

## **2005 ANNUAL SOURCE TEST REPORT**

***Kirby Canyon Recycling & Disposal Facility  
Landfill Gas Control – Flare***

***Test Date: January 6, 2005***

***Submittal Date: February 18, 2005***

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***Test Date: January 6, 2005***

***Submittal Date: February 18, 2005***

Prepared for:

Kirby Canyon Recycling & Disposal Facility  
Waste Management of California, Inc.  
910 Coyote Creek Golf Drive  
Morgan Hill, California 95037

For submittal to:

Bay Area Air Quality Management District  
939 Ellis Street  
San Francisco, California 94109

Prepared by:

  
**Shaw EMCN/OWT, Inc.**  
2360 Bering Drive  
San Jose, California 95131-1121

***Project 112184.01000000***

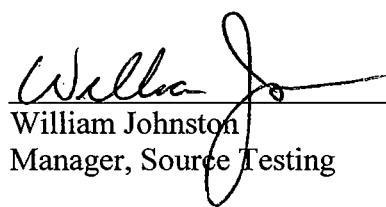
# 2005 ANNUAL SOURCE TEST REPORT

## *Kirby Canyon Recycling & Disposal Facility* *Landfill Gas Control – Flare*

The material and data in this report were reviewed by the undersigned.



**Shaw**™ Shaw Environmental, Inc.

  
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William Johnston  
Manager, Source Testing



**Shaw**™ EMCON/OWT, Inc.

  
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Richard Merrill  
Senior Air Quality Engineer

## **Table of Contents**

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List of Tables.....	iii
List of Figures.....	iii
List of Appendices.....	iii
1.0      Summary and Overview .....	1-1
1.1     Summary.....	1-1
1.2     Overview .....	1-2
1.3     Source Operating Conditions .....	1-2
2.0      Source Test Program .....	2-1
3.0      Source Test Results .....	3-1
4.0      Test Procedures .....	4-1
4.1     Continuous Emissions Monitoring .....	4-1
4.2     Landfill Gas .....	4-3
5.0      Data Review .....	5-1
Limitations.....	L-1

## ***List of Tables***

---

- Table 1. Source Test Information
- Table 2. Compliance Summary Test date: January 6, 2005
- Table 3. Source Test Methods and Instrumentation
- Table 4. Flare Operating Conditions and LFG Analysis Test date: January 6, 2005
- Table 5. Source Test Results — Landfill Flare Exhaust Test date: January 6, 2005
- Table 6. Summary of Results, Landfill Gas Analysis Test date: January 6, 2005
- Table 7. CEMS Instrument Specifications

## ***List of Figures***

- Figure 1. Schematic Diagram of the Shaw CEMS

## ***List of Appendices***

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- Appendix A    Major Facility Review Permit
- Appendix B    Source Test Protocol
- Appendix C    Source Test Data
- Appendix D    Process Data
- Appendix E    Continuous Emission Monitoring Data
- Appendix F    Analytical Results
- Appendix G    ARB Independent Contractor Program Certification
- Appendix H    Site Pictures

## 1.0 Summary and Overview

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### 1.1 Summary

Shaw Environmental, Inc. (Shaw) performed the source testing of the landfill gas flare at the Kirby Canyon Recycling & Disposal Facility, located in Morgan Hill, California. This report presents the results of the test program. Table 1 summarizes the source test information. Table 2 summarizes the test results compared to the permit limits. The flare met all compliance criteria.

**Table 1. Source Test Information**

<b>Test Location:</b>	Kirby Canyon Recycling and Disposal Facility 910 Coyote Creek Golf Drive Morgan Hill, CA 95037	Contact: Edward W. Pettit Waste Management Tel: (408) 779-2206
<b>Source Tested:</b>	Enclosed Gas Flare	
<b>Test Objective:</b>	Determine compliance with Major Facility Review Permit , Facility Number A1812 and Regulation 8, Rule 34 Flare, Source A-11: Permit Condition Number 1437.	Emission Limits: NO <sub>x</sub> : 0.06 lb/MMBtu CO: 0.3 lb/MMBtu SO <sub>2</sub> : 300 ppmv NMOC: Destructive Efficiency greater than 98 percent or 30 ppmv @ 3% O <sub>2</sub> , as methane
<b>Test Performed By:</b>	Shaw Environmental, Inc. 2360 Bering Drive San Jose, CA 95131	Contact: William R. Johnston Tel: (408) 382-5822 Fax: (408) 433-1912
<b>Test Parameters:</b>	<b>Inlet—Landfill Gas</b> O <sub>2</sub> , N <sub>2</sub> , CO <sub>2</sub> , Btu, HHV THC, CH <sub>4</sub> , NMOC, Sulfur Species Landfill gas volumetric flow rate	<b>Outlet—Flare</b> THC, CH <sub>4</sub> , NMOC, NO <sub>x</sub> , CO, SO <sub>2</sub> Volumetric flow rate

**Table 2. Compliance Summary**  
**Test date: January 6, 2005**

Condition	Average Result	ATC Permit Limit	Compliance Status
Heat Input MMBtu/day	809	1,080	In Compliance
NO <sub>x</sub> lb/MMBtu	0.031	0.06	In Compliance
CO lb/MMBtu	0.035	0.30	In Compliance
SO <sub>2</sub> ppmv	3.9	300	In Compliance
NMOC ppmv @ 3% O <sub>2</sub> , dry as methane	< 2.0	30	In Compliance

## **1.2 Overview**

Shaw, an approved California Air Resources Board (ARB) source test contractor, performed the source test program. EMCON/OWT, Inc. (EMCON/OWT), the Solid Waste Management Division of Shaw, reviewed the source test data and report. The test program was designed to demonstrate compliance with the Bay Area Air Quality Management District (BAAQMD) Major Facility Review (MFR) Title V Permit, Facility Number A1812, Condition Number 1437 and Regulation 8, Rule 34 (See Appendix A). The source test was performed on the flare exhaust to assess the emissions of total hydrocarbons (THC), methane (CH<sub>4</sub>), non-methane organic compounds (NMOC), nitrogen oxide (NO<sub>x</sub>), sulfur dioxide (SO<sub>2</sub>), and carbon monoxide (CO). Additionally, a landfill gas (LFG) sample was collected for higher heating value (HHV) and fuel factor (F-Factor).

The source test was conducted on January 6, 2005 and performed by Mr. Bill Johnston of Shaw. The BAAQMD was notified of the test via a letter dated December 27, 2004 that included the Source Test Protocol. The BAAQMD did not have a representative present. A copy of the Source Test Protocol is presented in Appendix B. Source test data are located in Appendix C. A copy of Shaw's ARB Independent Contractor Program certification is included in Appendix G.

The source test program for collecting the required performance data is discussed in Section 2; the source testing results are presented in Section 3; and data review is discussed in Section 4. Supporting documentation is presented in the appendices.

## **1.3 Source Operating Conditions**

The flare is a LFG Specialties Model EF84018 enclosed gas flare with a maximum capacity of 1,480 standard cubic feet per minute (scfm) of LFG and includes a 5 gallons per minute condensate injection system. The flare is operated as a primary landfill gas control device. The flare was operating steadily throughout the test program. A local digital display (data acquisition system) and chart recorder were used to record flare temperatures. Three thermocouples are installed: at the top, middle, and bottom of the flare exhaust stack to provide temperature indication for control of the combustion temperature. The flare operated at an average temperature of 1,497 degrees Fahrenheit (°F) recorded at the top thermocouple.

The flare was fired continuously with LFG. A flow meter incorporating mass thermal flow technology connected to a digital readout and data acquisition system measured a flow of 1,154 scfm. The source test was conducted with the condensate injection system off due to a lack of condensate in the holding tank. Process data documenting the operation of the flare are contained in Appendix D. Pictures of the flare are presented in Appendix H.

Samples were collected at the flare exhaust. The flare has an inner diameter of approximately 96 inches and has two sampling ports that are located at approximately 35 feet above the ground surface.

## 2.0 Source Test Program

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The objective of the flare source test was to demonstrate compliance with requirements of MFR Condition Number 1437 for NO<sub>x</sub>, CO, SO<sub>2</sub> and NMOC. In addition, to satisfy the requirements of the permit, an analysis of the LFG was performed for daily heat input.

Measurements of the flare's emissions were conducted at the flare exhaust. LFG was sampled at the inlet to the flare. Table 3 provides a test matrix of the parameters tested at each sample location. U.S. Environmental Protection Agency (EPA) source test methods were used. The source test program consisted of three 30-minute runs to measure gaseous emissions in the flare exhaust and the inlet to the flare. The continuous emission monitoring system (CEMS) equipment was leak-checked before sampling began. Each instrument was calibrated before and after each sampling run with EPA protocol calibrated gas standards and a gas dilution system. The CEMS data are presented in Appendix E.

Concurrent with the exhaust sampling, Shaw collected integrated 5-liter Tedlar® bag samples of the inlet LFG for analysis of HHV, F-Factor and additional fixed gases. (See Appendix F for analytical laboratory results).

The inlet volumetric flow rate was measured with the LFG mass flow meter and continuously recorded by the data acquisition system. The outlet volumetric flow rate was calculated using the fuel flow rate, HHV, exhaust gas oxygen (O<sub>2</sub>) content, and the F-Factor according to EPA Method 19.

Results of the emission tests for the LFG and flare exhaust are summarized in Tables 4 and 5 respectively, of Section 3. Compliance for NMOC was demonstrated by verifying that the concentrations of NMOC are less than 30 parts per million by volume (ppmv) at 3 percent O<sub>2</sub>, as methane. The source test demonstrated that the flare operates with criteria pollutant emissions below the BAAQMD permit limits. The LFG total reduced sulfur (TRS) results for each run were used to calculate the SO<sub>2</sub> emissions at the flare exhaust.

One bag sample was analyzed for the toxic compounds listed in EPA AP-42, Table 2.4-1, and summarized in Table 6 in Section 3. Analytical results are presented in Appendix F.

**Table 3. Source Test Methods and Instrumentation**

Method	Inlet (fuel) Analyte	Exhaust Analyte	Instrumentation/ Laboratory	Principle
ASTM D-1945/D-3588	Fixed Gases, HHV and F-Factor	—	Zalco Analytical	Chromatographic Analysis
EPA Method 25 C EPA TO 15 ASTM-5504	NMOC Organic Compounds Sulfur Compounds	—	Atmospheric Analysis & Consulting, Inc.	GC/FID/TCA Analysis
EPA Method 10	—	CO	Horiba VIA 510	IR
EPA Method 25A	—	THC/CH <sub>4</sub> /NMOC	TECO Model 51	FID
EPA Method 7E	—	NO <sub>x</sub>	Ecophysics Model 70E	Chemiluminescence
EPA Method 3A	—	O <sub>2</sub>	Teledyne	Fuel Cell
EPA Method 19	—	Flow rate, dscfm	—	Algorithm

Notes:

ASTM = American Society for Testing and Materials

dscfm = dry standard cubic feet per minute

FID = flame ionization detection

GC = Gas Chromatography

TCA= thermal conductivity analyzer

IR = infrared

### 3.0 Source Test Results

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The source test was performed on the LFG fuel and flare exhaust. Table 4 presents the results of the LFG analysis. The LFG sample was drawn from the inlet to the flare and was analyzed for fixed gases, HHV, and F-Factor. Table 5 present the results of the source test. Triplicate 30-minute runs were performed on the flare exhaust to assess the THC, CH<sub>4</sub>, NMOC, NO<sub>x</sub>, and CO emissions. Concurrent with each run, the O<sub>2</sub> content of the exhaust gas was also measured. Concentrations of CO and NO<sub>x</sub> are reported in units of pounds per million British thermal units (lb/MMBtu). Concentrations of SO<sub>2</sub> are reported in units of ppmv. Concentrations of NMOC are reported in units of ppmv corrected to 3 percent O<sub>2</sub>. Because THC concentrations were measured at the THC analyzer reporting limit of 1 ppmv, the methane concentration was not measured.

To comply with Condition Number 1437, Item 13, an LFG gas characterization was performed concurrently with the annual source test. The LFG sample was drawn from the main header to the flare. The Run 2 bag sample was analyzed for the toxic compounds listed in EPA AP-42, Table 2.4-1, and summarized in Table 6. Analytical results are presented in Appendix F. The average gas flow rate to the flare during the test was recorded at 1,154 scfm. This represents approximately 78 percent of the rated flow capacity.

**Table 4. Flare Operating Conditions and LFG Analysis**  
**Test date: January 6, 2005**

	Run 1	Run 2	Run 3	Average
Time	0949-1019	1038-1108	1127-1201	—
Flare Temperature (°F)	1,496	1,497	1,497	1,497
Recorded Fuel Flow Rate (scfm)	1,161	1,153	1,147	1,154
Heat Input MMBtu/day	806	807	813	809
Fuel Factor (dscf/MMBtu) <sup>1</sup>	9,541.2	9,539.9	9,533.8	9,538.3
O <sub>2</sub> (%) <sup>1</sup>	1.5	1.3	1.2	1.3
CO <sub>2</sub> (%) <sup>1</sup>	35.5	35.8	36.1	35.8
N <sub>2</sub> (%) <sup>1</sup>	14.5	13.9	13.1	13.8
Methane (%) <sup>1</sup>	48.5	48.9	49.5	49.0
NMOC (ppmv) <sup>2</sup>	1,404	1,780	2,066	1,750
THC (%) <sup>3</sup>	48.7	49.1	49.7	49.2

<sup>1</sup> Analytical results from Zalco Laboratories, Inc.

<sup>2</sup> Analytical results from Atmospheric Analysis & Consulting, Inc.

<sup>3</sup> Calculated

**Table 5. Source Test Results — Landfill Flare Exhaust**  
**Test date: January 6, 2005**

	Run 1	Run 2	Run 3	Average	Permit
Time	0949-1019	1038-1108	1127-1201	—	—
Fuel Factor	9,541	9,540	9,534	9,538	—
Flare Temperature (°F)	1,496	1,497	1,497	1,497	—
Landfill Gas Fuel Flow Rate (scfm)	1,161	1,153	1,147	1,154	—
Exhaust Flow Rate (dscfm)	12,685	12,558	12,641	12,628	—
O <sub>2</sub> (%)	12.1	12.0	12.0	12.0	—
NO <sub>x</sub>					—
NO <sub>x</sub> (ppmv)	11.6	11.6	11.2	11.5	—
NO <sub>x</sub> (lb/MMBtu)	0.031	0.031	0.030	0.031	0.06
CO					—
CO (ppmv)	18.2	24.8	22.0	21.7	—
CO (lb/MMBtu)	0.030	0.040	0.036	0.035	0.30
SO <sub>2</sub>					—
SO <sub>2</sub> (ppmv) <sup>1</sup>	3.8	3.8	4.3	3.9	300
Hydrocarbons as Methane					—
THC (ppmv)	< 1	< 1	< 1	< 1	—
NMOC (ppmv)	< 1	< 1	< 1	< 1	—
NMOC (ppmv corrected to 3% O <sub>2</sub> as methane)	< 2	< 2	< 2	< 2	30

*Note:*

NO<sub>2</sub> = nitrogen dioxide

<sup>1</sup> SO<sub>2</sub> concentrations were estimated from the analysis of inlet landfill gas.

In the combustion process, sulfur compounds are oxidized to SO<sub>2</sub>. The TRS results in LFG for each run were used to calculate the SO<sub>2</sub> emissions at the flare exhaust. The calculations and concentrations for each run are presented in Appendix C.

**Table 6. Summary of Results, Landfill Gas Analysis**  
**Test date: January 6, 2005**

Organic Compound	Measured Concentration (ppmv)	
1,1,1-Trichloroethane	0.004	J
1,1,2,2-Tetrachloroethane	0.128	
1,1-Dichloroethane	0.103	
1,1-Dichloroethene	0.051	
1,2-Dichloroethane	0.030	
1,2-Dichloropropane	0.014	
Isopropanol	40.8	E
Acrylonitrile	0.120	
Bromodichloromethane	0.040	
Butane	26.0	
Carbon Disulfide	0.043	
Carbon Tetrachloride	0.008	J
Carbonyl Sulfide	<PQL	
Chlorobenzene	0.227	
Chlorodifluoromethane	0.530	
Chloroethane	0.078	
Chloroform	0.0027	J
Chloromethane	0.031	
Dichlorobenzene	ND	
Dichlorodifluoromethane	1.013	
Dichlorofluoromethane	0.194	
Dichloromethane	0.194	
Dimethyl Sulfide	4.50	
Ethane	ND	
Ethanol	199.2	E
Ethyl Mercaptan	0.010	
Ethylbenzene	3.17	
Ethylene dibromide	ND	
Fluorotrichloromethane	0.063	
Hexane	1.52	
Hydrogen Sulfide	33.0	
Methyl Ethyl Ketone	17.8	E

**Table 6. Summary of Results, Landfill Gas Analysis**  
**Test date: January 6, 2005**  
**(concluded)**

Organic Compound	Measured Concentration (ppmv)
Methyl Isobutyl Ketone	1.493
Methyl Mercaptan	2.0
Pentane	69.0
Perchloroethylene	0.483
Propane	40.0
Trans-1, 2-Dichloroethene	0.048
Trichloroethylene	0.216
Vinyl Chloride	0.335
Xylenes	7.09

*Notes:*

*J = Analyte was detected. However, the analyte concentration is an estimated value, which is between the Method Detection Limit (MDL) and the Practical Quantitation Limit (PQL).*

*ND = not detected.*

*E = Estimated value, result outside linear range of instrument.*

## 4.0 Test Procedures

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Shaw conducted the source test according to EPA test methods as described below.

### 4.1 Continuous Emissions Monitoring

Shaw measured stack gas constituent concentrations, using its CEMS sampling van, according to EPA methods for NMOC, NO<sub>x</sub>, CO, and O<sub>2</sub>. Figure 1 is a schematic diagram of the Shaw CEMS.

In this source test, a sample pump was used to extract the sample gas continuously from each source through a stainless-steel sampling probe equipped with an in-stack filter, followed by a heated Teflon™ sample line and a Baldwin sample conditioner. The sample line between the sample point and the sample conditioner was heated to 250°F to maintain the gas stream temperatures above the water dew point. Gas flow was controlled with a back-pressure regulator. The sample flow rate to each instrument was controlled with individual rotameters. Instrument output was recorded with a strip chart recorder and a digital data logger (the STRATA data acquisition system). Table 7 lists the specifications of the instruments used in the source test.

**Table 7. CEMS Instrument Specifications**

Gas	Analyzer/Manufacturer	Principle of Operation	Operating Range
O <sub>2</sub>	Teledyne 326A	Fuel Cell	0-25%
THC	TECO Model 51	Flame Ionization	0-50 ppmv as CH <sub>4</sub>
NO <sub>x</sub>	Ecophysics 70E	Chemiluminescence	0-50 ppmv
CO	Horiba VIA 510	NDIR	0-100 ppmv
Gas Dilution	Environics Model 4000/4040	Calibration date: June 16, 2004	

*Note:*

*NDIR = nondispersive infrared*

Prior to testing, the sampling system was assembled at the site and leak-checked. Calibrations were performed on each of the instruments using certified calibration gases and a gas dilution system. In addition, a field evaluation of the gas dilution system was performed according to EPA Method 205 and an NO<sub>x</sub> converter check was performed.

A span drift check was performed at the end of each run to measure analyzer drift. The drift check measurement uses a zero gas ( $N_2$ ) and a mid-range calibration gas. All of the instruments checks conducted for this source test were within the drift limit criterion of 3 percent, as specified in the test methods. Reported values include a correction for the recorded instrument drift, as specified in EPA Method 6C. Copies of data logger printouts, calibration data sheets, strip charts, gas certificates of analysis, EPA Method 205, and  $NO_x$  converter are presented in Appendix E.

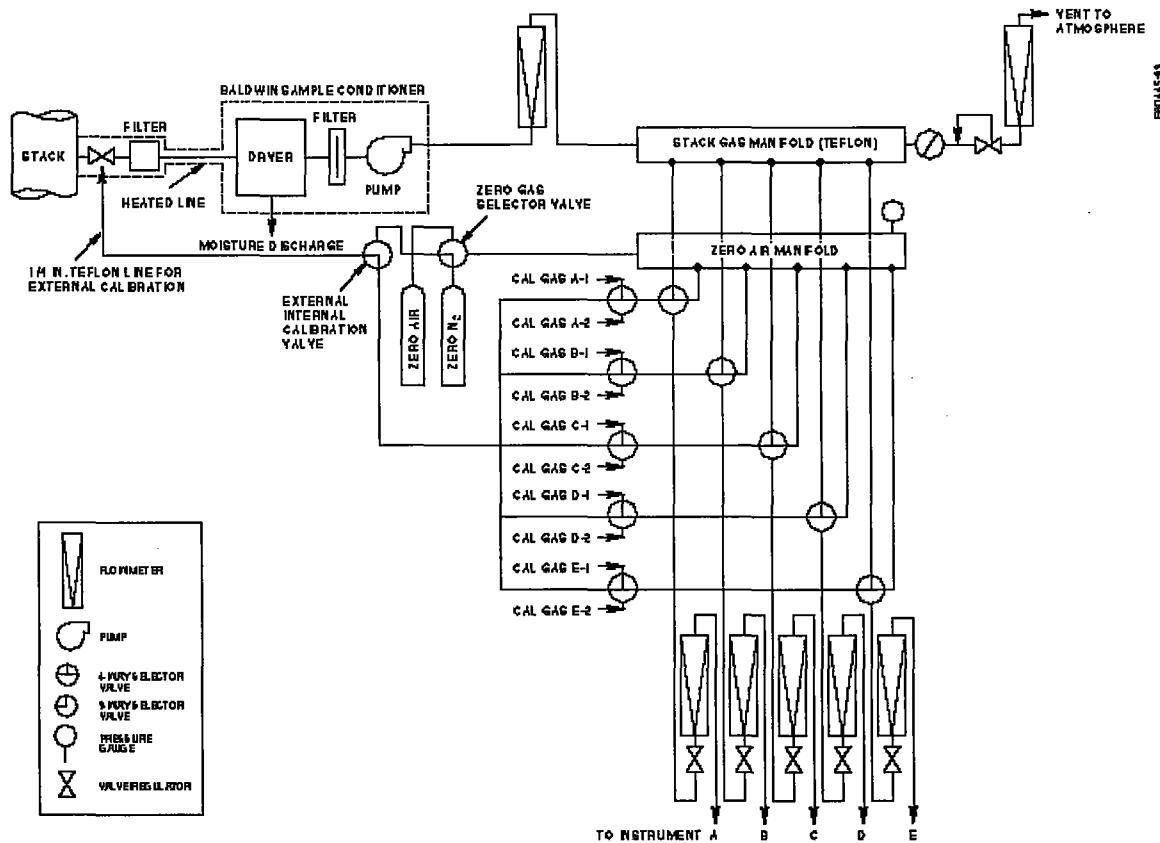


Figure 1. Schematic Diagram of the Shaw CEMS

## **4.2 Landfill Gas**

Shaw measured LFG constituent concentrations according to ASTM test methods. Samples were collected from a sample port located at the flare inlet header. Samples were collected in 5-liter Tedlar® bags under positive pressure through Teflon™ tubing. The sample line was purged with sample gas prior to sampling. The sample flow rate was controlled with rotameters to collect a 30-minute integrated sample. The samples were kept out of sunlight and were analyzed within the method holding times. Analytical results are presented in Appendix F.

