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ENFORCEMENT: 03/31/2026

KELLER CANYON LANDIFLL

TITLE V SEMI-ANNUAL MONITORING REPORT

SITE:	KELLER CANYON LANDFILL	FACILITY ID#:	A4618
REPORTING PERIOD:	from	through	
	09/01/2025	02/28/2026	

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:

Sean Deloquin

03/30/2026

Signature of Responsible Official

Date

Sean Deloquin

Name of Responsible Official (please print)

General Manager

Title of Responsible Official (please print)

Mail to:

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

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REPORTING PERIOD: <i>from</i> 09/01/2025 <i>through</i> 02/28/2026	

List of Permitted Sources and Abatement Device

Permit Unit Number	Equipment Description
S-#	Description
S-1	Keller Canyon Landfill – Waste Decomposition Process; Abated by A-1 Landfill Gas Flare, and A-2 Landfill Gas Flare
S-4	Keller Canyon Landfill – Waste and Cover Material Dumping
S-5	Keller Canyon Landfill – Excavating, Bulldozing and Compacting Activities
S-3	Yard and Green Waste Stockpiles

Notes:

On February 22, 2024, the District reissued ATC #28642 for the A-3 Flare, as the PTO is still being processed. The new expiration date for ATC #28642 was October 20, 2025. As ATC #28642 expired and a PTO has still not been issued, an application for ATC Renewal was submitted at the end of 2025.

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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	Bay Area Air District or District 8-34-501.7 and 501.8 and District Condition # 17309, Part 16d-h	Records	Periodic / On event basis	District 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	District 8-34-501.7 and 501.8 and District Condition # 17309, Part 16d-h	Records	Periodic / On event basis	District 8-34-304.2 and District Condition # 17309, Part 18b	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	District 8-34-501.7 and 501.8 and District Condition # 17309, Part 16d-h	Records	Periodic / On event basis	District 8-34-304.3 and District Condition # 17309, Part 18b	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
Collection System Installation Dates	40 CFR 60.758(a), (d)(1) and (d)(2), and 60.759(a)(3)	Records	Periodic / On event basis	40 CFR 60.753 (a)(2) and 60.755 (b)(2)	For Inactive/Closed Areas: collection system components must be installed and	Continuous	N/A

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					operating by 2 years + 60 days after initial waste placement		
Collection System Installation Dates	40 CFR 60.758(a), (d)(1) and (d)(2)	Records	Periodic / On event basis	40 CFR 60.753 (a)(1) and 60.755 (b)(1)	For Active Areas: Collection system components must be installed and operating by 5 years + 60 days after initial waste placement	Continuous	N/A
Gas Flow	District 8-34-501.10 and 508 and District Condition # 17309, Parts 27 and 28	Gas Flow Meter and Recorder (every 15 minutes)	Continuous	District 8-34-301 and 301.1 and District Condition # 17309, Parts 19, 20, 21	Landfill gas collection system shall operate continuously, all collected gases shall be vented to a properly	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
					operating control system, and control system shall operate continuously		
Gas Flow	40 CFR 60.756(b)(2) (i or ii) and 60.758(c)(2)	Gas Flow Meter and Recorder (every 15 minutes) or Monthly Inspection of Bypass Valve and Lock and Records	Continuous, Periodic / Monthly	40 CFR 60.752 (b)(2)(iii) and 40 CFR 60.753(a) and (e)	Operate a collection system in each area or cell, vent all collected gases to a properly operating control system, and operate control system at all times when gas is vented to it	Continuous	N/A
Gas Flow	CARB LMR 95469(b)(1)(B)	Gas Flow Meter and Recorder (every 15 minutes)	Continuous	CARB LMR 95464(b)(1)	Route all collected gases 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
					and operate control system at all times so that no gas leak exceed 500 ppmv as methane		
Collection and Control Systems Shutdown Time	District 8-34-501.1 and 501.2	Operating Records (all occurrences and duration of each)	Periodic / Daily	District 8-34-113.2	For Collection and Control Systems: ≤ 240 hours per year and ≤ 5 consecutive days	Continuous	N/A
Collection and Control Systems Startup Shutdown or Malfunction	40 CFR 60.7(b), 60.757(f)(2-4)	Operating Records (all occurrences and duration of each)	Periodic / Daily	40 CFR 60.755(e)	For Collection System: < 5 days per event and For Control System: < 1 hour per event	Continuous	N/A
Collection and Control	CARB LMR 95470(a)(1)(A-B)	Operating Records (all	Periodic/ On event basis	CARB LMR 95464(a)(1)(D) and	For Collection 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
Systems Shutdown Time		occurrences and duration of each)		95464(e)	< 5 days per event and For Control System: < 1 hour per event		
Startup Shutdown or Mal-function Procedures	40 CFR 63.1980(a-b)	Records (all occurrences, duration of each, corrective actions)	Periodic / Daily	40 CFR 63.6(e)	Minimize Emissions by Implementing SSM Plan	Continuous	N/A
Startup Shutdown or Mal-function Procedures	CARB LMR 95470(a)(1)(I)	Records of mitigation measures taken	Periodic / On event basis	CARB LMR 95464(e)(1-2)	Include any new components in Design Plan and minimize methane emissions	Continuous	N/A
Periods of Inoperation for Para-metric Monitors	District 1-523.4	Operating Records for All Parametric Monitors	Periodic / Daily	District 1-523.2	< 15 consecutive days per incident and < 30 calendar days	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
					per 12 month period		
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, calibrations, and required span adjustments	Continuous	N/A
Wellhead Pressure	District 8-34-414, 501.9 and 505.1	Monthly Inspection and Records	Periodic / Monthly	District 8-34-305.1	< 0 psig (Applies to all wells that are connected to the vacuum system)	Intermittent	Per NOV Number A63619, alleged violations of District Regulation 8, Rule 34, Section 305.1 (Wellhead Requirements) and California Code of Regulations (CCR) Section 95464(c) occurred at well KCLF2403. For more information see 30-day response included as Attachment A.
Wellhead Pressure	40 CFR 60.755(a)(3), 60.756(a)(1), and	Monthly Inspection and Records	Periodic / Monthly	40 CFR 60.753(b)	< 0 psig (Applies to all wells)	Intermittent	Per NOV Number A63619, alleged violations of District Regulation 8, Rule 34, Section

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	60.758(c) and (e)				that are connected to the vacuum system)		305.1 (Wellhead Requirements) and California Code of Regulations (CCR) Section 95464(c) occurred at well KCLF2403. For more information see 30-day response included as Attachment A.
Wellhead Pressure	CARB LMR 95469(c)	Monthly Inspection and Records	Periodic / Monthly	CARB LMR 95464(c)	< 0 psig (Applies to all wells that are connected to the vacuum system)	Intermittent	Per NOV Number A63619, alleged violations of District Regulation 8, Rule 34, Section 305.1 (Wellhead Requirements) and California Code of Regulations (CCR) Section 95464(c) occurred at well KCLF2403. For more information see 30-day response included as Attachment A.
Temperature of Gas at Wellhead	District 8-34-414, 501.9 and 505.2	Monthly Inspection and Records	Periodic / Monthly	District 8-34-305.2	< 55 °C (Applies to all wells that are connected to the vacuum 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
Temperature of Gas at Wellhead	40 CFR 60.755(a)(5), 60.756(a)(3), and 60.758(c) and (e)	Monthly Inspection and Records	Periodic / Monthly	40 CFR 60.753(c)	< 55 °C (Applies to all wells that are connected to the vacuum system)	Continuous	N/A
Temperature of Gas at Wellhead	District 8-34-414, 501.9, 505.2, and District Condition #17309, Part 19	Monthly or more frequent Inspection and Records	Periodic / Monthly, bimonthly, or weekly	District 8-34-505 and District Condition 17309, Part 19	<150 degrees F (Alternative wellhead temperature limit that applies only to wells specified in District Condition #17309, Part 19(b)(i))	Continuous	N/A
Gas Concentrations in LFG at Wellhead	District 8-34-414, 501.9 and 505.3 or 505.4	Monthly Inspection and Records	Periodic / Monthly	District 8-34-305.3 or 305.4	N ₂ < 20% (by volume, dry basis) OR O ₂ < 5% (Applies to all wells that are connected to the vacuum	Continuous	N/A

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					system, except for wells identified in Condition # 17309, Part 19b(i))		
Gas Concentration at Wellhead	40 CFR 60.755(a)(5), 60.756(a)(2), and 60.758(c) and (e)	Monthly Inspection and Records	Periodic / Monthly	40 CFR 60.753(c)	N2 < 20% OR O2 < 5% (Applies to all wells that are connected to the vacuum system, except for wells identified in Condition # 17309, Part 19b(i))	Continuous	N/A
Gas Concentrations at Wellhead	District Condition # 17309, Part 19b(ii and iii)	Monthly Inspection and Records	Periodic / Monthly	District Condition # 17309, Part 19b(i)	O2 < 15% (Applies to wells identified in Condition # 17309, Part 19b(i) that are	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
					connected to the vacuum system)		
Well Shutdown Limits	District 8-34-116.5 and 501.1	Records	Periodic / Daily	District 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	District 8-34-116.5 and 501.1	Records	Periodic / Daily	District 8-34-116.3	< 24 hours per well	Continuous	N/A
Well Shutdown Limits	District 8-34-117.6 and 501.1	Records	Periodic / Daily	District 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	District 8-34-117.6 and 501.1	Records	Periodic / Daily	District 8-34-117.5	< 24 hours per well or < 5 days per well for component	Intermittent	Well KCLF2518 was disconnected from vacuum for greater than 24 hours due to potential subsurface oxidation. 30-day deviation notification

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					replacements		was submitted on December 4, 2025. See notification for more information in Attachment B.
Well Shutdown Limits	District Condition # 17309, Part 19c(v)	Records	Periodic / Daily	District Condition # 17309, Parts 19c (i and ii)	For individual components that are temporarily disconnected from the vacuum system: < 5 components disconnected at any one time and < 120 days of vacuum disconnection time during any 12-month period for each individual component	Continuous	N/A
TOC (Total Organic Com-	District 8-34-501.6 and 503	Quarterly Inspection of	Periodic / Quarterly	District 8-34-301.2 and District	Component Leak Limit: <	Continuous	N/A

