



CHIQUITA CANYON

A Waste Connections Company

February 27, 2026

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 January 2026. This letter serves as Chiquita's monthly update for February 2026.

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

Safety Code (“HSC”) § 41700 dated from February 1 through February 25, 2026. Copies of these NOV’s are provided in Attachment A.

- On February 25, 2026, the Department of Toxic Substances Control (“DTSC”) issued Chiquita a Summary of Violations (“SOV”) for alleged violations of 22 California Code of Regulations (“CCR”) § 66262.251 and HSC §§ 25163(a)(1) and 25189.2(b). A copy of this SOV is provided in Attachment B.

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 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 C. Detailed information on Chiquita’s implementation of the Local Enforcement Agency’s (“LEA”) June 6, 2024 and May 1, 2025 Compliance Orders can be found in the chart provided in Attachment D. Detailed information on Chiquita’s implementation of the U.S. Environmental Protection Agency’s (“EPA”) February 21, 2024 Unilateral Administrative Order (“UAO”) can be found in the chart provided in Attachment E. Detailed information on Chiquita’s implementation of the DTSC April 2, 2025 Imminent and Substantial Endangerment (“ISE”) Order can be found in the chart provided in Attachment F.

On October 2, 2025, PW requested that these monthly updates include status updates on the NOV’s issued by PW and DRP on June 26, 2025 and July 14, 2025, respectively. This letter provides additional details regarding the PW and DRP NOV’s, as applicable.

June 2020 DRP NOV

In October 2022, Chiquita reached a settlement agreement with the County of Los Angeles (the “County”), which included terms affecting CUP Conditions 77 and 79. The hearing on the June 2020 NOV was stayed as a result of the settlement agreement. Chiquita will continue to work cooperatively with the County on addressing the underlying issues.

SCAQMD Rule 402 NOVs

The SCAQMD Rule 402 NOV’s were issued due to odors that allegedly emanated from the Chiquita Canyon Landfill (the “Landfill”). Any odors coming from the Landfill are related to an abnormal biotic or abiotic process (also known as a landfill reaction) taking place deep within a lined, but older and inactive 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/>.

On September 6, 2023, Chiquita entered into a Stipulated Order with SCAQMD to address the NOV’s issued by SCAQMD inspectors as a result of the landfill reaction, alleging violations of

SCAQMD Rule 402 and HSC § 41700. This Stipulated Order has since been modified eight times, including most recently on December 9, 2025.¹

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

February 25, 2026 DTSC SOV

On February 25, 2026, Chiquita received an SOV from DTSC alleging violations of 22 CCR § 66262.251 and HSC §§ 25163(a)(1) and 25189.2(b). The SOV specifically alleges that Chiquita: (1) "failed to minimize the possibility of a release of hazardous waste or hazardous waste constituents to air, soil or surface water which could threaten human health or the environment"; and (2) "transferred custody of hazardous waste and/or condensate to . . . transporters who did not hold a valid registration issued by DTSC." Chiquita is evaluating the alleged violations and can provide further explanation in follow-up reporting as appropriate.

June 26, 2025 PW NOVs (Accessor's IDs #3271-002-013, #3271-002-019, and #3271-002-041)

On June 26, 2025, Chiquita received three NOVs from PW alleging that Chiquita had engaged in grading without obtaining a grading permit in accordance with the Los Angeles County Code. Chiquita appealed these NOVs to PW on August 28, 2025. The appeal states all three NOVs are unsupported and should be rescinded. Chiquita did not violate the County Building Code, it applied for a grading permit from PW in good faith cooperation with the County, and PW's permitting requirements are preempted by state law. As of February 27, 2026, Chiquita's appeal has not yet been set for a hearing, and Chiquita has not received a response to its appeal.

July 14, 2025 DRP NOV (Code Enforcement Case No. RPZPE2025004826)

On July 14, 2025, Chiquita received an NOV from DRP alleging violations of CUP Conditions 12, 54, and 56. Chiquita appealed this NOV to DRP on September 12, 2025. The appeal states DRP's NOV is based entirely on PW's June 26, 2025 NOVs, referenced above, and because the PW NOVs are unwarranted, DRP's NOV is unsupported and should be rescinded. Chiquita has not violated CUP Conditions 12, 54, or 56, and DRP's NOV is unnecessarily punitive and violates Chiquita's due process rights. A hearing before a DRP Hearing Officer is set for May 5, 2026.

¹ A copy of the December 9, 2025 Stipulated Order is provided in Attachment G.

Integrated Waste Management Task Force
c/o Los Angeles County Public Works
February 27, 2026
Page 4 of 4

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

Regards,



Kevin Green
District Manager
Chiquita Canyon Landfill

Attachments: A – Rule 402 NOVs from SCAQMD
B – February 25, 2026 DTSC SOV
C – Chart of Chiquita’s Implementation of the SCAQMD Stipulated Order
D – Chart of Chiquita’s Implementation of the LEA’s 2024 and 2025
Compliance Orders
E – Chart of Chiquita’s Implementation of the EPA UAO
F – Chart of Chiquita’s Implementation of the DTSC ISE Order
G – December 9, 2025 South Coast AQMD Stipulated Order

cc: David Nguyen, Public Works
Karlo Manalo, Public Works
John Perkey, Chiquita Canyon
Dylan Smith, Chiquita Canyon
Sarah Phillips, Chiquita Canyon

ATTACHMENT A



NOTICE OF VIOLATION

DATE OF VIOLATION		
Month:	Day:	Year:
2	1	26

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

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

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

DESCRIPTION OF VIOLATIONS

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

Served To: Kevin Green	Phone: 661-812-5846	Served By: Christina Ojeda	Date Notice Served: 2-1-26
Title: district manager	Email: Kevin.Green@WasteConnectors.com	Phone No: <input checked="" type="checkbox"/> 909-396-2475 <input type="checkbox"/> 310-233-	Email: cojeda@aqmd.gov

*Key to Authority Abbreviations:
 SCAQMD – South Coast Air Quality Management District
 CH&SC – California Health and Safety Code
 CCR – California Code of Regulations
 CFR – Code of Federal Regulations

Method of Service: **email**
 In Person Certified Mail



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

P 73587

NOTICE OF VIOLATION

DATE OF VIOLATION		
Month	Day	Year
02	02	26

Facility Name CHIQUITA CANYON LLC	Facility ID# 179219	Sector VB
Location Address 29201 HENRY MAYO DR	City CASTAIC	Zip 91384
Address 29201 HENRY MAYO DR	City CASTAIC	Zip 91384

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DESCRIPTION OF VIOLATIONS

#	Authority*	Code Section or Rule No.	SCAQMD Permit or Operator or CARS Registration No.	Condition No. (if Applicable)	Description of Violation
1	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CHASC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	Rule 402			for discharging such quantities of air contaminants to cause injury, detriment, nuisance or annoyance to a considerable number of persons
2	<input type="checkbox"/> SCAQMD <input checked="" type="checkbox"/> CHASC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	Ch SC 419D			for discharging such quantities of air contaminants to cause injury, detriment, nuisance or annoyance to a considerable number of persons
3	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CHASC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
4	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CHASC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
5	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CHASC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				

By: SARA PHILLIPS District Compliance Manager	Print Name: SARA PHILLIPS Phone: 909-398-2682	By: BILLY ANTONIO	Date Notice Sent: 02/02/2026
Signature: <i>[Signature]</i>	Phone: 909-398-2682 310-233-	Email: bantoino@aqmd.gov	
*By Authority Abbreviations: SCAQMD - South Coast Air Quality Management District CHASC - California Health and Safety Code CCR - California Code of Regulations CFR - Code of Federal Regulations		Method of Service: <input type="checkbox"/> In Person <input checked="" type="checkbox"/> Certified Mail	

ORIGINAL



NOTICE OF VIOLATION

DATE OF VIOLATION		
Month:	Day:	Year:
02	06	2026

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

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

DESCRIPTION OF VIOLATIONS

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

Served To: Kevin Green	Phone: 661-812-5846	Served By: Daniel Rosas	Date Notice Served: 02/06/2026
Title: District Manager	Email: kevin.green@wasteconnections.com	Phone No: <input checked="" type="checkbox"/> 909-396-2080 <input type="checkbox"/> 310-233-	Email: drosas@aqmd.gov

*Key to Authority Abbreviations:

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

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

Method of Service:

In Person Certified Mail

electronic mail

ORIGINAL



NOTICE OF VIOLATION

DATE OF VIOLATION		
Month	Day	Year
02	25	2026

Facility Name Chiquita Canyon Landfill		Facility ID# 119219	Issue VI3
Location Address 29201 Henry Mayo Dr		City Castaic	Zip 91384
Mailing Address 29201 Henry Mayo Dr		City Castaic	Zip 91384

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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

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1	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	Rule 402			For discharging such quantities of air contaminants to cause injury, detriment, nuisance or annoyance to a considerable number of persons
2	<input type="checkbox"/> SCAQMD <input checked="" type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	California H&S Code Sec 41700			
3	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
4	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
5	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				

Served To: Kevin Green	Phone: 661-812-5886	Served By: Daniel Fosas	Date Notice Served: 02/25/2026
Title: District Manager	Email: Kevin.green@wasteconnections.com	Phone No: <input checked="" type="checkbox"/> 909-396-2080 <input type="checkbox"/> 310-233-	Email: drosas@aqmd.gov

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

& electronic mail

ATTACHMENT B



Yana Garcia
Secretary for
Environmental Protection



Department of Toxic Substances Control

Katherine M. Butler, MPH, Director
7575 Metropolitan Drive, Suite 108
San Diego, California 92108

<https://dtsc.ca.gov/>



Gavin Newsom
Governor

SUMMARY OF VIOLATIONS

On and/or before February 25, 2026, the California Environmental Protection Agency, Department of Toxic Substances Control (DTSC), reviewed documentation related to:

Facility Name: Chiquita Canyon, LLC; Chiquita Canyon, Inc.; Waste Connections US, Inc.
Facility Address: 29201 Henry Mayo Dr., Castaic, CA 91384
EPA ID Number: CAL000347030, CAR000381574 **County:** Los Angeles

As a result of DTSC’s investigation, DTSC discovered violations of the California Hazardous Waste Control Law (HWCL) and its implementing regulations that are identified on the attached pages. You must correct the following violations within the schedule for compliance for each violation. If you disagree with the alleged violations listed in this Summary of Violations, you must inform DTSC in writing. If additional violations existed or have existed which are not included in this Summary of Violations, such violations, if any, may be the subject of an amended or separate Summary of Violations and DTSC reserves all rights with respect to such violations.

You may request a meeting with DTSC to discuss the investigation or this Summary of Violations. The issuance of this Summary of Violations does not preclude DTSC from taking administrative and/or civil action or from referring the matter for criminal prosecution as a result of the violations identified herein or violations that have not been corrected within the time specified by DTSC. Failure to comply with a schedule for compliance, including without limitation the schedule of compliance in this Summary of Violations, is a violation of the law and is subject to a civil penalty of up to \$70,000 for each day of noncompliance. In addition, a false statement that compliance has been achieved is a violation of the law and is subject to a penalty of up to \$70,000 for each occurrence. DTSC may re-investigate this facility at any time.

Facility Representative Accepting
Summary of Violations

DTSC Representative

Name: _____
Signature: _____
Title: _____
Date: _____

Name: Erin Neal
Signature: *Erin Neal*
Title: Senior Environmental Scientist
Date: 2/25/2026



Department of Toxic Substances Control
7575 Metropolitan Drive, Suite 108
San Diego, CA 92108

SUMMARY OF VIOLATIONS

Facility Name: Chiquita Canyon, LLC; Chiquita Canyon, Inc.; Waste Connections US, Inc. **Date:** 2/25/2026

SECTION I: NON-MINOR VIOLATIONS AND REQUIRED CORRECTIVE ACTION

You must correct the following violations within the specified time frame for each violation.

Violation # 1

Violation Citation:

California Code of Regulations (Cal. Code Regs.), tit. 22, § 66262.251, A large quantity generator shall maintain and operate its facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

Relevant Citation:

Health and Safety Code (HSC) § 25189.2(b), Except as provided in subdivision (c) or (d), a person who violates a provision of this chapter or a permit, rule, regulation, standard, or requirement issued or adopted pursuant to this chapter, is liable for a civil penalty not to exceed seventy thousand dollars (\$70,000) for each violation of a separate provision or, for continuing violations, for each day that the violation continues.

Description:

On and/or before February 14, 2026, Chiquita Canyon Landfill (CCL) failed to minimize the possibility of a release of hazardous waste or hazardous waste constituents to air, soil or surface water which could threaten human health or the environment. The accounts of these incidents are described in reports posted on CCL's website (<https://chiquitacanyon.com/odor-mitigation/>) and the California Governor's Office of Emergency Services (CalOES) Spill Release Reporting Dashboard (<https://www.caloes.ca.gov/office-of-the-director/operations/response-operations/fire-rescue/hazardous-materials/spill-release-reporting/>), attached to this Summary of Violations (SOV) as Exhibit A. Additionally, DTSC requested clarification on specific release reports, CCL's responses are attached to this SOV as Exhibit B.



Department of Toxic Substances Control

7575 Metropolitan Drive, Suite 108
San Diego, CA 92108

The individual releases that form the basis for this Violation #1 are attached as counts 1 – 49 in Exhibit C.

Violation Classification:

These are class 1 violations.

Compliance Requirement:

CCL shall operate its facility in a manner that minimizes the possibility of a sudden or non-sudden release of hazardous waste or hazardous waste constituents.

In accordance with DTSC's June 20, 2025 compliance requirement letter, CCL shall continue to send the following agency reports to DTSC: South Coast Air Quality Management District Stipulated Order for Abatement (AQMD SOFA) Condition 27(e) Spill/Leak Reports, AQMD SOFA Condition 27(c) Leachate Inspection Logs, Waterboard 7-Day Waste Discharge Requirements (WDR) Reports, and Waterboard 30-Day Storm Event Reports.

In lieu of a separate Release Notification to DTSC, to the extent reasonably possible, CCL shall include in these agency reports the following additional information: the estimated release cleanup time and a waste determination identifying if the release is hazardous, treated non-hazardous, or characteristically non-hazardous. If applicable to the release, CCL shall also make good faith efforts to include the tank number, well number, and train identification associated with the release. If photographs are taken for a release, these shall either be included in AQMD's report or provided to DTSC separately within 72 hours of the release. If a release is sampled, all sampling results shall be provided to DTSC within 48 hours of CCL receiving these results.

Violation # 2

Violation Citation:

HSC 25163(a)(1), Except as otherwise provided in subdivisions (b) to (f), inclusive, it is unlawful for a person to carry on, or engage in, the transportation of hazardous waste unless the person holds a valid registration issued by the department, and it is unlawful for a person to transfer custody of a hazardous waste to a transporter who does not hold a valid registration issued by the department. A person who holds a valid registration issued by the department pursuant to this section is a registered hazardous waste transporter for purposes of this chapter. A registration issued by the department to a transporter of hazardous waste is not transferable from the person to whom it was issued to any other person.



Department of Toxic Substances Control

7575 Metropolitan Drive, Suite 108
San Diego, CA 92108

Relevant Citation:

HSC § 25189.2(b), Except as provided in subdivision (c) or (d), a person who violates a provision of this chapter or a permit, rule, regulation, standard, or requirement issued or adopted pursuant to this chapter, is liable for a civil penalty not to exceed seventy thousand dollars (\$70,000) for each violation of a separate provision or, for continuing violations, for each day that the violation continues.

Description:

On and/or before February 4, 2026, CCL transferred custody of hazardous waste leachate and/or condensate to two transporters who did not hold a valid registration issued by DTSC: Action Resources LLC (EPA ID: ALR000007237) and Action Environmental LLC (EPA ID: ALR000056689).

From February 26, 2024 to February 4, 2026, CCL transferred custody of hazardous waste on at least 2,165 hazardous waste manifests to EPA ID ALR000007237, identified on the manifests as Action Resources Incorporated. The EPA ID ALR000007237 is issued to Action Resources LLC. The hazardous waste transporter registration for Action Resources LLC (DTSC Transporter Registration #6620) expired on June 30, 2023. Action Resources LLC did not hold a valid registration with DTSC as a hazardous waste transporter from February 26, 2024 to February 4, 2026. Action Resources LLC's DTSC transporter registration was reinstated effective February 17, 2026 and expires on February 28, 2027.

From November 4, 2024 to September 18, 2025, CCL transferred custody of hazardous waste on at least 15 hazardous waste manifests to EPA ID ALR000056689, identified on the manifests as Action Environmental LLC. The EPA ID ALR000056689 is issued to Action Environmental LLC. DTSC was unable to locate records of Action Environmental LLC as a registered hazardous waste transporter. Action Environmental LLC did not hold a valid registration with DTSC as a hazardous waste transporter from November 4, 2024 to September 18, 2025.

Violation Classification:

This is a class 1 violation.

Compliance Requirement:

CCL shall discontinue transferring custody of hazardous waste to transporters that do not hold a valid registration issued by DTSC. Within 10 days of this SOV, CCL shall provide confirmation in writing that all transporters used by CCL to transport hazardous



Department of Toxic Substances Control

7575 Metropolitan Drive, Suite 108
San Diego, CA 92108

waste within, into, out of, or through California are DTSC-registered hazardous waste transporters.

DTSC registered transporter database: <https://hwts.dtsc.ca.gov/transporters/>.

SECTION II: OTHER ISSUES/CONCERNS

The following issues/concerns were identified during this investigation. Further research may identify additional violations.

1. Additional releases of leachate and/or condensate have occurred at CCL. These incidents have not been identified as violations at this time; however, DTSC is concerned that these incidents demonstrate general leachate mismanagement on-site. The incidents are described in reports posted on CCL's website (<https://chiquitacanyon.com/odor-mitigation/>) and the CalOES Spill Release Reporting Dashboard (<https://www.caloes.ca.gov/office-of-the-director/operations/response-operations/fire-rescue/hazardous-materials/spill-release-reporting/>), attached to this SOV as Exhibit D. Additionally, DTSC requested clarification on specific release reports, CCL's responses are attached to this SOV as Exhibit B. These incidents are also summarized in the attached table (Exhibit E).
2. Recent hazardous waste manifests continue to include a phone number that appeared to be assigned to Steve Cassulo. DTSC was notified that Steve Cassulo left his position with Chiquita Canyon as of November 30, 2025. Please ensure that the generator's phone number listed in Item 12 of the hazardous waste manifest is current going forward.
3. On January 23, 2026, DTSC sent a letter of non-compliance regarding Violation #3 of DTSC's SOV issued to CCL on November 18, 2025. The violation was issued for the failure to properly label hazardous waste tanks/containers. CCL has not provided a response to this letter and has not provided adequate documentation to show that it has met the compliance requirement for this violation. DTSC may consider each day that CCL is not in compliance as separate instances of violation in any subsequent enforcement action. DTSC reiterates that CCL must adequately label their hazardous waste and demonstrate to DTSC their return to compliance meets the requirements of 22 CCR §66262.17(a)(5).



Department of Toxic Substances Control

7575 Metropolitan Drive, Suite 108
San Diego, CA 92108

ATTACHMENTS:

Exhibit A: Violation #1 Supporting Documents (contains CalOES reports, CCL's South Coast AQMD Abatement Order reports, and CCL's Los Angeles Water Board reports)

Exhibit B: DTSC Information Requests Regarding Release Notifications

Exhibit C: Table 1 – Violation #1 Counts

Exhibit D: Other Issues/Concerns #1 Supporting Documents (contains CalOES reports, CCL's South Coast AQMD Abatement Order reports, and CCL's Los Angeles Water Board reports)

Exhibit E: Table 2 – Other Issues/Concerns #1 – Incidents

Exhibit F: CCL's Summary of Leachate Leaks and Spills from September 4, 2024 to February 10, 2026

ATTACHMENT C

Action Items for South Coast Air Quality Management District

Case No. 6177-4 Stipulated Order for Abatement (chart modified on February 27, 2026)

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

Condition No.	Key Action	Start Date/Deadline	Status
32	Submit report on air dispersion modeling	12/1/2023	Completed
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	3/15/2024	Completed

Condition No.	Key Action	Start Date/Deadline	Status
	report and continue implementing dewatering guidelines		
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; updated 9/4/2025 and 1/26/2026	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

Condition No.	Key Action	Start Date/Deadline	Status
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
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; no longer applicable since there are no longer external waste disposal operations	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	5/21/2024	Completed

Condition No.	Key Action	Start Date/Deadline	Status
	combustion vapor from treatment system		
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
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	7/10/2024	Completed

Condition No.	Key Action	Start Date/Deadline	Status
	venting the leachate tanks until pressure gauges are installed		
72(b)	Resubmit source test protocol for vapor flow testing	7/12/2024	Completed
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 any other equipment associated with the treatment or storage process	7/14/2024	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 H2S or other speciated sulfur compounds and other HAPs	8/1/2024	Completed
85(a)	Operate perimeter odor control misters along the west slope excavation area	8/28/2024; during the west slope excavation project	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(c)	Submit weekly reports on activities related to the west slope excavation project and the toe drain termination project	9/3/2024	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,	9/17/2024	Completed

Condition No.	Key Action	Start Date/Deadline	Status
	implementation, installation, and specification issues/concerns		
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

Condition No.	Key Action	Start Date/Deadline	Status
86(c)	Prepare and submit a schematic of the leachate treatment equipment, showing where the sampling ports are located	11/1/2024	Completed
34(c)	Third party must put automatic electronic notification system for the ambient air monitoring into effect	11/4/2024	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
13	Continue to operate the two sumps with pumps along the west slope; as new landfill gas wells are completed, begin operating them	12/4/2024	Completed
88(b)	Install backup power at the Zeeco TOX	12/5/2024	Completed
81(c)	Deploy the downtime notification system	12/10/2024	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	12/24/2024	Completed
88(a)	Complete the connection of the flare station to permanent grid power	12/31/2024	Completed
31	Install a geosynthetic cover over western portions of the Module 2B/3/4 Phase 2, Module 2B/3, and Module 4 to limit the migration of the landfill gas from the site. Notify South Coast AQMD on progress of procuring and installing cover	Initial notification on 10/31/2023; monthly updates until installation complete; installation completed on January 3, 2025	Completed

Condition No.	Key Action	Start Date/Deadline	Status
43	Maintain fresh trash odor mitigation measures during Unfavorable Wind Conditions	1/1/2025; no longer applicable since there are no longer external waste disposal operations	Completed
43(f)	If trash-based odors are detected during Condition 1(f) odor surveillance, deploy additional orchard fans to working face and surrounding area	1/1/2025; no longer applicable since there are no longer external waste disposal operations	Completed
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	1/1/2025; no longer applicable since there are no longer external waste disposal operations	Completed
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,	1/31/2025	Completed

Condition No.	Key Action	Start Date/Deadline	Status
	including assessment of multiple depths within the well		
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 related data and the general findings of the study and a proposed scope for a continuation of the study	3/31/2025	Completed
36(c)	Ensure the microGCs at MS-10 and MS-12 are capable of measuring hourly concentrations of acrolein	4/16/2025	Completed
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	4/16/2025 for new tank farms	Completed
95	Submit a permit modification application for the Landfill Gas and Leachate Collection/Storage System to increase the liquid storage capacity and include the new temporary tank farm located in Canyon D	4/30/2025	Completed
96	Update prior estimates of current and projected landfill gas generation prepared pursuant to Condition No. 70	4/30/2025	Completed
72(c)	May submit further recommendations from the Reaction Committee on additional vapor flow testing	5/16/2025	Completed
94	Submit a permit application for the additional landfill gas combustion/control unit brought on-site in February 2025	5/30/2025	Completed
93	Ensure hydrostatic liquid level transmitters are installed in all leachate storage tanks capable of having such transmitters installed in them	6/30/2025	Completed

Condition No.	Key Action	Start Date/Deadline	Status
69	Submit a recommendation as to modifying the frequency of piping monitoring	7/31/2025	Completed
75	Reaction Committee to submit proposal to assess the viability and functionality of adding gas flow rate and composition as monitoring parameters to at least 5 remote monitoring units installed on the select wells	Submitted 8/29/2025; revised in response to South Coast AQMD comments on 9/19/2025	Completed
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	9/30/2025 for existing tank farms	Completed
75	Procure, install, and begin operating remote monitoring units on 21 wellheads and 5 landfill gas headers. All units must monitor for temperature, pressure, and vacuum. Units installed on wells without pumps must also monitor for liquid levels	10/31/2025	Completed
75(a)	Submit notice of completed installation and operational start of the RMS	11/3/2025	Completed
75(g)	Grant AQMD read and download access to the RMS data	11/3/2025	Completed
63	Submit a schematic of the current leachate treatment system and leachate storage system	12/16/2025	Completed
34(c)	Revise the automatic air monitoring exceedance notification system to provide a notification every hour during which the applicable time weighted average continues to be above the applicable REL	12/31/2025	Completed
34(c)(i)	Retain a third-party to develop a system that allows for the automatic air monitoring exceedance notification system defined in Condition No. 34(c) to provide notifications via text message	12/31/2025	Completed
34(e)	Retain sufficient third-party support to ensure that all CH ₄ , H ₂ S, PM, and	12/31/2025	Completed

Condition No.	Key Action	Start Date/Deadline	Status
	meteorological sensors meet data quality objectives identified by the instrument vendor or outlined in the standard operating procedures or quality assurance documentation and are maintained, calibrated, and replaced in accordance with the instruments' standard operating procedures or quality assurance documentation		
34(f)	Retain sufficient third-party support to ensure that all microGC instruments meet data quality objectives identified by the instrument vendor or outlined in the standard operating procedures or quality assurance documentation; and are maintained, calibrated, and replaced in accordance with the instruments' standard operating procedures or quality assurance documentation.	12/31/2025	Completed
102	Submit a complete permit modification application for the Landfill Gas Condensate and Leachate Collection/Storage System for the removal of Tank Farm 9, and relocation, construction, and operation of tanks in Tank Farm 13	12/31/2025	Completed
103	Submit a complete permit application for the hazardous and/or non-hazardous liquid treatment system constructed and operating in Tank Farm 13	12/31/2025	Completed
27(f)(i)	Revise SOPs developed under Condition No. 27(f) to include instructions for leachate tanker truck operations, as applicable	1/9/2026	Completed
27(f)(i)	Implement revised SOPs developed under Condition No. 27(f)	1/9/2026	Completed
100	Submit a feasibility assessment proposal to assess the viability and functionality of a leachate vapor recovery and control system to recover leachate vapors during loading of liquid/leachate into the leachate tanker trucks and control	1/16/2026	Completed

Condition No.	Key Action	Start Date/Deadline	Status
	the recovered vapors either in Chiquita's existing landfill gas control system or in a new or modified system		
83(a)	Conduct a continued study of specific landfill operational events and their potential emission impacts; prepare and submit report detailing the landfill operational events, data, and study findings	1/30/2026	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 and 12/9/2025; 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
2	Log odor surveillance notifications and actions taken in response	9/7/2023; ongoing	Ongoing
2	Make Odor Surveillance Logs available for inspection	9/7/2023; ongoing; as requested	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

Condition No.	Key Action	Start Date/Deadline	Status
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, 4/16/2025, 6/24/2025, and 12/9/2025; monthly	Ongoing
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
9(b)	Submit monthly Reaction Area boundary determinations	10/6/2023; modified 11/13/2024, 4/16/2025, and 6/24/2025; 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 SO _x 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	Provide new Reaction Committee member information to South Coast AQMD	As needed	Ongoing

Condition No.	Key Action	Start Date/Deadline	Status
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
12(h)	Post all expert reports prepared pursuant to Condition 12 on Odor Mitigation webpage	9/7/2023; ongoing	Ongoing
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 flux chamber studies	Quarter Four 2024; once every four months thereafter	Ongoing
12(i)	Submit 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	Ongoing
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	Ongoing
12(i)	Notify South Coast AQMD of flux chamber test date for each test	At least 14 days prior to the scheduled test	Ongoing
13	Expand gas well system	9/7/2023; 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

Condition No.	Key Action	Start Date/Deadline	Status
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 measures 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; as needed	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; as needed	Ongoing
15(b)(vi)	Extensions to the well installation timelines under Condition 15(b)(iv) and (v) may be requested in writing	8/28/2024; at least 7 days prior to the 30-day well installation deadline	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

Condition No.	Key Action	Start Date/Deadline	Status
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	1/18/2024; 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
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;	9/7/2023; ongoing	Ongoing

Condition No.	Key Action	Start Date/Deadline	Status
	notify South Coast AQMD within 48 hours of determination		
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
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

Condition No.	Key Action	Start Date/Deadline	Status
27(e)	Report leachate leaks or spills to South Coast AQMD within 48 hours of discovery	8/28/2024; modified 4/16/2025; as needed	Ongoing
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, and any additional geosynthetic cover installed on site; 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; modified 6/24/2024; ongoing	Ongoing; see Condition 8 monthly reports
30	Any repair of the geosynthetic cover which includes addition of new material must be done using an EVOH of at least 60-mil thickness, or, if EVOH is unavailable and repair is on or before three months from the date DTSC approves the EVOH, an HDPE membrane of at least 60-mil thickness	6/25/2025; ongoing	Ongoing

