

December 31, 2025 File No. 01202092.00, Task 8

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

TV Tracking #1261 (Semi-Annual)

1. RECEIVED IN
ENFORCEMENT: 12/31/2025

**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 District (District) 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 District requirements under Rule 8-34 and the facility's Title V permit. The semi-annual reports cover the period of June 1, 2025 through December 31, 2025.

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

Sincerely,



Stipe Markotic
Staff Professional
SCS ENGINEERS



Maria Bowen
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)



SHORELINE AMPHITHEATRE

TITLE V SEMI-ANNUAL MONITORING REPORT

SITE: SHORELINE AMPHITHEATRE	FACILITY ID#: A2561
REPORTING PERIOD: <i>from</i> 06/01/2025 <i>through</i> 11/30/2025	

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 Bay Area Air District (District), 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 Carbon Adsorption System (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 District 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 District 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 District 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

Site: Shoreline Amphitheatre	Facility ID#: A2561
Permitted Unit: S-1 – Landfill Gas Collection System	Reporting Period: from 06/01/2025 through 11/30/2025

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

Site: Shoreline Amphitheatre	Facility ID#: A2561
Permitted Unit: S-1 – Landfill Gas Collection System	Reporting Period: from 06/01/2025 through 11/30/2025

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)	Intermittent	Site issued Notice of Violation (NOV) A63711 on June 18, 2025, for 3 wellheads that were not under vacuum. Response letters were submitted on June 27, 2025 and July 18, 2025. The letters are attached.
Temperature of Gas at Wellhead	BAAQMD 8-34-414, 501.9 and 505.2 and BAAQMD	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

SHORELINE AMPHITHEATRE

TITLE V SEMI-ANNUAL MONITORING REPORT

Site: Shoreline Amphitheatre	Facility ID#: A2561
Permitted Unit: S-1 – Landfill Gas Collection System	Reporting Period: from 06/01/2025 through 11/30/2025

Type of Limit or Criteria	Monitoring Requirement Citation	Parameters Monitored	Monitoring Frequency	Citation of Limit	Limit	Compliance Summary	Corrective Actions Taken
	Condition # 876, Part 18i						
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 ₂ ≤ 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 Operating Requirements	BAAQMD Condition # 876, Parts 3d-e and 18i	Monthly Inspection and Records. <i>Note: As of November 30, 2025, only nine wells remain connected to the GCCS to convey LFG to the City of Mountain View flare station.</i>	Periodic / Monthly	BAAQMD 8-34-404 and BAAQMD Condition # 876, Part 3a(i & iii)	≥20 wells and collectors operating continuously at any one time and re-connect wells and collectors to vacuum when wellhead CH ₄ > 20% by volume	Continuous	N/A
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

SHORELINE AMPHITHEATRE

TITLE V SEMI-ANNUAL MONITORING REPORT

Site: Shoreline Amphitheatre	Facility ID#: A2561
Permitted Unit: S-1 – Landfill Gas Collection System	Reporting Period: from 06/01/2025 through 11/30/2025

Type of Limit or Criteria	Monitoring Requirement Citation	Parameters Monitored	Monitoring Frequency	Citation of Limit	Limit	Compliance Summary	Corrective Actions Taken
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)	Intermittent	Site issued NOV A63710 for component leak in excess of 1,000 parts per million. Response letters were submitted on June 27, 2025 and July 18, 2025, The letters are attached.
H ₂ 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, averaged over 60 minutes.	Continuous	N/A
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 ³ (cumulative amount of all wastes and cover materials)	Continuous	N/A

SHORELINE AMPHITHEATRE

TITLE V SEMI-ANNUAL MONITORING REPORT

Site: Shoreline Amphitheatre	Facility ID#: A2561
Permitted Unit: S-1 – Landfill Gas Collection System	Reporting Period: <i>from 06/01/2025 through 11/30/2025</i>

Type of Limit or Criteria	Monitoring Requirement Citation	Parameters Monitored	Monitoring Frequency	Citation of Limit	Limit	Compliance Summary	Corrective Actions Taken
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

Site: Shoreline Amphitheatre	Facility ID#: A2561
Permitted Unit: A-2 – Landfill Gas Flare	Reporting Period: from 06/01/2025 through 11/30/2025

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 ₂ , 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

Site: Shoreline Amphitheatre	Facility ID#: A2561
Permitted Unit: A-2 – Landfill Gas Flare	Reporting Period: from 06/01/2025 through 11/30/2025

Type of Limit or Criteria	Monitoring Requirement Citation	Parameters Monitored	Monitoring Frequency	Citation of Limit	Limit	Compliance Summary	Corrective Actions Taken
SO ₂	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 ₂	BAAQMD Condition # 876, Parts 16g, or 17 and 18h-i	Annual TRS Analysis of Landfill Gas, or Annual SO ₂ 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 ₂ 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

