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TV Tracking #1094 (Semi-Annual)

1. ☐ RECEIVED IN ENFORCEMENT: 02/28/2025

Direction 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 Semi-Annual Report, 8-34 Semi-Annual Report, Title V Semi-Annual Monitoring Report and SSM Plan Report
Newby Island Landfill, Milpitas, California (Title V Facility No. A9013)

Dear Sir or Madam:

International Disposal Corp of CA (IDCC) is pleased to submit the enclosed combined National Emission Standards for Hazardous Air Pollutants (NESHAP) Semi-Annual Report, Bay Area Air Quality Management District (BAAQMD), Regulation 8, Rule 34 Semi-Annual Report, Semi-Annual Startup, Shutdown and Malfunction (SSM) Plan Report, and Title V Semi-Annual Monitoring Report to the BAAQMD and the U.S. Environmental Protection Agency (USEPA) Region IX for the Newby Island Landfill (Newby). The NESHAP report, Title V Semi-Annual Monitoring Report, the BAAQMD Rule 8-34 Semi-Annual Report, and the SSM Plan Report covers the period from August 1, 2024 through January 31, 2025. The Title V Annual Compliance Certification is also included in this submittal and covers the period from February 1, 2024 through January 31, 2025.

The Title V reports meet the requirements specified in the Title V Permit, BAAQMD guidance on Title V report submittals, and BAAQMD Regulation 2, Rule 6. The BAAQMD 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 Federal of Regulations [CFR] Part 60, Subpart WWW), including 40 CFR 60.757(f). This report also satisfies the reporting requirements under NESHAP AAAA and NSPS Subpart XXX. 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 Newby. Please note, the updated NESHAP rule went into effect on September 27, 2021, removing SSM Plan requirements. As there are still SSM Plan references in Newby's Title V Permit, Newby will continue to comply with the SSM reporting requirements.

If you have any questions regarding this submittal, please do not hesitate to call me at (408) 586-2263 or email me at JFreedman@republicservices.com.

Sincerely,

Jon Freedman
Environmental Manager
Newby Island Landfill

cc: Ben Wade, IDCC
Maria Bowen, SCS Engineers
Pat Sullivan, SCS Engineers

NESHAP/NSPS/BAAQMD Rule 8-34 Semi-Annual Report, SSM Plan Semi-Annual Report, and Title V Semi-Annual Report
Newby Island Landfill
Milpitas, California (Facility No. 9013)

Prepared for:

International Disposal Corporation of California
1601 Dixon Landing Road
Milpitas, CA 95035

For Submittal to:

Bay Area Air Quality Management District
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San Francisco, CA 94105

SCS ENGINEERS

01205162.04 Task 7 | February 2025

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This submittal consisting of the National Emission Standards for Hazardous Air Pollutants (NESHAP)/New Source Performance Standards (NSPS)/Bay Area Air Quality Management District (BAAQMD) Rule 8-34 Semi-Annual Report, the Semi-Annual Startup, Shutdown, and Malfunction Plan Report, and the Title V Semi-Annual Monitoring Report for the Newby Island Landfill in Milpitas, California, dated February 2025, was prepared and reviewed by the following:

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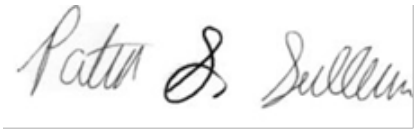

Patrick S. Sullivan, REA, CPP, BCES
Senior Vice President
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SECTION I. NESHAP/NSPS/BAAQMD RULE 8-34 SEMI-ANNUAL REPORT

1.0 INTRODUCTION

On behalf of the International Disposal Corporation of California (IDCC), SCS Engineers (SCS) hereby submits this Semi-Annual National Emission Standards for Hazardous Air Pollutants (NESHAP) Report, New Source Performance Standard (NSPS), 40 Code of Federal Regulations (CFR) Part 60, Subparts WWW and XXX / Bay Area Air Quality Management District (BAAQMD or District) Rule 8-34 Semi-Annual Report and Semi-Annual Start-up, Shutdown, and Malfunction (SSM) Plan Report for the Newby Island Sanitary Landfill and Recyclery (Newby) for the period of August 1, 2024 through January 31, 2025 to the BAAQMD and the United States Environmental Protection Agency (EPA).

The Semi-Annual Report pertains to the landfill gas (LFG) collection and control system (GCCS) operated at Newby.

1.1 UPDATED NESHAP 40 CFR 63, SUBPART AAAA

This Semi-Annual report also meets the requirements of the NESHAP for Municipal Solid Waste (MSW) landfills, 40 CFR 63, Subpart AAAA and complies with the requirements specified in Newby's Title V permit.

Due to the site's permitted design capacity being over the 2.5 million Megagram/2.5 million cubic meter limits and having an uncontrolled non-methane organic compound (NMOC) content exceeding 50 Megagrams per year (mg/year), as of September 27, 2021, Newby became subject to the updated landfill NESHAP under 40 CFR 63, Subpart AAAA requirements. The NESHAP implements and enhances provisions of 40 CFR 60, Subparts XXX (which were updated NSPS for Municipal Solid Waste (MSW) landfills promulgated in 2016) as well as removes the SSM Plan requirements. However, because the Title V Permit references Subpart WWW and SSM, this semi-annual report will continue to include Subpart WWW and SSM requirements. References to Subpart WWW and SSM will be removed from all reports after a new Title V Permit is issued removing references to Subpart WWW and updating applicable regulations, or we otherwise obtain approval from the BAAQMD to only comply with the new requirements. Newby has chosen to comply with equivalent provisions of Subpart AAAA in lieu of Subpart XXX, as allowed by the regulations.

This Semi-Annual report includes a certification signed by a Responsible Official which is provided in Appendix A. In accordance with the NESHAP for Landfills, this report is submitted semi-annually.

The Semi-Annual Report pertains to the landfill gas (LFG) collection and control system (GCCS) operated at Newby.

This report includes the following information, as required by BAAQMD Rule 8-34-411:

- All collection system and/or component downtime and reasons for the shutdown (8-34-501.1).

- All emission control system downtime and reason for the shutdown (8-34-501.2).

- Continuous temperature monitoring and dates of any excesses (8-34-501.3 and 507).
- Testing performed to satisfy of the requirements of this Rule (8-34-501.4).
- Monthly LFG flow rates and excesses (8-34-501.5).
- Collection and emission control system leak testing and any excesses, action taken to correct excesses, and re-monitored concentrations (8-34-501.6 and 503).
- Landfill surface monitoring, location of excesses, excess concentration, date discovered, actions taken to repair the excess, and re-monitored concentrations (8-34-501.6 and 506).
- Annual waste acceptance rate and the current amount of waste in-place (8-34-501.7).
- Records of non-degradable waste if area is excluded from LFG collection (8-34-501.8).
- Well head monitoring including gauge pressure, LFG temperature, and LFG oxygen concentration (8-34-501.9 and 505).
- Continuous flow monitoring (8-34-501.10).

Information summarizing the monitoring activities associated with the above-listed items is provided in the following sections.

2.0 SITE BACKGROUND INFORMATION

Newby is a MSW landfill located in Milpitas, California and is owned and operated by IDCC. The municipal refuse disposal site is located in Santa Clara County on the western terminus of Dixon Landing Road. The 342-acre landfill began accepting waste circa 1930 and is currently in operation.

Newby is subject to NSPS Subpart XXX since it commenced construction, reconstruction, or modification after July 17, 2014. Pursuant to NSPS Subpart XXX, Newby was required to initiate GCCS operations, including associated monitoring, recordkeeping, and reporting, on September 4, 2019 (30 months after the submittal of the NMOC Emissions Rate Report). For ease of recordkeeping, Newby elected to begin reporting effective September 1, 2019. However, due to potentially overlapping requirements, Newby is continuing to report semi-annually under the existing Title V which includes NSPS Subpart WWW requirements and Rule 8-34. This report also covers reporting requirements under NSPS Subpart XXX and NESHAP Subpart AAAA.

2.1 EXISTING AIR PERMITS

Newby maintains a BAAQMD Permit to Operate (PTO) (Plant No. 9013), which includes conditions for the wellfield, collection system, and A-2 and A-3 Flare stations (Condition No. 10423). This condition incorporates all applicable requirements from NSPS Subpart WWW and from BAAQMD Rule 8-34, which are addressed in this report. Newby also maintains a Title V Permit (Facility No. A9013), which expired on December 20, 2017. On June 20, 2017, a Title V Renewal Application was submitted to the BAAQMD. The site currently operates under an application shield. On November 30, 2021, the BAAQMD informed IDCC that the renewal application (A/N 28723) is open and in process and another renewal application would not be needed.

A GCCS Design Plan was prepared for the site to review and determine the adequacy of the existing LFG system. The current design of the system was determined to be adequate to comply with both NSPS and BAAQMD Rule 8-34 requirements. The GCCS is designed to control surface emissions, as well as to minimize subsurface lateral migration of LFG. Both the perimeter of the landfill and the landfill surface are monitored on a quarterly basis.

Additional details regarding the GCCS are in the GCCS Design Plan that was previously submitted to the BAAQMD. A drawing showing the existing GCCS is provided in **Appendix B**.

2.2 EXISTING LANDFILL GAS COLLECTION AND CONTROL SYSTEM

The GCCS at Newby consists of extraction wells used to collect the LFG from within the landfill (the "wellfield") and a piping system (the "collection system") used to convey the collected LFG to the control systems for destruction. The LFG is extracted from the landfill through a combination of vertical gas extraction wells and horizontal gas extraction trenches/pipes, as well as leachate collection system components. All landfill gas is controlled by one of more of the following means: The A-2 and A-3 Flares.

A diagram of the GCCS displaying system component locations is shown in the site plan(s) provided in **Appendix B**.

3.0 MONITORING AND RECORDS

This NSPS Semi-Annual Report for Newby is being submitted to the BAAQMD and USEPA in compliance with 40 CFR Subpart WWW ("NSPS"), including 40 CFR 60.757(f), which describe the items to be submitted in an annual report for landfills seeking to comply with NSPS using an active collection system. In compliance with 40 CFR 63, Subpart AAAA (NESHAP for MSW Landfills), this report is submitted semi-annually.

Please note, the Newby is subject to the 40 CFR Subpart XXX (New NSPS) by commencing construction on its approved expansion. The references in this report notes Subpart WWW and Subpart XXX.

Newby is also subject to the new 40 CFR Subpart AAAA (NESHAPs), which went into effect on September 27, 2021, at which time the SSM reporting requirements no longer apply. However, as the SSM requirements are still noted in the Title V Permit, the SSM report has not been closed out as of the submittal of this report.

This section of the report represents the Semi-Annual Monitoring Report and covers the items required to be reported in the applicable rules under 40 CFR Part 60, Subpart WWW, 40 CFR Part 60, Subpart XXX, and 40 CFR Part 63, Subpart AAAA. The reporting period is from August 1, 2024 through January 31, 2025. The table below summarizes the corresponding sections for the regulatory references addressed in this report:

Table 1. Reporting Requirements, Corresponding Regulatory References

Section	NSPS Subpart XXX	Updated NESHAP Subpart AAAA
Pressure Requirements	40 CFR 60.763(b)	40 CFR 63.1958(b)
Temperature and Oxygen Requirements	40 CFR 60.763(c)	40 CFR 63.1958(c)
Corrective Action Analysis	40 CFR 60.767(g)(7)	40 CFR 63.1981(h)(7)
Enhanced Monitoring	--	40 CFR 63.1981(h)(8)
Surface Emissions Monitoring	40 CFR 60.763(d)	40 CFR 63.1958(d)
Venting to Control System	40 CFR 60,763(e)	40 CFR 63.1958(e)
Cover Integrity	40 CFR 60.765(c)(5)	40 CFR 63.1960(c)(5)
Enclosed Flare	40 CFR 60.766(b)	40 CFR 63.1961(b)
Open Flare	40 CFR 60.766(c)	40 CFR 63.1961(c)
Other Control Device	40 CFR 60.766(d)	40 CFR 63.1961(d)
Exceedances	40 CFR 60.767(g)(1)	40 CFR 63.1981(h)(1)
Gas Stream Diverted	40 CFR 60.767(g)(2)	40 CFR 63.1981(h)(2)
Control Device Downtime	40 CFR 60.767(g)(3)	40 CFR 63.1981(h)(3)
Collection System Downtime	40 CFR 60.767(g)(4)	40 CFR 63.1981(h)(4)
3-Hour Temperature	40 CFR 60.768(c)(1)(i)	40 CFR 63.1983(c)(1)(i)
Additional Surface Emissions Monitoring	40 CFR 60.767(g)(5)	40 CFR 63.1981(h)(5)
Well Expansion	40 CFR 60.767(g)(6)	40 CFR 63.1981(h)(6)
Source Test	--	--
Liquids Reporting	40 CFR 60.767(k)	--
24-Hour High Temperature	--	40 CFR 63.1981(k)

3.1 CONTINUOUSLY MONITORED PARAMETERS

According to BAAQMD Rule 8-34-301.1, the GCCS must be operated continuously. To comply with this requirement, the landfill owner/operator is required to maintain full-time operation of the LFG collection system and control devices, as well as individual extraction wells. Downtime for any of these components must be reported in the Rule 8-34 Semi-Annual Report. This information is summarized below and in the attached tables. Records of continuously monitored parameters are available for review at the site.

3.1.1 Gas Extraction System Downtime

All collected gases were conveyed to the flare station control system. The flare station is equipped with an automatic shutdown and alarm system that powers down the specific blower whenever a flare shuts down to ensure that no collected LFG is vented to the atmosphere untreated.

During the reporting period, the LFG extraction system was off-line on several occasions for a total of 27.47 hours. Shutdowns involved pre-programmed or manual system shutdowns prior to non-

compliant operation or equipment failure, and involved inspection, maintenance and/or repair of the GCCS, and thus meet the criteria for allowed GCCS downtime, as specified in Rule 8-34-113 and in accordance with the BAAQMD November 5, 2018 Compliance Advisory.

A summary of the GCCS downtime for this reporting period is provided in **Table 1a**, including the date, reason for the downtime, description of the corrective measure(s) implemented to resume GCCS operation, and the total elapsed time for each event. Gas extraction system downtime records are available for review at the site.

3.1.2 Emission Control System Downtime

During the reporting period, the A-2 and A-3 Flares were off-line on several occasions. Summaries of the A-2 and A-3 Flares downtime are provided in **Table 1b and 1c**, including the date, reason for the downtime, and the total elapsed time for each event. During the reporting period, downtime for the A-2 Flare occurred over a cumulative period of approximately 39.47 hours and for the A-3 Flare over a cumulative period of approximately 124.67 hours. Downtime of the GCCS was minimized to limit surface emissions. These hours are only related to individual flare downtime, not downtime of the entire GCCS. During each control device downtime event, the gas flow to the flares was shut down immediately, resulting in no free venting of LFG. This met the work practice standard of the NESHAP and NSPS rules.

Emission control system downtime records are available for review at the site.

3.1.3 Individual Well Downtime

In some instances, the entire GCCS may not go off-line, but individual extraction wells may be taken off-line for inspection, maintenance, and/or repair, and active filling in the vicinity of the well, as well as for other unforeseen circumstances. These are generally planned events, although such events can occur without notice. During the previous reporting period, there were wells that were temporarily taken offline for a portion of the reporting period due to active filling and construction activities occurring in their vicinity.

IDCC submitted a Request for Limited Exemption from the requirements of BAAQMD Regulation 8-34 117.1 through 117.6 and Regulation 8-34-118 Construction Plan (118 Plan) for construction activities to the BAAQMD prior to commencing each construction project. The 118 Plan included additional details concerning the temporary disconnection of individual LFG wells, however downtime was minimized throughout the duration of construction. IDCC submitted 118 Plans to the BAAQMD for construction events on the following dates:

- August 14, 2024; GCCS construction to occur August 21, 2024 through October 31, 2024
- January 13, 2025; GCCS construction to occur January 21, 2025 through March 31, 2025

As of the end of the reporting period, zero (0) wells were temporarily disconnected from the GCCS due to active filling or construction activities. Details of individual well shutdown and well startups occurring during the reporting period are provided in **Table 2**. Please see the SSM Report included in this submittal for additional details.

3.1.4 Flow Meter and Temperature Gauge Downtime

The continuous operation of the GCCS is measured through the continuous measurement of LFG flow to each flare and flare combustion temperature. As required by Rule 8-34, each flare at Newby

is equipped with flow measuring devices and temperature gauges that provide continuous readout displays using digital chart recorders. During the reporting period, the flow meter(s) and temperature gauge(s)/recorders at the flare station did not go out of operation due to malfunction or other breakdown conditions. Continuous monitoring and calibration information are available for review at the site.

3.1.5 Flare Combustion Zone Temperature

Newby is required by permit condition No. 10423, Part 9 to operate the A-2 and A-3 Flares in such a manner that the combustion zone temperature of the flares does not drop below the permitted limit of 1,400 and 1,501 degrees Fahrenheit (°F), respectively, (averaged over a 3-hour period) or a higher or lower temperature based on the most recent source test.

From August 1, 2024 through January 31, 2025, the minimum temperature at which the A-2 Flare was required to operate over a 3-hour period was 1,427°F (1,477 °F minus 50 °F), based on the February 7, 2024 source test performed by Blue Sky Environmental, Inc. (final report issued on March 20, 2024).

From August 1, 2024 through January 31, 2025, the minimum temperature at which the A-3 Flare was required to operate over a 3-hour period was 1,513°F (1,563 °F minus 50 °F), based on the February 7, 2024 source test performed by Blue Sky Environmental, Inc. (final report issued on March 20, 2024).

Please note that under the updated NESHAP rules, the flare combustion zone temperature requirement is the source test temperature minus 82°F, but as BAAQMD Rule 8-34 and NSPS WWW are still in Newby's permit, we will continue to comply with the source test temperature minus 50°F temperature limit.

During the reporting period, the A-2 and A-3 Flares operated above the minimum established 3-hour average temperature limit at all times, except during periods of SSM.

Flare temperature records are available for review at the site. Excerpts of the 2024 source test results are included in **Appendix D.**

3.2 COMPONENT LEAK QUARTERLY MONITORING

During the reporting period, quarterly testing of the GCCS components for any leaks with a methane concentration of greater than 1,000 parts per million by volume (ppmv), as required by BAAQMD Rule 8-34-301.2 and 8-34-503, was conducted. Testing in the wellfield and at the flare station was performed using a flame ionization detector (FID) which was calibrated on the same day as the testing. Monitoring results and calibration records are provided in **Appendix C** and are available for review at the site.

3.2.1 Third Quarter 2024 Monitoring

SCSFS conducted the component leak testing of the flare station and wellfield on September 23, 2024. No component leaks above 1,000 ppmv were detected in the wellfield or at the flare station during the Third Quarter 2024 monitoring event.

3.2.1 Fourth Quarter 2024 Monitoring

SCSFS conducted the component leak testing of the flare station and wellfield on December 19, 2024. One (1) component leak above 1,000 ppmv was detected at the flare station during the Fourth Quarter 2024 monitoring event. Corrective actions were initiated and subsequent re-monitoring indicated the locations returned compliance on December 23, 2024. No component leaks above 1,000 ppmv were detected in the wellfield.

3.3 CONTROL EFFICIENCY

LFG Flares A-2 and A-3 was also tested on February 7, 2024 to demonstrate compliance with the control efficiency standard of 98 percent NMOC destruction efficiency or outlet concentration of 30 ppmv of NMOC as methane (for flares) as required by BAAQMD Rules 8-34-301.3, 8-34-412, 8-34-501.4, and Condition # 10423, Part 11. The NMOC destruction efficiency for the A-2 Flare during the February 2024 source test was measured to be >98.38 percent by weight, and the NMOC as methane concentration in the flare outlet was <3.0 ppmv. The NMOC destruction efficiency for the A-3 Flare during the February 2024 source test was measured to be >98.85 percent by weight, and the NMOC as methane concentration in the flare outlet was <2.4 ppmv. As such, Flares A-2 and A-3 operate in accordance with the aforementioned rules and permit condition by meeting the ppmv limit.

Excerpts from the February 2024 source test report dated March 20, 2024, summarizing the test results, are provided in Appendix D.

3.4 LANDFILL SURFACE EMISSIONS MONITORING

Surface emissions monitoring (SEM) was conducted at Newby on a quarterly basis during the reporting period, in accordance with BAAQMD Rule 8-34-303 and 8-34-506. The SEM events were conducted in accordance with the SEM plan in the landfill's GCCS Design Plan. Testing was performed using a Trimble SiteFID Landfill Gas Monitor Portable FID, which was calibrated the same day as the testing. The results of this monitoring are summarized below. Reports for each quarterly monitoring event are provided in Appendix C. Records of SEM are available for review at the site.

3.4.1 Third Quarter 2024 Monitoring

SCSFS field technicians monitored the landfill surface for leaks with a methane concentration of greater than 500 ppmv above background on September 23, 24, 25, 26; and October 3, 11, and 24, 2024. Surface emissions in excess of 500 ppmv were detected at fifty-eight (58) locations during the third quarter 2024 monitoring event. The locations of the exceedances and associated methane concentrations are provided in the First Quarter 2024 SEM report (Appendix C).

SCSFS field technicians performed appropriate corrective actions, including flow increases to the surrounding extraction wells, cover repairs, and installation of borehole emission control systems. SCSFS completed the first and second 10-day re-monitoring events for these locations on October 3 and 11, 2024 and the 30-day re-monitoring event on October 24, 2024. Based on the re-monitoring results, multiple locations remained above the 500 ppmv threshold, therefore a system expansion was required to be completed by January 22, 2025. GCCS construction events completed between August 21 and October 31, 2024 resulted in an expansion of the GCCS and startup of new collectors to fulfill this requirement.

3.4.1 Fourth Quarter 2024 Monitoring

SCSFS field technicians monitored the landfill surface for leaks with a methane concentration of greater than 500 ppmv above background on December 17, 18, 19, 23, 26, and 27, 2024 and January 17, 20, and 28, 2025. Surface emissions in excess of 500 ppmv were detected at fifty-one (51) locations during the fourth quarter 2024 monitoring event. The locations of the exceedances and associated methane concentrations are provided in the Fourth Quarter 2024 SEM report (**Appendix C**). Additionally, unforeseen precipitation events resulted in a delay in the completion of the Fourth Quarter 2024 SEM event. An Alternative Compliance Option request was submitted to the BAAQMD on December 24, 2024 for the affected re-monitoring events.

SCSFS field technicians performed appropriate corrective actions, including flow increases to the surrounding extraction wells, cover repairs, and installation of borehole emission control systems. SCSFS completed the first and second 10-day re-monitoring events for these locations on December 26, 2024 and January 17, 2025 and the 30-day re-monitoring events on January 20 and 28, 2025. Based on the re-monitoring results, multiple locations remained above the 500 ppmv threshold, therefore a system expansion is required to be completed by April 16, 2025.

Additionally, BAAQMD and California Air Resources Board (CARB) personnel completed a site inspection on November 6, 2024. During the inspection, the regulatory agencies detected multiple surface emissions exceedances. Site personnel initiated corrective action upon discovery and completed subsequent re-monitoring events within the required timelines. Corrective actions included component adjustments, wellhead adjustments, cover repairs, and installation of well bore seals and borehole emission control systems. On November 18, 2024, the BAAQMD issued Notice of Violation (NOV) Number A61899 to Newby for the exceedances detected. CARB issued an additional NOV on January 7, 2025 for the same inspection date.

3.5 WELLHEAD MONTHLY MONITORING

Monthly wellhead monitoring for pressure, temperature, and oxygen content was conducted by SCSFS to comply with BAAQMD Rule 8-34-305 and 9-34-414. The results of this monitoring are summarized below. Wellhead exceedances are provided in **Table 3, 4, and 5.**

Please note that during the reporting period, all active wells were monitored.

3.5.1 Pressure

The majority of the operational extraction wells were under negative pressure during the monitoring events conducted during the reporting period, in accordance with BAAQMD Rule 8-34-305 and 8-34-414. For any wells that exhibited positive pressure during this reporting period, the identification number and dates that each well was operating with positive pressure are provided in **Table 3**. The table also includes corrective action and re-monitoring results. In all instances, corrective action and re-monitoring were performed in accordance with the 5- and 15-day requirements specified in the NSPS regulations and in Rule 8-34.

All wells were operating under negative pressure at the end of this reporting period.

Per 40 CFR 63.1960(a)(3)(i), a “root cause analysis” (RCA) is required if pressure exceedances cannot be corrected in 15 days. An additional “corrective action analysis” (CAA) and notification is required for corrective actions that require more than 60 days to complete. See Section 3.5.4 for

discussion of those additional corrective action requirements and **Appendix D** for RCA forms, CAA forms, and 75-day notifications.

3.5.2 Oxygen

Newby has elected to use oxygen as its compliance standard under Rule 8-34-305, rather than nitrogen. Per Newby's PTO Condition No. 10423, Part 6(c), 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 in the LFG at the main header is greater than 35 percent by volume (dry basis). The oxygen Higher Operating Value (HOV) of 15% is approved for wells: 30RR, EW-13, l0lR, HC- 201. The oxygen HOV of 20% is approved for wells: HC-231, HC- 232, HC- 235, HC-237, and HC- 241.

The majority of the wells were operating within the regulatory limit of five (5) percent oxygen or their respective oxygen HOVs during the monitoring events conducted during the reporting period. The dates when wells were operating with excessive oxygen, and the well identification number, corrective actions, and re-monitoring results for these wells are provided in **Table 4**.

As of the end of the reporting period, nine (9) wells were operating with an oxygen concentration above the 5 percent limit. The wells will be evaluated for a HOV request or returned to below the 5 percent limit as specified in BAAQMD Rule 8-34-414, and compliance will be documented in the next semi-annual report.

Please note, the oxygen limit has been removed from Subparts XXX and AAAA; however, Newby complied with the oxygen limit during the reporting period per Rule 8-34 and its Title V permit.

3.5.3 Temperature

BAAQMD Rule 8-34-305 requires the landfill gas temperature in each wellhead to measure less than 55 degrees Celsius (°C) or 131°F. However, Condition No. 10423, Part 6(d) in Newby's BAAQMD PTO allows Newby to operate wells EW-39R, EW-40R, EW-14, EW-37, EW-005, EW-00A, EW-00D, EW-00E, EW-019, EW-025, EW-106, EW-218, EW-224, EW-243, EW-51R, EW-54R, NI3EW07R, NI3EW31, NILEW106, NILEW464, NILEW466, NILEW479, NILEW481, NILEW482, NILEW488, NILEW489, NILEW497, NILEW511, NILEW568, NILEW570, NILEW599, NILEW601, NILEW604, NILEW617, NILEW621, NILEW622, NILEW623, NILEW626, NILEW628, NILEW663, NILEW664, NILEW665, NILEW666, and NILEW667 at an alternative temperature of 145°F and well EW-07R at an alternative temperature of 150°F.

The majority of wells were operating within their respective limits of 131°F, 145°F, and 150°F during the monitoring events conducted during the reporting period. The dates when wells were operating above their respective temperature limits, and the well identification number, correction actions, and re-monitoring results for these wells are provided in **Table 5.**

As of the end of this reporting period, all wells were operating with a temperature lower than 131°F.

An HOV application to request an increase of the allowable wellhead temperature limit from 131°F to 145°F for wells NILEW690, NILEW691, NILEW701, and NILEW703 was submitted to the USEPA and BAAQMD on February 6, 2020. Addendums requesting an increase of the allowable wellhead temperature limit from 131°F to 145°F for wells NILEW476, NILEW642, NILEW703, NILEW707, and

NILEW752 were submitted in April 2020 and August 2021. The BAAQMD has provided approval of these HOV limits pending approval from the USEPA.

IDCC has followed up with the USEPA regarding the applications on multiple occasions since 2020 but no response has been received. IDCC is currently awaiting a response to the HOV requests.

Per 40 CFR 63.1960(a)(4)(i), an RCA is required if temperature exceedances cannot be corrected in 15 days. An additional CAA and notification is required for corrective actions that require more than 60 days to complete. See Section 3.5.4 for discussion of those additional corrective action requirements and **Appendix E** for RCA forms, CAA forms, and 75-day notifications.

3.5.4 Corrective Action Analysis

RCAs were conducted for wells with temperature and pressure exceedances past 15 days. During the reporting period, there were three (3) exceedances beyond 60 days in duration, therefore the site completed the CAAs and 75-day notifications.

3.5.5 Enhanced Monitoring

Per §63.1961(a)(5), enhanced monitoring is required at each well with a measurement of landfill gas temperature greater than 145°F. During the reporting period, enhanced monitoring was not required at any wells pursuant to Subpart AAAA.

There were no wells greater than 170°F during the reporting period.

3.6 COVER INTEGRITY MONITORING

Under BAAQMD Rule 8-34-510 and the NSPS, the landfill surface must be monitored at least monthly for evidence of cracks or other surface integrity issues, which could allow for surface emissions. During the reporting period, cover integrity monitoring was conducted by SCSFS personnel in conjunction with the wellhead monitoring on August 30, September 30, October 30, November 28, and December 31, 2024 and January 31, 2025, using procedures specified in the GCCS Design Plan. The observations during these monitoring events indicated the landfill surface was in good condition. In the event visual evidence suggested otherwise, SCSFS alerted site personnel and the surface was promptly repaired. Records of cover integrity monitoring are available for review upon request.

3.7 GAS GENERATION ESTIMATE AND MONTHLY LANDFILL GAS FLOW RATES

The Newby is not subject to Rule 8-34-404 because the Landfill does not operate less than continuously. Therefore, monthly flow data are not required to be reported.

3.8 ANNUAL WASTE ACCEPTANCE RATE AND REFUSE IN PLACE

Newby is an active landfill that continues to accept refuse for disposal. From August 1, 2024 through January 31, 2025, the site accepted 849,168.61 tons of decomposable waste and cover material, resulting in a cumulative waste-in-place total of 41,933,161.36 tons as of January 31, 2025.

3.8.1 Non-Degradable Waste Areas

No areas of non-degradable waste deposition are known to exist. There are no landfill areas that are excluded from the collection system requirements.

SECTION II. SSM PLAN REPORT

As mentioned previously, Newby is subject to 40 CFR Part 63, Subpart AAAA, the NESHAPS for MSW Landfills. Newby maintains a SSM Plan which documents the procedures for operating and maintaining the affected elements of the GCCS during startup, shutdown, and malfunction (SSM). The SSM events that occurred during the reporting period of August 1, 2024 through January 31, 2025 are documented in this section. SSM requirements per the updated NESHAP ended on September 27, 2021. However, because SSM reporting requirements are still in the Title V permit, we will continue to report until the conditions are removed.

During the reporting period, there were twenty-two (22) SSM events involving shutdown of the entire GCCS. All of these events were planned startups/shutdowns and there were no startup/shutdown events that were associated with a malfunction of the GCCS.

During the reporting period, there were thirty-five (35) SSM events involving the wellfield, resulting in a net increase in the number of LFG collection wells at the site.

There were no malfunctions of any of the wellfield components during the reporting period.

During the reporting period, there were no planned startups/shutdowns or known malfunctions of LFG monitoring equipment (e.g. flow measuring/recording device, temperature measuring/recording device).

In each case described above, the SSM Plan was successfully implemented. Specific information regarding these SSMs are included in **Tables 1a (entire GCCS), 1b (flares), and 2 (wells)**.

No revisions were made to the SSM Plan during this reporting period. A copy of the SSM Plan and all revisions/addenda are kept on file at the facility for at least five (5) years and are available to appropriate regulatory agency personnel for inspection.

SECTION III. TITLE V SEMI-ANNUAL REPORT

As specified in 40 CFR Part 70, reports of any required monitoring must be submitted at least every 6 months. All instances of deviations from permit requirements for the semi-annual reporting period, specified in the Landfill's Initial Title V Permit as August 1 through January 31 and February 1 through July 31, must be clearly identified in each report. This Title V Report covers the August 1, 2024 through January 31, 2025 reporting period.

This report has been prepared based on Table VII (Applicable Limits and Compliance Monitoring Requirements) of the Landfill's MFR Permit. The report includes a certification by a responsible official, consistent with §70.5(d).

The full Title V Semi-Annual Report, including certification by a responsible official, is provided as Appendix E.

Tables

Table 1a. GCCS Downtime
Newby Island Landfill, Milpitas, California
(August 1, 2024 through January 31, 2025)

Shutdown	Startup	Downtime Hours	Reason for Downtime	BAAQMD Exemption	Corrective Actions Taken
8/7/2024 10:22	8/7/2024 10:28	0.10	Manual Shutdown for Flare Maintenance and Troubleshooting (113)	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
8/17/2024 15:08	8/17/2024 18:58	3.83	Manual Shutdown for Flare Maintenance and Troubleshooting (113)	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
8/20/2024 14:02	8/20/2024 14:46	0.73	Manual Shutdown for Flare Maintenance and Troubleshooting (113)	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
8/22/2024 9:18	8/22/2024 12:14	2.93	Manual Shutdown for Flare Maintenance and Troubleshooting (113)	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
No GCCS downtime in September 2024.					
10/3/2024 12:32	10/3/2024 12:42	0.17	Manual Shutdown for Flare Maintenance and Troubleshooting (113)	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
10/4/2024 13:16	10/4/2024 13:28	0.20	Manual Shutdown for Flare Maintenance and Troubleshooting (113)	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
10/8/2024 10:38	10/8/2024 10:46	0.13	Manual Shutdown for Flare Maintenance and Troubleshooting (113)	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
10/22/2024 7:08	10/22/2024 7:34	0.43	Manual Shutdown for Flare Maintenance and Troubleshooting (113)	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
10/22/2024 11:22	10/22/2024 11:52	0.50	Manual Shutdown for Flare Maintenance and Troubleshooting (113)	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
10/29/2024 10:42	10/29/2024 11:44	1.03	Manual Shutdown for Flare Maintenance and Troubleshooting (113) Rental Flow Meters Installed	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
11/4/2024 14:46	11/4/2024 14:48	0.03	Manual Shutdown for Flare Maintenance and Troubleshooting (113)	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
11/5/2024 8:54	11/5/2024 16:36	7.70	Air Combustion Blower Filter Cleaning (113)	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
11/7/2024 8:20	11/7/2024 8:38	0.30	Manual Shutdown for Flare Maintenance and Troubleshooting (113)	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
11/7/2024 11:18	11/7/2024 11:30	0.20	Manual Shutdown for Flare Maintenance and Troubleshooting (113)	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
11/20/2024 9:18	11/20/2024 10:44	1.43	Manual Shutdown for Flare Maintenance and Troubleshooting (113)	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
12/2/2024 8:36	12/2/2024 10:22	1.77	Air Combustion Blower Filter Cleaning (113)	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
12/27/2024 8:36	12/27/2024 8:44	0.13	Air Combustion Blower Filter Cleaning (113)	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
1/22/2025 8:38	1/22/2025 12:04	3.43	Manual Shutdown for Flare Maintenance and Troubleshooting (113)	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
1/22/2025 12:24	1/22/2025 12:50	0.43	Manual Shutdown for Flare Maintenance and Troubleshooting (113)	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
1/23/2025 10:30	1/23/2025 11:14	0.73	Manual Shutdown for Flare Maintenance and Troubleshooting (113)	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
1/27/2025 13:44	1/27/2025 14:00	0.27	FL-150 Burner Tip Cleaning Event (113)	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
1/28/2025 13:22	1/28/2025 14:20	0.97	Air Compressor Maintenance (113)	8-34-113, Inspection & Maintenance	O&M personnel completed inspection then restarted the flares.
	Total:	**27.47**			

Notes:
Downtimes listed represent periods when all landfill gas combustion devices were offline concurrently (no gas flow from the collection system).

All events listed involved GCCS inspection and/or maintenance activities prior to start up (or as soon as feasible following programmed startups) in accordance with Rule 8-34-113 requirements and the BAAQMD Compliance Advisory for Municipal Solid Waste Landfills, dated November 5, 2018, with the exception of the events noted above. These events were considered reportable compliance activities (RCA) and breakdown relief was requested from the BAAQMD. All subsequent reporting was completed within the required timeframes.

Table 1b. A-2 Flare Downtime
Newby Island Landfill, Milpitas, California
(August 1, 2024 through January 31, 2025)

Shutdown	Startup	Downtime Hours	Reason for Downtime and BAAQMD Exemption
8/7/2024 10:22	8/7/2024 10:28	0.10	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
8/17/2024 15:08	8/17/2024 18:58	3.83	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
8/20/2024 14:02	8/20/2024 14:46	0.73	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
8/22/2024 9:18	8/22/2024 12:14	2.93	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
No device downtime during September 2024.			
10/3/2024 12:32	10/3/2024 12:44	0.20	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
10/4/2024 13:16	10/4/2024 13:30	0.23	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
10/8/2024 10:38	10/8/2024 10:46	0.13	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
10/22/2024 7:08	10/22/2024 7:34	0.43	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
10/22/2024 11:22	10/22/2024 11:52	0.50	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
10/29/2024 10:42	10/29/2024 11:44	1.03	Manual Shutdown for Flare Maintenance and Troubleshooting (113) Rental Flow Meters Installed
11/4/2024 11:00	11/4/2024 14:48	3.80	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
11/5/2024 8:54	11/5/2024 16:36	7.70	Air Combustion Blower Filter Cleaning (113)
11/7/2024 8:20	11/7/2024 11:32	3.20	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
11/20/2024 9:18	11/20/2024 10:52	1.57	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
12/2/2024 8:36	12/2/2024 10:22	1.77	Air Combustion Blower Filter Cleaning (113)
12/27/2024 8:36	12/27/2024 8:44	0.13	Air Combustion Blower Filter Cleaning (113)
1/22/2025 8:38	1/22/2025 12:04	3.43	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
1/22/2025 12:24	1/22/2025 12:50	0.43	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
1/23/2025 10:30	1/23/2025 11:14	0.73	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
1/27/2025 10:40	1/27/2025 16:16	5.60	FL-150 Burner Tip Cleaning Event (113)
1/28/2025 13:22	1/28/2025 14:20	0.97	Air Compressor Maintenance (113)
Total		**39.47**	

Notes:

Table 1b. A-2 Flare Downtime
Newby Island Landfill, Milpitas, California
(August 1, 2024 through January 31, 2025)

Shutdown	Startup	Downtime Hours	Reason for Downtime and BAAQMD Exemption

All events listed involved GCCS inspection and/or maintenance activities prior to start up (or as soon as feasible following programmed startups) in accordance with Rule 8-34-113 requirements and the BAAQMD Compliance Advisory for Municipal Solid Waste Landfills, dated November 5, 2018, with the exception of the events noted above. These events were considered reportable compliance activities (RCA) and breakdown relief was requested from BAAQMD. All subsequent reporting was completed within the required timeframes.

Per the Startup, Shutdown, and Malfunction (SSM) forms, a flare shutdown due to flame failure, temperature, or flow parameters are preventative parametric shutdowns as the flare cannot maintain the proper operating conditions to comply with the temperature/flow limits, so a preventative shutdown is activated to avoid non-compliance. Per BAAQMD 8-34-113 and the November 5, 2018 Compliance Advisory, a shutdown of air pollution control equipment prior to any non-compliance is allowable, given parametric indicators of the system (temperature or flow indicators) are predictive of a pending equipment failure and shutdown.

Table 1c. A-3 Flare Downtime
Newby Island Landfill, Milpitas, California
(August 1, 2024 through January 31, 2025)

Shutdown	Startup	Downtime Hours	Reason for Downtime and BAAQMD Exemption
8/3/2024 14:52	8/3/2024 15:04	0.20	Low Gas Flow , preventative/parametric shutdown (113)
8/5/2024 7:12	8/5/2024 8:42	1.50	Air Combustion Blower Filter Cleaning (113)
8/7/2024 10:22	8/7/2024 10:32	0.17	Low Gas Flow , preventative/parametric shutdown (113)
8/7/2024 14:14	8/7/2024 14:20	0.10	Low Gas Flow , preventative/parametric shutdown (113)
8/7/2024 16:26	8/7/2024 16:42	0.27	Low Gas Flow , preventative/parametric shutdown (113)
8/9/2024 10:20	8/9/2024 11:02	0.70	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
8/11/2024 21:38	8/11/2024 21:50	0.20	Low Gas Flow , preventative/parametric shutdown (113)
8/12/2024 16:32	8/12/2024 16:42	0.17	Low Gas Flow , preventative/parametric shutdown (113)
8/14/2024 4:42	8/14/2024 4:54	0.20	Low Gas Flow , preventative/parametric shutdown (113)
8/14/2024 22:52	8/14/2024 23:04	0.20	Low Gas Flow , preventative/parametric shutdown (113)
8/17/2024 15:04	8/17/2024 19:18	4.23	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
8/20/2024 13:58	8/20/2024 15:10	1.20	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
8/21/2024 11:26	8/21/2024 12:02	0.60	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
8/22/2024 9:18	8/22/2024 12:16	2.97	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
9/1/2024 0:24	9/1/2024 0:36	0.20	Low Gas Flow , preventative/parametric shutdown (113)
9/3/2024 13:20	9/3/2024 13:44	0.40	Low Gas Flow , preventative/parametric shutdown (113)
9/13/2024 13:34	9/13/2024 15:04	1.50	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
9/25/2024 0:26	9/25/2024 6:54	6.47	Flare Burner Tip Cleaning (113)
9/27/2024 14:36	9/27/2024 15:00	0.40	Low Gas Flow , preventative/parametric shutdown (113)
9/30/2024 14:36	9/30/2024 16:02	1.43	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
9/30/2024 16:24	9/30/2024 16:46	0.37	Low Gas Flow , preventative/parametric shutdown (113)
10/1/2024 12:38	10/1/2024 14:12	1.57	Air Combustion Blower Filter Cleaning (113)
10/2/2024 15:20	10/2/2024 16:08	0.80	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
10/3/2024 12:30	10/3/2024 12:42	0.20	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
10/3/2024 15:06	10/3/2024 15:32	0.43	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
10/3/2024 15:52	10/3/2024 16:38	0.77	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
10/4/2024 13:16	10/4/2024 13:28	0.20	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
10/4/2024 15:06	10/4/2024 15:36	0.50	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
10/6/2024 13:52	10/6/2024 22:44	8.87	Flare Maintenance and Troubleshooting (113)
10/7/2024 10:04	10/7/2024 13:10	3.10	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
10/8/2024 10:38	10/8/2024 10:58	0.33	Low Gas Flow , preventative/parametric shutdown (113)
10/9/2024 9:16	10/9/2024 11:52	2.60	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
10/10/2024 11:16	10/10/2024 11:28	0.20	Low Gas Flow , preventative/parametric shutdown (113)
10/10/2024 16:28	10/10/2024 17:28	1.00	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
10/10/2024 17:42	10/10/2024 18:58	1.27	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
10/10/2024 19:06	10/10/2024 22:08	3.03	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
10/11/2024 3:08	10/11/2024 3:28	0.33	Low Gas Flow , preventative/parametric shutdown (113)
10/11/2024 4:10	10/11/2024 4:18	0.13	Low Gas Flow , preventative/parametric shutdown (113)
10/11/2024 4:36	10/11/2024 4:42	0.10	Low Gas Flow , preventative/parametric shutdown (113)
10/11/2024 5:42	10/11/2024 6:14	0.53	Low Gas Flow , preventative/parametric shutdown (113)

Table 1c. A-3 Flare Downtime
Newby Island Landfill, Milpitas, California
(August 1, 2024 through January 31, 2025)

Shutdown	Startup	Downtime Hours	Reason for Downtime and BAAQMD Exemption
10/11/2024 6:26	10/11/2024 6:42	0.27	Low Gas Flow , preventative/parametric shutdown (113)
10/15/2024 7:18	10/15/2024 7:36	0.30	Low Gas Flow , preventative/parametric shutdown (113)
10/22/2024 7:04	10/22/2024 17:12	10.13	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
10/26/2024 7:26	10/26/2024 12:08	4.70	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
10/29/2024 10:42	10/29/2024 11:50	1.13	Manual Shutdown for Flare Maintenance and Troubleshooting (113)Rental Flow Meters Installed
10/29/2024 12:30	10/29/2024 13:00	0.50	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
10/29/2024 17:02	10/29/2024 17:24	0.37	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
10/30/2024 10:50	10/30/2024 11:32	0.70	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
11/4/2024 14:46	11/4/2024 14:56	0.17	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
11/5/2024 8:12	11/5/2024 16:48	8.60	Air Combustion Blower Filter Cleaning (113)
11/6/2024 13:08	11/6/2024 14:10	1.03	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
11/7/2024 8:20	11/7/2024 8:38	0.30	Low Gas Flow , preventative/parametric shutdown (113)
11/7/2024 11:18	11/7/2024 11:30	0.20	Low Gas Flow , preventative/parametric shutdown (113)
11/7/2024 16:56	11/7/2024 17:16	0.33	Low Gas Flow , preventative/parametric shutdown (113)
11/8/2024 9:14	11/8/2024 11:30	2.27	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
11/12/2024 14:20	11/12/2024 14:54	0.57	Low Gas Flow , preventative/parametric shutdown (113)
11/20/2024 9:18	11/20/2024 10:44	1.43	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
11/20/2024 13:14	11/20/2024 13:24	0.17	Low Gas Flow , preventative/parametric shutdown (113)
11/21/2024 10:36	11/21/2024 10:48	0.20	Low Gas Flow , preventative/parametric shutdown (113)
11/21/2024 11:04	11/21/2024 11:10	0.10	Low Gas Flow , preventative/parametric shutdown (113)
11/22/2024 19:14	11/22/2024 21:44	2.50	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
11/30/2024 14:24	11/30/2024 17:50	3.43	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
12/1/2024 12:24	12/1/2024 13:48	1.40	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
12/2/2024 7:38	12/2/2024 10:40	3.03	Air Combustion Blower Filter Cleaning (113)
12/4/2024 14:00	12/4/2024 14:46	0.77	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
12/5/2024 11:48	12/5/2024 12:22	0.57	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
12/9/2024 15:14	12/9/2024 15:24	0.17	Low Gas Flow , preventative/parametric shutdown (113)
12/12/2024 13:54	12/12/2024 14:04	0.17	Low Gas Flow , preventative/parametric shutdown (113)
12/27/2024 8:36	12/27/2024 9:22	0.77	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
12/27/2024 11:36	12/27/2024 14:12	2.60	Air Combustion Blower Filter Cleaning (113)
1/14/2025 15:12	1/14/2025 15:34	0.37	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
1/15/2025 13:04	1/15/2025 13:40	0.60	Minor Air Combustion Blower Filter Cleaning (113)
1/15/2025 14:08	1/15/2025 15:06	0.97	Minor Air Combustion Blower Filter Cleaning (113)
1/19/2025 6:20	1/19/2025 11:24	5.07	Major Air Combustion Blower Filter Cleaning (113)
1/21/2025 7:56	1/21/2025 16:24	8.47	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
1/21/2025 16:36	1/21/2025 17:06	0.50	Manual Shutdown for Flare Maintenance and Troubleshooting (113)

Table 1c. A-3 Flare Downtime
Newby Island Landfill, Milpitas, California
(August 1, 2024 through January 31, 2025)

Shutdown	Startup	Downtime Hours	Reason for Downtime and BAAQMD Exemption
1/22/2025 8:38	1/22/2025 12:12	3.57	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
1/22/2025 12:24	1/22/2025 13:10	0.77	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
1/22/2025 14:52	1/22/2025 17:56	3.07	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
1/22/2025 18:06	1/22/2025 18:50	0.73	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
1/23/2025 10:30	1/23/2025 11:16	0.77	Manual Shutdown for Flare Maintenance and Troubleshooting (113)
1/27/2025 13:44	1/27/2025 14:00	0.27	FL-150 Burner Tip Cleaning Event (113)
1/27/2025 16:14	1/27/2025 16:20	0.10	FL-150 Burner Tip Cleaning Event (113)
1/28/2025 13:22	1/28/2025 14:30	1.13	Air Compressor Maintenance (113)
Total		**124.67**	

Notes:

All events listed involved GCCS inspection and/or maintenance activities prior to start up (or as soon as feasible following programmed startups) in accordance with Rule 8-34-113 requirements and the BAAQMD Compliance Advisory for Municipal Solid Waste Landfills, dated November 5, 2018, with the exception of the events noted above. These events were considered reportable compliance activities (RCA) and breakdown relief was requested from BAAQMD. All subsequent reporting was completed within the required timeframes.

Per the Startup, Shutdown, and Malfunction (SSM) forms, a flare shutdown due to flame failure, temperature, or flow parameters are preventative parametric shutdowns as the flare cannot maintain the proper operating conditions to comply with the temperature/flow limits, so a preventative shutdown is activated to avoid non-compliance. Per BAAQMD 8-34-113 and the November 5, 2018 Compliance Advisory, a shutdown of air pollution control equipment prior to any non-compliance is allowable, given parametric indicators of the system (temperature or flow indicators) are predictive of a pending equipment failure and shutdown.

