



December 22, 2025

Via E-Mail

Thanne Berg, Deputy Director
Site Mitigation and Restoration Program
Department of Toxic Substances Control
8800 Cal Center Drive
Sacramento, CA 95826
Thanne.Berg@dtsc.ca.gov

Re: Chiquita Canyon, LLC Response to DTSC Notice of Proposed Determination of Noncompliance with Imminent and Substantial Endangerment Determination and Order, In the Matter of Chiquita Canyon Landfill, Docket No. HSA-FY24/25-082

Dear Ms. Berg:

Chiquita Canyon, LLC (Chiquita) submits this response to the Department of Toxic Substances Control's (DTSC) December 12, 2025 Notice of Proposed Determination of Noncompliance with Imminent and Substantial Endangerment Determination and Order (the Notice). DTSC issued the Imminent and Substantial Endangerment Determination and Order to Chiquita on April 2, 2025 (the ISE Order).

DTSC's Notice claims that Chiquita has not complied with the ISE Order due to Chiquita's alleged failure to provide DTSC with access to the information and data identified in section 6.11 of the ISE Order. To support its assertion, DTSC cites two instances in which it requested the information and data identified in section 6.11 of the ISE Order: correspondence dated July 14, 2025, and correspondence dated October 15, 2025. DTSC then describes a series of correspondence and conversations with Chiquita concerning its request. Chiquita disputes DTSC's characterization of these communications. Chiquita has responded to each of DTSC's communications and has been awaiting further direction from DTSC.

Chiquita has made consistent good-faith efforts to communicate proactively with DTSC. Chiquita remains committed to cooperating with the department and responding in good faith to its requests. However, Chiquita is compelled to note its concern regarding DTSC's recent communications and approach, which have impeded an efficient and constructive process. The tenor of certain recent communications has been unnecessarily adversarial and punitive. Specifically, DTSC has at times imposed compressed, unrealistic, and unreasonable response deadlines; mischaracterized the substance of Chiquita's prior statements and correspondence to DTSC; and asserted that Chiquita has failed to provide requested data when, in fact, Chiquita has provided substantial data to DTSC.

The only reason Chiquita has not provided more data to DTSC is because it sought clarification regarding the scope, parameters, and format of the additional information requested to ensure further production is accurate, complete, and responsive. Chiquita has repeatedly requested such clarification, yet DTSC has not engaged with Chiquita on its requests for clarification. Chiquita has nevertheless tried to comply with all of DTSC's requests for data and information in a manner that focuses Chiquita's response on the data it perceived to be most pertinent to DTSC's requests.

This lack of clarity has created avoidable uncertainty regarding DTSC's expectations and has increased the risk of misunderstanding, duplicative submissions, and unnecessary disputes. This dynamic is frustrating and counterproductive. Chiquita cannot responsively provide information without a clear understanding of what DTSC is requesting.

I. Chiquita responded timely and appropriately to DTSC's July 14, 2025 request for a schedule.

Chiquita disputes DTSC's claims that it did not respond to DTSC's July 14, 2025 request and further disputes DTSC's characterizations of the communications. DTSC's July 14, 2025 request directed the following:

. . . DTSC is requiring Respondents to provide a schedule, in table format, with delivery dates for both the data and web access requests (i.e. SCS eTools, etc.) in items a) through n) above by July 21, 2025. Once the table is provided, DTSC requests a meeting with Respondents be scheduled within one week of receipt of the data/access delivery schedule to discuss 1) the timing of data receipt, 2) the format, and 3) the methods for which the above items are to be delivered both initially to DTSC and its representatives and on an on-going basis as updates and new information/data become available.¹

Despite the unreasonably short one-week timeframe DTSC provided to respond to its request, Chiquita timely submitted on July 21, 2025 the requested schedule, in table format, with delivery dates and/or access information for the data identified in section 6.11 of the ISE Order and in items (a) through (n) of DTSC's July 14, 2025 letter.² **See Attachment A.** The majority of DTSC's requests were vague and overbroad. Nonetheless, for most of these requests, Chiquita either attempted to identify responsive data, proposed a schedule, or asked DTSC for clarification on the scope of the request to better understand what data was being sought, as further detailed below. Additionally, in emailing the requested schedule to DTSC, Chiquita's representative stated, "Please let me know if you have any questions or would like to have a call to discuss."³ Chiquita made it clear that it would make itself available to answer questions or supplement its response, as is Chiquita's practice. However, DTSC did not provide Chiquita with the opportunity to respond to DTSC's perceived deficiencies with Chiquita's July 21, 2025 submittal. Based on DTSC's July

¹ See DTSC Imminent and Substantial Endangerment Determination and Order (Docket No. HAS-FY24/25-082), Task 4 – Provide Requested Sampling, Data, and Documentation, Jul. 14, 2025, pages 2–3.

² See Chiquita Canyon, LLC Response to July 14, 2025 DTSC Data Request, Jul. 21, 2025.

³ See Email from K. Logan, Chiquita, to P. Ruttan, DTSC, RE: CCL- ISE Order - Data Request, Jul. 21, 2025.

14, 2025 request, Chiquita understood that the department would meet with Chiquita to discuss the proposed schedule and next steps; however, DTSC never scheduled or sought such a meeting. Chiquita did not receive any acknowledgement or response from DTSC on this submittal until December 12, 2025, almost five months later, via this Notice.

II. Chiquita responded timely and appropriately to DTSC's October 15, 2025 request.

Chiquita disputes DTSC's claims that it did not respond to DTSC's October 15, 2025 request and further disputes DTSC's characterizations of the communications. Contrary to DTSC's assertions in the Notice, DTSC's October 15, 2025 letter did not request the data listed in section 6.11 of the ISE Order; rather, DTSC's letter requested, pursuant to its authority under section 6.11, "the data which the Respondent is referencing and relying upon to make assertions regarding the landfill SET event."⁴ This request was vague and unreasonably broad.

Chiquita constantly monitors various parameters and mitigation measures at the Landfill, which generates hundreds of different data streams. Depending on the scope of the discussion, Chiquita can use any combination of these data streams for evaluation of the reaction. Without further clarification of the scope of DTSC's data request, Chiquita could reasonably interpret DTSC's request to encompass every data stream generated at the Landfill, regardless of whether that data stream is relevant to the scope of DTSC's regulatory oversight and authority. DTSC seems to confirm this interpretation in other parts of its October 15, 2025 request: "To verify and validate the Reaction Committee's findings, DTSC needs to receive all of the data generated at CCL."⁵ Since Chiquita was only given seven (7) days to respond, it did not think DTSC was actually directing Chiquita to provide all of this data. Requiring this data be provided within seven days, especially if the request intended to encompass all data streams generated at the Landfill and considering DTSC's silence regarding Chiquita's past requests for clarification, was unduly burdensome if not impossible.

Given the unreasonably broad nature of this request, Chiquita emailed DTSC on October 17, 2025 asking to schedule a meeting with DTSC to better understand the scope of this request in order for Chiquita to be responsive.

Chiquita met with DTSC on October 21, 2025 to discuss DTSC's and CalRecycle's comments on Chiquita's draft Remedial Action Workplan (RAW) for the Protection of Cell 8A from Intrusion of Elevated Temperature Event and Chiquita's provision of additional data. During this meeting, DTSC stated that it could not make a more specific request for data because it was not aware of the data streams generated for the Landfill. This statement further highlights the broad and vague nature of DTSC's October 15, 2025 data requests. Chiquita had informed DTSC of the many data streams generated for the Landfill in its July 21, 2025 response to DTSC's July 14, 2025 data

⁴ See Letter from DTSC, Review of Draft Removal Action Workplan, Protect Cell 8A from Intrusion of Elevated Temperature Landfill Event, Imminent and Substantial Endangerment Determination and Order (Docket No. HAS-FY24/25-082), Task 10, Protect Cell 8A from Intrusion of Subsurface Elevated Temperature Event (Site Code 302132), Oct. 15, 2025, at 4-5.

⁵ *Id.* at 4.

Chiquita Canyon, LLC Response to Notice of Proposed Determination of Noncompliance

December 22, 2025

Page 4 of 23

requests, and Chiquita provides DTSC with copies of several submittals and updates containing multiple data streams on a regular basis. DTSC was aware of many data streams generated for the Landfill.

Later that afternoon, DTSC emailed Chiquita, directing Chiquita to provide to DTSC its draft Data Management Plan and “access (with relevant methods or directions to obtain access) to CCL’s raw data, including SCS’s eTools and RMC” within two days, by close of business October 23, 2025. DTSC also directed Chiquita to provide an updated version of the draft Data Management Plan by October 30, 2025.

Chiquita responded to DTSC the next morning, October 22, 2025, providing a copy of Chiquita’s draft Data Management Plan. Chiquita explained that this draft plan had been submitted to the U.S. Environmental Protection Agency (US EPA) on July 17, 2024, pursuant to US EPA’s Unilateral Administrative Order (UAO) issued to Chiquita on February 21, 2024 (EPA Docket No. RCRA 7003-09-2024-0001 and CERCLA 106-09-2024-05), for review and approval, but had not yet been approved by EPA. Chiquita therefore did not think the plan should be revised absent EPA’s approval.

Chiquita further explained in its response that it had understood from the October 21, 2025 meeting that Chiquita would follow up with SCS Engineers (SCS) on the viability of getting DTSC its own access to SCS eTools and RMC, and then get back to DTSC regarding access options no later than Chiquita’s and DTSC’s next regularly scheduled meeting, which was scheduled for October 28, 2025.

DTSC responded on October 24, 2025, claiming that Chiquita did not request an extension of the October 15, 2025 letter’s 7-day deadline to provide the data listed under the ISE Order and that DTSC did not grant one.

