

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

In The Matter Of

SOUTH COAST AIR QUALITY
MANAGEMENT DISTRICT,

Petitioner,

vs.

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

Respondent.

Case No. 6177-4

**DECLARATION OF ROBERT DICK,
P.E., B.C.E.E.**

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

Hearing Date: October 28 and 29, 2026

Hearing Time: 9:30 A.M.

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

I, Robert Dick, declare as follows:

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

Background and Experience

2. As discussed in detail in my prior declarations in Case No. 6177-4, I serve as the Senior Vice President and Solid Waste Division Leader and Business Unit Director for SCS Engineers, Inc. (“SCS”) and have worked for SCS for approximately 36 years. I am a licensed professional engineer with over 36 years of experience on civil and environmental engineering projects related to solid waste management. My work focuses largely on municipal solid waste landfills like the Chiquita Canyon Landfill (the “Landfill”). I was retained by Chiquita Canyon, LLC (“Chiquita”) to provide expert consulting services related to managing the elevated temperature landfill (“ETLF”) conditions the Landfill is currently experiencing and any resulting impacts, including odors and liquids.

3. I serve on the Reaction Committee as the subject matter expert for chemical reaction(s) within landfills, which can result in atypical landfill conditions, such as heat accumulation, certain changes in landfill gas and leachate composition, distinct odors, accelerated settlement, formation of

significant subsurface pressures, and elevated levels of hydrogen, dimethyl sulfide, and non-methane organic compounds.

4. This declaration is made for the status and modification hearing being held on October 28 and 29, 2026 on the Stipulated Order for Abatement in Case No. 6177-4 with the South Coast Air Quality Management District (“South Coast AQMD”), most recently modified on June 3, 2026 (“Modified Stipulated Order”).

Compliance with the Modified Stipulated Order

5. The Modified Stipulated Order contains 110 conditions, many with multiple subparts, requiring Chiquita to take a wide range of actions designed to slow and stop the landfill reaction, and mitigate any impacts.

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

7. Attached hereto as **Attachment 2** is a table summarizing the main reports prepared and submitted to South Coast AQMD under the Modified Stipulated Order, their respective statuses, and the Reaction Committee member in charge of each report. Each report that has been submitted to South Coast AQMD has also been posted on Chiquita’s Odor Mitigation website (<https://chiquitacanyon.com/odor-mitigation/>).

New Reaction Mitigation Area Determinations

8. From September 2023 to May 2026, on a monthly basis, the Reaction Committee prepared and updated the boundaries of the “Reaction Area” based on specific data parameters. These determinations used a methodology which allowed the Reaction Committee experts to interpret data compiled from multiple sources over a period of time and employ their subject matter expertise and professional judgment to assess whether certain portions of the waste mass containing individual landfill gas extraction wells and/or temperature monitoring probes should be included within the “Reaction Area” or not. **Condition 9** of the Modified Stipulated Order replaced the prior “Reaction Area” determinations with new “Reaction Mitigation Area” determinations, beginning with the report that covered the data recorded during the month of May 2026. The new determinations utilize an objective evaluation methodology devoid of any interpretation or professional judgment to identify the landfill

surface grids (“grids”) within which Chiquita agrees to proactively implement additional reaction mitigation measures. The new methodology does **not** delineate the area of the Landfill within which Chiquita’s experts believe the reaction is occurring.

9. The new methodology is a prescriptive, formulaic evaluation of the same data parameters previously utilized by the Reaction Committee in the monthly “Reaction Area” determinations. But the new methodology eliminates the Reaction Committee’s interpretation, analysis, expertise, and judgment from the baseline determination and is completed on a grid-by-grid basis (as opposed to a well-by-well basis). Whether a particular grid is included within the “Reaction Mitigation Area” boundary simply depends on whether certain of those data parameters conform to prescribed criteria thresholds within each grid based on the available data from that month.