Site: Shoreline Amphitheatre	Facility ID#: A2561
Permitted Unit: A-2 – Landfill Gas Flare	Reporting Period: from 06/01/2025 through 11/30/2025

Type of Limit or Criteria	Monitoring Requirement Citation	Parameters Monitored	Monitoring Frequency	Citation of Limit	Limit	Compliance Summary	Corrective Actions Taken
NO _x	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 _x , corrected to 15% O ₂ , 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 ₂ , dry (applies to A-2 Landfill Gas Flare only)	Continuous	N/A

SHORELINE AMPHITHEATRE

TITLE V SEMI-ANNUAL MONITORING REPORT

Site: Shoreline Amphitheatre	Facility ID#: A2561
Permitted Unit: A-1 – Carbon Adsorption System	Reporting Period: from 06/01/2025 through 11/30/2025

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 ₂ , 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 ₂ , expressed as methane (applies to A-1 Carbon Adsorption System only)	Continuous	N/A

SHORELINE AMPHITHEATRE

TITLE V SEMI-ANNUAL MONITORING REPORT

Site: Shoreline Amphitheatre	Facility ID#: A2561
Permitted Unit: S-3 – Diesel Engine	Reporting Period: from 06/01/2025 through 11/30/2025

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 ²	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

Site: Shoreline Amphitheatre	Facility ID#: A2561
Permitted Unit: Standard Conditions	Reporting Period: <i>from 06/01/2025 through 11/30/2025</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 th and December 31 st of each year.	Continuous	N/A
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.	Continuous	N/A

SHORELINE AMPHITHEATRE
TITLE V SEMI-ANNUAL MONITORING REPORT

SITE: SHORELINE AMPHITHEATRE	FACILITY ID#: A2561
REPORTING PERIOD: <i>from</i> 06/01/2025 <i>through</i> 11/30/2025	

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

12/31/25

Date

Jessica Hill
Name of Responsible Official

General Manager, Shoreline Amphitheatre
Title of Responsible Official

Mail to:

*Director of Compliance and Enforcement
Bay Area Air District
375 Beale Street, Suite 600
San Francisco, CA 94105
Attn: Title V Reports*

July 18, 2025

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

Re: 30-Day Title V Deviation Report for Notice of Violation Numbers A63710 and A63711
Shoreline Amphitheatre, Mountain View, California
Facility Number A2561

Dear Mr. Gove:

On behalf of LiveNation, SCS Engineers (SCS) submits this 30-Day follow-up Notice of Violation (NOV) Numbers A63710 and A63711, which were issued by Bay Area Air District (District) Inspector, Mr. Leif Halvorson via electronic mail. The NOVs were issued to Ms. Jessica Hill, General Manager of the Shoreline Amphitheatre (Shoreline), Mountain View, California (Facility No. 2561) on June 18, 2025, as shown on the copy provided with this letter as an **Attachment A**. A 10-Day Response to the NOVs and Title V Deviation Report was previously submitted to the District on June 27, 2025. This letter satisfies the regulatory requirements for the 30-Day Title V Report required by Title V Permit Condition Section I.F (Monitoring Reports).

NOV Number A63710

On June 18, 2025, during an Air District facility inspection, a component leak was observed at one of the landfill gas extraction wellhead (SHOREW46) located within a vault at the site. NOV Number A63710, issued on June 18, 2025 alleged a violation of District Reg 8, Rule 34, Section 301.2 citing a component leak in excess of 1,000 parts per million (ppm) as methane.

Per Condition Number 876, Part 4 of the Title V Permit, component or surface leaks shall not exceed the limit specified in District Rules 8-34-301.2 or 8-34-303.

Corrective Actions

Corrective actions were initiated by the site's third-party operations and maintenance (O&M) provider, SCS Field Services (SCSFS) at the location identified by the District. These corrective actions were applied to well SHOREW46 which included wellhead and ancillary fitting and piping maintenance, ensuring component fittings are tight and well-sealed, and performing additional wellhead valve adjustments. Additional details of corrective actions and preventative measures can be found in **Attachment B**. Remediation efforts were initiated upon discovery and re-monitoring was completed on June 24, 2025. Results of the

Mr. Jeffery Gove
July 18, 2025
Page 2

re-monitoring showed component was in compliance within the required 7-day timeframe. The re-monitoring results indicated methane emitted from the component at a concentration that was below the 1,000 ppmv limit.

Corrective actions and re-monitoring were completed within the required timeframes and the results indicated the alleged exceedance had been successfully remediated with methane emissions below the 1,000 ppmv limit stated in District Rule 8-34-301.2.

NOV Number A63711

In addition to the component leak discussed above, the Air District inspector observed three (3) wellheads (SHOREW33, SHOREW40 and SHOREW46) that were not under vacuum during the inspection. NOV Number A63711, issued on June 18, 2025 alleged a violation of District Reg 8, Rule 34, Section 305.1 and the California Landfill Methane Regulation (LMR) Section (§) 95464(c) for discovery of 3 wellheads that were not under vacuum.

