

2 COMBINED MONITORING REPORT

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

Table 2-1 Combined Report Requirements

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

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

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

Appendix A contains a current map of West County's existing GCCS. West County currently has two separate GCCS's comprised of one flare (A-11) for Class I and one flare (A-8) and three lean burn Internal Combustion (IC) Engines (S-5, S-6, and S-37) for Class II. Section 2.1.1 includes the GCCS downtime for the reporting period. The information contained in Section 2.1.2 discusses the wellfield SSM log for the reporting period.

2.1.1 Collection System Downtime

During the period covered in this report, neither the Class I nor the Class II GCCS were shut down for more than five days on any one occasion. Table 2-2 and 2-3 summarize the Class I and Class II device's downtime for the reporting period.

Table 2-2 Class I Downtime

Month	Total Class I Downtime (Hours)
May 2012	2.78
June 2012	1.95
July 2012	15.30
August 2012	2.51
September 2012	3.18
October 2012	12.59
Total Hours:	38.30

Table 2-3 Class II Downtime

Month	Total Class II GCCS Downtime
May 2012	2.08
June 2012	0.00
July 2012	0.82
August 2012	0.00
September 2012	0.08
October 2012	9.38
Total Hours:	12.37

Class II GCCS Downtime is accrued with all emission control devices (A-8, S-5, S-6 and S-37) are not operating.

Appendix E contains the A-11 Flare Downtime Reports which lists dates, times, and lengths of shutdowns for the reporting period including year-to-date and the GCCS downtime for Class I. Appendix F contains the A-8 Flare and S-5, S-6, and S-37 IC Engine Downtime Reports which lists dates, times, and lengths of shutdowns for the reporting period including year-to-date and the GCCS downtime for Class II.

2.1.2 Well Start-Up & Disconnection Log

There were two (2) wellfield SSM events that occurred during the reporting period in Class I. No wells were started-up or decommissioned during the reporting period. See Appendix C, Class I Wellfield SSM Log for details of well disconnection and reconnection events.

There were 75 wellfield SSM events that occurred during the reporting period in Class II. Well WCLF0805 was decommissioned during the reporting period, on September 7, 2012. See Appendix D, Class II Wellfield SSM Log for details of well disconnection and reconnection events.

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

The emission control system at Class I consists of one (1) flare (A-11), which began operation in 2004. The control system was not bypassed at any time during the reporting period. Raw LFG was not emitted during the reporting period. The SSM logs for the A-11 Flare are located in Appendix E.

The emission control system at Class II consists of 1 flare (A-8) which began operation in 1990, 2 lean burn IC Engines (S-5, and S-6), which began operation in 1985 and 1 IC engine (S-37) which began operation in 1987. The control system was not bypassed at any time during the reporting period. Raw LFG was not emitted during the reporting period. The SSM logs for Class II are located in Appendix F.

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

Title 40 CFR §60.757(f)(2) is not applicable at West County because a bypass line has not been installed. LFG cannot be diverted from the control equipment.

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

BAAQMD Regulation 8-34-501.11 and 8-34-509 are not applicable to Class I and Class II because the control devices in each class are subject to continuous temperature monitoring as required in BAAQMD Regulation 8-34-507 and §60.757(f)(1).

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

Class I

The combustion zone temperature of the A-11 Flare is monitored with a Therm-X Thermocouple. The temperature is displayed with a Yokogawa digital recorder, which is downloaded and archived.

There were no temperature deviations reported to the BAAQMD during the reporting period. On December 16, 2011, Carol Allen of the BAAQMD clarified that the A-11 Flare combustion zone 3-hour average temperature limit for a deviation is 1450°F in accordance with Title V Permit Condition Number 20754 Part 4. Cornerstone will continue to monitor instances where the A-11 Flare

drops below the 1566°F limit established during March 13, 2012 Source test. However these instances, as clarified by BAAQMD, are not currently deemed temperature deviations, and will not be reported as such. Appendix G contains the Flare Temperature Deviation/ Inoperative Monitor/Missing Data Report for May 1, 2012 through October 31, 2012.

Class II

The combustion zone temperature of the A-8 flare is monitored with a Thermo Sensors Corp (TSC) Thermocouple. The temperature is displayed on a Honeywell digital display and Circular Chart recorder, which is routinely archived.

