

June 6, 2026  
01204123.45

Mr. Eric Morofuji  
Solid Waste Management Branch  
Engineering Support Branch  
Los Angeles County Department of Public Health (LEA)  
313 N. Figueroa St.  
Los Angeles, CA 90012

**Subject: Chiquita Canyon LLC's Response to the LEA's Comment Letter on the Final Construction Report 2024-2025 Temperature Monitoring Probe Installation at the Chiquita Canyon Landfill**

Dear Mr. Morofuji:

On February 18, 2026, Chiquita Canyon, LLC (Chiquita) submitted to the Los Angeles County Department of Public Health, Solid Waste Management program, acting as the Local Enforcement Agency (LEA), the Final Construction Report (Final Report) for the Temperature Monitoring Probe (TMP) Installation at the Chiquita Canyon Landfill (Landfill), as required by Mitigation Measure 4.4 of the LEA's Compliance Order issued on May 1, 2025.

The LEA, in collaboration with the California Department of Resources, Recycling and Recovery (CalRecycle), requested a revised Final Report to include the recently installed thermocouples for TP-22, TP-23 and TP-33, and to address the comments below.

*1. Provide a description of how the borings were drilled. Explain why CCL did not change boring techniques when they realized auger boring was unsuccessful?*

As documented in the weekly TMP reports submitted to the LEA between January 2, and April 24, 2025, pursuant to the LEA's June 6, 2024, Compliance Order and related LEA correspondence, Chiquita evaluated and attempted multiple boring techniques in an effort to advance borings through the reaction area to the full depth.

Specifically, Chiquita attempted drilling using rotary drilling, sonic drilling, and mud rotary drilling techniques. Despite these efforts, none of those drilling techniques proved capable of safely and effectively drilling through the reaction area to full boring depth, primarily due to the presence of liquids and the elevated subsurface pressure conditions within the reaction area, which interfered with drilling operations and prevented boring advancement.

In addition to the technical limitations, each drilling technique presented safety concerns due to the potential exposure of personnel and equipment to liquids, elevated temperatures, and reaction gas during drilling. These conditions made continued drilling within the reaction area impracticable, and posed unacceptable risk.

Additional details regarding the different drilling techniques, equipment, and drill rigs utilized are provided in the Construction Summary section of the Revised Final Report, dated June 6, 2026.



Based on the results of these attempts, there is no boring technology currently capable of safely reaching full depth within the reaction area under the existing site conditions.

2. *Provide a description on how the TMPs were installed. Explain how the boring was backfilled?*

The Final Report dated and submitted on February 18, 2026, included a description of how the TMPs were installed. Additional description of the installation of the TMPs is provided in the Construction Summary section of the Revised Final report, including the following explanation of how the boring was backfilled:

“Probe construction consisted of drilling to achievable depths, based on field conditions, and installing a solid, 2-inch-diameter stainless steel casing. The original design called for soil backfill to be placed to within 5 feet of the ground surface, followed by a 2-foot bentonite seal, with the remaining annular space backfilled with soil to finish grade. However, based on field observations and site conditions encountered during drilling operations, the final backfill completion varied across probe locations.

The as-built borehole backfill configurations are summarized below:

- Probes TP-25, TP-26, TP-27, TP-28, TP-32, TP-34, TP-35, and TP-36 were completed with soil backfill, a 1-foot-thick upper bentonite plug, and soil backfill to ground surface.
- Probe TP-33 was completed with soil backfill and a 1-foot-thick upper bentonite seal to ground surface.
- Probes TP-29, TP-30, TP-31, TP-37, TP-38, TP-39, and TP-40 were completed with soil backfill, a 2-foot-thick upper bentonite plug, and soil backfill to ground surface.
- Probe TP-24 was completed with soil backfill and a 5-foot-thick upper bentonite plug to ground surface.
- Probe TP-23 was completed with soil backfill and a 15-foot-thick upper bentonite plug extending to ground surface.
- Probe TP-21 was completed with soil backfill and both upper and lower 2-foot-thick bentonite plugs separated by soil backfill.
- Probe TP-22 included the placement of approximately 65 feet of bentonite grout due to elevated subsurface pressures encountered during drilling and to provide additional borehole stabilization.

The thickness and configuration of bentonite plugs were selected based on field conditions, including elevated subsurface temperatures and pressure conditions.

