

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.  
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**Case No. 6177-4**

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

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

May 7, 2026

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

## **SUMMARY REPORT - POST ELEVATED AIR CONCENTRATION EVENT INVESTIGATION: MS-12, May 2, 2026**

### **Summary of Event**

On Saturday, May 2, 2026, benzene was recorded above the Office of Environmental Health Hazard Assessment acute Reference Exposure Level (REL) of 8 parts per billion (ppb) with a reading of 9.0 ppb between the hours of 6 AM to 7 AM at MS-12. This event was accompanied by a public notification (Notification ID 301035-3073) distributed through Chiquita's alert subscription list. An initial notification response from SCS Engineers (SCS) was sent to the South Coast Air Quality Management District (SCAQMD) on May 4, 2026, which was the next business day.

### **Investigation**

On Saturday May 2, 2026, SCS was notified of the elevated benzene levels at MS-12. SCS began the formal investigation of the event with additional data review and discussions with on-site personnel to inquire as to site activities, flare operations, and local conditions to determine if any on-site occurrences could be the source of the reading.

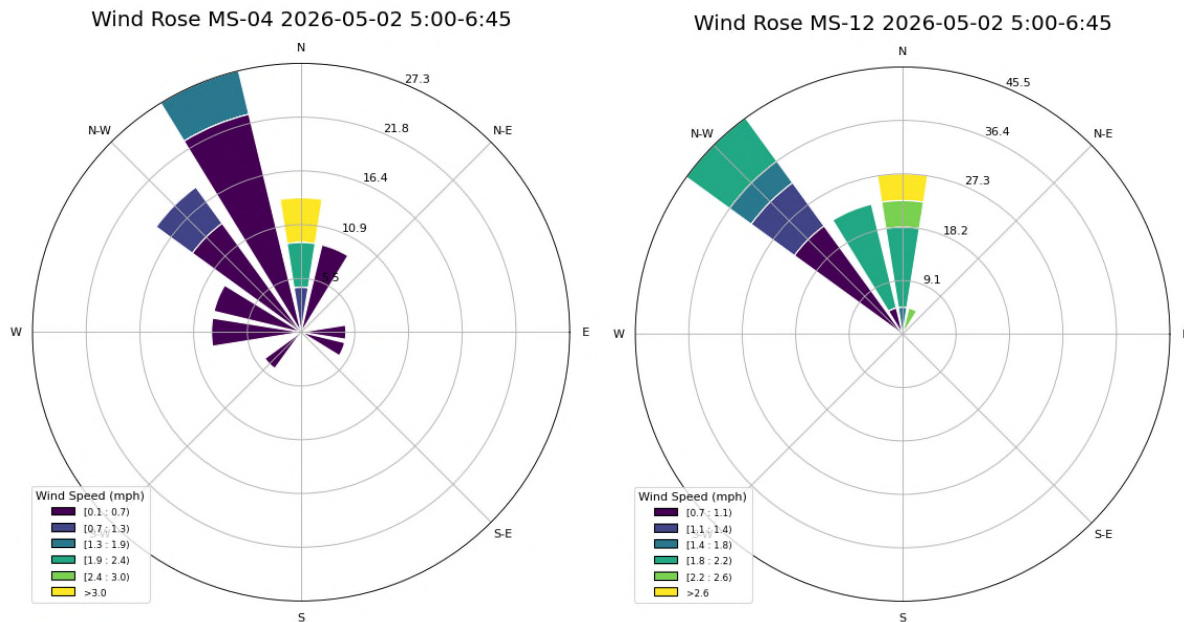
During the event, as well as the time leading up to the event, the landfill gas collection and control system destruction devices (3 flares and 3 thermal oxidation units) were all online and operating normally. The most recent downtime prior to the event was at Flare No. 3 on May 1, 2026 at 9:00 AM for a duration of less than 20 minutes.

The investigation also included discussions with onsite technicians to determine if any other activity at the landfill could be related to this event. A review of the landfill gas collection and control system vacuum and the various pressure transmitters indicated no abnormal activity. Onsite technicians were not aware of any other activity or issues that could have been related to this event.

The investigation also included a review of the camera footage at MS-12. Multiple cars drove past MS-12's location during the sampling period, but none stayed in the area. No other activity of note was observed during the period.

