

2 COMBINED MONITORING REPORT

In accordance with Title V Permit Standard Condition 1.F, BAAQMD Rule 8-34-411 and §60.757(f) in the NSPS, this report is a Combined Semi-Annual Title V Report and Partial 8-34 Annual Report that is required to be submitted by Newby Island. The report contains monitoring data for the operation of the landfill gas collection and control system (GCCS). The operational records have been reviewed and summarized. The timeframe included in this report is August 1, 2016 through January 31, 2017. The following table lists the rules and regulations that are required to be included in this Combined Report.

TABLE 2-1 - COMBINED REPORT REQUIREMENTS

Rule	Requirement	Location in Report
8-34-501.1 §60.757(f)(4)	All collection system downtime, including individual well shutdown times and the reason for the shutdown.	Section 2.1, Appendices C & D
8-34-501.2 §60.757(f)(3)	All emission control system downtime and the reason for the shutdown.	Section 2.2, Appendix D & E
8-34-501.3, 8-34-507, §60.757(f)(1)	Continuous temperature for all operating flares and any enclosed combustor subject to Section 8-34-507.	Section 2.3, Appendix F
8-34-501.4, 8-34-505, 8-34-510	Monitoring and Testing performed to satisfy any of the requirements of this rule.	Section 2.4 & 2.10 Appendices F, G & J
8-34-501.5	Monthly landfill gas flow (LFG) rates and well concentration readings for facilities subject to 8-34-404.	Section 2.5, 2.11 Appendix L
8-34-501.6, 8-34-503, 8-34-506 §60.757(f)(5)	For operations subject to Section 8-34-503 and 8-34-506, records of all monitoring dates, leaks in excess of the limits in Section 8-34-301.2 or 8-34-303 that are discovered by the operator, including the location of the leak, leak concentration in parts per million by volume (ppmv), date of discovery, the action taken to repair the leak, date of the repair, date of any required re-monitoring, and the re-monitored concentration in ppmv.	Section 2.6 & 2.7, Appendices G & H
8-34-501.7	Annual waste acceptance rate and current amount of waste in-place.	Section 2.8
8-34-501.8	Records of the nature, location, amount, and date of deposition of non-degradable wastes, for any landfill areas excluded from the collection system requirement as documented in the GCCS Design Plan.	Section 2.9
8-34-501.9, 8-34-505, §60.757(f)(1)	For operations subject to Section 8-34-505, records of all monitoring dates and any excesses of the limits stated in Section 8-34-305 that are discovered by the operator, including well identification number, the measured excess, the action taken to repair the excess, and the date of repair.	Section 2.10 Appendices J & K
8-34-501.10, 8-34-508, §60.757(f)(1)	Continuous gas flow rate records for any site subject to Section 8-34-508.	Section 2.11, Appendices E and L
8-34-501.11, 8-34-509	For operations subject to Section 8-34-509, records or key emission control system operating parameters.	Section 2.2.2
8-34-501.12	The records required above shall be made available and retained for a period of five years.	Section 1.2
9-8-304	Emission Limits - Compression-Ignited Engines.	Section 2.14

Rule	Requirement	Location in Report
§60.757(f)(2)	Description and duration of all periods when the gas stream is diverted from the control device through a bypass line or the indication of bypass flow as specified under §60.756.	Section 2.2.1
§60.757(f)(6)	The date of installation and the location of each well or collection system expansion added pursuant to paragraphs (a)(3), (b), (c)(4) of §60.755.	Section 2.12, Appendices A & C
§60.10 (d)(5)(i)	Startup, Shutdown, Malfunction Events	Section 4.0, Appendices C & D

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

Appendix A contains a current map of Newby Island's existing GCCS. Section 2.1.1 includes the GCCS downtime for the reporting period. The information contained in Section 2.1.2 includes the number of individual well shutdowns. Refer to Appendix C for the shutdown times and the reason for the shutdown.

