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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 375 Beale Street, Suite 600 San Francisco, CA 94105



01205162.04 Task 7 | February 2025

4683 Chabot Drive, Suite 200 Pleasanton, CA 94588 562-426-9544 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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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 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:

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)

Table 1. Reporting Requirements, Corresponding Regulatory References

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 remonitoring 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, IOIR, 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 202	4.	
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 DowntimeNewby 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
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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 Snutdown 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 14:30	9/27/2024 15:00	0.40	Low Gds Flow, preventative/parametric shutdown (113)
9/30/2024 14:30	9/30/2024 10:02	0.27	Low Gas Elow proventative (narametric shutdown (112)
10/1/2024 12:38	10/1/2024 10:40	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 DowntimeNewby 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		1.13	Air Compressor Maintenance (113)
То	tal	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 DecommissionsNewby 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 ₂ O)	Adjusted Static Pressure ("H ₂ O)	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	Corrective Action	Adjusted O2 [%]	15-Day Follow-Up	Comments		
			Action Date			Date			
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 Inrigue Perez Signature of Responsible Official

02/24/2025

Date

Enrique Perez

Name of Responsible Official

Appendix B – Existing GCCS Layout



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	EW	EXISTING DUA	L CASING WELL		 	<u> </u>			
	A	EXISTING REM	10TE WELLHEAD		DATE				
	*	EXISTING HOF	RIZONTAL MANIFOLD					+	+
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	♦cs	EXISTING CON	IDENSATE SUMP						
	8	EXISTING SAM	1PLE PORT		z				
		EXISTING ROA	AD CROSSING		EVISIC				
		EXISTING ISOI	LATION VALVE		Ľ				
	\triangleleft	EXISTING RED	UCER FITTING						
	11	EXISTING BLIN	ID FLANGE						
	30"	EXISTING 30" L	-FG COLLECTION HEADER PI	IPING					
	24"	EXISTING 24" L	-FG COLLECTION HEADER PI	IPING					
	18"	EXISTING 18" L	-FG COLLECTION HEADER PI	IPING	NO.	$\triangleleft \triangleleft$			
	16"	EXISTING 16" L	-FG COLLECTION HEADER PI	IPING					
	12"	EXISTING 12" L	-FG COLLECTION HEADER PI	IPING					
	10"	EXISTING 10" L	-FG COLLECTION LATERAL P	PING	CCS PLAN		=		
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S ENGINEERS INMENTAL CONSULTANTS AVENUE SUITE 290 S SOC ENVIR SAN DIEGO, SAN DIEGO, DATE: 01/24/2025 SCALE: AS SHOWN SHEET:

Appendix C – Surface Emission and GCCS Component Leak Monitoring Results
SCS FIELD SERVICES

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

Encl.

Sean Bass

Sean T. Bass Senior Project Manager SCS Field Services

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 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



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Attachment 2

Surface Pathway



Third Quarter 2024 LMR Surface Emissions Monitoring Pathway



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

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179* 160 481 182 183 W/62* 184 185 186 187 188 189 190 181 192 193 W/29* 194 195 196 197 196 197 196 197 196 197 188 199 200 201 202 203 204 205 206 207 208 209 199 200 201 202 203 204 205 206 207 208 209 199 200 211 192 213 212 223 214 200 217 218 MANEOLD 210 220 223 222 223 223 224 225 228 227 190 217 218 STATION 2 223 223 223 223 223 234 235 238 237 190 100 // 288 238 239 240 241 242 243 244 243 244 244 244 <t< td=""><td>169</td><td>170 PW-00 **</td><td>171 BC 0 0</td><td>SARD-172 BH-55</td><td>173</td><td>174</td><td>Wa12</td><td>WEEE 176</td><td>177 EW-704</td><td>178</td><td></td></t<>	169	170 PW-00 **	171 BC 0 0	SARD-172 BH-55	173	174	Wa12	WEEE 176	177 EW-704	178	
139 190 181 192 193 W709 195 196 197 9765 97 199 200 201 202 203 193 W709 206 207 208 209 199 200 211 202 203 193 213 214 205 206 207 208 209 199 200 211 W1514 213 214 200 215 216 W467 217 218 199 200 228 229 230 645 199 224 224 225 225 225 227 1000 100	179	180 AND AND	ER 151 481	182 187 EN 68	183	184	185	186	187 BIL	188	Anwaz T
199 200 201 202 203 204 205 206 207 208 209 STATION 211 W514 213 213 214 CW003 215 216 W407 217 218 MANFOLD-7 219 220 224 222 223 224 225 225 226 227 WW034 (P)(R) STATION 2 223 229 230 645 (PS)® Wr07 ° 232 233 234 235 236 237 STATION 2 228 239 246 241 241 244 243 244 244 Opocile Earth 245 246 247 MANFOLD 2 248 249 249	189	190	191 - 191	192 . EN-65	* 193	W793 ¹⁹⁴	195	196 LEN	197 JEN	9755 (P)	
Contraction Cont	199 200	201 WW@40	202	203 DEW 7	204	205	206	207	208	209	the first and
MANIFOLD-7 219 220 223 222 223 224 225	STATION 1	210	201	90514	0 EW 213 8817-5	A 907294	215	216	W457 217	218	MANIFOLD-18
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oogle Earth 245 246 246 247 MARTOD 2 248 249		238	239	240 907/35	241	MANIF	OLDAT CAL	242	243	244	
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Initial Emissions Monitoring Locations Greater Than 200 and 500 ppmv Newby Island Landfill Milpitas, California

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

Table 1. LMR Instantaneous Surface and Component Emissions Monitoring Results

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

Table 1. LMR Instantaneous Surface and Component Emissions Monitoring Results

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

Table 1. LMR Instantaneous Surface and Component Emissions Monitoring Results

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

Table 1. LMR Instantaneous Surface and Component Emissions Monitoring Results

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

Table 1. LMR Instantaneous Surface and Component Emissions Monitoring Results

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

Table 1. LMR Instantaneous Surface and Component Emissions Monitoring Results

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

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

Point Name	Record Date	FID Concentration	Comments
NUL-001	9/26/2024	(ppm)	
NIL-001	9/26/2024	2.38	
NIL-002	9/20/2024	2.40	
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
NUL-020	10/11/2024	52 27	Second 10-Day Recheck
NIL-020	10/11/2024	55.27	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

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Point Name	Record Date	FID Concentration	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
NII -033	10/11/2024	44 73	Second 10-Day Recheck
NIE-055	10/11/2024	44.75	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
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
NII -042	0/25/2024	44.22	Expansion due by January 22, 2025
NIL-042	10/2/2024	44.52	First 10 Day Poshock
NIL-042	10/3/2024	01.20	Second 10-Day Recheck
NIL-042	10/11/2024	41.89	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
NII -045	9/26/2024	100.19	Initial Monitoring
NII -045	10/3/2024	108.85	First 10-Day Recheck
	10/0/2021	10.00	Second 10-Day Recheck
NIL-045	10/11/2024	40.02	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



Point Name	Record Date	FID Concentration (ppm)	Comments
NIL-050	10/11/2024	50.06	Second 10-Day Recheck
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
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

SCS DataServices - Secure Environmental Data

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



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
NII 424			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
NII -142			Expansion due by January 22, 2025
NII -1/2			Active/Exempt Grid Area
NII -1 <i>11</i>			Active/Exempt Grid Area
NIL-144	Q/22/2024	12.02	
1112-140	5/25/2024	12.02	



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



Point Name	Record Date	FID Concentration	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	

SCS DataServices - Secure Environmental Data



Point Name	Record Date	FID Concentration	Comments
NII -215		(ppm) 	Active/Exempt Grid Area
NIL-216	9/23/2024	13 35	
NIL-217	9/22/2024	18.20	
NIL-217	9/23/2024	12.72	
NIL-210	9/23/2024	13.72	
NIL-219	9/23/2024	8.34	Antina (Europet Crist Area
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	



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 EMISS	SIONS MONI	TORING	
		CALIBRATION AN	ND PERTINE	NT DATA	
Date:	9-29.24		Site Name	New D-1	
	AD1.	N			
mspecior(2)	J. Legeli	18	instrument:	TVA 2020	
WEATHER OBS	SERVATIONS				
Wind Speed	2МРН	Wind Direction: NE		Barometric Pressure: 29.32	Hg
Air Temperature:	<u>56</u> *F	General Weathe Condition	s: Mostly Sc	uny	
CALIBRATION I	NFORMATION				
Pre-monitoring (Calibration Precision Check				
Procedure Calibi and calculate the orecision must be nstrument Serial	rate the instrument Make e average algebraic differen e less than or equal to 10% Number: J22	a total of three measuremence between the instrument of the calibration gas value.	nts by alternating reading and the o	a zero air and the calibrati calibration gas as a percer Cal Gas Concentration:	on gas. Record the reading atage. The calibration 5000000
trial [Cal Cas Basking			
1	-O. 1	SU2	I Cal Gas C	oncCal Gas Reading	Response Time (second
2	- O.1	501	$\overline{1}$		7
3	0	5757	C)	6
libration Precisio	on= Average Difference/Ca	Average Difference:	*Perform recalibration	>]
libration Precisio	on= Average Difference/Ca	Average Difference: I Gas Conc. X 100% = 100%- = ;	*Perform recalibration	> if average difference is greater than /500 x 100%]
alibration Precision	on= Average Difference/Ca	Average Difference: I Gas Conc. X 100% = 100%- =	*Perform recalibration) if average difference is greater than /500 x 100%]
an Sensitivity:	on= Average Difference/Ca its Observed for the Span=	Average Difference: I Gas Conc. X 100% = 100%- = 1 147672	*Perform recalibration	> If average difference is greater than /500 × 100% :s Observed for the Span=	148748
libration Precision an Sensitivity: al 1: Counte	on= Average Difference/Ca its Observed for the Span= ers Observed for the Zero=	Average Difference: I Gas Conc. X 100% = 100%- = 1 147672 3758	*Perform recalibration *Perform recalibration % Trial 3: Counter Counter	> if average difference is greater than /500 x 100% :s Observed for the Span= rs Observed for the Zero=	148748 3728
alibration Precision an Sensitivity: al 1: Count Counte 11 2: Count	on= Average Difference/Ca its Observed for the Span= ers Observed for the Zero= ts Observed for the Span=	Average Difference: I Gas Conc. X 100% = 100%- = $100\%-$ = 1	*Perform recalibration % Trial 3: Counter	> If average difference is greater than /500 × 100% Is Observed for the Span= rs Observed for the Zero=] 10 148748 3728
alibration Precision an Sensitivity: al 1: Counter 12: Counter Counter	on= Average Difference/Ca its Observed for the Span= ers Observed for the Zero= ts Observed for the Span= rs Observed for the Zero=	Average Difference: I Gas Conc. X 100% = 100%- = $100\%-$ = 1	*Perform recalibration * Perform recalibration % Trial 3: Counter Counter	> If average difference is greater than /500 x 100% Is Observed for the Span= rs Observed for the Zero=] 10 148748 3728
alibration Precision an Sensitivity: al 1: Counter 12: Counter Counter : Monitoring Cali	on= Average Difference/Ca its Observed for the Span= ers Observed for the Zero= ts Observed for the Span= rs Observed for the Zero= ibration Check	Average Difference: I Gas Conc. X 100% = 100% = 1	*Perform recalibration	> if average difference is greater than /500 x 100% is Observed for the Span= rs Observed for the Zero=] 148748 3728
alibration Precision an Sensitivity: al 1: Counte la 2: Counte la 2: Counte i Air Jing:	on= Average Difference/Ca its Observed for the Span= ers Observed for the Zero= ts Observed for the Span= rs Observed for the Zero= ibration Check	Average Difference: I Gas Conc. X 100% = 100%- = 1 107672 3758 149740 3758 149740 3704 Cal Gas Reading:	Perform recalibration	> If average difference is greater than /500 x 100% Is Observed for the Span= rs Observed for the Zero=	148748 3728
alibration Precision an Sensitivity: al 1: Counter Counter Counter t Monitoring Cali Air ding: KGROUND COM	on= Average Difference/Ca its Observed for the Span= ers Observed for the Zero= ts Observed for the Span= rs Observed for the Zero= ibration Check 2ppm INCENTRATIONS CHECKS	Average Difference: I Gas Conc. X 100% = 100%- = 1 100%- = 1 100%- = 1 100%- = 1 100%- = 1 100%- = 1 100%- = 1 Cal Gas Reading:	*Perform recalibration % Trial 3: Counter Counter	> if average difference is greater than /500 × 100% is Observed for the Span= rs Observed for the Zero= pm] 148748 3728
alibration Precision an Sensitivity: al 1: Counter Counter Counter t Monitoring Cali Air ding: KGROUND COR ind Location Des	on= Average Difference/Ca its Observed for the Span= ers Observed for the Zero= ts Observed for the Zero= ibration Check 2ppm NCENTRATIONS CHECKS scription:	Average Difference: I Gas Conc. X 100% = 100%- = 1 107672 3758 149740 3758 149740 3704 Cal Gas Reading:	*Perform recalibration % Trial 3: Counter Counter	if average difference is greater than /500 x 100% is Observed for the Span= rs Observed for the Zero= pm eading: 2.1	148748 3728
alibration Precision an Sensitivity: al 1: Counter Counter Counter Counter Counter Counter Counter Air ding: KGROUND COR ind Location Des wind Location D	on= Average Difference/Ca its Observed for the Span= ers Observed for the Zero= ts Observed for the Span= rs Observed for the Zero= ibration Check 2ppm NCENTRATIONS CHECKS scription: Description:	Average Difference: Average Difference: I Gas Conc. X 100% = 100%- = 1 10%- = 1 10%- = 1 10%- = 1 10%- = 1 20%- = 1 20%- = 1 20%- = 1 20%- = 1 20%- = 100%- = 10	*Perform recalibration *Perform recalibration % Trial 3: Counter Counter Re Re	om	148748 3728 3728

	SURFACE EMIS	SIONS MONI	TORING	
0	CALIBRATION A	ND PERTINE	NT DATA	
Date:	24	Site Name:	Newby	
Inspector(s):	abson	Instrument	TVA 2020	
WEATHER OBSERVATIONS			-	
Wind Speed: MPH	Wind Direction:		Barometric Pressure: 24.82	3 "нg
Air 56 Temperature:°F	General Weath Conditior	s Svenz	-	
CALIBRATION INFORMATION				
Pre-monitoring Calibration Precision Che	ck			
and calculate the average algebraic diffe precision must be less than or equal to 10 Instrument Serial Number:	orence between the instrument % of the calibration gas value	reading and the c	calibration gas as a percei Cal Gas Concentration:	ntage. The calibration
Trial Zero Air Reading	Cal Gas Reading	Cal Gas Co	oncCal Gas Reading	Response Time (secon
$\begin{array}{c c} 1 & -0. \end{array}$	500	0		74
3 -0.(500	0		7
alibration Precision= Average Difference/	Cal Gas Conc. X 100%	*Perform recalibration i	f average difference is greater than	10
	ુ વવ. જે	%	200 X 100%	
an Sensitivity:		Total 2		
Counts Observed for the Spa	1412 88	Counts	Observed for the Span=	142743
Counters Observed for the Zero	5305	Counter	s Observed for the Zero=	5277
al Z: Counts Observed for the Spar	= 1412362			
Counters Observed for the Zerc	- 5298			
t Monitoring Calibration Check				
o Air	Cal Gas			
ding:	Reading	<u>494</u> pp	m	
KGROUND CONCENTRATIONS CHECK	s.			
ind Location Description:	-	Rea	ading: 2.7	mqc
nwind Location Description:	grid	Rea	ading: 372 p	mq¢
Wind speed averages were of exceeded 20 miles per hour. meteorological conditions w	bserved to remain below the No rainfall had occurred with ere within the requested alter	alternative reques in the previous 24	ted 10 miles per hour an hours of the monitoring	d no instantaneous speeds event. Therefore, site
10 Scalet Carlo - Sales a	ar vilico familiativil 1			

STER BASSIE REALIZED IN SALESSAR BUT VIELS SALESSAR DESSAR - PART

		CALIBRATION A	ND PERTINE	IUKING NT DATA	
Date	9-23-24		Site Name:	Newby	
Inspector(s)	Andrew S.	tono.	Instrument:	TVA 2020	
WEATHER OB	SERVATIONS).	
Wind Speed	:МРН	Wind Direction:		Barometric Pressure: <u>29-8</u>	<u>38</u> "нg
Air Temperature:	56 F	General Weath Condition	ns: 29.88		
CALIBRATION I	NFORMATION				
Pre-monitoring (Calibration Precision Chec	k			
nstrument Serial	Number: $(2)^{1}$	6 of the calibration gas value	, reauing and the c	Cal Gas Concentration	ntage. The collibration
rial 1	Zero Air Reading	Cal Gas Reading	Cal Gas Co	oncCal Gas Reading	Response Time (secon
2	-0.1	500	0		7
					1 +
libration Precisio	on= Average Difference/C	Average Difference: al Gas Conc. X 100%	Perform recalibration i	if average difference is greater tha	n 10
libration Precisio	on= Average Difference/C	Average Difference: al Gas Conc. X 100% = 100%- = 1000	Perform recalibration i	if average difference is greater tha /500 x 100%	n 10
libration Precisio	on= Average Difference/C	Average Difference: al Gas Conc. X 100% = 100%- = (00)	Perform recalibration i	if average difference is greater tha /500 x 100%	n 10
libration Precision In Sensitivity: In 11: Count	on= Average Difference/C	Average Difference: al Gas Conc. X 100% = 100%- = (00) =	*Perform recalibration i *Perform recalibration i % % <u>Trial 3:</u> Count:	if average difference is greater tha /500 x 100% s Observed for the Span=	- 149118
libration Precision In Sensitivity: al 1: Counter Counter	on= Average Difference/C ts Observed for the Spaners Observed for the Zeroe	Average Difference: al Gas Conc. X 100% = 100%- = (00) = 148016 	Perform recalibration i Perform recalibration i	if average difference is greater tha /500 x 100% s Observed for the Span= s Observed for the Zero=	- 10 - 10 - <u>149118</u> - 3692
libration Precision In Sensitivity: Il 1: Counter Counter I 2: Count	on= Average Difference/C ts Observed for the Span= rs Observed for the Zero= s Observed for the Span=	Average Difference: al Gas Conc. X 100% = 100%- = (00) = 148016 	Perform recalibration i Perform recalibration i % % <u>Trial 3:</u> Counter:	if average difference is greater tha /500 x 100% s Observed for the Span= s Observed for the Zero=	149118 3692
libration Precision In Sensitivity: al 1: Counter Counter Counter Counter	on= Average Difference/C ts Observed for the Span= rs Observed for the Zero= s Observed for the Span= s Observed for the Zero=	Average Difference: al Gas Conc. X 100% = 100%- = (00) = 148016 = 3077-3744 148434 = 377-14	Perform recallibration i Perform recallibration i % <u>Trial 3:</u> Counter:	if average difference is greater tha /500 x 100% s Observed for the Span= s Observed for the Zero=	- 10 - 149118 - 3692
libration Precision In Sensitivity: al 1: Counter L2: Counter Monitoring Calib	on= Average Difference/C ts Observed for the Span= rs Observed for the Zero= s Observed for the Span= s Observed for the Zero= pration Check	Average Difference: al Gas Conc. X 100% = 100%- = (00) = 148016 = 3000 - 377-3744 148434 - 377-14	*Perform recalibration i *Perform recalibration i % % <u>Trial 3:</u> Counter:	if average difference is greater tha /500 x 100% s Observed for the Span= s Observed for the Zero=	149118 3692
libration Precision In Sensitivity: Il 1: Counter Counter Counter Monitoring Calit Air	on= Average Difference/C ts Observed for the Span= rs Observed for the Zero= s Observed for the Span= s Observed for the Zero= pration Check	Average Difference: al Gas Conc. X 100% = 100%- = (00) = 148016 = 3037-3744 148434 = 3744 3744 3744 Cal Gas	Perform recalibration i Perform recalibration i % Trial 3: Counter: Counter:	if average difference is greater tha /500 x 100% s Observed for the Span= s Observed for the Zero=	149118 3692
libration Precision In Sensitivity: Il 1: Counter I 2: Counter Monitoring Calit Air ing:	on= Average Difference/C ts Observed for the Span= rs Observed for the Zero= s Observed for the Span= s Observed for the Zero= oration Check	Average Difference: al Gas Conc. X 100% = 100%- = (00) = 148016 = 3077-3744 148434 = 377-4 148434 = 377-4	Perform recallibration i Perform recallibration i % Trial 3: Counter: Counter: UGG pp	if average difference is greater tha /500 x 100% s Observed for the Span= s Observed for the Zero=	- 149118 3692
libration Precision In Sensitivity: al 1: Counter Counter Counter Monitoring Calit Air ing:	on= Average Difference/C ts Observed for the Span= rs Observed for the Zero= s Observed for the Span= <u>s Observed for the Zero=</u> pration Check <u>6</u> ppm CENTRATIONS CHECKS	Average Difference: al Gas Conc. X 100% = (00) = 148016 = 3007-3744 148434 37-14 Cal Gas Reading:	Perform recallibration i Perform recallibration i	if average difference is greater tha /500 x 100% s Observed for the Span= s Observed for the Zero=	- 10 - 149118 - 3692
libration Precision In Sensitivity: I 1: Counter Counter Counter Monitoring Calif Air ing: Count Counter Monitoring Calif Air ing: Count Counter Monitoring Calif Air ing: Count Counter Coun	on= Average Difference/C ts Observed for the Span= rs Observed for the Zero= s Observed for the Zero= oration Check CENTRATIONS CHECKS	Average Difference: al Gas Conc. X 100% = 100%- = (00) = 148016 = 3007-3744 148434 377-14 Cal Gas Reading:	Perform recalibration i Perform recalibration i % Trial 3: Counter: Counter: Pp	if average difference is greater tha /500 x 100% s Observed for the Span= s Observed for the Zero=	ррт
libration Precision In Sensitivity: Il 1: Counter Counter Counter Monitoring Calif Air ing: Count Counter Monitoring Calif Air ing: Count Counter Monitoring Calif Air ing: Count Counter Cou	on= Average Difference/C ts Observed for the Span= rs Observed for the Zero= s Observed for the Span= s Observed for the Zero= oration Check CENTRATIONS CHECKS cription:	Average Difference: al Gas Conc. X 100% = 100%- = (00) = 148016 = 3007-3744 148434 377-4 148434 377-4 Cal Gas Reading: = f grid	Perform recalibration i Perform recalibration i % Trial 3: Counter: Counter: Rea Rea	if average difference is greater tha /500 x 100% s Observed for the Span= s Observed for the Zero= m ading: 2.7 ading: 3.2	ррт орт

