

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 Ox Mountain Landfill. The report contains monitoring data for the operation of the landfill gas collection and control system (GCCS). The operational records have been reviewed and summarized. The timeframe included in this report is October 1, 2011 through March 31, 2012. The following table lists the rules and regulations that are required to be included in this Combined Report.

Table 2-1 Combined Report Requirements

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

RULE	REQUIREMENT	LOCATION IN REPORT
8-34-501.9, 8-34-505, §60.757(f)(1)	For operations subject to Section 8-34-505, records of all monitoring dates and any excesses of the limits stated in Section 8-34-305 that are discovered by the operator, including well identification number, the measured excess, the action taken to repair the excess, and the date of repair.	Section 2.10, 2.10.1, Appendices J & K
8-34-501.10, 8-34-508, §60.757(f)(1)	Continuous gas flow rate records for any site subject to Section 8-34-508.	Section 2.11, Appendices E and L
8-34-501.11, 8-34-509	For operations subject to Section 8-34-509, records of 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)(1)	Value and length of time for exceedance of parameters monitored per §60.756(a), (b), or (d).	Section 2.3
§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 §60.758.	Section 2.2.1
§60.757(f)(3)	Description and duration of all periods when control devices were not operating for more than 1 hour §60.756.	Section 2.2
§60.757(f)(4)	All periods when collection system was not operating for more than 5 days.	Section 2.1
§60.757(f)(5)	Location of each surface emission excess and all re-monitoring dates and concentration.	Section 2.6
§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
§63.10(d)(5)	Startup, Shutdown, Malfunction Events	Section 4.0, Appendices C & D

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

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

2.1.1 Collection System Downtime

During the period covered in this report, the GCCS was not shut down for more than five days on any one occasion. The downtime for the reporting period of October 1, 2011 through March 31, 2012 was 18.72 hours. The total downtime for the 2011 calendar year and partial 2012 calendar was 58.07 and was 12.47 hours, respectively, out of an allowable 240 hours per year.

Appendix D contains the A-7, A-8, and A-9 Flares and the Ameresco Internal Combustion (IC) engines Downtime Reports which list dates, times, and lengths of shutdowns for the reporting period and year-to-date. Appendix E contains the GCCS Downtime.

2.1.2 Well Start-Up & Disconnection Log

There were seven (7) wellfield SSM events that occurred during the reporting period. Three (3) wells were decommissioned and one (1) well was started-up during the reporting period. See Appendix C, Wellfield SSM Log for details of well disconnection and reconnection events. Start-up and Decommissioning Notification Letters were submitted to the BAAQMD and are included in Appendix G.

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

The emission control system consists of 3 flares (A-7, A-8, and A-9), which all began operation in 2004 and the 6 IC Engines operated by Ameresco. 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-7, A-8, and A-9 Flares and the IC Engines are located in Appendix D.

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

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

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

BAAQMD Regulation 8-34-501.11 and 8-34-509 are not applicable to the A-7, A-8, and A-9 Flares because the A-7, A-8, and A-9 Flares 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))

The combustion zone temperatures of the flares are monitored with Thermo-Electric Thermocouples. The temperature is displayed with a Yokogawa digital recorder, which is downloaded and archived. There were no temperature deviations during the reporting

period. Appendix F contains the Flare Temperature Deviation/ Inoperative Monitor/Missing Data Reports for October 1, 2011 through March 31, 2012.

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

The cover integrity monitoring was performed on the following dates:

- October 10, 2011
- November 17, 2011
- December 14, 2011
- January 9, 2012
- February 1, 2012
- March 20, 2012

Surface cracks were discovered during the October monitoring event. Republic was informed by American Environmental Group, Ltd (AEG) personnel of the issues and immediately fixed the cover in the area. The Monthly Cover Integrity Monitoring Logs are included in Appendix G.

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

Ox Mountain 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 Fourth Quarter 2011 and the First Quarter 2012 Instantaneous and Integrated Surface Emission Monitoring (SEM) events and RMC Geoscience, Inc. (RMC) submitted the Fourth Quarter 2011 and the First Quarter 2012 SEM Report to Republic. Refer to the Fourth Quarter 2011 and First Quarter 2012 SEM Reports, located in Appendix H, for detailed results.