There were no temperature deviations reported to the BAAQMD during the reporting period. On December 16, 2011, Carol Allen of the BAAQMD clarified that the A-8 Flare combustion zone 3-hour average temperature limit for a deviation is 1400°F in accordance with Title V Permit Condition Number 17821 Part 9. Cornerstone will continue to monitor instances where the A-8 Flare drops below the 1550°F limit established during the March 13, 2012 Source test. However these instances, as clarified by BAAQMD, are not currently deemed temperature deviations, and will not be reported as such. Appendix H contains the Class II Temperature Deviation/ Inoperative Monitor/Missing Data Report for May 1, 2012 through October 31, 2012.

Inoperable Monitor

On August 10, 2012 at approximately 10:30 hours through August 12, 2012 at 00:30 hours flow and temperature were not recorded for the A-8 Flare due to the recorder not being manually reset to record for the new week. As of 00:31 hours on August 12, 2012 flow and temperature are being recorded continuously, as designed. A Reportable Compliance Activity (RCA) form (#06G46) was filed with the BAAQMD on August 17, 201. A Combined 10 and 30 day follow-up deviation letter was submitted to the BAAQMD on August 23, 2012. Appendix H contains the Class II Temperature Deviation/ Inoperative Monitor/Missing Data Report for May 1, 2012 through October 31, 2012

The combustion zone temperatures of the S-5, S-6, and S-37 IC engines are monitored with a R. Blair Engineering Thermocouple. The temperature is displayed with Altronic 40 ETM Temperature Scanner connected to a Supervisory Control and Data Acquisition (SCADA) system, which is downloaded and archived.

There was 1 temperature deviation reported to the BAAQMD during the reporting period. The S-6 Engine was not able to automatically adjust operating load in response to a decrease in flow to maintain compliant temperature and called out due to low temperature. A Reportable Compliance Activity (RCA) form (# 06G36) was filed with the BAAQMD on August 8, 2012. Appendix H contains the Class II

Temperature Deviation/Inoperative Monitor/Missing Data Report for May 1, 2012 through October 31, 2012.

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

The monthly cover integrity monitoring was performed for Class I and II on the following dates:

- May 23, 2012
- June 20, 2012
- July 25, 2012
- August 22, 2012
- September 28, 2012
- October 24, 2012

No cover issues were reported during these monitoring events. The Monthly Cover Integrity Monitoring Logs are included in Appendix I.

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

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

2.6 Surface Emissions Monitoring (BAAQMD 8-34-501.6, 8-34-506, & §60.757(f)(5) & California Code of Regulations (CCR) § 95469(a))

Field Solutions, Inc. (Field Solutions) completed the Second and Third Quarter 2012 Instantaneous and Integrated Surface Emission Monitoring (SEM) events and RMC Geoscience, Inc. (RMC) prepared the Second and Third Quarter 2012 SEM Reports. Refer to the Second and Third Quarter 2012 SEM Reports, located in Appendix J, for detailed results.

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

Weekly wellfield and Monthly GCCS component leak testing are conducted at the Class I landfill to satisfy the requirements of Title V permit Condition 20754 Part 2(c)(v) and BAAQMD Regulation 8-34-503. Component leak testing occurred during the reporting period on the following days:

- May 7, 14, 21, 26, and 31, 2012
- June 4, 11, 18, and 25, 2012
- July 2, 9, 12, 14, and 23, 2012

- August 3, 6, 13, 17, 19, 21, and 27, 2012
- September 5, 10, 21, 22, and 28, 2012
- October 1, 8, 15, 20, 22, 24, and 29, 2012

Refer to the Class I Weekly and Monthly Component Leak Monitoring Logs, located in Appendix K, for detailed results.

Monthly GCCS component leak testing is completed for the Class II Landfill Perimeter and LFG/Nove Plant to satisfy the requirements of BAAQMD Regulation 8-34-503. Component leak testing occurred during the reporting period on the following days:

- May 12 and 25, 2012
- June 13, 14, 15, and 18, 2012
- July 6, 7, 10, 18, 20, and 25, 2012
- August 4, 7, 10, and 15, 2012
- September 14, 15, 19, 22, and 26, 2012
- October 5, 6, 12, and 17, 2012

Refer to the Class II Component Leak Monitoring Logs, located in Appendix L, for detailed results.

Republic documents all emissions greater than the surface emission limit of 500 ppmv of methane instead of the 1,000 ppmv component leak limit in order to be conservative in regards to emissions from components (i.e. well boreholes) which are subject to the 500 ppmv surface emission limit.

