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 Sonoma Central. The report contains monitoring data for the operation of the landfill gas (LFG) collection and control system (GCCS). The operational records have been reviewed and summarized. The timeframe included in this report is August 1, 2018 through January 31, 2019. 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, 8-34-501.11, 8-34-509, §60.757(f)(2),(3)	All emission control system downtime and the reason for the shutdown.	Section 2.2, Appendix D, E & F
8-34-501.3, 8-34-507, & §60.757(f)(1)	Continuous temperature for all operating flares and any enclosed combustor subject to Section 8-34-507.	Section 2.3, Appendix G
8-34-501.4, 8-34-505, & 8-34-510	Monitoring and Testing performed to satisfy any of the requirements of this rule.	Sections 2.6 & 2.12
8-34-501.5	Monthly landfill gas flow (LFG) rates and well concentration readings for facilities subject to 8-34-404.	Section 2.5, 2.13 Appendix N
8-34-501.6, 8-34-503, 8-34-505, 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, Appendix I & J
8-34-501.7	Annual waste acceptance rate and current amount of waste in-place.	Section 2.10 & Appendix L
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 2.11
8-34-501.9, 8-34-305, 8-34-505, §60.755(a)(5) §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 2.12, Appendices M & N

Rule	Requirement	Location in Report
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 2.13, Appendix O
8-34-501.11, 8-34-509	For operations subject to Section 8-34-509, records or key emission control system operating parameters.	Section 2.2.2
8-34-501.12	The records required above shall be made available and retained for a period of 5 years.	Section 1.2
§60.757(f)(2)	Description and duration of all periods when the gas stream is diverted from the control device through a bypass line or the indication of bypass flow as specified under §60.756.	Section 2.2.1
§60.757(f)(6)	The date of installation and the location of each well or collection system expansion added pursuant to paragraphs (a)(3), (b), (c)(4) of §60.755.	Section 2.1.2, Appendices A & C
§60.10 (d)(5)(i)	Startup, Shutdown, Malfunction Events	Section 4.0, Appendices C, D, E & F

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

Appendix A contains a current map of Sonoma Central's existing GCCS. Section 2.1.1 includes the GCCS downtime for the reporting period. The information contained in Section 2.1.2 includes wellfield SSM event information. Refer to Appendix C for the GCCS 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 August 1, 2018 through January 31, 2019 was 1.03 hours. The total downtime for the 2018 calendar year (January – December) is 35.13 hours, out of an allowable 240 hours per year. Appendix C contains the GCCS Downtime, Appendix E contains the A-4 Flare SSM Logs, and Appendix F contains the internal combustion (IC) Engine SSM Logs for the reporting period.

2.1.2 Well Start-Up, Shutdown, and Malfunction Log

There were 62 wellfield SSM events during the reporting period, which included 12 well start-ups, 16 wells decommissioned, and 1 well remains temporarily offline due to wellhead repairs during the reporting period. Refer to Appendix D, Wellfield SSM Log, for further details.

2.2 Emission Control Device Downtime (BAAQMD 8-34-501.2 & §60.757(f)(2),(3))

The emission control system consists of one LFG-to-energy (LFGTE) facility, ten IC engines (S-4, S-5, S-6, S-7, S-9, S-10, S-11, S-12, S-13, and S-14) and an enclosed backup flare, the A-4 Flare was installed on December 12, 2017 and replaced the A-3 Flare. The A-4 Flare is now the primary flare to the engines at the landfill. Engine No. 10 (S-14) is on long-term standby pursuant to BAAQMD Application No. 22513.

Raw LFG was not emitted during the reporting period.

The SSM Logs for the A-4 Flare and the IC Engines are in Appendices E and F, respectively.

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

Title 40 CFR §60.757(f)(2) is not applicable at Sonoma Central 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)

The IC engines (S-4, S-5, S-6, S-7, S-9, S-10, S-11, S-12, S-13, and S-14) are subject to key emission control system operating parameters. Pursuant to Permit to Operate (PTO) Condition 19933 Part 11 issued May 4, 2016 (valid for the reporting period through June 1, 2018), Sonoma Central must operate each IC Engine at the fuel-to-air ratio established during the most recent compliance source test. In addition, the exhaust oxygen concentration for each engine must be maintained within a range of 6.4 to 8.3 percent as established by Permit Application Number (A/N) 9277. To demonstrate compliance with this requirement, the exhaust gas oxygen concentration for each engine is to be measured and recorded in a District approved log on at least a monthly basis which was done for all engines (S-4, S-5, S-6, S-7, S-9, S-10, S-11, S-12, and S-13). IC Engine S-14 was in long-term standby mode during the reporting period and did not operate.

