

Proposed Modifications for November 13-14, 2024 Hearing (Case No. 6177-4)

Condition	Stipulated
9(b)	The Reaction Committee shall review applicable data and shall consider revision to the Reaction Area as frequently as appropriate but shall make a determination about whether to revise the Reaction Area map at least once per month, with . <u>The determination, supporting evidence and assumptions and explanation for the determination and revised Reaction Area map (if applicable), isothermal gradient range map consisting of wellhead and temperature probe readings measurements (once data is available) in an Excel format, wellhead carbon monoxide range map, and vertical temperature profiles for temperature probes shall be</u> submitted to the South Coast AQMD [attn: Baitong Chen, bchen@aqmd.gov; Nathaniel Dickel, ndickel@aqmd.gov; Christina Ojeda, cojeda@aqmd.gov] no later <u>than 107</u> days following the end of the month.
12(i)	Respondent has conducted an initial flux chamber study pursuant to the direction of the Los Angeles County Department of Public Health. Respondent shall conduct landfill gas flux studies for, <u>at a minimum</u> , methane, non-methane organic compounds (“NMOC”), <u>speciated hydrocarbons (C2-C12)</u> , toxic air contaminants (TAC) <u>analyzed by EPA Method TO-15 (including acrolein and additionally at least the ten highest concentration tentatively identified compounds)</u> , total reduced sulfur (“TRS”), and speciated sulfur compounds to determine the surface flux throughout the landfill starting with Quarter Four 2024 and once every four months thereafter. The studies shall be conducted through the use of dynamic flux chambers oriented...
New 27(g)	Respondent shall not overfill leachate collection/storage tanks or liquid treatment tanks.
29	Respondent shall ensure it has proper <u>landfill leachate and landfill gas condensate storage capacity and contracted disposal</u> capacity (based on <u>liquid production and collection</u> reporting pursuant to Condition 8 and additionally assuming full landfill liquid pumping operation) to accumulate onsite and/or dispose of collected liquids/leachate at an appropriate facility or facilities. <u>Respondent shall comply with the Leachate Management Plan approved by the EPA and submitted to the South Coast AQMD pursuant to Condition No. 64, which includes contingency measures such as whether it is appropriate to reduce pumping operations in case of an emergency.</u>
34(a)	Within 30 days of this issuance of this Modified Order, Respondent shall ensure that <u>the weekly 24-hour time-integrated canister weekly samples for benzene, and live, real-time continuous H2S and methane, and all hourly microGC DMS and VOC</u> concentration data from <u>all monitors current and/or 24-hour samples within the Val Verde future fence line and surrounding community monitoring sites</u> are posted to and accessible at the webpage created pursuant to Condition 39 for public access, displayed in an easy to read graphical format plot with compound concentration (y-axis) in parts per billion volume (ppbV) vs. time (x-axis) in DD/MM/YYYY HH:MM format, which is simple to review and understand. The compounds concentration data displayed in the graphical plot in ppbV shall be plotted based on the finalized data as reported by the testing laboratory or monitoring device ensuring all significant figures are preserved and without rounding. The display shall allow the public to determine the <u>24-hour time-integrated canister samples for benzene and real-time, continuous H2S and methane concentration, and hourly microGC DMS and VOC concentrations</u> , and the geographic location where the concentration is monitored. The graphical format plot shall additionally reference and display a horizontal dotted or dashed line for each compound’s respective Reference Exposure Level (REL) (as applicable) established by California Office of Environmental Health Hazard Assessment (OEHHA): (1) the acute 1-hour OEHHA REL for H2S, which is the same as the

