



August 15, 2022

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 LANDFILLS**

Dear 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 January 1, 2022 to June 30, 2022;
2. Supplemental information historically submitted with Title V Semi-Annual Reports.

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

Attachment 2 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 gas throughputs and the annual opacity form.

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, 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.

Mr. Keith Macias  
Page 2  
August 15, 2022

Sincerely,



Richard Jones  
Director of Operations

Attachments

1. Semi-Annual EG/NESHAP/Title V Report for January 1 to June 30, 2022
2. 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**

First Semi-Annual 2022 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

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 2022

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SEMI-ANNUAL TITLE V REPORT OF REQUIRED MONITORING

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

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: 8/15/22
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Time Period Covered by the Semi-Annual Report of Required Monitoring:

01/01/2022 to 06/30/2022

## Table of Contents

Section	Page
1.0 Introduction.....	1
1.1 Emission Guideline CF Rule.....	1
1.2 Updated NESHAP 40 CFR 63, Subpart AAAA.....	1
2.0 Background Information.....	3
2.1 Owner and Operator Information.....	3
2.2 Description of Landfill Gas Collection and Control System.....	3
3.0 Monitoring and Records Required under NSPS/NESHAP.....	4
3.1 Monitored Parameters.....	5
3.1.1 Wellhead Monitoring Data.....	6
3.1.2 Flare Station Monitoring Data.....	6
3.1.3 Description and Duration of Periods when Gas was Diverted from Control System...7	7
3.1.4 Minimum Flare Temperature.....	7
3.1.5 Control System and Collection System Downtime.....	7
3.2 Surface Emission Monitoring Data.....	10
3.2.1 Annual Monitoring.....	10
3.3 Cover Integrity Monitoring.....	11
3.4 Gas Collection System Installations and Upgrades.....	11
4.0 Performance Test.....	12
5.0 24-Hour High Temperature.....	12
6.0 CMS Summary Report.....	12
7.0 Title V Compliance.....	13

## List of Tables

No.

- 1 Reporting Requirements, Corresponding Regulatory References
- 2 Monitored Parameters, Corresponding Regulatory References
- 3 Summary of Flare Downtime from January 1 through June 30, 2022
- 4 Summary of Source Test Results

## Appendices

- Appendix A Landfill Site Plan  
Appendix B Cover Integrity Monitoring

## 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 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 United States Environmental Protection Agency’s (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.

### 1.2 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, the major compliance provisions of Subpart OOO were replaced as of September 27, 2021 by the NESHAP 40 CFR 63, Subpart AAAA requirements, which essentially implement and enhance provisions of 40 CFR 60, Subparts XXX (which were updated NSPS for Municipal Solid Waste (MSW) landfills promulgated in 2016) as well as removing the Startup, Shutdown, Malfunction (SSM) Plan requirements. 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.

As mentioned above, the major compliance provisions of Subpart OOO were replaced as of September 27, 2021 by the NESHAP 40 CFR 63, Subpart AAAA requirements. As such, OLF is complying with Subpart OOO through compliance with the major provisions of NESHAP AAAA for the sections that apply to the site, which is allowed by the regulations.

For the reporting period from January 1, 2022 through June 30, 2022, 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. 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
40 CFR 63.1961(a), (b), (f)
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).
A temperature or flame presence monitoring device with a 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

Updated NESHAP Subpart AAAA
40 CFR 63.1961(a), (b), (f)
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:

- During the reporting period, all operation of extraction wells had negative pressure, during all monitoring events.
- During the reporting period, all wells were operated with LFG temperatures less than 62.8 degrees C (145 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. There were no exceedances during the reporting period for pressure or temperature; 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.

### 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 2020 biennial source test for the flare was performed on June 4 and 10, 2020, and the source test report was submitted on July 14, 2020 with a temperature at 1,579 degrees F. During the reporting period, the minimum temperature at which the flare should operate was 1,497 degrees F (1,579 degrees F – 82 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.

