

**Appendix 1: Reserved Conditions**

No.	Condition Language
3	<p>Respondent shall expedite, to the maximum extent feasible, replacement of granular activated carbon media in the Landfill Gas Treatment System (under Permit G55163, A/N 603249), including the execution of contracts, as well as the delivery, replacement, startup, and testing of any operation necessary to replenish and/or replace spent granular activated carbon media in the Landfill Gas Treatment System. Respondent shall ensure adequate stock of all odor control products and supplies are maintained on site.</p>
5(b)(ii)-(iii)	<p>ii. Colorimetric tube readings shall be conducted by taking a reading from a Tedlar bag sample using an appropriate colorimetric tube sample collection pump. All sampling shall be performed in accordance with the operational manual for the colorimetric tube sample collection pump.</p> <p>iii. Colorimetric tube readings shall use colorimetric tubes of appropriate concentration range and shall be reported as follows:</p> <ol style="list-style-type: none"> <li>1. Respondent shall first use the estimated appropriately ranged colorimetric tube.</li> <li>2. If the resulting reading reaches the upper concentration of the colorimetric tube concentration range, subsequent reading(s) shall be taken using a colorimetric tube with a concentration range that has a larger upper concentration threshold until the result is not the upper concentration threshold of the concentration range. Report the tube concentration range and tube concentration result for each reading.</li> <li>3. If the reading results in the lower concentration of the colorimetric tube concentration range or does not register a result, subsequent reading(s) shall be taken using a colorimetric tube with a concentration range that has a smaller lower concentration threshold, if available, until the colorimetric tubes available to the facility result in: <ol style="list-style-type: none"> <li>a. A reading that is within the concentration range of the tube,</li> <li>b. A reading is the lower concentration of the colorimetric tube concentration range, or</li> <li>c. The colorimetric tube does not register a result.</li> </ol> </li> <li>4. When the result is the lower concentration of the colorimetric tube concentration range or does not register a result, the lower concentration of the colorimetric tube concentration shall be considered the concentration result. Report the tube concentration range and tube concentration result for each reading. If a lower range colorimetric tube is not used and the tube concentration result is below the lower range of the colorimetric tube used, Respondent shall report the result as “less than” or “&lt;” the lower range value of the tube. Notwithstanding the forgoing, Respondent shall ensure that the colorimetric tube</li> </ol>

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	result is below the upper 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.
8(d)	Estimated schedule for any replacement or refurbishment of granular activated carbon media in the Landfill Gas Treatment System (under Permit G55163, A/N 603249) identified in Condition No. 3. The landfill gas temperature at inlet of the Landfill Gas Treatment System (under Permit G55163, A/N 603249) identified in Condition No. 3(a).
8(e)	Description of any problems or delays, if any, encountered or projected to occur pertinent to the execution of contracts, as well as the delivery, replacement, startup, and testing of any operation necessary to replenish and/or replace spent granular activated carbon media in the Landfill Gas Treatment System (under Permit G55163, A/N 603249). Respondent shall submit copies of documents or other records to support any problems or delays noted pursuant to this Condition No. 8(e) along with such description.
8(f)	Specifications of the equipment and materials used for the weekly colorimetric tests (only if there is a change from the previously provided specifications of the colorimetric instrumentation or method used).
12(g)(i)	A study into known and possible methods for effective treatment of DMS and preventative mechanisms for DMS formation in landfill gas, including assessment of other landfills and review of scientific studies. By no later than April 30, 2024, Respondent shall provide a report detailing the findings of this Landfill Gas DMS Treatment Study and the proposals for implementation of the treatment methods. This 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)]. Respondent shall submit any required permit applications, with information included, for equipment installations or modifications necessary for implementation of the remedy strategies and/or treatment methods;

