

June 2, 2025

Mr. Eric Morofuji
Solid Waste Management Branch
Engineering Support Branch
Los Angeles County Department of Public Health (LEA)
1001 I Street
Sacramento, CA 95814

Subject: Proposed Revised Remediation Plan in Response to May 1, 2025 LEA Letter

Dear Mr. Morofuji:

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) on September 25, 2024. The LEA denied Chiquita's extension request in its October 11, 2024 response but indicated that Chiquita may amend the existing approved Remediation Plan dated February 27, 2024 (February 2024 Remediation Plan) or propose a new Remediation Plan to reduce methane concentrations to comply with 27 CCR Section 20750. Chiquita provided a Revised Remediation Plan to the LEA on November 18, 2024 and requested a time extension of the compliance period until April 18, 2025. The LEA requested additional information on February 21, 2025. Chiquita submitted the additional requested information to the LEA on March 14, 2025. The LEA responded on May 1, 2025 requiring further revisions to the Revised Remediation Plan.

Chiquita submits this Proposed Revised Remediation Plan, which incorporates and updates Chiquita's November 18, 2024 and March 14, 2025 correspondence to the LEA response.

Item 1: Since the Revised Plan includes design aspects of a gas control system, the Revised Plan needs to be prepared and certified by a registered civil or mechanical engineer in accordance with 27 CCR 20937.

This Revised Remediation Plan was prepared and certified by a registered civil engineer and the SVE drawings in **Attachment A** were prepared under the supervision of and signed by a registered civil engineer.

Item 2: Provide a map showing the locations and design details for the proposed new soil vapor extraction (SVE) wells to the LEA for review and approval prior to installation. CCL shall ensure that the perimeter monitoring wells are not located within the radius of influence from the SVE wells to prevent the monitoring results from being affected. Please see the

enclosed CalRecycle's comment letter dated April 15, 2025 (Comment Letter) for additional comments regarding the use of the SVE wells.

A map of the approximate locations of the proposed new soil vapor extraction (SVE) wells is included in **Attachment A**. The exact radius of influence of the new SVE wells cannot be calculated due to unknowns in the exact geological strata that will be encountered during drilling. As shown in Attachment A, the new SVE wells will be positioned further away from the existing probes and closer to the waste than the existing SVE wells, thereby reducing the possibility of influence on the perimeter monitoring probes from what is currently installed. Additionally, in order to comply with Title 27 CCR, the perimeter monitoring probes are within 100 feet of the edge of waste; because of this, the maximum possible distance between the monitoring probes and the SVE wells is limited. Upon further consideration of these details as well as CalRecycle's comments, the maximum number of SVEs possible is limited to two (2) locations, each with two SVEs positioned at different depths within the same borehole, for a total of four (4) SVEs. This number of wells is sufficient to collect the LFG migration prior to the compliance boundary. A drawing showing the distance between the edge of waste, monitoring probes, existing SVE wells, and proposed new SVE wells is provided in Attachment A.

Item 3: *As requested in the LEA's February 21, 2025 Response Letter, 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.*

In addition to the discussion provided in our March 14, 2025 response to the LEA's February 21, 2025 letter, we respond herein that due to the methane content within the perimeter monitoring probes being higher than the nearby reaction gas generated by the elevated temperature landfill (ETLF) reaction, the methane exceedances are unlikely to be caused by reaction gas. If the exceedances were due to the reaction gas, the content of methane in the probes would be lower due to the nearby wells and landfill having lower methane content than within the probe. It is therefore assumed that the typical LFG composition causing methane exceedances in the probes is due to LFG undergoing normal methanogenesis in deeper waste beneath the ETLF reaction. Due to the pressure and liquids in the ETLF reaction above this deeper waste, the LFG is being prevented from reaching the LFG extraction wells situated above the reaction area. This build-up of LFG pressure is likely migrating through the liner by gas diffusion and then migrating through the geological strata to the monitoring probes as noted in "Methane Gas migration through geomembranes" T. D. Stark and H. Choi, 2005.

CCL requests additional information on the type of "down well" monitoring that was separately requested by CalRecycle's letter. Due to the reaction, not all monitoring is safely possible in the wells listed.

Item 4: *As requested in the LEA's February 21, 2025 Response Letter, provide cross-sectional figures showing GP-13 and GP-15 in relation to the landfill, including, but not limited to:*

- i. *Geological strata;*

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

Cross sections showing GP-13 and GP-15, Geological strata, depth of waste/baseliner, existing and proposed SVE wells, and existing LFG extraction wells are included in **Attachment A**. These details and locations are subject to change at the time of construction due to possible construction or safety issues that could be encountered during drilling or mobilization.