## **5.0 Data Review**

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EMCON/OWT performed a quality assurance review of the source test data and report. The review included the following activities:

- Review of the general text
- Check of calculation algorithms for correctness
- Review of CEM data extraction
- Determination that all supporting documentation is present

A detailed manual review of the data was completed. Based on our data review, EMCON/OWT concludes the following:

- The source test procedures were followed, and all data were reduced and entered into the reporting spreadsheets properly.
- The instrument drift and other measures of instrument performance were deemed acceptable.

As a result, the data are considered to be acceptable.

## ***Limitations***

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The services described in this report were performed consistent with generally accepted professional consulting principles and practices. No other warranty, expressed or implied, is made. These services were performed consistent with our agreement with our client. This report is solely for the use and information of our client unless otherwise noted. Any reliance on this report by a third party is at such party's sole risk.

Opinions contained in this report apply to conditions existing when services were performed and are intended only for the client, purposes, locations, time frames, and project parameters indicated. We are not responsible for the impacts of any changes in environmental standards, practices, or regulations subsequent to performance of services. We do not warrant the accuracy of information supplied by others, or the use of segregated portions of this report.

*Appendix A*  
*Major Facility Review Permit*

# Bay Area Air Quality Management District

939 Ellis Street  
San Francisco, CA 94109  
(415) 771-6000

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## FINAL MAJOR FACILITY REVIEW PERMIT

**Issued To:**

**Kirby Canyon Landfill  
Facility #A1812**

**Facility Address:**

910 Coyote Creek Golf Drive  
San Jose, CA 95198

**Mailing Address:**

P.O. Box 1870  
Morgan Hill, CA 95038

**Responsible Official**  
Joe Morse, Site Manager  
(408) 779-2206

**Facility Contact**  
Joe Morse

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**Type of Facility:** Landfill  
**Primary SIC:** 4953  
**Product:** Non-hazardous Solid Waste

BAAQMD Permit Division Contact:  
Ted Hull, Air Quality Engineer II

### ISSUED BY THE BAY AREA AIR QUALITY MANAGEMENT DISTRICT

Signed by Jack P. Broadbent

Jack P. Broadbent, Executive Officer/Air Pollution Control Officer

January 12, 2005

Date

## VI. PERMIT CONDITIONS

Any condition that is preceded by an asterisk is not federally enforceable.

### **Condition #1437**

For: S-1, Active Landfill with Landfill Gas Collection System;

For: A-11, Landfill Gas Flare

1. The Permit Holder shall comply with the following waste acceptance and disposal limits and shall obtain the appropriate New Source Review permit, if one of the following limits is exceeded:
  - a. Except for temporary emergency situations approved by the Local Enforcement Agency, the total waste accepted and placed at the landfill shall not exceed 2600 tons in any day. (Basis: Regulation 2-1-301)
  - b. The total cumulative amount of all waste placed in the landfill shall not exceed 19.84 million tons. Exceedance of the cumulative tonnage limit is not a violation of the permit and does not trigger the requirement to obtain a New Source review permit, if the operator can, within 30 days of the date of discovery of the exceedance, provide documentation to the District demonstrating, in accordance with BAAQMD Regulation 2-1-234.3, that the limit should be higher. (Basis: Regulation 2-1-234.3)
  - c. The maximum design capacity of the landfill (total volume of all wastes placed in the landfill) shall not exceed 36.40 million cubic yards. (Basis: Regulation 2-1-301)
2. Handling Procedures for Soil Containing Volatile Organic Compounds
  - a. The procedures listed below in subparts b-1 do not apply if the following criteria are satisfied. However, the record keeping requirements in subpart m, below, are applicable.
    - i. The Permit Holder has appropriate documentation demonstrating that either the organic content of the soil or the organic concentration above the soil is below the "contaminated" level (as defined in Regulation 8, Rule 40, Sections 205, 207, and 211). The handling of soil containing VOCs in concentrations below the "contaminated" level is subject to Part 3 below.
    - ii. The Permit Holder has no documentation to prove that soil is not contaminated, but source of the soil is known and there is no reason to suspect that the soil might contain organic compounds.

## VI. Permit Conditions

### Condition #1437

For: S-1, Active Landfill with Landfill Gas Collection System;

For: A-11, Landfill Gas Flare

- b. The Permit Holder shall provide verbal notification to the Compliance and Enforcement Division of the Permit Holder's intention to accept contaminated soil at the facility at least 24 hours in advance of receiving the contaminated soil. The Permit Holder shall provide an estimate of the amount of contaminated soil to be received, the degree of contamination (range and average VOC Content), and the type or source of contamination.
- c. Any soil received at the facility that is known or suspected to contain volatile organic compounds (VOCs) shall be handled as if the soil were contaminated, unless the Permit Holder receives test results proving that the soil is not contaminated. To prove that the soil is not contaminated, the Permit Holder shall collect soil samples in accordance with Regulation 8-40-601 within 24 hours of receipt of the soil by the facility. The organic content of the collected soil samples shall be determined in accordance with Regulation 8-40-602.
  - i. If these test results indicate that the soil is still contaminated or if the soil was not sampled within 24 hours of receipt by the facility, the Permit Holder must continue to handle the soil in accordance with the procedures set forth in subparts e-1, below, until the soil has completed treatment or has been placed in a final disposal location and adequately covered. Storing soil in a temporary stockpile or pit is not considered treatment. Co-mingling, blending, or mixing of soil lots is not considered treatment.
  - ii. If these test results indicate that the soil – as received at the facility – has an organic content of 50 ppmw or less, then the soil is no longer contaminated and shall be handled in accordance with the procedures in Part 3 instead of Part 2, subparts e-1.
- d. Any contaminated soil received at the facility shall be clearly identified as contaminated soil, shall be handled in accordance with subparts e-1. below, and shall be segregated from non-contaminated soil. Contaminated soil lots may not be co-mingled, blended, or otherwise mixed with non-contaminated soil lots prior to treatment, reuse, or disposal. Mixing soil lots in an attempt to reduce the overall concentration of the contaminated soil or to circumvent any requirements or limits is strictly prohibited.

## VI. Permit Conditions

### Condition #1437

For: S-1, Active Landfill with Landfill Gas Collection System;

For: A-11, Landfill Gas Flare

- e. On-site handling of contaminated soil shall be limited to no more than 2 on-site transfers per soil lot. For instance, unloading soil from off-site transport vehicles into a temporary storage pile is 1 transfer. Moving soil from a temporary storage to a staging area is 1 transfer. Moving soil from a temporary storage pile to a final disposal site is 1 transfer. Moving soil from a staging area to a final disposal site is 1 transfer. Therefore, unloading soil from off-site transport into a temporary storage pile and then moving the soil from that temporary storage pile to the final disposal site is allowed. Unloading soil from off-site transport into a staging area and then moving the soil from that staging area to the final disposal site is allowed. However, unloading soil from off-site transport to a temporary storage pile, moving this soil to a staging area, and then moving the soil again to a final disposal site is 3 on-site transfers and is not allowed.
- f. If the contaminated soil has an organic content of less than 500 ppmw, the contaminated soil shall be treated, deposited in a final disposal site, or transported off-site for treatment within 90 days of receipt at the facility.
- g. If the contaminated soil has an organic content 500 ppmw or more, the contaminated soil shall be treated, deposited in a final disposal site, or transported off-site for treatment within 45 days of receipt at the facility.
- h. All active storage piles shall meet the requirements of Regulation 8-40-304 by using water sprays, vapor suppressants or approved coverings to minimize emissions. The exposed surface area of any active storage pile (including the active face at a landfill) shall be limited to 6000 ft<sup>2</sup>. The types of storage piles that may become subject to these provisions include (but are not limited to) truck unloading areas, staging areas, temporary stockpiles, soil on conveyors, bulldozers or trucks, the active face of a landfill, or other permanent storage pile at the final disposal location.

## VI. Permit Conditions

### Condition #1437

For: S-1, Active Landfill with Landfill Gas Collection System;

For: A-11, Landfill Gas Flare

- i. All inactive storage piles shall meet the requirements of Regulation 8-40-305 including the requirement to cover contaminated soil during periods of inactivity longer than one hour. The types of storage piles that may become subject to these provisions include (but are not limited to) soil on trucks or other on-site equipment, staging areas, temporary stockpiles, and the permanent storage pile at the final disposal location. District approved coverings for inactive storage piles include continuous heavy-duty plastic sheeting (in good condition, joined at the seams, and securely anchored) or encapsulating vapor suppressants (with re-treatment as necessary to prevent emissions).
- j. The Permit Holder must:
  - i. Keep contaminated soil covered with continuous heavy-duty plastic sheeting (in good condition, joined at the seams, and securely anchored) whenever soil is to be stored in temporary stockpiles or during on-site transport in trucks. Soil in trucks shall not be left uncovered for more than 1 hour.
  - ii. Establish a tipping area for contaminated soils near the active face that is isolated from the tipping area for other wastes.
  - iii. Spray contaminated soil with water or vapor suppressant immediately after dumping the soil from a truck at the tipping area.
  - iv. Ensure that all contaminated soil is transferred from the tipping area to the active face immediately after spraying with water or vapor suppressant.
  - v. Ensure that contaminated soil in the tipping area is not disturbed by subsequent trucks. Trucks shall not drive over contaminated soil in the tipping area or track contaminated soil out of the tipping area on their wheels.
  - vi. Spray contaminated soil on the active face with water or vapor suppressant (to keep the soil visibly moist) until the soil can be covered with an approved covering.
  - vii. Limit the area of exposed soil on the active face to no more than 6000 ft<sup>2</sup>.

## VI. Permit Conditions

### Condition #1437

For: S-1, Active Landfill with Landfill Gas Collection System;

For: A-11, Landfill Gas Flare

- viii. Ensure that contaminated soil spread on the active face is completely covered on all sides with one of the following approved coverings: at least 6 inches of clean compacted soil, at least 12 inches of compacted garbage, or at least 12 inches of compacted green waste.
- ix. Ensure that covering of soil on the active face is completed within one hour of the time that the soil was first dumped from a truck at the tipping area.
- k. Contaminated soil shall not be used as daily, intermediate, or final cover material for landfill waste operations unless the requirements of Regulation 8, Rule 40, Sections 116 or 117 have been satisfied.
- l. Contaminated soil is considered to be a decomposable solid waste pursuant to Regulation 8, Rule 34. All contaminated soil disposed of at a site shall be included in any calculations of the amount of decomposable waste in place that are necessary for annual reporting requirements or for purposes of 8-34-111 or 8-34-304.
- m. The Permit Holder shall keep the following records for each lot of soil received, in order to demonstrate on-going compliance with the applicable provisions of Regulation 8, Rule 40.
  - i. For all soil received by the facility (including soil with no known contamination), record the arrival date at the facility, the soil lot number, the amount of soil in the lot, the organic content or organic concentration of the lot (if known), the type of contamination (if any), and keep copies of any test data or other information that documents whether the soil is contaminated (as defined in 8-40-205) or not contaminated, with what, and by how much.
  - ii. If the soil is tested for organic content after receipt by the facility, record the sampling date, test results, and the date that these results were received.
  - iii. For all on-site handling of contaminated soil, use a checklist or other approved method to demonstrate that appropriate procedures were followed during all on-site handling activities. One checklist shall be completed for each day and for each soil lot (if multiple lots are handled per day).

## VI. Permit Conditions

### Condition #1437

For: S-1, Active Landfill with Landfill Gas Collection System;

For: A-11, Landfill Gas Flare

- iv. For soil aerated in accordance with 8-40-116 or 117 record the soil lot number, the amount of soil in the lot, the organic content, the final placement date, the final placement location, and describe how the soil was handled or used on-site.
- v. For final disposal at a landfill, record on a daily basis the soil lot number, the amount of soil placed in the landfill, the disposal date, and the disposal location.

All records shall be retained for at least 5 years from the date of entry and shall be made available for District inspection upon request.

(basis: Regulations 8-40-301, 8-40-304 and 8-40-305)

- 3. Low VOC soil (soil that contains 50 ppmw or less of VOC) is not considered to be "contaminated soil" and may be used as daily, intermediate, or final cover material for landfill waste operations if the organic concentration above the soil does not exceed 50 ppmv (expressed as methane, C1). To demonstrate compliance with this requirement, each lot of soil to be used as cover material shall be randomly screened for VOC surface emissions (in such a manner as to be representative of the entire lot) using the testing procedures outlined in Regulation 8-40-604. The Permit Holder shall keep the following records for each lot of soil subject to this requirement:
  - a. The soil lot number as established in part 2m.i. (above).
  - b. The time and date of the soil screening.
  - c. The name and affiliation of the person performing the monitoring.
  - d. The results of the screening and an acknowledgement that the procedures outlined in Regulation 8-40-604 were used.Soil presumed to be low VOC soil that is found to have a surface VOC concentration greater than 50 ppmv as described above shall be considered contaminated soil and will be subject to the requirements of part 2 of these conditions. (basis: Regulations 8-40-205, 8-40-604)
- 4. Water and/or dust suppressants shall be applied to all unpaved roadways, active soil removal, and fill areas as necessary to prevent visible particulate emissions. Paved roadways shall be kept sufficiently clear of dirt and debris to prevent visible particulate emissions from vehicle traffic or wind. (basis: Regulations 2-1-403, 6-301, and 6-305)

## VI. Permit Conditions

### Condition #1437

For: S-1, Active Landfill with Landfill Gas Collection System;

For: A-11, Landfill Gas Flare

5. All collected landfill gas shall be vented to properly operating abatement equipment including the Landfill Gas Flare (A-11) and/or the IC Engines (S-5, S-6, and S-7)). Raw landfill gas shall not be vented to the atmosphere, except for unavoidable landfill gas emissions that occur during collection system installation, maintenance, or repair that is performed in compliance with Regulation 8, Rule 34, Sections 113, 116, 117, or 118 and for component or surface leaks that do not exceed the limits specified in 8-34-301.2 or 8-34-303. (basis: Regulation 8-34-301)
6. The Permit Holder shall apply for and receive an Authority to Construct before modifying the landfill gas collection system described in Parts 6a-b below. Increasing or decreasing the number of wells or collectors, changing the length of collectors, or changing the locations of wells or collectors are all considered to be modifications that are subject to the Authority to Construct requirement.
  - a. The Permit Holder has been issued a Permit to Operate for the landfill gas collection system components listed below. Well and collector locations, depths, and lengths are as described in detail in Permit Applications #2232 and #7835.

Current

Total Number of Gas Wells:

34

- b. The Permit Holder has been issued an Authority to Construct for the additional landfill gas collection system components listed below. Specific well locations, depths, and lengths of associated piping are as described in detail in Permit Application #7853. After receiving a written start-up notification for any wells or collectors that have been installed, the APCO will revise the number of wells listed in Parts 6a and 6b using the minor permit amendment procedures identified in Regulation 2-6-414.

Proposed

Additional Number of Gas Wells:

2

(basis: Regulations 2-1-301, 8-34-301.1, 8-34-304, 8-34-305)

7. The landfill gas collection system described in Part 6a shall be operated continuously as defined in Regulation 8-34-219. Wells shall not be shut off, disconnected or removed from operation without written authorization from the APCO, unless the Permit Holder complies with all applicable requirements of Regulation 8, Rule 34, Sections 113, 116, 117, and 118. (basis: Regulation

## VI. Permit Conditions

8-34-301.1)

### Condition #1437

For: S-1, Active Landfill with Landfill Gas Collection System;  
For: A-11, Landfill Gas Flare

8. The heat input to the A-11 Landfill Gas Flare shall not exceed 1,080 million BTU per day and shall not exceed 394,200 million BTU per year. In order to demonstrate compliance with this part, the Permit Holder shall calculate and record, on a monthly basis, the maximum daily and total monthly heat input to the flare based on: (a) the landfill gas flow rate recorded pursuant to part 14h, (b) the average methane concentration in the landfill gas measured in most recent source test, and (c) a high heating value for methane of 1013 BTU per cubic foot at 60 degrees F. (basis: Regulation 2-1-301)
9. The minimum combustion zone temperature of the Flare A-11 shall be determined by the results of the most recent source test in which compliance with all applicable requirements was demonstrated. The minimum combustion zone temperature shall be the average temperature measured during the complying source test minus 50 degrees F. Once the minimum temperature has been established, it shall be maintained during all periods of flare operation. Compliance with the temperature limit shall be based on a 3-hour averaging period. Under no circumstances shall the minimum flare temperature be less than 1,400 degrees F. Based on the results of required source testing of the flare, the APCO may add an explicit temperature limit to the conditions for the Flare A-11 in accordance with the procedures identified in Regulation 2-6-414 or 2-6-415. (Basis: Regulation 8-34-301.3)
10. Emissions of Nitrogen Oxides (NOx) from the Flare A-11 shall not exceed 0.06 pounds per million BTU (calculated as NO<sub>2</sub>). (basis: RACT and Offsets)
11. Emissions of Carbon Monoxide (CO) from the Flare A-11 shall not exceed 0.3 pounds per million BTU. (basis: RACT and Offsets).
12. To demonstrate compliance with Regulation 8, Rule 34, Sections 301.3 and 412, and the above requirements, the Permit Holder shall ensure that a District approved source test is conducted annually on the Landfill Gas Flare (A-11). The annual source test shall determine the following:

## VI. Permit Conditions

### Condition #1437

For: S-1, Active Landfill with Landfill Gas Collection System;

For: A-11, Landfill Gas Flare

- a. landfill gas flow rate to the flare (dry basis);
- b. concentrations (dry basis) of carbon dioxide (CO<sub>2</sub>), nitrogen (N<sub>2</sub>), oxygen (O<sub>2</sub>), total hydrocarbons (THC), methane (CH<sub>4</sub>), and total non-methane organic compounds (NMOC) in the landfill gas;
- c. stack gas flow rate from the flare (dry basis);
- d. concentrations (dry basis) of nitrogen oxides (NOx), carbon monoxide (CO), THC, CH<sub>4</sub>, NMOC, SO<sub>2</sub>, and O<sub>2</sub> in the flare stack gas;
- e. the NMOC destruction efficiency achieved by the flare; and
- f. the average combustion temperature in the flare during the test period.

Annual source tests shall be conducted no earlier than 9 months and no later than 12 months after the previous source test. The Source Test Section of the District shall be contacted to obtain approval of the source test procedures at least 14 days in advance of each source test. The Source Test Section shall be notified of the scheduled test date at least 7 days in advance of each source test. The source test report shall be submitted to the Compliance and Enforcement Division and to the Source Test Section within 60 days of the test date. This testing shall also be used to determine compliance with the SO<sub>2</sub> requirements of Regulation 9-1-302 for the IC Engine Generator Sets S-5, S-6, and S-7. For this purpose, the SO<sub>2</sub> concentration shall be corrected to zero percent oxygen. (basis: RACT, Regulations 2-1-301, 8-34-301.3, 8-34-412, and 9-1-302)

13. The Permit Holder shall conduct a characterization of the landfill gas concurrent with the annual source test required by part 11 above. The landfill gas sample shall be drawn from the main landfill gas header. In addition to the compounds listed in part 11b, the landfill gas shall be analyzed for all the compounds listed in the most recent version of EPA's AP-42 Table 2.4-1 excluding acetone, carbon monoxide, and mercury. All concentrations shall be reported on a dry basis. The test report shall be submitted to the Compliance and Enforcement Division within 45 days of the test date. After conducting three annual landfill gas characterization tests, the Permit Holder may request to remove specific compounds from the list of compounds to be tested for if the compounds have not been detected, have no significant impact on the cancer risk determination for the site, and have no significant impact on the hazard index determination for the site. (basis: Toxic Risk Management Policy and Regulation 8-34-412)

## VI. Permit Conditions

### Condition #1437

For: S-1, Active Landfill with Landfill Gas Collection System;

For: A-11, Landfill Gas Flare

- \*14. The landfill gas condensate injection rate shall not exceed 5 gallons per minute. Total landfill gas condensate injection throughput shall not exceed 375,000 gallons during any consecutive twelve-month period. The Permit Holder for S-1 and A-11 may submit a written petition to the District to increase the landfill gas condensate injection rate subject to current District-approved source test results. (basis: Toxic Risk Management Policy)
- 15. To demonstrate compliance with the above conditions, the Permit Holder shall maintain the following records in a District approved logbook.
  - a. The total amount of municipal solid waste received at S-1 recorded on a daily basis. A summary of the daily waste acceptance records for each calendar month.
  - b. For each area or cell that is not controlled by a landfill gas collection system, a record of the date that waste was initially placed in the area or cell. The cumulative amount of waste placed in each uncontrolled area or cell recorded on a monthly basis.
  - c. If the Permit Holder plans to exclude an uncontrolled area or cell from the collection system requirement, the Permit Holder shall also record the types and amounts of all non-decomposable waste placed in the area and the percentage (if any) of decomposable waste placed in the area.
  - d. Low VOC soil screening data, pursuant to part 3.
  - e. The dates, locations, and frequency per day of all watering activities on unpaved roads or active soil or fill areas. The dates, locations, and type of any dust suppressant applications. The dates and description of all paved roadway cleaning activities. All records shall be summarized monthly.
  - f. The initial operation date for each new landfill gas well and collector.
  - g. An accurate map of the landfill that indicates the locations of all refuse boundaries and the locations of all wells and collectors (using unique identifiers) that are required to be operating continuously pursuant to part 6a. Any areas containing only non-decomposable waste shall be clearly identified. This map shall be updated at least once a year to indicate changes in refuse boundaries and to include any newly installed wells and collectors.
  - h. The operating times and the landfill gas flow rate to the A-11 Landfill Gas Flare recorded on a daily basis. A monthly summary of the heat input to A-11, pursuant to part 8 shall be calculated and recorded.
  - i. Continuous records of the combustion zone temperature for the A-11 Landfill Gas Flare during all hours of operation.

## VI. Permit Conditions

### Condition #1437

For: S-1, Active Landfill with Landfill Gas Collection System;

For: A-11, Landfill Gas Flare

- j. Records of all test dates and test results performed to maintain compliance with parts 12 and 13 above or any applicable rule or regulation.
- k. Records of landfill gas condensate injection throughput and the duration of the injection recorded daily.

All records shall be maintained on site or shall be made readily available to District staff upon request for at least 5 years from the date of entry. These recordkeeping requirements do not replace the recordkeeping requirements contained in any applicable rules or regulations.

(basis: Cumulative Increase, 2-1-301, 2-6-501, 6-301, 6-305, 8-2-301, 8-34-301, 8-34-304, 8-34-501, and 9-1-302)

16. The annual report required by BAAQMD Regulation 8-34-411 shall be submitted in two semi-annual increments. The reporting period for the first increment of the Regulation 8-34-411 annual report that is submitted subsequent to the issuance of the MFR Permit for this site shall be from December 1, 2002 through August 31, 2003. This first increment report shall be submitted by September 30, 2003. The reporting periods and report submittal due dates for all subsequent increments of the Regulation 8-34-411 report shall be synchronized with the reporting periods and report submittal due dates for the semi-annual MFR Permit monitoring reports that are required by Section I.F. of the MFR Permit for this site. (basis: Regulation 8-34-411 and 40 CFR Part 63.1980(a))

### Condition #21582

For: S-3, S-4; Diesel IC Engines for Flare Generator and Trash Pump

1. The Diesel Engines S-3 and S-4 shall each be limited to 3,120 hours per year of operation. (basis: Offsets)
2. Only low sulfur fuel (<0.5% sulfur by weight) shall be combusted at S-3 and S-4. The maximum sulfur content of the fuel shall be demonstrated by vendor certification. (basis: Regulation 9-1-304)

## VII. APPLICABLE LIMITS & COMPLIANCE MONITORING REQUIREMENTS

This section has been included to summarize the applicable emission limits contained in Section IV, Source-Specific Applicable Requirements, of this permit. The following tables show the relationship between each emission limit and the associated compliance monitoring provisions, if any. The monitoring frequency column indicates whether periodic (P) or continuous (C) monitoring is required. For periodic monitoring, the frequency of the monitoring has also been shown using the following codes: annual (A), quarterly (Q), monthly (M), weekly (W), daily (D), or on an event basis (E). No monitoring (N) has been required if the current applicable rule or regulation does not require monitoring, and the operation is unlikely to deviate from the applicable emission limit based upon the nature of the operation.