Table 2. Individual Well Startups, Shutdowns and Decommissions
Newby Island Landfill, Milpitas, California
(August 1, 2024 through January 31, 2025)

Well ID	Shutdown	Start-up	Days Offline	Reason for Shutdown/Startup
NILEW779	-	8/6/2024	-	New collector started up
NILEW782	-	8/6/2024	-	New collector started up
NILEW783	-	8/6/2024	-	New collector started up
NILCO003	-	8/6/2024	-	New collector started up
NILEW779	-	8/6/2024	-	New collector started up
NILEW782	-	8/6/2024	-	New collector started up
NILEW783	-	8/6/2024	-	New collector started up
NILFC003	-	8/6/2024	-	New collector started up
NILCO002	-	8/7/2024	-	New collector started up
NILCO001	-	8/7/2024	-	New collector started up
NILEW774	-	8/7/2024	-	New collector started up
NILFC003	8/23/2024	-	-	Collector abandoned
NILFC004	8/23/2024	-	-	Collector abandoned
NILHC259	-	9/5/2024	-	New collector started up
NILHC260	-	9/5/2024	-	New collector started up
NILHC261	-	9/5/2024	-	New collector started up
NILHC262	-	9/5/2024	-	New collector started up
NILFC016	9/17/2024	-	-	Collector abandoned
NILFC015	9/17/2024	-	-	Collector abandoned
NILFC014	9/17/2024	-	-	Collector abandoned
NILFC008	9/17/2024	-	-	Collector abandoned
NILFC011	9/17/2024	-	-	Collector abandoned
NILEW626	11/6/2024	-	-	Collector abandoned
NILFC018	11/6/2024	-	-	Collector abandoned
NILFC019	11/6/2024	-	-	Collector abandoned
NILFC11A	-	11/14/2024	-	New collector started up
NLCR0910	11/20/2024	-	-	Collector abandoned
NILEW720	12/24/2024	-	-	Collector abandoned
NILEW820	-	1/6/2025	-	New collector started up
NILEW822	-	1/6/2025	-	New collector started up
NILEW823	-	1/6/2025	-	New collector started up
NILEW825	-	1/6/2025	-	New collector started up
NILEW824	-	1/6/2025	-	New collector started up
NILFC010	1/6/2025	-	-	Collector abandoned
NILFC017	1/14/2025	-	-	Collector abandoned

Table 3. Wells with Pressure Exceedances
Newby Island Landfill, Milpitas, California
(August 1, 2024 through January 31, 2025)

Well ID	Date	Initial Static Pressure ("H_2O)	Adjusted Static Pressure ("H_2O)	5-Day Corrective Action Date	Corrective Action	15-Day Follow-Up Pressure ["H2O]	15-Day Follow-Up Date	Comments	Additional Corrective Action
NILEW019*	7/10/2024	2.13	2.14	7/10/2024	Valve adjusted	2.63	7/1/2024	Cleared 8/10/2024	RCA
NILEW025*	7/30/2024	1.22	1.24	7/30/2024	Valve adjusted	TBD	TBD	Cleared 8/13/2024	N/A
NILEW480*	5/14/2024	3.85	3.85	5/14/2024	Valve adjusted	3.14	5/24/2024	Cleared 8/29/2024	RCA, CAA, 75-day
NILEW690*	5/9/2024	6.03	5.91	5/9/2024	Valve adjusted	12.43	5/22/2024	Cleared 8/13/2024	RCA, CAA, 75-day
NILEW753*	5/14/2024	2.49	2.49	5/14/2024	Valve adjusted	1.80	5/1/2024	Cleared 8/29/2024	RCA, CAA, 75-day
NILEW800*	6/26/2024	0.41	0.37	6/26/2024	Valve adjusted	6.00	7/10/2024	Cleared 8/13/2024	RCA, CAA
NILHC244*	7/10/2024	0.18	0.16	7/10/2024	Valve adjusted	0.20	7/24/2024	Cleared 10/25/24	RCA, CAA, 75-day
NILHC256*	7/23/2024	21.68	22.36	7/23/2024	Valve adjusted	12.90	8/6/2024	Cleared 11/11/2024	RCA, CAA, 75-day
NILHC257*	7/23/2024	30.19	30.17	7/23/2024	Valve adjusted	0.07	8/6/2024	Cleared 8/28/2024	RCA
NILEW451	8/10/2024	0.27	0.10	8/10/2024	Valve adjusted	-50.94	8/23/2024	Cleared 8/23/2024	N/A
NILEW476	11/27/2024	0.60	0.52	11/27/2024	Valve adjusted	1.19	12/2/2024	Cleared 12/12/2024	N/A
NILEW479	9/11/2024	0.20	0.21	9/11/2024	Valve adjusted	-48.64	9/18/2024	Cleared 9/18/2024	N/A
NILEW480	8/13/2024	0.78	0.78	8/13/2024	Valve adjusted	-10.34	8/29/2024	Cleared 8/29/2024	RCA
NILEW066	8/10/2024	4.07	4.12	8/10/2024	Valve adjusted	-44.32	8/23/2024	Cleared 8/23/2024	N/A
NILEW667	8/12/2024	24.50	-4.20	8/12/2024	Valve adjusted	-9.66	8/15/2024	Cleared 8/12/2024	N/A
NILEW672	8/16/2024	26.87	-2.31	8/16/2024	Valve adjusted	-6.53	8/16/2024	Cleared 8/16/2024	N/A
NILEW675	8/2/2024	1.51	-47.05	8/2/2024	Valve adjusted	-51.27	8/16/2024	Cleared 8/2/2024	N/A
NILEW678	8/22/2024	2.74	-5.38	8/22/2024	Valve adjusted	-8.78	8/22/2024	Cleared 8/22/2024	N/A
NILEW690	8/29/2024	0.08	0.04	8/29/2024	Valve adjusted	-47.05	9/11/2024	Cleared 9/11/2024	N/A
NILEW744	8/10/2024	0.05	0.06	8/14/2024	Valve adjusted	-41.03	8/23/2024	Cleared 8/14/2024	N/A
NILEW762	8/6/2024	5.87	5.87	8/6/2024	Valve adjusted	-3.27	8/21/2024	Cleared 8/21/2024	N/A
NILEW774	8/7/2024	1.44	1.44	8/7/2024	Valve adjusted	-51.56	8/15/2024	Cleared 8/15/2024	N/A
NILEW779	8/6/2024	14.58	14.58	8/6/2024	Valve adjusted	-28.97	8/21/2024	Cleared 8/21/2024	N/A
NILEW782	8/6/2024	4.42	4.42	8/6/2024	Valve adjusted	-11.98	8/16/2024	Cleared 8/16/2024	N/A
NILEW783	8/6/2024	47.09	47.12	8/6/2024	Valve adjusted	-45.14	8/21/2024	Cleared 8/21/2024	N/A
NILEW797	9/5/2024	0.01	-0.13	9/5/2024	Valve adjusted	-0.31	9/5/2024	Cleared 9/5/2024	N/A
NILEW799	8/13/2024	0.01	0.00	8/13/2024	Valve adjusted	-0.01	8/27/2024	Cleared 8/13/2024	N/A
NILEW799	9/5/2024	0.01	0.00	9/5/2024	Valve adjusted	0.00	9/18/2024	Cleared 9/18/2024	N/A
NILEW799	9/27/2024	0.01	0.01	9/27/2024	Valve adjusted	0.03	10/3/2024	Cleared 10/25/2024	RCA
NILEW817	9/11/2024	1.10	-0.17	9/11/2024	Valve adjusted	-0.32	9/11/2024	Cleared 9/11/2024	N/A
NILCO001	8/7/2024	5.65	5.60	8/7/2024	Valve adjusted	-5.95	8/15/2024	Cleared 8/15/2024	N/A
NILCO001	12/11/2024	7.23	7.38	12/11/2024	Valve adjusted	-34.23	12/26/2024	Cleared 12/26/2024	N/A
NILCO002	8/7/2024	4.87	4.86	8/7/2024	Valve adjusted	1.33	8/15/2024	Cleared 8/15/2024	N/A
NILCO003	8/7/2024	2.10	-0.21	8/7/2024	Valve adjusted	-1.21	8/7/2024	Cleared 8/7/2024	N/A
NILHC250	8/14/2024	15.29	-0.59	8/14/2024	Valve adjusted	-0.23	8/28/2024	Cleared 8/14/2024	N/A
NILHC259	9/5/2024	0.44	0.47	9/5/2024	Valve adjusted	-3.02	9/10/2024	Cleared 9/10/2024	N/A
NILHC260	9/5/2024	0.11	0.11	9/5/2024	Valve adjusted	-0.12	9/10/2024	Cleared 9/10/2024	N/A
NILHC261	9/5/2024	0.14	0.15	9/5/2024	Valve adjusted	0.14	9/5/2024	Cleared 9/27/2024	RCA
NILHC262	9/5/2024	0.11	0.11	9/5/2024	Valve adjusted	0.05	9/5/2024	Cleared 9/27/2024	RCA

Note: All required corrective action and remonitoring was completed in accordance with Rule 8-34 and NSPS timelines.

All pressure exceedance were corrected within 15 days except for the wells noted in ***bold italics*** . Root cause analysis forms were completed for these wells.

*Wells noted ***with an asterisk*** indicates wells remained in exceedance for pressure as of the end of the previous reporting period. RCA/CAA/75-day forms were submitted with the previous

Table 4. Wells with Oxygen Exceedances
Newby Island Landfill, Milpitas, California
(August 1, 2024 through January 31, 2025)

Well ID	Date	Initial O2 [%]	5-Day Corrective Action Date	Corrective Action	Adjusted O2 [%]	15-Day Follow-Up Date	Comments
NILEW119	1/7/2025 11:44	20.8	1/7/2025	Valve adjusted	20.8	1/17/2025	Remains in exceedance
NILEW430	8/19/2024 13:19	6.6	8/19/2024	Valve adjusted	7.8	9/3/2024	Cleared 9/3/2024
NILEW457	12/3/2024 12:02	9.8	12/3/2024	Valve adjusted	4.9	12/21/2024	Cleared 12/3/2024
NILEW470	9/4/2024 14:15	13.6	9/4/2024	Valve adjusted	15.2	9/18/2024	Cleared 9/18/2024
NILEW476	8/10/2024 10:37	6.2	8/10/2024	Valve adjusted	4.8	8/23/2024	Cleared 8/10/2024
NILEW476	8/23/2024 13:01	7.1	8/23/2024	Valve adjusted	7.5	9/5/2024	Cleared 9/5/2024
NILEW496	9/20/2024 13:00	7.2	9/20/2024	Valve adjusted	9.0	9/27/2024	Cleared 9/27/2024
NILEW497	11/26/2024 11:33	13.4	11/26/2024	Valve adjusted	9.5	12/2/2024	Cleared 12/2/2024
NILEW497	1/7/2025 15:38	6.7	1/7/2025	Valve adjusted	5.9	1/15/2025	Cleared 1/15/2025
NILEW514	8/10/2024 12:57	12.1	8/10/2024	Valve adjusted	8.4	8/23/2024	Cleared 9/12/2024
NILEW514	10/30/2024 15:20	10.1	10/30/2024	Valve adjusted	14.5	11/7/2024	Cleared 12/13/2024
NILEW514	1/13/2025 14:08	11.7	1/13/2025	Valve adjusted	10.8	1/17/2025	Cleared 1/17/2025
NILEW569	8/6/2024 16:02	20.8	N/A	Valve adjusted	N/A	8/26/2024	Cleared 8/26/2024
NILEW569	9/27/2024 10:03	7.2	9/27/2024	Valve adjusted	15.6	10/1/2024	Cleared 10/1/2024
NILEW592	9/16/2024 12:02	5.9	9/16/2024	Valve adjusted	3.9	10/2/2024	Cleared 9/16/2024
NILEW620	8/12/2024 15:50	12.4	8/12/2024	Valve adjusted	12.4	8/22/2024	Cleared 8/22/2024
NILEW625	11/7/2024 13:48	6.0	11/7/2024	Valve adjusted	6.4	11/19/2024	Cleared 12/30/2024
NILEW626	8/7/2024 15:27	20.3	N/A	Valve adjusted	N/A	8/23/2024	Well Abandoned 11/6/24
NILEW639	9/16/2024 14:27	7.7	9/16/2024	Valve adjusted	7.5	9/27/2024	Cleared 9/27/2024
NILEW649	9/5/2024 14:44	7.5	9/5/2024	Valve adjusted	7.4	9/17/2024	Cleared 10/2/2024
NILEW672	8/2/2024 10:58	11.2	8/2/2024	Valve adjusted	11.1	8/16/2024	Cleared 8/16/2024
NILEW672	10/2/2024 11:35	6.9	10/2/2024	Valve adjusted	7.3	10/4/2024	Cleared 10/16/2024
NILEW672	12/18/2024 15:26	12.5	12/18/2024	Valve adjusted	2.9	1/3/2025	Cleared 1/3/2025
NILEW674	8/10/2024 12:45	5.6	8/14/2024	Valve adjusted	0.0	8/23/2024	Cleared 8/14/2024
NILEW678	8/12/2024 16:37	7.2	8/12/2024	Valve adjusted	6.8	8/22/2024	Cleared 8/22/2024
NILEW691	12/31/2024 14:56	9.9	12/31/2024	Valve adjusted	13.8	1/6/2025	Cleared 1/6/2025
NILEW703	9/11/2024 15:54	16.3	9/11/2024	Valve adjusted	18.5	9/25/2024	Cleared 10/14/2024
NILEW703	1/13/2025 14:02	14.6	1/13/2025	Valve adjusted	14.5	1/17/2025	Cleared 1/17/2025
NILEW706	8/26/2024 14:55	6.9	8/26/2024	Valve adjusted	8.1	9/6/2024	Cleared 9/6/2024
NILEW720	8/27/2024 11:47	12.6	8/27/2024	Valve adjusted	12.3	9/5/2024	Well Abandoned 12/24/24
NILEW725	10/12/2024 11:36	19.6	10/12/2024	Valve adjusted	20.7	10/16/2024	Cleared 10/16/2024
NILEW749	8/10/2024 11:23	6.8	8/10/2024	Valve adjusted	8.0	8/23/2024	Cleared 8/23/2024
NILEW759	8/12/2024 15:26	11.3	8/12/2024	Valve adjusted	11.6	8/22/2024	Cleared 8/22/2024
NILEW762	8/6/2024 10:23	21.5	8/6/2024	Valve adjusted	16.8	8/21/2024	Cleared 9/12/2024
NILEW763	9/12/2024 16:29	10.9	9/12/2024	Valve adjusted	0.2	9/27/2024	Cleared 9/12/2024
NILEW763	1/29/2025 13:16	16.5	1/29/2025	Valve adjusted	16.8	N/A	Remains in exceedance
NILEW765	9/18/2024 11:52	10.7	9/18/2024	Valve adjusted	11.1	9/27/2024	Cleared 11/11/2024
NILEW774	9/10/2024 15:04	7.7	9/10/2024	Valve adjusted	7.4	9/25/2024	Cleared 9/25/2024
NILEW783	10/2/2024 17:15	7.6	10/2/2024	Valve adjusted	7.8	10/4/2024	Cleared 10/4/2024
NILEW792	9/5/2024 15:56	6.2	9/5/2024	Valve adjusted	6.2	9/18/2024	Cleared 9/18/2024
NILEW795	8/22/2024 13:56	11.1	8/22/2024	Valve adjusted	19.6	9/5/2024	Cleared 9/27/2024
NILEW798	9/27/2024 9:12	11.4	9/27/2024	Valve adjusted	20.6	10/2/2024	Cleared 10/2/2024
NILEW805	8/6/2024 10:38	12.5	8/6/2024	Valve adjusted	12.2	8/21/2024	Cleared 9/5/2024
NILEW811	8/13/2024 16:30	7.6	N/A	Valve adjusted	N/A	8/23/2024	Cleared 11/6/2024

Table 4. Wells with Oxygen Exceedances
Newby Island Landfill, Milpitas, California
(August 1, 2024 through January 31, 2025)

Well ID	Date	Initial O2 [%]	5-Day Corrective Action Date	Corrective Action	Adjusted O2 [%]	15-Day Follow-Up Date	Comments
NILEW811	11/27/2024 9:54	8.7	11/27/2024	Valve adjusted	8.5	12/2/2024	Cleared 12/31/2024
NILCW004	9/16/2024 9:52	5.7	9/16/2024	Valve adjusted	5.1	10/1/2024	Cleared 10/1/2024
NILCW004	1/20/2025 11:03	15.5	1/20/2025	Valve adjusted	16.0	1/30/2025	Cleared 1/30/2025
NILFC002	8/9/2024 14:11	16.3	N/A	Valve adjusted	N/A	8/23/2024	Cleared 9/5/2024
NILFC002	10/25/2024 15:27	17.9	10/25/2024	Valve adjusted	15.7	10/31/2024	Remains in exceedance
NILFC003	8/14/2024 14:27	21.3	N/A	Valve adjusted	N/A	8/23/2024	Well Abandoned 8/23/24
NILFC004	8/9/2024 14:16	19.8	8/10/2024	Valve adjusted	20.6	8/23/2024	Well Abandoned 8/23/24
NILFC007	8/23/2024 10:51	15.5	8/23/2024	Valve adjusted	15.6	9/6/2024	Cleared 9/6/2024
NILFC008	8/9/2024 14:08	17.9	N/A	Valve adjusted	N/A	8/23/2024	Well Abandoned 9/17/24
NILFC010	8/23/2024 10:13	7.1	8/23/2024	Valve adjusted	7.1	9/5/2024	Cleared 10/25/2024
NILFC010	11/6/2024 15:07	20.3	11/6/2024	Valve adjusted	20.6	11/11/2024	Remains in exceedance
NILFC011	8/9/2024 14:00	18.7	N/A	Valve adjusted	N/A	8/23/2024	Well Abandoned 9/17/24
NILFC012	12/31/2024 15:09	12.0	12/31/2024	Valve adjusted	18.1	1/6/2025	Remains in exceedance
NILFC013	8/9/2024 13:50	10.3	N/A	Valve adjusted	N/A	8/23/2024	Cleared 8/23/2024
NILFC013	9/5/2024 14:17	20.7	9/5/2024	Valve adjusted	18.3	9/17/2024	Cleared 11/27/2024
NILFC013	1/6/2025 16:12	13.5	1/6/2025	Valve adjusted	13.8	1/15/2025	Remains in exceedance
NILFC014	8/9/2024 13:46	20.5	N/A	Valve adjusted	N/A	8/23/2024	Well Abandoned 9/17/24
NILFC015	8/9/2024 13:44	15.3	N/A	Valve adjusted	N/A	8/23/2024	Well Abandoned 9/17/24
NILFC016	8/9/2024 13:42	20.5	N/A	Valve adjusted	N/A	8/23/2024	Well Abandoned 9/17/24
NILFC017	8/2/2024 15:40	13.9	8/2/2024	Valve adjusted	13.5	8/16/2024	Cleared 8/16/2024
NILFC017	9/17/2024 14:35	20.6	9/17/2024	Valve adjusted	20.6	9/26/2024	Well Abandoned 1/14/25
NILFC018	8/2/2024 15:35	8.6	8/2/2024	Valve adjusted	7.1	8/16/2024	Well Abandoned 11/6/24
NILFC019	8/2/2024 15:32	19.1	N/A	Valve adjusted	N/A	8/16/2024	Well Abandoned 11/6/24
NILFC020	9/5/2024 13:36	20.1	9/5/2024	Valve adjusted	19.5	9/17/2024	Cleared 11/6/2024
NILFC020	11/27/2024 12:54	19.6	11/27/2024	Valve adjusted	19.9	12/3/2024	Remains in exceedance
NILFC11A	12/3/2024 14:01	6.6	12/3/2024	Valve adjusted	4.9	N/A	Cleared 12/3/2024
NILFC11A	12/31/2024 15:14	21.5	12/31/2024	Valve adjusted	20.6	1/6/2025	Remains in exceedance
NILHC201	10/14/2024 6:33	10.4	10/14/2024	Valve adjusted	4.3	10/30/2024	Cleared 10/14/2024
NIHC-245	8/27/2024 11:37	11.7	8/27/2024	Valve adjusted	14.4	9/5/2024	Cleared 10/3/2024
NIHC-245	11/13/2024 13:30	12.1	11/13/2024	Valve adjusted	12.6	11/19/2024	Remains in exceedance
NILHC253	9/10/2024 16:43	15.3	9/10/2024	Valve adjusted	14.6	9/25/2024	Cleared 9/25/2024
NILHC253	11/26/2024 11:42	19.7	11/26/2024	Valve adjusted	20.4	12/2/2024	Cleared 12/26/2024
NILHC254	10/14/2024 6:50	16.8	10/14/2024	Valve adjusted	17.3	10/16/2024	Cleared 10/16/2024
NILMW005	8/14/2024 13:13	21.7	N/A	Valve adjusted	N/A	8/26/2024	Cleared 9/12/2024
NILMW014	10/12/2024 12:30	10.1	10/12/2024	Valve adjusted	10.5	10/16/2024	Cleared 10/16/2024
NILMW017	10/12/2024 12:23	9.2	10/12/2024	Valve adjusted	7.0	10/16/2024	Cleared 10/16/2024
NILMW017	1/13/2025 11:06	15.4	1/13/2025	Valve adjusted	17.7	1/22/2025	Cleared 1/28/2025
NILMW019	8/23/2024 12:09	15.9	8/23/2024	Valve adjusted	15.4	9/6/2024	Cleared 10/24/2024
NILMW019	11/15/2024 14:37	16.1	11/20/2024	Valve adjusted	11.6	11/27/2024	Cleared 12/26/2024
NILMW020	10/12/2024 12:12	6.7	10/12/2024	Valve adjusted	4.6	10/24/2024	Cleared 10/12/2024
NILMW023	10/12/2024 12:01	8.2	10/12/2024	Valve adjusted	2.5	10/25/2024	Cleared 10/12/2024
NILMW032	8/7/2024 16:07	20.3	N/A	Valve adjusted	N/A	8/21/2024	Cleared 8/21/2024
NILMW032	9/6/2024 13:31	9.1	9/6/2024	Valve adjusted	9.0	9/20/2024	Cleared 9/20/2024
NILMW032	10/8/2024 13:03	20.2	10/8/2024	Valve adjusted	19.9	10/11/2024	Cleared 10/16/2024

Table 4. Wells with Oxygen Exceedances
Newby Island Landfill, Milpitas, California
(August 1, 2024 through January 31, 2025)

Well ID	Date	Initial O2 [%]	5-Day Corrective Action Date	Corrective Action	Adjusted O2 [%]	15-Day Follow-Up Date	Comments
NILMW032	12/26/2024 12:29	5.7	12/26/2024	Valve adjusted	6.7	1/7/2025	Cleared 1/7/2025
NILMW034	9/6/2024 13:19	6.7	9/6/2024	Valve adjusted	6.9	9/20/2024	Cleared 9/20/2024
NLCR0910	8/2/2024 13:19	20.2	8/6/2024	Valve adjusted	20.7	8/16/2024	Well Abandoned 11/20/24

Note: All required corrective action and monitoring was completed in accordance with Rule 8-34 and NSPS timelines

Table 2. Wells with Temperature Exceedances
Newby Island Landfill, Milpitas, California
(August 1, 2024 through January 31, 2025)

Well ID	Date	Initial Temp [°F]	Adjusted Temp [°F]	5-Day Corrective Action Date	Corrective Action	15-Day Follow-Up Temperature	15-Day Follow-Up Date	Comments	Additional Corrective Action
NILEW750	8/26/2024 14:09	131.2	130.8	8/26/2024	Valve adjusted	130.3	8/27/2024	Cleared 8/27/2024	N/A
NILEW759	10/3/2024 16:35	123.7	134.2	10/4/2024	Valve adjusted	130.4	10/4/2024	Cleared 10/4/2024	N/A
NILHC250	8/14/2024 14:49	142.6	142.4	8/14/2024	Valve adjusted	143.8	8/28/2024	Cleared 11/14/2024	RCA, CAA, 75-day

Note: All required corrective action and remonitoring was completed in accordance with Rule 8-34 and NSPS timelines.

All temperature exceedance were corrected within 15 days except for the wells noted in ***bold italics*** . Root cause analysis forms were completed for these wells.

*Wells noted ***with an asterick*** indicates wells remained in exceedance at the end of the reporting period.

Appendix A – Responsible Official Certification Form

Certification of Truth and Accuracy and Completeness:

I certify the following:

Based on the information and belief formed after reasonable inquiry, the information in this document are true, accurate, and complete:

Paul Enrique Perez

Signature of Responsible Official

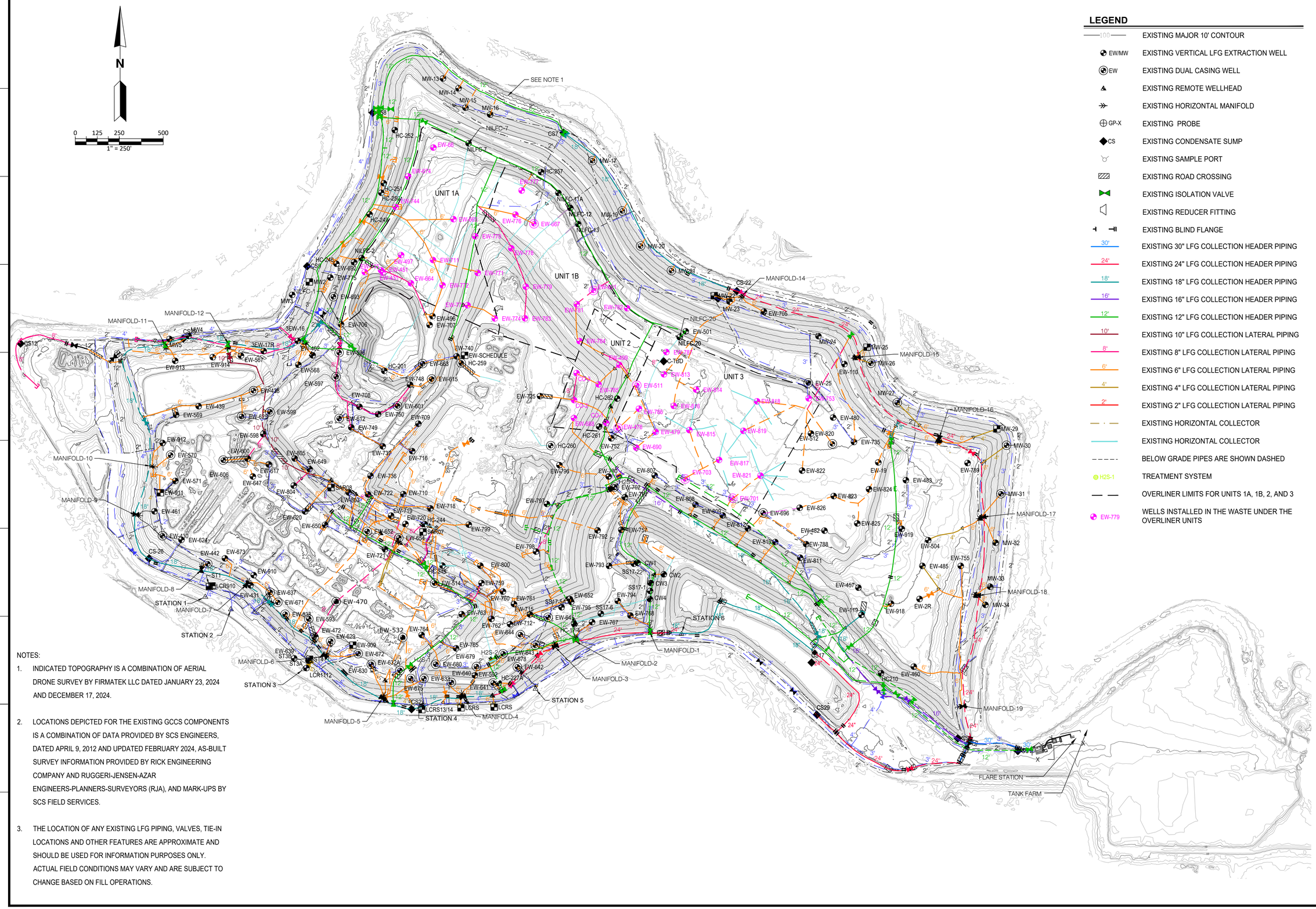
02/24/2025

Date

Enrique Perez

Name of Responsible Official

Appendix B – Existing GCCS Layout



LEGEND

- EXISTING MAJOR 10' CONTOUR
- EW/MW — EXISTING VERTICAL LFG EXTRACTION WELL
- EW — EXISTING DUAL CASING WELL
- EXISTING REMOTE WELLHEAD
- EXISTING HORIZONTAL MANIFOLD
- GP-X — EXISTING PROBE
- CS — EXISTING CONDENSATE SUMP
- EXISTING SAMPLE PORT
- EXISTING ROAD CROSSING
- EXISTING ISOLATION VALVE
- EXISTING REDUCER FITTING
- EXISTING BLIND FLANGE
- 30" — EXISTING 30" LFG COLLECTION HEADER PIPING
- 24" — EXISTING 24" LFG COLLECTION HEADER PIPING
- 18" — EXISTING 18" LFG COLLECTION HEADER PIPING
- 16" — EXISTING 16" LFG COLLECTION HEADER PIPING
- 12" — EXISTING 12" LFG COLLECTION HEADER PIPING
- 10" — EXISTING 10" LFG COLLECTION LATERAL PIPING
- 8" — EXISTING 8" LFG COLLECTION LATERAL PIPING
- 6" — EXISTING 6" LFG COLLECTION LATERAL PIPING
- 4" — EXISTING 4" LFG COLLECTION LATERAL PIPING
- 2" — EXISTING 2" LFG COLLECTION LATERAL PIPING
- EXISTING HORIZONTAL COLLECTOR
- EXISTING HORIZONTAL COLLECTOR
- BELOW GRADE PIPES ARE SHOWN DASHED
- H2S-1 — TREATMENT SYSTEM
- OVERLINER LIMITS FOR UNITS 1A, 1B, 2, AND 3
- EW-779 — WELLS INSTALLED IN THE WASTE UNDER THE OVERLINER UNITS

NOTES:

1. INDICATED TOPOGRAPHY IS A COMBINATION OF AERIAL DRONE SURVEY BY FIRMATEK LLC DATED JANUARY 23, 2024 AND DECEMBER 17, 2024.
2. LOCATIONS DEPICTED FOR THE EXISTING GCCS COMPONENTS IS A COMBINATION OF DATA PROVIDED BY SCS ENGINEERS, DATED APRIL 9, 2012 AND UPDATED FEBRUARY 2024, AS-BUILT SURVEY INFORMATION PROVIDED BY RICK ENGINEERING COMPANY AND RUGGERI-JENSEN-AZAR ENGINEERS-PLANNERS-SURVEYORS (RJA), AND MARK-UPS BY SCS FIELD SERVICES.
3. THE LOCATION OF ANY EXISTING LFG PIPING, VALVES, TIE-IN LOCATIONS AND OTHER FEATURES ARE APPROXIMATE AND SHOULD BE USED FOR INFORMATION PURPOSES ONLY. ACTUAL FIELD CONDITIONS MAY VARY AND ARE SUBJECT TO CHANGE BASED ON FILL OPERATIONS.

DATE
REVISION
NO.

SHEET TITLE: 2024-2025 EXISTING GCCS PLAN

PROJECT TITLE: NEWBY ISLAND LANDFILL MILPITAS, CALIFORNIA

CLIENT:

SCS ENGINEERS
ENVIRONMENTAL CONSULTANTS
8799 BALBOA AVENUE SUITE 290
SAN DIEGO, CA 92123
(858) 571-5500 FAX. (562) 427-0805

ACAD FILE: \NEWBY\BASBUILT MASTERS\
DWN. BY: ISR
CHK. BY:
APP. BY:
PROJ. NO.
DSN. BY:

DATE: 01/24/2025

SCALE: AS SHOWN

SHEET: 1

\\PLE-FS01\Data\CAD\ASBUILT - MASTERS\Newby Island\GCCS As-Built\2025\NEWBY LF GCCS LAYOUT ASBUILT SITE UPDATE_1-24 isr.dwg Jan 24, 2025 - 1:1pm By: 4969sr

Appendix C – Surface Emission and GCCS Component Leak Monitoring Results

December 2, 2024
File No. 07221077.00

Mr. Jon Freedman
Republic Services – Newby Island Landfill
1601 Dixon Landing Road
Milpitas, California 95035

Subject: Newby Island Landfill - Milpitas, California

Landfill Methane Rule (LMR) and New Source Performance Standards (NSPS) Surface Emissions Monitoring for Third Quarter 2024.

Dear Mr. Freedman:

SCS Field Services (SCS) is pleased to provide the Republic Services, with the enclosed report summarizing the surface emissions monitoring services provided at the Newby Island Landfill (Site) during the Third Quarter of 2024. This report includes the results of the surface scan, component emissions, and blower/flare station emissions monitoring for the Site for this monitoring period.

SCS appreciates the opportunity to be of assistance to Republic Services on this project. As you review the enclosed information, please contact Sean Bass at (209) 345-2458 or Whitney Stackhouse at (209) 338-7990 if you have any questions or comments.

Sincerely,

Whitney Stackhouse
Project Manager
SCS Field Services

Sean T. Bass
Senior Project Manager
SCS Field Services

Encl.

Newby Island Landfill, LMR/NSPS SEM, Third Quarter 2024

Newby Island Landfill

Landfill Methane Rule (LMR) and New Source Performance Standards (NSPS) Surface Emissions Monitoring

Third Quarter 2024

Presented to:

Mr. Jon Freedman
Republic Services – Newby Island
1601 Dixon Landing Road
Milpitas, California 95035

SCS FIELD SERVICES

File No. 07221077.00 Task 01 | December 2, 2024,

SCS FIELD SERVICES
4730 Enterprise Way Suite A
Modesto, CA 95356

Newby Island Landfill

Landfill Methane Rule (LMR) and New Source Performance Standards (NSPS) Surface Emissions Monitoring Third Quarter 2024

INTRODUCTION

This letter provides results of the September 23, 24, 25, 26, and October 3, 11, and 24, 2024, LMR and NSPS landfill surface emissions monitoring (SEM) performed by SCS Field Services (SCS) at the subject site. All work was performed in accordance with our approved Work Scope dated December 23, 2020, and the LMR requirements.

SUMMARY AND CONCLUSIONS

As stipulated in LMR, if uncorrectable exceedances within the 10-day limitation are detected or emissions are discovered during an inspection by Regulatory Agencies, the landfill must perform monitoring on a 25-foot pathway on a quarterly basis for active disposal sites. Upon completion of four consecutive SEM events without an uncorrectable exceedance of the 25 ppmv or 500 ppmv standards, other than non-repeatable momentary readings, the landfill may perform the monitoring on a 100-foot spacing on an annual basis for closed landfills or quarterly for active disposal sites. Therefore, based on the previous monitoring events, in which exceedances were observed, the monitoring at the Newby Island Landfill was performed on 25-foot pathways in accordance with the LMR.

On September 23, 24, 25, and 26, 2024, SCS performed the third quarter of 2024 SEM as required by the Bay Area Air Quality Management District (BAAQMD). Instantaneous surface emissions monitoring results indicated that fifty-eight (58) locations exceeded the 500 ppmv maximum concentration during the initial monitoring event (Table 1 in Attachment 3). These results are discussed in a subsequent section of this report.

Also, during the instantaneous monitoring event, SCS performed concurrent integrated monitoring of the landfill surface. As required by the LMR, the landfill was divided into 50,000 square foot areas. The Newby Island Landfill surface area was therefore divided into 277 grids, as shown in Figure 1 in Attachment 1. During this monitoring event, several grids were not monitored, per the regulations, due to ongoing active landfilling activities, unsafe conditions, or there was no waste in place before the monitoring event.

During the monitoring event, there were fourty-eight (48) grid areas observed to exceed the 25 ppmv LMR integrated average threshold (Table 2 in Attachment 4). These results are discussed in a subsequent section of this report.

In addition to surface monitoring, quarterly monitoring was conducted at the pressurized piping or components of the Gas Collection and Control System (GCCS) that are under positive pressure. Results of the testing of the landfill gas (LFG) Blower Flare Station (BFS) pressurized pipe and

components indicated no exceedances of the LMR 500-ppmv limit or the BAAQMD 1,000-ppmv limit. Results are shown in Attachment 3 (Table 1).

Further, as required under the LMR, any location on the landfill that has an observed instantaneous methane concentration above 200 ppmv, must be stake-marked and Global Positioning System (GPS) located on a site figure. During this reporting period, twenty (20) locations were observed to exceed the 200 ppmv, reporting threshold. When these readings are observed, the locations are reported to site personnel for tracking and/or remediation and will be reported in the next submittal of the annual LMR report.

Finally, to help prevent potential future exceedances, SCS recommends that the landfill surface be routinely inspected and any observed surface erosion be routinely repaired.

BACKGROUND

The Newby Island Landfill is an active organic refuse disposal site. By way of background, organic materials buried in a landfill decompose anaerobically (in the absence of oxygen) producing a combustible gas that contains approximately 50 to 60 percent methane gas, 40 to 50 percent carbon dioxide, and a trace amount of various other gases, some of which are odorous. The Newby Island property contains a system to control the combustible gases generated in the landfill.

SURFACE EMISSIONS MONITORING

On September 23, 24, 25, 26, and October 3, 11, and 24, 2024, the instantaneous and integrated SEM was performed over the surface of the subject site. The monitoring intended to identify any specific locations or areas of the landfill surface with organic compound concentrations exceeding the LMR threshold limit values of 500 ppmv measured as methane for instantaneous monitoring, or an average methane concentration of 25 ppmv for the integrated monitoring in the 50,000 square foot grids as required under the LMR. During this event, SCS performed the monitoring on a 25-foot pathway in accordance with the rules as required.

EMISSIONS TESTING INSTRUMENTATION/CALIBRATION

The instruments used to perform the landfill surface emission testing consisted of the following:

- Thermo Scientific TVA 2020 portable Flame Ionization Detector (FID). This instrument measures methane in the air over a range of 1 to 50,000 ppmv. The TVA 2020 meets the State of California Air Resources Board (CARB) requirements for combined instantaneous and integrated monitoring and was calibrated in accordance with the United States Environmental Protection Agency (US EPA) Method 21.

- Weather Anemometer with continuous recorder for meteorological conditions in accordance with the LMR.

Instrument calibration logs and weather information are shown in Attachments 5 and 6.

SURFACE EMISSIONS MONITORING PROCEDURES

Surface emissions monitoring was conducted in accordance with the LMR and NSPS requirements. Monitoring was performed with the FID inlet held within 3 inches of the landfill surface while a technician walked a grid in parallel paths not more than 25 -feet apart over the landfill's surface.

Cracks, holes, and other cover penetrations in the surface were also tested. Surface emissions readings were monitored continuously and recorded every 5 seconds. Any areas exceeding the 200 or 500 ppmv standards (reporting and compliance levels, respectively) would be GPS-tagged and stake-marked for on-site personnel to perform remediation or repairs.

The integrated average is based on the readings stored on the instrument, which are recorded every 5 seconds. The readings are then downloaded and the averages are calculated for each grid using SCS eTools®. All readings are maintained in this secure SCS Database. The readings are not provided in the report due to the volume of readings but can be furnished upon request.

Recorded wind speed results are shown in Attachment 6. Wind speed averages were observed to remain below the alternative threshold of 10 miles per hour, and no instantaneous speeds exceeded 20 miles per hour. No rainfall occurred within 72 hours of the monitoring events. Therefore, site meteorological conditions were within the alternatives of the LMR requirements on the above-mentioned dates.

TESTING RESULTS

During this event, SCS performed the monitoring on a 25-foot pathway in accordance with the rule as required under the LMR and NSPS. The monitoring intended to identify any specific locations or areas of the landfill surface with organic compound concentrations exceeding the LMR or NSPS threshold limit values of 500 ppmv measured as methane for instantaneous monitoring, or an average methane concentration of 25 ppmv for the integrated monitoring (LMR).

On September 23, 24, 25, and 26, 2024, SCS performed the third quarter of 2024 instantaneous emissions monitoring testing as required by the BAAQMD. During this monitoring, surface emissions results indicated that fifty-eight (58) locations exceeded the 500 ppmv maximum concentration. The required first and second 10-day (LMR/NSPS) and 30-day (NSPS) follow-up monitoring performed on October 3, 11, and 24, 2024, indicated that not all locations returned below compliance limits as required, following system adjustments and remediation (wellfield adjustment and borehole repairs using bentonite and soil) performed by SCS and site personnel. Based on these monitoring results, and in accordance with NSPS, the site is required to perform a system expansion within 120 days of the initial detected exceedance or January 22, 2025. Results of the initial and follow-up monitoring are shown in Attachment 3 (Table 1). Calibration logs for the monitoring equipment are provided in Attachment 5.

Additionally, calculated integrated grid monitoring indicated fourty-eight (48) integrated exceedances of the 25-ppmv requirement on September 23, 24, 25, and 26, 2024. The required first and second 10-day LMR follow-up monitoring performed on October 3, and 11, 2024, indicated that not all areas had returned to compliance following system adjustments and remediation by site personnel. In accordance with LMR requirements for expansion and remediation, the exceedance locations need to be remediated and returned to compliance in accordance with the rule (expansion of the collection system or an alternative compliance option if approved by the BAAQMD) within 120 days of the third observed integrated exceedance, which will be due by February 8, 2025. However since the NSPS regulation is from the initial exceedance, we will be using the January 22, 2025, due date for expansion. The initial and follow-up monitoring results are shown in Attachment 4, Table 2. Calibration logs for the monitoring equipment are provided in Attachment 5.

During this monitoring event, several grids were not monitored, in accordance with the LMR, due to active landfilling activities, unsafe conditions, or no waste in place. SCS will continue to monitor all accessible locations during the fourth quarter of 2024.

PRESSURIZED PIPE AND COMPONENT LEAK MONITORING

On September 23, 2024, quarterly component leak monitoring was performed in accordance with the LMR. SCS performed LFG pressurized pipe and component leak monitoring at the BFS. Monitoring was performed with the detector inlet held one-half of an inch from the pressurized pipe and associated components. No locations exceeding the 500-ppmv limit were observed during this monitoring event. The maximum reading, which was 64.90 ppmv, was below the limit as shown in Table 1 provided in Attachment 3. Therefore, all pressurized pipes and components located at the LFG BFS were in compliance at the time of our testing.

PROJECT SCHEDULE

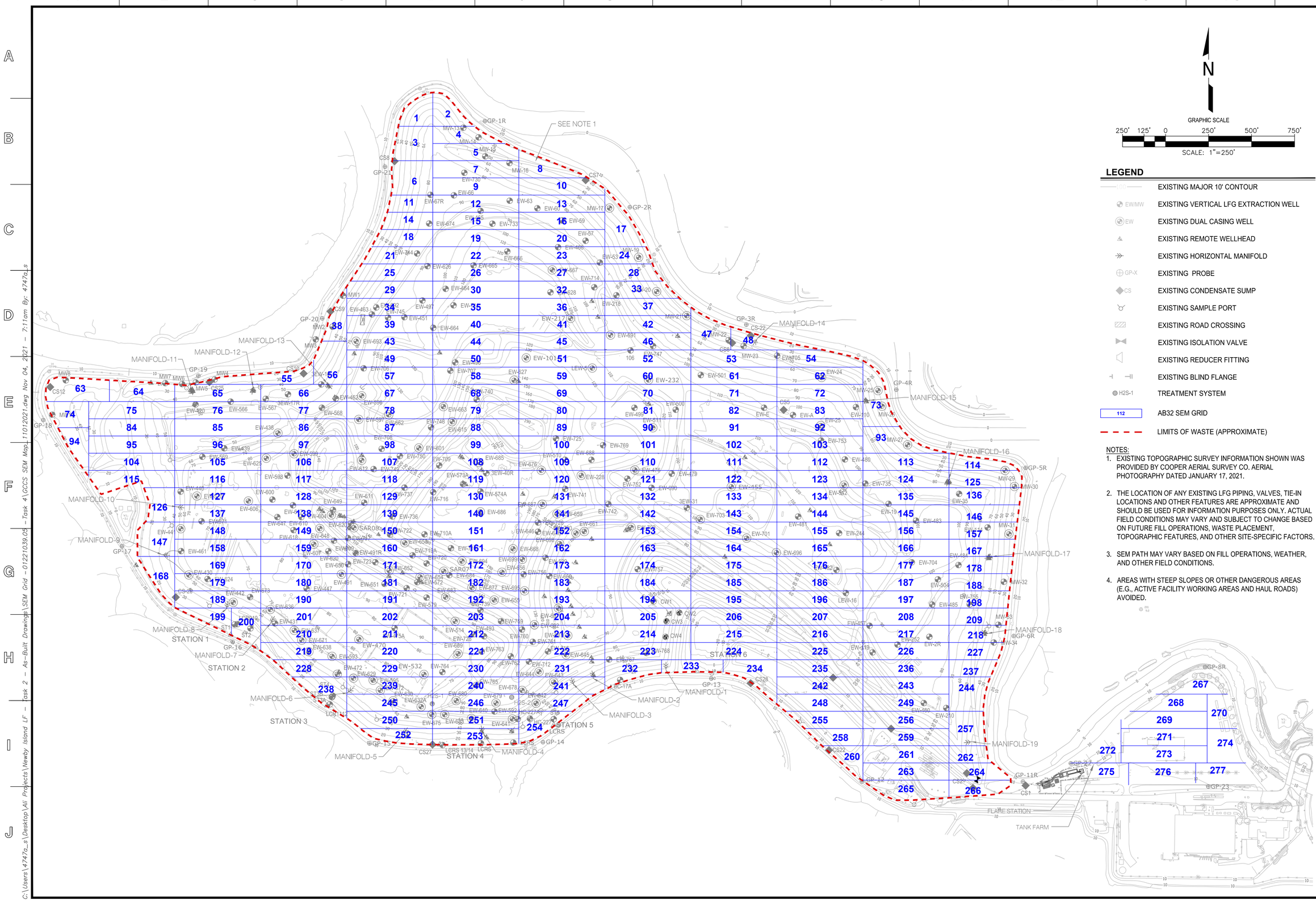
According to the LMR and NSPS, surface emissions monitoring at active landfills is required to be performed on a quarterly basis. Therefore, in accordance with our approved Work Scope, the fourth quarter 2024 (October through December) surface emissions testing event is scheduled to be performed by the end of December 2024 in accordance with the Republic SOP unless an alternative timeline is requested by site personnel.

STANDARD PROVISIONS

This report addresses the conditions of the subject site during the testing dates only. Accordingly, we assume no responsibility for any changes that may occur subsequent to our testing which could affect the surface emissions at the subject site or adjacent properties.

Attachment 1

Landfill Grid



N

GRAPHIC SCALE

250' 125' 0 250' 500' 750'

SCALE: 1"=250'

LEGEND

- EXISTING MAJOR 10' CONTOUR
- EW/MW — EXISTING VERTICAL LFG EXTRACTION WELL
- EW — EXISTING DUAL CASING WELL
- EXISTING REMOTE WELLHEAD
- EXISTING HORIZONTAL MANIFOLD
- GP-X — EXISTING PROBE
- CS — EXISTING CONDENSATE SUMP
- EXISTING SAMPLE PORT
- EXISTING ROAD CROSSING
- EXISTING ISOLATION VALVE
- EXISTING REDUCER FITTING
- EXISTING BLIND FLANGE
- H2S-1 — TREATMENT SYSTEM
- 112 — AB32 SEM GRID
- LIMITS OF WASTE (APPROXIMATE)

NOTES:

1. EXISTING TOPOGRAPHIC SURVEY INFORMATION SHOWN WAS PROVIDED BY COOPER AERIAL SURVEY CO. AERIAL PHOTOGRAPHY DATED JANUARY 17, 2021.
2. THE LOCATION OF ANY EXISTING LFG PIPING, VALVES, TIE-IN LOCATIONS AND OTHER FEATURES ARE APPROXIMATE AND SHOULD BE USED FOR INFORMATION PURPOSES ONLY. ACTUAL FIELD CONDITIONS MAY VARY AND SUBJECT TO CHANGE BASED ON FUTURE FILL OPERATIONS, WASTE PLACEMENT, TOPOGRAPHIC FEATURES, AND OTHER SITE-SPECIFIC FACTORS.
3. SEM PATH MAY VARY BASED ON FILL OPERATIONS, WEATHER, AND OTHER FIELD CONDITIONS.
4. AREAS WITH STEEP SLOPES OR OTHER DANGEROUS AREAS (E.G., ACTIVE FACILITY WORKING AREAS AND HAUL ROADS) AVOIDED.

DATE

REVISION

NO.