2.7 Component Leak Testing (BAAQMD 8-34-501.6 & 8-34-503, CCR §95465(b)(1)(B))

Quarterly component leak testing, pursuant to BAAQMD Regulation 8-34-301.2 and CARB §95465(b)(1)(B), occurred during the reporting period on the following dates:

- Fourth Quarter 2011 – November 29 and 30, December 7, 2011
- First Quarter 2012 – February 20 and March 2, 2012

During the Fourth Quarter 2011 Component Leak Testing four (4) locations were found to have exceedances on November 30, 2011. Repairs were completed by Republic Operations personnel on December 6, 2011 and the locations were re-monitored on

December 7, 2011. No exceedances were detected. Refer to the Quarterly LFG Component Leak Monitoring Reports, located in Appendix I, for detailed results.

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

The Annual Waste Acceptance Rate was compiled for the timeframe of October 1, 2011 through March 31, 2012. The amount of waste accepted during the reporting period was approximately 324,541.32 tons. The current Waste-In-Place as of March 31, 2012 is approximately 44,296,242 cubic yards.

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

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

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

Wellhead monitoring was performed on a monthly basis pursuant to 8-34-505. The well readings for October 1, 2011 through March 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 56 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:

- October 4, 6, 12, 13, 19, 20, 25, 26, and 27, 2011
- November 2, 8, 9, 15, 16, 17, and 22, 2011
- December 1, 8, 13, 14, 20, 21, 28, and 29, 2011
- January 9, 11, 12, 24, 25, and 26, 2012
- February 7, 8, 9, 16, 20, 22, and 23, 2012
- March 7, 8, 12, 13, 20, 21, 27, and 28, 2012

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

There were 22 wells with readings that exceeded the limits set forth in BAAQMD Regulation 8-34-305 during the reporting period. Corrective action for wells was initiated within the required 5-day time period and re-monitoring was completed within 15 days of the deviation pursuant to BAAQMD Regulation 8-34-414. See Appendix K, Wellfield Deviation Log, for more detail.

2.10.2 Higher Operating Value (HOV) Wells

As of March 31, 2012, the following wells are approved to operate at a HOV for oxygen pursuant to Permit Condition 10164 Part 18b(i):

Oxygen HOV Wells

Pursuant to Permit Condition 10164, Part 18(b)(i), the oxygen concentration limit does not apply to the wells listed below, provided that the oxygen concentration in the LFG at the main header does not exceed fifteen percent oxygen by volume (dry basis): EW-W04, EW-W10, EW-W13, EW-W17, EW-W38, EW-PEW01, EW-PEW02, EW-PEW03, EW-PEW04, EW-PEW06, EW-W-1-L, HC-F06.

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

The flare LFG flow rate is measured with a Rosemount flow meter. The General Electric data panel displays the LFG flow and the digital Yokogawa data recorder records LFG flow every minute and is downloaded and saved to a compact flash card. The flare flow meter meets the requirements of BAAQMD Regulation 8-34-508 by recording data at least every 15 minutes. The flow meter is maintained and calibrated pursuant to manufacturer's recommendations. The flow data for the flare is available for review at Ox Mountain. Appendix L contains a summary of the monthly LFG flow rates for the flares. There were no issues during this reporting period. Appendix F contains the Flare Temperature Deviation/ Inoperative Monitor/Missing Data Report for October 1, 2011 through March 31, 2012. Table 2-2 below is a summary of the total LFG flow for the reporting period of October 1, 2011 through March 31, 2012.

Table 2-2 Total LFG Flow for October 1, 2011 through March 31, 2012

Emission Control Device	Average Flow (scfm)	Average CH ₄ (%)*	Total LFG Volume (scf)	Total Volume Corrected to 50% CH ₄ (scf)	Total CH ₄ Volume (scf)	Heat Input (MMBTU)
A-7	1,389.6	57.8	6,216,369.0	7,290,615.8	3,598,527.1	3,645.3
A-8	1,397.7	57.8	392,752.5	549,044.4	270,999.2	274.5
A-9	2,557.9	57.8	6,706,981.0	7,872,702.4	3,885,835.3	3,936.4

scfm = standard cubic feet per minute

CH₄ = methane

scf = standard cubic feet

*Methane content determined from the October 10, 2011 Source Test

MMBTU = million British thermal units

2.12 Compliance with §60.757(f)(5)

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

The GCCS was modified pursuant to Title V Permit Number A2266 during the reporting period.

There were 3 wells decommissioned and 1 well started-up during the reporting period, pursuant to Permit Condition 10164, Part 17b(i). Well Start-up and Decommissioning Notification Letters were submitted to the BAAQMD and are included in Appendix B.

Permit Condition 10164, Part 17b(i) allows for the replacement of an unlimited number of vertical wells, installation of up to 79 new vertical wells, installation of up to 19 new horizontal collectors, the decommissioning of up to 115 vertical wells, and the decommissioning of up to 12 horizontal collectors.

