

IV 10/1 /2V

ORIGINAL

PETITION FOR VARIANCE
BEFORE THE HEARING BOARD OF THE
SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

2026 SEP 17 PM 1:27
SOUTH COAST AQMD
CLERK OF THE BOARD

PETITIONER: USA WASTE OF CALIFORNIA, El Sobrante Landfill

CASE NO: 5139-8

FACILITY ID: 113674

FACILITY ADDRESS: 10910 Dawson Canyon Road, Corona, CA 92883

[location of equipment/site of violation; specify business/corporate address, if different, under Item 2, below]

1. TYPE OF VARIANCE REQUESTED (more than one box may be checked; see Attachment A, Item 1, before selecting)

☒ INTERIM ☐ SHORT ☒ REGULAR ☐ EMERGENCY ☐ EX PARTE EMERGENCY

2. CONTACT: Name, title, company (if different than Petitioner), address, and phone number of persons authorized to receive notices regarding this Petition (no more than two authorized persons).

Malcolm Weiss, Esq.

Timothy Miller, Esq.

Hunton Andrews Kurth LLP

Waste Management

550 S. Hope Street, 20th floor

800 S. Temescal St.

Los Angeles, CA Zip 90071

Corona, CA Zip 92879

☎ (213) 532-2130 Ext.

☎ (832) 707-1466 Ext.

Fax ()

Fax ()

E-mail Mweiss@hunton.com

E-mail Tmille32@wm.com

3. RECLAIM Permit ☐ Yes ☒ No

Title V Permit ☒ Yes ☐ No

Persons with disabilities may request this document in an alternative format by contacting the Clerk of the Board at 909-396-2500 or by e-mail at clerkofboard@aqmd.gov.

If you require disability-related accommodations to facilitate participating in the hearing, contact the Clerk of the Board at least five (5) calendar days prior to the hearing.

[ALL DOCUMENTS FILED WITH CLERK'S OFFICE BECOME PUBLIC RECORD]

4. **GOOD CAUSE:** Explain why your petition was not filed in sufficient time to issue the required public notice. (Required only for Emergency and Interim Variances; see Attachment A, Item 4)

Background. As your Board likely recalls, Petitioner operates three enclosed flares, Flare Nos. 3, 4, and 5, as emission control devices for landfill gas ("LFG") generated by waste decomposition at its El Sobrante Landfill ("Facility"). The LFG combusted in the flares is subject to the 150 ppmv daily average sulfur concentration limit in Rule 431.1(c)(2), Table 1. Each flare is also subject to individual sulfur emission limits stated in the Facility's Permit to Operate ("PTO"). Flares 4 and 5 are currently operating under variances granted in Case Nos. 5139-3 and 5139-7, respectively, which apply to the permitted SOx and total sulfur limits for these two flares and not to Rule 431.1 limits.

Under the Facility's Rule 431.1 Alternative Monitoring Plan ("AMP") incorporated into the PTO and the conditions of the above-referenced variances, Petitioner is required to regularly sample and analyze sulfur concentrations in LFG at the flare inlets, and to report the results to SCAQMD staff. Recent laboratory analyses of LFG samples taken at the Flare 3 and 4 inlets have shown total sulfur concentrations above the Rule 431.1 limit of 150 ppmv limit due to high Dimethyl Sulfide ("DMS") levels.

Specifically, on August 20, 2026, Petitioner received an initial same-day laboratory result reflecting total sulfur concentrations (including DMS) of approximately 155 ppmv and 152 ppmv in LFG samples taken at the Flare 3 and Flare 4 inlets, respectively. When these initial results were received and assessed, Petitioner was not able to determine whether they were isolated events or whether they indicated a violation of the 150 ppmv total sulfur limit in Rule 431.1. Along these lines, subsequent daily sulfur concentration analyses (August 21 through August 25) were below the 150 ppmv limit. These compliant same-day laboratory results were insufficient to allow Petitioner to conclude that it was out of compliance.

Between August 26 and the present date, however, additional laboratory analyses of Flare 3 and 4 inlet LFG indicate sulfur levels in excess of the 150 ppmv concentration limit in Rule 431.1. A graph depicting these results for Flare 3 and Flare 4 samples is provided as **Attachment A**.

Further, as described below, on September 3, 2026 Petitioner submitted an application to SCAQMD for permits needed to construct and operate an innovative and unique treatment system which will address the sulfur issues at El Sobrante Landfill.

Discussion. Based upon these post-August 26 results, and after discussions with District Counsel, Petitioner determined that it is in violation of the Rule 431.1(c)(2) sulfur concentration limit (150 ppmv) for LFG sampled at the Flare 3 and 4 inlets. Petitioner also has concluded that it is or will be in violation of the Flare 3 SOx limits in Condition 23 of Permit No. R-G64400 (incorporated into the PTO), which are 6.41 lbs/hour (as SO₂) and 4,679 lbs/month, and related PTO conditions.

Good cause exists for the Hearing Board to grant an interim variance from these Rule 431.1 and PTO limits in the absence of notice to the public (based upon the Hearing Board's "Good Cause" Guidelines) because:

- **Petitioner is or will be in violation of a District rule or permit condition.** At the time of this filing, Petitioner is in violation of the 150 ppmv sulfur concentration limit in Rule 431.1(c)(2) applicable to Flares 3 and 4. Petitioner also believes that it is currently or will be in violation of the Flare 3 SOx limits in its PTO, based upon a calculation of SOx emissions from Flare 3 using the

sulfur concentrations measured in recent LFG samples. Petitioner also believes that it is in violation of related PTO conditions, as explained in this petition.

- **The circumstances leading to these violations could not reasonably have been avoided by Petitioner or anticipated in sufficient time to provide public notice of the variance hearing.**
 - The sulfur exceedances causing the current violations could not reasonably have been avoided by Petitioner. Increasing concentrations of DMS in the LFG at the Facility are causing these exceedances. And as this Hearing Board has previously acknowledged, “[t]here is no method to physically reduce the DMS component of SOx emissions, and the landfill cannot curtail operations.” See Findings and Decision and Order Granting a Regular Variance, Case No. 5139-3 (Nov. 20, 2024), p. 3.
 - Nor could the recent exceedances (>150 ppmv) have reasonably been anticipated in sufficient time to provide public notice for this interim variance request. That said, public notice will be provided for the requested regular variance hearing. As stated above, Petitioner became aware recently, based on same-day sample results, that LFG sulfur concentrations were approaching the Rule 431.1(c)(2) limit and potentially causing exceedances of the Flare 3 mass SOx limits in Petitioner’s PTO. Since becoming aware of the situation and increased total sulfur levels, Petitioner has acted diligently and conscientiously to manage sulfur levels across all three flares, communicate with District Counsel, and prepare this variance petition.
- **Petitioner exercised diligence in petitioning for the interim variance and scheduling the interim variance hearing.** Petitioner received sufficient sulfur data to identify the need for relief from the Rule 431.1 limit on or about September 10, 2026. At that time, laboratory analysis of Flare 3 and 4 inlet samples indicated consistent total sulfur concentrations greater than 150 ppmv, despite Petitioner making adjustments to combine LFG flows to the flares from different areas of the Facility in an effort to reduce these concentrations. Petitioner filed this Petition on September 16, 2026. This was as soon as feasible, given the time required to prepare the petition, to confirm relevant technical details, and to work with District Counsel, staff, and the Hearing Board Clerk’s Office to schedule an interim variance hearing. Petitioner has thus exercised all reasonable diligence in determining the need for the variance and submitting this Petition.
- **Denial of the variance will result in adverse impacts.** Denial of the requested variance would result in adverse impacts to public health or welfare and to Petitioner. If the variance is denied, Petitioner will be out of compliance through no fault of its own and would likely be subject to enforcement for violations of District rules and permit conditions. As a regional waste disposal facility with LFG control operations, Petitioner is an essential public service per SCAQMD Rule 1302(m)(7). Increased costs related to the payment of District-imposed fines and penalties would be passed on to public users of the landfill in the form of increased waste disposal costs. Petitioner itself would be subject to significant enforcement exposure. This would have an unreasonable adverse impact on the Facility’s operations, given that the DMS increases causing the violations are, at this time, beyond Petitioner’s reasonable control, and it is working diligently to address and resolve the issue.

