



February 28, 2025

***Via E-Mail***

Eric Morofuji  
Environmental Health Specialist  
Los Angeles County Department of Public Health  
Local Enforcement Agency  
5050 Commerce Drive  
Baldwin Park, California 91706  
[emorofuji@ph.lacounty.gov](mailto:emorofuji@ph.lacounty.gov)

**Re: Chiquita Canyon, LLC Response to LEA's December 24, 2024 Letter  
Regarding Milestone 2B Compliance, Chiquita Canyon Landfill**

Dear Mr. Morofuji:

Chiquita Canyon, LLC (“Chiquita”) submits this letter in response to the December 24, 2024 letter from the Los Angeles County Department of Public Health, Solid Waste Management Program, acting as the Local Enforcement Agency (“LEA”) regarding the LEA’s request to amend Milestone 2B of the June 6, 2024 Compliance Order and request for additional information regarding aerial Forward Looking Infrared (FLIR) surveys and Light Detection and Ranging (LiDAR) maps. Chiquita hereby presents the following response:

**FLIR Surveys**

Chiquita continues to have significant concerns about the reliability and accuracy of the FLIR survey technology for the purpose of identifying fissures and tension cracks, as stated in Chiquita’s initial November 12, 2024 correspondence to the LEA. Nevertheless, Chiquita provides the following responses to the LEA’s FLIR-related requests in its December 24, 2024 letter.

*Request #1: Submit actual reported FLIR GPS coordinates and quantitative thermal data. For each submittal, including the October 1, 2024 survey, investigate and discuss the likely cause of the high temperatures and include photographs of the area with the highest detected thermal data. See the example in the enclosed comment letter from CalRecycle.*

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Chiquita previously investigated and discussed the results of the October 1, 2024 survey performed by Sniffer Robotics, Inc. (“Sniffer”), including the potential causes of certain elevated temperatures observed during the survey, in Chiquita’s November 12, 2024 submittal to the LEA. Chiquita has conducted additional investigation and provided further discussion regarding the results of the October 1, 2024 survey in response to this request. Please see the enclosure. Also included in the enclosure is Sniffer’s *Emission Study Thermal Report*, dated October 2, 2024, which was updated on February 6, 2024 in response to the LEA’s December 24, 2024 correspondence. Sniffer’s updated report includes the requested coordinates, data, and photographs, focusing on the five areas identified by the LEA/CalRecycle and marked as Areas A through E in Figure 1 of CalRecycle’s November 25, 2024 correspondence.

*Request #2: Conduct a background and/or field FLIR survey at Area E between Points 19 and 21, as shown in Figure 1 from the enclosed CalRecycle comment letter, to determine the cause of the elevated surface temperature. Submit a report with analysis and conclusions of the investigation.*

Because Chiquita’s October 1, 2024 FLIR survey included a survey of temperatures in Area E, we interpret this request as seeking further analysis of the elevated temperatures observed in that area and the potential causes of the elevated temperatures. Please refer to the enclosure for additional analysis related to Area E, which is based on data obtained by Sniffer in October 2024. Future FLIR surveys, including Sniffer’s February 2025 FLIR survey, will likewise include additional analysis of Area E.

*Request #3: Provide online access to Sniffer’s Geospatial Portal to view the ArcGIS map and all FLIR temperature data. The GIS file should include separate layers for the gas control system wells and geomembrane liner.*

As previously communicated to the LEA via email, Chiquita is unable to provide online access to the third-party system, nor is it possible to provide real-time access to the data as described in the LEA’s request. If there is certain other data needed to complete your technical review, please explain and we will inquire whether there is a way to provide that data. Chiquita will meanwhile coordinate with Sniffer to conduct the additional FLIR surveys discussed herein and will provide the survey results and analysis of elevated temperatures in Areas A through E pursuant to the LEA’s request.