Additionally as previously stated in the 10-day NOV response, SCS would like to point out that pursuant to §95464(c)(1), the collection wells located on-site are not required to be operated under vacuum as they are installed beneath a final cover system that includes a geomembrane. Therefore, Shoreline would not be in violation of the LMR requirements for gas collection wells. As such, Shoreline would like to request an update to the NOV A63711 which shows the facility was not in violation of the LMR requirement for gas collection wells.

Corrective Actions

Corrective actions were initiated by the site's third-party O&M provider, SCSFS, at the locations identified by the District. These corrective actions included well valve and vacuum adjustments. Upon re-monitoring conducted on June 26, 2025, two of the three wells (SHOREW33 and SHOREW40) were shown to be under negative pressure; one well (SHOREW46) was unable to achieve negative pressure with well valve and vacuum adjustments and it was determined additional actions were necessary for negative vacuum to be applied.

Corrective actions and re-monitoring were completed and the results indicated that two of the three wells were operating within the parameters of District Rule 8-34-305.1. For the third well, additional corrective actions were required and undertaken on July 16, 2025. The installation of supplemental vacuum lines to all three wells, SHOREW33, SHOREW40 and SHOREW46, on July 16, 2025 as additional corrective actions to enhance the available vacuum applied at each well. The wells were remonitored on July 17, 2025 and all three wells were under negative pressure. Results of re-monitoring can be found in **Attachment B**.

Conclusion

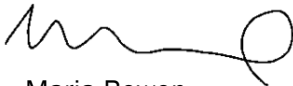
To address the NOV's noted above, SCS will continue routine wellfield and component leak monitoring in accordance with District Requirements, as well as the Major Facility Review

Mr. Jeffery Gove
July 18, 2025
Page 3

(MFR) Permit, and with the LMR regulation which includes integrated monitoring, to the extent possible given site constraints.

We trust that this letter satisfies the Title V Permit Deviation Reporting requirements. Please contact Maria Bowen by telephone at (619) 455-9518 or by email at mbowen@scsengineers.com, if you have any questions or concerns.

Sincerely,



Maria Bowen
Project Manager
SCS Engineers



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

cc: Jessica Hill, LiveNation
Leif Halvorson, District

Attachments: NOV Numbers A63710 and A63711

Remonitoring Records

Attachments

NOV Numbers A63710 and A63711



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. **A63710**

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 NAME: Landfill with gas collection system
 EMISSION PT: P# _____ NAME: _____
 DATE: 6/18/2025 TIME: 1117 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 type="checkbox"/> REG 2 RULE ___ 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 checked="" type="checkbox"/> REG <u>8</u> RULE <u>34</u> SECTION <u>301.2</u> CODE <input type="text"/>	
<input type="checkbox"/> REG _____ RULE _____ SECTION _____ CODE <input type="text"/>	

Details: Component leak >1000ppm.

RECIPIENT NAME: Jessica Hill
 TITLE: General Manager

SIGNING THIS NOTICE IS NOT
AN ADMISSION OF GUILT

x

➔ **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: Leif Halvorson (via email) INSP # 894
 DATE: 6/18/2025 TIME: 15:00 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. **A63711**

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 NAME: Landfill with gas collection system
 EMISSION PT: P# _____ NAME: _____
 DATE: 6/18/2025 TIME: 1103 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 type="checkbox"/> REG 2 RULE ___ 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 checked="" type="checkbox"/> REG <u>8</u> RULE <u>34</u> SECTION <u>305.1</u> CODE <input type="text"/>	
<input checked="" type="checkbox"/> REG <u>CCR</u> RULE <u>Title 17</u> SECTION <u>95464(c)</u> CODE <input type="text"/>	

Details: Three wellheads not under vacuum

RECIPIENT NAME: Jessica Hill
 TITLE: General Manager

SIGNING THIS NOTICE IS NOT
AN ADMISSION OF GUILT

x

➔ **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: Leif Halvorson (via email) INSP # 894
 DATE: 6/18/2025 TIME: 15:00 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.

Remonitoring Records

**District Inspection SCSFS Field Notes
Shoreline Amphitheater**

Exceedance Type	Location ID	District Inspection Results (ppmv, CH4)	Corrective Action Date	Corrective Action Results	Corrective Action	Comments
		18-Jun	Date	Units	Description	
Component	SHOREW46	1,000 parts per million by volume (ppmv)	6/24/2025	121 ppmv	Wellhead and ancillary fitting and piping maintenance, ensuring component fittings are tight and well-sealed, and performing additional wellhead valve adjustments.	
Positive pressure at Wellhead	SHOREW33	Not Provided by District	6/26/2025	-0.01 inches in water column	Well valve and vacuum adjustments	Additionally, a new lateral was installed at the well on 7/16/2025.
Positive pressure at Wellhead	SHOREW40	Not Provided by District	6/26/2025	-0.02 inches in water column	Well valve and vacuum adjustments	Additionally, a new lateral was installed at the well on 7/16/2025.
Positive pressure at Wellhead	SHOREW46	Not Provided by District	7/17/2025	-0.03 inches in water column	Well valve and vacuum adjustments. A new lateral was installed at the well on 7/16/2025.	