Application Number 21424, approved by BAAQMD on December 23, 2011, allows for alternative operating conditions for the twenty (20) Class II Horizontals, similar to Class I Title V Permit Condition Number 20754 Part 2(c)(v-vi). Therefore, any GCCS components disconnected during the reporting period were monitored for component leaks within 7 and 30 days following the initial disconnection. Details of the GCCS component leak testing and results are included in the Class II Well SSM Log in Appendix D.

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

The West County Class I and Class II landfills are closed and no longer accept waste. The Waste-In-Place as of closure is approximately 376,110 tons and 12,330,387 tons, respectively.

2.9 Non-Degradable Waste Acceptance Records (BAAQMD 8-34-501.8)

The GCCS Design Plan for West County does not indicate non-degradable waste areas that are excluded from the collection system. Therefore, BAAQMD Regulation 8-34-501.8 is not applicable. A layer of MSW was placed in the Class I HWMF landfill directly preceding closure in which the GCCS was installed, however the waste below is generally considered non-degradable waste.

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

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

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

Wellhead monitoring was performed on the following dates for Class I:

- May 7, 14, 21, and 31, 2012
- June 4, 11, 18, and 25, 2012
- July 2, 9, 16, 23, and 30, 2012
- August 6, 13, 21, and 27, 2012
- September 5, 10, 17, and 28, 2012
- October 1, 8, 15, 22, and 29, 2012

Wellhead monitoring was performed on the following dates for Class II:

- May 2, 9, 11, 12, 16, 21, 23, 30, and 31, 2012
- June 6, 8, 15, 18, 25, and 27, 2012
- July 2, 6, 7, 13, 16, 17, 18, and 23, 2012
- August 3, 4, 13, 15, 21, 22, and 27, 2012
- September 5, 7, 14, 15, and 26, 2012
- October 1, 3, 5, 6, 15, and 17, 2012

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

There was 1 well in Class I and sixteen (16) wells in Class II with readings that exceeded the limits set forth in BAAQMD Regulation 8-34-305, Permit to Operate (PTO) Condition Number 20754 Part 2(d)(iii) and Application Number (AN) 21424 during the reporting period. Corrective action for wells was initiated within the

required 5-day time period and re-monitoring was completed within 15 days of the deviation pursuant to BAAQMD Regulation 8-34-414. All wells were returned to compliant operating levels within the 120-day timeline specified in Regulation 8-34.

Alternative compliance limits were requested of BAAQMD in December 2009, and approved on December 23, 2011, to operate the Class II horizontals less than continuously. In order to avoid having to decommission wells due to excessive oxygen, the Class II horizontals have been operating with a 15 percent oxygen limit and are temporarily disconnected from the system when an oxygen exceedance is in conjunction with methane concentrations below five (5) percent.

See Appendix K, Wellfield Deviation Log, for more detail.

2.10.2 Higher Operating Value (HOV) Wells

As of October 31, 2012, the following wells are approved to operate at a HOV for oxygen pursuant to Permit Condition Number 20754 Part 2(c)(ii) and AN 21424:

- All sixteen (16) Class I Wells; and
- All twenty (20) Class II Horizontal Collectors are allowed to operate up to 15 percent oxygen by volume.

These wells are also allowed to operate above 15 percent oxygen in order to meet the criteria to be temporarily disconnected from the system when corresponding methane concentrations are less than 5 percent by volume.

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

The flare LFG flow rate at the A-11 Flare is measured with a Fluid Components International (FCI) Model ST-98 flow meter. The General Electric data panel displays the LFG flow and the digital Yokogawa data recorder records LFG flow and temperature every 20 seconds and is downloaded and saved to a compact flash card.

The flare LFG flow rate at the A-8 Flare is measured with a FCI Model ST-98 flow meter. The Honeywell Digital panel displays the LFG flow and the Honeywell Circular Chart data recorder records LFG flow continuously and is routinely archived. The IC Engine LFG flow rate at S-5, S-6, and S-37 is measured with a Rosemount Model 1151DP flow meter. The Rockwell Automation panel displays the LFG flow rate. The SCADA records LFG flow every 15 minutes and is downloaded and saved in PDF format for record keeping.

