



January 31, 2025

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
csaucillo@dpw.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 December 2024. This letter serves as Chiquita's monthly update for January 2025.

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 two NOVs from the South Coast Air Quality Management District ("SCAQMD") for alleged violations of SCAQMD Rule 402 and California Health &

Safety Code § 41700 dated from January 1 through January 31, 2025. Copies of the NOV's 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 June 6, 2024 Compliance Order issued by the LEA can be found in the chart provided in Attachment C. Detailed information on Chiquita's implementation of the 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 NOV's

The SCAQMD Rule 402 NOV's 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/odor-mitigation/>.

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c/o Los Angeles County Public Works
January 31, 2025
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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 California Health & Safety Code § 41700. This Stipulated Order has since been modified on January 17, March 21, April 24, August 27, and November 13, 2024.

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 Compliance Order
D – Chart of Chiquita's Implementation of the EPA UAO

cc: David Nguyen, Public Works

ATTACHMENT A"



NOTICE OF VIOLATION

DATE OF VIOLATION		
Month	Day	Year
01	28	2025

Facility Name: CHIOUITA 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.

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 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	CH&SC 41700			FOR DISCHARGING SUCH QUANTITIES OF AIR CONTAMINANTS TO CAUSE INJURY, DETRIMENT 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 CASULO	Phone: 661-371-9214	Served By: HUGO CAMPUS	Date Notice Served: 01/28/2025
Title: DISTRICT MANAGER	Email: steve.ca@wasteconnections.com	Phone No.: <input checked="" type="checkbox"/> 909-396-2110 <input type="checkbox"/> 310-233-	Email: hcampus @ 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 80886

NOTICE OF VIOLATION

DATE OF VIOLATION		
Month	Day	Year
01	30	25

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

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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	<i>402</i>			<i>For discharging such quantities of air contaminants to cause injury, detriment, nuisance or annoyance to a considerable number of persons</i>
2	<input type="checkbox"/> SCAQMD <input checked="" type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	<i>41700</i>			
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: <i>Steven Cassulo</i>	Phone: <i>661-371-9214</i>	Served By: <i>Christina Ojeda</i>	Date Notice Served: <i>1-30-25</i>
Title: <i>district manager</i>	Email: <i>Steven.cassulo@wasteconnection.com</i>	Phone No: <i>909-396-2475</i> <i>310-233-</i>	Email: <i>cojeda @ aqmd.gov</i>
*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

ATTACHMENT D''

Action Items for South Coast Air Quality Management District

Case No. 6177-4 Stipulated Order for Abatement (chart modified on January 31, 2025)

Completed Actions

Condition No.	Key Action	Start Date/Deadline	Status
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

Condition No.	Key Action	Start Date/Deadline	Status
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
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
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
37	Submit the results to South Coast AQMD along with the lab analysis from the 10/20/23 sampling event	3/15/2024	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

Condition No.	Key Action	Start Date/Deadline	Status
36	Provide updates to South Coast AQMD on the installation of the continuous BTEX/VOC monitoring equipment	3/17/2024	Completed
12(i)	Conduct second flux chamber study	3/19-21/2024	Completed
67	Designate an Inspection Liaison	3/25/2024	Completed
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	4/5/2024	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(a)	Submit recommendations regarding installation of remote well pressure and temperature monitoring system	4/19/2024	Completed
15(a)	Provide updates to the design and schedule for the 70 wells in Condition 8 reports	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

Condition No.	Key Action	Start Date/Deadline	Status
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
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	5/1/2024	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	5/1/2024	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

Condition No.	Key Action	Start Date/Deadline	Status
12(i)	Submit report on second flux chamber study	6/3/2024	Completed
58	Submit expedited permit modification application for Zeeco TOX	6/21/2024	Completed
66(a)	Finalize contracts to install and operate remote well pressure and temperature monitoring system	6/21/2024	Completed
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	Completed
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	Completed
70	Submit a report on current and projected landfill gas generation and flaring capacity	6/28/2024	Completed
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	Completed
15(b)(i)	Install 50% of wells necessary to achieve well installation density	7/1/2024	Completed
68	Install pressure gauges on each leachate tank	7/10/2024	Completed
72(d)	Conduct pressure testing and monitoring within the HDPE headers venting the leachate tanks until pressure gauges are installed	7/10/2024	Completed
72(b)	Resubmit source test protocol for vapor flow testing	7/12/2024	Completed
72(e)	Install flow meters within the HDPE piping headers for the leachate tanks	7/19/2024	Completed
12(g)(vi)	Prepare and submit to South Coast AQMD a report of the health impacts from ongoing and long-term exposure to H ₂ S or other speciated sulfur compounds and other HAPs	8/1/2024	Completed

