

FORTISTAR Methane Group

Gas Recovery Systems, LLC

1804 Dixon Landing Road • San Jose, California 95002

Tel. (408) 945-9445

January 27, 2012

Attn: Title V reports
Director of Compliance and Enforcement
Bay Area AQMD
939 Ellis Street
San Francisco, CA 94109

Subject: Semi-Annual Monitoring Report
Gas Recovery Systems, LLC - Facility Number B1670

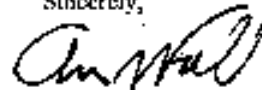
To Whom It May Concern;

Bay Area AQMD issued a new Major Facility Review Permit (Title V) to our facility on March 29, 2011. This permit included several revisions to the previous Title V permit. One of the revisions was a change in the due dates of Semi-Annual Reporting. The enclosed table details monitoring compliance for the referenced facility located at 1804 Dixon Landing Road, San Jose, CA 95002. This plant experienced occasional intermittent compliance as indicated on the attached table, however, a summary of the intermittent compliance items is as follows:

<u>Intermittent Compliance Item</u>	<u>Status</u>
1) Gas Flow Monitoring	Exceedance of 12-month downtime limit through November due to the flow meters being sent to the manufacturer for required calibration. Approved alternate flow monitoring using KWhr measurements available, appropriate notification was provided.
2) Retention of Records (5-Years)	Requires maintaining of required records for period of 5-years.

If there are any questions regarding this report, please direct them to Suparna Chakladar at (951) 833-4153.

Sincerely,



Anthony Falbo
Senior Vice President - Operations
FORTISTAR Methane Group
Gas Recovery Systems LLC.

Enclosure

cc: Bryan Lawrence, FMG
Suparna Chakladar, FMG

**MONITORING REPORT
 APPLICABLE LIMITS & COMPLIANCE MONITORING REQUIREMENTS
 GAS RECOVERY SYSTEMS, INC.
 PERMIT NUMBER B1670
 SOURCES S-2**

REPORTING PERIOD – July 31, 2011 through December 31, 2011

Source Nos. S-2					
Type of Limit	Citation of Limit	Compliance Status	Type of Limit	Monitoring Requirement Citation	Monitoring Type
Opacity	BAAQMD 6-301	In Compliance	Ringelmann #1	Not Applicable	None Required
FP	BAAQMD 6-310	In Compliance	0.15 grains/dscf	Not Applicable	None Required
TOC	BAAQMD 8-34-301.2 SIP 8-34-301.1	In Compliance	1000 ppov as Methane (component leak limit)	BAAQMD 8-34-501.6 and 8-34-503 SIP 8-34-509	Quarterly Inspection and Records
Non-Methane Organic Compounds (NMOC)	BAAQMD 8-34-301.4h	In Compliance	98% removal by weight DR < 120 ppov dry @ 3% O ₂ , expressed as methane	BAAQMD 8-34-412 and 8-34-501.4 Condition # 16669, Part 4e	Annual Source Test & weekly CO & O ₂ testing
POC	BAAQMD Condition # 16669, Part 8	Not Applicable System Never Installed	9 Pounds/Day	BAAQMD Condition # 16669, Part 8,9,10 & 11	Not Applicable System Never Installed
SO ₂	BAAQMD 9-1-301	In Compliance	Property Line Ground Level Limits < 0.5 ppov for 3 minutes, < 0.25 ppov for 60 minutes, and < 0.05 ppov for 24 hours	Not Applicable	None Required
SO ₂	BAAQMD 9-1-302	In Compliance	< 300 ppov (dry)	BAAQMD Condition # 16669, Part 5	Sulfur Analysis of landfill gas only

**MONITORING REPORT
 APPLICABLE LIMITS & COMPLIANCE MONITORING REQUIREMENTS
 GAS RECOVERY SYSTEMS, INC.
 PERMIT NUMBER B1670
 SOURCES S-2**

