



**CHIQUITA CANYON**  
*A Waste Connections Company*

May 31, 2024

***Via E-Mail***

Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force  
c/o County of Los Angeles Public Works  
Environmental Programs Division  
P.O. Box 1460  
Alhambra, CA 91802-1460  
taskforce@dpw.lacounty.gov  
coyola@pw.lacounty.gov

**Re: Chiquita Canyon, LLC's Monthly Update to the Integrated Waste Management Task Force**

Dear Members of the Integrated Waste Management Task Force:

Chiquita Canyon, LLC ("Chiquita") received a letter from the Integrated Waste Management Task Force (the "Task Force") dated April 19, 2021. The Task Force's letter requests that Chiquita provide monthly updates concerning a Notice of Violation ("NOV") that the County of Los Angeles Department of Regional Planning ("DRP") issued to Chiquita on June 11, 2020. The NOV alleges non-compliance with Conditions 68, 77, 79 and 113 of Chiquita's Conditional Use Permit ("CUP"). Chiquita previously provided monthly updates to the Task Force from April 2021 through April 2024. This letter serves as Chiquita's monthly update for May 2024.

On December 2, 2021, the County of Los Angeles Public Works ("PW") requested that these monthly updates include additional details concerning any NOVs issued by regulatory agencies and Chiquita's actions to mitigate those NOVs. This letter provides additional details concerning the NOVs issued since the last monthly update and Chiquita's actions to mitigate those NOVs.

On August 15, 2022, PW requested that these monthly updates clearly indicate whether or not Chiquita received an NOV from any regulatory agencies during the reporting month and, if so, that Chiquita include a copy of the NOV as an attachment to the letter. Since the last monthly update, Chiquita received eighteen NOVs from the South Coast Air Quality Management District ("SCAQMD") for alleged violations of SCAQMD Rule 402 and Health & Safety Code section 41700 dated from May 2 to May 31, 2024. Copies of these NOVs are provided in Attachment A.

On October 16, 2023, the Facility and Plan Review Subcommittee requested that these monthly updates include a detailed update on the status of Chiquita's compliance with its Stipulated Order for Abatement with SCAQMD and any other mitigation measures imposed by other regulatory agencies. Detailed information on Chiquita's implementation of the Stipulated Order can be found in the chart provided in Attachment B. Detailed information on Chiquita's implementation of the CalRecycle-recommended mitigation measures from the LEA's November 21, 2023 letter and subsequent correspondence and communications with the LEA can be found in the chart provided in Attachment C. Detailed information on Chiquita's implementation of the U.S. Environmental Protection Agency's ("EPA") Unilateral Administrative Order ("UAO") can be found in the chart provided in Attachment D.

### **June 2020 DRP NOV**

Chiquita has reached a settlement agreement with the County of Los Angeles (the "County"), which includes terms affecting CUP Conditions 77 and 79. This settlement agreement was approved by the County Board of Supervisors on October 11, 2022. The settlement agreement requires Chiquita to submit an application to modify its CUP consistent with the terms of the settlement agreement. Those terms include proposed modifications to CUP Conditions 77 and 79. Chiquita submitted the required CUP modification application on November 10, 2022. The hearing on the June 2020 NOV is stayed pending the outcome of this CUP modification process.

Chiquita continues to work on securing the permits and approvals required to begin construction on the new entrance along Wolcott Way under CUP Conditions 77 and 79. Chiquita has provided updates on the June 11, 2020 NOV and CUP Conditions 77 and 79 during previous meetings of the Chiquita Canyon Landfill Community Advisory Committee (the "CAC"). A link to these previous meetings and meeting materials summarizing the status of Chiquita's implementation of activities related to CUP Conditions 77 and 79 can be found on DRP's website, here <https://planning.lacounty.gov/public-hearings-and-meetings/chiquita-canyon-landfill/community-advisory-committee/>. Chiquita is happy to continue to provide these updates at future CAC meetings if requested.

### **SCAQMD Rule 402 NOVs**

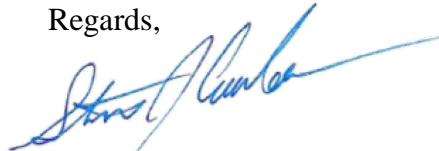
The SCAQMD Rule 402 NOVs were issued due to odors that allegedly emanated from the Chiquita Canyon Landfill (the "Landfill"). The source of any odors coming from the Landfill is a large and unexpected increase in the production of landfill gas and liquids at the Landfill. This increase in landfill gas and liquids production is due to an abnormal biotic or abiotic process (a reaction) taking place within an older portion of the Landfill waste mass. More information on the landfill reaction, recent air monitoring data, and analyses from Chiquita's toxicologists can be found on Chiquita's Odor Mitigation website, here: <https://chiquitacanyon.com/reports/odor-mitigation/>.

On September 6, 2023, Chiquita entered into a Stipulated Order for Abatement with the SCAQMD to address the NOV's issued by SCAQMD inspectors as a result of the landfill reaction, alleging violations of SCAQMD Rule 402 and Health & Safety Code section 41700. This Stipulated Order has since been modified on January 17, March 21, and April 24, 2024. A copy of the modifications to the Stipulated Order approved on March 21, 2024 is enclosed in Attachment E. A copy of the modifications approved on April 24, 2024 will be provided once it is available to Chiquita.

More information on Chiquita's implementation of the Stipulated Order can be found in Chiquita's monthly reports to the SCAQMD, which are posted on Chiquita's Odor Mitigation website, and in the chart provided in Attachment B.

Chiquita looks forward to continuing to provide the Task Force with updates on the June 11, 2020 NOV and any NOV's issued by regulatory agencies. Should you have any questions, please feel free to contact me.

Regards,



Steve Cassulo  
District Manager  
Chiquita Canyon, LLC

Attachments: A – Rule 402 NOV's from SCAQMD  
B – Chart of Chiquita's Implementation of the Stipulated Order for Abatement  
C – Chart of Chiquita's Implementation of the LEA's Mitigation Measures  
D – Chart of Chiquita's Implementation of the EPA UAO  
E – March 21, 2024 Modified Stipulated Order

cc: David Nguyen, Public Works  
Omid Mazdiyasni, Public Works

# Attachment A





South Coast Air Quality Management District  
21865 COPLEY DRIVE, DIAMOND BAR, CA 91765-4178

P 80623

# NOTICE OF VIOLATION

DATE OF VIOLATION		
Month:	Day:	Year:
05	02	2024

Facility Name: <u>Chiquita Canyon Landfill</u>	Facility ID#: <u>119219</u>	Sector: <u>VB</u>
Location Address: <u>29201 Henry Mayo Drive</u>	City: <u>Castaic</u>	Zip: <u>91384</u>
Mailing Address: <u>29201 Henry Mayo Drive</u>	City: <u>Castaic</u>	Zip: <u>91384</u>

YOU ARE HEREBY NOTIFIED THAT YOU HAVE BEEN CITED FOR ONE OR MORE VIOLATIONS OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT (SCAQMD) RULES, STATE LAW OR FEDERAL LAW. IF PROVEN, SUCH VIOLATION(S) MAY RESULT IN THE IMPOSITION OF CIVIL OR CRIMINAL PENALTIES.

EACH DAY A VIOLATION OCCURS MAY BE HANDLED AS A SEPARATE OFFENSE REGARDLESS OF WHETHER OR NOT ADDITIONAL NOTICES OF VIOLATION ARE ISSUED.

## DESCRIPTION OF VIOLATIONS

#	Authority*	Code Section or Rule No.	SCAQMD Permit to Operate or CARB Registration No.	Condition No. (If Applicable)	Description of Violation
1	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	<u>402</u>			<u>For discharging such quantities of air contaminants to cause injury, detriment, nuisance or annoyance to a considerable number of persons.</u>
2	<input checked="" type="checkbox"/> SCAQMD <input checked="" type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	<u>41700</u>			<u>For discharging such quantities of air contaminants to cause injury, detriment, nuisance or annoyance to a considerable number of persons.</u>
3	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
4	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
5	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				

Served To: <u>Steve Cassulo</u>	Phone: <u>661 371-9214</u>	Served By: <u>Karen Woullard</u>	Date Notice Served: <u>05/02/2024</u>
Title: <u>District Manager</u>	Email: <u>Steven.Cassulo@wasteconnections.com</u>	Phone No: <input checked="" type="checkbox"/> 909-396-2285 <input type="checkbox"/> 310-233-	Email: <u>KWoullard @ aqmd.gov</u>

\*Key to Authority Abbreviations:

SCAQMD - South Coast Air Quality Management District  
CCR - California Code of Regulations

CH&SC - California Health and Safety Code  
CFR - Code of Federal Regulations

Method of Service:

☐ In Person

☒ Certified Mail

VIOLATOR'S COPY





South Coast Air Quality Management District  
21865 COPLEY DRIVE, DIAMOND BAR, CA 91765-4178

P 75765

# NOTICE OF VIOLATION

DATE OF VIOLATION		
Month:	Day:	Year:
5	3	2024

Facility Name: Chiquita Canyon Land fill		Facility ID#: 119219	Sector: VB
Location Address: 29201 Henry Mayo Drive	City: Castaic	Zip: 91384	
Mailing Address: 29201 Henry Mayo Drive	City: Castaic	Zip: 91384	

YOU ARE HEREBY NOTIFIED THAT YOU HAVE BEEN CITED FOR ONE OR MORE VIOLATIONS OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT (SCAQMD) RULES, STATE LAW OR FEDERAL LAW. IF PROVEN, SUCH VIOLATION(S) MAY RESULT IN THE IMPOSITION OF CIVIL OR CRIMINAL PENALTIES.

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2	<input type="checkbox"/> SCAQMD <input checked="" type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	California Health & Safety Code 41700			For discharging such quantities of air contaminants to cause injury, detriment, nuisance, or annoyance to a considerable number of persons.
3	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
4	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
5	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				

Served To: Steve Cassulo	Phone: 661.371.9214	Served By: Alamayehn Solomon	Date Notice Served: 5-3-2024
Title: District Manager	Email: steven.cassulo@wasteconnections.com	Phone No: <input checked="" type="checkbox"/> 909-396-3256 <input type="checkbox"/> 310-233-	Email: asolomon @ aqmd.gov

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CFR - Code of Federal Regulations

Method of Service:

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Email &

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ORIGINAL





South Coast Air Quality Management District  
21865 COPLEY DRIVE, DIAMOND BAR, CA 91765-4178

P 80930

# NOTICE OF VIOLATION

DATE OF VIOLATION		
Month:	Day:	Year:
05	07	2024

Facility Name: CHICOITA CANYON LANDFILL		Facility ID#: 119219	Sector: VB
Location Address: 29201 HENRY MAYO DRIVE		City: CASTAIC	Zip: 91384
Mailing Address: 29201 HENRY MAYO DRIVE		City: CASTAIC	Zip: 91384

YOU ARE HEREBY NOTIFIED THAT YOU HAVE BEEN CITED FOR ONE OR MORE VIOLATIONS OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT (SCAQMD) RULES, STATE LAW OR FEDERAL LAW. IF PROVEN, SUCH VIOLATION(S) MAY RESULT IN THE IMPOSITION OF CIVIL OR CRIMINAL PENALTIES.

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1	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	RULE 402			FOR DISCHARGING SUCH QUANTITIES OF AIR CONTAMINANTS TO CAUSE INJURY, DETRIMENT, NUISANCE OR ANNOYANCE TO A CONSIDERABLE NUMBER OF PERSONS
2	<input type="checkbox"/> SCAQMD <input checked="" type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	CALH&S CODE 41700			FOR DISCHARGING SUCH QUANTITIES OF AIR CONTAMINANTS TO CAUSE INJURY, DETRIMENT, NUISANCE OR ANNOYANCE TO A CONSIDERABLE NUMBER OF PERSONS
3	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
4	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
5	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				

Served To: STEVE CASSULO		Phone: 661-371-9214	Served By: DANIEL del ROSARIO	Date Notice Served: 05-07-2024
Title: DISTRICT MANAGER	Email: STEVEN.CASSULO@WASTECONNECTIONS.COM	Phone No: <input checked="" type="checkbox"/> 909-396-2062 <input type="checkbox"/> 310-233-	Email: DDELROSARIO@aqmd.gov	

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CFR – Code of Federal Regulations

Method of Service:

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VIOLATOR'S COPY





South Coast Air Quality Management District  
21865 COPLEY DRIVE, DIAMOND BAR, CA 91765-4178

P 80018

# NOTICE OF VIOLATION

DATE OF VIOLATION		
Month	Day	Year
05	08	2024

Facility Name: Chiquita Canyon Landfill		Facility ID: 119219	Section: VB
Location Address: 29201 Henry Mayo Dr	City: Castaic	Zip: 91384	
Mailing Address: 29201 Henry Mayo Dr	City: Castaic	Zip: 91384	

YOU ARE HEREBY NOTIFIED THAT YOU HAVE BEEN CITED FOR ONE OR MORE VIOLATIONS OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT (SCAQMD) RULES, STATE LAW OR FEDERAL LAW. IF PROVEN, SUCH VIOLATION(S) MAY RESULT IN THE IMPOSITION OF CIVIL OR CRIMINAL PENALTIES.

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#	Authority*	Code Section or Rule No.	SCAQMD Permit to Operate or CARB Registration No.	Condition No. (If Applicable)	Description of Violation
1	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	Rule 402		—	For discharging such quantities of air contaminants to cause injury, detriment, nuisance or annoyance to a considerable number of persons.
2	<input type="checkbox"/> SCAQMD <input checked="" type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	California H&S Code Sec 41700		—	
3	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR			—	
4	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR			—	
5	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR			—	

Served To: Steve Cassulo	Phone: 661 371 9214	Served By: Daniel Rosas	Date Notice Served: 05/09/2024
Title: District Manager	Email: steveca@wastecconnections.com	Phone No: <input checked="" type="checkbox"/> 909-396-2080 <input type="checkbox"/> 310-233-	Email: drosas@aqmd.gov

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Method of Service

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& electronic mail

ORIGINAL





South Coast Air Quality Management District  
21865 COPLEY DRIVE, DIAMOND BAR, CA 91765-4178

P 77675

# NOTICE OF VIOLATION

DATE OF VIOLATION		
Month	Day	Year
05	09	2024

Facility Name <b>CHIKUITA CANYON LANDFILL</b>		Facility ID# <b>119219</b>	Sector <b>VB</b>
Location Address <b>29201 HENRY MAYO DRIVE</b>		City <b>CASTAIC</b>	Zip <b>91384</b>
Mailing Address <b>29201 HENRY MAYO DRIVE</b>		City <b>CASTAIC</b>	Zip <b>91384</b>

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1	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	<b>Rule 902</b>			<b>FOR DISCHARGING SUCH QUANTITIES OF AIR CONTAMINANTS TO CAUSE INJURY, DETRIMENT, NUISANCE OR ANNOYANCE TO A CONSIDERABLE NUMBER OF PERSONS.</b>
2	<input type="checkbox"/> SCAQMD <input checked="" type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	<b>CH&amp;SC 41700</b>			<b>FOR DISCHARGING SUCH QUANTITIES OF AIR CONTAMINANTS TO CAUSE INJURY, DETRIMENT, NUISANCE, OR ANNOYANCE TO A CONSIDERABLE NUMBER OF PERSONS.</b>
3	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
4	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
5	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				

Served To <b>STEVE CASSULO</b>	Phone <b>661-371-9214</b>	Served By <b>HUGO CAMPOS</b>	Date Notice Served <b>05/09/2024</b>
Title <b>DISTRICT MANAGER</b>	Email <b>steveca@wasteconnections.com</b>	Phone No. <input checked="" type="checkbox"/> 909-396-2110 <input type="checkbox"/> 310-233-	Email <b>hcampos @ aqmd.gov</b>

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CFR - Code of Federal Regulations

Method of Service:

☐ In Person

☒ Certified Mail

ORIGINAL





South Coast Air Quality Management District  
21865 COPLEY DRIVE, DIAMOND BAR, CA 91765-4178

P 80019

# NOTICE OF VIOLATION

DATE OF VIOLATION		
Month	Day	Year
05	10	2024

Facility Name: <b>Cniguity Canyon Landfill</b>	Facility ID: <b>119219</b>	Sector: <b>VB</b>
Location Address: <b>29201 Henry Mayo Dr</b>	City: <b>Castaic</b>	Zip: <b>91384</b>
Mailing Address: <b>29201 Henry Mayo Dr</b>	City: <b>Castaic</b>	Zip: <b>91384</b>

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## DESCRIPTION OF VIOLATIONS

#	Authority*	Code Section or Rule No.	SCAQMD Permit to Operate or CARB Registration No.	Condition No. (If Applicable)	Description of Violation
1	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	<b>Rjk 402</b>		— — —	<b>For discharging such quantities of air contaminants to cause injury, detriment, nuisance or annoyance to a considerable number of persons.</b>
2	<input type="checkbox"/> SCAQMD <input checked="" type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	<b>California H &amp; S Code Sec 41700</b>		— — —	
3	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR			— — —	
4	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR			— — —	
5	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR			— — —	

Served To: <b>Steve Cassulo</b>	Phone: <b>661 371 9214</b>	Served By: <b>Daniel Rosas</b>	Date Notice Served: <b>05/14/2024</b>
Title: <b>District Manager</b>	Email: <b>steve.ca@wasteconnections.com</b>	Phone No: <input checked="" type="checkbox"/> 909-396-2090 <input type="checkbox"/> 310-233-	Email: <b>drozas @ aqmd.gov</b>

\*Key to Authority Abbreviations

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CFR - Code of Federal Regulations

Method of Service:

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☒ Certified Mail  
**& electronic mail**

ORIGINAL





South Coast Air Quality Management District  
21865 COPLEY DRIVE, DIAMOND BAR, CA 91765-4178

P 76292

# NOTICE OF VIOLATION

DATE OF VIOLATION		
Month	Day	Year
5	13	24

Facility Name: <b>CHIQUITA CANYON LANDFILL</b>	Facility ID#: <b>119219</b>	Sector: <b>VB</b>
Location Address: <b>29201 HENRY MAYO DR.</b>	City: <b>CASTAIC</b>	Zip: <b>91384</b>
Mailing Address: <b>29201 HENRY MAYO DR.</b>	City: <b>CASTAIC</b>	Zip: <b>91384</b>

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2	<input type="checkbox"/> SCAQMD <input checked="" type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	41700		_____ _____ _____	FOR DISCHARGING SUCH QUANTITIES OF AIR CONTAMINANTS TO CAUSE INJURY, DETRIMENT, NUISANCE, OR ANNOYANCE TO A CONSIDERABLE NUMBER OF PERSONS
3	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR			_____ _____ _____	
4	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR			_____ _____ _____	
5	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR			_____ _____ _____	

Served To: <b>STEVE CASSULO</b>	Phone: <b>661-371-9214</b>	Served By: <b>JAIME MARTINEZ</b>	Date Notice Served: <b>5/13/2024</b>
Title: <b>DISTRICT MANAGER</b>	Email: <b>Steve.cassulo@wasteconnections.com</b>	Phone No: <input checked="" type="checkbox"/> 909-396-2137 <input type="checkbox"/> 310-233-	Email: <b>JMARTINEZ2@aqmd.gov</b>

\*Key to Authority Abbreviations:

SCAQMD – South Coast Air Quality Management District  
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CH&SC – California Health and Safety Code  
CFR – Code of Federal Regulations

Method of Service:

☐ In Person

☒ Certified Mail

ORIGINAL





# NOTICE OF VIOLATION

DATE OF VIOLATION		
Month	Day	Year
5	14	24

Facility Name <b>Chiquita Canyon LLC</b>	Facility ID# <b>119219</b>	State <b>VB</b>
Location Address <b>29201 Henry Mayo Drive</b>	City <b>Castaic</b>	Zip <b>91384</b>
Mailing Address <b>29201 Henry Mayo Drive</b>	City <b>Castaic</b>	Zip <b>91384</b>

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2 <input type="checkbox"/> SCAQMD <input checked="" type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	41700		— — —	//
3 <input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR			— — —	
4 <input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR			— — —	
5 <input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR			— — —	

Served To <b>Steven Cassulo</b>	Phone <b>661-371-9214</b>	Served By <b>Arely Gil Rojas</b>	Date Notice Served <b>5/14/24</b>
Title <b>District Manager</b>	Email <b>Steven.cassulo@wasteconnections.com</b>	Phone No. <input checked="" type="checkbox"/> 909-396-2183 <input type="checkbox"/> 310-233-	Email <b>ar Rojas @ aqmd.gov</b>
*Key to Authority Abbreviations: SCAQMD - South Coast Air Quality Management District CH&SC - California Health and Safety Code CCR - California Code of Regulations		Method of Service <input type="checkbox"/> In Person <input checked="" type="checkbox"/> Certified Mail	





South Coast Air Quality Management District  
21865 COPLEY DRIVE, DIAMOND BAR, CA 91765-4178

P 79613

# NOTICE OF VIOLATION

DATE OF VIOLATION		
Month	Day	Year
05	15	2024

Facility Name Ciniquita Canyon LLC		Facility ID 119219	Sector VB
Location Address 29201 Henry Mayo Drive		City Castaic	Zip 91384
Mailing Address 29201 Henry Mayo Drive		City Castaic	Zip 91384

YOU ARE HEREBY NOTIFIED THAT YOU HAVE BEEN CITED FOR ONE OR MORE VIOLATIONS OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT (SCAQMD) RULES, STATE LAW OR FEDERAL LAW. IF PROVEN, SUCH VIOLATION(S) MAY RESULT IN THE IMPOSITION OF CIVIL OR CRIMINAL PENALTIES.

EACH DAY A VIOLATION OCCURS MAY BE HANDLED AS A SEPARATE OFFENSE REGARDLESS OF WHETHER OR NOT ADDITIONAL NOTICES OF VIOLATION ARE ISSUED.

## DESCRIPTION OF VIOLATIONS

#	Authority*	Code Section or Rule No.	SCAQMD Permit to Operate or CARB Registration No.	Condition No. (If Applicable)	Description of Violation
1	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	Rule 402		— — —	For discharging such quantities of air contaminants to cause injury, detriment, nuisance or annoyance to considerable number of persons.
2	<input type="checkbox"/> SCAQMD <input checked="" type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	CH&SC 41700		— — —	For discharging such quantities of air contaminants to cause injury, detriment, nuisance or annoyance to a considerable number of persons.
3	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR			— — —	
4	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR			— — —	
5	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR			— — —	

Served To Steve Cassano	Phone 661 371 9214	Served By Abrin Niberto	Date Notice Served 05/15/2024
Title District Manager	Email steve.c@wiskconnections.com	Phone No. <input checked="" type="checkbox"/> 909-396-2314 <input type="checkbox"/> 310-233-	Email aniberto@aqmd.gov

\*Key to Authority Abbreviations

SCAQMD - South Coast Air Quality Management District  
CCR - California Code of Regulations

CH&SC - California Health and Safety Code  
CFR - Code of Federal Regulations

Method of Service

☐ In Person

☒ Certified Mail

ORIGINAL



South Coast Air Quality Management District  
21865 COPLEY DRIVE, DIAMOND BAR, CA 91765-4178

P 80020

# NOTICE OF VIOLATION

DATE OF VIOLATION		
Month:	Day:	Year:
05	16	2024

Facility Name: Chiquita Canyon Landfill		Facility ID#: 119219	Sector: VB
Location Address: 29201 Henry Mayo Dr		City: Castaic	Zip: 91384
Mailing Address: 29201 Henry Mayo Dr		City: Castaic	Zip: 91384

YOU ARE HEREBY NOTIFIED THAT YOU HAVE BEEN CITED FOR ONE OR MORE VIOLATIONS OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT (SCAQMD) RULES, STATE LAW OR FEDERAL LAW. IF PROVEN, SUCH VIOLATION(S) MAY RESULT IN THE IMPOSITION OF CIVIL OR CRIMINAL PENALTIES.

EACH DAY A VIOLATION OCCURS MAY BE HANDLED AS A SEPARATE OFFENSE REGARDLESS OF WHETHER OR NOT ADDITIONAL NOTICES OF VIOLATION ARE ISSUED.

## DESCRIPTION OF VIOLATIONS

#	Authority*	Code Section or Rule No.	SCAQMD Permit to Operate or CARB Registration No.	Condition No. (If Applicable)	Description of Violation
1	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	Rule 402			For discharging such quantities of air contaminants to cause injury, detriment, nuisance or annoyance to a considerable number of persons.
2	<input type="checkbox"/> SCAQMD <input checked="" type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	Califormin H&S codesec 41700			
3	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
4	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
5	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				

Served To: Steve Cassulo	Phone: 661-371 9214	Served By: Daniel Rosas	Date Notice Served: 05/16/2024
Title: District Manager	Email: steveca@waspconnections.com	Phone No: <input checked="" type="checkbox"/> 909-396-2080 <input type="checkbox"/> 310-233-	Email: drozas@aqmd.gov

\*Key to Authority Abbreviations:

SCAQMD – South Coast Air Quality Management District  
CCR – California Code of Regulations

CH&SC – California Health and Safety Code  
CFR – Code of Federal Regulations

Method of Service:

☒ In Person

☐ Certified Mail

**VIOLATOR'S COPY**





South Coast Air Quality Management District  
21865 COPLEY DRIVE, DIAMOND BAR, CA 91765-4178

P 78434

# NOTICE OF VIOLATION

DATE OF VIOLATION		
Month	Day	Year
05	20	24

Facility Name:	Chiquita Canyon LLC	Facility ID#:	119219	Section:	VB
Location Address:	29201 Henry Mayo Drive	City:	Castaic	Zip:	91384
Mailing Address:	29201 Henry Mayo Drive	City:	Castaic	Zip:	91384

YOU ARE HEREBY NOTIFIED THAT YOU HAVE BEEN CITED FOR ONE OR MORE VIOLATIONS OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT (SCAQMD) RULES, STATE LAW OR FEDERAL LAW. IF PROVEN, SUCH VIOLATION(S) MAY RESULT IN THE IMPOSITION OF CIVIL OR CRIMINAL PENALTIES.