2.1.1 Collection System Downtime

During the period covered in this report, the GCCS was not shut down for more than five days on any one occasion. The downtime for the reporting period of August 1, 2016 through January 31, 2017 was 67.82 hours. The total downtime for the 2016 calendar year was 125.93 hours, and the total downtime for the 2017 calendar year to date is 17.47 hours out of an allowable 240 hours per year. Per direction from Newby Island Operations personnel, the GCCS is not shutdown unless Cornerstone is notified by AEG technicians. GCCS non-operational hours are tracked and recorded using the Yokogawa Continuous Control module.

Appendix D contains the A-2 and A-3 Flare Downtime Reports which list dates, times, and lengths of shutdowns for the reporting period and year-to-date. Appendix E contains the GCCS Downtime.

2.1.2 Well Start-Up & Disconnection Log

There were 14 wellfield SSM events that occurred during the reporting period. There were four vertical wells decommissioned during the reporting period. See Appendix C, Wellfield SSM Log for details of well disconnection and reconnection events. Decommissioning Notification Letters were submitted to the BAAQMD and are included in Appendix B.

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

The emission control system consists of three flares (A-1, A-2 and A-3), which began operation in 1997, 2007, and 2015, respectively. The A-1 Callidus Flare was decommissioned on March 4, 2015. On May 29, 2015, Republic sent a notification to BAAQMD that the A-1 Callidus Flare had been permanently taken out of operation. The control system was not bypassed at any time during the reporting period. Raw LFG was not emitted during the reporting period. The SSM Logs for the A-2 and A-3 Flares are located in Appendix D.

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

Title 40 CFR §60.757(f)(2) is not applicable at Newby Island because a bypass line has not been installed. LFG cannot be diverted from the control equipment.

2.2.2 Key Emission Control Operating Parameters (BAAQMD 8-34-501.11 & 8-34-509)

BAAQMD Regulation 8-34-501.11 and 8-34-509 are not applicable to the A-1, A-2, and A-3 Flares because the A-1, A-2, and A-3 Flares are subject to continuous temperature monitoring as required in BAAQMD Regulation 8-34-507 and §60.757(f)(1). The A-1 Callidus Flare was decommissioned on March 4, 2015. On May 29, 2015, Republic sent a notification to BAAQMD that the A-1 Callidus Flare had been permanently taken out of operation.

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

The combustion zone temperatures of the flares are monitored with Thermo-Electric Thermocouples. The temperature is displayed with a Yokogawa digital recorder, which is downloaded and archived. There were no temperature deviations during the reporting period. Appendix F contains the Flare Temperature Deviation/Inoperative Monitor/Missing Data Report for August 1, 2016 through January 31, 2017.

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

The cover integrity monitoring was performed on the following dates:

- August 31, 2016;
- September 28, 2016;
- October 26, 2016;

- November 29, 2016;
- December 28, 2016; and
- January 31, 2017.

The Monthly Cover Integrity Monitoring Logs are included in Appendix G.

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

Newby Island does not operate under BAAQMD Regulation 8-34-404 (Less Than Continuous Operation) and, therefore, is not required to submit monthly LFG flow rates.

2.6 Surface Emissions Monitoring ((BAAQMD 8-34-501.6, 8-34-506, §60.757(f)(5) & California Air Resources Board Assembly Bill 32 Methane Control Measure (CARB AB-32 LF MCM))

Quarterly Surface Emissions Monitoring (SEM) was conducted for Third and Fourth Quarter 2016. Refer to the Third and Fourth Quarter 2016 SEM Reports located in Appendix H, for detailed results.

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

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

- Third Quarter 2016 - August 10, 2016 and September 17 and 20, 2016; and
- Fourth Quarter 2016 - October 12, 2016 and November 16, 2016.

During the Third Quarter 2016 component leak testing at the wellfield on September 17, 2016, a leak was detected at Well NILEW479. Remediation efforts were initiated and a faulty flex hose was replaced on September 20, 2016, and no further leaks were detected. No additional leaks were detected during the Third and Fourth Quarter 2016 monitoring at the wellfield or the A-2 and A-3 Flares. Refer to the Quarter LFG Component Leak Monitoring Forms, located in Appendix I, for detailed results.

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

The Annual Waste Acceptance Rate was compiled for the timeframe of August 1, 2016 through January 31, 2017. The amount of waste accepted during this period was approximately 265,897 tons. The degradable current Waste-In-Place as of January 31, 2017 is approximately 30,662,381 tons.