REPORTING PERIOD – July 31, 2011 through December 31, 2011

<u>Source Nos. S-2</u>					
Type of Limit	Citation of Limit	Compliance Status	Type of Limit	Monitoring Requirement Citation	Monitoring Type
H ₂ S	BAAQMD 9-2-301	In Compliance	Property Line ground level limits < 0.06 ppm Averaged over 3 minutes and < 0.03ppm Averaged over 60 minutes	Nos Applicable	None Required
Total Sulfur Content in Landfill Gas	BAAQMD Condition # 16669, Part 5	In Compliance	< 1300 ppmv (dry)	BAAQMD Condition # 16669, Part 5	Sulfur Analysis of landfill gas only
NO _x	BAAQMD 9-8-302.2 and BAAQMD Condition # 16669, Part 2	In Compliance	Waste Fuel Gas, Rich-Burn 210 ppmv dry @ 15% O ₂	BAAQMD Condition # 16669, Part 4d	Annual Source Test & Quarterly Monitoring
CO	BAAQMD 9-8-302.3	In Compliance	Waste Fuel Gas: 2000 ppmv dry @ 15% O ₂	BAAQMD Condition # 16669, Part 4d	Annual Source Test & weekly & Quarterly Monitoring
CO	BAAQMD Condition # 16669, Part 3	In Compliance	740 ppmv dry @ 15% O ₂	BAAQMD Condition # 16669, Part 7a-c	Annual Source Test & weekly & Quarterly Monitoring
Heat Input	BAAQMD Condition # 16669, Part 6	In Compliance	162 MM BTU/day/weight and 59.130 MM BTU per 12-month period	BAAQMD Condition # 16669, Part 7 d-e	Records of occurrence and duration
Emission Control System Shutdown Time	BAAQMD 8-34-113.2	In Compliance	240 hours/year	BAAQMD 8-34-501.2	Records Engine Plant and Related Equipment Only

**MONITORING REPORT
 APPLICABLE LIMITS & COMPLIANCE MONITORING REQUIREMENTS
 GAS RECOVERY SYSTEMS, INC.
 PERMIT NUMBER B1670
 SOURCES S-2**

REPORTING PERIOD -- July 31, 2011 through December 31, 2011

<u>Source Nos. S-2</u>					
Type of Limit	Citation of Limit	Compliance Status	Type of Limit	Monitoring Requirement Citation	Monitoring Type
Gas Flow	BAAQMD 8-34-301 and 301.1	In Compliance	Vent all collected gases to a properly operating control system and operate control system continuously.	BAAQMD 8-34-501.10 and 508	Gas Flow Meter and Recorder (every 15 minutes).
Periods of Inoperation for Parametric Monitors	BAAQMD 1-523.2	Intermittent Compliance	15 Consecutive days/incident and 30 calendar days/ 12 month period	BAAQMD 1-523.4	Records of Inoperative Monitor Flow meters calibrated/ maintenance 1/4-1/22, 7/13-8/10 (KWhr calculated flow continuously)
5-Year Recordkeeping	BAAQMD Standard Condition B	Intermittent Compliance	Requires Maintaining of required records for period of 5-years after	Regulation 3; MOP Volume II; Part 3, 4, 7; BAAQMD 8-34-5-1.12	Records of Subtotal

**MONITORING REPORT
 APPLICABLE LIMITS & COMPLIANCE MONITORING REQUIREMENTS
 GAS RECOVERY SYSTEMS, INC.
 PERMIT NUMBER B1670
 SOURCES S-3, S-4, & S-5**

REPORTING PERIOD – July 31, 2011 through December 31, 2011

<u>Source Nos. S-3, S-4, & S-5</u>					
Type of Limit	Citation of Limit	Compliance Status	Type of Limit	Monitoring Requirement Citation	Monitoring Type
Opacity	BAAQMD 6-301	In Compliance	Ringelmann #1	Not Applicable	None Required
FP	BAAQMD 6-310	In Compliance	0.15 grains/darf	Not Applicable	None Required
TOC	BAAQMD 8-34-301.2 SIP 8-34-301.1	In Compliance	1000 ppmv as Methane (component leak limit)	BAAQMD 8-34-501.6 and 8-34-503 SIP 8-34-503	Quarterly Inspection and Records
Non-Methane Organic Compounds (NMOC)	BAAQMD 8-34-301.4b	In Compliance	98% rebasal by weight OR < 120 ppmv dry @ 3% O ₂ , expressed as methane	BAAQMD 8-34-412 and 8-34-501.4 Condition # 347, Part 4e	Annual Source Test & Weekly CO & O ₂ Testing.
POC	BAAQMD Condition # 347, Part 8	Not Applicable System Never Installed	9 Pounds/Day	BAAQMD Condition # 347, Part 8, 9, 10 & 11	Not Applicable System Never Installed
SO ₂	BAAQMD 9-1-301	In Compliance	Property Line Ground Level Limits < 0.5 ppm for 3 minutes, < 0.25 ppm for 60 minutes, and < 0.05 ppm for 24 hours	Not Applicable	None Required
SO ₂	BAAQMD 9-1-302	In Compliance	< 300 ppm (dry)	BAAQMD Condition # 347, Part 5	Sulfur Analysis of landfill gas only