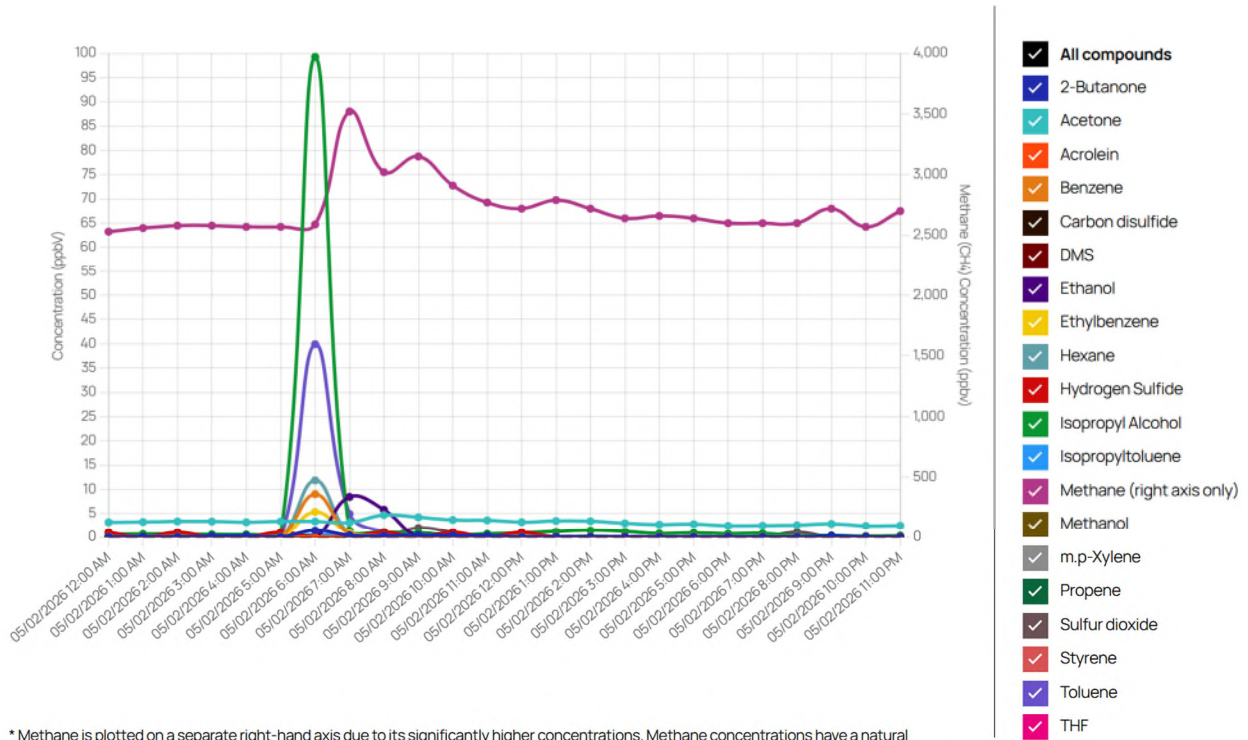


Figure 1. Wind Rose for MS-04 and MS-12, 5 AM to 6:45 AM, May 2, 2026



As shown in **Figure 1** above, MS-12 was upwind (i.e., not along the path of wind travel) from the landfill. The wind data displayed ends at 6:45 AM, because the air monitors stop sampling roughly 15-20 minutes before the end of the hour in order to analyze the sample. The previous hour (5 AM - 6 AM) was included in order to capture any air movement that may have occurred before the sample began. SCS also conducted an analysis for MS-04, located on the north-west border of the landfill, which is between MS-12 and the center of the landfill. As discussed below, MS-04 did not have elevated benzene levels at the time of the event. Similar wind patterns were also observed at MS-04 during the same period suggesting wind was predominantly coming from the north-west region, suggesting the landfill was not upwind of either MS-04 and MS-12 during this event.

