VENTURA REGIONAL SANITATION DISTRICT
1001 PARTRIDGE DRIVE, SUITE 150 • VENTURA, CA 93003-0704
A Public Waste Management Agency

August 14, 2020

Mr. Keith Macias
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. Macias:

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 January 1, 2020 to June 30, 2020;
2. Semi-Annual Startup, Shutdown and Malfunction (SSM) Plan Report for January 1 to June 30, 2020;
3. 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 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 and annual opacity survey.

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 AAAA).

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) 658-4679 or Edward Pettit at (805) 207-2218.

Sincerely,

Richard Jones
Interim Director of Operations
Ventura Regional Sanitation District

Attachments

1. Semi-Annual EG/Title V Report for January 1 to June 30, 2020
2. Semi-Annual Startup, Shutdown and Malfunction Plan Report for January 1 to June 30, 2020
3. Supplemental Information Historically Submitted with Title V Reports

Copy: United States Environmental Protection Agency, Region IX

ATTACHMENT 1

SEMI-ANNUAL EG/TITLE V REPORT

First Semi-Annual 2020 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

August 2020

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: Richard Jones Interim Director of Operations	Date: 8/14/20

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

01/01/2020 to 06/30/2020

Table of Contents

List of Tables

Appendices

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 January 1 through June 30, 2020:

- 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 three (3) events. Per CFR 60.755(a)(3), corrective action was initiated (through valve adjustments) and re-monitoring was performed, and all three (3) wells were corrected within 15 days. The dates and duration when wells were under positive pressure are detailed in Table 1 below.

Table 1. Summary of Wells with Positive Pressure

Well	Initial Date	Initial Pressure	Re-Monitoring Date s)	Compliant Pressure	Duration
		(in H2O)		(in H2O)	(Days)
EBT-BV8	1/30/20	0.0	1/30/20	-0.01	0
EBT-BV8	3/11/20	7.2	3/11/20	-0.05	0
EBT-BV8	5/13/20	0.06	5/13/20	-0.15	0

- 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 seven (7) events. Per CFR 60.755 (a) (5), corrective action and re-monitoring was taken and five (5) wells were corrected within 15 days. The remaining two (2) wells were corrected between 15 and 120 days. No further action was required.

Table 2. Summary of Wells Above 5% Oxygen

Well	Initial Date	Initial Oxygen (% O2)	Re-Monitoring Date (s)	Compliant Oxygen (% O2)	Duration (Days)
EBT-BV8	1/30/20	15.2	1/30/20 2/12/20	0.0	13
EBE-BV8	3/11/20	7.2	3/11/20	3.0	0
EBT-BV9	4/14/20	6.6	4/14/20 4/28/20	4.1	14
VC-28	4/15/20	20.3	4/15/20 4/28/20	4.9	13
EBE-BV8	5/13/20	18.3	5/13/20 6/24/20	0.0	42
EBT-BV9	5/13/20	9.5	5/13/20 6/24/20	4.9	42
EBS-C6S	6/24/20	18.3	6/24/20	2.9	0

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 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, 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 temperature 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 temperature, 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 January 1 through June 30, 2020 due to, but not limited to, the following reasons:

- Power outage
- 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 3 below.

Table 3. Summary of Flare Downtime Greater than 1 Hour

Control System Periods of Downtime Exceeding 1 Hour		
Date	Duration (Hrs:Min)	Reason for Shutdown
1/1/20	1:11	Flare shutdown due to Southern California Edison (SCE) power outage
1/23/20	22:16	Flare shutdown due to SCE power outage
1/26/20	22:44	Flare shutdown due to SCE power outage
1/27/20	32:30	Flare shutdown due to SCE power outage; remained offline for flare maintenance
3/12/20	96:23	Flare shutdown due to SCE power outage
5/19/20	3:47	Flare shutdown due to SCE power outage
5/22/20	8:15	Flare manually shutdown for scheduled maintenance

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 2019 annual instantaneous surface emissions monitoring event was performed by RES Environmental, Inc. (RES) at the landfills on the dates shown below:

- Bailard Landfill: September 9, 10, and 11, 2019
- Coastal Landfill: December 2 and 18, 2019
- Santa Clara Landfill: November 18 and 19, and December 1, 2019

The 2019 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. The 2020 annual instantaneous surface emissions monitoring event will be performed and reported in the next semi-annual period.