5. Briefly describe the type of business and processes at your facility.

El Sobrante Landfill, an essential public service per SCAQMD Rule 1302(m)(7), is a regional facility that provides safe and convenient disposal services for communities, businesses, and industries in Southern California. Its footprint is 1,322 acres, of which 688 acres are wildlife preserve. The Facility opened in 1986.

6. List the equipment and/or activity(s) that are the subject of this petition (see Attachment A, Item 6, Example #1). **Attach copies of the Permit(s) to Construct and/or Permit(s) to Operate for the subject equipment. For RECLAIM or Title V facilities, attach *only* the relevant sections of the Facility Permit showing the equipment or process and conditions that are subject to this petition. You must bring the entire Facility Permit to the hearing.**

Equipment/Activity	Application/ Permit No.	RECLAIM Device No.	Date Application/Plan Denied (if relevant)*
Flare 3 (John Zink)	616852 / R-G64400 (see Attachment B)	N/A	N/A
Flare 4 (John Zink)*	618396 / R-G64402 (see Attachment B)	N/A	N/A

* Petitioner is not requesting modified variance coverage for Flare 5 in this petition.

7. Briefly describe the activity or equipment, and why it is necessary to the operation of your business. A schematic or diagram may be attached, in addition to the descriptive text.

The flares are part of an LFG flaring system that is used to control LFG emissions generated by the waste decomposition processes at the Facility. Generally speaking, the system involves LFG piping, blowers to move the gas, and flares to control emissions. See **Attachment C** for a process diagram. The flares are required by the PTO and applicable rules.

8. Is there a regular maintenance and/or inspection schedule for this equipment? Yes ☒ No ☐

If yes, how often: Weekly Date of last maintenance and/or inspection: September 11, 2026.

Describe the maintenance and/or inspection that was performed.

Flare maintenance and inspection activities include:

- Weekly inspections with a checklist
- Quarterly blower inspections
- Annual flare cleaning and inspection

9. List all South Coast AQMD rules, and/or permit conditions [indicating the specific section(s) and subsection(s)] from which you are seeking variance relief (if requesting variance from Rule 401 or permit condition, see Attachment A). Briefly explain how you are or will be in violation of each rule or condition (see Attachment A, Item 9, Example #2).

Rule	Explanation
Rule 431.1(c)(2), Table 1	Rule 431.1(c)(2) prohibits the burning of LFG containing sulfur compounds (calculated as H ₂ S) in excess of the 150 ppmv daily average in Table 1. Due to recent same-day reported sulfur concentrations in LFG samples taken from the Flare 3 and Flare 4 inlets, Petitioner cannot operate Flares 3 and 4 in accordance with Rule 431.1(c)(2).*
	* Petitioner is not requesting modified variance coverage for Flare 5. As required under the existing Flare 4 and 5 variance conditions, Petitioner has used Flare 3 to the maximum extent feasible (and limited use of the other flares), which has helped to ensure compliance with inlet sulfur concentration limits applicable to Flare 5.
PTO (Facility-Wide) Condition # 4	Similar to Rule 431.1, Facility-Wide Permit Condition # 4 prohibits use of LFG containing sulfur compounds (calculated as H ₂ S) in excess of 150 ppmv averaged daily.
PTO (Flare 3) Condition # 23	Under Condition # 23 of Flare 3 Permit No. R-G64400, SO _x emissions are limited to 6.41 lbs/hour as SO ₂ and 4,679 lbs/month. Petitioner cannot operate Flare 3 in accordance with Condition # 23.
Rule 203(b)	Rule 203(b) says equipment cannot be operated contrary to conditions in the applicable PTO. Petitioner cannot operate in accordance with Facility-Wide Condition # 4 or the sulfur limits in Condition # 23 (for Flare 3).
Rule 3002(c)(1)	Rule 3002(c)(1) provides that all equipment located at a Title V facility must be operated at all times in compliance with all terms, requirements, and conditions of the Permit. Petitioner cannot operate in accordance with Facility-Wide Condition # 4 or the sulfur limits in Condition # 23 (for Flare 3).

10. Are the equipment or activities subject to this request currently under variance coverage? Yes ☒ No ☐

Case No.	Date of Action	Final Compliance Date	Explanation
5139-3 (Flare # 4)	August 6, 2024 (interim variance), October 3, (2024 (regular variance), July 16, 2025, and July 14, 2026 (variance modifications on consent)	August 5, 2027 or the date that SCAQMD takes final action on A/N 655059 to establish modified total sulfur/SO _x limits that Petitioner can comply with, as demonstrated by Facility data, whichever comes first.	The Hearing Board granted interim and regular variances and subsequent modifications for permitted sulfur limits for Flare 4. However, the variance in Case No. 5139-3 does not provide variance relief from the 150 ppmv sulfur limit in Rule 431.1.*
			* Flare 3 is not currently under variance.

11. Are any other equipment or activities at this location currently (or within the last six months) under variance coverage? Yes ☒ No ☐

Case No.	Date of Action	Final Compliance Date	Explanation
5139-7 (Flare # 5)	November 18, 2025 (regular variance)	November 17, 2026 or the date that SCAQMD takes final action on A/N 647970 to establish modified total sulfur/SO _x limits that Petitioner can comply with, as demonstrated by Facility data, whichever comes first.	The Hearing Board granted a regular variance for permitted sulfur limits for Flare 5.

12. Were you issued any Notice(s) of Violation or Notice(s) to Comply concerning this equipment or activity within the past year? Yes ☐ No ☒

13. Have you received any complaints from the public regarding the operation of the subject equipment or activity within the last six months? Yes ☒ No ☐

If yes, you should be prepared to present details at the hearing.

14. Explain why it is beyond your reasonable control to comply with the rule(s) and/or permit condition(s). Provide specific event(s) and date(s) of occurrence(s), if applicable.

It is beyond Petitioner's reasonable control to comply with the above-listed rules and permit conditions because there is currently no commercially available treatment system that can reduce DMS in LFG.

