DATE: August 15, 2024

Chart of Proposed Contested Modifications for August South Coast AQMD Hearing

Key:

- Green text = South Coast AQMD proposed modification
- Blue text = Chiquita Canyon Landfill proposed modification

Condition Number	South Coast AQMD Proposed Modification	Chiquita Canyon Landfill Proposed Modification
42(n)	Landfill materials and refuse which have been exposed to the atmosphere as a result of the excavation, which have not been excavated and relocated for burial or transported off site, shall be immediately, not to exceed ~~2 hours~~30 minutes, safety permitting, covered (with a minimum of 6 inches of clean soil, secured plastic sheeting that is at least 10 mil, or other South Coast AQMD approved cover) whenever excavation is not actively in progress, and at the end of each working day so that no portion of landfill material and refuse is exposed to the atmosphere. Foam by itself shall not be used as a night cover if it is raining or rain is predicted by the National Weather Service prior to the next scheduled day of excavation.	Landfill materials and refuse which have been exposed to the atmosphere as a result of the excavation, which have not been excavated and relocated for burial or transported off site, shall be immediately, not to exceed 30 minutes, safety permitting or unless otherwise approved in writing by South Coast AQMD~~2 hours~~, covered (with a minimum of 6 inches of clean soil, secured plastic sheeting that is at least 10 mil, or other South Coast AQMD approved cover) whenever excavation is not actively in progress, and at the end of each working day so that no portion of landfill material and refuse is exposed to the atmosphere. Foam by itself shall not be used as a night cover if it is raining or rain is predicted by the National Weather Service prior to the next scheduled day of excavation. For the west slope excavation project, Respondent shall follow the timing and cover procedures set forth in the west slope excavation project work plan. If Respondent follows the work plan, it is otherwise exempt from this Condition 42(n).
New subparts to 42	(i) The excavation workface, which exposes refuse or other emission generating material to the atmosphere, shall not exceed 1,000 square feet, without prior written approval from the South Coast AQMD. Estimation of the excavation workface size (square feet) shall be performed every hour during excavation. The daily excavation start date and time, hourly excavation workface size, and time of hourly excavation workface size estimations shall be recorded, and shall be provided to South Coast AQMD personnel within 48 hours of request. (ii) If a South Coast AQMD Rule 402 Nuisance Notice of Violation is received by Respondent during excavation, the approved mitigation measures shall be implemented immediately. Approved mitigation measures: A. Excavation shall be limited to one location at a time. B. Limiting excavation workface, reducing the area by at least 50%, through use of plastic sheeting that is free of tears and defects, 6 inches of clean dirt cover, and/or long duration foam or other suppressant approved in writing by South Coast AQMD C. Minimizing soil disturbance/transfer. D. Limiting working hours, reducing the excavation working hours to 6 total hours for the day (or the number of working hours at the time of receipt of the NOV, if greater than 6 hours). E. Water and/or odor neutralizing products containing no VOC. F. Cleaning and covering of haul trucks. G. Good housekeeping. (iii) During excavation, if any ambient air monitoring stations at the fenceline or in the surrounding community (MS-01 through MS-12) reach or exceed applicable OEHHA acute REL concentrations (e.g. benzene acute REL is 8 ppb 1-hr average, H2S acute REL is 30 ppb 1-hour average), excavation shall cease and approved mitigation measures per Condition XX(iii) above shall be implemented. Excavation shall not resume until concentrations return and remain below the REL threshold(s) for the duration of at least one averaging cycle for the respective acute RELs. The approved mitigation measures shall be implemented when 25% or more of the ambient monitoring stations are down for more than one averaging cycle for the respective acute RELs, or when an ambient monitoring station downwind of the excavation workface	(y) Unless excavation is occurring pursuant to the west slope excavation project work plan, Respondent shall comply with the following requirements: (i) The excavation workface, which exposes refuse or other emission generating material to the atmosphere, shall not exceed 1,000 square feet, without prior written approval from the South Coast AQMD or except where immediate excavation is necessary for the protection of public health and safety. Estimation of the excavation workface size (square feet) shall be performed every hour during excavation. The daily excavation start date and time, hourly excavation workface size, and time of hourly excavation workface size estimations shall be recorded, and shall be provided to South Coast AQMD personnel within 48 hours of request. (ii) If a South Coast AQMD Rule 402 Nuisance Notice of Violation is received by Respondent during excavation, the approved mitigation measures shall be implemented immediately. Approved mitigation measures: A. Excavation shall be limited to one location at a time. B. Limiting excavation workface, reducing the area by at least 50%, through use of plastic sheeting that is free of tears and defects, 6 inches of clean dirt cover, and/or long duration foam or other suppressant approved in writing by South Coast AQMD. After two hours, Respondent may return to the original size of the excavation workface unless there are Unfavorable Wind Conditions, as defined in the Stipulated Order for Abatement in Case No. 6177-1. C. Minimizing soil disturbance/transfer. D. Limiting working hours, reducing the excavation working hours to 6 total hours for the day (or the number of working hours at the time of receipt of the NOV, if greater than 6 hours). E. Water and/or odor neutralizing products containing no VOC. F. Cleaning and covering of haul trucks. G. Good housekeeping. (iii) During excavation, if any ambient air monitoring stations at the fenceline or in the surrounding community (MS-01 through MS-12) reach or exceed applicable OEHHA acute REL concentrations (e.g.