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 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. The 2020 biennial source test was conducted on June 4 and 10, 2020 and the results will be provided in the next semi-annual report as the test report was finalized outside of this reporting period. However, note that during the initial testing on June 4, 2020, the results showed that the flare did not meet the CO emission limits or the methane destruction efficiency. The flare was re-tested on June 10, 2020 and the results met both the CO emission limits and methane destruction efficiency.

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 6/5-6/18	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_2)	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.

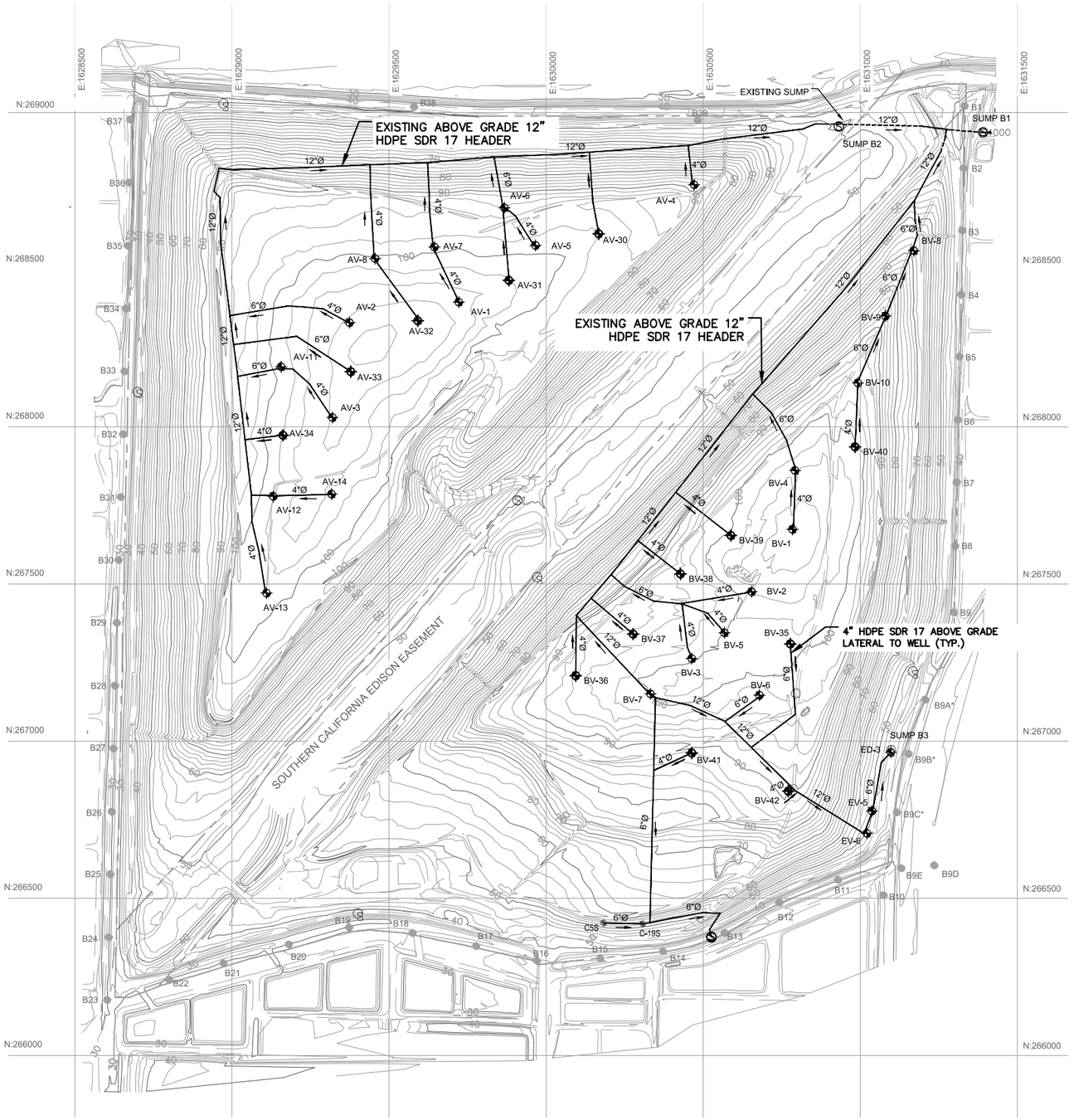
Please note that methane destruction efficiency testing under Condition No. 3 from the Title 17 California Code of Regulations section in the PTO was conducted on June 5-6, 2018. The methane destruction efficiency was 99.99%.

