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

5 **In The Matter Of**

6 SOUTH COAST AIR QUALITY
7 MANAGEMENT DISTRICT,

8 Petitioner,

9 vs.

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

13 Respondent.

Case No. 6177-4

**DECLARATION OF SRIVIDHYA
VISWANATHAN, P.E.**

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

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15 I, Srividhya Viswanathan, declare as follows:

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

19 **Background and Experience with Chiquita Canyon Landfill**

20 2. As discussed in my prior declarations in this Case No. 6177-4, I serve on the
21 Reaction Committee as the expert on the landfill gas well-field and dewatering. I am a Vice
22 President and Director of Engineering of the Southwest Region of SCS Engineers, Inc. (“SCS”). I
23 have over 17 years of experience in solid waste management services and infrastructure projects. I
24 began working with Chiquita Canyon, LLC (“Chiquita”) in November 2022, primarily advising on
25 Chiquita’s landfill gas well-field and dewatering system. Since then, I have continued working on
26 these components at the Chiquita Canyon Landfill (“Landfill”).

27 3. This declaration is made for the March 21, 2024 hearing on the Modified Stipulated
28 Order for Abatement (“Modified Stipulated Order”).

1 **Changing leachate constituents have slowed dewatering efforts.**

2 4. As discussed in prior hearings before this Hearing Board, Chiquita is experiencing
3 an elevated temperature landfill event, or chemical reaction, within an inactive portion of the waste
4 mass. Chiquita is implementing mitigation measures pursuant to the Modified Stipulated Order,
5 including expanding the landfill gas well collection system by installing new vertical extraction
6 wells and expeditiously dewatering by operating dewatering pumps and following dewatering
7 guidelines that reflect best industry practices.

8 5. Circumstances at the Landfill have changed since the Modified Stipulated Order
9 became effective on January 17, 2024. Recent samples of some of Chiquita's leachate showed
10 levels of certain constituents above their regulatory threshold, meaning that Chiquita could no
11 longer use its regular disposal facilities and hauling companies to dispose of this leachate.

12 6. With no off-site place to dispose of this material, Chiquita began accumulating
13 leachate onsite in tanks to manage the leachate recovered from the Landfill. With a limited number
14 of tanks, Chiquita lacked sufficient capacity to accumulate the total amount of leachate, and thus
15 Chiquita was forced to slow its efforts to remove leachate from the Landfill.

16 7. On February 8, these circumstances required Chiquita to turn off most of the
17 dewatering pumps in the landfill gas wells to slow the rate of leachate accumulation on-site. This
18 amounts to 42 dewatering pumps that were decommissioned out of a total of 44 such pumps.
19 However, Chiquita continued dewatering operations to the maximum extent feasible by also
20 keeping on pumps in sumps around the Landfill perimeter to avoid leachate seeps.

21 **Chiquita is actively pursuing all available options for leachate treatment and disposal to allow**
22 **it to restart more pumps.**

23 8. Under oversight by the California Department of Toxic Substances Control,
24 Chiquita is now accumulating and treating some of this leachate onsite. Because of the on-site
25 treatment, Chiquita has been able to successfully treat and ship some leachate offsite for disposal.

26 9. Chiquita continues to expand its capacity to accumulate this material onsite as an
27 immediate measure to meet leachate generation capacity needs. Prior to the reaction, Chiquita had
28 5 leachate tanks onsite. Chiquita expanded the tank system in 2023 to accommodate the increased

1 liquids production and recovery resulting from the reaction. By the end of 2023, Chiquita had 48
2 tanks onsite. In 2024, Chiquita further rapidly expanded the number of tanks in response to the
3 challenges with disposal options, and as of March 15, 2024, Chiquita had 217 leachate tanks onsite.
4 This expansion is necessary to allow sufficient space for accumulation and treatment while
5 continuing to dewater.

6 10. I understand that Chiquita is also aggressively pursuing treatment options,
7 continuing to improve its current treatment processes, and identifying additional potential offsite
8 disposal facilities. However, until an efficient and effective treatment method can be implemented
9 that will allow for more reliable off-site disposal, Chiquita will need to continue dewatering (i.e.,
10 pulling leachate out of the landfill) at a slower rate because there is simply nowhere for this
11 material to go (there are not enough tanks onsite for accumulation or disposal outlets to direct this
12 leachate).

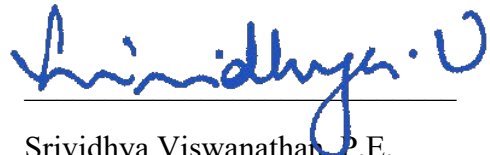
13 11. Chiquita has been preparing in anticipation of being able to restart all dewatering
14 pumps. Once there is adequate capacity for off-site disposal, Chiquita will increase the number of
15 pumps in operation. Chiquita will likely restart the pumps with a phased approach to avoid
16 overwhelming the accumulation and treatment operations. Chiquita will need to carefully calibrate
17 its dewatering operations, which may involve turning certain pumps off for limited periods of time.
18 Once Chiquita has all currently available pumps reinstalled and restarted, Chiquita is prepared to
19 install additional pumps in the Reaction Area.

20 12. As noted above, Chiquita has continued to dewater the Landfill to the maximum
21 extent feasible given this change in circumstances. Chiquita continues to expeditiously dewater and
22 take proactive measures to remove additional liquids in the Reaction Area to limit reaction severity
23 and avoid spread.

24
25 I declare under penalty of perjury under the laws of the State of California that the foregoing
26 is true and correct to my personal knowledge.

27 Executed on this 19th day of March, 2024, in Long Beach, California.

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Srividhya Viswanathan, P.E.
Vice President
SCS Engineers

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