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February 14, 2019

Mr. Dan Searcy  
Manager, Compliance Division  
Ventura County Air Pollution Control District  
669 County Square Drive  
Ventura, CA 93003

**SUBJECT: TITLE V COMPLIANCE REPORTS FOR THE OXNARD LANDFILL**

Dear Mr. Searcy:

The Ventura Regional Sanitation District (VRSD) submits the attached Title V compliance reports for the Oxnard Landfill, Title V Permit Number 01399. A copy of this letter has also been submitted to the Air Quality Division of the United States Environmental Protection Agency, Region IX.

This submittal includes the following attachments:

1. Semi-Annual Emissions Guidelines (EG) and Title V Report for July 1, 2018 to December 31, 2018
2. Semi-Annual Startup, Shutdown and Malfunction (SSM) Plan Report for July 1 to December 31, 2018
3. Annual Title V Compliance Certification for January 1 to December 31, 2018
4. Supplemental information historically submitted with Title V Semi-Annual Reports

Attachment 1 includes the Semi-Annual EG report/TV report.

A separate Responsible Official's Certification Form is included in Attachment 2 for the SSM Plan Report. Attachment 2 also includes a summary table of all SSM events and the individual SSM Plan Forms.

Attachment 3 includes the Annual Title V Compliance Certification. Attachment 3 also includes the Permit Attachment Form, Annual Deviation Summary Form, and Flare Source Test Summary Form.

Attachment 4 includes supplemental information that has been historically provided to the Ventura County Air Pollution Control District (VCAPCD), but is not specifically required as part of the Annual Compliance Certification Report or the Semi-Annual Monitoring Report. This attachment includes the monthly landfill throughputs, as the opacity compliance form was submitted with the first half 2018 reports.

This submittal is made in accordance with Title 40 Code of Federal Regulations (CFR) Part 70.5, State Operating Permit Programs. The attached reports satisfy the requirements under the Oxnard Landfill's Title V Permit, VCAPCD Rule 74.17.1, and the National Emission Standards for Hazardous Air Pollutants for municipal solid waste landfills (40 CFR Part 63, Subpart AAAAA).

The SSM Plan Report also satisfies the requirements under the 40 CFR 63.10(d)(5). For this reporting period, the actions taken during all SSM events were consistent with the procedures in the SSM Plan at the facility. There were no instances where the SSM Plan was not adequate for the situation.

If you have any questions or require additional information, please contact me at (805) 658-4675 or Edward Pettit at (805) 207-2218.

Sincerely,



Matt Baumgardner  
Director of Operations  
Ventura Regional Sanitation District

#### Attachments

1. Semi-Annual EG/Title V Report for July 1 to December 31, 2018
2. Semi-Annual Startup, Shutdown and Malfunction Plan Report for July 1 to December 31, 2018
3. Annual Title V Compliance Certification for January 1, 2018 to December 31, 2018
4. Supplemental Information Historically Submitted with Title V Reports

Copy: United States Environmental Protection Agency, Region IX

**ATTACHMENT 1**  
**SEMI-ANNUAL EG/TITLE V REPORT**

**Second Semi-Annual 2018 Title V Report  
and Emissions Guidelines (EG) Report  
Oxnard Landfills  
Oxnard, California**



From:

**Ventura Regional Sanitation District**

1001 Partridge Drive, Suite 150  
Ventura, California 93003

For Submittal to:

**Ventura County Air Pollution Control District**

669 County Square Drive  
Ventura, California 93003  
(805) 645-1421

February 2019

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**SEMI-ANNUAL TITLE V REPORT OF REQUIRED MONITORING**

Ventura County APCD Rule 33.9 requires that "any document, including reports, schedule of compliance progress reports and compliance certifications, required by a Part 70 permit shall be certified by a responsible official." Therefore, this form shall be signed by the company's Responsible Official and submitted with all such reports, including, but not limited to semi-annual reports, deviation and emergency reports and any periodic reports required by a Part 70 permit. However, when submitting your Annual Compliance Certifications, please use the form titled Annual Compliance Certification Signature Cover Form. Semi-annual reports, deviations and emergency reports and any periodic reports required by your Part 70 permit should be submitted to:

Daniel Cho  
Air Quality Engineer  
Ventura County Air Pollution Control District  
669 County Square Drive  
Ventura, CA 93003

**Certification by Responsible Official**

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this compliance certification are true, accurate, and complete.

Signature and Title of Responsible Official:  Title: Matt Baumgardner Director of Operations	Date: 1/14/19
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Time Period Covered by the Semi-Annual Report of Required Monitoring:  07/01/2018 to 12/31/2018
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## 1.0 INTRODUCTION

This semi-annual Title V and Emissions Guidelines Report for the Oxnard Landfills (OLF or Landfill) is being submitted by the Ventura Regional Sanitation District (VRSD) to the Ventura County Air Pollution Control District (VCAPCD) in compliance with the following:

- VCAPCD Rule 74.17.1
- Sections within 40 Code of Federal Regulations (CFR) Part 60, Subpart WWW ("NSPS"), including 40 CFR 60.757(f), which describe the items to be submitted in a semi-annual report for landfills seeking to comply with NSPS using an active collection system
- In compliance with 40 CFR 63, Subpart AAAA (National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Landfills), the NSPS annual report is submitted semi-annually
- To fulfill the semi-annual reporting requirement under the facility's Title V permit (No. 07340)

The semi-annual report includes the following information, as required by VCAPCD Rule 74.17.1 and 40 CFR 60.757(f), for the reporting period from July 1 through December 31, 2018:

- Value and length of time for exceedance of applicable parameters monitored under 40 CFR 60.756(a), (b), (c), and (d).
- Description and duration of all periods when the gas stream is diverted from the control device.
- Description and duration of all periods when the control device was not operating for more than 1 hour.
- All periods when the collection system was not operating in excess of 5 days.
- The location of each of the 500 parts per million by volume (ppmv) methane exceedances, and the concentration recorded at each location for which an exceedance was recorded in the previous month.
- The date of installation and the location of each well or collection system expansion added to the existing system pursuant to 40 CFR 60.755 paragraphs (a)(3), (b), and (c)(4).



## 2.0 BACKGROUND INFORMATION

### 2.1 OWNER AND OPERATOR INFORMATION

OLF is operated by VRSD. The facility consists of three separate parcels/municipal solid waste (MSW) disposal sites: Bailard Landfill, Coastal Landfill, and Santa Clara Landfill. VRSD owns the Bailard and Coastal Landfills. The City of Oxnard owns the Santa Clara Landfill. The facility is located in Oxnard, California at the following address: Oxnard Landfills, 4105 W. Gonzales Road, Oxnard, California 93036.

OLF is located in western Ventura County in the city of Oxnard, near the interstation of the Santa Clara River and the Ventura Freeway (Highway 101). The landfills are closed and have not received refuse since 1996. The Santa Clara Landfill was closed in 1982 and subsequently developed as the River Ridge Golf Course. In 2000, a landfill gas (LFG) collection system and control system (GCCS) was installed in each of the landfills, and two 40.5 million British Thermal Units per hour (MMBtu/hr) Sur-Lite LFG-fired enclosed flares (Flare No 1 and 2) located at the Coastal Landfill serves the three LFG GCCSs. In 2010, Flare No. 2 was removed from service and will be used for parts for Flare No. 1.