EACH DAY A VIOLATION OCCURS MAY BE HANDLED AS A SEPARATE OFFENSE REGARDLESS OF WHETHER OR NOT ADDITIONAL NOTICES OF VIOLATION ARE ISSUED.

## DESCRIPTION OF VIOLATIONS

#	Authority	Code Section or Rule No.	SCAQMD Permit to Operate or CARB Registration No.	Condition No. (If Applicable)	Description of Violation
1	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	402			For discharging such quantities of air contaminants to cause injury, nuisance or annoyance to a considerable number of persons.
2	<input type="checkbox"/> SCAQMD <input checked="" type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	41700			// 1/
3	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
4	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				

Served To:	Steven Cassulo	Phone:	661-371-9214	Served By:	Arcely Gil Rojas	Date Notice Served:	5/20/24
Title:	District Manager	Email:	steven.cassulo@wasteconnections.com	Phone No.:	<input checked="" type="checkbox"/> 909-396-2183 <input type="checkbox"/> 310-233-	Email:	arogas@aqmd.gov

\*Key to Authority Abbreviations

SCAQMD - South Coast Air Quality Management District  
CCR - California Code of Regulations

CH&SC - California Health and Safety Code  
CFR - Code of Federal Regulations

Method of Service:

☐ In Person

☒ Certified Mail

ORIGINAL





South Coast Air Quality Management District  
21865 COPLEY DRIVE, DIAMOND BAR, CA 91765-4178

P 80021

# NOTICE OF VIOLATION

DATE OF VIOLATION		
Month	Day	Year
05	27	2014

Facility Name	Chiquita Canyon Landfill	Facility ID#	119219	Factor	VB
Location Address	29201 Henry Mayo Dr	City	Castaic	Zip	91384
Mailing Address	29201 Henry Mayo Dr	City	Castaic	Zip	91384

YOU ARE HEREBY NOTIFIED THAT YOU HAVE BEEN CITED FOR ONE OR MORE VIOLATIONS OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT (SCAQMD) RULES, STATE LAW OR FEDERAL LAW. IF PROVEN, SUCH VIOLATION(S) MAY RESULT IN THE IMPOSITION OF CIVIL OR CRIMINAL PENALTIES.

EACH DAY A VIOLATION OCCURS MAY BE HANDLED AS A SEPARATE OFFENSE REGARDLESS OF WHETHER OR NOT ADDITIONAL NOTICES OF VIOLATION ARE ISSUED.

## DESCRIPTION OF VIOLATIONS

#	Authority*	Code Section or Rule No.	SCAQMD Permit to Operate or CARB Registration No.	Condition No. (if Applicable)	Description of Violation
1	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	Rule 402			For discharging such quantities of air contaminants to cause injury, detriment, nuisance or annoyance to a considerable number of persons.
2	<input type="checkbox"/> SCAQMD <input checked="" type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	California H&S Code sec 41700			
3	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
4	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
5	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				

Served To:	Steve Cassulo	Phone:	661-371 9214	Served By:	Daniel Rosas	Date Notice Served:	05/22/2014
Title:	District Manager	Email:	steveC@wasteconnections.com	Phone No:	<input checked="" type="checkbox"/> 909-396-2080 <input type="checkbox"/> 310-233-	Email:	drosas@aqmd.gov
*Key to Authority Abbreviations: SCAQMD - South Coast Air Quality Management District CH&SC - California Health and Safety Code CCR - California Code of Regulations				Method of Service: <input type="checkbox"/> In Person <input checked="" type="checkbox"/> Certified Mail			

ORIGINAL





# NOTICE OF VIOLATION

DATE OF VIOLATION		
Month:	Day:	Year:
05	22	2024

Facility Name: <b>Chiquita Canyon Landfill</b>	Facility ID#: <b>119219</b>	Sector: <b>VB</b>
Location Address: <b>29201 Henry Mayo Drive</b>	City: <b>Castaic</b>	Zip: <b>91384</b>
Mailing Address: <b>29201 Henry Mayo Drive</b>	City: <b>Castaic</b>	Zip: <b>91384</b>

YOU ARE HEREBY NOTIFIED THAT YOU HAVE BEEN CITED FOR ONE OR MORE VIOLATIONS OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT (SCAQMD) RULES, STATE LAW OR FEDERAL LAW. IF PROVEN, SUCH VIOLATION(S) MAY RESULT IN THE IMPOSITION OF CIVIL OR CRIMINAL PENALTIES.

EACH DAY A VIOLATION OCCURS MAY BE HANDLED AS A SEPARATE OFFENSE REGARDLESS OF WHETHER OR NOT ADDITIONAL NOTICES OF VIOLATION ARE ISSUED.

## DESCRIPTION OF VIOLATIONS

#	Authority*	Code Section or Rule No.	SCAQMD Permit to Operate or CARB Registration No.	Condition No. (If Applicable)	Description of Violation
1	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	402			For discharging such quantities of air contaminants to cause injury, detriment, nuisance or annoyance to a considerable number of persons.
2	<input type="checkbox"/> SCAQMD <input checked="" type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	41700			For discharging such quantities of air contaminants to cause injury, detriment, nuisance or annoyance to a considerable number of persons.
3	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
4	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
5	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				

Served To: <b>Steve Cassulo</b>	Phone: <b>661 371-9214</b>	Served By: <b>Karen Woullard</b>	Date Notice Served: <b>05/22/2024</b>
Title: <b>District Manager</b>	Email: <b>Steven.cassulo@wasteconnections.com</b>	Phone No: <input checked="" type="checkbox"/> 909-396-2285 <input type="checkbox"/> 310-233-	Email: <b>KWoullard @aqmd.gov</b>

\*Key to Authority Abbreviations:

SCAQMD - South Coast Air Quality Management District  
CCR - California Code of Regulations

CH&SC - California Health and Safety Code  
CFR - Code of Federal Regulations

Method of Service:

☐ In Person

☒ Certified Mail

**VIOLATOR'S COPY**





South Coast Air Quality Management District  
21865 COPLEY DRIVE, DIAMOND BAR, CA 91765-4178

P 77676

# NOTICE OF VIOLATION

DATE OF VIOLATION		
Month	Day	Year
05	29	2024

Facility Name <b>CHIQUITA CANYON LANDFILL</b>		Facility ID#	Sector
Location Address <b>29201 HENRY MADO DRIVE</b>		City <b>CATAIC</b>	Zip <b>91389</b>
Mailing Address <b>29201 HENRY MADO DRIVE</b>		City <b>CATAIC</b>	Zip <b>91389</b>

YOU ARE HEREBY NOTIFIED THAT YOU HAVE BEEN CITED FOR ONE OR MORE VIOLATIONS OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT (SCAQMD) RULES, STATE LAW OR FEDERAL LAW. IF PROVEN, SUCH VIOLATION(S) MAY RESULT IN THE IMPOSITION OF CIVIL OR CRIMINAL PENALTIES.

EACH DAY A VIOLATION OCCURS MAY BE HANDLED AS A SEPARATE OFFENSE REGARDLESS OF WHETHER OR NOT ADDITIONAL NOTICES OF VIOLATION ARE ISSUED.

## DESCRIPTION OF VIOLATIONS

#	Authority*	Code Section or Rule No.	SCAQMD Permit to Operate or CARB Registration No.	Condition No. (If Applicable)	Description of Violation
1	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	<b>Rule 402</b>			<b>FOR DISCHARGING SUCH QUANTITIES OF AIR CONTAMINANTS TO CAUSE INJURY, DETRIMENT, NUISANCE OR ANNOYANCE TO A CONSIDERABLE NUMBER OF PERSONS.</b>
2	<input type="checkbox"/> SCAQMD <input checked="" type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	<b>CH&amp;SC 41700</b>			<b>FOR DISCHARGING SUCH QUANTITIES OF AIR CONTAMINANTS TO CAUSE INJURY, DETRIMENT, NUISANCE OR ANNOYANCE TO A CONSIDERABLE NUMBER OF PERSONS.</b>
3	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
4	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
5	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				

Served To: <b>STEVE CASSULO</b>	Phone: <b>661-371-9214</b>	Served By: <b>HUGO CAMPOS</b>	Date Notice Served: <b>05/29/2024</b>
Title: <b>DISTRICT MANAGER</b>	Email: <b>steve.ca@wasteconnections.com</b>	Phone No.: <input checked="" type="checkbox"/> 909-396-2110 <input type="checkbox"/> 310-233-	Email: <b>hcampos@aqmd.gov</b>

\*Key to Authority Abbreviations:

SCAQMD - South Coast Air Quality Management District  
CCR - California Code of Regulations

CH&SC - California Health and Safety Code  
CFR - Code of Federal Regulations

Method of Service:

☐ In Person

☒ Certified Mail

ORIGINAL





South Coast Air Quality Management District  
21865 COPLEY DRIVE, DIAMOND BAR, CA 91765-4178

P 75329

# NOTICE OF VIOLATION

DATE OF VIOLATION		
Month	Day	Year
5	28	24

Facility Name: <b>Chiquita Canyon Landfill</b>		Facility ID#: <b>119219</b>	Sector: <b>VB</b>
Location Address: <b>29201 Henry Mago Drive</b>		City: <b>Castaic</b>	Zip: <b>91384</b>
Mailing Address: <b>29201 Henry Mago Drive</b>		City: <b>Castaic</b>	Zip: <b>91384</b>

YOU ARE HEREBY NOTIFIED THAT YOU HAVE BEEN CITED FOR ONE OR MORE VIOLATIONS OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT (SCAQMD) RULES, STATE LAW OR FEDERAL LAW. IF PROVEN, SUCH VIOLATION(S) MAY RESULT IN THE IMPOSITION OF CIVIL OR CRIMINAL PENALTIES.

EACH DAY A VIOLATION OCCURS MAY BE HANDLED AS A SEPARATE OFFENSE REGARDLESS OF WHETHER OR NOT ADDITIONAL NOTICES OF VIOLATION ARE ISSUED.

## DESCRIPTION OF VIOLATIONS

#	Authority*	Code Section or Rule No.	SCAQMD Permit to Operate or CARB Registration No.	Condition No. (If Applicable)	Description of Violation
1	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	402		_____ _____ _____	For discharging such quantities of air contaminants to cause injury, detriment, nuisance or annoyance to a considerable number of persons
2	<input type="checkbox"/> SCAQMD <input checked="" type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	41700		_____ _____ _____	
3	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR			_____ _____ _____	
4	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR			_____ _____ _____	
5	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR			_____ _____ _____	

Served To: <b>Steve Cassulo</b>	Phone: <b>661.371.9244</b>	Served By: <b>Tung Allen Vu</b>	Date Notice Served: <b>5.29.24</b>
Title: <b>District Manager</b>	Email: <b>stevenc@wasteconnections.com</b>	Phone No: <input checked="" type="checkbox"/> 909-396-2673 <input type="checkbox"/> 310-233-	Email: <b>tallen.vu@aqmd.gov</b>

\*Key to Authority Abbreviations:

SCAQMD - South Coast Air Quality Management District  
CCR - California Code of Regulations

CH&SC - California Health and Safety Code  
CFR - Code of Federal Regulations

Method of Service:

☐ In Person

☒ Certified Mail

ORIGINAL





South Coast Air Quality Management District  
21865 COPLEY DRIVE, DIAMOND BAR, CA 91765-4178

P 79616

# NOTICE OF VIOLATION

DATE OF VIOLATION		
Month:	Day:	Year:
05	29	2024

Facility Name:	Chiquita Canyon LLC	Facility ID#:	119219	Sector:	VB
Location Address:	29201 Henry Mayo Drive	City:	Castaic	Zip:	91384
Mailing Address:	29201 Henry Mayo Drive	City:	Castaic	Zip:	91384

YOU ARE HEREBY NOTIFIED THAT YOU HAVE BEEN CITED FOR ONE OR MORE VIOLATIONS OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT (SCAQMD) RULES, STATE LAW OR FEDERAL LAW. IF PROVEN, SUCH VIOLATION(S) MAY RESULT IN THE IMPOSITION OF CIVIL OR CRIMINAL PENALTIES.

EACH DAY A VIOLATION OCCURS MAY BE HANDLED AS A SEPARATE OFFENSE REGARDLESS OF WHETHER OR NOT ADDITIONAL NOTICES OF VIOLATION ARE ISSUED.

## DESCRIPTION OF VIOLATIONS

#	Authority*	Code Section or Rule No.	SCAQMD Permit to Operate or CARB Registration No.	Condition No. (If Applicable)	Description of Violation
1	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	Rule 402			For discharging such quantities of air contaminants to cause injury, detriment nuisance or annoyance to considerable number of persons.
2	<input type="checkbox"/> SCAQMD <input checked="" type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	CH&SC 41700			For discharging such quantities of air contaminants to cause injury, detriment nuisance or annoyance to considerable number of persons.
3	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
4	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
5	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				

Served To:	Steve Cassulo	Phone:	661.371.9214	Served By:	Abril Alberto	Date Notice Served:	05/29/2024
Title:	District Manager	Email:	steveca@wasteconnections.com	Phone No:	<input checked="" type="checkbox"/> 909-396-2318 <input type="checkbox"/> 310-233-	Email:	aalberto@aqmd.gov

*Key to Authority Abbreviations:	SCAQMD - South Coast Air Quality Management District CCR - California Code of Regulations	CH&SC - California Health and Safety Code CFR - Code of Federal Regulations	Method of Service:	<input type="checkbox"/> In Person <input checked="" type="checkbox"/> Certified Mail
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ORIGINAL





South Coast Air Quality Management District  
21865 COPLEY DRIVE, DIAMOND BAR, CA 91765-4178

P 73573

# NOTICE OF VIOLATION

DATE OF VIOLATION  
Month Day Year  
05 30 24

Facility Name <b>CHIRUITA CANYON LLC</b>	Facility EIN	Section
Location Address <b>29201 HENRY MAYO DR</b>	City <b>CASTAIC</b>	Zip <b>91384</b>
Mailing Address <b>29201 HENRY MAYO DR</b>	City <b>CASTAIC</b>	Zip <b>91384</b>

YOU ARE HEREBY NOTIFIED THAT YOU HAVE BEEN CITED FOR ONE OR MORE VIOLATIONS OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT (SCAQMD) RULES, STATE LAW OR FEDERAL LAW. IF PROVEN, SUCH VIOLATION(S) MAY RESULT IN THE IMPOSITION OF CIVIL OR CRIMINAL PENALTIES.

EACH DAY A VIOLATION OCCURS MAY BE HANDLED AS A SEPARATE OFFENSE REGARDLESS OF WHETHER OR NOT ADDITIONAL NOTICES OF VIOLATION ARE ISSUED.

## DESCRIPTION OF VIOLATIONS

#	Authority*	Code Section or Rule No.	SCAQMD Permit to Operate or CAR# Registration No.	Condition No. (If Applicable)	Description of Violation
1	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CHSBC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	Rule 402			For discharging such quantities of air contaminants to cause injury, detriment, nuisance or annoyance to considerable number of persons
2	<input type="checkbox"/> SCAQMD <input checked="" type="checkbox"/> CHSBC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	CHSBC 41700			For discharging such quantities of air contaminants to cause injury, detriment, nuisance or annoyance to considerable number of persons
3	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CHSBC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
4	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CHSBC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
5	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CHSBC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				

Served To <b>STEVE CASSULO</b>	Phone <b>661.371.9214</b>	Served By <b>BILLY ANDRINE</b>	Date Served <b>05/30/24</b>
Title <b>DISTRICT MANAGER</b>	Email <b>steve.c@wasteconnections.com</b>	Phone <input checked="" type="checkbox"/> 909-396-2652 <input type="checkbox"/> 310-233-	Email <b>b.andrine</b> @ aqmd.gov
*Key to Authority Abbreviations: SCAQMD - South Coast Air Quality Management District CHSBC - California Health and Safety Code CCR - California Code of Regulations		Method of Service <input type="checkbox"/> In Person <input checked="" type="checkbox"/> Certified Mail	

ORIGINAL



South Coast Air Quality Management District  
21865 COPLEY DRIVE, DIAMOND BAR, CA 91765-4178

P 78329

# NOTICE OF VIOLATION

DATE OF VIOLATION		
Month:	Day:	Year:
05	31	'24

Facility Name: <u>Chiquita Canyon Landfill</u>		Facility ID#: <u>119219</u>	Sector: <u>VB</u>
Location Address: <u>29201 Henry Mayo Dr.</u>		City: <u>Castaic</u>	Zip: <u>91384</u>
Mailing Address: <u>29201 Henry Mayo Dr.</u>		City: <u>Castaic</u>	Zip: <u>91384</u>

YOU ARE HEREBY NOTIFIED THAT YOU HAVE BEEN CITED FOR ONE OR MORE VIOLATIONS OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT (SCAQMD) RULES, STATE LAW OR FEDERAL LAW. IF PROVEN, SUCH VIOLATION(S) MAY RESULT IN THE IMPOSITION OF CIVIL OR CRIMINAL PENALTIES.

EACH DAY A VIOLATION OCCURS MAY BE HANDLED AS A SEPARATE OFFENSE REGARDLESS OF WHETHER OR NOT ADDITIONAL NOTICES OF VIOLATION ARE ISSUED.

## DESCRIPTION OF VIOLATIONS

#	Authority*	Code Section or Rule No.	SCAQMD Permit to Operate or CARB Registration No.	Condition No. (If Applicable)	Description of Violation
1	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	402		— — —	For discharging such quantities of air contaminants to cause injury, detriment, nuisance or annoyance to a considerable number of persons.
2	<input type="checkbox"/> SCAQMD <input checked="" type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	41700		— — —	For discharging such quantities of air contaminants to cause injury, detriment, nuisance or annoyance to a considerable number of persons.
3	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR			— — —	
4	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR			— — —	
5	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR			— — —	

Served To: <u>Steve Cassulo</u>		Phone: <u>661-371-9214</u>	Served By: <u>Niyati Rami</u>	Date Notice Served: <u>05/31/24</u>
Title: <u>District Manager</u>	Email: <u>STEVE.CASSULO@wasteconnections.com</u>	Phone No: <input checked="" type="checkbox"/> 909-396-2249 <input type="checkbox"/> 310-233-	Email: <u>nrami</u>	@ aqmd.gov
*Key to Authority Abbreviations: SCAQMD – South Coast Air Quality Management District CCR – California Code of Regulations			Method of Service: <input type="checkbox"/> In Person <input checked="" type="checkbox"/> Certified Mail	

ORIGINAL

## Attachment B

**Action Items for South Coast Air Quality Management District**

**Case No. 6177-4 Stipulated Order for Abatement (modified on April 24, 2024)**

**Completed Actions**

<b>Condition No.</b>	<b>Key Action</b>	<b>Start Date/Deadline</b>	<b>Status</b>
1(f)	Designate an employee able to receive notifications related to odor surveillance results	9/7/2023	Completed
31	Submit completed design for the geosynthetic cover	9/12/2023	Completed
13	Connect 18 vertical dual extraction wells to the LFG system	9/15/2023	Completed
45	Install, maintain, and operate 1,000 feet or more of Semi-Permanent Vapor Odor Control in the Reaction Area	9/20/2023	Completed
1(a)	Contract with a trained third party to conduct odor surveillance	10/6/2023	Completed
12, 12(a)	Form the Reaction Committee	10/6/2023	Completed
12	Provide Reaction Committee member information to South Coast AQMD	10/6/2023	Completed
16	Submit permit modification application for LFG system	10/6/2023	Completed
19	Submit permit modification application for LFG condensate and leachate collection/storage system	10/6/2023	Completed
12(i)	Submit report on initial flux chamber study	10/31/2023	Completed
15	Notify South Coast AQMD of number of wells added to wellfield	10/31/2023	Completed
21	Submit permit application for Flare 4	10/31/2023	Completed
31	Notify South Coast AQMD on progress of procuring and installing cover	10/31/2023	Completed
44	Obtain and install onsite MET station in the Reaction Area	10/31/2023	Completed
17	Identify LFG wells with worst liquid impaction issues in the Reaction Area	11/3/2023	Completed
12(g)(iv)	Submit report on landfill best management practices	11/6/2023	Completed
20	Install and operate Flare 3; notify South Coast AQMD	11/24/2023	Completed: installed 11/15; notified 11/17
12(g)(iii)	Submit report on feasibility of continuous community emission monitoring system	12/1/2023	Completed
32	Submit report on air dispersion modeling	12/1/2023	Completed

<b>Condition No.</b>	<b>Key Action</b>	<b>Start Date/Deadline</b>	<b>Status</b>
18	Submit proposed Reaction Area dewatering guidelines	12/5/2023	Completed
12(g)(ii)	Submit report on investigation on landfill reaction cause and solutions to slow the reaction	12/8/2023	Completed
12(g)(iii)	Submit workplan for installation of continuous monitoring	12/31/2023	Completed
12(i)	Submit proposal for second flux chamber study	12/31/2023	Completed
12(g)(v)	Submit report on health risks of DMS	1/15/2024	Completed
32(b)	Submit proposal for additional air modeling study	1/15/2024	Completed
34	Provide South Coast AQMD with access to all real-time continuous monitoring data for TRS and TAC	1/19/2024	Completed
35	Provide South Coast AQMD all SOPs and QA/QC documents for air monitoring equipment	1/19/2024	Completed
41	Submit Rule 1150 Landfill Excavation Plan	1/30/2024	Completed
15(a)	Provide the design and installation schedule for 70 new wells and their associated piping	1/31/2024	Completed
36	Provide updates to South Coast AQMD on the installation of the continuous BTEX/VOC monitoring equipment	2/16/2024	Completed
37	Take at least 10 liquid samples from wells with pumps in the Reaction Area with the highest average temps to the extent possible and analyze per USEPA Method 624.1	3/5/2024	Completed
37	Submit the results to South Coast AQMD along with the lab analysis from the 10/20/23 sampling event	Within 1 week of the results	Completed
26	Prepare and submit to South Coast AQMD the Discharge of Pressurized Leachate Containment Feasibility Study	3/12/2024	Completed
50	Provide a workplan listing the actions Chiquita plans to take to address the reaction	3/13/2024	Completed
17	Install dewatering sumps/pumps in at least 60% of vertical wells in the Reaction Area capable of extracting liquids; if infeasible, provide detailed rationale and reasoning in Condition 8 report and continue implementing dewatering guidelines	3/15/2024	Completed
36	Provide updates to South Coast AQMD on the installation of the continuous BTEX/VOC monitoring equipment	3/17/2024	Completed
67	Designate an Inspection Liaison	3/25/2024	Completed

<b>Condition No.</b>	<b>Key Action</b>	<b>Start Date/Deadline</b>	<b>Status</b>
64	Provide Leachate Management Plan submitted to EPA under UAO to South Coast AQMD	3/28/2024	Completed
12(a)(iv)	Add Reaction Committee member relating to public health		Completed
12(i)	Conduct second flux chamber study	No later than 90 days after South Coast AQMD approval of protocol	Completed
18	Revise dewatering guidelines and resubmit for approval	4/4/2024	Completed
56	Conduct sampling and analysis of vapors in headspace of leachate tanks in #9 Top Deck Tank Farm	4/4/2024	Completed
15(b)(i)	Submit an updated design and installation schedule incorporating the additional wells under Condition 15(a) and (b) and their associated piping	4/18/2024	Completed
56	Submit report of headspace tank sampling and analysis parameters and lab results to South Coast AQMD	4/18/2024	Completed
66	Submit recommendations regarding installation of remote well pressure and temperature monitoring system	4/19/2024	Completed
34(a)	Ensure that weekly benzene and live H2S and methane data from the offsite monitors and/or 24-hour samples are posted on the webpage in graphical format with a dashed/dotted line for RELs	4/20/2024	Completed
57	Submit expedited permit modification application for Landfill Gas Condensate and Leachate Collection/Storage System to increase liquid storage capacity	4/22/2024	Completed
60	Submit expedited permit modification application for Landfill Gas Collection to include tie-in of the treatment system vapor vent lines	4/22/2024	Completed
63	Submit schematic of current leachate treatment and storage system to South Coast AQMD	4/22/2024	Completed
69 (old)	Submit workplan to restart leachate pumping to South Coast AQMD Hearing Board	4/22/2024	Completed
1(f)	Designate an employee in the Reaction Area and the working face area able to receive notifications related to odor surveillance results	4/25/2024	Completed

