

March 3, 2025

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 (Landfill) (Case No. 6177-4), the Reaction Committee has reviewed the status of the existing portable thermal oxidizer (TOX) unit to assist in the processing and destruction of landfill gas (LFG) from the reaction area. Currently, the site operates one TOX unit: a Zeeco unit with the ability to process 4,700 standard cubic foot per minute (scfm) of LFG. For the reasons described in this letter, the Reaction Committee finds that additional backup capacity is needed for the Zeeco unit and therefore recommends that Chiquita Canyon, LLC (Chiquita) bring onsite and begin operating an additional TOX unit to serve as backup for the Zeeco unit.

The Reaction Committee previously concluded (by letter dated, February 15, 2024) that a smaller, lower flow Envent TOX unit (1,600 scfm) was no longer needed to process, control and destroy the LFG produced from the reaction area. The rationale stated as the basis for removing the Envent TOX was that the Landfill had sufficient LFG control capacity with the addition of Flare 3 and that the Zeeco unit could handle all of the reaction gas. Further, the flare station was able to act as back-up to the Zeeco unit and process the reaction gas when the Zeeco was offline.

Since that time, an extensive network of piping has been installed on the leachate tanks to remove leachate vapors from the tanks. Those vapors are routed to the flare station and contain very little methane, diluting the overall heat input to the flares. Over 1,000 scfm of leachate vapors are now being processed at the flare station. Because the reaction gas also has low methane content, when the Zeeco TOX is offline and the flares have to process both leachate vapors and reaction gas, they are not able to operate properly and experience more frequent downtime. As such, the flares can no longer operate as reliable backup for the Zeeco TOX.

Because of this new development, the Reaction Committee is now recommending that a second portable TOX unit be brought back on-site to supplement and act as back-up for the Zeeco unit. This will make for a more reliable control system and allow Chiquita to maintain vacuum on the reaction area when the Zeeco is offline for maintenance or other reasons. An additional TOX unit will also supplement the overall control capacity for the site.

There was no dissenting opinion among the Reaction Committee members regarding this determination.



Mr. Baitong Chen  
March 3, 2025  
Page 2

Based on this recommendation, Chiquita is bringing an additional TOX unit on-site and will begin operation once it is on-site and installed. A permit application will be filed for this unit, reflecting the fact that it is initially being installed and operated without a permit to construct and Title V revision. The application will be submitted under accelerated permitting, with expedited processing requested and paid for.

Please contact either of the undersigned if you have questions or require additional information.

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  
Christina Ojeda, SCAQMD  
Pablo Sanchez Soria, PhD, CIH, CTEH  
Neal Bolton, PE, Blue Ridge Services, Inc.  
Richard Pleus, PhD, MS  
Srividhya Viswanathan, PE, SCS Engineers