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

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

2.10 Wellhead Monitoring Data (BAAQMD 8-34-501.4 & 8-34-505)

Wellhead monitoring was performed on a monthly basis pursuant to 8-34-505. The well readings for August 1, 2016 through January 31, 2017 are included in Appendix J. Each well was monitored in accordance with the following requirements:

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

Wellhead monitoring was performed on the following dates:

- August 2, 3, 5, 10, 11, 12, 17, 18, 24, 25, 26, and 31, 2016;
- September 1, 2, 7, 8, 13, 14, 15, 16, 21, 22, 26, 27, and 28, 2016;
- October 5, 7, 12, 13, 14, 19, 20, 21, 25, and 26, 2016;
- November 3, 4, 9, 10, 11, 13, 14, 16, 17, 18, 23, 29, and 30, 2016;
- December 1, 5, 6, 7, 8, 14, 15, 16, 20, 21, 22, 28, and 30, 2016; and
- January 4, 5, 9, 11, 12, 13, 18, 19, 25, 26, and 31, 2017.

2.10.1 Wellhead Deviations (BAAQMD 8-34-501.9 & 560.757(f)(1))

There were 138 individual wells with readings that exceeded the limits set forth in BAAQMD Regulation 8-34-305 during the reporting period. Corrective action for wells was initiated within the required 5-day time period and re-monitoring was completed within 15 days of the deviation pursuant to BAAQMD Regulation 8-34-414. See Appendix K, Wellfield Deviation Log, for more detail.

2.10.2 Higher Operating Value (HOV) Wells

Oxygen HOV Wells

Pursuant to Title V Permit Condition Number 10423, Part 6(c)(i), the oxygen concentration limit does not apply to the wells listed below, provided that the oxygen concentration in the

LFG at the main header does not exceed five percent oxygen by volume (dry basis) and the methane concentration is greater than 35 percent by volume (dry basis): 30RR, EW-09, EW-13, 72R, 101R, 103R, 13R, EW-20R, 224R, 237R, HC-201, HC-231, HC-232, HC-235, HC-237, HC-239, HC-240, and HC-241.

Temperature HOV Wells

Pursuant to Title V Permit Condition Number 10423, Part 6(d)(i), the following wells are approved to operate at a temperate HOV of 145°F: EW-39R, EW-40R, EW-14, EW-15, EW-37, 5, A, B, C, D, E, 14, 16, 19, 25, 106R, 218, 224R, 243, 31R, 51R, and 54R. Pursuant to Title V Permit Condition Number 10423, Part 6(d)(ii), the following well is approved to operate at a temperate HOV of 150°F: EW07R.

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

The flare LFG flow rate is measured with a Rosemount flowmeter. The General Electric data panel displays the LFG flow and the digital Yokogawa data recorder records LFG flow every minute and is downloaded and saved to a compact flash card. The flare flow meter meets the requirements of BAAQMD Regulation 8-34-508 by recording data at least every 15 minutes. The flow meter is maintained and calibrated pursuant to manufacturer's recommendations. The flow data for the flare is available for review at Newby Island. Appendix L contains a summary of the monthly LFG flow rates for the flares. Appendix F contains the Flare Temperature Deviation/ Inoperative Monitor/Missing Data Report for August 1, 2016 through January 31, 2017. Compliance with Title V Permit Condition Number 10423 Part 10

Pursuant to Title V Permit Condition Number 10423, Part 10(a), quarterly hydrogen sulfide (H₂S) readings were taken using Draeger tubes. Third and Fourth Quarter 2016 H₂S readings and quarterly averages are included in Appendix N, H₂S Quarterly Monitoring.

2.12 Compliance with BAAQMD Regulation 8, Rule 34, Section 303 and Title 17 California Code of Regulations Section 95465(a)(1)

"8-34-303: Effective July 1, 2002 and except as provided in Sections 8-34-110, 111, 113, 118, 121 and 122, at no point on the landfill surface shall there be a surface leak that exceeds 500 ppm by volume, expressed as methane above background, other than non-repeatable, momentary readings, unless the landfill surface leak has been discovered by the operator and all of the requirements of Section 8-34-415 are satisfied."