1		CALIBRATION AN	D PERTINENT O	ATA	
	01.24.25	1/		Alas 1 e	
Date	ADGIGG	Delandillo	Site Name:	verof	
Inspector(s):	AUrran	Deigoattio	Instrument:	/A 2020	
WEATHER C	BSERVATIONS				
Wind Spe	ed:MPH	Wind Direction:	Ba	rometric Pressure: 29.77	7 "Hg
Temperatu	Air re: <u>62</u> *F	General Weathe Conditions	Mostlys	mny	
CALIBRATIO	N INFORMATION				
Pre-monitorin	g Calibration Precision Check				
and calculate i precision must nstrument Ser	the average algebraic differe be less than or equal to 10% ial Number:	nce between the instrument of the calibration gas value.	reading and the calibro Cal	ition gas as a percent Gas Concentration	age. The colibration
rial	Zero Air Reading	Cal Gas Reading	Cal Gas ConcC	al Gas Reading]	Response Time (seconds)
1	-0.1	502	2		3
2	0	507	[5
libration Prec	ision= Average Difference/Ca	al Gas Conc. X 100%			
libration Prec	ision= Average Difference/Ca	al Gas Conc. X 100% = 100%	/500	< 100%	
libration Prec	ision= Average Difference/Ca	al Gas Conc. X 100% = 100%- = 99.74	<u>,</u> %	< 100%	5
libration Prec	ision= Average Difference/Ca	al Gas Conc. X 100% = 100%- = 99.74	/500 ; %	< 100%	
libration Prec an Sensitivity: al 1: Co	ision= Average Difference/Ca unts Observed for the Span=	= 100% $= 99.74$ $100%$	/500 ; % T <u>rial 3:</u> Counts Obs	< 100% erved for the Span=	146100
libration Prec an Sensitivity: al 1: Co Cour	ision= Average Difference/Ca unts Observed for the Span= nters Observed for the Zero=	= 100% $= 99.24$ $= 16.18776$ $= 4032$	/500 x % Trial 3: Counts Obs Counters Obs	< 100% erved for the Span= erved for the Zero=	146100 3875
libration Prec an Sensitivity: al 1: Co <u>Cour</u> l 2: Co	ision= Average Difference/Ca unts Observed for the Span= nters Observed for the Zero= unts Observed for the Span=	= 100% $= 99.74$ 148776 4032 147772	/500 x % Trial 3: Counts Obs Counters Obs	< 100% erved for the Span= erved for the Zero=	146100 3875
libration Prec an Sensitivity: al 1: Cour <u>l 2:</u> Cour Cour	ision= Average Difference/Ca unts Observed for the Span= nters Observed for the Zero= unts Observed for the Span= iters Observed for the Zero=	$= 100\%$ $= 99.74$ $\frac{148776}{1032}$ $\frac{147772}{3952}$	/500 : % Trial 3: Counts Obs Counters Obs	< 100% erved for the Span= erved for the Zero=	146100 3875
libration Prec an Sensitivity: al 1: Cour <u>l 2:</u> Cour Monitoring C	ision= Average Difference/Ca unts Observed for the Span= nters Observed for the Zero= unts Observed for the Span= nters Observed for the Zero= Calibration Check	$= 100\%$ $= 99.74$ $\frac{148776}{1032}$ $\frac{147772}{3952}$	/500 : % Trial 3: Counts Obs Counters Obs	< 100% erved for the Span= erved for the Zero=	146100 3875
libration Prec an Sensitivity: al 1: Cour Cour Monitoring C Air	ision= Average Difference/Ca unts Observed for the Span= nters Observed for the Zero= unts Observed for the Span= nters Observed for the Zero= Calibration Check	$= 100\%$ $= 99.74$ $\frac{148776}{147772}$ $\frac{147772}{3952}$ Cal Gas	7500 : % Trial 3: Counts Obs Counters Obs	< 100% erved for the Span= erved for the Zero=	146100 3875
libration Prec an Sensitivity: al 1: Court Court Court Monitoring C Air ling:	ision= Average Difference/Ca unts Observed for the Span= nters Observed for the Zero= unts Observed for the Span= nters Observed for the Zero= Calibration Check	$= 100\%$ $= 99.74$ $\frac{148776}{1032}$ $\frac{147772}{3952}$ Cal Gas Reading:	7500 : % Trial 3: Counts Obs Counters Obs	< 100% erved for the Span= erved for the Zero=	146100 3875
libration Prec an Sensitivity: al 1: Court Court Court Monitoring C Air Ling:	ision= Average Difference/Ca unts Observed for the Span= nters Observed for the Zero= unts Observed for the Span= nters Observed for the Zero= Calibration Check OCENTRATIONS CHECKS	$= 100\%$ $= 99.74$ $\frac{148776}{1032}$ $\frac{147772}{3952}$ Cal Gas Reading:	7500 : % Trial 3: Counts Obs Counters Obs	< 100% erved for the Span= erved for the Zero=	146100 3875
libration Prec an Sensitivity: al 1: Co Cour Nonitoring C Air ling: KGROUND C nd Location E	ision= Average Difference/Ca unts Observed for the Span= <u>nters Observed for the Zero=</u> unts Observed for the Span= <u>iters Observed for the Zero=</u> Calibration Check Calibration Check Description:	$= 100\%$ $= 99.74$ $\frac{148776}{1032}$ $\frac{147772}{3952}$ Cal Gas Reading:	1.3 /500 : % Trial 3: Counts Obs Counters Obs	4 100% erved for the Span= erved for the Zero= 3 3 2^{2} p	146100 3825
Ilibration Prec	ision= Average Difference/Ca unts Observed for the Span= <u>nters Observed for the Zero=</u> unts Observed for the Span= <u>iters Observed for the Zero=</u> Calibration Check Calibration Check Description: n Description:	= 100% $= 99.74$ $= 99.74$ $= 107.74$ $= 108776$ $= 1032$ $= 107.74$ $= 107.74$ $= 100%$	1.3 /500 : % Trial 3: Counts Obs Counters Obs Counters Obs	$\frac{100\%}{\text{erved for the Span}}$ $\frac{\text{erved for the Zero}}{5} p$	146100 3825 pm

STEG	632	tor Gun	weter and	 a tere		e is contained	13 -1-		Cul S		1.4	1
· · · · · · · · ·	· · · · · · · ·	이 같이 가 같이?	W JIE W	 1 . 1 - 1 S	N Stranger	રાખ્ય : જેને વધ્ય પ્ર		. F 3		- 54	- 224	S
		CALIBRATION AN	D PERTINEN	L DATA								
--	---	--	--	--	---							
Date:	9-24-24		Site Name:	Newby	×.							
Inspector(s):	Andrew	stone	Instrument:	TVA 2020								
WEATHER OF	SERVATIONS											
Wind Speec	:	Wind Direction: NNE		Barometric Pressure: 29.7	7 "Hg							
Ai Temperature	62 °F	General Weather Conditions:	Mostly So	nny								
CALIBRATION	INFORMATION		1									
Pre-monitoring	Calibration Precision Check											
Procedure Calib and colculate th precision must b nstrument Seria	rate the instrument. Make a e average algebraic difference e less than or equal to 10% o I Number:	total of three measurement re between the instrument re f the calibration gas value.	ts by alternating z eading and the ca	ero air and the calibrati libration gas as a percen Cal Gas Concentration:	on gas. Record the readings ntage. The calibration 500ppm							
rial	Zero Air Reading	Cal Gas Reading	Cal Gas Con	cCal Gas Reading	Response Time (seconds)							
1	-0.1	502	25	2	1							
3	-0.1	100	b		~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~							
		= 100%- _ 00 <	/5	00 × 100%								
		- 1 - 0 %	0									
an Sensitivity: al 1:		T ₁	rial 3:									
Cour	nts Observed for the Span= _	142312	Counts	Observed for the Span=	143852							
Counte	ers Observed for the Zero=	3958	Counters	Observed for the Zero=	3844							
arz: Coun	ts Observed for the Span=	143938										
		3889										
Counte	rs Observed for the Zero=	2001										
Counte t Monitoring Cal	ibration Check											
Counte t Monitoring Cal 9 Air ding:	ibration Check	Cal Gas Reading:	902_ppn	1								
Counte t Monitoring Cal Air ding: KGROUND CO	ibration Check	Cal Gas Reading:	902_ppn	1								
Counter t Monitoring Cal ding: KGROUND CO	ibration Check I C ppm NCENTRATIONS CHECKS scription:	Cal Gas Reading:	ppn Rea	ding 2.7	ppm							
Counter t Monitoring Cal ding: KGROUND COU ind Location Des	ibration Check CENTRATIONS CHECKS Scription: Description:	Cal Gas Reading:	ppn Rea Rea	ding: <u>2.7</u>	ppm							

		CALIBRATION A	ND PERTINE	NT DATA	
	6 1 21. 1 21		Site Name	1/	. 8.
Date		1	Site Harrie	TENBY	
Inspector(s	EPAL		Instrument	TVA 2020	
WEATHER	OBSERVATIONS				
	?	Wind		Barometric	
Wind Sp	eed: МРН	Direction AVC	<u></u>	Pressure	- Hg
Temperai	Air sure: <u>67</u> *F	General Weath Condition	er ns <u>Cloudy</u>	<u></u>	
CALIBRATI	ON INFORMATION				
Pra monitor	ing Calibration Precision (1	heck			
and calculat precision mu Instrument S	e the average algebraic dif ist be less than or equal to erial Number	fference between the instrumen 10% of the calibration gos value 2367	creading and the	calibration gas as a percent	age The calibratio
Trial	Zero Air Reading	Cal Gas Reading	Cal Gas (Conc -Cal Gas Reading	Response Time (s
1	U	100		7	6
		575 501			the second
3 Jalıbration Pr	ecision= Average Difference	Average Difference	*Perform recalibratio	3 on If average difference is greater than	10
3 Calibration Pr	ecision= Average Difference	Average Difference ce/Cal Gas Conc X 100% = 100% = 99 0	*Perform recalibratio	3 on if average difference is greater than /500 x 100%	6
3 Calibration Pr	ecision= Average Difference	Average Difference ce/Cal Gas Conc X 100% = 100% = 99 .8	*Perform recalibratio	3 on if average difference is greater than /500 x 100%	10
2 3 Calibration Pr pan Sensitivit rial 1:	ecision= Average Differenc	Average Difference ce/Cal Gas Conc X 100% = 100% = 99 .8	*Perform recalibration	3 on if average difference is greater than /500 x 100%	10
2 3 Calibration Pr pan Sensitivit rial 1:	ecision = Average Difference	Average Difference ce/Cal Gas Conc X 100% = 100% = 99 .8 ipan= 19315	*Perform recalibration 1 % <u>Trial 3:</u> Cou	3 on if average difference is greater than /500 x 100% nts Observed for the Span=	6 10 10
2 3 Calibration Pr pan Sensitivit rial 1:	ecision = Average Difference y Counts Observed for the S punters Observed for the Z	Average Difference ce/Cal Gas Conc X 100% = 100% = 99 .8 pan= 191315 Zero= 5042	*Perform recalibration *Perform recalibration 1 % <u>Trial 3:</u> Cou Count	3 on if average difference is greater than _/500 x 100% nts Observed for the Span= ters Observed for the Zero=	6 10 10 10 10 10 10 10 10 10
2 3 Calibration Pr pan Sensitivit rial 1: Co rial 2:	ecision = Average Difference y Counts Observed for the S punters Observed for the Z	Average Difference Average Difference ce/Cal Gas Conc X 100% = 100% = 99 .8 pan= 191315 Zero= 5042 pan= 191320	*Perform recalibration *Perform recalibration 1 % <u>Trial 3:</u> Count Count	3 on if average difference is greater than /500 x 100% nts Observed for the Span= ters Observed for the Zero=	6 10 10 10 10 10 10 10 10
2 3 Calibration Pr ipan Sensitivit rial 1: Co rial 2:	ecision= Average Difference y: Counts Observed for the S bunters Observed for the Z Counts Observed for the S	Average Difference Average Difference ce/Cal Gas Conc X 100% = 100% = 99 .8 ipan= 19315 Zero= 5042 pan= 101330	*Perform recalibration *Perform recalibration 1 % <u>Trial 3:</u> Count Count	3 an if average difference is greater than /500 x 100% nts Observed for the Span= ters Observed for the Zero=	6 10 10 10 10 10 10 10
2 3 Calibration Pr <u>ipan Sensitivit</u> <u>rial 1:</u> Co	ecision= Average Difference y: Counts Observed for the S punters Observed for the Z Counts Observed for the S unters Observed for the S	Average Difference Average Difference ce/Cal Gas Conc X 100% = 100% = 99 .8 ipan= 191315 Zero= 5042 pan= 191320 iero= 5052	*Perform recalibration 1 % <u>Trial 3:</u> Count Count	3 (500 x 100%) (500 x 100%) nts Observed for the Span= ters Observed for the Zero=	6 10 <i>M1574</i> 5872
Calibration Pr Span Sensitivit rial 1: Co rial 2: Co Dost Monitorin	ecision= Average Difference y: Counts Observed for the S bunters Observed for the Z Counts Observed for the S unters Observed for the Z g Calibration Check	Average Difference Average Difference ce/Cal Gas Conc X 100% = 100% = 99 .8 ipan= 191315 Zero= 5042 pan= 191320 iero= 5052	*Perform recalibration 1 % Trial 3: Count Count	3 on if average difference is greater than /500 x 100% nts Observed for the Span= ters Observed for the Zero=	6 10 10 10 10 10 10 10 10 10
2 3 Calibration Pr pan Sensitivit rial 1: Co rial 2: Co Dist Monitorin ro Air	ecision= Average Difference y: Counts Observed for the S bunters Observed for the Z Counts Observed for the Z unters Observed for the Z g Calibration Check	Average Difference Ee/Cal Gas Conc X 100% = 100% = 99 .8 Span= 191315 Zero= 5042 pan= 101330 Zero= 5052 Cal Gas	*Perform recalibration	3 on if average difference is greater than /500 x 100% Ints Observed for the Span= ters Observed for the Zero=	6 10 10 10 10 10 10 10
2 3 Calibration Pr pan Sensitivit rial 1: Co rial 2: Co Dot Monitorin ro Air rading	ecision= Average Difference y: Counts Observed for the Sounters Observed for the Z counts Observed for the Z unters Observed for the Z g Calibration Check ppm	Average Difference Average Difference ce/Cal Gas Conc X 100% = 100% = 99 .8 Gan= 191315 Cero= 5042 pan= 191320 Cal Gas Reading	*Perform recalibration *Perform recalibration 1 % Trial 3: Cou Count 496	3 on if average difference is greater than /500 x 100% Ints Observed for the Span= ters Observed for the Zero=	6 10 10 10 10 10 10 10 10
Calibration Pr Calibration Pr Gan Sensitivit rial 1: Co rial 2: Co Co Dost Monitorin ero Air ero Air ero Air ero Air	ecision= Average Difference y Counts Observed for the S bunters Observed for the S unters Observed for the S unters Observed for the Z g Calibration Check CONCENTRATIONS CH	Average Difference Average Difference ce/Cal Gas Conc X 100% = 100% = 99 .8 ipan= 191315 Zero= 5042 pan= 191320 Cal Gas Reading ECKS M	*Perform recalibration *Perform recalibration 1 % Trial 3: Count Count 4966	3 an if average difference is greater than /500 x 100% nts Observed for the Span= ters Observed for the Zero=	6 10 10 10 5072
2 3 Calibration Pr pan Sensitivit rial 1: Co rial 2: Co Dot Monitorin ro Air ading. CCKGROUNE wind Locatio	ecision= Average Difference y: Counts Observed for the S punters Observed for the Z Counts Observed for the Z unters Observed for the Z g Calibration Check CONCENTRATIONS CH n Description:	Average Difference Average Difference ce/Cal Gas Conc X 100% = 100% = 99 .8 ipan= 191315 Zero= 5042 pan= 191320 iero= 5052 Cal Gas Reading ECKS	*Perform recalibration *Perform recalibration 1 % Trial 3: Count Count UA 6	3 an if average difference is greater than /500 x 100% nts Observed for the Span= ters Observed for the Zero= ppm Reading 2.7	ррт
2 3 Calibration Pr pan Sensitivit rial 1: Co rial 2: (Co DSt Monitorin ro Air ading. ICKGROUNE wind Locatio wn wind Loca	ecision= Average Difference y: Counts Observed for the S punters Observed for the Z Counts Observed for the Z counts Observed for the Z g Calibration Check CONCENTRATIONS CH n Description: tion Description.	Average Difference Average Difference ce/Cal Gas Conc X 100% = 100% = 99 .8 ipan= 191315 Zero= 5042 pan= 191320 iero= 5052 Cal Gas Reading ECKS Hare G 249	Perform recalibration	3 an if average difference is greater than /500 x 100% nts Observed for the Span= ters Observed for the Zero= ppm Reading 2.7 Reading 5.7	ррт ррт

		SUPEACE CANSSIC	NIC MANITADINIC	
		CALIBRATION AND) PERTINENT NATA	
	a 211 2.	σματικα ματικά ματαγγά ματαγγά ματαγγά του το		
Date	7-69-64	1	Site Name: NEWBY	
Inspector(s)	the with		Instrument: TVA 2020	
WEATHER	OBSERVATIONS DON C	Tiben		
	237030			
Wind Spe	red: 3 MPH	Wind Direction: <u>////E</u>	Barometric Pressure: <u>29</u> .	77 "Hg
Temperatu	Air ure: <u>62</u> °F	General Weather Conditions:	SUMMY	
CALIBRATIO	N INFORMATION			
Pre-monitorir	a Calibration Precision Check			
	-B can all a transition of realision circuit			
and calculate precision musi Instrument Sei	the average algebraic differe t be less than or equal to 10% rial Number:	nce between the instrument rea of the calibration gas value.	ading and the calibration gas as a perc Cal Gas Concentratic	n: 500ppm
Trial	Zero Air Reading	Cal Gas Beading	I Cal Gas Conc - Cal Gas Reading I	Response Time (seconds)
1	0	501	I car das conccar das Reading	6
2	-0.1	502	2	7
3		503	3	6
		= 100%	. ~/500 x 100%	
		= 99.6 %		
an Sensitivity:		1.1.18		
Int 4.			1.0	
CC	ounts Observed for the Span=	148236	Counts Observed for the Spa	147754
Cou	ounts Observed for the Span=	148236 Tri	Counts Observed for the Spa	147754 4197
Cou Cou al 2: Co	nters Observed for the Span= nters Observed for the Zero= unts Observed for the Soan=	148236 19457 4047 148044	Counts Observed for the Spa Counters Observed for the Zero	n= 147754 n= 4197
Cou Cou al 2: Cou Cour	ounts Observed for the Span= nters Observed for the Zero= unts Observed for the Span= nters Observed for the Zero=	<u>148236</u> <u>4845</u> <u>148044</u> <u>4292</u>	Counts Observed for the Spa Counters Observed for the Zero	n= 147754 p= 4197
Cou Cou <u>al 2:</u> Co Cour t Monitoring (ounts Observed for the Span= nters Observed for the Zero= unts Observed for the Span= nters Observed for the Zero= Calibration Check	<u>148236</u> <u>1945</u> <u>1945</u> <u>196099</u> <u>178099</u> <u>4292</u>	Counts Observed for the Spa Counters Observed for the Zero	n= 147754 n= 4197
Cou <u>Cou</u> <u>al 2:</u> Co <u>Cour</u> t Monitoring (ounts Observed for the Span= nters Observed for the Zero= unts Observed for the Span= nters Observed for the Zero= Calibration Check	<u>148236</u> <u>4845</u> <u>148044</u> <u>4292</u>	Counts Observed for the Spa Counters Observed for the Zero	n= 147754 p= 4197
Cou <u>Cou</u> <u>al 2:</u> Co Cour t Monitoring (D Air ding:	ounts Observed for the Span= nters Observed for the Zero= unts Observed for the Span= nters Observed for the Zero= Calibration Check	<u>148236</u> <u>4945</u> <u>4945</u> <u>148044</u> <u>4292</u> Cal Gas Reading:	Counts Observed for the Spa Counters Observed for the Zero	n= 147754 p= 4197
Cou Cou al 2: Co Cour t Monitoring (D Air ding: CKGROUND C	ounts Observed for the Span= nters Observed for the Zero= unts Observed for the Span= nters Observed for the Zero= Calibration Check	<u>148236</u> <u>4945</u> <u>1945</u> <u>198044</u> <u>178044</u> <u>1297</u> Cal Gas Reading:	Counts Observed for the Spa	n= <u>147754</u> n= <u>4197</u>
Cour al 2: Cour t Monitoring (o Air ding: CKGROUND (rind Location [Dunts Observed for the Span= nters Observed for the Zero= unts Observed for the Span= nters Observed for the Zero= Calibration Check CONCENTRATIONS CHECKS Description:	<u>148236</u> <u>4845</u> <u>4845</u> <u>4947</u> <u>148044</u> <u>4292</u> Cal Gas Reading: <u>5</u> <u>Мале</u>	Counts Observed for the Spa Counters Observed for the Zerd ppm Reading: 2.2	n= <u>147754</u>)= <u>4197</u>
Cou <u>Cou</u> <u>al 2:</u> Co <u>Cour</u> t Monitoring (<u>Cour</u> t Monitoring (<u>Cour</u> t Monitoring (<u>Cour</u> Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour Cour	ounts Observed for the Span= nters Observed for the Zero= unts Observed for the Span= nters Observed for the Zero= Calibration Check Concentrations Checks Description: on Description:	<u>148236</u> <u>4945</u> <u>4945</u> <u>4947</u> <u>148044</u> <u>4292</u> Cal Gas Reading:	Counts Observed for the Spa Counters Observed for the Zerd ppm Reading: 2.7 Reading: 3.2	n= <u>/ Ч 7 75 Ч</u>)= <u>Ч 1 9 7</u> _ppm _ppm

STEL STREET _____ STREET STREE

		SURFACE EMISS		RING	
	9-211-20	211		N/a hu	
Date	CI1:1 8	24	Site Name:	Newby	
Inspector(s):	_ COULD ST	OWI	Instrument:	VA 2020	V
WEATHER OBS	ERVATIONS	э.			
Wind Speed:	МРН	Wind Direction: MVE	8	arometric Pressure: <u>29,22</u>	"Hg
Air Temperature:	62_°F	General Weathe Conditions	Sunny		
CALIBRATION IN	FORMATION		1		
Pre-monitoring C	alibration Precision Check				
Procedure: Calibro and calculate the precision must be Instrument Serial I	ate the instrument. Make of average algebraic difference less than or equal to 10% of Number:	a total of three measuremen ce between the instrument r of the calibration gas value 23	ts by alternating zerc reading and the calibi Ca	o air and the calibration ration gas as a percenti al Gas Concentration:	gas, Record the readings age. The calibration 500ppm
Trial	Zero Air Reading	Cal Gas Reading	I Cal Gas Conc -	Cal Gas Reading	Response Time (seconds
1	<u> </u>	501		eer das needing]	Seconds Mile (Seconds
3	-0.1	500	 		2
		$= \frac{100\%}{4} = \alpha 4 4 3 3 3$	<u> </u>	x 100%	
nan Sensitivity			•		
rial 1: Count:	5 Observed for the Span=	129464	rial 3: Counts Ob	served for the Span=	28668
Counter	5 Observed for the Zero=	4644	Counters Ob	served for the Zero=	4563
r <u>ial 2:</u> Counts	Observed for the Span=	129172			,
Counters	– Observed for the Zero=	4571			
st Monitoring Calib	ration Check				
ro Air ading:	2ppm	Cal Gas Reading: <u>5</u>	OOppm		
CKGROUND CON	CENTRATIONS CHECKS				
wind Location Desc	ription:	Place	Readin	g: <u>2.7</u> pp	m
vnwind Location De	scription	gr 12 219	Reading	g: <u>3.2</u> pp	m
es: Wind	speed averages were obse	erved to remain below the a	Iternative requested	10 miles per hour and	no instantaneous speeds

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		SURFACE EMI	SSIONS MONI	ITORING	
		CALIBRATION	AND PERTINE	NT DATA	
Date	09/24/24		Site Name:	Newby	-
Inspector(s)	A. GOM	nez	Instrument:	TVA 2020	
WEATHER (DBSERVATIONS			2	
Wind Spe	ed: 73 MP	Wind H Direction: <u>NN</u>	E	Barometric Pressure: 29.77 "Hg	
Temperatu	Air re: <u>62</u> F	General Wea Conditi	ther ons: SUNNY	_	
CALIBRATIO	V INFORMATION		U		
Pre-monitorin	g Calibration Precision (Check			
Procedure: Ca and calculate precision must	ibrate the instrument. the average algebraic d. be less than or equal to	Make a total of three measurer lifference between the instrume o 10% of the calibration gas valu	nents by alternatin <u>c</u> nt reading and the ue.	g zero air and the calibration gas. Record th calibration gas as a percentage. The calibr	he readii ation
		2364		Cal Gas Concentration 500p	mqq
Trial	Zero Air Readin	g Cal Gas Reading	Cal Gas C	ioncCal Gas Reading Response Tim	ne (seco
5 1					
2	- 0 . (500		<u>u</u>	-
2 3	-01	Average Difference:	Perform recalibration	y 3 If average difference is greater than 10	
2 3 Calibration Prec	sion= Average Different	Average Difference: ce/Cal Gas Conc. X 100%	Ferform recalibration	4 3 if average difference is greater than 10 /500 × 100%	<u>}</u>
2 3 Calibration Prec	sion= Average Differen	Average Difference: ce/Cal Gas Conc. X 100% = 1009 = 99.50	Perform recalibration	y if average difference is greater than 10 /500 x 100%	3
2 3 Calibration Prec	sion= Average Differen	Average Difference: ce/Cal Gas Conc. X 100% = 1009 = 99.50	Perform recalibration	y if average difference is greater than 10 /500 x 100%	<u>}</u>
2 3 Calibration Prec Span Sensitivity: Trial 1: Co	sion= Average Different	Average Difference: ce/Cal Gas Conc. X 100% = 100% = 99.50 span= 191808	Perform recalibration	y if average difference is greater than 10 /500 x 100% ts Observed for the Span= 1905	52
2 3 Calibration Prec Span Sensitivity: <u>Trial 1:</u> Co Cour	sion= Average Different	Average Difference: ce/Cal Gas Conc. X 100% = 100% = 99.50 Span= 191808 Zero= 4947	Perform recalibration - 2.3 % Trial 3: Counter Counter	$\frac{4}{3}$ if average difference is greater than 10 /500 x 100% ts Observed for the Span= 1905 rs Observed for the Zero= 4839	52
2 3 Calibration Prec Span Sensitivity: Trial 1: Co Cour Trial 2: Cou	sion= Average Different unts Observed for the S ters Observed for the Z	Average Difference: ce/Cal Gas Conc. X 100% = 1009 = 99.50 Span= 191808 Zero= 4947 pan= 192464	Perform recalibration ← <u>2.3</u> (% <u>Trial 3:</u> Counter Counter	$\frac{4}{3}$ if average difference is greater than 10 /500 x 100% ts Observed for the Span= 1905; rs Observed for the Zero= 4839	52
2 3 Calibration Prec Span Sensitivity: Trial 1: Cour Trial 2: Cour Cour	sion= Average Different unts Observed for the S ters Observed for the S ters Observed for the S ters Observed for the S	Average Difference: ce/Cal Gas Conc. X 100% = 100% = 99.5% Gen= 191808 Zero= 4947 pan= 192464 pan= 192464 ero= 41887	Perform recalibration	$\frac{4}{3}$ if average difference is greater than 10 /500 x 100% ts Observed for the Span= 1405 rs Observed for the Zero= 1839	52
2 3 Calibration Prec Span Sensitivity: <u>Trial 1:</u> Cour <u>Trial 2:</u> Cour Post Monitoring C	sion= Average Different unts Observed for the S ters Observed for the S ints Observed for the S ters Observed for the S ters Observed for the S ters Observed for the S	191808 191808 2ero= 191808 2ero= 19447 pan= 19208 19208 1947 pan= 19208 19208 1947 pan= 19208 19208 1947 19209 1947	Perform recalibration	$\frac{4}{3}$ if average difference is greater than 10 /500 x 100% ts Observed for the Span= 1405 rs Observed for the Zero= 1839	52
2 3 Calibration Prec Span Sensitivity: Trial 1: Cour Trial 2: Cour Post Monitoring C Zero Air Reading:	sion= Average Different unts Observed for the S ters Observed for the S ints Observed for the S ants Observed for the S ters Observed for the S	Average Difference: ce/Cal Gas Conc. X 100% = 1009 = 99.54 Gpan= <u>191808</u> Cero= <u>4947</u> pan= <u>192464</u> ero= <u>4887</u> Cal Gas Beading:	Perform recalibration	$\frac{1}{3}$ if average difference is greater than 10 /500 x 100% ts Observed for the Span= 1905 rs Observed for the Zero= 0.839	52
2 3 Calibration Prec Span Sensitivity: Trial 1: Cour Trial 2: Cour Post Monitoring C Zero Air Reading: BACKGROUND CO	sion= Average Different unts Observed for the S ters O	Average Difference: ce/Cal Gas Conc. X 100% = 1009 = 99.50 Geno= 191808 Zero= 49477 pan= 19208 Zero= 49477 Cal Gas Reading: FCKS	Perform recalibration	y if average difference is greater than 10 /500 x 100% ts Observed for the Span= 1905 rs Observed for the Zero= 1939 pm	52
2 3 Calibration Prec Span Sensitivity: Trial 1: Cour Trial 2: Cour Post Monitoring C Zero Air Reading: BACKGROUND CO	sion= Average Different unts Observed for the S ters Observed for the S ints Observed for the S ters Observed for the S alibration Check 1ppm DNCENTRATIONS CHE escription:	$\frac{500}{444}$ Average Difference: ce/Cal Gas Conc. X 100% = 100% = 99.5° Gpan= <u>191808</u> Cero= <u>4947</u> pan= <u>192464</u> ero= <u>4947</u> Cal Gas Reading: ECKS <i>Mune</i>	Perform recalibration Counter Uqqq pi	pm Pading: 2.7 norm	52
2 3 Calibration Prec Span Sensitivity: Trial 1: Cour Trial 2: Cour Post Monitoring C Zero Air Reading: BACKGROUND CO Jpwind Location D Coun Mind Location	sion= Average Different unts Observed for the S ters O	$\frac{500}{444}$ Average Difference: ce/Cal Gas Conc. X 100% = 100% = 99.5% Gron = 191808 Zero = 4947 pan = 19208 Zero = 4947 pan = 19208 Cal Gas Reading: ECKS $\int I mc$ grid	Perform recalibration	pm eading: $\frac{2.7}{3.2}$ ppm eading: $\frac{2.7}{3.2}$ ppm	52