Notes:

The Bay Area Air District did not provide monitoring data associated with the June 18, 2025 inspection or subsequent follow-up monitoring events. All notes in this table are based on SCSFS Field Services field notes from the inspection and subsequent corrective action and re-monitoring results.

NSPS/NESHAP/District Rule 8-34 Semi-Annual
Report
June 1, 2025 through November 30, 2025
Shoreline Amphitheatre
Mountain View, California (Facility No. A2561)

Prepared for:

Shoreline Amphitheatre
1 Amphitheatre Parkway
Mountain View, CA 94043

For Submittal to:

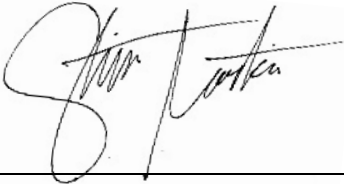
Bay Area Air District
375 Beale Street, Suite 600
San Francisco, CA 94105

SCS ENGINEERS

01202092.00, Task 8 | December 31, 2025

3900 Kilroy Airport Way, Suite 300
Long Beach, CA 90806
562-426-9544

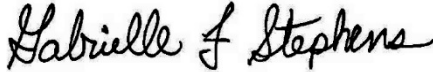
This New Source Performance Standards (NSPS)/National Emission Standard for Hazardous Air Pollutants (NESHAP)/Bay Area Air District (District) Rule 8-34 Semi-Annual Report for the Shoreline Amphitheatre in Mountain View, California, dated December 2025, was prepared and reviewed by the following:



Stipe Markotic
Staff Professional
SCS ENGINEERS



Maria Bowen
Project Manager
SCS ENGINEERS



Gabrielle Stephens
Vice President
SCS ENGINEERS

Table of Contents

Section	Page
1.0 Introduction	1
2.0 Site Background Information.....	3
2.1 Existing Landfill Gas Control System.....	3
3.0 Monitoring and Records	4
3.1 Continuously Monitored Parameters	4
3.1.1 Gas Extraction System Downtime	4
3.1.2 Emission Control System Downtime	4
3.1.3 Individual Well Downtime	4
3.1.4 Minimum Flare Temperature.....	4
3.2 Component Leak Quarterly Monitoring.....	4
3.2.1 Third Quarter 2025 Monitoring.....	5
3.2.2 Fourth Quarter 2025 Monitoring.....	5
3.3 Control Efficiency.....	5
3.4 Landfill Surface Monitoring.....	5
3.5 Gas Collection System Installations and Upgrades.....	6
3.6 Well Field Monthly Monitoring.....	6
3.6.1 Pressure.....	6
3.6.2 Oxygen.....	7
3.6.3 Temperature.....	7
3.6.4 Monthly Methane and Flow Readings (Test Port)	7
3.7 Cover Integrity Monitoring.....	7
3.8 Gas Generation Estimate.....	7
3.9 Annual Waste Acceptance Rate and Refuse in Place.....	8
3.9.1 Non-Degradable Waste Areas	8

Tables

Table 1 – Wells with Positive Pressure Readings

Table 2 – Monthly CH₄ and Flow Readings (Test Port)

Appendices

Appendix A – Drawing of LFG Collection and Control System

Appendix B – Quarterly Component Leak Monitoring Results

Appendix C – Well Monitoring Data

Appendix D – Projected LFG and NMOC Generation Rate – Mountain View (Vista)

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 District (District) Rule 8-34 Semi-Annual Report to the District. 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, 2025 through November 30, 2025.

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 District 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 District 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 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)

1.1.1 National Emission Standards for Hazardous Air Pollutants Notes and Objections to Semiannual Report Submittal

Shoreline submits this semi-annual report covering the reporting period from January 1, 2025 to November 30, 2025 (the “Report”) in accordance with the provisions of 40 CFR Part 63, Subpart AAAA, the Landfill NESHAP. The Report consists of the CEDRI electronic file report, using Version 3.0, last updated as of March 19, 2025, and the accompanying pdf narrative report form attached thereto. Shoreline’s submittal of the Report, and its Certification thereof, is made subject to the notes and objections set forth herein.