Condition No.	Key Action	Start Date/Deadline	Status
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	Completed
85(b)	Operate a Semi Permanent Vapor Odor Control System along the west slope excavation area	9/10/2024; ongoing during excavation	Completed
66(a)	Finalize contracts to install and operate the temperature remote monitoring system	9/17/2024	Completed
66(a)(i)	Submit the June 21, 2024 contract to install and operate the remote monitoring system to South Coast AQMD	9/17/2024	Completed
66(a)(ii)	Submit all known information of remote monitoring system design, implementation, installation, and specification issues/concerns	9/17/2024	Completed
27(f)	Develop and submit SOPs for leachate tank operations in tank farm areas	9/23/2024	Completed
34(c)	Third party must develop and install an automatic electronic notification system for the onsite air monitoring	9/23/2024	Completed
15(b)(ii), (iii)	Install 75% of wells necessary to achieve well installation density, and if cannot be installed to the desired depth in time, install 75% of wells necessary to achieve the well installation density at the depths achievable	10/1/2024	Completed
66(a)(iii)	Contact at least three reputable vendors/manufacturers/distributors for each of the remote monitoring systems, devices, and components that have identified issues/concerns and obtain proposed solutions and recommendations for each of the identified issues/concerns; submit the results of these communications to South Coast AQMD	10/11/2024	Completed
66(a)(v)	The Reaction Committee must determine the location for installation of the remote monitoring system equipment and submit its determination to South Coast AQMD	10/15/2024	Completed

Condition No.	Key Action	Start Date/Deadline	Status
66(a)(iv)	Submit the findings and solutions to issues documented in Condition 66(a)(ii) and (iii), including inventory of vertical wells and temperature monitoring probe network	10/30/2024	Completed
70(a)	Submit a permit application for the construction of Flare 5 and modifications of Flares 1 through 4, to the extent necessary, to increase the landfill gas control capacity	10/31/2024	Completed
86(c)	Install sampling ports on all leachate tanks for which leachate sampling would occur and would otherwise result in leachate exposure to open air during sampling; collect samples from such sampling ports	11/1/2024	Completed
86(c)	Prepare and submit a schematic of the leachate treatment equipment, showing where the sampling ports are located	11/1/2024	Completed
84	Evaluate the installation of the windbreaks and/or wind flow disrupters along the western and northern borders of the facility, and/or ridgeline; submit a report detailing the findings of the evaluation	11/15/2024	Completed
81(c)	Develop a system allowing members of the public to sign up for notifications of outages or downtime via email or text messages	11/18/2024	Completed
76	Install sampling ports on all equipment onsite that requires sampling to prevent unnecessary fugitive emissions from sampling activities	12/2/2024	Completed
88(b)	Install backup power at the Zeeco TOX	12/5/2024	Completed
72(c)	Submit a recommendation from the Reaction Committee on additional vapor flow testing	12/15/2024	Completed
66(a)(v)	Install and operate a remote monitoring system for temperature in at least 20 wellheads operated in the Condition 9(a) Reaction Area	12/31/2024	Completed
88(a)	Complete the connection of the flare station to permanent grid power	12/31/2024	Completed

