Newby Island Landfill 1601 Dixon Landing Road, Milpitas, CA 95035
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TV Tracking #: 691

1. ☐ RECEIVED IN ENFORCEMENT: 02/28/2023

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

Director of the Air Division, USEPA Region IX
75 Hawthorne Street
San Francisco, CA 94105
Attn: Air-3

Subject: Combined NESHAP Semi-Annual Report, Report, 8-34 Semi-Annual Report, Title V Semi-Annual Monitoring Report and SSM Plan Report
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) Semi-Annual Report, Bay Area Air Quality Management District (BAAQMD), Regulation 8, Rule 34 Semi-Annual Report, Semi-Annual Startup, Shutdown and Malfunction (SSM) Plan Report, and Title V Semi-Annual Monitoring Report to the BAAQMD and the U.S. Environmental Protection Agency (USEPA) Region IX for the Newby Island Landfill (Newby). The NESHAP report, 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, 2022 through January 31, 2023.

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). This report also satisfies the reporting requirements under NESHAP AAAA. 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. Please note, 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 bwade@republicservices.com.

Sincerely,

Ben Wade
Area Environmental Manager
Newby Island Landfill

cc: Maria Bowen, SCS Engineers
Pat Sullivan, SCS Engineers
Meghan Caesar, SCS Engineers

NESHAP/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:

International Disposal Corporation of California
1601 Dixon Landing Road
Milpitas, CA 95035

For Submittal to:

Bay Area Air Quality Management District
375 Beale Street, Suite 600
San Francisco, CA 94105

SCS ENGINEERS

01205162.04 Task 7 | February 2023

4683 Chabot Drive, Suite 200
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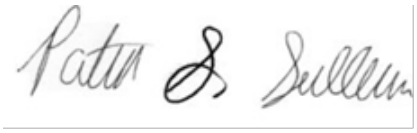
This submittal consisting of the National Emission Standards for Hazardous Air Pollutants (NESHAP)/New Source Performance Standards (NSPS)/Bay Area Air Quality Management District (BAAQMD) Rule 8-34 Semi-Annual Report, the Semi-Annual Startup, Shutdown, and Malfunction Plan Report, and the Title V Semi-Annual Monitoring Report for the Newby Island Landfill in Milpitas, California, dated February 2023, was prepared and reviewed by the following:

Meghan Caesar
Project Professional
SCS ENGINEERS

Maria Bowen
Project Manager
SCS ENGINEERS



Patrick S. Sullivan, REA, CPP, BCES
Senior Vice President
SCS ENGINEERS

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SECTION I. NESHAP/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 Semi-Annual National Emission Standards for Hazardous Air Pollutants (NESHAP) Report, New Source Performance Standard (NSPS), 40 Code of Federal Regulations (CFR) Part 60, Subparts WWW and XXX / 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, 2022 through January 31, 2023 to the BAAQMD for the Newby Island Sanitary Landfill and Recyclery (Newby).

This Semi-Annual report also meets the requirements of the NESHAP for Municipal Solid Waste (MSW)landfills, 40 CFR 63, Subpart AAAA and complies with the requirements specified in Newby's Title V permit. As of June 21, 2021, the facility complies with the new Emission Guidelines (EG) requirements in California. The approved state plan for the EG includes compliance with Title 17 California Code of Regulations (CCR) Sections 95460 to 95476, known as AB 32 Landfill Methane Rule (LMR) and specific portions of 40 CFR Part 62 Subpart OOO.

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, Subpart XXX (which were updated NSPS for MSW landfills promulgated in 2016) as well as removing the SSM Plan requirements. However, because the Title V Permit references Subpart WWW and SSM requirements, this semi-annual report will continue to include Subpart WWW and an SSM Plan report. A separate annual Subpart XXX report will also be submitted for the January 1 through December 31, 2022 reporting period. Following that submittal, all Subpart XXX reporting be submitted in this combined semi-annual report per the latest NSPS/NESHAP regulatory updates. References to Subpart WWW and SSM 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 requirements, Newby is continuing to report semi-annually under the existing Title V which includes NSPS Subpart WWW requirements and Rule 8-34. This report also covers reporting requirements under NSPS Subpart XXX and NESHAP Subpart AAAA.

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, 2022 through January 31, 2023. 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)
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 91.43 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 13 events.

These events occurred on the following dates:

- August 3, 2022 (IDs 08K68 and 08K69) – high flow)
- August 5, 2022 (IDs 08K80 and 08K81 – high flow)
- August 7, 2022 (IDs 08K84 and 08K85 – high flow)
- September 5, 2022 (IDs 08L46 and 08L47 – Variable Frequency Drive [VFD] malfunction)
- September 6, 2022 (IDs 08L63 and 08L64 – utility outage
- September 15, 2022 (IDs 08L86 and 08L87 – flame failure
- October 6, 2022 (IDs 08M37 and 08M38 – air compressor leak)
- October 9, 2022 (IDs 08M51 and 08M52 – liquids accumulation)
- October 19, 2022 (IDs 08M62 and 08M63 – liquids accumulation)
- December 1, 2022 (IDs 08N89 and 08N90 – utility outage)
- December 10, 2022 (IDs 08P09 and 08P10 – low flow)
- December 11, 2022 (IDs 08P12 and 08P13 – oxygen intrusion)
- December 13, 2022 (IDs 08P14 and 08P15 – low flow)

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.

The following Notices of Violation (NOVs) were issued to IDCC by BAAQMD Inspectors for alleged failure to operate the GCCS continuously during the RCA events noted below:

- October 14, 2022
    - NOV A61616 was issued by Ms. Aleah Zapf for Breakdown ID 08K84 and Excess Excursion ID 08K85 due to a preprogrammed precautionary shutdown caused by high LFG flow to the flare station that occurred on August 7, 2022.
    - NOV A61617 was issued by Ms. Aleah Zapf for Breakdown ID 08L46 and Excess Excursion ID 08L47 due to a variable frequency drive (VFD) malfunction caused by overheating that occurred on September 5, 2022.
    - NOV A61618 was issued by Ms. Aleah Zapf for Breakdown ID 08L63 and Excess Excursion ID 08L64 due to an unplanned utility power outage from Pacific Gas & Electric (PG&E) that occurred on September 6, 2022.
- January 11, 2023
    - NOV A59759 was issued by Mr. Jayendra Patel for Breakdown ID 08H21 and Excess Excursion ID 08H22 due to an unplanned utility power outage from PG&E that occurred on May 1 – 2, 2022.
    - NOV A61622 was issued by Ms. Aleah Zapf for Breakdown ID 08N89 and Excess Excursion ID 08N90 due to an unplanned utility power outage from PG&E that occurred on December 1, 2022.

- January 26, 2023
    - NOV A61625 was issued by Ms. Aleah Zapf for Breakdown ID 08P12 and Excess Excursion ID 08P13 due to a preprogrammed precautionary shutdown caused by low LFG flow to the flare station from a potential oxygen intrusion in the wellfield that occurred on December 11, 2022.
    - NOV A61626 was issued by Ms. Aleah Zapf for Breakdown ID 08P13 and Excess Excursion ID 08P14 due to a preprogrammed precautionary shutdown caused by low LFG flow to the flare station from a potential oxygen intrusion in the wellfield that occurred on December 13, 2022.

For additional information, including corrective actions taken, please refer to the respective 10-Day Deviation Letters and NOV Response Letters previously submitted to BAAQMD.

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. GCCS downtime is accrued when the A-2 and A-3 Flares are concurrently offline.

3.1.2 Emission Control System Downtime

During the reporting period, the A-2 and A-3 Flares were inidividually 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 762.43 hours and for the A-3 Flare over a cumulative period of approximately 262.00 hours. Downtime of the GCCS was minimized to limit surface emissions. These hours are only related to individual flare downtime, not downtime of the entire GCCS. During each control device downtime event, the gas flow to the flares was shut down immediately, resulting in no free venting of LFG. This met the work practice standard of the NESHAP and NSPS rules.

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.

IDCC submitted a Request 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 prior to commencing each construction project, which included additional details concerning the temporary disconnection of individual LFG wells. IDCC submitted 118 Plans to the BAAQMD for the construction projects noted below on the following dates:

- February 19, 2021 for GCCS construction and cell filling activities;
- May 25, 2021 for Overliner Cell 1A construction and GCCS construction (well abandonments/installs); and
- February 14, 2022 for Overliner Cell 1B/2 construction.

As of the end of the reporting period, a total of 23 wells remained offline at the end of the reporting period and will be reported as a startup once the filling operations and construction activities around each well cease and the wells are brought back online. Please note wells that remain offline in active construction areas were included in Combined Request for Limited Exemption and Rule 118 Construction Plan submittals to BAAQMD. Due to unforeseen circumstances during construction project duration, significant infrastructure issues have prevented wells from being returned online. Site and O&M personnel are coordinating with third party on a resolution to reestablish vacuum to the area and reconnect the remaining offline wells to the GCCS. Details of the well SSMs can be found in Table 2.

On January 9, 2023, the USEPA issued an NOV to IDCC for an alleged failure to operate the wellfield in compliance with NESHAP 40 CFR 63, Subpart AAAA, 40 CFR 60, Subpart WWW and Subpart XXX provisions, including failure to operate offline wells in accordance with operational, compliance, and monitoring requirements from July 14, 2021 through present. IDCC is currently working with USEPA on a resolution to operate in compliance with all regulatory requirements and permit conditions.

Details of individual well shutdown and well startups occurring during the reporting period are provided in Table 2. Compliance with or exemption from Rule 8-34 was met during each of these events. 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 1,454°F (1,504 °F minus 50 °F), based on the February 9, 2022 source test performed by Blue Sky Environmental, Inc. (final report issued on March 25, 2022). During the reporting period, the minimum temperature at which the A-3 flare was required to operate was 1,459°F (1,509 °F minus 82 °F), based on the February 9, 2022 source test performed by Blue Sky Environmental, Inc. (final report issued on March 25, 2022). 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 2022 Monitoring

SCS Field Services (SCSFS) conducted the component leak testing of the wellfield and flare station on August 11, 2022. No component leaks above 1,000 ppmv were detected in the wellfield or at the flare station during the Third Quarter 2022 monitoring event.

BAAQMD personnel performed an additional component leak inspection in selected areas of the landfill on September 7, 2022. Two component leaks above 1,000 ppmv were detected in the wellfield during the event. However, the area the inspection was performed was an active construction area and therefore exempt from the requirements of BAAQMD Rule 8-34-503 per the criteria described in Rule 8-34-118.1. SCSFS field technicians performed the appropriate corrective actions, including additional well tuning and pulling and servicing pumps. On September 15, 2022, BAAQMD Inspector Ms. Aleah Zapf issued NOV ID A61613 for the component leaks detected during the site inspection. For additional information, including corrective actions taken and the approved Request for Limited Exemption "118 Plan", please refer to the respective 10-Day Deviation Letter and NOV Response submitted to the BAAQMD on September 23, 2022.

3.2.2 Fourth Quarter 2022 Monitoring

SCSFS conducted the component leak testing of the flare station and wellfield on October 20, 2022. No component leaks above 1,000 ppmv were detected in the wellfield or at the flare station during the Second Quarter 2022 monitoring event.

3.3 CONTROL EFFICIENCY

LFG Flares A-2 and A-3 was also tested on February 9, 2022 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 2022 source test was measured to be >98.76 percent by weight, and the NMOC as methane concentration in the flare outlet was <5.1 ppmv. The NMOC destruction efficiency for the A-3 Flare during the February 2022 source test was measured to be >98.59 percent by weight, and the NMOC as methane concentration in the flare outlet was <4.9 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 2022 source test report dated March 25, 2022, summarizing the test results, were provided in **Appendix D** of the February 2022 – July 2022 Semi-Annual Report submitted to BAAQMD on August 31, 2022.

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 2022 Monitoring

SCSFS field technicians monitored the landfill surface for leaks with a methane concentration of greater than 500 ppmv above background on August 8, 9, 10, 11, 12, 18, and 19, 2022. Surface emissions in excess of 500 ppmv were detected at twenty-six (26) locations during the third quarter 2022 monitoring event. The locations of the exceedances and associated methane concentrations are provided in the Third Quarter 2022 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 August 26, 2022 and the 30-day re-monitoring event on September 7, 2022. All the locations were under the 500 ppmv threshold. Based on these monitoring results no additional follow up testing was required at this time.

BAAQMD personnel performed an additional SEM event on September 7, 2022. Surface emissions in excess of 500 ppmv were detected at five locations during the event. However, the area the inspection was performed was an active construction area and therefore exempt from the requirements of BAAQMD Rules 8-34-303 and 8-34-506 per the criteria described in Rule 8-34-118.1. SCSFS field technicians performed appropriate corrective actions, including placement and compaction of additional cover material. On September 15, 2022, BAAQMD Inspector Ms. Aleah Zapf issued NOV A61613 for the surface leaks detected during the site inspection. For additional information, including corrective actions taken and the approved "118 Plan", please refer to the 10-Day Deviation Letter and NOV Response submitted to the BAAQMD on September 23, 2022.

3.4.1 Fourth Quarter 2022 Monitoring

SCSFS monitored the landfill surface for leaks with a methane concentration of greater than 500 ppmv above background on October 19, 20, and 21, 2022. Surface emissions in excess of 500 ppmv were detected at twenty-one (21) locations during the fourth quarter 2022 monitoring event.

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 events for these locations on October 28, 2022 and performed the 1-month re-monitoring event, as required by NSPS, on November 18, 2022. All the locations were under the 500 ppmv threshold. Based on these monitoring results no additional follow up testing was required.

As of submittal of this semi-annual report, the fourth quarter 2022 SEM report is in review. The final report, including the locations with exceedances and associated methane concentrations will be provided in the subsequent semi-annual report submittal.

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 NILEW620 and NILEW803 demonstrated a positive pressure reading at the end of the reporting period. These wells plan to 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 NILEW620, NILEW759, and NILEW803, were operating under positive pressure. These wells were returned under negative pressure or abandoned by the applicable compliance dates.

Per 40 CFR 63.1960(a)(3)(i), a "root cause analysis" (RCA) is required if pressure exceedances cannot be corrected in 15 days. An additional "corrective action analysis" (CAA) and notification is required for corrective actions that require more than 60 days to complete. See Section 3.5.4 for discussion of those additional corrective action requirements and **Appendix D** for RCA forms, CAA forms, and 75-day notifications.

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: 30RR, EW-13, I0IR, 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: NIL3EW31, NILEW644, NILEW669, NILEW680, NILEW705, NILW728A, NILEW759, NILEW802, NILEW805, NILMW004, NILMW005, NILMW006, NILMW007, NILMW008, NILMW011, NILMW031, NILMW032,

NILFC005, NILFC006, and NLCR0910 . The wells plan to 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 NILEW461, NILEW566, NILEW687, NILEW802, NILEW805, NILMW011, NILW728A, NLCR0910, 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.

Please note, the oxygen limit has been removed from Subparts XXX and AAAA; however, Newby complied with the oxygen limit during the reporting period per Rule 8-34 and its Title V permit.

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. Please note, Subpart AAAA allows wells to be operated in compliance up to 145°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 NILEW511, NILEW664, NILEW665, and NILEW701 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, well NILEW476 were operating with a temperature higher than 131°F. This well 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.

Per 40 CFR 63.1960(a)(4)(i), an RCA is required if temperature exceedances cannot be corrected in 15 days. An additional CAA and notification is required for corrective actions that require more than 60 days to complete. See Section 3.5.4 for discussion of those additional corrective action requirements and **Appendix D** for RCA forms, CAA forms, and 75-day notifications.

3.5.4 Corrective Action Analysis

RCAs were conducted for wells with temperature and pressure exceedances past 15 days. CAAs were performed for wells not corrected within 60 days. Moreover, 75-day notifications were submitted for any wells that could not be corrected within 60 days. The RCA and CAA forms and 75-day notifications are included in **Appendix D**.

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. During the reporting period, 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 30, September 29, October 28, November 29, December 30, 2022 and January 27, 2023 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 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.

3.8 ANNUAL WASTE ACCEPTANCE RATE AND REFUSE IN PLACE

Newby is an active landfill that continues to accept refuse for disposal. From August 1, 2022 through January 31, 2023, the site accepted 769,668.84 tons of decomposable waste and cover material, resulting in a cumulative waste-in-place total of 38,743,833.57 tons as of January 31, 2023.

3.8.1 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 AAAA, 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, 2022 through January 31, 2023 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 fifty-four (54) SSM events involving shutdown of the entire GCCS. Forty-one (41) of these events were planned startups/shutdowns and thirteen (13) of these startup/shutdown events were associated with a malfunction of the GCCS.

During the reporting period, there were sixty (60) 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 or construction activities. For wells offline due to construction activities, combined Requests for Limited Exemption and Rule 118 Construction Plans were submitted to the BAAQMD prior to commencing construction. A total of 24 wells remained offline as of the end of the reporting period and will be reported as startups once the landfilling and construction 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, 2022 through January 31, 2023 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.

Tables

Table 1a. GCCS Downtime
Newby Island Landfill, Milpitas, California
(August 1, 2022 through January 31, 2023)

Shutdown	Startup	Downtime Hours	Reason for Downtime	BAAQMD Exemption	Corrective Actions Taken
8/3/2022 21:22	**8/3/2022 21:30**	**0.13**	**High Flow (RCA Submitted)**	**RCA Submitted for this event (IDs 08K68 and 08K69)**	**O&M personnel completed inspection then restarted the flares.**
8/5/2022 22:28	**8/5/2022 22:40**	**0.20**	**High Flow (RCA Submitted)**	**RCA Submitted for this event (IDs 08K80 and 08K81)**	**O&M personnel completed inspection then restarted the flares.**
8/6/2022 10:30	8/6/2022 10:34	0.07	Flare Maintenance and Troubleshooting (113)	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
8/7/2022 19:38	**8/7/2022 19:44**	**0.10**	**High Flow (RCA Submitted)**	**RCA Submitted for this event (IDs 08K84 and 08K85)**	**O&M personnel completed inspection then restarted the flares.**
8/8/2022 17:02	8/8/2022 17:54	0.87	Flare Maintenance and Troubleshooting (113)	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
8/10/2022 13:00	8/10/2022 14:08	1.13	Flare Maintenance and Troubleshooting (113)	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
8/10/2022 15:14	8/10/2022 16:10	0.93	Flare Maintenance and Troubleshooting (113)	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
8/12/2022 11:36	8/12/2022 11:38	0.03	Flare Maintenance and Troubleshooting (113)	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
8/16/2022 7:48	8/16/2022 9:46	1.97	Flare Maintenance and Troubleshooting (113)	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
8/20/2022 13:06	8/20/2022 14:04	0.97	Flare Maintenance and Troubleshooting (113)	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
8/23/2022 11:22	8/23/2022 15:44	4.37	Flare Maintenance and Troubleshooting (113)	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
8/31/2022 10:14	8/31/2022 10:24	0.17	Flare Maintenance and Troubleshooting (113)	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
8/31/2022 12:50	8/31/2022 13:02	0.20	Flare Maintenance and Troubleshooting (113)	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
8/31/2022 13:14	8/31/2022 13:20	0.10	Flare Maintenance and Troubleshooting (113)	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
8/31/2022 15:06	8/31/2022 15:16	0.17	Flare Maintenance and Troubleshooting (113)	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
9/2/2022 10:48	9/2/2022 10:58	0.17	Flare Maintenance and Troubleshooting (113)	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
9/5/2022 13:16	**9/5/2022 16:46**	**3.50**	**Blower VFD Tripped (RCA Submitted)**	**RCA Submitted for this event (IDs 08L46 and 08L47)**	**O&M personnel completed maintenance and reset the VFD, inspected then restarted the flares.**
9/6/2022 13:10	**9/6/2022 17:08**	**3.97**	**PG&E Outage (RCA Submitted)**	**RCA Submitted for this event (IDs 08L63 and 08L64)**	**O&M personnel completed inspection then restarted the flares once power was restored.**
9/7/2022 11:26	9/7/2022 12:02	0.60	Flare Maintenance and Troubleshooting (113)	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
9/8/2022 11:44	9/8/2022 12:38	0.90	Flare Maintenance and Troubleshooting (113)	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
9/15/2022 5:04	**9/15/2022 7:20**	**2.27**	**Flame Failure (RCA Submitted)**	**RCA Submitted for this event (IDs 08L86 and 08L87)**	O&M personnel completed inspection then restarted the flares.
9/15/2022 8:52	9/15/2022 10:38	1.77	Flare Maintenance and Troubleshooting (113)	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
9/16/2022 7:14	9/16/2022 8:04	0.83	Flare Maintenance and Troubleshooting (113)	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
9/16/2022 9:16	9/16/2022 10:06	0.83	Flare Maintenance and Troubleshooting (113)	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
9/16/2022 12:30	9/16/2022 12:32	0.03	Flare Maintenance and Troubleshooting (113)	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
9/20/2022 8:48	9/20/2022 8:50	0.03	Flare Maintenance and Troubleshooting (113)	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
9/23/2022 10:34	9/23/2022 10:46	0.20	Flare Maintenance and Troubleshooting (113)	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
9/26/2022 9:48	9/26/2022 9:50	0.03	Flare Maintenance and Troubleshooting (113)	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
9/27/2022 17:34	9/27/2022 18:24	0.83	Flare Maintenance and Troubleshooting (113)	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
10/3/2022 17:10	10/3/2022 17:12	0.03	Low Gas Flow Shutdown (113)	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
10/5/2022 2:12	**10/5/2022 10:48**	**8.60**	**Air Compressor Failure (RCA Submitted)**	**RCA Submitted for this event (IDs 08M37 and 08M38)**	**O&M personnel contacted third party to inspect and service the air compressor. Following repairs, O&M completed inspection then restarted the flares.**
10/7/2022 21:12	10/7/2022 21:14	0.03	Manual Shutdown for Flare Maintenance (113)	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
10/9/2022 20:56	**10/9/2022 21:08**	**0.20**	**Liquids Surge in Field Causing Shutdown (RCA Submitted)**	**RCA Submitted for this event (IDs 08M51 and 08M52)**	**O&M personnel inspected flares and sump and restarted the flares.**
10/10/2022 13:08	10/10/2022 13:14	0.10	Low Gas Flow Shutdown (113)	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
10/19/2022 14:46	**10/19/2022 15:56**	**1.17**	**High Separator Alarm Shutdown (RCA Submitted)**	**RCA Submitted for this event (IDs 08M62 and 08M63)**	**O&M personnel emptied KOP, completed inspection then restarted the flares.**
10/25/2022 8:52	10/25/2022 8:56	0.07	Manual Shutdown for Flare Maintenance (113)	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
10/31/2022 10:00	10/31/2022 10:08	0.13	Low Gas Flow Shutdown (113)	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
11/2/2022 6:12	11/2/2022 15:20	9.13	Manual Shutdown for Flare Maintenance (113)	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
11/2/2022 15:44	11/2/2022 16:32	0.80	Manual Shutdown for Flare Maintenance (113)	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
11/11/2022 8:56	11/11/2022 12:32	3.60	Manual Shutdown for Scheduled Construction Header Tie-In (113)	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
12/1/2022 17:26	**12/1/2022 20:46**	**3.33**	**PG&E Outage (RCA Submitted)**	**RCA Submitted for this event (IDs 09N89 and 09N90)**	**O&M personnel completed inspection then restarted the flares once power was restored.**
12/1/2022 21:08	12/1/2022 21:24	0.27	Flare Maintenance and Troubleshooting (113)	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
12/2/2022 12:24	12/2/2022 12:40	0.27	Flare Maintenance and Troubleshooting (113)	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
12/10/2022 16:52	12/10/2022 16:56	0.07	Flare Maintenance and Troubleshooting (113)	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
12/10/2022 17:26	**12/11/2022 11:36**	**18.17**	**Air Compressor Shutdown/ Flame Failure (RCA Submitted)**	**RCA Submitted for this event (IDs 08L09 and 08L10)**	**O&M personnel contacted third party to inspect and service the air compressor. Following repairs, O&M completed inspection then restarted the flares.**
12/11/2022 23:00	**12/12/2022 7:52**	**8.87**	**Air Compressor Shutdown/ Flame Failure (RCA Submitted)**	**RCA Submitted for this event (IDs 08P12 and 08P13)**	**O&M personnel contacted third party to inspect and service the air compressor. Following repairs, O&M completed inspection then restarted the flares.**
12/13/2022 2:52	**12/13/2022 9:44**	**6.87**	**Air Compressor Shutdown/ Flame Failure (RCA Submitted)**	**RCA Submitted for this event (IDs 08P14 and 08P15)**	**O&M personnel contacted third party to inspect and service the air compressor. Following repairs, O&M completed inspection then restarted the flares.**
12/13/2022 9:56	12/13/2022 10:16	0.33	Low Gas Flow due to construction activities (113)	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
12/13/2022 18:42	12/13/2022 18:48	0.10	Low Gas Flow due to construction activities (113)	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
12/14/2022 12:36	12/14/2022 12:44	0.13	Low Gas Flow due to construction activities (113)	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
12/31/2022 19:26	12/31/2022 19:32	0.10	Low Gas Flow due to construction activities (113)	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, 2022 through January 31, 2023)

Shutdown	Startup	Downtime Hours	Reason for Downtime	BAAQMD Exemption	Corrective Actions Taken
1/3/2023 11:04	1/3/2023 11:24	0.33	Manual Shutdown for Flare Maintenance (113)	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
1/3/2023 16:08	1/3/2023 16:40	0.53	Manual Shutdown for Flare Maintenance (113)	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
1/26/2023 13:12	1/26/2023 14:02	0.83	Manual Shutdown for Flare Maintenance (113)	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
	Total:	**91.43**			

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 noted above. These events were considered reportable compliance activities (RCA) and breakdown relief was requested from the BAAQMD. All subsequent reporting was completed within the required timeframes.

Table 1b. Flare (A-2) Downtime
Newby Island Landfill, Milpitas, California
(August 1, 2022 through January 31, 2023)

Shutdown	Startup	Downtime Hours	Reason for Downtime and BAAQMD Exemption
8/3/2022 21:22	**8/3/2022 21:30**	**0.13**	**High Flow (RCA Submitted)**
8/4/2022 11:18	8/4/2022 11:24	0.10	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
8/5/2022 22:30	**8/6/2022 10:34**	**12.07**	**High Flow (RCA Submitted)**
8/7/2022 19:38	**8/7/2022 19:44**	**0.10**	**High Flow (RCA Submitted)**
8/8/2022 7:24	**8/12/2022 11:38**	**100.23**	**High Flow (RCA Submitted)**
8/16/2022 7:48	8/16/2022 9:50	2.03	Flare Maintenance and Troubleshooting (113)
8/20/2022 13:06	8/20/2022 14:18	1.20	Flare Maintenance and Troubleshooting (113)
8/23/2022 11:22	8/23/2022 15:44	4.37	Flare Maintenance and Troubleshooting (113)
8/31/2022 10:14	9/16/2022 12:32	386.30	Flare Maintenance and Troubleshooting (113)
9/16/2022 22:54	9/17/2022 9:54	11.00	Flare Maintenance and Troubleshooting (113)
9/17/2022 10:14	9/17/2022 10:30	0.27	Flare Maintenance and Troubleshooting (113)
9/17/2022 10:40	9/17/2022 10:50	0.17	Flare Maintenance and Troubleshooting (113)
9/18/2022 18:32	9/19/2022 10:40	16.13	Flare Maintenance and Troubleshooting (113)
9/20/2022 7:58	9/20/2022 8:50	0.87	Flare Maintenance and Troubleshooting (113)
9/20/2022 9:16	9/20/2022 9:40	0.40	Flare Maintenance and Troubleshooting (113)
9/23/2022 10:34	9/23/2022 10:46	0.20	Flare Maintenance and Troubleshooting (113)
9/23/2022 12:34	9/23/2022 12:42	0.13	Flare Maintenance and Troubleshooting (113)
9/24/2022 7:38	9/26/2022 9:24	49.77	Flare Maintenance and Troubleshooting (113)
9/26/2022 9:42	9/26/2022 9:50	0.13	Flare Maintenance and Troubleshooting (113)
9/26/2022 18:58	9/27/2022 8:32	13.57	Flare Maintenance and Troubleshooting (113)
9/27/2022 17:22	9/27/2022 18:24	1.03	Flare Maintenance and Troubleshooting (113)
10/3/2022 16:48	10/3/2022 17:12	0.40	Low Gas Flow due to construction activities (113)
10/4/2022 9:42	10/4/2022 10:42	1.00	High Stack Temperature Shutdown (113)
10/4/2022 16:22	10/4/2022 16:56	0.57	High Stack Temperature Shutdown (113)
10/4/2022 20:20	10/5/2022 10:48	14.47	High Stack Temperature Shutdown (113)
10/7/2022 18:26	10/7/2022 21:14	2.80	Flare Maintenance and Troubleshooting (113)
10/8/2022 16:12	10/10/2022 10:54	42.70	Flare Maintenance and Troubleshooting (113)
10/10/2022 11:14	10/10/2022 11:22	0.13	Flare Maintenance and Troubleshooting (113)
10/10/2022 12:28	10/10/2022 13:12	0.73	Flare Maintenance and Troubleshooting (113)
10/10/2022 13:32	10/10/2022 13:40	0.13	Flare Maintenance and Troubleshooting (113)
10/19/2022 14:44	**10/19/2022 15:56**	**1.20**	**High Separator Alarm Shutdown (RCA Submitted)**
10/19/2022 21:26	10/19/2022 22:02	0.60	Low Gas Flow due to construction activities (113)
10/23/2022 7:18	10/23/2022 10:42	3.40	Flare Maintenance and Troubleshooting (113)
10/23/2022 10:48	10/23/2022 10:54	0.10	Low Gas Flow due to construction activities (113)
10/23/2022 16:38	10/24/2022 12:32	19.90	Flare Maintenance and Troubleshooting (113)

Table 1b. Flare (A-2) Downtime
Newby Island Landfill, Milpitas, California
(August 1, 2022 through January 31, 2023)

Shutdown	Startup	Downtime Hours	Reason for Downtime and BAAQMD Exemption
10/24/2022 12:36	10/24/2022 12:56	0.33	Flare Maintenance and Troubleshooting (113)
10/24/2022 13:02	10/25/2022 8:38	19.60	Flare Maintenance and Troubleshooting (113)
10/25/2022 8:44	10/25/2022 8:56	0.20	Flare Maintenance and Troubleshooting (113)
10/31/2022 10:00	10/31/2022 10:08	0.13	Low Gas Flow due to construction activities (113)
11/2/2022 6:12	11/2/2022 15:20	9.13	Manual Shutdown for Flare Maintenance (113)
11/2/2022 15:44	11/2/2022 16:32	0.80	Manual Shutdown for Flare Maintenance (113)
11/11/2022 8:54	11/11/2022 12:32	3.63	Manual Shutdown for Scheduled Construction Header Tie-In (113)
12/1/2022 17:26	**12/1/2022 20:46**	**3.33**	**PG&E Outage (RCA Submitted)**
12/1/2022 21:08	12/1/2022 21:24	0.27	Flare Maintenance and Troubleshooting (113)
12/2/2022 12:24	12/2/2022 12:40	0.27	Flare Maintenance and Troubleshooting (113)
12/10/2022 16:52	12/10/2022 16:56	0.07	Flare Maintenance and Troubleshooting (113)
12/10/2022 17:26	**12/11/2022 11:38**	**18.20**	**Air Compressor Shutdown/ Flame Failure (RCA Submitted)**
12/11/2022 23:00	**12/12/2022 7:52**	**8.87**	**Air Compressor Shutdown/ Flame Failure (RCA Submitted)**
12/13/2022 2:52	**12/13/2022 9:44**	**6.87**	**Air Compressor Shutdown/ Flame Failure (RCA Submitted)**
12/13/2022 9:56	12/13/2022 10:16	0.33	Low Gas Flow due to construction activities (113)
12/13/2022 18:42	12/13/2022 18:48	0.10	Low Gas Flow due to construction activities (113)
12/14/2022 12:36	12/14/2022 12:44	0.13	Low Gas Flow due to construction activities (113)
12/31/2022 19:26	12/31/2022 19:32	0.10	Low Gas Flow due to construction activities (113)
1/3/2023 11:04	1/3/2023 11:26	0.37	Manual Shutdown for Flare Maintenance (113)
1/3/2023 16:08	1/3/2023 16:40	0.53	Manual Shutdown for Flare Maintenance (113)
1/26/2023 13:12	1/26/2023 14:02	0.83	Manual Shutdown for Flare Maintenance (113)
Total		**762.43**	

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 noted above. These events were considered reportable compliance activities (RCA) and breakdown relief was requested from BAAQMD. All subsequent reporting was completed within the required timeframes.
Per the Startup, Shutdown, and Malfunction (SSM) forms, a flare shutdown due to flame failure, temperature, or flow parameters are preventative parametric shutdowns as the flare cannot maintain the proper operating conditions to comply with the temperature/flow limits, so a preventative shutdown is activated to avoid non-compliance. Per BAAQMD 8-34-113 and the November 5, 2018 Compliance Advisory, a shutdown of air pollution control equipment prior to any non-compliance is allowable, given parametric indicators of the system (temperature or flow indicators) are predictive of a pending equipment failure and shutdown.

