

Proposed Contested Condition 77 for June 4, 17, and 24, 2025 Status Hearing

South Coast AQMD v. Chiquita Canyon, LLC (Case No. 6177-4)

South Coast AQMD Proposed Language	Chiquita Canyon, LLC Revised Proposed Language
<p>Respondent shall conduct aerial surveillance over the entire landfill surface on a monthly basis, and over the Reaction Area defined in Condition 9(a) on a weekly basis, employing a drone equipped with sensors with a minimum detection level of 1 ppmv methane, and in accordance with OTM-51. If an aerial surveillance reading reaches or exceeds 200 ppmv methane, Respondent shall conduct follow-up ground-based surface emission monitoring field inspections according to the procedures of OTM-51 and U.S. EPA Method 21, unless Respondent is unable to monitor the subject locations due to inaccessibility or dangerous conditions for a technician. The follow-up field inspection shall be performed within 2 hours of becoming aware of aerial surveillance exceedances. If an exceedance of 500 ppmv methane is found or confirmed during the follow-up inspection, Respondent shall implement corrective actions within 2 calendar days, including but not limited to, geosynthetic cover maintenance or repair, landfill cover maintenance or repair, wellfield vacuum adjustments, and piping/gas component maintenance or repair. Respondent shall develop a color-coordinated geospatial methane map displaying the results of the methane readings, a color-coordinated geospatial interpolated methane map displaying the change in methane readings as compared to the prior aerial surveillance, and a map displaying geolocated coordinates with local methane peaks. The methane map</p>	<p>Respondent shall perform, or cause to be performed, a six-month pilot project that conducts aerial surveillance over the entire landfill surface on a monthly basis for six months, employing a drone equipped with sensors with a minimum detection level of 1 ppmv methane, and in accordance with OTM-51 for instantaneous monitoring and a modification of OTM-51 that allows for integrated aerial surveillance monitoring.</p> <ol style="list-style-type: none">The OTM-51 monitoring shall, to the maximum extent feasible, be performed concurrently with the instantaneous monitoring conducted in accordance with Rule 1150.1 and U.S. EPA Method 21. The modified OTM-51 monitoring that allows for integrated aerial surveillance monitoring shall, to the maximum extent feasible, be performed concurrently with the integrated monitoring conducted in accordance with Rule 1150.1.For the instantaneous aerial monitoring, if an aerial surveillance reading reaches or exceeds 200 ppmv methane, Respondent shall conduct follow-up ground-based surface emission monitoring field inspections according to the procedures of OTM-51 and U.S. EPA Method 21, unless Respondent is unable to monitor the subject locations due to inaccessibility or dangerous conditions for a technician. The follow-up field inspection shall be performed within 2 hours of becoming aware of aerial surveillance exceedances. If an exceedance of 500 ppmv methane is found or confirmed during the follow-up inspection, Respondent shall implement corrective actions within 2 calendar days, including but not limited to, geosynthetic cover maintenance or repair, landfill cover maintenance or repair, wellfield vacuum adjustments, and piping/gas component maintenance or repair.

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<p>displaying the results of methane readings shall include a color legend to differentiate locations displaying methane readings of 1) < 200 ppmv, 2) ≥ 200 and < 500 ppmv, 3) ≥ 500 and < 1,000 ppmv, 4) ≥ 1,000 and < 2,000 ppmv, 5) ≥ 2,000 and < 5,000ppmv, and 6) ≥ 5000 ppmv, or as otherwise approved by South Coast AQMD. The interpolated map displaying the change in methane readings shall include a color legend to differentiate the magnitude of the differential reading as determined by Respondent, or as otherwise requested by South Coast AQMD. The maps, follow-up field inspection measurements and locations with associated dates/times, causes of exceedances (500 ppmv methane or greater), any corrective actions performed, and documentation (date, time, reasoning) of field inspections not performed due to inaccessibility or dangerous conditions shall be provided in the subsequent monthly report pursuant to Condition 8(c).</p>	<p>c. For the integrated aerial monitoring, if any individual monitoring grid exceeds an average methane concentration of 10 ppmv methane, Respondent shall conduct follow-up ground-based surface emission monitoring field inspections according to the procedures of Rule 1150.1, unless Respondent is unable to monitor the subject locations due to inaccessibility or dangerous conditions for a technician. The follow-up field inspection shall be initiated within 2 hours of becoming aware of aerial surveillance exceedances. If an exceedance of 25 ppmv methane is found or confirmed during the follow-up inspection, Respondent shall implement corrective actions within 2 calendar days, including but not limited to, geosynthetic cover maintenance or repair, landfill cover maintenance or repair, wellfield vacuum adjustments, and piping/gas component maintenance or repair.</p> <p>d. For the instantaneous aerial monitoring, Respondent shall develop a color-coordinated geospatial methane map displaying the results of the methane readings, a color-coordinated geospatial interpolated methane map displaying the change in methane readings as compared to the prior aerial surveillance, and a map displaying geolocated coordinates with local methane peaks. The methane map displaying the results of methane readings shall include a color legend to differentiate locations displaying methane readings of 1) < 200 ppmv, 2) ≥ 200 and < 500 ppmv, 3) ≥ 500 and < 1,000 ppmv, 4) ≥ 1,000 and < 2,000 ppmv, 5) ≥ 2,000 and < 5,000ppmv, and 6) ≥ 5000 ppmv, or as otherwise approved by South Coast AQMD. The interpolated map displaying the change in methane readings shall include a color legend to differentiate the magnitude of the differential reading as determined by Respondent, or as otherwise requested by South Coast AQMD. The maps,</p>

