

Chiquita Canyon, LLC Response to LEA Comments on Revised Draft RAW

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Via E-Mail

Eric Morofuji, EHS III
Los Angeles County Department of Public Health
Solid Waste Management Program
Local Enforcement Agency
Environmental Programs Division
5050 Commerce Drive,
Baldwin Park, California 91706
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Re: Chiquita Canyon, LLC Response to LEA's Comments on the Revised Draft Removal Action Workplan: Extension of Covered Area – LEA Compliance Order, May 1, 2025

Dear Mr. Morofuji:

Chiquita Canyon LLC (Chiquita) submits this response to the Local Enforcement Agency's (LEA) November 20, 2025 letter providing comments on Chiquita's revised draft Removal Action Workplan (RAW) for Extension of Covered Area, resubmitted on October 3, 2025, pursuant to section 4.1 of the LEA's Compliance Order issued on May 1, 2025, and Chiquita's response letters dated August 15, 2025 and August 18, 2025.

The revised draft RAW detailed Chiquita's plan to expand the area of the Chiquita Canyon Landfill (the Landfill) covered by 30-mil high density polyethylene (HDPE) geomembrane in accordance with the requirements of the United States Environmental Protection Agency's (EPA) Unilateral Administrative Order (UAO) issued on February 21, 2024, the South Coast Air Quality Management District's (SCAQMD) Stipulated Order for Abatement (SOFA) issued on November 13, 2024, and most recently modified on December 10, 2025, and the LEA's Compliance Order issued on June 6, 2024. This cover expansion will also supplement the area of the Landfill covered by 40-mil HDPE geomembrane in accordance with the west toe drain workplan. The revised draft RAW detailed Chiquita's process of installing additional geomembrane cover that is at least 60-mil thick, made from HDPE with an inner core of ethylene vinyl alcohol (EVOH) barrier resin, tan in color, and textured on both sides.

The LEA's November 20, 2025 letter directs Chiquita to install the approved geomembrane cover "over the entire facility where waste is disposed (Main Canyon waste management area)" by

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August 31, 2026, to continue to install the approved cover during the winter months, and to provide an estimated cover installation schedule by December 15, 2025.

Chiquita disputes the LEA's rationale for requiring cover over the Main Canyon by August 31, 2026. Such an aggressive installation schedule is infeasible to safely and effectively deploy the remainder of the geomembrane cover, and covering the entire Main Canyon is an unnecessary and surprising change from the portion of the Landfill that Chiquita originally discussed covering. Pursuant to DTSC's Imminent and Substantial Endangerment Determination and Order (Order) and subsequent communications with EPA and the LEA, Chiquita had discussed covering 100 acres of the Landfill with geomembrane cover. These 100 acres do not include covering the tank farms or other areas, which Chiquita does not intend to cover now. Not only has the LEA moved the goal posts by unilaterally requiring the deployment of more geomembrane cover than previously agreed, but it has also imposed a deployment schedule that does not consider the multitude of complexities and pitfalls about which Chiquita has informed its regulators on several occasions. For the reasons described herein, in Chiquita's letters to EPA dated August 15, 2025 and to the Department of Toxic Substances Control (DTSC) dated November 7, 2025 and November 21, 2025,¹ and during our discussion with the LEA on December 10, 2025, Chiquita intends to act in a way that is most protective of the existing mitigation measures and continue to move forward with the installation of the geomembrane cover in accordance with the draft Master Schedule submitted to DTSC on November 21, 2025 and attached to this letter as **Attachment A**.²

Due to the unique and complex nature of the work needed to deploy the geomembrane cover while minimizing impacts to Chiquita's other ongoing reaction mitigation efforts and the impending rainy season, Chiquita cannot at this time commit to a further expedited and detailed schedule or to covering the entire Main Canyon. Chiquita's draft Master Schedule reflects an expeditious deployment timeline that accounts for the challenging realities, complicated logistics, and unknown variables, such as weather, that are beyond Chiquita's control and can impact the pace of such an extensive installation project.³

