

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.
12

Case No. 6177-4

**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

13 I, Patrick Sullivan, 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 serve as an air
18 quality and landfill gas specialist and Senior Vice President with SCS Engineers, Inc. (“SCS”). I have
19 36 years of experience in the area of environmental consulting, specializing in solid waste
20 management. My company, SCS, has been contracted by Chiquita Canyon, LLC (“Chiquita”) to
21 operate and maintain the landfill gas collection and control system at the Chiquita Canyon Landfill (the
22 “Landfill”). I have been working on Chiquita’s landfill gas collection and control system and related
23 compliance activities for over twenty years.

24 3. I serve on the Reaction Committee as the subject matter expert for the landfill gas
25 collection and control system and air quality compliance.

26 4. This declaration is made for the status and modification hearing being held on May 28,
27 2026 on the Stipulated Order for Abatement in Case No. 6177-4 with the South Coast Air Quality
28

1 Management District (“South Coast AQMD”), most recently modified on December 9, 2025 (“Modified
2 Stipulated Order”).

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

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

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

9 7. As required by **Condition 83(a)**, my team and I conducted a continued study covering
10 the period from January 1, 2025 through October 31, 2025 of the potential emissions impacts to the
11 surrounding community of certain specified operational events. These events included leachate exposure
12 to the atmosphere via seeps, spills, and pressurized leachate releases, landfill excavation activities,
13 downtime or decreased operation of landfill gas collection or control equipment, and leachate/gas
14 collection leak testing events. To determine potential emissions impacts, we reviewed landfill
15 operational records, meteorological data, landfill gas collection and control system flow data, and
16 continuous air monitoring data collected from the 12 monitoring stations located around the perimeter of
17 the Landfill and in the surrounding community. For each category of operational event, we evaluated the
18 most significant events based on emission and air impact potential, compared air monitoring data before,
19 during, and after those events, and considered the monitoring station or stations most likely to be
20 impacted based on the event location, wind speed, wind direction, and topography.

21 8. We found that small leachate leaks and spills likely have little to no impact on air quality,
22 while larger leachate leaks and spills, those greater than 1,000 gallons in volume (accounting to less than
23 5% of leachate leaks and spills during the study period), seem to correlate with increased constituent
24 detections. It appears that the strongest correlation exists between landfill gas system downtime and air
25 impacts. Specifically, the data showed air quality impacts when landfill gas flow decreased by
26 approximately 4,000 standard cubic feet per minute (“scfm”). We also found minimal to no correlation
27 between individual component leak events and air impacts. Chiquita did not conduct any landfill
28

1 excavation events during the study period. Based on these findings, we recommended continued
2 consideration of landfill gas collection and control system downtime in evaluating air monitoring
3 exceedance events because such downtime correlates with increased constituent detections. A true and
4 correct copy of the Continued Landfill Operations Air Study report, which was submitted to South Coast
5 AQMD on January 30, 2026, is attached hereto as **Exhibit A**.

6 9. In accordance with **Condition 100**, SCS completed a feasibility proposal to assess the
7 viability and functionality of a leachate vapor recovery and control system. The purpose of the
8 assessment was to determine the technical feasibility of installing mechanical components connecting
9 the ports of tank trucks to a vapor recovery system, sampling and testing vapors from the tanker trucks,
10 evaluating the viability of routing vapors to Chiquita’s existing landfill gas control devices or alternative
11 control devices, and evaluating operational durability and safety associated with frequent connection and
12 disconnection of vapor recovery equipment. This feasibility proposal was submitted to South Coast
13 AQMD on January 16, 2026. To my knowledge, we have not yet received a response from South Coast
14 AQMD. A true and correct copy of the feasibility proposal is attached hereto as **Exhibit B**.

15 10. As required by **Condition 12(i)**, since my last declaration, the Reaction Committee
16 conducted two additional flux chamber studies, the first on November 10-25, 2025, and the second on
17 March 16-20, 2026. I submitted reports on these two studies to South Coast AQMD on January 23 and
18 May 15, 2026, summarizing each study and comparing the results of each study to the prior flux
19 chamber studies. True and correct copies of these reports are attached hereto as **Exhibits C and D**.
20 The table below summarizes the results of the site-wide emission rates for compounds tested in the
21 November 2025 (Test Event 6) and March 2026 (Test Event 7) flux chamber studies in comparison with
22 the prior five studies conducted in August 2023, March 2024, November 2024, March 2025, and July
23 2025. This table shows an overall trending decrease in emissions from August 2023 to March 2026 for
24 almost every compound measured.

