

**Stipulated Proposed Modifications to Stipulated Order for Abatement (6177-4)
April 19, 2024**

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| 1(f) | <p>If Respondent, or Respondent’s contractor, as applicable, conducting the odor surveillance detects odors at three or more stops that are determined to be of a strength of 3 or higher on the scale above during any surveillance occurring during Respondent’s operating hours (between the hours of 4:00am and 5:00pm), <u>that are described as chemical, leachate, landfill gas, or similar non-trash landfill odors</u>. Respondent, or Respondent’s contractor, as applicable, shall immediately notify landfill operating staff <u>responsible for the Reaction Area</u>. <u>If such odors are described as trash, Respondent, or Respondent’s contractor, shall immediately notify landfill operating staff responsible for the Working Face Area</u>. Respondent shall designate an employee <u>in each of the Reaction Area and the Working Face Area</u> able to receive and direct action related to such notifications promptly. Upon receiving such notification <u>for the Reaction Area</u>, Respondent shall, within 30 minutes of receipt, review and initiate modifications, as appropriate, to fan placement, and conduct a visual inspection of the Reaction Area (as defined in Condition 9(a)) to assess, and address as needed, any cracks in the surface of the area. <u>Upon receiving such notification for the Working Face Area, Respondent shall employ all appropriate trash odor mitigation strategies, including taking action pursuant to Condition No. 43. Respondent shall have trained employee(s) or trained contractor(s) re-perform odor surveillance following deployment of additional mitigation to assess if trash odors have dissipated, and, as applicable, take additional remedial steps pursuant to Condition No. 43(f).</u></p> |
| 8(k) | <p>A summary report on <u>SCS’s Respondent’s</u> implemented improvements to the landfill gas collection system <u>beyond the additions to the landfill gas collection system required pursuant to Condition No. 15 and 8(m)</u>.</p> |
| 8(l) | <p>An inspection log for landfill cover <u>and geosynthetic cover</u> inspections, pursuant to Condition No. 30.</p> |
| 8(m) | <p>Any subsequent additions to the landfill gas collection system, pursuant to Condition No. 15; an updated vertical extraction well map detailing all existing fully functional working vertical extraction wells and the vertical extraction well additions completed within the month; a map showing an overlay of fully operational working wells, landfill surface monitoring grids, and outlines of the two defined areas pursuant to Condition 15(b); <u>and copies of as-built well logs (regarding well depth installations and updates) for vertical extraction wells completed within the month</u>.</p> |
| 8(o) | <p>Updates on the procurement and installation of the geosynthetic cover(s), pursuant to Condition No. 31, <u>and including changes required or approved by the Local Enforcement Agency</u>.</p> |
| 12(g)(vii) | <p>The development of a model to estimate the <u>rate of liquid generation quantity of liquid left</u> in the landfill, <u>and total quantity of liquid existing within the landfill waste mass at any given time</u> (including supporting assumptions, references, and calculations). By no later than <u>May 21 June 25</u>, 2024, Respondent shall submit to South Coast AQMD a report summarizing the model <u>and results of modeling</u>.</p> |
| 12(i) | <p>Respondent has conducted an initial flux chamber study pursuant to the direction of the Los Angeles County Department of Public Health. Respondent shall submit a report documenting the findings of the initial study no later than October</p> |

