

Archived: Thursday, August 6, 2026 6:45:09 PM
From: [Huber, Rachelle](#)
Sent: Sat, 1 Aug 2026 07:38:14
To: [Baitong Chen](#)
Cc: [Kevin Green](#)
Subject: RE: Chiquita Canyon Landfill (Facility ID 119219) – SOFA Condition 104
Importance: Normal
Sensitivity: None
Attachments: [John Zink Enclosed Flare Low Methane Letter REV0.pdf](#) 

[EXTERNAL SENDER: Use caution with links/attachments]

All –

Please note that Chiquita intended to refer to Condition 104 in the earlier correspondence. The reference to Condition 1 was a typographical error.

Best,

Rachelle Huber
Project Manager

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From: Huber, Rachelle <RHuber@scsengineers.com>
Sent: Friday, July 31, 2026 6:57 PM
To: Baitong Chen <BChen@aqmd.gov>; Larry Israel <lisrael@aqmd.gov>; ndickel@aqmd.gov; Christina Ojeda <cojeda@aqmd.gov>
Cc: Kevin Green <Kevin.Green@WasteConnections.com>; Bill Haley <william.haley@wasteconnections.com>; Sarah Phillips <Sarah.Phillips@WasteConnections.com>; Dylan Smith <Dylan.Smith@WasteConnections.com>; Jones, Art <AJones@scsengineers.com>; Viswanathan, Srividhya <SViswanathan@scsengineers.com>; Sullivan, Pat <PSullivan@SCSEngineers.com>
Subject: Chiquita Canyon Landfill (Facility ID 119219) – SOFA Condition 1

[EXTERNAL SENDER: Use caution with links/attachments]

All,

In accordance with Condition 1 of the Stipulated Order, attached is a letter from John Zink Company LLC concerning the operation of enclosed flares at lower methane concentrations.

Chiquita has also been working with the installer to obtain written confirmation of the minimum landfill gas methane content necessary for Flares 1, 2, and 3 to ensure destruction efficiency of methane and NMOCs consistent with regulatory requirements, as required by Condition 1(a), and the written documentation required by Condition 1(b) regarding the proposed timeline for installation of the supplemental fuel system. The installer has not yet been able to provide the flare-specific minimum methane concentrations or the requested installation timeline. Chiquita will continue working with the installer to obtain that documentation and will provide it to South Coast AQMD as soon as practicable.

Please let us know if you have any questions.

Best,

Rachelle Huber
Project Manager

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July 31, 2026

William Haley
Sr. Project Engineer
Waste Connections

Mr. Haley:

At the request of Waste Connections, this letter addresses the operation of enclosed flares with gas streams approaching methane concentrations less than 30% by volume or lower heating value (LHV) of 275 BTU/SCF.

An enclosed flare burns gas inside a protected combustion chamber to destroy compounds such as methane. As methane content in the gas stream declines, the heating value of the gas decreases. With a lower heating value, less heat is released during combustion. Additionally, when the gas has a lower methane concentration, there is typically more carbon dioxide in the gas which further cools the flame since carbon dioxide is not flammable.

If the heat content from the gas is too low, the flame will not be able to heat the stack to its operating temperature. Effective combustion requires three things: sufficient temperature, enough time at that temperature, and good mixing inside the stack. Of these, maintaining temperature is the biggest challenge for low methane streams. An additional concern surrounding low methane applications is flame stability. As the methane content drops, it becomes more difficult to maintain flame stability because continuous pilots are not present.

Generally, gas streams with methane content less than 30% by volume or with low flowrates may require auxiliary fuel to reliably start combustion and maintain temperature. A table has been included below to provide additional clarity on the operation of enclosed flares with varying methane concentrations.

Methane %	Approximate Lower Heating Value (BTU/SCF)	Enclosed Flare Meets Operational Requirements for Combustion Without Supplemental Fuel	Requires Supplemental Fuel
50	455	Yes with sufficient flow	No
40	365	Yes with sufficient flow	No
35	320	Yes with sufficient flow	No
30	275	Unreliable independent of flow	Potentially
25	230	Not feasible independent of flow	Yes
20	185	Not feasible independent of flow	Yes

Sincerely,

Colten Cates
Applications Engineer
John Zink Company LLC
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