10. As required by **Condition 9** of the Modified Stipulated Order, under the new methodology, Chiquita and its consultant team review available data on a monthly basis to assess which grids meet the criteria for inclusion within the Reaction Mitigation Area. Chiquita then prepares a Reaction Mitigation Area Determination Report with the determination, supporting evidence, and relevant data exhibits. The determination now involves a cumulative evaluation of the same data parameters previously utilized by the Reaction Committee within each individual grid within the Main Canyon (i.e., excluding grids 21-29, 105-107 [Canyon B] and grids 1-20, 108-144 [Primary Canyon]). The required parameters include:

1. Vertical landfill gas (“LFG”) wellhead temperatures (greater than 160 degrees Fahrenheit),
2. Temperature probe measurements (greater than 170 degrees Fahrenheit for more than three (3)-weeks at any depth),
3. Landfill gas quality and methane to carbon dioxide (CH₄:CO₂) ratio (methane levels of less than 30 percent in conjunction with CH₄:CO₂ ratios less than 1.0),
4. Landfill gas concentration of carbon monoxide (CO) (greater than 1,500 parts per million (“ppm”)), to the extent measured,
5. Landfill gas concentration of hydrogen (H₂) (greater than two (2) percent by volume), to the extent measured,

6. Landfill settlement (eighteen (18) inches or greater within a 60-day period), and

7. Pressurized leachate releases (“PLR”).

11. Chiquita may also consider leachate seeps, odor characteristics, wellheads experiencing conditions which would be expected to result in a PLR (e.g., elevated pressure, elevated temperature, liquid flow through a wellhead), and waste cuttings according to borehole drilling logs.

12. For each individual grid that is contiguous to the prior month’s Reaction Mitigation Area, where any three (3) or more of the parameters listed above are present at the time of evaluation, including any combination of wells, temperature probes, or areas within the grid, that grid must be included in the Reaction Mitigation Area.

13. For each individual grid that is non-contiguous with the prior month’s Reaction Mitigation Area, if the three (3) parameters present include a temperature parameter (parameters 1 and 2 above), the grid must be included in the Reaction Mitigation Area.

14. If a non-contiguous grid has three (3) parameters present but none include a temperature parameter, then Chiquita conducts confirmatory sampling of landfill gas wellheads to determine whether the grid should be included in the Reaction Mitigation Area. Chiquita first conducts confirmatory field testing for CO using colorimetric tubes with a lower limit of 100 ppm and for H2 using field instrumentation with a lower limit of two (2) percent by volume. If the field testing confirms the presence of either CO or H2 above the lower limits of the instrumentation, Chiquita obtains a landfill gas sample from each wellhead within the grid for lab analytical testing using Method ALT-144 for CO and Method 1946 for H2. If the lab testing confirms that either constituent is above the concentrations listed in parameters 4 and 5 above, Chiquita includes that non-contiguous grid within the Reaction Mitigation Area.

15. True and correct copies of the final Reaction Mitigation Area Determination Reports since the Modified Stipulated Order went into effect are attached hereto as **Exhibits A through E.**

Reaction Status

16. While the Reaction Mitigation Area boundary determinations no longer evaluate the boundaries of the reaction area, Chiquita and I continue to evaluate the key reaction indicator data to assess whether the mitigation measures currently in place at the Landfill are having their intended

effects. I believe the mitigation measures involving heat removal through extraction of landfill gas and leachate are being successfully implemented as evidenced by the dramatic increase in gas recovery and leachate collection quantities as compared to the conditions prior to the initiation of these mitigation measures. These efforts are depressurizing the waste mass and diminishing the symptoms and impacts associated with the reaction, such as pressurized leachate releases and fugitive emissions. Furthermore, these mitigation measures have contained and managed the ETLF characteristics affiliated with the reaction. The region with elevated temperatures is stable and present in generally the same area of the waste mass that was observed when the reaction was initially assessed and delineated.

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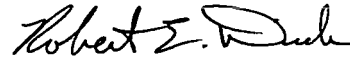
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1 I declare under penalty of perjury under the laws of the State of California that the foregoing is true and
2 correct to my personal knowledge.

3 Executed on October 21, 2026, in Bedford, Virginia.

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6 _____
7 Robert Dick
8 Senior Vice President
9 SCS Engineers
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**BEFORE THE HEARING BOARD OF THE
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**ATTACHMENT 1 TO DECLARATION
OF ROBERT DICK, P.E., B.C.E.E.**

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

Hearing Date: October 28 and 29, 2026

Hearing Time: 9:30 A.M.

