

Green For Life Environmental – Zion Landfill December 2022 Monthly Checklist

Based on a review of the monthly operating reports and flare data, there are no deviations to report this month. Flare data and Site Gas Report were also reviewed for the following:

- There were **no** periods (>15 min) of erratic and/or missing data for the OPEN candlestick flare during this reporting period.
- There were **no** extended periods (>15 min) of erratic and/or missing data for the ENCLOSED flare during this reporting period, while the flare was operating.
- There were **no** extraction locations subject to NESHAP requirements, with elevated temperatures or positive pressures beyond 15 days this month. On September 27, 2021 the revised Landfill NESHAP standards became effective and from that date forward the facility is no longer required to comply with the NSPS 5% O₂ operating threshold.
- There were **no** well readings missed during this month.
- There were **two** periods of control device downtime in December. Based on a review of the data, there were **no** periods of downtime when all control devices were not operating which would be defined as the GCCS system not operating. The control devices downtimes will be reported in the next semiannual NESHAP report.
- There were **no** instances when the enclosed flare was operating for more than 3 hours below 1482°F which is 28°C (50°F) below the temperature established in the **July 2019** performance test (1532°F), as required by permit condition 4.1.2.c.ii.D.VI.1.
- Monthly site investigation for security and cover integrity/ACWM/vegetation was conducted as required on **12/19/2022**.
- The Envision meter was field calibrated prior to gas well and gas blower readings included in the Site Monthly Operating Report (MOR); **YES**. Calibration records were available for 12/1, 12/2, 12/5, 12/6, 12/7, 12/8, 12/9, 12/16, 12/19, 12/21, 12/27, 12/29, and 12/30.
- The SSM table included in the Site Gas Report has been completed for each flare/monitoring downtime event. According to the Site Gas Report, there were 6 SSMs at the open (2) and enclosed (4) flares in the month of December. Note that SSM reports are no longer required, but the site continues to track SSM events for NESHAP control device downtime descriptions and work practice standard documentation.
- The fourth quarter surface scan for Zion LF Site 1 (Phases A and B) and Old Site 2 was conducted on **October 14th, 2022**. According to the report, there were no exceedances that measured above the 500-ppm limit. All cover penetration locations were included in the 4Q scan.
- The fourth quarter surface scan for the New (Active) Site was initially conducted on **October 17th, 2022** as required. There were 6 locations identified with surface methane concentrations

detected above the regulatory limit of 500 ppm (above background). The 10-day re-monitoring event occurred on **October 27th, 2022** with only 1 of the locations continuing to measure methane concentrations above 500 ppm. The 2nd 10-day re-monitoring occurred on **November 4th, 2022** with the re-monitored location now measuring below the 500 ppm limit. The 30-day re-monitoring event was conducted on **November 15th, 2022** with all locations continuing to measure below the 500 ppm threshold.

- The annual gas probe monitoring event for 2022 occurred on **November 28, 2022** and **December 6, 2022**. Methane was detected at five of the probes. GMP 5, GMP 16Z1B, GMP 4 measured 0.1% CH₄. GMP 2 and GMP 3 measured 1% CH₄.
- The required annual gas sampling (NMOC, Sulfur, heat content) for laboratory analytical was last collected on **10/11/2022**. Results were received in October.
- Pursuant to condition 4.1.2.b.ii.A.II, the source must determine the LFG sulfur sampling schedule based on the rolling 12-month source-wide SO₂ limit (lbs/hr). If the source exceeds 36.5 lbs/hr it must revert to a quarterly LFG sulfur sampling schedule. As of **December**, the site is at **22.10** lbs/hr.
- The LFG flow meters were last factory calibrated and/or field checked on **September 6, 2022** and installed on **September 20, 2022** (Open Flare FCI 278341); factory calibrated **June 15th, 2022** and installed on **June 29th, 2022** (Enclosed Flare – E+H R9003D16000). Flow meters are required to be calibrated annually.
- Weekly odor inspections were completed on the following days: 12/5, 12/12, 12/19, and 12/29.
- There was **1** citizen odor complaint received this month. **1** complaint was verified by the site. As noted in the log, the complaint was for litter. Complaints submitted directly to the source were evaluated within 72 hours in accordance with 4.1.2.f.ii.C (pg. 51).
- Monthly flare inspections were conducted on **12/19/2022** for the OPEN FLARE and ENCLOSED FLARE to verify proper operations.
- Dust/Visible Emissions inspections from roadway traffic/ACW material were conducted on 12/7, 12/15, 12/19, and 12/29 in accordance with the requirements of 3.1.a.ii.C.II.2 (pg. 17). The required frequency of this inspection is quarterly.
- 20 loads of Friable/RACM and 2 non-friable ACWM loads were received this month.
- LFG (scfm) summary calculations were conducted and are included with the monthly calculation summary.
- NO_x and SO₂ attributed to the vertical and horizontal expansions calculations were conducted as required and will be included with the monthly rolling average calculation summary. Emissions remain below 4 tons/month and 32 tons/year for NO_x and SO₂.
- Monthly rolling average calculations for NO_x, CO, SO₂, PM, PM₁₀, VOM, NMOC, and HAPs were conducted as required.

- Semi-annual gasoline dispensing monitoring took place on 12/1/2022. No issues were noted during the event. The next monitoring event should occur on or before 6/30/2023.
- Annual visible emission tests for the ENCLOSED FLARE and OPEN FLARE occurred on 12/20/2022 and 12/20/2022, respectively. No visible emissions were observed from the Enclosed Flare. During the Open Flare VE test, emissions were recorded during two brief periods of time: 5 seconds and 4 seconds. However, this was substantially less than the 5-minute compliance standard. The next observations are due before 12/31/2023.
- Small engines labeling, annual inventory and semi-annual location log was completed on 10/11/2022. This is due again by 6/30/2023.
- Thermocouple accuracy on the enclosed flare was last reviewed by the site on 9/29/22 by ambient temperature verification. Thermocouple accuracy on the open flare was last reviewed by the site on 9/26/22 by ambient temperature verification. Thermocouple accuracy is verified annually.
- The site's Envision meter was last factory calibrated on October 26th, 2022. It is required to be serviced on an annual basis.
- Verify monthly that site is on track to remain below permitted fee limits. Current permitted fee limits submitted in the September 19, 2019 CAAPP renewal application and the May 7, 2020 Additional Information submittal are: 31.5 tpy NO_x, 37 tpy PM, 162.5 tpy SO₂, 7.5 tpy VOM, and 2 tpy HAPs. As of December, the site remains below the fee limit for 2022.