

**South Coast AQMD v. Chiquita Canyon, LLC (Case No. 6177-4):
December 2025 Stipulated Proposed Modifications**

Condition	Stipulated Language																										
1(b)	<p>Respondent, or Respondent's contractor, as applicable, shall conduct an odor surveillance at each of the following Surveillance Locations:</p> <table border="1"> <thead> <tr> <th>Stop</th><th>Description</th></tr> </thead> <tbody> <tr> <td>1.</td><td>Intersection of Chiquito Canyon Road and driveway leading to the LA County Fire's Del Valle Regional Training Center</td></tr> <tr> <td>2.</td><td>Intersection of Chiquito Canyon Road and Lincoln Avenue</td></tr> <tr> <td>3.</td><td>Intersection of Lincoln Avenue and Jackson Street</td></tr> <tr> <td>4.</td><td>Intersection of Lincoln Avenue and Harding Avenue</td></tr> <tr> <td>5.</td><td>Intersection of Buchanan Way and Chiquito Canyon Road</td></tr> <tr> <td>6.</td><td>Intersection of Chiquito Canyon Road and San Martinez Road</td></tr> <tr> <td>7.</td><td>Intersection of San Martinez Road and Morningside Drive</td></tr> <tr> <td>8.</td><td>Intersection of Lexington Drive and Morningside Drive</td></tr> <tr> <td>9.</td><td>Intersection of Val Verde Road and Trellis Road</td></tr> <tr> <td>10.</td><td>Intersection of San Martinez Road and Euclid Ave.</td></tr> <tr> <td>11.</td><td>Intersection of San Martinez Road and Kennington Road</td></tr> <tr> <td>12.</td><td>Intersection of Hunstock Street and Windsor Road</td></tr> </tbody> </table>	Stop	Description	1.	Intersection of Chiquito Canyon Road and driveway leading to the LA County Fire's Del Valle Regional Training Center	2.	Intersection of Chiquito Canyon Road and Lincoln Avenue	3.	Intersection of Lincoln Avenue and Jackson Street	4.	Intersection of Lincoln Avenue and Harding Avenue	5.	Intersection of Buchanan Way and Chiquito Canyon Road	6.	Intersection of Chiquito Canyon Road and San Martinez Road	7.	Intersection of San Martinez Road and Morningside Drive	8.	Intersection of Lexington Drive and Morningside Drive	9.	Intersection of Val Verde Road and Trellis Road	10.	Intersection of San Martinez Road and Euclid Ave.	11.	Intersection of San Martinez Road and Kennington Road	12.	Intersection of Hunstock Street and Windsor Road
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South Coast AQMD v. Chiquita Canyon, LLC (Case 6177-4)

**South Coast AQMD v. Chiquita Canyon, LLC (Case No. 6177-4):
December 2025 Stipulated Proposed Modifications**

Condition	Stipulated Language		
		13	Intersection of Del Valle Road and Silver Street
		14	Intersection of Del Valle Road and Hasley Canyon Road
		15	Intersection of Hasley Canyon Road and Gibraltar Lane
		16	Intersection of Gibraltar Lane and Alton Way
		17	Intersection of Gibraltar Lane and Springvale Lane
		18	Intersection of Castlebury Place and Picadilly Place
		19	Intersection of Gibraltar Lane and Cambridge Avenue
		20	Intersection of Cambridge Avenue and Hasley Canyon Road
		21	Intersection of Creekbed Road and Firebrand Drive
		22	Intersection of The Old Road and Hillcrest Parkway
		23	Intersection of Hillcrest Parkway and Park Vista Drive at Castaic Elementary School
		24	Intersection of Hasley Canyon Road and Commerce Center Drive (Santa Clarita Valley International School & PlayMakers Preschool)

**South Coast AQMD v. Chiquita Canyon, LLC (Case No. 6177-4):
December 2025 Stipulated Proposed Modifications**

Condition	Stipulated Language		
		25	Intersection of The Old Road and Live Oak Road
		26	Intersection of Live Oak Road and Hidden Trail Road
		27	Intersection of Rangewood Road and Buckskin Drive
		28	Intersection of Live Oak Elementary School at Saddleridge Way
		29	Intersection of Quincy Street and Cambridge Avenue
		30	Intersection of Commerce Center Drive and Witherspoon Parkway
		31	Intersection of Franklin Parkway and driveway leading to the United States Postal Service
		32	Intersection of Henry Mayo Drive and Cambridge View Drive, leading into the Valencia Travel Village RV Resort
		33	Intersection of Valencia Boulevard at West Ranch High School
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		37	Intersection of Hasley Canyon Road and Valley Glen Street

