

December 20, 2023  
File No. 01202092.00, Task 8

Mr. Jeffrey Gove  
Director of Compliance and Enforcement  
Bay Area Air Quality Management District  
375 Beale Street, Suite 600  
San Francisco, California 94105

TV Tracking #: 886

1.  RECEIVED IN 12/20/2023  
ENFORCEMENT: \_\_\_\_\_

**Subject: SEMI-ANNUAL BAAQMD RULE 8-34/NSPS/NESHAP AND TITLE V REPORTS  
SHORELINE AMPHITHEATRE, MOUNTAIN VIEW, CA (FACILITY NO. A2561)**

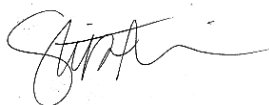
Dear Mr. Gove:

On behalf of the Shoreline Amphitheatre, SCS Engineers (SCS) is submitting the Bay Area Air Quality Management District (BAAQMD) Rule 8-34/New Source Performance Standards (NSPS) Semi-Annual and Title V Semi-Annual Reports for the Shoreline Amphitheatre (Shoreline), Mountain View, California.

The enclosed documents satisfy the reporting requirements of Title 40 of the Code of Federal Regulations (CFR), Part 63, Subpart AAAA (National Emissions Standards for Hazardous Air Pollutants [NESHAPs] for Landfills) and 40 CFR Part 60, Subpart WWW (New Source Performance Standards [NSPS]), including sections 40 CFR 60.757(f) and 40 CFR 62.16724(f), which describe the items to be submitted in semi-annual reports for landfills seeking to comply with NSPS using an active collection system. The reports also satisfy BAAQMD requirements under Rule 8-34 and the facility's Title V permit. The semi-annual reports cover the period of June 1, 2023 through November 30, 2023.

Please contact Melissa St. John at (916) 406-5476 or mstjohn@scsengineers.com if you have any questions or require any additional information.

Sincerely,



Stipe Markotic  
Associate Professional  
**SCS ENGINEERS**



Melissa St John  
Project Manager  
**SCS ENGINEERS**

cc: Jessica Hill, Shoreline Amphitheatre  
Administrator, Air Division U.S. EPA Region IX  
Pat Sullivan, SCS Engineers  
Art Jones, SCS Field Services

Enclosures: NSPS/NESHAP/BAAQMD Rule 8-34 Semi-Annual Report  
Semi-Annual Title V Report of Required Monitoring (with Certification)



# NSPS/NESHAP/BAAQMD Rule 8-34 Semi-Annual Report

June 1, 2023 through November 30, 2023

Shoreline Amphitheatre

Mountain View, California (Facility No. A2561)

Prepared for:

Shoreline Amphitheatre  
1 Amphitheatre Parkway  
Mountain View, CA 94043

For Submittal to:

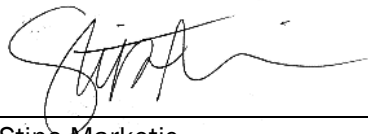
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**SCS ENGINEERS**

01202092.00, Task 8 | December 2023

3900 Kilroy Airport Way, Suite 100  
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This New Source Performance Standards (NSPS)/National Emission Standard for Hazardous Air Pollutants (NESHAP)/Bay Area Air Quality Management District (BAAQMD) Rule 8-34 Semi-Annual Report for the Shoreline Amphitheatre in Mountain View, California, dated December 2023, was prepared and reviewed by the following:



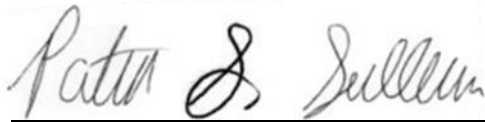
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Associate Professional  
**SCS ENGINEERS**



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Melissa St. John  
Project Manager  
**SCS ENGINEERS**



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Patrick S. Sullivan, REPA, CPP, BCES  
Senior Vice President  
**SCS ENGINEERS**

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## 1.0 INTRODUCTION

On behalf of Live Nation and the Shoreline Amphitheatre (Shoreline or Landfill), SCS Engineers (SCS) submits this New Source Performance Standards (NSPS), National Emission Standards for Hazardous Air Pollutants (NESHAP), and Bay Area Air Quality Management District (BAAQMD) Rule 8-34 Semi-Annual Report to the BAAQMD. This Semi-Annual Report pertains to the landfill gas (LFG) collection and control system (GCCS) operated at Shoreline and covers the period of June 1, 2023 through November 30, 2023.

Please note that as of June 21, 2021, the facility became subject to and has complied with the new Emission Guidelines (EG) requirements in California. The approved state plan for the EG includes compliance with Title 17 California Code of Regulations (CCR) Sections 95460 to 95476, known as AB 32 Landfill Methane Rule (LMR) and specific portions of 40 CFR Part 62 Subpart 000. This Semi-Annual report also meets the requirements of the revised federal National Emissions Standards for Hazardous Air Pollutants (NESHAP) 40 CFR Part 63, Subpart AAAA rule for MSW landfills, 40 CFR 63, Subpart AAAA, including provisions which went into effect on September 27, 2021. Finally, this report complies with the requirements specified in Shoreline's Title V permit and BAAQMD Rule 8-34, which contains some NSPS Subpart WWW requirements. As of September 27, 2021, Shoreline has chosen to comply with the revised NESHAP rule for the equivalent compliance provisions of the Subpart 000 provisions in the California EG Rule. Shoreline will continue to report on outdated NSPS/NESHAP requirements as long as they remain in the Title V permit.

This report includes the following information, as required by BAAQMD Rule 8-34-411 and 40 CFR 63, Subpart AAAA:

- Continuous temperature monitoring and dates of any excesses (8-34-501.3, 507 and 63.1958(e)(f))
- Testing performed to satisfy of the requirements of this Rule (8-34-501.4)
- Monthly LFG flow rates and excesses (8-34-501.5 and 63.1958(e)(f))
- Collection and emission control system leak testing and any excesses, action taken to correct excesses, and re-monitored concentrations (8-34-501.6, 503 and 63.1958(d)(2))
- Landfill surface monitoring, location of excesses, excess concentration, date discovered, actions taken to repair the excess, and re-monitored concentrations (8-34-501.6, 506 and 63.1961(f))
- Annual refuse acceptance rates, amount of refuse in place, and the nature, location, and amount of non-degradable waste (8-34-501.7 and 501.8).
- Well head monitoring including gauge pressure, LFG temperature, and LFG oxygen concentration (8-34-501.9, 505 and 63.1961(a))
- Continuous flow monitoring (8-34-501.10 and 63.1958(e)(f))
- Key emission control system operating parameters (8-34-509)
- Date and time for each startup and shutdown event for the GCCS (8-34-501)

## **2.0 SITE BACKGROUND INFORMATION**

Shoreline Amphitheatre is sited on a small portion of a much larger landfill site owned and operated by the City of Mountain View. The portion that includes Shoreline is referred to as the Vista site and was operated as a municipal landfill from 1980 to 1993. Bill Graham Presents, Inc. (BGP) began leasing the land on the northeast edge of the Vista site from the City of Mountain View in 1986 and developed it as the Shoreline Amphitheatre entertainment complex. The portion of the landfill operated as Shoreline Amphitheatre has not accepted waste since BGP began leasing the property. BGP installed a GCCS shortly after developing the site as an amphitheatre and Live Nation has maintained it separately from the larger City of Mountain View Landfill.

A Compliance and Enforcement Agreement, dated September 29, 2019, between Live Nation Worldwide, Inc. (Live Nation) as the owner/operator of Shoreline, the BAAQMD, and the City of Mountain View required the GCCS to be reconfigured to transport LFG from the Shoreline Amphitheatre collection system directly to the City of Mountain View's flare station instead of directing the LFG to the CAS. As required by the September 2019 Compliance and Enforcement Agreement, SCS submitted a proposed plan for implementing the project on November 27, 2019. BAAQMD provided notification of District approval of the Plan via email from Brenda Cabral on March 24, 2020. On May 5, 2020, SCS submitted an application on behalf of Live Nation to the BAAQMD to obtain the necessary permits to reconfigure the GCCS to convey LFG the City of Mountain View's flare station. The Authority to Construct (ATC) permit was issued by the BAAQMD on February 1, 2021. The City of Mountain View required Live Nation to obtain a building permit prior to commencing construction. The building permit was received on June 17, 2021. GCCS construction activities began August 2021 and concluded in November 2021. As of November 30, 2021, all LFG collected from Shoreline is now routed to the City of Mountain View's flare station and the A-2 flare and CAS are no longer in operation.

### **2.1 EXISTING LANDFILL GAS CONTROL SYSTEM**

The GCCS at Shoreline currently consists of 9 vertical extraction wells, which route all LFG to the City of Mountain View's flare station for destruction. A site plan of the existing GCCS is provided in **Appendix A**. Maintenance and monitoring of the GCCS is contracted to SCS Field Services (SCSFS).

## **3.0 MONITORING AND RECORDS**

### **3.1 CONTINUOUSLY MONITORED PARAMETERS**

Under BAAQMD Rule 8-34-301.1, the GCCS must be operated continuously. As of November 30, 2021, LFG from Shoreline is routed to the City of Mountain View's flare station and the A-2 flare and CAS are no longer in operation. Therefore, there are no longer any parameters that are continuously monitored. However, extraction wells are maintained under negative pressure (i.e., vacuum) continuously as required.

### **3.1.1 Gas Extraction System Downtime**

As of November 30, 2021, LFG is routed to the City of Mountain View's flare station. As both the CAS system and the A-2 Flare at Shoreline Amphitheatre are no longer in operation and the active wells route all LFG to the City of Mountain View's flare station, downtime of the GCCS will be reported by the City of Mountain View.

