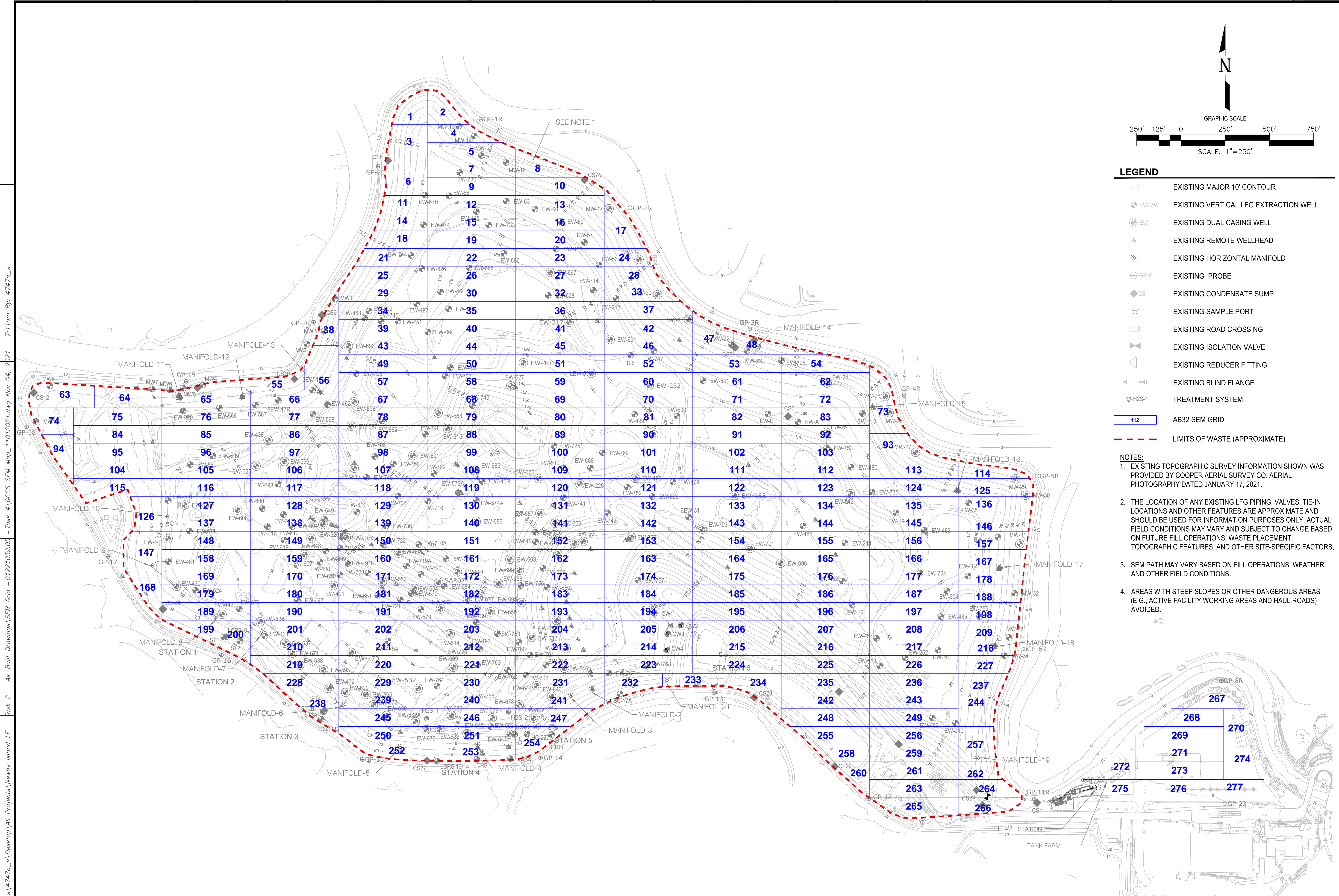
Landfill Grid



LEGEND

	EXISTING MAJOR 10' CONTOUR
	EXISTING VERTICAL LFG EXTRACTION WELL
	EXISTING DUAL CASING WELL
	EXISTING REMOTE WELLHEAD
	EXISTING HORIZONTAL MANIFOLD
	EXISTING PROBE
	EXISTING CONDENSATE SUMP
	EXISTING SAMPLE PORT
	EXISTING ROAD CROSSING
	EXISTING ISOLATION VALVE
	EXISTING REDUCER FITTING
	EXISTING BLIND FLANGE
	TREATMENT SYSTEM
	AB32 SEM GRID
	LIMITS OF WASTE (APPROXIMATE)

- NOTES:**
- EXISTING TOPOGRAPHIC SURVEY INFORMATION SHOWN WAS PROVIDED BY COOPER AERIAL SURVEY CO. AERIAL PHOTOGRAPHY DATED JANUARY 17, 2021.
 - THE LOCATION OF ANY EXISTING LFG PIPING, VALVES, TIE-IN LOCATIONS AND OTHER FEATURES ARE APPROXIMATE AND SHOULD BE USED FOR INFORMATION PURPOSES ONLY. ACTUAL FIELD CONDITIONS MAY VARY AND SUBJECT TO CHANGE BASED ON FUTURE FILL OPERATIONS, WASTE PLACEMENT, TOPOGRAPHIC FEATURES, AND OTHER SITE-SPECIFIC FACTORS.
 - SEM PATH MAY VARY BASED ON FILL OPERATIONS, WEATHER, AND OTHER FIELD CONDITIONS.
 - AREAS WITH STEEP SLOPES OR OTHER DANGEROUS AREAS (E.G., ACTIVE FACILITY WORKING AREAS AND HAUL ROADS) AVOIDED.



C:\Users\4747a...s\Desktop\Newby_Island_LF - Task 2 - As-Built Drawings\SEM Grid - 01221039.05 - Task 4\GCCS_SEM Map_11012021.dwg Nov 04, 2021 - 7:11am By: 4747a.s

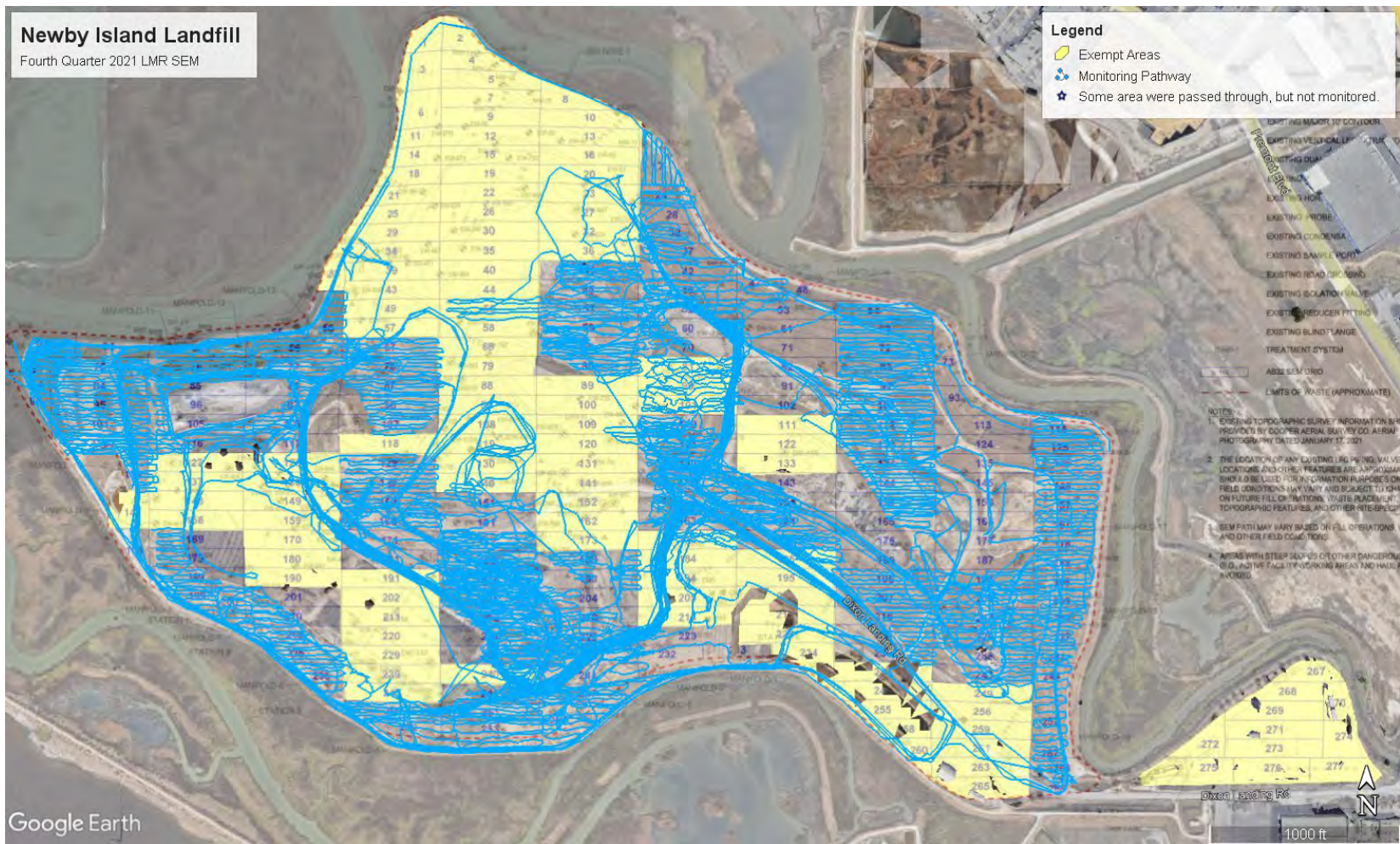
DATE	
REVISION	
NO.	
SHEET TITLE:	GCCS SEM MAP
PROJECT TITLE:	NEWBY ISLAND LANDFILL MILPITAS, CALIFORNIA
CLIENT:	
DATE:	11-04-21
SCALE:	AS SHOWN
SHEET:	1

SCS ENGINEERS
ENVIRONMENTAL CONSULTANTS
1500 CALIFORNIA STREET, SUITE 200
PLEASANTON, CA 94588
(925)426-0080

PROJ. NO: 01221039.05 T4
APP. BY: AAS
CHK. BY: MD

Attachment 2

Surface Pathway



Fourth Quarter 2021
LMR Surface Emissions Monitoring Pathway
Newby Island Landfill, Milpitas, California

Attachment 3

Instantaneous and Component Emissions Monitoring Results

Fourth Quarter 2021

Table 1. LMR Instantaneous Surface and Component Emissions Monitoring Results

Newby Island Sanitary Landfill, Milpitas, California

*Instantaneous Data Report for November 8, 15, 17,
18, 19, 24, 29, and 30, 2021 and December 3, 8, 9, and 15, 2021.*

Location Well ID or Grid Number	Initial Monitoring (ppmv)	Initial Monitoring (ppmv)	Initial Monitoring (ppmv)	Initial Monitoring (ppmv)	10-Day Follow Up Monitoring (ppmv)	10-Day Follow Up Monitoring (ppmv)	30-Day Follow Up Monitoring (ppmv)	30-Day Follow Up Monitoring (ppmv)	Position (Lat/Long)
	Nov 8, 2021	Nov 15, 2021	Nov 17, 2021	Nov 19, 2021	Nov 18, 2021	Nov 24, 2021	Dec 8, 2021	Dec 15, 2021	
NILEW599	--	540	--	--	--	186	--	26	N37° 27.592' W121° 56.858'
NILEW611	--	780	--	--	--	57	--	57	N37° 27.545' W121° 56.775'
NILEW620	--	7,000	--	--	--	259	--	259	N37° 27.497' W121° 56.816'
NILEW638	--	30,000	--	--	--	20	--	200	N37° 27.402' W121° 56.836'
NILEW640	2,000	--	--	--	174	--	221	--	N37° 27.339' W121° 56.639'
NILEW643	3,000	--	--	--	174	--	222	--	N37° 27.374' W121° 56.541'
NILEW650	--	780	--	--	--	236	--	236	N37° 27.486' W121° 56.791'
NILEW681	4,000	--	--	--	283	--	270	--	N37° 27.421' W121° 56.522'
NILEW692	--	600	--	--	--	238	--	200	N37° 27.730' W121° 56.763'
NILEW706	--	3,500	--	--	--	350	--	31	N37° 27.675' W121° 56.777'
NILCS10B	--	10,000	--	--	--	120	--	50	N37° 27.671' W121° 56.852'
NILW227A	600	--	--	--	417	--	122	--	N37° 27.341' W121° 56.571'
24" t	2,000	--	--	--	368	--	55	--	N37° 27.331' W121° 56.577'
NILEW460	500	--	--	--	324	--	260	--	N37° 27.361' W121° 56.096'
NILEW461	--	1,200	--	--	--	138	--	94	N37° 27.495' W121° 56.991'
NILEW480	600	--	--	--	150	--	1.3	--	N37° 27.593' W121° 56.195'
NILEW672	1,000	--	--	--	90	--	173	--	N37° 27.365' W121° 56.750'

Fourth Quarter 2021

**Table 1. LMR Instantaneous Surface and Component
Emissions Monitoring Results
Newby Island Sanitary Landfill, Milpitas, California**

Location Well ID or Grid Number	Initial Monitoring (ppmv) Nov 8, 2021	Initial Monitoring (ppmv) Nov 15, 2021	Initial Monitoring (ppmv) Nov 17, 2021	Initial Monitoring (ppmv) Nov 19, 2021	10-Day Follow Up Monitoring (ppmv) Nov 18, 2021	10-Day Follow Up Monitoring (ppmv) Nov 24, 2021	30-Day Follow Up Monitoring (ppmv) Dec 8, 2021	30-Day Follow Up Monitoring (ppmv) Dec 15, 2021	Position (Lat/Long)
NILEW678	550	--	--	--	38	--	22	--	N37° 27.366' W121° 56.579'
NILEW702	3,000	--	--	--	250	--	163	--	N37° 27.526' W121° 56.451'
NILEW712	2,000	--	--	--	387	--	8	--	N37° 27.395' W121° 56.571'
NILEW715	10,000	--	--	--	230	--	386	--	N37° 27.404' W121° 56.548'
NILEW753	800	--	--	--	1.5	--	18	--	N37° 27.611' W121° 56.225'
NILEW767	20,000	--	--	--	237	--	90	--	N37° 27.398' W121° 56.476'
NIHC17-1	1,000	--	--	--	167	--	239	--	N37° 27.512' W121° 56.494'
NIHC17-3	11,000	--	--	--	318	--	245	--	N37° 27.461' W121° 56.520'
NIHC17-5	10,000	--	--	--	217	--	329	--	N37° 27.471' W121° 56.521'
NIHC17-6	700	--	--	--	165	--	230	--	N37° 27.449' W121° 56.515'
NIHC17-7	2,000	--	--	--	387	--	167	--	N37° 27.429' W121° 56.509'
NILLEW10	5,000	--	--	--	180	--	ACTIVE	--	N37° 27.616' W121° 56.400'
LM19 Surface Grid 193	--	702	--	--	--	171	--	70	N37° 27.456' W121° 56.582'
Surface Grid 219a	--	2,000	--	--	--	197	--	10	N37° 27.411' W121° 56.853'
Surface Grid 219b	--	1,500	--	--	--	15	--	6	N37° 27.406' W121° 56.902'
P1	--	1,000	--	--	--	321	--	90	N37° 27.453' W121° 56.998'
RM1 Surface Grid 62	--	--	650	--	--	12	--	1.7	N37° 27.668' W121° 56.184'
RM111 Surface Grid 74	--	--	--	20,000	--	8	--	222	N37° 27.641' W121° 57.137'
RM2 Surface Grid 74	--	--	--	1,000	--	4.2	--	2.8	N37° 27.640' W121° 57.132'
RM3 Surface Grid 74	--	--	--	1,000	--	4.5	4.5	--	N37° 27.637' W121° 57.135'

Fourth Quarter 2021

**Table 1. LMR Instantaneous Surface and Component
Emissions Monitoring Results
Newby Island Sanitary Landfill, Milpitas, California**

Location Well ID or Grid Number	Initial Monitoring (ppmv) Nov 8, 2021	Initial Monitoring (ppmv) Nov 15, 2021	Initial Monitoring (ppmv) Nov 17, 2021	Initial Monitoring (ppmv) Nov 19, 2021	10-Day Follow Up Monitoring (ppmv) Nov 18, 2021	10-Day Follow Up Monitoring (ppmv) Nov 24, 2021	30-Day Follow Up Monitoring (ppmv) Dec 8, 2021	30-Day Follow Up Monitoring (ppmv) Dec 15, 2021	Position (Lat/Long)
NILSAR08	--	1,500	--	--	--	197	197	--	N37° 27.521' W121° 56.786'
NISS17-2	3,300	--	--	--	233	--	334	--	N37° 27.522' W121° 56.456'
NISS17-4	10,000	--	--	--	282	--	312	--	N37° 27.443' W121° 56.514'
NISS17-5	2,000	--	--	--	324	--	405	--	N37° 27.420' W121° 56.502'
NISS17-6	10,000	--	--	--	174	--	385	--	N37° 27.397' W121° 56.496'
Station5	4,000	--	--	--	18	--	222	--	N37° 27.335' W121° 56.538'
NILEW595	--	220	--	--	--	--	--	--	N37° 27.374' W121° 56.759'
NILEW629	--	320	--	--	--	--	--	--	N37° 27.377' W121° 56.783'
NILEW742	330	--	--	--	--	--	--	--	N37° 27.548' W121° 56.477'
Surface Grid 126	--	--	--	--	200	--	--	--	N37° 27.564' W121° 57.055'
NILEW681	--	--	--	238	--	--	--	--	N37° 27.420' W121° 56.522'
24" Pipe	300	--	--	--	--	--	--	--	N37° 27.338' W121° 56.753'
NILEW460	--	--	--	324	--	--	--	--	N37° 27.361' W121° 56.096'
NILEW680	450	--	--	--	--	--	--	--	N37° 27.355' W121° 56.657'
NILEW684	--	235	--	--	--	--	--	--	N37° 27.476' W121° 56.670'
NILEW719	--	250	--	--	--	--	--	--	N37° 27.495' W121° 56.714'
NILEW759	450	--	--	--	--	--	--	--	N37° 27.434' W121° 56.605'
NILEW765	350	--	--	--	--	--	--	--	N37° 27.372' W121° 56.634'
Surface Grid 115a	--	--	--	--	300	--	--	--	N37° 27.580' W121° 57.071'
Surface Grid 115b	--	--	--	--	475	--	--	--	N37° 27.568' W121° 57.114'

Fourth Quarter 2021

**Table 1. LMR Instantaneous Surface and Component
Emissions Monitoring Results
Newby Island Sanitary Landfill, Milpitas, California**

Location Well ID or Grid Number	Initial Monitoring (ppmv) Nov 8, 2021	Initial Monitoring (ppmv) Nov 15, 2021	Initial Monitoring (ppmv) Nov 17, 2021	Initial Monitoring (ppmv) Nov 19, 2021	10-Day Follow Up Monitoring (ppmv) Nov 18, 2021	10-Day Follow Up Monitoring (ppmv) Nov 24, 2021	30-Day Follow Up Monitoring (ppmv) Dec 8, 2021	30-Day Follow Up Monitoring (ppmv) Dec 15, 2021	Position (Lat/Long)
Surface Grid 174	--	--	350	--	--	--	--	--	N37° 27.501' W121° 56.450'
Surface Grid 222	--	--	350	--	--	--	--	--	N37° 27.407' W121° 56.506'
Surface Grid 231	--	--	316	--	--	--	--	--	N37° 27.402' W121° 56.499'
Surface Grid 74	--	--	--	--	300	--	--	--	N37° 27.647' W121° 57.138'
Surface Grid 95	--	--	--	--	400	--	--	--	N37° 27.603' W121° 57.105'
LM11 Surface Grid 213	--	203	--	--	--	--	--	--	N37° 27.429' W121° 56.528'
LM12 Surface Grid 213	--	237	--	--	--	--	--	--	N37° 27.429' W121° 56.515'
LM13 Surface Grid 212	--	382	--	--	--	--	--	--	N37° 27.431' W121° 56.602'
LM131 Surface Grid 213	--	421	--	--	--	--	--	--	N37° 27.433' W121° 56.597'
LM14 Surface Grid 213	--	394	--	--	--	--	--	--	N37° 27.434' W121° 56.560'
LM141 Surface Grid 203	--	444	--	--	--	--	--	--	N37° 27.441' W121° 56.648'
LM16 Surface Grid 192	--	282	--	--	--	--	--	--	N37° 27.468' W121° 56.652'
LM182 Surface Grid 204	--	234	--	--	--	--	--	--	N37° 27.448' W121° 56.560'
LM20 Surface Grid 192	--	256	--	--	--	--	--	--	N37° 27.459' W121° 56.599'
LM31 Surface Grid 193	--	--	247	--	--	--	--	--	N37° 27.468' W121° 56.595'
LM4 Surface Grid 231	--	282	--	--	--	--	--	--	N37° 27.403' W121° 56.558'
LM51 Surface Grid 192	--	--	319	--	--	--	--	--	N37° 27.462' W121° 56.603'
LM6 Surface Grid 222	--	--	200	--	--	--	--	--	N37° 27.416' W121° 56.548'
LM61 Surface Grid 182	--	--	200	--	--	--	--	--	N37° 27.477' W121° 56.682'

Fourth Quarter 2021

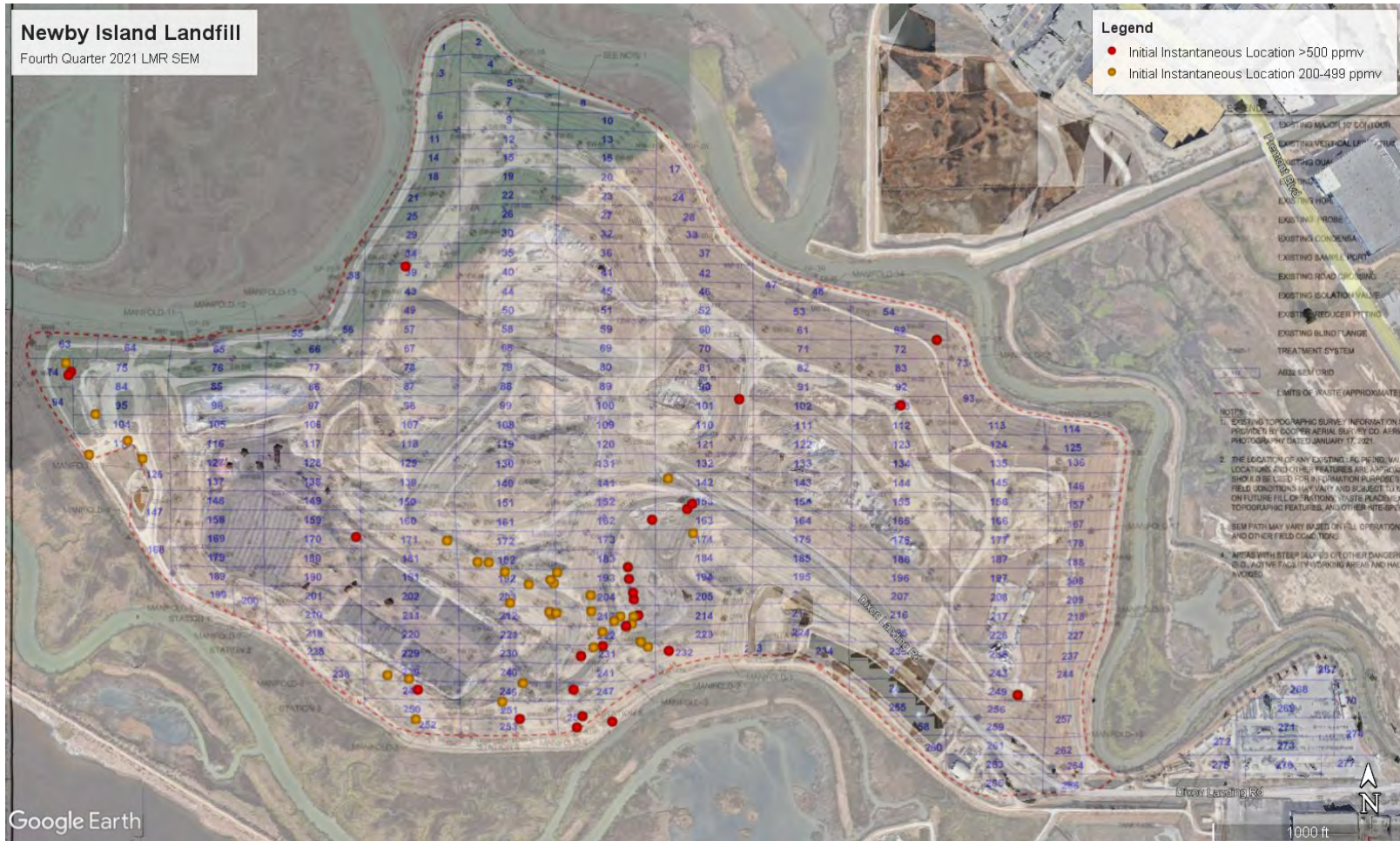
**Table 1. LMR Instantaneous Surface and Component Emissions Monitoring Results
Newby Island Sanitary Landfill, Milpitas, California**

Location Well ID or Grid Number	Initial Monitoring (ppmv) Nov 8, 2021	Initial Monitoring (ppmv) Nov 15, 2021	Initial Monitoring (ppmv) Nov 17, 2021	Initial Monitoring (ppmv) Nov 19, 2021	10-Day Follow Up Monitoring (ppmv) Nov 18, 2021	10-Day Follow Up Monitoring (ppmv) Nov 24, 2021	30-Day Follow Up Monitoring (ppmv) Dec 8, 2021	30-Day Follow Up Monitoring (ppmv) Dec 15, 2021	Position (Lat/Long)
LM62 Surface Grid 192	--	--	396	--	--	--	--	--	N37° 27.458' W121° 56.627'
LM81 Surface Grid 213	--	200	--	--	--	--	--	--	N37° 27.423' W121° 56.516'
LM9 Surface Grid 213	--	300	--	--	--	--	--	--	N37° 27.425' W121° 56.535'

Pressurized Pipe

Location	Initial Concentration (ppmv) Nov 29, 2021	Latitude	Latitude
Flare Station	114	37.455070°	121.950284°

No other exceedances of the 500 ppm threshold observed during the LMR/NSPS monitoring performed during the fourth quarter 2021.



Fourth Quarter 2021
 Initial Emissions Monitoring Locations Greater Than 200 ppmv
 Newby Island Landfill Milpitas, California

Attachment 4

Integrated Monitoring Results

Fourth Quarter 2021

Table 2. Integrated Surface Emissions Monitoring Results Newby Island Landfill, Milpitas, California

Point Name	Record Date	FID Concentration (ppm)	Comments
NIL-001	--	--	Exempted
NIL-002	--	--	Exempted
NIL-003	--	--	Exempted
NIL-004	--	--	Exempted
NIL-005	--	--	Exempted
NIL-006	--	--	Exempted
NIL-007	--	--	Exempted
NIL-008	--	--	Exempted
NIL-009	--	--	Exempted
NIL-010	--	--	Exempted
NIL-011	--	--	Exempted
NIL-012	--	--	Exempted
NIL-013	--	--	Exempted
NIL-014	--	--	Exempted
NIL-015	--	--	Exempted
NIL-016	--	--	Exempted
NIL-017	11/24/2021	2.01	
NIL-018	--	--	Exempted
NIL-019	--	--	Exempted
NIL-020	--	--	Exempted
NIL-021	--	--	Exempted
NIL-022	--	--	Exempted
NIL-023	--	--	Exempted
NIL-024	11/24/2021	1.97	
NIL-025	--	--	Exempted
NIL-026	--	--	Exempted
NIL-027	--	--	Exempted
NIL-028	11/24/2021	1.33	
NIL-029	--	--	Exempted
NIL-030	--	--	Exempted
NIL-031	--	--	Grid Not On Map
NIL-032	--	--	Exempted
NIL-033	11/29/2021	5.80	
NIL-034	--	--	Exempted
NIL-035	--	--	Exempted
NIL-036	--	--	Exempted
NIL-037	11/29/2021	5.65	
NIL-038	--	--	Exempted
NIL-039	--	--	Exempted
NIL-040	--	--	Exempted
NIL-041	11/29/2021	5.39	
NIL-042	11/24/2021	1.40	
NIL-043	--	--	Exempted



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Table 2. Integrated Surface Emissions Monitoring Results Newby Island Landfill, Milpitas, California

NIL-044	--	--	Exempted
NIL-045	11/29/2021	9.40	
NIL-046	11/29/2021	5.49	
NIL-047	11/18/2021	4.94	
NIL-048	11/18/2021	7.04	
NIL-049	--	--	Exempted
NIL-050	--	--	Exempted
NIL-051	11/24/2021	7.59	
NIL-052	11/24/2021	3.53	
NIL-053	11/18/2021	8.15	
NIL-054	11/17/2021	1.34	
NIL-055	11/19/2021	62.86	Initial Monitoring
NIL-055	11/29/2021	36.27	First 10-Day Follow Up
NIL-055	12/9/2021	2.36	Second 10-Day Follow Up
NIL-056	11/19/2021	9.62	
NIL-057	--	--	Exempted
NIL-058	--	--	Exempted
NIL-059	11/29/2021	14.39	
NIL-060	11/29/2021	31.07	Initial Monitoring
NIL-060	12/9/2021	2.69	First 10-Day Follow Up
NIL-061	11/24/2021	2.52	
NIL-062	11/17/2021	8.83	
NIL-063	11/19/2021	12.32	
NIL-064	11/19/2021	17.99	
NIL-065	11/19/2021	10.63	
NIL-066	11/19/2021	3.87	
NIL-067	11/29/2021	7.34	
NIL-068	--	--	Exempted
NIL-069	11/29/2021	13.32	
NIL-070	11/29/2021	19.74	
NIL-071	11/18/2021	4.59	
NIL-072	11/17/2021	2.87	
NIL-073	11/30/2021	4.99	
NIL-074	11/19/2021	205.52	Initial Monitoring
NIL-074	11/29/2021	5.36	First 10-Day Follow Up
NIL-075	11/19/2021	17.47	
NIL-076	11/19/2021	6.97	
NIL-077	11/19/2021	15.46	
NIL-078	11/29/2021	4.67	
NIL-079	--	--	Exempted
NIL-080	11/29/2021	29.18	Initial Monitoring
NIL-080	12/9/2021	16.39	First 10-Day Follow Up
NIL-081	--	--	Exempted
NIL-082	11/18/2021	6.33	

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Table 2. Integrated Surface Emissions Monitoring Results Newby Island Landfill, Milpitas, California

NIL-083	11/17/2021	2.99	
NIL-084	11/19/2021	6.40	
NIL-085	11/19/2021	4.24	
NIL-086	11/29/2021	14.31	
NIL-087	11/29/2021	3.57	
NIL-088	--	--	Exempted
NIL-089	--	--	Exempted
NIL-090	--	--	Exempted
NIL-091	11/18/2021	8.02	
NIL-092	11/17/2021	0.95	
NIL-093	11/17/2021	2.63	
NIL-094	11/19/2021	11.53	
NIL-095	11/19/2021	13.81	
NIL-096	11/29/2021	5.20	
NIL-097	11/29/2021	30.72	Initial Monitoring
NIL-097	12/9/2021	5.21	First 10-Day Follow Up
NIL-098	11/29/2021	18.09	
NIL-099	--	--	Exempted
NIL-100	--	--	Exempted
NIL-101	--	--	Exempted
NIL-102	11/18/2021	6.81	
NIL-103	11/17/2021	6.18	
NIL-104	11/19/2021	22.98	
NIL-105	11/29/2021	12.01	
NIL-106	11/29/2021	21.70	
NIL-107	11/29/2021	41.09	Initial Monitoring
NIL-107	12/9/2021	8.38	First 10-Day Follow Up
NIL-108	--	--	Exempted
NIL-109	--	--	Exempted
NIL-110	11/29/2021	13.56	
NIL-111	--	--	Exempted
NIL-112	11/18/2021	0.81	
NIL-113	11/17/2021	5.08	
NIL-114	11/17/2021	1.31	
NIL-115	11/19/2021	34.34	Initial Monitoring
NIL-115	11/29/2021	12.83	First 10-Day Follow Up
NIL-116	11/19/2021	10.02	
NIL-117	11/29/2021	11.45	
NIL-118	--	--	Exempted
NIL-119	--	--	Exempted
NIL-120	--	--	Active
NIL-121	11/15/2021	38.72	Initial Monitoring
NIL-121	11/24/2021	9.53	First 10-Day Follow Up
NIL-122	--	--	Exempted

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Table 2. Integrated Surface Emissions Monitoring Results Newby Island Landfill, Milpitas, California

NIL-123	11/18/2021	1.31	
NIL-124	11/17/2021	2.42	
NIL-125	11/17/2021	1.19	
NIL-126	11/19/2021	31.42	Initial Monitoring
NIL-126	11/29/2021	8.02	First 10-Day Follow Up
NIL-127	--	--	Exempted
NIL-128	--	--	Exempted
NIL-129	11/29/2021	49.49	Initial Monitoring
NIL-129	12/9/2021	8.35	First 10-Day Follow Up
NIL-130	--	--	Exempted
NIL-131	--	--	Active
NIL-132	11/15/2021	83.29	Initial Monitoring
NIL-132	11/24/2021	6.96	First 10-Day Follow Up
NIL-133	--	--	Exempted
NIL-134	11/18/2021	1.61	
NIL-135	11/17/2021	2.26	
NIL-136	11/17/2021	4.20	
NIL-137	--	--	Exempted
NIL-138	--	--	Exempted
NIL-139	11/29/2021	69.12	Initial Monitoring
NIL-139	12/9/2021	16.85	First 10-Day Follow Up
NIL-140	--	--	Active
NIL-141	--	--	Active
NIL-142	11/15/2021	64.56	Initial Monitoring
NIL-142	11/24/2021	32.24	First 10-Day Follow Up
NIL-142	12/3/2021	82.85	Second 10-Day Follow Up
NIL-143	11/15/2021	10.77	
NIL-144	11/18/2021	2.07	
NIL-145	11/17/2021	2.10	
NIL-146	11/17/2021	1.71	
NIL-147	--	--	Exempted
NIL-148	--	--	Exempted
NIL-149	--	--	Exempted
NIL-150	11/29/2021	31.87	Initial Monitoring
NIL-150	12/9/2021	12.11	First 10-Day Follow Up
NIL-151	11/15/2021	14.45	
NIL-152	--	--	Active
NIL-153	11/15/2021	74.86	Initial Monitoring
NIL-153	11/24/2021	66.99	First 10-Day Follow Up
NIL-153	12/3/2021	11.08	Second 10-Day Follow Up
NIL-154	11/15/2021	15.32	
NIL-155	11/18/2021	2.14	
NIL-155	11/29/2021	10.86	
NIL-156	11/17/2021	3.49	

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Table 2. Integrated Surface Emissions Monitoring Results Newby Island Landfill, Milpitas, California

NIL-157	11/17/2021	1.68	
NIL-158	--	--	Exempted
NIL-159	--	--	Exempted
NIL-160	11/29/2021	31.22	Initial Monitoring
NIL-160	12/9/2021	23.08	First 10-Day Follow Up
NIL-161	11/15/2021	41.40	Initial Monitoring
NIL-161	11/24/2021	7.04	First 10-Day Follow Up
NIL-162	--	--	Active
NIL-163	11/15/2021	105.43	Initial Monitoring
NIL-163	11/24/2021	90.13	First 10-Day Follow Up
NIL-163	12/3/2021	21.6	Second 10-Day Follow Up
NIL-164	11/15/2021	27.00	Initial Monitoring
NIL-164	11/24/2021	13.86	First 10-Day Follow Up
NIL-165	11/18/2021	1.51	
NIL-166	11/17/2021	1.66	
NIL-167	11/17/2021	1.46	
NIL-168	11/30/2021	9.72	
NIL-169	11/29/2021	10.26	
NIL-170	--	--	Exempted
NIL-171	11/30/2021	56.57	Initial Monitoring
NIL-171	12/9/2021	33.09	First 10-Day Follow Up
NIL-171	12/15/2021	21.92	Second 10-Day Follow Up
NIL-172	11/17/2021	31.48	Initial Monitoring
NIL-172	11/24/2021	67.95	First 10-Day Follow Up
NIL-172	12/3/2021	154.23	Second 10-Day Follow Up
NIL-173	--	--	Exempted
NIL-174	--	--	Active
NIL-175	11/17/2021	28.52	Initial Monitoring
NIL-175	11/24/2021	7.21	First 10-Day Follow Up
NIL-176	11/17/2021	8.17	
NIL-177	11/17/2021	1.39	
NIL-178	11/17/2021	2.65	
NIL-179	11/29/2021	2.91	
NIL-180	--	--	Exempted
NIL-181	11/30/2021	52.24	Initial Monitoring
NIL-181	12/9/2021	28.43	First 10-Day Follow Up
NIL-181	12/15/2021	18.07	Second 10-Day Follow Up
NIL-182	11/17/2021	56.60	Initial Monitoring
NIL-182	11/24/2021	70.64	First 10-Day Follow Up
NIL-182	12/3/2021	124.92	Second 10-Day Follow Up
NIL-183	11/29/2021	304.74	Initial Monitoring
NIL-183	12/9/2021	28.61	First 10-Day Follow Up
NIL-183	12/15/2021	36.22	Second 10-Day Follow Up
NIL-184	--	--	Active

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Table 2. Integrated Surface Emissions Monitoring Results Newby Island Landfill, Milpitas, California

NIL-185	--	--	Active
NIL-186	11/17/2021	11.94	
NIL-187	11/17/2021	1.25	
NIL-188	11/17/2021	4.38	
NIL-189	11/29/2021	3.81	
NIL-190	--	--	Exempted
NIL-191	--	--	Exempted
NIL-192	11/17/2021	82.24	Initial Monitoring
NIL-192	11/24/2021	70.11	First 10-Day Follow Up
NIL-192	12/3/2021	84.61	Second 10-Day Follow Up
NIL-193	11/24/2021	74.47	Initial Monitoring
NIL-193	12/3/2021	123.63	First 10-Day Follow Up
NIL-193	12/9/2021	49.36	Second 10-Day Follow Up
NIL-194	--	--	Active
NIL-195	--	--	Active
NIL-196	11/18/2021	5.42	
NIL-197	11/18/2021	3.39	
NIL-198	11/17/2021	3.96	
NIL-199	11/29/2021	3.05	
NIL-200	11/29/2021	4.08	
NIL-201	11/29/2021	9.19	
NIL-202	--	--	Exempted
NIL-203	11/15/2021	48.13	Initial Monitoring
NIL-203	11/24/2021	44.01	First 10-Day Follow Up
NIL-203	12/3/2021	144.91	Second 10-Day Follow Up
NIL-204	11/15/2021	136.27	Initial Monitoring
NIL-204	11/24/2021	34.93	First 10-Day Follow Up
NIL-204	12/3/2021	158.7	Second 10-Day Follow Up
NIL-205	--	--	Active
NIL-206	--	--	Active
NIL-207	11/18/2021	8.02	
NIL-208	11/18/2021	3.52	

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Table 2. Integrated Surface Emissions Monitoring Results Newby Island Landfill, Milpitas, California

NIL-209	11/18/2021	1.67	
NIL-210	11/29/2021	15.83	
NIL-211	--	--	Exempted
NIL-212	11/15/2021	39.14	Initial Monitoring
NIL-212	11/24/2021	54.68	First 10-Day Follow Up
NIL-212	12/3/2021	86.40	Second 10-Day Follow Up
NIL-213	11/15/2021	113.00	Initial Monitoring
NIL-213	11/24/2021	48.22	First 10-Day Follow Up
NIL-213	12/3/2021	145.56	Second 10-Day Follow Up
NIL-214	--	--	Active
NIL-215	--	--	Depression Storage
NIL-216	11/18/2021	6.51	
NIL-217	11/18/2021	4.40	
NIL-218	11/18/2021	1.78	
NIL-219	11/29/2021	11.56	
NIL-220	--	--	Exempted
NIL-221	11/29/2021	22.76	
NIL-222	11/15/2021	80.47	Initial Monitoring
NIL-222	11/24/2021	41.89	First 10-Day Follow Up
NIL-222	12/3/2021	69.76	Second 10-Day Follow Up
NIL-223	11/17/2021	47.11	Initial Monitoring
NIL-223	11/24/2021	73.99	First 10-Day Follow Up
NIL-223	12/3/2021	19.96	Second 10-Day Follow Up
NIL-224	--	--	Exempted
NIL-225	11/18/2021	3.10	
NIL-226	11/18/2021	4.80	
NIL-227	11/18/2021	1.49	
NIL-228	11/29/2021	8.38	
NIL-229	--	--	Exempted
NIL-230	11/29/2021	22.25	
NIL-231	11/15/2021	38.62	Initial Monitoring
NIL-231	11/24/2021	29.36	First 10-Day Follow Up
NIL-231	12/3/2021	19.55	Second 10-Day Follow Up
NIL-232	11/17/2021	28.01	Initial Monitoring
NIL-232	11/24/2021	45.80	First 10-Day Follow Up
NIL-232	12/3/2021	9.49	Second 10-Day Follow Up
NIL-233	11/30/2021	22.22	
NIL-234	--	--	Exempted
NIL-235	11/18/2021	5.39	
NIL-236	11/17/2021	2.74	
NIL-237	11/18/2021	2.75	
NIL-238	11/29/2021	6.43	
NIL-239	--	--	Exempted
NIL-240	--	--	Exempted

