

**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

**DECLARATION OF SRIVIDHYA
VISWANATHAN, P.E.**

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

I, Srividhya Viswanathan, declare as follows:

1. I am of sufficient age and am competent to testify in this proceeding. I make this declaration based upon personal knowledge and am competent to testify to the facts set forth herein.

Background and Experience

2. As discussed in detail in my prior declarations in Case No. 6177-4, I am a Senior Vice President and Director of Engineering of the Southwest Region of SCS Engineers, Inc. (“SCS”). I have over 20 years of experience in solid waste management services and infrastructure projects. I began working with Chiquita Canyon, LLC (“Chiquita”) in November 2022, primarily advising on Chiquita’s landfill gas wellfield and dewatering system. Since then, I have continued working on these components at the Chiquita Canyon Landfill (“Landfill”).

3. I serve on the Reaction Committee as the subject matter expert on the landfill gas wellfield and dewatering.

4. This declaration is made for the status and modification hearing being held on October 29 and November 12, 2025 on the Stipulated Order for Abatement in Case No. 6177-4 with the South

Coast Air Quality Management District (“South Coast AQMD”), most recently modified on June 24, 2025 (“Modified Stipulated Order”).

Compliance with the June Modified Stipulated Order

5. The Modified Stipulated Order contains 101 conditions, many with multiple subparts, requiring Chiquita to take a wide range of actions designed to slow and stop the landfill reaction, and mitigate any impacts.

6. The chart attached hereto as **Attachment 1** lists conditions that I have been involved with at Chiquita, their requirements, and the current status of compliance.

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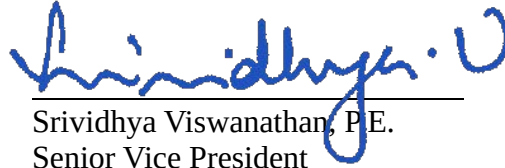
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1 I declare under penalty of perjury under the laws of the State of California that the foregoing is true and
2 correct to my personal knowledge.

3 Executed on this 22nd day of October 2025, in San Diego, California.
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7 Srividhya Viswanathan, P.E.
8 Senior Vice President
9 SCS Engineers
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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT**

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SOUTH COAST AIR QUALITY
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Petitioner,

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

Respondent.

Case No. 6177-4

**ATTACHMENT 1 TO DECLARATION
OF SRIVIDHYA VISWANATHAN, P.E.**

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

Hearing Date: October 29 and November
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Diamond Bar, CA 91765

STIPULATED ORDER CONDITIONS CHART

Condition No.	Summary of Requirement(s)	Status
12(g)(viii)	Conduct an investigation evaluating the existing landfill gas collection and conveyance piping materials, alternative piping materials, and current landfill conditions.	Completed; submitted on June 21, 2024 and posted on Chiquita's Odor Mitigation website (https://chiquitacanyon.com/odor-mitigation/).
13	Expand gas well system and operate additional landfill gas collection equipment as construction is completed.	Compliance ongoing. As of October 21, 2025, Chiquita has installed a total of 375 wells since July 2023, when Chiquita first began installing wells in response to the reaction. Chiquita connected the 18 vertical dual extraction wells that were previously installed to the landfill gas system by September 15, 2023.
13	Continue to operate the two sumps with pumps along the west slope until the final design is implemented.	Completed. As a part of the western slope construction project, Chiquita removed the two operating sumps with pumps and installed approximately 5 or 6 new sumps along the west slope of the Landfill.