Compound	Units	Test Event						
		1 (8/23)	2 (3/24)	3 (11/24)	4 (3/25)	5 (7/25)	6 (11/25)	7(3/26)
Carbon dioxide	tons/yr	41,312	327,049	216,177	100,526	46,702	92,157	95,819
Methane	tons/yr	3,357	11,456	6,880	4,756	285	2,979	3,804
Total VOC	tons/yr	207	853	61	26	2.6	4.39	17.46
Methanol	tons/yr	9.09	<4	0.51	0.79	0.45	0.34	5.59
Acetone	tons/yr	17.64	50.66	1.30	1.38	0.54	0.69	2.30
Benzene	tons/yr	9.33	104.31	0.27	0.90	0.14	0.20	2.04
2-Butanone (MEK)	tons/yr	9.06	51.20	0.24	0.30	0.07	0.14	1.13
Total Xylenes	tons/yr	1.52	9.79	0.30	0.48	0.08	0.10	1.13
Tetrahydrofuran	tons/yr	13.62	106.99	0.06	0.23	0.01	0.12	1.01
Dimethyl Sulfide	tons/yr	15.16	57.90	0.93	0.95	ND	0.84	0.90
Ethylbenzene	tons/yr	1.14	10.07	0.16	0.20	0.03	0.05	0.77
Toluene	tons/yr	2.00	18.64	0.22	0.29	0.06	0.11	0.75
Isopropyltoluene	tons/yr	3.72	15.23	0.18	0.51	<0.05	0.14	0.71
Nonane	tons/yr	<0.1	<4	<0.05	<0.05	<0.05	0.05	0.27
Hydrogen Sulfide	tons/yr	0.13	3.81	0.72	0.24	0.15	0.40	0.20
Propylene (Corrected)	tons/yr	6.62	29.82	0.69	0.41	0.05	0.08	0.19
Octane	tons/yr	<0.1	<4	<0.05	<0.05	<0.05	0.05	0.17
Acrolein	tons/yr	NA	NA	NA	NA	0.05	0.07	0.16
n-Heptane	tons/yr	<0.1	<4	<0.05	<0.05	<0.05	0.05	0.15
Chloroform	tons/yr	<0.1	<4	<0.05	<0.05	<0.05	0.05	0.10
Cyclohexane	tons/yr	<0.1	<4	<0.05	<0.05	<0.05	0.03	0.10
Hexane	tons/yr	<0.1	<4	<0.05	<0.05	<0.05	0.09	0.04
1,2-Dichloroethane	tons/yr	<0.1	<4	<0.05	<0.05	<0.05	0.02	0.03
Chloroethane	tons/yr	<0.1	<4	<0.05	<0.05	<0.05	0.03	0.02
Trichloroethene (TCE)	tons/yr	<0.1	<4	<0.05	<0.05	<0.05	1.07	0.02

11. This overall downward trend is likely attributable to Chiquita’s improvements in gas recovery and cover systems, including the installation of the 30-mil geosynthetic cover and over 40 acres of the ethylene vinyl alcohol (“EVOH”) cover. I stated in my previous declaration that the laboratory results from the more recent studies were close to or below the detection limits for most of the compounds tested, meaning that further reductions likely will not be detected for those compounds. This remains accurate.

