VENTURA REGIONAL SANITATION DISTRICT
4105 WEST GONZALES ROAD, OXNARD, CA 93036-2748
A Public Waste Management Agency

February 14, 2025

Mr. Keith Macias
Manager, Compliance Division
Ventura County Air Pollution Control District
4567 Telephone Road, 2nd Floor
Ventura, CA 93003

SUBJECT: TITLE V COMPLIANCE REPORTS FOR THE OXNARD LANDFILLS

Mr. Macias:

The Ventura Regional Sanitation District (VRSD) submits the attached Title V compliance reports for the Oxnard Landfills, 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), National Emissions Standard for Hazardous Air Pollutants (NESHAP), and Title V Report for July 1, 2024 to December 31, 2024;
2. Annual Title V Compliance Certification for January 1 to December 31, 2024; and

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

Attachment 2 includes the Annual Title V Compliance Certification. Attachment 2 also includes the Permit Attachment Form, Annual Deviation Summary Form, and Flare Source Test Summary Form.

Attachment 3 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 Semi-Annual Monitoring Report. This attachment includes the monthly landfill throughputs. The annual opacity form was submitted in the first semi-annual 2024 report.

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 Landfills' Title V Permit, the approved California state plan for the EG, which includes compliance with the AB 32 Landfill

Methane Rule (LMR) and specific portions of 40 CFR Part 62 Subpart OOO, and the NESHAP for municipal solid waste landfills (40 CFR Part 63, Subpart AAAA).

If you have any questions or require additional information, please contact me at (805) 658-4679 or Edward Pettit at (805) 207-2218.

Sincerely,

Richard Jones
Director of Operations
Ventura Regional Sanitation District

Attachments

1. Semi-Annual EG/NESHAP/Title V Report for July 1 to December 31, 2024
2. Annual Title V Compliance Certification for January 1 to December 31, 2024
3. Supplemental Information Historically Submitted with Title V Reports

Copy: United States Environmental Protection Agency, Region IX

ATTACHMENT 1

SEMI-ANNUAL EG/NESHAP/TITLE V REPORT

Second Semi-Annual 2024 Title V Report and Emissions Guidelines (EG)/National Emission Standards for Hazardous Air Pollutants (NESHAP) Report
Oxnard Landfills
Oxnard, California

From:
Ventura Regional Sanitation District
4105 W. Gonzales Road
Oxnard, California 93036

For Submittal to:

Ventura County Air Pollution Control District
4567 Telephone Road, 2nd Floor
Ventura, California 93003
(805) 303-4005

February 15, 2025

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:

Ed Swede
Air Quality Engineer
Ventura County Air Pollution Control District
4567 Telephone Road
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: Richard Jones Director of Operations	Date: 2/13/25

Time Period Covered by the Semi-Annual Report of Required Monitoring:

07/01/2024 to 12/31/2024

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:

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Signature and Title of Responsible Official: Title: Richard Jones Director of Operations	Date:

Time Period Covered by the Semi-Annual Report of Required Monitoring:

07/01/2024 to 12/31/2024

Table of Contents

Section **Page**

List of Tables

No.

Appendices

1.0 INTRODUCTION

This semi-annual Title V, New Source Performance Standards (NSPS) (Emissions Guidelines (EG))/ National Emission Standards for Hazardous Air Pollutants (NESHAP) 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:

- Portions of 40 Code of Federal Regulations (CFR) Part 62, Subpart OOO ("Federal Plan") as of June 21, 2021
- In compliance with 40 CFR 63, Subpart AAAA (NESHAP) for Landfills), the NSPS annual report is submitted semi-annually
- Revised 40 CFR 63, Subpart AAAA (NESHAP) as of September 27, 2021
- To fulfill the semi-annual reporting requirement under the facility's Title V permit (No. 01399)

1.1 NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS NOTES AND OBJECTIONS TO SEMI-ANNUAL REPORT SUBMITTAL

VRSD submits this semi-annual report covering the reporting period from July 1 to December 31, 2024 (the "Report") in accordance with the provisions of 40 CFR Part 63, Subpart AAAA, the Landfill NESHAP. The Report consists of the CEDRI electronic file report, using Version 2.0, and the accompanying pdf narrative report form attached thereto. VRSD's submittal of the Report, and its Certification thereof, is made subject to the notes and objections set forth herein.

The elements of semi-annual reporting required pursuant to the Landfill NESHAP are set forth at 40 CFR §63.1981(h). As required by 40 CFR §63.1981(l)(2), VRSD has utilized the electronic file reporting format established by the United States Environmental Protection Agency (EPA) and made available via its CEDRI website. However, certain aspects of the CEDRI electronic file are inconsistent with, or more expansive than, the Landfill NESHAP. Accordingly, VRSD preserves and does not waive any objection it may have to the propriety, completeness or accuracy of the CEDRI reporting format or its consistency with the requirements of the Landfill NESHAP. Specifically, VRSD objects to the CEDRI electronic file reporting format to the extent that it purports to require the submittal of information that is not required to be maintained or submitted pursuant to the Landfill NESHAP, requires information to be reported in a format in which it would not otherwise be maintained, or renders such information inaccurate or incomplete. VRSD further objects to the CEDRI electronic file reporting format to the extent that it fails to include or require the inclusion of information otherwise required to be submitted pursuant to the Landfill NESHAP.

In furtherance of its preparation of the Report using the CEDRI electronic file reporting format, VRSD identifies the following specific notes and objections:

- There is an error in the "Number of Exceedances" tab of the CEDRI electronic file report: in this tab, the spreadsheet does not correctly calculate the number of exceedances due to an error in the formula embedded in the spreadsheet.

- There is a limitation in the number of entries that may be included in each tab of the CEDRI spreadsheet because each tab is locked and limited to 476 rows. This limit may preclude the inclusion of all relevant information within the electronic file report.

- There is no place to add the concentration value as required by the rulemaking. This precludes the inclusion of all relevant information within the electronic file report.

- The CEDRI electronic file purports to incorporate several elements of the general provisions of 40 CFR Subpart 63, Subpart A, which are not applicable. For example, the electronic file refers to "CMS" in several locations. VRSD has included information about enclosed flare temperature monitoring in these sections, where appropriate, and as relevant to the operating requirements set forth at 40 CFR §63.1983(c). However, the type of temperature monitoring equipment used at municipal solid waste landfills (thermocouples) are not typically required to meet the full set of requirements for more traditional continuous monitoring systems as set forth in Subpart A, such as equipment manufacturer, model number and calibration or certification information. Further, such information is not required to be maintained under the Landfill NESHAP and therefore is neither feasible nor required to be included within the Report. See, Table 1 to the Landfill NESHAP, which indicates that "Additional recordkeeping for sources with CMS" requirements under 40 CFR §63.10(c) are not applicable to this sector. Accordingly, in completing the Report, VRSD has completed only those fields in the CEDRI electronic file where applicable and/or otherwise appropriate.

- While the CEDRI electronic file format contains operating information required to be submitted under the Landfill NESHAP as set forth at 40 CFR §63.1981(h), it is VRSD's understanding that the certification and deviation requirements, as set forth in the "Certification" and "Deviation" tabs of the CEDRI spreadsheet, are applicable only to CMS systems at the affected facility, and do not apply to the other operational and compliance information required pursuant to the Landfill NESHAP.

- In the "exceedances" tab of the CEDRI electronic file, the duration of reported exceedances auto-calculates to hours. However, the nature of the Landfill NESHAP operational requirements, and the timing requirements for corrective action of initial monitored exceedances, would instead dictate that the duration of these events should be reported in days; VRSD has submitted this information consistent with these requirements.

Submission of this Report and the information contained herein should not be construed as a waiver of any objection which VRSD may have to the legal propriety of the agency's requiring or using information submitted in the Report to assess VRSD's compliance status and any such objections are hereby reserved regardless of whether a specific objection is identified herein.