DMS is not susceptible to removal through the Facility's carbon absorption filter system, which is used to effectively control other the sulfur compounds in LFG prior to combustion. And because the Facility provides an essential public service, Petitioner is not able to curtail operations nor reduce the amount of existing waste at the Facility that is the source of the DMS at issue.

In part as a response to the Hearing Board's and the District's input, on September 3, 2026, Petitioner submitted an application to SCAQMD for permits needed to construct and operate an innovative treatment system intended to address the sulfur issues at the El Sobrante Landfill. Once operational, the treatment system is intended to remove sulfur compounds from the high-sulfur LFG gas streams at the Facility before they are emitted. This new treatment system is designed to control the high DMS concentrations in the Facility's LFG and to return the Facility to compliance with applicable sulfur limits.

Petitioner has met on several occasions with SCAQMD staff over the past year to detail this new treatment system concept and to receive staff's input. The novel part of the proposed system is its application in the LFG context, but the components are not new and Petitioner's assessment is that once operational it will solve the sulfur issues at the Facility.

Petitioner and the District understand it will take time to permit the proposed treatment system. However, in the interim there is an immediate need to continue operating the flares to control existing LFG being generated by and collected at the Facility. The imminent need to operate the flares, however, remains and since the new treatment system needs to be permitted and installed, compliance is currently beyond Petitioner's reasonable control.

15. When and how did you first become aware that you would not be in compliance with the rule(s) and/or permit condition(s)? Provide specific event(s) and date(s) of occurrence(s).

See response to Question 4 above.

Relevant events and dates are as follows:

August 20, 2026: Petitioner received same-day lab analysis of LFG samples taken from the Flare 3 and 4 inlets, indicating total sulfur concentrations over the 150 ppmv limit in Rule 431.1(c)(2) (approximately 155 ppmv for Flare 3 and 152 ppmv for Flare 4).

August 21 - 25, 2026: Same-day turnaround lab analysis of LFG samples taken daily from the Flare 3 and 4 inlets indicated total sulfur concentrations *below* the Rule

431.1(c)(2) limit.

August 26 - September 14, 2026: Same-day turnaround lab analysis of LFG samples taken daily from the Flare 3 and 4 inlets indicated total sulfur concentrations above the Rule 431.1(c)(2) limit (ranging from 150.98 ppmv to 168.02 ppmv) for most of the days during this period.

September 16, 2026: Petitioner filed this variance request.

16. List date(s) and action(s) you have taken since that time to achieve compliance. That the Petition Form HB-V, and any related instructions, include requirement that the Petitioner include a timeline in suitable, chronological format to address the events, dates, and actions called for by Questions 15 and 16, including the dates of communication with the South Coast AQMD to notify them of the occurrence(s) giving rise to the requested variance.

The above-mentioned lab results were reported to South Coast AQMD staff in accordance with the conditions of the variances granted in Case Nos. 5139-3 and 5139-7. On September 4, 11, and 15 2026, Petitioner's counsel met telephonically with the District's Counsel to discuss the reported sulfur results and the potential need for a variance.

Also during this time period, Petitioner assessed a possible violation of Rule 431.1 and related PTO requirements and confirmed it is or will be in violation on or about September 10, 2026. Since then, Petitioner has been focused on managing sulfur levels across all three flares, discussing the issues with the District, and preparing this petition.

Attachment D is a timeline that includes the key events called for by Questions 15 and 16.

17. What would be the harm to your business during **and/or after** the period of the variance if the variance were not granted?

Economic losses: \$ _____ See below _____

Number of employees laid off (if any): _____

Provide detailed information regarding economic losses, if any, (anticipated business closure, breach of contracts, hardship on customers, layoffs, and/or similar impacts).

If the requested variance is not granted, harm to the business identified so far would include penalties imposed by SCAQMD for violations of the above-referenced District rules and PTO conditions. Because it is an essential public service, the Facility must continue operating to meet obligations for managing public waste.

18. Can you curtail or terminate operations in lieu of, or in addition to, obtaining a variance? Please explain.

No. The DMS causing exceedances of the sulfur limits in the District's rules and the Facility's PTO is a by-product of LFG generated by waste that Petitioner estimates was landfilled prior to 2005. Because Petitioner manages municipal solid waste, the Facility provides an essential public service and cannot curtail or terminate operations (such curtailment of operations would not, in any event, mitigate the emissions at issue, as they are a product of the decomposition of existing waste at the landfill). Further, the flares at the Facility are necessary and required to control LFG generated by waste decomposition.

19. Estimate excess emissions, if any, on a daily basis, including, if applicable, excess opacity (the percentage of total opacity above 20% during the variance period). If the variance will result in no excess emissions, insert "N/A" here and skip to No. 20.

Pollutant	(A)	(B)	(C)*
	Total Estimated Excess Emissions (lbs/day)	Reduction Due to Mitigation (lbs/day)	Net Emissions After Mitigation (lbs/day)
SOx	(To be provided at a later date)		

* Column A minus Column B = Column C

Excess Opacity: N/A %

20. Show calculations used to estimate quantities in No. 19, or explain why there will be no excess emissions.

To be provided at a later date.

21. Explain how you plan to reduce (mitigate) excess emissions during the variance period to the maximum extent feasible, or why reductions are not feasible.

See responses to Questions 14, 16, and 18 above.

22. How do you plan to monitor or quantify emission levels from the equipment or activity(s) during the variance period, and to make such records available to the District? **Any proposed monitoring does not relieve RECLAIM facilities from applicable missing data requirements.**

Petitioner will continue to sample and analyze LFG samples taken at the flare inlets, and report the results to the District, as required under applicable variance, PTO, and rule requirements.

23. How do you intend to achieve compliance with the rule(s) and/or permit condition(s)? Include a detailed description of any equipment to be installed, modifications or process changes to be made, permit conditions to be amended, etc., dates by which the actions will be completed, and an estimate of total costs.

Petitioner intends to achieve compliance once the treatment system described above (in response to Question 14) is installed and is working as anticipated. Petitioner submitted an application to the District to permit the treatment system on September 3, 2026, and the application is currently under review. The total cost of building and installing the treatment system is estimated to be in the range of \$5,000,000 to \$10,000,000, excluding ongoing operational costs. Petitioner also paid more than \$35,000 in processing fees to SCAQMD for review of its application.

See response to Question 24 for a more robust timeline of dates by which actions related to this system will be completed.

24. State the date you are requesting the variance to begin:

- As of the date the requested interim variance is granted.

and the date by which you expect to achieve final compliance:

- On the date that the treatment system has completed successful startup.

If the regular variance is to extend beyond one year, you **must** include a **Schedule of Increments of Progress**, specifying dates or time increments for steps needed to achieve compliance. See District Rule 102 for definition of Increments of Progress (see Attachment A, Item 24, Example #3).

List Increments of Progress here:

- Six (6) months after treatment system permit issuance by SCAQMD:
 - Detailed treatment system design.
 - Civil and mechanical design.
- Eighteen (18) months after treatment system permit issuance by SCAQMD:
 - Treatment system equipment fabrication.
 - Grading and foundation work.
- Nineteen (19) months after treatment system permit issuance by SCAQMD:
 - Gas collection and control system piping bifurcation modifications implemented.
- Twenty-four (24) months after treatment system permit issuance by SCAQMD:
 - Treatment system installation.
 - Treatment system startup.
- Thirty-two (32) months after treatment system permit issuance by SCAQMD:
 - Initial treatment system source testing

25. List the names of any District personnel with whom facility representatives have had contact concerning this variance petition or any related Notice of Violation or Notice to Comply.