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pounds Plus Methane)	and District Condition # 17309, Part 19c(iv and v)	collection and control system components with OVA, Additional Inspection of Temporarily Disconnected Components and Records		Condition # 17309, Part 19c(iv)	1000 ppmv as methane		
TOC	District 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	District 8-34-303	Surface Leak Limit: < 500 ppmv as methane at 2 inches above surface	Continuous	N/A
TOC	Condition # 17309, Part 19b(iv-vi)	Monthly Inspection with OVA of Surface	Periodic / Monthly	District 8-34-303 and District Condition # 17309, Part 19b(iv)	Surface Leak Limit: < 500 ppmv	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
		(3 points within 15 m of well), Various Reinspection Times for Leaking Areas, and Records			as methane at 2 inches above surface (Applies to surface vicinity near wells identified in Condition # 17309, Part 19b(i) that are complying with an alternative wellhead oxygen standard instead of the 8-34-305.4 limit)		
TOC	40 CFR 60.755(c)(1), (4) and (5), 60.756(f), and 60.758(c) and (e)	Monthly Visual Inspection of Cover, Quarterly Inspection with OVA of Surface, Various	Periodic / Monthly, Quarterly, and on an Event Basis	40 CFR 60.753(d)	Surface Leak Limit: < 500 ppmv as methane at 5-10 cm from surface	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
		Reinspection Times for Leaking Areas, and Records					
Methane	CARB LMR 95469(a-b)	Quarterly Monitoring, Various Reinspection Times for Leaking Areas, and Records	Periodic / Quarterly / On event basis	CARB LMR 95465(a)	Surface Leak Limit: < 500 ppmv as methane at 5-10 cm from surface	Continuous	N/A
Non-Methane Organic Compounds (NMOC)	District 8-34-412 and 8-34-501.4 And District Condition # 17309, Parts 30 and 31	Initial and Annual Source Tests	Periodic / Annual	District 8-34-301.3	For Flares: > 98% removal by weight OR < 30 ppmvd @ 3% O ₂ , expressed as methane	Continuous	N/A
NMOC	40 CFR 60.8 and 60.752(b) (2)(iii)(B) and 60.758 (b)(2)(ii)	Initial and Annual Source Tests	Periodic / On event basis	40 CFR 60.752(b) (2)(iii)(B)	For Flares: > 98% removal by weight OR	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
					< 20 ppmvd @ 3% O ₂ , expressed as hexane		
Methane	CARB LMR 95469(b)(1)	Temperature Sensor and Recorder (continuous) and gas flow rate measuring device	Continuous	CARB LMR 95464(b)(2)(A)	For Flares: > 99% Methane removal by weight	Continuous	N/A
Temperature of Combustion Zone (CT)	District 8-34-501.3 and 507, and District Condition # 17309, Part 22	Temperature Sensor and Recorder (continuous)	Continuous	District Condition # 17309, Part 23	For A-1 Flare: CT > 1504 °F (3-hour average) For A-2 Flare: CT > 1400 °F (3-hour average)	Continuous	N/A
Temperature of Combustion Zone (CT)	40 CFR 60.756(b)(1) and 60.758 (b)(2)(i)	Temperature Sensor and Recorder (measured every 15 minutes and	Continuous	40 CFR 60.758 (c)(1)(i)	For A-1 Flare: CT > 1504 °F (3-hour average) from (CT > CTPF –	Continuous	N/A

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		averaged over performance test time period and 3-hours)			28 °C), where CTPF is the average combustion temperature during the most recent complying performance test, CTPF was 1554 °F during 10/13/04 test For A-2 Flare: CT will be determined during initial performance test		
POC (Precursor Organic Compounds)	District Condition # 17309, Part 33	Calculation Procedure (once every 5 years)	Periodic / On event basis	District Condition # 17309, Part 33	< 112.828 tons per year (fugitive POC from all landfill operations)	Continuous	N/A

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Total Carbon	District Condition # 17309, Part 36a-c	Records	Periodic / On event basis	District 8-2-301	< 15 pounds/day or < 300 ppm, dry basis only for aeration of or use as cover soil of soil containing < 50 ppmw of volatile organic compounds	Continuous	N/A
Amount of Contaminated Soil Aerated or Used as Cover	District Condition # 17309, Parts 36a-c and 37m	Records	Periodic / On event basis	District 8-40-116.1	< 1 cubic yard per project	Continuous	N/A
Amount of Contaminated Soil Aerated or Used as Cover	District 8-40-116.2 and District Condition # 17309, Parts 36a-c and 37m	Records	Periodic / On event basis	District 8-40-116.2	< 8 cubic yards per project, provided organic content < 500 ppmw and limited to 1 exempt project per 3 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
Amount of Accidental Spillage	None	N/A	None	District 8-40-117	Soil Contaminated by Accidental Spillage of < 5 gallons of Liquid Organic Compounds	Continuous	N/A
Total Aeration Project Emissions	District Condition # 17309, Part 37m	Records	Periodic / On event basis	District 8-40-118	< 150 pounds per project and toxic air contaminant emissions per year < District Table 2-5-1 limits	Continuous	N/A
Amount of Contaminated Soil Aerated or Used as Cover	District Condition # 17309, Parts 36a-c and 37m	Calculations and Records	Periodic / On event basis	District 8-40-301 and District Condition # 17309, Part 37k	Prohibited for Soil with Organic Content > 50 ppmw unless exempt per District 8-40-116, 117, or 118	Continuous	N/A

KELLER CANYON LANDFILL

TITLE V SEMI-ANNUAL MONITORING REPORT

Site: Keller Canyon Landfill	Facility ID#: A4618
Permitted Unit: S-1 KELLER CANYON LANDFILL, A-1 AND A-2 LANDFILL GAS FLARE; S-4 WASTE AND COVER MATERIAL DUMPING; S-5 EXCAVATING, BULLDOZING, AND COMPACTING ACTIVITIES	Reporting Period: <i>from</i> 09/01/2025 <i>through</i> 02/28/2026

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
Contaminated Soil Handling	District Condition # 17309, Part 37m	Records	Periodic / On event basis	District Condition # 17309, Part 37e	Limited to 2 on-site transfers per lot of contaminated soil	Continuous	N/A
Contaminated Soil On-Site Storage Time	District Condition # 17309, Part 37m	Records	Periodic / On event basis	District Condition # 17309, Part 37f-g	If organic content is: < 500 ppmw, storage time < 90 days; If organic content is: > 500 ppmw, storage time < 45 days	Continuous	N/A
SO ₂	None	N/A	None	District 9-1-301	Property Line Ground Level Limits: < 0.5 ppm for 3 minutes, < 0.25 ppm for 60 minutes, and <0.05 ppm for 24 hours	Continuous	N/A

KELLER CANYON LANDFILL

TITLE V SEMI-ANNUAL MONITORING REPORT

Site: Keller Canyon Landfill	Facility ID#: A4618
Permitted Unit: S-1 KELLER CANYON LANDFILL, A-1 AND A-2 LANDFILL GAS FLARE; S-4 WASTE AND COVER MATERIAL DUMPING; S-5 EXCAVATING, BULLDOZING, AND COMPACTING ACTIVITIES	Reporting Period: from 09/01/2025 through 02/28/2026

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
SO ₂	District Condition # 17309, Parts 31 and 34	Sulfur Analysis of Landfill Gas	Periodic / Quarterly	District 9-1-302	In Exhaust Gases From Flares: < 300 ppm (dry)	Continuous	N/A
H ₂ S	None	N/A	None	District 9-2-301	Property Line Ground Level Limits: < 0.06 ppm, averaged over 3 minutes and < 0.03 ppm, averaged over 60 minutes	Continuous	N/A
Total Reduced Sulfur (TRS) Com-pounds	District Condition # 17309, Parts 31 and 34	Sulfur Analysis of Landfill Gas	Periodic / Quarterly	District Condition # 17309, Part 34	In Collected Landfill Gas: < 300 ppmv (dry)	Continuous	N/A
Opacity	District Condition # 17309, Part 16j-l	Records of Water and Dust Suppressant Application	Periodic / Quarterly	District 6-1-301 and SIP 6-301	For Landfill Operations: < Ringelmann No. 1 for 3 minutes in any hour	Continuous	N/A
Opacity	District 8-34-501.3 and 507,	Temperature Sensor and	Continuous	District 6-1-301 and	For Flares: < Ringelmann	Continuous	N/A

KELLER CANYON LANDFILL

TITLE V SEMI-ANNUAL MONITORING REPORT

Site: Keller Canyon Landfill	Facility ID#: A4618
Permitted Unit: S-1 KELLER CANYON LANDFILL, A-1 AND A-2 LANDFILL GAS FLARE; S-4 WASTE AND COVER MATERIAL DUMPING; S-5 EXCAVATING, BULLDOZING, AND COMPACTING ACTIVITIES	Reporting Period: from 09/01/2025 through 02/28/2026

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
	and District Condition # 17309, Part 22	Recorder (continuous)		SIP 6-301	No. 1 for 3 minutes in any hour		
FP	None	N/A	None	District 6-1-310 and SIP 6-310	For Flares: < 0.15 grains/dscf	Continuous	N/A
Operating Time	District Condition # 17309, Parts 16a and 16i	Records of Waste Received and Truck Traffic	Periodic / Daily	District Condition # 17309, Part 1	Monday through Friday	Continuous	N/A
Waste Received	District Condition # 17309, Part 16a	Records of Waste Received	Periodic / Daily	District Condition # 17309, Part 2a	< 3500 tons per day	Continuous	N/A
Cumulative Waste In-Place	District Condition # 17309, Part 16a	Records of Waste Placed in Landfills	Periodic / Daily	District Condition # 17309, Part 2b	< 38.4 million tons (<34.8 million Mg)	Continuous	N/A
Design Capacity	District Condition # 17309, Parts 16a, 36a, and 37m	Records of Material Placed in Landfill	Periodic / Daily	District Condition # 17309, Part 2c	< 75 million yd3 (< 57.3 million m3) of all wastes and cover materials (excluding final cover)	Continuous	N/A