<b>Condition No.</b>	<b>Key Action</b>	<b>Start Date/Deadline</b>	<b>Status</b>
12(g)(i)	Submit report on study of treatment of DMS and preventative mechanisms for DMS formation	4/30/2024	Completed
34(c)	Retain a third party to develop an automatic electronic notification system for the community air monitoring	4/30/2024	Completed
36	Install and maintain continuous BTEX/VOC monitoring equipment at MS-10 and MS-12	5/1/2024	Completed
36	Develop a monitoring plan for the microGCs	5/1/2024	Completed
36(a)	Make continuous BTEX/VOC monitoring data available on Chiquita's Odor Mitigation webpage	Upon installation	Completed
36(b)	Increase the number of 24-hour canister sampling and analysis for VOCs at MS-06 through MS-12 to 3 times per week	3/22/2024 until microGC monitors are installed at MS-10 and MS-12	Completed
32(c)	Revise air modeling study proposal and resubmit to South Coast AQMD	5/8/2024	Completed
72(b)	Submit source test protocol for vapor flow testing	5/17/2024	Completed
61	Submit expedited permit modification application for Landfill Gas Flare System (Flare Nos. 1 and 2) to include combustion vapor from treatment system	5/21/2024	Completed
62	Submit expedited permit modification application for Landfill Gas Flares System (Flare No. 3) to include combustion vapor from treatment system	5/21/2024	Completed
71	Submit a complete permit application for the landfill gas collection system under the geosynthetic cover	5/21/2024	Completed
73	Prepare an inventory of all internal combustion engine equipment rated greater than 50 HP onsite as of April 25, 2024	5/21/2024	Completed
34(c)	Third party must develop and install an automatic electronic notification system for the community air monitoring	5/30/2024	Completed

#### Ongoing Actions

<b>Condition No.</b>	<b>Key Action</b>	<b>Start Date/Deadline</b>	<b>Status</b>
1	Conduct odor surveillance	9/7/2023; ongoing	Ongoing
1(e)	Maintain odor surveillance log	9/7/2023; ongoing	Ongoing

Condition No.	Key Action	Start Date/Deadline	Status
1(f)	Review and modify odor mitigation measures based on odor surveillance results, as appropriate	9/7/2023; ongoing	Ongoing
1(f)	Have trained employee(s) or contractor(s) re-perform odor surveillance following deployment of additional fresh trash odor mitigation to assess if trash odors have dissipated	4/25/2024; ongoing	Ongoing
2	Log odor surveillance notifications and actions taken in response	9/7/2023; ongoing	Ongoing
3	Expedite replacement of granular activated carbon media in LFG treatment system	9/7/2023; ongoing	Ongoing; see Condition 8 monthly reports
3	Ensure adequate stock of all odor control products and supplies are maintained on site	9/7/2023; ongoing	Ongoing
3(a)	Monitor and record landfill gas temperature at the inlet of the treatment system; temp must not exceed 145°F	1/18/2024; ongoing	Ongoing
4	Maximize LFG combustion in all flares to limit release of raw LFG	3/22/2024; ongoing	Ongoing
4	Prioritize Flare 2 and Flare 3 over Flare 1	9/7/2023; ongoing	Ongoing
5	Sample LFG sulfur compounds combusted using colorimetric tests for H <sub>2</sub> S	3/22/2024; weekly	Ongoing
5	Sample LFG sulfur compounds for total sulfur compounds as H <sub>2</sub> S using South Coast AQMD Method 307-91	3/22/2024; daily	Ongoing
5	Sample, analyze, and record LFG sulfur compounds and speciated organic compounds in the raw, pre-treatment and pre-control LFG from the Reaction Area for total sulfur compounds at H <sub>2</sub> S using SCAQMD Method 307-91 and for speciated organic compounds using EPA Method TO-15	3/22/2024; monthly	Ongoing
6	Maintain adequate stock of appropriately ranged colorimetric tubes	9/7/2023; ongoing	Ongoing
7(a), (b)	Measure the total amount of landfill gas combusted at the facility; measure the daily flow of landfill gas not flared	9/7/2023; ongoing	Ongoing; see Condition 8 monthly reports
8	Submit monthly written report to South Coast AQMD	9/30/2023; monthly	Ongoing; posted on Chiquita's website



Condition No.	Key Action	Start Date/Deadline	Status
9	Conduct integrated landfill surface sampling	9/20/2023; ongoing	Ongoing
9(b)	Review and revise Reaction Area	10/6/2023; ongoing	Ongoing
9(a)	Submit revised Reaction Area map and related documentation to South Coast AQMD	10/6/2023; monthly	Ongoing; posted on Chiquita's website
10	Conduct instantaneous landfill surface monitoring	9/13/2023; ongoing	Ongoing
11	Continue operating flares and treatment system despite exceedances of the TRS and SOx limits	9/7/2023; ongoing	Ongoing
11	Submit deviation reports in accordance with Title V permit to South Coast AQMD	1/18/2024; ongoing	Ongoing
12(f)	Host a monthly virtual meeting with all members of the Reaction Committee and South Coast AQMD technical staff	March 2024; monthly	Ongoing
12(f)(iv)	Following each Reaction Committee meeting, prepare meeting summary and post on webpage	March 2024; monthly	Ongoing; posted on Chiquita's website
12(h)	Post all expert reports on Odor Mitigation webpage	9/7/2023; ongoing	Ongoing; posted on Chiquita's website
13	Expand gas well system	9/7/2023; ongoing	Ongoing
13	Continue to operate the two sumps with pumps along the west slope; as new landfill gas wells are completed, begin operating them	3/22/2024; ongoing	Ongoing
14	Address wells with temps above 170 degrees Fahrenheit	9/7/2023; ongoing	Ongoing
14	Monitor each LFG system well for temperature at least monthly	9/7/2023; ongoing	Ongoing
14	Continue to operate all wells despite temp exceedances as necessary	9/7/2023; ongoing	Ongoing
14(a)	Ensure the operation of the collection system equipment does not result in the release of raw landfill gas or condensate into the atmosphere	1/18/2024; ongoing	Ongoing
14(b)	Report breakdowns or malfunctions of the collection system resulting in the emission of raw landfill gas within one hour after occurrence or within one hour of the time said person knew or reasonably should have known of its occurrence. Take immediate remedial measure to correct the breakdown	1/18/2024; as needed	Ongoing

Condition No.	Key Action	Start Date/Deadline	Status
	or malfunction and prevent further emissions		
15	Add vertical dual extraction wells	9/7/2023; ongoing	Ongoing
15	Expand well-field	9/7/2023; ongoing	Ongoing
15	Document subsequent additions to the wellfield	9/7/2023; ongoing	Ongoing; see Condition 8 monthly reports
15(a)	Provide updates to the design and schedule for the 70 wells in Condition 8 reports	2/19/2024; ongoing	Ongoing; see Condition 8 monthly reports
15(c)	Notify South Coast AQMD which wells are scheduled to be installed the following week	1/18/2024; ongoing	Ongoing
15(e)	Use a landfill gas control box vented to an approved emissions control system while drilling a new well	1/18/2024; ongoing	Ongoing
15(f)	Complete and cap each well the same day its construction commences unless the well hole is completely covered or the subsequently installed pipe is capped	1/18/2024; ongoing	Ongoing
15(g)	Connect each well to an operating header or seal the ends of the well with blind flanges, glued or fused caps, or other approved seals as soon as the well is installed	1/18/2024; ongoing	Ongoing
15(h)	Properly cover and seal all openings and connections of the collection system in accordance with Title V permit and all applicable rules and regulations	1/18/2024; ongoing	Ongoing
15(i)	Install additional stainless steel, carbon steel, or CPVC wells in the Reaction Area	1/18/2024; ongoing	Ongoing
15(l)	Install well boots seals on all wells in Reaction Area	1/18/2024; ongoing	Ongoing
15(n)	All new vertical wells installed in the Reaction Area must be dual extraction wells	4/25/2024; ongoing	Ongoing
15(n)	For 75% of wells, install dewatering infrastructure within 30 days of completion of well drilling	4/25/2024; ongoing	Ongoing
15(n)	For 25% of wells, install dewatering infrastructure within 60 days of completion of well drilling	4/25/2024; ongoing	Ongoing

Condition No.	Key Action	Start Date/Deadline	Status
17, 17(a)	Expediently dewater wells to the maximum extent feasible; take proactive measure to remove additional liquids in the Reaction Area	3/22/2024; ongoing	Ongoing; see Condition 8 monthly reports
18	Implement proposed Reaction Area dewatering guidelines and implementation procedures	12/5/2023; ongoing	Ongoing
22	Continue using portable thermal oxidizer(s) until Reaction Committee concludes they are no longer needed; notify South Coast AQMD within 48 hours of determination	9/7/2023; ongoing	Ongoing
23	Continue using Flares 1 and 2 until Flare 4 is permitted and operational.	9/7/2023; ongoing	Ongoing
24	Operate and maintain the landfill to prevent standing leachate and the pooling or ponding of leachate exposed to the atmosphere	1/18/2024; ongoing	Ongoing
24	If pooling or ponding of liquid/leachate occurs, immediately collect and contain it in a sealed tanker truck or leachate tank, or promptly perform repairs to redirect the leachate into the leachate collection system	1/18/2024; ongoing	Ongoing
25	When encountering a discharge of pressurized leachate, mitigate odors and the dispersion and exposure of leachate into the atmosphere to the maximum extent possible. Once the discharge of pressurized leachate ends, remove soil saturated with leachate or add dry soil cover	1/18/2024; ongoing	Ongoing
27(a)	Measure, record, and report on leachate temps within all the 6-inch pipes feeding into the onsite frac tanks and at the piping leading into all tank farms, including a map of the monitoring locations and the tanks/tank farms downstream of the monitoring locations	4/25/2024; ongoing	Ongoing; see Condition 8 monthly reports
27(b)	Conduct and document inspections for leachate seeps twice each calendar day	1/18/2024; ongoing	Ongoing; see Condition 8 monthly reports
27(c)	Compile and report the details of the inspection logs, including any ongoing leachate seepage and pooling	1/23/2024; weekly	Ongoing; see weekly leachate inspection reports
27(d)	Measure and record quantities of leachate sent offsite for disposal/ treatment	1/18/2024; ongoing	Ongoing; see Condition 8 monthly reports

Condition No.	Key Action	Start Date/Deadline	Status
27(d)	Submit copies of leachate manifests to South Coast AQMD within 3 weeks of request	1/18/2024; as requested	Ongoing
27(d)	If Chiquita begins onsite leachate treatment, record on a weekly basis quantities of leachate collected and treated onsite	1/18/2024; Ongoing	Ongoing
28	Operate and maintain the landfill gas and liquids systems with materials capable of handling gases/liquids at the temps measured. Utilize casing materials for elevated temp wells as agreed upon with the LEA	1/18/2024; ongoing	Ongoing
28	Provide information pertaining to installed equipment and specifications to SCAQMD upon request	1/18/2024; ongoing	Ongoing
29	Ensure proper capacity to accumulate leachate onsite and/or dispose of it at appropriate facilities	3/22/2024; ongoing	Ongoing
30	Visually inspect landfill cover and geosynthetic cover in and around the Reaction Area; repair landfill cover and geosynthetic cover within 2 hours of identification, safety permitting, or schedule permanent repair of geosynthetic cover immediately and permanently repair as soon as possible; maintain log of cover repairs	4/25/2024; ongoing	Ongoing; see Condition 8 monthly reports
31	Notify South Coast AQMD on progress of procuring and installing cover	10/31/23; ongoing	Ongoing; see Condition 8 monthly reports
33	Expand and enhance current ambient air monitoring program pursuant to DPH's direction	9/7/2023; ongoing	Ongoing
33	Submit ambient air monitoring reports for DPH to South Coast AQMD	9/7/2023; as needed	Ongoing
34(b)	Provide weekly data collected by the offsite monitors on Chiquita's Odor Mitigation webpage in downloadable format	2/16/2024; ongoing	Ongoing
34(b)(i)	Provide flags or other visual indicators of missing air monitoring or test data on the website and document the range of dates/times with missing or affected data and the reason for the missing or affected data	3/29/2024; ongoing	Ongoing

Condition No.	Key Action	Start Date/Deadline	Status
35	Provide updates to the QA/QC docs, a calibration log, and maintenance activities performed	1/18/2024; ongoing	Ongoing; see Condition 8 monthly reports
35(a)	Provide South Coast AQMD with the same access as Chiquita to onsite and offsite monitoring equipment	1/18/2024; ongoing	Ongoing
35(a)	Provide South Coast AQMD list of appropriate PPE within 24 hours of request	1/18/2024; ongoing	Ongoing
35(b)	Implement quality control measures as specified by South Coast AQMD within 30 days of notification	4/25/2024; as needed	Ongoing
38	Take at least one representative sample of liquids from the Reaction Area and one from the bottom tanks and analyze per USEPA Method 624.1 for VOCs and TACs	1/18/2024; monthly	Ongoing
38	Post leachate analytical results on website and provide to South Coast AQMD within 1 week of receipt from contract lab	1/18/2024; ongoing	Ongoing
39	Maintain Odor Mitigation webpage; update weekly	9/7/2023; weekly	Ongoing
39	Translate Odor Mitigation webpage and reports into Spanish; submit reports to translation service within 2 business days of posting on webpage and upload to webpage within 2 business days of receipt from translation service	4/25/2024; ongoing	Ongoing; posted on Chiquita's website
40	Host community information meetings monthly based on receipt of NOVs	9/14/2023; ongoing	Ongoing
42	Implement additional mitigation measures while conducting non-exempt Rule 1150 excavation activities until final approval of Rule 1150 landfill excavation plan	1/18/2024; as needed	Ongoing
42(a)	Notify South Coast AQMD at least two days before and within five days after completion of excavation activities while conducting non-exempt Rule 1150 excavation activities until final approval of Rule 1150 landfill excavation plan	1/18/2024; as needed	Ongoing
43	Maintain fresh trash odor mitigation measures during Unfavorable Wind Conditions	9/7/2023; ongoing	Ongoing
43(f)	If trash-based odors are detected during Condition 1(f) odor surveillance, deploy	4/25/2024; ongoing	Ongoing

Condition No.	Key Action	Start Date/Deadline	Status
	additional orchard fans to working face and surrounding area		
43(f)	If trash-based odors are not reduced within 1 hour of deployment of additional fans, reduce working face by 25% of the day's total size	4/25/2024; ongoing	Ongoing
44	Maintain onsite MET station in the Reaction Area	10/31/2023; ongoing	Ongoing
45	Maintain and operate 1,000 feet or more of Semi-Permanent Vapor Odor Control in the Reaction Area	9/20/2023; ongoing	Ongoing
46, 47	Operate and maintain a landfill perimeter odor control misting system	9/7/2023; ongoing	Ongoing
50	Follow the direction of EPA to implement the Master Work Plan submitted to EPA under the Unilateral Administrative Order (UAO)	4/25/2024; ongoing	Ongoing
51	Permit South Coast AQMD personnel to conduct inspections deemed necessary, including sample collection	1/18/2024; ongoing	Ongoing
51	When South Coast AQMD observes uncontrolled liquid that may be leachate during an inspection, collect a sample within 24 hours, submit for expedited testing for VOCs, and submit test results within 24 hours of receipt of results (but no later than 96 hours after collection)	3/22/2024; ongoing	Ongoing
51	Provide South Coast AQMD with any updates to the Health and Safety Plan within 1 business day of updates going into effect	4/25/2024; ongoing	Ongoing
51(a)	To the extent required by the Health and Safety Plan, maintain onsite at least two 5-gas monitors for regulatory personnel to use	3/22/2024; ongoing	Ongoing
52	Host meetings between South Coast AQMD technical staff and Chiquita's technical consultants	1/18/2024; biweekly	Ongoing
53	Submit report on leachate tank numbers and quantities of liquid collected and treated	4/3/2024; weekly	Ongoing; posted on Chiquita's website
54	Collect, convey, and store flare condensate separate from leachate; no mixing of flare condensate and leachate	3/22/2024; ongoing	Ongoing
65	Provide South Coast AQMD with a summary of leachate dewatering pump installation activities	3/29/2024; weekly	Ongoing; posted on Chiquita's website

Condition No.	Key Action	Start Date/Deadline	Status
72(d)	Conduct pressure testing and monitoring within the HDPE headers venting the leachate tanks until pressure gauges are installed	4/29/2024; daily	Ongoing; see Condition 8 monthly reports

#### Future Actions

Condition No.	Key Action	Start Date/Deadline	Status
12(i)	Submit report on second flux chamber study	6/3/2024	
68	Install pressure gauges on each leachate tank	6/15/2024	
68	Monitor and record the differential pressure of each leachate tank, tank identification number, date and time of the reading, and personnel	6/15/2024; daily	
58	Submit expedited permit modification application for Zeeco TOX	6/21/2024	
59	Submit expedited permit modification application for Landfill Gas Condensate and Leachate Treatment System for hazardous waste treatment	6/21/2024	
66	Finalize contracts to install and operate remote well pressure and temperature monitoring system	6/21/2024	
12(g)(viii)	Conduct an investigation into piping materials and submit a report on the existing and future planned piping, including a recommendation of appropriate piping materials and replacement of existing piping materials	6/21/2024	
12(g)(vii)	Develop a model to estimate the rate of liquid generation in the landfill and total quantity of liquid existing within the landfill waste mass at any given time and submit a report summarizing the model and results of the modeling	6/25/2024	

Condition No.	Key Action	Start Date/Deadline	Status
70	Submit a report on current and projected landfill gas generation and flaring capacity	6/28/2024	
73	Submit a permit application for internal combustion engine equipment rated greater than 50 HP that is not already permitted through SCAQMD	6/30/2024	
73	Submit a permit application for any internal combustion engine equipment rated greater than 50 HP brought onsite that does not already have a valid SCAQMD permit or for which a permit application was not submitted prior to 6/30/2024	6/30/2024; ongoing	
15(b)(i)	Install 50% of wells necessary to achieve well installation density	7/1/2024	
72(e)	Install flow meters within the HDPE piping headers for the leachate tanks	7/19/2024	
72(e)	Record flow rate and total daily volume of leachate tank vapors vented to the flare station	7/19/2024; daily	
69	Inspect and monitor piping materials for buckling, rupturing, cracking, melting, liquid leaks, or other structural concerns; record monitoring activity and work performed to resolve any issues	7/19/2024; quarterly	
12(g)(vi)	Prepare and submit to South Coast AQMD a report of the health impacts from ongoing and long-term exposure to H <sub>2</sub> S or other speciated sulfur compounds and other HAPs	8/1/2024	
32(c)	Submit final report on additional air modeling study	9/2/2024 or 90 days after South Coast AQMD approval of proposal, whichever is later	
15(b)(ii)	Install 75% of wells necessary to achieve well installation density	10/1/2024	
66	Install and operate remote well pressure and temperature monitoring system	10/22/2024	
15(b)	Install additional gas wells to achieve a vertical well density of an average of three operational wells per acre with at least two wells per acre	1/6/2025	



Condition No.	Key Action	Start Date/Deadline	Status
70	Submit a complete permit application for the construction of new combustion/control equipment	1/7/2025	
69	Submit a recommendation as to modifying the frequency of piping monitoring	7/31/2025	
15(d)	Notify South Coast AQMD at least 1 week in advance when an additional well or set of wells and associated piping will be installed	Following installation of Condition 15(a) and (b) wells	
15(d)	Provide updates to the design and schedule for the additional wells	Following installation of Condition 15(a) and (b) wells	
15(j)	Replace any wells in the Reaction Area which are damaged, blocked, pinched, or have temps exceeding 145 degrees F	Following installation of Condition 15(a) and (b) wells; as needed	
15(j)	Notify South Coast AQMD of proposed installation schedule for replacement of damaged, blocked, pinched, or high temp wells	Following installation of Condition 15(a) and (b) wells; within 7 days of discovery	
15(j)	Install replacement well within 7 days of notification; update South Coast AQMD every 7 days until installation is complete	Following installation of Condition 15(a) and (b) wells; within 7 days of notification	
50	Submit monthly progress reports submitted to EPA under the UAO to South Coast AQMD	After EPA's approval of the Master Work Plan	
55	If injection of flare condensate begins, maintain and submit records of condensate sampling/analysis and injection flows	If injection of flare condensate begins; monthly	
15(k)	Operate gas extraction wells with less than 3% oxygen and follow BMPs to keep oxygen below 5% in interior wells	Once additional/adequate gas extraction capacity is installed	
4	Once Flare 4 is in operation, prioritize Flare 3 and Flare 4 over Flare 1 and Flare 2	Once Flare 4 is in operation	
55	Conduct source testing and obtain South Coast AQMD approval prior to injection of flare condensate	Prior to injection of flare condensate	
12	Provide new Reaction Committee member information to South Coast AQMD	As needed	

Condition No.	Key Action	Start Date/Deadline	Status
15(m)	Submit semi-annual as-built drawings in duplicate to South Coast AQMD	Semi-annually	
34(c)	Third party must put automatic electronic notification system for the community air monitoring into effect	Within 3 business days of direction from South Coast AQMD	
72(b)	Conduct source testing for vapor flow testing	Within 45 days of South Coast AQMD approval of protocol	
72(b)	Submit final source test report for vapor flow testing	Within 30 days of testing	
72(a)	Sample and analyze vapor flow in the piping used to vent the leachate tanks; submit results in monthly Condition 8 reports	Upon completion of source testing; quarterly	
72(c)	Submit a recommendation on additional vapor flow testing	Within 30 days of submission of the source test report	
34	Provide South Coast AQMD access to all real-time continuous monitoring data for TRS and TAC at enhanced monitors	Within 5 calendar days after enhanced monitors are brought online	
18	Implement revised dewatering guidelines to the maximum extent feasible	Within 7 days of approval of revised guidelines	

## Attachment C

### LEA Mitigation Measures

<b>Mitigation Measure #</b>	<b>Key Action</b>	<b>Start Date/Deadline</b>	<b>Status</b>
1A	Develop a soil reaction break/barrier plan and a set of criteria that would require Chiquita to install a soil reaction break/barrier between the reaction and operational areas of the landfill.	June 15	In progress
1B	Install temperature monitoring devices in the reaction area.	Completed; see weekly updates and related reports on Chiquita's website	Completed
1B <sup>1</sup>	Submit final construction report for the installation of the temperature monitoring probes.	May 5, 2024	Completed
1B	Collect and analyze weekly temperature readings; submit a weekly discussion and temperature graph of all probes.	April 30, 2024; ongoing	Ongoing; weekly reports are posted on Chiquita's website
2A	Develop and submit a revised updated installation schedule for 30-mil geosynthetic cover.	May 14, 2024	Completed
2A	Install 30-mil geosynthetic cover over the Reaction Settlement Area and any well showing signs of a reaction.	July 12, 2024	In progress; see weekly updates and related reports on Chiquita's website
2B	Develop a written plan for documenting and tracking issues in the soil cover for LEA review and approval.	December 6, 2023	Completed
2B	Revise written plan for documenting and tracking issues in the soil cover to include documenting and tracking issues related to the geosynthetic cover and actions taken to address any identified issues.	December 21, 2023	Completed
2B	Revise written plan for documenting and tracking cover issues to include a log with a summary and map to track documented fissures and tension cracks and identify trends, and to include methods to track instability obscured by the geosynthetic cover.	Completed	Completed

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<sup>1</sup> Please note that Chiquita received correspondence from the LEA on Mitigation Measure #s 1B and 2B on May 29, 2024 that is not yet incorporated into this chart as Chiquita continues to evaluate and discuss with the LEA.

