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

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

Hearing Date: March 21, 2024

Time: 9:00 am

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

I, Patrick Sullivan, declare:

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1. I present this declaration based upon personal knowledge and expertise in landfill engineering and solid waste management and am competent to testify to the facts and opinions set forth herein.

Background and Experience

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2. As discussed in more detail in my prior declarations in Case No. 6177-4, I serve as the landfill gas collection and control system expert on the Reaction Committee and am an air quality and landfill gas specialist and Senior Vice President with SCS Engineers, Inc. (“SCS”). I have 34 years of experience in the area of environmental consulting, specializing in solid waste management. My company, SCS, has been contracted by Chiquita Canyon, LLC (“Chiquita”) to operate and maintain the landfill gas collection and control system at the Chiquita Canyon Landfill (“Landfill”). I have been working on Chiquita’s landfill gas collection and control system and related compliance activities for over twenty years.

1 3. This declaration is made for the March 21, 2024 modification hearing on the Modified
2 Stipulated Order for Abatement with the South Coast AQMD issued on January 17, 2024 in Case No.
3 6177-4.

4 **Chiquita is expanding its leachate collection system to accommodate increased liquids production.**

5 4. As has been discussed in prior hearings before this Hearing Board, Chiquita is
6 experiencing an elevated temperature landfill (“ETLF”) event or chemical reaction within an inactive
7 portion of the waste mass. In response to odor issues, and pursuant to the Modified Stipulated Order,
8 Chiquita is implementing and developing mitigation measures to slow and stop the reaction and address
9 odors and impacts to the community, which include removing liquids from the landfill gas system to
10 assist in removing heat to slow and stop the reaction.

11 5. It is my understanding that the Landfill has gone from accumulating approximately
12 100,000 gallons of leachate a week to over a million gallons of leachate a week. All of this leachate
13 must be accumulated onsite and then disposed of offsite.

14 6. On February 21, 2024, Chiquita petitioned to modify the Modified Stipulated Order
15 because recent samples of Chiquita’s leachate showed levels of certain constituents above their
16 regulatory threshold, meaning that Chiquita could no longer use its regular disposal facilities to dispose
17 of this leachate without on-site pretreatment of the liquid.

18 7. The change in constituents required Chiquita to shut off some of its leachate collection
19 pumps to slow down the rate of liquids extraction and ensure adequate on-site accumulation and
20 treatment capacity.

21 8. Because of this increased need for on-site tank space, and in order to handle the increased
22 quantities of leachate being generated by the Landfill, Chiquita has greatly increased the number of
23 leachate tanks onsite. It is my understanding that as of March 14, 2024, Chiquita had 217 leachate tanks
24 onsite. It is my understanding that as of March 14, 2024, these tanks were divided into nine tank groups
25 located in the #2 East Perimeter, #4 LC Manifold, #6 North Perimeter, #7 Tank Farm (containing five
26 groups of tanks), and #9 Top Deck Tank Farm locations. A true and correct copy of a map of the tank
27 locations as of March 14, 2024 is enclosed in **Exhibit A**.

Chiquita is already working to modify its Title V permit to incorporate the recent changes to its leachate collection system.

9. Chiquita’s Title V permit, which consists of a facility description, equipment specific conditions, individual Permits to Construct/Operate and Permits to Operate, administrative conditions, facility-wide conditions, Title V administration sections, and emissions limits, includes authorization for Chiquita’s leachate collection system. As described above, Chiquita has made, and continues to make, a number of changes to this system to address the evolving situation at the Landfill.

10. Permit No. G43917, A/N 578102 sets forth requirements and conditions to operate Chiquita’s Landfill Gas Collection System, which consists of vertical gas collection wells, a header connecting to the flare station, horizontal gas collection trenches, and soil vapor extraction wells.

11. Permit No. G66132, A/N 613131 sets forth requirements and conditions to modify, construct, and operate Chiquita’s Landfill Gas Condensate and Leachate Collection/Storage System. The permit includes authorization for five condensate tanks and four leachate tanks varying in capacity.

12. On October 4, 2023, Chiquita applied to South Coast AQMD for an Alteration/Modification to the Landfill Gas Collection System (Permit No. G43917, A/N 578102) and the Landfill Gas Condensate and Leachate Collection/Storage System (Permit No. G66132, A/N 613131). The application sought to add up to four 45,000-gallon clarifier tanks and fifty 21,000-gallon frac tanks to the existing Landfill Gas Condensate and Leachate Collection/Storage System.

13. Given the numbers of leachate tanks currently onsite to handle the significantly increased liquids production, Chiquita understands that it needs to submit a further modification application for its Landfill Gas Condensate and Leachate Collection/Storage System permit to revise the equipment description. Chiquita is in the process of preparing this permit modification application.

14. Permit No. G73696, A/N 645450 and A/N 624296 set forth requirements and conditions to operate the landfill gas flare system, consisting of Flare Nos. 1 through 3, among other equipment. Leachate is treated on-site and accumulated in tanks. Many of these tanks are (and eventually all of the tanks will be) under vacuum. Any gases collected from those tanks are routed to the Landfill’s flares. In my estimation, any such gases likely have an insignificant contribution to the flares’ total emissions as I

1 expect them to contain mostly air with low levels of volatilized compounds. I believe that these
2 concentrations will be lower than what is found in the landfill gas that is combusted in the flares.

3 15. Based on conversations with South Coast AQMD technical staff during biweekly virtual
4 conferences, I understand that South Coast AQMD would like Chiquita to also modify its flare system
5 permits to reflect these additional sources of emissions contributions to the flares. My team and I are
6 prepared to address these proposed permit modifications.

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

10 Executed on this 19th day of March 2024, in Sacramento, California.

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14 Patrick Sullivan
15 Senior Vice President
16 SCS Engineers
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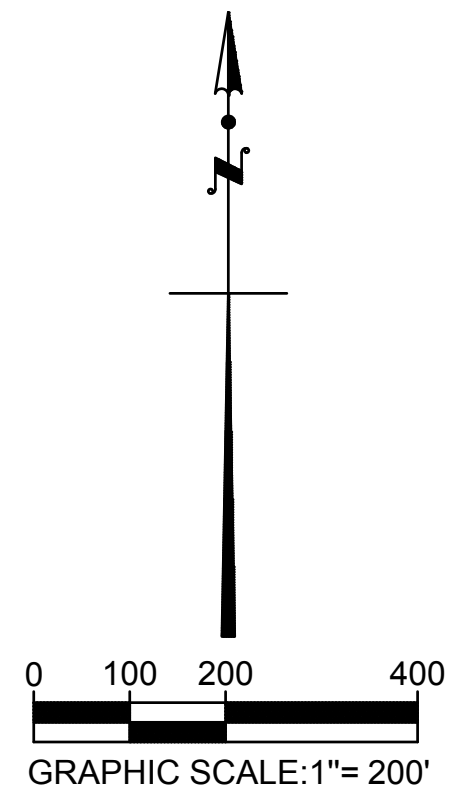
Respondent.

Case No. 6177-4

**EXHIBIT A TO DECLARATION OF
PATRICK SULLIVAN, BCES, CPP,
REPA**

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

Hearing Date: March 21, 2024
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21865 Copley Drive
Diamond Bar, CA 91765



- LEGEND**
- — — — — APPROXIMATE LIMIT OF PROPERTY LINE
 - - - - - REACTION AREA BOUNDARY (APPROXIMATE) - BASED ON DATA REVIEW
 - — — — — REACTION AREA BOUNDARY - CONDITION 9A

CHIQUITA CANYON LANDFILL
FLIGHT DATE: MARCH 5, 2024