

Action Items for South Coast Air Quality Management District

Case No. 6177-4 Stipulated Order for Abatement (modified on August 27, 2024)

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 |
| 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 |
| 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 |
| 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 |

| Condition No. | Key Action | Start Date/Deadline | Status |
|----------------------|--|----------------------------|---------------|
| 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 |
| 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 |
| 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 |
| 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 |

| Condition No. | Key Action | Start Date/Deadline | Status |
|---------------|---|---------------------|-----------|
| 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 |
| 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 |
| 59 | Submit expedited permit modification application for Landfill Gas Condensate and Leachate Treatment System for hazardous waste treatment | 6/21/2024 | Completed |
| 66(a) | Finalize contracts to install and operate remote well pressure and temperature monitoring system | 6/21/2024 | Completed |

| Condition No. | Key Action | Start Date/Deadline | Status |
|----------------------|--|---|---------------|
| 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 |
| 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 |

| Condition No. | Key Action | Start Date/Deadline | Status |
|----------------------|--|----------------------------|---------------|
| 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 |
| 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 |

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 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 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 as 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 |

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| 8 | Submit monthly written report to South Coast AQMD | 9/30/2023; modified 8/27/2024; monthly | Ongoing; posted on Chiquita's website |
| 9 | Conduct integrated landfill surface sampling | 9/20/2023; modified 8/27/2024; 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; 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 |
| 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 |

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|---------------|--|----------------------|--|
| 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 |
| 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 |

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|---------------|--|--|--|
| 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 |
| 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 |
| 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 |

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| 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 |
| 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 |
| 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 | 1/18/2024; ongoing | Ongoing |

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| | elevated temp wells as agreed upon with the LEA | | |
| 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 | 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; 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 with missing or affected data and the reason for the missing or affected data | 3/29/2024; ongoing | Ongoing |
| 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 |

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| 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-exempt Rule 1150 excavation activities until final approval of Rule 1150 landfill excavation plan | 1/18/2024; as needed | Ongoing |
| 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 |

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|---------------|--|----------------------|---------|
| 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 |
| 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 | 4/25/2024; ongoing | Ongoing |

| Condition No. | Key Action | Start Date/Deadline | Status |
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| | within 1 business day of updates going into effect | | |
| 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 |
| 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(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 |

| Condition No. | Key Action | Start Date/Deadline | Status |
|---------------|--|---|---|
| 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 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 | 8/28/2024; as needed | Ongoing; see Condition 8 monthly reports |
| 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; 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 west slope excavation activities | 9/3/2024; 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 | 8/28/2024; until approval of the leachate | Ongoing |

| Condition No. | Key Action | Start Date/Deadline | Status |
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| | equipment onsite and provide to South Coast AQMD upon request | treatment/storage permits | |
| 86(c) | The operation of the equipment must not result in the release of any raw landfill gas, or discharge of odorous liquid vapors into the atmosphere, except for when collecting samples from leachate treatment equipment | 8/28/2024; until approval of the leachate treatment/storage permits | Ongoing |
| 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 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 | 8/28/2024; until approval of the leachate | Ongoing |

| Condition No. | Key Action | Start Date/Deadline | Status |
|---------------|---|---|---------|
| | handling tanks installed pursuant to Condition No. 72(e), and any other equipment associated with the treatment or storage process | treatment/storage permits | |
| 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 |

Future Actions

| Condition No. | Key Action | Start Date/Deadline | Status |
|---------------|--|-------------------------|--------|
| 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 | |
| 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 | |
| 76 | Install sampling ports on all equipment onsite that requires sampling to prevent unnecessary fugitive emissions from sampling activities | 12/2/2024 | |
| 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 | |
| 78 | Inspect the sheeting/membrane liner twice daily, at the beginning and end of the day | 12/25/2024; twice daily | |
| 78 | Maintain the sheeting/membrane liner free of tears, rips, etc. | 12/25/2024; ongoing | |

| Condition No. | Key Action | Start Date/Deadline | Status |
|----------------------|--|--|--------|
| 78 | Record liner inspection and maintenance records | 12/25/2024; daily | |
| 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 | |
| 15(b), 15(b)(iii) | 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 | |
| 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(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 | |
| 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 | |
| 12(i) | Conduct quarterly flux chamber studies | Quarter Four 2024; once every four months thereafter | |
| 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 protocol, whichever is later | |
| 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 | |
| 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 | 8/17/2026 | |

| Condition No. | Key Action | Start Date/Deadline | Status |
|---------------|---|---|--------|
| | well installation density in the Condition 9(a) Reaction Area | | |
| 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 | |
| 15(m) | Submit semi-annual as-built drawings in duplicate to South Coast AQMD | Semi-annually | |
| 27(f) | Implement SOPs for leachate tank operations in tank farm areas | Within 7 days of South Coast AQMD approval of the SOPs | |
| 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 recommendations on further | No later than 150 days from South Coast AQMD approval of the proposal | |

| Condition No. | Key Action | Start Date/Deadline | Status |
|---------------|--|--|--------|
| | deployment of the remote monitoring system | | |
| 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(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(c) | Submit a recommendation on additional vapor flow testing | Within 30 days of submission of the source test report | |
| 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 | |