Condition No.	Summary of Requirement(s)	Status
15	Continue to evaluate and install vertical dual extraction wells. Comply with all conditions in the currently operative landfill gas collection system permit while installing wells.	Compliance ongoing; see Section M of Condition 8 reports, which are posted on Chiquita's Odor Mitigation website. Notified South Coast AQMD of the number of wells added by October 31, 2023. Submitted the design and installation schedule for 70 additional wells on January 31, 2024, which is posted on Chiquita's Odor Mitigation website. These wells have since been installed.
15(b), (b)(iii)	Install vertical landfill gas extraction wells to the desired depths at the required densities in the initial Reaction Area. In the circumstance that vertical landfill gas extraction wells are incapable of being installed to the desired depths within the initial Reaction Area, install the wells to the depths achievable.	Chiquita installed 50% of wells necessary to achieve the required densities by July 1, 2024 and 75% of these wells by October 1, 2024. Chiquita installed 216 wells within the initial Reaction Area to the depths achievable and at the densities specified by January 6, 2025. Chiquita continues to evaluate whether and when to redrill existing wells or drill new wells deeper to achieve the desired depths.
15(b)(iv), (v)	Complete the Rule 1150.1 remonitoring/corrective action requirements on shortened timelines.	Compliance ongoing, as needed.
15(c)	Notify which wells are scheduled to be installed the following week.	Compliance ongoing while installing wells pursuant to Conditions 15(a) and (b); submitted weekly each Friday and posted on Chiquita's Odor Mitigation website.
15(d)	Notify at least one week in advance when an additional well or set of wells and their associated piping will be installed.	Following installation of wells pursuant to Conditions 15(a) and (b).
15(e), (f), (g), (h), (i)	Use a landfill gas control box vented to an approved emission control system during any drilling; complete and cap each well the same day its construction commences, subject to exceptions; connect each well to an operating landfill gas header or seal the ends of the well with specified seals as soon as the well is installed; properly cover and seal all	Compliance ongoing while drilling wells.

Condition No.	Summary of Requirement(s)	Status
	openings and connections of the landfill gas collection system; and install additional stainless steel, carbon steel, or CPVC wells in the Reaction Area.	
15(j)	Replace any wells in the Reaction Area which are damaged, blocked, pinched, or have gas temperatures exceeding 145°F with CPVC wells, carbon steel, and/or stainless steel wells, or add new wells that replace the landfill gas extraction capacity.	Following installation of wells pursuant to Conditions 15(a) and (b).
15(l)	Install well boots seals on all wells in the Reaction Area in accordance with the installation schedule for the geosynthetic cover.	Compliance ongoing.
15(m)	Submit semi-annual as-built drawings in duplicate.	Compliance ongoing; submitted weekly each Wednesday and posted on Chiquita's Odor Mitigation website.
15(n)	All new vertical extraction wells installed within the Reaction Area must be dual extraction wells; dewatering pumps and associated infrastructure must be installed.	Compliance ongoing.
15(n)	For 75% of wells, installation of all associated infrastructure must be completed within 30 days of completion of the vertical extraction well drilling operation. For the remaining 25% of wells, installation of all associated infrastructure must be completed within 60 days of completion of the vertical extraction well drilling operation.	Compliance ongoing.
15(o)	On a monthly basis, determine whether any of the existing landfill gas collection wells in the Reaction Area, which were not able to be drilled and installed at the desired well depth, can be expanded deeper or drilled to achieve the initially desired depth, or whether new replacement wells can be	Compliance ongoing; see Section M of Condition 8 reports, which are posted on Chiquita's Odor Mitigation website.

Condition No.	Summary of Requirement(s)	Status
	drilled nearby to achieve the initially desired depth.	
17	Expediently dewater wells impacted by liquids and take proactive measures to remove additional liquids in the Reaction Area.	Compliance ongoing; see Section N of Condition 8 reports, which are posted on Chiquita's Odor Mitigation website. As of October 21, 2025, Chiquita has installed 179 pumps in its dual extraction wells and 133 pumps are operational.
17, 17(a)	Install dewatering sumps/pumps in at least 60 percent of the landfill gas vertical extraction wells in the Reaction Area that are capable of extracting liquids by March 15, 2024 unless otherwise determined infeasible.	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. This report is posted on Chiquita's Odor Mitigation website.
18	Provide proposed Reaction Area dewatering guidelines and implementation procedures for the landfill.	Completed; submitted on December 5, 2023; revised on April 4, 2024; further revised on June 7, 2024. These submittals are posted on Chiquita's Odor Mitigation website. Implementation ongoing.
27(a)	Measure and record the leachate temperature within all the 6-inch leachate pipes feeding into the onsite frac tanks, and at the piping leading into the tanks at all tank farms.	Compliance ongoing; see Section Q(i) of Condition 8 reports, which are posted on Chiquita's Odor Mitigation website.
27(d)	Measure and record quantities of leachate sent off-site for disposal/treatment during the previous week.	Compliance ongoing; see Section Q(iv) of Condition 8 reports, which are posted on Chiquita's Odor Mitigation website.
27(d)	Record on a weekly basis quantities of leachate collected and treated onsite.	Compliance ongoing; see Section Q(iv) of Condition 8 reports, which are posted on Chiquita's Odor Mitigation website.
27(d)	Submit copies of leachate manifests within three weeks of request.	Compliance ongoing, upon request.
27(f)	Conduct daily inspections of leachate tanks, tank connections, ports, valves, tank hoses, and any other equipment associated with leachate tank filling/emptying operations, to determine equipment condition material integrity.	Compliance ongoing.
28	Operate and maintain the landfill gas collection and control system,	Compliance ongoing.