If you have any questions, please do not hesitate to contact the undersigned at (626) 609-9188.

Sincerely,



Jenny Kim, P.E.
Project Manager
SCS Engineers



Bill Haley, P.E.
Project Director
SCS Engineers

Attachments:

Attachment A – Map and Cross-Sectional Figures

cc: Kate Logan, Waste Connections
 Nicole Ward, Waste Connections
 Steve Cassulo, Waste Connections
 Amanda Froman, 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
 Ken Habaradas, Los Angeles County Department of Public Health
 Karen Gork, LEA
 Renee Jensen, LEA Counsel
 Blaine McPhillips, County Counsel

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Emiko Thompson, Los Angeles County Public Works

Alex Garcia, Los Angeles County Department of Regional Planning

Ai-Viet Huynh, Los Angeles County Department of Regional Planning

Wes Mindermann, CalRecycle

Jeff Lindberg, California Air Resources Board

Jack Cheng, South Coast Air Quality Management District

Larry Israel, South Coast Air Quality Management District

Enrique Casas, Los Angeles Regional Water Quality Control Board

Tyler Holybee, United States Environmental Protection Agency

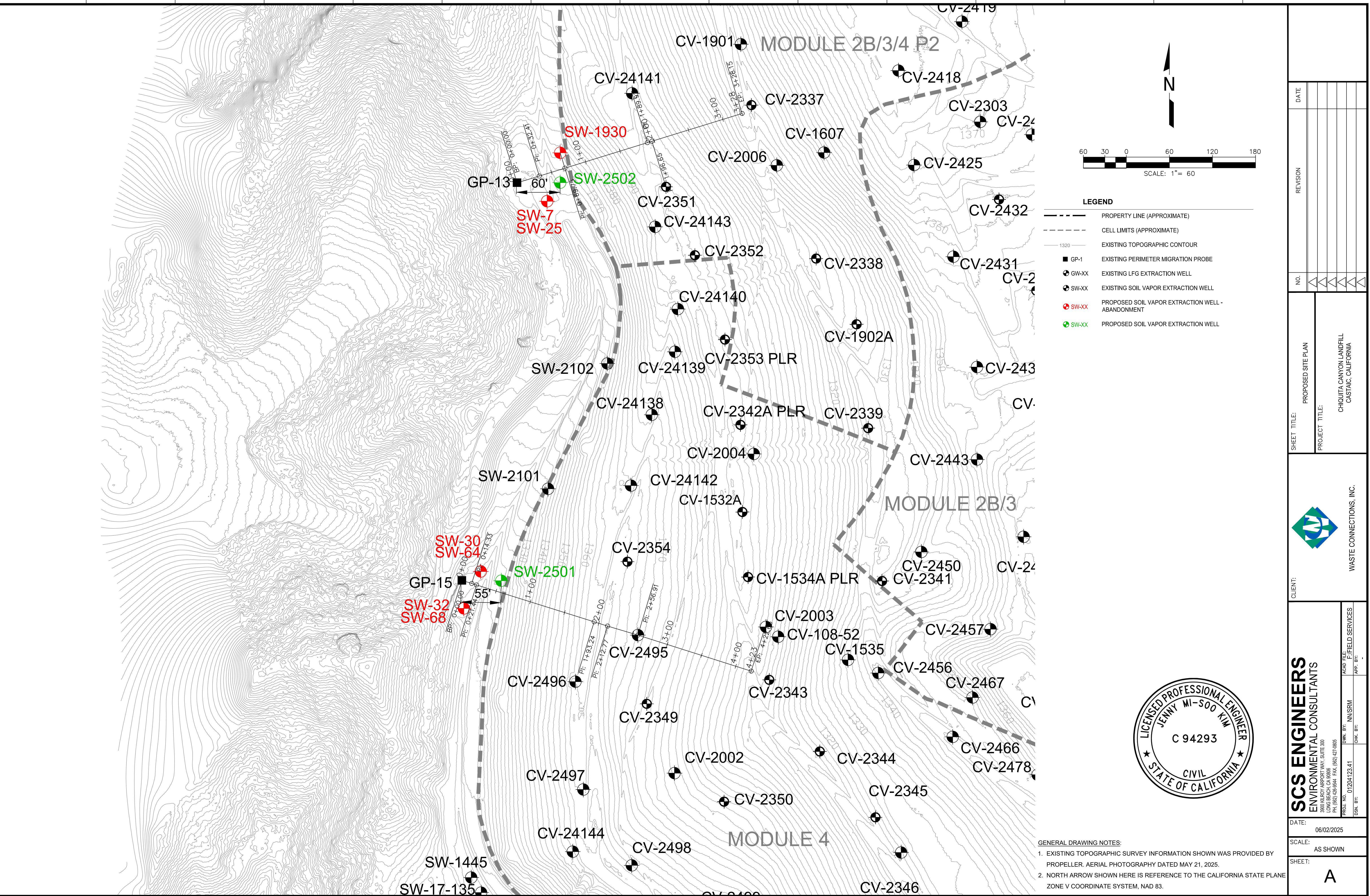
Mark Anthony Relon, United States Environmental Protection Agency