Condition No.	Key Action	Start Date/Deadline	Status
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 fence-line 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 with missing or affected data and the reason for the missing or affected data	3/29/2024; ongoing	Ongoing
34(c)	Ensure the template for all automatic air monitoring exceedance notifications are	12/10/2025; ongoing	Ongoing

Condition No.	Key Action	Start Date/Deadline	Status
	written in coordination with and approved by South Coast AQMD		
34(d)	Investigate any measurement which results in an exceedance notification as defined in Condition No. 34; submit a preliminary report of the investigation and findings within 1 business day; submit full documentation of the investigation within 4 business days	12/10/2025; ongoing	Ongoing
34(e)	For any measurement that results in an exceedance notification pursuant to Condition No. 34, the entity/ies retained under Condition No. 34(e) must provide instrument data and a data validation/invalidation recommendation to Chiquita	12/31/2025; ongoing	Ongoing
34(f)	For any measurement that results in an exceedance notification pursuant to Condition No. 34, the entity/ies retained under Condition No. 34(f) must provide instrument data and a data validation/invalidation recommendation to Chiquita	12/31/2025; 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
35(a)	Provide South Coast AQMD list of appropriate PPE within 24 hours of request	1/18/2024; as needed	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

Condition No.	Key Action	Start Date/Deadline	Status
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
40	Host community information meetings monthly based on receipt of NOVs	9/14/2023; ongoing	Ongoing
42	Implement additional mitigation measures while conducting non-exempt Rule 1150 excavation activities until final approval of Rule 1150 landfill excavation plan	1/18/2024; 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
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	8/28/2024; as needed	Ongoing

Condition No.	Key Action	Start Date/Deadline	Status
	6:00am and 11:00am, and at least once between the hours of 2:00pm and 6:00pm		
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; as needed	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; as applicable	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; modified 12/9/2025; monthly beginning 12/22/2025	Ongoing; see Condition 8 monthly reports
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

Condition No.	Key Action	Start Date/Deadline	Status
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(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	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; as applicable	Ongoing
74	Expedite the procurement of the equipment needed to construct Flare No. 4	8/28/2024; ongoing	Ongoing
75(h)-(j)	Maintain onsite records documenting actions performed to resolve issues as a result of the RMS; inspection and maintenance activities; and equipment downtime. Provide upon request	10/31/2025; ongoing; as requested	Ongoing
76	Install sample ports on new equipment brought on site that requires sampling	8/28/2024; as needed	Ongoing
77	Conduct aerial surveillance monitoring over the Reaction Area; conduct follow-up field inspections as needed within 2	6/25/2025; weekly	Ongoing

Condition No.	Key Action	Start Date/Deadline	Status
	hours of becoming aware of aerial surveillance exceedances; implement corrective actions as needed within 2 calendar days		
77	Conduct aerial surveillance monitoring over entire landfill surface; conduct follow-up field inspections as needed within 2 hours of becoming aware of aerial surveillance exceedances; implement corrective actions as needed within 2 calendar days	6/25/2025; monthly	Ongoing
77	Provide raw data used to create the documents required by Condition 77	12/10/2025; ongoing within 5 working days of request	Ongoing
77	Develop and submit maps of aerial surveillance monitoring data and additional required information in monthly Condition 8 reports	6/25/2025; modified 12/9/2025; ongoing in monthly reports	Ongoing; see Condition 8 monthly reports
78	Inspect the sheeting/membrane liners under the tanks twice daily, at the beginning and end of the day	4/17/2025; twice daily	Ongoing
78	Maintain the sheeting/membrane liners under the tanks free of tears, rips, etc.	4/17/2025; ongoing	Ongoing
78	Record inspection and maintenance records for liners under the tanks	4/17/2025; ongoing	Ongoing
78	Once the 60-mil geosynthetic liner is installed, inspect it at least twice-daily; record inspection and maintenance records	Modified 4/16/2025; ongoing	Ongoing
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	4/16/2025; ongoing	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

Condition No.	Key Action	Start Date/Deadline	Status
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; modified 11/13/2024; as needed	Ongoing
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 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	8/28/2024; until approval of the leachate	Ongoing

Condition No.	Key Action	Start Date/Deadline	Status
	storage processes must be fully enclosed, under vacuum, and vented to appropriate control (i.e., flare station)	treatment/storage permits	
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)	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

Condition No.	Key Action	Start Date/Deadline	Status
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	12/31/2024; 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, 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
93	Monitor and communicate leachate storage tank level information before and during tank filling operations	6/30/2025; ongoing	Ongoing
97	Visually inspect all connection points, seams, and seals of the geosynthetic cover (s) in and around the Reaction Area at least once every 7 calendar days, promptly repair any cover issues identified, and maintain a related log	4/16/2025; ongoing	Ongoing; see Condition 8 monthly reports
98(c)	Do not open any air release valve that does not have a fully installed and operational liquid and vapor collection receptacle unless otherwise approved in writing by South Coast AQMD	12/10/2025; ongoing until liquid and vapor collection receptacle is installed	Ongoing
98(d)	Inspect air release valves and associated liquid and vapor collection receptacles; repair all leaks within 1 day of detection; and maintain inspection records	12/10/2025; ongoing at least once every 14 days	Ongoing
99	All liquid/leachate transfers between stationary leachate storage tanks and	12/21/2026; ongoing	Ongoing

	leachate tanker trucks shall be performed via bottom loading to the maximum extent feasible		
101	Deposit all construction spoils at an appropriate disposal site within 1 hour of generation	12/10/2025; ongoing	Ongoing

Future Actions

Condition No.	Key Action	Start Date/Deadline	Status
36(d)	Procure an additional microGC and 2 additional sensor modules to be used as spares	3/31/2026	
36(d)	Maintain the additional microGC in operational condition and available for immediate deployment once determined that a monitoring network instrument has failed	3/31/2026; ongoing	
75(f)	Reaction Committee to conduct feasibility assessment and submit final report on results and recommendations on further RMS deployment with at least 3 months of data collection	4/17/2026	
27(f)(ii)	Review and revise the SOPs developed under Condition No. 27(f)	7/9/2026; ongoing at least every 6 months	
27(f)(ii)	Implement the revised SOPs developed under Condition No. 27(f)	7/9/2026; ongoing at least every 6 months	
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	
98	Install a passive liquid and vapor collection receptacle on all air release valves installed on the leachate/condensate piping; prioritize installing on lines which	10/30/2026	

Condition No.	Key Action	Start Date/Deadline	Status
	move characteristically hazardous liquids		
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	
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	
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)(i)	Respond and/or submit further revised SOPs under Condition No. 27(f) based on comments from South Coast AQMD	Within 15 days of receiving South Coast AQMD comments on revised Condition 27(f) SOPs	
27(f)(ii)	Respond and/or submit further revised SOPs under Condition No. 27(f) based on comments from South Coast AQMD	Within 15 days of receiving South Coast AQMD comments on revised SOPs under Condition No. 27(f)	
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)(i)	Put the text-based notification system defined in Condition No. 34(c) into effect	Within 3 business days of direction from South Coast AQMD	

Condition No.	Key Action	Start Date/Deadline	Status
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 deployment of the remote monitoring system	No later than 150 days from South Coast AQMD approval of the proposal	
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	
90	Submit a permit modification application for the Landfill Gas Condensate and Leachate Collection/Storage System	Within 30 days, or earlier, of DTSC final approval of written workplan for the permanent relocated tank farm; modified 4/16/2025 and 12/9/2025	
91	Submit a permit application for each hazardous and non-hazardous liquid treatment system	Within 30 days, or earlier, of DTSC final approval of written workplan for the permanent relocated tank farm; modified 4/16/2025 and 12/9/2025	
100	Incorporate South Coast AQMD comments, if any, on vapor recovery system feasibility assessment proposal or provide	Within 15 days of receipt of South Coast AQMD comments	

Condition No.	Key Action	Start Date/Deadline	Status
	detailed justification for not incorporating the comments		
100	Conduct the vapor recovery system feasibility assessment and submit a final report; if Chiquita determines such a system is feasible, include a workplan for the installation and operation of the leachate vapor recovery and control equipment and related installations	Within 150 days of South Coast AQMD approval	

ATTACHMENT D

Milestones Required by the June 6, 2024 Local Enforcement Agency Compliance Order

(chart modified on February 27, 2026)

Milestone #	Key Action	Start Date/Deadline	Status
1A-1	Submit a revised soil reaction break/barrier plan (SRBBP)	Superseded	The LEA issued a second Compliance Order on May 1, 2025, which, per the LEA, supersedes this Milestone 1A-1. Chiquita submitted a request for a formal appeal hearing and a petition for stay of Section 4.3 of the second Compliance Order on May 16, 2025. Chiquita's petition for stay was denied on May 20, 2025; a hearing to establish procedures for the substantive hearing occurred on August 27, 2025; the substantive hearing originally scheduled for January 2026 has been rescheduled for March 18 and April 28, 2026. The new mitigation measures are set forth in a separate chart below
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 regarding the selection of wells; 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 for installation of the initial set of temperature monitoring probes; see report on Chiquita's website
1B-2	Submit weekly temperature monitoring probe data reports	June 7, 2024; weekly, every Thursday	Ongoing; 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	No longer required	LEA is no longer requiring Chiquita to install the three TMPs described in the LEA's June 6, 2024 Compliance Order, according to LEA letter dated January 10, 2025
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; LEA approved in letter dated April 9, 2025 contingent on submittal of additional information, which Chiquita provided on May 10, 2025
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 in accordance with this milestone
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 these weekly updates on Chiquita's website, in addition to the monthly cracks and fissures summaries, monthly isopach map, and related FLIR surveys also on Chiquita's website. On September 9, 2025, Chiquita submitted the final required bi-monthly FLIR survey and analysis and requested reduction in frequency to quarterly; LEA acknowledged receipt of request on November 5, 2025
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	July 31, 2024	Completed

	extraction wells as per approved February 26, 2024 Remediation Plan for LFG Exceedance		
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 Chiquita's 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); weekly update, every Wednesday	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, 2024; additional information requested by LEA on February 21, 2025; Chiquita provided the additional information on March 14, 2025; received additional input from LEA on May 1, 2025, requiring Revised Remediation Plan by June 2, 2025; Chiquita submitted a further Revised Remediation Plan on June 2, 2025; LEA conditionally approved in letter dated August 5, 2025; Chiquita submitted response on October 1, 2025; soil vapor extraction (SVE) wells were completed as of February 13, 2026; SVE as-builts and related materials

			are in progress and are expected to be submitted as of March 13, 2026
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

Mitigation Measures Required by the May 1, 2025 Compliance Order

(chart modified on February 27, 2026)¹

Mitigation Measure	Key Action	Start Date/Deadline	Status
Section 4.1	Extend geomembrane cover and submit plan for completion, including schedule for completion	Plan due June 2, 2025; installation in progress	Subject to request for a formal appeal hearing; draft workplan submitted on June 2, 2025; LEA conditionally approved and provided comments in letter dated August 1, 2025, imposing deadline of August 18, 2025 to submit installation schedule; Chiquita responded and requested extension of deadline in letter dated August 18, 2025 in order to revise workplan in response to comments received from DTSC; revised draft workplan submitted on October 3, 2025; installation of additional cover is in progress; received LEA comments on draft workplan on November 20, 2025; Chiquita responded to LEA comments on December 15, 2025; under discussion with LEA
Section 4.1	Submit weekly status updates on the extension of the geomembrane cover	Weekly, every Friday, beginning the week after installation commences	Subject to request for a formal appeal hearing; installation has commenced and is in progress; updates are ongoing; see weekly updates on Chiquita's website

¹ As noted above, Chiquita submitted a request for a formal appeal hearing and a petition for stay of Section 4.3 of this Compliance Order on May 16, 2025. Chiquita's petition for stay was denied on May 20, 2025; the substantive hearing originally scheduled for January 2026 has been rescheduled for March 18 and April 28, 2026.

Section 4.2	Relocate Tank Farm 9 and submit workplan for relocation	Workplan due June 2, 2025; further deadlines TBD	Subject to request for a formal appeal hearing; draft workplan submitted on June 2, 2025; revised workplan submitted on September 19, 2025 in response to comments received from DTSC; received LEA comments on draft workplan on November 20, 2025; under discussion with LEA
Section 4.3	Submit as-built for soil barrier or a workplan for construction of a vertical barrier to prevent expansion of SET event into Cell 8A, including schedule for completion	As-built or workplan due July 15, 2025; further deadlines TBD	Subject to request for a formal appeal hearing; draft workplan submitted on July 15, 2025; received LEA comments on draft workplan on November 20, 2025; under discussion with LEA; shared Chiquita's response to DTSC's and CalRecycle's comments on the draft workplan with LEA on November 22, 2025; formal appeal hearing regarding this workplan deferred per December 10, 2025 communication from LEA
Section 4.4	Install five additional TMPs (TPs 36-40) and submit final completion report with map	Final completion report due August 4, 2025	Subject to request for a formal appeal hearing; Chiquita requested extension to November 7, 2025 in a letter dated July 18, 2025; LEA rejected extension request on August 6, 2025; Chiquita responded to LEA and US EPA in a letter dated September 26, 2025; Chiquita completed installation of TMPs 36-40 as of December 11, 2025, and installation of TP-22, TP-23, and TP-33 as of February 11, 2026; final completion report with map submitted on February 18, 2026, and is under LEA review

ATTACHMENT E

Action Items Required by the United States Environmental Protection Agency

Unilateral Administrative Order (chart modified on February 27, 2026)

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; updated September 9, 2025	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; revised June 11, 2024 and July 2, 2024	Completed
22(c)(1)	Submit revised Leachate Management Plan (part of Master Work Plan).	May 4, 2024; revised August 2, 2024 and January 10, 2025	Completed
22(c)(6)	Submit revised Air Monitoring Plan (part of Master Work Plan).	May 7, 2024; updated May 17, 2024 and October 7, 2025	Completed
22(c)(2)	Submit revised Soil Reaction Break/Barrier Plan (part of Master Work Plan).	July 8, 2024; submitted additional data to LEA and EPA on January 2, 2025	Completed
22(c)(3)	Submit revised Cover Installation Plan (part of Master Work Plan).	July 9, 2024; revised January 14, 2025	Completed

Paragraph #	Key Action	Start Date/Deadline	Status
22(c)(5)	Submit revised Temperature Monitoring Plan (part of Master Work Plan).	July 17, 2024; response to Notice of Conditional Approval of the Temperature Monitoring Plan on March 18, 2025; Revised Temperature Monitoring Plan and response to Second Notice of Deficiency on September 25, 2025	Completed
30	Submit Data Management Plan.	July 17, 2024	Completed
80-86	Submit proposed financial assurance documents.	July 30, 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; updated March 27, 2025; approved May 1, 2025	Completed
73	Provide EPA with certificates of insurance and a copy of each insurance policy, naming EPA as an additional insured.	October 16, 2024 and October 15, 2025	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
24	Submit second revised Sampling and Analysis Plan and second revised ETLF QAPP.	January 23, 2025	Completed
90; U.S. EPA July 24, 2025 Letter	Work Plan for Additional Geomembrane Cover Work.	August 29, 2025; extension requested; revised October 3, 2025	Completed

Ongoing Work

Paragraph #	Key Action	Start Date/Deadline	Status
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.	Ongoing	As needed; ongoing
6	Condition all contracts and agreements with contractors,	Prompt individual discussions with contractors following	As needed; ongoing

	subcontractors, laboratories, or consultants in connection with the UAO, on compliance with terms of the UAO. Ensure their compliance with UAO.	issuance of UAO; written confirmations sent August 5, 2024; ongoing, as needed	
17	Submit a copy of each proposed contractor's QMP and demonstrate their compliance with ASQ/ANSI E4:2014.	Ongoing; under discussion with EPA	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 and updates as noted above.
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; January 23, 2025; ongoing	Response to EPA request for further information provided on June 10, 2025.

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
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
53	Use best efforts to obtain all necessary access agreements.	As needed	As needed; 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.	October 16, 2024; ongoing/prior to commencing Work; annually	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; ongoing
73, 75	Ensure that Chiquita and its contractors and subcontractors satisfy all applicable laws and regulations regarding the provision of employer's liability insurance and worker's compensation insurance for all persons performing Work.	February 26, 2024; ongoing	Ongoing
76-79	Submit revised cost estimates.	Annually and as needed	Ongoing
80-86	Revise financial assurance and financial assurance mechanisms.	As needed	As needed; ongoing
88	Notify EPA Project Coordinators of any delay or anticipated delay in performing any requirement of the UAO.	Within 48 hours after Chiquita first knew or should have known of a delay	As needed; ongoing

88	Provide written notification of delay in accordance with Paragraph 88.	Within 7 days after notifying EPA of delay	As needed; ongoing
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Future Work

Paragraph #	Key Action	Start Date/Deadline	Status
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	
22(c)(3)	Respond to EPA Notice of Deficiency regarding Response to EPA Notice of Deficiency and Update to Draft Removal Action Workplan: Extension of Covered Area	Meet and confer occurred on January 30, 2026. Updated plan and cost estimate due February 27, 2026	In progress

ATTACHMENT H

Action Items Required by the April 2, 2025 Department of Toxic Substances Control Imminent and Substantial Endangerment Determination and Order (chart modified on February 27, 2026)

Order ¶	Key Action	Start Date/Deadline	Status
5.1.3	Meet with DTSC to discuss response strategy.	April 9, 2025	Completed April 8, 2025
6.1	Submit the name, address, and telephone number of a Project Coordinator.	April 9, 2025; January 21, 2026	Completed April 9, 2025; change in Project Coordinator approved January 21, 2026
6.2	Submit the name, address, and resume of the project engineer or geologist chosen, and the statement of qualifications of the consulting firm responsible for the work.	April 9, 2025	Completed April 9, 2025
7	Provide written notice stating whether Respondents will comply with the Order's terms.	April 9, 2025	Completed April 9, 2025
6.25	Provide a copy of the Order to all contractors, subcontractors, laboratories, and consultants retained to conduct work performed under the Order within 15 days of the Order's Effective Date or the date of retaining services, whichever is later. Condition such contracts upon satisfactory compliance with this Order.	April 17, 2025	Completed April 17, 2025; ongoing as needed
6.3	Submit a Monthly Summary Report of activities conducted under the Order.	May 2, 2025 (on the 15th of every month thereafter)	Ongoing
5.1.2(a); 5.3; 5.4	Submit a draft removal action workplan (RAW) for extension of covered area; submit a revised draft RAW within 15 days of receiving comments or as otherwise directed by DTSC.	May 16, 2025 (extension granted 4/26/25); received comments 8/4/2025; revised draft due 10/3/2025 (extension granted 8/29/2025); received a notice with comments 12/26/2025 ¹ ;	Draft submitted May 16, 2025; revised draft submitted October 3, 2025; response to notice with comments submitted January 12, 2026; response to final notice submitted

¹ Chiquita received from DTSC on December 26, 2025 a Notice of Proposed Determination of Noncompliance with Imminent and Substantial Endangerment Determination and Order (ISE Order) regarding the three RAWs previously submitted to DTSC, directing a response by January 5, 2026. Chiquita requested from DTSC on December 30, 2025

		response due 1/12/2026 (extension granted 12/31/2025); received a notice 1/26/26 ²	February 11, 2026; under discussion with DTSC
5.1.2(b); 5.3; 5.4	Submit a draft RAW for interim relocation and stabilization of containerized waste; submit a revised draft RAW within 15 days of receiving comments or as otherwise directed by DTSC.	May 9, 2025 (extension granted 4/26/25); received comments 7/29/2025; revised draft due 9/19/2025 (extension granted 8/15/2025); received a notice with comments 12/26/2025; response due 1/12/2026 (extension granted 12/31/2025); received a notice 1/26/26	Draft submitted May 9, 2025; revised draft submitted September 19, 2025; response to notice with comments submitted January 12, 2026; response to final notice submitted February 11, 2026; under discussion with DTSC
5.1.2(c); 5.3; 5.4	Submit a draft RAW for protection of cell 8A from intrusion of SET event; submit a revised draft RAW within 15 days of receiving comments or as otherwise directed by DTSC.	July 1, 2025; received comments 10/15/25; revised draft due 10/30/25 (extension requested 10/24/25); received comments 10/15/2025; received a notice with comments 12/26/2025; response due 1/2/2026 (extension granted 12/31/2025); received a notice 1/26/26	Draft submitted July 1, 2025; responded to DTSC's comments with draft Master Schedule on November 21, 2025; response to notice with comments submitted January 12, 2026; response to final notice submitted February 11, 2026; under discussion with DTSC
5.4	Submit an implementation report documenting the implementation of the final RAW.	Within 30 days of completion of field activities	
5.6	Submit a one-year review workplan to describe inspection of the Site and evaluate the adequacy and integrity of the completed removal actions.	11 months from Implementation Report Date	
5.6	Conduct an inspection of the Site and evaluate the	1 year from Implementation Report date	

an extension of this deadline. Chiquita received the extension on December 31, 2025 and submitted its response on January 12, 2026.

² Chiquita received from DTSC a Final Determination of Noncompliance with, and Violation of, Imminent and Substantial Endangerment Determination and Order (ISE Order) regarding the three RAWs previously submitted to DTSC. Chiquita submitted its response on February 11, 2026.

	adequacy and integrity of the completed removal actions.		
5.6	Implement the one-year review workplan and submit a comprehensive report of the results of the review.	Within 60 days of One-Year Review Workplan Approval	
5.2	Work cooperatively with DTSC in providing public notice of response actions at the Site.	4/2/2025; as needed	As needed; ongoing
5.9	Take all appropriate action to prevent, abate, or minimize an emergency, release, or immediate threat of release of a hazardous substance and immediately notify DTSC Project Manager.	Immediately following an emergency	As needed; ongoing
5.9	Submit a report summarizing the emergency and the measures taken in response.	Within 7 days of the onset of emergency	As needed; ongoing
6.4	Perform all sampling and analysis according to DTSC-approved QA/QC procedures.	As needed	As needed; ongoing
6.10	Provide DTSC with access to the Site upon request and use best efforts to secure access to other sites as necessary to effectuate this Order.	April 2, 2025; as needed	As needed; ongoing
6.11	Submit the data described in ¶ 6.11 in the specified format upon request.	Within 7 days of data request; received first request dated July 14, 2025; received request dated October 15, 2025; received notice December 12, 2025 ³ ; response due December 22, 2025	Submitted proposed data submission schedule July 21, 2025; provided access to Chiquita's raw data via SCS eTools on October 30, 2025 and RMC on November 3, 2025; provided substantial additional data and information in response to DTSC's further data requests on December 22, 2025 and December 23, 2025; ongoing as requested

³ Chiquita received from DTSC on December 12, 2025 a Notice of Proposed Determination of Noncompliance with the ISE Order, directing Chiquita to provide data and information pursuant to section 6.11 of the ISE Order by December 22, 2025. Chiquita provided the requested data and information on December 22, 2025, with additional data and information provided on December 23, 2025.

6.11	Inform DTSC of all field sampling conducted under the Order and allow DTSC to take duplicates of any samples collected.	7 days prior to field sampling	As needed; ongoing
5.11	Upon request, demonstrate to DTSC and maintain financial assurance for identified and approved operation and maintenance and monitoring activities.	Upon request	Upon request
6.12	Preserve all data, reports, and other documents after the conclusion of all activities under the Order and notify DTSC prior to destroying any document prepared pursuant to the Order.	Preserve 5 years after conclusion of all activities under Order; notify DTSC 6 months prior to destroying	Ongoing

ATTACHMENT I

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

SOUTH COAST AQMD vs CHIQUITA CANYON, LLC
29201 Henry Mayo Drive
Castiac, CA 91348

Case No: 6177-4
Facility ID: 119219

Hearing Date: 12/09/2025

Hearing Type: Status Report/Modification Order for Abatement (Mod. O/A)

Previous Hearings: 09/06/2023, 01/16/2024, 01/17/2024, 03/21/2024, 04/24/2024, 08/17/2024,
08/27/2024, 11/13/2024, 04/16/2025, 06/04/2025, 06/17/2025 and 06/24/2025

Next Hearings: 01/29/2026 and 05/28/2026

HEARING BOARD ACTION

Action: Modified

Starting Date: 12/09/2025

Ending Date: 10/31/2026

RULES

203

402

431.1

1150

3002

Health and Safety §41700

EQUIPMENT DESCRIPTION

Landfill Operations

Present:

Micah Ali, Chair
Robert Pearman, Esq., Vice Chair
Jerry P. Abraham, MD MPH CMQ
Mohan Balagopalan
Cynthia Verdugo-Peralta

Representing the Petitioner:

Kathryn Roberts, Principal Deputy District Counsel
Mary Reichert, Senior Deputy District Counsel
Ryan Mansell, Principal Deputy District Counsel

Representing the Respondent:

Megan Morgan, Attorney at Law
Jake Duginski, Attorney at Law
Leigh Barton, Attorney at Law

Witness for the Petitioner:

Laurance Israel, Supervising Air Quality Inspector
Baitong Chen, Ph.D., Air Quality Engineer II

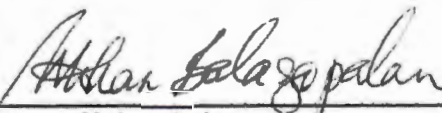
Witness for the Respondent: Patrick Sullivan, BCES, CPP, REPA
Neal Bolton, P.E.
Srividhya Viswanathan, P.E.
Robert Dick, P.E., B.C.E.E.

Petitioner's Exhibit: #98 – Stipulated Proposed Modifications – Redlined
#99 – Stipulated Proposed Modifications – Clean
#100 – Photos – Equipment Connected to Air Release Valve of Leachate Conveyance
#101 – SCE Engineers' Air Movement Study Report (Excerpts)

Respondent's Exhibit: FFFFF – Declaration of Patrick Sullivan, BCES, CPP, REPA
GGGGG – Declaration of Srividhya Viswanathan, P.E.
HHHHH – Declaration of Neal Bolton, P.E.
IIIII – Declaration of Robert Dick, P.E., B.C.E.E.
JJJJJ – Supplemental Declaration of Neal Bolton, P.E.
KKKKK – Supplemental Declaration of Robert Dick, P.E., B.C.E.E.
LLLLL – Testimony Presentation of Patrick Sullivan, BCES, CPP, REPA
MMMMM – Testimony Presentation of Srividhya Viswanathan, P.E.
NNNNN – Testimony Presentation of Neal Bolton, P.E.
OOOOO – Testimony Presentation of Robert Dick, P.E., B.C.E.E.

Motion: Balagopalan/Abraham 5-0

Board
Review/Approval


Mohan Balagopalan

Dated 2/12/26

Prepared by James Chavez
Attachment: Modified Stipulated Order for Abatement and Findings and Decision of the Hearing Board

1
2 **BEFORE THE HEARING BOARD OF THE**
3 **SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT**

4 **In The Matter Of**

Case No. 6177-4

5 SOUTH COAST AIR QUALITY
6 MANAGEMENT DISTRICT,

7 Petitioner,

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

8 vs.

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

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

11 Respondent.

Hearing Date: December 9, 2025

12 Time: 9:30 A.M.

13 Place: Hearing Board

South Coast Air Quality

Management District

21865 Copley Drive

Diamond Bar, CA 91765

14
15 On December 9, 2025, the Hearing Board convened a hearing to consider further
16 modifications to the Stipulated Order for Abatement, which was held pursuant to notice in
17 accordance with the provisions of California Health and Safety Code §§ 40823 and 42451(a) and
18 District Rule 812. The following members of the Hearing Board were present: Micah Ali, Chair;
19 Robert Pearman, Esq., Vice Chair; Jerry P. Abraham, MD, MPH, CMQ; Cynthia Verdugo-Peralta;
20 and Mohan Balagopalan. Petitioner South Coast Air Quality Management District (“South Coast
21 AQMD”) was represented by Kathryn Roberts, Principal Deputy District Counsel, Mary Reichert,
22 Senior Deputy District Counsel, and Ryan Mansell, Principal Deputy District Counsel. Respondent
23 Chiquita Canyon, LLC, was represented by Jacob P. Duginski, attorney at law, Megan L. Morgan,
24 attorney at law, and Leigh S. Barton, attorney at law, of Beveridge & Diamond, P.C. Further exhibits
25 were submitted by Petitioner and Respondent, and further testimony from both Petitioner’s and
26 Respondent’s witnesses was taken. The public was afforded a reasonable opportunity to provide
27 testimony in accordance with Health and Safety Code § 40828. The Hearing Board finds and decides
28 as follows:

STIPULATED FINDINGS

1
2 1. The Hearing Board convened a hearing on December 9, 2025. The hearing was held
3 pursuant to notice in accordance with the provisions of California Health and Safety Code §§
4 40823 and 42451(a) and South Coast AQMD Rule 812 to consider modifications to the Modified
5 Stipulated Order for Abatement.

6 2. The public was given the opportunity to testify and evidence was received.

7 3. Petitioner and Respondent stipulated to a further modification of conditions of the
8 Order.