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

STIPULATED ORDER CONDITIONS CHART

Condition No.	Summary of Requirement(s)	Status
9(a), 9(b)	Chiquita must review applicable data, make a determination about whether to revise the Reaction Mitigation Area map, and submit the determination, supporting evidence, revised Reaction Mitigation Area map (if applicable), isothermal gradient range map consisting of wellhead temperature measurements, wellhead carbon monoxide range map, wellhead hydrogen range map, wellhead CH ₄ :CO ₂ ratio range map, monthly landfill settlement isopach maps and 60-day isopach map, wellhead and temperature probe map with grids displayed, and vertical temperature profiles for temperature probes at least once per month.	Compliance ongoing; most recently submitted on June 10 (revised July 7), July 10 (revised July 15), August 10, September 10, and October 9, 2026. True and correct copies of these final determinations are attached hereto as Exhibits A through E and are posted on Chiquita's Odor Mitigation website (https://chiquitacanyon.com/odor-mitigation/).
12	Complete the formation of the Reaction Committee and provide the names and credentials of all persons included in the Reaction Committee.	Completed; submitted on October 5, 2023; updated on April 5, 2024.

Condition No.	Summary of Requirement(s)	Status
12(f)	Beginning in March 2024 and concluding May 2026, host a monthly virtual meeting with all members of the Reaction Committee and South Coast AQMD technical staff.	Completed.
12(f)(i)	Provide proposed agendas 10 calendar days prior to the meeting.	Completed.
12(f)(i)	Provide any tables, graphs, or documents 2 calendar days prior to the meeting.	Completed.
12(f)(iv)	Post on Chiquita's Odor Mitigation website a summary of each meeting 20 days after the meeting.	Completed; most recently posted on June 5, 2026. A true and correct copy of this summary is attached hereto as Exhibit F and is posted on Chiquita's Odor Mitigation website.
12(g)(ii)	Submit a report on the cause of the alleged chemical reaction(s) resulting in the elevated well temperatures, elevated levels of dimethyl sulfide ("DMS") formation in the landfill gas, and formation of elevated levels of non-methane organic compounds in the landfill gas, in addition to solutions to slow and stop the reaction(s) in the landfill.	Completed; submitted on December 8, 2023; see Chiquita's Odor Mitigation website.
12(h)	Post on Chiquita's Odor Mitigation website all expert reports submitted pursuant to Condition 12.	Compliance ongoing; see Chiquita's Odor Mitigation website.
39	Maintain and regularly update Chiquita's Odor Mitigation webpage.	Compliance ongoing; see Chiquita's Odor Mitigation website.
40	Host a public one-hour community meeting to provide updates with regard to implementation of the Stipulated Order and post materials to the website each calendar month following a month in which Chiquita receives three or more Rule 402 notices of violation from South Coast AQMD.	Compliance ongoing; most recently held on June 18, July 16, August 20, and September 17, 2026. Meeting information is posted on Chiquita's Odor Mitigation website.
50	Follow the direction of the Environmental Protection Agency ("EPA") to implement the Master Work Plan submitted to EPA under the Unilateral Administrative Order ("UAO").	Not yet in effect; upon EPA's approval of the Master Work Plan.