As the LEA is aware, under DTSC's Order and per directives from DTSC, EPA, and the LEA, Chiquita worked as expeditiously as possible to deploy the initial 15 additional acres of the geomembrane cover in Segments 1, 2, and 3 of the Landfill before the rainy season.⁴ As described in prior correspondence, during this initial deployment process, Chiquita had to take landfill gas extraction wells and dewatering pumps in the active cover deployment areas offline to complete the cover installation. To help ensure the longevity of the installed geomembrane cover, the cover must be placed on a smooth surface. This surface must also be graded for appropriate routing of stormwater. Because of ongoing settlement in the data-driven reaction area, installation of cover across this initial 15 acres included substantial subgrade preparation, requiring use of heavy equipment to complete this subgrade preparation quickly enough before the rainy season. To protect existing infrastructure from damage during this subgrade preparation phase, existing piping

¹ Chiquita expressly incorporates these letters herein.

² The draft Master Schedule is approximate and subject to change based on actual conditions at the Landfill, as further described in Chiquita's November 21, 2025 response to DTSC's comments on the draft RAW.

³ Chiquita Canyon, LLC Response to DTSC Request for Updated Cover Deployment Schedule, Nov. 7, 2025, page 2.

⁴ *Id.*

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and infrastructure was removed, to the extent feasible, requiring removal of portions of the piping to enable cover installation access.⁵

As a result of taking landfill gas extraction wells and dewatering pumps offline in the active cover deployment areas, Chiquita saw an increase in on-site odors and temperatures.⁶ This complicated Chiquita's deployment strategy. Continuing to deploy the remainder of the geomembrane cover using this same approach could negatively impact the success of the mitigation measures in place to manage the reaction and mitigate odors. These impacts to the existing mitigation measures also raise questions about the practicality of installing geomembrane cover over the entire "Main Canyon waste management area," as installing just a portion of the additional coverage has disrupted the existing mitigation measures and the progress Chiquita has made to manage the reaction.

Chiquita will not compromise on ensuring that the reaction continues to be effectively managed for the sake of accelerating the geomembrane cover deployment rate. An unreasonably aggressive and strict cover deployment schedule that also requires covering unnecessary portions of the Landfill would limit Chiquita's ability to continue to evaluate the effectiveness and feasibility of its deployment strategy and to make optimizing adjustments as needed.⁷ Such an aggressive and strict schedule could hamper effective reaction management by increasing landfill gas extraction well and dewatering pump downtime, as described in Chiquita's November 7, 2025 response to DTSC, not to mention that the LEA has not explained why covering the entire Main Canyon is necessary.⁸

To continue to deploy additional geomembrane cover as quickly, safely, and effectively as possible while maintaining Chiquita's existing mitigation measures, Chiquita has begun employing a new deployment process that enables landfill gas extraction wells and dewatering pumps in active cover deployment areas to be offline for the least amount of time possible, typically one to two days at a time.⁹ As further described in prior correspondence, this new deployment process has been successful thus far, but Chiquita requires more time to fully evaluate the feasibility of this process, to optimize this process to ensure maximum operational efficiency for the remainder of the installation project, and to determine the estimated amount of time needed to complete deployment using this new process.¹⁰ Each well, lateral, header, forcemain, electrical line, and panel located in the active cover deployment area, which is constantly changing as the active cover deployment area moves, must be managed uniquely. For example, while some pieces of the system may be relatively straightforward to take offline, others may pose particular challenges due to their apparent location and the area(s) of the Landfill they service, among other factors.¹¹ In these more

⁵ *Id.*

⁶ *Id.*

⁷ *Id.* at 3.

⁸ *Id.*

⁹ *Id.* at 2.

¹⁰ *Id.* at 2-3.

¹¹ *See id.*

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complicated situations, the equipment cannot be disconnected from the system, requiring piping to be lifted so that cover may be placed underneath while maintaining connection to the system.¹²

This is extremely tedious and delicate work to ensure that the equipment and infrastructure are not damaged. Even in relatively straightforward situations that allow for equipment to be taken offline, Chiquita must coordinate efforts and schedules with at least five different groups of people to disconnect the equipment in order to move the cover deployment process forward.¹³ As a point of reference, some of Chiquita's infrastructure in these areas are gas headers that are 24 inches in diameter. These headers require heavy machinery to lift, which cannot be driven directly on top of already-deployed liner, causing access issues.

