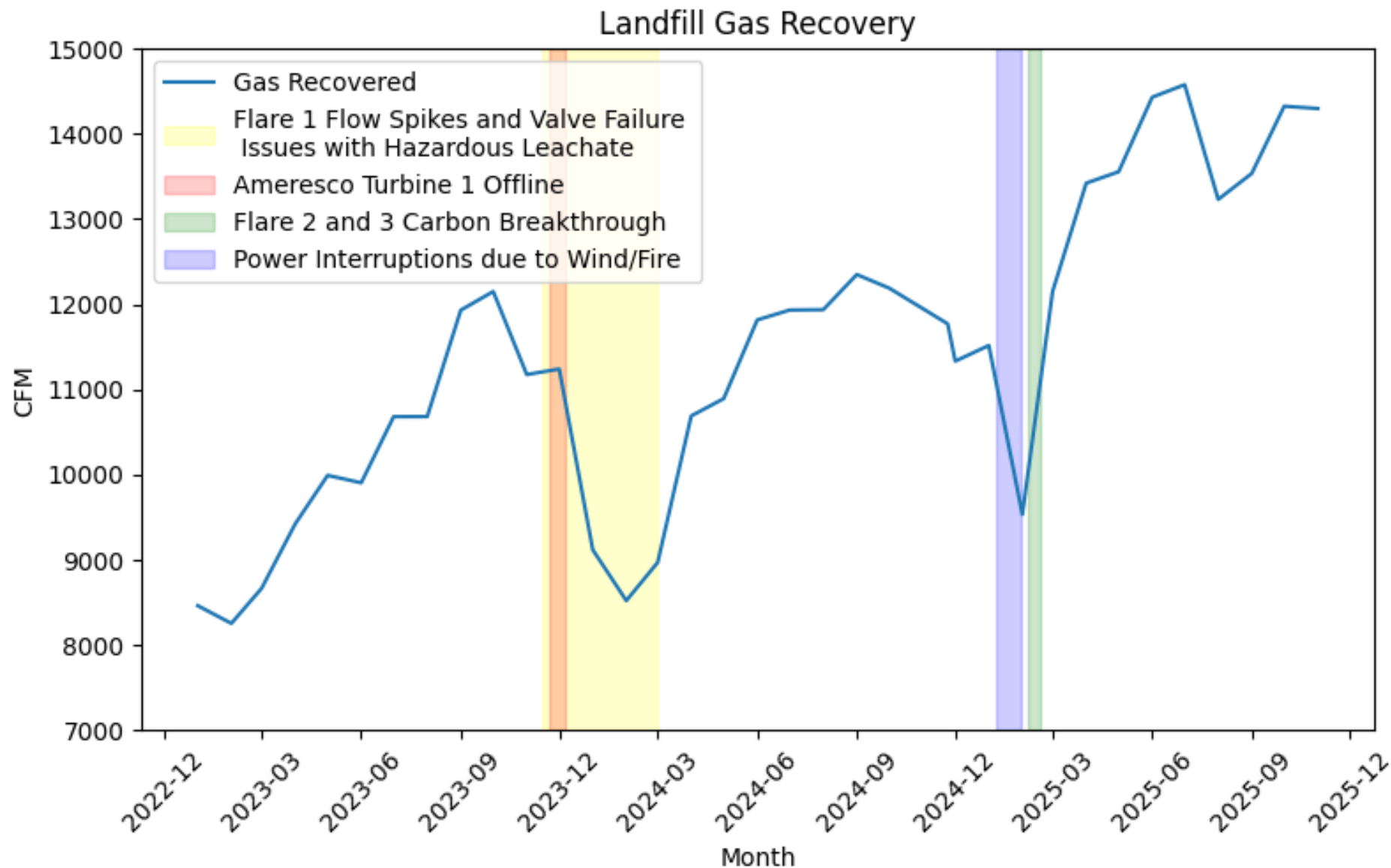


SCAQMD v. CCL Hearing

Patrick
Sullivan, BCES,
CPP, REPA

December 9, 2025



*Data updated through end of November

Landfill Gas Recovery

Time Period	Total Average Gas Recovery (cfm)	Leachate Vapor Flow (cfm)	Average Gas (cfm)
Mar-25	13,286	1,134	12,152
Apr-25	14,268	847	13,421
May-25	14,371	816	13,555
Jun-25	15,146	716	14,430
Jul-25	15,137	560	14,576
Aug-25	14,657	1,427	13,230
Sep-25	15,131	1,596	13,535
Oct-25	14,935	774	14,161
Nov-25	14,828	531	14,297

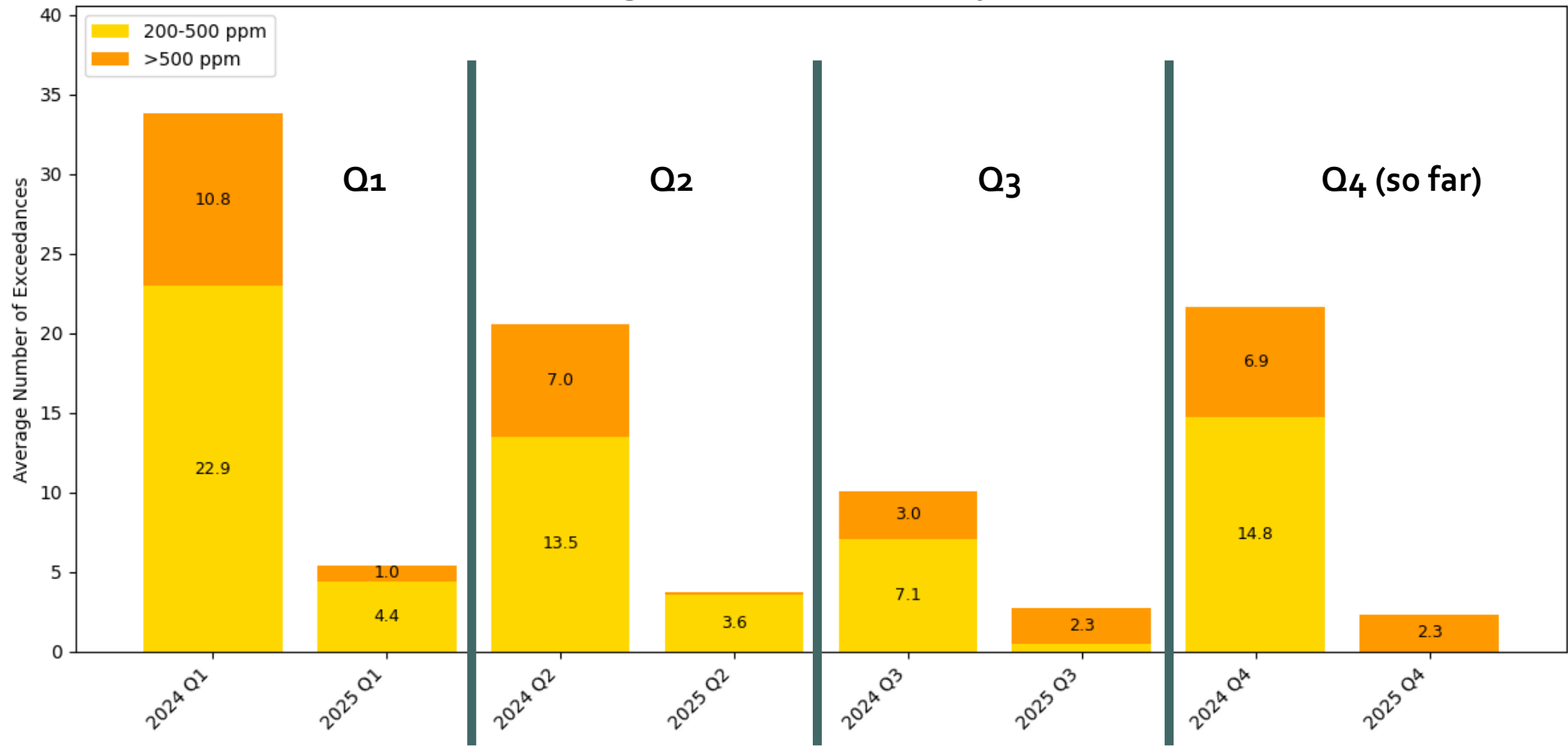
Landfill Gas Generation & Control Capacity