The flare and engines flow meters meet the requirements of BAAQMD Regulation 8-34-508 by recording data at least every 15 minutes. The flow meters are maintained and calibrated pursuant to manufacturer's recommendations. The flow data for the flares and IC engines are available for review at West County. Appendix Q contains a summary of the monthly LFG flow rates for the flares and engines. Appendix G and H contain the Class I and Class II Temperature Deviation/ Inoperative Monitor/Missing Data Reports for May 1, 2012 through October 31, 2012. Table 2-2 below is a summary of the total LFG flow for the reporting period of May 1, 2012 through October 31, 2012.

Table 2-2 Total LFG Flow for May 1, 2012 through October 31, 2012

Emission Control Device	Average Flow (scfm)	Average CH ₄ (%)*	Total LFG Volume (scf)	Total CH ₄ Volume (scf)	Heat Input (MMBTU)
A-11 Flare	149.5	32.3	39,255,002.7	12,679,365.9	12,844.2
A-8 Flare	612.0	40.8	161,392,032.0	65,847,949.1	66,704.0
S-5 IC Engine	392.4	41.9	99,125,973.0	41,533,782.7	42,073.7
S-6 IC Engine	388.1	42.3	99,123,383.0	41,929,191.0	42,474.3
S-37 IC Engine	340.4	42.0	80,016,408.0	33,606,891.4	34,043.8

scfm = standard cubic feet per minute

CH₄ = methane

scf = standard cubic feet

*Methane content determined from the average of the 2011 and 2012 Annual Source Tests for each device

MMBTU = million British thermal units

2.12 Compliance with Title V Permit Condition Number 17821 Part 10

Pursuant to Title V Permit Condition Number 17821, Part 10(a)(2), quarterly hydrogen sulfide (H₂S) readings were taken using Draeger tubes. Results of the Second and Third Quarter 2012 H₂S readings were 50 and 42 ppmv, respectively. No quarterly readings were in exceedance of 300 ppmv, during the reporting period.

2.13 Compliance with §60.757(f)(6)

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

Well WCLF0805 was decommissioned during the reporting period (Class II) pursuant to PTO Condition Number 17821 Part 6(b), on September 7, 2012. There were no GCCS modifications made for Class I pursuant to PTO Condition Number 20754 Part 2(b).

PTO Condition Number 17821 Part 6(b) still allows for the installation of up to 94 new vertical wells, installation of up to 20 new horizontal wells, the

decommissioning of up to 25 vertical wells, and the decommissioning of up to 9 horizontal collectors. PTO Condition Number 20754 Part 2(b) still allows for the connection of up to 32 leachate removal wells.

As of October 31, 2012, West County consists of 16 horizontal collectors in Class I, and 94 vertical wells and 20 horizontal collectors in Class II.

2.14 Compliance with Title V Permit Condition Number 22792 for S-50 Solid Waste Transfer Station; and A-50 Water Mist System

The total quantity of waste accepted at the waste transfer station, S-50, for the period of May 1, 2012 through October 31, 2012 is 73,767 tons. The annual amount of waste accepted for the period of November 1, 2011 through October 31, 2012 is 146,699 tons. This is within the limit of 2,000 tons per day or 730,000 tons per any consecutive 12-month period pursuant to Title V Permit Condition Number 22792 Part 1. Monthly waste acceptance totals for the reporting period are in Appendix S. These records are maintained at West County's Golden Bear Transfer Station and can be made available upon request.

Pursuant to Title V Permit Condition Number 22792 Part 2-4, all wastes (mixed wastes, green material and wood wastes) were removed from the transfer station within 48 hours after being accepted. All visible particulate emissions were prevented and/or minimized by use of the water (A-50 water spray system) and/or dust suppressants applied on all unpaved roadways. All paved roadways were cleared from dirt and debris resulting visible particulate emissions at S-50 not exceeding Ringlemann 1.0 or resulting in fallout on neighboring property during the reporting period (May 1, 2012 through October 31, 2012). Records of all vehicle route maintenance (cleaning of paved roads and application of water or dust suppressant on unpaved roads) are maintained at West County's Golden Bear Transfer Station and can be made available upon request.

Pursuant to Title V Permit Condition Number 22792 Part 6 and 7 (c-d) the S-50 waste transfer station daily round-trip vehicle trips did not exceed 1,075 on any day and did not exceed 232,900 over any consecutive 12-month period. Monthly numbers of vehicle trip totals and consecutive 12-month vehicle trip totals for the reporting period are listed in Appendix S.