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Table 2. Integrated Surface Emissions Monitoring Results Newby Island Landfill, Milpitas, California

NIL-241	11/15/2021	31.43	Initial Monitoring
NIL-241	11/24/2021	20.92	First 10-Day Follow Up
NIL-242	--	--	Native
NIL-243	11/17/2021	2.87	
NIL-244	11/18/2021	3.47	
NIL-245	--	--	Exempted
NIL-246	11/29/2021	25.42	Initial Monitoring
NIL-246	12/9/2021	13.66	First 10-Day Follow Up
NIL-247	11/29/2021	41.49	Initial Monitoring
NIL-247	12/9/2021	11.49	First 10-Day Follow Up
NIL-248	--	--	Native
NIL-249	--	--	Native
NIL-250	11/29/2021	9.16	
NIL-251	11/29/2021	14.64	
NIL-252	11/29/2021	9.26	
NIL-253	11/29/2021	11.67	
NIL-254	11/29/2021	18.44	
NIL-255	--	--	Native
NIL-256	--	--	Native
NIL-257	11/18/2021	3.64	
NIL-258	--	--	Native
NIL-259	--	--	Native
NIL-260	--	--	Native
NIL-261	--	--	Native
NIL-262	11/18/2021	3.78	
NIL-263	--	--	Native
NIL-264	11/18/2021	2.85	
NIL-265	--	--	Native
NIL-266	11/18/2021	2.93	
NIL-267	--	--	Exempted
NIL-268	--	--	Exempted
NIL-269	--	--	Exempted
NIL-270	--	--	Exempted
NIL-271	--	--	Exempted
NIL-272	--	--	Exempted
NIL-273	--	--	Exempted
NIL-274	--	--	Exempted
NIL-275	--	--	Exempted
NIL-276	--	--	Exempted
NIL-277	--	--	Exempted



Attachment 5

Calibration Logs

**SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA**

Date: 11-16-21
Inspector(s): Michael M

Site Name: Newby
Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 2 MPH Wind Direction: SE Barometric Pressure: 30 "Hg
Air Temperature: 49 °F General Weather Conditions: cloudy

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 5415 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc. - Cal Gas Reading	Response Time (seconds)
1	<u>0</u>	<u>495</u>	<u>505</u>	<u>3</u>
2	<u>0</u>	<u>501</u>	<u>499</u>	<u>3</u>
3	<u>0</u>	<u>503</u>	<u>497</u>	<u>4</u>

Average Difference: 1.7
*Perform recalibration if average difference is greater than 10

Calibration Precision = Average Difference / Cal Gas Conc. X 100%

$$= 100\% \cdot \frac{1.7}{500} \times 100\% = 99.4\%$$

Span Sensitivity:

Trial 1:	Trial 3:
Counts Observed for the Span = <u>103640</u>	Counts Observed for the Span = <u>105916</u>
Counters Observed for the Zero = <u>6000</u>	Counters Observed for the Zero = <u>5201</u>
Trial 2:	
Counts Observed for the Span = <u>104308</u>	
Counters Observed for the Zero = <u>5503</u>	

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Entrance Reading: 1.2 ppm
Downwind Location Description: GRV 61 Reading: 1.6 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

**SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA**

Date: 11-15-21 Site Name: Newby
 Inspector(s): Liam M Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 2 MPH Wind Direction: SE Barometric Pressure: 30 "Hg
 Air Temperature: 49 °F General Weather Conditions: CLOUDY

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 1223 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>0</u>	<u>498</u>	<u>2</u>	<u>3</u>
2	<u>0</u>	<u>507</u>	<u>7</u>	<u>4</u>
3	<u>0</u>	<u>507</u>	<u>7</u>	<u>4</u>

Average Difference: 1.4
*Perform recalibration if average difference is greater than 10

Calibration Precision= Average Difference/Cal Gas Conc. X 100%

$$= 100\% \cdot \frac{1.4}{500} \times 100\% = 0.28\%$$

Span Sensitivity:

Trial 1:	Trial 3:
Counts Observed for the Span= <u>124124</u>	Counts Observed for the Span= <u>126464</u>
Counters Observed for the Zero= <u>4167</u>	Counters Observed for the Zero= <u>3437</u>
Trial 2:	
Counts Observed for the Span= <u>123236</u>	
Counters Observed for the Zero= <u>3463</u>	

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: ENTRANCE Reading: 1.2 ppm
 Downwind Location Description: 2ND 61 Reading: 1.6 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

**SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA**

Date: 11-15-21 Site Name: Anewby
 Inspector(s): Robert Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 2 MPH Wind Direction: SE Barometric Pressure: 30 "Hg
 Air Temperature: 49 °F General Weather Conditions: STORMY

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 1220 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	[Cal Gas Conc.-Cal Gas Reading]	Response Time (seconds)
1	<u>0.6</u>	<u>499</u>	<u>1</u>	<u>4</u>
2	<u>0.2</u>	<u>502</u>	<u>2</u>	<u>4</u>
3	<u>0.1</u>	<u>502</u>	<u>7</u>	<u>4</u>

Average Difference: 1.4
 *Perform recalibration if average difference is greater than 10

Calibration Precision= Average Difference/Cal Gas Conc. X 100%
 = 100% - 1.4 / 500 x 100%
 = 99.6 %

Span Sensitivity:

Trial 1:	Trial 3:
Counts Observed for the Span= <u>112336</u>	Counts Observed for the Span= <u>116728</u>
Counters Observed for the Zero= <u>4870</u>	Counters Observed for the Zero= <u>4632</u>
Trial 2:	
Counts Observed for the Span= <u>114923</u>	
Counters Observed for the Zero= <u>4130</u>	

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Enhance Reading: 1.2 ppm
 Downwind Location Description: grid 61 Reading: 1.6 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

SURFACE EMISSIONS MONITORING CALIBRATION AND PERTINENT DATA

Date: 11-15-21
Inspector(s): Michael M

Site Name: Newby
Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 4 MPH Wind Direction: NW Barometric Pressure: 30 "Hg
Air Temperature: 63 °F General Weather Conditions: CLOUDY

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 9419 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	1.7	506	6	1.5
2	1.7	502	5	1.5
3	1.7	501	4	1.5

Average Difference: 1.3
*Perform recalibration if average difference is greater than 10

Calibration Precision = Average Difference / Cal Gas Conc. X 100%

$$= 100\% - \frac{1.3}{500} \times 100\% = 49.7\%$$

Span Sensitivity:

Trial 1:	Trial 3:
Counts Observed for the Span = <u>106971</u>	Counts Observed for the Span = <u>108417</u>
Counters Observed for the Zero = <u>4867</u>	Counters Observed for the Zero = <u>4782</u>
Trial 2:	
Counts Observed for the Span = <u>107998</u>	
Counters Observed for the Zero = <u>4831</u>	

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Entrance Reading: 6.6 ppm
Downwind Location Description: grid 61 Reading: 1.7 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

SURFACE EMISSIONS MONITORING CALIBRATION AND PERTINENT DATA

Date: 11-15-21 Site Name: Newby
 Inspector(s): Liam M Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 4 MPH Wind Direction: NW Barometric Pressure: 30 "Hg
 Air Temperature: 63 °F General Weather Conditions: cloudy

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 1223 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>17</u>	<u>501</u>	<u>1</u>	<u>30</u>
2	<u>13</u>	<u>501</u>	<u>1</u>	<u>30</u>
3	<u>13</u>	<u>502</u>	<u>1</u>	<u>30</u>

Average Difference: 1.3
*Perform recalibration if average difference is greater than 10

Calibration Precision = Average Difference / Cal Gas Conc. X 100%

$$= 100\% - \frac{1.3}{500} \times 100\% = 99.7\%$$

Span Sensitivity:

Trial 1:	Trial 3:
Counts Observed for the Span= <u>127921</u>	Counts Observed for the Span= <u>129331</u>
Counters Observed for the Zero= <u>3273</u>	Counters Observed for the Zero= <u>3251</u>
Trial 2:	
Counts Observed for the Span= <u>128993</u>	
Counters Observed for the Zero= <u>3260</u>	

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Entrance Reading: 1.1 ppm
 Downwind Location Description: grid 6 Reading: 1.7 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

SURFACE EMISSIONS MONITORING CALIBRATION AND PERTINENT DATA

Date: 11-15-21 Site Name: Newby
 Inspector(s): Robert Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 4 MPH Wind Direction: NW Barometric Pressure: 30 "Hg
 Air Temperature: 63 °F General Weather Conditions: Cloudy

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 220 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>.1</u>	<u>499</u>	<u>1</u>	<u>3.5</u>
2	<u>.1</u>	<u>501</u>	<u>1</u>	<u>3.5</u>
3	<u>.2</u>	<u>501</u>	<u>1</u>	<u>3.5</u>

Average Difference: 1
*Perform recalibration if average difference is greater than 10

Calibration Precision = Average Difference / Cal Gas Conc. X 100%

$$= 100\% - \frac{1}{500} \times 100\%$$

$$= 99.8\%$$

Span Sensitivity:

Trial 1:	Trial 2:	Trial 3:
Counts Observed for the Span= <u>117811</u>	Counts Observed for the Span= <u>118723</u>	Counts Observed for the Span= <u>119843</u>
Counters Observed for the Zero= <u>4290</u>	Counters Observed for the Zero= <u>4272</u>	Counters Observed for the Zero= <u>4263</u>

Post Monitoring Calibration Check

Zero Air Reading: 9 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Entrance Reading: 11 ppm
 Downwind Location Description: Unit 61 Reading: 17 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

**SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA**

Date: 11-17-21 Site Name: NEWBY
 Inspector(s): Michael M Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 1 MPH Wind Direction: N Barometric Pressure: 30 "Hg
 Air Temperature: 50 °F General Weather Conditions: Clear

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 5419 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>.0</u>	<u>500</u>	<u>0</u>	<u>4</u>
2	<u>.1</u>	<u>503</u>	<u>3</u>	<u>3</u>
3	<u>0</u>	<u>500</u>	<u>0</u>	

Average Difference: .1
*Perform recalibration if average difference is greater than 10

Calibration Precision= Average Difference/Cal Gas Conc. X 100%

$$= 100\% - \frac{.1}{500} \times 100\% = 99.8\%$$

Span Sensitivity:

Trial 1:	Counts Observed for the Span= <u>101736</u>	Trial 3:	Counts Observed for the Span= <u>105740</u>
	Counters Observed for the Zero= <u>5363</u>		Counters Observed for the Zero= <u>4881</u>
Trial 2:	Counts Observed for the Span= <u>105688</u>		
	Counters Observed for the Zero= <u>5222</u>		

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Entrance Reading: 1.2 ppm
 Downwind Location Description: Grid 61 Reading: 1.6 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

**SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA**

gms

Date: 11-17-21
Inspector(s): Michael M

Site Name: Neway
Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 5 MPH Wind Direction: NW Barometric Pressure: 30 "Hg
Air Temperature: 64 °F General Weather Conditions: Clear

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 5415 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc - Cal Gas Reading	Response Time (seconds)
1	<u>1</u>	<u>501</u>	<u>1</u>	<u>15</u>
2	<u>1</u>	<u>500</u>	<u>1</u>	<u>15</u>
3	<u>1</u>	<u>501</u>	<u>1</u>	<u>15</u>

Average Difference: 1
*Perform recalibration if average difference is greater than 10

Calibration Precision = Average Difference / Cal Gas Conc. X 100%

$$= \frac{100\% - 1}{500} \times 100\% = 0.2\%$$

Span Sensitivity:

Trial 1:	Trial 3:
Counts Observed for the Span = <u>106997</u>	Counts Observed for the Span = <u>108627</u>
Counters Observed for the Zero = <u>4897</u>	Counters Observed for the Zero = <u>4872</u>
Trial 2:	
Counts Observed for the Span = <u>107187</u>	
Counters Observed for the Zero = <u>4886</u>	

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Entrance Reading: 1.1 ppm
Downwind Location Description: Grid 61 Reading: 1.7 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

**SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA**

Date: 11-17-21 Site Name: Newby
 Inspector(s): Bryan O Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 1 MPH Wind Direction: N Barometric Pressure: 30 "Hg
 Air Temperature: 59 °F General Weather Conditions: clear

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 1219 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>0</u>	<u>500</u>	<u>0</u>	<u>35</u>
2	<u>0</u>	<u>500</u>	<u>0</u>	<u>35</u>
3	<u>0</u>	<u>499</u>	<u>1</u>	<u>35</u>

Average Difference: .3
 *Perform recalibration if average difference is greater than 10

Calibration Precision= Average Difference/Cal Gas Conc. X 100%
 = 100% - .3 / 500 x 100%
 = 99.9 %

Span Sensitivity:

Trial 1:	Trial 2:	Trial 3:
Counts Observed for the Span= <u>110648</u>	Counts Observed for the Span= <u>103224</u>	Counts Observed for the Span= <u>112268</u>
Counters Observed for the Zero= <u>3823</u>	Counters Observed for the Zero= <u>3508</u>	Counters Observed for the Zero= <u>3148</u>

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Entrance Reading: 1.2 ppm
 Downwind Location Description: Grid 61 Reading: 1.5 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

POST

SURFACE EMISSIONS MONITORING CALIBRATION AND PERTINENT DATA

Date: 11-17-21
Inspector(s): BRYAN O

Site Name: NEWBY
Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 5 MPH
Wind Direction: NW
Barometric Pressure: 30 "Hg
Air Temperature: 64 °F
General Weather Conditions: Clear

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 016 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc. - Cal Gas Reading	Response Time (seconds)
1	<u>1</u>	<u>509</u>	<u>9</u>	<u>3</u>
2	<u>1</u>	<u>506</u>	<u>6</u>	<u>3</u>
3	<u>1</u>	<u>502</u>	<u>2</u>	<u>4</u>

Average Difference: 1

*Perform recalibration if average difference is greater than 10

Calibration Precision = Average Difference / Cal Gas Conc. X 100%

$$= \frac{100\% - 1}{500} \times 100\%$$

$$= 0.2\%$$

Span Sensitivity:

Trial 1:	Counts Observed for the Span=	Counters Observed for the Zero=
	<u>113011</u>	<u>3562</u>
Trial 2:	Counts Observed for the Span=	Counters Observed for the Zero=
	<u>114817</u>	<u>3548</u>

Trial 3:	Counts Observed for the Span=	Counters Observed for the Zero=
	<u>115831</u>	<u>3522</u>

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm
Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: FRANCE Reading: 1.1 ppm
Downwind Location Description: GRID 6 Reading: 1.7 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

**SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA**

Date: 11-17-21 Site Name: Newby
 Inspector(s): Liam M Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 1 MPH Wind Direction: N Barometric Pressure: 30 "Hg
 Air Temperature: 50 °F General Weather Conditions: Clear

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: (223) Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>0</u>	<u>502</u>	<u>2</u>	<u>15</u>
2	<u>-1</u>	<u>500</u>	<u>0</u>	
3	<u>0</u>	<u>499</u>	<u>1</u>	

Average Difference: 1

*Perform recalibration if average difference is greater than 10

Calibration Precision= Average Difference/Cal Gas Conc. X 100%

$$= 100\% \cdot \frac{1}{500} \times 100\% = 99.8\%$$

Span Sensitivity:

Trial 1:	Trial 2:	Trial 3:
Counts Observed for the Span= <u>118028</u>	Counts Observed for the Span= <u>120024</u>	Counts Observed for the Span= <u>118892</u>
Counters Observed for the Zero= <u>3317</u>	Counters Observed for the Zero= <u>2912</u>	Counters Observed for the Zero= <u>2885</u>

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Entrance Reading: 1.2 ppm
 Downwind Location Description: 9/16 Reading: 1.6 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

**SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA**

PSJ

Date: 11-17-21
Inspector(s): Liam M

Site Name: Newry
Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 5 MPH Wind Direction: NW Barometric Pressure: 30 "Hg
Air Temperature: 64 °F General Weather Conditions: Clear

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 1223 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>11</u>	<u>500</u>	<u>9</u>	<u>3</u>
2	<u>11</u>	<u>498</u>	<u>2</u>	<u>3</u>
3	<u>11</u>	<u>498</u>	<u>2</u>	<u>3</u>

Average Difference: 1
*Perform recalibration if average difference is greater than 10

Calibration Precision = Average Difference / Cal Gas Conc. X 100%
= 100% - 1 / 500 x 100%
= 0.2%

Span Sensitivity:

Trial 1:	Trial 2:	Trial 3:
Counts Observed for the Span= <u>101210</u>	Counts Observed for the Span= <u>121032</u>	Counts Observed for the Span= <u>121032</u>
Counters Observed for the Zero= <u>3054</u>	Counters Observed for the Zero= <u>3051</u>	Counters Observed for the Zero= <u>3071</u>
Counts Observed for the Span= <u>120081</u>		
Counters Observed for the Zero= <u>3040</u>		

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Entrance Reading: 1.1 ppm
Downwind Location Description: Grid 61 Reading: 1.7 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

**SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA**

Date: 11-17-21
Inspector(s): Robert

Site Name: NEWSY
Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 1 MPH Wind Direction: N Barometric Pressure: 30 "Hg
Air Temperature: 50 °F General Weather Conditions: Clear

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 1270 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>2</u>	<u>500</u>	<u>0</u>	<u>3</u>
2	<u>2</u>	<u>498</u>	<u>2</u>	<u>2</u>
3	<u>1</u>	<u>500</u>	<u>0</u>	<u>3</u>

Average Difference: .6
*Perform recalibration if average difference is greater than 10

Calibration Precision= Average Difference/Cal Gas Conc. X 100%

$$= 100\% \cdot \frac{.6}{500} \times 100\%$$

$$= 99.8\%$$

Span Sensitivity:

Trial 1:	Trial 3:
Counts Observed for the Span= <u>106440</u>	Counts Observed for the Span= <u>113264</u>
Counters Observed for the Zero= <u>4367</u>	Counters Observed for the Zero= <u>3784</u>
Trial 2:	
Counts Observed for the Span= <u>108628</u>	
Counters Observed for the Zero= <u>3251</u>	

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Entrance Reading: 1.2 ppm
Downwind Location Description: Grid 61 Reading: 1.6 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

SURFACE EMISSIONS MONITORING CALIBRATION AND PERTINENT DATA

POST

Date: 11-17-21
Inspector(s): Robert

Site Name: Newby
Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 5 MPH Wind Direction: NW Barometric Pressure: 30 "Hg
Air Temperature: 64 °F General Weather Conditions: Cloudy

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 1270 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>5</u>	<u>500</u>	<u>0</u>	<u>1</u>
2	<u>5</u>	<u>501</u>	<u>1</u>	<u>1</u>
3	<u>5</u>	<u>498</u>	<u>2</u>	<u>1</u>

Average Difference: 1
*Perform recalibration if average difference is greater than 10

Calibration Precision= Average Difference/Cal Gas Conc. X 100%

$$= \frac{100\% - \frac{1}{500} \times 100\%}{500} \times 100\%$$

$$= 0.2\%$$

Span Sensitivity:

Trial 1:	Trial 3:
Counts Observed for the Span= <u>114867</u>	Counts Observed for the Span= <u>116421</u>
Counters Observed for the Zero= <u>7382</u>	Counters Observed for the Zero= <u>3242</u>
Trial 2:	
Counts Observed for the Span= <u>115086</u>	
Counters Observed for the Zero= <u>7760</u>	

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Entrance Reading: 1.1 ppm
Downwind Location Description: Grid 61 Reading: 1.7 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

SURFACE EMISSIONS MONITORING CALIBRATION AND PERTINENT DATA

Date: 11-17-21 Site Name: Newly
 Inspector(s): [Signature] Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 1 MPH Wind Direction: N Barometric Pressure: 30 "Hg
 Air Temperature: 50 °F General Weather Conditions: Clear

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 5420 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>.0</u>	<u>501</u>	<u>1</u>	<u>3</u>
2	<u>.0</u>	<u>501</u>	<u>1</u>	<u>3</u>
3	<u>.0</u>	<u>499</u>	<u>1</u>	<u>4</u>

Average Difference: 1

*Perform recalibration if average difference is greater than 10

Calibration Precision= Average Difference/Cal Gas Conc. X 100%

$$= 100\% - \frac{1}{500} \times 100\% = 99.8\%$$

Span Sensitivity:

Trial 1:	Trial 3:
Counts Observed for the Span= <u>120964</u>	Counts Observed for the Span= <u>124004</u>
Counters Observed for the Zero= <u>4440</u>	Counters Observed for the Zero= <u>3856</u>
Trial 2:	
Counts Observed for the Span= <u>119860</u>	
Counters Observed for the Zero= <u>4189</u>	

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Entrance Reading: 1.2 ppm
 Downwind Location Description: Grid 61 Reading: 1.6 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

POST

SURFACE EMISSIONS MONITORING CALIBRATION AND PERTINENT DATA

Date: 1/7/21 Site Name: Noway
Inspector(s): Don G Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 5 MPH Wind Direction: NW Barometric Pressure: 30 "Hg
Air Temperature: 64 °F General Weather Conditions: Clear

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 5470 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>1</u>	<u>501</u>	<u>1</u>	<u>1.5</u>
2	<u>1</u>	<u>499</u>	<u>1</u>	<u>1.5</u>
3	<u>1</u>	<u>498</u>	<u>1</u>	<u>1.5</u>

Average Difference: 1.0
*Perform recalibration if average difference is greater than 10

Calibration Precision = Average Difference / Cal Gas Conc. X 100%

$$= \frac{1.0}{500} \times 100\% = 0.2\%$$

Span Sensitivity:

Trial 1:	Trial 3:
Counts Observed for the Span = <u>25869</u>	Counts Observed for the Span = <u>27036</u>
Counters Observed for the Zero = <u>3947</u>	Counters Observed for the Zero = <u>3913</u>
Trial 2:	
Counts Observed for the Span = <u>26541</u>	
Counters Observed for the Zero = <u>3930</u>	

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Entrance Grid 61 Reading: 1.1 ppm
Downwind Location Description: Grid 61 Reading: 1.7 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

Pre

SURFACE EMISSIONS MONITORING CALIBRATION AND PERTINENT DATA

Date: 11-18-21
Inspector(s): Bryano

Site Name: Newby
Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 1 MPH Wind Direction: SSE Barometric Pressure: 30.09 "Hg
Air Temperature: 48 °F General Weather Conditions: Cloudy

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 1215 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>.2</u>	<u>501</u>	<u>1</u>	<u>4</u>
2	<u>.2</u>	<u>500</u>	<u>0</u>	<u>3</u>
3	<u>0</u>	<u>500</u>		

Average Difference:
 *Perform recalibration if average difference is greater than 10

Calibration Precision= Average Difference/Cal Gas Conc. X 100%

= 100%- /500 x 100%

= %

Span Sensitivity:

Trial 1:	Trial 3:
Counts Observed for the Span= <u>101372</u>	Counts Observed for the Span= <u>107112</u>
Counters Observed for the Zero= <u>3662</u>	Counters Observed for the Zero= <u>3302</u>
Trial 2:	
Counts Observed for the Span= <u>105272</u>	
Counters Observed for the Zero= <u>99760 3386</u>	

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Entrance Reading: 1.2 ppm
Downwind Location Description: grid 61 Reading: 1.6 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

**SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA**

POST

Date: 11-18-21
Inspector(s): BRYAN J

Site Name: NEWBY
Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 4 MPH Wind Direction: N Barometric Pressure: 30 "Hg
Air Temperature: 61 °F General Weather Conditions: CLOUDY

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 1219 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc. - Cal Gas Reading	Response Time (seconds)
1	<u>0</u>	<u>498</u>	<u>2</u>	<u>3</u>
2	<u>0</u>	<u>500</u>	<u>0</u>	<u>4</u>
3	<u>0</u>	<u>500</u>	<u>0</u>	<u>4</u>

Average Difference: 1
*Perform recalibration if average difference is greater than 10

Calibration Precision = Average Difference / Cal Gas Conc. X 100%

$$= \frac{100\% - 1}{500} \times 100\%$$

$$= 99.8\%$$

Span Sensitivity:

Trial 1:	Trial 2:	Trial 3:
Counts Observed for the Span = <u>108840</u>	Counts Observed for the Span = <u>109720</u>	Counts Observed for the Span = <u>110637</u>
Counters Observed for the Zero = <u>2922</u>	Counters Observed for the Zero = <u>2907</u>	Counters Observed for the Zero = <u>2892</u>

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: ENTRANCE Reading: 1.1 ppm
Downwind Location Description: GRIP 61 Reading: 1.7 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

Pre

SURFACE EMISSIONS MONITORING CALIBRATION AND PERTINENT DATA

Date: 11-18-21

Site Name: Newby

Inspector(s): Robert M

Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 1 MPH

Wind Direction: SSE

Barometric Pressure: 30.09 "Hg

Air Temperature: 48 °F

General Weather Conditions: cloudy

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 1220

Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>0</u>	<u>502</u>	<u>2</u>	<u>4</u>
2	<u>.1</u>	<u>501</u>	<u>1</u>	<u>4</u>
3	<u>.1</u>	<u>500</u>	<u>0</u>	<u>0</u>

Average Difference:

*Perform recalibration if average difference is greater than 10

Calibration Precision= Average Difference/Cal Gas Conc. X 100%

= 100% - / 500 x 100%

= %

Span Sensitivity:

Trial 1:
 Counts Observed for the Span= 100832
 Counters Observed for the Zero= 4199

Trial 3:
 Counts Observed for the Span= 109740
 Counters Observed for the Zero= 3966

Trial 2:
 Counts Observed for the Span= 109168
 Counters Observed for the Zero= 3964

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm

Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Entrance
 Downwind Location Description: grid 61

Reading: 1.2 ppm
 Reading: 1.6 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

**SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA**

POST

Date: 11-18-21
Inspector(s): Robert M

Site Name: Newby
Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 4 MPH Wind Direction: N Barometric Pressure: 30 "Hg
Air Temperature: 61 °F General Weather Conditions: CLOUDY

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 1270 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>1</u>	<u>580</u>	<u>9</u>	<u>2.5</u>
2	<u>1</u>	<u>581</u>	<u>9</u>	<u>2.5</u>
3	<u>1</u>	<u>581</u>	<u>9</u>	<u>2.5</u>

Average Difference: 9
*Perform recalibration if average difference is greater than 10

Calibration Precision = Average Difference / Cal Gas Conc. X 100%

$$= 100\% \cdot \frac{9}{500} \times 100\%$$

$$= 18.0\%$$

Span Sensitivity:

Trial 1:	Counts Observed for the Span= <u>110982</u>	Trial 3:	Counts Observed for the Span= <u>112672</u>
	Counters Observed for the Zero= <u>7842</u>		Counters Observed for the Zero= <u>3870</u>
Trial 2:	Counts Observed for the Span= <u>11803</u>		
	Counters Observed for the Zero= <u>7875</u>		

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Entrance Reading: 1.1 ppm
Downwind Location Description: Grid 61 Reading: 1.7 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

Dre

SURFACE EMISSIONS MONITORING CALIBRATION AND PERTINENT DATA

Date: 11-18-21

Site Name: Newby

Inspector(s): Liam M

Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 1 MPH

Wind Direction: SSE

Barometric Pressure: 30.09 "Hg

Air Temperature: 48 °F

General Weather Conditions: cloudy

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 1223

Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>.3</u>	<u>503</u>	<u>3</u>	<u>15</u>
2	<u>.0</u>	<u>499</u>	<u>1</u>	<u>15</u>
3	<u>0</u>	<u>500</u>	<u>0</u>	

Average Difference: 1.3

*Perform recalibration if average difference is greater than 10

Calibration Precision= Average Difference/Cal Gas Conc. X 100%

$$= 100\% - \frac{1.3}{500} \times 100\%$$

$$= 99.7\%$$

Span Sensitivity:

Trial 1:	Counts Observed for the Span= <u>115148</u>
	Counters Observed for the Zero= <u>3671</u>
Trial 2:	Counts Observed for the Span= <u>118740</u>
	Counters Observed for the Zero= <u>3296</u>

Trial 3:	Counts Observed for the Span= <u>118132</u>
	Counters Observed for the Zero= <u>3082</u>

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm

Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Entrance

Reading: 1.2 ppm

Downwind Location Description: Exit 61

Reading: 1.6 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

**SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA**

PAST

Date: 11-18-21
Inspector(s): Liam M

Site Name: Norby
Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 4 MPH Wind Direction: N Barometric Pressure: 30 "Hg
Air Temperature: 61 °F General Weather Conditions: cloudy

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 1223 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>0</u>	<u>503</u>	<u>3</u>	<u>3</u>
2	<u>0</u>	<u>501</u>	<u>1</u>	<u>3</u>
3	<u>0</u>	<u>500</u>	<u>0</u>	<u>3</u>

Average Difference: 1.3
*Perform recalibration if average difference is greater than 10

Calibration Precision= Average Difference/Cal Gas Conc. X 100%

$$= \frac{100\% - 1.3}{500} \times 100\%$$

$$= 99.7\%$$

Span Sensitivity:

Trial 1:	Counts Observed for the Span= <u>119210</u>
	Counters Observed for the Zero= <u>3011</u>
Trial 2:	Counts Observed for the Span= <u>140831</u>
	Counters Observed for the Zero= <u>2987</u>

Trial 3:	Counts Observed for the Span= <u>121847</u>
	Counters Observed for the Zero= <u>2063</u>

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Entrance Reading: 1.1 ppm
Downwind Location Description: gnd 61 Reading: 1.7 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

RVC

SURFACE EMISSIONS MONITORING CALIBRATION AND PERTINENT DATA

Date: 11-18-21

Site Name: Newby

Inspector(s): Michaem

Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 1 MPH

Wind Direction: SSE

Barometric Pressure: 3009 "Hg

Air Temperature: 48 °F

General Weather Conditions: cloudy

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 5415

Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	0	499	1	3
2	-0	498	2	4
3	.1	500	0	3

Average Difference: 1

*Perform recalibration if average difference is greater than 10

Calibration Precision= Average Difference/Cal Gas Conc. X 100%

$$= 100\% - \frac{1}{500} \times 100\%$$

$$= 99.8\%$$

Span Sensitivity:

Trial 1:	Counts Observed for the Span= <u>95136</u>
	Counters Observed for the Zero= <u>5783</u>
Trial 2:	Counts Observed for the Span= <u>9760</u>
	Counters Observed for the Zero= <u>5367</u>

Trial 3:	Counts Observed for the Span= <u>99836</u>
	Counters Observed for the Zero= <u>5074</u>

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm

Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Entrance
Downwind Location Description: Grid 61

Reading: 1.2 ppm
Reading: 1.6 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

**SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA**

POST

Date: 11-18-21
Inspector(s): Michael M

Site Name: Newby
Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 4 MPH Wind Direction: N Barometric Pressure: 30 "Hg
Air Temperature: 61 °F General Weather Conditions: cloudy

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 5415 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>4</u>	<u>501</u>	<u>1</u>	<u>3</u>
2	<u>0</u>	<u>502</u>	<u>1</u>	<u>4</u>
3	<u>0</u>	<u>501</u>	<u>1</u>	<u>4</u>

Average Difference: 1.3
*Perform recalibration if average difference is greater than 10

Calibration Precision= Average Difference/Cal Gas Conc. X 100%

$$= \frac{100\% \cdot 1.3}{500} \times 100\% = 0.26\%$$

Span Sensitivity:

Trial 1:	Counts Observed for the Span= <u>102338</u>	Trial 3:	Counts Observed for the Span= <u>94074</u>
	Counters Observed for the Zero= <u>4286</u>		Counters Observed for the Zero= <u>4161</u>
Trial 2:	Counts Observed for the Span= <u>103928</u>		
	Counters Observed for the Zero= <u>4273</u>		

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Entrance Reading: 1.1 ppm
Downwind Location Description: grid 61 Reading: 1.7 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

**SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA**

Date: 11-24-21 Site Name: NEWBY
 Inspector(s): Michael M Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 7 MPH Wind Direction: NNE Barometric Pressure: 30 "Hg
 Air Temperature: 52 °F General Weather Conditions: Clear

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 5415 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>50</u>	<u>501</u>	<u>1</u>	<u>3</u>
2	<u>50</u>	<u>500</u>	<u>1</u>	<u>3</u>
3	<u>50</u>	<u>500</u>	<u>1</u>	<u>3</u>

Average Difference:
 *Perform recalibration if average difference is greater than 10

Calibration Precision= Average Difference/Cal Gas Conc. X 100%
 = 100% - 1.8 / 500 x 100%
 = 0.36%

Span Sensitivity:

Trial 1:	Counts Observed for the Span= <u>98644</u>	Trial 3:	Counts Observed for the Span= <u>101300</u>
	Counters Observed for the Zero= <u>5057</u>		Counters Observed for the Zero= <u>5029</u>
Trial 2:	Counts Observed for the Span= <u>97936</u>		
	Counters Observed for the Zero= <u>5079</u>		

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Environment Reading: 1.2 ppm
 Downwind Location Description: Grid 61 Reading: 1.6 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

**SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA**

Date: 11-24-21
Inspector(s): Liam M

Site Name: Newby
Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 7 MPH Wind Direction: NNE Barometric Pressure: 30 "Hg
Air Temperature: 52 °F General Weather Conditions: Clear

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 1223 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>0</u>	<u>500</u>	<u>0</u>	<u>2</u>
2	<u>0</u>	<u>500</u>	<u>0</u>	<u>2</u>
3	<u>0</u>	<u>500</u>	<u>0</u>	<u>2</u>

Average Difference: 0
*Perform recalibration if average difference is greater than 10

Calibration Precision= Average Difference/Cal Gas Conc. X 100%

$$= \frac{100\% - 0}{500} \times 100\% = 0\%.$$

Span Sensitivity:

Trial 1:	Trial 3:
Counts Observed for the Span= <u>17932</u>	Counts Observed for the Span= <u>17468</u>
Counters Observed for the Zero= <u>3061</u>	Counters Observed for the Zero= <u>3155</u>
Trial 2:	
Counts Observed for the Span= <u>17436</u>	
Counters Observed for the Zero= <u>3102</u>	

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Entrance Reading: 1.2 ppm
Downwind Location Description: Grid 61 Reading: 1.0 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

**SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA**

Date: 11-24-21 Site Name: NEWBY
 Inspector(s): ROGORA Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 7 MPH Wind Direction: NNE Barometric Pressure: 30 "Hg
 Air Temperature: 52 °F General Weather Conditions: Clear

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 1210 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>1.5</u>	<u>495</u>	<u>4</u>	<u>4.5</u>
2	<u>1.6</u>	<u>494</u>	<u>4</u>	<u>4.5</u>
3	<u>1.6</u>	<u>494</u>	<u>4</u>	<u>4.5</u>

Average Difference: 1
 *Perform recalibration if average difference is greater than 10

Calibration Precision= Average Difference/Cal Gas Conc. X 100%
 = 100% - 1 / 500 x 100%
 = 0.2%

Span Sensitivity:

Trial 1:	Counts Observed for the Span= <u>106876</u>	Trial 3:	Counts Observed for the Span= <u>108216</u>
	Counters Observed for the Zero= <u>3974</u>		Counters Observed for the Zero= <u>4073</u>
Trial 2:	Counts Observed for the Span= <u>110246</u>		
	Counters Observed for the Zero= <u>3976</u>		

Post Monitoring Calibration Check

Zero Air Reading: ~~1.0 RM~~ ppm Cal Gas Reading: 580 ppm
~~1.0 RM~~ ppm 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Entrance Reading: 1.2 ppm
 Downwind Location Description: Exit Reading: 1.0 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

**SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA**

Date: 11-24-21 Site Name: Newby
 Inspector(s): Michael M Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 9 MPH Wind Direction: NNE Barometric Pressure: 30 "Hg
 Air Temperature: 66 °F General Weather Conditions: clear

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 9465 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>1.2</u>	<u>500</u>	<u>9</u>	<u>3</u>
2	<u>1.2</u>	<u>500</u>	<u>9</u>	<u>3</u>
3	<u>1.2</u>	<u>500</u>	<u>9</u>	<u>3</u>

Average Difference: 1
*Perform recalibration if average difference is greater than 10

Calibration Precision= Average Difference/Cal Gas Conc. X 100%

$$= \frac{100\% - \frac{1}{500} \times 100\%}{100} = 99.8\%$$

Span Sensitivity:

Trial 1:	Trial 3:
Counts Observed for the Span= <u>103475</u>	Counts Observed for the Span= <u>105921</u>
Counters Observed for the Zero= <u>4876</u>	Counters Observed for the Zero= <u>4402</u>
Trial 2:	
Counts Observed for the Span= <u>104871</u>	
Counters Observed for the Zero= <u>4634</u>	

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Entrance Grid 61 Reading: 1.2 ppm
 Downwind Location Description: Grid 61 Reading: 1.6 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

**SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA**

Date: 11-29-21 Site Name: NEWBY
 Inspector(s): Liam M Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 9 MPH Wind Direction: NNE Barometric Pressure: 30 "Hg
 Air Temperature: 66 °F General Weather Conditions: Clear

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 1223 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc. - Cal Gas Reading	Response Time (seconds)
1	<u>0</u>	<u>501</u>	<u>1</u>	<u>2</u>
2	<u>0</u>	<u>504</u>	<u>4</u>	<u>2</u>
3	<u>0</u>	<u>500</u>	<u>0</u>	<u>2</u>

Average Difference: 1.7
 *Perform recalibration if average difference is greater than 10

Calibration Precision = Average Difference / Cal Gas Conc. X 100%

$$= 100\% \cdot \frac{1.7}{500} \times 100\% = 0.34\%$$

Span Sensitivity:

Trial 1:	Trial 3:
Counts Observed for the Span = <u>118964</u>	Counts Observed for the Span = <u>120983</u>
Counters Observed for the Zero = <u>2874</u>	Counters Observed for the Zero = <u>2841</u>
Trial 2:	
Counts Observed for the Span = <u>119711</u>	
Counters Observed for the Zero = <u>2853</u>	

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Entrance Reading: 1.7 ppm
 Downwind Location Description: 041261 Reading: 1.7 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

**SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA**

Date: 11-24-21 Site Name: Newby
 Inspector(s): Robert Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 9 MPH Wind Direction: NNE Barometric Pressure: 30 "Hg
 Air Temperature: 66 °F General Weather Conditions: Clear

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 1730 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc. - Cal Gas Reading	Response Time (seconds)
1	<u>11</u>	<u>500</u>	<u>489</u>	<u>3</u>
2	<u>11</u>	<u>500</u>	<u>489</u>	<u>3</u>
3	<u>11</u>	<u>502</u>	<u>491</u>	<u>3</u>

Average Difference: 1

*Perform recalibration if average difference is greater than 10

Calibration Precision = Average Difference / Cal Gas Conc. X 100%

$$= 100\% - \frac{1}{500} \times 100\%$$

$$= \quad \quad \quad \%$$

Span Sensitivity:

Trial 1:	Trial 3:
Counts Observed for the Span= _____	Counts Observed for the Span= _____
Counters Observed for the Zero= _____	Counters Observed for the Zero= _____
Trial 2:	
Counts Observed for the Span= _____	
Counters Observed for the Zero= _____	

Post Monitoring Calibration Check

Zero Air Reading: _____ ppm Cal Gas Reading: _____ ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: _____ Reading: _____ ppm
 Downwind Location Description: _____ Reading: _____ ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

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SURFACE EMISSIONS MONITORING CALIBRATION AND PERTINENT DATA

Date: 11-29-21 Site Name: Newby
Inspector(s): Bryan O Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 1 MPH Wind Direction: SSE Barometric Pressure: 30.18 "Hg
Air Temperature: 48 °F General Weather Conditions: Sunny

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 1215 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>.2</u>	<u>499</u>	<u>1</u>	
2	<u>.2</u>	<u>499</u>	<u>1</u>	
3	<u>.2</u>	<u>498</u>	<u>2</u>	

Average Difference: 1.3
*Perform recalibration if average difference is greater than 10

Calibration Precision = Average Difference / Cal Gas Conc. X 100%

$$= 100\% \cdot \frac{1.3}{500} \times 100\%$$

$$= 99.7\%$$

Span Sensitivity:

Trial 1:	Trial 2:	Trial 3:
Counts Observed for the ^{zero} Span = <u>3329</u>	Counts Observed for the Span = <u>114060</u>	Counts Observed for the Span = <u>109048</u>
Counters Observed for the ^{span} Zero = <u>102528</u>	Counters Observed for the Zero = <u>3255</u>	Counters Observed for the Zero = <u>3375</u>

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: entrance Reading: 1.2 ppm
Downwind Location Description: Grnd 61 Reading: 1.6 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

Pre

SURFACE EMISSIONS MONITORING CALIBRATION AND PERTINENT DATA

Date: 11-29-21
Inspector(s): Robert M

Site Name: Newby
Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 1 MPH Wind Direction: SSE Barometric Pressure: 30.18 "Hg
Air Temperature: 48 °F General Weather Conditions: Sunny

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument's reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 12A1 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>.2</u>	<u>502</u>	<u>2</u>	
2	<u>.0</u>	<u>498</u>	<u>2</u>	
3	<u>.0</u>	<u>499</u>	<u>1</u>	

Average Difference: 1.3
*Perform recalibration if average difference is greater than 10

Calibration Precision = Average Difference / Cal Gas Conc. X 100%

$$= 100\% - \frac{1.3}{500} \times 100\%$$

$$= 99.7\%$$

Span Sensitivity:

Trial 1:	Counts Observed for the Span = <u>118656</u>
	Counters Observed for the Zero = <u>4281</u>
Trial 2:	Counts Observed for the Span = <u>134064</u>
	Counters Observed for the Zero = <u>4257</u>

Trial 3:	Counts Observed for the Span = <u>134140</u>
	Counters Observed for the Zero = <u>4247</u>

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Entrance Reading: 1.7 ppm
Downwind Location Description: Grnd 61 Reading: 1.6 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.