Table 1c. Flare (A-3) Downtime
Newby Island Landfill, Milpitas, California
(August 1, 2022 through January 31, 2023)

Shutdown	Startup	Downtime Hours	Reason for Downtime and BAAQMD Exemption
8/3/2022 21:22	**8/3/2022 21:34**	**0.20**	**High Flow (RCA Submitted)**
8/4/2022 11:24	8/4/2022 11:44	0.33	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
8/5/2022 22:28	**8/5/2022 22:40**	**0.20**	**High Flow (RCA Submitted)**
8/6/2022 10:30	8/6/2022 10:42	0.20	Low Gas Flow due to construction activities (113)
8/7/2022 19:38	**8/7/2022 19:50**	**0.20**	**High Flow (RCA Submitted)**
8/8/2022 17:02	8/8/2022 17:54	0.87	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
8/10/2022 13:00	8/10/2022 14:08	1.13	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
8/10/2022 15:14	8/10/2022 16:10	0.93	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
8/12/2022 11:36	8/12/2022 12:36	1.00	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
8/12/2022 15:34	8/12/2022 15:48	0.23	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
8/16/2022 7:42	8/16/2022 9:46	2.07	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
8/16/2022 9:50	8/16/2022 9:56	0.10	Low Gas Flow due to construction activities (113)
8/16/2022 10:18	8/16/2022 10:24	0.10	Low Gas Flow due to construction activities (113)
8/20/2022 13:06	8/20/2022 14:04	0.97	Flare Maintenance and Troubleshooting (113)
8/20/2022 14:18	8/20/2022 14:24	0.10	Flare Maintenance and Troubleshooting (113)
8/23/2022 11:22	8/23/2022 15:48	4.43	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
8/24/2022 1:02	8/24/2022 1:12	0.17	Low Gas Flow due to construction activities (113)
8/28/2022 20:26	8/28/2022 20:38	0.20	Low Gas Flow due to construction activities (113)
8/31/2022 10:12	8/31/2022 10:24	0.20	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
8/31/2022 12:50	8/31/2022 13:02	0.20	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
8/31/2022 13:14	8/31/2022 13:20	0.10	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
8/31/2022 15:06	8/31/2022 15:16	0.17	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
9/2/2022 10:48	9/2/2022 10:58	0.17	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
9/5/2022 13:16	**9/5/2022 16:46**	**3.50**	**Blower VFD Tripped (RCA Submitted)**
9/6/2022 13:10	**9/6/2022 17:08**	**3.97**	**PG&E Outage (RCA Submitted)**
9/7/2022 11:26	9/7/2022 12:02	0.60	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
9/8/2022 11:44	9/8/2022 12:38	0.90	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
9/15/2022 5:04	**9/15/2022 7:20**	**2.27**	**Flame Failure (RCA Submitted)**
9/15/2022 8:52	9/15/2022 10:38	1.77	Air Combustion Blower Filter Cleaning (113)
9/16/2022 7:14	9/16/2022 8:04	0.83	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
9/16/2022 9:16	9/16/2022 10:06	0.83	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
9/16/2022 12:30	9/16/2022 12:36	0.10	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
9/17/2022 9:52	9/17/2022 10:00	0.13	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
9/18/2022 18:10	9/18/2022 18:16	0.10	Low Gas Flow due to construction activities (113)
9/19/2022 10:38	9/19/2022 10:46	0.13	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
9/20/2022 8:48	9/20/2022 8:56	0.13	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
9/20/2022 19:38	9/20/2022 19:44	0.10	Low Gas Flow due to construction activities (113)

Table 1c. Flare (A-3) Downtime
Newby Island Landfill, Milpitas, California
(August 1, 2022 through January 31, 2023)

Shutdown	Startup	Downtime Hours	Reason for Downtime and BAAQMD Exemption
9/23/2022 10:34	9/23/2022 12:24	1.83	Air Combustion Blower Filter Cleaning (113)
9/26/2022 9:20	9/26/2022 9:32	0.20	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
9/26/2022 9:48	9/26/2022 9:54	0.10	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
9/26/2022 18:26	9/26/2022 18:38	0.20	Low Gas Flow due to construction activities (113)
9/27/2022 8:30	9/27/2022 8:42	0.20	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
9/27/2022 14:16	9/27/2022 16:56	2.67	Air Combustion Blower Filter Cleaning (113)
9/27/2022 17:34	9/27/2022 18:30	0.93	Low Gas Flow due to construction activities (113)
9/28/2022 13:08	9/28/2022 14:20	1.20	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
10/3/2022 17:10	10/3/2022 17:22	0.20	Low Gas Flow due to construction activities (113)
10/4/2022 9:16	10/4/2022 9:28	0.20	Low Gas Flow due to construction activities (113)
10/5/2022 2:12	**10/5/2022 12:16**	**10.07**	**Air Compressor Failure (RCA Submitted for this event)**
10/5/2022 15:52	10/5/2022 15:58	0.10	Low Gas Flow due to construction activities (113)
10/7/2022 21:12	10/7/2022 21:24	0.20	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
10/9/2022 20:56	**10/9/2022 21:08**	**0.20**	**Liquids Surge in Field (RCA Submitted for this event)**
10/10/2022 10:52	10/10/2022 11:04	0.20	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
10/10/2022 12:12	10/10/2022 12:22	0.17	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
10/10/2022 13:08	10/10/2022 13:14	0.10	Low Gas Flow due to construction activities (113)
10/12/2022 22:20	10/12/2022 22:28	0.13	Low Gas Flow due to construction activities (113)
10/12/2022 1:08	10/12/2022 1:20	0.20	Low Gas Flow due to construction activities (113)
10/14/2022 14:18	10/14/2022 14:58	0.67	Low Gas Flow due to construction activities (113)
10/15/2022 22:38	10/15/2022 22:50	0.20	Low Gas Flow due to construction activities (113)
10/19/2022 14:46	**10/19/2022 16:06**	**1.33**	**High Separator Alarm Shutdown (RCA Submitted for this event)**
10/21/2022 19:52	10/21/2022 20:00	0.13	Low Gas Flow due to construction activities (113)
10/25/2022 8:52	10/25/2022 9:04	0.20	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
10/31/2022 9:32	10/31/2022 10:14	0.70	Low Gas Flow due to construction activities (113)
11/1/2022 13:44	11/1/2022 13:56	0.20	Low Gas Flow due to construction activities (113)
11/2/2022 6:12	11/2/2022 16:36	10.40	Manual Shutdown for Flare Maintenance (113)
11/3/2022 10:08	11/3/2022 12:02	1.90	Low Gas Flow due to construction activities (113)
11/8/2022 2:14	11/8/2022 2:26	0.20	Low Gas Flow due to construction activities (113)
11/11/2022 8:56	11/11/2022 12:40	3.73	Manual Shutdown for Scheduled Construction Header Tie-In (113)
11/14/2022 14:00	11/14/2022 14:40	0.67	Low Gas Flow due to construction activities (113)
11/17/2022 11:40	11/17/2022 12:34	0.90	Low Gas Flow due to construction activities (113)
11/29/2022 15:20	11/29/2022 15:26	0.10	Low Gas Flow due to construction activities (113)

Table 1c. Flare (A-3) Downtime
Newby Island Landfill, Milpitas, California
(August 1, 2022 through January 31, 2023)

Shutdown	Startup	Downtime Hours	Reason for Downtime and BAAQMD Exemption
12/1/2022 17:26	**12/2/2022 9:24**	**15.97**	**PG&E Outage (RCA Submitted)**
12/2/2022 10:04	12/2/2022 12:20	2.27	Air Combustion Blower Filter Cleaning (113)
12/10/2022 16:52	12/10/2022 16:56	0.07	Flare Maintenance and Troubleshooting (113)
12/10/2022 17:22	**12/11/2022 11:36**	**18.23**	**Air Compressor Shutdown/Flame Failure (RCA Submitted)**
12/11/2022 16:06	**12/11/2022 16:40**	**0.57**	**Air Compressor Shutdown/Flame Failure (RCA Submitted)**
12/11/2022 17:02	**12/11/2022 17:34**	**0.53**	**Air Compressor Shutdown/Flame Failure (RCA Submitted)**
12/11/2022 22:12	**12/12/2022 11:34**	**13.37**	**Air Compressor Shutdown/Flame Failure (RCA Submitted)**
12/12/2022 16:28	**12/13/2022 10:30**	**18.03**	**Air Compressor Shutdown/Flame Failure (RCA Submitted)**
12/13/2022 12:20	**12/13/2022 12:50**	**0.50**	**Air Compressor Shutdown/Flame Failure (RCA Submitted)**
12/13/2022 18:42	12/14/2022 7:46	13.07	Manual shutdown for Air Compressor Troubleshooting (113)
12/14/2022 7:54	12/14/2022 8:00	0.10	Low Gas Flow due to construction activities (113)
12/14/2022 12:36	12/15/2022 15:04	26.47	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
12/15/2022 15:22	12/15/2022 15:28	0.10	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
12/21/2022 9:50	12/21/2022 10:00	0.17	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
12/21/2022 13:30	12/21/2022 13:50	0.33	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
12/31/2022 19:24	1/1/2023 7:40	12.27	Low Gas Flow due to construction activities (113)
1/1/2023 12:28	1/2/2023 12:34	24.10	Low Gas Flow due to construction activities (113)
1/2/2023 14:56	1/3/2023 8:48	17.87	Low Gas Flow due to construction activities (113)
1/3/2023 8:56	1/3/2023 9:32	0.60	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
1/3/2023 9:40	1/3/2023 10:28	0.80	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
1/3/2023 10:36	1/3/2023 10:58	0.37	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
1/3/2023 11:04	1/3/2023 11:24	0.33	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
1/3/2023 11:32	1/3/2023 11:40	0.13	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
1/3/2023 11:50	1/4/2023 10:08	22.30	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
1/13/2023 9:56	1/13/2023 10:08	0.20	Low Gas Flow due to construction activities (113)
1/24/2023 14:18	1/24/2023 15:14	0.93	Air Combustion Blower Filter Cleaning (113)
1/26/2023 13:12	1/26/2023 15:28	2.27	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
Total		**262.00**	

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 noted above. These events were considered reportable compliance activities (RCA) and breakdown relief was requested from BAAQMD. All subsequent reporting was completed within the required timeframes.
Per the Startup, Shutdown, and Malfunction (SSM) forms, a flare shutdown due to flame failure, temperature, or flow parameters are preventative parametric shutdowns as the flare cannot maintain the proper operating conditions to comply with the temperature/flow limits, so a preventative shutdown is activated to avoid non-compliance. Per BAAQMD 8-34-113 and the November 5, 2018 Compliance Advisory, a shutdown of air pollution control equipment prior to any non-compliance is allowable, given parametric indicators of the system (temperature or flow indicators) are predictive of a pending equipment failure and shutdown.

Table 2. Individual Well Startups, Shutdowns and Decommissions
Newby Island Landfill, Milpitas, California
(August 1, 2022 through January 31, 2023)

Well ID	Shutdown	Start-up	Days Offline	Reason for Shutdown/Startup
NILEW741*	7/14/2021		566	Well Temporarily Offline Due to Filling (actively offline)
NILEW733*	11/3/2021		454	Well Temporarily Offline due to Construction Activities (actively offline)
NILEW465*	11/3/2021		454	Well Temporarily Offline due to Construction Activities (actively offline)
NILEW674*	11/3/2021		454	Well Temporarily Offline due to Construction Activities (actively offline)
NILEW744*	11/3/2021		454	Well Temporarily Offline due to Construction Activities (actively offline)
NILEW745*	11/3/2021		454	Well Temporarily Offline due to Construction Activities (actively offline)
NILEW066*	11/11/2021		446	Well Temporarily Offline due to Construction Activities (actively offline)
NILEW499*	3/11/2022		327	Well Temporarily Offline due to Construction Activities (actively offline)
NILEW501*	3/11/2022		327	Well Temporarily Offline due to Construction Activities (actively offline)
NILEW511	3/11/2022	10/6/2022	209	Well Temporarily Offline due to Construction Activities
NILEW667*	3/11/2022		327	Well Temporarily Offline due to Construction Activities (actively offline)
NILEW688*	3/11/2022		327	Well Temporarily Offline due to Construction Activities (actively offline)
NILEW691*	3/11/2022		327	Well Temporarily Offline due to Construction Activities (actively offline)
NILMW017*	3/11/2022		327	Well Temporarily Offline due to Construction Activities (actively offline)
NILMW019	3/11/2022	11/16/2022	251	Well Temporarily Offline due to Construction Activities (actively offline)
NILMW020*	3/11/2022		327	Well Temporarily Offline due to Construction Activities (actively offline)
NILMW021*	3/11/2022		327	Well Temporarily Offline due to Construction Activities (actively offline)
NILEW476	4/26/2022	10/6/2022	163	Well Temporarily Offline due to Construction Activities
NILEW786	4/26/2022	10/6/2022	163	Well Temporarily Offline due to Construction Activities
NILEW725*	4/28/2022		279	Well Temporarily Offline due to Construction Activities (actively offline)
NIL3EW31	5/5/2022	10/11/2022	159	Well Temporarily Offline due to Construction Activities
NILEW479	5/5/2022	10/6/2022	154	Well Temporarily Offline due to Construction Activities
NILEW690	5/5/2022	10/6/2022	154	Well Temporarily Offline due to Construction Activities
NILEW787*	5/11/2022		266	Well Temporarily Offline due to Construction Activities (actively offline)
NILEW752	5/23/2022	10/6/2022	136	Well Temporarily Offline due to Construction Activities
NILEW483*	6/1/2022		245	Well Temporarily Offline due to Construction Activities (actively offline)
NILEW110*	6/23/2022		222	Well Temporarily Offline due to Construction Activities (actively offline)
NILEW480	7/7/2022	11/16/2022	132	Well Temporarily Offline due to Construction Activities
NILEW512	7/7/2022	11/16/2022	132	Well Temporarily Offline due to Construction Activities
NILEW00E	7/15/2022	11/16/2022	124	Well Temporarily Offline due to Construction Activities
NILMW023*	7/15/2022		201	Well Temporarily Offline due to Construction Activities (actively offline)
NILMW024*	7/15/2022		201	Well Temporarily Offline due to Construction Activities (actively offline)
NILEW687	8/3/2022	N/A	N/A	Well abandoned
NILEW726	8/3/2022	N/A	N/A	Well abandoned
NILMW025	8/12/2022	11/16/2022	96	Well Temporarily Offline due to Construction Activities
NILEW735	8/15/2022	11/16/2022	93	Well Temporarily Offline due to Construction Activities
NILEW753	8/15/2022	11/16/2022	93	Well Temporarily Offline due to Construction Activities
NLCRST05*	8/26/2022		159	Well Temporarily Offline due to Construction Activities (actively offline)
NILHC207*	8/26/2022		158	Well Temporarily Offline due to Construction Activities (actively offline)
NILFC005	10/24/2022	N/A	N/A	New well Start-up

Table 2. Individual Well Startups, Shutdowns and Decommissions
Newby Island Landfill, Milpitas, California
(August 1, 2022 through January 31, 2023)

Well ID	Shutdown	Start-up	Days Offline	Reason for Shutdown/Startup
NILFC006	10/24/2022	N/A	N/A	New well Start-up
NILFC007	10/24/2022	N/A	N/A	New well Start-up
NILEW596	12/14/2022	12/16/2022	2	Well Temporarily Offline due to Potential Subsurface Oxidation (SSO) Event Mitigation
NILEW597	12/14/2022	12/19/2022	5	Well Temporarily Offline due to Potential SSO Event Mitigation
NILEW708	12/14/2022	12/17/2022	3	Well Temporarily Offline due to Potential SSO Event Mitigation
NILEW750	12/14/2022	12/19/2022	5	Well Temporarily Offline due to Potential SSO Event Mitigation
NILEW601	12/14/2022	12/16/2022	2	Well Temporarily Offline due to Potential SSO Event Mitigation
NILEW748	12/14/2022	12/16/2022	2	Well Temporarily Offline due to Potential SSO Event Mitigation
NILHC201	12/14/2022	12/27/2022	13	Well Temporarily Offline due to Pipeline Repairs
NILHC201	12/14/2022	12/19/2022	5	Well Temporarily Offline due to Potential SSO Event Mitigation
NILEW663	12/14/2022	12/19/2022	5	Well Temporarily Offline due to Potential SSO Event Mitigation
NILEW663	12/14/2022	1/7/2023	24	Well Temporarily Offline due to Pipeline Repairs
NILEW615	12/14/2022	12/16/2022	2	Well Temporarily Offline due to Potential SSO Event Mitigation
NILEW615	12/14/2022	1/7/2023	24	Well Temporarily Offline due to Pipeline Repairs
NILEW706	12/15/2022	12/19/2022	4	Well Temporarily Offline due to Potential SSO Event Mitigation
NILEW496	12/15/2022	12/17/2022	2	Well Temporarily Offline due to Potential SSO Event Mitigation
NILEW707	12/15/2022	12/19/2022	4	Well Temporarily Offline due to Potential SSO Event Mitigation
NILEW669	1/12/2023	N/A	N/A	Well abandoned
NIBC-17A	1/16/2023	N/A	N/A	Well abandoned
NILEW802	1/18/2023	N/A	N/A	Well abandoned

*Well was offline at the end of the reporting period. For reporting purposes, the startup time is calculated as of February 1, 2023 at 00:00.

Note: Wells offline in active construction areas were included in Combined Request for Limited Exemption and Rule 118 Construction Plan submittals to BAAQMD. Due to unforeseen circumstances during construction project duration, significant infrastructure issues have prevented wells from being returned online. Site and O&M personnel are coordinating with third party on a resolution to reestablish vacuum to the area and reconnect the remaining offline wells to the GCCS.

Table 3. Wells with Positive Pressure
Newby Island Landfill, Milpitas, California
(August 1, 2022 through January 31, 2023)

Well ID	Date and Time	Initial Static Pressure ("H_2O)	Adjusted Static Pressure ("H_2O)	Comments	Corrective Action
NILEW00E	11/16/2022 15:31	2.46	-0.10	Valve Adjustment:Opened valve >10%,Valve 30% open	N/A
NIL3EW31	10/11/2022 16:05	14.66	-0.11	Valve Adjustment:Opened valve >10%,Valve 30% open	N/A
NILEW476	10/6/2022 13:28	16.28	12.22	Initial reading,Opened well	N/A
NILEW476	10/6/2022 13:29	3.02	3.63	Follow up reading,No Change	
NILEW476	10/7/2022 15:30	-9.93	-9.93	Initial reading,No Change	
NILEW476	11/22/2022 13:16	14.92	-0.22	Valve Adjustment:NSPS/CAI,Opened valve 10% or less,Valve 30% open	N/A
NILEW476	12/10/2022 9:13	1.28	-1.33	Initial reading,Opened well	N/A
NILEW479	10/6/2022 13:25	11.33	10.63	Initial reading,Opened well	N/A
NILEW479	10/6/2022 13:26	9.95	9.96	Follow up reading,No Change	
NILEW479	10/7/2022 15:52	2.39	0.31	Initial reading,Opened well	
NILEW479	10/7/2022 15:54	-1.29	-1.30	Follow up reading,No Change	
NILEW496	10/12/2022 14:12	9.03	-1.15	Valve Adjustment:NSPS/CAI,Opened valve 10% or less,Valve 5% open	N/A
NILEW496	12/15/2022 16:30	39.55	39.66	Valve Adjustment:Valve at minimum position	N/A
NILEW496	12/16/2022 18:46	41.11	40.95	Valve Adjustment:No change,Valve at minimum position	
NILEW496	12/17/2022 13:18	0.52	0.54	Valve Adjustment:No change,Valve at minimum position	
NILEW496	12/18/2022 13:10	53.33	53.35	Initial reading,No Change	
NILEW496	12/19/2022 14:57	46.79	42.81	Valve Adjustment:Valve at minimum position,Opened valve 10% or less;Well Comment:Gas flow present	
NILEW496	12/19/2022 14:58	40.56	40.54	Valve Adjustment:No change,Valve at minimum position;Well Comment:Gas flow present	
NILEW496	12/20/2022 12:00	46.44	42.51	Valve Adjustment:Valve at minimum position,Opened valve 10% or less;Well Comment:Gas flow present	
NILEW496	12/20/2022 12:01	40.68	40.68	Valve Adjustment:No change,Valve at minimum position	
NILEW496	12/21/2022 12:09	30.67	26.54	Valve Adjustment:Valve at minimum position,Opened valve 10% or less;Well Comment:Gas flow present	
NILEW496	12/21/2022 12:10	20.97	20.97	Valve Adjustment:No change,Valve at minimum position	
NILEW496	12/22/2022 16:40	-0.96	-0.81	Valve Adjustment:No change,Valve at minimum position	
NILEW511	10/6/2022 13:10	15.14	15.12	Initial reading,No Change	N/A
NILEW511	10/6/2022 13:12	12.50	12.48	Follow up reading,No Change	
NILEW511	10/7/2022 16:00	-8.68	-10.00	Initial reading,Opened well	
NILEW511	1/19/2023 14:29	7.09	-4.07	Initial reading,Opened well	N/A
NILEW596	12/14/2022 15:38	9.54	11.14	Valve Adjustment:Valve at minimum position	N/A
NILEW596	12/14/2022 15:39	12.20	12.20	Valve Adjustment:Valve at minimum position	
NILEW596	12/15/2022 15:50	7.80	7.80	Valve Adjustment:No change,Valve at minimum position	
NILEW596	12/16/2022 17:03	8.09	7.30	Valve Adjustment:Opened valve 10% or less;Well Comment:Gas flow present	
NILEW596	12/16/2022 17:05	7.31	7.31	Valve Adjustment:No change;Well Comment:Gas flow present	
NILEW597	12/29/2022 15:09	0.49	-0.19	Valve Adjustment:Opened valve 10% or less,Valve 5% open	
NILEW601	12/14/2022 15:58	18.42	21.62	Valve Adjustment:Valve at minimum position,Closed valve >10%	N/A
NILEW601	12/14/2022 15:58	39.34	40.21	Valve Adjustment:Valve at minimum position	
NILEW601	12/15/2022 16:06	59.83	59.83	Valve Adjustment:No change	
NILEW601	12/16/2022 17:26	44.49	40.60	Valve Adjustment:Opened valve 10% or less,Valve 10% open;Well Comment:Gas flow present	
NILEW601	12/16/2022 18:06	28.09	28.14		
NILEW601	12/17/2022 12:22	6.97	38.94	Valve Adjustment:Closed valve 10% or less,Valve 5% open;Well Comment:Gas flow present	N/A
NILEW601	12/17/2022 12:23	38.73	38.73	Valve Adjustment:No change,Valve 5% open	
NILEW601	12/17/2022 14:12	38.91	38.90	Valve Adjustment:No change,Valve 5% open	
NILEW601	12/18/2022 12:16	16.00	16.02	Initial reading,No Change	
NILEW601	12/19/2022 14:30	17.58	16.47	Valve Adjustment:Opened valve 10% or less,Valve 5% open	
NILEW601	12/19/2022 14:33	15.31	15.29	Valve Adjustment:No change,Valve 5% open	
NILEW601	12/20/2022 11:03	18.31	16.27	Valve Adjustment:Opened valve 10% or less,Valve 5% open;Well Comment:Gas flow present	
NILEW601	12/20/2022 11:05	16.17	16.26	Valve Adjustment:No change,Valve 5% open	
NILEW601	12/21/2022 11:12	6.06	4.85	Valve Adjustment:Opened valve 10% or less,Valve 5% open;Well Comment:Gas flow present	
NILEW601	12/21/2022 11:16	0.75	0.66	Valve Adjustment:No change,Valve 5% open	
NILEW601	12/22/2022 15:45	-2.46	-2.54	Valve Adjustment:No change,Valve 5% open	
NILEW601	12/29/2022 14:55	0.61	-0.14	Valve Adjustment:Valve at minimum position,Opened valve 10% or less	N/A
NILEW620	10/26/2022 11:50	0.11	0.13	Valve Adjustment:NSPS/CAI,Valve 100% open	RCA, CAA, 75-day
NILEW620	10/26/2022 11:51	0.20	0.28	Valve Adjustment:NSPS/CAI,Valve 100% open	
NILEW620	11/9/2022 14:32	11.53	11.86	Valve Adjustment:NSPS/CAI	
NILEW620	11/21/2022 15:55	2.24	2.33	Initial reading,	
NILEW620	12/10/2022 11:59	3.30	3.37	Initial reading,No Change,Ongoing exceedance	
NILEW620	12/28/2022 15:55	2.30	2.55	Valve Adjustment:NSPS/CAI	
NILEW620	1/7/2023 12:45	1.67	1.67	Valve Adjustment:NSPS/CAI	
NILEW620*	1/25/2023 14:50	2.13	2.15	Valve Adjustment:NSPS/CAI	
NILEW633	12/6/2022 13:00	4.63	-1.48	Valve Adjustment:NSPS/CAI,Opened valve 10% or less,Valve 30% open	N/A
NILEW639	1/4/2023 12:29	2.33	-0.20	Valve Adjustment:NSPS/CAI,Opened valve 10% or less,Valve 5% open	N/A
NILEW641	10/17/2022 15:31	0.01	-5.30	Initial reading,Opened well	N/A
NILEW644	9/7/2022 11:38	2.87	-1.08	Valve Adjustment:NSPS/CAI,Opened valve 10% or less,Valve 5% open	N/A
NILEW644	9/27/2022 12:08	0.75	-0.53	Valve Adjustment:NSPS/CAI,Opened valve 10% or less,Valve 10% open	N/A
NILEW650	8/19/2022 15:06	0.01	-0.95	Initial reading,Opened well	N/A
NILEW650	12/14/2022 11:26	1.71	2.44	Valve Adjustment:NSPS/CAI	N/A
NILEW650	12/14/2022 11:27	0.90	0.92	Valve Adjustment:NSPS/CAI	

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Newby Island Landfill, Milpitas, California
(August 1, 2022 through January 31, 2023)

Well ID	Date and Time	Initial Static Pressure ("H_2O)	Adjusted Static Pressure ("H_2O)	Comments	Corrective Action
NILEW650	12/28/2022 16:06	-43.62	-43.87	Valve Adjustment:No change,Valve 100% open	
NILEW652	12/14/2022 11:20	3.73	4.03	Valve Adjustment:NSPS/CAI,Opened valve 10% or less	N/A
NILEW652	12/14/2022 11:21	1.06	1.39	Valve Adjustment:NSPS/CAI	
NILEW652	12/28/2022 16:14	-41.94	-23.03	Valve Adjustment:Valve at minimum position	
NILEW690	10/6/2022 13:22	5.08	5.09	Initial reading,Opened well	N/A
NILEW690	10/6/2022 13:23	2.60	2.10	Follow up reading,No Change	
NILEW690	10/7/2022 15:43	-35.44	-35.44	Initial reading,No Change	
NILEW703	10/3/2022 14:58	9.17	-0.87	Initial reading,Opened well	N/A
NILEW704	9/12/2022 16:11	0.13	-0.01	Initial reading,Opened well	N/A
NILEW704	9/30/2022 13:37	0.06	-0.16	Valve Adjustment:NSPS/CAI,Opened valve 10% or less,Valve 25% open	N/A
NILEW705	1/12/2023 14:26	2.31	2.54	Initial reading,No Change,Lateral Vacuum loss	N/A
NILEW705	1/12/2023 14:29	2.28	2.80	Follow up reading,No Change	
NILEW705	1/26/2023 17:05	-65.05	-63.65	Initial reading,No Change,Valve at minimum position	
NILEW706	12/15/2022 11:42	9.83	9.85	Valve Adjustment:Valve at minimum position	N/A
NILEW706	12/16/2022 19:32	10.99	11.21	Valve Adjustment:No change,Valve at minimum position	
NILEW706	12/17/2022 13:01	10.82	10.93	Valve Adjustment:No change,Valve at minimum position	
NILEW706	12/18/2022 13:01	9.00	9.01	Initial reading,No Change	
NILEW706	12/19/2022 12:33	9.94	9.99	Valve Adjustment:No change,Valve at minimum position	
NILEW706	12/20/2022 11:45	8.14	7.29	Valve Adjustment:Valve at minimum position,Opened valve 10% or less;Well Comment:gas flow present	
NILEW706	12/20/2022 11:46	5.78	5.76	Valve Adjustment:No change,Valve at minimum position	
NILEW706	12/21/2022 11:51	3.16	2.90	Valve Adjustment:Valve at minimum position,Opened valve 10% or less;Well Comment:Gas flow present	
NILEW706	12/21/2022 11:53	1.87	1.83	Valve Adjustment:No change,Valve at minimum position	
NILEW706	12/22/2022 16:25	-1.95	-1.93	Valve Adjustment:No change,Valve at minimum position	
NILEW707	12/15/2022 16:49	0.46	0.39	Valve Adjustment:Valve at minimum position	N/A
NILEW707	12/16/2022 18:55	10.89	10.89	Valve Adjustment:No change,Valve at minimum position	
NILEW707	12/17/2022 13:24	13.24	13.26	Valve Adjustment:No change,Valve at minimum position	
NILEW707	12/18/2022 13:18	14.41	14.42	Initial reading,No Change	
NILEW707	12/19/2022 11:55	12.35	12.52	Valve Adjustment:Valve at minimum position	
NILEW707	12/20/2022 12:06	13.09	12.20	Valve Adjustment:Valve at minimum position,Opened valve 10% or less;Well Comment:Gas flow present	
NILEW707	12/20/2022 12:07	12.54	12.54	Valve Adjustment:No change,Valve at minimum position	
NILEW707	12/21/2022 12:12	14.75	12.90	Valve Adjustment:Valve at minimum position,Opened valve 10% or less;Well Comment:Gas flow present	
NILEW707	12/21/2022 12:13	12.44	12.47	Valve Adjustment:No change,Valve at minimum position	
NILEW707	12/22/2022 16:45	7.30	4.52	Valve Adjustment:Valve at minimum position,Opened valve 10% or less;Well Comment:Gas flow present	
NILEW707	12/22/2022 16:46	3.72	3.78	Valve Adjustment:No change,Valve at minimum position	
NILEW707	12/23/2022 17:22	-8.14	-8.14	Valve Adjustment:No change,Valve at minimum position	
NILEW708	12/14/2022 15:48	8.16	25.93	Valve Adjustment:Valve at minimum position,Closed valve >10%	N/A
NILEW708	12/14/2022 15:49	46.09	45.85	Valve Adjustment:Valve at minimum position	
NILEW708	12/15/2022 16:13	16.95	16.61	Valve Adjustment:No change,Valve at minimum position	
NILEW708	12/16/2022 17:54	7.84	7.12	Valve Adjustment:No change	
NILEW708	12/17/2022 12:42	4.69	4.69	Valve Adjustment:No change,Valve 5% open	
NILEW708	12/18/2022 12:37	8.93	8.92	Initial reading,No Change	
NILEW708	12/19/2022 14:44	5.26	4.76	Valve Adjustment:Opened valve 10% or less,Valve 5% open;Well Comment:Gas flow present	
NILEW708	12/19/2022 14:48	4.16	4.85	Valve Adjustment:No change,Valve 5% open;Well Comment:Gas flow present	
NILEW708	12/20/2022 11:17	5.97	4.64	Valve Adjustment:Opened valve 10% or less,Valve 5% open;Well Comment:Gas flow present	
NILEW708	12/20/2022 11:20	4.09	4.13	Valve Adjustment:No change,Valve 5% open	
NILEW708	12/21/2022 11:23	7.51	6.19	Valve Adjustment:Opened valve 10% or less,Valve 5% open;Well Comment:Gas flow present	
NILEW708	12/21/2022 11:31	4.75	5.08	Valve Adjustment:No change,Valve 5% open;Well Comment:Gas flow present	
NILEW708	12/22/2022 15:54	2.44	-0.19	Valve Adjustment:Opened valve 10% or less,Valve 5% open;Well Comment:Gas flow present	
NILEW712	8/12/2022 13:21	0.11	-0.74	Initial reading,Opened well	N/A
NILEW712	12/10/2022 10:55	1.87	-0.74	Initial reading,Opened well	N/A
NILEW715	8/18/2022 16:19	17.10	-0.13	Initial reading,Opened well	N/A
NILEW740	12/29/2022 13:55	0.63	0.79	Initial reading,Closed well,Lateral Vacuum loss	RCA
NILEW740	12/29/2022 14:03	0.60	0.62	Follow up reading,No Change,Well offline (valve 100% closed)	
NILEW740	1/13/2023 14:46	3.60	3.60	Initial reading,No Change,Lateral Vacuum loss	
NILEW740	1/31/2023 14:33	-0.10	-0.16	Valve Adjustment:No change,Valve 10% open	
NILEW748	12/14/2022 16:02	7.46	13.45	Valve Adjustment:Valve at minimum position,Closed valve >10%	N/A
NILEW748	12/14/2022 16:03	22.15	22.67	Valve Adjustment:Valve at minimum position	
NILEW748	12/15/2022 16:09	76.02	76.06	Valve Adjustment:Valve at minimum position	
NILEW748	12/16/2022 17:20	63.31	57.97	Valve Adjustment:Opened valve 10% or less,Valve 20% open;Well Comment:Gas flow present	
NILEW748	12/16/2022 17:22	57.61	57.54	Valve Adjustment:No change,Valve 20% open;Well Comment:Gas flow present	
NILEW748	12/17/2022 12:10	32.54	29.58	Valve Adjustment:Opened valve 10% or less,Valve 30% open	
NILEW748	12/17/2022 12:11	29.39	29.39	Valve Adjustment:No change,Valve 30% open	
NILEW748	12/17/2022 14:08	23.14	29.04	Valve Adjustment:Closed valve 10% or less,Valve 25% open	
NILEW748	12/17/2022 14:09	29.06	29.08	Valve Adjustment:No change,Valve 25% open	
NILEW748	12/18/2022 12:05	38.98	38.99	Initial reading,No Change	
NILEW748	12/19/2022 12:18	35.13	32.84	Valve Adjustment:Opened valve 10% or less,Valve 25% open;Well Comment:Gas flow present	
NILEW748	12/19/2022 12:19	32.48	32.50	Valve Adjustment:No change,Valve 25% open;Well Comment:Gas flow present	
NILEW748	12/20/2022 10:57	20.00	18.14	Valve Adjustment:Opened valve 10% or less,Valve 30% open;Well Comment:gas flow present	
NILEW748	12/20/2022 10:59	17.96	17.97	Valve Adjustment:No change,Valve 30% open	
NILEW748	12/21/2022 11:06	14.92	13.93	Valve Adjustment:Opened valve 10% or less,Valve 30% open;Well Comment:Gas flow present	
NILEW748	12/21/2022 11:07	13.33	13.39	Valve Adjustment:No change,Valve 30% open	
NILEW748	12/22/2022 15:40	8.09	6.79	Valve Adjustment:Opened valve 10% or less,Valve 30% open;Well Comment:Gas flow present	

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Newby Island Landfill, Milpitas, California
(August 1, 2022 through January 31, 2023)