On July 1, 2018, the BAAQMD issued the new annual PTO applicable for the reporting period of June 1, 2018 through July 1, 2019. Per the new PTO, Condition 19933 Part 11 has been removed and is no longer applicable. However, since it remains part of the Title V permit, Sonoma Central will continue reporting to comply with the Title V permit until such time that it is removed from the new, pending Title V permit.

Exhaust oxygen concentrations for all IC Engines that operated were in compliance with PTO Condition No. 19933 Part 11 during the applicable reporting period. The Monthly Exhaust Oxygen Content Log is included in Appendix Q.

Per A/N 28326 Condition 26507 Parts 1 and 2, the owner/operator shall ensure that carbon monoxide (CO) emissions from each LFG fired combustion device (flares and engines) located at Sonoma do not exceed the emission rate identified and the site-wide CO emissions will not exceed 225.0 tons, during any consecutive rolling 12-month period. Each CO limit in this part is derived from, but does not replace, source-specific emissions related limitations that may be contained in other permit conditions for these devices. Estimated CO concentrations were calculated for the reporting period and no exceedances of either the source limitation nor site-wide limitation occurred. CO concentrations for all devices are contained in Appendix R.

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

The A-4 Flare combustion zone temperatures while the flare was in operation must not drop below 1,400 degrees Fahrenheit (°F) or 50°F below the average combustion temperature during the most recent source tests. Compliance with temperature limitations is determined based on the 3-hour rolling average temperature.

The combustion zone temperature of the A-4 Flare was continuously monitored during operation. The temperature is recorded by a Yokogawa data system. There were no temperature deviations recorded during the reporting period. Appendix G contains the A-4 Flare Temperature Deviation/Inoperative Monitor/Missing Data Reports for August 1, 2018 through January 31, 2019.

2.4 Monthly Cover Integrity Monitoring (BAAQMD 8-34-510)

The Cover Integrity Monitoring was performed monthly during the reporting period on the following dates:

- August 3, 2018;
- September 10, 2018;
- October 29, 2018;
- November 6, 2018;
- December 18, 2018; and
- January 21, 2019.

The Monthly Cover Integrity Monitoring reports are included in Appendix H.

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

Sonoma Central does not operate under BAAQMD Regulation 8-34-404 (Less Than Continuous Operation) and is therefore 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 Air Resources Board Assembly Bill 32 Methane Control Measure (CARB AB-32 LF MCM))

Quarterly Surface Emissions Monitoring (SEM) was conducted for Third and Fourth Quarter 2018 on the following dates:

- Second Quarter 2018 – June 6, 7, 14, 22, and 28, 2018;
- Third Quarter 2018 – September 17, 18, 26, and October 4 and 10, 2018; and
- Fourth Quarter 2018 – December 6, 17, 26, 2018, and January 4, 2019.

Refer to Appendix I for detailed results of the Second, Third and Fourth Quarter SEMs.

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

Quarterly component leak testing, pursuant to BAAQMD Regulation 8-34-503, was conducted during the reporting period on the following dates:

- Fourth Quarter 2018 – December 14, 2018; and
- First Quarter 2018 – January 10, 2019.

No leaks were detected during the quarterly monitoring events. Refer to Appendix J, Quarterly LFG Component Leak Monitoring Forms, for detailed results for the quarterly monitoring events.

2.8 Sulfur Monitoring Records (BAAQMD Condition #4044 Part 7 & 18)

Pursuant to PTO Condition 4044 Part 7 issued July 1, 2017, the concentration of total reduced sulfur compounds in the LFG has been revised to comply with BAAQMD Regulation 9-1-302 and must not exceed 300 ppmv (dry). The concentration of total reduced sulfur compounds in the LFG did not exceed 300 ppmv for the applicable reporting period.

Refer to Appendix K for additional details.