5.0 TITLE V COMPLIANCE

During the reporting period, the Landfill performed all required monitoring and maintained the appropriate records; however there was one (1) deviation. During the biennial source test conducted on June 4, 2020, the flare did not meet the CO permitted emission limits or the methane destruction efficiency requirement. The failed test constitutes deviations of Attachment 74.17.1N3 Condition No. 3c and Attachment CARB CH4 from MSW (05/18/15) Condition No. 4 or Title 17 of the California Code of Regulations Landfill Methane Rule. The flare was re-tested on June 10, 2020 and the testing results indicated that the flare met both the CO emission limits and methane destruction efficiency requirement.

APPENDIX A

LANDFILL SITE PLAN



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GRAPHIC SCALE IN FEET

LEGEND

- BV-6 EXISTING LFG EXTRACTION WELL
- BV-39 NEW LFG HORIZONTAL WELL
- ABOVE GRADE HDPE SDR 17 LFG PIPING
- B12 EXISTING LFG MIGRATION MONITORING PROBE
- PROPERTY BOUNDARY/EASEMENT
- 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.

REV	DATE	DESCRIPTION	DRN BY	DSN BY	CHK BY

CLIENT & OWNER:

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

ENGINEER:

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

BAILARD EXISTING LFG GCCS MAP

LFG GCCS MAP
COASTAL, SANTA CLARA AND BAILARD LANDFILLS

DRAWING NO.
EX-2

PROJECT NO.

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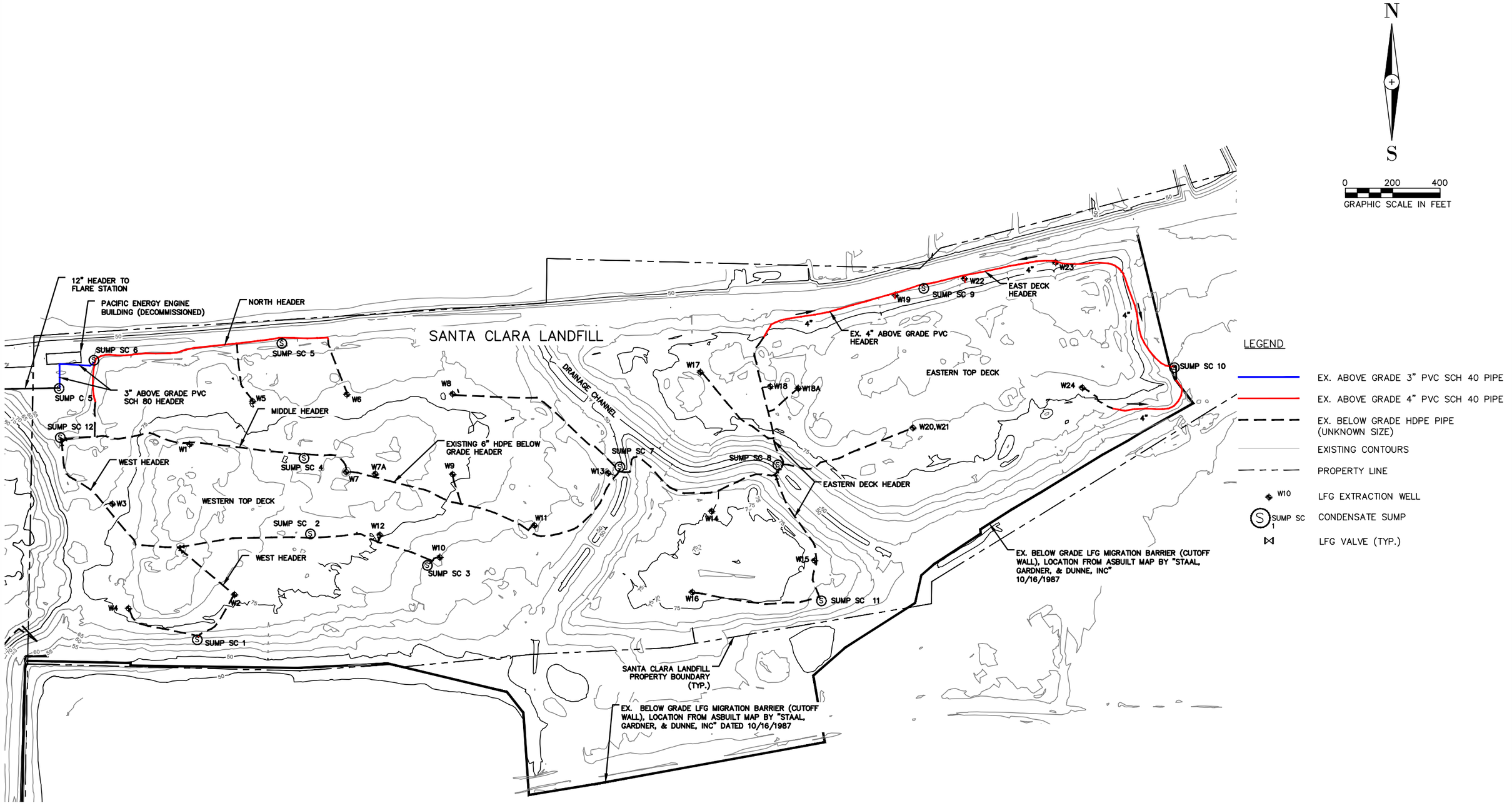