Mary Reichert, Senior Deputy District Counsel

Ext. 2575

If the petition was completed by someone other than the petitioner, please provide their name and title below.

Malcolm C. Weiss

Hunton Andrews Kurth LLC

Attorney

The undersigned, under penalty of perjury, states that the above petition, including attachments and the items therein set forth, is true and correct.

Executed on 9/16/2026

at Corona

California

Signature



David Meyer

Print Name

Title: Senior District Manager

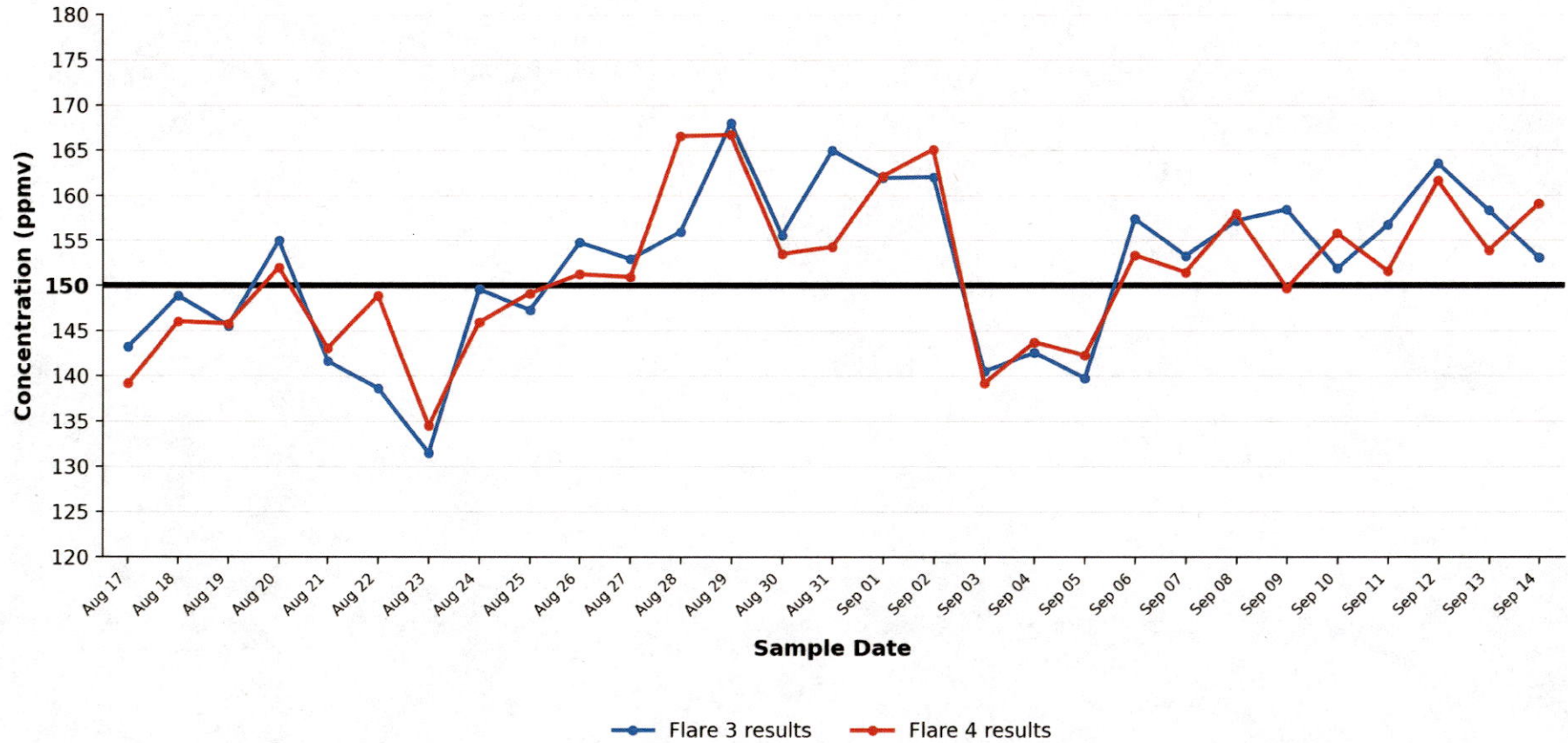
ATTACHMENT A
Petition for Variance
(Case No. 5139-8)

USA Waste of California, Inc. dba El Sobrante Landfill

TRS Concentration Results: Flare 3 and Flare 4

TRS by SCAQMD Method 307-91 | August 17, 2026–September 14, 2026

TRS Concentrations by Sample Date



ATTACHMENT B
Petition for Variance
(Case No. 5139-8)

USA Waste of California, Inc. dba El Sobrante Landfill



South Coast Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178

Title Page	
Facility ID:	113674
Revision #:	21
Date:	June 18, 2025

FACILITY PERMIT TO OPERATE

**USA WASTE OF CAL (EL SOBRANTE LANDFILL)
10910 DAWSON CANYON RD
CORONA, CA 92883**

NOTICE

IN ACCORDANCE WITH RULE 206, THIS PERMIT TO OPERATE OR A COPY THEREOF MUST BE KEPT AT THE LOCATION FOR WHICH IT IS ISSUED.

THIS PERMIT DOES NOT AUTHORIZE THE EMISSION OF AIR CONTAMINANTS IN EXCESS OF THOSE ALLOWED BY DIVISION 26 OF THE HEALTH AND SAFETY CODE OF THE STATE OF CALIFORNIA OR THE RULES OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT. THIS PERMIT SHALL NOT BE CONSTRUED AS PERMISSION TO VIOLATE EXISTING LAWS, ORDINANCES, REGULATIONS OR STATUTES OF ANY OTHER FEDERAL, STATE OR LOCAL GOVERNMENTAL AGENCIES.