2B	Upon LEA approval of the written plan, submit a weekly report to the LEA by each Tuesday.	Ongoing	Ongoing; see weekly reports on Chiquita's website
3	Submit a work plan for a slope stability analysis in the area of the western slope of the reaction area with a timeline for LEA review and approval.	December 14, 2023	Completed
3	Perform a slope stability analysis in the area of the western slope of the reaction area.	February 22, 2024	Completed
3	Perform additional slope stability analyses as enumerated in the LEA's March 22, 2024 letter to Chiquita.	In progress	In progress; draft submitted to LEA
4	Collect temperatures in and around the reaction area to meet the manufacturer's temperature design specifications/recommendations of equipment in the area.	April 30, 2024; ongoing	Ongoing

## Attachment D

### Work Required by EPA UAO

#### Completed Work

Paragraph #	Key Action	Start Date/Deadline	Status
94	Request a conference with EPA to discuss UAO or notify EPA that Chiquita intends to submit written comments or a statement of position in lieu of requesting a conference.	February 23, 2024	Completed
98	Notify EPA of Chiquita's intent to comply with UAO.	February 26, 2024	Completed
18	Designate a Project Coordinator responsible for administration of Work under UAO.	February 28, 2024	Completed
6	Provide a copy of UAO to all contractors, subcontractors, laboratories, and consultants that are retained to conduct or monitor any portion of the Work performed pursuant to UAO.	March 4, 2024	Completed
25	Develop and submit a Health and Safety Plan.	March 21, 2024	Completed
17	Notify EPA of the names, contact info, and qualifications of the contractors, subcontractors, consultants, and laboratories to be used in carrying out the Work.	March 27, 2024	Completed
76-79	Submit initial cost estimates.	April 26, 2024	Completed
22(c)(1)	Submit revised Leachate Management Plan (part of Master Work Plan).	May 4, 2024	Completed
22(c)(6)	Submit revised Air Monitoring Plan (part of Master Work Plan).	May 7, 2024; updated May 17, 2024	Completed

#### Ongoing Work

Paragraph #	Key Action	Start Date/Deadline	Status
6	Condition all contracts and agreements with contractors, subcontractors, laboratories, or consultants in connection with the UAO, on compliance with terms of the UAO. Ensure their compliance with UAO.	Ongoing	Ongoing
17	Submit a copy of each proposed contractor's QMP and demonstrate their compliance with ASQ/ANSI E4:2014.	Ongoing; extension requested	Ongoing
17	Notify EPA of any additional retained contractors or subcontractors.	At least 5 days prior to commencement of Work	As needed; ongoing
22(a)	Immediately store, transport leachate solid and/or hazardous waste in	February 26, 2024; ongoing	Ongoing

Paragraph #	Key Action	Start Date/Deadline	Status
	accordance with RCRA, 42 U.S.C. 6900, et seq., and associated regulations. All hazardous waste shall be disposed of at a TSD preapproved by EPA.		
22(b), (c)	Provide a Master Work Plan subject to EPA's approval, including the following plans: -Leachate Management Plan -Soil Reaction Break/Barrier Plan -Cover Installation Plan -Slope Stability Analysis work plan -Collection of temperature data in/around Reaction Area -Air Monitoring Plan -Off-Site Migration Prevention Plan	March 27, 2024	Submitted Plan; updating components of the Plan in response to EPA comments
22(c)(6)	Submit revised Air Monitoring Plan (part of Master Work Plan).	May 17, 2024	Submitted revised Plan; updating components of the Plan in response to EPA comments
24	Submit a Sampling and Analysis Plan subject to EPA's approval, including a Field Sampling Plan and Quality Assurance Project Plan.	March 27, 2024	Submitted Plan for EPA's approval
28	Prior to shipping hazardous substances, pollutants, or contaminants off site, obtain a prior determination from EPA and comply with RCRA and CERCLA requirements.	Prior to shipping hazardous substances, pollutants, or contaminants off site	As needed; ongoing
28	Provide written notice of out-of-state waste shipments to the appropriate state environmental official and to EPA. Notify state official and EPA of any major changes in shipment plan.	Prior to shipping waste material out of state	As needed; ongoing
28	Comply with the requirements of Paragraph 28(c) regarding shipment of Investigation Derived Waste off site.	Prior to shipping Investigation Derived Waste off-site	As needed; ongoing
39	Take all appropriate action to minimize emergency/threat.	In the event of an emergency or an action or occurrence that may present an immediate threat to human health and the environment	As needed; ongoing



Paragraph #	Key Action	Start Date/Deadline	Status
39	Submit written notification of emergency/threat.	Within 3 days of discovery	As needed; ongoing
39	Submit and implement a plan to mitigate threat.	As needed	As needed; ongoing
40	Provide notification of a release that triggers release notification pursuant to CERCLA Section 103 or EPCRA Section 304 pursuant to Paragraph 40.	In the event of a release that triggers release notification pursuant to CERCLA or EPCRA	As needed; ongoing
41, 42	Use quality assurance, quality control, and other technical activities and chain of custody procedures for all samples. Ensure all laboratories meet the requirements of Paragraph 42 of the UAO.	Ongoing	Ongoing
49	All results of sampling, testing, modeling, or other data generated by Chiquita, or on Chiquita's behalf, must be validated by Chiquita and submitted to EPA promptly upon receipt.	Upon receipt of results	Ongoing
50	Notify EPA in advance of any sample collection activity.	Not less than 7 days prior to any sampling	Ongoing
59-62	Preserve all documents/information, including raw data, relating to the Work, or relating to any solid waste or hazardous waste found at the Site, for 5 years following termination of UAO.	February 26, 2024; ongoing	Ongoing
59-62	Acquire and retain copies of all documents that related to the Site that are in possession of Chiquita employees, agents, accountants, contractors, or attorneys.	February 26, 2024; ongoing	Ongoing
73	Secure insurance as required by the UAO. Provide EPA with certificates of such insurance and a copy of each insurance policy, naming EPA as an additional insured, prior to commencing Work and annually thereafter on February 26.	Ongoing/prior to commencing Work; annually	Ongoing
73, 75	Ensure that Chiquita and its contractors and subcontractors satisfy all applicable laws and regulations regarding the provision of employer's liability insurance and worker's compensation insurance for all persons performing Work.	February 26, 2024; ongoing	Ongoing

Paragraph #	Key Action	Start Date/Deadline	Status
73, 75	Certify to EPA that Chiquita's contractors and subcontractors have obtained the required insurance.	Ongoing/prior to commencing Work	Ongoing
88	Notify EPA Project Coordinators of any delay or anticipated delay in performing any requirement of the UAO	Within 48 hours after Chiquita first knew or should have known of a delay	As needed; ongoing
88	Provide written notification of delay in accordance with Paragraph 88	Within 7 days after notifying EPA of delay	As needed; ongoing

#### Future Work

Paragraph #	Key Action	Start Date/Deadline	Status
22(c)(2)	Submit revised Soil Reaction Break/Barrier Plan (part of Master Work Plan).	June 15, 2024	
80-86	Secure financial assurance and submit proposed financial assurance mechanisms.	Within 30 days of EPA approval of cost estimates	
80-86	Secure and submit all executed/finalized financial assurance mechanisms.	April 26, 2024, or 30 days after approval of financial assurance, whichever is later	
26	Submit monthly progress reports on actions undertaken pursuant to the UAO.	Monthly, concerning work undertaken pursuant to UAO from date of receipt of EPA approval of Master Work Plan	
53	Use best efforts to obtain all necessary access agreements.	As needed	
76-79	Submit revised cost estimates.	Annually and as needed	
80-86	Revise financial assurance and financial assurance mechanisms.	As needed	
27	Submit a final report summarizing actions taken to comply with UAO.	Within 15 days after completion of all Work required by UAO	
59-62	Notify EPA that documents and information are available for inspection and provide copies upon request.	After the end of the 5-year retention period and 90 days before any documents or information is destroyed	

## Attachment E

**BEFORE THE HEARING BOARD OF THE  
SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT**

**In The Matter Of**

**Case No. 6177-4**

SOUTH COAST AIR QUALITY  
MANAGEMENT DISTRICT,

Petitioner,

vs.

CHIQUITA CANYON, LLC a Delaware  
Corporation,  
[Facility ID No. 119219]

Respondent.

**FINDINGS AND DECISION FOR A  
MODIFIED STIPULATED ORDER FOR  
ABATEMENT**

Health and Safety Code § 41700, and District  
Rules 402, 431.1, 3002, 203,  
1150 \_\_\_\_\_

Hearing Date: March 21, 2024  
Time: 9:00 am  
Place: Hearing Board  
South Coast Air Quality  
Management District  
21865 Copley Drive  
Diamond Bar, CA 91765

On March 21, 2024, following petition from Respondent, a hearing to consider modifications to the Stipulated Order for Abatement was held pursuant to notice in accordance with the provisions of California Health and Safety Code §§ 40823 and 42451(a) and District Rule 812. The following members of the Hearing Board were present: Cynthia Verdugo-Peralta, Chair; Robert Pearman, Esq., Vice Chair; Jerry P. Abraham, MD MPH CMQ; Micah Ali; and Mohan Balagopalan. Petitioner South Coast Air Quality Management District ("South Coast AQMD") was represented by Kathryn Roberts, Senior Deputy District Counsel, Mary Reichert, Senior Deputy District Counsel and Ryan Mansell, Senior Deputy District Counsel. Respondent Chiquita Canyon, LLC, was represented by Jacob P. Duginski, attorney at law, Megan L. Morgan, attorney at law, and Leigh S. Barton, attorney at law, of Beveridge & Diamond, P.C. South Coast AQMD and Respondent presented a stipulation on proposed modifications. The declarations of Srividhya Viswanathan and Patrick Sullivan, BCES, CPP, REPA, were received as evidence from Respondent. Exhibits marked as Nos. 43 through 51 were received as evidence from South Coast AQMD. Written materials submitted by the public were received as evidence. Ms. Viswanathan and Mr. Sullivan testified for the Respondent. Mr. Baitong

1 Chen, Air Quality Engineer I, and Ms. Christina Ojeda, Air Quality Inspector I, testified for the  
2 South Coast AQMD. The public was given the opportunity to testify, evidence was received, and  
3 the matter was submitted. The Hearing Board finds and decides as follows:

4 **FINDINGS OF FACT**

5 1. South Coast AQMD is a body corporate and politic established and existing pursuant  
6 to Health and Safety Code §§ 40000, *et seq.* and §§ 40400, *et seq.*, and is the sole and exclusive local  
7 agency with the responsibility for comprehensive air pollution control in the South Coast Basin.

8 2. Respondent operates a landfill/solid waste disposal facility known as Chiquita  
9 Canyon Landfill ("CCL") located at 29201 Henry Mayo Dr., Castaic, California, 91384, South Coast  
10 AQMD Facility ID No. 119219. Respondent operates within the South Coast AQMD's jurisdiction  
11 and is subject to the South Coast AQMD's rules. The landfill/solid waste disposal site has a footprint  
12 of approximately 400 acres pursuant to a Conditional Use Permit issued by the County of Los  
13 Angeles. Chiquita was most recently granted a renewed Conditional Use Permit in 2017 to allow  
14 continued operations. Under its current use permit, CCL is allowed to accept an average of 6,616  
15 tons per day ("TPD") of solid waste between the hours of 4:00am to 5:00pm Monday through  
16 Saturday. CCL may also accept green waste and beneficial reuse materials. CCL may accept a  
17 maximum of 2,800,000 tons per year of solid waste and beneficial reuse material combined.

18 3. **South Coast AQMD Rule 402 and California Health and Safety Code ("H&S**  
19 **Code") Section 41700** prohibit the discharge, from any source whatsoever, such quantities of air  
20 contaminants or other material which causes injury, detriment, nuisance, or annoyance to any  
21 considerable number of persons or the public, or which cause, or have the natural tendency to cause,  
22 injury or damage to business or property.

23 4. **South Coast AQMD Rule 102 and H&S Code Section 39013** define "air  
24 contaminant," including as used in Rule 402 and Section 41700, as "any discharge, release, or other  
25 propagation into the atmosphere directly or indirectly caused by man and includes, but is not limited  
26 to, smoke, charred paper, dust, soot, grime, carbon, fumes, gases, odors, particulate matters, acids or  
27 any combination thereof."

28 5. **South Coast AQMD Rule 431.1(c)(2)** prohibits burning, in any equipment requiring



1 a permit to operate, landfill gas with sulfur compounds of greater than 150 parts per million by  
2 volume ("ppmv") calculated as hydrogen sulfide ("H<sub>2</sub>S") averaged daily.

3 6. **South Coast AQMD Rule 3002(c)(1)** requires operators to operate all Title V  
4 facilities in compliance with all Title V permit conditions at all times.

5 7. **South Coast AQMD Rule 203(b)** requires all facilities to operate in compliance with  
6 all conditions in their permit to operate.

7 8. **South Coast AQMD Rule 1150(b)(2)** requires all persons to obtain an Excavation  
8 Management Plan approved by the South Coast AQMD prior to initiating excavation of an active or  
9 inactive landfill unless the activity which exposes buried waste to the atmosphere is a normal part  
10 of the daily operation of an active landfill or is exempted by South Coast AQMD Rule 1150(c),  
11 which includes exemption for the maintenance of gas or leachate collection systems and emergency  
12 excavations performed by, under the jurisdiction of, or pursuant to the requirements of, an authorized  
13 Health Officer, Agricultural Commissioner, or Fire Protection Officer and whenever possible, the  
14 Executive Officer shall be notified prior to commencing such excavation.

15 9. **CCL's Facility-Wide Permit, Condition No. 3** prohibits CCL from using landfill  
16 gas that contains sulfur compounds in excess of 150 ppmv calculated as H<sub>2</sub>S averaged daily.

17 10. **South Coast AQMD Permit No. G55163, Condition No. 11** requires CCL to have  
18 no more than 150 ppmv of total sulfur compounds (calculated as H<sub>2</sub>S averaged daily) in its landfill  
19 gas.

20 11. **South Coast AQMD Permit No. G73696, Condition No. 16** limits CCL's Flare No.  
21 1 to a maximum of 2.5 lbs/hour of sulfur oxides ("SO<sub>x</sub>") as SO<sub>2</sub>.

22 12. **South Coast AQMD Permit No. G73696, Condition No. 17** limits CCL's Flare No.  
23 2 to a maximum of 2.5 lbs/hour of SO<sub>x</sub> as SO<sub>2</sub>.

24 13. **South Coast AQMD Permit No. A/N 624296, Condition No. 31** limits CCL's Flare  
25 No. 3 to a maximum of 124.08 lbs/day and 2,175.60 lbs/month of SO<sub>x</sub> as SO<sub>2</sub>. Flare No. 3 is also  
26 limited by its permit to a daily average in the inlet of 85 ppmv sulfur as H<sub>2</sub>S, and monthly average  
27 of 60 ppmv sulfur as H<sub>2</sub>S, and a daily average in the inlet of 150 ppm sulfur as H<sub>2</sub>S

28 14. Respondent's operation at CCL also includes a landfill gas collection and control

1 system that includes vertical and horizontal gas collection wells and associated piping and trenches,  
2 multiple collection headers and blowers for venting landfill gas, a landfill gas treatment system, a  
3 condensate/leachate collection system and three flares which combust landfill gas. CCL also has an  
4 active permit application for an additional fourth flare which, if permitted, would be incorporated  
5 into its landfill gas collection and control system.

6 15. South Coast AQMD alleges Respondent is inadequately containing landfill gas,  
7 leachate, and associated surface emissions at CCL, which cause odor and other unlawful emissions  
8 from the landfill.

9 16. From January to September 2023, South Coast AQMD received more than 2,100  
10 complaints of an odor nuisance from the public, with CCL as the alleged source. Complaints include  
11 odor descriptions of both trash and landfill gas, but Petitioner and Respondent believe that all odors  
12 complained of related to landfill gas, leachate, and associated surface emissions rather than trash or  
13 the working face.

14 17. CCL is currently experiencing a subsurface reaction or elevated temperature landfill  
15 event over an inactive portion of the landfill that is causing increased temperatures, increased  
16 production of landfill gas, and increased production of leachate, as well as fugitive emissions of  
17 landfill gas from the surface of the landfill. The area of the landfill affected by the reaction is located  
18 in the northwest corner of the Landfill between approximately 1000 feet and 1500 feet from the  
19 nearest resident. South Coast AQMD alleges that the ongoing subsurface reaction is the source of  
20 the odor complaints received from the public, and the root cause of an ongoing public nuisance.

21 18. South Coast AQMD Inspectors investigated the complaints and traced some of them  
22 back to CCL and confirmed CCL as the source of the odors on numerous occasions, and have  
23 consistently traced odors back to the area of the landfill affected by the reaction rather than the  
24 working face. Between May and September 5, 2023, South Coast AQMD issued 58 Notices of  
25 Violation (“NOVs”) against Respondent for violating South Coast AQMD Rule 402 and H&S Code  
26 § 41700.

27 19. On September 6, 2023, the Hearing Board held a hearing on South Coast AQMD’s  
28 Petition for an Order for Abatement. At the conclusion of the hearing, the Hearing Board issued a



1 Stipulated Order for Abatement ("Stipulated Order").

2 20. Following adoption of the Stipulated Order, South Coast AQMD learned that CCL  
3 was experiencing leachate seeps, where leachate would be exposed at the landfill surface and to the  
4 ambient air rather than being collected subsurface via Respondent's leachate collection system. To  
5 address this and related issues which were not covered in the Stipulated Order, South Coast AQMD  
6 petitioned for a status modification hearing on November 3, 2023. A hearing was initially set on  
7 December 12, 2023. The hearing was continued to January 9, 2024. The Parties later stipulated to  
8 combine the continued modification hearing with the pre-set status hearing on January 16, 2024.

9 21. Following the adoption of the Stipulated Order, Respondent worked to implement the  
10 Order's conditions. Respondent presented summaries of its implementation of these conditions in  
11 declarations submitted on December 1, 2023, January 9, 2024, and January 11, 2024.

12 22. Between September 6, 2023 and January 11, 2024, South Coast AQMD received a  
13 total of 4860 complaints alleging CCL as the source of odors. South Coast AQMD consistently  
14 responds to and investigates complaints, including verifying the existence of complained-of odors  
15 and the source as CCL. Over this time period, Respondent received 47 NOVs for alleged violations  
16 of South Coast AQMD Rule 402 and H&S Code § 41700. The total number of NOVs issued for  
17 alleged violations of South Coast AQMD Rule 402 and H&S Code § 41700 related to this incident  
18 is 107 as of January 17, 2024.

19 23. Prior to the close of the hearing on January 17, 2024, the Parties jointly submitted a  
20 set of stipulated proposed modifications to the Stipulated Order. At the close of the hearing on  
21 January 17, 2024, the Hearing Board issued a modified Stipulated Order.

22 24. On February 15, 2024, pursuant to Condition 49 of the Stipulated Order, Respondent  
23 notified South Coast AQMD of a potential conflict between various provisions of the Stipulated  
24 Order related to dewatering and requirements of the Department of Toxic Substances Control. More  
25 specifically, recent samples of Respondent's leachate exceeded regulatory thresholds for benzene  
26 and/or other potentially hazardous constituents. As a result of these elevated constituents,  
27 Respondent could not send this material to its traditional disposal outlets because those outlets were  
28 not authorized to accept it. Respondent was forced to shut off some of its leachate collection pumps



1 that would otherwise direct this material to the onsite leachate accumulation tanks because those  
2 tanks were running out of capacity. This situation presented a potential conflict with various  
3 conditions of the Stipulated Order that require Respondent to remove and dispose of its leachate.  
4 Because Respondent could not bring all of its leachate collection pumps back online, or dispose of  
5 all of the accumulated leachate, within the three working days allotted by Condition 49 to resolve  
6 this conflict, Respondent petitioned for a modification hearing on February 21, 2024. A hearing was  
7 set for March 21, 2024. Respondent submitted two declarations in support of its proposed  
8 modifications on March 19, 2024.

9 25. The parties jointly submitted a set of stipulated proposed modifications ahead of the  
10 March 21, 2024 hearing to address dewatering and other requirements in the Stipulated Order in  
11 light of potentially conflicting requirements from another regulatory agency and the accumulation  
12 and management of leachate at the Chiquita Canyon Landfill.

### 13 CONCLUSIONS

14 1. The Modified Stipulated Order for Abatement set forth hereinafter is likely to  
15 mitigate conditions that could contribute to potential odors and potential nuisance.

16 2. The issuance of this Modified Stipulated Order for Abatement upon a fully noticed  
17 hearing would not constitute a taking of property without due process of law.

18 3. There is good cause for adopting the modifications of the Order as stipulated to by  
19 the Parties.

20 4. This Modified Stipulated Order for Abatement is not intended to be nor does it act as  
21 a variance.

### 22 ORDER

23 THEREFORE, subject to the aforesaid statements and good cause appearing, the Hearing  
24 Board hereby orders Respondent to comply with California Health and Safety Code Section 41700,  
25 South Coast AQMD Rules 402, 203, 431.1, and 3002, and all conditions of Respondents Permits.  
26 The Hearing Board further hereby orders Respondent to comply with the following conditions and  
27 increments of progress:

#### 28 **Odor Surveillance**

1. Respondent shall conduct odor surveillance in the communities surrounding CCL as follows:

- a. Respondent shall contract with a trained third party to conduct odor surveillance each operating day within thirty (30) days after the issuance of the September 6, 2023 Order (the "Initial Order"). Respondent shall conduct odor surveillance each operating day until the trained third party has been contracted. Respondent, or Respondent's contractor, as applicable, shall conduct community odor surveillance at least twice each operating day, once between the hours of 7:00 a.m. and 11:00 a.m. and once between the hours of 8:00 p.m. and 12:00 a.m. If a three-week period passes without Respondent receiving a Rule 402 NOV from the South Coast AQMD, or detecting odors at above an intensity of 2 at more than 2 stops during a single surveillance, then Respondent, or Respondent's contractor, as applicable, may stop conducting the odor surveillances. If Respondent, or Respondent's contractor, as applicable, has stopped conducting the odor surveillances pursuant to this condition and Respondent subsequently receives a Rule 402 NOV from the South Coast AQMD, then Respondent, or Respondent's contractor, as applicable, must resume conducting the odor surveillances until another three-week period passes with no Rule 402 NOVs issued by the South Coast AQMD, or without Respondent or Respondent's contractor, as applicable, detecting odors at above an intensity of 2 at more than 2 stops in a single surveillance.
- b. Respondent, or Respondent's contractor, as applicable, shall conduct an odor surveillance at each of the following Surveillance Locations:

Stop	Description
1.	Intersection of Chiquito Canyon Road and driveway leading to the LA County Fire's Del Valle Regional Training Center
2.	Intersection of Chiquito Canyon Road and Lincoln Avenue
3.	Intersection of Lincoln Avenue and Jackson Street
4.	Intersection of Lincoln Avenue and Harding Avenue



Stop	Description
5.	Intersection of Buchanan Way and Chiquito Canyon Road
6.	Intersection of Chiquito Canyon Road and San Martinez Road
7.	Intersection of San Martinez Road and Morningside Drive
8.	Intersection of Lexington Drive and Morningside Drive
9.	Intersection of Val Verde Road and Trellis Road
10.	Intersection of San Martinez Road and Euclid Ave.
11.	Intersection of San Martinez Road and Kenningston Road
12.	Intersection of Hunstock Street and Windsor Road
13.	Intersection of Del Valle Road and Silver Street
14.	Intersection of Del Valle Road and Hasley Canyon Road
15.	Intersection of Hasley Canyon Road and Gibraltar Lane
16.	Intersection of Gibraltar Lane and Alton Way
17.	Intersection of Gibraltar Lane and Springvale Lane
18.	Intersection of Castlebury Place and Picadilly Place
19.	Intersection of Gibraltar Lane and Cambridge Avenue
20.	Intersection of Cambridge Avenue and Hasley Canyon Road
21.	Intersection of Creekbed Road and Firebrand Drive
22.	Intersection of The Old Road and Hillcrest Parkway
23.	Intersection of Hillcrest Parkway and Park Vista Drive at Castaic Elementary School
24.	Intersection of Hasley Canyon Road and Commerce Center Drive (Santa Clarita Valley International School & PlayMakers Preschool)
25.	Intersection of The Old Road and Live Oak Road
26.	Intersection of Live Oak Road and Hidden Trail Road
27.	Intersection of Rangewood Road and Buckskin Drive
28.	Intersection of Live Oak Elementary School at Saddleridge Way
29.	Intersection of Quincy Street and Cambridge Avenue
30.	Intersection of Commerce Center Drive and Witherspoon Parkway
31.	Intersection of Franklin Parkway and driveway leading to the United States Postal Service
32.	Intersection of Henry Mayo Drive and Cambridge View Drive, leading into the Valencia Travel Village RV Resort

- c. Respondent, or Respondent's contractor, as applicable, conducting the odor surveillance shall not have visited the Reaction Area (as defined in Condition 9(a)), working face, or other areas where exposed trash or landfill gas odors exist at CCL within four hours prior to conducting an odor surveillance.



- 1 d. Odor surveillance shall be conducted by proceeding to each Surveillance Location  
2 and making an assessment of each parameter listed in Condition No. 1(e).  
3 Assessment of each parameter shall be made while standing in ambient air and shall  
4 not be made from within a vehicle.
- 5 e. Respondent, or Respondent's contractor, as applicable, shall record odor  
6 surveillance results in an "Odor Surveillance Log" before the end of the work day.  
7 The Odor Surveillance Log shall contain, but not be limited to: (1) the date and time;  
8 (2) stop number; (3) the name of the person performing the surveillance and written  
9 acknowledgement that they did not visit the working face or other on-site areas  
10 where exposed trash or landfill odors such as, but not limited to landfill gas odors,  
11 refuse or refuse contaminated material odors, or landfill liquids/landfill leachate  
12 odors exist within a four hours prior to conducting an odor surveillance, (4) the wind  
13 speed and direction; (5) a narrative description of any odor detected (including the  
14 type of odor, such as trash, landfill gas, chemical, odor neutralizer, as applicable);  
15 (6) current weather conditions; and (7) an assessment of the strength of any odor  
16 detected using the scale below:

17

0	No odor detected
1	Very light odor detected
2	Light odor detected
3	Moderate odor
4	Strong odor
5	Very strong odor

18  
19  
20

- 21 f. If Respondent, or Respondent's contractor, as applicable, conducting the odor  
22 surveillance detects odors at three or more stops that are determined to be of a  
23 strength of 3 or higher on the scale above during any surveillance occurring during  
24 Respondent's operating hours (between the hours of 4:00am and 5:00pm),  
25 Respondent, or Respondent's contractor, as applicable, shall immediately notify  
26 landfill operating staff. Respondent shall designate an employee able to receive and  
27 direct action related to such notifications promptly. Upon receiving such  
28 notification, Respondent shall, within 30 minutes of receipt, review and initiate

modifications, as appropriate, to fan placement, and conduct a visual inspection of the Reaction Area (as defined in Condition 9(a)) to assess, and address as needed, any cracks in the surface of the area.

2. Respondent shall maintain records of all Odor Surveillance Logs for the duration of this Order and shall make them available for inspection by South Coast AQMD upon request. Respondent shall maintain a written record of any notification received, and any action taken in response to notice under Condition 1(f).