Condition No.	Summary of Requirement(s)	Status
	Submit any monthly progress reports submitted to EPA in accordance with the UAO to South Coast AQMD.	
66	Install and operate a remote monitoring system (“RMS”) in 20 wellheads, measuring the gas temperatures at each of the wells. Increase the monitoring frequency for temperature and pressure at landfill gas collection wells within the Reaction Area to twice monthly.	Completed; notification submitted on December 24, 2024.
66(a)(i), 66(a)(ii)	Submit finalized contracts to install and operate the remote wellhead temperature monitoring system and relevant known information of the RMS.	Completed; submitted on September 17, 2024 and posted on Chiquita’s Odor Mitigation website.
66(a)(iii)	Contact at least three reputable vendors for each RMS device and components that have identified issues/concerns and obtain proposed solutions and recommendations for each such concern; submit the documented correspondence of the results of the communication.	Completed; submitted on October 11, 2024 and posted on Chiquita’s Odor Mitigation website.
66(a)(iv)	Submit findings and solutions to issues documented in Condition 66(a)(ii) and (iii), including any inventory of vertical wells and temperature monitoring probe network infrastructure.	Completed; submitted on October 30, 2024 and posted on Chiquita’s Odor Mitigation website.
66(a)(v)	Reaction Committee to submit its determination of the location for installation of the RMS equipment.	Completed; submitted on October 15, 2024 and posted on Chiquita’s Odor Mitigation website.
66(a)(v)	Notify South Coast AQMD that the RMS for temperature in at least 20 wellheads was installed and operational in the initial Reaction Area as defined by Condition 9(a).	Completed; submitted on December 24, 2024 and posted on Chiquita’s Odor Mitigation website.
66(a)(vi)	Reaction Committee to submit a proposal to assess the viability and functionality of an RMS which measures temperature and pressure within a well with a pump located in the Reaction Area.	Completed; submitted on January 31, 2025 and posted on Chiquita’s Odor Mitigation website.
66(a)(vii)	Continue operating an RMS which measures temperature in at least 20 wellheads operating in the Initial Reaction Mitigation Area.	Compliance ongoing.
66(a)(vii)	Notify South Coast AQMD of any failure of the RMS system due to the	Compliance ongoing.

Condition No.	Summary of Requirement(s)	Status
	Reaction Mitigation Area conditions at the Landfill within 14 days of failure.	
66(a)(vii)	If the failure was suspected to be due to Reaction Mitigation Area conditions, provide a subsequent notification within 60 days of the failure, including evidence detailing how and why the failure occurred due to ETLF conditions.	Compliance ongoing.
67	Designate an Inspection Liaison responsible for coordinating an exchange of information between Chiquita and South Coast AQMD.	Completed; most recently revised on January 26, 2026.
75, 75(a)-(e)	Continue operating remote monitoring units on 21 wellheads and 5 landfill gas headers. All units must monitor for temperature, pressure, and vacuum. Units installed on wells without pumps must also monitor liquid levels.	Compliance ongoing.
75(f)	Submit a proposal to assess the viability and functionality of adding gas flow rate and composition as monitoring parameters to at least five wellhead units.	Completed; submitted on August 29, 2025; revised on September 19, 2025 and posted on Chiquita's Odor Mitigation website.
75(f)	Conduct assessment and submit final report 210 days from submittal of proposal with 3 months of data collection.	Completed; submitted on April 8, 2026 and posted on Chiquita's Odor Mitigation website.
75(g)	Record and upload data collected by the monitoring units for review in the vendor/distributor's provided graphical user interface. Grant South Coast AQMD read and download access to the interface.	Compliance ongoing; granted read and download access on November 3, 2025.
75(h)-(j)	Maintain records of actions performed to resolve issues with monitoring units, inspection and maintenance activities performed on the monitoring units, and any periods of Condition 75 RMS equipment downtime; provide upon request.	Compliance ongoing.
92	Submit any file(s) with a cumulative size larger than 35 MB via a shared link by email.	Compliance ongoing.

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**ATTACHMENT 2 TO DECLARATION
OF ROBERT DICK, P.E., B.C.E.E.**

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

Hearing Date: October 28 and 29, 2026

Hearing Time: 9:30 A.M.

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

CHART OF KEY REPORTS, INVESTIGATIONS, AND STUDIES

Condition No.	Title	Status	Reaction Committee Member
3(b)	A report on the potential cause(s) of the recent fires within the carbon media vessels.	Initial report submitted on July 17, 2026; supplemental report in progress.	Srividhya Viswanathan
3(c)	A report on the potential solutions to address the potential cause(s) of the recent carbon media vessel fires.	Initial report submitted on August 28, 2026; supplemental report in progress.	Srividhya Viswanathan
3(d)	A report on the known and possible post-combustion sulfur oxides (SOx) control systems, viability of such system(s), and feasibility of operation of such system(s) at the landfill.	Completed; submitted on August 28, 2026.	Patrick Sullivan
12(g)(i)	A report on known and possible methods for effective treatment of DMS and preventative mechanisms for DMS formation in landfill gas.	Completed; submitted on April 30, 2024.	Patrick Sullivan
12(g)(ii)	A report on the cause of the alleged chemical reaction(s) resulting in the elevated well temperatures, elevated levels of DMS formation in the landfill	Completed; submitted on December 8, 2023.	Robert Dick