2.9 Dust Suppression Records (BAAQMD Condition #4044, Part 19)

Republic confirms that water was used as a dust suppressant pursuant to Permit Condition 4044 Part 19. Records are available upon request.

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

During the reporting period, Sonoma Central did not exceed the waste acceptance limits for the total maximum landfill capacity of 19.59 million tons, the daily waste acceptance of 2,500 tons per day (tpd), or the annual waste acceptance of 897,500 tons per year (tpy), in accordance with Condition 4044 Part 1.

On November 7, 2017, the LEA granted the Emergency Waiver to increase the hours of operation, suspend the tonnage requirements, and approve additional transfer/processing sites upon identification for the duration of the emergency. This waiver expired March 1, 2018 but was in effect for February 2018 during this semi-annual reporting period.

The total waste accepted during the reporting period was 220,490 tons. As of January 31, 2019, the total waste in place (WIP) is 16,659,221 tons. Daily waste tonnage acceptance records are available upon request at the site. A monthly waste tonnage acceptance record summary is provided in Appendix L.

2.10.1 Low-Volatile Organic Compounds (VOC) Content Soil Acceptance (BAAQMD Condition #4044, Part 20)

Republic confirms that no VOC contaminated (greater than 50 ppmv) soil was accepted during the reporting period.

2.11 Non-degradable Waste Acceptance Records (BAAQMD 8-34-501.8)

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

2.12 Wellhead Monitoring Data (BAAQMD 8-34-305.1, 8-34-305.2, 8-34-305.4, §60.755(a)(5), §60.757(f)(1))

Wellhead monitoring was performed on a monthly basis pursuant to 8-34-505. The well readings for August 1, 2018 through January 31, 2019 are included in Appendix M. Each well was monitored in accordance with the following requirements:

- 8-34-305.1 – Each wellhead shall operate under a vacuum;
- 8-34-305.2 – The LFG temperature in each wellhead shall be less than 55 degrees Celsius (°C) (131 degrees Fahrenheit [°F]); and
- 8-34-305.4, §60.755(a)(5), §60.756(a)(2) – The oxygen concentration in each wellhead shall be less than five percent by volume.

Wellhead monitoring was performed on the following dates:

- August 3, 8, 9, 10, 13, 14, 21, 24, 27, and 31, 2018;
- September 5, 12, 14, 19, 24, 26, 27, 28, and 29, 2018;
- October 3, 10, 12, 13, 15, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, and 30, 2018;
- November 6, 19, 27, 28, 29, and 30, 2018;
- December 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 24, 26, and 31, 2018; and
- January 2, 3, 4, 7, 8, 9, 17, 18, 19, 22, 23, 24, 25, and 28, 2019.

2.12.1 Wellhead Exceedances (BAAQMD 8-34-501.9 & §60.757(f)(1))

There were 77 wells with readings that exceeded the limits set forth in BAAQMD Regulation 8-34-305 during the reporting period. Corrective action for the wells was initiated within the required five-day time period and in general re-monitoring was completed within 15 days of the deviation pursuant to BAAQMD Regulation 8-34-414. However, it should be noted that during the reporting period, six wells were not re-monitored within the 15-day requirement. Additionally, two wells appear to have missed the initial five-day re-monitoring; however, since the exceedance detected was a result of a second follow-up reading for the well the same day, the operations and maintenance (O&M) provider treated these two wells as ongoing exceedances for the purposes of tracking. See Appendix N, Wellfield Deviation Log, for further details.

2.12.1.1 Higher Operating Values (HOV) Wells

Republic requested an exemption from BAAQMD Rule 8-34 wellhead standards and alternate wellhead monitoring limits for 11 extraction wells. The BAAQMD approved the alternate wellhead monitoring limits for these extraction wells in Authority to Construct (ATC) No. 16582 issued December 19, 2014. Permit Condition 4044 Part 5b was added to the PTO allowing up to 15 percent oxygen in gas extraction V-058, V-061, V-062, V-117, EC-9.1, EC-15, EC-19, EC-24, EC-25, EC-26, and EC-26.1. All the wells originally approved have been decommissioned except EC-15 and EC-19.