Pre

SURFACE EMISSIONS MONITORING CALIBRATION AND PERTINENT DATA

Date: 11-29-21 Site Name: Newby
Inspector(s): Liam M Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 48 MPH Wind Direction: SSE Barometric Pressure: 30.18 "Hg
Air Temperature: 48 °F General Weather Conditions: Sunny

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 1223 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>.0</u>	<u>499</u>	<u>1</u>	
2	<u>.1</u>	<u>499</u>	<u>1</u>	
3	<u>.0</u>	<u>500</u>	<u>0</u>	

Average Difference: .7
*Perform recalibration if average difference is greater than 10

Calibration Precision = Average Difference / Cal Gas Conc. X 100%

$$= 100\% - \frac{.7}{500} \times 100\%$$

$$= 99.8\%$$

Span Sensitivity:

Trial 1: Counts Observed for the Span= <u>114596</u> Counters Observed for the Zero= <u>5082</u>	Trial 3: Counts Observed for the Span= <u>122620</u> Counters Observed for the Zero= <u>3195</u>
Trial 2: Counts Observed for the Span= <u>119980</u> Counters Observed for the Zero= <u>3017</u>	

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: entrance Reading: 1.2 ppm
Downwind Location Description: End 61 Reading: 1.6 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

Pre

SURFACE EMISSIONS MONITORING CALIBRATION AND PERTINENT DATA

Date: 11-29-21
Inspector(s): Michael M

Site Name: Newby
Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 1 MPH Wind Direction: SSE Barometric Pressure: 30.18 "Hg
Air Temperature: 48 °F General Weather Conditions: Sunny

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 5415 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>.2</u>	<u>501</u>	<u>1</u>	
2	<u>.2</u>	<u>499</u>	<u>1</u>	
3	<u>.0</u>	<u>499</u>	<u>1</u>	

Average Difference: 1
*Perform recalibration if average difference is greater than 10

Calibration Precision = Average Difference / Cal Gas Conc. X 100%

$$= 100\% - \frac{1}{500} \times 100\%$$

$$= 99.8\%$$

Span Sensitivity:

Trial 1:	Counts Observed for the Span = <u>94556</u>	Trial 3:	Counts Observed for the Span = <u>101388</u>
	Counters Observed for the Zero = <u>5137</u>		Counters Observed for the Zero = <u>5018</u>
Trial 2:	Counts Observed for the Span = <u>98960</u>		
	Counters Observed for the Zero = <u>5003</u>		

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Entrance Reading: 1.2 ppm
Downwind Location Description: Grid 61 Reading: 1.6 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

Pre

SURFACE EMISSIONS MONITORING CALIBRATION AND PERTINENT DATA

Date: 11-29-21 Site Name: Newby
 Inspector(s): Don G Robert M RM Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 1 MPH Wind Direction: SSE Barometric Pressure: 30.18 "Hg
 Air Temperature: 48 °F General Weather Conditions: sunny

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 5420 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>2</u>	<u>498</u>	<u>2</u>	
2	<u>0.2</u>	<u>499</u>	<u>1</u>	
3	<u>0.2</u>	<u>500</u>	<u>0</u>	

Average Difference: 1

*Perform recalibration if average difference is greater than 10

Calibration Precision= Average Difference/Cal Gas Conc. X 100%

$$= 100\% - \frac{1}{500} \times 100\%$$

$$= 99.8\%$$

Span Sensitivity:

Trial 1:	Trial 3:
Counts Observed for the Span= <u>1094100</u>	Counts Observed for the Span= <u>125160</u>
Counters Observed for the Zero= <u>3923</u>	Counters Observed for the Zero= <u>109400</u>
Counts Observed for the Span= <u>102496</u>	
Counters Observed for the Zero= <u>3851</u>	

Post Monitoring Calibration Check

Zero Air Reading: - 0.2 RM ppm Cal Gas Reading: 520 RM ppm
500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: entrance Reading: 1.2 ppm
 Downwind Location Description: Grnd 61 Reading: 1.4 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.



**SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA**

Date: 11-30-21 Site Name: Newby
 Inspector(s): Michael M Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 5 MPH Wind Direction: NW Barometric Pressure: 30 "Hg
 Air Temperature: 65 °F General Weather Conditions: Clear

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 5419 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>2</u>	<u>501</u>	<u>1</u>	<u>1</u>
2	<u>2</u>	<u>500</u>	<u>1</u>	<u>1</u>
3	<u>2</u>	<u>501</u>	<u>1</u>	<u>1</u>

Average Difference: .7
 *Perform recalibration if average difference is greater than 10

Calibration Precision = Average Difference / Cal Gas Conc. X 100%

$$= \frac{100\% \cdot .7}{500} \times 100\% = .14\%$$

Span Sensitivity:

Trial 1:	Trial 3:
Counts Observed for the Span = <u>106787</u>	Counts Observed for the Span = <u>108325</u>
Counters Observed for the Zero = <u>4634</u>	Counters Observed for the Zero = <u>4613</u>
Trial 2:	
Counts Observed for the Span = <u>65941</u>	
Counters Observed for the Zero = <u>4620</u>	

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm Cal Gas Reading: 900 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Entrance Reading: 1.1 ppm
 Downwind Location Description: Grid 61 Reading: 1.7 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

**SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA**

Date: 1/30/21 Site Name: Newby
 Inspector(s): Liam M Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 5 MPH Wind Direction: NW Barometric Pressure: 30 "Hg
 Air Temperature: 65 °F General Weather Conditions: Clear

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 1223 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>11</u>	<u>498</u>	<u>2</u>	<u>3</u>
2	<u>11</u>	<u>499</u>	<u>1</u>	<u>3</u>
3	<u>11</u>	<u>499</u>	<u>1</u>	<u>3</u>

Average Difference: 1.3
*Perform recalibration if average difference is greater than 10

Calibration Precision = Average Difference / Cal Gas Conc. X 100%
 = 100% - 1.3 / 500 x 100%
 = 0.26%

Span Sensitivity:

Trial 1: Counts Observed for the Span = <u>167434</u> Counters Observed for the Zero = <u>3566</u>	Trial 3: Counts Observed for the Span = <u>169735</u> Counters Observed for the Zero = <u>3529</u>
Trial 2: Counts Observed for the Span = <u>168886</u> Counters Observed for the Zero = <u>3547</u>	

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Entrance Reading: 1.1 ppm
 Downwind Location Description: Grid 61 Reading: 1.7 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

**SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA**

Date: 11-30-21 Site Name: Newby
 Inspector(s): Michael M Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 2 MPH Wind Direction: SE Barometric Pressure: NO "Hg
 Air Temperature: 47 °F General Weather Conditions: Clear

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 5415 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>16</u>	<u>502</u>	<u>2</u>	<u>3</u>
2	<u>15</u>	<u>501</u>	<u>2</u>	<u>4</u>
3	<u>17</u>	<u>500</u>	<u>1</u>	<u>4</u>

Average Difference: 1
 *Perform recalibration if average difference is greater than 10

Calibration Precision = Average Difference / Cal Gas Conc. X 100%
 = $100\% - \frac{1}{500} \times 100\%$
 = 99.8%

Span Sensitivity:

Trial 1: Counts Observed for the Span= <u>102347</u> Counters Observed for the Zero= <u>4963</u>	Trial 3: Counts Observed for the Span= <u>104977</u> Counters Observed for the Zero= <u>4941</u>
Trial 2: Counts Observed for the Span= <u>103647</u> Counters Observed for the Zero= <u>4952</u>	

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Entrance Reading: 1.2 ppm
 Downwind Location Description: Grid 6 Reading: 1.6 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

**SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA**

Date: 11-30-21 Site Name: Newby
 Inspector(s): Liam M Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 2 MPH Wind Direction: SE Barometric Pressure: 30 "Hg
 Air Temperature: 47 °F General Weather Conditions: Clear

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 1223 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc. - Cal Gas Reading	Response Time (seconds)
1	<u>1</u>	<u>499</u>	<u>4</u>	<u>1</u>
2	<u>2</u>	<u>501</u>	<u>4</u>	<u>1</u>
3	<u>2</u>	<u>502</u>	<u>2</u>	<u>1</u>

Average Difference: 1.3
 *Perform recalibration if average difference is greater than 10

Calibration Precision = Average Difference / Cal Gas Conc. X 100%
 = 100% - 1.3 / 500 x 100%
 = 94.7%

Span Sensitivity:

Trial 1: Counts Observed for the Span = <u>165711</u> Counters Observed for the Zero = <u>3847</u>	Trial 3: Counts Observed for the Span = <u>166473</u> Counters Observed for the Zero = <u>3820</u>
Trial 2: Counts Observed for the Span = <u>165742</u> Counters Observed for the Zero = <u>3837</u>	

Post Monitoring Calibration Check

Zero Air Reading: A ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Entrance Reading: 1.2 ppm
 Downwind Location Description: Driv 61 Reading: 1.6 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

**SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA**

Date: 12-3-21 Site Name: Newby
 Inspector(s): Michael M Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 3 MPH Wind Direction: SSE Barometric Pressure: 30 "Hg
 Air Temperature: 52 °F General Weather Conditions: overcast

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 5415 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>0</u>	<u>504</u>	<u>4</u>	<u>10</u>
2	<u>0</u>	<u>501</u>	<u>1</u>	<u>10</u>
3	<u>0</u>	<u>500</u>	<u>0</u>	<u>10</u>

Average Difference: 1.0
*Perform recalibration if average difference is greater than 10

Calibration Precision = Average Difference / Cal Gas Conc. X 100%
 = 100% - 19.4 / 500 x 100%
 = 19.4%

Span Sensitivity:

Trial 1:	Trial 3:
Counts Observed for the Span = <u>129142</u>	Counts Observed for the Span = <u>130911</u>
Counters Observed for the Zero = <u>5066</u>	Counters Observed for the Zero = <u>4821</u>
Trial 2:	
Counts Observed for the Span = <u>129024</u>	
Counters Observed for the Zero = <u>4832</u>	

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Flare Reading: 1.2 ppm
 Downwind Location Description: grid 61 Reading: 1.6 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

**SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA**

Date: 12-3-21 Site Name: Newry
 Inspector(s): Liam M Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 3 MPH Wind Direction: SSE Barometric Pressure: 30 "Hg
 Air Temperature: 52 °F General Weather Conditions: OVERCAST

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 1273 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>0</u>	<u>501</u>	<u>1</u>	<u>3</u>
2	<u>0</u>	<u>502</u>	<u>2</u>	<u>3</u>
3	<u>0</u>	<u>500</u>	<u>0</u>	<u>3</u>

Average Difference: 1
 *Perform recalibration if average difference is greater than 10

Calibration Precision= Average Difference/Cal Gas Conc. X 100%
 = 100% - 1 / 500 x 100%
 = 99.8 %

Span Sensitivity:

Trial 1:	Trial 3:
Counts Observed for the Span= <u>144040</u>	Counts Observed for the Span= <u>145911</u>
Counters Observed for the Zero= <u>2869</u>	Counters Observed for the Zero= <u>2790</u>
Trial 2:	
Counts Observed for the Span= <u>144324</u>	
Counters Observed for the Zero= <u>2764</u>	

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: FIVE Reading: 1.2 ppm
 Downwind Location Description: BEHIND ROAD Reading: 1.6 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

**SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA**

Date: 12-03-21 Site Name: Newry
 Inspector(s): Brian S Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 3 MPH Wind Direction: SSB Barometric Pressure: 30 "Hg
 Air Temperature: 52 °F General Weather Conditions: overcast

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 2364 Cal Gas Concentration: 500 ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>0</u>	<u>500</u>	<u>0</u>	<u>3</u>
2	<u>0</u>	<u>500</u>	<u>0</u>	<u>3</u>
3	<u>0</u>	<u>500</u>	<u>0</u>	<u>2</u>

Average Difference: 1.4
 *Perform recalibration if average difference is greater than 10

Calibration Precision = Average Difference / Cal Gas Conc. X 100%

$$= 100\% - \frac{1.4}{500} \times 100\%$$

$$= 0.28\%$$

Span Sensitivity:

Trial 1:	Trial 2:	Trial 3:
Counts Observed for the Span = <u>167280</u>	Counts Observed for the Span = <u>165966</u>	Counts Observed for the Span = <u>166831</u>
Counters Observed for the Zero = <u>4265</u>	Counters Observed for the Zero = <u>4777</u>	Counters Observed for the Zero = <u>4362</u>

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Flare Reading: 1.2 ppm
 Downwind Location Description: ovid 61 Reading: 1.6 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

**SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA**

Date: 12-3-21 Site Name: NEWBY
 Inspector(s): Robert Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 3 MPH Wind Direction: SSE Barometric Pressure: 30 "Hg
 Air Temperature: 52 °F General Weather Conditions: overcast

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 2367 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>0</u>	<u>498</u>	<u>2</u>	<u>10 min</u>
2	<u>0</u>	<u>500</u>	<u>0</u>	
3	<u>0</u>	<u>501</u>	<u>1</u>	

Average Difference: 1
 *Perform recalibration if average difference is greater than 10

Calibration Precision= Average Difference/Cal Gas Conc. X 100%
 = 100% - 1 / 500 x 100%
 = 0.2%

Span Sensitivity:

Trial 1:	Counts Observed for the Span= <u>121600</u>	Trial 3:	Counts Observed for the Span= <u>124813</u>
	Counters Observed for the Zero= <u>4726</u>		Counters Observed for the Zero= <u>4797</u>
Trial 2:	Counts Observed for the Span= <u>126312</u>		
	Counters Observed for the Zero= <u>4713</u>		

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: FAIR Reading: 1.1 ppm
 Downwind Location Description: grid 65 Reading: 1.7 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

**SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA**

Date: 12-3-21 Site Name: Newby
 Inspector(s): Michael M Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 003 MPH Direction: NE Barometric Pressure: 30 "Hg
 Air Temperature: 57 °F General Weather Conditions: overcast

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 9415 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc - Cal Gas Reading	Response Time (seconds)
1	<u>1</u>	<u>499</u>	<u>1</u>	<u>3</u>
2	<u>2</u>	<u>500</u>	<u>0</u>	<u>4</u>
3	<u>3</u>	<u>501</u>	<u>1</u>	<u>4</u>

Average Difference: 1.7
 *Perform recalibration if average difference is greater than 10

Calibration Precision = Average Difference / Cal Gas Conc. X 100%

$$= 100\% - \frac{1.7}{500} \times 100\%$$

$$= 99.6\%$$

Span Sensitivity:

Trial 1:	Trial 2:	Trial 3:
Counts Observed for the Span = <u>131929</u>	Counts Observed for the Span = <u>13247</u>	Counts Observed for the Span = <u>133798</u>
Counters Observed for the Zero = <u>4632</u>	Counters Observed for the Zero = <u>4621</u>	Counters Observed for the Zero = <u>4613</u>

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: FBHP Reading: 1.1 ppm
 Downwind Location Description: Grid 61 Reading: 1.7 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

**SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA**

Date: 12-3-21 Site Name: Newry
 Inspector(s): Liam M Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 3 MPH Wind Direction: NE Barometric Pressure: 30 "Hg
 Air Temperature: 57 °F General Weather Conditions: overcast

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 1223 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>1.3</u>	<u>502</u>	<u>2</u>	<u>1.5</u>
2	<u>1.3</u>	<u>501</u>	<u>1</u>	<u>1.5</u>
3	<u>1.3</u>	<u>500</u>	<u>1</u>	<u>1.5</u>

Average Difference: 1
 *Perform recalibration if average difference is greater than 10

Calibration Precision= Average Difference/Cal Gas Conc. X 100%
 = 100% - 1 / 500 x 100%
 = 99.8 %

Span Sensitivity:

Trial 1:	Counts Observed for the Span= <u>145613</u>	Trial 3:	Counts Observed for the Span= <u>147326</u>
	Counters Observed for the Zero= <u>2537</u>		Counters Observed for the Zero= <u>2511</u>
Trial 2:	Counts Observed for the Span= <u>146798</u>		
	Counters Observed for the Zero= <u>2529</u>		

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Flare Reading: 1.1 ppm
 Downwind Location Description: grid 61 Reading: 1.7 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

**SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA**

Date: 12-03-21 Site Name: NEWBY
 Inspector(s): BRAINS Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 13 MPH Wind Direction: NE Barometric Pressure: 30 "Hg
 Air Temperature: 57 °F General Weather Conditions: overcast

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 2364 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>0</u>	<u>501</u>	<u>1</u>	<u>1.3</u>
2	<u>0</u>	<u>502</u>	<u>2</u>	<u>1.3</u>
3	<u>0</u>	<u>501</u>	<u>1</u>	<u>1.3</u>

Average Difference: 1.3
 *Perform recalibration if average difference is greater than 10

Calibration Precision = Average Difference / Cal Gas Conc. X 100%
 = 100% - 1.3 / 500 x 100%
 = 0.26%

Span Sensitivity:

Trial 1:	Trial 3:
Counts Observed for the Span = <u>168278</u>	Counts Observed for the Span = <u>170383</u>
Counters Observed for the Zero = <u>3879</u>	Counters Observed for the Zero = <u>3851</u>
Trial 2:	
Counts Observed for the Span = <u>169832</u>	
Counters Observed for the Zero = <u>3861</u>	

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Flare Reading: 1.1 ppm
 Downwind Location Description: grid 61 Reading: 1.7 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

**SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA**

Date: 12-3-21 Site Name: Newby
 Inspector(s): Robert Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 3 MPH Wind Direction: NE Barometric Pressure: 30 "Hg
 Air Temperature: 57 °F General Weather Conditions: overcast

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 2367 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>2</u>	<u>500</u>	<u>9</u>	<u>3</u>
2	<u>2</u>	<u>500</u>	<u>9</u>	<u>3</u>
3	<u>2</u>	<u>500</u>	<u>9</u>	<u>3</u>

Average Difference: 1
*Perform recalibration if average difference is greater than 10

Calibration Precision= Average Difference/Cal Gas Conc. X 100%

$$= \frac{100\% - 1}{500} \times 100\% = 0.2\%$$

Span Sensitivity:

Trial 1:	Trial 2:	Trial 3:
Counts Observed for the Span= <u>125945</u>	Counts Observed for the Span= <u>126897</u>	Counts Observed for the Span= <u>127544</u>
Counters Observed for the Zero= <u>4361</u>	Counters Observed for the Zero= <u>4350</u>	Counters Observed for the Zero= <u>4342</u>

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Flare Reading: 1.1 ppm
 Downwind Location Description: grid 61 Reading: 1.7 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

**SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA**

Date: 12-8-21 Site Name: Newbx
 Inspector(s): Liam McGinn Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 3.0 MPH Wind Direction: WNW Barometric Pressure: 30 "Hg
 Air Temperature: 70 °F General Weather Conditions: cloudy

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 5420 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>-0</u>	<u>501</u>	<u>1</u>	
2	<u>0</u>	<u>500</u>	<u>0</u>	
3	<u>-1</u>	<u>500</u>	<u>0</u>	

Average Difference: .3

*Perform recalibration if average difference is greater than 10

Calibration Precision= Average Difference/Cal Gas Conc. X 100%

= 100% - .3 / 500 x 100%

= 99.9 %

Span Sensitivity:

Trial 1:	Counts Observed for the Span= <u>144296</u>	Trial 3:	Counts Observed for the Span= <u>150772</u>
	Counters Observed for the Zero= <u>3761</u>		Counters Observed for the Zero= <u>3625</u>
Trial 2:	Counts Observed for the Span= <u>145996</u>		
	Counters Observed for the Zero= <u>3663</u>		

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: entrance Reading: 112 ppm
 Downwind Location Description: Grid 61 Reading: 117 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

**SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA**

post

Date: 12-8-21

Site Name: ~~Grant~~ Neaby

Inspector(s): Liam McGrath

Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 3.1 MPH

Wind Direction: ww

Barometric Pressure: 30 "Hg

Air Temperature: 51 °F

General Weather Conditions: cloudy

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 5420

Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	0	502	2	7
2	0	501	1	7
3	1	500	0	4

Average Difference: 1

*Perform recalibration if average difference is greater than 10

Calibration Precision= Average Difference/Cal Gas Conc. X 100%

= 100% - 1 / 500 x 100%

= 99.8 %

Span Sensitivity:

Trial 1:	Counts Observed for the Span= <u>151378</u>
	Counters Observed for the Zero= <u>3485</u>
Trial 2:	Counts Observed for the Span= <u>151372</u>
	Counters Observed for the Zero= <u>3512</u>

Trial 3:	Counts Observed for the Span= <u>151405</u>
	Counters Observed for the Zero= <u>3496</u>

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm

Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: entrance

Reading: 1.2 ppm

Downwind Location Description: Orndel

Reading: 1.4 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

**SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA**

Date: 12-04-21 Site Name: NEWBY
 Inspector(s): Michael M Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 8 MPH Wind Direction: W Barometric Pressure: MC "Hg
 Air Temperature: 51 °F General Weather Conditions: CLOUDY

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 5420 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>0</u>	<u>503</u>	<u>3</u>	<u>1.5</u>
2	<u>0</u>	<u>501</u>	<u>1</u>	<u>1.5</u>
3	<u>0</u>	<u>500</u>	<u>0</u>	<u>1.5</u>

Average Difference: 1.3
*Perform recalibration if average difference is greater than 10

Calibration Precision= Average Difference/Cal Gas Conc. X 100%

$$= 100\% \cdot \frac{1.3}{500} \times 100\%$$

$$= 0.26\%$$

Span Sensitivity:

Trial 1:	Trial 3:
Counts Observed for the Span= <u>154084</u>	Counts Observed for the Span= <u>156069</u>
Counters Observed for the Zero= <u>3774</u>	Counters Observed for the Zero= <u>3748</u>
Trial 2:	
Counts Observed for the Span= <u>155724</u>	
Counters Observed for the Zero= <u>3761</u>	

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: FLOR ENTRANCE Reading: 1.3 ppm
 Downwind Location Description: FLOR ENTRANCE Reading: 1.8 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

**SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA**

Date: 12-01-21 Site Name: Newby
 Inspector(s): WMM Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 8 MPH Wind Direction: W Barometric Pressure: 30 "Hg
 Air Temperature: 51 °F General Weather Conditions: CLOUDY

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 1211 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	<u>10</u>	<u>502</u>	<u>2</u>	<u>3</u>
2	<u>11</u>	<u>501</u>	<u>2</u>	<u>4</u>
3	<u>11</u>	<u>500</u>	<u>2</u>	<u>4</u>

Average Difference: 1
*Perform recalibration if average difference is greater than 10

Calibration Precision= Average Difference/Cal Gas Conc. X 100%

$$= 100\% - \frac{1}{500} \times 100\%$$

$$= 0.8\%$$

Span Sensitivity:

Trial 1:	Trial 3:
Counts Observed for the Span= <u>141876</u>	Counts Observed for the Span= <u>151877</u>
Counters Observed for the Zero= <u>141876 4155</u>	Counters Observed for the Zero= <u>4133</u>
Trial 2:	
Counts Observed for the Span= <u>150811</u>	
Counters Observed for the Zero= <u>4163</u>	

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Flare Reading: 1.3 ppm
 Downwind Location Description: ENTRANCE Reading: 1.8 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

**SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA**

Date: 12-01-21 Site Name: Newby
 Inspector(s): Michael M Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 8 MPH Wind Direction: NW Barometric Pressure: 30 "Hg
 Air Temperature: 56 °F General Weather Conditions: Clear

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 5470 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc. - Cal Gas Reading	Response Time (seconds)
1	<u>10</u>	<u>500</u>	<u>490</u>	<u>15</u>
2	<u>10</u>	<u>509</u>	<u>499</u>	<u>15</u>
3	<u>10</u>	<u>501</u>	<u>491</u>	<u>15</u>

Average Difference: 7
*Perform recalibration if average difference is greater than 10

Calibration Precision = Average Difference / Cal Gas Conc. x 100%
 = 100% - 7 / 500 x 100%
 = 1.4%

Span Sensitivity:

Trial 1:	Trial 2:	Trial 3:
Counts Observed for the Span = <u>158072</u>	Counts Observed for the Span = <u>154722</u>	Counts Observed for the Span = <u>160802</u>
Counters Observed for the Zero = <u>3486</u>	Counters Observed for the Zero = <u>3472</u>	Counters Observed for the Zero = <u>3458</u>

Post Monitoring Calibration Check

Zero Air Reading: 0 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: FAVE Reading: 1.2 ppm
 Downwind Location Description: ENTRANCE Reading: 1.9 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

**SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA**

Date: 12-04-21 Site Name: Newby
 Inspector(s): Liam M Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 8 MPH Wind Direction: NW Barometric Pressure: 30 "Hg
 Air Temperature: 56 °F General Weather Conditions: Clear

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: 1711 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc. - Cal Gas Reading	Response Time (seconds)
1	<u>19</u>	<u>508</u>	<u>8</u>	<u>34</u>
2	<u>17</u>	<u>509</u>	<u>9</u>	<u>34</u>
3	<u>17</u>	<u>509</u>	<u>9</u>	<u>34</u>

Average Difference: 1.3
*Perform recalibration if average difference is greater than 10

Calibration Precision = Average Difference / Cal Gas Conc. X 100%

$$= 100\% - \frac{1.3}{500} \times 100\% = 19.4\%$$

Span Sensitivity:

Trial 1:	Trial 3:
Counts Observed for the Span = <u>153873</u>	Counts Observed for the Span = <u>156084</u>
Counters Observed for the Zero = <u>3849</u>	Counters Observed for the Zero = <u>3812</u>
Trial 2:	
Counts Observed for the Span = <u>154723</u>	
Counters Observed for the Zero = <u>3833</u>	

Post Monitoring Calibration Check

Zero Air Reading: 9 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

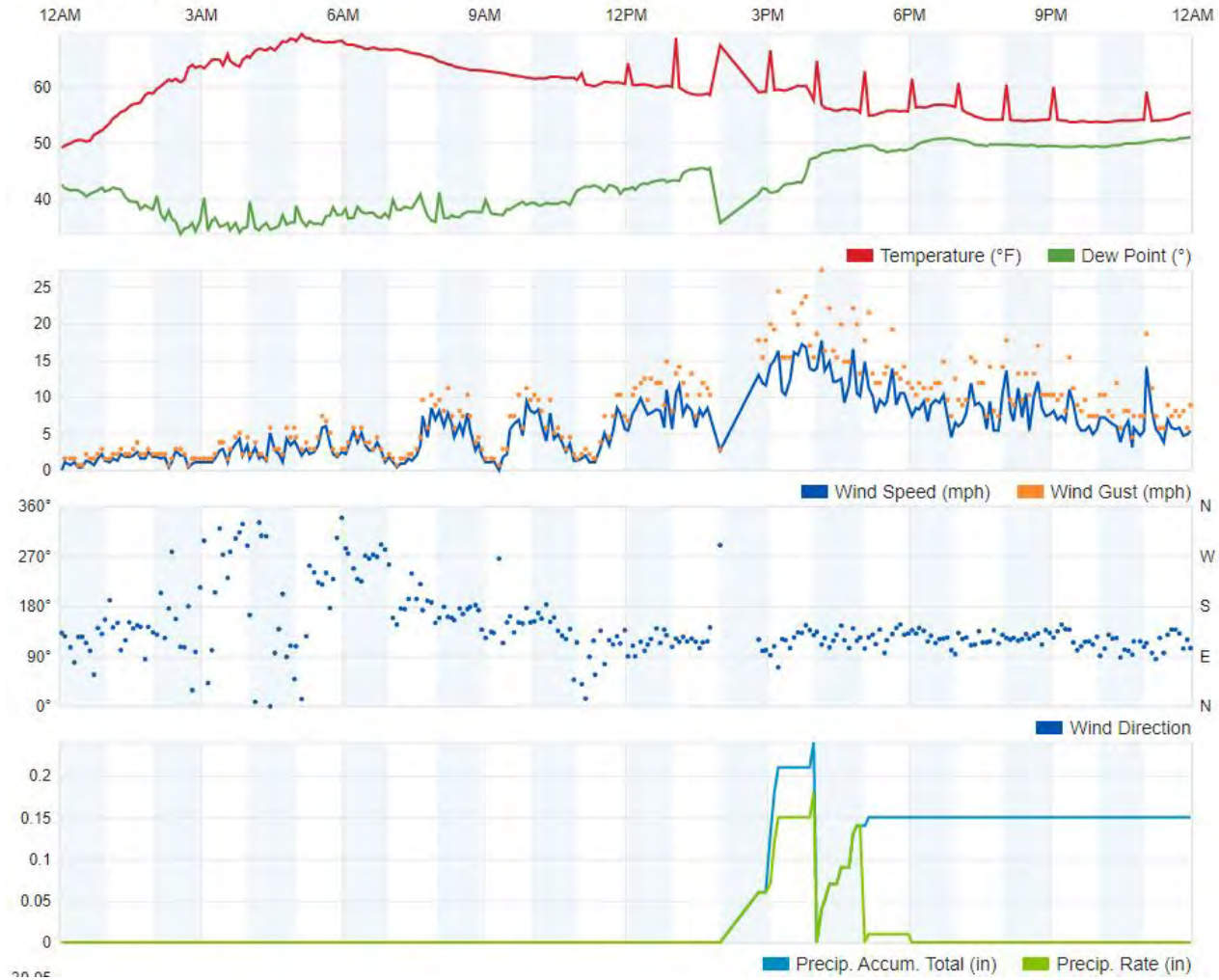
Upwind Location Description: FIELD Reading: 1.2 ppm
 Downwind Location Description: ENTRANCE Reading: 1.9 ppm

Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested alternatives of the LMR requirements on the above mentioned date.

Attachment 6

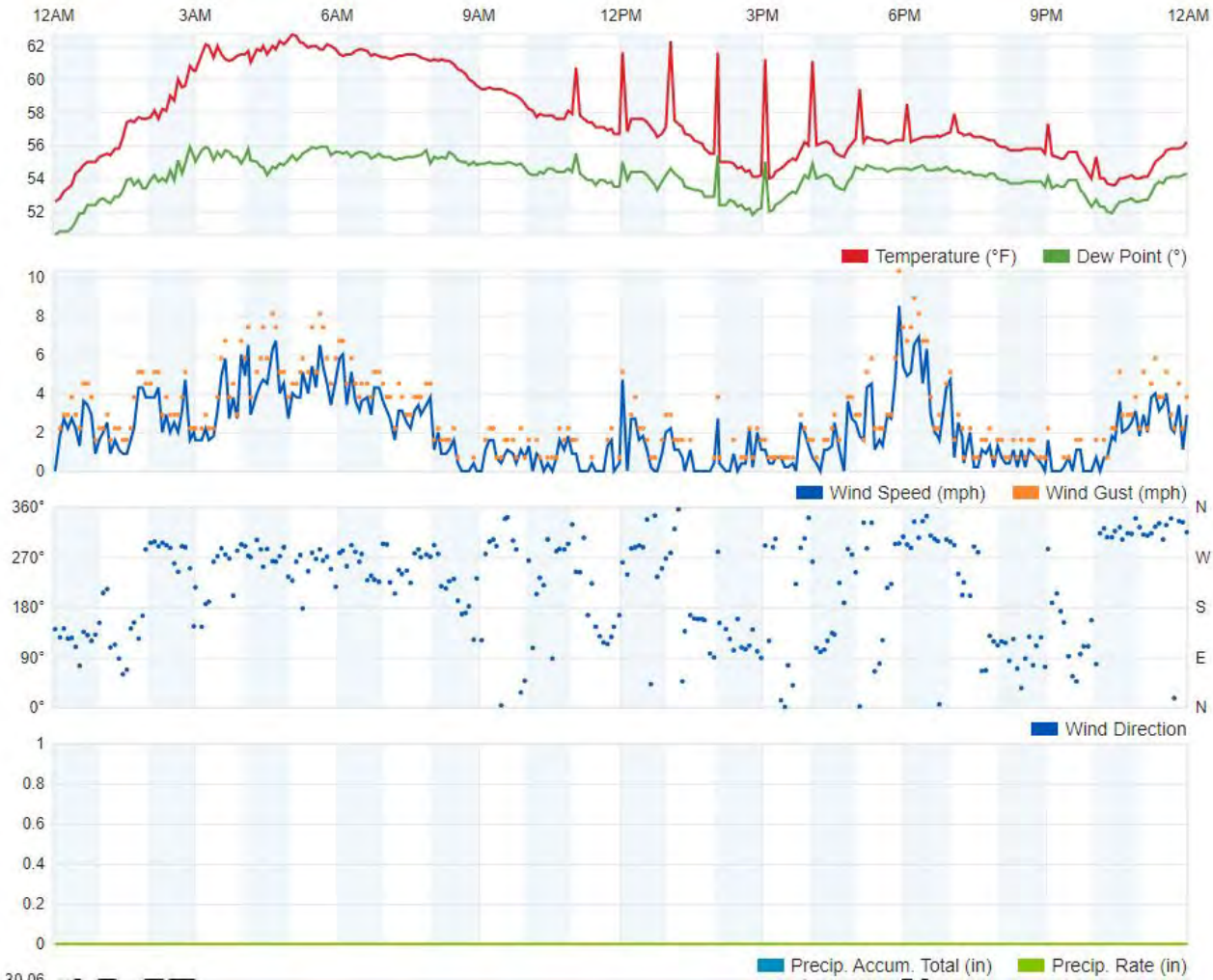
Weather Data

November 8, 2021



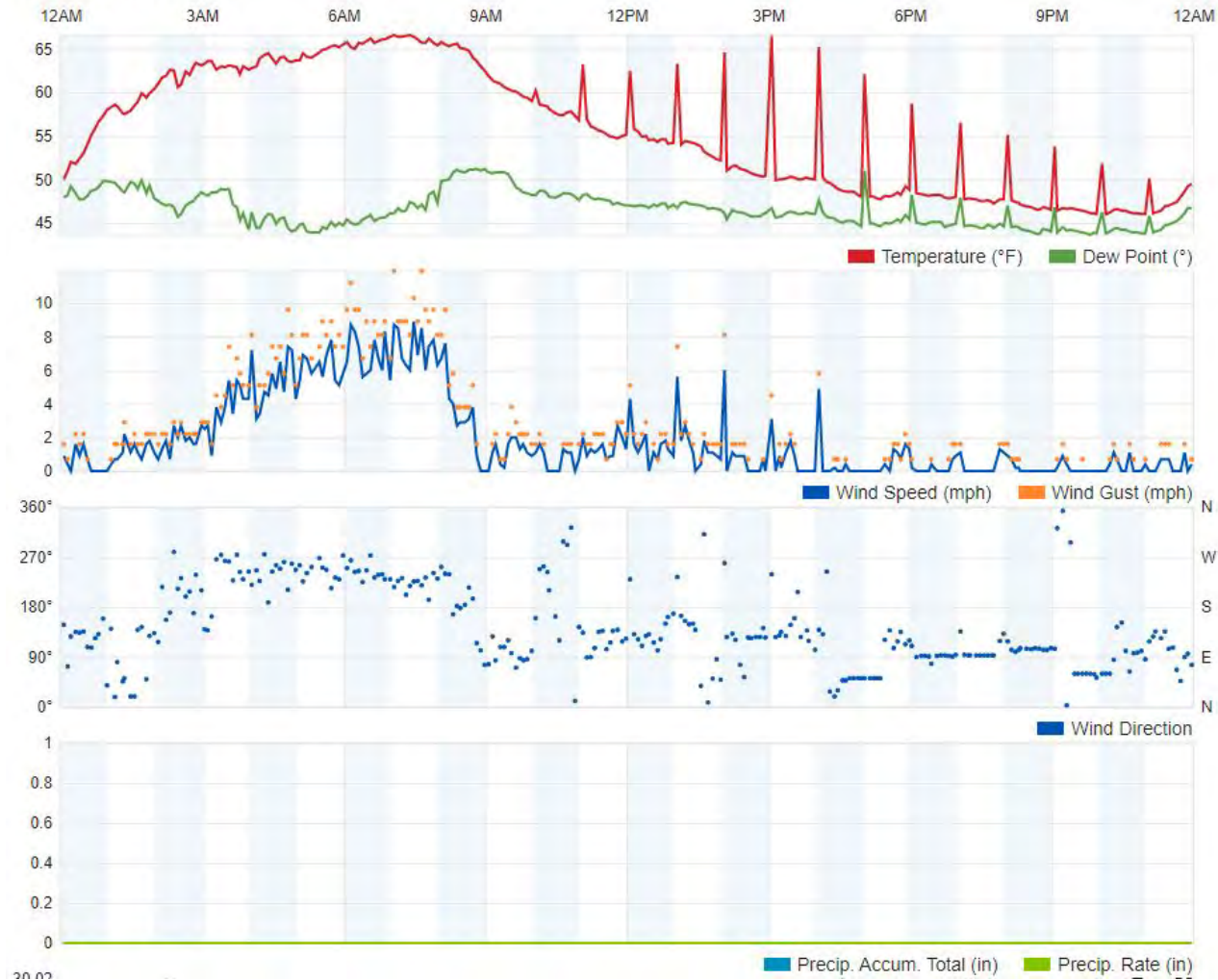
Fourth Quarter 2021
LMR Surface Emissions Monitoring Weather Data
November 8, 2021
Newby Island Landfill, Milpitas, California

November 15, 2021



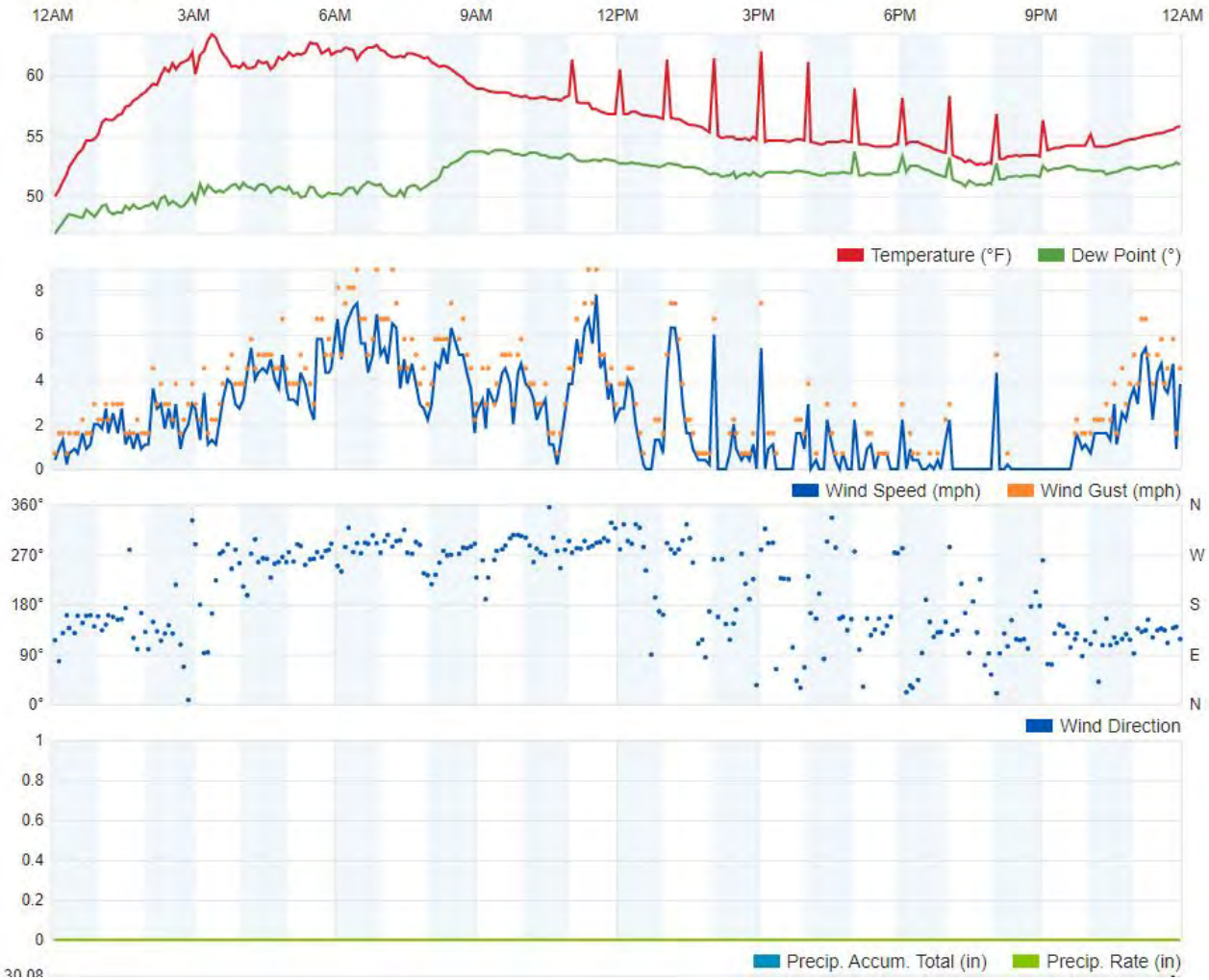
Fourth Quarter 2021
LMR Surface Emissions Monitoring Weather Data
November 15, 2021
Newby Island Landfill, Milpitas, California