Year		2024	2025	2026	2027	2028	2029
LandGEM LFG Generation	(scfm)	14,770	15,370	15,070	14,770	14,480	14,190
LFG Generation (with reaction gas increase)	15%	16,986	17,676	17,331	16,986	16,652	16,319
LFG Generation (with 6000 scfm redundancy)		22,986	23,676	23,331	22,986	22,652	22,319
Flare 1 (FL-1995)	(scfm)	4,000	4,000	4,000			
Flare 2 (FL-2009)		4,000	4,000	4,000	4,000	4,000	4,000
TOX (Zeeco)		2,000	2,500	2,500	2,500	2,500	2,500
Flare 3 (FL-2023)		6,000	6,000	6,000	6,000	6,000	6,000
Flare 4				6,000	6,000	6,000	6,000
TOX (Parnel)			2,000	2,000	2,000	2,000	2,000
TOX (HERO)			3,300	3,300	3,300	3,300	3,300
Flare 5					6,000	6,000	6,000
Flare/TOX Capacity	(scfm)	16,000	21,800	27,800	29,800	29,800	29,800
Total Capacity	(scfm)	16,000	21,800	27,800	29,800	29,800	29,800

*Data updated through end of November



Average Sniffer Drone Exceedances by Quarter



*Data updated through end of November

Flux Chamber Study Data

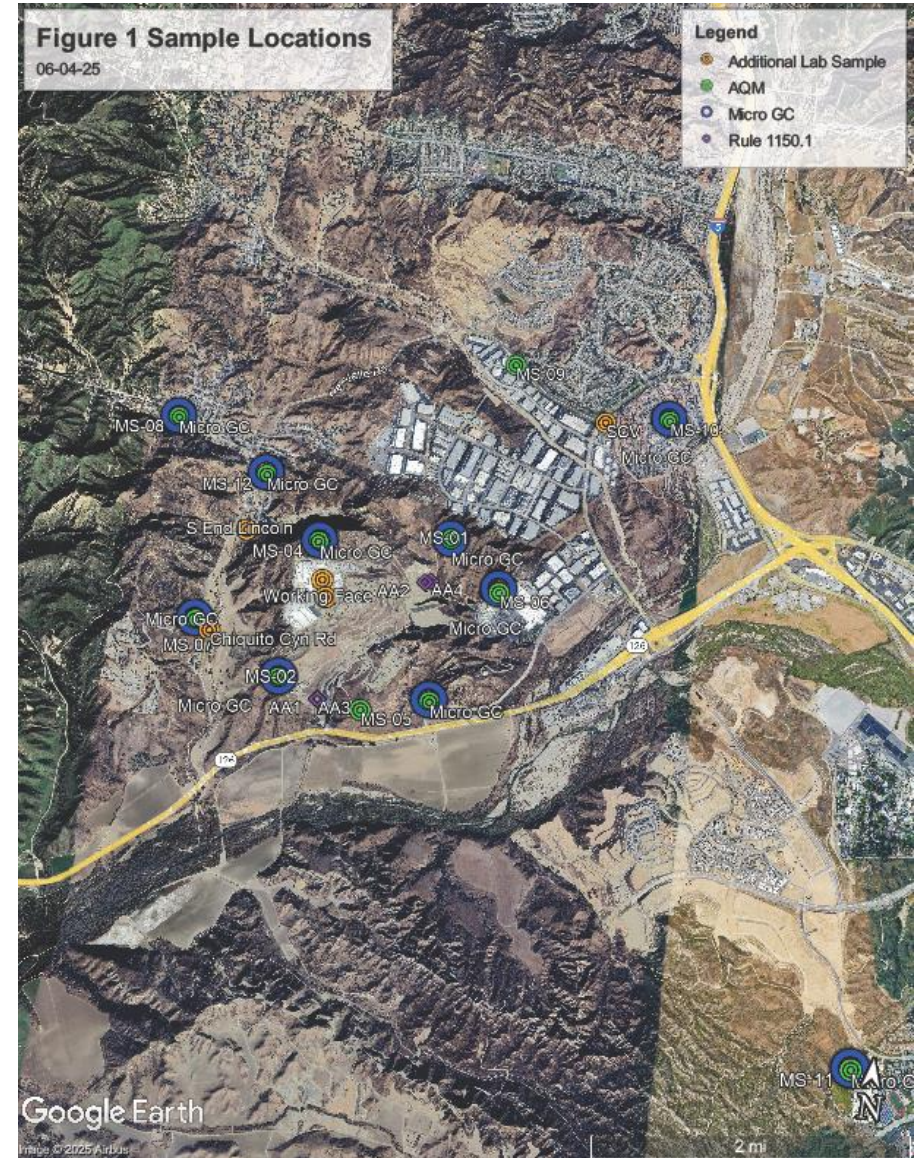
Table 5.7 Comparison of Site-wide Surface Air Emissions (tons/yr) for the Five Test Events.

Compound	Units	Event				
		1 (8/23)	2 (3/24)	3 (11/24)	4 (3/25)	5 (7/25)
Carbon dioxide	tons/yr	41,312	327,049	216,177	100,526	46,702
Methane	tons/yr	3,357	11,456	6,880	4,756	285
Total VOC	tons/yr	207	853	61	26.1	2.6
Ethanol	tons/yr	18.3	NQ	0.42	0.23	0.11
Acetone	tons/yr	17.6	51	1.30	1.38	0.54
Dimethyl sulfide	tons/yr	15.2	57.9	0.93	0.95	ND
Tetrahydrofuran	tons/yr	13.6	107	0.06	0.23	0.01
Benzene	tons/yr	9.33	104	0.27	0.90	0.14
Methanol	tons/yr	9.09	NQ	0.51	0.79	0.45
Methyl ethyl ketone (MEK)	tons/yr	9.06	51.2	0.24	0.30	0.07
Propylene	tons/yr	6.62	29.8	0.69	0.41	0.05
Isopropyl alcohol (IPA)	tons/yr	3.72	15.2	0.18	0.51	ND
Isopropyl toluene	tons/yr	3.25	13.7	0.25	0.42	0.11
Toluene	tons/yr	2.00	18.6	0.22	0.29	0.06
Total Xylenes	tons/yr	1.52	9.79	0.30	0.48	0.08
Ethylbenzene	tons/yr	1.14	10.1	0.16	0.20	0.03
Hydrogen sulfide	tons/yr	0.13	3.81	0.72	0.24	0.15
Note: NQ = Not Quantified, ND = Not Detected						

