February 28, 2025
File No. 01204082.01, Task 30

TV Tracking #1096 (Semi-Annual)

1. ☐ RECEIVED IN ENFORCEMENT: 02/28/2025

Mr. Jeffrey Gove
Director of Compliance and Enforcement
Bay Area Air Quality Management District
375 Beale Street, Suite 600
San Francisco, California 94105

Subject: **Title V Semi-Annual Report of Required Monitoring; BAAQMD Rule 8-34 Semi-Annual Report, NESHAP and Semi-Annual SSM Plan Report; Potrero Hills Landfill, Suisun, California (Plant No. A2039)**

Mr. Gove:

On behalf of Potrero Hills Landfill Inc. (Potrero), SCS Engineers (SCS) is submitting the Title V Semi-Annual Report of Required Monitoring; Bay Area Air Quality Management District (BAAQMD), Regulation 8, Rule 34 Semi-Annual Report; Semi-Annual Startup, Shutdown and Malfunction (SSM) Plan Report, and the National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Potrero Hills Landfill in Suisun, California (Plant # A2039) to the Bay Area Air Quality Management District (BAAQMD).

The Title V Semi-Annual Report of Required Monitoring, the BAAQMD Rule 8-34 Semi-Annual Report, NESHAP and the SSM Plan Report cover the period from August 1, 2024 through January 31, 2025.

The Title V report meets the requirements specified in the Title V permit, BAAQMD guidance on Title V report submittals, and Regulation 2, Rule 6. The Title V report also includes a certification by the responsible official for the Potrero Hills Landfill, Inc. The Rule 8-34 report includes the information required by BAAQMD Rule 8-34-411. This report also satisfies the reporting requirement under the revised NESHAP rule. The semi-annual report also satisfies the requirements under the New Source Performance Standards (NSPS) for municipal solid waste landfills (40 California Code of Regulation [CFR] Part 60, Subpart WWW and 40 CFR Part 62, Subpart OOO (through compliance with the NESHAP) which became effective on July 21, 2021), and Emission Guidelines (EG), including 40 CFR 60.757(f). The Semi-Annual SSM Plan Report satisfies the requirements under the NESHAP rule for semi-annual reporting of SSM Plan implementation including 40 CFR 63.10(d)(5)(i). This report includes a certification by the responsible official for Potrero Hills Landfill, Inc.

If you have any questions or need any additional information, please contact the undersigned at (562) 355-6510.

Sincerely,

Hannah Morse
Associate Staff Professional
SCS ENGINEERS

Gabrielle Stephens
Project Director/Vice President
SCS ENGINEERS

Enclosures:

Title V Semi-Annual Monitoring Report (with Certification Statement)
BAAQMD Rule 8-34 and NESHAP Semi-Annual Report
Semi-Annual SSM Plan Report (with Certification Statement)

cc: USEPA Region 9
Natalie Hicks; Waste Connections
Kevin Iler, Waste Connections
Curt Fujii; Waste Connections
Pat Sullivan; SCS Engineers
Art Jones, SCS Field Services

POTRERO HILLS LANDFILL, INC.

TITLE V SEMI-ANNUAL MONITORING REPORT

SITE: POTRERO HILLS LANDFILL	**FACILITY ID#:** A2039
REPORTING PERIOD: *from* 08/01/2024	*through* 01/31/2025

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

2/28/25
Date

Kevin Iler
Name of Responsible Official (please print)

Site Manager
Title of Responsible Official (please print)

Mail to:

Director of Compliance and Enforcement
BAAQMD
375 Beale Street, Suite 600
San Francisco, CA 94105
Attn: Title V reports

POTRERO HILLS LANDFILL, INC.