9 4. Petitioner presented through multiple witnesses and exhibits. Supervising Air
10 Quality Inspector Laurance Israel testified to continuing odors in the affected communities,
11 provided updates on the number of complaints since the last hearing in June 2025, including that
12 there were several hundred complaints per month over the summer and that the South Coast
13 AQMD had seen an increase from there in the fall months of September through November.
14 Supervising Inspector Israel further testified that through November of 2025, Chiquita had been
15 issued 104 Notices of Violations for alleged violations of Rule 402 / Health and Safety Code
16 41700, including 13 in June; 5 in July, 11 in August, 16 in September, 12 in October, and 8 in
17 November. Supervising Inspector Israel also testified that the odors were impacting the same
18 general neighborhoods as had been discussed previously (particularly the Val Verde, Live Oak,
19 Hasley Hills, and Williams Ranch communities). Petitioner also presented evidence through South
20 Coast AQMD Air Quality Engineer Baitong Chen, Ph.D. regarding the South Coast AQMD's
21 reasons for seeking certain modifications of the existing Stipulated Order.

22 5. Respondent presented evidence of Respondent's operational status updates and
23 efforts under the current Stipulated Order for Abatement to address the ongoing reaction through
24 both declarations and live testimony of Patrick Sullivan, BCES, CPP, REPA; Neal Bolton, P.E.;
25 Srividhya Viswanathan, P.E.; and Robert Dick, P.E., B.C.E.E. Mr. Sullivan testified to certain
26 objective emissions and air monitoring metrics that he believes should be considered in addition to
27 the subjective odor complaint and notice of violation data, including landfill gas recovery data, flux
28 chamber study data, and community air monitoring data. Mr. Sullivan testified that each of these

1 objective data points showed a level of improvement and were reflective of the various corrective
2 actions that have occurred onsite. On the odor complaint and notice of violation data, Mr. Sullivan
3 testified to what he considers the significant improvements seen between 2024 and 2025. Mr.
4 Sullivan also testified to analyses he and his team conducted on two sets of South Coast AQMD's
5 odor complaint data, one containing specific complainant address information and one containing
6 only complainant street location information. Based on these analyses, Mr. Sullivan concluded that
7 any impact areas are localized and that a limited number of addresses are contributing the largest
8 number of complaints. Mr. Sullivan further testified as to the various additional analyses he would
9 be able to conduct on odor complaint data if Respondent were to continue to receive odor
10 complaint data with specific complainant address information. Mr. Bolton testified to the
11 installation of more than 16 acres of the new 60-mil EVOH cover as well as a voluntary settlement
12 evaluation report that Mr. Bolton and his team prepared. This report concluded that the diminishing
13 rate of settlement indicates that the reaction is slowing rather than expanding. Mr. Bolton and his
14 team believe this decrease in annualized settlement implies the mitigation measures implemented
15 by Chiquita are effective in mitigating the reaction. Ms. Viswanathan testified to the continued
16 expansion of the landfill gas collection and control systems and the dewatering system. She also
17 testified to the impacts of the installation of the EVOH cover on these systems and how this
18 installation project may impact the extraction of liquids and landfill gas. Mr. Dick provided updates
19 on the remote monitoring system and some of the adjustments he and the Reaction Committee have
20 made to the data-driven reaction area boundary since June 2025 to incorporate select individual
21 wells into the data-driven boundary. He also testified that he believes the data is showing potential
22 contractions in some areas.

23 6. At the conclusion of the testimony, Petitioner and Respondent stipulated that there
24 was good cause to adopt the Modified Stipulated Order for Abatement with conditions as presented
25 in Petitioner's Exhibit 99, including that:

- 26 a. The imposition of the Modified Stipulated Order for Abatement would result in
27 the mitigation of conditions potentially impacting the public.

28

1 CONCLUSIONS

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

4 2. The Modified Stipulated Order for Abatement is not intended to be nor does it act as
5 a variance.

6 3. The Hearing Board need not make the findings required by South Coast AQMD Rule
7 806(a) because the Modified Stipulated Order for Abatement is made pursuant to the stipulation of
8 Petitioner and Respondent.

9
10 ORDER

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

16 **Odor Surveillance**

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

- 19 a. Respondent shall contract with a trained third party to conduct odor surveillance
20 each operating day within thirty (30) days after the issuance of the September 6,
21 2023 Order (the "Initial Order"). Respondent shall conduct odor surveillance each
22 operating day until the trained third party has been contracted. Respondent, or
23 Respondent's contractor, as applicable, shall conduct community odor surveillance
24 at least twice each operating day, once between the hours of 6:00 a.m. and 11:00
25 a.m. and once between the hours of 7:00 p.m. and 12:00 a.m. If a three-week period
26 passes without Respondent receiving a Rule 402 NOV from the South Coast
27 AQMD, or detecting odors at above an intensity of 2 at more than 2 stops during a
28 single surveillance, then Respondent, or Respondent's contractor, as applicable,

1 may stop conducting the odor surveillances. If Respondent, or Respondent's
 2 contractor, as applicable, has stopped conducting the odor surveillances pursuant to
 3 this condition and Respondent subsequently receives a Rule 402 NOV from the
 4 South Coast AQMD, then Respondent, or Respondent's contractor, as applicable,
 5 must resume conducting the odor surveillances until another three-week period
 6 passes with no Rule 402 NOVs issued by the South Coast AQMD, or without
 7 Respondent or Respondent's contractor, as applicable, detecting odors at above an
 8 intensity of 2 at more than 2 stops in a single surveillance.

- 9 b. Respondent, or Respondent's contractor, as applicable, shall conduct an odor
 10 surveillance at each of the following Surveillance Locations:

Stop	Description
1.	Intersection of Chiquito Canyon Road and driveway leading to the LA County Fire's Del Valle Regional Training Center
2.	Intersection of Chiquito Canyon Road and Lincoln Avenue
3.	Intersection of Lincoln Avenue and Jackson Street
4.	Intersection of Lincoln Avenue and Harding Avenue
5.	Intersection of Buchanan Way and Chiquito Canyon Road
6.	Intersection of Chiquito Canyon Road and San Martinez Road
7.	Intersection of San Martinez Road and Morningside Drive
8.	Intersection of Lexington Drive and Morningside Drive
9.	Intersection of Val Verde Road and Trellis Road
10.	Intersection of San Martinez Road and Euclid Ave.
11.	Intersection of San Martinez Road and Keningston Road
12.	Intersection of Hunstock Street and Windsor Road
13.	Intersection of Del Valle Road and Silver Street
14.	Intersection of Del Valle Road and Hasley Canyon Road
15.	Intersection of Hasley Canyon Road and Gibraltar Lane
16.	Intersection of Gibraltar Lane and Alton Way
17.	Intersection of Gibraltar Lane and Springvale Lane
18.	Intersection of Castlebury Place and Picadilly Place
19.	Intersection of Gibraltar Lane and Cambridge Avenue
20.	Intersection of Cambridge Avenue and Hasley Canyon Road
21.	Intersection of Creekbed Road and Firebrand Drive
22.	Intersection of The Old Road and Hillcrest Parkway

Stop	Description
23.	Intersection of Hillcrest Parkway and Park Vista Drive at Castaic Elementary School
24.	Intersection of Hasley Canyon Road and Commerce Center Drive (Santa Clarita Valley International School & PlayMakers Preschool)
25.	Intersection of The Old Road and Live Oak Road
26.	Intersection of Live Oak Road and Hidden Trail Road
27.	Intersection of Rangewood Road and Buckskin Drive
28.	Intersection of Live Oak Elementary School at Saddleridge Way
29.	Intersection of Quincy Street and Cambridge Avenue
30.	Intersection of Commerce Center Drive and Witherspoon Parkway
31.	Intersection of Franklin Parkway and driveway leading to the United States Postal Service
32.	Intersection of Henry Mayo Drive and Cambridge View Drive, leading into the Valencia Travel Village RV Resort
33.	Intersection of Valencia Boulevard at West Ranch High School
34.	Intersection of Hasley Canyon Road and Valley Glen Street
35.	Intersection of Hasley Canyon Road and Sloan Canyon Road
36.	Intersection of Sloan Canyon Road and Hillcrest Parkway
37.	Intersection of Hillcrest Parkway and The Old Road
38.	Intersection of Hillcrest Parkway at Castaic Middle School

- c. Respondent, or Respondent's contractor, as applicable, conducting the odor surveillance shall not have visited the Reaction Area (as defined in Condition 9(a)), working face, or other areas where exposed trash or landfill gas odors exist at CCL within four hours prior to conducting an odor surveillance.
- d. Odor surveillance shall be conducted by proceeding to each Surveillance Location and making an assessment of each parameter listed in Condition No. 1(e). Assessment of each parameter shall be made while standing in ambient air and shall not be made from within a vehicle.
- e. Respondent, or Respondent's contractor, as applicable, shall record odor surveillance results in an "Odor Surveillance Log" before the end of the work day. The Odor Surveillance Log shall contain, but not be limited to: (1) the date and time; (2) stop number; (3) the name of the person performing the surveillance and written acknowledgement that they did not visit the working face or other on-site areas

1 where exposed trash or landfill odors such as, but not limited to landfill gas odors,
2 refuse or refuse contaminated material odors, or landfill liquids/landfill leachate
3 odors exist within a four hours prior to conducting an odor surveillance, (4) the wind
4 speed and direction; (5) a narrative description of any odor detected (including the
5 type of odor, such as trash, landfill gas, chemical, odor neutralizer, as applicable);
6 (6) current weather conditions; and (7) an assessment of the strength of any odor
7 detected using the scale below:

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

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- 12 f. If Respondent, or Respondent's contractor, as applicable, conducting the odor
- 13 surveillance detects odors at three or more stops that are determined to be of a
- 14 strength of 3 or higher on the scale above during any surveillance occurring during
- 15 Respondent's operating hours (between the hours of 4:00am and 5:00pm), that are
- 16 described as chemical, leachate, landfill gas, or similar non-trash landfill odors,
- 17 Respondent, or Respondent's contractor, as applicable, shall immediately notify
- 18 landfill operating staff responsible for the Reaction Area. If such odors are
- 19 described as trash, Respondent, or Respondent's contractor, shall immediately
- 20 notify landfill operating staff responsible for the Working Face Area. Respondent
- 21 shall designate an employee in each of the Reaction Area and the Working Face
- 22 Area able to receive and direct action related to such notifications promptly. Upon
- 23 receiving such notification for the Reaction Area, Respondent shall, within 30
- 24 minutes of receipt, review and initiate modifications, as appropriate, to fan
- 25 placement, and conduct a visual inspection of the Reaction Area (as defined in
- 26 Condition 9(a)) to assess, and address as needed, any cracks in the surface of the
- 27 area. Upon receiving such notification for the Working Face Area, Respondent shall
- 28 employ all appropriate trash odor mitigation strategies, including taking action

1 pursuant to Condition No. 43. Respondent shall have trained employee(s) or trained
2 contractor(s) re-perform odor surveillance following deployment of additional
3 mitigation to assess if trash odors have dissipated, and, as applicable, take additional
4 remedial steps pursuant to Condition No. 43(f).

- 5 2. Respondent shall maintain records of all Odor Surveillance Logs for the duration of this
6 Order and shall make them available for inspection by South Coast AQMD in an easy-to-
7 review chart-style format within 5 working days of request. Respondent shall maintain a
8 written record of any notification received, and any action taken in response to notice under
9 Condition 1(f).

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

- 11 3. Respondent shall expedite, to the maximum extent feasible, replacement of granular
12 activated carbon media in the Landfill Gas Treatment System (under Permit G55163, A/N
13 603249), including the execution of contracts, as well as the delivery, replacement, startup,
14 and testing of any operation necessary to replenish and/or replace spent granular activated
15 carbon media in the Landfill Gas Treatment System. Respondent shall ensure adequate
16 stock of all odor control products and supplies are maintained on site.

- 17 a. Respondent shall monitor and record the landfill gas temperature at least daily at
18 the inlet of the Landfill Gas Treatment System. The temperature of the landfill gas
19 shall not exceed 145 F.

- 20 4. Respondent shall maximize landfill gas combustion utilizing all operational flares
21 (excepting periods of maintenance, breakdowns, or automatic shutdown) to limit release of
22 raw landfill gas. Respondent shall prioritize and maximize the use and operation of landfill
23 gas flares No. 2 (under Permit G73696, A/N 645450) and No. 3 (under A/N 624296) over
24 landfill gas flare No. 1 (under Permit G73696, A/N 645450) to the maximum extent feasible
25 when combusting landfill gas at the facility (FID 119219). Once Respondent receives the
26 necessary permits and puts the new landfill gas flare discussed in Condition 21 ("landfill
27 gas flare No. 4") into operation, Respondent shall prioritize and maximize the use and
28 operation of landfill gas flares Nos. 3 and 4 over landfill gas flares No. 1 and No. 2 (under

1 Permit G73696, A/N 645450) and prioritize and maximize the use and operation of landfill
2 gas flare No. 2 over landfill gas flare No. 1 to the maximum extent feasible when
3 combusting landfill gas at the facility (FID 119219).

4 5. Respondent shall sample, analyze, and record the landfill gas sulfur compounds combusted
5 in each flare (as measured at sampling location FL-150 that is representative of the gas
6 combusted in the flares under Permit G73696, A/N 45450; A/N 624296), in the thermal
7 oxidizer/flare, and in any other landfill gas control equipment operating on site at least once
8 each week using colorimetric tests for H₂S and at least once each day sample for analysis
9 for total sulfur compounds as H₂S using South Coast AQMD Method 307-91. Additionally,
10 Respondent shall sample, analyze, and record the landfill gas sulfur compounds and
11 speciated organic compounds found in the raw, pre-treatment and pre-control, landfill gas
12 collected from the Reaction Area (as defined in Condition 9(a)) at least once each calendar
13 month for total sulfur compounds as H₂S using South Coast AQMD Method 307-91 and
14 for speciated organic compounds using U.S. Environmental Protection Agency (EPA)
15 Method TO-15.

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

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

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

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

1 iii. Colorimetric tube readings shall use colorimetric tubes of appropriate
2 concentration range and shall be reported as follows:

3 1. Respondent shall first use the estimated appropriately ranged colorimetric
4 tube.

5 2. If the resulting reading reaches the upper concentration of the colorimetric
6 tube concentration range, subsequent reading(s) shall be taken using a
7 colorimetric tube with a concentration range that has a larger upper
8 concentration threshold until the result is not the upper concentration
9 threshold of the concentration range. Report the tube concentration range
10 and tube concentration result for each reading.

11 3. If the reading results in the lower concentration of the colorimetric tube
12 concentration range or does not register a result, subsequent reading(s)
13 shall be taken using a colorimetric tube with a concentration range that has
14 a smaller lower concentration threshold, if available, until the colorimetric
15 tubes available to the facility result in:

16 a. A reading that is within the concentration range of the tube,

17 b. A reading is the lower concentration of the colorimetric tube
18 concentration range, or

19 c. The colorimetric tube does not register a result.

20 4. When the result is the lower concentration of the colorimetric tube
21 concentration range or does not register a result, the lower concentration
22 of the colorimetric tube concentration shall be considered the
23 concentration result. Report the tube concentration range and tube
24 concentration result for each reading. If a lower range colorimetric tube is
25 not used and the tube concentration result is below the lower range of the
26 colorimetric tube used, Respondent shall report the result as “less than” or
27 “<” the lower range value of the tube. Notwithstanding the forgoing,
28 Respondent shall ensure that the colorimetric tube result is below the upper

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

- 6. Respondent shall maintain adequate stock of appropriately ranged colorimetric tubes.
- 7. Respondent shall maintain a record of the following information, and provide such records to the South Coast AQMD pursuant to Condition No. 8:
 - a. The hourly and daily flow of landfill gas combusted, in standard cubic feet, in each flare (flares No. 1 & No. 2 under Permit G73696, A/N 645450; flare No. 3 under A/N 624296), the thermal oxidizer/flare (under Zeeco A/N 653611), and any other equipment used to combust or control landfill gas at the facility, and the total amount of landfill gas combusted at the facility;
 - b. The daily flow of landfill gas not flared, in standard cubic feet, if applicable; and
 - c. The results of the sulfur readings, sampling, and analyses, calculated as H₂S with the time and date when each measurement or sample collection was conducted.
- 8. Respondent shall submit a monthly written report on the landfill operation, progress of the status of the Landfill Gas Flares (flares No. 1 and No. 2 under Permit G73696, A/N 645450; flare No. 3 under A/N 624296), Landfill Gas Treatment System (under Permit G55163, A/N 603249), and efforts to resolve the total sulfur concentration in the landfill gas exceeding 150 ppmv calculated as H₂S. As of March 21, 2024, monthly reports shall be submitted to South Coast AQMD on the 20th of each subsequent month, or the following business day, not later than 5:00pm via email to Baitong Chen, Air Quality Engineer, (bchen@aqmd.gov); Nathaniel Dickel, Senior Air Quality Engineer, (ndickel@aqmd.gov), and Christina Ojeda, Air Quality Inspector, (cojeda@aqmd.gov). Each monthly report shall contain at a minimum the following information:
 - a. The landfill gas sulfur compounds measurements and laboratory analysis with the time and date of each measurement or sample collection, as identified in Condition No. 5.
 - b. The landfill gas records and calculations identified in Condition No. 7, in a Microsoft Excel spreadsheet format. If the landfill gas records show any landfill gas

1 combustion/control equipment (flares or thermal oxidizers) are offline for a period
2 exceeding 7 consecutive calendar days, or offline for more than 15 calendar days in
3 any one calendar month, Respondent shall report a detailed description of the
4 reason(s) the equipment was offline (equipment breakdown, maintenance,
5 construction, whether there was sufficient landfill gas control redundancy to control
6 the collected landfill gas, etc.).

7 c. The integrated landfill surface sample analysis and landfill surface monitoring
8 readings identified in Condition Nos. 9 and 10, in a Microsoft Excel spreadsheet
9 format. The aerial surveillance maps, follow-up field inspection measurements with
10 associated dates/times, cause of exceedances, any corrective actions performed, and
11 documentation (date, time, reasoning) of field inspections not performed due to
12 inaccessibility or dangerous conditions identified in Condition 77.

13 d. Estimated schedule for any replacement or refurbishment of granular activated
14 carbon media in the Landfill Gas Treatment System (under Permit G55163, A/N
15 603249) identified in Condition No. 3. The landfill gas temperature at inlet of the
16 Landfill Gas Treatment System (under Permit G55163, A/N 603249) identified in
17 Condition No. 3(a).

18 e. Description of any problems or delays, if any, encountered or projected to occur
19 pertinent to the execution of contracts, as well as the delivery, replacement, startup,
20 and testing of any operation necessary to replenish and/or replace spent granular
21 activated carbon media in the Landfill Gas Treatment System (under Permit
22 G55163, A/N 603249). Respondent shall submit copies of documents or other
23 records to support any problems or delays noted pursuant to this Condition No. 8(e)
24 along with such description.

25 f. Specifications of the equipment and materials used for the weekly colorimetric tests
26 (only if there is a change from the previously provided specifications of the
27 colorimetric instrumentation or method used).

- 1 g. All wellhead temperature, temperature probe, CO concentration measurements for
2 those wells requiring analytical data, H2 concentration measurements for those
3 wells requiring analytical data, CH4 measurements, O2 measurements, CO2
4 measurements, CH4:CO2 ratios, lab analysis, and Draeger tube readings for landfill
5 gas from the past month in a Microsoft Excel spreadsheet format.
- 6 h. A graphic map showing location of each well with temperature exceedances (above
7 145 degrees Fahrenheit), each well with CO exceedances (above 1,000 ppmv and
8 less than or equal to 1,500 ppmv, above 1,500 ppmv and less than or equal to 2,000
9 ppmv, and above 2,000 ppmv), and stratification of temperature ranges during that
10 month, which includes a description of any remedial measures taken to address or
11 lower gas well temperatures or gas concentrations.
- 12 i. All vertical liquid impacted landfill gas wells, per Condition No. 17, including a
13 description of any remedial measures taken to address or reduce liquids in landfill
14 gas wells.
- 15 j. Updates on the investigation into the availability, viability, and utilization, including
16 pilot testing if needed, of an alternative sulfur compound treatment system that
17 controls, treats, or removes dimethyl sulfide (“DMS”) and other sulfur compounds,
18 if any.
- 19 k. A summary report on Respondent’s implemented improvements to the landfill gas
20 collection system beyond the additions to the landfill gas collection system required
21 pursuant to Condition No. 15 and 8(m).
- 22 l. An inspection and repair log for the landfill cover and geosynthetic cover
23 inspections, pursuant to Condition No. 30 and any connection points, seams, and
24 seals of the geosynthetic cover, pursuant to Condition No. 97.
- 25 m. Any subsequent additions to the landfill gas collection system, pursuant to
26 Condition No. 15; an updated vertical extraction well map detailing all existing fully
27 functional working vertical extraction wells and the vertical extraction well
28 additions completed within the month; a map showing an overlay of fully

1 operational working wells and landfill surface monitoring grids, and outlines of the
2 areas demarcated as exempt in the attached Exhibit A pursuant to Condition 15(b);
3 copies of as-built well logs (regarding well depth installations and updates) for
4 vertical extraction wells completed within the month; and an updated map or
5 drawing of as-built landfill gas collection and conveyance infrastructure, current
6 with respect to any substantial modifications to the main headers of the landfill gas
7 collection and control system, with the boundaries of the Reaction Area included.

8 n. Any subsequent additions to the landfill gas condensate or leachate collection
9 system, such as dewatering sumps/pumps, or other dewatering work performed per
10 the dewatering guidelines and implementation plan pursuant to Condition No. 18.

11 o. Updates on the procurement and installation of the geosynthetic cover(s), pursuant
12 to Condition No. 31, and including changes required or approved by the Local
13 Enforcement Agency.

14 p. Updates on landfill excavation work subject to Rule 1150, including excavation
15 location(s) (that are identified on graphic map(s) of the landfill), and
16 excavated/exposed waste characteristics (saturated, semi-dry, dry, odor type and
17 intensity, etc.) Excavation work occurring pursuant to an exemption as listed in
18 South Coast AQMD Rule 1150(c)(3), or Rule 1150(c)(2) that is performed in the
19 Reaction Area, must also be included in these updates.

20 q. Updates regarding leachate including:

21 i. Leachate temperature recordings pursuant to Condition No. 27(a);

22 ii. Daily log of inspection findings and containment activities
23 pursuant to Condition 27(b);

24 iii. Weekly record of leachate seepage and pooling pursuant to
25 Condition 27(c);

26 iv. Quantity of leachate measured, and associated company name and
27 physical address of the off-site disposal/treatment facility(ies) that
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receive leachate generated by the landfill, pursuant to Condition 27(d);

v. A list of all hazardous and non-hazardous liquid storage and treatment facilities that have been contacted and current status of each facility including available, contracted, and utilized capacity to receive hazardous and non-hazardous landfill liquids; and

vi. An update regarding the number of tanks in each leachate tank group; the total number of leachate tanks treated; the monthly and year-to-date total quantity of liquid collected; the monthly and year-to-date total quantity of liquid treated; and the monthly and year-to-date total quantity of seeping, pooling, or ponding leachate collected.

r. Daily landfill gas composition analysis, including CH4%, CO concentration (ppm), CO2%, and O2%, as recorded by a real time analyzer and/or sample collected, at the inlets of the control equipment (TOx, Flares, and any additional control equipment brought on site to combust landfill gas). The analysis shall be conducted by a South Coast AQMD approved analyzer for CH4, CO2, or O2 and analyzed pursuant to U.S. EPA Method 10 or Method ALT-144 for CO. Request for approval shall include submittal of analyzer specifications.

s. Updates regarding the procurement of the equipment needed to construct Flare No. 4 pursuant to Condition No. 74.

9. Respondent shall collect integrated landfill surface samples for analysis across the Reaction Area (as defined in Condition 9(a)) at least three times per month, at intervals no more than once every 7 days (unless conducting additional monitoring events exceeding three per month), and additionally across the remainder of the landfill at least four times per quarter as specified in Rule 1150.1 Attachment A 2.0. In the event Respondent is unable to sample specific landfill surface area(s) or grid(s) due to inaccessibility or dangerous conditions for a technician, Respondent shall document the date and the conditions that do not allow the

1 sampling of the specific area(s) or grid(s). Documentation shall be sufficient to show the
2 inaccessibility or dangerous conditions and may include weather forecasts and actual
3 rainfall measurements, or photographs and/or videos that depict the site conditions that
4 prevent such sampling activities for each specific area or grid affected.

5 a. The “Reaction Area” shall be defined initially by the boundary of Cells
6 1/2A, 2B/3, 4, and Module 2B/3/4 P2. The boundary of the Reaction Area
7 shall be modified to include the associated landfill surface area of the cells
8 and modules that experience well temperatures of at least 170 degrees
9 Fahrenheit, settlement, cracks in the landfill cover, presence and quantity
10 of liquids, the presence of hydrogen in the landfill gas, and readings of
11 temperature probes (once data is available). The Reaction Committee
12 (defined in Condition No. 12), shall transmit to the South Coast AQMD
13 [attn: Baitong Chen, bchen@aqmd.gov; Nathaniel Dickel,
14 ndickel@aqmd.gov; Christina Ojeda, cojeda@aqmd.gov]: 1) the revised
15 map which clearly displays the proposed boundary change(s) and depicts
16 the new Reaction Area; 2) a narrative summary explaining the rationale
17 behind the proposed changes, including memorializing any dissenting
18 view of any member of the Reaction Committee; 3) any supporting data
19 relied upon in the decision to revise the Reaction Area; and 4) locations of
20 each temperature probe, clearly distinguished from the landfill gas wells
21 on the map.

22 b. The Reaction Committee shall review applicable data to determine the
23 extent and boundary of the ongoing Reaction. The Reaction Committee
24 shall consider revision to this data determined Reaction boundary, and the
25 Reaction Area as defined in Condition 9(a), as frequently as appropriate
26 but shall make a determination about whether to revise the data determined
27 Reaction boundary, and the Condition 9(a) Reaction Area map at least
28 once per month. The determination shall be made according to landfill gas

1 wellhead temperatures, temperature probe measurements, landfill gas
2 quality and methane to CO₂ ratio, landfill gas concentration of carbon
3 monoxide and hydrogen, landfill settlement, leachate quantities,
4 pressurized leachate releases, odor characteristics, and waste conditions
5 according to borehole drilling logs. Supporting evidence, assumptions,
6 and explanation for the determination, revised Reaction boundary,
7 Reaction Area map (if applicable), isothermal gradient range map
8 consisting of wellhead temperature measurements, wellhead carbon
9 monoxide range map, wellhead hydrogen range map, wellhead CH₄:CO₂
10 ratio range map, quarterly landfill settlement isopach map, and vertical
11 temperature profiles for temperature probes shall be submitted to the South
12 Coast AQMD [attn: Baitong Chen, bchen@aqmd.gov; Nathaniel Dickel,
13 ndickel@aqmd.gov; Christina Ojeda, cojeda@aqmd.gov] no later than 10
14 days following the end of the month. Each map specified above shall
15 include an outline of the data determined reaction boundary. The carbon
16 monoxide map shall include differentiated concentration ranges of < 500
17 ppmv, ≥ 500 and < 1,000 ppmv, ≥ 1,000 and < 1,500 ppmv, ≥ 1,500 and
18 < 2,000 ppmv, and ≥ 2,000 ppmv. The hydrogen map shall include
19 differentiated hydrogen concentration ranges of < 2%, ≥ 2 and < 5%, ≥ 5
20 and < 10%, and ≥ 10%. The CH₄:CO₂ map shall include differentiated
21 ratios of < 0.5, ≥ 0.5 and < 0.9, ≥ 0.9 and < 1.1, ≥ 1.1 and < 1.5, and ≥ 1.5.
22 The landfill settlement isopach map shall include a color scale to
23 demonstrate severity of settlement and shall be updated at least once
24 quarterly.

- 25 10. Respondent shall conduct instantaneous landfill surface monitoring across the Reaction
26 Area (as defined in Condition 9(a)) at least three times per month, at intervals no more than
27 once every 7 days (unless conducting additional monitoring events exceeding three per
28 month), and additionally across the remainder of the landfill at least four times per quarter

1 as specified in Rule 1150.1, Attachment A 3.0, beginning no later than seven (7) days after
2 the issuance of this Order. In the event Respondent is unable to monitor specific landfill
3 surface area(s) or grid(s) due to inaccessibility or dangerous conditions for a technician,
4 Respondent shall document the date and the conditions that do not allow the monitoring of
5 the specific area(s) or grid(s).

- 6 11. Respondent shall continue operating its flares and landfill gas treatment system even if the
7 emitted landfill gas exceeds the limits on total reduced sulfur and SO_x laid out in CCL's
8 permits (Permit G55163, Condition Nos. 11 and 16 and CCL's Facility-Wide Permit,
9 Condition No. 3) and South Coast AQMD Rules 431.1(c)(2), 3002(c)(1), and 203(b).
10 Respondent shall include deviation reporting associated with exceedances of these
11 emissions limits in its semi-annual Title V reports and in accordance with the requirements
12 of Respondent's Title V permit.

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

- 14 12. Respondent shall organize a committee (the "Reaction Committee") consisting of subject
15 matter experts to aid in the investigation, impact assessment, and remediation of the
16 ongoing landfill reaction and resultant odors as specified below. Respondent shall, through
17 retention of one or more consultants and/or designation of one or more new or existing
18 employees, complete the formation of the Reaction Committee within thirty (30) days of
19 the issuance of this Order. Respondent shall, within thirty (30) days of the issuance of this
20 Order, or within ten (10) days of their appointment, if appointment occurs after October 6,
21 2023, provide to the South Coast AQMD [Baitong Chen, Air Quality Engineer,
22 (bchen@aqmd.gov); Nathaniel Dickel, Senior Air Quality Engineer, (ndickel@aqmd.gov),
23 and Christina Ojeda, Air Quality Inspector (cojeda@aqmd.gov)] the names of all persons
24 included in the Reaction Committee along with a Curriculum Vitae, or other description of
25 the individual's credentials, experience, and/or expertise in the applicable subject matter.

