

August 31, 2025
File No. 01204082.01, Task 30

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

TV Tracking #1190 (Semi-Annual)
TV Tracking #1191 (Annual)

1. RECEIVED IN
ENFORCEMENT: 08/29/2025

Subject: Title V Annual Compliance Certification Report; 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 Annual Compliance Certification Report; 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 Annual Compliance Certification Report covers the period from August 1, 2024 through July 31, 2025. 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 February 1, 2025 through July 31, 2025.

The Title V reports meet the requirements specified in the Title V permit, BAAQMD guidance on Title V report submittals, and Regulation 2, Rule 6. Each 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.

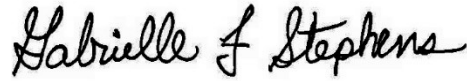


Mr. Jeffrey Gove
Director of Compliance and Enforcement
August 31, 2025
Page 2

Sincerely,



Hannah Morse
Staff Scientist
SCS ENGINEERS



Gabrielle Stephens
Vice President
SCS ENGINEERS

Enclosures:

Title V Annual Compliance Certification Report (with Certification Statement)
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: <i>from</i> 02/01/2025 <i>through</i> 07/31/2025	

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

8-29-25

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: <i>from</i> 02/01/2025 <i>through</i> 07/31/2025	

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 02/01/2025 through 07/31/2025

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

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 02/01/2025 through 07/31/2025

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 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

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 02/01/2025 through 07/31/2025

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	≤ 240 hours per year and ≤ 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	≤ 15 consecutive days per incident and ≤ 30 calendar days per 12-month period	Continuous	N/A

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 02/01/2025 through 07/31/2025

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 ° C	Intermittent	HOV requests for all wells have been pending since May 6, 2022.

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 02/01/2025 through 07/31/2025

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

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 02/01/2025 through 07/31/2025

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

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 02/01/2025 through 07/31/2025

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 Compounds 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

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 02/01/2025 through 07/31/2025

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	Intermittent	Notice of Violation (NOV) Number A63615 was issued to Potrero on June 26, 2025 for an alleged violation of regulation 8 rule 34 section 303. On June 23, 2025 during a district site visit, district personnel noted surface emissions above the permitted limit of 500 ppmv at two (2) locations. After repairs in the area near the alleged exceedances, the locations were below the permitted limit before end of day June 24, 2025. See Attachment A for 30-Day Response to NOV Number A63615.

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 02/01/2025 through 07/31/2025

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
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	$\geq 98\%$ 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
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 ≥ 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

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 02/01/2025 through 07/31/2025

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
Total Carbon	BAAQMD Condition # 1948, Part 3	Records	Periodic / On Daily	BAAQMD 8-2-301	≤ 15 pounds/day or ≤ 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
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

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 02/01/2025 through 07/31/2025

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	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
FP	None	N/A	None	SIP 6-310	≤ 0.15 grains/dscf (applies to A-2 and A-4 Flares only)	Continuous	N/A

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 02/01/2025 through 07/31/2025

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
SO ₂	None	N/A	None	BAAQMD 9-1-301	Property Line Ground Level Limits: ≤ 0.5 ppm for 3 minutes and ≤ 0.25 ppm for 60 min. and ≤ 0.05 ppm for 24 hours (applies to A-2 and A-4 Flares only)	Continuous	N/A
SO ₂	BAAQMD Condition # 1948, Parts 10, 11d, and 13j	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
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 ₂ S, or (≤504 ppmv of hydrogen sulfide (H ₂ S), when measured using a Draeger Tube	Continuous	N/A

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 02/01/2025 through 07/31/2025

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
H ₂ S	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

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 02/01/2025 through 07/31/2025

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.

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 02/01/2025 through 07/31/2025

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 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

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 02/01/2025 through 07/31/2025

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: $\leq 1,080$ MM BTU per day and $\leq 394,200$ 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: $\leq 1,728$ MM BTU per day $\leq 630,720$ 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	$\leq 165,500$ pounds (≤ 82.25 tons) in any consecutive 12-month period from A-2 and A-4 combined	Continuous	N/A

POTRERO HILLS LANDFILL, INC.

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 02/01/2025 through 07/31/2025

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 02/01/2025 through 07/31/2025

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 02/01/2025 through 07/31/2025

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: <i>from</i> 02/01/2025 <i>through</i> 07/31/2025

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 02/01/2025 through 07/31/2025

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 02/01/2025 through 07/31/2025

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 Hydrocarbon 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.