### **3.1.2 Emission Control System Downtime**

On November 30, 2021, the CAS system was permanently shutdown per the Compliance and Enforcement Agreement, dated September 2019, and the ATC that was issued by the BAAQMD on February 1, 2021 to reconfigure the GCCS to the City of Mountain View's flare station.

During this reporting period, there were no instances when LFG flow passed through the flare or CAS uncontrolled (i.e., free venting), and the collected LFG stream was never diverted from the control devices. In compliance with the NESHAP rule, the work practice standard were met during each collection system downtime event, and emissions were minimized as required. The City of Mountain View will report on startup, shutdown, and malfunction (SSM) events for the control devices.

### **3.1.3 Individual Well Downtime**

Beginning August 2021 and through November 2021, all of the wells at the Landfill that were connected to the GCCS were either reconfigured to convey LFG offsite or permanently decommissioned per the ATC issued by BAAQMD on February 1, 2021. There was no downtime for individual wells during this reporting period.

### **3.1.4 Minimum Flare Temperature**

Flare A-2 has been decommissioned. Therefore, there were no data recorded for this device during the reporting period. Compliance information for the control devices will be submitted by the City of Mountain View.

## **3.2 COMPONENT LEAK QUARTERLY MONITORING**

### **3.2.1 Third Quarter 2023 Monitoring**

The third quarter 2023 component leak monitoring, required by BAAQMD Rule 8-34-503, was conducted on September 6, 2023. Testing was performed by SCSFS using an organic vapor analyzer (OVA), which was calibrated on the day the testing occurred. Results of the monitoring event are provided in **Appendix B**.

No concentrations of methane gas over 500 parts per million by volume (ppmv) were detected during the third quarter 2023 monitoring event. The highest reading detected during the third quarter 2023 leak testing was 5 ppmv.

### **3.2.2 Fourth Quarter 2023 Monitoring**

The fourth quarter 2023 component leak monitoring, required by BAAQMD Rule 8-34-503, was conducted on October 12, 2023. Testing was performed by SCSFS using an organic vapor analyzer



(OVA), which was calibrated on the day the testing occurred. Results of the monitoring event are provided in **Appendix B**.

No concentrations of methane gas over 500 ppmv were detected during the fourth quarter 2023 monitoring event. The highest reading detected during the fourth quarter 2023 leak testing was 4 ppmv.

### **3.3 CONTROL EFFICIENCY**

As of November 30, 2021, LFG collected from Shoreline is routed to the City of Mountain View's flare station and the A-2 flare and CAS are no longer in operation. Therefore, source testing is no longer performed on either the A-2 flare or the CAS.

### **3.4 LANDFILL SURFACE MONITORING**

Surface emissions monitoring (SEM) at Shoreline is conducted in accordance with BAAQMD 8-34, NSPS, and NESHAP rules and as required by the City of Mountain View Fire Department for health and safety purposes. Shoreline uses an alternative to the standard back and forth sweep monitoring pattern typically used for landfill SEM. A reading is taken over 134 pre-determined points and along 17 continuous paths including sweeps across the wellfield surface, all buildings on the landfill property, and all areas accessible to concert patrons. The surface is monitored before every entertainment event that takes place at Shoreline, resulting in almost weekly monitoring during the spring, summer, and fall months. Winter monitoring is less frequent; however, rarely is there a time period greater than one month between surface monitoring events. As Shoreline is a closed landfill, the facility is eligible to conduct SEM annually rather than quarterly, per 8-34-506 as well as under the state and Federal rules. The latest annual SEM was conducted during the first quarter 2023 and was provided in Appendix C of the Semi Annual NSPS/NESHAP report dated June 2023. The next Annual SEM event is scheduled for first quarter 2024.

#### **3.4.1 Annual 2023 Monitoring**

Annual surface emissions testing for any leaks with a methane concentration of greater than 500 ppmv, as required by BAAQMD Rule 8-34-506, was conducted on January 18, 2023. SCSFS performed the annual testing using an OVA, which was calibrated on the testing date.

No methane gas concentrations in excess of 500 ppmv were detected during the annual 2023 monitoring event. A figure of the monitored locations and the concentrations of methane detected were provided in Appendix C of the First 2023 NSPS-NESHAP/Rule 8-34 Semi-Annual Report. The highest reading detected during the 2023 annual SEM was 3 ppmv. The next required annual SEM event is due by the end of 2024.

### **3.5 GAS COLLECTION SYSTEM INSTALLATIONS AND UPGRADES**

From August 2021 through November 2021, the GCCS at Shoreline was reconfigured to route all LFG to the City of Mountain View - Shoreline Landfill's (Plant #2740) flare station. Nine wells remain connected to the GCCS and convey the LFG offsite allowing for permanent decommissioning of the A-2 flare and CAS during construction.

## 3.6 WELL FIELD MONTHLY MONITORING

During the reporting period, the extraction wells were monitored for pressure, oxygen, and temperature as required by BAAQMD 8-34, NSPS, and NESHAP rules. Condition 876, Part 3 of the Landfill's permit allows for wells to be temporarily disconnected if the methane concentration at the wellhead is less than 20% by volume. In operational wells, the oxygen concentration is not permitted to exceed 15% by volume, unless the well contains less than 20% methane by volume, if the well is being operated in order to minimize exposure to LFG during an entertainment event (Condition 876, Part 3(i)).

Per the ATC, forty-seven (47) wells that were previously connected to the GCCS were decommissioned from August 1, 2021 through November 20, 2021. The wells at Shoreline are a sub-grade design with limited access, which only allows for operation of the valve. This is a necessity at Shoreline since the wellfield area is also used as a recreational amphitheatre. As such, it is sometimes difficult to get accurate readings of the gas quality at the wellhead since the valve where the sample port is connected is not at the actual wellhead. In addition, because of the use of the closed landfill as an outdoor amphitheatre, there is no margin of error for LFG surface emissions or migration; therefore, the extraction wells are generally kept online throughout the year although they do pull low quality gas with high oxygen. The nine active gas extraction wells were monitored on a monthly basis during this reporting period. Monitoring results are provided in **Appendix C**.

### 3.6.1 Pressure

All nine of the operational extraction wells are not required to be operated under a vacuum pursuant to Title 17 of the California Code of Regulations (CCR) Section §95464(c)(1) and NESHAP 63.1958(b) since they are installed beneath a final cover system that includes a geomembrane. The City of Mountain View, however, requires that all well be maintained under vacuum.

All nine of the operational extraction wells were operating under negative pressure during the monitoring events conducted during the reporting period, in accordance with BAAQMD Rule 8-34-305 and 8-34-414. No further monitoring was required.

### 3.6.2 Oxygen

Efforts were made to operate all extraction wells with an oxygen content of less than 15% in accordance with the Landfill's permit. Because Shoreline cannot afford to allow surface leaks while recreational events are occurring on the premises, the LFG extraction system vacuum is often operated at a higher than optimal extraction rate; as such, oxygen concentrations in the collected LFG can be higher than in typical scenarios. Note under the EG rule, Subpart 000, and the NESHAP rule, oxygen concentration greater than 5% is no longer an exceedance, but under BAAQMD Rule 8-34-414 it still is. Wellfield monitoring and tuning will continue in an effort to adhere to these requirements as stipulated in the permit.

During the reporting period, there was (1) exceedance of the oxygen limit based on the alternative wellhead limits required under Rule 8-34-305 and 8-34-414. The exceedance concentrations along with the corrective actions are provided in **Table 1**.

### 3.6.3 Temperature

As discussed above, the wells at Shoreline are a sub-grade design with limited access, which only allows for operation of the valve. Therefore, temperature monitoring of the individual wellheads is not always accurate, and any readings would not be representative of actual LFG temperatures at the actual wellhead. However, readings were taken in order to comply with BAAQMD Rule 8-34 as well as NESHAP 63.1958(c), and these temperature readings all show ambient temperatures below 131 degrees Fahrenheit (°F) (55 degrees Celsius [°C]).

No enhanced monitoring or additional corrective action under the NESHAP's rule was triggered during the reporting period.

### 3.6.4 Monthly Methane and Flow Readings (Test Port)

Monthly readings were taken at the test port located at the point where the collection system ties into the City of Mountain View's GCCS. The monthly flow data along with the methane concentration is provided in **Table 2**.

## 3.7 COVER INTEGRITY MONITORING

The integrity of the landfill cover is monitored at least monthly at Shoreline. The use of the site as a recreational amphitheatre with the patrons actually sitting on the final grade of the landfill requires that the cover be no less than perfect. Shoreline employs a full-time grounds maintenance team that continuously monitors and makes any necessary repairs to the landfill cover to ensure its continuous integrity.

Additionally, a full inspection of the grounds is conducted prior to each event during the concert season and at least monthly during the remainder of the year. This monitoring schedule complies with and far exceeds the BAAQMD Rule 8-34-510, NSPS, and NESHAP schedule requirement of monthly and quarterly monitoring. Monthly cover integrity monitoring for purposes of BAAQMD Rule 8-34 was conducted on June 1, 2023, July 26, 2023, August 24, 2023, September 21, 2023, October 26, 2023, and November 7, 2023. Surface emissions and cover integrity monitoring results indicate that the final cover, which includes a geomembrane, is intact and without leaks.