SHEET TITLE: GCCS SEM MAP

PROJECT TITLE: NEWBY ISLAND LANDFILL MILPITAS, CALIFORNIA

CLIENT:

SCS ENGINEERS
ENVIRONMENTAL CONSULTANTS
4683 CHABOT DRIVE SUITE 200
PLEASANTON, CA 94588
(925)426-0080

PROJ. NO: 01221039.05 T4

DSN. BY: AAS

DWN. BY: AAS

CHK. BY: MD

APP. BY: MD

ACAD FILE: ENGINEERS

DATE: 11-04-21

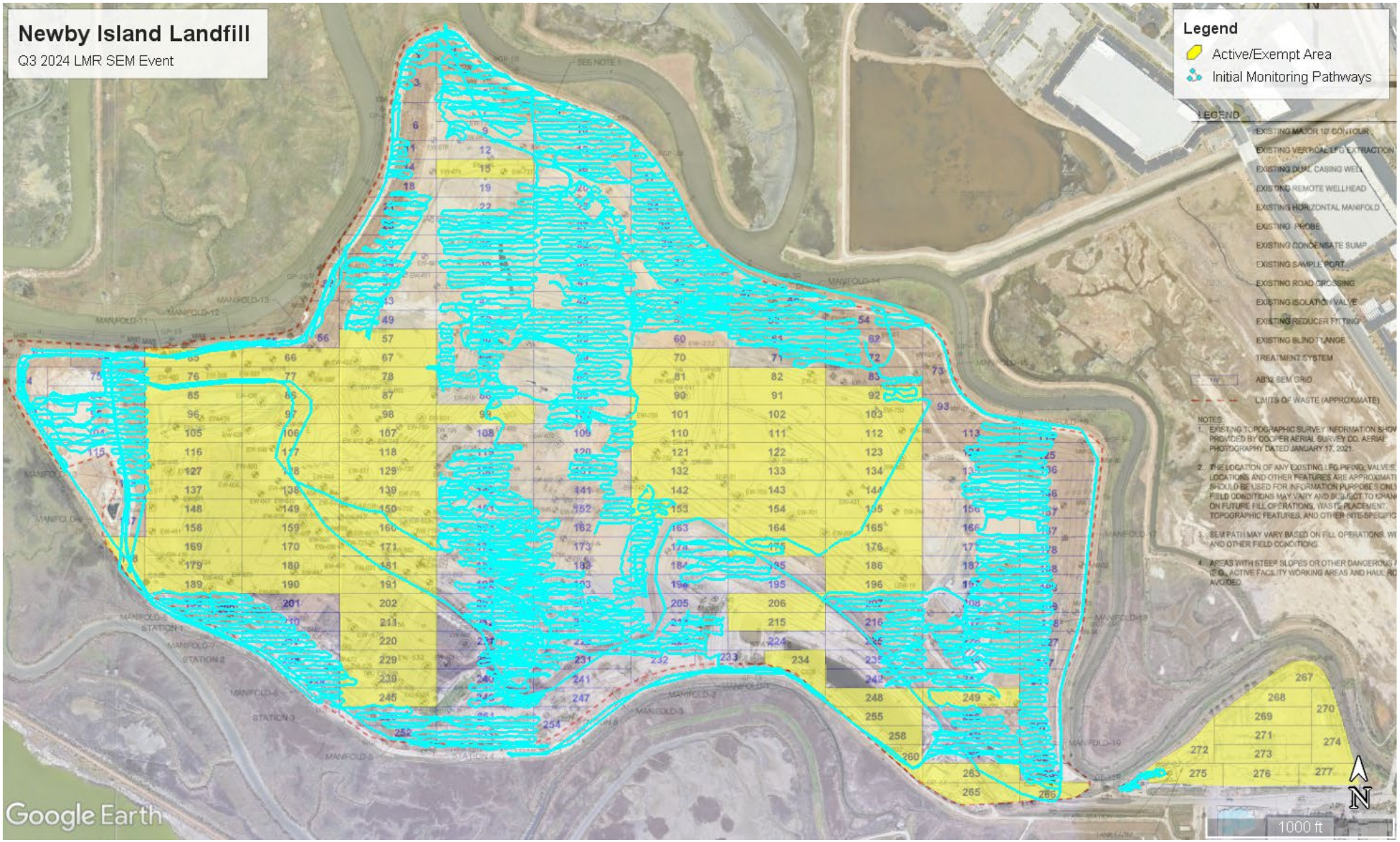
SCALE: AS SHOWN

SHEET: 1

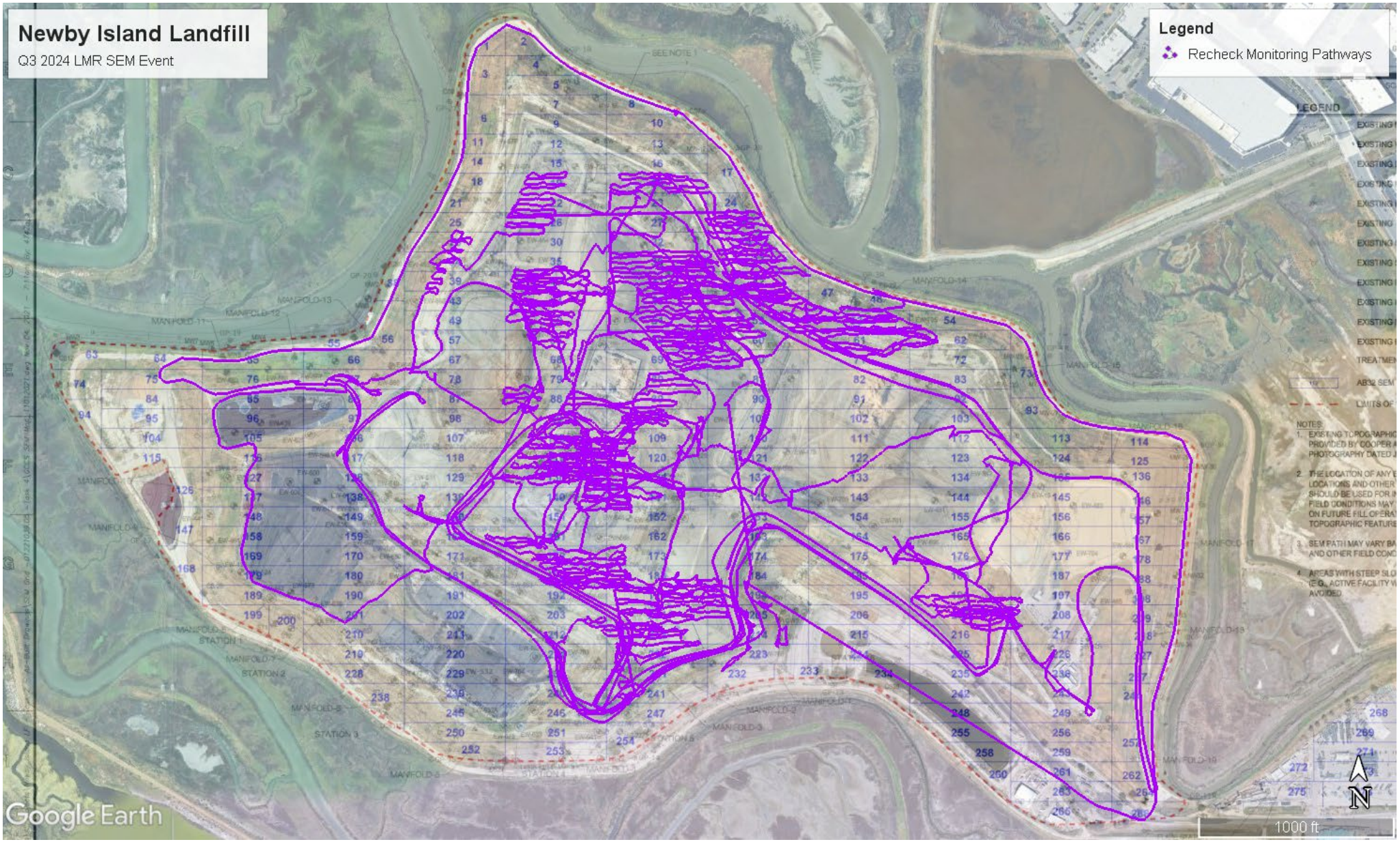
C:\Users\4747a_s\Desktop\All Projects\Newby Island LF - Task 2 - As-Built Drawings\SEM Grid - 01221039.05 - Task 4\GCCS SEM Map_11012021.dwg Nov 04, 2021 - 7:11am By: 4747a_s

Attachment 2

Surface Pathway



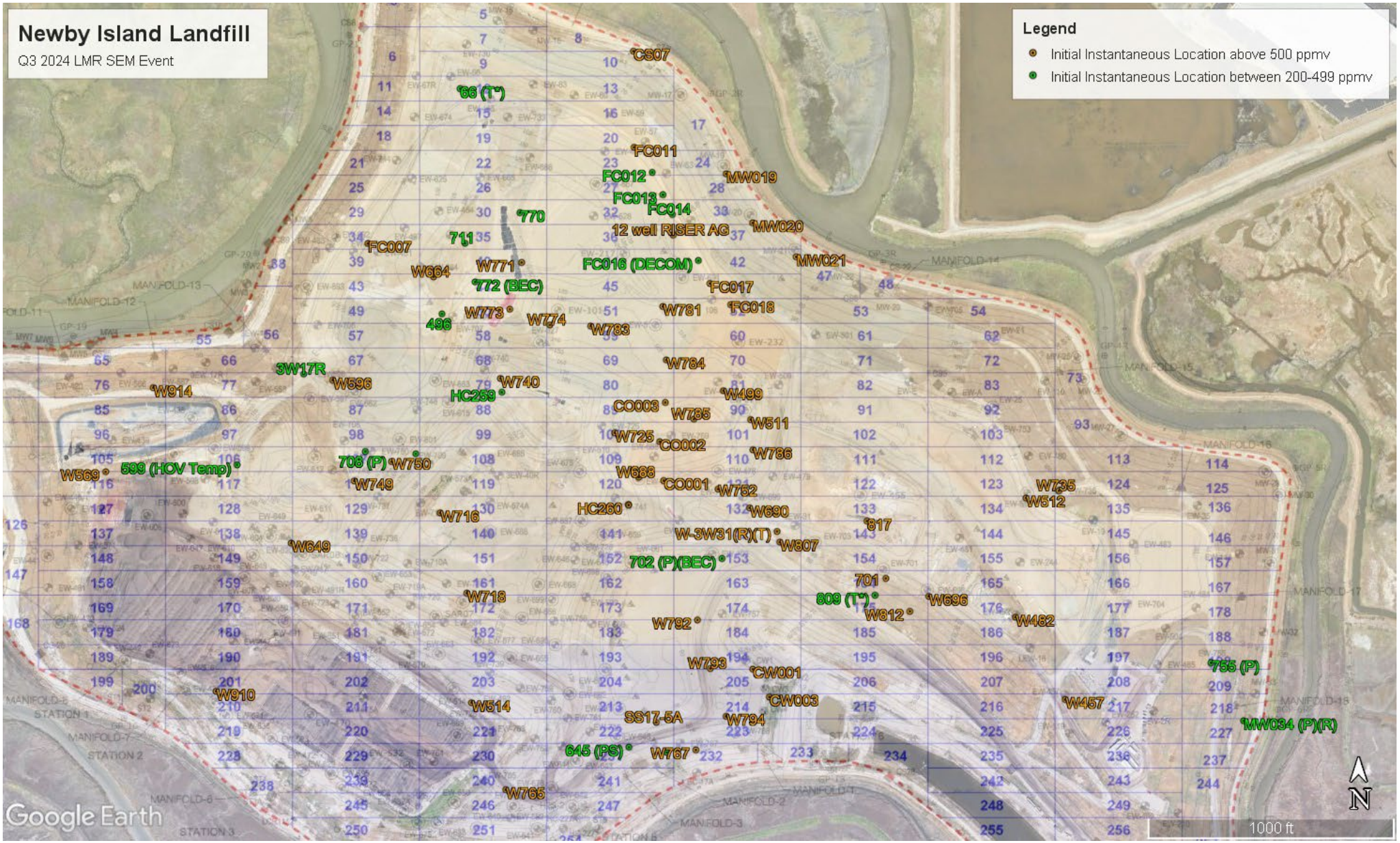
Third Quarter 2024
LMR Surface Emissions Monitoring Pathway
Newby Island Landfill, Milpitas, California



Third Quarter 2024
LMR Surface Emissions Monitoring First and Second 10-Day Pathways
Newby Island Landfill, Milpitas, California

Attachment 3

Instantaneous and Component Emissions Monitoring Results



Third Quarter 2024
Initial Emissions Monitoring Locations Greater Than 200 and 500 ppmv
Newby Island Landfill Milpitas, California

Third Quarter 2024

Table 1. LMR Instantaneous Surface and Component Emissions Monitoring Results

Newby Island Sanitary Landfill, Milpitas, California

Instantaneous Data Report for September 23, 24, and October 3, 11, and 24, 2024

Location (Surface)	Initial Monitoring Results (ppmv) September 24, 2024	First 10-Day Monitoring Results (ppmv) October 3, 2024	Second 10-Day Monitoring Results (ppmv) October 11, 2024	30-Day Monitoring Results (ppmv) October 24, 2024	120-Day Expansion Due:	Latitude	Longitude
701	1,344	Active	Active	Active	N/A	37.458580	-121.938550
W817	555	Active	Active	Active	N/A	37.459215	-121.938814
12 well RISER AG	34,900	77,900	22,400	330	**1/22/2025**	37.462384	-121.941522
CO001	1,557	877	120	1250	N/A	37.459663	-121.941654
CO002	506	1,210	375	17,000	**1/22/2025**	37.460095	-121.941711
CO003	894	2,130	449	24,000	**1/22/2025**	37.460529	-121.941632
CS07	8,004	2,367	475	6000	**1/22/2025**	37.464421	-121.942078
CW001	765	18.5	N/A	4.2	N/A	37.457574	-121.940410
CW003	817	9.5	N/A	4.2	N/A	37.457266	-121.940178
FC007	1,051	2,008	1,334	342	**1/22/2025**	37.462291	-121.945790

Third Quarter 2024

Table 1. LMR Instantaneous Surface and Component Emissions Monitoring Results

Newby Island Sanitary Landfill, Milpitas, California

Location (Surface)	Initial Monitoring Results (ppmv) September 24, 2024	First 10-Day Monitoring Results (ppmv) October 3, 2024	Second 10-Day Monitoring Results (ppmv) October 11, 2024	30-Day Monitoring Results (ppmv) October 24, 2024	120-Day Expansion Due:	Latitude	Longitude
FC011	932	1,521	80,000	416	**1/22/2025**	37.463356	-121.942069
FC017	3,792	271	N/A	430	N/A	37.461847	-121.941009
FC018	2,375	107	N/A	424	N/A	37.461612	-121.940718
HC260	4,000	782	759	1241	**1/22/2025**	37.459392	-121.942144
MW019	617	2,168	1,045	56.4	**1/22/2025**	37.463062	-121.940782
MW020	1,361	3,808	143	74.3	N/A	37.462519	-121.940412
MW021	2,386	22.9	N/A	31.6	N/A	37.462142	-121.939803
NO WELL ID DNR AG	1,340	661	2,078	14,000	**1/22/2025**	37.459399	-121.942148
SS17-5A	3,606	68.7	N/A	3,143	N/A	37.456984	-121.941758
W-3W31(R)(T)	2,296	60,000	10,000	21,000	**1/22/2025**	37.459100	-121.940070
W457	1,197	1,297	929	7,841	**1/22/2025**	37.457238	-121.936045

Third Quarter 2024

Table 1. LMR Instantaneous Surface and Component Emissions Monitoring Results

Newby Island Sanitary Landfill, Milpitas, California

Location (Surface)	Initial Monitoring Results (ppmv) September 24, 2024	First 10-Day Monitoring Results (ppmv) October 3, 2024	Second 10-Day Monitoring Results (ppmv) October 11, 2024	30-Day Monitoring Results (ppmv) October 24, 2024	120-Day Expansion Due:	Latitude	Longitude
W482	28,600	4,324	22,000	7,987	**1/22/2025**	37.458150	-121.936740
W499	2,166	780	120	6143	N/A	37.460659	-121.940820
W511	790	Active	Active	Active	N/A	37.460339	-121.940440
W512	6,748	104	N/A	9,404	N/A	37.459470	-121.936593
W514	21,900	16	N/A	194	N/A	37.457202	-121.944340
W569	731	753	80.2	121	**1/22/2025**	37.459761	-121.949452
W596	19,600	46,700	1,496	225	**1/22/2025**	37.460777	-121.946279
W649	21,600	179	N/A	Active	N/A	37.458970	-121.946860
W664	5,871	19,600	2,498	32,300	**1/22/2025**	37.461920	-121.944870
W688	1,303	9,000	10,100	17,000	**1/22/2025**	37.459700	-121.942003
W690	2,636	1,407	70,700	17,000	**1/22/2025**	37.459360	-121.940453
W696	1,972	1,255	960	62,600	**1/22/2025**	37.458380	-121.937950

Third Quarter 2024

Table 1. LMR Instantaneous Surface and Component Emissions Monitoring Results

Newby Island Sanitary Landfill, Milpitas, California

Location (Surface)	Initial Monitoring Results (ppmv) September 24, 2024	First 10-Day Monitoring Results (ppmv) October 3, 2024	Second 10-Day Monitoring Results (ppmv) October 11, 2024	30-Day Monitoring Results (ppmv) October 24, 2024	120-Day Expansion Due:	Latitude	Longitude
W716	796	376	N/A	147	N/A	37.459305	-121.944780
W718	1,017	546	1,608	169	**1/22/2025**	37.458416	-121.944406
W725	1,114	10,000	1,404	37,000	**1/22/2025**	37.460193	-121.942339
W735	1,313	1,475	56.7	7.9	N/A	37.459550	-121.936132
W740	855	67,800	1,322	358	**1/22/2025**	37.460795	-121.943938
W749	4,665	Active	Active	Active	N/A	37.459660	-121.945979
W750	1,620	Active	Active	Active	N/A	37.459874	-121.945459
W752	6,141	2,365	16,500	17,000	**1/22/2025**	37.459569	-121.940896
W765	24,500	20.7	N/A	97.3	N/A	37.456238	-121.943862
W767	4,766	1,198	114	4,864	**1/22/2025**	37.456679	-121.941205
W771	1,125	928	874	22,000	**1/22/2025**	37.462080	-121.943639
W773	10,300	704	1.08	88,000	**1/22/2025**	37.461562	-121.943805

Third Quarter 2024

Table 1. LMR Instantaneous Surface and Component Emissions Monitoring Results

Newby Island Sanitary Landfill, Milpitas, California

Location (Surface)	Initial Monitoring Results (ppmv) September 24, 2024	First 10-Day Monitoring Results (ppmv) October 3, 2024	Second 10-Day Monitoring Results (ppmv) October 11, 2024	30-Day Monitoring Results (ppmv) October 24, 2024	120-Day Expansion Due:	Latitude	Longitude
W774	1,191	1,191	2,114	5000	**1/22/2025**	37.461388	-121.943246
W781	9,448	51,400	249	146	N/A	37.461592	-121.941667
W783	839	2,359	618	391	**1/22/2025**	37.461375	-121.942675
W784	575	4,859	8,896	30,000	**1/22/2025**	37.461000	-121.941619
W785	3,562	116	N/A	46,000	N/A	37.460345	-121.941233
W786	2,280	Active	Active	Active	N/A	37.460004	-121.940408
W792	829	55.4	N/A	457	N/A	37.458119	-121.941183
W793	7,921	103	N/A	120	N/A	37.457581	-121.941004
W794	1,838	5,467	59.4	3,008	**1/22/2025**	37.457051	-121.940782
W807	19,200	70,000	24,100	87,000	**1/22/2025**	37.458982	-121.940033
W812	1,367	1,388	654	427	**1/22/2025**	37.458214	-121.938215
W910	1,124	1,094	42.4	75.9	N/A	37.457328	-121.947911

Third Quarter 2024

Table 1. LMR Instantaneous Surface and Component Emissions Monitoring Results

Newby Island Sanitary Landfill, Milpitas, California

Location (Surface)	Initial Monitoring Results (ppmv) September 24, 2024	First 10-Day Monitoring Results (ppmv) October 3, 2024	Second 10-Day Monitoring Results (ppmv) October 11, 2024	30-Day Monitoring Results (ppmv) October 24, 2024	120-Day Expansion Due:	Latitude	Longitude
W914	925	548	548	9,672	**1/22/2025**	37.460692	-121.948787
496	297	N/A	N/A	N/A	N/A	37.461510	-121.944753
7704	379	N/A	N/A	N/A	N/A	37.462631	-121.943664
71115	298	N/A	N/A	N/A	N/A	37.462293	-121.944431
3W17R	214	N/A	N/A	N/A	N/A	37.460844	-121.946685
599 (HOV Temp)	440	N/A	N/A	N/A	N/A	37.459837	-121.947616
601 (P) (HOV Temp)	308	N/A	N/A	N/A	N/A	37.459960	-121.945119
645 (PS)	413	N/A	N/A	N/A	N/A	37.456710	-121.942140
66 (T*)	225	N/A	N/A	N/A	N/A	37.464005	-121.944500
702 (P)(BEC)	252	N/A	N/A	N/A	N/A	37.458800	-121.940840
708 (P)	470	N/A	N/A	N/A	N/A	37.459985	-121.945825

Third Quarter 2024

Table 1. LMR Instantaneous Surface and Component Emissions Monitoring Results

Newby Island Sanitary Landfill, Milpitas, California

Location (Surface)	Initial Monitoring Results (ppmv) September 24, 2024	First 10-Day Monitoring Results (ppmv) October 3, 2024	Second 10-Day Monitoring Results (ppmv) October 11, 2024	30-Day Monitoring Results (ppmv) October 24, 2024	120-Day Expansion Due:	Latitude	Longitude
755 (P)7	333	N/A	N/A	N/A	N/A	37.457645	-121.934005
772 (BEC)	287	N/A	N/A	N/A	N/A	37.461864	-121.944290
809 (T*)	206	N/A	N/A	N/A	N/A	37.458393	-121.938701
FC012	476	N/A	N/A	N/A	N/A	37.463078	-121.941815
FC013	222	N/A	N/A	N/A	N/A	37.462831	-121.941665
FC014	371	N/A	N/A	N/A	N/A	37.462612	-121.941533
FC016	350	N/A	N/A	N/A	N/A	37.462102	-121.941170
HC259	335	N/A	N/A	N/A	N/A	37.460643	-121.943916
MW034 (P)(R)	357	N/A	N/A	N/A	N/A	37.457001	-121.933552
SS17-68	211	N/A	N/A	N/A	N/A	37.456651	-121.94161

Third Quarter 2024

Table 1. LMR Instantaneous Surface and Component Emissions Monitoring Results

Newby Island Sanitary Landfill, Milpitas, California

Pressurized Pipe

Location	Monitoring Date	Monitoring Results (ppmv)	Latitude	Latitude
Flare Station	September 23, 2024	64.90	37.455070	-121.950284

No other exceedances of the 500-ppm threshold were observed during the LMR/NSPS monitoring performed during the third quarter of 2024.

Attachment 4

Integrated Monitoring Results

Third Quarter 2024
Table 2. Integrated Surface Emissions Monitoring Results
Newby Island Landfill, Milpitas, California

Point Name	Record Date	FID Concentration (ppm)	Comments
NIL-001	9/26/2024	2.58	
NIL-002	9/26/2024	2.46	
NIL-003	9/26/2024	3.65	
NIL-004	9/26/2024	3.10	
NIL-005	9/26/2024	2.67	
NIL-006	9/26/2024	2.04	
NIL-007	9/26/2024	4.20	
NIL-008	9/25/2024	10.87	
NIL-009	9/26/2024	6.11	
NIL-010	9/25/2024	17.29	
NIL-011	9/26/2024	11.80	
NIL-012	9/26/2024	21.88	
NIL-013	9/25/2024	17.43	
NIL-014	9/26/2024	24.38	
NIL-015	--	--	Active/Exempt Grid Area
NIL-016	9/26/2024	19.72	
NIL-017	9/25/2024	7.40	
NIL-018	9/25/2024	13.98	
NIL-019	9/26/2024	56.67	Initial Monitoring
NIL-019	10/3/2024	34.53	First 10-Day Recheck
NIL-019	10/11/2024	24.30	Second 10-Day Recheck
NIL-020	9/26/2024	30.63	Initial Monitoring
NIL-020	10/3/2024	37.39	First 10-Day Recheck
NIL-020	10/11/2024	53.27	Second 10-Day Recheck Expansion due by January 22, 2025
NIL-021	9/25/2024	11.32	
NIL-022	9/26/2024	25.20	Initial Monitoring
NIL-022	10/3/2024	19.69	First 10-Day Recheck
NIL-023	9/26/2024	22.64	
NIL-024	9/25/2024	14.06	
NIL-025	9/25/2024	19.37	
NIL-026	9/26/2024	26.53	Initial Monitoring
NIL-026	10/3/2024	23.58	First 10-Day Recheck
NIL-027	9/26/2024	26.66	Initial Monitoring
NIL-027	10/3/2024	21.14	First 10-Day Recheck
NIL-028	9/25/2024	30.77	Initial Monitoring
NIL-028	10/3/2024	37.58	First 10-Day Recheck
NIL-028	10/11/2024	24.33	Second 10-Day Recheck
NIL-029	9/25/2024	34.18	Initial Monitoring
NIL-029	10/3/2024	18.85	First 10-Day Recheck
NIL-030	9/26/2024	16.45	
NIL-032	9/26/2024	34.06	Initial Monitoring
NIL-032	10/3/2024	54.06	First 10-Day Recheck

Third Quarter 2024
Table 2. Integrated Surface Emissions Monitoring Results
Newby Island Landfill, Milpitas, California

Point Name	Record Date	FID Concentration (ppm)	Comments
NIL-032	10/11/2024	--	Active Grid
NIL-033	9/25/2024	28.46	Initial Monitoring
NIL-033	10/3/2024	38.45	First 10-Day Recheck
NIL-033	10/11/2024	44.73	Second 10-Day Recheck Expansion due by January 22, 2025
NIL-034	9/25/2024	36.80	Initial Monitoring
NIL-034	10/3/2024	2.44	First 10-Day Recheck
NIL-035	9/26/2024	23.31	
NIL-036	9/26/2024	38.65	Initial Monitoring
NIL-036	10/3/2024	32.34	First 10-Day Recheck
NIL-036	10/11/2024	20.86	Second 10-Day Recheck
NIL-037	9/25/2024	36.40	Initial Monitoring
NIL-037	10/3/2024	29.40	First 10-Day Recheck
NIL-037	10/11/2024	41.46	Second 10-Day Recheck Expansion due by January 22, 2025
NIL-038	9/25/2024	1.16	
NIL-039	9/25/2024	32.12	Initial Monitoring
NIL-039	10/3/2024	3.68	First 10-Day Recheck
NIL-040	9/26/2024	34.25	Initial Monitoring
NIL-040	10/3/2024	72.58	First 10-Day Recheck
NIL-040	10/11/2024	12.00	Second 10-Day Recheck
NIL-041	9/25/2024	44.43	Initial Monitoring
NIL-041	10/3/2024	25.36	First 10-Day Recheck
NIL-041	10/11/2024	37.65	Second 10-Day Recheck Expansion due by January 22, 2025
NIL-042	9/25/2024	44.32	Initial Monitoring
NIL-042	10/3/2024	61.26	First 10-Day Recheck
NIL-042	10/11/2024	41.89	Second 10-Day Recheck Expansion due by January 22, 2025
NIL-043	9/25/2024	14.56	
NIL-044	9/26/2024	39.54	Initial Monitoring
NIL-044	10/3/2024	54.98	First 10-Day Recheck
NIL-044	10/11/2024	51.85	Second 10-Day Recheck Expansion due by January 22, 2025
NIL-045	9/26/2024	100.19	Initial Monitoring
NIL-045	10/3/2024	108.85	First 10-Day Recheck
NIL-045	10/11/2024	40.02	Second 10-Day Recheck Expansion due by January 22, 2025
NIL-046	9/25/2024	33.18	Initial Monitoring
NIL-046	10/3/2024	30.78	First 10-Day Recheck
NIL-046	10/11/2024	21.23	Second 10-Day Recheck
NIL-047	9/25/2024	12.59	
NIL-048	9/25/2024	14.57	
NIL-049	9/25/2024	23.29	
NIL-050	9/26/2024	50.50	Initial Monitoring
NIL-050	10/3/2024	30.01	First 10-Day Recheck

Third Quarter 2024
Table 2. Integrated Surface Emissions Monitoring Results
Newby Island Landfill, Milpitas, California

Point Name	Record Date	FID Concentration (ppm)	Comments
NIL-050	10/11/2024	50.06	Second 10-Day Recheck Expansion due by January 22, 2025
NIL-051	9/26/2024	35.59	Initial Monitoring
NIL-051	10/3/2024	26.07	First 10-Day Recheck
NIL-051	10/11/2024	12.13	Second 10-Day Recheck
NIL-052	9/25/2024	36.08	Initial Monitoring
NIL-052	10/3/2024	37.87	First 10-Day Recheck
NIL-052	10/11/2024	7.02	Second 10-Day Recheck
NIL-053	9/25/2024	34.43	Initial Monitoring
NIL-053	10/3/2024	30.86	First 10-Day Recheck
NIL-053	10/11/2024	13.68	Second 10-Day Recheck
NIL-054	9/25/2024	10.54	
NIL-055	9/25/2024	5.73	
NIL-056	9/25/2024	5.10	
NIL-057	--	--	Active/Exempt Grid Area
NIL-058	9/26/2024	44.83	Initial Monitoring
NIL-058	10/3/2024	11.60	First 10-Day Recheck
NIL-059	9/26/2024	41.55	Initial Monitoring
NIL-059	10/3/2024	26.68	First 10-Day Recheck
NIL-059	10/11/2024	82.17	Second 10-Day Recheck Expansion due by January 22, 2025
NIL-060	9/25/2024	26.18	Initial Monitoring
NIL-060	10/3/2024	6.09	First 10-Day Recheck
NIL-061	9/25/2024	34.80	Initial Monitoring
NIL-061	10/3/2024	7.24	First 10-Day Recheck
NIL-062	9/25/2024	15.57	
NIL-063	9/25/2024	10.31	
NIL-064	9/25/2024	9.43	
NIL-065	--	--	Active/Exempt Grid Area
NIL-066	--	--	Active/Exempt Grid Area
NIL-067	--	--	Active/Exempt Grid Area
NIL-068	9/25/2024	6.16	
NIL-069	9/26/2024	58.63	Initial Monitoring
NIL-069	10/3/2024	42.32	First 10-Day Recheck
NIL-069	10/11/2024	--	Active Grid
NIL-070	--	--	Active/Exempt Grid Area
NIL-071	9/25/2024	22.28	
NIL-072	9/25/2024	16.65	
NIL-073	9/25/2024	4.23	
NIL-074	9/25/2024	5.57	
NIL-075	9/25/2024	10.96	
NIL-076	--	--	Active/Exempt Grid Area
NIL-077	--	--	Active/Exempt Grid Area
NIL-078	--	--	Active/Exempt Grid Area

Third Quarter 2024
Table 2. Integrated Surface Emissions Monitoring Results
Newby Island Landfill, Milpitas, California

Point Name	Record Date	FID Concentration (ppm)	Comments
NIL-079	9/25/2024	16.81	
NIL-080	9/26/2024	39.19	Initial Monitoring
NIL-080	10/3/2024	62.56	First 10-Day Recheck
NIL-080	10/11/2024	--	Active Grid
NIL-081	--	--	Active/Exempt Grid Area
NIL-082	--	--	Active/Exempt Grid Area
NIL-083	9/25/2024	16.54	
NIL-084	9/25/2024	12.14	
NIL-085	--	--	Active/Exempt Grid Area
NIL-086	--	--	Active/Exempt Grid Area
NIL-087	--	--	Active/Exempt Grid Area
NIL-088	9/25/2024	89.14	Initial Monitoring
NIL-088	10/3/2024	163.43	First 10-Day Recheck
NIL-088	10/11/2024	--	Active Grid
NIL-089	9/26/2024	35.45	Initial Monitoring
NIL-089	10/3/2024	120.03	First 10-Day Recheck
NIL-089	10/11/2024	--	Active Grid
NIL-090	--	--	Active/Exempt Grid Area
NIL-091	--	--	Active/Exempt Grid Area
NIL-092	--	--	Active/Exempt Grid Area
NIL-093	9/25/2024	2.22	
NIL-094	9/25/2024	8.91	
NIL-095	9/25/2024	15.51	
NIL-096	--	--	Active/Exempt Grid Area
NIL-097	--	--	Active/Exempt Grid Area
NIL-098	--	--	Active/Exempt Grid Area
NIL-099	--	--	Active/Exempt Grid Area
NIL-100	9/26/2024	62.46	Initial Monitoring
NIL-100	10/3/2024	54.60	First 10-Day Recheck
NIL-100	10/11/2024	--	Active Grid
NIL-101	--	--	Active/Exempt Grid Area
NIL-102	--	--	Active/Exempt Grid Area
NIL-103	--	--	Active/Exempt Grid Area
NIL-104	9/25/2024	15.03	
NIL-105	--	--	Active/Exempt Grid Area
NIL-106	--	--	Active/Exempt Grid Area
NIL-107	--	--	Active/Exempt Grid Area
NIL-108	9/25/2024	89.85	Initial Monitoring
NIL-108	10/3/2024	63.82	First 10-Day Recheck
NIL-108	10/11/2024	--	Active Grid
NIL-109	9/25/2024	10.65	
NIL-110	--	--	Active/Exempt Grid Area
NIL-111	--	--	Active/Exempt Grid Area

Third Quarter 2024
Table 2. Integrated Surface Emissions Monitoring Results
Newby Island Landfill, Milpitas, California

Point Name	Record Date	FID Concentration (ppm)	Comments
NIL-112	--	--	Active/Exempt Grid Area
NIL-113	9/23/2024	7.74	
NIL-114	9/23/2024	7.43	
NIL-115	9/25/2024	12.53	
NIL-116	--	--	Active/Exempt Grid Area
NIL-117	--	--	Active/Exempt Grid Area
NIL-118	--	--	Active/Exempt Grid Area
NIL-119	9/25/2024	35.92	Initial Monitoring
NIL-119	10/3/2024	59.74	First 10-Day Recheck
NIL-119	10/11/2024	24.85	Second 10-Day Recheck
NIL-120	9/25/2024	42.25	Initial Monitoring
NIL-120	10/3/2024	86.28	First 10-Day Recheck
NIL-120	10/11/2024	54.02	Second 10-Day Recheck Expansion due by January 22, 2025
NIL-121	--	--	Active/Exempt Grid Area
NIL-122	--	--	Active/Exempt Grid Area
NIL-123	--	--	Active/Exempt Grid Area
NIL-124	9/23/2024	5.20	
NIL-125	9/23/2024	6.33	
NIL-126	9/25/2024	9.27	
NIL-127	--	--	Active/Exempt Grid Area
NIL-128	--	--	Active/Exempt Grid Area
NIL-129	--	--	Active/Exempt Grid Area
NIL-130	9/25/2024	25.62	Initial Monitoring
NIL-130	10/3/2024	56.41	First 10-Day Recheck
NIL-130	10/11/2024	22.44	Second 10-Day Recheck
NIL-131	9/25/2024	24.10	
NIL-132	--	--	Active/Exempt Grid Area
NIL-133	--	--	Active/Exempt Grid Area
NIL-134	--	--	Active/Exempt Grid Area
NIL-135	9/23/2024	8.15	
NIL-136	9/23/2024	9.51	
NIL-137	--	--	Active/Exempt Grid Area
NIL-138	--	--	Active/Exempt Grid Area
NIL-139	--	--	Active/Exempt Grid Area
NIL-140	9/25/2024	7.28	
NIL-141	9/25/2024	27.88	Initial Monitoring
NIL-141	10/3/2024	42.47	First 10-Day Recheck
NIL-141	10/11/2024	39.87	Second 10-Day Recheck Expansion due by January 22, 2025
NIL-142	--	--	Active/Exempt Grid Area
NIL-143	--	--	Active/Exempt Grid Area
NIL-144	--	--	Active/Exempt Grid Area
NIL-145	9/23/2024	12.02	

Third Quarter 2024
Table 2. Integrated Surface Emissions Monitoring Results
Newby Island Landfill, Milpitas, California

Point Name	Record Date	FID Concentration (ppm)	Comments
NIL-146	9/23/2024	10.16	
NIL-147	9/25/2024	9.05	
NIL-148	--	--	Active/Exempt Grid Area
NIL-149	--	--	Active/Exempt Grid Area
NIL-150	--	--	Active/Exempt Grid Area
NIL-151	9/25/2024	21.74	
NIL-152	9/25/2024	20.32	
NIL-153	--	--	Active/Exempt Grid Area
NIL-154	--	--	Active/Exempt Grid Area
NIL-155	--	--	Active/Exempt Grid Area
NIL-156	9/23/2024	8.52	
NIL-157	9/23/2024	7.80	
NIL-158	--	--	Active/Exempt Grid Area
NIL-159	--	--	Active/Exempt Grid Area
NIL-160	--	--	Active/Exempt Grid Area
NIL-161	9/25/2024	19.09	
NIL-162	9/25/2024	22.20	
NIL-163	9/26/2024	24.45	
NIL-164	--	--	Active/Exempt Grid Area
NIL-165	--	--	Active/Exempt Grid Area
NIL-166	9/23/2024	6.41	
NIL-167	9/23/2024	7.00	
NIL-168	--	--	Active/Exempt Grid Area
NIL-169	--	--	Active/Exempt Grid Area
NIL-170	--	--	Active/Exempt Grid Area
NIL-171	--	--	Active/Exempt Grid Area
NIL-172	9/25/2024	36.40	Initial Monitoring
NIL-172	10/3/2024	29.90	First 10-Day Recheck
NIL-172	10/11/2024	58.21	Second 10-Day Recheck Expansion due by January 22, 2025
NIL-173	9/26/2024	51.57	Initial Monitoring
NIL-173	10/3/2024	16.59	First 10-Day Recheck
NIL-174	9/26/2024	24.88	
NIL-175	--	--	Active/Exempt Grid Area
NIL-176	--	--	Active/Exempt Grid Area
NIL-177	9/23/2024	6.87	
NIL-178	9/23/2024	6.45	
NIL-179	--	--	Active/Exempt Grid Area
NIL-180	--	--	Active/Exempt Grid Area
NIL-181	--	--	Active/Exempt Grid Area
NIL-182	9/25/2024	37.07	Initial Monitoring
NIL-182	10/3/2024	50.42	First 10-Day Recheck
NIL-182	10/11/2024	17.15	Second 10-Day Recheck

Third Quarter 2024
Table 2. Integrated Surface Emissions Monitoring Results
Newby Island Landfill, Milpitas, California

Point Name	Record Date	FID Concentration (ppm)	Comments
NIL-183	9/26/2024	63.49	Initial Monitoring
NIL-183	10/3/2024	41.49	First 10-Day Recheck
NIL-183	10/11/2024	22.24	Second 10-Day Recheck
NIL-184	9/26/2024	23.72	
NIL-185	9/25/2024	17.61	
NIL-186	--	--	Active/Exempt Grid Area
NIL-187	9/23/2024	7.73	
NIL-188	9/23/2024	7.70	
NIL-189	--	--	Active/Exempt Grid Area
NIL-190	--	--	Active/Exempt Grid Area
NIL-191	--	--	Active/Exempt Grid Area
NIL-192	9/25/2024	19.48	
NIL-193	9/26/2024	89.48	Initial Monitoring
NIL-193	10/3/2024	21.07	First 10-Day Recheck
NIL-194	9/26/2024	30.74	Initial Monitoring
NIL-194	10/3/2024	26.36	First 10-Day Recheck
NIL-194	10/11/2024	23.01	Second 10-Day Recheck
NIL-195	9/25/2024	18.51	
NIL-196	--	--	Active/Exempt Grid Area
NIL-197	9/23/2024	9.09	
NIL-198	9/23/2024	8.51	
NIL-199	9/25/2024	4.38	
NIL-200	9/25/2024	6.21	
NIL-201	9/25/2024	8.58	
NIL-202	--	--	Active/Exempt Grid Area
NIL-203	9/25/2024	20.40	
NIL-204	9/26/2024	47.72	Initial Monitoring
NIL-204	10/3/2024	21.18	First 10-Day Recheck
NIL-205	9/26/2024	25.70	Initial Monitoring
NIL-205	10/3/2024	23.86	First 10-Day Recheck
NIL-206	--	--	Active/Exempt Grid Area
NIL-207	9/23/2024	36.73	Initial Monitoring
NIL-207	10/3/2024	33.80	First 10-Day Recheck
NIL-207	10/11/2024	18.32	Second 10-Day Recheck
NIL-208	9/23/2024	10.65	
NIL-209	9/23/2024	10.90	
NIL-210	9/25/2024	14.21	
NIL-211	--	--	Active/Exempt Grid Area
NIL-212	9/25/2024	19.49	
NIL-213	9/26/2024	37.64	Initial Monitoring
NIL-213	10/3/2024	29.38	First 10-Day Recheck
NIL-213	10/11/2024	18.43	Second 10-Day Recheck
NIL-214	9/26/2024	17.38	

Third Quarter 2024
Table 2. Integrated Surface Emissions Monitoring Results
Newby Island Landfill, Milpitas, California

Point Name	Record Date	FID Concentration (ppm)	Comments
NIL-215	--	--	Active/Exempt Grid Area
NIL-216	9/23/2024	13.35	
NIL-217	9/23/2024	18.20	
NIL-218	9/23/2024	13.72	
NIL-219	9/25/2024	8.34	
NIL-220	--	--	Active/Exempt Grid Area
NIL-221	9/25/2024	18.81	
NIL-222	9/26/2024	17.10	
NIL-223	9/26/2024	11.73	
NIL-224	9/25/2024	12.69	
NIL-225	9/23/2024	13.77	
NIL-226	9/23/2024	17.77	
NIL-227	9/23/2024	9.69	
NIL-228	9/25/2024	9.44	
NIL-229	--	--	Active/Exempt Grid Area
NIL-230	9/25/2024	14.77	
NIL-231	9/26/2024	20.23	
NIL-232	9/26/2024	22.46	
NIL-233	9/25/2024	9.73	
NIL-234	--	--	Active/Exempt Grid Area
NIL-235	9/23/2024	11.85	
NIL-236	9/23/2024	10.91	
NIL-237	9/23/2024	9.95	
NIL-238	9/25/2024	8.69	
NIL-239	--	--	Active/Exempt Grid Area
NIL-240	9/25/2024	17.36	
NIL-241	9/26/2024	25.86	Initial Monitoring
NIL-241	10/3/2024	10.15	First 10-Day Recheck
NIL-242	9/23/2024	6.75	
NIL-243	9/23/2024	6.29	
NIL-244	9/23/2024	11.31	
NIL-245	--	--	Active/Exempt Grid Area
NIL-246	9/25/2024	13.00	
NIL-247	9/26/2024	22.26	
NIL-248	--	--	Active/Exempt Grid Area
NIL-249	--	--	Active/Exempt Grid Area
NIL-250	9/25/2024	5.59	
NIL-251	9/25/2024	7.82	
NIL-252	9/25/2024	5.54	
NIL-253	9/25/2024	7.98	
NIL-254	9/26/2024	5.20	
NIL-255	--	--	Active/Exempt Grid Area
NIL-256	9/23/2024	7.80	

Third Quarter 2024
Table 2. Integrated Surface Emissions Monitoring Results
Newby Island Landfill, Milpitas, California

Point Name	Record Date	FID Concentration (ppm)	Comments
NIL-257	9/23/2024	12.95	
NIL-258	--	--	Active/Exempt Grid Area
NIL-259	9/23/2024	7.78	
NIL-260	--	--	Active/Exempt Grid Area
NIL-261	9/23/2024	11.34	
NIL-262	9/23/2024	14.20	
NIL-263	--	--	Active/Exempt Grid Area
NIL-264	9/23/2024	11.45	
NIL-265	--	--	Active/Exempt Grid Area
NIL-266	--	--	Active/Exempt Grid Area
NIL-267	--	--	Active/Exempt Grid Area
NIL-268	--	--	Active/Exempt Grid Area
NIL-269	--	--	Active/Exempt Grid Area
NIL-270	--	--	Active/Exempt Grid Area
NIL-271	--	--	Active/Exempt Grid Area
NIL-272	--	--	Active/Exempt Grid Area
NIL-273	--	--	Active/Exempt Grid Area
NIL-274	--	--	Active/Exempt Grid Area
NIL-275	--	--	Active/Exempt Grid Area
NIL-276	--	--	Active/Exempt Grid Area
NIL-277	--	--	Active/Exempt Grid Area

Attachment 5

Calibration Logs

SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA

Date: 9.23.24 Site Name: Newby

Inspector(s): A. Delgado, Mo Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 2 MPH Wind Direction: NE Barometric Pressure: 29.88 "Hg

Air Temperature: 56 °F General Weather Conditions: Mostly Sunny

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

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

Instrument Serial Number: 1220 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	|Cal Gas Conc.-Cal Gas Reading|	Response Time (seconds)
1	-0.1	502	2	6
2	-0.1	501	1	7
3	0	500	0	6

Average Difference: 3

*Perform recalibration if average difference is greater than 10

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

= 100%- 3 /500 x 100%

= 1 %

Span Sensitivity:

Trial 1:
Counts Observed for the Span= 147672
Counters Observed for the Zero= 3758

Trial 2:
Counts Observed for the Span= 149740
Counters Observed for the Zero= 3704

Trial 3:
Counts Observed for the Span= 148748
Counters Observed for the Zero= 3725

Post Monitoring Calibration Check

Zero Air Reading: 2.1 ppm Cal Gas Reading: 501 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Y Reading: 2.7 ppm

Downwind Location Description: grid Reading: 3.2 ppm

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

SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA

Date: 9-23-24 Site Name: NewB4

Inspector(s): Don Gibson Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 1 MPH Wind Direction: W Barometric Pressure: 29.88 "Hg

Air Temperature: 56 °F General Weather Conditions: Sunny

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

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

Instrument Serial Number: 4106 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	|Cal Gas Conc.-Cal Gas Reading|	Response Time (seconds)
1	-0.1	500	0	7
2	-0.1	498	2	5
3	-0.1	500	0	7

Average Difference: 2

*Perform recalibration if average difference is greater than 10

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

= 100%- .C /500 x 100%

= 99.88 %

Span Sensitivity:

Trial 1:
Counts Observed for the Span= 141288
Counters Observed for the Zero= 5305

Trial 2:
Counts Observed for the Span= 1412362
Counters Observed for the Zero= 5298

Trial 3:
Counts Observed for the Span= 142743
Counters Observed for the Zero= 5277

Post Monitoring Calibration Check

Zero Air Reading: -2.0 ppm Cal Gas Reading: 494 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: F Reading: 2.7 ppm

Downwind Location Description: grid Reading: 3.2 ppm

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

SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA

Date: 9-23-24 Site Name: Newby

Inspector(s): Andrew Stone Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 1 MPH Wind Direction: W Barometric Pressure: 29.88 "Hg

Air Temperature: 56 °F General Weather Conditions: 29.88

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

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

Instrument Serial Number: 1211 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	|Cal Gas Conc.-Cal Gas Reading|	Response Time (seconds)
1	-0.1	500	0	7
2	-0.1	500	0	7
3	0	500	0	7

Average Difference: 0

*Perform recalibration if average difference is greater than 10

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

= 100%- 0 /500 x 100%

= 100 %

Span Sensitivity:

Trial 1:
Counts Observed for the Span= 148016
Counters Observed for the Zero= ~~3837~~ 3744

Trial 2:
Counts Observed for the Span= 148434
Counters Observed for the Zero= 3714

Trial 3:
Counts Observed for the Span= 149118
Counters Observed for the Zero= 3692

Post Monitoring Calibration Check

Zero Air Reading: -1.6 ppm Cal Gas Reading: 496 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: F Reading: 2.7 ppm

Downwind Location Description: grid Reading: 3.2 ppm

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

SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA

Date: 9.24.24 Site Name: Newby

Inspector(s): ADrian Delgadillo Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 3 MPH Wind Direction: NNE Barometric Pressure: 29.77 "Hg

Air Temperature: 62 °F General Weather Conditions: Mostly Sunny

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

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

Instrument Serial Number: 1211 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	|Cal Gas Conc.-Cal Gas Reading|	Response Time (seconds)
1	-0.1	502	2	3
2	0	501	1	5
3	0	501	1	4

Average Difference: 4

*Perform recalibration if average difference is greater than 10

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

= 100%- 1.3 /500 x 100%

= 99.74%

Span Sensitivity:

Trial 1:
Counts Observed for the Span= 148776
Counters Observed for the Zero= 4032

Trial 2:
Counts Observed for the Span= 147772
Counters Observed for the Zero= 3972

Trial 3:
Counts Observed for the Span= 146100
Counters Observed for the Zero= 3875

Post Monitoring Calibration Check

Zero Air Reading: -0.1 ppm Cal Gas Reading: 502 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Plant Reading: 2.9 ppm

Downwind Location Description: [redacted]749 Reading: 3.2 ppm

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

SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA

Date: 9.24.24 Site Name: Newby

Inspector(s): Andrew Stone Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 3 MPH Wind Direction: NNE Barometric Pressure: 29.77 "Hg

Air Temperature: 62 °F General Weather Conditions: Mostly Sunny

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

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

Instrument Serial Number: 1220 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	|Cal Gas Conc.-Cal Gas Reading|	Response Time (seconds)
1	-0.1	502	2	1
2	-0.1	501	1	2
3	-0.1	500	0	3

Average Difference: 3

*Perform recalibration if average difference is greater than 10

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

= 100%- 1 /500 x 100%

= 99.8 %

Span Sensitivity:

Trial 1:
Counts Observed for the Span= 142312
Counters Observed for the Zero= 3958

Trial 2:
Counts Observed for the Span= 143938
Counters Observed for the Zero= 3884

Trial 3:
Counts Observed for the Span= 143852
Counters Observed for the Zero= 3844

Post Monitoring Calibration Check

Zero Air Reading: 1.2 ppm Cal Gas Reading: 502 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: NE Reading: 2.7 ppm

Downwind Location Description: grid 249 Reading: 3.2 ppm

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

SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA

Date: 9/24/24 Site Name: NEWBY

Inspector(s): E. PAZ Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 3 MPH Wind Direction: NE Barometric Pressure: 30.01 "Hg

Air Temperature: 62 °F General Weather Conditions: CLOUDY

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

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

Instrument Serial Number: 2367 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	|Cal Gas Conc.-Cal Gas Reading|	Response Time (seconds)
1	0	~~5001~~ 501	1	7
2	-0.1	~~5002~~ 502	2	6
3	0	500	0	6

Average Difference: 3

*Perform recalibration if average difference is greater than 10

Calibration Precision= Average Difference/Cal Gas Conc X 100%

= 100% - 1 /500 x 100%

= 99.8 %

Span Sensitivity:

Trial 1:
Counts Observed for the Span= 141315
Counters Observed for the Zero= 5042

Trial 2:
Counts Observed for the Span= 141330
Counters Observed for the Zero= 5057

Trial 3:
Counts Observed for the Span= 141574
Counters Observed for the Zero= 5072