**South Coast AQMD v. Chiquita Canyon, LLC (Case No. 6177-4):
December 2025 Stipulated Proposed Modifications**

Condition	Stipulated Language		
		38	Intersection of Hasley Canyon Road and Sloan Canyon Road
		39	Intersection of Sloan Canyon Road and Hillcrest Parkway
		40	Intersection of Hillcrest Parkway and The Old Road
		41	Intersection of Hillcrest Parkway at Castaic Middle School
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8(q)	<p>Updates regarding leachate including:</p> <ul style="list-style-type: none"> i. Leachate temperature recordings pursuant to Condition No. 27(a); ii. Daily log of inspection findings and containment activities pursuant to Condition 27(b); iii. Weekly record of leachate seepage and pooling pursuant to Condition 27(c); iv. Quantity of leachate measured, and associated company name and physical address of the off-site disposal/treatment facility(ies) that receive leachate generated by the landfill, pursuant to Condition 27(d); v. A list of all hazardous and non-hazardous liquid storage and treatment facilities that have been contacted and current status of each facility including available, contracted, and utilized capacity to receive hazardous and non-hazardous landfill liquids; and vi. An update regarding the number of tanks in each leachate tank group; the total number of leachate tanks treated; the monthly and year-to-date total quantity of liquid collected; the monthly and year-to-date total quantity of liquid treated; and the monthly and year-to-date total quantity of seeping, pooling, or ponding leachate collected. 		
27(f)(i)	Respondent shall revise the SOPs developed under Condition No. 27(f) to include instructions for leachate tanker truck operations, as applicable to the leachate tank farms installed on site, in accordance with industry standards		

**South Coast AQMD v. Chiquita Canyon, LLC (Case No. 6177-4):
December 2025 Stipulated Proposed Modifications**

Condition	Stipulated Language
	and best management practices. The goal of these revisions shall be to prevent leachate overflow, leaks, spillage, equipment failure, operator error, and to prevent and minimize any other exposure of leachate and leachate vapors to atmosphere in and around the tank farm areas. The revised SOPs shall be submitted to South Coast AQMD for review and approval [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 January 9, 2026, unless otherwise approved in writing by South Coast AQMD. The revised SOPs shall be implemented upon submission. Should South Coast AQMD provide any comment(s) on these revised SOPs or any subsequent revised SOPs, Respondent shall incorporate South Coast AQMD comments and submit further revised SOPs, or shall provide detailed justification for not incorporating comments, to South Coast AQMD within 15 days of receipt of the comments.
27(f)(ii)	Respondent shall review and revise the SOPs as needed, but at least every 6 months, according to any changes in leachate tank operations, and with consideration of root cause analyses for spills and/or leaks under Condition No. 27(e)(5), with consideration for corrective actions implemented or to be implemented under Condition No. 27(e)(8), and with consideration of any South Coast AQMD comments. Revised SOPs shall be submitted to South Coast AQMD for review and approval at least every 6 months, and shall include redlined and clean versions. Revised SOPs shall be implemented upon submission. Should South Coast AQMD provide any comments on these revised SOPs or any subsequent revised SOPs, Respondent shall respond and/or provide further revised SOPs to South Coast AQMD within 15 days of receipt of the comments.
34(c)	Respondent shall, by April 30, 2024, retain a third party to develop and install a system that provides automatic electronic notification via email for any exceedance of the applicable 1-hour NAAQS, CAAQS, or acute 1-hour OEHHA REL, whichever is lower (both in time and concentration) based on a time weighted average for benzene and H2S monitored in real-time by Respondent's monitoring network within the surrounding community (MS-06 through MS-12) by May 30, 2024. Additionally, by September 23, 2024, Respondent, through its retained contractor, shall develop and install a system allowing identical electronic notification via email for any exceedance of the applicable 1-hour NAAQS, CAAQS, or acute 1-hour OEHHA REL, whichever is lower (both in time and concentration) based on a time weighted average for benzene and H2S monitored in real-time by Respondent's monitoring network surrounding the Landfill (MS-01 through MS-05). Such systems shall also provide an automatic electronic notification once the applicable time weighted average falls below the applicable REL. By December 31, 2025, the third party shall revise the system to provide an automatic electronic notification every hour during which the applicable time weighted average continues to be above the applicable REL. The template for all notifications

South Coast AQMD v. Chiquita Canyon, LLC (Case 6177-4)