Laura Friedli, United States Environmental Protection Agency

Joshua Wirtschafter, United States Environmental Protection Agency

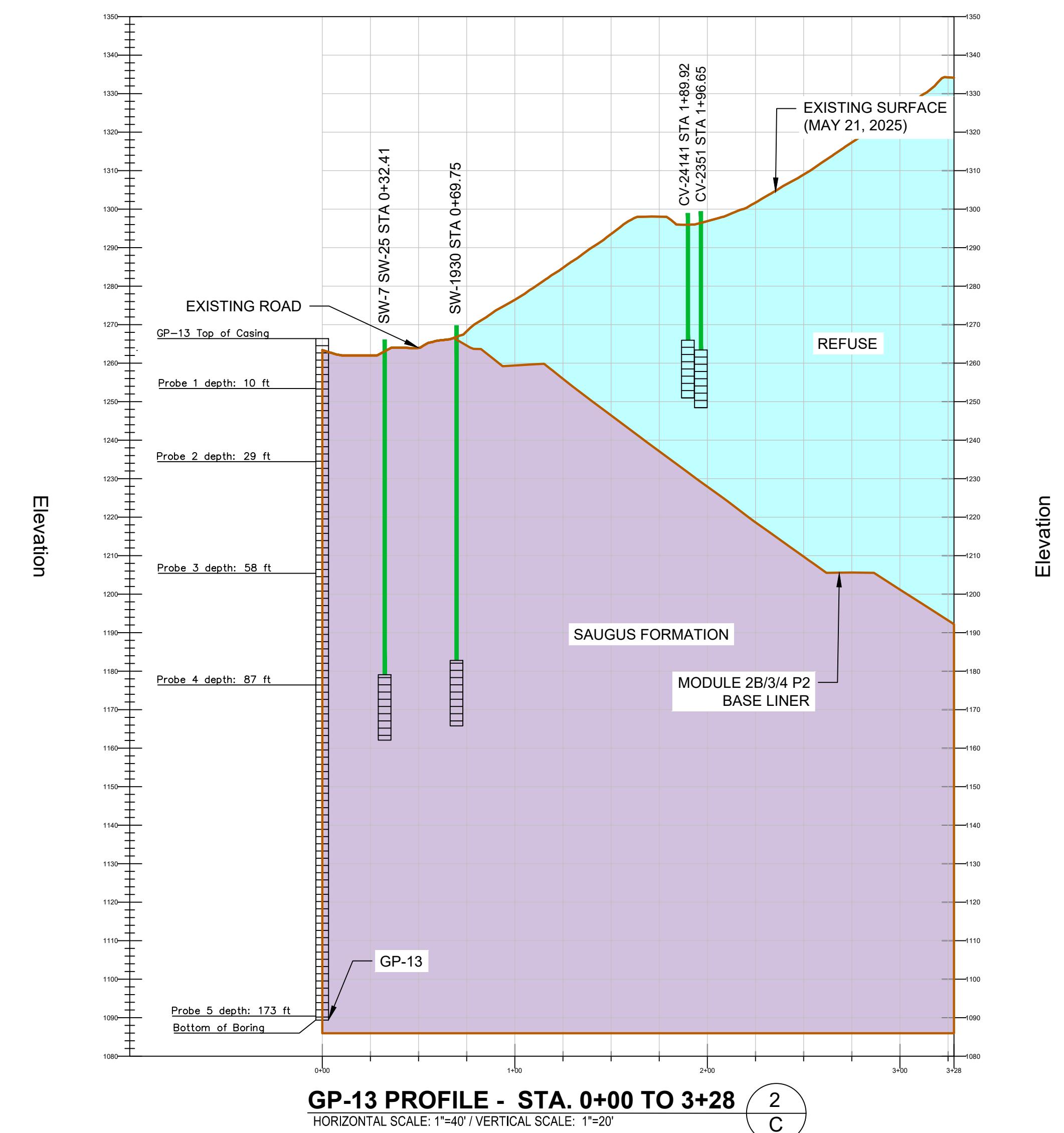
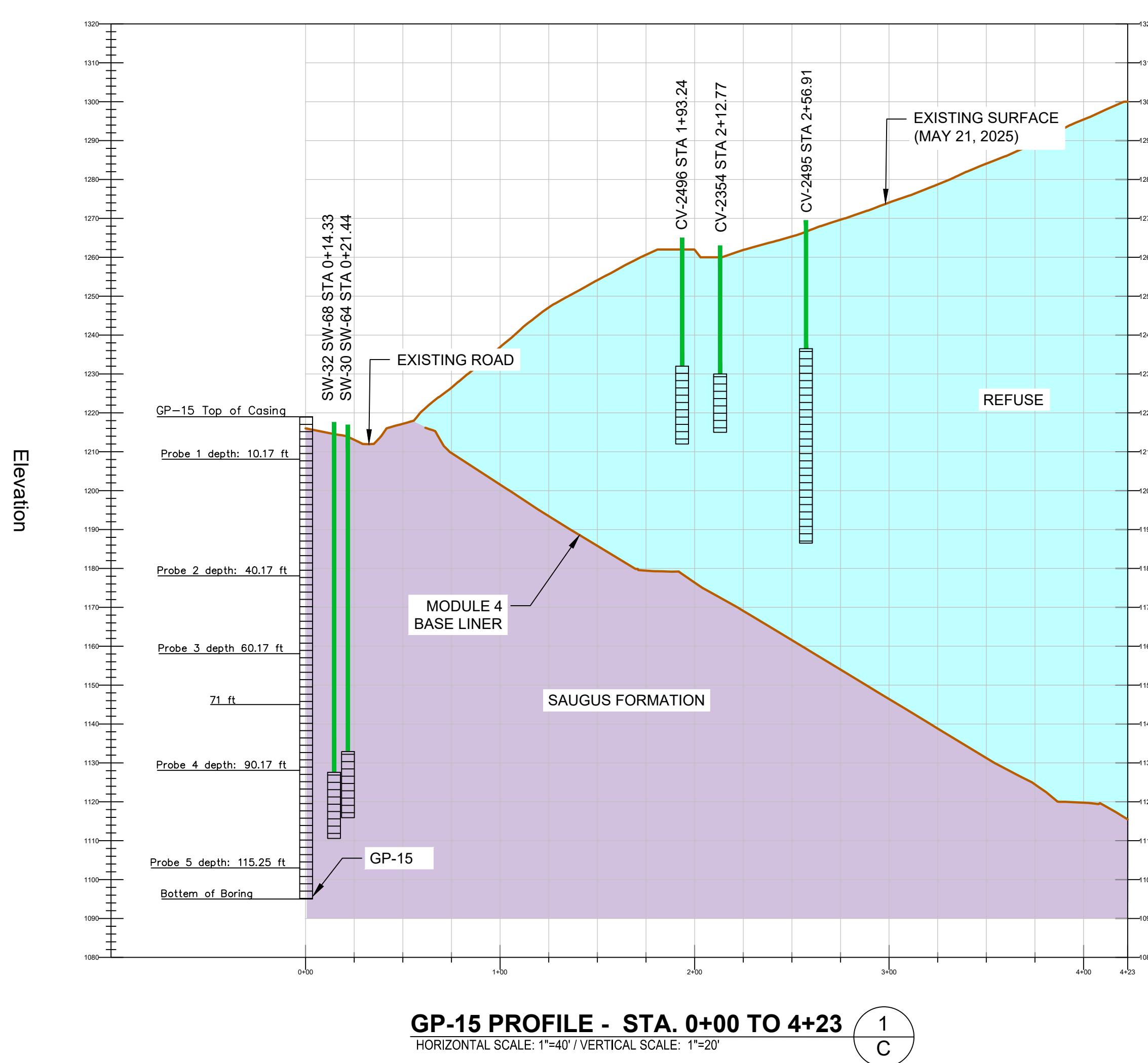
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SCS ENGINEERS
ENVIRONMENTAL CONSULTANTS

DATE: 06/02/2025

SCALE: AS SHOWN

SHEET: C

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LONG BEACH, CA 90806
PH: 562/425-8544 FAX: 562/427-0605

PROJ. NO. 01204123-41

DSN. BY:

CHK. BY:

APP. BY:

EFIELD SERVICES

NO.

REVISION

DATE

PROJECT TITLE:

CHIQUITA CANYON CASTAC, CALIFORNIA



WASTE CONNECTIONS, INC.

