

SOUTH COAST AQMD  
CLERK OF THE BOARDS

2025 APR 11 AM 8:53

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

**In The Matter Of**

SOUTH COAST AIR QUALITY  
MANAGEMENT DISTRICT,

Petitioner,

vs.

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

Respondent.

**Case No. 6177-4**

**COMPLIANCE CHART**

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

Hearing Date: April 16 and 17, 2025

Hearing Time: 9:30 A.M.

Place: Hearing Board  
South Coast Air Quality  
Management District,  
21865 Copley Drive  
Diamond Bar, CA 91765

**COMPLIANCE CHART**

Condition No.	Summary of Requirement(s)	Status	Witness
1, 2	Conduct odor surveillance and maintain records.	Compliance ongoing.	Neal Bolton
3	Expedite the replacement of granular activated carbon media and maintain supply of odor control products.	Compliance ongoing.	Patrick Sullivan
3(a)	Monitor and record landfill gas temperature.	Compliance ongoing.	Patrick Sullivan
4	Maximize landfill gas combustion and prioritize and maximize the use and operation of higher capacity flares.	Compliance ongoing since November 15, 2023 when Flare 3 was put into operation.	Patrick Sullivan
5, 6	Analyze and record monthly sulfur and speciated organic compounds in landfill gas. Maintain stock of colorimetric tubes.	Compliance ongoing; see Section W of Condition 8 reports.	Patrick Sullivan
7	Maintain records of landfill gas flow combusted, landfill gas flow not flared, and sulfur sampling analysis, results, and readings.	Compliance ongoing; see Section B of Condition 8 reports.	Patrick Sullivan
8	Submit monthly written reports containing information on landfill gas and leachate temperature, composition, and flow/quantity; leachate seepage; surface emissions monitoring; treatment of landfill gas and leachate; the landfill gas collection and control system; the	Compliance ongoing; most recently submitted on August 21, 2024, September 20, 2024, October 21, 2024, November 20, 2024, December 20, 2024, January 21, 2025, February 20, 2025, and March 20, 2025.	Patrick Sullivan

Condition No.	Summary of Requirement(s)	Status	Witness
	leachate collection and management system; leachate disposal; landfill and geosynthetic cover; and excavation.		
9	Collect integrated landfill surface samples for analysis across the Reaction Area.	Compliance ongoing; see Section C of Condition 8 reports.	Patrick Sullivan
9(a), (b)	Submit a monthly Reaction Committee determination and supporting evidence regarding the boundaries of the Reaction Area.	Compliance ongoing; most recently submitted on September 6, 2024, October 7, 2024, November 7, 2024, December 10, 2024, January 10, 2025, February 10, 2025, and March 10, 2025.	Robert Dick
10	Conduct instantaneous landfill surface monitoring across the Reaction Area.	Compliance ongoing; see Section C of Condition 8 reports.	Patrick Sullivan
11	Continue operating the flares and landfill gas treatment system and submit deviation reporting.	Compliance ongoing.	Patrick Sullivan
12	Form a Reaction Committee of experts and submit resumes.	Completed; submitted on October 5, 2023; updated on April 5, 2024.	Robert Dick
12(f)	Host a monthly virtual meeting with all members of the Reaction Committee and South Coast AQMD technical staff.	Compliance ongoing; hosted meetings most recently on August 27, 2024, September 26, 2024, October 23, 2024, November 20, 2024, December 18, 2024, January 15, 2025, February 19, 2025, and March 19, 2025.	Robert Dick
12(f)(i)	Submit proposed agenda and presentation materials for Reaction Committee meetings.	Compliance ongoing; most recently submitted on November 8, 2024, December 7, 2024, January 3, 2025, February 7, 2025, and March 7, 2025.	Robert Dick
12(f)(i)	Provide any tables, graphs, or documents prior to each meeting.	Compliance ongoing; most recently submitted on November 20, 2024, December 18, 2024, January 15, 2025, February 14, 2025, and March 17, 2025.	Robert Dick
12(f)(iv)	Post a summary of each Reaction Committee meeting on Chiquita's Odor Mitigation website.	Compliance ongoing; most recently posted on September 16, 2024, October 16, 2024, November 12, 2024, December 10, 2024, January 7, 2025, February 4, 2025, March 11, 2025, and April 8, 2025.	Robert Dick
12(g)(i)	Submit expert report on methods for effective treatment of DMS.	Completed; submitted on April 30, 2024.	Patrick Sullivan
12(g)(ii)	Submit expert report on the cause of the reaction and solutions to slow and stop the reaction(s) in the landfill.	Completed; submitted on December 8, 2023.	Robert Dick