During the reporting period, the average temperature for the flare did not drop below the minimum temperature 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 January 1 through June 30, 2022 due to, but not limited to, the following reasons:

- Low temperature
- Low flow
- Scheduled or unscheduled flare or collection system maintenance/repair

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. 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 January 1 through June 30, 2022

Control System Periods of Downtime		
Date	Duration	Reason for Shutdown
	(Hrs:Min)	
1/01/22	57:35	Flare shutdown due to low temperature
1/04/22	16:27	Flare shutdown due to low temperature
1/07/22	1:24	Flare shutdown due to low temperature
1/19/22	7:27	Flare shutdown due to low temperature
1/25/22	0:12	Flare shutdown due to low temperature
1/30/22	0:22	Flare shutdown due to low temperature
2/03/22	0:35	Flare shutdown due to low temperature
2/08/22	3:09	Flare shutdown due to low temperature
2/14/22	1:24	Flare shutdown due to low temperature
2/15/22	0:31	Flare shutdown due to low temperature
2/16/22	1:49	Flare shutdown due to low temperature
2/17/22	0:15	Flare shutdown due to low temperature
2/19/22	48:14	Flare shutdown due to low temperature
2/23/22	2:15	Flare shutdown due to low temperature
3/05/22	0:29	Flare shutdown due to low temperature
3/05/22	3:53	Flare shutdown due to low temperature
3/07/22	0:24	Flare shutdown due to low temperature
3/16/22	2:16	Flare shutdown due to low temperature
3/17/22	0:21	Flare shutdown due to low temperature
3/18/22	0:15	Flare shutdown due to low temperature
3/18/22	2:27	Flare shutdown due to low temperature
3/19/22	0:17	Flare shutdown due to low temperature
3/19/22	3:53	Flare shutdown due to low temperature
3/20/22	7:12	Flare shutdown due to low flow
3/23/22	0:24	Flare shutdown due to low flow/low temperature
3/24/22	0:31	Flare shutdown due to low temperature
3/25/22	0:20	Flare shutdown due to low temperature
3/27/22	0:13	Flare shutdown due to low flow/low temperature
3/28/22	0:19	Flare shutdown due to low flow/ low temperature
3/29/22	0:16	Flare shutdown due to low flow/low temperature
3/29/22	0:20	Flare shutdown due to low low/low temperature
3/30/22	4:26	Flare shutdown due to low flow/low temperature
3/30/22	0:53	Flare shutdown due to low flow/ low temperature
3/30/22	6:36	Flare shutdown due to low flow/low temperature
4/01/22	9:35	Flare shutdown due to low flow/ low temperature
4/02/22	0:37	Flare shutdown due to low flow/ low temperature
4/03/22	0:13	Flare shutdown due to low flow/ low temperature
4/04/22	0:23	Flare shutdown due to low temperature
4/04/22	5:17	Flare shutdown due to low temperature

Control System Periods of Downtime		
Date	Duration	Reason for Shutdown
	(Hrs:Min)	
4/04/22	0:12	Flare shutdown due to low temperature
4/04/22	0:29	Flare shutdown due to low temperature
4/04/22	0:26	Flare shutdown due to low temperature
4/04/22	0:49	Flare shutdown due to low temperature
4/09/22	0:21	Flare shutdown due to low temperature
4/09/22	0:13	Flare shutdown due to low temperature
4/11/22	2:49	Flare shutdown due to low temperature
4/13/22	2:22	Flare shutdown due to low temperature
4/13/22	0:50	Flare shutdown due to low temperature
4/14/22	0:08	Flare shutdown due to low temperature
4/18/22	0:33	Flare shutdown due to low flow
4/21/22	0:20	Flare shutdown due to low flow/low temperature
5/09/22	14:24	Flare shutdown due to blower vibration
5/15/22	0:43	Flare shutdown due to blower vibration
5/20/22	0:53	Flare shutdown due to low flow
5/22/22	0:23	Flare shutdown due to low flow/ low temperature
5/23/22	0:15	Flare shutdown due to low temperature
5/26/22	0:21	Flare shutdown due to low temperature
5/29/22	3:48	Flare shutdown due to low temperature
6/02/22	3:32	Flare shutdown due to low temperature
6/07/22	0:20	Flare shutdown due to low temperature
6/08/22	0:14	Flare shutdown due to low temperature
6/08/22	0:14	Flare shutdown due to low temperature
6/09/22	2:33	Flare shutdown due to low temperature
6/10/22	7:50	Flare shutdown due to low temperature
6/10/22	0:26	Flare shutdown due to low temperature
6/10/22	6:45	Flare shutdown due to low temperature
6/11/22	3:54	Flare shutdown due to low temperature
6/11/22	2:49	Flare shutdown due to low temperature
6/12/22	1:31	Flare shutdown due to low temperature
6/12/22	2:00	Flare shutdown due to low temperature
6/13/22	3:34	Flare shutdown due to low temperature
6/13/22	0:47	Flare shutdown due to low temperature
6/17/22	1:24	Flare shutdown due to low temperature
6/17/22	0:45	Flare shutdown due to low temperature
6/17/22	8:12	Flare shutdown due to low temperature
6/18/22	0:35	Flare shutdown due to low temperature
6/18/22	1:28	Flare shutdown due to low temperature
6/19/22	9:49	Flare shutdown due to low temperature
6/19/22	5:05	Flare shutdown due to low temperature
6/20/22	1:26	Flare shutdown due to low temperature