1.2 EMISSION GUIDELINE CF RULE

OLF is considered an "existing" landfill under the original landfill NSPS, and as such was subject to VCAPCD Rule 74.17.1, and is considered an "existing" landfill under the new Emissions Guideline (EG) rule, promulgated under 40 CFR Part 60, Subpart Cf in August 2016. The California Air Resources Board (CARB) submitted a State Plan, dated May 25, 2017, to implement the EPA's EG rule. CARB's State Plan claimed that the California AB 32 Landfill Methane Rule (LMR), which OLF is already subject to, is already

more stringent than the EG rule, and that compliance with the LMR should be sufficient to comply with the EG rule. The EPA partially approved and partially disapproved CARB's State Plan on January 9, 2020 because CARB's State Plan did not fully meet certain provisions of the EG rule. EPA published its Federal Plan for the EG under 40 CFR Part 62, Subpart OOO in May 2021, and it became effective on June 21, 2021. At that time, the approved EG Cf rule in California became the LMR plus specific sections of Subpart OOO related to wellhead temperature and corrective action. OLF has continued to comply with the California EG rule since June 2021.

1.3 UPDATED NESHAP 40 CFR 63, SUBPART AAAA

Due to the site's permitted design capacity being over the 2.5 million Megagram/2.5 million cubic meter limits and having an uncontrolled non-methane organic compound (NMOC) content exceeding 50 Megagrams per year, OLF is subject to the landfill NESHAP under 40 CFR Part 63, Subpart AAAA. Landfills subject to Subpart AAAA can choose to comply with Subpart AAAA in lieu of the major compliance provisions of Subpart WWW and OOO, as of September 27, 2021. The new NESHAP rule also removed the Startup, Shutdown, Malfunction (SSM) Plan requirements that were in the previous rule. Note that the facility is complying with the relevant major compliance provisions of Subpart OOO by choosing to comply with the equivalent sections under Subpart AAAA as allowed. Note that per a June 24, 2021 email from the VCAPCD, it is the District's policy to enforce the current regulations. Therefore, although the Title V Permit references Subpart WWW, the facility does not have to comply with the outdated regulations. This includes VCAPCD Rule 74.17.1, which references the NSPS Subpart WWW. In the past, it was interpreted that the landfills subject to Subpart AAAA can choose to comply with Subpart AAAA in lieu of the major compliance provisions of Subparts WWW and OOO, as of September 27, 2021. Please note, in accordance with the California Air Pollution Control Officers Association's (CAPCOA) October 2023 meeting and the EPA Region IX's updated guidance, the Site also complies with the portions of Subpart OOO that are applicable to the CA State Plan for EG sites, which includes 40 CFR Part 62.16716(c), wellhead temperature of 55 degrees Celsius (ºC) (131 Fahrenheit (ºF)).

For the reporting period from July 1, 2024 through December 31, 2024, this Semi-Annual Report complies with the sections specified in Subpart AAAA, 40 CFR 63.1981(h), which describes the items to be submitted in an annual report for landfills using an active collection system. Please note, as noted above, OLF is also complying with Subpart OOO, 40 CFR 62.16716(c). In accordance with NESHAP 40 CFR 63, Subpart AAAA, this report is submitted semi-annually.

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 intersection of the Santa Clara River and Victoria Avenue. 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/NESHAP

The following information in Table 1 is required to be reported in a semi-annual report:

Table 1. Reporting Requirements, Corresponding Regulatory References

Updated NESHAP Subpart AAAA
40 CFR 63.1981(h), (i), (j), (k), (l)
Number of times that applicable parameters monitored under 40 CFR 63.1958(b), (c), and (d) were exceeded and when the gas collection and control system was not operating under 40 CFR 63.1958(e), including periods of SSM.
Description and duration of all periods when the gas stream was diverted from the control device or treatment system through a bypass line or the indication of bypass flow as specified under 40 CFR 63.1961.
Description and duration of all periods when the control device or treatment system was not operating and length of time the control device or treatment system was not operating.
All periods when the collection system was not operating.
The location of each exceedance of the 500-ppm methane concentration as provided in 40 CFR 63.1958(d) 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 pursuant to 40 CFR 63.1960(a)(3) and (4), (b), and (c)(4).
Required information of the initial performance source test report pursuant to 40 CFR 63.1981(i).
For any corrective action analysis for which corrective actions are required in 40 CFR 63.1960(a)(3)(i) or (a)(5) and that take more than 60 days to correct the exceedance, the root cause analysis conducted.
Each owner or operator required to conduct enhanced monitoring in 40 CFR 63.1961(a)(5) and (6) must include the results of all monitoring activities conducted during the period.
Where an owner or operator subject to the provisions of subpart 40 CFR 63.1981(k) seeks to demonstrate compliance with the operational standard for temperature in § 63.1958(c)(1) and a landfill gas temperature measured at either the wellhead or at any point in the well is greater than or equal to 76.7 degrees Celsius (170 degrees Fahrenheit) and the carbon monoxide concentration measured is greater than or equal to 1,000 ppmv, then you must report the date, time, well identifier, temperature and carbon monoxide reading via email to the Administrator within 24 hours of the measurement.
Beginning no later than September 27, 2021, the owner or operator must submit reports electronically according to paragraphs 40 CFR 63.1981(l)(1) and (2) of this section.
--
Submit semi-annual CMS summary reports including required items listed in 40 CFR 63.10(e)(3)(vi)

The following information required to be submitted in the NSPS/NESHAP semi-annual report is organized below as follows:

- 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 and Collection System Downtime
- Surface Emissions Monitoring Data
    - Annual Monitoring
- Cover Integrity Monitoring
- Gas Collection System Installations and Upgrades
- Performance Testing
    - Source Test Results
- 24-Hour High Temperature
- CMS Summary Report
- Title V Compliance

3.1 MONITORED PARAMETERS

The following information in Table 2 is required to be monitored:

Table 2. Monitored Parameters, Corresponding Regulatory References

Updated NESHAP Subpart AAAA	Subpart OOO
40 CFR 63.1961(a), (b), (f)	**40 CFR 62.16722(a)(3)**
Vacuum applied to the extraction wells via the gas collection header is monitored on a monthly basis. A vacuum must be maintained at each wellhead to be in compliance with 40 CFR 63.1961 (a)(1).	--
Nitrogen or oxygen content of LFG at the wellheads is monitored on a monthly basis.	--
Temperature of the LFG at the wellheads is monitored on a monthly basis. Temperature must be maintained below 62.8 degrees C (145 degrees F) to comply with 40 CFR 63.1961(a)(3).	Monitor temperature of the landfill gas on a monthly basis as provided in § 62.16720(a)(4). The temperature measuring device must be calibrated annually using the procedure in 40 CFR part 60, appendix A–1, EPA Method 2, section 10.3. (Please note, 62.16720(a)(4) references 62.16716(c), which states temperature must be less than 55 degrees C (131 degrees F).
A temperature or flame presence monitoring device with a	--

Updated NESHAP Subpart AAAA	Subpart OOO
40 CFR 63.1961(a), (b), (f)	**40 CFR 62.16722(a)(3)**
continuous recorder, and a gas flow rate measuring device, which records flow at least once every 15 minutes, must be installed at the flare station. The temperature/flame presence and LFG flow rate monitoring data are used to determine the amount of time the LFG collection and control systems are on-line and to ensure compliance with the minimum temperature requirement for enclosed flares. The flare monitoring devices must be operating continuously to comply with 40 CFR 63.1961(b) and to show that the flare is on-line at any time that the collection system is operating (in compliance with 40 CFR 63.1958 (e) and (f)).	
Landfill surface emissions monitoring was performed on a quarterly basis to measure concentrations of TOC as methane. A portable FID organic vapor analyzer, which meets NSPS specifications, was used to measure concentrations of TOC as methane (in compliance with 40 CFR 63.1961(f)).	--
The landfill surface was inspected at least monthly for evidence of cracks or other surface integrity issues, in accordance with 40 CFR 63.1960(c)(5).	--
Per 40 CFR 63.1983(c)(1)(i), the average temperature of the flare for a 3-hour time period cannot fall below 28°C (82°F) less than the average operation temperature based on the most recent source test. Please note, continuous monitoring of temperature monitoring is required at all times except for periods of monitoring system malfunctions, repairs associated with monitoring system malfunctions, and required monitoring system quality assurance or quality control activities (in compliance with 40 CFR 63.1961(h)).	--

3.1.1 Wellhead Monitoring Data

Wellhead monitoring data from the monthly monitoring events during the reporting period included wellhead vacuum and the temperature of LFG at the wellheads. Please note that wellhead oxygen was monitored on a monthly basis; however, under the revised NESHAP Subpart AAAA regulations, there is no longer a well oxygen limit. These data provide the following information regarding compliance with 40 CFR 63.1961 and 40 CFR 62.16716(c):

- During the reporting period, all operation of extraction wells had negative pressure, during all monitoring events except for one (1) well. On October 14, 2024, well VC-20 had a pressure of 0.3 inches water column ("w.c.). Per 40 CFR 63.1960(a)(3), corrective action was initiated within five days (through valve adjustments increasing vacuum) and re-monitoring was performed, and the well was corrected within 15 days. On October 14, 2024, well VC-20 had a pressure of -0.48 "w.c.

