

October 1, 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: Response to LEA Comments on the Proposed Revised Remediation Plan for Perimeter Monitoring Wells at GP-13 and GP-15 at Chiquita Canyon Landfill**

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 submitted the Proposed Revised Remediation Plan to the LEA on June 2, 2025 and the LEA approved the Plan by letter dated August 5, 2025, contingent on the four items below. Chiquita responds to each of those four items, as follows:

***Item 1: Submit as-built drawings for the newly installed soil vapor extraction (SVE) wells, including an updated Sheet C of the Revised Plan showing a cross section with well locations and screening depths.***

After installation of the SVE wells is completed, as-built drawings of the installed SVE wells, including updated cross sections with well locations, completion materials and screening depths, will be submitted to the LEA. The SVE wells are currently planned to begin installation on October 8th and to be installed and online in November.

***Item 2: SVE wells shall be used for only a limited time. The wells must be properly decommissioned once the gas collection and control system (GCCS) demonstrates adequate control of LFG.***

After adequate control of the LFG is demonstrated, the SVE wells will be decommissioned by removing the wellheads and vacuum lines to the SVE's and capping the SVE wells themselves. The SVE wells will remain capped, offline and decommissioned as long as adequate LFG control remains.

*Item 3: Monitor GP-13 and GP-15 for potential negative pressure generated from the SVE wells during regularly scheduled monitoring.*

GP-13 and GP-15 will be monitored for negative pressure and trends in pressure evaluated and compared to previous data from prior to operation of the SVE wells during regular monitoring after the SVE wells have been installed and begun operating.

*Item 4: Continue weekly monitoring of GP-13 and GP-15. A 120-day monitoring period to determine compliance will begin following completion of the remediation measures described in the Revised Plan. If the LEA's monitoring confirms that methane concentrations are below the regulatory limit of 5% by volume in air for three (3) consecutive LEA monitoring events, and the weekly monitoring results submitted by CCL support that methane is being controlled and is not exceeding 5% by volume in air at the site perimeter, then CCL will be considered in compliance with 27 CCR § 20921. If compliance is not achieved within the 120-day monitoring period, a new remediation plan must be submitted to the LEA for review and approval within 30 calendar days. Weekly monitoring must continue until LEA provides direction otherwise.*

Chiquita has been, and will continue to, conduct weekly monitoring of GP-13 and GP-15 to monitor compliance with the regulatory limit of 5% by volume in air at the site perimeter. After the remediation measures including the installation of the SVE wells described in Chiquita's June 2, 2025 Proposed Revised Remediation Plan are completed and the subsequent 120-day monitoring period has concluded, if the methane concentrations from GP-13 and GP-15 remain above the regulatory limit, then Chiquita will confer with the LEA on a revised remediation plan.

In addition to the four items described above, the LEA requested the following actions to "better understand the nature and extent of the LFG exceedance issue at GP-13 and GP-15 in accordance with 27 CCR § 20937(a)(3) and support the development of a long-term corrective strategy." Chiquita responds as follows:

*CCL must conduct down well temperature monitoring at 10-foot intervals in CV 24141, 24139, 2351, 2354, and 2496. If monitoring is not possible due to safety concerns, a written explanation and any supporting information must be submitted to the LEA.*

Chiquita has conducted down well temperature monitoring at 10-foot intervals in CV 24141, 24139, 2351, 2354, and 2496 and has provided the results in **Attachment A**. As noted in **Attachment A**, CV-2351 is silted in at 12 feet deep; therefore, temperatures were not available past 10 feet.

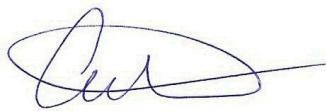
*CCL must also provide more information on why oxygen levels exceed 5% in this area, including an evaluation of well seal integrity, particularly beneath the geomembrane, and an assessment of whether any wellbore seals may be damaged and in need of repair.*

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While high O2 levels have been noted in wells CV-2351 and CV-24139, no other nearby wells have noted high O2 levels during the weekly monitoring of wells in the area. CV-2351 is observed to be silted in at 12 feet and as such O2 levels are near atmosphere as no LFG is moving from the well. CV-24139 is noted to be watered in and also showing atmospheric O2 levels since no LFG is able to move to the well. Because these wells are impacted by silt and liquids blocking the perforations, no gas is able to move to the well. This is verified by the ambient instrument readings which indicate that no atmospheric gas is coming through the waste mass. To evaluate the well seals, the area of the geomembrane cover around each well would have to be cut and removed, and then roads constructed to the wells to facilitate the excavation around the wells. This removal of the cover and excavation into the west slope area poses potential health and safety risks to both workers on site and the broader community and is unnecessary. Chiquita instead proposes to continue to evaluate potential leaks through its weekly RES flyovers. Any leaks coming through the liner would be found and evaluated during the weekly RES flyovers, and no leaks have been noted in the area of these wells. As such there is no evidence of well seal integrity issues for CV-2351 or CV-24139 and removal of geosynthetic cover and west slope excavations would provide no benefit to the silted or watered in wells while causing health and safety risks.

If you have any questions, please do not hesitate to contact the undersigned at (303) 519-4503.

Sincerely,



Art Jones.  
Vice President  
SCS Engineers



Bill Haley, P.E.  
Project Director  
SCS Engineers

Attachments:

Attachment A – Down well temperature measurements

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

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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  
Joel Jones, United States Environmental Protection Agency  
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

**August 2025 Downhole Temperature Monitoring Results**  
**Chiquita Canyon Landfill**

Point Name	Record Date	Ground Surface Elevation (MSL)	TOC to Ground Surface (FT)	TOC to Liquid (FT)	TOC to BOW or Obstr (FT)	Liquid Depth (FT)	Temp (F) @ 10 FT from TOC	Temp (F) @ 20 FT from TOC	Temp (F) @ 30 FT from TOC	Temp (F) @ 40 FT from TOC	Temp (F) @ 50 FT from TOC	Temp (F) @ 60 FT from TOC	Liquid Comments
CV-24096	8/18/2025 15:16	1249.32	4	16	55	39	121.00	122.00	122.00	124.00	123.00	123.00	
CV-24139	8/18/2025 13:13	1274.28	3	20	36	16	174	192	199	184			
CV-24141	8/18/2025 14:30	1295.26	8	30	40	10	113	114	115	115			
CV-2351	8/19/2025 11:08	1288	8	10	12	2	92						Well is blocked at 12' from top of casing with silt.
CV-2354	8/18/2025 14:15	1263	7	12	50	38	191	192	194	193	188		