WER BERRE SHARTER	- Sales of Reality	5.5.5.5.5.5.5.5.5.5.5.5.5.5.5.5.5.5.5.	KALL PARA	

		SURFACE EMIS	SIONS MONITO	DRING	
		CALIBRATION A	ND PERTINENT	DATA	
Date:	09/24/24		Site Name:	Newby	
Inspector(s):	Alredon	rendoza	Instrument:	TVA 2020	
WEATHER OB:	SERVATIONS			17	
Wind Speed	МРН	Wind Direction:		Barometric Pressure: <u>29:1</u>	2 "нg
Air Temperature:	<u>6</u> 2	General Weath Condition	er 15: <u>Sonnz</u>	_	
CALIBRATION	NFORMATION		0		
Pre-monitoring C	alibration Precision Check				
Procedure ⁻ Calibi and calculate the precision must be	ate the instrument. Make a average algebraic difference less than or equal to 10% o	total of three measureme te between the instrument f the calibration gas value	ents by alternating ze reading and the cali	ro air and the calibratic bration gas as a percen	on gas. Record the reading tage. The calibration
Instrument Serial	Number: <u>54</u>	20	(Cal Gas Concentration	500ppm
Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Conc	Cal Gas Reading	Response Time (secon
2	0.0	300		2	
3	-0.1	444	1	1	1 1
alibration Precisic	n= Average Difference/Cal	Gas Conc. X 100% = 100%- = 09 6	2/50 %	0 × 100%	
an Sensitivity:		91-+			
<u>ial 1:</u> Count	s Observed for the Span=	28416	<u>Trial 3:</u> Counts O	bserved for the Span=	130392
Counter	s Observed for the Zero=	3598	Counters O	bserved for the Zero=	3549
ai <u>2:</u> Count:	o Observed for the Span=_	130176			
Counter	s Observed for the Zero=	3580			
t Monitoring Calib	pration Check				
o Air ding:	3ppm	Cal Gas Reading:	<u>302</u> _ppm		
KGROUND CON	CENTRATIONS CHECKS				
vind Location Desc	ription: —	llac	Readi	ng: <u>2.7</u> p	pm
nwind Location D	escription	grid Z19	Readi	ng: 37 p	m
		1			

WEB BOST STATISTICS - STORAGE PARTY STATISTICS BUSINESS - FROM IL

		CALIBRATION AN	IONS MONIT D PERTINEN	URING IT DATA	
Date	09-24-24		Site Name:	Newby	,
Inspector(s)	Ricardo	Lepoz	Instrument;	TVA 2020	
WEATHER O	BSERVATIONS				
Wind Spee	d: <u>3</u> мрн	Wind Direction: NNE	_	Barometric Pressure: 29.7	"нд
A Temperature	ir e: <u>62</u> *F	General Weather Conditions	Sunny	e	
CALIBRATION	INFORMATION				
Pre-monitoring	Calibration Precision Check				
Procedure: Cali and colculate th precision must b Instrument Seria	brate the instrument. Make a ne average algebraic difference ne less than or equal to 10% o al Number:	total of three measuremen re between the instrument r f the calibration gas value.	ts by alternating . eading and the co	zero air and the calibratio alibration gas as a percent Cal Gas Concentration	n gas. Record the real tage. The calibration
Trial	Zoro Air Popding	Cal Cas Poodies			
1	~ 0.1	500		CCal Gas Reading	Response Time (see
2	0	502		2	B
3	-0-1	500		0	B
Calibration Precis	ion= Average Difference/Cal	Average Difference:	Perform recalibration if	2 average difference is greater than	10
Calibration Precis	ion= Average Difference/Cal (Average Difference:	Perform recalibration if	2 average difference is greater than 500 x 100%	10
Calibration Precis	ion≃ Average Difference/Cal (Average Difference: [Gas Conc. X 100% = 100% = 49.88%	Perform recalibration if , 6	2 average difference is greater than 500 x 100%	10
Calibration Precis Span Sensitivity: <u>Trial 1:</u> Cou	ion= Average Difference/Cal of not spane 1	Average Difference: Gas Conc. X 100% = 100% - = 99.3% 62620	Perform recalibration if , 6 /: rial 3: Counts	2 average difference is greater than 500 x 100% Observed for the Span=	162072
Calibration Precis Span Sensitivity: <u>Trial 1:</u> Cou Count	ion= Average Difference/Cal of nts Observed for the Span= 1 ers Observed for the Zero=	Average Difference: $\begin{bmatrix} & & & \\ & & & \\ & & & \\ & & & & $	Perform recalibration if , 6 rial 3: Counts Counters	2 average difference is greater than 500 x 100% Observed for the Span= Observed for the Zero=	162072 4952
Calibration Precis Span Sensitivity: Trial 1: Cou <u>Count</u> Trial 2: Cour	ion= Average Difference/Cal of nts Observed for the Span= 1 ers Observed for the Zero=	Average Difference: [Gas Conc. X 100% = 100%- = 99.8% 62.620 5038 60.668	Perform recalibration if , (, /! , (, /! , /! , (,) , (,)), ((,)), ((,)), ((,)), ((,)), ((,)), ((,)), ((,)), ((,)), ((,)), ((,)), (((,))), (((,))), (((,))), (((,))), ((((,)))), ((((,)))), ((((((((2 average difference is greater than 500 x 100% Observed for the Span= Observed for the Zero=	162072 4952
Calibration Precis Span Sensitivity: Trial 1: Cou Count Trial 2: Court	ion= Average Difference/Cal of the Spane $\frac{1}{2}$ and the Spane $\frac{1}{2}$ an	Average Difference: Gas Conc. X 100% = 100%- = 99.88 62.620 5038 60.668 1986	Perform recalibration if , 6 /! fial 3: Counts Counters	2 average difference is greater than 500 x 100% Observed for the Span= Observed for the Zero=	162072 14952
Calibration Precis Span Sensitivity: <u>Trial 1:</u> Count <u>Trial 2:</u> Counte Post Monitoring Ca	ion= Average Difference/Cal of nts Observed for the Span= $\frac{1}{2}$ and the S	Average Difference: [Gas Conc. X 100% = 100%- = 99.88 62620 5038 60668 1986	Perform recalibration if , 6 <u>rial 3:</u> Counts <u>Counters</u>	average difference is greater than 500 x 100% Observed for the Span= Observed for the Zero=	162072 4952
Calibration Precis Span Sensitivity: Trial 1: Cou Count Trial 2: Cou Post Monitoring Ca Zero Air Reading:	ion= Average Difference/Cal of nts Observed for the Span= $\frac{1}{2}$ nts Observed for the Zero= ints Observed for the Zero= $\frac{1}{2}$ nts Observed for the Zero= $\frac{1}{2}$ libration Check	Average Difference: [Gas Conc. X 100% = 100%- = 99.38 62.620 5038 60.668 1986 Cal Gas Reading:	Perform recalibration if , 6 /: fiel 3: Counts Counters	2 average difference is greater than 500 x 100% Observed for the Span= Observed for the Zero=	162072 14952
Calibration Precis Span Sensitivity: Trial 1: Cou Count Trial 2: Cou Counte Post Monitoring Ca Zero Air Reading: BACKGROUND CO	ion= Average Difference/Cal of r the Span= $\frac{1}{2}$ ers Observed for the Span= $\frac{1}{2}$ its Observed for the Span= $\frac{1}{2}$ its Observed for the Span= $\frac{1}{2}$ ibration Check $\frac{1}{2}$ ppm NCENTRATIONS CHECKS	Average Difference: $\begin{bmatrix} & & & \\ & & $	Perform recalibration if , 6 // rial 3: Counts Counters	2 average difference is greater than 500 x 100% Observed for the Span= Observed for the Zero=	162072 14952
Calibration Precis Span Sensitivity: Trial 1: Cou Count Trial 2: Cour Post Monitoring Ca Zero Air Reading: BACKGROUND CO Jpwind Location De	ion= Average Difference/Cal of the Span= $\frac{1}{2}$ ers Observed for the Span= $\frac{1}{2}$ its Observed for the Zero= $\frac{1}{2}$ its Observed for the Span= $\frac{1}{2}$ ers Observed for the Zero= $\frac{1}{2}$ libration Check $\frac{1}{2}$ ppm NCENTRATIONS CHECKS scription:	Average Difference: [Gas Conc. X 100% = 100%- = 99.88 62.620 5038 60.668 1986 Cal Gas Reading: 1	Perform recalibration if , 6 // rial 3: Counts Counters ppr Rea	average difference is greater than 500 x 100% Observed for the Span= Observed for the Zero= m n ading: 2.7 p	162072 14952
Calibration Precis Span Sensitivity: Trial 1: Cou Count Trial 2: Cour Post Monitoring Ca Zero Air Reading: BACKGROUND CO Jpwind Location De Downwind Location	ion= Average Difference/Cal of nts Observed for the Span= 1 ers Observed for the Zero= nts Observed for the Span= 1 ers Observed for the Zero= libration Check (3 ppm NCENTRATIONS CHECKS scription: Description:	Average Difference: Sas Conc. X 100% = 100%- = 99.88 62620 5038 60668 1986 Cal Gas Reading: 11me gmid 219	Perform recalibration if , 6 // fiel 3: Counts Counters Counters Rea Rea	average difference is greater than $500 \times 100\%$ Observed for the Span= Observed for the Zero= m ading: <u>2.7</u> p ading: <u>3.2.</u> p	162072 162072 4952

		CALIBRATION A	VD PERTINIER		
Date	09/25/24	со с 1 2 1 20 1 40 4 1 1 62 1 4 7 5 1 5 1 5 1 5 1 5 1 5 1 5 1 5 1 5 1 5	Site Name	Akuba	
Inspector(r)	All A. M.	. In .	Site Name.	Tourog	
mspector(s)	ando na	narrh	Instrument		
WEATHER OBS	SERVATIONS				
Wind Count	2	Wind		Barometric	-
wind speed:		Direction: 3 W		Pressure: 29.2	Hg
Air Temperature:	58 1	General Weathe	er s: Cloudy		
CALIDRATION			ciocay	1	
CALIONATIVIA	IAPORIAIN LIOLA				
Pre-monitoring C	alibration Precision Check				
Procedure: Calibr	ate the instrument. Make	a total of three measureme	nts by alternating	zero air and the calibrat	ion gas_ Record the readin
and calculate the precision must be	average algebraic differen less than or equal to 10% (ice between the instrument of the calibration gas value.	reading and the c	alibration gas as a perce	ntage. The calibration
nstrument Serial	Number: CU2	20		C-1 C-1 C	
				Cal Gas Concentration	500pm
rial 1	Zero Air Reading	Cal Gas Reading	Cal Gas Co	ncCal Gas Reading	Response Time (secon
2	0	SOL	5	~	1
2					
3	n= Average Difference/Cal	Average Difference:	*Perform recalibration ii	f average difference is greater tha] n 10
3	n= Average Difference/Cal	Average Difference: Gas Conc. X 100%	*Perform recalibration ii 4.3	f average difference is greater tha 500 x 100%	 n 10
3	on= Average Difference/Cal	Average Difference: Gas Conc. X 100% = 100%- = QQ SU	*Perform recalibration il 1 .3	f average difference is greater tha	 n 10
3 libration Precisio	on= Average Difference/Cal	Average Difference: Gas Conc. X 100% = 100%- = 99.54	*Perform recalibration ii 1 .3	f average difference is greater tha	 n 10
ibration Precisio	n= Average Difference/Cal	Average Difference: Gas Conc. X 100% = 100%- = 99.54	*Perform recalibration il 4 .3 % Trial 3:	f average difference is greater tha	n 10
ibration Precisio	on= Average Difference/Cal	Average Difference: Gas Conc. X 100% = 100%- = 99.54	*Perform recalibration il 4 .3 % <u>Trial 3:</u> Counts	f average difference is greater tha 500 x 100% Observed for the Span=	10 - 10 - 117 428
ibration Precisio	on= Average Difference/Cal s Observed for the Span=	Average Difference: Gas Conc. X 100% = 100%- = 99.54 115676 3570	*Perform recalibration if *Perform recalibration if 2.3 % Trial 3: Counts Counters	f average difference is greater tha 500 x 100% Observed for the Span= 5 Observed for the Zero=	117428 3515
ibration Precisio Sensitivity: 11: Counter 12: Counts	on= Average Difference/Cal s Observed for the Span= s Observed for the Zero= s Observed for the Span=	Average Difference: Gas Conc. X 100% = 100%- = 99.5(1) 115676 3570 116752	*Perform recalibration if 2 .3 % <u>Trial 3:</u> Counts <u>Counters</u>	f average difference is greater tha 500 x 100% Observed for the Span= 5 Observed for the Zero=	117428 3515
in Sensitivity: II Sensitivity: II 1: Counter I 2: Counter	on= Average Difference/Cal s Observed for the Span= <u>s Observed for the Zero=</u> s Observed for the Span=	Average Difference: Gas Conc. X 100% = 100% = 99.5% 115676 3570 116752 = 3.5%	*Perform recalibration if 4.3 % <u>Frial 3:</u> Counts <u>Counters</u>	f average difference is greater tha 500 x 100% Observed for the Span= 5 Observed for the Zero=	10 10 117428 3515
in Sensitivity: In Sensitivity: II: Counter Counter Counter	orn= Average Difference/Cal s Observed for the Span= <u>s Observed for the Zero=</u> s Observed for the Span= <u>s Observed for the Zero=</u>	Average Difference: Gas Conc. X 100% = 100% - = 99.5% 115676 3570 116752 3 498	*Perform recalibration ii 4 .3 % <u>Frial 3:</u> Counters	i average difference is greater tha 500 x 100% Observed for the Span= 5 Observed for the Zero=	10 10 <u>117428</u> <u>3515</u>
ibration Precisio	s Observed for the Span= s Observed for the Zero= s Observed for the Zero= s Observed for the Zero=	Average Difference: Gas Conc. X 100% = 100% - = 99.5% 115676 3570 116757 3 498	*Perform recallbration if 4 .3 / % T <u>rial 3:</u> Counts <u>Counters</u>	f average difference is greater tha 500 x 100% Observed for the Span= 5 Observed for the Zero=	10 10 <u>117428</u> <u>3515</u>
ibration Precisio	s Observed for the Span= s Observed for the Zero= s Observed for the Zero= s Observed for the Zero= oration Check	Average Difference: Gas Conc. X 100% = 100%- = 99.5% 115676 3570 116757 3 498 Cal Gas	*Perform recalibration ii 2 .3 / % <u>Trial 3:</u> Counts <u>Counters</u>	f average difference is greater tha 500 x 100% Observed for the Span= 5 Observed for the Zero=	117428 3515
Iibration Precisio	s Observed for the Span= s Observed for the Zero= s Observed for the Zero= s Observed for the Zero= oration Check 3ppm	Average Difference: Gas Conc. X 100% = 100%- = 99.54 115676 3570 116752 3 498 Cal Gas Reading: 5	*Perform recalibration if 4.3 % Trial 3: Counts Counters 03 pp	f average difference is greater tha 500 x 100% Observed for the Span= 5 Observed for the Zero=	117428 3515
Ibration Precision In Sensitivity: II: Counter Counter Counters Monitoring Calib Air ing: Counter Monitoring Calib	In = Average Difference/Cal s Observed for the Span= s Observed for the Zero= s Observed for the Zero= s Observed for the Zero= bration Check 3 ppm CENTRATIONS CHECKS	Average Difference: Gas Conc. X 100% = 100%- = 99.54 115676 3570 116752 3 498 Cal Gas Reading: 5	*Perform recalibration if 4.3 % Trial 3: Counters Counters	f average difference is greater tha 500 x 100% Observed for the Span= 5 Observed for the Zero=	117428 3515
Iibration Precisio	o in= Average Difference/Cal s Observed for the Span= s Observed for the Zero= s Observed for the Zero= oration Check CENTRATIONS CHECKS ription:	Average Difference: Gas Conc. X 100% = 100%- = 99.5% 115676 3570 116757 3 498 Cal Gas Reading: 5	*Perform recalibration ii 4.3 / % Trial 3: Counters Counters 03 ppi Rea	faverage difference is greater than 500 x 100% Observed for the Span= 500served for the Zero= m ading: 3.7	ррт
Ibration Precision In Sensitivity: II: Counter Counter Counter Counters Counters Monitoring Calib Air Ing: Counters	In = Average Difference/Cal s Observed for the Span= s Observed for the Zero= s Observed for the Zero= s Observed for the Zero= oration Check 3 ppm CENTRATIONS CHECKS ription: escription.	Average Difference: Gas Conc. X 100% = 100%- = 99.54 115676 3570 116752 3 498 Cal Gas Reading: 5	*Perform recalibration ii 4.3 / % Trial 3: Counters Counters Rea Rea	The second seco	ррт орт
Ibration Precisio	s Observed for the Span= s Observed for the Span= s Observed for the Zero= s Observed for the Zero= bration Check CENTRATIONS CHECKS ription: escription: speed averages were obse	Average Difference: Gas Conc. X 100% = 100%- = 99.54 115676 3570 116752 3 498 Cal Gas Reading: 5 Mare nd erved to remain below the a	*Perform recalibration ii 4.3 / % Trial 3: Counters Counters 03 ppi Rea Rea	The second seco	ppm opm

WER BASS REALTERS - PRESS ARE REPARTED AND RESSEL DASSES - PROPER A

1		SURFACE EMISSI CALIBRATION AND	DNS MONI	TORING NT DATA	
Date	9-25-21	CUTION 81010 14141		N N N	
	1-65-64 DelaDera	· · · ·	Site Name:	Newby	
Inspector(s)	K-yepez		Instrument:	TVA 2020	
WEATHER OF	BSERVATIONS				
Wind Speed		Wind Star		Barometric 29	5
nind Speed				Pressure:	уу "Нg
Ai Temperature		General Weather Conditions:	cloudy		
CALIBRATION	INFORMATION		1	-	
	Calibration Provision Charles				
remonitoring	Canoration Precision Check				
Procedure: Calib and calculate th	prate the instrument. Make e average algebraic differen	a total of three measurements ace between the instrument re	s by alternating adina and the c	zero air and the colibratio	on gas. Record the readin
recision must b	e less than or equal to 10%	of the calibration gas value.		andradon gas as a percen	luge. The conoration
nstrument Seria	Number: 541	9		Cal Gas Concentration:	500ppm
ial	Zero Air Reading	Cal Gas Reading	I Cal Gas Co	nc -Cal Gas Beading	Research Time (research
1	-0.1	498			6
2		501		1	6
3		500	6		5
bration Precisi	on= Average Difference/Cal	Average Difference:	erform recalibration if	average difference is greater than]
ibration Precisi	on= Average Difference/Cal	Average Difference:	erform recalibration if	Faverage difference is greater than	10
ibration Precisi	on= Average Difference/Cal	Average Difference: -p. Gas Conc. X 100% = 100%-	erform recalibration if	Faverage difference is greater than 500 x 100%	10
ibration Precisi	on= Average Difference/Cal	Average Difference: Gas Conc. X 100% = 100% = %	erform recalibration if	Faverage difference is greater than	10
ibration Precisi	on= Average Difference/Cal	Average Difference: Gas Conc. X 100% = 100%- = %	erform recalibration if	Faverage difference is greater than	10
ibration Precisi n Sensitivity: <u> 1:</u> Cour	on= Average Difference/Cal	Average Difference:	erform recalibration if 3 / al 3: Counts	Faverage difference is greater than 500 x 100% Observed for the Span=	1762-4
ibration Precisi <u>n Sensitivity:</u> [<u>1:</u> Courte Counte	on= Average Difference/Cal its Observed for the Span=	Average Difference: Gas Conc. X 100% = 100%- = \% INBO67 SO8 5	al 3: Counters	500 x 100% Observed for the Span=	176254
ibration Precisi n Sensitivity: 11: Courte 2: Counte	ton= Average Difference/Cal	Average Difference:	al 3: Counters	average difference is greater than 500 x 100% Observed for the Span= 500served for the Zero=	176254
ibration Precisi n Sensitivity: [1: Courte 2: Count	ts Observed for the Span=	Average Difference: Pr Gas Conc. X 100% = 100%- = \% 178067 S085 1741164	al 3: Counts	Soo x 100% Observed for the Span=	176254
ibration Precisi n Sensitivity: 11: Courte 2: Counte Counte	ton= Average Difference/Cal nts Observed for the Span= ers Observed for the Zero= ts Observed for the Span= rs Observed for the Zero=	Average Difference: Pr Gas Conc. X 100% = 100%- = \% 178067 Tri 5085 174164 5077	al 3: Counts	i average difference is greater than 500 x 100% Observed for the Span= CObserved for the Zero=	176254 5073
ibration Precisi n Sensitivity: 11: Counte 2: Counte Monitoring Cali	ion= Average Difference/Cal nts Observed for the Span= ers Observed for the Zero= ts Observed for the Span= rs Observed for the Zero=	Average Difference: 	al 3: Counts	i average difference is greater than 500 x 100% Observed for the Span= CObserved for the Zero=	176254 5073
ibration Precisi n Sensitivity: 11: Counte 2: Counte Monitoring Cali Air	ion= Average Difference/Cal its Observed for the Span= ers Observed for the Zero= ts Observed for the Span= rs Observed for the Zero= ibration Check	Average Difference:	al 3: Counts	i average difference is greater than 500 x 100% Observed for the Span= CObserved for the Zero=	176254 5073
ibration Precisi n Sensitivity: 11: Counte 2: Counte Monitoring Cali Air ng:	ion= Average Difference/Cal ints Observed for the Span= ers Observed for the Zero= ts Observed for the Zero= rs Observed for the Zero= ibration Check	Average Difference: 	al 3: Counts Counters	Ti average difference is greater than 500 x 100% Observed for the Span= CObserved for the Zero=	176254 5073
ibration Precisi n Sensitivity: 11: Counte 2: Counte Monitoring Cali Air ng:	ion= Average Difference/Cal its Observed for the Span= ers Observed for the Zero= ts Observed for the Zero= rs Observed for the Zero= ibration Check CENTRATIONS CHECKS	Average Difference: [Gas Conc. X 100% = 100% = \% 100% % 100%	al 3: Counts	The second secon	176254
ibration Precisi n Sensitivity: 11: Counte 2: Counte Monitoring Cali Air ng: GROUND COM	ion= Average Difference/Cal its Observed for the Span= ers Observed for the Zero= ts Observed for the Zero= ibration Check CENTRATIONS CHECKS cription:	Average Difference: Gas Conc. X 100% = 100% = \% 100% %	al 3: Counts Counters	The second secon	176254 5073
ibration Precisi n Sensitivity: 11: Counte Counte 2: Counte Monitoring Cali Air ng: GROUND COM d Location Des vind Location D	ion= Average Difference/Cal ints Observed for the Span= ers Observed for the Zero= ts Observed for the Zero= ibration Check CENTRATIONS CHECKS cription:	Average Difference: "P Gas Conc. X 100% = 100%- = \% 178067 \$78067 \$78067 \$78067 \$77 \$085 \$77 \$0772 Cal Gas Reading: L	erform recalibration if 3 / al 3: Counters Counters Ppr Rea Rea	The second seco	176254 5073
ibration Precisi n Sensitivity: 11: Courte Counte 2: Counte Monitoring Cali Air ng: GROUND COM d Location Des vind Location C Wind	ton= Average Difference/Cal ton= Average Difference/Cal to Observed for the Span= to Observed for the Zero= to Observed for t	Average Difference: 	al 3: Counts Counters Counters Rea Rea	The series of th	176254 5073