TITLE V SEMI-ANNUAL MONITORING REPORT

SITE: POTRERO HILLS LANDFILL	**FACILITY ID#:** A2039
REPORTING PERIOD: *from* 08/01/2024	*through* 01/31/2025

List of Permitted Sources and Abatement Device

Permit Unit Number	**Equipment Description**
S-#	**Description**
S-1	Potrero Hills MSW Landfill – Waste Decomposition Process; Equipped with Landfill Gas Collection System
S-202	Potrero Hills MSW Landfill – Waste and Cover Material Dumping
S-203	Potrero Hills MSW Landfill – Excavating, Bulldozing and Compacting Activities
S-13	Diesel IC Engine for Power Generation
S-14	Non-retail Gasoline Dispensing Facility
A-2	Landfill Gas Flare
A-4	Landfill Gas Flare

Notes:

S-13 (Diesel generator engine): No longer in service; and has not operated since prior to the start of the reporting period.

S-1, S-202, S-203, A-2, - Change of Condition (for Condition # 1948) issued in February 2014. These changes in the annual cumulative decomposable tonnage limits have not yet been incorporated into the Title V Permit.

S-33 (Emergency Diesel Engine-Generator) is currently operating under a Permit to Operate (PTO) issued on November 6, 2018, which has not yet been incorporated into the Title V Permit. All permit conditions have been reviewed for monitoring requirements and the site is in compliance.

S-36 (Emergency Diesel Engine-Generator) is currently operating under a PTO issued on November 6, 2018, which has not yet been incorporated into the Title V Permit. All permit conditions have been reviewed for monitoring requirements and the site complied with all permit conditions during the reporting period.

S-15, S-20, S-21, S-23, (Miscellaneous sources including stockpiles, composting, quarrying, and diesel engine): These sources are currently operating under PTOs issued in July 2015, which have not yet been incorporated into the Title V Permit. All permit conditions have been reviewed for monitoring requirements and the site is in compliance.

S-35, S-37, S-38, and S-39 (Tipper Engines): Tipper engines S-35 and S-37 were both operating under a PTO issued in February 2016, which had not yet been incorporated into the Title V Permit. On December 19, 2019, an Authority to Construct (ATC) for a replacement engine (S-38) for S-35 was issued. S-35 was permanently decommissioned on February 15, 2020, which was the same day S-38 commenced operation. The PTO for S-37 and S-38 was issued on March 4, 2020. In addition, on June 10, 2020 an ATC for a replacement engine (S-39) for S-37 was issued. S-37 was permanently decommissioned on August 8, 2020, and the new S-39 engine commenced operation on August 11, 2020. A PTO for S-39 was issued on August 20, 2020. All permit conditions for these tipper engines have been reviewed for monitoring requirements and the site is in compliance.

Potrero Hills has been operating under compliance agreement with BAAQMD, effective 5/24/18. The Compliance Agreement has been extended ten times, and the current Agreement expires on December 17, 2025. Condition #5 of the agreement states “PHL shall provide data to the District within 14 calendar days of BAAQMD requests for information for the proposed landfill expansion project, Application #27654.” Note, on one (1) occasion PHL responded to a BAAQMD request 19 days after the initial request sent on August 1, 2024, and therefore was intermittently in compliance with this condition.

POTRERO HILLS LANDFILL, INC.

TITLE V SEMI-ANNUAL MONITORING REPORT

Site: Potrero Hills Landfill	**Facility ID#:** A2039
Permitted Unit: S-1 POTRERO HILLS LANDFILL, A-2 LANDFILL GAS FLARE AND A-4 LANDFILL GAS FLARE; S-202 WASTE AND COVER MATERIAL DUMPING; S-203 EXCAVATING, BULLDOZING, AND COMPACTING ACTIVITIES	**Reporting Period:** *from* 08/01/2024 *through* 01/31/2025

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 # 1948, Parts 13b-c and 13f-g	Records	Periodic / On event basis	BAAQMD 8-34-304.1	For Inactive/Closed Areas: collection system components must be installed and operating by 2 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 # 1948, Parts 13b-c and 13f-g	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

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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 # 1948, Parts 13a-c and 13f-g	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, and Condition 1948, Part 13h	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	Continuous	N/A