2.15 Compliance with Title V Permit Condition Number 23110 for S-41 HiPOx Advanced Oxidation System, Ozone Generator and A-41 Ozone Gas Destruct Unit.

Pursuant to Title V Permit Condition Number 23110 Part 2, S-41, abated by A-41 Ozone gas destruct unit, is equipped with a continuous ozone monitoring sensor in the exhaust gas stack and will shut down the ozone generator upon detection

of ozone concentrations above 0.1 ppmv. All records of shutdowns and ozone concentrations are onsite and can be made available upon request.

Pursuant to Title V Permit Condition Number 23110 Part 3, wastewater through S-41 did not exceed 40,800 gallons per day and 14,492,000 gallons per year while in operation.

As of February 2012, S-41 is no longer in operation.

2.16 Compliance with Title V Permit Condition Number 23220 and Authority to Construct (ATC) Application Number 20621 Condition Number 20054

Pursuant to ATC Application Number 20621 Condition Number 25004, the wastewater throughput at the inlet storage tanks (S-69, S-70, S-141 and S-156) and the leachate treatment facility (S-71, S-72, S-140, S-74, S-123, S-151, S-142, S-145, S-146, S-150, S-153, S-155 and S-157) as of May 1, 2012 through the end of the reporting period (October 31, 2012) did not exceed 40,800 gallons per day and 14,892,000 gallons during any consecutive 12-month period. The total throughput to the inlet storage tanks S-69, S-70, S-141, and S-156 and the leachate treatment facility sources for each month (gallons/month) and the total cumulative throughput for each rolling 12-month period were recorded. These records are available onsite at West County upon request. A summary of the total combined wastewater throughput (gallons) and 12-month combined rolling throughput (gallons) for the reporting period (May 1, 2012 through October 31, 2012) is listed for the Leachate Treatment System in Appendix T and available on site upon request.

Pursuant to ATC Application Number 20621 Condition Number 20054 Part 2, influent vapor flow to the A-20 and A-21 Carbon Adsorber's did not exceed 200 scfm during the reporting period (May 1, 2012 through October 31, 2012).

Pursuant to Title V Permit Condition Number 23220 and ATC Application Number 20621 Condition Number 20054 Part 4, NMOC leaks from all valves, flanges and pumps did not exceed concentrations above 100 ppmv during the reporting period.

Pursuant to ATC Application Number 20621 Condition Number 20054 Part 5 and 6, NMOC concentrations are measured with an FID, at the inlet to A-20, outlet of A-20 and outlet of A-21. A-20 is changed out if NMOC concentrations at the A-20 outlet are 10 ppmv or greater and are 10 percent greater than the A-20 inlet concentrations. The A-21 is changed out when measured NMOC concentrations at the A-21 outlet are 6 ppmv or greater. Pursuant to Title V Permit Condition Number 23110 and ATC Application Number 20621 Condition Number 20054 Part 8 NMOC concentrations are measured at the A-20 and A-21 on a weekly

basis. Since the beginning of this reporting period (May 1, 2012) the A-20, and the A-21 carbon vessels have not been changed as of the end of the reporting period (October 31, 2012).

2.17 Compliance with Title V Permit Condition Number 23220 and ATC Application Number 20621 Condition Number 20054 Part 3

Wastewater separators S-71, S-72, S-141 and S-156 were kept closed at all times during the reporting period (May 1, 2012 through October 31, 2012) except when opening for inspection and maintenance. Records of all openings for inspection and maintenance are on-site and available upon request.

2.18 Compliance with Title V Permit Condition Number 23316 and ATC Application Number 20621 Condition Number 20054 for S-48, S-120 and S-130 Air Strippers and A-14, A-15, A-16, A-17, A-18 and A-19 Carbon Absorbers

Pursuant to ATC Application Number 20621 Condition Number 20054 Parts 1 and 7, the total combined wastewater throughput at the S-120 and backup S-130 Air Strippers did not exceed 40,800 gallons per day and 14,892,000 gallons during any consecutive 12-month period. S-130 is a backup source has not been used as of the end of the reporting period (October 31, 2012). Liquid throughput information for S-120 since start-up through the end of the reporting period is on-site and available upon request and listed in Appendix T.