Well ID	Date and Time	Initial Static Pressure ("H_2O)	Adjusted Static Pressure ("H_2O)	Comments	Corrective Action
NILEW748	12/22/2022 15:41	5.42	5.42	Valve Adjustment:No change,Valve 30% open	
NILEW748	12/23/2022 16:49	-5.15	-3.62	Valve Adjustment:Closed valve 10% or less,Valve 30% open	
NILEW748	1/6/2023 15:29	3.06	-0.14	Valve Adjustment:Opened valve 10% or less,Valve 40% open	N/A
NILEW750	12/14/2022 15:52	13.26	27.03	Valve Adjustment:Valve at minimum position,Closed valve >10%	N/A
NILEW750	12/14/2022 15:53	66.25	66.44	Valve Adjustment:Valve at minimum position	
NILEW750	12/15/2022 16:03	12.20	12.37	Valve Adjustment:No change,Valve at minimum position	
NILEW750	12/16/2022 18:00	43.05	43.39	Valve Adjustment:No change	
NILEW750	12/17/2022 12:28	54.62	49.24	Valve Adjustment:Opened valve 10% or less,Valve 5% open;Well Comment:Gas flow present	
NILEW750	12/17/2022 12:34	49.12	49.28	Valve Adjustment:No change,Valve 5% open	
NILEW750	12/17/2022 14:16	38.70	49.04	Valve Adjustment:Valve at minimum position,Closed valve 10% or less	
NILEW750	12/17/2022 14:18	49.34	49.36	Valve Adjustment:No change,Valve at minimum position	
NILEW750	12/18/2022 12:26	23.22	23.22	Initial reading,No Change	
NILEW750	12/19/2022 14:38	21.65	19.81	Valve Adjustment:Opened valve 10% or less,Valve 5% open	
NILEW750	12/19/2022 14:40	19.08	19.32	Valve Comment:Gas flow t;Valve Adjustment:No change,Valve 5% open	
NILEW750	12/20/2022 11:09	11.11	10.24	Valve Adjustment:Opened valve 10% or less,Valve 5% open;Well Comment:Gas flow present	
NILEW750	12/20/2022 11:12	10.19	10.24	Valve Adjustment:No change,Valve 5% open	
NILEW750	12/21/2022 11:20	-10.42	-10.45	Valve Adjustment:No change,Valve at minimum position	
NILEW752	10/6/2022 13:33	56.51	3.55	Initial reading,Opened well	N/A
NILEW752	10/6/2022 13:37	1.82	1.87	Follow up reading,No Change	
NILEW752	10/7/2022 15:23	-0.39	-0.39	Initial reading,No Change	
NILEW752	11/7/2022 12:06	6.58	-2.24	Initial reading,Opened well	N/A
NILEW753	11/16/2022 15:14	1.70	-0.12	Valve Adjustment:Opened valve >10%,Valve 15% open	N/A
NILEW759	1/21/2023 10:23	67.78	6.92	Initial reading,Closed well,Pump Needs Maintenance	N/A
NILEW759*	1/21/2023 10:26	2.23	2.63	Follow up reading,No Change	
NILEW760	10/6/2022 11:51	0.02	-0.05	Initial reading,Opened well	N/A
NILEW760	10/26/2022 12:51	0.09	-0.15	Valve Adjustment:NSPS/CAI,Opened valve 10% or less,Valve 25% open	N/A
NILEW761	11/18/2022 11:28	0.72	-0.99	Initial reading,Opened well	N/A
NILEW762	11/28/2022 13:35	1.41	1.40	Valve Adjustment:No change,Valve 40% open	N/A
NILEW762	12/6/2022 15:26	-0.14	-0.18	Valve Adjustment:No change,Valve 40% open	
NILEW768	11/7/2022 12:42	0.23	-0.39	Initial reading,Opened well	N/A
NILEW768	12/10/2022 10:28	0.07	-0.60	Initial reading,Opened well	N/A
NILEW768	1/6/2023 13:39	0.16	-0.44	Initial reading,Opened well	N/A
NILEW775	12/15/2022 15:50	5.50	-1.10	Initial reading,Opened well	N/A
NILEW786	1/12/2023 15:02	1.05	-0.04	Initial reading,Opened well	N/A
NILEW788	10/3/2022 14:17	0.48	-0.07	Initial reading,Opened well	N/A
NILEW799	12/7/2022 12:09	0.36	-1.21	Valve Adjustment:NSPS/CAI,Opened valve 10% or less,Valve 30% open	N/A
NILEW799	12/28/2022 14:46	0.05	-2.04	Valve Adjustment:NSPS/CAI,Opened valve 10% or less,Valve 35% open	N/A
NILEW803	10/12/2022 12:52	0.74	0.73	Valve Adjustment:NSPS/CAI,Valve 30% open	RCA, CAA, 75-day
NILEW803	10/12/2022 12:53	0.72	0.73	Valve Adjustment:NSPS/CAI	
NILEW803	10/26/2022 11:45	0.85	0.85	Valve Adjustment:NSPS/CAI,Valve 30% open	
NILEW803	11/9/2022 14:27	3.59	3.59	Valve Adjustment:NSPS/CAI	
NILEW803	11/16/2022 14:22	1.64	1.70	Valve Adjustment:NSPS/CAI	
NILEW803	12/7/2022 12:50	1.53	1.55	Valve Adjustment:NSPS/CAI	
NILEW803	12/28/2022 15:42	1.20	1.27	Valve Adjustment:NSPS/CAI	
NILEW803	1/7/2023 12:30	0.65	0.82	Valve Adjustment:NSPS/CAI	
NILEW803*	1/25/2023 14:47	1.98	1.98	Valve Adjustment:NSPS/CAI	
NILEW804	8/19/2022 14:21	0.95	-0.56	Initial reading,Opened well	N/A
NILEW804	10/6/2022 13:47	3.00	-0.48	Initial reading,Opened well	N/A
NILEW805	11/21/2022 15:51	8.75	-8.46	Initial reading,Opened well	N/A
NILEW806	12/21/2022 14:57	0.07	-0.14	Valve Adjustment:NSPS/CAI,Opened valve 10% or less,Valve 10% open	N/A
NILCW002	10/6/2022 11:07	0.22	-0.01	Initial reading,Opened well	N/A
NILCW002	12/10/2022 10:17	0.01	-0.01	Initial reading,Opened well	N/A
NILCW003	10/6/2022 11:10	0.02	-0.02	Initial reading,Opened well	N/A
NILCW003	1/6/2023 13:47	0.02	-0.03	Initial reading,Opened well	N/A
NILCW004	8/30/2022 13:00	0.03	-0.10	Valve Adjustment:NSPS/CAI,Opened valve 10% or less,Valve 10% open	N/A
NIHC17-4	1/6/2023 13:23	0.75	-0.08	Initial reading,Opened well	N/A

Table 3. Wells with Positive Pressure
Newby Island Landfill, Milpitas, California
(August 1, 2022 through January 31, 2023)

Well ID	Date and Time	Initial Static Pressure ("H_2O)	Adjusted Static Pressure ("H_2O)	Comments	Corrective Action
NILHC247	11/3/2022 13:22	0.06	0.07	Initial reading,No Change,Valve 100% open	N/A
NILHC247	11/3/2022 13:24	0.07	0.08	Follow up reading,No Change	
NILHC247	11/16/2022 14:34	-0.75	-0.71	Valve Adjustment:No change,Valve 100% open	
NILMW031	9/12/2022 13:01	0.27	-1.32	Initial reading,Opened well	N/A
NILMW031	12/29/2022 15:46	0.19	-0.30	Initial reading,Opened well	N/A
NILMW032	9/12/2022 12:56	0.79	-0.30	Initial reading,Opened well	N/A
NILMW034	9/12/2022 12:43	0.06	-0.02	Initial reading,Opened well	N/A

Note: All required corrective action and remonitoring was completed in accordance with Rule 8-34 and NSPS timelines.
All pressure exceedance were corrected within 15 days except for the wells noted in ***bold italics*** . Root cause analysis forms were completed for these wells.
*Wells noted ***with an asterisk*** indicates wells remained in exceedance for pressure as of the end of the reporting period.

Table 4. Wells with Oxygen Exceedances
Newby Island Landfill, Milpitas, California
(August 1, 2022 through January 31, 2023)

Well ID	Date and Time	Oxygen (%)	Comments
NIL3EW31	11/7/2022 11:33	6.0	Initial reading,Closed well
NIL3EW31	11/7/2022 11:34	6.0	Follow up reading,No Change
NIL3EW31	11/17/2022 13:24	0.0	Initial reading,Opened well
NIL3EW31	12/10/2022 8:57	6.1	Initial reading,Closed well
NIL3EW31	12/10/2022 8:58	6.1	Follow up reading,No Change
NIL3EW31	12/23/2022 13:05	5.3	Initial reading,Closed well
NIL3EW31	12/23/2022 13:06	5.3	Follow up reading,No Change
NIL3EW31	1/10/2023 15:03	9.3	Valve Adjustment:NSPS/CAI,Closed valve 10% or less,Valve 10% open
NIL3EW31	1/10/2023 15:05	10.3	Valve Adjustment:NSPS/CAI,Valve 10% open
NIL3EW31	1/19/2023 13:05	14.9	Initial reading,Closed well
NIL3EW31*	1/19/2023 13:07	14.8	Follow up reading,No Change
NILEW438	12/10/2022 12:13	6.2	Initial reading,Closed well
NILEW438	12/10/2022 12:15	6.3	Follow up reading,No Change
NILEW438	12/21/2022 16:08	8.6	Valve Adjustment:NSPS/CAI,Valve at minimum position,Closed valve >1 turn
NILEW438	12/21/2022 16:10	4.9	Valve Adjustment:No change,Valve at minimum position
NILEW496	11/3/2022 14:39	10.8	Initial reading,Closed well,Valve at minimum position
NILEW496	11/3/2022 14:40	10.5	Follow up reading,No Change
NILEW496	11/16/2022 12:17	2.3	Valve Adjustment:No change,Valve at minimum position
NILEW511	12/10/2022 9:30	14.2	Initial reading,Closed well
NILEW511	12/10/2022 9:33	14.2	Follow up reading,No Change
NILEW511	12/23/2022 13:28	2.4	Initial reading,Closed well
NILEW514	10/7/2022 14:01	14.6	Initial reading,Closed well
NILEW514	10/7/2022 14:03	13.6	Follow up reading,No Change
NILEW514	10/19/2022 16:27	0.5	Valve Adjustment:No change,Valve 15% open
NILEW514	12/29/2022 13:54	14.2	No Change,
NILEW514	12/29/2022 14:08	7.1	Valve Adjustment:NSPS/CAI,Closed valve 10% or less,Valve 10% open
NILEW514	1/11/2023 16:02	4.7	Valve Adjustment:No change,Valve at minimum position
NILEW593	11/21/2022 13:33	12.9	Initial reading,Closed well
NILEW593	11/21/2022 13:34	12.6	Follow up reading,No Change
NILEW593	12/6/2022 13:57	3.5	Valve Adjustment:No change,Valve 30% open
NILEW595	1/17/2023 16:09	5.7	Valve Adjustment:NSPS/CAI,Closed valve >10%,Valve 25% open
NILEW595	1/17/2023 16:15	6.7	Valve Adjustment:NSPS/CAI
NILEW595	1/31/2023 13:34	0.9	Valve Adjustment:No change,Valve 25% open
NILEW644	8/18/2022 16:07	13.6	Initial reading,Closed well,Valve at minimum position
NILEW644	8/18/2022 16:10	10.0	Follow up reading,No Change
NILEW644	9/7/2022 11:38	0.7	Valve Adjustment:NSPS/CAI,Opened valve 10% or less,Valve 5% open
NILEW644	1/12/2023 15:55	12.1	Initial reading,Closed well
NILEW644	1/12/2023 15:58	11.3	Follow up reading,No Change
NILEW644*	1/16/2023 15:55	13.6	Initial reading,No Change,Valve at minimum position
NILEW650	8/11/2022 14:30	13.0	Initial reading,Closed well
NILEW650	8/11/2022 14:39	13.0	Follow up reading,No Change,Valve at minimum position
NILEW650	8/19/2022 15:06	0.0	Initial reading,Opened well
NILEW652	11/9/2022 16:12	5.7	Valve Adjustment:NSPS/CAI,Closed valve >10%
NILEW652	11/9/2022 16:19	5.7	Valve Adjustment:NSPS/CAI
NILEW652	11/21/2022 16:09	5.7	Initial reading,Closed well
NILEW652	11/21/2022 16:11	5.7	Follow up reading,No Change
NILEW652	12/14/2022 11:20	0.0	Valve Adjustment:NSPS/CAI,Opened valve 10% or less
NILEW652	12/28/2022 16:14	8.5	Valve Adjustment:Valve at minimum position
NILEW652	12/28/2022 16:16	6.8	Valve Adjustment:NSPS/CAI,Valve at minimum position
NILEW652	1/11/2023 15:22	6.5	Valve Adjustment:NSPS/CAI,Valve at minimum position
NILEW652	1/21/2023 9:26	0.4	Initial reading,No Change,Valve at minimum position
NILEW654	10/6/2022 12:30	8.8	Initial reading,Closed well
NILEW654	10/6/2022 12:32	9.6	Follow up reading,No Change
NILEW654	10/19/2022 16:22	0.1	Valve Adjustment:No change,Valve 15% open
NILEW654	11/9/2022 15:52	11.3	Valve Adjustment:NSPS/CAI
NILEW654	11/9/2022 15:58	21.7	Valve Adjustment:NSPS/CAI
NILEW654	11/21/2022 16:16	1.1	Initial reading,No Change,Valve 100% open
NILEW669	9/15/2022 13:03	20.0	Valve Adjustment:NSPS/CAI
NILEW669	9/15/2022 13:05	20.0	Valve Adjustment:NSPS/CAI
NILEW669	9/27/2022 14:07	17.9	Valve Adjustment:NSPS/CAI

Table 4. Wells with Oxygen Exceedances
Newby Island Landfill, Milpitas, California
(August 1, 2022 through January 31, 2023)

Well ID	Date and Time	Oxygen (%)	Comments
NILEW669	10/7/2022 13:47	15.8	Initial reading,No Change
NILEW669	10/26/2022 14:10	16.3	Valve Adjustment:NSPS/CAI,Valve 40% open
NILEW669	11/15/2022 12:05	15.7	Valve Adjustment:NSPS/CAI
NILEW669	11/21/2022 16:37	15.7	Initial reading,No Change
NILEW669	12/29/2022 14:23	16.5	Valve Adjustment:NSPS/CAI
NILEW669*	1/12/2023 16:39	10.5	Initial reading,No Change
NILEW675	1/17/2023 15:43	11.1	Valve Adjustment:NSPS/CAI,Valve at minimum position,Closed valve >10%
NILEW675	1/17/2023 15:44	10.8	Valve Adjustment:NSPS/CAI,Valve at minimum position
NILEW675	1/31/2023 13:40	4.0	Valve Adjustment:No change,Valve at minimum position
NILEW679	8/17/2022 11:01	15.5	Valve Adjustment:NSPS/CAI,Closed valve 10% or less,Valve 20% open
NILEW679	8/17/2022 11:03	13.0	Valve Adjustment:NSPS/CAI
NILEW679	8/29/2022 13:52	0.0	Valve Adjustment:Opened valve 10% or less,Valve 25% open
NILEW680	1/17/2023 14:08	8.1	Valve Adjustment:NSPS/CAI,Closed valve >10%,Valve 20% open
NILEW680	1/17/2023 14:10	9.0	Valve Adjustment:NSPS/CAI,Valve 20% open
NILEW680	1/31/2023 13:45	15.3	Valve Adjustment:NSPS/CAI,Valve at minimum position,Closed valve >10%
NILEW680*	1/31/2023 13:46	12.8	Valve Adjustment:NSPS/CAI,Valve at minimum position
NILEW704	1/5/2023 14:32	9.9	Initial reading,Closed well
NILEW704	1/5/2023 14:35	9.9	Follow up reading,No Change
NILEW704	1/18/2023 15:26	4.1	Valve Adjustment:No change,Valve 10% open
NILEW704	1/19/2023 12:46	5.6	Initial reading,Closed well
NILEW704	1/19/2023 12:58	5.6	Follow up reading,No Change
NILEW705	8/12/2022 11:44	0.0	Initial reading,No Change
NILEW705	1/26/2023 17:05	17.5	Initial reading,No Change,Valve at minimum position
NILEW705*	1/26/2023 17:10	17.4	Follow up reading,No Change
NILEW715	8/12/2022 13:11	12.3	Initial reading,Closed well,Valve at minimum position
NILEW715	8/12/2022 13:14	14.0	Follow up reading,No Change,Valve at minimum position
NILEW715	8/18/2022 16:19	0.0	Initial reading,Opened well
NILEW715	11/18/2022 11:42	7.2	Initial reading,Closed well
NILEW715	11/18/2022 11:46	6.6	Follow up reading,No Change
NILEW715	12/2/2022 12:41	0.0	Valve Adjustment:Opened valve 10% or less,Valve 15% open
NILW728A	8/4/2022 14:13	9.8	Valve Adjustment:NSPS/CAI,Valve 75% open
NILW728A	8/19/2022 11:47	18.7	Initial reading,No Change
NILW728A	8/19/2022 11:51	19.1	Follow up reading,No Change
NILW728A	9/14/2022 13:54	0.0	Valve Adjustment:No change,Valve 75% open
NILW728A	1/12/2023 16:20	8.1	Initial reading,No Change
NILW728A	1/12/2023 16:23	7.3	Follow up reading,No Change
NILW728A*	1/27/2023 11:33	16.3	Valve Adjustment:NSPS/CAI
NILEW739	9/14/2022 13:02	5.2	Valve Adjustment:NSPS/CAI,Closed valve 10% or less,Valve 40% open
NILEW739	9/14/2022 13:03	4.9	Valve Adjustment:No change,Valve 40% open
NILEW740	10/14/2022 13:36	7.7	Initial reading,No Change,Valve at minimum position
NILEW740	10/14/2022 17:22	7.9	Follow up reading,No Change,Valve at minimum position
NILEW740	10/24/2022 16:17	7.9	Initial reading,No Change,Valve at minimum position
NILEW740	11/30/2022 12:40	7.5	Initial reading,No Change
NILEW740	12/29/2022 13:55	0.0	Initial reading,Closed well,Lateral Vacuum loss
NILEW759	10/26/2022 13:03	5.7	Valve Adjustment:NSPS/CAI,Valve at minimum position,Closed valve >10%
NILEW759	10/26/2022 13:06	5.5	Valve Adjustment:NSPS/CAI,Valve at minimum position
NILEW759	11/9/2022 15:33	0.7	Valve Adjustment:No change
NILEW759	12/29/2022 13:48	12.2	Valve Adjustment:NSPS/CAI,Closed valve >10%,Valve 10% open
NILEW759	12/29/2022 13:50	12.0	Valve Adjustment:NSPS/CAI,Valve 10% open
NILEW759	1/11/2023 15:00	16.0	Valve Adjustment:NSPS/CAI,Valve 15% open
NILEW759	1/21/2023 10:23	13.1	Initial reading,Closed well,Pump Needs Maintenance
NILEW759*	1/21/2023 10:26	11.2	Follow up reading,No Change
NILEW760	9/14/2022 12:43	16.0	Valve Adjustment:NSPS/CAI,Closed valve 10% or less,Valve 25% open
NILEW760	9/14/2022 12:45	15.5	Valve Adjustment:NSPS/CAI,Valve 25% open
NILEW760	9/27/2022 12:43	15.9	Valve Adjustment:NSPS/CAI,Closed valve 10% or less,Valve 20% open
NILEW760	10/6/2022 11:51	0.0	Initial reading,Opened well
NILEW760	10/26/2022 12:53	11.0	Valve Adjustment:NSPS/CAI,Valve 25% open
NILEW760	10/26/2022 12:55	11.5	Valve Adjustment:NSPS/CAI,Valve 25% open
NILEW760	11/9/2022 15:31	2.4	Valve Adjustment:No change,Valve 25% open
NILEW761	11/9/2022 15:26	6.5	Valve Adjustment:NSPS/CAI,Closed valve 10% or less,Valve 40% open

Table 4. Wells with Oxygen Exceedances
Newby Island Landfill, Milpitas, California
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Well ID	Date and Time	Oxygen (%)	Comments
NILEW761	11/9/2022 15:27	6.5	Valve Adjustment:NSPS/CAI,Valve 40% open
NILEW761	11/18/2022 11:28	0.0	Initial reading,Opened well
NILEW772	1/24/2023 13:36	11.8	Valve Adjustment:NSPS/CAI,Closed valve >10%,Valve 5% open
NILEW772	1/24/2023 13:40	4.8	Valve Adjustment:No change
NILEW786	12/10/2022 9:26	15.0	Initial reading,Closed well
NILEW786	12/10/2022 9:27	15.0	Follow up reading,No Change
NILEW786	12/23/2022 13:24	17.1	Initial reading,Closed well
NILEW786	12/23/2022 13:25	17.5	Follow up reading,No Change
NILEW786	1/12/2023 15:02	0.0	Initial reading,Opened well
NILEW787	11/7/2022 11:59	19.6	Initial reading,Closed well
NILEW787	11/7/2022 12:01	20.1	Follow up reading,No Change
NILEW789	8/8/2022 12:17	15.9	Initial reading,Closed well
NILEW789	8/8/2022 12:19	15.6	Follow up reading,No Change
NILEW789	8/18/2022 11:17	0.0	Initial reading,No Change,Valve at minimum position
NILEW802	8/4/2022 13:34	19.0	Valve Adjustment:NSPS/CAI,Valve at minimum position
NILEW802	8/16/2022 15:03	20.0	Valve Adjustment:NSPS/CAI,Valve at minimum position
NILEW802	9/13/2022 14:51	2.7	Valve Adjustment:No change,Valve at minimum position
NILEW802	9/21/2022 12:58	8.9	Valve Adjustment:NSPS/CAI,Valve at minimum position
NILEW802	9/21/2022 12:59	18.1	Valve Adjustment:NSPS/CAI,Valve at minimum position
NILEW802	10/10/2022 12:20	11.4	Valve Adjustment:NSPS/CAI,Valve at minimum position
NILEW802	10/26/2022 11:39	18.5	Valve Adjustment:NSPS/CAI,Valve at minimum position
NILEW802	11/9/2022 14:19	19.6	Valve Adjustment:NSPS/CAI,Valve at minimum position
NILEW802	11/16/2022 14:17	20.0	Valve Adjustment:NSPS/CAI,Valve at minimum position
NILEW802	12/7/2022 12:40	20.4	Valve Adjustment:NSPS/CAI,Valve at minimum position
NILEW802	12/28/2022 15:50	18.0	Valve Adjustment:NSPS/CAI,Valve at minimum position
NILEW802	1/7/2023 12:23	16.8	Valve Adjustment:NSPS/CAI,Valve at minimum position
NILEW802*	1/18/2023 15:04	19.9	Valve Adjustment:NSPS/CAI,Valve at minimum position
NILEW805	12/10/2022 11:52	10.3	Initial reading,Closed well
NILEW805	12/10/2022 11:53	10.1	Follow up reading,No Change
NILEW805	12/23/2022 15:23	12.9	Initial reading,No Change
NILEW805	1/7/2023 12:37	12.0	Valve Adjustment:NSPS/CAI,Valve at minimum position,Closed valve 10% or less
NILEW805	1/7/2023 12:38	11.7	Valve Adjustment:NSPS/CAI,Valve at minimum position
NILEW805*	1/21/2023 10:02	7.8	Initial reading,No Change,Valve at minimum position
NILEW806	12/6/2022 15:03	5.9	Valve Adjustment:NSPS/CAI,Closed valve 10% or less,Valve 10% open
NILEW806	12/6/2022 15:04	3.7	Valve Adjustment:No change,Valve 10% open
NILCW002	8/17/2022 15:20	6.2	Valve Adjustment:NSPS/CAI,Valve 5% open
NILCW002	8/17/2022 15:21	6.3	Valve Adjustment:NSPS/CAI,Valve 5% open
NILCW002	8/30/2022 13:15	4.3	Valve Adjustment:No change,Valve 5% open
NILCW004	8/17/2022 15:12	6.1	Valve Adjustment:NSPS/CAI,Closed valve 10% or less,Valve 5% open
NILCW004	8/17/2022 15:14	5.3	Valve Adjustment:NSPS/CAI,Valve 5% open
NILCW004	8/30/2022 13:00	0.0	Valve Adjustment:NSPS/CAI,Opened valve 10% or less,Valve 10% open
NILCW004	10/17/2022 16:13	5.9	Initial reading,Closed well
NILCW004	10/17/2022 16:14	5.8	Follow up reading,No Change
NILCW004	11/3/2022 14:55	1.7	Initial reading,No Change,Valve at minimum position
NILCW004	12/10/2022 10:24	6.0	Initial reading,No Change,Valve at minimum position
NILCW004	12/10/2022 10:25	6.0	Follow up reading,No Change
NILCW004	12/23/2022 14:17	9.6	Initial reading,No Change,Valve at minimum position
NILCW004	1/6/2023 13:44	0.9	Initial reading,Opened well
NILHC251	9/13/2022 12:09	8.2	Valve Adjustment:NSPS/CAI,Valve at minimum position
NILHC251	9/13/2022 12:10	8.2	Valve Adjustment:NSPS/CAI
NILHC251	9/27/2022 14:46	5.4	Valve Adjustment:NSPS/CAI,Valve at minimum position
NILHC251	10/11/2022 15:07	5.3	Valve Adjustment:NSPS/CAI,Valve at minimum position
NILHC251	10/11/2022 15:08	5.3	Valve Adjustment:NSPS/CAI,Valve at minimum position
NILHC251	10/24/2022 14:30	7.7	Initial reading,No Change,Valve at minimum position
NILHC251	10/24/2022 14:31	7.7	Initial reading,No Change,Valve at minimum position
NILHC251	10/24/2022 14:34	11.7	Follow up reading,No Change,Valve at minimum position
NILHC251	11/3/2022 13:36	0.0	Initial reading,Opened well
NILHC251	11/21/2022 14:42	7.2	Valve Adjustment:NSPS/CAI,Valve at minimum position
NILHC251	11/21/2022 14:43	7.2	Valve Adjustment:NSPS/CAI,Valve at minimum position
NILHC251	12/6/2022 15:43	3.2	Valve Adjustment:No change,Valve at minimum position
NILHC252	10/24/2022 14:20	5.6	Initial reading,Closed well
NILHC252	10/24/2022 14:27	7.3	Follow up reading,No Change

Table 4. Wells with Oxygen Exceedances
Newby Island Landfill, Milpitas, California
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Well ID	Date and Time	Oxygen (%)	Comments
NILHC252	11/3/2022 13:42	1.5	Initial reading,Opened well
NLCRST05	8/2/2022 13:32	20.6	Valve Adjustment:Valve at minimum position
NLCRST05**	8/17/2022 11:48	19.9	Valve Adjustment:Valve at minimum position
NLCRST3A	8/2/2022 14:54	6.1	Valve Adjustment:Closed valve >10%,Valve 25% open
NLCRST3A	8/2/2022 14:55	6.1	Valve Adjustment:Valve 25% open
NLCRST3A	8/17/2022 13:31	12.2	Valve Adjustment:Valve 25% open
NLCRST3A	8/30/2022 13:49	13.2	Valve Adjustment:Closed valve >10%,Valve 5% open
NLCRST3A	8/30/2022 13:51	13.1	Valve Adjustment:No change,Valve 5% open
NLCRST3A	9/7/2022 14:43	11.9	Valve Adjustment:No change,Valve 5% open
NLCRST3A	9/20/2022 14:31	12.7	Valve Adjustment:No change,Valve 5% open
NLCRST3A	10/4/2022 14:06	0.0	Valve Adjustment:No change,Valve 35% open
NLCRST3B	8/2/2022 14:51	6.1	Valve Adjustment:Closed valve >10%,Valve 50% open
NLCRST3B	8/2/2022 14:52	6.1	Valve Adjustment:No change,Valve 50% open
NLCRST3B	8/17/2022 13:29	12.1	Valve Adjustment:Valve 50% open
NLCRST3B	8/30/2022 13:39	13.3	Valve Adjustment:Closed valve >10%,Valve 10% open
NLCRST3B	8/30/2022 13:42	13.2	Valve Adjustment:No change,Valve 10% open
NLCRST3B	9/7/2022 14:41	11.9	Valve Adjustment:No change,Valve 10% open
NLCRST3B	9/20/2022 14:27	12.7	Valve Adjustment:Valve 10% open
NLCRST3B	10/4/2022 14:04	0.0	Valve Adjustment:No change,Valve 35% open
NILMW004	1/19/2023 16:29	11.7	Initial reading,No Change,Valve at minimum position
NILMW004*	1/19/2023 16:30	11.3	Follow up reading,No Change,Valve at minimum position
NILMW005	1/19/2023 16:32	9.3	Initial reading,No Change,Valve at minimum position
NILMW005*	1/19/2023 16:34	7.0	Follow up reading,No Change
NILMW006	12/27/2022 15:51	6.5	Valve Adjustment:NSPS/CAI,Valve at minimum position,Closed valve 10% or less
NILMW006	12/27/2022 15:52	6.7	Valve Adjustment:NSPS/CAI,Valve at minimum position
NILMW006	1/10/2023 13:26	1.6	Valve Adjustment:No change,Valve at minimum position
NILMW006	1/19/2023 16:35	20.2	Initial reading,No Change,Valve at minimum position
NILMW006*	1/19/2023 16:40	20.4	Follow up reading,No Change,Valve at minimum position
NILMW007	1/19/2023 16:25	19.8	Initial reading,No Change,Valve at minimum position
NILMW007*	1/19/2023 16:27	19.9	Follow up reading,No Change
NILMW008	12/27/2022 15:19	20.4	Valve Adjustment:NSPS/CAI,Valve at minimum position,Closed valve 10% or less
NILMW008	12/27/2022 15:20	20.5	Valve Adjustment:NSPS/CAI,Valve at minimum position
NILMW008	1/10/2023 13:15	19.0	Valve Adjustment:NSPS/CAI,Valve at minimum position
NILMW008*	1/19/2023 16:50	19.6	Initial reading,No Change,Valve at minimum position
NILMW011	12/27/2022 14:58	11.8	Valve Adjustment:NSPS/CAI,Valve at minimum position,Closed valve 10% or less
NILMW011	12/27/2022 15:03	11.0	Valve Adjustment:NSPS/CAI
NILMW011	1/10/2023 13:04	7.7	Valve Adjustment:NSPS/CAI,Valve at minimum position
NILMW011	1/10/2023 13:09	7.3	Valve Adjustment:NSPS/CAI,Valve at minimum position
NILMW011*	1/19/2023 16:42	20.6	Initial reading,No Change,Valve at minimum position
NILMW031	10/3/2022 13:22	19.2	Initial reading,No Change,Valve at minimum position
NILMW031	10/3/2022 13:23	18.8	Follow up reading,No Change
NILMW031	10/17/2022 12:38	0.0	Initial reading,No Change,Valve at minimum position
NILMW031	1/16/2023 13:15	17.7	Initial reading,No Change,Valve at minimum position
NILMW031	1/16/2023 13:17	17.5	Follow up reading,No Change
NILMW031*	1/30/2023 17:09	11.0	Valve Adjustment:NSPS/CAI,Valve at minimum position
NILMW032	12/29/2022 15:43	14.4	Initial reading,No Change,Valve at minimum position
NILMW032	12/29/2022 15:44	13.6	Follow up reading,No Change,Valve at minimum position
NILMW032	1/5/2023 14:13	13.6	Initial reading,No Change,Valve at minimum position
NILMW032*	1/16/2023 13:13	14.7	Initial reading,No Change,Valve at minimum position
NILMW034	8/18/2022 9:31	10.4	Initial reading,No Change,Valve at minimum position
NILMW034	8/18/2022 9:32	10.3	Follow up reading,No Change,Valve at minimum position
NILMW034	8/29/2022 13:28	8.6	Valve Adjustment:NSPS/CAI,Valve at minimum position
NILMW034	9/12/2022 12:43	0.2	Initial reading,Opened well
NILMW034	10/3/2022 13:38	7.0	Initial reading,No Change,Valve at minimum position
NILMW034	10/3/2022 13:40	6.9	Follow up reading,No Change,Valve at minimum position
NILMW034	10/17/2022 12:28	0.0	Initial reading,Opened well
NILMW034	11/7/2022 15:36	10.0	Initial reading,No Change,Valve at minimum position
NILMW034	11/7/2022 15:36	9.9	Follow up reading,No Change
NILMW034	11/17/2022 10:43	6.8	Initial reading,Closed well
NILMW034	11/17/2022 10:46	6.7	Follow up reading,No Change,Valve at minimum position
NILMW034	12/7/2022 12:31	6.7	Valve at minimum position

Table 4. Wells with Oxygen Exceedances
Newby Island Landfill, Milpitas, California
(August 1, 2022 through January 31, 2023)

Well ID	Date and Time	Oxygen (%)	Comments
NILMW034	12/7/2022 12:33	6.8	Follow up reading
NILMW034	12/27/2022 12:34	0.0	No Change
NIBC-17A	9/20/2022 13:16	9.2	Valve Adjustment:NSPS/CAI,Valve at minimum position,Closed valve >10%
NIBC-17A	9/20/2022 13:17	7.5	Valve Adjustment:NSPS/CAI,Valve at minimum position
NIBC-17A	10/4/2022 16:25	11.5	Valve Adjustment:NSPS/CAI,Valve at minimum position
NIBC-17A	10/17/2022 15:55	18.9	Initial reading,No Change
NIBC-17A	11/4/2022 12:15	20.1	Valve Adjustment:NSPS/CAI,Valve at minimum position
NIBC-17A	11/18/2022 9:52	20.6	Initial reading,No Change,Valve at minimum position
NIBC-17A	12/10/2022 10:41	20.9	Initial reading,No Change,Valve at minimum position
NIBC-17A	12/23/2022 14:46	16.0	Initial reading,No Change,Valve at minimum position,Well offline (valve 100% closed)
NIBC-17A	1/12/2023 16:09	14.1	Initial reading,No Change,Well offline (valve 100% closed)
NIBC-17A	1/16/2023 15:38	20.9	Initial reading,Closed well,Well offline (valve 100% closed)
NILFC005	11/3/2022 13:55	19.1	Valve Adjustment:NSPS/CAI,Valve at minimum position
NILFC005	11/3/2022 13:57	19.0	Valve Adjustment:NSPS/CAI,Valve at minimum position
NILFC005	11/15/2022 12:25	16.2	Valve Adjustment:NSPS/CAI,Valve at minimum position
NILFC005	11/16/2022 12:47	16.8	Valve Adjustment:NSPS/CAI,Valve at minimum position
NILFC005	12/7/2022 13:51	12.5	Valve Adjustment:NSPS/CAI,Valve at minimum position
NILFC005	12/29/2022 15:27	1.2	Valve Adjustment:No change,Valve at minimum position
NILFC005	1/25/2023 13:12	16.3	Valve Adjustment:NSPS/CAI,Valve at minimum position
NILFC005*	1/25/2023 13:14	16.3	Valve Adjustment:NSPS/CAI,Valve at minimum position
NILFC006	1/25/2023 13:22	13.9	Valve Adjustment:NSPS/CAI,Valve at minimum position
NILFC006*	1/25/2023 13:25	6.2	Valve Adjustment:NSPS/CAI,Valve at minimum position
NLCR0910	8/11/2022 11:02	19.5	Initial reading,No Change,Ongoing exceedance
NLCR0910	8/17/2022 14:08	20.0	Valve Adjustment:Valve at minimum position
NLCR0910	9/7/2022 15:32	20.4	Valve Adjustment:Valve at minimum position
NLCR0910	9/20/2022 15:18	6.7	Valve Adjustment:Valve at minimum position
NLCR0910	10/4/2022 14:49	0.0	Valve Adjustment:No change,Valve at minimum position
NLCR0910	10/24/2022 15:30	16.9	Valve Adjustment:NSPS/CAI,Valve at minimum position
NLCR0910	10/24/2022 15:31	17.0	Valve Adjustment:NSPS/CAI
NLCR0910	11/4/2022 14:18	19.7	Valve Adjustment:NSPS/CAI,Valve at minimum position
NLCR0910	11/21/2022 13:58	20.9	Initial reading,No Change,Valve at minimum position
NLCR0910	12/6/2022 14:31	20.5	Valve Adjustment:NSPS/CAI,Valve at minimum position
NLCR0910	12/21/2022 15:19	16.7	Valve Adjustment:NSPS/CAI,Valve at minimum position
NLCR0910	1/6/2023 14:19	18.0	Valve Adjustment:NSPS/CAI,Valve at minimum position
NLCR0910*	1/18/2023 13:39	18.5	Valve Adjustment:NSPS/CAI,Valve at minimum position
NLCR1112	8/2/2022 14:58	5.8	Valve Adjustment:Closed valve 10% or less,Valve 20% open
NLCR1112	8/2/2022 14:59	5.8	Valve Adjustment:Valve 20% open
NLCR1112	8/17/2022 13:33	12.1	Valve Adjustment:Valve 20% open
NLCR1112	8/30/2022 13:54	13.0	Valve Adjustment:Closed valve >10%,Valve 5% open
NLCR1112	8/30/2022 13:55	13.0	Valve Adjustment:No change,Valve 5% open
NLCR1112	9/7/2022 14:45	11.6	Valve Adjustment:No change,Valve 5% open
NLCR1112	9/20/2022 14:32	12.6	Valve Adjustment:No change,Valve 5% open
NLCR1112	10/4/2022 14:09	0.0	Valve Adjustment:No change,Valve 5% open
NISS17-1	9/27/2022 11:33	9.3	Valve Adjustment:NSPS/CAI,Closed valve >10%,Valve 20% open
NISS17-1	9/27/2022 11:34	14.1	Valve Adjustment:NSPS/CAI,Valve 20% open
NISS17-1	10/3/2022 16:33	15.2	Initial reading,Closed well
NISS17-1	10/3/2022 16:33	14.6	Follow up reading,No Change
NISS17-1	10/17/2022 13:56	20.6	Initial reading,Closed well
NISS17-1	10/17/2022 13:57	20.5	Follow up reading,No Change
NISS17-1	11/7/2022 12:17	20.9	Initial reading,No Change,Valve at minimum position
NISS17-1	11/17/2022 13:36	0.0	Initial reading,Opened well

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

*Wells noted ***with an asterisk*** indicates wells remained in exceedance for pressure as of the end of the reporting period.