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 02/01/2025 through 07/31/2025

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: $\geq 10\%$ 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

Attachment A: 30-Day Response to NOV Number A63615

July 25, 2025
Project No. 01204082.01, Task 30

Mr. Jeffrey Gove
Director of Compliance and Enforcement
Bay Area Air Quality Management District
375 Beale Street
San Francisco, CA 94105
(415) 749-5067

**Subject: 30-DAY RESPONSE TO NOTICE OF VIOLATION NUMBER A63615
POTRERO HILLS LANDFILL (FACILITY NO. A2039)**

Dear Mr. Gove:

On behalf of the Potrero Hills Landfill, Inc. (PHLF), SCS Engineers (SCS) submits this 30-Day Response to Notice of Violation (NOV) Number A63615. NOV number A63615 was issued by Bay Area Air Quality Management District (BAAQMD or District) Inspector, Ms. Lily Law, to PHLF on June 26, 2025 and can be found in **Attachment A**. A 10-Day Response to NOV and Title V Report was previously submitted to the District on July 1, 2025 via email by Site Manager, Kevin Iler, **Attachment B**. This letter also satisfies the regulatory requirements for the 30-Day Title V Report required by Title V Permit Condition Section I.F (Monitoring Reports).

NOV NUMBER A63615

Per NOV Number A63615, alleged violations of District Regulation 8, Rule 34, Section 303 (Landfill Surface Requirements) occurred during a regulatory inspection conducted on June 23 and 24, 2025. The District identified two (2) alleged surface leaks of methane above the 500 parts per million by volume (ppmv) limit during the inspection.

District personnel provided additional details, including monitoring locations and surface emission data, on the exceedances along with the NOV on June 26, 2025. Therefore, this submittal references the exceedances noted by the District as well as includes the field notes provided by the facility's third-party Operations and Maintenance (O&M) personnel, who accompanied the District along with PHLF personnel during the inspection

CORRECTIVE ACTION TO PREVENT REOCCURRENCE

Corrective actions were initiated at the locations identified by the District and recorded by the site's third-party O&M provider, SCS Field Services (SCSFS). These corrective actions included well field adjustments, replacement of the bentonite seals, the addition of clean cover material, compaction, and hydration. Additional details of corrective actions and preventative measures can be found in **Attachment C**. Remediation efforts were completed on June 24, 2025. Subsequent re-monitoring events were completed on June 24, and July 21, 2025, within the required 10 and 30-day timeframes. The re-monitoring results indicated all locations had returned below the 500 ppmv limit.



The areas of alleged exceedance were addressed immediately upon detection by the District. Corrective actions and re-monitoring events were completed within the required timeframes and the results indicated the alleged exceedances had been successfully remediated and returned below the 500 ppmv, within the parameters of District Rule 8-34-303 and 415 (Repair Schedule for Landfill Surface Leak Excesses).

CONCLUSION

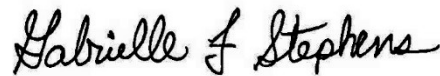
PHLF is vigilant about ensuring the gas collection and control system (GCCS) at PHLF is operated in compliance with all applicable regulations and permit conditions. SCSFS continues to collect gas samples and make well adjustments to increase landfill gas (LFG) extraction and reduce surface emissions. All areas of alleged exceedances were corrected within the required timeframes.

If you have any questions, please do not hesitate to contact the undersigned Hannah Morse at (562) 305-0364 or HMorse@scsengineers or Gabrielle Stephens at (562) 355-6510 or GStephens@scsengineers.com.

Sincerely,



Hannah Morse
Staff Scientist
SCS ENGINEERS



Gabrielle Stephens
Project Director/Vice President
SCS ENGINEERS

Cc: Lily Law, BAAQMD
Kevin Iler, Potrero Hills Landfill, Inc.
Natalie Hicks, Potrero Hills Landfill, Inc.
Curt Fujii, Potrero Hills Landfill, Inc.
Art Jones, SCS Field Services

Attachment A: NOV A63615



BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT

BAY AREA AIR QUALITY MANAGEMENT DISTRICT
375 Beale Street, Suite 600, San Francisco, CA 94105
(415) 749-5000

NOTICE OF VIOLATION

No. **A63615**

ISSUED TO: Potrero Hills Landfill, Inc P G N# 2039
 ADDRESS: PO BOX 68
 CITY: Fairfield STATE: CA ZIP: 94533
 PHONE: (707) 330-3876
 N# Mailing Address on F61

OCCURRENCE
 NAME: Potrero Hills Landfill, Inc
 ADDRESS: 3675 Potrero Hills Lane Same As Above
 CITY: Suisun City ZIP: 94585
 SOURCE: S# 1 NAME: Potrero Hills MSW Landfill - Waste Decomposition Process
 EMISSION PT: P# _____ NAME: _____
 DATE: 6/23/2025 TIME: 1416 HRS