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12(g)(ii)	<p>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)];</p>
12(g)(iii)	<p>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 Quality Engineer, (ndickel@aqmd.gov), and Christina Ojeda, Air Quality Inspector, (cojeda@aqmd.gov)], the feasibility and availability findings of this fenceline and community DMS monitoring program. The findings shall identify all companies, vendors, contractors, and consultants that were inquired regarding the feasibility and availability and the results for each inquiry, including an ultimate decision if monitoring is feasible. If the Reaction Committee deems monitoring under this provision feasible, Respondent shall prepare and submit 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)] a workplan for the installation of and operation of the required monitoring equipment and related installations within thirty (30) days of the Reaction Committee’s decision. This workplan will include a timeline for procurement of monitoring equipment and for the commencement of monitoring. It will also include a timeline for reporting out on the collected data, including a proposal relating to the real-time posting of monitoring data on Respondent’s website or other regular report-outs on the data;</p>

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12(g)(iv)	<p>A study and report on landfill best management practices and alternative methods to minimize the release of fugitive surface gas and minimize odors from fugitive surface gas, including cover practices at the Reaction Area (as defined in Condition 9(a)) and working face, and how best to address related odorous emissions, such as through the use of misting systems, fans, odor neutralizer, or other means. By no later than November 6, 2023, Respondent shall submit a report detailing the findings of this Fugitive Landfill Gas Odor Mitigation Study and the proposals for the minimization of landfill gas release and odors. This 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)];</p>
12(g)(v)	<p>A report on the known health risks from acute and long-term exposure to DMS, including any action levels from other public health or government entities, and including a summary of recommended actions for persons exposed to DMS for acute and long-term durations. By no later than January 15, 2024, Respondent shall submit this report 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)];</p>
12(g)(vi)	<p>A report of the health impacts from ongoing and long-term (e.g. greater than one year) exposure to hydrogen sulfide (H<sub>2</sub>S), or other speciated sulfur compounds, and any other hazardous air pollutants (HAPs), as defined in the federal Clean Air Act, 42 U.S.C. § 7412. The HAPs evaluated in the report shall include those which are detected: (1) in landfill gas over the past twelve months at the Chiquita Canyon Landfill as documented in the initial or additional flux chamber study (per Condition No. 12(f)) or detected in stack emissions testing; (2) in the liquids and leachate samples collected and analyzed (per Condition No. 37); (3) in air sampling performed to determine emissions from exposed liquids/leachate; and (4) in the community pursuant to the enhanced community air monitoring program in exceedance of recommended toxicity screening values published by the US EPA or other applicable screening values where US EPA toxicity screening values are unavailable. The report shall include, but not be limited to, assessment and analysis of any action levels from other public health or government entities in the United States for any such constituents, recommended actions for persons exposed to such constituents, and recommendations on how to limit any anticipated adverse health impacts. Such report shall also include a summary of all findings, health impacts and recommendations in an easy-to-read format designed for distribution to and use by the public. By no later than August 1, 2024, Respondent shall submit this</p>

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	<p>report 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)]; and</p>
<p>12(g)(viii)</p>	<p>The Reaction Committee, on behalf of Respondent, shall conduct an investigation into the existing landfill gas collection and conveyance piping materials (e.g. high-density polyethylene (HDPE)), alternative landfill gas collection and conveyance piping materials, and current landfill conditions to determine whether the existing HDPE piping is appropriate for the current and expected future temperature conditions at the landfill, and to determine whether viable alternative landfill gas collection/conveyance piping materials exist, which shall include investigation results of materials used by other landfills that have experienced high temperature events. The investigation shall include a study of the material properties, specifications, and ratings and manufacturer’s operating properties of piping (e.g. HDPE) within a landfill, including but not limited to, short term maximum manufacturer’s temperature rating, long-term manufacturer’s maximum temperature rating, effects and associated timeline of effects from operating above manufacturer rated temperatures or specifications, effects and associated timeline effects from consistent exposure of piping to sunlight, ability to convey landfill gas with minimal fugitive vapor leaks, and pliability for integrity of the system during landfill settlement or other common landfill operations or occurrences. These properties shall then be compared with several landfill gas conveyance piping material alternatives. Respondent shall submit a report on this investigation which includes the details of the material and manufacturer operating properties and specifications of piping (e.g. HDPE) and alternative piping as specified above. It shall additionally detail existing and future expected landfill gas temperatures within the landfill gas conveyance piping, including expected temperatures within the piping leaving the landfill gas extraction wells and within the larger conveyance header within the Reaction Area. If applicable, it shall additionally include an analysis on existing landfill gas conveyance piping and future planned piping, and associated piping lengths and diameters, which conveys or will convey landfill gas above the existing HDPE piping’s manufacturer rated temperature threshold. Finally, the report shall include a recommendation of the appropriate piping material to use moving forward and when existing piping materials shall be replaced with more robust materials or replaced with existing materials at higher frequencies, at the landfill while the landfill is experiencing elevated temperatures. This report shall be submitted by June 21, 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)].</p>