Pursuant to Title V Permit Condition Number 23316 Part 2 and ATC Application Number 20621 Condition Number 20054 Part 2, influent vapor flow to the A-14, A-15 and A-16 activated carbon vessels or the A-17, A-18, and A-19 activated carbon vessels did not exceed a cumulative flow rate of 850 scfm during the reporting period (May 1, 2012 through October 31, 2012).

Pursuant to Title V Permit Condition Number 23316 and ATC Application Number 20621 Condition Number 20054 Part 3, NMOC leaks from all valves, flanges and pumps did not exceed concentrations above 100 ppmv during the reporting period.

Pursuant to Title V Permit Condition Number 23316 and ATC Application Number 20621 Condition Number 20054 Part 4, 5 and 8, NMOC concentrations are measured with an FID, at the inlet to A-14, A-16 or A-18, outlet of A-14, A-16 or A-18 and the outlet of A-15, A-17, and A-19. The A-14 or A-16 is changed out if NMOC concentrations at the A-14 or A-16 outlet is 10 ppmv or greater and is 10 percent greater than the A-14 or A-16 inlet concentrations. The A-15 or A-17 is changed out when measured NMOC concentrations at the A-15 or A-17 outlet are 6 ppmv or greater.

Pursuant to ATC Application Number 20621 Condition Number 20054, the A-14 and A-15 or the A-17 and A-18 are changed out if NMOC concentrations at the A-14 and A-15 outlet or the A-17 and A-18 outlet is 10 ppmv or greater and is 10 percent greater than NMOC concentrations at the A-14 and A-15 or A-17 and A-18 inlet concentrations. The A-16 or A-19 is changed out when measured NMOC concentrations at the A-16 or A-19 outlet are 6 ppmv or greater.

Pursuant to Title V Permit Condition Number 23316 and ATC Application Number 20621 Condition Number 20054 Part 8, NMOC concentrations are measured at the A-14, A-15 and A-16 or the A-17, A-18 and A-19 on a weekly basis. During the reporting period, the A-14, A-15, A-16, A-17, A-18 and A-19 carbon vessels were not changed.

These records are available on-site at West County upon request.

2.19 Compliance with Title V Permit Condition Number 23350 for S-111 Concrete Crusher and A-111 Water Spray System

Pursuant to Title V Permit Condition Number 23350 Part 2, the S-111 Concrete Crusher did not operate during the reporting period and therefore did not exceed 30,000 tons of concrete throughput in any consecutive 12-month period during this reporting period (May 1, 2012 through October 31, 2012). Records are available on-site at West County upon request

Pursuant to Title V Permit Condition Number 23350 Parts 3 and 4, the S-111 was not in operation on site during the reporting period and therefore no visible emissions as dark or darker than Ringelmann 1.0 for periods over 3 minutes during any hour or any fallout onto adjacent property occurred causing a public nuisance during the reporting period.

Waterborne petroleum resin dust suppressant or another equivalent chemical dust suppressant (which includes water) was applied to all unpaved on-site truck routes, to and from concrete and asphalt recycling operations achieving a minimum particulate matter (TSP) control efficiency of 75 percent by weight for the reporting period, pursuant to Title V Permit Condition Number 23350 Part 5.

2.20 Compliance with Title V Permit Condition Number 23351 for S-112 Crushed Concrete Screener and A-112 Water Spray System

Pursuant to Title V Permit Condition Number 23351 Part 2, the S-112 Crushed Concrete Screener did not operate during the reporting period and therefore did not exceed 30,000 tons of concrete throughput in any consecutive 12-month

period during this reporting period (May 1, 2012 through October 31, 2012). Records are available on-site at West County upon request.

Pursuant to Title V Permit Condition Number 23351 Part 3-4, S-112 was not in operation, therefore no visible emissions as dark or darker than Ringelmann 1.0 for periods over 3 minutes during any hour or any fallout onto adjacent property occurred causing a public nuisance during the reporting period.

2.21 Compliance with Title V Permit Condition Number 23352 for S-113 Concrete/Asphalt Storage Piles and A-113 Water Spray System

Pursuant to Title V Permit Condition Number 23351 Part 1, the S-113 Concrete/Asphalt Storage Piles did not exceed 30,000 tons of concrete throughput or 5,000 tons of asphalt throughput in any consecutive 12-month period during this reporting period (May 1, 2012 through October 31, 2012). The total monthly and annual throughput to S-113 was recorded pursuant to Title V Permit Condition Number 23351 Part 4. Total monthly throughput is listed in Concrete and Asphalt Throughput in Appendix V, and all throughput records are available on-site upon request.