** Wells noted with two **asterisk** indicate wells offline.

Table 5. Wells with Temperature Exceedances
Newby Island Landfill, Milpitas, California
(August 1, 2022 through January 31, 2023)

Well ID	Date and Time	Initial Temp [°F]	Adjusted Temp [°F]	Comments	Corrective Action
NILEW476	11/22/2022 13:16	128.8	131.6	Valve Adjustment:NSPS/CAI,Opened valve 10% or less,Valve 30% open	RCA
NILEW476	11/22/2022 13:17	132.0	132.0	Valve Adjustment:NSPS/CAI,Valve 30% open	
NILEW476	12/6/2022 16:02	131.9	132.0	Valve Adjustment:NSPS/CAI,Valve 30% open	
NILEW476	12/6/2022 16:03	131.8	131.8	Valve Adjustment:NSPS/CAI,Valve 30% open	
NILEW476	12/10/2022 9:13	128.5	129.0	Initial reading,Opened well	
NILEW476	1/5/2023 16:03	130.6	131.3	Initial reading,Opened well	N/A
NILEW476	1/5/2023 16:04	131.4	131.4	Follow up reading,No Change	
NILEW476*	1/18/2023 15:14	131.9	131.9	Valve Adjustment:NSPS/CAI,Valve 40% open	
NILEW701	8/8/2022 14:24	132.5	132.5	Initial reading,No Change	RCA
NILEW701	8/18/2022 13:30	132.3	132.3	Initial reading,No Change	
NILEW701	9/12/2022 16:59	130.5	130.5	Initial reading,Opened well	
NILEW701	9/27/2022 11:07	130.8	131.2	Valve Adjustment:NSPS/CAI,Valve 5% open	N/A
NILEW701	9/29/2022 15:33	133.3	133.3	Valve Adjustment:NSPS/CAI,Valve 5% open	
NILEW701	10/3/2022 14:52	127.6	127.6	Initial reading,Opened well	
NILEW701	11/11/2022 13:10	134.0	134.0	Valve Adjustment:NSPS/CAI,Valve 25% open	RCA
NILEW701	11/17/2022 13:13	131.2	131.2	Initial reading,No Change	
NILEW701	12/10/2022 8:49	128.2	128.3	Initial reading,Opened well	
NILEW759	8/12/2022 14:25	132.7	132.8	Initial reading,Closed well	N/A
NILEW759	8/12/2022 14:26	131.4	131.7	Follow up reading,No Change	
NILEW759	8/25/2022 14:21	96.3	97.2	Valve Adjustment:No change,Valve 25% open	

Note: All required corrective action and remonitoring was completed in accordance with Rule 8-34 and NSPS timelines.
All temperature exceedance were corrected within 15 days except for the wells noted in ***bold italics*** . Root cause analysis forms were completed for these wells.
*Wells noted ***with an asterick*** indicates wells remained in exceedance at the end of the reporting period.

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:

Signature of Responsible Official

2/28/2023
Date

Kevin Divincenzo
Name of Responsible Official

Appendix B – Existing GCCS Layout

LEGEND

100	EXISTING MAJOR 10' CONTOUR	30"	EXISTING 30" LFG COLLECTION HEADER PIPING
EW/MW	EXISTING VERTICAL LFG EXTRACTION WELL	24"	EXISTING 24" LFG COLLECTION HEADER PIPING
EW	EXISTING DUAL CASING WELL	18"	EXISTING 18" LFG COLLECTION HEADER PIPING
	EXISTING REMOTE WELLHEAD	16"	EXISTING 16" LFG COLLECTION HEADER PIPING
	EXISTING HORIZONTAL MANIFOLD	12"	EXISTING 12" LFG COLLECTION HEADER PIPING
GP-X	EXISTING PROBE	10"	EXISTING 10" LFG COLLECTION LATERAL PIPING
CS	EXISTING CONDENSATE SUMP	8"	EXISTING 8" LFG COLLECTION LATERAL PIPING
	EXISTING PRESSURE RELIEF VALVE	6"	EXISTING 6" LFG COLLECTION LATERAL PIPING
	EXISTING SAMPLE PORT	4"	EXISTING 4" LFG COLLECTION LATERAL PIPING
	EXISTING ROAD CROSSING	2"	EXISTING 2" LFG COLLECTION LATERAL PIPING
	EXISTING ISOLATION VALVE	2"	EXISTING AIR SUPPLY LINE
	EXISTING REDUCER FITTING	2"/3"/4"	EXISTING FORCE MAIN CONDENSATE LINE
	EXISTING BLIND FLANGE		EXISTING HORIZONTAL COLLECTOR
H2S-1	TREATMENT SYSTEM		BELOW GRADE PIPES ARE SHOWN DASHED

MANIFOLD-1 MANIFOLD-2 MANIFOLD-3 MANIFOLD-4 MANIFOLD-5 MANIFOLD-6 MANIFOLD-7 MANIFOLD-8 MANIFOLD-9 MANIFOLD-10 MANIFOLD-11 MANIFOLD-12 MANIFOLD-13 MANIFOLD-14 MANIFOLD-15 MANIFOLD-16 MANIFOLD-17 MANIFOLD-18 MANIFOLD-19

STATION 1 STATION 2 STATION 3 STATION 4 STATION 5 STATION 6

FLARE STATION TANK FARM

GRAPHIC SCALE
250' 125' 0 250' 500' 750'
SCALE: 1"=250'

NO.	REVISION	DATE

SHEET TITLE: OVERALL 2021 AS-BUILT PLAN

PROJECT TITLE: NEWBY ISLAND LANDFILL MILPITAS, CALIFORNIA

CLIENT:

SCS ENGINEERS
ENVIRONMENTAL CONSULTANTS
8799 BALBOA AVENUE SUITE 290
SAN DIEGO, CA 92123
(858) 571-5500 FAX: (562) 427-0805

PROJ. NO.	01221039.01 T2
DSN. BY:	AAS
DWN. BY:	AAS
CHK. BY:	MD
APP. BY:	MD
ACAD FILE	K:\ENGINEERS

DATE: 062221

SCALE: AS SHOWN

SHEET: 1

C:\Users\47470_s\Desktop\All Projects\Newby Island LF - Task 2 - As-Built Drawings\NEWBY LF GCCS LAYOUT ASBUILT SITE UPDATE_062221.dwg Jun 29, 2021 - 9:6am By: 47470_s

Appendix C – Surface Emission and GCCS Component Leak Monitoring Results

November 17, 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 Third Quarter 2022.

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 2022. 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

Sean Bass
Sr. Project Manager
SCS Field Services

Encl.

Michael Flanagan, SCS Field Services

Newby Island Landfill

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

Third Quarter 2022

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 | November 17 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 Third Quarter 2022

INTRODUCTION

This letter provides results of the August 8, 9, 10, 11, 12, 18, 19, and 26, 2022 and September 7, 2022, 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 August 8, 9, 10, 11, 12, 18, 19, and 26, 2022 and September 7, 2022, SCS performed third quarter 2022 SEM as required by the Bay Area Air Quality Management District (BAAQMD). Instantaneous surface emissions monitoring results indicated that twenty-six (26) 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 seventeen (17) 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 December 24, 2022. However, since the NSPS timeline will become due first, the December 6, 2022 deadline should be adhered to for complying with the NSPS and LMR exceedances.

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 (1) test location was out of compliance with the 500 ppmv requirement. Results are discussed in a subsequent section of this report.

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, twenty (20) 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 August 8, 9, 10, 11, 12, 18, 19, and 26, 2022 and September 7, 2022, 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 August 8, 9, 10, 11, 12, 18, 19, and 26, 2022 and September 7, 2022, SCS performed third quarter 2022 instantaneous emissions monitoring testing as required by the BAAQMD. During this monitoring, surface emissions results indicated that twenty-six (26) locations exceeded the 500 ppmv maximum concentration. The required first and second 10-day (LMR/NSPS) and 30-day (NSPS) follow-up monitoring performed on August 18, 19, 26 and September 7, 2022, 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 at this time. These results are discussed in a subsequent section of this report.

Additionally, calculated integrated grid monitoring indicated seventeen (17) integrated exceedances of the 25-ppmv requirement on August 8, 9, 10, 11, and 12, 2022. The required first and second 10-day LMR follow-up monitoring performed on August 18, 19, and 26, 2022, 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 December 24, 2022. However, since the NSPS timeline will become due first, the December 6, 2022 deadline should be adhered to for complying with the NSPS and LMR exceedances. 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 2022.

PRESSURIZED PIPE AND COMPONENT LEAK MONITORING

On August 11, 2022, 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. Results indicated that one (1) location exceeded the 500 ppmv maximum concentration. The required 7-day (LMR & NSPS) follow-up monitoring performed on August 18, 2022 indicated that the area had returned to compliance following system adjustments and remediation by SCS and site personnel. Based on these monitoring results no additional follow up testing was required. Results of the monitoring are shown in Table 1 (for component results). Calibration logs for the monitoring equipment are provided in Attachment 5.

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 2022 (October through December) surface emissions testing event is scheduled to be performed by the end of December 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

N

GRAPHIC SCALE

250' 125' 0 250' 500' 750'

SCALE: 1"=250'

LEGEND

- EXISTING MAJOR 10' CONTOUR
- EW/MW EXISTING VERTICAL LFG EXTRACTION WELL
- EW EXISTING DUAL CASING WELL
- EXISTING REMOTE WELLHEAD
- EXISTING HORIZONTAL MANIFOLD
- GP-X EXISTING PROBE
- CS EXISTING CONDENSATE SUMP
- EXISTING SAMPLE PORT
- EXISTING ROAD CROSSING
- EXISTING ISOLATION VALVE
- EXISTING REDUCER FITTING
- EXISTING BLIND FLANGE
- H2S-1 TREATMENT SYSTEM
- 112 AB32 SEM GRID
- LIMITS OF WASTE (APPROXIMATE)

NOTES:

1. EXISTING TOPOGRAPHIC SURVEY INFORMATION SHOWN WAS PROVIDED BY COOPER AERIAL SURVEY CO. AERIAL PHOTOGRAPHY DATED JANUARY 17, 2021.
2. 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.
3. SEM PATH MAY VARY BASED ON FILL OPERATIONS, WEATHER, AND OTHER FIELD CONDITIONS.
4. AREAS WITH STEEP SLOPES OR OTHER DANGEROUS AREAS (E.G., ACTIVE FACILITY WORKING AREAS AND HAUL ROADS) AVOIDED.

NO.	REVISION	DATE

SHEET TITLE: GCCS SEM MAP

PROJECT TITLE: NEWBY ISLAND LANDFILL MILPITAS, CALIFORNIA

CLIENT:

SCS ENGINEERS
ENVIRONMENTAL CONSULTANTS
4683 CHABOT DRIVE SUITE 200
PLEASANTON, CA 94588
(925)426-0080

PROJ. NO. 01221039.05 T4 | DSN. BY: AAS | DWN. BY: AAS | CHK. BY: MD | ACAD FILE: K:/ENGINEERS | APP. BY: MD

DATE: 11-04-21

SCALE: AS SHOWN

SHEET: 1

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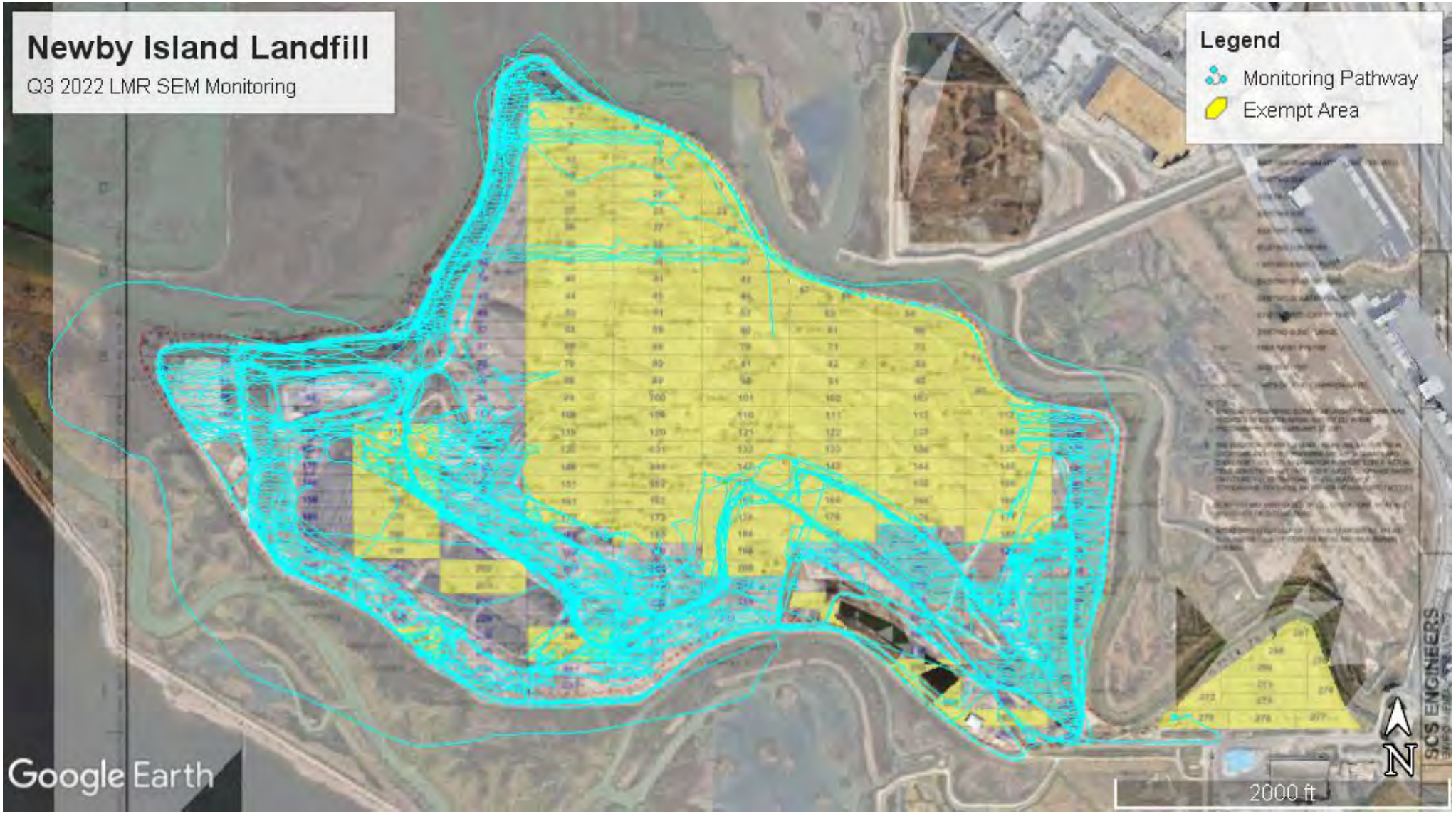
Attachment 2

Surface Pathway



Third Quarter 2022

LMR Surface Emissions Monitoring Pathway

Newby Island Landfill, Milpitas, California

Attachment 3

Instantaneous and Component Emissions Monitoring Results

Third Quarter 2022

Table 1. LMR Instantaneous Surface and Component Emissions Monitoring Results

Newby Island Sanitary Landfill, Milpitas, California

Instantaneous Data Report for August 8, 9, 10, 11, 12, 18, 19 and September 7, 2022.

Location	Initial	Initial	Initial	Initial	Initial	First 10-Day	First 10-Day	Second 10-Day	30-Day	Latitude/Longitude
	8-Aug	9-Aug	10-Aug	11-Aug	12-Aug	18-Aug	19-Aug	26-Aug	7-Sep	
Surface Reading Grid 6 BO	990	--	--	--	--	15	--	--	124	N37° 27.869' W121° 56.725'
GRID 241 HSR RY	--	1,125	--	--	--	Inaccessible		60	58.1	N37° 27.388' W121° 56.545'
EW601	--	--	635	--	--	Inaccessible	--	70	Active	N37° 27.606' W121° 56.715'
EW767	--	--	1,244	--	--	177	--	--	144	N37° 27.399' W121° 56.477'
EW669	--	--	1,346	--	--	70	--	--	80.4	N37° 27.405' W121° 56.664'
EW692	--	--	2,607	--	--	187	--	--	433	N37° 27.734' W121° 56.762'
EW638	--	--	911	--	--	60	--	--	80.4	N37° 27.400' W121° 56.835'
EW712	--	--	2,275	--	--	4	--	--	496	N37° 27.395' W121° 56.572'
EW569	--	--	1,000	--	--	22	--	--	108	N37° 27.588' W121° 56.970'
Black Pipe RY	--	--	--	601	--	87	--	--	117	N37° 27.405' W121° 56.549'
White UG pipe RY	--	--	--	712	--	30	--	--	478	N37° 27.534' W121° 56.472'
0155	--	--	--	1000	--	48	--	--	200	N37° 27.412' W121° 56.895'
2IN PIPE (component)	--	--	--	--	1,164	15	--	--	27.6	N37° 27.487' W121° 56.640'
2IN PIPE BO3	--	--	--	--	586	9	--	--	329	N37° 27.491' W121° 56.759'

Third Quarter 2022

Table 1. LMR Instantaneous Surface and Component Emissions Monitoring Results

Newby Island Sanitary Landfill, Milpitas, California

Location	Initial	Initial	Initial	Initial	Initial	First 10-Day	First 10-Day	Second 10-Day	30-Day	Latitude/Longitude
	8-Aug	9-Aug	10-Aug	11-Aug	12-Aug	18-Aug	19-Aug	26-Aug	7-Sep	
2IN PIPE BO4 (Component)	--	--	--	--	4,730	7	--	--	81.4	N37° 27.495' W121° 56.759'
FNC POST & WHT PIPE	--	--	--	--	1,143	Removed	--	--	38.9	N37° 27.536' W121° 56.783'
PIPE VALVE	--	--	--	--	1,309	155	--	--	102	N37° 27.368' W121° 56.536'
RBR BO1	--	--	--	--	4,886	Removed	--	--	244	N37° 27.434' W121° 56.592'
RBR BO2	--	--	--	--	1,944	Removed	--	--	239	N37° 27.433' W121° 56.592'
RBR BO4	--	--	--	--	8,706	Removed	--	--	124	N37° 27.505' W121° 56.708'
EP P GAS SIGHN5	--	--	--	--	1,000	1.9	--	--	159	N37° 27.444' W121° 56.949'
EP P GASSIGN5	--	--	--	--	2,143	8.4	--	--	63.4	N37° 27.329' W121° 56.730'
EP P REBAR9 - component & borehole	--	--	--	--	500	24	--	--	364	N37° 27.445' W121° 56.989'
EP P WELL3	--	--	--	--	1,000	--	188	--	248	N37° 27.417' W121° 56.929'
EP P WELL4	--	--	--	--	1,000	--	227	--	317	N37° 27.406' W121° 56.903'
EP P WELL 7	--	--	--	--	1,142	2.4	--	--	201	N37° 27.339' W121° 56.754'
EW636	--	--	370	--	--	--	--	--	--	N37° 27.443' W121° 56.883'
Surface Reading Grid 221 RR	--	--	358	--	--	--	--	--	--	N37° 27.403' W121° 56.616'
Surface Reading Grid	265	--	--	--	--	--	--	--	--	N37° 27.865' W121° 56.724'

Third Quarter 2022

Table 1. LMR Instantaneous Surface and Component Emissions Monitoring Results

Newby Island Sanitary Landfill, Milpitas, California

Location	Initial	Initial	Initial	Initial	Initial	First 10-Day	First 10-Day	Second 10-Day	30-Day	Latitude/Longitude
	8-Aug	9-Aug	10-Aug	11-Aug	12-Aug	18-Aug	19-Aug	26-Aug	7-Sep	
Surface Reading Grid 6 BO2	355	--	--	--	--	--	--	--	--	N37° 27.870' W121° 56.732'
Surface Reading Grid 126 DR	--	416	--	--	--	--	--	--	--	N37° 27.543' W121° 57.035'
Surface Reading Grid 126 DR1	--	376	--	--	--	--	--	--	--	N37° 27.539' W121° 57.034'
Surface Reading Grid 210 EP	--	219	--	--	--	--	--	--	--	N37° 27.406' W121° 56.903'
Surface Reading Grid 238 EP2	--	410	--	--	--	--	--	--	--	N37° 27.389' W121° 56.857'
Surface Reading Grid 245 NH	--	300	--	--	--	--	--	--	--	N37° 27.504' W121° 56.742'
EP HORIZONTAL 12 INCH	--	400	--	--	--	--	--	--	--	N37° 27.445' W121° 56.673'
Wooden Post-RY	--	--	--	458	--	--	--	--	--	N37° 27.681' W121° 56.840'
Black PipeRY1	--	--	--	277	--	--	--	--	--	N37° 27.489' W121° 56.527'
FN PST BO	--	--	--	--	279	--	--	--	--	N37° 27.487' W121° 56.633'

Third Quarter 2022

Table 1. LMR Instantaneous Surface and Component Emissions Monitoring Results

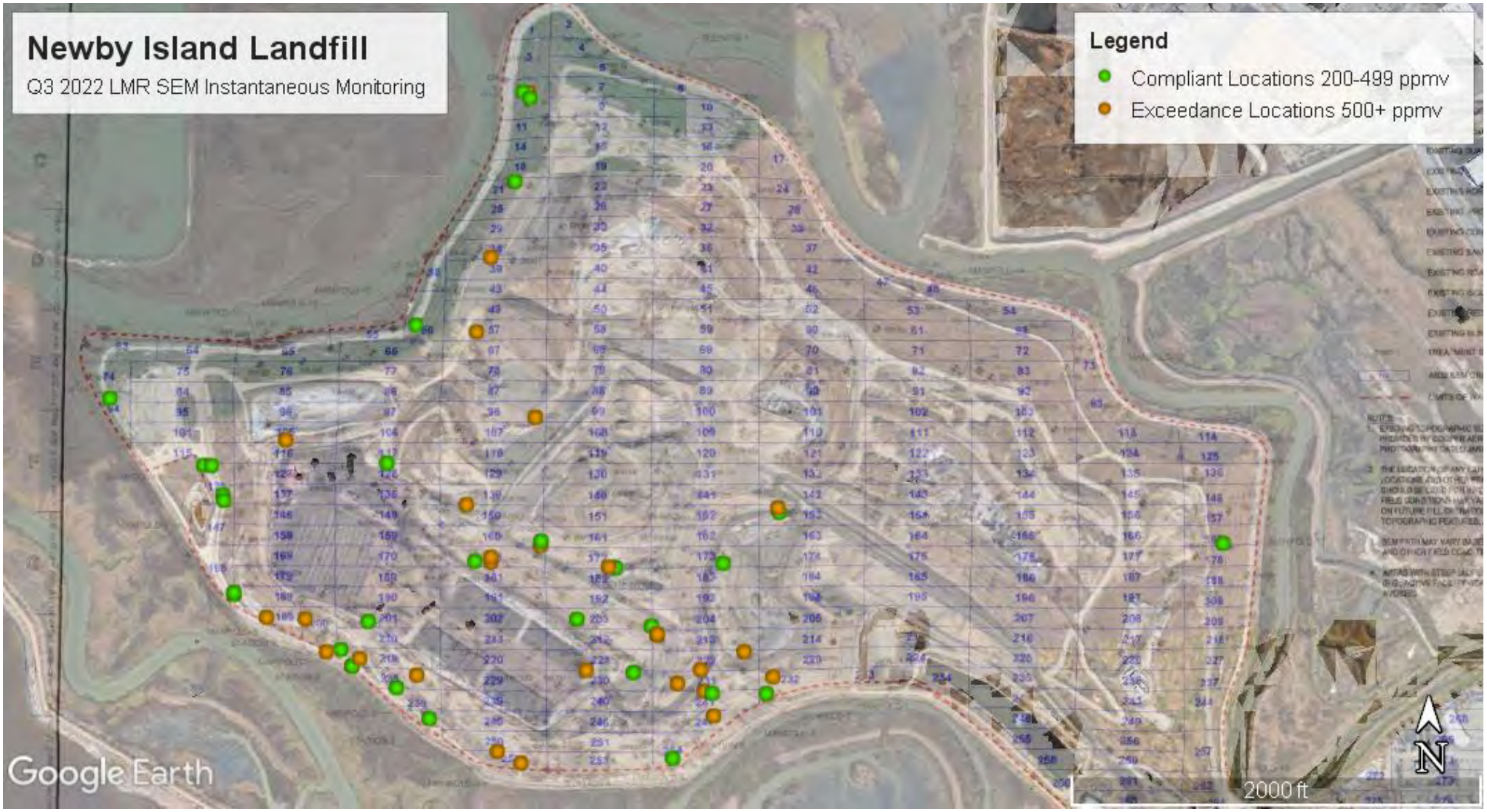
Newby Island Sanitary Landfill, Milpitas, California

Location	Initial	Initial	Initial	Initial	Initial	First 10-Day	First 10-Day	Second 10-Day	30-Day	Latitude/Longitude
	8-Aug	9-Aug	10-Aug	11-Aug	12-Aug	18-Aug	19-Aug	26-Aug	7-Sep	
FNCT PST BO6	--	--	--	--	223	--	--	--	--	N37° 27.385' W121° 56.483'
RB BO3	--	--	--	--	276	--	--	--	--	N37° 27.508' W121° 56.707'
RBR BO	--	--	--	--	383	--	--	--	--	N37° 27.441' W121° 56.598'
RBR BO14	--	--	--	--	265	--	--	--	--	N37° 27.491' W121° 56.775'
RBR - BO17	--	--	--	--	353	--	--	--	--	N37° 27.387' W121° 56.538'
RISER BO	--	--	--	--	371	--	--	--	--	N37° 27.333' W121° 56.577'
EP P REBAR8	--	--	--	--	250	--	--	--	--	N37° 27.465' W121° 57.023'

Pressurized Pipe

Location	Initial Concentration (ppmv) Nov 29, 2021	7-Day Recheck Concentration (ppmv) Nov 29, 2021	Latitude	Latitude
Flare Station	2,042	2.00	37.455070°	121.950284°

No other exceedances of the 500 ppm threshold observed during the LMR/NSPS monitoring performed during the third quarter 2022.



Third Quarter 2022

Initial Emissions Monitoring Locations Greater Than 200 ppmv

Newby Island Landfill Milpitas, California

Attachment 4

Integrated Monitoring Results

Third Quarter 2022
Table 2. Integrated Surface Emissions Monitoring Results
Newby Island Landfill, Milpitas, California

Point Name	Record Date	FID Concentration (ppm)	Comments
NIL-001	8/9/2022 19:48	3.18	--
NIL-002	8/9/2022 19:16	3.92	--
NIL-003	8/8/2022 21:18	3.66	--
NIL-003	8/9/2022 19:03	3.29	--
NIL-004	8/10/2022 08:54	3.97	--
NIL-005	--	--	Exempt
NIL-006	8/8/2022 21:43	10.08	--
NIL-007	--	--	Exempt
NIL-008	--	--	Exempt
NIL-009	--	--	Exempt
NIL-010	--	--	Exempt
NIL-011	8/9/2022 18:32	7.64	--
NIL-012	--	--	Exempt
NIL-013	--	--	Exempt
NIL-014	8/9/2022 18:18	29.86	Initial Monitoring
NIL-014	8/19/2022 08:54	24.54	10-Day Recheck
NIL-015	--	--	Exempt
NIL-016	--	--	Exempt
NIL-017	--	--	Exempt
NIL-018	8/9/2022 18:02	16.75	--
NIL-019	--	--	Exempt
NIL-020	--	--	Exempt
NIL-021	8/9/2022 17:44	58.92	Initial Monitoring
NIL-021	8/19/2022 09:09	15.78	10-Day Recheck
NIL-022	--	--	Exempt
NIL-023	--	--	Exempt
NIL-024	--	--	Exempt
NIL-025	8/9/2022 17:29	10.74	--
NIL-026	--	--	Exempt
NIL-027	--	--	Exempt
NIL-028	--	--	Exempt
NIL-029	8/9/2022 17:06	5.35	--
NIL-030	--	--	Exempt
NIL-031	--	--	Missing Grid on Grid Map
NIL-032	--	--	Exempt
NIL-033	--	--	Exempt
NIL-034	8/9/2022 16:39	4.22	--
NIL-035	--	--	Exempt
NIL-036	--	--	Exempt
NIL-037	--	--	Exempt
NIL-038	8/10/2022 09:14	0.81	--
NIL-039	8/9/2022 16:21	4.42	--

Third Quarter 2022
Table 2. Integrated Surface Emissions Monitoring Results
Newby Island Landfill, Milpitas, California

Point Name	Record Date	FID Concentration (ppm)	Comments
NIL-040	--	--	Exempt
NIL-041	--	--	Exempt
NIL-042	--	--	Exempt
NIL-043	8/9/2022 15:36	0.64	--
NIL-044	--	--	Exempt
NIL-045	--	--	Exempt
NIL-046	--	--	Exempt
NIL-047	--	--	Exempt
NIL-048	--	--	Exempt
NIL-049	8/9/2022 15:14	2.57	--
NIL-050	--	--	Exempt
NIL-051	--	--	Exempt
NIL-052	--	--	Exempt
NIL-053	--	--	Exempt
NIL-054	--	--	Exempt
NIL-055	8/10/2022 10:35	7.52	--
NIL-056	8/10/2022 10:20	2.52	--
NIL-057	8/9/2022 14:31	6.93	--
NIL-058	--	--	Exempt
NIL-059	--	--	Exempt
NIL-060	--	--	Exempt
NIL-061	--	--	Exempt
NIL-062	--	--	Exempt
NIL-063	8/8/2022 17:17	1.73	--
NIL-064	8/8/2022 17:16	10.21	--
NIL-065	8/8/2022 17:16	2.31	--
NIL-066	8/8/2022 17:19	4.13	--
NIL-067	8/8/2022 17:17	3.25	--
NIL-068	--	--	Exempt
NIL-069	--	--	Exempt
NIL-070	--	--	Exempt
NIL-071	--	--	Exempt
NIL-072	--	--	Exempt
NIL-073	--	--	Exempt
NIL-074	8/8/2022 17:56	4.66	--
NIL-075	8/8/2022 17:58	1.68	--
NIL-076	8/8/2022 17:57	1.97	--
NIL-077	8/8/2022 17:58	1.49	--
NIL-078	8/8/2022 17:57	3.47	--
NIL-079	--	--	Exempt
NIL-080	--	--	Exempt
NIL-081	--	--	Exempt
NIL-082	--	--	Exempt

Third Quarter 2022
Table 2. Integrated Surface Emissions Monitoring Results
Newby Island Landfill, Milpitas, California

Point Name	Record Date	FID Concentration (ppm)	Comments
NIL-083	--	--	Exempt
NIL-084	8/8/2022 18:32	3.76	--
NIL-085	8/8/2022 18:27	2.16	--
NIL-086	8/8/2022 18:28	2.96	--
NIL-087	8/8/2022 18:29	3.84	--
NIL-088	--	--	Exempt
NIL-089	--	--	Exempt
NIL-090	--	--	Exempt
NIL-091	--	--	Exempt
NIL-092	--	--	Exempt
NIL-093	--	--	Exempt
NIL-094	8/8/2022 18:59	3.71	--
NIL-095	8/8/2022 19:13	4.95	--
NIL-096	8/8/2022 19:03	1.71	--
NIL-097	8/8/2022 19:11	4.09	--
NIL-098	8/8/2022 19:26	4.08	--
NIL-099	--	--	Exempt
NIL-100	--	--	Exempt
NIL-101	--	--	Exempt
NIL-102	--	--	Exempt
NIL-103	--	--	Exempt
NIL-104	8/8/2022 21:03	2.45	--
NIL-105	8/8/2022 21:09	3.52	--
NIL-106	8/8/2022 21:15	2.42	--
NIL-107	8/8/2022 21:11	5.19	--
NIL-108	--	--	Exempt
NIL-109	--	--	Exempt
NIL-110	--	--	Exempt
NIL-111	--	--	Exempt
NIL-112	--	--	Exempt
NIL-113	--	--	Exempt
NIL-114	8/8/2022 17:42	2.40	--
NIL-115	8/9/2022 14:35	23.25	--
NIL-116	8/10/2022 11:16	3.48	--
NIL-117	--	--	Exempt
NIL-118	8/12/2022 10:19	10.96	
NIL-119	--	--	Exempt
NIL-120	--	--	Exempt
NIL-121	--	--	Exempt
NIL-122	--	--	Exempt
NIL-123	--	--	Exempt
NIL-124	--	--	Exempt
NIL-125	8/8/2022 18:04	2.01	--

Third Quarter 2022
Table 2. Integrated Surface Emissions Monitoring Results
Newby Island Landfill, Milpitas, California