### 2.2 DESCRIPTION OF LANDFILL GAS COLLECTION AND CONTROL SYSTEM

The LFG GCCS's installed at the OLF is shown in the site plan provided in Appendix A, and consists of the following components:

- Vertical extraction wells and horizontal trench collectors.
- A system of lateral piping which connects the vertical wells and trench collectors to a main header system.
- A main collection header, which transports LFG to the control devices.
- A 40.5 MMBtu/hr Sur-Lite Model Sacramento LFG flare (No. 1)
- LFG Particulate Scrubbers, condensate collection and storage tanks, and electric powered blowers system

The purpose of the GCCS is to minimize potential environmental impacts associated with LFG, including the following:

- LFG emissions at the landfill surface.
- LFG emissions out of the control devices.
- LFG migration through the vadose zone.

The GCCS removes LFG under a vacuum from the landfill mass. The system collects and controls migrating surface and subsurface gases from the disposal area.



### 3.0 MONITORING AND RECORDS REQUIRED UNDER NSPS

The following information required to be submitted in the NSPS semi-annual report as referenced in Section 1 is organized in Section 3 as follows:

- Continuously Monitored Parameters
  - Wellhead Monitoring Data
  - Flare Station Monitoring Data
  - Description and Duration of Periods when Gas was Diverted from the Control System
  - Minimum Flare Temperature
  - Control System Downtime
  - Collection System Downtime
- Surface Emissions Monitoring Data
  - Annual Monitoring
- Cover Integrity Monitoring
- Gas Collection System Installations and Upgrades
- Performance Testing
  - Source Test Results
- Title V Compliance

#### 3.1 CONTINUOUSLY MONITORED PARAMETERS

Applicable parameters continuously monitored under 40 CFR 60.756(a), (b), (c), and (d), include the following which should be monitored:

- Pressure applied to the extraction wells via the gas collection header should be monitored on a monthly basis. A vacuum must be maintained at each wellhead to be in compliance with 40 CFR 60.753 (b).
- Nitrogen or oxygen content of LFG at the wellheads should be monitored on a monthly basis. Nitrogen must be less than 20% or oxygen less than 5% to be in compliance with 40 CFR 60.753 (c).
- Temperature of the LFG at the wellheads should be monitored on a monthly basis. Temperature must be maintained below 55 degrees Celsius (C) [131 degrees Fahrenheit (F)] to be in compliance with 40 CFR 60.753 (c).

- A temperature monitoring device with a continuous recorder shall be installed at the flare station. The temperature monitoring data are used to demonstrate when the flare is on or off-line and that flare is meeting minimum temperature requirement. The flare monitoring device must be operating continuously to be in compliance with 40 CFR 60.756 (b) or (c).
- A gas flow rate measuring device, which records flow at least once every 15 minutes, must be installed at the flare station. The flow rate monitoring data are used to determine amount of time the LFG collection and control systems are on-line. The flare monitoring device must be operating continuously to be in compliance with 40 CFR 60.756 (b) or (c) and to show that the flare and/or other control device is on-line at any time that the collection system is operating (in compliance with 40 CFR 60.753 (e) and (f)).

### 3.1.1 Wellhead Monitoring Data

Wellhead monitoring data from the monthly monitoring events during the reporting period included wellhead vacuum, oxygen content of LFG at the wellheads, and the temperature of LFG at the wellheads. These data provide the following information regarding compliance with 40 CFR 60.753:

- During the reporting period, all operation of extraction wells had negative pressure, except for two (2) events. Well EBT-BV9 had a pressure of 0.0 inches water column ("w.c.) on August 8, 2018 and well VC-26 had a pressure of 0.0 "w.c. on October 29, 2018. Per CFR 60.755(a)(3), corrective action and re-monitoring was taken and both wells were corrected within 15 days. On August 9, 2018, well EBT-BV9 had a pressure of -0.01 "w.c. and on October 29, 2018, well VC-26 had a pressure of -0.01 "w.c.
- During the reporting period, all wells were operated with LFG temperatures less than 55 degrees C (131 degrees F), which demonstrates compliance with the EG per 40 CFR 60.755(a)(5).
- During the reporting period, all operational extraction wells had oxygen contents of less than 5%, except forty-two (42) events. Per CFR 60.755 (a)(5), corrective action and re-monitoring was taken and all forty-two (42) wells were corrected within 15 days. Dates and duration when oxygen at the wellheads were above 5% are summarized in Table 1 below.

**Table 1. Summary of Wells Above 5% Oxygen**

Well	Initial Date	Initial Oxygen	Re-Monitoring Date (s)	Compliant Oxygen	Duration (Days)
		(% O2)		(% O2)	
EBT-BV8	7/24/18	11.0	7/24/18 8/6/18	4.9	13
WBT-WAV4	7/24/18	11.0	7/24/18 8/6/18	0.7	13
WBT-WAV7	7/24/18	15.4	7/24/18 8/6/18	2.0	13

Well	Initial Date	Initial Oxygen (% O2)	Re-Monitoring Date (s)	Compliant Oxygen (% O2)	Duration (Days)
WBT-WAV6	7/24/18	16.4	7/24/18 8/6/18	3.4	13
VC-110	7/25/18	7.5	7/25/18 8/7/18	4.3	13
VC-111	7/25/18	20.4	7/25/18 8/7/18	4.9	13
VC-114	7/25/18	10.4	7/25/18 8/7/18	0.4	13
VC-26	7/25/18	10.2	7/25/18 8/7/18	2.9	13
SC-W19	7/25/18	16.7	7/25/18 8/6/18	2.8	12
VC-10	7/30/18	5.5	7/30/18 8/7/18	4.8	8
VC-11	7/30/18	5.6	7/30/18 8/7/18	3.0	8
VC-8	7/30/18	6.9	7/30/18 8/7/18	3.2	8
EBT-BV7	8/8/18	5.1	8/8/18 8/9/18	4.8	1
WBT-WAV11	8/8/18	8.4	8/8/18 8/9/18	3.5	1
WBT-WAV30	8/8/18	5.5	8/8/18 8/9/18	3.1	1
SC-W19	8/20/18	18.9	8/20/18 8/29/18	3.1	9
EBT-BV8	9/7/18	14.0	9/7/18 9/13/18	3.7	6
WBT-WAV7	9/7/18	19.8	9/7/18 9/13/18 9/20/18	0.0	13
WBT-WAV6	9/7/18	18.9	9/7/18 9/13/18 9/18/18	4.9	11
WBT-WAV11	9/7/18	5.9	9/7/18 9/13/18 9/18/18	0.0	11
EBT-BV9	9/7/18	8.0	9/7/18 9/13/18	1.0	6
SC0W19	9/10/18	15.9	9/10/18 9/20/18	4.3	10
VC-110	9/11/18	17.2	9/11/18	2.2	0

Well	Initial Date	Initial Oxygen (% O2)	Re-Monitoring Date (s)	Compliant Oxygen (% O2)	Duration (Days)
VC-111	9/11/18	21.4	9/11/18 9/20/18	4.6	9
VC-10	9/11/18	8.6	9/11/18 9/20/18	4.7	9
VC-11	9/11/18	9.0	9/11/18 9/20/18	4.9	9
WBT-WAV2	10/12/18	20.5	10/12/18 10/25/18	0.0	13
WBT-WAV7	10/12/18	18.6	10/12/18 10/25/18	2.0	13
WBT-WAV11	10/12/18	5.9	10/12/18 10/25/18	1.8	13
WBT-WAV32	10/12/18	12.8	10/12/18	0.1	0
WBT-WAV33	10/12/18	5.7	10/12/18	0.0	0
EBT-BV5	10/25/18	12.6	10/25/18	0.2	0
EBT-BV7	10/25/18	8.8	10/25/18 11/2/18	4.9	8
VC-8	10/29/18	6.2	10/29/18	4.9	0
SC-W7	10/29/18	8.0	10/29/18 11/9/18	0.7	11
SC-W19	10/29/18	6.4	10/29/18 11/9/18	1.3	11
WBT-WAV7	11/5/18	10.2	11/5/18 11/14/18	1.9	9
WBT-WAV30	11/5/18	5.4	11/5/18 11/14/18	0.0	9
SC-W19	12/13/18	19.4	12/13/18 12/21/18	4.8	8
VC-7	12/21/18	13.2	12/21/18 1/3/19	4.8	13
VC-8	12/21/18	6.5	12/21/18 1/3/19	4.9	13

Wellhead readings for wells that were off-line due to maintenance, active filling or on-site construction activities; taken offline for well Startup, Shutdown, and Malfunction (SSM) events; and/or shut-off to control increased well temperature to prevent a subsurface fire as exempt under 40 CFR 60.753(b), were excluded from the above review.



