



# CHIQUITA CANYON

*A Waste Connections Company*

March 24, 2026

***Via E-Mail***

Lizabeth Gomez  
South Coast Air Quality Management District  
21865 Copley Drive  
Diamond Bar, California 91765  
lgomez@aqmd.gov

**Re: Chiquita's Response to South Coast AQMD's March 10, 2026 Letter Regarding Permitting for Various Emissions Control Equipment at the Chiquita Canyon Landfill**

Dear Ms. Gomez:

Chiquita Canyon, LLC (Chiquita) provides this initial response to the items identified in the South Coast Air Quality Management District's (South Coast AQMD's) March 10, 2026 letter regarding permitting for various pieces of emissions control equipment helping to mitigate the reaction at the Chiquita Canyon Landfill (Landfill). As South Coast AQMD is aware, continued operation of flares and thermal oxidizers (TOXs) is crucial to remove heat and prevent fugitive emissions from the Landfill. Chiquita appreciates the time taken by South Coast AQMD to visit the Landfill on March 3 and for the inquiries included in its March 10 letter.

As South Coast AQMD noted, the permitting issues at this site are complex, and Chiquita is still in the process of assessing the various items identified in the March 10 letter. With respect to the meeting requested by South Coast AQMD towards the end of March, Chiquita is willing to engage in such a meeting, but believes that a discussion will be more fruitful after it has had time to (1) further analyze potential emissions from the abatement devices on site (including concluding and receiving data from the source tests being scheduled for the TOXs), and (2) conduct a further evaluation of potential California Environmental Quality Act (CEQA) applicability and review. Some initial responses and reactions are more fully described below. Chiquita looks forward to a continuing dialogue with South Coast AQMD on these topics.

### Flare Operation and Methane Content

South Coast AQMD's letter requested that Chiquita confirm its plans regarding Flares 1 and 4 and the Zeeco/Parnel/Hero TOX units. Chiquita's current plan is that, once installed and operational, Flare 4 will replace Flare 1. Flare 4 will not replace any of the thermal oxidizers (TOXs) currently onsite (Zeeco, Parnel, and Hero). While Flare 4 is being constructed/installed, Chiquita intends to bring in three new TOX units. One will replace the Hero unit, for a total of five TOX units operating during the construction/installation of Flare 4. Once Flare 4 is operational, Chiquita will

decommission the current Zeeco and Parnel units, as well as Flare 1. Long term, Flares 2, 3, and 4, along with the three new TOX units, will operate to control landfill gas generation at the Landfill, with the intention being to decommission the TOX units once the flares are capable of managing the landfill gas generated by the reaction. Chiquita is assessing what modifications, if any, need to be made to the related permit applications.

Chiquita does not anticipate at this time using gas enrichment concerning the flares. While methane content has reduced overall, Chiquita maintains the TOX units onsite to continue processing this low quality gas. And to date, Chiquita's flares have had no issues processing the gas directed to them. Chiquita will be continuing to monitor any trends regarding landfill gas content to determine whether enrichment becomes necessary to maintain temperature.

#### Rule 1325 and Major Source Applicability

Chiquita continues to assess Rule 1325 applicability. As South Coast AQMD is aware, this requires a highly complex legal and technical analysis in the face of rapidly evolving landfill gas control infrastructure necessitated by the Elevated Temperature Landfill (ETLF) event at the Landfill. Chiquita has undertaken extraordinary efforts to address the ETLF event, contain and minimize its spread, and mitigate any potential related impacts, which necessarily included expanding its landfill gas control systems to minimize fugitive emissions of odors and constituents. At the same time, this has complicated the Rule 1325 applicability analysis, including establishing an appropriate baseline for emissions and evaluating the potential to emit from the various control devices. Chiquita will follow-up with South Coast AQMD once it has reached a position on this item.

#### CEQA Analysis

Similar in complexity is the application of CEQA to any permitting efforts targeted at emissions controls at the Landfill. The 2017 EIR prepared for the adoption of Chiquita's most recent Conditional Use Permit contains thousands of pages of analyses, many of which are dedicated to air quality issues. Chiquita will need to evaluate these prior analyses against current operations and anticipated emissions as well as evaluate potential exemptions. Chiquita does note that, given its decision to decommission Flare 1 when Flare 4 becomes operational, overall SCFM throughput to control devices (flares and TOXs) onsite should be similar to that already analyzed in the 2017 EIR.

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Chiquita appreciates South Coast AQMD's dialogue on the issues facing the District as it evaluates Chiquita's various permitting needs. Once Chiquita has further refined its analysis on the above issues, it will be in contact to request the meeting noted in South Coast AQMD's March 10 letter.

Should you have any questions, please feel free to contact me.

Sincerely,



Kevin Green  
District Manager  
Chiquita Canyon Landfill

Cc: Jason Aspell, South Coast AQMD  
Angela Shibata, South Coast AQMD  
Nathaniel Dickel, South Coast AQMD  
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Dylan Smith, Chiquita Canyon  
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