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	a second second
· 가족 ''에너트' 제가 제가 가 전체 수가 제 수가 있는 것이 있는 것이 같이 있다. ''이 가 있는 것이 있는 것이 있는 것이 있는 것이 있는 것이 있다. ''이 있는 것이 없는 것이 있는 것이 있는 것이 있	
	- man - 41 - 21 単の構成の語() - 2-

		CALIDOATION AS			
		CALIBRATION AT	VD PERTINEP		
Date:	7-25-24		Site Name:	Niew By	
Inspector(s):	Alfred -	Jame Z	Instrument:	TVA 2020	
WEATHER OBSERV.	ATIONS			-	
	2	Wind		Barometric 🕤 🚱 🥿	
Wind Speed:	ИРН	Direction: 5W		Pressure: 2 1. 8	▶ "Hg
Air	ev	General Weathe	er		
lemperature:	> 6 °F	Conditions	s: Chroy	 1 	
CALIBRATION INFOR	MATION				
Pre-monitoring Calibra	ation Precision Check				
Queendus C. I''					
Procedure: Calibrate the	he instrument. Make a	total of three measuremen	nts by alternating	zero air and the calibratio	on gas. Record the readir
and calculate the avera	age algebraic differenc than or equal to 10% or	e between the instrument	reading and the c	alibration gas as a percer	tage: The calibration
neusion mast de less (r the cultoration gas value.			
nstrument Serial Num	ber <u>236</u>	4		Cal Gas Concentration:	500ppm
rial	Zero Air Reading	Cal Gas Reading	Cal Gas Co	ncCal Gas Reading	Response Time (seco
1	-0.1	501	1		7
3	-0.1	500	0		7
ibration Precision- Au	OF755 Difference (Cal	Tas Casa X 100%	*Perform recalibration il	average difference is greater than	10
libration Precision= Av	verage Difference/Cal C	Sas Conc. X 100%	"Perform recalibration il	average difference is greater than	10
libration Precision= Av	verage Difference/Cal C	5as Conc. X 100% = 100%	*Perform recalibration il	average difference is greater than 500 x 100%	10
libration Precision= Av	erage Difference/Cal C	Gas Conc. X 100% = 100%- = 00000	"Perform recalibration il 4 6 /	average difference is greater than	10
libration Precision= Av n Sensitivity:	erage Difference/Cal C	5as Conc. X 100% = 100%- = 99.68	"Perform recalibration il 4 6 /	average difference is greater than	10
libration Precision= Av n Sensitivity: <u>Il 1:</u>	erage Difference/Cal C	5as Conc. X 100% = 100%- = 99.88	"Perform recalibration il 4 (5 / % [<u>Frial 3:</u>	average difference is greater than	10
libration Precision= Av n Sensitivity: <u>Il 1:</u> Counts Obs	verage Difference/Cal C	5as Conc. X 100% = 100%- = 99.888	"Perform recalibration il () % <u>[Fial 3:</u> Counts	overage difference is greater than 500 x 100% Observed for the Span=	19
libration Precision= Av n Sensitivity: <u>Il 1:</u> Counts Obs Counters Obs	verage Difference/Cal C served for the Span=	5as Conc. X 100% = 100%- = 99.888 144596	"Perform recalibration il () % Trial 3: Counts Counters	overage difference is greater than 500 x 100% Observed for the Span= Observed for the Zero=	145-355- 4154
libration Precision= Av n Sensitivity: <u>11:</u> Counts Obs <u>Counters Obs</u> 2: Counts Obse	verage Difference/Cal C served for the Span=	5as Conc. X 100% $= 100%$ $= 99.886$ $100%$ $100%$ $= 99.866$ $100%$ $= 100%$	"Perform recalibration il 4 6 / % <u>Frial 3:</u> Counts <u>Counters</u>	overage difference is greater than 500 x 100% Observed for the Span= Observed for the Zero=	145-355- 41/54
libration Precision= Av n Sensitivity: <u>l 1:</u> Counts Obs <u>Counters Obs</u> 1 <u>2:</u> Counts Obse	verage Difference/Cal C served for the Span= served for the Zero=	5as Conc. X 100% = 100%- = 99.88 143.720 143.720	"Perform recalibration il 4 6 / % T <u>irial 3:</u> Counts Counters	overage difference is greater than 500 x 100% Observed for the Span= Observed for the Zero=	19 145-355- 4154
libration Precision= Av n Sensitivity: <u>11:</u> Counts Obs <u>Counters Obs</u> <u>Counts Obse</u>	verage Difference/Cal C served for the Span= served for the Zero= erved for the Span= erved for the Span=	5as Conc. X 100% = 100%- = 99.88 143.720 41.53	"Perform recalibration il (6) % <u>Frial 3:</u> Counts <u>Counters</u>	overage difference is greater than 500 x 100% Observed for the Span= Observed for the Zero=	145-355- 4154
libration Precision= Av n Sensitivity: <u>I 1:</u> Counts Obs <u>Counters Obse</u> <u>Counters Obse</u> Monitoring Calibration	verage Difference/Cal C served for the Span= served for the Zero= erved for the Zero= erved for the Zero= n Check	5as Conc. X 100% = 100%- = 99.88 143.720 143.720 41.53	"Perform recalibration il (6) % <u>Frial 3:</u> Counts <u>Counters</u>	overage difference is greater than 500 x 100% Observed for the Span= Observed for the Zero=	145-355- 4154
libration Precision= Av In Sensitivity: Il 1: Counts Obse Counters Obse Counters Obse Monitoring Calibration Air	verage Difference/Cal C served for the Span= served for the Zero= erved for the Zero= erved for the Zero=	5as Conc. X 100% = 100%- = 99.88 100%- = 99.88 100%- = 99.88 100%- = 100%- = 100%-	"Perform recalibration il () () () () () () () () () ()	overage difference is greater than 500 x 100% Observed for the Span= Observed for the Zero=	19 145-355- 4154
libration Precision= Av In Sensitivity: al 1: Counts Obse Counters Obse Counters Obse Counters Obse Monitoring Calibration Air ing:	verage Difference/Cal C served for the Span= served for the Zero= erved for the Zero= n Check	Eas Conc. X 100% = 100%- = 99.888 143.796 143.720 145.7200 145.7200 145.72	"Perform recalibration il <u>4</u> % T <u>rial 3:</u> Counters <u>Counters</u>	n n n n	19 <u>145-355-</u> 4154
libration Precision= Av In Sensitivity: II 1: Counts Obse Counters Obse Counters Obse Counters Obse Monitoring Calibration Air ing: CONCENT	verage Difference/Cal C served for the Span= served for the Zero= erved for the Zero= n Check ppm RATIONS CHECKS	Eas Conc. X 100% = 100%- = 99.88 100%- = 99.88 100%- = 99.88 100%- = 100%- = 99.88 100%- = 100%- = 99.88 100%- = 100%- = 10	<pre>"Perform recalibration il """"""""""""""""""""""""""""""""""""</pre>	overage difference is greater than 500 x 100% Observed for the Span= Observed for the Zero=	19 145-355- 4154
libration Precision= Av In Sensitivity: II 1: Counts Obse Counters Obse Counters Obse Counters Obse Monitoring Calibration Air ing: CONCENT Ad Location Descriptio	verage Difference/Cal C served for the Span= served for the Zero= erved for the Zero= n Check ppm RATIONS CHECKS	Eas Conc. X 100% = 100%- = 99.88 100%- = 99.88 100%- = 99.88 100%- = 100%- = 99.88 = 100%- = 100%-	Perform recalibration il (() Counts Counters () Counters Counters	n ding: 3.7	19 <u>145-355-</u> с /5Ч
libration Precision= Av In Sensitivity: II : Counts Obs Counters Obse Counters Obse Counters Obse Counters Obse Monitoring Calibration Air ing: Counters Obse Counters Obse C	verage Difference/Cal C served for the Span= served for the Zero= erved for the Zero= n Check ppm RATIONS CHECKS	Eas Conc. X 100% = 100%- = 99.88 143.720 413.720 413.720 Cal Gas Reading: 143.720 145.7200 145.72000 145.7200000000000000000000000000000000	Perform recalibration il (() () () () () () () () () (The second seco	19 <u>145-355-</u> <u>с /54</u> рт
libration Precision= Av	verage Difference/Cal C served for the Span= served for the Zero= erved for the Zero= n Check ppm RATIONS CHECKS	Eas Conc. X 100% = 100%- = 99.88 143.720 143.720 4133 Cal Gas Reading: flore grid	*Perform recalibration il <u>(()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>()</u> <u>(</u>	n ding: <u>3.7</u> p ding: <u>3.4</u> p	19 <u>IYS-355</u> <u>CJ/SY</u> рт
Iibration Precision= Av	verage Difference/Cal C served for the Span= served for the Zero= erved for the Zero= n Check ppm RATIONS CHECKS	5as Conc. X 100% = 100%- = 99.88 1008- 99.88 1008- 99.88 1008- 99.88 1008- 99.88 1008- 99.88 1008- 99.88 1008- 99.88 1008- 99.88 1008- 99.88 1008- 19.88 1008- <td< td=""><td>Perform recalibration il</td><td>The served for the Spane of th</td><td>IIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIII</td></td<>	Perform recalibration il	The served for the Spane of th	IIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIII

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State Barrie C. Leven and Sugar and Sugar Barriers and an and an and and and the

		10.1	the second states of the secon		
		SURFACE EMISSI	ONS MONITORING	2	
	3 . ()	CALIBRATION AN	D PERTINENT DAT	A	
Date	9.25.24		Site Name:	enby	
inspector(s):	A.O.G. Ila		Instrument:	020	
WEATHER OBS	SERVATIONS				
Wind Speed	2 мрн	Wind Direction: SW	Barome Press	etric ure: 29.8.5	инд
Air Temperature:	58 °F	General Weather Conditions	Partly Cloudy		
CALIBRATION I	NFORMATION		(/		
Pre-monitoring (Calibration Precision Check				
Procedure Calibi and calculate the precision must be Instrument Serial	rate the instrument. Moke a average algebraic difference e less than or equal to 10% of Number:	total of three measuremen e between the instrument r the calibration gas value.	ts by alternating zero air a reading and the calibration Cal Gas	nd the calibration gas as a percent Concentration:	agas. Record the reading age. The calibration 500ppm
Trial	Zero Air Reading	Cal Gas Reading		Reading (Rosponso Timo (seese
1		LI98	2	is Keauing	s
2	Ö	500	ô		6
3	-01	500	D		4
		= 100%	/500 x 100)%	
		= 44.88 %	6		
an Sensitivity:			states.		
Coun	ts Observed for the Span=	153156	Counts Observe	d for the Span=_	149996
Counte	ers Observed for the Zero=	4019	Counters Observe	d for the Zero=	4001
Coun	ts Observed for the Span=	150568			
Counte	rs Observed for the Zero=	3936			
st Monitoring Cali	bration Check				
o Air	10	Cal Gas			
ıding:	ppm	Reading:	Scc ppm		
CKGROUND CO	VCENTRATIONS CHECKS	1 .			
vind Location Des	cription:	lare	Reading:	<u>3.7</u> pr	om
vnwind Location (Description.	grid	Reading:	<u>8.9</u> pr	m
es: Win exce mete	d speed averages were obse eded 20 miles per hour. No corological conditions were	rved to remain below the a rainfall had occurred with within the requested altern	alternative requested 10 m in the previous 24 hours of natives of the LMR requirer	iles per hour and the monitoring e nents on the abo	no instantaneous speeds event, Therefore, site we mentioned date,

to to

1.0		SURFALE EMISS	IONS MONT	IUKING IT DATA	
Date	9.25.20		Site Name	News	
Inspector(s)	C. Brown		Instrument:	TVA 2020	
WEATHER OB	SERVATIONS				
Wind Speed		Wind Direction: 500		Barometric Pressure: 29-8	2 _{"Hg}
Air Temperature:	<u>58</u> °F	General Weathe Conditions	Partyc	lady	
CALIBRATION I	NFORMATION		5 (ſ	
Pre-monitoring (Calibration Precision Check				
Procedure Calib and calculate the precision must be nstrument Serial	rate the instrument., Make a e average algebraic difference e less than or equal to 10% o Number:	total of three measurements between the instrument of the calibration gas value.	nts by alternating reading and the c	zero air and the calibratic alibration gas as a percen Cal Gas Concentration	on gas. Record the reading tage. The calibration 500ppm
rial	Zero Air Reading	Cal Gas Reading	Cal Gas Co	onc -Cal Gas Reading	Response Time (second
1	-0.1	500	(3	7
2	~6.1	502		2	6
	S.2.	083 CONC. X 100%			
	81.	= 100%-	<u> </u>	/500 x 100%	ž
	31. 1	= 100%- = 97.8	%	/500 x 100%	ð
an Sensitivity:		= 100%- = 97.8	%	/500 x 100%	ž
an Sensitivity: al 1: Cour	nts Observed for the Span=	= 100%- = 99.8 117800	% T <u>rial 3:</u> Count	/500 × 100% s Observed for the Span=	1235-12
an Sensitivity: al 1: Courte	nts Observed for the Span=_ ers Observed for the Zero=	= 100%- = 99.8 [17800 -/900	% T <u>rial 3:</u> Count	/500 × 100% s Observed for the Span= s Observed for the Zero=	123512 4870
an Sensitivity: al 1: Courte Counte l 2: Coun	nts Observed for the Span= ers Observed for the Zero= ts Observed for the Span=_	= 100%- = 99.8 [17800 [17800 [20]]77	% Trial 3: Count Counter	/500 x 100% s Observed for the Span= s Observed for the Zero=	123512 4870
an Sensitivity: al 1: Cour Counte l 2: Counte Counte	nts Observed for the Span= ers Observed for the Zero= ts Observed for the Span= rs Observed for the Zero=	= 100%- = 99.8 [17800 [17800 [20]] 120]] [% T <u>rial 3:</u> Count Counter	/500 x 100% s Observed for the Span= s Observed for the Zero=	123512 4870
an Sensitivity: al 1: Counte Counte l 2: Counte : Monitoring Cal	nts Observed for the Span= ers Observed for the Zero= ts Observed for the Span= <u>rs Observed for the Zero=</u> ibration Check	= 100%- = 99.8 [17800 [17800 [20] [20] [20] [20] [20] [20] [20] [2	% T <u>rial 3:</u> Count Counter	/500 x 100% s Observed for the Span= s Observed for the Zero=	123512 4870
an Sensitivity: al 1: Courte Counte Counte Counte Counte Air Air	its Observed for the Span= ers Observed for the Zero= ts Observed for the Span= rs Observed for the Zero= ibration Check	= 100%- = 99.8 [117800 [17800 [20] [20] [20] [20] [20] [20] [20] [2	% Trial 3: Counter Counter	/500 x 100% s Observed for the Span= s Observed for the Zero=	123512 4870
an Sensitivity: al 1: Courte Counte	nts Observed for the Span= ers Observed for the Zero= ts Observed for the Span= rs Observed for the Zero= ibration Check	= 100%- = 99.8 [177800 [177800 [20] [20] [20] [20] [20] [20] [20] [2	% Trial 3: Count Counter	/500 x 100% s Observed for the Span= s Observed for the Zero=	123512 4870
an Sensitivity: al 1: Counte	nts Observed for the Span= ers Observed for the Zero= ts Observed for the Span= rs Observed for the Zero= ibration Check <u>Q</u> ppm NCENTRATIONS CHECKS scription:	= 100%- = 99.8 [17800 [17800 [20] [20] [20] [20] [20] [20] [20] [2	N Trial 3: Count Counter	$\frac{1}{500 \times 100\%}$ s Observed for the Span= s Observed for the Zero=	1235-12 4870
an Sensitivity: al 1: Courte Counte	ats Observed for the Span= ers Observed for the Zero= ts Observed for the Span= rs Observed for the Zero= ibration Check ppm NCENTRATIONS CHECKS scription: Description:	= 100%- = 99.8 [117800 [17800 [20] [20] [20] [20] [20] [20] [20] [2	% Trial 3: Counter Counter	$\frac{7500 \times 100\%}{100\%}$ s Observed for the Span= s Observed for the Zero=	1235-12 U 870

SER BARREN AND A SCHART REVELOSATION AND A STREET AND A

1		CALIBRATION AN	ID PERTINE	I UNING	
Date:	calzsizu		Site Name:	Apurbar	
Inspector(s)	E D	n C. bean		TWO DG	
		Cirzon	instrument:		
WEATHER OBS	ERVATIONS				
Wind Speed:	МРН	Wind Direction:		Barometric Pressure: 24.8	3 "на
Air Temperature:	58_*	General Weather Conditions	cloudy		
CALIBRATION IN	VFORMATION		2		
Pre-monitoring Ca	alibration Precision Check				
nstrument Serial i	less than or equal to 10%	of the calibration gas value.	eauny ana the c	Cal Gas Concentration	500ppm
rial	Zero Air Reading	Cal Gas Reading	Cal Gas Co	oncCal Gas Reading	Response Time (second
2	0				2
3	~ B	498		7	
libration Precisio	n= Average Difference/Cal	Average Difference: Gas Conc. X 100%	Perform recalibration i	f average difference is greater than) 10
libration Precision In Sensitivity:	n= Average Difference/Cal	Average Difference: [Gas Conc. X 100% = 100%- = 99.74%	Perform recalibration (f average difference is greater than /500 x 100%] n 10
libration Precision In Sensitivity: al 1: County	n= Average Difference/Cal	Average Difference: Gas Conc. X 100% = 100%- = 99.7% 144080	Perform recalibration i 1.3 6 <u>rial 3:</u>	f average difference is greater than /500 x 100%] 10 14/5148
libration Precision in Sensitivity: al 1: Count:	n= Average Difference/Cal	Average Difference: Gas Conc. X 100% = 100%- = 99.7% 144080	Perform recalibration i 1.3 6 rial 3: Count:	f average difference is greater than /500 x 100% s Observed for the Span=	145148
libration Precision in Sensitivity: al 1: Counter: L2:	n= Average Difference/Cal s Observed for the Span= s Observed for the Zero=	Average Difference: Gas Conc. X 100% = 09.7% 144080 5300	Perform recalibration i Perform recalibration i in 3 6 <u>rial 3:</u> Counter Counter	f average difference is greater than /500 x 100% s Observed for the Span= s Observed for the Zero=	145148 5249
libration Precision in Sensitivity: al 1: Counter: <u>2:</u> Counts	n= Average Difference/Cal s Observed for the Span= s Observed for the Zero= Observed for the Span=	Average Difference: Gas Conc. X 100% = 100%- = 99.7% 144080 5300 145116	Perform recalibration i 1.3 6 rial 3: Counter	f average difference is greater than /500 x 100% s Observed for the Span= s Observed for the Zero=	145148 5249
libration Precision in Sensitivity: al 1: Counter: <u>l 2:</u> Counters Counters	n= Average Difference/Cal s Observed for the Span= s Observed for the Zero= Observed for the Span= Observed for the Zero=	Average Difference: Gas Conc. X 100% = 09.7% 144080 5300 145116 5760	Perform recalibration i Perform recalibration i 6 6 <u>rial 3:</u> Counter	f average difference is greater than /500 x 100% s Observed for the Span= s Observed for the Zero=	145148 5249
libration Precision in Sensitivity: al 1: Counter: <u>I 2:</u> Counters Monitoring Calib	n= Average Difference/Cal s Observed for the Span= s Observed for the Zero= Observed for the Span= Observed for the Zero= ration Check	Average Difference: Gas Conc. X 100% = 0.9.71, 144080 5300 145116 5760	Perform recalibration i Perform recalibration i in 3 i counter Counter	f average difference is greater than /500 x 100% s Observed for the Span= s Observed for the Zero=] 145148 5249
libration Precision in Sensitivity: al 1: Counter: <u>1 2:</u> Counters Monitoring Calib Air ing:	n= Average Difference/Cal s Observed for the Span= <u>s Observed for the Zero=</u> Observed for the Span= <u>Observed for the Zero=</u> ration Check	Average Difference: Gas Conc. X 100% = 100%- = 9.9.7% 100%- = 0.9.7% 100%- = 0.9.7% 100%- = 0.9.7% 100%- = 0.9.7% 9 100%- = 0.9.7% 9 Cal Gas Reading: 5	Perform recalibration i 1.3 6 rial 3: Counter Counter	f average difference is greater than /500 x 100% s Observed for the Span= s Observed for the Zero=	145148 5249
libration Precision in Sensitivity: al 1: Counter: L2: Counters Monitoring Calib Air ing: CGROUND CONC	n= Average Difference/Cal s Observed for the Span= s Observed for the Zero= Observed for the Zero= ration Check ppm CENTRATIONS CHECKS	Average Difference: Gas Conc. X 100% = 100%- = 9.9.7% 100%- = 9.9.7% 100%- = 100%- =	Perform recalibration i 1.3 6 rial 3: Counter 6 02 pp	f average difference is greater than /500 x 100% s Observed for the Span= s Observed for the Zero=	145148 5249
libration Precision in Sensitivity: al 1: Counter: L2: Counters Monitoring Calib Air ing: CGROUND CONC	n= Average Difference/Cal s Observed for the Span= s Observed for the Zero= Observed for the Zero= ration Check ppm CENTRATIONS CHECKS ription:	Average Difference: Gas Conc. X 100% = 100%- = 9.9.7% 144080 5300 145116 5300 Cal Gas Reading: 5	Perform recalibration i 1.3 6 rial 3: Counter 6 02 pp Re	f average difference is greater than /500 x 100% s Observed for the Span= s Observed for the Zero=] 145148 5249
libration Precision in Sensitivity: al 1: Counter: Counter: Counters Monitoring Calib Air ing: CGROUND CONC nd Location Description wind Location Description	n= Average Difference/Cal s Observed for the Span= s Observed for the Zero= Observed for the Zero= Observed for the Zero= ration Check ppm CENTRATIONS CHECKS ription:	Average Difference: Gas Conc. X 100% = 100%- = 9.9.7% 144080 5300 145116 5300 Cal Gas Reading: 5 /// Grid	Perform recalibration i 1.3 6 rial 3: Counter 6 6 02 pp Re Re	f average difference is greater than /500 x 100% s Observed for the Span= s Observed for the Zero= m ading: 3.7 s 3.4 p] 145148 5249 ррт ррт