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

- 28 i. Landfill design and operational best management practices;

- 1 ii. Landfill gas collection/extraction systems, landfill gas
- 2 condensate/leachate collection systems, and landfill gas control;
- 3 iii. Chemical reaction(s) within landfills leading to formation of and
- 4 elevated levels of dimethyl sulfide (“DMS”) and non-methane
- 5 organic compounds (“NMOC”);
- 6 iv. Public health relating to air quality and exposure to air
- 7 contaminants including DMS. The public health member shall, at
- 8 a minimum, apply CAAQS and applicable OEHHA standards,
- 9 reference exposure levels, and cancer potency factors in
- 10 performing analyses of potential health impacts or effects and in
- 11 reaching conclusions. The public health member shall also include
- 12 in any human health screening evaluation an odor assessment
- 13 evaluating the potential health impact of exposure to odorants in
- 14 addition to cancer and non-cancer risk determination.

15 b. Reaction Committee members shall be subject to ongoing oversight by the South
16 Coast AQMD. If in the South Coast AQMD’s determination one or more members
17 appointed by Respondent to the Reaction Committee is not serving in this capacity
18 satisfactorily, as defined herein, South Coast AQMD may provide written notice to
19 Respondent through Counsel that the applicable person(s) is no longer serving
20 satisfactorily. Failure to serve in a satisfactory capacity is defined as:

- 21 i. Failure of a Reaction Committee member to attend regularly
- 22 scheduled meetings of the Reaction Committee and South Coast
- 23 AQMD technical staff without prior notice;
- 24 ii. Failure of a Reaction Committee member to meet deadlines
- 25 imposed on the Reaction Committee for deliverables set forth in
- 26 this Order;
- 27 iii. Failure of the Public Health member to include the analyses
- 28 required by Condition 12(a)(iv); or

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- iv. Failure of a Reaction Committee member to respond in a timely and substantive manner to recommendations provided by South Coast AQMD technical staff, as required by Condition 12(f)(iv)
- c. If Respondent receives such notice from South Coast AQMD, Respondent may respond in writing within ten (10) days to contest South Coast AQMD's conclusion and explain how the member will remedy the cited unsatisfactory conduct and why such conduct does not affect the member's ability to serve in a satisfactory capacity on the Reaction Committee in the future.
- d. If South Coast AQMD receives such a response, South Coast AQMD shall have ten (10) days to determine whether a member of the Reaction Committee may continue to serve on the Reaction Committee. If South Coast AQMD determines that Respondent's written response does not address the alleged unsatisfactory performance, then South Coast AQMD may petition for a status/modification hearing before the Hearing Board, and the Hearing Board shall determine if a member of the Reaction Committee should be removed.
- e. While awaiting a decision from the Hearing Board, a member of the Reaction Committee may continue to serve on the Reaction Committee. If the Hearing Board determines that a member of the Reaction Committee's performance has not been satisfactory, then it may issue an Order directing Respondent to remove and replace that member of the Reaction Committee. Respondent shall remove the applicable person from any further work or service on the Reaction Committee within ten (10) days of receipt of the Order. Respondent shall identify and appoint a replacement member of the Reaction Committee, pursuant to Condition No. 12(a) above, within thirty (30) days of receipt of the Order.
- f. Beginning in March 2024, Respondent shall host a monthly virtual meeting with all members of the Reaction Committee and South Coast AQMD technical staff. The purpose of the monthly meeting shall be to allow Reaction Committee members to provide an update on progress of ongoing and future planned work performed/to be performed pursuant to this Order which is directly related to the subsurface reaction at the Landfill, and allow South Coast AQMD to provide recommendations and/or feedback on such progress.

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- i. To facilitate each meeting, Respondent shall provide South Coast AQMD (attn: Baitong Chen, bchen@aqmd.gov; Nathaniel Dickel, ndickel@aqmd.gov; Christina Ojeda, cojeda@aqmd.gov; Payam Pakbin, ppakbin@aqmd.gov; Kathryn Roberts, kroberts@aqmd.gov; Mary Reichert, mreichert@aqmd.gov) a proposed agenda listing the topics to be discussed, and the presenter, not later than ten (10) calendar days prior to the meeting. South Coast AQMD shall have the option to expand the agenda to include additional topics within the purview of the Reaction Committee. If South Coast AQMD elects to expand the agenda, it shall provide notice to Respondent not later than four (4) calendar days prior to the meeting. Any tables, graphs, or documents that will be presented during the meeting shall be provided to South Coast AQMD no later than two (2) calendar days prior to the meeting.
- ii. Respondent shall ensure that all members of the Reaction Committee with responsibility for any topic included on the agenda shall attend that month's meeting. At Respondent's election, additional staff or consultants may also attend. At South Coast AQMD's sole discretion, it may invite any staff or consultant of any regulatory agency with jurisdiction over Respondent, including jurisdiction predicated on the subsurface reaction at the Landfill, to participate in and provide recommendations or feedback on any agenda topics.
- iii. South Coast AQMD, and any personnel invited pursuant to the clause above, may provide feedback or recommendations on any topic on the agenda. Comments noted as "recommendations" shall include suggestions to revise, change, expand, or otherwise alter

1 any aspect of the topic discussed on the agenda. All other
2 comments shall be considered feedback.

3 iv. Following each monthly meeting, Respondent shall prepare a
4 summary of the meeting, including the topics discussed and all
5 recommendations received. Respondent shall include in the
6 summary a response from the Reaction Committee to all
7 recommendations and, as applicable, any changes made as a result.
8 Respondent, at its election, may also include a summary of and
9 response to any feedback received. Respondent shall post the
10 summary of the meeting to the webpage created pursuant to
11 Condition No. 39, not later than twenty (20) days following the
12 meeting.

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

17 i. A study into known and possible methods for effective treatment
18 of DMS and preventative mechanisms for DMS formation in
19 landfill gas, including assessment of other landfills and review of
20 scientific studies. By no later than April 30, 2024, Respondent shall
21 provide a report detailing the findings of this Landfill Gas DMS
22 Treatment Study and the proposals for implementation of the
23 treatment methods. This report shall be submitted to South Coast
24 AQMD [Baitong Chen, Air Quality Engineer, (bchen@aqmd.gov);
25 Nathaniel Dickel, Senior Air Quality Engineer,
26 (ndickel@aqmd.gov), and Christina Ojeda, Air Quality Inspector,
27 (cojeda@aqmd.gov)]. Respondent shall submit any required
28 permit applications, with information included, for equipment

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- installations or modifications necessary for implementation of the remedy strategies and/or treatment methods;
- ii. An investigation and report on 1) the cause of the alleged chemical reaction(s) resulting in the elevated well temperatures, elevated levels of DMS formation in the landfill gas, and elevated levels of NMOC formation in the landfill gas and 2) solutions to slow and stop the reaction(s) in the landfill. Investigation into the cause of the alleged chemical reaction(s) shall include, but not be limited to, waste characterization study of waste disposed within the Reaction Area, to the extent records of such waste are within Respondent’s possession, including (but not limited to) analysis of chemical and physical characteristics, BTU, moisture content, biological methane potential. Respondent shall also conduct drill core sampling in the Reaction Area (as defined in Condition 9(a)) to assess waste characterization in areas not affected by elevated temperatures at the time of drilling. Respondent shall submit a report on the findings of the investigation by no later than December 8, 2023 to South Coast AQMD [Baitong Chen, Air Quality Engineer, (bchen@aqmd.gov); Nathaniel Dickel, Senior Air Quality Engineer, (ndickel@aqmd.gov), and Christina Ojeda, Air Quality Inspector, (cojeda@aqmd.gov)];
 - iii. An investigation and report on the feasibility and availability of a continuous community emission monitoring system to conduct continuous monitoring and provide estimates of DMS concentrations at the facility fenceline and within the affected community. By no later than December 1, 2023, Respondent shall submit to the South Coast AQMD [Baitong Chen, Air Quality Engineer, (bchen@aqmd.gov); Nathaniel Dickel, Senior Air

1 Quality Engineer, (ndickel@aqmd.gov), and Christina Ojeda, Air
2 Quality Inspector, (cojeda@aqmd.gov)], the feasibility and
3 availability findings of this fenceline and community DMS
4 monitoring program. The findings shall identify all companies,
5 vendors, contractors, and consultants that were inquired regarding
6 the feasibility and availability and the results for each inquiry,
7 including an ultimate decision if monitoring is feasible. If the
8 Reaction Committee deems monitoring under this provision
9 feasible, Respondent shall prepare and submit to the South Coast
10 AQMD [Baitong Chen, Air Quality Engineer, (bchen@aqmd.gov);
11 Nathaniel Dickel, Senior Air Quality Engineer,
12 (ndickel@aqmd.gov), and Christina Ojeda, Air Quality Inspector,
13 (cojeda@aqmd.gov)] a workplan for the installation of and
14 operation of the required monitoring equipment and related
15 installations within thirty (30) days of the Reaction Committee's
16 decision. This workplan will include a timeline for procurement of
17 monitoring equipment and for the commencement of monitoring.
18 It will also include a timeline for reporting out on the collected
19 data, including a proposal relating to the real-time posting of
20 monitoring data on Respondent's website or other regular report-
21 outs on the data;

- 22 iv. A study and report on landfill best management practices and
23 alternative methods to minimize the release of fugitive surface gas
24 and minimize odors from fugitive surface gas, including cover
25 practices at the Reaction Area (as defined in Condition 9(a)) and
26 working face, and how best to address related odorous emissions,
27 such as through the use of misting systems, fans, odor neutralizer,
28 or other means. By no later than November 6, 2023, Respondent

1 shall submit a report detailing the findings of this Fugitive Landfill
2 Gas Odor Mitigation Study and the proposals for the minimization
3 of landfill gas release and odors. This report shall be submitted to
4 South Coast AQMD [Baitong Chen, Air Quality Engineer,
5 (bchen@aqmd.gov); Nathaniel Dickel, Senior Air Quality
6 Engineer, (ndickel@aqmd.gov), and Christina Ojeda, Air Quality
7 Inspector, (cojeda@aqmd.gov)];

8 v. A report on the known health risks from acute and long-term
9 exposure to DMS, including any action levels from other public
10 health or government entities, and including a summary of
11 recommended actions for persons exposed to DMS for acute and
12 long-term durations. By no later than January 15, 2024,
13 Respondent shall submit this report to South Coast AQMD
14 [Baitong Chen, Air Quality Engineer, (bchen@aqmd.gov);
15 Nathaniel Dickel, Senior Air Quality Engineer,
16 (ndickel@aqmd.gov), and Christina Ojeda, Air Quality Inspector,
17 (cojeda@aqmd.gov)];

18 vi. A report of the health impacts from ongoing and long-term (e.g.
19 greater than one year) exposure to hydrogen sulfide (H₂S), or other
20 speciated sulfur compounds, and any other hazardous air pollutants
21 (HAPs), as defined in the federal Clean Air Act, 42 U.S.C. § 7412.
22 The HAPs evaluated in the report shall include those which are
23 detected: (1) in landfill gas over the past twelve months at the
24 Chiquita Canyon Landfill as documented in the initial or additional
25 flux chamber study (per Condition No. 12(f)) or detected in stack
26 emissions testing; (2) in the liquids and leachate samples collected
27 and analyzed (per Condition No. 37); (3) in air sampling performed
28 to determine emissions from exposed liquids/leachate; and (4) in

1 the community pursuant to the enhanced community air
2 monitoring program in exceedance of recommended toxicity
3 screening values published by the US EPA or other applicable
4 screening values where US EPA toxicity screening values are
5 unavailable. The report shall include, but not be limited to,
6 assessment and analysis of any action levels from other public
7 health or government entities in the United States for any such
8 constituents, recommended actions for persons exposed to such
9 constituents, and recommendations on how to limit any anticipated
10 adverse health impacts. Such report shall also include a summary
11 of all findings, health impacts and recommendations in an easy-to-
12 read format designed for distribution to and use by the public. By
13 no later than August 1, 2024, Respondent shall submit this report
14 to South Coast AQMD [Baitong Chen, Air Quality Engineer,
15 (bchen@aqmd.gov); Nathaniel Dickel, Senior Air Quality
16 Engineer, (ndickel@aqmd.gov), and Christina Ojeda, Air Quality
17 Inspector, (cojeda@aqmd.gov)]; and

18 vii. The development of a model to estimate the rate of liquid
19 generation in the landfill, and total quantity of liquid existing
20 within the landfill waste mass at any given time (including
21 supporting assumptions, references, and calculations). By no later
22 than June 25, 2024, Respondent shall submit to South Coast
23 AQMD a report summarizing the model and results of modeling.

24 1. Respondent shall update this model and submit to South
25 Coast AQMD [Baitong Chen, Air Quality Engineer,
26 (bchen@aqmd.gov); Nathaniel Dickel, Senior Air Quality
27 Engineer, (ndickel@aqmd.gov), and Christina Ojeda, Air
28 Quality Inspector, (cojeda@aqmd.gov)] a report

1 summarizing the updated model and results of modeling on
2 a semi-annual basis beginning on January 7, 2025 and
3 every six calendar months thereafter.

4 viii. The Reaction Committee, on behalf of Respondent, shall conduct
5 an investigation into the existing landfill gas collection and
6 conveyance piping materials (e.g. high-density polyethylene
7 (HDPE)), alternative landfill gas collection and conveyance piping
8 materials, and current landfill conditions to determine whether the
9 existing HDPE piping is appropriate for the current and expected
10 future temperature conditions at the landfill, and to determine
11 whether viable alternative landfill gas collection/conveyance
12 piping materials exist, which shall include investigation results of
13 materials used by other landfills that have experienced high
14 temperature events. The investigation shall include a study of the
15 material properties, specifications, and ratings and manufacturer's
16 operating properties of piping (e.g. HDPE) within a landfill,
17 including but not limited to, short term maximum manufacturer's
18 temperature rating, long-term manufacturer's maximum
19 temperature rating, effects and associated timeline of effects from
20 operating above manufacturer rated temperatures or specifications,
21 effects and associated timeline effects from consistent exposure of
22 piping to sunlight, ability to convey landfill gas with minimal
23 fugitive vapor leaks, and pliability for integrity of the system
24 during landfill settlement or other common landfill operations or
25 occurrences. These properties shall then be compared with several
26 landfill gas conveyance piping material alternatives. Respondent
27 shall submit a report on this investigation which includes the
28 details of the material and manufacturer operating properties and

1 specifications of piping (e.g. HDPE) and alternative piping as
2 specified above. It shall additionally detail existing and future
3 expected landfill gas temperatures within the landfill gas
4 conveyance piping, including expected temperatures within the
5 piping leaving the landfill gas extraction wells and within the
6 larger conveyance header within the Reaction Area. If applicable,
7 it shall additionally include an analysis on existing landfill gas
8 conveyance piping and future planned piping, and associated
9 piping lengths and diameters, which conveys or will convey
10 landfill gas above the existing HDPE piping's manufacturer rated
11 temperature threshold. Finally, the report shall include a
12 recommendation of the appropriate piping material to use moving
13 forward and when existing piping materials shall be replaced with
14 more robust materials or replaced with existing materials at higher
15 frequencies, at the landfill while the landfill is experiencing
16 elevated temperatures. This report shall be submitted by June 21,
17 2024 to South Coast AQMD [Baitong Chen, Air Quality Engineer,
18 (bchen@aqmd.gov); Nathaniel Dickel, Senior Air Quality
19 Engineer, (ndickel@aqmd.gov), and Christina Ojeda, Air Quality
20 Inspector, (cojeda@aqmd.gov)].

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

24 i. Respondent has conducted an initial flux chamber study pursuant to the direction of
25 the Los Angeles County Department of Public Health. Respondent shall conduct
26 landfill gas flux studies for, at a minimum, methane, non-methane organic
27 compounds ("NMOC"), speciated hydrocarbons (C2-C12), toxic air contaminants
28 (TAC) analyzed by EPA Method TO-15 (including acrolein and additionally at least

1 the ten highest concentration tentatively identified compounds), total reduced sulfur
2 (“TRS”), and speciated sulfur compounds to determine the surface flux throughout
3 the landfill starting with Quarter Four 2024 and once every four months thereafter.
4 The studies shall be conducted through the use of dynamic flux chambers oriented
5 at various locations throughout the landfill site, according to a South Coast AQMD
6 approved protocol. Respondent shall prepare a proposed protocol(s) for the studies
7 and shall submit the protocol(s) to South Coast AQMD [Baitong Chen, Air Quality
8 Engineer, (bchen@aqmd.gov); Nathaniel Dickel, Senior Air Quality Engineer,
9 (ndickel@aqmd.gov), and Christina Ojeda, Air Quality Inspector,
10 (cojeda@aqmd.gov)] for review and approval at least 75 days prior to the start of
11 the month in which the test is planned, unless otherwise approved in writing by
12 South Coast AQMD. A previous flux study protocol, reviewed and approved by
13 South Coast AQMD, may be used if the proposed testing will follow all aspects of
14 the prior South Coast AQMD approved protocol, with the exception of the
15 testing/sampling locations on site. Reports detailing the operational conditions,
16 methodology, quantity of tests and locations, sampling location determination,
17 sampling results, data analysis, emission results, discussion of the results, and
18 comparison of previous flux chamber test results to the current results shall be
19 submitted by no later than 45 days after the end of the month during which a test
20 was conducted, or no later than 90 days after South Coast AQMD approves the
21 protocol, whichever is later, to South Coast AQMD [Baitong Chen, Air Quality
22 Engineer, (bchen@aqmd.gov); Nathaniel Dickel, Senior Air Quality Engineer,
23 (ndickel@aqmd.gov), and Christina Ojeda, Air Quality Inspector,
24 (cojeda@aqmd.gov)], unless otherwise approved in writing by South Coast AQMD.
25 The initial flux study report, covering the flux study for the fourth quarter of year
26 2024, shall be submitted earlier than the schedule indicated above, by January 15,
27 2025 to South Coast AQMD [Baitong Chen, Air Quality Engineer,
28 (bchen@aqmd.gov); Nathaniel Dickel, Senior Air Quality Engineer,

1 (ndickel@aqmd.gov), and Christina Ojeda, Air Quality Inspector,
2 (cojeda@aqmd.gov)], unless otherwise approved in writing by South Coast AQMD.
3 Respondent shall provide notice of the test date for each test to South Coast AQMD
4 [Baitong Chen, Air Quality Engineer, (bchen@aqmd.gov); Nathaniel Dickel, Senior
5 Air Quality Engineer, (ndickel@aqmd.gov), and Christina Ojeda, Air Quality
6 Inspector, (cojeda@aqmd.gov)] at least 14 days prior to the scheduled test.

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

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

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

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

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

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

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

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

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

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

b. By January 6, 2025, unless otherwise approved in writing by the South Coast AQMD, Respondent shall install vertical landfill gas extraction wells in the initial Reaction Area (including the boundary of Cells 1/2A, 2B/3, 4, and Module 2B/3/4 P2 as defined in Condition 9(a)). These wells shall be fully operational, working wells, installed with desired depth within the landfill waste mass (approximately 30 ft from the bottom liner), with the ability to extract landfill gas within the depths of the landfill waste mass and deliver it to the gas control system(s). Respondent shall achieve a vertical gas extraction well density of wells installed at the desired depth, at a minimum, an average of three (3) wells per acre within the initial Reaction Area stated above, and within the estimated extent of elevated temperature landfill conditions as depicted by the Reaction Committee in their monthly determinations submitted in accordance with Condition 9(a). The wells with the desired depth shall be installed with even dispersion, achieving a well density of at least two (2) vertical extraction wells within any one acre, except for the areas demarcated in the attached Exhibit A to this Modified Stipulated Order. The following interim deadlines shall apply to this Condition 15(b) for wells installed with the desired depth:

- i. By July 1, 2024, installation of 50% of wells necessary to achieve the well installation density; and
- ii. By October 1, 2024, installation of 75% of wells necessary to achieve the well installation density.

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- iii. In the circumstance that vertical landfill gas extraction wells are incapable of being installed with the desired depth within the initial Reaction Area in accordance with the schedule specified above, due to the ongoing Reaction Area conditions, Respondent shall install the wells to the depths achievable at the densities specified in Condition No. 15(b)(i) above, and in accordance with the schedule specified in Condition Nos. 15(b), 15(b)(i) and 15(b)(ii). Respondent shall then achieve the well installation depth and density requirements of described above in Condition 15(b) by August 17, 2026, unless otherwise approved in writing by South Coast AQMD.
- iv. If any reading of 500 ppmv TOC or greater is detected during instantaneous surface monitoring required by Condition No. 10, corrective actions shall be taken by the Respondent within 2 calendar days after detecting the exceedance, including, but not limited to the following: cover maintenance or repair, or well vacuum adjustments. The location shall be remonitored no later than 10 calendar days after detecting the exceedance. If the remonitoring of the location shows a second exceedance, the Respondent shall install and operate the new and/or replacement well(s) no later than 30 days after detecting the initial exceedance, or otherwise approved in writing by South Coast AQMD.
- v. If any reading of 25 ppmv TOC or greater is detected during integrated surface sampling required by Condition No. 9, corrective actions shall be taken by Respondent within 2 calendar days after detecting the exceedance, including, but not limited to, the following: the gas collection equipment and the landfill cover shall be serviced in the vicinity of the grid with the exceedance

1 (e.g. cover maintenance or repair, or well vacuum adjustments).
2 The grid shall be resampled no later than 10 calendar days after
3 detecting the exceedance. If the resampling of the grid shows a
4 second exceedance, the Respondent shall install and operate the
5 new and/or replacement well(s) no later than 30 days after
6 detecting the initial exceedance, or otherwise approved in writing
7 by South Coast AQMD.

8 vi. An extension to the well installation timelines under Condition
9 15(b)(iv and v) above may be requested in writing, submitted to
10 South Coast AQMD [Baitong Chen, Air Quality Engineer,
11 (bchen@aqmd.gov); Nathaniel Dickel, Senior Air Quality
12 Engineer, (ndickel@aqmd.gov), and Christina Ojeda, Air Quality
13 Inspector, (cojeda@aqmd.gov)]. The extension request shall be
14 submitted at least 7 days prior to the 30-day well installation
15 deadline, and shall include, at a minimum, the instantaneous
16 surface monitoring and/or integrated surface sampling data,
17 corrective actions performed, date of all monitoring/sampling and
18 corrective actions performed, and detailed reasoning of equipment
19 delays, operational concerns, safety concerns, or other reasons
20 inhibiting the installation of the well(s) according to the 30-day
21 schedule.

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

1 steel shall be installed for any well which has gas temperatures exceeding
2 170 degrees Fahrenheit;

3 j. Following the installation of additional wells per Conditions 15(a) and
4 15(b), Respondent shall replace any wells in the Reaction Area which are
5 damaged, blocked, pinched, or which have gas temperatures exceeding
6 145 degrees Fahrenheit with CPVC wells, carbon steel, and/or stainless
7 steel wells, or add new wells that replace the landfill gas extraction
8 capacity. Within 7 days of discovery of any such well, Respondent shall
9 notify South Coast AQMD in writing [attn: Baitong Chen, Air Quality
10 Engineer, (bchen@aqmd.gov); Nathaniel Dickel, Senior Air Quality
11 Engineer, (ndickel@aqmd.gov), and Christina Ojeda, Air Quality
12 Inspector, (cojeda@aqmd.gov)] of a proposed installation schedule.
13 Installation shall take place within 7 days of the notification, whenever
14 feasible, but the schedule shall take into account availability of drilling
15 equipment, replacement materials, and weather and safety conditions.
16 Following initial notification, Respondent shall update South Coast
17 AQMD in writing every 7 days until the well installation is complete, with
18 evidence substantiating the delay, and additionally shall provide an
19 updated installation schedule.

20 k. Respondent shall, once additional/adequate gas extraction capacity is
21 installed, operate gas extraction wells with less than 3 percent oxygen
22 where feasible, and follow landfill best management practices to keep the
23 oxygen below 5 percent in interior wells;

24 l. Respondent shall install well boots seals on all wells in the Reaction Area
25 in accordance with the installation schedule for the geosynthetic cover that
26 is being installed pursuant to Condition No. 31 and consistent with
27 requirements of the Local Enforcement Agency;

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1 m. Respondent shall submit semi-annual as-built drawings in duplicate to the
2 South Coast AQMD [attn: Baitong Chen, Air Quality Engineer,
3 (bchen@aqmd.gov); Nathaniel Dickel, Senior Air Quality Engineer,
4 (ndickel@aqmd.gov), and Christina Ojeda, Air Quality Inspector,
5 (cojeda@aqmd.gov)]. As-built drawings shall depict all wells constructed
6 to date.

7 n. As of April 25, 2024, all new vertical extraction wells installed within the
8 Reaction Area (as defined in Condition 9(a)) shall be dual extraction wells
9 with the ability to extract both landfill gas and liquid/leachate within the
10 well, to maximize landfill gas collection and prevent liquid/leachate build-
11 up within wells and within the landfill. Dewatering pumps and associated
12 infrastructure (pneumatic supply piping, liquid forcemain piping, etc.)
13 shall be installed, allowing the pump at each well to be capable of
14 operation. For 75% of wells, installation of all associated infrastructure
15 shall be completed within 30 days of completion of the vertical extraction
16 well drilling operation. For the remaining 25% of wells, installation of all
17 associated infrastructure shall be completed within 60 days of completion
18 of the vertical extraction well drilling operation. This sub-condition shall
19 supersede the specific language listed in Condition No. 15 allowing
20 Respondent to evaluate and install vertical dual extraction wells as needed.

21 o. Respondent shall, on a monthly basis determine whether any of the
22 existing landfill gas collection wells in the Reaction Area (as defined in
23 Condition 9(a)), which were not able to be drilled and installed at the
24 desired well depth (generally approximately 30 ft above the bottom liner),
25 can be expanded deeper or drilled to achieve the initially desired depth, or
26 whether new replacement wells can be drilled nearby to achieve the
27 initially desired depth. This determination shall include an evaluation of
28 the landfill gas well/wellbore conditions, landfill liquid/leachate flow data,

1 pressurized liquid/leachate release data, and landfill gas data, wellhead
2 temperature data, temperature probe data, and any additional parameters
3 as necessary. Respondent shall report on the monthly determination, along
4 with any supporting evidence and reasoning for the determination, as part
5 of the monthly report pursuant to Condition No. 8, beginning with the
6 report submitted in October 2024 covering data from September 2024.

7 16. Respondent shall submit, by October 6, 2023, a complete permit modification application
8 for the Landfill Gas Collection System (under Permit G43917, A/N 578102) to increase the
9 number of permitted wells in the well field. The submittal shall be accompanied with a
10 complete Title V Revision application and shall be submitted with an expedited permit
11 processing request and associated required fees, forms, and information.

12 17. Respondent shall expeditiously dewater wells being impacted by liquids to the maximum
13 extent feasible, and shall take proactive measures to remove additional liquids in the
14 Reaction Area to limit the reaction severity and spread. This shall be accomplished through
15 the installation of dewatering sumps/pumps of at least 60 percent of the landfill gas vertical
16 extraction wells in the Reaction Area (as defined in Condition 9(a)) that are capable of
17 extracting liquids by March 15, 2024 unless otherwise determined infeasible per Condition
18 No. 17(a). below. Respondent shall provide updates in the monthly reports pursuant to
19 Condition No. 8.

20 a. In the event Respondent determines that the installation of dewatering
21 sump/pumps of at least 60 percent of the landfill gas vertical extraction
22 wells that are capable of extracting liquids to be infeasible, Respondent
23 shall provide detailed rationale and reasoning in the monthly report
24 submitted pursuant to Condition No. 8 and shall continue with
25 implementation of the dewatering guidelines pursuant to Condition No. 18
26 to remove liquids to the maximum extent possible.

27 18. Respondent shall, in addition to the installation of dewatering sumps/pumps specified in
28 Condition No. 17 above, within ninety (90) days of the issuance of the Initial Order, provide

1 proposed Reaction Area dewatering guidelines and implementation procedures for the
2 landfill to South Coast AQMD (Baitong Chen, Air Quality Engineer, (bchen@aqmd.gov);
3 Nathaniel Dickel, Senior Air Quality Engineer, (ndickel@aqmd.gov)) that include but are
4 not limited to the following:

- 5 a. Proposed methodologies and monitoring procedures that determine the level of
6 dewatering within the Reaction Area (as defined in Condition 9(a)) wells impacted
7 by liquid. Methods may include the measurement of the gas flow at each landfill
8 gas collection well impacted by liquids;
- 9 b. Use of dewatering pumps or other methods to remove liquids from Reaction Area
10 (as defined in Condition 9(a)) wells impacted by liquids;
- 11 c. An implementation plan for the use of dewatering pumps or other methods to
12 remove liquids from the Reaction Area wells impacted by liquids. The plan shall
13 include a list of wells in the Reaction Area and depth where liquids are expected to
14 impact landfill gas collection efficacy or be a concern, the proposed action to
15 remove the liquids, and the schedule for liquid removal. The implementation plan
16 shall also include pro-active measures, such as additional dewatering pumps, to be
17 installed at landfill gas collection wells where liquid impaction issues have not yet
18 occurred, but may be expected to occur.
- 19 d. Upgrades to the site leachate collection system as needed, including through the
20 addition of increased air compressor and/or drain line infrastructure;
- 21 e. Protocols for the pumping and monitoring of dewatering pumps and other such
22 methods to remove water from Reaction Area (as defined in Condition 9(a)) wells
23 impacted by liquids;
- 24 f. Well field liquid sounding in the Reaction Area (as defined in Condition 9(a)), and
25 a proposed schedule for conducting liquid sounding on a consistent basis;
- 26 g. A timeline for appropriate reporting on impacted wells;
- 27 h. The feasibility of integrity testing of all vertical gas wells in the Reaction Area (as
28 defined in Condition 9(a)) and a timeline and protocol for addressing any wells that

1 the integrity testing demonstrates are damaged or are exhibiting temperatures of at
2 least 170 degrees Fahrenheit; and

- 3 i. A timeline for implementation of appropriate dewatering procedures upon
4 discovery of wells impacted by liquids.