Wayne Nastri
Executive Officer

By 
Jason Aspell
Deputy Executive Officer
Engineering and Permitting



South Coast Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178

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Facility ID: 113674
Revision #: 21
Date: June 18, 2025

**FACILITY PERMIT TO OPERATE
USA WASTE OF CAL (EL SOBRANTE LANDFILL)**

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FACILITY PERMIT TO OPERATE USA WASTE OF CAL (EL SOBRANTE LANDFILL)

SECTION A: FACILITY INFORMATION

LEGAL OWNER &/OR OPERATOR: USA WASTE OF CAL (EL SOBRANTE LANDFILL)
LEGAL OPERATOR (if different than owner):
EQUIPMENT LOCATION: 10910 DAWSON CANYON RD
CORONA, CA 92883
MAILING ADDRESS: 10910 DAWSON CANYON RD
CORONA, CA 92883
RESPONSIBLE OFFICIAL: MICHAEL HAMMER
TITLE: PRESIDENT
TELEPHONE NUMBER: (818) 252-3148
CONTACT PERSON: LINDA LOCKHART
TITLE: EP SPECIALIST
TELEPHONE NUMBER: (951) 277-5109
TITLE V PERMIT ISSUED: November 28, 2017
TITLE V PERMIT EXPIRATION DATE: November 27, 2022

TITLE V		RECLAIM	
YES	NOx:	NO	
	SOx:	NO	
	CYCLE:	0	
	ZONE:	INLAND	



FACILITY PERMIT TO OPERATE
USA WASTE OF CAL (EL SOBRANTE LANDFILL)

FACILITY WIDE CONDITION(S)

Condition(s):

1. Except for open abrasive blasting operations, the operator shall not discharge into the atmosphere from any single source of emissions whatsoever any air contaminant for a period or periods aggregating more than three minutes in any one hour which is:
 - A. As dark or darker in shade as that designated No. 1 on the Ringelmann Chart, as published by the United States Bureau of Mines; or
 - B. Of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described in subparagraph (A) of this condition.
[Rule 401]
2. The operator shall not purchase any diesel fuel for stationary source application in the South Coast AQMD, unless the fuel is low sulfur diesel for which the sulfur content shall not exceed 15 ppm by weight as supplied by the supplier.
[Rule 431.2]
3. The operator shall not burn fuel oil containing sulfur compounds in excess of 0.05 percent by weight.
[Rule 431.2]
4. The operator shall not use landfill gas containing sulfur compounds in excess of 150 ppmv calculated as hydrogen sulfide averaged daily or as specified in an approved Rule 431.1 alternative monitoring plan.
[Rule 431.1]
5. All recording devices shall be synchronized with respect to the time of day.
[Rule 204]
6. Continuous operation of monitoring systems not subject to Rule 218, Rule 218.1, Rule 218.2, or Rule 218.3 are not required when the associated basic equipment is not in operation, or when necessary calibration, maintenance, or repair activities are performed in accordance with manufacturer's recommendation. The operator shall take all reasonable actions to minimize the time required to perform such activities. In no event shall any such activities exceed ninety-six (96) consecutive hours for any one calibration, maintenance, or repair activity. The operator shall notify the South Coast AQMD within twenty-four (24) hours of the start of a calibration, maintenance, or repair activity, if the activity is expected to last more than 24 consecutive hours.
[Rule 204]
7. The owner or operator of a MSW landfill shall comply with the following unless otherwise approved in a valid Rule 1150.1 Compliance Plan:
 - A. Install and operate a wind speed and direction monitoring system with a continuous recorder. For wind speed, use a 3 cup assembly with a range of 0 to 50 miles an hour, with a threshold of 0.75 mile per hour or less. For wind direction, use a vane with a range of 0 to 540 degrees azimuth, with a threshold of plus-minus 2 degrees. An approved alternative shall be permitted to be used in lieu of the above.
 - B. Monitor and collect monthly, or as per the approved 1150.1 alternative, samples for analysis of TOC and TAC from the subsurface refuse boundary sampling probes.



**FACILITY PERMIT TO OPERATE
USA WASTE OF CAL (EL SOBRANTE LANDFILL)**

PERMIT TO CONSTRUCT/OPERATE

**Permit No. R-G64400
A/N 616852**

Equipment Description:

Modification of Landfill Gas Flaring System (under Permit to Operate G29217) consisting of:

1. Knockout vessel/gas filter, Endustra, 2'-6" Dia. by 6'-1" H., 5,500 cfm capacity.
2. Shutoff valves.
3. Two (2) blowers, Houston Service Industries, Model 14104, each 200 HP, 5,500 scfm variable frequency drive.
4. Flare (No. 3), John Zink, Model Zule, 167.15 MMBtu/hr (HHV), 13' Dia. by 60' H., automatic air damper, propane pilot, 100 HP combustion air blower, four source test ports.

By replacement of:

1. Item No. 1 with: Knockout vessel/gas filter, Endustra, Black HDPE, 5'3" Dia. by 12'-5" H., 5,500 scfm capacity.
2. Item No. 3 with: Gas blower skid with up to three (3) LFG Blowers, each 300 HP 5,500 scfm variable frequency drive, common to Flare No. 4.
3. Combustion air blower under Item No. 4 with: 250 HP combustion air blower.

Conditions:

1. Operation of this equipment shall be conducted in accordance with all data and specifications submitted with the application under which this permit is issued unless otherwise noted below.
[Rule 204]
2. This equipment shall be properly maintained and kept in good operating condition at all times.
[Rule 204]
3. This equipment shall be operated and maintained by personnel properly trained in its operation.
[Rule 204]
4. Four (4) sampling ports shall be provided in the flare stack at least five (5) feet upstream of the flare outlet. Each sampling port shall consist of a four inch coupling. All ports shall be properly centered. An equivalent method of emission sampling may be used upon approval of the Executive Officer, adequate and safe access to all test ports shall be provided.
[Rule 217]
5. A sampling port shall be maintained at the inlet gas line to the flare(s) to allow the collection of landfill gas samples.
[Rule 217, Rule 431.1, Rule 1150.1]



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6. The flare shall be equipped with a temperature indicator and recorder which measures and records the gas temperature in the flare stack. The temperature indicator and recorder shall operate whenever the flare is in operation. The temperature shall be measured at a location above the flame zone at least 0.6 seconds downstream of the burner and not less than five (5) feet from the top of the stack.
[Rule 1303(a)(1)-BACT]

7. Whenever the flare is in operation, a temperature of not less than 1400 degrees Fahrenheit, 15 minute average, as measured by the temperature indicator and recorder, shall be maintained except during periods of startup and shutdown. Startup is defined as the period from flare ignition to the time when 1400 degrees Fahrenheit is achieved, not to exceed 30 minutes. Shutdown is the period beginning when the gas valve begins to close and ending when the gas valve completely shuts off, not to exceed 30 minutes.
[Rule 1303(a)(1)-BACT]

8. The operator shall operate and maintain this equipment according to the following requirements:

The exhaust temperature, for the flare, shall be maintained at a minimum 1400 degrees Fahrenheit whenever the equipment it serves is in operation.

The continuous exhaust temperature monitoring and recording system shall be pursuant to the operation and maintenance requirements specified in 40 CFR Part 64.7. Such a system shall have an accuracy of within +/-1% of the temperature being monitored and shall be inspected, maintained, and calibrated on an annual basis in accordance with the manufacturer's specifications using an applicable South Coast AQMD or EPA approved method.

For the purpose of this condition, a deviation shall be defined as when a temperature of less than 1400 degrees Fahrenheit occurs during normal operation except during startups and shutdowns, not to exceed 30 minutes per event. The exhaust temperature shall be averaged over a 15 minute period, and an hourly average shall be computed from such data points. The operator shall review the records of temperature on a daily basis to determine if a deviation has occurred or shall install an alarm system to alert the operator when a deviation occurs.

For each semi-annual reporting period specified in Condition No. 23 in Section K, whenever a deviation occurs from 1400 degrees Fahrenheit, the operator shall take immediate corrective action, and keep records of the duration and cause (including unknown cause, if applicable) of the deviation and the corrective action taken.