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	<p>follow-up field inspection measurements and locations with associated dates/times, causes of exceedances (500 ppmv methane or greater), any corrective actions performed, and documentation (date, time, reasoning) of field inspections not performed due to inaccessibility or dangerous conditions shall be provided in the subsequent monthly report pursuant to Condition 8(c).</p> <p>e. For the integrated aerial monitoring, Respondent shall develop a color-coordinated geospatial methane map displaying the results of the average methane concentrations in each grid, and a color-coordinated geospatial interpolated methane map displaying the change in average methane concentrations as compared to the prior aerial surveillance. The methane map displaying the results of the average methane concentrations in each grid shall include a color legend to differentiate locations displaying methane readings of 1) < 10 ppmv, 2) ≥ 10 and < 25 ppmv, 3) ≥ 25 and < 50 ppmv, 4) ≥ 50 and < 100 ppmv, and 5) ≥ 100 ppmv, or as otherwise approved by South Coast AQMD. The interpolated map displaying the change in methane readings shall include a color legend to differentiate the magnitude of the differential reading as determined by Respondent, or as otherwise requested by South Coast AQMD. The maps, follow-up field inspection measurements and locations with associated dates/times, causes of exceedances (25 ppmv methane or greater), any corrective actions performed, and documentation (date, time, reasoning) of field inspections not performed due to inaccessibility or dangerous conditions shall be provided in the subsequent monthly report pursuant to Condition 8(c).</p> <p>f. Following six months of data collection using OTM-51, the modified version of OTM-51 that allows for integrated aerial surveillance monitoring, the instantaneous</p>

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	<p>ground-based monitoring required by Rule 1150.1, and the integrated ground-based monitoring required by Rule 1150.1, the Reaction Committee shall review and analyze the concurrently collected integrated and instantaneous data, and shall submit a report to South Coast AQMD [Baitong Chen, Air Quality Engineer, (bchen@aqmd.gov); Nathaniel Dickel, Senior Air Quality Engineer, (ndickel@aqmd.gov), and Christina Ojeda, Air Quality Inspector, (cojeda@aqmd.gov)]. This report shall compare the concurrently collected data during the study period and include the Reaction Committee's recommendation on which method (ground-based or aerial surveillance) Respondent should use moving forward to comply with the enhanced surface emissions monitoring required by Condition Nos. 9 and 10. South Coast AQMD may review and approve the Reaction Committee's recommendation on the determination of which method Respondent should use moving forward, before Respondent changes its monitoring under Condition Nos. 9 and 10.</p> <p>g. Upon approval by South Coast AQMD, Respondent may implement the Reaction Committee's recommendation. If the Reaction Committee recommends that Respondent conduct the surface emissions monitoring required by Condition Nos. 9 and/or 10 using OTM-51 and/or OTM-51 modified for integrated monitoring, then Respondent may replace the monitoring currently required by Condition Nos. 9 and/or 10 with the OTM-51 and/or modified OTM-51 monitoring. If the Reaction Committee recommends that Respondent continue conducting the instantaneous and/or integrated surface emissions monitoring required by Condition Nos. 9 and/or 10 using the instantaneous and/or integrated ground-based monitoring required by Rule 1150.1,</p>

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	<p>then Respondent may stop conducting the instantaneous and/or integrated aerial surveillance monitoring.</p> <p>h. Notwithstanding any changes to the monitoring conducted under Condition Nos. 9 and/or 10, Respondent shall continue to comply with the surface emissions monitoring requirements of Rule 1150.1.</p>