Nevertheless, and despite this unavoidable reality, Chiquita's draft Master Schedule submitted to DTSC and the LEA on November 20, 2025, attempts to estimate completion dates of each phase of deployment, subject to actual conditions at the Landfill and a multitude of moving parts and competing projects, any of which could impact the installation of the geomembrane cover.¹⁴ As an example, Chiquita requested and received an extension of the original acreage deployment schedule to allow the main access road on the north side of the Landfill to remain open while other roads to the south were completed, as well as to maintain access for a drill rig to complete installation of certain temperature monitoring probes; this demonstrates the nature of the competing projects Chiquita must balance.

Deploying the geomembrane cover expeditiously is not a matter of maximizing the number of drill rigs and liner crews that can fit onsite to complete the work all at the same time; rather, it is a matter of working deliberately and meticulously to not disrupt the gas infrastructure and other existing mitigation measures, as having to perform repairs on the gas infrastructure and other existing mitigation measures themselves would require Chiquita to pause deployment. To maintain the integrity of the gas infrastructure and existing mitigation measures, Chiquita must deploy the geomembrane cover at a careful and diligent rate while still working as expeditiously as possible to avoid delays in the first place. Chiquita cannot commit to completing the installation of the geomembrane cover "over the entire facility where waste is disposed (Main Canyon waste management area)" by August 31, 2026 for the reasons described herein and in Chiquita's August 15, November 7, and November 21, 2025 responses. Chiquita instead estimates completion of additional cover by July 31, 2027, in accordance with the draft Master Schedule submitted to DTSC and the LEA on November 21, 2025.¹⁵

¹² *Id.*

¹³ *Id.*

¹⁴ For example, Chiquita recently drilled new temperature monitoring probes (TMPs) and installed thermocouples in each. These TMPs are in the same area in which the additional geomembrane cover has been or will be deployed. This necessitated pausing the cover deployment process until installation of the thermocouples in each TMP was complete. This is but one of several constantly competing projects that Chiquita must balance with the deployment of the geomembrane cover on a daily basis. Having an additional crew would not have helped because the installation of the thermocouples in the TMPs could not have been completed while the additional geomembrane cover was being deployed in the same area. *See also* Chiquita Canyon, LLC Response to DTSC Comments on Draft RAW, November 21, 2025, PDF page 33.

¹⁵ *Id.*

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The LEA's letter additionally requests that Chiquita “[e]mploy the necessary resources to complete geomembrane coverage” and “[c]ontinue to install the required geomembrane cover during the winter months to ensure completion within the required timeframe, as CCL has done previously.”

Since the start of the deployment of geomembrane cover, Chiquita has employed all necessary resources to work as expeditiously and safely as possible to install the geomembrane cover despite several regulatory roadblocks. As soon as DTSC ordered Chiquita on April 2, 2025 to install the geomembrane cover pursuant to DTSC's Order, Chiquita immediately began to diligently identify and source materials for the geomembrane cover and prepare a feasible construction schedule. Chiquita provided DTSC on April 22, 2025 copies of a fact sheet of the geomembrane cover material it was evaluating at that time and a case study of the geomembrane cover material's success at another landfill. Chiquita then shared its plans with DTSC to order the geomembrane cover materials once DTSC provided its written approval. Yet, such written approval did not come until June 2, 2025 due to in large part discussions between DTSC and CalRecycle relating to the color of the geomembrane cover. Given this regulatory delay, Chiquita conferred with DTSC to come up with a prioritization plan for the deployment of the geomembrane cover. Chiquita and DTSC together agreed to prioritize a 300-foot radius or approximately 15 acres of the Landfill extending from the existing 30-mil geomembrane covered area before deploying geomembrane cover over other areas of the Landfill. This plan required Chiquita to move quickly to complete the installation before the rainy season.¹⁶

From the start, and as detailed in Chiquita's previous correspondence and its monthly summary reports to DTSC, Chiquita has employed all necessary resources to deploy the geomembrane cover despite regulatory setbacks. These regulatory setbacks prevented Chiquita from moving forward with the deployment of the geomembrane cover in earnest until shortly before the start of the rainy season. Chiquita has nevertheless continued to employ all necessary resources to deploy the geomembrane cover, but this process cannot again jeopardize the Landfill's existing mitigation measures.