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

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

- There is an error in the “Number of Exceedances” tab of the CEDRI electronic file report: in this tab, the spreadsheet does not correctly calculate the number of exceedances due to an error in the formula embedded in the spreadsheet, with the effect of displaying the same exceedances numerous times.
- There is no place to add the surface emission monitoring concentration values as required by the rulemaking. This precludes the inclusion of all relevant information within the electronic file report.
- The CEDRI electronic file purports to incorporate several elements of the general provisions of 40 CFR Subpart 63, Subpart A, which are not applicable. For example, the electronic file refers to “CMS” in several locations. Shoreline has included information about enclosed flare temperature monitoring in these sections, where appropriate, and as relevant to the operating requirements set forth at 40 CFR §63.1983(c). However, the type of temperature monitoring equipment used at municipal solid waste landfills (thermocouples) are not typically required to meet the full set of requirements for more traditional continuous monitoring systems as set forth in Subpart A, such as equipment manufacturer, model number and calibration or certification information. Further, such information is not required to be maintained under the Landfill NESHAP and therefore is neither feasible nor required to be included within the Report. See, Table 1 to the Landfill NESHAP, which indicates that “Additional recordkeeping for sources with CMS” requirements under 40 CFR §63.10(c) are not applicable to this sector. Accordingly, in completing the Report, Shoreline has completed only those fields in the CEDRI electronic file where applicable and/or otherwise appropriate.
- While the CEDRI electronic file format contains operating information required to be submitted under the Landfill NESHAP as set forth at 40 CFR. §63.1981(h), it is Shoreline’s

understanding that the certification and deviation requirements, as set forth in the “Certification” and “Deviation” tabs of the CEDRI spreadsheet, are applicable only to CMS systems at the affected facility, and do not apply to the other operational and compliance information required pursuant to the Landfill NESHAP.

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

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

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 District, 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 Carbon Adsorption System (CAS). As required by the September 2019 Compliance and Enforcement Agreement, SCS submitted a proposed plan for implementing the project on November 27, 2019. District 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 District 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 District 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 District 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 control device related 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 shut down per the Compliance and Enforcement Agreement, dated September 2019, and the ATC that was issued by the District 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 standards 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 District 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 Second Quarter 2025 Monitoring

As noted in the 1st 2025 Semi-Annual Report, the results of the Second Quarter 2025 component leak monitoring would be included in this report as the results were not available prior to the reporting submittal deadline in June 2025.

The Second Quarter 2025 component leak monitoring, required by District Rule 8-34-503, was conducted on June 17, 2025. Testing was performed by SCSFS using an Organic Vapor Analyzer (OVA), which was calibrated on the day testing occurred. Results of the monitoring event are provided in **Appendix B**.

During the initial monitoring, there were no locations where concentration of methane gas were over 500 parts per million by volume (ppmv). No further monitoring was required.

3.2.2 Third Quarter 2025 Monitoring

The Third Quarter 2025 component leak monitoring, required by District Rule 8-34-503, was conducted on August 21, 2025. Testing was performed by SCSFS using an OVA, which was calibrated on the day the testing occurred. Results of the monitoring event are provided in **Appendix B**.

During the initial monitoring, there were four (4) locations where concentrations of methane gas were over 500 ppmv at wells EW-29, EW-33, EW-40 and EW-46. Corrective actions which included placing grout inside the vault to seal the leak were initiated and all areas were re-monitored on August 28, 2025, and showed no further exceedances. A follow up 30 monitoring event was conducted on September 26, 2025, and showed all areas remained in compliance, included in **Appendix B**. No further actions were needed.

3.2.3 Fourth Quarter 2025 Monitoring

The Fourth Quarter 2025 component leak monitoring, required by District Rule 8-34-503, was conducted on November 20, 2025. Testing was performed by SCSFS using an OVA, which was calibrated on the day the testing occurred. Results of the monitoring event are provided in **Appendix B**.

During the initial monitoring, there were no locations where concentrations of methane gas was over 500 ppmv. The highest concentration during the monitoring event was 180 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 District Rule 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 at least 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 2025 and was provided in Appendix C of the Semi-Annual NSPS/NESHAP report dated June 2025. The next Annual SEM event is scheduled for 2026.

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 District rule 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 nine (9) remaining 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.

On June 18, 2025, during an onsite District inspection, there were three (3) instances of positive pressure at wells EW-33, EW-40, and EW-46. Adjustments to the City of Mountain View's header valve were made on June 26, 2025 in an attempt to bring the wells back into compliance. On June 26, 2025, during the routine monthly well monitoring, there were three (3) instances of positive pressure at wells EW-33, EW-40, and EW-46. Corrective actions were initiated the same day and EW-33 and EW-40 returned to compliance. Further corrective actions are needed for well EW-46. The results of the monthly monitoring positive pressure readings along with the associated corrective actions are found in **Table 1**. Per 63.1960(3)(i)(a), a root cause analysis is required for the positive pressure exceedance at well EW-46 as it could not be brought back into compliance within 15 days of the initial exceedance. A copy of the root cause analysis is found in **Appendix C**.

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 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. Wellfield monitoring and tuning efforts adhere to the requirements in the permit.