Point Name	Record Date	FID Concentration (ppm)	Comments
NIL-126	8/9/2022 15:22	32.49	Initial Monitoring
NIL-126	8/18/2022 15:30	57.56	First 10-Day Recheck
NIL-126	8/19/2022 09:38	22.67	Second 10-Day Recheck
NIL-127	8/9/2022 15:10	3.01	--
NIL-128	--	--	Exempt
NIL-129	8/8/2022 22:02	7.39	--
NIL-130	--	--	Exempt
NIL-131	--	--	Exempt
NIL-132	--	--	Exempt
NIL-133	--	--	Exempt
NIL-134	--	--	Exempt
NIL-135	--	--	Exempt
NIL-136	8/9/2022 13:26	9.96	--
NIL-137	8/9/2022 15:46	10.63	--
NIL-138	--	--	Exempt
NIL-139	8/8/2022 20:42	9.35	--
NIL-140	--	--	Exempt
NIL-141	--	--	Exempt
NIL-142	--	--	Exempt
NIL-143	--	--	Exempt
NIL-144	--	--	Exempt
NIL-145	--	--	Exempt
NIL-146	8/8/2022 18:53	1.21	--
NIL-147	8/9/2022 16:14	25.41	Initial Monitoring
NIL-147	8/19/2022 09:49	21.15	10-Day Recheck
NIL-148	8/9/2022 16:04	8.70	--
NIL-149	--	--	Exempt
NIL-150	8/8/2022 19:10	7.89	--
NIL-151	--	--	Exempt
NIL-152	--	--	Exempt
NIL-153	--	--	Exempt
NIL-154	--	--	Exempt
NIL-155	--	--	Exempt
NIL-156	--	--	Exempt
NIL-157	8/8/2022 19:04	1.19	--
NIL-158	8/9/2022 16:25	6.32	--
NIL-159	--	--	Exempt
NIL-160	8/8/2022 18:31	7.37	--
NIL-161	--	--	Exempt
NIL-162	--	--	Exempt
NIL-163	--	--	Exempt
NIL-164	--	--	Exempt
NIL-165	--	--	Exempt

Third Quarter 2022
Table 2. Integrated Surface Emissions Monitoring Results
Newby Island Landfill, Milpitas, California

Point Name	Record Date	FID Concentration (ppm)	Comments
NIL-166	--	--	Exempt
NIL-167	8/8/2022 19:27	1.50	--
NIL-168	8/10/2022 11:53	7.53	--
NIL-169	8/9/2022 16:34	11.88	--
NIL-170	--	--	Exempt
NIL-171	8/8/2022 17:41	14.59	--
NIL-172	--	--	Exempt
NIL-173	--	--	Exempt
NIL-174	--	--	Exempt
NIL-175	--	--	Exempt
NIL-176	--	--	Exempt
NIL-177	--	--	Exempt
NIL-178	8/9/2022 13:50	7.67	--
NIL-179	8/9/2022 18:32	11.61	--
NIL-180	--	--	Exempt
NIL-181	8/8/2022 17:02	21.67	--
NIL-182	8/8/2022 16:52	8.86	--
NIL-183	--	--	Exempt
NIL-184	--	--	Exempt
NIL-185	--	--	Exempt
NIL-186	8/10/2022 09:47	3.40	--
NIL-187	--	--	Exempt
NIL-188	8/8/2022 21:52	2.46	--
NIL-189	8/9/2022 18:14	14.34	--
NIL-190	--	--	Exempt
NIL-191	8/10/2022 11:30	19.21	--
NIL-192	8/8/2022 17:48	16.99	--
NIL-193	8/8/2022 21:43	13.19	--
NIL-194	--	--	Exempt
NIL-195	8/10/2022 13:08	9.69	--
NIL-196	8/10/2022 10:04	3.64	--
NIL-197	8/9/2022 14:04	6.77	--
NIL-198	8/8/2022 22:08	2.95	--
NIL-199	8/9/2022 17:45	20.20	--
NIL-200	8/9/2022 17:37	6.74	--
NIL-201	8/10/2022 11:43	7.82	--
NIL-202	--	--	Exempt
NIL-203	8/8/2022 18:14	32.04	Initial Monitoring
NIL-203	8/18/2022 13:36	24.11	10-Day Recheck
NIL-204	8/8/2022 21:12	25.83	Initial Monitoring
NIL-204	8/18/2022 13:36	33.61	First 10-Day Recheck
NIL-204	8/26/2022 09:08	44.45	Second 10-Day Recheck
NIL-205	--	--	Exempt

Third Quarter 2022
Table 2. Integrated Surface Emissions Monitoring Results
Newby Island Landfill, Milpitas, California

Point Name	Record Date	FID Concentration (ppm)	Comments
NIL-206	8/9/2022 18:37	12.25	--
NIL-207	8/9/2022 18:43	9.95	--
NIL-208	8/9/2022 14:47	2.36	--
NIL-209	8/9/2022 14:22	1.57	--
NIL-210	8/9/2022 17:14	12.24	--
NIL-211	--	--	Exempt
NIL-212	8/10/2022 12:30	18.58	--
NIL-213	8/9/2022 17:50	59.18	Initial Monitoring
NIL-213	8/19/2022 10:13	35.44	First 10-Day Recheck
NIL-213	8/26/2022 11:57	21.64	Second 10-Day Recheck
NIL-214	8/9/2022 19:31	18.23	--
NIL-215	8/9/2022 19:29	10.65	--
NIL-216	8/9/2022 16:10	2.51	--
NIL-217	8/9/2022 15:49	1.69	--
NIL-218	8/9/2022 15:39	1.32	--
NIL-219	8/9/2022 16:32	30.56	Initial Monitoring
NIL-219	8/19/2022 09:50	20.29	10-Day Recheck
NIL-220	8/9/2022 16:21	80.62	Initial Monitoring
NIL-220	8/19/2022 12:00	N/A	Inaccessible/Active Grid
NIL-221	8/10/2022 12:39	22.18	Initial Monitoring
NIL-221	8/18/2022 14:34	26.25	10-Day Recheck
NIL-221	8/19/2022 12:00	N/A	Inaccessible/Active Grid
NIL-221	8/26/2022 12:00	N/A	Inaccessible/Active Grid
NIL-222	8/8/2022 18:54	26.55	Initial Monitoring
NIL-222	8/18/2022 14:16	19.05	10-Day Recheck
NIL-223	8/9/2022 19:51	15.34	--
NIL-224	--	--	Exempt
NIL-225	8/9/2022 16:39	3.59	--
NIL-226	8/9/2022 16:52	2.59	--
NIL-227	8/9/2022 16:39	2.26	--
NIL-228	8/9/2022 15:35	27.11	Initial Monitoring
NIL-228	8/19/2022 10:27	22.58	10-Day Recheck
NIL-229	8/9/2022 15:45	60.32	Initial Monitoring
NIL-229	8/19/2022 12:00	N/A	Inaccessible/Active Grid
NIL-229	8/26/2022 12:00	N/A	Inaccessible/Active Grid
NIL-230	8/10/2022 12:46	22.77	--
NIL-231	8/9/2022 16:26	25.14	Initial Monitoring
NIL-231	8/19/2022 09:35	32.12	First 10-Day Recheck
NIL-231	8/26/2022 11:42	31.55	Second 10-Day Recheck
NIL-232	8/10/2022 12:42	19.35	--
NIL-233	8/10/2022 12:38	25.17	Initial Monitoring
NIL-233	8/19/2022 11:04	10.82	10-Day Recheck
NIL-234	--	--	Exempt

Third Quarter 2022
Table 2. Integrated Surface Emissions Monitoring Results
Newby Island Landfill, Milpitas, California

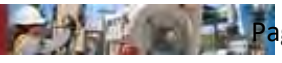
Point Name	Record Date	FID Concentration (ppm)	Comments
NIL-235	8/9/2022 19:32	4.69	--
NIL-236	8/9/2022 17:26	2.40	--
NIL-237	8/9/2022 17:34	1.89	--
NIL-238	--	--	Exempt
NIL-239	8/9/2022 15:04	19.42	--
NIL-240	--	--	Exempt
NIL-241	8/8/2022 18:19	6.64	--
NIL-241	8/9/2022 15:41	31.67	Initial Monitoring
NIL-241	8/19/2022 08:56	23.14	10-Day Recheck
NIL-242	8/10/2022 08:46	3.26	--
NIL-243	8/9/2022 18:43	3.27	--
NIL-244	8/9/2022 18:03	1.98	--
NIL-245	8/9/2022 14:19	43.24	Initial Monitoring
NIL-245	8/19/2022 10:39	9.34	10-Day Recheck
NIL-246	--	--	Exempt
NIL-247	8/8/2022 17:56	8.44	--
NIL-247	8/9/2022 14:56	15.47	--
NIL-248	8/10/2022 08:37	4.58	--
NIL-249	8/10/2022 08:08	3.76	--
NIL-250	8/8/2022 21:31	9.80	--
NIL-251	8/8/2022 18:57	6.42	--
NIL-252	8/8/2022 20:57	8.15	--
NIL-253	8/8/2022 20:52	7.44	--
NIL-254	8/9/2022 14:40	32.45	Initial Monitoring
NIL-254	8/19/2022 09:11	21.17	10-Day Recheck
NIL-255	--	--	Exempt
NIL-256	8/9/2022 19:35	2.86	--
NIL-257	8/9/2022 18:31	2.37	--
NIL-258	--	--	Exempt
NIL-259	8/9/2022 19:01	3.38	--
NIL-260	--	--	Exempt
NIL-261	8/9/2022 18:13	1.52	--
NIL-262	8/9/2022 18:14	2.05	--
NIL-263	--	--	Exempt
NIL-264	8/9/2022 18:23	1.20	--
NIL-266	8/9/2022 18:25	0.55	--
NIL-267	--	--	Exempt
NIL-268	--	--	Exempt
NIL-269	--	--	Exempt
NIL-270	--	--	Exempt
NIL-271	--	--	Exempt
NIL-272	--	--	Exempt

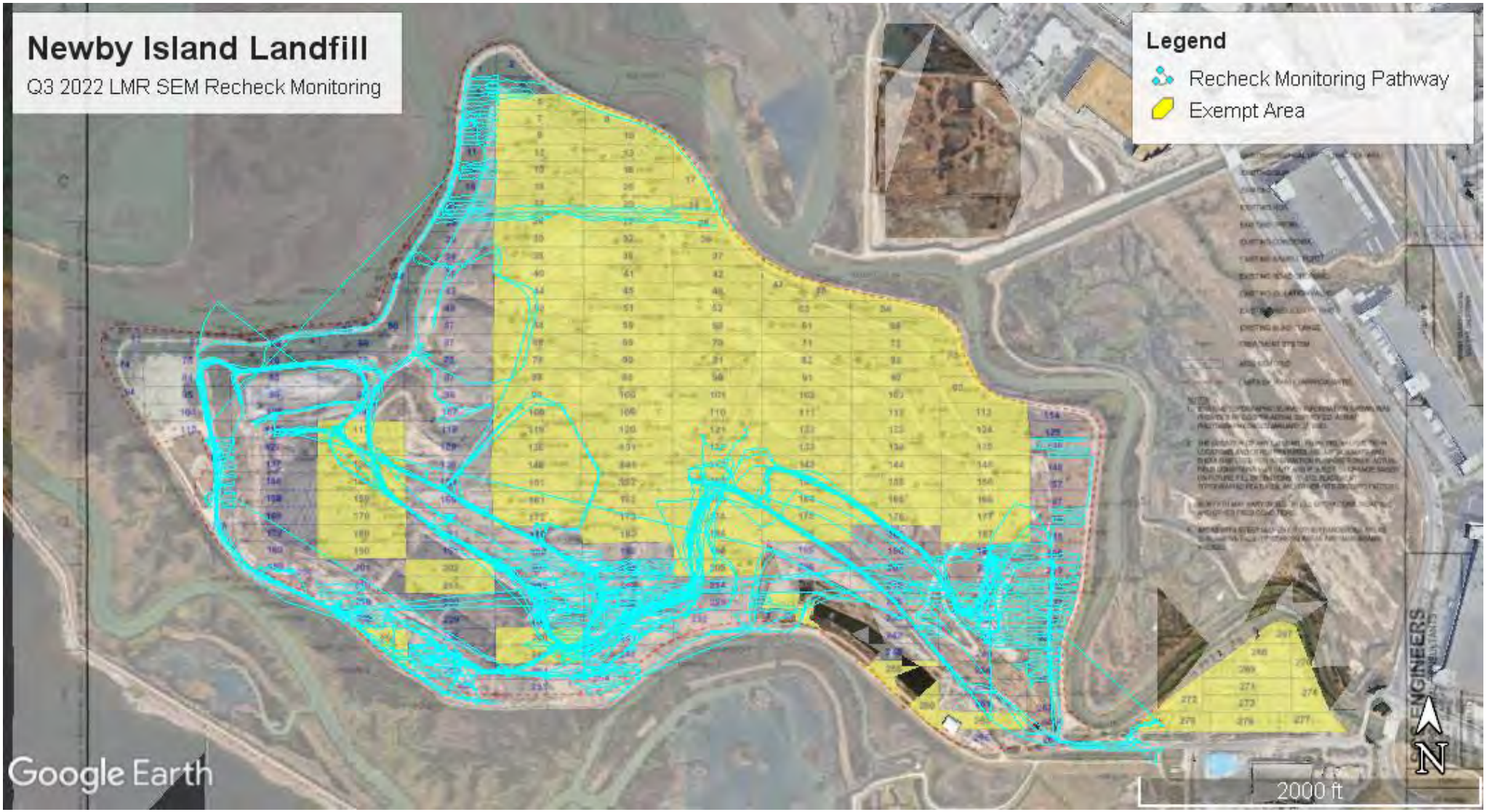
Third Quarter 2022

Table 2. Integrated Surface Emissions Monitoring Results

Newby Island Landfill, Milpitas, California

Point Name	Record Date	FID Concentration (ppm)	Comments
NIL-273	--	--	Exempt
NIL-274	--	--	Exempt
NIL-275	--	--	Exempt
NIL-276	--	--	Exempt
NIL-277	--	--	Exempt





Third Quarter 2022

LMR Surface Emissions Monitoring First and Second 10-Day Pathways

Newby Island Landfill, Milpitas, California

Attachment 5

Calibration Logs

SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA

Date: 8-8-22 Site Name: Newby

Inspector(s): Bryan Ochoa Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 6 MPH Wind Direction: ESE Barometric Pressure: 29.97 "Hg

Air Temperature: ~~6~~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: 5419 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	|Cal Gas Conc.-Cal Gas Reading|	Response Time (seconds)
1	0	501	1	3
2	0	498	2	5
3	0	501	1	4

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:

Counts Observed for the Span= 179524

Counters Observed for the Zero= 4826

Trial 2:

Counts Observed for the Span= 179418

Counters Observed for the Zero= 4770

Trial 3:

Counts Observed for the Span= 176212

Counters Observed for the Zero= 4726

Post Monitoring Calibration Check

Zero Air Reading: 6.1 ppm Cal Gas Reading: 483 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: G163 Reading: 5.8 ppm

Downwind Location Description: Flare Reading: 2.3 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: 8-9-22 Site Name: Newby

Inspector(s): Bryan Ochoa Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 4 MPH Wind Direction: E Barometric Pressure: 30 "Hg

Air Temperature: 61 °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	0.1	501	1	5
2	0	500	0	4
3	-0.1	498	2	6

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= 150060
Counters Observed for the Zero= 4314

Trial 2:
Counts Observed for the Span= 153500
Counters Observed for the Zero= 4248

Trial 3:
Counts Observed for the Span= 153368
Counters Observed for the Zero= 4239

Post Monitoring Calibration Check

Zero Air Reading: -3.8 ppm Cal Gas Reading: 465 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: office Reading: 2.5 ppm

Downwind Location Description: G213 Reading: 2.4 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: 8-9-22 Site Name: Newby

Inspector(s): Diego Romero Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 4 MPH Wind Direction: E Barometric Pressure: 30 "Hg

Air Temperature: 61 °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	0	505	3	6
2	0	499	1	6
3	0	500	0	3

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:

Counts Observed for the Span= 151460

Counters Observed for the Zero= 2561

Trial 2:

Counts Observed for the Span= 157968

Counters Observed for the Zero= 2548

Trial 3:

Counts Observed for the Span= 156600

Counters Observed for the Zero= 2524

Post Monitoring Calibration Check

Zero Air Reading: -3.9 ppm Cal Gas Reading: 489 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Office Reading: 2.5 ppm

Downwind Location Description: G213 Reading: 2.4 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: 8-9-22 Site Name: Newby

Inspector(s): Diego Romero Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 4 MPH Wind Direction: E Barometric Pressure: 30 "Hg

Air Temperature: 61 °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	0	503	3	6
2	-0.1	499	1	1
3	-0.1	499	1	1

Average Difference: 1.6

*Perform recalibration if average difference is greater than 10

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

= 100%- 1.6 /500 x 100%

= 99.6 %

Span Sensitivity:

Trial 1:

Counts Observed for the Span= 136156

Counters Observed for the Zero= 3872

Trial 2:

Counts Observed for the Span= 126229

Counters Observed for the Zero= 3866

Trial 3:

Counts Observed for the Span= 126000

Counters Observed for the Zero= 3854

Post Monitoring Calibration Check

Zero Air Reading: 3.9 ppm Cal Gas Reading: 579 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Office Reading: 2.5 ppm

Downwind Location Description: G 213 Reading: 2.4 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: 8/9/22 Site Name: Newby

Inspector(s): Ricardo Yepez Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 4 MPH Wind Direction: East Barometric Pressure: 30 "Hg

Air Temperature: 61 °F General Weather Conditions: good-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	0	506	6	3
2	0	502	2	4
3	0	500	0	3

Average Difference: 2.6

*Perform recalibration if average difference is greater than 10

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

= 100%- 2.6 /500 x 100%

= 99.4 %

Span Sensitivity:

Trial 1:
Counts Observed for the Span= 125148
Counters Observed for the Zero= 3672

Trial 2:
Counts Observed for the Span= 127224
Counters Observed for the Zero= 3654

Trial 3:
Counts Observed for the Span= 128556
Counters Observed for the Zero= 3650

Post Monitoring Calibration Check

Zero Air Reading: 1.5 ppm Cal Gas Reading: 534 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Office Reading: 2.5 ppm

Downwind Location Description: Grid-213 Reading: 2.4 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: 8/9/22 Site Name: Newby

Inspector(s): R. Rios Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 4 MPH Wind Direction: E Barometric Pressure: 30.00 "Hg

Air Temperature: 61 °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: 2364 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	|Cal Gas Conc.-Cal Gas Reading|	Response Time (seconds)
1	-2.1	506	6	2
2	-0.5	502	2	1
3	-0.2	502	2	1

Average Difference: 3.3

*Perform recalibration if average difference is greater than 10

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

= 100%- 3.3 /500 x 100%

= 99.3 %

Span Sensitivity:

Trial 1:
Counts Observed for the Span= 170836
Counters Observed for the Zero= 5186

Trial 2:
Counts Observed for the Span= 173552
Counters Observed for the Zero= 4300

Trial 3:
Counts Observed for the Span= 174080
Counters Observed for the Zero= 4035

Post Monitoring Calibration Check

Zero Air Reading: 1.2 ppm Cal Gas Reading: 518 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: office Reading: 2.7 ppm

Downwind Location Description: G-213 Reading: 2.5 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

Date: 8-9-22 Site Name: Newby

Inspector(s): Ruben Rios Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 4 MPH Wind Direction: E Barometric Pressure: 30 "Hg

Air Temperature: 61 °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: 1220 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	|Cal Gas Conc.-Cal Gas Reading|	Response Time (seconds)
1	0	502	2	5
2	-0.1	501	1	4
3	-0.1	498	2	3

Average Difference: 1.6

*Perform recalibration if average difference is greater than 10

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

= 100%- 1.6 /500 x 100%

= 99.6 %

Span Sensitivity:

Trial 1:
Counts Observed for the Span= 141476
Counters Observed for the Zero= 3795

Trial 2:
Counts Observed for the Span= 142648
Counters Observed for the Zero= 3761

Trial 3:
Counts Observed for the Span= 144048
Counters Observed for the Zero= 3699

Post Monitoring Calibration Check

Zero Air Reading: 4.6 ppm Cal Gas Reading: 492 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: office Reading: 2.7 ppm

Downwind Location Description: G23 Reading: 2.5 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

Date: 8-9-22 Site Name: Newby

Inspector(s): Emmanuel Paz Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 4 MPH Wind Direction: E Barometric Pressure: 30 "Hg

Air Temperature: 61 °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: 12205419 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	|Cal Gas Conc.-Cal Gas Reading|	Response Time (seconds)
1	0	499	1	5
2	0.1	500	0	4
3	-0.1	498	2	6

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= 191660
Counters Observed for the Zero= 5252

Trial 2:
Counts Observed for the Span= 193368
Counters Observed for the Zero= 5163

Trial 3:
Counts Observed for the Span= 186588
Counters Observed for the Zero= 5070

Post Monitoring Calibration Check

Zero Air Reading: -1.8 ppm Cal Gas Reading: 516 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Office Reading: 2.5 ppm

Downwind Location Description: G23 Reading: 2.4 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: 8/10/22 Site Name: Newby

Inspector(s): [redacted] [redacted] Diego Romero Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 2 MPH Wind Direction: WNW Barometric Pressure: 1017 "Hg

Air Temperature: 57 °F General Weather Conditions: partly 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	-0.1	505	5	5
2	0.0	499	1	3
3	-0.1	500	1	4

Average Difference: 2.3

*Perform recalibration if average difference is greater than 10

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

= 100%- 2.3 /500 x 100%

=99.5 %

Span Sensitivity:

Trial 1:
Counts Observed for the Span= 150508
Counters Observed for the Zero= 4461

Trial 2:
Counts Observed for the Span= 147696
Counters Observed for the Zero= 4425

Trial 3:
Counts Observed for the Span= 147128
Counters Observed for the Zero= 4333

Post Monitoring Calibration Check

Zero Air Reading: 1.5 ppm Cal Gas Reading: 535 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: office Reading: 2.8 ppm

Downwind Location Description: Grid 213 Reading: 2.5 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

Date: 8/10/22 Site Name: Newby

Inspector(s): R. Yepez Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 2 MPH Wind Direction: S Barometric Pressure: 30 "Hg

Air Temperature: 61 °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	-0.1	499	1	1
2	0	497	3	2
3	0	500	0	2

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%

= 99.74 %

Span Sensitivity:

Trial 1:
Counts Observed for the Span= 149648
Counters Observed for the Zero= 2556

Trial 2:
Counts Observed for the Span= 150572
Counters Observed for the Zero= 2491

Trial 3:
Counts Observed for the Span= 150336
Counters Observed for the Zero= 2480

Post Monitoring Calibration Check

Zero Air Reading: 1.2 ppm Cal Gas Reading: 529 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: office Reading: 3.1 ppm

Downwind Location Description: Grid 213 Reading: 2.9 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: 8/10/22 Site Name: Newby

Inspector(s): Emmanuel PQZ Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 2 MPH Wind Direction: S Barometric Pressure: 30 "Hg

Air Temperature: 61 °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	0	495	5	1
2	-0.1	501	1	1
3	-0.1	498	2	1

Average Difference: 2.6

*Perform recalibration if average difference is greater than 10

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

= 100%- 2.6 /500 x 100%

= 99.48 %

Span Sensitivity:

Trial 1:
Counts Observed for the Span= 186704
Counters Observed for the Zero= 4899

Trial 2:
Counts Observed for the Span= 183344
Counters Observed for the Zero= 4892

Trial 3:
Counts Observed for the Span= 182140
Counters Observed for the Zero= 4877

Post Monitoring Calibration Check

Zero Air Reading: 0.9 ppm Cal Gas Reading: 550 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: office Reading: 2.9 ppm

Downwind Location Description: Grid-213 Reading: 3.1 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: 8/10/22 Site Name: Newby

Inspector(s): emmanuel paz Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 2 MPH Wind Direction: "W.N.W" Barometric Pressure: 6017 "Hg

Air Temperature: 57 °F General Weather Conditions: Partly 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: 236A Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	|Cal Gas Conc.-Cal Gas Reading|	Response Time (seconds)
1	-0.3	505	5	5
2	-0.3	506	6	3
3	-0.3	506	6	5

Average Difference: 5.6

*Perform recalibration if average difference is greater than 10

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

= 100%- 5.6 /500 x 100%

= 98.88%

Span Sensitivity:

Trial 1:
Counts Observed for the Span= 173828
Counters Observed for the Zero= 4147

Trial 2:
Counts Observed for the Span= 172900
Counters Observed for the Zero= 4361

Trial 3:
Counts Observed for the Span= 172356
Counters Observed for the Zero= 4321

Post Monitoring Calibration Check

Zero Air Reading: 1.5 ppm Cal Gas Reading: 520 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Office Reading: 32 ppm

Downwind Location Description: Grid-213 Reading: 2.9 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: 8-10-22 Site Name: Newby

Inspector(s): Ruben Rios Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 2 MPH Wind Direction: S Barometric Pressure: 30 "Hg

Air Temperature: 61 °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: 1220 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	|Cal Gas Conc.-Cal Gas Reading|	Response Time (seconds)
1	-0.2	504	4	5
2	-0.1	501	1	6
3	-0-1	501	1	4

Average Difference: 2

*Perform recalibration if average difference is greater than 10

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

= 100%- 2 /500 x 100%

= 99.5 %

Span Sensitivity:

Trial 1:
Counts Observed for the Span= 139216
Counters Observed for the Zero= 3683

Trial 2:
Counts Observed for the Span= 143148
Counters Observed for the Zero= 3605

Trial 3:
Counts Observed for the Span= 142396
Counters Observed for the Zero= 3591

Post Monitoring Calibration Check

Zero Air Reading: 34 ppm Cal Gas Reading: 526 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Grid 73 Reading: 9.1 ppm

Downwind Location Description: Grid 259 Reading: 3.6 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: 8-10-22 Site Name: Newby

Inspector(s): Ricardo Yepez Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 2 MPH Wind Direction: S Barometric Pressure: 30 "Hg

Air Temperature: 61 °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	0	502	2	4
2	-0.1	500	0	6
3	-0.1	501	1	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= 139328
Counters Observed for the Zero= 4127

Trial 2:
Counts Observed for the Span= 136676
Counters Observed for the Zero= 4067

Trial 3:
Counts Observed for the Span= 132925
Counters Observed for the Zero= 4006

Post Monitoring Calibration Check

Zero Air Reading: -26 ppm Cal Gas Reading: 529 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Grid 73 Reading: 7.4 ppm

Downwind Location Description: Grid259 Reading: 3.7 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: 8-10-22 Site Name: Newby

Inspector(s): Bryan Ochoa Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 2 MPH Wind Direction: S Barometric Pressure: 30 "Hg

Air Temperature: 61 °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: 8420 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	|Cal Gas Conc.-Cal Gas Reading|	Response Time (seconds)
1	0	498	2	5
2	0	498	2	4
3	0	501	1	4

Average Difference: 1.6

*Perform recalibration if average difference is greater than 10

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

= 100%- 1.6 /500 x 100%

= 99.6 %

Span Sensitivity:

Trial 1:
Counts Observed for the Span= 124584
Counters Observed for the Zero= 3599

Trial 2:
Counts Observed for the Span= 134120
Counters Observed for the Zero= 3524

Trial 3:
Counts Observed for the Span= 132080
Counters Observed for the Zero= 3526

Post Monitoring Calibration Check

Zero Air Reading: 8.1 ppm Cal Gas Reading: 478 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Grid 73 Reading: 6.8 ppm

Downwind Location Description: Grid 259 Reading: 4.0 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: 8/11/22 Site Name: Lewby

Inspector(s): Emmanel Paz Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 4 MPH Wind Direction: E Barometric Pressure: 30 "Hg

Air Temperature: 61 °F General Weather Conditions: partly 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: 2364 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	|Cal Gas Conc.-Cal Gas Reading|	Response Time (seconds)
1	0	504	4	2
2	0	503	3	2
3	0	502	2	1

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%

= 99.4 %

Span Sensitivity:

Trial 1:
Counts Observed for the Span= 172744
Counters Observed for the Zero= 4632

Trial 2:
Counts Observed for the Span= 188436
Counters Observed for the Zero= 4878

Trial 3:
Counts Observed for the Span= 189108
Counters Observed for the Zero= 4669

Post Monitoring Calibration Check

Zero Air Reading: 1.3 ppm Cal Gas Reading: 509 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Office Reading: 3.0 ppm

Downwind Location Description: Flare Reading: 2.7 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: 8/11/22 Site Name: Newby

Inspector(s): R. Warren Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 4 MPH Wind Direction: E Barometric Pressure: 30 "Hg

Air Temperature: 60 °F General Weather Conditions: partly 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	0	501	1	2
2	-0.1	505	5	1
3		501	1	2

Average Difference: 2.3

*Perform recalibration if average difference is greater than 10

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

= 100%- 2.3 /500 x 100%

= 99.54 %

Span Sensitivity:

Trial 1:
Counts Observed for the Span= 146872
Counters Observed for the Zero= 3804

Trial 2:
Counts Observed for the Span= 144288
Counters Observed for the Zero= 3811

Trial 3:
Counts Observed for the Span= 148344
Counters Observed for the Zero= 3767

Post Monitoring Calibration Check

Zero Air Reading: 1.9 ppm Cal Gas Reading: 513 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: office Reading: 2.3 ppm

Downwind Location Description: Flare Reading: 2.1 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: 8.11.22 Site Name: Newby

Inspector(s): R. Yepez Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 4 MPH Wind Direction: 15 Barometric Pressure: 30 "Hg

Air Temperature: 6 °F General Weather Conditions: partly 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	503	3	1
2	0	500	0	1
3	-0.1	502	2	2

Average Difference: 1.6

*Perform recalibration if average difference is greater than 10

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

= 100%- 1.6 /500 x 100%

= 99.68 %

Span Sensitivity:

Trial 1:
Counts Observed for the Span= 126468
Counters Observed for the Zero= 3798

Trial 2:
Counts Observed for the Span= 128864
Counters Observed for the Zero= 3754

Trial 3:
Counts Observed for the Span= 129236
Counters Observed for the Zero= 3733

Post Monitoring Calibration Check

Zero Air Reading: 1.1 ppm Cal Gas Reading: 527 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Office Reading: 1.9 ppm

Downwind Location Description: Flare 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: 8/11/22 Site Name: Newby

Inspector(s): R. Rios Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 4 MPH Wind Direction: E Barometric Pressure: 30 "Hg

Air Temperature: 60 °F General Weather Conditions: partly 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	-0.1	502	2	1
2	0	498	2	2
3	0	503	3	2

Average Difference: 2.3

*Perform recalibration if average difference is greater than 10

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

= 100%- 2.3 /500 x 100%

= 99.54 %

Span Sensitivity:

Trial 1:
Counts Observed for the Span= 134784
Counters Observed for the Zero= 4222

Trial 2:
Counts Observed for the Span= 135220
Counters Observed for the Zero= 4183

Trial 3:
Counts Observed for the Span= 132104
Counters Observed for the Zero= 4140

Post Monitoring Calibration Check

Zero Air Reading: 2.1 ppm Cal Gas Reading: 531 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: office Reading: 2.1 ppm

Downwind Location Description: flare Reading: 2.3 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: 8-12-22 Site Name: Newby

Inspector(s): ~~Ale~~ Bryan Ochoa Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 6 MPH Wind Direction: S Barometric Pressure: 30.03 "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: 1211 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	|Cal Gas Conc.-Cal Gas Reading|	Response Time (seconds)
1	-0.2	504	4	6
2	-0.1	502	2	5
3		498	2	5

Average Difference: 2.6

*Perform recalibration if average difference is greater than 10

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

= 100%- 2.6 /500 x 100%

= 99.3 %

Span Sensitivity:

Trial 1:

Counts Observed for the Span= 126616

Counters Observed for the Zero= 3924 ~~129240~~

Trial 2:

Counts Observed for the Span= 129240

Counters Observed for the Zero= 3884

Trial 3:

Counts Observed for the Span= 128948

Counters Observed for the Zero= 3837

Post Monitoring Calibration Check

Zero Air Reading: -3.9 ppm Cal Gas Reading: 516 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Flare Reading: 2.7 ppm

Downwind Location Description: Grid 38 Reading: 8.9 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: 8/12/22

Site Name: NEWBIE

Inspector(s): ~~G PAZ~~ Emmanuel Paz

Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 2 MPH

Wind Direction: NE

Barometric Pressure: 30.05 "Hg

Air Temperature: 58 °F

General Weather Conditions: PARTLY 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: 4388

Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	|Cal Gas Conc.-Cal Gas Reading|	Response Time (seconds)
1	-0.2	495	5	3
2	-0.1	498	2	1
3	0.1	499	1	2

Average Difference: 2.6

*Perform recalibration if average difference is greater than 10

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

= 100%- 2.6 /500 x 100%

= 994 %

Span Sensitivity:

Trial 1:

Counts Observed for the Span= 153456

Counters Observed for the Zero= 4051

Trial 2:

Counts Observed for the Span= 153432

Counters Observed for the Zero= 3961

Trial 3:

Counts Observed for the Span= 153040

Counters Observed for the Zero= 3884

Post Monitoring Calibration Check

Zero Air Reading: 4.2 ppm

Cal Gas Reading: 521 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Flare

Reading: 2.3 ppm

Downwind Location Description: G38

Reading: 8.7 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: 8/12/22

Site Name: NEWBIE

Inspector(s): ~~E. Paz~~ Emmanuel Paz

Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 2 MPH

Wind Direction: NE

Barometric Pressure: 30.05 "Hg

Air Temperature: 58 °F

General Weather Conditions: PARTLY 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: 4388

Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	|Cal Gas Conc.-Cal Gas Reading|	Response Time (seconds)
1	-0.2	495	5	3
2	-0.1	498	2	1
3	0.1	499	1	2

Average Difference: 2.6

*Perform recalibration if average difference is greater than 10

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

= 100%- 2.6 /500 x 100%

= 99.4 %

Span Sensitivity:

Trial 1:

Counts Observed for the Span= 153456

Counters Observed for the Zero= 4051

Trial 2:

Counts Observed for the Span= 153432

Counters Observed for the Zero= 3961

Trial 3:

Counts Observed for the Span= 153040

Counters Observed for the Zero= 3884

Post Monitoring Calibration Check

Zero Air Reading: 4.2 ppm

Cal Gas Reading: 521 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Flare

Reading: 2.3 ppm

Downwind Location Description: G38

Reading: 8.7 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: Aug 19, 2022 Site Name: Newby

Inspector(s): Neesha Hernandez Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 6 MPH Wind Direction: S"S" W Barometric Pressure: 10/2 "Hg

Air Temperature: 61 °F General Weather Conditions: Partly 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: 2367 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	|Cal Gas Conc.-Cal Gas Reading|	Response Time (seconds)
1	0.0	500	1	3
2	0.1	513	4	1
3	0.0	501	2	3

Average Difference: 2.3

*Perform recalibration if average difference is greater than 10

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

= 100%- 2.3 /500 x 100%

= 99.9 %

Span Sensitivity:

Trial 1:
Counts Observed for the Span= 164000
Counters Observed for the Zero= 5013

Trial 2:
Counts Observed for the Span= 164912
Counters Observed for the Zero= 5019

Trial 3:
Counts Observed for the Span= 163212
Counters Observed for the Zero= 4947

Post Monitoring Calibration Check

Zero Air Reading: 08 ppm Cal Gas Reading: 544 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Grid 163 Reading: 6.1 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.

SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA

Date: 8-19-22 Site Name: Newby

Inspector(s): Rashad Warren Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 6 MPH Wind Direction: E Barometric Pressure: 29.94 "Hg

Air Temperature: 60 °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	0	502	2	3
2	0	500	0	3
3	-0.1	503	3	3

Average Difference: 1.6

*Perform recalibration if average difference is greater than 10

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

= 100%- 1.6 /500 x 100%

= 99.9 %

Span Sensitivity:

Trial 1:
Counts Observed for the Span= 124416
Counters Observed for the Zero= 3570

Trial 2:
Counts Observed for the Span= 132492
Counters Observed for the Zero= 3523

Trial 3:
Counts Observed for the Span= 130344
Counters Observed for the Zero= 3562

Post Monitoring Calibration Check

Zero Air Reading: 0.3 ppm Cal Gas Reading: 504 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Grid 163 Reading: 7.2 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.

SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA

Date: Aug 19, 2022 Site Name: Newby

Inspector(s): Nicole Hernandez / Alfredo Gomez Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 6 MPH Wind Direction: S,S,W Barometric Pressure: 1012 "Hg

Air Temperature: 61 °F General Weather Conditions: partly 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	0.0	500	1	1
2	0.0	500	1	3
3	0.0	500	1	3

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= 135796	Counts Observed for the Span= 133924
Counters Observed for the Zero= 2998	Counters Observed for the Zero= 2841
Trial 2:	
Counts Observed for the Span= 134972	
Counters Observed for the Zero= 2909	

Post Monitoring Calibration Check

Zero Air Reading: -2.1 ppm Cal Gas Reading: 510 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: GL63 Reading: 7.2 ppm

Downwind Location Description: Plant 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: 8-19-22 Site Name: Newby

Inspector(s): Bryan Ochoa Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 6 MPH Wind Direction: E Barometric Pressure: 29 "Hg

Air Temperature: 60 °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	-0.1	502	2	2
2	0	497	3	3
3	-0.1	501	1	2

Average Difference: 2

*Perform recalibration if average difference is greater than 10

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

= 100%- 2 /500 x 100%

= 99.9%

Span Sensitivity:

Trial 1:
Counts Observed for the Span= 139336
Counters Observed for the Zero= 4085

Trial 2:
Counts Observed for the Span= 139096
Counters Observed for the Zero= 4030

Trial 3:
Counts Observed for the Span= 138484
Counters Observed for the Zero= 3997

Post Monitoring Calibration Check

Zero Air Reading: -1.0 ppm Cal Gas Reading: 502 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: G163 Reading: 6.1 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.

SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA

Date: 8-26-22 Site Name: Newby

Inspector(s): Don Gibson Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 1 MPH Wind Direction: W Barometric Pressure: 29.96 "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: 23604 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	|Cal Gas Conc.-Cal Gas Reading|	Response Time (seconds)
1	-0.1	503	3	1
2	-0.3	504	4	2
3	-0.5	501	1	1

Average Difference: 2.6

*Perform recalibration if average difference is greater than 10

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

= 100%- 2.6 /500 x 100%

= 99.4 %

Span Sensitivity:

Trial 1:
Counts Observed for the Span= 179396
Counters Observed for the Zero= 4202

Trial 2:
Counts Observed for the Span= 176992
Counters Observed for the Zero= 4301

Trial 3:
Counts Observed for the Span= 177312
Counters Observed for the Zero= 4235

Post Monitoring Calibration Check

Zero Air Reading: -0.2 ppm Cal Gas Reading: 492 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Entrance Reading: 2.4 ppm

Downwind Location Description: 2411 Reading: 2.5 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

Date: 8-26-22 Site Name: Newby

Inspector(s): Diego Romero Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 1 MPH Wind Direction: W Barometric Pressure: 29.96 "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: 4388 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	|Cal Gas Conc.-Cal Gas Reading|	Response Time (seconds)
1	0	498	2	1
2	-0.1	501	1	1
3	-0.1	498	2	2

Average Difference: 1.6

*Perform recalibration if average difference is greater than 10

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

= 100%- 1.6 /500 x 100%

= 99.6 %

Span Sensitivity:

Trial 1:
Counts Observed for the Span= 152512
Counters Observed for the Zero= 4058

Trial 2:
Counts Observed for the Span= 153640
Counters Observed for the Zero= 4029

Trial 3:
Counts Observed for the Span= 153008
Counters Observed for the Zero= 3989

Post Monitoring Calibration Check

Zero Air Reading: -0.1 ppm Cal Gas Reading: 478 ppm

BACKGROUND CONCENTRATIONS CHECKS

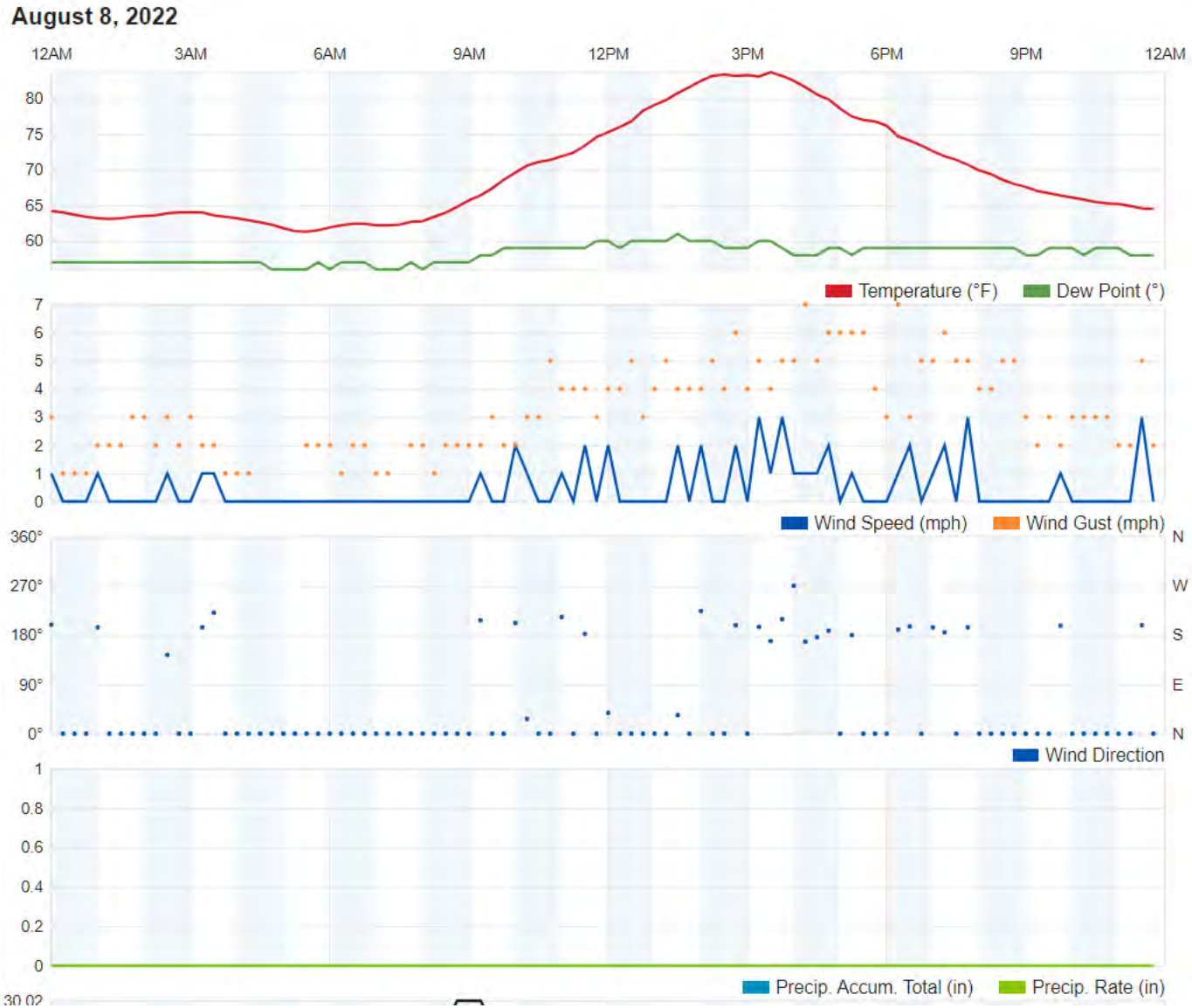
Upwind Location Description: Entrance Reading: 2.4 ppm

Downwind Location Description: 241 Reading: 2.5 ppm

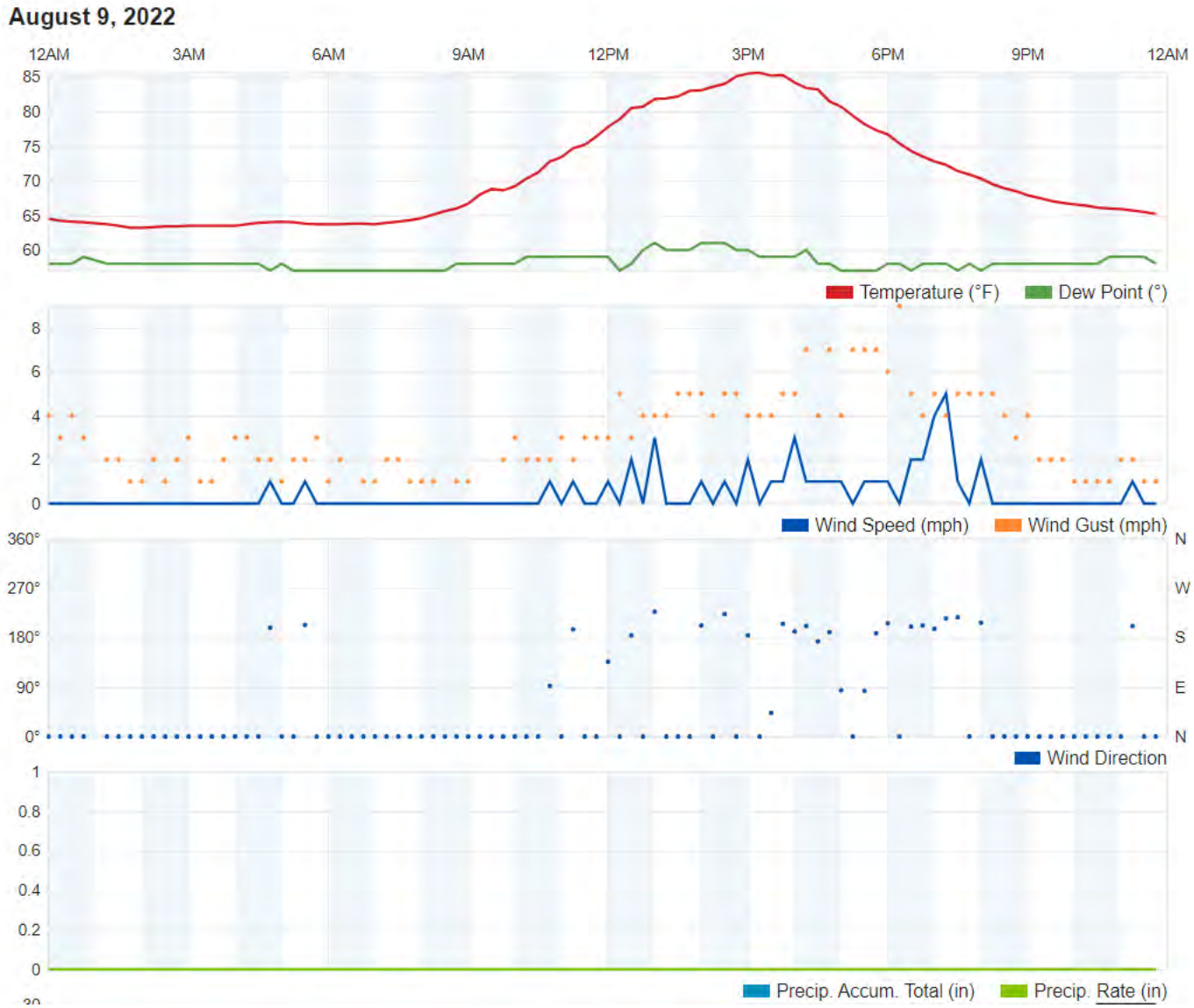
Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested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

Attachment 6

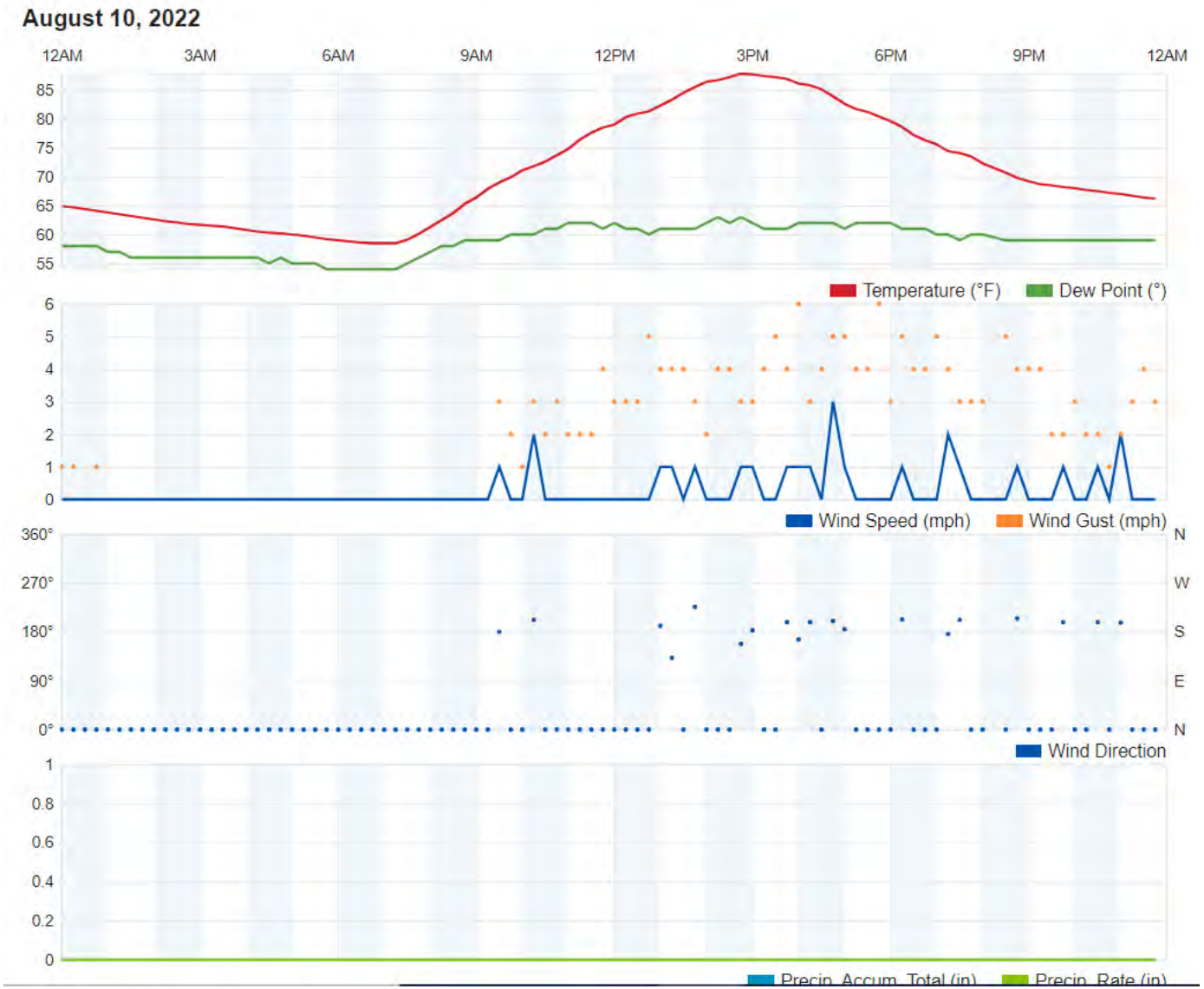
Weather Data



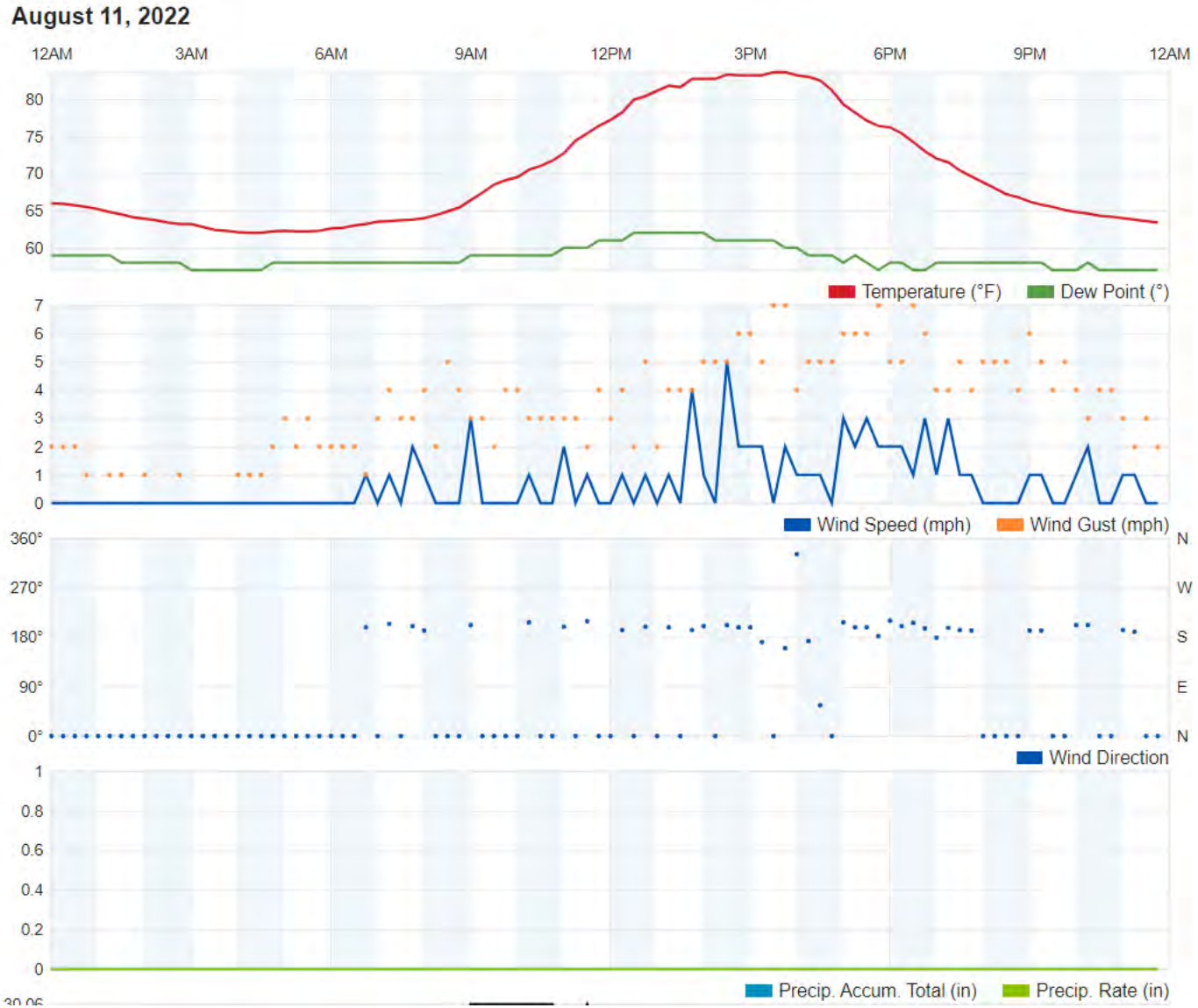
Third Quarter 2022
LMR Surface Emissions Monitoring Weather Data
August 8, 2022
Newby Island Landfill, Milpitas, California



Third Quarter 2022
LMR Surface Emissions Monitoring Weather Data
August 9, 2022
Newby Island Landfill, Milpitas, California



Third Quarter 2022
LMR Surface Emissions Monitoring Weather Data
August 10, 2022
Newby Island Landfill, Milpitas, California

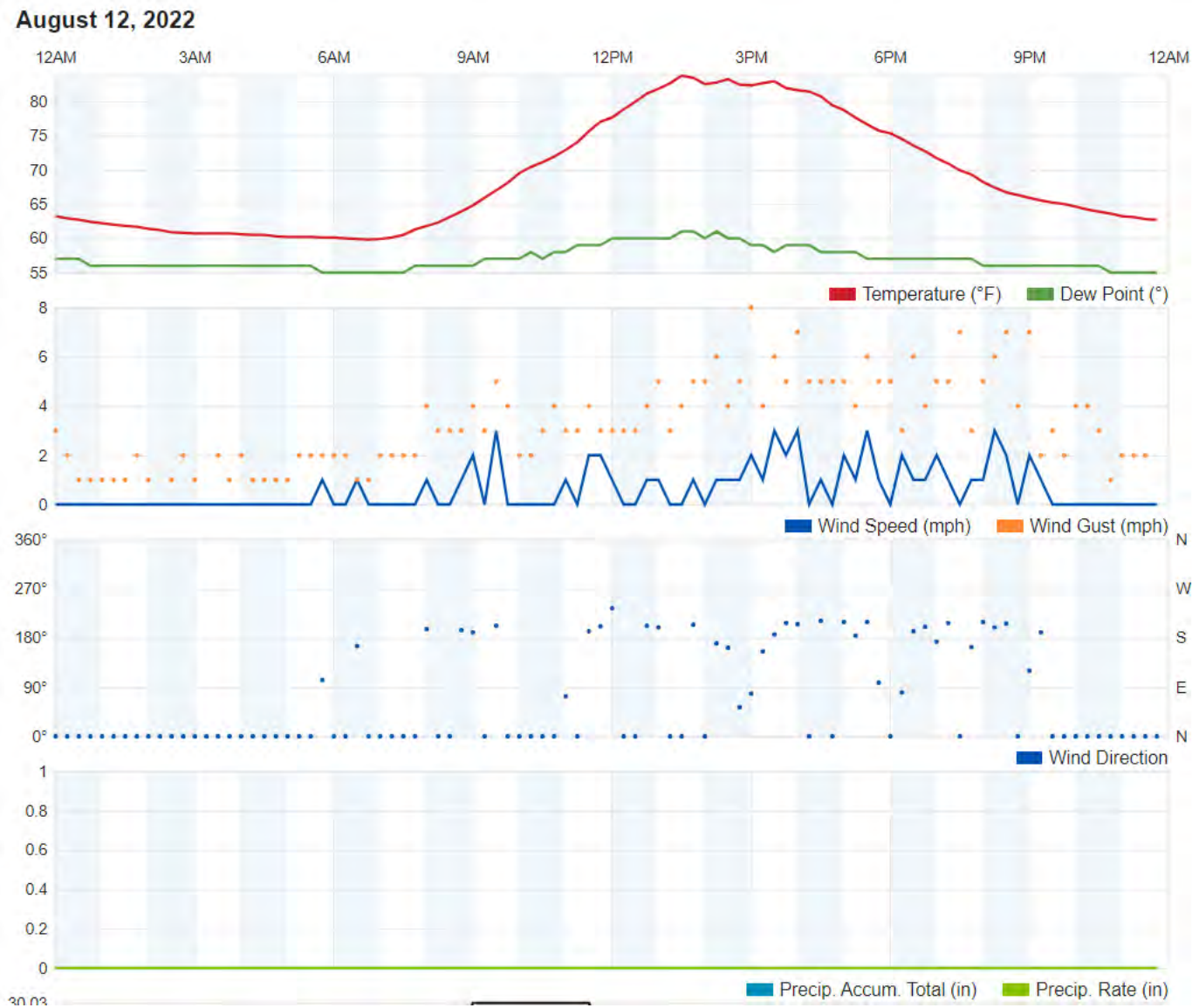


Third Quarter 2022

LMR Surface Emissions Monitoring Weather Data

August 11, 2022

Newby Island Landfill, Milpitas, California

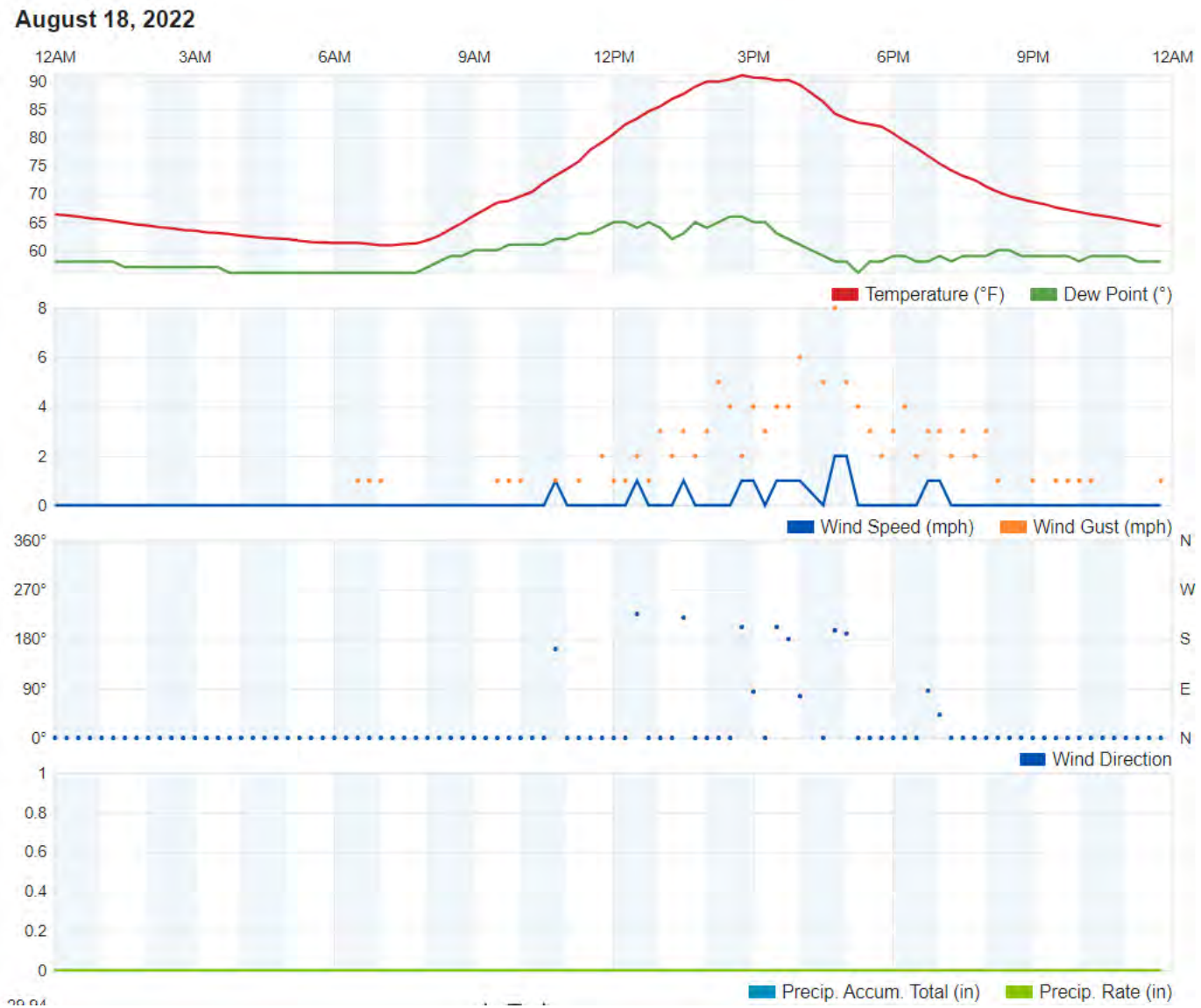


Third Quarter 2022

LMR Surface Emissions Monitoring Weather Data

August 12, 2022

Newby Island Landfill, Milpitas, California

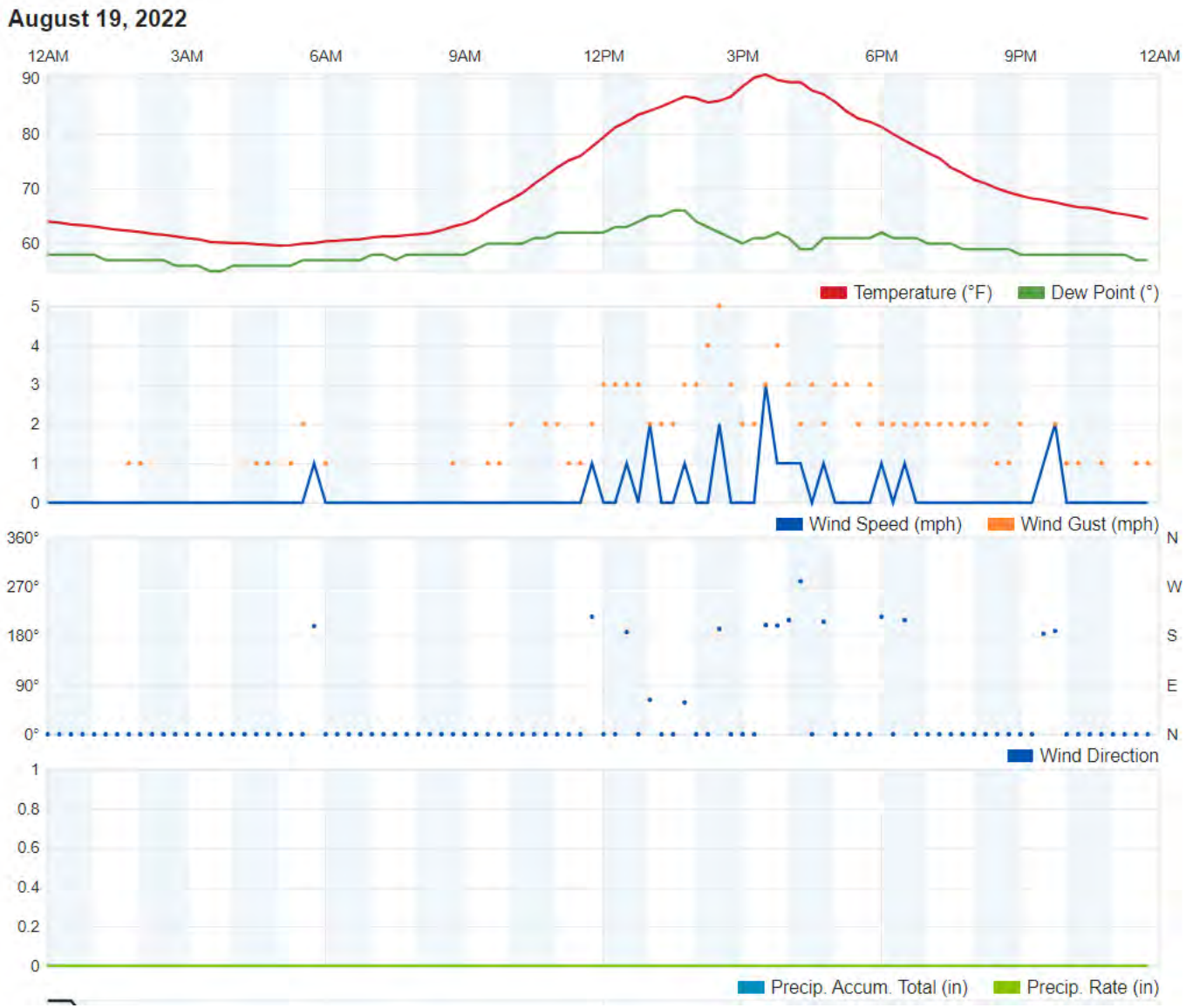


Third Quarter 2022

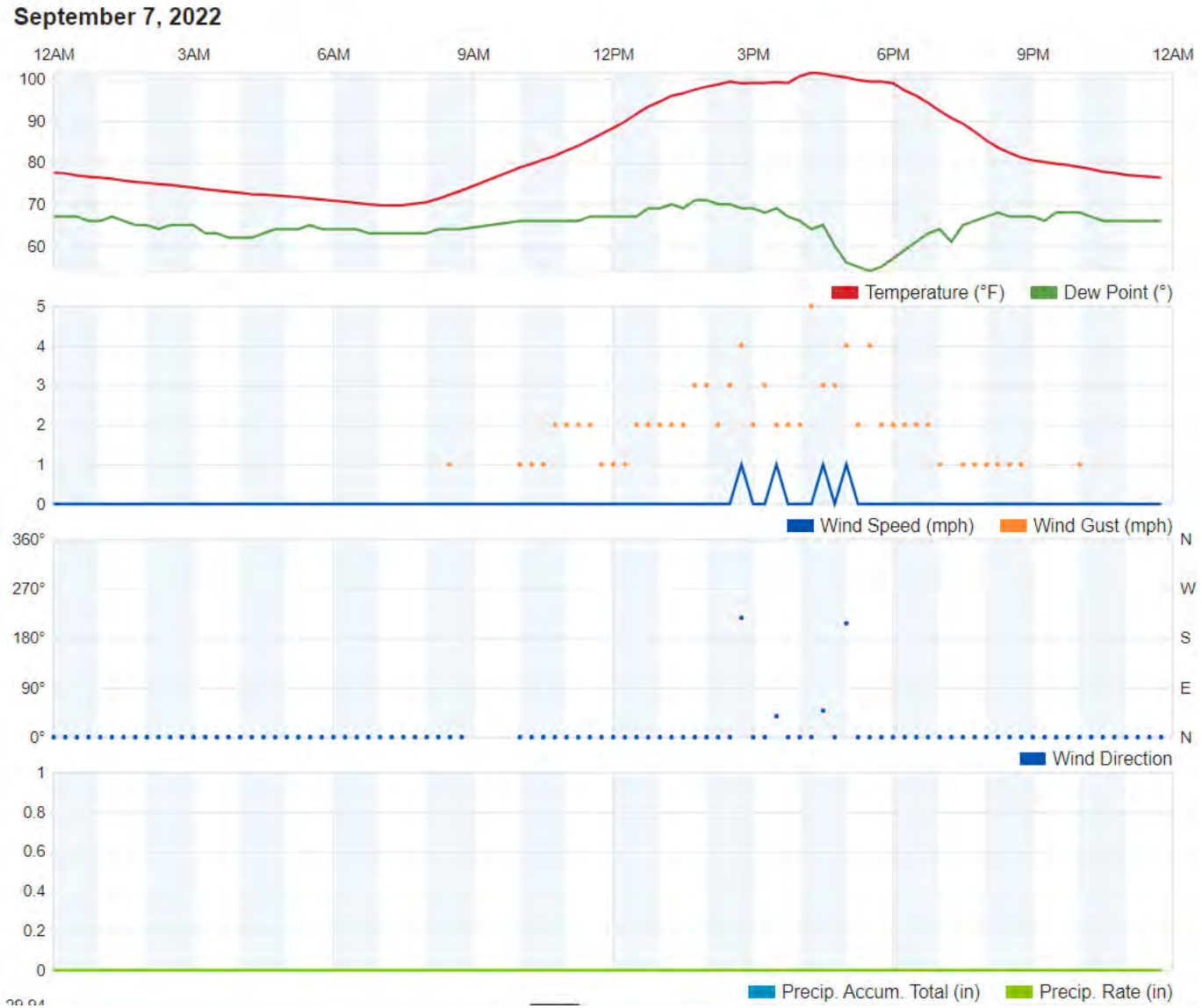
LMR Surface Emissions Monitoring Weather Data

August 18, 2022

Newby Island Landfill, Milpitas, California



Third Quarter 2022
LMR Surface Emissions Monitoring Weather Data
August 19, 2022
Newby Island Landfill, Milpitas, California



Third Quarter 2022

LMR Surface Emissions Monitoring Weather Data

September 7, 2022

Newby Island Landfill, Milpitas, California

Appendix D – Well Exceedance Documentation

Root Cause Analysis and Corrective Action Analysis Forms

TEMPERATURE EXCEEDANCE

Root Cause Analysis

Date of Initial Exceedance:	6/17/2022
Collection Device ID:	NILEW701
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?	☐ Yes	☒ No
• 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.		
HOV submitted to air board. Waiting approval.		
Was the temperature exceedance remediated within 60 days since the initial exceedance?	☐ Yes	☒ No
• 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:	11/11/2022
Collection Device ID:	NILEW701
Temperature Reading:	134.0

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?	☐ Yes	☒ No
• 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.		
HOV submitted to air board. Waiting approval.		
Was the temperature exceedance remediated within 60 days since the initial exceedance?	☒ Yes	☐ No
• 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:	11/22/2022
Collection Device ID:	NILEW476
Temperature Reading:	131.6

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?	☐ Yes	☒ No
• 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.		
HOV submitted to air board. Waiting approval.		
Was the temperature exceedance remediated within 60 days since the initial exceedance?	☒ Yes	☐ No
• 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:	12/29/2022
Collection Device ID:	NILEW740
Pressure Reading:	0.63

Root Cause Analysis		
Was the reason for the positive pressure due to one of the following:		
A fire or increased well temperature.	☐ Yes	☒ No
Use of a geomembrane or synthetic cover.	☐ Yes	☒ No
A decommissioned well.	☐ Yes	☒ No
• 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 H2S drum obstructed on vacuum lateral.		
Determine the required next steps.		
Was the positive pressure remediated within 60 days since the initial exceedance?	☒ Yes	☐ No
• 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.		

