



Keller Canyon Landfill 901 Bailey Road Pittsburg, CA 94565
o 925.232.2999 republicservices.com

TV Tracking # 984 (Semi-Annual)

**1. RECEIVED IN
ENFORCEMENT: 09/30/2024**

September 30, 2024

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

Director of the Air Division, USEPA Region IX
75 Hawthorne Street
San Francisco, CA 94105
Attn: Air-3

Subject: Combined NESHAP Report, 8-34 Semi-Annual Report, 40 CFR Subpart AAA Semi-Annual Report, SSM Plan Report, Title V Semi-Annual Monitoring Report and Title V Annual Compliance Certification
Keller Canyon Landfill, Pittsburg, California (Title V Facility No. A4618)

Dear Sir or Madam:

Keller Canyon Landfill Company, LLC is pleased to submit the enclosed combined National Emission Standards for Hazardous Air Pollutants (NESHAP) report, Bay Area Air Quality Management District (BAAQMD), Regulation 8, Rule 34 Semi-Annual Report; Semi-Annual Startup, Shutdown and Malfunction (SSM) Plan Report; Title V Semi-Annual Monitoring Report; and Title V Annual Compliance Certification (ACC) to the BAAQMD and the U.S. Environmental Protection Agency (EPA) Region IX for the Keller Canyon Landfill (Keller).

The NESHAP Report, Title V Semi-Annual Monitoring Report, BAAQMD Rule 8-34 Semi-Annual Report, and the SSM Plan Report cover the period from March 1, 2024 through August 31, 2024. The Title V ACC Report covers the period from September 1, 2023 through August 31, 2024.

The Title V report meets the requirements specified in the Title V permit, BAAQMD guidance on Title V report submittals, and Regulation 2, Rule 6. The Rule 8-34 report includes the information required by BAAQMD Rule 8-34-411 and also satisfies the requirements under the New Source Performance Standards (NSPS) for municipal solid waste landfills (40 Code of Federal Regulation [CFR] Part 60, Subpart WWW and applicable sections of 40 CFR Part 62, Subpart OOO which became effective on July 21, 2021), including 40 CFR 60.757(f)/40 CFR 62.16724(h). The Semi-Annual SSM Plan Report satisfies the requirements under the NESHAP rule for semi-annual reporting of SSM Plan implementation including 40 CFR 63.10(d)(S). The Title V reports and the SSM Plan report each includes a certification by the responsible official for Keller.

If you have any questions regarding this submittal, please do not hesitate to reach out to Antonia Gunner at (619) 201-3764 or agunner@republicservices.com or Maria Bowen at (619) 455-9518 or mbowen@scsengineers.com.

Sincerely,

Josh Mills
General Manager
Keller Canyon Landfill

cc: Antonia Gunner, Keller
Maria Bowen, SCS Engineers
Hannah Morse, SCS Engineers

KELLER CANYON LANDIFLL

TITLE V SEMI-ANNUAL MONITORING REPORT

SITE: KELLER CANYON LANDFILL	FACILITY ID#: A4618
REPORTING PERIOD: <i>from</i> 03/01/2024 <i>through</i> 08/31/2024	

CERTIFICATION:

I declare, under penalty of perjury under the laws of the state of California, that, based on information and belief formed after reasonable inquiry, all information provided in this reporting package is true, accurate, and addresses all deviations during the reporting period:



Signature of Responsible Official

09/30/2024

Date

Josh Mills

Name of Responsible Official (please print)

General Manager

Title of Responsible Official (please print)

Mail to:

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

KELLER CANYON LANDIFLL

TITLE V SEMI-ANNUAL MONITORING REPORT

SITE: KELLER CANYON LANDFILL	FACILITY ID#: A4618
REPORTING PERIOD: <i>from</i> 03/01/2024 <i>through</i> 08/31/2024	

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:

ATC under application number 28642 for the A-3 flare was extended and the Temporary PTO was issued in November.