Chiquita responded to DTSC that same day, explaining that it was Chiquita’s understanding from the October 21, 2025 meeting that DTSC’s primary request was for access to Chiquita’s data in SCS eTools and RMC, that Chiquita was working with its consultant, SCS, on getting DTSC its own access to both databases, and that Chiquita had noted in its October 22, 2025 response that it would get back to DTSC regarding access options by their next regularly scheduled meeting the following Tuesday, October 28, 2025. Chiquita further explained that it was Chiquita’s understanding that during the October 21, 2025 meeting, Chiquita and DTSC agreed that providing this access would satisfy the October 15, 2025 data request at this time, and that the discussion on October 21, 2025 would serve as Chiquita’s request for an extension.

During Chiquita’s next regularly scheduled weekly meeting on October 28 2025, Chiquita informed DTSC that it was working on procuring DTSC access to SCS eTools and RMC. DTSC did not make any further comments or requests relating to its October 15, 2025 data requests during that meeting.

On behalf of Chiquita, on October 30, 2025, SCS provided DTSC-identified personnel, within DTSC and the California Department of Resources Recycling and Recovery (CalRecycle), access

Chiquita Canyon, LLC Response to Notice of Proposed Determination of Noncompliance

December 22, 2025

Page 5 of 23

to Chiquita's raw data in SCS eTools. At that time, SCS was also in the process of modifying RMC, in accordance with Condition 75 of the South Coast Air Quality Management District's (SCAQMD) Stipulated Order for Abatement in Case No. 6177-4 (SOFA). Once SCS's modifications to RMC were in place, on November 3, 2025, SCS provided DTSC and CalRecycle personnel access to Chiquita's raw data in RMC. Direct agency access to a landfill's raw data is unprecedented and provides DTSC with a unique amount of oversight over that landfill. To Chiquita's knowledge, direct agency access to raw data of this magnitude from parties who are not the regulated entity has never been arranged, nor was such arrangement easy.

SCS eTools and RMC are internal control data tools for professionals with extensive knowledge and expertise of landfills and landfill gas systems. They provide experienced operators and landfill professionals with the ability to quickly view, upload, and analyze data. Key data streams in SCS eTools include LFG data such as composition, flow rates, liquid levels, and more. Key data streams in RMC include temperature data for TMPs and flare data, both flow and temperature.

DTSC claims that it has been unable to determine "if SCS eTools queries raw data (i.e., data that is field accurate and has not been altered, interpreted, or curated, as required under section 6.11)," and that because DTSC cannot confirm that all data has been provided in a raw format, Chiquita has not complied with the ISE Order.⁶ Chiquita has offered at least twice, on October 21, 2025 and November 12, 2025, to conduct a training with DTSC on SCS eTools and RMC, which could have involved talking through each data source. However, DTSC has never asked Chiquita for this demonstration of how the data is collected in the field and transferred to SCS eTools and RMC. In fact, DTSC has never asked for any assistance with reviewing either database. Chiquita is willing to answer DTSC's questions about SCS eTools and RMC, but to date DTSC has not asked any specific questions or for assistance utilizing these tools.

III. Chiquita has been responsive to each of DTSC's numerous requests.

Chiquita has provided DTSC with data, information, and reports in response to DTSC's requests, including but not limited to the July 14, 2025 and October 15, 2025 requests. The submittals and correspondence detailed below are in addition to those provided to other DTSC personnel, outside the ISE Order context, and the numerous other responses to requests from Chiquita's federal, state, and local regulators, including from other DTSC personnel.⁷

- 4/16/2025 – Chiquita submitted to DTSC a fact sheet of the EVOH/HDPE geomembrane material and a case study of the cover material's success at another landfill.
- 4/22/2025 – Chiquita submitted to DTSC construction plans and a proposed tank farm relocation layout as part of the relocation of the relocation of Tank Farm 9. Chiquita also resubmitted to DTSC the fact sheet of the EVOH/HDPE geomembrane material and a case

⁶ DTSC, Notice of Proposed Determination of Noncompliance with Imminent and Substantial Endangerment Determination and Order, Dec. 12, 2025, at pages 4–5.

⁷ See, e.g., Chiquita Canyon, LLC Response to DTSC's November 18, 2025 Summary of Violations, Dec. 18, 2025.

Chiquita Canyon, LLC Response to Notice of Proposed Determination of Noncompliance

December 22, 2025

Page 6 of 23

study of the cover material's success at another landfill previously submitted on April 16, 2025.

- 4/29/2025 – Chiquita submitted to DTSC two site maps of the proposed area for the EVOH/HDPE geomembrane cover deployment.
- 5/2/2025 – Chiquita submitted to DTSC a Monthly Summary Report for April 2025 in accordance with section 6.3 of the ISE Order. These monthly reports detail Chiquita's actions taken the previous month, actions being undertaken during that month, and actions planned to be taken the next month.
- 5/7/2025 – Chiquita submitted to DTSC pre-construction compaction soil sample results for the soil placed in Cell 8B in furtherance of the relocation of Tank Farm 9.
- 5/9/2025 – Chiquita submitted to DTSC a draft RAW for Interim Relocation and Stabilization of Containerized Waste, including maps of leachate tanks and manifolds, the extent of the reaction area as of March 2025, tank farm grading and liner plans, geosynthetic specifications and construction quality assurance requirements, Chiquita's Leachate Management Plan, Sampling and Analysis Plan, Quality Assurance Project Plan, ETLF Operations Health and Safety Plan, and other data and data streams, in accordance with section 5.1.2(b) of the ISE Order.
- 5/13/2025 – Chiquita submitted to DTSC a Construction Quality Assurance (CQA) Report for the construction of the existing soil barrier on the interim waste slope at the Landfill, including record drawings, photo logs, and other data and data streams, pursuant to section 5.1.2(c) of the ISE Order.
- 5/16/2025 – Chiquita submitted to DTSC the draft RAW for Extension of Covered Area, including the extent of the reaction area as of April 2025, the extent of the existing geomembrane cover at that time, the Vialflex Absolute Barrier X60BCS product brochure, Chiquita's Updated Design and Installation Schedule of the Gas Collection and Control System Well Field Expansion Plan, surface collector typical details, cover specifications and CQA requirements, Chiquita's Geomembrane Cover Operations and Maintenance Plan, ETLF Operations Health and Safety Plan, Odor Mitigation Plan, and other data and data streams, in accordance with section 5.1.2(a) of the ISE Order.
- 5/20/2025 – Chiquita submitted to DTSC, in response to Chiquita's and DTSC's May 14, 2025 meeting, lab test results and moisture/density test results for Cell 8B tank farm engineered soil fill.
- 6/3/2025 – Chiquita submitted to DTSC a summary of the pre-construction compaction soil sample results provided on May 7, 2025, in response to questions received from DTSC.
- 6/11/2025 – Chiquita submitted to DTSC correspondence between Chiquita and ViaFlex (the manufacturer of the EVOH/HDPE geomembrane material) on the status of ViaFlex's production of the material.

Chiquita Canyon, LLC Response to Notice of Proposed Determination of Noncompliance

December 22, 2025

Page 7 of 23

- 6/12/2025 – Chiquita submitted to DTSC, in response to its June 11, 2025 request, AutoCAD files for a January 2023 topographic map and a subgrade map.
- 6/13/2025 – Chiquita submitted to DTSC a Monthly Summary Report for May 2025 in accordance with section 6.3 of the ISE Order.
- 7/1/2025 – Chiquita submitted to DTSC the draft RAW for Protect Cell 8A from Intrusion of Elevated Temperature Landfill Event, including the extent of the reaction as of May 2025, Chiquita's Revised Soil Reaction Break/Barrier Plan Chiquita Canyon Landfill, West Toe Drain Work Plan, Reaction Area Determinations as of September 2023 and June 2025, map of LFG well installations, map of pump installations, Chiquita's Updated Chiquita Canyon Landfill Leachate Management Plan, Revised ETLF QAPP, ETLF Operations Health and Safety Plan, Landfill Best Management Practices Mitigating Landfill Reaction Odors, and other data and data streams, in accordance with section 5.1.2(c) of the ISE Order.
- 7/21/2025 – Chiquita submitted to DTSC, in response to its July 14, 2025 request, surface and base elevations for temperature monitoring probe (TMP) 21 through TMP 35.
- 7/15/2025 – Chiquita submitted to DTSC a Monthly Summary Report for June 2025 in accordance with section 6.3 of the ISE Order.
- 7/21/2025 – Chiquita submitted to DTSC, in response to its July 14, 2025 request, a proposed schedule, in table format, with delivery dates for both the data and web access requests in DTSC's request, submitted pursuant to section 6.11 of DTSC ISE Order. Chiquita never received a response from DTSC.
- 7/22/25 – Chiquita submitted to DTSC pictures of the EVOH/HDPE geomembrane cover that had been deployed thus far.
- 7/31/25 – Chiquita submitted to DTSC TMP data, in response to its July 25, 2025 request.
- 8/8/25 – Chiquita submitted to DTSC pictures of the relocated tank farm and a screenshot from a drone flyover.
- 8/15/2025 – Chiquita submitted to DTSC a Monthly Summary Report for July 2025 in accordance with section 6.3 of the ISE Order.
- 8/25/2025 – Chiquita submitted to DTSC a courtesy copy of the weekly EVOH/HDPE geomembrane cover installation update provided to the Local Enforcement Agency (LEA) for the week ending August 15, 2025, and is continuing to provide these weekly updates to DTSC.
- 8/25/2025 – Chiquita submitted to DTSC, in response to its August 21, 2025 request, an Excel spreadsheet with all of SCS's raw gas data collected for the Landfill from August 20, 2024, through August 20, 2025. Chiquita explained that it did not include the notes column because it is populated by landfill gas technicians on a discretionary, ad hoc basis, that these notes are not reviewed for any quality control and Chiquita has no way of determining their accuracy, and that the way in which the notes column is used by various landfill gas

Chiquita Canyon, LLC Response to Notice of Proposed Determination of Noncompliance

December 22, 2025

Page 8 of 23

technicians in the field could lead to confusion or misinterpretation of the data. Chiquita further explained that to avoid confusion, and the need to conduct substantial quality control of each entry in the notes column, it left this column out.

