CHIQUITA CANYON
A Waste Connections Company

August 14, 2026

Via E-Mail
Tyler Holybee, Project Coordinator
Enforcement and Compliance and Assurance Division (ENF-2-2)
U.S. Environmental Protection Agency, Region IX
75 Hawthorne Street
San Francisco, California 94105
Holybee.Tyler@epa.gov

Laura Friedli, Attorney-Advisor
U.S. Environmental Protection Agency, Region IX
75 Hawthorne Street
San Francisco, California 94105
Friedli.Laura@epa.gov

Re: Chiquita Canyon, LLC – Response to EPA's Further Comments on the West Toe Buttress Work Plan, Docket No. RCRA 7003-09-2024-0001 and CERCLA 106-09-2024-05

Ms. Friedli and Mr. Holybee:

Chiquita Canyon, LLC ("CCL") writes in response to the United States Environmental Protection Agency's ("EPA") July 15 and July 22, 2026 emails as well as Los Angeles County Public Works' ("PW") June 29, 2026 letter containing comments on the West Toe Buttress Work Plan (revised May 27, 2026). CCL also attaches to this response a further revised West Toe Buttress Work Plan (the "Third Revised West Toe Buttress Work Plan") responsive to EPA's August 10, 2026 Notice of Partial Acceptance.

A majority of EPA and PW's comments concern refinements to the engineering design and associated technical analyses provided in the appendices to the work plan. CCL has reviewed those comments and has incorporated the changes in the appendices to the Third Revised West Toe Buttress Work Plan, where appropriate. CCL sets forth the below responses to provide additional context.

I. Responses to EPA's July 22, 2026 Correspondence.

1. **We are concerned about the cross section 18+00 to 19+00 (GP-14) and the stability of the area where the retaining wall will be located. Specifically:**

    a. *We note the slope exceeds 2:1 (H:V). CCL should provide a dynamic analysis to determine the Factor of Safety.*

CCL assumes that EPA's comment refers to the Mechanically Stabilized Earth ("MSE") wall shown in the cross sections. The static and seismic (dynamic) analysis of the MSE retaining wall between Stations 18+00 and 19+00 was evaluated as documented in the May 1, 2026 Technical Memorandum (Appendix C).

    b. *CCL should include a cross-section through GP-14 and run the model in this location.*

The design level stability analyses will include a cross-section through the MSE wall at Station 18+50. These design-level analyses are in progress and will be provided to EPA as soon as possible.

    c. *The analysis should justify the assumptions about the interface between the geofabric and the soil (e.g. what assumptions were used about the ability of the geofabric to resist sliding of the soil).*

The West Toe Buttress Stability Evaluation (Appendix D) was a preliminary evaluation of the feasibility and potential effectiveness of the soil buttress and MSE wall. It was based on the information available at the time and was preliminary in nature. The analysis methods and material properties used for analysis will be documented and justified in the design-level stability analysis report. This report is in progress and will be provided to EPA as soon as possible.

    d. *The analysis should account for infiltration from stormwater, regular leachate, and reaction leachate, particularly given potential drainage features in that area.*

The West Toe Buttress Stability Evaluation (Appendix D) accounted for all fluid pressures that potentially could affect stability. The design-level analysis report will also account for fluid pressures that could affect stability. This design-level report is in progress and will be provided to EPA as soon as possible. Please note that there is no meaningful distinction between "regular leachate" and "reaction leachate" with respect to stability.

    e. *Additionally, the analysis should take into account potential impacts of the leachate on the geofabric and its interface with the soil. To support this analysis, EPA would like to see a letter/description from the manufacturer of the geofabric regarding the resiliency of the geofabric when exposed to leachate.*

The West Toe Buttress Stability Evaluation (Appendix D) accounts for leachate and landfill gas pressure conditions and potential temperature effects on liner shear strength. Such considerations are standard in cross-section analyses across landfills. No letter or description from the geofabric manufacturer regarding the resiliency of the material when exposed to leachate is available, but identical geofabric is standard to the landfill industry worldwide.