Air Monitoring Program

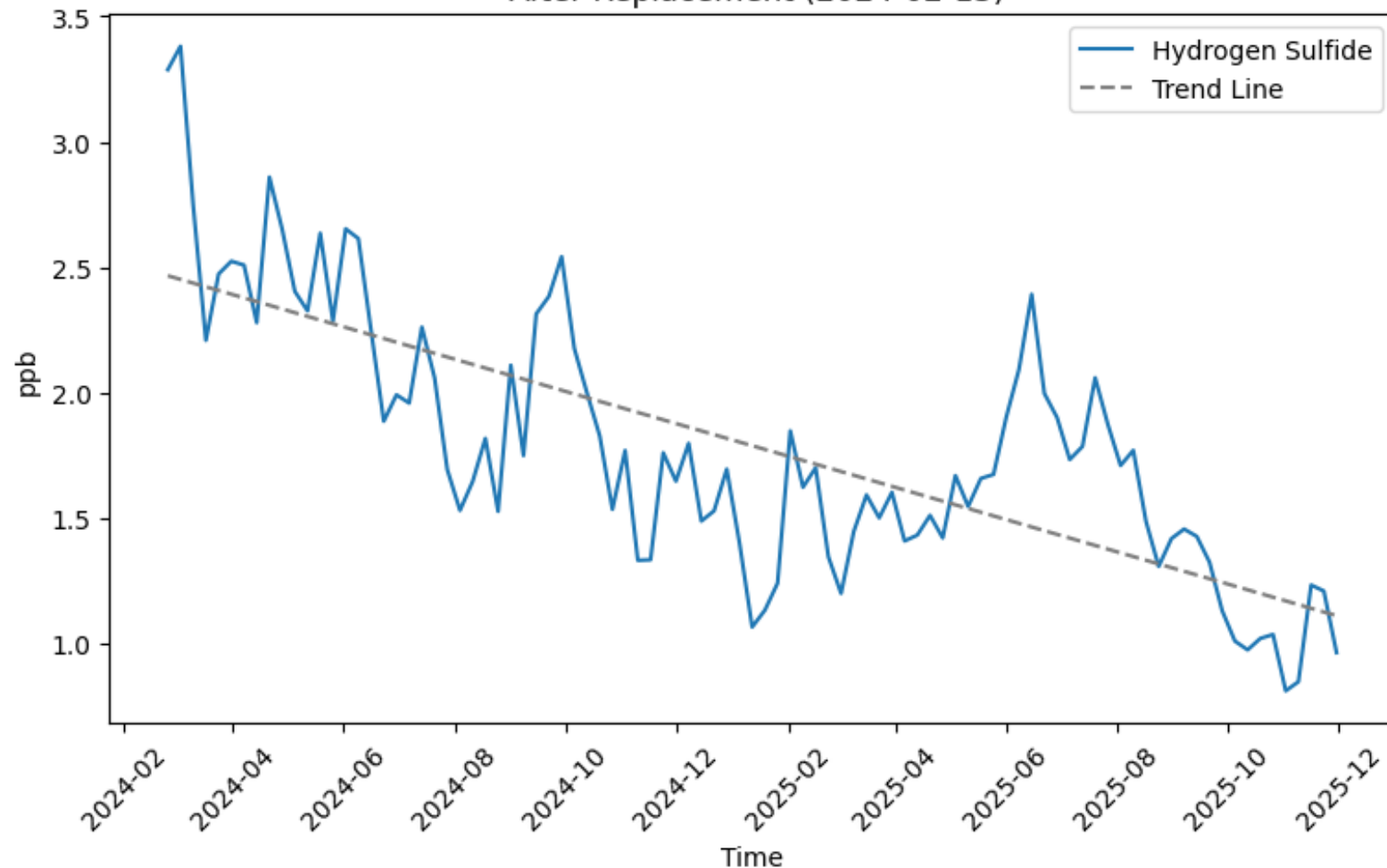
Location/ Sample Name	Continuous			Weekly Discrete	24-Hour	12-Hour
	H ₂ S/ PM ₁₀ / PM _{2.5}	SO ₂	VOC via Micro-GC	307.91 - Sulfur TO-15 - Full List Odor Sampling	307.91 - Sulfur TO-15 - SIM	H ₂ S 1150.1 Table 1 VOCs
Sample Schedule				Monday	Mon-Tues	Monthly
On-Site	MS-01	X	X	X		
	MS-02	X	X	X		
	MS-03	X	X	X		
	MS-04	X	X	X		
	MS-05	X	X	X		
	Working Face			X		
	Reaction Area			X		
	1150.1 Upwind					X
	1150.1 Downwind			X		X
	MS-06	X	X	X	X	
Off-Site	MS-07	X	X	X	X	
	MS-08	X	X	X	X	
	MS-09	X	X	X	X	
	MS-10	X	X	X	X	
	MS-11	X	X	X	X	
	MS-12	X	X	X	X	
	SCV			X		
	Chiquito Cyn Rd			X		
	S End Lincoln			X		

*Weekly discrete sampling ceased on September 1st



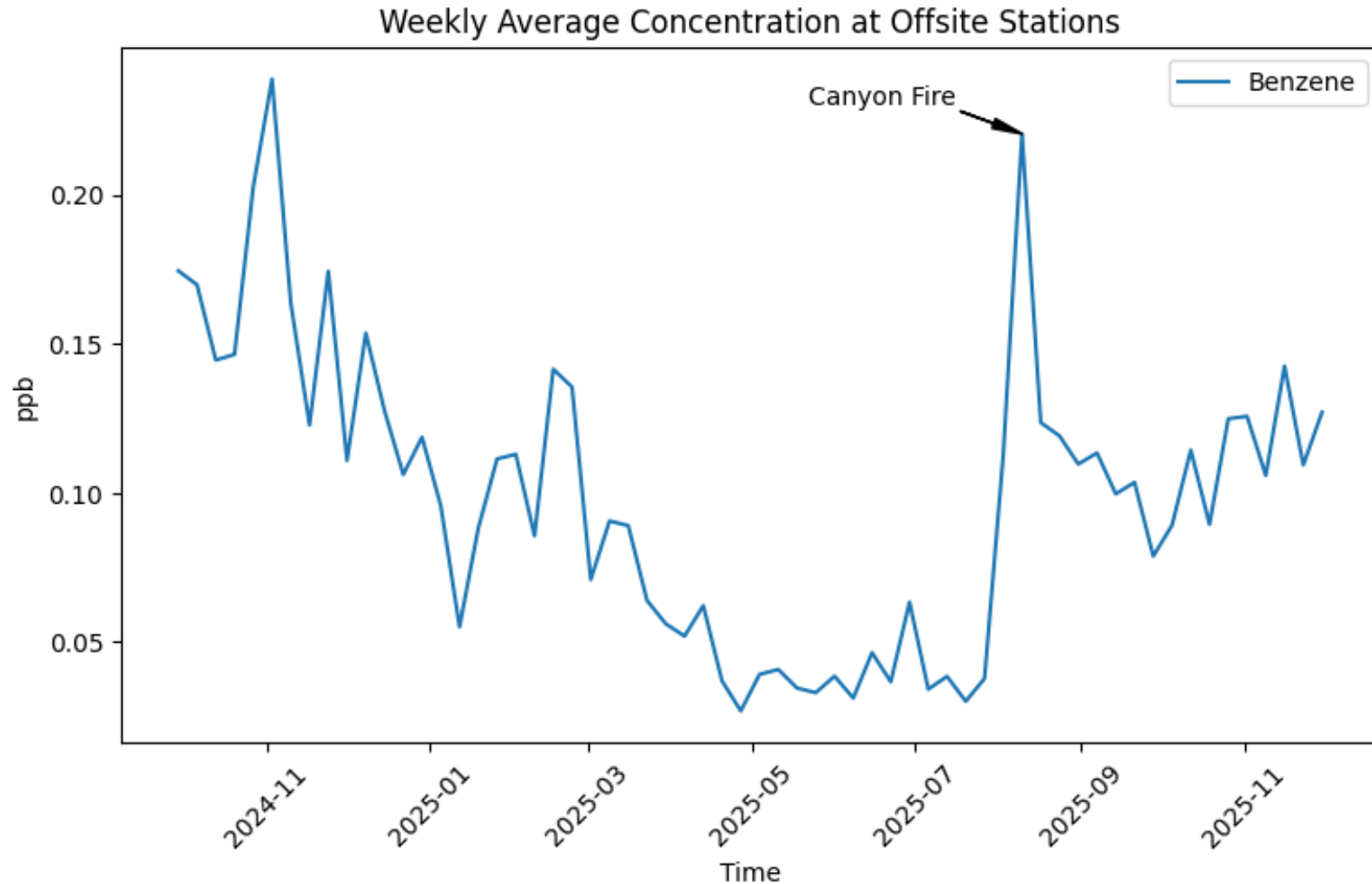
Offsite Hydrogen Sulfide Data

Weekly Average Hydrogen Sulfide Concentration
After Replacement (2024-02-13)