- 9/8/2025 – Chiquita submitted to DTSC, in response to its September 4, 2025 request, 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 the drilled TMP-01 through TMP-21 and TMP-24 through TMP-35.
- 9/15/2025 – Chiquita submitted to DTSC a Monthly Summary Report for August 2025 in accordance with section 6.3 of the ISE Order.
- 9/19/2025 – Chiquita submitted to DTSC a revised draft RAW for the Interim Relocation and Stabilization of Containerized Waste, including Tank Farm 13 as-built drawings, geosynthetic specifications, a CQA report, the extent of the reaction as of August 2025, pad construction truck count and soil quantity, settlement analysis, stability analysis cross sections, secondary containment capacities, NOAA Atlas 14 point precipitation frequency depth, locations of settlement monuments, general piping arrangement, pipe crossing locations, leak detection system details, signage, permit applications, Chiquita's Leachate Management Plan, Sampling and Analysis Plan, Quality Assurance Project Plan, Heat Illness Prevention Plan, and other data and data streams, together with Chiquita's responses to DTSC's and CalRecycle's comments and requests for information.
- 9/25/2025 – Chiquita submitted to DTSC, in response to its September 23, 2025 request, EVOH/HDPE CQA documents.
- 10/3/2025 – Chiquita submitted to DTSC a revised draft RAW for Extension of Covered Area, including the August 2025 Reaction Area Determination, the approximate limits of the geosynthetic cover, the Viaflex Absolute Barrier X60BCS product brochure, information from ViaFlex regarding permeance of EVOH in geomembranes, Chiquita's Geomembrane Cover Operations and Maintenance Plan, Updated Design and Installation Schedule of the Gas Collection and Control System Well Field Expansion Plan, typical sub-geomembrane LFG surface collector, EVOH geomembrane specifications and Construction Quality Assurance requirements, typical construction details, Area D01 Construction Quality Assurance report, EVOH/HDPE geomembrane order documentation, Chiquita's ETLF Operations Health and Safety Plan, Heat Injury Prevention Plan, Odor Mitigation Plan, and other data and data streams, together with Chiquita's responses to comments and requests for information from DTSC, CalRecycle, the LEA, and US EPA.
- 10/8/2025 – Chiquita hosted DTSC's Peter Ruttan, Dan Ziarkowski, and Tim Crick onsite for a tour of the Landfill.
- 10/14/2025 – Chiquita submitted to DTSC, in response to DTSC's request dated October 12, 2025, a spreadsheet with latitude and longitude coordinates for landfill gas extraction wells listed by DTSC.
- 10/15/2025 – Chiquita submitted a Monthly Summary Report for September 2025 in accordance with section 6.3 of the ISE Order.

Chiquita Canyon, LLC Response to Notice of Proposed Determination of Noncompliance

December 22, 2025

Page 9 of 23

- 10/22/25 – Chiquita submitted to DTSC a copy of Chiquita’s draft Data Management Plan, dated July 17, 2024, and originally submitted to US EPA pursuant to the UAO.
- 10/28/2025 – Chiquita hosted DTSC’s Kent Huth and Greg Buensuceso onsite for a tour of the Landfill.
- 10/28/25 – Chiquita submitted to DTSC a request to delay the deployment of the final portion of Segment 3 of the EVOH/HDPE geomembrane cover, providing additional information regarding the status and process for deployment.
- 11/7/2025 – Chiquita submitted to DTSC, in response to DTSC’s request dated October 31, 2025, an updated comprehensive cover installation schedule.
- 11/10/2025 – Chiquita submitted to DTSC, in response to DTSC’s request dated November 6, 2025, surface elevation data for eleven (11) landfill gas extraction wells identified by DTSC.
- 11/10/2025 – Chiquita submitted to DTSC, in response to DTSC’s October 31, 2025 request, a courtesy copy of its bi-weekly estimated upcoming project timeline submitted to US EPA, and is continuing to provide these bi-weekly timelines to DTSC.
- 11/14/2025 – Chiquita submitted to DTSC a Monthly Summary Report for October 2025 in accordance with section 6.3 of the ISE Order.
- 11/21/2025 – Chiquita submitted to DTSC responses to DTSC’s and CalRecycle’s comments on the draft RAW for the Protection of Cell 8A from Intrusion of Elevated Temperature Event and requests for information.
- 11/25/2025 – Chiquita submitted to DTSC a copy of the Proposed Cell 8B Hazardous Waste Tank System Global Static and Seismic Stability Analysis, dated October 31, 2025.
- 12/9/2025 – Chiquita hosted DTSC’s Greg Buensuceso onsite for a tour of the Landfill.
- 12/15/2025 – Chiquita submitted to DTSC a Monthly Summary Report for November 2025 in accordance with section 6.3 of the ISE Order.
- 12/17/2025 – Chiquita submitted to DTSC, in response to DTSC’s request dated October 15, 2025, a Slope Stability Workplan, as described in Chiquita’s November 21, 2025 correspondence.
- 12/22/2025 – Chiquita hosted DTSC’s Greg Buensuceso onsite for a tour of the Landfill.

To the extent DTSC is suggesting that Chiquita has been unwilling to provide information, we respectfully disagree. As reflected in the extensive list of data, reports, and communications detailed above, Chiquita has consistently endeavored to provide responsive information; where Chiquita has requested clarification, such clarification has been for the sole purpose of ensuring accuracy and completeness, not delay.

IV. Chiquita is providing additional data in further response to DTSC's request.

Chiquita responded adequately and appropriately to DTSC's prior requests for data and information identified in section 6.11 of the ISE Order, as described above. Nevertheless, in response to DTSC's December 12, 2025 Notice, Chiquita has undertaken considerable effort, at great expense, in collecting, reviewing, and producing responsive data and information pertaining to work undertaken pursuant to the ISE Order or related to monitoring of the elevated temperature landfill (ETLF) event.

Chiquita has spoken with Chiquita and contractor personnel whom it believes to have knowledge relevant to DTSC's request and reviewed files that it believes contain responsive documents. As part of this response, Chiquita has collected, reviewed, and produced a substantial volume of documents and information from multiple individuals and data sources (over 25,000 files). Completing these steps in the unreasonably brief 10-day timeframe provided—particularly during the year-end holiday period when key Chiquita and contractor personnel are unavailable and operational staffing is reduced—has been particularly challenging. The compressed deadline was not commensurate with the scope of the request, including the breadth of topics covered, the number of individuals involved, the need to search multiple systems, and the time required to process and review potentially responsive materials.

Limitations to the search were necessary given the broad scope of DTSC's requests and the time allowed to respond. Most of DTSC's requests are vague and overly broad and do not specify any relevant time period. Without a defined temporal scope, the request is not reasonably tailored and imposes an undue burden on Chiquita. Unless a request identified a particular time period, Chiquita used the period of January 1, 2022 until at least December 12, 2025. Chiquita made every effort to collect and produce data and information regarding the Landfill during this time period to the maximum extent feasible given the compressed timeframe and the holidays.

Because of the brief timeframe provided by DTSC, the limited availability of some of Chiquita's contractors due to the holiday season, and significant file sizes, Chiquita's third-party contractor has been unable to provide raw FLIR data in time for this response. Chiquita is actively working with this contractor on a solution and will provide this data upon receipt, as further explained in the individual responses below. Chiquita has provided all other data and information believed to be responsive to DTSC's requests. If Chiquita becomes aware of additional data and information, Chiquita will provide these on a rolling basis upon receipt.

This data is being transmitted to DTSC, in electronic format, via TitanFile. The individuals listed on this letter will receive an email with instructions for accessing the TitanFile site and the files. Please note that the link will expire on January 2, 2026.

Chiquita sought to organize the data and information by filing it in a relevant section of the ISE Order. However, some of the data and information (such as Chiquita's SOFA Condition 8 monthly report and attached Excel spreadsheets) is responsive to multiple sections of the ISE Order. To minimize unnecessary duplication, Chiquita has not provided the same data and information in response to each potentially responsive section.

Additionally, Chiquita is providing as part of this production several reports and compilations of data that were not specifically requested by DTSC but that Chiquita believes are relevant to the ISE Order in general. This additional data and information is responsive to a broad interpretation of DTSC's data requests and provides a more comprehensive picture of Chiquita's compliance and documentation. See the TitanFile folder titled "Section 6.11 Generally." This folder includes, for example, air monitoring data, groundwater data, stormwater data, and surface water data, as well as various reports and documents related to the Landfill's operations and equipment.

a. Section 6.11(a): All raw data generated regarding temperature data at CCL, and any prepared graphs, in .txt format.

Chiquita objects to DTSC's determination that its July 21, 2025 response was noncompliant. As Chiquita stated in that response, DTSC's July 14, 2025 request for "all raw data generated regarding temperature data at CCL" was vague and overly broad. Nevertheless, in an attempt to respond to DTSC's request, Chiquita provided a proposed schedule and stated that it interpreted the request as seeking TMP data and graphs and instructed DTSC that it could access the TMP data and graphs on Chiquita's publicly available Odor Mitigation website (<https://chiquitacanyon.com/odor-mitigation/>). Chiquita also identified other types of temperature-related data in response to DTSC's other requests for temperature-related data (see section 6.11(b), (c), and (f)). Chiquita's proposed schedule, together with its offer to discuss further, demonstrated Chiquita's compliance with DTSC's July 14, 2025 request. Based on DTSC's July 14, 2025 request, Chiquita understood that the department would meet with Chiquita to discuss the proposed schedule and next steps; however, DTSC never scheduled or sought such a meeting.