Condition No.	Summary of Requirement(s)	Status
	and condensate/leachate collection system with materials capable of handling gases and/or liquids at the temperatures recorded/measured.	
28	Provide information pertaining to the installed equipment and its specifications, including material/temperature threshold specifications as requested.	Compliance ongoing, upon request.
29	Ensure proper capacity to accumulate onsite and/or dispose of collected liquids/leachate at an appropriate facility or facilities.	Compliance ongoing; see Section R of Condition 8 reports, which are posted on Chiquita's Odor Mitigation website.
37	Take and analyze per U.S. EPA Method 624.1 at least ten liquid samples from wells with pumps located in the Reaction Area.	Completed; sampled by March 5, 2024; submitted laboratory results on March 15, 2024, which are posted on Chiquita's Odor Mitigation website.
38	Take representative monthly samples of liquids from the Reaction Area and the bottom tanks where liquids/leachate from the entire Landfill collect and analyze per U.S. EPA Method 624.1.	Compliance ongoing; most recently submitted on July 14 and October 9, 2025. These sampling results are posted on Chiquita's Odor Mitigation website.
53	Submit weekly reports on leachate tanks, the quantity of liquid collected and treated, and the quantity of seeping, pooling, or ponding leachate collected.	Compliance ongoing; submitted weekly each Wednesday and posted on Chiquita's Odor Mitigation website.
63	Provide South Coast AQMD with a schematic of the leachate treatment and storage system.	Completed; submitted by April 22, 2024 and posted on Chiquita's Odor Mitigation website.
65	Provide weekly summaries of leachate dewatering pump installation activities.	Compliance ongoing; submitted weekly each Friday and posted on Chiquita's Odor Mitigation website.
68	Install differential pressure gauges on each leachate tank; monitor and record daily the differential pressure of each leachate tank.	Installation completed by July 10, 2024; compliance ongoing; see Section V of Condition 8 reports, which are posted on Chiquita's Odor Mitigation website.
72(d)	Until the pressure gauges are installed, conduct pressure testing and monitoring within the HDPE header(s) venting the leachate storage tanks daily.	Completed.
86, 86(a)	Comply with additional	Compliance ongoing.

Condition No.	Summary of Requirement(s)	Status
	requirements until the final approval of the liquid/condensate/leachate treatment and/or storage permits, for all liquid treatment and storage equipment operating on site. These requirements include specifications related to vapor leaks, sample ports, equipment associated with the treatment or storage processes, and dedicated piping connected to that equipment. The requirements also concern properly maintaining the equipment and ensuring proper personnel operate and maintain it.	
86(c)	Install sampling ports on all leachate tanks as needed.	Completed; installed by November 1, 2024.
86(c)	Submit a schematic of the leachate treatment equipment showing where the sampling ports are located.	Completed; submitted by November 1, 2024 and posted on Chiquita's Odor Mitigation website.
89	Comply with additional requirements for equipment that requires a permit until a permit is approved, including keeping the equipment and associated ancillary parts properly maintained and in good operating condition at all times, and operated and maintained by personnel properly trained in its operation.	Compliance ongoing.