<input type="checkbox"/> REG 2 RULE 1 SEC 301 No Authority to Construct	<input type="checkbox"/> REG 2 RULE 1 SEC 302 No Permit to Operate
<input type="checkbox"/> REG 1 SEC 301 H & S CODE - 41700 Public Nuisance	<input type="checkbox"/> REG 2 RULE _____ SEC 307 Failure to Meet Permit Condition
<input type="checkbox"/> REG 5 SEC 301 Prohibited Open Burning	<input type="checkbox"/> REG 6 RULE 1 SEC 301 Excessive Visible Emissions
<input checked="" type="checkbox"/> REG <u>8</u> RULE <u>34</u> SECTION <u>303</u> CODE <input type="text"/>	
<input type="checkbox"/> REG _____ RULE _____ SECTION _____ CODE _____	<input type="text"/>

Details: Surface Leaks exceedances above 500 ppm found

RECIPIENT NAME: Kevin Iler
 TITLE: Site Manager
 SIGNING THIS NOTICE IS NOT AN ADMISSION OF GUILT Kevin Iler

➔ WITHIN 10 DAYS, RETURN A COPY OF THIS NOTICE WITH A WRITTEN DESCRIPTION OF THE IMMEDIATE CORRECTIVE ACTION YOU HAVE TAKEN TO PREVENT CONTINUED OR RECURRENT VIOLATION. **THIS VIOLATION IS SUBJECT TO SUBSTANTIAL PENALTY.** YOUR RESPONSE DOES NOT PRECLUDE FURTHER LEGAL ACTION.

ISSUED BY: Lily Law INSP # 919
 DATE: 6/26/2025 TIME: 1525 HRS MAILED

PLEASE PRESS HARD

Sent Via E-mail

Continued On Reverse

Attachment B: 10-Day Response to NOV A63615

- Outlook

FW: Bay Area Air District: FID 2039 - Notice of Violation A63615

This email originated from outside of SGS Engineers. Do not click links or open attachments unless you recognize the sender and know the content is safe.

From: Kevin Iler

Sent: Tuesday, July 1, 2025 4:36 PM

To: Lily Law <lilaw@baaqmd.gov>; Natalie Hicks <Natalie.Hicks@WasteConnections.com>

Cc: Leo Castellblanch <lcastellblanch@baaqmd.gov>; Raymond Salalila <RSalalila@baaqmd.gov>; Gabriel Quevedo <gquevedo@baaqmd.gov>; Christopher Coelho <ccoelho@baaqmd.gov>

Subject: RE: Bay Area Air District: FID 2039 - Notice of Violation A63615

Good afternoon, Lily,

I am returning the signed NOV for your records.

We remediated the surface leaks on the afternoon of June 24, 2025 and SCS monitored the locations upon completion of the remediation work. Both locations were observed to have returned to below compliance limits.

- Issue #1 (West of EW20-10 S/D) = 20.5 ppm
- Issue #2 (West of EW14-05) = 2.9 ppm

Please feel free to reach out to me with any questions.

Thanks,

Kevin Iler
Site Manager
Potrero Hills Landfill
Cell: (707) 330-3876


From: Lily Law <llaw@baagmd.gov>
Sent: Thursday, June 26, 2025 3:30 PM
To: Kevin Iler <kevin.iler@wasteconnections.com>; Natalie Hicks <Natalie.Hicks@WasteConnections.com>
Cc: Leo Castellblanch <lcastellblanch@baagmd.gov>; Raymond Salalila <RSalalila@baagmd.gov>; Gabriel Quevedo <gguevedo@baagmd.gov>; Christopher Coelho <ccoelho@baagmd.gov>
Subject: Bay Area Air District: FID 2039 - Notice of Violation A63615
Importance: High

Good afternoon,

Notice of Violation (NOV) A63615 is being issued for surface leaks exceeding 500 ppm found in S1 Potrero Hills MSW Landfill - Waste Decomposition Process during the compliance verification inspection on 6/23/2025 and 6/24/2025. This is a Violation of Air District Regulation 8, Rule 34, Section 303.

Please sign and return the electronic NOV. The NOV can be signed using one of the following methods:

- 1) Use Acrobat Reader to electronically sign the PDF document:
 - a. Use Acrobat Reader Fill & Sign.
 - b. Send the signed PDF copy of the NOV back to me via email.
- 2) Manually sign the NOV:
 - a. Print the NOV attached to the email.
 - b. Sign on the signature line.
 - c. Scan the document.
 - d. Send the signed PDF copy of the NOV back to me via email.