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| | <p>31, 2023 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)]. Respondent shall conduct an additional landfill gas flux study for methane, non-methane organic compounds (“NMOC”), toxic air contaminants (TAC), total reduced sulfur (“TRS”), and speciated sulfur compounds to determine the surface flux throughout the landfill. The study shall be conducted through the use of dynamic flux chambers oriented at various locations throughout the landfill site. Respondent shall prepare a proposed protocol for the study based on the results of the initial study and shall submit the protocol 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)] for review and approval by December 31, 2023. A report documenting the differences in the findings between the initial study and the additional study shall be submitted by <u>June 3, 2024</u>no later than 90 days after South Coast AQMD approves the protocol 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)].</p> |
| 15(g) | <p>Each horizontal gas collection well shall be connected to an operating landfill gas header or the ends of the well shall be sealed with blind flanges, glued or fused caps, or other types of seals approved by the South Coast AQMD as soon as the well is installed;</p> |
| 18 | <p>...Respondent shall, within 14 calendar days of approval of this Order, revise the dewatering guidelines according to the comments received by email on March 13, 2024, and re-submit the revised dewatering guidelines to South Coast AQMD for final <u>written</u> approval. The proposed Reaction Area dewatering guidelines and implementation procedures shall be implemented within seven (7) days of South Coast AQMD approval, and shall be implemented to the maximum extent feasible if Respondent’s facility is encountering leachate tank capacity shortages. <u>If any conflict exists between any condition or requirement of this Order and any part of the South Coast AQMD approved Dewatering Guidelines, this Order shall take precedence over the approved Dewatering Guidelines and Respondent shall submit revised Dewatering Guidelines that resolve such a conflict to South Coast AQMD for final written approval.</u></p> |
| 27(a) | <p>Measure and record the leachate temperature within <u>all</u> the four (4) 6-inch inch leachate pipes feeding into the onsite frac tanks, and at the piping leading into the tanks at <u>all tank farms</u>the bottom of the hill. <u>The temperature measurements reported shall include a map clearly indicating temperature monitoring location(s), and the reported results shall clearly state which tank(s) or tank farm(s) are downstream of the monitoring location, receiving the measured leachate;</u></p> |
| 32(c) | <p><u>Since the Reaction Committee recommended additional modeling, Respondent shall, within 14 calendar days of approval of this Order, revise the air modeling</u></p> |

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| | <p><u>study proposal according to the comments received by email on March 28, 2024, and re-submit the revised proposal to South Coast AQMD for approval. Respondent shall submit a final written report on the additional modeling to South Coast AQMD by September 2, 2024 or 90 days following approval of the air modeling study proposal by South Coast AQMD, whichever is later.</u></p> |
| 34(c) | <p><u>Respondent shall, by April 30, 2024, retain a third party to develop and install a system that provides automatic electronic notification via email for any exceedance of the applicable 1-hour NAAQS, CAAQS, or acute 1-hour OEHHA REL, whichever is lower (both in time and concentration) based on a time weighted average for benzene and H2S monitored in real-time by Respondent’s monitoring network within the surrounding community (MS-06 through MS-12) by May 30, 2024. Respondent shall be responsible for the third party including in such system a method for members of the public to sign up to receive such notifications without any personally identifying information (including email address) being disclosed to Respondent. Respondent shall be responsible for the third party putting into effect the notification system within three business days of direction from South Coast AQMD.</u></p> |
| 35(b) | <p><u>Respondent shall implement quality control measures (such as span and blank checks, calibration, etc.) as specified by South Coast AQMD to ensure the accuracy of their monitoring network within 30 days of notification.</u></p> <p><u>(i) If, following receipt of notification from South Coast AQMD, Respondent disputes the need to take one or more specified quality control measures, Respondent shall submit a response letter to the South Coast AQMD (attn: Stephen Dutz, sdutz@aqmd.gov) not later than 20 days prior to the time for implementation which details the dispute or objection, including provision of supporting evidence as applicable. Respondent shall further propose not less than 3 potential time slots for a virtual meeting during South Coast AQMD business hours where appropriate staff or consultants from Respondent are able to discuss the matter with South Coast AQMD.</u></p> <p><u>(ii) If Respondent follows the procedures outlined in Condition No 35(b)(i) above, the deadline for implementing the disputed quality control measures shall be delayed until a further deadline is set by South Coast AQMD in a response determination.</u></p> <p><u>(i)(iii) If EPA requires Respondent to take any action that is inconsistent with quality control measures specified by South Coast AQMD under this Condition 35(b) with respect to the MicroGCs, Respondent shall immediately contact the South Coast AQMD [NAMES] and describe the inconsistency. Respondent shall endeavor to resolve the inconsistency with the Executive Officer, while adhering to the measures specified by EPA.</u></p> |
| 36 | <p>Respondent shall, within 75 days of the issuance of this Order <u>by May 1, 2024</u>, install and maintain instrumentation within the nearby residential community, at sites MS-10 and MS-12, as defined in Respondent’s existing Community Air Monitoring Program. These instruments shall be capable of measuring hourly concentrations of benzene, toluene, ethylbenzene, xylenes, and other relevant</p> |