#### **Reducing Sulfur in the Landfill Gas to be Flared**

3. Respondent shall expedite, to the maximum extent feasible, replacement of granular activated carbon media in the Landfill Gas Treatment System (under Permit G55163, A/N 603249), including the execution of contracts, as well as the delivery, replacement, startup, and testing of any operation necessary to replenish and/or replace spent granular activated carbon media in the Landfill Gas Treatment System. Respondent shall ensure adequate stock of all odor control products and supplies are maintained on site.
  - a. Respondent shall monitor and record the landfill gas temperature at least daily at the inlet of the Landfill Gas Treatment System. The temperature of the landfill gas shall not exceed 145 F.
4. Respondent shall maximize landfill gas combustion utilizing all operational flares (excepting periods of maintenance, breakdowns, or automatic shutdown) to limit release of raw landfill gas. Respondent shall prioritize and maximize the use and operation of landfill gas flares No. 2 (under Permit G73696, A/N 645450) and No. 3 (under A/N 624296) over landfill gas flare No. 1 (under Permit G73696, A/N 645450) to the maximum extent feasible when combusting landfill gas at the facility (FID 119219). Once Respondent receives the necessary permits and puts the new landfill gas flare discussed in Condition 21 ("landfill gas flare No. 4") into operation, Respondent shall prioritize and maximize the use and operation of landfill gas flares Nos. 3 and 4 over landfill gas flares No. 1 and No. 2 (under Permit G73696, A/N 645450) and prioritize and maximize the use and operation of landfill



1 gas flare No. 2 over landfill gas flare No. 1 to the maximum extent feasible when  
2 combusting landfill gas at the facility (FID 119219).

3 5. Respondent shall sample, analyze, and record the landfill gas sulfur compounds combusted  
4 in each flare (as measured at sampling location FL-150 that is representative of the gas  
5 combusted in the flares under Permit G73696, A/N 45450; A/N 624296), in the thermal  
6 oxidizer/flare, and in any other landfill gas control equipment operating on site at least once  
7 each week using colorimetric tests for H<sub>2</sub>S and at least once each day sample for analysis  
8 for total sulfur compounds as H<sub>2</sub>S using South Coast AQMD Method 307-91. Additionally,  
9 Respondent shall sample, analyze, and record the landfill gas sulfur compounds and  
10 speciated organic compounds found in the raw, pre-treatment and pre-control, landfill gas  
11 collected from the Reaction Area (as defined in Condition 9(a)) at least once each calendar  
12 month for total sulfur compounds as H<sub>2</sub>S using South Coast AQMD Method 307-91 and  
13 for speciated organic compounds using U.S. Environmental Protection Agency (EPA)  
14 Method TO-15.

15 a. Respondent shall record South Coast AQMD Method 307-91 analysis upon receipt  
16 of laboratory analysis report. Each recorded measurement or result shall be  
17 documented with the time and date when the measurement or sample collection was  
18 conducted, and initialed by the personnel that conducted the measurement or sample  
19 collection.

20 b. Sulfur compound readings and analysis shall be reported to South Coast AQMD  
21 pursuant to Condition No. 8.

22 i. Tedlar bags used for Method 307-91 sampling and analysis shall not contain  
23 droplets or debris.

24 ii. Colorimetric tube readings shall be conducted by taking a reading from a  
25 Tedlar bag sample using an appropriate colorimetric tube sample collection  
26 pump. All sampling shall be performed in accordance with the operational  
27 manual for the colorimetric tube sample collection pump.  
28

- 1                   iii. Colorimetric tube readings shall use colorimetric tubes of appropriate  
2 concentration range and shall be reported as follows:
- 3                   1. Respondent shall first use the estimated appropriately ranged colorimetric  
4 tube.
- 5                   2. If the resulting reading reaches the upper concentration of the colorimetric  
6 tube concentration range, subsequent reading(s) shall be taken using a  
7 colorimetric tube with a concentration range that has a larger upper  
8 concentration threshold until the result is not the upper concentration  
9 threshold of the concentration range. Report the tube concentration range  
10 and tube concentration result for each reading.
- 11                  3. If the reading results in the lower concentration of the colorimetric tube  
12 concentration range or does not register a result, subsequent reading(s)  
13 shall be taken using a colorimetric tube with a concentration range that has  
14 a smaller lower concentration threshold, if available, until the colorimetric  
15 tubes available to the facility result in:
- 16                   a. A reading that is within the concentration range of the tube,  
17                   b. A reading is the lower concentration of the colorimetric tube  
18 concentration range, or  
19                   c. The colorimetric tube does not register a result.
- 20                  4. When the result is the lower concentration of the colorimetric tube  
21 concentration range or does not register a result, the lower concentration  
22 of the colorimetric tube concentration shall be considered the  
23 concentration result. Report the tube concentration range and tube  
24 concentration result for each reading. If a lower range colorimetric tube is  
25 not used and the tube concentration result is below the lower range of the  
26 colorimetric tube used, Respondent shall report the result as "less than" or  
27 "<" the lower range value of the tube. Notwithstanding the forgoing,  
28 Respondent shall ensure that the colorimetric tube result is below the upper

range of the colorimetric tube used and shall report the precise result of all results above the lowest range of the colorimetric tube used.

6. Respondent shall maintain adequate stock of appropriately ranged colorimetric tubes.
7. Respondent shall maintain a record of the following information, and provide such records to the South Coast AQMD pursuant to Condition No. 8:
  - a. The hourly and daily flow of landfill gas combusted, in standard cubic feet, in each flare (flares No. 1 & No. 2 under Permit G73696, A/N 645450; flare No. 3 under A/N 624296), the thermal oxidizer (under Envent Corporation A/N 645484), the second thermal oxidizer/flare (under Zeeco A/N 648539), and any other equipment used to combust or control landfill gas at the facility, and the total amount of landfill gas combusted at the facility;
  - b. The daily flow of landfill gas not flared, in standard cubic feet, if applicable; and
  - c. The results of the sulfur readings, sampling, and analyses, calculated as H<sub>2</sub>S with the time and date when each measurement or sample collection was conducted.
8. Respondent shall submit a monthly written report on the landfill operation, progress of the status of the Landfill Gas Flares (flares No. 1 and No. 2 under Permit G73696, A/N 645450; flare No. 3 under A/N 624296), Landfill Gas Treatment System (under Permit G55163, A/N 603249), and efforts to resolve the total sulfur concentration in the landfill gas exceeding 150 ppmv calculated as H<sub>2</sub>S. As of March 21, 2024, monthly reports shall be submitted to South Coast AQMD on the 20<sup>th</sup> of each subsequent month, or the following business day, not later than 5:00pm via email to Baitong Chen, Air Quality Engineer, (bchen@aqmd.gov); Nathaniel Dickel, Senior Air Quality Engineer, (ndickel@aqmd.gov), and Christina Ojeda, Air Quality Inspector, (cojeda@aqmd.gov). Each monthly report shall contain at a minimum the following information:
  - a. The landfill gas sulfur compounds measurements and laboratory analysis with the time and date of each measurement or sample collection, as identified in Condition No. 5.



- 1           b.     The landfill gas records and calculations identified in Condition No. 7, in a  
2                 Microsoft Excel spreadsheet format.
- 3           c.     The integrated landfill surface sample analysis and landfill surface monitoring  
4                 readings identified in Condition Nos. 9 and 10, in a Microsoft Excel spreadsheet  
5                 format.
- 6           d.     Estimated schedule for any replacement or refurbishment of granular activated  
7                 carbon media in the Landfill Gas Treatment System (under Permit G55163, A/N  
8                 603249) identified in Condition No. 3. The landfill gas temperature at inlet of the  
9                 Landfill Gas Treatment System (under Permit G55163, A/N 603249) identified in  
10                Condition No. 3(a).
- 11          e.     Description of any problems or delays, if any, encountered or projected to occur  
12                 pertinent to the execution of contracts, as well as the delivery, replacement, startup,  
13                 and testing of any operation necessary to replenish and/or replace spent granular  
14                 activated carbon media in the Landfill Gas Treatment System (under Permit  
15                 G55163, A/N 603249). Respondent shall submit copies of documents or other  
16                 records to support any problems or delays noted pursuant to this Condition No. 8(e)  
17                 along with such description.
- 18          f.     Specifications of the equipment and materials used for the weekly colorimetric tests  
19                 (only if there is a change from the previously provided specifications of the  
20                 colorimetric instrumentation or method used).
- 21          g.     All wellhead temperature, temperature probe, and CO concentration readings, lab  
22                 analysis, and Draeger tube readings for landfill gas from the past month in a  
23                 Microsoft Excel spreadsheet format.
- 24          h.     A graphic map showing location of each well with temperature exceedances (above  
25                 145 degrees Fahrenheit), each well with CO exceedances (above 1,000 ppmv and  
26                 below 1,500 ppmv, and above 1,500 ppmv), and stratification of temperature ranges  
27                 during that month, which includes a description of any remedial measures taken to  
28                 address or lower gas well temperatures.

- i. All vertical liquid impacted landfill gas wells, per Condition No. 17, including a description of any remedial measures taken to address or reduce liquids in landfill gas wells.
- j. Updates on the investigation into the availability, viability, and utilization, including pilot testing if needed, of an alternative sulfur compound treatment system that controls, treats, or removes dimethyl sulfide ("DMS") and other sulfur compounds, if any.
- k. A summary report on SCS's implemented improvements to the landfill gas collection system.
- l. An inspection log for landfill cover inspections, pursuant to Condition No. 30.
- m. Any subsequent additions to the landfill gas collection system, pursuant to Condition No. 15.
- n. Any subsequent additions to the landfill gas condensate or leachate collection system, such as dewatering sumps/pumps, or other dewatering work performed per the dewatering guidelines and implementation plan pursuant to Condition No. 18.
- o. Updates on the procurement and installation of the geosynthetic cover(s), pursuant to Condition No. 31.
- p. Updates on landfill excavation work subject to Rule 1150, including excavation location(s) (that are identified on graphic map(s) of the landfill), and excavated/exposed waste characteristics (saturated, semi-dry, dry, odor type and intensity, etc.) Excavation work occurring pursuant to an exemption as listed in South Coast AQMD Rule 1150(c)(3), or Rule 1150(c)(2) that is performed in the Reaction Area, must also be included in these updates.
- q. Updates regarding leachate including:
  - i. Leachate temperature recordings pursuant to Condition No. 27(a);
  - ii. Daily log of inspection findings and containment activities pursuant to Condition 27(b);



- iii. Weekly record of leachate seepage and pooling pursuant to Condition 27(c);
- iv. Quantity of leachate measured, and associated company name and physical address of the off-site disposal/treatment facility(ies) that receive leachate generated by the landfill, pursuant to Condition 27(d); and
- v. A list of all hazardous and non-hazardous liquid storage and treatment facilities that have been contacted and current status of each facility including available, contracted, and utilized capacity to receive hazardous and non-hazardous landfill liquids.

9. Respondent shall collect integrated landfill surface samples for analysis across the Reaction Area (as defined in Condition 9(a)) at least every two weeks as specified in Rule 1150.1 Attachment A 2.0. In the event Respondent is unable to sample specific landfill surface area(s) or grid(s) due to inaccessibility or dangerous conditions for a technician, Respondent shall document the date and the conditions that do not allow the sampling of the specific area(s) or grid(s). Documentation shall be sufficient to show the inaccessibility or dangerous conditions and may include weather forecasts and actual rainfall measurements, or photographs and/or videos that depict the site conditions that prevent such sampling activities for each specific area or grid affected.

- a. The "Reaction Area" shall be defined initially by the boundary of Cells 1/2A, 2B/3, 4, and Module 2B/3/4 P2. The boundary of the Reaction Area shall be modified to include the associated landfill surface area of the cells and modules that experience well temperatures of at least 170 degrees Fahrenheit, settlement, cracks in the landfill cover, presence and quantity of liquids, the presence of hydrogen in the landfill gas, and readings of temperature probes (once data is available). The Reaction Committee (defined in Condition No. 12), shall transmit to the South Coast AQMD [attn: Baitong Chen, [bchen@aqmd.gov](mailto:bchen@aqmd.gov); Nathaniel Dickel,



1 ndickel@aqmd.gov; Christina Ojeda, cojeda@aqmd.gov]: 1) the revised  
2 map which clearly displays the proposed boundary change(s) and depicts  
3 the new Reaction Area; 2) a narrative summary explaining the rationale  
4 behind the proposed changes, including memorializing any dissenting  
5 view of any member of the Reaction Committee; 3) any supporting data  
6 relied upon in the decision to revise the Reaction Area; and 4) locations of  
7 each temperature probe, clearly distinguished from the landfill gas wells  
8 on the map.

9 b. The Reaction Committee shall review applicable data and shall consider  
10 revision to the Reaction Area as frequently as appropriate but shall make  
11 a determination about whether to revise the Reaction Area map at least  
12 once per month, with the determination and revised Reaction Area map (if  
13 applicable) and temperature probe readings (once data is available) in an  
14 Excel format, submitted to the South Coast AQMD [attn: Baitong Chen,  
15 bchen@aqmd.gov; Nathaniel Dickel, ndickel@aqmd.gov; Christina  
16 Ojeda, cojeda@aqmd.gov] no later 7 days following the end of the month.

17 10. Respondent shall conduct instantaneous landfill surface monitoring across the Reaction  
18 Area (as defined in Condition 9(a)) at least every two weeks as specified in Rule 1150.1,  
19 Attachment A 3.0, beginning no later than seven (7) days after the issuance of this Order.  
20 In the event Respondent is unable to monitor specific landfill surface area(s) or grid(s) due  
21 to inaccessibility or dangerous conditions for a technician, Respondent shall document the  
22 date and the conditions that do not allow the monitoring of the specific area(s) or grid(s).

23 11. Respondent shall continue operating its flares and landfill gas treatment system even if the  
24 emitted landfill gas exceeds the limits on total reduced sulfur and SO<sub>x</sub> laid out in CCL's  
25 permits (Permit G55163, Condition Nos. 11 and 16 and CCL's Facility-Wide Permit,  
26 Condition No. 3) and South Coast AQMD Rules 431.1(c)(2), 3002(c)(1), and 203(b).  
27 Respondent shall include deviation reporting associated with exceedances of these  
28

emissions limits in its semi-annual Title V reports and in accordance with the requirements of Respondent's Title V permit.

### **Investigation of Underlying Reaction and Odor Impacts**

12. Respondent shall organize a committee (the "Reaction Committee") consisting of subject matter experts to aid in the investigation, impact assessment, and remediation of the ongoing landfill reaction and resultant odors as specified below. Respondent shall, through retention of one or more consultants and/or designation of one or more new or existing employees, complete the formation of the Reaction Committee within thirty (30) days of the issuance of this Order. Respondent shall, within thirty (30) days of the issuance of this Order, or within ten (10) days of their appointment, if appointment occurs after October 6, 2023, provide to the South Coast AQMD [Baitong Chen, Air Quality Engineer, (bchen@aqmd.gov); Nathaniel Dickel, Senior Air Quality Engineer, (ndickel@aqmd.gov), and Christina Ojeda, Air Quality Inspector (cojeda@aqmd.gov)] the names of all persons included in the Reaction Committee along with a Curriculum Vitae, or other description of the individual's credentials, experience, and/or expertise in the applicable subject matter.

a. The Reaction Committee shall include, at a minimum, at least one person with subject matter expertise in each of the following areas:

- i. Landfill design and operational best management practices;
- ii. Landfill gas collection/extraction systems, landfill gas condensate/leachate collection systems, and landfill gas control;
- iii. Chemical reaction(s) within landfills leading to formation of and elevated levels of dimethyl sulfide ("DMS") and non-methane organic compounds ("NMOC");
- iv. Public health relating to air quality and exposure to air contaminants including DMS. The public health member shall, at a minimum, apply CAAQS and applicable OEHHA standards, reference exposure levels, and cancer potency factors in performing analyses of potential health impacts or effects and in



1 reaching conclusions. The public health member shall also include  
2 in any human health screening evaluation an odor assessment  
3 evaluating the potential health impact of exposure to odorants in  
4 addition to cancer and non-cancer risk determination.

5 b. Reaction Committee members shall be subject to ongoing oversight by the South  
6 Coast AQMD. If in the South Coast AQMD's determination one or more members  
7 appointed by Respondent to the Reaction Committee is not serving in this capacity  
8 satisfactorily, as defined herein, South Coast AQMD may provide written notice  
9 to Respondent through Counsel that the applicable person(s) is no longer serving  
10 satisfactorily. Failure to serve in a satisfactory capacity is defined as:

- 11 i. Failure of a Reaction Committee member to attend regularly  
12 scheduled meetings of the Reaction Committee and South Coast  
13 AQMD technical staff without prior notice;
- 14 ii. Failure of a Reaction Committee member to meet deadlines  
15 imposed on the Reaction Committee for deliverables set forth in  
16 this Order;
- 17 iii. Failure of the Public Health member to include the analyses  
18 required by Condition 12(a)(iv); or
- 19 iv. Failure of a Reaction Committee member to respond in a timely  
20 and substantive manner to recommendations provided by South  
21 Coast AQMD technical staff, as required by Condition 12(f)(iv)

22 c. If Respondent receives such notice from South Coast AQMD, Respondent may  
23 respond in writing within ten (10) days to contest South Coast AQMD's  
24 conclusion and explain how the member will remedy the cited unsatisfactory  
25 conduct and why such conduct does not affect the member's ability to serve in a  
26 satisfactory capacity on the Reaction Committee in the future.

27 d. If South Coast AQMD receives such a response, South Coast AQMD shall have  
28 ten (10) days to determine whether a member of the Reaction Committee may  
continue to serve on the Reaction Committee. If South Coast AQMD determines  
that Respondent's written response does not address the alleged unsatisfactory



1 performance, then South Coast AQMD may petition for a status/modification  
2 hearing before the Hearing Board, and the Hearing Board shall determine if a  
3 member of the Reaction Committee should be removed.

4 e. While awaiting a decision from the Hearing Board, a member of the Reaction  
5 Committee may continue to serve on the Reaction Committee. If the Hearing  
6 Board determines that a member of the Reaction Committee's performance has  
7 not been satisfactory, then it may issue an Order directing Respondent to remove  
8 and replace that member of the Reaction Committee. Respondent shall remove the  
9 applicable person from any further work or service on the Reaction Committee  
10 within ten (10) days of receipt of the Order. Respondent shall identify and appoint  
11 a replacement member of the Reaction Committee, pursuant to Condition No.  
12 12(a) above, within thirty (30) days of receipt of the Order.

13 f. Beginning in March 2024, Respondent shall host a monthly virtual meeting with all  
14 members of the Reaction Committee and South Coast AQMD technical staff. The  
15 purpose of the monthly meeting shall be to allow Reaction Committee members to  
16 provide an update on progress of ongoing and future planned work performed/to be  
17 performed pursuant to this Order which is directly related to the subsurface reaction  
18 at the Landfill, and allow South Coast AQMD to provide recommendations and/or  
19 feedback on such progress.

20 i. To facilitate each meeting, Respondent shall provide South Coast  
21 AQMD (attn: Baitong Chen, [bchen@aqmd.gov](mailto:bchen@aqmd.gov); Nathaniel Dickel,  
22 [ndickel@aqmd.gov](mailto:ndickel@aqmd.gov); Christina Ojeda, [cojeda@aqmd.gov](mailto:cojeda@aqmd.gov); Payam  
23 Pakbin, [ppakbin@aqmd.gov](mailto:ppakbin@aqmd.gov); Kathryn Roberts,  
24 [kroberts@aqmd.gov](mailto:kroberts@aqmd.gov); Mary Reichert, [mreichert@aqmd.gov](mailto:mreichert@aqmd.gov)) a  
25 proposed agenda listing the topics to be discussed, and the  
26 presenter, not later than ten (10) calendar days prior to the meeting.  
27 South Coast AQMD shall have the option to expand the agenda to  
28 include additional topics within the purview of the Reaction  
Committee. If South Coast AQMD elects to expand the agenda, it

1 shall provide notice to Respondent not later than four (4) calendar  
2 days prior to the meeting.

3 ii. Respondent shall ensure that all members of the Reaction  
4 Committee with responsibility for any topic included on the  
5 agenda shall attend that month's meeting. At Respondent's  
6 election, additional staff or consultants may also attend. At South  
7 Coast AQMD's sole discretion, it may invite any staff or consultant  
8 of any regulatory agency with jurisdiction over Respondent,  
9 including jurisdiction predicated on the subsurface reaction at the  
10 Landfill, to participate in and provide recommendations or  
11 feedback on any agenda topics.

12 iii. South Coast AQMD, and any personnel invited pursuant to the  
13 clause above, may provide feedback or recommendations on any  
14 topic on the agenda. Comments noted as "recommendations" shall  
15 include suggestions to revise, change, expand, or otherwise alter  
16 any aspect of the topic discussed on the agenda. All other  
17 comments shall be considered feedback.

18 iv. Following each monthly meeting, Respondent shall prepare a  
19 summary of the meeting, including the topics discussed and all  
20 recommendations received. Respondent shall include in the  
21 summary a response from the Reaction Committee to all  
22 recommendations and, as applicable, any changes made as a result.  
23 Respondent, at its election, may also include a summary of and  
24 response to any feedback received. Respondent shall post the  
25 summary of the meeting to the webpage created pursuant to  
26 Condition No. 39, not later than twenty (20) days following the  
27 meeting.  
28



1 g. Respondent, through the Reaction Committee, shall conduct investigations and  
2 studies into the cause of the landfill reaction, the impact of air emissions, interim  
3 measures to limit odor transport, and corrective measures to reduce or abate the  
4 landfill reaction. Such investigations shall include, at a minimum:

5 i. A study into known and possible methods for effective treatment  
6 of DMS and preventative mechanisms for DMS formation in  
7 landfill gas, including assessment of other landfills and review of  
8 scientific studies. By no later than April 30, 2024, Respondent shall  
9 provide a report detailing the findings of this Landfill Gas DMS  
10 Treatment Study and the proposals for implementation of the  
11 treatment methods. This report shall be submitted to South Coast  
12 AQMD [Baitong Chen, Air Quality Engineer, (bchen@aqmd.gov);  
13 Nathaniel Dickel, Senior Air Quality Engineer,  
14 (ndickel@aqmd.gov), and Christina Ojeda, Air Quality Inspector,  
15 (cojeda@aqmd.gov)]. Respondent shall submit any required  
16 permit applications, with information included, for equipment  
17 installations or modifications necessary for implementation of the  
18 remedy strategies and/or treatment methods;

19 ii. An investigation and report on 1) the cause of the alleged chemical  
20 reaction(s) resulting in the elevated well temperatures, elevated  
21 levels of DMS formation in the landfill gas, and elevated levels of  
22 NMOC formation in the landfill gas and 2) solutions to slow and  
23 stop the reaction(s) in the landfill. Investigation into the cause of  
24 the alleged chemical reaction(s) shall include, but not be limited  
25 to, waste characterization study of waste disposed within the  
26 Reaction Area, to the extent records of such waste are within  
27 Respondent's possession, including (but not limited to) analysis of  
28 chemical and physical characteristics, BTU, moisture content,



1 biological methane potential. Respondent shall also conduct drill  
2 core sampling in the Reaction Area (as defined in Condition 9(a))  
3 to assess waste characterization in areas not affected by elevated  
4 temperatures at the time of drilling. Respondent shall submit a  
5 report on the findings of the investigation by no later than  
6 December 8, 2023 to South Coast AQMD [Baitong Chen, Air  
7 Quality Engineer, (bchen@aqmd.gov); Nathaniel Dickel, Senior  
8 Air Quality Engineer, (ndickel@aqmd.gov), and Christina Ojeda,  
9 Air Quality Inspector, (cojeda@aqmd.gov)];

- 10 iii. An investigation and report on the feasibility and availability of a  
11 continuous community emission monitoring system to conduct  
12 continuous monitoring and provide estimates of DMS  
13 concentrations at the facility fenceline and within the affected  
14 community. By no later than December 1, 2023, Respondent shall  
15 submit to the South Coast AQMD [Baitong Chen, Air Quality  
16 Engineer, (bchen@aqmd.gov); Nathaniel Dickel, Senior Air  
17 Quality Engineer, (ndickel@aqmd.gov), and Christina Ojeda, Air  
18 Quality Inspector, (cojeda@aqmd.gov)], the feasibility and  
19 availability findings of this fenceline and community DMS  
20 monitoring program. The findings shall identify all companies,  
21 vendors, contractors, and consultants that were inquired regarding  
22 the feasibility and availability and the results for each inquiry,  
23 including an ultimate decision if monitoring is feasible. If the  
24 Reaction Committee deems monitoring under this provision  
25 feasible, Respondent shall prepare and submit to the South Coast  
26 AQMD [Baitong Chen, Air Quality Engineer,  
27 (bchen@aqmd.gov); Nathaniel Dickel, Senior Air Quality  
28 Engineer, (ndickel@aqmd.gov), and Christina Ojeda, Air Quality

Inspector, (cojeda@aqmd.gov)] a workplan for the installation of and operation of the required monitoring equipment and related installations within thirty (30) days of the Reaction Committee's decision. This workplan will include a timeline for procurement of monitoring equipment and for the commencement of monitoring. It will also include a timeline for reporting out on the collected data, including a proposal relating to the real-time posting of monitoring data on Respondent's website or other regular report-outs on the data;

iv. A study and report on landfill best management practices and alternative methods to minimize the release of fugitive surface gas and minimize odors from fugitive surface gas, including cover practices at the Reaction Area (as defined in Condition 9(a)) and working face, and how best to address related odorous emissions, such as through the use of misting systems, fans, odor neutralizer, or other means. By no later than November 6, 2023, Respondent shall submit a report detailing the findings of this Fugitive Landfill Gas Odor Mitigation Study and the proposals for the minimization of landfill gas release and odors. This report shall be submitted to South Coast AQMD [Baitong Chen, Air Quality Engineer, (bchen@aqmd.gov); Nathaniel Dickel, Senior Air Quality Engineer, (ndickel@aqmd.gov), and Christina Ojeda, Air Quality Inspector, (cojeda@aqmd.gov)];

v. A report on the known health risks from acute and long-term exposure to DMS, including any action levels from other public health or government entities, and including a summary of recommended actions for persons exposed to DMS for acute and long-term durations. By no later than January 15, 2024,

1 Respondent shall submit this report to South Coast AQMD  
2 [Baitong Chen, Air Quality Engineer, (bchen@aqmd.gov);  
3 Nathaniel Dickel, Senior Air Quality Engineer,  
4 (ndickel@aqmd.gov), and Christina Ojeda, Air Quality Inspector,  
5 (cojeda@aqmd.gov)];

- 6 vi. A report of the health impacts from ongoing and long-term (e.g.  
7 greater than one year) exposure to hydrogen sulfide (H<sub>2</sub>S), or other  
8 speciated sulfur compounds, and any other hazardous air pollutants  
9 (HAPs), as defined in the federal Clean Air Act, 42 U.S.C. § 7412.  
10 The HAPs evaluated in the report shall include those which are  
11 detected: (1) in landfill gas over the past twelve months at the  
12 Chiquita Canyon Landfill as documented in the initial or additional  
13 flux chamber study (per Condition No. 12(f)) or detected in stack  
14 emissions testing; (2) in the liquids and leachate samples collected  
15 and analyzed (per Condition No. 37); (3) in air sampling performed  
16 to determine emissions from exposed liquids/leachate; and (4) in  
17 the community pursuant to the enhanced community air  
18 monitoring program in exceedance of recommended toxicity  
19 screening values published by the US EPA or other applicable  
20 screening values where US EPA toxicity screening values are  
21 unavailable. The report shall include, but not be limited to,  
22 assessment and analysis of any action levels from other public  
23 health or government entities in the United States for any such  
24 constituents, recommended actions for persons exposed to such  
25 constituents, and recommendations on how to limit any anticipated  
26 adverse health impacts. Such report shall also include a summary  
27 of all findings, health impacts and recommendations in an easy-to-  
28 read format designed for distribution to and use by the public. By



1 no later than August 1, 2024, Respondent shall submit this report  
2 to South Coast AQMD [Baitong Chen, Air Quality Engineer,  
3 (bchen@aqmd.gov); Nathaniel Dickel, Senior Air Quality  
4 Engineer, (ndickel@aqmd.gov), and Christina Ojeda, Air Quality  
5 Inspector, (cojeda@aqmd.gov)]; and

6 vii. The development of a model to estimate the quantity of liquid left  
7 in the landfill (including supporting assumptions, references, and  
8 calculations). By no later than May 21, 2024, Respondent shall  
9 submit to South Coast AQMD a report summarizing the model.