2. **CCL should also justify the setbacks to the property line at cross section 18+00 to 19+00 and address the potential for slope failure onto the adjacent property.**

The setback shown in Appendix F (see Sheets C305–C306 and C401-C402) is dictated by two constraining factors. First, CCL must maintain access to existing gas probe, GP-14. This probe is part of the Landfill's environmental monitoring system required by the facility's Solid Waste Facilities Permit, Waste Discharge Requirements, and South Coast Air Quality Management District Rule 1150.1. Second, the setback is constrained by the geometry of the lower buttress. CCL evaluated various alternatives, but only the selected configuration provided access to GP-14 and the required size for the lower buttress.

3. **We are concerned about the cross section 11+00. Fill 3' or more atop slopes equal to or exceeding 5:1 (H:V) must be properly benched and keyed.**

The keying and benching requirements into existing slopes had previously been discussed with the Construction Manager and are included in the revised design set (see Appendix F, all cross-sections showing fill on existing slopes greater than 5:1).

4. **Updates are required to the slope stability model (Appendix D) per DPW's geotechnical comments. Critically:**

    a. *The DPW Comment Memo pointed out the stability analysis doesn't include a slope stability model and corresponding outputs. CCL should supplement the analysis with this.*

This information will be included in the design-level analysis report. This design-level report is in progress and will be provided to EPA as soon as possible.

    b. *The DPW Comment Memo says the factors of safety for the proposed buttress are below County minimum standards. CCL should provide the justification for the factor of safety.*

This information will be included in the design-level analysis report. This design-level report is in progress and will be provided to EPA as soon as possible.

5. **The "final" version of the earthwork calculations (Appendix E) should be stamped by an engineer.**

The final earthwork calculations have been stamped by an engineer and provided in Appendix F, Sheets C100 and C200.

6. **Our expectations are that all sheets of the designs are stamped by the civil engineer. Additionally, any plans or analyses of geotechnical features or geotechnical calculations should also be stamped by the geotechnical engineer. The retaining wall is a geotechnical feature and plans for the retaining wall should bear the stamp of the geotechnical engineer.**

All sheets of the final design set have been stamped by the civil engineer (see Appendix F).

> **Unnumbered Comment (A). Additionally, we understand from our conversation that CCL will further evaluate whether it can articulate a threshold or other conditions under which it will consider providing for overnight refuge or hotel vouchers. Please keep us updated on your evaluation.**

CCL has updated the Third Revised West Toe Buttress Work Plan to clarify that additional community mitigation measures, including temporary relocation, will be implemented as warranted based on the nature and severity of resulting impacts (see "Community Notifications and Mitigation" section). Current monitoring data indicate that conditions at the West Toe remain stable, and CCL will continue to monitor site conditions and evaluate temporary relocation on a case-by-case basis in coordination with appropriate public health and emergency response agencies. The Community Exposure Mitigation Plan, most recently revised and submitted to the County Department of Public Health on August 7, 2026, provides additional criteria for that evaluation.

> **Unnumbered Comment (B). Finally, if you could please provide us with the best up-to-date instructions for community members to sign up for alerts and information / flyers about transportation (if there's anything additional to or superseding what's on the website https://chiquitacanyon.com/cool-zone-shuttle-service/), that would be appreciated.**

CCL has updated the Third Revised West Toe Buttress Work Plan with the most current information regarding how community members can sign up to receive alerts and information regarding the "cool zone" and the West Toe Buttress Project generally (see "Community Notifications and Mitigation" section).

II. Responses to EPA's July 15, 2026 Correspondence

1. **Submit the following information for each portion of the Project. Consider adding this information directly to the design drawings (e.g., CS100; CS107; CS108).**

Earthwork Volumes Cut_____(cy), Fill_____ (cy) *
Over Excavation/ Alluvial Removal & Compaction _____ (cy) *
Export _____(cy), Export Location: _____ *
Total Disturbed Area _____ (Acres) *
Total Proposed Irrigated Landscape Area _____ Square Feet *
• Pre-Development (Existing) Impervious area _____ (SF) *
Post-Development (Proposed) Impervious area _____ (SF) *

The requested information has been added to Appendix F (see the "General Information" section on Sheet C000).