KELLER CANYON LANDFILL

TITLE V SEMI-ANNUAL MONITORING REPORT

Site: Keller Canyon Landfill	Facility ID#: A4618
Permitted Unit: S-1 KELLER CANYON LANDFILL, A-1 AND A-2 LANDFILL GAS FLARE; S-4 WASTE AND COVER MATERIAL DUMPING; S-5 EXCAVATING, BULLDOZING, AND COMPACTING ACTIVITIES	Reporting Period: from 09/01/2025 through 02/28/2026

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
Unpaved Road Length	District Condition # 17309, Part 12	Site Maps	Periodic / On event basis	District Condition # 17309, Part 5a	< 3000 feet from cover stockpile to working face midpoint	Continuous	N/A
Unpaved Road Length	District Condition # 17309, Part 12	Site Maps	Periodic / On event basis	District Condition # 17309, Part 5b	< 400 feet from end of main access road to working face midpoint	Continuous	N/A
Unpaved Road Length	District Condition # 17309, Part 12	Site Maps	Periodic / On event basis	District Condition # 17309, Part 5c	< 750 feet from end of paved road to end of main access road (this section must have 12 inches of gravel or crushed asphalt)	Continuous	N/A
Unpaved Road Length	District Condition # 17309, Part 12	Site Maps	Periodic / On event basis	District Condition # 17309, Part 5d	< 1400 feet of fire access roads	Continuous	N/A
Vehicle Speed	District Condition # 17309, Part 6	Posted Signs and	Periodic / On event basis	District Condition # 17309, Part 6	< 10 mph on unpaved	Continuous	N/A

KELLER CANYON LANDFILL

TITLE V SEMI-ANNUAL MONITORING REPORT

Site: Keller Canyon Landfill	Facility ID#: A4618
Permitted Unit: S-1 KELLER CANYON LANDFILL, A-1 AND A-2 LANDFILL GAS FLARE; S-4 WASTE AND COVER MATERIAL DUMPING; S-5 EXCAVATING, BULLDOZING, AND COMPACTING ACTIVITIES	Reporting Period: <i>from</i> 09/01/2025 <i>through</i> 02/28/2026

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
		Enforcement if Necessary			roads and < 25 mph on fire access roads		
Dust Suppressant Application Rate for Unpaved Roads	District Condition # 17309, Part 16k	Records	Periodic / Daily	District Condition # 17309, Part 8a-c	> 0.5 gallons per square yard of 10% magnesium chloride applied once every 30 days between May 1 and November 1 and once every 30 consecutive dry days between November 1 and May 1	Continuous	N/A
Water Application Rate for Roads	District Condition # 17309, Part 16i-j	Records	Periodic / Daily	District Condition # 17309, Parts 8 and 10	Once every fifth heavy duty vehicle and more often as necessary	Continuous	N/A

KELLER CANYON LANDFILL

TITLE V SEMI-ANNUAL MONITORING REPORT

Site: Keller Canyon Landfill	Facility ID#: A4618
Permitted Unit: S-1 KELLER CANYON LANDFILL, A-1 AND A-2 LANDFILL GAS FLARE; S-4 WASTE AND COVER MATERIAL DUMPING; S-5 EXCAVATING, BULLDOZING, AND COMPACTING ACTIVITIES	Reporting Period: <i>from</i> 09/01/2025 <i>through</i> 02/28/2026

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
Water Application Rate for Active face and Soil Areas	District Condition # 17309, Part 16 l	Records	Periodic / Daily	District Condition # 17309, Part 13	> 0.5 gallons per square yard twice per day on all dry days	Continuous	N/A
Truck Traffic Volume	District Condition # 17309, Part 16i	Records	Periodic / Daily	District Condition # 17309, Part 11a	< 175 transfer truck trips per annual average day	Continuous	N/A
Truck Traffic Volume	District Condition # 17309, Part 16i	Records	Periodic / Daily	District Condition # 17309, Part 11b	< 4 leachate truck trips per annual average day	Continuous	N/A
Truck Traffic Volume	District Condition # 17309, Part 16i	Records	Periodic / Daily	District Condition # 17309, Part 11c	< 45 scraper trips per annual average day	Continuous	N/A
Truck Traffic Trip Length	District Condition # 17309, Part 12	Site Maps and Records	Periodic / On event basis	District Condition # 17309, Part 12a	< 7800 feet for transfer trucks	Continuous	N/A
Truck Traffic Trip Length	District Condition # 17309, Part 12	Site Maps and Records	Periodic / On event basis	District Condition # 17309, Part 12b	< 3600 feet for leachate trucks	Continuous	N/A
Truck Traffic Trip Length	District Condition # 17309, Part 12	Site Maps and Records	Periodic / On event basis	District Condition # 17309, Part 12c	< 3000 feet for scrapers	Continuous	N/A

KELLER CANYON LANDFILL

TITLE V SEMI-ANNUAL MONITORING REPORT

Site: Keller Canyon Landfill	Facility ID#: A4618
Permitted Unit: S-1 KELLER CANYON LANDFILL, A-1 AND A-2 LANDFILL GAS FLARE; S-4 WASTE AND COVER MATERIAL DUMPING; S-5 EXCAVATING, BULLDOZING, AND COMPACTING ACTIVITIES	Reporting Period: from 09/01/2025 through 02/28/2026

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
NOx	District Condition # 17309, Part 30	Annual Source Test	Periodic / Annual	District Condition # 17309, Part 24	For both A-1 Flare and A-2 Flare: < 15 ppmv of NOx, expressed as NO2 at 15% O2, dry	Continuous	N/A
CO	District Condition # 17309, Part 30	Annual Source Test	Periodic / Annual	District Condition # 17309, Part 25	For A-1 Flare: < 114 ppmv of CO at 15% O2, dry For A-2 Flare: < 81 ppmv of CO at 15% O2, dry	Continuous	N/A
Acrylonitrile	District Condition # 17309, Part 31	Annual Laboratory Analysis	Periodic / Annual	District Condition # 17309, Part 32	Concentration in Landfill Gas: < 500 ppbv or Fugitive Emissions: < 60 pounds/year	Continuous	N/A
Benzene	District Condition # 17309, Part 31	Annual Laboratory Analysis	Periodic / Annual	District Condition # 17309, Part 32	Concentration in Landfill Gas: < 20,000 ppbv	Continuous	N/A

KELLER CANYON LANDFILL

TITLE V SEMI-ANNUAL MONITORING REPORT

Site: Keller Canyon Landfill	Facility ID#: A4618
Permitted Unit: S-1 KELLER CANYON LANDFILL, A-1 AND A-2 LANDFILL GAS FLARE; S-4 WASTE AND COVER MATERIAL DUMPING; S-5 EXCAVATING, BULLDOZING, AND COMPACTING ACTIVITIES	Reporting Period: from 09/01/2025 through 02/28/2026

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
					or Fugitive Emissions: < 3557 pounds/year		
Carbon Tetrachloride	District Condition # 17309, Part 31	Annual Laboratory Analysis	Periodic / Annual	District Condition # 17309, Part 32	Concentration in Landfill Gas: < 100 ppbv or Fugitive Emissions: < 35 pounds/year	Continuous	N/A
Chloroform	District Condition # 17309, Part 31	Annual Laboratory Analysis	Periodic / Annual	District Condition # 17309, Part 32	Concentration in Landfill Gas: < 100 ppbv or Fugitive Emissions: < 27 pounds/year	Continuous	N/A
Ethylene Dibromide	District Condition # 17309, Part 31	Annual Laboratory Analysis	Periodic / Annual	District Condition # 17309, Part 32	Concentration in Landfill Gas: < 100 ppbv or Fugitive Emissions: < 40 pounds/year	Continuous	N/A

KELLER CANYON LANDFILL

TITLE V SEMI-ANNUAL MONITORING REPORT

Site: Keller Canyon Landfill	Facility ID#: A4618
Permitted Unit: S-1 KELLER CANYON LANDFILL, A-1 AND A-2 LANDFILL GAS FLARE; S-4 WASTE AND COVER MATERIAL DUMPING; S-5 EXCAVATING, BULLDOZING, AND COMPACTING ACTIVITIES	Reporting Period: from 09/01/2025 through 02/28/2026

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
Ethylene Dichloride	District Condition # 17309, Part 31	Annual Laboratory Analysis	Periodic / Annual	District Condition # 17309, Part 32	Concentration in Landfill Gas: < 750 ppbv or Fugitive Emissions: < 169 pounds/year	Continuous	N/A
Methylene Chloride	District Condition # 17309, Part 31	Annual Laboratory Analysis	Periodic / Annual	District Condition # 17309, Part 32	Concentration in Landfill Gas: < 7,600 ppbv or Fugitive Emissions: < 1470 pounds/year	Continuous	N/A
Perchloroethylene	District Condition # 17309, Part 31	Annual Laboratory Analysis	Periodic / Annual	District Condition # 17309, Part 32	Concentration in Landfill Gas: < 3,300 ppbv or Fugitive Emissions: < 1246 pounds/year	Continuous	N/A
Trichloroethylene	District Condition # 17309, Part 31	Annual Laboratory Analysis	Periodic / Annual	District Condition # 17309, Part 32	Concentration in Landfill Gas: < 1,500 ppbv or Fugitive	Continuous	N/A

KELLER CANYON LANDFILL

TITLE V SEMI-ANNUAL MONITORING REPORT

Site: Keller Canyon Landfill	Facility ID#: A4618
Permitted Unit: S-1 KELLER CANYON LANDFILL, A-1 AND A-2 LANDFILL GAS FLARE; S-4 WASTE AND COVER MATERIAL DUMPING; S-5 EXCAVATING, BULLDOZING, AND COMPACTING ACTIVITIES	Reporting Period: <i>from</i> 09/01/2025 <i>through</i> 02/28/2026