Post Monitoring Calibration Check

Zero Air Reading: -0.4 ppm Cal Gas Reading: 496 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Plare Reading: 2.7 ppm

Downwind Location Description: G 249 Reading: 3.2 ppm

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

SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA

Date: 9-24-24 Site Name: NEWBY

Inspector(s): Don Gibson Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 3 MPH Wind Direction: NNE Barometric Pressure: 29.77 "Hg

Air Temperature: 62 °F General Weather Conditions: Sunny

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

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

Instrument Serial Number: 2364 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	|Cal Gas Conc.-Cal Gas Reading|	Response Time (seconds)
1	0	501	1	6
2	-0.1	502	2	7
3		503	3	6

Average Difference: 6

*Perform recalibration if average difference is greater than 10

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

= 100%- .2 /500 x 100%

= 99.6 %

Span Sensitivity:

Trial 1:
Counts Observed for the Span= 148236
Counters Observed for the Zero= ~~48457~~ 4047

Trial 2:
Counts Observed for the Span= 148044
Counters Observed for the Zero= 4292

Trial 3:
Counts Observed for the Span= 147754
Counters Observed for the Zero= 4197

Post Monitoring Calibration Check

Zero Air Reading: -0.1 ppm Cal Gas Reading: 503 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Flare Reading: 2.7 ppm

Downwind Location Description: G 249 Reading: 3.2 ppm

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

[illegible]

SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA

Date: 9-24-2024 Site Name: Newby

Inspector(s): Collil Brown Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 3 MPH Wind Direction: NNE Barometric Pressure: 29.77 "Hg

Air Temperature: 62 °F General Weather Conditions: Sunny

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

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

Instrument Serial Number: 1223 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	|Cal Gas Conc.-Cal Gas Reading|	Response Time (seconds)
1	0	501	1	8
2	0	494	1	7
3	-0.1	500	0	7

Average Difference: 2

*Perform recalibration if average difference is greater than 10

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

= 100%- .8 /500 x 100%

= 9988 %

Span Sensitivity:

Trial 1:
Counts Observed for the Span= 1294464
Counters Observed for the Zero= 4644

Trial 2:
Counts Observed for the Span= 129172
Counters Observed for the Zero= 4571

Trial 3:
Counts Observed for the Span= 128668
Counters Observed for the Zero= 4563

Post Monitoring Calibration Check

Zero Air Reading: 1.2 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: flare Reading: 2.7 ppm

Downwind Location Description: grid 219 Reading: 3.2 ppm

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

SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA

Date: 09/24/24 Site Name: Newby

Inspector(s): A. Gomez Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 3 MPH Wind Direction: NNE Barometric Pressure: 29.77 "Hg

Air Temperature: 62 °F General Weather Conditions: Sunny

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

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

Instrument Serial Number: 2364 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	|Cal Gas Conc.-Cal Gas Reading|	Response Time (seconds)
1	-0.1	500	0	9
2	-0.1	496	4	7
3	0	503	3	8

Average Difference: 7

*Perform recalibration if average difference is greater than 10

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

= 100%- 2.3 /500 x 100%

= 99.54 %

Span Sensitivity:

Trial 1:
Counts Observed for the Span= 191808
Counters Observed for the Zero= 4947

Trial 2:
Counts Observed for the Span= 192464
Counters Observed for the Zero= 4887

Trial 3:
Counts Observed for the Span= 190552
Counters Observed for the Zero= 4839

Post Monitoring Calibration Check

Zero Air Reading: 1.7 ppm Cal Gas Reading: 499 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Plant Reading: 2.7 ppm

Downwind Location Description: grid Reading: 3.2 ppm

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

SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA

Date: 09/24/24 Site Name: Newby

Inspector(s): Alfredo Mendoza Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 3 MPH Wind Direction: NNE Barometric Pressure: 29.77 "Hg

Air Temperature: 62 °F General Weather Conditions: Sunny

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

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

Instrument Serial Number: 5420 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	|Cal Gas Conc.-Cal Gas Reading|	Response Time (seconds)
1	-0.1	505	5	7
2	0.0	500	0	7
3	-0.1	499	1	7

Average Difference: 6

*Perform recalibration if average difference is greater than 10

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

= 100%- 2 /500 x 100%

= 99.6 %

Span Sensitivity:

Trial 1:
Counts Observed for the Span= 128416
Counters Observed for the Zero= 3598

Trial 2:
Counts Observed for the Span= 130176
Counters Observed for the Zero= 3580

Trial 3:
Counts Observed for the Span= 130392
Counters Observed for the Zero= 3549

Post Monitoring Calibration Check

Zero Air Reading: 1.3 ppm Cal Gas Reading: 502 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: line Reading: 2.7 ppm

Downwind Location Description: grid 219 Reading: 3.2 ppm

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

SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA

Date: 09-24-24 Site Name: Newby

Inspector(s): Ricardo Vepez Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 3 MPH Wind Direction: NNE Barometric Pressure: 29.77 "Hg

Air Temperature: 62 °F General Weather Conditions: Sunny

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

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

Instrument Serial Number: 5419 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	|Cal Gas Conc.-Cal Gas Reading|	Response Time (seconds)
1	-0.1	500	0	7
2	0	502	2	8
3	-0.1	500	0	8

Average Difference: 2

*Perform recalibration if average difference is greater than 10

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

= 100%- .6 /500 x 100%

= 99.88%

Span Sensitivity:

Trial 1:
Counts Observed for the Span= 162620
Counters Observed for the Zero= 5038

Trial 2:
Counts Observed for the Span= 160668
Counters Observed for the Zero= 4986

Trial 3:
Counts Observed for the Span= 162072
Counters Observed for the Zero= 4952

Post Monitoring Calibration Check

Zero Air Reading: 1.3 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Flare Reading: 2.7 ppm

Downwind Location Description: grid 219 Reading: 3.2 ppm

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

SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA

Date: 09/25/24 Site Name: Newby

Inspector(s): Alondo Mendoza Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 2 MPH Wind Direction: SW Barometric Pressure: 29.83 "Hg

Air Temperature: 58 °F General Weather Conditions: Cloudy

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

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

Instrument Serial Number: 5420 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	|Cal Gas Conc.-Cal Gas Reading|	Response Time (seconds)
1	0	505	5	7
2	0	501	1	7
3	0.1	499	1	7

Average Difference: 1

*Perform recalibration if average difference is greater than 10

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

= 100%- 2.3 /500 x 100%

= 99.54%

Span Sensitivity:

Trial 1:
Counts Observed for the Span= 115676
Counters Observed for the Zero= 3510

Trial 2:
Counts Observed for the Span= 116252
Counters Observed for the Zero= 3498

Trial 3:
Counts Observed for the Span= 117428
Counters Observed for the Zero= 3515

Post Monitoring Calibration Check

Zero Air Reading: 1.3 ppm Cal Gas Reading: 503 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Slave Reading: 3.7 ppm

Downwind Location Description: grid Reading: 8.9 ppm

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

SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA

Date: 9-25-24 Site Name: Newby

Inspector(s): R. Yepez Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 2 MPH Wind Direction: SW Barometric Pressure: 29.83 "Hg

Air Temperature: 58 °F General Weather Conditions: cloudy

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

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

Instrument Serial Number: 5419 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	|Cal Gas Conc.-Cal Gas Reading|	Response Time (seconds)
1	-0.1	498	2	6
2	0	501	1	6
3	0	500	0	5

Average Difference: 3

*Perform recalibration if average difference is greater than 10

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

= 100%- 3 /500 x 100%

= 1 %

Span Sensitivity:

Trial 1:
Counts Observed for the Span= 178067
Counters Observed for the Zero= 5085

Trial 2:
Counts Observed for the Span= 174164
Counters Observed for the Zero= 5077

Trial 3:
Counts Observed for the Span= 176254
Counters Observed for the Zero= 5073

Post Monitoring Calibration Check

Zero Air Reading: -0.5 ppm Cal Gas Reading: 492 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: flare Reading: 3.7 ppm

Downwind Location Description: grid Reading: 8.9 ppm

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

SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA

Date: 9-25-24 Site Name: Newby

Inspector(s): Alfredo Gomez Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 2 MPH Wind Direction: SW Barometric Pressure: 29.83 "Hg

Air Temperature: 58 °F General Weather Conditions: Cloudy

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

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

Instrument Serial Number: 2364 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	|Cal Gas Conc.-Cal Gas Reading|	Response Time (seconds)
1	-0.1	501	1	7
2	-0.2	500	0	7
3	0	499	1	7

Average Difference: 2

*Perform recalibration if average difference is greater than 10

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

= 100%- .6 /500 x 100%

= 99.88 %

Span Sensitivity:

Trial 1:

Counts Observed for the Span= 144596

Counters Observed for the Zero= 4190 ~~4190~~

Trial 2:

Counts Observed for the Span= 143220

Counters Observed for the Zero= 4133

Trial 3:

Counts Observed for the Span= 145355

Counters Observed for the Zero= 4154

Post Monitoring Calibration Check

Zero Air Reading: 1.1 ppm Cal Gas Reading: 499 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Flare Reading: 3.7 ppm

Downwind Location Description: grid Reading: 8.9 ppm

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

SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA

Date: 9.25.24 Site Name: Newby

Inspector(s): A. Deboard, Ila Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 2 MPH Wind Direction: SW Barometric Pressure: 29.82 "Hg

Air Temperature: 58 °F General Weather Conditions: Partly Cloudy

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

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

Instrument Serial Number: 1211 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	|Cal Gas Conc.-Cal Gas Reading|	Response Time (seconds)
1	0	498	2	5
2	0	500	0	6
3	-0.1	500	0	4

Average Difference: 2

*Perform recalibration if average difference is greater than 10

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

= 100%- .6 /500 x 100%

= 99.88 %

Span Sensitivity:

Trial 1:
Counts Observed for the Span= 153156
Counters Observed for the Zero= 4019

Trial 2:
Counts Observed for the Span= 150568
Counters Observed for the Zero= 3936

Trial 3:
Counts Observed for the Span= 1499961
Counters Observed for the Zero= 4061

Post Monitoring Calibration Check

Zero Air Reading: 1.8 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Slave Reading: 3.7 ppm

Downwind Location Description: grid Reading: 8.9 ppm

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

SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA

Date: 9.25.24 Site Name: Necsby

Inspector(s): C. Broom Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 2 MPH Wind Direction: SW Barometric Pressure: 29.82 "Hg

Air Temperature: 58 °F General Weather Conditions: Partly Cloudy

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

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

Instrument Serial Number: 1223 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	|Cal Gas Conc.-Cal Gas Reading|	Response Time (seconds)
1	-0.1	500	0	7
2	-0.1	502	2	6
3	-0.1	501	1	7

Average Difference: 3

*Perform recalibration if average difference is greater than 10

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

= 100%- 1 /500 x 100%

= 99.8 %

Span Sensitivity:

Trial 1:
Counts Observed for the Span= 117800
Counters Observed for the Zero= 4900

Trial 2:
Counts Observed for the Span= 124117
Counters Observed for the Zero= 4887

Trial 3:
Counts Observed for the Span= 123512
Counters Observed for the Zero= 4870

Post Monitoring Calibration Check

Zero Air Reading: 1.9 ppm Cal Gas Reading: 501 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: flare Reading: 3.7 ppm

Downwind Location Description: grid Reading: 8.9 ppm

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

SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA

Date: 09/25/24 Site Name: Newby

Inspector(s): [redacted] Don Gibson Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 2 MPH Wind Direction: SW Barometric Pressure: 29.83 "Hg

Air Temperature: 58 °F General Weather Conditions: Cloudy

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

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

Instrument Serial Number: 4006 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	|Cal Gas Conc.-Cal Gas Reading|	Response Time (seconds)
1	0	501	1	7
2	0	499	1	7
3	-0.1	498	2	7

Average Difference: 4

*Perform recalibration if average difference is greater than 10

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

= 100%- 1.3 /500 x 100%

= 99.74%

Span Sensitivity:

Trial 1:
Counts Observed for the Span= 144080
Counters Observed for the Zero= 5300

Trial 2:
Counts Observed for the Span= 145116
Counters Observed for the Zero= 5280

Trial 3:
Counts Observed for the Span= 145148
Counters Observed for the Zero= 5249

Post Monitoring Calibration Check

Zero Air Reading: 1.1 ppm Cal Gas Reading: 502 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Fence Reading: 3.7 ppm

Downwind Location Description: Grid Reading: 8.9 ppm

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

SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA

Date: 9-24-24 Site Name: NEWBY

Inspector(s): Dan Gibson Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 3 MPH Wind Direction: NNE Barometric Pressure: 29.77 "Hg

Air Temperature: 62 °F General Weather Conditions: Sunny

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

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

Instrument Serial Number: 2364 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	|Cal Gas Conc.-Cal Gas Reading|	Response Time (seconds)
1	0	501		
2	-0.1	502		
3		503		

Average Difference: [ ]

*Perform recalibration if average difference is greater than 10

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

= 100%- _____ /500 x 100%

= %

Span Sensitivity:

Trial 1:
Counts Observed for the Span= 148236
Counters Observed for the Zero= ~~4847~~ 4047

Trial 2:
Counts Observed for the Span= 148044
Counters Observed for the Zero= 4292

Trial 3:
Counts Observed for the Span= 147754
Counters Observed for the Zero= 4197

Post Monitoring Calibration Check

Zero Air Reading: -0.1 ppm Cal Gas Reading: 503 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: flare Reading: 2.7 ppm

Downwind Location Description: G 349 Reading: 3.2 ppm

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

SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA

Date: 9.24.24 Site Name: Newby

Inspector(s): ADrian Delgadillo Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 3 MPH Wind Direction: NNE Barometric Pressure: 29.77 "Hg

Air Temperature: 62 °F General Weather Conditions: Mostly sunny

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

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

Instrument Serial Number: 1211 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	|Cal Gas Conc.-Cal Gas Reading|	Response Time (seconds)
1	-0.1	502	2	3
2	0	501	1	5
3	0	501	1	4

Average Difference: 4

*=Perform recalibration if average difference is greater than 10

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

= 100%- 1.3 /500 x 100%

= 99.74%

Span Sensitivity:

Trial 1: Counts Observed for the Span= 148776 Counters Observed for the Zero= 4032

Trial 2: Counts Observed for the Span= 147772 Counters Observed for the Zero= 3972

Trial 3: Counts Observed for the Span= 146100 Counters Observed for the Zero= 3875

Post Monitoring Calibration Check

Zero Air Reading: _____ ppm Cal Gas Reading: _____ ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: _____ Reading: _____ ppm

Downwind Location Description: _____ Reading: _____ ppm

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

SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA

Date: 9.24.24

Site Name: Newby

Inspector(s): Andrew Stone

Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 3 MPH

Wind Direction: NNE

Barometric Pressure: 29.77 "Hg

Air Temperature: 62 °F

General Weather Conditions: Mostly Sunny

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

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

Instrument Serial Number: 1220

Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	|Cal Gas Conc.-Cal Gas Reading|	Response Time (seconds)
1	-0.1	502	2	2
2	-0.1	501	1	3
3	-0.1	500	0	3

Average Difference: 3

*Perform recalibration if average difference is greater than 10

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

= 100%- 1 /500 x 100%

= 99.8 %

Span Sensitivity:

Trial 1:
Counts Observed for the Span= 142312
Counters Observed for the Zero= 3958

Trial 2:
Counts Observed for the Span= 143938
Counters Observed for the Zero= 3884

Trial 3:
Counts Observed for the Span= 143852
Counters Observed for the Zero= 3844

Post Monitoring Calibration Check

Zero Air Reading: 1.2 ppm

Cal Gas Reading: 502 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: NE

Reading: 2.7 ppm

Downwind Location Description: grid 349

Reading: 3.2 ppm

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

SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA

Date: 9-26-24 Site Name: Newby

Inspector(s): [illegible] Ricardo Lopez Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 1 MPH Wind Direction: S Barometric Pressure: 29.89 "Hg

Air Temperature: 55 °F General Weather Conditions: sunny

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

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

Instrument Serial Number: [illegible] 5419 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	|Cal Gas Conc.-Cal Gas Reading|	Response Time (seconds)
1	0	502	2	3
2	-0.1	501	1	1
3	0	500	0	4

Average Difference: 1

*Perform recalibration if average difference is greater than 10

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

= 100%- 1 /500 x 100%

= 99.88 %

Span Sensitivity:

Trial 1:
Counts Observed for the Span= 172416
Counters Observed for the Zero= 5317

Trial 2:
Counts Observed for the Span= 170191
Counters Observed for the Zero= 5362

Trial 3:
Counts Observed for the Span= 171250
Counters Observed for the Zero= 5374

Post Monitoring Calibration Check

Zero Air Reading: 1.7 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Flare Reading: 2.7 ppm

Downwind Location Description: G349 Reading: 3.2 ppm

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

SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA

Date: 09/26/24 Site Name: Newby

Inspector(s): Alfredo Mendoza Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 2 MPH Wind Direction: W Barometric Pressure: 29.87 "Hg

Air Temperature: 54 °F General Weather Conditions: Sunny

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

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

Instrument Serial Number: 5420 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	|Cal Gas Conc.-Cal Gas Reading|	Response Time (seconds)
1	0.1	498	2	7
2	0	498	2	7
3	-0.1	500	0	7

Average Difference: 4

*Perform recalibration if average difference is greater than 10

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

= 100%- 1.3 /500 x 100%

= 99.7 %

Span Sensitivity:

Trial 1:
Counts Observed for the Span= 113540
Counters Observed for the Zero= 3648

Trial 2:
Counts Observed for the Span= 116994
Counters Observed for the Zero= 3612

Trial 3:
Counts Observed for the Span= 115496
Counters Observed for the Zero= 3619

Post Monitoring Calibration Check

Zero Air Reading: -0.1 ppm Cal Gas Reading: 503 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: flare Reading: 2.7 ppm

Downwind Location Description: grid. 349 Reading: 3.2 ppm

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

SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA

Date: 09/26/24 Site Name: Newby

Inspector(s): Alfredo Gomez Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 2 MPH Wind Direction: W Barometric Pressure: 29.87 "Hg

Air Temperature: 54 °F General Weather Conditions: Sunny

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

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

Instrument Serial Number: 4106 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	|Cal Gas Conc.-Cal Gas Reading|	Response Time (seconds)
1	0	499	1	6
2	0	502	2	5
3	0	500	0	6

Average Difference: 1

*Perform recalibration if average difference is greater than 10

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

= 100%- 1 /500 x 100%

99.8 %

Span Sensitivity:

Trial 1:
Counts Observed for the Span= 149829
Counters Observed for the Zero= 5456

Trial 2:
Counts Observed for the Span= 150252
Counters Observed for the Zero= 5420

Trial 3:
Counts Observed for the Span= 150129
Counters Observed for the Zero= 5437

Post Monitoring Calibration Check

Zero Air Reading: 0.1 ppm Cal Gas Reading: 502 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Plant Reading: 2.7 ppm

Downwind Location Description: G 549 Reading: 3.2 ppm

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

SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA

Date: 9-26-24 Site Name: Medley

Inspector(s): Don Gibson Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 1 MPH Wind Direction: S Barometric Pressure: 29 "Hg

Air Temperature: 55 °F General Weather Conditions: sunny

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

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

Instrument Serial Number: 2364 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	|Cal Gas Conc.-Cal Gas Reading|	Response Time (seconds)
1	-0.1	501	1	6
2	-0.1	500	0	5
3	0	501	1	6

Average Difference: 2

*Perform recalibration if average difference is greater than 10

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

= 100%- 1 /500 x 100%

= 99.8 %

Span Sensitivity:

Trial 1:
Counts Observed for the Span= 147838
Counters Observed for the Zero= 4285

Trial 2:
Counts Observed for the Span= 148212
Counters Observed for the Zero= 4252

Trial 3:
Counts Observed for the Span= 148243
Counters Observed for the Zero= 4254

Post Monitoring Calibration Check

Zero Air Reading: -0.1 ppm Cal Gas Reading: 502 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Flare Reading: 2.7 ppm

Downwind Location Description: G349 Reading: 3.2 ppm

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

SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA

Date: 10-03-24 Site Name: Newby

Inspector(s): Emmanuel Paz Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 2 MPH Wind Direction: W.N Barometric Pressure: 29.80 "Hg

Air Temperature: 67 °F General Weather Conditions: Sunny

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

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

Instrument Serial Number: 5420 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	|Cal Gas Conc.-Cal Gas Reading|	Response Time (seconds)
1	0	503	3	7
2	-0.1	499	1	6
3	-0.1	501	1	9

Average Difference: 5

*Perform recalibration if average difference is greater than 10

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

= 100%- 1.6 /500 x 100%

= 99.68 %

Span Sensitivity:

Trial 1:
Counts Observed for the Span= 144320
Counters Observed for the Zero= 2712

Trial 2:
Counts Observed for the Span= 139754
Counters Observed for the Zero= 3433

Trial 3:
Counts Observed for the Span= 142753
Counters Observed for the Zero= 2972

Post Monitoring Calibration Check

Zero Air Reading: 1.2 ppm Cal Gas Reading: 498 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Plant Reading: 2.4 ppm

Downwind Location Description: grid Reading: 1.3 ppm

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

SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA

Date: 10-03-24 Site Name: Newby

Inspector(s): R. Yepez Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 2 MPH Wind Direction: WN Barometric Pressure: 29.80 "Hg

Air Temperature: 67 °F General Weather Conditions: Sunny

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

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

Instrument Serial Number: 5421 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	|Cal Gas Conc.-Cal Gas Reading|	Response Time (seconds)
1	-0.1	500	0	9
2	-0.1	498	2	8
3	-0.1	501	1	8

Average Difference: 3

*Perform recalibration if average difference is greater than 10

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

= 100%- 1 /500 x 100%

= 99.8 %

Span Sensitivity:

Trial 1:
Counts Observed for the Span= 139809
Counters Observed for the Zero= 3421

Trial 2:
Counts Observed for the Span= 134277
Counters Observed for the Zero= 3419

Trial 3:
Counts Observed for the Span= 138792
Counters Observed for the Zero= 3341

Post Monitoring Calibration Check

Zero Air Reading: 1.3 ppm Cal Gas Reading: 500 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: flare Reading: 2.4 ppm

Downwind Location Description: grid Reading: 1.3 ppm

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

SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA

Date: 10-03-24 Site Name: Newby

Inspector(s): Andrew S Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 2 MPH Wind Direction: WN Barometric Pressure: 29.80 "Hg

Air Temperature: 67 °F General Weather Conditions: Sunny

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

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

Instrument Serial Number: 1215 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	|Cal Gas Conc.-Cal Gas Reading|	Response Time (seconds)
1	-0.1	498	2	7
2	0	501	1	8
3	-0.1	500	0	7

Average Difference: 3

*Perform recalibration if average difference is greater than 10

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

= 100%- 1 /500 x 100%

= 99.8 %

Span Sensitivity:

Trial 1:
Counts Observed for the Span= 135034
Counters Observed for the Zero= 2615

Trial 2:
Counts Observed for the Span= 133216
Counters Observed for the Zero= 2452

Trial 3:
Counts Observed for the Span= 134985
Counters Observed for the Zero= 2536

Post Monitoring Calibration Check

Zero Air Reading: 2.0 ppm Cal Gas Reading: 502 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: Plant Reading: 2.4 ppm

Downwind Location Description: grid Reading: 4.3 ppm

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

SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA

Date: 10/11/24 Site Name: NEWBY

Inspector(s): A. STONE Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 6 MPH Wind Direction: S Barometric Pressure: 30.02 "Hg

Air Temperature: 51 °F General Weather Conditions: CLEAR

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

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

Instrument Serial Number: 5421 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	|Cal Gas Conc.-Cal Gas Reading|	Response Time (seconds)
1	-0.1	502	2	7
2	0	500	0	6
3	-0.1	500	0	7

Average Difference: 2

*Perform recalibration if average difference is greater than 10

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

= 100%- .6 /500 x 100%

99.88%

Span Sensitivity:

Trial 1:	Trial 3:
Counts Observed for the Span= 127842	Counts Observed for the Span= 125962
Counters Observed for the Zero= 3605	Counters Observed for the Zero= 3583
Trial 2:	
Counts Observed for the Span= 126344	
Counters Observed for the Zero= 3594	

Post Monitoring Calibration Check

Zero Air Reading: -0.5 ppm Cal Gas Reading: 496 ppm

BACKGROUND CONCENTRATIONS CHECKS

Upwind Location Description: FLARE Reading: 6.8 ppm

Downwind Location Description: ENTRANCE Reading: 1.9 ppm

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

SURFACE EMISSIONS MONITORING
CALIBRATION AND PERTINENT DATA

Date: 10/11/24 Site Name: NEWBY

Inspector(s): E-PAZ Instrument: TVA 2020

WEATHER OBSERVATIONS

Wind Speed: 6 MPH Wind Direction: S Barometric Pressure: 30.02 "Hg

Air Temperature: 52 °F General Weather Conditions: CLEAR

CALIBRATION INFORMATION

Pre-monitoring Calibration Precision Check

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

Instrument Serial Number: 1211 Cal Gas Concentration: 500ppm

Trial	Zero Air Reading	Cal Gas Reading	|Cal Gas Conc.-Cal Gas Reading|	Response Time (seconds)
1	-0.1	503	3	7
2	0	499	1	6
3	-0.1	500	0	7

Average Difference: 4

*Perform recalibration if average difference is greater than 10

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

= 100%- 1.3 /500 x 100%

= 99.74 %

Span Sensitivity:

Trial 1:
Counts Observed for the Span= 144322
Counters Observed for the Zero= 3300

Trial 2:
Counts Observed for the Span= 142784
Counters Observed for the Zero= 3361

Trial 3:
Counts Observed for the Span= 143233
Counters Observed for the Zero=

Post Monitoring Calibration Check

Zero Air Reading: -1.0 ppm Cal Gas Reading: 509 ppm

BACKGROUND CONCENTRATIONS CHECKS

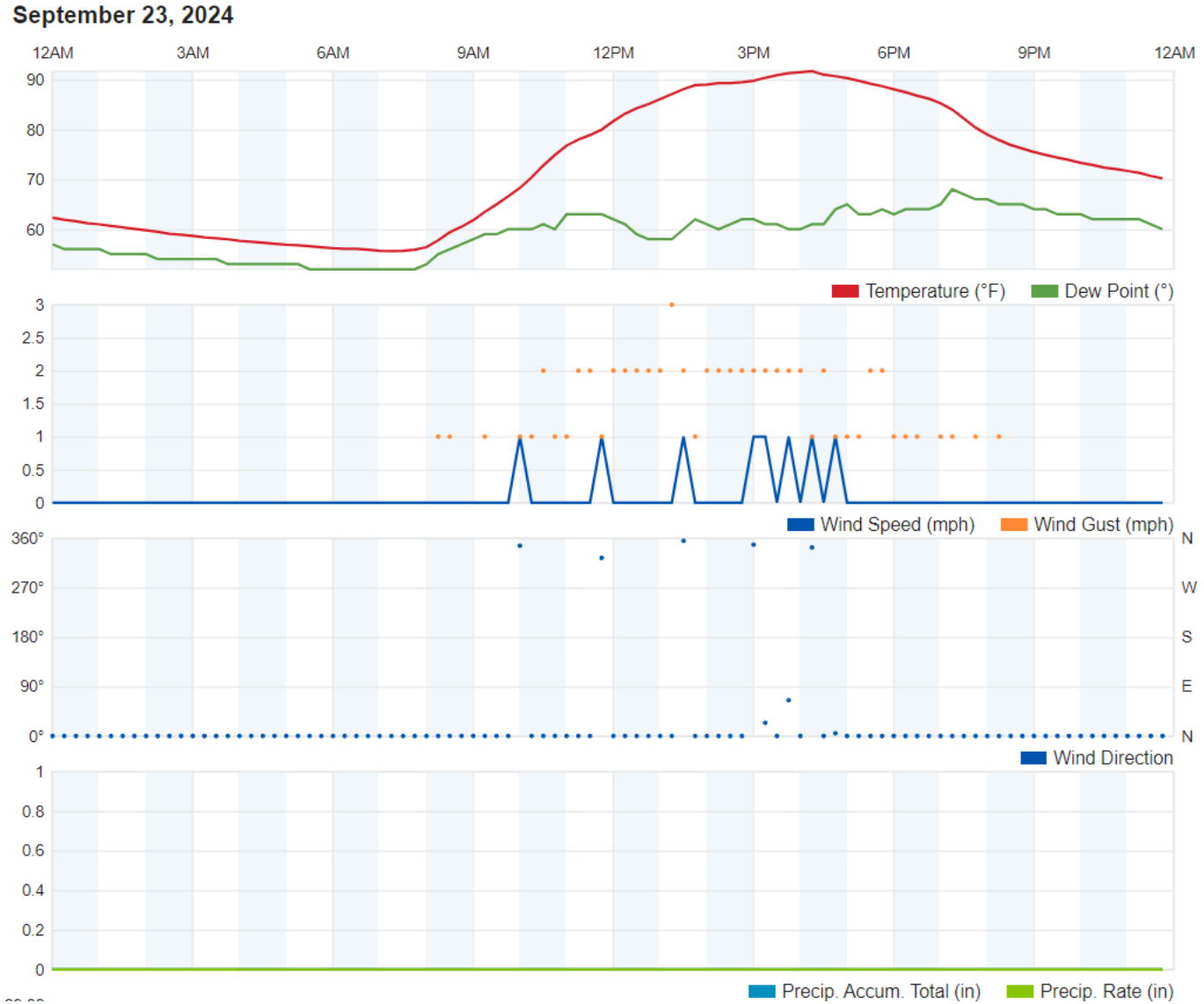
Upwind Location Description: FLARE Reading: 6.8 ppm

Downwind Location Description: ENTRANCE Reading: 1.9 ppm

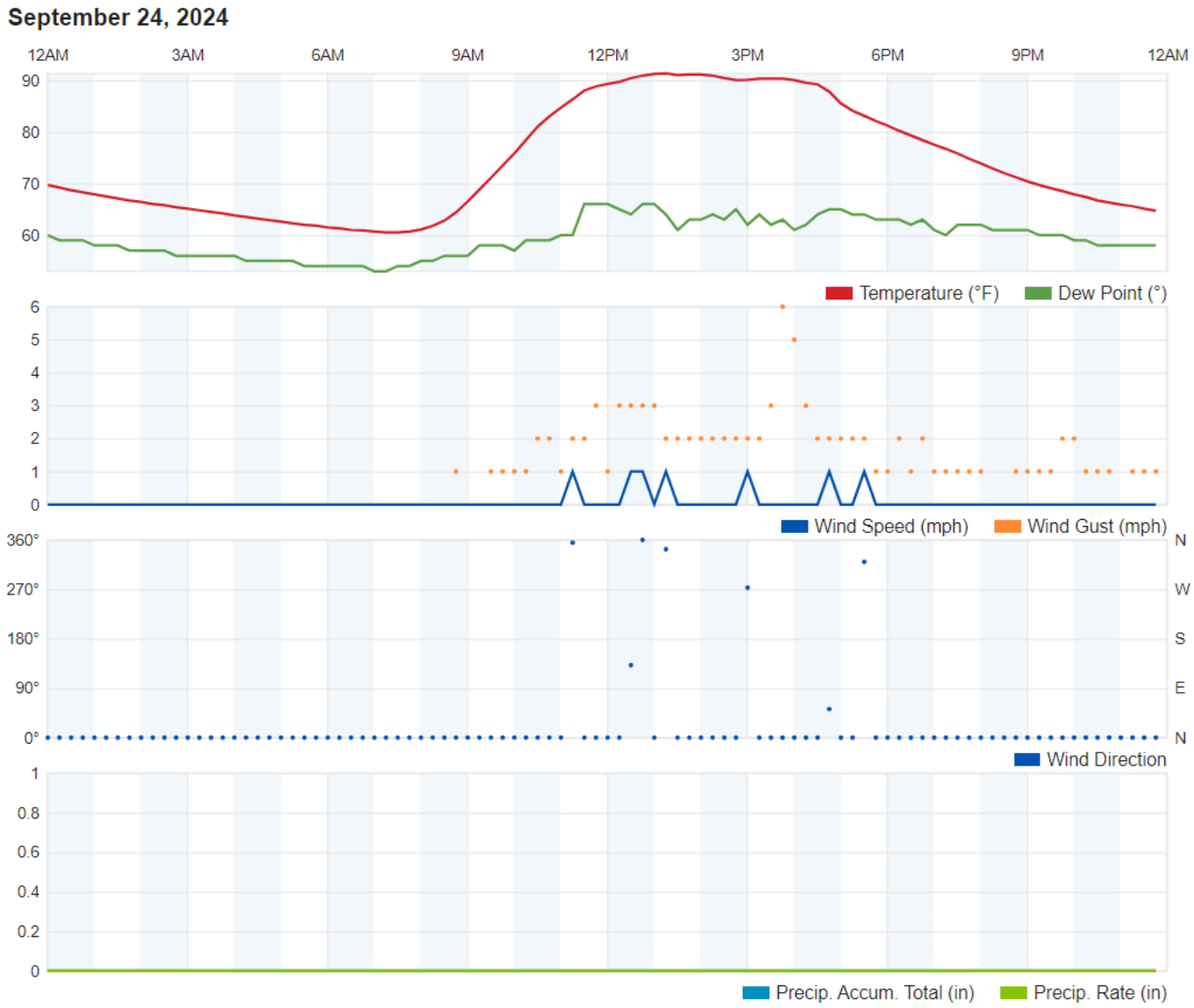
Notes: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous speeds exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hours of the monitoring event. Therefore, site meteorological conditions were within the requested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

Attachment 6

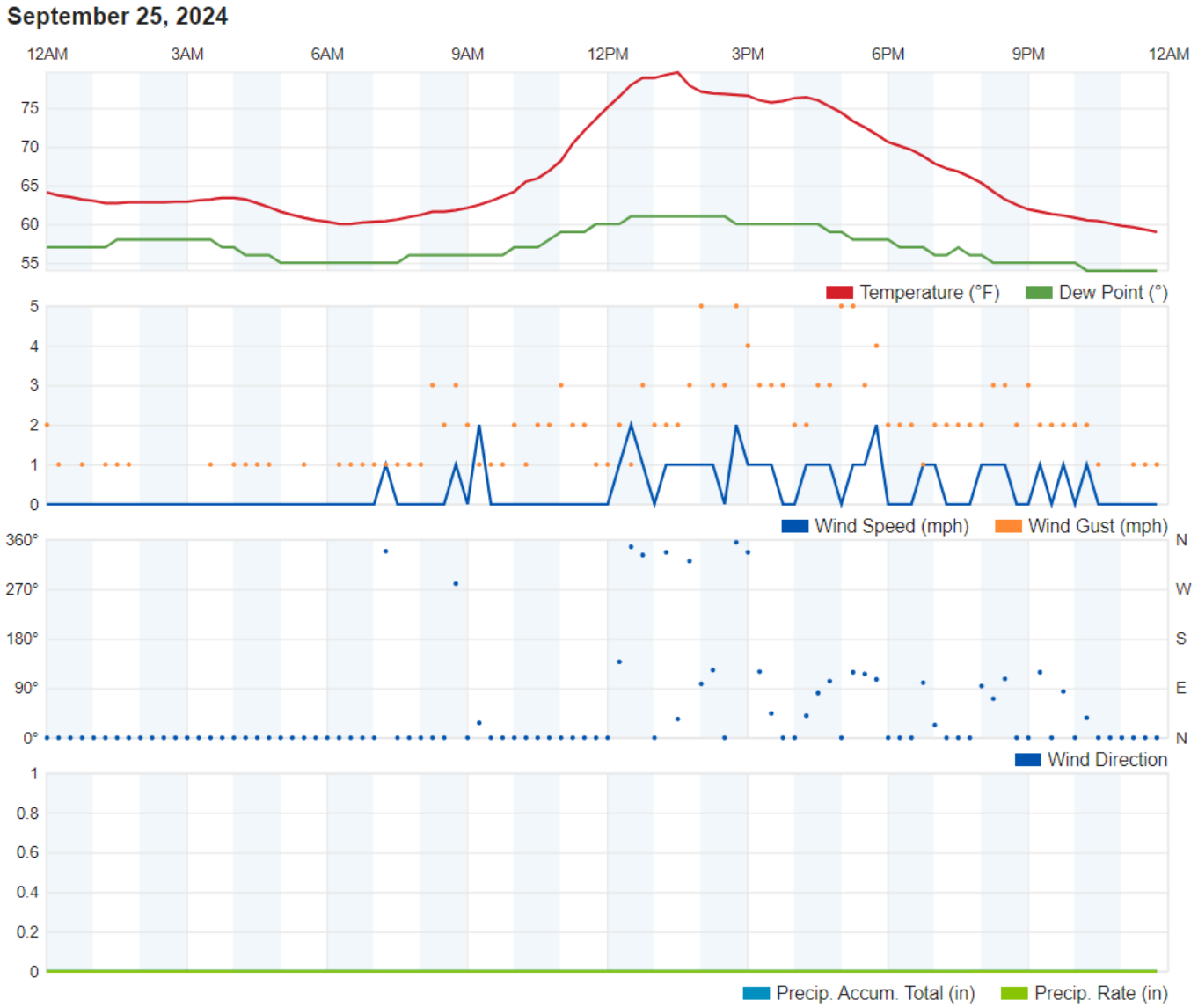
Weather Data



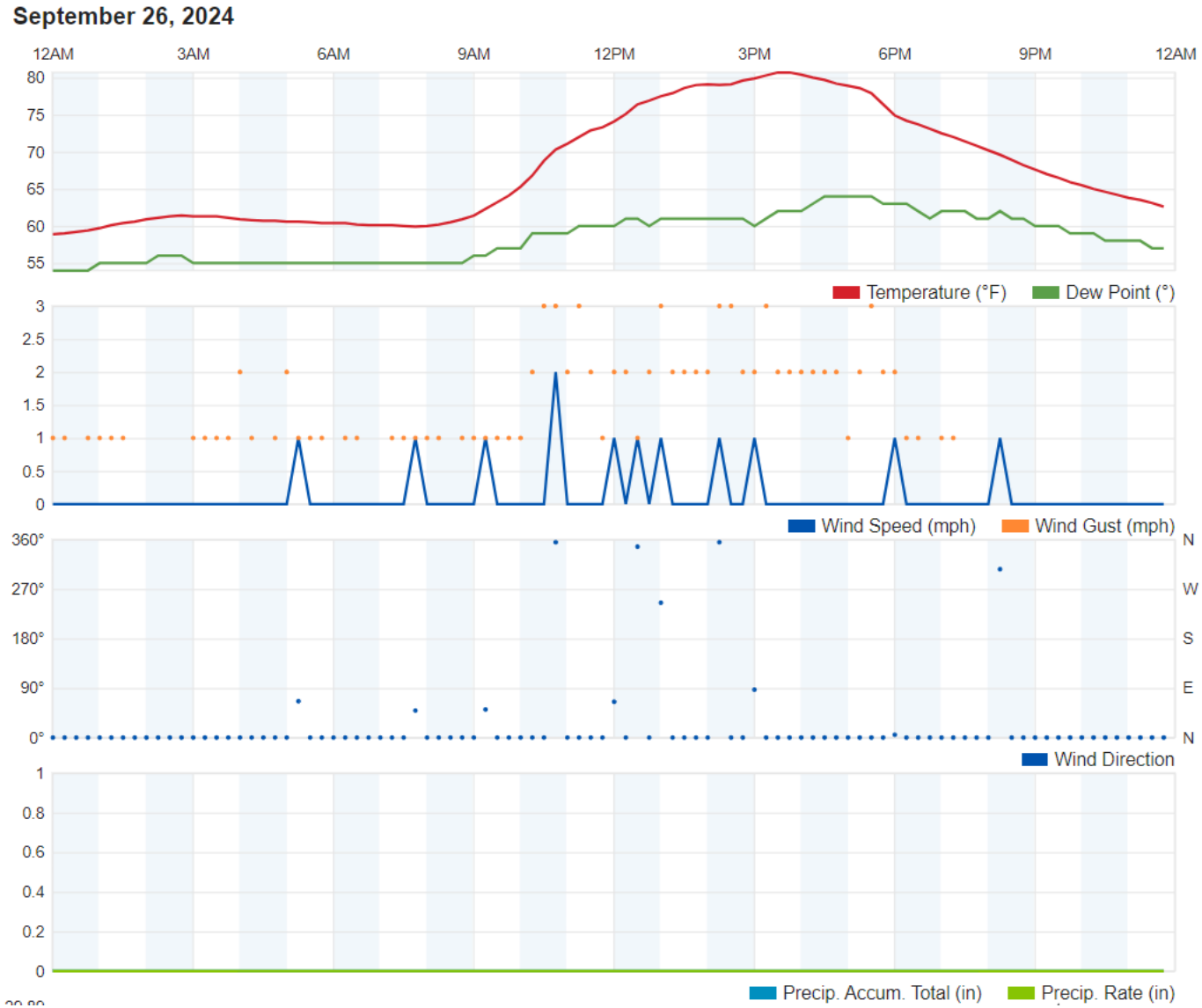
Third Quarter 2024
LMR Surface Emissions Monitoring Weather Data
September 23, 2024
Newby Island Landfill, Milpitas, California



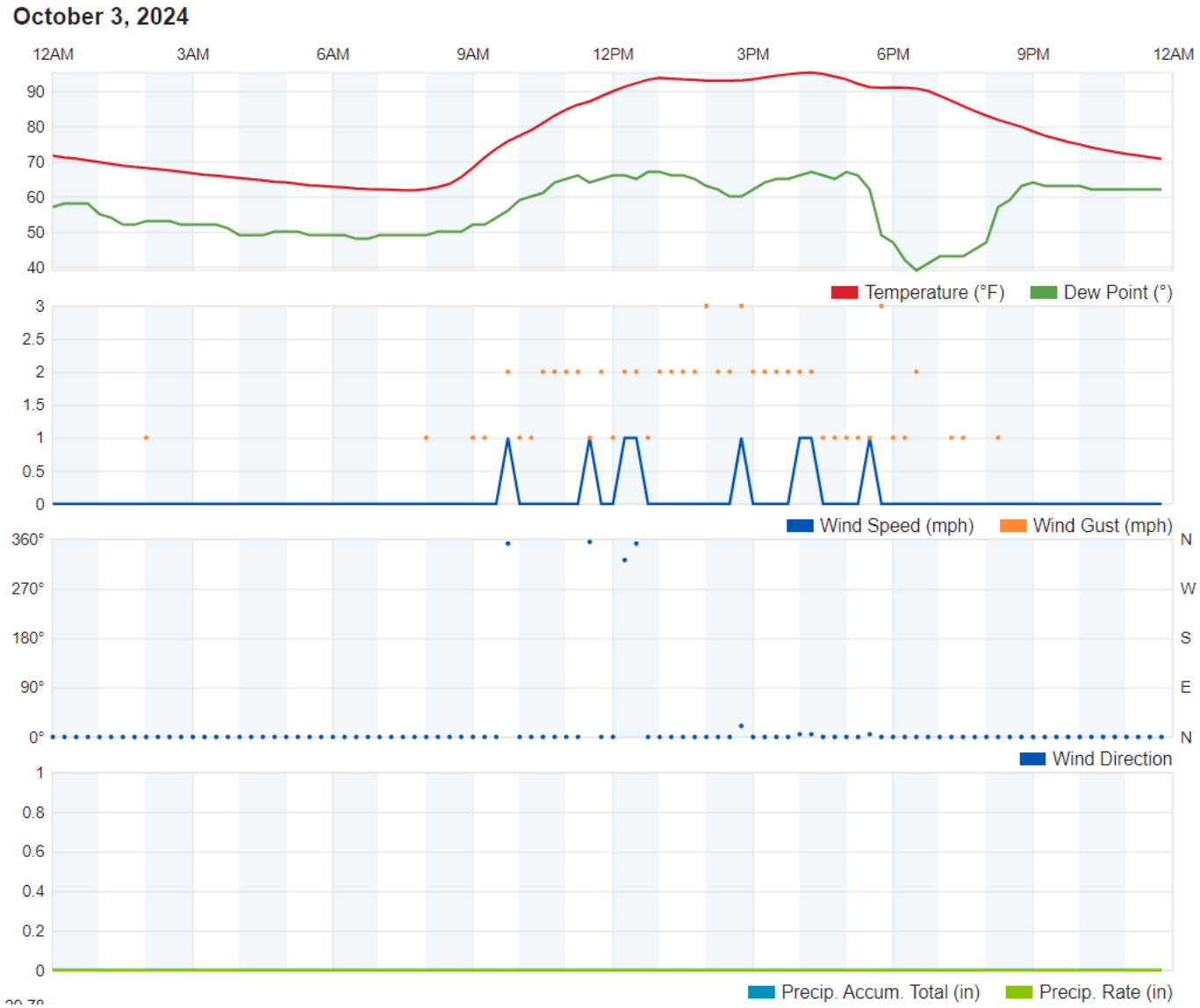
Third Quarter 2024
LMR Surface Emissions Monitoring Weather Data
September 24, 2024
Newby Island Landfill, Milpitas, California



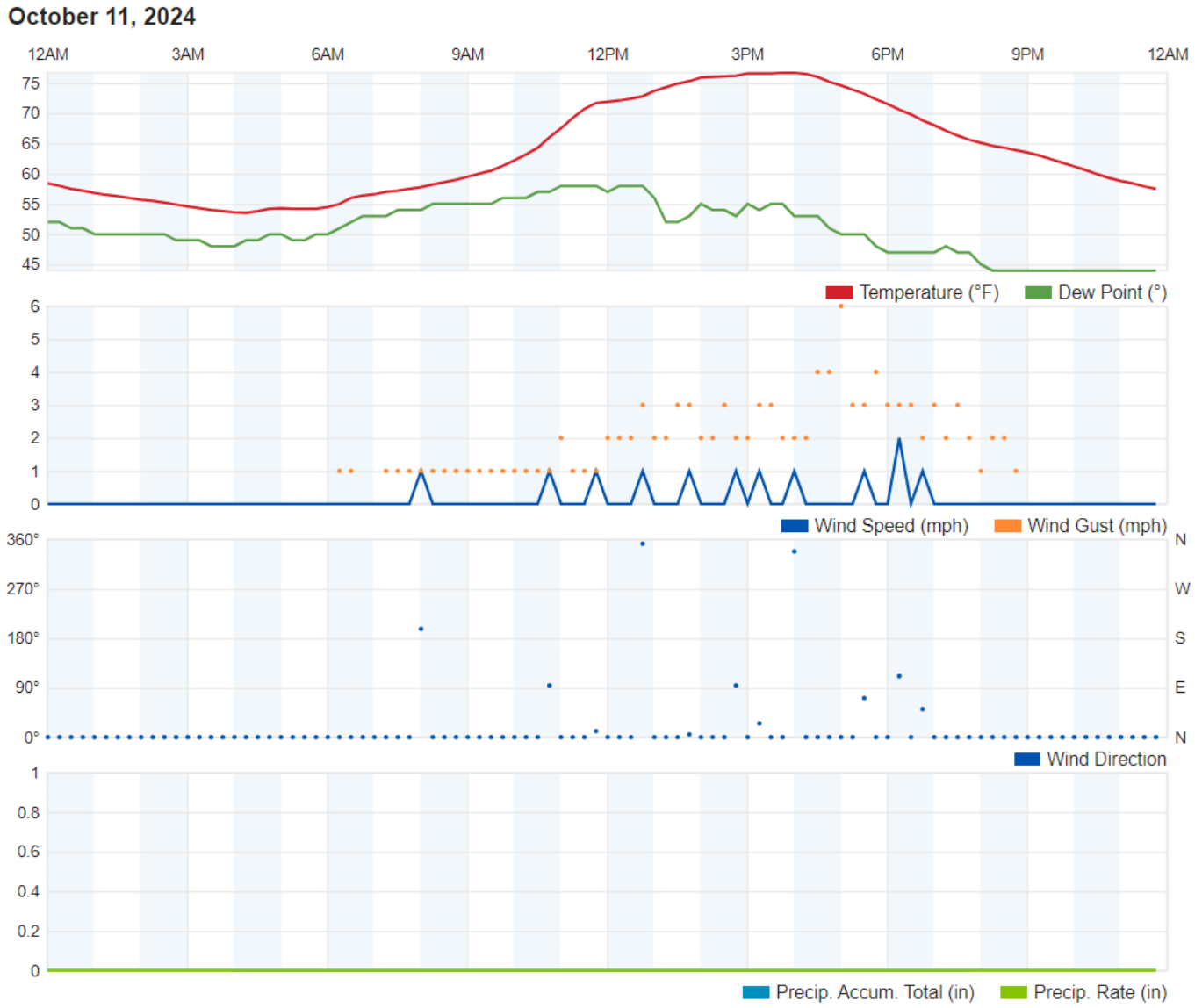
Third Quarter 2024
LMR Surface Emissions Monitoring Weather Data
September 25, 2024
Newby Island Landfill, Milpitas, California



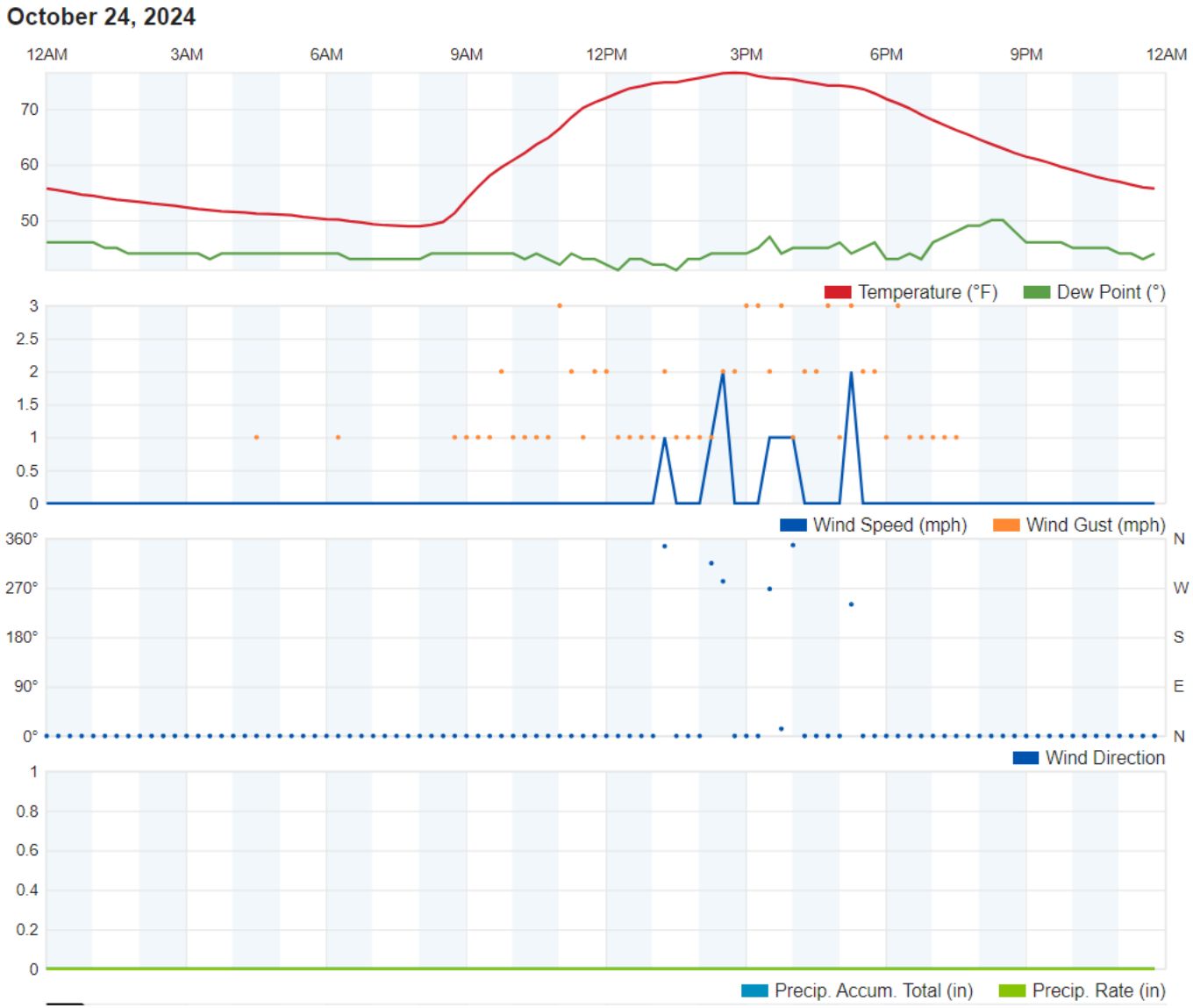
Third Quarter 2024
LMR Surface Emissions Monitoring Weather Data
September 26, 2024
Newby Island Landfill, Milpitas, California



Third Quarter 2024
LMR Surface Emissions Monitoring Weather Data
October 3, 2024
Newby Island Landfill, Milpitas, California



Third Quarter 2024
LMR Surface Emissions Monitoring Weather Data
October 11, 2024
Newby Island Landfill, Milpitas, California



Third Quarter 2024
LMR Surface Emissions Monitoring Weather Data
October 24, 2024
Newby Island Landfill, Milpitas, California

February 13, 2025
File No. 07221077.00

Mr. Jon Freedman
Republic Services – Newby Island Landfill
1601 Dixon Landing Road
Milpitas, California 95035

Subject: Newby Island Landfill - Milpitas, California

Landfill Methane Rule (LMR) and New Source Performance Standards (NSPS) Surface Emissions Monitoring for Fourth Quarter 2024.