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13	<p>Respondent shall expand its gas well system. Respondent shall continue to operate the two sumps with pumps along the west slope until final design is implemented. Additional landfill gas collection equipment shall be operated as construction is completed. Respondent has installed 18 vertical dual extraction wells, and these 18 vertical dual extraction wells shall be connected to the landfill gas system by September 15, 2023 unless the circumstances outlined in Condition 13(a) apply.</p> <p>a. In the event Respondent is unable to meet these deadlines due to inaccessibility or dangerous conditions for a technician, Respondent shall document the date and the conditions that do not allow the installation of the wells and/or their connection to the landfill gas system. Respondent shall submit this documentation to the South Coast AQMD and provide the South Coast AQMD with an updated date of completion for the required work.</p>
15(a)	<p>By January 31, 2024, Respondent shall provide to the South Coast AQMD [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)] the design and installation schedule for a minimum of an additional seventy (70) wells and their associated piping. The proposed well locations and connecting piping shall be identified on a drawing which shows the entire gas collection system and shall be described in writing. Estimated gas 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);</p>
15(b)(i)	<p>By July 1, 2024, installation of 50% of wells necessary to achieve the well installation density; and</p>
15(b)(ii)	<p>By October 1, 2024, installation of 75% of wells necessary to achieve the well installation density.</p>
16	<p>Respondent shall submit, by October 6, 2023, a complete permit modification application for the Landfill Gas Collection System (under Permit G43917, A/N 578102) to increase the number of permitted wells in the well field. 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.</p>

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18	<p>Respondent shall, in addition to the installation of dewatering sumps/pumps specified in Condition No. 17 above, within ninety (90) days of the issuance of the Initial Order, provide proposed Reaction Area dewatering guidelines and implementation procedures for the landfill to South Coast AQMD (Baitong Chen, Air Quality Engineer, (bchen@aqmd.gov); Nathaniel Dickel, Senior Air Quality Engineer, (ndickel@aqmd.gov)) that include but are not limited to the following:</p> <ul style="list-style-type: none"> <li>a. Proposed methodologies and monitoring procedures that determine the level of dewatering within the Reaction Area (as defined in Condition 9(a)) wells impacted by liquid. Methods may include the measurement of the gas flow at each landfill gas collection well impacted by liquids;</li> <li>b. Use of dewatering pumps or other methods to remove liquids from Reaction Area (as defined in Condition 9(a)) wells impacted by liquids;</li> <li>c. An implementation plan for the use of dewatering pumps or other methods to remove liquids from the Reaction Area wells impacted by liquids. The plan shall include a list of wells in the Reaction Area and depth where liquids are expected to impact landfill gas collection efficacy or be a concern, the proposed action to remove the liquids, and the schedule for liquid removal. The implementation plan shall also include pro-active measures, such as additional dewatering pumps, to be installed at landfill gas collection wells where liquid impaction issues have not yet occurred, but may be expected to occur.</li> <li>d. Upgrades to the site leachate collection system as needed, including through the addition of increased air compressor and/or drain line infrastructure;</li> <li>e. Protocols for the pumping and monitoring of dewatering pumps and other such methods to remove water from Reaction Area (as defined in Condition 9(a)) wells impacted by liquids;</li> <li>f. Well field liquid sounding in the Reaction Area (as defined in Condition 9(a)), and a proposed schedule for conducting liquid sounding on a consistent basis;</li> <li>g. A timeline for appropriate reporting on impacted wells;</li> <li>h. The feasibility of integrity testing of all vertical gas wells in the Reaction Area (as defined in Condition 9(a)) and a timeline and protocol for addressing any wells that the integrity testing demonstrates are damaged or are exhibiting temperatures of at least 170 degrees Fahrenheit; and</li> <li>i. A timeline for implementation of appropriate dewatering procedures upon discovery of wells impacted by liquids.</li> </ul>
19	<p>Respondent shall submit, by October 6, 2023, 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. The submittal shall be accompanied with a complete Title V</p>