WER DASSING - FRANKER FRANKER FRANKER BARREN DASSAS - FRANKER -

L					
		SURFACE EMISS	IONS MONITO	DRING	
. [CALIBRATION AN	ND PERTINENT	T DATA	
Date:	9-24-24		Site Name:	NEWBU	
inspector(s):	Antrea		Instrument:	TVA 2020	
WEATHER O	BSERVATIONS DON	Gibson			
Wind Spee	ed: <u>3</u> мрн	Wind Direction: <u>////E</u>		Pressure: 29.7	
A Temperatur	Nir e: <u>62</u> °F	General Weathe Conditions	Sunny		
CALIBRATION	INFORMATION				
Pre-monitoring	Calibration Precision Che	ck			
Procedure Cali	brate the instrument, Mo be average glashraic diffe	ke a total of three measuremer	nts by alternating ze	ero air and the calibratic	on gas. Record the reading
precision must	be less than or equal to 10	nence between the instrument i 0% of the calibration gas value.	reduing and the call	oration gas as a percen	tage The calibration
Instrument Soci	al Number: 271	64			
		<u> </u>		cal Gas Concentration:	500ppm
Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Cond	-Cal Gas Reading	Response Time (second
2	-0.1	502	L		<u>†</u>
		503			
3		505			
3 Calibration Precis	sion= Average Difference/	Average Difference:	Perform recalibration if av	verage difference is greater than	10
3 Calibration Precis	Ision= Average Difference/(Average Difference: [Cal Gas Conc. X 100% = 100%-	Perform recalibration if av	verage difference is greater than 00 x 100%] 10
3 Calibration Precis	Ision= Average Difference/0	Average Difference: [Cal Gas Conc. X 100% = 100%- = 9	Perform recalibration if av	verage difference is greater than] 10
3 Calibration Precis	sion= Average Difference/(Average Difference: Cal Gas Conc. X 100% = 100%- = 9	Perform recalibration if av	verage difference is greater than	10
3 Calibration Precis Span Sensitivity: Trial 1:	sion= Average Difference/	Average Difference: Cal Gas Conc. X 100% = 100%- = 9	Perform recalibration if av ■Perform recalibration if av /50 %	verage difference is greater than	10
3 Calibration Precis Span Sensitivity: Trial 1: Cou	sion= Average Difference/u ints Observed for the Spar	Average Difference: Cal Gas Conc. X 100% = 100% = 9 n= <u>198236</u>	recalibration if av Perform recalibration if av /50 % <u>Frial 3:</u> Counts O	verage difference is greater than 00 × 100% 0bserved for the Span=	147754
3 Calibration Precis Span Sensitivity: Trial 1: Court	ints Observed for the Spar	Average Difference: Cal Gas Conc. X 100% = 100%- = 9 n= <u>/98236</u> p= <u>1998236</u> 1 1 1 1 1 1 1 1 1 1 1 1 1	Ferform recalibration if av /50 % [<u>rial 3:</u> Counts O Counters C	verage difference is greater than 00 x 100% 0bserved for the Span= 0bserved for the Zero=	1 10 147754 4197
3 Calibration Precis Span Sensitivity: Trial 1: Cou Coun Trial 2: Cou	I sion= Average Difference/ Ints Observed for the Spar ters Observed for the Zero nts Observed for the Span	Average Difference: Cal Gas Conc. X 100% = 100%- = 9 n= <u>/98236</u> p= <u>198236</u> 1 1 1 1 1 1 1 1 1 1 1 1 1	Ferform recalibration if av /SO % f <u>rial 3:</u> Counts O Counters C	verage difference is greater than 00 x 100% 0bserved for the Span= 0bserved for the Zero=	1 10 147754 4197
3 Calibration Precis Span Sensitivity: Trial 1: Cou Trial 2: Cou Count	sion= Average Difference/ ints Observed for the Spar ters Observed for the Zero nts Observed for the Span ers Observed for the Span	Average Difference: Cal Gas Conc. X 100% = 100%- = 2 n= <u>/98236</u> = <u>/9849</u> = <u>/9849</u> = <u>/9849</u> = <u>/9849</u> = <u>/9849</u> = <u>/9849</u>	Ferform recalibration if av /SO % [<u>Frial 3:</u> Counts O <u>Counters C</u>	verage difference is greater than 00 x 100% 0bserved for the Span= 0bserved for the Zero=	1 10 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
3 Calibration Precis Span Sensitivity: Trial 1: Cou <u>Count</u> Trial 2: Cou	sion= Average Difference/ ints Observed for the Spar ters Observed for the Zero nts Observed for the Span ers Observed for the Zero	Average Difference: Cal Gas Conc. X 100% = 100%- = 2 n= <u>/48236</u> 1 1 1 1 1 1 1 1 1 1 1 1 1	Ferform recalibration if av /50 % [<u>rial 3:</u> Counts O <u>Counters C</u>	Perage difference is greater than 00 x 100% 00 bserved for the Span= 000000000000000000000000000000000000	1 10 10 1977 197 197
3 Calibration Precis Span Sensitivity: Trial 1: Cou <u>Count</u> Trial 2: Cou <u>Count</u>	I sion= Average Difference/ ints Observed for the Spar ters Observed for the Zero nts Observed for the Span ers Observed for the Zero flibration Check	Average Difference: Cal Gas Conc. X 100% = 100%- = 9 100%- = 9 100%- = 100%- = 100%- = 100%- = 100%- = 100%- = 100%- = 100%- = 9 100%- = 100%- = 9 100%- = 9 100%- 100	Ferform recalibration if av /50 % firial 3: Counts O Counters C	verage difference is greater than 00 × 100% 0bserved for the Span= 0bserved for the Zero=	1 10 19 19 19 19 7
3 Calibration Precis Span Sensitivity: Trial 1: Cou Count Trial 2: Cou Count Post Monitoring Ca Zero Air	sion= Average Difference/ ints Observed for the Spar ters Observed for the Zero nts Observed for the Span ers Observed for the Zero alibration Check	Average Difference: Cal Gas Conc. X 100% = 100%- = 2 100%- = 2 100%- = 100%- = 2 100%- = 100%- = 2 100%- = 2 100%- = 2 2 2 2 2 2 2 2 2 2 2 2 2 2	Perform recalibration if av /50 % <u>[rial 3:</u> Counts O <u>Counters C</u>	verage difference is greater than 00 x 100% 0bserved for the Span= 0bserved for the Zero=	1 10 19 19 19 19 19 19 2
Calibration Precis Span Sensitivity: Trial 1: Cou Count Trial 2: Cou Count Post Monitoring Ca Zero Air Reading:	sion= Average Difference/ ints Observed for the Spar ters Observed for the Zero nts Observed for the Span ers Observed for the Zero alibration Check	Average Difference: Cal Gas Conc. X 100% = 100%- = 2 n= <u>/48236</u> 1 - <u>148044</u> = <u>148044</u> = <u>148044</u> = <u>148044</u> Cal Gas Reading:	Perform recalibration if av /50 % Frial 3: Counts O Counters C	Perage difference is greater than 00 x 100% 00 bserved for the Span= 00 bserved for the Zero=	1 10 10 197 197 197
3 Calibration Precis Span Sensitivity: Trial 1: Cou Trial 2: Cou Count Post Monitoring Ca Zero Air Reading: SACKGROUND CC	sion= Average Difference/ ints Observed for the Spar ters Observed for the Zero nts Observed for the Zero ers Observed for the Zero libration Check MCENTRATIONS CHECK	Average Difference: Cal Gas Conc. X 100% = 100%- = 2 n= <u>/48236</u> 1 - <u>148044</u> = <u>148044</u> = <u>148044</u> = <u>148044</u> = <u>148044</u> Cal Gas Reading:	Perform recalibration if av /50 % Frial 3: Counts O Counters C	Perage difference is greater than 00 x 100% 00 bserved for the Span= 00 bserved for the Zero=	1 10 10 19 19 19 19 19 19 19 19 19 19 19 19 19
3 Calibration Precis Span Sensitivity: Trial 1: Court Trial 2: Court Post Monitoring Calibration Zero Air Reading: BACKGROUND CC Upwind Location De	sion= Average Difference/o ints Observed for the Spar ters Observed for the Zero nts Observed for the Zero nts Observed for the Zero elibration Check MCENTRATIONS CHECK	Average Difference: Cal Gas Conc. X 100% = 100%- = 2 n= <u>/48236</u> n= <u>/48236</u> 1 1 1 1 1 1 1 2 2 2 2 2 2 2 2 2 2 2 2 2	Perform recalibration if av /S0 % Frial 3: Counts O Counters C	ing: 2,2,2 p	рт
3 Calibration Precis Span Sensitivity: Trial 1: Court Trial 2: Court Post Monitoring Ca Zero Air Reading: BACKGROUND CC Upwind Location De Downwind Location	sion= Average Difference/d ints Observed for the Spar ters Observed for the Zero nts Observed for the Zero nts Observed for the Zero alibration Check INCENTRATIONS CHECK escription: Description:	Average Difference: Cal Gas Conc. X 100% = 100%- = 2 n= <u>/48236</u> 1 1 1 1 1 1 1 1 1 1 1 1 1	Perform recalibration if av /50 % Frial 3: Counts O Counters O Counters O Readi Readi	ing: 32 p] 10 <u>/ Ч 7 75 Ч</u> <u> Ч I 9 7</u> рт рт

	S	URFACE EMISSIC	NS MONI	TORING	
	C.	ALIBRATION AND) PERTINE	NT DATA	
ate:	9-24.24		Site Name:	Newby	
spector(s)	Abrian De	elgodillo	Instrument	TVA 2020	
EATHER OBS	ERVATIONS				
Wind Speed:	ЭМРН	Wind Direction:	-	Barometric Pressure: 29.7	-7 "Hg
Air Temperature:	<u>C2</u> *	General Weather Conditions	Most	lysunny	
ALIBRATION I	NFORMATION				
re-monitoring (Calibration Precision Check				tion and Becord the readings
rocedure ⁻ Calib nd calculate th	prate the instrument. Make a to e average algebraic difference	otal of three measureme between the instrument the calibration gos value.	nts by alterna reading and t	ting zero air and the calibro he calibration gas as a pero	entage. The calibration
recision must b	le less than or equal to 10% of the			Cal Gas Concentratio	on: 500ppm
istrument Seria			Ical G	as ConcCal Gas Reading	Response Time (seconds)
rial	Zero Air Reading	Cal Gas Reading		2	2
1	-0.1	501			- U
2	2	501			
alibration Prec	ision= Average Difference/Cal (Gas Conc. X 100% = 1009	=Perform recallb	/500 x 100%	*
Consitivity		= 99.7	1 %		
rial 1:	·	148776	Trial 3:	Counts Observed for the S	ipan= 1016100
C	ounts Observed for the Spon	4032	(Counters Observed for the	Zero= 7875
Co [rial 2:	ounters Observed for the Span=	147772	2		
Co	unters Observed for the Zero=	3972			
Post Monitorin	g Calibration Check				
Zero Air Reading:	ppm	Cal Gas Reading:		mgg	
BACKGROUN	D CONCENTRATIONS CHECK	5			
Upwind Locatio	on Description:			Reading:	ppm
Downwind Loc	ation Description:			Reading	
Notes:	Wind speed averages were of exceeded 20 miles per hour	observed to remain belo No rainfall had occurr were within the requeste	ow the alternal ed within the p ed alternatives	tive requested 10 miles per previous 24 hours of the m of the LMR requirements	on the above mentioned date

----. a a Gradina and water 1 Daster.

3	S	URFACE EMISSION	IS MONIT	ORING	
	CA	LIBRATION AND I	PERTINEN	I DAIA	e
)ate: _	9.24.24	Si	te Name:	Newby	
nspector(s)	Andrew S.	tone	istrument	TVA 2020	
VEATHER OBSE	RVATIONS			Bacometric	
Wind Speed:	Э МРН	Wind Direction: NNE		Pressure: 29.77	- "Hg
Air Temperature:	62 °F	General Weather Conditions:	Mostlys	Sonny	
CALIBRATION IN	FORMATION				
Pre-monitoring C	alibration Precision Check				n gas Record the readings
Procedure: Calibr and calculate the precision must be	rate the instrument. Make a to average algebraic difference b e less than or equal to 10% of ti	tal of three measurement petween the instrument re he calibration gas value.	s by alternative ading and the	e calibration gas as a percent	age. The calibration
Instrument Serial	Number: 1220)		Cal Gas Concentration:	Beconse Time (seconds)
	Zaro Air Roading	Cal Gas Reading	Cal Gas	ConcCal Gas Reading	Response nine (second)
frial		502	2		2
	-0.1	501		2	3
4	(2.1	6520		0	
Calibration Preci	sion= Average Difference/Cal G	5as Conc. X 100% = 100%- = 99.8	%	/500 x 100%	
Span Sensitivity:		10	Trial 3:		143852
<u>Trial 1:</u> Co	ounts Observed for the Span=	142312	(Counts Observed for the Spa	- 3844
Cou	nters Observed for the Zero=	3458	Co	ounters Observed for the zer	
<u>Trial 2:</u> Co	ounts Observed for the Span=	143438			
Cou	nters Observed for the Zero=				
Post Monitoring	Calibration Check				
Zero Air Reading:	ppm	Reading:	502	ppm	
BACKGROUND	CONCENTRATIONS CHECK	5		Reading	7 ppm
Upwind Location	n Description:	JINC 2419	_	Reading: 3.2	ppm
Downwind Loca	tion Description:	grie or	the alternativ	ve requested 10 miles per ho	our and no instantaneous speed
Notes:	Wind speed averages were c exceeded 20 miles per hour.	bserved to remain below No rainfall had occurred	within the pr	evious 24 hours of the moni of the LMR requirements on	toring event. Therefore, site the above mentioned date.

1		CALIDOATIAN AN	C DEPENDING	VININU Thata	
1	0	CALIBRATION AN	U PERTINEN	I DATA	
Date	9-26-24		Site Name:	Neulbas	
Inspector(s)	Allert	9 /	Instrument		
mapeeror(a)	- gigio	1 X an	mstrument	104 2020	
WEATHER OBS	ERVATIONS	to repet			
		Wind		Barometric	
Wind Speed:	МРН	Direction: 5	2	Pressure: 29. S	9 "Hg
Air		General Weather			
Temperature:	55 °F	Conditions:	summy		
CALIBRATION IP	VFORMATION				
Pre-monitoring Ca	alibration Precision Check				
Procedure Calibri	ate the instrument. Make a	a total of three measuremen	ts by alternating z	ero air and the calibration	on gas. Record the reading
and calculate the	average algebraic differen	ce between the instrument r	eading and the ca	libration gas as a percer	tage. The calibration
precision must be	less than or equal to 10% o	of the calibration gas value.			
nstrument Serial	Number:	05419		Cal Gas Concentration:	500ppm
1	Zero Air Reading	Cal Gas Reading	Cal Gas Cor	ncCal Gas Reading	Response Time (second
2	-6.1	501	1		1
3		Fair	-		1.4
libration Precisio	n= Average Difference/Cal	Average Difference:	Perform recalibration if a	average difference is greater thar] 10
libration Precisio	◆ on= Average Difference/Cal	Average Difference: Gas Conc. X 100% = 100%-	Perform recalibration if a	average difference is greater than $500 \times 100\%$] 10
libration Precisio	n= Average Difference/Cal	Average Difference; [Gas Conc. X 100% = 100% = 99 5 %	Perform recalibration if a	average difference is greater than 500 x 100%] 10
libration Precisio	n= Average Difference/Cal	Average Difference: [Gas Conc. X 100% = 100%- = 99.8% %	Perform recalibration if a	average difference is greater than 500 x 100%	1 4
Ilibration Precisio	n= Average Difference/Cal	Average Difference: Gas Conc. X 100% = 100%- = 99.88 %	Perform recalibration if a	average difference is greater than	1 4
Ilibration Precisio	on= Average Difference/Cal	Average Difference: Gas Conc. X 100% = 100%- = 99.88 % 172.416	Perform recalibration if a	average difference is greater than 500 x 100% Observed for the Span=	171 250
Ilibration Precisio	on= Average Difference/Cal	Average Difference: Gas Conc. X 100% = 100%- = 99.88 % 172.416	Perform recalibration if a /5 6 <u>rial 3:</u> Counts	average difference is greater than 500 x 100% Observed for the Span=	17/250
Ilibration Precisio	The Average Difference/Cal	Average Difference: Gas Conc. X 100% = 100%- = 99.88 % 172.416 531.7	Perform recalibration if a /5 6 rial 3: Counts Counters	average difference is greater than 500 x 100% Observed for the Span= Observed for the Zero=	171250 5374
Ilibration Precisio	ts Observed for the Span= rs Observed for the Span=	Average Difference: Gas Conc. X 100% = 100%- = 99.88 % 172.416 5317 170.191	Perform recalibration if a /5 6 <u>rial 3:</u> Counts Counters	average difference is greater than 500 x 100% Observed for the Span= Observed for the Zero=	171250 5374
Ilibration Precisio	ts Observed for the Span= rs Observed for the Zero=	Average Difference: Gas Conc. X 100% = 100%- = 99.88 % 172.416 5317 170.191 534.2	Perform recalibration if a /5 6 <u>rial 3:</u> Counts Counters	average difference is greater than 500 x 100% Observed for the Span= Observed for the Zero=	171250 5374
Ilibration Precisio	Average Difference/Cal ts Observed for the Span= rs Observed for the Zero= s Observed for the Span= s Observed for the Span= s Observed for the Zero=	Average Difference: Gas Conc. X 100% = 100%- = 99.88 % 172.416 531.7 170.191 5362	Perform recalibration if a /5 6 <u>rial 3:</u> Counts <u>Counters</u>	average difference is greater than 500 x 100% Observed for the Span= Observed for the Zero=	171250 5374
Ilibration Precisio	The Average Difference/Cal ts Observed for the Span= rs Observed for the Zero= s Observed for the Span= s Observed for the Zero= pration Check	Average Difference: Gas Conc. X 100% = 100%- = 99.88 % 172.416 531.7 170.19(5362	Perform recalibration if a /5 6 <u>rial 3:</u> Counts Counters	average difference is greater than 500 x 100% Observed for the Span= Observed for the Zero=	171250 5374
libration Precisio	ts Observed for the Span= rs Observed for the Zero= s Observed for the Zero= s Observed for the Zero=	Average Difference: Gas Conc. X 100% = 100%- = 99.88%% 1724/16 5317 17019(5362	Perform recalibration if a /5 6 rial 3: Counts Counters	average difference is greater than 500 x 100% Observed for the Span= Observed for the Zero=	171250 5374
Ilibration Precisio	ts Observed for the Span= rs Observed for the Zero= s Observed for the Zero= s Observed for the Zero= oration Check	Average Difference: Gas Conc. X 100% = 100%- = 99.88 % 172.416 531.7 170.19(5362 Cal Gas Reading:	Perform recalibration if a Perform recalibration if a /5 6 rial 3: Counters Counters	average difference is greater than 500 x 100% Observed for the Span= Observed for the Zero=	171250 5374
Ilibration Precisio	ts Observed for the Span= rs Observed for the Zero= s Observed for the Zero= s Observed for the Zero= oration Check	Average Difference: Gas Conc. X 100% = 100%- = 99.88 % 172.4/16 53/7 170.191 5362 Cal Gas Reading:	Perform recalibration if a Perform recalibration if a /5 Counts Counters ppr	average difference is greater than 500 x 100% Observed for the Span= Observed for the Zero=	171250 5374
Ilibration Precisio	ts Observed for the Span= rs Observed for the Span= s Observed for the Zero= s Observed for the Zero= oration Check	Average Difference: Gas Conc. X 100% = 100%- = 99.88 % 172.4/16 53/7 170.19(5362 Cal Gas Reading:	Perform recalibration if a Perform recalibration if a /5 6 rial 3: Counters Counters ppr	average difference is greater than 500 x 100% Observed for the Span= Observed for the Zero=	171250 5374
libration Precisio	an= Average Difference/Cal ts Observed for the Span= rs Observed for the Zero= s Observed for the Span= s Observed for the Zero= bration Check CENTRATIONS CHECKS Cription:	Average Difference: Gas Conc. X 100% = 100%- = 99.88 % 172 4/16 53/7 170 191 5362 Cal Gas Reading:	Perform recalibration if a Perform recalibration if a /5 Counts Counters ppr	average difference is greater than 500 x 100% Observed for the Span= Observed for the Zero=	1 4] 10 17/ 250 53 74
Ilibration Precisio	on= Average Difference/Cal ts Observed for the Span= rs Observed for the Zero= s Observed for the Zero= oration Check 7 ppm ICENTRATIONS CHECKS cription:	Average Difference: Gas Conc. X 100% = 100%- = 99.88 % 172 4/16 53/7 170 19(5362 Cal Gas Reading:	Perform recalibration if a Perform recalibration if a /5 6 rial 3: Counters Counters ppr Rea	average difference is greater than 500 x 100% Observed for the Span= Observed for the Zero= m ading:	1 7/ 250 5 3 74 5 3 79
Ilibration Precisio	an= Average Difference/Cal ts Observed for the Span= rs Observed for the Zero= s Observed for the Span= s Observed for the Zero= bration Check CENTRATIONS CHECKS cription: escription:	Average Difference: Gas Conc. X 100% = 100%- = 99.88 % 172 416 5317 170 191 5362 Cal Gas Reading: 100%- Cal Gas	Perform recalibration if a /5 6 7ial 3: Counters Counters ppr Rea Rea	average difference is greater than $500 \times 100\%$ Observed for the Span= <u>Observed for the Zero=</u> ading: <u>$2,7$</u> <u>3,2</u>	1 7/ 250 5 3 7-4 5 ppm
Ilibration Precisio	an= Average Difference/Cal ts Observed for the Span= rs Observed for the Zero= s Observed for the Span= s Observed for the Zero= bration Check 7 ppm ICENTRATIONS CHECKS cription: lescription:	Average Difference: Gas Conc. X 100% = 100%- = 99.88 % 172.4/16 53/7 170.19(5362 Cal Gas Reading: 100%- Cal Gas Reading: 100%- Cal Gas Reading: 100%- Cal Gas Reading: 100%- Cal Gas Reading: 100%- Cal Gas	Perform recalibration if a Perform recalibration if a (5) Counts Counters Counters ppr Rea Rea	average difference is greater than $500 \times 100\%$ Observed for the Span= Observed for the Zero= m ading: 27 ading: 312 iding: 312	1 7/ 250 53 74 53 79