Pursuant to Title V Permit Condition Number 23352 Part 2-3, all times during operation of S-113, abated by A-113 as necessary, no visible emissions as dark or darker than Ringelmann 1.0 for periods over 3 minutes during any hour or any fallout onto adjacent property occurred causing a public nuisance during the reporting period.

2.22 Compliance with Title V Permit Condition Number 23353 for S-114 Conveyors (Crushed Concrete) and A-114 Water Spray System

Pursuant to Title V Permit Condition Number 23353 Part 1, the S-114 Conveyors did not operate during the reporting period and therefore did not exceed 30,000 tons of crushed concrete throughput in any consecutive 12-month period during this reporting period (May 1, 2012 through October 31, 2012). The total monthly and annual throughput to S-114 was recorded pursuant to Title V Permit Condition Number 23353 Part 5 and are available on-site at West County upon request.

Pursuant to Title V Permit Condition Number 23353 Parts 3 and 4, all times during operation of S-114, abated by A-114, no visible emissions as dark or darker than Ringelmann 1.0 for periods over 3 minutes during any hour or any fallout onto adjacent property occurred causing a public nuisance during the reporting period.

2.23 Compliance with Title V Permit Condition Number 23354 for S-115 Wood/Yard Waste Shredder (Tub Grinder) and A-115 Water Spray System

Pursuant to Title V Permit Condition Number 23354 Part 2, the S-115 Wood/Yard Waste Shredder did exceed 19,000 tons of wood waste throughput in any consecutive 12-month period during this reporting period (May 1, 2012 through October 31, 2012). Inspection by BAAQMD indicated no deviation per the pending Change of Permit Conditions Application Number 23078 which was filed on February 15, 2011, to increase the 12-month throughput limit. The final terms of the Change of Permit Conditions are currently in negotiations as of the end of the reporting period. The total monthly and annual throughput to S-115 was recorded pursuant to Title V Permit Condition Number 23354 Part 5 and is listed in the Organic Throughput in Appendix U. Records are available on-site at West County upon request.

Pursuant to Title V Permit Condition Number 23354 Part 3-4, all times during operation of S-115, abated by A-115, no visible emissions as dark or darker than Ringelmann 1.0 for periods over 3 minutes during any hour or any fallout onto adjacent property occurred causing a public nuisance during the reporting period.

In accordance with Title V Permit Condition Number 23354 Part 6, the facility did not receive any violation notices for public nuisance in any consecutive 12-month period, during this reporting period of May 1, 2012 through October 31, 2012.

2.24 Compliance with Title V Permit Condition Number 23355 for S-116 Wood Waste Screener and A-116 Water Spray System

Pursuant to Title V Permit Condition Number 23355 Part 2, the S-116 Wood Waste Screener did exceed 19,000 tons of wood waste throughput in any consecutive 12-month period during this reporting period (May 1, 2012 through October 31, 2012). Inspection by BAAQMD indicated no deviation per the pending Change of Permit Conditions Application Number 23078 which was filed on February 15, 2011, to increase the 12-month throughput limit. The final terms of the Change of Permit Conditions are currently in negotiations as of the end of the reporting period. The total monthly and annual throughput to S-115 was recorded pursuant to Title V Permit Condition Number 23355 Part 5 and is listed in the Organic Throughput in Appendix U. Records are available on-site at West County upon request.

Pursuant to Title V Permit Condition Number 23355 Part 3-4, all times during operation of S-116, abated by A-116, no visible emissions as dark or darker than Ringelmann 1.0 for periods over 3 minutes during any hour or any fallout onto adjacent property occurred causing a public nuisance during the reporting period.

2.25 Compliance with Title V Permit Condition Number 23356 for S-117 Composting Operation and A-117 Water Spray System

Pursuant to Title V Permit Condition Number 23356 Part 1, the S-117 Composting operation did exceed 19,000 tons of compost material throughput in any consecutive 12-month period during this reporting period (May 1, 2012 through October 31, 2012). Inspection by BAAQMD indicated no deviation per the pending Change of Permit Conditions Application Number 23078 which was filed on February 15, 2011, to increase the 12-month throughput limit. The final terms of the Change of Permit Conditions are currently in negotiations as of the end of the reporting period. The total monthly and annual throughput to S-117 was recorded pursuant to Title V Permit Condition Number 23356 Part 5 and is listed in the Organic Throughput in Appendix V.