Condition No.	Title	Status	Reaction Committee Member
	gas, and formation of elevated levels of non-methane organic compounds in the landfill gas, in addition to solutions to slow and stop the reaction(s) in the landfill.		
12(g)(iii)	A report on the feasibility and availability of a continuous community emission monitoring system to conduct continuous monitoring and provide estimates of DMS concentrations at the facility fence line and within the affected community.	Completed; submitted on December 1, 2023.	Patrick Sullivan
12(g)(iii)	A workplan for the installation and operation of the continuous community emission monitoring system for DMS concentrations if monitoring is feasible.	The DMS Committee (now the Reaction Committee) determined that continuous monitoring is not feasible. Notified South Coast AQMD on December 31, 2023.	Patrick Sullivan
12(g)(iv)	A report on landfill best management practices and alternative methods to minimize the release of fugitive surface gas and minimize odors from fugitive surface gas, including cover practices at the Reaction Area and working face, and how best to address related odorous emissions.	Completed; submitted on November 6, 2023.	Neal Bolton
12(g)(v)	A report on the known health risks from acute and long-term exposure to DMS, including any action levels from other public health or government entities, and including a summary of recommended actions for persons exposed to DMS for acute and long-term durations.	Completed; submitted on January 15, 2024.	Dr. Pablo Sanchez-Soria
12(g)(vi)	A report on the health impacts from ongoing and long-term exposure to hydrogen sulfide, or other speciated sulfur compounds, and any other hazardous air pollutants.	Completed; submitted on August 1, 2024.	Dr. Pablo Sanchez-Soria & Dr. Richard Pleus
12(g)(vii)	A report on the development of a model to estimate the rate of liquid generation and the total quantity of liquid existing	Completed; submitted on June 25, 2024.	Neal Bolton

Condition No.	Title	Status	Reaction Committee Member
	within the landfill waste mass at any given time.		
12(g)(vii)(1)	Update the model and submit reports summarizing the updated model and results of modeling on a semi-annual basis.	Compliance ongoing; most recently submitted on July 21, 2026.	Neal Bolton
12(g)(viii)	An investigation into the existing landfill gas collection and conveyance piping materials, alternative landfill gas collection and conveyance piping materials, and current landfill conditions to determine appropriate piping for the current and expected future temperature conditions.	Completed; submitted on June 21, 2024.	Srividhya Viswanathan
12(i)	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.	Completed; submitted on October 31, 2023.	Patrick Sullivan
12(i)	A second flux chamber study to document results of the site-wide emission rates for compounds tested in Chiquita's flux chamber study events.	Completed; submitted on June 3, 2024.	Patrick Sullivan
12(i)	Prepare a proposed protocol(s) for the flux chamber studies or use a previous flux study protocol, reviewed and approved by South Coast AQMD, if the proposed testing will follow all aspects of the prior approved protocol, with the exception of the testing/sampling locations onsite.	Compliance ongoing; most recently submitted on May 11, 2026.	Patrick Sullivan
12(i)	Conduct landfill gas flux studies for, at a minimum, methane, non-methane organic compounds ("NMOC"), speciated hydrocarbons (C2-C12), toxic air contaminants ("TAC") analyzed by EPA Method TO-15 (including acrolein and additionally at least the ten highest concentration tentatively identified compounds), total reduced sulfur ("TRS"), and speciated sulfur compounds to determine the surface flux throughout the landfill starting with Quarter Four 2024 and once every four months thereafter. Submit reports	Compliance ongoing; most recently submitted on May 15, 2026.	Patrick Sullivan