- During the reporting period, all wells were operated with LFG temperatures less than 55 degrees C (131 degrees F), during all monitoring events.

Wellhead readings for wells that were off-line due to maintenance, active filling or on-site construction activities; and/or shut-off to control increased well temperature to prevent a subsurface fire, were excluded from the above review. 40 CFR 63.1981(j) requires notifications for corrective action that will exceed 60 days to implement. Such corrective actions also require a "root cause analysis" to determine the reason for the exceedance if exceedances cannot be corrected in 15 days. For corrective actions that require more than 60 days to complete, an additional "corrective action analysis" is also required. Please note, in accordance with 40 CFR 62.16724(k), these notifications are applicable to temperature exceedances of 131 degrees F. There were no exceedances during the reporting period for pressure or temperature that could not be corrected within 15 days; therefore, no corrective actions or root cause analyses to report.

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 control or treatment system at all times when the collected gas is routed to the system (CFR 63.1958(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. Note that the flare was approved to operate less than continuously due to reduced LFG generation and starting October 8, 2024 operated on a timer for 12 hours daily.

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

Compliance source testing for 2023 was performed on June 8, 2023 and the source test report was submitted on July 18, 2023 with a temperature of 1,650 degrees F. During the reporting period from July 1 through July 9, 2024, the minimum temperature at which the flare should operate was 1,600 degrees F (1,650 degrees F – 50 degrees F).

Compliance source testing for 2024 was performed on June 5, 2024 and the source test report was submitted on July 10, 2024 with a temperature of 1,655 degrees F. During the reporting period from July 10 through December 31, 2024, the minimum temperature at which the flare should operate was 1,605 degrees F (1,655 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. Note that the permitted minimum temperature for the flare is 1,100 degrees F, which is below the minimum under the NSPS/NESHAP. The NESHAP minimum temperature is no more than 82 degrees F below the more recent source test but is 50 degrees F per the LMR.

During the reporting period, the average temperature for the flare did not drop below the minimum temperatures during operation. Missing or invalid data can potentially be a deviation for the temperature monitoring requirement for the flare if one or more hours of data in a 3-hour block is missing or invalid as

defined by having more than 15 minutes of invalid or missing data in an hour. There were zero (0) missing data events for the flare during the reporting period, except for periods excluded per 40 CFR 63.1961.

3.1.5 Control System and Collection 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 is shut down. If this occurs, all exit valves automatically shut and LFG would not be vented to the atmosphere.

Blower/flare station shutdowns occurred at various times during the reporting period of July 1 through December 31, 2024 due to, but not limited to, the following reasons:

- Flame loss
- Low flow
- Planned downtime for less than continuous operation

Collected LFG was at no time diverted from the flare because the blower automatically shuts down whenever the flare shuts down. Therefore, at no time was the collected LFG emitted without combustion during the reporting period. Also, in no instances did free venting of LFG occur during the reporting period. Individual flare station shutdowns (and subsequently collection system shutdowns) during the reporting period are included in Table 3. Note the flare was scheduled to operate on a timer for 12 hours per day starting in October 2024. Per 40 CFR 63.1955(c), the equipment was operated in a manner consistent with safety and good air pollution control practices for minimizing emissions, and the work practice standard was met.

Table 3. Summary of Flare Downtime from July 1 through December 31, 2024

Control System Periods of Downtime		
Date	**Duration (Hrs)**	**Reason for Shutdown**
7/18/24	0.12	Flare shutdown due to blower vibration
8/3/24	0.63	Flare shutdown due to blower vibration
10/3/24	1.07	Flare shutdown due to flame loss
10/3/24	0.07	Flare shutdown due to flame loss
10/3/24	0.33	Flare shutdown due to flame loss
10/4/24	0.13	Flare shutdown due to low temperature
10/8/24	12.07	Flare planned shutdown due to timer (less than continuous operation)
10/9/24	12.07	Flare planned shutdown due to timer (less than continuous operation)
10/10/24	12.07	Flare planned shutdown due to timer (less than continuous operation)
10/11/24	12.07	Flare planned shutdown due to timer (less than continuous operation)
10/12/24	12.07	Flare planned shutdown due to timer (less than continuous operation)
10/13/24	12.07	Flare planned shutdown due to timer (less than continuous operation)
10/14/24	12.07	Flare planned shutdown due to timer (less than continuous operation)
10/15/24	12.07	Flare planned shutdown due to timer (less than continuous operation)
10/16/24	0.10	Flare shutdown due to low flow/low temperature

Control System Periods of Downtime		
Date	Duration (Hrs)	Reason for Shutdown
10/16/24	10.07	Flare planned shutdown due to timer (less than continuous operation)
10/17/24	12.07	Flare planned shutdown due to timer (less than continuous operation)
10/18/24	12.07	Flare planned shutdown due to timer (less than continuous operation)
10/19/24	0.45	Flare shutdown due to low flow/low temperature
10/19/24	0.73	Flare shutdown due to low flow/low temperature
10/20/24	0.13	Flare shutdown due to low flow
10/20/24	0.10	Flare shutdown due to low flow
10/22/24	12.07	Flare planned shutdown due to timer (less than continuous operation)
10/23/24	12.07	Flare planned shutdown due to timer (less than continuous operation)
10/24/24	12.07	Flare planned shutdown due to timer (less than continuous operation)
10/25/24	12.07	Flare planned shutdown due to timer (less than continuous operation)
10/26/24	12.07	Flare planned shutdown due to timer (less than continuous operation)
10/27/24	8.05	Flare planned shutdown due to timer (less than continuous operation)
10/28/24	11.77	Flare planned shutdown due to timer (less than continuous operation)
10/29/24	0.15	Flare shutdown due to low flow
10/29/24	0.10	Flare shutdown due to low flow
10/29/24	10.07	Flare planned shutdown due to timer (less than continuous operation)
10/30/24	10.07	Flare planned shutdown due to timer (less than continuous operation)
10/31/24	10.07	Flare planned shutdown due to timer (less than continuous operation)
11/1/24	0.62	Flare shutdown due to low flow
11/1/24	10.07	Flare planned shutdown due to timer (less than continuous operation)
11/2/24	9.07	Flare planned shutdown due to timer (less than continuous operation)
11/3/24	10.03	Flare planned shutdown due to timer (less than continuous operation)
11/4/24	1.07	Flare shutdown due to low flow
11/4/24	11.03	Flare planned shutdown due to timer (less than continuous operation)
11/5/24	11.05	Flare planned shutdown due to timer (less than continuous operation)
11/6/24	0.13	Flare shutdown due to low flow
11/6/24	11.07	Flare planned shutdown due to timer (less than continuous operation)
11/7/24	0.68	Flare shutdown due to low flow
11/7/24	2.05	Flare shutdown due to high temperature
11/7/24	1.67	Flare shutdown due to low flow
11/7/24	6.78	Flare planned shutdown due to timer (less than continuous operation)
11/8/24	11.03	Flare planned shutdown due to timer (less than continuous operation)
11/9/24	11.03	Flare planned shutdown due to timer (less than continuous operation)
11/10/24	11.03	Flare planned shutdown due to timer (less than continuous operation)
11/11/24	11.03	Flare planned shutdown due to timer (less than continuous operation)
11/12/24	5.23	Flare planned shutdown due to timer (less than continuous operation)
11/13/24	5.07	Flare planned shutdown due to timer (less than continuous operation)
11/14/24	6.58	Flare planned shutdown due to timer (less than continuous operation)
11/15/24	5.57	Flare planned shutdown due to timer (less than continuous operation)