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	Revision application and shall be submitted with an expedited permit processing request and associated required fees, forms, and information.
20	<p>Respondent shall increase its landfill gas control capacity. Respondent has submitted a permit application for a new 6,000 scfm ultra-low emissions landfill gas flare (Flare No. 3), which is currently in a public comment period. Once the flare is fully permitted and fully operational equipment is received, Respondent shall have forty-five (45) days to finish installation and begin operating the new landfill gas flare unless the circumstances outlined in Condition No. 20(a) apply. Respondent shall notify the South Coast AQMD that the new landfill gas flare is operational within 48 hours of beginning operation (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)).</p> <p>a. In the event Respondent is unable to meet these deadlines due to inaccessibility or dangerous conditions for a technician, Respondent shall document the date and the conditions that do not allow the installation of the new flare. Respondent shall submit this documentation to the South Coast AQMD and provide the South Coast AQMD with an updated date of completion for the required work.</p>
21	Respondent shall submit, by October 31, 2023, a complete permit application for the new construction of a Landfill Gas Flare (Flare No. 4) to increase the landfill gas control capacity. 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.
26	Respondent shall investigate and report on the feasibility of temporary containment measures for the purposes of controlling leachate and possible discharges of pressurized leachate when drilling additional holes for wells, liquid pumps, temperature devices, or other purposes. This Discharge of Pressurized Leachate Containment Feasibility Study shall include an analysis on the feasibility of a temporary tenting, containment vessel(s)/dome(s), other enclosure(s), or partial enclosure system designed to collect and contain the leachate flow while limiting the escape of odors produced from drilling/ discharges of pressurized leachate, to allow for additional well drilling in the Reaction Area. By no later than March 12, 2024, Respondent shall submit 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)], a report on the findings of this feasibility study.

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32	<p>The Reaction Committee shall review air dispersion modeling, smoke release studies, and computational fluid dynamics (“CFD”) modeling that have previously been completed for the landfill to assess odor and emissions transport into the nearby community. The Reaction Committee shall use the previous models updated with current datapoints to undertake a study to determine odor and emission transport of odors from the landfill and to identify effective techniques that may be used to remedy potential odor impacts on the nearby community. The study shall include an evaluation of the efficacy of odor control measures, including but not limited to perimeter misting equipment, wind barriers, wind cutter fans, and odor dispersion/misting fans, for purposes of minimizing odors in the surrounding community. The study shall be based on both the landfill’s current and projected closure in 2047, topography and configuration. The study shall include, but not be limited to, identifying transport trajectories and quantifying odor gas concentrations within the surrounding community. Upon completion of the study, a written report documenting the study and the findings, shall be submitted to South Coast AQMD by December 1, 2023. [Baitong Chen, Air Quality Engineer, (bchen@aqmd.gov); Nathaniel Dickel, Senior Air Quality Engineer, (ndickel@aqmd.gov); Christina Ojeda, Air Quality Inspector, (cojeda@aqmd.gov)].</p> <ul style="list-style-type: none"> <li>a. The report shall include a recommendation on whether additional modeling is recommended to fully address the current odor circumstances at the landfill and potential odor impacts on the nearby community.</li> <li>b. If such additional modeling is recommended by the Reaction Committee, the Reaction Committee shall, within 45 days of providing the report and recommendation, provide a proposal to the South Coast AQMD that shall, at a minimum, include the following: <ul style="list-style-type: none"> <li>i. The identification and qualifications of the primary personnel and/or firms proposed to conduct the study, as well as the specific techniques and location(s) where the study will be conducted;</li> <li>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.</li> </ul> </li> <li>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</li> </ul>