## 3.8 GAS GENERATION ESTIMATE

Shoreline is a small portion of the larger City of Mountain View Landfill, specifically the northeast edge of the Vista Site. Shoreline includes approximately 10 acres of the 84-acre Vista Site; however, it only represents one slope of the landfill, so the actual percentage of refuse is expected to be approximately 5% of the entire Vista Site. The LFG generation rate for the Vista portion of the Mountain View Landfill was estimated using the U.S. Environmental Protection Agency (EPA) and is provided in **Appendix D**.

As of November 30, 2021, all LFG collected at Shoreline is routed to the City of Mountain View's flare station.

## **3.9 ANNUAL WASTE ACCEPTANCE RATE AND REFUSE IN PLACE**

As discussed in Section 3.8, Shoreline is a small portion of the City of Mountain View Landfill, specifically the northeast edge of the Vista Site. The Landfill has not accepted waste since 1986. Detailed records for annual acceptance rates and refuse-in-place totals for the Mountain View Landfill are kept by the City of Mountain View. Shoreline currently has approximately 366,000 tons or less of refuse in place.

### **3.9.1 Non-Degradable Waste Areas**

There are no landfill areas that are excluded from the collection system requirements. No areas of non-degradable waste deposition are known to exist.

## Tables

Table 1. Well Oxygen Exceedances  
 Shoreline Amphitheatre, Mountain View, CA  
 June 1, 2023 through November 30, 2023

Well	Initial Monitoring Date	Initial O2 Reading (% by vol)	5-Day Corrective Action	5-Day Corrective Action Date	5-Day Corrective Action O2 Reading (% by vol)	15-Day Retest	15-Day O2 Reading (% by vol)
EW-10*	10/26/2023	9.1	Valve Adjustment	10/26/2023	9.6	11/7/2023	0.3

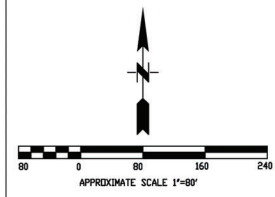
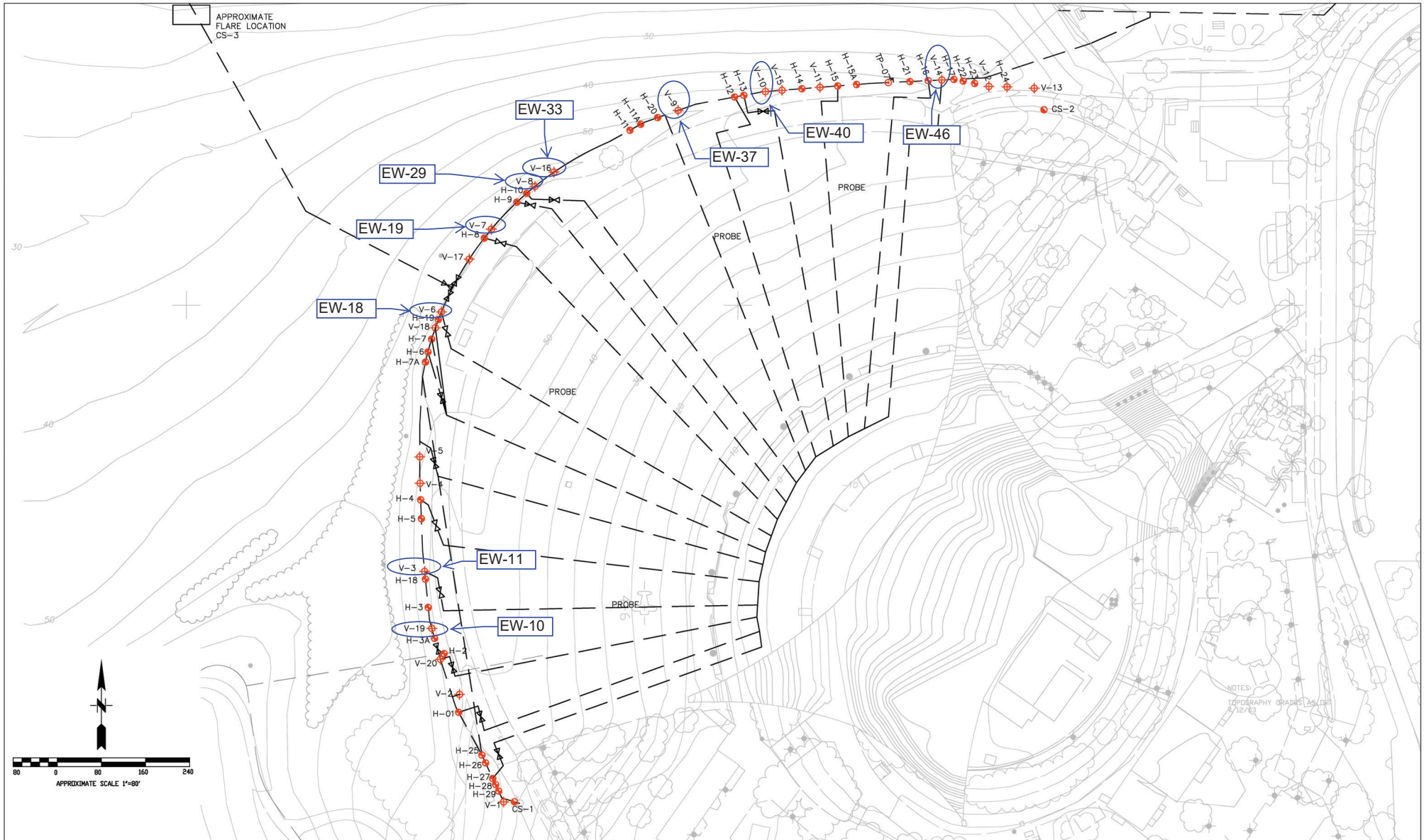
\* Wells were corrected within 15-day period.

**Table 1. Average Monthly Flow Meter Readings  
Shoreline Amphitheatre, Mountain View, CA  
June 1, 2023 through November 30, 2023**

<b>Month</b>	<b>Methane Content (%)</b>	<b>Average LFG Flow (scfm)</b>	<b>Average LFG Flow at 50% Methane (scfm)</b>
Jun-23	40.0	9.0	7.2
Jul-23	46.8	9.0	8.4
Aug-23	49.6	9.8	9.7
Sep-23	51.2	9.8	10.0
Oct-23	53.8	8.9	9.6
Nov-23	60.9	9.2	11.2
<b>Average During Reporting Period</b>	<b>50.4</b>	<b>9.3</b>	<b>9.4</b>

Appendix A  
LFG Collection and Control System Figure





**ABBREVIATION**  
 TC TEST PILE  
 CS CONDENSATE SUMP  
 H HORIZONTAL COLLECTOR  
 V VERTICAL

**LEGEND**  
 — EXISTING HEADER AND LATERAL LINES  
 ● LFG VERTICAL EXTRACTION WELL  
 ● LFG HORIZONTAL EXTRACTION WELL  
 ● LFG TEST PIT  
 ● LFG CONDENSATE SUMP

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**THE SHORELINE AMPHITHEATRE**  
 CITY OF MOUNTAIN VIEW

SHEET TITLE	LFG COLLECTION SYSTEM	NO.	REVISION	DATE	DATE: 12/17/04
PROJECT TITLE	SHORELINE AMPHITHEATRE LANDFILL	△			SCALE: 1"=80'
		△			DRAWING NO.
		△			
		△			
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NOTES  
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Appendix B  
Quarterly Component Leak Monitoring Results

**Component Emissions Monitoring Results  
Shoreline Amphitheatre, Mountain View, California**

<b>Field Technician and Weather Conditions</b>				
<b>Technician</b>	<b>Date</b>	<b>Ambient Temp</b>	<b>Barometric Pressure (in - Hg)</b>	<b>General Weather</b>
Emmanuel Paz	09/06/2023	81	30.0	Clear
		<b>Wind Speed</b>	<b>Wind Direction</b>	
		3 to 5 mph	W	
<b>Name</b>		<b>Valve Vault (ppm)</b>	<b>Test Port Vault (ppm)</b>	<b>Re-Testing</b>
EW-10	09/06/2023	5	5	None
EW-11	09/06/2023	3	3	None
EW-18	09/06/2023	2	2	None
EW-19	09/06/2023	3	3	None
EW-29	09/06/2023	4	4	None
EW-33	09/06/2023	1	1	None
EW-37	09/06/2023	1	1	None
EW-40	09/06/2023	2	2	None
EW-46	09/06/2023	1	1	None



**Component Emissions Monitoring Results  
Shoreline Amphitheatre, Mountain View, California**

<b>Field Technician and Weather Conditions</b>				
<b>Technician</b>	<b>Date</b>	<b>Ambient Temp</b>	<b>Barometric Pressure (in - Hg)</b>	<b>General Weather</b>
Emmanuel Paz	10/12/2023	73	29.8	Clear
		<b>Wind Speed</b>	<b>Wind Direction</b>	
		4 mph	S	
<b>Name</b>		<b>Valve Vault (ppm)</b>	<b>Test Port Vault (ppm)</b>	<b>Re-Testing</b>
EW-10	10/12/2023	4	4	None
EW-11	10/12/2023	2	2	None
EW-18	10/12/2023	3	3	None
EW-19	10/12/2023	2	2	None
EW-29	10/12/2023	2	2	None
EW-33	10/12/2023	2	2	None
EW-37	10/12/2023	1	1	None
EW-40	10/12/2023	1	1	None
EW-46	10/12/2023	2	2	None