**South Coast AQMD v. Chiquita Canyon, LLC (Case No. 6177-4):
December 2025 Stipulated Proposed Modifications**

Condition	Stipulated Language
	shall be written in coordination with and approved by South Coast AQMD. Respondent shall be responsible for the third party including in such system a method for members of the public to sign up to receive such notifications without any personally identifying information (including email address) being disclosed to Respondent. Respondent shall be responsible for the third party putting into effect the notification system within three business days of direction from South Coast AQMD.
34(c)(i)	By December 31, 2025, Respondent shall retain a third party to develop a system that allows for the electronic notifications defined in Condition 34(c) to be distributed via text message. Respondent shall be responsible for the third party including in such system a method for members of the public to sign up to receive such notifications without any personally identifying information (including phone numbers) being disclosed to Respondent. Respondent shall be responsible for the third party putting into effect the notification system within three business days of direction from South Coast AQMD.
34(d)	Respondent shall investigate any measurement which results in an exceedance notification being distributed as defined in Condition 34. The investigation should include a review of meteorological conditions in the area near the exceedance event, review of monitors downwind of the exceedance event, review of landfill activity that may have contributed to the exceedance event (e.g. nearby construction, traffic, cracks in soil, tears in liner, flare downtime, etc.), review of recent activity at the monitoring site for any correlation with the exceedance measurement, review of other environmental factors that may have impacted the measurement, and review of any instrument data and data validation/invalidation recommendation(s) provided by the instrument vendor. Within one business day, Respondent shall submit to South Coast AQMD [attn: Stephen Dutz, sdutz@aqmd.gov ; Kathryn Roberts, kroberts@aqmd.gov ; Mary Reichert, mreichert@aqmd.gov] a preliminary report of its investigation and findings. Full documentation of the above investigation shall be submitted to South Coast AQMD [attn: Stephen Dutz, sdutz@aqmd.gov ; Kathryn Roberts, kroberts@aqmd.gov ; Mary Reichert, mreichert@aqmd.gov] within four business days, noting any remediation activity or corrective action that took place, along with recurrence minimization if the measurement is found to be invalid.
34(e)	By December 31, 2025, Respondent shall retain sufficient third-party support to ensure that all CH ₄ , H ₂ S, PM, and meteorological sensors meet data quality objectives identified by the instrument vendor or outlined in the standard operating procedures or quality assurance documentation; and are maintained, calibrated, and replaced in accordance with the instruments' standard operating procedures or quality assurance documentation. For any measurement that results in an exceedance notification being distributed as defined in Condition No. 34, the

**South Coast AQMD v. Chiquita Canyon, LLC (Case No. 6177-4):
December 2025 Stipulated Proposed Modifications**

Condition	Stipulated Language
	entity/ies must also provide instrument data and a data validation/invalidation recommendation to Respondent sufficient for Respondent to meet the time frames allotted by Condition 34(d) above.
34(f)	By December 31, 2025, Respondent shall retain sufficient third-party support to ensure that all microGC instruments meet data quality objectives identified by the instrument vendor or outlined in the standard operating procedures or quality assurance documentation; and are maintained, calibrated, and replaced in accordance with the instruments' standard operating procedures or quality assurance documentation. For any measurement that results in an exceedance notification being distributed as defined in Condition No. 34, the entity/ies must also provide instrument data and a data validation/invalidation recommendation to Respondent sufficient to meet the time frames required by Condition 34(d).
36(d)	Respondent shall promptly (by March 31, 2026, unless otherwise approved in writing by South Coast AQMD) procure an additional microGC instrument package and two additional sensor modules to be used as spares. The instrument should be maintained in operational condition and be available for immediate deployment once determined that a monitoring network instrument has failed.
53	Respondent shall, on a monthly basis, report on the: (1) number of tanks in each leachate tank group; (2) total number of leachate tanks treated; (3) monthly and year-to-date total quantity of liquid collected; (4) monthly and year-to-date total quantity of liquid treated; and (5) estimated monthly and year-to-date total quantity of seeping, pooling, or ponding leachate collected. By no later than April 3, 2024, Respondent shall submit 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 first report, and shall report this information in monthly reports pursuant to Condition No. 8(q)(vi).
63	By December 16, 2025, Respondent shall provide South Coast AQMD with a schematic of the current leachate treatment system and leachate storage system, including but not limited to connections, flow lines, treatment vessels, tanks and tank groups, vent lines to control equipment, lines to and between leachate tanks, tanks which are connected and not connected to vacuum vent lines, and the leachate tanker truck loading/unloading equipment.
77	Respondent shall conduct aerial surveillance over the entire landfill surface on a monthly basis, and over the Reaction Area defined in Condition 9(a) on a weekly basis, employing a drone equipped with sensors with a minimum detection level of 1 ppmv methane, and in accordance with OTM-51. If an aerial surveillance reading reaches or exceeds 200 ppmv methane, Respondent shall conduct follow-up ground-based surface emission monitoring field inspections according to the procedures of OTM-51 and U.S. EPA Method 21, unless Respondent is unable to monitor the subject locations due to inaccessibility or dangerous conditions for a technician. The