### 3.1.2 Flare Station Monitoring Data

A temperature monitoring device with a continuous recorder and a LFG flow rate monitoring device which records flows at least every 15 minutes is installed at the flare station. The monitoring records are summarized and kept on file at the landfill. During the reporting period, the gas collection system was operated in compliance with the requirement to operate the system such that all collected gases are vented to a control system (40 CFR 60.753 (e)), and the requirement to operate the control or treatment system at all times when the collected gas is routed to the system (40 CFR 60.753 (f)). The flare station is equipped with an automatic shutdown and alarm system, which shuts down the blowers and closes a valve on the main header pipe whenever the flare shuts down. This ensures that no collected LFG is vented to the atmosphere untreated.

Missing or invalid monitoring data can potentially be a deviation for the minimum temperature requirement for the flares if one or more hours of data in a 3-hour block is missing or invalid as defined by more than 15 minutes of missing and/or invalid data in an hour. There were no occurrences during the reporting period where there was a loss of data except during SSM events.

### 3.1.3 Description and Duration of Periods when Gas was Diverted from Control System

As noted above, flare station blowers automatically shut down whenever the flare shuts down. Thus, collected LFG was at no time diverted from combustion at the control device during the reporting period.

### 3.1.4 Minimum Flare Temperature

The 2016 biennial source test for the flare was performed on June 6, 2016, and the source test report was submitted on July 1, 2016 with a temperature at 1,502 degrees F. During the reporting period from July 1 through July 12, 2018, the minimum temperature at which the flare should operate was 1,452 degrees F (1,502 degrees F – 50 degrees F).

The 2018 biennial source test for the flare was performed on June 5-6, 2018, and the source test report was submitted on July 13, 2018 with a temperature at 1,499 degrees F. During the reporting period from July 13 through December 31, 2018, the minimum temperature at which the flare should operate was 1,449 degrees F (1,499 degrees F – 50 degrees F).

The average temperature for the flare for a three (3)-hour time period cannot fall below the established minimum temperatures except during periods of SSM. Note that the permitted minimum temperature for the flare is 1,100 degrees F, which is below the minimum under the NSPS.

During the reporting period, the average temperature for the flare did not drop below the established minimum NSPS temperatures, excluding SSM events.

### 3.1.5 Control System Downtime

The GCCS's at the OLF route all LFG to the blower/flare station. Collection system shutdown occurs when the blower/flare station are shut down. If this occurs, all exit valves automatically shut and LFG would not be vented to the atmosphere.

Blower/flare station shutdowns (for more than one hour) occurred at various times during the reporting period of July 1 through December 31, 2018 due to, but not limited to, the following reasons:

- High oxygen
- Scheduled or unscheduled flare or collection system maintenance/repair

Therefore, at no time was the collected LFG emitted without destruction during the reporting period. Also in no instances did free venting of LFG occur during the reporting period. Individual flare station shutdowns exceeding 1 hour in duration are included in Table 2 below.

**Table 2. Summary of Flare Downtime Greater than 1 Hour**

Control System Periods of Downtime Exceeding 1 Hour		
Date	Duration	Reason for Shutdown
	(Hrs:Min)	
8/8/18	4:01	Flare manually shutdown for scheduled maintenance
9/4/18	16:50	Flare shutdown due to high oxygen
9/6/18	5:02	Flare shutdown for scheduled maintenance
9/14/18	2:44	Flare shutdown due to high oxygen
9/15/18	2:25	Flare shutdown due to high oxygen
10/11/18	7:14	Flare shutdown due to high oxygen
10/12/18	13:54	Flare shutdown due to high oxygen
10/14/18	14:18	Flare shutdown due to high oxygen
10/21/18	3:09	Flare shutdown due to high oxygen
10/24/18	2:09	Flare shutdown for scheduled maintenance/inspection

### 3.1.6 Collection System Downtime

At no time in the reporting period was the collection system shut down for more than 5 consecutive days.

## 3.2 SURFACE EMISSION MONITORING DATA

Landfill surface emissions monitoring ("instantaneous surface sweeps") was performed on an annual basis to measure concentrations of total organic carbon (TOC) as methane using a portable flame ionization detector organic vapor analyzer, which meets NSPS specifications. Annual reports summarizing the monitoring dates, survey pathways, calibration records and results will be kept on file and made available upon request. The results of the monitoring are summarized below. Per 40 CFR 60.756(f), any closed landfill that has no monitored exceedances of the operational standard in three consecutive quarterly monitoring periods may skip to annual monitoring. Any methane reading of 500 ppm or more above background detected during the annual monitoring returns the frequency for that landfill to quarterly monitoring.



### 3.2.1 Annual Monitoring

The 2018 annual instantaneous surface emissions monitoring event was performed by RES Environmental, Inc. (RES) at the landfills on the dates shown below:

- Bailard Landfill: August 20, 21, and 22, 2018
- Coastal Landfill: December 18 and 19, 2018
- Santa Clara Landfill: December 17 and 18, 2018

The 2018 annual instantaneous surface emissions monitoring event was performed on the above listed dates by RES. The events resulted in zero (0) areas of the landfill having TOC concentrations above 500 ppmv, measured as methane. There were no areas which triggered the NSPS 120-day timeline to implement a system expansion.

### 3.3 COVER INTEGRITY MONITORING

Per 40 CFR 60.755(c)(5), the site must implement a program to monitor for cover integrity and implement cover repairs as necessary on a monthly basis. OLF monitored for cover integrity on a monthly basis during the reporting period (see Appendix B). OLF personnel have been provided direction on the monthly program requirement.

### 3.4 GAS COLLECTION SYSTEM INSTALLATIONS AND UPGRADES

There were no installations or upgrades during the reporting period at the OLF site during the reporting period.

## 4.0 PERFORMANCE TEST

The facility is required to perform a source test on the flare once every two years as required by Rule 74.17.1 and an air toxics test once every four years as required by Condition No. 10 of the PTO. The compliance test for Non-Methane Organic Compounds (NMOC), Nitrogen Oxides (NOx), Sulfur Oxides (SOx), and Carbon Monoxide (CO) for the flare was tested on June 5-6, 2018 and reported on July 13, 2018.

Performance test summary information on the NMOCs, NOx, SOx, and CO emissions for the flare is provided in Table 3 below.