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	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)).
36(b)	Until installation of the additional instrumentation is complete, Respondent shall increase the number of 24-hour time integrated canister sampling and analysis taken and analyzed for VOCs at MS-06 through MS-12 to three times per week.
37	Respondent shall, by March 5, 2024, take at least ten liquid samples from wells with pumps located in the Reaction Area, including wells with the highest average temperatures to the extent feasible. Respondent shall submit the liquid samples to a laboratory for analysis. Sampling and analysis shall be performed per U.S. EPA Method 624.1. Respondent shall, within 1 week of receipt from the contract laboratory, submit the results 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)). With the results, Respondent shall also submit laboratory analysis from samples taken on October 20, 2023 from leachate seeps on the western slope of the Reaction Area.
38	Respondent shall take at least one representative monthly sample of liquids from the Reaction Area of the Landfill and at least one representative monthly sample of leachate from the bottom tanks where liquids/leachate from the entire Landfill collect and analyze them per U.S. EPA Method 624.1 for the presence of volatile organic compounds (VOCs) and toxic air contaminants (TACs). In the event that Respondent demonstrates, to the satisfaction of South Coast AQMD, that generated liquid/leachate is sufficiently collected with no remaining seepage or potential for discharges of pressurized leachate, then the leachate sampling and analysis shall be reduced to a quarterly schedule. If further leachate seepage or discharges of pressurized leachate are found to occur, resulting in the exposure of the liquid/leachate to atmosphere, then the sampling and analysis shall return to a

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	<p>monthly schedule. Respondent shall, within 1 week of receipt from the contract laboratory, post the analytical results on Respondent’s website, and provide to South Coast AQMD along with a detailed description and depiction of the sampling locations (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)).</p>
41	<p>Respondent shall submit, by January 30, 2024, a complete plan application for a Rule 1150 Landfill Excavation Plan. The submittal shall be accompanied with a complete Title V Revision application and shall be submitted with an expedited processing request and associated required fees, forms, and information. A generic Rule 1150 plan application and Title V Revision application shall include the following:</p> <ol style="list-style-type: none"> <li>a. A signed and completed Form 400-A.</li> <li>b. A signed and completed Form 400-CEQA.</li> <li>c. Reason for excavation.</li> <li>d. A site summary indicating the site history.</li> <li>e. A list of materials buried or suspected materials buried in the site based on available records.</li> <li>f. Results of any boring tests done to characterize the disposal site.</li> <li>g. Results of recent landfill gas analysis or soil vapor phase analysis including the concentrations of methane, sulfur compounds, and speciated non-methane hydrocarbons.</li> <li>h. A plot plan indicating the location of the excavation, staging areas, vehicle route(s), vehicle cleaning area, and any nearby buildings, roadways, or other site identifying 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.</li> <li>i. Operating schedule for excavation and removal (hours/day, days/week, weeks/year, or equivalent).</li> <li>j. Scheduled excavation starting and completion dates, and number of working days required for the excavation.</li> <li>k. Description of how the excavation will be conducted, including excavation equipment and vehicles hauling the excavated material.</li> <li>l. Description of mitigation measures for dust, odors, and hydrocarbons.</li> <li>m. Description of monitoring to be conducted, including monitoring equipment and techniques.</li> <li>n. Total amount of material to be excavated in cubic yards under this project.</li> </ol>