REV	DATE	DESCRIPTION	DRN BY	DSN BY	CHK BY

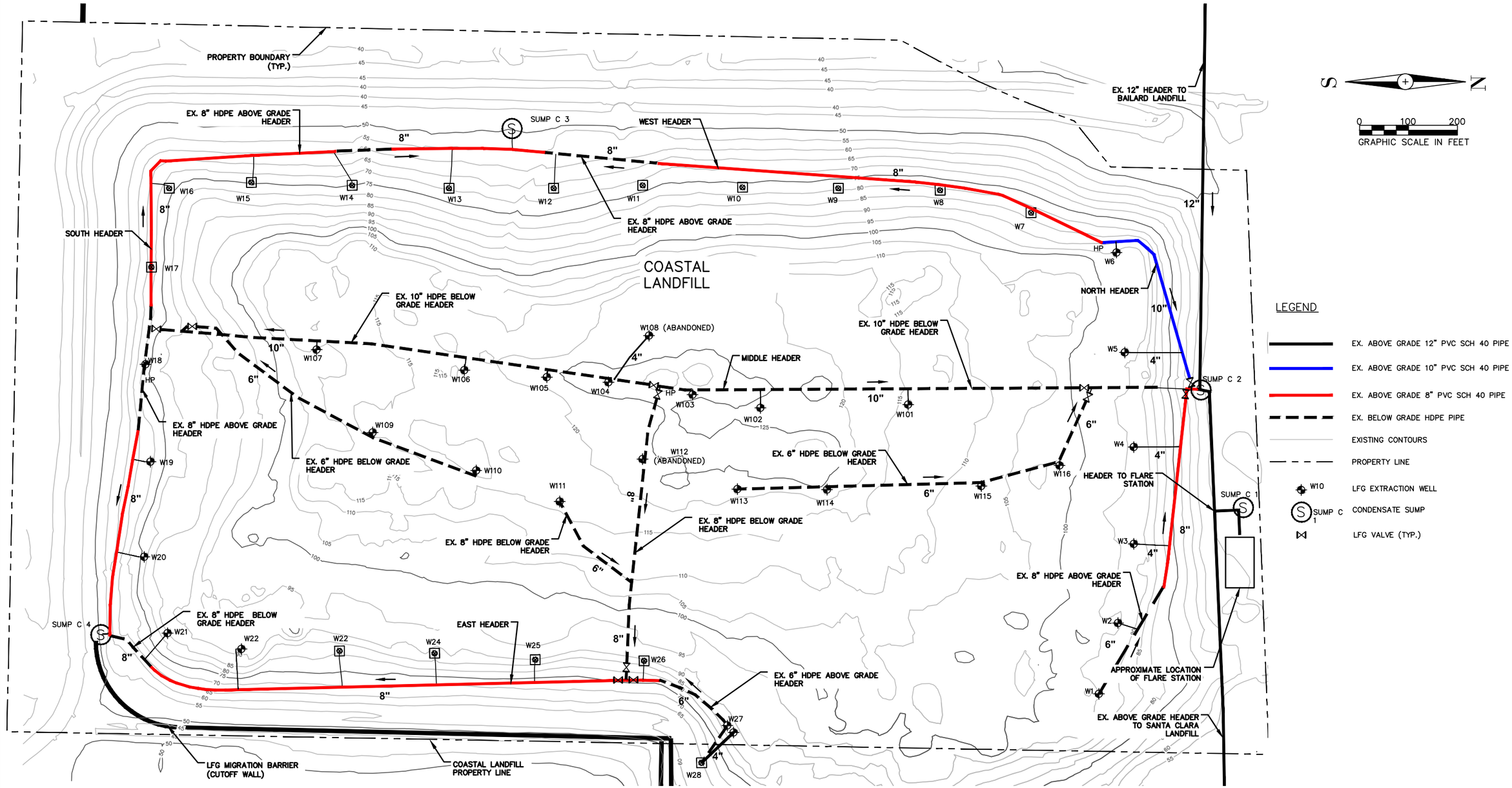
CLIENT & OWNER:
VENTURA REGIONAL SANITATION DISTRICT
3500 TOLAND RD,
SANTA PAULA, CA
PH: 805-658-4675

ENGINEER:
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.
EX-3
PROJECT NO.