3. *Provide a QA/QC plan to validate if the temperature data met the plan.*

The temperature data collected at each TMP was obtained from thermocouples installed at depths requested by the LEA at the time of each TMP installation. Accordingly, the temperature monitoring

network was designed and implemented to be consistent with the milestone plan and subsequent communications with the LEA.

To validate the temperature data, a QA/QC approach was implemented, focusing on confirming that the data was collected from the appropriate TMP locations and thermocouple depths, that the data was recorded on a regular basis, and that the data was reviewed for completeness, consistency, and reasonableness. This QA/QC process includes verification that each TMP casing contains the necessary thermocouple depths, confirmation that the monitoring points correspond to the locations and depths identified in the plan, and review of the resulting temperature readings to identify potential anomalies, data gaps, equipment issues, or readings inconsistent with observed temperature trends.

As part of compliance with Mitigation Measure #1B of the June 6, 2024, LEA Compliance Order, Chiquita installed a Telemetry System to monitor of the each thermocouple depths located within each probe casing. The system uses Industrial Internet of Things Devices mounted on each probe riser to transmit data to the SCS RMC GeoScience (RMC) cloud-based platform for remote monitoring, review, and analysis. The Telemetry System supports the QA/QC process by providing continuous data collection at each thermocouple depth, automated reporting, alarm notifications by text and email, and secure cloud storage of monitoring data. Temperature data is recorded and uploaded to the cloud at 1–2 hour intervals, enabling near real-time visibility of temperature trends and system performance.

QA/QC review of temperature data includes confirming data receipt from each active TMP and thermocouple depth, verifying uploads occur at the expected frequency, assessing data completeness and continuity, and evaluating temperature trends for abrupt changes, outliers, or potential sensor or communication issues. Where data gaps, anomalous readings, or equipment-related issues are identified, the affected data are reviewed, the potential cause is evaluated, and, as appropriate, field checks, equipment maintenance, sensor verification, and/or data qualification are performed.

Through this process, the temperature data was collected from the planned TMP locations and depths, recorded and transmitted at the planned frequency, and reviewed for quality and consistency.

*4. Provide manufacturer information or model number of the TMPs used.*

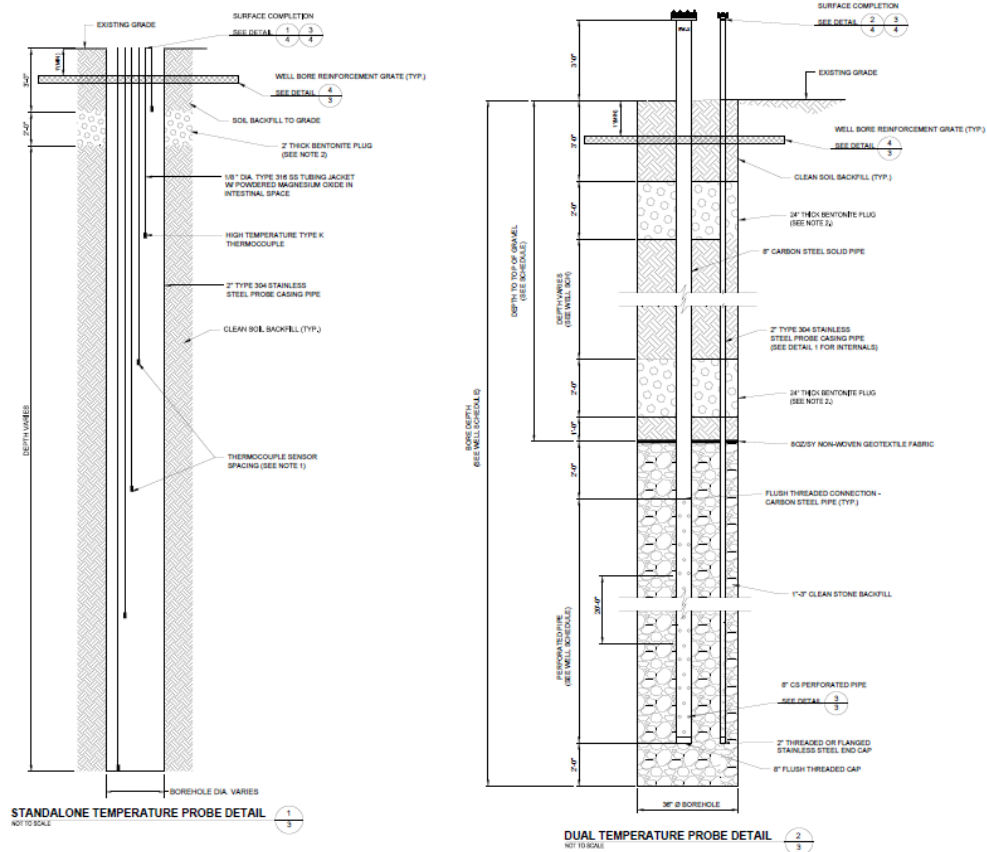
The installed thermocouples are Cleveland Electric thermocouples model MGO-K-3-4-U.