As additional evidence of Chiquita's cooperation, Chiquita responded to DTSC's October 15, 2025 request by providing DTSC and CalRecycle personnel with access to raw data in SCS eTools and RMC on October 30, 2025, and November 3, 2025, respectively. While a substantial amount of raw temperature-related data is housed in SCS eTools and RMC, Chiquita has never stated that "all raw data generated regarding temperature data at CCL" is housed in those databases. As discussed above, it was Chiquita's understanding from its October 21, 2025 meeting with DTSC that the department was focused on obtaining access to SCS eTools and RMC. Chiquita satisfied that request.

In addition to the raw temperature data accessible in SCS eTools and RMC, Chiquita has attempted to comply with DTSC's December 12, 2025 Notice to the extent it can reasonably do so in light of the short timeframe and the holidays. See the TitanFile folder titled "Section 6.11(a)." This folder includes temperature data of different media and in different forms, including but not limited to TMP data, waste temperature data, temperature measurements during excavation, MET data, and other data. See also the TitanFile folder titled "Section 6.11 Generally," SCS eTools, and SCS RMC, as applicable.

b. Section 6.11(b): All raw data generated regarding down well temperatures.

Chiquita objects to DTSC's determination that its July 21, 2025 response was noncompliant. Chiquita responded that it "[did] not *believe* that it collects this data" and that it "would like to further discuss this request to better understand what data is sought."⁸ Chiquita further responded that it would provide the requested data "30 days after DTSC approval of the schedule, subject to clarification and agreement on the request's scope and confirmation that Chiquita does collect this data."⁹ Chiquita's proposed schedule, together with its request for clarification to better understand the scope of the request, demonstrated Chiquita's compliance with DTSC's July 14, 2025 request.

In response to DTSC's December 12, 2025 Notice, Chiquita is providing data received from one of its consultants, SCS, including enhanced down well monitoring data. See the TitanFile folder titled "Section 6.11(b)," as well as the TitanFile folders titled "Section 6.11 Generally," "Section 6.11(a) (temperatures)," and "Section 6.11(l) (landfill gas data, notes)," and SCS eTools and RMC, as applicable.

c. Section 6.11(c): All raw data generated regarding gas well head temperatures.

Chiquita objects to DTSC's determination that its July 21, 2025 response was noncompliant and to DTSC's mischaracterization of Chiquita's response. Chiquita did not argue in its response that it did not need to provide this data. Chiquita instead responded that it submits well head temperature data to the SCAQMD each month pursuant to SOFA Condition 8 and that these monthly reports, with well head temperature data, can be accessed on Chiquita's Odor Mitigation website. Chiquita's proposed schedule, together with its offer to discuss further, demonstrated Chiquita's compliance with DTSC's July 14, 2025 request.

As additional evidence of Chiquita's cooperation, Chiquita responded to DTSC's October 15, 2025 request by providing DTSC and CalRecycle personnel with access to raw data in SCS eTools and RMC on October 30, 2025, and November 3, 2025, respectively.

In addition to the raw landfill gas wellhead temperature data accessible in SCS eTools and RMC, as applicable, Chiquita is producing copies of the Excel spreadsheets that include wellhead temperature data and are submitted to SCAQMD with the SOFA Condition 8 monthly reports.¹⁰ See TitanFile folder titled "Section 6.11(a) (temperatures)" for copies of Chiquita's SOFA Condition 8 monthly reports and Excel spreadsheets. See also the TitanFile folders titled "Section 6.11 Generally," "Section 6.11(b) (down well temps)," and "Section 6.11(l) (landfill gas data, notes)."

⁸ Chiquita Canyon, LLC Response to July 14, 2025 DTSC Data Request, Attachment A (Proposed Data Delivery Schedule Responsive to DTSC's July 14, 2025 Data Request), page 1 (emphasis added).

⁹ *Id.*

¹⁰ See, e.g., SCS, October 2025 Monthly Report for Modified Stipulated Order for Abatement (Case No. 6177-4, Chiquita Canyon Landfill (Facility ID 119219), Castaic, California, Nov. 20, 2025, Attachment E (Well Data.xlsx).

d. Section 6.11(d): All raw data generated regarding leachate production and any characterization.

Chiquita objects to DTSC's determination that its July 21, 2025 response was noncompliant. Chiquita responded that it "submits data regarding leachate production, as well as sampling results and other updates, on a daily basis as part of Chiquita's leachate extraction "dashboards" submitted to DTSC and other agencies via the Response Group, Landfill Response Support-California, 7.0-Leachate Disposal Unit (Teams Channel)" and that "Chiquita has submitted all characterizations since May 2024 via the Teams Channel." Chiquita further responded that the referenced reports could be accessed on Chiquita's Odor Mitigation website or via the Teams Channel. Chiquita's proposed schedule, together with its offer to discuss further, demonstrated Chiquita's compliance with DTSC's July 14, 2025 request. Based on DTSC's July 14, 2025 request, Chiquita understood that the department would meet with Chiquita to discuss the proposed schedule and next steps; however, DTSC never scheduled or sought such a meeting.

As additional evidence of Chiquita's cooperation, Chiquita responded to DTSC's October 15, 2025 request by providing DTSC and CalRecycle personnel with access to raw data in SCS eTools and RMC on October 30, 2025, and November 3, 2025, respectively.

In addition to the raw leachate and characterization data accessible in SCS eTools, Chiquita is producing additional raw data and information regarding leachate extraction, treatment, and characterizations as part of this response. See the TitanFile folder titled "Section 6.11(d) (leachate production, characterization)." This folder includes the "raw data" used to populate Chiquita's leachate extraction dashboard on the Teams Channel, which is a collection of analytical reports, transfer logs, spreadsheets, manifests, flow meter readings, and tank inventory inspections, among other documents. This folder also includes a variety of reports, correspondence, and data files with leachate data, including extraction and treatment information, leachate composition data, data and information concerning leachate seeps, spills, and leaks, tank farm data, and pump data. See also TitanFile folder "Section 6.11 Generally."

e. Section 6.11(e): All raw data generated regarding landfill gas production and any characterization.

Chiquita objects to DTSC's determination that its July 21, 2025 response was noncompliant. As Chiquita stated in that response, DTSC's July 14, 2025 request for "all raw data generated regarding landfill gas production and any characterization" was vague and overly broad. Nevertheless, in an attempt to respond to DTSC's request, Chiquita provided a proposed schedule and stated that Chiquita "submit[s] landfill gas data and composition analysis to SCAQMD each month pursuant to SOFA Condition 8" and that the referenced SOFA Condition 8 reports, with data regarding landfill gas production and characterization, can be accessed on Chiquita's Odor

Chiquita Canyon, LLC Response to Notice of Proposed Determination of Noncompliance

December 22, 2025

Page 14 of 23

Mitigation website.¹¹ Chiquita's proposed schedule, together with its offer to discuss further, demonstrated Chiquita's compliance with DTSC's July 14, 2025 request.

As additional evidence of Chiquita's cooperation, Chiquita responded to DTSC's October 15, 2025 request by providing DTSC and CalRecycle personnel with access to raw data in SCS eTools and RMC on October 30, 2025, and November 3, 2025, respectively.

In addition to the raw landfill gas production and characterization data accessible in SCS eTools and RMC, as applicable, Chiquita is producing copies of the Excel spreadsheets with related data that are submitted to SCAQMD with the SOFA Condition 8 monthly reports.¹² See the TitanFile folder titled "Section 6.11(a) (temperatures)" for copies of Chiquita's SOFA Condition 8 monthly reports and Excel spreadsheets. See additional landfill gas data provided in the TitanFile folders titled "Section 6.11 Generally" and "Section 6.11(l) (landfill gas data, notes)," and Chiquita's Alerts website, <https://chiquitacanyon.com/alerts/>, for data and notifications concerning downtime of the Landfill's landfill gas collection and control equipment in accordance with SOFA Conditions 81 and 82.

f. Section 6.11(f): All raw data generated via unmanned aerial vehicles (UAVs).

Chiquita objects to DTSC's determination that its July 21, 2025 response was noncompliant. Chiquita responded that it interpreted this request as seeking the following data:

- Drone measurements of settlement submitted to the LEA, and now also DTSC, on a bi-weekly basis as part of the landfill cover inspections report pursuant to the LEA's June 6, 2024 Compliance Order;
- Forward-looking infrared (FLIR) thermal images and analysis submitted to the LEA, and now also DTSC, on a bi-monthly basis also pursuant to the LEA's June 6, 2024 Compliance Order; and
- Methane data to be submitted to SCAQMD each month pursuant to Condition 8, beginning on August 20, 2025.

Chiquita also responded that the referenced data, images, and reports submitted to the LEA could be accessed on Chiquita's Odor Mitigation website and that the methane data to be submitted to SCAQMD would be posted on the same website once available. Chiquita further responded that it was unable to provide online access to Sniffer Robotic's (Sniffer) system.¹³ Chiquita's proposed schedule, together with its offer to discuss further, demonstrated Chiquita's compliance with DTSC's July 14, 2025 request.

¹¹ Chiquita Canyon, LLC Response to July 14, 2025 DTSC Data Request, Attachment A (Proposed Data Delivery Schedule Responsive to DTSC's July 14, 2025 Data Request), page 2.

¹² See, e.g., SCS, October 2025 Monthly Report for Modified Stipulated Order for Abatement, Case No. 6177-4, Chiquita Canyon Landfill (Facility ID 119219), Castaic, California, Nov. 20, 2025.

¹³ Chiquita Canyon, LLC Response to July 14, 2025 DTSC Data Request, Attachment A (Proposed Data Delivery Schedule Responsive to DTSC's July 14, 2025 Data Request), page 2.