<b>Condition No.</b>	<b>Summary of Requirement(s)</b>	<b>Status</b>	<b>Witness</b>
<b>12(g)(iii)</b>	Submit expert report on the feasibility and availability of a continuous community emission monitoring system for DMS.	Completed; submitted report on December 1, 2023; Reaction Committee submitted recommendation on December 31, 2023.	Patrick Sullivan
<b>12(g)(iv)</b>	Submit expert report on landfill best management practices.	Completed; submitted on November 6, 2023.	Neal Bolton
<b>12(g)(v)</b>	Submit expert report on the known health risks from acute and long-term exposure to DMS.	Completed; submitted on January 15, 2024.	Dr. Pablo Sanchez-Soria
<b>12(g)(vi)</b>	Submit expert report of the health impacts from exposure to specified air pollutants.	Completed; submitted on August 1, 2024.	Dr. Pablo Sanchez-Soria; Dr. Richard Pleus
<b>12(g)(vii)</b>	Develop a model to estimate the rate of liquid generation in the landfill and submit expert report on the results.	Completed; submitted on June 25, 2024.	Neal Bolton
<b>12(g)(vii)</b>	Update the liquid model and submit expert report on the results on a semi-annual basis.	Compliance ongoing; most recently submitted on January 7, 2025.	Neal Bolton
<b>12(g)(viii)</b>	Investigate and submit expert report on landfill gas collection and conveyance piping materials.	Completed; submitted on June 21, 2024.	Srividhya Viswanathan
<b>12(h)</b>	Post all expert reports on Chiquita's Odor Mitigation website.	Compliance ongoing.	Robert Dick
<b>12(i)</b>	Submit expert report on the initial landfill gas flux chamber study; conduct and submit reports on additional studies every 4 months.	Completed; submitted on October 31, 2023, protocols most recently submitted on December 29, 2023 and December 30, 2024; report most recently submitted on January 15, 2025.	Patrick Sullivan
<b>13</b>	Expand the landfill gas well system.	Compliance ongoing.	Srividhya Viswanathan
<b>14</b>	Monitor landfill gas wells monthly for temperature.	Compliance ongoing.	Patrick Sullivan
<b>14(a)</b>	Ensure the operation of the landfill gas collection system equipment does not result in releases of raw landfill gas or condensate into the atmosphere.	Compliance ongoing.	Patrick Sullivan
<b>14(b)</b>	Report any breakdown or malfunction of the landfill gas collection system resulting in emission of raw landfill gas.	Compliance ongoing.	Patrick Sullivan
<b>15, 15(a), 15(b)</b>	Design and install vertical dual extraction wells to the desired depths at the required densities in the initial Reaction Area; complete Rule 1150.1 corrective action requirements.	Compliance ongoing; see Section M of Condition 8 reports; notified of the number of wells added by October 31, 2023; submitted the design and installation schedule for 70 additional wells, which	Srividhya Viswanathan