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
					Emissions: < 449 pounds/year		
Vinyl Chloride	District Condition # 17309, Part 31	Annual Laboratory Analysis	Periodic / Annual	District Condition # 17309, Part 32	Concentration in Landfill Gas: < 1,700 ppbv or Fugitive Emissions: < 242 pounds/year	Continuous	N/A
Heat Input	District Condition # 17309, Part 35	Records	Periodic / Monthly	District Condition # 17309, Part 35	For A-1 Flare: < 1744.8 MM BTU per day and < 636,852 MM BTU per year For A-2 Flare: < 1824 MM BTU per day and < 665,760 MM BTU per year	Continuous	N/A

KELLER CANYON LANDFILL

TITLE V SEMI-ANNUAL MONITORING REPORT

Site: Keller Canyon Landfill	Facility ID#: A4618
Permitted Unit: S-1 KELLER CANYON LANDFILL, A-1 AND A-2 LANDFILL GAS FLARE; S-4 WASTE AND COVER MATERIAL DUMPING; S-5 EXCAVATING, BULLDOZING, AND COMPACTING ACTIVITIES	Reporting Period: <i>from</i> 09/01/2025 <i>through</i> 02/28/2026

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
Trackout onto Paved Roadways	District 6-6-501, District Permit Condition #17309, Part 38	Records	Periodic / Daily	District 6-6-301	Trackout causing visible emissions: < 25 linear feet for no more than 4 hours; and Trackout remaining on adjacent paved public roadway or paved shoulder: < 1 quart at end of each workday	Continuous	N/A
Visible Emissions from Cleaning Trackout	District 6-6-501, District Permit Condition #17309, Part 38	Records	Periodic / Daily	District 6-6-302	< Ringelmann No. 1 Limitation for no more than 3 minutes in any 60-minute period	Continuous	N/A

KELLER CANYON LANDFILL

TITLE V SEMI-ANNUAL MONITORING REPORT

Site:	Keller Canyon Landfill	Facility ID#:	A4618
Permitted Unit:	S-3 YARD AND GREEN WASTE STOCKPILES	Reporting Period:	<i>from</i> 09/01/2025 <i>through</i> 02/28/2026

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
Opacity	District Condition # 16462, Part 2	Visual Observation of Source in Operation	Continuous	District 6-1-301 and SIP 6-301	< Ringelmann No. 1 for 3 minutes in any hour	Continuous	N/A
Waste Received	District Condition # 16462, Part 6a and b	Records of Amount of Waste Received	Periodic / On event basis	District Condition # 16462, Part 1	< 225 tons per day and < 70,200 tons per 12-month period	Continuous	N/A
Waste Storage Time	District Condition # 16462, Part 6a and c	Records of Date and Time for Waste Receipt and Processing	Periodic / On event basis	District Condition # 16462, Part 3	< 4 days from receipt of waste	Continuous	N/A
Odorous Stockpile Storage Time	District Condition # 16462, Part 6a and c	Records of Date and Time for Waste Receipt and Processing	Periodic / On event basis	District Condition # 16462, Part 4	< 24 hours from the time the stockpile is deemed "odorous"	Continuous	N/A

Attachment A: NOV #A64480 30-Day Letter



Keller Canyon Landfill Company
901 Bailey Road, Pittsburg, CA 94565
c: 619.201.3765 republicservices.com

January 2, 2026

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

Re: 30-Day Response to Notice of Violation Number A63619
30-Day Title V Report
Keller Canyon Landfill, Pittsburg, California
Facility Number A4618

Dear Mr. Gove:

Keller Canyon Landfill Company (KCLC), owner and operator of the Keller Canyon Landfill (Keller, Facility Number A4618), located in Pittsburg, CA, submits this 10-Day Response to Notice of Violation (NOV) Number A63619. The NOV was issued by the Bay Area Air District (District) Inspector, Ms. Lily Law, to Keller on December 3, 2025, which can be found in **Attachment A**. This letter also satisfies the regulatory requirements for the 30-day Title V Reports required by the Title V Permit Condition Section I.F (Monitoring Reports).

NOV Number A63619

NOV Number A63619 was issued by District inspector Ms. Lily Law for an alleged violation of District Regulation 8, Rule 34, Section 305.1 (Wellhead Requirements) and Regulation 2, Rule 6, Section 307 (Failure to Meet Permit Condition) for alleged wellhead, KCLF2403, not operating under a vacuum, and alleged late submission of the Title V deviation reports, respectively.

District Regulation 8-34-305 and -414

District Rule 8-34-305 states the following:

Effective July 1, 2002 and except as provided in Sections 8-34-119 or 120, each wellhead in the gas collection system shall meet the requirements of Sections 8-34-305.1 and 305.2 and either 305.3 or 305.4, unless the operator has discovered the excess and has satisfied all of the requirements of Section 8-34-414; or the operator has received permit conditions containing alternative operating levels:

Well KCLF2403 was not out of compliance with the 8-34-305 requirements once the well was taken offline due to concerns of a subsurface oxidation (SSO). Keller followed protocol outlined in the GCCS design plan submitted to the District in September of 2021. The Design Plan, section 5.1.1.2, notes that wells that are shutdown due to risk of subsurface oxidation, will be

continued to be read at least monthly as required, but positive pressure will not be considered exceedances of the operating limits. The primary objective is to mitigate conditions within the landfill that could foster SSO while minimizing surface emissions into the atmosphere. Keller's operations and maintenance team, SCSFS, continued to monitor the well and surrounding area to confirm the SSO had not affected other areas and closed additional wells to reduce potential emissions from the SSO. Additional information on corrective actions can be found in the 30-day Title V Deviation letter for SSO event, previously submitted to the District, Attachment B.

Moreover, it is Keller's understanding that the Title V deviation reports were submitted within the appropriate timelines. There were some individual signs of potential SSO prior to August 1, 2025, as stated in the Title V Deviation letters, not all symptoms need to be present to confirm an SSO event is occurring but any one symptom alone is not sufficient to assume an SSO. With the indicators and further inspections at the time, Keller confirmed the SSO on August 1, 2025 and therefore submitted the 10-day deviation report on August 11, 2025 and the 30-day deviation report on August 29, 2025.

Keller respectfully requests that NOV A63619 be rescinded, as Well KCLF2403 was shutdown due to the potential SSO and therefore the positive pressure was not considered an exceedance as the readings were taken to monitor the SSO event. Once the SSO was managed and the well was reconnected to vacuum, there were no instances of positive pressure. Furthermore, the Title V deviation reports were submitted within 10 and 30 days of August 1, 2025, within the required timeframes.

Conclusion

KCLC is vigilant about ensuring the gas collection and control system (GCCS) at Keller is operating in compliance with all applicable regulations and permit conditions. KCLC respectfully requests that NOV A63619 be rescinded as the well was taken offline and monitored under positive pressure to mitigate the risk of the SSO expanding and reported via Title V Deviation reports within the relevant timelines.

If you have any questions, please do not hesitate to contact Maria Bowen at (619) 455-9518 or mbowen@SCSEngineers.com or Antonia Gunner at agunner@republicservices.com.

Sincerely,



Alisha McCutcheon
Environmental Manager
Keller Canyon Landfill

Mr. Jeffery Gove
January 2, 2026
Page 3

cc: Antonia Gunner, KCLC
 Lily Law, District
 Maria Bowen, SCS Engineers

Enclosure: Attachment A: NOV Number A63619
 Attachment B: 10-Day and 30-Day Title V Deviation Reports

Attachment A: NOV Number A63619



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. **A63619**

ISSUED TO: <u>Keller Canyon Landfill Company</u>	☒ P ☐ G ☐ N# <u>4618</u>
ADDRESS: <u>901 Bailey Road</u>	
CITY: <u>Pittsburg</u>	STATE: <u>CA</u> ZIP: <u>94565</u>
PHONE: (510) <u>262-7577</u>	
☒ N# Mailing Address on F61	

OCCURRENCE	
NAME: _____	
ADDRESS: _____	☒ Same As Above
CITY: _____	ZIP: _____
SOURCE: S# <u>1</u>	NAME: <u>Keller Canyon Landfill - Waste Decomposition Process</u>
EMISSION PT: P# _____	NAME: _____
DATE: <u>7/22/2025</u>	TIME: <u>1226</u> HRS

☐ REG 2 RULE 1 SEC 301 No Authority to Construct	☐ REG 2 RULE 1 SEC 302 No Permit to Operate
☐ REG 1 SEC 301 H & S CODE - 41700 Public Nuisance	☒ REG 2 RULE <u>6</u> SEC 307 Failure to Meet Permit Condition
☐ REG 5 SEC 301 Prohibited Open Burning	☐ REG 6 RULE 1 SEC 301 Excessive Visible Emissions
☒ REG <u>8</u> RULE <u>34</u> SECTION <u>305.1</u> CODE	
☐ REG _____ RULE _____ SECTION _____ CODE	
Details: <u>Wellhead not operating under a vacuum (negative pressure); Late submission of Title V deviation reports</u>	

RECIPIENT NAME: Alisha McCutcheon
TITLE: Environmental Manager

SIGNING THIS NOTICE IS NOT
AN ADMISSION OF GUILT

x Alisha L. McCutcheon

➔ **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: <u>Lily Law</u>	INSP # <u>919</u>
DATE: <u>12/3/2025</u>	TIME: <u>1610</u> HRS ☒ MAILED

PLEASE PRESS HARD

Sent Via E-mail

Continued On Reverse

Attachment B: 10-Day and 30-Day Title V Deviation Reports



Keller Canyon Landfill Company
901 Bailey Road, Pittsburg, CA 94565
c: 619.201.3765 republicservices.com

August 11, 2025
(Revised October 16, 2025)

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

Re: Combined 10-Day Title V Report
Special Occurrence Notification for BAAQMD Regulation 8, Rule 34, Subpart 305
Subsurface Oxidation (SSO) Event
Keller Canyon Landfill, Pittsburg, California
Facility Number A4618

Dear Mr. Gove:

Keller Canyon Landfill Company (KCLC), owner and operator of the Keller Canyon Landfill (Keller, Facility Number A4618), located in Pittsburg, CA, submits this combined 10-Day Title V Report to the Bay Area Air District (BAAD or District) per Title V Permit Standard Conditions Section I.F (Monitoring Reports) for a subsurface oxidation (SSO) event that was confirmed at Keller on August 1, 2025. There were some signs of potential SSO prior to August 1, 2025 but it was not yet confirmed if notification was needed. Keller has the start date listed as August 1, 2025 however the District requested that the start date be updated to July 14, 2025. A subsequent 30-day Title V Report will be submitted by August 31, 2025. As of submittal of this notification, the SSO event has been contained. Note that the original deviation was requested for District Regulation 117.5, as the extended downtime was not requested prior to the event occurring.