5 Respondent shall, within 14 calendar days of approval of this Order, revise the dewatering
6 guidelines according to the comments received by email on March 13, 2024, and re-submit
7 the revised dewatering guidelines to South Coast AQMD for final written approval. The
8 proposed Reaction Area dewatering guidelines and implementation procedures shall be
9 implemented within seven (7) days of South Coast AQMD approval, and shall be
10 implemented to the maximum extent feasible if Respondent's facility is encountering
11 leachate tank capacity shortages. If any conflict exists between any condition or
12 requirement of this Order and any part of the South Coast AQMD approved Dewatering
13 Guidelines, this Order shall take precedence over the approved Dewatering Guidelines and
14 Respondent shall submit revised Dewatering Guidelines that resolve such a conflict to
15 South Coast AQMD for final written approval.

- 16 19. Respondent shall submit, by October 6, 2023, a complete permit modification application
17 to the Landfill Gas Condensate and Leachate Collection/Storage System (under Permit
18 G66132, A/N 613131) to increase the landfill's liquid storage capacity. The submittal shall
19 be accompanied with a complete Title V Revision application and shall be submitted with
20 an expedited permit processing request and associated required fees, forms, and
21 information.

- 22 20. Respondent shall increase its landfill gas control capacity. Respondent has submitted a
23 permit application for a new 6,000 scfm ultra-low emissions landfill gas flare (Flare No. 3),
24 which is currently in a public comment period. Once the flare is fully permitted and fully
25 operational equipment is received, Respondent shall have forty-five (45) days to finish
26 installation and begin operating the new landfill gas flare unless the circumstances outlined
27 in Condition No. 20(a) apply. Respondent shall notify the South Coast AQMD that the new
28 landfill gas flare is operational within 48 hours of beginning operation (Baitong Chen, Air

1 Quality Engineer, (bchen@aqmd.gov); Nathaniel Dickel, Senior Air Quality Engineer,
2 (ndickel@aqmd.gov), and Christina Ojeda, Air Quality Inspector, (cojeda@aqmd.gov)).

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

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

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

21 23. Respondent shall continue to use one or both 4,000 scfm flares (under Permit No. G73696,
22 A/N 645450) when the Reaction Committee determines that such use is necessary due to
23 insufficient flaring capacity or other such necessity-based situations, until the third new
24 6,000 scfm ultra-low emissions flare (Flare No. 5) referenced in Condition No. 70(a) is
25 permitted and operational.

26 24. Respondent shall operate and maintain the landfill so as to prevent standing leachate and
27 the pooling or ponding of leachate exposed to atmosphere throughout the facility. If pooling
28 or ponding of liquid/leachate is occurring, safety permitting, the liquid/leachate shall be

1 immediately collected and contained in a sealed tanker truck or leachate tank that minimizes
2 emissions, or repairs promptly performed to redirect leachate into the leachate collection
3 system.

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

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

23 27. Respondent shall conduct the following actions and report them to South Coast AQMD
24 [Baitong Chen, Air Quality Engineer, (bchen@aqmd.gov); Nathaniel Dickel, Senior Air
25 Quality Engineer, (ndickel@aqmd.gov), and Christina Ojeda, Air Quality Inspector,
26 (cojeda@aqmd.gov)] in each monthly report submitted pursuant to Condition No. 8
27 beginning with the report due on February 19, 2024:
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- a. Measure and record the leachate temperature within all the 6-inch leachate pipes feeding into the onsite frac tanks, and at the piping leading into the tanks at all tank farms. The temperature measurements reported shall include a map clearly indicating temperature monitoring location(s), and the reported results shall clearly state which tank(s) or tank farm(s) are downstream of the monitoring location, receiving the measured leachate;
- b. Respondent shall have dedicated staff or a contractor conduct and document inspections twice each calendar day, once in the morning, completing the inspection prior to 10 am, and once in the afternoon, starting the inspection at 1 pm at the earliest. The inspections shall begin with the surface of the Western and Northern slopes of the Reaction Area for liquid/leachate seepage and pooling and shall additionally consist of inspecting the facility's stormwater channel(s), and the facility's stormwater basin(s). Respondent shall maintain records from each inspection that include the details of any leachate seepage and pooling, including location(s) (identified on graphic map(s) of the landfill, with the subject landfill surface grid, and GPS coordinates), time discovered, estimated duration of presence of leachate at such locations, the characteristics of the leachate (estimated quantity in gallons, extent of area impacted in square footage, odor type and intensity), the leachate saturation level of surrounding soils (standing free liquid, saturated, semi-dry, dry), and additional containment systems or measures deployed to route, collect, and contain the exposed leachate and prevent further leachate exposure
 - i. In the event that two weeks of twice daily inspections show no exposed liquid/leachate seepage or pooling, Respondent may reduce the inspection frequency to once daily. If after another two weeks of daily inspections, no exposed liquid/leachate seepage or

1 pooling is observed, Respondent may reduce the inspection
2 frequency to once every other day during the operating week (i.e.,
3 three times each operating week). If at any point inspections show
4 exposed liquid/leachate seepage or pooling, inspection frequency
5 shall return to twice daily inspections.

6 c. On a weekly basis, compile and report the details of the inspection logs
7 from that calendar week required under Condition 27(b). Respondent shall
8 additionally report on any ongoing leachate seepage and pooling at the
9 landfill, found to have occurred at a location more than once within the
10 calendar week, including location(s) (identified on graphic map(s) of the
11 landfill), estimated duration of presence of leachate at such locations,
12 characteristics of leachate (estimated quantity, extent of area impacted,
13 odor type and intensity), leachate saturation of surrounding soils (standing
14 free liquid, saturated, semi-dry, dry), and containment systems or
15 measures deployed to route, collect, and contain the exposed leachate and
16 prevent further leachate exposure. By no later than January 23, 2024,
17 Respondent shall submit to South Coast AQMD [Baitong Chen, Air
18 Quality Engineer, (bchen@aqmd.gov); Nathaniel Dickel, Senior Air
19 Quality Engineer, (ndickel@aqmd.gov), and Christina Ojeda, Air Quality
20 Inspector, (cojeda@aqmd.gov)], the first weekly report, and shall submit
21 an additional weekly report every 7 calendar days thereafter;

22 d. Measure and record quantities of leachate sent off-site for
23 disposal/treatment during the previous week for so long as all leachate is
24 transported offsite for disposal. Records shall include the associated
25 company name and physical address of the off-site disposal/treatment
26 facility(ies) that receive leachate generated by the landfill. If Respondent
27 begins onsite treatment, it shall also record on a weekly basis quantities of
28 leachate collected and leachate treated onsite. Respondent shall report this

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information in the monthly reports pursuant to Condition 8(c). Respondent shall submit copies of the manifests to South Coast AQMD within three weeks of request.

- e. Respondent shall report to South Coast AQMD any leachate leak or spill separately from leachate seeps reports specified in Condition 27(c). The report shall be submitted to South Coast AQMD [Baitong Chen, Air Quality Engineer, (bchen@aqmd.gov); Nathaniel Dickel, Senior Air Quality Engineer, (ndickel@aqmd.gov), and Christina Ojeda, Air Quality Inspector, (cojeda@aqmd.gov)] within 48 hours of discovering the leak or spill. The report shall, at a minimum, include (1) the date and time of the leak or spill; (2) area designation inspected; (3) the name of the person that discovered the leak or spill; (4) written acknowledgement that they did, or did not, take corrective action with rationale for these actions; (5) a root cause analysis on why and how the leak or spill occurred; (6) the estimated quantity of the leak or spill; (7) corrective actions to clean and/or remove the leak or spill; (8) corrective actions implemented or to be implemented, including an estimated timeline, to prevent future recurrence; (9) the type of affiliation of the operator involved in the root cause (e.g., employee, regularly onsite contractor, other contractors, or haulers); (10) whether any individuals involved in the root cause had previously received training on applicable operations to avoid leaks or spills; and (11) the number of times individuals involved in the root cause had previously been involved in the root cause of a leachate leak or spill. If any of the above items are not able to be determined, Respondent shall list “not determined” and a brief explanation. Root cause shall include ultimate determination of attribution of error, including, as applicable, operator error, equipment breakdown, equipment malfunction, lack of training, lack of documented procedures, lack of following procedures, etc, to the extent known at the time the report

1 is submitted to South Coast AQMD after good faith investigation. For
2 spills or leaks of greater than 100 gallons where root cause was not
3 determined at the time of report submission, Respondent shall provide a
4 supplement to the report following completion of investigation and
5 determination of the root cause.

6 f. Respondent shall develop Standard Operating Procedures (SOPs) for
7 leachate tank operations in accordance with industry standards and best
8 management practices, to prevent leachate tank overflow, failure, and
9 spillage in the tank farm areas. Respondent shall additionally conduct daily
10 inspections of leachate tanks, tank connections, ports, valves, tank hoses,
11 and any other equipment associated with leachate tank filling/emptying
12 operations, to determine equipment condition material integrity, to prevent
13 leaks. The SOPs shall be submitted to South Coast AQMD for review and
14 approval [Baitong Chen, Air Quality Engineer, (bchen@aqmd.gov);
15 Nathaniel Dickel, Senior Air Quality Engineer, (ndickel@aqmd.gov), and
16 Christina Ojeda, Air Quality Inspector, (cojeda@aqmd.gov)], by no later
17 than September 23, 2024, unless otherwise approved in writing by South
18 Coast AQMD. The SOPs shall be implemented within 7 days of South
19 Coast AQMD approval.

20 i. Respondent shall revise the SOPs developed under Condition No.
21 27(f) to include instructions for leachate tanker truck operations,
22 as applicable to the leachate tank farms installed on site, in
23 accordance with industry standards and best management
24 practices. The goal of these revisions shall be to prevent leachate
25 overflow, leaks, spillage, equipment failure, operator error, and to
26 prevent and minimize any other exposure of leachate and leachate
27 vapors to atmosphere in and around the tank farm areas. The
28 revised SOPs shall be submitted to South Coast AQMD for review

1 and approval [Baitong Chen, Air Quality Engineer,
2 (bchen@aqmd.gov); Nathaniel Dickel, Senior Air Quality
3 Engineer, (ndickel@aqmd.gov), and Christina Ojeda, Air Quality
4 Inspector, (cojeda@aqmd.gov)], by no later than January 9, 2026,
5 unless otherwise approved in writing by South Coast AQMD. The
6 revised SOPs shall be implemented upon submission. Should
7 South Coast AQMD provide any comment(s) on these revised
8 SOPs or any subsequent revised SOPs, Respondent shall
9 incorporate South Coast AQMD comments and submit further
10 revised SOPs, or shall provide detailed justification for not
11 incorporating comments, to South Coast AQMD within 15 days of
12 receipt of the comments.

13 ii. Respondent shall review and revise the SOPs as needed, but at least
14 every 6 months, according to any changes in leachate tank
15 operations, and with consideration of root cause analyses for spills
16 and/or leaks under Condition No. 27(e)(5), with consideration for
17 corrective actions implemented or to be implemented under
18 Condition No. 27(e)(8), and with consideration of any South Coast
19 AQMD comments. Revised SOPs shall be submitted to South
20 Coast AQMD for review and approval at least every 6 months, and
21 shall include redlined and clean versions. Revised SOPs shall be
22 implemented upon submission. Should South Coast AQMD
23 provide any comments on these revised SOPs or any subsequent
24 revised SOPs, Respondent shall respond and/or provide further
25 revised SOPs to South Coast AQMD within 15 days of receipt of
26 the comments.

27 g. Respondent shall not overflow leachate collection/storage tanks or liquid
28 treatment tanks.

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

14 29. Respondent shall ensure it has proper landfill leachate and landfill gas condensate capacity
15 (based on liquid production and collection reporting pursuant to Condition 8) to accumulate
16 onsite and/or dispose of collected liquids/leachate at an appropriate facility or facilities.
17 Respondent shall comply with the Leachate Management Plan approved by the EPA and
18 submitted to the South Coast AQMD pursuant to Condition No. 64, which includes
19 contingency measures such as whether it is appropriate to reduce pumping operations in
20 case of an emergency.

21 **Landfill Cover**

22 30. Respondent shall visually inspect the landfill cover and geosynthetic cover(s) in and around
23 the Reaction Area (as defined in Condition No. 9(a)), and any additional geosynthetic cover
24 installed on site, each operating day and shall promptly repair any cover issues identified,
25 which may include adding and spreading of clean soil, wetting, retracking any damaged
26 area, and repairing or resealing of the geosynthetic cover. Any repair of the geosynthetic
27 cover which includes addition of material to add or replace to the existing cover shall be
28 done using an EVOH, or, if EVOH is unavailable and repair is on or before three months

1 from the date DTSC approves the EVOH, an HDPE geomembrane. The EVOH or HDPE
2 geomembrane shall be of at least 60 mil thickness continuously seamed and continuously
3 welded to the existing 30 mil HDPE geomembrane. All repair and correction actions to the
4 landfill cover, and interim repair of geosynthetic cover shall be conducted promptly and no
5 later than two hours after identification during inspection, safety permitting. Permanent
6 repair of geosynthetic cover shall be scheduled immediately and shall take place as soon as
7 possible following identification of cover issue. Respondent shall maintain a log
8 demonstrating that it has addressed any damages to the landfill cover or geosynthetic cover,
9 including the date the damage was identified, the action taken to repair the damage, and the
10 time at which the repair was completed. Results of the daily inspection and the repair log
11 required by this condition shall be included in the monthly reports required pursuant to
12 Condition No. 8.

- 13 31. Respondent shall install a geosynthetic cover over western portions of Module 2B/3/4 Phase
14 2, Module 2B/3, and Module 4 to limit the migration of landfill gas from the site.
15 Respondent shall submit the completed design for the cover, which will provide greater
16 definition to the cover location, including associated landfill gas extraction infrastructure
17 to be installed underneath the cover, to the South Coast AQMD by September 12, 2023
18 (Baitong Chen, Air Quality Engineer, (bchen@aqmd.gov); Nathaniel Dickel, Senior Air
19 Quality Engineer, (ndickel@aqmd.gov), and Christina Ojeda, Air Quality Inspector,
20 (cojeda@aqmd.gov)). Respondent shall then obtain and install the geosynthetic cover
21 material of at least 30 mil thickness. Respondent shall notify South Coast AQMD by
22 October 31, 2023 (Baitong Chen, Air Quality Engineer, (bchen@aqmd.gov); Nathaniel
23 Dickel, Senior Air Quality Engineer, (ndickel@aqmd.gov), and Christina Ojeda, Air
24 Quality Inspector, (cojeda@aqmd.gov)) on the progress of procuring and installing the
25 geosynthetic cover. Respondent shall include updates on the procurement and installation
26 of the geosynthetic cover in the monthly reports pursuant to Condition No. 8.

27 **Ambient Air, Leachate & Emissions Monitoring**

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

18 a. The report shall include a recommendation on whether additional modeling is
19 recommended to fully address the current odor circumstances at the landfill and
20 potential odor impacts on the nearby community.

21 b. If such additional modeling is recommended by the Reaction Committee, the
22 Reaction Committee shall, within 45 days of providing the report and
23 recommendation, provide a proposal to the South Coast AQMD that shall, at a
24 minimum, include the following:

25 i. The identification and qualifications of the primary personnel
26 and/or firms proposed to conduct the study, as well as the specific
27 techniques and location(s) where the study will be conducted;

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ii. A timeline for completion of the study and submittal of the final written reports to South Coast AQMD no later than 150 days after South Coast AQMD approval of the study proposal.

c. Since the Reaction Committee recommended additional modeling, Respondent shall, within 14 calendar days of approval of this Order, revise the air modeling study proposal according to the comments received by email on March 28, 2024, and re-submit the revised proposal to South Coast AQMD for approval. Respondent shall submit a final written report on the additional modeling to South Coast AQMD by September 2, 2024 or 90 days following approval of the air modeling study proposal by South Coast AQMD, whichever is later.

33. Respondent shall follow the direction of DPH to expand and enhance its current ambient air monitoring program to include DMS and other constituents of landfill gas, sampling at residential locals where recent odor complaints have been reported and at on-site locations where odors are most pronounced, and to conduct a flux chamber study (the “initial” flux chamber study discussed in Condition No. 12(i)). Any reports submitted to DPH related to these studies shall also be submitted to the South Coast AQMD (Baitong Chen, Air Quality Engineer, (bchen@aqmd.gov); Nathaniel Dickel, Senior Air Quality Engineer, (ndickel@aqmd.gov), and Christina Ojeda, Air Quality Inspector, (cojeda@aqmd.gov)).

34. By January 19, 2024, Respondent shall provide South Coast AQMD with access to all real-time continuous monitoring data for PM2.5, PM10, and H2S recorded at all monitoring stations (MS-01 through MS-12, and any subsequent additional monitoring stations). Respondent shall by January 19, 2024 or within 5 calendar days after enhanced monitors are brought online, provide South Coast AQMD with access to all real-time continuous monitoring data for total reduced sulfur (TRS) and toxic air contaminants (TAC) recorded by the enhanced monitors (MS-04, MS-12, and any additional enhanced monitors thereafter, including additional monitors as required by Condition No. 36.).

a. Within 30 days of this issuance of this Modified Order, Respondent shall ensure that the weekly 24-hour time-integrated canister samples for benzene, continuous H2S,

1 and methane, and all hourly microGC DMS and VOC concentration data from current
2 and future fence line and community monitoring sites are posted to and accessible at
3 the webpage created pursuant to Condition 39 for public access, displayed in an easy
4 to read graphical format plot with compound concentration (y-axis) in parts per billion
5 volume (ppbV) vs. time (x-axis) in DD/MM/YYYY HH:MM format, which is simple
6 to review and understand. The compounds concentration data displayed in the
7 graphical plot in ppbV shall be plotted based on the finalized data as reported by the
8 testing laboratory or monitoring device ensuring all significant figures are preserved
9 and without rounding. The display shall allow the public to determine the 24-hour
10 time-integrated canister samples for benzene, continuous H₂S and methane, and
11 hourly microGC DMS and VOC concentrations, and the geographic location where
12 the concentration is monitored. The graphical format plot shall additionally reference
13 and display a horizontal dotted or dashed line for each compound's respective
14 Reference Exposure Level (REL) (as applicable) established by California Office of
15 Environmental Health Hazard Assessment (OEHHA): (1) the acute 1-hour OEHHA
16 REL for H₂S, which is the same as the state-level standard for this compound (30
17 ppb), and (2) the acute 1-hour OEHHA REL for benzene (8 ppb). An intuitive
18 mechanism (e.g., a link) to download historical data (for each data source) in a
19 compiled, usable format (such as .csv) should be provided and made publicly
20 accessible on the webpage created pursuant to condition 39 – including full analytical
21 results of the 24-hour time-integrated canister samples, continuous monitoring data
22 for H₂S and methane (including meteorological data), and the hourly DMS and VOC
23 results for all microGC instruments.

- 24 i. Real-time data shall include, but not be limited to, chronological one-hour
25 average H₂S concentrations as time series at each monitoring location. Wind
26 speed and direction shall also be included, if currently monitored by
27 Respondent.
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- ii. The website shall include a map which clearly marks the location of each air monitoring station.
- b. Within 30 days of this issuance of this Order, weekly data (from Saturday at 12:00 am to Friday at 11:59 pm) collected by these monitors shall be made available on the webpage created pursuant to Condition No. 39, in a manner which allows for user defined data download, no later than the following Monday at 5:30 pm. Data from these monitors shall be kept on file and made available to South Coast AQMD personnel upon request.
 - i. In the event of unexpected downtime of a monitor, bump tests, maintenance, or other scenario which may result in missing data or test data being recorded, by March 29, 2024, Respondent shall provide flags or other visual indicators on its website (created pursuant to Condition No. 39) for each data point/set that clearly indicate and document the range of dates/times with the missing or affected data, and indicate the reason for the missing or affected data.
- c. Respondent shall, by April 30, 2024, retain a third party to develop and install a system that provides automatic electronic notification via email for any exceedance of the applicable 1-hour NAAQS, CAAQS, or acute 1-hour OEHHA REL, whichever is lower (both in time and concentration) based on a time weighted average for benzene and H2S monitored in real-time by Respondent's monitoring network within the surrounding community (MS-06 through MS-12) by May 30, 2024. Additionally, by September 23, 2024, Respondent, through its retained contractor, shall develop and install a system allowing identical electronic notification via email for any exceedance of the applicable 1-hour NAAQS, CAAQS, or acute 1-hour OEHHA REL, whichever is lower (both in time and concentration) based on a time weighted average for benzene and H2S monitored in real-time by Respondent's monitoring network surrounding the Landfill (MS-01 through MS-05). Such systems shall also provide an automatic electronic notification once the applicable time weighted average falls below the applicable REL. By December 31, 2025, the third party shall

1 revise the system to provide an automatic electronic notification every hour during
2 which the applicable time weighted average continues to be above the applicable
3 REL. The template for all notifications shall be written in coordination with and
4 approved by South Coast AQMD. Respondent shall be responsible for the third party
5 including in such system a method for members of the public to sign up to receive
6 such notifications without any personally identifying information (including email
7 address) being disclosed to Respondent. Respondent shall be responsible for the third
8 party putting into effect the notification system within three business days of direction
9 from South Coast AQMD.

10 i. By December 31, 2025, Respondent shall retain a third party to develop a
11 system that allows for the electronic notifications defined in Condition 34(c)
12 to be distributed via text message. Respondent shall be responsible for the
13 third party including in such system a method for members of the public to
14 sign up to receive such notifications without any personally identifying
15 information (including phone numbers) being disclosed to Respondent.
16 Respondent shall be responsible for the third party putting into effect the
17 notification system within three business days of direction from South Coast
18 AQMD.

19 d. Respondent shall investigate any measurement which results in an exceedance
20 notification being distributed as defined in Condition 34. The investigation should
21 include a review of meteorological conditions in the area near the exceedance event,
22 review of monitors downwind of the exceedance event, review of landfill activity that
23 may have contributed to the exceedance event (e.g. nearby construction, traffic, cracks
24 in soil, tears in liner, flare downtime, etc.), review of recent activity at the monitoring
25 site for any correlation with the exceedance measurement, review of other
26 environmental factors that may have impacted the measurement, and review of any
27 instrument data and data validation/invalidation recommendation(s) provided by the
28 instrument vendor. Within one business day, Respondent shall submit to South Coast

1 AQMD [attn: Stephen Dutz, sdutz@aqmd.gov; Kathryn Roberts,
2 kroberts@aqmd.gov; Mary Reichert, mreichert@aqmd.gov] a preliminary report of
3 its investigation and findings. Full documentation of the above investigation shall be
4 submitted to South Coast AQMD [attn: Stephen Dutz, sdutz@aqmd.gov; Kathryn
5 Roberts, kroberts@aqmd.gov; Mary Reichert, mreichert@aqmd.gov] within four
6 business days, noting any remediation activity or corrective action that took place,
7 along with recurrence minimization if the measurement is found to be invalid.

8 e. By December 31, 2025, Respondent shall retain sufficient third-party support to
9 ensure that all CH₄, H₂S, PM, and meteorological sensors meet data quality
10 objectives identified by the instrument vendor or outlined in the standard operating
11 procedures or quality assurance documentation; and are maintained, calibrated, and
12 replaced in accordance with the instruments' standard operating procedures or quality
13 assurance documentation. For any measurement that results in an exceedance
14 notification being distributed as defined in Condition No. 34, the entity/ies must also
15 provide instrument data and a data validation/invalidation recommendation to
16 Respondent sufficient for Respondent to meet the time frames allotted by Condition
17 34(d) above.

18 f. By December 31, 2025, Respondent shall retain sufficient third-party support to
19 ensure that all microGC instruments meet data quality objectives identified by the
20 instrument vendor or outlined in the standard operating procedures or quality
21 assurance documentation; and are maintained, calibrated, and replaced in accordance
22 with the instruments' standard operating procedures or quality assurance
23 documentation. For any measurement that results in an exceedance notification being
24 distributed as defined in Condition No. 34, the entity/ies must also provide instrument
25 data and a data validation/invalidation recommendation to Respondent sufficient to
26 meet the time frames required by Condition 34(d).

27 35. Respondent shall, by January 19, 2024, provide all standard operating procedures (SOPs)
28 and any other Quality Control and Quality Assurance (QA/QC) documents describing the

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

13 a. Respondent shall provide South Coast AQMD with the same access that Respondent
14 has to on-site and off-site monitoring equipment. With respect to on-site monitoring
15 equipment, Respondent may require all visitors, including South Coast AQMD staff,
16 to don appropriate personal protective equipment. Upon request by South Coast
17 AQMD, Respondent shall, within 24 hours, provide a list of all personal protective
18 equipment that Respondent deems appropriate for accessing the monitoring
19 equipment. Respondent shall not prohibit South Coast AQMD staff from access to
20 Respondent's facility, including the monitoring equipment, if South Coast AQMD
21 staff don all personal protective equipment included on a list issued by Respondent
22 pursuant to this condition. With respect to off-site monitoring equipment, South Coast
23 AQMD shall arrange permission from third-party property owners for access, if
24 necessary, and Respondent shall provide access to equipment and accompany South
25 Coast AQMD personnel.

26 b. Respondent shall implement quality control measures (such as span and blank checks,
27 calibration, etc.) as specified by South Coast AQMD to ensure the accuracy of their
28 monitoring network within 30 days of notification.

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- i. If, following receipt of notification from South Coast AQMD, Respondent disputes the need to take one or more specified quality control measures, Respondent shall submit a response letter to the South Coast AQMD (attn: Stephen Dutz, sdutz@aqmd.gov) not later than 20 days prior to the time for implementation which details the dispute or objection, including provision of supporting evidence as applicable. Respondent shall further propose not less than 3 potential time slots for a virtual meeting during South Coast AQMD business hours where appropriate staff or consultants from Respondent are able to discuss the matter with South Coast AQMD.
- ii. If Respondent follows the procedures outlined in Condition No 35(b)(i) above, the deadline for implementing the disputed quality control measures shall be delayed until a further deadline is set by South Coast AQMD in a response determination.
- iii. If EPA requires Respondent to take any action that is inconsistent with quality control measures specified by South Coast AQMD under this Condition 35(b) with respect to the MicroGCs, Respondent shall immediately contact the South Coast AQMD [attn: Steven Dutz, sdutz@aqmd.gov; Kathryn Roberts, kroberts@aqmd.gov; Mary Reichert, mreichert@aqmd.gov] and describe the inconsistency. Respondent shall endeavor to resolve the inconsistency with the Executive Officer, while adhering to the measures specified by EPA.

36. Respondent shall, by May 1, 2024, install and maintain instrumentation within the nearby residential community, at sites MS-10 and MS-12, as defined in Respondent’s existing Community Air Monitoring Program. These instruments shall be capable of measuring hourly concentrations of benzene, toluene, ethylbenzene, xylenes, and other relevant volatile organic compounds (VOC) with site surface emissions greater than 1 ton/year, as indicated in Table 5.5 of the Chiquita Canyon Landfill Assessment of Air Emissions from Landfill Surfaces Report dated October 2023. While long-term solutions for permanent

1 power are implemented and any necessary permits and approvals by regulatory agencies
2 for permanent power are obtained, these instruments will be installed and put into operation
3 using temporary power to allow for continuous measurements of all volatile organic
4 compounds required. It is recognized that the use of temporary power may not guarantee
5 the uninterrupted operation of these instruments. Respondent shall develop a monitoring
6 plan that utilizes reliable and field-proven instrumentation, such as a micro gas
7 chromatograph (MicroGC) with pre-concentration, and seek approval from South Coast
8 AQMD. Respondent shall request and pay for expedited processing of all permits and
9 procurement of the instruments, if available. To ensure Respondent is on schedule to
10 complete installation within the 75 days, Respondent shall provide the South Coast AQMD
11 (attn: Kathryn Roberts, kroberts@aqmd.gov; Mary Reichert, mreichert@aqmd.gov) an
12 update at intervals of 30 days and 60 days from the issuance of the Order. Respondent shall
13 specifically address whether it believes an extension is necessary and provide supporting
14 documentation if it is seeking such extension. The AQMD may grant an extension of up to
15 60 days as appropriate based on the evidence submitted.