**MONITORING REPORT
 APPLICABLE LIMITS & COMPLIANCE MONITORING REQUIREMENTS
 GAS RECOVERY SYSTEMS, INC.
 PERMIT NUMBER B1670
 SOURCES S-3, S-4, & S-5**

REPORTING PERIOD - July 31, 2011 through December 31, 2011

Source Nos. S-3, S-4, & S-5					
Type of Limit	Citation of Limit	Compliance Status	Type of Limit	Monitoring Requirement Citation	Monitoring Type
H ₂ S	BAAQMD 9-2-301	In Compliance	Property Line ground level limits < 0.05 ppm Averaged over 3 minutes and < 0.03 ppm Averaged over 60 minutes	Not Applicable	None Required
Total Sulfur Content in Landfill Gas	BAAQMD Condition # 347, Part 5	In Compliance	< 1300 ppmv (dry)	BAAQMD Condition # 347, Part 5	Sulfur Analysis of landfill gas only
NO _x	BAAQMD 9-8-302.2 and BAAQMD Condition # 347, Part 2	In Compliance	Waste Fuel Gas, Rich-Burn 210 ppmv dry @ 15% O ₂	BAAQMD Condition # 347, Part 4d	Annual Source Test & Quarterly Monitoring
CO	BAAQMD 9-8-302.3	In Compliance	Waste Fuel Gas: 2000 ppmv dry @ 15% O ₂	BAAQMD Condition # 347, Part 4d	Annual Source Test & Weekly & Quarterly Monitoring
CO	BAAQMD Condition # 347, Part 3	In Compliance	740 ppmv dry @ 15% O ₂	BAAQMD Condition # 347, Part 7a-c	Annual Source Test & Weekly & Quarterly Monitoring
Heat Input	BAAQMD Condition # 347, Part 4	In Compliance	162 MM BTU/day/cycle and 59,130 MM BTU per 12-month period	BAAQMD Condition # 347, Part 7 a-e	Records of occurrence and duration
Emission Control System Shutdown Time	BAAQMD 8-34-113.2	In Compliance	240 hours/year	BAAQMD 8-34-501.2	Records Engine Plans and Related Equipment Only

MONITORING REPORT
APPLICABLE LIMITS & COMPLIANCE MONITORING REQUIREMENTS
GAS RECOVERY SYSTEMS, INC.
PERMIT NUMBER B1670
SOURCES S-3, S-4, & S-5

REPORTING PERIOD – July 31, 2011 through December 31, 2011

<u>Source Nos. S-3, S-4, & S-5</u>					
Type of Limit	Citation of Limit	Compliance Status	Type of Limit	Monitoring Requirement Citation	Monitoring Type
Gas Flow	BAAQMD 8-34-301 and 301.1	In Compliance	Vent all collected gases to a properly operating control system and operate control system continuously.	BAAQMD 8-34-501.10 and 508	Gas Flow Meter and Recorder (every 15 minutes)
Gas Flow	SIP 8-34-301 and 301.4	In Compliance	Vent all collected gases to a properly operating control system and operate control system continuously.	SIP 8-34-501.1	Gas Flow Meter and Recorder (every 15 minutes)
Periods of Inoperation for Parametric Monitors	BAAQMD 1-523.2	Intermittent Compliance	15 Consecutive days/incident and 30 calendar days/ 12 month period	BAAQMD 1-523.4	Records of occurrence and duration Deviation of 12-month limit addressed in 10-30 Day Report
Continuous Monitors	40 CFR 60.134(e)	In Compliance	Requires Continuous Operation except for breakdowns, repairs, calibration, and required span adjustments	40 CFR 60.7(h)	Records of occurrence and duration
5-Year Recordkeeping	BAAQMD Standard Condition E	Intermittent Compliance	Requires Maintaining of required records for period of 5-years after	Regulation 3: MOP Volume II; Part 3, 4.7; BAAQMD 8-34-5-1.12	Records of Submittal