"17 CCR Section 94565(a)(1): Except as provided in sections 95464(d), 95464(e), and 95466, beginning January 1, 2011, or upon commencing operation of a newly installed gas collection and control system or modification of an existing gas collection and control system pursuant to

95464(a)(1), whichever is later, no location on the MSW landfill surface may exceed either of the following methane concentration limits:

- (1) 500 ppmv, other than non-repeatable, momentary readings, as determined by instantaneous surface emissions monitoring."

On August 29, 2016, Newby Island received a Notice of Violation (NOV), number A55678 due to surface leaks exceeding 500 ppm. Cornerstone, on behalf of the Recyclery and International Disposal Corp. of California (IDCC), Newby Island, submitted a combined 10-Day Response and 10-Day and 30-Day Title V Deviation Reports regarding NOV number A55678 to the BAAQMD on September 7, 2016. Please refer to Appendix B, BAAQMD Correspondence, for the letter submitted on September 7, 2016.

2.13 Compliance with BAAQMD Regulation 8, Rule 34, Section 305.1 and 17 California Code of Regulations Section 95464(c)

"8-34-305.1: Each wellhead shall operate under a vacuum (negative pressure)

17 CCR Section 95464(c): Each wellhead must be operated under a vacuum (negative pressure), except as provided in sections 95464(d) and 95464(e)."

On August 29, 2016, Newby Island received a NOV, number A55679, due to three wellheads operating under positive pressure. Cornerstone, on behalf of IDCC, Newby Island, submitted a combined 10-Day Response and 10-Day and 30-Day Title V Deviation Reports regarding NOV number A55679 to the BAAQMD on September 7, 2016. Please refer to Appendix B, BAAQMD Correspondence, for the letter submitted on September 7, 2016.

2.14 Compliance with BAAQMD Regulation 9, Rule 8, Section 304

"Emission Limits - Compression-Ignited Engines: Effective January 1, 2012, a person shall not operate a stationary internal combustion compression-ignited engine unless one of the applicable emission limits in ppmv corrected to 15% oxygen, dry basis set forth for NOx and CO is met:

On November 14, 2016, Newby Island received NOV numbers A55681 and A55682. NOV number A55681 was issued due to nitrous oxide (NOx) levels detected during source testing conducted by the BAAQMD, Source Test Number 17045, for the Diamond Z Grinder (S-35) exceeding parameter limits, which occurred on August 25, 2016. NOV number A55682 was issued due to NOx levels detected during source testing conducted by the BAAQMD, Source Test Number 17046, for the 830 Power-screen (S-37) exceeding permitted limits, which occurred on August 30, 2016. Cornerstone, on behalf of IDCC, Newby Island, submitted a 10-Day Response to NOV Numbers A55681 and A55682 to the BAAQMD on November 22, 2016. Please refer to Appendix B, BAAQMD Correspondence, for the letter submitted on November 22, 2016.

2.15 Compliance with §60.757(f)(6)

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

The GCCS was modified pursuant to Title V Permit Number A9013 during the reporting period.

There were 14 wellfield SSM events that occurred during the reporting period. There were four vertical wells decommissioned during the reporting period pursuant to Application Number 27202.

Title V Permit Condition Number 10423, Part 6(b) and Change of Permit Conditions dated May 29, 2015 with Application Number (AN) 27202 still allows for the replacement of up to unlimited vertical wells, installation of up to 28 new vertical wells, installation of up to 29 new horizontal collectors, the decommissioning of up to 69 vertical wells, and the decommissioning of up to 18 horizontal collectors.

As of January 31, 2017, Newby Island consists of 240 vertical wells, 22 horizontal collectors and five leachate cleanout risers.

2.16 Compliance with Title V Permit Condition Number 14908 for S-4 Non-Retail Gasoline Dispensing Facility G#9641

Appendix O contains monthly throughput records for this reporting period. The gasoline throughput is within the limit of 940,000 gallons (gal) per any consecutive 12-month period pursuant to the BAAQMD Toxic Section Policy.