*Request #4: Collect four (4) additional FLIR surveys in January 2025, March 2025, May 2025, and July 2025 and analyze the cause(s) of high temperatures in areas identified. After July 2025, CCL may request that the LEA reassess the surveys to determine if CCL can submit on a quarterly basis.*

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Chiquita reported to the LEA last month that Sniffer was unable to complete its FLIR survey flight for January 2025 as a result of the proximity of the Hughes Fire and the related January 22 evacuation warning issued by the California Department of Forestry and Fire Protection. Sniffer rescheduled and performed the survey in early February 2025 and is in the process of preparing the report. Once Sniffer finalizes the report, Chiquita will investigate and analyze the survey results for Areas A through E. We anticipate being able to provide this report during the second week of March. Given the delay caused by the Hughes Fire and the related evacuation, as well as the resulting rescheduling of the January 2025 survey to February 2025, Chiquita requests that the remaining three FLIR surveys be conducted in April 2025, June 2025, and August 2025. Chiquita generally anticipates submitting these reports in the middle of the month following the date the survey is conducted.

*Request #5: All FLIR surveys should be kept on-site and provided to local emergency responders to be informed and aware of elevated temperatures.*

All FLIR surveys will be kept on-site and provided to local emergency responders upon request or in the event of an emergency. In addition, Chiquita keeps the Landfill's Emergency Response Plan and Health and Safety Plans on site and has provided copies to local emergency responders. These plans identify the presence of elevated temperatures and potential related hazards at the Landfill.

## **LiDAR Maps**

*Request #6: In addition to FLIR surveys, LiDAR surveys should be used when assessing the magnitude and intensity of SET Events. Submit iso-settlement maps for the reaction area based on LiDAR Maps that CCL has produced from July 2022 to the present date. Submit the iso-settlement maps and analysis on a monthly basis.*

Chiquita previously clarified in its November 12, 2024 response to the LEA's September 11, 2024 request for LiDAR maps that LiDAR technology will not penetrate the geosynthetic cover and is therefore not capable of satisfying the LEA's request to identify settlement under the geosynthetic cover. Chiquita clarified further in its November 27, 2024 email to the LEA's November 20, 2024 request for historic LiDAR maps that Chiquita has never performed LiDAR mapping and therefore could not fulfill the LEA's request. The LEA confirmed via email on December 3, 2024 that Chiquita could submit quarterly isometric settlement maps in lieu of LiDAR surveys/maps. Chiquita accordingly submitted quarterly maps for first quarter 2022 to third quarter 2024 to the LEA on December 10, 2024, and submitted a quarterly map for fourth quarter 2024 on January 14, 2025.

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Please let us know if you have any questions or would like to have a call to discuss.

Regards,

*Steven J Cassulo*

Steve Cassulo  
District Manager  
Chiquita Canyon, LLC

Enclosure: Chiquita Canyon, LLC Analysis of October 1, 2024 FLIR Survey in Response to the December 24, 2024 LEA Letter Regarding Milestone 2B Compliance, attaching Sniffer Robotics, Inc. Emission Study Thermal Report, dated October 2, 2024 (updated February 6, 2024)

cc: John Perkey, Waste Connections  
Robert Ragland, Los Angeles County Department of Public Health  
Liza Frias, Los Angeles County Department of Public Health  
Nichole Quick, M.D., Los Angeles County Department of Public Health  
Shikari Nakagawa-Ota, Los Angeles County Department of Public Health  
Robert Ragland, Los Angeles County Department of Public Health  
Mark Como, Los Angeles County Department of Public Health  
Ken Habaradas, Los Angeles County LEA  
Karen Gork, Los Angeles County LEA  
Renee Jensen, LEA Counsel  
Blaine McPhillips, Senior Deputy County Counsel  
Emiko Thompson, Los Angeles County Department of Public Works  
Alex Garcia, Los Angeles County Department of Regional Planning  
Ai-Viet Huynh, Los Angeles County Department of Regional Planning  
Wes Mindermann, CalRecycle  
Rachel Beck, CalRecycle  
Todd Thalhamer, CalRecycle  
Mark Debie, CalRecycle  
Jeff Lindberg California Air Resources Board  
Nancy Fletcher, California Air Resources Board  
Jack Cheng, South Coast Air Quality Management Board  
Larry Israel, South Coast Air Quality Management Board  
Enrique Casas, Los Angeles Regional Water Quality Control Board  
Milasol Gaslan, Los Angeles Regional Water Quality Control Board

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Terrence Mann, South Coast AQMD

Tyler Holybee, United States Environmental Protection Agency

Allison Watanabe, United States Environmental Protection Agency

Laura Friedl, United States Environmental Protection Agency

Trevor Anderson, California DTSC