**MONITORING REPORT
 APPLICABLE LIMITS & COMPLIANCE MONITORING REQUIREMENTS
 GAS RECOVERY SYSTEMS, INC.
 PERMIT NUMBER B1670
 SOURCE S-21**

REPORTING PERIOD – July 31, 2011 through December 31, 2011

<u>Source No. S-21</u>					
Type of Limit	Citation of Limit	Compliance Status	Type of Limit	Monitoring Requirement Citation	Monitoring Type
VOC Emission Limit	BAAQMD 8-2-301	In Compliance	15 pounds/day or 300 ppm, dry basis	BAAQMD Condition #16025 Part 6	Throughput Records
Throughput Limit	BAAQMD Condition #16025 Part 1	In Compliance	750,000 gallons of landfill gas condensate per 12-month period	BAAQMD Condition #16025 Part 4	Throughput Records
True Vapor Pressure	BAAQMD Condition #16025 Part 6	In Compliance	< 4.0 psi	BAAQMD Condition #16069 Part 10	Analysis of VOC's Note: Source Not Present

FORTISTAR Methane Group

Gas Recovery Systems, LLC

1804 Dixon Landing Road • San Jose, California 95002

Tel. (408) 945-9445

May 26, 2011

Director of Compliance and Enforcement
Bay Area AQMD
939 Ellis Street
San Francisco, CA 94109

Attn: Title V reports

Subject: 10 & 30 Day Report for Gas Recovery Systems, LLC - Plant B1670
- Engine Exhaust Temperature Deviation
- Parametric Monitor Downtime
- Weekly CO & O2 Monitoring

Plant #B1670 is a landfill gas to energy facility operated by Gas Recovery Systems, LLC (GRS) at 1804 Dixon Landing Road, San Jose, CA 95002. This facility is commonly referred to as the Newby Facility. During review of the semi-annual data for period ending April 30, 2011, GRS observed three cases of intermittent compliance.

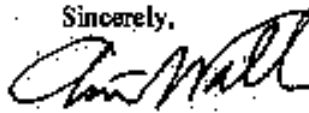
The combustion temperature for engines 3 (S-4) and 4 (S-5) fell below the lower temperature calculated from the most recent compliant source test which is a deviation from the combustion temperature requirements in Table IV-B of the Facility Permit. This occurred in January 2011 for engine 3 and February 2011 for engine 2 only. Such deviations of temperature are related to changes in gas quality which is outside our control. Each engine is equipped with controls that determine temperature of combustion based on heat content of influent gas while maintaining operating parameters at set points (emissions, air fuel ratio, etc.). The engines self corrected and needed no adjustments. It should be noted that the Final Major Facility Review Permit, dated March 29, 2011, has removed the combustion temperature monitoring requirements given the engines are consuming treated landfill gas, which is exempt from the NSPS regulation that sets forth combustion temperature requirements.

On November 4, 2010 the landfill gas flow meter for Engines #1, 2, 3 & 4 was sent out for required factory calibration and was placed into service again on November 22, 2010. This represents a deviation from BAAQMD Regulation 1-523.2 for limitation on parametric monitor downtime (flow meter). It should be noted that flow continued to be monitored and recorded using a BAAQMD approved calculation method based on KW-hr output.

Finally, weekly CO & Oxygen monitoring (which was initiated in the Renewal Permit dated March 29, 2011) was not performed until the week of May 23, 2011 due to a delay in the transition from temperature monitoring to weekly CO & Oxygen monitoring, however the continuous temperature monitoring which that condition was designed to replace, was performed and there were no deviations noted.

If there are any questions regarding this report, please direct them to Suparna Chakladar
at (951) 833-4153.

Sincerely,



Anthony Falbo
Vice President and General Manager
FORTISTAR Methane Group,
Gas Recovery Systems, LLC

cc: Suparna Chakladar, FMG
Bryan Lawrence, FMG

FORTISTAR Methane Group

Gas Recovery Systems, LLC
1804 Dixon Landing Road • San Jose, California 95002
Tel. (408) 416-0453 • Fax. (408) 416-0454

July 28, 2011

Director of Compliance and Enforcement
Bay Area AQMD
939 Ellis Street
San Francisco, CA 94109

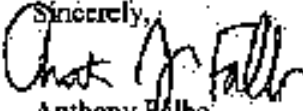
Subject: Inoperative Monitor Follow-up Letter
Gas Recovery Systems, LLC - Plant B1670
Landfill Gas Flow Meter Monitor

To Whom It May Concern:

As you are aware, Gas Recovery Systems, LLC. (GRS) filed an Inoperative Monitor Report on July 18, 2011 (attached) for a failed Flow Meter monitor. The District subsequently issued Episode #06A71 for the event. This letter is being written to inform you that the monitor is being repaired and that, based on discussions with the vendor, repairs will take approximately 2 weeks (August 1st, 2011) due to the vendor's backlog and repair schedule.