12. The July 2025 flux chamber study (Test Event 5) represented the low point in measured emissions for many constituents. The subsequent November 2025 and March 2026 studies (Test Events 6 and 7) show slight increases for certain constituents, including methane, carbon dioxide, total volatile organic compounds (“VOCs”), and certain individual VOCs. Those increases, however, do not change the overall trends observed since the earlier testing events, which show a substantial reduction in

1 emissions following improvements to the gas recovery and cover systems. During the November 2025
2 test (Test Event 6), there were up to 40 landfill gas wells offline due to EVOH liner installation, which
3 likely affected emissions in the liner installation area. The May 2026 report covering the March 2026
4 study (Test Event 7) identified specific conditions that likely contributed to the recent increases,
5 including reduced gas recovery in certain grid cells, instantaneous surface emission exceedances that
6 were corrected only after flux testing had occurred, and a positive pressure well in another grid cell,
7 which was also not corrected until after testing was complete. In my opinion, these conditions explain
8 the modest recent increases without undermining the broader conclusion that the Landfill's current
9 surface emissions remain substantially reduced from the earlier testing events. The emissions data from
10 these most recent testing events are consistent with what would be expected from a typical, non-reaction
11 landfill.

12 //

13 //

14 //

15 //

16 //

17 //

18 //

19 //

20 //

21 //

22 //

23 //

24 //

25 //

26

27

28

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 Carmichael, California.

4
5
6 

7 _____
8 Patrick Sullivan
9 Senior Vice President
10 SCS Engineers
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

**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 PATRICK SULLIVAN, BCES, CPP,
REPA**

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
4	Maximize landfill gas combustion and prioritize and maximize the use and operation of Flares 3 and 4 over Flares 1 and 2, and Flare 2 over Flare 1.	Compliance ongoing since November 15, 2023 when Flare 3 was put into operation.
5	Sample, analyze, and record the landfill gas sulfur compounds combusted in any landfill gas control equipment operating onsite daily and weekly based on analytical method.	Compliance ongoing; see Section W of Condition 8 reports, which are posted on Chiquita's Odor Mitigation website (https://chiquitacanyon.com/odor-mitigation/).
5	Sample, analyze, and record monthly the landfill gas sulfur compounds and speciated organic compounds found in the raw, pre-treatment and pre-control, landfill gas collected from the Reaction Area.	Compliance ongoing; see Section W of Condition 8 reports, which are posted on Chiquita's Odor Mitigation website.

Condition No.	Summary of Requirement(s)	Status
6	Maintain an adequate stock of appropriately ranged colorimetric tubes.	Compliance ongoing.
7	Maintain records of landfill gas flow combusted, landfill gas flow not flared, and sulfur sampling analysis, results, and readings.	Compliance ongoing; see Section B of Condition 8 reports, which are posted on Chiquita's Odor Mitigation website.
8	Submit monthly written reports containing information on landfill gas and leachate temperature, composition, and flow/quantity; leachate seepage; surface emissions monitoring; treatment of landfill gas and leachate; the landfill gas collection and control system; the leachate collection and management system; leachate disposal; landfill and geosynthetic covers; and excavation.	Compliance ongoing; most recently submitted on November 20, 2025, December 22, 2025, January 20, 2026, February 20, 2026, March 20, 2026, April 20, 2026, and May 20, 2026. True and correct copies of these reports are attached hereto as Exhibits E through K and are posted on Chiquita's Odor Mitigation website.
9	Conduct integrated surface emission monitoring across the Reaction Area at least three times per month and across the remainder of the landfill at least four times per quarter.	Compliance ongoing; see Section C of Condition 8 reports, which are posted on Chiquita's Odor Mitigation website.
10	Conduct instantaneous surface emissions monitoring across the Reaction Area at least three times per month and across the remainder of the landfill at least four times per quarter.	Compliance ongoing; see Section C of Condition 8 reports, which are posted on Chiquita's Odor Mitigation website.
11	Continue operating the flares and landfill gas treatment system even if the emitted landfill gas exceeds Chiquita's limits on total reduced sulfur and sulfur oxides.	Compliance ongoing.
11	Submit deviation reporting associated with sulfur exceedances.	Compliance ongoing.

