

SHORELINE AMPHITHEATRE

TITLE V SEMI-ANNUAL MONITORING REPORT

SITE: SHORELINE AMPHITHEATRE	FACILITY ID#: A2561
REPORTING PERIOD: from 12/01/2020 through 5/31/2021	

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

The Bay Area Air Quality Management District (BAAQMD or District) issued Notices of Violation (NOVs) Nos. A53663 and A53664 on December 10, 2014.

- NOV No. A53663 references Rule 2-6-307 for not venting landfill gas (LFG) to a flare.
- NOV No. A53664 references the Title 17 California Code of Regulations (CCR) (Landfill Methane Rule [LMR]) Sections 95464(b)(3)(A)(1) and 95464(b)(4) for no LFG control and no source test, respectively

On behalf of Live Nation, SCS Engineers (SCS) submitted a 10-day NOV response letter to the BAAQMD on December 19, 2014.

The BAAQMD also issued NOV No. A56519 on March 1, 2018.

- NOV No. A56519 references the Title 17 CCR Section 95470(b)(3) for an incomplete annual LMR report for 2016.

SCS submitted a 10-day NOV response letter for this violation on March 9, 2018 and a revised 2016 LMR annual report was delivered to the BAAQMD office via FedEx on March 15, 2018.

Per the Notice to Comply (NTC) issued by the BAAQMD on September 6, 2018, Shoreline was required to submit an addendum to the June 2019 Title V Semi-Annual Monitoring Report referencing the three above-mentioned NOVs. Live Nation is working to resolve these issues with the BAAQMD and the City of Mountain View since Shoreline is unable to maintain combustion of the A-2 flare due to low gas quality. 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 are scheduled to occur summer through fall of 2021

These NOVs were not issued during the reporting period; however, these violations will continue to be noted in the Title V reports until the project is complete and compliance is achieved by destroying the LFG in the City of Mountain View's flares.

Please note that NOV No. A53664 and No. A56519 both reference sections of the LMR, and these citations are not federally enforceable, and not required by Rule 8-34 or the NSPS, but have been referenced herein, per directive from the BAAQMD inspector. Additionally, the LMR sections referenced in NOV Nos. A53664 and A56519 are not included in Shoreline's current Major Facility Review (MFR, Title V) permit.

NOV No. A53663 references BAAQMD Regulation 2-6-307 and Condition No. 876, Part 4, which requires LFG to be vented to the flare. Please note that Part 4 also allows the use of the A-1 carbon adsorption system (CAS). The CAS has been acting as the main control device due to insufficient landfill gas (LFG) generation to sustain flare operation.

Once construction of the GCCS is completed, the modified GCCS will result in Shoreline's LFG being combusted in the City's flares, bringing Shoreline Amphitheatre into full compliance with the LMR.

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Site: Shoreline Amphitheatre	Facility ID#: A2561
Permitted Unit: S-1 – Landfill Gas Collection System	Reporting Period: from 12/01/2020 through 5/31/2021

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)	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	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	Periodic / Daily	BAAQMD 8-34-113.2	≤240 hours/year and 5 consecutive days	Continuous	N/A

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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	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 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	BAAQMD Condition # 876, Parts 3d-e and	Monthly Inspection and Records	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

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Permitted Unit: S-1 – Landfill Gas Collection System	Reporting Period: from 12/01/2020 through 5/31/2021

Type of Limit or Criteria	Monitoring Requirement Citation	Parameters Monitored	Monitoring Frequency	Citation of Limit	Limit	Compliance Summary	Corrective Actions Taken
Operating Requirements	18i			3a(i & iii)	connect wells and collectors to vacuum when wellhead CH ₄ > 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 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	Continuous	N/A

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Permitted Unit: S-1 – Landfill Gas Collection System	Reporting Period: from 12/01/2020 through 5/31/2021

Type of Limit or Criteria	Monitoring Requirement Citation	Parameters Monitored	Monitoring Frequency	Citation of Limit	Limit	Compliance Summary	Corrective Actions Taken
					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 ³ (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

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Site: Shoreline Amphitheatre	Facility ID#: A2561
Permitted Unit: A-2 – Landfill Gas Flare	Reporting Period: from 12/01/2020 through 5/31/2021

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	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	Flare A-2 did not operate during the reporting period.
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)	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	Flare A-2 did not operate during the reporting period.
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)	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	Flare A-2 did not operate during the reporting period.
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	Flare A-2 did not operate during the reporting period.
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	Flare A-2 did not operate during the reporting period.

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Site: Shoreline Amphitheatre	Facility ID#: A2561
Permitted Unit: A-2 – Landfill Gas Flare	Reporting Period: from 12/01/2020 through 5/31/2021

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	Flare A-2 did not operate during the reporting period.
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	Periodic/ Annual	BAAQMD Regulation 9-1-302	≤ 300 ppm (dry basis) (applies to A-2 Landfill Gas Flare only)	Continuous	Flare A-2 did not operate during the reporting period.
Total Sulfur Content in Landfill Gas	BAAQMD Condition # 876, Parts 17 and 18h-i	Annual TRS Analysis of Landfill Gas and Records	Periodic/ Annual	BAAQMD Condition # 876, Part 15	≤1300 ppmv, express as H ₂ S	Continuous	Flare A-2 did not operate during the reporting period.
Heat Input	BAAQMD Condition # 876, Parts 11, 18c, 18e, and 18f	Gas Flow Meter and Records	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	Flare A-2 did not operate during the reporting period.
NO _x	BAAQMD Condition # 876, Parts 16d and 18i	Source Tests and Records	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	Flare A-2 did not operate during the reporting period.
CO	BAAQMD Condition # 876, Parts 16d and 18i	Source Tests and Records	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	Flare A-2 did not operate during the reporting period.

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Site: Shoreline Amphitheatre	Facility ID#: A2561
Permitted Unit: A-1 – Carbon Adsorption System	Reporting Period: from 12/01/2020 through 5/31/2021

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	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	
NMOC	BAAQMD Condition # 876, Parts 14 and 18g	Periodic Monitoring of A-1 Exhaust with a Portable Analyzer and Records	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	BAAQMD inspector approved weekly sampling of carbon adsorption system due to consistently low NMOC concentrations.

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TITLE V SEMI-ANNUAL MONITORING REPORT

Site: Shoreline Amphitheatre	Facility ID#: A2561
Permitted Unit: S-3 – Diesel Engine	Reporting Period: from 12/01/2020 through 5/31/2021

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	BAAMQD 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

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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

6/21/21

Date

Brian Rutkowski

Name of Responsible Official

General Manager, Shoreline Amphitheatre

Title of Responsible Official

Mail to:

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