

September 3, 2026

Board of Directors
Ventura Regional Sanitation District
Ventura, California

RATIFY EMISSION TESTING SERVICES PERFORMED BY AND PAYMENTS MADE TO AIRX TESTING SERVICES FOR OXNARD AND TOLAND ROAD LANDFILL FLARES AND SECURED VIA A SOLE SOURCE PROCESS

RECOMMENDATION

Ratify emission testing services performed at both the Oxnard and Toland Road Landfill flares to be performed by AirX Testing Services and payments made to AirX for such services.

FISCAL IMPACT

The funding for these services are included in the adopted FY2026 and FY2027 District budgets under the Environmental account (52079) within the Toland, Bailard and Coastal Funds.

BACKGROUND/ANALYSIS.

HISTORY

Prior to 2022, the District contracted with Horizon Testing, based in Camarillo, California, to perform landfill flare source testing at the Oxnard and Toland Road Landfill flares. Horizon was the District's preferred contractor and was widely recognized for its expertise in landfill flare source testing. Around 2022, Horizon Testing was acquired by Alliance Source Testing, and the District used Alliance under the assumption that the same level of service and expertise from Horizon would be maintained.

Unfortunately, Alliance Source Testing's performance did not meet expectations. During the June 2022 source test of the Oxnard Landfill flare, the company submitted its report late, which resulted in concerns raised by the Ventura County Air Pollution Control District (VCAPCD). Upon review, VCAPCD determined that the testing had not been performed correctly. Although VCAPCD could have issued a Notice of Violation (NOV) for a noncompliant source test and report, the VCAPCD instead allowed the District to conduct a retest. Following several delays, the retest was completed in January 2023. However,

Alliance Source Testing, again, failed to submit the report on time, prompting VCAPCD to threaten enforcement action upon the District.

In 2024, while preparing to conduct the initial source test on the newly installed Toland Road Landfill flare, staff sought an alternative testing contractor and were referred to Energy Environmental Solutions, Inc. (EES). Because of the District's prior experience with Alliance Source Testing, staff elected to evaluate EES. However, EES also failed to meet expectations. During preliminary testing, their personnel arrived late and departed early to return to the Los Angeles area. Additionally, they asked several basic operational questions that indicated a limited understanding of landfill flare systems. Based on these observed concerns, staff chose not to proceed with EES and instead retained AirX Testing Services, Inc. (AirX), based out of Ventura, California, on a sole source basis because competitive bidding would be impractical due to limited vendor availability and the District's prior experience with the alternative vendors, to perform the initial landfill flare source test. Since that time, AirX has successfully completed the District's flare source testing services without any performance or compliance issues.

CURRENT FACTS & CIRCUMSTANCES

On June 25 & July 9, 2025, AirX performed the required methane destruction efficiency test for the Toland Road Landfill flare. The test was completed successfully, and the flare passed all applicable testing requirements without issue at a cost of \$7,746.

On May 7 & 12, 2026, AirX performed the required methane destruction, efficiency and sulfur content source test for the Oxnard Landfills flare. The amount for this round of testing was \$21,300. The testing was completed successfully, and the flare passed all applicable testing requirements without issue.

On June 24 and July 2, 2026, AirX performed the required biennial compliance source test for the Toland Road Landfill flare. The cost for this biennial test is \$20,607. The testing was completed successfully, and preliminary results indicate that the flare passed all applicable testing requirements. Together, all services performed by AirX equal \$49,653.

During the invoice review process, staff discovered that AirX was not operating under an existing, legally binding service agreement with the District. Because the total amount paid to AirX during the 2025-26 FY exceeded the General Manager's \$25,000 purchasing authority as set forth in the VRSD Resolution No. 89-13, Part II, Section 200 and/or Part IV, Section 400.

PROPOSAL

Board approval is required to authorize payment of \$20,607 for the June 24 & July 2, 2026, bi-annual source test. In addition, staff is seeking Board approval for the methane destruction testing performed at the Toland and Oxnard Landfills Flares (\$29,046) which exceeded the cumulative \$25,000 General Manager threshold.

To prevent similar situations in the future, the Director of Operations has directed staff at both the Toland Road Landfill, Water and Wastewater Divisions to compile a list of recurring services and their required service intervals. This information will be used to

establish service agreements for recurring services, ensuring compliance with the District's purchasing policy at Section 304, improving contract administration, and providing greater consistency in the procurement process.

In addition, based on the information gathered, the unsatisfactory services previously received from Alliance Source Testing, and the lack of confidence in Energy Environmental Solutions, Inc., staff has initiated discussions with AirX to develop a comprehensive scope of services for performing all required flare testing at both the Oxnard Landfill and Toland Road Landfill flares. Once the scope of services is finalized, staff will return to the Board to request approval of a sole-source agreement with AirX for landfill flare testing. The next required testing cycle for both the Oxnard and Toland Road Landfill flares is scheduled for 2028.

This letter has been reviewed by Legal Counsel as to form.

If you should have any questions or need additional information, please contact me by phone at (805) 432-0474 or via email at jamestorrez@vrsd.com.

JAMES TORREZ, DIRECTOR OF OPERATIONS

APPROVED FOR FISCAL IMPACT:



Alvertina Rivera, Director of Finance/Administrative Services

APPROVED FOR AGENDA:



Eric Zetz, General Manager