Control System Periods of Downtime		
Date	Duration	Reason for Shutdown
	(Hrs:Min)	
6/21/22	0:22	Flare shutdown due to low temperature
6/21/22	0:19	Flare shutdown due to low temperature
6/21/22	0:33	Flare shutdown due to low temperature
6/21/22	2:09	Flare shutdown due to low temperature
6/23/22	0:16	Flare shutdown due to low temperature
6/23/22	0:13	Flare shutdown due to low temperature
6/23/22	0:21	Flare shutdown due to low temperature
6/23/22	0:20	Flare shutdown due to low temperature
6/24/22	2:31	Flare shutdown due to low temperature
6/25/22	0:21	Flare shutdown due to low temperature
6/25/22	0:24	Flare shutdown due to low temperature
6/26/22	24:48	Flare shutdown due to low temperature
6/27/22	1:02	Flare shutdown due to low temperature
6/28/22	0:24	Flare shutdown due to low temperature
6/28/22	0:41	Flare shutdown due to low temperature
6/28/22	0:29	Flare shutdown due to low temperature
6/28/22	0:17	Flare shutdown due to low temperature
6/29/22	0:38	Flare shutdown due to low temperature
6/29/22	0:26	Flare shutdown due to low temperature
6/29/22	1:08	Flare shutdown due to low temperature
6/30/22	2:44	Flare shutdown due to low temperature
6/30/22	1:11	Flare shutdown due to low temperature
6/30/22	2:18	Flare shutdown due to low temperature

## 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 2021 annual instantaneous surface emissions monitoring event was performed by RES Environmental, Inc. (RES) at the landfills on the dates shown below:



- Bailard Landfill: September 20 and 21, 2021
- Coastal Landfill: December 1, 2021
- Santa Clara Landfill: November 23, 2021

The 2021 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. The 2022 annual instantaneous surface emissions monitoring event will be performed and reported in the next semi-annual period.

### 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 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 4 and 10, 2020 and reported on July 14, 2020. 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 5 below. The next testing event was conducted on June 1 and 2, 2022 and will be reported in the next semi-annual report.

Table 4. Summary of Source Test Results

Test Date	Parameter	Flare Result	Emission Limit
Flare 6/4/20 and 6/10/20	NOx Emission Rate (lb/MMBtu)	0.0191	0.06 lb/MMBtu
	CO Emission Rate (lb/MMBtu)	0.0643	0.20 lb/MMBtu
	SOx Emission Rate (lb/MMBtu)	0.0032	0.02 lb/MMBtu
	NMOC Emission Rate (ppmv, as hexane @ 3% O <sub>2</sub> )	0.812	20 ppmv
	NMOC Destruction Efficiency (%)	95.8	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 1, 2021. The methane destruction efficiency was 99.95%.

## 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.

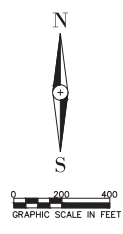
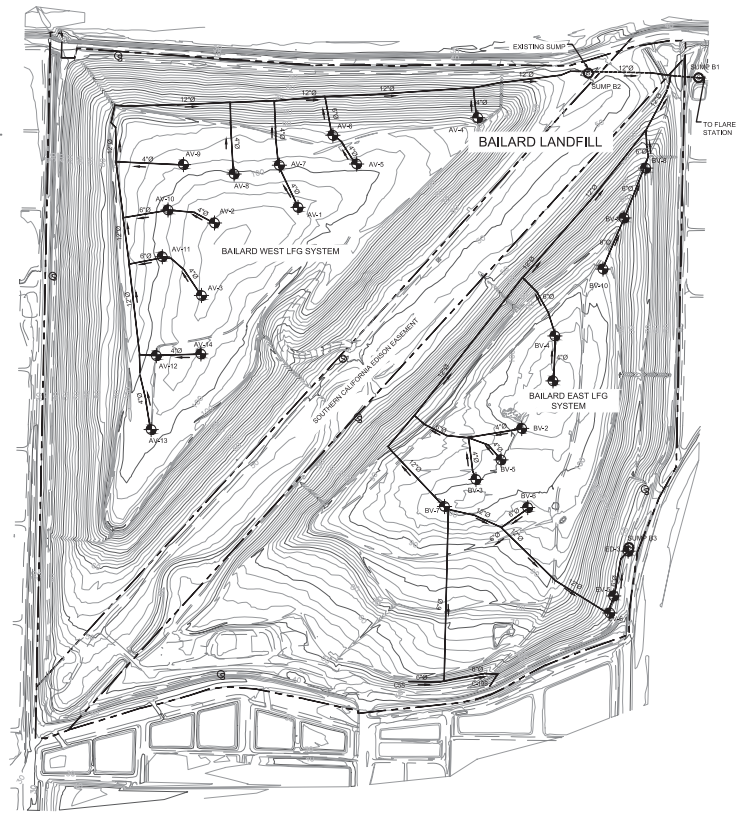
## 6.0 CMS SUMMARY REPORT