As described in the initial breakdown report, the flow meter for the plant became inoperable for unknown reasons and stopped calculating flow on July 14, 2011 at approximately 13:00. The monitor was sent to its manufacturer (Sage Metering) for repair. Although the flow meter is currently not operational, we are continuing to calculate flow via the BAAQMD approved method which utilizes KWhr produced and the engine heat rate. There are no excess emissions associated with this inoperative monitor.

GRS will notify you in writing as soon as the monitor is installed and operational. If there are any questions regarding this report, please direct them to Suparna Chakladar at (951) 833-4153.

Sincerely,

Anthony Falbo
Senior Vice President - Operations
FORTISTAR Methane Group
Gas Recovery Systems, LLC

cc: Bryan Lawrence, FMG
Suparna Chakladar, FMG

FORTISTAR Methane Group

Gas Recovery Systems, LLC
1804 Dixon Landing Road • San Jose, California 95002
Tel. (408) 416-0453 • Fax. (408) 416-0454

August 11, 2011

Director of Compliance and Enforcement
Bay Area AQMD
939 Ellis Street
San Francisco, CA 94109

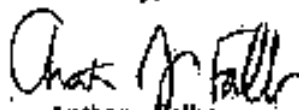
Subject: Clearing of Inoperative Monitor Report #06A71
Gas Recovery Systems, LLC - Plant B1670
Engine Exhaust Temperature Monitor

To Whom It May Concern;

As you are aware, Gas Recovery Systems, LLC (GRS) filed an Inoperative Monitor Report on July 18, 2011 for a failed Flow Meter monitor. This letter is being written to inform you that the monitor was repaired by the manufacturer and was reinstalled on August 10, 2011 with data collection resuming at 7:00 a.m. PST.

If there are any questions regarding this report, please direct them to Suparna Chakladar at (951) 833-4153.

Sincerely,



Anthony Dalbo
Senior Vice President - Operations
FORTISTAR Methane Group
Gas Recovery Systems, LLC

cc: Gary Lipari, BAAQMD
Bryan Lawrence, FMG
Suparna Chakladar, FMG

FORTISTAR Methane Group

Gas Recovery Systems, LLC

1804 Dixon Landing Road • San Jose, California 95002

Tel. (408) 945-9445

January 27, 2012

Attn: Title V reports
Director of Compliance and Enforcement
Bay Area AQMD
939 Ellis Street
San Francisco, CA 94109

Subject: 10 & 30 Day Report – Parametric Monitor Downtime
Gas Recovery Systems, LLC. - Plant B1670

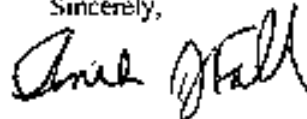
To Whom It May Concern;

Plant #B1670 is a landfill gas to energy facility operated by Gas Recovery Systems, LLC (GRS) at 1804 Dixon Landing Road, San Jose, CA 95002. This facility is commonly referred to as the Newby Facility. During review of the semi-annual data for period ending December 31, 2011, GRS observed an exceedance of the parametric monitor downtime limitation.

On July 14, 2011 the landfill gas flow meter for Engines #1, 2, 3 & 4 was sent out for maintenance and was placed into service again on August 10, 2011. This represents a deviation from BAAQMD Regulation 1-523.2 for limitation on parametric monitor downtime (flow meter). It should be noted that flow continued to be monitored and recorded using a BAAQMD approved calculation method based on KW-hr output.

If there are any questions regarding this report, please direct them to Suparna Chakladar at (951) 833-4153.

Sincerely,



Anthony Falbo
Senior Vice President - Operations
FORTISTAR Methane Group
Gas Recovery Systems, LLC

cc: Suparna Chakladar, FMG
Bryan Lawrence, FMG