On December 13, 2017, Sonoma Central Landfill applied for a HOV for temperature for six

vertical wells in the Landfill I area. Sonoma received approval of the HOV for temperatures up to 145°F (Permit Condition 4044 Part 5bi) for SCV107-0, SCV109-0, SCV112-0, SCV113-0, SCV114-0, and SCV115-0 as of the issuance of the site's PTO on/dated May 1, 2018. Pursuant to Condition 4044 Part 5c, these wells must not exceed 500 ppmv for carbon monoxide (CO). Additionally, per Permit Condition 4044, Part 5c.v.2. the wells must be investigated once the well exceeds 140°F to ensure there is no risk for subsurface fire. For instances when CO ranges between 100 - 499 ppmv of carbon monoxide, the well must be monitored twice monthly until the CO levels. None of these temperature HOV wells exceeded 140°F during the reporting period.

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

The A-3 Flare was decommissioned on November 7, 2017 and removed from site in December 2017.

The A-4 Flare was installed and began initial operation on December 12, 2017 and is operated in accordance with the limitations established for the A-3 Flare. The A-4 Flare LFG flow rate is measured and recorded when the flare is in operation. 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 meter sends a signal to a Yokogawa digital recorder. The A-4 Flare operated for 2,163.61 hours during the reporting period as a backup to the IC Engines.

The IC Engine LFG flow is recorded on a Digital Chart Recorder. The Yokogawa data recorder records LFG flow every 120 seconds and data is downloaded and saved to a compact flash card. The 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.

During the reporting period, the A-4 Flare remained in compliance and did not exceed the annual heat input limit set by permit conditions. In accordance with Permit Condition 4044, Part 13, the heat input to the Flare did not exceed 547,680 million British thermal units (MMBtu) per year during the reporting period.

During the reporting period none of the IC engines exceeded the daily or annual heat input limits. Pursuant to Permit Condition 19933 Part 10, the heat input to each IC engine shall not exceed 252.6 MMBtu/day, or 92,199 MMBtu/year, and is summarized monthly. Phase I, Phase II, and Phase III LFG daily flow records are divided by the number of engines that operated to calculate heat input per engine per day (MMBtu/unit).

Summaries of the monthly LFG flow rates and heat input totals for the IC Engines and the A-4 Flare are included in Appendix O.

2.14 Compliance with §60.757(f)(6)

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

There were 62 wellfield SSM events during the reporting period, which included 12 well start-ups, 16 wells decommissioned, and 1 well remains temporarily offline due to landfill construction and GCCS improvements during the reporting period. Refer to Appendix D, Wellfield SSM Log, for further details.

2.15 Volume of Landfill Gas Converted in S-15

The LFG compression plant (S-15) is a pilot scale unit designed to operate as a closed loop system with all waste gases vented to either the flare or IC engines pursuant to Permit Condition 23087. The unit was completed in February 2009. Compressed natural gas (CNG) produced at Sonoma Central has historically been used to fuel select vehicles in the Sonoma Central Transit bus fleet. The plant has been shut down since October 2013 and therefore did not operate during the reporting period.

3 PERFORMANCE TEST REPORT

In accordance with BAAQMD Regulation 8-34-413, 40 CFR §60.757(g), and 17 CCR 95464(b)(4), a Performance (Source) Test Report is required to be submitted from facilities containing performance and monitoring data for the operation of the GCCS. The following table lists the rules and regulations that are included in this Combined Report.

TABLE 3-1 – PERFORMANCE TEST REQUIREMENTS

Rule	Requirement	Location in Report
8-34-412, §60.8, §60.752(b)(2)(iii)(B), §60.754(d)	Compliance Demonstration Test	Section 3.1
§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 P

3.1 Compliance Demonstration Test Results (BAAQMD 8-34-412)

The Compliance Demonstration (Source) Test were performed as follows by Blue Sky Environmental, Inc. (Blue Sky) pursuant to BAAQMD Regulation 8-34-412 and CARB 17 CCR 95464(b)(4):

- IC Engines S-11 and S-12 (Engine Nos. 7 & 8) were tested on January 23, 2018;
- A-4 Flare was tested on January 29, 2018; and
- IC Engine S-13 was tested on February 20, 2018.

(The Compliance Demonstration (Source) Tests listed above were included in the previous Semi-Annual Report submitted in August 2018.)