*5. Provide a summary in the report of how the telemetric system works, how the data is collected, how often, etc.*

Details regarding the telemetry system were previously submitted to the LEA on March 6, 2024, in compliance with Mitigation Measure #1B of the June 6, 2024 LEA Compliance Order. The previously submitted telemetry system details have been included in the Temperature Probe Data section of the revised Final Report.

*6. Provide construction details of the TMPs installation. Similar to the schematic below.*

Construction details for the TMP installations are included in the attached Revised Final Report, dated June 6, 2026, and a schematic is included below. This schematic was provided to the LEA in January 2024.



7. Provide information on how or if the eight probes that were installed incorrectly were corrected. CCL elected to install probes 25, 26, 27, 29, 30, 31, 32, 34 at the incorrect depth. The wrong TMP depth was shown in February 2025 and the first four TMPs were installed at 25, 40, 50, and 70ft and not at the required 15, 30, 45, 60 ft.

TP-34	25 ft	40 ft	50 ft	70 ft	85 ft	100 ft	120 ft	130 ft
2/5/2025 23:04	130.1							
2/6/2025 15:04	131.36							

In April of 2025, TMP-35 was installed to the correct depth. In May of 2025, the eight TMPs were shown to be at the correct installation depth with no explanation in the Excel spreadsheet. Provide as-builts for all TMPs, showing the actual depths. Provide evidence that this was either corrected or updated in the spreadsheet.

TP-34	15 ft	30 ft	45 ft	60 ft	75 ft	90 ft	110 ft	120 ft
4/28/2025 17:07	124.34							

TMPs TP-25, TP-26, TP-27, TP-29, TP-30, TP-31, TP-32, and TP-34 were installed at the intended depths; however, incorrect thermocouple lengths were programmed in the remote monitoring control system. Each TMP was equipped with thermocouples at the relevant intervals, but the data was initially reported at incorrect depths. The reported depths were corrected in May 2025, as documented in the weekly TMP updates submitted to the LEA during that period. As is outlined in the Modifications of the Well Boring Depths section of the revised Final Report.

In February 2025, thermocouples in TMPs TP-25, TP-26, TP-27, TP-29, TP-30, TP-31, TP-32, and TP-34 were displaying incorrect depths of 25, 40, 50, and 70 feet. Since that time, the final installation depths for these thermocouples have been verified and updated in the monitoring system, as summarized below.

- TMPs TP-25, TP-26, TP-27, and TP-34 have thermocouples installed at depths of 15, 30, 45, and 60 feet.
- TMPs TP-30 and TP-32 have thermocouples installed at depths of 15, 30, 45, and 70 feet.
- TMPs TP-29, and TP-31 have thermocouples installed at depths of 15, 30, 45, and 80 feet.
- The 60-foot, 70-foot and 80-foot thermocouples were installed in lieu of the 75-foot interval.

At the request of the LEA, the Excel spreadsheet submitted as part of the weekly TMP updates is made up of raw data and thus does not include explanatory language. As-built map for all TMPs are attached as stipulated in the LEA's letter dated May 8, 2024, Items 2 and 3, and in the LEA's June 6, 2024, Compliance Order. The actual depths are included in the weekly raw data spreadsheets and submitted to the LEA as part of the TMP updates.

If you have any questions, please do not hesitate to contact the undersigned, Srividhya Viswanathan, PE at (858) 524-9525 and Rachelle Huber (925) 789-5710.