Figure 2. Graph of Compounds at MS-12 on May 2, 2026

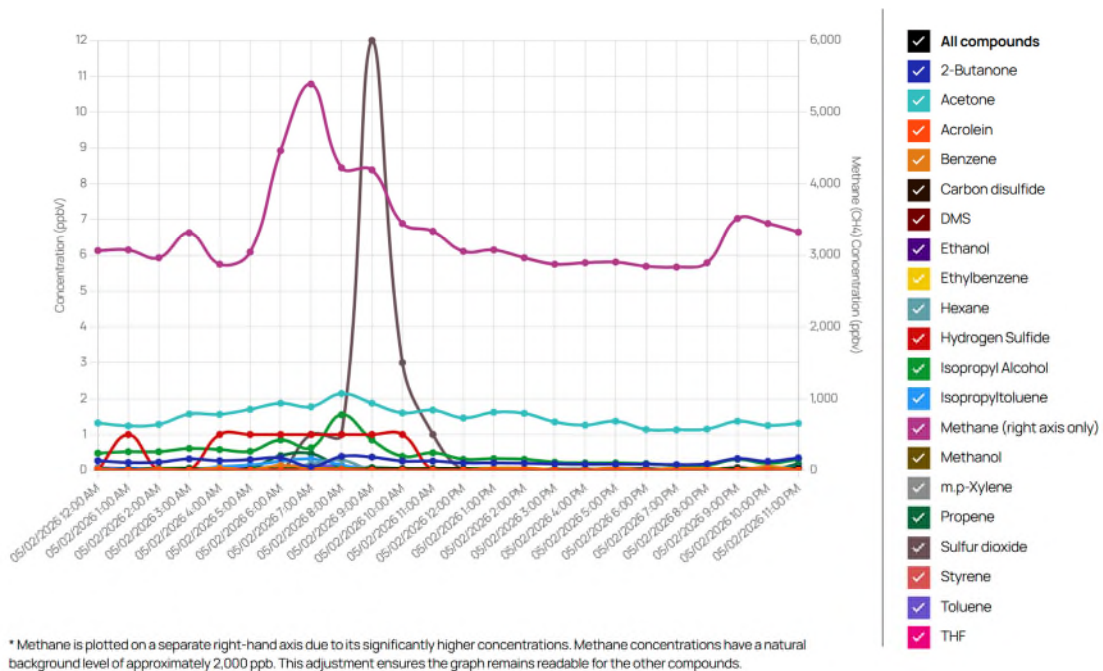


\* Methane is plotted on a separate right-hand axis due to its significantly higher concentrations. Methane concentrations have a natural background level of approximately 2,000 ppb. This adjustment ensures the graph remains readable for the other compounds.

Figure 2 presents MS-12’s May 2 air monitoring data, as displayed on the Chiquita Community Air Monitoring program website. The data show a sharp increase in multiple compounds recorded by the Micro GC during the 6 AM sampling period, followed by a return to normal concentrations.

Methane concentrations during the 6 AM sampling period remained stable, including when evaluated at the minute-data level, but increased during the 7 AM sampling period following the event. If this event had been caused by landfill gas, a concurrent increase in both methane and benzene would typically be expected. It should also be noted that morning methane increases are common and are not unique to this event.