**Table VII – A**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S-1 ACTIVE LANDFILL**  
**A-11 LANDFILL GAS FLARE**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
Collection System Installation Dates	BAAQMD 8-34-304.1	Y		For Inactive/Closed Areas: collection system components must be installed and operating by 2 years + 60 days after initial waste placement	BAAQMD 8-34-501.7 and 501.8 and BAAQMD Condition #1437, Parts 15b-c and 15f-g	P/E	Records
Collection System Installation Dates	BAAQMD 8-34-304.2	Y		For Active Areas: Collection system components must be installed and operating by 5 years + 60 days after initial waste placement	BAAQMD 8-34-501.7 and 501.8 and BAAQMD Condition #1437, Parts 15b-c and 15f-g	P/E	Records

## VII. Applicable Limits and Compliance Monitoring Requirements

**Table VII – A**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S-1 ACTIVE LANDFILL**  
**A-11 LANDFILL GAS FLARE**

Type of Limit	Citation of Limit	EE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
Collection System Installation Dates	BAAQMD 8-34-304.3	Y		For Any Uncontrolled Areas or Cells: collection system components must be installed and operating within 60 days after the uncontrolled area or cell accumulates 1,000,000 tons of decomposable waste	BAAQMD 8-34-501.7 and 501.8 and BAAQMD Condition #1437, Parts 15a-c and 15f-g	P/E	Records
Gas Flow	BAAQMD 8-34-301 and 301.1	Y		Landfill gas collection system shall operate continuously and all collected gases shall be vented to a properly operating control system	BAAQMD 8-34-501.10 and 508	C	Gas Flow Meter and Recorder (every 15 minutes)
Gas Flow	BAAQMD Condition #1437, Parts 5, 6, and 7	Y		Landfill gas collection system shall operate continuously and all collected gases shall be vented to a properly operating control system	BAAQMD Condition #1437, Parts 15f-h	P/D	Records of Landfill Gas Flow Rates, Collection and Control Systems Downtime, and Collection System Components
Collection and Control Systems Shutdown Time	BAAQMD 8-34-113.2	Y		Less than 240 hours/year and less than 5 consecutive days	BAAQMD 8-34-501.1	P/D	Operating Records

## VII. Applicable Limits and Compliance Monitoring Requirements

**Table VII – A**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S-1 ACTIVE LANDFILL**  
**A-11 LANDFILL GAS FLARE**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
Periods of Inoperation for Parametric Monitors	BAAQMD 1-523.2	Y		15 consecutive days/incident and 30 calendar days/12 month period	BAAQMD 1-523.4	P/D	Operating Records for All Parametric Monitors
Continuous Monitors	40 CFR 60.13(e)	Y		Requires Continuous Operation except for breakdowns, repairs, calibration, and required span adjustments	40 CFR 60.7(b)	P/D	Operating Records for All Continuous Monitors
Wellhead Pressure	BAAQMD 8-34-305.1	Y		< 0 psig	BAAQMD 8-34-414, 501.9 and 505.1	P/M	Monthly Inspection and Records
Temperature of Gas at Wellhead	BAAQMD 8-34-305.2	Y		< 55 °C	BAAQMD 8-34-414, 501.9 and 505.2	P/M	Monthly Inspection and Records
Gas Concentrations at Wellhead	BAAQMD 8-34-305.3 or 305.4	Y		N <sub>2</sub> < 20% OR O <sub>2</sub> < 5%	BAAQMD 8-34-414, 501.9 and 505.3 or 505.4	P/M	Monthly Inspection and Records
Well Shutdown Limits	BAAQMD 8-34-116.2	Y		No more than 5 wells at a time or 10% of total collection system, whichever is less	BAAQMD 8-34-116.5 and 501.1	P/D	Records
Well Shutdown Limits	BAAQMD 8-34-116.3	Y		24 hours per well	BAAQMD 8-34-116.5 and 501.1	P/D	Records
Well Shutdown Limits	BAAQMD 8-34-117.4	Y		No more than 5 wells at a time or 10% of total collection system, whichever is less	BAAQMD 8-34-117.6 and 501.1	P/D	Records

## VII. Applicable Limits and Compliance Monitoring Requirements

**Table VII – A**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S-1 ACTIVE LANDFILL**  
**A-11 LANDFILL GAS FLARE**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
Well Shutdown Limits	BAAQMD 8-34-117.5	Y		24 hours per well	BAAQMD 8-34-117.6 and 501.1	P/D	Records
TOC (Total Organic Compounds Plus Methane)	BAAQMD 8-34-301.2	Y		1000 ppmv as methane (component leak limit)	BAAQMD 8-34-501.6 and 503	P/Q	Quarterly Inspection of collection and control system components with OVA and Records
TOC	BAAQMD 8-34-303	Y		500 ppmv as methane at 2 inches above surface	BAAQMD 8-34-415, 416, 501.6, 506 and 510	P/M, Q, and E	Monthly Visual Inspection of Cover, Quarterly Inspection with OVA of Surface, Various Reinspection Times for Leaking Areas, and Records
Non-Methane Organic Compounds (NMOC)	BAAQMD 8-34-301.3	Y		98% removal by weight OR < 30 ppmv, dry basis @ 3% O <sub>2</sub> , expressed as methane (applies to A-11 Flare only)	BAAQMD 8-34-412 and 8-34-501.4 and BAAQMD Condition #1437, Part 11	P/A	Initial and Annual Source Tests and Records

## VII. Applicable Limits and Compliance Monitoring Requirements

**Table VII – A**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S-1 ACTIVE LANDFILL**  
**A-11 LANDFILL GAS FLARE**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
Temperature of Combustion Zone (CT)	BAAQMD Condition #1437, Part 9	Y		CT $\geq$ 1400 °F, averaged over any 3-hour period (applies to A-11 Flare only)	BAAQMD 8-34-501.3 and 507, and BAAQMD Condition #1437, Part 15i	C	Temperature Sensor and Recorder (continuous)
Total Carbon	BAAQMD 8-2-301	Y		15 pounds/day or 300 ppm, dry basis (applies only to aeration of or use as cover soil of soil containing $\leq$ 50 ppmw of volatile organic compounds)	BAAQMD Condition # 1437, Part 15d	P/E	Inspection with Portable Organic Vapor Analyzer and Records
Amount of Contaminated Soil Aerated or Used as Cover	BAAQMD 8-40-116.1 and BAAQMD Condition # 1437, Part 2	Y		1 cubic yard per project	BAAQMD Condition # 1437, Part 2m	P/E	Records
Amount of Contaminated Soil Aerated or Used as Cover	BAAQMD 8-40-116.2 and BAAQMD Condition #1437, Part 2	Y		8 cubic yards per project, provided organic content $\leq$ 500 ppmw and limited to 1 exempt project per 3 month period	BAAQMD 8-40-116.2 and BAAQMD Condition # 1437, Part 2m	P/E	Records
Amount of Contaminated Soil Aerated or Used as Cover	BAAQMD 8-40-301 and BAAQMD Condition #1437, Part 2	Y		Prohibited for Soil with Organic Content $>$ 50 ppmw unless exempt per BAAQMD 8-40-116, 117, or 118	BAAQMD Condition # 1437, Part 2m	P/E	Records

## VII. Applicable Limits and Compliance Monitoring Requirements

**Table VII – A**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S-1 ACTIVE LANDFILL**  
**A-11 LANDFILL GAS FLARE**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
Amount of Accidental Spillage	BAAQMD 8-40-117 and BAAQMD Condition # 1437, Part 2	Y		Soil Contaminated by Accidental Spillage of $\leq 5$ Gallons of Liquid Organic Compounds	None	N	N/A
Total Aeration Project Emissions	BAAQMD 8-40-118 and BAAQMD Condition # 1437, Part 2	Y		150 pounds per project and toxic air contaminant emissions per year <BAAQMD Table 2-1-316 limits	BAAQMD Condition #1437, Part 2m	P/E	Records
Low VOC Soil	BAAQMD Condition # 1437, Part 3	Y		Soil with Organic Vapor Concentration $\leq 50$ ppmv Acceptable as Cover Material	BAAQMD 8-40-604 and BAAQMD Condition # 1437, Part 3	P/E	Surface Organic Vapor Monitoring
Opacity	BAAQMD 6-301	Y		Ringelmann No. 1 for < 3 minutes/hr (applies to S-1 Landfill operations)	BAAQMD Condition #1437, Part 15e	P/E, M	Records of all site watering and road cleaning events
Opacity	BAAQMD 6-301	Y		Ringelmann No. 1 for < 3 minutes/hr (applies to A-11 Flare)	None	N	N/A
FP	BAAQMD 6-310	Y		$\leq 0.15$ grains/dscf (applies to A-11 Flare only)	None	N	N/A

## VII. Applicable Limits and Compliance Monitoring Requirements

**Table VII – A**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S-1 ACTIVE LANDFILL**  
**A-11 LANDFILL GAS FLARE**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
SO <sub>2</sub>	BAAQMD 9-1-301	Y		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 A-11 Flare only)	None	N	N/A
SO <sub>2</sub>	BAAQMD Regulation 9-1-302	Y		≤ 300 ppm (dry basis) (applies to A-11 Flare only)	BAAQMD Condition #1437, Part 12	P/A	Annual Source Test
H <sub>2</sub> S	BAAQMD 9-2-301	N		Property Line Ground Level Limits: ≤ 0.06 ppm, averaged over 3 minutes and ≤ 0.03 ppm, averaged over 60 minutes	None	N	N/A
NOx	BAAQMD Condition #1437, Part 10	Y		≤ 0.06 lb/MMBTU (calculated as NO <sub>2</sub> )	BAAQMD Condition #1437, Part 12	P/A	Annual Source Test
CO	BAAQMD Condition #1437, Part 11	Y		≤ 0.3 lb/MMBTU	BAAQMD Condition #1437, Part 12	P/A	Annual Source Test
Amount of Waste Accepted	BAAQMD Condition #1437, Part 1	Y		≤ 2600 tons/day (except for temporary situations approved by the LEA) and ≤ 19,840,000 tons (cumulative amount of all wastes) and ≤ 36,400,000 yd <sup>3</sup> (cumulative amount of all wastes)	BAAQMD Condition #1437, Part 15a	P/D	Records

## VII. Applicable Limits and Compliance Monitoring Requirements

**Table VII – A**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S-1 ACTIVE LANDFILL**  
**A-11 LANDFILL GAS FLARE**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
Heat Input	BAAQMD Condition #1437, Part 8	Y		≤ 1,080 MM BTU per day and ≤ 394,200 MM BTU per year (applies to A-11 Flare only)	BAAQMD Condition #1437, Part 8	P/D	Records
Landfill Gas Condensate Injection in Flare	BAAQMD Condition #1437, Part 14	N		≤ 5 gallons per minute ≤ 375,000 gallons per year	BAAQMD Condition #1437, Part 15k	P/D	Records
Startup Shutdown or Mal-function Procedures	40 CFR 63.6(e)	Y	1/16/04	Minimize Emissions by Implementing SSM Plan	40 CFR 63.1980(a-b)	P/E	Records (all occurrences, duration of each, corrective actions)

*Appendix B*  
*Source Test Protocol*



**Shaw Environmental, Inc.**

2360 Bering Drive  
San Jose, California 95131  
408-382-5800  
FAX: 408-433-1912

**Shaw™ Shaw Environmental, Inc.**

**VIA FAX 415-749-4922**

To: Ken Kunaniec, BAAQMD  
Subject: Source Test Protocol & Test Notification

Date: December 27, 2004

**SOURCE TEST PROTOCOL  
FOR  
KIRBY CANYON LANDFILL  
FLARE**

Shaw Environmental, Inc. (Shaw) will perform compliance testing on one landfill gas flare (A-11) at the Kirby Canyon Recycling and Disposal Facility (KCRDF) in San Jose, California. The purpose of the test is to demonstrate the performance of the landfill gas flare as specified by the Bay Area Air Quality Management District (BAAQMD) Major Facility Review (MFR) Title V permit and Regulation 8, Rule 34. This protocol is to inform the BAAQMD of the planned test date and testing procedures. Shaw is approved by the California Air Resources Board (ARB) as an independent contractor to conduct compliance emission testing.

**Source Test Information**

Test Location:	Kirby Landfill 910 Coyote Creek Morgan Hill, CA 95198 BAAQMD MFR Number A1812	Contact: Mr. Eddie Petite 408-779-2206 (Waste Management)
Source to be Tested:	Flare A-11	
Test Objective:	Determine compliance with Title V Permit and Regulation 8, Rule 34 Flare: Permit Condition Number 1437	Emission Limits: NO <sub>x</sub> : 0.06 lb/MMBtu CO: 0.2 lb/MMBtu SO <sub>2</sub> : 300 ppm NMOC: > 98% destruction efficiency or 30 ppm as methane at 3 % O <sub>2</sub>
Test to be Performed By:	Shaw Environmental, Inc. 2360 Bering Drive San Jose, CA 95131	Contact: Bill Johnston Tel: (408) 382-5800
Test Parameters:	Inlet O <sub>2</sub> , CO <sub>2</sub> , N <sub>2</sub> , BTU, HHV THC, CH <sub>4</sub> , NMOC, Sulfur Species, VOCs, landfill gas flow rate	Outlet THC, CH <sub>4</sub> , NMOC, NO <sub>x</sub> , CO, SO <sub>2</sub> Volumetric flow rate

## SOURCE DESCRIPTION

The flare is a LFG Specialties Model EF8 4018, 1,480 scfm capacity enclosed gas flare with a 5 GPM condensate injection system. The flare is designated by the BAAQMD as abatement device A-11. A Yokogawa data acquisition system with local digital display and recorder provides the record of flare temperatures and inlet flow rates.

## SCOPE OF WORK

A source test will be performed on one flare (A-11) located at the Kirby Canyon Landfill. The flare source test shall determine the following parameters as specified in the facility's Title V permit condition number A1812 and BAAQMD Regulation 8, Rule 34. The following conditions, specified in the referenced Permit, will be met.

- Condition 1437, items 10 and 12d: NOx emissions from the flare shall not exceed 0.06 pounds per million Btu (lb/MMBtu);
- Condition 1437, items 11 and 12d: CO emissions from the flare shall not exceed 0.2 lb/MMBtu;
- Condition 1437, item 12: The source test will determine the following:
  - Landfill gas flow rate to the flare, item 12a
  - Landfill Gas fuel analysis: for Btu/cubic foot of gas, higher heating value (HHV), C<sub>1</sub> through C<sub>6</sub> hydrocarbons, sulfur species, O<sub>2</sub>, CO<sub>2</sub>, and N<sub>2</sub>, item 12b
  - Stack gas flow rate, item 12c
  - Concentrations (dry basis) of THC, CH4, NMOC, SO<sub>2</sub>, and O<sub>2</sub> in the flare stack gas, item 12d
  - The flare destruction efficiency of total non-methane organic compounds (NMOC) shall not be less than 98 percent by weight, unless the outlet NMOC concentration is less than 30 ppmv, expressed as methane at 3 percent oxygen on a dry basis, item 12e
  - The average combustion temperature in the flare. As per Condition 1437, items 9 and 12f, temperature and fuel flow rate shall be recorded over the period of the source test. The source test should be conducted at the minimum combustion zone temperature allowed by the BAAQMD (1450 degrees Fahrenheit) or greater if necessary.
- Condition 1437, item 12 and Rule 9-1-302: SO<sub>2</sub> emissions from the flare shall not exceed 300 ppmv;
- Condition 1437, item 13: a characterization of the landfill gas for all the compounds listed in EPA AP-42, Table 2.4-1 excluding acetone, CO and mercury.

## TEST PROCEDURES

The following source test methods (each compliant with the requirements of the BAAQMD) will be utilized to determine the emissions from the flare while the condensate injection system is operating:

- Triplicate landfill gas fuel analysis: ASTM D 1945/3588 for Btu/cubic foot of gas, HHV, C<sub>1</sub> through C<sub>6</sub> hydrocarbons, inclusive, O<sub>2</sub>, CO<sub>2</sub>, and N<sub>2</sub>; H<sub>2</sub>S, sulfur species by ASTM D-5504; and landfill organic constituents by TO-15 (only one sample will be analyzed for TO 15 compounds).
- Three (3) thirty-minute test runs will be performed for NOx, CO, NMOC and SO<sub>2</sub>. Testing will be performed according to EPA test methods. SO<sub>2</sub> concentrations will not be measured but calculated from the analysis of sulfur species from the landfill gas.

- EPA Method 19: volumetric flow rate at the flare exhaust
- Triplicate integrated samples for the inlet concentration of NMOC by EPA Method 25C, if required

### **Landfill Gas Fuel Analysis**

Integrated Tedlar bag samples will be collected at the inlet to the flare. Samples will be collected concurrently with the outlet sampling. Samples will be analyzed within 72 hours (48 hrs for sulfur). One sample will be collected and analyzed for speciated organics. The sulfur result will be used as a surrogate for monitoring sulfur dioxide in the exhaust gas.

### **Continuous Emission Monitoring**

Single point sampling will be performed. The stratification test performed during the 2004 source test demonstrated that no stratification exists in the flare. All analyzers will be checked for calibration before and after each run. Emission monitoring data will be recorded on strip charts and a data logger. Methane concentrations will be determined by passing sample gas through an activated carbon scrubber prior to the hydrocarbon analyzer. Hydrocarbon emissions will be measured and reported as methane.

### **Process Parameters**

Flare process parameters including the fuel gas flow rate and the flare operating temperature will be measured and recorded during each run using the flare gas measurement system.

## **REPORT**

The final report is due to the BAAQMD 45 days after testing has occurred. The report will describe the tests that were conducted, the operating conditions of the source during the test, and the emission results reported in units of the appropriate standard. All raw data and sample calculations used to obtain the reported results will be included so that the accuracy of the reported results can be verified from the report. The flare process information will be submitted in the report.

## **TEST SCHEDULE**

The source test is scheduled for January 6, 2005.

*Appendix C*  
*Source Test Data*

*Emission Rate Calculations*  
*Stack Gas Flow Rate and Fuel Usage, EPA Method 19*

## EMISSION RATE CALCULATION

Facility: Kirby  
 Source : Flare  
 Test date: 1/6/2005

Temperature Std: 70  
 Pressure Std: 29.92  
 O2% correction: 3

Time	0949-1019		1038-1108		1127-1201		Avg	Permit Limits
	Inlet	Outlet	Inlet	Outlet	Inlet	Outlet		
<b>Flare Temp (F)</b>	1,496		1,497		1,497		1,497	
<b>Fuel factor</b>	9,541		9,540		9,534		9,538	
<b>Oxygen (%)</b>		12.1		12.0		12.0		
<b>Flowrate (dscfm)</b>	1,161	12,685	1,153	12,558	1,147	12,641	1,154	12,628
<b>Oxides of Nitrogen</b>								
MW = 46								
NOx, ppm		11.6		11.6		11.2		11.5
NOx, lb/hr		1.1		1.0		1.0		1.0
NOx, lb/MMBtu		0.031		0.031		0.030		0.031
<b>Carbon Monoxide</b>								
MW = 28								
CO, ppm		18.2		24.8		22.0		21.7
CO, lb/hr		1.0		1.4		1.2		1.2
CO, lb/MMBtu		0.030		0.040		0.036		0.035
<b>Hydrocarbons as methane</b>								
MW = 16								
THC, ppm	486,764	< 1	491,140	< 1	497,586	< 1	491,830	< 1
THC, lb/hr	1,403	0.03	1,406	0.03	1,417	0.03	1,408	0.03
Methane, ppm	485,360	NM	489,360	NM	495,520	NM	490,080	NM
Methane, lb/hr	1,399	NM	1,401	NM	1,410.9	NM	1,403	NM
NMOC, ppm	1404	< 1	1780	< 1	2066	< 1	1,750	< 1
NMOC, ppm corrected to 3% O2		< 2		< 2		< 2		< 2
NMOC, lb/hr	4.0	0.031	5.1	0.031	5.9	0.031	5.0	0.031
<b>SO<sub>2</sub> as H<sub>2</sub>S, ppm</b>		3.77		3.78		4.28		3.94
<b>Efficiency %</b>								
THC		100.0%		100.0%		100.0%		100.0%
NMOC		99.2%		99.4%		99.5%		99.4%
<b>Calculations</b>								
lb/hr = ppm x MW x Qs x 8.223x10 <sup>-5</sup> / (Tstd + 460)								
ppm corrected @ O2 = ppm measured x [(20.9 - O2% correction) / (20.9% O2 - O2 measured)]								
lb/MMBtu = F-factor x MW x [1.3711x10 <sup>-6</sup> / (Tstd + 460)] x [(20.9 / 20.9 - O2%) x ppm]								
Efficiency (%) = in (lb/hr)-out (lb/hr)/in (lb/hr) x 100								

NM = not measured

## Stack Gas Flow Rate ---- Fuel Usage

EPA Method 19

Facility Kirby  
Source Flare  
Date 1/6/2005

Gross Caloric Value (Btu/ft3) Btu/ft3  
Stack Oxygen %  
Fuel factor @ 70 F DSCF/MMBtu

	Run 1	Run 2	Run 3	Average
	482.2	486.2	492.3	486.9
	12.1	12.0	12.0	12.0
	9,541.2	9,539.9	9,533.8	9,538.3

Corrected Fuel Rate (SCFM) @ Tstd SCFM  
Fuel Flowrate (SCFH) @ Tstd SCFH  
Million Btu per minute MMBtu/min  
Heat Input (MMBtu/hr) MMBtu/hr  
Heat Input (MMBtu/day) MMBtu/day

1,161	1,153	1,147	1,154
69,660	69,180	68,820	69,220
0.560	0.561	0.565	0.562
33.6	33.6	33.9	33.7
806.1	807.2	813.1	808.8

Stack Gas Flow Rate (dscfm) dscfm

12,685	12,558	12,641	12,628
--------	--------	--------	--------

### Calculations

$$\text{SCFM} = \text{CFM} * (\text{Tstd} + 460) * \text{gas PSIA} / 14.7 / (\text{gas F} + 460)$$

$$\text{SCFH} = \text{SCFM} * 60$$

$$\text{MMBtu/min} = \text{SCFM} * \text{Btu/ft3} / 1,000,000$$

$$\text{MMBtu/hr} = \text{MMBtu/min} * 60$$

$$\text{DSCFM} = \text{Fuel factor} * \text{MMBtu/min} * (20.9 / (20.9 - \text{O2\%})) * (\text{Tstd} + 460) / 528$$