Condition No.	Key Action	Start Date/Deadline	Status
31	Notify South Coast AQMD on progress of procuring and installing cover. 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	Notification on 10/31/2023; Installation on January 3, 2025	Completed; see Condition 8 monthly reports
15(b)	Install additional gas wells with the desired depth to achieve a vertical well density of an average of three operational wells per acre with at least two wells per acre. If this cannot be completed within the deadlines, install the wells to the depths achievable at the well installation density	1/6/2025	Completed
59	Submit expedited permit modification application for Landfill Gas Condensate and Leachate Treatment System for hazardous waste treatment	Submitted 6/21/2024; rejected by SCAQMD on 9/26/2024; revised in response to SCAQMD and re-submitted 1/10/2025	Completed
66(a)(vi)	Reaction Committee must submit a proposal to assess the viability and functionality of a remote monitoring system which measures temperature and pressure within a well with a pump located within the Reaction Area, including assessment of multiple depths within the well	1/31/2025	Completed

Ongoing Actions

Condition No.	Key Action	Start Date/Deadline	Status
1	Conduct odor surveillance at specified surveillance locations	9/7/2023; modified 8/27/2024; ongoing	Ongoing
1(e)	Maintain odor surveillance log	9/7/2023; ongoing	Ongoing
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	4/25/2024; ongoing	Ongoing

Condition No.	Key Action	Start Date/Deadline	Status
	additional fresh trash odor mitigation to assess if trash odors have dissipated		
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 ₂ S	3/22/2024; weekly	Ongoing
5	Sample LFG sulfur compounds for total sulfur compounds as H ₂ 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 ₂ 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; modified 8/27/2024; monthly	Ongoing; posted on Chiquita's website

Condition No.	Key Action	Start Date/Deadline	Status
9	Conduct integrated landfill surface sampling	9/20/2023; modified 8/27/2024; 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
9(b)	Submit monthly Reaction Area boundary determinations	10/6/2023; modified 11/13/2024; ongoing	Ongoing
10	Conduct instantaneous landfill surface monitoring	9/13/2023; modified 8/27/2024; 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 prepared pursuant to Condition 12 on Odor Mitigation webpage	9/7/2023; ongoing	Ongoing; posted on Chiquita's website
12(g)(vii)(1)	Update the liquid generation and total quantity model and submit a report to South Coast AQMD summarizing the updated model and results of modeling on a semi-annual basis	1/7/2025; semi-annually	Ongoing
12(i)	Conduct quarterly flux chamber studies	Quarter Four 2024; once every four months thereafter	Ongoing
12(i)	Submit quarterly flux chamber test reports	Fourth Quarter 2024 flux study report due 1/15/2025; subsequent reports due no later than 45 days after the end of the month during which a test was conducted, or no later than 90 days after approval of the	Ongoing

Condition No.	Key Action	Start Date/Deadline	Status
		protocol, whichever is later	
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 temperature 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 or malfunction and prevent further emissions	1/18/2024; as needed	Ongoing
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(b)(iv)	Conduct corrective actions and remonitoring/resampling if any reading of 500 ppmv TOC or greater is detected during instantaneous surface monitoring required by Condition 10	8/28/2024; ongoing	Ongoing
15(b)(v)	Conduct corrective actions and remonitoring/resampling if any reading of 25 ppmv TOC or greater is detected during integrated surface sampling required by Condition 9	8/28/2024; ongoing	Ongoing

Condition No.	Key Action	Start Date/Deadline	Status
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(m)	Submit semi-annual as-built drawings in duplicate to South Coast AQMD	Semi-annually	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
15(o)	Determine whether any of the existing landfill gas collection wells in the Reaction Area which were not able to be drilled and installed at the desired depth can be drilled deeper to achieve the desired depth or new replacement wells can be drilled nearby; report in Condition 8 reports	10/21/2024; ongoing	Ongoing; see Condition 8 monthly reports

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
18	Implement revised dewatering guidelines to the maximum extent feasible	Within 7 days of approval of revised guidelines; 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 to use Flares 1 and 2 until Flare 5 is permitted and operational	8/28/2024; 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

Condition No.	Key Action	Start Date/Deadline	Status
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
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
27(e)	Report leachate leaks or spills to South Coast AQMD within 48 hours of discovery	8/28/2024; as needed	Ongoing; will be posted on Chiquita's website
27(f)	Conduct daily inspections of leachate tanks, tank connections, ports, valves, tank hoses, and any equipment associated with leachate tank filling/emptying operations	8/28/2024; daily	Ongoing
27(g)	Do not overfill leachate collection/storage tanks or liquid treatment tanks	11/14/2024; 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 and landfill gas condensate onsite and/or dispose of it at appropriate facilities	3/22/2024; modified 11/13/2024; 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	4/25/2024; ongoing	Ongoing; see Condition 8 monthly reports