Condition No.	Summary of Requirement(s)	Status
12(g)(i)	Submit expert report on known and possible methods for effective treatment of dimethyl sulfide (“DMS”) and preventative mechanisms for DMS formation in landfill gas.	Completed; submitted on April 30, 2024 and posted on Chiquita’s Odor Mitigation website.
12(g)(iii)	Submit expert report on the feasibility and availability of a continuous community emission monitoring system for DMS.	Completed; submitted report on December 1, 2023; submitted Reaction Committee recommendation on December 31, 2023. Both the report and the recommendation are posted on Chiquita’s Odor Mitigation website.
12(i)	Submit a report documenting the findings of the initial flux chamber study conducted pursuant to the direction of the Los Angeles County Department of Public Health (“DPH”).	Completed; submitted on October 31, 2023 and posted on Chiquita’s Odor Mitigation website.
12(i)	Prepare testing protocols, provide notices of test dates, conduct studies, and submit reports for an additional and ongoing (once every four months) flux chamber studies for methane, non-methane organic compounds (“NMOC”), toxic air contaminants (“TAC”), total reduced sulfur (“TRS”), and speciated sulfur compounds.	Compliance ongoing; protocols most recently submitted on May 11, 2026. A true and correct copy of the protocols is attached hereto as Exhibit L . The reports were most recently submitted on January 23 and May 15, 2026. True and correct copies of these reports are attached hereto as Exhibits C and D and are posted on Chiquita’s Odor Mitigation website.
14	Monitor each landfill gas collection system well at least monthly for at least temperature pursuant to 40 CFR Part 63 Subpart AAAA and address wells with a temperature reading of at least 170 degrees Fahrenheit or greater.	Compliance ongoing.
14(a)	Ensure the operation of the landfill gas collection system equipment does not result in the release of raw landfill gas or condensate into the atmosphere.	Compliance ongoing.

Condition No.	Summary of Requirement(s)	Status
14(b)	Report any breakdown or malfunction of the landfill gas collection system resulting in the emission of raw landfill gas and undertake immediate remedial measures.	Compliance ongoing.
15(k)	Operate gas extraction wells with less than 3 percent oxygen where feasible, and follow landfill best management practices to keep oxygen below 5 percent in interior wells.	Not yet in effect; once additional/adequate gas extraction capacity is installed.
16	Submit a permit modification application for the Landfill Gas Collection System to increase the number of permitted wells in the wellfield.	Completed; submitted on October 5, 2023; updates submitted biweekly.
19	Submit a permit modification application to the Landfill Gas Condensate and Leachate Collection/Storage System to increase the landfill's liquid storage capacity.	Completed; submitted on October 4, 2023; updates submitted biweekly.
20	Increase landfill gas control capacity and install and begin operating Flare 3.	Compliance ongoing; Flare 3 was installed and in operation by November 15, 2023; notification submitted by November 17, 2023.
21	Submit a permit application for the new construction of Flare 4 to increase the landfill gas control capacity.	Completed; submitted on October 30, 2023; updates submitted biweekly.
22	Continue to use one or multiple portable thermal oxidizers ("TOX") that operate under a permit or temporary permit to operate until the Reaction Committee concludes they are no longer needed.	Compliance ongoing; notification re Envent TOX submitted on February 15, 2024; determination re Parnel TOX submitted on March 3, 2025; determination re Hero TOX submitted on June 3, 2025. These determinations are posted on Chiquita's Odor Mitigation website.
23	Continue to use one or both of Flares 1 and 2 when the Reaction Committee determines that such use is necessary due to insufficient flaring capacity or	Compliance ongoing.

Condition No.	Summary of Requirement(s)	Status
	other such necessity-based situations, until Flare 5 is permitted and operational.	
33	Follow DPH's direction to expand and enhance Chiquita's community air monitoring program and submit reports submitted to DPH under this program to South Coast AQMD.	Compliance ongoing; reports are posted on Chiquita's Odor Mitigation website.
34	Provide South Coast AQMD with access to all real-time continuous monitoring data and post certain weekly concentration data on Chiquita's website; make weekly data collected available upon request; in the event of downtime, provide indicators on Chiquita's website.	Compliance ongoing; see Chiquita's Community Air Monitoring Program website (https://chiquitacanyon.com/reports/community-air-monitoring-program/).
34(c)	The third party developer of the automatic electronic notification system shall revise the system to provide an automatic electronic notification every hour during which the applicable time weighted average continues to be above the applicable REL.	Completed; developed by December 31, 2025; compliance ongoing; see Chiquita's Community Air Monitoring Program website (https://chiquitacanyon.com/reports/community-air-monitoring-program/).
34(c)(i)	Revise the system under Condition 34(c) to provide an automatic electronic notification every hour during which the applicable time weighted average continues to be above the applicable REL and to provide notifications via text.	Completed; developed by December 31, 2025; compliance ongoing; see Chiquita's Community Air Monitoring Program website (https://chiquitacanyon.com/reports/community-air-monitoring-program/).
34(d)	Investigate and submit reports on any measurement which results in an exceedance notification being distributed as defined in Condition 34.	Compliance ongoing; reports most recently submitted on December 29, 2025 and May 7, 2026. True and correct copies of these reports are attached hereto as Exhibits M and N .
34(e), 34(f)	Retain sufficient third-party support to ensure that all CH4, H2S, PM,	Completed; retained by December 31, 2025; compliance ongoing.