75-Day Notification Letters
(including relevant Higher Operating Value requests)

Newby Island Landfill 1601 Dixon Landing Road, Milpitas, CA 95035
o 408.586.2263 c 510.298.7892 republicservices.com

August 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 Temperature 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 Landfill (Newby), located in Milpitas, California, hereby provides the Bay Area Air Quality Management District (BAAQMD or District) with a 75-day notification pursuant to the compliance provisions identified in Title 40 of the Code of Federal Regulations (CFR) Section 60.767(j)(2) for a temperature exceedance at NILEW701.

Well NILEW701 had an initial temperature exceedance of 131.0 degrees Fahrenheit (°F) on June 17, 2022. Corrective actions were initiated within 5 days as the valve was adjusted; however, the well could not be brought back into compliance within 15 days.

As required under 40 CFR 60.765(a)(5), a root cause analysis and a corrective action analysis and implementation schedule were completed within 60 days from the original exceedance. Copies of these forms are attached. All the steps for compliance were conducted, however, the well remain in exceedance but will be remediated prior to the 120-day deadline. As such, this 75-day notification is required.

On February 6, 2020, IDCC submitted higher operating value (HOV) requests to operate NILEW701 at a temperature of 145°F to the United States Environmental Protection Agency (USEPA). IDCC has received conditional approval from the BAAQMD pending approval from 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, August 2021, and October 2021 but no response has been received. The USEPA promulgated the revised National Emission Standards for Hazardous Air Pollutants (NESHAP) Subpart AAAA rules, which took effect on September 27, 2021. In the revised NESHAP rule, the USEPA allows an operating temperature of 145^{o}F, the same temperature as requested with the HOV which was conditionally approved by BAAQMD. Moreover, the federal rules clearly state that the NESHAP provisions under Subpart AAAA replace the major compliance provisions of Subpart XXX, including wellhead temperature requirements. We believe this implicates USEPA approval of a higher temperature of 145^{o}F and that the HOV is approved by both USEPA and BAAQMD. Thus, this notification should not be required, however to be conservative and because the 131^{o}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 Sean Bass 209-345-2458 or by email at SBass@scsengineers.com.

Sincerely,

Rachelle Huber
Environmental Manager
Newby Island Landfill

cc: Josh Mills, Newby Island
Ben Wade, Newby Island
Sean Bass, SCS Field Services
Maria Bowen, SCS Engineers
Jay Patel, BAAQMD
Administrator, U.S. EPA Region 9

Attachment A: Root Cause Analysis Form and Corrective Action Analysis and Implementation Schedule Form
Attachment B: Temperature HOV Request

Attachment A:
Root Cause Analysis Form and
Corrective Action Analysis and Implementation Schedule Form

TEMPERATURE EXCEEDANCE

Root Cause Analysis

Date of Initial Exceedance:	6/17/2022
Collection Device ID:	NILEW701
Temperature Reading:	131.0

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?	☐ Yes	☒ No
• 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.		
HOV submitted to air board. Waiting approval.		
Was the temperature exceedance remediated within 60 days since the initial exceedance?	☐ Yes	☒ No
• 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:	6/17/2022
Collection Device ID:	NILEW701
Temperature Reading:	131.0

Corrective Action Analysis
Describe the corrective actions taken to remediate exceedance.
O&M to reduced applied vacuum to well
HOV letter sent to air district. Awaiting approval.

Implementation Schedule	
Expected Start Date:	4/25/2022
Expected Completion Date:	6/25/2022
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?	☒ Yes	☐No

- 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.

Attachment B:
Temperature HOV Request

REPUBLIC SERVICES

Newby Island Landfill 1601 Dixon Landing Road, Milpitas, CA 95035
o 408.262.1401 f 408.270.8992 republicservices.com

February 6, 2020

Ms. Roshni Brahmbhatt
Air Enforcement Section Manager
USEPA, Region IX
75 Hawthorne Street
San Francisco, CA 94105

Re: Temperature Higher Operating Value (HOV) Request for Four Landfill Gas Wells
Newby Island Sanitary Landfill and Recyclery, Milpitas, California
Plant Number A9013

Dear Ms. Brahmbhatt:

Tetra Tech, on behalf of the International Disposal Corporation of California, Inc. (IDCC), submits this application to the United States Environmental Protection Agency (USEPA), Region IX, to operate four vertical landfill gas (LFG) extraction wells at a temperature higher operating value (HOV) of 145 degrees Fahrenheit (°F) at the Newby Island Sanitary Landfill and Recyclery (Newby Island). Pursuant to New Source Performance Standards/Emissions Guidelines (NSPS/EG), it is required that wellhead temperature levels remain below 131°F. Moreover, pursuant to NSPS Subpart XXX Section 60.763, a HOV demonstration must be submitted to the Administrator for approval.

Newby Island is regulated under the NSPS, based upon a design capacity exceeding 2.5 million Megagrams (Mg) and 2.5 million cubic meters, and based upon a non-methane organic compounds (NMOC) emission rate calculation, which demonstrated an annual NMOC emission rate exceeding 34 Mg per year. Effective September 1, 2019, the gas collection and control system (GCCS) at Newby Island became subject to the monitoring and reporting requirements of NSPS Subpart XXX since it commenced construction, reconstruction, or modification after July 17, 2014. An update of Newby Island's GCCS Design Plan to include NSPS Subpart XXX requirements was submitted to the Bay Area Air Quality Management District (BAAQMD) and USEPA on March 6, 2018.

Per previous correspondence with the BAAQMD Permit Engineer assigned to Newby Island, the BAAQMD has not received delegation from the USEPA for NSPS Subpart XXX. Therefore, the BAAQMD cannot issue exemptions from the regulation for standards, monitoring, or reporting. Thus, IDCC requests an increase of the allowable wellhead temperature limit from 131°F to 145°F for the following four vertical LFG extraction wells:

Well ID
NILEW690
NILEW691
NILEW701
NILEW703

Background

The following discussion on the relationship between LFG production and temperatures will serve to justify this request for higher temperatures for these wells under NSPS XXX.

Decomposition of the waste occurs in four stages. During the first two stages, decomposition of the waste occurs aerobically. Aerobic decomposition is exothermic (i.e. heat is produced). The degree of the exothermic reaction is governed by the ambient air temperatures during waste placement, the amount of moisture present, the types of waste deposited, etc. The heat generated during the aerobic phases sets the stage for the types of anaerobic bacteria populations that flourish during later decomposition phases.

There are three types of anaerobic bacterial populations which produce LFG. Methane producing bacteria are called methanogens. The psychrophilic bacteria (organisms that are capable of growth in low temperatures) are found at temperatures below 59°F. This population produces the least amount of LFG and is not normally found in landfills in North America. Methanogens that generate LFG at temperatures below 110°F are known as mesophilic bacteria, while those that generate gas at temperatures in excess of 110°F are called thermophilic bacteria. The mesophilic bacteria predominate in most of the landfills in North America, with the exception of those found in the southernmost states. Therefore, it is not uncommon to find normal LFG temperatures in excess of 140°F to 160°F. It is also not uncommon to find pockets of thermophilic bacteria in any landfill, based on the conditions which existed during waste placement.

The vertical LFG extraction wells NILEW690, NILEW691, NILEW701, and NILEW703 have exhibited elevated readings on a consistent basis. However, the wells are viable and important to the GCCS at Newby Island to collect LFG produced by the Source-2 (S-2) landfill. As vacuum increases at the wells, temperature is projected to increase as well. Tetra Tech operations and maintenance (O&M) personnel have been tuning the wells to prevent prolonged temperature exceedances. As a result, the ability to pull vacuum on these wells has been limited due to the current temperature limit of 131°F. A new temperature limit of 145°F is being requested as it is believed that the wells will be able to operate at their full potential, allowing optimal LFG production and mitigating potential surface emissions. Based on previous attempts by O&M personnel to bring these wells back within allowable temperature parameters, it was concluded that without temperature being the limiting factor, the gas collection efficiency of these wells would greatly improve.

Additionally, carbon monoxide (CO) samples were taken at each well via Draeger tubes and results indicated extremely low levels of CO at each of the four wells (0 to 10 parts per million by volume [ppmv]), indicating that no SSO is occurring. CO concentrations of 500 ppmv or greater indicate likely SSOs, while concentrations between 100 and 499 ppmv would indicate concerns of SSOs. CO sample results are included in this application as Attachment A and in the table below.

Well ID	CO Sample (ppmv)
NILEW690	0
NILEW691	10
NILEW701	0
NILEW703	0

HOV Request

IDCC requests an HOV for temperature for the four vertical LFG extraction wells identified herein be increased from the standard 131°F to 145°F, as decommissioning these viable vertical LFG extraction wells due to elevated temperature readings above the NSPS limit of 131°F would be counterproductive. Additionally, IDCC requests the Newby Island Title V Permit Condition Number 10423 Part 6(d)(i) be altered to include Wells NILEW690, NILEW691, NILEW701, and NILEW703. Historical data for these four vertical LFG extraction wells is included in this application as Attachment B.

A Title V Permit Renewal Application was submitted to the BAAQMD on June 19, 2017. As IDCC is currently awaiting a renewed Title V Permit for Newby Island, including NSPS Subpart XXX requirements, this request is being submitted to obtain approval for an HOV of 145°F to allow LFG extraction wells NILEW690, NILEW691, NILEW701, and NILEW703 to continue operation, while remaining in compliance with permitted limits. In addition, a temperature HOV request for the aforementioned wells to be approved under NSPS Subpart WWW and BAAQMD Regulation 8-34 was also submitted to the BAAQMD.

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 Meghan Caesar at (925) 241-1074 or by email at meghan.caesar@tetratech.com.

Sincerely,

Rachelle Huber

Rachelle Huber
Environmental Manager
Newby Island Landfill

Attachments: Attachment A – CO Sample Results
Attachment B – Historical Wellfield Data
Attachment C - Site Map

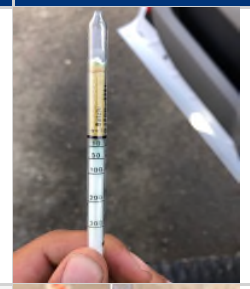
cc: Anthony Boccaleoni, IDCC
Rachelle Huber, IDCC
Jennifer Baker, BEL-Engineering
Meghan Caesar, Tetra Tech
Maria Bowen, Tetra Tech
Tamiko Endow, BAAQMD
Mark Sims, USEPA Region IX

Attachment A
CO Sample Results

TETRA TECH

Draeger Tubes

Newby Island

Point ID	Date	Chemical Tested For	Approximate Concentration	Concentration Units	Draeger Notes	Technician	Image
NILEW701	11/7/2019 3:58:58 PM	CO	0	ppm		Mike Yes	
NILEW690	11/7/2019 3:46:09 PM	CO	0	ppm		Mike Yes	
NILEW703	11/7/2019 3:50:10 PM	CO	0	ppm		Mike Yes	
NILEW691	12/17/2019 5:23:30 PM	CO	10	ppm		Jorge Contreras	

Attachment B
Historical Wellfield Data

HOV HISTORICAL WELLFIELD DATA

as of February 6, 2020

Point ID	Record Date	CH4 [%]	CO2 [%]	O2 [%]	Bal Gas [%]	Init Temp [°F]	Init Static Press ["H2O]	Sys Pressure ["H2O]	Init Flow [scfm]	Comments
NILEW690	11/4/2019 2:18:50 PM	57.4	42.6	0.0	0.0	121.0	54.10	-42.57	2.31	Valve Adjustment:"";Well Comment:"First reading on new well";Well Condition:"";Well Repairs:""
NILEW690	11/4/2019 2:30:32 PM	57.4	42.6	0.0	0.0	115.0	57.81	-43.67	1.58	Valve Adjustment:"Opened valve >10%,Valve 15% open";Well Condition:"";Well Repairs:""
NILEW690	11/4/2019 2:32:06 PM	57.2	42.8	0.0	0.0	130.0	28.34	-43.67	18.68	Valve Adjustment:"No change,Valve 15% open";Well Condition:"";Well Repairs:""
NILEW690	11/4/2019 4:46:32 PM	57.3	42.7	0.0	0.0	139.0	25.38	-44.30	18.01	Valve Adjustment:"Opened valve >10%,Valve 30% open";Well Condition:"";Well Repairs:""
NILEW690	11/4/2019 4:50:23 PM	57.0	43.0	0.0	0.0	139.0	12.20	-42.57	21.27	Valve Adjustment:"NSPS/CAI,No change,Valve 30% open";Well Condition:"";Well Repairs:""
NILEW690	11/5/2019 4:42:35 PM	58.1	41.9	0.0	0.0	139.0	8.19	-39.59	22.54	Valve Adjustment:"NSPS/CAI,Opened valve 10% or less,Valve 30% open";Well Condition:"";Well Repairs:""
NILEW690	11/5/2019 4:44:09 PM	58.4	41.6	0.0	0.0	139.0	-1.19	-39.88	26.31	Valve Adjustment:"NSPS/CAI,No change,Valve 30% open";Well Condition:"";Well Repairs:""
NILEW690	11/19/2019 3:39:41 PM	59.4	39.8	0.0	0.8	136.0	8.57	-34.24	27.03	Valve Adjustment:"NSPS/CAI,Opened valve 10% or less,Valve 40% open";Well Condition:"";Well Repairs:""
NILEW690	11/19/2019 3:41:02 PM	59.3	39.8	0.0	0.9	137.0	-1.57	-34.96	32.90	Valve Adjustment:"NSPS/CAI,No change,Valve 40% open";Well Condition:"";Well Repairs:""
NILEW690	12/2/2019 3:16:43 PM	58.3	39.4	0.0	2.3	132.3	-7.09	-42.49	26.65	Valve Adjustment:"NSPS/CAI,Opened valve 10% or less,Valve 50% open";Well Condition:"";Well Repairs:""
NILEW690	12/2/2019 3:18:09 PM	58.6	39.7	0.0	1.7	132.4	-15.88	-40.98	30.25	Valve Adjustment:"NSPS/CAI,No change,Valve 50% open";Well Condition:"";Well Repairs:""
NILEW690	12/16/2019 3:28:42 PM	57.1	40.3	0.0	2.6	133.8	-19.68	-40.05	28.56	Valve Adjustment:"NSPS/CAI,Opened valve 10% or less,Valve 60% open";Well Condition:"";Well Repairs:""
NILEW690	12/16/2019 3:30:24 PM	57.9	40.3	0.0	1.8	133.7	-22.51	-40.81	29.47	Valve Adjustment:"NSPS/CAI,No change,Valve 60% open";Well Condition:"";Well Repairs:""
NILEW690	1/6/2020 10:21:41 AM	58.5	39.3	0.0	2.2	135.1	-23.99	-40.34	27.56	Valve Adjustment:"NSPS/CAI,Opened valve 10% or less,Valve 70% open";Well Condition:"";Well Repairs:""
NILEW690	1/6/2020 10:22:51 AM	58.7	39.4	0.0	1.9	135.1	-23.99	-38.28	26.42	Valve Adjustment:"NSPS/CAI";Well Condition:"";Well Repairs:""
NILEW690	1/21/2020 1:30:44 PM	53.9	36.3	1.9	7.9	134.8	-23.31	-37.90	27.75	Valve Adjustment:"NSPS/CAI,Closed valve 10% or less,Valve 70% open";Well Condition:"";Well Repairs:""
NILEW690	1/21/2020 1:32:17 PM	54.0	35.9	1.9	8.2	134.6	-22.97	-39.00	29.79	Valve Adjustment:"NSPS/CAI";Well Condition:"";Well Repairs:""
NILEW690	2/4/2020 3:46:55 PM	59.5	39.8	0.1	0.6	134.6	-19.73	-35.36	28.98	Valve Adjustment:"Opened valve 10% or less,Valve 80% open";Well Condition:"";Well Repairs:""
NILEW690	2/4/2020 3:48:17 PM	59.5	39.9	0.1	0.5	134.4	-19.82	-34.06	27.88	Valve Adjustment:"No change,Valve 80% open";Well Condition:"";Well Repairs:""
NILEW691	10/30/2019 11:19:08 AM	59.9	40.1	0.0	0.0	93.0	5.46	-16.50	0.22	Valve Adjustment:"No change,Valve at minimum position";Well Comment:"first reading on new well ";Well Condition:"";Well Repairs:""
NILEW691	10/30/2019 11:32:10 AM	59.8	40.2	0.0	0.0	93.0	5.46	-17.13	0.27	Valve Adjustment:"Opened valve >10%,Valve 40% open";Well Condition:"";Well Repairs:""
NILEW691	10/30/2019 11:35:43 AM	60.0	40.0	0.0	0.0	112.0	2.74	-15.86	10.40	Valve Adjustment:"No change,Valve 40% open";Well Condition:"";Well Repairs:""
NILEW691	10/30/2019 1:20:24 PM	59.7	40.3	0.0	0.0	120.0	2.50	-15.48	4.02	Valve Adjustment:"Opened valve >10%,Valve 40% open";Well Condition:"";Well Repairs:""
NILEW691	10/30/2019 1:23:28 PM	59.6	40.4	0.0	0.0	120.0	1.26	-14.42	7.87	Valve Adjustment:"No change,Valve 40% open";Well Condition:"";Well Repairs:""
NILEW691	10/31/2019 11:27:07 AM	59.5	40.5	0.0	0.0	110.0	0.40	-20.27	3.25	Valve Adjustment:"Opened valve 10% or less,Valve 35% open";Well Condition:"";Well Repairs:""
NILEW691	10/31/2019 11:29:24 AM	60.0	40.0	0.0	0.0	110.0	-0.37	-20.36	6.64	Valve Adjustment:"No change,Valve 35% open";Well Condition:"";Well Repairs:""
NILEW691	11/8/2019 3:19:27 PM	61.6	38.4	0.0	0.0	112.0	-0.57	-28.37	31.01	Valve Adjustment:"Opened valve 10% or less,Valve 45% open";Well Condition:"";Well Repairs:""
NILEW691	11/22/2019 2:32:14 PM	59.8	38.4	0.5	1.3	108.0	-4.92	-30.11	49.16	Valve Adjustment:"Opened valve 10% or less,Valve 50% open";Well Condition:"";Well Repairs:""
NILEW691	11/22/2019 2:34:26 PM	59.8	39.0	0.4	0.8	108.0	-7.64	-32.27	64.14	Valve Adjustment:"No change,Valve 50% open";Well Condition:"";Well Repairs:""
NILEW691	12/10/2019 11:55:02 AM	57.0	39.3	0.0	3.7	130.8	-8.78	-28.02	53.69	Valve Adjustment:"NSPS/CAI,Opened valve 10% or less,Valve 60% open";Well Condition:"";Well Repairs:""
NILEW691	12/10/2019 11:57:32 AM	57.2	39.5	0.0	3.3	131.2	-11.61	-25.96	67.05	Valve Adjustment:"NSPS/CAI,No change,Valve 60% open";Well Condition:"";Well Repairs:""
NILEW691	12/12/2019 2:38:06 PM	59.2	40.8	0.0	0.0	133.0	-12.97	-27.48	64.17	Valve Adjustment:"NSPS/CAI,No change,Valve 60% open";Well Condition:"";Well Repairs:""
NILEW691	12/23/2019 2:35:53 PM	60.8	39.1	0.1	0.0	132.6	-15.53	-32.78	72.07	Valve Adjustment:"NSPS/CAI,Opened valve 10% or less,Valve 70% open";Well Condition:"";Well Repairs:""
NILEW691	12/23/2019 2:38:24 PM	59.9	39.7	0.1	0.3	132.8	-16.38	-32.87	78.76	Valve Adjustment:"NSPS/CAI,No change,Valve 70% open";Well Condition:"";Well Repairs:""
NILEW691	1/9/2020 11:56:41 AM	57.2	39.1	0.1	3.6	132.1	-17.65	-34.12	77.91	Valve Adjustment:"NSPS/CAI,Closed valve 10% or less,Valve 60% open";Well Condition:"";Well Repairs:""
NILEW691	1/9/2020 11:57:52 AM	57.3	39.2	0.0	3.5	132.1	-16.55	-33.02	71.92	Valve Adjustment:"NSPS/CAI";Well Condition:"";Well Repairs:""
NILEW691	1/23/2020 2:53:44 PM	61	38.9	0	0.1	130.3	-13.48	-29.05	70.09	Valve Adjustment:"Opened valve 10% or less,Valve 70% open";Well Condition:"";Well Repairs:""
NILEW691	1/23/2020 2:55:37 PM	58.1	36.7	0	5.2	130.3	-14.51	-28.8	76.93	Valve Adjustment:"No change,Valve 70% open";Well Condition:"";Well Repairs:""
NILEW691	1/29/2020 2:38:09 PM	54.6	37.2	0.2	8	132.3	-13.79	-28.19	77.61	Valve Adjustment:"NSPS/CAI,Opened valve 10% or less,Valve 80% open";Well Condition:"";Well Repairs:""
NILEW691	1/29/2020 2:39:35 PM	58.2	38	0.1	3.7	132.4	-14.52	-25.93	81.46	Valve Adjustment:"NSPS/CAI";Well Condition:"";Well Repairs:""
NILEW701	10/25/2019 3:04:16 PM	45.4	31.8	4.5	18.3	101.0	1.21	-17.96	16.32	Valve Adjustment:"No change,Valve at minimum position";Well Comment:"First reading on new well";Well Condition:"";Well Repairs:""
NILEW701	10/25/2019 3:07:37 PM	45.7	32.1	4.3	17.9	101.0	1.26	-19.02	18.28	Valve Adjustment:"Valve at minimum position,Opened valve 10% or less";Well Condition:"";Well Repairs:""
NILEW701	10/25/2019 3:12:16 PM	58.0	42.0	0.0	0.0	116.0	-0.35	-16.58	9.84	Valve Adjustment:"No change,Valve at minimum position";Well Condition:"";Well Repairs:""
NILEW701	10/25/2019 4:28:56 PM	58.1	41.9	0.0	0.0	115.0	-1.29	-17.29	9.66	Valve Adjustment:"Opened valve 10% or less,Valve 5% open";Well Condition:"";Well Repairs:""
NILEW701	11/5/2019 10:21:34 AM	52.1	40.8	0.0	7.1	136.0	-8.49	-16.41	17.79	Valve Adjustment:"NSPS/CAI,No change,Valve 5% open";Well Condition:"";Well Repairs:""
NILEW701	11/5/2019 10:22:57 AM	52.0	40.9	0.0	7.1	136.0	-8.49	-17.75	24.82	Valve Adjustment:"NSPS/CAI,No change,Valve 5% open";Well Condition:"";Well Repairs:""
NILEW701	11/19/2019 3:17:39 PM	57.3	41.7	0.0	1.0	132.0	2.30	-34.79	9.50	Valve Adjustment:"NSPS/CAI,Opened valve >10%,Valve 20% open";Well Condition:"";Well Repairs:""
NILEW701	11/19/2019 3:19:38 PM	57.6	41.4	0.0	1.0	136.0	-1.92	-34.67	18.35	Valve Adjustment:"NSPS/CAI,No change,Valve 20% open";Well Condition:"";Well Repairs:""
NILEW701	12/2/2019 2:54:21 PM	57.0	40.4	0.0	2.6	141.2	-9.97	-43.00	17.48	Valve Adjustment:"NSPS/CAI,Valve 20% open";Well Condition:"";Well Repairs:""
NILEW701	12/2/2019 2:55:44 PM	57.1	40.2	0.0	2.7	141.2	-10.22	-42.87	17.75	Valve Adjustment:"NSPS/CAI,No change,Valve 20% open";Well Condition:"";Well Repairs:""
NILEW701	12/16/2019 3:12:01 PM	57.6	40.8	0.0	1.6	141.6	-8.87	-41.61	17.59	Valve Adjustment:"NSPS/CAI,Opened valve 10% or less,Valve 25% open";Well Condition:"";Well Repairs:""
NILEW701	12/16/2019 3:13:18 PM	58.1	40.5	0.0	1.4	141.9	-11.02	-40.89	19.43	Valve Adjustment:"NSPS/CAI,No change,Valve 25% open";Well Condition:"";Well Repairs:""

HOV HISTORICAL WELLFIELD DATA

as of February 6, 2020

NILEW701	1/6/2020 10:01:46 AM	57.2	39.3	0.0	3.5	146.3	-11.82	-37.11	15.81	Valve Adjustment:"NSPS/CAI,Closed valve 10% or less,Valve 15% open";Well Condition:"";Well Repairs:""
NILEW701	1/6/2020 10:03:03 AM	58.4	39.5	0.0	2.1	144.9	-8.11	-36.68	10.56	Valve Adjustment:"NSPS/CAI";Well Condition:"";Well Repairs:""
NILEW701	1/21/2020 12:08:01 PM	54.9	37.7	1.0	6.4	144.5	-10.39	-35.84	18.94	Valve Adjustment:"NSPS/CAI,Closed valve 10% or less,Valve 20% open";Well Condition:"";Well Repairs:""
NILEW701	1/21/2020 12:09:20 PM	55.3	37.9	0.9	5.9	144.0	-8.70	-35.38	16.63	Valve Adjustment:"NSPS/CAI";Well Condition:"";Well Repairs:""
NILEW701	2/4/2020 4:03:42 PM	59.2	40.8	0	0	144.3	-7.45	-34.94	17.68	Valve Adjustment:"NSPS/CAI,Closed valve 10% or less,Valve 10% open";Well Condition:"";Well Repairs:""
NILEW701	2/4/2020 4:05:33 PM	58.9	41.1	0	0	143.2	-3.27	-34.56	11.92	Valve Adjustment:"NSPS/CAI";Well Condition:"";Well Repairs:""
NILEW703	10/25/2019 12:56:03 PM	56.9	40.7	0.0	2.4	131.3	14.74	-15.73	6.21	Valve Adjustment:"No change,Valve at minimum position";Well Comment:"First reading on new well";Well Condition:"";Well Repairs:""
NILEW703	10/25/2019 1:09:19 PM	56.9	40.5	0.0	2.6	131.3	14.82	-16.91	6.63	Valve Adjustment:"NSPS/CAI,Opened valve >10%,Valve 60% open";Well Condition:"";Well Repairs:""
NILEW703	10/25/2019 1:11:27 PM	56.6	40.8	0.0	2.6	135.0	-0.12	-27.89	35.11	Valve Adjustment:"No change,Valve 60% open";Well Condition:"";Well Repairs:""
NILEW703	10/25/2019 4:11:36 PM	58.3	41.7	0.0	0.0	135.2	-2.86	-22.09	73.44	Valve Adjustment:"Opened valve 10% or less,Valve 70% open";Well Condition:"";Well Repairs:""
NILEW703	11/5/2019 10:04:16 AM	57.0	42.2	0.0	0.8	135.0	-4.58	-18.89	70.95	Valve Adjustment:"NSPS/CAI,Opened valve 10% or less,Valve 75% open";Well Condition:"";Well Repairs:""
NILEW703	11/5/2019 10:06:11 AM	57.1	42.7	0.0	0.2	135.0	-4.39	-18.30	74.17	Valve Adjustment:"NSPS/CAI,Opened valve 10% or less,Valve 80% open";Well Condition:"";Well Repairs:""
NILEW703	11/19/2019 3:27:54 PM	57.9	41.0	0.0	1.1	118.0	14.95	-37.95	3.03	Valve Adjustment:"NSPS/CAI,Opened valve >10%,Valve 60% open";Well Condition:"";Well Repairs:""
NILEW703	11/19/2019 3:29:14 PM	58.0	41.0	0.0	1.0	133.0	-1.92	-47.41	105.72	Valve Adjustment:"NSPS/CAI,No change,Valve 60% open";Well Condition:"";Well Repairs:""
NILEW703	12/2/2019 3:01:22 PM	54.2	39.4	0.0	6.4	130.0	-12.50	-54.14	101.22	Valve Adjustment:"No change,Valve 60% open";Well Condition:"";Well Repairs:""
NILEW703	12/16/2019 3:18:58 PM	54.5	39.6	0.0	5.9	129.7	-11.36	-52.59	103.38	Valve Adjustment:"No change,Valve 60% open";Well Condition:"";Well Repairs:""
NILEW703	1/6/2020 10:10:02 AM	53.8	38.5	0.0	7.7	131.9	-9.46	-44.51	93.28	Valve Adjustment:"NSPS/CAI,Closed valve 10% or less,Valve 50% open";Well Condition:"";Well Repairs:""
NILEW703	1/6/2020 10:11:16 AM	53.5	38.2	0.0	8.3	132.3	-6.80	-46.66	74.42	Valve Adjustment:"NSPS/CAI";Well Condition:"";Well Repairs:""
NILEW703	1/20/2020 2:45:01 PM	55.6	38.7	0.6	5.1	132.1	-8.45	-48.04	94.83	Valve Adjustment:"NSPS/CAI,Closed valve 10% or less,Valve 50% open";Well Condition:"";Well Repairs:""
NILEW703	1/20/2020 2:46:23 PM	56.9	39.4	0.3	3.4	132.4	-5.41	-48.80	78.19	Valve Adjustment:"NSPS/CAI";Well Condition:"";Well Repairs:""
NILEW703	2/4/2020 3:57:31 PM	58.9	40.8	0.0	0.3	132.1	-4.36	-45.87	76.08	Valve Adjustment:"NSPS/CAI,Opened valve 10% or less,Valve 60% open";Well Condition:"";Well Repairs:""
NILEW703	2/4/2020 3:58:50 PM	58.7	41.3	0.0	0.0	131.7	-7.80	-46.04	96.06	Valve Adjustment:"NSPS/CAI";Well Condition:"";Well Repairs:""

Attachment C
Site Map

LEGEND

- EXISTING 10' CONTOUR
- 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)
- EXISTING HORIZONTAL GAS COLLECTOR
- EXISTING GAS HEADER LINE, ON GRADE, SIZE VARIES
- EXISTING GAS HEADER LINE, BELOW GRADE, SIZE VARIES
- EXISTING SIDE SLOPE COLLECTOR
- EXISTING ROAD CROSSING
- EXISTING VALVE
- EXISTING BLIND FLANGE
- EXISTING FLANGE CONNECTION
- EXISTING REDUCER
- EXISTING CAPPED PIPE
- EXISTING REMOTE WELLHEAD
- EW-536 EXISTING SHALLOW LFG EXTRACTION WELL
- EXISTING REMOTE WELLHEAD MANIFOLD
- LEW-13 EXISTING LEACHATE EXTRACTION WELL
- CS-8 EXISTING CONDENSATE SUMP

N

0 250 500
SCALE IN FEET

WELL MANIFOLD DECOM EW-11R EW-30RR EW-72R EW-217R

WELL MANIFOLD DECOM DECOM DECOM DECOM DECOM DECOM 413

WELL MANIFOLD DECOM HC-220 EW-595 EW-592

WELL MANIFOLD EW-630 EW-632 EW-633

WELL MANIFOLD HC-218 HC-217 HC-216 EW-592 HC-237

WELL MANIFOLD HC-227 EW-590 HC-228 HC-229 EW-591

WELL MANIFOLD HC-223 DECOM DECOM

WELL MANIFOLD DECOM DECOM DECOM DECOM DECOM DECOM EW-228

FLARE STATION

TANK FARM

SEE SHEET 1B FOR ENLARGED PLAN VIEW OF THIS AREA

NOTES:

1. THE 2019 BASE TOPOGRAPHIC MAP WAS CREATED BY COOPER AERIAL SURVEYS CO. USING PHOTOGRAMMETRIC METHODS. DATE OF PHOTOGRAPHY: JANUARY 21, 2019. SUPPLEMENTAL TOPOGRAPHIC MAP PROVIDED BY RJA AND ASSOCIATES. DATE OF SURVEY: APRIL 9, 2019. HORIZONTAL DATUM: NAD27, ZONE 3, VERTICAL DATUM: LOCAL LANDFILL DATUM.
2. THE 2010 BASE AS-BUILT WELL AND PIPE LOCATIONS WERE PROVIDED BY REPUBLIC. 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 LOCATION OF WELLS EW-500 AND EW-505 PROVIDED BY REPUBLIC ON NOVEMBER 27, 2018.
4. THE 2017 GCCS AS-BUILT WELL AND PIPE LOCATIONS WERE PROVIDED BY RUGGERI, JENSEN, AZAR AND ASSOCIATES, DATES OF SURVEY: JANUARY 11, 20, AND FEBRUARY 24, 2017.
5. THE 2018 PHASE I GCCS IMPROVEMENTS PER SURVEY PREPARED BY RUGGERI, JENSEN, AZAR, AND ASSOCIATES, DATE OF SURVEY: MARCH 14, 2018.
6. THE 2018 PHASE II GCCS IMPROVEMENTS PER SURVEY PREPARED BY RUGGERI, JENSEN, AZAR, AND ASSOCIATES, DATE OF SURVEY: AUGUST 6, 2018.
7. THE 2018 PHASE III GCCS IMPROVEMENTS PER SURVEY PREPARED BY RUGGERI, JENSEN, AZAR, AND ASSOCIATES, DATE OF SURVEYS: JANUARY 18 AND MARCH 1, 2019.