*Data updated through end of November

Offsite Benzene Data



Offsite Acute REL Exceedances

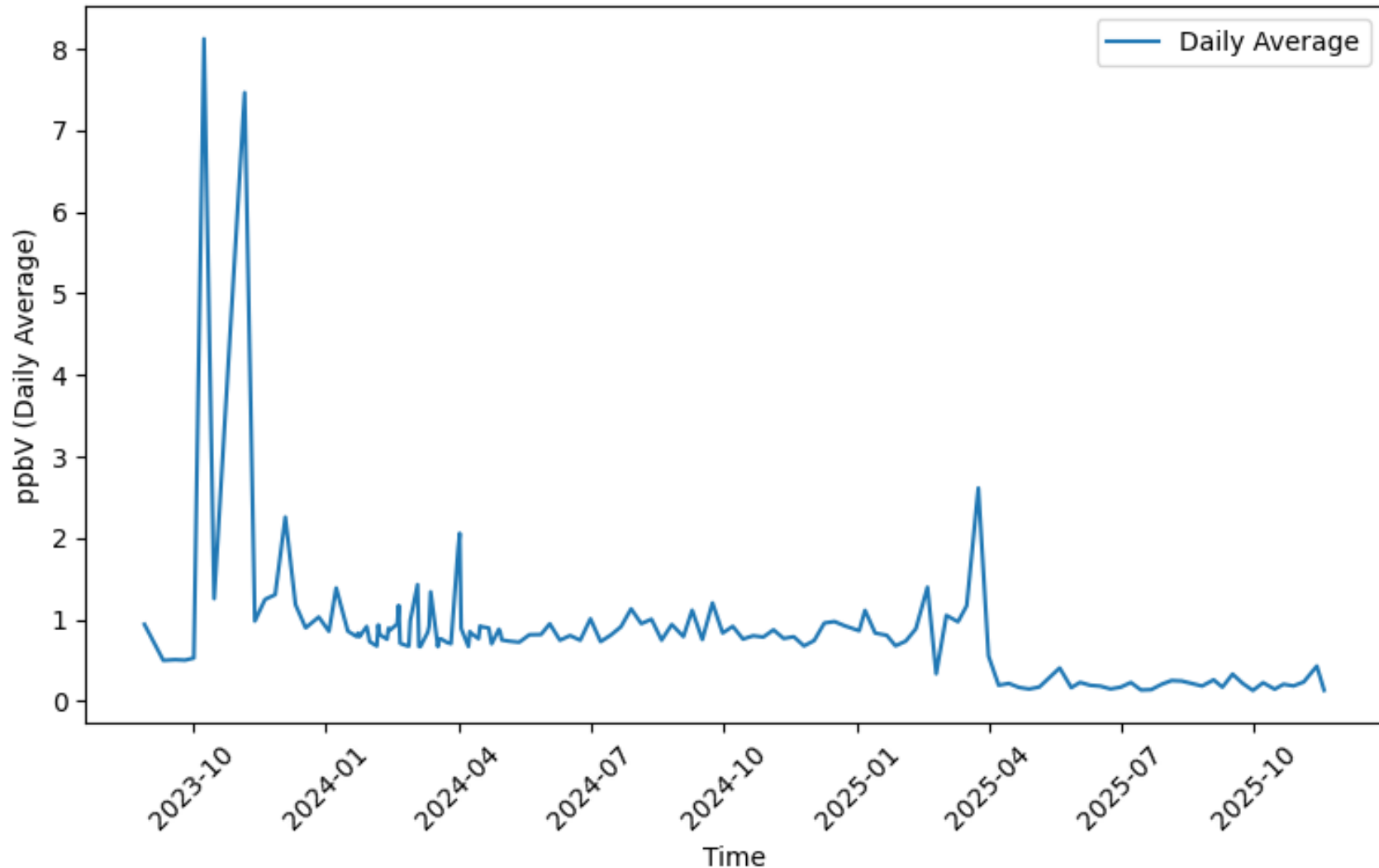
Compound	Max Recorded	OEHHA REL	Number of Data Points	Number Above Threshold	Percent Above Threshold
	(parts per billion – PPB)				
Benzene	14.24	8	56780	2	0.004
2_Butanone	23.48	4,500	56777	0	0
Hydrogen Sulfide	18	30	56157	0	0
Isopropyl Alcohol	68.09	1,300	55825	0	0
Methanol	89.81	21,000	56751	0	0
Toluene	10.84	1,300	56780	0	0
m,p-Xylene	57.45	5,000	55296	0	0
Acrolein**	4.26	1.1	21170	28	0.132