KELLER CANYON LANDFILL

TITLE V SEMI-ANNUAL MONITORING REPORT

Keller Canyon Landfill	Facility ID#: A4618
Monitored Unit: S-1 KELLER CANYON LANDFILL, A-1 AND A-2 LL GAS FLARE; S-4 WASTE AND COVER MATERIAL DUMPING; S-5 ATING, BULLDOZING, AND COMPACTING ACTIVITIES	Reporting Period: from 03/01/2024 through 08/31/2024

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
Collection System Installation Dates	BAAQMD 8-34-501.7 and 501.8 and BAAQMD Condition # 17309, Part 16d-h	Records	Periodic / On event basis	BAAQMD 8-34-304.1	For Inactive/Closed Areas: collection system components must be installed and operating by 2 years + 60 days after initial waste placement	Continuous	N/A
Collection System Installation Dates	BAAQMD 8-34-501.7 and 501.8 and BAAQMD Condition # 17309, Part 16d-h	Records	Periodic / On event basis	BAAQMD 8-34-304.2 and BAAQMD 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
Collection System Installation Dates	BAAQMD 8-34-501.7 and 501.8 and BAAQMD Condition # 17309, Part 16d-h	Records	Periodic / On event basis	BAAQMD 8-34-304.3 and BAAQMD 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

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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	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 operating by 2 years + 60 days after initial waste placement	Continuous	N/A
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	BAAQMD 8-34-501.10 and 508 and BAAQMD Condition # 17309, Parts 27 and 28	Gas Flow Meter and Recorder (every 15 minutes)	Continuous	BAAQMD 8-34-301 and 301.1 and BAAQMD Condition # 17309, Parts 19, 20, 21	Landfill gas collection system shall operate continuously, all collected gases shall be vented to a properly operating control system, and control system shall operate continuously	Intermittent	On May 21, 2024 gas collection system downtime occurred due to Pacific Gas and Energy (PG&E) power surge. For additional information, including corrective actions taken, please refer to the 10-Day and 30-Day Deviation

KELLER CANYON LANDFILL

TITLE V SEMI-ANNUAL MONITORING REPORT

Keller Canyon Landfill	Facility ID#: A4618
Monitored Unit: S-1 KELLER CANYON LANDFILL, A-1 AND A-2 S-3 WASTE AND COVER MATERIAL DUMPING; S-4 WASTE AND COVER MATERIAL DUMPING; S-5 WASTE AND COVER MATERIAL DUMPING, BULLDOZING, AND COMPACTING ACTIVITIES	Reporting Period: from 03/01/2024 through 08/31/2024

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
							Letter that was submitted to the BAAQMD on May 31, 2024.
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	Intermittent	On May 21, 2024 gas collection system downtime occurred due to PG&E power surge. For additional information, including corrective actions taken, please refer to the 10-Day and 30-Day Deviation Letter that was submitted to the BAAQMD on May 31, 2024.
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, and operate control system at all times so that no gas leak exceed 500 ppmv as methane	Continuous	N/A

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Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
Collection and Control Systems Shutdown Time	BAAQMD 8-34-501.1 and 501.2	Operating Records (all occurrences and duration of each)	Periodic / Daily	BAAQMD 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 Systems Shutdown Time	CARB LMR 95470(a)(1)(A-B)	Operating Records (all occurrences and duration of each)	Periodic/ On event basis	CARB LMR 95464(a)(1)(D) and 95464(e)	For Collection System: < 5 days per event and For Control System: < 1 hour per event	Continuous	N/A
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

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Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
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	BAAQMD 1-523.4	Operating Records for All Parametric Monitors	Periodic / Daily	BAAQMD 1-523.2	< 15 consecutive days per incident and < 30 calendar days per 12 month period	Continuous	N/A
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	BAAQMD 8-34-414, 501.9 and 505.1	Monthly Inspection and Records	Periodic / Monthly	BAAQMD 8-34-305.1	< 0 psig (Applies to all wells that are connected to the vacuum system)	Continuous	N/A
Wellhead Pressure	40 CFR 60.755(a)(3), 60.756(a)(1), and 60.758(c) and (e)	Monthly Inspection and Records	Periodic / Monthly	40 CFR 60.753(b)	< 0 psig (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
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)	Continuous	N/A
Temperature of Gas at Wellhead	BAAQMD 8-34-414, 501.9 and 505.2	Monthly Inspection and Records	Periodic / Monthly	BAAQMD 8-34-305.2	< 55 °C (Applies to all wells that are connected to the vacuum system)	Continuous	N/A
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	BAAQMD 8-34-414, 501.9, 505.2, and BAAQMD Condition #17309, Part 19	Monthly or more frequent Inspection and Records	Periodic / Monthly, bimonthly, or weekly	BAAQMD 8-34-505 and BAAQMD Condition 17309, Part 19	<150 degrees F (Alternative wellhead temperature limit that applies only to wells specified in BAAQMD Condition #17309, Part 19(b)(i))	Continuous	N/A