**Table 3. Summary of Source Test Results**

Test Date	Parameter	Flare Result	Emission Limit
Flare 6/5-6/18	NOx Emission Rate (lb/MMBtu)	0.0427	0.06 lb/MMBtu
	CO Emission Rate (lb/MMBtu)	0.0152	0.20 lb/MMBtu
	SOx Emission Rate (lb/MMBtu)	0.0024	0.02 lb/MMBtu
	NMOC Emission Rate (ppmv, as hexane @ 3% O <sub>2</sub> )	0.537	20 ppmv
	NMOC Destruction Efficiency (%)	94.4	98%

Note: Compliance with NMOCs is met with 98% destruction efficiency or less than 20 ppmv outlet as hexane@3% oxygen, so compliance was achieved.

Please note that methane destruction efficiency testing under Condition No. 3 from the Title 17 California Code of Regulations section in the PTO was conducted on June 5-6, 2018. The methane destruction efficiency was 99.99.

## 5.0 TITLE V COMPLIANCE

During the reporting period, the Landfill performed all required monitoring and maintained the appropriate records.

APPENDIX A  
LANDFILL SITE PLAN

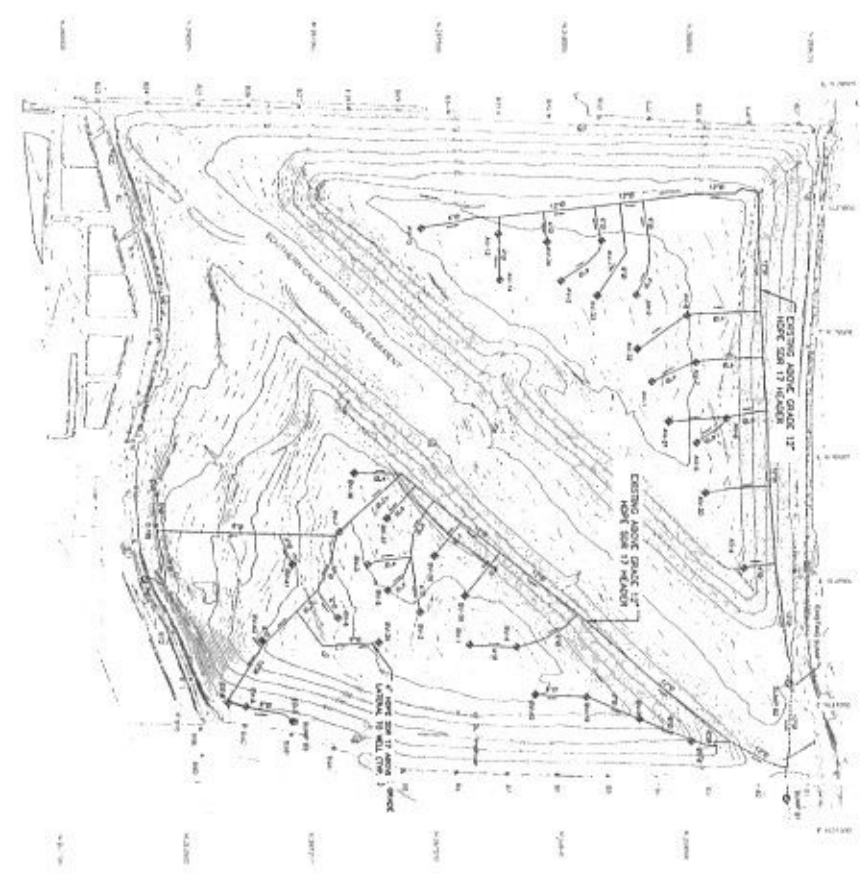


REV	DATE	DESCRIPTION	BY	CHECKED BY

CLIENT: B. GONZALES

ENGINEER  
  
**BIOGAS**  
**ENGINEERING**  
 1000 S. GARDEN AVENUE  
 SUITE 100  
 SAN ANTONIO, TX 78205  
 TEL: 214-343-1000  
 WWW.BIOGAS-ENGINEERING.COM

DATE: 6/7/26  
 PROJECT: BAILLARD EXISTING LEIG GOCS MAP  
 SHEET: 1 OF 1  
 DRAWN BY: JG  
 CHECKED BY: JG  
 PROJECT LOCATION:  
 COASTAL SANTA CLARA ANT  
 BAILLARD LANDFILLS



- LEGEND**
- ◆ EXISTING UTILITY EXTRACTED WELL
  - ◆ NEW UTILITY HORIZONTAL WELL
  - ◆ ABOVE GRADE ABOVE 500 17 UT F
  - ◆ EXISTING UTILITY MONITOR WARDING PILE
  - ◆ PROPERTY BOUNDARY/CONCRETE
  - BELOW GRADE STAIRS
  - HOT PILE OR
  - CONDENSATE FLOW DIRECTION ARROW



NO.	DATE	DESCRIPTION	DESIGNED BY	CHECKED BY	DATE

CLIENT & OWNER

 **SANTA CLARA COUNTY**  
SANTA CLARA COUNTY  
SANTA CLARA COUNTY  
SANTA CLARA COUNTY

ENGINEER

 **BIOGAS ENGINEERING**  
SANTA CLARA COUNTY  
SANTA CLARA COUNTY  
SANTA CLARA COUNTY  
SANTA CLARA COUNTY  
SANTA CLARA COUNTY

