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Attorneys for Petitioner
USA Waste of California, Inc. dba El Sobrante Landfill

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

USA Waste of California, Inc. dba El
Sobrante Landfill
[Facility ID No. 113674],

Petitioner,

v.

South Coast Air Quality Management
District,

Respondent.

Case No.: 5139-3

**SUPPLEMENTAL DECLARATION
OF CHRISTIAN COLLINE RE
MODIFICATION OF AN EXISTING
VARIANCE; FILED IN SUPPORT OF
A CONSENT CALENDAR REQUEST**

Date: July 16, 2025
Time: 9:30 a.m.
Place: South Coast Air Quality
Management District
21865 Copley Drive
Diamond Bar, CA 91765

I, Christian Colline, declare:

1. I am the Director of Air Programs (West) for WM, the parent company of
Petitioner USA Waste of California, Inc. dba El Sobrante Landfill (“Petitioner” or
“USA Waste”), which operates the El Sobrante Landfill (the “Facility”). I make this

1 declaration based upon personal knowledge of the facts set forth herein and, if called
2 as a witness in this matter, I could and would competently testify to such facts.

3 2. This declaration supplements my previous declaration submitted in
4 support of the Parties' Stipulation (the "Consent Calendar Stipulation") to place the
5 Petition For Modification Of An Existing Variance in Case No. 5139-3 (filed on June
6 12, 2025) (the "Modification Petition") on the Hearing Board's Consent Calendar.

7 3. In that previous submittal, I declared that Petitioner's operation under the
8 [Proposed] Order submitted in support of the Consent Calendar Stipulation is not
9 expected to result in a violation of Health and Safety Code Section 41700 nor South
10 Coast Air Quality Management District ("SCAQMD" or the "District") Rule 402. *See*
11 Consent Calendar Stipulation, Ex. 1 at ¶ 20.

12 4. This supplemental declaration details additional facts in support of this
13 statement.

14 5. Petitioner has not received any Notice of Violation ("NOV") from
15 SCAQMD alleging nuisance or violations of District Rule 402 at the Facility during
16 the variance period.

17 6. As reflected in the Modification Petition, nine (9) total complaints were
18 submitted to Petitioner alleging the detection of odors from the Facility in nearby
19 residential neighbors during the six (6) month period that preceded the filing of the
20 Modification Petition from December 10, 2024 to June 10, 2025. *See* Modification
21 Petition at p. 8 (Question # 16).

22 7. Since June 11, 2025, two (2) complaints from one person have been
23 received by Petitioner alleging the detection of odors from the Facility. These
24 complaints were not verified by SCAQMD.

25 8. SCAQMD has not informed Petitioner that it has received any additional
26 odor complaints related to the Facility during the Regular Variance period.
27
28

1 9. Petitioner is not aware of circumstances to suggest that continued
2 operation of the Facility during the modified variance period would be expected to
3 cause a violation of Health and Safety Code Section 41700 or SCAQMD Rule 402.
4

5 I declare under penalty of perjury under the laws of the State of California that
6 the foregoing is true and correct. Executed this 15th day of July 2025 at Concord,
7 California.

8 By: 

9 Christian Colline
10 WM, Director of Air Programs (West)