10 h. Respondent shall make public all reports resulting from investigations and studies  
11 done pursuant to this Condition through a link preceded by a brief narrative  
12 description on the webpage created pursuant to Condition No. 39.

13 i. Respondent has conducted an initial flux chamber study pursuant to the direction of  
14 the Los Angeles County Department of Public Health. Respondent shall submit a  
15 report documenting the findings of the initial study no later than October 31, 2023  
16 to South Coast AQMD [Baitong Chen, Air Quality Engineer, (bchen@aqmd.gov);  
17 Nathaniel Dickel, Senior Air Quality Engineer, (ndickel@aqmd.gov), and Christina  
18 Ojeda, Air Quality Inspector, (cojeda@aqmd.gov)]. Respondent shall conduct an  
19 additional landfill gas flux study for methane, non-methane organic compounds  
20 ("NMOC"), toxic air contaminants (TAC), total reduced sulfur ("TRS"), and  
21 speciated sulfur compounds to determine the surface flux throughout the landfill.  
22 The study shall be conducted through the use of dynamic flux chambers oriented at  
23 various locations throughout the landfill site. Respondent shall prepare a proposed  
24 protocol for the study based on the results of the initial study and shall submit the  
25 protocol to South Coast AQMD [Baitong Chen, Air Quality Engineer,  
26 (bchen@aqmd.gov); Nathaniel Dickel, Senior Air Quality Engineer,  
27 (ndickel@aqmd.gov), and Christina Ojeda, Air Quality Inspector,  
28 (cojeda@aqmd.gov)] for review and approval by December 31, 2023. A report

documenting the differences in the findings between the initial study and the additional study shall be submitted by no later than 90 days after South Coast AQMD approves the protocol to South Coast AQMD [Baitong Chen, Air Quality Engineer, (bchen@aqmd.gov); Nathaniel Dickel, Senior Air Quality Engineer, (ndickel@aqmd.gov), and Christina Ojeda, Air Quality Inspector, (cojeda@aqmd.gov)].

**Landfill Gas Collection and Leachate/Landfill Gas Condensate Collection and Storage Systems**

13. Respondent shall expand its gas well system. Respondent shall continue to operate the two sumps with pumps along the west slope until final design is implemented. Additional landfill gas collection equipment shall be operated as construction is completed. Respondent has installed 18 vertical dual extraction wells, and these 18 vertical dual extraction wells shall be connected to the landfill gas system by September 15, 2023 unless the circumstances outlined in Condition 13(a) apply.

a. In the event Respondent is unable to meet these deadlines due to inaccessibility or dangerous conditions for a technician, Respondent shall document the date and the conditions that do not allow the installation of the wells and/or their connection to the landfill gas system. Respondent shall submit this documentation to the South Coast AQMD and provide the South Coast AQMD with an updated date of completion for the required work.

14. Respondent shall continue to monitor each landfill gas collection system well at least monthly for at least temperature pursuant to 40 CFR Part 63 Subpart AAAA. Respondent shall address wells with a temperature reading of at least 170 degrees Fahrenheit or greater in accordance with 40 CFR 63 Subpart AAAA. Notwithstanding temperature exceedances, Respondent shall continue to operate all wells as necessary to ensure the continued operation of the landfill gas collection system.

a. Consistent with Respondent's Title V permit and all applicable rules and regulations, Respondent shall ensure the operation of the landfill gas



collection system equipment does not result in the release of raw landfill gas or condensate into the atmosphere.

- b. Any breakdown or malfunction of the landfill gas collection system resulting in the emission of raw landfill gas as described in Condition 14(a) shall be reported to the South Coast AQMD by phone (1-800-CUT-SMOG) or other District-approved method within one hour after occurrence or within one hour of the time said person knew or reasonably should have known of its occurrence and immediate remedial measures shall be undertaken to correct the problem and prevent further emissions into the atmosphere.

15. Respondent shall continue to evaluate and install, as needed, vertical dual extraction wells to collect both landfill gas and leachate. Respondent shall continue to expand the well-field as needed, and notify South Coast AQMD by October 31, 2023 of the number of wells added, attention to Baitong Chen, Air Quality Engineer, (bchen@aqmd.gov); Nathaniel Dickel, Senior Air Quality Engineer, (ndickel@aqmd.gov), and Christina Ojeda, Air Quality Inspector, (cojeda@aqmd.gov). Any subsequent additions to the well-field shall be documented in the monthly reports pursuant to Condition No. 8. In installing any additional wells, Respondent shall ensure it complies with all conditions in Respondent's currently operative landfill gas collection system permit. In installing any additional wells pursuant to this Condition, Respondent shall additionally take the following measures:

- a. By January 31, 2024, Respondent shall provide to the South Coast AQMD [attn: Baitong Chen, Air Quality Engineer, (bchen@aqmd.gov); Nathaniel Dickel, Senior Air Quality Engineer, (ndickel@aqmd.gov), and Christina Ojeda, Air Quality Inspector, (cojeda@aqmd.gov)] the design and installation schedule for a minimum of an additional seventy (70) wells and their associated piping. The proposed well locations and connecting piping shall be identified on a drawing which shows the entire gas collection system and shall be described in writing. Estimated



1 gas collection volume, well depths, pipe lengths, diameters and layouts  
2 shall be supplied to the South Coast AQMD in this advance notification.  
3 Updates to the design and schedule shall be provided in the monthly  
4 report pursuant to Condition No. 8(m);

- 5 b. Respondent shall expedite the installation of additional vertical landfill  
6 gas extraction wells in the Reaction Area, and shall achieve a vertical gas  
7 extraction well density of, at a minimum, an average of three (3) wells  
8 per acre within the estimated extent of elevated temperature landfill  
9 conditions as depicted by the Reaction Committee in their monthly  
10 determinations submitted in accordance with Condition 9(a). These wells  
11 shall be fully operational, working wells with the ability to extract  
12 landfill gas within the depths of the landfill waste mass and deliver it to  
13 the gas control system(s). The wells shall be installed with even  
14 dispersion, where each of the landfill's surface monitoring grids achieves  
15 a well density of at least two (2) vertical extraction wells per acre within  
16 any individual grid. This well installation goal shall be achieved by  
17 January 6, 2025, or otherwise approved by South Coast AQMD.

- 18 i. By April 18, 2024, Respondent shall provide to the South Coast  
19 AQMD [attn: Baitong Chen, Air Quality Engineer,  
20 (bchen@aqmd.gov); Nathaniel Dickel, Senior Air Quality  
21 Engineer, (ndickel@aqmd.gov), and Christina Ojeda, Air Quality  
22 Inspector, (cojeda@aqmd.gov)] an updated design and  
23 installation schedule incorporating the wells under Condition  
24 15(a) and the additional wells under Condition 15(b) and their  
25 associated piping. The information required by Condition 15(a)  
26 shall be included in the submission. Updates to the design and  
27 schedule shall be provided in the monthly report pursuant to  
28 Condition No. 8(m);

- 1 c. While installing wells pursuant to Conditions 15(a) and 15(b),  
2 Respondent shall notify the South Coast AQMD [attn: Baitong Chen, Air  
3 Quality Engineer, (bchen@aqmd.gov); Nathaniel Dickel, Senior Air  
4 Quality Engineer, (ndickel@aqmd.gov), and Christina Ojeda, Air Quality  
5 Inspector, (cojeda@aqmd.gov)] in writing, by Friday of each week,  
6 which wells are scheduled to be installed the following week;
- 7 d. Following installation of all wells pursuant to Conditions 15(a) and  
8 15(b), Respondent shall notify the South Coast AQMD in writing [attn:  
9 Baitong Chen, Air Quality Engineer, (bchen@aqmd.gov); Nathaniel  
10 Dickel, Senior Air Quality Engineer, (ndickel@aqmd.gov), and Christina  
11 Ojeda, Air Quality Inspector, (cojeda@aqmd.gov)] at least one (1) week  
12 in advance when an additional well or set of wells and their associated  
13 piping will be installed. The information required by Condition 15(a)  
14 shall be included in the notification. Updates to the design and schedule  
15 shall be provided in the monthly report pursuant to Condition No. 8(m);
- 16 e. During any well drilling a landfill gas control box shall be used to  
17 prevent the emissions of landfill gas into the atmosphere, and this control  
18 box shall be vented to an approved emissions control system;
- 19 f. Each well shall be completed and capped the same day its construction  
20 commences, unless the well hole is completely covered (using a  
21 minimum 8'x 8' at least 0.25" thick steel plate, and 12 inches depth of  
22 clean dirt), or the subsequently installed pipe is capped;
- 23 g. Each horizontal gas collection well shall be connected to an operating  
24 landfill gas header or the ends of the well shall be sealed with blind  
25 flanges, glued or fused caps, or other types of seals approved by the  
26 South Coast AQMD as soon as the well is installed;
- 27 h. All openings and connections of the landfill gas collection system shall  
28 be properly covered and sealed to prevent leaks in accordance with



Respondent's Title V Permit and in accordance with all applicable rules and regulations;

- i. Respondent shall install additional stainless steel, carbon steel, or chlorinated polyvinyl chloride (CPVC) wells in the Reaction Area per recommendation of the Reaction Committee. Stainless steel or carbon steel shall be installed for any well which has gas temperatures exceeding 170 degrees Fahrenheit;
- j. Following the installation of additional wells per Conditions 15(a) and 15(b), Respondent shall replace any wells in the Reaction Area which are damaged, blocked, pinched, or which have gas temperatures exceeding 145 degrees Fahrenheit with CPVC wells, carbon steel, and/or stainless steel wells, or add new wells that replace the landfill gas extraction capacity. Within 7 days of discovery of any such well, Respondent shall notify South Coast AQMD in writing [attn: Baitong Chen, Air Quality Engineer, ([bchen@aqmd.gov](mailto:bchen@aqmd.gov)); Nathaniel Dickel, Senior Air Quality Engineer, ([ndickel@aqmd.gov](mailto:ndickel@aqmd.gov)), and Christina Ojeda, Air Quality Inspector, ([cojeda@aqmd.gov](mailto:cojeda@aqmd.gov))] of a proposed installation schedule. Installation shall take place within 7 days of the notification, whenever feasible, but the schedule shall take into account availability of drilling equipment, replacement materials, and weather and safety conditions. Following initial notification, Respondent shall update South Coast AQMD in writing every 7 days until the well installation is complete, with evidence substantiating the delay, and additionally shall provide an updated installation schedule.
- k. Respondent shall, once additional/adequate gas extraction capacity is installed, operate gas extraction wells with less than 3 percent oxygen where feasible, and follow landfill best management practices to keep the oxygen below 5 percent in interior wells;



- 1                   l. Respondent shall install well boots seals on all wells in the Reaction  
2                   Area in accordance with the installation schedule for the geosynthetic  
3                   cover that is being installed pursuant to Condition No. 32 and consistent  
4                   with requirements of the Local Enforcement Agency;
- 5                   m. Respondent shall submit semi-annual as-built drawings in duplicate to  
6                   the South Coast AQMD [attn: Baitong Chen, Air Quality Engineer,  
7                   (bchen@aqmd.gov); Nathaniel Dickel, Senior Air Quality Engineer,  
8                   (ndickel@aqmd.gov), and Christina Ojeda, Air Quality Inspector,  
9                   (cojeda@aqmd.gov)]. As-built drawings shall depict all wells  
10                  constructed to date.
- 11   16.   Respondent shall submit, by October 6, 2023, a complete permit modification application  
12           for the Landfill Gas Collection System (under Permit G43917, A/N 578102) to increase the  
13           number of permitted wells in the well field. The submittal shall be accompanied with a  
14           complete Title V Revision application and shall be submitted with an expedited permit  
15           processing request and associated required fees, forms, and information.
- 16   17.   Respondent shall expeditiously dewater wells being impacted by liquids to the maximum  
17           extent feasible, and shall take proactive measures to remove additional liquids in the  
18           Reaction Area to limit the reaction severity and spread. This shall be accomplished through  
19           the installation of dewatering sumps/pumps of at least 60 percent of the landfill gas vertical  
20           extraction wells in the Reaction Area (as defined in Condition 9(a)) that are capable of  
21           extracting liquids by March 15, 2024 unless otherwise determined infeasible per Condition  
22           No. 17(a). below. Respondent shall provide updates in the monthly reports pursuant to  
23           Condition No. 8.
- 24                  a. In the event Respondent determines that the installation of dewatering  
25                  sump/pumps of at least 60 percent of the landfill gas vertical extraction  
26                  wells that are capable of extracting liquids to be infeasible, Respondent  
27                  shall provide detailed rationale and reasoning in the monthly report  
28                  submitted pursuant to Condition No. 8 and shall continue with

implementation of the dewatering guidelines pursuant to Condition No. 18 to remove liquids to the maximum extent possible.

18. Respondent shall, in addition to the installation of dewatering sumps/pumps specified in Condition No. 17 above, within ninety (90) days of the issuance of the Initial Order, provide proposed Reaction Area dewatering guidelines and implementation procedures for the landfill to South Coast AQMD (Baitong Chen, Air Quality Engineer, (bchen@aqmd.gov); Nathaniel Dickel, Senior Air Quality Engineer, (ndickel@aqmd.gov)) that include but are not limited to the following:

- a. Proposed methodologies and monitoring procedures that determine the level of dewatering within the Reaction Area (as defined in Condition 9(a)) wells impacted by liquid. Methods may include the measurement of the gas flow at each landfill gas collection well impacted by liquids;
- b. Use of dewatering pumps or other methods to remove liquids from Reaction Area (as defined in Condition 9(a)) wells impacted by liquids;
- c. An implementation plan for the use of dewatering pumps or other methods to remove liquids from the Reaction Area wells impacted by liquids. The plan shall include a list of wells in the Reaction Area and depth where liquids are expected to impact landfill gas collection efficacy or be a concern, the proposed action to remove the liquids, and the schedule for liquid removal. The implementation plan shall also include pro-active measures, such as additional dewatering pumps, to be installed at landfill gas collection wells where liquid impaction issues have not yet occurred, but may be expected to occur.
- d. Upgrades to the site leachate collection system as needed, including through the addition of increased air compressor and/or drain line infrastructure;
- e. Protocols for the pumping and monitoring of dewatering pumps and other such methods to remove water from Reaction Area (as defined in Condition 9(a)) wells impacted by liquids;



- f. Well field liquid sounding in the Reaction Area (as defined in Condition 9(a)), and a proposed schedule for conducting liquid sounding on a consistent basis;
- g. A timeline for appropriate reporting on impacted wells;
- h. The feasibility of integrity testing of all vertical gas wells in the Reaction Area (as defined in Condition 9(a)) and a timeline and protocol for addressing any wells that the integrity testing demonstrates are damaged or are exhibiting temperatures of at least 170 degrees Fahrenheit; and
- i. A timeline for implementation of appropriate dewatering procedures upon discovery of wells impacted by liquids.

Respondent shall, within 14 calendar days of approval of this Order, revise the dewatering guidelines according to the comments received by email on March 13, 2024, and re-submit the revised dewatering guidelines to South Coast AQMD for final approval. The proposed Reaction Area dewatering guidelines and implementation procedures shall be implemented within seven (7) days of South Coast AQMD approval, and shall be implemented to the maximum extent feasible if Respondent's facility is encountering leachate tank capacity shortages.

19. Respondent shall submit, by October 6, 2023, a complete permit modification application to the Landfill Gas Condensate and Leachate Collection/Storage System (under Permit G66132, A/N 613131) to increase the landfill's liquid storage capacity. The submittal shall be accompanied with a complete Title V Revision application and shall be submitted with an expedited permit processing request and associated required fees, forms, and information.
20. Respondent shall increase its landfill gas control capacity. Respondent has submitted a permit application for a new 6,000 scfm ultra-low emissions landfill gas flare (Flare No. 3), which is currently in a public comment period. Once the flare is fully permitted and fully operational equipment is received, Respondent shall have forty-five (45) days to finish installation and begin operating the new landfill gas flare unless the circumstances outlined in Condition No. 20(a) apply. Respondent shall notify the South Coast AQMD that the new



landfill gas flare is operational within 48 hours of beginning operation (Baitong Chen, Air Quality Engineer, (bchen@aqmd.gov); Nathaniel Dickel, Senior Air Quality Engineer, (ndickel@aqmd.gov), and Christina Ojeda, Air Quality Inspector, (cojeda@aqmd.gov)).

a. In the event Respondent is unable to meet these deadlines due to inaccessibility or dangerous conditions for a technician, Respondent shall document the date and the conditions that do not allow the installation of the new flare. Respondent shall submit this documentation to the South Coast AQMD and provide the South Coast AQMD with an updated date of completion for the required work.

21. Respondent shall submit, by October 31, 2023, a complete permit application for the new construction of a Landfill Gas Flare (Flare No. 4) to increase the landfill gas control capacity. The submittal shall be accompanied with a complete Title V Revision application and shall be submitted with an expedited permit processing request and associated required fees, forms, and information.

22. Respondent shall continue to use one or multiple portable thermal oxidizer(s)/flare(s) that operate under a permit to operate or temporary permit to operate for additional landfill gas control capacity until the Reaction Committee concludes that such portable thermal oxidizer(s)/flare(s) are no longer needed. Respondent shall notify the South Coast AQMD as to the Reaction Committee's recommendation within 48 hours of when the Reaction Committee's recommendation was determined (Baitong Chen, Air Quality Engineer, (bchen@aqmd.gov); Nathaniel Dickel, Senior Air Quality Engineer, (ndickel@aqmd.gov), and Christina Ojeda, Air Quality Inspector, (cojeda@aqmd.gov)).

23. Respondent shall continue to use both 4,000 scfm flares (under Permit No. G73696, A/N 645450) when the Reaction Committee determines that such use is necessary due to insufficient flaring capacity or other such necessity-based situations, until the second new 6,000 scfm ultra-low emissions flare (Flare No. 4) referenced in Condition No. 21 is permitted and operational.

24. Respondent shall operate and maintain the landfill so as to prevent standing leachate and the pooling or ponding of leachate exposed to atmosphere throughout the facility. If pooling

1 or ponding of liquid/leachate is occurring, safety permitting, the liquid/leachate shall be  
2 immediately collected and contained in a sealed tanker truck or leachate tank that minimizes  
3 emissions, or repairs promptly performed to redirect leachate into the leachate collection  
4 system.

5 25. Respondent shall, when encountering landfill leachate geysers or other discharges of  
6 pressurized leachate as a result of drilling/maintenance/other operations, perform actions to  
7 mitigate odors and the dispersion and exposure of leachate into the atmosphere, to the  
8 maximum extent possible. Upon the equalization of pressure or diminished flow/end of the  
9 landfill leachate geysers or other discharges of pressurized leachate, Respondent shall  
10 remove soil saturated with leachate or add sufficient dry soil cover to the soil saturated with  
11 the leachate, to mitigate the potential for odors from the saturated soil.

12 26. Respondent shall investigate and report on the feasibility of temporary containment  
13 measures for the purposes of controlling leachate and possible discharges of pressurized  
14 leachate when drilling additional holes for wells, liquid pumps, temperature devices, or  
15 other purposes. This Discharge of Pressurized Leachate Containment Feasibility Study  
16 shall include an analysis on the feasibility of a temporary tenting, containment  
17 vessel(s)/dome(s), other enclosure(s), or partial enclosure system designed to collect and  
18 contain the leachate flow while limiting the escape of odors produced from drilling/  
19 discharges of pressurized leachate, to allow for additional well drilling in the Reaction Area.  
20 By no later than March 12, 2024, Respondent shall submit to South Coast AQMD [Baitong  
21 Chen, Air Quality Engineer, (bchen@aqmd.gov); Nathaniel Dickel, Senior Air Quality  
22 Engineer, (ndickel@aqmd.gov), and Christina Ojeda, Air Quality Inspector,  
23 (cojeda@aqmd.gov)], a report on the findings of this feasibility study.

24 27. Respondent shall conduct the following actions and report them to South Coast AQMD  
25 [Baitong Chen, Air Quality Engineer, (bchen@aqmd.gov); Nathaniel Dickel, Senior Air  
26 Quality Engineer, (ndickel@aqmd.gov), and Christina Ojeda, Air Quality Inspector,  
27 (cojeda@aqmd.gov)] in each monthly report submitted pursuant to Condition No. 8  
28 beginning with the report due on February 19, 2024:



- 1 a. Measure and record the leachate temperature within the four (4) 6-inch  
2 inch leachate pipes feeding into the onsite frac tanks, and at the piping  
3 leading into the tanks at the bottom of the hill;
- 4 b. Respondent shall have dedicated staff or a contractor conduct and  
5 document inspections twice each calendar day, once in the morning,  
6 completing the inspection prior to 10 am, and once in the afternoon,  
7 starting the inspection at 1 pm at the earliest. The inspections shall begin  
8 with the surface of the Western and Northern slopes of the Reaction Area  
9 for liquid/leachate seepage and pooling and shall additionally consist of  
10 inspecting the facility's stormwater channel(s), and the facility's  
11 stormwater basin(s). Respondent shall maintain records from each  
12 inspection that include the details of any leachate seepage and pooling,  
13 including location(s) (identified on graphic map(s) of the landfill), time  
14 discovered, estimated duration of presence of leachate at such locations,  
15 the characteristics of the leachate (estimated quantity, extent of area  
16 impacted, odor type and intensity), the leachate saturation level of  
17 surrounding soils (standing free liquid, saturated, semi-dry, dry), and  
18 additional containment systems or measures deployed to route, collect,  
19 and contain the exposed leachate and prevent further leachate exposure;
- 20 i. In the event that two weeks of twice daily inspections show no  
21 exposed liquid/leachate seepage or pooling, Respondent may  
22 reduce the inspection frequency to once daily. If after another two  
23 weeks of daily inspections, no exposed liquid/leachate seepage or  
24 pooling is observed, Respondent may reduce the inspection  
25 frequency to once every other day during the operating week (i.e.,  
26 three times each operating week). If at any point inspections  
27 show exposed liquid/leachate seepage or pooling, inspection  
28 frequency shall return to twice daily inspections.



- 1 c. On a weekly basis, compile and report the details of the inspection logs  
2 from that calendar week required under Condition 27(b). Respondent  
3 shall additionally report on any ongoing leachate seepage and pooling at  
4 the landfill, found to have occurred at a location more than once within  
5 the calendar week, including location(s) (identified on graphic map(s) of  
6 the landfill), estimated duration of presence of leachate at such locations,  
7 characteristics of leachate (estimated quantity, extent of area impacted,  
8 odor type and intensity), leachate saturation of surrounding soils  
9 (standing free liquid, saturated, semi-dry, dry), and containment systems  
10 or measures deployed to route, collect, and contain the exposed leachate  
11 and prevent further leachate exposure. By no later than January 23, 2024,  
12 Respondent shall submit to South Coast AQMD [Baitong Chen, Air  
13 Quality Engineer, (bchen@aqmd.gov); Nathaniel Dickel, Senior Air  
14 Quality Engineer, (ndickel@aqmd.gov), and Christina Ojeda, Air Quality  
15 Inspector, (cojeda@aqmd.gov)], the first weekly report, and shall submit  
16 an additional weekly report every 7 calendar days thereafter;
- 17 d. Measure and record quantities of leachate sent off-site for  
18 disposal/treatment during the previous week for so long as all leachate is  
19 transported offsite for disposal. Records shall include the associated  
20 company name and physical address of the off-site disposal/treatment  
21 facility(ies) that receive leachate generated by the landfill. If Respondent  
22 begins onsite treatment, it shall also record on a weekly basis quantities  
23 of leachate collected and leachate treated onsite. Respondent shall report  
24 this information in the monthly reports pursuant to Condition 8(c).  
25 Respondent shall submit copies of the manifests to South Coast AQMD  
26 within three weeks of request.