November 17, 2021



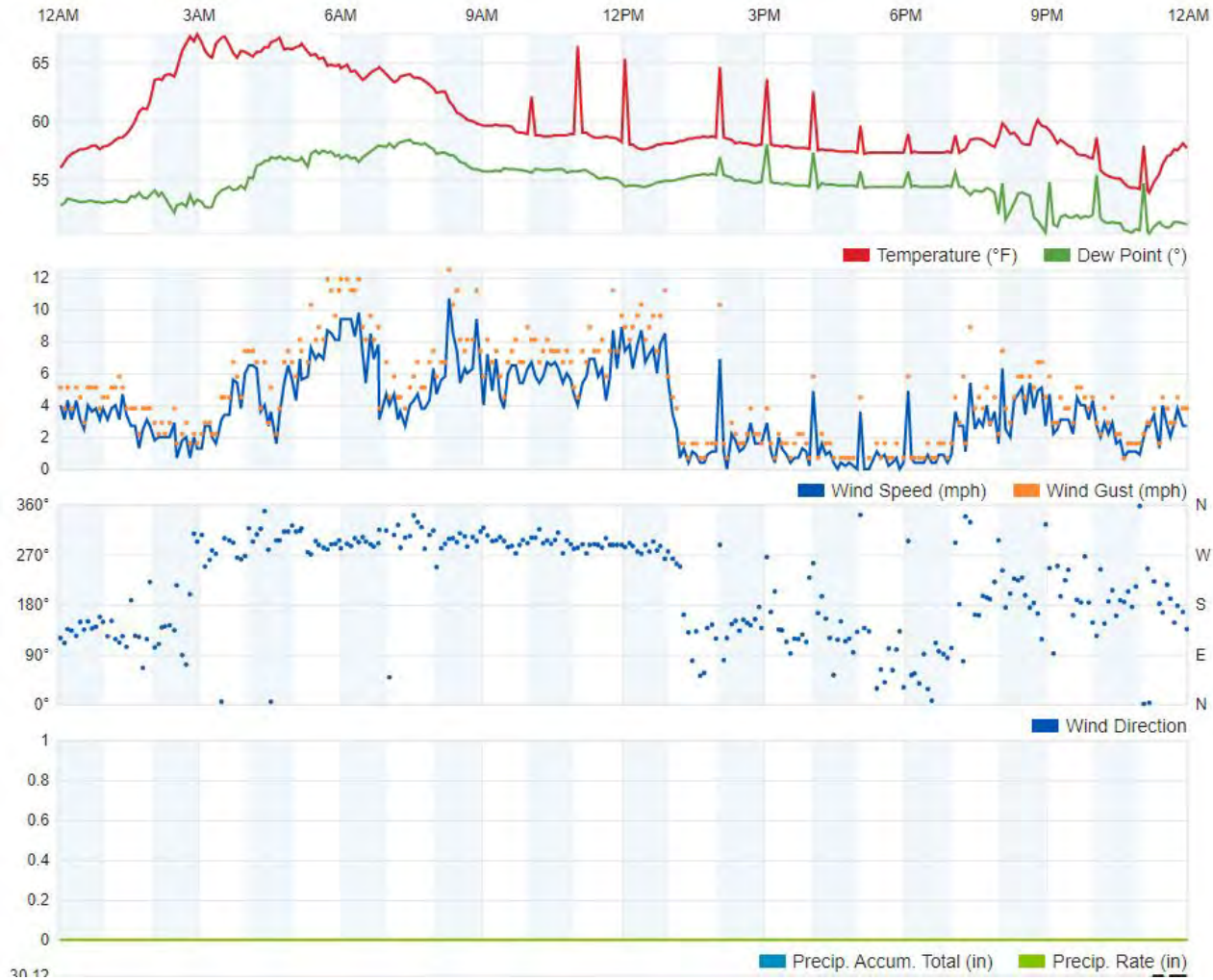
Fourth Quarter 2021
LMR Surface Emissions Monitoring Weather Data
November 17, 2021
Newby Island Landfill, Milpitas, California

November 18, 2021



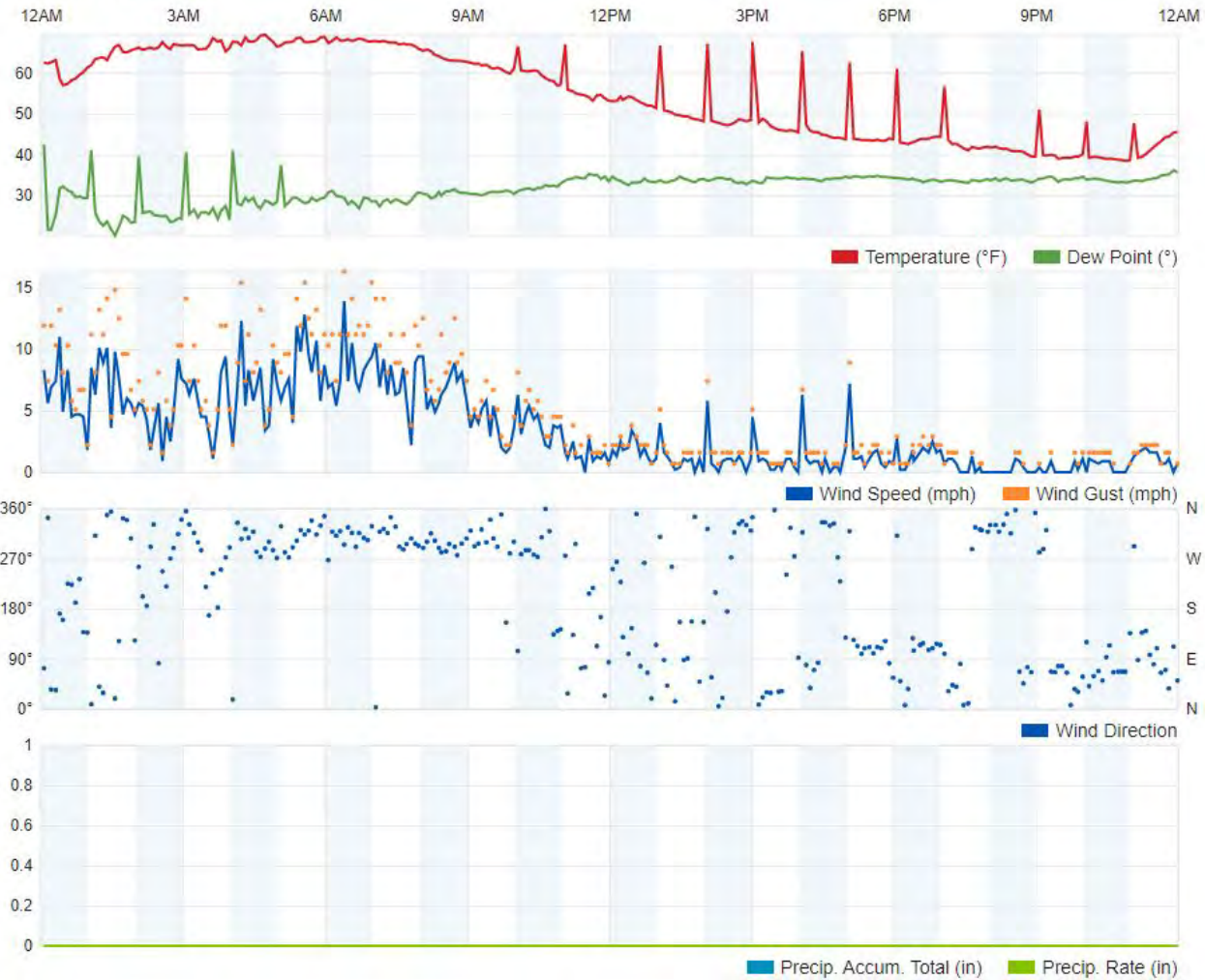
Fourth Quarter 2021
LMR Surface Emissions Monitoring Weather Data
November 18, 2021
Newby Island Landfill, Milpitas, California

November 19, 2021



Fourth Quarter 2021
LMR Surface Emissions Monitoring Weather Data
November 19, 2021
Newby Island Landfill, Milpitas, California

November 24, 2021



Fourth Quarter 2021
LMR Surface Emissions Monitoring Weather Data
November 24, 2021
Newby Island Landfill, Milpitas, California

November 29, 2021



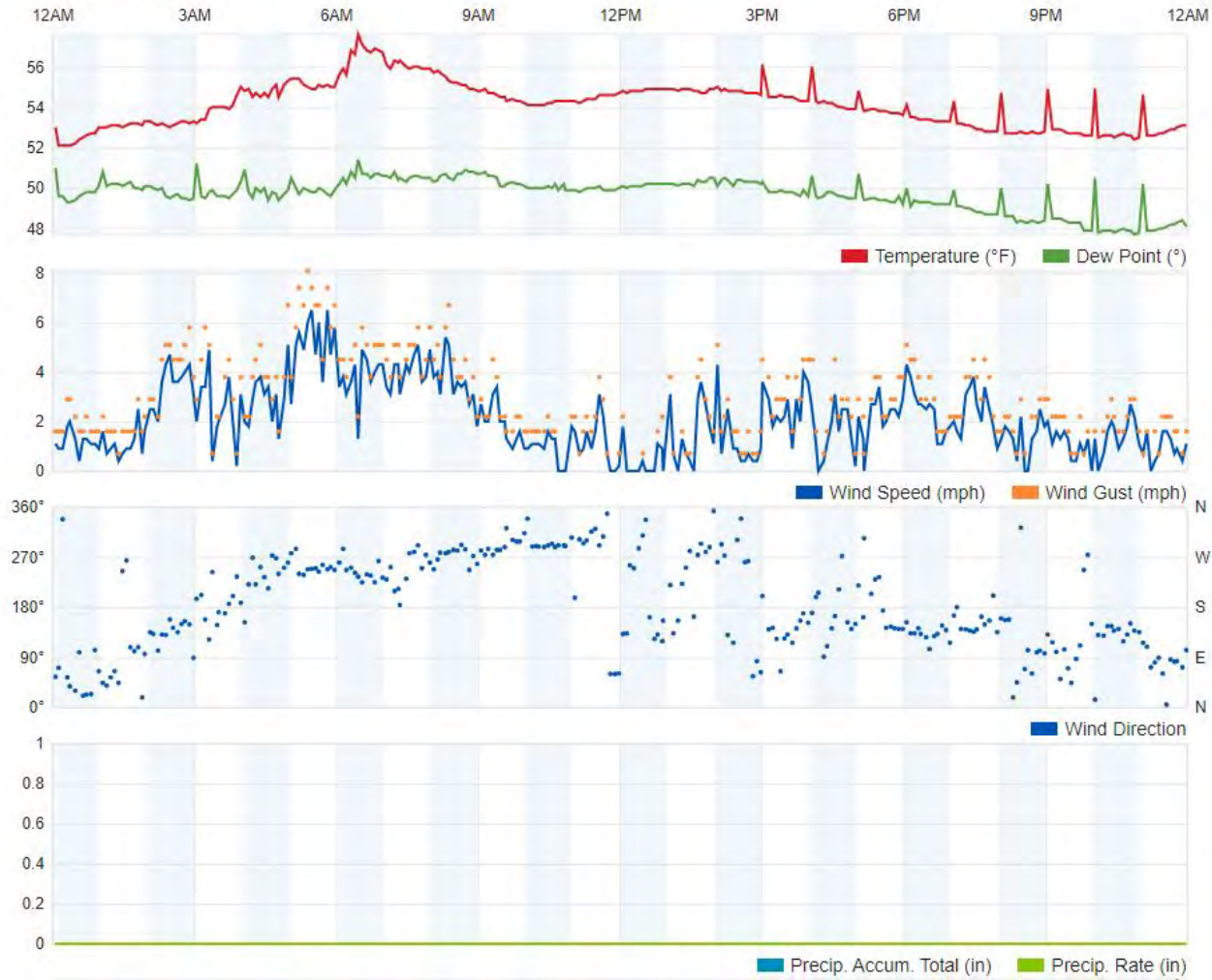
Fourth Quarter 2021
LMR Surface Emissions Monitoring Weather Data
November 29, 2021
Newby Island Landfill, Milpitas, California

November 30, 2021



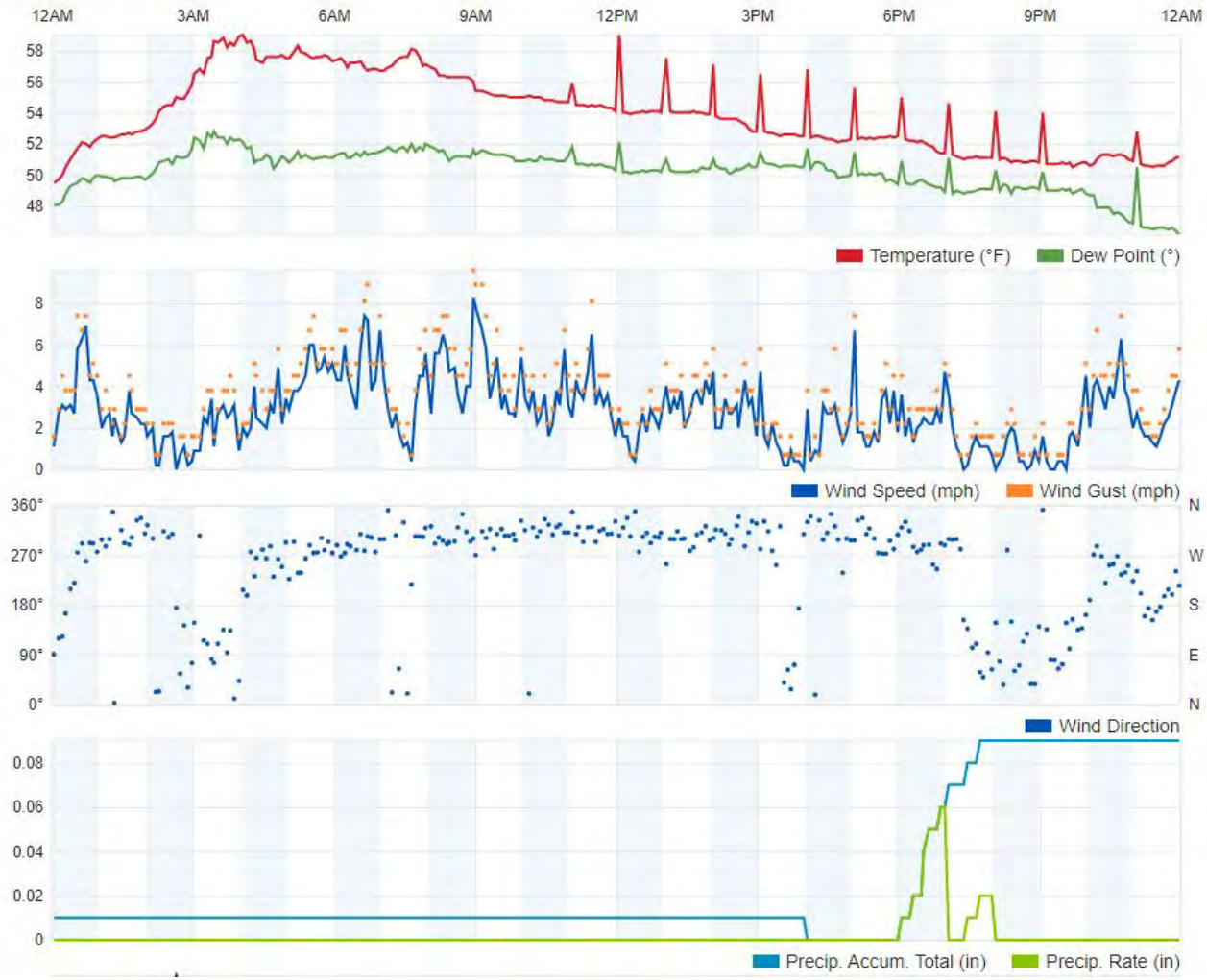
Fourth Quarter 2021
LMR Surface Emissions Monitoring Weather Data
November 30, 2021
Newby Island Landfill, Milpitas, California

December 3, 2021



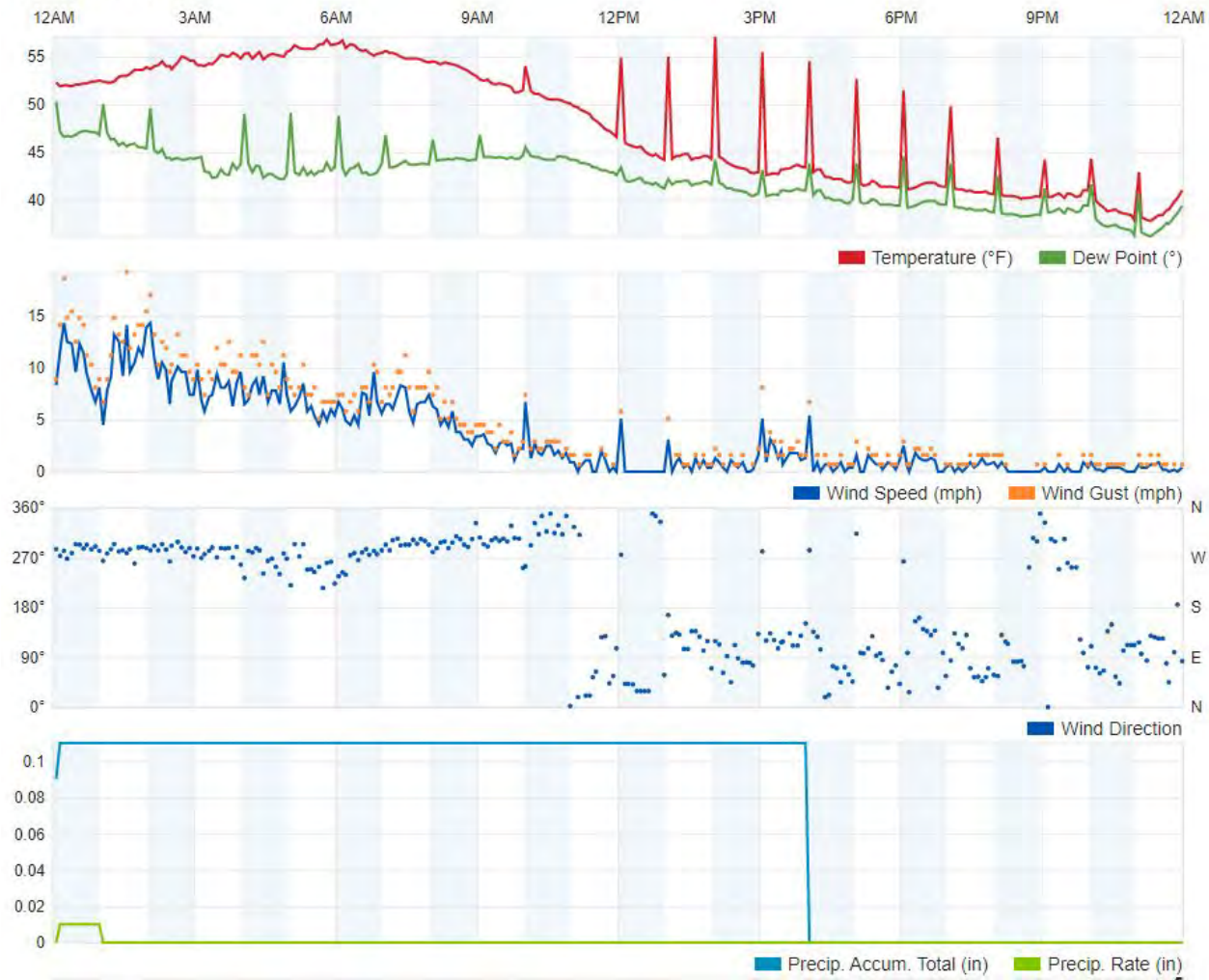
Fourth Quarter 2021
LMR Surface Emissions Monitoring Weather Data
December 3, 2021
Newby Island Landfill, Milpitas, California

December 8, 2021



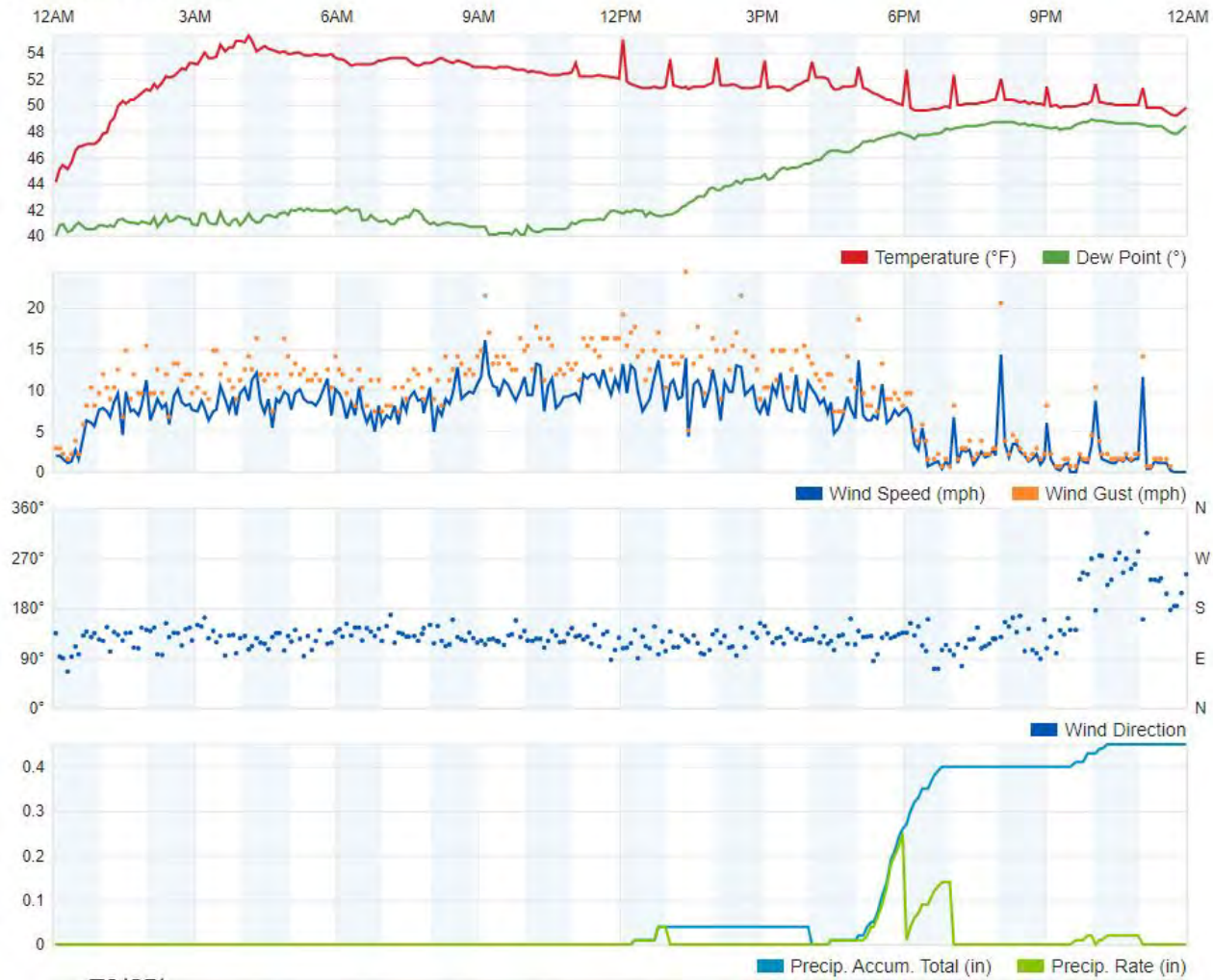
Fourth Quarter 2021
LMR Surface Emissions Monitoring Weather Data
December 8, 2021
Newby Island Landfill, Milpitas, California

December 9, 2021



Fourth Quarter 2021
LMR Surface Emissions Monitoring Weather Data
December 9, 2021
Newby Island Landfill, Milpitas, California

December 15, 2021



Fourth Quarter 2021
LMR Surface Emissions Monitoring Weather Data
December 15, 2021
Newby Island Landfill, Milpitas, California

Appendix D – Root Cause Analysis Forms



PRESSURE EXCEEDANCE

Root Cause Analysis

Date of Initial Exceedance:	8/10/2021
Collection Device ID:	NILEW666
Pressure Reading:	0.66

Root Cause Analysis	
Was the reason for the positive pressure due to one of the following:	
A fire or increased well temperature.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Use of a geomembrane or synthetic cover.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
A decommissioned well.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<ul style="list-style-type: none"> If YES to ANY of the above, exempt as per 40 CFR 62.16720(a)(3)(iii)/ 40 CFR §63.1958(b). If NO to ALL of the above, continue the form. 	
Describe what was inspected.	
Vacuum source at wellhead (lateral is buried/inaccessible)	
Describe what was determined to be the root cause of the exceedance.	
Lack of vacuum on lateral riser, may be damaged or flooded	
Determine the required next steps.	
Was the positive pressure remediated within 60 days since the initial exceedance?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<ul style="list-style-type: none"> If YES, keep records of Root Cause Analysis. No reporting required. If NO, continue with Corrective Action Analysis and Implementation Plan and submit Notification to state agency within 75 days of initial exceedance. 	



TEMPERATURE EXCEEDANCE

Root Cause Analysis

Date of Initial Exceedance:	8/10/2021
Collection Device ID:	NILEW703
Temperature Reading:	131.2

Root Cause Analysis	
Has the owner/operator received approval from the state agency to operate at a temperature higher than 55°C (131°F) for this well?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<ul style="list-style-type: none"> If YES, exempt as per 40 CFR 62.16720(a)(4)(iii)/ 40 CFR 63.1958(c). If NO, continue the form. 	
Describe what was inspected.	
Gas Sample and de-watering system.	
Describe what was determined to be the root cause of the exceedance.	
Elevated microbial activity	
Determine the required next steps.	
Was the temperature exceedance remediated within 60 days since the initial exceedance?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<ul style="list-style-type: none"> If YES, keep records of Root Cause Analysis. No reporting required. If NO, continue with Corrective Action Analysis and Implementation Plan and submit Notification to state agency within 75 days of initial exceedance. 	



PRESSURE EXCEEDANCE

Root Cause Analysis

Date of Initial Exceedance:	8/10/2021
Collection Device ID:	NILEW711
Pressure Reading:	0.71

Root Cause Analysis	
Was the reason for the positive pressure due to one of the following:	
A fire or increased well temperature.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Use of a geomembrane or synthetic cover.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
A decommissioned well.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<ul style="list-style-type: none"> If YES to ANY of the above, exempt as per 40 CFR 62.16720(a)(3)(iii)/ 40 CFR §63.1958(b). If NO to ALL of the above, continue the form. 	
Describe what was inspected.	
Vacuum source at wellhead (lateral is buried/inaccessible)	
Describe what was determined to be the root cause of the exceedance.	
Lack of vacuum on lateral riser, may be damaged or flooded	
Determine the required next steps.	
Was the positive pressure remediated within 60 days since the initial exceedance?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<ul style="list-style-type: none"> If YES, keep records of Root Cause Analysis. No reporting required. If NO, continue with Corrective Action Analysis and Implementation Plan and submit Notification to state agency within 75 days of initial exceedance. 	



PRESSURE EXCEEDANCE

Corrective Action Analysis and Implementation Schedule

Date of Initial Exceedance:	8/10/2021
Collection Device ID:	NILEW711
Pressure Reading:	0.71

Corrective Action Analysis	
Describe the corrective actions taken to remediate exceedance.	
Wellhead remoted, new lateral installed to restore system vacuum source	

Implementation Schedule	
Expected Start Date:	10/12/2021
Expected Completion Date:	12/3/2021
Provide a description of proposed repairs and/or remedial action required and supporting information for implementation timeframe.	
Wellhead remote run and lateral repair planned during ongoing construction by Guinn Construction	

Final Steps	
Determine the required next steps.	
Is the remediation expected to take less than 120 days since initial exceedance per implementation schedule?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<ul style="list-style-type: none"> • If YES, send notification to state agency within 75 days of initial exceedance. Include Root Cause Analysis, Corrective Action Analysis, and Implementation Schedule in the next NSPS Report. • If NO, send Root Cause Analysis, Corrective Action Analysis, and Implementation Schedule to state agency within 75 days for approval and include in next NSPS Report. 	



Newby Island Landfill 1601 Dixon Landing Road, Milpitas, CA 95035
o 408.586.2263 c 510.298.7892 republicservices.com

October 22, 2021

Tamiko Endow
Senior Air Quality Engineer
Bay Area Air Quality Management District
375 Beale Street, Suite 600
San Francisco, CA 94105

Re: 75-Day Notification of Pressure Exceedances
International Disposal Corp. of California, Milpitas, California
Facility Number A9013

Ms. Endow:

International Disposal Corp. of CA (IDCC), owner and operator of the Newby Island Landfill (Newby), located in Milpitas, California, hereby provides the Bay Area Air Quality Management District (BAAQMD) with a 75-day notification pursuant to the compliance provisions identified in Title 40 of the Code of Federal Regulations (CFR) 60.767(j)(2) for pressure exceedances at landfill gas (LFG) extraction wells NILEW711, NILEW744, and NILEW745 out of an abundance of caution. The three wells are located within the vicinity of construction activities, in which IDCC submitted a Request for Limited Exemption (for Construction Activities) from Regulation 8, Rule 34, Section 118 on May 25, 2021 for construction activities scheduled to take place from June 1, 2021 through December 10, 2021. The Request for Limited Exemption can be found in Attachment A.

The initial pressure exceedances occurred on August 10, 2021 for all three wells. Well NILEW711, NILEW744, and NILEW745 had an initial pressure exceedances of 0.71, 1.34, and 0.01 inches of water ("H₂O"), respectively. For all the wells, corrective actions were initiated within 5 days as the valves were adjusted; however, the wells could not be brought back into compliance within 15 days.

As required under 40 CFR 60.765(a)(5), a root cause analysis was completed within 15 days and a corrective action analysis and implementation schedule was completed within 60 days from the original exceedance for all the wells. Copies of these forms can be found in Attachment B. All the steps for compliance were conducted, however, these wells remain in exceedance but will be remediated prior to the 120-day deadlines. As such, this 75-day notification is required.

If you have any questions or require additional information, please do not hesitate to contact Rachelle Huber at (408) 586-2263 or by email at rhuber2@republicservices.com or Michael Flanagan of SCS Field Services (SCSFS) at 510-363-7796 or by email at MFlanagan@scsengineers.com.

Sincerely,

A handwritten signature in black ink that reads "Rachelle Huber".

Rachelle Huber
Environmental Manager
Newby Island Landfill

cc: Josh Mills, Newby Island

Tamiko Endow
Senior Air Quality Engineer
BAAQMD
October 22, 2021
Page 2

Michael Flanagan, SCS Field Services
Cassandra Drotman, SCS Engineers
Anne Liu, SCS Engineers
Jay Patel, BAAQMD
Administrator, U.S. EPA Region 9

- Attachment A: Request for Limited Exemption (for Construction Activities) from Regulation 8, Rule 34, Section 118
- Attachment B: 15-day Root Cause Analysis Forms and 60-Day Corrective Action Analysis and Implementation Schedule Forms



PRESSURE EXCEEDANCE

Root Cause Analysis

Date of Initial Exceedance:	8/10/2021
Collection Device ID:	NILEW744
Pressure Reading:	1.34

Root Cause Analysis	
Was the reason for the positive pressure due to one of the following:	
A fire or increased well temperature.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Use of a geomembrane or synthetic cover.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
A decommissioned well.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<ul style="list-style-type: none"> If YES to ANY of the above, exempt as per 40 CFR 62.16720(a)(3)(iii)/ 40 CFR §63.1958(b). If NO to ALL of the above, continue the form. 	
Describe what was inspected.	
Vacuum source at wellhead (lateral is buried/inaccessible)	
Describe what was determined to be the root cause of the exceedance.	
Lack of vacuum on lateral riser, may be damaged or flooded	
Determine the required next steps.	
Was the positive pressure remediated within 60 days since the initial exceedance?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<ul style="list-style-type: none"> If YES, keep records of Root Cause Analysis. No reporting required. If NO, continue with Corrective Action Analysis and Implementation Plan and submit Notification to state agency within 75 days of initial exceedance. 	



PRESSURE EXCEEDANCE

Corrective Action Analysis and Implementation Schedule

Date of Initial Exceedance:	8/10/2021
Collection Device ID:	NILEW744
Pressure Reading:	1.34

Corrective Action Analysis	
Describe the corrective actions taken to remediate exceedance.	
Wellhead remoted, new lateral installed to restore system vacuum source	

Implementation Schedule	
Expected Start Date:	10/12/2021
Expected Completion Date:	12/3/2021
Provide a description of proposed repairs and/or remedial action required and supporting information for implementation timeframe.	
Wellhead remote run and lateral repair planned during ongoing construction by Guinn Construction	

Final Steps	
Determine the required next steps.	
Is the remediation expected to take less than 120 days since initial exceedance per implementation schedule?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<ul style="list-style-type: none"> • If YES, send notification to state agency within 75 days of initial exceedance. Include Root Cause Analysis, Corrective Action Analysis, and Implementation Schedule in the next NSPS Report. • If NO, send Root Cause Analysis, Corrective Action Analysis, and Implementation Schedule to state agency within 75 days for approval and include in next NSPS Report. 	



Newby Island Landfill 1601 Dixon Landing Road, Milpitas, CA 95035
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October 22, 2021

Tamiko Endow
Senior Air Quality Engineer
Bay Area Air Quality Management District
375 Beale Street, Suite 600
San Francisco, CA 94105

Re: 75-Day Notification of Pressure Exceedances
International Disposal Corp. of California, Milpitas, California
Facility Number A9013

Ms. Endow:

International Disposal Corp. of CA (IDCC), owner and operator of the Newby Island Landfill (Newby), located in Milpitas, California, hereby provides the Bay Area Air Quality Management District (BAAQMD) with a 75-day notification pursuant to the compliance provisions identified in Title 40 of the Code of Federal Regulations (CFR) 60.767(j)(2) for pressure exceedances at landfill gas (LFG) extraction wells NILEW711, NILEW744, and NILEW745 out of an abundance of caution. The three wells are located within the vicinity of construction activities, in which IDCC submitted a Request for Limited Exemption (for Construction Activities) from Regulation 8, Rule 34, Section 118 on May 25, 2021 for construction activities scheduled to take place from June 1, 2021 through December 10, 2021. The Request for Limited Exemption can be found in Attachment A.

The initial pressure exceedances occurred on August 10, 2021 for all three wells. Well NILEW711, NILEW744, and NILEW745 had an initial pressure exceedances of 0.71, 1.34, and 0.01 inches of water ("H₂O"), respectively. For all the wells, corrective actions were initiated within 5 days as the valves were adjusted; however, the wells could not be brought back into compliance within 15 days.

As required under 40 CFR 60.765(a)(5), a root cause analysis was completed within 15 days and a corrective action analysis and implementation schedule was completed within 60 days from the original exceedance for all the wells. Copies of these forms can be found in Attachment B. All the steps for compliance were conducted, however, these wells remain in exceedance but will be remediated prior to the 120-day deadlines. As such, this 75-day notification is required.

If you have any questions or require additional information, please do not hesitate to contact Rachelle Huber at (408) 586-2263 or by email at rhuber2@republicservices.com or Michael Flanagan of SCS Field Services (SCSFS) at 510-363-7796 or by email at MFlanagan@scsengineers.com.

Sincerely,

A handwritten signature in black ink that reads "Rachelle Huber".

Rachelle Huber
Environmental Manager
Newby Island Landfill

cc: Josh Mills, Newby Island

Tamiko Endow
Senior Air Quality Engineer
BAAQMD
October 22, 2021
Page 2

Michael Flanagan, SCS Field Services
Cassandra Drotman, SCS Engineers
Anne Liu, SCS Engineers
Jay Patel, BAAQMD
Administrator, U.S. EPA Region 9

- Attachment A: Request for Limited Exemption (for Construction Activities) from Regulation 8, Rule 34, Section 118
- Attachment B: 15-day Root Cause Analysis Forms and 60-Day Corrective Action Analysis and Implementation Schedule Forms



PRESSURE EXCEEDANCE

Root Cause Analysis

Date of Initial Exceedance:	8/10/2021
Collection Device ID:	NILEW745
Pressure Reading:	0.01

Root Cause Analysis	
Was the reason for the positive pressure due to one of the following:	
A fire or increased well temperature.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Use of a geomembrane or synthetic cover.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
A decommissioned well.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<ul style="list-style-type: none"> • If YES to ANY of the above, exempt as per 40 CFR 62.16720(a)(3)(iii)/ 40 CFR §63.1958(b). • If NO to ALL of the above, continue the form. 	
Describe what was inspected.	
Vacuum source at wellhead (lateral is buried/inaccessible)	
Describe what was determined to be the root cause of the exceedance.	
Lack of vacuum on lateral riser, may be damaged or flooded	
Determine the required next steps.	
Was the positive pressure remediated within 60 days since the initial exceedance?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<ul style="list-style-type: none"> • If YES, keep records of Root Cause Analysis. No reporting required. • If NO, continue with Corrective Action Analysis and Implementation Plan and submit Notification to state agency within 75 days of initial exceedance. 	



PRESSURE EXCEEDANCE

Corrective Action Analysis and Implementation Schedule

Date of Initial Exceedance:	8/10/2021
Collection Device ID:	NILEW745
Pressure Reading:	0.01

Corrective Action Analysis	
Describe the corrective actions taken to remediate exceedance.	
Wellhead remoted, new lateral installed to restore system vacuum source	

Implementation Schedule	
Expected Start Date:	10/12/2021
Expected Completion Date:	12/3/2021
Provide a description of proposed repairs and/or remedial action required and supporting information for implementation timeframe.	
Wellhead remote run and lateral repair planned during ongoing construction by Guinn Construction	

Final Steps	
Determine the required next steps.	
Is the remediation expected to take less than 120 days since initial exceedance per implementation schedule?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<ul style="list-style-type: none"> • If YES, send notification to state agency within 75 days of initial exceedance. Include Root Cause Analysis, Corrective Action Analysis, and Implementation Schedule in the next NSPS Report. • If NO, send Root Cause Analysis, Corrective Action Analysis, and Implementation Schedule to state agency within 75 days for approval and include in next NSPS Report. 	



Newby Island Landfill 1601 Dixon Landing Road, Milpitas, CA 95035
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October 22, 2021

Tamiko Endow
Senior Air Quality Engineer
Bay Area Air Quality Management District
375 Beale Street, Suite 600
San Francisco, CA 94105

Re: 75-Day Notification of Pressure Exceedances
International Disposal Corp. of California, Milpitas, California
Facility Number A9013

Ms. Endow:

International Disposal Corp. of CA (IDCC), owner and operator of the Newby Island Landfill (Newby), located in Milpitas, California, hereby provides the Bay Area Air Quality Management District (BAAQMD) with a 75-day notification pursuant to the compliance provisions identified in Title 40 of the Code of Federal Regulations (CFR) 60.767(j)(2) for pressure exceedances at landfill gas (LFG) extraction wells NILEW711, NILEW744, and NILEW745 out of an abundance of caution. The three wells are located within the vicinity of construction activities, in which IDCC submitted a Request for Limited Exemption (for Construction Activities) from Regulation 8, Rule 34, Section 118 on May 25, 2021 for construction activities scheduled to take place from June 1, 2021 through December 10, 2021. The Request for Limited Exemption can be found in Attachment A.

The initial pressure exceedances occurred on August 10, 2021 for all three wells. Well NILEW711, NILEW744, and NILEW745 had an initial pressure exceedances of 0.71, 1.34, and 0.01 inches of water ("H₂O"), respectively. For all the wells, corrective actions were initiated within 5 days as the valves were adjusted; however, the wells could not be brought back into compliance within 15 days.

As required under 40 CFR 60.765(a)(5), a root cause analysis was completed within 15 days and a corrective action analysis and implementation schedule was completed within 60 days from the original exceedance for all the wells. Copies of these forms can be found in Attachment B. All the steps for compliance were conducted, however, these wells remain in exceedance but will be remediated prior to the 120-day deadlines. As such, this 75-day notification is required.

If you have any questions or require additional information, please do not hesitate to contact Rachelle Huber at (408) 586-2263 or by email at rhuber2@republicservices.com or Michael Flanagan of SCS Field Services (SCSFS) at 510-363-7796 or by email at MFlanagan@scsengineers.com.

Sincerely,

A handwritten signature in black ink that reads "Rachelle Huber".