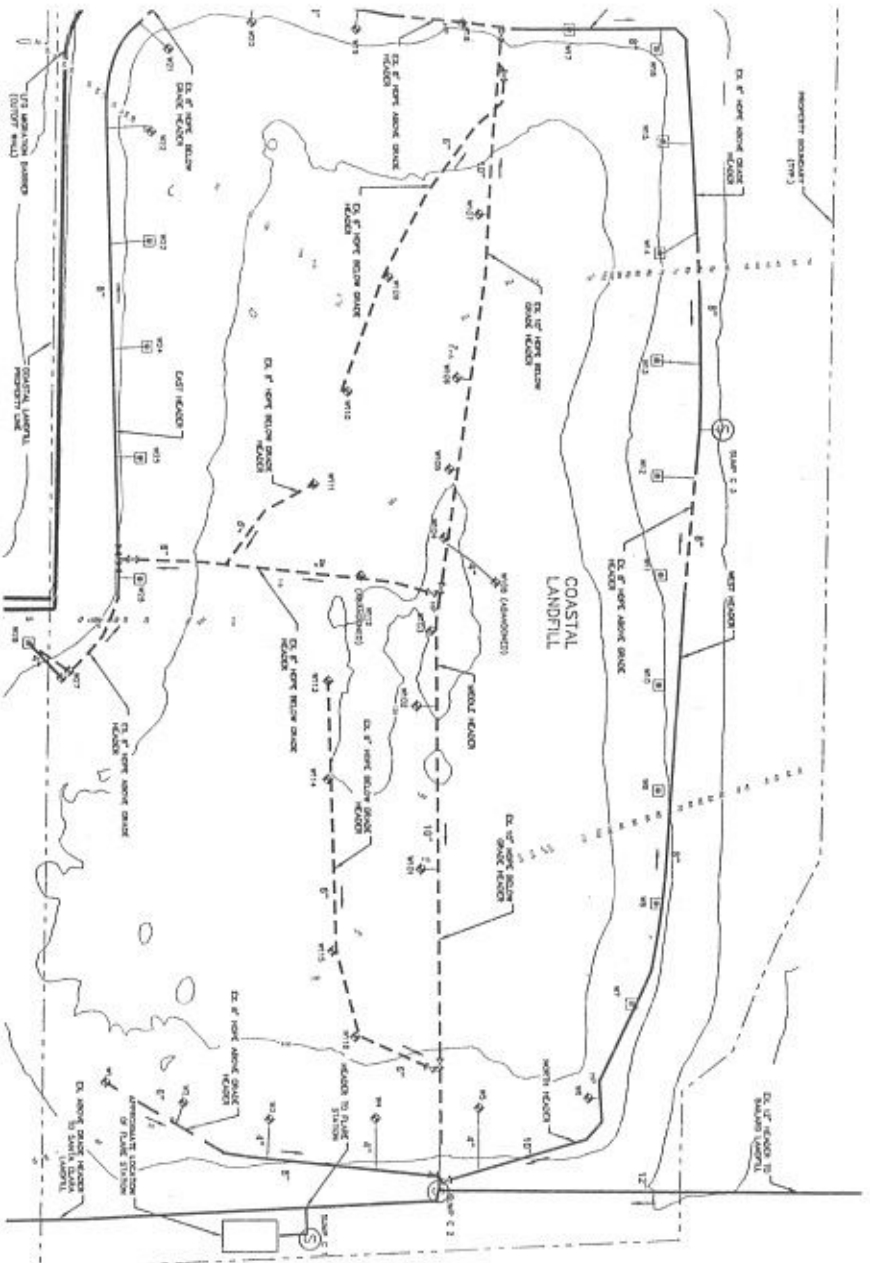
SANTA CLARA LANDFILL OCCS MAP

IFG OCCS MAP  
CONSTANT, SANTA CLARA AND  
BAYLAND LANDFILLS

DATE: 10/20/2011

EX-  
REVISION





**LEGEND**

—— 12' ABOVE GRADE (7' P.C. 50' - 40' P.C.)	⊕	UTS DISTINCTION WELL
—— 12' ABOVE GRADE (7' P.C. 50' - 40' P.C.)	⊙	CONCRETE SLAB
—— 12' ABOVE GRADE (7' P.C. 50' - 40' P.C.)	⊗	UTS WAVE (TMS)
—— 12' BELOW GRADE (7' P.C. 50' - 40' P.C.)	---	PROPERTY LINE
----- EXISTING CONTAINERS		
----- 12' BELOW GRADE (7' P.C. 50' - 40' P.C.)		

DATE: 01/15/2015	BY: [Redacted]	CHECK: [Redacted]	SCALE: 1" = 30'		<b>BIOGAS ENGINEERING</b> 11900 ORANGE BLVD. SANTA ANITA CA 91760 PH: 909-893-8071	<b>COASTAL LANDFILL GGCS MAP</b>  LFG GGCS MAP COASTAL, SANTA CLARA AND BAYLARD LANDFILLS	DRAWING NO: <b>EX-4</b> PROJECT NO:	
DATE: 01/15/2015	BY: [Redacted]	CHECK: [Redacted]	<b>PROJECT &amp; GROUP</b>					
DATE: 01/15/2015	BY: [Redacted]	CHECK: [Redacted]						
DATE: 01/15/2015	BY: [Redacted]	CHECK: [Redacted]						

**APPENDIX B**  
**COVER INTEGRITY MONITORING**











































**ATTACHMENT 2**  
**SEMI-ANNUAL SSM PLAN REPORT**





Ventura County  
Air Pollution  
Control District

**RESPONSIBLE OFFICIAL'S  
CERTIFICATION FORM**

Ventura County APCD Rule 33.9 requires that "any document, including reports, schedule of compliance progress reports and compliance certifications, required by a Part 70 permit shall be certified by a responsible official." Therefore, this form shall be signed by the company's Responsible Official and submitted with all such reports, including, but not limited to semi-annual reports, deviation and emergency reports and any periodic reports required by a Part 70 permit. However, when submitting your Annual Compliance Certifications, please use the form titled Annual Compliance Certification Signature Cover Form.

Semi-annual reports, deviations and emergency reports and any periodic reports required by your Part 70 permit should be submitted to:

Daniel Cho  
Air Quality Engineer  
Ventura County Air Pollution Control District  
669 County Square Drive  
Ventura, CA 93003

**Certification by Responsible Official**

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this document is true, accurate, and complete.

<p>Signature and Title of Responsible Official:</p> <p>Signature: _____  _____</p> <p>Title: <u>Director of Operations</u> _____</p>	<p>Date: 2/14/19</p>
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## DESCRIPTION OF SSM EVENTS FOR FLARE

Reporting period July 1 through December 31, 2018

Start of Event	End of Event	Total Duration (Hrs:Min)	Equipment Affected*	Type of Event	Description of Event	Were SSM Plan Procedures Followed (Y/N)	Date of SSM Plan Revision to Address Event *
7/3/18	7/3/18	0:41	Flare	Shutdown/Startup	Flare manually shutdown for gas collection system maintenance	Y	N/A
8/8/18	8/8/18	4:01	Flare	Shutdown/Startup	Flare manually shutdown for scheduled maintenance	Y	N/A
9/4/18	9/4/18	0:14	Flare	Malfunction	Flare shutdown due to power outage	Y	N/A
9/4/18	9/5/18	16:50	Flare	Malfunction	Flare shutdown due to high oxygen	Y	N/A
9/6/18	9/6/18	5:02	Flare	Shutdown/Startup	Flare shutdown for scheduled maintenance	Y	N/A
9/14/18	9/14/18	2:44	Flare	Malfunction	Flare shutdown due to high oxygen	Y	N/A
9/15/18	9/15/18	2:25	Flare	Malfunction	Flare shutdown due to high oxygen	Y	N/A
9/19/18	9/19/18	0:10	Flare	Shutdown/Startup	Flare shutdown for scheduled maintenance	Y	N/A
9/19/18	9/19/18	0:29	Flare	Shutdown/Startup	Flare shutdown for scheduled maintenance	Y	N/A
10/11/18	10/11/18	7:14	Flare	Malfunction	Flare shutdown due to high oxygen	Y	N/A
10/12/18	10/13/18	13:54	Flare	Malfunction	Flare shutdown due to high oxygen	Y	N/A
10/14/18	10/15/18	14:18	Flare	Malfunction	Flare shutdown due to high oxygen	Y	N/A
10/21/18	10/21/18	3:09	Flare	Malfunction	Flare shutdown due to high oxygen	Y	N/A
10/24/18	10/24/18	2:09	Flare	Shutdown/Startup	Flare shutdown for scheduled maintenance/inspection	Y	N/A
11/19/18	11/19/18	0:07	Flare	Shutdown/Startup	Flare shutdown to switch memory card	Y	N/A
12/4/18	12/4/18	0:42	Flare	Shutdown/Startup	Flare shutdown for scheduled maintenance/inspection	Y	N/A
12/30/18	12/30/18	0:44	Flare	Shutdown/Startup	Flare manually shutdown for scheduled maintenance	Y	N/A

\*Not Applicable if SSM Plan Procedures were followed during event

\*\*Malfunction events assume automatic startup unless otherwise noted

\*\*\*There were no SSM events for the flare monitoring devices during the reporting period

Note there were no SSM events for the collection system during the reporting period.

## Startup, Shutdown, and Malfunction Plan Deviation Report

Facility: Oxnard Landfills (Bailard, Coastal, Santa Clara)

Date Form Completed: 07/03/2018

Unit ID: Coastal Flare, LFG Collection System

Event:  *appropriate box*

Startup

Shutdown

Malfunction

Date: 07/03/18

Time: Off 12:17 PM On 12:58 PM

Duration: 0 hours 41 minutes

Provide detailed explanation of the circumstance of the startup, shutdown, malfunction:

The Coastal Flare was shut off for GCS Maintenance - Air Line repaired by AWD at the SW corner of the Coastal Landfill.

Provide description of corrective action:

The flare was restarted and operating at temperature by 12:58 after repairs.