Dear Mr. Freedman:

SCS Field Services (SCS) is pleased to provide the Republic Services, with the enclosed report summarizing the surface emissions monitoring services provided at the Newby Island Landfill (Site) during the Fourth Quarter of 2024. This report includes the results of the surface scan, component emissions, and blower/flare station emissions monitoring for the Site for this monitoring period.

SCS appreciates the opportunity to be of assistance to Republic Services on this project. As you review the enclosed information, please contact Sean Bass at (209) 345-2458 or Whitney Stackhouse at (209) 338-7990 if you have any questions or comments.

Sincerely,

Whitney Stackhouse
Project Manager
SCS Field Services

Sean T. Bass
Senior Project Manager
SCS Field Services

Encl.

Newby Island Landfill, LMR/NSPS SEM, Fourth Quarter 2024

Newby Island Landfill

Landfill Methane Rule (LMR) and New Source Performance Standards (NSPS) Surface Emissions Monitoring

Fourth Quarter 2024

Presented to:

Mr. Jon Freedman
Republic Services – Newby Island
1601 Dixon Landing Road
Milpitas, California 95035

SCS FIELD SERVICES

File No. 07221077.00 Task 01 | February 13, 2025

SCS FIELD SERVICES
4730 Enterprise Way Suite A
Modesto, CA 95356

Newby Island Landfill

Landfill Methane Rule (LMR) and New Source Performance Standards (NSPS) Surface Emissions Monitoring Fourth Quarter 2024

INTRODUCTION

This letter provides results of the December 17, 18, 18, 23, 26, 27, 2024 and January 17, 20, and 28, 2025, LMR and NSPS landfill surface emissions monitoring (SEM) performed by SCS Field Services (SCS) at the subject site. All work was performed in accordance with our approved Work Scope dated December 23, 2020, and the LMR requirements.

SUMMARY AND CONCLUSIONS

As stipulated in LMR, if uncorrectable exceedances within the 10-day limitation are detected or emissions are discovered during an inspection by Regulatory Agencies, the landfill must perform monitoring on a 25-foot pathway on a quarterly basis for active disposal sites. Upon completion of four consecutive SEM events without an uncorrectable exceedance of the 25 ppmv or 500 ppmv standards, other than non-repeatable momentary readings, the landfill may perform the monitoring on a 100-foot spacing on an annual basis for closed landfills or quarterly for active disposal sites. Therefore, based on the previous monitoring events, in which exceedances were observed, the monitoring at the Newby Island Landfill was performed on 25-foot pathways in accordance with the LMR.

On December 17, 18, 19, 23, and 26, 2024, SCS performed the fourth quarter of 2024 SEM as required by the Bay Area Air Quality Management District (BAAQMD). Instantaneous surface emissions monitoring results indicated that fifty-one (51) locations exceeded the 500 ppmv maximum concentration during the initial monitoring event (Table 1 in Attachment 3). These results are discussed in a subsequent section of this report.

Also, during the instantaneous monitoring event, SCS performed concurrent integrated monitoring of the landfill surface. As required by the LMR, the landfill was divided into 50,000 square foot areas. The Newby Island Landfill surface area was therefore divided into 277 grids, as shown in Figure 1 in Attachment 1. During this monitoring event, several grids were not monitored, per the regulations, due to ongoing active landfilling activities, unsafe conditions, or there was no waste in place before the monitoring event.

During the monitoring event, there were twenty-eight (28) grid areas observed to exceed the 25 ppmv LMR integrated average threshold (Table 2 in Attachment 4). These results are discussed in a subsequent section of this report.

In addition to surface monitoring, quarterly monitoring was conducted at the pressurized piping or components of the Gas Collection and Control System (GCCS) that are under positive pressure. Results of the testing of the landfill gas (LFG) Blower Flare Station (BFS) pressurized pipe and

components indicated one exceedance of the LMR 500-ppmv limit or the BAAQMD 1,000-ppmv limit. Results are shown in Attachment 3 (Table 1). These results are discussed in a subsequent section of this report.

Further, as required under the LMR, any location on the landfill that has an observed instantaneous methane concentration above 200 ppmv, must be stake-marked and Global Positioning System (GPS) located on a site figure. During this reporting period, six (6) locations were observed to exceed the 200 ppmv, reporting threshold. When these readings are observed, the locations are reported to site personnel for tracking and/or remediation and will be reported in the next submittal of the annual LMR report.

Finally, to help prevent potential future exceedances, SCS recommends that the landfill surface be routinely inspected and any observed surface erosion be routinely repaired.

BACKGROUND

The Newby Island Landfill is an active organic refuse disposal site. By way of background, organic materials buried in a landfill decompose anaerobically (in the absence of oxygen) producing a combustible gas that contains approximately 50 to 60 percent methane gas, 40 to 50 percent carbon dioxide, and a trace amount of various other gases, some of which are odorous. The Newby Island property contains a system to control the combustible gases generated in the landfill.

SURFACE EMISSIONS MONITORING

On December 17, 18, 19, 23, and 26, 2024, the instantaneous and integrated SEM was performed over the surface of the subject site. The monitoring intended to identify any specific locations or areas of the landfill surface with organic compound concentrations exceeding the LMR threshold limit values of 500 ppmv measured as methane for instantaneous monitoring, or an average methane concentration of 25 ppmv for the integrated monitoring in the 50,000 square foot grids as required under the LMR. During this event, SCS performed the monitoring on a 25-foot pathway in accordance with the rules as required.

EMISSIONS TESTING INSTRUMENTATION/CALIBRATION

The instruments used to perform the landfill surface emission testing consisted of the following:

- Thermo Scientific TVA 2020 portable Flame Ionization Detector (FID). This instrument measures methane in the air over a range of 1 to 50,000 ppmv. The TVA 2020 meets the State of California Air Resources Board (CARB) requirements for combined instantaneous and integrated monitoring and was calibrated in accordance with the United States Environmental Protection Agency (US EPA) Method 21.

- Weather Anemometer with continuous recorder for meteorological conditions in accordance with the LMR.

Instrument calibration logs and weather information are shown in Attachments 5 and 6.

SURFACE EMISSIONS MONITORING PROCEDURES

Surface emissions monitoring was conducted in accordance with the LMR and NSPS requirements. Monitoring was performed with the FID inlet held within 3 inches of the landfill surface while a

technician walked a grid in parallel paths not more than 25 -feet apart over the landfill's surface. Cracks, holes, and other cover penetrations in the surface were also tested. Surface emissions readings were monitored continuously and recorded every 5 seconds. Any areas exceeding the 200 or 500 ppmv standards (reporting and compliance levels, respectively) would be GPS-tagged and stake-marked for on-site personnel to perform remediation or repairs.

The integrated average is based on the readings stored on the instrument, which are recorded every 5 seconds. The readings are then downloaded and the averages are calculated for each grid using SCS eTools®. All readings are maintained in this secure SCS Database. The readings are not provided in the report due to the volume of readings but can be furnished upon request.

Recorded wind speed results are shown in Attachment 6. Wind speed averages were observed to remain below the alternative threshold of 10 miles per hour, and no instantaneous speeds exceeded 20 miles per hour. No rainfall occurred within 72 hours of the monitoring events. Therefore, site meteorological conditions were within the alternatives of the LMR requirements on the above-mentioned dates.

TESTING RESULTS

During this event, SCS performed the monitoring on a 25-foot pathway in accordance with the rule as required under the LMR and NSPS. The monitoring intended to identify any specific locations or areas of the landfill surface with organic compound concentrations exceeding the LMR or NSPS threshold limit values of 500 ppmv measured as methane for instantaneous monitoring, or an average methane concentration of 25 ppmv for the integrated monitoring (LMR).

On December 17, 18, and 19, 2024, SCS performed the fourth quarter of 2024 instantaneous emissions monitoring testing as required by the BAAQMD. During this monitoring, surface emissions results indicated that fifty-one (51) locations exceeded the 500 ppmv maximum concentration. The required first and second 10-day (LMR/NSPS) and 30-day (NSPS) follow-up monitoring performed on December 26, 27, 2024 and January 17, 20, and 28, 2025, indicated that not all locations returned below compliance limits as required, following system adjustments and remediation (wellfield adjustment and borehole repairs using bentonite and soil) performed by SCS and site personnel. Based on these monitoring results, and in accordance with NSPS, the site is required to perform a system expansion within 120 days of the initial detected exceedance or April 16, 2025. Results of the initial and follow-up monitoring are shown in Attachment 3 (Table 1). Calibration logs for the monitoring equipment are provided in Attachment 5.

Additionally, calculated integrated grid monitoring indicated twenty-eight (28) integrated exceedances of the 25-ppmv requirement on December 19, 23, and 26, 2024. The required first and second 10-day LMR follow-up monitoring (delaped due to rain/weather) performed on December 26, 27, 2024 and January 17, 20, and 28, 2025, indicated that not all areas had returned to compliance following system adjustments and remediation by site personnel. In accordance with LMR requirements for expansion and remediation, the exceedance locations need to be remediated and returned to compliance in accordance with the rule (expansion of the collection system or an alternative compliance option if approved by the BAAQMD) within 120 days of the third observed integrated exceedance, which will be due by May 17, 2025. However since the NSPS regulation is from the initial exceedance (from the instantaneous exceedances), we will be using the April 16, 2025, due date for expansion. The initial and follow-up monitoring results are shown in Attachment 4, Table 2. Calibration logs for the monitoring equipment are provided in Attachment 5.

During this monitoring event, several grids were not monitored, in accordance with the LMR, due to active landfilling activities, unsafe conditions, or no waste in place. SCS will continue to monitor all accessible locations during the first quarter of 2025.

PRESSURIZED PIPE AND COMPONENT LEAK MONITORING

On December 19, 2024, quarterly leak monitoring was performed in accordance with the LMR. SCS performed LFG pressurized pipe and component leak monitoring at the BFS. Monitoring was performed with the detector inlet held one-half of an inch from the pressurized pipe and associated components. One (1) location exceeding the 500 ppmv threshold was observed during our monitoring event. The required 7-day recheck follow-up monitoring was performed on December 23, 2024, and showed that the location returned to compliance following repairs made by SCS. Therefore, all pressurized pipes and components located at the LFG BFS were in compliance at the time of our testing. Results of the monitoring are shown in Table 1 for component results.

PROJECT SCHEDULE

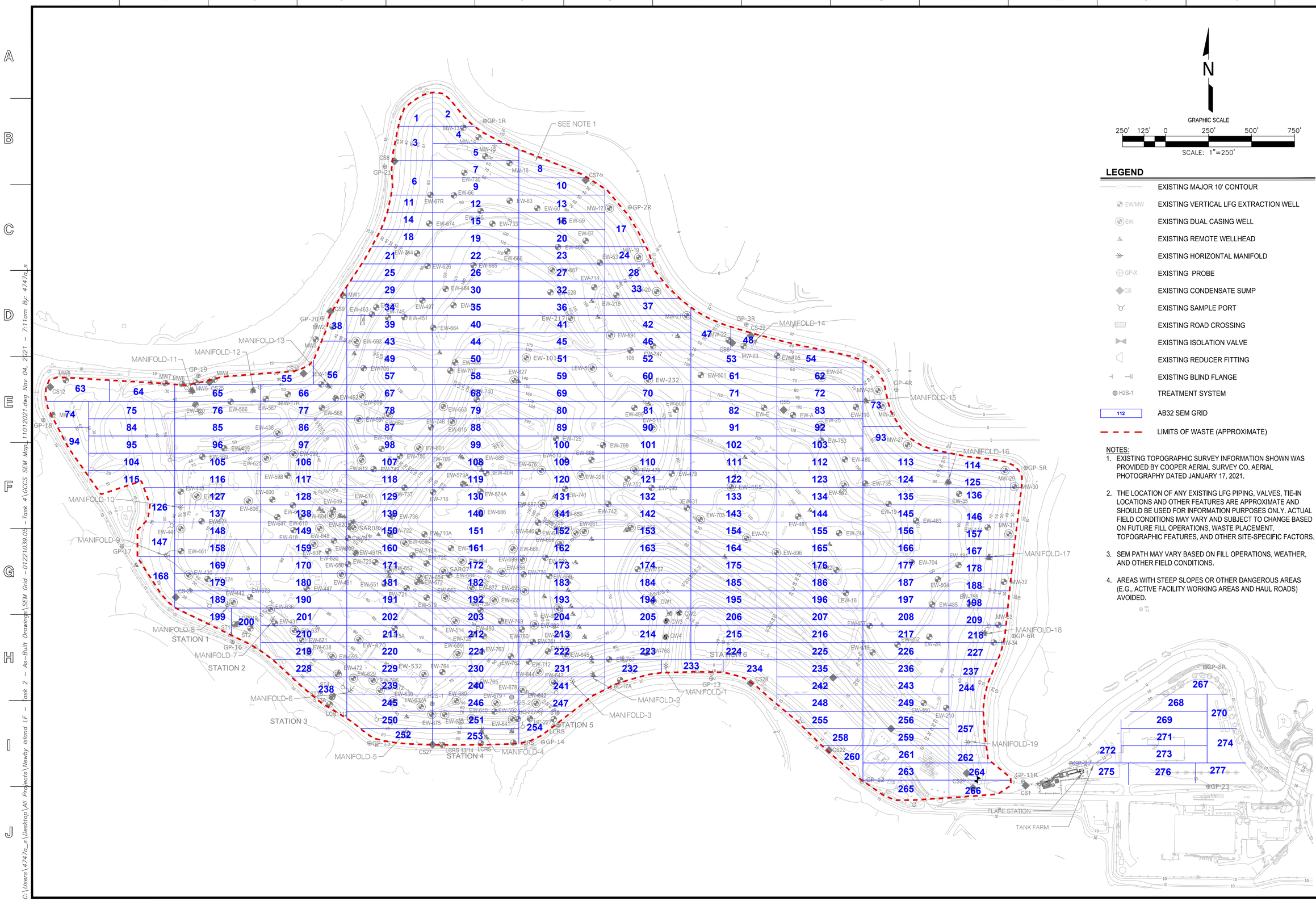
According to the LMR and NSPS, surface emissions monitoring at active landfills is required to be performed on a quarterly basis. Therefore, in accordance with our approved Work Scope, the first quarter 2025 (January through March) surface emissions testing event is scheduled to be performed by the end of March 2025 in accordance with the Republic SOP unless an alternative timeline is requested by site personnel.

STANDARD PROVISIONS

This report addresses the conditions of the subject site during the testing dates only. Accordingly, we assume no responsibility for any changes that may occur subsequent to our testing which could affect the surface emissions at the subject site or adjacent properties.

Attachment 1

Landfill Grid



N

GRAPHIC SCALE

250' 125' 0 250' 500' 750'

SCALE: 1"=250'

LEGEND

- EXISTING MAJOR 10' CONTOUR
- EW/MW — EXISTING VERTICAL LFG EXTRACTION WELL
- EW — EXISTING DUAL CASING WELL
- EXISTING REMOTE WELLHEAD
- EXISTING HORIZONTAL MANIFOLD
- GP-X — EXISTING PROBE
- CS — EXISTING CONDENSATE SUMP
- EXISTING SAMPLE PORT
- EXISTING ROAD CROSSING
- EXISTING ISOLATION VALVE
- EXISTING REDUCER FITTING
- EXISTING BLIND FLANGE
- H2S-1 — TREATMENT SYSTEM
- 112 — AB32 SEM GRID
- LIMITS OF WASTE (APPROXIMATE)

NOTES:

1. EXISTING TOPOGRAPHIC SURVEY INFORMATION SHOWN WAS PROVIDED BY COOPER AERIAL SURVEY CO. AERIAL PHOTOGRAPHY DATED JANUARY 17, 2021.
2. THE LOCATION OF ANY EXISTING LFG PIPING, VALVES, TIE-IN LOCATIONS AND OTHER FEATURES ARE APPROXIMATE AND SHOULD BE USED FOR INFORMATION PURPOSES ONLY. ACTUAL FIELD CONDITIONS MAY VARY AND SUBJECT TO CHANGE BASED ON FUTURE FILL OPERATIONS, WASTE PLACEMENT, TOPOGRAPHIC FEATURES, AND OTHER SITE-SPECIFIC FACTORS.
3. SEM PATH MAY VARY BASED ON FILL OPERATIONS, WEATHER, AND OTHER FIELD CONDITIONS.
4. AREAS WITH STEEP SLOPES OR OTHER DANGEROUS AREAS (E.G., ACTIVE FACILITY WORKING AREAS AND HAUL ROADS) AVOIDED.

DATE

REVISION

NO.

SHEET TITLE: GCCS SEM MAP

PROJECT TITLE: NEWBY ISLAND LANDFILL MILPITAS, CALIFORNIA

CLIENT:

SCS ENGINEERS
ENVIRONMENTAL CONSULTANTS
4683 CHABOT DRIVE SUITE 200
PLEASANTON, CA 94588
(925)426-0080

PROJ. NO: 01221039.05 T4

DSN. BY: AAS

DWN. BY: AAS

CHK. BY: MD

APP. BY: MD

ACAD FILE: ENGINEERS

DATE: 11-04-21

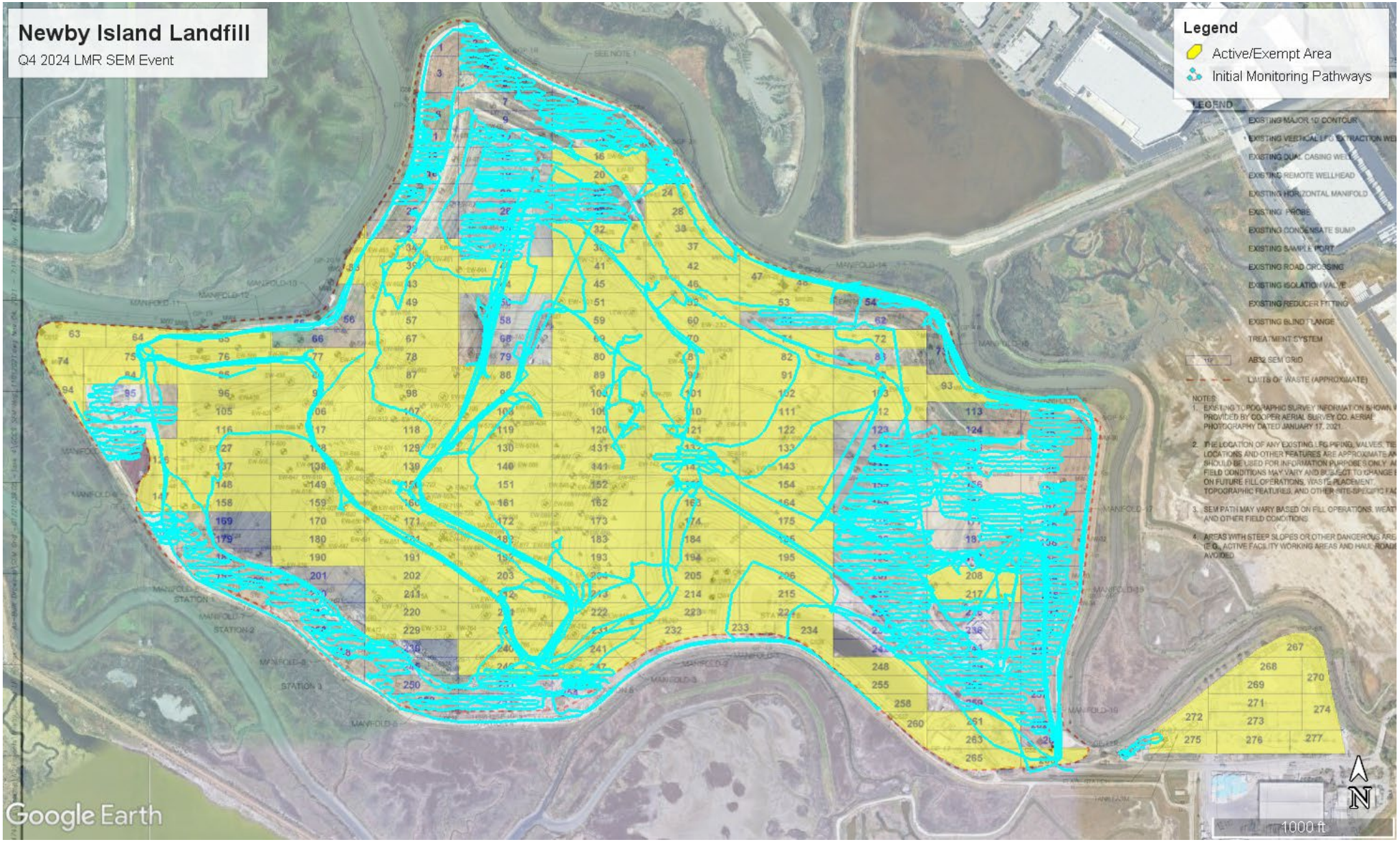
SCALE: AS SHOWN

SHEET: 1

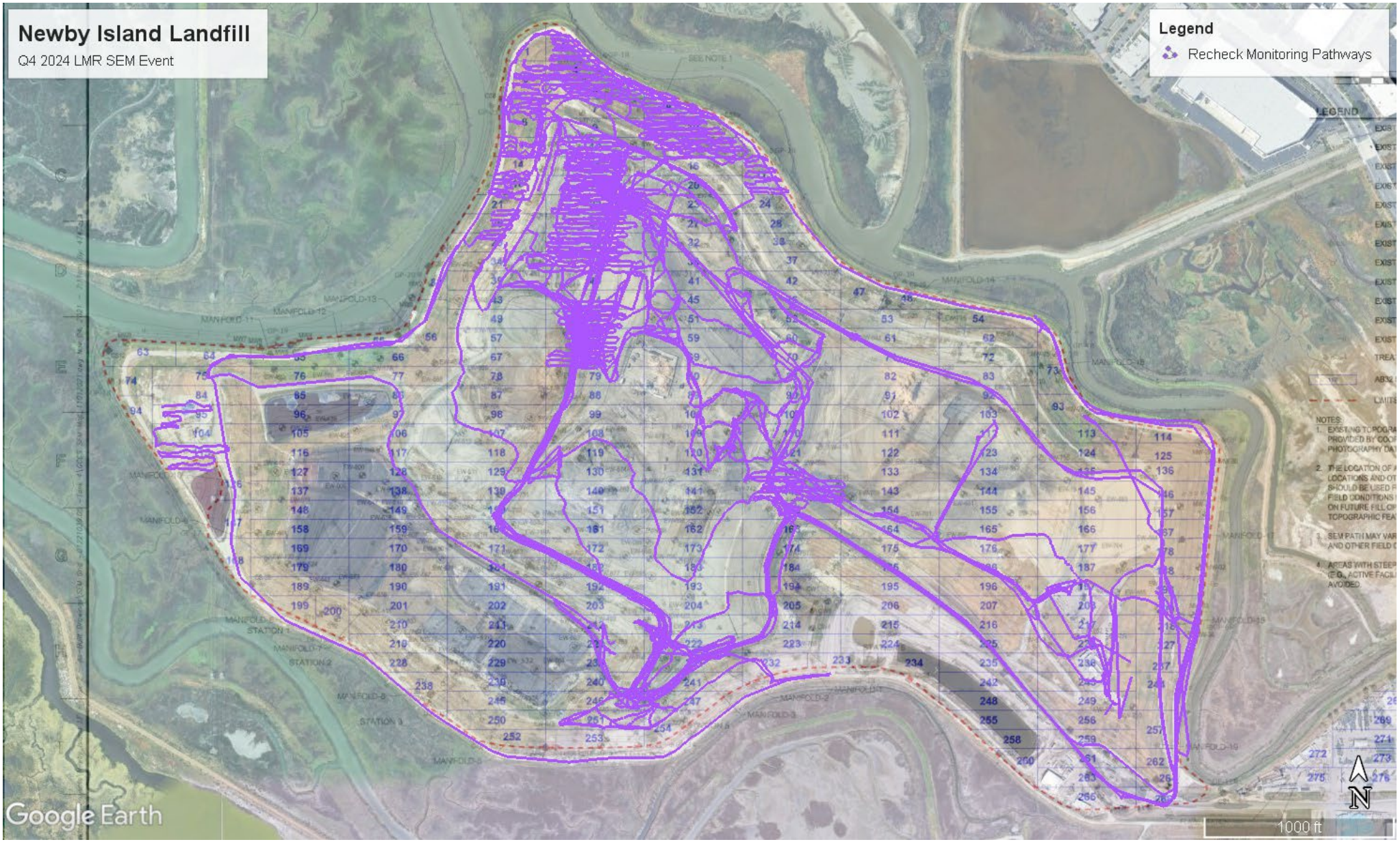
C:\Users\4747a_s\Desktop\All Projects\Newby Island LF - Task 2 - As-Built Drawings\SEM Grid - 01221039.05 - Task 4\GCCS SEM Map_11012021.dwg Nov 04, 2021 - 7:11am By: 4747a_s

Attachment 2

Surface Pathway



Fourth Quarter 2024
LMR Surface Emissions Monitoring Pathway
Newby Island Landfill, Milpitas, California



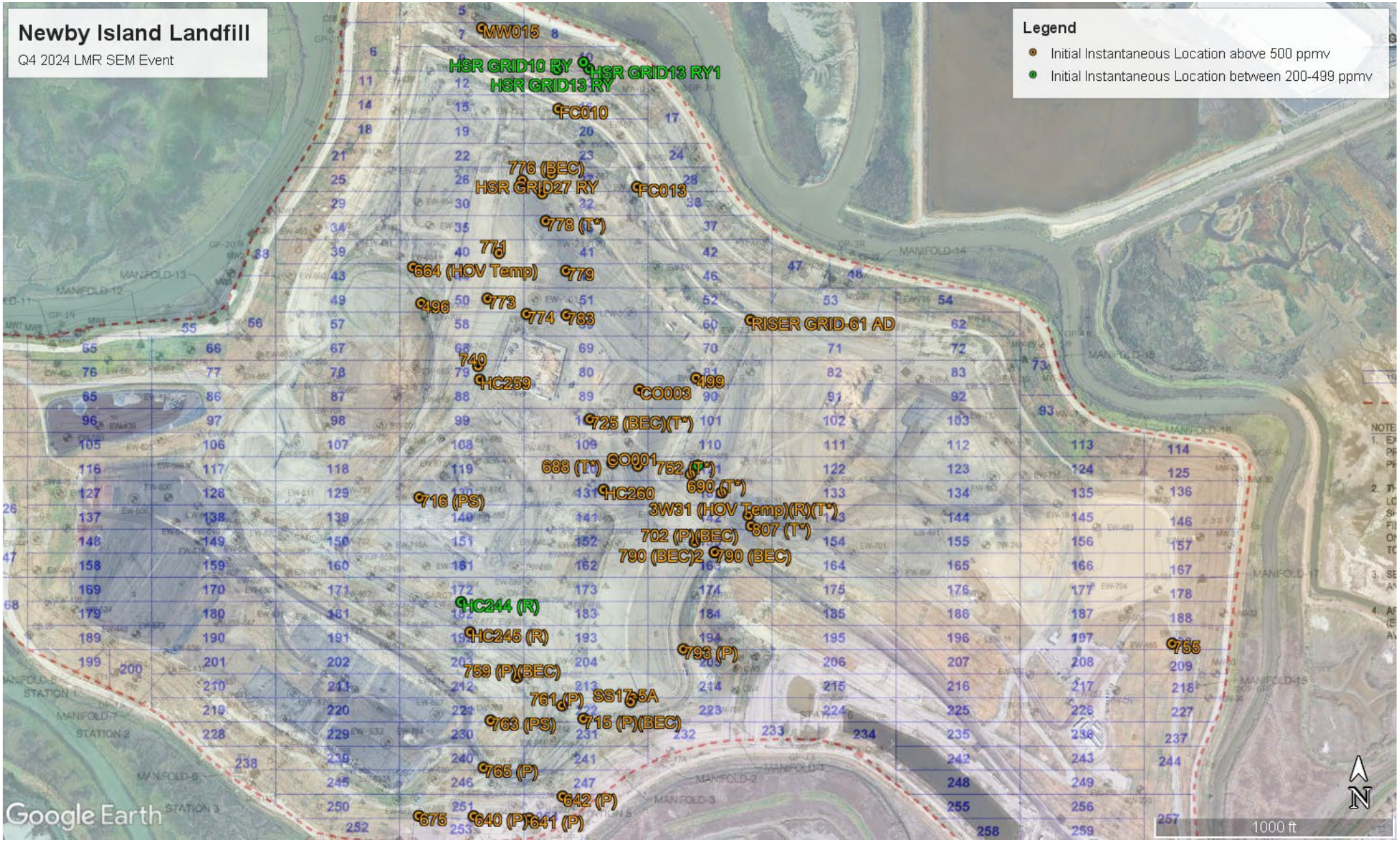
Fourth Quarter 2024

LMR Surface Emissions Monitoring First and Second 10-Day Pathways

Newby Island Landfill, Milpitas, California

Attachment 3

Instantaneous and Component Emissions Monitoring Results



Fourth Quarter 2024

Initial Emissions Monitoring Locations Greater Than 200 and 500 ppmv

Newby Island Landfill Milpitas, California

Fourth Quarter 2024

Table 1. LMR Instantaneous Surface and Component Emissions Monitoring Results

Newby Island Sanitary Landfill, Milpitas, California

Instantaneous Data Report for December 17, 18, 19, 26 and 27, 2024, and January 17, 20, and 28, 2025

Location (Surface)	Initial Monitoring Results (ppmv) December 17, 2024	First 10-Day Monitoring Results (ppmv) December 26, 2024	Second 10-Day Monitoring Results (ppmv) January 17, 2025 *Delayed due to rain/weather	30-Day Monitoring Results (ppmv) January 20, 2025	30-Day Monitoring Results (ppmv) January 28, 2025	120-Day Expansion Due Date	Latitude	Longitude
763 (PS)	544	34.2	N/A	62.7	N/A	N/A	37.456773	-121.943761
793 (P)	550	11.8	N/A	14.6	N/A	N/A	37.457581	-121.941004
761 (P)	613	788	840	N/A	347	**April 16, 2025**	37.456942	-121.94274
765 (P)	744	46.1	N/A	46.1	N/A	N/A	37.456238	-121.943862
HC245 (R)	746	36.9	N/A	12.2	N/A	N/A	37.457775	-121.944053
774	803	1,433	1,496	N/A	4179	**April 16, 2025**	37.461388	-121.943246
642 (P)	940	128	N/A	8.6	N/A	N/A	37.45591	-121.94273

Fourth Quarter 2024

Table 1. LMR Instantaneous Surface and Component Emissions Monitoring Results

Newby Island Sanitary Landfill, Milpitas, California

Location (Surface)	Initial Monitoring Results (ppmv) December 17, 2024	First 10-Day Monitoring Results (ppmv) December 26, 2024	Second 10-Day Monitoring Results (ppmv) January 17, 2025 *Delayed due to rain/weather	30-Day Monitoring Results (ppmv) January 20, 2025	30-Day Monitoring Results (ppmv) January 28, 2025	120-Day Expansion Due Date	Latitude	Longitude
640 (P)	1100	1,003	242	N/A	203	N/A	37.455685	-121.944003
675	1300	1,248	728	N/A	880	**April 16, 2025**	37.45569	-121.94479
715 (P)(BEC)	1416	3,545	155	N/A	815	**April 16, 2025**	37.456793	-121.942433
759 (P)(BEC)	1500	2,285	107	N/A	893	**April 16, 2025**	37.457263	-121.943382
641 (P)	1550	1,061	10.9	N/A	9.2	N/A	37.45566	-121.94321
795 (P)(R)(BEC)	2000	9,177	739	N/A	5313	**April 16, 2025**	37.457034	-121.941728
755	2900	5.3	N/A	3.7	N/A	N/A	37.457645	-121.934005
688 (T*)	3106	134	N/A	11700	N/A	N/A	37.459696	-121.942019

Fourth Quarter 2024

Table 1. LMR Instantaneous Surface and Component Emissions Monitoring Results

Newby Island Sanitary Landfill, Milpitas, California

Location (Surface)	Initial Monitoring Results (ppmv) December 17, 2024	First 10-Day Monitoring Results (ppmv) December 26, 2024	Second 10-Day Monitoring Results (ppmv) January 17, 2025 *Delayed due to rain/weather	30-Day Monitoring Results (ppmv) January 20, 2025	30-Day Monitoring Results (ppmv) January 28, 2025	120-Day Expansion Due Date	Latitude	Longitude
783	3133	1,895	100,000	N/A	7069	**April 16, 2025**	37.461375	-121.942675
HC260	3222	92.4	N/A	17000	N/A	N/A	37.459392	-121.942144
CO001	3456	67.2	N/A	11200	N/A	N/A	37.459663	-121.941654
SS17-5A	4500	8,961	67.2	N/A	259	N/A	37.456984	-121.941758
CO003	6654	68.3	N/A	12300	N/A	N/A	37.460529	-121.941632
725 (BEC)(T*)	6946	26.5	N/A	5485	N/A	N/A	37.460193	-121.942339

Fourth Quarter 2024

Table 1. LMR Instantaneous Surface and Component Emissions Monitoring Results

Newby Island Sanitary Landfill, Milpitas, California

Location (Surface)	Initial Monitoring Results (ppmv) December 17, 2024	First 10-Day Monitoring Results (ppmv) December 27, 2024	Second 10-Day Monitoring Results (ppmv) January 17, 2025 *Delayed due to rain/weather	30-Day Monitoring Results (ppmv) January 20, 2025	30-Day Monitoring Results (ppmv) January 27, 2025	Latitude	Longitude
Sump DG	10,000	150	N/A	15.5	N/A	37.4572920	-121.9336610
645 (PS)	10,000	849	23.8	N/A	34.1	37.4567100	-121.9421400
760 (P)(BEC)	10,000	3777	111	N/A	46.5	37.4571350	-121.9429600
MW027 (R)	20,000	265	N/A	8.1	N/A	37.4601350	-121.9353400

Location (Surface)	Initial Monitoring Results (ppmv) December 17, 2024	Second 10-Day Monitoring Results (ppmv) January 17, 2025 *Delayed due to rain/weather	Second 10-Day Monitoring Results (ppmv) January 20, 2025 *Delayed due to rain/weather	30-Day Monitoring Results (ppmv) January 28, 2025	120-Day Expansion Due:	Latitude	Longitude
785 (BEC)	17,000	2,945	52,500	1,285	**April 16, 2025**	37.4603450	-121.9412330
CO002	40,000	98,000	10,800	1,557	**April 16, 2025**	37.4600950	-121.9417110

Fourth Quarter 2024

Table 1. LMR Instantaneous Surface and Component Emissions Monitoring Results

Newby Island Sanitary Landfill, Milpitas, California

Location (Surface)	Initial Monitoring Results (ppmv) December 18, 2024	First 10-Day Monitoring Results (ppmv) December 26, 2024	Second 10-Day Monitoring Results (ppmv) January 17, 2025 *Delayed due to rain/weather	30-Day Monitoring Results (ppmv) January 20, 2025	30-Day Monitoring Results (ppmv) January 27, 2025	120-Day Expansion Due Date	Latitude	Longitude
RISER GRID-61 AD	54000	26,000	2,773	N/A	5606	**April 16,2025**	37.4613180	-121.9400420
773	15600	10,000	7,564	N/A	2839	**April 16,2025**	37.4615620	-121.9438050
771	14500	102,100	2,430	N/A	1879	**April 16,2025**	37.4620800	-121.9436390
752 (T*)	8744	39.6	--	1432	N/A	N/A	37.4595690	-121.9408960
496	7638	82,000	31.4	N/A	10000	**April 16,2025**	37.4615100	-121.9447530
FC013	7601	770	1,034	N/A	1273	**April 16,2025**	37.4628310	-121.9416650
740	6573	9,646	2,192	N/A	1261	**April 16,2025**	37.4607950	-121.9439390
690 (T*)	6117	50.3	N/A	181	N/A	N/A	37.4593600	-121.9404530
MW015	5479	2,242	1,001	N/A	108	**April 16,2025**	37.4646360	-121.9438850
778 (T*)	5451	80,000	1,567	N/A	7398	**April 16,2025**	37.4624430	-121.9429720

Fourth Quarter 2024

Table 1. LMR Instantaneous Surface and Component Emissions Monitoring Results

Newby Island Sanitary Landfill, Milpitas, California

Location (Surface)	Initial Monitoring Results (ppmv) December 18, 2024	First 10-Day Monitoring Results (ppmv) December 26, 2024	Second 10-Day Monitoring Results (ppmv) January 17, 2025 *Delayed due to rain/weather	30-Day Monitoring Results (ppmv) January 20, 2025	30-Day Monitoring Results (ppmv) January 27, 2025	120-Day Expansion Due Date	Latitude	Longitude
776 (BEC)	4810	10,700	18.3	N/A	19.1	N/A	37.4629770	-121.9428920
790 (BEC)	3288	15.4	N/A	51.4	N/A	N/A	37.4586830	-121.9405520
779	2522	17,000	16,000	N/A	2124	**April 16,2025**	37.4618780	-121.9426820
664 (HOV Temp)	2292	2,141	14,100	N/A	1931	**April 16,2025**	37.4619200	-121.9448700
716 (PS)	1419	86.8	N/A	63.3	N/A	N/A	37.4593050	-121.9447800
FC010	1377	776	1,071	N/A	984	**April 16,2025**	37.4637160	-121.9427910
499	1079	2,145	788	N/A	213	**April 16,2025**	37.4606590	-121.9408200
702 (P)(BEC)	572	20.6	N/A	15.5	N/A	N/A	37.4588000	-121.9408400

Fourth Quarter 2024

Table 1. LMR Instantaneous Surface and Component Emissions Monitoring Results

Newby Island Sanitary Landfill, Milpitas, California

Location (Surface)	Initial Monitoring Results (ppmv) December 19, 2024	First 10-Day Monitoring Results (ppmv) December 26 and 27, 2024	Second 10-Day Monitoring Results (ppmv) January 17, 2025 *Delayed due to rain/weather	30-Day Monitoring Results (ppmv) January 20, 2025	30-Day Monitoring Results (ppmv) January 27, 2025	120-Day Expansion Due Date	Latitude	Longitude
3W31 (HOV Temp)(R)(T*)	35,400	39.8	N/A	339	N/A	N/A	37.4591000	-121.9400700
HC259	2,595	43,000	29.4	N/A	3,094	**April 16, 2025**	37.4606430	-121.9439160
644(P)	2,292	498	N/A	9.1	N/A	N/A	37.4564700	-121.9426500
807 (T*)	1866	36.4	N/A	271	N/A	N/A	37.4589820	-121.9400330
HSR GRID27 RY	924	22.4	N/A	67.4	N/A	N/A	37.4627550	-121.9430230
HSR GRID26 RY	637	709	238	N/A	211	N/A	37.4629030	-121.9433090

Fourth Quarter 2024

Table 1. LMR Instantaneous Surface and Component Emissions Monitoring Results

Newby Island Sanitary Landfill, Milpitas, California

200-499 ppmv

Location (Surface)	Initial Monitoring Date	Initial Monitoring Results (ppmv)	Latitude	Longitude
569 (P)(BEC)	December 17, 2024	214	37.4597610	-121.9494520
HC244 (R)	December 17, 2024	344	37.4581170	-121.9441820
476 (T*)	December 18, 2024	349	37.4596680	-121.9407940
HSR GRID10 RY	December 19, 2024	285	37.4642460	-121.9424320
HSR GRID13 RY	December 19, 2024	248	37.4641650	-121.9428070
HSR GRID13 RY1	December 19, 2024	486	37.4641700	-121.9423510

Pressurized Pipe

Location	Initial Monitoring Results (ppmv) December 19, 2025	7-Day Monitoring Results (ppmv) December 23, 2024	Latitude	Latitude
Flare Station	3,519	4.50	37.455070	-121.950284

No other exceedances of the 500-ppm threshold were observed during the LMR/NSPS monitoring performed during the fourth quarter of 2024.