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| | <p>volatile organic compounds (VOC) with site surface emissions greater than 1 ton/year, as indicated in Table 5.5 of the Chiquita Canyon Landfill Assessment of Air Emissions from Landfill Surfaces Report dated October 2023. <u>While long-term solutions for permanent power are implemented and any necessary permits and approvals by regulatory agencies for permanent power are obtained, these instruments will be installed and put into operation using temporary power to allow for continuous measurements of all volatile organic compounds required. It is recognized that the use of temporary power may not guarantee the uninterrupted operation of these instruments.</u> Respondent shall develop a monitoring plan that utilizes reliable and field-proven instrumentation, such as a micro gas chromatograph (MicroGC) with pre-concentration, and seek approval from South Coast AQMD. If measurement of any target compounds is not able to be practically achieved, Respondent shall inform and seek approval from South Coast AQMD. Respondent shall request and pay for expedited processing of all permits and procurement of the instruments, if available. To ensure Respondent is on schedule to complete installation within the 75 days, Respondent shall provide the South Coast AQMD (attn: Kathryn Roberts, kroberts@aqmd.gov; Mary Reichert, mreichert@aqmd.gov) an update at intervals of 30 days and 60 days from the issuance of the Order. Respondent shall specifically address whether it believes an extension is necessary and provide supporting documentation if it is seeking such extension. The AQMD may grant an extension of up to 60 days as appropriate based on the evidence submitted.</p> |
| 39 | <p>Respondent shall continue to maintain and update regularly (on a weekly basis) a dedicated page of its website with a highly visible link on its homepage (the “odor mitigation section”) for presenting information discussing odor mitigation at CCL. Such webpage shall include all information in English and Spanish within 30 days of the issuance of the Initial Order. <u>Subsequent reports posted on the webpage shall be sent to a translation service within 2 business days of posting on the webpage, and shall be translated and uploaded to the webpage within 2 business days of receipt from translation service.</u> and Such webpage <u>shall also</u> meet the following requirements:</p> |
| 39(h) | <p>The odor mitigation webpage shall include an “Air <u>Quality</u>” Monitoring and Health Impacts Section” which shall include a brief narrative describing the current status of air quality monitoring required under Condition 68 of Respondent’s Conditional Use Permit (No. 2004-00052-(5)). The “Air <u>Monitoring-Quality</u>” and Health Impacts Section” shall also include, via hyperlink, preceded by a brief narrative description:</p> |
| 42(k) | <p>Excavated landfill material and refuse shall be immediately, <u>not to exceed 2 hours</u>, relocated for burial onsite, immediately deposited into trucks/trailers for off-site transport and completely covered with automated vinyl tarps, with such covers tied down, except for during active loading/unloading of refuse.</p> |
| 42(n) | <p>Landfill materials and refuse which have been exposed to the atmosphere as a result of the excavation, which have not been excavated and relocated for burial or transported off site, shall be immediately, <u>not to exceed 2 hours</u>, covered (with a minimum of 6 inches of clean soil, secured plastic sheeting that is at least 10</p> |