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Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
Gas Flow	BAAQMD Condition # 1948, Parts 13 f-h	Records of Landfill Gas Flow Rates, Collection and Control Systems Downtime, and Collection System Components	Periodic / Daily	BAAQMD Condition # 1948, 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	$\leq$ 240 hours per year and $\leq$ 5 consecutive days	Continuous	N/A
Periods of Inoperation for Parametric Monitors	BAAQMD 1-523.4	Operating Records for All Parametric Monitors	Periodic / Daily	BAAQMD 1-523.2	$\leq$ 15 consecutive days per incident and $\leq$ 30 calendar days per 12-month period	Continuous	N/A

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Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
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	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	Applies to all wells, except as specified in Condition #1948, Part 21: < 55 º C	Intermittent	HOV requests for all wells have been pending since May 6, 2022.

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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 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	Applies to all wells, except as specified in Condition #1948, Part 21: N_2 < 20% by volume **OR** O_2 < 5% by volume	Continuous	N/A
Alternate Operating Parameters for Specified Wellheads	BAAQMD Condition #1948, Part 21b	Monthly Inspection and Records	Periodic / Monthly/Weekly	BAAQMD Condition #1948, Part 21a	Applies to Specified Wells: Gas temperature: < 145 °F (< 63 °C) AND N_2 < 10% by volume OR O_2 < 5% by volume	Continuous	N/A

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Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
Carbon Monoxide for Specified Wells Subject to Alternate Wellhead Operating Parameters	BAAQMD Condition #1948, Part 21d	Monthly Inspection and Records	Periodic / Monthly/Weekly	BAAQMD Condition #1948, Part 21d	Applies to Specified Wells: < 200 ppmv, no action; > 200 ppmv but ≤ 500 ppmv, weekly monitoring; > 500 ppmv – well must be shutdown and further CO analysis performed within 1 week.	Continuous	N/A
Well Shutdown Limits for Well Raising	BAAQMD 8-34-116.5 and 501.1	Records	Periodic / Daily	BAAQMD 8-34-116.2	No more than 5 wells at a time or 10% of total collection system, whichever is less	Continuous	N/A
Well Shutdown Limits for Well Raising	BAAQMD 8-34-116.5 and 501.1	Records	Periodic / Daily	BAAQMD 8-34-116.3	≤ 24 consecutive hours per well	Continuous	N/A

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Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
Well Shutdown Limits Repair, Construction, Fire	BAAQMD 8-34-117.6 and 501.1	Records	Periodic / Daily	BAAQMD 8-34-117.4	No more than 5 wells at a time or 10% of total collection system, whichever is less	Continuous	N/A
Well Shutdown Limits Repair, Construction, Fire	BAAQMD 8-34-117.6 and 501.1	Records	Periodic / Daily	BAAQMD 8-34-117.5	≤24 consecutive hours per well	Continuous	N/A
Landfill Construction Activity Limits	BAAQMD 8-34-118.9 and 501.1	Records	Periodic / Daily	BAAQMD 8-34-118.5	Excavated refuse covered immediately and disposed of ≤24 hours	Continuous	N/A
Landfill Construction Activity Limits	BAAQMD 8-34-118.9 and 501.1	Records	Periodic / Daily	BAAQMD 8-34-118.6	Drilled wells and excavated trenches covered ≤ 8 hours	Continuous	N/A
TOC (Total Organic Com-pounds Plus Methane)	BAAQMD 8-34-501.6 and 503	Quarterly Inspection of collection and control system components with OVA and Records	Periodic / Quarterly	BAAQMD 8-34-301.2	Component leak limit: ≤1000 ppmv as methane	Continuous	N/A

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Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
TOC	BAAQMD 8-34-415, 416, 501.6, 506 and 510	Monthly Visual Inspection of Cover, Quarterly Inspection with OVA of Surface, 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	Continuous	N/A
Non-Methane Organic Compounds (NMOC)	BAAQMD 8-34-412 and 8-34-501.4 and BAAQMD Condition # 1948, Part 11	Initial and Annual Source Tests and Records	Periodic / Annual	BAAQMD 8-34-301.3	≥ 98% removal by weight OR < 30 ppmv, dry basis @ 3% O_2, expressed as methane (applies to A-2 and A-4 Flares only)	Continuous	N/A