Condition No.	Key Action	Start Date/Deadline	Status
	of identification, safety permitting, or schedule permanent repair of geosynthetic cover immediately and permanently repair as soon as possible; maintain log of cover repairs		
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	Provide South Coast AQMD access to all real-time continuous monitoring data for PM2.5, PM10, H2S, recorded at all monitoring stations	1/19/2024; ongoing	Ongoing
34	Provide South Coast AQMD access to all real-time continuous monitoring data for TRS and TAC recorded by the enhanced monitors	1/19/2024 or within 5 calendar days after enhanced monitors are brought online; ongoing	Ongoing
34(a)	Ensure weekly 24-hour time-integrated canister samples for benzene, continuous H2S, and methane, and all hourly microGC DMS and VOC concentration data from current and future fenceline and community monitoring sites are posted to and accessible at Chiquita's webpage and provide link to download historical data in a compiled, usable format	11/14/2024; ongoing	Ongoing
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	11/14/2024; ongoing	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	3/29/2024; ongoing	Ongoing

Condition No.	Key Action	Start Date/Deadline	Status
	with missing or affected data and the reason for the missing or affected data		
35	Provide updates to the QA/QC documents, 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 NOV's	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; modified 8/27/2024; 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-	1/18/2024; as needed	Ongoing

Condition No.	Key Action	Start Date/Deadline	Status
	exempt Rule 1150 excavation activities until final approval of Rule 1150 landfill excavation plan		
42(v)	Post a notice on the front page of the main website and notify in writing all addresses located within 1 mile of the excavation area at least 48 hours in advance of planned excavation commencement. For unplanned excavation, or excavation where there is insufficient time to provide 48 hours' written notice, and such excavation is expected to last more than one day, post a notice on the website as soon as possible, not to exceed two business days. Submit notice to South Coast AQMD.	8/28/2024; as needed	Ongoing
42(w)	Conduct ambient air quality sampling within two hours of receipt of a Rule 402 NOV during excavation or when a distinct odor (level 3 or greater) resulting from the excavation is detected at or beyond the property line and analyze for TOC and speciated TOCs	8/28/2024; as needed	Ongoing
42(x)	During excavation, conduct ambient air quality sampling for TOC and speciated TOC at least once between the hours of 6:00am and 11:00am, and at least once between the hours of 2:00pm and 6:00pm	8/28/2024; 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 additional orchard fans to working face and surrounding area	4/25/2024; ongoing	Ongoing
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

Condition No.	Key Action	Start Date/Deadline	Status
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 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; modified 8/27/2024; 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
66	Monitor temperature and pressure at landfill gas collection wells within the Reaction Area	September 2024; twice monthly	Ongoing

Condition No.	Key Action	Start Date/Deadline	Status
68	Report daily pressure readings	7/10/2024; modified 8/27/2024; monthly	Ongoing; see Condition 8 monthly reports
68	Maintain tanks under negative pressure	8/28/2024; ongoing	Ongoing
69	Inspect and monitor piping materials for structural concerns; record monitoring activity and work performed to resolve any issues	7/19/2024; quarterly	Ongoing
72(a), (b)	Sample and analyze vapor flow in the piping used to vent the leachate tanks and landfill gas condensate tanks; submit results in monthly Condition 8 reports	10/17/2024; quarterly thereafter	Ongoing; see Condition 8 monthly reports
72(b)	Submit final source test report for vapor flow testing	11/15/2024; quarterly	Ongoing
72(e)	Report flow rate, flow meter location, related tank farm, and indication of each tank within the tank farm vented and represented in the flow rate to South Coast AQMD	7/19/2024; daily	Ongoing; see Condition 8 monthly reports
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	Ongoing
74	Expedite the procurement of the equipment needed to construct Flare No. 4	8/28/2024; ongoing	Ongoing
76	Install sample ports on new equipment brought on site that requires sampling	8/28/2024; as needed	Ongoing
79	Submit any permit applications, source test protocols, source test reports, and any other submittal requiring South Coast AQMD review and approval, with an expedited processing/review requested, along with any associated fees, forms, and information required	8/28/2024; ongoing	Ongoing
80	Whenever South Coast AQMD permitted Various Location equipment or PERP permitted	8/28/2024; as needed	Ongoing; see Condition 8 monthly reports