As of March 31, 2012, Ox Mountain consists of 187 vertical wells and 13 horizontal collectors.

2.13 Compliance with Title V Permit Condition Number 10164, Part 5

The unpaved segment of road extending from the end of the paved haul road to the working face does not exceed the 1,200 foot length limit.

2.14 Compliance with Title V Permit Condition Number 10164, Part 6

No vehicles exceeded the 10 mile per hour speed limit on the unpaved roads.

2.15 Compliance with Title V Permit Condition Number 10164, Part 7

All unpaved roads (excluding limited use access roads) were treated with 10 percent magnesium chloride dust suppressant solution at a rate of at least once per calendar month, during October. During November through March, dust suppressant was applied after any dry period consisting of 30 consecutive days with less than 0.09 inches of rain per day. In addition, water was applied to all unpaved roads at least four times per working day. The watering schedule was reduced during periods of sufficient precipitation to minimize dust emissions.

2.16 Compliance with Title V Permit Condition Number 10164, Part 8

All paved roadways were swept and washed down at least twice per week or as necessary to maintain a clean road surface.

2.17 Compliance with Title V Permit Condition Number 10164, Part 9

On-site vehicle traffic volume did not exceed the number of round trips described in Table 2-3 during any one day:

Table 2-3 On-Site Vehicle Traffic Volume

Vehicle Type	Daily Round Trip Limits
Transfer Trucks	178
Packer Trucks	52
Water Trucks	36
Soil Trucks	200

Vehicle Type	Daily Round Trip Limits
Misc. Heavy Equipment	60
Light Duty Vehicles	250

2.18 Compliance with Title V Permit Condition Number 10164, Part 10

Except for the vehicles listed in Table 2-4, the on-site one way distance traveled by any heavy-duty vehicle (on paved roads only) did not exceed 8,000 feet. This limitation does not apply to the vehicles listed in Table 2-4, which may travel up to a maximum of 11,700 feet (one-way distance) on paved roads:

Table 2-4 Vehicle Traffic

Vehicle Type	Daily Round Trip Limits
Water Trucks	36
Fuel Trucks	2
Employee Light-Duty Vehicles	20

2.19 Compliance with Title V Permit Condition Number 10164, Part 13

No contaminated soil containing volatile organic compound (VOC) concentrations greater than 50 parts per million (ppm) was received during this reporting period. VOC-laden soil (containing less than 50 ppm of VOCs) was received during this reporting period. The total VOC-laden soil placed did not exceed the 118.75 ton daily limit or the 31,800 ton yearly limit.

2.20 Compliance with Title V Permit Condition Number 16315 for S-12 Stockpile of Green Waste

Appendix O contains monthly records of the amount of yard and green waste received for this reporting period. Monthly yard and green waste throughput totals for the reporting period are listed in Table 2-5:

Table 2-5 Yard and Green Waste Accepted for S-12

Month	Total Throughput (tons)
October 2011	4,229.70
November 2011	3,925.11
December 2011	9,775.63
January 2012	3,265.56
February 2012	3,021.31
March 2012	2,932.65
TOTAL:	27,149.96

These records are maintained at Ox Mountain and are available upon request.

2.21 Compliance with Title V Permit Condition Numbers 7523 and 16516 for S-5 Non-Retail Gasoline Dispensing Facility G#8524

Ox Mountain's gasoline throughput for the period of October 1, 2011 through March 31, 2012 is 3,370 gallons. Ox Mountain's annual gasoline throughput for the period of April 1, 2011 through March 31, 2012 is 6,522 gallons. The facility's annual gasoline throughput did not exceed the 400,000 gallon limit in any consecutive 12-month period.

Pursuant to Title V Permit Condition Number 16516, the Static Pressure Performance Test (Leak Test) for ST-38 was performed on December 5, 2011. ST passed the 2011 Leak Test. The Static Pressure Performance Test results are included in Appendix P of this Combines Report.

3 PERFORMANCE TEST REPORT

In accordance with BAAQMD Rule 8-34-413 and 40 CFR §60.757(g) in the NSPS, a Performance Test Report is required to be submitted from subject facilities containing performance and monitoring data for the operation of the GCCS. The operational records listed in Table 3-1 have been reviewed, summarized, and are included in the Performance Test Report section of this report. A copy of the most recent Performance Test conducted on October 10, 2011 is included in Appendix N.