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Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
Gas Concentrations in LFG at Wellhead	BAAQMD 8-34-414, 501.9 and 505.3 or 505.4	Monthly Inspection and Records	Periodic / Monthly	BAAQMD 8-34-305.3 or 305.4	N ₂ < 20% (by volume, dry basis) OR O ₂ < 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 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)	N ₂ < 20% OR O ₂ < 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	BAAQMD Condition # 17309, Part 19b(ii) and iii)	Monthly Inspection and Records	Periodic / Monthly	BAAQMD Condition # 17309, Part 19b(i)	O ₂ < 15% (Applies to wells identified in Condition # 17309, Part 19b(i) 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
Well Shutdown Limits	BAAQMD 8-34-116.5 and 501.1	Records	Periodic / Daily	BAAQMD 8-34-116.2	No more than 5 wells at a time or 10% of total collection system, whichever is less	Continuous	N/A
Well Shutdown Limits	BAAQMD 8-34-116.5 and 501.1	Records	Periodic / Daily	BAAQMD 8-34-116.3	< 24 hours per well	Continuous	N/A
Well Shutdown Limits	BAAQMD 8-34-117.6 and 501.1	Records	Periodic / Daily	BAAQMD 8-34-117.4	No more than 5 wells at a time or 10% of total collection system, whichever is less	Continuous	N/A
Well Shutdown Limits	BAAQMD 8-34-117.6 and 501.1	Records	Periodic / Daily	BAAQMD 8-34-117.5	< 24 hours per well or < 5 days per well for component replacements	Continuous	N/A

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Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
Well Shutdown Limits	BAAQMD Condition # 17309, Part 19c(v)	Records	Periodic / Daily	BAAQMD 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 Compounds Plus Methane)	BAAQMD 8-34-501.6 and 503 and BAAQMD Condition # 17309, Part 19c(iv and v)	Quarterly Inspection of collection and control system components with OVA, Additional Inspection of Temporarily Disconnected	Periodic / Quarterly	BAAQMD 8-34-301.2 and BAAQMD Condition # 17309, Part 19c(iv)	Component Leak Limit: < 1000 ppmv as methane	Intermittent	During Second quarter 2024 surface and component leak monitoring, a leak greater than 1,000 ppmv was detected on April 16, 2024 at the flame arrestor. This component leak was documented in

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Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
		Components and Records					the second quarter Surface Emissions Monitoring report and remediated on April 23, 2024.
TOC	BAAQMD 8-34-415, 416, 501.6, 506 and 510	Monthly Visual Inspection of Cover, Quarterly Inspection with OVA of Surface, Various Reinspection Times for Leaking Areas, and Records	Periodic / Monthly, Quarterly, and on an Event Basis	BAAQMD 8-34-303	Surface Leak Limit: < 500 ppmv as methane at 2 inches above surface	Continuous	N/A

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Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
TOC	Condition # 17309, Part 19b(iv-vi)	Monthly Inspection with OVA of Surface (3 points within 15 m of well), Various Reinspection Times for Leaking Areas, and Records	Periodic / Monthly	BAAQMD 8-34-303 and BAAQMD Condition # 17309, Part 19b(iv)	Surface Leak Limit: < 500 ppmv 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)	Continuous	N/A
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 Reinspection Times for Leaking Areas, and Records	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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Keller Canyon Landfill	Facility ID#: A4618
Monitored Unit: S-1 KELLER CANYON LANDFILL, A-1 AND A-2 WELL GAS FLARE; S-4 WASTE AND COVER MATERIAL DUMPING; S-5 GRAVITY SEPARATION, BULLDOZING, AND COMPACTING ACTIVITIES	Reporting Period: from 03/01/2024 through 08/31/2024

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
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)	BAAQMD 8-34-412 and 8-34-501.4 And BAAQMD Condition # 17309, Parts 30 and 31	Initial and Annual Source Tests	Periodic / Annual	BAAQMD 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 < 20 ppmvd @ 3% O ₂ , expressed as hexane	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
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)	BAAQMD 8-34-501.3 and 507, and BAAQMD Condition # 17309, Part 22	Temperature Sensor and Recorder (continuous)	Continuous	BAAQMD 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