*Data from 6-20-2024 through 11-30-2025

**Discussing validity of exceedance data

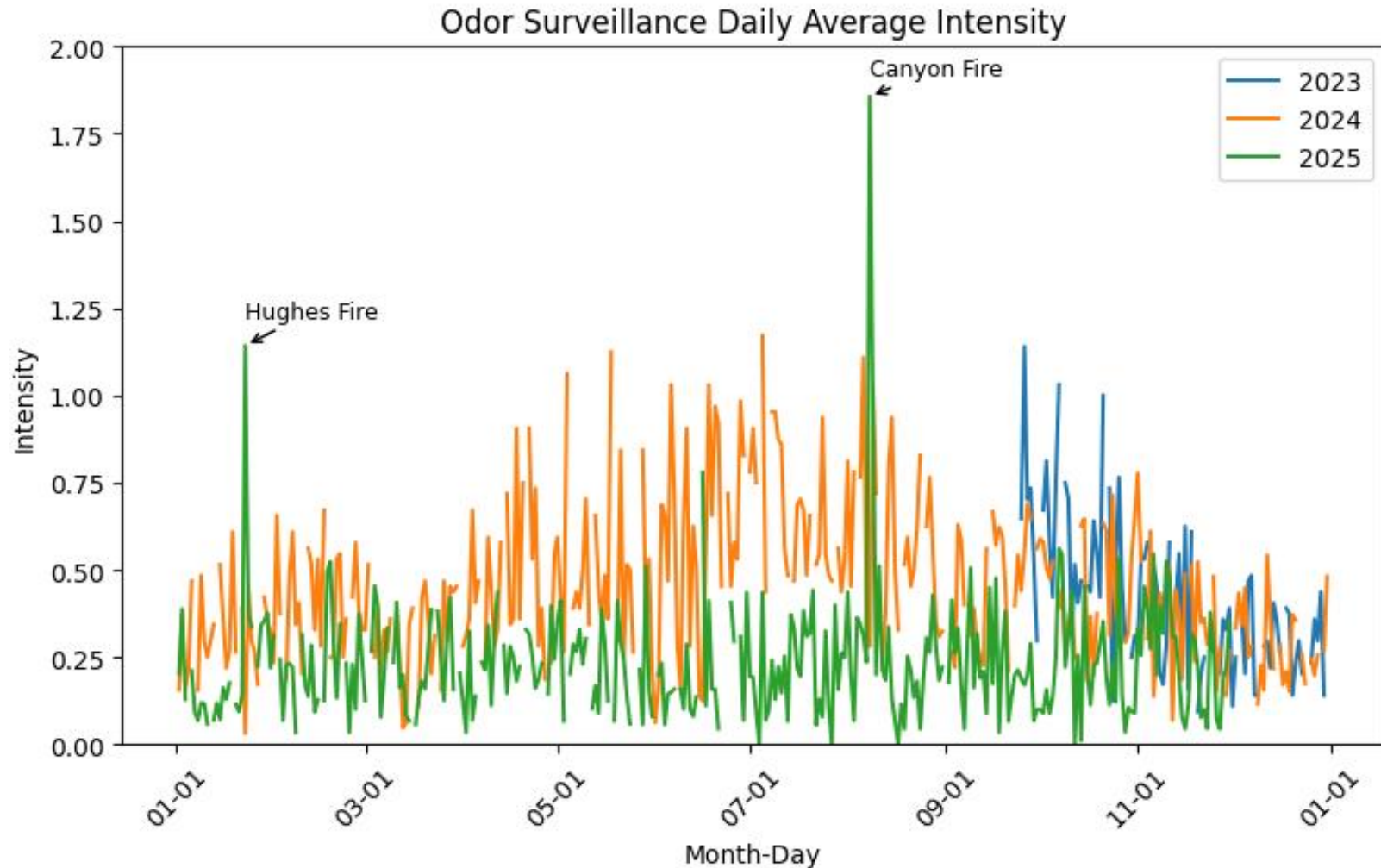
Toluene Lab Data

Daily Average Concentration of Toluene from 24H samples



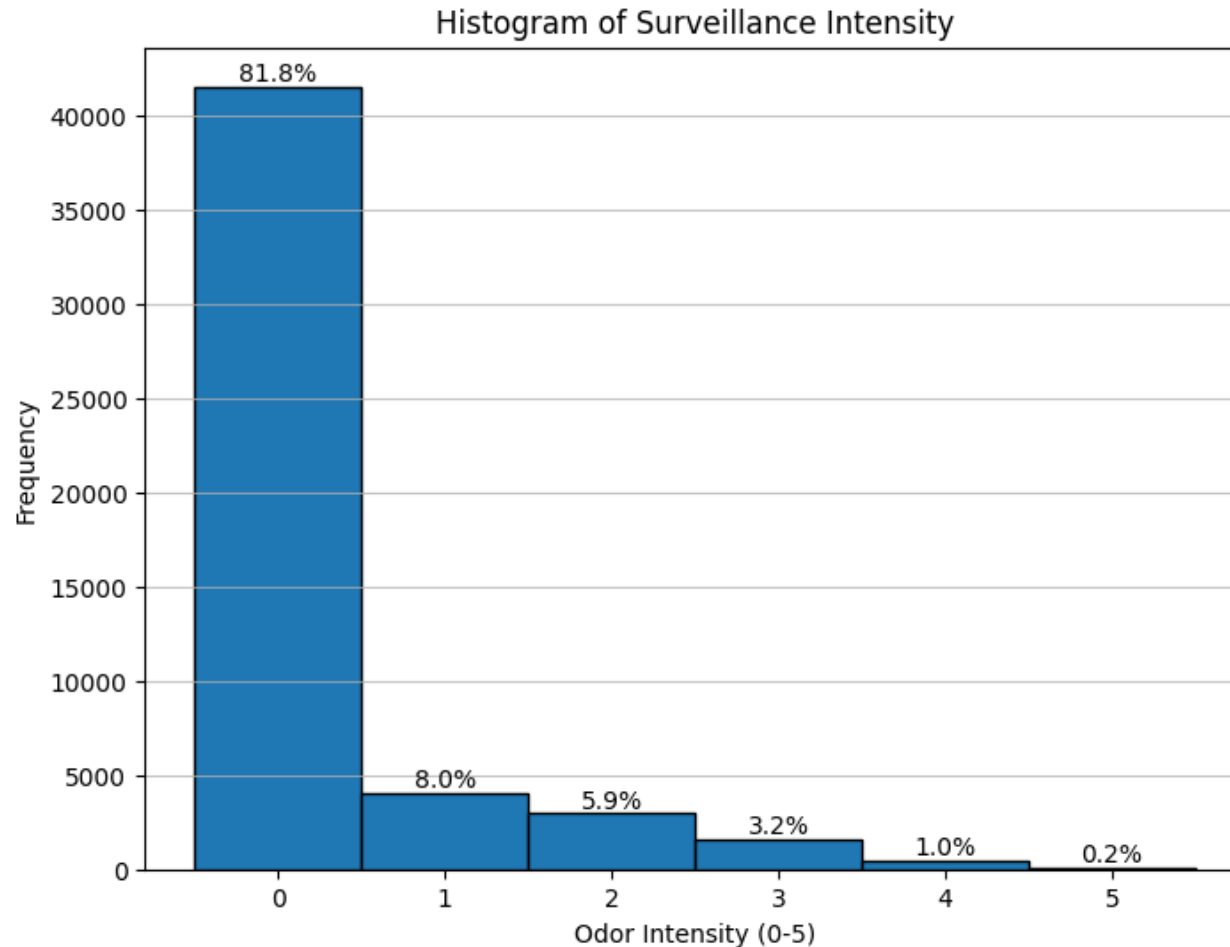
*Data updated through 11-18-2025

Odor Surveillance Intensity Data



*Data updated through end of November

Odor Surveillance Intensity Data

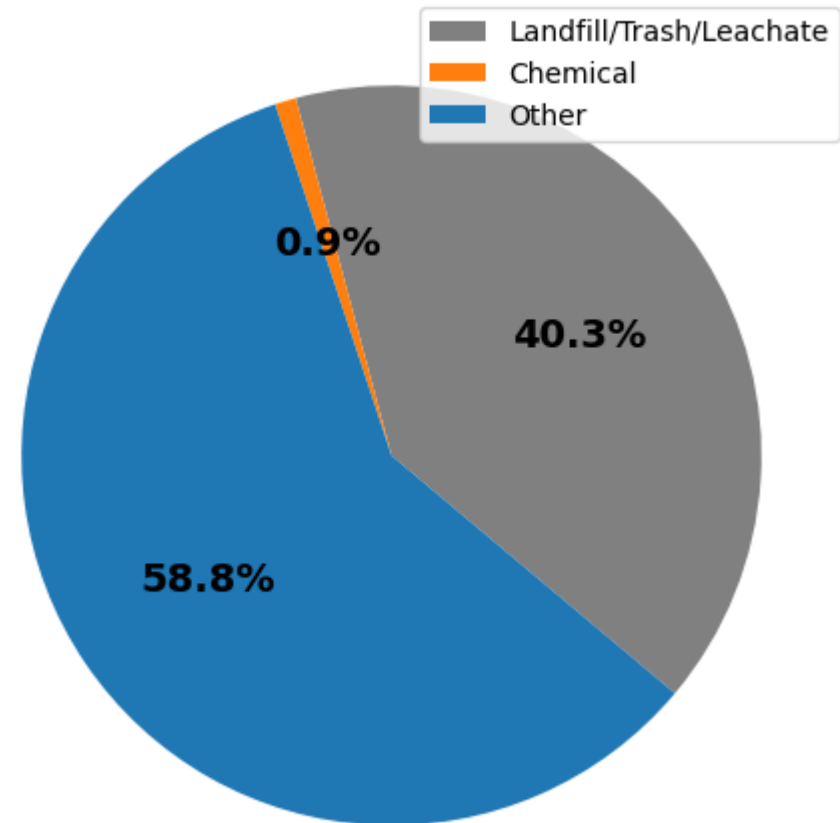


*Data updated through end of November

Odor Description Data

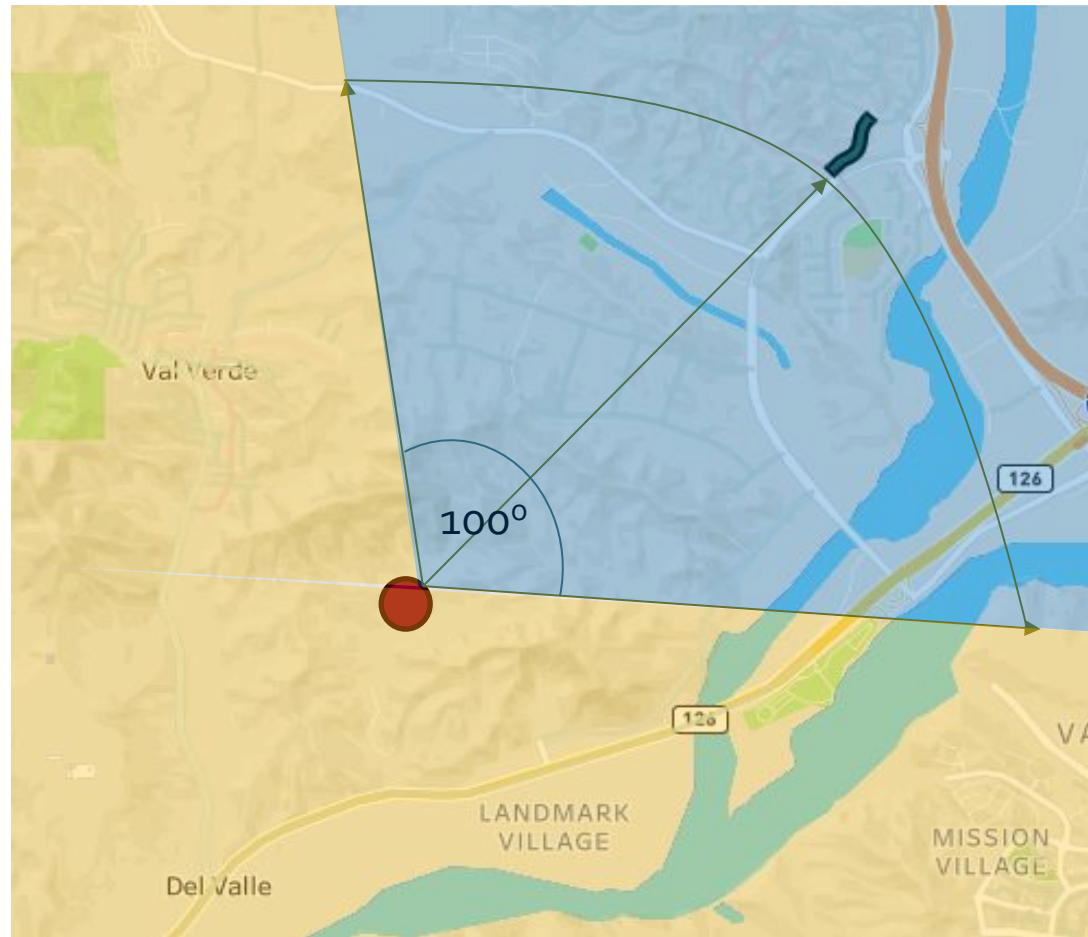
Surveyors were instructed to describe odor unrelated to the landfill as "Other"