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Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
Temperature of Combustion Zone (CT)	BAAQMD 8-34-501.3, and 507, and BAAQMD Condition # 1948, Part 13i	Temperature Sensor and Recorder (continuous)	Continuous	BAAQMD Condition # 1948, Part 9	CT $\geq$ 1504 °F, averaged over any 3-hour period (applies to A-2 Flare only)	Continuous	N/A
Temperature of Combustion Zone (CT)	BAAQMD 8-34-501.3 and 507, and BAAQMD Condition # 1948, Part 13i	Temperature Sensor and Recorder (continuous)	Continuous	BAAQMD Condition# 1948, Part 9	CT ≥1467 °F, averaged over any 3-hour period (applies to A-4 Flare only)	Continuous	N/A
Total Carbon	BAAQMD Condition # 1948, Part 3	Records	Periodic / On Daily	BAAQMD 8-2-301	$\leq$ 15 pounds/day or $\leq$ 300 ppm, dry basis (applies only to aeration of or use as cover soil of ≤ 50 ppmw of volatile organic compounds)	Continuous	N/A
Volatile Organic Compounds	BAAQMD Condition # 1948, Parts 2 and 13d	Records	Periodic / On event basis	BAAQMD Condition # 1948, Part 2	Facility shall not accept soil containing more than 50 ppmw of VOC	Continuous	N/A

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Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
Opacity	BAAQMD Condition # 1948 Part 13e	Records of all site watering and road cleaning events	Periodic / On event basis, Monthly	BAAQMD 6-1-301	Ringelmann No. 1 for ≤ 3 minutes/hr (applies to S-202 and S-203)	Continuous	N/A
Opacity	None	N/A	None	BAAQMD 6-1-301	Ringelmann No. 1 for < 3 minutes/hr (applies to A-2 and A-4 Flares)	Continuous	N/A
FP	None	N/A	None	BAAQMD 6-1-310	≤ 0.15 grains/dscf (applies to A-2 and A-4 Flares only)	Continuous	N/A
Opacity	BAAQMD Condition# 1948, Part 13e	Records of all site watering and road cleaning events	Periodic / On event basis, Monthly	SIP 6-301	Ringelmann No. 1 for ≤ 3 minutes/hr (applies to S-202 and S-203)	Continuous	N/A
Opacity	None	N/A	None	SIP 6-301	Ringelmann No. 1 for < 3 minutes/hr (applies to A-2 Flare)	Continuous	N/A

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Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
FP	None	N/A	None	SIP 6-310	≤ 0.15 grains/dscf (applies to A-2 and A-4 Flares only)	Continuous	N/A
SO_2	None	N/A	None	BAAQMD 9-1-301	Property Line Ground Level Limits: ≤ 0.5 ppm for 3 minutes and ≤ 0.25 ppm for 60 min. and ≤ 0.05 ppm for 24 hours (applies to A-2 and A-4 Flares only)	Continuous	N/A
SO_2	BAAQMD Condition # 1948, Parts 10, 11d, and13j	Sulfur analysis of landfill gas and source test	Periodic / Quarterly	BAAQMD Regulation 9-1-302	≤ 300 ppm, (dry basis) (applies to A-2 and A-4 Flares only)	Continuous	N/A

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Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
Total Sulfur Content in Landfill Gas	BAAQMD Condition # 1948, Part 10 and 13j	Sulfur analysis of landfill gas	Periodic / Quarterly	BAAQMD Condition # 1948, Part 10	≤ 560 ppmv of TRS, expressed as H_2S, or (≤504 ppmv of hydrogen sulfide (H_2S), when measured using a Draeger Tube	Continuous	N/A
H_2S	BAAQMD Condition # 1948, Part 16	Monitoring to be proposed by operator	Periodic / On event basis	BAAQMD 9-2-301	Property Line Ground Level Limits: ≤ 0.06 ppm, averaged over 3 minutes and ≤ 0.03 ppm averaged over 60 min.	Continuous	N/A
Amount of Waste Accepted	BAAQMD Condition # 1948, Part 13a	Records	Periodic / Daily	BAAQMD Condition # 1948, Part 1a	≤ 4430 tons/day	Continuous	N/A