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| | mil, or other South Coast AQMD approved cover) whenever excavation is not actively in progress, and at the end of each working day so that no portion of landfill material and refuse is exposed to the atmosphere. Foam by itself shall not be used as a night cover if it is raining or rain is predicted by the National Weather Service prior to the next scheduled day of excavation. |
| 43 | To ensure that fresh trash odors remain controlled, Respondent shall maintain the following fresh trash-related odor mitigation measures recommended by its landfill operations expert from the Stipulated Order for Abatement in Case No. 6177-1 during Unfavorable Wind Conditions, as defined in the Stipulated Order for Abatement in Case No. 6177-1. Respondent shall <u>not expose more of the working face than is operationally necessary on any working day and shall additionally</u> maintain the following odor mitigation measures: |
| 43(f) | <u>If Respondent detects trash-based odors at any stops during any odor surveillance conducted pursuant to Condition No. 1(f) during Respondent’s operating hours, Respondent shall deploy additional permitted orchard-style fans to the working face and surrounding area. If Respondent is not able to confirm the reduction of trash based odors within 1 hour of deployment of additional fans, Respondent shall reduce its working face by 25% of that day’s total size for the remainder of the operating day.</u> |
| 50 | <p>Respondent shall provide a workplan which lists the actions that Respondent plans to take in order to address the subsurface reaction and return all aspects of the CCL to good and compliant working order, including liquid/leachate seepage and discharges of pressurized leachate, methane surface exceedances, fugitive emissions of landfill gas, well temperature exceedances, and non-compliant composition of landfill gas. This workplan shall include a timeline of the proposed work, and shall include both short term and long term solutions planned to mitigate impacts to the surrounding communities and return the facility into compliance. Respondent shall submit the complete workplan to South Coast AQMD by March 13, 2024 (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). Respondent shall provide quarterly updates on the workplan, by the 13th day of every third month, starting June 13, 2024, specifying any updates to the plan or associated work timelines.</p> <p><u>Respondent shall follow the direction of EPA to implement the Master Work Plan submitted to EPA under the Unilateral Administrative Order (UAO). Any monthly progress reports submitted to EPA in accordance with the UAO shall also be submitted to the 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)).</u></p> |
| 51 | Respondent shall permit South Coast AQMD personnel to conduct all inspections deemed necessary by South Coast AQMD Compliance staff, including, but not limited to, collection of samples. If during any inspection, South Coast AQMD |

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| | <p>observes uncontrolled liquid which has at least one characteristic (including odor, appearance, etc.) that suggests the liquid may be leachate, South Coast AQMD may require Respondent to collect a sample of the liquid within 24 hours, submit the sample for expedited testing for VOCs, and submit test results to the South Coast AQMD Compliance Inspector within 24 hours of receipt of results, but no later than 96 hours after collection. Notwithstanding the preceding, Respondent may require all visitors, including South Coast AQMD staff, to <u>comply with the site's Health and Safety Plan</u> on appropriate personal protective equipment prior to visiting the Reaction Area. Upon request by South Coast AQMD, Respondent shall, within 24 hours, provide a list of all personal protective equipment that Respondent deems appropriate for visiting the Reaction Area. Respondent shall not prohibit South Coast AQMD staff from access to Respondent's facility, including the Reaction Area, if South Coast AQMD staff <u>comply with the Health and Safety Plan</u> on all personal protective equipment included on a list issued by Respondent pursuant to this condition. <u>Respondent shall provide South Coast AQMD with any updates to the Health and Safety Plan within 1 business day of going into effect.</u></p> |
| 51(a) | <p>To the extent Respondent's Health and Safety Plan requires 5-gas monitors for regulatory staff to conduct an on-site inspection, Respondent shall maintain onsite at least two 5-gas monitors (calibrated, sufficient battery, and ready for use) for regulatory personnel to use. Respondent may require any individual utilizing its 5-gas monitors to sign a waiver or release of liability in the form <u>provided by Respondent agreed upon by the parties on April 19, 2024.</u></p> |
| 55(e) | <p>South Coast AQMD grants written approval to conduct condensate injection <u>and has not withdrawn the approval based on follow-up source test evaluation(s);</u></p> |
| 55(f) | <p>Respondent conducts follow-up flare source testing, at a minimum of every 6 <u>calendar</u> months, which includes non-hazardous condensate injection, and following the requirements of sub-item (d) above; and . . .</p> |
| 65 | <p>Respondent shall provide notice 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) by Friday of each week a summary of leachate dewatering pumps that have been installed and resumed operation the prior week, the number and location of dewatering pumps anticipated to be installed and placed into operation in the following week, <u>and the location of all dewatering pumps installed and / or in operation.</u></p> |
| 68 | <p>Respondent shall by May 31 <u>June 15</u>, 2024, install appropriately ranged differential pressure gauges, with at least 0.01 inches water column resolution, or pressure gauge otherwise approved in writing by South Coast AQMD, on each leachate storage tank. Respondent shall monitor and record daily the differential pressure of each leachate tank, tank identification number, date and time of the reading, and the personnel that conducted the reading. Pressure gauges shall be calibrated according to manufacturer specifications and schedule. Respondent shall report all the recordings in the monthly report pursuant to Condition No. 8.</p> |