Appendix C  
Well Monitoring Data

## Shoreline Amphitheatre - Well Data - 06/01/2023 to 11/30/2023

Point Name	Record Date	CH4 (% by vol)	CO2 (% by vol)	O2 (% by vol)	Bal Gas (% by vol)	Init Temp (F)	Adj Temp (F)	Init Static Pressure ("H2O)	Adj Static Pressure ("H2O)	Init Flow (scfm)	Adj Flow (scfm)	System Pressure ("H2O)	Comments
EW-10	6/30/2023 10:17	66.90	33.00	0.10	0.00	76.50	76.40	-0.10	-0.11			0.00	
EW-10	7/26/2023 09:51	66.30	33.70	0.00	0.00	73.20	72.70	-0.11	-0.11			-0.01	
EW-10	8/24/2023 10:11	65.50	34.50	0.00	0.00	75.20	74.50	-0.04	-0.05			0.00	
EW-10	9/21/2023 10:08	65.70	34.30	0.00	0.00	69.70	68.90	-0.11	-0.17			0.09	
EW-10	10/26/2023 12:31	34.40	17.90	9.10	38.60	56.00	55.80	-0.16	-0.14			0.00	
EW-10	10/26/2023 13:33	34.20	17.90	9.60	38.30	71.10	71.80	-0.10	-0.06			0.02	Valve Adjustment:Closed Valve 1/2 turn or less
EW-10	10/26/2023 13:43	35.50	18.40	9.00	37.10	66.70	66.60	-0.08	-0.09			0.00	Valve Adjustment:No Change
EW-10	11/7/2023 10:07	58.90	31.30	0.30	9.50	65.30	64.80	-0.14	-0.14			0.08	
EW-11	6/30/2023 10:20	63.60	35.20	0.30	0.90	76.70	76.50	-0.14	-0.15			0.00	
EW-11	7/26/2023 09:53	64.10	35.90	0.00	0.00	71.10	71.40	-0.10	-0.11			0.00	
EW-11	8/24/2023 10:17	62.80	36.90	0.00	0.30	74.30	76.30	-0.11	-0.10			0.00	
EW-11	9/21/2023 10:10	63.50	36.30	0.00	0.20	68.80	68.60	-0.13	-0.14			0.06	
EW-11	10/26/2023 12:38	52.40	29.90	3.30	14.40	56.90	56.90	-0.12	-0.11			0.00	
EW-11	11/7/2023 10:03	51.80	29.30	3.60	15.30	70.20	70.20	-0.13	-0.13			0.00	
EW-18	6/30/2023 10:28	63.50	35.30	0.00	1.20	87.00	88.90	-0.13	-0.14			0.00	
EW-18	7/26/2023 09:58	63.10	36.50	0.00	0.40	82.80	84.10	-0.10	-0.11			0.00	
EW-18	8/24/2023 10:22	62.70	37.10	0.00	0.20	81.70	81.40	-0.17	-0.07			0.00	
EW-18	9/21/2023 10:15	62.90	37.00	0.00	0.10	70.80	70.80	-0.16	-0.13			0.12	
EW-18	10/26/2023 12:44	61.10	37.60	0.00	1.30	57.70	57.60	-0.11	-0.10			0.00	
EW-18	11/7/2023 09:56	61.30	37.90	0.00	0.80	63.10	63.10	-0.13	-0.13			0.02	
EW-19	6/30/2023 10:31	63.00	36.60	0.10	0.30	87.30	85.70	-0.13	-0.11			0.00	
EW-19	7/26/2023 10:01	63.20	36.80	0.00	0.00	86.40	87.80	-0.10	-0.10			0.00	
EW-19	8/24/2023 10:25	62.10	37.20	0.30	0.40	80.30	80.30	-0.12	-0.10			0.00	
EW-19	9/21/2023 10:17	63.00	37.00	0.00	0.00	70.30	70.60	-0.14	-0.13			0.23	
EW-19	10/26/2023 12:51	66.40	33.30	0.00	0.30	57.50	57.60	-0.11	-0.12			0.00	
EW-19	11/7/2023 09:54	66.20	33.50	0.00	0.30	62.80	63.20	-0.15	-0.15			0.00	
EW-29	6/30/2023 10:44	62.30	37.60	0.10	0.00	85.00	86.00	-0.10	-0.11			0.00	
EW-29	7/26/2023 10:08	62.10	37.30	0.00	0.60	84.10	84.80	-0.11	-0.13			0.00	
EW-29	8/24/2023 10:37	62.30	36.80	0.00	0.90	92.20	91.00	-0.08	-0.12			0.00	
EW-29	9/21/2023 10:25	62.60	36.90	0.00	0.50	78.60	76.70	-0.12	-0.12			0.23	
EW-29	10/26/2023 12:57	61.60	37.00	0.00	1.40	58.20	58.30	-0.12	-0.14			0.00	
EW-29	11/7/2023 09:45	61.50	37.40	0.00	1.10	63.60	64.80	-0.15	-0.14			0.23	
EW-33	6/30/2023 10:47	60.30	37.50	0.10	2.10	71.40	70.00	-0.10	-0.10			0.00	
EW-33	7/26/2023 10:11	59.80	38.60	0.00	1.60	68.80	68.20	-0.12	-0.13			0.00	
EW-33	8/24/2023 10:40	59.30	39.00	0.00	1.70	76.10	76.30	-0.06	-0.11			0.00	
EW-33	9/21/2023 10:28	60.10	38.20	0.00	1.70	69.10	69.30	-0.12	-0.12			0.24	
EW-33	10/26/2023 13:01	59.50	39.50	0.00	1.00	58.90	58.90	-0.10	-0.11			0.00	
EW-33	11/7/2023 09:39	59.60	39.40	0.00	1.00	60.40	60.60	-0.15	-0.15			0.04	



## Shoreline Amphitheatre - Well Data - 06/01/2023 to 11/30/2023

Point Name	Record Date	CH4 (% by vol)	CO2 (% by vol)	O2 (% by vol)	Bal Gas (% by vol)	Init Temp (F)	Adj Temp (F)	Init Static Pressure ("H2O)	Adj Static Pressure ("H2O)	Init Flow (scfm)	Adj Flow (scfm)	System Pressure ("H2O)	Comments
EW-37	6/30/2023 10:51	62.40	36.60	0.10	0.90	69.90	69.90	-0.10	-0.10			0.00	
EW-37	7/26/2023 10:13	62.40	37.60	0.00	0.00	69.00	68.30	-0.13	-0.13			0.00	
EW-37	8/24/2023 10:42	62.40	37.60	0.00	0.00	74.90	75.40	-0.08	-0.10			0.00	
EW-37	9/21/2023 10:30	62.10	37.90	0.00	0.00	68.90	68.00	-0.16	-0.16			0.18	
EW-37	10/26/2023 13:03	61.50	37.70	0.00	0.80	59.40	59.60	-0.10	-0.10			0.00	
EW-37	11/7/2023 09:36	61.40	37.30	0.00	1.30	60.60	60.60	-0.18	-0.18			0.00	
EW-40	6/30/2023 10:54	62.80	37.00	0.10	0.10	70.30	70.00	-0.12	-0.13			0.00	
EW-40	7/26/2023 10:15	61.20	36.20	0.10	2.50	69.20	69.50	-0.13	-0.15			0.00	
EW-40	8/24/2023 10:45	60.30	35.70	0.20	3.80	75.10	75.00	-0.12	-0.15			0.00	
EW-40	9/21/2023 10:33	61.80	36.60	0.00	1.60	65.70	65.30	-0.13	-0.12			0.18	
EW-40	10/26/2023 13:06	60.30	37.80	0.00	1.90	62.30	63.30	-0.10	-0.11			0.00	
EW-40	11/7/2023 09:33	61.30	36.50	0.00	2.20	60.00	60.10	-0.16	-0.15			0.00	
EW-46	6/30/2023 10:57	66.00	33.90	0.00	0.10	78.20	76.70	-0.11	-0.10			0.00	
EW-46	7/26/2023 10:17	65.20	32.90	0.00	1.90	73.70	72.90	-0.10	-0.12			0.00	
EW-46	8/24/2023 10:49	65.00	33.00	0.00	2.00	77.30	77.40	-0.14	-0.15			0.00	
EW-46	9/21/2023 10:36	66.30	33.50	0.00	0.20	65.50	65.60	-0.16	-0.16			0.04	
EW-46	10/26/2023 13:11	65.00	33.30	0.00	1.70	60.10	60.20	-0.86	-0.93			0.00	
EW-46	11/7/2023 09:30	66.50	33.30	0.00	0.20	60.60	60.80	-0.16	-0.15			0.00	



## Shoreline Amphitheatre - Weather Data - 06/01/2023 to 11/30/2023

Record Date	Barometric Pressure	Ambient Temp	Precipitation	Wind Speed	Wind Direction	General Weather	Field Technician
6/30/2023	29.88	79.00	0.00	10.00	N	Clear	Mike Yes
7/26/2023	29.96	73.00	0.00	12.00	NW	Clear	Mike Yes
8/24/2023	29.99	82.00	0.00	9.00	SW	Clear	Mike Yes
9/21/2023	29.86	73.00	0.00	9.00	N	Clear	Mike Yes
10/26/2023	30.06	50.00	0.00	8.00	SE	Partly cloudy	Ramon Tejada
11/7/2023	30.13	60.00	0.00	8.00	SE	Clear	Ramon Tejada
11/9/2023	30.17	66.00	0.00	6.00	NW	Clear	Mike Yes