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	<ul style="list-style-type: none"> <li>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).</li> <li>p. Maximum surface area of excavation workface.</li> <li>q. Maximum surface area of refuse or contaminated material to be exposed to atmosphere at any one time.</li> <li>r. Fees in the amount \$1,090.43 (for Title V facilities, fee schedule FY 23-24).</li> <li>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).</li> <li>t. A signed Form 400-XPP and additional 50% more fees from the plan fees listed above (\$545.22).</li> </ul>
56	<p>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 completed no later than April 4, 2024. Samples shall be collected and analyzed from the following equipment/locations:</p> <ul style="list-style-type: none"> <li>a. the vapors in the headspace of at least one untreated leachate storage tank (preferentially containing leachate that is determined to be hazardous or assumed to be hazardous in accordance with hazardous material requirements by respective regulatory agencies, e.g. U.S. EPA and/or DTSC);</li> <li>b. the vapors in the headspace of at least one leachate storage tank undergoing treatment at;</li> <li>c. the vapors in the headspace of at least one leachate storage tank where treatment is complete.</li> </ul> <p>Each of the sampled storage tanks shall be filled at least 2/3 full of leachate (approximately 14,000 gallons). Tanks to be sampled shall be preferentially selected to be those not connected/vented to the landfill gas collection system and/or landfill gas control systems. Vapor sampling and analysis of the headspace shall be conducted for total sulfur compounds as H<sub>2</sub>S and speciated sulfur compounds pursuant to South Coast AQMD Method 307-91, and for speciated organic compounds pursuant to U.S. EPA Method TO-15. Sampling and analysis shall be performed by a South Coast AQMD Laboratory Approval Program (LAP) approved laboratory(ies), capable of sampling and analysis per South Coast AQMD Method 307-91 and U.S. EPA Method TO-15, respectively. A report detailing the sampling and analysis parameters and complete laboratory analysis results shall be submitted to South Coast AQMD by April 18, 2024 [Baitong Chen, Air Quality Engineer, (bchen@aqmd.gov); Nathaniel Dickel, Senior Air Quality Engineer, (ndickel@aqmd.gov); Christina Ojeda, Air Quality</p>

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	Inspector, (cojeda@aqmd.gov)]. The report shall include, at a minimum, identification of the leachate tank(s) sampled, sample location within each leachate tank, vapor/liquid connections, ventilation (if applicable) and configuration of the tank(s) which were sampled, temperature of the leachate at time of sampling, date/time of sampling, treatment status of the tank(s), volume of leachate within the tank(s), and complete laboratory sampling and analysis results.
57	Respondent shall submit, by April 22, 2024, 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. 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.
58	Respondent shall submit, by June 21, 2024, a complete permit application for the operation of the thermal oxidizer (pursuant to Condition 29) to include the thermal oxidizer under Respondent's Title V permit. 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.
59	Respondent shall submit, by June 21, 2024, a complete permit application for the Landfill Gas Condensate and Leachate Treatment System, which includes treating hazardous liquid waste. 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.
60	Respondent shall submit, by April 22, 2024, a complete permit modification application to the Landfill Gas Collection System (under Permit G43917, A/N 578102) to include the tie-in of the landfill gas condensate and leachate treatment system vapor vent lines to the Landfill Gas Collection System. 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.
61	Respondent shall submit, by May 21, 2024, a complete permit modification application to the Landfill Gas Flare System (under Permit G73696, A/N 645450) to include the combustion of vapor vented from the hazardous liquid tanks in the landfill gas condensate and leachate collection/storage tank system

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	and landfill gas condensate and leachate treatment system. 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.
62	Respondent shall submit, by May 21, 2024, a complete permit modification application to the Landfill Gas Flare System (under A/N 624296) to include the combustion of vapor vented from the hazardous liquid tanks in the landfill gas condensate and leachate collection/storage tank system and landfill gas condensate and leachate treatment system. 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.
66(a), (a)(i)-(vi)	<p>a. Respondent shall investigate a real-time, remote monitoring system which shall, at minimum, monitor well pressure and landfill gas temperature at the well head. 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 September 17, 2024, contracts to install and operate the monitoring system in Condition No. 66(a)(v) shall be finalized.</p> <p>i. 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 September 17, 2024.</p> <p>ii. Submit all known information of design, implementation, installation, and specification issues/concerns by no later than September 17, 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:</p> <ol style="list-style-type: none"> <li>1. the system, device, and component viability and availability, and</li> <li>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.</li> </ol> <p>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.</p>