WEST STATISTICS - Standard Environmental District - Filler

Site Name: New Years Site Name: New Years Site Name: New Years Wind Speed: 2 MPH Wind Directors: Not Content of three measurements by othermating set and the earlier and the earlier of the content of three measurements by othermating set and the earlier and the earlier of the content of three measurements by othermating set and the earlier and three otherwater is conditions: Support Arr Temperature: Start 's Conditions: Support Pre-montanting Califoration Precision Check Arr Temperature: Start 'S Conditions: Support Califoration Precision: Start Reading Califoration gas recurd the read and contains the versures difference by the contraction: Support Table 2000 Arr Reading Califoration gas recurd the read and contains the versures difference by the contraction: Support Table 2000 Arr Reading Califoration are contained three on the contraction: Support Table 2000 Arr Reading Califoration are contained to the contraction: Support Table 2000 Arr Reading Califoration are contained to the contraction: Support Table 2000 Arr Reading Califoration Final 2 Context Reading Califoration are contained to the contraction: Support Table 2000 Are reade for the Spane Strange Stra	10		SURFACE EIVIS	SIONS MONI	IORING NT DATA	
See Name:	Date	09/20/24			Alaul	
Instrument: TVA 3020 WEATHER OBSERVATIONS Wind Speed: Wind Speed: 2 Air General Weather Temperature: SLIPATON Pressure: Conditions: Submittion: Submittion Air General Weather Temperature: SLIPATON Pressure: Conditions: Submittion: Submittion: Procedure: Calibrate the instrument. Make a total of three measurements by obternating zero air and the colibration gas. Record the readiand on and the total of difference between the instrument reading and the calibration gas as our centration: Instrument: Still Procedure: Calibrate the instrument. Make a total of the calibration gas value. Instrument: Still Procedure: Calibrate the instrument. Still Zero Air Reading Calibrate the average light calibration argues value. Instrument: Still Calibrate the instrument the level to alibration argues value. Instrument: Still Calibrate the instrument to alibration argues value. Instrument: Still Calibrate the instrument to alibration argues value. Instrument: Still<	lesses to (a)	ACA LID.	la mal	Site Name:	NUNDY	
Wind Speed:	(inspector(s)	A Miles	MALLER	Instrument	TVA 2020	
Wind Speed: 2 MPH Wind Speed: Pressure: 24.87 THE Air General Weather Candition: Support Candition: Support The CALIBRATION INFORMATION Pre-monitoring Calibration Precision Check Candition: Support Calibration precision Check Procedure: Calibration everage ofgebraic difference between the instrument reading and the calibration gas: Record the reading activation in the instrument. Mole to lots of the calibration gas value. Calibration gas: Record the reading activation gas value. Instrument Serial Number: Support Calibration gas value. Support Support Trail Zero Air Reading Calibration gas value. Calibration gas status Support Instrument Serial Number: Support Calibration gas status Support Average Difference:	WEATHER OBS	ERVATIONS				
Wind speed:		2	Wind		Barometric	_
Air General Westher Calibration INFORMATION Pre-monitoring Calibration Precision Check Procedure: Calibration Precision Check Procedure: Calibration Precision Check Procedure: Calibration Precision Check Instrument Serial Number: 5420 Calibration average digebraic difference between the instrument reading and the calibration got as a percentage. The calibration precision must be less than or equal to 10% of the calibration got so a percentage. The calibration precision must be less than or equal to 10% of the calibration got so a percentage. The calibration precision must be less than or equal to 10% of the calibration got so a percentage. The calibration precision must be less than or equal to 10% of the calibration got so a percentage. The calibration precision must be less than or equal to 10% of the calibration got so a percentage. The calibration precision must be less than or equal to 10% of the calibration got so a percentage. The calibration precision must be less than or equal to 10% of the calibration got so a percentage. The calibration precision must be less than or equal to 10% of the calibration got so a percentage. The calibration precision must be less than or equal to 10% of the calibration got so a percentage. The calibration precision Average Difference/Cal Gas Conc. X 100% = 100%	wind Speed:	МРН	Direction:	_	Pressure: <u>29.8</u>	🖊 "нg
CALIBRATION INFORMATION Pre-manitoring Calibration Precision Check Procedure: Colibrate the instrument. Make a total of three measurements by olternating zero air and the calibration gas. Recard the read and calculate the average algebraic difference between the instrument reading and the calibration gas or a percentage. The calibration and calculate the average algebraic difference between the instrument reading and the calibration gas or a percentage. The calibration and calculate the average algebraic difference between the instrument reading and the calibration gas or a percentage. The calibration and calculate the average algebraic difference between the instrument reading and the calibration gas or a percentage. The calibration and calculate the average difference is subject to the calibration instrument. Souppm Instrument Serial Number: 54/20 2 0 2 0 2 0 2 0 2 0 2 0 2 0 2 0 2 0 3 0 Average Difference/Cal Gas Conc. X 100% = 100% 11/3 Counters Observed for the Span= 11/65/94 Counters Observed for the Span= 11/65/94 Counters Observed for the Zero= 3/12 0 Monitoring Calibrati	Air Temperature:	511 *	General Weath	er		
CALISMA FLOW INFORMATION Pre-monitoring Calibration Precision Check Procedure: Colibrate the instrument. Make a total of three measurements by alternating zero air and the colibration ges. Record the readination and collected the average digeorate difference between the instrument reading and the colibration ges is a percentage. The colibration ges wave color of the colibration ges are approved in the colibration ges are approved to 10% of the colibration ges value. Instrument Serial Number: 5420 Cal Gas Reading [Cal Gas Reading [Cal Gas Concentration: 500ppm] Trail Zero Air Reading Cal Gas Reading [Cal Gas Concentration: 500ppm] Trail Zero Air Reading Cal Gas Reading [Cal Gas Concentration: 500ppm] Average Difference: 44 a Cal Gas Concentration: 500ppm // 493 a O (1) 493 a O (1) 493 b O (1) 493 c Cal Gas Concentration: 500ppm // 493 c Cal Gas Concentration: 500ppm // 493 c Cal Gas Concentration: 500ppm // 500 x 100% a Sensitivity: a Sensitivity: a Sensitivity: a Sensitivity: a Sensitivity: a Counters Observed for the Span= 11 6594 counters Observed for the Zero= 3 6 1 2 Monitoring Calibration Check Air f Cal Gas			Condition	, sound	-	
Pre-monitoring Calibration Precision Check Procedure: Collbrate the instrument. Make a total of three measurements by alternating zera air and the collbration gas. Record the reac and calculate the average algebraic difference between the instrument reading and the collbration gas as percentage. The collbration gas as a percentage. instrument Serial Number: 5420 Cal Gas Concentration: 500ppm trait Zero Air Reading Cal Gas Reading ICal Gas Concentration: 500ppm trait Zero Air Reading Cal Gas Reading ICal Gas Concentration: 500ppm trait Zero Air Reading Cal Gas Reading ICal Gas Concentration: 500ppm trait Zero Air Reading Cal Gas Reading ICal Gas Concentration: 500ppm trait Zero Air Reading Cal Gas Reading ICal Gas Concentration: 1 2 O L493 Zero 1 2 3 O 1 Soco 1 2 1 2 Average Difference/Cal Gas Conc. X 100% = 1 3 Counters Observed for the Span= 1 500 x 100% Counters Observed for the Span= 1 SOLV8 Counters Observed fo	CALIBRATION IN	VFORMATION				
Proceedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Recard the reac and calculate the average digebraic 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: <u>5420</u> Cal Gas Concentration: <u>500ppm</u> Trial <u>Zero Air Reading</u> Cal Gas Reading <u>1Cal Gas Concentration</u> : <u>500ppm</u> Trial <u>Zero Air Reading</u> Cal Gas Reading <u>1Cal Gas Concentration</u> : <u>500ppm</u> Average Difference: <u>4</u> <u>4</u> <u>4</u> <u>4</u> <u>4</u> <u>4</u> <u>4</u> <u>4</u>	Pre-monitoring Ca	alibration Precision Check				
and collutions the average digebraic difference between the instrument reading and the calibration gas as a percentage. The calibration precisions must be less than or equal to 10% of the calibration gas value.	Procedure Calibro	ate the instrument. Make	a total of three measureme	nts by alternating	zero air and the calibratio	on gas Record the readii
Instrument Serial Number: SU20 Cal Gas Reading Cal Gas Concentration: S00ppm Trial Zero Air Reading Cal Gas Reading Cal Gas Conc. Cal Gas Reading Response Time (sec 2 01 493 2 7 3 00 1 493 7 Average Difference: Average Difference/Cal Gas Conc. X 100% = 100% 1.3 /500 x 100% = 9997 % an Sensitivity: all: Counts Observed for the Span= 1135540 Counts Observed for the Span= 15446 Counters Observed for the Span= 11694 Counters Observed for the Span= 1694 Counters Observed for the Span= 36.49 Monitoring Calibration Check Ar ing:	and calculate the precision must be	average algebraic differen less than or equal to 10%	nce between the instrument of the calibration ans value	reading and the c	alibration gas as a percen	tage. The calibration
Instruments Serial Adumber: Cal Gas Reading Cal Gas Concentration: S00ppm Irial Zero Air Reading Cal Gas Reading ICal Gas Concentration: S00ppm 1 O UPS Z Z Z 3 O UPS Z Z Z 3 O UPS Z Z Z 4 UPS Z Z Z Z 3 O UPS Z Z Z 4 UPS Z Z Z Z 3 O UPS Z Z Z 4 UPS Z Z Z Z 4 UPS Z Z Z Z 4 UPS Z Z Z Z Z 4 UPS Z Z Z Z Z 4 UPS UPS Z Z Z Z 4 Counts Observed for the Span= II GSQ 4 Counters Observed for the Zero= Z Z Z<		C1 0				
Image Zero Air Reading Cal Gas Reading ICal Gas ConcCal Gas Reading Response Time (sec 1	Instrument Serial r				Cal Gas Concentration	500ppm
2 0 103 7 3 0.1 500 7 Average Difference: "Perform recultaration if worge difference is greater than 10 Notice is the second of t	rial 1	Zero Air Reading	Cal Gas Reading	Cal Gas Co	ncCal Gas Reading	Response Time (seco
Average Difference: Average Difference: Perform recalibration if average difference is graster than 10 Average Difference/Cal Gas Conc. X 100% = 100%/500 x 100% = 99?? % In Sensitivity: all: Counts Observed for the Span=648 Counters Observed for the Span=648 Air ing: ppm Cal Gas Reading: ppm KGROUND CONCENTRATIONS CHECKS nd Location Description:649 wind Location Description:649 Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instancement of the content of the cont	2	00	498	7	5	7
Average Difference: 4 *Perform recalibration if average difference is greater than 10 Wild speed averages were observed to remain below the alternative requested 10 miles per hour and no instrumence or served for the spane: Average Difference/Cal Gas Conc. X 100% = 100%- = 100%- = 100%- = 100%- = 100%- = 100%- = 100%- = 100%- = 100%- = 100%- = 100%- = 100%- = 100%- = 100%- = 100%- = 100%- Counts Observed for the Spane 11 Counters Observed for the Zeroe 36/49 Counters Observed for the Zeroe 36/12 Monitoring Calibration Check Air Air Cali Gas ring:	3	-0.1	Sod	0		7
= 9977 % an Sensitivity: al 1: Counts Observed for the Span= 113540 Counters Observed for the Span= 11694 Counters Observed for the Zero= 3648 Counters Observed for the Zero= 3649 Counters Observed for the Zero= 3649 Counters Observed for the Zero= 3649 Counters Observed for the Zero= 3648 Counters Observed for the Zero= 3649 Counters Observed for the Zero= 364	libration Precision	- Average Difference/Ca	Car Cong X 100%			
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an Sensitivity: Trial 3: Counts Observed for the Span= 113540 Trial 3: Counts Observed for the Span= 115496 Counters Observed for the Zero= 3648 Counters Observed for the Zero= 3679 Counters Observed for the Zero= 3679 I 2: Counters Observed for the Span= 116599 Counters Observed for the Zero= 3679 Counters Observed for the Zero= 3672 Counters Observed for the Zero= 3679 Monitoring Calibration Check Cal Gas Reading: ppm KGROUND CONCENTRATIONS CHECKS Reading: SSS ppm Ind Location Description: Air Reading: 3.2 ppm Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous conditions Standard Stand	llibration Precisio	n≃ Average Difference/Ca	I Gas Conc. X 100%	1.3	500 x 100%	
Image: Counts Observed for the Span= Image: Solution Counters Observed for the Zero= Image: Co	libration Precision	n≃ Average Difference/Ca	I Gas Conc. X 100% = 100%- = 9917	1.3	500 x 100%	
Counters Observed for the Zero= 3648 Counters Observed for the Zero= 3649 12: Counts Observed for the Span= 116994 Counters Observed for the Zero= 3612 Monitoring Calibration Check Air Cal Gas Reading: ppm KGROUND CONCENTRATIONS CHECKS If or C Reading: 2.7 ppm wind Location Description: If or C Reading: 3.2 ppm Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous conditionants If or C Print Counters	an Sensitivity:	n≃ Average Difference/Ca	I Gas Conc. X 100% = 100%- = 9977	1.3	500 x 100%	
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Counters Observed for the Span= Counters Observed for the Zero= Monitoring Calibration Check Air ing: <u>-OL</u> ppm Cal Gas Reading: <u>SOS</u> ppm Concentrations checks Mul Location Description: <u>Airl</u> <u>Airl</u> Reading: <u>Sos</u> ppm Cal Gas Reading: <u>Sos</u> ppm Cal Gas Reading: <u>Sos</u> ppm Cal Gas Reading: <u>Sos</u> ppm Concentrations checks Cal Gas Reading: <u>Sos</u> ppm Concentrations checks Cal Gas Reading: <u>Sos</u> ppm Concentrations checks Cal Gas Reading: <u>Sos</u> ppm Concentrations checks Cal Gas Reading: <u>Sos</u> ppm	ilibration Precision an Sensitivity: al 1: Counters	n= Average Difference/Ca 5 Observed for the Span=	I Gas Conc. X 100% = 100%- = 9977 	<u>1.3</u> % Trial <u>3:</u> Counts	500 × 100% Observed for the Span=	115496
Counters Observed for the Zero= 2012 Monitoring Calibration Check Air Cal Gas ling:	alibration Precision an Sensitivity: al 1: Counts Counters	n= Average Difference/Ca s Observed for the Span= s Observed for the Zero=	I Gas Conc. X 100% = 100%- = 9977 113540 3648	1.3 / % T <u>rial 3:</u> Counts Counters	500 x 100% Observed for the Span= 5 Observed for the Zero=	115496 3619
Monitoring Calibration Check Air Cal Gas ling: -O() (ppm Reading: SOS ppm KGROUND CONCENTRATIONS CHECKS Ind Location Description: flore ewind Location Description: flore And Location Description: flore	alibration Precision an Sensitivity: al 1: Counts Counters I 2: Counts	n= Average Difference/Ca s Observed for the Span= s Observed for the Zero= Observed for the Span=	I Gas Conc. X 100% = 100%- = 9977 113540 3648 116994	1.3 % T <u>rial 3:</u> Counts Counters	500 x 100% Observed for the Span= Observed for the Zero=	115496 3619
Air Ling: <u>-OL</u> ppm Cal Gas Reading: <u>SOS</u> ppm KGROUND CONCENTRATIONS CHECKS Ind Location Description: <u>flore</u> Reading: <u>2.7</u> ppm Reading: <u>3.2</u> ppm Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous cond	alibration Precision an Sensitivity: al 1: Counts Counters Il 2: Counts Counters	n= Average Difference/Ca s Observed for the Span= s Observed for the Zero= Observed for the Span= Observed for the Zero=	I Gas Conc. X 100% = 100%- = 9977 113540 3648 11694 3678	1.3 % Trial 3: Counts Counters	500 x 100% Observed for the Span= Observed for the Zero=	115496 3619
Air Cal Gas ling: <u>-O((</u> ppm Reading: <u>)</u> ppm KGROUND CONCENTRATIONS CHECKS Ind Location Description: <u>flore</u> Reading: <u>2.7</u> ppm Invind Location Description: <u>Reading</u> : <u>3.2</u> ppm Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous conditions	alibration Precision an Sensitivity: al 1: Counters Counters Counters Counters	n= Average Difference/Ca s Observed for the Span= s Observed for the Zero= Observed for the Span= Observed for the Zero= ration Check	I Gas Conc. X 100% = 100%- = 9977 113540 3648 11694 3612	1.3 % Trial 3: Counts	500 x 100% Observed for the Span= Observed for the Zero=	115496 3619
KGROUND CONCENTRATIONS CHECKS Ind Location Description: Invind Location Description: I	alibration Precision an Sensitivity: al 1: Counters Counters Counters Counters Monitoring Calibr	n= Average Difference/Ca s Observed for the Span= s Observed for the Zero= Observed for the Span= Observed for the Zero= ration Check	I Gas Conc. X 100% = 100%- = 9977 113540 3648 11694 3612	<u>1.3</u> % T <u>rial 3:</u> Counts Counters	500 x 100% Observed for the Span= Observed for the Zero=	115496 3619
KGROUND CONCENTRATIONS CHECKS Ind Location Description: Image:	alibration Precision an Sensitivity: al 1: Counters Counters L2: Counters Monitoring Calibr Air	n= Average Difference/Ca s Observed for the Span= s Observed for the Zero= Observed for the Span= Observed for the Zero= ration Check	I Gas Conc. X 100% = 100%- = 9977 113540 3648 11694 3648 11694 3678 Cal Gas Reading:	1.3 % Trial 3: Counters	500 x 100% Observed for the Span= 5 Observed for the Zero=	115496 3619
Ind Location Description: Invind Location Description: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous spec	alibration Precision an Sensitivity: al 1: Counters Counters L2: Counters Monitoring Calibr Air	n= Average Difference/Ca s Observed for the Span= s Observed for the Zero= Observed for the Span= Observed for the Zero= ration Check	I Gas Conc. X 100% = 100%- = 9977 113540 3648 11694 3648 11694 3678 Cal Gas Reading:	<u>γ</u> % <u>Trial 3:</u> Counters Counters	500 x 100% Observed for the Span= Observed for the Zero=	115496 3619
wind Location Description: Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous spec	an Sensitivity: al 1: Counters Counters Counters Counters Monitoring Calibr Air Air KGROUND CONC	n= Average Difference/Ca s Observed for the Span= s Observed for the Zero= Observed for the Span= Observed for the Zero= ration Check 21 (ppm CENTRATIONS CHECKS	I Gas Conc. X 100% = 100%- = 9977 113540 3648 11694 3648 11694 3678 Cal Gas Reading:	1.3 % <u>Trial 3:</u> Counters	500 x 100% Observed for the Span= Observed for the Zero=	115496 3619
Wind speed averages were observed to remain below the alternative requested 10 miles per hour and no instantaneous spec	an Sensitivity: al 1: Counters Counters Counters Monitoring Calibr Air Air Counters Monitoring Calibr Air Air Counters Monitoring Calibr Air Air Counters Monitoring Calibr Air Counters Monitoring Calibr	n= Average Difference/Ca s Observed for the Span= s Observed for the Zero= Observed for the Span= Observed for the Zero= ration Check 21 (ppm CENTRATIONS CHECKS	I Gas Conc. X 100% = 100%- = 9977 113540 3648 11694 3648 11694 3678 Cal Gas Reading:	1.3 % Trial 3: Counters	500 x 100% Observed for the Span= Observed for the Zero= m ading: $202 p$	<u>IIS 4 96</u> <u>З619</u>
	an Sensitivity: alibration Precision al 1: Counters Counters Counters Monitoring Calibr Air ling: CONC Air Counters Monitoring Calibr Air Counters Monitoring Calibr Air Monitoring Calibr Air Monitoring Calibr Monitoring Calibr Monitoring Calibr Monitoring Calibr Monitoring Calibr Monitoring Calibr	n= Average Difference/Ca s Observed for the Span= s Observed for the Zero= Observed for the Span= Observed for the Zero= ration Check DU ppm ENTRATIONS CHECKS ription:	I Gas Conc. X 100% = 100%- = 99,7 113540 3648 11694 3648 11694 3678 Cal Gas Reading: 110rc 0711. 349	<u>γ</u> T <u>rial 3:</u> Counters Counters Pp Rea Rea	500 x 100% Observed for the Span= CObserved for the Zero= ading: $2.7 p$ ading: $3.2 p$	<u>IIS496</u> <u>З619</u> рт

RELEASERS - STREET BERGESTERSELES.

Date::::::::::::::::::::::::::::::::::::	2020 metric essure: 24.87 "Hg r and the calibration gas. Record the rec fon gas as a percentage. The calibration ias Concentration: 500ppm Gas Reading Response Time (se Gas Reading Response Time (se	ndings
Inspector(s): A Fredo Gramo Instrument: TV WEATHER OBSERVATIONS Wind Speed:MPH Direction:Ban AirYF General Weather Temperature:YF Conditions: Sonry CALIBRATION INFORMATION Pre-monitoring Calibration Precision Check Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero a and calculate the average algebraic difference between the instrument reading and the calibrat arecision must be less than or equal to 10% of the calibration gas value. Instrument Serial Number:	2020 metric essure: 24.87 "Hg r and the calibration gas. Record the rec ion gas as a percentage. The calibration ias Concentration: 500ppm Gas Reading Response Time (se difference is greater than 10 100%	ndings
WEATHER OBSERVATIONS Wind Speed:	metric essure: 24.87 "Hg ir and the calibration gas. Record the rec ion gas as a percentage. The calibration ias Concentration: 500ppm Gas Reading Response Time (se	odings
Wind Speed:	r and the calibration gas. Record the rec for gas as a percentage. The calibration fas Concentration: 500ppm Gas Reading Response Time (se Gas Reading Response Time (se Gas Reading Response Time (se	conds)
Wind Speed:	r and the calibration gas. Record the rec fon gas as a percentage. The calibration ias Concentration: 500ppm Gas Reading Response Time (se	conds)
Air <u>59</u> Temperature: <u> </u> *F CALIBRATION INFORMATION Pre-monitoring Calibration Precision Check Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero a and calculate the average algebraic difference between the instrument reading and the calibrate recision must be less than or equal to 10% of the calibration gas value. Instrument Serial Number: <u> 2006</u>	r and the calibration gas. Record the rec fon gas as a percentage. The calibration ias Concentration: 500ppm Gas Reading Response Time (se	conds)
Temperature:	r and the calibration gas. Record the rec fon gas as a percentage. The calibration fas Concentration: 500ppm Gas Reading Response Time (se Gas Reading Gas Reading	conds
CALIBRATION INFORMATION Pre-monitoring Calibration Precision Check Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero a and calculate the average algebraic difference between the instrument reading and the calibrative realision must be less than or equal to 10% of the calibration gas value. Instrument Serial Number: Image Cal Gas Reading Cal Gas ConcCa 1 Image Cal Gas Reading Cal Gas ConcCa 2 Image Society 3 Image Society Average Difference: Image Society 1 Image Society 2 Image Society 3 Image Society Average Difference: Image Society Ibration Precision= Average Difference/Cal Gas Conc. X 100% Image Society 1 Image Society Image Society 2 Image Society Image Society 3 Image Society Image Society 1 Image Society Image Society 1	r and the calibration gas. Record the rec fon gas as a percentage. The calibration ias Concentration: 500ppm Gas Reading Response Time (se Gas Reading Gas Reading	conds
Pre-monitoring Calibration Precision Check Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero a and calculate the average algebraic difference between the instrument reading and the calibrate and calculate the average algebraic difference between the instrument reading and the calibrate and calculate the average algebraic difference between the instrument reading and the calibrate and calculate the average algebraic difference between the instrument reading and the calibrate and calculate the average algebraic difference between the instrument reading and the calibrate anstrument Serial Number: Cal Cal Gas Reading Cal Gas Reading Cal Gas ConcCa Cal Cal Gas ConcCal Gas Conc. X 100% Cal Cal Cal Cal Cal Gas Conc. X 100% Cal Cal Cal Cal Cal Gas Conc. X 100% Cal	r and the calibration gas. Record the rec fon gas as a percentage. The calibration ias Concentration: 500ppm Gas Reading Response Time (se Gas Reading Gas Reading Gas Reading Gas Reading Gas Concentration 10 Gas Reading Gas Reading Gas Concentration 10	conds
Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero a and calculate the average algebraic difference between the instrument reading and the calibration recision must be less than or equal to 10% of the calibration gas value. Instrument Serial Number: Cal Gas Reading [Cal Gas ConcCa 1 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	r and the calibration gas. Record the rec ion gas as a percentage. The calibration ias Concentration: 500ppm Gas Reading Response Time (se Gas Reading Gas Gas Response Time (se Gas Reading Gas	conds
In a calculate the average algebraic alignmence between the instrument reading and the calibration are equal to 10% of the calibration gas value. Instrument Serial Number: Cal Cal Gas Reading Cal Gas Reading Cal Gas Reading Cal Gas ConcCa Cal Cal Gas Reading Cal Gas Reading Cal Gas ConcCa Cal Cal Gas ConcCa Cal Cal Gas Reading Cal Gas Reading Cal Gas Reading Cal Gas ConcCa Cal Cal Gas Reading Cal Gas Reading Cal Gas Reading Cal Gas Reading Cal Gas ConcCa Cal Cal Gas Reading Cal Gas Reading Cal Gas Reading Cal Gas ConcCa Cal Cal Gas Reading Cal Gas Reading Cal Gas Reading Cal Gas ConcCa Cal Cal Gas Reading Cal Gas Reading Cal Gas ConcCa Cal Cal Gas Reading Cal Gas Reading Cal Gas ConcCa Cal Cal Gas ConcCa Cal Cal Gas Reading Cal Gas Reading Cal Gas ConcCa Cal Cal Gas ConcCal Gas ConcCal Gas ConcCa Cal Cal Gas ConcCal Gas ConcCal Gas ConcCa Cal Cal Cal Gas Cal Cal Gas ConcCal Gas ConcCal Gas ConcCa Cal Cal Gas ConcCal Gas ConcCa Cal Cal Gas ConcCal Gas ConcCal Gas ConcCal Gas Cal Cal Cal	on gas as a percentage. The calibration ias Concentration: 500ppm Gas Reading Response Time (se	conds;
nstrument Serial Number: Trial Zero Air Reading Cal Gas Reading Cal Gas ConcCa 1 Cal Gas ConcCa 2 Soz Cal Gas ConcCa 3 Concerner Cal Gas Conc. X 100% = 100%- (///S00 x 997.8 % n Sensitivity: <u>Il 1:</u> Counts Observed for the Span= <u>149826</u> Counts Observed for the Span= <u>149826</u> Counts Observed for the Span= <u>149826</u> Counts Observed for the Span= <u>149826</u> Counters Observed for the Span= <u>150 z \$ 2</u>	Gas Reading Response Time (se	conds
ial Zero Air Reading Cal Gas Reading ICal Gas ConcCa 1 0 1999 1 2 3 507 2 3 600 600 600 Average Difference: "Perform recalibration if average ibration Precision= Average Difference/Cal Gas Conc. X 100% = 100%- 1 /500 x SP7.8 % 149821 Counts Observed for the Span= 149821 600 z \$ 2. Counters Observed for the Zero= 600 z \$ 2. 600 z \$ 2. Counters Observed for the Span= 600 z \$ 2.	Gas Reading Response Time (se	conds
1 Cal Gas Reading Cal Gas ConcCa 1 1 1 1 2 1 1 1 3 1 1 1 Average Difference: Perform recalibration if average libration Precision= Average Difference/Cal Gas Conc. X 100% = 100%- /500 x 97.8 %	difference is greater than 10	
$\frac{2}{3}$ Average Difference: $\frac{5}{3}$ Average Difference: $\frac{5}{3}$ $\frac{100\%}{1}$ $\frac{100\%}{1}$ $\frac{100\%}{1}$ Average Difference/Cal Gas Conc. X 100% $\frac{100\%}{1}$ $\frac{100\%}{1}$ $\frac{100\%}{1}$ $\frac{100\%}{1}$ $\frac{100\%}{1}$ $\frac{100\%}{1}$ $\frac{112}{12}$ Counts Observed for the Span= $\frac{149821}{56}$ Counters Observed for the Zero= $\frac{5456}{50252}$ Counters Observed for the Span= $\frac{150252}{50252}$	difference is greater than 10	
Average Difference: Perform recalibration if average libration Precision= Average Difference/Cal Gas Conc. X 100% = 100%/500 x = 99.8 % In Sensitivity: In Sensitivity: Counts Observed for the Span=Y9824 Counters Observed for the Zero= 54/56 Counters Observed for the Zero= 54/56 Counters Observed for the Span=S0 z \$ Z .	difference is greater than 10	
Average Difference: Perform recalibration if average libration Precision= Average Difference/Cal Gas Conc. X 100% = 100% - (/500 x -97.8 % n Sensitivity: <u>11:</u> Counts Observed for the Span= <u>149827</u> Counters Observed for the Zero= <u>5456</u> Counters Observed for the Zero= <u>5456</u> Counters Observed for the Span= <u>150 z \$ 2</u> .	difference is greater than 10	
In Sensitivity: Il 1: Counts Observed for the Span= 149827 Counters Observed for the Zero=5456 Counters Observed for the Span= 150 z \$ 2.		
Counts Observed for the Span= 149827 Counters Observed for the Zero= 5456 Counters Observed for the Zero= 5456 Counters Observed for the Span= 150 z \$ Z		
Counters Observed for the Zero= 5456 Counters Observed for the Zero= 5456 Counters Observed for the Span= 450 z \$ Z	156120	
Counters Observed for the Zero= 2926 Counters Observed for the Span= 150 2 \$ 2		
Counts Observed for the Snan= $50 \ z > \zeta$	rved for the Zero= 3937	
Counters Observed for the Zero=		
Monitoring Calibration Check		
Air Cal Gas		
ling: ppm Reading: ppm		
KGROUND CONCENTRATIONS CHECKS		
nd Location Description: Keading: Reading:	2.7_ppm	
wind Location Description: Gr 5/19 Reading:	20	
Wind speed averages were observed to remain below the alternative requested 10 exceeded 20 miles per hour. No rainfall had occurred within the previous 24 hour	Jic ppm	