- IC Engine S-9 (No. 5) was tested on August 14, 2018 by the BAAQMD.

The annual source tests for the remaining IC Engines have not been completed, as the engines have been offline for repairs during scheduled testing periods. The source test results for IC Engine S-9 is included in this SAR in Appendix S.

3.1.1 A-4 Flare Source Test Results (BAAQMD 8-34-412)

The results of the source test for the A-4 Flare from January 29, 2018, indicate that the A-4 Flare is in compliance with BAAQMD Regulation 8-34-301.3 and California Air Resources Board (CARB) 17 CCR §95464(b)(2)(A) requirements. This source test also satisfies the requirements of BAAQMD Regulation 8-34-412. As required by BAAQMD Regulation 8-34-301.3, the A-4 Flare meets a non-methane organic compound (NMOC) emission rate of less than 30 ppmv or exceeded the minimum destruction efficiency of NMOC of 98 percent. The results of the A-4 Flare source test were included in the previous Semi-Annual Report submitted in August 2018 in Appendix S.

As required by CARB 17 CCR §95464(b)(2)(A)(1), the A-4 Flare meets the methane destruction efficiency of at least 99 percent. A copy of the results were submitted in the previous Semi-Annual Report submitted in August 2018 in Appendix S.

3.1.2 IC Engines Source Test Results

Source test results for IC Engine S-9 is included in Appendix S of this report. Source test for the remaining engines were not available at the time of this report and will be included in the next Semi-Annual Report due August 30, 2019.

3.1.3 Quarterly Demonstration of Compliance

In accordance with BAAQMD Regulation 9, Rule 8-503, a portable analyzer was used to take NO_x and CO emission readings to verify compliance with applicable emission limits during each calendar quarter in which a source test was not performed.

Quarterly NO_x and CO emission results of the portable analyzer readings were provided by Republic and are summarized in Appendix R.

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 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 SEM results and monthly wellhead readings). New emission control devices will be designed and permitted as appropriate for future 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."

There are no segregated areas or accumulations of asbestos material onsite. 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 no 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."

Sonoma Central began construction on April 1, 2018 for a new cell and associated GCCS piping. The work was completed by August 30, 2018. With this new construction, the existing GCCS conveyance piping and emission control devices continue to have sufficient capacity to handle current and future LFG flow rates. New emission control devices have been designed and permitted as appropriate for 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, is conducted based on a report schedule beginning in February and finishing in January of the following year (First Quarter is November - January, Second Quarter is February - April, Third Quarter is May - July, and Fourth Quarter is August - October).

Quarterly LFG migration monitoring conducted during this reporting period occurred on the following dates:

- Fourth Quarter 2018 – October 3, 2018; and
- First Quarter 2019 – December 14, 2018 and January 10, 2019.

There were no exceedances detected during either event. The LFG Probe and In-Structure Monitoring Reports for Fourth Quarter 2018 is included in Appendix P. The First Quarter 2019 report was unavailable at the time of this report submission and will be included in the next Semi-Annual Report due August 30, 2019.

The Landfill operator will continue perimeter probe and structure 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 START-UP, SHUTDOWN, MALFUNCTION REPORT

4.1 SSM Log for the GCCS at Sonoma Central

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 (August 1, 2018 through January 31, 2019). The following information is included as required:

- During the reporting period, 39 A-4 Flare SSM events occurred. The A-4 Flare was shut down during the reporting period due to the reasons noted in Appendix E, Flare SSM Log.
- During the reporting period, 333 SSM events occurred at the nine IC Engines (S-4, S-5, S-6, S-7, S-9, S-10, S-11, S-12 and S-13). IC Engine S-14 did not operate for the duration of the reporting period. The IC Engines were shut down and restarted during the reporting period due to the reasons noted in Appendix F, IC Engine SSM Log.
- During the reporting period, 62 Wellfield SSM events occurred. Details are included in Appendix D, Wellfield SSM Log.
- There were 434 events in total. In all 434 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)).

I certify the following:

Based on information and belief formed after reasonable inquiry, information on the startup, shutdown, malfunction forms, all accompanying reports, and other required certifications are true, accurate, and complete.

Rob Sherman

Signature of Responsible Official

02/27/2019

Date

Rob Sherman

Name of Responsible Official