## Appendix D

### Projected LFG and NMOC Generation Rates – Mountain View (Vista)

**PROJECTED LFG AND NMOC GENERATION RATES  
CITY OF MOUNTAINVIEW LANDFILL, MOUNTAIN VIEW, CALIFORNIA**

Year	Disposal Rate (tons/yr)	Refuse In-Place (tons)	Disposal Rate (Mg/yr)	Refuse In-Place (Mg)	Methane Generation Rates (m <sup>3</sup> /yr)	LFG Generation Rates (cfm) (Million ft <sup>3</sup> /yr)	NMOC Generation Rates (tons/yr)	NMOC Generation Rates (Mg/yr)
1968	0	0	0	0	0.000E+00	0	0	0
1969	0	0	0	0	0.000E+00	0	0	0
1970	0	0	0	0	0.000E+00	0	0	0
1971	0	0	0	0	0.000E+00	0	0	0
1972	0	0	0	0	0.000E+00	0	0	0
1973	0	0	0	0	0.000E+00	0	0	0
1974	0	0	0	0	0.000E+00	0	0	0
1975	0	0	0	0	0.000E+00	0	0	0
1976	0	0	0	0	0.000E+00	0	0	0
1977	0	0	0	0	0.000E+00	0	0	0
1978	0	0	0	0	0.000E+00	0	0	0
1979	0	0	0	0	0.000E+00	0	0	0
1980	0	0	0	0	0.000E+00	0	0	0
1981	261,619	0	237,337	0	0.000E+00	0	0	0
1982	266,852	261,619	242,084	237,337	8.065E+05	108	57	25
1983	272,189	528,471	246,926	479,421	1.613E+06	217	114	50
1984	277,632	800,660	251,864	726,347	2.420E+06	325	171	75
1985	283,185	1,078,292	256,901	978,210	3.228E+06	434	228	100
1986	288,849	1,361,477	262,039	1,235,111	4.037E+06	543	285	125
1987	294,626	1,650,326	267,280	1,497,151	4.848E+06	651	342	151
1988	300,518	1,944,952	272,625	1,764,431	5.660E+06	761	400	176
1989	306,529	2,245,470	278,078	2,037,056	6.474E+06	870	457	201
1990	312,659	2,551,999	283,639	2,315,135	7.291E+06	980	515	227
1991	318,912	2,864,658	289,312	2,598,774	8.110E+06	1,090	573	252
1992	325,291	3,183,570	295,099	2,888,086	8.933E+06	1,200	631	278
1993	331,797	3,508,861	301,001	3,183,185	9.759E+06	1,311	689	303
1994	0	3,840,658	0	3,484,186	1.059E+07	1,423	748	329
1995	0	3,840,658	0	3,484,186	1.038E+07	1,395	733	323
1996	0	3,840,658	0	3,484,186	1.017E+07	1,367	719	316
1997	0	3,840,658	0	3,484,186	9.972E+06	1,340	704	310
1998	0	3,840,658	0	3,484,186	9.774E+06	1,313	690	304
1999	0	3,840,658	0	3,484,186	9.581E+06	1,287	677	298
2000	0	3,840,658	0	3,484,186	9.391E+06	1,262	663	292
2001	0	3,840,658	0	3,484,186	9.205E+06	1,237	650	286
2002	0	3,840,658	0	3,484,186	9.023E+06	1,212	637	280
2003	0	3,840,658	0	3,484,186	8.844E+06	1,188	625	275
2004	0	3,840,658	0	3,484,186	8.669E+06	1,165	612	269
2005	0	3,840,658	0	3,484,186	8.497E+06	1,142	600	264
2006	0	3,840,658	0	3,484,186	8.329E+06	1,119	588	259
2007	0	3,840,658	0	3,484,186	8.164E+06	1,097	577	254
2008	0	3,840,658	0	3,484,186	8.002E+06	1,075	565	249
2009	0	3,840,658	0	3,484,186	7.844E+06	1,054	554	244
2010	0	3,840,658	0	3,484,186	7.689E+06	1,033	543	239
2011	0	3,840,658	0	3,484,186	7.536E+06	1,013	532	234
2012	0	3,840,658	0	3,484,186	7.387E+06	993	522	230
2013	0	3,840,658	0	3,484,186	7.241E+06	973	511	225
2014	0	3,840,658	0	3,484,186	7.098E+06	954	501	221
2015	0	3,840,658	0	3,484,186	6.957E+06	935	491	216
2016	0	3,840,658	0	3,484,186	6.819E+06	916	482	212
2017	0	3,840,658	0	3,484,186	6.684E+06	898	472	208
2018	0	3,840,658	0	3,484,186	6.552E+06	880	463	204
2019	0	3,840,658	0	3,484,186	6.422E+06	863	454	200
2020	0	3,840,658	0	3,484,186	6.295E+06	846	445	196
2021	0	3,840,658	0	3,484,186	6.170E+06	829	436	192
2022	0	3,840,658	0	3,484,186	6.048E+06	813	427	188
2023	0	3,840,658	0	3,484,186	5.928E+06	797	419	184
2024	0	3,840,658	0	3,484,186	5.811E+06	781	410	181
2025	0	3,840,658	0	3,484,186	5.696E+06	765	402	177
2026	0	3,840,658	0	3,484,186	5.583E+06	750	394	174
2027	0	3,840,658	0	3,484,186	5.473E+06	735	387	170
2028	0	3,840,658	0	3,484,186	5.364E+06	721	379	167

ESTIMATED NMOC CONCENTRATION IN LFG: 4000 ppmv  
 ASSUMED METHANE CONTENT OF LFG: 50%  
 SELECTED DECAY RATE CONSTANT: 0.02  
 SELECTED ULTIMATE METHANE RECOVERY RATE: 5,443 ft<sup>3</sup>/ton  
 METRIC EQUIVALENT: 169.9 cu m/Mg

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# SHORELINE AMPHITHEATRE

## TITLE V SEMI-ANNUAL MONITORING REPORT

<b>SITE:</b> SHORELINE AMPHITHEATRE	<b>FACILITY ID#:</b> A2561
<b>REPORTING PERIOD:</b> <i>from</i> 06/01/2023 <i>through</i> 11/30/2023	

### List of Permitted Sources and Abatement Device

Permit Unit Number	Equipment Description
S-1	Landfill and Gas Collection System
S-3	Diesel Engine for Emergency Standby Generator
A-1	Carbon Adsorption System
A-2	Landfill Gas Flare
Standard Conditions	Reporting Requirements

A Compliance and Enforcement Agreement, dated September 29, 2019, between Live Nation, the BAAQMD, and the City of Mountain View requires the landfill gas (LFG) collection and control system (GCCS) to be reconfigured to transport LFG from the Shoreline Amphitheatre collection system directly to the City of Mountain View's flare station instead of directing the LFG to the CAS. As required by the September 2019 Compliance and Enforcement Agreement, SCS submitted a proposed plan for implementing the project on November 27, 2019. Brenda Cabral of the BAAQMD provided notification of District approval of the Plan via email on March 24, 2020. On May 5, 2020, SCS submitted a permit application on behalf of Live Nation to the BAAQMD to apply for the necessary permits to reconfigure the GCCS to the City of Mountain View's flare station. The Authority to Construct (ATC) permit was issued by the BAAQMD on February 1, 2021. The City of Mountain View required Live Nation to obtain a building permit prior to commencing construction. The building permit was received on June 17, 2021. GCCS construction activities began August 2021 and concluded in November 2021. As of November 30, 2021, LFG from Shoreline is routed to the City of Mountain View's flare station and the A-2 flare and CAS are no longer in operation.

# SHORELINE AMPHITHEATRE

## TITLE V SEMI-ANNUAL MONITORING REPORT

<b>Site:</b> Shoreline Amphitheatre	<b>Facility ID#:</b> A2561
<b>Permitted Unit:</b> S-1 – Landfill Gas Collection System	<b>Reporting Period:</b> from 06/01/2023 through 11/30/2023

Type of Limit or Criteria	Monitoring Requirement Citation	Parameters Monitored	Monitoring Frequency	Citation of Limit	Limit	Compliance Summary	Corrective Actions Taken
Collection System Installation Dates	BAAQMD 8-34-501.7 and 501.8	Records	Periodic / Event Basis	BAAQMD 8-34-304.1	For Inactive / Closed Areas: collection system components must be installed and operating by 2 years + 60 days after initial placement	Continuous	N/A
Gas Flow	BAAQMD 8-34-501.10 and 508	Gas Flow Meter and Recorder (every 15 minutes) – <i>N/A control devices were decommissioned as of November 30, 2021</i>	Continuous	BAAQMD 8-34-301.1	Landfill gas collection system shall operate continuously and all collected gases shall be vented to a properly operating control system	Continuous	N/A
Gas Flow	BAAQMD Condition # 876, Parts 10,11, and 18b-e and BAAQMD Regulation 8-34-501.1 and 8-34-501.2	Gas Flow Meter, Flare Alarms, and Records of Landfill Gas Flow Rates, Collection and Control Systems Downtime, and Collection System Components – <i>N/A control devices were decommissioned as of November 30, 2021</i>	Periodic / Daily	BAAQMD Condition # 876, Parts 3 and 4	Landfill gas collection system shall operate continuously and all collected gases shall be vented to a properly operating control system	Continuous	N/A
Collection and Control Systems Shutdown Time	BAAQMD Condition # 876, Parts 18b, 18d, and 18e and BAAQMD 8-34-501.1	Operating Records – <i>N/A control devices were decommissioned as of November 30, 2021</i>	Periodic / Daily	BAAQMD 8-34-113.2	≤240 hours/year and 5 consecutive days	Continuous	N/A

# SHORELINE AMPHITHEATRE

## TITLE V SEMI-ANNUAL MONITORING REPORT

<b>Site:</b> Shoreline Amphitheatre	<b>Facility ID#:</b> A2561
<b>Permitted Unit:</b> S-1 – Landfill Gas Collection System	<b>Reporting Period:</b> from 06/01/2023 through 11/30/2023