This notification is being submitted out of an abundance of caution. Pursuant to District Regulation 8-34-305:

"Effective July 1, 2002 and except as provided in Sections 8-34-119 or 120, each wellhead in the gas collection system shall meet the requirements of Sections 8-34-305.1 and 305.2 and either 305.3 or 305.4, unless the operator has discovered the excess and has satisfied all of the requirements of Section 8-34-414; or the operator has received permit conditions containing alternative operating levels:

305.1 Each wellhead shall operate under a vacuum (negative pressure); and

305.2 The landfill gas temperature in each wellhead shall be less than 55° C (131°F); and either

305.3 The nitrogen concentration in each wellhead shall be less than 20% by volume; or

305.4 The oxygen concentration in each wellhead shall be less than 5% by volume"

Note that regulation 8-34-305 is being referenced at the explicit request of the District. However, Keller does not believe that well KCLF2403 was out of compliance with the 8-34-305 requirements once the well was taken offline. The readings collected while the well was offline were to monitor the gas composition and temperature at the well boring, as allowed under District Rule 8-34-117.4.

Background

On July 14, 2025 various SSO indicators, including balance gas of about 80 percent (%) and methane close to 0%, were detected at well KCLF2403 during field inspection and data review by the site's operations and maintenance (O&M) team, SCS Field Services (SCSFS). Following the initial data discovery, O&M personnel inspected the surrounding area for additional SSO indicators. Additionally, well KCLF2403 was closed on July 17, 2025 in an effort to bring I gas quality to a typical range, between 45 and 55%. Out of an abundance of caution, immediate actions to protect human and environmental health and safety were taken by O&M personnel, as wells within a 200 and 300-foot radius were checked for carbon monoxide (CO). A map of the SSO area is included in **Attachment A**.

Root Cause and Remediation

As of the submittal of this notification, KCLF2403 remains 100% closed, but has continued to be read to monitor the progression of the SSO. On July 29, 2025, the methane concentration at KCLF2403 returned to typical readings of around 50%, and the balance gas also exhibited normal concentrations of around 0-1%.

CO readings were taken at wells within a 300 foot radius of KCLF2403 and the results indicated that the SSO appears to be isolated. The CO readings at KCLF2403 resulted in 3,000 ppm on July 22, 2025, and 150 ppm on July 29, 2025. SCSFS placed soil around KCLF2403 to assist in the case of any short circuit coming from the well casing.

Wells within a 300-foot radius of the SSO area were turned down from vacuum to prevent further air intrusion and vacuum influence, which could potentially fuel and further spread the SSO. O&M personnel utilized isolation valves to close off the affected area and to avoid additional disruption of the gas collection and control system (GCCS). The A-2 and A-3 Flares were not affected during this event due to the use of isolation valves and no GCCS downtime accrued as a result of the SSO. No interruption of the landfill GCCS operation, changes in waste acceptances, or damage to existing infrastructure occurred as a result of this SSO event.

At the time of this submittal, no additional visible indicators of SSO conditions have been observed since July 29, 2025. Additional well readings and CO sampling results indicate a reduction in CO concentrations near the area of discovery, as well as stable LFG monitoring results. The most recent wellfield monitoring and CO sampling results are included in

Attachment B. Based on these monitoring results, KCLC believes the SSO has been fully contained and will continue to closely monitor the area.

Once the readings at KCLF2403 consistently show no indication of SSO, the valve will be turned to the minimum position and vacuum will slowly be increased over time to reduce potential reignition of the SSO. With time as the SSO is believed to be contained, LFG monitoring and CO sampling will also be reduced to a weekly and monthly basis as needed for wells within a 300 and 500-foot radius of the point of discovery. O&M personnel will continue to monitor the area and perform additional cover inspections and maintenance to any surface penetrations and/or cracking. Documentation of additional corrective actions completed as of the date of this submittal are provided in **Attachment C**.

Preventative Measures

KCLC is committed to ensuring the prevention of future SSO events and prioritizes quick response following detection of any potential SSO indicators. KCLC and O&M personnel routinely review wellfield monitoring data and inspect the overall integrity of the GCCS to ensure optimal operation. The practices described in this letter have been reviewed with site and O&M personnel to ensure KCLC proactively monitors the site for any indicators of potential SSO. Potential indicators of SSO events include, but are not limited to:

- Dramatic localized landfill settlement;
- Charred or cracked surface cover;
- Stressed or dead vegetation in an area that is otherwise properly vegetated;
- Smoke or smoky odor emanating from the landfill surface or wellhead;
- Drastic or unusual increase in flowing gas temperature;
- Significant drop in methane content in the gas;
- Abnormal discoloration of wellhead/riser assembly;
- Abnormally high CO and ammonia {NH₃} concentration in LFG; and
- Deformed riser pipes.

Upon detection of any of the above indicators, KCLC and O&M personnel have standard practices that are followed to investigate the area for potential SSOs, as was practiced at the KCLF2403 event. Note that not all symptoms need to be present to confirm an SSO event is occurring but any one symptom alone is not sufficient to assume an SSO.

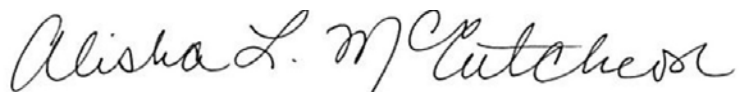
Additionally, all higher operating value (HOV) wells at the landfill are closely monitored. If temperature increases or comes close to the HOV limit, additional monitoring is conducted. KCLC will continue to conduct fire investigations when any wellhead temperature exceeds 145 degrees Fahrenheit and measure CO concentrations using Draeger tubes and wellhead temperatures until results indicates a safe level (CO concentrations under 100 ppmv with temperatures under 140 degrees Fahrenheit).

Conclusion

KCLC is submitting this 10-Day Title V Report out of an abundance of caution pursuant to Title V Permit Standard Conditions Section I.F {Monitoring Reports}; a subsequent 30-day Title V Report will be submitted by August 31, 2025. KCLC has maintained full transparency with the District in providing site records, as well as further clarification on the SSO event. KCLC is committed to operating its systems in compliance with all applicable regulations and assuring the health and safety of its personnel.

If you have any questions, please do not hesitate to contact Maria Bowen at (619) 455-9518 or mbowen@SCSEngineers.com or Alisha McCutcheon at AMcCutcheon@republicservices.com.

Sincerely,



Alisha McCutcheon
Environmental Manager
Keller Canyon Landfill

cc: Antonia Gunner, KCLC
Leo Castellblanch, District
Maria Bowen, SCS Engineers

Enclosure: Attachment A: Map of SSO Area
Attachment B: Wellfield Monitoring
Attachment C: Daily Logs

Attachment A: NOV Number A62509



Attachment B: June 27, 2023 118 Plan

Point ID	Record Date	CH4 [%]	CO2 [%]	O2 [%]	Bal Gas [%]	CO [ppmv]	Init Temp [°F]	Adj Temp [°F]	Init Stat Press ["H2O]	Adj Stat Press ["H2O]	Init Flow [scfm]	Adj Flow [scfm]	Sys Pressure ["H2O]	Comments
KCLF2403	6/2/2025 2:20:43 PM	52.1	37.1	1.0	9.8		130.7	130.7	-1.90	-1.90	8.5	8.4	-37.44	No Change
KCLF2403	6/29/2025 5:15:17 PM	55.9	43.1	0.1	0.9		128.2	128.8	-0.02	-0.10	4.9	4.9	-33.50	Opened valve 1/2 turn or less
KCLF2403	6/29/2025 5:17:48 PM	54.3	45.7	0.0	0.0		129.1	129.1	-0.27	-0.26	4.8	4.8	-33.76	Second Reading
KCLF2403	7/14/2025 4:23:33 PM	0.4	8.7	9.3	81.6		134.3	135.0	-0.42	-0.42	0.0	0.0	-34.93	No Change
KCLF2403	7/14/2025 4:24:44 PM	0.9	8.5	9.8	80.8		133.3	136.9	-0.38	-0.37	0.0	0.0	-35.11	Second Reading
KCLF2403	7/17/2025 11:21:43 AM	0.3	9.6	9.8	80.3		85.7	86.0	-0.07	-0.07	0.0	0.0	-3.64	No Change
KCLF2403	7/21/2025 12:48:06 PM	0.0	6.4	13.3	80.3		71.4	71.4	-0.03	-0.02	0.0	0.0	-33.55	No Change
KCLF2403	7/22/2025 12:25:00 PM					3000								
KCLF2403	7/22/2025 12:26:46 PM	0.0	8.1	10.0	81.9		78.2	78.3	0.02	0.02	0.0	0.0	-32.26	Valve 100% Closed
KCLF2403	7/22/2025 12:28:24 PM	0.2	8.0	10.9	80.9		77.8	77.9	0.02	0.02	2.3	2.1	-32.61	Second Reading
KCLF2403	7/23/2025 10:14:53 AM	32.0	34.5	0.0	33.5		89.3	89.4	0.14	0.19	0.0	0.0	-31.42	No Change
KCLF2403	7/29/2025 11:20:32 AM					150								N=1
KCLF2403	7/29/2025 11:36:21 AM	54.3	45.6	0.2			88.1	88.2	0.45	0.44	0.0	0.0	-26.04	Valve 100% Closed
KCLF2403	7/29/2025 11:37:08 AM	52.8	46.2	0.1	0.9		88.6	88.6	0.38	0.38	0.0	0.0	-26.15	Second Reading
KCLF2403	8/4/2025 2:09:42 PM	52.6	47.4	0.0	0.0		93.4	93.4	0.51	0.51	0.0	0.0	-36.82	No Change
KCLF2403	8/6/2025 12:20:58 PM	55.0	44.9	0.1	0.0		97.2	97.2	0.14	0.17	0.0	0.0	-0.42	No Change

Attachment C: August 24 and 31, 2023 Re-Monitoring Results



Keller Daily Log

Date	2025-07-21	Weather	Clear	Temp	78
SCS Personnel	Task	ST Hours	OT hours	Total Hours	
Will Spurgeon	07225016.01. 00001	5			
DAILY TOTAL					
SCS Equipment		QUANTITY			
Gem 5000		1			
Mx4		1			
Drager tubes co 3000		7			
RENTAL EQUIPMENT		QUANTITY	TERMINATION NUMBER ?		
Summary of Activities					
Arrived on site to follow up on well 2403 did another Drager tube and got gem reading with valve fully closed worked on Dreger tubing surrounding wells in the 250 foot radius and gas readings. Also had to reset FL 100 two times during the day. also uploaded all dragger results to mobile form Keller Dreger results.					