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Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
Amount of Waste Accepted	BAAQMD Condition # 1948, Part 13a	Records	Periodic / Daily	BAAQMD Condition # 1948, Part 1b	≤13,100,000 tons (cumulative amount of all decomposable materials placed in landfill)	Intermittent (see following comment)	Limit increased to 16,350,000 tons per current Condition #1948; Limit has been exceeded while Potrero awaits permit for landfill expansion. Note that Potrero has provided documentation (per Cond 1948, #1b) that shows the POC limit has not been exceeded. Also, compliance status related to delayed expansion permitting is being determined as part of Potrero's current Compliance Agreement with BAAQMD, effective 5/24/18. The Compliance Agreement has been extended ten times, and the current Agreement expires on December 17, 2025.

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Amount of Waste Accepted	BAAQMD Condition # 1948, Part 13a	Records	Periodic / Daily	BAAQMD Condition # 1948, Part 1c	≤21,800,000 yd^3 (cumulative amount of all wastes and cover materials placed in landfill)	Intermittent (see following comment)	Limit has been exceeded while Potrero awaits permit for landfill expansion. Note that Potrero has provided documentation (per Cond 1948, #1c) that shows the POC limit has not been exceeded. Also, compliance status related to delayed expansion permitting is being determined as part of Potrero's current Compliance Agreement with BAAQMD, effective 5/24/18. The Compliance Agreement has been extended ten times, and the current Agreement expires on December 17, 2025.
Heat Input	BAAQMD Condition # 1948, Part 8	Records	Periodic / Daily	BAAQMD Condition # 1948, Part 8	For A-2 and A-4 combined: ≤2,049.3 MM BTU per day and ≤748,000 MM BTU per year	Continuous	N/A

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TITLE V SEMI-ANNUAL MONITORING REPORT

Site: Potrero Hills Landfill	**Facility ID#:** A2039
Permitted Unit: S-1 POTRERO HILLS LANDFILL, A-2 LANDFILL GAS FLARE AND A-4 LANDFILL GAS FLARE; S-202 WASTE AND COVER MATERIAL DUMPING; S-203 EXCAVATING, BULLDOZING, AND COMPACTING ACTIVITIES	**Reporting Period:** *from* 08/01/2024 *through* 01/31/2025

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
Heat Input	BAAQMD Condition #1948, Part 8	Records	Periodic / Daily	BAAQMD Condition #1948, Part 8a	For A-2: ≤ 1,080 MM BTU per day and ≤ 394,200 MM BTU per year	Continuous	N/A
Heat Input	BAAQMD Condition #1948, Part 8	Records	Periodic / Daily	BAAQMD Condition #1948 Part 8b	For A-4: ≤ 1,728 MM BTU per day ≤ 630,720 MM BTU per year	Continuous	N/A
NOx	BAAQMD Condition #1948, Parts 11 and 20	Source testing	Periodic / On Event Basis	BAAQMD Condition #1948 Part 17	≤ 0.06 pounds per million BTU, calculated as NO_2 (applies to A-4 Flare only)	Continuous	N/A
CO	BAAQMD Condition #1948, Parts 11 and 20	Source testing	Periodic / On Event Basis	BAAQMD Condition #1948, Part 18	≤ 0.2 pounds per million BTU (applies to A-4 Flare only)	Continuous	N/A
CO	BAAQMD Condition #1948, Parts 11 and 20	Source testing and emission calculations	Periodic / On Event Basis	BAAQMD Condition #1948, Part 19	≤ 165,500 pounds (≤ 82.25 tons) in any consecutive 12-month period from A-2 and A-4 combined	Continuous	N/A

POTRERO HILLS LANDFILL, INC.