During the reporting period, there were no exceedances of the oxygen limit based on the alternative wellhead limits required under Rule 8-34-305 and 8-34-414.

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 District 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 District Rule 8-34-510, NSPS, and NESHAP schedule requirement of monthly and quarterly monitoring. Monthly cover integrity monitoring for purposes of District Rule 8-34 was conducted on June 26, July 17, August 14, September 16, October 16, and November 20, 2025. 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. Wells with Positive Pressure
Shoreline Amphitheatre
June 1, 2025 through November 30, 2025**

Well ID	Date	Static Press ["H2O]	Corrective Action Date	Corrective Action	15-Day Follow- Up Date	15-Day Follow-Up Static Press ["H2O]	Comments
EW-33	6/18/2025	N/A	6/26/2025	Valve Adjustment	6/26/2025	-0.01	Initial positive pressure noted during District inspection. Initial readings were not provided by District.
EW-40	6/18/2025	N/A	6/26/2025	Valve Adjustment	6/26/2025	-0.02	Initial positive pressure noted during District inspection. Initial readings were not provided by District.
EW-46	6/18/2025	N/A	6/26/2025	Valve Adjustment	6/26/2025	0.00	Initial positive pressure noted during District inspection. Initial readings were not provided by District. Well was brought back into compliance (-0.03 inches of water) on 7/17/25 within 60 days.

**Table 2. Monthly Methane and Flow Readings
Shoreline Amphitheatre, Mountain View, CA
June 1, 2025 through November 30, 2025**

Month	Methane Content (%)	Average LFG Flow (scfm)	Average LFG Flow at 50% Methane (scfm)
Jun-25	50.4	7.3	7.4
Jul-25	26.8	4.3	2.3
Aug-25	6.4	3.8	0.5
Sep-25	61.6	3.0	3.6
Oct-25	63.8	3.0*	3.8
Nov-25	11.1	3.0*	0.7
Average During Reporting Period	36.7	4.6	3.1

*Flow readings were unavailable. The average flow from September 2025 was used as an estimate of the flow rate during months when readings were unavailable.

Appendix A
Drawing of LFG Collection and Control System

Appendix B
Quarterly Component Leak Monitoring Results

Component Emissions Monitoring Results

Shoreline Amphitheatre, Mountain View, California

Field Technician and Weather Conditions					
Technician	Date	Ambient Temp	Barometric Pressure (in - Hg)	General Weather	Wind Speed/Direction
Don Gibson	08/21/2025	65	29.0	Sunny	2 mph / NW
Don Gibson	08/28/2025	71	30.0	Sunny	5 mph / NW
Location	Date	Well Vault (ppm)		Re-Testing 8/28/25	Comments
EW-10	8/21/2025				
EW-11	8/21/2025				
EW-18	8/21/2025				
EW-19	8/21/2025				
EW-29	8/21/2025	10,000		2.7	Grout placed inside vault to seal
EW-33	8/21/2025	20,000		1.2	Grout placed inside vault to seal
EW-37	8/21/2025	47.4			
EW-40	8/21/2025	931		1.7	Grout placed inside vault to seal
EW-46	8/21/2025	16,000		6.8	Grout placed inside vault to seal



Component Emissions Monitoring Results

Shoreline Amphitheatre, Mountain View, California

Field Technician and Weather Conditions					
Technician	Date	Ambient Temp	Barometric Pressure (in - Hg)	General Weather	Wind Speed/Direction
Don Gibson	09/26/2025	62	29.9	cloudy	2 mph / NW
Location	Date	Well Vault (ppm)		Re-Testing	Comments
EW-10	9/26/2025	1.4			
EW-11	9/26/2025	1.1			
EW-18	9/26/2025	10.1			
EW-19	9/26/2025	3.9			
EW-29					
EW-33					
EW-37	9/26/2025	1.0			
EW-40					
EW-46					



Component Emissions Monitoring Results

Shoreline Amphitheatre, Mountain View, California

Field Technician and Weather Conditions					
Technician	Date	Ambient Temp	Barometric Pressure (in - Hg)	General Weather	Wind Speed/Direction
Don Gibson	11/20/2025	52	30.0	cloudy	west /2 mph
Location	Date	Well Vault (ppm)		Re-Testing	Comments
EW-10	11/20/2025	0.4			
EW-11	11/20/2025	0.7			
EW-18	11/20/2025	3.6			
EW-19	11/20/2025	1.8			
EW-29	11/20/2025	53			
EW-33	11/20/2025	180			
EW-37	11/20/2025	3.9			
EW-40	11/20/2025	175			
EW-46	11/20/2025	26			