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

ENGINEER:
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.
EX-4
PROJECT NO.

APPENDIX B

COVER INTEGRITY MONITORING

INSPECTOR: Alan C. DATE: 01/06/2019

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: 02/13/2020

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: March 09,2020

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: 04-16-2020

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: 05/13/2020

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: 06/18/2020

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: 01-13-2019

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: 02/13/2020

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: 03/18/2020

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: 04-16-2020

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: 05/20/2020

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: 06-18-2020

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: 01/29/2020

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: 02/13/2020

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: March 09, 2020

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: 04-15-2020

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: 05/20/2020

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: 06-18-2020

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

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.

Signature and Title of Responsible Official:	Date: 8/14/20
Signature: _____ 	
Title: Interim Director of Operations	

DESCRIPTION OF SSM EVENTS FOR FLARE

Reporting period January 1 through June 30, 2020

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 *
1/1/20	1/1/20	1:11	Flare	Malfunction	Flare shutdown due to Southern California Edison (SCE) power outage	Y	N/A
1/23/20	1/24/20	22:16	Flare	Malfunction	Flare shutdown due to SCE power outage	Y	N/A
1/26/20	1/27/20	22:44	Flare	Malfunction	Flare shutdown due to SCE power outage	Y	N/A
1/27/20	1/28/20	32:30	Flare	Malfunction	Flare shutdown due to SCE power outage; remained offline for flare maintenance	Y	N/A
2/12/20	2/12/20	0:10	Flare	Shutdown/Startup	Flare manually shutdown for blower maintenance	Y	N/A
3/12/20	3/16/20	96:23	Flare	Malfunction	Flare shutdown due to SCE power outage	Y	N/A
5/19/20	5/19/20	3:47	Flare	Malfunction	Flare shutdown due to SCE power outage	Y	N/A
5/22/20	5/22/20	8:15	Flare	Shutdown/Startup	Flare manually shutdown for scheduled maintenance	Y	N/A
6/30/20	6/30/20	0:09	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

Startup, Shutdown, and Malfunction Plan Deviation Report

Facility: Oxnard Landfills (Bailard, Coastal, Santa Clara) Date Form Completed: 01/02/2020

Unit ID: Coastal Flare, LFG Collection System

Event: ☑ *appropriate box.*

☐ Startup ☐ Shutdown ☑ Malfunction

Date: 01/01/20 Time: Off 1:23 PM On 2:34 PM

Duration: 1 hours 11 minutes

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

The Coastal Flare shutdown at 1:23 PM due to SCE Utility Trip.

Provide description of corrective action:

The flare was restarted and operating at temperature at 2:34 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: 01/24/2020

Unit ID: Coastal Flare, LFG Collection System

Event: ☑ *appropriate box.*

☐ Startup ☐ Shutdown ☑ Malfunction

Date: 01/23/20 Time: Off 4:07 PM On 01-24-20 2:23 PM

Duration: 22 hours 16 minutes

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

The Coastal Flare shutdown at 4:07 PM due to SCE Utility Trip

Provide description of corrective action:

The flare was restarted and operating at temperature at 2:23 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: 01/27/2020

Unit ID: Coastal Flare, LFG Collection System

Event: ☑ *appropriate box.*

☐ Startup ☐ Shutdown ☑ Malfunction

Date: 01/26/20 Time: Off 8:16 AM On 01-27-20 7:00 AM

Duration: 22 hours 44 minutes

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

The Coastal Flare shutdown at 8:16 AM due to SCE Utility Trip.

Provide description of corrective action:

The flare was left off for scheduled Flare Maintenance on 01-27-20 at 7:00 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: 01/29/2020

Unit ID: Coastal Flare, LFG Collection System

Event: ☑ *appropriate box.*

☐ Startup ☑ Shutdown ☐ Malfunction

Date: 01/27/20 Time: Off 7:00 AM On 01-28-20 3:30 PM

Duration: 32 hours 30 minutes

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

The Coastal Flare shutdown on 01-26-20 at 8:16 AM due to SCE Utility Trip and was left off for scheduled Flare Maintenance on 01-27-20 at 07:00.