As described in prior correspondence, Chiquita has committed to deploying EVOH in the existing 30-mil HDPE cover area to enhance odor mitigation. Employing additional crews to deploy the geomembrane cover would not lead to a more expeditious geomembrane cover deployment rate; in fact, employing additional crews could result in occupational hazards and health and safety issues and would complicate the efficacy of the geomembrane cover deployment process and further jeopardize the other mitigation measures in place. CalRecycle's letter to the LEA, dated October 3, 2025, states, “Currently, the CCL is using only one drill rig and one liner crew; the CCL should employ the necessary resources to complete the entire waste area within the recommended timeframe.” To the extent that CalRecycle or the LEA intend to insinuate that Chiquita is not making as much progress as it can due to its use of one drill rig and one liner crew, Chiquita strongly disputes this allegation. More drill rigs and liner crews do not equate to more progress.

¹⁶ Chiquita is still dealing with the repercussions of rushing to deploy the initial 15 acres of geomembrane cover before the start of the rainy season, including delays associated with deploying the final portion of geomembrane cover over Segment 3 and bringing impacted equipment back online due to the weather. See, e.g., weekly update to the LEA, Chiquita Canyon Landfill – Geosynthetic Cover – Mitigation Measure 4.1, Nov. 14, 2025; Nov. 21, 2025; Nov. 26, 2025; Dec. 5, 2025; and Dec. 12, 2025.

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As described above, the work required to deploy the geomembrane cover is tedious and delicate. This is not an issue of sequencing the work like an assembly line; the pieces must fit together precisely, like a puzzle. Having more drill rigs or liner crews onsite would not expedite the deployment process, even if the liner crews were working on different jobs. To safely deploy the geomembrane cover without disrupting, or worse, breaking the existing gas infrastructure requires deliberate and meticulous work that additional hands would prevent.

Additionally, the work that must be done to deploy the geomembrane cover is highly specialized. Any crew hired to complete the work must be properly trained, as the gas infrastructure that must be moved or rerouted to accommodate deployment of the cover poses potential hazards and must be handled by crews who know how to do so safely. Finding and training knowledgeable crews is not simple, yet Chiquita has managed to add three crews to assist with the deployment of the cover in the past few months, and the contractor has brought on an additional supervisor to further assist with the deployment and train these crews.

Moreover, some portions of the Landfill have a significant amount of infrastructure that must be relocated before deployment of the geomembrane cover can occur in those areas. This infrastructure includes but is not limited to a thermal oxidizer, pump cleaning and repair equipment, and contractor trailers and offices. As the LEA is aware, Chiquita is actively working to relocate this infrastructure, but this relocation is not a simple or fast process, especially because the Landfill has limited space. Chiquita has nevertheless been diligently working to relocate this infrastructure to allow for the deployment of geomembrane cover in these areas of the Landfill.

During the winter months, also known as the rainy season, the Landfill experiences rain and other wet weather conditions that make it unsafe for personnel to access the site or operate the requisite equipment to install the geomembrane cover. Requiring Chiquita to continue deployment of the geomembrane cover regardless of weather conditions would unnecessarily endanger human health and safety and could constitute a violation of labor and occupational safety laws. Rain creates accessibility issues for heavy machinery, and to the extent that gas or liquids extraction equipment were offline, they would have to remain offline until the ground surface dried up enough to again allow machinery safe access to the area. This would further hamper Chiquita's ongoing mitigation efforts.

CalRecycle's letter to the LEA, dated October 3, 2025, states, "The CCL has previously demonstrated its ability to install a geomembrane liner during the winter months, and it should continue this approach."¹⁷ Chiquita's ability to make progress on that 30-mil geomembrane cover during the previous rainy season has no bearing on Chiquita's ability to make progress on the deployment of the new geomembrane cover this rainy season. The Landfill today is engaged in even more mitigation measures to manage the reaction than during the previous rainy season when the 30-mil geomembrane cover was installed. For instance, and as shown in Chiquita's State of the

¹⁷ The rate of previous cover deployment does not dictate present cover deployment possibilities. Chiquita previously installed approximately 45.9 acres of 30-mil cover over the course of about seven months, with completion in January 2025. It appears the LEA assumed Chiquita could continue working at the same rate and provided an August 31, 2026 deadline. However, every cover project is different and must take into account present day conditions and changes to the Landfill.