### Notes

Corrected Fuel Rate (SCFM) @ Tstd data is from the system data aquistion

**Kirby Landfill**  
**Flare Source Test-2005**  
**Calculations of SO<sub>2</sub> Emission**

Parameters	Run 1	Run 2	Run 3	Average	Units
Fuel Input	1161	1153	1147	1153.7	scfm
Sulfur (as H <sub>2</sub> S)	41	41	47	43.0	ppmv
R	0.7302	0.7302	0.7302	0.7302	atm*ft <sup>3</sup> /lbmol*R
Fuel Input	3.0113	2.9906	2.9750	2.9923	lbmol/min
Sulfur Input	0.000123	0.000123	0.00014	0.00013	lbmol/min
Sulfur Outlet	0.000123	0.000123	0.00014	0.00013	lbmol/min
SO <sub>2</sub> MW	64.06	64.06	64.06	64.06	lb/lbmol
SO <sub>2</sub> Outlet	0.007909	0.007855	0.008957	0.00824	lb/min
SO <sub>2</sub> Outlet	0.474546	0.471276	0.537432	0.4944	lb/hr
Exhaust Flow rate (dscfm)	12,685	12,558	12,641	12,628	dscfm
SO <sub>2</sub> Outlet	3.77	3.78	4.28	3.94	ppmv

***Appendix D***  
***Process Data***

**Kirby Canyon 2005 Source Test Summary Process**  
Data, Test Date : 1-6-05

Run	Time	Flare Temp degree F	LFG Flow SCFM
1	0949-1019	1496 <sup>a</sup>	1161 <sup>a</sup>
2	1038-1108	1497 <sup>a</sup>	1153 <sup>a</sup>
3	1127-1201	1497 <sup>a</sup>	1147 <sup>a</sup>

*Note: <sup>a</sup> Average of minimum and maximum readings  
for the test duration.*

DAQSTANDARD R2.06  
 Data Viewer R2.06  
 I T Corporation Rebecca Zito 110-24547-4866

Device Type DX100  
 Serial No. 12C716532  
 File Message  
 Time Correction None  
 Starting Condition Auto  
 Dividing Condition Auto  
 Meas Ch. 6  
 Math Ch. 1  
 Data Count 4453  
 Sampling Interval 120.000 sec  
 Start Time 2005/01/01 00:50:00 0.000  
 Stop Time 2005/01/07 05:14:00 0.000  
 Trigger Time 2005/01/01 08:48:00 0.000  
 Trigger No. 239  
 Damage Check Not Damaged

Converted Group 1 - 1

Ch.	CH01	CH02
Tag	FLARE TEMP	LFG FLOW
Unit	F	SCFM

**Run 1: 0949-1019**

Date	Time	sec	MIN	MAX	MIN	MAX
2005/01/06	09:48:00	0.000	1488	1498	1143	1161
2005/01/06	09:50:00	0.000	1493	1501	1161	1172
2005/01/06	09:52:00	0.000	1494	1501	1160	1172
2005/01/06	09:54:00	0.000	1493	1496	1165	1174
2005/01/06	09:56:00	0.000	1491	1498	1160	1170
2005/01/06	09:58:00	0.000	1493	1494	1152	1167
2005/01/06	10:00:00	0.000	1489	1498	1148	1165
2005/01/06	10:02:00	0.000	1493	1501	1149	1165
2005/01/06	10:04:00	0.000	1491	1500	1160	1169
2005/01/06	10:06:00	0.000	1494	1500	1160	1171
2005/01/06	10:08:00	0.000	1491	1494	1149	1170
2005/01/06	10:10:00	0.000	1493	1502	1152	1167
2005/01/06	10:12:00	0.000	1494	1503	1161	1167
2005/01/06	10:14:00	0.000	1491	1498	1152	1166
2005/01/06	10:16:00	0.000	1491	1495	1146	1157
2005/01/06	10:18:00	0.000	1494	1501	1149	1165
2005/01/06	10:20:00	0.000	1489	1501	1144	1162

**Average** 1492 1499 1154 1167

**Run 2: 1038-1108**

2005/01/06	10:38:00	0.000	1489	1501	1150	1162
2005/01/06	10:40:00	0.000	1492	1501	1156	1163
2005/01/06	10:42:00	0.000	1491	1501	1153	1160
2005/01/06	10:44:00	0.000	1494	1501	1151	1161
2005/01/06	10:46:00	0.000	1491	1498	1137	1156
2005/01/06	10:48:00	0.000	1493	1499	1138	1157
2005/01/06	10:50:00	0.000	1491	1505	1142	1170
2005/01/06	10:52:00	0.000	1489	1504	1154	1161
2005/01/06	10:54:00	0.000	1489	1501	1151	1161
2005/01/06	10:56:00	0.000	1492	1503	1154	1165
2005/01/06	10:58:00	0.000	1491	1498	1151	1160
2005/01/06	11:00:00	0.000	1493	1501	1148	1158
2005/01/06	11:02:00	0.000	1491	1496	1142	1156
2005/01/06	11:04:00	0.000	1493	1496	1135	1149
2005/01/06	11:06:00	0.000	1493	1503	1137	1153
2005/01/06	11:08:00	0.000	1494	1500	1134	1149

**Average** 1492 1501 1146 1159

**Run 3: 1127-1201**

<b>Date</b>	<b>Time</b>	<b>Ch. Tag Unit sec</b>	<b>CH01</b>		<b>CH02</b>	
			<b>FLARE TEMP F</b>	<b>MIN</b>	<b>MAX</b>	<b>LFG FLOW SCFM</b>
2005/01/06	11:26:00	0.000	1491	1501	1128	1145
2005/01/06	11:28:00	0.000	1493	1501	1139	1153
2005/01/06	11:30:00	0.000	1493	1501	1146	1156
2005/01/06	11:32:00	0.000	1493	1500	1146	1156
2005/01/06	11:34:00	0.000	1493	1500	1136	1153
2005/01/06	11:36:00	0.000	1490	1500	1134	1149
2005/01/06	11:38:00	0.000	1494	1504	1139	1156
2005/01/06	11:40:00	0.000	1493	1503	1143	1155
2005/01/06	11:42:00	0.000	1497	1501	1140	1150
2005/01/06	11:44:00	0.000	1493	1501	1146	1157
2005/01/06	11:46:00	0.000	1492	1495	1134	1154
2005/01/06	11:48:00	0.000	1491	1503	1139	1150
2005/01/06	11:50:00	0.000	1496	1500	1144	1154
2005/01/06	11:52:00	0.000	1494	1500	1135	1155
2005/01/06	11:54:00	0.000	1496	1501	1140	1156
2005/01/06	11:56:00	0.000	1491	1501	1152	1158
2005/01/06	11:58:00	0.000	1491	1498	1138	1155
2005/01/06	12:00:00	0.000	1493	1498	1138	1151
2005/01/06	12:02:00	0.000	1498	1503	1139	1155
<b>Average</b>			<b>1493</b>	<b>1501</b>	<b>1140</b>	<b>1154</b>

## Landfill Process Data Sheet

Landfill: Kirby

Test date: 1-6-05

Source: Flare IC Engine, Turbine  
 circle one

Landfill Gas Data	Run 1	Run 2	Run 3		
Time	0949	1019	1038	1105	1127
Methane (%)	49.6	-	-	-	50.3
O2 (%)	0.7	-	-	-	0.7
Landfill Gas Rate (scfm)	1164	1157	1156	1145	1140
Flare Temp (F)	1497	1498	1497	1498	1498

Thermocouple Location: Top

f-factor  $\approx$  50% methane = 9450

***Appendix E***  
***Continuous Emission Monitoring Data***

***Data Acquisition***  
***Strip Chart Records***  
***Calibration Gas Certificates of Analysis***  
***EPA Method 205 Field Test Results***  
***NO<sub>x</sub> Converter Check***

Run averages corrected for bias

Operator: B Johnston

Plant Name: Kirby

Location: Flare

Date 1/6/2005

Run	O2 %	CO ppm	THC ppm	NOx ppm
1	12.1	18.2	0.3	11.6
2	12.0	24.8	0.5	11.6
3	12.0	22.0	0.0	11.2

STRATA Configuration Page 1  
 01-05-2005 12:55:20  
 File Name: C:\STRATA\GUADLPE.STR

Operator: B Johnston  
 Plant Name: Kirby  
 Location: Flare  
 Run Length: 30 minutes  
 Sample Rate: 40 per minute  
 Average Calibration Results: 1 minutes  
 Automatic Sequence, Calibration Error: No  
 Automatic Sequence, System Bias: No  
 Max Response Time: Manual  
 Max Response Time: 1 minutes  
 Traverse During Run: No

Active	Chan.	Analyte	Span	Span	Offset	
		Name	Units	Units	Volts	Volts
Yes	1	O2	%	25	1	0
Yes	3	CO	ppm	500	1	0
Yes	4	THC	ppm	50	10	0
Yes	5	NOx	ppm	50	10	0

Measurement System Preparation Table

Gas	Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Cylinder Numbers																
Name		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
O2	Z	H	M														
CO	Z			H	M												
THC	Z					H	M	L									
NOx	Z						H	M									

CEM leak check 0.1" for 1 min  $\approx$  15" var.

R1 0949-1019

R2 1038-1108

R3 1127-1201

power went off Stratco paused  
 during down time ~ 3 min

STRATA Configuration Page 2

Gas Name	Zero Reference Cylinder			Low Reference Cylinder		
	No.	Conc	ID Number	No.	Conc	ID Number
O2	1	0		99	999	
CO	1	0		99	999	
THC	1	0		8	15	Environics
NOx	1	0		99	999	

Gas Name	Mid No.	Reference Conc	Cylinder ID Number	High No.	Reference Conc	Cylinder ID Number
O2	3	7.98	SA10693	2	18.96	CC140645
CO	5	200	Environics	4	450	Environics
THC	7	30	Environics	6	45	Environics
NOx	10	20	Environics	9	40.3	SA15339

Seq Num	O2	CO	THC	NOx	Environmental Gas
1	Zero	Zero	Zero	Zero	- 842 Methane
2	High			High	CC 92594
3	Mid			Mid	
4		High			- 819 NOx
5		Mid			ST 8532
6			High		
7			Mid		
8					- CO 858ppm
9					
10					CC 181169
11					
12					
13					
14					
15					

STRATA Configuration Page 3

Seq	System	Bias	Check	Sequence
Num	O2	CO	THC	NOx
1	Zero	Zero	Zero	Zero
2	Mid			
3				High
4		Mid		
5		Mid		
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				

Seq	System	Bias	Valve	Sequence												
Num	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
1	X															
2		X														
3			X													
4				X												
5					X											
6						X										
7							X									
8								X								
9									X							
10										X						
11											X					
12												X				
13													X			
14														X		
15															X	

STRATA Configuration End

Calibration Error Test, Run 1		STRATA Version 1.1			
		O2	CO	THC	NOx
		%	ppm	ppm	ppm
01-06-2005	08:12:40	0.031	-0.18	-0.076	0.127
01-06-2005	08:13:40	2.237	0.04	-0.076	12.406
01-06-2005	08:14:39	17.782	0.01	-0.076	39.847
01-06-2005	08:15:40	18.947	-0.20	-0.076	40.434
01-06-2005	08:16:39	17.816	-0.23	-0.076	32.927
01-06-2005	08:17:40	8.805	0.17	-0.076	19.057
01-06-2005	08:18:40	8.095	0.17	-0.075	19.278
01-06-2005	08:19:41	8.067	0.16	-0.075	19.439
01-06-2005	08:20:40	8.057	0.09	-0.075	19.587
01-06-2005	08:21:40	2.748	144.39	-0.075	1.783
01-06-2005	08:22:41	0.106	384.31	-0.075	0.135
01-06-2005	08:23:40	0.043	400.72	-0.075	0.125
01-06-2005	08:24:41	0.032	406.45	-0.075	0.125
01-06-2005	08:25:40	0.026	451.47	-0.075	0.125
01-06-2005	08:26:39	0.026	451.01	-0.075	0.125
01-06-2005	08:27:40	0.023	451.41	-0.075	0.125
01-06-2005	08:28:39	0.026	449.25	-0.075	0.125
01-06-2005	08:29:40	0.026	199.69	-0.074	0.129
01-06-2005	08:30:40	0.024	203.78	-0.074	0.125
01-06-2005	08:31:41	0.019	161.03	0.156	0.127
01-06-2005	08:32:40	0.020	0.34	34.779	0.135
01-06-2005	08:33:40	0.023	0.26	41.476	0.127
01-06-2005	08:34:40	0.022	0.20	46.158	0.128
01-06-2005	08:35:41	0.025	0.11	45.281	0.136
01-06-2005	08:36:40	0.021	0.07	45.170	0.138
01-06-2005	08:37:41	0.021	-0.03	45.213	0.143
01-06-2005	08:38:40	0.020	-0.07	41.590	0.130
01-06-2005	08:39:39	0.020	-0.08	30.155	0.135

Calibration Error Test, Run 1 STRATA Version 1.1

Operator: B Johnston

Plant Name: Kirby

Location: Flare

	Reference Cylinder Numbers	Zero	Low-range	Mid-range	High-range
O2				SA10693	CC140645
CO				Environics	Environics
THC			Environics	Environics	Environics
NOx				Environics	SA15339

Date/Time 01-06-2005 08:40:05 PASSED

Analyte O2 CO THC NOx

Units % ppm ppm ppm

Zero Ref Cyl 0.000 0.00 0.000 0.000

Zero Avg 0.028 -0.13 -0.076 0.131

Zero Error% 0.1% 0.0% 0.2% 0.3%

Low Ref Cyl

Low Avg

Low Error%

Mid Ref Cyl 7.980 200.00 30.000 20.000

Mid Avg 8.058 203.53 30.123 19.562

Mid Error% 0.3% 0.7% 0.2% 0.9%

High Ref Cyl 18.960 450.00 45.000 40.300

High Avg 18.982 451.60 45.236 40.395

High Error% 0.1% 0.3% 0.5% 0.2%

Calibration Error Test End

Initial System Bias Check, Run 1 STRATA Version 1.1

		O2	CO	THC	NOx
		%	ppm	ppm	ppm
01-06-2005	08:41:09	0.020	-0.24	18.355	0.151
01-06-2005	08:42:08	0.022	-0.24	14.715	0.154
01-06-2005	08:43:09	0.021	-0.08	7.188	0.154
01-06-2005	08:44:09	0.027	-0.13	-0.072	0.153
01-06-2005	08:45:08	2.774	-0.20	-0.072	0.152
01-06-2005	08:46:08	7.806	-0.02	-0.072	0.129
01-06-2005	08:47:09	7.978	0.52	-0.072	0.137
01-06-2005	08:48:08	5.506	0.54	-0.072	23.884
01-06-2005	08:49:09	0.259	0.53	-0.072	40.343
01-06-2005	08:50:08	0.051	0.56	-0.071	40.250
01-06-2005	08:51:09	0.036	0.56	-0.071	40.049
01-06-2005	08:52:08	0.035	0.56	-0.071	40.168
01-06-2005	08:53:09	0.030	1.05	18.458	20.701
01-06-2005	08:54:08	0.028	0.57	30.246	0.138
01-06-2005	08:55:09	0.027	0.60	30.269	0.130
01-06-2005	08:56:09	0.024	29.49	15.638	0.129
01-06-2005	08:57:08	0.030	197.76	-0.070	0.129
01-06-2005	08:58:08	0.026	201.03	-0.071	0.129

Initial System Bias Check for Run 1

Operator: B Johnston

Plant Name: Kirby

Location: Flare

Reference Cylinder Numbers

	Zero	Span
O2		SA10693
CO		Environics
THC		Environics
NOx		SA15339

Date/Time	01-06-2005			08:58:32	PASSED
Analyte	O2	CO	THC	NOx	
Units	%	ppm	ppm	ppm	
Zero Ref Cyl	0.000	0.00	0.000	0.000	
Zero Cal	0.028	-0.13	-0.076	0.131	
Zero Avg	0.025	-0.15	-0.072	0.160	
Zero Bias%	0.0%	0.0%	0.0%	0.1%	
Zero Drift%					
Span Ref Cyl	7.980	200.00	30.000	40.300	
Span Cal	8.058	203.53	30.123	40.395	
Span Avg	7.980	201.32	30.274	40.177	
Span Bias%	0.3%	0.4%	0.3%	0.4%	
Span Drift%					
System Bias Check End					

## Test Run 1 STRATA Version 1.1

	O2	CO	THC	NOx
	%	ppm	ppm	ppm
Begin calculating run averages				
01-06-2005 09:49:56	12.275	15.21	-0.012	11.537
01-06-2005 09:50:57	12.219	7.32	-0.069	11.654
01-06-2005 09:51:57	12.145	7.96	-0.069	11.630
01-06-2005 09:52:56	12.240	11.10	-0.069	11.579
01-06-2005 09:53:57	12.186	15.75	0.373	11.671
01-06-2005 09:54:58	12.163	11.84	-0.063	11.630
01-06-2005 09:55:57	12.202	38.65	1.073	11.514
01-06-2005 09:56:57	12.138	17.48	0.247	11.604
01-06-2005 09:57:56	12.087	20.51	0.814	11.811
01-06-2005 09:58:57	12.147	23.80	0.333	11.595
01-06-2005 09:59:57	12.099	13.51	-0.013	11.741
01-06-2005 10:00:56	12.056	16.22	0.017	11.721
01-06-2005 10:01:57	12.063	16.37	0.138	11.751
01-06-2005 10:02:58	12.071	26.85	0.126	11.708
01-06-2005 10:03:57	12.084	5.40	-0.070	11.767
01-06-2005 10:04:57	12.150	23.64	1.199	11.597
01-06-2005 10:05:56	12.068	18.00	0.087	11.733
01-06-2005 10:06:57	12.048	12.64	0.029	11.656
01-06-2005 10:07:57	12.121	16.96	0.035	11.547
01-06-2005 10:08:56	12.035	7.27	-0.070	11.555
01-06-2005 10:09:57	12.066	8.33	-0.070	11.497
01-06-2005 10:10:58	11.997	33.10	0.818	11.635
01-06-2005 10:11:57	11.899	31.74	0.575	11.738
01-06-2005 10:12:57	11.851	20.90	0.178	11.907
01-06-2005 10:13:56	11.972	25.69	0.789	11.476
01-06-2005 10:14:57	11.952	13.71	-0.067	11.715
01-06-2005 10:15:57	12.089	23.06	0.150	11.514
01-06-2005 10:16:56	12.129	31.56	0.121	11.436
01-06-2005 10:17:57	12.052	38.05	0.961	11.476
01-06-2005 10:18:57	12.061	16.96	-0.024	11.743
Run Averages	O2	CO	THC	NOx
	%	ppm	ppm	ppm
01-06-2005 10:19:04	12.088	18.97	0.248	11.638
Operator:	B Johnston			
Plant Name:	Kirby			
Location:	Flare			
Test Run 1 End				

## Final System Bias Check, Run 1 STRATA Version 1.1

	O2	CO	THC	NOx
	%	ppm	ppm	ppm
01-06-2005 10:20:07	4.402	9.88	0.017	0.998
01-06-2005 10:21:06	0.147	2.63	-0.072	0.121
01-06-2005 10:22:07	0.053	2.15	-0.072	0.125
01-06-2005 10:23:06	0.037	1.80	-0.072	0.122
01-06-2005 10:24:07	0.502	1.53	-0.072	0.114
01-06-2005 10:25:06	7.254	1.32	-0.072	0.082
01-06-2005 10:26:05	7.992	1.14	-0.072	0.085
01-06-2005 10:27:06	8.024	1.05	-0.073	0.088
01-06-2005 10:28:07	4.888	0.87	-0.073	29.952
01-06-2005 10:29:06	0.214	0.80	-0.073	40.001
01-06-2005 10:30:07	0.064	0.68	-0.073	39.928
01-06-2005 10:31:06	0.042	0.66	3.124	33.256
01-06-2005 10:32:07	0.031	0.59	28.884	0.121
01-06-2005 10:33:06	0.029	0.55	29.917	0.082
01-06-2005 10:34:07	0.025	0.47	21.968	0.087
01-06-2005 10:35:06	0.024	109.64	-0.074	0.097
01-06-2005 10:36:07	0.020	200.85	-0.074	0.093

Final System Bias Check, Run 1 STRATA Version 1.1  
 Operator: B Johnston  
 Plant Name: Kirby  
 Location: Flare

	Reference Cylinder Numbers	
	Zero	Span
O2		SA10693
CO		Environics
THC		Environics
NOx		SA15339

Date/Time	01-06-2005		10:36:47	PASSED
Analyte	O2	CO	THC	NOx
Units	%	ppm	ppm	ppm
Zero Ref Cyl	0.000	0.00	0.000	0.000
Zero Cal	0.028	-0.13	-0.076	0.131
Zero Avg	0.035	1.67	-0.072	0.124
Zero Bias%	0.0%	0.4%	0.0%	0.0%
Zero Drift%	0.0%	0.4%	0.0%	-0.1%
Span Ref Cyl	7.980	200.00	30.000	40.300
Span Cal	8.058	203.53	30.123	40.395
Span Avg	8.022	201.32	29.934	39.884
Span Bias%	0.1%	0.4%	0.4%	1.0%
Span Drift%	0.2%	0.0%	-0.7%	-0.6%
Ini Zero Avg	0.025	-0.15	-0.072	0.160
Ini Span Avg	7.980	201.32	30.274	40.177
Run Avg	12.088	18.97	0.248	11.638
Co	0.030	0.76	-0.072	0.142
Cm	8.001	201.32	30.104	40.030
Correct Avg	12.072	18.15	0.319	11.614
System Bias Check End				

## Test Run 2 STRATA Version 1.1

	O2	CO	THC	NOx
	%	ppm	ppm	ppm
Begin calculating run averages				
01-06-2005 10:39:08	11.908	17.02	0.031	11.827
01-06-2005 10:40:07	12.007	37.70	0.941	11.502
01-06-2005 10:41:07	12.025	21.83	-0.036	11.509
01-06-2005 10:42:08	12.108	26.96	0.067	11.505
01-06-2005 10:43:07	12.029	26.77	1.006	11.629
01-06-2005 10:44:08	12.147	39.72	1.223	11.399
01-06-2005 10:45:07	12.077	28.24	0.541	11.635
01-06-2005 10:46:07	12.073	34.57	2.587	11.576
01-06-2005 10:47:08	11.971	23.20	0.493	11.756
01-06-2005 10:48:07	12.052	31.36	0.247	11.435
01-06-2005 10:49:07	12.030	14.69	0.285	11.500
01-06-2005 10:50:08	12.025	27.04	0.182	11.484
01-06-2005 10:51:07	11.934	13.18	0.217	11.786
01-06-2005 10:52:08	12.171	39.54	0.421	11.111
01-06-2005 10:53:07	12.063	23.32	0.088	11.507
01-06-2005 10:54:07	12.050	9.54	0.080	11.380
01-06-2005 10:55:08	12.103	30.83	0.457	11.515
01-06-2005 10:56:07	12.022	34.88	0.369	11.412
01-06-2005 10:57:08	12.040	25.55	0.058	11.669
01-06-2005 10:58:07	12.072	29.51	0.133	11.340
01-06-2005 10:59:07	12.096	23.49	0.280	11.437
01-06-2005 11:00:08	12.144	24.14	0.067	11.240
01-06-2005 11:01:07	12.075	20.99	0.100	11.414
01-06-2005 11:02:07	12.008	18.26	-0.005	11.529
01-06-2005 11:03:08	11.998	24.00	0.944	11.629
01-06-2005 11:04:07	12.058	51.92	1.777	11.451
01-06-2005 11:05:08	11.993	14.16	-0.061	11.479
01-06-2005 11:06:07	12.052	11.58	-0.077	11.535
01-06-2005 11:07:07	12.059	30.07	0.330	11.296
01-06-2005 11:08:08	12.143	41.86	1.473	11.187
Run Averages	O2	CO	THC	NOx
	%	ppm	ppm	ppm
01-06-2005 11:08:14	12.052	26.49	0.473	11.487