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Permitted Unit: S-1 POTRERO HILLS LANDFILL, A-2 LANDFILL GAS FLARE AND A-4 LANDFILL GAS FLARE; S-202 WASTE AND COVER MATERIAL DUMPING; S-203 EXCAVATING, BULLDOZING, AND COMPACTING ACTIVITIES	**Reporting Period:** *from* 08/01/2024 *through* 01/31/2025

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
Startup Shutdown or Malfunction Procedures	40 CFR 63.1980(a-b)	Records (all occurrences, duration of each, corrective actions)	Periodic / On event basis	40 CFR 63.6l	Minimize Emissions by Implementing SSM Plan	Continuous	N/A

POTRERO HILLS LANDFILL, INC.

TITLE V SEMI-ANNUAL MONITORING REPORT

Site: Potrero Hills Landfill	**Facility ID#:** A2039
Permitted Unit: S-13 DIESEL IC ENGINE FOR POWER GENERATION	**Reporting Period:** *from* 08/01/2024 *through* 01/31/2025

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
Opacity	BAAQMD Condition # 18996, Part 2	Observation for visible smoke	Periodic / On event basis	BAAQMD 6-1-303	Ringelmann 2.0 for ≤ 3 minutes in any hour	Continuous	N/A
FP	None	N/A	None	BAAQMD 6-1-310	≤ 0.15 gr/dscf	Continuous	N/A
Opacity	BAAQMD Condition # 18996, Part 2	Observation for visible smoke	Periodic / On event basis	SIP Regulation 6-303	Ringelmann 2.0 for ≤ 3 minutes in any hour	Continuous	N/A
FP	None	N/A	None	SIP Regulation 6-310	≤ 0.15 gr/dscf	Continuous	N/A
Diesel PM	CCR Title 17, §93115.13(a)	Source test data	Periodic / On event basis	CCR Title 17, §93115.7(b)(1)	For non-certified engines: 85% reduction from baseline levels or 0.01 g/bhp-hr	Continuous	N/A
Nox	BAAQMD Regulation 9-8-501, 9-8-503	Initial Source Test and Portable Analyzer	P-Initial and P/Q	BAAQMD Regulation 9-8-304.2	≤110 ppmv, corrected to 15% oxygen, dry basis	Continuous	N/A
CO	BAAQMD Regulation 9-8-501, 9-8-503	Initial Source Test and Portable Analyzer	P-Initial and P/Q	BAAQMD Regulation 9-8-304.2	≤310 ppmv, corrected to 15% oxygen, dry basis	Continuous	N/A
SO_2	None	N/A	None	BAAQMD 9-1-301	Property Line Ground Level Limits: ≤ 0.5 ppm for 3 minutes and ≤ 0.25 ppm for 60 min. and ≤	Continuous	N/A

POTRERO HILLS LANDFILL, INC.

TITLE V SEMI-ANNUAL MONITORING REPORT

Site: Potrero Hills Landfill	**Facility ID#:** A2039
Permitted Unit: S-13 DIESEL IC ENGINE FOR POWER GENERATION	**Reporting Period:** *from* 08/01/2024 *through* 01/31/2025

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
					0.05 ppm for 24 hours		
Fuel Sulfur Content	BAAQMD Condition # 18996, Part 1	Vendor certification	Periodic / On event basis	BAAQMD 9-1-304	≤ 0.5% sulfur by weight	Continuous	N/A
Fuel Sulfur Content	BAAQMD Condition # 18996, Part 1	Vendor certification	Periodic / On event basis	BAAQMD Condition # 18996, Part 1	≤ 0.5% sulfur by weight	Continuous	N/A
Fuel Sulfur Content	BAAQMD Condition # 18996, Part 1	Vendor certification	Periodic / On event basis	CCR Title 17, §93115.5(a)	CARB diesel 0.0015% sulfur by weight and aromatic HC <10% by volume; alternative diesel fuel; or fuel meeting the Verification Procedure	Continuous	N/A
Maintenance Criteria	40 CFR Part 63, Subpart ZZZZ, Sections 63.6625, 63.6640(a), and Table 6(9)(a)	Maintenance plan and records	Periodic / On event basis	40 CFR Part 63, Subpart ZZZZ, Sections 63.6603(a), 63.6640(a), Table 2d(1)(a)	Change Oil and Filter every 1,000 hours of operation or annually, whichever comes first	Continuous	N/A
Maintenance Criteria	40 CFR Part 63, Subpart ZZZZ, Sections 63.6625, 63.6640(a), and Table 6(9)(a)	Maintenance plan and records	Periodic / On event basis	40 CFR Part 63, Subpart ZZZZ, Sections 63.6603(a), 63.6640(a), Table 2d(1)(b)	Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary	Continuous	N/A
Maintenance Criteria	40 CFR Part 63, Subpart ZZZZ, Sections 63.6625,	Maintenance plan and records	Periodic / On event basis	40 CFR Part 63, Subpart ZZZZ, Sections 63.6603(a),	Inspect all hoses and belts every 500 hours of operation or	Continuous	N/A