ISSUED FOR CONSTRUCTION

REV	DATE	DESCRIPTION	DWN BY	DES BY	CHK BY	APP BY

DATE OF ISSUE AUG. 2019
DRAWN BY MDC
DESIGNED BY AMN
CHECKED BY GLC
APPROVED BY PJS

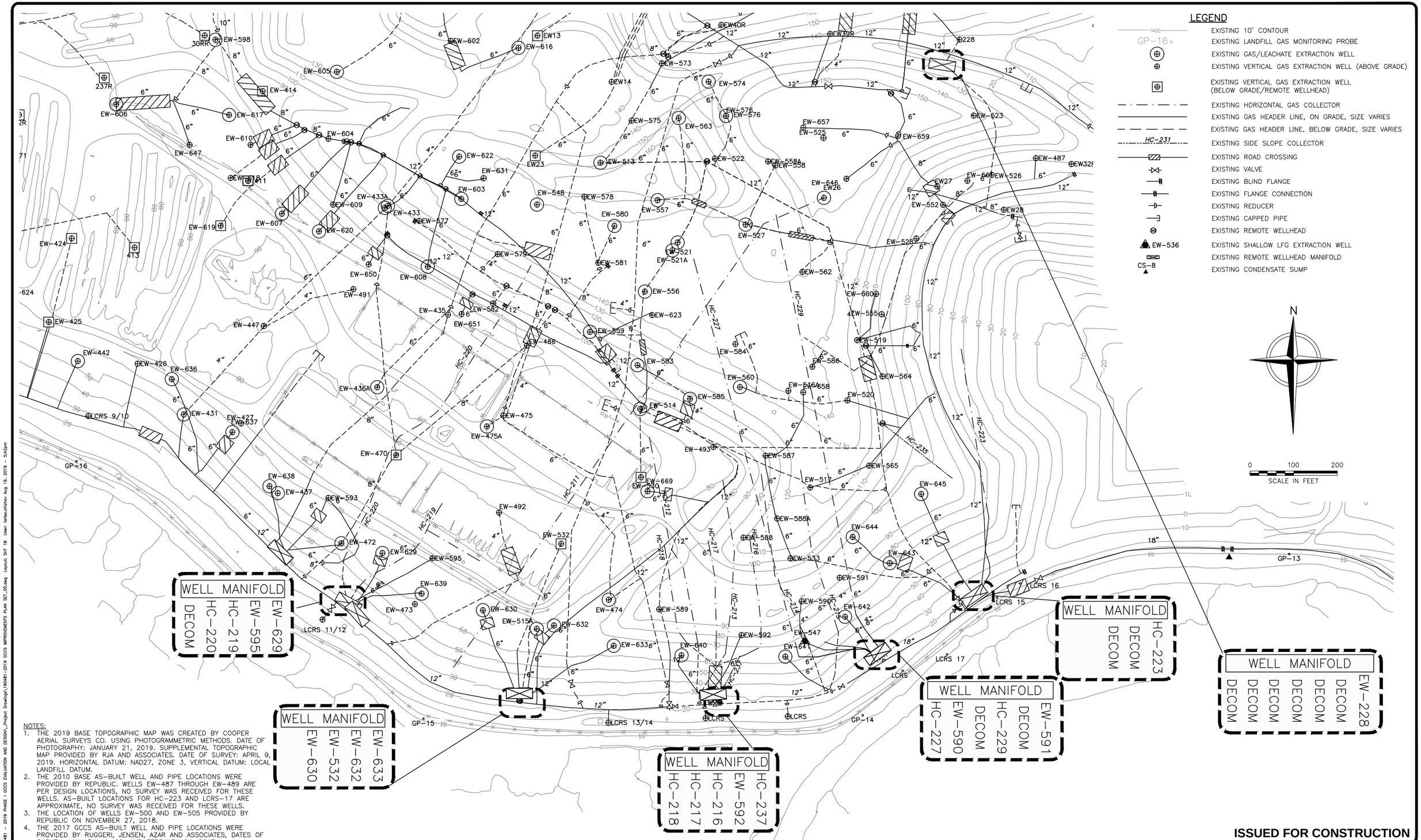
cornerstone
A TETRA TECH COMPANY

NEWBY ISLAND LANDFILL
SANTA CLARA COUNTY, CALIFORNIA

2019 GCCS IMPROVEMENTS
GCCS AS-BUILT SITE PLAN

SHEET NO. **1A**
PROJECT NO. 190481

1" 1/2" 0" 1"



LEGEND

- EXISTING 10' CONTOUR
- 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)
- EXISTING HORIZONTAL GAS COLLECTOR
- EXISTING GAS HEADER LINE, ON GRADE, SIZE VARIES
- EXISTING GAS HEADER LINE, BELOW GRADE, SIZE VARIES
- HC-231 EXISTING SIDE SLOPE COLLECTOR
- EXISTING ROAD CROSSING
- EXISTING VALVE
- EXISTING BLIND FLANGE
- EXISTING FLANGE CONNECTION
- EXISTING REDUCER
- EXISTING CAPPED PIPE
- EXISTING REMOTE WELLHEAD
- EW-536 EXISTING SHALLOW LFG EXTRACTION WELL
- CS-8 EXISTING REMOTE WELLHEAD MANIFOLD
- EXISTING CONDENSATE SUMP

NOTES:

1. THE 2019 BASE TOPOGRAPHIC MAP WAS CREATED BY COOPER AERIAL SURVEYS CO. USING PHOTOGRAMMETRIC METHODS. DATE OF PHOTOGRAPHY: JANUARY 21, 2019. SUPPLEMENTAL TOPOGRAPHIC MAP PROVIDED BY RJA AND ASSOCIATES. DATE OF SURVEY: APRIL 9, 2019. HORIZONTAL DATUM: NAD27, ZONE 3, VERTICAL DATUM: LOCAL LANDFILL DATUM.
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ISSUED FOR CONSTRUCTION

REV	DATE	DESCRIPTION	DWN BY	DES BY	CHK BY	APP BY

DATE OF ISSUE: AUG. 2019
DRAWN BY: MDC
DESIGNED BY: AMN
CHECKED BY: GLC
APPROVED BY: PJS

cornerstone
A TETRA TECH COMPANY

NEWBY ISLAND LANDFILL
SANTA CLARA COUNTY, CALIFORNIA

2019 GCCS IMPROVEMENTS
GCCS AS-BUILT SITE PLAN

SHEET NO. **1B**
PROJECT NO. 190481

Newby Island Landfill 1601 Dixon Landing Road, Milpitas, CA 95035
o 408.586.2263 c 510.298.7892 republicservices.com

January 10, 2023

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 Landfill (Newby), located in Milpitas, California, hereby provides the Bay Area Air Quality Management District (BAAQMD or District) with a 75-day notification pursuant to the compliance provisions identified in Title 40 of the Code of Federal Regulations (CFR) Section 60.767(j)(2) for a pressure exceedance at NILEW803.

The initial pressure exceedance occurred at NILEW803 on October 12, 2022. The well had an initial positive pressure reading of 0.74 inches water column ("H_2O). Corrective actions were initiated within 5 days as the valve was 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. Copies of these forms are attached. All the steps for compliance were conducted, however, NILEW803 remains in exceedance as of submittal of this notification. As such, this 75-day notification is required. The well will be remediated prior to the 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 Sean Bass at (209)-345-2458 or by email at SBass@scsengineers.com.

Sincerely,

Rachelle Huber
Environmental Manager
Newby Island Landfill

cc:
Ben Wade, Newby Island

Sean Bass, SCS Field Services
Maria Bowen, SCS Engineers
Aleah Zapf, BAAQMD
Administrator, U.S. EPA Region 9

Attachment A: Root Cause Analysis Form and Corrective Action Analysis and Implementation Schedule Form

Attachment A:
Root Cause Analysis Form and
Corrective Action Analysis and Implementation Schedule Form

PRESSURE EXCEEDANCE

Root Cause Analysis

Date of Initial Exceedance:	10/12/2022
Collection Device ID:	NILEW803
Pressure Reading:	0.74

Root Cause Analysis		
Was the reason for the positive pressure due to one of the following:		
A fire or increased well temperature.	☐ Yes	☒ No
Use of a geomembrane or synthetic cover.	☐ Yes	☒ No
A decommissioned well.	☐ Yes	☒ No
• 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 H2S drum obstructed on vacuum lateral.		
Determine the required next steps.		
Was the positive pressure remediated within 60 days since the initial exceedance?	☐ Yes	☒ No
• 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:	10/12/2022
Collection Device ID:	NILEW803
Pressure Reading:	0.74

Corrective Action Analysis
Describe the corrective actions taken to remediate exceedance.
Wellhead and vacuum lateral inspected and positive pressure is due to H2S treatment drum obstructed on lateral to this well.

Implementation Schedule	
Expected Start Date:	1/3/2022
Expected Completion Date:	2/8/2022
Provide a description of proposed repairs and/or remedial action required and supporting information for implementation timeframe.	
New H2S drum has been ordered and awaiting arrival to site to mediate issue.	

Final Steps		
Determine the required next steps.		
Is the remediation expected to take **less than 120 days** since initial exceedance per implementation schedule?	☒ Yes	☐ No
• 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

January 10, 2023

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 Landfill (Newby), located in Milpitas, California, hereby provides the Bay Area Air Quality Management District (BAAQMD or District) with a 75-day notification pursuant to the compliance provisions identified in Title 40 of the Code of Federal Regulations (CFR) Section 60.767(j)(2) for a pressure exceedance at NILEW620.

The initial pressure exceedance occurred at NILEW620 on October 26, 2022. The well had an initial positive pressure reading of 0.11 inches water column ("H_2O). Corrective actions were initiated within 5 days as the valve was 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. Copies of these forms are attached. All the steps for compliance were conducted, however, NILEW620 remains in exceedance as of submittal of this notification. As such, this 75-day notification is required. The well will be remediated prior to the 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 Sean Bass at (209)-345-2458 or by email at SBass@scsengineers.com.

Sincerely,

Rachelle Huber
Environmental Manager
Newby Island Landfill

cc:
Ben Wade, Newby Island

Sean Bass, SCS Field Services
Maria Bowen, SCS Engineers
Aleah Zapf, BAAQMD
Administrator, U.S. EPA Region 9

Attachment A: Root Cause Analysis Form and Corrective Action Analysis and Implementation Schedule Form

Attachment A:
Root Cause Analysis Form and
Corrective Action Analysis and Implementation Schedule Form

PRESSURE EXCEEDANCE

Root Cause Analysis

Date of Initial Exceedance:	10/26/2022
Collection Device ID:	NILEW620
Pressure Reading:	0.11

Root Cause Analysis		
Was the reason for the positive pressure due to one of the following:		
A fire or increased well temperature.	☐ Yes	☒ No
Use of a geomembrane or synthetic cover.	☐ Yes	☒ No
A decommissioned well.	☐ Yes	☒ No
• 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 H2S drum obstructed on vacuum lateral.		
Determine the required next steps.		
Was the positive pressure remediated within 60 days since the initial exceedance?	☐ Yes	☒ No
• 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:	10/26/2022
Collection Device ID:	NILEW620
Pressure Reading:	0.11

Corrective Action Analysis
Describe the corrective actions taken to remediate exceedance.
Wellhead and vacuum lateral inspected and positive pressure is due to H2S treatment drum obstructed on lateral to this well.

Implementation Schedule	
Expected Start Date:	1/3/2022
Expected Completion Date:	2/22/2022
Provide a description of proposed repairs and/or remedial action required and supporting information for implementation timeframe.	
New H2S drum has been ordered and awaiting arrival to site to mediate issue.	

Final Steps		
Determine the required next steps.		
Is the remediation expected to take **less than 120 days** since initial exceedance per implementation schedule?	☒ Yes	☐ No
• 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.		

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: *from* 08/01/2022	*through* 01/31/2023

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:

Signature of Responsible Official

2/28/2023

Date

Kevin Divincenzo

Name of Responsible Official (please print)

Area President

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: *from* 08/01/2022	*through* 01/31/2023

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 expires August 1, 2023 but has not yet been incorporated into the Title V permit. All conditions have been reviewed for 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

During the compilation of this report, no deviations from the permit conditions listed above were discovered.

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, on how to comply with the following permit conditions as the site does not have full autonomy of the equipment. IDCC followed up with the BAAQMD for recommendations on how to comply with these conditions under these circumstances. As of submittal of this report, no recommendation has been provided by the BAAQMD.

- Condition 27446 Part 10
    - Part 10: Within 30 days after the end of every calendar year, the owner/operator shall provide a year-end summary of the total hours of operation or fuel usage for S-1057 for the previous 12 months. Please note the S-1057 engine did not run in 2022.

- Condition 27447 Part 2 and 3
    - Part 2: The owner/operator shall properly install, operate, and maintain a non-resettable totalizing meter to measure hours of operation and shall also record actual fuel usage at each engine, S-1055 and S-1056.
    - Part 3: The owner/operator shall ensure both engines S-1055 and S-1056 comply with the NOx and CO emission limits in Regulation 9-8-304.2, and each calendar quarter, the owner/operator shall monitor to ensure that both engines comply with these emissions limits, in accordance with Regulation 9-8-503.

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.

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* 08/01/2022 *through* 01/31/2023

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	There were unplanned shutdowns of the gas collection and control system (GCCS) that did not meet the exemption criteria in BAAQMD Rule 8-34-113. These events were reported to the BAAQMD as reportable compliance activities (RCA) and breakdown relief was requested. These events occurred on the following dates:

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* 08/01/2022 *through* 01/31/2023

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
							• August 3, 2022 (IDs 08K68 and 08K69) – high flow • August 5, 2022 (IDs 08K80 and 08K81 – high flow) • August 7, 2022 (IDs 08K84 and 08K85 – high flow) • September 5, 2022 (IDs 08L46 and 08L47 – Variable Frequency Drive [VFD] malfunction) • September 6, 2022 (IDs 08L63 and 08L64 – utility outage • September 15, 2022 (IDs 08L86 and 08L87 – flame failure • October 6, 2022 (IDs 08M37 and 08M38 – air compressor leak) • October 9, 2022 (IDs 08M51 and 08M52 – liquids accumulation) • October 19, 2022 (IDs 08M62 and 08M63 – liquids accumulation) • December 1, 2022 (IDs 08N89 and 08N90 – utility outage) • December 10, 2022 (IDs 08P09 and 08P10 – low flow) • December 11, 2022 (IDs 08P12 and

NEWBY ISLAND LANDFILL

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
							08P13 – oxygen intrusion) • December 13, 2022 (IDs 08P14 and 08P15 – low flow) The following Notices of Violation (NOV) were issued to IDCC by the BAAQMD site inspector on the dates noted below for an alleged failure to operate the GCCS continuously: • October 14, 2022: NOVsA61616 in response to RCA ID 08K84 / 08K85 • October 14, 2022: NOV A61617 in response to RCA ID 08L46 / 08L47 • October 14, 2022: NOV A61618 in response to RCA ID 08L63 / 08L64 • January 11, 2023: NOV A59759 in response to RCA ID 08H21 / 08H22 • January 11, 2023: NOV A61622 in response to RCA ID 08N89 / 08N90 • January 26, 2023: NOV A61625 in response to RCA ID 08P12 / 08P13 • January 26, 2023: NOV A61626 in response to RCA ID 08P14 / 08P15 For additional information, including corrective actions taken, please refer to the

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* 08/01/2022 *through* 01/31/2023

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
							corresponding 10/30-Day Combined Deviation Letters and NOV Response Letters submitted to BAAQMD within the required timeframes.
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

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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
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
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 ^{o}C (< 131 ^{o}F), except for components identified in Condition # 818, Part 3b(i)	Continuous	N/A

NEWBY ISLAND LANDFILL

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
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
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

NEWBY ISLAND LANDFILL

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 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)	O2 < 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	Intermittent	See section 8-34-117
Well Shutdown Limits	BAAQMD 8-34-116.5 and 501.1	Records	Periodic / Daily	BAAQMD 8-34-116.3	< 24 hours per well	Intermittent	See section 8-34-117

NEWBY ISLAND LANDFILL

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
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	Intermittent	Several wells were temporarily disconnected from the GCCS due to active filling and construction activities. IDCC submitted a Request for Limited Exemption from the requirements of BAAQMD Regulation 8-34-117.1 through 117.6 and Rule 118 Construction Plan to the BAAQMD prior to commencing each construction project. Additionally, the USEPA issued a NOV on January 9, 2023 for an alleged failure to operate individual wells in accordance with the well disconnection timeline requirements of NESHAP 40 CFR 63, Subpart AAAA 40 CFR 60, Subpart WWW and Subpart XXX.

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* 08/01/2022 *through* 01/31/2023

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
Well Shutdown Limits	BAAQMD 8-34-117.6 and 501.1	Records	Periodic / Daily	BAAQMD 8-34-117.5	<24 hours per well or <5 days per well for component replacement	Intermittent	Several wells were temporarily disconnected from the GCCS for greater than 24 hours due to active filling and construction activities. IDCC submitted a Request for Limited Exemption from the requirements of BAAQMD Regulation 8-34-117.1 through 117.6 and Rule 118 Construction Plan to the BAAQMD prior to commencing each construction project. A subsurface oxidation (SSO) event was discovered at Newby Island on December 14 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 December 22, 2022 30-Day Deviation Report for additional information, including corrective actions taken. On December 22, 20222, a pipeline event at Newby Island. Following the discovery, site personnel immediately notified operations and maintenance (O&M) personnel and inspected the surrounding area. Immediate actions to protect human and environmental health and safety were taken by O&M personnel.

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* 08/01/2022 *through* 01/31/2023

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
Well Shutdown Limits	BAAQMD 8-34-117.6 and 501.1	Records	Periodic / Daily	BAAQMD 8-34-117.5	<24 hours per well or <5 days per well for component replacement	Intermittent	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). Refer to December 29, 2022 30-Day Deviation Report for additional information, including corrective actions taken. Additionally, the USEPA issued a NOV on January 9, 2023 for an alleged failure to operate individual wells in accordance with the well disconnection timeline requirements of NESHAP 40 CFR 63, Subpart AAAA 40 CFR 60, Subpart WWW and Subpart XXX.
TOC (Total Organic Com-pounds 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	Intermittent	On September 15, 2022 NOV A61613 was issued for alleged component leaks two (2) alleged component leaks exceeding 1,000 ppmv and five (5) alleged surface leaks exceeding 500 ppmv. The alleged leaks were identified by BAAQMD personnel during a site inspection completed on September 7, 2022. For additional information, including corrective actions taken, please refer to the 10/30-Day Combined Deviation and NOV Response Letter submitted to BAAQMD on September 23, 2022.

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* 08/01/2022 *through* 01/31/2023

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
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	On September 15, 2022 NOV A61613 was issued for alleged component leaks two (2) alleged component leaks exceeding 1,000 ppmv and five (5) alleged surface leaks exceeding 500 ppmv. The alleged leaks were identified by BAAQMD personnel during a site inspection completed on September 7, 2022. For additional information, including corrective actions taken, please refer to the 10/30-Day Combined Deviation and NOV Response Letter submitted to BAAQMD on September 23, 2022.
Non-Methane Organic Com-pounds (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% O2, expressed as methane (applies to flares only)	Continuous	N/A

NEWBY ISLAND LANDFILL

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
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 ^{o}F, averaged over any 3-hour period (applies to A-1/A-3 only) CT > 1400 ^{o}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)	Continuous	Based on records available for review at time of report submittal.
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

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* 08/01/2022 *through* 01/31/2023

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 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
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

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* 08/01/2022 *through* 01/31/2023

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
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
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

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* 08/01/2022 *through* 01/31/2023

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
SO_2	None	N/A	None	BAAQMD 9-1-301	Property Line Ground Level Limits: < 0.5 ppm for 3 minutes and < 0.25 ppm for 60 min. and <0.05 ppm for 24 hours (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
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 H2S)	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 H2S)	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* 08/01/2022 *through* 01/31/2023

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
NOx	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 NOx per million BTU LFG)	Continuous	N/A
H_2S	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
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

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* 08/01/2022 *through* 01/31/2023

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
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

NEWBY ISLAND LANDFILL

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:** *from* 02/01/2022 *through* 07/31/2022

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

NEWBY ISLAND LANDFILL

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* 02/01/2022 *through* 07/31/2022

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

NEWBY ISLAND LANDFILL

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* 02/01/2022 *through* 07/31/2022

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

NEWBY ISLAND LANDFILL

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* 02/01/2022 *through* 07/31/2022

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* 02/01/2022 *through* 07/31/2022

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

NEWBY ISLAND LANDFILL

TITLE V ANNUAL CERTIFICATION

SITE: NEWBY ISLAND LANDFILL	FACILITY ID#: A9013
REPORTING PERIOD: *from* 02/01/2022	*through* 01/31/2023

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:

Signature of Responsible Official

2/28/2023
Date

Kevin Divincenzo
Name of Responsible Official (please print)

Area President
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.

Compliance Certification Report

Site #: A9013 **Site Name:** Newby Island Landfill **Reporting Period:** 02/1/2022 to 01/31/2023

Address: 1601 Dixon Landing Road **City:** Milpitas, CA **Zip Code:** 95035

Source #: Facility **Source Name:** Facility

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	Odorous 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 **Site Name:** Newby Island Landfill **Reporting Period:** 02/1/2022 to 01/31/2023

Address: 1601 Dixon Landing Road **City:** Milpitas, CA **Zip Code:** 95035

Source #: Facility **Source Name:** Facility

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

Site #: A9013 **Site Name:** Newby Island Landfill **Reporting Period:** 02/1/2022 to 01/31/2023

Address: 1601 Dixon Landing Road **City:** Milpitas, CA **Zip Code:** 95035

Source #: Facility **Source Name:** Facility

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: 02/1/2022 to 01/31/2023
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: 02/1/2022 to 01/31/2023
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
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: 02/1/2022 to 01/31/2023
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 December 14, 2022. 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 December 22, 2022 30-Day Deviation Report for additional information, including corrective actions taken.
			I	On December 22, 2022, a pipeline event was discovered at Newby Island. Following discovery, site personnel immediately notified operations and maintenance (O&M) personnel and inspected the surrounding area. Immediate actions to protect human and environmental health and safety were taken by O&M personnel and O&M personnel completed repairs of pipeline. Procedures were followed per BAAQMD Regulation 8, Rule 34, Section 117 (8-34-117), except wells were taken offline for greater than 24 hours without prior approval from the Air Pollution Control Officer (APCO). Refer to December 29, 2022 30-Day Deviation Report for additional information, including corrective actions taken.

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: 02/1/2022 to 01/31/2023
Zip Code: 95035

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Continuous or Intermittent	Comments
			I	Several wells were temporarily disconnected from the GCCS for greater than 24 hours due to active filling and construction activities. IDCC submitted a Request for Limited Exemption from the requirements of BAAQMD Regulation 8-34-117.1 through 117.6 and Rule 118 Construction Plan to the BAAQMD prior to commencing each construction project. Additionally, the USEPA issued a NOV on January 9, 2023 for an alleged failure to operate individual wells in accordance with the well disconnection timeline requirements of NESHAP 40 CFR 63, Subpart AAAA 40 CFR 60, Subpart WWW and Subpart XXX.
8-34-117.6	Well Disconnection Records	Y	C	
8-34-118	Limited Exemption, Construction Activities	Y	C	
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	

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: 02/1/2022 to 01/31/2023
Zip Code: 95035

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Continuous or Intermittent	Comments
8-34-301.1	Continuous Operation	Y	I	There were unplanned shutdowns of the gas collection and control system (GCCS) that did not meet the exemption criteria in BAAQMD Rule 8-34-113. These events were reported to the BAAQMD as reportable compliance activities (RCA) and breakdown relief was requested. These events occurred on the following dates: • February 10, 2022 (IDs 08F38 and 08F39 – low temperature); • February 22, 2022 (IDs 08F64 and 08F65 – pump work); • March 21, 2022 (IDs 08G42 and 08G43 – sump maintenance); • April 6, 2022 (IDs 08G88 and 08G89 – routine quarterly sump jetting maintenance); • May 1, 2022 (IDs 08H21 and 08H22 – utility outage); • May 4, 2022 (IDs 08H34 and 08H35 - programmable logic controller [PLC] malfunction); • May 18, 2022 (IDs 08H81 and 08H82 - main blower variable Frequency Drive [VFD] malfunction) • June 15, 2022 (IDs 08J42 and 08J43 – Pacific Gas and Energy [PG&E] power outage); and • July 27, 2022 (IDs 08K52 and 08K53 – flame failure).

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: 02/1/2022 to 01/31/2023
Zip Code: 95035

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Continuous or Intermittent	Comments
				• August 3, 2022 (IDs 08K68 and 08K69) – high flow • August 5, 2022 (IDs 08K80 and 08K81 – high flow) • August 7, 2022 (IDs 08K84 and 08K85 – high flow) • September 5, 2022 (IDs 08L46 and 08L47 – Variable Frequency Drive [VFD] malfunction) • September 6, 2022 (IDs 08L63 and 08L64 – utility outage • September 15, 2022 (IDs 08L86 and 08L87 – flame failure • October 6, 2022 (IDs 08M37 and 08M38 – air compressor leak) • October 9, 2022 (IDs 08M51 and 08M52 – liquids accumulation) • October 19, 2022 (IDs 08M62 and 08M63 – liquids accumulation) • December 1, 2022 (IDs 08N89 and 08N90 – utility outage) • December 10, 2022 (IDs 08P09 and 08P10 – low flow) • December 11, 2022 (IDs 08P12 and 08P13 – oxygen intrusion) • December 13, 2022 (IDs 08P14 and 08P15 – low flow)

Compliance Certification Report

Site #: A9013
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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: 02/1/2022 to 01/31/2023
Zip Code: 95035

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Continuous or Intermittent	Comments
				The following Notices of Violation (NOV) were issued to IDCC by the BAAQMD site inspector on the dates noted below for an alleged failure to operate the GCCS continuously: • July 14, 2022: NOV A61610 in response to RCA event ID 08J42 / 08J43 • October 14, 2022: NOVsA61616 in response to RCA ID 08K84 / 08K85 • October 14, 2022: NOV A61617 in response to RCA ID 08L46 / 08L47 • October 14, 2022: NOV A61618 in response to RCA ID 08L63 / 08L64 • January 11, 2023: NOV A59759 in response to RCA ID 08H21 / 08H22 • January 11, 2023: NOV A61622 in response to RCA ID 08N89 / 08N90 • January 26, 2023: NOV A61625 in response to RCA ID 08P12 / 08P13 • January 26, 2023: NOV A61626 in response to RCA ID 08P14 / 08P15 For additional information, including corrective actions taken, please refer to the corresponding 10/30-Day Combined Deviation Letters and NOV Response Letters submitted to BAAQMD within the required timeframes.

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: 02/1/2022 to 01/31/2023
Zip Code: 95035

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Continuous or Intermittent	Comments
8-34-301.2	Collection and Control Systems Leak Limitations	Y	I	On September 15, 2022 NOV A61613 was issued for alleged component leaks two (2) alleged component leaks exceeding 1,000 ppmv and five (5) alleged surface leaks exceeding 500 ppmv. The alleged leaks were identified by BAAQMD personnel during a site inspection completed on September 7, 2022. For additional information, including corrective actions taken, please refer to the 10/30-Day Combined Deviation and NOV Response Letter submitted to BAAQMD on September 23, 2022.
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)			
8-34-303	Landfill Surface Requirements	Y	I	On September 15, 2022 NOV A61613 was issued for alleged component leaks two (2) alleged component leaks exceeding 1,000 ppmv and five (5) alleged surface leaks exceeding 500 ppmv. The alleged leaks were identified by BAAQMD personnel during a site inspection completed on September 7, 2022. For additional information, including corrective actions taken, please refer to the 10/30-Day Combined Deviation and NOV Response Letter submitted to BAAQMD on September 23, 2022.
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	

Compliance Certification Report

Site #: A9013
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Reporting Period: 02/1/2022 to 01/31/2023
Zip Code: 95035

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Continuous or Intermittent	Comments
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	
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	

Compliance Certification Report

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Reporting Period: 02/1/2022 to 01/31/2023
Zip Code: 95035

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Continuous or Intermittent	Comments
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	

Compliance Certification Report

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Reporting Period: 02/1/2022 to 01/31/2023
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Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Continuous or Intermittent	Comments
8-34-501.6	Leak Discovery and Repair Records	Y	I	During a BAAQMD and California Air Resource Board (CARB) inspection conducted on April 27, 2022, five (5) alleged surface leaks exceeding 500 ppmv and four (4) alleged component leaks exceeding 1,000 ppmv were identified by BAAQMD and CARB staff. This resulted in the BAAQMD issuing NOV No. A61608 on June 1, 2022. For additional information, including corrective actions taken, please refer to the June 6, 2022 10/30-Day Combined Deviation Letter and NOV Response Letter. On September 15, 2022 NOV A61613 was issued for alleged component leaks two (2) alleged component leaks exceeding 1,000 ppmv and five (5) alleged surface leaks exceeding 500 ppmv. The alleged leaks were identified by BAAQMD personnel during a site inspection completed on September 7, 2022. For additional information, including corrective actions taken, please refer to the 10/30-Day Combined Deviation and NOV Response Letter submitted to BAAQMD on September 23, 2022.
8-34-501.7	Waste Acceptance Records	Y	C	
8-34-501.8	Non-decomposable Waste Records	Y	C	
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	

Compliance Certification Report

Site #: A9013
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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: 02/1/2022 to 01/31/2023
Zip Code: 95035

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Continuous or Intermittent	Comments
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	

Compliance Certification Report

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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: 02/1/2022 to 01/31/2023
Zip Code: 95035

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Continuous or Intermittent	Comments
8-34-506	Landfill Surface Monitoring	Y	I	During a BAAQMD and California Air Resource Board (CARB) inspection conducted on April 27, 2022, five (5) alleged surface leaks exceeding 500 ppmv and four (4) alleged component leaks exceeding 1,000 ppmv were identified by BAAQMD and CARB staff. This resulted in the BAAQMD issuing NOV No. A61608 on June 1, 2022. For additional information, including corrective actions taken, please refer to the June 6, 2022 10/30-Day Combined Deviation Letter and NOV Response Letter. On September 15, 2022 NOV A61613 was issued for alleged component leaks two (2) alleged component leaks exceeding 1,000 ppmv and five (5) alleged surface leaks exceeding 500 ppmv. The alleged leaks were identified by BAAQMD personnel during a site inspection completed on September 7, 2022. For additional information, including corrective actions taken, please refer to the 10/30-Day Combined Deviation and NOV Response Letter submitted to BAAQMD on September 23, 2022.
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	

Compliance Certification Report

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Reporting Period: 02/1/2022 to 01/31/2023
Zip Code: 95035

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Continuous or Intermittent	Comments
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	
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			

Compliance Certification Report

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Reporting Period: 02/1/2022 to 01/31/2023
Zip Code: 95035

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Continuous or Intermittent	Comments
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	
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	

Compliance Certification Report

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Reporting Period: 02/1/2022 to 01/31/2023
Zip Code: 95035

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Continuous or Intermittent	Comments
60.36c(a)	Collection and Control Systems in Compliance by 30 months after Initial NMOC Emission Rate Report Shows NMOC Emissions ≥ 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	
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 AAAA	**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	

Compliance Certification Report

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Reporting Period: 02/1/2022 to 01/31/2023
Zip Code: 95035

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Continuous or Intermittent	Comments
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	
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				

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: 02/1/2022 to 01/31/2023
Zip Code: 95035

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Continuous or Intermittent	Comments
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	
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	C	
Part 10b	Limits for flare gas NOx (RACT, Cumulative Increase)	Y	C	
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	

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: 02/1/2022 to 01/31/2023
Zip Code: 95035

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Continuous or Intermittent	Comments
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
Site Name: Newby Island Landfill
Reporting Period: 02/1/2021 to 01/31/2022
Address: 1601 Dixon Landing Road
City: Milpitas, CA
Zip Code: 95035
Source #: S-3
Source Name: Composting Operation (S-3), Water Truck (A-3)

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
Site Name: Newby Island Landfill
Reporting Period: 02/1/2021 to 01/31/2022
Address: 1601 Dixon Landing Road
City: Milpitas, CA
Zip Code: 95035
Source #: S-4
Source Name: Non-Retail Gasoline Dispensing Facility

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
Site Name: Newby Island Landfill
Reporting Period: 02/1/2021 to 01/31/2022
Address: 1601 Dixon Landing Road
City: Milpitas, CA
Zip Code: 95035
Source #: S-4
Source Name: Non-Retail Gasoline Dispensing Facility

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
Site Name: Newby Island Landfill
Reporting Period: 02/1/2021 to 01/31/2022
Address: 1601 Dixon Landing Road
City: Milpitas, CA
Zip Code: 95035
Source #: S-4
Source Name: Non-Retail Gasoline Dispensing Facility

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
Site Name: Newby Island Landfill
Reporting Period: 02/1/2021 to 01/31/2022
Address: 1601 Dixon Landing Road
City: Milpitas, CA
Zip Code: 95035
Source #: S-4
Source Name: Non-Retail Gasoline Dispensing Facility

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
Site Name: Newby Island Landfill
Reporting Period: 02/1/2021 to 01/31/2022
Address: 1601 Dixon Landing Road
City: Milpitas, CA
Zip Code: 95035
Source #: S-4
Source Name: Non-Retail Gasoline Dispensing Facility

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

Site #: A9013
Site Name: Newby Island Landfill
Reporting Period: 02/1/2021 to 01/31/2022
Address: 1601 Dixon Landing Road
City: Milpitas, CA
Zip Code: 95035
Source #: S-4
Source Name: Non-Retail Gasoline Dispensing Facility

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 incompliance 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

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Reporting Period: 02/1/2021 to 01/31/2022
Address: 1601 Dixon Landing Road
City: Milpitas, CA
Zip Code: 95035
Source #: S-4
Source Name: Non-Retail Gasoline Dispensing Facility

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	