SEE BUSINESSING - STATISTICE ENVISIONED DE STATISTICE - FARMEN

		SURFACE EMISS	IONS MONITORIN	G	
	C	CALIBRATION AN	ID PERTINENT DAT	ГA	
Date:	1-26-2	4	Site Name:	they	
Inspector(s)	Don Gik	sen	Instrument:	2020	
WEATHER OB	SERVATIONS			33	
Wind Speec	мрн	Wind Direction:	Baror Pres	netric ssure: <u>29</u>	"Нд
Ai Temperature	55 *F	General Weathe Conditions	sunny		
CALIBRATION	INFORMATION				
Pre-monitoring	Calibration Precision Check				
Procedure: Caliz and calculate th precision must b Instrument Seria	prate the instrument. Make of e average algebraic differen e less than or equal to 10% of low	a total of three measuremen ce between the instrument i of the calibration gas value.	nts by alternating zero air reading and the calibratio Cal Ga	and the calibration on gas as a percent as Concentration	n gas. Record the readings age. The calibration 500ppm
Trial	Zero Air Reading	Cal Gas Reading	Cal Gas ConcCal	Gas Reading	Response Time (seconds)
1	-0.1	50			8
3	~013	501	9		6
Calibration Precis	ion= Average Difference/Cal	Gas Conc. X 100%	/500 × 10	00%	
		= 79,8	%		
<mark>Span Sensitivity:</mark> <u>Trial 1:</u> Cou	nts Observed for the Span=	147838	Trial 3: Counts Observ	ved for the Span=	148243
Count	ers Observed for the Zero=	47.85	Counters Observ	ved for the Zero=	47.54
<u>Trial 2:</u> Cour	nts Observed for the Span=	14-8212			1001
Count	ers Observed for the Zero=	4252			
Post Monitoring Ca	libration Check				
Zero Air Reading:		Cal Gas Reading:	mqq 502		
BACKGROUND CO	NCENTRATIONS CHECKS	\bigcirc			
Upwind Location De	scription:	Florz	Reading:	2.7	m
Downwind Location	Description –	4549	Reading	3.C p	mc
Notes: Win exc me	nd speed averages were obs eeded 20 miles per hour. A teorological conditions wer	served to remain below the Io rainfall had occurred with e within the requested alter	alternative requested 10 nin the previous 24 hours matives of the LMR requir	miles per hour and of the monitoring rements on the abo	l no instantaneous speeds event. Therefore, site ove mentioned date.

		SURFACE EMIS	SIONS MONIT	DRING	
Date	10-02-24		Site Name:	Nausbul	
	Ennerta Ro		lastrumont:	TVA 2020	
inspector(s)	Commander 1 a		instrument.	1 VA 2020	
WEATHER OB	SERVATIONS				
Wind Speed	I: <u>2</u> MPH	Wind Direction: ()),()		Barometric Pressure 29.80	"Hg
Ai	(1	General Weath	ier (
Temperature		Condition	15:		
CALIBRATION	INFORMATION	30			
Pre-monitoring	Calibration Precision Check				
and calculate th precision must b nstrument Seria	e average algebraic differen e less than or equal to 10% c i Number <u>542</u>	ce between the instrumen of the calibration gas value	t reading and the cal	ibration gas as a percenta Cal Gas Concentration:	ge. The calibration 500ppm
Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Con	cCal Gas Reading	Response Time (seconds
2	-01	503		3	6
3	-0-1	501		1	9
anoration Precis	IOU= AAGLAGE OUGLEUCE/CA	= 100% = 99,6	/5)%	00 x 100%	
an Sensitivity:					
i <u>al 1:</u> Cou	nts Observed for the Span=	144320	<u>Trial 3:</u> Counts	Observed for the Span= 1	42753
Count	ers Observed for the Zero=	2712	Counters	Observed for the Zero=	2972
al 2: Cour	nts Observed for the Span=	139754			
Count	ers Observed for the Zero=	3433			
t Monitoring Ca	libration Check				я
o Air ding:	1.2ppm	Cal Gas Reading	UQ pp	n s	
KGROUND CO	INCENTRATIONS CHECKS				
vind Location De	escription:	flare	Rea	iding: <u>2.4</u> pp	m
				1 7	
nwind Location	Description -	grid	Rea	iding: <u>()</u> pp	m

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3.00

		SURFACE EMISSI	idias iaidiai 10 pertiner	NT DATA	
Date	10-03-24		Site Name:	Newby	
Inspector(s):	R.yepez		Instrument:	TVA 2020	
WEATHER OF	SERVATIONS				
Wind Speed	d: Z мрн	Wind Direction:		Barometric Pressure: 29.80	'Hg
Ai Temperature	ir 67 *F	General Weathe Conditions	SUNNY		
	INFORMATION			_	
Pre-monitoring	Calibration Precision Check				
rocedure Calib nd calculate th recision must b istrument Seria	orate the instrument. Make a ne average algebraic differenc ne less than or equal to 10% o al Number.	total of three measuremen e between the instrument f the calibration gas value.	nts by alternating reading and the c	g zero air and the calibratic calibration gas as a percen Cal Gas Concentration	n gas Record the readin tage. The calibration 500.pp m
ial	Zero Air Reading	Cal Gas Reading	Cal Gas C	onc -Cal Gas Reading	Response Time (secon
1	-0-1	506		0	9
2	-0.1	498		2	8
	-0.1		1		0
libration Precis	ion= Average Difference/Cal	Gas Conc. X 100%	*Perform recalibration	3 if average difference is greater than	10
libration Precis	ion= Average Difference/Cal	Gas Conc. X 100% = 100%- = 999.8	Perform recalibration	5 if average difference is greater than /500 x 100%	10
libration Precis	ion= Average Difference/Cal	Gas Conc. X 100% = 100%- = 99.8	Perform recalibration	5 if average difference is greater than /500 x 100%	
libration Precis n Sensitivity: <u>al 1:</u> Cou	ion= Average Difference/Cal	Gas Conc. X 100% = 100%- = 99.8 139809	Perform recalibration	5 if average difference is greater than /500 x 100% ts Observed for the Span=	138792
libration Precis n Sensitivity: 11: Cou Count	ion= Average Difference/Cal nts Observed for the Span= ters Observed for the Zero=	Gas Conc. X 100% = 100%- = 99.8 139809 34 21	Perform recalibration % <u>Trial 3:</u> Counte	if average difference is greater than /500 x 100% ts Observed for the Span= rs Observed for the Zero=	138792 3341
libration Precis n Sensitivity: al 1: Cou Count 12: Cou	ion= Average Difference/Cal ints Observed for the Span= ters Observed for the Zero= nts Observed for the Span=	Gas Conc. X 100% = 100%- = 99.8 139809 34277	Perform recalibration	5 if average difference is greater than /500 x 100% ts Observed for the Span= rs Observed for the Zero=	138792 3341
libration Precis n Sensitivity: <u>al 1:</u> Cou <u>Count</u> Cou Count	ion= Average Difference/Cal ints Observed for the Span= ters Observed for the Zero= nts Observed for the Span= ers Observed for the Zero=	Gas Conc X 100% = 100%- = 99.8 139809 34277 34277 3419	Perform recalibration % <u>Trial 3:</u> Counte	5 if average difference is greater than /500 x 100% ts Observed for the Span= rs Observed for the Zero=	1387972 3341
libration Precis	ion= Average Difference/Cal ints Observed for the Span= ters Observed for the Zero= nts Observed for the Span= ers Observed for the Zero= alibration Check	Gas Conc X 100% = 100%- = 99.8 139809 34 21 34277 3419	Perform recalibration % <u>Trial 3:</u> Counte	if average difference is greater than /500 x 100% ts Observed for the Span= rs Observed for the Zero=	138792 3341
libration Precis n Sensitivity: <u>I 1:</u> Cou <u>Count</u> Monitoring Ca Air ling:	ion= Average Difference/Cal Ints Observed for the Span= ters Observed for the Zero= Ints Observed for the Span= ers Observed for the Zero= alibration Check	Gas Conc. X 100% = 100%- = 99.8 139809 34277 34277 3419 Cal Gas Reading:	Perform recalibration % Trial 3: Counte Counte	if average difference is greater than /500 x 100% ts Observed for the Span= rs Observed for the Zero=	138792 3341
libration Precis	ion= Average Difference/Cal ints Observed for the Span= ters Observed for the Zero= ints Observed for the Zero= alibration Check <u>I.3</u> ppm DNCENTRATIONS CHECKS	Gas Conc. X 100% = 100%- = 99.8 139809 34277 34277 3419 Cal Gas Reading:	Perform recalibration % Trial 3: Counte Counte	if average difference is greater than /500 x 100% ts Observed for the Span= rs Observed for the Zero=	1387972 3341
libration Precis	ion= Average Difference/Cal ints Observed for the Span= ters Observed for the Zero= its Observed for the Zero= alibration Check <u>1.3</u> ppm DNCENTRATIONS CHECKS escription:	Gas Conc. X 100% = 100%- = 99.8 139809 3421 34277 3419 Cal Gas Reading: -	Perform recalibration % Trial 3: Counte Counte	if average difference is greater than /500 x 100% ts Observed for the Span= rs Observed for the Zero= ppm eading: <u>2. 4</u>	138797 3341 3341
libration Precis In Sensitivity: Ill: Cou Count Il: Cou Count Monitoring Ca Air ling: CGROUND CC Ind Location De Iwind Location	ion= Average Difference/Cal of ints Observed for the Span= ters Observed for the Zero= ints Observed for the Span= ers Observed for the Zero= alibration Check <u>1.3</u> ppm DICENTRATIONS CHECKS escription:	Gas Conc. X 100% = 100%- = 99.8 139809 3421 34277 3419 Cal Gas Reading: flwe grid	*Perform recalibration % Trial 3: Counte Counte R R R	if average difference is greater than /500 x 100% ts Observed for the Span= rs Observed for the Zero= ppm eading: 2.4 to 3	1387972 3341 29m

		CALIBRATION AN	D PERTINEN	IT DATA	
Date:	10-03-24		Site Name:	Newby	
Inspector(s)	Andrew S		Instrument:	TVA 2020	
WEATHER OF	BSERVATIONS				
Wind Speed	d:мрн	Wind Direction:	-	Barometric Pressure: 29.8	O "Hg
A Temperature	ir =: 67 *F	General Weather Conditions	Sunny		
CALIBRATION	INFORMATION				
Pre-monitoring	Calibration Precision Check				
Procedure Cali and calculate th precision must b nstrument Seria	brate the instrument. Make of the average algebraic difference be less than or equal to 10% of al Number.	n total of three measuremen ce between the instrument r f the calibration gas value.	ts by alternating reading and the o	zero air and the calibratic calibration gas as a percen Cal Gas Concentration;	n gas. Record the reading tage. The calibration 500ppm
rial	Zero Air Reading	Cal Gas Reading	Cal Gas C	oncCal Gas Reading	Response Time (second
1	- 6.1	498		2	7
2	0	501		0	0
		= 100%-	1	/500 x 100%	
		= 99.8	%	υ	
an Sensitivity:			Friel 3.		
ar I: Cou	unts Observed for the Span=	135034	Coun	ts Observed for the Span=	134985
Coun	ters Observed for the Zero=	2615	Counte	rs Observed for the Zero=	25 36
al 2: Cou	ints Observed for the Span=	133216			
Count	ters Observed for the Zero=	2452			
t Monitoring C	alibration Check				
o Air ding	2.0 ppm	Cal Gas Reading:	502	ppm	
KGROUND CO	ONCENTRATIONS CHECKS				
vind Location D	escription:	flare	R	eading: 2.4	ppm
nwind Location	n Description	grid	R	eading: <u>4-3</u>	ppm
es: W	ind speed averages were ob: ceeded 20 miles per hour. N eteorological conditions wer	served to remain below the lo rainfall had occurred with e within the requested alter	alternative requ nin the previous matives of the LM	ested 10 miles per hour ar 24 hours of the monitorin VIR requirements on the al	nd no instantaneous speed g event. Therefore, site bove mentioned date

	SURFACE EMISSIONS MONITORING					
5		volutau	CALIBRATION AN	AD PERTINEN	AL BCI	я
\frown	Date	A STALF		Site Name	Newy	
)	Inspector(s):	AJUNE		Instrument	TVA 2020	
	WEATHER OF	BSERVATIONS				
	Wind Speed	d: 6 мрн	Direction: 5		Pressure: 30.07	"Hg
	А	ir 🕤 📼	General Weathe	er MEDA		
	Temperature	e:*F	Condition:	S: UEAK		
	CALIBRATION	INFORMATION				
	Pre-monitoring	Calibration Precision Check	ς.			
	Procedure Calin and calculate th	brate the instrument. Makine average algebraic differe	e a total of three measureme ence between the instrument	nts by alternating reading and the c	zero air and the calibration g alibration gas as a percentag	gas Record the readings ge The calibration
	precision must l	be less than or equal to 10%	6 of the calibration gas value.			
	Instrument Seria	al Number: 54			Cal Gas Concentration	500ppm
	Trial 1	Zero Air Reading	Cal Gas Reading	Cal Gas Co	oncCal Gas Reading	Response Time (seconds)
	2	-0.1	500		Ö	5
			Average Difference:	Г	7	
\cap			Average officience.	*Perform recalibration	if average difference is greater than 10	
\cup	Calibration Precis	sion= Average Difference/C	al Gas Conc. X 100%			
			= 100%-	•6	/500 × 100%	
			99.88	%		
	Span Sensitivity:					
	<u>Trial 1:</u> Cou	unts Observed for the Span	= 127842	<u>Trial 3:</u> Count	s Observed for the Span=	25962
	Coun	ters Observed for the Zero	3605	Counte	rs Observed for the Zero=	3583
	Trial 2:		12/3/11	counte		
	COU	ints Observed for the spans	2004			
ŀ	Count	ters Observed for the Zero-	02-14			
P	ost Monitoring C	alibration Check				
Z	ero Air eading: 🚬	0.5 ppm	Cal Gas Reading:	496	pm	
8	ACKGROUND CO	ONCENTRATIONS CHECK	S			
U	pwind Location D	escription	FLARE	R	eading 6.8 pp	m
	ownwind Location	n Description.	ENTRANCE	R	eading. 1.9 pp	n
N	otes: W ex ma	ind speed averages were c ceeded 20 miles per hour, eteorological conditions w	bserved to remain below the No rainfall had occurred with ere within the requested alte	e alternative requi thin the previous a ernatives of the LN	ested 10 miles per hour and 24 hours of the monitoring e 4R requirements on the abov	no instantaneous speeds vent. Therefore, site ve mentioned date.

SER BARRES - STANDARD - STAND

		SURFACE EMISS	IONS MONIT	ORING	
	inter low	CATIONA I COI O MIC		1/SWB1	
Date	10/11/24		Site Name	Newy	
Inspector(s)	E-PAZ		Instrument	TVA 2020	
WEATHER OB	SERVATIONS				
Wind Speed	6 мрн	Wind Direction:	_	Barometric Pressure	02 _{"Hg}
Air Temperature:	52 1	General Weathe Conditions	CLEAR	-	
CALIBRATION	NFORMATION				
Pre-monitoring (Calibration Precision Check				
and calculate the precision must be Instrument Serial	e average algebraic difference e less than or equal to 10% o Number	e between the instrument f the calibration gos value.	reading and the c	alibration gas as a percen Cal Gas Concentration	tage The calibration
Trial	Zero Air Reading	Cal Gas Reading	Cal Gas Co	onc -Cal Gas Reading	Response Time (seconds)
1	-0.1	503		<u> </u>	T.
2	-D.I	500		0	2
		= 100%-	1.5	/500 x 100%	
		= 19. 74	%		
pan Sensitivity:			Trial 3;		
Cour	nts Observed for the Span=	144322	Count	s Observed for the Span=	143233
Count	ers Observed for the Zero=	3300	Counter	rs Observed for the Zero=	
rial 2: Cour	its Observed for the Span=	142784			
Counte	ers Observed for the Zero=	3361			
ost Monitoring Ca	libration Check				
ero Air eading:	1.0 ppm	Cal Gas Reading:	509 p	pm	
CKGROUND CO	NCENTRATIONS CHECKS				
wind Location De	scription:	FLARE	R	eading: 6.8	ppm
wnwind Location	Description: 🗧	ENTRANCE	R	eading	ppm
tes: Wir exc me	nd speed averages were obs eeded 20 miles per hour. N teorological conditions were	erved to remain below the o rainfall had occurred wit e within the requested alte	e alternative reque thin the previous 2 ernatives of the LM	ested 10 miles per hour an 24 hours of the monitorin AR requirements on the ai	nd no instantaneous speeds g event: Therefore, site bove 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

October 3, 2024



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

October 11, 2024 12AM 3AM 6AM 9AM 12PM 3PM 6PM 9PM 12AM 75 70 65 60 55 50 45 Temperature (°F) Dew Point (°) 6 5 4 3 2 1 0 Wind Gust (mph) Wind Speed (mph) 360° 270° W 180° s 90° Е 0° Ν Wind Direction 1 0.8 0.6 0.4 0.2 0 Precip. Accum. Total (in) Precip. Rate (in)

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

SCS FIELD SERVICES

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

Encl.

Sean Bass

Sean T. Bass Senior Project Manager SCS Field Services

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



	6	7	8	G	10	11
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1R	– SEE NOTE 1					
10						
- MAV	V-16 CS74					
	EW-63 EW-60 So MW-1	7 ⊕ GP-2R				
EW-733	16 EW-59					
-100	20 EW-57		_			
210	EW-466	MW-19				
* EW-66						
, 	EW-714		0	li .		
	€ 32 628	33/20 @				
	36 555	EW-218 37		0		
	EW-217	42	GP-3R 20	-MANIEOLD-14		
	45	EW-691 46	47 MW-22 50	10	1	
	120 130 (D) FW-10151	- 106 EW-747	zo <u>CS6</u> MW-23	20 30 2FW4705	186	
FW-	627 LEW-5		33	60 FW-24		
	140 59	** EW-232	@ EW-501 61	70 - 70	gp-4R	
	160 69	70	110 71		MV-25(C) + + MANIFOL	R-15
	180 80	EW-499 81	82 EW-E	100 83	110 MW-26	
	¹⁹⁰ 89 (F	900 · · · · · · ·	91	110 92 EW-25		0
TO OT	EW-725	ew-769 101	110 102	103 EW-753	- 8-93 MW-27	
35	EW-510 EW-688			112 @ EW		30 40
735 V-40R	EW-6/6	8 EW-476	7.9	12		
		EW-752	EW-155		EW-735	<u>125</u>
(4A >	▲ 31FW-741	132 3EW	₃₁ 133	134	135	₩-35 ₩-35
586 J	8 8 0 0 € 7 7 8 0 0 0 € 7 7 8 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	₩-742 * 142	EW-703 143 - 46		EW-19 145 EW-483	146 2 3 9 6 6 6 6 6
	W-646 EW-61 52 C	153	80 154 EW-701	155 • EW-24	156	
· 🕑	EW-668 162	163	164	165 ⁴	166	167
EW-699	€ / € EW 573 •▲	174	175	17600	179 EW-704	
	500 EW-756 EW-6600					
EW-695		2 104 10°	CON		107 EW-	504 188
EW-655			195	196 LEW-16	19 <i>1</i>	<u></u>
DEW-7	³ gw-6 204 → →	205 CW3		207	208	209 MW-33
EW	760 EW-2313 A	₽° 214 • CW4	215	216	217 EW-252	218 MAN
63	E 222 EW-645	80 223 W-768	STA 734 6	225 EW	226 EW-2R	227
şÉW-762	EW-7/2 231	232 232	33 234	235	236	8 237
	W-644 EW-643	BC-17A	⊕0 GP-13	242	243	30,000
91	Eviv-042 - 8	MANIFOLD-2	ANIFOLD-1	VIL -4.7		
W-592	HC-227A Sta	MANIFOI D-3		240	243 EW-460	
-641	254 227 STATION 5		`	255	256 50	257
	ERS OF-14		6	258	259 ³⁰	MANIFOLD-
-MANI	FOLD-4			260	261	262
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Attachment 2

Surface Pathway



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



LMR Surface Emissions Monitoring First and Second 10-Day Pathways Newby Island Landfill, Milpitas, California Attachment 3

Instantaneous and Component Emissions Monitoring Results



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

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

Table 1. LMR Instantaneous Surface and Component Emissions Monitoring Results

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

Table 1. LMR Instantaneous Surface and Component Emissions Monitoring Results

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

Table 1. LMR Instantaneous Surface and Component Emissions Monitoring Results

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

Table 1. LMR Instantaneous Surface and Component Emissions Monitoring Results

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

Table 1. LMR Instantaneous Surface and Component Emissions Monitoring Results

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

 Table 1. LMR Instantaneous Surface and Component Emissions Monitoring Results

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

Table 1. LMR Instantaneous Surface and Component Emissions Monitoring Results

Newby Island Sanitary Landfill, Milpitas, California

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

200-499 ppmv

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

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



Point Name	Record Date	FID Concentration	Comments
NUL_018	1/20/2025	(ppm)	Second 10 Day Pechack
NIL-010	12/26/2023	20.20	
NIL-019	12/20/2024	39.39	
NIL-019	12/27/2024	30.08	First 10-Day Recheck
NIL-019	1/17/2025	39.27	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
NII-026	1/17/2025	45,79	Second 10-Day Recheck
	12/17/2020	22.40	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



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
NUL 051	, , , , ,		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
NII -068	1/20/2025	37.10	Second 10-Day Recheck
	1,20,2023	57.15	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

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



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
NII -143			Expansion Due April 16, 2025
NII -144	12/18/2024	11 41	Activey Exempt Area
NIL -145	12/26/2024	3 32	
NIL-146	12/26/2024	3.32	
NII -147			Active/Exempt Area
NII -148			Active/Exempt Area
NII -149			Active/Exempt Area
NII -150			Active/Exempt Area
NII -151			Active/Exempt Area
NII -152			Active/Exempt Area
NII -153			Active/Exempt Area
NIL-154			Active/Exempt Area
NII -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



Point Name	Record Date	FID Concentration	Comments
NII -162		(ppm)	Active/Exempt Area
NIL-162			Active/Exempt Area
NIL-165			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
NII -191			Active/Exempt Area
NII -192			Active/Exempt Area
NII -193			Active/Exempt Area
NII -194			Active/Exempt Area
NIL 194			Active/Exempt Area
NIL-195	12/18/2024	10.17	Active/Exempt Area
NIL-190	12/18/2024	7.08	
NIL-197	12/10/2024	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



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

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

January 28, 2025 12AM 3AM 6AM 9AM 12PM 3PM 6PM 9PM 12AM 60 50 40 30 Dew Point (°) Temperature (°F) 8 6 4 2 0 Wind Speed (mph) Wind Gust (mph) 360° Ν 270° w 180° S 90° 0° Wind Direction 1 0.8 0.6 0.4 0.2 0 Precip. Accum. Total (in) Precip. Rate (in)

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

<u>Subject:</u> 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

<u>Sampling Location</u>: 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.

<u>Sampling Personnel:</u> 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.

<u>**Test Program:**</u> 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 (CO₂) and oxygen (O₂) 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 (NO₂) concentrations are determined by passing the sample through a catalyst which reduces the NO₂ to NO. The total oxides of nitrogen concentration (NO₂ + 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.

<u>QA/QC</u> 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 preevacuated 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.

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	СО	Gas Filter Correlation/IR	
TECO Model 55C	THC/CH ₄ /VOC	Flame Ionization (FID)	

Instrumentation: The following continuous emissions analyzers were used:



<u>**Test Results:**</u> 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% O2 as CH4	<3.0	30	In Compliance
NMOC Destruction Efficiency, %	>98.38	or >98%	In Compliance
CH4 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	In Compliance	
NMOC Destruction Efficiency, %	>98.85	or >98%	In Compliance	
CH4 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.
<u>Stack Diagram</u>
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.