Condition No.	Key Action	Start Date/Deadline	Status
	equipment is brought or operated on site, provide notice to South Coast AQMD, maintain a daily log, and submit the daily log in the Condition 8 report		
81	Post an alert on the main website whenever any landfill gas collection and control equipment has planned or unplanned downtime anticipated to last 30 minutes or more, or once any downtime has a duration of 30 minutes or longer	8/28/2024; as needed	Ongoing
82	Notify South Coast AQMD whenever any landfill gas collection or control equipment has scheduled and/or unplanned downtime lasting 30 minutes or longer	8/28/2024; modified 11/13/2024; as needed	Ongoing
85(a)	Operate perimeter odor control misters along the west slope excavation area	8/28/2024; during the west slope excavation project	Ongoing
85(c)	Submit weekly reports on activities related to the west slope excavation project and the toe drain termination project	9/3/2024; modified 11/13/2024; weekly	Ongoing; will be posted on Chiquita's website
86(a)	Maintain and keep liquid treatment and storage equipment operating on site in good operating condition at all times in accordance with manufacturer's recommendations and industry best management practices	8/28/2024; until approval of the leachate treatment/storage permits	Ongoing
86(b)	Operate and maintain the liquid treatment and storage equipment by personnel properly trained in its operation	8/28/2024; until approval of the leachate treatment/storage permits	Ongoing
86(b)	Maintain training and qualification documentation regarding personnel operating the liquid treatment and storage equipment onsite and provide to South Coast AQMD upon request	8/28/2024; until approval of the leachate treatment/storage permits	Ongoing
86(c)	The operation of the equipment must not result in the release of any raw landfill gas, or discharge of odorous	8/28/2024; until approval of the leachate	Ongoing

Condition No.	Key Action	Start Date/Deadline	Status
	liquid vapors into the atmosphere, except for when collecting samples from leachate treatment equipment	treatment/storage permits	
86(d)	The liquid treatment system, leachate tanks, sludge/solids handling equipment and tanks, and any other equipment associated with the treatment or storage processes must be fully enclosed, under vacuum, and vented to appropriate control (i.e. flare station)	8/28/2024; until approval of the leachate treatment/storage permits	Ongoing
86(e)(i)	Inspect any liquid treatment system equipment under positive pressure for vapor leaks using a calibrated photoionization detector (PID)	8/28/2024; until approval of the leachate treatment/storage permits	Ongoing
86(e)(ii)	Repair vapor leaks within 1 calendar day of detection	8/28/2024; until approval of the leachate treatment/storage permits	Ongoing
86(e)(iii)	Log all vapor leak inspections in a log	8/28/2024; until approval of the leachate treatment/storage permits	Ongoing
86(e)(iii)	Keep and maintain records of vapor leak inspections for a minimum of 5 years and make them available to South Coast AQMD upon request	8/28/2024; ongoing	Ongoing
86(f)	Dedicated piping connected to the liquid treatment system, leachate tanks, solid handling tanks, and any other equipment associated with the treatment or storage process must be used for the sole purpose of providing vacuum to the leachate treatment equipment	8/28/2024; until approval of the leachate treatment/storage permits	Ongoing
86(g)	Sample ports must be installed at the locations of the 5 flow meters on the dedicated headers connected to the liquid treatment system, leachate tanks, solid handling tanks installed pursuant to Condition No. 72(e), and	8/28/2024; until approval of the leachate treatment/storage permits	Ongoing

