



March 14, 2025

VIA E-MAIL

Mr. Eric Morofuji
Solid Waste Management Program
Local Enforcement Agency
5050 Commerce Drive
Baldwin Park, CA 91706

Subject: Response to LEA's February 21, 2025 Information Request Regarding CCL's November 18, 2024 Proposed Revised Remediation Plan

Dear Mr. Morofuji:

On September 25, 2024, Chiquita Canyon, LLC (Chiquita) requested from the Los Angeles County Department of Public Health, Solid Waste Management Program, acting as the Local Enforcement Agency (LEA), an extension of the 120-day compliance period set forth in Milestone 4-4 of the LEA's June 6, 2024 Compliance Order (LEA Compliance Order). The LEA denied Chiquita's extension request in its October 11, 2024 response but indicated that Chiquita may amend the existing approved Remediation Plan or propose a new Remediation Plan for monitoring probes GP-13 and GP-15 at the Chiquita Canyon Landfill (Landfill) to comply with 27 CCR Section 20750. Chiquita accordingly submitted a Proposed Revised Remediation Plan (Revised Plan) to the LEA on November 18, 2024. The LEA responded on February 21, 2025, requesting additional information. Chiquita submits the below additional information in response to the LEA's February 21, 2025 letter.

Request No. 1: Provide the status of installation and completion of permanent piping, which was planned after the completion of the geosynthetic cover on the west slope, as detailed in Item 2 in the Revised Plan.

The permanent piping along the west slope of the Landfill is ongoing and expected to be complete by March 31, 2025, weather permitting. Additionally, construction of additional north slope landfill gas (LFG) headers and an additional rental flare is still underway and is also expected to be completed by March 31, 2025. As noted in the approved February 2024 Remediation Plan and the Revised Plan, the new header system will provide additional vacuum to the now installed LFG extraction wells and the existing SVE wells. The new flare will provide additional blower capacity to increase the vacuum applied to the new headers.

Request No. 2: Provide more information to justify the timeline on the installation and completion of the six (6) new Soil Vapor Extraction (SVE) wells.

The new SVE wells could not be installed until the completion of the west and north toe termination activities as the construction of the toe termination projects required the perimeter road. The SVEs

must be located in the perimeter road as the road is the only viable location between the edge of the waste boundary and the existing GP-13 and GP-15. The west and north slope toe termination projects are now complete. The construction of up to six (6) SVE wells will commence after the completion of all items listed in Chiquita's above response to Request No. 1. It is estimated that construction of the SVE wells will take approximately four (4) to six (6) weeks in total from the start of installation.

Request No. 3: Install all new SVE wells to the maximum depth of GP-13 and GP-15, or deeper if the depth of the base liner exceeds the depth of GP-13 and GP-15.

Currently, the maximum depth of GP-13 is 172 feet and the maximum depth of GP-15 is 110 feet. Each new SVE well will be installed to a maximum depth of its adjacent probe (GP-13 or GP-15) or to a maximum depth of the base liner, whichever is deeper at the time of installation of the respective SVE.

Request No. 4: Provide a description of the nature and source (migration pathway) of the problem causing the methane exceedance. The information is necessary for evaluating the mitigation measures proposed in the Revised Plan.

The exact migration pathway of the methane causing the methane exceedance is unknown. Other than these methane exceedances, there is no indication of possible damage to the geosynthetic liner, and no feasible way to excavate the liner system to inspect for damage without negatively impacting safety and public health. The only viable solution is to intercept possible methane gas migration with new SVE wells until LFG extraction is able to collect the LFG from deeper depths.

Request No. 5: Provide cross-sectional figures showing GP-13 and GP-15 in relation to the landfill, including, but not limited to:

- i) Geological strata;*
- ii) Depth of waste/base liner;*
- iii) Existing and proposed SVE wells; and*
- iv) Existing LFG extraction wells.*

Chiquita does not believe that the requested cross-sectional figures will be useful or informative in evaluating the methane exceedances. The cross-sectional figures would show the depth of the probes versus the SVE wells, versus the Landfill bottom, while Request No. 3 already requires the SVE wells to be installed to the maximum depth of GP-13 and GP-15, or deeper if the depth of the base liner exceeds the depth of GP-13 and GP-15. Moreover, existing geological strata information is not available as the original geological borings of the probes do not exist. The geological strata could only be available after drilling of the new SVE wells.

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If you have any questions, please do not hesitate to contact the undersigned at (661) 371-9214.

Sincerely,

Steven J Cassulo

Steve Cassulo
District Manager
Chiquita Canyon, LLC

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