Operator: B Johnston

Plant Name: Kirby

Location: Flare

Test Run 2 End

## Final System Bias Check, Run 2 STRATA Version 1.1

	O2	CO	THC	NOx
	%	ppm	ppm	ppm
01-06-2005 11:09:17	4.500	5.62	-0.078	0.950
01-06-2005 11:10:18	0.123	2.75	-0.078	0.068
01-06-2005 11:11:17	0.025	2.18	-0.078	0.058
01-06-2005 11:12:16	1.001	1.70	-0.078	0.053
01-06-2005 11:13:17	7.484	1.23	-0.078	0.033
01-06-2005 11:14:16	7.968	1.12	-0.078	0.032
01-06-2005 11:15:17	7.393	0.94	-0.078	10.719
01-06-2005 11:16:16	0.705	0.78	-0.078	39.809
01-06-2005 11:17:17	0.037	0.64	-0.078	39.712
01-06-2005 11:18:16	0.009	0.50	-0.079	37.583
01-06-2005 11:19:17	-0.007	0.42	27.153	0.051
01-06-2005 11:20:17	-0.013	0.40	30.188	0.064
01-06-2005 11:21:17	-0.011	0.34	30.237	0.061
01-06-2005 11:22:18	-0.013	77.61	2.613	0.058
01-06-2005 11:23:17	-0.017	198.29	0.407	0.048
01-06-2005 11:24:16	-0.016	199.88	-0.071	0.042

Final System Bias Check, Run 2 STRATA Version 1.1  
 Operator: B Johnston  
 Plant Name: Kirby  
 Location: Flare

	Reference Cylinder Numbers	
	Zero	Span
O2		SA10693
CO		Environics
THC		Environics
NOx		SA15339

Date/Time	11:24:18			PASSED
Analyte	O2	CO	THC	NOx
Units	%	ppm	ppm	ppm
Zero Ref Cyl	0.000	0.00	0.000	0.000
Zero Cal	0.028	-0.13	-0.076	0.131
Zero Avg	0.016	1.95	-0.078	0.056
Zero Bias%	0.0%	0.4%	0.0%	0.1%
Zero Drift%	-0.1%	0.1%	0.0%	-0.1%
Span Ref Cyl	7.980	200.00	30.000	40.300
Span Cal	8.058	203.53	30.123	40.395
Span Avg	7.986	199.83	30.228	39.772
Span Bias%	0.3%	0.7%	0.2%	1.2%
Span Drift%	-0.1%	-0.3%	0.6%	-0.2%
Ini Zero Avg	0.035	1.67	-0.072	0.124
Ini Span Avg	8.022	201.32	29.934	39.884
Run Avg	12.052	26.49	0.473	11.487
Co	0.025	1.81	-0.075	0.090
Cm	8.004	200.58	30.081	39.828
Correct Avg	12.029	24.83	0.545	11.559
System Bias Check End				

## Test Run 3 STRATA Version 1.1

	O2 %	CO ppm	THC ppm	NOx ppm
Begin calculating run averages				
01-06-2005 11:28:17	12.049	28.24	0.222	11.141
01-06-2005 11:29:17	12.043	15.98	-0.016	11.363
Pause				
01-06-2005 11:30:16	6.738	8.67	1.121	7.035
01-06-2005 11:31:17	9.527	-3.20	5.499	3.148
01-06-2005 11:32:17	11.963	47.79	0.603	0.586
End Pause				
01-06-2005 11:33:16	11.866	16.57	-0.035	10.690
01-06-2005 11:34:17	12.062	46.31	1.729	11.208
01-06-2005 11:35:18	12.039	46.21	1.701	11.161
01-06-2005 11:36:17	11.976	17.74	-0.007	11.330
01-06-2005 11:37:17	12.051	9.66	-0.088	11.257
01-06-2005 11:38:16	12.011	8.99	-0.100	11.160
01-06-2005 11:39:17	12.247	50.95	1.628	10.795
01-06-2005 11:40:17	12.090	15.86	-0.092	11.131
01-06-2005 11:41:16	12.176	16.67	-0.017	10.982
01-06-2005 11:42:17	12.134	31.23	0.336	11.038
01-06-2005 11:43:18	12.173	47.01	1.236	10.891
01-06-2005 11:44:17	12.088	19.46	0.175	11.262
01-06-2005 11:45:17	12.054	21.40	0.116	11.162
01-06-2005 11:46:16	12.164	26.37	0.194	11.002
01-06-2005 11:47:17	11.973	16.73	-0.016	11.420
01-06-2005 11:48:17	12.004	20.78	0.243	11.247
01-06-2005 11:49:16	12.050	21.13	0.193	11.219
01-06-2005 11:50:17	11.965	16.81	0.026	11.174
01-06-2005 11:51:18	12.188	9.29	-0.089	10.904
01-06-2005 11:52:17	12.267	26.14	-0.062	10.640
01-06-2005 11:53:17	12.109	18.48	0.257	11.119
01-06-2005 11:54:16	12.062	12.96	-0.036	11.082
01-06-2005 11:55:17	12.221	23.15	0.278	10.783
01-06-2005 11:56:18	12.200	15.70	0.121	10.957
01-06-2005 11:57:17	12.156	23.83	0.141	11.030
01-06-2005 11:58:17	12.172	37.44	0.511	10.948
01-06-2005 11:59:16	11.991	37.49	1.198	11.368
01-06-2005 12:00:17	11.956	15.81	-0.048	11.313
Run Averages	O2 %	CO ppm	THC ppm	NOx ppm
01-06-2005 12:00:42	12.023	23.63	0.361	11.071
Operator:	B Johnston			
Plant Name:	Kirby			
Location:	Flare			
Test Run 3 End				

## Final System Bias Check, Run 3      STRATA Version 1.1

	O2	CO	THC	NOx
	%	ppm	ppm	ppm
01-06-2005 12:01:49	4.149	5.81	-0.082	0.921
01-06-2005 12:02:48	0.096	2.61	-0.059	0.003
01-06-2005 12:03:48	-0.006	2.04	0.786	0.002
01-06-2005 12:04:48	-0.015	1.78	0.775	-0.001
01-06-2005 12:05:49	5.928	1.28	-0.082	-0.001
01-06-2005 12:06:48	7.899	1.16	-0.082	-0.001
01-06-2005 12:07:49	7.946	1.00	-0.083	-0.001
01-06-2005 12:08:48	2.846	0.80	-0.082	37.356
01-06-2005 12:09:49	0.070	0.65	-0.067	39.582
01-06-2005 12:10:48	0.003	0.55	0.062	39.510
01-06-2005 12:11:49	-0.005	0.48	-0.079	39.480
01-06-2005 12:12:48	1.417	0.45	15.580	20.829
01-06-2005 12:13:48	0.177	0.41	30.889	0.001
01-06-2005 12:14:48	-0.018	0.18	30.808	-0.001
01-06-2005 12:15:49	-0.027	0.10	30.812	-0.001
01-06-2005 12:16:49	-0.031	65.73	4.209	-0.001
01-06-2005 12:17:48	-0.029	197.58	-0.082	-0.001
01-06-2005 12:18:49	-0.031	199.57	-0.082	-0.001

Final System Bias Check, Run 3 STRATA Version 1.1  
 Operator: B Johnston  
 Plant Name: Kirby  
 Location: Flare

	Reference Cylinder Numbers	
	Zero	Span
O2		SA10693
CO		Environics
THC		Environics
NOx		SA15339

Date/Time	01-06-2005	12:18:55	PASSED	
Analyte	O2	CO	THC	NOx
Units	%	ppm	ppm	ppm
Zero Ref Cyl	0.000	0.00	0.000	0.000
Zero Cal	0.028	-0.13	-0.076	0.131
Zero Avg	-0.014	1.84	0.806	0.001
Zero Bias%	0.2%	0.4%	1.8%	0.3%
Zero Drift%	-0.1%	0.0%	1.8%	-0.1%
Span Ref Cyl	7.980	200.00	30.000	40.300
Span Cal	8.058	203.53	30.123	40.395
Span Avg	7.945	199.56	30.812	39.467
Span Bias%	0.5%	0.8%	1.4%	1.9%
Span Drift%	-0.2%	-0.1%	1.2%	-0.6%
Ini Zero Avg	0.016	1.95	-0.078	0.056
Ini Span Avg	7.986	199.83	30.228	39.772
Run Avg	12.023	23.63	0.361	11.071
Co	0.001	1.90	0.364	0.028
Cm	7.965	199.69	30.520	39.619
Correct Avg	12.046	21.97	-0.003	11.241
System Bias Check End				

Stop 1019

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Stop 1008

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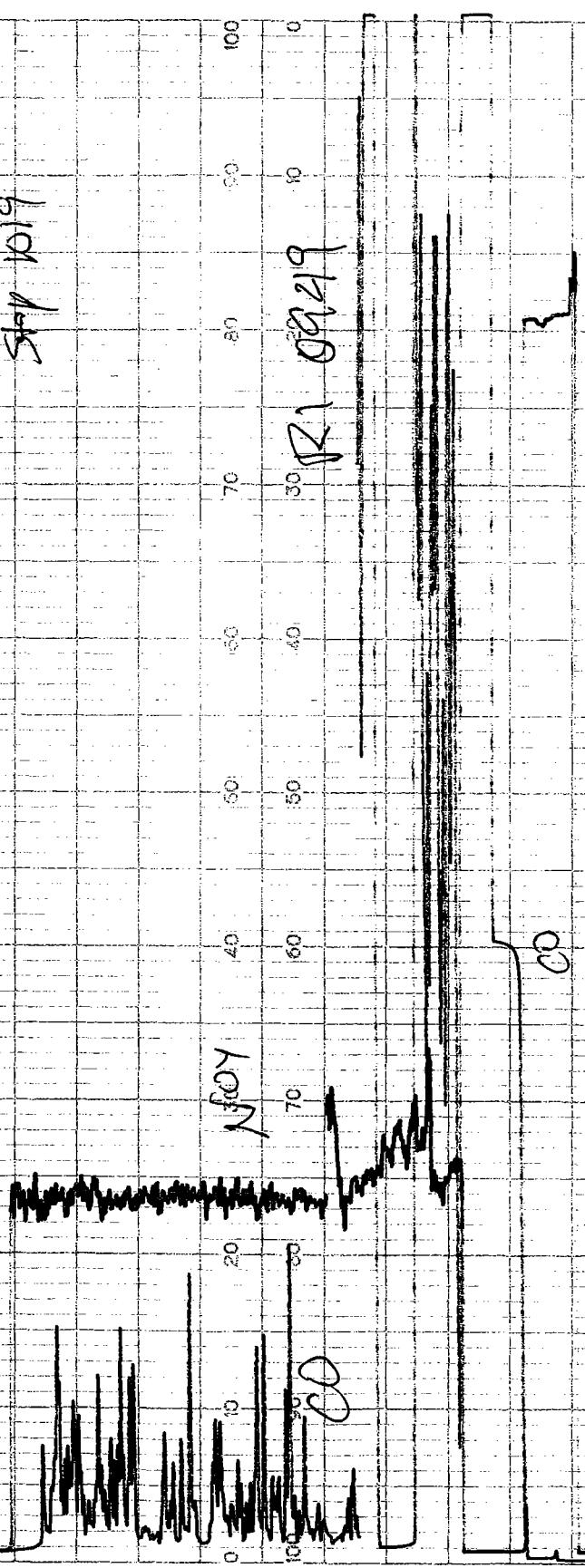
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Cal Turner

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CS 6 - ESDR 11/18/14

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Page 2

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Step 1019

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O2

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O2

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Power off

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# CERTIFICATE OF ANALYSIS / EPA PROTOCOL GAS

CUSTOMER TIAX

P.O NUMBER

## REFERENCE STANDARD

COMPONENT	NIST SRM NO.	CYLINDER NO.	CONCENTRATION
CARBON DIOXIDE GMIS	vs.SRM#2745	8747556	17.99 %
OXYGEN GMIS	vs.SRM#2659	CC 92411	20.75 %

## ANALYZER READINGS

R=REFERENCE STANDARD

Z=ZERO GAS

C=GAS CANDIDATE

1. COMPONENT	CARBON DIOXIDE	GMIS	ANALYZER MAKE-MODEL-S/N	Siemens Ultramat 5E S/N A12-730
ANALYTICAL PRINCIPLE	NDIR		LAST CALIBRATION DATE	06/05/03
FIRST ANALYSIS DATE	07-01-03		SECOND ANALYSIS DATE	
Z 0	R 18.00	C 17.92	CONC. 17.91	Z R C CONC.
R 18.00	Z 0	C 17.92	CONC. 17.91	R Z C CONC.
Z 0	C 17.92	R 18.00	CONC. 17.91	Z C R CONC.
U/M %	MEAN TEST ASSAY		17.91	U/M % MEAN TEST ASSAY
2. COMPONENT	OXYGEN	GMIS	ANALYZER MAKE-MODEL-S/N	Siemens Oxymat 5E S/N A12-839
ANALYTICAL PRINCIPLE	Paramagnetic		LAST CALIBRATION DATE	06/05/03
FIRST ANALYSIS DATE	07-01-03		SECOND ANALYSIS DATE	
Z 0	R 20.75	C 18.96	CONC. 18.96	Z R C CONC.
R 20.75	Z 0	C 18.96	CONC. 18.96	R Z C CONC.
Z 0	C 18.96	R 20.75	CONC. 18.96	Z C R CONC.
U/M %	MEAN TEST ASSAY		18.96	U/M % MEAN TEST ASSAY

Values not valid below 150 psig

THIS CYLINDER NO.	CC 140645	CERTIFIED CONCENTRATION
HAS BEEN CERTIFIED ACCORDING TO SECTION		CARBON DIOXIDE 17.91 %
OF TRACEABILITY PROTOCOL NO.	Rev. 9/97	OXYGEN 18.96 %
PROCEDURE	G1	NITROGEN BALANCE
CERTIFIED ACCURACY	± 1 %	NIST TRACEABLE
CYLINDER PRESSURE	2000 PSIG	
CERTIFICATION DATE	07/01/03	
EXPIRATION DATE	07/01/06	TERM 36 MONTHS

ANALYZED BY

PHU TIEN NGUYEN

CERTIFIED BY

VICTOR DOTAN

## IMPORTANT

Information contained herein has been prepared at your request by qualified experts within Praxair Distribution, Inc. While we believe that the information is accurate within the limits of the analytical methods employed and is complete to the extent of the specific analyses performed, we make no warranty or representation as to the suitability of the use of the information for any particular purpose. The information is offered with the understanding that any use of the information is at the sole discretion and risk of the user. In no event shall the liability of Praxair Distribution, Inc., arising out of the use of the information contained herein exceed the fee established for providing such information.

Making Our Planet More Productive

## CERTIFICATE OF ANALYSIS / EPA PROTOCOL GAS

CUSTOMER TIAX LLC

P.O NUMBER

### REFERENCE STANDARD

## COMPONENT

## NIST SRM NO.

## CYLINDER NO.

## CONCENTRATION

CARBON DIOXIDE GMIS

vs.SRM#1675

CC 92886

10.08 %

OXYGEN GMIS

vs.SRM#2658

CC 72756

10.01 %

### ANALYZER READINGS

R=REFERENCE STANDARD

Z=ZERO GAS

C=GAS CANDIDATE

1. COMPONENT	CARBON DIOXIDE	GMIS	ANALYTICAL PRINCIPLE	NDIR	FIRST ANALYSIS DATE	11/12/03	ANALYZER MAKE-MODEL-S/N	Siemens Ultramat 5E S/N A12-730	LAST CALIBRATION DATE	11/03/03
								MEAN TEST ASSAY		
Z	0.00	R	10.08	C	10.00	CONC.	10.00	Z	R	C
R	10.08	Z	0.00	C	10.00	CONC.	10.00	R	Z	C
Z	0.00	C	10.00	R	10.08	CONC.	10.00	Z	C	R
U/M %						MEAN TEST ASSAY	10.00	U/M %		MEAN TEST ASSAY
2. COMPONENT	OXYGEN	GMIS	ANALYTICAL PRINCIPLE	Paramagnetic	FIRST ANALYSIS DATE	11/12/03	ANALYZER MAKE-MODEL-S/N	Siemens Oxymat 5E S/N A12-839	LAST CALIBRATION DATE	11/03/03
Z	0.00	R	10.01	C	7.98	CONC.	7.98	Z	R	C
R	10.01	Z	0.00	C	7.98	CONC.	7.98	R	Z	C
Z	0.00	C	7.98	R	10.01	CONC.	7.98	Z	C	R
U/M %						MEAN TEST ASSAY	7.98	U/M %		MEAN TEST ASSAY

Values not valid below 150 psig

THIS CYLINDER NO.	SA 10693	CERTIFIED CONCENTRATION
HAS BEEN CERTIFIED ACCORDING TO SECTION	EPA-600/R97/121	CARBON DIOXIDE 10.00 %
OF TRACEABILITY PROTOCOL NO.	Rev. 9/97	OXYGEN 7.98 %
PROCEDURE	G1	NITROGEN BALANCE
CERTIFIED ACCURACY	± 1 % NIST TRACEABLE	
CYLINDER PRESSURE	2000 PSIG	
CERTIFICATION DATE	11/12/03	
EXPIRATION DATE	11/12/06 TERM 36 MONTHS	

ANALYZED BY

PHU TAIEN NGUYEN

CERTIFIED BY

VICTOR DOTAN

## IMPORTANT

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Praxair  
5700 South Alameda Street  
Los Angeles, CA 90058  
Telephone: (323) 585-2154  
Facsimile: (714) 542-6689

## CERTIFICATE OF ANALYSIS / EPA PROTOCOL GAS

CUSTOMER TIAX CORP

P.O NUMBER

### REFERENCE STANDARD

COMPONENT	NIST SRM NO.	CYLINDER NO.	CONCENTRATION
METHANE	vs. SRM#275	164451	888 ppm

### ANALYZER READINGS

R=REFERENCE STANDARD

Z=ZERO GAS

C=GAS CANDIDATE

1. COMPONENT	METHANE	ANALYZER MAKE-MODEL-S/N	HORIBA, FIA-510, 851135122
ANALYTICAL PRINCIPLE	Flame Ionization Detector	LAST CALIBRATION DATE	01/01/04
FIRST ANALYSIS DATE	02/14/04	SECOND ANALYSIS DATE	
Z 0	R 888	C 842	CONC. 842
R 888	Z 0	C 841	CONC. 841
Z 0	C 842	R 888	CONC. 842
U/M ppm		MEAN TEST ASSAY	842
		U/M ppm	MEAN TEST ASSAY

Values not valid below 150 psig

THIS CYLINDER NO.	CC 92594	CERTIFIED CONCENTRATION
HAS BEEN CERTIFIED ACCORDING TO SECTION	EPA-600/R97/121	METHANE 842 ppm
OF TRACEABILITY PROTOCOL NO.	Rev. 9/97	AIR BALANCE
PROCEDURE	G1	
CERTIFIED ACCURACY	± 1 % NIST TRACEABLE	
CYLINDER PRESSURE	2000 PSIG	
CERTIFICATION DATE	02/14/04	
EXPIRATION DATE	02/14/07 TERM 36 MONTHS	

ANALYZED BY

PHU TIEN NGUYEN

CERTIFIED BY

VICTOR DOTAN

### IMPORTANT

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## CERTIFICATE OF ANALYSIS / EPA PROTOCOL GAS

CUSTOMER TIAX LLC

P.O. NUMBER

### REFERENCE STANDARD

COMPONENT

NITRIC OXIDE GMIS

NIST SRM NO.

vssrm#1683b

CYLINDER NO.

CC 137757

CONCENTRATION

48.4 ppm

### ANALYZER READINGS

R=REFERENCE STANDARD

Z=ZERO GAS

C=GAS CANDIDATE

1. COMPONENT	NITRIC OXIDE	GMIS	ANALYZER MAKE-MODEL-S/N	BECKMAN 951A S/N#0101354	LAST CALIBRATION DATE	11/03/03
ANALYTICAL PRINCIPLE		CHEMILUMINESCENCE			SECOND ANALYSIS DATE	12/03/03
FIRST ANALYSIS DATE		11/26/03				
Z 0.0	R 448.2	C 368.8	CONC. 39.8	Z 0.0	R 448.3	C 368.7 CONC. 39.8
R 448.3	Z 0.0	C 368.4	CONC. 39.8	R 448.2	Z 0.0	C 369.2 CONC. 39.9
Z 0.0	C 367.7	R 448.2	CONC. 39.7	Z 0.0	C 369.5	R 448.8 CONC. 39.8
U/M mV		MEAN TEST ASSAY	39.8 ppm	U/M mV		MEAN TEST ASSAY 39.8 ppm

VALUES NOT VALID BELOW 150 psig. NOX VALUE FOR REFERENCE ONLY.

THIS CYLINDER NO. SA 15339  
HAS BEEN CERTIFIED ACCORDING TO SECTION  
OF TRACEABILITY PROTOCOL NO. REV. 9/97  
PROCEDURE G1  
CERTIFIED ACCURACY  $\pm 1$  % NIST TRACEABLE  
CYLINDER PRESSURE 2000 PSIG  
CERTIFICATION DATE 12/03/03  
EXPIRATION DATE 12/03/05 TERM 24 MONTHS

EPA-600/R97/121

CERTIFIED CONCENTRATION

NITRIC OXIDE

39.8 ppm

NITROGEN

BALANCE

ANALYZED BY

CHRIS VU

CERTIFIED BY

HELENA TRAN

IMPORTANT

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## CERTIFICATE OF ANALYSIS / EPA PROTOCOL GAS

CUSTOMER TAIX

P.O. NUMBER

### REFERENCE STANDARD

COMPONENT

NIST SRM NO.

CYLINDER NO.

CONCENTRATION

NITRIC OXIDE

GMIS

vs. SRM#1687

CC 108618

1005 ppm

### ANALYZER READINGS

R=REFERENCE STANDARD

Z=ZERO GAS

C=GAS CANDIDATE

1. COMPONENT	NITRIC OXIDE		GMIS	ANALYZER MAKE-MODEL-S/N	Beckman 951A	S/N 0101354
ANALYTICAL PRINCIPLE			Chemiluminescence	LAST CALIBRATION DATE		05/08/03
FIRST ANALYSIS DATE	05/12/03		SECOND ANALYSIS DATE		05/19/03	
Z 0.0	R 905.1	C 733.1	CONC. 814.0	Z 0.0	R 919.2	C 744.2 CONC. 813.7
R 912.9	Z 0.0	C 740.6	CONC. 815.3	R 927.4	Z 0.0	C 750.9 CONC. 813.7
Z 0.0	C 743.8	R 918.1	CONC. 814.2	Z 0.0	C 752.3	R 929.5 CONC. 813.4
U/M mV		MEAN TEST ASSAY	814.5 ppm	U/M mV		MEAN TEST ASSAY 813.6 ppm

NOx values for reference only.

All values not valid below 150 psig.