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Landfill Report, the 30-mil deployment was initially begun in the furthest northwest corner of the Landfill, on side slopes where minimal existing infrastructure was present. The pictures in the State of the Landfill Report document progress during early 2024, which is the rainy season presumed to be referenced by CalRecycle.

As the LEA should be aware, Landfill infrastructure has changed substantially since that time. In conjunction with and upon completion of the 30-mil cover, Chiquita deployed many large gas headers to greatly expand its ability to collect and control landfill gas. As documented in the State of the Landfill Report, Chiquita added 50 miles of piping in 2024 alone, a majority of which is now in the areas being scheduled for further geomembrane deployment. Chiquita must now work around this additional infrastructure, which will slow down its ability to install further geomembrane.

Nevertheless, when the Landfill experiences a dry period long enough to allow personnel to safely access the site and operate the requisite equipment to install the geomembrane cover during the rainy season, Chiquita has been working to complete the enhancements of the existing 30-mil cover during these discrete periods. The gas infrastructure is less likely to be negatively impacted in these areas if extended pauses are needed due to the weather. Chiquita will continue to provide weekly updates on the cover installation progress to the LEA pursuant to Milestone 4.1 of the LEA's Compliance Order, including noting delays caused by the rainy season and other weather conditions.

Chiquita has detailed its geomembrane installation progress in a variety of reports, including the aforementioned weekly updates to the LEA. Chiquita also provides monthly updates to DTSC that describe in detail Chiquita's efforts since May 2025 to commence this undertaking. Consistent with our discussion with the LEA on December 10, 2025, Chiquita intends to continue to employ all necessary resources to complete the installation of the geomembrane cover by July 31, 2027, per the draft Master Schedule and subject to actual Landfill conditions.

Further deployment of the geomembrane cover to the areas that would enhance odor mitigation is of the utmost importance to Chiquita. However, the geomembrane installation process must support the continued effective management of the reaction by allowing for the unimpeded and continued extraction of heat, gas, and liquids as maximally as possible. The LEA's requested completion date of August 31, 2026 and unilateral decision that the geomembrane cover be installed over the entire Main Canyon would severely curb the progress that Chiquita has made to manage and stabilize the reaction and possibly endanger human health and safety. As such, Chiquita cannot in good conscious agree to such an infeasible request.

If you have any questions, please do not hesitate to reach out to me at (346) 807-5547 or Kate.Logan@WasteConnections.com.

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Sincerely,

Kate Logan

Kate Logan
Senior Remediation Project Manager
Chiquita Canyon Landfill

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ATTACHMENT A

Draft Master Schedule

The Department of Toxic Substances Control's (DTSC) October 15, 2025 letter directed Chiquita Canyon, LLC (Chiquita) to submit a draft Master Schedule.¹ Chiquita provides the requested draft Master Schedule below, which is subject to change based on actual conditions at the Chiquita Canyon Landfill (the Landfill). This draft Master Schedule focuses on the scope of DTSC's Order, including the tasks scheduled for completion pursuant to the three Removal Action Workplans (RAWs) required by the Order as well as DTSC's data requests issued pursuant to section 6.11 of the Order.

Geomembrane Cover Deployment (60-mil EVOH/HDPE)

The following primary tasks are currently being executed as part of the cover deployment process; however, as deployment continues, it is possible that efficiencies will be established that may result in changes to the timing of tasks needed to complete deployment of the geomembrane.

1. Disconnect wellheads and piping
2. Relocate gas header piping
3. Prepare subgrade
4. Deploy liner
5. Construct Access Road
6. Reconnect gas header and wells
7. Install LFG boots

As previously stated in Chiquita's November 7, 2025 response to DTSC's request for an updated cover deployment schedule, which Chiquita incorporates herein, several factors will continue to impact deployment progress, including but not limited to weather conditions through the rainy season, technical challenges, and the need to coordinate with multiple contractors, personnel, and competing and concurrent projects. Until the rainy season concludes, it is difficult to accurately project how cover deployment will progress. All dates below are approximate and subject to weather conditions.