Descriptions of Odors from Surveillance Events



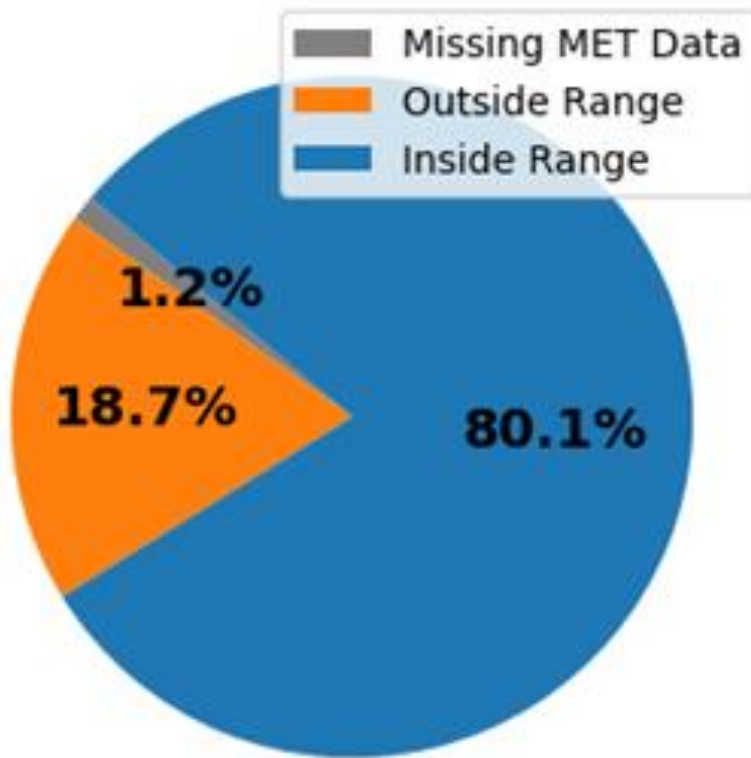
*Data updated through end of November

Wind Direction Test – Street Midpoints

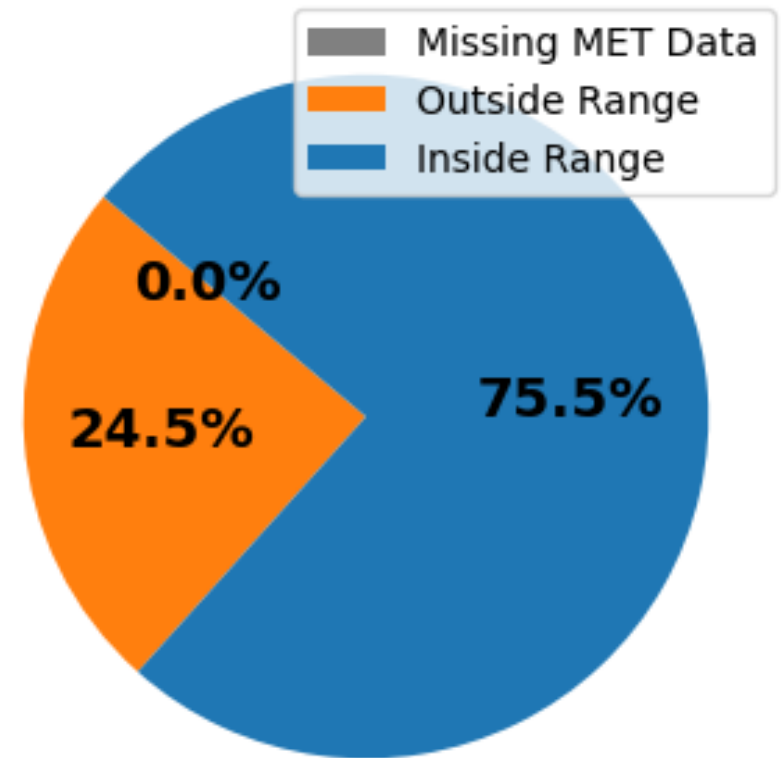


Wind Direction Test – Street Midpoints

2024-2025 Complaints
Wind Direction Test

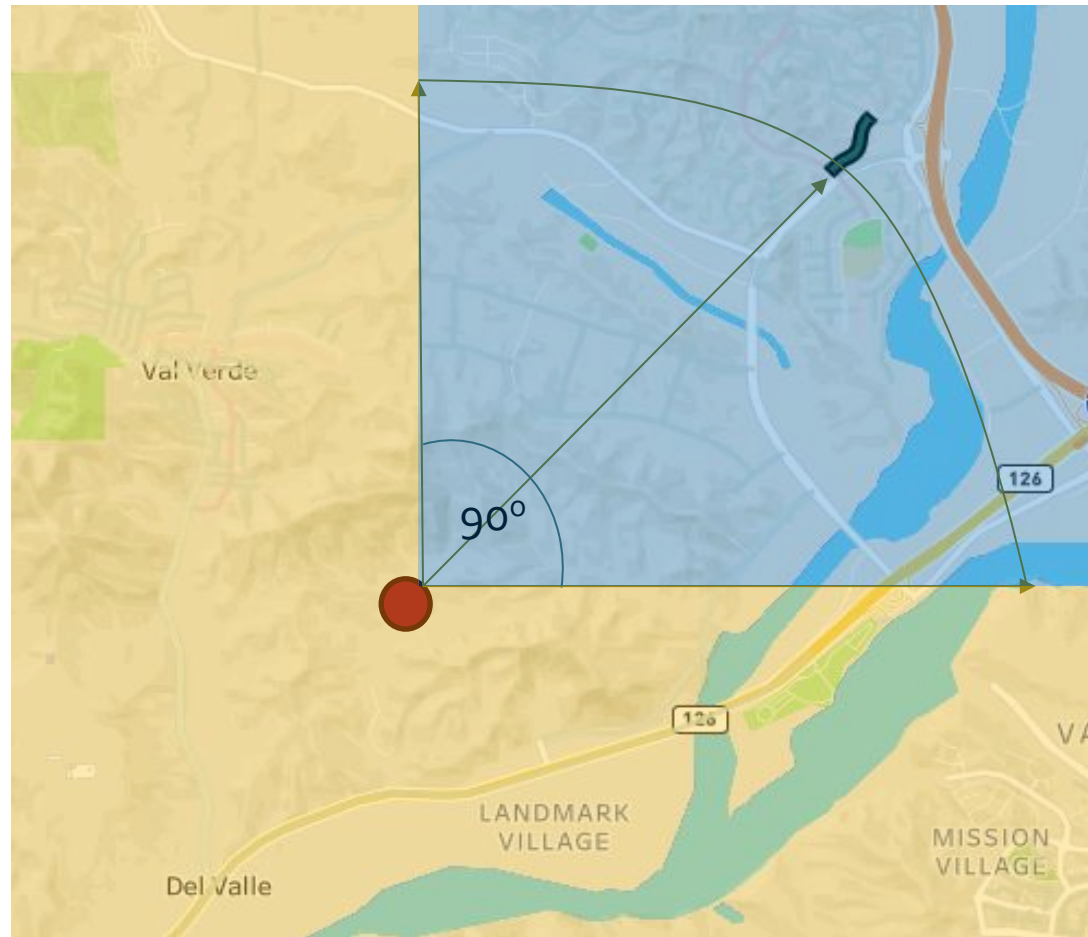


2024-2025 Verified Complaints
Wind Direction Test



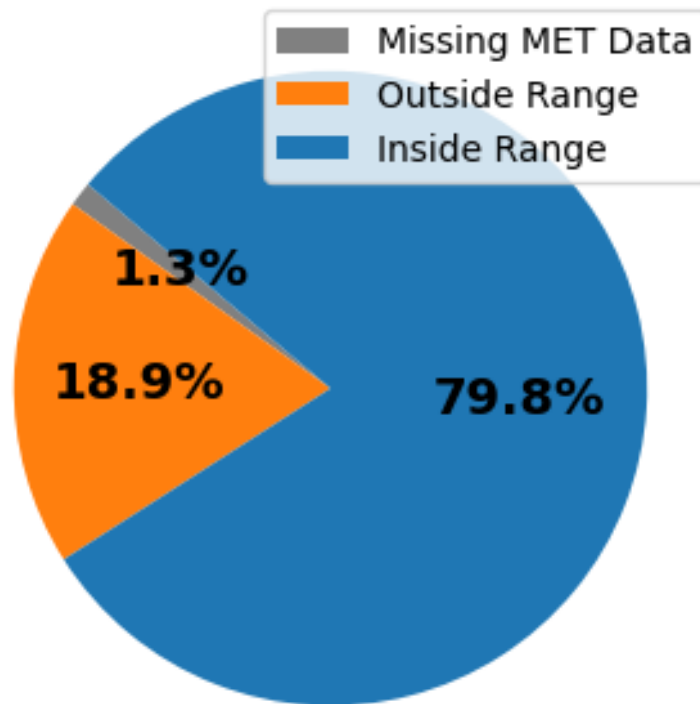
*Data updated through end of October

Wind Direction Test – Exact Addresses