Rachelle Huber
Environmental Manager
Newby Island Landfill

cc: Josh Mills, Newby Island

Tamiko Endow
Senior Air Quality Engineer
BAAQMD
October 22, 2021
Page 2

Michael Flanagan, SCS Field Services
Cassandra Drotman, SCS Engineers
Anne Liu, SCS Engineers
Jay Patel, BAAQMD
Administrator, U.S. EPA Region 9

- Attachment A: Request for Limited Exemption (for Construction Activities) from Regulation 8, Rule 34, Section 118
- Attachment B: 15-day Root Cause Analysis Forms and 60-Day Corrective Action Analysis and Implementation Schedule Forms



PRESSURE EXCEEDANCE

Root Cause Analysis

Date of Initial Exceedance:	8/23/2021
Collection Device ID:	NILEW674
Pressure Reading:	0.57

Root Cause Analysis	
Was the reason for the positive pressure due to one of the following:	
A fire or increased well temperature.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Use of a geomembrane or synthetic cover.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
A decommissioned well.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<ul style="list-style-type: none"> • If YES to ANY of the above, exempt as per 40 CFR 62.16720(a)(3)(iii)/ 40 CFR §63.1958(b). • If NO to ALL of the above, continue the form. 	
Describe what was inspected.	
Vacuum source at wellhead (lateral is buried/inaccessible)	
Describe what was determined to be the root cause of the exceedance.	
Lack of vacuum on lateral riser, may be damaged or flooded	
Determine the required next steps.	
Was the positive pressure remediated within 60 days since the initial exceedance?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<ul style="list-style-type: none"> • If YES, keep records of Root Cause Analysis. No reporting required. • If NO, continue with Corrective Action Analysis and Implementation Plan and submit Notification to state agency within 75 days of initial exceedance. 	



PRESSURE EXCEEDANCE

Corrective Action Analysis and Implementation Schedule

Date of Initial Exceedance:	8/23/2021
Collection Device ID:	NILEW674
Pressure Reading:	0.57

Corrective Action Analysis	
Describe the corrective actions taken to remediate exceedance.	
Wellhead remoted, new lateral installed to restore system vacuum source	

Implementation Schedule	
Expected Start Date:	11/8/2021
Expected Completion Date:	12/15/2021
Provide a description of proposed repairs and/or remedial action required and supporting information for implementation timeframe.	
Wellhead remote run and lateral repair planned during ongoing construction by Guinn Construction	

Final Steps	
Determine the required next steps.	
Is the remediation expected to take less than 120 days since initial exceedance per implementation schedule?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<ul style="list-style-type: none"> • If YES, send notification to state agency within 75 days of initial exceedance. Include Root Cause Analysis, Corrective Action Analysis, and Implementation Schedule in the next NSPS Report. • If NO, send Root Cause Analysis, Corrective Action Analysis, and Implementation Schedule to state agency within 75 days for approval and include in next NSPS Report. 	



Newby Island Landfill 1601 Dixon Landing Road, Milpitas, CA 95035
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November 5, 2021

Tamiko Endow
Senior Air Quality Engineer
Bay Area Air Quality Management District
375 Beale Street, Suite 600
San Francisco, CA 94105

Re: 75-Day Notification of Pressure Exceedances
International Disposal Corp. of California, Milpitas, California
Facility Number A9013

Ms. Endow:

International Disposal Corp. of CA (IDCC), owner and operator of the Newby Island Landfill (Newby), located in Milpitas, California, hereby provides the Bay Area Air Quality Management District (BAAQMD) with a 75-day notification pursuant to the compliance provisions identified in Title 40 of the Code of Federal Regulations (CFR) 60.767(j)(2) for pressure exceedances at landfill gas (LFG) extraction wells NILEW674, NILCW004, and NILMW015. The two of the three wells (NILEW674 and NILMW015) are located within the vicinity of construction activities, in which IDCC submitted a Request for Limited Exemption (for Construction Activities) from Regulation 8, Rule 34, Section 118 on May 25, 2021 for construction activities scheduled to take place from June 1, 2021 through December 10, 2021. The Request for Limited Exemption can be found in Attachment A.

The initial pressure exceedances occurred at NILEW674, NILCW004, and NILMW015 on August 23, August 28, and August 30, 2021, respectively. The wells had initial pressure exceedances of 0.57, 0.66, and 0.0 inches of water ("H₂O"), respectively. For all the wells, corrective actions were initiated within 5 days as the valves were adjusted; however, the wells could not be brought back into compliance within 15 days.

As required under 40 CFR 60.765(a)(5), a root cause analysis was completed within 15 days and a corrective action analysis and implementation schedule was completed within 60 days from the original exceedance for all the wells. Copies of these forms can be found in Attachment B. NILCW004 came back into compliance on October 29, 2021. All the steps for compliance were conducted, however, the wells in the construction area (NILEW674 and NILMW015) remain in exceedance as of the submittal of this notification. As such, Newby requests an extended corrective action timeline beyond 120-days for wells NILEW674 and NILMW015 per 40 CFR 60.765(a)(3)(iii). As such, this 75-day notification is required.

If you have any questions or require additional information, please do not hesitate to contact Rachelle Huber at (408) 586-2263 or by email at rhuber2@republicservices.com or Michael Flanagan of SCS Field Services (SCSFS) at 510-363-7796 or by email at MFlanagan@scsengineers.com.

Sincerely,

A handwritten signature in blue ink that reads "Rachelle Huber".

Rachelle Huber
Environmental Manager
Newby Island Landfill

Tamiko Endow
Senior Air Quality Engineer
BAAQMD
November 5, 2021
Page 2

cc: Josh Mills, Newby Island
Michael Flanagan, SCS Field Services
Cassandra Drotman, SCS Engineers
Anne Liu, SCS Engineers
Jay Patel, BAAQMD
Administrator, U.S. EPA Region 9

Attachment A: Request for Limited Exemption (for Construction Activities) from Regulation 8, Rule 34, Section 118
Attachment B: 15-day Root Cause Analysis Forms and 60-Day Corrective Action Analysis and Implementation Schedule Forms



PRESSURE EXCEEDANCE

Root Cause Analysis

Date of Initial Exceedance:	8/27/2021
Collection Device ID:	NILEW702
Pressure Reading:	2.89

Root Cause Analysis	
Was the reason for the positive pressure due to one of the following:	
A fire or increased well temperature.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Use of a geomembrane or synthetic cover.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
A decommissioned well.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<ul style="list-style-type: none"> If YES to ANY of the above, exempt as per 40 CFR 62.16720(a)(3)(iii)/ 40 CFR §63.1958(b). If NO to ALL of the above, continue the form. 	
Describe what was inspected.	
Vacuum source at wellhead (lateral is buried/inaccessible)	
Describe what was determined to be the root cause of the exceedance.	
Lack of vacuum on lateral riser, may be damaged or flooded	
Determine the required next steps.	
Was the positive pressure remediated within 60 days since the initial exceedance?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<ul style="list-style-type: none"> If YES, keep records of Root Cause Analysis. No reporting required. If NO, continue with Corrective Action Analysis and Implementation Plan and submit Notification to state agency within 75 days of initial exceedance. 	



PRESSURE EXCEEDANCE

Root Cause Analysis

Date of Initial Exceedance:	8/28/2021
Collection Device ID:	NILCW003
Pressure Reading:	0.10

Root Cause Analysis	
Was the reason for the positive pressure due to one of the following:	
A fire or increased well temperature.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Use of a geomembrane or synthetic cover.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
A decommissioned well.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<ul style="list-style-type: none"> If YES to ANY of the above, exempt as per 40 CFR 62.16720(a)(3)(iii)/ 40 CFR §63.1958(b). If NO to ALL of the above, continue the form. 	
Describe what was inspected.	
Vacuum source at wellhead (lateral is buried/inaccessible)	
Describe what was determined to be the root cause of the exceedance.	
Lack of vacuum on lateral riser, may be damaged or flooded	
Determine the required next steps.	
Was the positive pressure remediated within 60 days since the initial exceedance?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<ul style="list-style-type: none"> If YES, keep records of Root Cause Analysis. No reporting required. If NO, continue with Corrective Action Analysis and Implementation Plan and submit Notification to state agency within 75 days of initial exceedance. 	



PRESSURE EXCEEDANCE

Root Cause Analysis

Date of Initial Exceedance:	8/28/2021
Collection Device ID:	NILCW004
Pressure Reading:	0.66

Root Cause Analysis	
Was the reason for the positive pressure due to one of the following:	
A fire or increased well temperature.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Use of a geomembrane or synthetic cover.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
A decommissioned well.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<ul style="list-style-type: none"> If YES to ANY of the above, exempt as per 40 CFR 62.16720(a)(3)(iii)/ 40 CFR §63.1958(b). If NO to ALL of the above, continue the form. 	
Describe what was inspected.	
Vacuum source at wellhead (lateral is buried/inaccessible)	
Describe what was determined to be the root cause of the exceedance.	
Lack of vacuum on lateral riser, may be damaged or flooded	
Determine the required next steps.	
Was the positive pressure remediated within 60 days since the initial exceedance?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<ul style="list-style-type: none"> If YES, keep records of Root Cause Analysis. No reporting required. If NO, continue with Corrective Action Analysis and Implementation Plan and submit Notification to state agency within 75 days of initial exceedance. 	



PRESSURE EXCEEDANCE

Corrective Action Analysis and Implementation Schedule

Date of Initial Exceedance:	8/26/2021
Collection Device ID:	NILCW004
Pressure Reading:	0.66

Corrective Action Analysis	
Describe the corrective actions taken to remediate exceedance.	
As the risk of an SSO subsides in area, field staff will return vacuum to well.	

Implementation Schedule	
Expected Start Date:	11/8/2021
Expected Completion Date:	12/15/2021
Provide a description of proposed repairs and/or remedial action required and supporting information for implementation timeframe.	
As the risk of an SSO subsides in area, field staff will return vacuum to well.	

Final Steps	
Determine the required next steps.	
Is the remediation expected to take less than 120 days since initial exceedance per implementation schedule?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<ul style="list-style-type: none"> • If YES, send notification to state agency within 75 days of initial exceedance. Include Root Cause Analysis, Corrective Action Analysis, and Implementation Schedule in the next NSPS Report. • If NO, send Root Cause Analysis, Corrective Action Analysis, and Implementation Schedule to state agency within 75 days for approval and include in next NSPS Report. 	



Newby Island Landfill 1601 Dixon Landing Road, Milpitas, CA 95035
o 408.586.2263 c 510.298.7892 republicservices.com

November 5, 2021

Tamiko Endow
Senior Air Quality Engineer
Bay Area Air Quality Management District
375 Beale Street, Suite 600
San Francisco, CA 94105

Re: 75-Day Notification of Pressure Exceedances
International Disposal Corp. of California, Milpitas, California
Facility Number A9013

Ms. Endow:

International Disposal Corp. of CA (IDCC), owner and operator of the Newby Island Landfill (Newby), located in Milpitas, California, hereby provides the Bay Area Air Quality Management District (BAAQMD) with a 75-day notification pursuant to the compliance provisions identified in Title 40 of the Code of Federal Regulations (CFR) 60.767(j)(2) for pressure exceedances at landfill gas (LFG) extraction wells NILEW674, NILCW004, and NILMW015. The two of the three wells (NILEW674 and NILMW015) are located within the vicinity of construction activities, in which IDCC submitted a Request for Limited Exemption (for Construction Activities) from Regulation 8, Rule 34, Section 118 on May 25, 2021 for construction activities scheduled to take place from June 1, 2021 through December 10, 2021. The Request for Limited Exemption can be found in Attachment A.

The initial pressure exceedances occurred at NILEW674, NILCW004, and NILMW015 on August 23, August 28, and August 30, 2021, respectively. The wells had initial pressure exceedances of 0.57, 0.66, and 0.0 inches of water ("H₂O"), respectively. For all the wells, corrective actions were initiated within 5 days as the valves were adjusted; however, the wells could not be brought back into compliance within 15 days.

As required under 40 CFR 60.765(a)(5), a root cause analysis was completed within 15 days and a corrective action analysis and implementation schedule was completed within 60 days from the original exceedance for all the wells. Copies of these forms can be found in Attachment B. NILCW004 came back into compliance on October 29, 2021. All the steps for compliance were conducted, however, the wells in the construction area (NILEW674 and NILMW015) remain in exceedance as of the submittal of this notification. As such, Newby requests an extended corrective action timeline beyond 120-days for wells NILEW674 and NILMW015 per 40 CFR 60.765(a)(3)(iii). As such, this 75-day notification is required.

If you have any questions or require additional information, please do not hesitate to contact Rachelle Huber at (408) 586-2263 or by email at rhuber2@republicservices.com or Michael Flanagan of SCS Field Services (SCSFS) at 510-363-7796 or by email at MFlanagan@scsengineers.com.

Sincerely,

A handwritten signature in blue ink that reads "Rachelle Huber".

Rachelle Huber
Environmental Manager
Newby Island Landfill

Tamiko Endow
Senior Air Quality Engineer
BAAQMD
November 5, 2021
Page 2

cc: Josh Mills, Newby Island
Michael Flanagan, SCS Field Services
Cassandra Drotman, SCS Engineers
Anne Liu, SCS Engineers
Jay Patel, BAAQMD
Administrator, U.S. EPA Region 9

Attachment A: Request for Limited Exemption (for Construction Activities) from Regulation 8, Rule 34, Section 118
Attachment B: 15-day Root Cause Analysis Forms and 60-Day Corrective Action Analysis and Implementation Schedule Forms



PRESSURE EXCEEDANCE

Root Cause Analysis

Date of Initial Exceedance:	8/30/2021
Collection Device ID:	NILMW015
Pressure Reading:	0.70

Root Cause Analysis	
Was the reason for the positive pressure due to one of the following:	
A fire or increased well temperature.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Use of a geomembrane or synthetic cover.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
A decommissioned well.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<ul style="list-style-type: none"> If YES to ANY of the above, exempt as per 40 CFR 62.16720(a)(3)(iii)/ 40 CFR §63.1958(b). If NO to ALL of the above, continue the form. 	
Describe what was inspected.	
Vacuum source at wellhead (lateral is buried/inaccessible)	
Describe what was determined to be the root cause of the exceedance.	
Lack of vacuum on lateral riser, may be damaged or flooded	
Determine the required next steps.	
Was the positive pressure remediated within 60 days since the initial exceedance?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<ul style="list-style-type: none"> If YES, keep records of Root Cause Analysis. No reporting required. If NO, continue with Corrective Action Analysis and Implementation Plan and submit Notification to state agency within 75 days of initial exceedance. 	



PRESSURE EXCEEDANCE

Corrective Action Analysis and Implementation Schedule

Date of Initial Exceedance:	8/30/2021
Collection Device ID:	NILMW015
Pressure Reading:	0.7

Corrective Action Analysis	
Describe the corrective actions taken to remediate exceedance.	
Wellhead remoted, new lateral installed to restore system vacuum source	

Implementation Schedule	
Expected Start Date:	11/8/2021
Expected Completion Date:	12/15/2021
Provide a description of proposed repairs and/or remedial action required and supporting information for implementation timeframe.	
Wellhead remote run and lateral repair planned during ongoing construction by Guinn Construction	

Final Steps	
Determine the required next steps.	
Is the remediation expected to take less than 120 days since initial exceedance per implementation schedule?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<ul style="list-style-type: none"> • If YES, send notification to state agency within 75 days of initial exceedance. Include Root Cause Analysis, Corrective Action Analysis, and Implementation Schedule in the next NSPS Report. • If NO, send Root Cause Analysis, Corrective Action Analysis, and Implementation Schedule to state agency within 75 days for approval and include in next NSPS Report. 	



Newby Island Landfill 1601 Dixon Landing Road, Milpitas, CA 95035
o 408.586.2263 c 510.298.7892 republicservices.com

November 5, 2021

Tamiko Endow
Senior Air Quality Engineer
Bay Area Air Quality Management District
375 Beale Street, Suite 600
San Francisco, CA 94105

Re: 75-Day Notification of Pressure Exceedances
International Disposal Corp. of California, Milpitas, California
Facility Number A9013

Ms. Endow:

International Disposal Corp. of CA (IDCC), owner and operator of the Newby Island Landfill (Newby), located in Milpitas, California, hereby provides the Bay Area Air Quality Management District (BAAQMD) with a 75-day notification pursuant to the compliance provisions identified in Title 40 of the Code of Federal Regulations (CFR) 60.767(j)(2) for pressure exceedances at landfill gas (LFG) extraction wells NILEW674, NILCW004, and NILMW015. The two of the three wells (NILEW674 and NILMW015) are located within the vicinity of construction activities, in which IDCC submitted a Request for Limited Exemption (for Construction Activities) from Regulation 8, Rule 34, Section 118 on May 25, 2021 for construction activities scheduled to take place from June 1, 2021 through December 10, 2021. The Request for Limited Exemption can be found in Attachment A.

The initial pressure exceedances occurred at NILEW674, NILCW004, and NILMW015 on August 23, August 28, and August 30, 2021, respectively. The wells had initial pressure exceedances of 0.57, 0.66, and 0.0 inches of water ("H₂O"), respectively. For all the wells, corrective actions were initiated within 5 days as the valves were adjusted; however, the wells could not be brought back into compliance within 15 days.

As required under 40 CFR 60.765(a)(5), a root cause analysis was completed within 15 days and a corrective action analysis and implementation schedule was completed within 60 days from the original exceedance for all the wells. Copies of these forms can be found in Attachment B. NILCW004 came back into compliance on October 29, 2021. All the steps for compliance were conducted, however, the wells in the construction area (NILEW674 and NILMW015) remain in exceedance as of the submittal of this notification. As such, Newby requests an extended corrective action timeline beyond 120-days for wells NILEW674 and NILMW015 per 40 CFR 60.765(a)(3)(iii). As such, this 75-day notification is required.

If you have any questions or require additional information, please do not hesitate to contact Rachelle Huber at (408) 586-2263 or by email at rhuber2@republicservices.com or Michael Flanagan of SCS Field Services (SCSFS) at 510-363-7796 or by email at MFlanagan@scsengineers.com.

Sincerely,

A handwritten signature in blue ink that reads "Rachelle Huber".

Rachelle Huber
Environmental Manager
Newby Island Landfill

Tamiko Endow
Senior Air Quality Engineer
BAAQMD
November 5, 2021
Page 2

cc: Josh Mills, Newby Island
Michael Flanagan, SCS Field Services
Cassandra Drotman, SCS Engineers
Anne Liu, SCS Engineers
Jay Patel, BAAQMD
Administrator, U.S. EPA Region 9

Attachment A: Request for Limited Exemption (for Construction Activities) from Regulation 8, Rule 34, Section 118
Attachment B: 15-day Root Cause Analysis Forms and 60-Day Corrective Action Analysis and Implementation Schedule Forms



PRESSURE EXCEEDANCE

Root Cause Analysis

Date of Initial Exceedance:	9/8/2021
Collection Device ID:	NIHC17-4
Pressure Reading:	0.01

Root Cause Analysis	
Was the reason for the positive pressure due to one of the following:	
A fire or increased well temperature.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Use of a geomembrane or synthetic cover.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
A decommissioned well.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<ul style="list-style-type: none"> If YES to ANY of the above, exempt as per 40 CFR 62.16720(a)(3)(iii)/ 40 CFR §63.1958(b). If NO to ALL of the above, continue the form. 	
Describe what was inspected.	
Vacuum source at wellhead (lateral is buried/inaccessible)	
Describe what was determined to be the root cause of the exceedance.	
Lack of vacuum on lateral riser, may be damaged or flooded	
Determine the required next steps.	
Was the positive pressure remediated within 60 days since the initial exceedance?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<ul style="list-style-type: none"> If YES, keep records of Root Cause Analysis. No reporting required. If NO, continue with Corrective Action Analysis and Implementation Plan and submit Notification to state agency within 75 days of initial exceedance. 	



PRESSURE EXCEEDANCE

Root Cause Analysis

Date of Initial Exceedance:	9/8/2021
Collection Device ID:	NISS17-6
Pressure Reading:	38.63

Root Cause Analysis	
Was the reason for the positive pressure due to one of the following:	
A fire or increased well temperature.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Use of a geomembrane or synthetic cover.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
A decommissioned well.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<ul style="list-style-type: none"> If YES to ANY of the above, exempt as per 40 CFR 62.16720(a)(3)(iii)/ 40 CFR §63.1958(b). If NO to ALL of the above, continue the form. 	
Describe what was inspected.	
Vacuum source at wellhead (lateral is buried/inaccessible)	
Describe what was determined to be the root cause of the exceedance.	
Lack of vacuum on lateral riser, may be damaged or flooded	
Determine the required next steps.	
Was the positive pressure remediated within 60 days since the initial exceedance?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<ul style="list-style-type: none"> If YES, keep records of Root Cause Analysis. No reporting required. If NO, continue with Corrective Action Analysis and Implementation Plan and submit Notification to state agency within 75 days of initial exceedance. 	



PRESSURE EXCEEDANCE

Root Cause Analysis

Date of Initial Exceedance:	9/9/2021
Collection Device ID:	NI3EW31
Pressure Reading:	5.58

Root Cause Analysis	
Was the reason for the positive pressure due to one of the following:	
A fire or increased well temperature.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Use of a geomembrane or synthetic cover.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
A decommissioned well.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<ul style="list-style-type: none"> If YES to ANY of the above, exempt as per 40 CFR 62.16720(a)(3)(iii)/ 40 CFR §63.1958(b). If NO to ALL of the above, continue the form. 	
Describe what was inspected.	
Vacuum source at wellhead (lateral is buried/inaccessible)	
Describe what was determined to be the root cause of the exceedance.	
Lack of vacuum on lateral riser, may be damaged or flooded	
Determine the required next steps.	
Was the positive pressure remediated within 60 days since the initial exceedance?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<ul style="list-style-type: none"> If YES, keep records of Root Cause Analysis. No reporting required. If NO, continue with Corrective Action Analysis and Implementation Plan and submit Notification to state agency within 75 days of initial exceedance. 	



PRESSURE EXCEEDANCE

Root Cause Analysis

Date of Initial Exceedance:	9/10/2021
Collection Device ID:	NILEW757
Pressure Reading:	3.77

Root Cause Analysis	
Was the reason for the positive pressure due to one of the following:	
A fire or increased well temperature.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Use of a geomembrane or synthetic cover.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
A decommissioned well.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<ul style="list-style-type: none"> If YES to ANY of the above, exempt as per 40 CFR 62.16720(a)(3)(iii)/ 40 CFR §63.1958(b). If NO to ALL of the above, continue the form. 	
Describe what was inspected.	
Vacuum source at wellhead (lateral is buried/inaccessible)	
Describe what was determined to be the root cause of the exceedance.	
Lack of vacuum on lateral riser, may be damaged or flooded	
Determine the required next steps.	
Was the positive pressure remediated within 60 days since the initial exceedance?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<ul style="list-style-type: none"> If YES, keep records of Root Cause Analysis. No reporting required. If NO, continue with Corrective Action Analysis and Implementation Plan and submit Notification to state agency within 75 days of initial exceedance. 	



PRESSURE EXCEEDANCE

Root Cause Analysis

Date of Initial Exceedance:	9/14/2021
Collection Device ID:	NIHC17-2
Pressure Reading:	2.75

Root Cause Analysis	
Was the reason for the positive pressure due to one of the following:	
A fire or increased well temperature.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Use of a geomembrane or synthetic cover.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
A decommissioned well.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<ul style="list-style-type: none"> If YES to ANY of the above, exempt as per 40 CFR 62.16720(a)(3)(iii)/ 40 CFR §63.1958(b). If NO to ALL of the above, continue the form. 	
Describe what was inspected.	
Vacuum source at wellhead (lateral is buried/inaccessible)	
Describe what was determined to be the root cause of the exceedance.	
Lack of vacuum on lateral riser, may be damaged or flooded	
Determine the required next steps.	
Was the positive pressure remediated within 60 days since the initial exceedance?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<ul style="list-style-type: none"> If YES, keep records of Root Cause Analysis. No reporting required. If NO, continue with Corrective Action Analysis and Implementation Plan and submit Notification to state agency within 75 days of initial exceedance. 	



PRESSURE EXCEEDANCE

Root Cause Analysis

Date of Initial Exceedance:	9/14/2021
Collection Device ID:	NIHC17-3
Pressure Reading:	19.98

Root Cause Analysis	
Was the reason for the positive pressure due to one of the following:	
A fire or increased well temperature.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Use of a geomembrane or synthetic cover.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
A decommissioned well.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<ul style="list-style-type: none"> If YES to ANY of the above, exempt as per 40 CFR 62.16720(a)(3)(iii)/ 40 CFR §63.1958(b). If NO to ALL of the above, continue the form. 	
Describe what was inspected.	
Vacuum source at wellhead (lateral is buried/inaccessible)	
Describe what was determined to be the root cause of the exceedance.	
Lack of vacuum on lateral riser, may be damaged or flooded	
Determine the required next steps.	
Was the positive pressure remediated within 60 days since the initial exceedance?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<ul style="list-style-type: none"> If YES, keep records of Root Cause Analysis. No reporting required. If NO, continue with Corrective Action Analysis and Implementation Plan and submit Notification to state agency within 75 days of initial exceedance. 	



PRESSURE EXCEEDANCE

Root Cause Analysis

Date of Initial Exceedance:	9/14/2021
Collection Device ID:	NILCW001
Pressure Reading:	1.55

Root Cause Analysis	
Was the reason for the positive pressure due to one of the following:	
A fire or increased well temperature.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Use of a geomembrane or synthetic cover.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
A decommissioned well.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<ul style="list-style-type: none"> • If YES to <u>ANY</u> of the above, exempt as per 40 CFR 62.16720(a)(3)(iii)/ 40 CFR §63.1958(b). • If NO to <u>ALL</u> of the above, continue the form. 	
Describe what was inspected.	
Vacuum source at wellhead (lateral is buried/inaccessible)	
Describe what was determined to be the root cause of the exceedance.	
Lack of vacuum on lateral riser, may be damaged or flooded	
Determine the required next steps.	
Was the positive pressure remediated within 60 days since the initial exceedance?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<ul style="list-style-type: none"> • If YES, keep records of Root Cause Analysis. No reporting required. • If NO, continue with Corrective Action Analysis and Implementation Plan and submit Notification to state agency within 75 days of initial exceedance. 	



PRESSURE EXCEEDANCE

Root Cause Analysis

Date of Initial Exceedance:	9/14/2021
Collection Device ID:	NILCW002
Pressure Reading:	0.91

Root Cause Analysis	
Was the reason for the positive pressure due to one of the following:	
A fire or increased well temperature.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Use of a geomembrane or synthetic cover.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
A decommissioned well.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<ul style="list-style-type: none"> If YES to ANY of the above, exempt as per 40 CFR 62.16720(a)(3)(iii)/ 40 CFR §63.1958(b). If NO to ALL of the above, continue the form. 	
Describe what was inspected.	
Vacuum source at wellhead (lateral is buried/inaccessible)	
Describe what was determined to be the root cause of the exceedance.	
Lack of vacuum on lateral riser, may be damaged or flooded	
Determine the required next steps.	
Was the positive pressure remediated within 60 days since the initial exceedance?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<ul style="list-style-type: none"> If YES, keep records of Root Cause Analysis. No reporting required. If NO, continue with Corrective Action Analysis and Implementation Plan and submit Notification to state agency within 75 days of initial exceedance. 	



PRESSURE EXCEEDANCE

Root Cause Analysis

Date of Initial Exceedance:	9/14/2021
Collection Device ID:	NILCW003
Pressure Reading:	1.05

Root Cause Analysis	
Was the reason for the positive pressure due to one of the following:	
A fire or increased well temperature.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Use of a geomembrane or synthetic cover.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
A decommissioned well.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<ul style="list-style-type: none"> • If YES to ANY of the above, exempt as per 40 CFR 62.16720(a)(3)(iii)/ 40 CFR §63.1958(b). • If NO to ALL of the above, continue the form. 	
Describe what was inspected.	
Vacuum source at wellhead (lateral is buried/inaccessible)	
Describe what was determined to be the root cause of the exceedance.	
Lack of vacuum on lateral riser, may be damaged or flooded	
Determine the required next steps.	
Was the positive pressure remediated within 60 days since the initial exceedance?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<ul style="list-style-type: none"> • If YES, keep records of Root Cause Analysis. No reporting required. • If NO, continue with Corrective Action Analysis and Implementation Plan and submit Notification to state agency within 75 days of initial exceedance. 	



TEMPERATURE EXCEEDANCE

Root Cause Analysis

Date of Initial Exceedance:	9/14/2021
Collection Device ID:	NILEW733
Temperature Reading:	132.7

Root Cause Analysis	
Has the owner/operator received approval from the state agency to operate at a temperature higher than 55°C (131°F) for this well?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<ul style="list-style-type: none"> If YES, exempt as per 40 CFR 62.16720(a)(4)(iii)/ 40 CFR 63.1958(c). If NO, continue the form. 	
Describe what was inspected.	
Gas Sample and de-watering system.	
Describe what was determined to be the root cause of the exceedance.	
Elevated microbial activity	
Determine the required next steps.	
Was the temperature exceedance remediated within 60 days since the initial exceedance?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<ul style="list-style-type: none"> If YES, keep records of Root Cause Analysis. No reporting required. If NO, continue with Corrective Action Analysis and Implementation Plan and submit Notification to state agency within 75 days of initial exceedance. 	



PRESSURE EXCEEDANCE

Root Cause Analysis

Date of Initial Exceedance:	9/14/2021
Collection Device ID:	NISS17-2
Pressure Reading:	16.63

Root Cause Analysis	
Was the reason for the positive pressure due to one of the following:	
A fire or increased well temperature.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Use of a geomembrane or synthetic cover.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
A decommissioned well.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<ul style="list-style-type: none"> • If YES to ANY of the above, exempt as per 40 CFR 62.16720(a)(3)(iii)/ 40 CFR §63.1958(b). • If NO to ALL of the above, continue the form. 	
Describe what was inspected.	
Vacuum source at wellhead (lateral is buried/inaccessible)	
Describe what was determined to be the root cause of the exceedance.	
Lack of vacuum on lateral riser, may be damaged or flooded	
Determine the required next steps.	
Was the positive pressure remediated within 60 days since the initial exceedance?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<ul style="list-style-type: none"> • If YES, keep records of Root Cause Analysis. No reporting required. • If NO, continue with Corrective Action Analysis and Implementation Plan and submit Notification to state agency within 75 days of initial exceedance. 	



PRESSURE EXCEEDANCE

Root Cause Analysis

Date of Initial Exceedance:	9/16/2021
Collection Device ID:	NIHC17-1
Pressure Reading:	1.68

Root Cause Analysis	
Was the reason for the positive pressure due to one of the following:	
A fire or increased well temperature.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Use of a geomembrane or synthetic cover.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
A decommissioned well.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<ul style="list-style-type: none"> If YES to ANY of the above, exempt as per 40 CFR 62.16720(a)(3)(iii)/ 40 CFR §63.1958(b). If NO to ALL of the above, continue the form. 	
Describe what was inspected.	
Vacuum source at wellhead (lateral is buried/inaccessible)	
Describe what was determined to be the root cause of the exceedance.	
Lack of vacuum on lateral riser, may be damaged or flooded	
Determine the required next steps.	
Was the positive pressure remediated within 60 days since the initial exceedance?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<ul style="list-style-type: none"> If YES, keep records of Root Cause Analysis. No reporting required. If NO, continue with Corrective Action Analysis and Implementation Plan and submit Notification to state agency within 75 days of initial exceedance. 	



PRESSURE EXCEEDANCE

Root Cause Analysis

Date of Initial Exceedance:	9/16/2021
Collection Device ID:	NIHC17-5
Pressure Reading:	0.30

Root Cause Analysis	
Was the reason for the positive pressure due to one of the following:	
A fire or increased well temperature.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Use of a geomembrane or synthetic cover.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
A decommissioned well.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<ul style="list-style-type: none"> If YES to ANY of the above, exempt as per 40 CFR 62.16720(a)(3)(iii)/ 40 CFR §63.1958(b). If NO to ALL of the above, continue the form. 	
Describe what was inspected.	
Vacuum source at wellhead (lateral is buried/inaccessible)	
Describe what was determined to be the root cause of the exceedance.	
Lack of vacuum on lateral riser, may be damaged or flooded	
Determine the required next steps.	
Was the positive pressure remediated within 60 days since the initial exceedance?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<ul style="list-style-type: none"> If YES, keep records of Root Cause Analysis. No reporting required. If NO, continue with Corrective Action Analysis and Implementation Plan and submit Notification to state agency within 75 days of initial exceedance. 	



PRESSURE EXCEEDANCE

Corrective Action Analysis and Implementation Schedule

Date of Initial Exceedance:	9/16/2021
Collection Device ID:	NILHC17-5
Pressure Reading:	0.30

Corrective Action Analysis
Describe the corrective actions taken to remediate exceedance.
Horizontal compromised below grade. Set to be abandoned.

Implementation Schedule	
Expected Start Date:	11/17/2021
Expected Completion Date:	12/17/2021
Provide a description of proposed repairs and/or remedial action required and supporting information for implementation timeframe.	
Removing well from the gas collection system	

Final Steps	
Determine the required next steps.	
Is the remediation expected to take less than 120 days since initial exceedance per implementation schedule?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<ul style="list-style-type: none"> If YES, send notification to state agency within 75 days of initial exceedance. Include Root Cause Analysis, Corrective Action Analysis, and Implementation Schedule in the next NSPS Report. If NO, send Root Cause Analysis, Corrective Action Analysis, and Implementation Schedule to state agency within 75 days for approval and include in next NSPS Report. 	



Newby Island Landfill 1601 Dixon Landing Road, Milpitas, CA 95035
o 408.586.2263 c 510.298.7892 republicservices.com

November 30, 2021

Tamiko Endow
Senior Air Quality Engineer
Bay Area Air Quality Management District
375 Beale Street, Suite 600
San Francisco, CA 94105

Re: 75-Day Notification of Pressure Exceedances
International Disposal Corp. of California, Milpitas, California
Facility Number A9013

Ms. Endow:

International Disposal Corp. of CA (IDCC), owner and operator of the Newby Island Landfill (Newby), located in Milpitas, California, hereby provides the Bay Area Air Quality Management District (BAAQMD) with a 75-day notification pursuant to the compliance provisions identified in Title 40 of the Code of Federal Regulations (CFR) 60.767(j)(2) for pressure exceedances at landfill gas (LFG) extraction wells NIHC17-5 and NILEW464.

The initial pressure exceedances occurred at NIHC17-5 and NILEW464 on September 16 and 22, 2021, respectively. The wells had initial pressure exceedances of 0.30 and 4.55 inches of water ("H₂O"), respectively. For both the wells, corrective actions were initiated within 5 days as the valves were adjusted; however, the wells could not be brought back into compliance within 15 days.

As required under 40 CFR 60.765(a)(5), a root cause analysis was completed within 15 days and a corrective action analysis and implementation schedule was completed within 60 days from the original exceedance for all the wells. Copies of these forms can be found in Attachment A. All the steps for compliance were conducted, however, NILEW464 remains in exceedance as of the submittal of this notification. Please note NIHC17-5 was decommissioned on November 18, 2021. As such, this 75-day notification is required.

If you have any questions or require additional information, please do not hesitate to contact Rachelle Huber at (408) 586-2263 or by email at rhuber2@republicservices.com or Michael Flanagan of SCS Field Services (SCSFS) at 510-363-7796 or by email at MFlanagan@scsengineers.com.

Sincerely,

A handwritten signature in black ink that reads "Rachelle Huber".

Rachelle Huber
Environmental Manager
Newby Island Landfill

cc: Josh Mills, Newby Island
Michael Flanagan, SCS Field Services
Cassandra Drotman, SCS Engineers

Tamiko Endow
Senior Air Quality Engineer
BAAQMD
November 30, 2021
Page 2

Anne Liu, SCS Engineers
Jay Patel, BAAQMD
Administrator, U.S. EPA Region 9

Attachment A: 15-day Root Cause Analysis Forms and 60-Day Corrective Action Analysis and Implementation Schedule Forms



PRESSURE EXCEEDANCE

Root Cause Analysis

Date of Initial Exceedance:	9/17/2021
Collection Device ID:	NIL3EW31
Pressure Reading:	1.36

Root Cause Analysis	
Was the reason for the positive pressure due to one of the following:	
A fire or increased well temperature.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Use of a geomembrane or synthetic cover.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
A decommissioned well.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<ul style="list-style-type: none"> If YES to ANY of the above, exempt as per 40 CFR 62.16720(a)(3)(iii)/ 40 CFR §63.1958(b). If NO to ALL of the above, continue the form. 	
Describe what was inspected.	
Offline for SSO is the radius of influence	
Describe what was determined to be the root cause of the exceedance.	
Elevated CO readings in area	
Determine the required next steps.	
Was the positive pressure remediated within 60 days since the initial exceedance?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<ul style="list-style-type: none"> If YES, keep records of Root Cause Analysis. No reporting required. If NO, continue with Corrective Action Analysis and Implementation Plan and submit Notification to state agency within 75 days of initial exceedance. 	



PRESSURE EXCEEDANCE

Root Cause Analysis

Date of Initial Exceedance:	9/17/2021
Collection Device ID:	NILEW701
Pressure Reading:	6.35

Root Cause Analysis	
Was the reason for the positive pressure due to one of the following:	
A fire or increased well temperature.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Use of a geomembrane or synthetic cover.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
A decommissioned well.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<ul style="list-style-type: none"> If YES to ANY of the above, exempt as per 40 CFR 62.16720(a)(3)(iii)/ 40 CFR §63.1958(b). If NO to ALL of the above, continue the form. 	
Describe what was inspected.	
Vacuum source at wellhead (lateral is buried/inaccessible)	
Describe what was determined to be the root cause of the exceedance.	
Lack of vacuum on lateral riser, may be damaged or flooded	
Determine the required next steps.	
Was the positive pressure remediated within 60 days since the initial exceedance?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<ul style="list-style-type: none"> If YES, keep records of Root Cause Analysis. No reporting required. If NO, continue with Corrective Action Analysis and Implementation Plan and submit Notification to state agency within 75 days of initial exceedance. 	



PRESSURE EXCEEDANCE

Root Cause Analysis

Date of Initial Exceedance:	9/17/2021
Collection Device ID:	NILEW703
Pressure Reading:	4.26

Root Cause Analysis	
Was the reason for the positive pressure due to one of the following:	
A fire or increased well temperature.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Use of a geomembrane or synthetic cover.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
A decommissioned well.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<ul style="list-style-type: none"> • If YES to <u>ANY</u> of the above, exempt as per 40 CFR 62.16720(a)(3)(iii)/ 40 CFR §63.1958(b). • If NO to <u>ALL</u> of the above, continue the form. 	
Describe what was inspected.	
Vacuum source at wellhead (lateral is buried/inaccessible)	
Describe what was determined to be the root cause of the exceedance.	
Lack of vacuum on lateral riser, may be damaged or flooded	
Determine the required next steps.	
Was the positive pressure remediated within 60 days since the initial exceedance?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<ul style="list-style-type: none"> • If YES, keep records of Root Cause Analysis. No reporting required. • If NO, continue with Corrective Action Analysis and Implementation Plan and submit Notification to state agency within 75 days of initial exceedance. 	



PRESSURE EXCEEDANCE

Root Cause Analysis

Date of Initial Exceedance:	9/20/2021
Collection Device ID:	NILEW696
Pressure Reading:	25.29

Root Cause Analysis	
Was the reason for the positive pressure due to one of the following:	
A fire or increased well temperature.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Use of a geomembrane or synthetic cover.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
A decommissioned well.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<ul style="list-style-type: none"> If YES to ANY of the above, exempt as per 40 CFR 62.16720(a)(3)(iii)/ 40 CFR §63.1958(b). If NO to ALL of the above, continue the form. 	
Describe what was inspected.	
Vacuum source at wellhead (lateral is buried/inaccessible)	
Describe what was determined to be the root cause of the exceedance.	
Lack of vacuum on lateral riser, may be damaged or flooded	
Determine the required next steps.	
Was the positive pressure remediated within 60 days since the initial exceedance?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<ul style="list-style-type: none"> If YES, keep records of Root Cause Analysis. No reporting required. If NO, continue with Corrective Action Analysis and Implementation Plan and submit Notification to state agency within 75 days of initial exceedance. 	



PRESSURE EXCEEDANCE

Root Cause Analysis

Date of Initial Exceedance:	9/22/2021
Collection Device ID:	NILEW464
Pressure Reading:	4.55

Root Cause Analysis	
Was the reason for the positive pressure due to one of the following:	
A fire or increased well temperature.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Use of a geomembrane or synthetic cover.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
A decommissioned well.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<ul style="list-style-type: none"> If YES to ANY of the above, exempt as per 40 CFR 62.16720(a)(3)(iii)/ 40 CFR §63.1958(b). If NO to ALL of the above, continue the form. 	
Describe what was inspected.	
Vacuum source at wellhead (lateral is buried/inaccessible)	
Describe what was determined to be the root cause of the exceedance.	
Lack of vacuum on lateral riser, may be damaged or flooded	
Determine the required next steps.	
Was the positive pressure remediated within 60 days since the initial exceedance?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<ul style="list-style-type: none"> If YES, keep records of Root Cause Analysis. No reporting required. If NO, continue with Corrective Action Analysis and Implementation Plan and submit Notification to state agency within 75 days of initial exceedance. 	