Keller Daily Log

Date	2025-07-22	Weather	Partly Cloudy	Temp	78
SCS Personnel	Task	ST Hours	OT hours	Total Hours	
Will Spurgeon	07225016.01. 00001	6			
Will Spurgeon	07225016.00	2			
DAILY TOTAL					
SCS Equipment		QUANTITY			
Gem 5000		1			
Mx4		1			
Drager tubes co		10			
RENTAL EQUIPMENT		QUANTITY	TERMINATION NUMBER ?		
Summary of Activities					
Arrived on site went directly to 2403 got gas reading and drager tubed that well also got readings and Dreger tubes on all wells within the 300 foot radius. It was approximately 10 wells to follow up on that SSO event read a few more wells uploaded all dragger results to Keller Dreger tube form. picked up final gas quality at the flare..					



Keller Daily Log

Date	2025-07-23	Weather	Partly Cloudy	Temp	78
SCS Personnel	Task	ST Hours	OT hours	Total Hours	
Will Spurgeon	07225016.00	8			
DAILY TOTAL					
SCS Equipment		QUANTITY			
Gem 5000		1			
Mx4		1			
Dreager tube		1			
RENTAL EQUIPMENT		QUANTITY	TERMINATION NUMBER ?		
Summary of Activities					
Start out the day had to go by office to get more Dreger tubes for SSO event got another reading on 2403 and took dreager sample read wells in well field also found Wells in field with low system pressure the numbers are 2319, 2400, 2517. Also move rocks away from well casing on 2403. System pressure went low due to RNG failure in the afternoon.					



Keller Canyon Landfill Company
901 Bailey Road, Pittsburg, CA 94565
c: 619.201.3765 republicservices.com

August 29, 2025
(Revised October 16, 2025)

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

Re: 30-Day Title V Report
Special Occurrence Notification for District Regulation 8, Rule 34, Subpart 305
Keller Canyon Landfill, Pittsburg, California
Facility Number A4618

Dear Mr. Gove:

Keller Canyon Landfill Company (KCLC), owner and operator of the Keller Canyon Landfill (Keller, Facility Number A4618), located in Pittsburg, CA, submits this 30-Day Title V Report to the Bay Area Air District (District) per Title V Permit Standard Conditions Section I.F (Monitoring Reports) for a potential subsurface oxidation (SSO) event that was confirmed at Keller on August 1, 2025. There were some signs of potential SSO prior to August 1, 2025 but it was not yet confirmed if notification was needed. Keller has the start date listed as August 1, 2025 however the District requested that the start date be updated to July 14, 2025. A previous 10-day Title V Report was submitted on August 11, 2025. As of submittal of this notification, the event has been mitigated. Note that the original deviation was requested for District Regulation 117.5, as the extended downtime was not requested prior to the event occurring.

This notification is being submitted out of an abundance of caution. Pursuant to District Regulation 8-34-305:

"Effective July 1, 2002 and except as provided in Sections 8-34-119 or 120, each wellhead in the gas collection system shall meet the requirements of Sections 8-34-305.1 and 305.2 and either 305.3 or 305.4, unless the operator has discovered the excess and has satisfied all of the requirements of Section 8-34-414; or the operator has received permit conditions containing alternative operating levels:

305.1 Each wellhead shall operate under a vacuum (negative pressure); and

305.2 The landfill gas temperature in each wellhead shall be less than 55° C (131°F); and either

305.3 The nitrogen concentration in each wellhead shall be less than 20% by volume; or

305.4 The oxygen concentration in each wellhead shall be less than 5% by volume"

Note that regulation 8-34-305 is being referenced at the explicit request of the District. However, Keller does not believe that well KCLF2403 was out of compliance with the 8-34-305 requirements once the well was taken offline. The readings collected while the well was offline were to monitor the gas composition and temperature at the well boring, as allowed under District Rule 8-34-117.4.

Background

On July 14, 2025, various potential SSO indicators, including balance gas of about 80 percent (%) and methane close to 0%, were detected at Well KCLF2403 during routine field inspection and data review by the site's operations and maintenance (O&M) team, SCS Field Services (SCSFS). Following the initial data discovery, O&M personnel inspected the surrounding area for additional SSO indicators. Additionally, Well KCLF2403 was closed on July 17, 2025 in an effort to bring landfill gas (LFG) quality to a typical range, between 45 and 55% of methane. Out of an abundance of caution, immediate actions to protect human and environmental health and safety were taken by O&M personnel, as visual observations of the surrounding area were recorded and wells within a 200 and 300-foot radius were monitored for carbon monoxide (CO). A map of the area is included in **Attachment A**.

On July 29, 2025, the methane concentration at KCLF2403 returned to typical levels of around 50%, and the balance gas also exhibited normal concentrations of around 0-1%. CO readings were taken at wells within a 300 foot radius of KCLF2403 and the results indicated that the potential SSO conditions appeared to be isolated. The CO readings at KCLF2403 results are include in Table 1, below.

Table 1. CO Monitoring Results

CO (parts per million [ppm])	Date
3,000	July 22, 2025
150	July 29, 2025
75	August 18, 2025
100	August 20, 2025

Primarily actions were taken for wells within a 300-foot radius of the potential SSO area, vacuum was decreased (as needed) to prevent the potential of further air intrusion and vacuum influence on Well KCLF2403. O&M personnel took additional precautions and utilized isolation valve at the wellhead to close off the affected LFG well and to avoid additional disruption of the gas collection and control system (GCCS). O&M additionally placed soil and betonite around KCLF2403 to assist in the case of any short circuit coming from the well casing. The A-2 and A-3 Flares, and the Ameresco owned engine plant and renewable natural gas (RNG) facility, were not affected during this event due to the use of isolation valve and no GCCS downtime accrued as a result of the event. No interruption of the landfill GCCS operation, changes in waste acceptances, or damage to existing infrastructure occurred as a result of this event.

Additional well readings and CO sampling results indicate a reduction in CO concentrations near the area of discovery, as well as stabilized LFG monitoring results. The most recent wellfield monitoring and CO sampling results are included in **Attachment B**. Based on these monitoring results, KCLC believes the potential SSO was identified proactively has been fully mitigated, avoiding further development and potential system damage or health and safety concerns. Well KCLF2403 was returned to vacuum on August 21, 2025. The O&M team will continue to closely observe the well and surrounding area during future monitoring events.

Preventative Measures Taken

KCLC and O&M personnel routinely review wellfield monitoring data and inspect the overall integrity of the GCCS to ensure optimal operation. The practices described in this letter have been reviewed with site and O&M personnel to ensure KCLC proactively monitors the site for any indicators of potential SSO. Potential indicators of SSO events include, but are not limited to:

- Dramatic localized landfill settlement;
- Charred or cracked surface cover;
- Stressed or dead vegetation in an area that is otherwise properly vegetated;
- Smoke or smoky odor emanating from the landfill surface or wellhead;
- Drastic or unusual increase in flowing gas temperature;
- Significant drop in methane content in the gas;
- Abnormal discoloration of wellhead/riser assembly;
- Abnormally high CO and ammonia (NH₃) concentration in LFG; and
- Deformed riser pipes.

Note that not all symptoms need to be present to confirm an SSO event is occurring but any one symptom alone is not sufficient to assume an SSO. KCLC and O&M personnel followed the standard practices at the KCLF2403 event to investigate the area for potential SSO event.

Additionally, all higher operating value (HOV) wells at the landfill are closely monitored routinely. If temperature increases or comes close to the HOV limit, additional monitoring is conducted. KCLC will continue to conduct SSO investigations when any wellhead temperature exceeds 145 degrees Fahrenheit and measure CO concentrations using Draeger tubes and wellhead temperatures until results indicates a safe level (CO concentrations under 100 ppmv with temperatures under 140 degrees Fahrenheit).

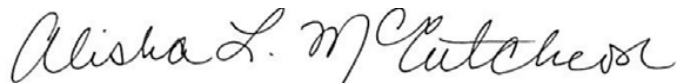
O&M personnel will continue to monitor the area and perform additional cover inspections and maintenance to any surface penetrations and/or cracking. Documentation of additional corrective actions completed as of the date of this submittal are provided in **Attachment C**.

Conclusion

KCLC is committed to ensuring the prevention of future potential SSO events and prioritizes quick response following detection of any potential SSO indicators. KCLC is submitting this 30-Day Title V Report out of an abundance of caution pursuant to Title V Permit Standard Conditions Section I.F (Monitoring Reports). KCLC has maintained full transparency with the District in providing site records, as well as further clarification on the event. KCLC is committed to operating its systems in compliance with all applicable regulations and assuring the health and safety of its personnel.