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Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
Temperature of Combustion Zone (CT)	40 CFR 60.756(b)(1) and 60.758 (b)(2)(i)	Temperature Sensor and Recorder (measured every 15 minutes and averaged over performance test time period and 3-hours)	Continuous	40 CFR 60.758 (c)(1)(i)	For A-1 Flare: CT > 1504 °F (3-hour average) from (CT > CTPF – 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	Continuous	N/A
POC (Precursor Organic Compounds)	BAAQMD Condition # 17309, Part 33	Calculation Procedure (once every 5 years)	Periodic / On event basis	BAAQMD Condition # 17309, Part 33	< 112.828 tons per year (fugitive POC from all landfill operations)	Continuous	N/A

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Monitored Unit: S-1 KELLER CANYON LANDFILL, A-1 AND A-2 S-3 LANDFILL GAS FLARE; S-4 WASTE AND COVER MATERIAL DUMPING; S-5 LANDFILL GRADING, BULLDOZING, AND COMPACTING ACTIVITIES	Reporting Period: from 03/01/2024 through 08/31/2024

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
Total Carbon	BAAQMD Condition # 17309, Part 36a-c	Records	Periodic / On event basis	BAAQMD 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	BAAQMD Condition # 17309, Parts 36a-c and 37m	Records	Periodic / On event basis	BAAQMD 8-40-116.1	< 1 cubic yard per project	Continuous	N/A
Amount of Contaminated Soil Aerated or Used as Cover	BAAQMD 8-40-116.2 and BAAQMD Condition # 17309, Parts 36a-c and 37m	Records	Periodic / On event basis	BAAQMD 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
Amount of Accidental Spillage	None	N/A	None	BAAQMD 8-40-117	Soil Contaminated by Accidental Spillage of < 5 gallons of Liquid Organic Compounds	Continuous	N/A

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TITLE V SEMI-ANNUAL MONITORING REPORT

Keller Canyon Landfill	Facility ID#: A4618
Monitored Unit: S-1 KELLER CANYON LANDFILL, A-1 AND A-2 LL GAS FLARE; S-4 WASTE AND COVER MATERIAL DUMPING; S-5 ATING, BULLDOZING, AND COMPACTING ACTIVITIES	Reporting Period: from 03/01/2024 through 08/31/2024

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
Total Aeration Project Emissions	BAAQMD Condition # 17309, Part 37m	Records	Periodic / On event basis	BAAQMD 8-40-118	< 150 pounds per project and toxic air contaminant emissions per year < BAAQMD Table 2-5-1 limits	Continuous	N/A
Amount of Contaminated Soil Aerated or Used as Cover	BAAQMD Condition # 17309, Parts 36a-c and 37m	Calculations and Records	Periodic / On event basis	BAAQMD 8-40-301 and BAAQMD Condition # 17309, Part 37k	Prohibited for Soil with Organic Content > 50 ppmw unless exempt per BAAQMD 8-40-116, 117, or 118	Continuous	N/A
Contaminated Soil Handling	BAAQMD Condition # 17309, Part 37m	Records	Periodic / On event basis	BAAQMD Condition # 17309, Part 37e	Limited to 2 on-site transfers per lot of contaminated soil	Continuous	N/A
Contaminated Soil On-Site Storage Time	BAAQMD Condition # 17309, Part 37m	Records	Periodic / On event basis	BAAQMD 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

KELLER CANYON LANDFILL

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Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
SO ₂	None	N/A	None	BAAQMD 9-1-301	Property Line Ground Level Limits: < 0.5 ppm for 3 minutes, < 0.25 ppm for 60 minutes, and <0.05 ppm for 24 hours	Continuous	N/A
SO ₂	BAAQMD Condition # 17309, Parts 31 and 34	Sulfur Analysis of Landfill Gas	Periodic / Quarterly	BAAQMD 9-1-302	In Exhaust Gases From Flares: < 300 ppm (dry)	Continuous	N/A
H ₂ S	None	N/A	None	BAAQMD 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	BAAQMD Condition # 17309, Parts 31 and 34	Sulfur Analysis of Landfill Gas	Periodic / Quarterly	BAAQMD Condition # 17309, Part 34	In Collected Landfill Gas: < 300 ppmv (dry)	Continuous	N/A
Opacity	BAAQMD Condition # 17309, Part 16j-l	Records of Water and Dust Suppressant Application	Periodic / Quarterly	BAAQMD 6-1-301 and SIP 6-301	For Landfill Operations: < Ringelmann No. 1 for 3 minutes in any hour	Continuous	N/A