South Coast AQMD v. Chiquita Canyon, LLC (Case 6177-4)

**South Coast AQMD v. Chiquita Canyon, LLC (Case No. 6177-4):
December 2025 Stipulated Proposed Modifications**

Condition	Stipulated Language
	<p>follow-up field inspection shall be performed within 2 hours of becoming aware of aerial surveillance exceedances. If an exceedance of 500 ppmv methane is found or confirmed during the follow-up inspection, Respondent shall implement corrective actions within 2 calendar days, including but not limited to, geosynthetic cover maintenance or repair, landfill cover maintenance or repair, wellfield vacuum adjustments, and piping/gas component maintenance or repair. Respondent shall develop 1) a color-coordinated geospatial interpolated methane map displaying the absolute value results of the methane readings, 2) a color-coordinated geospatial interpolated methane map displaying the change in methane readings as compared to the prior aerial surveillance, 3) a map displaying geolocated coordinates with local methane peaks and ground-based follow-up peak verification, and 4) a map displaying the drone flight path. The local methane peak map (map #3) shall include a color legend to differentiate locations displaying methane readings of 1) < 200 ppmv, 2) ≥ 200 and < 500 ppmv, 3) ≥ 500 and < 1,000 ppmv, 4) ≥ 1,000 and < 2,000 ppmv, 5) ≥ 2,000 and < 5,000 ppmv, and 6) ≥ 5000 ppmv, or as otherwise approved in writing by South Coast AQMD. The interpolated maps displaying the absolute value (map #1) and change in methane readings (map #2) shall include a color legend to differentiate the magnitude of the reading, as determined by Respondent, or as otherwise requested by South Coast AQMD. The maps, follow-up field inspection measurements and locations with associated dates/times, causes of exceedances (500 ppmv methane or greater), any corrective actions performed, and documentation (date, time, reasoning) of field inspections not performed due to inaccessibility or dangerous conditions shall be provided in the subsequent monthly report pursuant to Condition 8(c). Raw data used to create any of the above documents shall be provided to South Coast AQMD within 5 working days of request.</p>
83(a)	<p>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</p>

**South Coast AQMD v. Chiquita Canyon, LLC (Case No. 6177-4):
December 2025 Stipulated Proposed Modifications**

Condition	Stipulated Language
	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.
90	Within 30 days, or earlier, of the Department of Toxic Substances Control's (DTSC) final approval of the written workplan for the permanent relocated tank farm, Respondent shall submit to South Coast AQMD a complete permit modification application to the Landfill Gas Condensate and Leachate Collection/Storage System (under Permit G66132, A/N 613131). The application shall include the revised tank location(s), revised number of tanks/storage capacity, and the updated site-wide configuration of the 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.
91	Within 30 days, or earlier, of DTSC's final approval of the written workplan for the permanent relocated tank farm, Respondent shall submit to South Coast AQMD a complete permit application for each hazardous and non-hazardous liquid treatment system. The submittal shall be accompanied with a complete Title V Revision application and shall be submitted with an expedited permit processing request with associated required fees, forms, and shall include, but not limited to, the applicable information listed in South Coast AQMD Reg. II and below:
New Condition #1 (98)	<p>Respondent shall, not later than October 30, 2026 unless otherwise approved in writing by South Coast AQMD, install a passive liquid and vapor collection receptacle onto all air release valves installed on the leachate/condensate collection and conveyance piping and any other valves installed on the subject piping where liquids or vapors may be exposed/released to atmosphere, excluding any emergency pressure/vacuum relief valves.</p> <p>a. Such receptacles shall be designed and installed to ensure that they are maintained in an airtight condition. All vapors from the receptacles shall be vented and conveyed to the landfill gas collection system. All collected liquids shall be conveyed to the leachate/condensate collection system. The liquids from the receptacle shall not be routed to the landfill gas collection system.</p> <p>b. Respondent shall prioritize liquid and vapor collection receptacles installation on air release valves on liquid collection/conveyance lines which move characteristically hazardous liquids.</p> <p>c. Any air release valve that does not have a fully installed and operational liquid and vapor collection receptacle per Condition 98(a) above shall not be opened for any reason unless otherwise approved in writing by South Coast AQMD.</p>