<u>Comments</u>: 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

2 au

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 ₂ S), ppmv (ASTM D5504)	394	453	432	426	
Inlet TRS, ppmv as H ₂ S (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 ₂ O), % 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):	52.0	50.7	51.0	50.5	
NOv popud	14.4	15.0	15.3	14.0	
NOx, ppmvd (a) 15% O ₂	14.4	11.1	11.1	14.9	12
NO- 14 /hz	1.52	1.55	1 51	1.52	12
NOx, Ib/hr	1.52	1.55	1.51	1.55	
NOx, ID/day	36.5	37.1	36.3	36.6	0.05
NOx, lb/MMBtu	0.0429	0.0435	0.0433	0.0432	0.05
CO Emissions:		aa 7	25.4	21.2	
CO, ppmvd	24.1	23.5	25.4	24.3	04
CO, ppillvd @ 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 (<i>a</i>) 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 pomyd (EP.4 Mathed 25C)	914	1.059	958	977	
Inlet NMOC lb/br	272	3.14	2.91	2.80	
NMOC Destruction Efficiency 0/	2.72 >08 540/	5.14 S08 740/	>07 010/	>08 200/	>000/
Inter CH appred (45TMD 1045)	/20.3470	/ 20./47/0	480.000	/ 20.30%	~9870
Indet CIT ₄ , ppmvd (ASIM D-1945)	489,000	495,000	489,000	490,000	
CH Destruction Efficience 0/	1,45/	1,402	1,433	1,451	>000/
L1. THE TOC	~yy.y/%	~yy.y/%	~yy.y/%	~yy.y/%	~>>>%
Inlet THC (TOC), ppmvd	469,914	494,059	409,958	491,310	
Inlet THC (TOC), lb/hr	1,460	1,405	1,430	1,454	> 0.007
THU (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 CH₄ (MW = 16)

 $\mathrm{THC}=\mathrm{total}$ hydrocarbons, reported as $\mathrm{CH}_4~(\mathrm{MW}=16)$

 $\rm NMOC$ = non-methane organic compounds, reported as $\rm CH_4~(MW$ = 16)

CALCULATIONS,

15% O_2 Correction = ppm \cdot 5.9 / (20.9 - % \mathrm{O}_2)

3% O₂ Correction = ppm · 17.9 / (20.9 - %O₂)

 $lb/hr = ppm \cdot 8.223 \text{ E-}05 \cdot DSCFM \cdot MW \ / \ Tstd. \ ^R \\ lb/day = lb/hr \cdot 24$

 $^{-}$ lb/MMBtu = Fd · MW · ppm · 2.59E-9 · 20.9/(20.9 - %O₂)

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

SO₂, ppm (calculated) = inlet TRS, ppmv · fuel flow rate, DSCFM/exhaust flow rate, DSCFM

<value = 2% of analyzer range

TABLE #2AP42 2.4-1 - Landfill Gas Samples

Newby Island Landfill Flare (A-2)

			Results
Constituent	Method	Units	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	dad	<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 ₂ S), ppmv (ASTM D5504)	340	402	403	382	
Inlet TRS, ppmv as H ₂ S (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 (H2O), % volume (EPA Method 4)	10.63	9.90	9.59	10.04	
SO ₂ ppmy (calculated)	42.1	41.2	38.2	40.5	
NO _x Emissions (reported as NO ₂):	12.1	11.2	50.2	10.5	
NOx pomyd	3.8	3.5	37	3.7	
NOx ppmvd @ 15% O ₂	2.7	2.5	27	2.6	6
NOv lb/br	1.13	1.03	1 11	1.09	0
NOx lb/day	27.1	24.8	26.6	26.1	
NOx 1b/MMBtu	0.0107	0.0099	0.0106	0.0104	0.025
CO Emissions:	0.0107	0.0077	0.0100	0.0104	0.025
CO engrad	2.5	2.5	2.2	2 0	
CO, ppinva	2.3	3.5	2.3	2.0	24
$CO, ppinva (@ 1576 O_2)$	1.8	2.3	1.7	2.0	24
CO, ID/hr	0.46	0.65	0.42	0.51	
	0.0044	15.1	10.1	12.1	0.040
THC Emissions (reported as CH):	0.0044	0.0060	0.0040	0.0048	0.060
THE Emissions (reported as CH4):			-10.0	110.0	
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 <i>(EPA Method 25A)</i>	<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 (a) 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	
CH4 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,

 $\label{eq:product} \begin{array}{l} \mbox{ppmvd} = \mbox{parts per million concentration by volume expressed on a dry gas basis} \\ \mbox{lb/hr} = \mbox{pound per hour emission rate} \\ \mbox{Tstd.} = \mbox{standard temperature (°R = °F+460)} \\ \mbox{WW} = \mbox{nolecular weight} \\ \mbox{DSCFM} = \mbox{dry standard cubic feet per minute} \\ \mbox{DSCFM} = \mbox{dry standard cubic feet per minute} \\ \mbox{NO}_{X} = \mbox{oxides of nitrogen, reported as NO}_{2} (MW = 46) \\ \mbox{CO} = \mbox{carbon monoxide} (MW = 28) \\ \mbox{CH}_{4} = \mbox{methane} (MW = 16) \\ \mbox{TOC} = \mbox{THC} = \mbox{total organic compounds, reported as CH}_{4} \ (MW = 16) \end{array}$

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

NMOC = non-methane organic compounds, reported as CH4 (MW = 16)

CALCULATIONS,

$$\begin{split} & 15\% \ \bar{O}_2 \ \text{Correction} = ppm \cdot 5.9 \ / \ (20.9 - \%O_2) \\ & 3\% \ O_2 \ \text{Correction} = ppm \cdot 17.9 \ / \ (20.9 - \%O_2) \\ & 10/\text{tr} = ppm \cdot 8.223 \ E-05 \cdot \text{DSCFM} \cdot \text{MW} \ / \ \text{Tstd.}^{\circ}\text{R} \\ & 10/\text{day} = 1b/\text{hr} \cdot 24 \\ & 1b/\text{MMBtu} = Fd \cdot \text{MW} \cdot \text{ppm} \cdot 2.59E \cdot 9 \cdot 20.9 \ / \ (20.9 - \%O_2) \\ & \text{Destruction Efficiency} = (nlet, 1b/\text{hr} - outlet, 1b/\text{hr}) \ / \ inlet, 1b/\text{hr} \\ & \text{SO}_2, ppm \ (calculated) = inlet\ TRS, ppmv \cdot fuel\ flow\ rate, DSCFM \ (exhaust\ flow\ rate, DSCFM) \ (20.9 \ rate, DS$$

<value = 2% of analyzer range

TABLE #4AP42 2.4-1 - Landfill Gas Samples

Newby Island Landfill Flare (A-3)

			Results
Constituent	Method	Units	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	dad	<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	dad	<40.2
2-Propanol (Isopropyl Alcohol, IPA)	EPA TO-15	ppb	4,250
Acrylonitrile	EPA TO-15	dad	<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



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 follo	wing:			
A fire or increased well temperature.	\Box 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 CFI	R §63.1958(b).		
• If NO to <u>ALL</u> 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 \Box Vac				
the initial exceedance?				
• 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.				



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 \Box Vac. \Box N		
initial exceedance per implementation schedule?		
• If YES, send notification to state agency within 75 days of	initial exceeda	ance. 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.



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. \Box Yes \boxtimes No		
Use of a geomembrane or synthetic cover.		
A decommissioned well.	\Box Yes	🖾 No
• If YES to ANY of the above, exempt as per 40 CFR 62.16720	(a)(3)(iii)/ 40 CF	R §63.1958(b).
• If NO to <u>ALL</u> 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 \square No.		
the initial exceedance?		
• 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.		



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. \Box Yes \boxtimes N		⊠ No
Use of a geomembrane or synthetic cover.	\Box 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 CF	'R §63.1958(b).
• If NO to <u>ALL</u> 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	V Voc	
the initial exceedance?		
• 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 exc	eedance.	



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. \Box Yes \boxtimes N		
Use of a geomembrane or synthetic cover.		🖾 No
A decommissioned well.	🗆 Yes	🖾 No
• If YES to ANY of the above, exempt as per 40 CFR 62.16720	(a)(3)(iii)/ 40 CF	R §63.1958(b).
• If NO to <u>ALL</u> 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	Vac	
the initial exceedance?		
• 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.		



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. \Box Yes \boxtimes N		
Use of a geomembrane or synthetic cover.		🖾 No
A decommissioned well.	□ Yes	🖾 No
• If YES to ANY of the above, exempt as per 40 CFR 62.16720	(a)(3)(iii)/ 40 CFI	R §63.1958(b).
• If NO to <u>ALL</u> 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?		
• 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 exc	eedance.	



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

F	
Expected Start Date:	10/1/2024
Expected Completion Date:	10/31/2024
Provide a description of propo	sed 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.

nal Steps		
termine the required next steps.		
the remediation expected to take less than 120 days since	⊠ Voc	
tial exceedance per implementation schedule?		
If YES, send notification to state agency within 75 days of	initial exceeda	ince. Include
Root Cause Analysis, Corrective Action Analysis, and Imple next NSPS Report.	mentation Sch	edule in the
1	nal Steps termine the required next steps. the remediation expected to take <u>less than 120 days</u> since tial exceedance per implementation schedule? If YES, send notification to state agency within 75 days of Root Cause Analysis, Corrective Action Analysis, and Imple next NSPS Report.	nal Steps termine the required next steps. the remediation expected to take less than 120 days since tial exceedance per implementation schedule? If YES, send notification to state agency within 75 days of initial exceeda Root Cause Analysis, Corrective Action Analysis, and Implementation Sch 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

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)	\Box Yes	🖾 No	
for this well?			
• 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 \Box Vac. \Box Nac.			
since the initial exceedance?			
• 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

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

Fi	nal Steps		
De	etermine the required next steps.		
Is	the remediation expected to take less than 120 days since	Vec.	
th	e initial exceedance per the implementation schedule?		
•	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.		



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. \Box Yes \boxtimes No			
Use of a geomembrane or synthetic cover.		🖾 No	
A decommissioned well. \Box Yes \boxtimes 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 <u>ALL</u> 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 ar	ea.		
Determine the required next steps.			
Was the positive pressure remediated within 60 days since	V Voc		
the initial exceedance?			
• 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 exc	eedance.		



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.			
Use of a geomembrane or synthetic cover. \Box Yes \boxtimes No			
A decommissioned well.			
• 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 <u>ALL</u> 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	V Voc		
the initial exceedance?			
• 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.			



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.			
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 <u>ALL</u> 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	Voc		
the initial exceedance?			
• 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 ("H₂O). 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 <u>jfreedman@republicservices.com</u> or Sean Bass at (209)-345-2458 or by email at <u>SBass@scsengineers.com</u>.

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



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.	\Box Yes	🖾 No		
Use of a geomembrane or synthetic cover.	□ Yes	🖾 No		
A decommissioned well.	□ Yes	🖾 No		
• If YES to <u>ANY</u> of the above, exempt as per 40 CFR 62.16720(a)(3)(iii)/ 40 CFR §63.1958(b).				
• If NO to <u>ALL</u> 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		⊠ No		
the initial exceedance?				
• 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.				



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 re	quired next steps.		
Is the remediation	n expected to take less than 120 days since	🖂 Yes 🛛 No	
initial exceedanc	e per implementation schedule?		
• 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 Re	port.		
 If NO send 	Root Cause Analysis Corrective Action Ana	lysis and Imr	lementation

• 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 <u>ifreedman@republicservices.com</u> or Sean Bass at (209)-345-2458 or by email at <u>SBass@scsengineers.com</u>.

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



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. \Box Yes \boxtimes 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 CF	R §63.1958(b).	
• If NO to <u>ALL</u> 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		\square No	
the initial exceedance?	\Box res		
• 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.			



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 less than 120 days since	Voc	
initial exceedance per implementation schedule?		
• If YES, send notification to state agency within 75 days o	f initial exceeda	nce. Include
Root Cause Analysis, Corrective Action Analysis, and Impl	ementation Sch	edule in the
next NSPS Report.		
• If NO send Root Cause Analysis Corrective Action An	alysis and Imr	lementation

• 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 <u>jfreedman@republicservices.com</u> or Sean Bass at (209)-345-2458 or by email at <u>SBass@scsengineers.com</u>.

Sincerely,

red

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



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. \Box Yes \boxtimes 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 CFI	R§63.1958(b).	
• If NO to <u>ALL</u> 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?			
• 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.			



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 re	quired next steps.		
Is the remediation	n expected to take <i>less than 120 days</i> since	Voc	
initial exceedanc	e per implementation schedule?	\square res	
• If YES, send	notification to state agency within 75 days of	initial exceeda	ince. Include
Root Cause A	nalysis, Corrective Action Analysis, and Imple	mentation Sch	edule in the
next NSPS Re	port.		
 If NO send 	Root Cause Analysis Corrective Action Ana	lysis and Imr	lementation

• 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 ("H₂O). 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 <u>ifreedman@republicservices.com</u> or Sean Bass at (209)-345-2458 or by email at <u>SBass@scsengineers.com</u>.

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



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. \Box Yes \boxtimes 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 CF	R §63.1958(b).	
• If NO to <u>ALL</u> 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		\square No	
the initial exceedance?	\Box res		
• 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.			



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
Duranida a daganintian af muana	

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	Voc	
initial exceedance per implementation schedule?		
• If YES, send notification to state agency within 75 days o	f initial exceeda	nce. Include
Root Cause Analysis, Corrective Action Analysis, and Impl	ementation Sch	edule in the
next NSPS Report.		
• If NO send Root Cause Analysis Corrective Action An	alysis and Imr	lementation

• 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 ("H₂O). 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 <u>jfreedman@republicservices.com</u> or Sean Bass at (209)-345-2458 or by email at <u>SBass@scsengineers.com</u>.

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



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.	\Box Yes	🖾 No		
Use of a geomembrane or synthetic cover.	🗆 Yes	🖾 No		
A decommissioned well.	🗆 Yes	🖾 No		
• If YES to <u>ANY</u> of the above, exempt as per 40 CFR 62.16720(a)(3)(iii)/ 40 CFR §63.1958(b).				
• If NO to <u>ALL</u> 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		\square No		
the initial exceedance?				
• 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.				



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 less than 120 days since		
initial exceedance per implementation schedule?		
• If YES, send notification to state agency within 75 days o	of initial exceeda	nce. Include
Root Cause Analysis, Corrective Action Analysis, and Imp	lementation Sch	edule in the
next NSPS Report.		
• If NO send Root Cause Analysis Corrective Action An	alysis and Imr	lementation

• 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

TITLE V SEMI-ANNUAL MONITORING REPORT

SITE:			FACILITY ID#:	
NEWBY ISLAN	D LANDFILL			A9013
REPORTING PERIOD:	from	through	1	
	08/01/2024	-	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 Inrigue 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

TITLE V SEMI-ANNUAL MONITORING REPORT

SITE:			FACILITY ID#:	
NEWBY ISLAN	D LANDFILL			A9013
REPORTING PERIOD:	from	through	ו	
	08/01/2024	-	01/31/2025	

List of Permitted Sources and Abatement Device

Permit Unit Number	Equipment Description
S-#	Description
5.3	Newby Island Sanitary Landfill – Waste Decomposition Process;
5-2	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
SG	Newby Island Sanitary Landfill – Excavating, Bulldozing and
3-0	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.

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, Buildozing, and	Reporting Period: from 08/01/2024 through 01/31/2025	
COMPACTING ACTIVITIES		

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

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

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

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, Buildozing, and	Reporting Period: from 08/01/2024 through 01/31/2025	
COMPACTING ACTIVITIES		

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

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

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.
Temperatu re of Gas	BAAQMD 8-34-414,	Monthly Inspection and	Periodic / Monthly	BAAQMD 8-34-	< 55 °C (< 131 °F), except for components	Continuous	N/A
at Wellhead	501.9 and 505.2	Records		305.2	identified in Condition # 818, Part 3b(i)		

Site: N	Newby Island Landfill	Facility ID#:	A9013
Permitted UI Collection Sys Cover Materia	nit: S-2 Waste Decomposition Process with Gas stem, A-2 and A-3 landfill gas flare; S-5 Waste and a Dumping; S-6 Excavating, Bulldozing, and	Reporting Period:	from 08/01/2024 through 01/31/2025
COMPACTING AC	CTIVITIES		

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
Temperatu	BAAQMD	Monthly	Periodic /	BAAQMD	<63 C (<145 F)	Continuous	N/A
re of Gas	8-34-414,	Inspection and	Monthly	8-34-305	(Alternative wellhead		
at	501.9, 505.2,	Records		and	temperature limit that		
Wellheads	and BAAQMD			BAAQMD	applies only to wells		
	Condition			Condition	specified in BAAQMD		
	10423, part			10423,	Condition # 10423, Part		
	6d(ii)			part 6d(i)	6d(i))		
Gas	BAAQMD	Monthly	Periodic /	BAAQMD	N ₂ < 20%	Continuous	N/A
Concentrat	8-34-414,	Inspection and	Monthly	8-34-	(by volume, dry basis)		
ion at	501.9 and	Records		305.3 or	OR		
Wellhead	505.3 or			305.4	O ₂ < 5%		
	505.4				(Applies to all wells or		
					collectors that are		
					connected to the vacuum		
					system, except wells		
					specified in BAAQMD		
					Condition # 10423, Part		
					6c(i))		

Site:	Newby Island Landfill	Facility ID#:	A901	3
Permitted Collection S Cover Mater	Unit: S-2 Waste Decomposition Process with Gas System, A-2 and A-3 landfill gas flare; S-5 Waste and Rial Dumping; S-6 Excavating, Bulldozing, and	Reporting Period:	from	08/01/2024 through 01/31/2025
COMPACTING	ACTIVITIES			

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
Gas	BAAQMD	Monthly	Periodic /	BAAQMD	O2 < 15%	Continuous	N/A
Concentrat	8-34-414,	Inspection and	Monthly	8-34-305	(Alternative wellhead		
ions at	501.9, and	Records		and	oxygen concentration		
Header	505.3 or			BAAQMD	limit that applies only to		
	505.4, and			Condition	wells specified in		
	BAAQMD			# 10423,	BAAQMD Condition #		
	Condition			Part 6c(i)	10423, Part 6c(i))		
	10423 part						
	6c(ii)						
Well	BAAQMD	Records	Periodic /	BAAQMD	No more than 5 wells at	Continuous	N/A
Shutdown	8-34-116.5		Daily	8-34-	a time or 10% of total		
Limits	and 501.1			116.2	collection system,		
					whichever is less		
Well	BAAQMD	Records	Periodic /	BAAQMD	< 24 hours per well	Continuous	N/A
Shutdown	8-34-116.5		Daily	8-34-			
Limits	and 501.1			116.3			
Well	BAAQMD	Records	Periodic /	BAAQMD	No more than 5 wells at	Continuous	N/A
Shutdown	8-34-117.6		Daily	8-34-	a time or 10% of total		
Limits	and 501.1			117.4	collection system,		
					whichever is less		
Well	BAAQMD	Records	Periodic /	BAAQMD	<24 hours per well or	Continuous	N/A
Shutdown	8-34-117.6		Daily	8-34-	<5 days per well for		
Limits	and 501.1			117.5	component replacement		

Site:	Newby Island Landfill	Facility ID#:	A901	3
Permitted L	Jnit: S-2 WASTE DECOMPOSITION PROCESS WITH GAS	Reporting Period:	from	08/01/2024 through 01/31/2025
COLLECTION S	YSTEM, A-2 AND A-3 LANDFILL GAS FLARE; S-5 WASTE AND			
COVER MATER	IAL DUMPING; S-6 EXCAVATING, BULLDOZING, AND			
COMPACTING A	ACTIVITIES			

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

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

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

Site: N	Newby Island Landfill	Facility ID#:	A9013
Permitted UI Collection Sys Cover Materia	nit: S-2 Waste Decomposition Process with Gas stem, A-2 and A-3 landfill gas flare; S-5 Waste and a Dumping; S-6 Excavating, Bulldozing, and	Reporting Period:	from 08/01/2024 through 01/31/2025
COMPACTING AC	CTIVITIES		

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

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, Buildozing, and	Reporting Period: from 08/01/2024 through 01/31/2025	
COMPACTING ACTIVITIES		

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
Amount of	BAAQMD	Records	Periodic / On	BAAQMD	< 8 cubic yards per	Continuous	N/A
Contamina	8-40-116.2		Event Basis	8-40-	project, provided organic		
ted Soil	and BAAQMD			116.2 and	content		
Aerated or	Condition #			BAAQMD	< 500 ppmw		
Used as	10423,			Condition	and limited to 1 exempt		
Cover	Part 2m			#10423,	project per 3 month		
				Parts 2	period		
				and 3			
Amount of	BAAQMD	Records	Periodic / On	BAAQMD	Prohibited for Soil with	Continuous	N/A
Contamina	Condition #		Event Basis	8-40-301	Organic Content >50		
ted Soil	10423,			and	ppmw unless exempt per		
Aerated or	Part 2m			BAAQMD	BAAQMD 8-40-116, 117,		
Used as				Condition	or 118		
Cover				#10423,			
				Parts 2			
				and 3			
Amount of	None	N/A	None	BAAQMD	Soil Contaminated by	Continuous	N/A
Accidental				8-40-117	Accidental Spillage of		
Spillage				and	< 5 Gallons of Liquid		
				BAAQMD	Organic Compounds		
				Condition			
				# 10423,			
				Parts 2			
				and 3			

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	Reporting Period:	from 08/01/2024 through 01/31/2025
COVER MATERIAL DUMPING; S-6 EXCAVATING, BULLDOZING, AND COMPACTING ACTIVITIES		

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

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

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

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, Buildozing, and	Reporting Period: from 08/01/2024 through 01/31/2025	
COMPACTING ACTIVITIES		

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
NOx	BAAQMD	Annual Source	Periodic /	BAAQMD	Applies to Exhaust Gas	Continuous	N/A
	Condition	Test &	Annual	Condition	from Flares:		
	10423, Part	Records		# 10423,	< 60 ppm corrected to		
	11d			Part 10b	15% oxygen, dry basis		
					(< 0.05 pounds NOx per		
					million BTU LFG)		
H ₂ S	None	N/A	None	BAAQMD	Property Line Ground	Continuous	N/A
				9-2-301	Level Limits:		
					< 0.06 ppm,		
					averaged over 3 minutes		
					and < 0.03 ppm,		
					averaged over 60		
					minutes		
Amount of	BAAQMD	Records	Periodic /	BAAQMD	4,000 tons/day and	Continuous	N/A
Waste	Condition #		Daily	Condition	< 39,000,000 tons		
Accepted	10423,			# 10423,	(predicted cumulative		
	Part 13a			Part 1	amount of all wastes)		
					and		
					< 50,800,000 yd3		
					(cumulative amount of all		
					wastes and cover		
					materials)		
Site: Newby Island Landfill	Facility ID#: A9013						
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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, Buildozing, and	Reporting Period: from 08/01/2024 through 01/31/2025						
COMPACTING ACTIVITIES							

Type of Limit or Criteria	Monitoring Requirement Citation	Monitoring Type	Monitoring Frequency	Citation of Limit	Limit	Compliance	Corrective Actions Taken
Heat Input	BAAQMD	Records	Periodic /	BAAQMD	< 2,006 MM BTU per day	Continuous	N/A
A-1/A-3	Condition #		Daily	Condition	and		
	10423,			# 10423,	< 732,095 MM BTU per		
	Parts 8 and			Part 8	year		
	13h						
Heat Input,	BAAQMD	Records	Periodic /	BAAQMD	< 1,800 MM BTU per day	Continuous	N/A
A-2	Condition #		Daily	Condition	and		
	10423,			# 10423,	< 657,000 MM BTU per		
	Parts 8 and			Part 8	year		
	13h						

Site: Newby Island Landfill				ID#:	A901	3
Permitted	Unit:	S-3 COMPOSTING OPERATION; A-3 WATER TRUCK	Reporti	ng 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

Site:	Newby	Island Landfill	Facili	ty ID#	:	A901	3
Permitted	Unit:	S-4 NON-RETAIL GASOLINE DISPENSING FACILITY	Repo	rting	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

Site:	Newby	Island Landfill	Facility	/ ID#:	A901	3
Permitted	Unit:	S-4 NON-RETAIL GASOLINE DISPENSING FACILITY	Report	ing 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

Site:	Newby	Island Landfill	Facil	ity ID#:	A901	3
Permitted	Unit:	S-4 NON-RETAIL GASOLINE DISPENSING FACILITY	Repo	orting 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

Site: Newby Island Landfill	Facility ID#: A9013
Permitted Unit: S-8 HORIZONTAL GRINDER OPERATIONS/ S-9	Reporting Period: from 08/01/2024 through 01/31/2025
TROMMEL SCREEN/OPERATIONS	

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