Table 3-1 Performance Test Requirements

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

3.1 Flare (A-7, A-8, and A-9) Compliance Demonstration Test Results (BAAQMD 8-34-412)

The Compliance Demonstration Test (Performance Test) was performed on the A-7, A-8, and A-9 Flares by Blue Sky Environmental, Inc. on October 10, 2011, pursuant to BAAQMD Regulation 8-34-412. The results of the Performance Test for the A-7, A-8, and A-9 Flares indicate that the flares are in compliance with BAAQMD Regulation 8-34-301.3. As required by BAAQMD Regulation 8-34-301.3, the A-7, A-8, and A-9 Flares meet the non-methane organic compound (NMOC) emission concentration of less than 30 parts per million by volume (ppmv). Pursuant to Title V Permit Condition Number 10164 Part 28, the A-7, A-8, and A-9 Flares meet the nitrogen oxide (NO_x) emission concentration of less than 39 ppmv, corrected to 3 percent oxygen. Pursuant to Title V Permit Condition Number 10164 Part 28, the A-7, A-8, and A-9 Flares meet the NO_x (calculated as NO₂) emission concentration of less than 0.052 pounds per million British thermal units (lb/MMBtu). Pursuant to Title V Permit Condition Number 10164 Part 29, the A-7, A-8, and A-9 Flares meet the carbon monoxide (CO) emission concentration of less than 184 ppmv, corrected to 3 percent oxygen. Pursuant to Title V Permit Condition Number 10164 Part 29, the A-7, A-8, and A-9 Flares meet the CO emission concentration of less than 0.15 pounds per million British thermal units (lb/MMBtu). Lastly, the A-7, A-8, and A-9 Flares meet the total reduced sulfur concentration of less than 150 ppmv (reported as H₂S, dry basis), pursuant to Title V Permit Condition Number 10164, Part 21. Table 3-2 shows the results of the A-4 Flare Performance Test, averaged from three test runs. A copy of this Performance Test Report is included in Appendix N.

Table 3-2 Flare Compliance Demonstration Test Results

Condition	Flare (A-7) Average Results	Flare (A-8) Average Results	Flare (A-9) Average Results	8-34-301.3 limit	Compliance Status
NMOC (ppmv @ 3% O ₂ as Methane)	<5.6	<5.1	<4.8	<30	In Compliance
NMOC Destruction Efficiency (%)	>98.3%	>98.4%	>99.2%	>98%	In Compliance
NO _x (ppm @ 3% O ₂)	33.7	34.6	39.3	39	In Compliance
NO _x (lbs/MMBtu)	0.043	0.042	0.051	0.052	In Compliance
CO (ppm @ 3% O ₂)	88.8	52.3	64.4	184	In Compliance
CO (lbs/MMBtu)	0.07	0.04	0.05	0.15	In Compliance
LFG H ₂ S ppm*	103	87.7	112	150	In Compliance

3.2 Compliance with §60.757(G)(1)

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

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

3.3 Compliance with §60.757(G)(2)

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

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

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

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

3.4 Compliance with §60.757(G)(3)

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

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

3.5 Compliance With §60.757(G)(4)

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

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

3.6 Compliance With §60.757(G)(5)

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

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

3.7 Compliance with §60.757(G)(6)

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

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

- Fourth Quarter 2011 – October 5, November 3 and 4, 2011
- First Quarter 2012 – February 20, 2012 and March 16 and 27, 2012

In the Fourth Quarter 2011 Probe and building monitoring events, no methane gas in excess of the lower explosive limit (LEL) of 5 percent by volume was detected at any perimeter gas probe location tested with the exception of GP06A, GP06B, and GP06C. The locations were continually monitored on a weekly basis to help monitor system performance.

In the First Quarter 2012 Probe and building monitoring events, no methane gas in excess of the LEL of 5 percent by volume was detected at any perimeter gas probe location tested with the exception of GP20A, GP20B, and GP20C. The locations were continually monitored on a monthly basis to help monitor system performance.

The LFG Probe and In-Structure Monitoring Reports are included in Appendix M.

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

4 STARTUP, SHUTDOWN, MALFUNCTION (SSM) PLAN

SSM Log for the GCCS at Ox Mountain

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 (October 1, 2011 through March 31, 2012). The following information is included as required:

- During the reporting period, eight (8) A-7 Flare SSM events occurred. The A-7 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, four (4) 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, 31 A-9 Flare SSM events occurred. The A-9 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, 7 Wellfield SSM events occurred. Details are included in Appendix C, Well SSM Log.
- There were 50 events in total. In all 50 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)).