Attachment 4

Integrated Monitoring Results

Fourth Quarter 2024
Table 2. Integrated Surface Emissions Monitoring Results
Newby Island Landfill, Milpitas, California

Point Name	Record Date	FID Concentration (ppm)	Comments
NIL-001	12/19/2024	18.15	
NIL-002	12/19/2024	44.33	Initial Monitoring
NIL-002	12/26/2024	32.00	First 10-Day Recheck
NIL-002	1/17/2025	2.02	Second 10-Day Recheck
NIL-003	12/19/2024	70.56	Initial Monitoring
NIL-003	12/26/2024	46.67	First 10-Day Recheck
NIL-003	1/17/2025	12.62	Second 10-Day Recheck
NIL-004	12/19/2024	41.73	Initial Monitoring
NIL-004	12/26/2024	31.37	First 10-Day Recheck
NIL-004	1/17/2025	7.57	Second 10-Day Recheck
NIL-005	12/19/2024	29.38	Initial Monitoring
NIL-005	12/26/2024	35.73	First 10-Day Recheck
NIL-005	1/17/2025	8.11	Second 10-Day Recheck
NIL-006	12/19/2024	25.77	Initial Monitoring
NIL-006	12/26/2024	52.79	First 10-Day Recheck
NIL-006	1/28/2025	19.74	Second 10-Day Recheck
NIL-007	12/19/2024	18.25	
NIL-008	12/19/2024	33.33	Initial Monitoring
NIL-008	12/26/2024	23.56	First 10-Day Recheck
NIL-009	12/19/2024	14.45	
NIL-010	12/19/2024	28.70	Initial Monitoring
NIL-010	12/26/2024	56.29	First 10-Day Recheck
NIL-010	1/17/2025	24.88	Second 10-Day Recheck
NIL-011	12/19/2024	27.45	Initial Monitoring
NIL-011	12/26/2024	41.48	First 10-Day Recheck
NIL-011	1/17/2025	78.60	Second 10-Day Recheck Expansion Due April 16, 2025
NIL-012	12/19/2024	38.87	Initial Monitoring
NIL-012	12/26/2024	43.95	First 10-Day Recheck
NIL-012	1/17/2025	40.71	Second 10-Day Recheck Expansion Due April 16, 2025
NIL-013	12/19/2024	50.79	Initial Monitoring
NIL-013	12/26/2024	48.71	First 10-Day Recheck
NIL-013	1/17/2025	35.90	Second 10-Day Recheck Expansion Due April 16, 2025
NIL-014	12/19/2024	24.63	
NIL-015	12/26/2024	39.97	Initial Monitoring
NIL-015	1/17/2025	46.72	First 10-Day Recheck
NIL-015	1/20/2025	5.98	Second 10-Day Recheck
NIL-016	--	--	Active/Exempt Area
NIL-017	12/19/2024	50.07	Initial Monitoring
NIL-017	12/26/2024	22.44	First 10-Day Recheck
NIL-018	12/19/2024	42.37	Initial Monitoring
NIL-018	12/26/2024	40.88	First 10-Day Recheck

Fourth Quarter 2024
Table 2. Integrated Surface Emissions Monitoring Results
Newby Island Landfill, Milpitas, California

Point Name	Record Date	FID Concentration (ppm)	Comments
NIL-018	1/20/2025	13.60	Second 10-Day Recheck
NIL-019	12/26/2024	39.39	Initial Monitoring
NIL-019	12/27/2024	30.08	First 10-Day Recheck
NIL-019	1/17/2025	39.27	Second 10-Day Recheck Expansion Due April 16, 2025
NIL-020	--	--	Active/Exempt Area
NIL-021	12/23/2024	99.93	Initial Monitoring
NIL-021	12/26/2024	24.73	First 10-Day Recheck
NIL-022	12/19/2024	25.41	Initial Monitoring
NIL-022	12/26/2024	59.03	First 10-Day Recheck
NIL-022	1/17/2025	41.93	Second 10-Day Recheck Expansion Due April 16, 2025
NIL-023	12/19/2024	23.10	
NIL-024	--	--	Active/Exempt Area
NIL-025	12/23/2024	39.27	Initial Monitoring
NIL-025	1/17/2025	15.39	First 10-Day Recheck
NIL-026	12/19/2024	26.68	Initial Monitoring
NIL-026	12/26/2024	58.06	First 10-Day Recheck
NIL-026	1/17/2025	45.79	Second 10-Day Recheck Expansion Due April 16, 2025
NIL-027	12/19/2024	23.18	
NIL-028	--	--	Active/Exempt Area
NIL-029	12/23/2024	25.54	Initial Monitoring
NIL-029	1/17/2025	9.01	First 10-Day Recheck
NIL-030	12/19/2024	34.14	Initial Monitoring
NIL-030	12/26/2024	42.87	First 10-Day Recheck
NIL-030	1/17/2025	35.33	Second 10-Day Recheck Expansion Due April 16, 2025
NIL-032	--	--	Active/Exempt Area
NIL-033	--	--	Active/Exempt Area
NIL-034	--	--	Active/Exempt Area
NIL-035	12/26/2024	45.71	Initial Monitoring
NIL-035	1/17/2025	30.84	First 10-Day Recheck
NIL-035	1/20/2025	17.57	Second 10-Day Recheck
NIL-036	--	--	Active/Exempt Area
NIL-037	--	--	Active/Exempt Area
NIL-038	--	--	Active/Exempt Area
NIL-039	--	--	Active/Exempt Area
NIL-040	--	--	Active/Exempt Area
NIL-041	--	--	Active/Exempt Area
NIL-042	--	--	Active/Exempt Area
NIL-043	--	--	Active/Exempt Area
NIL-044	--	--	Active/Exempt Area
NIL-045	--	--	Active/Exempt Area
NIL-046	--	--	Active/Exempt Area

Fourth Quarter 2024
Table 2. Integrated Surface Emissions Monitoring Results
Newby Island Landfill, Milpitas, California

Point Name	Record Date	FID Concentration (ppm)	Comments
NIL-047	--	--	Active/Exempt Area
NIL-048	--	--	Active/Exempt Area
NIL-049	--	--	Active/Exempt Area
NIL-050	12/23/2024	240.80	Initial Monitoring
NIL-050	1/17/2025	89.95	First 10-Day Recheck
NIL-050	1/20/2025	30.59	Second 10-Day Recheck Expansion Due April 16, 2025
NIL-051	--	--	Active/Exempt Area
NIL-052	--	--	Active/Exempt Area
NIL-053	--	--	Active/Exempt Area
NIL-054	12/26/2024	3.02	
NIL-055	12/19/2024	10.12	
NIL-056	12/19/2024	9.94	
NIL-057	--	--	Active/Exempt Area
NIL-058	12/23/2024	129.79	Initial Monitoring
NIL-058	1/17/2025	70.30	First 10-Day Recheck
NIL-058	1/20/2025	45.52	Second 10-Day Recheck Expansion Due April 16, 2025
NIL-059	--	--	Active/Exempt Area
NIL-060	--	--	Active/Exempt Area
NIL-061	12/26/2024	15.78	
NIL-062	12/18/2024	12.82	
NIL-063	--	--	Active/Exempt Area
NIL-064	--	--	Active/Exempt Area
NIL-065	--	--	Active/Exempt Area
NIL-066	12/19/2024	23.36	
NIL-067	--	--	Active/Exempt Area
NIL-068	12/23/2024	144.30	Initial Monitoring
NIL-068	1/17/2025	43.52	First 10-Day Recheck
NIL-068	1/20/2025	37.10	Second 10-Day Recheck Expansion Due April 16, 2025
NIL-069	--	--	Active/Exempt Area
NIL-070	--	--	Active/Exempt Area
NIL-071	--	--	Active/Exempt Area
NIL-072	--	--	Active/Exempt Area
NIL-073	12/26/2024	2.69	
NIL-074	--	--	Active/Exempt Area
NIL-075	--	--	Active/Exempt Area
NIL-076	--	--	Active/Exempt Area
NIL-077	--	--	Active/Exempt Area
NIL-078	--	--	Active/Exempt Area
NIL-079	12/23/2024	127.05	Initial Monitoring
NIL-079	1/17/2025	22.11	First 10-Day Recheck
NIL-080	--	--	Active/Exempt Area

Fourth Quarter 2024
Table 2. Integrated Surface Emissions Monitoring Results
Newby Island Landfill, Milpitas, California

Point Name	Record Date	FID Concentration (ppm)	Comments
NIL-081	--	--	Active/Exempt Area
NIL-082	--	--	Active/Exempt Area
NIL-083	12/18/2024	8.51	
NIL-084	--	--	Active/Exempt Area
NIL-085	--	--	Active/Exempt Area
NIL-086	--	--	Active/Exempt Area
NIL-087	--	--	Active/Exempt Area
NIL-088	--	--	Active/Exempt Area
NIL-089	--	--	Active/Exempt Area
NIL-090	--	--	Active/Exempt Area
NIL-091	--	--	Active/Exempt Area
NIL-092	--	--	Active/Exempt Area
NIL-093	--	--	Active/Exempt Area
NIL-094	--	--	Active/Exempt Area
NIL-095	12/19/2024	25.92	Initial Monitoring
NIL-095	12/26/2024	13.80	First 10-Day Recheck
NIL-096	--	--	Active/Exempt Area
NIL-097	--	--	Active/Exempt Area
NIL-098	--	--	Active/Exempt Area
NIL-099	--	--	Active/Exempt Area
NIL-100	--	--	Active/Exempt Area
NIL-101	--	--	Active/Exempt Area
NIL-102	--	--	Active/Exempt Area
NIL-103	--	--	Active/Exempt Area
NIL-104	12/19/2024	19.63	
NIL-105	--	--	Active/Exempt Area
NIL-106	--	--	Active/Exempt Area
NIL-107	--	--	Active/Exempt Area
NIL-108	--	--	Active/Exempt Area
NIL-109	--	--	Active/Exempt Area
NIL-110	--	--	Active/Exempt Area
NIL-111	--	--	Active/Exempt Area
NIL-112	--	--	Active/Exempt Area
NIL-113	12/26/2024	2.66	
NIL-114	12/26/2024	2.63	
NIL-115	12/19/2024	40.22	Initial Monitoring
NIL-115	12/26/2024	11.02	First 10-Day Recheck
NIL-116	--	--	Active/Exempt Area
NIL-117	--	--	Active/Exempt Area
NIL-118	--	--	Active/Exempt Area
NIL-119	--	--	Active/Exempt Area
NIL-120	--	--	Active/Exempt Area
NIL-121	--	--	Active/Exempt Area

Fourth Quarter 2024
Table 2. Integrated Surface Emissions Monitoring Results
Newby Island Landfill, Milpitas, California

Point Name	Record Date	FID Concentration (ppm)	Comments
NIL-122	--	--	Active/Exempt Area
NIL-123	12/18/2024	10.43	
NIL-124	12/18/2024	18.36	
NIL-125	12/26/2024	2.65	
NIL-126	--	--	Active/Exempt Area
NIL-127	--	--	Active/Exempt Area
NIL-128	--	--	Active/Exempt Area
NIL-129	--	--	Active/Exempt Area
NIL-130	--	--	Active/Exempt Area
NIL-131	--	--	Active/Exempt Area
NIL-132	--	--	Active/Exempt Area
NIL-133	--	--	Active/Exempt Area
NIL-134	12/18/2024	12.39	
NIL-135	12/18/2024	14.19	
NIL-136	12/26/2024	3.10	
NIL-137	--	--	Active/Exempt Area
NIL-138	--	--	Active/Exempt Area
NIL-139	--	--	Active/Exempt Area
NIL-140	--	--	Active/Exempt Area
NIL-141	--	--	Active/Exempt Area
NIL-142	12/26/2024	54.94	Initial Monitoring
NIL-142	1/17/2025	91.03	First 10-Day Recheck
NIL-142	1/28/2025	53.95	Second 10-Day Recheck Expansion Due April 16, 2025
NIL-143	--	--	Active/Exempt Area
NIL-144	12/18/2024	11.41	
NIL-145	12/26/2024	3.32	
NIL-146	12/26/2024	3.21	
NIL-147	--	--	Active/Exempt Area
NIL-148	--	--	Active/Exempt Area
NIL-149	--	--	Active/Exempt Area
NIL-150	--	--	Active/Exempt Area
NIL-151	--	--	Active/Exempt Area
NIL-152	--	--	Active/Exempt Area
NIL-153	--	--	Active/Exempt Area
NIL-154	--	--	Active/Exempt Area
NIL-155	12/18/2024	15.89	
NIL-156	12/18/2024	12.74	
NIL-157	12/18/2024	1.20	
NIL-158	--	--	Active/Exempt Area
NIL-159	--	--	Active/Exempt Area
NIL-160	--	--	Active/Exempt Area
NIL-161	--	--	Active/Exempt Area

Fourth Quarter 2024
Table 2. Integrated Surface Emissions Monitoring Results
Newby Island Landfill, Milpitas, California

Point Name	Record Date	FID Concentration (ppm)	Comments
NIL-162	--	--	Active/Exempt Area
NIL-163	--	--	Active/Exempt Area
NIL-164	--	--	Active/Exempt Area
NIL-165	12/18/2024	9.68	
NIL-166	12/18/2024	8.71	
NIL-167	12/18/2024	1.32	
NIL-168	12/26/2024	4.17	
NIL-169	12/19/2024	11.36	
NIL-170	--	--	Active/Exempt Area
NIL-171	--	--	Active/Exempt Area
NIL-172	--	--	Active/Exempt Area
NIL-173	--	--	Active/Exempt Area
NIL-174	--	--	Active/Exempt Area
NIL-175	--	--	Active/Exempt Area
NIL-176	12/18/2024	12.98	
NIL-177	12/26/2024	3.67	
NIL-178	12/18/2024	8.03	
NIL-179	12/19/2024	7.70	
NIL-180	--	--	Active/Exempt Area
NIL-181	--	--	Active/Exempt Area
NIL-182	--	--	Active/Exempt Area
NIL-183	--	--	Active/Exempt Area
NIL-184	--	--	Active/Exempt Area
NIL-185	--	--	Active/Exempt Area
NIL-186	12/18/2024	11.52	
NIL-187	12/26/2024	3.69	
NIL-188	12/18/2024	8.31	
NIL-189	12/19/2024	7.35	
NIL-190	--	--	Active/Exempt Area
NIL-191	--	--	Active/Exempt Area
NIL-192	--	--	Active/Exempt Area
NIL-193	--	--	Active/Exempt Area
NIL-194	--	--	Active/Exempt Area
NIL-195	--	--	Active/Exempt Area
NIL-196	12/18/2024	19.17	
NIL-197	12/18/2024	7.08	
NIL-198	12/18/2024	3.54	
NIL-199	12/19/2024	7.79	
NIL-200	12/19/2024	9.48	
NIL-201	12/19/2024	15.34	
NIL-202	--	--	Active/Exempt Area
NIL-203	--	--	Active/Exempt Area
NIL-204	--	--	Active/Exempt Area

Fourth Quarter 2024
Table 2. Integrated Surface Emissions Monitoring Results
Newby Island Landfill, Milpitas, California

Point Name	Record Date	FID Concentration (ppm)	Comments
NIL-205	--	--	Active/Exempt Area
NIL-206	--	--	Active/Exempt Area
NIL-207	12/18/2024	23.77	
NIL-208	--	--	Active/Exempt Area
NIL-209	12/18/2024	8.47	
NIL-210	12/19/2024	7.51	
NIL-211	--	--	Active/Exempt Area
NIL-212	--	--	Active/Exempt Area
NIL-213	--	--	Active/Exempt Area
NIL-214	--	--	Active/Exempt Area
NIL-215	--	--	Active/Exempt Area
NIL-216	12/18/2024	20.91	
NIL-217	--	--	Active/Exempt Area
NIL-218	12/18/2024	5.64	
NIL-219	12/19/2024	8.40	
NIL-220	--	--	Active/Exempt Area
NIL-221	--	--	Active/Exempt Area
NIL-222	--	--	Active/Exempt Area
NIL-223	--	--	Active/Exempt Area
NIL-224	--	--	Active/Exempt Area
NIL-225	12/18/2024	6.58	
NIL-226	12/26/2024	3.74	
NIL-227	12/18/2024	7.94	
NIL-228	12/19/2024	8.84	
NIL-229	--	--	Active/Exempt Area
NIL-230	--	--	Active/Exempt Area
NIL-231	--	--	Active/Exempt Area
NIL-232	--	--	Active/Exempt Area
NIL-233	--	--	Active/Exempt Area
NIL-234	--	--	Active/Exempt Area
NIL-235	12/18/2024	6.74	
NIL-236	12/18/2024	2.62	
NIL-237	12/18/2024	9.48	
NIL-238	12/19/2024	9.01	
NIL-239	12/26/2024	5.15	
NIL-240	--	--	Active/Exempt Area
NIL-241	--	--	Active/Exempt Area
NIL-242	12/18/2024	10.35	
NIL-243	12/18/2024	6.73	
NIL-244	12/18/2024	11.04	
NIL-245	12/26/2024	7.53	
NIL-246	--	--	Active/Exempt Area
NIL-247	--	--	Active/Exempt Area

Fourth Quarter 2024
Table 2. Integrated Surface Emissions Monitoring Results
Newby Island Landfill, Milpitas, California

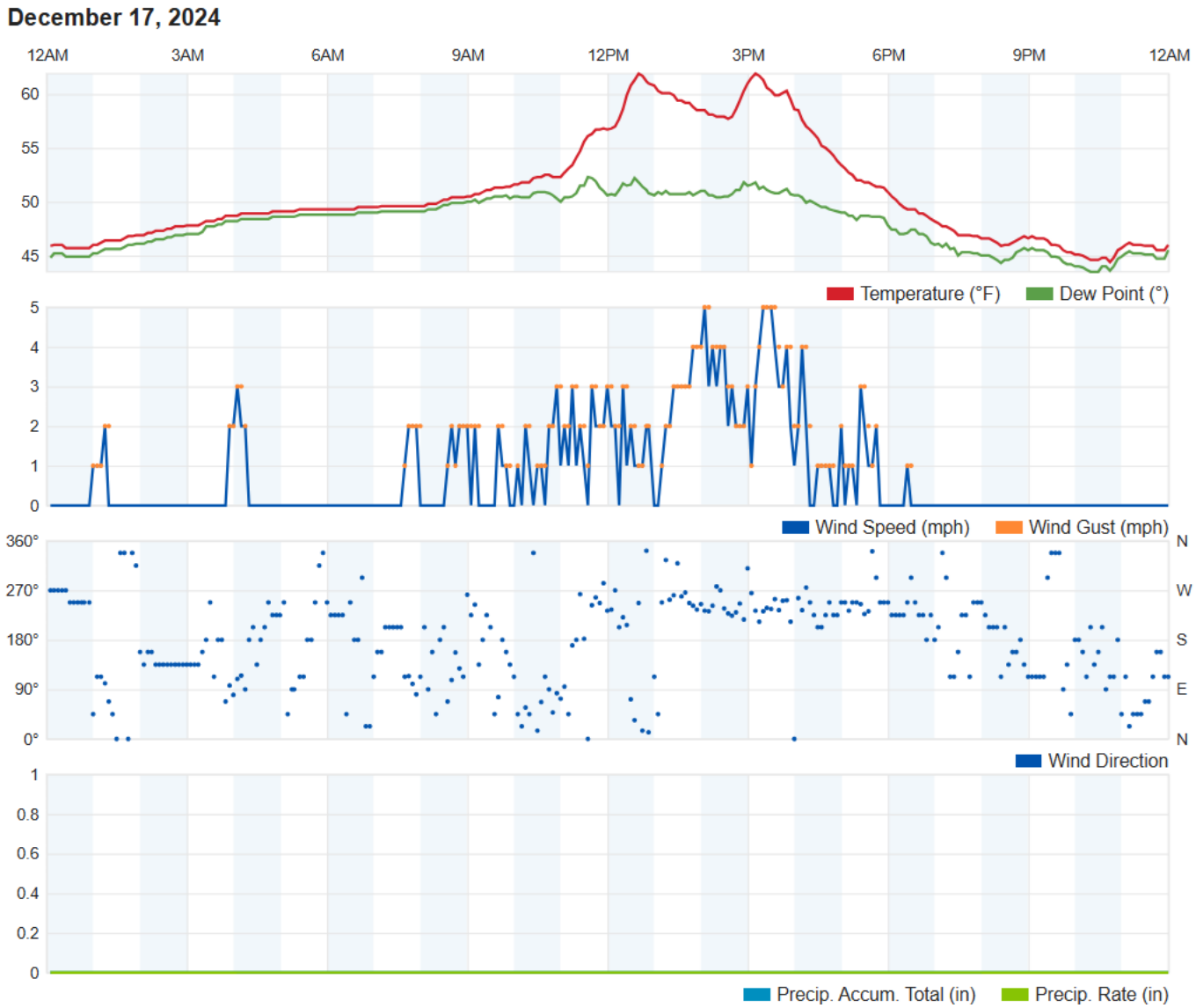
Point Name	Record Date	FID Concentration (ppm)	Comments
NIL-248	--	--	Active/Exempt Area
NIL-249	12/18/2024	8.39	
NIL-250	12/26/2024	8.30	
NIL-251	12/26/2024	16.64	
NIL-252	12/26/2024	13.67	
NIL-253	12/26/2024	17.31	
NIL-254	12/26/2024	13.04	
NIL-255	--	--	Active/Exempt Area
NIL-256	12/18/2024	7.04	
NIL-257	12/18/2024	8.47	
NIL-258	--	--	Active/Exempt Area
NIL-259	12/18/2024	4.95	
NIL-260	--	--	Active/Exempt Area
NIL-261	--	--	Active/Exempt Area
NIL-262	12/18/2024	1.89	
NIL-263	--	--	Active/Exempt Area
NIL-264	--	--	Active/Exempt Area
NIL-265	--	--	Active/Exempt Area
NIL-266	--	--	Active/Exempt Area
NIL-267	--	--	Active/Exempt Area
NIL-268	--	--	Active/Exempt Area
NIL-269	--	--	Active/Exempt Area
NIL-270	--	--	Active/Exempt Area
NIL-271	--	--	Active/Exempt Area
NIL-272	--	--	Active/Exempt Area
NIL-273	--	--	Active/Exempt Area
NIL-274	--	--	Active/Exempt Area
NIL-275	--	--	Active/Exempt Area
NIL-276	--	--	Active/Exempt Area
NIL-277	--	--	Active/Exempt Area

Attachment 5

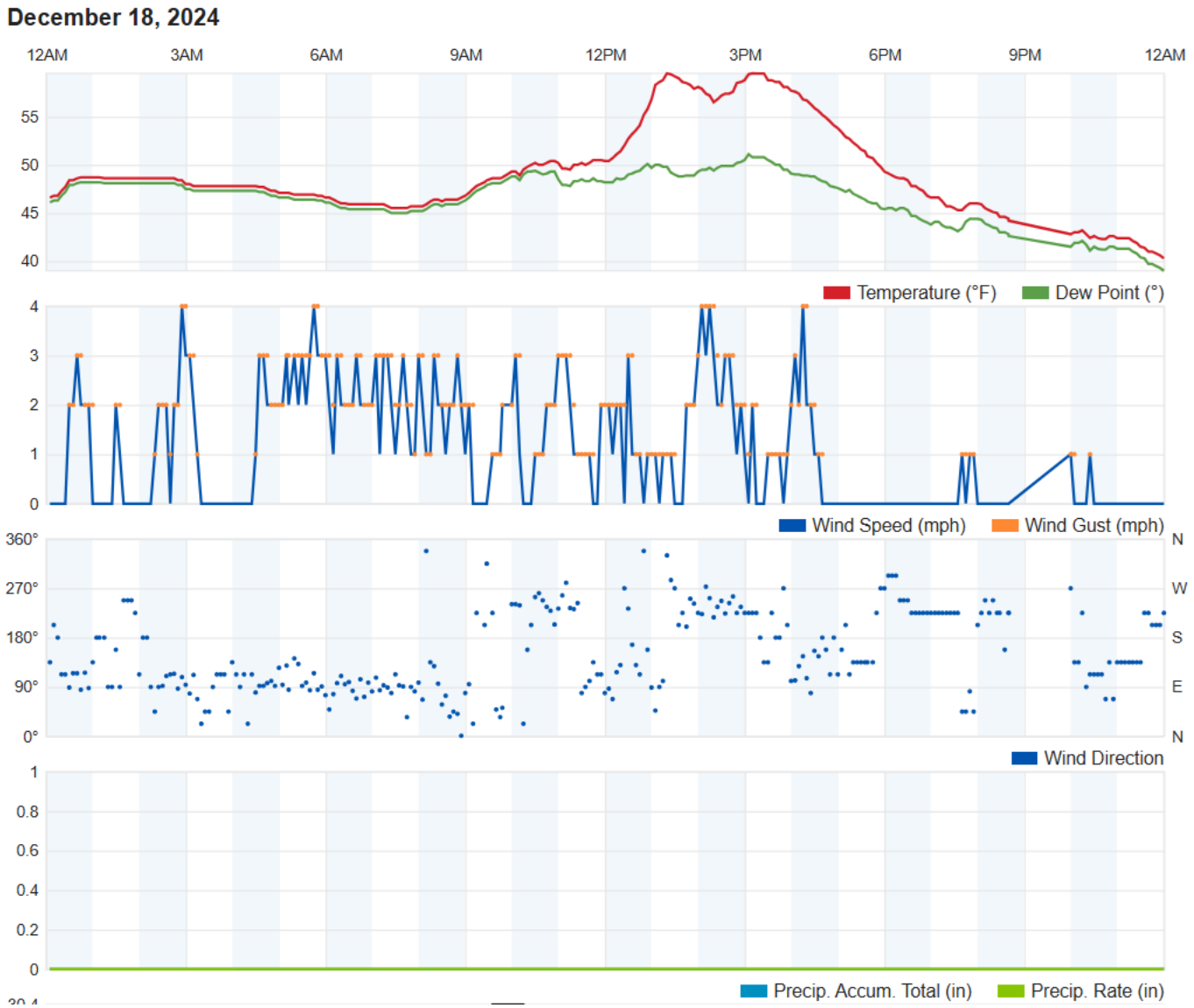
Calibration Logs

Attachment 6

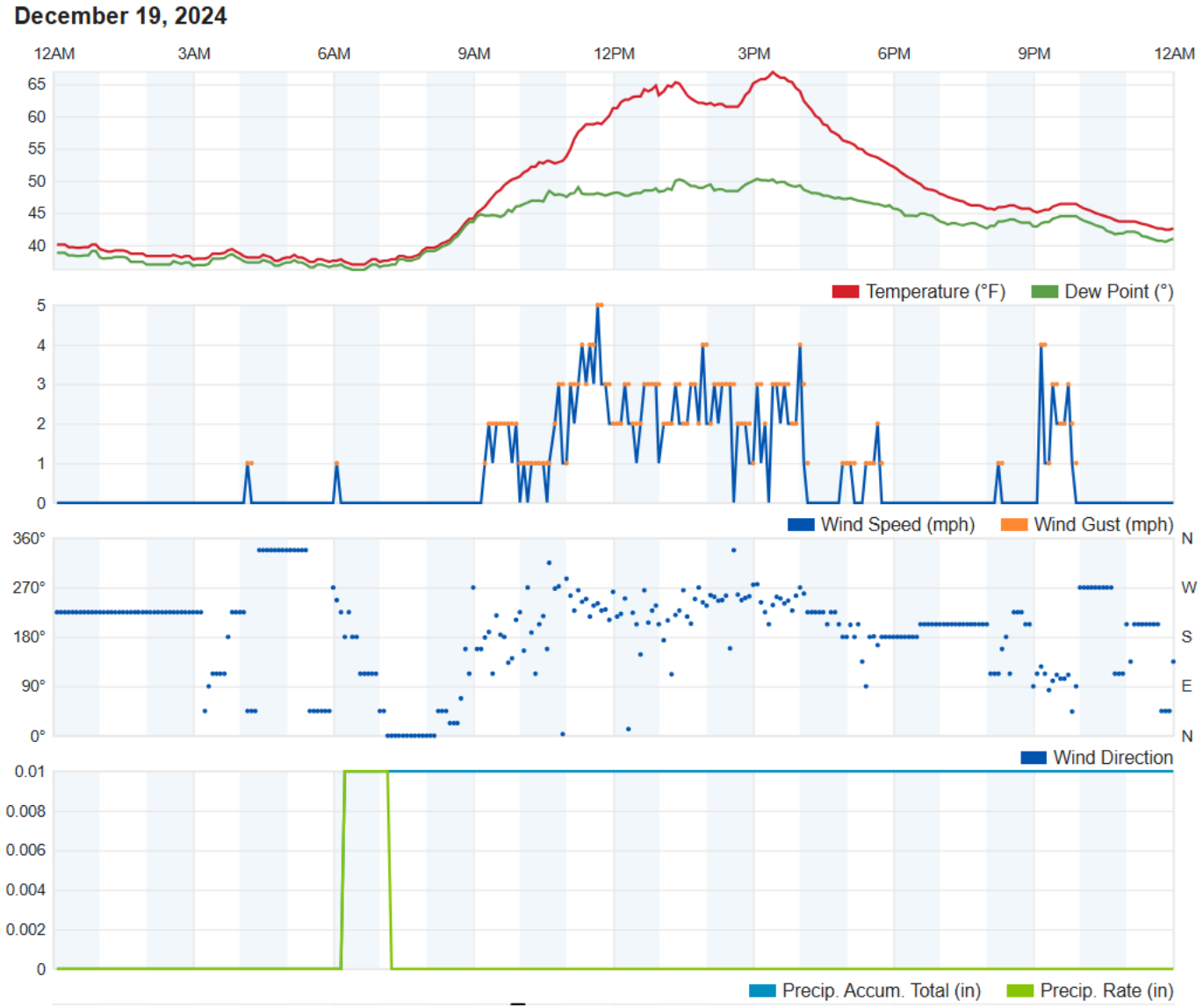
Weather Data



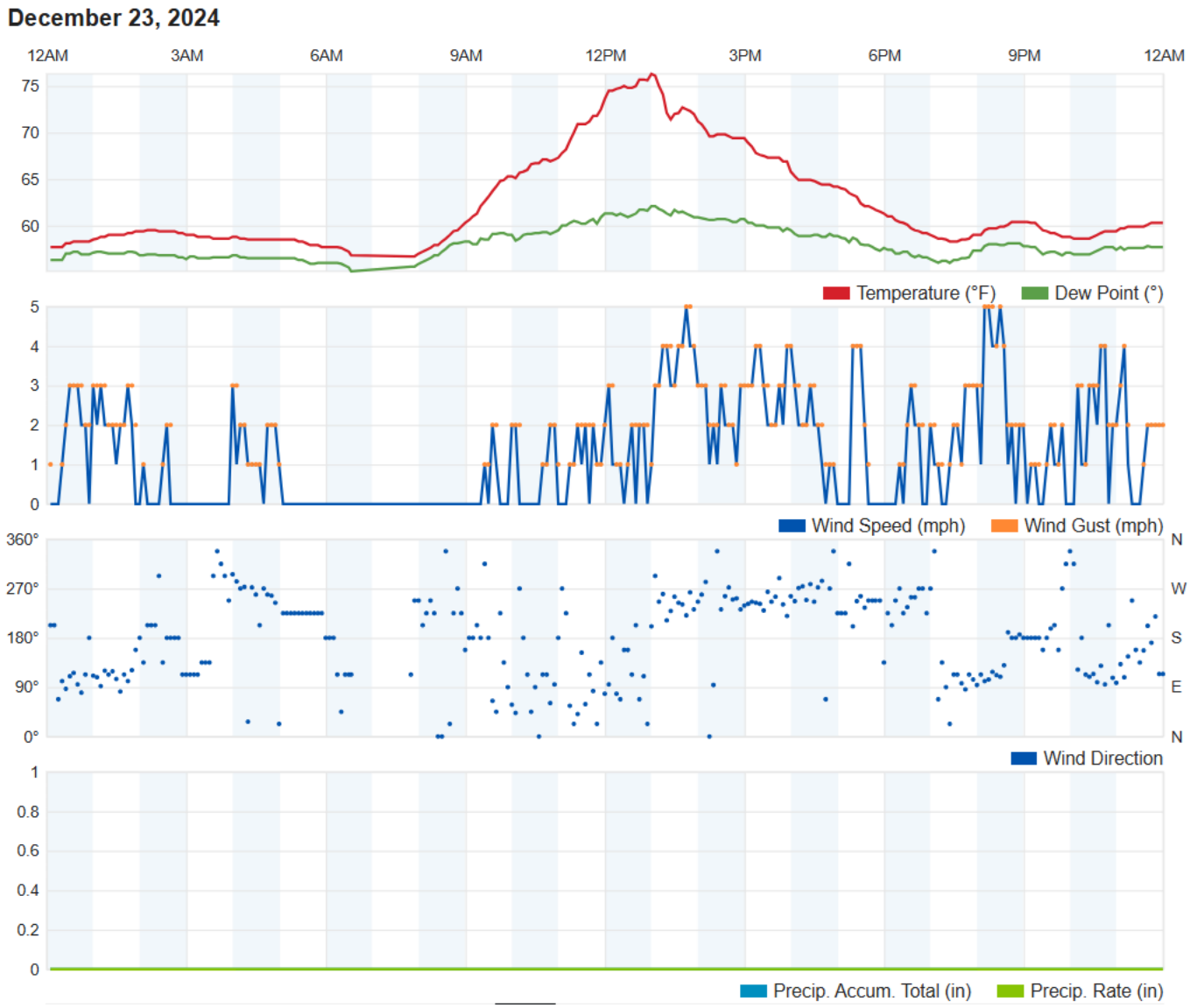
Fourth Quarter 2024
LMR Surface Emissions Monitoring Weather Data
December 17, 2024
Newby Island Landfill, Milpitas, California



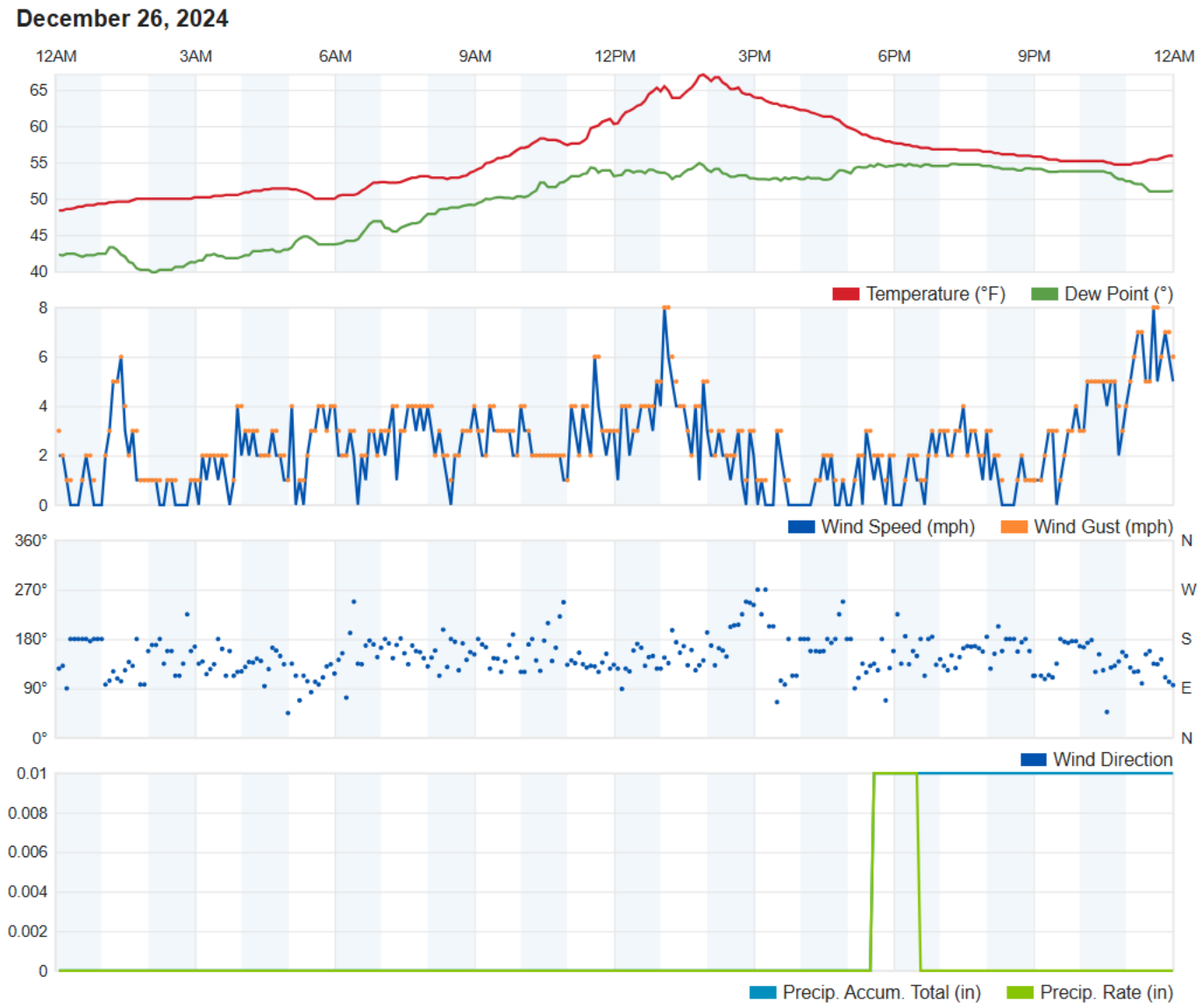
Fourth Quarter 2024
LMR Surface Emissions Monitoring Weather Data
December 18, 2024
Newby Island Landfill, Milpitas, California



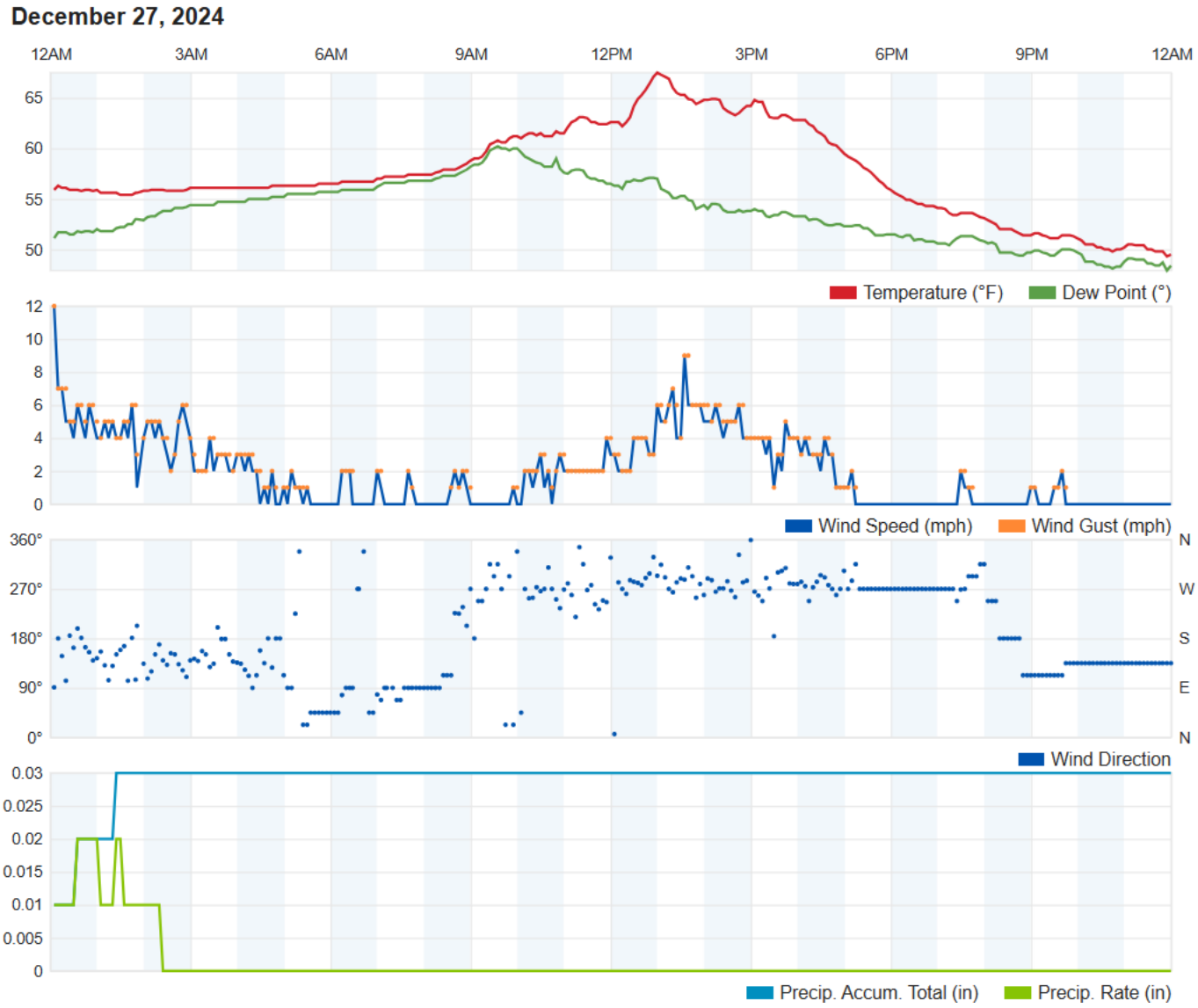
Fourth Quarter 2024
LMR Surface Emissions Monitoring Weather Data
December 19, 2024
Newby Island Landfill, Milpitas, California



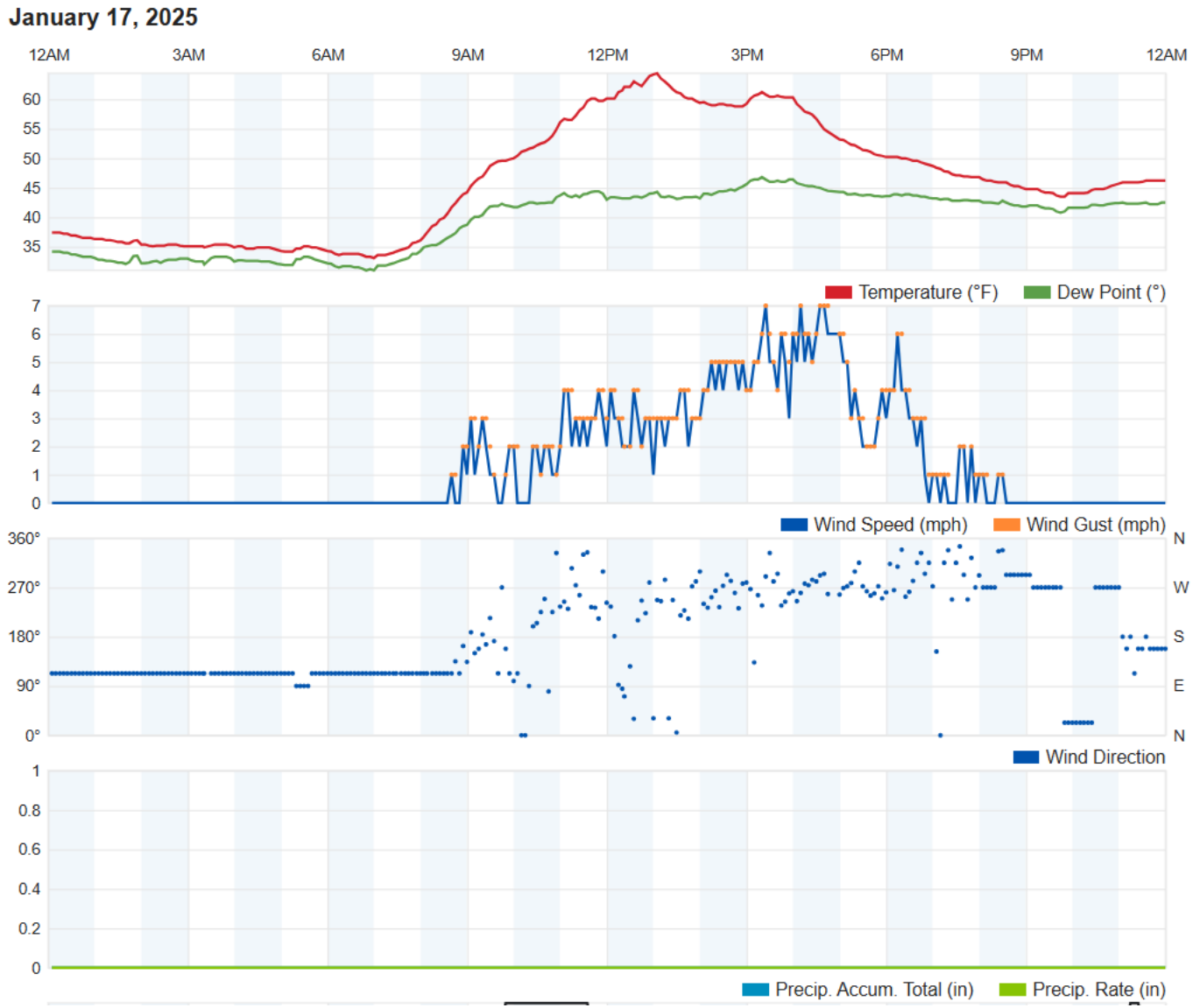
Fourth Quarter 2024
LMR Surface Emissions Monitoring Weather Data
December 23, 2024
Newby Island Landfill, Milpitas, California



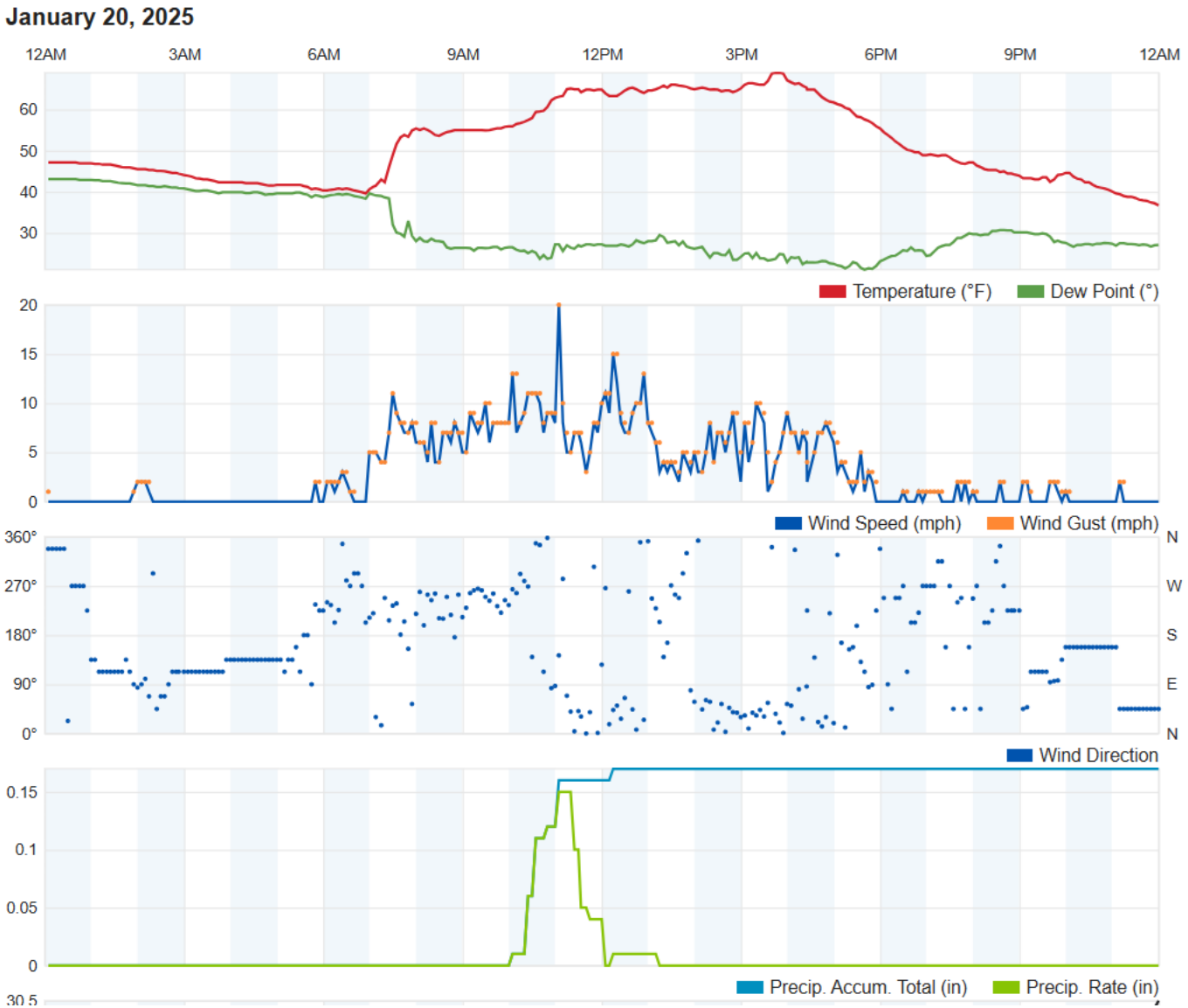
Fourth Quarter 2024
LMR Surface Emissions Monitoring Weather Data
December 26, 2024
Newby Island Landfill, Milpitas, California



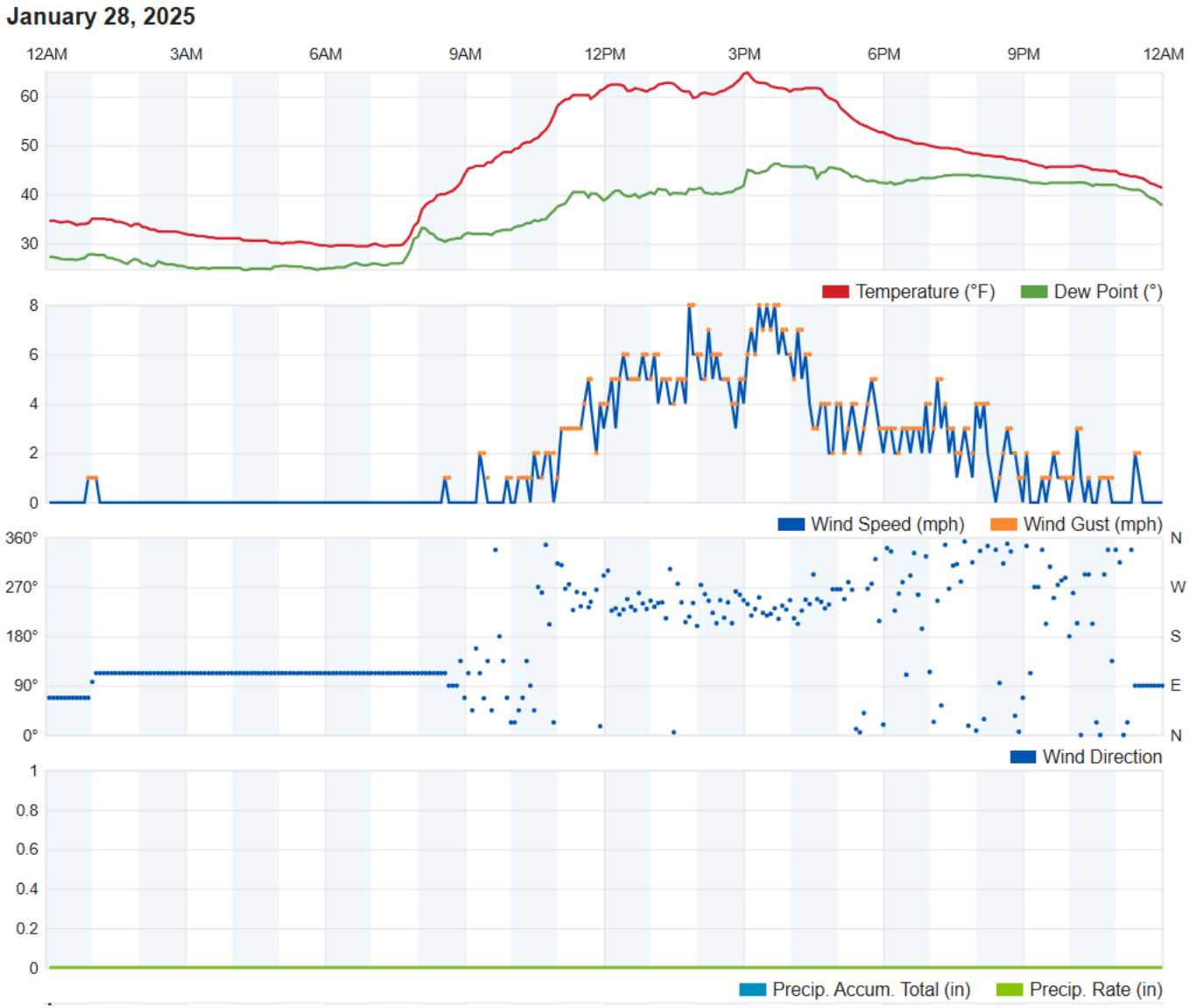
Fourth Quarter 2024
LMR Surface Emissions Monitoring Weather Data
December 27, 2024
Newby Island Landfill, Milpitas, California



Fourth Quarter 2024
LMR Surface Emissions Monitoring Weather Data
January 17, 2025
Newby Island Landfill, Milpitas, California



Fourth Quarter 2024
LMR Surface Emissions Monitoring Weather Data
January 20, 2025
Newby Island Landfill, Milpitas, California



Fourth Quarter 2024
LMR Surface Emissions Monitoring Weather Data
January 28, 2025
Newby Island Landfill, Milpitas, California

Appendix D – Source Test Results

International Disposal Corporation of California

BAAQMD Plant No: 9013

Compliance Emissions Test Report #24056

Flare (A-2) FL-150
Flare (A-3) FL-100

Located at:
Newby Island Landfill
1601 W. Dixon Landing Road
Milpitas, CA 95035

Prepared for:
Republic Services Newby Island Landfill
1601 W. Dixon Landing Road
Milpitas, CA 95035
Attn: Rachelle Huber
RHuber2@republicservices.com

For Submittal to:
The Bay Area Air Quality Management District
375 Beale Street, Suite 600
San Francisco, CA 94105
Attn: Marco Hernandez and Gloria Espena
mhernandez@baaqmd.gov / gespena@baaaqmd.gov
sourcetest@baaqmd.gov

Testing Performed on:
February 7, 2024

Final Report Submitted on:
March 20, 2024

Performed and Reported by:
Blue Sky Environmental, Inc.
2273 Lobert Street
Castro Valley, CA 94546
bluesky@blueskyenvironmental.com
(510) 525 1261 office / (810) 923 3181 cell

Blue Sky Environmental, Inc.
2273 Lobert Street
Castro Valley, CA 94546
Office (510) 525 1261
Cell (810) 923 3181
bluesky@blueskyenvironmental.com

March 20, 2024

Newby Island Landfill
1601 W. Dixon Landing Road
Milpitas, CA 95035

Attn.: Rachelle Huber

Subject: Compliance emission test report for Flares A-2 and A-3 located at Newby Island Landfill in Milpitas, California, to demonstrate compliance with condition 10423 of the Bay Area Air Quality Management District (BAAQMD) permit to operate for Facility #9013.

Flare A-2 – 75 MMBtu/hr John Zink landfill gas flare

Flare A-3 – 152 MMBtu/hr John Zink enclosed landfill gas flare with ultra-low emissions

Test Date: Sampling was conducted on February 8, 2023

Sampling Location: Sampling was conducted at the exhaust stack of each flare through ports that were accessible using a 40-foot boom lift. Sampling ports were available that met EPA Method 1 minimum criteria of 2 stack diameters downstream from the nearest disturbance and 0.5 stack diameters upstream from the nearest disturbance or exhaust.