Describe the reasons the Startup, Shutdown, Malfunction Plan was not adequate:

n/a

Describe proposed revisions to the Startup, Shutdown, Malfunction Plan:

n/a

Were any excess emissions and/ or parameter monitoring exceedances believed to have occurred during the event:

Yes

No

## Startup, Shutdown, and Malfunction Plan Deviation Report

Facility: Oxnard Landfills (Bailard, Coastal, Santa Clara)

Date Form Completed: 08/08/2018

Unit ID: Coastal Flare, LFG Collection System

Event:  *appropriate box.*

Startup

Shutdown

Malfunction

Date: 08/08/18

Time: Off 7:22 AM On 11:23 AM

Duration: 4 hours 1 minutes

Provide detailed explanation of the circumstance of the startup, shutdown, malfunction:

The Coastal Flare was shutdown for Flare Maintenance (blowers switched and greased, and memory card) at 7:22 AM.

Provide description of corrective action:

The flare was restarted and operating at temperature by 11:23 AM.

Describe the reasons the Startup, Shutdown, Malfunction Plan was not adequate:

n/a

Describe proposed revisions to the Startup, Shutdown, Malfunction Plan:

n/a

Were any excess emissions and/ or parameter monitoring exceedances believed to have occurred during the event:

Yes

No

## Startup, Shutdown, and Malfunction Plan Deviation Report

Facility: Oxnard Landfills (Bailard, Coastal, Santa Clara)

Date Form Completed: 09/05/2018

Unit ID: Coastal Flare, LFG Collection System

Event:  *appropriate box.*

Startup

Shutdown

Malfunction

Date: 09/04/18

Time: Off 6:06 PM On 6:20 PM

Duration: 0 hours 14 minutes

Provide detailed explanation of the circumstance of the startup, shutdown, malfunction:

The Coastal Flare shutdown at 6:06 PM due to SCE Grid Trip.

Provide description of corrective action:

The flare auto restarted and was operating at temperature by 6:20 PM.

Describe the reasons the Startup, Shutdown, Malfunction Plan was not adequate:

n/a

Describe proposed revisions to the Startup, Shutdown, Malfunction Plan:

n/a

Were any excess emissions and/ or parameter monitoring exceedances believed to have occurred during the event:

Yes

No

## Startup, Shutdown, and Malfunction Plan Deviation Report

Facility: Oxnard Landfills (Bailard, Coastal, Santa Clara)

Date Form Completed: 09/05/2018

Unit ID: Coastal Flare, LFG Collection System

Event:  *appropriate box.*

Startup

Shutdown

Malfunction

Date: 09/04-05/18

Time: Off 09/04/18 8:48 PM On 09/05/18 1:38 PM

Duration: 16 hours 50 minutes

Provide detailed explanation of the circumstance of the startup, shutdown, malfunction:

The Coastal Flare shutdown on 09/04/18 at 8:48 PM due to high O2.

Provide description of corrective action:

The flare was restarted and operating at temperature on 09/05/18 by 1:38 PM.

Describe the reasons the Startup, Shutdown, Malfunction Plan was not adequate:

n/a

Describe proposed revisions to the Startup, Shutdown, Malfunction Plan:

n/a

Were any excess emissions and/ or parameter monitoring exceedances believed to have occurred during the event:

Yes

No

## Startup, Shutdown, and Malfunction Plan Deviation Report

Facility: Oxnard Landfills (Bailard, Coastal, Santa Clara)

Date Form Completed: 09/07/2018

Unit ID: Coastal Flare, LFG Collection System

Event:  *appropriate box.*

Startup

Shutdown

Malfunction

Date: 09/06/18

Time: Off 8:43 AM On 1:45PM

Duration: 5 hours 2 minutes

Provide detailed explanation of the circumstance of the startup, shutdown, malfunction:

The Coastal Flare was shutdown at 8:43 AM for scheduled flare maintenance by ICS and SCS Engineering. The flare was on and off during this time period.

Provide description of corrective action:

The flare was restarted and operating at temperature by 1:45 PM.

Describe the reasons the Startup, Shutdown, Malfunction Plan was not adequate:

n/a

Describe proposed revisions to the Startup, Shutdown, Malfunction Plan:

n/a

Were any excess emissions and/ or parameter monitoring exceedances believed to have occurred during the event:

Yes

No



## Startup, Shutdown, and Malfunction Plan Deviation Report

Facility: Oxnard Landfills (Bailard, Coastal, Santa Clara)

Date Form Completed: 09/14/2018

Unit ID: Coastal Flare, LFG Collection System

Event:  *appropriate box.*

Startup

Shutdown

Malfunction

Date: 09/14/18

Time: Off 5:41 AM On 8:25 AM

Duration: 2 hours 44 minutes

Provide detailed explanation of the circumstance of the startup, shutdown, malfunction:

The Coastal Flare shutdown at 5:41 AM due to High O2.

Provide description of corrective action:

The flare was restarted and operating at temperature by 8:25 AM.

Describe the reasons the Startup, Shutdown, Malfunction Plan was not adequate:

n/a

Describe proposed revisions to the Startup, Shutdown, Malfunction Plan:

n/a

Were any excess emissions and/ or parameter monitoring exceedances believed to have occurred during the event:

Yes

No

## Startup, Shutdown, and Malfunction Plan Deviation Report

Facility: Oxnard Landfills (Bailard, Coastal, Santa Clara)

Date Form Completed: 09/15/2018

Unit ID: Coastal Flare, LFG Collection System

Event:  *appropriate box.*

Startup

Shutdown

Malfunction

Date: 09/15/18

Time: Off 6:29 AM On 8:54 AM

Duration: 2 hours 25 minutes

Provide detailed explanation of the circumstance of the startup, shutdown, malfunction:

The Coastal Flare shutdown at 6:29 AM due to High O2.

Provide description of corrective action:

The flare was restarted and operating at temperature by 8:54 AM.

Describe the reasons the Startup, Shutdown, Malfunction Plan was not adequate:

n/a

Describe proposed revisions to the Startup, Shutdown, Malfunction Plan:

n/a

Were any excess emissions and/ or parameter monitoring exceedances believed to have occurred during the event:

Yes

No

## Startup, Shutdown, and Malfunction Plan Deviation Report

Facility: Oxnard Landfills (Bailard, Coastal, Santa Clara)

Date Form Completed: 09/19/2018

Unit ID: Coastal Flare, LFG Collection System

Event:  *appropriate box.*

Startup

Shutdown

Malfunction

Date: 09/19/18

Time: Off 9:59 AM On 10:09 AM, and Off 11:09 On 11:38

Duration: 0 hours 39 minutes total

Provide detailed explanation of the circumstance of the startup, shutdown, malfunction:

The Coastal Flare was shutdown at 9:59 and again at 11:09 for scheduled Flare Maintenance.

Provide description of corrective action:

The flare was restarted and operating at temperature by 10:09 and again at 11:38 AM.

Describe the reasons the Startup, Shutdown, Malfunction Plan was not adequate:

n/a

Describe proposed revisions to the Startup, Shutdown, Malfunction Plan:

n/a

Were any excess emissions and/ or parameter monitoring exceedances believed to have occurred during the event:

Yes

No

## Startup, Shutdown, and Malfunction Plan Deviation Report

Facility: Oxnard Landfills (Bailard, Coastal, Santa Clara)

Date Form Completed: 10/12/2018

Unit ID: Coastal Flare, LFG Collection System

Event:  *appropriate box.*

Startup

Shutdown

Malfunction

Date: 10/11/18

Time: Off 8:44 AM On 3:58 PM

Duration: 7 hours 14 minutes

Provide detailed explanation of the circumstance of the startup, shutdown, malfunction:

The Coastal Flare shutdown at 8:44 AM due to High O2.