Condition No.	Summary of Requirement(s)	Status	Witness
		have since been installed, on January 31, 2024.	
<b>15(c), 15(d)</b>	Notify of well installation at least 1 week in advance.	Compliance ongoing while installing wells pursuant to Conditions 15(a) and (b); submitted weekly each Friday.	Srividhya Viswanathan
<b>15(e), (f), (g), (h), (i)</b>	Implement additional specified measures to reduce potential emissions during well drilling.	Compliance ongoing while drilling wells.	Srividhya Viswanathan
<b>15(j)</b>	Replace damaged, blocked, pinched, or elevated temperature wells in the Reaction Area.	Following the installation of additional wells pursuant to Conditions 15(a) and 15(b).	Srividhya Viswanathan
<b>15(k)</b>	Keep oxygen below 5 percent in interior wells.	Once additional/adequate gas extraction capacity is installed.	Patrick Sullivan
<b>15(l)</b>	Install well boots seals on all wells in the Reaction Area.	Completed.	Srividhya Viswanathan
<b>15(m)</b>	Submit semi-annual as-built drawings.	Compliance ongoing; submitted weekly each Wednesday.	Srividhya Viswanathan
<b>15(n)</b>	All new vertical extraction wells must be dual extraction wells; install dewatering infrastructure.	Compliance ongoing.	Srividhya Viswanathan
<b>15(o)</b>	Determine monthly whether any wells in the Reaction Area can be drilled deeper.	Compliance ongoing; see Section M of Condition 8 reports.	Srividhya Viswanathan
<b>16</b>	Submit a permit modification application to increase the number of wells.	Completed; submitted by October 6, 2023.	Patrick Sullivan
<b>17, 17(a)</b>	Install dewatering sumps/pumps in at least 60% of the vertical wells that are capable of extracting liquids in the Reaction Area; provide updates in the monthly Condition 8 reports.	Completed; see Section I of the April 22, 2024 Condition 8 report for detailed rationale and reasoning why installation of pumps in at least 60% of the wells in the Reaction Area by March 15, 2024 was infeasible.	Srividhya Viswanathan
<b>18</b>	Submit Reaction Area dewatering guidelines and implementation procedures.	Submittals completed; submitted on December 5, 2023; revised on April 4, 2024; further revised on June 7, 2024; compliance ongoing.	Srividhya Viswanathan
<b>19</b>	Submit a permit modification application to increase the landfill's liquid storage capacity.	Completed; submitted on October 4, 2023.	Patrick Sullivan
<b>20</b>	Increase landfill gas control capacity.	Compliance ongoing; Flare 3 was installed and in operation by November 15, 2023; notification submitted by November 17, 2023.	Patrick Sullivan
<b>21</b>	Submit a permit application for the new construction of Flare 4.	Complete; submitted on October 30, 2023.	Patrick Sullivan
<b>22</b>	Continue to use one or multiple portable thermal oxidizer(s) until the Reaction Committee concludes they are no longer needed.	Compliance ongoing; notification re Envent TOX submitted on February 15, 2024; determination	Patrick Sullivan

Condition No.	Summary of Requirement(s)	Status	Witness
		re additional TOX submitted on March 3, 2025.	
23	Continue to use one or both flares as necessary until Flare 5 is permitted and operational.	Compliance ongoing.	Patrick Sullivan
24	Prevent standing, pooling, or ponding leachate, collect leachate or repair tanks to minimize emissions.	Compliance ongoing.	Neal Bolton
25	Mitigate odors and exposure of leachate into the atmosphere during discharges of pressurized leachate.	Compliance ongoing.	Neal Bolton
26	Investigate and submit report on the feasibility of temporary containment measures for leachate.	Completed; submitted on March 12, 2024.	Neal Bolton
27(a)	Measure and record leachate temperatures within pipes.	Compliance ongoing; see Section Q of Condition 8 reports.	Srividhya Viswanathan
27(b)	Conduct leachate seep inspections twice each calendar day and maintain records.	Compliance ongoing.	Neal Bolton
27(c)	Submit leachate inspection logs.	Compliance ongoing; submitted weekly each Tuesday; see also Section Q of Condition 8 reports.	Neal Bolton
27(d)	Record quantities of leachate sent off-site and treated on-site.	Compliance ongoing; see Section Q of Condition 8 reports.	Srividhya Viswanathan
27(e)	Report leachate leaks or spills separately from leachate seeps.	Compliance ongoing.	Neal Bolton
27(f)	Develop and implement SOPs for leachate tank operations; conduct daily inspections of leachate tank equipment.	Completed; submitted on September 23, 2024; revised on October 14, 2024 (resubmitted on October 18, 2024); compliance ongoing.	Neal Bolton
27(g)	Do not overfill leachate tanks.	Compliance ongoing.	Neal Bolton
28	Maintain equipment with materials capable of handling gases and liquids at elevated temperatures.	Compliance ongoing.	Srividhya Viswanathan
29	Ensure capacity to accumulate onsite and/or dispose of leachate offsite.	Compliance ongoing; see Section R of Condition 8 reports.	Srividhya Viswanathan
29	Comply with Leachate Management Plan.	Compliance ongoing.	Neal Bolton
30	Visually inspect and repair covers.	Compliance ongoing.	Neal Bolton
31	Install a geosynthetic cover over portions of the landfill.	Completed; design submitted on September 12, 2023; progress update submitted on October 31, 2023; additional updates included in Section L of Condition 8 reports.	Neal Bolton
32, 32(a)	Assess and submit an expert report on odor and emissions transport.	Completed; submitted on December 1, 2023.	Neal Bolton
32(b)	Submit a proposal for an additional air modeling study.	Completed; submitted on January 15, 2024.	Neal Bolton