- Deployment Schedule
 - Segments 1 and 2 – Completed September 2025
 - Segment 3 (partial) – Completed November 2025
 - Segment 3 (remaining 1.7 acres) – December 12, 2025

¹ DTSC General Comment #1 (“The future submittal of the Draft RAW must include a Master Schedule of all activities planned for the landfill and a draft of the Master Schedule must be submitted to DTSC within seven (7) days for review. This Schedule shall also include timing of all responses to data requests.”). Chiquita requested an extension to submit this draft Master Schedule as part of this response to DTSC's October 15, 2025 letter.

- Install 16 acres of 60-mil EVOH geomembrane over the top of the existing 30-mil geomembrane cover, which involves disconnecting and reconnecting gas headers and wells, as needed, over the geomembrane cover – March 31, 2026
- Segments 4 through 15 – November 30, 2026
- Segments 16 through 20 – July 31, 2027 (subject to weather conditions)
- Communication and Notification Schedule for Deployment Progress
 - Provide regular updates to DTSC through:
 - Weekly technical calls (Tuesdays)
 - Written weekly updates (Fridays)
 - Bi-weekly updates regarding estimated upcoming project timelines (every other Friday)

Interim Relocation and Stabilization of Containerized Waste (Tank Farm 9)

As of November 21, 2025, Tank Farm 9 has been relocated to Cell 8B. The last primary task associated with this RAW is to obtain a grading permit from Los Angeles County Public Works (Public Works).

- Permitting Schedule
 - Submitted grading permit application – August 4, 2025
 - Received comments on grading permit application from Public Works – September 25, 2025
 - Submitted notification for Conditional Authorization of hazardous waste treatment in Tank Farm 13 to the CUPA – November 20, 2025
 - Respond to Public Works' comments on grading permit application
 - Obtain grading permit – To be determined by Public Works

Protection of Cell 8A From Intrusion of ETLF (Existing Mitigation Measures and Proposed Alternatives)

As of November 21, 2025, Chiquita has elected to consider alternatives to the requested vertical barrier in the Order. Because these alternatives have not yet been selected or finalized, Chiquita reserves the right to supplement the below schedule with additional tasks associated with the selected and finalized alternatives. The schedule below includes primary tasks associated with Chiquita's existing mitigation measures.

- Existing Mitigation Measures Schedule
 - Gas Well Drilling
 - Landfill gas vertical extraction well drilling will continue.
 - There are 15 additional wells to be drilled in the Tank Farm 7 area that were previously inaccessible. The drilling has already started, and there are 3 wells that have yet to be drilled.

- Borehole logs are submitted to the South Coast Air Quality Management District (South Coast AQMD) in a monthly report pursuant to Condition 8 of the [Stipulated Order for Abatement in Case No. 6177-4 \(“SOFA”\)](#) (see Chiquita’s Odor Mitigation website (<https://chiquitacanyon.com/odor-mitigation/>) under Odor Maintenance Logs (“Stipulated Order Condition 8 (monthly reports)”).
- Weekly well drilling updates for the drilling of landfill gas vertical extraction wells and temperature monitoring probes are submitted to South Coast AQMD pursuant to SOFA Condition 15(c) (see Chiquita’s Odor Mitigation website under Odor Maintenance Logs (“Stipulated Order Condition 15(c) (weekly well drilling updates)”).
- Rig parts that allow for deeper drilling have been installed and the rig is now capable of drilling wells up to 195 feet in depth, subject to on-site conditions.

