



REGION 9

SAN FRANCISCO, CA 94105

March 4, 2025

Mr. Steve Cassulo
District Manager
Chiquita Canyon, LLC
29201 Henry Mayo Drive
Castaic, CA 91384-2705

Dear Mr. Cassulo:

On March 27, 2024, the U.S. Environmental Protection Agency ("EPA") received the Temperature Monitoring Plan (the "Plan"), submitted as Attachment F to the Master Work Plan submitted by Chiquita Canyon, LLC ("CCL") pursuant to that certain Unilateral Administrative Order, EPA Docket No. RCRA 7003-09-2024-0001 and CERCLA 106-09-2024-05, In the Matter of Chiquita Canyon, LLC, issued February 21, 2024 (the "UAO"). On June 26, 2024, EPA provided a Notice of Deficiency to the Plan. On July 17, 2024, EPA received a letter from CCL regarding the resubmission of the Plan and a revised Copy of the Plan (the "Revised Plan").

EPA has reviewed the Revised Plan, and in accordance with Paragraph 31 of the UAO, EPA approves the submission, subject to the following conditions. Where the conditions of acceptance of a portion of the Revised Plan require modification(s) of the Revised Plan, CCL shall, within ten (10) business days of this notice (unless otherwise agreed in writing by EPA), resubmit the deliverable to EPA with the required modification(s).

- I. Conditions to EPA's approval of "Revised Temperature Monitoring Workplan" Section
 - a. In its July 17, 2024, Notice of Deficiency to the Plan, EPA directed CCL to "update the Plan to outline the actions that have been taken, or are to be taken, to meet Milestone 1B-4 as set forth in the Compliance Order issued on June 6, 2024, by the Los Angeles County Department of Public Health Solid Waste Management Program, acting as the local enforcement agency ('LEA') and as modified by LEA in its response to CCL's 'Response to LEA's review of the weekly update on the Temperature Monitoring Plan for Mitigation Measure #1B at the Chiquita Canyon Landfill, Castaic, California,' dated June 12, 2024." In response, CCL revised the Plan to indicate that CCL proposed in its July 8, 2024 Revised Soil Reaction Break/Barrier Plan submitted to EPA and the LEA "the installation of an additional 14 TMPs," in addition to the twenty (20) TMPs installed at the landfill as of April 30, 2024, and in lieu of the three (3) additional TMPs that the LEA

directed CCL to consider in the LEA's June 6, 2024 Compliance Order. EPA understands that on January 10, 2025, the LEA issued a letter, "LEA Response to Chiquita Canyon Landfill's Request to not install the three temperature monitoring probes – Milestone 1B-4 of the LEA June 6, 2024 Compliance Order," to CCL that stated that CCL is not required to proceed with the installation of the three (3) additional TMPs that the LEA directed CCL to consider in the LEA's June 6, 2024 Compliance Order, contingent on CCL's installation of the fifteen (15) TMPs approved and referred to in the LEA's letters dated September 24, 2024, December 24, 2024, and December 30, 2024. CCL shall install the fifteen (15) TMPs as directed in the LEA's January 10, 2025, communication, notwithstanding whether CCL's Revised Soil Reaction Break/Barrier Plan is approved.

II. Conditions to EPA's approval of "Temperature Data and Design Thresholds" Section

- a. EPA understands from its review of CCL's December 6, 2024, letter, "Response to Leachate Unit November 2024 Requests for Maps and Information Concerning Wells and Pumps at Chiquita Canyon Landfill," and EPA's videoconference with CCL on December 20, 2024, regarding wells and pumps, that CCL is transitioning pneumatic pump technology to Lorentz pump technology and has been implementing modified Lorentz pump technology at the landfill. Specifically, CCL's December 6, 2024, letter states that two models of pneumatic pumps are being installed and operated at the landfill: "QED Environmental Systems' AutoPump AP4 Ultra High-Temperature," and "Pump One Environmental's One Pump (#2000454)," and that three models of Lorentz pumps are being installed and operated at the landfill: "PS2-1800 HRE-07 Energy-1T," "PS2-4000 HRE-32 Energy-1T," and "PS2-4000 HRE-07 Energy-1BR." Please confirm whether the table presenting design temperature thresholds for "existing and planned liquid collection equipment to be used in the Reaction Area," in the Revised Plan includes the design temperature thresholds for any pump technology materials and/or equipment installed and/or operated at the landfill, including the pump models specified in the CCL's December 6, 2024, letter. If the table does not include the design temperature thresholds for any pump technology materials and/or equipment, CCL shall modify the table by including the design temperature thresholds for any pump technology materials and/or equipment.

EPA retains the right to modify or develop the Plan and the UAO.

If you have any questions or comments regarding this letter, please contact Laura Friedli, EPA Attorney Advisor, at (415) 972-3325 or Friedli.Laura@epa.gov.

Sincerely,

Tyler Holybee
EPA Project Coordinator

Enclosures

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