- 16 a. Upon installation, data from these instruments shall be made available to
17 the public via the publicly accessible webpage detailed in Condition No.
18 34. The display shall additionally reference and display the acute 1-hour
19 Reference Exposure Levels (RELs) for any compounds with established
20 acute exposure limits by California Office of Environmental Health
21 Hazard Assessment (OEHHA).
- 22 b. Until installation of the additional instrumentation is complete,
23 Respondent shall increase the number of 24-hour time integrated canister
24 sampling and analysis taken and analyzed for VOCs at MS-06 through
25 MS-12 to three times per week.
- 26 c. By the time of the status hearing contemplated in Condition No. 93, or
27 unless otherwise approved in writing by South Coast AQMD, the
28 MicroGCs installed pursuant to Condition No. 36 shall also be capable of

1 measuring hourly concentrations of acrolein. The South Coast AQMD has
2 requested EPA concurrence on the addition of acrolein; if EPA does not
3 concur, the parties will address this provision at the status hearing
4 contemplated in Condition No. 93.

5 d. Respondent shall promptly (by March 31, 2026, unless otherwise
6 approved in writing by South Coast AQMD) procure an additional
7 microGC instrument package and two additional sensor modules to be
8 used as spares. The instrument should be maintained in operational
9 condition and be available for immediate deployment once determined that
10 a monitoring network instrument has failed.

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

21 38. Respondent shall take at least one representative monthly sample of liquids from the
22 Reaction Area of the Landfill and at least one representative monthly sample of leachate
23 from the bottom tanks where liquids/leachate from the entire Landfill collect and analyze
24 them per U.S. EPA Method 624.1 for the presence of volatile organic compounds (VOCs)
25 and toxic air contaminants (TACs). In the event that Respondent demonstrates, to the
26 satisfaction of South Coast AQMD, that generated liquid/leachate is sufficiently collected
27 with no remaining seepage or potential for discharges of pressurized leachate, then the
28 leachate sampling and analysis shall be reduced to a quarterly schedule. If further leachate

1 seepage or discharges of pressurized leachate are found to occur, resulting in the exposure
2 of the liquid/leachate to atmosphere, then the sampling and analysis shall return to a
3 monthly schedule. Respondent shall, within 1 week of receipt from the contract laboratory,
4 post the analytical results on Respondent's website, and provide to South Coast AQMD
5 along with a detailed description and depiction of the sampling locations (Baitong Chen,
6 Air Quality Engineer, (bchen@aqmd.gov); Nathaniel Dickel, Senior Air Quality Engineer,
7 (ndickel@aqmd.gov), and Christina Ojeda, Air Quality Inspector, (cojeda@aqmd.gov)).

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9 **Community Outreach**

10 39. Respondent shall continue to maintain and update regularly (on a weekly basis) a dedicated
11 page of its website with a highly visible link on its homepage (the "odor mitigation section")
12 for presenting information discussing odor mitigation at CCL. Such webpage shall include
13 all information in English and Spanish. Subsequent reports posted on the webpage shall be
14 sent to a translation service within 2 business days of posting on the webpage, and shall be
15 translated and uploaded to the webpage within 2 business days of receipt from translation
16 service. Such webpage shall also meet the following requirements:

- 17 a. The odor mitigation webpage shall be accessible via a direct hyperlink included on
18 the homepage of CCL's website (<https://chiquitacanyon.com>), via a clickable link
19 with text stating "Odor Mitigation;"
- 20 b. The odor mitigation webpage shall display prominently at the top of the page a
21 notification that complaints of any odors believed to be caused by CCL can be made
22 to CCL (24-Hour Hotline) at (661) 253-5155;
- 23 c. The odor mitigation webpage shall display prominently at the top of the page a
24 notification that complaints may also be submitted to the South Coast Air Quality
25 Management District via telephone at 1 (800) CUT-SMOG or 1 (800) 288-7664 or
26 online on South Coast AQMD's website (which shall hyperlink to the following:
27 <http://www3.aqmd.gov/webappl/complaintsystemonline/NewComplaint.aspx>);

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

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

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

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

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

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

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

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

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

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

11 **Rule 1150 Landfill Excavation**

- 12 41. Respondent shall submit, by January 30, 2024, a complete plan application for a Rule 1150
13 Landfill Excavation Plan. The submittal shall be accompanied with a complete Title V
14 Revision application and shall be submitted with an expedited processing request and
15 associated required fees, forms, and information. A generic Rule 1150 plan application and
16 Title V Revision application shall include the following:
- 17 a. A signed and completed Form 400-A.
 - 18 b. A signed and completed Form 400-CEQA.
 - 19 c. Reason for excavation.
 - 20 d. A site summary indicating the site history.
 - 21 e. A list of materials buried or suspected materials buried in the site based on available
22 records.
 - 23 f. Results of any boring tests done to characterize the disposal site.
 - 24 g. Results of recent landfill gas analysis or soil vapor phase analysis including the
25 concentrations of methane, sulfur compounds, and speciated non-methane
26 hydrocarbons.
 - 27 h. A plot plan indicating the location of the excavation, staging areas, vehicle route(s),
28 vehicle cleaning area, and any nearby buildings, roadways, or other site identifying

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

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

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

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

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

- 10 i. Company Name and Company ID
- 11 ii. Site Address
- 12 iii. Notification Type (2 days prior or 5 days after)
- 13 iv. Estimated Excavation Start Date and Completion Date
- 14 v. A Map of the Facility with Excavation Location Indicated

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

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

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

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

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

3 f. During excavation, all working excavation areas, excavated material and unpaved
4 roadways shall be watered down until the surface is moist and then maintained in a
5 moist condition to minimize dust and emissions without creating a safety hazard
6 condition.

7 g. VOC contaminated soil (as defined by Rule 1166) shall not be spread onsite or
8 offsite, nor stockpiled, if it results in uncontrolled evaporation of VOC to the
9 atmosphere. VOC contaminated soil shall not be used for landfill cover.

10 h. During excavation, monitoring for Total Organic Compounds as methane using an
11 Organic Vapor Analyzer (OVA) or other monitor approved by the South Coast
12 AQMD shall be conducted continuously at the working face of the excavation and
13 at the downwind property line or other approved locations. The maximum sustained
14 readings (greater than 15 seconds) shall be recorded every 15 minutes. The OVA
15 or other approved monitor shall be calibrated each day in accordance with
16 manufacturers' specifications.

17 i. If the OVA or other approved organic monitor shows a sustained reading (greater
18 than 15 seconds) of 2,000 ppmv Total Organic Compounds as methane or greater
19 at the working face of the excavation, the excavation shall cease and the area
20 generating the emissions shall immediately be completely covered with a minimum
21 of 6 inches of clean dirt, plastic sheet, or other South Coast AQMD approved cover.
22 Excavation shall not resume until the readings return to the pre-excavation level.

23 j. If the OVA or other approved organic monitor shows a sustained reading (greater
24 than 15 seconds) of 200 ppmv Total Organic Compounds as methane or greater
25 downwind from the site at the property line (or other approved locations), the
26 excavation shall cease and the area generating the emissions shall immediately be
27 completely covered with a minimum of 6 inches of clean dirt, plastic sheet, or other
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1 South Coast AQMD approved cover. Excavation shall not resume until the readings
2 return to the pre-excavation level.

3 k. Excavated landfill material and refuse shall be immediately, not to exceed 1 hour,
4 relocated for burial onsite, immediately deposited into trucks/trailers for off-site
5 transport and completely covered with automated vinyl tarps, with such covers tied
6 down, except for during active loading/unloading of refuse.

7 l. When refuse loading is completed and during transport, no material shall extend
8 above the sides or rear of the truck or trailer which will haul the excavated material.
9 Excavated material shall be completely covered with automated vinyl tarps, with
10 the cover tied down.

11 m. Respondent shall ensure that there is no track-out from the excavation area.
12 Respondent shall ensure that all trucks used for excavation in Reaction Area go
13 through a rumble strip before exiting the excavation area, and Respondent shall
14 ensure that all trucks shall, following the conclusion of excavation, but not less than
15 once per day, be free of excavation materials. The rumble strip(s) shall be
16 adequately sized consistent with South Coast AQMD Rule 403 and maintained as
17 to prevent saturation/caking of soils that would cause the unit to become ineffective
18 in removing soil from tires.

19 n. Landfill materials and refuse which have been exposed to the atmosphere as a result
20 of the excavation, which have not been excavated and relocated for burial or
21 transported off site, shall be immediately, not to exceed 30 minutes, safety
22 permitting or unless otherwise approved in writing by South Coast AQMD, covered
23 (with a minimum of 6 inches of clean soil, secured plastic sheeting that is at least
24 10 mil, or other South Coast AQMD approved cover) whenever excavation is not
25 actively in progress, and at the end of each working day so that no portion of landfill
26 material and refuse is exposed to the atmosphere. Foam by itself shall not be used
27 as a night cover if it is raining or rain is predicted by the National Weather Service
28 prior to the next scheduled day of excavation. For the west slope excavation project,

1 Respondent shall follow the timing and cover procedures set forth in the west slope
2 excavation project work plan. If Respondent follows the work plan, it is otherwise
3 exempt from this Condition 42(n).

4 o. Daily inspections shall be conducted of any covered excavation area (per
5 Conditions 42(i), 42(j), and 42(n) above) to ensure the integrity of the cover(s) is
6 maintained and secured so that no portion of the soil is exposed to atmosphere. If
7 the cover material is not completely covering the landfill materials and refuse
8 generating emissions, or if the integrity of the cover has been compromised,
9 immediate corrective action shall be taken to add and secure a new cover, or
10 additional cover, on the area requiring corrective action. An inspection log shall be
11 maintained to record the time of the inspections and any corrective action
12 performed.

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

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

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

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

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

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

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- 1 s. Landfill excavation mitigation measures, other than those listed in this Condition
2 No. 42, which South Coast AQMD personnel determine are necessary to protect the
3 health and safety of the public, shall be implemented upon request.
- 4 t. During excavation, odor neutralizer and/or odor suppressant (e.g. clay binder
5 polymer spray-applied crusting cover material), shall be applied to the excavation
6 working face and excavated materials to minimize emissions and odor without
7 creating a safety hazard condition. Odor neutralizer applying equipment may
8 include but not be limited to, fans and arm tower misters.
- 9 u. During excavation in the Reaction Area as defined in Condition 9(a), Respondent
10 shall employ fresh, new (unused) bed liners in trucks for each load during loading
11 and transport. Respondent shall change out the existing bed liners in the trucks with
12 fresh, new bed liners for each subsequent load in each truck.
- 13 v. Respondent shall post a notice on the front page of its website
14 (chiquitacanyon.com), and notify in writing all addresses located within 5,280 feet
15 (1 mile) of the excavation area, at least 48 hours in advance of planned excavation
16 commencement with a short description of the proposed excavation work, the
17 estimated times of day excavation is proposed to occur, the estimated excavation
18 start date, and estimated excavation end date. For unplanned excavation, or
19 excavation where there is insufficient time to provide written notice at least 48 hours
20 in advance of commencement, and where such excavation is expected to last more
21 than one day, Respondent shall post a notice on the front page of its website as soon
22 as possible upon learning such excavation is necessary, not to exceed 2 business
23 hours. A copy of this notification shall be submitted to South Coast AQMD
24 [Attention: Baitong Chen, bchen@aqmd.gov; Nathaniel Dickel,
25 ndickel@aqmd.gov; Christina Ojeda, cojeda@aqmd.gov].
- 26 w. If a South Coast AQMD Rule 402 Nuisance Notice of Violation is received by the
27 Respondent during excavation, or a distinct odor (level 3 or greater per below Odor
28 Scale) resulting from the excavation is detected at or beyond the property line, then

1 the Respondent shall, in accordance with its Health and Safety Plan, conduct
2 ambient air quality sampling within 2 hours of receipt of Rule 402 Nuisance Notice
3 of Violation or of when a distinct odor (level 3 or greater) is detected at or beyond
4 the property line and analyze for TOC and speciated TOCs as follows:

5 Odor Scale Description of Odor Intensity

- 6 0 No odor detected
7 1 Very light odor detected
8 2 Light odor detected, distinguishable
9 3 Moderate odor, very distinguishable
10 4 Strong odor, very distinguishable, irritable
11 5 Very strong odor, very distinguishable, overpowering

12 i. Samples shall be collected at the following locations: immediately
13 upwind of the excavation site, immediately downwind of the
14 excavation site, within 3 inches of the exposed excavation
15 workface, safety permitting, and at the downwind property line, or
16 other location(s) approved in writing by South Coast AQMD. If
17 deemed unsafe, Respondent shall document the date and
18 conditions preventing compliance with this condition. Records of
19 such conditions shall be submitted in the following monthly report
20 pursuant to Condition 8.

21 ii. Sampling shall conform to CARB Method 422 or equivalent.
22 Samples with high moisture shall be collected using an appropriate
23 method such as South Coast AQMD Method 25.1/25.3 or other
24 methods approved in writing by South Coast AQMD.

25 iii. Samples shall be analyzed by EPA Method TO-3, and EPA
26 Method TO-15/TO-15A or other method approved in writing by
27 South Coast AQMD.
28

1 iv. All collected samples shall be sent to an appropriate laboratory for
2 analysis, within 24 hours of the sample collection, with expedited
3 analysis requested. All lab results shall be reported to South Coast
4 AQMD [Attention: Baitong Chen, bchen@aqmd.gov; Nathaniel
5 Dickel, ndickel@aqmd.gov; Christina Ojeda, cojeda@aqmd.gov;
6 Steve Dutz, sdutz@aqmd.gov] within 48 hours of receipt from the
7 laboratory.

8 x. During excavation, TOC and speciated TOC ambient air sampling shall be
9 conducted at least once between the hours of 6:00am and 11:00am, and at
10 least once between the hours of 2:00pm and 6:00pm, according to
11 Respondent's Health and Safety Plan and the following requirements:

12 i. Samples shall be collected at the following locations: immediately
13 upwind of the excavation site, immediately downwind of the
14 excavation site, within 3 inches of the exposed excavation
15 workface, safety permitting, and at the downwind property line, or
16 other location(s) approved in writing by South Coast AQMD. If
17 deemed unsafe, Respondent shall document the date and
18 conditions preventing compliance with this condition. Records of
19 such conditions shall be submitted in the following monthly report
20 pursuant to Condition 8.

21 ii. Sampling shall conform to CARB Method 422 or equivalent.
22 Samples with high moisture shall be collected using an appropriate
23 method such as South Coast AQMD Method 25.1/25.3 or other
24 methods approved in writing by South Coast AQMD.

25 iii. Samples shall be analyzed by EPA Method TO-3, and EPA
26 Method TO-15/TO-15A or other method approved in writing by
27 South Coast AQMD.

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1 iv. All collected samples shall be sent to an appropriate laboratory for
2 analysis, within 24 hours of the sample collection, with expedited
3 analysis requested. All lab results shall be reported to South Coast
4 AQMD [Attention: Baitong Chen, bchen@aqmd.gov; Nathaniel
5 Dickel, ndickel@aqmd.gov; Christina Ojeda, cojeda@aqmd.gov;
6 Steve Dutz, stdutz@aqmd.gov] within 48 hours of receipt from the
7 laboratory.

8 y. The excavation workface, which exposes refuse or other emission
9 generating material to the atmosphere, shall not exceed 1,000 square feet
10 (unless excavation is occurring pursuant to the west slope excavation
11 project work plan, in which case the working face shall be limited to 3,000
12 square feet), without prior written approval from the South Coast AQMD
13 or except where immediate, unplanned excavation is necessary to prevent
14 or remediate imminent impacts to public health and safety. Estimation of
15 the excavation workface size (square feet) shall be performed every hour
16 during excavation. The daily excavation start date and time, hourly
17 excavation workface size, and time of hourly excavation workface size
18 estimations shall be recorded, and shall be provided to South Coast
19 AQMD personnel within 48 hours of request.

20 z. If a South Coast AQMD Rule 402 Nuisance Notice of Violation is
21 received by Respondent during excavation, the approved mitigation
22 measures shall be implemented immediately. Approved mitigation
23 measures:

24 i. Excavation shall be limited to one location at a time.

25 ii. Unless excavation is occurring pursuant to the west slope
26 excavation project work plan, Respondent shall limit the
27 excavation workface, reducing the area by at least 50%, through
28 use of plastic sheeting that is free of tears and defects, 6 inches of

1 clean dirt cover, and/or long duration foam or other suppressant
2 approved in writing by South Coast AQMD. After two hours,
3 Respondent may return to the original size of the excavation
4 workface unless there are Unfavorable Wind Conditions, as
5 defined in the Stipulated Order for Abatement in Case No. 6177-
6 1.

7 iii. Minimizing soil disturbance/transfer.

8 iv. Limiting working hours, reducing the excavation working hours to
9 6 total hours for the day (or the number of working hours at the
10 time of receipt of the NOV, if greater than 6 hours).

11 v. Water and/or odor neutralizing products containing no VOC.

12 vi. Cleaning and covering of haul trucks.

13 vii. Good housekeeping.

14 aa. During excavation, if any ambient air monitoring stations at the fenceline
15 or in the surrounding community (MS-01 through MS-12) reach or exceed
16 applicable OEHHA acute REL concentrations (e.g. benzene acute REL is
17 8 ppb 1-hr average, H2S acute REL is 30 ppb 1-hour average), excavation
18 shall cease and approved mitigation measures per Condition No. 42(z)
19 above shall be implemented. Excavation shall not resume until
20 concentrations return and remain below the REL threshold(s) for the
21 duration of at least one averaging cycle for the respective acute RELs. The
22 approved mitigation measures shall be implemented when 25% or more of
23 the ambient monitoring stations are down for more than one averaging
24 cycle for the respective acute RELs at the same time or when there are no
25 operational realtime monitors downwind of the excavation workface,
26 which includes but is not limited to calibration, maintenance, breakdown
27 and repair.
28

1 bb. During excavation, other emission generating activities such as well
2 drilling in the reaction area, etc. shall be limited and prioritized outside of
3 excavation hours. If landfill gas collection and/or control equipment is
4 offline due to breakdown or maintenance, resulting in a reduction of gas
5 flow to control devices by 10% or more (compared to the gas flow prior
6 to the downtime of the first device), approved mitigation measures per
7 Condition 42(z) above shall be implemented until the landfill gas
8 collection and/or control equipment is returned to full operation.
9 Respondent shall keep and maintain a log of all non-operation (or
10 downtime) of landfill gas collection and control equipment, with dates,
11 times, duration, and reason for non-operation. This log shall be made
12 available to South Coast AQMD personnel within 24 hours of request.

13 **Other Conditions**

14 43. To ensure that fresh trash odors remain controlled, Respondent shall maintain the following
15 fresh trash-related odor mitigation measures recommended by its landfill operations expert
16 from the Stipulated Order for Abatement in Case No. 6177-1 during Unfavorable Wind
17 Conditions, as defined in the Stipulated Order for Abatement in Case No. 6177-1.
18 Respondent shall not expose more of the working face than is operationally necessary on
19 any working day and shall additionally maintain the following odor mitigation measures:

- 20 a. Use orchard fans, and tow-and-blow fans as needed, placed and spaced around the
21 working face in accordance with the recommendations of Chiquita's landfill
22 operations expert;
- 23 b. Use equipment equipped with odor neutralizer misting systems in various portions
24 of CCL to neutralize any fresh trash odors. This equipment shall include, but not be
25 limited to, fans and arm tower misters;
- 26 c. Identify and appropriately handle odorous loads at the scale and working face as
27 new waste loads enter CCL;
- 28 d. Haul odorous loads with proper sequencing and cover; and

- 1 e. Regularly train staff on all aspects of landfill operations, employee safety, and odor
2 control.
- 3 f. If Respondent detects trash-based odors at any stops during any odor surveillance
4 conducted pursuant to Condition No. 1(f) during Respondent's operating hours,
5 Respondent shall deploy additional permitted orchard-style fans to the working face
6 and surrounding area. If Respondent is not able to confirm the reduction of trash
7 based odors within 1 hour of deployment of additional fans, Respondent shall
8 reduce its working face by 25% of that day's total size for the remainder of the
9 operating day.
- 10 44. Respondent shall obtain, install, and maintain an on-site landfill meteorological station to
11 measure wind speed and direction by October 31, 2023. The meteorological station shall
12 be installed at a location appropriate for determining wind speed and direction on the top
13 deck of the landfill in the Reaction Area (as defined in Condition 9(a)) on a 1-hour average
14 basis, with measurements recorded every 5 minutes. The station shall record and preserve
15 all available readings for three years and the readings shall be made available to the South
16 Coast AQMD upon request.
- 17 45. Respondent shall install, maintain in good working order, and operate 1,000 feet or more
18 of Semi-Permanent Vapor Odor Control in the Reaction Area (as defined in Condition 9(a))
19 within 14 days of the approval of this Order. Respondent shall operate the Semi-Permanent
20 Vapor Odor Control system immediately and continuously.
- 21 46. Respondent shall operate and maintain in good working order a landfill perimeter odor
22 control misting system on permanent fencing on the west and northwest of the property.
- 23 47. The landfill perimeter odor control misting system shall be operated immediately and
24 continuously upon receiving data from the meteorological station, referenced in Condition
25 No. 44 above, that the 1-hour averaged wind direction is blowing in West, Northwest,
26 North, or Northeast directions (270 degrees to 45 degrees). The misting system shall
27 continue to operate until the 1-hour averaged wind direction data demonstrates the wind is
28 no longer blowing in the specified directions. The system shall be operated in such a

1 manner and with sufficient odor neutralizers to mitigate, to the extent possible, transient
2 odors from the landfill into surrounding communities, as determined by the Reaction
3 Committee.

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

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

26 a. If Respondent notifies South Coast AQMD per Condition No. 49 above
27 that the inconsistency with one or more Condition and an order of another
28 agency cannot be resolved, compliance with the applicable Condition(s)

1 of this Order shall be waived until further Order of the Hearing Board.
2 Notwithstanding the above, in no instance shall compliance with
3 Condition No. 49 or Condition No. 49(a) be waived.

4 50. Respondent shall follow the direction of EPA to implement the Master Work Plan
5 submitted to EPA under the Unilateral Administrative Order (UAO). Any monthly progress
6 reports submitted to EPA in accordance with the UAO shall also be submitted to the South
7 Coast AQMD (Baitong Chen, Air Quality Engineer, (bchen@aqmd.gov); Nathaniel Dickel,
8 Senior Air Quality Engineer, (ndickel@aqmd.gov), and Christina Ojeda, Air Quality
9 Inspector, (cojeda@aqmd.gov)).

10 51. Respondent shall permit South Coast AQMD personnel to conduct all inspections deemed
11 necessary by South Coast AQMD Compliance staff, including, but not limited to, collection
12 of samples. If during any inspection, South Coast AQMD observes uncontrolled liquid
13 which has at least one characteristic (including odor, appearance, etc.) that suggests the
14 liquid may be leachate, South Coast AQMD may require Respondent to collect a sample of
15 the liquid within 24 hours, submit the sample for expedited testing for VOCs, and submit
16 test results to the South Coast AQMD Compliance Inspector within 24 hours of receipt of
17 results, but no later than 96 hours after collection. Notwithstanding the preceding,
18 Respondent may require all visitors, including South Coast AQMD staff, to comply with
19 the site's Health and Safety Plan. Respondent shall not prohibit South Coast AQMD staff
20 from access to Respondent's facility, including the Reaction Area, if South Coast AQMD
21 staff comply with the Health and Safety Plan. Respondent shall provide South Coast
22 AQMD with any updates to the Health and Safety Plan within 1 business day of going into
23 effect.

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

1 release of liability in the form agreed upon by the parties on April 19,
2 2024.

3 52. Respondent shall reserve 60 minutes biweekly to host a virtual meeting between South
4 Coast AQMD technical staff and Respondent / Respondent's technical consultants to
5 discuss key updates on Respondent's implementation of this Order and any changes to
6 Landfill conditions or operations. Any instance of the biweekly meeting may be cancelled
7 at South Coast AQMD's sole discretion.

8 53. Respondent shall, on a monthly basis, report on the: (1) number of tanks in each leachate
9 tank group; (2) total number of leachate tanks treated; (3) monthly and year-to-date total
10 quantity of liquid collected; (4) monthly and year-to-date total quantity of liquid treated; and
11 (5) estimated monthly and year-to-date total quantity of seeping, pooling, or ponding
12 leachate collected. By no later than April 3, 2024, Respondent shall submit South Coast
13 AQMD (Baitong Chen, Air Quality Engineer, (bchen@aqmd.gov); Nathaniel Dickel, Senior
14 Air Quality Engineer, (ndickel@aqmd.gov), and Christina Ojeda, Air Quality Inspector,
15 (cojeda@aqmd.gov), the first report, and shall report this information in monthly reports
16 pursuant to Condition No. 8(q)(vi).

17 54. Respondent shall collect, convey, and store any condensate collected after the sulfur
18 treatment carbon absorbers separately from landfill leachate. No combining or mixing of
19 these liquid materials shall occur, to allow for accurate characterization and profiling of each
20 liquid.

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

- 26 a. The condensate has been sampled/analyzed and determined as non-
27 hazardous in accordance with hazardous material requirements by
28 respective agencies (U.S. EPA and DTSC), with sampling/analysis results

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provided to South Coast AQMD along with specified regulatory hazardous waste thresholds;

- b. The condensate tank has not received any additional liquid after the sampling/analysis performed in Condition 55(a) and will not receive any additional liquids prior to or during injection/combustion;
- c. Respondent has submitted a complete source test protocol which has been reviewed and approved by South Coast AQMD in writing, and which includes, at a minimum, procedures for testing of methane, total non-methane organic compounds, speciated organics (including but not limited to Rule 1150.1 Table 1 Carcinogenic and Toxic Air Contaminants), NOx as NO2, CO, particulate matter (PM10), oxygen and carbon dioxide, moisture content, temperature, flowrate, total sulfur compounds as H2S and speciated sulfur compounds, gas BTU value, nitrogen, methane and TNMOC destruction efficiency, and metals;
- d. Respondent has submitted a source test report which has been reviewed and approved in writing by South Coast AQMD;
- e. South Coast AQMD grants written approval to conduct condensate injection and has not withdrawn the approval based on follow-up source test evaluation(s);
- f. Respondent conducts follow-up flare source testing, at a minimum of every 6 calendar months, which includes non-hazardous condensate injection, and following the requirements of sub-item (d) above; and
- g. Respondent maintains records of condensate sampling/analysis results to demonstrate the liquid is non-hazardous, maintains records of daily condensate injection flows (gallons per day), and provides these records in the monthly report pursuant to Condition No. 8.