South Coast AQMD v. Chiquita Canyon, LLC (Case 6177-4)

**South Coast AQMD v. Chiquita Canyon, LLC (Case No. 6177-4):
December 2025 Stipulated Proposed Modifications**

Condition	Stipulated Language
	d. Respondent shall inspect the valves, and associated liquid and vapor collection receptacles at least once every 14 days. Inspections shall include observations (visual, audible, tactile, odor, etc.) to determine any liquid or vapor leaks. Inspections shall also include monitoring of connection points or joints using a PID as specified in Condition 86(e)(i). All leaks detected shall be repaired consistent with the schedule listed in Condition 86(e)(ii). Respondent shall maintain records for these inspections, consistent with the requirements listed in Condition 86(e)(iii).
New Condition #2 (99)	By December 21, 2025, all liquid/leachate transfers from stationary leachate storage tanks into leachate tanker trucks, or from leachate tanker trucks into stationary leachate storage tanks, shall be performed via bottom loading of leachate into the leachate tanker truck or stationary storage tank to the maximum extent feasible. By March 16, 2026, not less than 50% of all liquid/leachate transfers from stationary leachate storage tanks into leachate tanker trucks, or from leachate tanker trucks into stationary leachate storage tanks, shall be performed via bottom loading.
New Condition #3 (100)	By January 16, 2026, Respondent shall submit a feasibility assessment proposal to assess the viability and functionality of a leachate vapor recovery and control system to recover leachate vapors during loading of liquid/leachate into the leachate tanker trucks and control the recovered vapors either in Respondent's existing landfill gas control system or in a new or modified system. The proposal shall be submitted to the South Coast AQMD [attn: Baitong Chen, bchen@aqmd.gov ; Nathaniel Dickel, ndickel@aqmd.gov ; Christina Ojeda, cojeda@aqmd.gov] for review and approval. Respondent shall incorporate South Coast AQMD comment(s) on the proposal and shall submit a revised proposal, or shall provide detailed justification for not incorporating the comment(s), within 15 days of receipt of South Coast AQMD comment(s) unless otherwise approved in writing by South Coast AQMD. Upon approval by South Coast AQMD, Respondent shall conduct the feasibility assessment. Respondent shall submit a final report to South Coast AQMD within 150 days of the approval of the feasibility assessment proposal [attn: Baitong Chen, bchen@aqmd.gov ; Nathaniel Dickel, ndickel@aqmd.gov ; Christina Ojeda, cojeda@aqmd.gov] detailing the results of the feasibility assessment, including at a minimum, all equipment considered (tank trucks with standard vapor balance capabilities, vapor collection equipment, existing and/or new designed adapters for tank truck vapor connections, vapor recovery/collection equipment, vapor recovery/control configurations, etc.), companies contacted as part of the assessment and associated written communication logs, and any further details collected or considerations made relating to feasibility of a leachate vapor collection and control system. If during the feasibility assessment, Respondent determines that such a system is feasible, the submitted report shall include a workplan for the installation and operation of the leachate vapor recovery and control equipment and related installations. The workplan shall include a timeline for permit application submittals,

South Coast AQMD v. Chiquita Canyon, LLC (Case 6177-4)

**South Coast AQMD v. Chiquita Canyon, LLC (Case No. 6177-4):
December 2025 Stipulated Proposed Modifications**

Condition	Stipulated Language
	and procurement of the leachate vapor recovery and control equipment and for the commencement of leachate vapor recovery and control.
New Condition #4 (101)	For the purpose of this Order for Abatement, construction spoils are landfill trash, material that is mixed with or in contact will landfill trash, or odorous material that is removed from well holes or trenches, there shall be no stockpiling of construction spoils on the landfill surface at any time, except for temporary staging for purposes of appropriate disposal. All construction spoils shall be deposited at an appropriate disposal site within one hour of generation or as deemed necessary by South Coast AQMD. Deposited means, they shall be covered with a minimum of 6 inches of clean dirt, approved foam, or heavy-duty plastic sheeting. Foam by itself shall not be used as a cover if it is raining or if rain is predicted by National Weather Service prior to the next scheduled working day.
New Condition #5 (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.
New Condition #6 (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.
104	Respondent shall return for a status and modification hearing on May __, 2026, or as soon thereafter as the Hearing Board can schedule a hearing.