Type of Limit or Criteria	Monitoring Requirement Citation	Parameters Monitored	Monitoring Frequency	Citation of Limit	Limit	Compliance Summary	Corrective Actions Taken
Periods of In-operation for Parametric Monitors	BAAQMD 1-523.4	Operating Records for All Parametric Monitors	Periodic / Daily	BAAQMD 1-523.2	≤15 consecutive days/incident and ≤30 days/12 month period	Continuous	N/A
Continuous monitors	40 CFR 60.7(b)	Operating Records for All Continuous Monitors – <i>N/A control devices were decommissioned as of November 30, 2021</i>	Periodic / Daily	40 CFR 60.13(e)	Requires Continuous Operation except for breakdowns, repairs, calibration, and required span adjustments	Continuous	N/A
Wellhead Pressure	BAAQMD 8-34-414, 501.9 and 505.1 and BAAQMD Condition # 876, Part 18i	Monthly Inspection and Records	Periodic / Monthly	BAAQMD 8-34-305.1 and BAAQMD Condition #876, Part 3b	< 0 psig (applies to each well or collector connected to vacuum)	Continuous	N/A
Temperature of Gas at Wellhead	BAAQMD 8-34-414, 501.9 and 505.2 and BAAQMD Condition # 876, Part 18i	Monthly Inspection and Records	Periodic / Monthly	BAAQMD 8-34-305.2 and BAAQMD Condition #876, Part 3b	<55°C (131°F) (applies to each well or collector connected to vacuum)	Continuous	N/A
Gas Concentrations at Wellhead	BAAQMD Condition # 876, Part 3d –e and 18i	Monthly Inspection and Records	Periodic / Monthly	BAAQMD Condition #876, Part 3c(i)	O <sub>2</sub> ≤ 15% by volume (applies to all wells and collectors connected to vacuum, except as described in Part 3c (ii-iii))	Continuous	N/A
Collection System Component	BAAQMD Condition # 876, Parts 3d-e and	Monthly Inspection and Records. <i>Note: As of November 30, 2021, only</i>	Periodic / Monthly	BAAQMD 8-34-404 and BAAQMD Condition # 876, Part	≥20 wells and collectors operating continuously at any one time and re-	Continuous	N/A

# SHORELINE AMPHITHEATRE

## TITLE V SEMI-ANNUAL MONITORING REPORT

<b>Site:</b> Shoreline Amphitheatre	<b>Facility ID#:</b> A2561
<b>Permitted Unit:</b> S-1 – Landfill Gas Collection System	<b>Reporting Period:</b> from 06/01/2023 through 11/30/2023

Type of Limit or Criteria	Monitoring Requirement Citation	Parameters Monitored	Monitoring Frequency	Citation of Limit	Limit	Compliance Summary	Corrective Actions Taken
Operating Requirements	18i	<i>nine wells remain connected to the GCCS to convey LFG to the City of Mountain View flare station.</i>		3a(i & iii)	connect wells and collectors to vacuum when wellhead CH <sub>4</sub> > 20% by volume		
Well Shutdown Limits	BAAQMD 8-34-117.6 and 501.1	Records	Periodic / Daily	BAAQMD 8-34-117.4	No more than 5 wells at a time or 10% of total collection system, whichever is less	Continuous	N/A
Well Shutdown Limits	BAAQMD 8-34-117.6 and 501.1	Records	Periodic / Daily	BAAQMD 8-34-117.5	≤24 hours per well	Continuous	N/A
TOC (Total Organic Compounds Plus Methane)	BAAQMD 8-34-501.6 and 503 and BAAQMD Condition # 876, Part 18i	Quarterly Inspection of Collection and Control System Components with Portable Analyzer and Records	Periodic / Quarterly	BAAQMD 8-34-301.2	≤1000 ppmv as methane (component leak limit)	Continuous	N/A
Surface emission monitoring (TOC)	BAAQMD 8-34-415, 416, 501.6, 506 and 510 and BAAQMD Condition # 876, Part 18i	Monthly cover visual inspection of Cover; Quarterly Inspection with Portable Analyzer of Surface, Various Reinspection Times for Leaking Areas and Records	Periodic / Monthly, Quarterly, and Event Basis	BAAQMD 8-34-303	≤500 ppmv as methane at 2 inches above surface (surface leak limit)	Continuous	N/A
H <sub>2</sub> S	None	N/A	None	BAAQMD 9-2-301	Property Line Ground Level Limits: ≤0.06 ppm, averaged over 3 minutes and ≤0.03 ppm,	Continuous	N/A

# SHORELINE AMPHITHEATRE

## TITLE V SEMI-ANNUAL MONITORING REPORT

<b>Site:</b> Shoreline Amphitheatre	<b>Facility ID#:</b> A2561
<b>Permitted Unit:</b> S-1 – Landfill Gas Collection System	<b>Reporting Period:</b> from 06/01/2023 through 11/30/2023

Type of Limit or Criteria	Monitoring Requirement Citation	Parameters Monitored	Monitoring Frequency	Citation of Limit	Limit	Compliance Summary	Corrective Actions Taken
					averaged over 60 minutes.		
Amount of Waste Accepted	BAAQMD Regulation 8-34-501.7	Records	Periodic / Annual	BAAQMD Condition # 876, Part 1	0 tons/day and ≤366,000 tons (cumulative amount of all wastes) and ≤542,000 yd <sup>3</sup> (cumulative amount of all wastes and cover materials)	Continuous	N/A
Startup Shutdown or Malfunction Procedures	40 CFR 63.1980(a-b)	Records (all occurrences, duration of each, corrective actions)	Periodic/Event Basis	40 CFR 63.6(e)	Minimize Emissions by Implementing SSM Plan	Continuous	N/A



# SHORELINE AMPHITHEATRE

## TITLE V SEMI-ANNUAL MONITORING REPORT

<b>Site:</b> Shoreline Amphitheatre	<b>Facility ID#:</b> A2561
<b>Permitted Unit:</b> A-2 – Landfill Gas Flare	<b>Reporting Period:</b> from 06/01/2023 through 11/30/2023

Type of Limit or Criteria	Monitoring Requirement Citation	Parameters Monitored	Monitoring Frequency	Citation of Limit	Limit	Compliance Summary	Corrective Actions Taken
Non-Methane Organic Compounds (NMOC)	BAAQMD 8-34-412 and 501.4 and BAAQMD Condition # 876, Parts 16 and 18i	Source Tests and Records  <i>N/A control devices were decommissioned as of November 30, 2021</i>	Periodic / Annual	BAAQMD 8-34-301.3	≥98% removal by weight OR < 30 ppmv, dry basis @ 3% O <sub>2</sub> , expressed as methane (applies to A-2 Landfill Gas Flare only)	Continuous	N/A
Temperature of Combustion Zone (CT)	BAAQMD 8-34-501.3 and 507 and SIP 8-34-501.3 and BAAQMD Condition # 876, Part 9	Temperature Sensor and Recorder (continuous)  <i>N/A control devices were decommissioned as of November 30, 2021</i>	Continuous	BAAQMD Condition # 876, Part 8a	CT ≥1400°F, averaged over any 3-hour period (applies to A-2 Landfill Gas Flare when A-2 is operated alone)	Continuous	N/A
Temperature of Combustion Zone (CT)	BAAQMD 8-34-501.3 and 507 and SIP 8-34-501.3 and BAAQMD Condition # 876, Part 9	Temperature Sensor and Recorder (continuous)  <i>N/A control devices were decommissioned as of November 30, 2021</i>	Continuous	BAAQMD Condition # 876, Part 8b	CT ≥1200°F, averaged over any 3-hour period (applies to A-2 Landfill Gas Flare when A-2 is down stream of A-1)	Continuous	N/A
Opacity	None	N/A	None	BAAQMD 6-1-301	Ringlemann No. 1 for <3 minutes/hour (applies to A-1 Carbon Adsorption System and A-2 Landfill Gas Flare)	Continuous	N/A
FP	None	N/A	None	BAAQMD 6-1-310	≤0.15 grains/dscf (applies to A-1 Carbon Adsorption System and A-2 Landfill Gas Flare)	Continuous	N/A

# SHORELINE AMPHITHEATRE

## TITLE V SEMI-ANNUAL MONITORING REPORT

<b>Site:</b> Shoreline Amphitheatre	<b>Facility ID#:</b> A2561
<b>Permitted Unit:</b> A-2 – Landfill Gas Flare	<b>Reporting Period:</b> from 06/01/2023 through 11/30/2023

Type of Limit or Criteria	Monitoring Requirement Citation	Parameters Monitored	Monitoring Frequency	Citation of Limit	Limit	Compliance Summary	Corrective Actions Taken
SO <sub>2</sub>	None	N/A	None	BAAQMD 9-1-301	Property Line Ground Level Limits: ≤0.5 ppmb for 3 minutes and ≤0.25 ppm for 60 min. and ≤0.05 ppm for 24 hours (applies to A-2 Landfill Gas Flare only)	Continuous	N/A
SO <sub>2</sub>	BAAQMD Condition # 876, Parts 16g, or 17 and 18h-i	Annual TRS Analysis of Landfill Gas, or Annual SO <sub>2</sub> Test at Flare, and Records  <i>N/A control devices were decommissioned as of November 30, 2021</i>	Periodic/ Annual	BAAQMD Regulation 9-1-302	≤ 300 ppm (dry basis) (applies to A-2 Landfill Gas Flare only)	Continuous	N/A
Total Sulfur Content in Landfill Gas	BAAQMD Condition # 876, Parts 17 and 18h-i	Annual TRS Analysis of Landfill Gas and Records  <i>N/A control devices were decommissioned as of November 30, 2021</i>	Periodic/ Annual	BAAQMD Condition # 876, Part 15	≤1300 ppmv, express as H <sub>2</sub> S	Continuous	N/A
Heat Input	BAAQMD Condition # 876, Parts 11, 18c, 18e, and 18f	Gas Flow Meter and Records  <i>N/A control devices were decommissioned as of November 30, 2021</i>	Periodic / Continuous, Monthly	BAAQMD Condition # 876, Parts 5	≤86.4 MM BTU per day and ≤31,536 MM BTU per year (applies to A-2 landfill Gas Flare only)	Continuous	N/A