Control System Periods of Downtime		
Date	Duration (Hrs)	Reason for Shutdown
11/16/24	6.28	Flare planned shutdown due to timer (less than continuous operation)
11/17/24	6.18	Flare planned shutdown due to timer (less than continuous operation)
11/18/24	8.03	Flare planned shutdown due to timer (less than continuous operation)
11/19/24	5.52	Flare planned shutdown due to timer (less than continuous operation)
11/20/24	5.05	Flare planned shutdown due to timer (less than continuous operation)
11/21/24	5.07	Flare planned shutdown due to timer (less than continuous operation)
11/22/24	5.72	Flare planned shutdown due to timer (less than continuous operation)
11/23/24	11.07	Flare planned shutdown due to timer (less than continuous operation)
11/24/24	11.07	Flare planned shutdown due to timer (less than continuous operation)
11/25/24	11.07	Flare planned shutdown due to timer (less than continuous operation)
11/26/24	11.07	Flare planned shutdown due to timer (less than continuous operation)
11/27/24	9.08	Flare planned shutdown due to timer (less than continuous operation)
11/28/24	11.07	Flare planned shutdown due to timer (less than continuous operation)
11/29/24	11.07	Flare planned shutdown due to timer (less than continuous operation)
11/30/24	11.07	Flare planned shutdown due to timer (less than continuous operation)
12/1/24	7.48	Flare planned shutdown due to timer (less than continuous operation)
12/2/24	8.72	Flare planned shutdown due to timer (less than continuous operation)
12/3/24	5.87	Flare planned shutdown due to timer (less than continuous operation)
12/4/24	11.05	Flare planned shutdown due to timer (less than continuous operation)
12/5/24	8.85	Flare planned shutdown due to timer (less than continuous operation)
12/6/24	11.05	Flare planned shutdown due to timer (less than continuous operation)
12/7/24	8.43	Flare planned shutdown due to timer (less than continuous operation)
12/8/24	11.05	Flare planned shutdown due to timer (less than continuous operation)
12/9/24	11.05	Flare planned shutdown due to timer (less than continuous operation)
12/10/24	0.92	Flare shutdown due to high oxygen
12/10/24	11.05	Flare planned shutdown due to timer (less than continuous operation)
12/11/24	5.65	Flare planned shutdown due to timer (less than continuous operation)
12/12/24	3.57	Flare shutdown due to low flow/high oxygen
12/12/24	6.50	Flare planned shutdown due to timer (less than continuous operation)
12/13/24	7.68	Flare planned shutdown due to timer (less than continuous operation)
12/14/24	3.30	Flare planned shutdown due to timer (less than continuous operation)
12/15/24	3.05	Flare planned shutdown due to timer (less than continuous operation)
12/16/24	9.05	Flare planned shutdown due to timer (less than continuous operation)
12/17/24	9.05	Flare planned shutdown due to timer (less than continuous operation)
12/18/24	9.05	Flare planned shutdown due to timer (less than continuous operation)
12/19/24	9.05	Flare planned shutdown due to timer (less than continuous operation)
12/20/24	7.52	Flare planned shutdown due to timer (less than continuous operation)
12/21/24	9.05	Flare planned shutdown due to timer (less than continuous operation)
12/22/24	9.05	Flare planned shutdown due to timer (less than continuous operation)
12/23/24	11.05	Flare planned shutdown due to timer (less than continuous operation)

Control System Periods of Downtime		
Date	Duration (Hrs)	Reason for Shutdown
12/24/24	11.05	Flare planned shutdown due to timer (less than continuous operation)
12/25/24	5.63	Flare planned shutdown due to timer (less than continuous operation)
12/26/24	11.07	Flare planned shutdown due to timer (less than continuous operation)
12/27/24	11.07	Flare planned shutdown due to timer (less than continuous operation)
12/28/24	11.07	Flare planned shutdown due to timer (less than continuous operation)
12/29/24	11.07	Flare planned shutdown due to timer (less than continuous operation)
12/30/24	11.07	Flare planned shutdown due to timer (less than continuous operation)
12/31/24	3.95	Flare planned shutdown due to timer (less than continuous operation)

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/NESHAP 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 63.1961(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 2024 annual instantaneous surface emissions monitoring event was performed by RES Environmental, Inc. (RES) at the landfills on the dates shown below:

- Bailard Landfill: September 4, 2024
- Coastal Landfill: October 28, 2024
- Santa Clara Landfill: October 31, 2024

The 2024 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/NESHAP 120-day timeline to implement a system expansion.

3.3 COVER INTEGRITY MONITORING

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, upgrades, or abandonments 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, 2024 and reported on July 10, 2024.

Performance test summary information on the NMOCs, NOx, SOx, and CO emissions for the flare is provided in Table 4 below.

Table 4. Summary of Source Test Results

Test Date	Parameter	Flare Result	Emission Limit
Flare 6/5/24	NOx Emission Rate (lb/MMBtu)	0.035	0.06 lb/MMBtu
	CO Emission Rate (lb/MMBtu)	0.048	0.20 lb/MMBtu
	SOx Emission Rate (lb/MMBtu)	0.004	0.02 lb/MMBtu
	NMOC Emission Rate (ppmv, as hexane @ 3% O_2)	<7.89	20 ppmv
	NMOC Destruction Efficiency (%)	99.37	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 also conducted on June 5, 2024. The methane destruction efficiency was 99.993%.

5.0 24-HOUR HIGH TEMPERATURE

40 CFR 63.1981(k) required the reporting of any landfill gas temperature measurements greater than or equal to 170°F. During the reporting period, there were no readings greater or equal to 170°F.

6.0 CMS SUMMARY REPORT

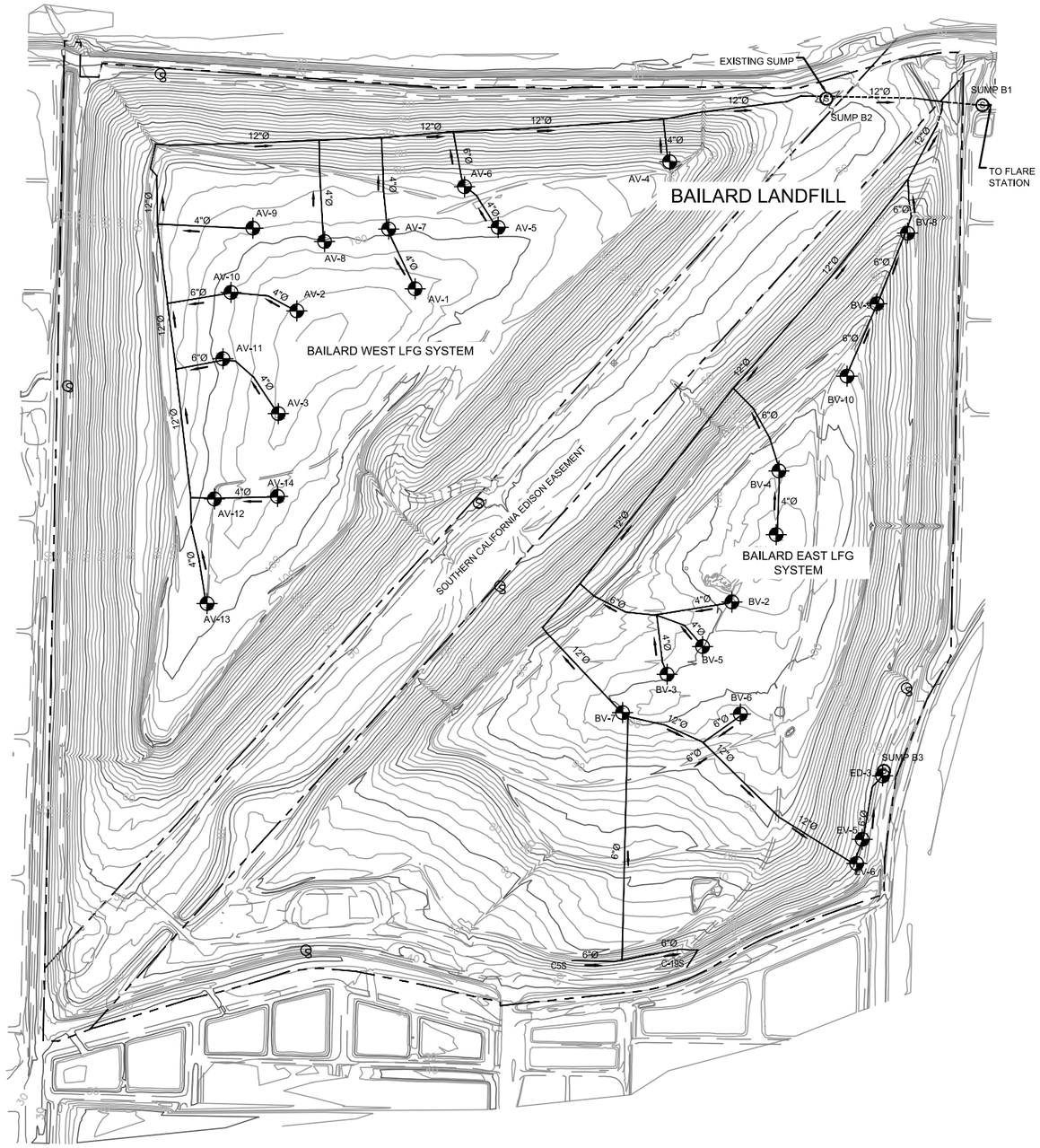
The additional reporting requirements for continuous monitoring systems (CMS) per 40 CFR 63.10(e)(3)(vi) is included in Appendix C.