Provide description of corrective action:

The flare was restarted and operating at temperature by 3:58 PM.

Describe the reasons the Startup, Shutdown, Malfunction Plan was not adequate:

n/a

Describe proposed revisions to the Startup, Shutdown, Malfunction Plan:

n/a

Were any excess emissions and/ or parameter monitoring exceedances believed to have occurred during the event:

Yes

No

## Startup, Shutdown, and Malfunction Plan Deviation Report

Facility: Oxnard Landfills (Bailard, Coastal, Santa Clara)

Date Form Completed: 10/13/2018

Unit ID: Coastal Flare, LFG Collection System

Event:  *appropriate box.*

Startup

Shutdown

Malfunction

Date: 10/12-13/18

Time: Off 9:46 PM On 10/13/18 11:40 AM

Duration: 13 hours 54 minutes

Provide detailed explanation of the circumstance of the startup, shutdown, malfunction:

The Coastal Flare shutdown on 10/12/18 at 9:46 PM due to High O2.

Provide description of corrective action:

The flare was restarted and operating at temperature on 10/13/18 by 11:40 AM.

Describe the reasons the Startup, Shutdown, Malfunction Plan was not adequate:

n/a

Describe proposed revisions to the Startup, Shutdown, Malfunction Plan:

n/a

Were any excess emissions and/ or parameter monitoring exceedances believed to have occurred during the event:

Yes

No

## Startup, Shutdown, and Malfunction Plan Deviation Report

Facility: Oxnard Landfills (Bailard, Coastal, Santa Clara)

Date Form Completed: 10/15/18

Unit ID: Coastal Flare, LFG Collection System

Event:  appropriate box.

Startup

Shutdown

Malfunction

Date: 10/14-15/18

Time: Off 10:11 PM On 10/15/18 12:29 PM

Duration: 14 hours 18 minutes

Provide detailed explanation of the circumstance of the startup, shutdown, malfunction:

The Coastal Flare shutdown on 10/14/18 at 10:11 PM due to High O2.

Provide description of corrective action:

The flare was restarted and operating at temperature on 10/15/18 by 12:29 PM.

Describe the reasons the Startup, Shutdown, Malfunction Plan was not adequate:

n/a

Describe proposed revisions to the Startup, Shutdown, Malfunction Plan:

n/a

Were any excess emissions and/ or parameter monitoring exceedances believed to have occurred during the event:

Yes

No

## Startup, Shutdown, and Malfunction Plan Deviation Report

Facility: Oxnard Landfills (Bailard, Coastal, Santa Clara)

Date Form Completed: 10/21/18

Unit ID: Coastal Flare, LFG Collection System

Event:  *appropriate box.*

Startup

Shutdown

Malfunction

Date: 10/21/18

Time: Off 08:20 AM On 11:29 AM

Duration: 3 hours 9 minutes

Provide detailed explanation of the circumstance of the startup, shutdown, malfunction:

The Coastal Flare shutdown at 8:20 AM due to High O2.

Provide description of corrective action:

The flare was restarted and operating at temperature by 11:29 AM.

Describe the reasons the Startup, Shutdown, Malfunction Plan was not adequate:

n/a

Describe proposed revisions to the Startup, Shutdown, Malfunction Plan:

n/a

Were any excess emissions and/ or parameter monitoring exceedances believed to have occurred during the event:

Yes

No



## Startup, Shutdown, and Malfunction Plan Deviation Report

Facility: Oxnard Landfills (Bailard, Coastal, Santa Clara)

Date Form Completed: 10/24/2018

Unit ID: Coastal Flare, LFG Collection System

Event:  *appropriate box*

Startup

Shutdown

Malfunction

Date: 10/24/18

Time: Off 9:46 AM On 11:55 AM

Duration: 2 hours 9 minutes

Provide detailed explanation of the circumstance of the startup, shutdown, malfunction:

The Coastal Flare was shut off at 9:46 AM for Scheduled Flare Maintenance / Inspection.

Provide description of corrective action:

The flare was restarted and operating at temperature by 11:55 AM.

Describe the reasons the Startup, Shutdown, Malfunction Plan was not adequate:

n/a

Describe proposed revisions to the Startup, Shutdown, Malfunction Plan:

n/a

Were any excess emissions and/ or parameter monitoring exceedances believed to have occurred during the event:

Yes

No

## Startup, Shutdown, and Malfunction Plan Deviation Report

Facility: Oxnard Landfills (Bailard, Coastal, Santa Clara)

Date Form Completed: 11/19/2018

Unit ID: Coastal Flare, LFG Collection System

Event:  *appropriate box*

Startup

Shutdown

Malfunction

Date: 11/19/18

Time: Off 12:44 PM On 12:51 PM

Duration: 0 hours 7 minutes

Provide detailed explanation of the circumstance of the startup, shutdown, malfunction:

The Coastal Flare has (null) data for 7 minutes due to the memory card swap out from 12:44 PM to 12:51 pm.

Provide description of corrective action:

n/a

Describe the reasons the Startup, Shutdown, Malfunction Plan was not adequate:

n/a

Describe proposed revisions to the Startup, Shutdown, Malfunction Plan:

n/a

Were any excess emissions and/ or parameter monitoring exceedances believed to have occurred during the event:

Yes

No

## Startup, Shutdown, and Malfunction Plan Deviation Report

Facility: Oxnard Landfills (Bailard, Coastal, Santa Clara)

Date Form Completed: 12/30/2018

Unit ID: Coastal Flare, LFG Collection System

Event:  *appropriate box.*

Startup

Shutdown

Malfunction

Date: 12/30/18

Time: Off 2:28 PM On 3:12 PM

Duration: 0 hours 44 minutes

Provide detailed explanation of the circumstance of the startup, shutdown, malfunction:

The Coastal Flare was shutdown at 2:28 PM for scheduled Flare Maintenance by ICS.

Provide description of corrective action:

The flare was restarted and operating at temperature by 3:12 PM.

Describe the reasons the Startup, Shutdown, Malfunction Plan was not adequate:

n/a

Describe proposed revisions to the Startup, Shutdown, Malfunction Plan:

n/a

Were any excess emissions and/ or parameter monitoring exceedances believed to have occurred during the event:

Yes

No

**ATTACHMENT 3**

**ANNUAL TITLV V COMPLIANCE CERTIFICATION**



Ventura County  
Air Pollution  
Control District

## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

<p>A. Attachment # or Permit Condition #: P01399PC2</p>	<p>D. Frequency of monitoring: Continuous</p>
<p>B. Description: Condition No. 2 – Rule 29, Flare out of Service</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring:  Annual Compliance Certification</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u>            G. Compliance Status? (C or I): <u>C</u>            H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u>            *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: P01399PC2</p>	<p>D. Frequency of monitoring: Continuous</p>
<p>B. Description: Condition No. 3 – Rule 26, Flare BACT Limits</p>	<p>E. Source test reference method, if applicable. See attach Source Test Summary Form</p>
<p>C. Method of monitoring:  The flare is equipped with a continuous temperature recording device and landfill gas flow totalizer. Source testing every 2 years (ROC, NOx) using EPA test method 25 or 18, 7 and every 4 years (SOx) using modified SCAQMD method 307-94.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u>            G. Compliance Status? (C or I): <u>C</u>            H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u>            *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: P01399PC2</p>	<p>D. Frequency of monitoring: Continuous</p>
<p>B. Description: Condition No. 4 – Rule 54</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring:  Source test flare every 4 years for sulfur compounds using EPA test method 6, 6A, 6C, 8, 15, 16A, 16B, or SCAQMD method 307-94, as appropriate.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u>            G. Compliance Status? (C or I): <u>C</u>            H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u>            *If yes, attach Deviation Summary Form</p>