Blue Sky Environmental conducted an eight-point traverse of each stack at each port to check for the presence of cyclonic flow. Flare A-2, with a 92-inch ID exhaust stack, had only one suitable test port; therefore, this port was traversed twice. Flare A-3, with a 144-inch ID exhaust stack and two sampling ports was traversed at each port, 90° apart. Stratification in both stacks was greater than 10%; therefore, subsequent CEM sampling was conducted using the same traverse points.

Sampling Personnel: Sampling was performed by Jeramie Richardson, Jamie Rios and Lesly Wolf of Blue Sky Environmental, Inc.

Observing Personnel: BAAQMD was notified of the scheduled testing in a source test protocol submitted by Rachelle Huber on January 29, 2024 (NST 9038 and NST 9039). There were no agency observers from BAAQMD present during the test program. Johnathan Heitchler of SCS Engineers was on-site to operate the flares and provide operating records of fuel flow and combustion temperatures.

Process Description: Newby Island Landfill is a multi-material landfill with gas collection system operated by International Disposal Corp of California. The system is abated by two John Zink landfill gas flares (A-2 and A-3). Flare A-2 is maintained at a setpoint of 1,400 °F. Flare A-3 is maintained at a setpoint of 1,500 °F.

Test Program: Testing was conducted to demonstrate compliance of Flares A-2 and A-3 with nitrogen oxide (NO_X) and carbon monoxide (CO) emission limits stated in condition 10423 of the BAAQMD permit to operate for Plant #9013.

Three consecutive 30-minute tests were performed for NO_X, CO, carbon dioxide (CO_2) and oxygen (O_2) at each flare exhaust stack. The sampling system was checked for leaks before the start of the testing, by plugging the sample probe and observing the sample rotameter flow drop to zero. The temperatures of the heated sample line between the probe and sample conditioner/condenser and the condenser exhaust temperatures were maintained within limits during each test run. Instrument linearity and system bias were checked. The system response time for each analyzer was recorded. Analyzer external calibrations were performed before and after each run using EPA protocol certified gas standards. Calibration gases were introduced to the sample manifold at the same flow rate as the sample. Any drift or bias was corrected using equation 100-3 from CARB 100.

A NO_X analyzer converter efficiency check was performed before the first test run and achieved an efficiency greater than 90%.

Concurrent with the exhaust sampling, Blue Sky Environmental collected a total of six LFG samples (three samples from each flare) in 6-L Silco SUMMA canisters for off-site analysis by Atmospheric Analysis & Consulting, Inc., located in Ventura, California. The samples were analyzed for HHV, F-factor, fixed gases, methane, non-methane organic compounds (NMOC) by EPA Method 25C and ASTM D-1945, and total reduced sulfurs (TRS) by ASTM D-5504.

One of the integrated landfill gas samples collected from each flare was also analyzed by EPA Method TO-15 to determine the VOC Species Landfill Gas Characterization.

Sampling and Analysis Methods: The following U.S. Environmental Protection Agency (EPA) and ASTM International sampling and analytical methods were used:

EPA Method 1	Sample Travers Point Determination
EPA Method 3A	O_2, CO_2 Emissions
EPA Method 7E	NO_X Emissions
EPA Method 10	CO Emissions
EPA Method 25A	THC/CH_4/NMHC Emissions
EPA Method 4, part 16.4	Stack Moisture
EPA Method 19	Stack Gas Flowrate
EPA Method 25C	Analysis of landfill gas for TNMHC (NMOC)
ASTM D-1945/3588	Fuel Analysis for BTU and F-Factors & Fixed Gases
ASTM D-5504	Total Reduced Sulfur Compounds (TRS) in Fuel
EPA Method TO-15	Volatile Organic Compounds (VOC) in Fuel

The sampling and analysis methods are summarized below:

EPA Method 1 – Sample and Velocity Traverses for Stationary Sources
This method is used to determine the duct or stack area and appropriate traverse points that represent equal areas of the duct for sampling and velocity measurements.

EPA Method 3A – Determination of Oxygen and Carbon Dioxide Concentrations in Emissions from Stationary Sources (Instrumental Analyzer Procedure)
This method is used to measure oxygen and carbon dioxide in stationary source emissions using a continuous instrumental analyzer to determine the molecular weight of the stack gas. A continuous representative gas sample is extracted from the sampling point and conditioned to remove water and particulate material. A small portion of the sample is passed through a fuel cell type paramagnetic

oxygen analyzer which measures the electrical current generated by the oxidation reaction at the gas/fuel cell interface. Carbon dioxide is determined by passing the sample through a non-dispersive infrared analyzer (NDIR) tuned to a frequency at which carbon dioxide absorbs infrared radiation.

EPA Method 7E – Determination of Nitrogen Oxides Emissions from Stationary Sources (Instrumental Analyzer Procedure)

This method is used to measure nitrogen oxides in stationary source emissions using a continuous instrumental analyzer. A continuous representative gas sample is extracted from the sampling point and conditioned to remove water and particulate material. Nitric oxide is determined by passing the sample through a chemiluminescent analyzer. The chemiluminescent process is based on the light given off when nitric oxide and ozone react. Nitrogen dioxide (NO_2) concentrations are determined by passing the sample through a catalyst which reduces the NO_2 to NO. The total oxides of nitrogen concentration (NO_2 + NO) is then determined by chemiluminescence.

Section 16.2.2 of the method is used to determine the NO_X analyzer NO_2 to NO conversion efficiency.

EPA Method 10 – Determination of Carbon Monoxide Emissions from Stationary Sources

This method is used to measure carbon monoxide from integrated or continuous gas samples extracted from a sampling point. A continuous representative gas sample is extracted from the sampling point and conditioned to remove water and particulate material. Carbon monoxide is determined by passing the sample through a non-dispersive infrared analyzer (NDIR) tuned to a frequency at which carbon monoxide absorbs infrared radiation.

EPA Methods 3A, 7E and 10 are all continuous monitoring techniques using instrumental analyzers. Sampling is performed by extracting exhaust flue gas from the stack, conditioning the sample, and analyzing it by continuous monitoring gas analyzers in a continuing emissions monitoring (CEM) test van. The sampling system consists of a stainless steel sample probe, Teflon sample line, glass-fiber particulate filter, and glass moisture-knockout condensers in ice, followed by thermoelectric coolers (optional), Teflon sample transfer tubing, a diaphragm pump, and a stainless steel/Teflon manifold and flow control/delivery system. A constant sample and calibration gas supply pressure of 5 psi is provided to each analyzer to avoid pressure variable response differences. The entire sampling system is leak checked prior to and at the end of the sampling program.

The sampling and analytical system is checked for linearity with zero, mid (40-60%) and high span (80-100%) calibrations and is checked for system bias at the beginning and end of each run. System bias is determined by introducing calibration gas to the probe and pulling it through the entire sampling system. Individual test run calibrations use the calibration gas that most closely matches the stack gas effluent. All calibrations during testing are performed externally to incorporate any system bias that may exist. Sampling system bias, zero and calibration drift values are determined for each test. EPA Methods 3A, 6C, 7E and 10 all defer to EPA Method 7E for the calculations of effluent concentration, span, calibration gas, analyzer calibration error (linearity), sampling system bias, zero drift, calibration drift and response time.

All calibration gases are EPA Protocol #1. The analyzer data recording system consists of a Honeywell DPR3000 strip chart recorder supported by a Data Acquisition System (DAS).

EPA Method 25A – Determination of Total Gaseous Organic Concentration using a Flame Ionization Analyzer

This method is used to measure total hydrocarbons, methane, and non-methane hydrocarbons in stationary source emissions using a gas chromatograph with a flame ionization detector (GC/FID).

Heated Teflon sample gas transfer lines are used to provide a continuous sample to the heated GC/FID hydrocarbon analyzer. Heated lines are used to avoid moisture or hydrocarbon condensation.

The sampling and analytical system is checked for linearity with zero, low (25-35%), mid (45-55%), and high (80-90%) span calibrations. All calibrations during testing are performed externally to incorporate any system bias that may exist. Sampling system bias, zero and calibration drift values are determined for each test. All data is corrected according to the method.

EPA Method 4 – Determination of Moisture Content in Stack Gas

This method is used to determine the moisture content of stack gas. The sample is extracted and condensed in Greenburg-Smith impingers immersed in an ice bath and in a final impinger silica gel trap. The moisture is condensed in a solution of de-ionized water, or solutions of another type of sampling train if the moisture is being determined as part of another sampling method, such as EPA Method 5, SCAQMD Method 201.7 or BAAQMD ST-32. The moisture gain in the impinger solutions and silica gel is determined volumetrically and gravimetrically respectively.

QA/QC procedures require that a minimum of 21 cubic feet of sample is pulled using a leak tight pump. The sample volume is measured with a calibrated dry gas meter. The impingers are immersed in an ice bath to maintain a gas outlet temperature of less than 68°F. Pre-test leak checks are performed for each run using a minimum 15 inches of mercury vacuum. Post-test leak checks are performed at the highest sample vacuum or greater. The leak test is acceptable if the leak rate is less than 0.02 cubic feet per minute or 4% of the average sampling rate, whichever is less. If the final leak check exceeds the criteria, either the volume is corrected based on the leak rate or the run is voided and repeated.

EPA Method 19 – Determination of Sulfur Dioxide Removal Efficiency and Particulate Matter, Sulfur Dioxide, and Nitrogen Oxide Emission Rates

This method is used to determine stack gas volumetric flow rates using oxygen-based F-factors. F-factors are ratios of combustion gas volumes to heat inputs. The heating value of the fuel in Btu per cubic foot is determined from analysis of fuel gas samples using ASTM D-1946/1945 gas chromatography analytical procedures. The total cubic feet per hour of fuel multiplied times the Btu/cf provides million Btu per hour (MMBtu) heat input. The heat input in MMBtu/hr is multiplied by the F-factor (DSCF/MMBtu) and adjusted for the measured oxygen content of the source to determine volumetric flow rate. The flow rates are used to determine emission rates.

EPA Method 25C – Determination of Nonmethane Organic Compounds (NMOC) in Landfill Gas

This method is used to sample and measure NMOC in landfill gases. Gases are collected in a pre-evacuated 6-Liter SUMMA canister with pre-set flow controller set to integrate over the desired test duration. The SUMMA® passivated canisters allow holding times up to 14 days. The sample gas is drawn by the canister vacuum through a micro-filter, pre-set orifice flow controller and on/off valve into the canister. The canister vacuum is monitored with a vacuum gauge to verify sample collection. The flow controller consists of capillary orifice tubing designed to sample for a pre-set duration of 0.5 hrs. The sample is injected into a GC column where the methane and CO_2 are flushed through and removed then the NMOC (ROC) fraction is oxidized to form CO_2 then reduced to methane and analyzed.

ASTM D-1945 – Analysis of Natural Gas by Gas Chromatography
This method is used to measure fixed gases (such as oxygen, nitrogen, carbon monoxide, and carbon dioxide) and methane by gas chromatography (GC/TCD). Light hydrocarbons, including C1-C7, are analyzed by GC/FID. Samples are collected in pre-evacuated 6-Liter SUMMA canisters with pre-set flow controllers set to integrate over the desired test duration. The SUMMA® passivated canisters allow holding times up to 14 days for the TO-15 Method list of volatile organics. The sample gas is drawn by the canister vacuum through a micro-filter, pre-set orifice flow controller and on/off valve into the canister. The canister vacuum is monitored with a vacuum gauge to verify sample collection. The flow controller consisted of capillary orifice tubing designed to sample for a pre-set duration of 0.75hrs.

ASTM D-3588 – Standard Practice for Calculating Heat Value, Compressibility Factor, and Relative Density of Gaseous Fuels
This method uses the molar composition of gaseous fuel determined from Method ASTM D-1945 to calculate the heating value and F-factor.

ASTM D-5504 – Determination of Sulfur Compounds in Natural Gas and Gaseous Fuels by Gas Chromatography and Chemiluminescence
This method is used for the determination of speciated volatile sulfur-containing compounds in high methane content gaseous fuels by gas chromatography. Sulfur compounds are processed using a flame ionization detector (GC/FID). The products are then analyzed with a sulfur chemiluminescence detector (GC/SCD). Samples may be collected in Tedlar bags and analyzed within 24 hours or in Silco SUMMA canisters and analyzed within 72 hours.

EPA Compendium Method TO-15 – Determination of Toxic Organic Compounds in Ambient Air
This method is used to measure volatile organic compounds that are included in the hazardous air pollutants (HAPs) listed in Title III of the Clean Air Act Amendments of 1990 by GC/MS (gas chromatography/mass spectroscopy). Samples are collected in pre-evacuated 6-Liter SUMMA canisters with pre-set flow controllers set to integrate over the desired test duration. The SUMMA® passivated canisters allow holding times up to 14 days for the TO-15 Method list of volatile organics. The sample gas is drawn by the canister vacuum through a micro-filter, pre-set orifice flow controller and on/off valve into the canister. The canister vacuum is monitored with a vacuum gauge to verify sample collection. The flow controller consisted of capillary orifice tubing designed to sample for a pre-set duration of 0.75hrs.

Instrumentation: The following continuous emissions analyzers were used:

Instrument	Analyte	Principle
Servomex Model 1400	O_2	Paramagnetic
Servomex Model 1400	CO_2	Infrared (IR)
TECO Model 42C	NO / NO_2 / NO_X	Chemiluminescence
TECO Model 48C	CO	Gas Filter Correlation/IR
TECO Model 55C	THC/CH_4/VOC	Flame Ionization (FID)

Test Results: Emission results derived from the source test complied with permit conditions and are summarized below. Detailed results for individual test runs and Landfill Characterization results are provided in Tables 1 through 4.

Emission Parameter	Average Results Flare A-2	Permit Limits	Compliance Status
NO_X ppmvd @ 15% O_2	11.1	12	In Compliance
NO_X, lb/MMBtu	0.0432	0.05	In Compliance
CO ppmvd @ 15% O_2	18.1	81	In Compliance
CO, lb/MMBtu	0.0430	0.20	In Compliance
NMOC, ppmvd @ 3% O_2 as CH_4	<3.0	30 or >98%	In Compliance
NMOC Destruction Efficiency, %	>98.38		In Compliance
CH_4 Destruction Efficiency, %	>99.97	>99%	In Compliance
THC Destruction Efficiency, %	>99.97	>98%	In Compliance
TRS, ppmvd in LFG	439	1,300	In Compliance

Emission Parameter	Average Results Flare A-3	Permit Limits	Compliance Status
NO_X ppmvd @ 15% O_2	2.6	6	In Compliance
NO_X, lb/MMBtu	0.0104	0.025	In Compliance
CO ppmvd @ 15% O_2	2.0	24	In Compliance
CO, lb/MMBtu	<0.0048	0.060	In Compliance
NMOC, ppmvd @ 3% O_2 as CH_4	<2.4	30 or >98%	In Compliance
NMOC Destruction Efficiency, %	>98.85		In Compliance
CH_4 Destruction Efficiency, %	>99.97	>99%	In Compliance
THC Destruction Efficiency, %	>99.97	>98%	In Compliance
TRS, ppmvd in LFG	457	1,300	In Compliance

The appendices are organized as follows:

Calculations
: Calculations performed on the continuous emissions monitoring (CEM) data and flow rate calculations.

Laboratory Reports
: All laboratory reports and chain-of-custody documents.

Field Data Sheets
: CEMS data and any transcribed data from the strip charts.

Process Data
: Relevant and available facility process operating documentation.

Calibration Gas Certificates
: Certificates for the instrument calibration gas standards.

Stack Diagram
: Sketch or photograph of the stack.

Sample System Diagram
: Schematic of the sampling system configuration.

Permit to Operate / ATC
: Facility permits to operate or authority to construct.

Source Test Plan
: Sampling protocols submitted to BAAQMD prior to testing.

Comments: This source test was performed in accordance with the protocol submitted to BAAQMD. No deviations from the protocol or anomalies were observed during testing. No process interruptions were encountered, and no operational changes were required during the test program. The measured emissions met permit-required limits.

The work performed herein was conducted under my supervision, and I certify that:

a) the details and results contained within this report are to the best of my knowledge an authentic and accurate representation of the test program,

b) that the sampling and analytical procedures and data presented in the report is authentic and accurate,

c) that all testing details and conclusions are accurate and valid, and

d) that the production rate and/or heat input rate during the source test are reported accurately.

If this report is submitted for compliance purposes, it should only be reproduced in its entirety. If there are any questions concerning this report, please contact Jeramie Richardson at (810) 923-3181.

Prepared by

Anne Richardson

Reviewed by,

Jeramie Richardson

TABLE #1

Newby Island Landfill
Flare (A-2)

Parameter	Run 1	Run 2	Run 3	Average Results	Permit Limits
Test Date	2/7/24	2/7/24	2/7/24		
Test Time	0818-0906	0929-1015	1033-1118		
Standard Temperature, °F	70	70	70	70	
Fuel:					
Flare Temperature, °F	1,478	1,477	1,477	1,477	
Fuel Flow Rate, DSCFM	1,200	1,195	1,181	1,192	
Fuel Heat Input, MMBtu/hr	35.4	35.5	34.9	35.3	
Inlet Hydrogen Sulfide (H_2S), ppmv *(ASTM D5504)*	394	453	432	426	
Inlet TRS, ppmv as H_2S *(ASTM D5504)*	405	467	444	439	1,300
Stack Gas:					
Exhaust Flow Rate, DSCFM *(EPA Method 19)*	14,827	14,410	13,850	14,362	
Oxygen (O_2), % volume dry	13.2	12.9	12.8	12.9	
Carbon Dioxide (CO_2), % volume dry	6.5	6.6	6.8	6.7	
CO_2, lb/hr	6,589	6,521	6,467	6,526	
Water Vapor (H_2O), % volume *(EPA Method 4)*	7.46	9.25	7.62	8.11	
SO_2, ppmv *(calculated)*	32.8	38.7	37.8	36.5	
NO_X Emissions (reported as NO_2):					
NOx, ppmvd	14.4	15.0	15.3	14.9	
NOx, ppmvd @ 15% O_2	11.0	11.1	11.1	11.1	12
NOx, lb/hr	1.52	1.55	1.51	1.53	
NOx, lb/day	36.5	37.1	36.3	36.6	
NOx, lb/MMBtu	0.0429	0.0435	0.0433	0.0432	0.05
CO Emissions:					
CO, ppmvd	24.1	23.5	25.4	24.3	
CO, ppmvd @ 15% O_2	18.4	17.4	18.4	18.1	81
CO, lb/hr	1.55	1.47	1.53	1.52	
CO, lb/day	37.3	35.3	36.7	36.4	
CO, lb/MMBtu	0.0438	0.0414	0.0437	0.0430	0.20
THC Emissions (reported as CH_4):					
THC, ppmv wet *(EPA Method 25A)*	<10.0	<10.0	<10.0	<10.0	
THC, ppmvd	<10.8	<11.0	<10.8	<10.9	
THC, lb/hr	<0.40	<0.39	<0.37	<0.39	
Methane (CH_4) Emissions:					
CH_4, ppmv wet *(EPA Method 25A)*	<10.0	<10.0	<10.0	<10.0	
CH_4, ppmvd	<10.8	<11.0	<10.8	<10.9	
CH_4, lb/hr	<0.398	<0.394	<0.372	<0.388	
NMOC Emissions (reported as CH_4):					
NMOC, ppmv wet *(EPA Method 25A)*	<1.0	<1.0	1.7	<1.2	
NMOC, ppmvd	<1.1	<1.1	1.8	<1.3	
NMOC, ppmvd @ 3% O_2	<2.5	<2.5	3.9	<3.0	30
NMOC, lb/hr	<0.040	<0.039	0.06	<0.05	
Inlet Hydrocarbons:					
Inlet NMOC, ppmvd *(EPA Method 25C)*	914	1,059	958	977	
Inlet NMOC, lb/hr	2.72	3.14	2.81	2.89	
NMOC Destruction Efficiency, %	>98.54%	>98.74%	>97.81%	>98.38%	>98%
Inlet CH_4, ppmvd *(ASTM D-1945)*	489,000	493,000	489,000	490,333	
Inlet CH_4, lb/hr	1,457	1,462	1,433	1,451	
CH_4 Destruction Efficiency, %	>99.97%	>99.97%	>99.97%	>99.97%	>99%
Inlet THC (TOC), ppmvd	489,914	494,059	489,958	491,310	
Inlet THC (TOC), lb/hr	1,460	1,465	1,436	1,454	
THC (TOC) Destruction Efficiency, %	>99.97%	>99.97%	>99.97%	>99.97%	>98%

WHERE,

ppmvd = parts per million concentration by volume expressed on a dry gas basis

lb/hr = pound per hour emission rate

Tstd. = standard temperature (°R = °F+460)

MW = molecular weight

DSCFM = dry standard cubic feet per minute

NO_X = oxides of nitrogen, reported as NO_2 (MW = 46)

CO = carbon monoxide (MW = 28)

CH_4 = methane (MW = 16)

TOC = THC = total organic compounds, reported as CH_4 (MW = 16)

THC = total hydrocarbons, reported as CH_4 (MW = 16)

NMOC = non-methane organic compounds, reported as CH_4 (MW = 16)

CALCULATIONS,

15% O_2 Correction = ppm · 5.9 / (20.9 - %O_2)

3% O_2 Correction = ppm · 17.9 / (20.9 - %O_2)

lb/hr = ppm · 8.223 E-05 · DSCFM · MW / Tstd. °R

lb/day = lb/hr · 24

lb/MMBtu = Fd · MW · ppm · 2.59E-9 · 20.9/(20.9 - %O_2)

Destruction Efficiency = (inlet, lb/hr - outlet, lb/hr) / inlet, lb/hr

SO_2, ppm (calculated) = inlet TRS, ppmv · fuel flow rate, DSCFM/exhaust flow rate, DSCFM

<value = 2% of analyzer range

TABLE #2

AP42 2.4-1 - Landfill Gas Samples

Newby Island Landfill
Flare (A-2)

Constituent	Method	Units	Results 2/7/24 A-2 LFG Run 2
1,1,1-Trichloroethane	EPA TO-15	ppb	<47.1
1,1,2,2-Tetrachloroethane	EPA TO-15	ppb	<47.1
1,1-Dichloroethane (Ethylidene Dichloride)	EPA TO-15	ppb	<47.1
1,1-Dichloroethene (1,1-Dichloroethylene)	EPA TO-15	ppb	<47.1
1,2-Dichloroethane (Ethylene Dichloride)	EPA TO-15	ppb	73.5
1,2-Dichloropropane	EPA TO-15	ppb	<47.1
2-Propanol (Isopropyl Alcohol, IPA)	EPA TO-15	ppb	4,270
Acrylonitrile	EPA TO-15	ppb	<47.1
Bromodichloromethane	EPA TO-15	ppb	<47.1
Butane (C4)	EPA 18/ASTM 1945	ppm	0.00
Carbon Disulfide	EPA TO-15	ppb	<188
Carbon Monoxide	EPA 3C/ASTM 1945	%	0.1
Carbon Tetrachloride	EPA TO-15	ppb	<47.1
Carbonyl sulfide (COS)	ASTM D-5504	ppm	<0.083*
Chlorobenzene	EPA TO-15	ppb	<59.4
Chlorodifluoromethane	EPA TO-15	ppb	100
Chloroethane	EPA TO-15	ppb	<47.1
Chloroform	EPA TO-15	ppb	<47.1
Chloromethane	EPA TO-15	ppb	<47.1
1,3-Dichlorobenzene	EPA TO-15	ppb	<47.1
1,4-Dichlorobenzene	EPA TO-15	ppb	401
1,2-Dichlorobenzene	EPA TO-15	ppb	<47.1
Dichlorodifluoromethane	EPA TO-15	ppb	64.1
Dichlorofluoromethane	EPA TO-15	ppb	<47.1
Dichloromethane (Methylene Chloride)	EPA TO-15	ppb	<94.2
Dimethyl Sulfide	ASTM D-5504	ppm	1.78*
Ethane (C2)	EPA 18/ASTM 1945	ppm	<7.3
Ethanol	EPA TO-15	ppb	14,800
Ethyl Mercaptan	ASTM D-5504	ppm	0.310*
Ethyl Benzene	EPA TO-15	ppb	2,390
1,2 Dibromoethane (Ethylene Dibromide)	EPA TO-15	ppb	<47.1
Trichlorofluoromethane (Fluorotrichloromethane)	EPA TO-15	ppb	<47.1
Hexane	EPA TO-15	ppb	232
Hydrogen sulfide	ASTM D-5504	ppm	426*
2-Butanone (MEK)	EPA TO-15	ppb	9,540
Methyl isoButyl Ketone (MiBK)	EPA TO-15	ppb	662
Pentane (C5)	EPA 18/ASTM 1945	ppm	0.0
Tetrachloroethylene (Perchloroethylene)	EPA TO-15	ppb	49.0
Propane (C3)	EPA 18/ASTM 1945	ppm	18.8
trans-1,2-Dichloroethene (t-1,2-Dichloroethylene)	EPA TO-15	ppb	<47.1
Trichloroethylene (Trichloroethene)	EPA TO-15	ppb	<47.1
Vinyl Chloride	EPA TO-15	ppb	<47.1
m,p-Xylene	EPA TO-15	ppb	3,740
o-Xylene	EPA TO-15	ppb	1,460
Benzene	EPA TO-15	ppb	839
Toluene	EPA TO-15	ppb	4,220

* Results are the average of three samples

< = less than the method reporting limit

TABLE #3

Newby Island Landfill
Flare (A-3)

Parameter	Run 1	Run 2	Run 3	Average Results	Permit Limits
Test Date	2/7/24	2/7/24	2/7/24		
Test Time	1213-1300	1316-1402	1424-1510		
Standard Temperature, °F	70	70	70	70	
Fuel:					
Flare Temperature, °F	1,563	1,562	1,563	1,563	
Fuel Flow Rate, DSCFM	3,669	3,683	3,720	3,691	
Fuel Heat Input, MMBtu/hr	106.1	104.5	104.8	105.1	
Inlet Hydrogen Sulfide (H_2S), ppmv *(ASTM D5504)*	340	402	403	382	
Inlet TRS, ppmv as H_2S *(ASTM D5504)*	484	462	426	457	1,300
Stack Gas:					
Exhaust Flow Rate, DSCFM *(EPA Method 19)*	42,165	41,267	41,472	41,635	
Oxygen (O_2), % volume dry	12.7	12.6	12.7	12.7	
Carbon Dioxide (CO_2), % volume dry	6.8	6.9	6.9	6.9	
CO_2, lb/hr	19,655	19,430	19,487	19,524	
Water Vapor (H_2O), % volume *(EPA Method 4)*	10.63	9.90	9.59	10.04	
SO_2, ppmv *(calculated)*	42.1	41.2	38.2	40.5	
NO_X Emissions (reported as NO_2):					
NOx, ppmvd	3.8	3.5	3.7	3.7	
NOx, ppmvd @ 15% O_2	2.7	2.5	2.7	2.6	6
NOx, lb/hr	1.13	1.03	1.11	1.09	
NOx, lb/day	27.1	24.8	26.6	26.1	
NOx, lb/MMBtu	0.0107	0.0099	0.0106	0.0104	0.025
CO Emissions:					
CO, ppmvd	2.5	3.5	2.3	2.8	
CO, ppmvd @ 15% O_2	1.8	2.5	1.7	2.0	24
CO, lb/hr	0.46	0.63	0.42	0.51	
CO, lb/day	11.1	15.1	10.1	12.1	
CO, lb/MMBtu	0.0044	0.0060	0.0040	0.0048	0.060
THC Emissions (reported as CH_4):					
THC, ppmv wet *(EPA Method 25A)*	<10.0	<10.0	<10.0	<10.0	
THC, ppmvd	<11.2	<11.1	<11.1	<11.1	
THC, lb/hr	<1.17	<1.14	<1.14	<1.15	
Methane (CH_4) Emissions:					
CH_4, ppmv wet *(EPA Method 25A)*	<10.0	<10.0	<10.0	<10.0	
CH_4, ppmvd	<11.2	<11.1	<11.1	<11.1	
CH_4, lb/hr	<1.171	<1.137	<1.139	<1.149	
NMOC Emissions (reported as CH_4):					
NMOC, ppmv wet *(EPA Method 25A)*	<1.0	<1.0	<1.0	<1.0	
NMOC, ppmvd	<1.1	<1.1	<1.1	<1.1	
NMOC, ppmvd @ 3% O_2	<2.4	<2.4	<2.4	<2.4	30
NMOC, lb/hr	<0.117	<0.114	<0.11	<0.11	

Inlet Hydrocarbons:					
Inlet NMOC, ppmvd *(EPA Method 25C)*	1,147	1,118	1,002	1,089	
Inlet NMOC, lb/hr	10.45	10.22	9.25	9.98	
NMOC Destruction Efficiency, %	>98.88%	>98.89%	>98.77%	>98.85%	>98%
Inlet CH_4, ppmvd *(ASTM D-1945)*	478,000	469,000	466,000	471,000	
Inlet CH_4, lb/hr	4,354	4,288	4,303	4,315	
CH_4 Destruction Efficiency, %	>99.97%	>99.97%	>99.97%	>99.97%	>99%
Inlet THC (TOC), ppmvd	479,147	470,118	467,002	472,089	
Inlet THC (TOC), lb/hr	4,365	4,298	4,313	4,325	
THC (TOC) Destruction Efficiency, %	99.97%	99.97%	99.97%	99.97%	>98%

WHERE,

ppmvd = parts per million concentration by volume expressed on a dry gas basis
lb/hr = pound per hour emission rate
Tstd. = standard temperature (°R = °F+460)
MW = molecular weight
DSCFM = dry standard cubic feet per minute
NO_X = oxides of nitrogen, reported as NO_2 (MW = 46)
CO = carbon monoxide (MW = 28)
CH_4 = methane (MW = 16)
TOC = THC = total organic compounds, reported as CH_4 (MW = 16)
THC = total hydrocarbons, reported as CH_4 (MW = 16)
NMOC = non-methane organic compounds, reported as CH_4 (MW = 16)

CALCULATIONS,

15% O_2 Correction = ppm · 5.9 / (20.9 - %O_2)
3% O_2 Correction = ppm · 17.9 / (20.9 - %O_2)
lb/hr = ppm · 8.223 E-05 · DSCFM · MW / Tstd. °R
lb/day = lb/hr · 24
lb/MMBtu = Fd · MW · ppm · 2.59E-9 · 20.9/(20.9 - %O_2)
Destruction Efficiency = (inlet, lb/hr - outlet, lb/hr) / inlet, lb/hr
SO_2, ppm (calculated) = inlet TRS, ppmv · fuel flow rate, DSCFM/exhaust flow rate, DSCFM

<value = 2% of analyzer range

TABLE #4

AP42 2.4-1 - Landfill Gas Samples

Newby Island Landfill
Flare (A-3)

Constituent	Method	Units	Results 2/7/24 A-3 LFG Run 1
1,1,1-Trichloroethane	EPA TO-15	ppb	<40.2
1,1,2,2-Tetrachloroethane	EPA TO-15	ppb	<40.2
1,1-Dichloroethane (Ethylidene Dichloride)	EPA TO-15	ppb	<40.2
1,1-Dichloroethene (1,1-Dichloroethylene)	EPA TO-15	ppb	<40.2
1,2-Dichloroethane (Ethylene Dichloride)	EPA TO-15	ppb	76.4
1,2-Dichloropropane	EPA TO-15	ppb	<40.2
2-Propanol (Isopropyl Alcohol, IPA)	EPA TO-15	ppb	4,250
Acrylonitrile	EPA TO-15	ppb	<40.2
Bromodichloromethane	EPA TO-15	ppb	<40.2
Butane (C4)	EPA 18/ASTM 1945	ppm	7.3
Carbon Disulfide	EPA TO-15	ppb	<161
Carbon Monoxide	EPA 3C/ASTM 1945	%	<0.2
Carbon Tetrachloride	EPA TO-15	ppb	<40.2
Carbonyl sulfide (COS)	ASTM D-5504	ppm	<0.079*
Chlorobenzene	EPA TO-15	ppb	<66.8
Chlorodifluoromethane	EPA TO-15	ppb	117
Chloroethane	EPA TO-15	ppb	<56.3
Chloroform	EPA TO-15	ppb	<40.2
Chloromethane	EPA TO-15	ppb	<40.2
1,3-Dichlorobenzene	EPA TO-15	ppb	<40.2
1,4-Dichlorobenzene	EPA TO-15	ppb	358
1,2-Dichlorobenzene	EPA TO-15	ppb	<40.2
Dichlorodifluoromethane	EPA TO-15	ppb	65.2
Dichlorofluoromethane	EPA TO-15	ppb	<40.2
Dichloromethane (Methylene Chloride)	EPA TO-15	ppb	<80.4
Dimethyl Sulfide	ASTM D-5504	ppm	1.86*
Ethane (C2)	EPA 18/ASTM 1945	ppm	<0.8
Ethanol	EPA TO-15	ppb	12,100
Ethyl Mercaptan	ASTM D-5504	ppm	0.328*
Ethyl Benzene	EPA TO-15	ppb	2,430
1,2 Dibromoethane (Ethylene Dibromide)	EPA TO-15	ppb	<40.2
Trichlorofluoromethane (Fluorotrichloromethane)	EPA TO-15	ppb	<40.2
Hexane	EPA TO-15	ppb	243
Hydrogen sulfide	ASTM D-5504	ppm	445*
2-Butanone (MEK)	EPA TO-15	ppb	11,500
Methyl isoButyl Ketone (MiBK)	EPA TO-15	ppb	696
Pentane (C5)	EPA 18/ASTM 1945	ppm	19.4
Tetrachloroethylene (Perchloroethylene)	EPA TO-15	ppb	54.7
Propane (C3)	EPA 18/ASTM 1945	ppm	15.4
trans-1,2-Dichloroethene (t-1,2-Dichloroethylene)	EPA TO-15	ppb	<40.2
Trichloroethylene (Trichloroethene)	EPA TO-15	ppb	41.0
Vinyl Chloride	EPA TO-15	ppb	<40.2
m,p-Xylene	EPA TO-15	ppb	3,800
o-Xylene	EPA TO-15	ppb	1,500
Benzene	EPA TO-15	ppb	907
Toluene	EPA TO-15	ppb	4,300

* Results are the average of three samples

< = less than the method reporting limit

Appendix E – Well Exceedance Documentation

Root Cause Analysis and Corrective Action Analysis Forms

PRESSURE EXCEEDANCE

Root Cause Analysis

Date of Initial Exceedance:	8/6/2024
Collection Device ID:	NILHC256
Pressure Reading:	12.90

Root Cause Analysis		
Was the reason for the positive pressure due to one of the following:		
A fire or increased well temperature.	☐ Yes	☒ No
Use of a geomembrane or synthetic cover.	☐ Yes	☒ No
A decommissioned well.	☐ Yes	☒ No
• If YES to **ANY** of the above, exempt as per 40 CFR 62.16720(a)(3)(iii)/ 40 CFR §63.1958(b). • If NO to **ALL** of the above, continue the form.		
Describe what was inspected.		
Gas extraction well, vacuum source at the wellhead: (lateral is buried/inaccessible)		
Describe what was determined to be the root cause of the exceedance.		
Lack of vacuum on lateral riser, due to construction event in area.		
Determine the required next steps.		
Was the positive pressure remediated within 60 days since the initial exceedance?	☐ Yes	☒ No
• If YES, keep records of Root Cause Analysis. No reporting is required. • If NO, continue with the Corrective Action Analysis and Implementation Plan and submit a Notification to the state agency within 75 days of initial exceedance.		

PRESSURE EXCEEDANCE

Corrective Action Analysis and Implementation Schedule

Date of Initial Exceedance:	8/6/2024
Collection Device ID:	NILHC256
Pressure Reading:	12.90

Corrective Action Analysis
Describe the corrective actions taken to remediate exceedance.
In active construction area, waiting for operations to change directions to resolve the available vacuum issue.

Implementation Schedule	
Expected Start Date:	10/14/2024
Expected Completion Date:	11/15/2024
Provide a description of proposed repairs and/or remedial action required and supporting information for implementation timeframe.	
Construction event is wrapping up and a vacuum lateral will be installed to restore the vacuum at this well location.	

Final Steps		
Determine the required next steps.		
Is the remediation expected to take **less than 120 days** since initial exceedance per implementation schedule?	☒ Yes	☐ No
• If YES, send notification to state agency within 75 days of initial exceedance. Include Root Cause Analysis, Corrective Action Analysis, and Implementation Schedule in the next NSPS Report. • If NO, send Root Cause Analysis, Corrective Action Analysis, and Implementation Schedule to state agency within 75 days for approval and include in next NSPS Report.		

PRESSURE EXCEEDANCE

Root Cause Analysis

Date of Initial Exceedance:	8/6/2024
Collection Device ID:	NILHC257
Pressure Reading:	0.07

Root Cause Analysis		
Was the reason for the positive pressure due to one of the following:		
A fire or increased well temperature.	☐ Yes	☒ No
Use of a geomembrane or synthetic cover.	☐ Yes	☒ No
A decommissioned well.	☐ Yes	☒ No
• If YES to **ANY** of the above, exempt as per 40 CFR 62.16720(a)(3)(iii)/ 40 CFR §63.1958(b). • If NO to **ALL** of the above, continue the form.		
Describe what was inspected.		
Gas extraction well, vacuum source at the wellhead: (lateral is buried/inaccessible)		
Describe what was determined to be the root cause of the exceedance.		
Lack of vacuum on lateral riser, due to construction event in area.		
Determine the required next steps.		
Was the positive pressure remediated within 60 days since the initial exceedance?	☒ Yes	☐ No
• If YES, keep records of Root Cause Analysis. No reporting is required. • If NO, continue with the Corrective Action Analysis and Implementation Plan and submit a Notification to the state agency within 75 days of initial exceedance.		

PRESSURE EXCEEDANCE

Root Cause Analysis

Date of Initial Exceedance:	8/13/2024
Collection Device ID:	NILEW480
Pressure Reading:	0.78

Root Cause Analysis		
Was the reason for the positive pressure due to one of the following:		
A fire or increased well temperature.	☐ Yes	☒ No
Use of a geomembrane or synthetic cover.	☐ Yes	☒ No
A decommissioned well.	☐ Yes	☒ No
• If YES to **ANY** of the above, exempt as per 40 CFR 62.16720(a)(3)(iii)/ 40 CFR §63.1958(b). • If NO to **ALL** of the above, continue the form.		
Describe what was inspected.		
Gas extraction well, vacuum source at the wellhead: (lateral is buried/inaccessible)		
Describe what was determined to be the root cause of the exceedance.		
Lack of vacuum on lateral riser, due to construction event in area.		
Determine the required next steps.		
Was the positive pressure remediated within 60 days since the initial exceedance?	☒ Yes	☐ No
• If YES, keep records of Root Cause Analysis. No reporting is required. • If NO, continue with the Corrective Action Analysis and Implementation Plan and submit a Notification to the state agency within 75 days of initial exceedance.		

PRESSURE EXCEEDANCE

Root Cause Analysis

Date of Initial Exceedance:	8/13/2024
Collection Device ID:	NILEW753
Pressure Reading:	1.15

Root Cause Analysis		
Was the reason for the positive pressure due to one of the following:		
A fire or increased well temperature.	☐ Yes	☒ No
Use of a geomembrane or synthetic cover.	☐ Yes	☒ No
A decommissioned well.	☐ Yes	☒ No
• If YES to **ANY** of the above, exempt as per 40 CFR 62.16720(a)(3)(iii)/ 40 CFR §63.1958(b). • If NO to **ALL** of the above, continue the form.		
Describe what was inspected.		
Gas extraction well, vacuum source at the wellhead: (lateral is buried/inaccessible)		
Describe what was determined to be the root cause of the exceedance.		
Lack of vacuum on lateral riser, due to construction event in area.		
Determine the required next steps.		
Was the positive pressure remediated within 60 days since the initial exceedance?	☒ Yes	☐ No
• If YES, keep records of Root Cause Analysis. No reporting is required. • If NO, continue with the Corrective Action Analysis and Implementation Plan and submit a Notification to the state agency within 75 days of initial exceedance.		

PRESSURE EXCEEDANCE

Root Cause Analysis

Date of Initial Exceedance:	8/13/2024
Collection Device ID:	NILHC244
Pressure Reading:	0.18

Root Cause Analysis		
Was the reason for the positive pressure due to one of the following:		
A fire or increased well temperature.	☐ Yes	☒ No
Use of a geomembrane or synthetic cover.	☐ Yes	☒ No
A decommissioned well.	☐ Yes	☒ No
• If YES to **ANY** of the above, exempt as per 40 CFR 62.16720(a)(3)(iii)/ 40 CFR §63.1958(b). • If NO to **ALL** of the above, continue the form.		
Describe what was inspected.		
Gas extraction well, vacuum source at the wellhead: (lateral is buried/inaccessible)		
Describe what was determined to be the root cause of the exceedance.		
Lack of vacuum on lateral riser, due to construction event in area.		
Determine the required next steps.		
Was the positive pressure remediated within 60 days since the initial exceedance?	☐ Yes	☒ No
• If YES, keep records of Root Cause Analysis. No reporting is required. • If NO, continue with the Corrective Action Analysis and Implementation Plan and submit a Notification to the state agency within 75 days of initial exceedance.		

PRESSURE EXCEEDANCE

Corrective Action Analysis and Implementation Schedule

Date of Initial Exceedance:	8/13/2024
Collection Device ID:	NILHC244
Pressure Reading:	0.18

Corrective Action Analysis
Describe the corrective actions taken to remediate exceedance.
In active construction area, waiting for operations to change directions to resolve the available vacuum issue.

Implementation Schedule	
Expected Start Date:	10/1/2024
Expected Completion Date:	10/31/2024
Provide a description of proposed repairs and/or remedial action required and supporting information for implementation timeframe.	
Construction event is wrapping up and a vacuum lateral will be installed to restore the vacuum at this well location.	

Final Steps		
Determine the required next steps.		
Is the remediation expected to take **less than 120 days** since initial exceedance per implementation schedule?	☒ Yes	☐ No
• If YES, send notification to state agency within 75 days of initial exceedance. Include Root Cause Analysis, Corrective Action Analysis, and Implementation Schedule in the next NSPS Report. • If NO, send Root Cause Analysis, Corrective Action Analysis, and Implementation Schedule to state agency within 75 days for approval and include in next NSPS Report.		

TEMPERATURE EXCEEDANCE

Root Cause Analysis

Date of Initial Exceedance:	8/14/2024
Collection Device ID:	NILHC250
Temperature Reading:	142.60

Root Cause Analysis		
Has the owner/operator received approval from the state agency to operate at a temperature higher than 55°C (131°F) for this well?	☐ Yes	☒ No
• If YES, exempt as per 40 CFR 62.16720(a)(4)(iii)/ 40 CFR 63.1958(c). • If NO, continue the form.		
Describe what was inspected.		
Gas Sample and de-watering system.		
Describe what was determined to be the root cause of the exceedance.		
Elevated microbial activity		
Determine the required next steps.		
Submit HOV to the air board. Continue to monitor location.		
Was the temperature exceedance remediated within 60 days since the initial exceedance?	☐ Yes	☒ No
• If YES, keep records of Root Cause Analysis. No reporting is required. • If NO, continue with the Corrective Action Analysis and Implementation Plan and submit a Notification to the state agency within 75 days of initial exceedance.		

TEMPERATURE EXCEEDANCE

Corrective Action Analysis and Implementation Schedule

Date of Initial Exceedance:	8/14/2024
Collection Device ID:	NILHC250
Temperature Reading:	142.60

Corrective Action Analysis
Describe the corrective actions taken to remediate exceedance.
O&M to reduced applied vacuum to well
HOV letter sent to air district. Awaiting approval.

Implementation Schedule	
Expected Start Date:	11/1/2024
Expected Completion Date:	11/30/2024
Provide a description of proposed repairs and/or remedial action required and supporting information for implementation timeframe.	
Reduce vacuum/gas extraction. Application for temperature HOV pending approval	

Final Steps		
Determine the required next steps.		
Is the remediation expected to take **less than 120 days** since the initial exceedance per the implementation schedule?	☒ Yes	☐ No

- If YES, send a notification to the state agency within 75 days of initial exceedance. Include Root Cause Analysis, Corrective Action Analysis, and Implementation Schedule in the next Annual Report.
- If NO, send Root Cause Analysis, Corrective Action Analysis, and Implementation Schedule to state agency within 75 days for approval and include in next Annual Report.

PRESSURE EXCEEDANCE

Root Cause Analysis

Date of Initial Exceedance:	9/5/2024
Collection Device ID:	NILHC261
Pressure Reading:	0.14

Root Cause Analysis		
Was the reason for the positive pressure due to one of the following:		
A fire or increased well temperature.	☐ Yes	☒ No
Use of a geomembrane or synthetic cover.	☐ Yes	☒ No
A decommissioned well.	☐ Yes	☒ No
• If YES to **ANY** of the above, exempt as per 40 CFR 62.16720(a)(3)(iii)/ 40 CFR §63.1958(b). • If NO to **ALL** of the above, continue the form.		
Describe what was inspected.		
Gas extraction well, vacuum source at the wellhead: (lateral is buried/inaccessible)		
Describe what was determined to be the root cause of the exceedance.		
Lack of vacuum on lateral riser, due to construction event in area.		
Determine the required next steps.		
Was the positive pressure remediated within 60 days since the initial exceedance?	☒ Yes	☐ No
• If YES, keep records of Root Cause Analysis. No reporting is required. • If NO, continue with the Corrective Action Analysis and Implementation Plan and submit a Notification to the state agency within 75 days of initial exceedance.		

PRESSURE EXCEEDANCE

Root Cause Analysis

Date of Initial Exceedance:	9/5/2024
Collection Device ID:	NILHC262
Pressure Reading:	0.11

Root Cause Analysis		
Was the reason for the positive pressure due to one of the following:		
A fire or increased well temperature.	☐ Yes	☒ No
Use of a geomembrane or synthetic cover.	☐ Yes	☒ No
A decommissioned well.	☐ Yes	☒ No
• If YES to **ANY** of the above, exempt as per 40 CFR 62.16720(a)(3)(iii)/ 40 CFR §63.1958(b). • If NO to **ALL** of the above, continue the form.		
Describe what was inspected.		
Gas extraction well, vacuum source at the wellhead: (lateral is buried/inaccessible)		
Describe what was determined to be the root cause of the exceedance.		
Lack of vacuum on lateral riser, due to construction event in area.		
Determine the required next steps.		
Was the positive pressure remediated within 60 days since the initial exceedance?	☒ Yes	☐ No
• If YES, keep records of Root Cause Analysis. No reporting is required. • If NO, continue with the Corrective Action Analysis and Implementation Plan and submit a Notification to the state agency within 75 days of initial exceedance.		

PRESSURE EXCEEDANCE

Root Cause Analysis

Date of Initial Exceedance:	9/27/2024
Collection Device ID:	NILEW799
Pressure Reading:	0.01

Root Cause Analysis		
Was the reason for the positive pressure due to one of the following:		
A fire or increased well temperature.	☐ Yes	☒ No
Use of a geomembrane or synthetic cover.	☐ Yes	☒ No
A decommissioned well.	☐ Yes	☒ No
• If YES to **ANY** of the above, exempt as per 40 CFR 62.16720(a)(3)(iii)/ 40 CFR §63.1958(b). • If NO to **ALL** of the above, continue the form.		
Describe what was inspected.		
Gas extraction well, vacuum source at the wellhead: (lateral is buried/inaccessible)		
Describe what was determined to be the root cause of the exceedance.		
Lack of vacuum on lateral riser, due to construction event in area.		
Determine the required next steps.		
Was the positive pressure remediated within 60 days since the initial exceedance?	☒ Yes	☐ No
• If YES, keep records of Root Cause Analysis. No reporting is required. • If NO, continue with the Corrective Action Analysis and Implementation Plan and submit a Notification to the state agency within 75 days of initial exceedance.		

75-Day Notification Letters
(including relevant Higher Operating Value requests)

Newby Island Landfill 1601 Dixon Landing Road, Milpitas, CA 95035
o 408.586.2263 c 510.298.7892 republicservices.com

August 30, 2024

Tamiko Endow
Senior Air Quality Engineer
Bay Area Air Quality Management District
375 Beale Street, Suite 600
San Francisco, CA 94105

Re: 75-Day Notification of Pressure Exceedance
International Disposal Corp. of California, Milpitas, California
Facility Number A9013

Ms. Endow:

International Disposal Corp. of CA (IDCC), owner and operator of the Newby Island Landfill (Newby), located in Milpitas, California, hereby provides the Bay Area Air Quality Management District (BAAQMD or District) with a 75-day notification pursuant to the compliance provisions identified in Title 40 of the Code of Federal Regulations (CFR) Section 60.767(j)(2) for a pressure exceedance at NILEW480.

The initial pressure exceedance occurred at NILEW480 on May 14, 2024. The well had an initial positive pressure reading of 3.85 inches water column ("H_2O). Corrective actions were initiated within 5 days as the valve was adjusted; however, the well could not be brought back into compliance within 15 days.

As required under 40 CFR 60.765(a)(5) and 40 CFR 63.1960(a)(3)(i)(A), a root cause analysis was completed within 60 days from the original exceedance for the well. When the well could not be corrected within 60 days, a corrective action analysis and implementation schedule was completed. Copies of these forms are attached. All the steps for compliance were conducted, however, NILEW480 remains in exceedance as of submittal of this notification. As such, this 75-day notification is required. The well will be remediated prior to the 120-day deadline.

If you have any questions or require additional information, please do not hesitate to contact Jon Freedman at (408) 586-2263 or by email at jfreedman@republicservices.com or Sean Bass at (209)-345-2458 or by email at SBass@scsengineers.com.