Condition No.	Key Action	Start Date/Deadline	Status
	any other equipment associated with the treatment or storage process		
86(g)	Monitor sample ports at least daily for CH ₄ %, CO concentration (ppmv), CO ₂ %, and O ₂ %, flowrates, and pressures	8/28/2024; until approval of the leachate treatment/storage permits	Ongoing
87	Do not conduct planned landfill gas combustion/control equipment downtime for three or more units (flares/TOX) at any one time, unless approved by SCAQMD or where Chiquita is conducting work under a specified scenario that requires the gas flow to be cut off from the flares	11/14/2024; ongoing	Ongoing
88(b)	Maintain the existing flare station generators for the purpose of backup power at the flare station.	12/31/2024; ongoing	Ongoing
88(b)	Minimize the combustion/control equipment downtime as a result of power failure, and complete start up cycles in the prescribed time frames unless documented inaccessibility or dangerous conditions.	Once the flare station is connected to permanent grid power and backup power connection safety disconnect is installed at Zeeco TOX; ongoing	Ongoing
89	For any equipment for which Chiquita has submitted a permit application not covered under Condition 86, and for any equipment for which Chiquita is required to submit a permit application to SCAQMD, until the final approval of the permit application, Chiquita must properly maintain and keep in good operating condition the equipment and associated ancillary parts, and the equipment shall be operated and maintained by personnel properly trained in its operation	11/14/2024; ongoing	Ongoing
92	Submit any file(s) with a cumulative size larger than 35 MB via a shared link	11/14/2024; ongoing	Ongoing

Future Actions

Condition No.	Key Action	Start Date/Deadline	Status
78	Install a 60-mil liner overlaying two feet of compacted soil lining the bottom and 5 feet off the sides of the perimeter of each leachate tank and/or tank farms, except for driving lanes required for trucks to access leachate tanks for leachate disposal or other routine operations or maintenance	12/25/2024 (extension requested); seeking modification	
78	Inspect the sheeting/membrane liners under the tanks twice daily, at the beginning and end of the day	12/25/2024 (extension requested); seeking modification	
78	Maintain the sheeting/membrane liners under the tanks free of tears, rips, etc.	12/25/2024 (extension requested); seeking modification	
78	Record inspection and maintenance records for liners under the tanks	12/25/2024 (extension requested); seeking modification	
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	
12(i)	Prepare a proposed protocol for the flux chamber studies and submit to South Coast AQMD for review and approval, as needed	At least 75 days prior to the start of the month in which the test is planned	

Condition No.	Key Action	Start Date/Deadline	Status
12(i)	Notify South Coast AQMD of flux chamber test date for each test	At least 14 days prior to the scheduled test	
90	Submit a permit modification application for the Landfill Gas Condensate and Leachate Collection/Storage System	1/31/2025; extension requested; seeking modification	
91	Submit a permit application for each hazardous and non-hazardous liquid treatment system	1/31/2025; extension requested; seeking modification	
36(c)	Ensure the microGCs at MS-10 and MS-12 are capable of measuring hourly concentrations of acrolein	By the time of the February 2025 status hearing & pending EPA concurrence	
83	Conduct a study and analysis of specific landfill operational events from June 1, 2024 through December 31, 2024 and their potential emission impacts to the surrounding community, as determined from an analysis of the air quality data recorded at monitoring stations MS-01 through MS-12, and submit a report detailing the general findings of the study and a proposed scope for a continuation of the study	3/31/2025	
69	Submit a recommendation as to modifying the frequency of piping monitoring	7/31/2025	
15(b)(iii)	If vertical wells cannot be installed to the desired depth in accordance with the deadlines laid out in Condition 15(b)(i) and (ii), install vertical landfill gas extraction wells with the desired depth within the waste mass at the requisite well installation density in the Condition 9(a) Reaction Area	8/17/2026	