# SHORELINE AMPHITHEATRE

## TITLE V SEMI-ANNUAL MONITORING REPORT

<b>Site:</b> Shoreline Amphitheatre	<b>Facility ID#:</b> A2561
<b>Permitted Unit:</b> A-2 – Landfill Gas Flare	<b>Reporting Period:</b> from 06/01/2023 through 11/30/2023

Type of Limit or Criteria	Monitoring Requirement Citation	Parameters Monitored	Monitoring Frequency	Citation of Limit	Limit	Compliance Summary	Corrective Actions Taken
NO <sub>x</sub>	BAAQMD Condition # 876, Parts 16d and 18i	Source Tests and Records  <i>N/A control devices were decommissioned as of November 30, 2021</i>	Annual	BAAQMD Condition # 876, Parts 6	≤30 ppmv of NO <sub>x</sub> , corrected to 15% O <sub>2</sub> , dry (applies to A-2 Landfill Gas Flare only)	Continuous	N/A
CO	BAAQMD Condition # 876, Parts 16d and 18i	Source Tests and Records  <i>N/A control devices were decommissioned as of November 30, 2021</i>	Annual	BAAQMD Condition # 876, Parts 7	≤ 83 ppmv of CO, corrected to 15% O <sub>2</sub> , dry (applies to A-2 Landfill Gas Flare only)	Continuous	N/A

# SHORELINE AMPHITHEATRE

## TITLE V SEMI-ANNUAL MONITORING REPORT

<b>Site:</b> Shoreline Amphitheatre	<b>Facility ID#:</b> A2561
<b>Permitted Unit:</b> A-1 – Carbon Adsorption System	<b>Reporting Period:</b> from 06/01/2023 through 11/30/2023

Type of Limit or Criteria	Monitoring Requirement Citation	Parameters Monitored	Monitoring Frequency	Citation of Limit	Limit	Compliance Summary	Corrective Actions Taken
NMOC	BAAQMD 8-34-501.11 and 8-34-509 and BAAQMD Condition # 876, Parts 14 and 18g	Periodic Monitoring of A-1 Exhaust with a Portable Analyzer and Records  <i>Note: The A-1 Carbon Adsorption system was permanently decommissioned on November 30, 2021 per the ATC that was issued by the BAAQMD on February 1, 2021.</i>	Periodic / Event Basis (at least once for every 16 hours of A-1 operation; after conc. Is > 90 ppm, at least once for every 8 hours of A-1 operation)	BAAQMD 8-34-301.4	98% removal by weight OR < 120 ppmv, dry basis @ 3% O <sub>2</sub> , expressed as methane (applies to A-1 Carbon Adsorption System only)	Continuous	N/A
NMOC	BAAQMD Condition # 876, Parts 14 and 18g	Periodic Monitoring of A-1 Exhaust with a Portable Analyzer and Records  <i>Note: The A-1 Carbon Adsorption system was permanently decommissioned on November 30, 2021 per the ATC that was issued by the BAAQMD on February 1, 2021.</i>	Periodic / Event Basis (at least once for every 16 hours of A-1 operation; after conc. Is > 90 ppm, at least once for every 8 hours of A-1 operation)	BAAQMD Condition # 876, Parts 13	Replace carbon when exhaust concentration exceeds 108 ppmv, dry basis @ 3% O <sub>2</sub> , expressed as methane (applies to A-1 Carbon Adsorption System only)	Continuous	N/A

# SHORELINE AMPHITHEATRE

## TITLE V SEMI-ANNUAL MONITORING REPORT

<b>Site:</b> Shoreline Amphitheatre	<b>Facility ID#:</b> A2561
<b>Permitted Unit:</b> S-3 – Diesel Engine	<b>Reporting Period:</b> from 06/01/2023 through 11/30/2023

Type of Limit or Criteria	Monitoring Requirement Citation	Parameters Monitored	Monitoring Frequency	Citation of Limit	Limit	Compliance Summary	Corrective Actions Taken
Opacity	None	N/A	No monitoring requirement	BAAQMD 6-1-303	Ringelmann No.2 for <3 minutes/hour	Continuous	N/A
FP	None	N/A	No monitoring requirement	BAAQMD 6-1-310	≤0.15 grains/dscf	Continuous	N/A
SO <sup>2</sup>	None	N/A	No monitoring requirement	BAAQMD 9-1-301	Property Line Ground Level Limits: ≤0.5 ppm for 3 minutes and ≤0.25 ppm for 60 minn and ≤0.05 ppm for 24 hours	Continuous	N/A
Liquid Fuel Sulfur Content	BAAQMD Condition # 19912, Part 4f	Vendor certification	Periodic / Event Basis	BAAQMD Regulation 9-1-304	Fuel Sulfur Limit: 0.5% by weight	Continuous	N/A
Liquid Fuel Sulfur Content	BAAQMD Condition # 19912, Part 4f	Vendor certification	Periodic / Event Basis	CCR Title 17, Section 93115.5 9b) and CCR Title 13, Section 2281 (a)(1-5)	Standby Engines must use CARB Diesel Fuel or other CARB Approved Alternative Fuel, which has Fuel Sulfur Limits of: ≤500 ppmw of S (≤0.05% S, by weight) or ≤15 ppmw of S (for fuel sold after 6/1/06)	Continuous	N/A
Operating Hours	BAAQMD Regulation 9-8-502.1 and 9-8-530 and BAAQMD Condition # 19912, Parts 3 and 4a-d and CCR Title 17, Section 93115.10(e)(1) & (g)(1)	Meter to record either operating hours or fuel usage and records	Periodic / Continuous, Monthly	BAAQMD Condition # 19912, Part 1 and CCR Title 17, Section 93115.6(b)(3)(A)(1)(a)	Operating Hours for Reliability-Related Activities: ≤20 hours in a calendar year	Continuous	N/A

# SHORELINE AMPHITHEATRE

## TITLE V SEMI-ANNUAL MONITORING REPORT

<b>Site:</b> Shoreline Amphitheatre	<b>Facility ID#:</b> A2561
<b>Permitted Unit:</b> Standard Conditions	<b>Reporting Period:</b> <i>from 06/01/2023 through 11/30/2023</i>

Type of Limit or Criteria	Monitoring Requirement Citation	Parameters Monitored	Monitoring Frequency	Citation of Limit	Limit	Compliance Summary	Corrective Actions Taken
Monitoring Reports	BAAQMD Regulation 2-6-307 and 2-6-502	N/A	Every six (6) months	BAAQMD Regulation 2-6-307 and 2-6-502	Semi-Annual Monitoring Reports submitted on June 30 <sup>th</sup> and December 31 <sup>st</sup> of each year.	Intermittent	Dec-22 Semi-Annual Monitoring Report submitted without signature from Responsible Official. Site issued NOV No. A60942. See attachment for details.
Permit to Operate Renewal	BAAQMD Regulation 2-1-302 and 2-6-307	N/A	N/A	BAAQMD Regulation 2-1-302 and 2-6-307	Shoreline PTO must be renewed within timeframe specified in permit.	Intermittent	PTO was not renewed due to delayed submittal of data requested. Forms have since been completed. Site issued NOV No. A60941. See attachment for further details.

**SHORELINE AMPHITHEATRE**  
**TITLE V SEMI-ANNUAL MONITORING REPORT**

<b>SITE:</b> SHORELINE AMPHITHEATRE	<b>FACILITY ID#:</b> A2561
<b>REPORTING PERIOD:</b> from 06/01/2023 through 11/30/2023	

**CERTIFICATION:**

I declare, under penalty of perjury under the laws of the State of California, that, based on information and belief formed after reasonable inquiry, all information provided in this reporting package is true, accurate, and addresses all deviations during the reporting period:

  
\_\_\_\_\_  
Signature of Responsible Official

12/20/23  
\_\_\_\_\_  
Date

Jessica Hill  
Name of Responsible Official

General Manager, Shoreline Amphitheatre  
Title of Responsible Official

**Mail to:**

Director of Compliance and Enforcement  
BAAQMD  
375 Beale Street, Suite 600  
San Francisco, CA 94105  
Attn: Title V Reports

December 7, 2023

Mr. Jeffrey Gove  
Director of Compliance and Enforcement  
Bay Area Air Quality Management District  
375 Beale Street, Suite 600  
San Francisco, CA 94105

Re: 10-Day Response to Notice of Violation Numbers A60941 and A60942  
Shoreline Amphitheatre, Mountain View, California  
Facility Number A2561

Dear Mr. Gove:

On behalf of the LiveNation, SCS Engineers (SCS) is submitting this 10-Day Response to Notice of Violation (NOV) Numbers A60941 and A60942, which were issued by Bay Area Air Quality Management District (BAAQMD or Air District) Inspector, Mr. Joseph Muehleck, to Ms. Jessica Hill, General Manager of the Shoreline Amphitheatre (Shoreline), Mountain View, California (Facility No. 2561) on November 27, 2023. A copy of each NOV is provided with this letter as **Attachments**.