- Sonic Drill Rig – TMPs and SVEs
 - The sonic drill rig finished drilling TMP-36 to TMP-40 on September 24, 2025. Chiquita ordered temperature sensors and remote telemetry heads for the drilled TMPs (TMP-36 to TMP-40). The vendor was delayed in shipment. Chiquita expects to receive the equipment by November 24, 2025, and once they arrive, Chiquita expects to install them by December 5, 2025, subject to weather conditions. The thermocouples had to be ordered after drilling was completed because the Local Enforcement Agency (LEA) directed Chiquita to use an equation that depends on the final installed TMP depth to ensure equal spacing among the thermocouples.
 - The mobilization of the drill rig and widening of the existing perimeter road to allow drill rig access required more time than initially anticipated to begin the installation of soil vapor extraction (SVE) wells. The installation of SVE well SW-3S/M was completed on October 23, 2025, and SW-3D on October 27, 2025.
 - Drilling of the remaining temperature probes (TMP-22, TMP-23, and TMP-33) is being conducted concurrently to expedite the projects to the extent feasible.
 - The sonic drill rig was redirected to complete the installation of TMP-23, while the road work continued for the SVE wells.
 - As TMP-23 was being completed, Chiquita prepared the west side road for the drilling of the SVE wells.
 - Over the upcoming weeks, the sonic drill rig will move between the SVE wells and TMPs to complete both projects.
 - TMP-23 was completed on October 22, 2025, and TMP-22 was completed on October 31, 2025.

- Due to the current and expected rain conditions on-site, the west side road is currently inaccessible. We anticipate drilling will resume on December 1, 2025, after the Thanksgiving holiday.
- Chiquita and the LEA held a meeting on October 17, 2025, and determined where TMP-33 should be located. This location has been staked out and the additional work required to allow the drill rig to access this location has been completed.
- Please also see the weekly well drilling updates for the drilling of landfill gas vertical extraction wells and temperature probes submitted to South Coast AQMD pursuant to SOFA Condition 15(c) (see Chiquita's Odor Mitigation website under Odor Maintenance Logs ("Stipulated Order Condition 15(c) (weekly well drilling updates)").
- See the weekly TMP reports submitted to the LEA pursuant to [the LEA's June 6, 2024 Compliance Order](#) and to the US EPA (see Chiquita's Odor Mitigation website under Reports, Permits, and Other Documents, LEA ("Weekly submittals of all temperature monitoring probe data in accordance with Milestone 1B")).
- Flares/TOx
 - The HERO thermal oxidizer (TOx) is now online, and the work to relocate the Parnel TOx has been completed. All three TOx are currently running.
 - The ongoing discussion with South Coast AQMD has resulted in Chiquita modifying the permit applications for the 3 gas destruction units to be classified as flares, with verbal agreement from South Coast AQMD staff on September 24, 2025, supporting the ongoing operation of the 3 units until Flares 4 and 5 are online. Chiquita submitted an application for a permit to construct/operate and a Title V permit modification for Flare 4 to South Coast AQMD on October 30, 2023. This flare will provide additional critical destruction capacity once installed. Under the current SOFA, Chiquita would need to take down Flare 1 once Flare 4 is permitted and operational.
 - Chiquita is working through problems with the Los Angeles County Electronic Permitting & Inspections (EPIC LA) system regarding the review and approval of grading permits for Flare 4.

Data Requests (Order Section 6.11)

As of November 21, 2025, Chiquita has provided DTSC with access to data pursuant to Order section 6.11 on the following dates. Several of these documents were previously submitted to DTSC and other regulators.

- Soil compaction results for the soil placed in Cell 8B – May 7, 2025
- Follow up summary of soil compaction results – June 3, 2025

- AutoCAD files for the January 2023 topographic map and subgrade map – June 12, 2025
- Surface and base elevations for TMP-21 through TMP-35 – July 2025
- Proposed data delivery schedule pursuant to Order section 6.11 – July 21, 2025
- Raw gas data collected for the Landfill from August 20, 2024 to August 20, 2025 – August 25, 2025
- Topography of the surface of the Landfill in AutoCAD format for August 2025, ground survey points to fix the 2025 topography and properly orient the AutoCAD data, and boring logs for TMP-01 through TMP-21 and TMP-24 through TMP-35 – September 8, 2025
- EVOH Construction Quality Assurance documents – September 25, 2025
- Spreadsheet with latitudes and longitudes for a specific list of wells – October 14, 2025
- Data Management Plan – October 21, 2025 (originally submitted to US EPA and the RMAC in July 2024)
- Raw data via SCS eTools – October 30, 2025
- Raw data via RMC – November 3, 2025