All deviations shall be reported to the South Coast AQMD on a semi-annual basis pursuant to the requirements specified in 40 CFR Part 64.9 and Condition Nos. 22 and 23 in Section K of this permit.

The operator shall submit an application with a Quality Improvement Plan (QIP) in accordance with 40 CFR Part 64.8 to the South Coast AQMD if an accumulation of deviations exceeds 5 percent duration of this equipment's total operating time for any semi-annual reporting period specified in Condition No. 23 in Section K of this permit. The required QIP shall be submitted to the South Coast AQMD within 90 calendar days after the due date for the semi-annual monitoring report.

The operator shall keep adequate records in a format that is acceptable to the South Coast AQMD to demonstrate compliance with all applicable requirements specified in this condition and 40 CFR Part 64.9 for a minimum of five years.

[40 CFR 64]



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9. The flare shall be equipped with an automatic shutdown system with a failure alarm, which has been approved by South Coast AQMD, to automatically isolate the flare from the landfill gas supply line, shut off the blowers and immediately notify a responsible party of the shutdown.
[Rule 1303(a)(1)-BACT]
10. The automatic shutdown safety system shall be tested at least annually for proper operation and the results recorded.
[Rule 1303(a)(1)-BACT]
11. A flow indicating and recording device shall be installed in the landfill gas supply line to the flare to measure and record the quantity of landfill gas in standard cubic feet per minute (scfm) being burned in the flare.
[Rule 1303(b)(2)-Offset]
12. The volume of landfill gas burned in Flare No. 3 shall not exceed 6,325 scfm.
[Rule 1303(b)(2)-Offset]
13. The heat input through Flare No. 3 shall not exceed 167.15 mmBTU per hour (HHV).
[Rule 1303(b)(1)-Modeling, Rule 1303(b)(2)-Offset]
14. Weekly readings of the methane content of the gas at the inlet to the flare shall be taken using an instrument approved by South Coast AQMD. All results shall be recorded.
[Rule 1303(b)(2)-Offset]
15. All recording devices shall be synchronized with respect to the time of day.
[Rule 1303(b)(2)-Offset]
16. The flare shall be equipped with a sufficient number of view ports to allow visual inspection of the flame height within the flare at all times. The view ports shall be located at the elevation of the temperature sensor locations. Safe and adequate access shall be provided for all view ports upon request by South Coast AQMD personnel.
[Rule 217, Rule 1303(a)(1)-BACT]
17. The flare shall be operated so that the flame in the flare remains below the height of the flare's operating thermocouple at all times.
[Rule 1303(a)(1)-BACT]
18. The maximum flare skin temperature at any location shall not exceed 250 degrees Fahrenheit.
[Rule 217]
19. The operation of this equipment shall not result in the release of raw landfill gas into the atmosphere. Any breakdowns or malfunction which results in emissions of raw landfill gas shall be reported to the South Coast AQMD within one hour after occurrence, and immediate remedial measures shall be undertaken to correct the problem and prevent further emissions into the atmosphere.
[Rule 402, Rule 430, Rule 1150.1]
20. The owner or operator of this equipment shall conduct annual performance tests in accordance with South Coast AQMD approved test procedures and furnish the South Coast AQMD with written results of such performance tests in accordance with South Coast AQMD Rule 1150.1 requirements. Written notice of the performance tests shall be provided to the South Coast AQMD 10 days prior to the testing so that an observer may be present. All source testing and analytical methods shall be submitted to the South Coast AQMD for approval at least 60 days prior to the testing.



FACILITY PERMIT TO OPERATE USA WASTE OF CAL (EL SOBRANTE LANDFILL)

The tests shall be conducted at the maximum flow rates allowed by this permit, or the maximum flow rates achievable, and shall include, but may not be limited to, a test of the inlet gas to the flare and the flare exhaust for:

- A. Methane.
- B. Total non-methane organics.
- C. Oxides of nitrogen (exhaust only).
- D. Carbon monoxide (exhaust only).
- E. Total particulates (exhaust only).
- F. Hydrogen sulfide (inlet only).
- G. C1 through C3 sulfur compounds (speciated, inlet only).
- H. Carbon dioxide.
- I. Rule 1150.1 Table 1 compounds.
- J. Oxygen.
- K. Nitrogen.
- L. Moisture content.
- M. Temperature.
- N. Flowrate.
- O. NMOC destruction efficiency.

[Rule 1150.1, Rule 1303(a)(1)-BACT, Rule 1303(b)(2)-Offset, Rule 1401, 40 CFR 63 Subpart AAAA]

- 21. This equipment shall be operated in compliance with all the applicable requirements of Rule 1118.1.
[Rule 1118.1]
- 22. All records required to demonstrate compliance shall be kept and maintained for a period of at least five years and shall be made available to South Coast AQMD upon request.
[Rule 204, Rule 1118.1, Rule 1150.1, 40 CFR 63 Subpart AAAA]

Emissions and Requirements:

- 23. This equipment is subject to the applicable requirements of the following rules and regulations:
 - CO: 2000 ppmv, Rule 407
 - CO: 0.06 lbs/mmBTU, Rule 1303(a)(1)-LAER/BACT
 - CO: 10.03 lbs/hr, Rule 1303(b)(2)-Offsets
 - CO: 7322 lbs/month, Rule 1313(g)
 - NOx: 0.025 lbs/mmBTU, Rule 1303(a)(1)-LAER/BACT
 - NOx: 4.18 lbs/hr, as NO₂, Rule 1303(b)(2)-Offsets
 - NOx: 3051 lbs/month, Rule 1313(g)
 - PM: Rule 404, See Appendix B for emission limits
 - PM: 0.1 gr/scf, Rule 409
 - PM10: 3.41 lbs/hr, Rule 1303(b)(2)-Offsets
 - PM10: 2489 lbs/month, Rule 1313(g)
 - NMOC: 20 ppmv or 98 weight percent reduction, Rule 1150.1, 40 CFR 63 Subpart AAAA
 - TNMOC: 6.57 lbs/hr, as CH₄, Rule 1303(b)(2)-Offsets
 - TNMOC: 4796 lbs/month, Rule 1313(g)
 - SOx: 6.41 lbs/hr, as SO₂, Rule 1303(b)(2)-Offsets
 - SOx: 4679 lbs/month, Rule 1313(g)

This Permit to Construct/Operate R-G64400 supersedes Permit to Operate R-G64400 issued April 27, 2021.



**FACILITY PERMIT TO OPERATE
USA WASTE OF CAL (EL SOBRANTE LANDFILL)**

PERMIT TO CONSTRUCT/OPERATE

Permit No. R-G64402
A/N 618396

Equipment Description:

Landfill Gas Flaring System consisting of:

1. Knockout vessel/gas filter with mist eliminator.
2. Autoblock shutoff valves.
3. Actuated valve to control LFG flow between flares.
4. Gas blower skid with up to three (3) LFG Blowers, each 300 HP 5,500 SCFM variable frequency drive, common to Flare No. 3.
5. Flare (No. 4), John Zink, Model 13' X 60' Zule LF, 167.15 MMBtu/hr (HHV), 12'-8" ID. by 60'-0" H., automatic air damper, propane pilot, 250 HP combustion air blower, four source test ports.