Condition No.	Title	Status	Reaction Committee Member
	detailing the operational conditions, methodology, quantity of tests and locations, sampling location determination, sampling results, data analysis, emission results, discussion of the results, and comparison of previous flux chamber test results to the current results.		
26	A report on the feasibility of temporary containment measures for the purposes of controlling leachate and possible discharges of pressurized leachate when drilling additional holes for wells, liquid pumps, temperature devices, or other purposes.	Completed; submitted on March 12, 2024.	Neal Bolton
32, 32(a)	An air modeling report on odor and emission transport of odors from the landfill, including the identification of effective techniques to remedy potential odor impacts on the nearby community, an evaluation of the efficacy of odor control measures, and a recommendation on whether additional modeling is recommended to fully address the current odor circumstances at the landfill and potential odor impacts on the nearby community.	Completed; submitted on December 1, 2023.	Neal Bolton
32(b)	A proposal for an additional air modeling study.	Completed; submitted on January 15, 2024.	Neal Bolton
32(b)(ii), 32(c)	A revised air modeling study proposal according to comments received from South Coast AQMD.	Completed; submitted on May 8, 2024, with a further revision submitted on May 16, 2024.	Neal Bolton
32(c)	A final written report on the additional air modeling.	Completed; submitted on September 2, 2024.	Neal Bolton
56	A report detailing the parameters with respect to the sampling and analysis of vapors in the headspace of leachate tanks located in the Top Deck Tank Farm and complete laboratory analysis results.	Completed; submitted on April 18, 2024; revised on April 24, 2024.	Patrick Sullivan
70	A report on the landfill's current landfill gas generation and projected landfill gas	Completed; submitted on June 28, 2024;	Patrick Sullivan

Condition No.	Title	Status	Reaction Committee Member
	generation for the next five calendar years.	updated on July 10, 2026.	
72(b)	A source test report detailing final results within 30 days of analyzing samples of vapor flow in the piping used to vent the leachate storage tanks and landfill gas condensate tanks and route the vapors to the landfill gas control system.	Completed; most recently submitted on June 30, 2026 (revised on July 30, 2026).	Patrick Sullivan
72(c)	A recommendation from the Reaction Committee on additional vapor flow testing within 30 days of submission of the Condition 72(b) report. The Reaction Committee may submit further recommendations within 30 days of additional source testing under Condition 72.	Completed; most recently submitted on May 16, 2025.	Patrick Sullivan
75(f)	Conduct an assessment of the viability and functionality of adding gas flow rate and composition as monitoring parameters to at least five wellhead units and submit a final report 210 days from the submittal of a proposal with 3 months of data collection.	Completed; submitted on April 8, 2026.	Robert Dick
83	Conduct a study and analysis and submit a report of specific landfill operational events from June 1, 2024 through December 31, 2024 and their potential emission impacts to the surrounding community, as determined from an analysis of the air quality data recorded at monitoring stations MS-01 through MS-12. The report must also include a proposed scope for a continuation of the study for up to an additional 6 months, subject to review and approval by South Coast AQMD. The continuation of the study must proceed upon written approval by the South Coast AQMD.	Completed; submitted on March 31, 2025.	Patrick Sullivan
83(a)	Conduct a continued study of specific landfill operational events and their potential emission impacts; prepare and submit a report detailing the landfill	Completed; submitted on January 30, 2026.	Patrick Sullivan

Condition No.	Title	Status	Reaction Committee Member
	operational events, data, and study findings.		
84	Evaluate the installation of windbreaks and/or wind flow disrupters along the western and northern borders of the facility, and/or ridgeline, such that there are not any distinguishable gaps in the border and/or ridgeline which may result in an odor channeling affect into the Val Verde community, to enhance the dispersion of odors from the facility and submit a report detailing the findings of the evaluation.	Completed; submitted by November 15, 2024.	Neal Bolton
96	An updated report on the landfill's current and projected landfill gas generation originally prepared pursuant to Condition 70.	Completed; submitted on April 30, 2025.	Patrick Sullivan
100	A feasibility assessment proposal to assess the viability and functionality of a leachate vapor recovery and control system to recover leachate vapors during loading of liquid/leachate into the leachate tanker trucks and control the recovered vapors either in Chiquita's existing landfill gas control system or in a new or modified system.	Completed; submitted on January 16, 2026; revisions submitted on September 4, 2026.	Srividhya Viswanathan