<b>Condition No.</b>	<b>Summary of Requirement(s)</b>	<b>Status</b>	<b>Witness</b>
<b>32(b)(ii), 32(c)</b>	Revise and resubmit the air modeling study proposal.	Completed; submitted on May 8, 2024; further revised on May 16, 2024.	Neal Bolton
<b>32(c)</b>	Submit an expert report on the additional modeling.	Completed; submitted on September 2, 2024.	Neal Bolton
<b>33</b>	Expand and enhance the community air monitoring program.	Compliance ongoing.	Patrick Sullivan
<b>34, 34(a), 34(b)</b>	Provide access to and post on Chiquita's website real-time continuous and integrated canister monitoring data.	Compliance ongoing.	Patrick Sullivan
<b>34(c)</b>	Develop, install, and operate a system that provides email notifications for exceedances of specified air pollutants.	Completed; retained CTEH by April 30, 2024; developed by May 30, 2024; implemented by September 23, 2024.	Dr. Pablo Sanchez-Soria
<b>35</b>	Provide SOPs and Quality Control/Quality Assurance documents for the air monitoring stations.	Compliance ongoing; initially submitted by January 19, 2024; see Section S of Condition 8 reports for updates.	Patrick Sullivan
<b>35(a)</b>	Provide access to on-site and off-site monitoring equipment; provide a list of appropriate PPE.	Compliance ongoing.	Patrick Sullivan
<b>35(b)</b>	Implement specified quality control measures concerning monitoring equipment.	Compliance ongoing.	Patrick Sullivan
<b>36, 36(a)</b>	Install and maintain two MicroGC air monitoring stations and make data available on Chiquita's website.	Compliance ongoing; installation completed by May 1, 2024; monitoring plan submitted on April 29, 2024.	Patrick Sullivan
<b>36(b)</b>	Increase 24-hour sampling and analysis until the MicroGCs are installed.	Completed.	Patrick Sullivan
<b>36(c)</b>	Upgrade MicroGCs to measure acrolein.	In progress.	Patrick Sullivan
<b>37</b>	Take and analyze ten leachate samples from wells with pumps in the Reaction Area and submit the results.	Completed; sampled by March 5, 2024; submitted laboratory results on March 15, 2024.	Srividhya Viswanathan
<b>38</b>	Take and analyze representative monthly samples of leachate and submit the results.	Compliance ongoing; most recently submitted on November 13, 2024, December 10, 2024, January 10, 2025, February 7, 2025, March 7, 2025, and April 8, 2025.	Srividhya Viswanathan
<b>39</b>	Maintain and regularly update Chiquita's Odor Mitigation webpage.	Compliance ongoing.	Robert Dick
<b>40</b>	Host a monthly public one-hour community meeting as specified.	Compliance ongoing; most recently held on August 8, 2024, September 12, 2024, October 10, 2024, November 7, 2024, December 12, 2024, January 9,	Robert Dick