2. **CCL must implement and adhere to the substantive requirements and standards during the West Toe Buttress Project in the following documents:**

    a. *Cover Sheet, available at: https://pwgis.blob.core.windows.net/cad/standards/Grading%20and%20BMP%20General%20Notes%20%283-28-17%29.pdf, including the Best Management Practices detailed in the "Best Management Practice Notes".*
        i. *Accordingly, CCL must implement the 2017 County of Los Angeles Building Codes and State Model Water Efficiency Landscape Ordinance for all grading and construction activities associated with the West Toe Buttress project. Without limitation, the work must conform to the compaction criteria under "Fill Notes" Item 37, including 93% of maximum dry density deeper than 40 feet below finish grade.*

The requested information has been added to Appendix F, as applicable (see the "General Notes" section on Sheet C001).

    b. *"Best Management Practices for Construction Activities," available at: https://dpw.lacounty.gov/bsd/lib/fp/Building/Handouts/General%20Documents/Attachment%20A%20BMP%20Notes.pdf for the project.*

The requested information has been added to Appendix F (see the "General Notes" section on Sheet C001).

    c. *"Erosion and Sediment Control Plan General Notes" available at: https://dpw.lacounty.gov/bsd/lib/fp/Drainage%20and%20Grading/Erosion%20Control/ESCP%20Notes%20(3-28-17).pdf.*
    Note: Substantive requirements and standards in the Cover Sheet do not include the requirements in the foregoing documents to: attach the sheets to the designs and provide the signatures or certifications on the sheets; make submissions to, notify, or obtain approvals or permits from DPW or the Building Official; and arrange for inspections and provide inspection reports to the County grading inspector(s), the Building Official, or DPW. However, DPW and EPA retain and do not waive all their inspection authorities and may request an inspection accordingly. CCL does not need to prepare a separate stormwater management or erosion and sediment control plan for the West Toe Buttress Project; however, CCL should review the Second Revised Work Plan and SWPPP, and incorporate the requirements, as appropriate, or otherwise confirm CCL will adhere to the requirements and standards.

The requested information has been added to Appendix F, as applicable (see the "General Notes" section on Sheet C001).

3. **Provide the earthwork calculations reflected in the "Notes" on the Lower Buttress and Backcut Plan, Drawing CS100, in the "Notes" on the Upper Buttress Plan, Drawing CS108, in Appendix F, stamped and signed by a civil engineer.**

The earthwork calculations have been added to Appendix F (see Sheets C100 and C200).

4. **The grading activities may occur in a high fire zone; therefore, CCL shall ensure that the Los Angeles County Fire Department is notified of the grading work.**

CCL acknowledges this comment and has notified the Los Angeles County Fire Department of the grading work.

5. **Approval of the Second Revised Work Plan, as amended, does not reflect any position by EPA regarding the status of any title issues relating to the land on which the improvements may be constructed. CCL is responsible for ensuring it is not encroaching on property not owned by CCL, including ensuring the appropriate property line surveys are conducted by a licensed land surveyor or civil engineer.**

CCL acknowledges this comment and will ensure it does not encroach on property not owned by CCL.

6. **Regarding the Lower Buttress and Backcut Plan, Drawing CS100, in Appendix F, for the features at Grids F3/F2:**

    a. *Define the drainage pattern at grade;*

CCL has included the requested revision on Sheets C100, C101-C106, and C200-C205 of Appendix F.

    b. *Show any (E) to-be-reused drainage devices, (N) devices, and their tie in point(s);*

Existing drainage devices are found in three locations. Two are found in existing channels at the north end of the buttress, and the third is found in the remaining portion of the existing main drainage channel (see Appendix F, Sheet C100).

    c. *Demonstrate how flows are conveyed through the site and where they outlet; and*

CCL has included the flows and outlets on the revised drawing set (see Appendix F, Sheet C100).

    d. *Include specifications, dimensions, and details to convey the full drainage design.*

CCL has included the specifications, dimensions, and details for the full drainage design in the revised drawing set (see Appendix F, Sheet C100).

7. **Regarding the Lower Buttress and Backcut Plan, Drawing CS100, in Appendix F, for the features at Grids F3/F2, we note that infiltration may cause a reduction in the Factor of Safety (FoS). CCL should supplement the portion of the Second Revised Work Plan detailing the planned stormwater conveyances with a dynamic analysis to determine the FoS.**

CCL has included the subdrain in the lower buttress in the revised drawing set (see Appendix F, Sheet C100, Keynote 9).