56. Respondent shall conduct sampling and analysis of vapors in the headspace of leachate tanks located in the Top Deck Tank Farm (Tank Farm #9). Sampling as required below shall be

1 completed no later than April 4, 2024. Samples shall be collected and analyzed from the
2 following equipment/locations:

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

12 Each of the sampled storage tanks shall be filled at least 2/3 full of leachate (approximately
13 14,000 gallons). Tanks to be sampled shall be preferentially selected to be those not
14 connected/vented to the landfill gas collection system and/or landfill gas control systems.
15 Vapor sampling and analysis of the headspace shall be conducted for total sulfur compounds
16 as H₂S and speciated sulfur compounds pursuant to South Coast AQMD Method 307-91,
17 and for speciated organic compounds pursuant to U.S. EPA Method TO-15. Sampling and
18 analysis shall be performed by a South Coast AQMD Laboratory Approval Program (LAP)
19 approved laboratory(ies), capable of sampling and analysis per South Coast AQMD Method
20 307-91 and U.S. EPA Method TO-15, respectively. A report detailing the sampling and
21 analysis parameters and complete laboratory analysis results shall be submitted to South
22 Coast AQMD by April 18, 2024 [Baitong Chen, Air Quality Engineer, (bchen@aqmd.gov);
23 Nathaniel Dickel, Senior Air Quality Engineer, (ndickel@aqmd.gov); Christina Ojeda, Air
24 Quality Inspector, (cojeda@aqmd.gov)]. The report shall include, at a minimum,
25 identification of the leachate tank(s) sampled, sample location within each leachate tank,
26 vapor/liquid connections, ventilation (if applicable) and configuration of the tank(s) which
27 were sampled, temperature of the leachate at time of sampling, date/time of sampling,
28 treatment status of the tank(s), volume of leachate within the tank(s), and complete

- 1 laboratory sampling and analysis results.
- 2 57. Respondent shall submit, by April 22, 2024, a complete permit modification application to
3 the Landfill Gas Condensate and Leachate Collection/Storage System (under Permit
4 G66132, A/N 613131) to increase the landfill's liquid storage capacity, including tanks and
5 equipment which have not been described in the applications submitted pursuant to
6 Condition 19. The submittal shall be accompanied with a complete Title V Revision
7 application and shall be submitted with an expedited permit processing request and
8 associated required fees, forms, and information.
- 9 58. Respondent shall submit, by June 21, 2024, a complete permit application for the operation
10 of the thermal oxidizer (pursuant to Condition 29) to include the thermal oxidizer under
11 Respondent's Title V permit. The submittal shall be accompanied with a complete Title V
12 Revision application and shall be submitted with an expedited permit processing request and
13 associated required fees, forms, and information.
- 14 59. Respondent shall submit, by June 21, 2024, a complete permit application for the Landfill
15 Gas Condensate and Leachate Treatment System, which includes treating hazardous liquid
16 waste. The submittal shall be accompanied with a complete Title V Revision application and
17 shall be submitted with an expedited permit processing request and associated required fees,
18 forms, and information.
- 19 60. Respondent shall submit, by April 22, 2024, a complete permit modification application to
20 the Landfill Gas Collection System (under Permit G43917, A/N 578102) to include the tie-
21 in of the landfill gas condensate and leachate treatment system vapor vent lines to the
22 Landfill Gas Collection System. The submittal shall be accompanied with a complete Title
23 V Revision application and shall be submitted with an expedited permit processing request
24 and associated required fees, forms, and information.
- 25 61. Respondent shall submit, by May 21, 2024, a complete permit modification application to
26 the Landfill Gas Flare System (under Permit G73696, A/N 645450) to include the
27 combustion of vapor vented from the hazardous liquid tanks in the landfill gas condensate
28 and leachate collection/storage tank system and landfill gas condensate and leachate

- 1 treatment system. The submittal shall be accompanied with a complete Title V Revision
2 application and shall be submitted with an expedited permit processing request and
3 associated required fees, forms, and information.
- 4 62. Respondent shall submit, by May 21, 2024, a complete permit modification application to
5 the Landfill Gas Flare System (under A/N 624296) to include the combustion of vapor
6 vented from the hazardous liquid tanks in the landfill gas condensate and leachate
7 collection/storage tank system and landfill gas condensate and leachate treatment system.
8 The submittal shall be accompanied with a complete Title V Revision application and shall
9 be submitted with an expedited permit processing request and associated required fees,
10 forms, and information.
- 11 63. By December 16, 2025, Respondent shall provide South Coast AQMD with a schematic of
12 the current leachate treatment system and leachate storage system, including but not limited
13 to connections, flow lines, treatment vessels, tanks, and tank groups, vent lines to control
14 equipment, lines to and between leachate tanks, tanks which are connected and not
15 connected to vacuum vent lines, and the leachate tanker truck loading/unloading equipment.
- 16 64. Respondent shall follow the direction of the EPA to prepare a Leachate Management Plan
17 in accordance with the Unilateral Administrative Order (UAO). Respondent shall submit the
18 final plan submitted to EPA to South Coast AQMD on or before March 28, 2024. Any
19 updates to the final plan shall be submitted to South Coast AQMD within 24 hours of
20 submittal to EPA.
- 21 65. Respondent shall provide notice to South Coast AQMD (Baitong Chen, Air Quality
22 Engineer, (bchen@aqmd.gov); Nathaniel Dickel, Senior Air Quality Engineer,
23 (ndickel@aqmd.gov); and Christina Ojeda, Air Quality Inspector, (cojeda@aqmd.gov) by
24 Friday of each week a summary of leachate dewatering pumps that have been installed and
25 resumed operation the prior week, and the number and location of dewatering pumps
26 anticipated to be installed and placed into operation in the following week , and the location
27 of all dewatering pumps installed and / or in operation.
- 28 66. Beginning September 2024, Respondent shall increase the frequency with which it monitors

1 for temperature and pressure at landfill gas collection wells within the Reaction Area to
2 twice monthly.

3 a. Respondent shall investigate a real-time, remote monitoring system which
4 shall, at minimum, monitor well pressure and landfill gas temperature at
5 the well head. The remote monitoring system may include monitoring of
6 fixed gases, oxygen, methane, and carbon dioxide, as well as wellfield
7 tuning/optimization and well liquid level monitoring. By April 19, 2024,
8 the Reaction Committee shall submit recommendations regarding
9 installation of the remote monitoring system. By no later than September
10 17, 2024, contracts to install and operate the monitoring system in
11 Condition No. 66(a)(v) shall be finalized.

12 i. Submit the finalized contract to install and operate the monitoring
13 that was due June 21, 2024 [per Order for Abatement Condition
14 No. 66 in effect April 24, 2024] to South Coast AQMD [Baitong
15 Chen, Air Quality Engineer, (bchen@aqmd.gov); Nathaniel
16 Dickel, Senior Air Quality Engineer, (ndickel@aqmd.gov), and
17 Christina Ojeda, Air Quality Inspector, (cojeda@aqmd.gov)] by no
18 later than September 17, 2024.

19 ii. Submit all known information of design, implementation,
20 installation, and specification issues/concerns by no later than
21 September 17, 2024. This shall include documented
22 correspondence and correspondence reports (for live
23 correspondence prior to August 17, 2024) summarizing results of
24 all communication with system, device, and component
25 vendors/manufacturers and/or contractors identifying the
26 following, including, but not limited to:

27 1. the system, device, and component viability and
28 availability, and

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2. the system, device, and component design, implementation, installation, and specification issues, such as compatibility, physical constraints, specifications falling short of operational need, and supply chain timelines.

iii. Respondent shall contact at least three reputable vendors/manufacturers/distributors for each of the systems, devices, and components that have identified issues/concerns as described by Condition No. 66(a)(ii) requesting and facilitating in obtaining proposed solutions and recommendations for each of the identified issues/concerns. Documented correspondence of the results of this communication shall be submitted to South Coast AQMD [Baitong Chen, Air Quality Engineer, (bchen@aqmd.gov); Nathaniel Dickel, Senior Air Quality Engineer, (ndickel@aqmd.gov), and Christina Ojeda, Air Quality Inspector, (cojeda@aqmd.gov)] by no later than, October 11, 2024.

iv. Respondent shall submit the findings and solutions to issues documented in Condition 66(a)(ii) and (iii), which shall include any additional communication from contacting various vendors, manufacturers, or distributors of systems, components, and devices by no later than October 30, 2024, or unless otherwise approved by South Coast AQMD, to [Baitong Chen, Air Quality Engineer, (bchen@aqmd.gov); Nathaniel Dickel, Senior Air Quality Engineer, (ndickel@aqmd.gov), and Christina Ojeda, Air Quality Inspector, (cojeda@aqmd.gov)].

1. The findings and solutions shall also include an inventory of the vertical wells in the Initial Reaction Area that contain a Lorenz pump capable of measuring liquid levels and down-well temperatures, including the location of the

1 vertical wells and the depth of the down-well temperature
2 probes. The findings and solutions shall also include an
3 inventory and installation timeline of the temperature
4 monitoring probe network approved by the U.S.
5 Environmental Protection Agency under the Unilateral
6 Administrative Order.

7 v. A remote monitoring system shall be installed and in operation no
8 later than December 31, 2024, or other date as approved in writing
9 by South Coast AQMD. Temperature shall be measured in at least
10 twenty (20) wellheads operated in the Initial Reaction Area
11 (defined as the boundary of Cells 1/2A, 2B/3, 4, and Module
12 2B/3/4 P2 as specified in Condition No. 9(a)). By October 15,
13 2024, the Reaction Committee shall determine the location for
14 installation of the remote monitoring system equipment and shall
15 submit its determination to South Coast AQMD [Baitong Chen,
16 Air Quality Engineer, (bchen@aqmd.gov); Nathaniel Dickel,
17 Senior Air Quality Engineer, (ndickel@aqmd.gov), and Christina
18 Ojeda, Air Quality Inspector, (cojeda@aqmd.gov)]. Should any of
19 the remote monitoring system equipment fail due to the ETLF
20 conditions at the Landfill, Respondent does not need to replace it.

21 vi. By January 31, 2025, the Reaction Committee shall submit a
22 proposal to assess the viability and functionality of a remote
23 monitoring system which measures temperature and pressure
24 within a well with a pump located within the Reaction Area,
25 including assessment of multiple depths within the well (e.g.
26 shallow, middle, and deep). The Proposal shall be submitted to
27 Baitong Chen [bchen@aqmd.gov]; Nathaniel Dickel
28 [ndickel@aqmd.gov]; Christina Ojeda [cojeda@aqmd.gov] for

1 review. Upon approval by South Coast AQMD, Respondent shall
2 conduct the feasibility assessment. The Reaction Committee shall
3 submit a final report to the South Coast AQMD (to Baitong Chen
4 [bchen@aqmd.gov]; Nathaniel Dickel [ndickel@aqmd.gov];
5 Christina Ojeda [cojeda@aqmd.gov]) detailing the results of the
6 feasibility study, and recommendations on further deployment of
7 the remote monitoring system not later than 150 days from the
8 approval of the feasibility proposal.

9 67. Respondent shall within 2 business days of the issuance of this Order designate an Inspection
10 Liaison responsible for coordinating the exchange of information between Respondent and
11 South Coast AQMD.

12 68. Respondent shall by June 15, 2024, install appropriately ranged differential pressure gauges,
13 with at least 0.01 inches water column resolution, or pressure gauge otherwise approved in
14 writing by South Coast AQMD, on each leachate storage tank. Respondent shall monitor
15 and record daily the differential pressure of each leachate tank, tank identification number,
16 date and time of the reading, and the personnel that conducted the reading. Pressure readings
17 that indicate the lowest value of the gauge or the highest value of the gauge, shall be reported
18 using significant digits to the hundredths place as “<= [lowest value on gauge] (e.g. <= -0.50
19 inches water column)” and “>= [highest value on gauge] (e.g. >= 0.50 inches water
20 column)”, respectively. The tanks shall be maintained under negative pressure, as
21 demonstrated by differential pressure readings. Zero and positive pressure readings do not
22 demonstrate negative pressure. Pressure gauges shall be calibrated according to
23 manufacturer specifications and schedule. Respondent shall report all the recordings in the
24 monthly report pursuant to Condition No. 8.

25 69. By July 19, 2024, Respondent shall conduct the first of ongoing quarterly inspection and
26 monitoring of HDPE, or other material, landfill gas conveyance piping, landfill gas
27 condensate and leachate conveyance piping, and any associated piping components such as
28 flanges, fittings, valves, connectors, pumps, or other equipment of the landfill gas collection

1 system and landfill gas condensate and leachate collection and storage system within the
2 enclosed piping networks. Monitoring Inspection shall include visual and/or physical
3 inspection of the specified equipment above, which is located aboveground, for buckling,
4 rupturing, cracking, melting, liquid leaks, or other structural concerns which may lead to the
5 release of fugitive landfill gas emissions, liquids, or odorous vapors. Monitoring shall
6 additionally include measurements of total organic compounds (TOC) as methane with a
7 flame ionization detector (FID), that conforms to Rule 1150.1 requirements, an organic
8 vapor analyzer for component leaks at each of the aboveground piping components within
9 the landfill gas collection system and landfill gas condensate and leachate collection and
10 storage system enclosed piping networks. A component will be considered to have a leak if
11 the concentration of methane measured one half an inch or less from a component source
12 exceeds 500 ppmv, other than non-repeatable, momentary readings. Records of this
13 monitoring activity shall include at a minimum:

- 14 a. A plot plan showing the piping networks monitored;
- 15 b. Date(s) when monitoring was performed;
- 16 c. Results of the visual/physical inspection and associated photos of any
17 piping or piping components which had any of the above-mentioned visual
18 and/or physical inspection concerns;
- 19 d. Results of piping component leak measurements;
- 20 e. Location(s) of component/equipment with visual and/or physical
21 inspection concerns and/or locations(s) where component leaks were
22 measured, which shall include the following:
 - 23 i. Location identified on a map;
 - 24 ii. Location identified by the landfill surface grid number and GPS
25 coordinates; and
- 26 f. Work which has been performed, or which is planned to be performed, and
27 associated date(s), to repair, replace, or conduct other actions to resolve
28 issues with the piping or components of concern.

1 Following four completed quarterly analyses, by July 31, 2025, the Reaction Committee
2 shall submit a recommendation to South Coast AQMD [attn: Baitong Chen,
3 bchen@aqmd.gov; Nathaniel Dickel, ndickel@aqmd.gov; Christina Ojeda,
4 cojeda@aqmd.gov] as to modifying the frequency of such.

5 70. Respondent shall, by June 28, 2024, submit a report on the landfill's current landfill gas
6 generation and projected landfill gas generation for the next five calendar years, through the
7 end of calendar year 2029. The current and projected landfill gas generation shall be
8 estimated through use of U.S. EPA's Landfill Gas Emissions Model (LandGEM), and the
9 Reaction Committee's analysis for additional landfill gas generated as a result of the ongoing
10 reaction. The report shall include, at a minimum, the following items:

- 11 a. LandGEM inputs, assumptions, and results;
- 12 b. Reaction Committee analysis and associated rationale and supporting data
13 or information; and
- 14 c. A comparison of the estimated landfill gas generation, both current and
15 projected, with the landfill's flaring capacity, both current and proposed,
16 assuming one or more flares or thermal oxidizers are offline due to
17 maintenance, overhaul, or other unforeseen circumstances.

18 Based on the report findings, if the landfill gas generation is expected to exceed the landfill's
19 flaring capacity when one or more flares or thermal oxidizers are offline, Respondent shall
20 start the planning and procurement process for the addition of an additional flare, thermal
21 oxidizer, or other landfill gas combustion/control equipment and ensure sufficient redundant
22 control capacity (meaning at least one additional control unit, equivalent in landfill gas
23 combustion capacity to the largest control unit on site, and whose operational capacity is not
24 required to combust the quantity of gas estimated in the LandGEM) to handle all generated
25 landfill gas, assuming any one or more unit(s) is offline.

- 26 a. Respondent shall submit, by October 31, 2024, a complete permit application
27 for the new construction of a Landfill Gas Flare (Flare No. 5), and modifications
28 of Flare 1 & 2 (G73696, A/N 645450), Flare 3 (A/N 624296), and Flare 4 (A/N

1 647996) to the extent necessary, to increase the landfill gas control capacity.
2 The submittals shall be accompanied with a complete Title V Revision
3 application and shall be submitted with an expedited permit processing request
4 and associated required fees, forms, and information.

5 71. Respondent shall submit, by May 21, 2024, a complete permit application for the installation
6 and operation of any aboveground surface landfill gas collection system, or underground
7 landfill gas collection system, installed for the purpose of collecting landfill gas under the
8 geosynthetic cover installed per Condition 31 or the cover as required by the Local
9 Enforcement Agency. The submittal shall be accompanied with a complete Title V Revision
10 application and shall be submitted with an expedited permit processing request and
11 associated required fees, forms, and information.

12 72. Respondent shall conduct sampling and analysis, testing, installation, and monitoring of the
13 leachate and landfill gas condensate collection and storage tank system, as specified below:

14 a. At least quarterly, conduct testing to sample and analyze the vapor flow in the piping
15 used to vent the leachate storage tanks and landfill gas condensate tanks and route the
16 vapors to the landfill gas control system. The testing shall at least include the
17 following items and the results of this testing shall be provided in the monthly report
18 pursuant to Condition No. 8.:

- 19 i. vented leachate tank vapor flowrate,
- 20 ii. vented condensate tank vapor flowrate,
- 21 iii. vapor temperature,
- 22 iv. concentrations of speciated organics (including but not limited to Rule 1150.1
23 Table 1 Carcinogenic and Toxic Air Contaminants),
- 24 v. the total sulfur compounds as H₂S and speciated sulfur compounds, and
- 25 vi. testing at each of the locations indicated below:

- 26 1. The tank vents or manifolds which are representative of a set of tanks;
- 27 2. The header/manifold from each leachate tank farm or manifold
28 including Tank Farm #7, Tank Farm #9, North Perimeter Manifold,

1 New East Perimeter Manifold, LC Manifold, landfill gas condensate
2 storage tanks, and any other future tank farms or manifolds, with
3 testing performed upstream of the piping connection to the LFG
4 Collection and Conveyance System where landfill gas may affect
5 results; and

6 3. The inlet of the flare(s) prior to combustion.

- 7 b. A source test protocol for this testing shall be submitted to South Coast AQMD by
8 May 17, 2024, unless otherwise approved in writing by South Coast AQMD. Testing
9 shall be conducted within 45 days of receiving written approval of the source test
10 protocol by South Coast AQMD, and the final results in a source test report format
11 shall be submitted within 30 days of testing, unless otherwise approved in writing by
12 South Coast AQMD.
- 13 c. Within 30 days of the initial source test report, Respondent shall submit a
14 recommendation from the Reaction Committee on additional vapor flow testing to the
15 South Coast AQMD [attn: Baitong Chen, bchen@aqmd.gov; Nathaniel Dickel,
16 ndickel@aqmd.gov; Christina Ojeda, cojeda@aqmd.gov]. The Reaction Committee
17 may submit further recommendations regarding additional vapor flow testing to the
18 South Coast AQMD within 30 days of additional source testing under this condition.
- 19 d. Beginning April 29, 2024, at least daily, conduct pressure testing and monitoring
20 within the HDPE header(s) venting the leachate storage tanks to quantify the vacuum
21 from the flare station blowers exerted on the leachate tanks, in inches of Water
22 Column (W.C.). Pressure testing and monitoring as specified in this condition is not
23 required upon complete installation of pressure gauges as specified in Condition 68.
- 24 i. Daily pressure readings, pressure testing location, indication of the tank farm
25 represented by the test results, and indication of each tank within the tank farm
26 represented by the test results shall be submitted in the monthly report per
27 Condition No. 8.
- 28 e. By June 28, 2024, unless otherwise approved in writing by South Coast AQMD,

1 install flow meters within the HDPE piping headers for associated leachate tank farms
2 to accurately measure and record the flow rate (scfm) and total daily volume of vented
3 leachate tank vapors being sent to the flare station for combustion. The flow meters
4 shall be installed according to manufacturer specifications and recommendations to
5 ensure accurate flow readings.

6 i. Daily flow rate (scf/day), flow meter location, indication of the tank farm
7 whose flow is being measured, and indication of each tank within the tank
8 farm vented and represented in the flow rate shall be submitted in the monthly
9 report per Condition No. 8.

10 73. Respondent shall prepare an inventory of all internal combustion engine equipment rated
11 greater than 50 HP onsite as of April 25, 2024 and shall submit this inventory to South Coast
12 AQMD by May 21, 2024. Respondent shall submit a permit application for internal
13 combustion engine equipment rated greater than 50 HP that is not already permitted through
14 South Coast AQMD by June 30, 2024, accompanied with a complete Title V Revision
15 application(s) and shall be submitted with an expedited permit processing request and
16 associated required fees, forms, and information. Going forward, Respondent shall submit a
17 permit application, accompanied with a complete Title V Revision application(s), for any
18 internal combustion engines greater than 50 HP brought on site that does not already have a
19 valid permit under Respondent's Title V Facility Permit or that does not already have a
20 complete application submitted to South Coast AQMD for the engine to be included in
21 Respondent's Title V Facility Permit.

22 74. Respondent shall expedite the procurement of the equipment needed to construct Flare No.
23 4 to the maximum extent feasible such that Flare No. 4 is ready to be constructed and put
24 into operation as soon as possible after Respondent receives all necessary permits or other
25 approvals. Respondent shall provide updates on the procurement of this equipment in the
26 monthly report pursuant to Condition 8(s).

27 75. Respondent shall expand the real-time, remote monitoring system installed in accordance
28 with Condition 66(a) and 66(a)(v) to include a minimum of 21 remote monitoring units

1 mounted on wellheads located around the outside perimeter of the data determined Reaction
2 boundary as specified in Condition 9(b), and a minimum of 5 remote monitoring units
3 mounted on landfill gas headers conveying gas from the Condition 9(b) Reaction boundary.

4 a. Respondent shall procure, install and begin operation of remote monitoring units by
5 October 31, 2025, unless otherwise approved in writing by South Coast AQMD.
6 Notice of completed installation and operational start shall be provided to South Coast
7 AQMD [Baitong Chen, Air Quality Engineer, (bchen@aqmd.gov); Nathaniel Dickel,
8 Senior Air Quality Engineer, (ndickel@aqmd.gov), and Christina Ojeda, Air Quality
9 Inspector, (cojeda@aqmd.gov)] by November 3, 2025.

10 b. The wellhead units shall include 19 permanent units, to be located on a particular
11 wellhead for at least 12 months, and shall include 2 mobile units which may be
12 relocated on site as necessary.

13 c. The 19 permanent units shall be installed on wells located in the immediate vicinity
14 surrounding the Condition 9(b) Reaction boundary, including the following wells:
15 CV-1906, CV-24120, CV-24126, CV-2455, CV-2454, CV-2305, CV-2476, CV-
16 24148, CV-24149, CV-2314, CV-2474, CV-24151, CV-2472, CV-2488, CV-2482,
17 CV-2480, CV-2466, CV-2344, and CV-2350, or as recommended by Respondent and
18 its vendor/distributor. Any changes to the above-mentioned well selection shall be
19 provided to South Coast AQMD in writing and shall include rationale and justification
20 for installing the unit(s) on any alternative wells.

21 d. The 5 header units shall be installed on primary header lines conveying gas from the
22 Condition 9(b) Reaction boundary and surrounding areas. The header unit locations
23 shall be for strategic monitoring of the gas collection system to allow for maximum
24 gas extraction, and to allow for quick actions to be taken to resolve issues noticed
25 upstream or downstream of the units. Two header units shall be installed on the
26 following header lines: 24-inch header piping running near CV-1426, 12-inch header
27 piping running near CV-24098, unless otherwise approved in writing by South Coast
28 AQMD.

- 1 e. All units shall be capable of monitoring temperature, pressure, and vacuum. The units
2 installed on wells without dewatering pumps shall also be capable of monitoring
3 liquid levels.
- 4 f. By August 29, 2025, the Reaction Committee shall submit a proposal to assess the
5 viability and functionality of adding gas flow rate and composition as monitoring
6 parameters to at least five (5) units installed on the wells listed in this condition. The
7 Proposal shall be submitted to Baitong Chen [bchen@aqmd.gov]; Nathaniel Dickel
8 [ndickel@aqmd.gov]; Christina Ojeda [cojeda@aqmd.gov]. Respondent shall
9 conduct the feasibility assessment. The Reaction Committee shall submit a final
10 report to the South Coast AQMD (to Baitong Chen [bchen@aqmd.gov]; Nathaniel
11 Dickel [ndickel@aqmd.gov]; Christina Ojeda [cojeda@aqmd.gov]) detailing the
12 results of the feasibility study, and recommendations on further deployment of the
13 remote monitoring system not later than 210 days from submittal of the feasibility
14 proposal with a minimum of 3 months of data collection.
- 15 g. Data collected by the monitor units shall be immediately recorded and uploaded as to
16 be available to review in the vendor/distributor's provided graphical user interface.
17 The graphical user interface shall include historical data, and shall be continuously
18 updated with newly gathered data. Additionally, the graphical user interface shall
19 allow for simple filtering and review of wellhead pressure, system pressure, landfill
20 gas temperature, landfill gas flowrates, and landfill gas composition measurements
21 and trends for each monitor unit. South Coast AQMD shall be granted read and
22 download access to this graphical user interface, to review historical and real-time
23 data.
- 24 h. Records documenting actions performed to resolve issues, and dates and times for
25 discovering and resolving issues as a result of the RMS shall be kept and maintained
26 daily on site, and shall be provided to South Coast AQMD upon request.
- 27 i. Records documenting the inspection and maintenance activities performed on the
28 monitoring units required by this condition shall be kept and maintained on site, and

1 shall be provided to South Coast AQMD upon request.

2 j. Records documenting any periods of Condition 75 RMS equipment downtime,
3 monitor units involved, the date and times of the downtime, reason(s) for the
4 downtime, and steps taken to resolve the downtime shall be kept and maintained on
5 site, and shall be provided to South Coast AQMD upon request.

6 76. Respondent shall install sample ports on all equipment on site that requires sampling, to
7 prevent unnecessary fugitive emissions from sampling activities. By December 2, 2024,
8 Respondent shall install sampling ports on all subject equipment and collect samples from
9 the sampling ports thereafter, unless otherwise approved in writing by South Coast AQMD.
10 For new equipment brought on site that requires sampling, sample ports shall be installed
11 within 30 days of bringing the equipment on site, or within 15 days of starting operation of
12 the equipment, whichever is sooner, unless otherwise approved in writing by South Coast
13 AQMD.

14 77. Respondent shall conduct aerial surveillance over the entire landfill surface on a monthly
15 basis, and over the Reaction Area defined in Condition 9(a) on a weekly basis, employing a
16 drone equipped with sensors with a minimum detection level of 1 ppmv methane, and in
17 accordance with OTM-51. If an aerial surveillance reading reaches or exceeds 200 ppmv
18 methane, Respondent shall conduct follow-up ground-based surface emission monitoring
19 field inspections according to the procedures of OTM-51 and U.S. EPA Method 21, unless
20 Respondent is unable to monitor the subject locations due to inaccessibility or dangerous
21 conditions for a technician. The follow-up field inspection shall be performed within 2 hours
22 of becoming aware of aerial surveillance exceedances. If an exceedance of 500 ppmv
23 methane is found or confirmed during the follow-up inspection, Respondent shall implement
24 corrective actions within 2 calendar days, including but not limited to, geosynthetic cover
25 maintenance or repair, landfill cover maintenance or repair, wellfield vacuum adjustments,
26 and piping/gas component maintenance or repair. Respondent shall develop 1) a color-
27 coordinated geospatial interpolated methane map displaying the absolute value results of the
28 methane readings, 2) a color-coordinated geospatial interpolated methane map displaying

1 the change in methane readings as compared to the prior aerial surveillance, 3) a map
2 displaying geolocated coordinates with local methane peaks and ground-based follow-up
3 peak verification, and 4) a map displaying the drone flight path. The local methane peak map
4 (map #3) shall include a color legend to differentiate locations displaying methane readings
5 of 1) < 200 ppmv, 2) ≥ 200 and < 500 ppmv, 3) ≥ 500 and < 1,000 ppmv, 4) $\geq 1,000$ and <
6 2,000 ppmv, 5) $\geq 2,000$ and < 5,000 ppmv, and 6) ≥ 5000 ppmv, or as otherwise approved
7 in writing by South Coast AQMD. The interpolated maps displaying the absolute value (map
8 #1) and change in methane readings (map #2) shall include a color legend to differentiate
9 the magnitude of the reading, as determined by Respondent, or as otherwise requested by
10 South Coast AQMD. The maps, follow-up field inspection measurements and locations with
11 associated dates/times, causes of exceedances (500 ppmv methane or greater), any corrective
12 actions performed, and documentation (date, time, reasoning) of field inspections not
13 performed due to inaccessibility or dangerous conditions shall be provided in the subsequent
14 monthly report pursuant to Condition 8(c). Raw data used to create any of the above
15 documents shall be provided to South Coast AQMD within 5 working days of request.

- 16 78. Respondent, or Respondent's contractor, as applicable, shall install a liner of 60 mil
17 polyethylene sheeting (or other equivalent flexible membrane cover) overlaying two feet of
18 compacted soil lining the bottom and 5 feet off the sides of the perimeter of each leachate
19 tanks and/or tank farms, except for driving lanes required for trucks to access leachate tanks
20 for leachate disposal or other routine operations or maintenance, to limit spills affecting the
21 ground, water, and potential for re-entrained air emissions. The sheeting/membrane liner
22 shall be inspected at least twice-daily, at the beginning and end of day, and shall be
23 maintained free of tears, rips, etc. The inspection and maintenance records shall be recorded
24 daily and shall contain, but not be limited to: (1) the date and time; (2) tank area designation
25 inspected; (3) the name of the person performing the inspection and written
26 acknowledgement that they did, or did not, take corrective action to maintain or replace the
27 liner; (4) specific notation as to the liner maintenance performed, including but not limited
28 to: liner repair or replacement, cleanup of spills on the liner, including volume of spill, etc.

1 Installation shall be completed as part of new installation of any tank or tank farm onsite
2 installed on or after April 16, 2025. For existing tank farms, installation shall be completed
3 not later than September 30, 2025.

4 79. Respondent shall submit any permit applications, source test protocols, source test reports,
5 and any other submittal requiring South Coast AQMD review and approval, with an
6 expedited processing/review requested, along with any associated fees, forms, and
7 information required.

8 80. Whenever South Coast AQMD permitted Various Location equipment or CARB Statewide
9 Portable Equipment Registration (PERP) permitted equipment is brought or operated on site,
10 the Respondent shall:

11 a. Notify South Coast AQMD in writing of the date and time that the equipment is
12 brought to the facility in the corresponding monthly report per Condition No. 8 and
13 include a copy of the various locations permit(s) and/or PERP permit(s) in the
14 corresponding monthly report per Condition No. 8.

15 b. Maintain a daily log including the following information for each permit unit: permit
16 number and/or registration number, application number (if applicable), equipment
17 location, and start and end time of equipment operation (as applicable). Respondent
18 shall submit the daily log in the in the corresponding monthly report per Condition
19 No. 8.

20 c. Notify South Coast AQMD in writing of the date and time that the equipment is
21 removed from the facility in the corresponding monthly report per Condition No. 8.