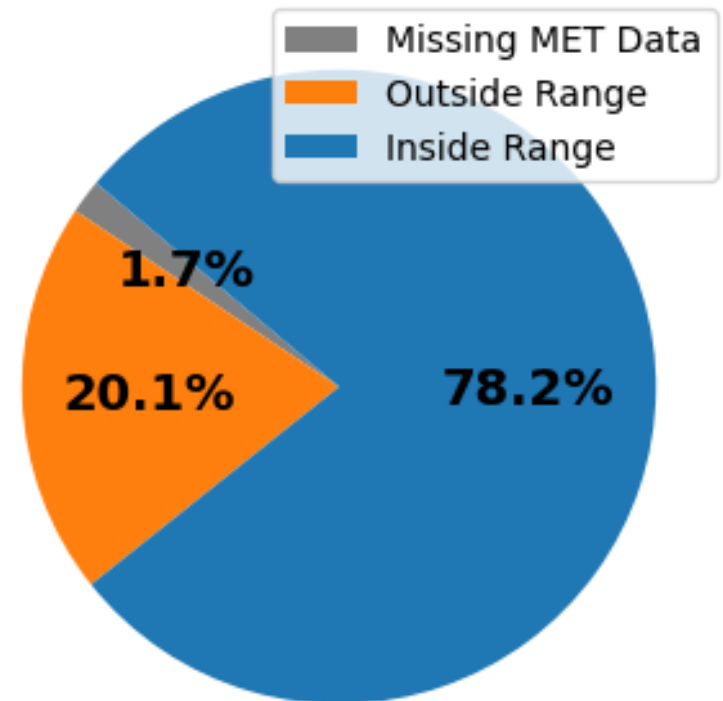


Wind Direction Test – Exact Addresses

2024-2025 Complaints
90 degree Wind Direction Test

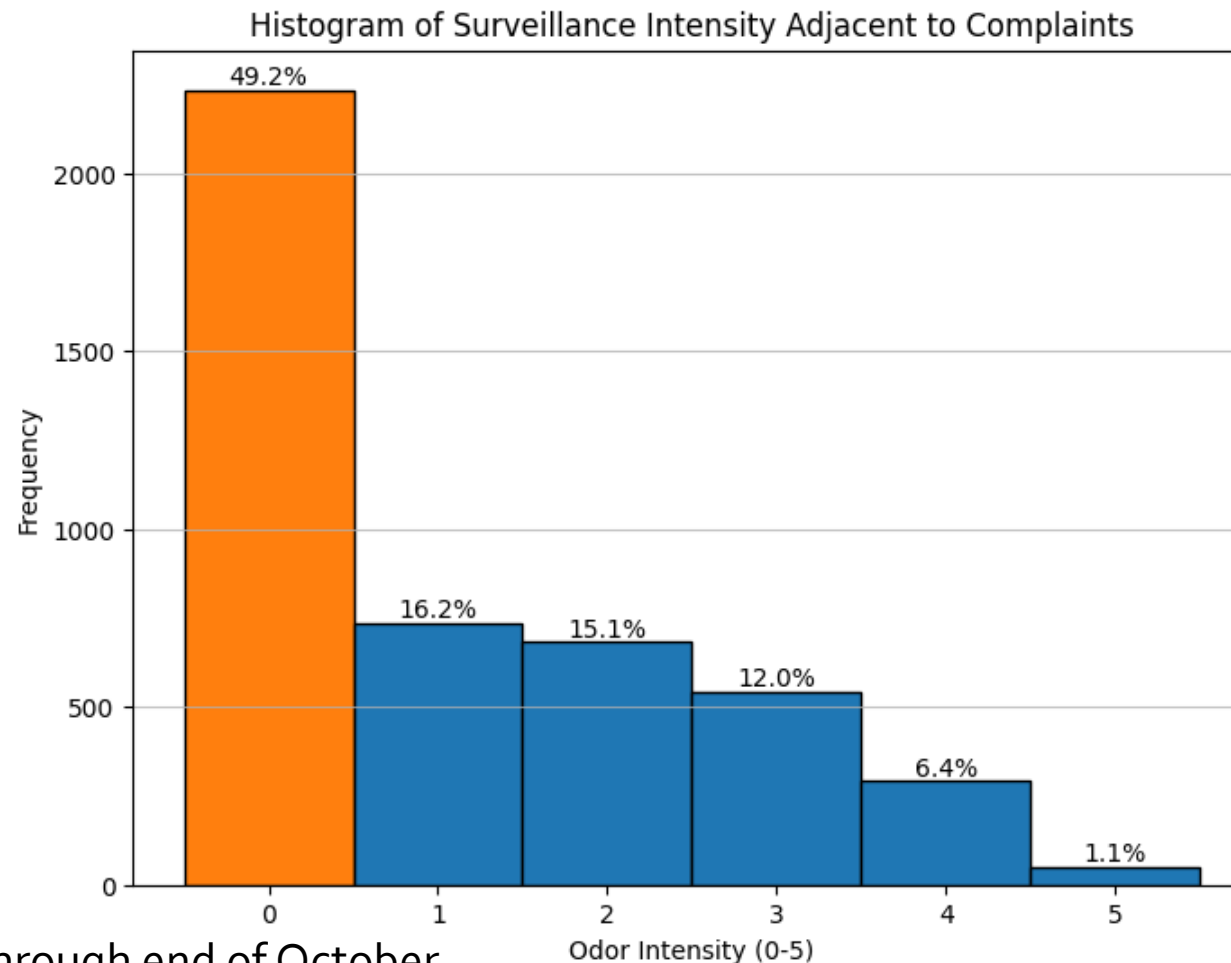


2024-2025 Verified Complaints
90 degree Wind Direction Test



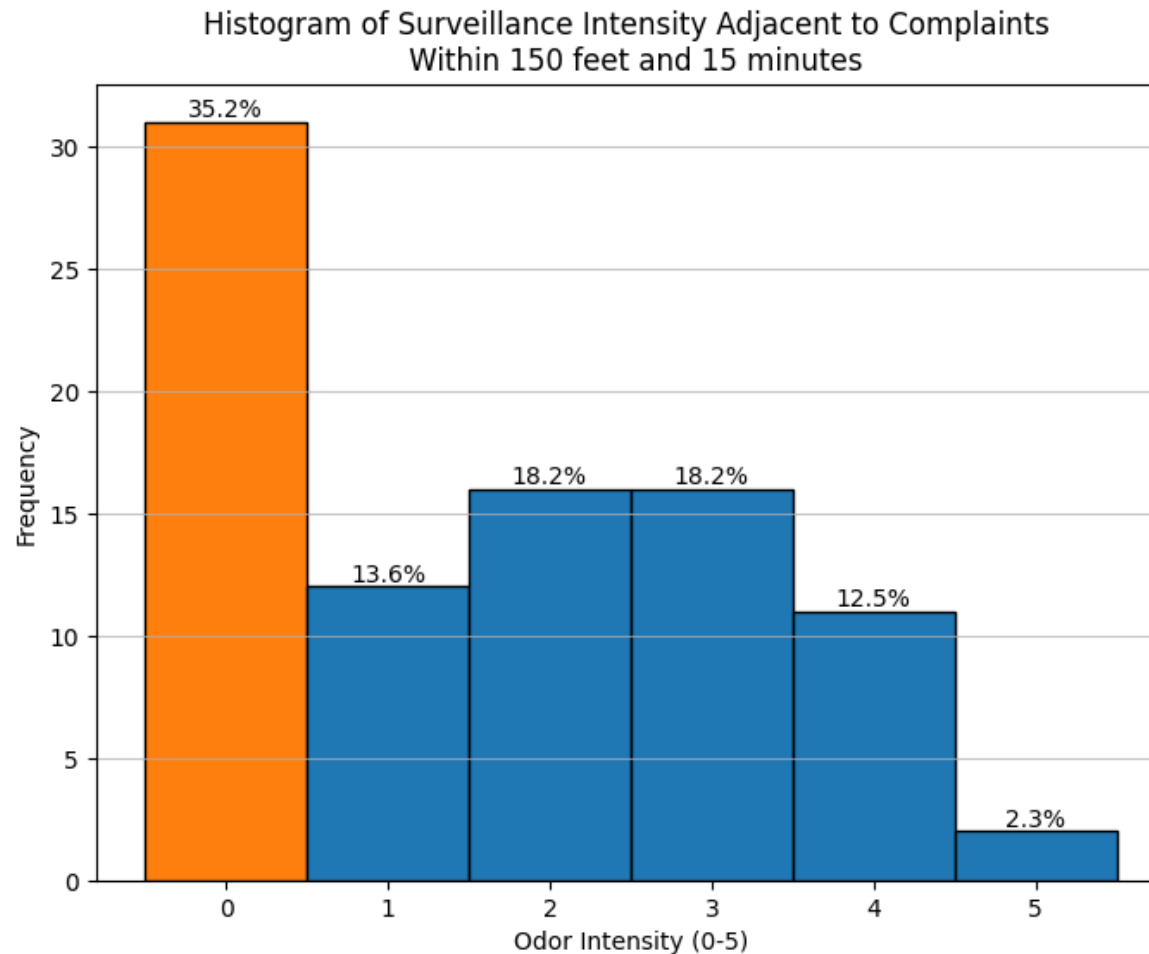
*Data updated to 09-04-25

Odor Surveillance & Complaints – Street Midpoints

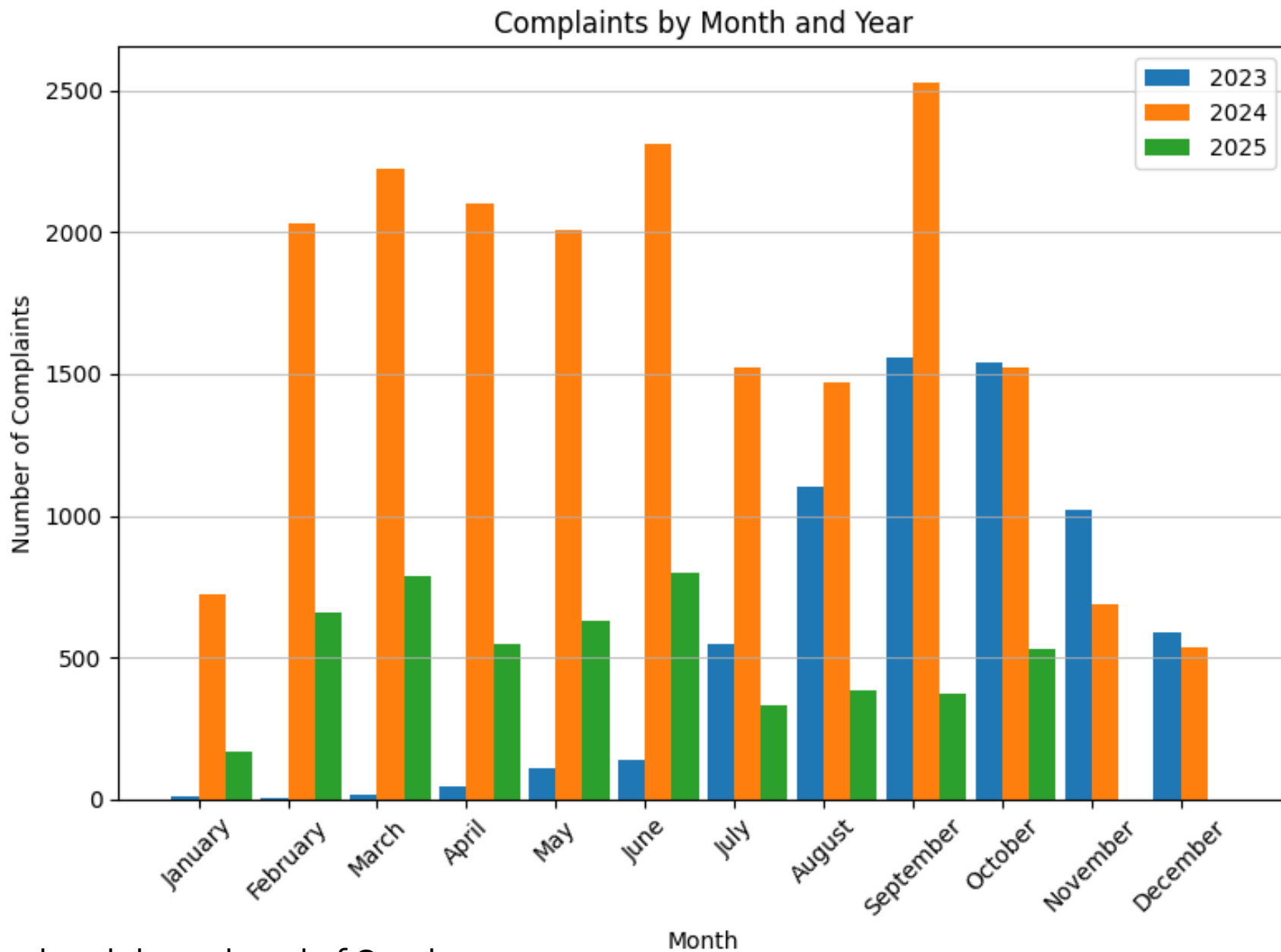


*Data updated through end of October

Odor Surveillance & Complaints – Exact Addresses



