

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

3 **In The Matter Of**

4 SOUTH COAST AIR QUALITY
5 MANAGEMENT DISTRICT,

6 Petitioner,

7 vs.

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

11 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: May 28, 2026

Hearing Time: 9:30 A.M.

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

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13 I, Srividhya Viswanathan, declare as follows:

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

16 **Background and Experience**

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

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

25 4. This declaration is made for the status and modification hearing being held on May 28,
26 2026 on the Stipulated Order for Abatement in Case No. 6177-4 with the South Coast Air Quality
27 Management District (“South Coast AQMD”), most recently modified on December 9, 2025
28

1 (“Modified Stipulated Order”).

2 **Compliance with the December Modified Stipulated Order**

3 5. The Modified Stipulated Order contains 107 conditions, many with multiple subparts,
4 requiring Chiquita to take a wide range of actions designed to slow and stop the landfill reaction, and
5 mitigate any impacts.

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

8 **Leachate Extraction Has Been Limited by Disposal Capacity & Cover Installation**

9 7. It is my understanding that Chiquita was informed unexpectedly in late January 2026
10 that its largest and most consistent outlet for treated, non-hazardous leachate would be unable to
11 continue accepting consistent leachate shipments from Chiquita as a result of a disagreement between
12 various Los Angeles County agencies.

13 8. On February 17, 2026, as a result of the unexpected reduction in off-site leachate
14 disposal capacity, Chiquita was forced to turn off many dewatering pumps. Approximately thirteen (13)
15 dewatering pumps in vertical extraction wells and thirty-nine (39) dewatering pumps in perimeter
16 sumps were able to remain operational. The pumps taken offline were associated with A, B, and C
17 liquid force mains, though dewatering pumps associated with C force main line were operational
18 shortly thereafter. Taking the dewatering pumps offline corresponded to an approximately one-third
19 reduction in leachate extraction.

20 9. Chiquita constantly monitors and tracks its liquids extraction rates and turns dewatering
21 pumps back on when possible. As of May 14, 2026, there are a total of 102 dewatering pumps
22 operating in dual-extraction wells, with an additional 47 dewatering pumps operating in perimeter
23 sumps.

24 10. In addition to the disposal capacity issues, some of these pumps have also been taken
25 offline to accommodate the ongoing geomembrane cover deployment project. Approximately 15 to 20
26 dewatering pumps and 16 to 38 vertical landfill gas extraction wells have been taken offline each
27 month in order to install the 60-mil EVOH/HDPE cover as required by a July 25, 2025 letter from the
28 U.S. Environmental Protection Agency. This major installation project began in July 2025. Once EVOH

1 installation is completed in a particular segment of the project, the pumps and wells are brought back
2 online.

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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 21st day of May 2026, in San Diego, California.

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7 Srividhya Viswanathan, P.E.
8 Senior Vice President
9 SCS Engineers
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**BEFORE THE HEARING BOARD OF THE
SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT**

In The Matter Of

Case No. 6177-4

SOUTH COAST AIR QUALITY
MANAGEMENT DISTRICT,

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

Petitioner,

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

vs.

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

Hearing Date: May 28, 2026
Hearing Time: 9:30 A.M.
Place: Hearing Board
South Coast Air Quality
Management District,
21865 Copley Drive
Diamond Bar, CA 91765

Respondent.

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 May 20, 2026, Chiquita has installed a total of 365 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.
15	Continue to evaluate and install vertical dual extraction wells. Comply with all conditions in the	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
	currently operative landfill gas collection system permit while installing wells.	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.	Not yet in effect; 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 openings and connections of the landfill gas collection system; and install additional stainless steel, carbon steel, or CPVC wells in the	Compliance ongoing while drilling wells.

Condition No.	Summary of Requirement(s)	Status
	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.	Not yet in effect; 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.	Completed.
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 drilled nearby to achieve the initially desired depth.	Compliance ongoing; see Section M of Condition 8 reports, which are posted on Chiquita's Odor Mitigation website.
17	Expediently dewater wells impacted by liquids and take proactive measures to remove	Compliance ongoing; see Section N of Condition 8 reports, which are posted on Chiquita's Odor Mitigation website. See

Condition No.	Summary of Requirement(s)	Status
	additional liquids in the Reaction Area.	paragraphs 8-10 of this Declaration for a discussion of pump counts.
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.	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, and condensate/leachate collection system with materials capable of handling gases and/or liquids at the temperatures recorded/measured.	Compliance ongoing.
28	Provide information pertaining to the installed equipment and its specifications, including	Compliance ongoing, upon request.

Condition No.	Summary of Requirement(s)	Status
	material/temperature threshold specifications as requested.	
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 November 10, 2025; December 5, 2025; January 6, 2026; February 5, 2026; March 10, 2026; April 8, 2026; and May 6, 2026. These sampling results are posted on Chiquita's Odor Mitigation website.
53	Submit monthly reports on leachate tanks, the quantity of liquid collected and treated, and the quantity of seeping, pooling, or ponding leachate collected.	Compliance ongoing; see Section Q of Condition 8 reports, which are posted on Chiquita's Odor Mitigation website.
63	Provide South Coast AQMD with a schematic of the leachate treatment system and leachate storage system.	Completed; submitted by December 16, 2025 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 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	Compliance ongoing.

Condition No.	Summary of Requirement(s)	Status
	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.
98	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 the atmosphere, excluding any emergency pressure/vacuum relief valves. Inspect the valves and associated liquid and vapor collection receptacles once every 14 days.	Compliance ongoing.