



CHIQUITA CANYON

A Waste Connections Company

July 21, 2023

Via E-mail

Mark Pestrella
Director
Los Angeles County Public Works
900 S. Fremont Ave.
Alhambra, CA 91803
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**Re: Chiquita Canyon Landfill – New Landfill Gas Flare to Address
Community Odor Complaints**

Director Pestrella,

Chiquita Canyon, LLC (“Chiquita”) urgently needs to install an additional landfill gas (“LFG”) combustion flare at the Chiquita Canyon Landfill (the “Landfill”). Over the last few months, Chiquita’s neighbors within the communities surrounding the Landfill have been lodging increased and ongoing complaints of odors. If the Landfill is the source of these alleged odors, then Chiquita believes that they are most likely due to a large and unexpected increase in the production of LFG at the Landfill.

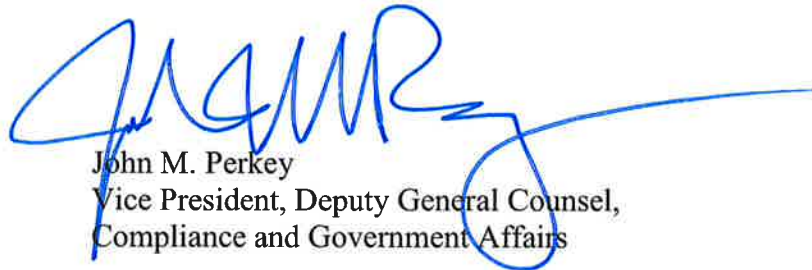
After preliminary investigation and evaluation, Chiquita believes this increase in LFG production is due to an abnormal biotic or abiotic process within a portion of the Landfill waste mass (also known as a landfill “reaction” called Hydrothermal Carbonization). Note that this reaction is not the result of a fire or other combustion within the Landfill waste mass and, in fact, results in an increase in the generation of process water (leachate), gas and heat.

Chiquita’s current LFG processing system, in conjunction with the landfill-gas-to-energy facility operated by Ameresco Chiquita Energy LLC, is limited in its ability to process the amount of LFG currently being produced by the Landfill. Chiquita needs to install a new flare now in order to manage the LFG and to mitigate any potential odors that may be experienced by Chiquita’s neighbors. The new flare will have a capacity of 6,000 standard cubic feet per minute and is a low nitrogen oxides (NO_x) flare. The new flare has been manufactured and is ready to be installed. In order to install it, Chiquita first needs to pour a roughly twenty square foot concrete pad. The concrete pad will be located near the existing flares. The pad will then need to cure for approximately thirty days before Chiquita can place the flare on the pad.

Chiquita understands and appreciates Public Works' need to approve this type of construction work, but in order to act in the best interests of the neighboring community, Chiquita needs to pour the concrete pad and start the process of installing the new flare as soon as possible. Chiquita has, however, learned from Public Works that Public Works will not approve the installation of the flare pad until a permit is issued. Chiquita believes that it meets several exemptions set forth in Section J103.2 of the Los Angeles Building Code that would allow the installation of the pad without a grading permit, including, without limitation, J103.2 (1), (8) and (9). Chiquita must act now in order to avoid further potential odor impacts to the neighboring communities. Chiquita will notify Public Works forty-eight hours prior to pouring the concrete pad.

Please let me know if you have any questions or if you would like to discuss.

Sincerely,



John M. Perkey
Vice President, Deputy General Counsel,
Compliance and Government Affairs

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