Condition No.	Summary of Requirement(s)	Status
	meteorological sensors, and microGC instruments meet data quality objectives and are maintained, calibrated, and replaced in accordance with the instruments' standard operating procedures or quality assurance documentation; third party must provide instrument data for Condition 34(d) reports.	
35	Provide all Standard Operating Procedures (“SOP”) and any other Quality Control and Quality Assurance (“QA/QC”) documents describing the operation and maintenance of all instruments used at the air monitoring stations.	Completed; submitted by January 19, 2024; see updates, calibration log, and maintenance activities in Section S of Condition 8 reports, which are posted on Chiquita’s Odor Mitigation website.
35(a)	Provide South Coast AQMD with the same access that Chiquita has to onsite and offsite monitoring equipment; provide list of appropriate PPE upon request.	Compliance ongoing.
35(b)	Implement quality control measures as specified by South Coast AQMD to ensure the accuracy of the monitoring network within 30 days of notification.	Compliance ongoing.
36, 36(a)	Install and maintain instrumentation within the nearby community capable of measuring hourly concentrations of certain pollutants above a given threshold; develop a monitoring plan and provide installation updates to South Coast AQMD; make data available on Chiquita’s website.	Compliance ongoing; installation completed by May 1, 2024; monitoring plan completed on April 29, 2024; see Chiquita’s Community Air Monitoring Program website.
36(b)	Until the MicroGCs are installed, increase the number of 24-hour time integrated canister samples for volatile organic compounds at the offsite stations to three times per week.	Completed.

Condition No.	Summary of Requirement(s)	Status
36(c)	Make the MicroGCs installed pursuant to Condition 36 capable of measuring hourly concentrations of acrolein.	Completed; see Chiquita's Community Air Monitoring Program website.
36(d)	Procure an additional microGC instrument package and two additional sensor modules to be used as spares and maintain in operational condition.	Completed; procured by March 31, 2026; compliance ongoing.
41	Submit an application for a Rule 1150 Landfill Excavation Plan.	Completed; submitted on January 30, 2024.
42	Pending approval of Rule 1150 Landfill Excavation Plan, comply with additional requirements for all Rule 1150(a)(5) excavation.	Compliance ongoing.
44	Obtain, install, and maintain an onsite landfill meteorological station to measure wind speed and direction; record and preserve all available readings for 3 years and make available to the South Coast AQMD upon request.	Compliance ongoing; installation completed by October 31, 2023.
52	Reserve 60 minutes biweekly to host a virtual meeting between South Coast AQMD technical staff and Chiquita / Chiquita's technical consultants.	Compliance ongoing.
54	Collect, convey, and store any condensate collected after the sulfur treatment carbon absorbers separately from landfill leachate.	Compliance ongoing.
55	Immediately cease injection of landfill gas condensate into the landfill gas control flares, unless the condensate injection is initially performed for the purposes of a source test required under this condition.	Compliance ongoing.
56	Conduct sampling and analysis of vapors in the headspace of leachate tanks located in the Top Deck Tank	Completed; sampling conducted by April 4, 2024; report submitted on April 18, 2024; revised on April 24, 2024. The reports are

