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 A TO DECLARATION OF PATRICK SULLIVAN, BCES, CPP, REPA

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

Hearing Date:	October 29 and November 12, 2025
Hearing Time:	9:30 A.M.
Place:	Hearing Board South Coast Air Quality Management District, 21865 Copley Drive Diamond Bar, CA 91765

June 3, 2025

Mr. Baitong Chen
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, California 91765

Subject: Reaction Committee Determination on TOX Usage
Chiquita Canyon Landfill – Castaic, California

Dear Mr. Chen:

In accordance with Condition No. 22 of the Stipulated Order of Abatement (SOFA) pertaining to the Chiquita Canyon Landfill (Landfill) (Case No. 6177-4), the Reaction Committee has further reviewed the status of the existing portable thermal oxidizer (TOX) units being used to assist in the processing and destruction of landfill gas (LFG) from the reaction area. Currently, the site operates two TOX units: (1) a Zeeco unit with the ability to process 2,000 standard cubic feet per minute (scfm) of LFG, and (2) a Parnel unit rated for 2,000 scfm.[1] For the reasons described in this letter, the Reaction Committee finds that additional backup capacity is needed for the Zeeco and Parnel units, and therefore recommends that Chiquita Canyon, LLC (Chiquita) bring on-site and begin operating a third TOX unit to serve as backup as well as to supplement the existing two units.

The Reaction Committee previously concluded (by letter dated February 15, 2024) that a smaller, lower flow Envent TOX unit (1,600 scfm) was no longer needed to process, control, and destroy the LFG produced from the reaction area. The rationale stated as the basis for removing the Envent unit was that the Landfill had sufficient LFG control capacity with the addition of Flare 3 and that the Zeeco unit could handle all of the reaction gas. Further, the flare station was able to act as back-up to the Zeeco unit and process the reaction gas when the Zeeco unit was offline.

As previously communicated to SCAQMD in a letter dated March 3, 2025, since that time, an extensive network of piping has been installed on the leachate tanks to remove leachate vapors from the tanks. Those vapors are routed to the flare station and contain very little methane, diluting the overall heat input to the flares. At times, over 1,000 scfm of leachate vapors are now being processed at the flare station. Because the reaction gas also has low methane content, when a TOX unit is offline and the flares have to process both leachate vapors and reaction gas, they are not able to sustain combustion and operate properly and experience more frequent downtime. As such, the flares can no longer operate as reliable backup for TOX units.

Because of this development, the Reaction Committee recommended in the March 3, 2025, letter that a second TOX unit be brought back on-site to supplement and act as back-up for the Zeeco unit. This second unit was intended to make for a more reliable control system and allow Chiquita to

[1] Please note that in prior correspondence to the South Coast Air Quality Management District (SCAQMD), the control capacity for the Zeeco unit was reported as 4,700 scfm, and the Parnel unit as 2,500 scfm. Based on recent actual field conditions, it appears these devices are operating at a maximum capacity of 2,000 scfm each and are not currently reaching full rated capacity due to multiple limitations that prevent maximizing the flow, as further explained in Chiquita's *Updated Landfill Gas Generation and Control Capacity Report* submitted to SCAQMD on April 30, 2025 pursuant to SOFA Condition No. 96.

maintain vacuum on the reaction area when the Zeeco unit is offline for maintenance or other reasons. Since that time, the Parnel unit was brought on-site and put into operation.

Originally, the Parnel unit was intended to act primarily as a back-up to the Zeeco unit. However, upon initial operation, it became clear that the Parnel unit was much more useful operating on a full-time basis to supplement the Zeeco unit to provide adequate capacity for the reaction gas. Further, with the downgrade in capacity for the Zeeco unit, it became clear that the Parnel unit is necessary to continuously manage the reaction gas. Therefore, at this time, the Reaction Committee is recommending that a third TOX unit be brought on-site to serve as a back-up whenever the Zeeco and/or Parnel units are offline for maintenance or unscheduled downtime as well as to supplement both units on an as-needed basis. Time is of the essence since there is some planned downtime for the Parnel unit, which has to be moved to accommodate the extended geosynthetic cover installation required by the Department of Toxic Substances Control (DTSC) and the Local Enforcement Agency (LEA).

There was no dissenting opinion among the Reaction Committee members regarding this determination.

Based on this recommendation, Chiquita is bringing a third TOX unit on-site on an expedited basis and will begin operation once it is on-site and installed. A permit application will be filed for this unit, reflecting the fact that it is initially being installed and operated without a permit to construct and Title V revision. The application will be submitted under accelerated permitting, with expedited processing requested and paid.

Please contact either of the undersigned if you have questions or require additional information.

Sincerely,

Robert E. Dick, PE, BCEE
Senior Vice President
SCS Engineers

Patrick S. Sullivan, BCES, CCP
Senior Vice President
SCS Engineers

RED/PSS

cc: Nathaniel Dickel, SCAQMD
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