2.17 S-8 Horizontal Grinder/Operations and S-9 Trommel Screen/Operations

The S-8 Horizontal Grinder/Operations and S-9 Trommel Screen/Operations replaced the previously existing Sources S-5 and S-6 and are registered under the California Air Resources Board (CARB) Portable Equipment Registration Program (PERP). The S-8 Horizontal Grinder/Operation is permitted under CARB PERP Registration Number 149997. The S-9 Trommel Screen/Operation is permitted under CARB PERP Registration Number 125994. Applications for the S-8 Horizontal Grinder/Operation and S-9 Trommel Screen/Operations are currently pending with the BAAQMD to be incorporated into the Title V as stationary equipment.

3 PERFORMANCE TEST REPORT

In accordance with BAAQMD Rule 8-34-413 and 40 CFR §60.757(g) in the NSPS, a Performance Test Report is required to be submitted from subject facilities containing performance and monitoring data for the operation of the GCCS. The A-1 Callidus Flare was decommissioned on March 4, 2015. On May 29, 2015, Republic sent a notification to BAAQMD that the A-1 Callidus Flare had been permanently taken out of operation. The operational records listed in Table 3-1 have been reviewed, summarized, and are included in the Performance Test Report section of this report. A copy of the most recent Performance Tests, conducted on February 29, 2016 for the A-2 and A-3 Flares, was included in Appendix P of the previous report, which was submitted to the BAAQMD and USEPA on August 31, 2016.

TABLE 3-1 - PERFORMANCE TEST REQUIREMENTS

Rule	Requirement	Location in Report
8-34-412, §60.8, §60.752(b)(2)(iii)(B), §60.754(d)	Compliance Demonstration Test	Section 3.1
§60.757(g)(1)	A diagram of the collection system showing collection system positioning including all wells, horizontal collectors, surface collectors, or other gas extraction devices, including the locations of any areas excluded from collection and the proposed sites for future collection system expansion.	Section 3.2, Appendix A
§60.757(g)(2)	The data upon which the sufficient density of wells, horizontal collectors, surface collectors, or other gas extraction devices and the gas mover equipment sizing are based.	Section 3.3
§60.757(g)(3)	The documentation of the presence of asbestos or non-degradable material for each area from which collection wells have been excluded based on the presence of asbestos or non-degradable material.	Section 3.4
§60.757(g)(4)	The sum of the gas generation flow rates for all areas from which collection wells have been excluded based on non-productivity and the calculations of gas generation flow rate for each excluded area.	Section 3.5
§60.757(g)(5)	The provisions for increasing gas mover equipment capacity with increased gas generation flow rate, if the present gas mover equipment is inadequate to move the maximum flow rate expected over the life of the landfill.	Section 3.6
§60.757(g)(6)	The provisions for the control of off-site migration.	Section 3.7 Appendix M

3.1 Flare (A-2 and A-3) Compliance Demonstration Test Results (BAAQMD 8-34-412)

The Compliance Demonstration Test (Performance Test) was performed on the A-2 and A-3 Flares by Blue Sky Environmental, Inc. on February 29, 2016 pursuant to BAAQMD Regulation 8-34-412.

The results of the Performance Tests for the A-2 and A-3 Flares indicate that the flares are in compliance with BAAQMD Regulation 8-34-301.3. The Performance Test Report for the A-2 and A-3 Flares that meets the requirements of both BAAQMD Rule 8-34-413 and 40 CFR §60.758(g) was submitted to the BAAQMD on March 30, 2016. The report is included in Appendix P of the previous report, which was submitted to the BAAQMD and USEPA on August 31, 2016.

3.2 Compliance with §60.757(G)(1)

"A diagram of the collection system showing collection system positioning including wells, horizontal collectors..."

A map of the LFG collection system showing the location of all vertical wells, horizontal collectors, and other LFG extraction devices is included in Appendix A.

3.3 Compliance with §60.757(G)(2)

"The data upon which the sufficient density of wells, horizontal collectors, surface collectors, or other gas extraction devices and the gas mover equipment sizing are based."

The existing GCCS has historically provided LFG wells and collectors spaced in accordance with standard industry practices. Based on continuous compliance and operational experience the installed collector density appears more than adequate for controlling surface emissions and subsurface LFG migration.