Condition No.	Key Action	Start Date/Deadline	Status
2	Make Odor Surveillance Logs available for inspection in an easy-to-review chart-style format	Within 5 working days of request	
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	
12	Provide new Reaction Committee member information to South Coast AQMD	As needed	
15(b)(vi)	Extensions to the well installation timelines under Condition 15(b)(iv) and (v) may be requested in writing	At least 7 days prior to the 30-day well installation deadline	
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	
27(f)	Implement SOPs for leachate tank operations in tank farm areas	Within 7 days of South Coast AQMD approval of the SOPs	
29	Comply with the Leachate Management Plan submitted to EPA under the UAO once approved by EPA	After EPA's approval of Leachate Management Plan	
34(c)	Third party must put automatic electronic notification system for the ambient air monitoring into effect	Within 3 business days of direction from South Coast AQMD	
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	Conduct source testing and obtain South Coast AQMD approval prior to injection of flare condensate	Prior to injection of flare condensate	
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	
66(a)(vi)	Conduct the feasibility assessment of the remote monitoring system which measures temperature and pressure within a well with a pump located within the Reaction Area	Upon South Coast AQMD approval of the proposal	
66(a)(vi)	The Reaction Committee must submit a report on the results of the feasibility study and	No later than 150 days from South Coast	

Condition No.	Key Action	Start Date/Deadline	Status
	recommendations on further deployment of the remote monitoring system	AQMD approval of the proposal	
81(c)	Deploy the downtime notification system	Within 3 business days of receipt of notice to deploy	
84	Complete the installation of windbreaks and/or wind flow disruptors if the Reaction Committee determines them to be technically feasible and South Coast AQMD determines them to be viable	Within 180 days after receipt of written approval by South Coast AQMD or 180 days after required regulatory approvals have been procured, whichever is later	

ATTACHMENT E"

Milestones Required by the June 6, 2024 LEA Compliance Order

Milestone #	Key Action	Start Date/Deadline	Status
1A-1	Submit a revised soil reaction break/barrier plan	November 26, 2024	Completed; submitted on November 26, 2024; LEA responded on December 24, requesting additional information to complete its technical review; provided the additional information on January 24, 2025
1A-2	Submit a revised report with CO and H2 readings for all gas collection wells in the reaction area and wells 200 feet outside the reaction area	June 11, 2024	Completed; see report on Chiquita's website
1A-3	Submit lab test results for all monthly LFG sampling (including CO and H2) from a set of LFG wells selected by the LEA	September 16, 2024; monthly by the 15th of the month	Ongoing; received clarification from LEA on certain items on November 19, 27, and December 3, 2024; awaiting further input from LEA; see monthly reports on Chiquita's website
1B-1	Submit a revised Completion Report for the installation of the temperature monitoring probes	June 11, 2024	Completed; see report on Chiquita's website
1B-2	Submit weekly temperature monitoring probe data reports	June 7, 2024; weekly, every Thursday	Ongoing; including updates on status of Chiquita's installation of additional temperature monitoring probes, in response to December 24 letter from LEA; see weekly reports on Chiquita's website
1B-3	Provide a temperature contour map showing color-coded observations based on the maximum observed temperature collected during the month	June 15, 2024; monthly by the 15th of the month	Ongoing; see monthly maps on Chiquita's website
1B-4	Install three temperature probes around the area that is extending south into areas outside of the previously defined reaction area	July 11, 2024 – on hold pending discussions with the LEA	LEA is no longer requiring Chiquita to install the three TMPs described in the Compliance Order, according to LEA letter dated January 10, 2025, based on its review of TMP data and on the installation of the 15 TMPs

			described in the revised soil reaction break/barrier plan
2A-1	Install the 30-mil HDPE geosynthetic cover over the 30-acre reaction settlement area and around any wells showing signs of reaction	January 17, 2025	Completed; Final Completion Report submitted on January 17, 2025; updates no longer required
2A-2	Provide weekly updates on the geosynthetic cover installation	June 14, 2024; weekly, every Friday	Completed; LEA no longer requires this status update because the geosynthetic cover has been fully installed
2B	Submit weekly cover reports tracking issues with the landfill soil and geosynthetic cover as well as settlement and stability concerns	Weekly, every Tuesday	Ongoing; see weekly updates on Chiquita's website; received related requests from LEA for FLIR surveys and LiDAR maps; under discussion with LEA
3-1	Ensure slope stability issues are included in the weekly cover reports	Weekly, every Tuesday	Ongoing; see weekly updates on Chiquita's website
3-2	Submit a west and north slope stability analysis final report that addresses LEA's comments	No longer required	LEA is no longer requiring Chiquita to submit the final report according to LEA letter dated September 17, 2024
4-1	Install and operate an additional 107 LFG extraction wells as per approved February 26, 2024 Remediation Plan for LFG Exceedance	July 31, 2024	Completed
4-1	Notify the LEA upon completion of installation and operation of additional 107 LFG extraction wells	July 31, 2024	Completed
4-1	Provide a final completion report for the 107 LFG wells	July 31, 2024	Completed; see report on Chiquita's website
4-2	Submit weekly status updates on the installation of the LFG extraction wells	Weekly, every Wednesday – no longer required	Completed; this status update is no longer required under the June 6, 2024 Compliance Order and the LEA letter dated May 8, 2024 because the 107 LFG extraction wells listed in the February 26, 2024 Remediation Plan have been installed
4-3	Submit weekly results of methane readings at wells GP-13 and GP-15	Weekly, every Wednesday	Ongoing; see weekly results on Chiquita's website