Sincerely,



Rachelle Huber  
Project Manager  
SCS ENGINEERS



Srividhya Viswanathan, P.E.  
Senior Vice President  
SCS ENGINEERS

cc:

Kevin Green, Chiquita Canyon Landfill  
William Haley, Chiquita Canyon Landfill  
Dylan Smith, Waste Connections

Mr. Eric Morofuji

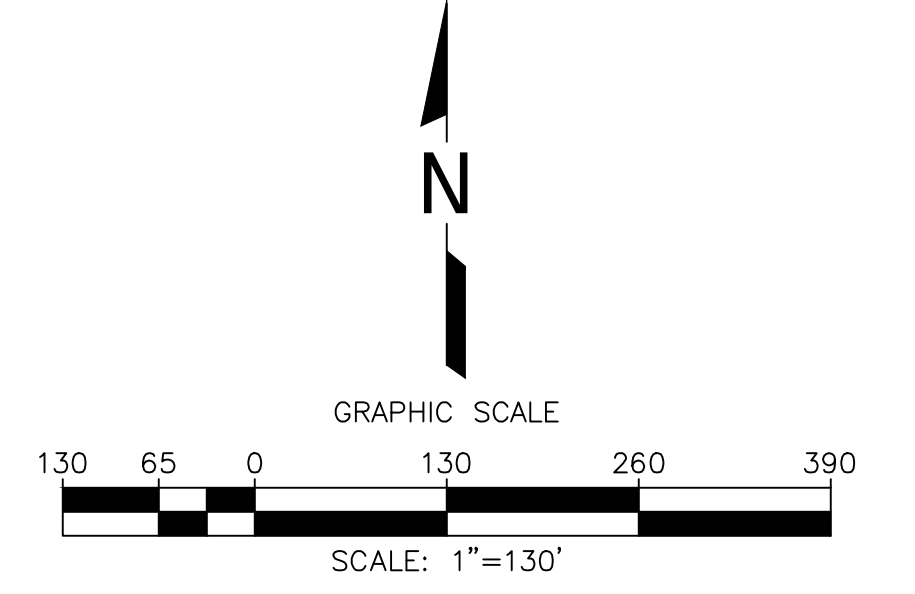
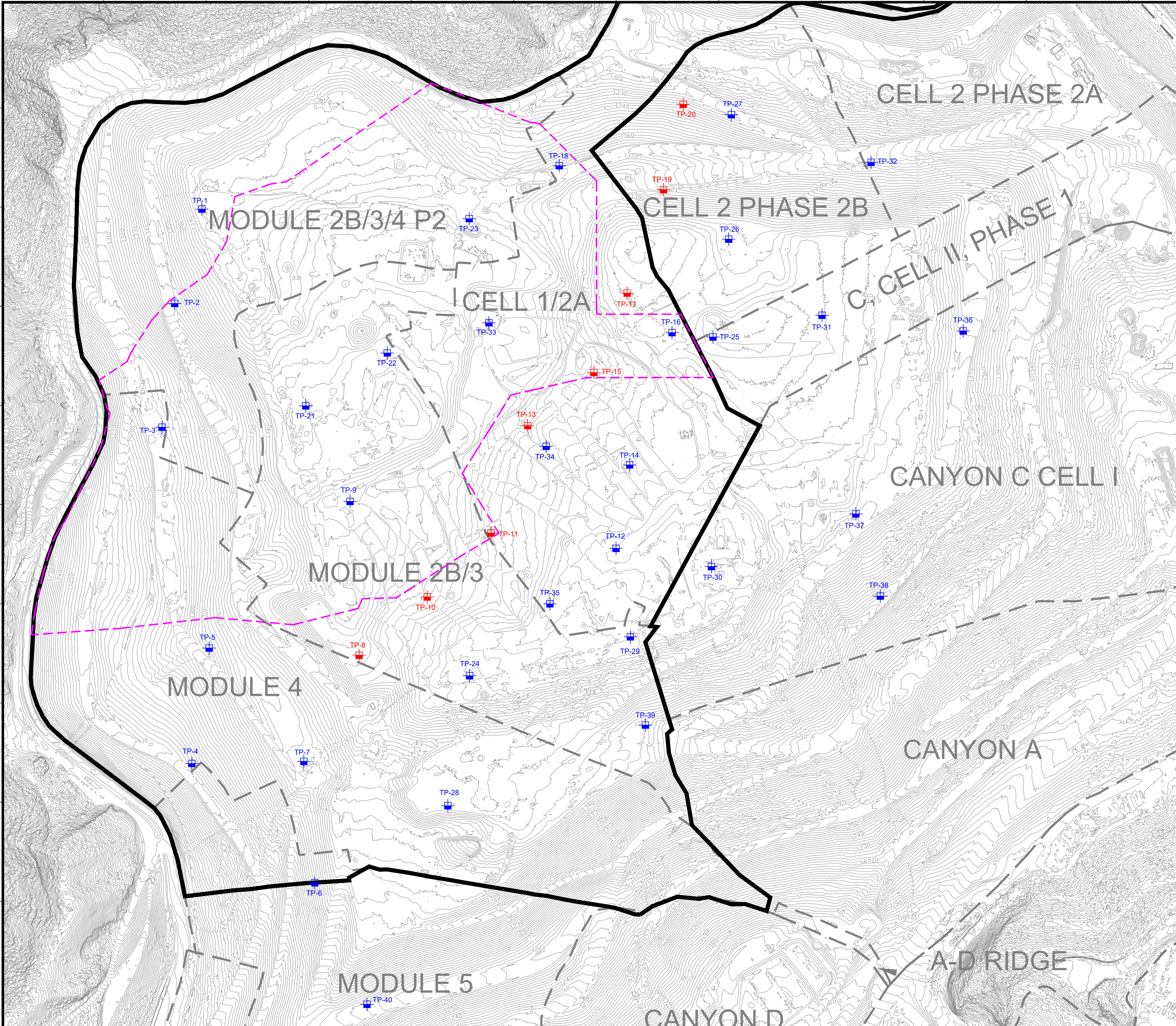
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Sarah Phillips, Waste Connections  
Matthew Breuer, Waste Connections  
Robert Ragland, Los Angeles County Department of Public Health  
Liza Frias, Los Angeles County Department of Public Health  
Azar Kattan, J.D., M.P.H, Los Angeles County Department of Public Health  
Lusi Mkhitarian, LEA  
Karen Gork, LEA  
Beverly Tway, LEA  
Renee Jensen, LEA Counsel  
Blaine McPhillips, Senior Deputy County Counsel  
Emiko Thompson, Los Angeles County Public Works  
Alex Garcia, Los Angeles County Department of Regional Planning  
Ai-Viet Huynh, Los Angeles County Department of Regional Planning  
Wes Mindermann, CalRecycle  
Todd Thalhamer, CalRecycle  
Rachel Beck, CalRecycle  
Janelle Heinzler, CalRecycle  
Jeff Lindberg, California Air Resources Board  
Jack Cheng, South Coast Air Quality Management District  