Chiquita Canyon, LLC Response to Notice of Proposed Determination of Noncompliance

December 22, 2025

Page 15 of 23

As additional evidence of Chiquita's cooperation, Chiquita responded to DTSC's October 15, 2025 request by providing DTSC and CalRecycle personnel with access to raw data in SCS eTools and RMC on October 30, 2025, and November 3, 2025, respectively.

In addition to the raw data accessible in SCS eTools and RMC, Chiquita provides the following as part of this production:

- Chiquita's Propeller drone aerial images, with Excel spreadsheets, demonstrating measurements of settlement; this data is incorporated into the landfill cover inspection reports and submitted to the LEA on a bi-weekly basis pursuant to the LEA's 2024 Compliance Order, copying DTSC, CalRecycle, and US EPA;
- FLIR thermal images provided by Sniffer; this data, information, and analysis was submitted to the LEA on a bi-monthly basis, also pursuant to the LEA's 2024 Compliance Order, copying DTSC, CalRecycle, and US EPA (Chiquita is actively working with this contractor on a production solution and will provide this data upon receipt);
- Sniffer's surface emissions monitoring surveys for methane; this data is incorporated into the SOFA Condition 8 monthly reports submitted to SCAQMD on a monthly basis pursuant to SOFA Condition 77.¹⁴

See the TitanFile folder titled "Section 6.11(f) (unmanned aerial vehicles)." See also the TitanFile folder titled "Section 6.11(a) (temperatures)" for copies of Chiquita's SOFA Condition 8 monthly reports and Excel spreadsheets, as well as "Section 6.11 Generally" and "Section 6.11(k) (aerial or photographic images, surveys, scans)." As previously stated, Chiquita is unable to provide online access to Sniffer Robotic's system; however, Chiquita proposes to provide this raw data to DTSC on an ongoing basis and would like to further discuss the timing and method for production with DTSC.

g. Section 6.11(g): All raw data generated regarding perimeter gas wells.

Chiquita objects to DTSC's determination that its July 21, 2025 response was noncompliant. Chiquita responded that it interpreted this request as seeking the following data:

- Methane readings at GP-13 and GP-15 submitted to the LEA each week pursuant to the June 6, 2024 Compliance Order and May 8, 2024 letter; and
- Perimeter probe data submitted to SCAQMD each quarter pursuant to Rule 1150.1.

Chiquita further responded that the probe data submitted to SCAQMD could be accessed on Chiquita's Landfill Reports website,¹⁵ and that the weekly methane readings submitted to the LEA

¹⁴ See, e.g., SCS, October 2025 Monthly Report for Modified Stipulated Order for Abatement, Case No. 6177-4, Chiquita Canyon Landfill (Facility ID 119219), Castaic, California, Nov. 20, 2025.

¹⁵ Chiquita's Landfill Reports website is accessible at <https://chiquitacanyon.com/reports/landfill-reports/>.

could be accessed on Chiquita's Odor Mitigation website.¹⁶ Chiquita's proposed schedule, together with its offer to discuss further, demonstrated Chiquita's compliance with DTSC's July 14, 2025 request.

As additional evidence of Chiquita's cooperation, Chiquita responded to DTSC's October 15, 2025 request by providing DTSC and CalRecycle personnel with access to raw data in SCS eTools and RMC on October 30, 2025, and November 3, 2025, respectively. In addition to the raw data accessible in SCS eTools and RMC, as applicable, Chiquita provides 2024 and 2025 probe data in the TitanFile folder titles "Section 6.11(g) (perimeter gas wells)." See also the additional data and information in the TitanFile folders titled "Section 6.11 Generally" and "Section 6.11(l) (landfill gas data, notes)."

h. Section 6.11(h): All raw data generated regarding landfill gas pressures.

Chiquita objects to DTSC's determination that its July 21, 2025 response was noncompliant and to DTSC's mischaracterization of Chiquita's response. Chiquita did not argue that it provided similar information to other regulators. Chiquita instead requested clarification regarding the scope of "all raw data" for DTSC's request and responded that, in an attempt to respond to the request, Chiquita interpreted DTSC's request as seeking the landfill gas and pressure data submitted to the LEA each month pursuant to the LEA's June 6, 2024 Compliance Order. Chiquita further responded that the referenced monthly report submitted to the LEA, with the landfill gas and pressure data, can be accessed on Chiquita's Odor Mitigation website.¹⁷ Chiquita's proposed schedule, together with its request for clarification of the scope of the request and its offer to discuss further, demonstrated Chiquita's compliance with DTSC's July 14, 2025 request.

As additional evidence of Chiquita's cooperation, Chiquita responded to DTSC's October 15, 2025 request by providing DTSC and CalRecycle personnel with access to raw data in SCS eTools and RMC on October 30, 2025, and November 3, 2025, respectively. In addition to the raw data accessible in SCS eTools and RMC, see TitanFile folders titled "Section 6.11 Generally," "Section 6.11(a) (temperatures)" for copies of Chiquita's SOFA Condition 8 monthly reports and Excel spreadsheets, and "Section 6.11(l) (landfill gas data, notes)" for copies of Chiquita's monthly LEA reports.

i. Section 6.11(i): All raw data and reports generated regarding slope stability.

Chiquita objects to DTSC's determination that its July 21, 2025 response was noncompliant and to DTSC's mischaracterization of Chiquita's response. Chiquita did not argue that this request was limited to data and reports prepared by Chiquita's consultant, Geo-Logic Associates (GLA). Chiquita instead stated that it interpreted this request as seeking data and reports prepared by GLA regarding slope stability and that the referenced reports could be accessed on Chiquita's Odor

¹⁶ Chiquita Canyon, LLC Response to July 14, 2025 DTSC Data Request, Attachment A (Proposed Data Delivery Schedule Responsive to DTSC's July 14, 2025 Data Request), page 3.

¹⁷ Chiquita Canyon, LLC Response to July 14, 2025 DTSC Data Request, Attachment A (Proposed Data Delivery Schedule Responsive to DTSC's July 14, 2025 Data Request), page 3.

Chiquita Canyon, LLC Response to Notice of Proposed Determination of Noncompliance

December 22, 2025

Page 17 of 23

Mitigation website.¹⁸ Chiquita's proposed schedule, together with its offer to discuss further, demonstrated Chiquita's compliance with DTSC's July 14, 2025 request.

As additional evidence of Chiquita's cooperation, Chiquita responded to DTSC's October 15, 2025 request by providing DTSC and CalRecycle personnel with access to raw data in SCS eTools and RMC on October 30, 2025, and November 3, 2025, respectively. In addition to the raw data accessible in SCS eTools and RMC, as applicable, Chiquita provides copies of slope stability reports, the underlying data, and weekly and monthly fissures and tension cracks, settlement, and geosynthetic cover logs and reports. Additionally, Chiquita provides a copy of the Global Slope Stability PowerPoint presentation given by GLA to US EPA on October 23, 2024.¹⁹ See the TitanFile folder titled "Section 6.11(i) (slope stability)."

j. Section 6.11(j): All raw data regarding survey benchmark and monuments, including process used to establish the datum.

Chiquita objects to DTSC's determination that its July 21, 2025 response was noncompliant and to DTSC's incomplete characterization of Chiquita's response. Chiquita "request[ed] clarification regarding the scope and purpose of this request and what data is being sought."²⁰ Chiquita further responded that it would provide this data to DTSC "30 days after DTSC approval of schedule, subject to clarification and agreement on the request's scope."²¹ Chiquita's proposed schedule, together with its request for clarification to better understand the scope of the request and its offer to discuss further, demonstrated Chiquita's compliance with DTSC's July 14, 2025 request.

DTSC never provided the requested clarification until this Notice. DTSC clarifies in this Notice that the department is seeking "the location and identification of all onsite and offsite monuments used by the Respondents and their consultants in all reports for CCL, inclusive of all existing, destroyed, removed, abandoned and or new monuments established during the course of operations since January 1, 2020."²² Chiquita cannot opine definitely on what onsite or offsite monuments its consultants used in their reports for Chiquita. However, Chiquita is providing to DTSC as part of this production a figure demonstrating the coordinates and elevation of the monuments installed in preparation for the relocation of Tank Farm 9. Chiquita notes that it previously provided this information to DTSC on September 19, 2025, as Appendix K to the revised RAW for Interim Relocation and Stabilization of Containerized Waste, per DTSC's request in its comments dated July 29, 2025. Chiquita is also providing an updated version of this figure, as of December 22, 2025. See the TitanFile folder titled "Section 6.11(j) (survey benchmark, monuments)."

¹⁸ Chiquita Canyon, LLC Response to July 14, 2025 DTSC Data Request, Attachment A (Proposed Data Delivery Schedule Responsive to DTSC's July 14, 2025 Data Request), page 3.

¹⁹ Chiquita notes that the presentation that DTSC referenced in the Notice was given to US EPA on October 23, 2024, not in December 2024.

²⁰ Chiquita Canyon, LLC Response to July 14, 2025 DTSC Data Request, Attachment A (Proposed Data Delivery Schedule Responsive to DTSC's July 14, 2025 Data Request), page 3.

²¹ *Id.*

²² Chiquita Canyon, LLC Response to July 14, 2025 DTSC Data Request, Attachment A (Proposed Data Delivery Schedule Responsive to DTSC's July 14, 2025 Data Request), page 8.

k. Section 6.11(k): All aerial or photographic images, surveys, and scans of the facility, fissures, tension cracks, cover tears, leachate outbreaks or pools, and storage tanks taken since January 2022.