 WITHIN 10 DAYS, RETURN A COPY OF THIS NOTICE WITH A WRITTEN DESCRIPTION OF THE IMMEDIATE CORRECTIVE ACTION YOU HAVE TAKEN TO PREVENT CONTINUED OR RECURRENT VIOLATION. THIS VIOLATION IS SUBJECT TO SUBSTANTIAL PENALTY, YOUR RESPONSE DOES NOT PRECLUDE FURTHER LEGAL ACTION.

Please see the surface leaks details below. Feel free to reach out if you need any additional information regarding the surface leaks locations.

Issue#	Wellhead ID	Surface - ppm
1	West of EW20-10 S/D	4000
2	West of EW14-05	1400

Thank you,

Lily Law
 Air Quality Specialist
 Compliance and Enforcement Division
 375 Beale Street, Suite 600, San Francisco, CA 94105
llaw@baagmd.gov
 Office: 415-749-51721 Cell: 628-218-1157

Attachment C: Corrective Action and Preventative Measures

July 22, 2025
Project No. 07216067.00

Mr. Kevin Iler
Waste Connections
Potrero Hill Landfill
P.O. Box 68
Fairfield, California 94533

Subject: Potrero Hills Landfill – Suisun City, California
BAAD (Bay Area Air District) Regulatory Inspection-June 2025 Results.

Dear Mr. Iler:

SCS Field Services (SCS-FS) is pleased to provide Waste Connections (WCI), with the enclosed report summarizing the BAAD Regulatory Inspection Results at the Potrero Hills Landfill (Site), on June 23, and 24, and July 21, 2025. This report includes the results of the surface scan, component emissions, and blower/flare station emissions monitoring for the Site.

During the BAAD inspection on June 23, and 24, 2025, there were two instantaneous surface locations identified by the BAAD to have observed concentrations greater than the regulatory threshold of 500 ppm for surface emissions, per the Landfill Methane Rule (LMR), Rule 8-34 and the New Source Performance Standard (NSPS). Following the inspection on June 24, 2025, SCS assisted WCI with performing repairs to the locations, which included, well field adjustments, replacement of the bentonite seals, the addition of clean cover material, compaction, and hydration. Following these repairs, SCS performed the first 10-day and 30-day follow up monitoring on June 24, and July 21, 2025, in accordance with the regulations. Both locations were observed to have returned to, and remained below compliance limits. Please see the attached figure and the below table for concentrations and locations.

Location	Initial (ppm)	First 10-Day (ppm)	Second 10-Day (ppm)	30-Day (ppm)	Lat	Long
	23-Jun	24-Jun	NA	21-Jul		
HSR1	1,400	2.9	--	3.8	38.21125899	-121.98080898
HSR2	4,000	20.5	--	14.8	38.21128900	-121.98026299

Mr. Kevin Iler
July 22, 2025
Page 2

SCS-FS appreciates the opportunity to be of assistance to WCI on this project. As you review the enclosed information, please contact Art Jones at (209) 345-2062, Mike Calmes at (209) 961-0001, or Whitney Stackhouse at (209) 338-7990 if you have any questions or comments.