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



- LEGEND**
- BV-# LFG EXTRACTION WELL
  - ABOVE GRADE HDPE SDR 17 LFG PIPING
  - - - PROPERTY BOUNDARY/EASEMENT
  - ⊙ BELOW GRADE SUMPS
  - ⊘ 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



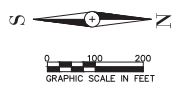
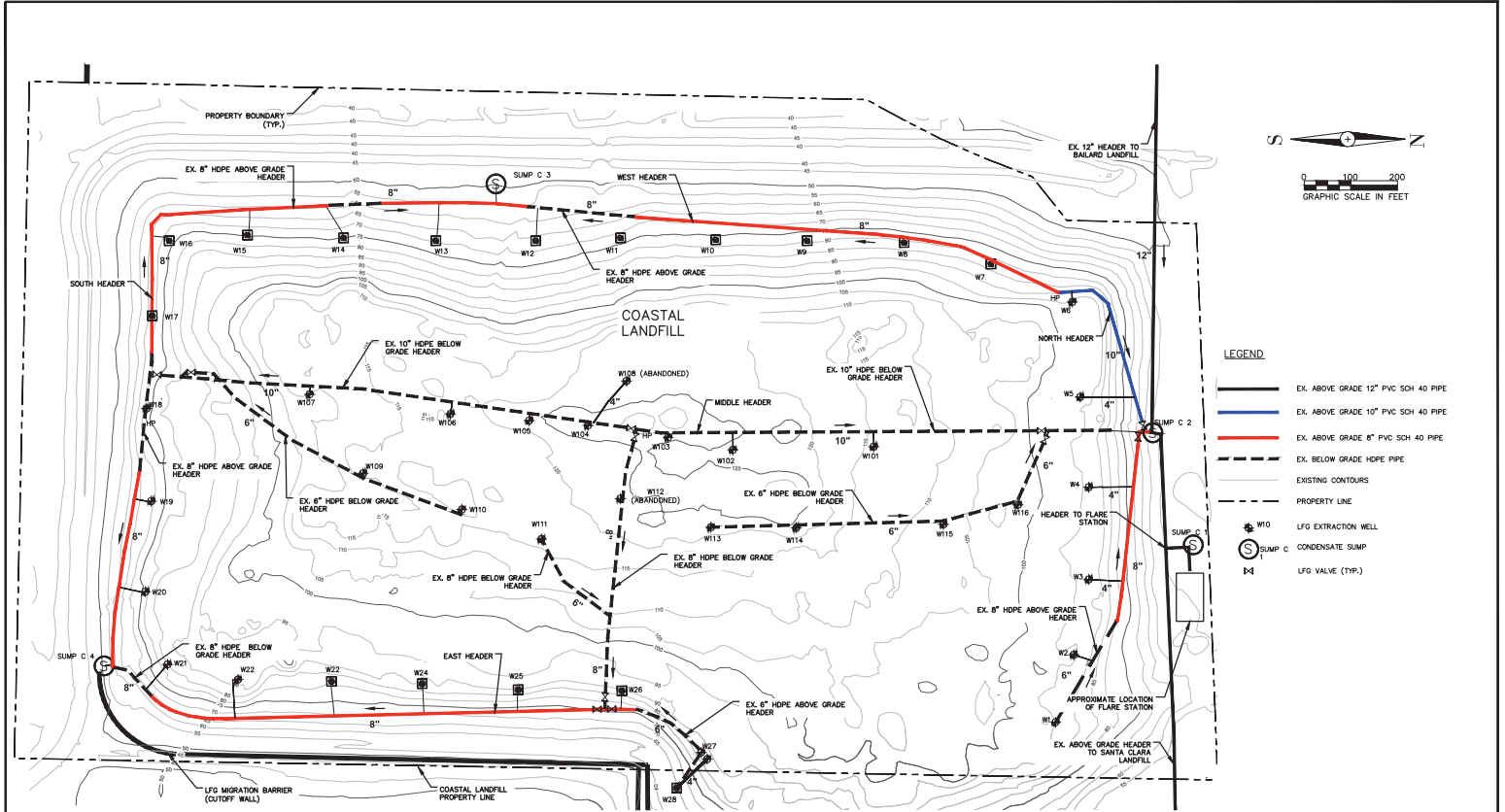
3500 TOLAND RD.  
 SANTA PAULA, CA  
 TEL: 805-658-4075