Condition No.	Summary of Requirement(s)	Status
	Farm (Tank Farm #9) and submit a report on the parameters and results.	posted on Chiquita's Odor Mitigation website.
57	Submit a permit modification application to increase the landfill's liquid storage capacity.	Completed; submitted by April 22, 2024; updates submitted biweekly.
58	Submit a permit application for the operation of the thermal oxidizer.	Completed; submitted by June 21, 2024; updates submitted biweekly.
59	Submit a permit application for treating hazardous liquid waste.	Completed; submitted by June 21, 2024; updates submitted biweekly.
60	Submit a permit modification application to include the tie-in of vapor vent lines to the Landfill Gas Collection System.	Completed; submitted by April 22, 2024; updates submitted biweekly.
61, 62	Submit permit modification applications to include the combustion of vapor vented from the hazardous liquid tanks.	Completed; submitted by May 21, 2024; updates submitted biweekly.
69	Conduct quarterly inspections and monitoring of the landfill's piping and any associated piping components; maintain records of this monitoring activity.	Compliance ongoing; most recently completed by January 19 and April 19, 2026.
69	Submit a recommendation to modify the frequency of such.	Completed; submitted on August 1, 2025 and posted on Chiquita's Odor Mitigation website.
70	Submit an expert report on the landfill's current and projected landfill gas generation through the end of calendar year 2029.	Completed; submitted on June 28, 2024 and posted on Chiquita's Odor Mitigation website.
70(a)	Submit a permit application for the new construction of Flare 5, and modifications of Flares 1 through 4, to the extent necessary.	Completed; submitted by October 31, 2024; updates submitted biweekly.
71	Submit a permit application for the installation and operation of any above ground surface landfill gas collection system, or underground landfill gas	Completed; submitted by May 21, 2024; updates submitted biweekly.

Condition No.	Summary of Requirement(s)	Status
	collection system.	
72(a)	Conduct quarterly sampling and analysis of the vapor flow in the piping used to vent the liquid storage tanks and route the vapors to the landfill gas control system.	Compliance ongoing; see Section V of Condition 8 reports, which are posted on Chiquita's Odor Mitigation website.
72(b)	Submit a source test protocol for this testing.	Completed; submitted by May 17, 2024; revised on July 12, 2024.
72(b)	Conduct testing within 45 days of receiving approval of the source test protocol.	Compliance ongoing; most recently completed on November 24, 2025 and March 30, 2026.
72(b)	Submit the final results in a source test report format within 30 days of testing.	Compliance ongoing; most recently submitted on December 24, 2025 and April 28, 2026 and posted on Chiquita's Odor Mitigation website. True and correct copies of these reports are included as Exhibits O and P .
72(c)	Within 30 days of submission of the source test report, submit a recommendation from the Reaction Committee on additional vapor flow testing.	Compliance ongoing; most recently submitted on May 16, 2025 and posted on Chiquita's Odor Mitigation website.
72(e)	Install flow meters within the HDPE piping headers for associated leachate tank farms; submit daily flow rate.	Compliance ongoing; installed by July 19, 2024; see Section V of Condition 8 reports, which are posted on Chiquita's Odor Mitigation website.
73	Prepare and submit an inventory of all internal combustion engine equipment rated greater than 50 horsepower, permit applications for all such equipment not already permitted as of June 30, 2024, and permits for such equipment brought onsite on an ongoing basis.	Compliance ongoing; submitted inventory on May 21, 2024 and posted on Chiquita's Odor Mitigation website; submitted initial permit application on June 30, 2024; updates submitted biweekly.

Condition No.	Summary of Requirement(s)	Status
74	Expedite the procurement of the equipment needed to construct Flare 4; provide updates.	Compliance ongoing; see Section X of Condition 8 reports, which are posted on Chiquita's Odor Mitigation website.
76	Install sample ports on all equipment onsite that requires sampling and collect samples from the sampling ports thereafter.	Compliance ongoing; initially installed by December 2, 2024.
77	Conduct aerial surveillance over the entire landfill surface on a monthly basis, and over the Condition 9(a) Reaction Area on a weekly basis.	Compliance ongoing; see Section C of Condition 8 reports, which are posted on Chiquita's Odor Mitigation website.
79	Submit any submittal requiring South Coast AQMD review and approval with expedited processing/review requested.	Compliance ongoing.
80, 80(a)	Whenever South Coast AQMD permitted Various Location equipment or CARB Statewide Portable Equipment Registration ("PERP") permitted equipment is brought onsite, operated, or removed from the site, notify South Coast AQMD in the corresponding Condition 8 monthly report; maintain a daily log of permitted equipment and submit in the monthly Condition 8 report.	Compliance ongoing; see Section Y of Condition 8 reports, which are posted on Chiquita's Odor Mitigation website.
81	Provide notification to the community whenever any landfill gas collection and control equipment has planned or unplanned downtime anticipated to last 30 minutes or more.	Compliance ongoing; see Chiquita's Alerts website (https://chiquitacanyon.com/alerts/).
81(c)	Develop a system allowing members of the public to sign-up for notifications of such outages or downtime via email and deploy within 3 days of notification.	Developed by November 18, 2024; deployed by December 10, 2024; compliance ongoing.