Chiquita objects to DTSC's determination that its July 21, 2025 response was noncompliant. While Chiquita objected to this request as vague and overbroad, it nevertheless stated, in an attempt to respond to this request, that Chiquita interpreted this request as seeking the following:

- Drone measurements of settlement submitted to the LEA, and now also DTSC, on a bi-weekly basis as part of the landfill cover inspections report pursuant to the LEA's June 6, 2024 Compliance Order;
- FLIR thermal images and analysis submitted to the LEA, and now also DTSC, on a bi-monthly basis also pursuant to the LEA's June 6, 2024 Compliance Order;
- Cracks and fissures inspection logs and geosynthetic cover inspection logs with photographs submitted to the LEA each week pursuant to Milestone 2B of the June 6, 2024 Compliance Order;
- Seep and pooling inspection logs with photographs submitted to SCAQMD each week pursuant to SOFA Conditions 27(c) and 27(e); and
- Reports submitted to the Los Angeles Regional Water Quality Control Board (Water Board) pursuant to Chiquita's Waste Discharge Requirements (WDRs).²³

Chiquita further responded that the referenced reports could be accessed on Chiquita's Odor Mitigation website and/or were submitted to DTSC pursuant to the June 20, 2025 Compliance Requirements letter.²⁴ Chiquita's proposed schedule, together with its offer to discuss further, demonstrated Chiquita's compliance with DTSC's July 14, 2025 request.

As additional evidence of Chiquita's cooperation, Chiquita responded to DTSC's October 15, 2025 request by providing DTSC and CalRecycle personnel with access to raw data in SCS eTools and RMC on October 30, 2025, and November 3, 2025, respectively.

In addition to the raw data accessible in SCS eTools and RMC, as applicable, Chiquita provides the following as part of this production:

- Chiquita's Propeller drone aerial images, including full orthophotographs and "point clouds" of each moment of topographic measurement during a flight (approximately 100 million moments per flight), with Excel spreadsheets, demonstrating measurements of settlement; this data is incorporated into the landfill cover inspection reports and submitted

²³ See Chiquita Canyon, LLC Response to July 14, 2025 DTSC Data Request, Attachment A (Proposed Data Delivery Schedule Responsive to DTSC's July 14, 2025 Data Request), page 3–4.

²⁴ *Id.*

Chiquita Canyon, LLC Response to Notice of Proposed Determination of Noncompliance

December 22, 2025

Page 19 of 23

to the LEA on a bi-weekly basis pursuant to the LEA's 2024 Compliance Order, copying DTSC, CalRecycle, and US EPA;

- FLIR thermal images and raw data provided by Sniffer; this data, information, and analysis was submitted to the LEA on a bi-monthly basis, also pursuant to the LEA's 2024 Compliance Order, copying DTSC, CalRecycle, and US EPA;
- Sniffer's surface emissions monitoring surveys for methane; this data is incorporated into the SOFA Condition 8 monthly reports submitted to SCAQMD on a monthly basis pursuant to SOFA Condition 77.²⁵
- Weekly cracks and fissures inspection logs and geosynthetic cover inspection logs with photographs submitted to the LEA each week pursuant to Milestone 2B of the June 6, 2024 Compliance Order; and
- Weekly leachate seep and pooling inspection logs with photographs submitted to SCAQMD each week pursuant to SOFA Conditions 27(c) and 27(e).

See the TitanFile folder titled "Section 6.11(k) (aerial or photographic images, surveys, scans)." See also TitanFile folders titled "Section 6.11(a) (temperatures)" for copies of Chiquita's SOFA Condition 8 monthly reports and Excel spreadsheets as well as folders titled "Section 6.11 Generally," "Section 6.11(d) (leachate production, characterization)," "Section 6.11(f) (unmanned aerial vehicles)," and "Section 6.11(i) (slope stability)" for relevant data and information.

I. Section 6.11(l): All raw landfill gas data including notes.

Chiquita objects to DTSC's determination that its July 21, 2025 response was noncompliant. Chiquita provided raw landfill gas data but responded that notes related to landfill gas data are created on a discretionary, ad hoc basis, and thus, Chiquita is unable to provide this information.²⁶ While Chiquita continues to object to the appropriateness and accuracy of providing this data, Chiquita worked with SCS to provide DTSC with access to raw landfill gas data, including notes. DTSC has had access to raw landfill gas data including notes since it received access to SCS eTools on October 30, 2025. For additional landfill gas data and information, see the TitanFile folder titled "Section 6.11(l) (landfill gas data, notes)" as well as folders "Section 6.11 Generally," "Section 6.11(a) (temperatures)," "Section 6.11(b) (down well temps)," "Section 6.11(c) (gas well head temps)," and "Section 6.11(e) (landfill gas production, characterization)."

²⁵ See, e.g., SCS, October 2025 Monthly Report for Modified Stipulated Order for Abatement, Case No. 6177-4, Chiquita Canyon Landfill (Facility ID 119219), Castaic, California, Nov. 20, 2025.

²⁶ See Chiquita Canyon, LLC Response to July 14, 2025 DTSC Data Request, Attachment A (Proposed Data Delivery Schedule Responsive to DTSC's July 14, 2025 Data Request), page 4.

m. Section 6.11(m): A copy of all current Standard Operating Procedures (SOPs), including but not limited to, the SOPs for landfill gas and leachate collection and treatment.

Chiquita objects to DTSC's determination that its July 21, 2025 response was noncompliant. Chiquita responded that it previously submitted the requested information to DTSC pursuant to the following:

- Standard Operating Guidelines for leachate management: Submitted May 1, 2025;
- Leachate Management Plan: Submitted May 9, 2025 and again July 1, 2025;
- Sampling and Analysis Plan: Submitted May 9, 2025; and
- Leachate Contingency Plan: Submitted July 1, 2025.²⁷

DTSC claims in its December 12, 2025 request that it “understands that a landfill gas SOP, separate from the other plans already submitted, should exist and be available,” and directs Chiquita to provide copies of all versions of this landfill gas SOP for years from January 1, 2020 to present.”²⁸ Based on Chiquita's current belief and understanding, a landfill gas SOP specific to the Chiquita Canyon Landfill—separate from the documents listed above—does not exist. It appears that one of Chiquita's consultants, SCS, may have a generic landfill gas SOP. However, Chiquita was not involved in the development of that landfill gas SOP nor is it specific to the Chiquita Canyon Landfill. Chiquita has requested a copy of that SOP, but it does not have the authority to direct a third-party contractor to provide such a proprietary document, and as such Chiquita is unable to provide this document.

See the TitanFile folder titled “Section 6.11(m) (SOPs).” Chiquita has provided copies of all SOPs in its possession, including air monitoring SOPs, leachate SOPs, and O&M documentation for landfill control equipment. For the reasons explained in section V of this response, Chiquita will not certify that “a landfill gas SOP does not currently exist.”

n. Section 6.11(n): Continuous web access to all data stored online including TMPs, FLIR images, and gas data.

Chiquita objects to DTSC's determination that its July 21, 2025 response was noncompliant. Chiquita responded that it was unable to provide online access to Sniffer's system, and that “[i]f there is certain other data needed, please explain and Chiquita will inquire whether there is a way

²⁷ See Chiquita Canyon, LLC Response to July 14, 2025 DTSC Data Request, Attachment A (Proposed Data Delivery Schedule Responsive to DTSC's July 14, 2025 Data Request), Jul. 21, 2025, page 4. The referenced documents were submitted to DTSC as part of Chiquita's response to DTSC's April 1, 2025 Summary of Violations, Chiquita's draft RAW for the Interim Relocation and Stabilization of Containerized Waste, and draft RAW for Protect Cell 8A from Intrusion of Elevated Temperature Landfill Event on May 1, May 9, and July 1, 2025, respectively.

²⁸ DTSC, Notice of Proposed Determination of Noncompliance with Imminent and Substantial Endangerment Determination and Order, Dec. 12, 2025, at page 9.

Chiquita Canyon, LLC Response to Notice of Proposed Determination of Noncompliance

December 22, 2025

Page 21 of 23

to provide that data.”²⁹ Chiquita’s proposed schedule, together with its offers to inquire with Sniffer and discuss further with DTSC, demonstrated Chiquita’s compliance with DTSC’s July 14, 2025 request.

DTSC’s December 12, 2025 Notice directs Chiquita to provide continuous access to all TMP, FLIR images, and gas data. Chiquita provided DTSC and CalRecycle personnel with continuous access to raw landfill gas data in SCS eTools and RMC on October 30, and November 3, 2025, respectively.

Chiquita cannot provide DTSC with online access to Sniffer’s system. However, Chiquita provides the following data and information as part of this production, and Chiquita proposes to provide this raw data and information to DTSC on an ongoing basis and would like to further discuss the timing and method for production with DTSC.

In addition to the raw data accessible in SCS eTools and RMC, Chiquita provides the following as part of this production:

- FLIR thermal images provided by Sniffer; this data, information, and analysis was submitted to the LEA on a bi-monthly basis, also pursuant to the LEA’s 2024 Compliance Order, copying DTSC, CalRecycle, and US EPA (Chiquita is actively working with this contractor on a production solution and will provide this data upon receipt);
- Sniffer’s surface emissions monitoring surveys for methane; this data is incorporated into the SOFA Condition 8 monthly reports submitted to SCAQMD on a monthly basis pursuant to SOFA Condition 77.³⁰

See the TitanFile folders titled “Section 6.11(f) (unmanned aerial vehicles),” “Section 6.11(i) (slope stability),” and “Section 6.11(k) (aerial or photographic images, surveys, scans).”

Chiquita additionally directs DTSC’s attention to the various pages of Chiquita’s website which provide DTSC with continuous web access to air monitoring data, flare downtime data, and more:

- Chiquita’s Community Air Monitoring Program website: <https://chiquitacanyon.com/reports/community-air-monitoring-program/>
- Chiquita’s Community Benzene Monitoring Data website: <https://chiquitacanyon.com/reports/benzene-monitoring/>
- Chiquita’s Odor Mitigation website: <https://chiquitacanyon.com/odor-mitigation/>
- Chiquita’s Landfill Reports website: <https://chiquitacanyon.com/reports/landfill-reports/>
- Chiquita’s Downtime Alerts website: <https://chiquitacanyon.com/alerts/>

²⁹ Chiquita Canyon, LLC Response to July 14, 2025 DTSC Data Request, Attachment A (Proposed Data Delivery Schedule Responsive to DTSC’s July 14, 2025 Data Request), page 5.