PRESSURE EXCEEDANCE

Corrective Action Analysis and Implementation Schedule

Date of Initial Exceedance:	9/22/2021
Collection Device ID:	NILEW464
Pressure Reading:	4.55

Corrective Action Analysis	
Describe the corrective actions taken to remediate exceedance.	
Wellhead remoted, new lateral installed to restore system vacuum source	

Implementation Schedule	
Expected Start Date:	11/8/2021
Expected Completion Date:	12/15/2021
Provide a description of proposed repairs and/or remedial action required and supporting information for implementation timeframe.	
Wellhead remote run and lateral repair planned during ongoing construction by Guinn Construction	

Final Steps	
Determine the required next steps.	
Is the remediation expected to take less than 120 days since initial exceedance per implementation schedule?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<ul style="list-style-type: none"> • If YES, send notification to state agency within 75 days of initial exceedance. Include Root Cause Analysis, Corrective Action Analysis, and Implementation Schedule in the next NSPS Report. • If NO, send Root Cause Analysis, Corrective Action Analysis, and Implementation Schedule to state agency within 75 days for approval and include in next NSPS Report. 	



Newby Island Landfill 1601 Dixon Landing Road, Milpitas, CA 95035
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November 30, 2021

Tamiko Endow
Senior Air Quality Engineer
Bay Area Air Quality Management District
375 Beale Street, Suite 600
San Francisco, CA 94105

Re: 75-Day Notification of Pressure Exceedances
International Disposal Corp. of California, Milpitas, California
Facility Number A9013

Ms. Endow:

International Disposal Corp. of CA (IDCC), owner and operator of the Newby Island Landfill (Newby), located in Milpitas, California, hereby provides the Bay Area Air Quality Management District (BAAQMD) with a 75-day notification pursuant to the compliance provisions identified in Title 40 of the Code of Federal Regulations (CFR) 60.767(j)(2) for pressure exceedances at landfill gas (LFG) extraction wells NIHC17-5 and NILEW464.

The initial pressure exceedances occurred at NIHC17-5 and NILEW464 on September 16 and 22, 2021, respectively. The wells had initial pressure exceedances of 0.30 and 4.55 inches of water ("H₂O"), respectively. For both the wells, corrective actions were initiated within 5 days as the valves were adjusted; however, the wells could not be brought back into compliance within 15 days.

As required under 40 CFR 60.765(a)(5), a root cause analysis was completed within 15 days and a corrective action analysis and implementation schedule was completed within 60 days from the original exceedance for all the wells. Copies of these forms can be found in Attachment A. All the steps for compliance were conducted, however, NILEW464 remains in exceedance as of the submittal of this notification. Please note NIHC17-5 was decommissioned on November 18, 2021. As such, this 75-day notification is required.

If you have any questions or require additional information, please do not hesitate to contact Rachelle Huber at (408) 586-2263 or by email at rhuber2@republicservices.com or Michael Flanagan of SCS Field Services (SCSFS) at 510-363-7796 or by email at MFlanagan@scsengineers.com.

Sincerely,

A handwritten signature in black ink that reads "Rachelle Huber".

Rachelle Huber
Environmental Manager
Newby Island Landfill

cc: Josh Mills, Newby Island
Michael Flanagan, SCS Field Services
Cassandra Drotman, SCS Engineers

Tamiko Endow
Senior Air Quality Engineer
BAAQMD
November 30, 2021
Page 2

Anne Liu, SCS Engineers
Jay Patel, BAAQMD
Administrator, U.S. EPA Region 9

Attachment A: 15-day Root Cause Analysis Forms and 60-Day Corrective Action Analysis and Implementation Schedule Forms



TEMPERATURE EXCEEDANCE

Root Cause Analysis

Date of Initial Exceedance:	9/29/2021
Collection Device ID:	NILEW688
Temperature Reading:	131.1

Root Cause Analysis	
Has the owner/operator received approval from the state agency to operate at a temperature higher than 55°C (131°F) for this well?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<ul style="list-style-type: none"> If YES, exempt as per 40 CFR 62.16720(a)(4)(iii)/ 40 CFR 63.1958(c). If NO, continue the form. 	
Describe what was inspected.	
Gas Sample and de-watering system.	
Describe what was determined to be the root cause of the exceedance.	
Elevated microbial activity	
Determine the required next steps.	
Was the temperature exceedance remediated within 60 days since the initial exceedance?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<ul style="list-style-type: none"> If YES, keep records of Root Cause Analysis. No reporting required. If NO, continue with Corrective Action Analysis and Implementation Plan and submit Notification to state agency within 75 days of initial exceedance. 	



TEMPERATURE EXCEEDANCE

Root Cause Analysis

Date of Initial Exceedance:	9/29/2021
Collection Device ID:	NILEW690
Temperature Reading:	134.8

Root Cause Analysis	
Has the owner/operator received approval from the state agency to operate at a temperature higher than 55°C (131°F) for this well?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<ul style="list-style-type: none"> If YES, exempt as per 40 CFR 62.16720(a)(4)(iii)/ 40 CFR 63.1958(c). If NO, continue the form. 	
Describe what was inspected.	
Gas Sample and de-watering system.	
Describe what was determined to be the root cause of the exceedance.	
Elevated microbial activity	
Determine the required next steps.	
Was the temperature exceedance remediated within 60 days since the initial exceedance?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<ul style="list-style-type: none"> If YES, keep records of Root Cause Analysis. No reporting required. If NO, continue with Corrective Action Analysis and Implementation Plan and submit Notification to state agency within 75 days of initial exceedance. 	



TEMPERATURE EXCEEDANCE

Corrective Action Analysis and Implementation Schedule

Date of Initial Exceedance:	9/29/2021
Collection Device ID:	NILEW690
Temperature Reading:	134.8

Corrective Action Analysis	
Describe the corrective actions taken to remediate exceedance.	
O&M to reduced applied vacuum to well	

Implementation Schedule	
Expected Start Date:	12/1/2021
Expected Completion Date:	1/27/2022
Provide a description of proposed repairs and/or remedial action required and supporting information for implementation timeframe.	
Reduce vacuum/gas extraction. Application for temperature HOV pending approval	

Final Steps	
Determine the required next steps.	
Is the remediation expected to take less than 120 days since initial exceedance per implementation schedule?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<ul style="list-style-type: none"> • If YES, send notification to state agency within 75 days of initial exceedance. Include Root Cause Analysis, Corrective Action Analysis, and Implementation Schedule in the next Annual Report. • If NO, send Root Cause Analysis, Corrective Action Analysis, and Implementation Schedule to state agency within 75 days for approval and include in next Annual Report. 	



Newby Island Landfill 1601 Dixon Landing Road, Milpitas, CA 95035
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December 13, 2021

Tamiko Endow
Senior Air Quality Engineer
Bay Area Air Quality Management District
375 Beale Street, Suite 600
San Francisco, CA 94105

Re: 75-Day Notification of Temperature Exceedances
International Disposal Corp. of California, Milpitas, California
Facility Number A9013

Ms. Endow:

International Disposal Corp. of CA (IDCC), owner and operator of the Newby Island Landfill (Newby), located in Milpitas, California, hereby provides the Bay Area Air Quality Management District (BAAQMD) with a 75-day notification pursuant to the compliance provisions identified in Title 40 of the Code of Federal Regulations (CFR) 60.767(j)(2) for temperature exceedances at NILEW690 and NILEW701.

Well NILEW690 had an initial temperature exceedance of 134.8 degrees Fahrenheit (°F) on September 29, 2021. In addition, well NILEW701 had an initial temperature exceedance of 131.4 degrees °F on October 14, 2021. Corrective actions were initiated within 5 days as the valves were adjusted; however, the wells could not be brought back into compliance within 15 days.

As required under 40 CFR 60.765(a)(5), a root cause analysis was completed within 15 days and a corrective action analysis and implementation schedule was completed within 60 days from the original exceedance for both wells. Copies of these forms are attached. All the steps for compliance were conducted, however, these wells remain in exceedance but will be remediated prior to the 120-day deadlines. As such, this 75-day notification is required.

On February 6, 2020, IDCC submitted a higher operating value (HOV) request to operate NILEW690 and NILEW701 at a temperature of 145 degrees Fahrenheit (°F). IDCC has received conditional approval from the BAAQMD pending approval from the United States Environmental Protection Agency (USEPA). At the time of this submittal, IDCC has followed up with the USEPA regarding the application in August 2020, September 2020, October 2020, April 2021, and August 2021 but no response has been received. The EPA promulgated the revised National Emission Standards for Hazardous Air Pollutants (NESHAP) Subpart AAAA rules, which took effect on September 27, 2021, which allows wells to operate at a temperature of 145°F. In the NESHAP rule, the EPA allows an operating temperature of 145°F, the same temperature as requested with the HOV which was approved by BAAQMD. We believe this implicates EPA approval of a higher temperature of 145°F and that the HOV is approved by both EPA and BAAQMD. Thus, this notification should not be required, however to be conservative and because the 131°F limit is still contained within Newby's permit, this notification is being submitted until BAAQMD confirms that the HOV is now fully approved.

If you have any questions or require additional information, please do not hesitate to contact Rachelle Huber at (408) 586-2263 or by email at rhuber2@republicservices.com or Michael Flanagan 510-363-7796 or by email at MFlanagan@scsengineers.com.

Tamiko Endow
Senior Air Quality Engineer
BAAQMD
December 13, 2021
Page 2

Sincerely,

A handwritten signature in black ink that reads "Rachelle Huber". The signature is written in a cursive, flowing style.

Rachelle Huber
Environmental Manager
Newby Island Landfill

cc: Josh Mills, Newby Island
Michael Flanagan, SCS Field Services
Ray Huff, SCS Engineers
Anne Liu, SCS Engineers
Jay Patel, BAAQMD
Administrator, U.S. EPA Region 9

Attachment A: 15-day Root Cause Analysis Forms and 60-Day Corrective Action Analysis and
Implementation Schedule Forms

Attachment B: Temperature HOV Request



TEMPERATURE EXCEEDANCE

Root Cause Analysis

Date of Initial Exceedance:	9/29/2021
Collection Device ID:	NILEW752
Temperature Reading:	138.6

Root Cause Analysis	
Has the owner/operator received approval from the state agency to operate at a temperature higher than 55°C (131°F) for this well?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<ul style="list-style-type: none"> If YES, exempt as per 40 CFR 62.16720(a)(4)(iii)/ 40 CFR 63.1958(c). If NO, continue the form. 	
Describe what was inspected.	
Gas Sample and de-watering system.	
Describe what was determined to be the root cause of the exceedance.	
Elevated microbial activity	
Determine the required next steps.	
Was the temperature exceedance remediated within 60 days since the initial exceedance?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<ul style="list-style-type: none"> If YES, keep records of Root Cause Analysis. No reporting required. If NO, continue with Corrective Action Analysis and Implementation Plan and submit Notification to state agency within 75 days of initial exceedance. 	



PRESSURE EXCEEDANCE

Root Cause Analysis

Date of Initial Exceedance:	10/7/2021
Collection Device ID:	NILEW700
Pressure Reading:	1.07

Root Cause Analysis	
Was the reason for the positive pressure due to one of the following:	
A fire or increased well temperature.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Use of a geomembrane or synthetic cover.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
A decommissioned well.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<ul style="list-style-type: none"> If YES to ANY of the above, exempt as per 40 CFR 62.16720(a)(3)(iii)/ 40 CFR §63.1958(b). If NO to ALL of the above, continue the form. 	
Describe what was inspected.	
Vacuum source at wellhead (lateral is buried/inaccessible)	
Describe what was determined to be the root cause of the exceedance.	
Lack of vacuum on lateral riser, may be damaged or flooded	
Determine the required next steps.	
Was the positive pressure remediated within 60 days since the initial exceedance?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<ul style="list-style-type: none"> If YES, keep records of Root Cause Analysis. No reporting required. If NO, continue with Corrective Action Analysis and Implementation Plan and submit Notification to state agency within 75 days of initial exceedance. 	



TEMPERATURE EXCEEDANCE

Root Cause Analysis

Date of Initial Exceedance:	10/14/2021
Collection Device ID:	NILEW701
Temperature Reading:	131.4

Root Cause Analysis	
Has the owner/operator received approval from the state agency to operate at a temperature higher than 55°C (131°F) for this well?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<ul style="list-style-type: none"> If YES, exempt as per 40 CFR 62.16720(a)(4)(iii)/ 40 CFR 63.1958(c). If NO, continue the form. 	
Describe what was inspected.	
Gas Sample and de-watering system.	
Describe what was determined to be the root cause of the exceedance.	
Elevated microbial activity	
Determine the required next steps.	
Was the temperature exceedance remediated within 60 days since the initial exceedance?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<ul style="list-style-type: none"> If YES, keep records of Root Cause Analysis. No reporting required. If NO, continue with Corrective Action Analysis and Implementation Plan and submit Notification to state agency within 75 days of initial exceedance. 	



TEMPERATURE EXCEEDANCE

Corrective Action Analysis and Implementation Schedule

Date of Initial Exceedance:	10/14/2021
Collection Device ID:	NILEW701
Temperature Reading:	131.4

Corrective Action Analysis	
Describe the corrective actions taken to remediate exceedance.	
O&M to reduced applied vacuum to well	

Implementation Schedule	
Expected Start Date:	12/1/2021
Expected Completion Date:	2/11/2022
Provide a description of proposed repairs and/or remedial action required and supporting information for implementation timeframe.	
Reduce vacuum/gas extraction. Application for temperature HOV pending approval	

Final Steps	
Determine the required next steps.	
Is the remediation expected to take less than 120 days since initial exceedance per implementation schedule?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<ul style="list-style-type: none"> • If YES, send notification to state agency within 75 days of initial exceedance. Include Root Cause Analysis, Corrective Action Analysis, and Implementation Schedule in the next Annual Report. • If NO, send Root Cause Analysis, Corrective Action Analysis, and Implementation Schedule to state agency within 75 days for approval and include in next Annual Report. 	



Newby Island Landfill 1601 Dixon Landing Road, Milpitas, CA 95035
o 408.586.2263 c 510.298.7892 republicservices.com

December 13, 2021

Tamiko Endow
Senior Air Quality Engineer
Bay Area Air Quality Management District
375 Beale Street, Suite 600
San Francisco, CA 94105

Re: 75-Day Notification of Temperature Exceedances
International Disposal Corp. of California, Milpitas, California
Facility Number A9013

Ms. Endow:

International Disposal Corp. of CA (IDCC), owner and operator of the Newby Island Landfill (Newby), located in Milpitas, California, hereby provides the Bay Area Air Quality Management District (BAAQMD) with a 75-day notification pursuant to the compliance provisions identified in Title 40 of the Code of Federal Regulations (CFR) 60.767(j)(2) for temperature exceedances at NILEW690 and NILEW701.

Well NILEW690 had an initial temperature exceedance of 134.8 degrees Fahrenheit (°F) on September 29, 2021. In addition, well NILEW701 had an initial temperature exceedance of 131.4 degrees °F on October 14, 2021. Corrective actions were initiated within 5 days as the valves were adjusted; however, the wells could not be brought back into compliance within 15 days.

As required under 40 CFR 60.765(a)(5), a root cause analysis was completed within 15 days and a corrective action analysis and implementation schedule was completed within 60 days from the original exceedance for both wells. Copies of these forms are attached. All the steps for compliance were conducted, however, these wells remain in exceedance but will be remediated prior to the 120-day deadlines. As such, this 75-day notification is required.

On February 6, 2020, IDCC submitted a higher operating value (HOV) request to operate NILEW690 and NILEW701 at a temperature of 145 degrees Fahrenheit (°F). IDCC has received conditional approval from the BAAQMD pending approval from the United States Environmental Protection Agency (USEPA). At the time of this submittal, IDCC has followed up with the USEPA regarding the application in August 2020, September 2020, October 2020, April 2021, and August 2021 but no response has been received. The EPA promulgated the revised National Emission Standards for Hazardous Air Pollutants (NESHAP) Subpart AAAA rules, which took effect on September 27, 2021, which allows wells to operate at a temperature of 145°F. In the NESHAP rule, the EPA allows an operating temperature of 145°F, the same temperature as requested with the HOV which was approved by BAAQMD. We believe this implicates EPA approval of a higher temperature of 145°F and that the HOV is approved by both EPA and BAAQMD. Thus, this notification should not be required, however to be conservative and because the 131°F limit is still contained within Newby's permit, this notification is being submitted until BAAQMD confirms that the HOV is now fully approved.

If you have any questions or require additional information, please do not hesitate to contact Rachelle Huber at (408) 586-2263 or by email at rhuber2@republicservices.com or Michael Flanagan 510-363-7796 or by email at MFlanagan@scsengineers.com.

Tamiko Endow
Senior Air Quality Engineer
BAAQMD
December 13, 2021
Page 2

Sincerely,

A handwritten signature in black ink that reads "Rachelle Huber". The signature is written in a cursive, flowing style.

Rachelle Huber
Environmental Manager
Newby Island Landfill

cc: Josh Mills, Newby Island
Michael Flanagan, SCS Field Services
Ray Huff, SCS Engineers
Anne Liu, SCS Engineers
Jay Patel, BAAQMD
Administrator, U.S. EPA Region 9

Attachment A: 15-day Root Cause Analysis Forms and 60-Day Corrective Action Analysis and
Implementation Schedule Forms

Attachment B: Temperature HOV Request



PRESSURE EXCEEDANCE

Root Cause Analysis

Date of Initial Exceedance:	10/22/2021
Collection Device ID:	NILEW496
Pressure Reading:	13.45

Root Cause Analysis	
Was the reason for the positive pressure due to one of the following:	
A fire or increased well temperature.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Use of a geomembrane or synthetic cover.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
A decommissioned well.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<ul style="list-style-type: none"> If YES to ANY of the above, exempt as per 40 CFR 62.16720(a)(3)(iii)/ 40 CFR §63.1958(b). If NO to ALL of the above, continue the form. 	
Describe what was inspected.	
Vacuum source at wellhead (lateral is buried/inaccessible)	
Describe what was determined to be the root cause of the exceedance.	
Lack of vacuum on lateral riser, may be damaged or flooded	
Determine the required next steps.	
Was the positive pressure remediated within 60 days since the initial exceedance?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<ul style="list-style-type: none"> If YES, keep records of Root Cause Analysis. No reporting required. If NO, continue with Corrective Action Analysis and Implementation Plan and submit Notification to state agency within 75 days of initial exceedance. 	



PRESSURE EXCEEDANCE

Root Cause Analysis

Date of Initial Exceedance:	10/22/2021
Collection Device ID:	NILEW733
Pressure Reading:	2.82

Root Cause Analysis	
Was the reason for the positive pressure due to one of the following:	
A fire or increased well temperature.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Use of a geomembrane or synthetic cover.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
A decommissioned well.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<ul style="list-style-type: none"> • If YES to ANY of the above, exempt as per 40 CFR 62.16720(a)(3)(iii)/ 40 CFR §63.1958(b). • If NO to ALL of the above, continue the form. 	
Describe what was inspected.	
Vacuum source at wellhead (lateral is buried/inaccessible)	
Describe what was determined to be the root cause of the exceedance.	
Lack of vacuum on lateral riser, may be damaged or flooded	
Determine the required next steps.	
Was the positive pressure remediated within 60 days since the initial exceedance?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<ul style="list-style-type: none"> • If YES, keep records of Root Cause Analysis. No reporting required. • If NO, continue with Corrective Action Analysis and Implementation Plan and submit Notification to state agency within 75 days of initial exceedance. 	



TEMPERATURE EXCEEDANCE

Root Cause Analysis

Date of Initial Exceedance:	11/2/2021
Collection Device ID:	NILEW752
Temperature Reading:	136.2

Root Cause Analysis	
Has the owner/operator received approval from the state agency to operate at a temperature higher than 55°C (131°F) for this well?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<ul style="list-style-type: none"> If YES, exempt as per 40 CFR 62.16720(a)(4)(iii)/ 40 CFR 63.1958(c). If NO, continue the form. 	
Describe what was inspected.	
Gas Sample and de-watering system.	
Describe what was determined to be the root cause of the exceedance.	
Elevated microbial activity	
Determine the required next steps.	
Was the temperature exceedance remediated within 60 days since the initial exceedance?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<ul style="list-style-type: none"> If YES, keep records of Root Cause Analysis. No reporting required. If NO, continue with Corrective Action Analysis and Implementation Plan and submit Notification to state agency within 75 days of initial exceedance. 	



PRESSURE EXCEEDANCE

Root Cause Analysis

Date of Initial Exceedance:	11/11/2021
Collection Device ID:	NILEW707
Pressure Reading:	14.95

Root Cause Analysis	
Was the reason for the positive pressure due to one of the following:	
A fire or increased well temperature.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Use of a geomembrane or synthetic cover.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
A decommissioned well.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<ul style="list-style-type: none"> • If YES to <u>ANY</u> of the above, exempt as per 40 CFR 62.16720(a)(3)(iii)/ 40 CFR §63.1958(b). • If NO to <u>ALL</u> of the above, continue the form. 	
Describe what was inspected.	
Vacuum source at wellhead (lateral is buried/inaccessible)	
Describe what was determined to be the root cause of the exceedance.	
Lack of vacuum on lateral riser, due to construction	
Determine the required next steps.	
Was the positive pressure remediated within 60 days since the initial exceedance?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<ul style="list-style-type: none"> • If YES, keep records of Root Cause Analysis. No reporting required. • If NO, continue with Corrective Action Analysis and Implementation Plan and submit Notification to state agency within 75 days of initial exceedance. 	



TEMPERATURE EXCEEDANCE

Root Cause Analysis

Date of Initial Exceedance:	11/16/2021
Collection Device ID:	NILEW735
Temperature Reading:	132.5

Root Cause Analysis	
Has the owner/operator received approval from the state agency to operate at a temperature higher than 55°C (131°F) for this well?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<ul style="list-style-type: none"> If YES, exempt as per 40 CFR 62.16720(a)(4)(iii)/ 40 CFR 63.1958(c). If NO, continue the form. 	
Describe what was inspected.	
Gas Sample and de-watering system.	
Describe what was determined to be the root cause of the exceedance.	
Elevated microbial activity	
Determine the required next steps.	
Was the temperature exceedance remediated within 60 days since the initial exceedance?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<ul style="list-style-type: none"> If YES, keep records of Root Cause Analysis. No reporting required. If NO, continue with Corrective Action Analysis and Implementation Plan and submit Notification to state agency within 75 days of initial exceedance. 	



PRESSURE EXCEEDANCE

Root Cause Analysis

Date of Initial Exceedance:	12/13/2021
Collection Device ID:	NILEW628
Pressure Reading:	11.82

Root Cause Analysis	
Was the reason for the positive pressure due to one of the following:	
A fire or increased well temperature.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Use of a geomembrane or synthetic cover.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
A decommissioned well.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<ul style="list-style-type: none"> If YES to ANY of the above, exempt as per 40 CFR 62.16720(a)(3)(iii)/ 40 CFR §63.1958(b). If NO to ALL of the above, continue the form. 	
Describe what was inspected.	
Vacuum source at wellhead (lateral is buried/inaccessible)	
Describe what was determined to be the root cause of the exceedance.	
Lack of vacuum on lateral riser, due to construction	
Determine the required next steps.	
Was the positive pressure remediated within 60 days since the initial exceedance?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<ul style="list-style-type: none"> If YES, keep records of Root Cause Analysis. No reporting required. If NO, continue with Corrective Action Analysis and Implementation Plan and submit Notification to state agency within 75 days of initial exceedance. 	



PRESSURE EXCEEDANCE

Corrective Action Analysis and Implementation Schedule

Date of Initial Exceedance:	12/13/2021
Collection Device ID:	NILEW628
Pressure Reading:	11.82

Corrective Action Analysis
Describe the corrective actions taken to remediate exceedance.
Well to be decommissioned and abandoned within spring 2022 construction event.

Implementation Schedule	
Expected Start Date:	2/28/2022
Expected Completion Date:	4/1/2022
Provide a description of proposed repairs and/or remedial action required and supporting information for implementation timeframe.	
Well to be decommissioned and abandoned within spring 2022 construction event.	

Final Steps	
Determine the required next steps.	
Is the remediation expected to take less than 120 days since initial exceedance per implementation schedule?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<ul style="list-style-type: none"> If YES, send notification to state agency within 75 days of initial exceedance. Include Root Cause Analysis, Corrective Action Analysis, and Implementation Schedule in the next NSPS Report. If NO, send Root Cause Analysis, Corrective Action Analysis, and Implementation Schedule to state agency within 75 days for approval and include in next NSPS Report. 	



Newby Island Landfill 1601 Dixon Landing Road, Milpitas, CA 95035
o 408.586.2263 c 510.298.7892 republicservices.com

February 24, 2022

Tamiko Endow
Senior Air Quality Engineer
Bay Area Air Quality Management District
375 Beale Street, Suite 600
San Francisco, CA 94105

Re: 75-Day Notification of Pressure Exceedance
International Disposal Corp. of California, Milpitas, California
Facility Number A9013

Ms. Endow:

International Disposal Corp. of CA (IDCC), owner and operator of the Newby Island Sanitary Landfill and Recyclery (Newby), located in Milpitas, California, hereby provides the Bay Area Air Quality Management District (BAAQMD) with a 75-day notification pursuant to the compliance provisions identified in Title 40 of the Code of Federal Regulations (CFR) 60.767(j)(2) and 40 CFR 63.1981(j)(1) for a pressure exceedance at landfill gas (LFG) extraction well NILEW628.

The initial pressure exceedance occurred at NILEW628 on December 13, 2021. The well had an initial pressure exceedance of 11.82 inches of water ("H₂O"). Corrective actions were initiated within 5 days as the valves were adjusted; however, the well could not be brought back into compliance within 15 days. As required under 40 CFR 60.765(a)(5) and 40 CFR 63.1960(a)(3)(i)(A), a root cause analysis was completed within 60 days from the original exceedance for the well. When the well could not be corrected within 60 days, a corrective action analysis and implementation schedule was completed. These forms are available on site for review and will be included in the next semi-annual report. All the steps for compliance were conducted, however, NILEW628 remains in exceedance as of the submittal of this notification. As such, this 75-day notification is required. The well is planned to be decommissioned and remediated before its 120-day deadline.

If you have any questions or require additional information, please do not hesitate to contact Rachelle Huber at (408) 586-2263 or by email at rhuber2@republicservices.com or Michael Flanagan of SCS Field Services (SCSFS) at 510-363-7796 or by email at MFlanagan@scsengineers.com.

Sincerely,

A handwritten signature in blue ink that reads "Rachelle Huber".

Rachelle Huber
Environmental Manager
Newby Island Landfill

Tamiko Endow
Senior Air Quality Engineer
BAAQMD
February 24, 2022
Page 2

cc: Josh Mills, Newby Island
Michael Flanagan, SCS Field Services
Maria Bowen, SCS Engineers
Jay Patel, BAAQMD
Administrator, U.S. EPA Region 9



TEMPERATURE EXCEEDANCE

Root Cause Analysis

Date of Initial Exceedance:	1/7/2022
Collection Device ID:	NILEW752
Temperature Reading:	132.4

Root Cause Analysis	
Has the owner/operator received approval from the state agency to operate at a temperature higher than 55°C (131°F) for this well?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<ul style="list-style-type: none"> If YES, exempt as per 40 CFR 62.16720(a)(4)(iii)/ 40 CFR 63.1958(c). If NO, continue the form. 	
Describe what was inspected.	
Gas Sample and de-watering system.	
Describe what was determined to be the root cause of the exceedance.	
Elevated microbial activity	
Determine the required next steps.	
Was the temperature exceedance remediated within 60 days since the initial exceedance?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<ul style="list-style-type: none"> If YES, keep records of Root Cause Analysis. No reporting required. If NO, continue with Corrective Action Analysis and Implementation Plan and submit Notification to state agency within 75 days of initial exceedance. 	



PRESSURE EXCEEDANCE

Root Cause Analysis

Date of Initial Exceedance:	1/13/2022
Collection Device ID:	NILEW699
Pressure Reading:	0.01

Root Cause Analysis	
Was the reason for the positive pressure due to one of the following:	
A fire or increased well temperature.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Use of a geomembrane or synthetic cover.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
A decommissioned well.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<ul style="list-style-type: none"> If YES to ANY of the above, exempt as per 40 CFR 62.16720(a)(3)(iii)/ 40 CFR §63.1958(b). If NO to ALL of the above, continue the form. 	
Describe what was inspected.	
Vacuum source at wellhead (lateral is buried/inaccessible)	
Describe what was determined to be the root cause of the exceedance.	
Lack of vacuum on lateral riser, due to construction	
Determine the required next steps.	
Was the positive pressure remediated within 60 days since the initial exceedance?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<ul style="list-style-type: none"> If YES, keep records of Root Cause Analysis. No reporting required. If NO, continue with Corrective Action Analysis and Implementation Plan and submit Notification to state agency within 75 days of initial exceedance. 	



TEMPERATURE EXCEEDANCE

Root Cause Analysis

Date of Initial Exceedance:	1/17/2022
Collection Device ID:	NILEW690
Temperature Reading:	133.4

Root Cause Analysis	
Has the owner/operator received approval from the state agency to operate at a temperature higher than 55°C (131°F) for this well?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<ul style="list-style-type: none"> If YES, exempt as per 40 CFR 62.16720(a)(4)(iii)/ 40 CFR 63.1958(c). If NO, continue the form. 	
Describe what was inspected.	
Gas Sample and de-watering system.	
Describe what was determined to be the root cause of the exceedance.	
Elevated microbial activity	
Determine the required next steps.	
Was the temperature exceedance remediated within 60 days since the initial exceedance?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<ul style="list-style-type: none"> If YES, keep records of Root Cause Analysis. No reporting required. If NO, continue with Corrective Action Analysis and Implementation Plan and submit Notification to state agency within 75 days of initial exceedance. 	



PRESSURE EXCEEDANCE

Root Cause Analysis

Date of Initial Exceedance:	1/20/2022
Collection Device ID:	NILHC246
Pressure Reading:	1.34

Root Cause Analysis	
Was the reason for the positive pressure due to one of the following:	
A fire or increased well temperature.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Use of a geomembrane or synthetic cover.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
A decommissioned well.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<ul style="list-style-type: none"> If YES to ANY of the above, exempt as per 40 CFR 62.16720(a)(3)(iii)/ 40 CFR §63.1958(b). If NO to ALL of the above, continue the form. 	
Describe what was inspected.	
Vacuum source at wellhead (lateral is buried/inaccessible)	
Describe what was determined to be the root cause of the exceedance.	
Lack of vacuum on lateral riser, due to construction	
Determine the required next steps.	
Was the positive pressure remediated within 60 days since the initial exceedance?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<ul style="list-style-type: none"> If YES, keep records of Root Cause Analysis. No reporting required. If NO, continue with Corrective Action Analysis and Implementation Plan and submit Notification to state agency within 75 days of initial exceedance. 	



PRESSURE EXCEEDANCE

Root Cause Analysis

Date of Initial Exceedance:	1/20/2022
Collection Device ID:	NILHC247
Pressure Reading:	1.31

Root Cause Analysis	
Was the reason for the positive pressure due to one of the following:	
A fire or increased well temperature.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Use of a geomembrane or synthetic cover.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
A decommissioned well.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<ul style="list-style-type: none"> If YES to ANY of the above, exempt as per 40 CFR 62.16720(a)(3)(iii)/ 40 CFR §63.1958(b). If NO to ALL of the above, continue the form. 	
Describe what was inspected.	
Vacuum source at wellhead (lateral is buried/inaccessible)	
Describe what was determined to be the root cause of the exceedance.	
Lack of vacuum on lateral riser, due to construction	
Determine the required next steps.	
Was the positive pressure remediated within 60 days since the initial exceedance?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<ul style="list-style-type: none"> If YES, keep records of Root Cause Analysis. No reporting required. If NO, continue with Corrective Action Analysis and Implementation Plan and submit Notification to state agency within 75 days of initial exceedance. 	



PRESSURE EXCEEDANCE

Root Cause Analysis

Date of Initial Exceedance:	1/20/2022
Collection Device ID:	NILHC248
Pressure Reading:	1.23

Root Cause Analysis	
Was the reason for the positive pressure due to one of the following:	
A fire or increased well temperature.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Use of a geomembrane or synthetic cover.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
A decommissioned well.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<ul style="list-style-type: none"> If YES to ANY of the above, exempt as per 40 CFR 62.16720(a)(3)(iii)/ 40 CFR §63.1958(b). If NO to ALL of the above, continue the form. 	
Describe what was inspected.	
Vacuum source at wellhead (lateral is buried/inaccessible)	
Describe what was determined to be the root cause of the exceedance.	
Lack of vacuum on lateral riser, due to construction	
Determine the required next steps.	
Was the positive pressure remediated within 60 days since the initial exceedance?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<ul style="list-style-type: none"> If YES, keep records of Root Cause Analysis. No reporting required. If NO, continue with Corrective Action Analysis and Implementation Plan and submit Notification to state agency within 75 days of initial exceedance. 	



PRESSURE EXCEEDANCE

Root Cause Analysis

Date of Initial Exceedance:	1/20/2022
Collection Device ID:	NILHC249
Pressure Reading:	1.19

Root Cause Analysis	
Was the reason for the positive pressure due to one of the following:	
A fire or increased well temperature.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Use of a geomembrane or synthetic cover.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
A decommissioned well.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<ul style="list-style-type: none"> • If YES to <u>ANY</u> of the above, exempt as per 40 CFR 62.16720(a)(3)(iii)/ 40 CFR §63.1958(b). • If NO to <u>ALL</u> of the above, continue the form. 	
Describe what was inspected.	
Vacuum source at wellhead (lateral is buried/inaccessible)	
Describe what was determined to be the root cause of the exceedance.	
Lack of vacuum on lateral riser, due to construction	
Determine the required next steps.	
Was the positive pressure remediated within 60 days since the initial exceedance?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<ul style="list-style-type: none"> • If YES, keep records of Root Cause Analysis. No reporting required. • If NO, continue with Corrective Action Analysis and Implementation Plan and submit Notification to state agency within 75 days of initial exceedance. 	



PRESSURE EXCEEDANCE

Root Cause Analysis

Date of Initial Exceedance:	1/20/2022
Collection Device ID:	NILHC250
Pressure Reading:	1.16

Root Cause Analysis	
Was the reason for the positive pressure due to one of the following:	
A fire or increased well temperature.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Use of a geomembrane or synthetic cover.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
A decommissioned well.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<ul style="list-style-type: none"> • If YES to ANY of the above, exempt as per 40 CFR 62.16720(a)(3)(iii)/ 40 CFR §63.1958(b). • If NO to ALL of the above, continue the form. 	
Describe what was inspected.	
Vacuum source at wellhead (lateral is buried/inaccessible)	
Describe what was determined to be the root cause of the exceedance.	
Lack of vacuum on lateral riser, due to construction	
Determine the required next steps.	
Was the positive pressure remediated within 60 days since the initial exceedance?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<ul style="list-style-type: none"> • If YES, keep records of Root Cause Analysis. No reporting required. • If NO, continue with Corrective Action Analysis and Implementation Plan and submit Notification to state agency within 75 days of initial exceedance. 	

Appendix E – Title V Semi-Annual Report

NEWBY ISLAND LANDFILL
TITLE V SEMI-ANNUAL MONITORING REPORT

SITE: NEWBY ISLAND LANDFILL	FACILITY ID#: A9013
REPORTING PERIOD: <i>from</i> 08/01/2021 <i>through</i> 01/31/2022	

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:



02/22/2022

Signature of Responsible Official

Date

Daniel North
Name of Responsible Official (please print)

General Manager
Title of Responsible Official (please print)

Mail to:

*Director of Compliance and Enforcement
BAAQMD
375 Beale Street, Suite 600
San Francisco, CA 94105
Attn: Title V reports*

NEWBY ISLAND LANDFILL

TITLE V SEMI-ANNUAL MONITORING REPORT

SITE: NEWBY ISLAND LANDFILL	FACILITY ID#: A9013
REPORTING PERIOD: <i>from</i> 08/01/2021 <i>through</i> 01/31/2022	

List of Permitted Sources and Abatement Device

Permit Unit Number	Equipment Description
S-#	Description
S-2	Newby Island Sanitary Landfill – Waste Decomposition Process; Equipped with Landfill Gas Collection System
S-3	Composting Operation; A-3 Water Truck
S-4	Non-retail Gasoline Dispensing Facility
S-5	Newby Island Sanitary Landfill – Waste and Cover Material Dumping
S-6	Newby Island Sanitary Landfill – Excavating, Bulldozing and Compacting Activities
S-7	Diesel engine Powering Air Compressor
S-8 and S-9	Horizontal Grinder/Operations, Trommel Screen/Operations
S-10	Screening/Separating, Multi-material Recycling Sorting Line
S-153	Portable Self-Propelled Horizontal Grinder with Conveyor
S-156	Portable Diesel Engine Propel/Power Grinder
S-1003	Composting, aerated static piles, Green waste Composting Operations
S-1008	Waste material grinding, Multi-material Portable Tub Grinder
S-1009	Screening/Separating, Green waste, Portable Power Screen
S-1038	Portable Diesel Engine Powering 3300 Screen
S-1040	Portable Diesel Engine Powering Power Screen
S-1042	Portable Diesel Engine Powering Power Screen
S-1043	Screening/Separating, Green waste, Portable 3300 Screen
S-1055	Stationary Prime Diesel Engine Powering CASP Blower
S-1056	Stationary Prime Diesel Engine Powering CASP Blower
S-1057	Portable Backup Prime Diesel Engine
A-2	Landfill Gas Flare
A-3	Landfill Gas Flare

Newby also maintains a Title V Permit (Facility No. A9013), which expired on December 20, 2017. On June 20, 2017, a Title V Renewal Application was submitted to the Bay Area Air Quality Management District (BAAQMD). The site currently operates under an application shield. On November 30, 2021, Mr. Dennis Jang with the BAAQMD informed IDCC that the renewal application (Application Number [A/N] 28723) is open and in process and another renewal application will not be needed.

The conditions listed below are incorporated in the BAAQMD Permit to Operate (PTO) that expired August 1, 2022 but has not yet been incorporated into the Title V permit. All conditions have been reviewed for compliance, and the site is in compliance.

- Condition #24887 – applies to S#4;
- Condition #26046 – applies to S#7, 8, 9, 10;
- Condition #26606 – applies to S#1008;
- Condition #26607 – applies to S#1040;
- Condition #26608 – applies to S#1009;
- Condition #26609 – applies to S#1042;
- Condition #26610 – applies to S#1043;
- Condition #26611 – applies to S#1038;
- Condition #27359 – applies to S#153

Records to confirm if S-1042 was operated in one on-site location for less than 12 consecutive months was not available at the time of the submittal and will be confirmed in the following submittals (Condition 26609 Part 1).

On July 21, 2021, Newby received the following permit conditions for S-1055, 1056, and 1057.

- Condition #27446 – applies S#1057; and
- Condition #27477 – applies to S#1055, 1056.

Please note that IDCC does not own the engines for S-1055, 1056, and 1057. As such, IDCC is inquiring with the owners, United Rentals, how to comply with the following permit conditions as the site does not have full autonomy on the equipment. IDCC followed up with the BAAQMD for recommendations on how to comply with these conditions under these circumstances. At this time, no recommendation has been provided by the BAAQMD.

- Condition 27446 Part 10
- Condition 27447 Part 2 and 3

Newby also maintains an Authority to Construct (ATC) A/N 28472 for the S-1003 Covered Aerated Static Pile (CASP) Composting Operation and the S-15 Mixed Waste Stockpiles. The ATCs for the S-1003 CASP Composting Operation and S-15 Mixed Waste Stockpiles were issued on November 21, 2017, were extended via approval email from the BAAQMD on November 21, 2019, and expired on November 21, 2021. On September 21, 2021, IDCC submitted a request to extend the ATC. On October 18, 2021, the BAAQMD informed IDCC that the ATC will not be cancelled. All conditions have been reviewed for compliance this reporting period and there was one deviation of the ATC.

- On August 17, 2021, NOV Number A55724 was issued by BAAQMD Inspector, Mr. Jay Patel, to Newby Island for an alleged violation of BAAQMD Regulation 1, Section 301 (Public Nuisance) for alleged odor complaints that were reported on July 19, 2021. For additional information, including corrective actions taken, please refer to the August 27, 2021 10-day Response Letter.

NEWBY ISLAND LANDFILL

TITLE V SEMI-ANNUAL MONITORING REPORT

Site: Newby Island Landfill	Facility ID#: A9013
Permitted Unit: S-2 WASTE DECOMPOSITION PROCESS WITH GAS COLLECTION SYSTEM, A-2 AND A-3 LANDFILL GAS FLARE; S-5 WASTE AND COVER MATERIAL DUMPING; S-6 EXCAVATING, BULLDOZING, AND COMPACTING ACTIVITIES	Reporting Period: from 08/01/2021 through 01/31/2022

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
Collection System Installation Dates	BAAQMD 8-34-501.7 and 501.8 and BAAQMD Condition # 10423, Part 13b, 13c, 13f, 13g	Records	Periodic / On event basis	BAAQMD 8-34-304.2	For Active Areas: Collection system components must be installed and operating by 5 years + 60 days after initial waste placement	Continuous	N/A
Collection System Installation Dates	BAAQMD 8-34-501.7 and 501.8 and BAAQMD Condition # 10423, Part 13b, 13c, 13f, 13g	Records	Periodic / On event basis	BAAQMD 8-34-304.3	For Any Uncontrolled Areas or Cells: collection system components must be installed and operating within 60 days after the uncontrolled area or cell accumulates 1,000,000 tons of decomposable waste	Continuous	N/A
Gas Flow	BAAQMD 8-34-501.10 and 508	Gas Flow Meter and Recorder (every 15 minutes)	Continuous	BAAQMD 8-34-301 and 301.1	Landfill gas collection system shall operate continuously and all collected gases shall be vented to a properly operating control system	Intermittent	On August 17, 2021, high gas flow caused the A-2 and A-3 Flares to automatically shut down. For additional information, including corrective actions taken, please refer to the August 27, 2021 30-day Breakdown Report for RCA IDs 08B36 and 08B37; 08B38 and 08B39.