Provide description of corrective action:

The flare was restarted and operating at temperature on 01-28-20 at 3:30 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: 02/12/2020

Unit ID: Coastal Flare, LFG Collection System

Event: ☑ *appropriate box.*

☐ Startup ☑ Shutdown ☐ Malfunction

Date: 02/12/20 Time: Off 7:17 AM On 7:27 AM

Duration: 0 hours 10 minutes

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

The Coastal Flare was shutdown at 7:17 AM for scheduled Blower Maintenance.

Provide description of corrective action:

The flare was restarted and operating at temperature at 7:27 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: 03/16/2020

Unit ID: Coastal Flare, LFG Collection System

Event: ☑ *appropriate box.*

☐ Startup ☐ Shutdown ☑ Malfunction

Date: 03/12/20 Time: Off 08:00 AM On 03-16-20 8:23 AM

Duration: 96 hours 23 minutes

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

The Coastal Flare shutdown at 8:00 AM due to an SCE Utility Trip resulting in (null) data during this time period.

Provide description of corrective action:

The flare was restarted and operating at temperature on 03/16/20 at 8:23 AM after main circuit breaker was found tripped and reset.

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: 05/19/2020

Unit ID: Coastal Flare, LFG Collection System

Event: ☑ *appropriate box.*

☐ Startup ☐ Shutdown ☑ Malfunction

Date: 05/19/20 Time: Off 3:55 AM On 7:42 AM

Duration: 3 hours 47 minutes

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

The Coastal Flare shutdown at 3:55 AM due to SCE Power Outage.

Provide description of corrective action:

The flare was restarted and operating at temperature at 7:42 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: 05/22/2020

Unit ID: Coastal Flare, LFG Collection System

Event: ☑ *appropriate box.*

☐ Startup ☑ Shutdown ☐ Malfunction

Date: 05/22/20 Time: Off 5:41 AM On 1:56 PM

Duration: 8 hours 15 minutes

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

The Coastal Flare was shutdown remotely at 5:41 AM for scheduled Flare Maintenance (Blue Flame).

Provide description of corrective action:

The flare was restarted and operating at temperature at 1:56 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: 06/30/2020

Unit ID: Coastal Flare, LFG Collection System

Event: ☑ *appropriate box.*

☐ Startup ☑ Shutdown ☐ Malfunction

Date: 06/30/20 Time: Off 6:20 AM On 6:29 AM

Duration: 0 hours 9 minutes

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

The Coastal Flare was shutdown at 6:20 AM for scheduled Blower Maintenance (Blue Flame).

Provide description of corrective action:

The flare was restarted and operating at temperature at 6:29 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 LOG
GAS COLLECTION SYSTEM
OXNARD LANDFILLS

DEVICE	START OF EVENT DATE AND TIME	END OF EVENT DATE AND TIME	TOTAL DOWNTIME (HRS)	CAUSE OR REASON	COMPLETED BY
Well VC-28	4/15/2020	4/28/2020	312:20	Gas Well closed to address O2 Issues; prevent possible subsurface oxidation	Alan C.

ATTACHMENT 3

SUPPLEMENTAL INFORMATION HISTORICALLY SUBMITTED WITH TITLE V REPORTS

Oxnard Landfills
2020
Monthly Throughput

Month	*LFG scf*	*HHV*	*CH4 Average*
Jan	28,722,468	272	26.8
Feb	31,348,442	282	27.9
Mar	28,749,508	279	27.5
Apr	31,579,639	280	27.7
May	31,934,887	268	26.5
Jun	31,245,771	259	25.6

	Total LFG	*Average HHV*	*MMbtu*
2020	**183,580,715**	**265**	**48,710**

Blower Hours	
Blower 1	*Blower 2*
666	0
259	437
0	646
0	720
0	732
30	691
955	**3,226**

VCAPCD Rule 50, Opacity
Annual Compliance Survey

Survey Information:
By: David Thomas
Date: June 4, 2020
Time: 12:30 PM to 1:00 PM
Emissions Unit: Oxnard Landfill Flare

Verification: On the above date I observed no visible emissions (smoke) for a period or periods aggregating more than three (3) minutes during the time observed (0.5 hour).

David F Thomas

DAVID THOMAS – ENGINEERING TECHNICIAN