



South Coast Air Quality Management District

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Office of the Executive Officer
Wayne Nastri
909.396.2100

October 16, 2026

Kevin Green
District Manager
Chiquita Canyon, LLC
29201 Henry Mayo Dr.
Castaic, CA 91384

Megan L. Morgan.
Counsel for Chiquita Canyon, LLC
Beveridge & Diamond PC
201 North Charles St., Suite 2210
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Subject: Notice of Order of Source Testing under South Coast Air Quality Management
District Rule 304

Dear Mr. Green:

I am notifying you that I am taking action under South Coast AQMD Rule 304 on *Equipment, Materials, And Ambient Air Analysis*. This action applies to Chiquita Canyon, LLC ("CCL"), as operators of the source herein called the Chiquita Canyon Landfill (the "Landfill"), which includes permitted equipment and equipment requiring a permit, located at 29201 Henry Mayo Dr., Castaic, California 91384 (SCAQMD Facility ID No. 119219). The air pollutants that are the subject of this action are Methane and Volatile Organic Compounds (VOCs), including Gaseous Non-Methane Organics and Speciated VOCs. In accordance with South Coast AQMD Rule 304, I am making the following findings and determinations as discussed below.

On February 10, 2026, the South Coast AQMD's Office of Compliance and Enforcement served a Notice to Comply (E56457) directing CCL to, in part, expeditiously submit source test protocols and conduct source testing to demonstrate that the Clean Cap Hero Thermal Oxidizer ("TOx"), A/N 661284, complies with the California Air Resources Board's ("CARB") Landfill Methane Rule ("LMR"), 17 CCR § 95464(b)(3)(A) - *Requirements for Gas Control Devices other than Flares*.

On May 13, 2026, the required source testing for the TOx was conducted by Montrose Air Quality Services (now Onterris) pursuant to a South Coast AQMD approved protocol. The resulting test report, issued on October 12, 2026, revealed that the TOx had only achieved a methane destruction efficiency of 83.1 percent by weight, substantially less than the minimum destruction efficiency of 99 percent by weight required by 17 CCR § 95464(b)(3)(A)(1). The lack of sufficient methane destruction, in conjunction with the relationship between methane and total gaseous non-methane organics, provides a reasonable basis to believe that other known organics within the landfill gas are insufficiently destroyed by the TOx.

I find that a further analysis of the emissions from the TOx, pursuant to Rule 304(a), is necessary to determine the extent and amount of pollutants being discharged to the atmosphere. I am therefore able to order, and direct South Coast AQMD personnel to perform, all appropriate source testing. I understand the facility is currently obligated by Condition No. 22, subdivisions (a) and (d), of the Stipulated Order for Abatement (Case No. 6177-4) (“Order”) to perform this testing, and plans to do so by December 23, 2026.¹ This is simply not fast enough. As demonstrated in monthly reports submitted to South Coast AQMD pursuant to Condition 8 of the Order, gas routed to the TOx contains exceptionally high levels of toxic organic compounds, such as Benzene.² Indeed, gas composition analysis shows concentrations of benzene have steadily risen by more than 500% over the last 6 months to more than 300 ppmv.

Consistent with Rule 304(d), testing may be accomplished by qualified personnel of the South Coast Air Quality Management District using procedures, methods, and conditions prescribed by the Executive Officer. I am ordering so in this matter. As such, on October 21, 2026, or as otherwise noticed and modified, Air Quality Engineers from the Source Test Engineering Department of South Coast AQMD’s Monitoring and Analysis Division will perform the ordered testing at the Landfill. Specifically, these personnel may perform various test procedures upon the TOx, including at the inlet, exhaust, and associated components, to analyze Methane and Total Gaseous Non-Methane Organics, Speciated VOCs, Oxygen, Carbon Dioxide, landfill gas fuel, and flow rate, using tedlar bags, air sampling canisters, or other capturing and metering devices, and consistent with the following methods: EPA 18, EPA 19, EPA TO-15A, SCAQMD Method 10.1, ATSM D1945 and D3588, Rule 1150.1, and/or any other equivalent or appropriate method.

As my authorized representatives, South Coast AQMD personnel tasked with performing this testing have a right, under HSC § 41510, to enter the Landfill’s premises to inspect such source, including to secure samples of emissions from the TOx, which is an air pollution emission source. Should CCL’s employees, contractors, or representatives refuse entry, the South Coast AQMD will take steps to secure entry by seeking a temporary restraining order, preliminary injunction, inspection warrant pursuant to CCP § 1822.50, or other such legal remedy.

¹ Chiquita submitted a protocol for this testing on September 24, 2026, with testing to be conducted on December 22 to 23, 2026.

² The landfill gas is measured at the inlet to the TOx and analyzed via EPA Method TO-15 pursuant to Condition 5 of the Order.

Furthermore, fees associated with testing performed by District personnel may be charged to CCL in accordance with Rules 304(e), 304(f) and/or 304.1. The determination of whether fees are owed, and their amount, shall be made following review of the result of such testing. Thereafter, consistent with Rule 304(i), the District's accounting office will give notice of the fees to be paid. Note that Rule 304 provides that any failure to pay fees within 60 days of such notice shall constitute a violation of the Rule.

If you have any questions concerning this letter, please contact Principal Deputy District Counsel Ryan P. Mansell directly at (909) 396-2387.

Sincerely,

A handwritten signature in black ink, appearing to read "Wayne Natri", with a stylized flourish at the end.

Wayne Natri
Executive Officer