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	<p>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.</p> <p>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)].</p> <p>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 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.</p> <p>v. A remote monitoring system shall be installed and in operation no later than December 31, 2024, or other date as approved in writing by South Coast AQMD. Temperature shall be measured in at least twenty (20) wellheads operated in the Initial Reaction Area (defined as the boundary of Cells 1/2A, 2B/3, 4, and Module 2B/3/4 P2 as specified in Condition No. 9(a)). By October 15, 2024, the Reaction Committee shall determine the location for installation of the remote monitoring system equipment and shall submit its determination 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)]. Should any of the remote monitoring system equipment fail due to the ETLF conditions at the Landfill, Respondent does not need to replace it.</p> <p>vi. By January 31, 2025, the Reaction Committee shall submit a proposal to assess the viability and functionality of a remote monitoring system which measures temperature and pressure within a well with a pump located within the Reaction Area, including assessment of multiple depths within the well (e.g. shallow, middle, and deep). The Proposal shall be submitted to Baitong Chen [bchen@aqmd.gov]; Nathaniel Dickel [ndickel@aqmd.gov]; Christina Ojeda [cojeda@aqmd.gov] for review. Upon approval by South Coast AQMD, Respondent shall conduct the feasibility assessment. The Reaction Committee shall submit a final report to the South Coast AQMD (to Baitong Chen</p>

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	[bchen@aqmd.gov]; Nathaniel Dickel [ndickel@aqmd.gov]; Christina Ojeda [cojeda@aqmd.gov]) detailing the results of the feasibility study, and recommendations on further deployment of the remote monitoring system not later than 150 days from the approval of the feasibility proposal.
71	Respondent shall submit, by May 21, 2024, a complete permit application for the installation and operation of any aboveground surface landfill gas collection system, or underground landfill gas collection system, installed for the purpose of collecting landfill gas under the geosynthetic cover installed per Condition 31 or the cover as required by the Local Enforcement Agency. 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.
75(f)	By August 29, 2025, the Reaction Committee shall submit a proposal to assess the viability and functionality of adding gas flow rate and composition as monitoring parameters to at least five (5) units installed on the wells listed in this condition. The Proposal shall be submitted to Baitong Chen [bchen@aqmd.gov]; Nathaniel Dickel [ndickel@aqmd.gov]; Christina Ojeda [cojeda@aqmd.gov]. Respondent shall conduct the feasibility assessment. The Reaction Committee shall submit a final report to the South Coast AQMD (to Baitong Chen [bchen@aqmd.gov]; Nathaniel Dickel [ndickel@aqmd.gov]; Christina Ojeda [cojeda@aqmd.gov]) detailing the results of the feasibility study, and recommendations on further deployment of the remote monitoring system not later than 210 days from submittal of the feasibility proposal with a minimum of 3 months of data collection.
83	Respondent shall conduct a study and analysis of specific landfill operational events 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. The study shall consider various landfill operational events which may result in increased release of emissions, including but not limited to, landfill excavations, downtime or decreased operation of any landfill gas collection or control equipment resulting in a reduction of landfill gas flow rate to an instantaneous value of a landfill-wide total of 11,000 scfm, or a reduction of 10% or more of current operational flows, and leachate exposure to atmosphere from spills/seeps/pressurized discharges. The 10% reduction in flow rate shall be determined based on total landfill gas flow rate data trends by comparing the current total landfill gas flow rate, averaged hourly, to the prior week's average landfill gas flow rate and the prior day's average landfill gas flowrate. A 10% reduction in comparison to the weekly or daily average value shall be analyzed as an operational event. The date, time, and duration of the