If you have any questions, please do not hesitate to contact Maria Bowen at (619) 455-9518 or mbowen@SCSEngineers.com or Alisha McCutcheon at AMcCutcheon@republicservices.com.

Sincerely,

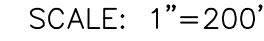


Alisha McCutcheon
Environmental Manager
Keller Canyon Landfill

cc: Antonia Gunner, KCLC
 Leo Castellblanch, Bay Area Air District
 Maria Bowen, SCS Engineers
 Sean Bass, SCS Field Services

Enclosure: Attachment A: Map of Potential SSO Area
 Attachment B: Wellfield Monitoring Data
 Attachment C: Daily Logs

Attachment A: Map of Potential SSO Area



GENERAL DRAWING NOTES:

- SCS ENGINEERS**
ENVIRONMENTAL CONSULTANTS

3900 KILROY AIRPORT WAY STE100
LONG BEACH, CA 90806
(562)426-0544

PROJ. NO. 01221

OSN. BY: NH

DATE: 03/12/2025

SCALE: AS SHOWN

SHEET:

DATE _____

REVISION

No.

SHEET TITLE: EXISTING COCS MAP

PROJECT TITLE:

CLIENT:

SCS ENGINEERS
ENVIRONMENTAL CONSULTANTS

3900 KILROY AIRPORT WAY STE100
LONG BEACH, CA 90806
(562)426-0544

PROJ. NO. 01221

DATE: 03/12/2025

SCALE: AS SHOWN

SHEET:

Attachment B: Wellfield Monitoring Data

Point ID	Record Date	CH4 [%]	CO2 [%]	O2 [%]	Bal Gas [%]	Init Temp [°F]	Adj Temp [°F]	Init Stat Press ["H2O]	Adj Stat Press ["H2O]	Init Diff Press ["H2O]	Adj Diff Press ["H2O]	Init Flow [scfm]	Adj Flow [scfm]	Sys Pressure ["H2O]	Comments
KCLF2403	6/2/2025 2:20:43 PM	52.1	37.1	1.0	9.8	130.7	130.7	-1.90	-1.90	0.430	0.425	8.5	8.4	-37.44	Comments:No Change,,,,,,
KCLF2403	6/29/2025 5:15:17 PM	55.9	43.1	0.1	0.9	128.2	128.8	-0.02	-0.10	0.147	0.143	4.9	4.9	-33.50	Comments:Opened valve 1/2 turn or less,,,,,,
KCLF2403	6/29/2025 5:17:48 PM	54.3	45.7	0.0	0.0	129.1	129.1	-0.27	-0.26	0.141	0.144	4.8	4.8	-33.76	Comments:Second Reading,,,,,,
KCLF2403	7/14/2025 4:23:33 PM	0.4	8.7	9.3	81.6	134.3	135.0	-0.42	-0.42	-1.136	-1.131	0.0	0.0	-34.93	Comments:No Change,,,,,,
KCLF2403	7/14/2025 4:24:44 PM	0.9	8.5	9.8	80.8	133.3	136.9	-0.38	-0.37	-1.006	-0.877	0.0	0.0	-35.11	Comments:Second Reading,,,,,,
KCLF2403	7/17/2025 11:21:43 AM	0.3	9.6	9.8	80.3	85.7	86.0	-0.07	-0.07	-0.032	-0.029	0.0	0.0	-3.64	Comments:No Change,,,,,,
KCLF2403	7/21/2025 12:48:06 PM	0.0	6.4	13.3	80.3	71.4	71.4	-0.03	-0.02	-0.014	-0.013	0.0	0.0	-33.55	Comments:No Change,,,,,,
KCLF2403	7/22/2025 12:26:46 PM	0.0	8.1	10.0	81.9	78.2	78.3	0.02	0.02	-0.004	-0.003	0.0	0.0	-32.26	Comments:Valve 100% Closed,,,,,,
KCLF2403	7/22/2025 12:28:24 PM	0.2	8.0	10.9	80.9	77.8	77.9	0.02	0.02	0.030	0.026	2.3	2.1	-32.61	Comments:Second Reading,,,,,,
KCLF2403	7/23/2025 10:14:53 AM	32.0	34.5	0.0	33.5	89.3	89.4	0.14	0.19	-0.015	-0.007	0.0	0.0	-31.42	Comments:No Change,,,,,,
KCLF2403	7/29/2025 11:36:21 AM	54.3	45.6	0.2		88.1	88.2	0.45	0.44	-0.049	-0.045	0.0	0.0	-26.04	Comments:Valve 100% Closed,,,,,,
KCLF2403	7/29/2025 11:37:08 AM	52.8	46.2	0.1	0.9	88.6	88.6	0.38	0.38	-0.037	-0.035	0.0	0.0	-26.15	Comments:Second Reading,,,,,,
KCLF2403	8/4/2025 2:09:42 PM	52.6	47.4	0.0	0.0	93.4	93.4	0.51	0.51	-0.028	-0.032	0.0	0.0	-36.82	Comments:No Change,,,,,,
KCLF2403	8/6/2025 12:20:58 PM	55.0	44.9	0.1	0.0	97.2	97.2	0.14	0.17	-0.043	-0.038	0.0	0.0	-0.42	Comments:No Change,,,,,,
KCLF2403	8/12/2025 10:31:36 AM	53.8	46.2	0.0	0.0	75.7	75.7	0.42	0.43	-0.058	-0.058	0.0	0.0	-36.79	Comments:No Change,,,,,,
KCLF2403	8/18/2025 12:49:58 PM	53.7	44.8	0.0	1.5	86.1	94.6	0.14	0.05	-0.050	-0.017	0.0	0.0	-35.41	Comments:Opened valve 1/2 turn or less,,,,,,
KCLF2403	8/18/2025 12:51:18 PM	53.7	45.0	0.0	1.3	91.7	91.6	0.01	0.03	-0.022	-0.021	0.0	0.0	-35.91	Comments:Second Reading,,,,,,
KCLF2403	8/21/2025 2:24:56 PM	54.9	45.0	0.0	0.1	109.4	117.1	0.24	-0.21	0.018	0.054	4.0	6.8	-29.82	Comments:Opened valve 1/2 turn or less,,,,,,
KCLF2403	8/21/2025 2:25:46 PM	53.9	45.0	0.0	1.1	120.7	121.0	-0.32	-0.30	0.017	0.025	3.8	4.6	-31.35	Comments:Second Reading,,,,,,
KCLF2403	8/22/2025 12:44:56 PM	56.6	43.4	0.0	0.0	121.4	122.8	-0.37	-0.41	-0.107	-0.136	0.0	0.0	-33.46	Comments:Opened valve 1/2 turn or less,,,,,,
KCLF2403	8/22/2025 12:46:03 PM	55.2	44.8	0.0	0.0	121.2	121.6	-0.42	-0.42	-0.095	-0.098	0.0	0.0	-33.45	Comments:Second Reading,,,,,,

Point ID	Point Name	Status	Record Date	Analysis Method	CO Reading [ppmv]	Comments
KCLF2403	2403	Active	7/22/2025 12:25:00 PM	Draeger® / Other	3000	
KCLF2403	2403	Active	7/29/2025 11:20:32 AM	Draeger® / Other	150	N=1
KCLF2403	2403	Active	8/18/2025 12:57:49 PM	Draeger® / Other	75	N=1
KCLF2403	2403	Active	8/22/2025 12:56:12 PM	Draeger® / Other	100	N=1

Attachment C: Daily Logs

7/21/2025	Arrived on site to perform follow up monitoring on Well No. 2403 obtained a Draeger tube and gem reading with valve 100% closed. Additionally, performed Draeger tubing monitoring on surrounding wells in the 250-foot radius and gas readings.
7/22/2025	Arrived on site went directly Well No. 2403 got gas reading and Draeger tubed that well also got readings and Dreger tubes on all wells within the 300-foot radius.
7/23/2025	Obtained additional reading on Well No. 2403 and took a Draeger sample monitored LFG wells. In well field also found Wells in field with low system. Additional removed aggregate away from well casing on LFG Well No. 2403.
8/4/2025	Carbon monoxide (CO) sample on LFG Well No. 2403 and uploaded CO results to Draeger mobile form.
8/6/2025	CO sample on LFG Well No. 2403 and took gas reading uploaded dragger results to mobile forms
8/12/2025	Took additional reading on LFG No. 2403 and did Draeger sampling and upload it to mobile tools. The results were less than a 100 PPM on CO and well is still under positive pressure.

Attachment B: Well KCLF2518 Deviation Letter



Keller Canyon Landfill Company
901 Bailey Road, Pittsburg, CA 94565
c: 619.201.3765 republicservices.com

December 4, 2025

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

Re: 30-Day Title V Report
Special Occurrence Notification for District Regulation 8, Rule 34, Subpart 305
Keller Canyon Landfill, Pittsburg, California
Facility Number A4618

Dear Mr. Gove:

Keller Canyon Landfill Company (KCLC), owner and operator of the Keller Canyon Landfill (Keller, Facility Number A4618), located in Pittsburg, CA, submits this 30-Day Title V Report to the Bay Area Air District (District) per Title V Permit Standard Conditions Section I.F (Monitoring Reports) for a potential subsurface oxidation (SSO) event that was discovered at Keller on November 4, 2025. A previous 10-day Title V Report was submitted on November 14, 2025. As of submittal of this notification, the event has been contained to just KCEW2518.

This notification is being submitted out of an abundance of caution. Pursuant to District Regulation 8-34-305:

"Effective July 1, 2002 and except as provided in Sections 8-34-119 or 120, each wellhead in the gas collection system shall meet the requirements of Sections 8-34-305.1 and 305.2 and either 305.3 or 305.4, unless the operator has discovered the excess and has satisfied all of the requirements of Section 8-34-414; or the operator has received permit conditions containing alternative operating levels:

305.1 Each wellhead shall operate under a vacuum (negative pressure); and

305.2 The landfill gas temperature in each wellhead shall be less than 55° C (131°F); and either

305.3 The nitrogen concentration in each wellhead shall be less than 20% by volume; or

305.4 The oxygen concentration in each wellhead shall be less than 5% by volume"

Note that regulation 8-34-305 is being referenced due to previous explicit requests of the District. However, Keller does not believe that well KCEW2518 was out of compliance with the 8-34-305 requirements once the well was taken offline. The readings collected while the well was offline were to monitor the gas composition and temperature at the well boring, as allowed under District Rule 8-34-117.4.