Appendix C
Well Monitoring Data

Shoreline Amphitheatre - Well Data - 06/01/2025 to 11/30/2025

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	6/26/2025 15:12	63.1	32.4	0.5	4.0	88.2	89.0	-0.99	-0.99	9	9	-0.01	
EW-10	7/17/2025 10:49	33.3	23.3	4.9	38.5	78.0	78.0	-0.81	-0.81	0	0	0.00	
EW-10	7/30/2025 10:05	60.2	31.8	0.5	7.5	73.3	76.3	-0.41	-0.41	4	0	0.01	
EW-10	8/14/2025 12:18	32.8	24.3	3.2	39.7	89.0	89.5	-0.47	-0.47	0	0	0.00	
EW-10	9/16/2025 13:11	60.7	33.5	0.6	5.2	97.0	95.8	-28.21	-28.21	8	6	-0.05	
EW-10	10/16/2025 15:47	53.9	29.1	3.4	13.6	86.9	90.1	-1.04	-0.99	0	0	0.00	Valve Adjustment:No Change
EW-10	11/20/2025 11:59	52.4	36.9	0.4	10.3	57.0	58.3	-0.03	-0.04	0	0	0.00	
EW-11	6/26/2025 15:25	60.1	32.0	2.7	5.2	95.5	94.4	-0.02	-0.01	1	0	0.00	
EW-11	7/17/2025 11:06	27.9	25.0	0.2	46.9	80.6	81.0	-0.75	-0.78	0	0	0.00	
EW-11	7/30/2025 10:09	54.5	31.1	2.2	12.2	71.9	73.0	-0.44	-0.43	1	3	-0.10	
EW-11	8/14/2025 12:41	49.9	29.6	0.2	20.3	92.0	92.1	-0.45	-0.45	0	0	0.00	
EW-11	9/16/2025 13:17	59.9	33.4	1.4	5.3	100.3	100.4	-0.09	-0.09	0	0	-0.05	
EW-11	10/16/2025 15:51	54.2	27.8	3.8	14.2	82.9	82.4	-0.02	-0.01	6	3	0.00	Valve Adjustment:No Change
EW-11	11/20/2025 12:01	58.0	39.5	1.3	1.2	57.4	57.1	-0.01	-0.01	0	0	0.00	Valve Adjustment:No Change
EW-18	6/26/2025 15:34	62.9	33.9	0.2	3.0	79.7	79.6	-1.11	-1.05	10	7	0.00	
EW-18	7/17/2025 11:08	28.9	26.1	0.1	44.9	78.2	78.0	-0.83	-0.83	1	1	0.13	
EW-18	7/30/2025 10:19	5.5	20.2	0.1	74.2	74.0	73.3	-0.45	-0.44	2	1	0.00	
EW-18	8/14/2025 12:43	5.9	19.2	0.2	74.7	101.0	100.4	-0.46	-0.46	0	0	0.00	
EW-18	9/16/2025 13:23	40.2	30.0	0.2	29.6	95.8	95.7	-22.18	-22.17	0	0	0.02	
EW-18	10/16/2025 15:58	60.6	36.6	0.1	2.7	78.0	79.3	-0.83	-0.85	0	0	0.00	
EW-18	11/20/2025 12:04	60.8	29.6	1.0	8.6	57.6	57.6	-1.85	-1.95	0	0	0.00	
EW-19	6/26/2025 15:36	63.2	32.7	0.1	4.0	80.4	80.5	-0.13	-0.13	2	2	0.00	
EW-19	7/17/2025 11:10	53.2	31.3	0.0	15.5	76.2	76.2	-0.12	-0.12	0	0	0.08	
EW-19	7/30/2025 10:21	48.6	30.7	0.1	20.6	83.7	83.7	-0.09	-0.09	3	3	-0.20	
EW-19	8/14/2025 12:46	55.8	31.6	0.0	12.6	98.4	98.9	-0.03	-0.11	0	0	0.00	Valve Adjustment:Opened Valve 1/2 turn or less
EW-19	8/14/2025 12:48	56.4	31.5	0.0	12.1	98.9	98.5	-0.13	-0.12	0	0	0.04	Valve Adjustment:No Change
EW-19	9/16/2025 13:26	50.2	29.5	1.3	19.0	102.7	104.1	-3.05	-3.04	0	0	0.00	
EW-19	10/16/2025 15:59	62.4	32.9	0.0	4.7	79.2	79.1	-1.20	-1.26	0	0	0.00	Valve Adjustment:No Change
EW-19	11/20/2025 12:06	60.6	30.0	1.3	8.1	57.9	57.8	-2.11	-2.11	5	7	0.00	Valve Adjustment:No Change
EW-29	6/26/2025 15:42	59.1	33.8	1.0	6.1	93.7	93.8	-1.00	-1.01	9	8	0.00	Valve Adjustment:No Change
EW-29	7/17/2025 11:20	39.2	30.5	3.9	26.4	85.8	85.4	-0.80	-0.80	0	0	0.01	
EW-29	8/14/2025 12:55	57.7	35.3	0.1	6.9	98.8	101.1	-0.02	-0.31	0	0	0.01	Valve Adjustment:Opened Valve 1/2 turn or less
EW-29	8/14/2025 12:57	57.9	36.2	0.1	5.8	102.0	101.9	-0.41	-0.42	0	3	0.02	Valve Adjustment:No Change
EW-29	9/16/2025 13:31	48.8	36.9	0.1	14.2	99.0	98.8	-28.88	-28.88	5	4	0.04	
EW-29	10/16/2025 16:07	49.0	31.5	3.2	16.3	88.2	90.8	-0.73	-0.73	0	0	0.00	Valve Adjustment:No Change
EW-29	11/20/2025 12:13	60.3	35.2	0.2	4.3	62.1	61.4	-0.36	-0.37	0	0	0.01	Valve Adjustment:No Change
EW-33	6/26/2025 15:45	57.6	38.5	0.4	3.5	71.3	70.3	0.00	0.00			-0.01	Valve Adjustment:No Change
EW-33	6/26/2025 15:48	58.3	40.8	0.0	0.9	70.8	70.3	0.00	-0.01			-0.01	Valve Adjustment:No Change
EW-33	7/17/2025 11:29	58.4	41.6	0.0	0.0	68.8	68.5	-0.07	-0.08			-0.22	
EW-33	8/14/2025 13:02	59.4	38.6	0.0	2.0	75.3	74.7	-0.06	-0.05			0.01	
EW-33	9/16/2025 13:35	58.3	39.5	0.0	2.2	79.4	78.8	-0.49	-0.49			0.00	
EW-33	10/16/2025 16:11	60.0	39.8	0.1	0.1	67.5	67.4	-0.03	-0.02			0.00	
EW-33	11/20/2025 12:16	59.4	39.3	0.0	1.3	58.7	58.2	-0.06	-0.06			0.00	

