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**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

**EXHIBIT M TO DECLARATION
OF PATRICK SULLIVAN, BCES,
CPP, REPA**

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

Archived: Friday, December 20, 2024 9:24:22 AM
From: [Viswanathan, Srividhya](#)
Mail received time: Sat, 14 Dec 2024 03:33:27
Sent: Friday, December 13, 2024 7:33:34 PM
To: bchen@aqmd.gov ndickel@aqmd.gov [Christina Ojeda](#)
Cc: [Jones, Art Sullivan](#), Patrrauls@montrose-env.com
Subject: CCL: Condition 72 Recommendation
Importance: Normal
Sensitivity: None

[EXTERNAL SENDER: Use caution with links/attachments]

All,

Below please find the Reaction Committee's recommendation on additional vapor flow testing pursuant to Condition 72(c) of the Stipulated Order for Abatement with South Coast AQMD in Case No. 6177-4.

Per Condition 72(c) of the SOFA, CCL is required to respond to the AQMD by December 13, 2024, with a recommendation on testing for concentrations of chemical constituents that may be present in the gaseous-phase emissions being recovered from the leachate storage tanks. This is referred to as "vapor flow testing" in the language under Condition 72(c) of the modified SOFA. As a reminder, the head space in these leachate storage tanks is under vacuum and the vapor are being recovered and introduced into the landfill gas (LFG) collection system for combustion at the existing control devices.

The Reaction Committee is proposing to conduct monthly field testing to collect methane (CH₄), carbon dioxide (CO₂), oxygen (O₂), and balance gas concentrations of the gaseous-phase emissions that may be present in the head space of the leachate storage tanks, also known as "leachate vapor flow from the leachate tanks". Based on the testing conducted in October 2024, the concentrations of constituents of interest in the leachate vapors are much lower than constituent concentrations present in the raw LFG. Additionally, the flow (quantities) of these leachate vapors is being measured and recorded with dedicated flow meters for the leachate tanks, after which the collected leachate vapors are comingled with the LFG before being combusted in the flares. Sampling and analysis of LFG at the flare station is conducted after the leachate vapors are co-mingled into the gas stream, thus these data also reflect the contribution of leachate vapors to these contaminant concentrations.

Due to the low concentrations and relatively low flow quantities of leachate vapors compared to the concentrations and quantities of the LFG being collected and controlled at the facility, the Reaction Committee recommends that measurement of constituent concentrations within the leachate vapor flow on a monthly frequency is adequate to properly monitor and characterize leachate vapor concentrations.

Thank you!

**Thanks,
Vidhya**

Srividhya Viswanathan, P.E.*

*Licensed in CA, NV, AZ and OK

Direct: [\(858\)-583-7757](tel:(858)583-7757)

Cell: [\(858\) 524-9525](tel:(858)524-9525)

Email: sviswanathan@scsengineers.com