Background

On November 4, 2025 various SSO indicators, including balance gas of almost 80 percent (%) and methane close to 0%, were detected at well KCEW2518 during field inspection and data review by the site's operations and maintenance (O&M) team, SCS Field Services (SCSFS). Following the initial data discovery, O&M personnel inspected the surrounding area for additional SSO indicators. Additional wells in the area were closed or vacuum adjusted to a minimal setting in an attempt to reduce vacuum at the potential SSO area. All surrounding wells that were closed were returned to at least minimum setting within five days of initially closing the wells. Out of an abundance of caution, immediate actions to protect human and environmental health and safety were taken by O&M personnel, as wells within a 300 and 500-foot radius were checked for carbon monoxide (CO). A map of the potential SSO area is included in **Attachment A**.

As of December 1, 2025, the methane concentration at KCEW2518 remains close to 0%. As such, the well has remained closed but is read to monitor the progression of the potential SSO.

CO readings were taken at wells within a 300 foot radius of KCEW2518 and the results indicated that the potential SSO conditions appeared to be isolated. The CO readings at KCEW2518 results are include in **Table 1**, below. If multiple readings were taken in a day, a straight average was taken.

Table 1. CO Monitoring Results

CO (parts per million [ppm])	Date
750	November 4, 2025
69	November 5, 2025
250	November 6, 2025
10	November 7, 2025
30	November 10, 2025
325	November 14, 2025
10	November 20, 2025
5	November 25, 2025
0	December 1, 2025

Primarily actions were taken for wells within a 300- and 500-foot radius of the potential SSO area, vacuum was decreased (as needed) to prevent the potential of further air intrusion and vacuum influence on Well KCEW2518. O&M personnel took additional precautions and utilized isolation valves at individual wellheads to close off the affected landfill gas (LFG) well and to avoid additional disruption of the gas collection and control system (GCCS). O&M additionally placed soil and betonite around KCEW2518 to assist in the case of any short circuit coming from the well casing. The A-2 and A-3 Flares, and the Ameresco owned engine plant and renewable natural gas (RNG) facility, were not affected during this event due to the use of isolation valves

(at individual wellheads) and no GCCS downtime accrued as a result of this event. No interruption of the landfill GCCS operation, changes in waste acceptances, or damage to existing infrastructure occurred as a result of this event.

Additional well readings and CO sampling results indicate a reduction in CO concentrations near the area of discovery. The most recent wellfield monitoring and CO sampling results are included in **Attachment B**. Based on these monitoring results, KCLC believes the potential SSO was identified proactively and is avoiding further development which could have resulted in potential system damage or health and safety concerns. The O&M team will continue to closely observe the well and surrounding area during future monitoring events.

Preventative Measures Taken

KCLC and O&M personnel routinely review wellfield monitoring data and inspect the overall integrity of the GCCS to ensure optimal operation. The practices described in this letter have been reviewed with site and O&M personnel to ensure KCLC proactively monitors the site for any indicators of potential SSO. Potential indicators of SSO events include, but are not limited to:

- Dramatic localized landfill settlement;
- Charred or cracked surface cover;
- Stressed or dead vegetation in an area that is otherwise properly vegetated;
- Smoke or smoky odor emanating from the landfill surface or wellhead;
- Drastic or unusual increase in flowing gas temperature;
- Significant drop in methane content in the gas;
- Abnormal discoloration of wellhead/riser assembly;
- Abnormally high CO and ammonia (NH₃) concentration in LFG; and
- Deformed riser pipes.

Note, not all symptoms need to be present to confirm an SSO event is occurring but any one symptom alone is also not sufficient to assume an SSO. KCLC and O&M personnel followed the standard practices at the KCEW2518 event to investigate the area for potential SSO event.

Additionally, all higher operating value (HOV) wells at the landfill are closely monitored routinely. If temperature increases or comes close to the HOV limit, additional monitoring is conducted. KCLC will continue to conduct SSO investigations when any wellhead temperature exceeds 145 degrees Fahrenheit and measure CO concentrations using Draeger tubes and wellhead temperatures until results indicates a safe level (CO concentrations under 100 ppmv with temperatures under 140 degrees Fahrenheit).

O&M personnel will continue to monitor the area and perform additional cover inspections and maintenance to any surface penetrations and/or cracking. Documentation of additional corrective actions completed as of the date of this submittal are provided in **Attachment C**.

Conclusion

KCLC is committed to ensuring the prevention of future potential SSO events and prioritizes quick response following detection of any potential SSO indicators. KCLC is submitting this 30-Day Title V Report out of an abundance of caution pursuant to Title V Permit Standard Conditions Section I.F (Monitoring Reports). KCLC has maintained full transparency with the District in providing site records, as well as further clarification on the event. KCLC is committed to operating its systems in compliance with all applicable regulations and assuring the health and safety of its personnel.

If you have any questions, please do not hesitate to contact Maria Bowen at (619) 455-9518 or mbowen@SCSEngineers.com or Alisha McCutcheon at AMcCutcheon@republicservices.com.

Sincerely,



Alisha McCutcheon
Environmental Manager
Keller Canyon Landfill

cc: Antonia Gunner, KCLC
Lily Law, Bay Area Air District Maria
Bowen, SCS Engineers
Sean Bass, SCS Field Services

Enclosure: Attachment A: Map of Potential SSO Area
Attachment B: Wellfield Monitoring Data
Attachment C: Daily Logs

Attachment A: Map of Potential SSO Area

Attachment B: Wellfield Monitoring Data

Point ID/Name	Record Date Time	CH4 (% by vol)	CO2 (% by vol)	O2 (% by vol)	Bal Gas (% by vol)	Init Temp (F)	Adj Temp (F)	Init Static Pressure ("H2O)	Adj Static Pressure ("H2O)	Init Flow (scfm)	Adj Flow (scfm)	System Pressure ("H2O)	CO (ppm)
KCEW2518	11/4/2025 11:52 AM												750.00
KCEW2518	11/4/2025 11:58 AM	16.40	24.50	1.80	57.30	139.70	138.80	-14.72	-14.72	20.80	20.80	-40.65	
KCEW2518	11/4/2025 12:00 PM	15.70	24.40	1.80	58.10	138.00	139.30	-14.64	-14.64	20.90	20.90	-40.45	
KCEW2518	11/4/2025 02:13 PM	1.80	2.80	16.50	78.90	107.30	106.60	-12.03	-12.02	2.70	2.60	-32.09	
KCEW2518	11/4/2025 03:02 PM	0.10	0.30	21.20	78.40	74.50	74.50	-11.71	-11.74	1.90	2.00	-33.64	
KCEW2518	11/5/2025 11:29 AM	0.00	0.50	20.70	78.80	68.80	68.90	-4.39	-4.39	0.00	0.30	-12.29	
KCEW2518	11/5/2025 04:50 PM	2.20	2.10	20.40	75.30	60.10	59.10	-9.50	-7.47	0.00	0.00	-20.80	69.00
KCEW2518	11/6/2025 02:11 PM												250.00
KCEW2518	11/7/2025 08:45 AM												20.00
KCEW2518	11/7/2025 10:00 AM	4.50	6.20	16.10	73.20	65.90	66.00	0.19	0.19	0.60	0.60	-42.19	0.00
KCEW2518	11/10/2025 11:38 AM												30.00
KCEW2518	11/10/2025 11:45 AM	0.00	0.20	19.50	80.30	78.30	78.40	-11.58	-11.59	0.00	0.00	-37.56	
KCEW2518	11/14/2025 09:39 AM	0.10	0.00	19.50	80.40	58.50	62.40	-13.28	-13.34	0.00	0.81	-44.79	
KCEW2518	11/14/2025 09:42 AM	17.00	21.90	4.70	56.40	67.10	68.50	-13.60	-13.60	0.81	0.80	-44.35	
KCEW2518	11/14/2025 02:42 PM												325.00
KCEW2518	11/20/2025 03:18 PM												10.00
KCEW2518	11/20/2025 03:20 PM	0.10	0.40	22.00	77.50	55.90	55.90	-12.14	-12.14	0.00	0.00	-43.56	
KCEW2518	11/21/2025 12:16 PM	0.00	0.10	20.70	79.20	65.70	65.70	-13.09	-13.13	0.00	0.00	-43.48	
KCEW2518	11/21/2025 12:18 PM	0.00	0.10	20.80	79.10	65.50	65.50	-13.13	-13.13	0.00	0.00	-43.52	
KCEW2518	11/25/2025 09:53 AM												5.00
KCEW2518	11/25/2025 09:58 AM	0.00	0.20	20.90	78.90	47.60	47.60	-13.64	-13.66	0.10	0.10	-44.16	
KCEW2518	12/1/2025 01:53 PM												0.00
KCEW2518	12/1/2025 01:56 PM	0.10	1.30	20.90	77.70	45.40	45.40	-13.06	-13.06	0.10	0.10	-42.37	

Attachment C: Daily Logs

Subsurface Oxidation Event				Report Date:11/13/2025	
Event Information					
Site Name		Keller Canyon Landfill			
Point ID		53			
Event Name		sso at 2518			
Start Date		End Date		Duration (Days)	
11/4/2025				10	
				Status	
				Open	
Reported By			Reported On		
Will Spurgeon			11/4/2025		
Closest Active Well			# Wells in 300 ft Point Group		# Wells in 500 ft Point Group
KCEW2518			13		31
General Comments					
Date	User	Comment			
11/4/2025	Will Spurgeon	Location of SSO event at , at nearest well 2518			
General Photos					
 Date: 11/4/2025 By: Will Spurgeon					
Root Cause Comments					
Date	User	Comment			
Root Cause Photos					