Figure 3. Graph of Compounds at MS-04 on May 2, 2026

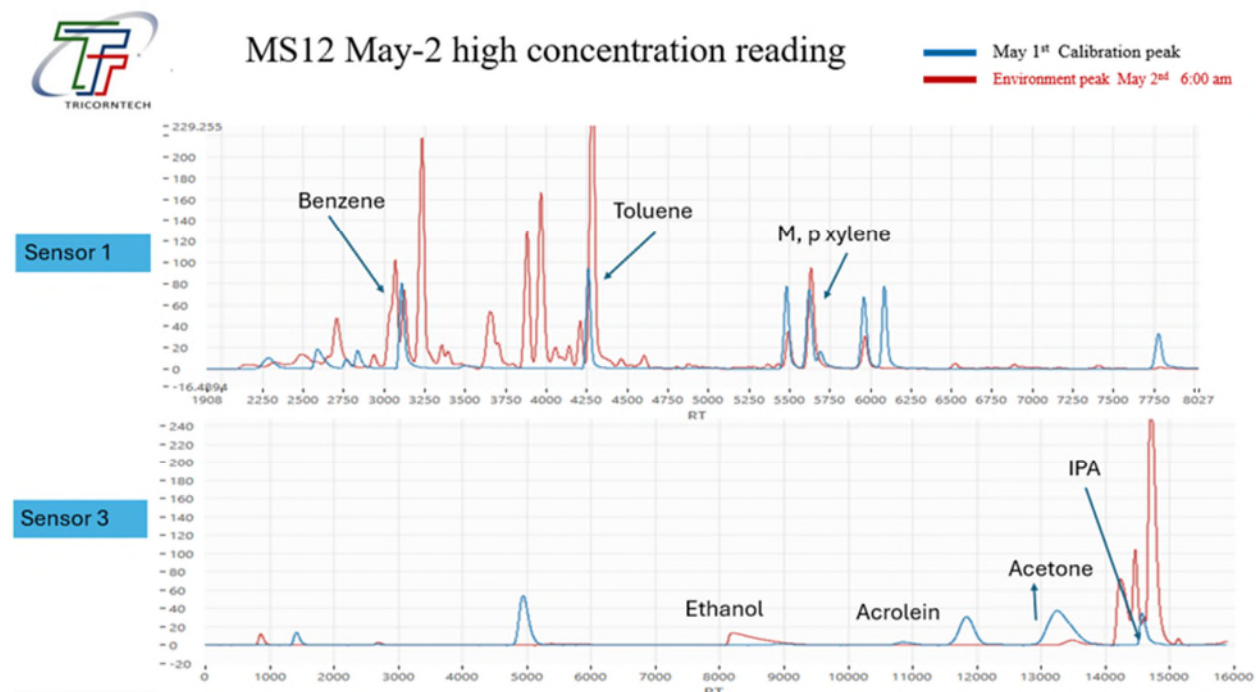


As discussed previously, the data analysis was also performed for MS-04, located along the northwestern boundary of the landfill. Similar impacts would be expected at this location if the landfill were the source of the event, because MS-04 would be along the path that the gas would have to travel. If the landfill had been the source of this event, impacts at MS-04 would likely have been observed during or prior to the event at MS-12. However, as shown in **Figure 3**, GC compound concentrations were relatively low in the hours preceding the event. Benzene concentrations were measured at 0 and 0.14 ppb, at 5 AM and 6 AM respectively, suggesting the landfill was not the source.

MS-04 exhibited stable methane readings before 6 AM but did exhibit somewhat elevated methane concentrations at 6 AM and 7 AM. As stated above, methane increases in the morning are common at this site. The elevated methane at 6 AM and 7 AM at MS-04 combined with the elevated methane at MS-12 at 7 AM, does provide evidence for possible methane migration from MS-04 to MS-12. However, this migration was only detected at MS-12 after 7 AM, which is after the benzene event occurred. Additionally, these readings are unlikely to be related to the elevated benzene concentrations observed at MS-12 during the 6 AM sampling period because there were no accompanying significant increases in benzene concentration at MS-04.

As part of the ongoing QA/QC procedures, Tricorn Tech (TCT) began an investigation of the event on Monday, May 4, 2026. TCT's investigation included reviewing the gas chromatograms for MS-12 from the period between the May 1, 2026 calibration and the May 2 event. As shown in **Figure 4**, the blue curve represents the May 1, 2026, calibration curve, while the red curve represents the ambient air sample. Following their review, TCT determined that the benzene reading was valid as the environmental peak was observed within the expected retention time following the May 1, 2026 calibration.

Figure 4. MS-12 Chromatogram – May 1 and 2, 2026



## Conclusions

Based on a review of on-site activities, wind direction, air monitoring data, and QA/QC analysis, SCS and TCT have concluded that the elevated benzene levels at MS-12 on May 2, 2026, was an accurate reading.

The downtime associated with Flare No. 3 on May 1 is not believed to be a contributing factor to the event recorded on May 2 due to its short duration and occurrence almost 20 hours preceding the event. Wind patterns during the time of the event indicate that MS-12 was upwind from the landfill during the period of the event. The event period was also not preceded by rising concentrations and immediately returned to expected levels following the event period.

These patterns and conditions are not characteristic of emissions migrating from the site. Rather, the analysis of the event suggests a source upwind to the north-west of MS-12 and the landfill which introduced the observed concentrations and dissipated in a short period of time. The absence of correlating elevated benzene concentrations at MS-04 also support the conclusion that the elevated benzene detections at MS-12 on May 2 did not originate from the landfill.