Conditions:

1. Construction and operation of this equipment shall be conducted in accordance with all data and specifications submitted with the application under which this permit is issued unless otherwise noted below.
[Rule 204]
2. This equipment shall be properly maintained and kept in good operating condition at all times.
[Rule 204]
3. This equipment shall be operated and maintained by personnel properly trained in its operation.
[Rule 204]
4. A set of four sampling ports shall be provided in the flare stack at least five feet upstream of the flare outlet. Each sampling port shall consist of a four inch coupling. All ports shall be properly centered. An equivalent method of emission sampling may be used upon approval of the Executive Officer, adequate and safe access to all test ports shall be provided.
[Rule 217]
5. A sampling port shall be maintained at the inlet gas line to the flare to allow the collection of landfill gas samples.
[Rule 217, Rule 431.1, Rule 1150.1]
6. The flare shall be equipped with a temperature indicator and recorder which measures and records the gas temperature in the flare stack. The temperature indicator and recorder shall operate whenever the flare is in operation. The temperature shall be measured at a location above the flame zone at least 0.6 seconds downstream of the burner and not less than five feet from the top of the stack.



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- [Rule 1303(a)(1)-BACT]
7. Whenever the flare is in operation, a temperature of not less than 1400 degrees Fahrenheit, 15 minute average, as measured by the temperature indicator and recorder, shall be maintained except during periods of startup and shutdown. Startup is defined as the period from flare ignition to the time when 1400 degrees Fahrenheit is achieved, not to exceed 30 minutes. Shutdown is the period beginning when the gas valve begins to close and ending when the gas valve completely shuts off, not to exceed 30 minutes.
- [Rule 1303(a)(1)-BACT]

8. The operator shall operate and maintain this equipment according to the following requirements:

The exhaust temperature for the flare shall be maintained at a minimum 1400 degrees Fahrenheit whenever the equipment is in operation.

The continuous exhaust temperature monitoring and recording system shall be pursuant to the operating and maintenance requirements specified in the 40 CFR Part 64.7. Such a system shall have an accuracy of within +/- 1% of the temperature being monitored and shall be inspected, maintained, and calibrated on an annual basis in accordance with the manufacturer's specifications using an applicable South Coast AQMD approved method.

For the purpose of this condition, a deviation shall be defined as when a temperature of less than 1400 degrees Fahrenheit occurs during normal operation except during startups and shutdowns, not to exceed 30 minutes per event. Exhaust temperature shall be averaged over a 15 minute period, and hourly average shall be computed from such data points. The operator shall review the records of temperature on a daily basis to determine if a deviation has occurred or shall install an alarm system to alert the operator when a deviation occurs.

For each semi-annual reporting period specified in condition No. 23 in Section K, whenever a deviation occurs from 1400 degrees Fahrenheit, the operator shall take immediate corrective action and keep records of the duration and cause (including unknown cause, if applicable) of the deviation and the corrective action taken.

All deviations shall be reported to the South Coast AQMD on a semi-annual basis pursuant to the requirements specified in 40 CFR Part 64.9 and Condition Nos. 22 and 23 in Section K of this permit.

The operator shall submit an application with a Quality Improvement Plan (QIP) in accordance with 40 CFR Part 64.8 to the South Coast AQMD if an accumulation of deviations exceeds five percent duration of this equipment's total operating time for any semi-annual reporting period specified in Condition No. 23 in Section K of this permit. The required QIP shall be submitted to the South Coast AQMD within 90 calendar days after the due date for the semi-annual monitoring report.

The operator shall keep adequate records in a format that is acceptable to the South Coast AQMD to demonstrate compliance with all applicable requirements specified in this condition and 40 CFR Part 64.9 for a minimum of five years.

[40 CFR 64]



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9. The flare shall be equipped with an automatic shut down system with a failure alarm, which has been approved by South Coast AQMD, to automatically isolate the flare from the landfill gas supply line, shut off the blowers and immediately notify a responsible party of the shut down.
[Rule 1303(a)(1)-BACT]
10. The automatic shutdown safety system shall be tested at least annually for proper operation and the results recorded.
[Rule 1303(a)(1)-BACT]
11. A flow indicating and recording device shall be installed in the landfill gas supply line to the flare to measure and record the quantity of landfill gas in standard cubic feet per minute (scfm) being burned in the flare.
[Rule 1303(b)(2)-Offset]
12. The volume of landfill gas burned in Flare No. 4 shall not exceed 6,325 scfm.
[Rule 1303(b)(2)-Offset]
13. The heat input through Flare No. 4 shall not exceed 167.15 million BTU per hour (HHV).
[Rule 1303(b)(1)-Modeling, Rule 1303(b)(2)-Offset]
14. Weekly readings of the methane content of the gas at the inlet to the flare shall be taken using an instrument approved by South Coast AQMD. All results shall be recorded.
[Rule 1303(b)(2)-Offset]
15. All recording devices shall be synchronized with respect to the time of day.
[Rule 1303(b)(2)-Offset]
16. The flare shall be equipped with a sufficient number of view ports to allow visual inspection of the flame height within the flare at all times. The view ports shall be located at the elevation of the temperature sensor locations. Safe and adequate access shall be provided for all view ports upon request by South Coast AQMD personnel.
[Rule 217, Rule 1303(a)(1)-BACT]
17. The flare shall be operated so that the flame in the flare remains below the height of the flare's operating thermocouple at all times.
[Rule 1303(a)(1)-BACT]
18. The maximum flare skin temperature at any location shall not exceed 250 degrees Fahrenheit.
[Rule 217]
19. The operation of this equipment shall not result in the release of raw landfill gas into the atmosphere. Any breakdowns or malfunctions which results in emissions of raw landfill gas shall be reported to the South Coast AQMD within one hour after occurrence, and immediate remedial measure shall be undertaken to correct the problem and prevent further emissions into the atmosphere.
[Rule 402, Rule 430, Rule 1150.1]



FACILITY PERMIT TO OPERATE
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20. The operator shall conduct an initial source test of the flare within 60 days after the flare is completely operational but not later than 180 days after initial startup and shall conduct subsequent annual source tests, in accordance with South Coast AQMD approved source test procedures and South Coast AQMD Rule 1150.1 requirements, unless otherwise approved by South Coast AQMD. A source test protocol shall be submitted to South Coast AQMD for approval at least 30 days prior to the scheduled initial source test. All source testing shall be conducted in accordance with a valid South Coast AQMD approved source test protocol and approved test procedures. Written notification of the scheduled test date shall be provided to South Coast AQMD at least seven (7) days prior to the date of testing so that the testing may be observed by South Coast AQMD personnel. The owner or operator shall furnish to the South Coast AQMD the written results of such performance tests in accordance with South Coast AQMD Rule 1150.1 requirements and no later than 45 days of the completion of the source test.

The source tests shall be conducted at the maximum flow rates allowed by this permit, or the maximum flow rates achievable, and shall include, but may not be limited to, a test of the inlet gas to the flare and the flare exhaust for:

- A. Methane.
- B. Total non-methane organics.
- C. Oxides of nitrogen (exhaust only).
- D. Carbon monoxide (exhaust only).
- E. Total particulates (exhaust only).
- F. Hydrogen sulfide (inlet only).
- G. C1 through C3 sulfur compounds (speciated, inlet only).
- H. Carbon dioxide.
- I. Rule 1150.1 Table 1 compounds.
- J. Oxygen.
- K. Nitrogen.
- L. Moisture content.
- M. Temperature.
- N. Flowrate.
- O. NMOC destruction efficiency.