4-4	Demonstrate compliance with 27 CCR Section 20921 within the 120-day compliance period that begins after the completion of the planned LFG extraction well construction referred to in the February 2024 Remediation Plan	November 28, 2024 (120 days after completion of the LFG extraction well installation)	In progress; extension requested on September 25, 2024, and, in response to LEA input, extension requested again together with additional proposed measures as part of a Revised Remediation Plan submitted on November 18; under discussion with LEA
5	Submit monthly report with maps showing defined reaction area, expansion of reaction area if any, weekly temperature monitoring probe data, settlement with heat maps, and LFG data including but not limited to CO and H2 data	September 16, 2024; monthly by the 15th of the month	Ongoing; see monthly reports on Chiquita's website

ATTACHMENT F "

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; October 16, 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; updated July 2, 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
76-79	Submit revised cost estimate.	June 11, 2024	Completed
76-79	Submit revised cost estimate.	July 2, 2024	Completed
22(c)(2)	Submit revised Soil Reaction Break/Barrier Plan (part of Master Work Plan).	July 8, 2024	Completed
22(c)(3)	Submit revised Cover Installation Plan (part of Master Work Plan).	July 9, 2024	Completed
22(c)(5)	Submit revised Temperature Monitoring Plan (part of Master Work Plan).	July 17, 2024	Completed
30	Submit Data Management Plan.	July 17, 2024	Completed
80-86	Submit proposed financial assurance documents.	July 30, 2024	Completed
22(c)(1)	Submit second revised Leachate Management Plan.	August 2, 2024	Completed
82	Submit approved financial assurance mechanisms.	September 19-20, 2024	Completed
22(c)(7)	Submit revised Off-Site Mitigation Prevention Plan.	September 25, 2024	Completed

Paragraph #	Key Action	Start Date/Deadline	Status
73	Provide EPA with certificates of insurance and a copy of each insurance policy, naming EPA as an additional insured.	October 16, 2024	Completed
73, 75	Certify to EPA that Chiquita's contractors and subcontractors have obtained the required insurance.	October 16, 2024; recertified December 31, 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 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.	February 26, 2024; ongoing	Ongoing
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; ongoing	Submitted Plan; Revised Leachate Management Plan (submitted on January 10, 2025); Revised Cover Installation Plan approved by EPA on January 14, 2025.

Paragraph #	Key Action	Start Date/Deadline	Status
24	Submit a Sampling and Analysis Plan subject to EPA's approval, including a Field Sampling Plan and Quality Assurance Project Plans (QAPP).	March 27, 2024; November 15, 2024; ongoing	Submitted Plans for EPA's approval; Submitted Second Revised Sampling and Analysis Plan and Second Revised ETLF QAPP for EPA's approval on January 23, 2025 updating Air Monitoring QAPP, which will be resubmitted to EPA within 5 days of approval by SCAQMD
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
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

Paragraph #	Key Action	Start Date/Deadline	Status
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	October 16, 2024; Ongoing
73, 75	Recertify to EPA that Chiquita's contractors and subcontractors have obtained the required insurance.	October 16, 2024; ongoing annually	Recertified at EPA's direction as of December 31, 2024.
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	February 26, 2024; ongoing	Ongoing

Paragraph #	Key Action	Start Date/Deadline	Status
	insurance for all persons performing Work.		
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
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	