NEWBY ISLAND LANDFILL

TITLE V SEMI-ANNUAL MONITORING REPORT

Site: Newby Island Landfill	Facility ID#: A9013
Permitted Unit: S-2 WASTE DECOMPOSITION PROCESS WITH GAS COLLECTION SYSTEM, A-2 AND A-3 LANDFILL GAS FLARE; S-5 WASTE AND COVER MATERIAL DUMPING; S-6 EXCAVATING, BULLDOZING, AND COMPACTING ACTIVITIES	Reporting Period: from 08/01/2021 through 01/31/2022

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
						Intermittent	On August 23, 2021, a flame failure condition occurred at the A-2 and A-3 Flares, brought about by surging in the header, caused the GCCS to shut down. For additional information, including corrective actions taken, please refer to the September 2, 2021 30-day Breakdown Report for RCA IDs 08B44 and 08B45.
						Intermittent	On August 24, 2021, a flame failure condition occurred at the A-2 and A-3 Flares, brought about by surging in the header, caused the GCCS to shut down. For additional information, including corrective actions taken, please refer to the September 2, 2021 30-day Breakdown Report for RCA IDs 08B46 and 08B47.

NEWBY ISLAND LANDFILL

TITLE V SEMI-ANNUAL MONITORING REPORT

Site: Newby Island Landfill	Facility ID#: A9013
Permitted Unit: S-2 WASTE DECOMPOSITION PROCESS WITH GAS COLLECTION SYSTEM, A-2 AND A-3 LANDFILL GAS FLARE; S-5 WASTE AND COVER MATERIAL DUMPING; S-6 EXCAVATING, BULLDOZING, AND COMPACTING ACTIVITIES	Reporting Period: from 08/01/2021 through 01/31/2022

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
						Intermittent	On August 30, 2021, a flame failure condition occurred at the A-2 and A-3 Flares, brought about by surging in the header, caused the GCCS to shut down. For additional information, including corrective actions taken, please refer to the September 9, 2021 30-day Breakdown Report for RCA IDs 08B51 and 08B52. On November 21, 2021, the BAAQMD inspector, Jay Patel, issued NOV A55726 for this event, denying breakdown relief.
						Intermittent	On September 4, 2021, auto block value failure due to compressor low air pressure caused the GCCS to shut down. For additional information, including corrective actions taken, please refer to the September 9, 2021 30-day Breakdown Report for RCA IDs 08B58 and 08B59. On November 21, 2021, the BAAQMD inspector, Jay Patel, issued NOV A55726 for this event, denying breakdown relief.

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Permitted Unit: S-2 WASTE DECOMPOSITION PROCESS WITH GAS COLLECTION SYSTEM, A-2 AND A-3 LANDFILL GAS FLARE; S-5 WASTE AND COVER MATERIAL DUMPING; S-6 EXCAVATING, BULLDOZING, AND COMPACTING ACTIVITIES	Reporting Period: from 08/01/2021 through 01/31/2022

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
						Intermittent	On September 17, 2021, a flame failure condition occurred at the A-2 and A-3 Flares, brought about by surging in the header, caused the GCCS to shut down. For additional information, including corrective actions taken, please refer to the September 27, 2021 30-day Breakdown Report for RCA IDs 08B82 and 08B83.
						Intermittent	On September 21, 2021, auto block value failure due to compressor malfunction caused the GCCS to shut down. For additional information, including corrective actions taken, please refer to the October 1, 2021 30-day Breakdown Report for RCA IDs 08B96 and 08B97. On November 21, 2021, the BAAQMD inspector, Jay Patel, issued NOV A55726 for this event, denying breakdown relief.
						Intermittent	On September 22, 2021, auto block value failure due to compressor malfunction caused the GCCS to shut down. For additional information, including corrective actions taken, please refer to the October 1, 2021 30-day Breakdown Report for RCA IDs 08C01 and 08C02.

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TITLE V SEMI-ANNUAL MONITORING REPORT

Site: Newby Island Landfill	Facility ID#: A9013
Permitted Unit: S-2 WASTE DECOMPOSITION PROCESS WITH GAS COLLECTION SYSTEM, A-2 AND A-3 LANDFILL GAS FLARE; S-5 WASTE AND COVER MATERIAL DUMPING; S-6 EXCAVATING, BULLDOZING, AND COMPACTING ACTIVITIES	Reporting Period: from 08/01/2021 through 01/31/2022

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
						Intermittent	On November 21, 2021, the BAAQMD inspector, Jay Patel, issued NOV A55726 for failure to operate the GCCS continuously during RCA events 08A51 and 08A52; 08B58 and 08B59; 08B96 and 08B97. For additional information, including corrective actions taken, please refer to the November 2, 2021 10-day Response Letter and the respective 30-day Breakdown Reports.
						Intermittent	On January 19, 2022, an unalarmed shutdown occurred during a troubleshooting event at the blowers. For additional information, including corrective actions taken, please refer to the January 27, 2022 30-day Breakdown Report for RCA IDs 08E92 and 08E93.

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TITLE V SEMI-ANNUAL MONITORING REPORT

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Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
Gas Flow	BAAQMD Condition # 10423, Parts 13f-h	Records of Landfill Gas Flow Rates, Collection and Control Systems Downtime, and Collection System Components	Periodic / Daily	BAAQMD Condition # 10423, Parts 5 and 6	Landfill gas collection system shall operate continuously and all collected gases shall be vented to a properly operating control system	Continuous	N/A
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
Periods of Inoperation for Parametric Monitors	BAAQMD 1-523.4	Operating Records for All Parametric Monitors	Periodic / Daily	BAAQMD 1-523.2	≤ 15 consecutive days per incident and ≤ 30 calendar days per 12-month period	Continuous	N/A

NEWBY ISLAND LANDFILL

TITLE V SEMI-ANNUAL MONITORING REPORT

Site: Newby Island Landfill	Facility ID#: A9013
Permitted Unit: S-2 WASTE DECOMPOSITION PROCESS WITH GAS COLLECTION SYSTEM, A-2 AND A-3 LANDFILL GAS FLARE; S-5 WASTE AND COVER MATERIAL DUMPING; S-6 EXCAVATING, BULLDOZING, AND COMPACTING ACTIVITIES	Reporting Period: from 08/01/2021 through 01/31/2022

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
Continuous Monitors	40 CFR 60.7(b)	Operating Records for All Continuous Monitors	Periodic / Daily	40 CFR 60.13(e)	Requires Continuous Operation except for breakdowns, repairs, calibration, and required span adjustments	Continuous	N/A
Wellhead Pressure	BAAQMD 8-34-414, 501.9 and 505.1	Monthly Inspection and Records	Periodic / Monthly	BAAQMD 8-34-305.1	< 0 psig (applies to all wells or collectors that are connected to the vacuum system)	Continuous	N/A
Temperature of Gas at Wellhead	BAAQMD 8-34-414, 501.9 and 505.2	Monthly Inspection and Records	Periodic / Monthly	BAAQMD 8-34-305.2	< 55 °C (< 131 °F), except for components identified in Condition # 818, Part 3b(i)	Continuous	N/A
Temperature of Gas at Wellheads	BAAQMD 8-34-414, 501.9, 505.2, and BAAQMD Condition 10423, part 6d(ii)	Monthly Inspection and Records	Periodic / Monthly	BAAQMD 8-34-305 and BAAQMD Condition 10423, part 6d(i)	<63 C (<145 F) (Alternative wellhead temperature limit that applies only to wells specified in BAAQMD Condition # 10423, Part 6d(i))	Continuous	N/A

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TITLE V SEMI-ANNUAL MONITORING REPORT

Site: Newby Island Landfill	Facility ID#: A9013
Permitted Unit: S-2 WASTE DECOMPOSITION PROCESS WITH GAS COLLECTION SYSTEM, A-2 AND A-3 LANDFILL GAS FLARE; S-5 WASTE AND COVER MATERIAL DUMPING; S-6 EXCAVATING, BULLDOZING, AND COMPACTING ACTIVITIES	Reporting Period: from 08/01/2021 through 01/31/2022

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
Gas Concentration at Wellhead	BAAQMD 8-34-414, 501.9 and 505.3 or 505.4	Monthly Inspection and Records	Periodic / Monthly	BAAQMD 8-34-305.3 or 305.4	N ₂ < 20% (by volume, dry basis) OR O ₂ < 5% (Applies to all wells or collectors that are connected to the vacuum system, except wells specified in BAAQMD Condition # 10423, Part 6c(i))	Continuous	N/A
Gas Concentrations at Header	BAAQMD 8-34-414, 501.9, and 505.3 or 505.4, and BAAQMD Condition 10423 part 6c(ii)	Monthly Inspection and Records	Periodic / Monthly	BAAQMD 8-34-305 and BAAQMD Condition # 10423, Part 6c(i)	O ₂ < 15% (Alternative wellhead oxygen concentration limit that applies only to wells specified in BAAQMD Condition # 10423, Part 6c(i))	Continuous	N/A
Well Shutdown Limits	BAAQMD 8-34-116.5 and 501.1	Records	Periodic / Daily	BAAQMD 8-34-116.2	No more than 5 wells at a time or 10% of total collection system, whichever is less	Continuous	N/A

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TITLE V SEMI-ANNUAL MONITORING REPORT

Site: Newby Island Landfill	Facility ID#: A9013
Permitted Unit: S-2 WASTE DECOMPOSITION PROCESS WITH GAS COLLECTION SYSTEM, A-2 AND A-3 LANDFILL GAS FLARE; S-5 WASTE AND COVER MATERIAL DUMPING; S-6 EXCAVATING, BULLDOZING, AND COMPACTING ACTIVITIES	Reporting Period: from 08/01/2021 through 01/31/2022

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
Well Shutdown Limits	BAAQMD 8-34-116.5 and 501.1	Records	Periodic / Daily	BAAQMD 8-34-116.3	< 24 hours per well	Continuous	N/A
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 8-34-117.6 and 501.1	Records	Periodic / Daily	BAAQMD 8-34-117.5	<24 hours per well or <5 days per well for component replacement	Continuous	On August 19, 2021, a Subsurface Oxidation (SSO) event was discovered. Following the discovery, site personnel immediately notified operations and maintenance (O&M) personnel and inspected the surrounding area for additional SSO indicators. Immediate actions to protect human and environmental health and safety were taken by O&M personnel, as isolation valves were closed and wells within a 250 and 500-foot radius were disconnected from vacuum to remediate the SSO. Procedures were followed per BAAQMD Regulation 8, Rule 34, Section 117 (8-34-117), except wells were taken offline greater than 24 hours without prior approval from the Air Pollution Control Officer (APCO).

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Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
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: < 1000 ppmv as methane	Continuous	N/A
TOC	BAAQMD 8-34-415, 416, 501.6, 506 and 510	Monthly Visual Inspection of Cover, Quarterly Inspection of Surface with portable analyzer, Various Reinspection Times for Leaking Areas, and Records	Periodic / Monthly, Quarterly, and on an Event Basis	BAAQMD 8-34-303	Surface Leak Limit: < 500 ppmv as methane at 2 inches above surface	Intermittent	During a BAAQMD inspection conducted on August 3, 2021, alleged surface leaks exceeding 500 ppmv were identified by BAAQMD staff. This resulted in the BAAQMD issuing NOV No. A55723 on August 4, 2021. For additional information, including corrective actions taken, please refer to the August 13, 2021 10-Day Deviation Letter and NOV Response Letter.

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Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
Non-Methane Organic Compounds (NMOC)	BAAQMD 8-34-412 and 8-34-501.4 and BAAQMD Condition # 10423, Part 11b	Annual Source Tests and Records	Periodic / Annual	BAAQMD 8-34-301.3	> 98% removal by weight OR < 30 ppmv, dry basis @ 3% O ₂ , expressed as methane (applies to flares only)	Continuous	N/A
Temperature of Combustion Zone (CT)	BAAQMD 8-34-501.3 and 507, SIP 8-34-501.3 and BAAQMD Condition # 10423, Parts 11	Temperature Sensor and Recorder (continuous)	Continuous	BAAQMD Condition # 10423, Part 9	CT > 1525 °F, averaged over any 3-hour period (applies to A-1/A-3 only) CT > 1400 °F, averaged over any 3-hour period (applies to A-2 only)	Continuous	N/A
Total Carbon	BAAQMD Condition # 10423, Part 3	Records	Periodic / Daily	BAAQMD 8-2-301	< 15 pounds/day or < 300 ppm, dry basis (applies only to aeration of or use as cover soil of soil containing < 50 ppmw of volatile organic compounds)	TBD	At the time of the submittal of this report, Newby has not finished compiling VOC soil records. SCS will submit a Title V semi-annual report amendment to confirm compliance once records are available for review.

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Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
Amount of Contaminated Soil Aerated or Used as Cover	BAAQMD Condition # 10423, Part 2m	Records	Periodic / On Event Basis	BAAQMD 8-40-116.1 and BAAQMD Condition # 10423, Parts 2 and 3	< 1 cubic yard per project	Continuous	N/A
Amount of Contaminated Soil Aerated or Used as Cover	BAAQMD 8-40-116.2 and BAAQMD Condition # 10423, Part 2m	Records	Periodic / On Event Basis	BAAQMD 8-40-116.2 and BAAQMD Condition #10423, Parts 2 and 3	< 8 cubic yards per project, provided organic content < 500 ppmw and limited to 1 exempt project per 3 month period	Continuous	N/A
Amount of Contaminated Soil Aerated or Used as Cover	BAAQMD Condition # 10423, Part 2m	Records	Periodic / On Event Basis	BAAQMD 8-40-301 and BAAQMD Condition #10423, Parts 2 and 3	Prohibited for Soil with Organic Content >50 ppmw unless exempt per BAAQMD 8-40-116, 117, or 118	Continuous	N/A

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Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
Amount of Accidental Spillage	None	N/A	None	BAAQMD 8-40-117 and BAAQMD Condition # 10423, Parts 2 and 3	Soil Contaminated by Accidental Spillage of < 5 Gallons of Liquid Organic Compounds	Continuous	N/A
Total Aeration Project Emissions	BAAQMD Condition #10423, Part 2m	Records	Periodic / On Event Basis	BAAQMD 8-40-118 and BAAQMD Condition # 10423, Parts 2 and 3	< 150 pounds VOC per project and toxic air contaminant emissions per year < BAAQMD Table 2-1-316 limits	Continuous	N/A
Opacity	BAAQMD Condition # 10423, Part 13e	Records of all site watering and road cleaning events	Periodic / On event basis, Monthly	BAAQMD 6-1-301 and SIP 6-301	Ringelmann No. 1 for ≤ 3 minutes/hr (applies to S-1)	Continuous	N/A

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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 6-1-301 and SIP 6-301	Ringelmann No. 1 for < 3 minutes/hr (applies to flares)	Continuous	N/A
TSP	None	N/A	None	BAAQMD 6-1-310.1 and SIP 6-310	< 0.15 grains/dscf (applies to flares only)	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 min. and <0.05 ppm for 24 hours (applies to flares only)	Continuous	N/A
SO ₂	BAAQMD Condition # 10423, Parts 10 and 13j	Sulfur analysis of landfill gas and Records	Periodic / Quarterly	BAAQMD Regulation 9-1-302	Exhaust Gas from Flare: < 300 ppm (dry basis) (applies to flares only)	Continuous	N/A

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Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
Total Sulfur Content in Landfill Gas	BAAQMD Condition # 10423, Parts 10a and 13j	Sulfur analysis of landfill gas	Periodic / Quarterly	BAAQMD Condition # 10423, Part 10a	< 1300 ppmv instantaneous concentration (expressed as H ₂ S)	Continuous	N/A
Total Sulfur Content in Landfill Gas	BAAQMD Condition # 10423, Parts 10a and 13j	Sulfur analysis of landfill gas and Records	Periodic / Quarterly	BAAQMD Condition # 10423, Part 10a	< 300 ppmv annual average (expressed as H ₂ S)	Continuous	N/A
NO _x	BAAQMD Condition 10423, Part 11d	Annual Source Test & Records	Periodic / Annual	BAAQMD Condition # 10423, Part 10b	Applies to Exhaust Gas from Flares: < 60 ppm corrected to 15% oxygen, dry basis (< 0.05 pounds NO _x per million BTU LFG)	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 minutes and < 0.03 ppm, averaged over 60 minutes	Continuous	N/A

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Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
Amount of Waste Accepted	BAAQMD Condition # 10423, Part 13a	Records	Periodic / Daily	BAAQMD Condition # 10423, Part 1	4,000 tons/day and < 39,000,000 tons (predicted cumulative amount of all wastes) and < 50,800,000 yd3 (cumulative amount of all wastes and cover materials)	Continuous	N/A
Heat Input A-1/A-3	BAAQMD Condition # 10423, Parts 8 and 13h	Records	Periodic / Daily	BAAQMD Condition # 10423, Part 8	< 2,006 MM BTU per day and < 732,095 MM BTU per year	Continuous	N/A
Heat Input, A-2	BAAQMD Condition # 10423, Parts 8 and 13h	Records	Periodic / Daily	BAAQMD Condition # 10423, Part 8	< 1,800 MM BTU per day and < 657,000 MM BTU per year	Continuous	N/A

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TITLE V SEMI-ANNUAL MONITORING REPORT

Site: Newby Island Landfill	Facility ID#: A9013
Permitted Unit: S-3 COMPOSTING OPERATION; A-3 WATER TRUCK	Reporting Period: <i>from</i> 08/01/2021 <i>through</i> 01/31/2022

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
Opacity	BAAQMD Condition # 8178, Parts 3 and 4	Observation of Operations and Records	Periodic / On Event Basis	BAAQMD Regulation 6-1-301 and SIP 6-301	< Ringelmann 1.0 for 3 minutes in any hour	Continuous	N/A
Opacity	BAAQMD Condition # 8178, Parts 3 and 4	Observation of Operations and Records	Periodic / On Event Basis	BAAQMD Condition # 8178, Part 3	< Ringelmann 1.0	Continuous	N/A

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TITLE V SEMI-ANNUAL MONITORING REPORT

Site: Newby Island Landfill	Facility ID#: A9013
Permitted Unit: S-4 NON-RETAIL GASOLINE DISPENSING FACILITY	Reporting Period: from 08/01/2021 through 01/31/2022

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
Gasoline Throughput	BAAQMD 8-7-503.1	Records	Periodic / Annual	BAAQMD Condition # 14098	940,000 gallons per 12-month period	Continuous	N/A
Throughput (exempt from Phase I)	BAAQMD 8-7-501 and 8-7-503.2	Records	Periodic / On event basis	BAAQMD 8-7-114	1000 gallons per facility for tank integrity leak checking	Continuous	N/A
Organic Compounds	None	N/A	None	SIP 8-5-303.2	Tank Pressure Vacuum Valve Shall Be: Gas Tight or < 500 ppmv (expressed as methane) above background for PRVs (as defined in SIP 8-5-206)	Continuous	N/A
Organic Compounds	None	Equipment must be precertified by CARB	None	BAAQMD 8-7-301.2	All Phase I Systems Shall Meet the Emission Limitations of the Applicable CARB Certification	Continuous	N/A
Organic Compounds	CARB EO G-70-148-A paragraph 21	Annual Check for Vapor Tightness and Proper Operation of Vapor Recovery	Periodic / Annual	BAAQMD 8-7-301.6	All Phase I Equipment (except components with allowable leak rates) shall be leak free (<3 drops/minute) and vapor tight	Continuous	N/A

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Site: Newby Island Landfill	Facility ID#: A9013
Permitted Unit: S-4 NON-RETAIL GASOLINE DISPENSING FACILITY	Reporting Period: from 08/01/2021 through 01/31/2022

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
		System					
Organic Compounds	CARB EO G-70-148-A paragraph 21	Annual Check for Vapor Tightness and Proper Operation of Vapor Recovery System	Periodic / Annual	BAAQMD 8-7-302.5	All Phase II Equipment (except components with allowable leak rates or at the nozzle/fill-pipe interface) Shall Be: leak free (<3 drops/minute) and vapor tight	Continuous	N/A
Organic Compounds	CARB EO G-70-148-A paragraph 21	Annual Check for Vapor Tightness and Proper Operation of Vapor Recovery System	Periodic / Annual	CARB EO G-70-148-A paragraph 10	Any Emergency Vent or Manway Shall Be: leak free	Continuous	N/A
Defective Component Repair/ Replacement Time Limit	BAAQMD 8-7-503.2	Records	Periodic / On Event Basis	BAAQMD 8-7-302.4	< 7 days	Continuous	N/A
Liquid Removal Rate	CARB EO G-70-52-AM	CARB Certification Procedures	Periodic / On Event Basis	BAAQMD 8-7-302.8	> 5 ml per gallon dispensed, when dispensing rate	Continuous	N/A

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Site: Newby Island Landfill	Facility ID#: A9013
Permitted Unit: S-4 NON-RETAIL GASOLINE DISPENSING FACILITY	Reporting Period: from 08/01/2021 through 01/31/2022

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
					> 5 gallons/minute		
Liquid Retain from Nozzles	CARB EO G-70-52-AM	CARB Certification Procedures	Periodic / On Event Basis	BAAQMD 8-7-302.12	< 100 ml per 1000 gallons dispensed	Continuous	N/A
Nozzle Spitting	CARB EO G-70-52-AM	CARB Certification Procedures	Periodic / On Event Basis	BAAQMD 8-7-302.13	< 1.0 ml per nozzle per test	Continuous	N/A
Pressure-Vacuum Valve Settings	CARB EO G-70-148-A	CARB Certification Procedures	Periodic / On Event Basis	BAAQMD 8-7-316 and CARB EO G-70-148-A, paragraph 14	Pressure Setting: > 2.5 inches of water, gauge	Continuous	N/A
Pressure-Vacuum Valve Settings	None	N/A	None	SIP 8-5-303.1	Pressure Setting: > 10% of maximum working pressure or > 0.5 psig	Continuous	N/A
Disconnection Liquid Leaks	CARB EO G-70-148-A paragraph 21	Annual Check for Vapor Tightness and Proper Operation of Vapor Recovery System	Periodic / Annual	CARB EO G-70-148-A paragraph 12	10 ml per disconnect, averaged over 3 disconnect operations	Continuous	N/A

NEWBY ISLAND LANDFILL

TITLE V SEMI-ANNUAL MONITORING REPORT

Site: Newby Island Landfill	Facility ID#: A9013
Permitted Unit: S-8 HORIZONTAL GRINDER OPERATIONS/ S-9 TROMMEL SCREEN/OPERATIONS	Reporting Period: from 08/01/2021 through 01/31/2022

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 6-1-301 and SIP 6-301	Ringelmann 1.0 for <3 minutes in any hour	Continuous	N/A
Particulate Matter (PM)	None	N/A	None	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

Appendix F – Title V Annual Compliance Certification

NEWBY ISLAND LANDFILL

TITLE V ANNUAL CERTIFICATION

SITE: NEWBY ISLAND LANDFILL	FACILITY ID#: A9013
REPORTING PERIOD: <i>from</i> 02/01/2021 <i>through</i> 01/31/2022	

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:



02/22/2022

Signature of Responsible Official

Date

Daniel North

Name of Responsible Official (please print)

General Manager

Title of Responsible Official (please print)

Mail to:

*Director of Compliance and Enforcement
BAAQMD
375 Beale Street, Suite 600
San Francisco, CA 94105
Attn: Title V reports*

Newby also maintains a Title V Permit (Facility No. A9013), which expired on December 20, 2017. On June 20, 2017, a Title V Renewal Application was submitted to the Bay Area Air Quality Management District (BAAQMD). The site currently operates under an application shield. On November 30, 2021, Mr. Dennis Jang with the BAAQMD informed IDCC that the renewal application (Application Number [A/N] 28723) is open and in process and another renewal application will not be needed.

The conditions listed below are incorporated in the BAAQMD Permit to Operate (PTO) that expires August 1, 2022, but has not yet been incorporated into the Title V permit. All conditions have been reviewed for compliance, and the site is in compliance.

- Condition #24887 – applies to S#4
- Condition #26046 – applies to S#7, 8, 9, 10
- Condition #26606 – applies to S#1008
- Condition #26607 – applies to S#1040
- Condition #26608 – applies to S#1009
- Condition #26609 – applies to S#1042
- Condition #26610 – applies to S#1043
- Condition #26611 – applies to S#1038
- Condition #27359 – applies to S#153

Records to confirm if S-1042 was operated in one on-site location for less than 12 consecutive months was not available at the time of the submittal and will be confirmed in the following submittals (Condition 26609 Part 1).

On July 21, 2021, Newby received the following permit conditions for S-1055, 1056, and 1057.

- Condition #27446 – applies S#1057
- Condition #27477 – applies to S#1055, 1056

Please note that IDCC does not own the engines for S-1055, 1056, and 1057. As such, IDCC is inquiring with the owners, United Rentals, how to comply with the following permit conditions as the site does not have full autonomy on the equipment. IDCC followed up with the BAAQMD for recommendations on how to comply with these conditions under these circumstances. At this time, no recommendation has been provided by the BAAQMD.

- Condition 27446 Part 10
- Condition 27447 Part 2 and 3

Newby also maintains an Authority to Construct (ATC) Application Number (A/N) 28472 for the S-1003 Covered Aerated Static Pile (CASP) Composting Operation and the S-15 Mixed Waste Stockpiles. The ATCs for the S-1003 CASP Composting Operation and S-15 Mixed Waste Stockpiles were issued on November 21, 2017, were extended via approval email from the BAAQMD on November 21, 2019, and expired on November 21, 2021. On September 21, 2021, IDCC submitted a request to extend the ATC. On October 18, 2021, the BAAQMD informed IDCC that the ATC will not be cancelled. All conditions have been reviewed for compliance and there were two deviations of the ATC this reporting period.

- On May 27, 2021, Notice of Violation (NOV) Number A55721 was issued by BAAQMD Inspector, Mr. Jay Patel, to Newby Island for an alleged violation of CASP ATC Condition No. 26632, Part 9. Per the NOV, IDCC allegedly failed to comply with CASP ATC Condition No. 26632 Part 9 requirements to immediately initiate corrective actions and maintain records for temperatures that exceeded 180 degrees Fahrenheit (°F) for over six consecutive hours. The NOV was based on records from September 2019 through December 2020. For additional information, including corrective actions taken, please refer to the June 4, 2021 10-day Response Letter.
- On August 17, 2021, NOV Number A55724 was issued by BAAQMD Inspector, Mr. Jay Patel, to Newby Island for an alleged violation of BAAQMD Regulation 1, Section 301 (Public Nuisance) for alleged odor complaints that were reported on July 19, 2021. For additional information, including corrective actions taken, please refer to the August 27, 2021 10-day Response Letter.

Compliance Certification Report

Site #: A9013

Address: 1601 Dixon Landing Road

Source #: Facility

Site Name: Newby Island Landfill

City: Milpitas, CA

Source Name: Facility

Reporting Period: 02/1/2021 to 01/31/2022

Zip Code: 95035

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Continuous or Intermittent	Notes
BAAQMD Regulation 1	General Provisions and Definitions (5/4/11)	N	C	
SIP Regulation 1	General Provisions and Definitions (6/28/99)	Y	C	
BAAQMD Regulation 2, Rule 1	Permits – General Requirements (4/18/12)	N	C	
BAAQMD 2-1-429	Permits – General Requirements: Federal Emissions Statement (12/21/04)	N	C	
SIP Regulation 2, Rule 1	Permits - General Requirements (1/26/99)	Y	C	
SIP Regulation 2-1-429	Permits – General Requirements: Federal Emissions Statement (4/3/95)	Y	C	
BAAQMD Regulation 2, Rule 5	Permits – New Source Review of Toxic Air Contaminants (1/6/10)	N	C	
BAAQMD Regulation 5	Open Burning (7/9/08)	N	C	
SIP Regulation 5	Open Burning (9/4/98)	Y	C	
BAAQMD Regulation 6, Rule 1	Particulate Matter – General Requirements (12/5/07)	N	C	
SIP Regulation 6	Particulate Matter and Visible Emissions (9/4/98)	Y	C	
BAAQMD Regulation 7	Odororous Substances (3/17/82)	N	C	
BAAQMD Regulation 8, Rule 1	Organic Compounds - General Provisions (6/15/94)	Y	C	
BAAQMD Regulation 8, Rule 2	Organic Compounds – Miscellaneous Operations (7/20/05)	N	C	
SIP Regulation 8, Rule 2	Organic Compounds – Miscellaneous Operations (3/22/95)	Y	C	
BAAQMD Regulation 8, Rule 3	Organic Compounds - Architectural Coatings (7/1/09)	N	C	
SIP Regulation 8, Rule 3	Organic Compounds - Architectural Coatings (1/2/04)	Y	C	
BAAQMD Regulation 8, Rule 4	Organic Compounds - General Solvent and Surface Coating Operations (10/16/02)	Y	C	
BAAQMD Regulation 8, Rule 15	Organic Compounds – Emulsified and Liquid Asphalts (6/1/94)	Y	C	
BAAQMD Regulation 8, Rule 16	Organic Compounds - Solvent Cleaning Operations (10/16/02)	Y	C	
BAAQMD Regulation 8, Rule 40	Organic Compounds – Aeration of Contaminated Soil and Removal of Underground Storage Tanks (6/15/05)	N	C	
SIP Regulation 8, Rule 40	Organic Compounds – Aeration of Contaminated Soil and Removal of Underground Storage Tanks (4/19/01)	Y	C	
BAAQMD Regulation 8, Rule 47	Organic Compounds – Air Stripping and Soil Vapor Extraction Operations (6/15/05)	N	C	

Compliance Certification Report

Site #: A9013

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City: Milpitas, CA

Source Name: Facility

Reporting Period: 02/1/2021 to 01/31/2022

Zip Code: 95035

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Continuous or Intermittent	Notes
SIP Regulation 8, Rule 47	Organic Compounds – Air Stripping and Soil Vapor Extraction Operations (4/26/95)	Y	C	
BAAQMD Regulation 8, Rule 49	Organic Compounds - Aerosol Paint Products (12/20/95)	N	C	
SIP Regulation 8, Rule 49	Organic Compounds - Aerosol Paint Products (3/22/95)	Y	C	
BAAQMD Regulation 8, Rule 51	Organic Compounds - Adhesive and Sealant Products (7/17/02)	N	C	
SIP Regulation 8, Rule 51	Organic Compounds - Adhesive and Sealant Products (2/26/02)	Y	C	
BAAQMD Regulation 9, Rule 1	Inorganic Gaseous Pollutants – Sulfur Dioxide (3/15/95)	N	C	
SIP Regulation 9, Rule 1	Inorganic Gaseous Pollutants – Sulfur Dioxide (6/8/99)	Y	C	
BAAQMD Regulation 9, Rule 2	Inorganic Gaseous Pollutants – Hydrogen Sulfide (10/6/99)	N	C	
BAAQMD Regulation 11, Rule 1	Hazardous Pollutants – Lead (3/17/82)	N	C	
SIP Regulation 11, Rule 1	Hazardous Pollutants – Lead (9/2/81)	Y	C	
BAAQMD Regulation 11, Rule 2	Hazardous Pollutants - Asbestos Demolition, Renovation and Manufacturing (10/7/98)	N	C	
BAAQMD Regulation 11, Rule 14	Hazardous Pollutants - Asbestos Containing Serpentine (7/17/91)	N	C	
BAAQMD Regulation 12, Rule 4	Miscellaneous Standards of Performance - Sandblasting (7/11/90)	N	C	
SIP Regulation 12, Rule 4	Miscellaneous Standards of Performance - Sandblasting (9/2/81)	Y	C	
California Health and Safety Code Section 41750 et seq.	Portable Equipment	N	C	
California Health and Safety Code Section 44300 et seq.	Air Toxics “Hot Spots” Information and Assessment Act of 1987	N	C	
California Health and Safety Code Title 17, 93105	Asbestos Airborne Toxic Control Measure for Construction, Grading, Quarrying and Surface Mining Operations (7/26/01)	N	C	
California Health and Safety Code Title 17, 93106	Asbestos Airborne Toxic Control Measure for Asbestos Containing Serpentine (7/20/00)	N	C	
California Health and Safety Code Title 17, 93116	Airborne Toxic Control Measure for Diesel Particulate Matter from Portable Engines Rated at 50 Horsepower and Greater (2/19/11)	N	C	
40 CFR Part 61, Subpart A	National Emission Standards for Hazardous Air Pollutants – General Provisions (9/13/10)	Y	C	

Compliance Certification Report

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Source #: Facility

Site Name: Newby Island Landfill

City: Milpitas, CA

Source Name: Facility

Reporting Period: 02/1/2021 to 01/31/2022

Zip Code: 95035

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Continuous or Intermittent	Notes
40 CFR Part 61, Subpart M	National Emission Standards for Hazardous Air Pollutants – National Emission Standard for Asbestos (7/20/04)	Y	C	

Compliance Certification Report

Site #: A9013

Address: 1601 Dixon Landing Road

Source #: S-2, S-5, S-6

Site Name: Newby Island Landfill

City: Milpitas, CA

Source Name: MSW Landfill - Waste Decomposition Process Equipped with LFG Collection System (S-2), abated Flares (A-2 and A-3), Waste and Cover Material Dumping (S-5), Excavating, Bulldozing, and Compacting Activities (S-6)

Reporting Period: 02/1/2021 to 01/31/2022

Zip Code: 95035

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Continuous or Intermittent	Comments
BAAQMD Regulation 1	General Provisions and Definitions (5/4/11)			
1-523	Parametric Monitoring and Recordkeeping Procedures	N	C	
1-523.1	Parametric monitor periods of inoperation	Y	C	
1-523.2	Limit on duration of inoperation	Y	C	
1-523.3	Reporting requirement for violations of any applicable limits	N	C	
1-523.4	Records of inoperation, tests, calibrations, adjustments, & maintenance	Y	C	
1-523.5	Maintenance and calibration	N	C	
SIP Regulation 1	General Provisions and Definitions (6/28/99)			
1-523	Parametric Monitoring and Recordkeeping Procedures	Y	C	
1-523.3	Reports of Violations	Y	C	
1-523.5	Maintenance and calibration	Y	C	
BAAQMD Regulation 6, Rule 1	Particulate Matter – General Requirements (12/5/07)			
6-1-301	Ringelmann No. 1 Limitation	N	C	
6-1-305	Visible Particles	N	C	
6-1-310	Particle Weight Limitation (applies to Flares only)	N	C	
6-1-401	Appearance of Emissions	N	C	
SIP Regulation 6	Particulate Matter and Visible Emissions (9/4/98)			
6-301	Ringelmann No. 1 Limitation	Y	C	
6-305	Visible Particles	Y	C	
6-310	Particle Weight Limitation (applies to flare only)	Y	C	
6-401	Appearance of Emissions	Y	C	

Compliance Certification Report

Site #: A9013

Address: 1601 Dixon Landing Road

Source #: S-2, S-5, S-6

Site Name: Newby Island Landfill

City: Milpitas, CA

Source Name: MSW Landfill - Waste Decomposition Process Equipped with LFG Collection System (S-2), abated Flares (A-2 and A-3), Waste and Cover Material Dumping (S-5), Excavating, Bulldozing, and Compacting Activities (S-6)

Reporting Period: 02/1/2021 to 01/31/2022

Zip Code: 95035

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Continuous or Intermittent	Comments
BAAQMD Regulation 8, Rule 2	Organic Compounds – Miscellaneous Operations (7/20/05)			
8-2-301	Miscellaneous Operations (applies to VOC-laden soil handling and disposal activities only)	Y	C	
BAAQMD Regulation 8, Rule 34	Organic Compounds – Solid Waste Disposal Sites (6/15/05)			
8-34-113	Limited Exemption, Inspection and Maintenance	Y	C	
8-34-113.1	Emission Minimization Requirement	Y	C	
8-34-113.2	Shutdown Time Limitation	Y	C	
8-34-113.3	Recordkeeping Requirement	Y	C	
8-34-116	Limited Exemption, Well Raising	Y	C	
8-34-116.1	New Fill	Y	C	
8-34-116.2	Limits on Number of Wells Shutdown	Y	C	
8-34-116.3	Shutdown Duration Limit	Y	C	
8-34-116.4	Capping Well Extensions	Y	C	
8-34-116.5	Well Disconnection Records	Y	C	
8-34-117	Limited Exemption, Gas Collection System Components	Y	C	
8-34-117.1	Necessity of Existing Component Repairs/Adjustments	Y	C	
8-34-117.2	New Components are Described in Collection and Control System Design Plan	Y	C	
8-34-117.3	Meets Section 8-34-118 Requirements	Y	C	
8-34-117.4	Limits on Number of Wells Shutdown	Y	C	

Compliance Certification Report

Site #: A9013

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Source #: S-2, S-5, S-6

Site Name: Newby Island Landfill

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Source Name: MSW Landfill - Waste Decomposition Process Equipped with LFG Collection System (S-2), abated Flares (A-2 and A-3), Waste and Cover Material Dumping (S-5), Excavating, Bulldozing, and Compacting Activities (S-6)

Reporting Period: 02/1/2021 to 01/31/2022

Zip Code: 95035

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Continuous or Intermittent	Comments
8-34-117.5	Shutdown Duration Limit	Y	I	A subsurface oxidation (SSO) event was discovered at Newby Island on April 14, 2021. Wells within a 300-foot and 500-foot radius were disconnected from vacuum. No wells were disconnected from vacuum greater than five consecutive days to prevent further air intrusion into the waste mass at Newby Island during the SSO event. Refer to April 23, 2021 30-Day Deviation Report for additional information, including corrective actions taken.
			I	On August 19, 2021, a SSO event was discovered at Newby Island. Following the discovery, site personnel immediately notified operations and maintenance (O&M) personnel and inspected the surrounding area for additional SSO indicators. Immediate actions to protect human and environmental health and safety were taken by O&M personnel, as isolation valves were closed and wells within a 250 and 500-foot radius were disconnected from vacuum to remediate the SSO. Procedures were followed per BAAQMD Regulation 8, Rule 34, Section 117 (8-34-117), except wells were taken offline greater than 24 hours without prior approval from the Air Pollution Control Officer (APCO).
8-34-117.6	Well Disconnection Records	Y	C	
8-34-118	Limited Exemption, Construction Activities	Y	C	

Compliance Certification Report

Site #: A9013

Address: 1601 Dixon Landing Road

Source #: S-2, S-5, S-6

Site Name: Newby Island Landfill

City: Milpitas, CA

Source Name: MSW Landfill - Waste Decomposition Process Equipped with LFG Collection System (S-2), abated Flares (A-2 and A-3), Waste and Cover Material Dumping (S-5), Excavating, Bulldozing, and Compacting Activities (S-6)

Reporting Period: 02/1/2021 to 01/31/2022

Zip Code: 95035

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Continuous or Intermittent	Comments
8-34-118.1	Construction Plan	Y	C	
8-34-118.2	Activity is Required to Maintain Compliance with this Rule	Y	C	
8-34-118.3	Required or Approved by Other Enforcement Agencies	Y	C	
8-34-118.4	Emission Minimization Requirement	Y	C	
8-34-118.5	Excavated Refuse Requirements	Y	C	
8-34-118.6	Covering Requirements for Exposed Refuse	Y	C	
8-34-118.7	Installation Time Limit	Y	C	
8-34-118.8	Capping Required for New Components	Y	C	
8-34-118.9	Construction Activity Records	Y	C	
8-34-301	Landfill Gas Collection and Emission Control System Requirements	Y	C	
8-34-301.1	Continuous Operation	Y	I	On March 10 and 12, 2021, a utility outage occurred at the site causing the A-2 and A-3 Flares to automatically shut down. For additional information, including corrective actions taken, please refer to the March 20, 2021 30-day Breakdown Report for Reportable Compliance Activity (RCA) IDs 07Y71 and 07Y72 and 07Y73 and 07Y74. On June 14, 2021, the BAAQMD inspector, Jay Patel, issued NOV A55722 for failure to operate the GCCS continuously, denying breakdown relief.
			I	On March 27 and 28, 2021, air blower flow alarms occurred at the site causing the A-2 and A-3 Flares to automatically shut down. For additional information, including corrective actions taken, please refer to the April 6, 2021 30-day Breakdown Report for RCA IDs 07Y89 and 07Y90 and 07Y92 and 07Y93. On June 14, 2021, the BAAQMD inspector, Jay Patel, issued NOV A55722 for failure to operate the GCCS continuously, denying breakdown relief.