[Rule 1150.1, Rule 1303(a)(1)-BACT, Rule 1303(b)(2)-Offset, Rule 1401, 40 CFR 63 Subpart AAAA]

21. The source test report, for the flare shall include, but not be limited to:
- A. Emissions of CO, NO_x, TNMOC, methane, and total PM (PM₁₀), reported in units of lbs/hr and ppmv (except particulates/PM₁₀ which shall be in lbs/hr and gr/scf), overall TNMOC & methane destruction efficiency (wt%), speciated organic emissions (lbs/hr and ppmv), oxygen and carbon dioxide (volume%), total sulfur compounds as H₂S (lbs/hr and ppmv), and TNMOC emissions (ppmv dry basis as hexane at 3% oxygen).
 - B. The test shall be performed by a testing laboratory certified to meet the criteria in South Coast AQMD Rule 304(k) (No Conflict of Interest).
 - C. Sampling facilities shall comply with South Coast AQMD "Guidelines for Construction of Sampling and Testing Facilities" pursuant to Rule 217.

[Rule 204, Rule 217, Rule 1150.1, Rule 1303(b)(1)-Modeling, Rule 1303(b)(2)-Offset, Rule 1401]

22. This equipment shall be operated in compliance with all the applicable requirements of Rule 1118.1.
- [Rule 1118.1]



**FACILITY PERMIT TO OPERATE
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23. All collected landfill gas shall be directed to the flare for combustion or to an adequately sized treatment system which has a valid Permit to Operate or does not require a written permit per South Coast AQMD Rule 219. [Rule 1150.1, Rule 1303(a)(1)-BACT]
24. This permit shall expire if construction of this equipment is not complete within one year from the date of issuance of this permit unless an extension is granted by the Executive Officer. [Rule 205]
25. All records required to demonstrate compliance shall be kept and maintained for a period of at least five years and shall be made available to South Coast AQMD upon request. [Rule 204, Rule 1118.1, Rule 1150.1, 40 CFR 63 Subpart AAAA]

Emissions and Requirements:

26. This equipment is subject to the applicable requirements of the following Rules and Regulations:

CO:	2000 ppmv, Rule 407
CO:	0.06 lb/MMBTU, Rule 1118.1, Rule 1303(a)(1)-BACT/LAER
CO:	10.03 lb/hr, Rule 1303(b)(2)-Offsets
CO:	7321.8 lb/month, Rule 1313(g)
NOx:	0.025 lb/MMBTU, Rule 1303(a)(1)-BACT/LAER Rule 1118.1
NOx:	4.18 lb/hr, Rule 1303(b)(2)-Offsets
NOx:	3051.3 lb/month, Rule 1313(g)
PM:	Rule 404, see Appendix B for limits
PM:	0.1 gr/scf, Rule 409
PM10:	5 lbs/MMscf, Rule 1303(a)(1)-BACT/LAER
PM10:	1.90 lb/hr, Rule 1303(b)(2)-Offsets
PM10:	1386.9 lb/month, Rule 1313(g)
NMOC:	20 ppmv or 98% weight reduction, Rule 1150.1, 40 CFR 63 Subpart AAAA
VOC:	0.006 lb/MMBTU, Rule 1303(a)(1)-BACT/LAER
VOC:	1.00 lb/hr, Rule 1303(b)(2)-Offsets
VOC:	729.9 lb/month, Rule 1313(g)
SOx:	60 ppmv (averaged monthly) and 85 ppm (averaged daily) in inlet, total sulfur as H ₂ S, Rule 1303(a)(1)-BACT/LAER
SOx:	3.85 lb/hr, Rule 1303(b)(2)-Offsets
SOx:	2810.4 lb/month, Rule 1313(g)

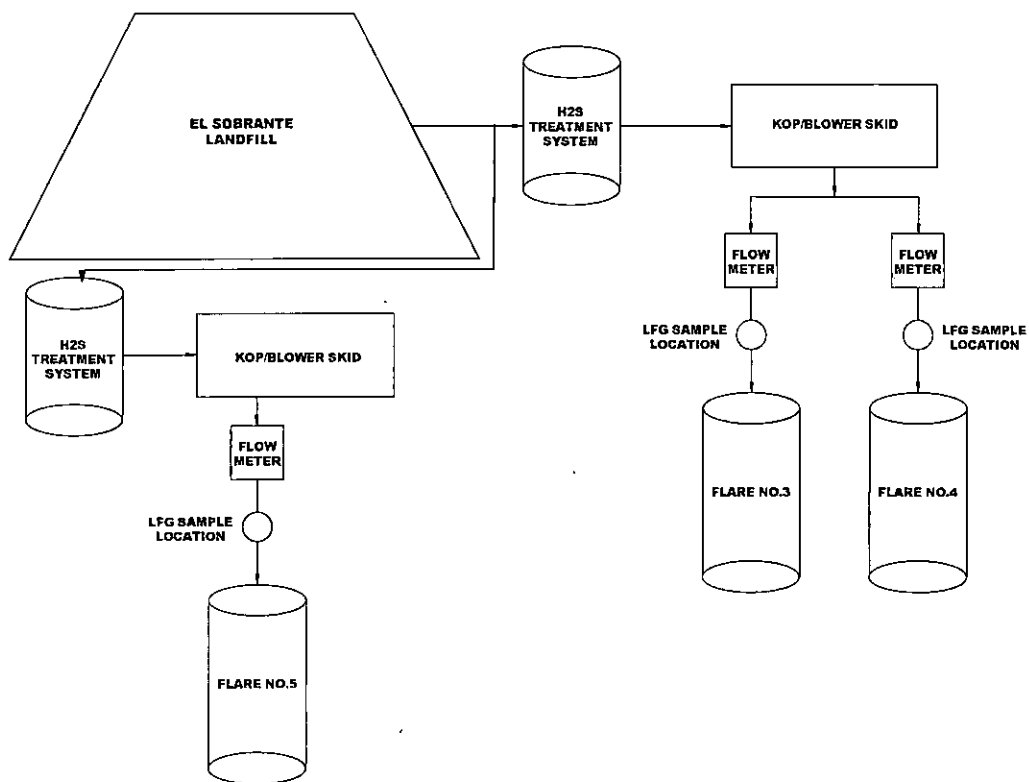
This Permit to Construct/Operate R-G64402 supersedes Permit to Construct/Operate R-G64402 issued April 27, 2021.

ATTACHMENT C

Petition for Variance (Case No. 5139-8)

USA Waste of California, Inc. dba El Sobrante Landfill

Process Diagram



ATTACHMENT D
Petition for Variance
(Case No. 5139-8)

USA Waste of California, Inc. dba El Sobrante Landfill

TIMELINE OF SULFUR SAMPLING RESULTS AND RELATED ACTIONS

August 20, 2026 - September 16, 2026