³⁰ See, e.g., SCS, October 2025 Monthly Report for Modified Stipulated Order for Abatement, Case No. 6177-4, Chiquita Canyon Landfill (Facility ID 119219), Castaic, California, Nov. 20, 2025.

V. Chiquita has complied with the DTSC ISE Order's information and data production requirements.

Chiquita complied with DTSC's July 14, 2025 and October 15, 2025 data requests and remains in compliance with the ISE Order. As explained above, Chiquita has responded to DTSC's numerous requests and complied with the ISE Order's information and data production requirements.

DTSC directs Chiquita that if it asserts that SCS eTools and SCS RMC provide all required data and in raw data format, it must certify under penalty of perjury that the SCS eTools and the RMC data meet each raw data requirement of section 6.11. Chiquita has never asserted and does not assert now that SCS eTools and RMC provide all required data. Thus, no such certification is required per the language of DTSC's Notice.

DTSC further demands throughout the Notice's list of Section 6.11 Requirements that Chiquita "certify that the SCS eTools and the SCS RMC data meets the raw data requirement, or provide suitable raw data." As discussed above, Chiquita has provided substantial additional raw data with this response. Further, even in the limited circumstances where Chiquita provides no additional raw data, there is no legal basis for this demand. Nowhere in any of the relevant statutes or regulations does DTSC have the authority to require a party to submit such a certification. The one statute that DTSC cites in the Notice relating to its request for certification under penalty of perjury is Cal. Code Civ. Pro. § 2015.5, which provides the format for which certification "*may be*" provided. (Emphasis added). DTSC has not pointed to any regulatory authority to require a certification under penalty of perjury. The California Code of Civil Procedure merely provides a format for making such a sworn statement.

DTSC's December 12, 2025 Notice directs Chiquita to provide extensive data, information, and documentation compiled over time by a variety of personnel. While Chiquita has requested data, information, and documentation from its contractors, it does not have the ability to investigate the accuracy and completeness of each individual piece of data or information or certify that it is providing all of the data and information in those third parties' files.

Chiquita has been cooperative and transparent and is in compliance with the ISE Order. To move forward constructively, Chiquita respectfully requests that DTSC identify with specificity any items it believes remain outstanding; confirm the precise information sought for each item, including applicable data elements, time periods, and the requested format sought; and provide a reasonable timeframe for response that is commensurate with the scope of the request. Chiquita remains available to confer promptly to align on these issues.

Chiquita Canyon, LLC Response to Notice of Proposed Determination of Noncompliance

December 22, 2025

Page 23 of 23

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

Sincerely,

Kate Logan

Kate Logan
Senior Remediation Project Manager
Chiquita Canyon Landfill

cc: John Perkey, Chiquita Canyon
Dylan Smith, Chiquita Canyon
Tim Crick, Department of Toxic Substances Control
Peter Ruttan, Department of Toxic Substances Control
Bridget Floyd, Department of Toxic Substances Control
Diane Barclay, Department of Toxic Substances Control
Christopher Kane, Department of Toxic Substances Control
Johnathon Crook, Department of Toxic Substances Control
Lisa Winebarger, Department of Toxic Substances Control
Katherine Butler, Department of Toxic Substances Control
Craig Scholer, Department of Toxic Substances Control
David Sadwick, Department of Toxic Substances Control
Wes Mindermann, CalRecycle
Todd Thalhamer, CalRecycle
Todd Sax, California Environmental Protection Agency
Amy Miller, United States Environmental Protection Agency
Laura Friedli, United States Environmental Protection Agency

ATTACHMENT A



CHIQUITA CANYON
A Waste Connections Company

July 21, 2025

Via E-Mail

Daniel V. Ziarkowski, Branch Chief
Peter Ruttan, Project Manager
Department of Toxic Substances Control
Site Mitigation and Restoration Program
Legacy Landfills Office
8800 Cal Center Drive
Sacramento, CA 95826
dan.ziarkowski@dtsc.ca.gov
peter.ruttan@dtsc.ca.gov

Re: Chiquita Canyon, LLC Response to July 14, 2025 DTSC Data Request

Dear Mr. Ziarkowski and Mr. Ruttan:

This letter constitutes Chiquita Canyon, LLC's (Chiquita) response to the Department of Toxic Substances Control's (DTSC) July 14, 2025 request for data pursuant to section 6.11 of the Imminent and Substantial Endangerment Determination and Order issued by DTSC to Chiquita on April 2, 2025 (the Order), in which DTSC requested the following information:

Sampling, Data and Document Availability. Respondents shall permit DTSC and its authorized representatives to inspect, and review, and Respondents shall provide in electronic format, as requested, any and all copies of all sampling, testing, monitoring, or other data, including raw data, generated by Respondents or on Respondents' behalf, in any way pertaining to work undertaken pursuant to this Order, or related to monitoring the SET event and associated conditions at the Site. Such data includes, but is not limited to:

- a) All raw data generated regarding temperature data at CCL, and any prepared graphs, in .txt format;*
- b) All raw data generated regarding down well temperatures;*
- c) All raw data generated regarding gas well head temperatures;*
- d) All raw data generated regarding leachate production and any characterization;*
- e) All raw data generated regarding landfill gas production and any characterization;*
- f) All raw data generated via unmanned aerial vehicles (UAVs);*
- g) All raw data generated regarding perimeter gas wells;*
- h) All raw data generated regarding landfill gas pressures;*

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www.chiquitacanyon.com

DTSC Data Request Response

July 21, 2025

Page 2 of 4

- i) All raw data and reports generated regarding slope stability;*
- j) All raw data regarding survey benchmark and monuments, including process used to establish the datum;*
- k) All aerial or photographic images, surveys, and scans of the facility, fissures, tension cracks, cover tears, leachate outbreaks or pools, and storage tanks taken since January 2022;*
- l) All raw landfill gas data including notes;*
- m) A copy of all current Standard Operating Procedures (SOPs), including but not limited to, the SOPs for landfill gas and leachate collection and treatment;*
- n) Continuous web access to all data stored online including TMPs, FLIR images, and gas data.*

DTSC requested that Chiquita provide a schedule, in table format, with delivery dates for both the data and web access requests listed above. Chiquita provides a proposed data delivery schedule, where applicable, in **Attachment A**, subject to the following conditions and points of clarification:

1. Chiquita asserts all privileges it may have with respect to data or information potentially responsive to DTSC's July 14, 2025 data request, including the attorney-client privilege, work-product doctrine, all privileges applicable to materials generated in anticipation of litigation, and any other privilege under law. Chiquita will not produce such data or information, and Chiquita does not intend to waive any such privilege as to any data, information, or document subject to privilege that is produced, inadvertently or otherwise, in response to DTSC's July 14, 2025 data request.
2. Chiquita interprets DTSC's data requests as limited to data or information within the scope of DTSC's authority under the Order and relevant state law.
3. Chiquita's proposed data delivery schedule is based on its interpretations of DTSC's data requests as specified in **Attachment A**.
4. Where data or information has previously been provided to DTSC or another regulatory agency and is accessible on Chiquita's Odor Mitigation website, Chiquita's Landfill Response Support-California, 7.0-Leachate Disposal Unit (Teams Channel), a regulatory database, or is otherwise publicly available, Chiquita has noted as much in **Attachment A** and provided the web address or other instructions for accessing that data or information.
5. The time periods for the data that Chiquita will provide in response to this data request (including data that Chiquita has already provided to DTSC or other regulatory agencies and that is available on Chiquita's website, a regulatory database, or is otherwise publicly available, and collectively referred to as "previously provided data") are the time periods reflected by the previously provided data.

DTSC Data Request Response

July 21, 2025

Page 3 of 4

6. Regarding data request a) (“all raw data generated regarding temperature data at CCL, and any prepared graphs, in .txt format”), Chiquita objects to this request as vague and overbroad; nonetheless, Chiquita identifies responsive data in **Attachment A**.
7. Regarding data request b) (“[a]ll raw data generated regarding down well temperatures”), Chiquita notes that it does not collect this data, and asks for clarification on the scope of this request to better understand what data is being sought.
8. Regarding data request e) (“all raw data generated regarding landfill gas production and any characterization”), Chiquita objects to this request as vague and overbroad; nonetheless, Chiquita identifies responsive data in **Attachment A**.
9. Regarding data request f) (“[a]ll raw data generated via unmanned aerial vehicles (UAVs)”), as previously stated to the Local Enforcement Agency (LEA) and the California Environmental Protection Agency (CalEPA) and noted in **Attachment A**, Chiquita is unable to provide online access to third-party systems.
10. Regarding data request h) (“[a]ll raw data generated regarding landfill gas pressures”), Chiquita requests clarification regarding the scope of “all raw data” for this request. Nonetheless, Chiquita initially interprets this request to include gas and pressure data submitted to the LEA each month pursuant to the LEA’s June 6, 2024 Compliance Order. This data is available on Chiquita’s Odor Mitigation website as specified in **Attachment A**.
11. Regarding data request j) (“[a]ll raw data regarding survey benchmark and monuments, including process used to establish the datum”), Chiquita requests clarification regarding the scope and purpose of this request.
12. Regarding data request n) (“[c]ontinuous web access to all data stored online including TMPs, FLIR images, and gas data”), as previously stated to the LEA and CalEPA and noted in **Attachment A**, Chiquita is unable to provide online access to third-party systems. If there is certain other data needed, please explain and Chiquita will assess whether there is a way to provide that data.