	<p>state-level standard for this compound (30 ppb), and (2) the acute 1-hour OEHHA REL for benzene (8 ppb). An intuitive mechanism (e.g., a link) to download historical data (for each data source) in a compiled, usable format (such as .csv) should be provided and made publicly accessible on the webpage created pursuant to condition 39 – including full analytical results of the 24-hour time-integrated canister samples, continuous monitoring data for H2S and methane (including meteorological data), and the hourly DMS and VOC results for all microGC instruments.</p>
36	<p>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 power are implemented and any necessary permits and approvals by regulatory agencies for permanent power are obtained, these instruments will be installed and put into operation using temporary power to allow for continuous measurements of all volatile organic compounds required. It is recognized that the use of temporary power may not guarantee the uninterrupted operation of these instruments. Respondent shall develop a monitoring plan that utilizes reliable and field-proven instrumentation, such as a micro gas chromatograph (MicroGC) with pre-concentration, and seek approval from South Coast AQMD. Respondent shall request and pay for expedited processing of all permits and procurement of the instruments, if available. To ensure Respondent is on schedule to complete installation within the 75 days, Respondent shall provide the South Coast AQMD (attn: Kathryn Roberts, kroberts@aqmd.gov; Mary Reichert, mreichert@aqmd.gov) an update at intervals of 30 days and 60 days from the issuance of the Order. Respondent shall specifically address whether it believes an extension is necessary and provide supporting documentation if it is seeking such extension. The AQMD may grant an extension of up to 60 days as appropriate based on the evidence submitted.</p> <p>(c) By the time of the status hearing contemplated in Condition No. 93, or unless otherwise approved in writing by South Coast AQMD, the MicroGCs installed pursuant to Condition No. 36 shall also be capable of measuring hourly concentrations of acrolein. The South Coast AQMD has requested EPA concurrence on the addition of acrolein; if EPA does not concur, the parties will address this provision at the status hearing contemplated in Condition No. 93.</p>
82(b)	<p>This notification shall include an initial notification 24 hours prior to the planned shutdown event, unless the event is planned less than 24 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 control equipment issue resulting in unplanned downtime. Respondent shall also provide a subsequent additional notification and follow-up written report within 48 hours of startup and operation of the equipment after the downtime event is corrected. The initial notification, and subsequent notifications/follow-up report shall include the following items, unless otherwise noted below:</p> <ol style="list-style-type: none"> i. Reason(s) for the downtime, ii. Specification of whether the event was planned or unplanned event, iii. Estimated (initial notification) and actual (subsequent notification/follow-up report) start and end dates and times of the downtime event, iv. Meteorological data (15-minute averaged), including wind direction(s) and wind speed(s), starting from 48 hours prior to the downtime event, and extending until 24 hours after associated equipment start-up and resumed operation during the period of downtime (subsequent notification/follow-up report only), v. Facility-wide minute by minute landfill gas flow data, in Microsoft Excel format, starting from 48 hours prior to the downtime event, and extending until 24 hours after associated equipment start-up and resumed operation (subsequent notification/follow-up report only),

	<p><u>vi. A running log of all combustion equipment downtime events reported pursuant to Condition 82, including the equipment name (e.g., Flares 1, 2, 3, or Zeeco unit), planned or unplanned event, estimated (initial notification) and actual (subsequent notification/follow-up report) start date and time of each event, estimated (initial notification) and actual (subsequent notification/follow-up report) end date and time of each event, estimated (initial notification) and actual (subsequent notification/follow-up report) duration of downtime in minutes, and reason(s) for downtime in an Excel format. The information shall be clearly displayed for all downtime events and combustion equipment in rows within one Excel sheet, allowing quick determination of the downtime details for any equipment or combination of equipment, including simultaneous downtime events.</u></p>
85	<p>Respondent shall comply with the following requirements in addition to the requirements listed under Condition 42(a)-(bb) while conducting the west slope excavation project <u>and the toe drain termination project</u>:</p> <p>a. Landfill perimeter odor control misters shall be operated along the west <u>slope excavation area and toe drain termination project</u> area while excavation is conducted and while any waste, waste contaminated material, or odiferous material is exposed to atmosphere.</p> <p>b. By September 10, 2024 <u>for the west slope excavation project, and by November 15, 2024 or upon commencement (whichever is later) of the toe drain termination project</u>, a Semi-Permanent Vapor Odor Control System shall be operated along the excavation area while excavation is conducted and while any waste, waste contaminated material, or odiferous material is exposed to atmosphere.</p> <p>c. A weekly report shall be submitted to South Coast AQMD [Attention: Baitong Chen, bchen@aqmd.gov; Nathaniel Dickel, ndickel@aqmd.gov; Christina Ojeda, cojeda@aqmd.gov] each Tuesday by 8am PST reporting on the preceding week. The weekly report shall report the west slope excavation <u>activities and excavation activities, if any, related to the toe drain termination project activities</u>-commenced, completed, and yet to be completed with estimated timeline and amount (in cubic yards) of soil/refuse to be excavated for completion. The report shall also identify any change in daily excavation schedules, obstacles or unexpected corrective actions that transpired. The first report <u>for the west slope excavation project</u> shall be due on September 3, 2024. <u>The first report for the toe drain termination project shall be due on November 19, 2024, and shall also identify:</u></p> <ul style="list-style-type: none"> <u>(i) mitigation measures implemented per Condition No. 42(z), (aa) and/or excavation cessation per Condition No. 42(aa) (as applicable);</u> <u>(ii) the corresponding reason for mitigation measures implemented per Condition 42(z) and/or (aa) and/or excavation cessation (as applicable);;</u> <u>(iii) for excavation cessation and mitigation measures implemented per Condition 42(z) and/or (aa):</u> <ul style="list-style-type: none"> <u>(1) the corresponding start and end times of such cessation and mitigation measures (as applicable);;</u> <u>(2) the associated compound and compound concentration that reached or exceeded the applicable acute REL (as applicable)</u> <u>(1)(3) and date and time of reaching or exceeding the applicable acute REL that resulted in implementation of mitigation measures and/or excavation cessation (as applicable), and</u> <u>(2)(4) air monitor(s) which were down and associated wind direction data (as applicable).</u>