POTRERO HILLS LANDFILL, INC.

TITLE V SEMI-ANNUAL MONITORING REPORT

Site: Potrero Hills Landfill	**Facility ID#:** A2039
Permitted Unit: S-13 DIESEL IC ENGINE FOR POWER GENERATION	**Reporting Period:** *from* 08/01/2024 *through* 01/31/2025

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
	63.6640(a), and Table 6(9)(a)			63.6640(a), Table 2d(1)(c)	annually, whichever comes first, and replace as necessary		

POTRERO HILLS LANDFILL, INC.

TITLE V SEMI-ANNUAL MONITORING REPORT

Site: Potrero Hills Landfill	**Facility ID#:** A2039
Permitted Unit: S-14 NON-RETAIL GASOLINE DISPENSING FACILITY	**Reporting Period:** *from* 08/01/2024 *through* 01/31/2025

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
Gasoline Throughput	BAAQMD 8-7-501.1 and 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 8-7-501.1 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	BAAQMD Condition # 25107	Static pressure performance test, ST-38	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
Organic Compounds	BAAQMD Condition # 25107	Static pressure performance test, ST-38	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

POTRERO HILLS LANDFILL, INC.

TITLE V SEMI-ANNUAL MONITORING REPORT

Site: Potrero Hills Landfill	**Facility ID#:** A2039
Permitted Unit: S-14 NON-RETAIL GASOLINE DISPENSING FACILITY	**Reporting Period:** *from* 08/01/2024 *through* 01/31/2025

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
Organic Compounds	SIP 8-5-403 and 8-5-503	Semi-Annual Inspection with Portable Hydro-carbon Detector	Periodic / On event basis	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
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	CARB Certification Procedures	Periodic / On event basis	BAAQMD 8-7-302.8	≥ 5ml per gallon dispensed, when dispensing rate >5 gallons/minute	Continuous	N/A
Liquid Retain from Nozzles	CARB EO	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	CARB Certification Procedures	Periodic / On event basis	BAAQMD 8-7-302.13	≤1.0 ml per nozzle per test	Continuous	N/A

POTRERO HILLS LANDFILL, INC.

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Site: Potrero Hills Landfill	**Facility ID#:** A2039
Permitted Unit: S-14 NON-RETAIL GASOLINE DISPENSING FACILITY	**Reporting Period:** *from* 08/01/2024 *through* 01/31/2025

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
Pressure-Vacuum Valve Settings	CARB EO	CARB Certification Procedures	Periodic / On event basis	BAAQMD 8-7-316 and CARB EO	Pressure Setting: ≥2.5 inches of water, gauge	Continuous	N/A
Pressure-Vacuum Valve Settings	SIP 8-5-403 and CARB EO	Semi-Annual Inspection and CARB Certification Procedures	Periodic / On event basis	SIP 8-5-303.1	Pressure Setting: ≥10% of maximum working pressure or ≥0.5 psig	Continuous	N/A
Organics	CARB EO and BAAQMD 8-7-301.13 and 8-7-407 and BAAQMD Condition # 25107 40 CFR Part 63 Subpart CCCCCC	Annual Check for Vapor Tightness and Proper Operation of Vapor Recovery System	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