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Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
Opacity	BAAQMD 8-34-501.3 and 507, and BAAQMD Condition # 17309, Part 22	Temperature Sensor and Recorder (continuous)	Continuous	BAAQMD 6-1-301 and SIP 6-301	For Flares: < Ringelmann No. 1 for 3 minutes in any hour	Continuous	N/A
FP	None	N/A	None	BAAQMD 6-1-310 and SIP 6-310	For Flares: < 0.15 grains/dscf	Continuous	N/A
Operating Time	BAAQMD Condition # 17309, Parts 16a and 16i	Records of Waste Received and Truck Traffic	Periodic / Daily	BAAQMD Condition # 17309, Part 1	Monday through Friday	Continuous	N/A
Waste Received	BAAQMD Condition # 17309, Part 16a	Records of Waste Received	Periodic / Daily	BAAQMD Condition # 17309, Part 2a	< 3500 tons per day	Continuous	N/A
Cumulative Waste In-Place	BAAQMD Condition # 17309, Part 16a	Records of Waste Placed in Landfills	Periodic / Daily	BAAQMD Condition # 17309, Part 2b	< 38.4 million tons (<34.8 million Mg)	Continuous	N/A
Design Capacity	BAAQMD Condition # 17309, Parts 16a, 36a, and 37m	Records of Material Placed in Landfill	Periodic / Daily	BAAQMD Condition # 17309, Part 2c	< 75 million yd3 (< 57.3 million m3) of all wastes and cover materials (excluding final cover)	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
Unpaved Road Length	BAAQMD Condition # 17309, Part 12	Site Maps	Periodic / On event basis	BAAQMD Condition # 17309, Part 5a	< 3000 feet from cover stockpile to working face midpoint	Continuous	N/A
Unpaved Road Length	BAAQMD Condition # 17309, Part 12	Site Maps	Periodic / On event basis	BAAQMD Condition # 17309, Part 5b	< 400 feet from end of main access road to working face midpoint	Continuous	N/A
Unpaved Road Length	BAAQMD Condition # 17309, Part 12	Site Maps	Periodic / On event basis	BAAQMD 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	BAAQMD Condition # 17309, Part 12	Site Maps	Periodic / On event basis	BAAQMD Condition # 17309, Part 5d	< 1400 feet of fire access roads	Continuous	N/A
Vehicle Speed	BAAQMD Condition # 17309, Part 6	Posted Signs and Enforcement if Necessary	Periodic / On event basis	BAAQMD Condition # 17309, Part 6	< 10 mph on unpaved roads and < 25 mph on fire access roads	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
Dust Suppressant Application Rate for Unpaved Roads	BAAQMD Condition # 17309, Part 16k	Records	Periodic / Daily	BAAQMD 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	BAAQMD Condition # 17309, Part 16i-j	Records	Periodic / Daily	BAAQMD Condition # 17309, Parts 8 and 10	Once every fifth heavy duty vehicle and more often as necessary	Continuous	N/A
Water Application Rate for Active face and Soil Areas	BAAQMD Condition # 17309, Part 16 l	Records	Periodic / Daily	BAAQMD Condition # 17309, Part 13	> 0.5 gallons per square yard twice per day on all dry days	Continuous	N/A
Truck Traffic Volume	BAAQMD Condition # 17309, Part 16i	Records	Periodic / Daily	BAAQMD Condition # 17309, Part 11a	< 175 transfer truck trips per annual average day	Continuous	N/A
Truck Traffic Volume	BAAQMD Condition # 17309, Part 16i	Records	Periodic / Daily	BAAQMD Condition # 17309, Part 11b	< 4 leachate truck trips per annual average day	Continuous	N/A