7.0 TITLE V COMPLIANCE

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

APPENDIX A

LANDFILL SITE PLAN



N

S

0 200 400

GRAPHIC SCALE IN FEET

LEGEND

BV-6 LFG EXTRACTION WELL

ABOVE GRADE HDPE SDR 17 LFG PIPING

PROPERTY BOUNDARY/EASEMENT

(S) BELOW GRADE SUMPS

6"Ø HDPE PIPE DIA.

CONDENSATE FLOW DIRECTION ARROW

TOPOGRAPHY NOTE:
BASED ON SURVEY INFORMATION RECEIVED FROM VENTURA REGIONAL SANITATION DISTRICT DATE: 11-30-16.

ISSUED FOR PERMIT

REV	DATE	DESCRIPTION	DRN BY	DSN BY	CHK BY

CLIENT & OWNER: VENTURA REGIONAL SANITATION DISTRICT

3500 TOLAND RD,
SANTA PAULA, CA
PH: 805-658-4675

BIOGAS ENGINEERING
SIGNAL HILL, CA 90755
PH: (562) 726-3565
EMAIL: INFO@BIOGASENG.COM

BAILARD LANDFILL GCCS MAP

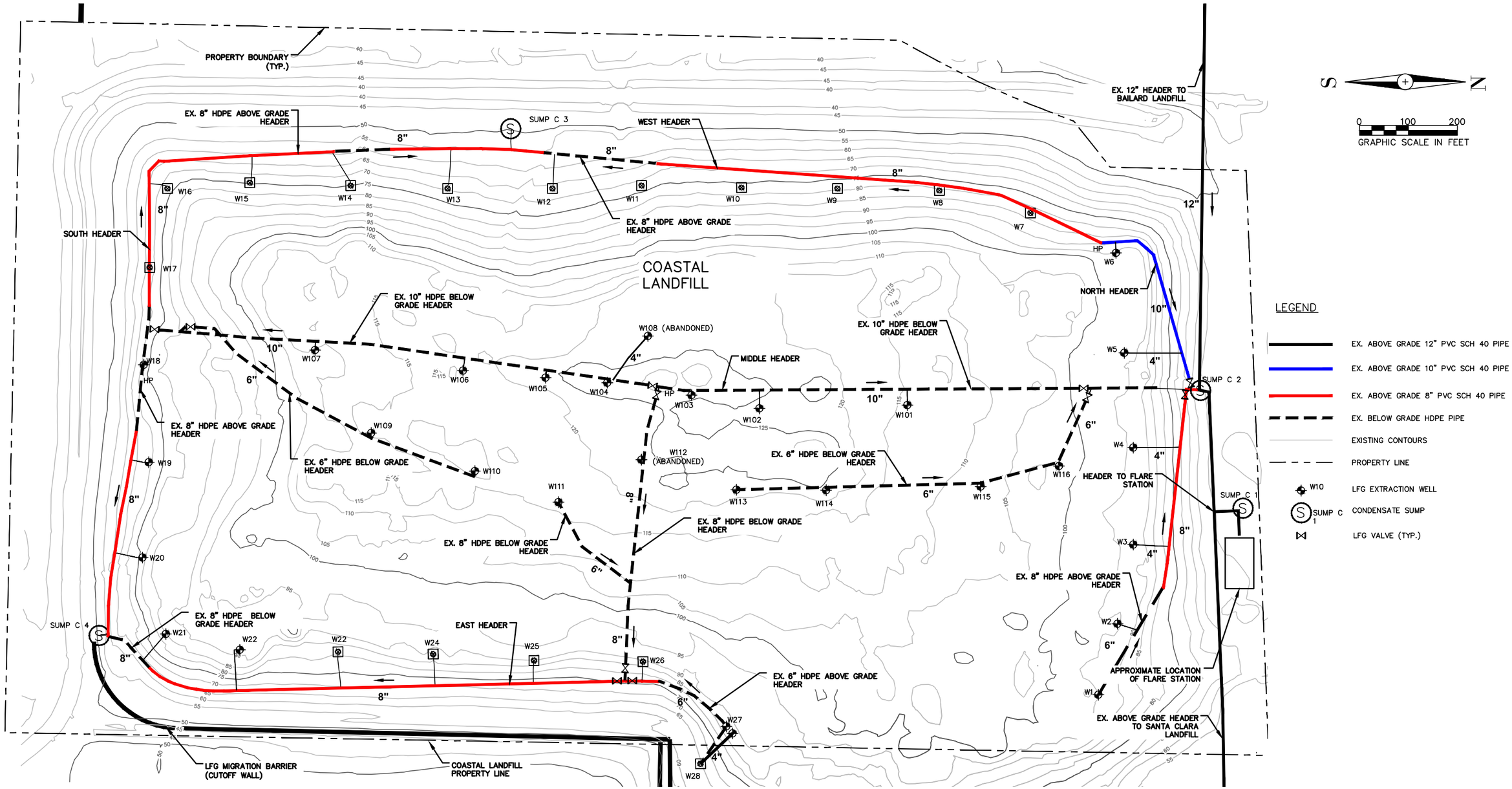
LFG GCCS MAP
COASTAL, SANTA CLARA AND
BAILARD LANDFILLS

DRAWING NO.

FIG.3

PROJECT NO.

\\Mac\Dropbox\Jobs\DEI\Bailard\FIGURES\FIGURE 3.dwg 4/30/17 gautamaroras



ISSUED FOR PERMIT

REV	DATE	DESCRIPTION	DRN BY	DSN BY	CHK BY

CLIENT & OWNER:

VENTURA REGIONAL SANITATION DISTRICT

3500 TOLAND RD,
SANTA PAULA, CA
PH: 805-658-4675

BIOGAS ENGINEERING
SIGNAL HILL, CA 90755
PH: (562) 726-3565
EMAIL: INFO@BIOGASENG.COM

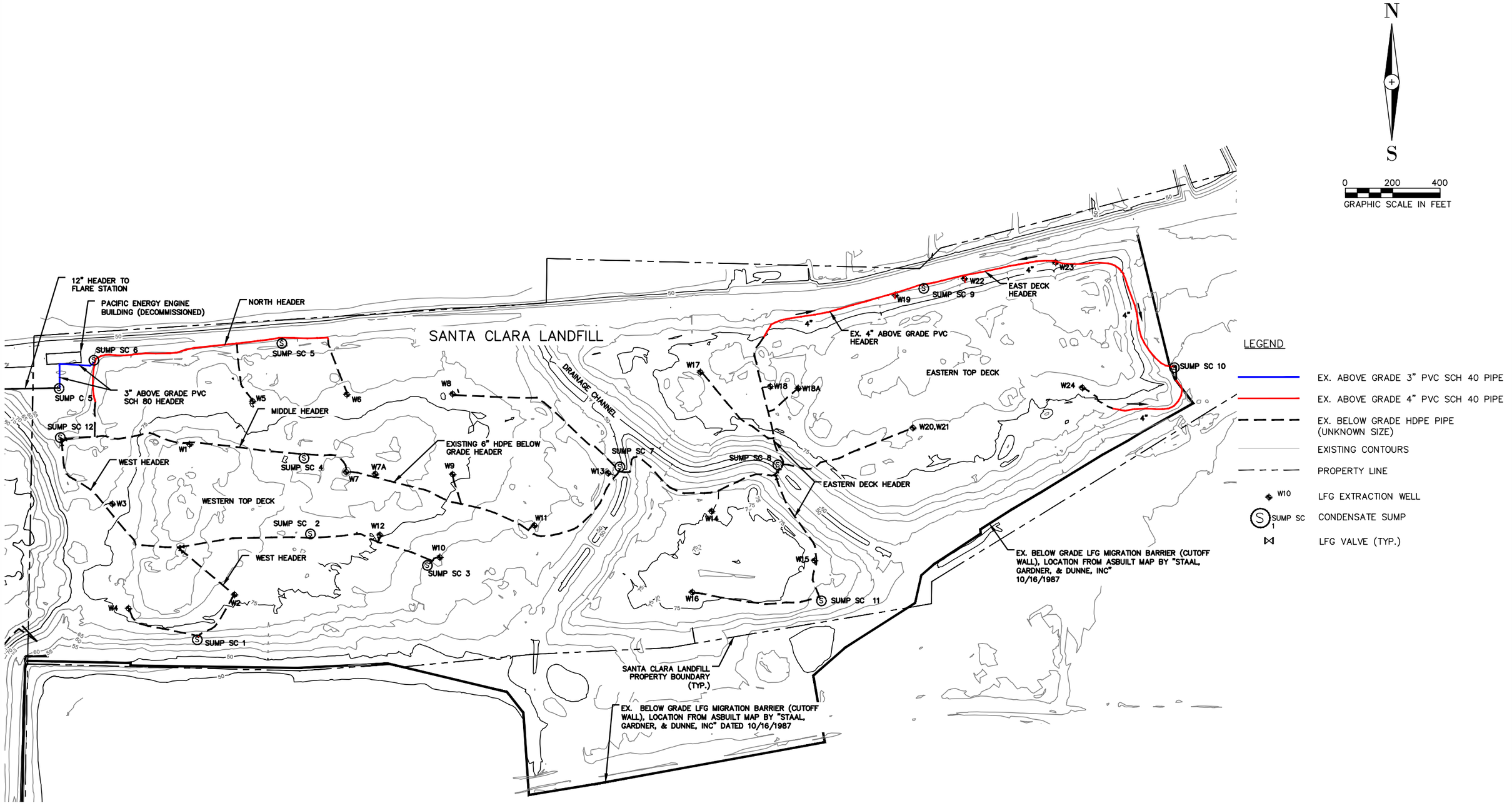
COASTAL LANDFILL GCCS MAP

LFG GCCS MAP
COASTAL, SANTA CLARA AND
BAILARD LANDFILLS

DRAWING NO.

FIG.4

PROJECT NO.



ISSUED FOR PERMIT

REV	DATE	DESCRIPTION	DRN BY	DSN BY	CHK BY

CLIENT & OWNER:

VENTURA REGIONAL SANITATION DISTRICT

3500 TOLAND RD,
SANTA PAULA, CA
PH: 805-658-4675

BIOGAS ENGINEERING
SIGNAL HILL, CA 90755
PH: (562) 726-3565
EMAIL: INFO@BIOGASENG.COM

SANTA CLARA LANDFILL GCCS MAP

LFG GCCS MAP
COASTAL, SANTA CLARA AND BAILARD LANDFILLS

DRAWING NO.
FIG.5
PROJECT NO.

APPENDIX B

COVER INTEGRITY MONITORING

INSPECTOR: Alan C. DATE: 07-24-2024

Bailard Landfill Cover Integrity			
	YES	NO	Location
Cracking surface		X	
Erosion rills		X	
Ponding water		X	
Exposed trash		X	

Corrective action		
Date	Location	Corrective action taken

INSPECTOR: Alan C. DATE: 08-22-2024

Bailard Landfill Cover Integrity			
	YES	NO	Location
Cracking surface		X	
Erosion rills		X	
Ponding water		X	
Exposed trash		X	

Corrective action		
Date	Location	Corrective action taken

INSPECTOR: Alan C. DATE: 09-23-2024

Bailard Landfill Cover Integrity			
	YES	NO	Location
Cracking surface		X	
Erosion rills		X	
Ponding water		X	
Exposed trash		X	

Corrective action		
Date	Location	Corrective action taken

INSPECTOR: Alan C. DATE: 10-31-2024

Bailard Landfill Cover Integrity			
	YES	NO	Location
Cracking surface		X	
Erosion rills		X	
Ponding water		X	
Exposed trash		X	

Corrective action		
Date	Location	Corrective action taken

INSPECTOR: Alan C. DATE: 11-25-2024

Bailard Landfill Cover Integrity			
	YES	NO	Location
Cracking surface		X	
Erosion rills		X	
Ponding water		X	
Exposed trash		X	

Corrective action		
Date	Location	Corrective action taken

INSPECTOR: Alan C. DATE: 12-23-2024

Bailard Landfill Cover Integrity			
	YES	NO	Location
Cracking surface		X	
Erosion rills		X	
Ponding water		X	
Exposed trash		X	

Corrective action		
Date	Location	Corrective action taken

INSPECTOR: Alan C. DATE: 07-23-2024

Coastal Landfill Cover Integrity			
	YES	NO	Location
Cracking surface		X	
Erosion rills		X	
Ponding water		X	
Exposed trash		X	

Corrective action		
Date	Location	Corrective action taken

INSPECTOR: Alan C. DATE: 08-26-2024

Coastal Landfill Cover Integrity			
	YES	NO	Location
Cracking surface		X	
Erosion rills		X	
Ponding water		X	
Exposed trash		X	

Corrective action		
Date	Location	Corrective action taken

INSPECTOR: Alan C. DATE: 09-24-2024

Coastal Landfill Cover Integrity			
	YES	NO	Location
Cracking surface		X	
Erosion rills		X	
Ponding water		X	
Exposed trash		X	

Corrective action		
Date	Location	Corrective action taken

INSPECTOR: Alan C. DATE: 10-15-2024

Coastal Landfill Cover Integrity			
	YES	NO	Location
Cracking surface		X	
Erosion rills		X	
Ponding water		X	
Exposed trash		X	

Corrective action		
Date	Location	Corrective action taken

INSPECTOR: Alan C. DATE: 11-27-2024

Coastal Landfill Cover Integrity			
	YES	NO	Location
Cracking surface		X	
Erosion rills		X	
Ponding water		X	
Exposed trash		X	

Corrective action		
Date	Location	Corrective action taken

INSPECTOR: Alan C. DATE: 12-19-2024

Coastal Landfill Cover Integrity			
	YES	NO	Location
Cracking surface		X	
Erosion rills		X	
Ponding water		X	
Exposed trash		X	

Corrective action		
Date	Location	Corrective action taken

INSPECTOR: Alan C. DATE: 07-23-2024

Santa Clara Landfill Cover Integrity			
	YES	NO	Location
Cracking surface		X	
Erosion rills		X	
Ponding water		X	
Exposed trash	X		Driving Range

Corrective action		
Date	Location	Corrective action taken
07-23-2024	Driving Range	Waiting for city of Oxnard to address issue
		*See below

*City conducted evaluation and determined that exposed trash was actually "flagging" or wind-blown litter, not originally buried waste. Landfill has adequate cover material.

INSPECTOR: Alan C. DATE: 08-26-2024

Santa Clara Landfill Cover Integrity			
	YES	NO	Location
Cracking surface		X	
Erosion rills		X	
Ponding water		X	
Exposed trash	X		Driving Range

Corrective action		
Date	Location	Corrective action taken
08-26-2024	Driving Range	Waiting for city of Oxnard to address issue
		*See below

*City conducted evaluation and determined that exposed trash was actually "flagging" or wind-blown litter, not originally buried waste. Landfill has adequate cover material.

INSPECTOR: Alan C. DATE: 09-23-2024

Santa Clara Landfill Cover Integrity			
	YES	NO	Location
Cracking surface		X	
Erosion rills		X	
Ponding water		X	
Exposed trash	X		Driving Range

Corrective action		
Date	Location	Corrective action taken
09-23-2024	Driving Range	Waiting for city of Oxnard to address issue
		*See below

*City conducted evaluation and determined that exposed trash was actually "flagging" or wind-blown litter, not originally buried waste. Landfill has adequate cover material.