- 27 28. Respondent shall operate and maintain the landfill gas collection and control system, and  
28 condensate/leachate collection system with materials capable of handling gases and/or

liquids at the temperatures recorded at landfill gas wells and/or the leachate temperatures measured pursuant to Condition No. 27(a). This shall include, but is not limited to, landfill gas extraction wells, liquid/leachate extraction wells, sumps, pumps, piping, French drain system(s), landfill gas treatment and control equipment, and condensate/leachate storage equipment. Respondent shall utilize casing materials for wells with elevated temperatures as agreed upon with the LEA. Information pertaining to the installed equipment and its specifications, including material/temperature threshold specifications, shall be provided to South Coast AQMD personnel within 48 hours of request. If Respondent is not in possession of this information, it shall be requested from the manufacturer within 24 hours of request by South Coast AQMD personnel and provided to South Coast AQMD personnel within 24 hours of receipt from the manufacturer.

29. Respondent shall ensure it has proper capacity (based on reporting pursuant to Condition 8) to accumulate onsite and/or dispose of collected liquids/leachate at an appropriate facility or facilities.

#### **Landfill Cover**

30. Respondent shall visually inspect the landfill cover around the Reaction Area (as defined in Condition No. 9(a)) each operating day and shall promptly repair any cover issues identified, which may include adding and spreading soil, wetting, and retracking any damaged area. Respondent shall maintain a log demonstrating that it has addressed any damages to the landfill cover, including the date the damage was identified, the action taken to repair the damage, and the time at which the repair was completed. Results of the daily inspection and the repair log required by this condition shall be included in the monthly reports required pursuant to Condition No. 8.
31. Respondent shall install a geosynthetic cover over western portions of Module 2B/3/4 Phase 2, Module 2B/3, and Module 4 to limit the migration of landfill gas from the site. Respondent shall submit the completed design for the cover, which will provide greater definition to the cover location, including associated landfill gas extraction infrastructure



1 to be installed underneath the cover, to the South Coast AQMD by September 12, 2023  
2 (Baitong Chen, Air Quality Engineer, ([bchen@aqmd.gov](mailto:bchen@aqmd.gov)); Nathaniel Dickel, Senior Air  
3 Quality Engineer, ([ndickel@aqmd.gov](mailto:ndickel@aqmd.gov)), and Christina Ojeda, Air Quality Inspector,  
4 ([cojeda@aqmd.gov](mailto:cojeda@aqmd.gov))). Respondent shall then obtain and install the geosynthetic cover  
5 material of at least 30 mil thickness. Respondent shall notify South Coast AQMD by  
6 October 31, 2023 (Baitong Chen, Air Quality Engineer, ([bchen@aqmd.gov](mailto:bchen@aqmd.gov)); Nathaniel  
7 Dickel, Senior Air Quality Engineer, ([ndickel@aqmd.gov](mailto:ndickel@aqmd.gov)), and Christina Ojeda, Air  
8 Quality Inspector, ([cojeda@aqmd.gov](mailto:cojeda@aqmd.gov))) on the progress of procuring and installing the  
9 geosynthetic cover. Respondent shall include updates on the procurement and installation  
10 of the geosynthetic cover in the monthly reports pursuant to Condition No. 8.

#### 11 **Ambient Air, Leachate & Emissions Monitoring**

12 32. The Reaction Committee shall review air dispersion modeling, smoke release studies, and  
13 computational fluid dynamics ("CFD") modeling that have previously been completed for  
14 the landfill to assess odor and emissions transport into the nearby community. The Reaction  
15 Committee shall use the previous models updated with current datapoints to undertake a  
16 study to determine odor and emission transport of odors from the landfill and to identify  
17 effective techniques that may be used to remedy potential odor impacts on the nearby  
18 community. The study shall include an evaluation of the efficacy of odor control measures,  
19 including but not limited to perimeter misting equipment, wind barriers, wind cutter fans,  
20 and odor dispersion/misting fans, for purposes of minimizing odors in the surrounding  
21 community. The study shall be based on both the landfill's current and projected closure  
22 in 2047, topography and configuration. The study shall include, but not be limited to,  
23 identifying transport trajectories and quantifying odor gas concentrations within the  
24 surrounding community. Upon completion of the study, a written report documenting the  
25 study and the findings, shall be submitted to South Coast AQMD by December 1, 2023.  
26 [Baitong Chen, Air Quality Engineer, ([bchen@aqmd.gov](mailto:bchen@aqmd.gov)); Nathaniel Dickel, Senior Air  
27 Quality Engineer, ([ndickel@aqmd.gov](mailto:ndickel@aqmd.gov)); Christina Ojeda, Air Quality Inspector,  
28 ([cojeda@aqmd.gov](mailto:cojeda@aqmd.gov))].



- 1 a. The report shall include a recommendation on whether additional modeling is  
2 recommended to fully address the current odor circumstances at the landfill and  
3 potential odor impacts on the nearby community.
- 4 b. If such additional modeling is recommended by the Reaction Committee, the  
5 Reaction Committee shall, within 45 days of providing the report and  
6 recommendation, provide a proposal to the South Coast AQMD that shall, at a  
7 minimum, include the following:
- 8 i. The identification and qualifications of the primary personnel  
9 and/or firms proposed to conduct the study, as well as the specific  
10 techniques and location(s) where the study will be conducted;
- 11 ii. A timeline for completion of the study and submittal of the final  
12 written reports to South Coast AQMD no later than 150 days after  
13 South Coast AQMD approval of the study proposal.
- 14 33. Respondent shall follow the direction of DPH to expand and enhance its current ambient  
15 air monitoring program to include DMS and other constituents of landfill gas, sampling at  
16 residential locals where recent odor complaints have been reported and at on-site locations  
17 where odors are most pronounced, and to conduct a flux chamber study (the “initial” flux  
18 chamber study discussed in Condition No. 12(d)). Any reports submitted to DPH related to  
19 these studies shall also be submitted to the South Coast AQMD (Baitong Chen, Air Quality  
20 Engineer, (bchen@aqmd.gov); Nathaniel Dickel, Senior Air Quality Engineer,  
21 (ndickel@aqmd.gov), and Christina Ojeda, Air Quality Inspector, (cojeda@aqmd.gov)).
- 22 34. By January 19, 2024, Respondent shall provide South Coast AQMD with access to all real-  
23 time continuous monitoring data for PM2.5, PM10, and H2S recorded at all monitoring  
24 stations (MS-01 through MS-12, and any subsequent additional monitoring stations).  
25 Respondent shall by January 19, 2024 or within 5 calendar days after enhanced monitors  
26 are brought online, provide South Coast AQMD with access to all real-time continuous  
27 monitoring data for total reduced sulfur (TRS) and toxic air contaminants (TAC) recorded  
28

1 by the enhanced monitors (MS-04, MS-12, and any additional enhanced monitors  
2 thereafter, including additional monitors as required by Condition No. 36.).

3 a. Within 30 days of this issuance of this Modified Order, Respondent shall ensure that  
4 weekly benzene and live, real-time H<sub>2</sub>S and methane concentration data from all  
5 monitors and/or 24 hour samples within the Val Verde and surrounding community  
6 are posted to and accessible at the webpage created pursuant to Condition 39 for  
7 public access, displayed in an easy to read graphical format plot with compound  
8 concentration (y-axis) in parts per billion volume (ppbV) vs. time (x-axis) in  
9 DD/MM/YYYY HH:MM format, which is simple to review and understand. The  
10 compounds concentration data displayed in the graphical plot in ppbV shall be plotted  
11 based on the finalized data as reported by the testing laboratory or monitoring device  
12 ensuring all significant figures are preserved and without rounding. The display shall  
13 allow the public to determine the benzene and real-time H<sub>2</sub>S and methane  
14 concentration, and the geographic location where the concentration is monitored. The  
15 graphical format plot shall additionally reference and display a horizontal dotted or  
16 dashed line for each compound's respective Reference Exposure Level (REL) (as  
17 applicable) established by California Office of Environmental Health Hazard  
18 Assessment (OEHHA): (1) the acute 1-hour OEHHA REL for H<sub>2</sub>S, which is the same  
19 as the state-level standard for this compound (30 ppb), and (2) the acute 1-hour  
20 OEHHA REL for benzene (8 ppb).

21 i. Real-time data shall include, but not be limited to, chronological one-hour  
22 average H<sub>2</sub>S concentrations as time series at each monitoring location. Wind  
23 speed and direction shall also be included, if currently monitored by  
24 Respondent.

25 ii. The website shall include a map which clearly marks the location of each air  
26 monitoring station.

27 b. Within 30 days of this issuance of this Order, weekly data (from Saturday at 12:00  
28 am to Friday at 11:59 pm) collected by these monitors shall be made available on the



webpage created pursuant to Condition No. 39, in a manner which allows for user defined data download, no later than the following Monday at 5:30 pm. Data from these monitors shall be kept on file and made available to South Coast AQMD personnel upon request.

- i. In the event of unexpected downtime of a monitor, bump tests, maintenance, or other scenario which may result in missing data or test data being recorded, by March 29, 2024, Respondent shall provide flags or other visual indicators on its website (created pursuant to Condition No. 39) for each data point/set that clearly indicate and document the range of dates/times with the missing or affected data, and indicate the reason for the missing or affected data.

35. Respondent shall, by January 19, 2024, provide all standard operating procedures (SOPs) and any other Quality Control and Quality Assurance (QA/QC) documents describing the operation and maintenance of all instruments used at the air monitoring stations and/or enhanced monitoring stations specified in Condition No. 34. These QA/QC documents shall include detailed information on the calibration, and maintenance of the monitoring equipment and associated instrumentation, and procedures used for data handling, validation, and analysis. They shall additionally include the frequency/schedule of these actions. Respondent shall provide these QA/QC documents to South Coast AQMD [Baitong Chen, Air Quality Engineer, (bchen@aqmd.gov); Nathaniel Dickel, Senior Air Quality Engineer, (ndickel@aqmd.gov); Christina Ojeda, Air Quality Inspector, Payam Pakbin, Atmospheric Measurements Manager, ppakbin@aqmd.gov]]. Respondent shall provide updates to these QA/QC documents (if any) and a log for calibration, and maintenance activities performed on the monitors in the monthly reports pursuant to Condition No. 8.

- a. Respondent shall provide South Coast AQMD with the same access that Respondent has to on-site and off-site monitoring equipment. With respect to on-site monitoring equipment, Respondent may require all visitors, including South Coast AQMD staff, to don appropriate personal protective equipment. Upon request by South Coast



1 AQMD, Respondent shall, within 24 hours, provide a list of all personal protective  
2 equipment that Respondent deems appropriate for accessing the monitoring  
3 equipment. Respondent shall not prohibit South Coast AQMD staff from access to  
4 Respondent's facility, including the monitoring equipment, if South Coast AQMD  
5 staff don all personal protective equipment included on a list issued by Respondent  
6 pursuant to this condition. With respect to off-site monitoring equipment, South Coast  
7 AQMD shall arrange permission from third-party property owners for access, if  
8 necessary, and Respondent shall provide access to equipment and accompany South  
9 Coast AQMD personnel.

- 10 36. Respondent shall, within 75 days of the issuance of this Order, install and maintain  
11 instrumentation within the nearby residential community, at sites MS-10 and MS-12, as  
12 defined in Respondent's existing Community Air Monitoring Program. These instruments  
13 shall be capable of measuring hourly concentrations of benzene, toluene, ethylbenzene,  
14 xylenes, and other relevant volatile organic compounds (VOC) with site surface emissions  
15 greater than 1 ton/year, as indicated in Table 5.5 of the Chiquita Canyon Landfill  
16 Assessment of Air Emissions from Landfill Surfaces Report dated October 2023.  
17 Respondent shall develop a monitoring plan that utilizes reliable and field-proven  
18 instrumentation, such as a micro gas chromatograph (MicroGC) with pre-concentration,  
19 and seek approval from South Coast AQMD. If measurement of any target compounds is  
20 not able to be practically achieved, Respondent shall inform and seek approval from South  
21 Coast AQMD. Respondent shall request and pay for expedited processing of all permits  
22 and procurement of the instruments, if available. To ensure Respondent is on schedule to  
23 complete installation within the 75 days, Respondent shall provide the South Coast AQMD  
24 (attn: Kathryn Roberts, [kroberts@aqmd.gov](mailto:kroberts@aqmd.gov); Mary Reichert, [mreichert@aqmd.gov](mailto:mreichert@aqmd.gov)) an  
25 update at intervals of 30 days and 60 days from the issuance of the Order. Respondent shall  
26 specifically address whether it believes an extension is necessary and provide supporting  
27  
28

documentation if it is seeking such extension. The AQMD may grant an extension of up to 60 days as appropriate based on the evidence submitted.

a. Upon installation, data from these instruments shall be made available to the public via the publicly accessible webpage detailed in Condition No. 34. The display shall additionally reference and display the acute 1-hour Reference Exposure Levels (RELs) for any compounds with established acute exposure limits by California Office of Environmental Health Hazard Assessment (OEHHA).

b. Until installation of the additional instrumentation is complete, Respondent shall increase the number of 24-hour time integrated canister sampling and analysis taken and analyzed for VOCs at MS-06 through MS-12 to three times per week.

37. Respondent shall, by March 5, 2024, take at least ten liquid samples from wells with pumps located in the Reaction Area, including wells with the highest average temperatures to the extent feasible. Respondent shall submit the liquid samples to a laboratory for analysis. Sampling and analysis shall be performed per U.S. EPA Method 624.1. Respondent shall, within 1 week of receipt from the contract laboratory, submit the results to South Coast AQMD (Baitong Chen, Air Quality Engineer, (bchen@aqmd.gov); Nathaniel Dickel, Senior Air Quality Engineer, (ndickei@aqmd.gov), and Christina Ojeda, Air Quality Inspector, (cojeda@aqmd.gov)). With the results, Respondent shall also submit laboratory analysis from samples taken on October 20, 2023 from leachate seeps on the western slope of the Reaction Area.

38. Respondent shall take at least one representative monthly sample of liquids from the Reaction Area of the Landfill and at least one representative monthly sample of leachate from the bottom tanks where liquids/leachate from the entire Landfill collect and analyze them per U.S. EPA Method 624.1 for the presence of volatile organic compounds (VOCs) and toxic air contaminants (TACs). In the event that Respondent demonstrates, to the satisfaction of South Coast AQMD, that generated liquid/leachate is sufficiently collected



1 with no remaining seepage or potential for discharges of pressurized leachate, then the  
2 leachate sampling and analysis shall be reduced to a quarterly schedule. If further leachate  
3 seepage or discharges of pressurized leachate are found to occur, resulting in the exposure  
4 of the liquid/leachate to atmosphere, then the sampling and analysis shall return to a  
5 monthly schedule. Respondent shall, within 1 week of receipt from the contract laboratory,  
6 post the analytical results on Respondent's website, and provide to South Coast AQMD  
7 along with a detailed description and depiction of the sampling locations (Baitong Chen,  
8 Air Quality Engineer, (bchen@aqmd.gov); Nathaniel Dickel, Senior Air Quality Engineer,  
9 (ndickel@aqmd.gov), and Christina Ojeda, Air Quality Inspector, (cojeda@aqmd.gov)).

### 10 **Community Outreach**

- 11 39. Respondent shall continue to maintain and update regularly (on a weekly basis) a dedicated  
12 page of its website with a highly visible link on its homepage (the "odor mitigation section")  
13 for presenting information discussing odor mitigation at CCL. Such webpage shall include  
14 all information in English and Spanish within 30 days of the issuance of this Order and  
15 meet the following requirements:
- 16 a. The odor mitigation webpage shall be accessible via a direct hyperlink included on  
17 the homepage of CCL's website (<https://chiquitacanyon.com>), via a clickable link  
18 with text stating "Odor Mitigation;"
  - 19 b. The odor mitigation webpage shall display prominently at the top of the page a  
20 notification that complaints of any odors believed to be caused by CCL can be made  
21 to CCL (24-Hour Hotline) at (661) 253-5155;
  - 22 c. The odor mitigation webpage shall display prominently at the top of the page a  
23 notification that complaints may also be submitted to the South Coast Air Quality  
24 Management District via telephone at 1 (800) CUT-SMOG or 1 (800) 288-7664 or  
25 online on South Coast AQMD's website (which shall hyperlink to the following:  
26 <http://www3.aqmd.gov/webappl/complaintsystemonline/NewComplaint.aspx>);  
27  
28

- 1 d. The odor mitigation webpage shall include a "Recent Updates" section which shall  
2 provide a narrative description of Respondent's understanding of the reaction and  
3 DMS;
- 4 e. The odor mitigation webpage shall include an "Odor Mitigation Efforts" section  
5 which shall describe the efforts Respondent is taking to mitigate potential odors;
- 6 f. The odor mitigation webpage shall include an "Odor and Maintenance Logs"  
7 section which shall include via hyperlink any logs created pursuant to this Order,  
8 preceded by a brief narrative description;
- 9 g. The odor mitigation webpage shall include a "Reports, Permits, and Other  
10 Documents" section which shall include via hyperlink, preceded by a brief narrative  
11 description:
- 12 i. This Order;
- 13 ii. Safety Data Sheets for odor neutralizer used at the facility and compounds  
14 used in the Semi-Permanent Vapor Odor Control system referenced in  
15 Condition No. 45;
- 16 iii. A copy of Respondent's current Conditional Use Permit (No. 2004-00052-  
17 (5));
- 18 iv. Any reports relating to odor or odor mitigation required by Respondent's  
19 Conditional Use Permit (No. 2004-00052-(5)) to be submitted to any  
20 government agency, including any responses or discussion of remedial actions  
21 to odor violations or complaints required by any government agency; and
- 22 v. All reports created by the Reaction Committee pursuant to this Order.
- 23 vi. Any other reports or correspondence requested by the County of Los Angeles  
24 agencies related to the reaction, odor, and Respondent's mitigation efforts.
- 25 h. The odor mitigation webpage shall include an "Air Monitoring and Health Impacts  
26 Section" which shall include a brief narrative describing the current status of air  
27 quality monitoring required under Condition 68 of Respondent's Conditional Use  
28



1 Permit (No. 2004-00052-(5)). The "Air Monitoring and Health Impacts Section"  
2 shall also include, via hyperlink, preceded by a brief narrative description:

3 i. Any consultant reports submitted to the Community Advisory Committee  
4 ("CAC"), TAC, or any government agency under Condition 68 of  
5 Respondent's Conditional Use Permit (No. 2004-00052-(5)).

6 ii. Any quarterly or annual reports submitted to the Los Angeles County  
7 Department of Public Health or South Coast AQMD under Condition 68 of  
8 Respondent's Conditional Use Permit (No. 2004-00052-(5)).

9 i. The odor mitigation webpage shall include an "Upcoming Public Meetings"  
10 Section, which shall display the title/subject, date, time, location and/or virtual  
11 access information (including videoconference link or teleconference number as  
12 applicable), and a note of whether public comment will be received for the following  
13 meetings:

14 i. Any noticed hearing of the South Coast AQMD Hearing Board in Case No.  
15 6177-4;

16 ii. Any meeting of the CAC where odor mitigation and/or violations are included  
17 as an agenda item or anticipated to be discussed;

18 iii. Any meeting of the TAC where odor mitigation and/or violations are included  
19 as an agenda item or anticipated to be discussed; and

20 iv. Any other meeting open to the public at which CCL is a scheduled host and/or  
21 participant where odor mitigation and/or violation are included as an agenda  
22 item or anticipated to be discussed.

23 40. Respondent shall host a public one-hour community meeting once each calendar month  
24 following a month in which Respondent receives three or more Rule 402 NOV's from the  
25 South Coast AQMD. If Respondent does not receive three or more Rule 402 NOV's from  
26 the South Coast AQMD in a calendar month, Respondent does not need to host a  
27 community meeting during the following month. During each meeting, Respondent shall  
28 provide updates with regards to implementation of this Order and make time available for

public comment on matters related to CCL. The meeting date and time and format (in-person or virtual) shall be announced via Respondent's website and shall also be sent via email to everyone who has signed up for email notifications on Respondent's website. The announcement shall include a link and dial-in information to the virtual platform used to conduct the meeting, or if the meeting is in-person, the location of the meeting. All meetings held in person shall adhere to all applicable public health guidelines and shall take place within the Val Verde community. Any presentation, meeting materials, or other media created or shared by Respondent at such community meeting shall be posted to Respondent's Odor Mitigation webpage via hyperlink, including a brief narrative description of the materials.

#### **Rule 1150 Landfill Excavation**

41. Respondent shall submit, by January 30, 2024, a complete plan application for a Rule 1150 Landfill Excavation Plan. The submittal shall be accompanied with a complete Title V Revision application and shall be submitted with an expedited processing request and associated required fees, forms, and information. A generic Rule 1150 plan application and Title V Revision application shall include the following:

- a. A signed and completed Form 400-A.
- b. A signed and completed Form 400-CEQA.
- c. Reason for excavation.
- d. A site summary indicating the site history.
- e. A list of materials buried or suspected materials buried in the site based on available records.
- f. Results of any boring tests done to characterize the disposal site.
- g. Results of recent landfill gas analysis or soil vapor phase analysis including the concentrations of methane, sulfur compounds, and speciated non-methane hydrocarbons.
- h. A plot plan indicating the location of the excavation, staging areas, vehicle route(s), vehicle cleaning area, and any nearby buildings, roadways, or other site

1 identifying features, and including any schools, residential area or other sensitive  
2 receptors such as hospitals or locations where children or elderly people live or  
3 work up to 2,500 feet away.

- 4 i. Operating schedule for excavation and removal (hours/day, days/week,  
5 weeks/year, or equivalent).
- 6 j. Scheduled excavation starting and completion dates, and number of working days  
7 required for the excavation.
- 8 k. Description of how the excavation will be conducted, including excavation  
9 equipment and vehicles hauling the excavated material.
- 10 l. Description of mitigation measures for dust, odors, and hydrocarbons.
- 11 m. Description of monitoring to be conducted, including monitoring equipment and  
12 techniques.
- 13 n. Total amount of material to be excavated in cubic yards under this project.
- 14 o. Description of disposal of the material (re-burial on-site or sent off site for  
15 disposal, if off-site provide name of landfill where material will be disposed).
- 16 p. Maximum surface area of excavation workface.
- 17 q. Maximum surface area of refuse or contaminated material to be exposed to  
18 atmosphere at any one time.
- 19 r. Fees in the amount \$1,090.43 (for Title V facilities, fee schedule FY 23-24).
- 20 s. A Title V Permit Revision application shall be submitted with associated  
21 application fees in the amount of \$1,820.84 (fee schedule FY 23-24) and required  
22 forms (Form 400-A, Form 500-A2, Form 500-C1).
- 23 t. A signed Form 400-XPP and additional 50% more fees from the plan fees listed  
24 above (\$545.22).

25 42. Respondent shall comply with the following requirements in the interim period, starting  
26 upon issuance of this Order and until the final approval of the Rule 1150 landfill  
27 excavation plan under the application specified in Condition No. 41 above, for all  
28



1 excavation, as defined in Rule 1150(a)(5), unless excavation is occurring pursuant to one  
2 or more exemption as listed in South Coast AQMD Rule 1150(c):

3 a. The South Coast AQMD shall be notified at least two (2) days prior to each  
4 excavation commencement and within five (5) days after its completion. The  
5 notification shall be made by email [Christina Ojeda, Air Quality Inspector,  
6 ([cojeda@aqmd.gov](mailto:cojeda@aqmd.gov)); Gerardo Vergara, Air Quality Inspector,  
7 ([gvergara@aqmd.gov](mailto:gvergara@aqmd.gov)); and [Rule1150notifications@aqmd.gov](mailto:Rule1150notifications@aqmd.gov)]. The subject line of  
8 the email shall contain "Rule 1150 Notification." The body of the email shall  
9 contain the following information:

10 i. Company Name and Company ID

11 ii. Site Address

12 iii. Notification Type (2 days prior or 5 days after)

13 iv. Estimated Excavation Start Date and Completion Date

14 v. A Map of the Facility with Excavation Location Indicated

15 b. Excavation shall not be conducted between the hours of 6:00 p.m. and 6:00 a.m. or  
16 on weekends and legal holidays unless excavation is occurring to comply with  
17 Condition 24, or otherwise approved in writing by the South Coast AQMD.

18 c. Excavation shall not be conducted on days when South Coast AQMD forecasts  
19 first, second, or third stage episodes for area number 13 or when South Coast  
20 AQMD requires companies in area number 13 to implement their first, second or  
21 third stage episode plans. Episode forecasts for the following day can be obtained  
22 by calling (800) 288-7664.

23 d. During excavation, continuous monitoring and recording of the wind speed and  
24 directions shall be conducted at an appropriate site or, through the meteorological  
25 station if present at the site.

26 e. Excavation shall not be conducted, except in the Reaction Area, when the wind  
27 speed is greater than 15 mph (averaged over 15 minutes) or the wind speed  
28 instantaneously exceeds 25 mph. If Respondent receives either any NOV for

violation of Section 41700 / Rule 402 or any complaints for dust, Respondent shall stop excavation in the Reaction Area during such wind conditions.