	is down for more than one averaging cycle for the respective acute RELs, which includes but is not limited to calibration, maintenance, breakdown and repair. (iv) During excavation, other emission generating activities such as well drilling in the reaction area, etc. shall be limited and prioritized outside of excavation hours. If landfill gas collection and/or control equipment is offline due to breakdown or maintenance, inhibiting the collection and control of landfill gas, approved mitigation measures per Condition XX(iii) above shall be implemented until the landfill gas collection and/or control equipment is returned to full operation. Respondent shall keep and maintain a log of all non-operation (or downtime) of landfill gas collection and control equipment, with dates, times, duration, and reason for non-operation. This log shall be made available to South Coast AQMD personnel upon request and also shall be included in the weekly report submittal (condition no. 9).	benzene acute REL is 8 ppb 1-hr average, H2S acute REL is 30 ppb 1-hour average), excavation shall cease and approved mitigation measures per Condition 42(y)(ii) above shall be implemented. Excavation shall not resume until concentrations return and remain below the REL threshold(s) for the duration of at least one averaging cycle for the respective acute RELs. The approved mitigation measures shall be implemented when 25% or more of the ambient monitoring stations are down for more than one averaging cycle for the respective acute RELs at the same time, ~~or when an ambient monitoring station downwind of the excavation workface is down for more than one averaging cycle for the respective acute RELs,~~ which includes but is not limited to calibration, maintenance, breakdown and repair. (iv) During excavation, other emission generating activities such as well drilling in the reaction area, etc. shall be limited and prioritized outside of excavation hours. If landfill gas collection and/or control equipment is offline due to breakdown or maintenance, resulting 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)~~inhibiting the collection and control of landfill gas~~, approved mitigation measures per Condition 42(y)(ii) above shall be implemented until the landfill gas collection and/or control equipment is returned to full operation. Respondent shall keep and maintain a log of all non-operation (or downtime) of landfill gas collection and control equipment, with dates, times, duration, and reason for non-operation. This log shall be made available to South Coast AQMD personnel within 48 hours of ~~upon~~ request ~~and also shall be included in the weekly report submittal (Condition 42(x))~~.
66	Respondent shall install and operate a real-time, remote monitoring system which shall, at minimum, monitor well pressure and landfill gas temperature at different well depths (shallow, middle, deep). The remote monitoring system may include monitoring of fixed gases, oxygen, methane, and carbon dioxide, as well as wellfield tuning/optimization and well liquid level monitoring. By April 19, 2024, the Reaction Committee shall submit recommendations regarding installation of the remote monitoring system. By no later than June 21, 2024, contracts to install and operate the monitoring shall be finalized. (a) Submit the finalized contract to install and operate the monitoring that was due June 21, 2024 [per Order for Abatement Condition No. 66 in effect April 24, 2024] 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 August 22, 2024. (b) Submit all known information of design, implementation, installation, and specification issues/concerns by no later than August 22, 2024. This shall include documented correspondence and correspondence reports (for live correspondence prior to August 17, 2024) summarizing results of all communication with system, device, and component vendors/manufacturers and/or contractors identifying the following, including, but not limited to: i. the system, device, and component viability and availability, and ii. 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. (c) Respondent shall contact at least three reputable vendors/manufacturers for each of the systems, devices, and components that have identified issues/concerns as described by Condition No.	Respondent shall install and operate a real-time, remote monitoring system which shall, at minimum, monitor well pressure and landfill gas temperature at different well depths (shallow, middle, deep). The remote monitoring system may include monitoring of fixed gases, oxygen, methane, and carbon dioxide, as well as wellfield tuning/optimization and well liquid level monitoring. By April 19, 2024, the Reaction Committee shall submit recommendations regarding installation of the remote monitoring system. By no later than June 21, 2024, contracts to install and operate the monitoring shall be finalized. (a) Submit the finalized contract to install and operate the monitoring that was due June 21, 2024 [per Order for Abatement Condition No. 66 in effect April 24, 2024] 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 August 22, 2024. (b) Submit all known information of design, implementation, installation, and specification issues/concerns by no later than August 22, 2024. This shall include documented correspondence and correspondence reports (for live correspondence prior to August 17, 2024) summarizing results of all communication with system, device, and component vendors/manufacturers and/or contractors identifying the following, including, but not limited to: i. the system, device, and component viability and availability, and ii. 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. (c) 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(b) requesting and facilitating in obtaining proposed solutions and recommendations for each of the identified