#### **NOV Number A60941**

NOV Number A60941, issued on November 27, 2023, alleged violations of BAAQMD Reg 2, Rule 1, Section 302 and Reg 2, Rule 6, Section 307 citing the Air District Permit to Operate (PTO), which expired on May 1, 2022. The Shoreline PTO has not been renewed due to delayed submittal of data requested via the Data Update Form. The information for calendar year 2021 was recently submitted to the Air District, which prompted reissuance of the Data Update Form for calendar year 2022. This form has likewise been completed and submitted to the Air District. LiveNation and SCS anticipate receipt of a renewed PTO subsequent to receipt and payment of an invoice for permit fees.

#### **NOV Number A60942**

NOV Number A60942, issued on November 27, 2023, alleged violations of BAAQMD Reg 2, Rule 6, Section 307 citing late or incomplete document submittal on January 1, 2023. The Shoreline PTO Condition Number 876 Part 19 states:

“The annual report required by BAAQMD Regulation 8-34-411 shall be submitted in two semi annual increments. ...The reporting periods and report submittal due dates for all subsequent increments of the Regulation 8-34-411 report [after December 31, 2003] shall be synchronized with the reporting periods and report submittal due dates for the semi annual MFR Permit monitoring reports that are required by Section I.F. of the MFR Permit for this site....”



Mr. Jeffery Gove  
December 7, 2023  
Page 2

SCS routinely prepares and submits semi-annual reports for Shoreline on behalf of LiveNation. The semi-annual report due December 31, 2022 was submitted on December 30, 2022, before the deadline. The report was, however, inadvertently submitted without the required signature from the Shoreline Responsible Official. The report certification page was subsequently signed and the report was resubmitted on November 3, 2023.

### Conclusion

We believe the delays in submittal may have been due in large part to delays in updating contact information for Shoreline as a result of multiple changes in staff at all the organizations involved with Shoreline. While LiveNation and SCS understand and appreciate the importance of prompt submittals and timely payments, we request that BAAQMD consider the impacts of staff turnover during the 2020 and 2021 calendar years covering the Covid-19 pandemic, the challenges associated with transitioning responsibilities to and communication with new staff working remotely, and the loss of clear lines of communication during this period when considering settlements for NOVs No. A60941 and A60942.

We trust that this letter satisfies the 10-day NOV response requirements specified by District regulations. Please contact Melissa St. John by telephone at (916) 406-5476 or by email at [mstjohn@scsengineers.com](mailto:mstjohn@scsengineers.com), if you have any questions or concerns.

Sincerely,



Melissa St. John  
Project Manager  
SCS Engineers



Patrick S. Sullivan, REPA, CPP, BCES  
Senior Vice President  
SCS Engineers

cc: Jessica Hill, LiveNation  
Joseph Muehleck, BAAQMD  
Art Jones, SCS  
Gabrielle F. Stephens, SCS

Attachments: NOV Numbers A60941 and A60942

## **Attachments**

NOV Numbers A60941 and A60942



BAY AREA  
AIR QUALITY  
MANAGEMENT  
DISTRICT

**BAY AREA AIR QUALITY MANAGEMENT DISTRICT**  
375 Beale Street, Suite 600, San Francisco, CA 94105  
(415) 749-5000

# NOTICE OF VIOLATION

No. **A60941**

ISSUED TO: Shoreline Amphitheatre  P  G  N# A2561  
 ADDRESS: One Amphitheatre Parkway  
 CITY: Mountain View STATE: CA ZIP: 94043  
 PHONE: (650 ) 623-3050  
 N# Mailing Address on F61

**OCCURRENCE**  
 NAME: \_\_\_\_\_  
 ADDRESS: \_\_\_\_\_  Same As Above  
 CITY: \_\_\_\_\_ ZIP: \_\_\_\_\_  
 SOURCE: S# 1, 3 NAME: Landfill w GCS, standby engine  
 EMISSION PT: P# \_\_\_\_\_ NAME: \_\_\_\_\_  
 DATE: 5/1/22 TIME: 0000 HRS

<input type="checkbox"/> REG 2 RULE 1 SEC 301 No Authority to Construct	<input checked="" type="checkbox"/> REG 2 RULE 1 SEC 302 No Permit to Operate
<input type="checkbox"/> REG 1 SEC 301 H & S CODE - 41700 Public Nuisance	<input checked="" type="checkbox"/> REG 2 RULE <sup>6</sup> SEC 307 Failure to Meet Permit Condition
<input type="checkbox"/> REG 5 SEC 301 Prohibited Open Burning	<input type="checkbox"/> REG 6 RULE 1 SEC 301 Excessive Visible Emissions
<input type="checkbox"/> REG _____ RULE _____ SECTION _____ CODE _____	<input type="checkbox"/> REG _____ RULE _____ SECTION _____ CODE _____

Details: Air District PO expired 5/1/22 (SIP Reg 2-1-302)

RECIPIENT NAME: Jessica Hill  
 TITLE: General Manager

SIGNING THIS NOTICE IS NOT AN ADMISSION OF GUILT X J. Hill

➔ WITHIN 10 DAYS, RETURN A COPY OF THIS NOTICE WITH A WRITTEN DESCRIPTION OF THE IMMEDIATE CORRECTIVE ACTION YOU HAVE TAKEN TO PREVENT CONTINUED OR RECURRENT VIOLATION. **THIS VIOLATION IS SUBJECT TO SUBSTANTIAL PENALTY.** YOUR RESPONSE DOES NOT PRECLUDE FURTHER LEGAL ACTION.

ISSUED BY: J. Muehleck (issued via email) INSP # 858  
 DATE: 11/27/23 TIME: 1145 HRS  MAILED

**PLEASE PRESS HARD**

# INSTRUCTIONS

## PERMIT VIOLATIONS - (REG 2, RULE 1, SECTION 301 AND/OR 302)

Within 30 days, a permit application must be submitted to the District's Permit Division. The permit application must reference the Violation Notice Number Shown on the front of this notice. If either the Violation Notice Number is not referenced or no permit application is received, then this matter will be referred to the District's Legal Department for legal action. Your response does not preclude further legal action.

If there are any questions regarding the submission of a Permit Application, call the Permit Services Division at (415) 749-4990.

## ALL OTHER VIOLATIONS

Within 10 days, return a copy of this notice with a written description of the corrective action you have taken to prevent continued or recurrent violation. Immediate corrective action must be taken to stop the violation. This violation is subject to substantial penalty. Your response does not preclude further legal action.

A variance should be sought if it is necessary to continue to operate in violation of District Regulations. For information on eligibility for, or filing of, a variance, call (415) 749-5073.



BAY AREA  
AIR QUALITY  
MANAGEMENT  
DISTRICT

**BAY AREA AIR QUALITY MANAGEMENT DISTRICT**  
375 Beale Street, Suite 600, San Francisco, CA 94105  
(415) 749-5000

# NOTICE OF VIOLATION

No. **A60942**

ISSUED TO: Shoreline Amphitheatre  P  G  N# A2561  
 ADDRESS: One Amphitheatre Parkway  
 CITY: Mountain View STATE: CA ZIP: 94043  
 PHONE: (650 ) 623-3050  
 N# Mailing Address on F61

OCCURRENCE  
 NAME: \_\_\_\_\_  
 ADDRESS: \_\_\_\_\_  Same As Above  
 CITY: \_\_\_\_\_ ZIP: \_\_\_\_\_  
 SOURCE: S# 1, 3 NAME: Landfill w GCS, standby engine  
 EMISSION PT: P# \_\_\_\_\_ NAME: \_\_\_\_\_  
 DATE: 1/1/23 TIME: 0000 HRS

<input type="checkbox"/> REG 2 RULE 1 SEC 301 No Authority to Construct	<input type="checkbox"/> REG 2 RULE 1 SEC 302 No Permit to Operate
<input type="checkbox"/> REG 1 SEC 301 H & S CODE - 41700 Public Nuisance	<input checked="" type="checkbox"/> REG 2 RULE <sup>6</sup> SEC 307 Failure to Meet Permit Condition
<input type="checkbox"/> REG 5 SEC 301 Prohibited Open Burning	<input type="checkbox"/> REG 6 RULE 1 SEC 301 Excessive Visible Emissions
<input type="checkbox"/> REG _____ RULE _____ SECTION _____ CODE _____	
<input type="checkbox"/> REG _____ RULE _____ SECTION _____ CODE _____	

Details: Late or incomplete document submittal

RECIPIENT NAME: Jessica Hill  
 TITLE: General Manager

SIGNING THIS NOTICE IS NOT AN ADMISSION OF GUILT  J. Hill

➔ WITHIN 10 DAYS, RETURN A COPY OF THIS NOTICE WITH A WRITTEN DESCRIPTION OF THE IMMEDIATE CORRECTIVE ACTION YOU HAVE TAKEN TO PREVENT CONTINUED OR RECURRENT VIOLATION. **THIS VIOLATION IS SUBJECT TO SUBSTANTIAL PENALTY.** YOUR RESPONSE DOES NOT PRECLUDE FURTHER LEGAL ACTION.

ISSUED BY: J. Muehleck (issued via email) INSP # 858  
 DATE: 11/27/23 TIME: 1145 HRS  MAILED

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# INSTRUCTIONS

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A variance should be sought if it is necessary to continue to operate in violation of District Regulations. For information on eligibility for, or filing of, a variance, call (415) 749-5073.