Condition No.	Summary of Requirement(s)	Status	Witness
		2025, February 6, 2025, and March 6, 2025.	
41	Submit an application for a Rule 1150 Landfill Excavation Plan.	Completed; submitted on January 30, 2024.	Patrick Sullivan
42	Comply with enumerated list of requirements for all Rule 1150(a)(5) excavation.	Compliance ongoing pending approval of Rule 1150 Landfill Excavation Plan.	Neal Bolton & Patrick Sullivan
43	Minimize working face and maintain fresh trash-related odor mitigation measures.	No longer applicable since there are no longer active operations.	Neal Bolton
44	Obtain, install, and maintain an on-site meteorological station.	Compliance ongoing; installation completed by October 31, 2023.	Patrick Sullivan
45, 46, 47	Install and operate Semi-Permanent Vapor Odor Control in the Reaction Area and a perimeter odor control misting system.	Compliance ongoing; installation completed by September 20, 2023.	Neal Bolton
48	Notify of any substantial operational changes to reduce odors.	Compliance ongoing.	Neal Bolton
50	Implement the EPA's Master Work Plan under the Unilateral Administrative Order.	Compliance ongoing.	Robert Dick
51	Permit South Coast AQMD inspections deemed necessary by compliance staff.	Compliance ongoing.	Neal Bolton
51	Submit updates to the Health and Safety Plan.	Compliance ongoing.	Neal Bolton
51(a)	Maintain two 5-gas monitors onsite.	Compliance ongoing.	Neal Bolton
52	Host a biweekly virtual meeting.	Compliance ongoing.	Patrick Sullivan
53	Submit weekly reports on leachate tanks, liquid collected and treated, and seeping, pooling, or ponding leachate collected.	Compliance ongoing; submitted weekly each Wednesday.	Srividhya Viswanathan
54	Collect, convey, and store condensate collected after the sulfur treatment.	Compliance ongoing.	Patrick Sullivan
55	Cease injection of condensate into the flares, unless specified conditions are met.	Compliance ongoing.	Patrick Sullivan
56	Conduct sampling and analysis of leachate tank headspace vapors in Tank Farm 9.	Completed; sampling conducted by April 4, 2024; report submitted on April 18, 2024; revised on April 24, 2024.	Patrick Sullivan
57	Submit a permit modification application to increase liquid storage capacity.	Completed; submitted by April 22, 2024.	Patrick Sullivan
58	Submit a permit application for the operation of the thermal oxidizer.	Completed; submitted by June 21, 2024.	Patrick Sullivan
59	Submit a permit application for treating hazardous liquid waste.	Completed; submitted by June 21, 2024.	Patrick Sullivan
60	Submit a permit modification application to include the tie-in of vapor vent lines.	Completed; submitted by April 22, 2024.	Patrick Sullivan

Condition No.	Summary of Requirement(s)	Status	Witness
<b>61, 62</b>	Submit permit modification applications to include the combustion of leachate vapor.	Completed; submitted by May 21, 2024.	Patrick Sullivan
<b>63</b>	Submit a schematic of the leachate treatment and storage system.	Completed; submitted by April 22, 2024.	Srividhya Viswanathan
<b>64</b>	Prepare and submit Leachate Management Plan to EPA; submit final plan and any updates to South Coast AQMD.	Completed; submitted on March 28, 2024; most recently updated and submitted on January 11, 2025.	Neal Bolton
<b>65</b>	Provide weekly summaries of leachate dewatering pump installation activities.	Compliance ongoing; submitted weekly each Friday.	Srividhya Viswanathan
<b>66</b>	Monitor for temperature and pressure at wells within the Reaction Area.	Compliance ongoing.	Robert Dick
<b>66(a) [Old 66]</b>	Investigate a remote monitoring system (RMS) for well pressure and landfill gas temperature at well head.	Completed; submitted by April 19, 2024.	Robert Dick
<b>[Old 66]</b>	Finalize contracts to install and operate the RMS.	Completed; contract finalized by June 21, 2024.	Robert Dick
<b>66(a), 66(a)(i), 66(a)(ii)</b>	Finalize contract to install and operate the RMS, and submit the finalized contract and specified information.	Completed; contract finalized and all required information submitted by September 17, 2024.	Robert Dick
<b>66(a)(iii), 66(a)(iv)</b>	Contact vendors requesting recommendations for each of the RMS identified issues/concerns; submit findings.	Completed; correspondence submitted by October 11, 2024; findings submitted by October 30, 2024.	Robert Dick
<b>66(a)(v)</b>	Determine and submit the location for installation of an RMS; install and operate system.	Completed; determination submitted by October 15, 2024; installed and in operation by December 31, 2024.	Robert Dick
<b>66(a)(vi)</b>	Submit a proposal to assess the viability and functionality of an RMS for temperature and pressure within a well with a pump located within the Reaction Area; conduct feasibility assessment and submit results and recommendations.	Completed; proposal submitted on January 31, 2025.	Robert Dick
<b>67</b>	Designate an Inspection Liaison.	Completed.	Robert Dick
<b>68</b>	Install differential pressure gauges on each leachate storage tank; monitor and record daily pressure readings.	Completed; installed by July 10, 2024; compliance ongoing; see Section V of Condition 8 reports.	Srividhya Viswanathan
<b>69</b>	Conduct quarterly inspections and monitoring of the landfill's piping network and submit frequency recommendations.	Compliance ongoing; most recently completed by January 19, 2025.	Patrick Sullivan
<b>70</b>	Submit an expert report on the landfill's current and projected landfill gas generation.	Completed; submitted on June 28, 2024.	Patrick Sullivan
<b>70(a)</b>	Submit a permit application for the new construction of Flare 5.	Completed; submitted by October 31, 2024.	Patrick Sullivan