- f. During excavation, all working excavation areas, excavated material and unpaved roadways shall be watered down until the surface is moist and then maintained in a moist condition to minimize dust and emissions without creating a safety hazard condition.
- g. VOC contaminated soil (as defined by Rule 1166) shall not be spread onsite or offsite, nor stockpiled, if it results in uncontrolled evaporation of VOC to the atmosphere. VOC contaminated soil shall not be used for landfill cover.
- h. During excavation, monitoring for Total Organic Compounds as methane using an Organic Vapor Analyzer (OVA) or other monitor approved by the South Coast AQMD shall be conducted continuously at the working face of the excavation and at the downwind property line or other approved locations. The maximum sustained readings (greater than 15 seconds) shall be recorded every 15 minutes. The OVA or other approved monitor shall be calibrated each day in accordance with manufacturers' specifications.
- i. If the OVA or other approved organic monitor shows a sustained reading (greater than 15 seconds) of 2,000 ppmv Total Organic Compounds as methane or greater at the working face of the excavation, the excavation shall cease and the area generating the emissions shall immediately be completely covered with a minimum of 6 inches of clean dirt, plastic sheet, or other South Coast AQMD approved cover. Excavation shall not resume until the readings return to the pre-excavation level.
- j. If the OVA or other approved organic monitor shows a sustained reading (greater than 15 seconds) of 200 ppmv Total Organic Compounds as methane or greater downwind from the site at the property line (or other approved locations), the excavation shall cease and the area generating the emissions shall immediately be completely covered with a minimum of 6 inches of clean dirt, plastic sheet, or other



1 South Coast AQMD approved cover. Excavation shall not resume until the readings  
2 return to the pre-excavation level.

- 3 k. Excavated landfill material and refuse shall be immediately relocated for burial  
4 onsite or immediately deposited into trucks/trailers for off-site transport and  
5 completely covered with automated vinyl tarps, with such covers tied down, except  
6 for during active loading/unloading of refuse.
- 7 l. When refuse loading is completed and during transport, no material shall extend  
8 above the sides or rear of the truck or trailer which will haul the excavated material.  
9 Excavated material shall be completely covered with automated vinyl tarps, with  
10 the cover tied down.
- 11 m. Respondent shall ensure that there is no track-out from the excavation area.  
12 Respondent shall ensure that all trucks used for excavation in Reaction Area go  
13 through a rumble strip before exiting the excavation area, and Respondent shall  
14 ensure that all trucks shall, following the conclusion of excavation, but not less than  
15 once per day, be free of excavation materials.
- 16 n. Landfill materials and refuse which have been exposed to the atmosphere as a result  
17 of the excavation, which have not been excavated and relocated for burial or  
18 transported off site, shall be immediately covered (with a minimum of 6 inches of  
19 clean soil, secured plastic sheeting that is at least 10 mil, or other South Coast  
20 AQMD approved cover) whenever excavation is not actively in progress, and at the  
21 end of each working day so that no portion of landfill material and refuse is exposed  
22 to the atmosphere. Foam by itself shall not be used as a night cover if it is raining  
23 or rain is predicted by the National Weather Service prior to the next scheduled day  
24 of excavation.
- 25 o. Daily inspections shall be conducted of any covered excavation area (per  
26 Conditions 41(i), 41(j), and 41(n) above) to ensure the integrity of the cover(s) is  
27 maintained and secured so that no portion of the soil is exposed to atmosphere. If  
28 the cover material is not completely covering the landfill materials and refuse



generating emissions, or if the integrity of the cover has been compromised, immediate corrective action shall be taken to add and secure a new cover, or additional cover, on the area requiring corrective action. An inspection log shall be maintained to record the time of the inspections and any corrective action performed.

p. All materials that are listed as hazardous by a federal or state agency shall be considered "hazardous materials" for the purpose of this Order.

i. All excavated hazardous material shall be transported in such a manner as to prevent any emissions of hazardous materials.

ii. All hazardous materials shall be transported in containers clearly marked as to the type of material contained and what procedures should be followed in case of accidental spills.

iii. Excavated liquid hazardous materials with the potential to cause air emissions shall be encapsulated or enclosed in containers with sealed lids before loading into the transport vehicles.

q. Excavation, handling and stockpiling activities shall comply with the applicable requirements of Rule 403.

r. All records required to demonstrate compliance with Condition No. 42 shall be kept and maintained for at least 5 years.

s. Landfill excavation mitigation measures, other than those listed in this Condition No. 42, which South Coast AQMD personnel determine are necessary to protect the health and safety of the public, shall be implemented upon request.

#### **Other Conditions**

43. To ensure that fresh trash odors remain controlled, Respondent shall maintain the following fresh trash-related odor mitigation measures recommended by its landfill operations expert from the Stipulated Order for Abatement in Case No. 6177-1 during Unfavorable Wind Conditions, as defined in the Stipulated Order for Abatement in Case No. 6177-1. Respondent shall maintain the following odor mitigation measures:

- a. Use orchard fans, and tow-and-blow fans as needed, placed and spaced around the working face in accordance with the recommendations of Chiquita's landfill operations expert;
- b. Use equipment equipped with odor neutralizer misting systems in various portions of CCL to neutralize any fresh trash odors. This equipment shall include, but not be limited to, fans and arm tower misters;
- c. Identify and appropriately handle odorous loads at the scale and working face as new waste loads enter CCL;
- d. Haul odorous loads with proper sequencing and cover; and
- e. Regularly train staff on all aspects of landfill operations, employee safety, and odor control.

44. Respondent shall obtain, install, and maintain an on-site landfill meteorological station to measure wind speed and direction by October 31, 2023. The meteorological station shall be installed at a location appropriate for determining wind speed and direction on the top deck of the landfill in the Reaction Area (as defined in Condition 9(a)) on a 1-hour average basis, with measurements recorded every 5 minutes. The station shall record and preserve all available readings for three years and the readings shall be made available to the South Coast AQMD upon request.

45. Respondent shall install, maintain in good working order, and operate 1,000 feet or more of Semi-Permanent Vapor Odor Control in the Reaction Area (as defined in Condition 9(a)) within 14 days of the approval of this Order. Respondent shall operate the Semi-Permanent Vapor Odor Control system immediately and continuously.

46. Respondent shall operate and maintain in good working order a landfill perimeter odor control misting system on permanent fencing on the west and northwest of the property.

47. The landfill perimeter odor control misting system shall be operated immediately and continuously upon receiving data from the meteorological station, referenced in Condition No. 44 above, that the 1-hour averaged wind direction is blowing in West, Northwest, North, or Northeast directions (270 degrees to 45 degrees). The misting system shall



1 continue to operate until the 1-hour averaged wind direction data demonstrates the wind is  
2 no longer blowing in the specified directions. The system shall be operated in such a  
3 manner and with sufficient odor neutralizers to mitigate, to the extent possible, transient  
4 odors from the landfill into surrounding communities, as determined by the Reaction  
5 Committee.

6 48. Respondent shall notify the South Coast AQMD (attn: Kathryn Roberts,  
7 kroberts@aqmd.gov; Mary Reichert, mreichert@aqmd.gov; Christina Ojeda,  
8 cojeda@aqmd.gov) of any substantial operational changes designed to or anticipated to  
9 reduce odors, such as an operational change not contemplated by this Order, within seven  
10 days of implementing such changes.

11 49. Equipment and operations at the Facility are subject to the jurisdiction and regulatory  
12 requirements of multiple agencies, including but not limited to the District, CalRecycle,  
13 Los Angeles County Public Works, Los Angeles County Department of Regional Planning,  
14 and Los Angeles County Department of Public Health. The conditions in this Order shall  
15 not in any way restrict or expand the scope of jurisdiction of any agency. If any agency that  
16 shares jurisdiction over the Facility with the South Coast AQMD requires Respondent to  
17 take any action that is inconsistent with this Order, Respondent shall immediately contact  
18 the South Coast AQMD by email at [Kathryn Roberts, kroberts@aqmd.gov and Mary  
19 Reichert, mreichert@aqmd.gov] and describe the inconsistent provisions, including  
20 providing any written directive from any other agency which Respondent considers  
21 inconsistent with one or more conditions in this Order. Respondent shall endeavor to  
22 resolve the inconsistency with the Executive Officer, while adhering to the Condition(s) in  
23 the Order. If the inconsistency is not resolved within 3 working days of the relevant agency,  
24 Respondent shall immediately inform the South Coast AQMD and shall petition for a  
25 status/modification hearing before the Hearing Board for further proceedings. At such  
26 proceeding, only the provision in dispute shall be resolved by the Hearing Board while the  
27 other conditions in this Order shall remain in full force and effect.

28 a. If Respondent notifies South Coast AQMD per Condition No. 49 above

that the inconsistency with one or more Condition and an order of another agency cannot be resolved, compliance with the applicable Condition(s) of this Order shall be waived until further Order of the Hearing Board. Notwithstanding the above, in no instance shall compliance with Condition No. 49 or Condition No. 49(a) be waived.

50. Respondent shall provide a workplan which lists the actions that Respondent plans to take in order to address the subsurface reaction and return all aspects of the CCL to good and compliant working order, including liquid/leachate seepage and discharges of pressurized leachate, methane surface exceedances, fugitive emissions of landfill gas, well temperature exceedances, and non-compliant composition of landfill gas. This workplan shall include a timeline of the proposed work, and shall include both short-term and long-term solutions planned to mitigate impacts to the surrounding communities and return the facility into compliance. Respondent shall submit the complete workplan to South Coast AQMD by March 13, 2024 (Baitong Chen, Air Quality Engineer, (bchen@aqmd.gov); Nathaniel Dickel, Senior Air Quality Engineer, (ndickel@aqmd.gov), and Christina Ojeda, Air Quality Inspector, (cojeda@aqmd.gov). Respondent shall provide quarterly updates on the workplan, by the 13<sup>th</sup> day of every third month, starting June 13, 2024, specifying any updates to the plan or associated work timelines.

51. Respondent shall permit South Coast AQMD personnel to conduct all inspections deemed necessary by South Coast AQMD Compliance staff, including, but not limited to, collection of samples. If during any inspection, South Coast AQMD observes uncontrolled liquid which has at least one characteristic (including odor, appearance, etc.) that suggests the liquid may be leachate, South Coast AQMD may require Respondent to collect a sample of the liquid within 24 hours, submit the sample for expedited testing for VOCs, and submit test results to the South Coast AQMD Compliance Inspector within 24 hours of receipt of results, but no later than 96 hours after collection. Notwithstanding the preceding, Respondent may require all visitors, including South Coast AQMD staff, to don appropriate personal protective equipment prior to visiting the Reaction Area. Upon



request by South Coast AQMD, Respondent shall, within 24 hours, provide a list of all personal protective equipment that Respondent deems appropriate for visiting the Reaction Area. Respondent shall not prohibit South Coast AQMD staff from access to Respondent's facility, including the Reaction Area, if South Coast AQMD staff don all personal protective equipment included on a list issued by Respondent pursuant to this condition.

- a. To the extent Respondent's Health and Safety Plan requires 5-gas monitors for regulatory staff to conduct an on-site inspection, Respondent shall maintain onsite at least two 5-gas monitors (calibrated, sufficient battery, and ready for use) for regulatory personnel to use. Respondent may require any individual utilizing its 5-gas monitors to sign a waiver or release of liability in the form provided by Respondent.

52. Respondent shall reserve 30 minutes biweekly to host a virtual meeting between South Coast AQMD technical staff and Respondent / Respondent's technical consultants to discuss key updates on Respondent's implementation of this Order and any changes to Landfill conditions or operations. Any instance of the biweekly meeting may be cancelled at South Coast AQMD's sole discretion.
53. Respondent shall, on a weekly basis, report on: (1) number of tanks in each leachate tank group; (2) total number of leachate tanks treated; (3) weekly and year-to-date total quantity of liquid collected; (4) weekly and year-to-date total quantity of liquid treated; and (5) estimated weekly and year-to-date total quantity of seeping, pooling, or ponding leachate collected. By no later than April 3, 2024, Respondent shall submit South Coast AQMD (Baitong Chen, Air Quality Engineer, (bchen@aqmd.gov); Nathaniel Dickel, Senior Air Quality Engineer, (ndickel@aqmd.gov), and Christina Ojeda, Air Quality Inspector, (cojeda@aqmd.gov), the first weekly report, and shall submit an additional weekly report every 7 calendar days thereafter.
54. Respondent shall collect, convey, and store any condensate collected after the sulfur treatment carbon absorbers separately from landfill leachate. No combining or mixing of

1 these liquid materials shall occur, to allow for accurate characterization and profiling of each  
2 liquid.

3 55. Respondent shall immediately cease injection of landfill gas condensate into the landfill gas  
4 control flares, unless the condensate injection is initially performed for the purposes of a  
5 source test required under this condition. Any injection of condensate collected after the  
6 sulfur treatment carbon absorbers to the flares may be allowed if each of the following  
7 criteria are fulfilled:

- 8 a. The condensate has been sampled/analyzed and determined as non-  
9 hazardous in accordance with hazardous material requirements by  
10 respective agencies (U.S. EPA and DTSC), with sampling/analysis results  
11 provided to South Coast AQMD along with specified regulatory  
12 hazardous waste thresholds;
- 13 b. The condensate tank has not received any additional liquid after the  
14 sampling/analysis performed in Condition 37(a) and will not receive any  
15 additional liquids prior to or during injection/combustion;
- 16 c. Respondent has submitted a complete source test protocol which has been  
17 reviewed and approved by South Coast AQMD in writing, and which  
18 includes, at a minimum, procedures for testing of methane, total non-  
19 methane organic compounds, speciated organics (including but not limited  
20 to Rule 1150.1 Table 1 Carcinogenic and Toxic Air Contaminants), NOx  
21 as NO2, CO, particulate matter (PM10), oxygen and carbon dioxide,  
22 moisture content, temperature, flowrate, total sulfur compounds as H2S  
23 and speciated sulfur compounds, gas BTU value, nitrogen, methane and  
24 TNMOC destruction efficiency, and metals;
- 25 d. Respondent has submitted a source test report which has been reviewed  
26 and approved in writing by South Coast AQMD;
- 27 e. South Coast AQMD grants written approval to conduct condensate  
28 injection;



- f. Respondent conducts follow-up flare source testing, at a minimum of every 6 months, which includes non-hazardous condensate injection, and following the requirements of sub-item (d) above; and
- g. Respondent maintains records of condensate sampling/analysis results to demonstrate the liquid is non-hazardous, maintains records of daily condensate injection flows (gallons per day), and provides these records in the monthly report pursuant to Condition No. 8.

56. Respondent shall conduct sampling and analysis of vapors in the headspace of leachate tanks located in the Top Deck Tank Farm (Tank Farm #9). Sampling as required below shall be completed no later than April 4, 2024. Samples shall be collected and analyzed from the following equipment/locations:

- a. the vapors in the headspace of at least one untreated leachate storage tank (preferentially containing leachate that is determined to be hazardous or assumed to be hazardous in accordance with hazardous material requirements by respective regulatory agencies, e.g. U.S. EPA and/or DTSC);
- b. the vapors in the headspace of at least one leachate storage tank undergoing treatment at;
- c. the vapors in the headspace of at least one leachate storage tank where treatment is complete.

Each of the sampled storage tanks shall be filled at least 2/3 full of leachate (approximately 14,000 gallons). Tanks to be sampled shall be preferentially selected to be those not connected/vented to the landfill gas collection system and/or landfill gas control systems. Vapor sampling and analysis of the headspace shall be conducted for total sulfur compounds as H<sub>2</sub>S and speciated sulfur compounds pursuant to South Coast AQMD Method 307-91, and for speciated organic compounds pursuant to U.S. EPA Method TO-15. Sampling and analysis shall be performed by a South Coast AQMD Laboratory Approval Program (LAP) approved laboratory(ies), capable of sampling and analysis per South Coast AQMD Method

307-91 and U.S. EPA Method TO-15, respectively. A report detailing the sampling and analysis parameters and complete laboratory analysis results shall be submitted to South Coast AQMD by April 18, 2024 [Baitong Chen, Air Quality Engineer, ([bchen@aqmd.gov](mailto:bchen@aqmd.gov)); Nathaniel Dickel, Senior Air Quality Engineer, ([ndickel@aqmd.gov](mailto:ndickel@aqmd.gov)); Christina Ojeda, Air Quality Inspector, ([cojeda@aqmd.gov](mailto:cojeda@aqmd.gov))]. The report shall include, at a minimum, identification of the leachate tank(s) sampled, sample location within each leachate tank, vapor/liquid connections, ventilation (if applicable) and configuration of the tank(s) which were sampled, temperature of the leachate at time of sampling, date/time of sampling, treatment status of the tank(s), volume of leachate within the tank(s), and complete laboratory sampling and analysis results.

57. Respondent shall submit, by April 22, 2024, a complete permit modification application to the Landfill Gas Condensate and Leachate Collection/Storage System (under Permit G66132, A/N 613131) to increase the landfill's liquid storage capacity, including tanks and equipment which have not been described in the applications submitted pursuant to Condition 19. The submittal shall be accompanied with a complete Title V Revision application and shall be submitted with an expedited permit processing request and associated required fees, forms, and information.

58. Respondent shall submit, by June 21, 2024, a complete permit application for the operation of the thermal oxidizer (pursuant to Condition 29) to include the thermal oxidizer under Respondent's Title V permit. The submittal shall be accompanied with a complete Title V Revision application and shall be submitted with an expedited permit processing request and associated required fees, forms, and information.

59. Respondent shall submit, by June 21, 2024, a complete permit application for the Landfill Gas Condensate and Leachate Treatment System, which includes treating hazardous liquid waste. The submittal shall be accompanied with a complete Title V Revision application and shall be submitted with an expedited permit processing request and associated required fees, forms, and information.

60. Respondent shall submit, by April 22, 2024, a complete permit modification application to



1 the Landfill Gas Collection System (under Permit G43917, A/N 578102) to include the tie-  
2 in of the landfill gas condensate and leachate treatment system vapor vent lines to the  
3 Landfill Gas Collection System. The submittal shall be accompanied with a complete Title  
4 V Revision application and shall be submitted with an expedited permit processing request  
5 and associated required fees, forms, and information.

6 61. Respondent shall submit, by May 21, 2024, a complete permit modification application to  
7 the Landfill Gas Flare System (under Permit G73696, A/N 645450) to include the  
8 combustion of vapor vented from the hazardous liquid tanks in the landfill gas condensate  
9 and leachate collection/storage tank system and landfill gas condensate and leachate  
10 treatment system. The submittal shall be accompanied with a complete Title V Revision  
11 application and shall be submitted with an expedited permit processing request and  
12 associated required fees, forms, and information.

13 62. Respondent shall submit, by May 21, 2024, a complete permit modification application to  
14 the Landfill Gas Flare System (under A/N 624296) to include the combustion of vapor  
15 vented from the hazardous liquid tanks in the landfill gas condensate and leachate  
16 collection/storage tank system and landfill gas condensate and leachate treatment system.  
17 The submittal shall be accompanied with a complete Title V Revision application and shall  
18 be submitted with an expedited permit processing request and associated required fees,  
19 forms, and information.

20 63. By April 22, 2024, Respondent shall provide South Coast AQMD with a schematic of the  
21 current leachate treatment and storage system, including connections, flow lines, tank  
22 groups, vent lines to flares, lines to and between leachate tanks, and tanks which are  
23 connected and not connected to vacuum vent lines.

24 64. Respondent shall follow the direction of the EPA to prepare a Leachate Management Plan  
25 in accordance with the Unilateral Administrative Order (UAO). Respondent shall submit the  
26 final plan submitted to EPA to South Coast AQMD on or before March 28, 2024. Any  
27 updates to the final plan shall be submitted to South Coast AQMD within 24 hours of  
28 submittal to EPA.

- 1 65. Respondent shall provide notice to South Coast AQMD (Baitong Chen, Air Quality  
2 Engineer, (bchen@aqmd.gov); Nathaniel Dickel, Senior Air Quality Engineer,  
3 (ndickel@aqmd.gov); and Christina Ojeda, Air Quality Inspector, (cojeda@aqmd.gov) by  
4 Friday of each week a summary of leachate dewatering pumps that have been installed and  
5 resumed operation the prior week, and the number and location of dewatering pumps  
6 anticipated to be installed and placed into operation in the following week.
- 7 66. Respondent shall install and operate a real-time, remote monitoring system which shall, at  
8 minimum, monitor well pressure and landfill gas temperature at different well depths  
9 (shallow, middle, deep). The remote monitoring system may include monitoring of fixed  
10 gases, oxygen, methane, and carbon dioxide, as well as wellfield tuning/optimization and  
11 well liquid level monitoring. By April 19, 2024, the Reaction Committee shall submit  
12 recommendations regarding installation of the remote monitoring system. By no later than  
13 June 21, 2024, contracts to install and operate the monitoring shall be finalized. The remote  
14 monitoring system shall be installed and in operation no later than October 22, 2024, on all  
15 wells operated in the Initial Reaction Area (defined as the boundary of Cells 1/2A, 2B/3, 4,  
16 and Module 2B/3/4 P2 as specified in Condition No. 9(a)).
- 17 67. Respondent shall within 2 business days of the issuance of this Order designate an Inspection  
18 Liaison responsible for coordinating the exchange of information between Respondent and  
19 South Coast AQMD.
- 20 68. Respondent shall by May 31, 2024, install appropriately ranged differential pressure gauges,  
21 with at least 0.01 inches water column resolution, or pressure gauge otherwise approved in  
22 writing by South Coast AQMD, on each leachate storage tank. Respondent shall monitor  
23 and record daily the differential pressure of each leachate tank, tank identification number,  
24 date and time of the reading, and the personnel that conducted the reading. Pressure gauges  
25 shall be calibrated according to manufacturer specifications and schedule. Respondent shall  
26 report all the recordings in the monthly report pursuant to Condition No. 8.
- 27 69. Respondent shall return for a status hearing on April 24 and 25, 2024, or as soon thereafter  
28 as the Hearing Board can schedule the status hearing, to report on the status of



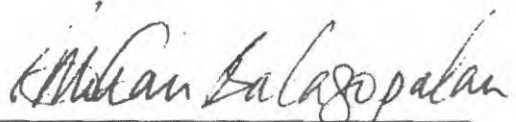
1 implementation of this Stipulated Order, and consider modification or dissolution of this  
2 Order, as appropriate. For the April 24-25, 2024, status hearing, Respondent shall present  
3 evidence, including a witness available to respond to questions, regarding Respondent's  
4 leachate treatment and disposal. Respondent shall also, by April 20, 2024, provide the South  
5 Coast AQMD Hearing Board with the latest monthly report prepared pursuant to Condition  
6 8 of this Stipulated Order and, by April 22, 2024, shall provide a workplan describing how  
7 Respondent will restart leachate pumping.

8 70. The Hearing Board may modify this Order for Abatement without the stipulation of the  
9 parties upon a showing of good cause therefore, and upon making the findings required by  
10 Health and Safety Code Section 42451(a) and District Rule 806(a). Any modification of the  
11 Order shall be made only at a public hearing held upon 10 days published notice and  
12 appropriate written notice to the Respondent.

13 71. The Hearing Board shall retain jurisdiction over this matter until September 6, 2024 and at  
14 that time this Order shall no longer be of any force or effect, unless this Order is amended,  
15 modified, or dissolved before then.

16 72. This Order for Abatement is not intended to be nor does it act as a variance. Respondent is  
17 subject to all rules and regulations of the District and to all applicable provisions of  
18 California law. Nothing herein shall be deemed or construed to limit the authority of the  
19 District to issue Notices of Violation, to seek civil penalties or injunctive relief, or to seek  
20 further Orders for Abatement or other administrative or legal relief. The Findings of Fact  
21 are based on evidence presented by Petitioner and Respondent as of the date of this Order.

22  
23  
24 BOARD MEMBER:

  
**Mohan Balagopalan**

25  
26  
27 DATED:

4/18/24

**PROOF OF SERVICE BY E-MAIL**

**Case No. 6177-4**


I, the undersigned, declare that I am employed in the **County of Los Angeles, State of California**. I am over the age of eighteen years and am not a party to the within action. My business address is **21865 Copley Drive, Diamond Bar, California 91765**.

<b>CALIFORNIA AIR RESOURCES BOARD</b> <u>variance@arb.ca.gov</u>	
<b>STEVE CASSULO</b> <b>DISTRICT MANAGER</b> <u>steven.cassulo@wasteconnections.com</u>	<b>JACOB P. DUGINSKI COUNSEL FOR</b> <b>CHIQUITA CANYON LLC</b> <b>BEVERIDGE &amp; DIAMOND</b> <u>JDuginski@bdlaw.com</u>
<b>MEGAN MORGAN</b> <b>BEVERIDGE &amp; DIAMOND</b> <u>MMorgan@bdlaw.com</u>	

**BY E-MAIL** - By transmitting a true pdf copy of the **Findings and Decision** before the **Hearing Board** by e-mail transmission from mtabbada@aqmd.gov to each of the interested party at the e-mail addresses set forth above. Said transmission(s) were completed on the aforesaid date at the time stated on declarant's email transmission record.

I declare under penalty of perjury under the laws of the **State of California** that the foregoing is true and correct.

Executed on **April 19, 2024** at Diamond Bar, California.

  
\_\_\_\_\_  
Monica Tabbada  
Office Assistant  
Clerk of the Boards