THIS CYLINDER NO.	SA 8332	CERTIFIED CONCENTRATION		
HAS BEEN CERTIFIED ACCORDING TO SECTION		EPA-600/R97/121	NITRIC OXIDE	814 ppm
OF TRACEABILITY PROTOCOL NO.	Rev. 9/97		NITROGEN	BALANCE
PROCEDURE	G1		NOx	819 ppm
CERTIFIED ACCURACY	± 1	% NIST TRACEABLE		
CYLINDER PRESSURE	2000	PSIG		
CERTIFICATION DATE	05/19/03			
EXPIRATION DATE	05/19/05	TERM 24 MONTHS		

ANALYZED BY

HELENA TRAN

CERTIFIED BY

CHRIS VU

#### IMPORTANT

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PRAXAIR

LOS ANGELES LABORATORY

THIS CYLINDER NO. CC 181169 HAS BEEN ANALYZED  
ACCORDING TO SECTION EPA-600/R97/121 PROTOCOL Rev. 9/97  
PROCEDURE "G1" ANALYZED BY VICTOR DOTAN

NIST REFERENCE MATERIALS USED FOR THIS PROTOCOL ANALYSIS

COMPONENT	SRM NO.	CYL NO.	CONC.
CARBON MONOXIDE	GMIS	vs. SRM#1681 CC 83706	994 ppm

PRAXAIR

EPA PROTOCOL GAS

CUSTOMER TIAX CORP

CYLINDER NO. CC 181169

CERTIFICATION DATE 02/06/04

CERTIFIED CONCENTRATION:

CARBON MONOXIDE

858 ppm

NITROGEN

BALANCE

2000 PSIG  
TERM 16 MONTHS

Values not valid below 150 psig  
NIST TRACABLE  
EXPIRATION DATE 02/06/07

## EPA METHOD 205

### GAS DILUTION SYSTEM FIELD EVALUATION

Manufacturer: Environics

Model: Series 4040

S/N: 2254

Last calibration date: 6/16/2004

Client: Kirby Canyon

Date: 1/6/2005

Operator: B Johnston

Calibration analyzer: Ecophysics NOx MFC No: 3

Diluent gas: 819

Cylinder No.: SA8332

#### Expected Result

High Dilution concentration: 80

Mid Dilution concentration: 40

Mid level calibration gas: 40.3 (must be within 10% of dilution level 1 or 2)

Cylinder No.: SA 15339

Observed Result	High Dilution	Mid Dilution	Cal gas direct	Result
Run 1	80.3	39.8	39.9	
Difference from average	-0.2%	-0.6%	-0.3%	<b>Pass</b>
Run 2	80.9	40.1	40.0	
Difference from average	0.5%	0.2%	0.0%	<b>Pass</b>
Run 3	80.3	40.2	40.1	
Difference from average	-0.2%	0.4%	0.2%	<b>Pass</b>
Avg	80.50	40.03	40.00	
Difference	-0.63%	-0.08%	0.74%	<b>Pass</b>

All parameters must be within 2%

% Difference = (Expected -observed) / expected x 100

A field check must be performed for each mass flow controller used

## Environic Field Check

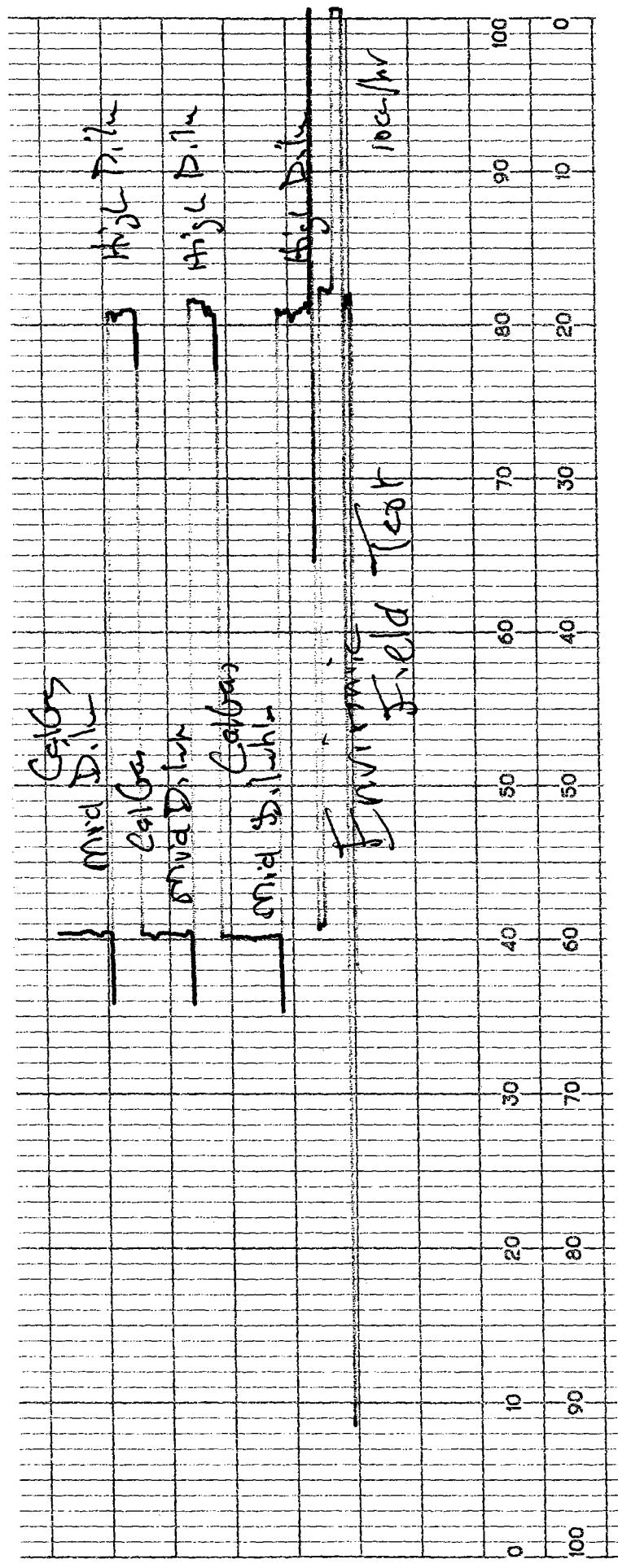
Operator: B Johnston

Plant Name: Kirby

Location: Flare

Date 1/6/2005

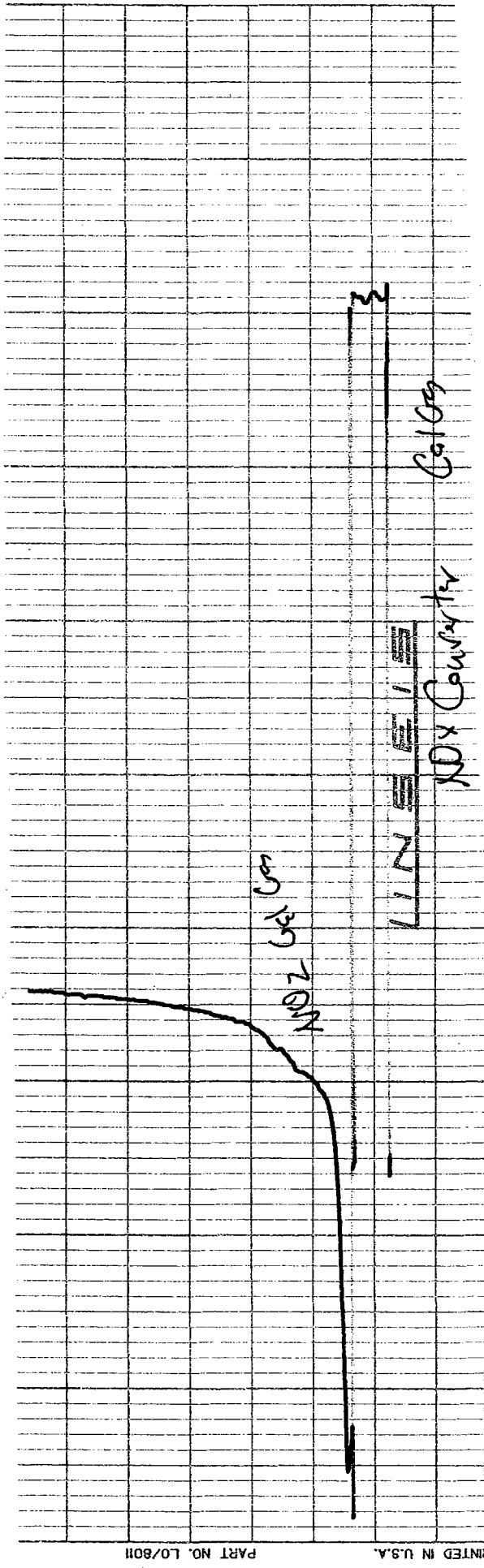
		NOx ppm	
Start Averaging		80.2	
		80.4	
Average	78 samples	80.3	High Dilution
		54.5	
Start Averaging		39.9	
		39.8	
Average	56 samples	39.8	Mid Dilution
		39.9	
Start Averaging		39.9	
		39.9	
Average	78 samples	39.9	Cal Gas
Start Averaging		71.4	
		80.8	
Average	78 samples	80.9	High Dilution
		78.8	
Start Averaging		40.0	
		40.2	
Average	78 samples	40.1	Mid Dilution
Start Averaging		40.2	
		39.9	
Average	81 samples	40.0	Cal Gas
		40.1	
Start Averaging		79.1	
		80.3	
Average	79 samples	80.3	High Dilution
		70.5	
Start Averaging		40.2	
		40.1	
Average	89 samples	40.2	Mid Dilution
Start Averaging		40.2	
		40.1	
Average	80 samples	40.1	Cal Gas



## Nox Converter Check

Facility Kirby Canyon  
 Date 1/6/2005  
 Process Flare

		NOx	Result
		ppm	Requirement > 90%
1/6/2005	12:38:09	30.368	Efficiency 92.6% Pass
1/6/2005	12:39:09	39.871	
1/6/2005	12:40:09	40.322 NO Cal gas	
1/6/2005	12:41:09	40.249	
1/6/2005	12:42:09	11.411	NOx Cal Gas 40.3 ppm
1/6/2005	12:43:09	14.038 NO2 cal Gas	NO2 Cal gas 18.8 ppm
1/6/2005	12:44:09	15.08	
1/6/2005	12:45:09	15.552	
1/6/2005	12:46:09	15.867	Calculation
1/6/2005	12:47:09	16.112	CEM response/NO2 cal gas
1/6/2005	12:48:09	16.479	
1/6/2005	12:49:09	16.668	
1/6/2005	12:50:10	16.768	
Start Averaging			
1/6/2005	12:51:10	16.896	
1/6/2005	12:52:10	16.974	
1/6/2005	12:53:10	17.07	
1/6/2005	12:54:10	17.153	
1/6/2005	12:55:10	17.205	
1/6/2005	12:56:10	17.263	
1/6/2005	12:57:10	17.331	
1/6/2005	12:58:10	17.387	
1/6/2005	12:59:10	17.429	
1/6/2005	13:00:10	17.469	
1/6/2005	13:01:09	17.502	
1/6/2005	13:02:10	17.547	
1/6/2005	13:03:10	17.578	
1/6/2005	13:04:10	17.616	
1/6/2005	13:05:10	17.613	
1/6/2005	13:06:09	17.668	
1/6/2005	13:07:10	17.686	
Average	619 samples	17.404	





Praxair  
5700 South Alameda Street  
Los Angeles, CA 90058  
Telephone: (323) 585-2154  
Facsimile: (714) 542-6689

## CERTIFICATE OF ANALYSIS / EPA PROTOCOL GAS

CUSTOMER SHAW ENV

PO NUMBER BJ111004

### REFERENCE STANDARD

COMPONENT	TYPE	NIST SRM NO.	CYLINDER NO.	CONCENTRATION
NITRIC OXIDE	GMIS	VS.SRM#2629a	CC 145830	24.78 ppm

### ANALYZER READINGS

R = REFERENCE STANDARD

Z = ZERO GAS

C = CANDIDATE GAS

1. COMPONENT NITROGEN DIOXIDE (as NOx)

ANALYZER MAKE-MODEL-S/N Thermo Envin. 42H S/N 42-44979-273

ANALYTICAL PRINCIPLE CHEMILUMINESCENCE

LAST CALIBRATION DATE

12/2/04

FIRST ANALYSIS DATE 12/16/04

SECOND ANALYSIS DATE

12/27/04

Z	0.00	R	24.85	C	18.84	CONC.	18.8	Z	0.00	R	24.30	C	18.36	CONC.	18.7
R	25.00	Z	0.00	C	18.99	CONC.	18.8	R	24.32	Z	0.00	C	18.34	CONC.	18.7
Z	0.00	C	19.01	R	25.02	CONC.	18.8	Z	0.00	C	18.36	R	24.31	CONC.	18.7
U/M	ppm				MEAN TEST ASSAY		18.8	U/M	ppm				MEAN TEST ASSAY		18.7

VALUES NOT VALID BELOW 150 PSIG  
NO VALUE FOR REFERENCE ONLY, NO=1.0 ppm

CYLINDER NUMBER: FF 36326  
HAS BEEN CERTIFIED ACCORDING TO SECTION 2.2  
OF TRACEABILITY PROTOCOL NO. EPA-600/R97/121  
PROCEDURE G1  
CERTIFIED ACCURACY  $\pm 1\%$  NIST TRACEABLE  
CYLINDER PRESSURE 2000 PSIG  
CERTIFICATION DATE 12/27/04  
EXPIRATION 6/27/05 TERM 6 MONTHS

### CERTIFIED CONCENTRATION

COMPONENT	CONCENTRATION
NITROGEN DIOXIDE (as NOx)	18.8 ppm
NITROGEN	BALANCE

ANALYZED BY

JOSEPH CHARLES

CERTIFIED BY

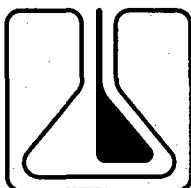
PHIL KIM

### IMPORTANT

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*Appendix F*  
*Analytical Results*

*Zalco Laboratories, Inc.*  
*Atmospheric Analysis & Consulting, Inc.*



# ZALCO LABORATORIES, INC.

Analytical & Consulting Services

4309 Armour Avenue  
Bakersfield, California 93308

(661) 395-0539  
FAX (661) 395-3069

Tuesday, January 11, 2005

Bill Johnston  
Shaw Environmental, Inc.  
2360 Bering  
San Jose, CA 95131  
TEL: (408) 382-5800  
FAX (408) 433-1912

**JAN 18 2004**

RE: Kirby Landfill

Order No.: 0501082

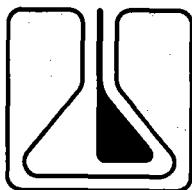
Dear Bill Johnston:

Zalco Laboratories, Inc. received 3 sample(s) on 1/7/05 for the analyses presented in the following report.

We appreciate your business and look forward to serving you in the future. Please feel free to call our office if you have any questions regarding these test results.

Sincerely,

Zalco Laboratories, Inc.



**ZALCO LABORATORIES, INC.**  
Analytical & Consulting Services

4309 Armour Avenue  
Bakersfield, California 93308

(661) 395-0539  
FAX (661) 395-3069

Shaw Environmental Inc.  
2360 Bering  
San Jose CA 95131

Attention: Bill Johnston

Laboratory No: 0501082-001  
Date Received: 01/07/2005  
Date Analyzed: 01/07/2005  
Purchase Order:  
Date Reprinted: 01/07/2005  
Test Code: 1635

Sample Description: R1, Landfill Gas

Sampled: 01/06/2005 @ 9:49AM by Client

Chromatographic Analysis, ASTM D-1945-81, ASTM D-3588-89, GPA 2145-94

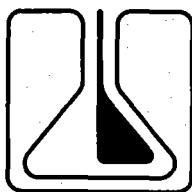
Constituent:	Mole %	Weight %	Gas Liquids, Gallons per 1000 cubic feet	CHONS%
Oxygen	1.496	1.714		36.11
Nitrogen	14.471	14.508		
Carbon Dioxide	35.496	55.910		Hydrogen, H 7.00
Carbon Monoxide	0.000	0.000		
Methane	48.536	27.868		Oxygen, O 42.38
Ethane	0.000	0.000		
Propane	0.000	0.000	0.000	Nitrogen, N 14.51
IsoButane	0.000	0.000	0.000	
n-Butane	0.000	0.000	0.000	
IsoPentane	0.000	0.000	0.000	Sulfur, S 0.00
n-Pentane	0.000	0.000	0.000	
Hexanes +	0.000	0.000	0.000	
<b>Totals:</b>	<b>100.000</b>	<b>100.000</b>	<b>0.000</b>	<b>100.00</b>

Gas Properties calculated at STP: degrees F.	60.00	H/C Ratio:
Measurement Base Pressure at STP: psia	14.696	0.19

Gross Btu/Cu.Ft.,	Dry Gas HHV	491.5	Relative Gas Density; Ideal gas:	0.9647
Ideal Gross Btu/Lb.	Dry Gas HHV	6658.0	Specific Gravity, (Air = 1) Real gas:	0.9667
Net Btu/Cu.Ft.	Dry Gas LHV	442.6	Real Gas Density, Lb/Cu.Ft.	0.07382
Ideal Net Btu/Lb	Dry Gas LHV	5994.7	Specific Volume, Cu.Ft./Lb	13.5458
Gross Btu/Cu.Ft., water saturated		490.2	Compressibility, 'z'	0.9974

	Gross or HHV:	Net or LHV:
"F" Factor, DSCF/MMBtu at 60F.	9362.5	10556.7
"F" Factor, DSCF/MMBtu at 68F.	9505.1	10556.7
"F" Factor, DSCF/MMBtu at 70F.	9541.2	10596.9
"FC" Factor, DSCF CO2/MMBtu60F.	1715.0	1904.7
"FC" Factor, DSCF CO2/MMBtu68F.	1741.1	1933.7

Robert Cortez, Laboratory Manager



**ZALCO LABORATORIES, INC.**  
Analytical & Consulting Services

4309 Armour Avenue  
Bakersfield, California 93308

(661) 395-0539  
FAX (661) 395-3069

Shaw Environmental Inc.  
2360 Bering  
San Jose CA 95131

Laboratory No: 0501082-002  
Date Received: 01/07/2005  
Date Analyzed: 01/07/2005  
Purchase Order:  
Date Reprinted: 01/07/2005  
Test Code: 1635

Attention: Bill Johnston

Sample Description: R2, Landfill Gas

Sampled: 01/06/2005 @ 10:38AM by Client

Chromatographic Analysis, ASTM D-1945-81, ASTM D-3588-89, GPA 2145-94

Constituent:	Mole %	Weight %	Gas Liquids, Gallons per 1000 cubic feet	CHONS%
Oxygen	1.348	1.545		36.42
Nitrogen	13.934	13.974		
Carbon Dioxide	35.781	56.375		Hydrogen, H 7.06
Carbon Monoxide	0.000	0.000		
Methane	48.936	28.106		Oxygen, O 42.54
Ethane	0.000	0.000		
Propane	0.000	0.000	0.000	Nitrogen, N
IsoButane	0.000	0.000	0.000	13.97
n-Butane	0.000	0.000	0.000	
IsoPentane	0.000	0.000	0.000	Sulfur, S
n-Pentane	0.000	0.000	0.000	0.00
Hexanes +	0.000	0.000	0.000	

Totals:	100.000	100.000	0.000	100.00
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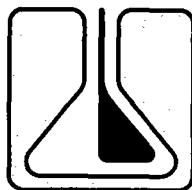
Gas Properties calculated at STP: degrees F.	60.00	H/C Ratio:
Measurement Base Pressure at STP: psia	14.696	0.19

486.2 C10F

Gross Btu/Cu.Ft.,	Dry Gas HHV	495.6	Relative Gas Density; Ideal gas:	0.9645
Ideal Gross Btu/Lb.	Dry Gas HHV	6714.8	Specific Gravity, (Air = 1) Real gas:	0.9665
Net Btu/Cu.Ft.	Dry Gas LHV	446.2	Real Gas Density, Lb/Cu.Ft.	0.07380
Ideal Net Btu/Lb	Dry Gas LHV	6045.9	Specific Volume, Cu.Ft./Lb	13.5494
Gross Btu/Cu.Ft., water saturated		494.3	Compressibility, 'z'	0.9973

	Gross or HHV:	Net or LHV:
"F" Factor, DSCF/MMBtu at 60F.	9361.2	10555.3
"F" Factor, DSCF/MMBtu at 68F.	9503.8	10555.3
"F" Factor, DSCF/MMBtu at 70F.	9539.9	10595.4
"FC" Factor, DSCF CO2/MMBtu60F.	1714.8	1904.6
"FC" Factor, DSCF CO2/MMBtu68F.	1740.9	1933.6

  
Robert Cortez, Laboratory Manager



**ZALCO LABORATORIES, INC.**  
Analytical & Consulting Services

4309 Armour Avenue  
Bakersfield, California 93308

(661) 395-0539  
FAX (661) 395-3069

Shaw Environmental Inc.  
2360 Bering  
San Jose CA 95131

Laboratory No: 0501082-003  
Date Received: 01/07/2005  
Date Analyzed: 01/07/2005  
Purchase Order:  
Date Reprinted: 01/07/2005  
Test Code: 1635

Attention: Bill Johnston

Sample Description: R3, Landfill Gas  
Sampled: 01/06/2005 @ 11:27AM by Client

Chromatographic Analysis, ASTM D-1945-81, ASTM D-3588-89, GPA 2145-94

Constituent:	Mole %	Weight %	Gas Liquids, Gallons per 1000 cubic feet	CHONS%
Oxygen	1.164	1.334		36.87
Nitrogen	13.136	13.184		
Carbon Dioxide	36.148	56.998		Hydrogen, H 7.16
Carbon Monoxide	0.000	0.000		
Methane	49.552	28.483		Oxygen, O 42.79
Ethane	0.000	0.000		
Propane	0.000	0.000	0.000	Nitrogen, N 13.18
IsoButane	0.000	0.000	0.000	
n-Butane	0.000	0.000	0.000	
IsoPentane	0.000	0.000	0.000	Sulfur, S 0.00
n-Pentane	0.000	0.000	0.000	
Hexanes +	0.000	0.000	0.000	

Totals:	100.000	100.000	0.000	100.00
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Gas Properties calculated at STP: degrees F.	60.00	H/C Ratio:
Measurement Base Pressure at STP: psia	14.696	0.19

Gross Btu/Cu.Ft.,	Dry Gas HHV	501.8	Relative Gas Density; Ideal gas:	0.9637
Ideal Gross Btu/Lb.	Dry Gas HHV	6804.8	Specific Gravity, (Air = 1) Real gas:	0.9657
Net Btu/Cu.Ft.	Dry Gas LHV	451.8	Real Gas Density, Lb/Cu.Ft.	0.07375
Ideal Net Btu/Lb	Dry Gas LHV	6126.9	Specific Volume, Cu.Ft./Lb	13.5598
Gross Btu/Cu.Ft., water saturated		500.5	Compressibility, 'z'	0.9973

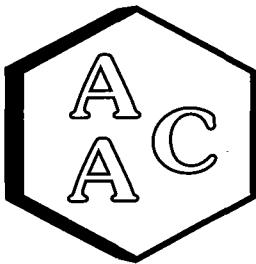
	Gross or HHV:	Net or LHV:
"F" Factor, DSCF/MMBtu at 60F.	9355.3	10548.6
"F" Factor, DSCF/MMBtu at 68F.	9497.7	10548.6
"F" Factor, DSCF/MMBtu at 70F.	9533.8	10588.6
"FC" Factor, DSCF CO2/MMBtu60F.	1713.1	1902.7
"FC" Factor, DSCF CO2/MMBtu68F.	1739.2	1931.7

  
Robert Cortez, Laboratory Manager

Laboratory Zaleo

## Shaw Environmental Chain Of Custody Record

CLIENT		Kirby Landfill		0501082	DATE: 1-6-05
					PAGE: 1 of 1
SAMPLING COMPANY: Shaw Environmental, Inc.		LOG CODE:		SITE ADDRESS (Street and City):	
ADDRESS: 2360 Bering San Jose, CA 95131		EDF DELIVERABLE TO (Responsible Party or Designee):		PHONE NO.:	E-MAIL:
PROJECT CONTACT (Hardcopy or PDF Report to): Bill Johnston		SAMPLER NAME(S) (Print):		CONSULTANT PROJECT NO.:	
TELEPHONE: 408.382.5800	FAX: 408.433.1912	E-MAIL:			
TURNAROUND TIME (BUSINESS DAYS):		REQUESTED ANALYSIS			
<input type="checkbox"/> 10 DAYS <input type="checkbox"/> 5 DAYS <input type="checkbox"/> 72 HOURS <input type="checkbox"/> 48 HOURS <input type="checkbox"/> 24 HOURS <input type="checkbox"/> LESS THAN 24 HOURS		<input type="checkbox"/> Compliance Landfill Gas D1945-81, 3588-89, GPA 2145-94  <input type="checkbox"/> TO 15, report AP 42 list  <input type="checkbox"/> Sulfur species, TRS D-5504  <input type="checkbox"/> EPA M25-C, NMOC as methane			
SPECIAL INSTRUCTIONS OR NOTES:  Report NMOC concentrations as methane		FIELD NOTES:  Container/Preservative or PID Readings or Laboratory Notes  Landfill Gas			
LAB USE ONLY	Field Sample Identification	SAMPLING DATE	MATRIX	NO. OF CONT.	
	R1, Landfill Gas	1-601 0949	air	1	X
	R2, "	↓ 1038		1	X
	R3, "	↓ 1127		1	Y
Relinquished by: (Signature) Bill Johnston		Received by: (Signature) UPS		Date:	Time:
Relinquished by: (Signature) UPS		Received by: (Signature) Elaine Dugay		1/7/05	0823
Relinquished by: (Signature)		Received by: (Signature)		Date:	Time:



## Atmospheric Analysis & Consulting, Inc.

CLIENT : Shaw Environmental, Inc.  
PROJECT NAME : Kirby Landfill  
AAC PROJECT NO. : 050008  
REPORT DATE : 01/10/2005

On January 07, 2005, Atmospheric Analysis & Consulting, Inc. received three (3) Tedlar bags for AP42 analysis, Volatile Organic Compounds analysis by SCAQMD 25C, Sulfur Analysis by ASTM D-5504, Hydrocarbons analysis by EPA method 18 and fixed gas analysis by EPA 3C. Upon receipt the samples were assigned unique Laboratory ID numbers as follows:

Client ID	Lab No.
R1, Landfill Gas	050008-8853
R2, Landfill Gas	050008-8854
R3, Landfill Gas	050008-8855

EPA 25C Analysis - Up to a 1 ml aliquot of gaseous sample is injected into the GC/FID for analysis following EPA25C as specified in the SOW.