Sincerely,

Jon Freedman
Environmental Manager
Newby Island Landfill

cc: Ben Wade, Newby Island
Sean Bass, SCS Field Services
Maria Bowen, SCS Engineers

Aleah Zapf, BAAQMD
Administrator, U.S. EPA Region 9

Attachment A: Root Cause Analysis Form and Corrective Action Analysis and Implementation Schedule Form

Attachment A:
Root Cause Analysis Form and
Corrective Action Analysis and Implementation Schedule Form

PRESSURE EXCEEDANCE

Root Cause Analysis

Date of Initial Exceedance:	5/14/2024
Collection Device ID:	NILEW480
Pressure Reading:	3.85

Root Cause Analysis		
Was the reason for the positive pressure due to one of the following:		
A fire or increased well temperature.	☐ Yes	☒ No
Use of a geomembrane or synthetic cover.	☐ Yes	☒ No
A decommissioned well.	☐ Yes	☒ No
• If YES to **ANY** of the above, exempt as per 40 CFR 62.16720(a)(3)(iii)/ 40 CFR §63.1958(b). • If NO to **ALL** of the above, continue the form.		
Describe what was inspected.		
Gas extraction well, vacuum source at the wellhead: (lateral is buried/inaccessible)		
Describe what was determined to be the root cause of the exceedance.		
Lack of vacuum on lateral riser, due to H2S drum obstructed on vacuum lateral.		
Determine the required next steps.		
Was the positive pressure remediated within 60 days since the initial exceedance?	☐ Yes	☒ No
• If YES, keep records of Root Cause Analysis. No reporting is required. • If NO, continue with the Corrective Action Analysis and Implementation Plan and submit a Notification to the state agency within 75 days of initial exceedance.		

PRESSURE EXCEEDANCE

Corrective Action Analysis and Implementation Schedule

Date of Initial Exceedance:	5/14/2024
Collection Device ID:	NILEW480
Pressure Reading:	3.85

Corrective Action Analysis
Describe the corrective actions taken to remediate exceedance.
In active construction area with vacuum lateral removed for construction operations

Implementation Schedule	
Expected Start Date:	8/5/2024
Expected Completion Date:	9/6/2024
Provide a description of proposed repairs and/or remedial action required and supporting information for implementation timeframe.	
Construction event is wrapping up and new vacuum lateral will be installed to restore vacuum at this well location.	

Final Steps		
Determine the required next steps.		
Is the remediation expected to take **<u>less than 120 days</u>** since initial exceedance per implementation schedule?	☒ Yes	☐ No
• If YES, send notification to state agency within 75 days of initial exceedance. Include Root Cause Analysis, Corrective Action Analysis, and Implementation Schedule in the next NSPS Report. • If NO, send Root Cause Analysis, Corrective Action Analysis, and Implementation Schedule to state agency within 75 days for approval and include in next NSPS Report.		

Newby Island Landfill 1601 Dixon Landing Road, Milpitas, CA 95035
o 408.586.2263 c 510.298.7892 republicservices.com

August 30, 2024

Tamiko Endow
Senior Air Quality Engineer
Bay Area Air Quality Management District
375 Beale Street, Suite 600
San Francisco, CA 94105

Re: 75-Day Notification of Pressure Exceedance
International Disposal Corp. of California, Milpitas, California
Facility Number A9013

Ms. Endow:

International Disposal Corp. of CA (IDCC), owner and operator of the Newby Island Landfill (Newby), located in Milpitas, California, hereby provides the Bay Area Air Quality Management District (BAAQMD or District) with a 75-day notification pursuant to the compliance provisions identified in Title 40 of the Code of Federal Regulations (CFR) Section 60.767(j)(2) for a pressure exceedance at NILEW512.

The initial pressure exceedance occurred at NILEW512 on May 14, 2024. The well had an initial positive pressure reading of 1.72 inches water column ("H_2O). Corrective actions were initiated within 5 days as the valve was adjusted; however, the well could not be brought back into compliance within 15 days.

As required under 40 CFR 60.765(a)(5) and 40 CFR 63.1960(a)(3)(i)(A), a root cause analysis was completed within 60 days from the original exceedance for the well. When the well could not be corrected within 60 days, a corrective action analysis and implementation schedule was completed. Copies of these forms are attached. All the steps for compliance were conducted and NILEW512 returned to negative pressure on July 30, 2024.

If you have any questions or require additional information, please do not hesitate to contact Jon Freedman at (408) 586-2263 or by email at jfreedman@republicservices.com or Sean Bass at (209)-345-2458 or by email at SBass@scsengineers.com.

Sincerely,

Jon Freedman
Environmental Manager
Newby Island Landfill

cc: Ben Wade, Newby Island
Sean Bass, SCS Field Services
Maria Bowen, SCS Engineers
Aleah Zapf, BAAQMD

Administrator, U.S. EPA Region 9

Attachment A: Root Cause Analysis Form and Corrective Action Analysis and Implementation Schedule Form

Attachment A:

Root Cause Analysis Form and
Corrective Action Analysis and Implementation Schedule Form

PRESSURE EXCEEDANCE

Root Cause Analysis

Date of Initial Exceedance:	5/14/2024
Collection Device ID:	NILEW512
Pressure Reading:	1.72

Root Cause Analysis		
Was the reason for the positive pressure due to one of the following:		
A fire or increased well temperature.	☐ Yes	☒ No
Use of a geomembrane or synthetic cover.	☐ Yes	☒ No
A decommissioned well.	☐ Yes	☒ No
• If YES to **ANY** of the above, exempt as per 40 CFR 62.16720(a)(3)(iii)/ 40 CFR §63.1958(b). • If NO to **ALL** of the above, continue the form.		
Describe what was inspected.		
Gas extraction well, vacuum source at the wellhead: (lateral is buried/inaccessible)		
Describe what was determined to be the root cause of the exceedance.		
Lack of vacuum on lateral riser, due to H2S drum obstructed on vacuum lateral.		
Determine the required next steps.		
Was the positive pressure remediated within 60 days since the initial exceedance?	☐ Yes	☒ No
• If YES, keep records of Root Cause Analysis. No reporting is required. • If NO, continue with the Corrective Action Analysis and Implementation Plan and submit a Notification to the state agency within 75 days of initial exceedance.		

PRESSURE EXCEEDANCE

Corrective Action Analysis and Implementation Schedule

Date of Initial Exceedance:	5/14/2024
Collection Device ID:	NILEW512
Pressure Reading:	1.72

Corrective Action Analysis
Describe the corrective actions taken to remediate exceedance.
In active construction area with vacuum lateral removed for construction operations

Implementation Schedule	
Expected Start Date:	7/29/2024
Expected Completion Date:	9/6/2024
Provide a description of proposed repairs and/or remedial action required and supporting information for implementation timeframe.	
Construction event is wrapping up and new vacuum lateral will be installed to restore vacuum at this well location.	

Final Steps		
Determine the required next steps.		
Is the remediation expected to take **<u>less than 120 days</u>** since initial exceedance per implementation schedule?	☒ Yes	☐ No
• If YES, send notification to state agency within 75 days of initial exceedance. Include Root Cause Analysis, Corrective Action Analysis, and Implementation Schedule in the next NSPS Report. • If NO, send Root Cause Analysis, Corrective Action Analysis, and Implementation Schedule to state agency within 75 days for approval and include in next NSPS Report.		

Newby Island Landfill 1601 Dixon Landing Road, Milpitas, CA 95035
o 408.586.2263 c 510.298.7892 republicservices.com

August 30, 2024

Tamiko Endow
Senior Air Quality Engineer
Bay Area Air Quality Management District
375 Beale Street, Suite 600
San Francisco, CA 94105

Re: 75-Day Notification of Pressure Exceedance
International Disposal Corp. of California, Milpitas, California
Facility Number A9013

Ms. Endow:

International Disposal Corp. of CA (IDCC), owner and operator of the Newby Island Landfill (Newby), located in Milpitas, California, hereby provides the Bay Area Air Quality Management District (BAAQMD or District) with a 75-day notification pursuant to the compliance provisions identified in Title 40 of the Code of Federal Regulations (CFR) Section 60.767(j)(2) for a pressure exceedance at NILEW690.

The initial pressure exceedance occurred at NILEW690 on May 9, 2024. The well had an initial positive pressure reading of 6.03 inches water column ("H_2O). Corrective actions were initiated within 5 days as the valve was adjusted; however, the well could not be brought back into compliance within 15 days.

As required under 40 CFR 60.765(a)(5) and 40 CFR 63.1960(a)(3)(i)(A), a root cause analysis was completed within 60 days from the original exceedance for the well. When the well could not be corrected within 60 days, a corrective action analysis and implementation schedule was completed. Copies of these forms are attached. All the steps for compliance were conducted, however, NILEW690 remains in exceedance as of submittal of this notification. As such, this 75-day notification is required. The well will be remediated prior to the 120-day deadline.

If you have any questions or require additional information, please do not hesitate to contact Jon Freedman at (408) 586-2263 or by email at jfreedman@republicservices.com or Sean Bass at (209)-345-2458 or by email at SBass@scsengineers.com.

Sincerely,

Jon Freedman
Environmental Manager
Newby Island Landfill

cc: Ben Wade, Newby Island
Sean Bass, SCS Field Services
Maria Bowen, SCS Engineers

Aleah Zapf, BAAQMD
Administrator, U.S. EPA Region 9

Attachment A: Root Cause Analysis Form and Corrective Action Analysis and Implementation Schedule Form

Attachment A:
Root Cause Analysis Form and
Corrective Action Analysis and Implementation Schedule Form

PRESSURE EXCEEDANCE

Root Cause Analysis

Date of Initial Exceedance:	5/9/2024
Collection Device ID:	NILEW690
Pressure Reading:	6.03

Root Cause Analysis		
Was the reason for the positive pressure due to one of the following:		
A fire or increased well temperature.	☐ Yes	☒ No
Use of a geomembrane or synthetic cover.	☐ Yes	☒ No
A decommissioned well.	☐ Yes	☒ No
• If YES to **ANY** of the above, exempt as per 40 CFR 62.16720(a)(3)(iii)/ 40 CFR §63.1958(b). • If NO to **ALL** of the above, continue the form.		
Describe what was inspected.		
Gas extraction well, vacuum source at the wellhead: (lateral is buried/inaccessible)		
Describe what was determined to be the root cause of the exceedance.		
Lack of vacuum on lateral riser, due to H2S drum obstructed on vacuum lateral.		
Determine the required next steps.		
Was the positive pressure remediated within 60 days since the initial exceedance?	☐ Yes	☒ No
• If YES, keep records of Root Cause Analysis. No reporting is required. • If NO, continue with the Corrective Action Analysis and Implementation Plan and submit a Notification to the state agency within 75 days of initial exceedance.		

PRESSURE EXCEEDANCE

Corrective Action Analysis and Implementation Schedule

Date of Initial Exceedance:	5/9/2024
Collection Device ID:	NILEW690
Pressure Reading:	6.03

Corrective Action Analysis
Describe the corrective actions taken to remediate exceedance.
In active construction area with vacuum lateral removed for construction operations

Implementation Schedule	
Expected Start Date:	8/5/2024
Expected Completion Date:	9/6/2024
Provide a description of proposed repairs and/or remedial action required and supporting information for implementation timeframe.	
Construction event is wrapping up and new vacuum lateral will be installed to restore vacuum at this well location.	

Final Steps		
Determine the required next steps.		
Is the remediation expected to take **less than 120 days** since initial exceedance per implementation schedule?	☒ Yes	☐ No
• If YES, send notification to state agency within 75 days of initial exceedance. Include Root Cause Analysis, Corrective Action Analysis, and Implementation Schedule in the next NSPS Report. • If NO, send Root Cause Analysis, Corrective Action Analysis, and Implementation Schedule to state agency within 75 days for approval and include in next NSPS Report.		

Newby Island Landfill 1601 Dixon Landing Road, Milpitas, CA 95035
o 408.586.2263 c 510.298.7892 republicservices.com

August 30, 2024

Tamiko Endow
Senior Air Quality Engineer
Bay Area Air Quality Management District
375 Beale Street, Suite 600
San Francisco, CA 94105

Re: 75-Day Notification of Pressure Exceedance
International Disposal Corp. of California, Milpitas, California
Facility Number A9013

Ms. Endow:

International Disposal Corp. of CA (IDCC), owner and operator of the Newby Island Landfill (Newby), located in Milpitas, California, hereby provides the Bay Area Air Quality Management District (BAAQMD or District) with a 75-day notification pursuant to the compliance provisions identified in Title 40 of the Code of Federal Regulations (CFR) Section 60.767(j)(2) for a pressure exceedance at NILEW735.

The initial pressure exceedance occurred at NILEW735 on May 9, 2024. The well had an initial positive pressure reading of 2.41 inches water column ("H_2O). Corrective actions were initiated within 5 days as the valve was adjusted; however, the well could not be brought back into compliance within 15 days.

As required under 40 CFR 60.765(a)(5) and 40 CFR 63.1960(a)(3)(i)(A), a root cause analysis was completed within 60 days from the original exceedance for the well. When the well could not be corrected within 60 days, a corrective action analysis and implementation schedule was completed. Copies of these forms are attached. All the steps for compliance were conducted and NILEW735 returned to negative pressure on July 30, 2024.

If you have any questions or require additional information, please do not hesitate to contact Jon Freedman at (408) 586-2263 or by email at jfreedman@republicservices.com or Sean Bass at (209)-345-2458 or by email at SBass@scsengineers.com.

Sincerely,

Jon Freedman
Environmental Manager
Newby Island Landfill

cc: Ben Wade, Newby Island
Sean Bass, SCS Field Services
Maria Bowen, SCS Engineers
Aleah Zapf, BAAQMD

Administrator, U.S. EPA Region 9

Attachment A: Root Cause Analysis Form and Corrective Action Analysis and Implementation Schedule Form

Attachment A:

Root Cause Analysis Form and
Corrective Action Analysis and Implementation Schedule Form

PRESSURE EXCEEDANCE

Root Cause Analysis

Date of Initial Exceedance:	5/9/2024
Collection Device ID:	NILEW735
Pressure Reading:	2.41

Root Cause Analysis		
Was the reason for the positive pressure due to one of the following:		
A fire or increased well temperature.	☐ Yes	☒ No
Use of a geomembrane or synthetic cover.	☐ Yes	☒ No
A decommissioned well.	☐ Yes	☒ No
• If YES to **ANY** of the above, exempt as per 40 CFR 62.16720(a)(3)(iii)/ 40 CFR §63.1958(b). • If NO to **ALL** of the above, continue the form.		
Describe what was inspected.		
Gas extraction well, vacuum source at the wellhead: (lateral is buried/inaccessible)		
Describe what was determined to be the root cause of the exceedance.		
Lack of vacuum on lateral riser, due to H2S drum obstructed on vacuum lateral.		
Determine the required next steps.		
Was the positive pressure remediated within 60 days since the initial exceedance?	☐ Yes	☒ No
• If YES, keep records of Root Cause Analysis. No reporting is required. • If NO, continue with the Corrective Action Analysis and Implementation Plan and submit a Notification to the state agency within 75 days of initial exceedance.		

PRESSURE EXCEEDANCE

Corrective Action Analysis and Implementation Schedule

Date of Initial Exceedance:	5/9/2024
Collection Device ID:	NILEW735
Pressure Reading:	2.41

Corrective Action Analysis
Describe the corrective actions taken to remediate exceedance.
In active construction area with vacuum lateral removed for construction operations

Implementation Schedule	
Expected Start Date:	7/29/2024
Expected Completion Date:	9/6/2024
Provide a description of proposed repairs and/or remedial action required and supporting information for implementation timeframe.	
Construction event is wrapping up and new vacuum lateral will be installed to restore vacuum at this well location.	

Final Steps		
Determine the required next steps.		
Is the remediation expected to take **less than 120 days** since initial exceedance per implementation schedule?	☒ Yes	☐ No
• If YES, send notification to state agency within 75 days of initial exceedance. Include Root Cause Analysis, Corrective Action Analysis, and Implementation Schedule in the next NSPS Report. • If NO, send Root Cause Analysis, Corrective Action Analysis, and Implementation Schedule to state agency within 75 days for approval and include in next NSPS Report.		

Newby Island Landfill 1601 Dixon Landing Road, Milpitas, CA 95035
o 408.586.2263 c 510.298.7892 republicservices.com

September 9, 2024

Tamiko Endow
Senior Air Quality Engineer
Bay Area Air Quality Management District
375 Beale Street, Suite 600
San Francisco, CA 94105

Re: 75-Day Notification of Pressure Exceedance
International Disposal Corp. of California, Milpitas, California
Facility Number A9013

Ms. Endow:

International Disposal Corp. of CA (IDCC), owner and operator of the Newby Island Landfill (Newby), located in Milpitas, California, hereby provides the Bay Area Air Quality Management District (BAAQMD or District) with a 75-day notification pursuant to the compliance provisions identified in Title 40 of the Code of Federal Regulations (CFR) Section 60.767(j)(2) for a pressure exceedance at NILHC244.

The initial pressure exceedance occurred at NILHC244 on July 10, 2024. The well had an initial positive pressure reading of 0.18 inches water column ("H_2O). Corrective actions were initiated within 5 days as the valve was adjusted; however, the well could not be brought back into compliance within 15 days.

As required under 40 CFR 60.765(a)(5) and 40 CFR 63.1960(a)(3)(i)(A), a root cause analysis was completed within 60 days from the original exceedance for the well. When the well could not be corrected within 60 days, a corrective action analysis and implementation schedule was completed. Copies of these forms are attached. All the steps for compliance were conducted, however, NILHC244 remains in exceedance as of submittal of this notification. As such, this 75-day notification is required. The well will be remediated prior to the 120-day deadline.

If you have any questions or require additional information, please do not hesitate to contact Jon Freedman at (408) 586-2263 or by email at jfreedman@republicservices.com or Sean Bass at (209)-345-2458 or by email at SBass@scsengineers.com.

Sincerely,

Jon Freedman
Environmental Manager
Newby Island Landfill

cc: Sean Bass, SCS Field Services
Maria Bowen, SCS Engineers
Aleah Zapf, BAAQMD
Administrator, U.S. EPA Region 9

Attachment A: Root Cause Analysis Form and Corrective Action Analysis and Implementation Schedule Form

Attachment A:
Root Cause Analysis Form and
Corrective Action Analysis and Implementation Schedule Form

PRESSURE EXCEEDANCE

Root Cause Analysis

Date of Initial Exceedance:	7/10/2024
Collection Device ID:	NILHC244
Pressure Reading:	0.18

Root Cause Analysis		
Was the reason for the positive pressure due to one of the following:		
A fire or increased well temperature.	☐ Yes	☒ No
Use of a geomembrane or synthetic cover.	☐ Yes	☒ No
A decommissioned well.	☐ Yes	☒ No
• If YES to **ANY** of the above, exempt as per 40 CFR 62.16720(a)(3)(iii)/ 40 CFR §63.1958(b). • If NO to **ALL** of the above, continue the form.		
Describe what was inspected.		
Gas extraction well, vacuum source at the wellhead: (lateral is buried/inaccessible)		
Describe what was determined to be the root cause of the exceedance.		
Lack of vacuum on lateral riser, due to construction event in area.		
Determine the required next steps.		
Was the positive pressure remediated within 60 days since the initial exceedance?	☐ Yes	☒ No
• If YES, keep records of Root Cause Analysis. No reporting is required. • If NO, continue with the Corrective Action Analysis and Implementation Plan and submit a Notification to the state agency within 75 days of initial exceedance.		

PRESSURE EXCEEDANCE

Corrective Action Analysis and Implementation Schedule

Date of Initial Exceedance:	7/10/2024
Collection Device ID:	NILHC244
Pressure Reading:	0.18

Corrective Action Analysis
Describe the corrective actions taken to remediate exceedance.
In active construction area with vacuum lateral removed for construction operations

Implementation Schedule	
Expected Start Date:	9/2/2024
Expected Completion Date:	11/1/2024
Provide a description of proposed repairs and/or remedial action required and supporting information for implementation timeframe.	
Construction event is wrapping up and a new vacuum lateral will be installed to restore the vacuum at this well location.	

Final Steps		
Determine the required next steps.		
Is the remediation expected to take **<u>less than 120 days</u>** since initial exceedance per implementation schedule?	☒ Yes	☐ No
• If YES, send notification to state agency within 75 days of initial exceedance. Include Root Cause Analysis, Corrective Action Analysis, and Implementation Schedule in the next NSPS Report. • If NO, send Root Cause Analysis, Corrective Action Analysis, and Implementation Schedule to state agency within 75 days for approval and include in next NSPS Report.		

Appendix F – Title V Semi-Annual Report

NEWBY ISLAND LANDFILL

TITLE V SEMI-ANNUAL MONITORING REPORT

SITE: NEWBY ISLAND LANDFILL	**FACILITY ID#:** A9013
REPORTING PERIOD: *from* 08/01/2024	*through* 01/31/2025

CERTIFICATION:

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

Paul Enrique Perez
Signature of Responsible Official

02/24/2025
Date

Enrique Perez
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

NEWBY ISLAND LANDFILL

TITLE V SEMI-ANNUAL MONITORING REPORT

SITE: NEWBY ISLAND LANDFILL	**FACILITY ID#:** A9013
REPORTING PERIOD: *from* 08/01/2024	*through* 01/31/2025

List of Permitted Sources and Abatement Device

Permit Unit Number	**Equipment Description**
S-#	**Description**
S-2	Newby Island Sanitary Landfill – Waste Decomposition Process; Equipped with Landfill Gas Collection System
S-3	Composting Operation; A-3 Water Truck
S-4	Non-retail Gasoline Dispensing Facility
S-5	Newby Island Sanitary Landfill – Waste and Cover Material Dumping
S-6	Newby Island Sanitary Landfill – Excavating, Bulldozing and Compacting Activities
S-7	Diesel Engine Powering Air Compressor
S-8 and S-9	Horizontal Grinder/Operations, Trommel Screen/Operations
S-10	Screening/Separating, Multi-material Recycling Sorting Line
S-153	Portable Self-Propelled Horizontal Grinder with Conveyor
S-156	Portable Diesel Engine Propel/Power Grinder
S-1003	Composting, aerated static piles, Green waste Composting Operations
S-1008	Waste material grinding, Multi-material Portable Tub Grinder
S-1009	Screening/Separating, Green waste, Portable Power Screen
S-1038	Portable Diesel Engine Powering 3300 Screen
S-1040	Portable Diesel Engine Powering Power Screen
S-1042	Portable Diesel Engine Powering Power Screen
S-1043	Screening/Separating, Green waste, Portable 3300 Screen
S-1055	Stationary Prime Diesel Engine Powering CASP Blower
S-1056	Stationary Prime Diesel Engine Powering CASP Blower
S-1057	Portable Backup Prime Diesel Engine
A-2	Landfill Gas Flare
A-3	Landfill Gas Flare

Newby maintains a Title V Permit (Facility No. A9013), which expired on December 20, 2017. On June 20, 2017, a Title V Renewal Application was submitted to the Bay Area Air Quality Management District (BAAQMD). The site currently operates under an application shield. On November 30, 2021, Mr. Dennis Jang with the BAAQMD informed IDCC that the renewal application (Application Number [A/N] 28723) is open and in process and another renewal application will not be needed.

The conditions listed below are incorporated in the BAAQMD Permit to Operate (PTO) that expires August 1, 2025 but has not yet been incorporated into the Title V permit. All conditions have been reviewed for compliance.

- Condition #24887 – applies to S#4;
- Condition #26046 – applies to S#7, 8, 9, 10;
- Condition #26606 – applies to S#1008;
- Condition #26607 – applies to S#1040;
- Condition #26608 – applies to S#1009;
- Condition #26609 – applies to S#1042;
- Condition #26610 – applies to S#1043;
- Condition #26611 – applies to S#1038;
- Condition #27359 – applies to S#153
- Condition #27446 – applies S#1057; and
- Condition #27477 – applies to S#1055, 1056.

During the compilation of this report, no deviations from the permit conditions listed above were discovered.

NEWBY ISLAND LANDFILL

TITLE V SEMI-ANNUAL MONITORING REPORT

Site: Newby Island Landfill	**Facility ID#:** A9013
Permitted Unit: S-2 WASTE DECOMPOSITION PROCESS WITH GAS COLLECTION SYSTEM, A-2 AND A-3 LANDFILL GAS FLARE; S-5 WASTE AND COVER MATERIAL DUMPING; S-6 EXCAVATING, BULLDOZING, AND COMPACTING ACTIVITIES	**Reporting Period:** *from* 08/01/2024 *through* 01/31/2025

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
Collection System Installation Dates	BAAQMD 8-34-501.7 and 501.8 and BAAQMD Condition # 10423, Part 13b, 13c, 13f, 13g	Records	Periodic / On event basis	BAAQMD 8-34-304.2	For Active Areas: Collection system components must be installed and operating by 5 years + 60 days after initial waste placement	Continuous	N/A
Collection System Installation Dates	BAAQMD 8-34-501.7 and 501.8 and BAAQMD Condition # 10423, Part 13b, 13c, 13f, 13g	Records	Periodic / On event basis	BAAQMD 8-34-304.3	For Any Uncontrolled Areas or Cells: collection system components must be installed and operating within 60 days after the uncontrolled area or cell accumulates 1,000,000 tons of decomposable waste	Continuous	N/A
Gas Flow	BAAQMD 8-34-501.10 and 508	Gas Flow Meter and Recorder (every 15 minutes)	Continuous	BAAQMD 8-34-301 and 301.1	Landfill gas collection system shall operate continuously and all collected gases shall be vented to a properly operating control system	Intermittent	Shutdowns of the gas collection and control system (GCCS) during the reporting period were planned and met the exemption requirements of BAAQMD 8-34-113. On November 21, 2024, a Reportable Compliance Activity (RCA) and Request for Breakdown Relief was submitted to the

NEWBY ISLAND LANDFILL

TITLE V SEMI-ANNUAL MONITORING REPORT

Site: Newby Island Landfill	**Facility ID#:** A9013
Permitted Unit: S-2 WASTE DECOMPOSITION PROCESS WITH GAS COLLECTION SYSTEM, A-2 AND A-3 LANDFILL GAS FLARE; S-5 WASTE AND COVER MATERIAL DUMPING; S-6 EXCAVATING, BULLDOZING, AND COMPACTING ACTIVITIES	**Reporting Period:** *from* 08/01/2024 *through* 01/31/2025

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
							BAAQMD for a GCCS shutdown due to a power surge. The event was assigned RCA ID 200819/200820. The required 10- and 30-day Title V reports were submitted within the required timeframes, respectively.
Gas Flow	BAAQMD Condition # 10423, Parts 13f-h	Records of Landfill Gas Flow Rates, Collection and Control Systems Downtime, and Collection System Components	Periodic / Daily	BAAQMD Condition # 10423, Parts 5 and 6	Landfill gas collection system shall operate continuously and all collected gases shall be vented to a properly operating control system	Continuous	N/A
Collection and Control Systems Shutdown Time	BAAQMD 8-34-501.1	Operating Records	Periodic / Daily	BAAQMD 8-34-113.2	240 hours per year and 5 consecutive days	Continuous	N/A

NEWBY ISLAND LANDFILL

TITLE V SEMI-ANNUAL MONITORING REPORT

Site: Newby Island Landfill	**Facility ID#:** A9013
Permitted Unit: S-2 WASTE DECOMPOSITION PROCESS WITH GAS COLLECTION SYSTEM, A-2 AND A-3 LANDFILL GAS FLARE; S-5 WASTE AND COVER MATERIAL DUMPING; S-6 EXCAVATING, BULLDOZING, AND COMPACTING ACTIVITIES	**Reporting Period:** *from* 08/01/2024 *through* 01/31/2025

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
Periods of Inoperation for Parametric Monitors	BAAQMD 1-523.4	Operating Records for All Parametric Monitors	Periodic / Daily	BAAQMD 1-523.2	≤ 15 consecutive days per incident and ≤ 30 calendar days per 12-month period	Continuous	N/A
Continuous Monitors	40 CFR 60.7(b)	Operating Records for All Continuous Monitors	Periodic / Daily	40 CFR 60.13(e)	Requires Continuous Operation except for breakdowns, repairs, calibration, and required span adjustments	Continuous	N/A

NEWBY ISLAND LANDFILL

TITLE V SEMI-ANNUAL MONITORING REPORT

Site: Newby Island Landfill	**Facility ID#:** A9013
Permitted Unit: S-2 WASTE DECOMPOSITION PROCESS WITH GAS COLLECTION SYSTEM, A-2 AND A-3 LANDFILL GAS FLARE; S-5 WASTE AND COVER MATERIAL DUMPING; S-6 EXCAVATING, BULLDOZING, AND COMPACTING ACTIVITIES	**Reporting Period:** *from* 08/01/2024 *through* 01/31/2025

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
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 or collectors that are connected to the vacuum system)	Intermittent	The BAAQMD issued two Notices of Violation (NOV) during the reporting period for alleged positive pressure exceedances. • NOV Number A61898 issued on October 21, 2024 for seven (7) alleged pressure exceedances detected between May 9 and July 10, 2024. • NOV Number A61899 issued on November 18, 2024 for two (2) alleged pressure exceedances detected on November 6, 2024. In each instance, corrective actions were initiated and the wells were returned to negative pressure. The facility submitted 10- and 30-day Title V reports within the required timeframes, respectively.
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 ^{o}C (< 131 ^{o}F), except for components identified in Condition # 818, Part 3b(i)	Continuous	N/A

NEWBY ISLAND LANDFILL

TITLE V SEMI-ANNUAL MONITORING REPORT

Site: Newby Island Landfill	**Facility ID#:** A9013
Permitted Unit: S-2 WASTE DECOMPOSITION PROCESS WITH GAS COLLECTION SYSTEM, A-2 AND A-3 LANDFILL GAS FLARE; S-5 WASTE AND COVER MATERIAL DUMPING; S-6 EXCAVATING, BULLDOZING, AND COMPACTING ACTIVITIES	**Reporting Period:** *from* 08/01/2024 *through* 01/31/2025

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
Temperature of Gas at Wellheads	BAAQMD 8-34-414, 501.9, 505.2, and BAAQMD Condition 10423, part 6d(ii)	Monthly Inspection and Records	Periodic / Monthly	BAAQMD 8-34-305 and BAAQMD Condition 10423, part 6d(i)	<63 C (<145 F) (Alternative wellhead temperature limit that applies only to wells specified in BAAQMD Condition # 10423, Part 6d(i))	Continuous	N/A
Gas Concentration 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 or collectors that are connected to the vacuum system, except wells specified in BAAQMD Condition # 10423, Part 6c(i))	Continuous	N/A

NEWBY ISLAND LANDFILL

TITLE V SEMI-ANNUAL MONITORING REPORT

Site: Newby Island Landfill	**Facility ID#:** A9013
Permitted Unit: S-2 WASTE DECOMPOSITION PROCESS WITH GAS COLLECTION SYSTEM, A-2 AND A-3 LANDFILL GAS FLARE; S-5 WASTE AND COVER MATERIAL DUMPING; S-6 EXCAVATING, BULLDOZING, AND COMPACTING ACTIVITIES	**Reporting Period:** *from* 08/01/2024 *through* 01/31/2025

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
Gas Concentrations at Header	BAAQMD 8-34-414, 501.9, and 505.3 or 505.4, and BAAQMD Condition 10423 part 6c(ii)	Monthly Inspection and Records	Periodic / Monthly	BAAQMD 8-34-305 and BAAQMD Condition # 10423, Part 6c(i)	O2 < 15% (Alternative wellhead oxygen concentration limit that applies only to wells specified in BAAQMD Condition # 10423, Part 6c(i))	Continuous	N/A
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 replacement	Continuous	N/A

NEWBY ISLAND LANDFILL

TITLE V SEMI-ANNUAL MONITORING REPORT

Site: Newby Island Landfill	**Facility ID#:** A9013
Permitted Unit: S-2 WASTE DECOMPOSITION PROCESS WITH GAS COLLECTION SYSTEM, A-2 AND A-3 LANDFILL GAS FLARE; S-5 WASTE AND COVER MATERIAL DUMPING; S-6 EXCAVATING, BULLDOZING, AND COMPACTING ACTIVITIES	**Reporting Period:** *from* 08/01/2024 *through* 01/31/2025

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
TOC (Total Organic Com-pounds Plus Methane)	BAAQMD 8-34-501.6 and 503	Quarterly Inspection of collection and control system components with portable analyzer and Records	Periodic / Quarterly	BAAQMD 8-34-301.2	Component Leak Limit: < 1000 ppmv as methane	Intermittent	On November 18, 2024, the District issued NOV Number A61899 for alleged violations of BAAQMD Rule 8-24-301.2 due to the detection of seven (7) component leaks exceeding the methane limit of 1,000 parts per million by volume (ppmv) during a District inspection conducted on November 6, 2024. The facility initiated corrective actions and submitted 10- and 30-day Title V reports within the required timeframes, respectively.

NEWBY ISLAND LANDFILL

TITLE V SEMI-ANNUAL MONITORING REPORT

Site: Newby Island Landfill	**Facility ID#:** A9013
Permitted Unit: S-2 WASTE DECOMPOSITION PROCESS WITH GAS COLLECTION SYSTEM, A-2 AND A-3 LANDFILL GAS FLARE; S-5 WASTE AND COVER MATERIAL DUMPING; S-6 EXCAVATING, BULLDOZING, AND COMPACTING ACTIVITIES	**Reporting Period:** *from* 08/01/2024 *through* 01/31/2025

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
TOC	BAAQMD 8-34-415, 416, 501.6, 506 and 510	Monthly Visual Inspection of Cover, Quarterly Inspection of Surface with portable analyzer, Various Reinspection Times for Leaking Areas, and Records	Periodic / Monthly, Quarterly, and on an Event Basis	BAAQMD 8-34-303	Surface Leak Limit: < 500 ppmv as methane at 2 inches above surface	Intermittent	On November 18, 2024, the District issued NOV Number A61899 for alleged violations of BAAQMD Rule 8-34-303 due to the detection of thirty (30) surface leaks exceeding the methane limit of 500 ppmv during a District inspection conducted on November 6, 2024. The facility initiated corrective actions and submitted 10- and 30-day Title V reports within the required timelines, respectively. Additionally, the California Air Resources Board (CARB) issued a NOV on January 7, 2025 for thirty-nine (39) surface leaks exceeding 500 ppmv detected during its own inspection conducted on November 6, 2024.
Non-Methane Organic Com-pounds (NMOC)	BAAQMD 8-34-412 and 8-34-501.4 and BAAQMD Condition # 10423, Part 11b	Annual Source Tests and Records	Periodic / Annual	BAAQMD 8-34-301.3	> 98% removal by weight OR < 30 ppmv, dry basis @ 3% O2, expressed as methane (applies to flares only)	Continuous	N/A

NEWBY ISLAND LANDFILL

TITLE V SEMI-ANNUAL MONITORING REPORT

Site: Newby Island Landfill	**Facility ID#:** A9013
Permitted Unit: S-2 WASTE DECOMPOSITION PROCESS WITH GAS COLLECTION SYSTEM, A-2 AND A-3 LANDFILL GAS FLARE; S-5 WASTE AND COVER MATERIAL DUMPING; S-6 EXCAVATING, BULLDOZING, AND COMPACTING ACTIVITIES	**Reporting Period:** *from* 08/01/2024 *through* 01/31/2025

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)	BAAQMD 8-34-501.3 and 507, SIP 8-34-501.3 and BAAQMD Condition # 10423, Parts 11	Temperature Sensor and Recorder (continuous)	Continuous	BAAQMD Condition # 10423, Part 9	CT > 1525 °F, averaged over any 3-hour period (applies to A-1/A-3 only) CT > 1400 °F, averaged over any 3-hour period (applies to A-2 only)	Continuous	N/A
Total Carbon	BAAQMD Condition # 10423, Part 3	Records	Periodic / Daily	BAAQMD 8-2-301	< 15 pounds/day or < 300 ppm, dry basis (applies only to aeration of or use as cover soil of soil containing < 50 ppmw of volatile organic compounds)	Continuous	Based on records available for review at time of report submittal.
Amount of Contaminated Soil Aerated or Used as Cover	BAAQMD Condition # 10423, Part 2m	Records	Periodic / On Event Basis	BAAQMD 8-40-116.1 and BAAQMD Condition # 10423, Parts 2 and 3	< 1 cubic yard per project	Continuous	N/A

NEWBY ISLAND LANDFILL

TITLE V SEMI-ANNUAL MONITORING REPORT

Site: Newby Island Landfill	**Facility ID#:** A9013
Permitted Unit: S-2 WASTE DECOMPOSITION PROCESS WITH GAS COLLECTION SYSTEM, A-2 AND A-3 LANDFILL GAS FLARE; S-5 WASTE AND COVER MATERIAL DUMPING; S-6 EXCAVATING, BULLDOZING, AND COMPACTING ACTIVITIES	**Reporting Period:** *from* 08/01/2024 *through* 01/31/2025

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
Amount of Contaminated Soil Aerated or Used as Cover	BAAQMD 8-40-116.2 and BAAQMD Condition # 10423, Part 2m	Records	Periodic / On Event Basis	BAAQMD 8-40-116.2 and BAAQMD Condition #10423, Parts 2 and 3	< 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 Contaminated Soil Aerated or Used as Cover	BAAQMD Condition # 10423, Part 2m	Records	Periodic / On Event Basis	BAAQMD 8-40-301 and BAAQMD Condition #10423, Parts 2 and 3	Prohibited for Soil with Organic Content >50 ppmw unless exempt per BAAQMD 8-40-116, 117, or 118	Continuous	N/A
Amount of Accidental Spillage	None	N/A	None	BAAQMD 8-40-117 and BAAQMD Condition # 10423, Parts 2 and 3	Soil Contaminated by Accidental Spillage of < 5 Gallons of Liquid Organic Compounds	Continuous	N/A

NEWBY ISLAND LANDFILL

TITLE V SEMI-ANNUAL MONITORING REPORT

Site: Newby Island Landfill	**Facility ID#:** A9013
Permitted Unit: S-2 WASTE DECOMPOSITION PROCESS WITH GAS COLLECTION SYSTEM, A-2 AND A-3 LANDFILL GAS FLARE; S-5 WASTE AND COVER MATERIAL DUMPING; S-6 EXCAVATING, BULLDOZING, AND COMPACTING ACTIVITIES	**Reporting Period:** *from* 08/01/2024 *through* 01/31/2025

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 #10423, Part 2m	Records	Periodic / On Event Basis	BAAQMD 8-40-118 and BAAQMD Condition # 10423, Parts 2 and 3	< 150 pounds VOC per project and toxic air contaminant emissions per year < BAAQMD Table 2-1-316 limits	Continuous	N/A
Opacity	BAAQMD Condition # 10423, Part 13e	Records of all site watering and road cleaning events	Periodic / On event basis, Monthly	BAAQMD 6-1-301 and SIP 6-301	Ringelmann No. 1 for ≤ 3 minutes/hr (applies to S-1)	Continuous	N/A
Opacity	None	N/A	None	BAAQMD 6-1-301 and SIP 6-301	Ringelmann No. 1 for < 3 minutes/hr (applies to flares)	Continuous	N/A
TSP	None	N/A	None	BAAQMD 6-1-310.1 and SIP 6-310	< 0.15 grains/dscf (applies to flares only)	Continuous	N/A

NEWBY ISLAND LANDFILL

TITLE V SEMI-ANNUAL MONITORING REPORT

Site: Newby Island Landfill	**Facility ID#:** A9013
Permitted Unit: S-2 WASTE DECOMPOSITION PROCESS WITH GAS COLLECTION SYSTEM, A-2 AND A-3 LANDFILL GAS FLARE; S-5 WASTE AND COVER MATERIAL DUMPING; S-6 EXCAVATING, BULLDOZING, AND COMPACTING ACTIVITIES	**Reporting Period:** *from* 08/01/2024 *through* 01/31/2025

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
SO_2	None	N/A	None	BAAQMD 9-1-301	Property Line Ground Level Limits: < 0.5 ppm for 3 minutes and < 0.25 ppm for 60 min. and <0.05 ppm for 24 hours (applies to flares only)	Continuous	N/A
SO_2	BAAQMD Condition # 10423, Parts 10 and 13j	Sulfur analysis of landfill gas and Records	Periodic / Quarterly	BAAQMD Regulation 9-1-302	Exhaust Gas from Flare: < 300 ppm (dry basis) (applies to flares only)	Continuous	N/A
Total Sulfur Content in Landfill Gas	BAAQMD Condition # 10423, Parts 10a and 13j	Sulfur analysis of landfill gas	Periodic / Quarterly	BAAQMD Condition # 10423, Part 10a	< 1300 ppmv instantaneous concentration (expressed as H2S)	Continuous	N/A
Total Sulfur Content in Landfill Gas	BAAQMD Condition # 10423, Parts 10a and 13j	Sulfur analysis of landfill gas and Records	Periodic / Quarterly	BAAQMD Condition # 10423, Part 10a	< 300 ppmv annual average (expressed as H2S)	Continuous	N/A

NEWBY ISLAND LANDFILL

TITLE V SEMI-ANNUAL MONITORING REPORT

Site: Newby Island Landfill	**Facility ID#:** A9013
Permitted Unit: S-2 WASTE DECOMPOSITION PROCESS WITH GAS COLLECTION SYSTEM, A-2 AND A-3 LANDFILL GAS FLARE; S-5 WASTE AND COVER MATERIAL DUMPING; S-6 EXCAVATING, BULLDOZING, AND COMPACTING ACTIVITIES	**Reporting Period:** *from* 08/01/2024 *through* 01/31/2025

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
NOx	BAAQMD Condition 10423, Part 11d	Annual Source Test & Records	Periodic / Annual	BAAQMD Condition # 10423, Part 10b	Applies to Exhaust Gas from Flares: < 60 ppm corrected to 15% oxygen, dry basis (< 0.05 pounds NOx per million BTU LFG)	Continuous	N/A
H_2S	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
Amount of Waste Accepted	BAAQMD Condition # 10423, Part 13a	Records	Periodic / Daily	BAAQMD Condition # 10423, Part 1	4,000 tons/day and < 39,000,000 tons (predicted cumulative amount of all wastes) and < 50,800,000 yd3 (cumulative amount of all wastes and cover materials)	Continuous	N/A

NEWBY ISLAND LANDFILL

TITLE V SEMI-ANNUAL MONITORING REPORT

Site: Newby Island Landfill	**Facility ID#:** A9013
Permitted Unit: S-2 WASTE DECOMPOSITION PROCESS WITH GAS COLLECTION SYSTEM, A-2 AND A-3 LANDFILL GAS FLARE; S-5 WASTE AND COVER MATERIAL DUMPING; S-6 EXCAVATING, BULLDOZING, AND COMPACTING ACTIVITIES	**Reporting Period:** *from* 08/01/2024 *through* 01/31/2025

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
Heat Input A-1/A-3	BAAQMD Condition # 10423, Parts 8 and 13h	Records	Periodic / Daily	BAAQMD Condition # 10423, Part 8	< 2,006 MM BTU per day and < 732,095 MM BTU per year	Continuous	N/A
Heat Input, A-2	BAAQMD Condition # 10423, Parts 8 and 13h	Records	Periodic / Daily	BAAQMD Condition # 10423, Part 8	< 1,800 MM BTU per day and < 657,000 MM BTU per year	Continuous	N/A

NEWBY ISLAND LANDFILL

TITLE V SEMI-ANNUAL MONITORING REPORT

Site: Newby Island Landfill	**Facility ID#:** A9013
Permitted Unit: S-3 COMPOSTING OPERATION; A-3 WATER TRUCK	**Reporting Period:** *from* 08/01/2024 *through* 01/31/2025

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
Opacity	BAAQMD Condition # 8178, Parts 3 and 4	Observation of Operations and Records	Periodic / On Event Basis	BAAQMD Regulation 6-1-301 and SIP 6-301	< Ringelmann 1.0 for 3 minutes in any hour	Continuous	N/A
Opacity	BAAQMD Condition # 8178, Parts 3 and 4	Observation of Operations and Records	Periodic / On Event Basis	BAAQMD Condition # 8178, Part 3	< Ringelmann 1.0	Continuous	N/A

NEWBY ISLAND LANDFILL

TITLE V SEMI-ANNUAL MONITORING REPORT

Site: Newby Island Landfill	**Facility ID#:** A9013
Permitted Unit: S-4 NON-RETAIL GASOLINE DISPENSING FACILITY	**Reporting Period:** *from* 08/01/2024 *through* 01/31/2025

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
Gasoline Throughput	BAAQMD 8-7-503.1	Records	Periodic / Annual	BAAQMD Condition # 14098	940,000 gallons per 12-month period	Continuous	N/A
Throughput (exempt from Phase I)	BAAQMD 8-7-501 and 8-7-503.2	Records	Periodic / On event basis	BAAQMD 8-7-114	1000 gallons per facility for tank integrity leak checking	Continuous	N/A
Organic Compounds	None	N/A	None	SIP 8-5-303.2	Tank Pressure Vacuum Valve Shall Be: Gas Tight or < 500 ppmv (expressed as methane) above background for PRVs (as defined in SIP 8-5-206)	Continuous	N/A
Organic Compounds	None	Equipment must be precertified by CARB	None	BAAQMD 8-7-301.2	All Phase I Systems Shall Meet the Emission Limitations of the Applicable CARB Certification	Continuous	N/A
Organic Compounds	CARB EO G-70-148-A paragraph 21	Annual Check for Vapor Tightness and Proper Operation of Vapor Recovery	Periodic / Annual	BAAQMD 8-7-301.6	All Phase I Equipment (except components with allowable leak rates) shall be leak free (<3 drops/minute) and vapor tight	Continuous	N/A

NEWBY ISLAND LANDFILL

TITLE V SEMI-ANNUAL MONITORING REPORT

Site: Newby Island Landfill	**Facility ID#:** A9013
Permitted Unit: S-4 NON-RETAIL GASOLINE DISPENSING FACILITY	**Reporting Period:** *from* 08/01/2024 *through* 01/31/2025

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
		System					
Organic Compounds	CARB EO G-70-148-A paragraph 21	Annual Check for Vapor Tightness and Proper Operation of Vapor Recovery System	Periodic / Annual	BAAQMD 8-7-302.5	All Phase II Equipment (except components with allowable leak rates or at the nozzle/fill-pipe interface) Shall Be: leak free (<3 drops/minute) and vapor tight	Continuous	N/A
Organic Compounds	CARB EO G-70-148-A paragraph 21	Annual Check for Vapor Tightness and Proper Operation of Vapor Recovery System	Periodic / Annual	CARB EO G-70-148-A paragraph 10	Any Emergency Vent or Manway Shall Be: leak free	Continuous	N/A
Defective Component Repair/ Replacement Time Limit	BAAQMD 8-7-503.2	Records	Periodic / On Event Basis	BAAQMD 8-7-302.4	< 7 days	Continuous	N/A
Liquid Removal Rate	CARB EO G-70-52-AM	CARB Certification Procedures	Periodic / On Event Basis	BAAQMD 8-7-302.8	> 5 ml per gallon dispensed, when dispensing rate	Continuous	N/A

NEWBY ISLAND LANDFILL

TITLE V SEMI-ANNUAL MONITORING REPORT

Site: Newby Island Landfill	**Facility ID#:** A9013
Permitted Unit: S-4 NON-RETAIL GASOLINE DISPENSING FACILITY	**Reporting Period:** *from* 08/01/2024 *through* 01/31/2025

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
					> 5 gallons/minute		
Liquid Retain from Nozzles	CARB EO G-70-52-AM	CARB Certification Procedures	Periodic / On Event Basis	BAAQMD 8-7-302.12	< 100 ml per 1000 gallons dispensed	Continuous	N/A
Nozzle Spitting	CARB EO G-70-52-AM	CARB Certification Procedures	Periodic / On Event Basis	BAAQMD 8-7-302.13	< 1.0 ml per nozzle per test	Continuous	N/A
Pressure-Vacuum Valve Settings	CARB EO G-70-148-A	CARB Certification Procedures	Periodic / On Event Basis	BAAQMD 8-7-316 and CARB EO G-70-148-A, paragraph 14	Pressure Setting: > 2.5 inches of water, gauge	Continuous	N/A
Pressure-Vacuum Valve Settings	None	N/A	None	SIP 8-5-303.1	Pressure Setting: > 10% of maximum working pressure or > 0.5 psig	Continuous	N/A
Disconnection Liquid Leaks	CARB EO G-70-148-A paragraph 21	Annual Check for Vapor Tightness and Proper Operation of Vapor Recovery System	Periodic / Annual	CARB EO G-70-148-A paragraph 12	10 ml per disconnect, averaged over 3 disconnect operations	Continuous	N/A

NEWBY ISLAND LANDFILL

TITLE V SEMI-ANNUAL MONITORING REPORT

Site: Newby Island Landfill	**Facility ID#:** A9013
Permitted Unit: S-8 HORIZONTAL GRINDER OPERATIONS/ S-9 TROMMEL SCREEN/OPERATIONS	**Reporting Period:** *from* 08/01/2024 *through* 01/31/2025

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
Opacity	None	N/A	None	BAAQMD 6-1-301 and SIP 6-301	Ringelmann 1.0 for <3 minutes in any hour	Continuous	N/A
Particulate Matter (PM)	None	N/A	None	BAAQMD 6-1-311 And SIP 6-311	$E = 0.026(P)^{0.67}$ where: E = Allowable Emission Rate (lb/hr); and P = Process Weight Rate (lb/hr) Maximum Allowable Emission Rate = 40 lb/hr For P >57,320 lb/hr (or P > 28.66 tons/hr)	Continuous	N/A