Sincerely,



Whitney M. Stackhouse
Project Manager
SCS Field Services

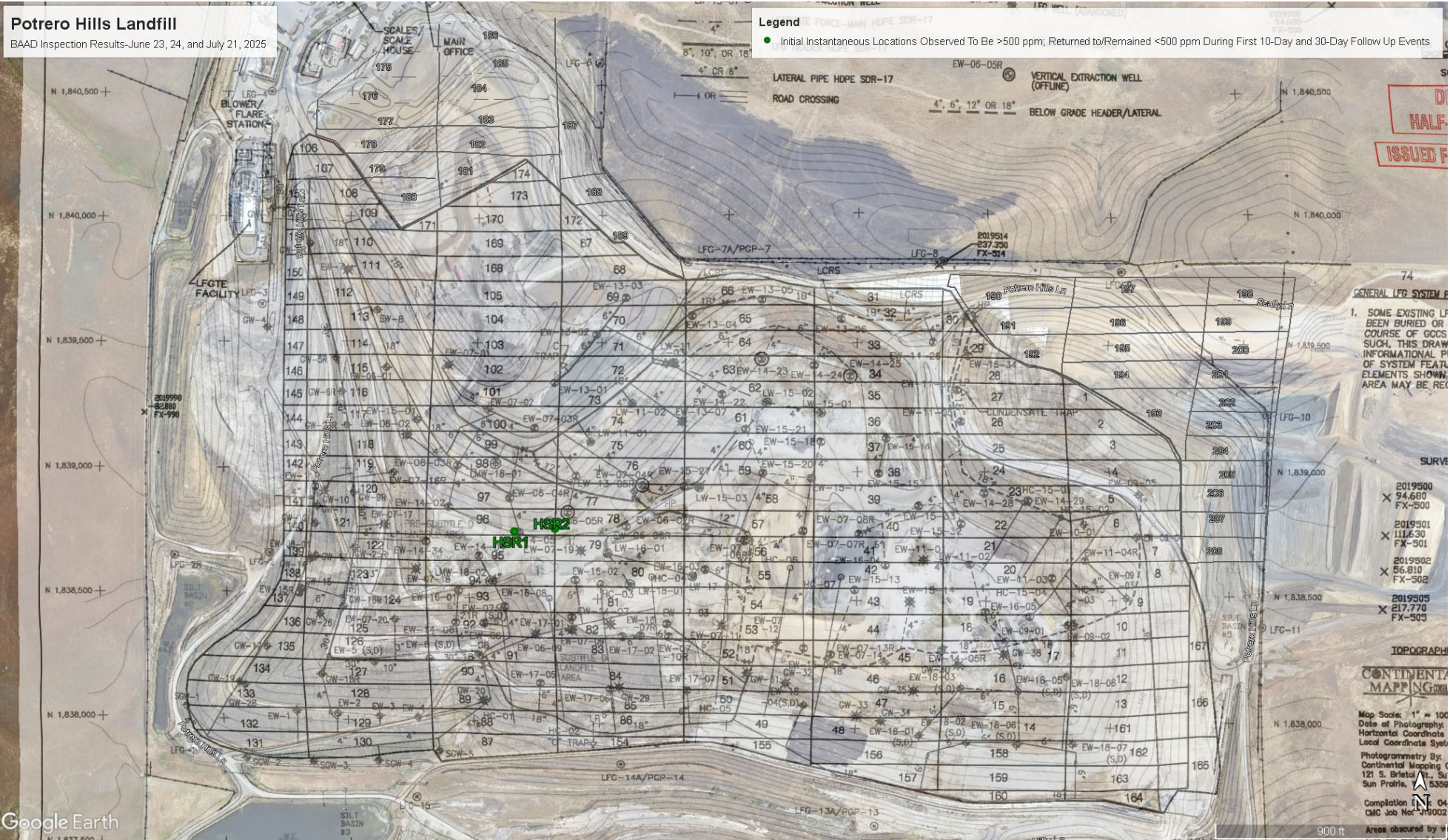


Arthur E. Jones Jr.
DSW Region Manager/VP
SCS Field Services

WS/AJ

cc: Enclosure

Mike Calmes - SCS Field Services
Gabrielle Stephens - SCS Engineers
Hannah Morse - SCS Engineers



June 23, 24, and July 21, 2025

**Observed Instantaneous Locations Above 500 ppmv During BAAD Inspection
Potrero Hills Landfill, Suisun City, California**



SURFACE EMISSIONS MONITORING CALIBRATION AND PERTINENT DATA

Date: 2025-06-24 Site Name: Potrero Hills Landfill

Inspector(s): Emmanuel Paz

Instrument: TVA 2020 Serial Number: 5421

WEATHER OBSERVATIONS

Wind Speed: 13 MPH Wind Direction: NE Barometric Pressure: 29.94 "Hg

Air Temperature: 60 F General Weather Conditions: Clear

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precision must be less than or equal to 10% of the calibration gas value.

Instrument Serial Number: _____ Cal Gas Concentration: _____ 500ppm

Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc.-Cal Gas Reading	Response Time (seconds)
1	4313	125116	-124616	6
2	4260	123933	-123433	7
3	4333	124562	-124062	7

Average Difference: -124037

*perform recalibration if average difference is greater than 10

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

$$= 100\% - \frac{-124037}{500} \times 100\%$$

$$= \underline{24907.4\%}$$

Span Sensitivity:

<p>Trial 1:</p> <p>Counts Observed for the Span= <u>502</u></p> <p>Counters Observed for the Zero= <u>0</u></p>	<p>Trial 3:</p> <p>Counts Observed for the Span= <u>500</u></p> <p>Counters Observed for the Zero= <u>0</u></p>
<p>Trial 2:</p> <p>Counts Observed for the Span= <u>501</u></p> <p>Counters Observed for the Zero= <u>-0.1</u></p>	

Post Monitoring Calibration Check

Zero Air Reading: -0.8 ppm Cal Gas Reading: 496 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Flare Reading: 6.9 ppm

Downwind Location Description: Entrance Reading: 7.8 ppm

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