NEW 87	<p>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:</p> <ol style="list-style-type: none"> 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 require the use of a crane.
NEW 88	<p>Respondent shall install equipment and implement operational procedures to prevent unplanned landfill gas combustion/control equipment downtime (Flares, Zeeco unit) to the maximum extent feasible. The operator shall operate in accordance with the following requirements:</p> <ol style="list-style-type: none"> a. Respondent shall expedite and complete the connection of permanent grid power to the flare station by December 31, 2024, unless otherwise approved in writing by South Coast AQMD. b. Once the flare station is connected to permanent grid power, Respondent shall maintain the existing flare station generators for the purpose of backup power at the flare station. Respondent shall also install backup power at the Zeeco unit by December 5, 2024. Once the flare station is connected to permanent grid power and backup power connection safety disconnect is installed at the Zeeco thermal oxidizer, Respondent shall minimize combustion/control equipment downtime as a result of power failure. Unless there are documented inaccessibility or dangerous conditions for the required technician, or South Coast AQMD approval, Respondent shall complete the first start up cycle of the combustion/control equipment in the following time frames: <ol style="list-style-type: none"> i. If the Zeeco unit experiences downtime: 1.5 hours when the required technician is onsite. If the required technician is not onsite, they will arrive at the site as promptly as possible, safety permitting, but not to exceed 2 hours. ii. If the flares at the flare station experience downtime: the flare(s) associated with the first generator shall complete their initial start up cycle within the time frames listed above, and the flare(s) associated with the second generator may take up to an additional hour to complete their initial start up cycle. <p>In the event that the first complete start up cycle is unsuccessful, Respondent shall successfully restart the combustion/control equipment within 30 additional minutes.</p> <p>In the event Respondent is unable to complete the necessary work to correct the power failure and restart the combustion/control equipment within the timeframes listed above due to inaccessibility or dangerous conditions for the technician, Respondent shall document the conditions that do not allow for the work to be completed within the required timeframe.</p>

	Permit applications for the engine(s) providing power and/or backup power shall be submitted in accordance with Condition Nos. 73 and 79.
NEW 89	<p>For any equipment for which Respondent has submitted a permit application to South Coast AQMD that is not covered under Condition No. 86, and for any equipment for which Respondent is required to submit a permit application to South Coast AQMD, Respondent shall comply with the following requirements until the final approval of such permit application, unless otherwise approved in writing by South Coast AQMD.</p> <p>(a) The equipment and associated ancillary parts shall be properly maintained and kept in good operating condition at all times, which includes, where applicable, following the manufacturer's recommendations and industry best management practices.</p> <p>(b) The equipment shall be operated and maintained by personnel properly trained in its operation.</p>
NEW 90	Respondent shall submit to South Coast AQMD, by January 31, 2025, a complete permit modification application to the Landfill Gas Condensate and Leachate Collection/Storage System (under Permit G66132, A/N 613131) to increase the landfill's liquid storage capacity, including tanks and equipment which have not been described in the applications submitted pursuant to Condition 19 or Condition 57. The submittal shall be accompanied with a complete Title V Revision application and shall be submitted with an expedited permit processing request and associated required fees, forms, and information.
NEW 91	<p>Respondent shall submit to South Coast AQMD, by January 31, 2025, a complete permit application for each hazardous and non-hazardous liquid treatment systems. The submittal shall be accompanied with a complete Title V Revision application and shall be submitted with an expedited permit processing request with associated required fees, forms, and shall include, but not limited to, the applicable information listed in South Coast AQMD Reg. II and below:</p> <p>A. Separate permit applications for each treatment system.</p> <p>B. Process flow diagram for each treatment system illustrating the pathway(s) the liquid is conveyed throughout the system and identifying which tanks the liquid is transferred to and from, including identification of all potential emission release points, the connections to the leachate storage tanks, safety components and the associated specifications, if applicable), monitoring components (if applicable), and identify which components are under vacuum or positive pressure.</p> <p>C. Specify the capacity, dimensions, and number of tanks and vessels in each system. Identify, for each component (e.g. tanks and/or vessels) in each system, whether they have headspaces.</p> <p>D. Standard operating procedures for each system to safeguard from overflow of leachate and ensure minimal fugitive emission release points.</p> <p>E. Leachate flow rates, material usage rates, and process parameters affecting air pollution emissions or needed to determine potential emissions of air pollutants.</p>

NEW 92	Respondent shall send any file(s) with a cumulative size larger than 35 MB via a shared link, by email, which allows South Coast AQMD personnel to be able to download the file(s).
NEW 93/ Revised 87	Respondent shall return for a status and modification hearing on February 12 and 13, 2025, or as soon thereafter as the Hearing Board can schedule the continued hearing.