We look forward to further discussing DTSC’s July 14, 2025 data request, including its scope and parameters. If you have any questions, please do not hesitate to contact me at (346) 807-5547 or Kate.Logan@WasteConnections.com.

DTSC Data Request Response

July 21, 2025

Page 4 of 4

Sincerely,

Kate Logan

Kate Logan
Regional Engineer
Chiquita Canyon Landfill

cc: Steve Cassulo, Chiquita Canyon
Dylan Smith, Chiquita Canyon
Sarah Phillips, Chiquita Canyon
Nicole Ward, Chiquita Canyon
Amanda Froman, Chiquita Canyon
John Perkey, Chiquita Canyon
Thanne Berg, Department of Toxic Substances Control
Tim Crick, Department of Toxic Substances Control
Diane Barclay, Department of Toxic Substances Control
Christopher Kane, Department of Toxic Substances Control
Johnathon Crook, Department of Toxic Substances Control
Lisa Winebarger, Department of Toxic Substances Control

ATTACHMENT A

DTSC ISE Order – Chiquita Canyon Landfill
Proposed Data Delivery Schedule Responsive to DTSC’s July 14, 2025 Data Request

Proposed Delivery Schedule for Data and Web Access Requests		
DTSC Request	Chiquita Response	Proposed Delivery Date (Subject to Change)
a) All raw data generated regarding temperature data at CCL, and any prepared graphs, in .txt format	Chiquita objects to this request as vague and overbroad. In an attempt to respond to this request, Chiquita responds that we interpret this request as seeking temperature monitoring probe (TMP) data and graphs. Chiquita has submitted TMP data and graphs to the Local Enforcement Agency (LEA) on a weekly basis since May 2024 pursuant to the LEA’s April 5 and May 29, 2024 letters and the June 6, 2024 Compliance Order.	The referenced weekly TMP reports, with data and graphs, can be accessed on Chiquita’s Odor Mitigation website. ¹
b) All raw data generated regarding down well temperatures	Chiquita does not believe that it collects this data. We would like to further discuss this request to better understand what data is sought.	30 days after DTSC approval of the schedule, subject to clarification and agreement on the request’s scope and confirmation that Chiquita does collect this data.
c) All raw data generated regarding gas well head temperatures	Chiquita submits well head temperature data to the South Coast Air Quality Management District (SCAQMD) each month pursuant to Condition 8 of the Stipulated Order for Abatement in Case No. 6177-4 (SOFA).	The referenced monthly SOFA Condition 8 reports, with well head temperature data, can be accessed on Chiquita’s Odor Mitigation website.
d) All raw data generated regarding leachate production and any characterization	Chiquita submits data regarding leachate production, as well as sampling results and other updates, on a daily basis as part of Chiquita’s leachate extraction “dashboards” submitted to DTSC and other agencies via the Response Group, Landfill Response Support-California, 7.0-Leachate Disposal Unit (Teams Channel). In addition, Chiquita has submitted all characterizations since May 2024 via the Teams Channel.	The referenced reports can be accessed on Chiquita’s Odor Mitigation web site or via the Teams Channel.

¹ See <https://chiquitacanyon.com/odor-mitigation/stipulated-order-for-abatement/>.

Proposed Delivery Schedule for Data and Web Access Requests		
DTSC Request	Chiquita Response	Proposed Delivery Date (Subject to Change)
	<p>In addition to the data and information submitted via the Teams Channel, Chiquita submits and posts the following data and reports to our Odor Mitigation website:</p> <ul style="list-style-type: none"> • Leachate sampling results submitted to SCAQMD each month pursuant to SOFA Condition 38; • Leachate extraction data submitted to SCAQMD each week pursuant to SOFA Condition 53; and • Quantities of leachate extracted, treated onsite, or sent offsite for disposal or treatment submitted to SCAQMD each month pursuant to SOFA Condition 8. 	
e) All raw data generated regarding landfill gas production and any characterization	Chiquita objects to this request as vague and overbroad. In an attempt to respond to this request, Chiquita responds that we submit landfill gas data and composition analysis to SCAQMD each month pursuant to SOFA Condition 8.	The referenced monthly SOFA Condition 8 reports, with data regarding landfill gas production and characterization, can be accessed on Chiquita's Odor Mitigation website.
f) All raw data generated via unmanned aerial vehicles (UAVs)	<p>Chiquita interprets this request as seeking the following data:</p> <ul style="list-style-type: none"> • Drone measurements of settlement submitted to the LEA, and now also DTSC, on a bi-weekly basis as part of the landfill cover inspections report pursuant to the LEA's June 6, 2024 Compliance Order; • Forward-looking infrared (FLIR) thermal images and analysis submitted to the LEA, and now also DTSC, on a bi-monthly basis also pursuant to the LEA's June 6, 2024 Compliance Order; and • Methane data to be submitted to SCAQMD each month pursuant to SOFA Condition 8, beginning on August 20, 2025. 	The referenced data, images, and reports submitted to the LEA can be accessed on Chiquita's Odor Mitigation website. The methane data to be submitted to SCAQMD will be posted on Chiquita's website once available. Chiquita is unable to provide online access to third-party systems.

Proposed Delivery Schedule for Data and Web Access Requests		
DTSC Request	Chiquita Response	Proposed Delivery Date (Subject to Change)
g) All raw data generated regarding perimeter gas wells	<p>Chiquita interprets this request as seeking the following data:</p> <ul style="list-style-type: none"> • Methane readings at GP-13 and GP-15 submitted to the LEA each week pursuant to the June 6, 2024 Compliance Order and May 8, 2024 letter; and • Perimeter probe data submitted to SCAQMD each quarter pursuant to Rule 1150.1. 	<ul style="list-style-type: none"> • The probe data submitted to SCAQMD can be accessed on Chiquita's website on the "Landfill Reports" page accessible at https://chiquitacanyon.com/reports/landfill-reports/#1611907502099-98584490-e995eeb6-78834291-8a9f. • The weekly methane readings submitted to the LEA can be accessed on Chiquita's Odor Mitigation website.
h) All raw data generated regarding landfill gas pressures	<p>Chiquita requests clarification regarding the scope of "all raw data" for this request. Nevertheless, in an attempt to respond to this request, Chiquita interprets this request as seeking the following data:</p> <ul style="list-style-type: none"> • Gas and pressure data submitted to the LEA each month pursuant to the June 6, 2024 Compliance Order. 	The referenced monthly report submitted to the LEA, with gas and pressure data, can be accessed on Chiquita's Odor Mitigation website.
i) All raw data and reports generated regarding slope stability	Chiquita interprets this request as seeking data and reports prepared by Chiquita's consultant, Geo-Logic Associates, regarding slope stability.	These referenced reports can be accessed on Chiquita's Odor Mitigation website.
j) All raw data regarding survey benchmark and monuments, including process used to establish the datum	Chiquita requests clarification regarding the scope and purpose of this request and what data is being sought.	30 days after DTSC approval of schedule, subject to clarification and agreement on the request's scope.
k) All aerial or photographic images, surveys, and scans of the facility, fissures, tension cracks, cover tears, leachate outbreaks or pools, and storage tanks taken since January 2022	<p>Chiquita objects to this request as vague and overbroad. In an attempt to respond to this request, Chiquita responds that we interpret this request as seeking the following:</p> <ul style="list-style-type: none"> • Drone measurements of settlement submitted to the LEA, and now also DTSC, on a bi-weekly basis as part of the landfill cover inspections report pursuant to the LEA's June 6, 2024 Compliance Order; 	The referenced reports can be accessed on Chiquita's Odor Mitigation website and/or were submitted to DTSC pursuant to the June 20, 2025 Compliance Requirements letter.

Proposed Delivery Schedule for Data and Web Access Requests		
DTSC Request	Chiquita Response	Proposed Delivery Date (Subject to Change)
	<ul style="list-style-type: none"> • Forward-looking infrared (FLIR) thermal images and analysis submitted to the LEA, and now also DTSC, on a bi-monthly basis also pursuant to the LEA's June 6, 2024 Compliance Order; • Cracks and fissures inspection logs and geosynthetic cover inspection logs with photographs submitted to the LEA each week pursuant to Milestone 2B of the June 6, 2024 Compliance Order; • Seep and pooling inspection logs with photographs submitted to SCAQMD each week pursuant to SOFA Conditions 27(c) and 27(e). • Reports submitted to the Los Angeles Regional Water Quality Control Board pursuant to Chiquita's Waste Discharge Requirements (WDRs). 	
l) All raw landfill gas data including notes	Chiquita interprets this request as duplicative of request e). As such, Chiquita interprets this request to be the same as request e).	N/A ²
m) A copy of all current Standard Operating Procedures (SOPs), including but not limited to, the SOPs for landfill gas and leachate collection and treatment	<p>Chiquita previously submitted the requested information to DTSC pursuant to the following:</p> <ul style="list-style-type: none"> • Standard Operating Guidelines for leachate management: Submitted May 1, 2025; • Leachate Management Plan: Submitted May 9, 2025 and again July 1, 2025; • Sampling and Analysis Plan: Submitted May 9, 2025; and • Leachate Contingency Plan: Submitted July 1, 2025. 	Please see the referenced submittals to DTSC for the requested information.

² Notes related to landfill gas data are created on a discretionary, ad hoc basis. As such, Chiquita is unable to provide this information.

Proposed Delivery Schedule for Data and Web Access Requests		
DTSC Request	Chiquita Response	Proposed Delivery Date (Subject to Change)
n) Continuous web access to all data stored online including TMPs, FLIR images, and gas data	N/A	N/A ³

³ Chiquita is unable to provide online access to third-party systems. If there is certain other data needed, please explain and Chiquita will inquire whether there is a way to provide that data.