The landfill operator will conduct routine monitoring in accordance with NSPS requirements. If the GCCS at the Landfill does not meet the measures of performance set forth in the NSPS, the GCCS will be adjusted or modified as required.

The existing GCCS conveyance piping and emission control devices have sufficient capacity to handle all current and future LFG flow rates (based on quarterly surface emissions monitoring results and monthly wellhead readings). New emission control devices will be designed and permitted as appropriate for future landfill LFG generation rates.

3.4 Compliance with §60.757(G)(3)

"The documentation of the presence of asbestos or non-degradable material for each area from which collection wells have been excluded based on the presence of asbestos or non-degradable material."

Segregated areas or accumulations of asbestos material were not documented for the site in the GCCS Design Plan. Therefore, §60.757(g)(3) is not applicable.

3.5 Compliance with §60.757(G)(4)

"The sum of the gas generation flow rates for all areas from which collection wells have been excluded based on non-productivity and the calculations of gas generation flow rate for each excluded area."

There are no non-productive areas that have been excluded from the coverage of the GCCS. Therefore, §60.757(g)(4) is not applicable.

3.6 Compliance with §60.757(G)(5)

"The provisions for increasing gas mover equipment capacity with increased gas generation flow rate, if the present gas mover equipment is inadequate to move the maximum flow rate expected over the life of the landfill."

The existing GCCS conveyance piping and emission control devices have sufficient capacity to handle all current and future LFG flow rates. New emission control devices will be designed and permitted as appropriate for future landfill LFG generation rates.

3.7 Compliance with §60.757(G)(6)

"The provisions for the control of off-site migration."

Quarterly LFG migration monitoring, including all probes and on-site buildings, occurred on the following dates:

- Third Quarter 2016 – August 10 and 30, 2016;
- Fourth Quarter 2016 – October 13, November 16, December 5 and 16, 2016.

The Third and Fourth Quarter 2016 LFG Probe and In-Structure Monitoring Reports are included in Appendix M.

The Landfill operator will continue surface and perimeter monitoring in accordance with the approved monitoring plans. If the GCCS at the Landfill does not meet the measures of performance set forth in the NSPS, the GCCS will be adjusted or modified in accordance with the NSPS requirements.

4 START-UP, SHUTDOWN, MALFUNCTION REPORT

4.1 SSM Log for the GCCS at Newby

The NESHAP contained in 40 CFR Part 63, AAAA for MSW landfills to control hazardous air pollutants include the regulatory requirements for submittal of a semi-annual report (under 40 CFR §63.10(d)(5) of the general provisions) if an SSM event occurred during the reporting period. The reports required by §63.1980(a) of the NESHAP and §60.757(f) of the NSPS summarize the GCCS exceedances. These two semi-annual reports contain similar information and have been combined as allowed by §63.10(d)(5)(i) of the General Provisions.

NESHAP 40 CFR part 63, AAAA became effective on January 16, 2004. Those SSM events that occurred during the NSPS semi-annual reporting period are reported in this section (August 1, 2016 through January 31, 2017). The following information is included as required:

- During the reporting period, 122 A-2 Flare SSM events occurred. The A-2 Flare was shut down and restarted during the reporting period due to the reasons noted in Appendix D, Flare SSM Log
- During the reporting period, 149 A-3 Flare SSM events occurred. The A-3 Flare was shut down and restarted during the reporting period due to the reasons noted in Appendix D, Flare SSM Log
- During the reporting period, 14 Wellfield SSM events occurred. Details are included in Appendix C, Well SSM Log.
- There were 285 events in total. In all 285 events, automatic systems and operator actions were consistent with the standard operating procedures contained in the SSM Plan. There were no deviations from the SSM plan.
- Exceedances were not identified during the reporting period in any applicable emission limitation in the landfills NESHAP (§63.10(d)(5)(i)).
- Revisions of the SSM Plan to correct deficiencies in the landfill operations or procedures were neither required, nor prepared (§63.6(e)(3)(viii)).

I certify the following:

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



Signature of Responsible Official

2/23/17
Date

Evan Boyd
Name of Responsible Official