

February 15, 2024

Mr. Baitong Chen
 South Coast Air Quality Management District
 21865 Copley Drive
 Diamond Bar, California 91765

Subject: Reaction Committee Determination on TOX Usage
 Chiquita Canyon Landfill – Castaic, California

Dear Mr. Chen:

In accordance with Condition No. 22 of the Stipulated Order of Abatement (SOFA) pertaining to the Chiquita Canyon Landfill (CCL) (Case No. 6177-4), the Reaction Committee has reviewed the usage of the two portable thermal oxidizer (TOX) units to assist in the processing and destruction of landfill gas (LFG) from the reaction area. Currently, the site operates two (2) TOX units: (1) an Envent unit with the ability to process 1,600 standard cubic feet per minute (scfm) of LFG, and (2) a Zeeco unit with the ability to process 4,700 scfm of LFG. The Reaction Committee finds that the usage of the lower flow, Envent TOX unit, is no longer needed to process, control and destroy the LFG produced from the reaction area. The rationale serving as the basis for removing the Envent TOX includes:

- The installation and operation of the new Flare 3 (FL-2023), which has a capacity of 6,000 scfm.
- The ability of the Zeeco TOX unit to process as much as 4,700 scfm from the reaction area.
- The current maximum expected LFG generation, and the current control capacity of the now three (3) permanent LFG flares and the 4,700 scfm Zeeco TOX is as shown below. Based on this information, there is sufficient capacity with the remaining LFG control devices, with a margin of over 15%, to manage the LFG at CCL.

Year	
LandGEM LFG Generation (2024)	14,000
LFG Generation (Reaction Gas Increase)	16,100
Flare 1 (Flare FL-1995)	4,000
Flare 2 (Flare FL-2009)	4,000
Envent TOX	1,600
Zeeco TOX	4,700
Flare 3 (Flare FL-2023)	6,000
Flare Capacity	20,300
Control Capacity without Envent TOX	18,700




- The running of the LFG collection system utilizing only Flare 2 (FL-2009), Flare 3 (FL-2023), and the Zeeco TOX while the Envent TOX was offline to undergo regular cleaning and maintenance. During the two days of maintenance on the Envent TOX, the system continued to maintain vacuum to the entire wellfield and a reduction in vacuum to LFG wells was not observed. During this time, Flare 1 (FL-1995) was available to startup but was still not needed to process the total gas produced and thus served as a backup while the Envent TOX was offline. This further supports a conclusion that the Envent TOX is not needed.
- There was no dissenting opinion among the Reaction Committee members regarding this determination.

Please contact either of the undersigned if you have questions or require additional information. Based on this information, Chiquita Canyon, LLC plans to take the Envent TOX unit out of service and remove it from the site.

Sincerely,



Robert E. Dick, PE, BCEE
Senior Vice President
SCS Engineers



Patrick S. Sullivan, BCES, CCP
Senior Vice President
SCS Engineers

RED/PSS

cc: Nathaniel Dickel, SCAQMD
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