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

BAILARD LANDFILL GCCS MAP  
 LFG GCCS MAP  
 COASTAL, SANTA CLARA AND  
 BAILARD LANDFILLS

DRAWING NO.  
**FIG.3**  
 PROJECT NO.

\\Mac\Projects\Jobs\Bailard\FIGURES\FIGURE 3.dwg 4/25/17 mpstamarcos



- LEGEND**
- EX. ABOVE GRADE 12" PVC SCH 40 PIPE
  - EX. ABOVE GRADE 10" PVC SCH 40 PIPE
  - EX. ABOVE GRADE 8" PVC SCH 40 PIPE
  - - - EX. BELOW GRADE HOPE PIPE
  - EXISTING CONTOURS
  - - - PROPERTY LINE
  - W10 LFG EXTRACTION WELL
  - SUMP C. 1 CONDENSATE SUMP
  - LFG VALVE (TYP.)

ISSUED FOR PERMIT

REV	DATE	DESCRIPTION	DRN BY	DSN BY	CHK BY	CLIENT & OWNER:

CLIENT & OWNER:



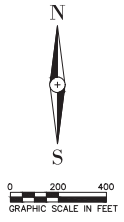
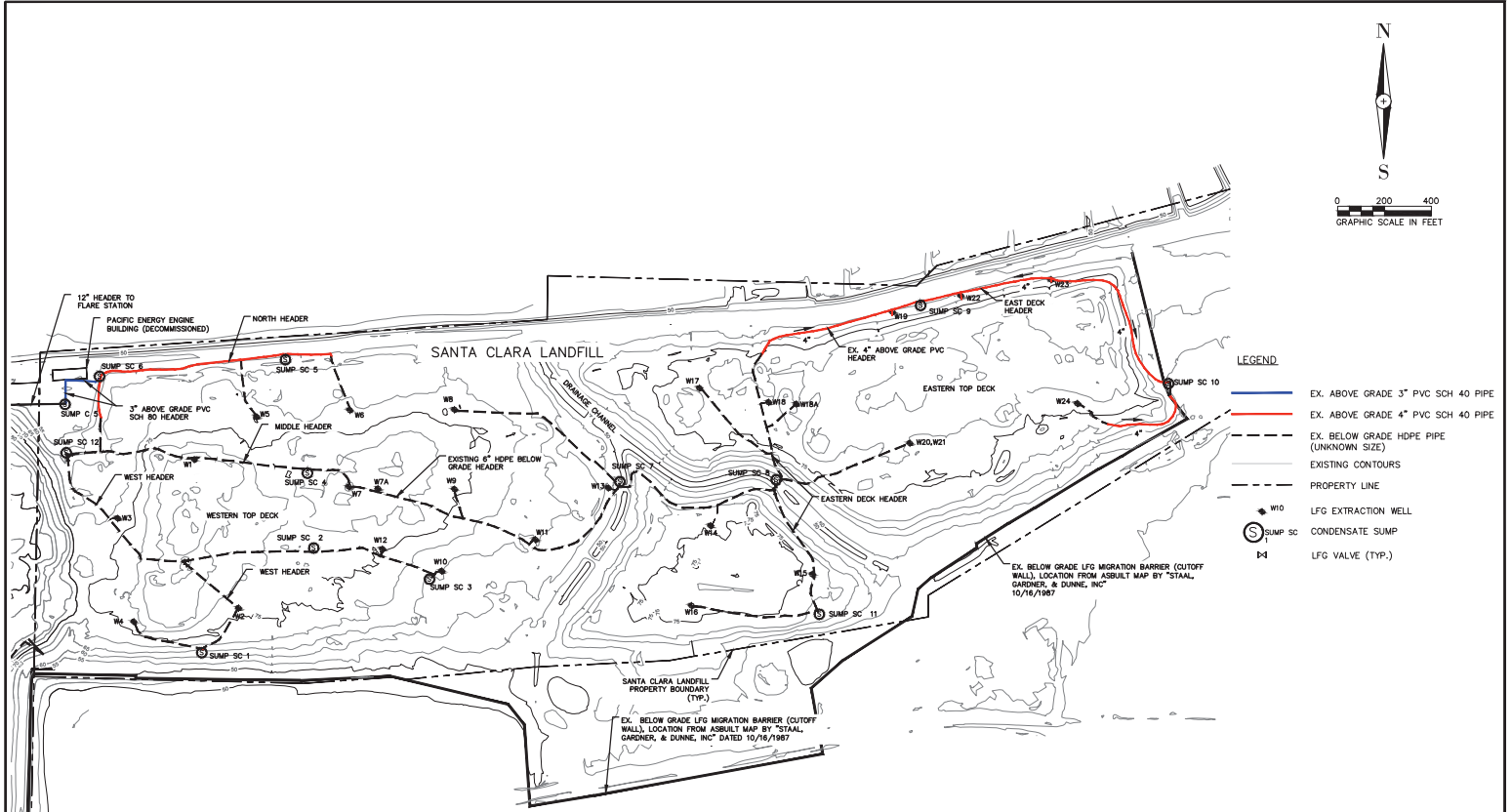
3500 TOLAND RD,  
SANTA PAULLA, CA  
PH: 805-658-4675