Pursuant to Title V Permit Condition Number 23356 Part 2-3, all times during operation of S-117, abated by A-117, no visible emissions as dark or darker than Ringelmann 1.0 for periods over 3 minutes during any hour or any fallout onto adjacent property occurred causing a public nuisance during the reporting period.

Waterborne petroleum resin dust suppressant or another equivalent chemical dust suppressant (which includes water) was applied to all unpaved on-site truck routes, to and from compost operations achieving a minimum TSP control efficiency of 75 percent by weight for the reporting period, pursuant to Title V Permit Condition Number 23356 Part 4.

2.26 Compliance with Title V Permit Condition Number 23357 for S-118 Crushing of Asphalt Debris and A-118 Water Spray System

Pursuant to Title V Permit Condition Number 23357 Part 1, the S-118 Crushing of Asphalt Debris did not operate and therefore did not exceed 5,000 tons of asphalt throughput in any consecutive 12-month period during this reporting period (May 1, 2012 through October 31, 2012). The total monthly and annual throughput to S-118 was recorded pursuant to Title V Permit Condition Number 23357 Part 4 and records are available on-site at West County upon request.

Pursuant to Title V Permit Condition Number 23357 Part 2-3, all times during operation of S-118, abated by A-118, no visible emissions as dark or darker than Ringelmann 1.0 for periods over 3 minutes during any hour or any fallout onto adjacent property occurred causing a public nuisance during the reporting period.

2.27 Compliance ATC Application Number 20621 Condition Number 20054 Part 1a

For the reporting period wastewater inlet to S-69, S-70, S-141 and S-156 did not have a VOC content, analyzed by method 8260 or 8021, in excess of 809 pounds per day or 295,285 pounds per year. Strategic Engineering and Science (SES) confirmed the plant started accepting leachate from the wellfield in the inlet storage tanks, on April 2, 2012 as noted in the November 1, 2011 through April 30, 2012 Semi-Annual Report. However, troubleshooting was performed through April 21, 2012 on various plant elements such as fixing pH probes, adjusting metering pumps, adjusting polymer dosages, etc. Once the startup problems were addressed, the functional plant started operations on or about April 19, 2012. Samples are taken, on a semi-annual basis, from the discharge side of the inlet storage tanks. Pursuant to ATC Application Number 20621 Condition Number 20054, a sample was taken within one month of operation on May 15, 2012 and submitted to the BAAQMD Engineering Division. The initial VOC sample results are provided in Appendix W.

4 STARTUP, SHUTDOWN, MALFUNCTION (SSM) PLAN

4.1 SSM Log for the GCCS at West County

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

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

- During the reporting period, 34 A-11 Flare SSM events occurred. The A-11 Flare was shut down and restarted during the reporting period due to the reasons noted in Appendix D, Flare SSM Log.
- During the reporting period, 10 A-8 Flare SSM events occurred. The A-8 Flare was shut down and restarted during the reporting period due to the reasons noted in Appendix D, Flare SSM Log.
- During the reporting period, 28 S-5 IC Engine SSM events occurred. The S-5 IC Engine was shut down and restarted during the reporting period due to the reasons noted in Appendix D, Flare SSM Log.
- During the reporting period, 37 S-6 IC Engine SSM events occurred. The S-6 IC Engine was shut down and restarted during the reporting period due to the reasons noted in Appendix D, Flare SSM Log.
- During the reporting period, 20 S-37 IC Engine SSM events occurred. The S-37 IC Engine was shut down and restarted during the reporting period due to the reasons noted in Appendix D, Flare SSM Log.
- During the reporting period, 2 Class I Wellfield SSM events and 75 Class II Wellfield SSM events occurred. Details are included in Appendix C, Well SSM Log.

- There were 206 events in total, 36 SSM events in Class I and 170 SSM events in Class II. In all 206 events, automatic systems and operator actions were consistent with the standard operating procedures contained in the SSM Plan. There were no deviations from the SSM plan.
- Exceedances were not identified during the reporting period in any applicable emission limitation in the landfills NESHAP (§63.10(d)(5)(i)).
- Revisions of the SSM Plan to correct deficiencies in the landfill operations or procedures were neither required, nor prepared (§63.6(e)(3)(viii)).