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Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
Truck Traffic Volume	BAAQMD Condition # 17309, Part 16i	Records	Periodic / Daily	BAAQMD Condition # 17309, Part 11c	< 45 scraper trips per annual average day	Continuous	N/A
Truck Traffic Trip Length	BAAQMD Condition # 17309, Part 12	Site Maps and Records	Periodic / On event basis	BAAQMD Condition # 17309, Part 12a	< 7800 feet for transfer trucks	Continuous	N/A
Truck Traffic Trip Length	BAAQMD Condition # 17309, Part 12	Site Maps and Records	Periodic / On event basis	BAAQMD Condition # 17309, Part 12b	< 3600 feet for leachate trucks	Continuous	N/A
Truck Traffic Trip Length	BAAQMD Condition # 17309, Part 12	Site Maps and Records	Periodic / On event basis	BAAQMD Condition # 17309, Part 12c	< 3000 feet for scrapers	Continuous	N/A
NOx	BAAQMD Condition # 17309, Part 30	Annual Source Test	Periodic / Annual	BAAQMD 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	BAAQMD Condition # 17309, Part 30	Annual Source Test	Periodic / Annual	BAAQMD 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	BAAQMD Condition # 17309, Part 31	Annual Laboratory Analysis	Periodic / Annual	BAAQMD Condition # 17309, Part 32	Concentration in Landfill Gas: < 500 ppbv or Fugitive Emissions: < 60 pounds/year	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
Benzene	BAAQMD Condition # 17309, Part 31	Annual Laboratory Analysis	Periodic / Annual	BAAQMD Condition # 17309, Part 32	Concentration in Landfill Gas: < 20,000 ppbv or Fugitive Emissions: < 3557 pounds/year	Continuous	N/A
Carbon Tetrachloride	BAAQMD Condition # 17309, Part 31	Annual Laboratory Analysis	Periodic / Annual	BAAQMD Condition # 17309, Part 32	Concentration in Landfill Gas: < 100 ppbv or Fugitive Emissions: < 35 pounds/year	Continuous	N/A
Chloroform	BAAQMD Condition # 17309, Part 31	Annual Laboratory Analysis	Periodic / Annual	BAAQMD Condition # 17309, Part 32	Concentration in Landfill Gas: < 100 ppbv or Fugitive Emissions: < 27 pounds/year	Continuous	N/A
Ethylene Dibromide	BAAQMD Condition # 17309, Part 31	Annual Laboratory Analysis	Periodic / Annual	BAAQMD Condition # 17309, Part 32	Concentration in Landfill Gas: < 100 ppbv or Fugitive Emissions: < 40 pounds/year	Continuous	N/A
Ethylene Dichloride	BAAQMD Condition # 17309, Part 31	Annual Laboratory Analysis	Periodic / Annual	BAAQMD Condition # 17309, Part 32	Concentration in Landfill Gas: < 750 ppbv or Fugitive Emissions: < 169 pounds/year	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
Methylene Chloride	BAAQMD Condition # 17309, Part 31	Annual Laboratory Analysis	Periodic / Annual	BAAQMD Condition # 17309, Part 32	Concentration in Landfill Gas: < 7,600 ppbv or Fugitive Emissions: < 1470 pounds/year	Continuous	N/A
Perchloroethylene	BAAQMD Condition # 17309, Part 31	Annual Laboratory Analysis	Periodic / Annual	BAAQMD Condition # 17309, Part 32	Concentration in Landfill Gas: < 3,300 ppbv or Fugitive Emissions: < 1246 pounds/year	Continuous	N/A
Trichloroethylene	BAAQMD Condition # 17309, Part 31	Annual Laboratory Analysis	Periodic / Annual	BAAQMD Condition # 17309, Part 32	Concentration in Landfill Gas: < 1,500 ppbv or Fugitive Emissions: < 449 pounds/year	Continuous	N/A
Vinyl Chloride	BAAQMD Condition # 17309, Part 31	Annual Laboratory Analysis	Periodic / Annual	BAAQMD Condition # 17309, Part 32	Concentration in Landfill Gas: < 1,700 ppbv or Fugitive Emissions: < 242 pounds/year	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
Heat Input	BAAQMD Condition # 17309, Part 35	Records	Periodic / Monthly	BAAQMD 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
Trackout onto Paved Roadways	BAAQMD 6-6-501, BAAQMD Permit Condition #17309, Part 38	Records	Periodic / Daily	BAAQMD 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	BAAQMD 6-6-501, BAAQMD Permit Condition #17309, Part 38	Records	Periodic / Daily	BAAQMD 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

Keller Canyon Landfill	Facility ID#: A4618
Monitored Unit: S-3 YARD AND GREEN WASTE STOCKPILES	Reporting Period: from 03/01/2024 through 08/31/2024

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