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| New (70) | <p><u>Respondent shall, by June 28, 2024, submit a report on the landfill’s current landfill gas generation and projected landfill gas generation for the next five calendar years, through the end of calendar year 2029. The current and projected landfill gas generation shall be estimated through use of U.S. EPA’s Landfill Gas Emissions Model (LandGEM), and the Reaction Committee’s analysis for additional landfill gas generated as a result of the ongoing reaction. The report shall include, at a minimum, the following items:</u></p> <ul style="list-style-type: none"> <u>a. LandGEM inputs, assumptions, and results;</u> <u>b. Reaction Committee analysis and associated rationale and supporting data or information;</u> <u>c. and a comparison of the estimated landfill gas generation, both current and projected, with the landfill’s flaring capacity, both current and proposed, assuming one or more flares or thermal oxidizers are offline due to maintenance, overhaul, or other unforeseen circumstances.</u> <p><u>Based on the report findings, if the landfill gas generation is expected to exceed the landfill’s flaring capacity when one or more flares or thermal oxidizers are offline, Respondent shall start the planning and procurement process for the addition of an additional flare, thermal oxidizer, or other landfill gas combustion/control equipment and ensure sufficient redundant control capacity to handle all generated landfill gas, assuming any one or more unit(s) is offline. Respondent shall submit, by January 7 2025, a complete permit application for the new construction of proposed landfill gas combustion/control equipment to ensure sufficient redundant control capacity of the landfill gas control systems. The submittal shall be accompanied with a complete Title V Revision application and shall be submitted with an expedited permit processing request and associated required fees, forms, and information.</u></p> |
| New (71) | <p><u>Respondent shall submit, by May 21, 2024, a complete permit application for the installation and operation of any aboveground surface landfill gas collection system, or underground landfill gas collection system, installed for the purpose of collecting landfill gas under the geosynthetic cover installed per Condition 31 or the cover as required by the Local Enforcement Agency. The submittal shall be accompanied with a complete Title V Revision application and shall be submitted with an expedited permit processing request and associated required fees, forms, and information.</u></p> |
| New (73) | <p><u>Respondent shall prepare an inventory of all internal combustion engine equipment rated greater than 50 HP onsite as of April 25, 2024 and shall submit this inventory to South Coast AQMD by May 21, 2024. Respondent shall submit a permit application for internal combustion engine equipment rated greater than 50 HP that is not already permitted through South Coast AQMD by June 30, 2024, accompanied with a complete Title V Revision application(s) and shall be submitted with an expedited permit processing request and associated required fees, forms, and information. Going forward, Respondent shall submit a permit application, accompanied with a complete Title V Revision application(s), for any internal combustion engines greater than 50 HP brought on site that does not already have a valid permit under Respondent’s Title V Facility Permit or that</u></p> |

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| | <u>does not already have a complete application submitted to South Coast AQMD for the engine to be included in Respondent's Title V Facility Permit.</u> |
| New (75) | The Hearing Board shall retain jurisdiction over this matter until September 6, 2024 <u>December 31, 2025</u> and at that time this Order shall no longer be of any force or effect, unless this Order is amended, modified, or dissolved before then. |