*Data updated to 09-04-25



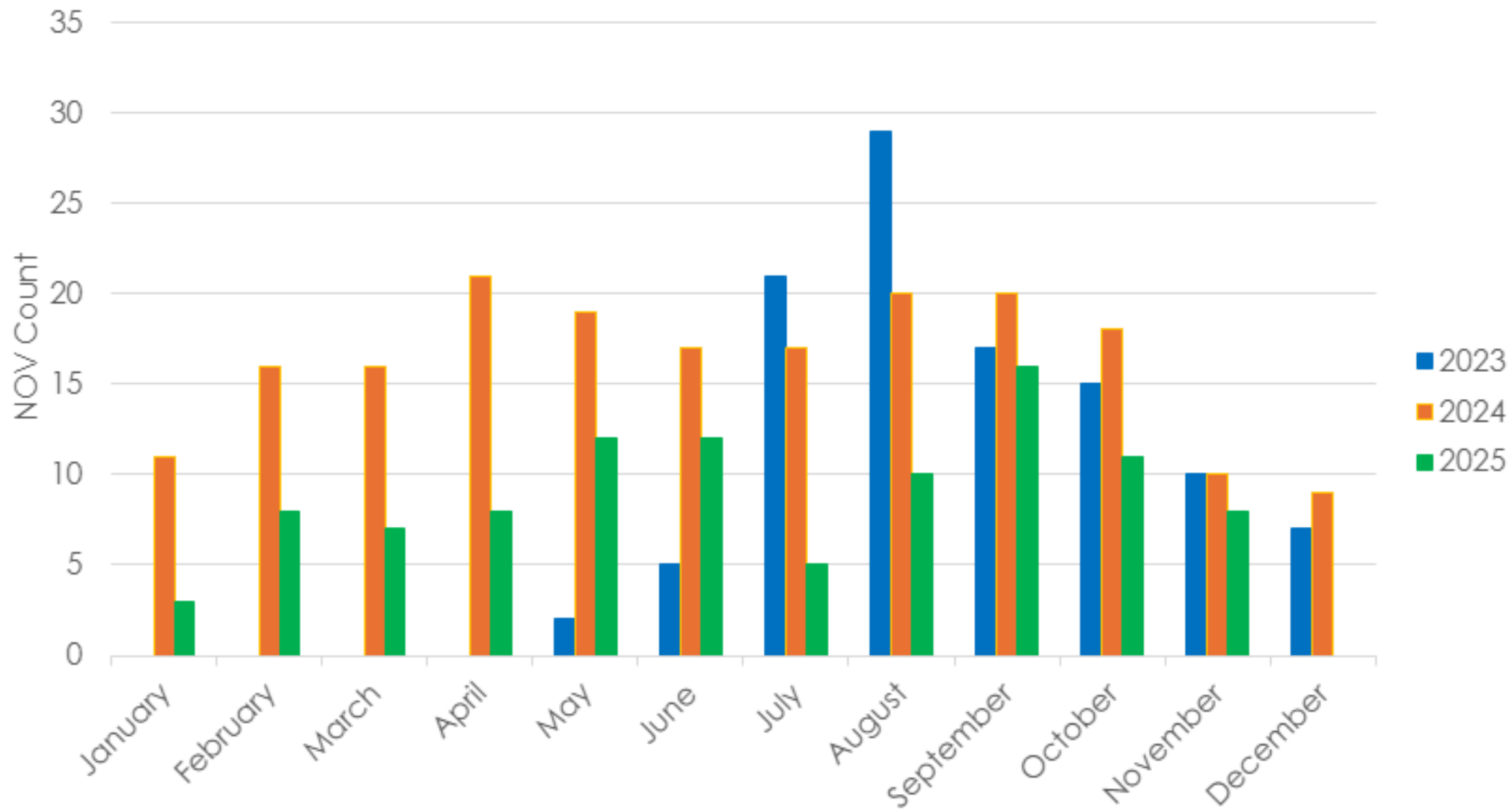
*Data updated through end of October

Complaint Statistics

- ~ 26,000 complaints with address information
- Top 1% of addresses (31 addresses) accounted for over 28% of total complaints
- 99 addresses = half of total complaints
- 20 addresses = half of complaints resulting in an NOV
- 1 address = 287 complaints in 2024 alone

*Data updated to 09-04-25

Rule 402 NOVs by Month and Year



*Data updated through end of November