	66(b) 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, September 12, 2024. (d) Respondent shall submit the findings and solutions to issues documented in Condition 66 (a) to (c), which shall include any additional communication from contacting various vendors, manufacturers of systems, components, and devices by no later than September 26, 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)]. (i) 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 vertical wells and the depth of the down-well temperature probes. The findings and solutions shall also include an inventory and installation timeline of the temperature monitoring probe network approved by the U.S. Environmental Protection Agency under the Unilateral Administrative Order. (e) The remote monitoring system shall be installed and in operation no later than ~~October~~November 22, 2024 or other date as approved in writing by South Coast AQMD, on all wells operated in the Initial Reaction Area (defined as the boundary of Cells I/2A, 2B/3, 4, and Module 2B/3/4 P2 as specified in Condition No. 9(a)). (f) To request an extension to the deadline as described in Condition 66(d and/or e), Respondent shall submit a written request 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)at least 15 days prior to the deadline. The extension request shall, at minimum, include the following information: 1) The increments of progress for contracts, design, implementation, installation, and operation completed thus far, with contracts, schematics, specifications, associated Gantt chart project timeline, and photos. 2) The increments of progress for contracts, design, implementation, installation, and operation that have yet to be completed. 3) Explanation and description of any delays or circumstances necessitating the extension. 4) The date of extension being proposed.	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, September 12, 2024. (d) Respondent shall submit the findings and solutions to issues documented in Condition 66 (a) to (c), which shall include any additional communication from contacting various vendors, manufacturers, or distributors of systems, components, and devices by no later than September 26, 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)]. (i) 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 vertical wells and the depth of the down-well temperature probes. The findings and solutions shall also include an inventory and installation timeline of the temperature monitoring probe network approved by the U.S. Environmental Protection Agency under the Unilateral Administrative Order. (e) Respondent shall install the initial ~~The~~ remote monitoring system in 10 vertical wells, with the equipment installed and operational in the first six (6) vertical wells by ~~shall be installed and in operation no later than~~ October 22, 2024, or other date as approved in writing by South Coast AQMD, and the equipment installed and operational in the next four (4) vertical wells by December 15, 2024, or other date as approved in writing by South Coast AQMD. The wells for the initial remote monitoring system shall be selected to provide a representative sample of the range of temperatures experienced by the vertical wells ~~on all wells~~ operated in the Initial Reaction Area (defined as the boundary of Cells I/2A, 2B/3, 4, and Module 2B/3/4 P2 as specified in Condition No. 9(a)). The initial remote monitoring system shall not include wells with pumps due to concern of pump loss, damage to sensor equipment, and because Lorenz pumps are capable of measuring temperature and liquids level. (f) By January 31, 2025, the Reaction Committee shall submit a report on the viability and functionality of the initial monitoring system and usefulness of the data collected. If the Reaction Committee recommends expansion of the initial monitoring system, the Reaction Committee shall include recommendations on the timeline and scope of the expansion, which balance the need to expeditiously dewater the landfill with the additional data collection. (g) To request an extension to the deadline as described in Condition 66(d and/or e), Respondent shall submit a written request 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) at least 15 days prior to the deadline. The extension request shall, at minimum, include the following information: 1) The increments of progress for contracts, design, implementation, installation, and operation completed thus far, with contracts, schematics, specifications, associated Gantt chart project timeline, and photos.