Ventura County  
Air Pollution  
Control District

## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 18 (MM/DD/YY) to 12 / 31 / 18 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: P01399PC2</p>	<p>D. Frequency of monitoring: Not Applicable.</p>
<p>B. Description: Condition No. 5 – Rule 57.1</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Not required based on District EPA emission factor analysis.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: P01399PC2</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Condition No. 6 – Rule 26 Flare Equipment Requirements</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Monthly function checks of the flare equipment.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: P01399PC2</p>	<p>D. Frequency of monitoring: Monthly and Annually</p>
<p>B. Description: Condition No. 7 – Rule 26 Calibration Requirements</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Annual calibration and monthly function checks of control and recording of the landfill gas flow totalizer to the flare.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>



Ventura County  
Air Pollution  
Control District

## ANNUAL COMPLIANCE CERTIFICATION SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: 01 / 01 / 18 (MM/DD/YY) to 12 / 31 / 18 (MM/DD/YY)

A. Emission Unit Description: 40.5 MMBtu/Hr Sur-Lite Model Sacramento Landfill Gas Flare			B. Pollutant: NMOC
C. Measured Emission Rate: 0.537 ppm 0.0491 lb/hr	D. Limited Emission Rate: 20 ppm 1.59 lb/hr	E. Specific Source Test or Monitoring Record Citation: Modified EPA Method 25	F. Test Date: June 5-6, 2018

A. Emission Unit Description: 40.5 MMBtu/Hr Sur-Lite Model Sacramento Landfill Gas Flare			B. Pollutant: NO <sub>x</sub>
C. Measured Emission Rate: 1.36 lb/hr 0.0427 lb/MMBtu	D. Limited Emission Rate: 2.43 lb/hr 0.06 lb/MMBtu	E. Specific Source Test or Monitoring Record Citation: EPA Method 7E	F. Test Date: June 5-6, 2018

A. Emission Unit Description: 40.5 MMBtu/Hr Sur-Lite Model Sacramento Landfill Gas Flare			B. Pollutant: CO
C. Measured Emission Rate: 0.462 lb/hr 0.0152 lb/MMBtu	D. Limited Emission Rate: 8.1 lbs/hr 0.2 lb/MMBtu	E. Specific Source Test or Monitoring Record Citation: EPA Method 10	F. Test Date: June 5-6, 2018

A. Emission Unit Description: 40.5 MMBtu/Hr Sur-Lite Model Sacramento Landfill Gas Flare			B. Pollutant: SO <sub>x</sub>
C. Measured Emission Rate: 0.073 lb/hr (as SO <sub>2</sub> ) 0.0024 lb/MMBtu (as SO <sub>2</sub> )	D. Limited Emission Rate: 0.41 lb/hr (as SO <sub>2</sub> ) 0.02 lb/MMBtu (as SO <sub>4</sub> )	E. Specific Source Test or Monitoring Record Citation: Modified SCAQMD 307-91	F. Test Date: June 5-6, 2018

A. Emission Unit Description: 40.5 MMBtu/Hr Sur-Lite Model Sacramento Landfill Gas Flare			B. Pollutant: Destruction Eff.%
C. Measured Emission Rate: NMOC 94.4%, or 0.537 ppm MDE: 99.987 %	D. Limited Emission Rate: NMOC 98%, or 20 ppm MDE: 99 %	E. Specific Source Test or Monitoring Record Citation: Modified EPA Method 25	F. Test Date: June 5-6, 2018

**Table 2-1**  
**Summary of Results - Criteria Pollutants**  
**Ventura Regional Sanitation District**  
**Coastal Landfill Flare**  
**June 5, 2018**

Run	1	2	3	Average	Permit Limit
Oxygen, %	15.86	15.15	14.38	15.13	
Carbon Dioxide, %	3.99	4.61	5.30	4.63	
Flow Rate, dscfm	17,497	19,930	20,170	19,199	
<b>Oxides of Nitrogen,</b>					
ppm	7.94	9.77	11.75	9.82	
ppm @ 3% O <sub>2</sub>	28.2	30.4	32.2	30.3	
lb/hr	0.996	1.40	1.699	1.36	2.43
lb/MMBtu	0.0398	0.0429	0.0455	0.0427	0.06
<b>Carbon Monoxide,</b>					
ppm	6.71	< 5.0	< 5.0	5.6	
ppm @ 3% O <sub>2</sub>	23.8	< 15.6	< 13.7	17.7	
lb/hr	0.512	< 0.435	< 0.440	0.462	8.10
lb/MMBtu	0.0205	< 0.0134	< 0.0118	0.0152	0.2
<b>Total Non-Methane/Non-Ethane Hydrocarbons (Outlet),</b>					
ppm	1.05	1.00	1.03	1.03	
ppm, C <sub>6</sub> @ 3% O <sub>2</sub>	0.621	0.519	0.471	0.537	20
lb/hr	0.0458	0.0497	0.0518	0.0491	1.59
lb/MMBtu	0.00183	0.00153	0.00139	0.00158	
<b>Total Non-Methane/Non-Ethane Hydrocarbons (Inlet),</b>					
ppm	543	653	681	626	
lb/hr	0.770	0.912	0.959	0.881	
lb/MMBtu	0.946	1.00	0.917	0.953	
<b>Total Non-Methane Hydrocarbon Destruction Efficiency,</b>					
Percent	94.1	94.5	94.6	94.4	98
<b>Methane (Outlet),</b>					
ppm	2.12	< 1	< 1	< 1.4	
lb/hr	0.0924	< 0.0496	< 0.0502	< 0.064	
<b>Methane (Inlet),</b>					
ppm	328000	341000	357000	342000	
lb/hr	465	476	502	481	
<b>Methane Destruction Efficiency,</b>					
Percent	99.980	> 99.990	> 99.990	> 99.987	99
<b>Total Reduced Sulfur (TRS) Compounds,</b>					
Hydrogen Sulfide, ppm	12.1	12.7	13.1	12.6	
TRS, ppm	12.5	13.1	13.5	13.0	
<b>Oxides of Sulfur,</b>					
lb/hr	0.071	0.073	0.076	0.073	0.41
lb/MMBtu	0.0028	0.0022	0.0020	0.0024	0.02
<b>Operating Parameters,</b>					
Fuel Flow, scfm	569	560	565	565	
Flare Temperature, °F	1,497	1,498	1,501	1,499	



**ATTACHMENT 4**

**SUPPLEMENTAL INFORMATION HISTORICALLY SUBMITTED WITH TITLE V REPORTS**

**Oxnard Landfills  
2018  
Monthly Throughput**

<i>Month</i>	<i>LFG scf</i>	<i>HHV</i>	<i>CH4 Average</i>
Jul	25,387,081	335	33.1
Aug	24,622,508	344	34.0
Sep	21,403,117	352	34.8
Oct	21,968,886	348	34.4
Nov	28,543,141	368	36.4
Dec	31,924,654	348	34.4

<i>Blower Hours</i>	
<i>Blower 1</i>	<i>Blower 2</i>
0	744
565	175
388	309
525	182
0	721
659	84
<b>2,137</b>	<b>2,215</b>

	<i>Total LFG</i>	<i>Average HHV</i>	<i>MMbtu</i>
2018	153,849,387	342	52,587