Shoreline Amphitheatre - Well Data - 06/01/2025 to 11/30/2025

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	6/26/2025 15:50	58.6	37.4	0.1	3.9	70.7	70.8	-0.08	-0.07			0.00	
EW-37	7/17/2025 11:33	59.4	40.6	0.0	0.0	68.1	68.0	-0.03	-0.02			0.09	
EW-37	8/14/2025 13:06	59.8	38.9	0.0	1.3	72.0	72.8	-0.03	-0.06			0.00	Valve Adjustment:No Change
EW-37	9/16/2025 13:38	59.1	40.6	0.0	0.3	77.9	78.4	-0.14	-0.15			0.03	
EW-37	10/16/2025 16:14	60.1	39.6	0.0	0.3	66.8	66.6	-0.01	-0.01			0.00	
EW-37	11/20/2025 12:20	61.4	38.4	0.0	0.2	56.8	56.6	-0.03	-0.03			0.01	
EW-40	6/26/2025 15:52	59.8	35.4	0.5	4.3	70.9	71.5	0.00	0.00			0.00	Valve Adjustment:No Change
EW-40	6/26/2025 15:53	61.2	37.2	0.0	1.6	71.7	70.8	-0.02	-0.01			0.00	
EW-40	7/17/2025 11:37	59.4	40.6	0.0	0.0	69.3	69.3	-0.03	-0.04			-0.17	
EW-40	8/14/2025 13:09	58.9	34.8	0.2	6.1	73.4	73.7	-0.02	-0.02			0.00	
EW-40	9/16/2025 13:41	58.7	39.9	0.0	1.4	78.2	78.8	-0.19	-0.19			0.04	
EW-40	10/16/2025 16:16	59.4	38.4	0.5	1.7	67.2	67.0	-0.01	-0.01			0.00	Valve Adjustment:No Change
EW-40	11/20/2025 12:23	61.2	38.2	0.0	0.6	57.2	56.9	-0.01	-0.01			0.06	
EW-46	6/26/2025 15:56	61.2	35.3	0.1	3.4	73.6	73.3	0.00	0.00			-0.02	Valve Adjustment:No Change
EW-46	6/26/2025 15:59	65.1	34.9	0.0	0.0	72.6	73.3	0.00	0.00			-0.01	Valve Adjustment:No Change
EW-46	7/17/2025 11:41	63.1	36.9	0.0	0.0	95.0	95.1	-0.03	-0.02			0.00	
EW-46	8/14/2025 13:16	68.3	25.9	4.5	1.3	74.8	75.8	-0.01	-0.01			0.00	
EW-46	9/16/2025 13:43	63.5	36.5	0.0	0.0	78.7	78.6	-0.13	-0.14			0.00	
EW-46	10/16/2025 16:21	64.4	30.5	0.2	4.9	63.4	63.3	-0.01	-0.01			0.00	
EW-46	11/20/2025 12:25	64.4	35.6	0.0	0.0	56.8	56.6	-0.01	-0.01			0.03	

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 ³ /yr)	LFG Generation Rates (cfm) (Million ft ³ /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 ft³/ton
 METRIC EQUIVALENT: 169.9 cu m/Mg