22 81. Respondent shall provide notification, by posting an alert on the front page of its website
23 (<https://chiquitacanyon.com>) for the purposes of notifying to the surrounding affected
24 community, whenever any landfill gas collection and control equipment (i.e. gas collection
25 wells/trenches, headers, flares, thermal oxidizer(s), blowers, etc.) has planned or unplanned
26 downtime anticipated to last 30 minutes or more, or once any downtime has a duration of 30
27 minutes or longer, according to the following:

28 a. Downtime of 30 Minutes or Longer:

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- i. Respondent shall provide the notification required by this Condition 81 for any individual control device that has downtime which is anticipated to last 30 minutes or more, or once any downtime for an individual control device reaches 30 minutes of downtime.
 - ii. If the downtime of any combination of landfill gas collection equipment results or is planned to result in a reduction of gas flow to control devices by 10% or more (compared to the gas flow prior to the downtime of the first device), Respondent shall provide the notification required by this Condition 81 for any such control devices that have downtime which is anticipated to last 30 minutes or more, or once any downtime for such devices reaches 30 minutes of downtime.
- b. This notification shall be posted online at least 48 hours prior to a planned downtime event, unless the event is planned less than 48 hours before the planned downtime. If there is less than 48 hours before the planned downtime, Respondent shall provide the notification as soon as possible, within 1-hour of finalizing plans for the downtime. For unplanned downtime, notification shall occur within 1-hour of reasonable discovery of any collection or control equipment issue resulting in unplanned downtime. The notification shall inform the public of the control equipment downtime, expected extent (in days/hours) of the downtime, and the possibility of increased odors in the community during the indicated period.
- c. Respondent shall, by November 18, 2024, develop a system allowing members of the public to sign-up for notifications of such outages or downtime via email or text message. Respondent shall develop the system such that any personally identifying information (including but not limited to name, phone number or email address) shall not be received nor retained directly by Respondent, any subsidiary or parent company of Respondent, or any direct employee of Respondent. Respondent shall deploy this system within three (3) business days of receiving notice to deploy from South Coast AQMD.

1 82. Respondent shall provide notification to South Coast AQMD [attn: Baitong Chen,
2 bchen@aqmd.gov; Nathaniel Dickel, ndickel@aqmd.gov; Christina Ojeda,
3 cojeda@aqmd.gov; Larry Israel, lisrael@aqmd.gov] whenever any landfill gas collection or
4 control equipment (i.e. gas collection wells/trenches, headers, flares, thermal oxidizer(s),
5 blowers, etc.) has scheduled and/or unplanned downtime. Downtime refers to cessation of
6 operation lasting 30 minutes or longer, according to the following:

7 a. Downtime of 30 Minutes or Longer:

8 i. Respondent shall provide the notification required by this Condition 82 for
9 any individual control device that has downtime which is anticipated to last
10 30 minutes or more, or once any downtime for an individual control device
11 reaches 30 minutes of downtime.

12 ii. If the downtime of any combination of landfill gas collection equipment
13 results or is planned to result in a reduction of gas flow to control devices by
14 10% or more (compared to the gas flow prior to the downtime of the first
15 device), Respondent shall provide the notification required by this Condition
16 82 for any such control devices that have downtime which is anticipated to
17 last 30 minutes or more, or once any downtime for such devices reaches 30
18 minutes of downtime.

19 b. This notification shall include an initial notification 24 hours prior to the planned
20 shutdown event, unless the event is planned less than 24 hours before the planned
21 downtime, Respondent shall provide the notification as soon as possible, within 1-
22 hour of finalizing plans for the downtime. For unplanned downtime, notification shall
23 occur within 1-hour of reasonable discovery of any control equipment issue resulting
24 in unplanned downtime. Respondent shall also provide a subsequent additional
25 notification and follow-up written report within 48 hours of startup and operation of
26 the equipment after the downtime event is corrected. The initial notification, and
27 subsequent notifications/follow-up report shall include the following items, unless
28 otherwise noted below:

- 1 i. Reason(s) for the downtime,
- 2 ii. Specification of whether the event was planned or unplanned event,
- 3 iii. Estimated (initial notification) and actual (subsequent notification/follow-up
- 4 report) start and end dates and times of the downtime event,
- 5 iv. Meteorological data (15-minute averaged), including wind direction(s) and
- 6 wind speed(s), starting from 48 hours prior to the downtime event, and
- 7 extending until 24 hours after associated equipment start-up and resumed
- 8 operation during the period of downtime (subsequent notification/follow-up
- 9 report only),
- 10 v. Facility-wide minute by minute landfill gas flow data, in Microsoft Excel
- 11 format, starting from 48 hours prior to the downtime event, and extending until
- 12 24 hours after associated equipment start-up and resumed operation
- 13 (subsequent notification/follow-up report only),
- 14 vi. A running log of all combustion equipment downtime events reported
- 15 pursuant to Condition 82, including the equipment name (e.g., Flares 1, 2, 3,
- 16 or Zeeco unit), planned or unplanned event, estimated (initial notification) and
- 17 actual (subsequent notification/follow-up report) start date and time of each
- 18 event, estimated (initial notification) and actual (subsequent
- 19 notification/follow-up report) end date and time of each event, estimated
- 20 (initial notification) and actual (subsequent notification/follow-up report)
- 21 duration of downtime in minutes, and reason(s) for downtime in an Excel
- 22 format. The information shall be clearly displayed for all downtime events and
- 23 combustion equipment in rows within one Excel sheet, allowing quick
- 24 determination of the downtime details for any equipment or combination of
- 25 equipment, including simultaneous downtime events.
- 26 c. The notifications specified in this condition are additional notifications and do not
- 27 replace Title V and/or breakdown notifications required by South Coast AQMD or
- 28 Federal Regulations, or by the Title V permit.

1 83. Respondent shall conduct a study and analysis of specific landfill operational events and
2 their potential emission impacts to the surrounding community, as determined from an
3 analysis of the air quality data recorded at monitoring stations MS-01 through MS-12. The
4 study shall consider various landfill operational events which may result in increased release
5 of emissions, including but not limited to, landfill excavations, downtime or decreased
6 operation of any landfill gas collection or control equipment resulting in a reduction of
7 landfill gas flow rate to an instantaneous value of a landfill-wide total of 11,000 scfm, or a
8 reduction of 10% or more of current operational flows, and leachate exposure to atmosphere
9 from spills/seeps/pressurized discharges. The 10% reduction in flow rate shall be determined
10 based on total landfill gas flow rate data trends by comparing the current total landfill gas
11 flow rate, averaged hourly, to the prior week's average landfill gas flow rate and the prior
12 day's average landfill gas flowrate. A 10% reduction in comparison to the weekly or daily
13 average value shall be analyzed as an operational event. The date, time, and duration of the
14 operational events shall be used, in conjunction with meteorological data and air monitoring
15 station data for all compounds monitored using continuous instrumentation, to the extent
16 such data is available, to determine the effects at downwind receptors. This study shall be
17 conducted for a period of 7 months, from June 1, 2024 through December 31, 2024, with a
18 report detailing the landfill operational events, meteorological data, air monitoring station
19 data, general findings of the study, and the landfill gas flow rate trend comparison used to
20 determine a 10% reduction. The report shall be submitted by March 31, 2025 to South Coast
21 AQMD [attn: Baitong Chen, bchen@aqmd.gov; Nathaniel Dickel, ndickel@aqmd.gov;
22 Christina Ojeda, cojeda@aqmd.gov]. The report shall also include a proposed scope for a
23 continuation of the study for up to an additional 6 months, subject to review and approval
24 by SCAQMD. The continuation of the study shall proceed upon written approval by the
25 South Coast AQMD.

26 a. Respondent shall conduct a continued study for a period of 10 months, from January
27 1, 2025 through October 31, 2025. The continued study shall exclude leachate vapors
28 from the landfill gas flow rate, and add to the list of events to be considered leachate

1 leaks and gas collection and leachate collection/storage system leak testing events.
2 Following the study, Respondent shall prepare a report detailing the landfill
3 operational events, meteorological data, air monitoring station data, general findings
4 of the study, and the landfill gas flow rate trend comparison used to determine a 10%
5 reduction. The analysis of potential air impacts shall consider at minimum the 15 most
6 significant events, in terms of emission potential and air impact potential, for each
7 individual operational event criteria, and shall detail and explain the selection of the
8 events as most significant. The analysis shall also compare and explain impacts at the
9 station or stations most likely to be impacted by the event, considering,
10 emission/event location, wind speed, wind direction, topographical impacts, and any
11 additional factors as needed. The report shall be submitted to South Coast AQMD
12 [attn: Baitong Chen, bchen@aqmd.gov; Nathaniel Dickel, ndickel@aqmd.gov;
13 Christina Ojeda, cojeda@aqmd.gov] by January 30, 2026.

14 84. Respondent shall evaluate the installation of windbreaks and/or wind flow disrupters along
15 the western and northern borders of the facility, and/or ridgeline, such that there are not any
16 distinguishable gaps in the border and/or ridgeline which may result in an odor channeling
17 affect into the Val Verde community, to enhance the dispersion of odors from the facility.
18 By no later than November 15, 2024, Respondent shall submit a report detailing the findings
19 of the evaluation to South Coast AQMD (attn: Baitong Chen, bchen@aqmd.gov; Nathaniel
20 Dickel, ndickel@aqmd.gov; Christina Ojeda, cojeda@aqmd.gov). The report detailing the
21 findings of the evaluation shall include the following:

- 22 a. The viability and advantages and disadvantages of the different windbreaks and/or
23 wind flow disruptors.
- 24 b. The estimated duration and timeline of the steps necessary to implement and install
25 each of the windbreaks and/or wind flow disruptors evaluated, including any
26 regulatory approvals and any associated environmental analysis and public
27 notification/outreach required, contractor procurement, contracts, bidding, contract
28 execution, equipment procurement, and equipment installation.

1 If installation of windbreaks and/or wind flow disruptors is deemed technically feasible and
2 viable, Respondent shall complete the installation of windbreaks and/or wind flow
3 disruptors. In the November 15, 2024 report, the Reaction Committee shall determine
4 technical feasibility and provide recommendations to the South Coast AQMD regarding
5 viability. Viability shall be determined by South Coast AQMD. If deemed technically
6 feasible and viable, installation shall take place within 180 days after receipt of written
7 approval by South Coast AQMD or 180 days after required regulatory approvals have been
8 procured, whichever is later.

9 85. Respondent shall comply with the following requirements in addition to the requirements
10 listed under Condition 42(a)-(bb) while conducting the west slope excavation project and
11 the toe drain termination project:

- 12 a. Landfill perimeter odor control misters shall be operated along the west slope
13 excavation area and toe drain termination project area while excavation is conducted
14 and while any waste, waste contaminated material, or odiferous material is exposed
15 to atmosphere.
- 16 b. By September 10, 2024 for the west slope excavation project, and by November 15,
17 2024 or upon commencement (whichever is later) of the toe drain termination project,
18 a Semi-Permanent Vapor Odor Control System shall be operated along the excavation
19 area while excavation is conducted and while any waste, waste contaminated material,
20 or odiferous material is exposed to atmosphere.
- 21 c. A weekly report shall be submitted to South Coast AQMD [Attention: Baitong Chen,
22 bchen@aqmd.gov; Nathaniel Dickel, ndickel@aqmd.gov; Christina Ojeda,
23 cojeda@aqmd.gov] each Tuesday by 8am PST reporting on the preceding week. The
24 weekly report shall report the west slope excavation activities and excavation
25 activities, if any, related to the toe drain termination project commenced, completed,
26 and yet to be completed with estimated timeline and amount (in cubic yards) of
27 soil/refuse to be excavated for completion. The report shall also identify any change
28 in daily excavation schedules, obstacles or unexpected corrective actions that

1 transpired. The first report for the west slope excavation project shall be due on
2 September 3, 2024. The first report for the toe drain termination project shall be due
3 on November 19, 2024, and shall also identify:

- 4 i. mitigation measures implemented per Condition No. 42(z), (aa) and/or
5 excavation cessation per Condition No. 42(aa) (as applicable);
- 6 ii. the corresponding reason for mitigation measures implemented per Condition
7 42(z) and/or (aa) and/or excavation cessation (as applicable);
- 8 iii. for excavation cessation and mitigation measures implemented per Condition
9 42(z) and/or (aa):
 - 10 1. the corresponding start and end times of such cessation and mitigation
11 measures (as applicable);
 - 12 2. the associated compound and compound concentration that reached or
13 exceeded the applicable acute REL (as applicable);
 - 14 3. date and time of reaching or exceeding the applicable acute REL that
15 resulted in implementation of mitigation measures and/or excavation
16 cessation (as applicable), and
 - 17 4. air monitor(s) which were down and associated wind direction data (as
18 applicable).

19 86. Respondent shall comply with the following requirements until the final approval of
20 liquid/condensate/leachate treatment and/or storage permits, for all liquid treatment and
21 storage equipment operating on site, unless otherwise approved in writing by South Coast
22 AQMD.

- 23 a. The equipment shall be properly maintained and kept in good operating condition at
24 all times in accordance with manufacturer's recommendations and industry best
25 management practices.
- 26 b. The equipment shall be operated and maintained by personnel properly trained in its
27 operation. Training certifications and/or detailed qualifications for these personnel
28 shall be maintained on site, and provided to South Coast AQMD personnel upon

1 request.

- 2 c. The operation of the equipment shall not result in the release of any raw landfill gas,
3 or discharge of odorous liquid vapors into the atmosphere, except for when collecting
4 samples from leachate treatment equipment. By November 1, 2024, Respondent shall
5 install sampling ports on all leachate tanks for which leachate sampling would occur
6 and would otherwise result in leachate exposure to open air during sampling, and
7 thereafter shall collect samples from such sampling ports. By November 1, 2024,
8 Respondent shall also prepare and submit to South Coast AQMD (Baitong Chen
9 [bchen@aqmd.gov]; Nathaniel Dickel [ndickel@aqmd.gov]; Christina Ojeda
10 [cojeda@aqmd.gov]) a schematic of the leachate treatment equipment, showing
11 where the sampling ports are located.
- 12 d. The liquid treatment system, leachate tanks, sludge/solids handling equipment and
13 tanks, and any other equipment associated with the treatment or storage processes
14 shall be fully enclosed, under vacuum, and vented to appropriate control (i.e. flare
15 station). This does not include the liquid treatment granular activated carbon
16 adsorbers, or liquid filtration equipment which operate under positive pressure.
17 Storage tanks with vapor headspace shall not be excluded from the requirements of
18 Condition No. 86(d).
- 19 e. Respondent shall inspect any liquid treatment system equipment under positive
20 pressure for vapor leaks at least once every week, as follows:
- 21 i. Leak inspections of liquid treatment connection points or joints shall be
22 conducted by monitoring for volatile organic compound emissions using a
23 calibrated photoionization detector (PID) and observing potential leak site(s)
24 to determine if any leaks are observed (e.g. concentrations of 100 ppmv or
25 greater are detected directly at the connection point or joint), or other
26 alternative method approved by South Coast AQMD.
 - 27 ii. All leaks shall be repaired within one calendar day of detection, unless
28 otherwise approved in writing by South Coast AQMD.

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iii. Respondent shall keep records of all vapor leak inspections in a log, recording, at a minimum, the date and time of the leak inspection, the name of personnel conducting the leak inspection, the inspection method, observations during the leak inspection (visual, audible, tactile, odor, etc.), any leaks detected, and the date, time, and manner by which leaks were subsequently repaired. Records shall be kept and maintained for a minimum of five (5) years and shall be made available to South Coast AQMD personnel upon request.

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 shall be used for the sole purpose of providing vacuum to the leachate treatment equipment.

g. Sample ports shall be installed at the locations of the five 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 any other equipment associated with the treatment or storage process and shall be monitored at least daily. Monitoring data shall include, but not be limited to, CH4%, CO concentration (ppmv), CO2%, and O2%, flowrates, and pressures.

87. Respondent is prohibited from conducting planned landfill gas combustion/control equipment downtime for three (3) or more landfill gas combustion/control units (Flares, Zeeco unit) at any one time, unless approved in writing by South Coast AQMD or where Respondent is conducting work under any of the following scenarios that requires the gas flow to be cut off from the flares:

- a. Installing a new flare under an approved authority to construct;
- b. Installing or replacing the blowers to the landfill gas flares;
- c. Performing installation or maintenance activities;
- d. Performing installation or maintenance activities that require Respondent to remove the piping coming into the flare station; or
- e. Performing installation or maintenance activities on the flares or flare station that

1 require the use of a crane.

2 88. Respondent shall install equipment and implement operational procedures to prevent
3 unplanned landfill gas combustion/control equipment downtime (Flares, Zeeco unit) to the
4 maximum extent feasible. The operator shall operate in accordance with the following
5 requirements:

6 a. Respondent shall expedite and complete the connection of permanent grid power to
7 the flare station by December 31, 2024, unless otherwise approved in writing by South
8 Coast AQMD.

9 b. Once the flare station is connected to permanent grid power, Respondent shall
10 maintain the existing flare station generators for the purpose of backup power at the
11 flare station. Respondent shall also install backup power at the Zeeco unit by
12 December 5, 2024. Once the flare station is connected to permanent grid power and
13 backup power connection safety disconnect is installed at the Zeeco thermal oxidizer,
14 Respondent shall minimize combustion/control equipment downtime as a result of
15 power failure. Unless there are documented inaccessibility or dangerous conditions
16 for the required technician, or South Coast AQMD approval, Respondent shall
17 complete the first start up cycle of the combustion/control equipment in the following
18 time frames:

19 i. If the Zeeco unit experiences downtime: 1.5 hours when the required
20 technician is onsite. If the required technician is not onsite, they will arrive at
21 the site as promptly as possible, safety permitting, but not to exceed 2 hours.

22 ii. If the flares at the flare station experience downtime: the flare(s) associated
23 with the first generator shall complete their initial start up cycle within the
24 time frames listed above, and the flare(s) associated with the second generator
25 may take up to an additional hour to complete their initial start up cycle.

26 In the event that the first complete start up cycle is unsuccessful, Respondent shall
27 successfully restart the combustion/control equipment within 30 additional minutes.

28 In the event Respondent is unable to complete the necessary work to correct the power

1 failure and restart the combustion/control equipment within the timeframes listed
2 above due to inaccessibility or dangerous conditions for the technician, Respondent
3 shall document the conditions that do not allow for the work to be completed within
4 the required timeframe.

5 Permit applications for the engine(s) providing power and/or backup power shall be
6 submitted in accordance with Condition Nos. 73 and 79.

7 89. For any equipment for which Respondent has submitted a permit application to South Coast
8 AQMD that is not covered under Condition No. 86, and for any equipment for which
9 Respondent is required to submit a permit application to South Coast AQMD, Respondent
10 shall comply with the following requirements until the final approval of such permit
11 application, unless otherwise approved in writing by South Coast AQMD.

12 a. The equipment and associated ancillary parts shall be properly maintained and kept
13 in good operating condition at all times, which includes, where applicable, following
14 the manufacturer's recommendations and industry best management practices.

15 b. The equipment shall be operated and maintained by personnel properly trained in its
16 operation.

17 90. Within 30 days, or earlier, of the Department of Toxic Substances Control's (DTSC) final
18 approval of the written workplan for the permanent relocated tank farm, Respondent shall
19 submit to South Coast AQMD a complete permit modification application to the Landfill
20 Gas Condensate and Leachate Collection/Storage System (under Permit G66132, A/N
21 613131). The application shall include the revised tank location(s), revised number of
22 tanks/storage capacity, and the updated site-wide configuration of the system. The submittal
23 shall be accompanied with a complete Title V Revision application and shall be submitted
24 with an expedited permit processing request and associated required fees, forms, and
25 information.

26 91. Within 30 days, or earlier, of DTSC's final approval of the written workplan for the
27 permanent relocated tank farm, Respondent shall submit to South Coast AQMD a complete
28 permit application for each hazardous and non-hazardous liquid treatment system. The

1 submittal shall be accompanied with a complete Title V Revision application and shall be
2 submitted with an expedited permit processing request with associated required fees, forms,
3 and shall include, but not limited to, the applicable information listed in South Coast AQMD
4 Reg. II and below:

- 5 a. Separate permit applications for each treatment system.
 - 6 b. Process flow diagram for each treatment system illustrating the pathway(s) the liquid
7 is conveyed throughout the system and identifying which tanks the liquid is
8 transferred to and from, including identification of all potential emission release
9 points, the connections to the leachate storage tanks, safety components and the
10 associated specifications, if applicable), monitoring components (if applicable), and
11 identify which components are under vacuum or positive pressure.
 - 12 c. Specify the capacity, dimensions, and number of tanks and vessels in each system.
13 Identify, for each component (e.g. tanks and/or vessels) in each system, whether they
14 have headspaces.
 - 15 d. Standard operating procedures for each system to safeguard from overflow of leachate
16 and ensure minimal fugitive emission release points.
 - 17 e. Leachate flow rates, material usage rates, and process parameters affecting air
18 pollution emissions or needed to determine potential emissions of air pollutants.
- 19 92. Respondent shall send any file(s) with a cumulative size larger than 35 MB via a shared link,
20 by email, which allows South Coast AQMD personnel to be able to download the file(s).
- 21 93. Respondent shall ensure hydrostatic liquid level transmitters are installed in all leachate
22 storage tanks capable of having such transmitters installed in them to measure the level of
23 liquids within the tanks by June 30, 2025, and shall ensure such transmitters are installed as
24 part of installation of any new tanks capable of having such transmitters installed in them.
25 The transmitters shall be capable of uploading the liquid level readings to the cloud such
26 that the readings are accessible within 2 hours. The tank level information shall be
27 monitored by Respondent's personnel and communicated to necessary personnel involved
28 before and during tank filling operations.

- 1 94. Respondent shall submit, by May 30, 2025, a complete permit application for the additional
2 landfill gas combustion/control unit brought on-site in February 2025. The submittal shall
3 be accompanied with a complete Title V Revision application and shall be submitted with
4 an expedited permit processing request and associated required fees, forms, and
5 information.
- 6 95. Respondent shall submit, by April 30, 2025, a complete permit modification application for
7 the Landfill Gas Condensate and Leachate Collection/Storage System (under Permit
8 G66132, A/N 613131) to increase the landfill's liquid storage capacity and include the new
9 temporary tank farm located in Canyon D as part of the facility's leachate collection/storage
10 system. The submittal shall be accompanied with a complete Title V Revision application
11 and shall be submitted with an expedited permit processing request and associated required
12 fees, forms, and information.
- 13 96. By April 30, 2025, update the prior estimates of current and projected landfill gas generation
14 prepared pursuant to Condition No. 70 based on the Landfill ceasing to accept external waste
15 for disposal as of December 31, 2024, including any internal degradable waste disposed of
16 since that date, and submit an updated report on the landfill's current and projected landfill
17 gas generation through the end of calendar year 2029. Landfill gas generation shall be
18 estimated through use of U.S. EPA's LandGEM, and the Reaction Committee's analysis for
19 additional landfill gas generated as a result of the ongoing reaction. The report shall include
20 the items listed in Condition No. 70(a)-(c).
- 21 97. Respondent shall visually inspect all connection points, seams, and seals of the geosynthetic
22 cover(s) in and around the Reaction Area (as defined in Condition No. 9(a)) at least once
23 every seven (7) calendar days, and shall promptly repair any cover issues identified,
24 Respondent shall maintain a log demonstrating that it has completed each inspection and
25 addressed any issues with any connection points, seams, or seals of the geosynthetic cover,
26 including the date the issue was identified, the action taken to repair the damage, and the
27 time at which the repair was completed. Results of the inspection and the repair log required
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1 by this condition shall be included in the monthly reports required pursuant to Condition
2 No. 8.

3 98. Respondent shall, not later than October 30, 2026 unless otherwise approved in writing by
4 South Coast AQMD, install a passive liquid and vapor collection receptacle onto all air
5 release valves installed on the leachate/condensate collection and conveyance piping and
6 any other valves installed on the subject piping where liquids or vapors may be
7 exposed/released to atmosphere, excluding any emergency pressure/vacuum relief valves.

8 a. Such receptacles shall be designed and installed to ensure that they are maintained in
9 an airtight condition. All vapors from the receptacles shall be vented and conveyed to
10 the landfill gas collection system. All collected liquids shall be conveyed to the
11 leachate/condensate collection system. The liquids from the receptacle shall not be
12 routed to the landfill gas collection system.

13 b. Respondent shall prioritize liquid and vapor collection receptacles installation on air
14 release valves on liquid collection/conveyance lines which move characteristically
15 hazardous liquids.

16 c. Any air release valve that does not have a fully installed and operational liquid and
17 vapor collection receptacle per Condition 98(a) above shall not be opened for any
18 reason unless otherwise approved in writing by South Coast AQMD.

19 d. Respondent shall inspect the valves, and associated liquid and vapor collection
20 receptacles at least once every 14 days. Inspections shall include observations (visual,
21 audible, tactile, odor, etc.) to determine any liquid or vapor leaks. Inspections shall
22 also include monitoring of connection points or joints using a PID as specified in
23 Condition 86(e)(i). All leaks detected shall be repaired consistent with the schedule
24 listed in Condition 86(e)(ii). Respondent shall maintain records for these inspections,
25 consistent with the requirements listed in Condition 86(e)(iii).

26 99. By December 21, 2025, all liquid/leachate transfers from stationary leachate storage tanks
27 into leachate tanker trucks, or from leachate tanker trucks into stationary leachate storage
28 tanks, shall be performed via bottom loading of leachate into the leachate tanker truck or

1 stationary storage tank to the maximum extent feasible. By March 16, 2026, not less than
2 50% of all liquid/leachate transfers from stationary leachate storage tanks into leachate
3 tanker trucks, or from leachate tanker trucks into stationary leachate storage tanks, shall be
4 performed via bottom loading.

- 5 100. By January 16, 2026, Respondent shall submit a feasibility assessment proposal to assess
6 the viability and functionality of a leachate vapor recovery and control system to recover
7 leachate vapors during loading of liquid/leachate into the leachate tanker trucks and control
8 the recovered vapors either in Respondent's existing landfill gas control system or in a new
9 or modified system. The proposal shall be submitted to the South Coast AQMD [attn:
10 Baitong Chen, bchen@aqmd.gov; Nathaniel Dickel, ndickel@aqmd.gov; Christina Ojeda,
11 cojeda@aqmd.gov] for review and approval. Respondent shall incorporate South Coast
12 AQMD comment(s) on the proposal and shall submit a revised proposal, or shall provide
13 detailed justification for not incorporating the comment(s), within 15 days of receipt of South
14 Coast AQMD comment(s) unless otherwise approved in writing by South Coast AQMD.
15 Upon approval by South Coast AQMD, Respondent shall conduct the feasibility assessment.
16 Respondent shall submit a final report to South Coast AQMD within 150 days of the
17 approval of the feasibility assessment proposal [attn: Baitong Chen, bchen@aqmd.gov;
18 Nathaniel Dickel, ndickel@aqmd.gov; Christina Ojeda, cojeda@aqmd.gov] detailing the
19 results of the feasibility assessment, including at a minimum, all equipment considered (tank
20 trucks with standard vapor balance capabilities, vapor collection equipment, existing and/or
21 new designed adapters for tank truck vapor connections, vapor recovery/collection
22 equipment, vapor recovery/control configurations, etc.), companies contacted as part of the
23 assessment and associated written communication logs, and any further details collected or
24 considerations made relating to feasibility of a leachate vapor collection and control system.
25 If during the feasibility assessment, Respondent determines that such a system is feasible,
26 the submitted report shall include a workplan for the installation and operation of the
27 leachate vapor recovery and control equipment and related installations. The workplan shall
28 include a timeline for permit application submittals, and procurement of the leachate vapor

- 1 recovery and control equipment and for the commencement of leachate vapor recovery and
2 control.
- 3 101. For the purpose of this Order for Abatement, construction spoils are landfill trash, material
4 that is mixed with or in contact with landfill trash, or odorous material that is removed from
5 well holes or trenches, there shall be no stockpiling of construction spoils on the landfill
6 surface at any time, except for temporary staging for purposes of appropriate disposal. All
7 construction spoils shall be deposited at an appropriate disposal site within one hour of
8 generation or as deemed necessary by South Coast AQMD. Deposited means, they shall be
9 covered with a minimum of 6 inches of clean dirt, approved foam, or heavy-duty plastic
10 sheeting. Foam by itself shall not be used as a cover if it is raining or if rain is predicted by
11 National Weather Service prior to the next scheduled working day.
- 12 102. Respondent shall submit, by December 31, 2025, a complete permit modification application
13 for the Landfill Gas Condensate and Leachate Collection/Storage System (under Permit
14 G66132, A/N 613131) for the removal of tank farm #9, and relocation, construction, and
15 operation of tanks in tank farm #13 as part of the facility's leachate collection/storage
16 system. The submittal shall be accompanied with a complete Title V Revision application
17 and shall be submitted in accordance with Condition No. 79.
- 18 103. Respondent shall submit, by December 31, 2025, a complete permit application for the
19 hazardous and/or non-hazardous liquid treatment system constructed and operating in tank
20 farm #13. The submittal shall be accompanied with a complete Title V Revision application
21 and shall be submitted in accordance with Condition No. 79.
- 22 104. Respondent shall return for a status and modification hearing on May 28, 2026, or as soon
23 thereafter as the Hearing Board can schedule a hearing.
- 24 105. The Hearing Board may modify this Order for Abatement without the stipulation of the
25 parties upon a showing of good cause therefore, and upon making the findings required by
26 Health and Safety Code Section 42451(a) and District Rule 806(a). Any modification of the
27 Order shall be made only at a public hearing held upon 10 days published notice and
28 appropriate written notice to the Respondent.

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106. The Hearing Board shall retain jurisdiction over this matter until October 31, 2026 and at that time this Order shall no longer be of any force or effect, unless this Order is amended, modified, or dissolved before then.

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

BOARD MEMBER: *Mohan Balagopalan*
Mohan Balagopalan

DATED: 2/12/26