8. **Each page of the engineering designs in Appendix F requires a signature and stamp of a professional engineer, and geotechnical recommendations must be certified by a geotechnical engineer in accordance with state and local requirements.**

Each page of Appendix F has been signed and stamped by a professional engineer. The geotechnical recommendations will be certified by a geotechnical engineer in accordance with state and local requirements and will be included in the design-level analysis report. This design-level report is in progress and will be provided to EPA as soon as possible.

9. **Regarding the Lower Buttress and Backcut Plan, Drawing CS104, in Appendix F:**

    a. *For the feature at the Grids E/D 4/5, the slope exceeds 2:1 (H:V). Again, CCL should supplement the design with a dynamic analysis to determine the FoS.*

Please refer to CCL's response in Section I.1.a, above.

    b. *For the feature at the Grids E/D 4/5, CCL should justify the setbacks to PL per the Los Angeles County Building Code (2023) J108.1-J108.4.*

Please refer to CCL's response in Section I.2, above.

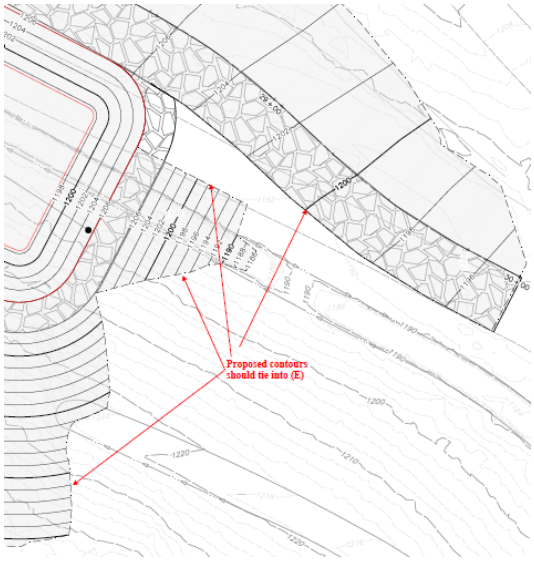
    c. *Identify the major contour information for the portion of the features at Grids G/F 3/2.*

CCL has included this information in the updated drawing set (see Appendix F, Sheet C104).

10. **Regarding the South Basin Plan, Drawing CS107, in Appendix F:**

    a. *Provide the hydrology to justify the sizing of all drainage devices to meet the 50 year storm standard (see https://pw.lacounty.gov/wmd/dsp_LowImpactDevelopment.cfm).*

    b. *The proposed contours at Grids D3 and C3/4 should tie into (E), as shown below:*



The South Basin is no longer part of this project and so Sheet C107 has been removed from Appendix F.

11. For Drawing CS300 in Appendix F (Buttress Cross Sections STA. 1+00 TO ST A. 3+50), for Buttress STA 1+50, justify why there are multiple proposed contours. If the project is to be phased, annotate on sections and plan accordingly.

The updated drawing set shows final grading in these areas without multiple proposed contours (see Appendix F, Sheet C300).

12. For Drawing CS303 in Appendix F (Buttress Cross Sections STA. 10+00 TO ST A. 12+50), for Buttress STA 11+00, fill 3' or more atop slopes equal to or exceeding 5:1 (H:V) must be properly benched and keyed. Show locations of benching and keying to scale on all sections and plan.

Please refer to CCL's response in Section I.3, above.

13. For Drawing CS305 in Appendix F (Buttress Cross Sections STA. 16+00 TO ST A. 28+50), for Buttress STA 18+00:

a. Justify the setbacks to PL per the Los Angeles County Building Code (2023) J108.1-J108.4.

Please refer to CCL's response in Section I.2, above.

b. For the feature at the Grids E/D 4/5, the slope exceeds 2:1 (H:V). Again, CCL should supplement the design with a dynamic analysis to determine the FoS. Slope stability analysis and seismic stability analysis are included in the technical memorandum. Final constructed slopes do no exceed 2:1 as shown in the updated drawing set.