Larry Israel, South Coast Air Quality Management District  
Enrique Casas, Los Angeles Regional Water Quality Control Board  
Amy Miller, United States Environmental Protection Agency  
Joel Jones, Department of Toxic Substances Control  
Gregory Shaffer, Department of Toxic Substances Control  
Gregory Gentile, Department of Toxic Substances Control  
Natasha Dipietro, Department of Toxic Substances Control

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**LEGEND**

	EXISTING TOPOGRAPHIC CONTOUR
	EXISTING CELL LIMITS (APPROXIMATE)
	INSTALLED TEMPERATURE PROBES - STANDALONE
	INSTALLED TEMPERATURE PROBES - INSTALLED WITHIN WELL CASING
	REACTION AREA BOUNDARY (APPROXIMATE) - BASED ON DATA REVIEW
	REACTION AREA BOUNDARY - CONDITION 9A

NO.	REVISION	DATE

SHEET TITLE: EXISTING TEMPERATURE PROBE MAP  
 PROJECT TITLE: CHIQUITA CANYON LANDFILL  
 CASTAIC, CALIFORNIA



DATE: 02/18/2026  
 SCALE: AS SHOWN  
 SHEET: 1

- GENERAL DRAWING NOTES:**
- EXISTING TOPOGRAPHIC SURVEY INFORMATION SHOWN WAS PROVIDED BY PROPELLER. AERIAL PHOTOGRAPHY DATED FEBRUARY 10, 2026.
  - NORTH ARROW SHOWN HERE IS REFERENCE TO THE CALIFORNIA STATE PLANE ZONE V COORDINATE SYSTEM, NAD 83.