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	<p>operational events shall be used, in conjunction with meteorological data and air monitoring station data for all compounds monitored using continuous instrumentation, to the extent such data is available, to determine the effects at downwind receptors. This study shall be conducted for a period of 7 months, from June 1, 2024 through December 31, 2024, with a report detailing the landfill operational events, meteorological data, air monitoring station data, general findings of the study, and the landfill gas flow rate trend comparison used to determine a 10% reduction. The report shall be submitted by March 31, 2025 to South Coast AQMD [attn: Baitong Chen, bchen@aqmd.gov; Nathaniel Dickel, ndickel@aqmd.gov; Christina Ojeda, cojeda@aqmd.gov]. The report shall also include a proposed scope for a continuation of the study for up to an additional 6 months, subject to review and approval by SCAQMD. The continuation of the study shall proceed upon written approval by the South Coast AQMD.</p> <p>a. Respondent shall conduct a continued study for a period of 10 months, from January 1, 2025 through October 31, 2025. The continued study shall exclude leachate vapors from the landfill gas flow rate, and add to the list of events to be considered leachate leaks and gas collection and leachate collection/storage system leak testing events. Following the study, Respondent shall prepare a report detailing the landfill operational events, meteorological data, air monitoring station data, general findings of the study, and the landfill gas flow rate trend comparison used to determine a 10% reduction. The analysis of potential air impacts shall consider at minimum the 15 most significant events, in terms of emission potential and air impact potential, for each individual operational event criteria, and shall detail and explain the selection of the events as most significant. The analysis shall also compare and explain impacts at the station or stations most likely to be impacted by the event, considering, emission/event location, wind speed, wind direction, topographical impacts, and any additional factors as needed. The report shall be submitted to South Coast AQMD [attn: Baitong Chen, bchen@aqmd.gov; Nathaniel Dickel, ndickel@aqmd.gov; Christina Ojeda, cojeda@aqmd.gov] by January 30, 2026.</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 and the toe drain termination project:</p> <p>a. Landfill perimeter odor control misters shall be operated along the west slope excavation area and toe drain termination project area while excavation is conducted and while any waste, waste contaminated material, or odiferous material is exposed to atmosphere.</p>

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	<p>b. By September 10, 2024 for the west slope excavation project, and by November 15, 2024 or upon commencement (whichever is later) of the toe drain termination project, 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 activities and excavation activities, if any, related to the toe drain termination project 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 for the west slope excavation project shall be due on September 3, 2024. The first report for the toe drain termination project shall be due on November 19, 2024, and shall also identify:</p> <ul style="list-style-type: none"> <li>i. mitigation measures implemented per Condition No. 42(z), (aa) and/or excavation cessation per Condition No. 42(aa) (as applicable);</li> <li>ii. the corresponding reason for mitigation measures implemented per Condition 42(z) and/or (aa) and/or excavation cessation (as applicable);</li> <li>iii. for excavation cessation and mitigation measures implemented per Condition 42(z) and/or (aa): <ul style="list-style-type: none"> <li>1. the corresponding start and end times of such cessation and mitigation measures (as applicable);</li> <li>2. the associated compound and compound concentration that reached or exceeded the applicable acute REL (as applicable);</li> <li>3. 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</li> <li>4. air monitor(s) which were down and associated wind direction data (as applicable).</li> </ul> </li> </ul>
94	Respondent shall submit, by May 30, 2025, a complete permit application for the additional landfill gas combustion/control unit brought on-site in February 2025. 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.
95	Respondent shall submit, by April 30, 2025, a complete permit modification application for the Landfill Gas Condensate and Leachate Collection/Storage

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	System (under Permit G66132, A/N 613131) to increase the landfill's liquid storage capacity and include the new temporary tank farm located in Canyon D as part of the facility's leachate collection/storage system. 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.
96	By April 30, 2025, update the prior estimates of current and projected landfill gas generation prepared pursuant to Condition No. 70 based on the Landfill ceasing to accept external waste for disposal as of December 31, 2024, including any internal degradable waste disposed of since that date, and submit an updated report on the landfill's current and projected landfill gas generation through the end of calendar year 2029. Landfill gas generation shall be estimated through use of U.S. EPA's LandGEM, and the Reaction Committee's analysis for additional landfill gas generated as a result of the ongoing reaction. The report shall include the items listed in Condition No. 70(a)-(c).
102	Respondent shall submit, by December 31, 2025, a complete permit modification application for the Landfill Gas Condensate and Leachate Collection/Storage System (under Permit G66132, A/N 613131) for the removal of tank farm #9, and relocation, construction, and operation of tanks in tank farm #13 as part of the facility's leachate collection/storage system. The submittal shall be accompanied with a complete Title V Revision application and shall be submitted in accordance with Condition No. 79.
103	Respondent shall submit, by December 31, 2025, a complete permit application for the hazardous and/or non-hazardous liquid treatment system constructed and operating in tank farm #13. The submittal shall be accompanied with a complete Title V Revision application and shall be submitted in accordance with Condition No. 79.