Condition No.	Summary of Requirement(s)	Status
82	Provide an initial notification and a follow-up report to South Coast AQMD whenever any landfill gas collection or control equipment has planned and/or unplanned downtime anticipated to last or lasting 30 minutes or more.	Compliance ongoing; see Chiquita's Odor Mitigation website.
83	Submit an expert report on specific landfill operational events and their potential emission impacts to the community.	Completed; submitted on March 31, 2025 and posted on Chiquita's Odor Mitigation website.
83(a)	Conduct a continued study of specific landfill operational events and their potential emission impacts; prepare and submit report detailing the landfill operational events, data, and study findings.	Completed; submitted on January 30, 2026. A true and correct copy of this report is attached hereto as Exhibit A and is posted on Chiquita's Odor Mitigation website.
87	Do not conduct planned landfill gas combustion/control equipment downtime for 3 or more landfill gas control units at any one time, unless approved in writing by South Coast AQMD or where Chiquita is conducting certain specified installation or maintenance work.	Compliance ongoing.
88	Install equipment and implement operational procedures to prevent unplanned landfill gas combustion/control equipment downtime.	Compliance ongoing.
88(a)	Expedite and complete the connection of permanent grid power to the flare station.	Completed by December 31, 2024.
88(b)	Once the flare station is connected to permanent grid power, maintain the existing flare station generators.	Compliance ongoing.

Condition No.	Summary of Requirement(s)	Status
88(b)	Install backup power at the Zeeco TOX.	Completed by December 5, 2024.
88(b)	Once the flare station is connected to permanent grid power and backup power connection safety disconnect is installed at the Zeeco TOX, minimize combustion/control equipment downtime as a result of power failure and follow required start-up procedures.	Compliance ongoing.
90	Submit a permit modification application to the Landfill Gas Condensate and Leachate Collection/Storage System for the relocated tank farm.	In progress; to be submitted within 30 days of the Department of Toxic Substances Control's ("DTSC") approval of the written workplan for the permanent relocated tank farm.
91	Submit a permit application for each hazardous and non-hazardous liquid treatment system.	In progress; to be submitted within 30 days of DTSC's approval of the written workplan for the permanent relocated tank farm.
94	Submit a permit application for the Parnel TOX.	Completed; submitted by May 30, 2025; updates submitted biweekly.
95	Submit a permit modification application to the Landfill Gas Condensate and Leachate Collection/Storage System to increase the landfill's liquid storage capacity and include the Canyon D tank farm.	Completed; submitted by April 30, 2025; updates submitted biweekly.
96	Submit an updated expert report on the landfill's current and projected landfill gas generation through the end of calendar year 2029.	Completed; submitted by April 30, 2025 and posted on Chiquita's Odor Mitigation website.
100	Submit a feasibility assessment proposal to assess the viability and functionality of a leachate vapor recovery and control system to recover leachate vapors; incorporate South	Proposal submitted by January 16, 2026; compliance ongoing.

Condition No.	Summary of Requirement(s)	Status
	Coast AQMD comment(s) on the proposal and submit a revised proposal; upon approval by South Coast AQMD, conduct the feasibility assessment.	
102	Submit a permit application for the removal of tank farm #9, and relocation, construction, and operation of tanks in tank farm #13.	Completed; submitted by December 31, 2025; updates submitted biweekly.
103	Submit a permit application for the hazardous and/or non-hazardous liquid treatment system constructed and operating in tank farm #13.	Completed; submitted by December 31, 2025; updates submitted biweekly.