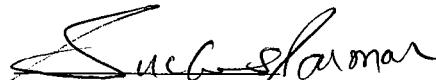
ASTM D-5504 – Up to a 1ml aliquot of sample is injected into the GC/SCD for analysis following ASTM D-5504 as specified in the SOW.

EPA 18 Analysis - Up to a 1 ml aliquot of samples is injected into the GC/FID for analysis following EPA 18 as specified in the SOW.

EPA 3C Analysis - Up to a 1 ml aliquot of samples is injected into the GC/TCD for analysis following EPA 3C as specified in the SOW.

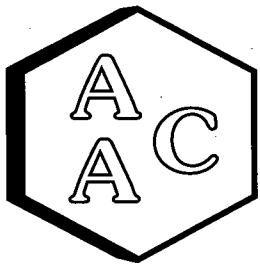
No problems were encountered during receiving, preparation and/ or analysis of these samples. The test results included in this report meet all requirements of the NELAC Standards and/or AAC SOP# AACI- SCAQMD 25C,D-5504, EPA 18 & EPA 3C.

I certify that this data is technically accurate, complete and in compliance with the terms and conditions of the contract. The Laboratory Director or his designee, as verified by the following signature, has authorized release of the data contained in this hardcopy data package.

  
Sucha S. Parmar, PhD  
Technical Director

This report consists of 10 pages.





# Atmospheric Analysis & Consulting, Inc.

## *Laboratory Analysis Report*

Client: : Shaw Environmental, Inc.  
Project No. : 050008  
Matrix : air  
Units : %

Sampling Date : 01/06/2005  
Receiving Date : 01/07/2005  
Analysis Date : 01/07/2005  
Report Date : 01/10/2005

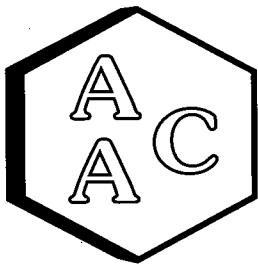
### *EPA Method 3C*

Detection Limit: 0.1 %		Analyte				
Client ID	AAC ID	Oxygen	Nitrogen	CO	Methane	CO2
R1, Landfill	050008-8853	1.6	15	ND	49	35
R2, Landfill	050008-8854	1.4	15	ND	49	35
R3, Landfill	050008-8855	1.6	15	ND	49	35



Dr. Sucha Parmar  
Technical Director





*Laboratory Analysis Report*

CLIENT : Shaw Environmental, Inc.  
 PROJECT N: 050008  
 UNITS : PPMV

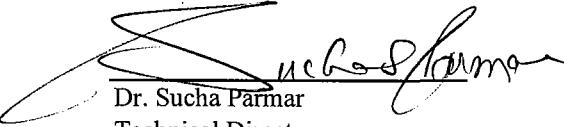
SAMPLING DATE : 01/06/2005  
 RECEIVING DATE : 01/07/2005  
 ANALYSIS DATE : 01/07/2005  
 REPORT DATE : 01/10/2005

**Total Reduced Sulfur Compounds Analysis by ASTM D-5504**

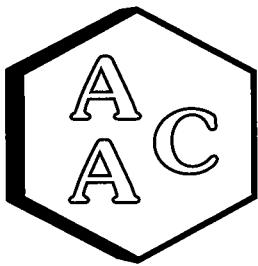
Compounds	Client ID. AAC ID	R1, Landfill 050008-8853	R2, Landfill 050008-8854	R3, Landfill 050008-8855	MDL
Analysis Dilution Factor	1	1	1		
Can Dilution Factor	1	1	1		
H <sub>2</sub> S	33	33	37	0.05	
Carbonyl Sulfide & SO <sub>2</sub>	<PQL	<PQL	<PQL	0.05	
Methyl Mercaptan	2.1	2.0	2.2	0.05	
Ethyl Mercaptan	0.2	0.1	0.3	0.05	
Dimethyl Sulfide	4.6	4.5	5.0	0.05	
n-Butyl mercaptan	<PQL	<PQL	<PQL	0.05	
Carbon Disulfide	0.1	0.1	0.1	0.05	
Allyl Sulfide	<PQL	<PQL	<PQL	0.05	
Propyl Sulfide	<PQL	<PQL	<PQL	0.05	
Allyl disulfide	<PQL	<PQL	<PQL	0.05	
Isopropyl Mercaptan	0.41	0.4	0.5	0.05	
t-Butyl mercaptan	<PQL	<PQL	0.1	0.05	
Propyl Mercaptan	<PQL	<PQL	<PQL	0.05	
Butyl Sulfide	0.1	<PQL	0.1	0.05	
Ethyl methyl sulfide	<PQL	<PQL	<PQL	0.05	
Thiophene	<PQL	<PQL	<PQL	0.05	
Isobutyl mercaptan	<PQL	<PQL	<PQL	0.05	
Dimethyl disulfide	0.1	0.1	0.1	0.05	
Allyl mercaptan	<PQL	<PQL	<PQL	0.05	
3-Methylthiophene	<PQL	<PQL	<PQL	0.05	
Tetrahydrothiophene	<PQL	<PQL	<PQL	0.05	
Diethyl sulfide	<PQL	<PQL	<PQL	0.05	
2-Ethylthiophene	<PQL	<PQL	<PQL	0.05	
2,5-Dimethylthiophene	<PQL	<PQL	<PQL	0.05	
Diethyl disulfide	<PQL	<PQL	<PQL	0.05	
Total Unidentified Sulfurs as H <sub>2</sub> S	1.3	1.1	1.6	0.05	
Total Reduced Sulfurs	41	41	47	0.05	

PQL = Practical Quantitation Limit (MDL x Analysis Dilution factor)

All compounds concentrations expressed in terms of H<sub>2</sub>S.

  
 Dr. Sucha Parmar  
 Technical Director





## Atmospheric Analysis & Consulting, Inc.

### *Laboratory Analysis Report*

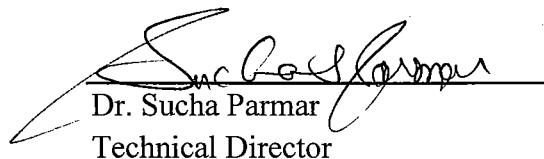
Client : Shaw Environmental, Inc.  
Project No. : 050008  
Matrix : air  
Units : ppmv

Sampling Date : 01/06/2005  
Receiving Date : 01/07/2005  
Analysis Date : 01/07/2005  
Report Date : 01/10/2005

#### EPA Method 25C

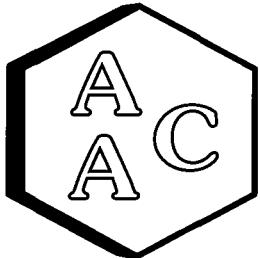
<i>Detection Limit:</i>		0.3 ppmv
Client Sample ID	AAC ID	NMHC**
Run 1, Land Fill Gas	050008-8853	1404
Run 2, Land Fill Gas	050008-8854	1780
Run 3, Land Fill Gas	050008-8855	2066

\*\*Non-Methane Hydrocarbons as methane



Dr. Sucha Parmar  
Technical Director





# Atmospheric Analysis & Consulting, Inc.

## Laboratory Analysis Report

CLIENT: : Shaw Environmental, Inc.  
PROJECT NO. : 050008  
MATRIX : AIR  
UNITS : PPMV

SAMPLING DATE : 01/06/2005  
RECEIVING DATE : 01/07/2005  
ANALYSIS DATE : 01/07/2005  
REPORT DATE : 01/10/2005

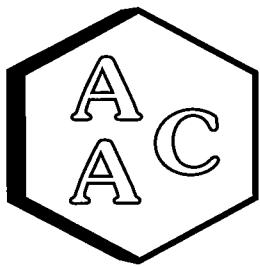
Client ID	AAC ID	ANALYSIS METHOD		EPA Method 18				
		Detection Limit		0.3 ppmv				
		C1*	C2	C3	C4	C5	C6	C6+
R1, Landfill Gas	040570-8303	*	ND	37	29	59	57	176
R2, Landfill Gas	040570-8303	*	ND	40	26	69	63	171
R3, Landfill Gas	040570-8303	*	ND	34	31	83	79	232

\* C1 values form EPA 3C



Dr. Sucha Parmar  
Technical Director





# Atmospheric Analysis & Consulting, Inc.

## *Quality Control/Quality Assurance Report*

Date Analyzed : 01/07/2005

### I-Method Blank EPA method 25C

Analyte	Units	Sample Analysis
NMHC	ppm	ND

### II-LCS

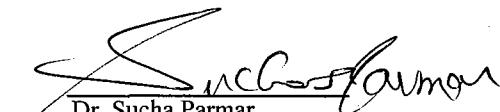
Analyte	Units	True	LCS	LCS	% Rec	% RPD
		Conc.	Conc.	Conc. Dup		
NMHC	ppm	100	89	91	90	1.7

### III-Duplicate Analysis - 050008-8853

Analyte	Units	Sample	Duplicate	Mean	% RPD
		Analysis	Analysis		
NMHC	ppm	519	502	511	3.3

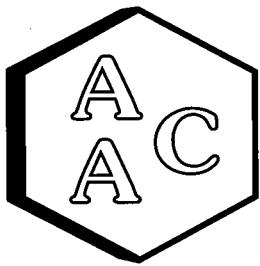
### IV-Matrix Spikes - 050008-8853

Analyte	Units	Sample Conc.	Spike Added	Sample Spike Conc.	Sample Spike Dupl. Conc.	Spike % Rec.	Spike Dupl % Rec.	% RPD
NMHC	ppm	251	50	287	296	72	90	22



Dr. Sucha Parmar,  
President





# Atmospheric Analysis & Consulting, Inc.

## Quality Control/Quality Assurance Report

Date Analyzed : 01/07/2005

### I-Method Blank - EPA 3C

	Analyte	Units	Sample Analysis
Method Blank	Hydrogen	%	ND
	Oxygen	%	ND
	Nitrogen	%	ND
	CO	%	ND
	Methane	%	ND
	CO2	%	ND

### II-LCS - EPA 3C

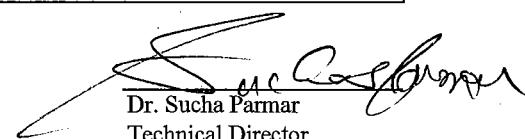
	Analyte	Spike Conc.	LCS Conc.	LCS Dup Conc.	% Rec	% RPD
LCS	Hydrogen	20	22	20	105	6.3
	Nitrogen	20	26	25	128	0.2
	CO	20	21	21	105	2.9
	Methane	20	24	24	119	2.2
	CO2	20	23	23	114	2.2

### III-Duplicate Analysis -EPA 3C

AAC ID	Analyte	Units	Sample Analysis	Duplicate Analysis	Mean	% RPD
050008-8853	Hydrogen	%	0.0	0.0	0.0	0.0
	Oxygen	%	1.6	1.8	1.7	7.1
	Nitrogen	%	16	17	17	1.4
	CO	%	0.0	0.0	0.0	0.0
	Methane	%	53	52	53	1.1
	CO2	%	38	37	38	1.0

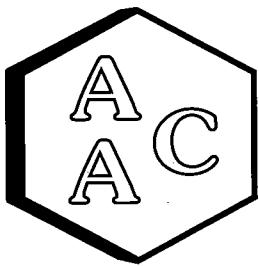
### IV-Matrix Spike Analysis -EPA 3C-050008-8853

Analyte	Sample Conc.	Spike Added	Sample Spike Conc.	Sample Spike Dupl. Conc.	Spike % Rec.	Spike Dupl. % Rec.	% RPD
Hydrogen	0.0	10	9.4	9.2	94	92	1.9
Nitrogen	8.3	10	19	19	108	111	2.6
Carbon Monoxide	0.0	10	10	10	101	100	0.7
Methane	26	10	38	38	119	116	2.6
Carbon Dioxide	19	10	30	29	108	106	2.1



Dr. Sucha Parmar  
Technical Director





# Atmospheric Analysis & Consulting, Inc.

## Quality Control/Quality Assurance Report

Date Analyzed : 01/07/2005

### I - Method Blank

	Analyte	Units	MB Conc.
AAC ID	C1	ppmv	ND
	C2	ppmv	ND
Method Blank	C3	ppmv	ND
	C4	ppmv	ND
	C5	ppmv	ND
	C6	ppmv	ND

### II - LCS

AAC ID	Analyte	Theoretical Conc.	LCS Conc.	LCS Conc. Dup	% Rec	% RPD
Lab Control Standard	Methane	100	88	86	87	2.7
	Ethane	101	89	87	87	2.4
	Propane	100	88	86	87	2.5
	Butane	100	88	87	88	2.0
	Pentane	100	90	88	89	2.5
	Hexane	98	94	91	95	3.0

### III - Duplicate Analysis

AAC ID	Analyte	Units	Sample Conc.	Duplicate Conc.	Mean	% RPD
050008-8853	Propane	ppmv	20	18	19	11
	Butane	ppmv	4.0	4.5	4.3	11
	Pentane	ppmv	0.4	0.4	0.4	0.0
	Hexane	ppmv	4.5	4.8	4.7	7.1

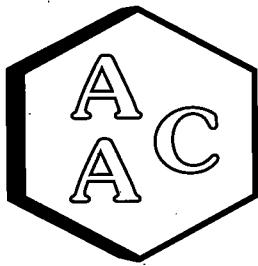
### IV-Spiked Sample - 050008-8853

Units = ppmv

Analyte	Sample	Spike	Spike	Dup Spike	Spike	Spike Dup	RPD**
	Conc.	Added	Res	Res	% Rec *	% Rec *	%
Propane	9.3	50	50	49	81	80	1.5
Butane	2.1	50	45	46	86	87	1.5
Pentane	0.2	50	46	46	92	91	0.6
Hexane	2.3	50	50	49	95	93	2.6

  
Dr. Sucha Parmar  
Technical Director





# Atmospheric Analysis & Consulting, Inc.

## Quality Control/Quality Assurance Report

CLIENT ID : Stewart & Stevenson DATE ANALYZED : 1/7/2005  
AAC ID : 050006 DATE REPORTED : 1/7/2005  
MEDIA : AIR UNITS : ppmv

### I - Duplicate Analysis Report-ASTM D-5504-050006-8848

Compound	Sample Conc	Duplicate Conc	% RPD
H2S	5.4	5.6	2.4

### II-LCS - ASTM D-5504

Analyte	Spike Added	Spike Res	Dup Spike Res	Spike % Rec *	Spike Dup % Rec *	RPD** %
H2S	20	22	21	108	103	5.1

### III-Matrix Spike - ASTM D-5504 - 050006-8848

Analyte	Sample Conc.	Spike Added	Spike Res	Dup Spike Res	Spike % Rec *	Spike Dup % Rec *	RPD** %
H2S	2.7	10	12	13	93	103	10

Dr. Sucha Parmar

Technical Director



Laboratory

AAC

## Shaw Environmental Chain Of Custody Record

CLIENT

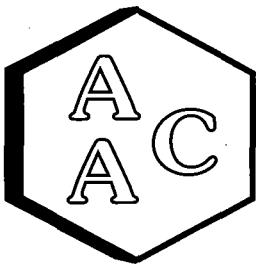
Kirby Landfill

050008

DATE: 1-6-05

PAGE: 1 of 1

SAMPLING COMPANY: Shaw Environmental, Inc.		LOG CODE:		SITE ADDRESS (Street and City):		EDF DELIVERABLE TO (Responsible Party or Designee):		PHONE NO.:		E-MAIL:		CONSULTANT PROJECT NO.:			
ADDRESS: 2360 Bering San Jose, CA 95131		PROJECT CONTACT (Handcopy or PDF Report to): Bill Johnston		SAMPLER NAME(S) (Print):											
TELEPHONE: 408.382.5800		FAX: 408.433.1912		E-MAIL:											
TURNAROUND TIME (BUSINESS DAYS): <input type="checkbox"/> 10 DAYS <input type="checkbox"/> 5 DAYS <input type="checkbox"/> 72 HOURS <input type="checkbox"/> 48 HOURS <input type="checkbox"/> 24 HOURS <input type="checkbox"/> LESS THAN 24 HOURS															
REQUESTED ANALYSIS															
SPECIAL INSTRUCTIONS OR NOTES: <i>Report TO-15 list attached Report NMOC concentrations as methane</i>		FIELD NOTES: Container/Preservative or PID Readings or Laboratory Notes  <i>Landfill Gas</i>													
LAB USE ONLY:	Field Sample Identification	SAMPLING		MATRIX	NO. OF CONT.	Compliance Landfill Gas		TO 15, report AP 42 list		Sulfur-species, TRS D-5504		EPA M25-C, NMOC as methane			
		DATE	TIME			D1945-91, 3588-35, GPA 2145-94									
	R1, Landfill Gas	1/6/05	0949	air	1			X	X	X					
	R2,	"	1038		1			X	X	X					
	R3,	"	1127		1			X	X						
Relinquished by: (Signature)				Received by: (Signature)								Date:		Time:	
Relinquished by: (Signature)				Received by: (Signature)								Date:		Time:	
Relinquished by: (Signature)				Received by: (Signature)								Date:		Time:	
<i>Bill</i>				<i>John</i>								1/6/05		114	



## Atmospheric Analysis & Consulting, Inc.

CLIENT : Shaw Environmental  
PROJECT NAME : Kirby Landfill  
AAC PROJECT NO. : 050008  
REPORT DATE : 01/11/05

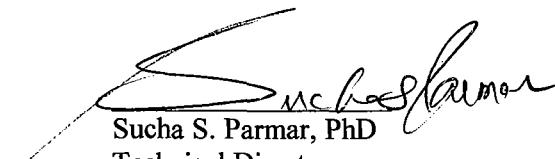
On January 7, 2005, Atmospheric Analysis & Consulting, Inc. received one (1) teflar bag for VOC analysis by EPA method TO-15. Upon receipt the sample was assigned a unique Laboratory ID number as follows:

Client ID	Lab No.
R2, Landfill Gas	050008-8854

TO-14/15 Analysis - Up to a 500ml aliquot of the sample is concentrated, put through a water and CO2 management system, cryofocused, and injected in the GC/MS (full scan mode) for analysis following EPA Method TO-14/15 as specified in the SOW. Holding times for preparation and analysis were complied with.

No problems were encountered during receiving, preparation and/ or analysis of these samples. The test results included in this report meet all requirements of the NELAC Standards and/or AAC SOP# AACI-TO-15. Estimated uncertainty of the test results will be provided upon request.

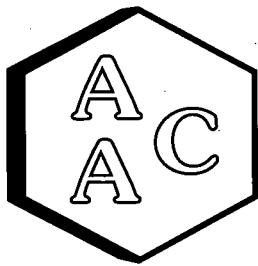
I certify that this data is technically accurate, complete and in compliance with the terms and conditions of the contract. The Laboratory Director or his designee, as verified by the following signature, has authorized release of the data contained in this hardcopy data package.



Sucha S. Parmar, PhD  
Technical Director

This report consists of 8 pages.





# Atmospheric Analysis & Consulting, Inc.

## Laboratory Analysis Report

CLIENT : Shaw Environmental  
PROJECT NO : 050008  
MATRIX : AIR  
UNITS : PPB (v/v)

DATE RECEIVED : 01/07/05  
DATE REPORTED : 01/11/05

### VOLATILE ORGANIC COMPOUNDS BY EPA TO-15

Client ID AAC ID	R2, Landfill Gas		MDL
	050008-8854		
Date Sampled	1/6/2005		PQL
Date Analyzed	1/7/2005		
Can Dilution Factor	1.0		
Chlorodifluoromethane	530	20	1.0
Dichlorodifluoromethane	1013	10	0.5
Chloromethane	31	10	0.5
Vinyl Chloride	335	10	0.5
Chloroethane	78	10	0.5
Dichlorofluoromethane	194	10	0.5
Ethanol	199217	E	50
Trichlorofluoromethane	63	10	0.5
Isopropanol	40768	E	20
Acrylonitrile	120	10	0.5
1,1-Dichloroethylene	51	10	0.5
Methylene Chloride	194	20	1.0
Carbon Disulfide	43	10	0.5
t-1,2-Dichloroethylene	48	10	0.5
1,1-Dichloroethane	103	10	0.5
2-Butanone (MEK)	17783	E	20
Hexane	1524	10	0.5
Chloroform	2.7	J	10
1,2-Dichloroethane	30	20	1.0
1,1,1-Trichloroethane	3.9	J	10
Carbon Tetrachloride	7.6	J	10
1,2-Dichloropropane	14	10	0.5
Bromodichloromethane	40	10	0.5
Trichloroethene	216	20	1.0
4-Methyl-2-Pentanone (MiBK)	1493	10	0.5
Tetrachloroethylene	483	10	0.5
Chlorobenzene	227	10	0.5
Ethylbenzene	3166	10	0.5
m- & p-Xylenes	5283	10	0.5
1,1,2,2-Tetrachloroethane	128	10	0.5
o-Xylene	1805	10	0.5
BFB-Surrogate Std. % Recovery	107%		48-151

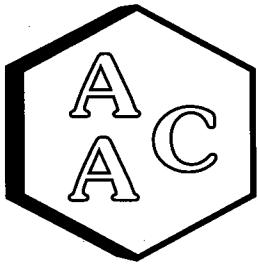
J - Analyte was detected. However the analyte concentration is an estimated value, which is between the Method

Detection Limit (MDL) and the Practical Quantitation Limit (PQL).