INSPECTOR: Alan C. DATE: 10-25-2024

Santa Clara Landfill Cover Integrity			
	YES	NO	Location
Cracking surface		X	
Erosion rills		X	
Ponding water		X	
Exposed trash		X	Driving Range

Corrective action		
Date	Location	Corrective action taken
10-25-2024	Driving Range	City of Oxnard has addressed the issue*

*City conducted evaluation and determined that exposed trash was actually "flagging" or wind-blown litter, not originally buried waste. Landfill has adequate cover material.

INSPECTOR: Alan C. DATE: 11-27-2024

Santa Clara Landfill Cover Integrity			
	YES	NO	Location
Cracking surface		X	
Erosion rills		X	
Ponding water		X	
Exposed trash		X	

Corrective action		
Date	Location	Corrective action taken

INSPECTOR: Alan C. DATE: 12-20-2024

Santa Clara Landfill Cover Integrity			
	YES	NO	Location
Cracking surface		X	
Erosion rills		X	
Ponding water		X	
Exposed trash		X	

Corrective action		
Date	Location	Corrective action taken

APPENDIX C

NESHAP/CMS SUMMARY REPORT

SUMMARY REPORT – GASEOUS AND OPACITY EXCESS EMISSION AND CONTINUOUS MONITORING SYSTEM PERFORMANCE

The updated National Emission Standards for Hazardous Air Pollutants (NESHAP) Rule for Landfills (40 CFR 63 Subpart AAAA) was amended in March 2020. These amendments because effective September 27, 2021 and include additional reporting requirements for continuous monitoring systems (CMS) per §63.10(e)(3)(vi).

A. The company name and address of the affected source:

Oxnard Landfills
4105 W. Gonzales Road
Oxnard, California 93036

B. An identification of each hazardous air pollutant monitored at the affected source.

N/A. Subpart AAAA establishes a relevant emission standard for total non-methane organic compounds (NMOCs) and does not require hazardous air pollutant monitoring.

C. The beginning and ending dates of the reporting period.

The reporting period covers the period of July 1 – December 31, 2024.

D. A brief description of the process units.

The landfill gas collection and control system (GCCS) CMS components which are subject to the QC program and additional reporting requirements are:

- Enclosed flare(s) with thermocouples to measure combustion temperature
- Associated data recorder(s)

E. The emission and operating parameter limitations specified in the relevant standard(s).

Subpart AAAA establishes a relevant emission standard for non-methane organic compound (NMOC) emissions from enclosed flares of 98 percent weight-reduction or 20 parts per million by volume (ppmv) dry basis, as hexane at 3 percent oxygen. The monitoring requirement associated with this emission standard is established in §63.1983(b)(2) and requires that the landfill maintain records of monitoring of average combustion temperature measured at least every 15 minutes. Exceedances are established in §63.1983(c)(1) as all 3-hour periods of operation during which the average temperature was more than 28 degrees Celsius (82 degrees Fahrenheit) below the average combustion temperature during the most recent performance test at which compliance with the relevant emission standard of §63.1959(b)(2)(iii) was determined.

F. The monitoring equipment manufacturer(s) and model number(s).

- Thermocouples: Pyromation Thermostat P/N K8C-7-50-24-6D22-31

- Data Recorder: Sixth Sense Datagraph II P/N VG06-440-111-310

G. The date of the latest CMS certification or audit.

N/A. Per Table 1 to Subpart AAAA of Part 63, the CMS performance evaluation requirements of §63.8(e) do not apply to municipal solid waste (MSW) landfills.

H. The total operating time of the affected source during the reporting period.

During the reporting period (7/1/2024 – 12/31/2024) the GCCS operated a total of 3,602.31 hours.

I. An emission data summary (or similar summary if the owner or operator monitors control system parameters), including the total duration of excess emissions during the reporting period (recorded in minutes for opacity and hours for gases), the total duration of excess emissions expressed as a percent of the total source operating time during that reporting period, and a breakdown of the total duration of excess emissions during the reporting period into those that are due to startup/shutdown, control equipment problems, process problems, other known causes, and other unknown causes.

- There were no instances during the reporting period during which the average operational combustion temperature of the flare was measured to be less than 1,568 deg F from July 1 through July 9, 2024 and less than 1,573 deg F from July 10 through December 31, 2024 for at least 3 hours (i.e., 28 °C (82 °F) below the average combustion temperature measured for the enclosed flare during the most recent performance test).

J. A CMS performance summary (or similar summary if the owner or operator monitors control system parameters), including the total CMS downtime during the reporting period (recorded in minutes for opacity and hours for gases), the total duration of CMS downtime expressed as a percent of the total source operating time during that reporting period, and a breakdown of the total CMS downtime during the reporting period into periods that are due to monitoring equipment malfunctions, non-monitoring equipment malfunctions, quality assurance/quality control calibrations, other known causes, and other unknown causes.

During the reporting period, there were no instances where combustion temperature was not measured and recorded during flare operation as required.

K. A description of any changes in CMS, processes, or controls since the last reporting period.

No changes in applicable CMS, process, or controls occurred since the last reporting period.

L. The name, title, and signature of the responsible official who is certifying the accuracy of the report.

See Certification at beginning of report.

M. The date of the report.

See Cover Page.

ATTACHMENT 2

ANNUAL TITLE V COMPLIANCE CERTIFICATION

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION
SIGNATURE COVER FORM

TV Permit # 01399

A copy of each Annual Compliance Certification shall be submitted to EPA, Region 9, at the following address:

Ms. Roshni Brahmbhatt
Enforcement & Compliance Enforcement Division
EPA Region 9
75 Hawthorne Street
San Francisco, CA 94105

Confidentiality

All information in a Part 70 permit compliance certification is public information. The Part 70 permit is also public information.

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:	Date:
Title: Director of Operations	3/14/25

Time Period Covered by Compliance Certification

01 / 01 / 2024 (MM/DD/YY) to 12 / 31 / 2024 (MM/DD/YY)

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION
PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 24 (MM/DD/YY) to 12 / 31 / 24 (MM/DD/YY)

A. Attachment # or Permit Condition #: 40 CFR Part 62 Subpart OOO (Portions)	D. Frequency of monitoring:
B. Description: 40 CFR Part 62 Subpart OOO (Portions associated with State Plan for EG Sites)	Monthly E. Source test reference method, if applicable.
C. Method of monitoring: x Monitor wells (temperature)	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: 40CFR63AAAA	D. Frequency of monitoring:
B. Description: 40CFR Part 63, Subpart AAAA	Continuous, monthly, quarterly, annual, and bi-annually. E. Source test reference method, if applicable. See attached Source Test Summary Form
C. Method of monitoring: x Monitor flare gas flow rate and temperature x Monitor wells and collection header (temperature, pressure, nitrogen, oxygen – no limit). x Monitor methane concentration at the surface of the landfill x Maintain records control device and GCCS downtime	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: CARB CH4 from MSW	D. Frequency of monitoring:
B. Description: Title 17, CCR, Sections 95460 to 95476, Methane Emissions From MSW Landfills	Monthly, Quarterly, Annual E. Source test reference method, if applicable. See attached Source Test Summary Form
C. Method of monitoring: x Annual source testing to determine compliance with methane destruction efficiency x Quarterly landfill surface monitoring x Monthly monitoring of wells for pressure	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION
PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 24 (MM/DD/YY) to 12 / 31 / 24 (MM/DD/YY)

A. Attachment # or Permit Condition #: P01399PC1	D. Frequency of monitoring:
B. Description: Condition No. 1 – Rule 26 General Recordkeeping	Continuous
	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Monthly records of throughput and consumption	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: P01399PC1	D. Frequency of monitoring:
B. Description: Condition No. 2 – Rule 29 Solvent Recordkeeping	Annually
	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Maintain a list of exempt solvents.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: P01399PC2	D. Frequency of monitoring:
B. Description: Condition No. 1 – Rule 26 Annual Flare Combustion Limit The annual amount of landfill gas combusted in the flare shall not exceed 350,000 MMBtu per year.	Continuous
	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Landfill gas flow rate is recorded by a totalizer continuous temperature recording device and landfill gas flow totalizer	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION
PERMIT ATTACHMENT FORM

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

A. Attachment # or Permit Condition #: P01399PC2	D. Frequency of monitoring: Continuous
B. Description: Condition No. 3 – Rule 26, Flare BACT Limits	E. Source test reference method, if applicable. See attached Source Test Summary Form
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.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: P01399PC2	D. Frequency of monitoring: Continuous
B. Description: Condition No. 4 – Rule 54	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
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.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION
PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 24 (MM/DD/YY) to 12 / 31 / 24 (MM/DD/YY)