Condition No.	Summary of Requirement(s)	Status	Witness
71	Submit a permit application for the LFG collection system under the geosynthetic cover.	Completed; submitted by May 21, 2024.	Patrick Sullivan
72(a)	At least quarterly, sample and analyze the vapor flow in the leachate piping.	Compliance ongoing; see Section V of Condition 8 reports.	Patrick Sullivan
72(b)	Submit a source test protocol for the testing of the vapor flow in the leachate piping and conduct testing. Submit the final results in a source test report format.	Completed; submitted by May 17, 2024; revised on July 12, 2024; testing completed by October 17, 2024 and in March 2025; report submitted by December 13, 2024.	Patrick Sullivan
72(c)	Submit Reaction Committee recommendation on additional vapor flow testing.	Completed; submitted by December 13, 2024.	Patrick Sullivan
72(d)	Until the pressure gauges are installed, conduct pressure testing and monitoring within the HDPE header(s).	Completed.	Srividhya Viswanathan
72(e)	Install flow meters within the HDPE piping headers and submit daily flow rate.	Compliance ongoing; installed by July 19, 2024; see Section V of Condition 8 reports.	Patrick Sullivan
73	Submit an inventory of all internal combustion engine equipment rated greater than 50 HP brought onsite.	Compliance ongoing; submitted inventory on May 21, 2024; submitted initial permit application on June 30, 2024.	Patrick Sullivan
74	Expedite the procurement of the equipment needed to construct Flare 4 and provide updates.	In process; see Section X of Condition 8 reports.	Patrick Sullivan
76	Install and utilize sample ports on all equipment that requires sampling.	Compliance ongoing; initially installed by December 2, 2024.	Patrick Sullivan
78	Install a 60-mil liner under the leachate tanks and inspect it at least twice-daily; record inspection and maintenance records.	Under discussion with South Coast AQMD.	Vidhya Viswanathan & Neal Bolton
79	Always request expedited processing/review.	Compliance ongoing.	Patrick Sullivan
80	Notify of and log permitted Various Location or CARB Statewide PERP equipment.	Compliance ongoing; see Section Y of Condition 8 reports.	Patrick Sullivan
81, 82	Notify of LFG equipment downtime.	Compliance ongoing.	Patrick Sullivan
81(c)	Develop, install, and operate a system allowing members of the public to sign-up for downtime notifications.	Completed; development by November 18, 2024; deployment by December 10, 2024.	Patrick Sullivan
83	Submit an expert report on specific landfill operational events and potential air impacts.	Completed; submitted by March 31, 2025.	Patrick Sullivan
84	Submit an expert report evaluating the installation of windbreaks and/or wind flow disrupters along the western and	Completed; submitted by November 15, 2024.	Neal Bolton

Condition No.	Summary of Requirement(s)	Status	Witness
	northern borders of the facility, and/or ridgeline.		
85	Operate additional odor control equipment and submit reports while conducting the west slope excavation project and the toe drain termination project.	Completed.	Neal Bolton
86, 86(a)	Comply with additional specified operational requirements until final approval of leachate equipment permits.	Compliance ongoing; installed sampling ports by November 1, 2024.	Srividhya Viswanathan
87	Do not conduct planned downtime for 3 or more flares/TOXs at any one time unless the work is exempted or the downtime is otherwise approved.	Compliance ongoing.	Patrick Sullivan
88	Prevent unplanned downtime to maximum extent feasible.	Compliance ongoing.	Patrick Sullivan
88(a)	Complete the connection of the flare station to permanent grid power.	Completed.	Patrick Sullivan
88(b)	Once the flare station is connected to permanent grid power, maintain the existing generators as backup power for the flare station.	Compliance ongoing.	Patrick Sullivan
88(b)	Install backup power at the Zeeco TOX.	Completed.	Patrick Sullivan
88(b)	Minimize downtime as a result of power failure.	Compliance ongoing.	Patrick Sullivan
89	Comply with additional specified requirements for equipment subject to permit applications until final permit approval.	Compliance ongoing.	Srividhya Viswanathan
90	Submit a permit modification application to increase the landfill's liquid storage capacity.	Under discussion with South Coast AQMD	Patrick Sullivan
91	Submit a permit application for each leachate treatment system.	Under discussion with South Coast AQMD.	Patrick Sullivan
92	Submit files larger than 35 MB via a shared link.	Compliance ongoing.	Robert Dick