E - Estimated value, result outside linear range of instrument.

U - Compound was analyzed for, but was not detected.

Dr. Sucha Parmar  
Technical Director



# Atmospheric Analysis & Consulting, Inc.

## Quality Control/Quality Assurance Report

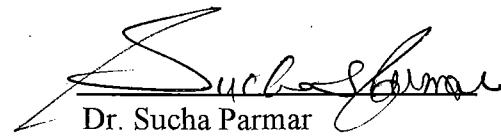
CLIENT ID : Laboratory Control Spike      DATE ANALYZED : 01/07/05  
AAC ID : LCS      DATE REPORTED : 01/10/05  
MEDIA : Air      UNITS : ppbv

### TO-14/15 Laboratory Control Spike Recovery

Compound	Sample Conc.	Spike	Spike	Dup Spike	Spike	Spike Dup	RPD** %
		Added	Res	Res	% Rec *	% Rec *	
1,1-DICHLOROETHYLENE	0.0	50	44	44	88	87	1.1
METHYLENE CHLORIDE	0.0	50	44	44	87	88	1.4
BENZENE	0.0	50	45	51	90	103	13
TRICHLOROETHENE	0.0	50	47	54	95	108	14
TOLUENE	0.0	50	47	57	94	115	19
TETRACHLOROETHYLENE	0.0	50	47	56	95	112	17
CHLOROBENZENE	0.0	50	43	46	86	92	7.0
ETHYLBENZENE	0.0	50	45	49	91	97	6.8
m-, & p- XYLENES	0.0	100	97	103	97	103	6.5
o- XYLENE	0.0	50	47	50	94	100	5.7

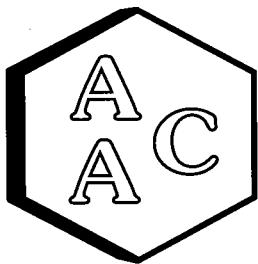
\* Must be 75-125%

\*\* Must be  $\leq$  25%



Dr. Sucha Parmar  
President





# Atmospheric Analysis & Consulting, Inc.

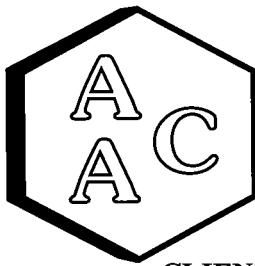
## Quality Control/Quality Assurance Report

CLIENT ID : R-1 RTO Inlet  
AAC ID : 050010-8858  
MATRIX : Air

DATE ANALYZED : 01/07/05  
DATE REPORTED : 01/10/05  
UNITS : ppbv

### TO-14/TO-15 Duplicate Analysis

Compound	Sample Conc	Duplicate Conc	% RPD
Chlorodifluoromethane*	<PQL	<PQL	0.0
Propylene*	22	21	6.4
DiC1D1F1Methane*	<PQL	<PQL	0.0
CHLOROMETHANE*	<PQL	<PQL	0.0
1,2 DiCl-1,1,2,2-TetraFEthane*	<PQL	<PQL	0.0
VINYL CHLORIDE*	<PQL	<PQL	0.0
Methanol*	621	641	3.1
1,3-Butadiene*	<PQL	<PQL	0.0
BROMOMETHANE*	<PQL	<PQL	0.0
CHLOROETHANE*	<PQL	<PQL	0.0
Dichlorofluoromethane	<PQL	<PQL	0.0
Ethanol*	500	395	24
Vinyl Bromide*	<PQL	<PQL	0.0
Acetone*	10355	9291	11
TRICHLOROFLUOROMETHANE*	<PQL	<PQL	0.0
Isopropyl Alcohol*	<PQL	<PQL	0.0
Acrylonitrile*	<PQL	<PQL	0.0
1,1 DICHLOROETHENE*	<PQL	<PQL	0.0
METHYLENE CHLORIDE*	<PQL	<PQL	0.0
Allyl CHLORIDE*	9.3	6.7	32
Carbon disulfide*	<PQL	<PQL	0.0
1,1,2-TRICHLORO-1,2,2-TRIFLUOROETHANE*	<PQL	<PQL	0.0
trans-1,2- DICHLOROETHYLENE*	<PQL	<PQL	0.0
1,1- DICHLOROETHANE*	<PQL	<PQL	0.0
MTBE*	<PQL	<PQL	0.0
Vinyl Acetate*	318	358	12
MEK*	303	286	6.0
cis-1,2- DICHLOROETHYLENE*	<PQL	<PQL	0.0
Hexane*	<PQL	<PQL	0.0
CHLOROFORM*	<PQL	<PQL	0.0
Ethyl Acetate*	15	14	6.7
Tetrahydrofuran*	<PQL	<PQL	0.0
1,2-DICHLOROETHANE*	<PQL	<PQL	0.0
1,1,1-TRICHLOROETHANE*	<PQL	<PQL	0.0
BENZENE**	<PQL	<PQL	0.0
CARBON TETRACHLORIDE**	<PQL	<PQL	0.0
Cyclohexane**	<PQL	<PQL	0.0



# Atmospheric Analysis & Consulting, Inc.

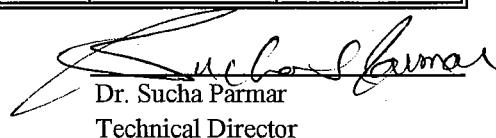
## Quality Control/Quality Assurance Report

CLIENT ID : R-1 RTO Inlet  
AAC ID : 050010-8858  
MATRIX : Air

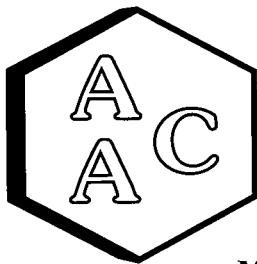
DATE ANALYZED : 01/07/05  
DATE REPORTED : 01/10/05  
UNITS : ppbv

### TO-14/TO-15 Duplicate Analysis

Compound	Sample Conc	Duplicate Conc	% RPD
1,2-DICHLOROPROPANE**	<PQL	<PQL	0.0
Bromodichloromethane**	<PQL	<PQL	0.0
1,4-Dioxane**	<PQL	<PQL	0.0
TRICHLOROETHENE**	<PQL	<PQL	0.0
2,2,4-Trimethylpentane**	<PQL	<PQL	0.0
Heptane**	<PQL	<PQL	0.0
cis- 1,3 DICHLOROPROPENE**	<PQL	<PQL	0.0
MiBK**	<PQL	<PQL	0.0
trans 1,3 DICHLOROPROPENE**	<PQL	<PQL	0.0
1,1,2-TRICHLOROETHANE**	<PQL	<PQL	0.0
TOLUENE**	44	50	13
2-Hexanone**	<PQL	<PQL	0.0
Dibromochloromethane**	<PQL	<PQL	0.0
1,2 DIBROMOETHANE**	<PQL	<PQL	0.0
TETRACHLOROETHYLENE**	<PQL	<PQL	0.0
CHLOROBENZENE***	<PQL	<PQL	0.0
ETHYLBENZENE***	7.4	7.1	4.7
m-, & p- XYLENES***	24	23	6.3
Bromoform***	<PQL	<PQL	0.0
STYRENE***	4981	6237	22
1,1, 2,2- TETRACHLORETHANE***	<PQL	<PQL	0.0
o- XYLENE***	7.9	8.2	4.1
Ethyltoluene***	<PQL	<PQL	0.0
1,3,5- TRIMETHYLBENZENE***	<PQL	<PQL	0.0
1,2,4- TRIMETHYLBENZENE***	<PQL	<PQL	0.0
Benzyl Chloride***	<PQL	<PQL	0.0
1,3- DICHLOROBENZENE***	<PQL	<PQL	0.0
1,4- DICHLOROBENZENE***	<PQL	<PQL	0.0
1,2-DICHLOROBENZENE***	<PQL	<PQL	0.0
1,2,4 TRICHLOROBENZENE***	<PQL	<PQL	0.0
Hexachlorobutadiene	<PQL	<PQL	0.0
System Monitoring Compounds			
BFB-Surrogate Std. % Recovery	86	81	6.0



Dr. Sucha Parmar  
Technical Director



# Atmospheric Analysis & Consulting, Inc.

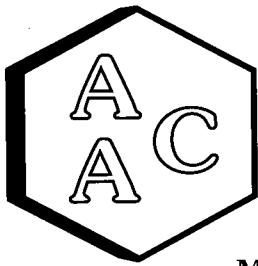
## Method Blank Analysis Report

**MATRIX****: AIR****UNITS****: ppbv****ANALYSIS DATE****: 01/07/05****REPORT DATE****: 01/10/05**

### VOLATILE ORGANIC COMPOUNDS BY EPA TO-14/TO-15

<i>Client ID</i> <i>AAC ID</i>	<b>Method Blank</b>	<b>MDL</b>
	<b>MB010705#1</b>	
Chlorodifluoromethane*	<PQL	1.0
Propylene*	<PQL	0.5
DiClDIFMethane*	<PQL	0.5
CHLOROMETHANE*	<PQL	0.5
1,2 DiCl-1,1,2,2-TetraFEthane*	<PQL	0.5
VINYL CHLORIDE*	<PQL	0.5
Methanol*	<PQL	20
1,3-Butadiene*	<PQL	0.5
BROMOMETHANE*	<PQL	0.5
Dichlorofluoromethane	<PQL	0.5
CHLOROETHANE*	<PQL	0.5
Vinyl Bromide*	<PQL	0.5
Acetone*	<PQL	1.0
TRICHLOROFLUOROMETHANE*	<PQL	0.5
Acrylonitrile*	<PQL	0.5
1,1 DICHLOROETHENE*	<PQL	0.5
METHYLENE CHLORIDE*	<PQL	1.0
Allyl CHLORIDE*	<PQL	0.5
Carbon disulfide*	<PQL	0.5
1,1,2-TRICHLORO-1,2,2-TRIFLUOROETHANE*	<PQL	0.5
trans-1,2- DICHLOROETHYLENE*	<PQL	0.5
1,1- DICHLOROETHANE*	<PQL	0.5
MTBE*	<PQL	0.5
Vinyl Acetate*	<PQL	0.5
MEK*	<PQL	1.0
cis-1,2- DICHLOROETHYLENE*	<PQL	0.5
Hexane*	<PQL	0.5
CHLOROFORM*	<PQL	0.5
Ethyl Acetate*	<PQL	0.5
Tetrahydrofuran*	<PQL	0.5
1,2-DICHLOROETHANE*	<PQL	1.0
1,1,1-TRICHLOROETHANE*	<PQL	0.5
BENZENE**	<PQL	0.5
CARBON TETRACHLORIDE**	<PQL	0.5
Cyclohexane**	<PQL	0.5
1,2-DICHLOROPROPANE**	<PQL	0.5
Bromodichloromethane**	<PQL	0.5
1,4-Dioxane**	<PQL	1.0
TRICHLOROETHENE**	<PQL	1.0
2,2,4-Trimethylpentane**	<PQL	0.5





# Atmospheric Analysis & Consulting, Inc.

## Method Blank Analysis Report

MATRIX  
UNITS

: AIR  
: ppbv

ANALYSIS DATE : 01/07/05  
REPORT DATE : 01/10/05

### VOLATILE ORGANIC COMPOUNDS BY EPA TO-14/TO-15

Client ID AAC ID	Method Blank	MDL
	MB010705#1	
Heptane**	<PQL	0.5
cis- 1,3 DICHLOROPROPENE**	<PQL	0.5
trans 1,3 DICHLOROPROPENE**	<PQL	0.5
MiBK**	<PQL	0.5
1,1,2-TRICHLOROETHANE**	<PQL	0.5
TOLUENE**	<PQL	0.5
2-Hexanone**	<PQL	1.0
Dibromochloromethane**	<PQL	0.5
1,2 DIBROMOETHANE**	<PQL	0.5
TETRACHLOROETHYLENE**	<PQL	0.5
CHLOROBENZENE***	<PQL	0.5
ETHYLBENZENE***	<PQL	0.5
m-, & p- XYLENES***	<PQL	0.5
Bromoform***	<PQL	0.5
STYRENE***	1.65	0.5
1,1, 2,2- TETRACHLORETHANE***	<PQL	0.5
o- XYLENE***	<PQL	0.5
Ethyltoluene***	<PQL	0.5
1,3,5- TRIMETHYLBENZENE***	<PQL	0.5
1,2,4- TRIMETHYLBENZENE***	<PQL	0.5
Benzyl Chloride***	<PQL	1.0
1,3- DICHLOROBENZENE***	<PQL	0.5
1,4- DICHLOROBENZENE***	<PQL	0.5
1,2-DICHLOROBENZENE***	<PQL	0.5
1,2,4 TRICHLOROBENZENE***	<PQL	1.0
HEXACHLOROBUTADIENE***	<PQL	1.0
<b>System Monitoring Compounds</b>		
BFB-Surrogate Std. % Recovery	69%	48-151

PQL - Practical Quantitation Limit



Dr. Sucha Parmar  
Technical Director



Laboratory AAC

Shaw Environmental Chain Of Custody Record

CLIENT Kirby Landfill		O'Fodors		DATE: 1-6-05
				PAGE: 1 of 1
SAMPLING COMPANY: Shaw Environmental, Inc.		LOG CODE:	SITE ADDRESS (Street and City):	
ADDRESS: 2360 Bering San Jose, CA 95131		EDF/DELIVERABLE TO (Responsible Party or Designee):		CONSULTANT PROJECT NO.:
PROJECT CONTACT (Handcopy or PDF Report to): Bill Johnson		PHONE NO.:		
TELEPHONE: 408.382.5800	FAX: 408.433.1912	EMAIL:	E-MAIL:	
TURNAROUND TIME (BUSINESS DAYS): <input type="checkbox"/> 10 DAYS <input type="checkbox"/> 5 DAYS <input type="checkbox"/> 72 HOURS <input type="checkbox"/> 48 HOURS <input type="checkbox"/> 24 HOURS <input type="checkbox"/> LESS THAN 24 HOURS		REQUESTED ANALYSIS		
SPECIAL INSTRUCTIONS OR NOTES:  Report TO-15 list attached Report NMOC concentrations as methane		FIELD NOTES:  Container/Preservative or PID Readings or Laboratory Notes		
		Compliance Landfill Gas D1945-81, 3558-89, GPA 2145-94	TO 15, report AP 42 list	Sulfur species, TRS D5504 EPA M28-C, NMOC as methane
LAB USE ONLY	Field Sample Identification	SAMPLING DATE	MATRIX	NO. OF CONT.
	R1, Landfill Gas	1/6/05 0949	air	1
	R2	1/6/05 1038	air	1
	R3	1/6/05 1127	air	1
Relinquished by: (Signature)		Received by: (Signature)		Date:
Relinquished by: (Signature)		Received by: (Signature)		Date:
Relinquished by: (Signature)		Received by: (Signature)		Date:

*Appendix G*  
*ARB Independent Contractor Program Certification*

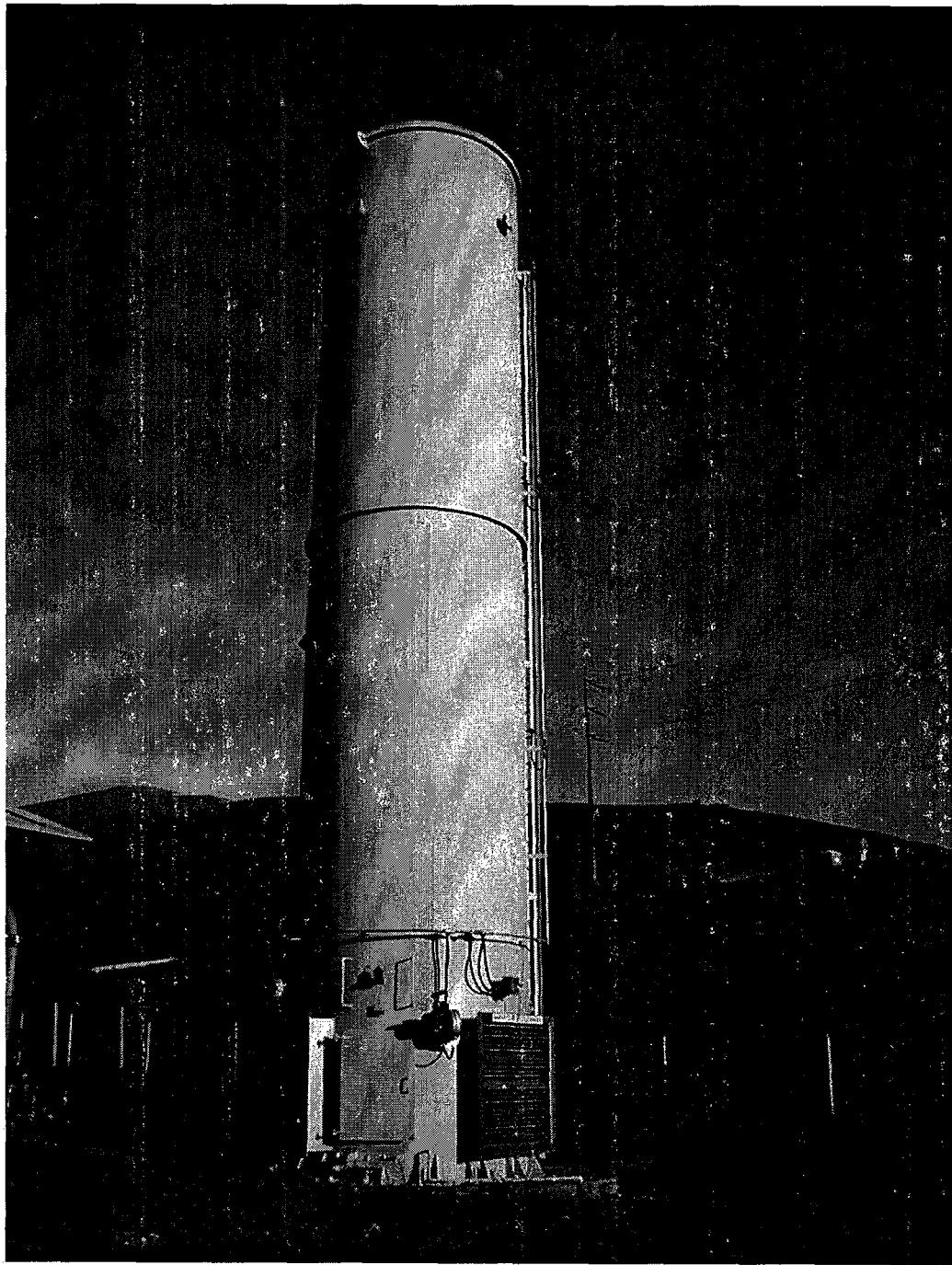
State of California  
Air Resources Board  
Approved Independent Contractor  
Shaw Environmental, Inc.

This is to certify that the company listed above has been approved  
by the Air Resources Board to conduct compliance testing  
pursuant to section 91207, Title 17, California Code of Regulations,  
until June 30, 2005 for those test methods listed below:

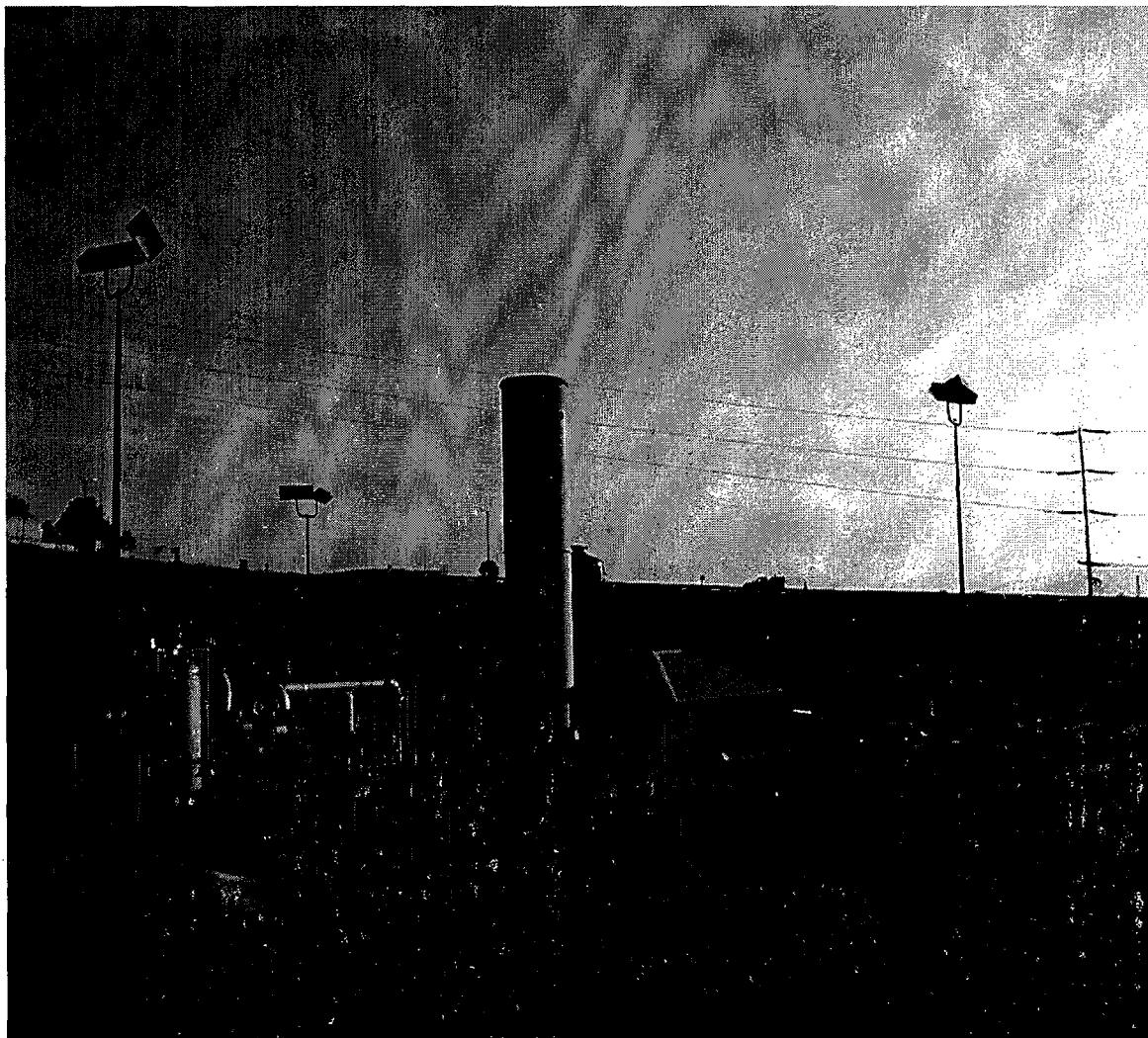
ARB Source Test Methods:  
1, 2, 3, 4, 5, 8, 100 (CO, CO<sub>2</sub>, NO, O<sub>2</sub>, SO<sub>2</sub>, THC)  
Visible Emissions Evaluation

  
William V. Loscutoff, Chief  
Monitoring and Laboratory Division

***Appendix H***  
***Site Pictures***



**KIRBY LANDFILL GAS FLARE A-11**



## **KIRBY GAS CONTROL SYSTEM**