		2) The increments of progress for contracts, design, implementation, installation, and operation that have yet to be completed. 3) Explanation and description of any delays or circumstances necessitating the extension. 4) The date of extension being proposed.
(75)	Respondent shall reduce its maximum exposed daily working face area to no more than 50% of its permitted daily maximum, or ½ acre, allowed under Conditional Use Permit Number 2004-00042-(5), issued by Los Angeles County.	None
(77)	Within 10 days of the issuance of this Order, Respondent shall cease accepting waste and temporarily cover the working face during the hours of 7:00am and 10:00am during any operating day.	None
(86)	Respondent shall comply with the following requirements until the final approval of liquid/condensate/leachate treatment and/or storage permits, for all liquid treatment and storage equipment operating on site, unless otherwise approved in writing by South Coast AQMD. a. The equipment shall be properly maintained and kept in good operating condition at all times in accordance with manufacturer's recommendations and industry best management practices. b. The equipment shall be operated and maintained by personnel properly trained in its operation. Training certifications and/or detailed qualifications for these personnel shall be maintained on site, and provided to South Coast AQMD personnel upon request. c. The operation of the equipment shall 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. By November 1, 2024, Respondent shall install sampling ports on all leachate tanks, and collect samples from the sampling ports thereafter. d. The liquid treatment system, leachate tanks, sludge/solids handling equipment and tanks, and any other equipment associated with the treatment or storage processes shall be fully enclosed, under vacuum, and vented to appropriate control (i.e. flare station). This does not include the liquid treatment granular activated carbon adsorbers, or liquid filtration equipment which operate under positive pressure. Storage tanks with vapor headspace shall not be excluded from the requirements of Condition no. 86(d). e. Respondent shall inspect any liquid treatment system equipment under positive pressure for vapor leaks at least once each day, as follows: i. Leak inspections shall be conducted by applying a surfactant-based solution or mixture over each potential leak source(s) (e.g. ducting, device, or equipment connections and joints) and observing potential leak site(s) to determine if any leaks are observed (e.g. bubbles are formed), or other alternative method approved by South Coast AQMD. ii. All leaks shall be repaired within one calendar day of detection, unless otherwise approved in writing by South Coast AQMD. 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.	Respondent shall comply with the following requirements until the final approval of liquid/condensate/leachate treatment and/or storage permits, for all liquid treatment and storage equipment operating on site, unless otherwise approved in writing by South Coast AQMD. a. The equipment shall be properly maintained and kept in good operating condition at all times in accordance with manufacturer's recommendations and industry best management practices. b. The equipment shall be operated and maintained by personnel properly trained in its operation. Training certifications and/or detailed qualifications for these personnel shall be maintained on site, and provided to South Coast AQMD personnel upon request. c. The operation of the equipment shall 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. By December 2~~November 1~~, 2024, Respondent shall install sampling ports on all leachate tanks and thereafter shall collect samples from such sampling ports. d. The liquid treatment system, leachate tanks, sludge/solids handling equipment and tanks, and any other equipment associated with the treatment or storage processes shall be fully enclosed, under vacuum, and vented to appropriate control (i.e. flare station). This does not include the liquid treatment granular activated carbon adsorbers, or liquid filtration equipment which operate under positive pressure. Storage tanks with vapor headspace shall not be excluded from the requirements of Condition no. 86(d). ~~e. Respondent shall inspect any liquid treatment system equipment under positive pressure for vapor leaks at least once each day, as follows:~~ ~~i. Leak inspections shall be conducted by applying a surfactant-based solution or mixture over each potential leak source(s) (e.g. ducting, device, or equipment connections and joints) and observing potential leak site(s) to determine if any leaks are observed (e.g. bubbles are formed), or other alternative method approved by South Coast AQMD.~~ ~~ii. All leaks shall be repaired within one calendar day of detection, unless otherwise approved in writing by South Coast AQMD.~~ ~~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 connected to the liquid treatment system, leachate tanks, solid handling tanks, 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.	e. 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. f. ~~Sample ports shall be~~ Flow meters connected to the liquid treatment system, leachate tanks, solid handling tanks, 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.