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

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

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

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION
PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 24 (MM/DD/YY) to 12 / 31 / 24 (MM/DD/YY)

A. Attachment # or Permit Condition #: P01399PC2	D. Frequency of monitoring:
B. Description: Condition 8 – Rule 26 Landfill Gas Control Requirements During Maintenance	As needed
	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Records of maintenance activities.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: P01399PC2	D. Frequency of monitoring:
B. Description: Condition No. 9 & 10 – Rule 51 Toxics Testing and HRA Requirements	Every 1000 hours, but not less than 10 years and not more than every 4 years
	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Source testing of the flare for Toxics using APCD approved testing protocol. Refer to the Alliance 2023 Quadrennial Emissions Compliance Test Results.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: 50	D. Frequency of monitoring:
B. Description: Rule 50 Opacity	Ongoing, annually
	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable See Attachment 3
C. Method of monitoring: Routine surveillance and visual inspections of the flare emissions. Annual formal survey of flare emissions.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION
PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 24 (MM/DD/YY) to 12 / 31 / 24 (MM/DD/YY)

A. Attachment # or Permit Condition #: 54.B.1	D. Frequency of monitoring:
B. Description: Rule 54.B.1 Sulfur Compounds APCD memos Rule 54, Sulfur Compounds 12/9/97 and SOx Rule Comparison for Combustion of Gaseous Fuel 12/2/97.	Not applicable E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Compliance with Rule 64 ensures compliance with this rule based on District analysis.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: 54.B.2	D. Frequency of monitoring:
B. Description: Rule 54.B.2 Sulfur Dioxide According to APCD memo from Terri Thomas, 5/23/96, subject Rule 54.B.2 compliance is an emission rate of 0.23 lb/hr would produce a 1 hour maximum concentration of 0.06 ppmv and a 24 hour maximum concentration of 0.03 ppmv, 100 meters from stack	Bi-annually E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Exhaust analysis and compliance demonstration. Source test exhaust value of Sulfur Dioxide of 0.10 lb/hr from June 2024 test.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: 57.1	D. Frequency of monitoring:
B. Description: Rule 57.1 Particulate Matter Emissions from Fuel Burning Equipment	Not applicable. E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Not required based on District analysis dated 12/3/1997.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION
PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 24 (MM/DD/YY) to 12 / 31 / 24 (MM/DD/YY)

A. Attachment # or Permit Condition #: 64.B.1	D. Frequency of monitoring:
B. Description: Rule 64.B.1	Annually
	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Annual fuel gas analysis of hydrogen sulfide by source test using ASTM D4084-94.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: 64.B.2	D. Frequency of monitoring:
B. Description: Rule 64.B.2 Fuel Supplier's Certification	Not applicable.
	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Fuel supplier's certification is supplied by the fuel manufacturer.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: 76.6	D. Frequency of monitoring:
B. Description: Rule 74.6 Surface Cleaning and Degreasing	Annually
	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Maintain records of current solvent information.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION
PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 24 (MM/DD/YY) to 12 / 31 / 24 (MM/DD/YY)

A. Attachment # or Permit Condition #: 74.11.1	D. Frequency of monitoring:
B. Description: Rule 74.11.1 Large Water Heaters and Small Boilers	Not applicable.
	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: There are no large water heaters or small boilers at this location that fall under this rule.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: 74.22	D. Frequency of monitoring:
B. Description: Rule 74.22 Natural Gas-Fired Fan-Type Furnaces.	Not applicable.
	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: There are no natural gas-fired fan-type furnaces at this location that fall under this rule.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: 74.1	D. Frequency of monitoring:
B. Description: Rule 74.1 Abrasive Blasting	As needed
	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Only Rule 74.1 compliant abrasives are used on site. There were no abrasive blasting conducted in 2024.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION
PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 24 (MM/DD/YY) to 12 / 31 / 24 (MM/DD/YY)

A. Attachment # or Permit Condition #: 74.2	D. Frequency of monitoring:
B. Description: Rule 74.2 Architectural Coatings	Annually
	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Maintain VOC records of coatings used. Only coatings that are in compliance with rule 74.2 are used. There were no coatings used in 2024.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: 74.4.D	D. Frequency of monitoring:
B. Description: Rule 74.4.D Cut Back Asphalt	As needed.
	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: No road oils were applied in 2024.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: 74.28	D. Frequency of monitoring:
B. Description: Rule 74.28 Asphalt Roofing Operations	As needed.
	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: No asphalt roofing operations were conducted in 2024.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION
PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 24 (MM/DD/YY) to 12 / 31 / 24 (MM/DD/YY)

A. Attachment # or Permit Condition #: 74.29	D. Frequency of monitoring:
B. Description: Rule 74.29 Soil Decontamination Operations	As needed.
	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: No soil decontamination operations were conducted in 2024.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: 40CFR.61.M	D. Frequency of monitoring:
B. Description: 40 CFR, Part 61, Subpart M – National Emission Standard for Asbestos	As needed
	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: No asbestos demolition or renovation activities were conducted in 2024.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION DEVIATION SUMMARY FORM

Period Covered by Compliance Certification: 01 / 01 / 24 (MM/DD/YY) to 12 / 31 / 24 (MM/DD/YY)

A. Attachment # or Permit Condition #:	B. Equipment description:	C. Deviation Period: Date & Time Begin End: When Discovered: Date & Time
None during reporting period		
D. Parameters monitored:	E. Limit:	F. Actual:
G. Probable Cause of Deviation:	H. Corrective actions taken:	

A. Attachment # or Permit Condition #:	B. Equipment description:	C. Deviation Period: Date & Time Begin: End: When Discovered: Date & Time
D. Parameters monitored:	E. Limit:	F. Actual:
G. Probable Cause of Deviation:	H. Corrective actions taken:	

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION

SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: 01 / 01 / 24 (MM/DD/YY) to 12 / 31 / 24 (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: <7.89 ppm <0.08 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, 2024

A. Emission Unit Description: 40.5 MMBtu/Hr Sur-Lite Model Sacramento Landfill Gas Flare			B. Pollutant: NO_x
C. Measured Emission Rate: 0.70 lb/hr 0.035 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, 2024

A. Emission Unit Description: 40.5 MMBtu/Hr Sur-Lite Model Sacramento Landfill Gas Flare			B. Pollutant: CO
C. Measured Emission Rate: 0.95 lb/hr 0.048 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, 2024

A. Emission Unit Description: 40.5 MMBtu/Hr Sur-Lite Model Sacramento Landfill Gas Flare			B. Pollutant: SO_x
C. Measured Emission Rate: 0.1 lb/hr (as SO_2) 0.004 lb/MMBtu (as SO_2)	D. Limited Emission Rate: 0.41 lb/hr (as SO_2) 0.02 lb/MMBtu (as SO_4)	E. Specific Source Test or Monitoring Record Citation: Modified SCAQMD 307-91	F. Test Date: June 5, 2024

A. Emission Unit Description: 40.5 MMBtu/Hr Sur-Lite Model Sacramento Landfill Gas Flare			B. Pollutant: Destruction Eff.%
C. Measured Emission Rate: NMOC 99.37%, or <7.89 ppm MDE: 99.993%	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, 2024

ATTACHMENT 3

SUPPLEMENTAL INFORMATION HISTORICALLY SUBMITTED WITH TITLE V REPORTS

Oxnard Landfills
2024
Monthly Throughput

Month	*LFG scf*	*HHV*	*CH4 Average*
Jan	32,533,413	288	28.4
Feb	30,633,317	313	31.0
Mar	31,098,485	310	30.6
Apr	31,770,921	323	31.9
May	34,298,548	325	32.1
Jun	34,023,839	322	31.8
Jul	34,927,905	312	30.8
Aug	35,281,292	304	30.0
Sep	33,926,982	300	29.7
Oct	18,033,268	293	29.0
Nov	16,195,964	303	30.0
Dec	16,087,878	314	31.0

Flare Operational Hours
687
671
653
653
695
696
744
743
720
499
426
470
7,657

	Total LFG	**Average HHV**	**MMBtu**
2024	**348,811,812**	**309**	**107,760**

2024 Total Hours
7,657