**BIOGAS ENGINEERING**

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

COASTAL LANDFILL GCCS MAP  
LFG GCCS MAP  
COASTAL, SANTA CLARA AND  
BAILLARD LANDFILLS

DRAWING NO.  
**FIG.4**  
PROJECT NO.



- LEGEND**
- EX. ABOVE GRADE 3" PVC SCH 40 PIPE
  - EX. ABOVE GRADE 4" PVC SCH 40 PIPE
  - - - EX. BELOW GRADE HDPE PIPE (UNKNOWN SIZE)
  - EXISTING CONTOURS
  - - - PROPERTY LINE
  - W10 LFG EXTRACTION WELL
  - SC SUMP SC CONDENSATE SUMP
  - IV LFG VALVE (TYP.)

ISSUED FOR PERMIT

REV	DATE	DESCRIPTION	DRN BY	DSN BY	CHK BY	CLIENT & OWNER:

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

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

SANTA CLARA LANDFILL GCCS MAP  
LFG GCCS MAP  
COASTAL, SANTA CLARA AND  
BAILLARD LANDFILLS

DRAWING NO.  
**FIG.5**  
PROJECT NO.

APPENDIX B  
COVER INTEGRITY MONITORING











































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 became 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 January 1 – June 30, 2022.

- 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 (1/1/2022 – 6/30/2022) the GCCS operated a total of 4,009 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.<sup>1</sup>

- There were no instances during the reporting period during which the average operational combustion temperature of the flare was measured to be less than 1,497 deg F 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.<sup>1</sup>

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**

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

**Oxnard Landfills  
2022  
Monthly Throughput**

<i>Month</i>	<i>LFG scf</i>	<i>HHV</i>	<i>CH4 Average</i>
<b>Jan</b>	32,574,738	270	26.7
<b>Feb</b>	31,883,317	281	27.8
<b>Mar</b>	34,996,759	239	23.6
<b>Apr</b>	18,525,110	224	22.1
<b>May</b>	34,203,166	237	23.4
<b>Jun</b>	28,315,535	237	23.4

<i>Blower Hours</i>	
<i>Blower 1</i>	<i>Blower 2</i>
661	0
615	0
707	0
278	417
0	723
0	608
<b>2,261</b>	<b>1,748</b>

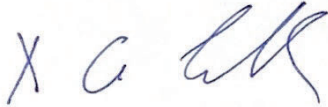
	<i>Total LFG</i>	<i>Average HHV</i>	<i>MMbtu</i>
<b>2022</b>	<b>180,498,625</b>	<b>248</b>	<b>44,753</b>

**VCAPCD Rule 50, Opacity  
Annual Compliance Survey**

Survey Information:

By: Alan Charlesworth  
Date: February 15, 2022  
Time: 07:30 AM to 08:00 AM  
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).

A handwritten signature in blue ink, appearing to read 'X C Charlesworth'.

Alan Charlesworth – ENGINEERING TECHNICIAN