Compliance Certification Report

Site #: A9013

Address: 1601 Dixon Landing Road

Source #: S-2, S-5, S-6

Site Name: Newby Island Landfill

City: Milpitas, CA

Source Name: MSW Landfill - Waste Decomposition Process Equipped with LFG Collection System (S-2), abated Flares (A-2 and A-3), Waste and Cover Material Dumping (S-5), Excavating, Bulldozing, and Compacting Activities (S-6)

Reporting Period: 02/1/2021 to 01/31/2022

Zip Code: 95035

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Continuous or Intermittent	Comments
			I	On May 5, 2021, air blower flow alarms occurred at the site causing the A-2 and A-3 Flares to automatically shut down. For additional information, including corrective actions taken, please refer to the May 13, 2021 30-day Breakdown Report for RCA IDs 07Z38 and 07Z39. On June 14, 2021, the BAAQMD inspector, Jay Patel, issued NOV A55722 for failure to operate the GCCS continuously, denying breakdown relief.
			I	On May 30, 2021, air blower flow alarms occurred at the site causing the A-2 and A-3 Flares to automatically shut down. For additional information, including corrective actions taken, please refer to the June 9, 2021 30-day Breakdown Report for RCA IDs 07Z82 and 07Z86. On June 14, 2021, the BAAQMD inspector, Jay Patel, issued NOV A55722 for failure to operate the GCCS continuously, denying breakdown relief.
			I	On May 31, 2021, air blower flow alarms occurred at the site causing the A-2 and A-3 Flares to automatically shut down. For additional information, including corrective actions taken, please refer to the June 9, 2021 30-day Breakdown Report for RCA IDs 07Z83 and 07Z87; 07Z84 and 07Z88; 07Z85 and 07Z89. On June 14, 2021, the BAAQMD inspector, Jay Patel, issued NOV A55722 for failure to operate the GCCS continuously, denying breakdown relief.

Compliance Certification Report

Site #: A9013

Address: 1601 Dixon Landing Road

Source #: S-2, S-5, S-6

Site Name: Newby Island Landfill

City: Milpitas, CA

Source Name: MSW Landfill - Waste Decomposition Process Equipped with LFG Collection System (S-2), abated Flares (A-2 and A-3), Waste and Cover Material Dumping (S-5), Excavating, Bulldozing, and Compacting Activities (S-6)

Reporting Period: 02/1/2021 to 01/31/2022

Zip Code: 95035

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Continuous or Intermittent	Comments
			I	On June 14, 2021, the BAAQMD inspector, Jay Patel, issued NOV A55722 for failure to operate the GCCS continuously during RCA events 07Y73 and 07Y74; 07Y89 and 07Y90; 07Y92 and 07Y93; 07Z38 and 07Z39; 07Z82 and 07Z86; 07Z83 and 07Z87; 07Z84 and 07Z88; 07Z85 and 07Z89. For additional information, including corrective actions taken, please refer to the June 24, 2021 10-day Response Letter and the respective 30-day Breakdown Reports.
			I	On July 10, 2021, the power supply at the site was tripped, causing the GCCS to shut down. For additional information, including corrective actions taken, please refer to the July 20, 2021 30-day Breakdown Report for RCA IDs 08A51 and 08A52. On October 21, 2021, the BAAQMD inspector, Jay Patel, issued NOV A55726 for failure to operate the GCCS continuously, denying breakdown relief.
			I	On July 15, 2021, low flow alarms were triggered during planned maintenance on Condensate Sump 18. For additional information, including corrective actions taken, please refer to the July 23, 2021 30-day Breakdown Report for RCA IDs 08A58 and 08A59. On October 21, 2021, the BAAQMD inspector, Jay Patel, issued NOV A55726 for failure to operate the GCCS continuously, denying breakdown relief.

Compliance Certification Report

Site #: A9013

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Source #: S-2, S-5, S-6

Site Name: Newby Island Landfill

City: Milpitas, CA

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Reporting Period: 02/1/2021 to 01/31/2022

Zip Code: 95035

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Continuous or Intermittent	Comments
			I	On July 22, 2021, a flame failure condition occurred at the A-2 and A-3 Flares, brought about by surging in the header, leading to an automatic shutdown of GCCS. For additional information, including corrective actions taken, please refer to the July 30, 2021 30-day Breakdown Report for RCA IDs 08A73 and 08A74.
			I	On August 17, 2021, high gas flow caused the A-2 and A-3 Flares to automatically shut down. For additional information, including corrective actions taken, please refer to the August 27, 2021 30-day Breakdown Report for RCA IDs 08B36 and 08B37; 08B38 and 08B39.
			I	On August 23, 2021, a flame failure condition occurred at the A-2 and A-3 Flares, brought about by surging in the header, caused the GCCS to shut down. For additional information, including corrective actions taken, please refer to the September 2, 2021 30-day Breakdown Report for RCA IDs 08B44 and 08B45.
			I	On August 24, 2021, a flame failure condition occurred at the A-2 and A-3 Flares, brought about by surging in the header, caused the GCCS to shut down. For additional information, including corrective actions taken, please refer to the September 2, 2021 30-day Breakdown Report for RCA IDs 08B46 and 08B47.

Compliance Certification Report

Site #: A9013

Address: 1601 Dixon Landing Road

Source #: S-2, S-5, S-6

Site Name: Newby Island Landfill

City: Milpitas, CA

Source Name: MSW Landfill - Waste Decomposition Process Equipped with LFG Collection System (S-2), abated Flares (A-2 and A-3), Waste and Cover Material Dumping (S-5), Excavating, Bulldozing, and Compacting Activities (S-6)

Reporting Period: 02/1/2021 to 01/31/2022

Zip Code: 95035

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Continuous or Intermittent	Comments
			I	On August 30, 2021, a flame failure condition occurred at the A-2 and A-3 Flares, brought about by surging in the header, caused the GCCS to shut down. For additional information, including corrective actions taken, please refer to the September 9, 2021 30-day Breakdown Report for RCA IDs 08B51 and 08B52.
			I	On September 4, 2021, auto block value failure due to compressor low air pressure caused the GCCS to shut down. For additional information, including corrective actions taken, please refer to the September 9, 2021 30-day Breakdown Report for RCA IDs 08B58 and 08B59.
			I	On September 17, 2021, a flame failure condition occurred at the A-2 and A-3 Flares, brought about by surging in the header, caused the GCCS to shut down. For additional information, including corrective actions taken, please refer to the September 27, 2021 30-day Breakdown Report for RCA IDs 08B82 and 08B83.
			I	On September 21, 2021, auto block value failure due to compressor malfunction caused the GCCS to shut down. For additional information, including corrective actions taken, please refer to the October 1, 2021 30-day Breakdown Report for RCA IDs 08B96 and 08B97. On October 21, 2021, the BAAQMD inspector, Jay Patel, issued NOV A55726 for failure to operate the GCCS continuously, denying breakdown relief.

Compliance Certification Report

Site #: A9013

Address: 1601 Dixon Landing Road

Source #: S-2, S-5, S-6

Site Name: Newby Island Landfill

City: Milpitas, CA

Source Name: MSW Landfill - Waste Decomposition Process Equipped with LFG Collection System (S-2), abated Flares (A-2 and A-3), Waste and Cover Material Dumping (S-5), Excavating, Bulldozing, and Compacting Activities (S-6)

Reporting Period: 02/1/2021 to 01/31/2022

Zip Code: 95035

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Continuous or Intermittent	Comments
			I	On September 22, 2021, auto block value failure due to compressor malfunction caused the GCCS to shut down. For additional information, including corrective actions taken, please refer to the October 1, 2021 30-day Breakdown Report for RCA IDs 08C01 and 08C02.
			I	On October 21, 2021, the BAAQMD inspector, Jay Patel, issued NOV A55726 for failure to operate the GCCS continuously during RCA events 08A51 and 08A52; 08B58 and 08B59; 08B96 and 08B97. For additional information, including corrective actions taken, please refer to the November 2, 2021 10-day Response Letter and the respective 30-day Breakdown Reports.
			I	On January 19, 2022, an unalarmed shutdown occurred during a troubleshooting event at the blowers. For additional information, including corrective actions taken, please refer to the January 27, 2022 30-day Breakdown Report for RCA IDs 08E92 and 08E93.
8-34-301.2	Collection and Control Systems Leak Limitations	Y	C	
8-34-301.3	Limits for Enclosed Flares (applies to A-2 & A-3 only)	Y	C	
8-34-301.4	Limits for Other Emission Control Systems (Permit Holder shall ensure that Facility # B1670 will comply with this requirement whenever landfill gas is vented to the IC Engines: S-2, S-3, S-4, S-5, S-8, S-9, S11; at Facility # B1670)			

Compliance Certification Report

Site #: A9013

Address: 1601 Dixon Landing Road

Source #: S-2, S-5, S-6

Site Name: Newby Island Landfill

City: Milpitas, CA

Source Name: MSW Landfill - Waste Decomposition Process Equipped with LFG Collection System (S-2), abated Flares (A-2 and A-3), Waste and Cover Material Dumping (S-5), Excavating, Bulldozing, and Compacting Activities (S-6)

Reporting Period: 02/1/2021 to 01/31/2022

Zip Code: 95035

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Continuous or Intermittent	Comments
8-34-303	Landfill Surface Requirements	Y	I	During a District inspection conducted on August 3, 2021, alleged surface leaks exceeding 500 ppmv were identified by BAAQMD staff. This resulted in the BAAQMD issuing NOV No. A55723 on August 4, 2021. For additional information, including corrective actions taken, please refer to the August 13, 2021 10-Day Deviation Letter and NOV Response Letter.
8-34-304	Gas Collection System Installation Requirements	Y	C	
8-34-304.1	Based on Waste Age For Inactive or Closed Areas	Y	C	
8-34-304.2	Based on Waste Age For Active Areas	Y	C	
8-34-304.3	Based on Amount of Decomposable Waste Accepted	Y	C	
8-34-304.4	Based on NMOC Emission Rate	Y	C	
8-34-305	Wellhead Requirements (unless operating under alternative wellhead requirements)	Y	C	
8-34-305.1	Wellhead Vacuum Requirements	Y	C	
8-34-305.2	Wellhead Temperature Limit	Y	C	
8-34-305.3	Nitrogen Concentration Limit for Wellhead Gas or	Y	C	
8-34-305.4	Oxygen Concentration Limit for Wellhead Gas	Y	C	
8-34-405	Design Capacity Reports	Y	C	
8-34-408	Collection and Control System Design Plans	Y	C	
8-34-408.2	Sites With Existing Collection and Control Systems	Y	C	
8-34-411	Annual Report	Y	C	
8-34-412	Compliance Demonstration Tests	Y	C	
8-34-413	Performance Test Report	Y	C	
8-34-414	Repair Schedule for Wellhead Excesses	Y	C	

Compliance Certification Report

Site #: A9013

Address: 1601 Dixon Landing Road

Source #: S-2, S-5, S-6

Site Name: Newby Island Landfill

City: Milpitas, CA

Source Name: MSW Landfill - Waste Decomposition Process Equipped with LFG Collection System (S-2), abated Flares (A-2 and A-3), Waste and Cover Material Dumping (S-5), Excavating, Bulldozing, and Compacting Activities (S-6)

Reporting Period: 02/1/2021 to 01/31/2022

Zip Code: 95035

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Continuous or Intermittent	Comments
8-34-414.1	Records of Excesses	Y	C	
8-34-414.2	Corrective Action	Y	C	
8-34-414.3	Collection System Expansion	Y	C	
8-34-414.4	Operational Due Date for Expansion	Y	C	
8-34-415	Repair Schedule for Surface Leak Excesses	Y	C	
8-34-415.1	Records of Excesses	Y	C	
8-34-415.2	Corrective Action	Y	C	
8-34-415.3	Re-monitor Excess Location Within 10 Days	Y	C	
8-34-415.4	Re-monitor Excess Location Within 1 Month	Y	C	
8-34-415.5	If No More Excesses, No Further Re-Monitoring	Y	C	
8-34-415.6	Additional Corrective Action	Y	C	
8-34-415.7	Re-monitor Second Excess Within 10 days	Y	C	
8-34-415.8	Re-monitor Second Excess Within 1 Month	Y	C	
8-34-415.9	If No More Excesses, No Further Re-monitoring	Y	C	
8-34-415.10	Collection System Expansion for Third Excess in a Quarter	Y	C	
8-34-415.11	Operational Due Date for Expansion	Y	C	
8-34-416	Cover Repairs	Y	C	
8-34-501	Operating Records	Y	C	
8-34-501.1	Collection System Downtime	Y	C	
8-34-501.2	Emission Control System Downtime	Y	C	
8-34-501.3	Continuous Temperature Records for Enclosed Combustors (applies to A-2 & A-3 only)	Y	C	
8-34-501.4	Testing	Y	C	
8-34-501.6	Leak Discovery and Repair Records	Y	C	
8-34-501.7	Waste Acceptance Records	Y	C	
8-34-501.8	Non-decomposable Waste Records	Y	C	

Compliance Certification Report

Site #: A9013

Address: 1601 Dixon Landing Road

Source #: S-2, S-5, S-6

Site Name: Newby Island Landfill

City: Milpitas, CA

Source Name: MSW Landfill - Waste Decomposition Process Equipped with LFG Collection System (S-2), abated Flares (A-2 and A-3), Waste and Cover Material Dumping (S-5), Excavating, Bulldozing, and Compacting Activities (S-6)

Reporting Period: 02/1/2021 to 01/31/2022

Zip Code: 95035

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Continuous or Intermittent	Comments
8-34-501.9	Wellhead Excesses and Repair Records	Y	C	
8-34-501.10	Gas Flow Rate Records for All Emission Control Systems	Y	C	
8-34-501.11	Records of Key Emission Control System Operating Parameters (Permit Holder shall ensure that Facility # B1670 will comply with this requirement whenever landfill gas is vented to the IC Engines: S-2, S-3, S-4, S-5, S-8, S-9, S11; at Facility # B1670)	Y	C	
8-34-501.12	Records Retention for 5 Years	Y	C	
8-34-503	Landfill Gas Collection and Emission Control System Leak Testing	Y	C	
8-34-504	Portable Hydrocarbon Detector	Y	C	
8-34-505	Well Head Monitoring	Y	C	
8-34-506	Landfill Surface Monitoring	Y	C	
8-34-507	Continuous Temperature Monitor and Recorder (applies to flare)	Y	C	
8-34-508	Gas Flow Meter	Y	C	
8-34-509	Key Emission Control System Operating Parameter(s) (Permit Holder shall ensure that Facility # B1670 will comply with this requirement whenever landfill gas is vented to the IC Engines: S-2, S-3, S-4, S-5, S-8, S-9, S11; at Facility # B1670)	Y	C	
8-34-510	Cover Integrity Monitoring	Y	C	
BAAQMD Regulation 8, Rule 40	Organic Compounds – Aeration of Contaminated Soil and Removal of Underground Storage Tanks (6/15/05)			
8-40-110	Exemption, Storage Pile	Y	C	
8-40-112	Exemption, Sampling	Y	C	
8-40-113	Exemption, Non-Volatile Hydrocarbons	Y	C	
8-40-116	Exemption, Small Volume	Y	C	
8-40-116.1	Volume does not exceed 1 cubic yard	Y	C	

Compliance Certification Report

Site #: A9013

Address: 1601 Dixon Landing Road

Source #: S-2, S-5, S-6

Site Name: Newby Island Landfill

City: Milpitas, CA

Source Name: MSW Landfill - Waste Decomposition Process Equipped with LFG Collection System (S-2), abated Flares (A-2 and A-3), Waste and Cover Material Dumping (S-5), Excavating, Bulldozing, and Compacting Activities (S-6)

Reporting Period: 02/1/2021 to 01/31/2022

Zip Code: 95035

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Continuous or Intermittent	Comments
8-40-116.2	Volume does not exceed 8 cubic yards, organic content does not exceed 500 ppmw, may be used only once per quarter	Y	C	
8-40-117	Exemption, Accidental Spills	Y	C	
8-40-118	Exemption, Aeration Projects of Limited Impact	Y	C	
8-40-301	Uncontrolled Contaminated Soil Aeration	Y	C	
8-40-304	Active Storage Piles	Y	C	
8-40-305	Inactive Storage Piles	Y	C	
BAAQMD Regulation 9, Rule 1	Inorganic Gaseous Pollutants – Sulfur Dioxide (3/15/95)			
9-1-301	Limitations on Ground Level Concentrations (applies to A-2/A-3 only)	Y	C	
9-1-302	General Emission Limitations (applies to A-2/A-3 only)	Y	C	
BAAQMD Regulation 9, Rule 2	Inorganic Gaseous Pollutants – Hydrogen Sulfide (10/6/99)			
9-2-301	Limitations on Hydrogen Sulfide	N	C	
40 CFR Part 60, Subpart A	Standards of Performance for New Stationary Sources – General Provisions (9/13/10)			
60.4	Address			
60.4(b)	Requires Submission of Requests, Reports, Applications, and Other Correspondence to the Administrator	Y	C	
60.7	Notification and Record Keeping	Y	C	
60.8	Performance Tests	Y	C	
60.11	Compliance with Standards and Maintenance Requirements	Y	C	
60.11(a)	Compliance determined by performance tests	Y	C	
60.11(d)	Control devices operated using good air pollution control practice	Y	C	
60.12	Circumvention	Y	C	

Compliance Certification Report

Site #: A9013

Address: 1601 Dixon Landing Road

Source #: S-2, S-5, S-6

Site Name: Newby Island Landfill

City: Milpitas, CA

Source Name: MSW Landfill - Waste Decomposition Process Equipped with LFG Collection System (S-2), abated Flares (A-2 and A-3), Waste and Cover Material Dumping (S-5), Excavating, Bulldozing, and Compacting Activities (S-6)

Reporting Period: 02/1/2021 to 01/31/2022

Zip Code: 95035

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Continuous or Intermittent	Comments
60.13	Monitoring Requirements	Y	C	
60.13(a)	Applies to all continuous monitoring systems	Y	C	
60.13(b)	Monitors shall be installed and operational before performing performance tests	Y	C	
60.13(e)	Continuous monitors shall operate continuously	Y	C	
60.13(f)	Monitors shall be installed in proper locations	Y	C	
60.13(g)	Requires multiple monitors for multiple stacks	Y	C	
60.14	Modification	Y	C	
60.15	Reconstruction	Y	C	
60.19	General Notification and Reporting Requirements	Y	C	
40 CFR Part 60, Subpart Cc	Standards of Performance for New Stationary Sources – Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills (2/24/99)			
60.36c	Compliance Times	Y	C	
60.36c(a)	Collection and Control Systems in Compliance by 30 months after Initial NMOC Emission Rate Report Shows NMOC Emissions \geq 50 MG/year	Y	C	
40 CFR Part 62	Approval and Promulgation of State Plans for Designated Facilities and Pollutants (9/20/01)			
62.1115	Identification of Sources	Y	C	

Compliance Certification Report

Site #: A9013

Address: 1601 Dixon Landing Road

Source #: S-2, S-5, S-6

Site Name: Newby Island Landfill

City: Milpitas, CA

Source Name: MSW Landfill - Waste Decomposition Process Equipped with LFG Collection System (S-2), abated Flares (A-2 and A-3), Waste and Cover Material Dumping (S-5), Excavating, Bulldozing, and Compacting Activities (S-6)

Reporting Period: 02/1/2021 to 01/31/2022

Zip Code: 95035

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Continuous or Intermittent	Comments
40 CFR Part 63, Subpart A	National Emission Standards for Hazardous Air Pollutants: General Provisions (12/22/08)			
63.4	Prohibited activities and circumvention	Y	C	
63.5	Preconstruction review and notification requirements	Y		
63.5(b)	Requirements for existing, newly constructed, and reconstructed sources	Y	C	
63.6	Compliance with standards and maintenance requirements	Y	C	
63.6(e)	Operation and maintenance requirements and SSM Plan	Y	C	
63.6(f)	Compliance with non-opacity emission standards	Y	C	
63.10	Record keeping and reporting requirements	Y	C	
63.10(b)	General record keeping requirements	Y	C	
63.10(b)(2)	For affected sources, maintain relevant records of:			
63.10(b)(2)(i-v)	Records for startup, shutdown, malfunction, and maintenance	Y	C	
63.10(b)	General reporting requirements	Y	C	
63.10(d)(5)	Startup, Shutdown, and Malfunction (SSM) Reports	Y	C	
40 CFR Part 63, Subpart AAAAA	National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills (4/20/06)			
63.1945	When do I have to comply with this subpart?	Y	C	
63.1945(b)	Compliance date for existing affected landfills	Y	C	
63.1955	What requirements must I meet?	Y	C	
63.1955(a)	Comply with either 63.1955(a)(1) or (a)(2)	Y	C	
63.1955(a)(2)	Comply with State Plan that implements 40 CFR Part 60, Subpart Cc	Y	C	

Compliance Certification Report

Site #: A9013

Address: 1601 Dixon Landing Road

Source #: S-2, S-5, S-6

Site Name: Newby Island Landfill

City: Milpitas, CA

Source Name: MSW Landfill - Waste Decomposition Process Equipped with LFG Collection System (S-2), abated Flares (A-2 and A-3), Waste and Cover Material Dumping (S-5), Excavating, Bulldozing, and Compacting Activities (S-6)

Reporting Period: 02/1/2021 to 01/31/2022

Zip Code: 95035

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Continuous or Intermittent	Comments
63.1955(b)	Comply with 63.1960-63.1985, if a collection and control system is required by 40 CFR Part 60, Subpart WWW or a State Plan implementing 40 CFR Part 60, Subpart Cc	Y	C	
63.1955(c)	Comply with all approved alternatives to standards for collection and control systems plus all SSM requirements and 6 month compliance reporting requirements	Y	C	
63.1960	How is compliance determined?	Y	C	
63.1965	What is a deviation?	Y	C	
63.1975	How do I calculate the 3-hour block average used to demonstrate compliance?	Y	C	
63.1980	What records and reports must I keep and submit?	Y	C	
63.1980(a)	Comply with all record keeping and reporting requirements in 40 CFR Part 60, Subpart WWW or the State Plan implementing 40 CFR Part 60, Subpart Cc, except that the annual report required by 40 CFR 60.757(f) must be submitted every 6 months	Y	C	
63.1980(b)	Comply with all record keeping and reporting requirements in 40 CFR Part 60, Subpart A and 40 CFR Part 63, Subpart A, including SSM Plans and Reports	Y	C	
BAAQMD Condition # 10423				
Part 1	Design capacity and waste acceptance rate limits (Regulations 2-1-234.3 and 2-1-301)	Y	C	
Part 2	Handling procedures for soils containing VOCs (Regulation 8-40-301, 8-40-304, and 8-40-305)	Y	C	

Compliance Certification Report

Site #: A9013

Address: 1601 Dixon Landing Road

Source #: S-2, S-5, S-6

Site Name: Newby Island Landfill

City: Milpitas, CA

Source Name: MSW Landfill - Waste Decomposition Process Equipped with LFG Collection System (S-2), abated Flares (A-2 and A-3), Waste and Cover Material Dumping (S-5), Excavating, Bulldozing, and Compacting Activities (S-6)

Reporting Period: 02/1/2021 to 01/31/2022

Zip Code: 95035

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Continuous or Intermittent	Comments
Part 3	Emission limit for low VOC soils (Regulation 8-2-301)	Y	C	At the time of the submittal of this report, Newby has not finished compiling VOC soil records. SCS will submit a Title V semi-annual report amendment to confirm compliance once records are available for review.
Part 4	Particulate emission control measures (Regulations 2-1-403, 6-1-301, and 6-1-305)	Y	C	
Part 5	Control requirements for collected landfill gas (Regulation 8-34-301.1 and 8-34-404)	Y	C	
Part 6	Landfill gas collection system description (Regulations 2-1-301, 8-34-301.1, 8-34-304, and 8-34-305)	Y	C	
Part 7	Landfill gas collection system operating requirements (Regulation 8-34-301.1)	Y	C	
Part 8	Flare heat input limits (Regulation 2-1-301)	Y	C	
Part 9	Flare temperature limits (Regulation 2-5-301, 2-5-302, and 8-34-301.3)	Y	C	
Part 10a	Landfill gas sulfur content limit and monitoring (Regulation 9-1-302)	Y	I	On March 31, 2021, during the First Quarter 2021 monitoring event, an exceedance of the annual integrated average of 300 parts per million by volume (ppmv) for total reduced sulfur compounds (TRS) in the collected landfill gas (LFG) at Newby Island was discovered. For additional information, including corrective actions taken, please see the April 8, 2021 30-Day Response Letter. As of June 30, 2021, the site is in compliance with the annual integrated average of 300 ppmv.
Part 10b	Limits for flare gas NOx (RACT, Cumulative Increase)	Y	C	

Compliance Certification Report

Site #: A9013

Address: 1601 Dixon Landing Road

Source #: S-2, S-5, S-6

Site Name: Newby Island Landfill

City: Milpitas, CA

Source Name: MSW Landfill - Waste Decomposition Process Equipped with LFG Collection System (S-2), abated Flares (A-2 and A-3), Waste and Cover Material Dumping (S-5), Excavating, Bulldozing, and Compacting Activities (S-6)

Reporting Period: 02/1/2021 to 01/31/2022

Zip Code: 95035

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Continuous or Intermittent	Comments
Part 11	Annual source test (Regulations 8-34-301.3 and 8-34-412)	Y	C	
Part 12	Annual landfill gas characterization test (AB-2588 Air Toxics Hot Spots Act 2-5-302, and Regulation 8-34-412, and 9-1-302)	Y	C	
Part 13	Record keeping requirements (Cumulative Increase, Regulations 2-1-301, 2-6-501, 6-1-301, 6-1-3058-34-301, 8-34-304, and 8-34-501)	Y	C	
Part 14	Reporting periods and report submittal due dates for the Regulation 8, Rule 34 report (Regulation 8-34-411 and 40 CFR 63.1980(a))	Y	C	

Compliance Certification Report

Site #: A9013
 Address: 1601 Dixon Landing Road
 Source #: S-3

Site Name: Newby Island Landfill
 City: Milpitas, CA
 Source Name: Composting Operation (S-3),
 Water Truck (A-3)

Reporting Period: 02/1/2021 to 01/31/2022
 Zip Code: 95035

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Continuous or Intermittent	Days out of compliance / Comments
BAAQMD Regulation 6	Particulate Matter – General Requirements (12/5/07)			
6-1-301	Ringelmann No. 1 Limitation	N	C	
6-1-305	Visible Particles	N	C	
6-1-401	Appearance of Emissions	N	C	
SIP Regulation 6	Particulate Matter and Visible Emissions (9/4/98)			
6-301	Ringelmann No. 1 Limitation	Y	C	
6-305	Visible Particles	Y	C	
6-401	Appearance of Emissions	Y	C	
BAAQMD Regulation 8, Rule 2	Organic Compounds – Miscellaneous Operations (7/20/05)			
8-2-301	Miscellaneous Operations	Y	C	
BAAQMD Condition #8178				
Part 1	Particulate emission control measures – material handling (Regulations 2-1-403, 6-1-301, and 6-1-305)	Y	C	
Part 2	Particulate emission control measures – roadways (Regulations 2-1-403, 6-1-301, and 6-1-305)	Y	C	
Part 3	Visible emissions and dust fallout (Regulations 1-301, 2-1-403, 6-1-301, and 6-1-305)	Y	C	
Part 4	Observation of Emissions Source (Regulations 2-1-403, 6-1-301, and 6-1-305)	Y	C	
Part 5	“Public Nuisance” permitting requirement (Regulations 1-301 and 2-1-317)	N	C	

Compliance Certification Report

Site #: A9013

Address: 1601 Dixon Landing Road

Source #: S-4

Site Name: Newby Island Landfill

City: Milpitas, CA

Source Name: Non-Retail Gasoline Dispensing
Facility

Reporting Period: 02/1/2021 to 01/31/2022

Zip Code: 95035

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Continuous or Intermittent	Days out of compliance / Comments
BAAQMD Regulation 8, Rule 5	Organic Compounds – Storage of Organic Liquids (10/18/06)			
8-5-116	Exemption, Gasoline Storage Tanks at Gasoline Dispensing Facilities	N	C	
SIP Regulation 8, Rule 5	Organic Compounds – Storage of Organic Liquids (6/5/03)			
8-5-206	Gas Tight	Y	C	
8-5-301	Storage Tank Control Requirements	Y	C	
8-5-303	Requirements for Pressure Vacuum Valves	Y	C	
8-5-303.1	Pressure Setting	Y	C	
8-5-303.2	Gas Tight	Y	C	
8-5-403	Inspection Requirements for Pressure Vacuum Valve			
8-5-501	Records	Y	C	
8-5-501.1	Types and amounts of materials stored	Y	C	
8-5-503	Portable Hydrocarbon Detector			
BAAQMD Regulation 8, Rule 7	Organic Compounds – Gasoline Dispensing Facilities (11/6/02)			
8-7-113	Tank Gauging and Inspection Exemption	Y	C	
8-7-114	Stationary Tank Testing Exemption	Y	C	
8-7-116	Periodic Testing Requirements Exemption	Y	C	
8-7-301	Phase I Requirements	Y	C	
8-7-301.1	Requirements for Transfers into Stationary Tanks, Cargo Tanks, and Mobile Refuelers	Y	C	

Compliance Certification Report

Site #: A9013

Address: 1601 Dixon Landing Road

Source #: S-4

Site Name: Newby Island Landfill

City: Milpitas, CA

Source Name: Non-Retail Gasoline Dispensing
Facility

Reporting Period: 02/1/2021 to 01/31/2022

Zip Code: 95035

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Continuous or Intermittent	Days out of compliance / Comments
8-7-301.2	CARB Certification Requirements	Y	C	
8-7-301.3	Submerged Fill Pipe Requirement	Y	C	
8-7-301.5	Maintenance and Operating Requirement	Y	C	
8-7-301.6	Leak-Free and Vapor Tight Requirement for Components	Y	C	
8-7-301.7	Fitting Requirements for Vapor Return Line	Y	C	
8-7-301.8	Coaxial Phase I Systems Certified by CARB prior to January 1, 1994 may not be installed on New or Modified Systems	Y	C	
8-7-301.9	Anti-rotational Coupler or Swivel Adapter Required	Y	C	
8-7-301.10	Vapor Recovery Efficiency Requirements for New and Modified Systems	Y	C	
8-7-301.12	Spill Box Drain Valve Limitation			
8-7-301.13	Annual Vapor Tightness Test Requirement	Y	C	
8-7-302	Phase II Requirements	Y	C	
8-7-302.1	Requirements for Transfers into Motor Vehicle Fuel Tanks	Y	C	
8-7-302.2	Maintenance Requirement	Y	C	
8-7-302.3	Proper Operation and Free of Defects Requirements	Y	C	
8-7-302.4	Repair Time Limit for Defective Components	Y	C	
8-7-302.5	Leak-Free and Vapor Tight Requirement for Components	Y	C	
8-7-302.6	Requirements for Bellows Nozzles	Y	C	
8-7-302.7	Requirements for Vapor Recovery Nozzles on Balance Systems	Y	C	
8-7-302.8	Minimum Liquid Removal Rate	Y	C	
8-7-302.9	Coaxial Hose Requirement	Y	C	
8-7-302.10	Construction Materials Specifications	Y	C	
8-7-302.12	Liquid Retain Limitation	Y	C	
8-7-302.13	Nozzle Spitting Limitation	Y	C	
8-7-302.14	Annual Back Pressure Test Requirements for Balance Systems	Y	C	

Compliance Certification Report

Site #: A9013

Address: 1601 Dixon Landing Road

Source #: S-4

Site Name: Newby Island Landfill

City: Milpitas, CA

Source Name: Non-Retail Gasoline Dispensing
Facility

Reporting Period: 02/1/2021 to 01/31/2022

Zip Code: 95035

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Continuous or Intermittent	Days out of compliance / Comments
8-7-303	Topping Off	Y	C	
8-7-306	Prohibition of Use	Y	C	
8-7-307	Posting of Operating Instructions	Y	C	
8-7-308	Operating Practices	Y	C	
8-7-309	Contingent Vapor Recovery Requirement	Y	C	
8-7-313	Requirements for New or Modified Phase II Installations	Y	C	
8-7-316	Pressure Vacuum Valve Requirements, Aboveground Storage Tanks and Vaulted Below Grade Storage Tanks	Y	C	
8-7-401	Equipment Installation and Modification	Y	C	
8-7-406	Testing Requirements, New and Modified Installations	Y	C	
8-7-407	Periodic Testing Requirements	Y	C	
8-7-408	Periodic Testing Notification and Submission Requirements	Y	C	
8-7-501	Burden of Proof	Y	C	
8-7-502	Right of Access	Y	C	
8-7-503	Record Keeping Requirements	Y	C	
8-7-503.1	Gasoline Throughput Records	Y	C	
8-7-503.2	Maintenance Records	Y	C	
8-7-503.3	Records Retention Time	Y	C	
40 CFR Part 63, Subpart A	National Emission Standards for Hazardous Air Pollutants- General Provisions (9/13/10)			
63.4	Prohibited activities and circumvention	Y	C	
63.5	Preconstruction review and notification requirements	Y	C	
63.5(b)	Requirements for existing, newly constructed, and reconstructed sources	Y	C	
63.6	Compliance with standards and maintenance requirements	Y	C	
63.8	Monitoring requirements	Y	C	

Compliance Certification Report

Site #: A9013

Address: 1601 Dixon Landing Road

Source #: S-4

Site Name: Newby Island Landfill

City: Milpitas, CA

Source Name: Non-Retail Gasoline Dispensing Facility

Reporting Period: 02/1/2021 to 01/31/2022

Zip Code: 95035

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Continuous or Intermittent	Days out of compliance / Comments
63.10	Record keeping and reporting requirements	Y	C	
63.10(b)	General record keeping requirements	Y	C	
63.10(c)	Additional record keeping requirements for sources with continuous monitoring systems	Y	C	
63.10(d)	General reporting requirements	Y	C	
63.10(e)	Additional reporting requirements for sources with continuous monitoring systems	Y	C	
40 CFR Part 63, Subpart CCCCCC	National Emission Standards for Hazardous Air Pollutants for Gasoline Dispensing Facilities (1/24/2011)			
63.11110	What is the purpose of this subpart?	Y	C	
63.11111	Am I Subject to the requirements in this subpart	Y	C	
63.11111(a)	Each GDF that is located at an area source	Y	C	
63.11111(b)	Monthly throughput of 10,000 gallons of gasoline or less subject to 63.11116	Y	C	
63.11111(e)	Demonstrate their monthly throughput level as specified in 63.11112(d)	Y	C	
63.11111(i)	If throughput ever exceeds an applicable throughput threshold, the affected source will remain subject to the requirements for sources above the threshold	Y	C	
63.11112	What parts of my affected source does this subpart cover?	Y	C	
63.11112(a)	Gasoline storage tanks and associated equipment components in vapor or liquid gasoline service	Y	C	
63.11112(d)	An affected source is an existing affected source if it is not new or reconstructed	Y	C	
63.11113	When do I have to comply with this subpart?	Y	C	
63.11113(c)	If affected source becomes subject to control requirements in this subpart because of monthly throughput increases per 63.11111(c) , you must comply with standard no later than 3 years after the affected source is subject to control requirements	Y	C	

Compliance Certification Report

Site #: A9013

Address: 1601 Dixon Landing Road

Source #: S-4

Site Name: Newby Island Landfill

City: Milpitas, CA

Source Name: Non-Retail Gasoline Dispensing
Facility

Reporting Period: 02/1/2021 to 01/31/2022

Zip Code: 95035

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Continuous or Intermittent	Days out of compliance / Comments
63.11113(e)	Initial compliance demonstration test	Y	C	
63.11113(e)(2)	For existing affected source, you must conduct the initial compliance test as specified in paragraphs (e)(2)(i)	Y	C	
63.11113(e)(2)(i)	For vapor balance systems installed on or before December 15, 2009, you must test no later than 180 days after the applicable compliance date specified in paragraph c of this section	Y	C	
63.11115	What are my general duties to minimize emissions?	Y	C	
63.1115(a)	Operate and maintain affected source safety and to minimize emissions	Y	C	
63.1115(b)	Keep applicable records and submit reports as specified in 63.11125(d) and 63.11126(b)	Y	C	
63.11116	Requirements for facilities with monthly throughput of less than 10,000 gallons of gasoline	Y	C	
63.11116(a)	Gasoline handling requirements	Y	C	
63.11116(a)(1)	Minimize gasoline spills	Y	C	
63.11116(a)(2)	Clean up spills as expeditiously as practicable	Y	C	
63.11116(a)(3)	Cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use	Y	C	
63.11116(a)(4)	Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices- such as oil/water separators	Y	C	
63.11117	Requirements for facilities with monthly throughput of 10,000 gallons of gasoline or more	Y	C	
63.11117(a)	Comply with the requirements in section 63.11116(a)	Y	C	
63.11117(b)	Only load gasoline into storage tanks utilizing submerged filling as defined in 63.11132 and as specified below	Y	C	
63.11117(b)(1)	Submerged fill pipes installed on or before November 9, 2006 must be no more than 12 inches from the bottom of the tank.	Y	C	
63.11117(d)	Throughput records available within 24 hours	Y	C	
63.11117(e)	You must submit the applicable notification as specified in 63.11124(a)	Y	C	

Compliance Certification Report

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Site Name: Newby Island Landfill

City: Milpitas, CA

Source Name: Non-Retail Gasoline Dispensing
Facility

Reporting Period: 02/1/2021 to 01/31/2022

Zip Code: 95035

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Continuous or Intermittent	Days out of compliance / Comments
63.11117(f)	You must comply with the requirements of this subpart by the applicable dates contained in 63.11113	Y	C	
63.11124	What notifications must I submit and when?	Y	C	
63.11124(a)	If subject to the control requirements in Section 63.11117, you must comply with (a)(1-3)	Y	C	
63.11124(a)(3)	Waiver of notification requirements if operating in compliance with a local or state requirement	Y	C	
63.11125	What are my recordkeeping requirements?	Y	C	
63.11125(d)	Keep records as specified in paragraphs (d)(1) and (d)(2) of this section	Y	C	
63.11125(d)(1)	Records of the occurrence and duration of each malfunction of operation or of air pollution control and monitoring equipment	Y	C	
63.11125(d)(2)	Records of actions taken during periods of malfunction to minimize emissions in accordance with Section 63.1115(a)	Y	C	
63.11126	What are my reporting requirements?	Y	C	
63.11126(b)	Each owner or operator of an affected source under this subpart shall report by March 15 of each year, the number, duration and a brief description of each type of malfunction which occurred during the previous calendar year and which caused any applicable emission limitation to be exceeded.	Y	C	
63.11130	What parts of the General Provisions apply to me?	Y	C	
Table 3 to Subpart CCCCCC of Part 63	Applicability of General Provisions	Y	C	
BAAQMD Condition # 14098	Gasoline Annual Throughput Limit (Regulation 2-5-301)	N	C	
BAAQMD Condition # 16516	Annual (every 12 month) static pressure testing (leak test) including BAAQMD notification, protocols, reporting requirements.	N	C	

Compliance Certification Report

Site #: A9013
Address: 1601 Dixon Landing Road
Source #: S-4

Site Name: Newby Island Landfill
City: Milpitas, CA
Source Name: Non-Retail Gasoline Dispensing Facility

Reporting Period: 02/1/2021 to 01/31/2022
Zip Code: 95035

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Continuous or Intermittent	Days out of compliance / Comments
State of California, Air Resources Board, Executive Order G-70-148-A	Certification of Hoover Containment Systems, Inc. "Lube Cube" Aboveground Filling/Dispensing Vapor Recovery System (05/04/95)	N	C	
State of California, Air Resources Board, Executive Order G-70-102-A	Certification of a Phase I Vapor Recovery System for Aboveground Storage Tanks with Less Than 40,000 Gallons Capacity for Gasoline or Gasoline/Methanol Blended Fuel (5/25/93)	N	C	
State of California, Air Resources Board, Executive Order G-70-52-AM	Certification of Components for Red Jacket, Hirt, and Balance Phase II Vapor Recovery System (10/4/91)	N	C	

Compliance Certification Report

Site #: A9013

Address: 1601 Dixon Landing Road

Source #: S-8, S-9

Site Name: Newby Island Landfill

City: Milpitas, CA

Source Name: Horizontal Grinder/Operation (S-8), Trommel Screen/Operation (S-9)

Reporting Period: 02/1/2021 to 01/31/2022

Zip Code: 95035

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Continuous or Intermittent	Days out of compliance / Comments
BAAQMD Regulation 1	General Provisions and Definitions (5/4/11)			
1-301	Public Nuisance	N	C	
BAAQMD Regulation 6, Rule 1	Particulate Matter – General Requirements (12/5/07)			
6-1-301	Ringelmann No. 1 Limitation	N	C	
6-1-305	Visible Particles	N	C	
6-1-311	Process Weight Limitation	N	C	
6-1-401	Appearance of Emissions	N	C	
SIP Regulation 6	Particulate Matter and Visible Emissions (9/4/98)			
6-301	Ringelmann No. 1 Limitation	Y	C	
6-305	Visible Particles	Y	C	
6-311	Process Weight Limitation	Y	C	
6-401	Appearance of Emissions	Y	C	
Registration	CARB Statewide Portable Equipment Registration Conditions			
#149997	Parts 1-7, 19-26 and 33 for S-8	N	C	
#125994	Parts 1-7, 29-25, and 23-35 for S-9	N	C	