Please refer to CCL's response in Section I.1.a, above.

14. For Drawing CS309 in Appendix F (Buttress Cross Sections STA. 28+00 TO ST A. 30+00), for Buttress STA 29+50:

a. If retaining wall(s) are required to achieve the grade proposed, provide the engineering designs or plans for the retaining wall. The retaining wall plans should be approved prior to commencement of grading work.

The South Basin is no longer a part of the project. No retaining walls are required to support grading in this area.

b. Proposed contours should tie into (E) or vertical elements should be shown (e.g., retaining wall).

CCL has included the proposed contours in the revised drawings (see Appendix F).

III. Response to June 29, 2026 PW Comments.

1. **Provide the units of measurement for the settlement values presented in Figure 1 of the Geotechnical Memorandum prepared by GLA.**

The units of measurement in Figure 1 are feet. This figure will be included in the design-level stability analysis report, and the units will be referenced in the revised figure. This design-level report is in progress and will be provided to EPA as soon as possible.

2. **While it appears that the deformation mechanism along the west slope is likely a trampolining effect resulting from MSW settlement, it is unclear why a similar response is not observed along the northern portion of the slope. Additional clarification or analysis is needed to explain this discrepancy.**

The subsurface conditions, surface topography, and mechanics of settlement are different along different portions of the western slope. The design-level analysis report will include a discussion and explanation of the observed and measured deformation along the western slope. This design-level report is in progress and will be provided to EPA as soon as possible.

3. **A slope stability model and corresponding output were not included in the Geotechnical Memorandum. As a result, it is not possible to determine how the site conditions were represented in the analysis.**

   Items to be considered when developing or revising the slope stability model include:

   a. *Incorporation of strength reduction due to excess pore water pressures.*

   b. *Determination of the representative height used in the Bray and Macedo (2019) displacement analysis.*

   c. *Selection of an allowable displacement threshold consistent with Bray and Macedo (2019).*

   d. *Identification of the probability-of-exceedance level associated with the allowable seismic displacement.*

This information will be included in the design-level analysis report. This design-level report is in progress and will be provided to EPA as soon as possible.

4. **The factors of safety presented in the technical memorandum for the proposed buttress are below County minimum standards. It is unclear whether these values fall within acceptable limits for landfill operations or meet the requirements of the regulating agency. Although it is reasonable to expect that the proposed buttress fill will improve stability, this improvement cannot be quantified because the slope stability input parameters and output results were not provided.**

This information will be included in the design-level analysis report. This design-level report is in progress and will be provided to EPA as soon as possible.

5. **While the buttress fill will likely improve the static factor of safety, it does not appear to directly address deformation resulting from settlement or the observed trampolining effect. Although these deformations may be reduced, the consultant should verify whether residual deformation, regardless of surface manifestation, could impact the liner system or lead to potential leachate seepage through the fill.**

Pre- and post-buttress modes of deformation will be addressed in the design-level stability analysis report. This design-level report is in progress and will be provided to EPA as soon as possible.

6. **Include a copy of this review sheet with your response.**

A copy of PW's review sheet has been attached to this response and will be attached again to the submittal of the design-level stability analysis report. This design-level report is in progress and will be provided to EPA as soon as possible.

Please let us know if you have any additional questions.

Sincerely,

Bill Haley

William Haley
Senior Project Engineer
Chiquita Canyon Landfill

Attachments

cc: John Perkey, Chiquita Canyon
Kevin Green, Chiquita Canyon
Jim Little, Chiquita Canyon
Kurt Shaner, Chiquita Canyon
Dylan Smith, Chiquita Canyon

Sarah Phillips, Chiquita Canyon
Megan Morgan, Beveridge & Diamond
Nicole Weinstein, Beveridge & Diamond
Allyn Stern, Beveridge & Diamond
Alana Mathews, California Environmental Protection Agency
Todd Sax, California Environmental Protection Agency
Sophia Carillo, California Environmental Protection Agency
Karen Gork, Los Angeles County Department of Public Health, acting as the Local Enforcement Agency
Thanne Berg, California Department of Toxic Substances Control
Dylan Clark, California Department of Toxic Substances Control
Zanalee Zmily, California Department of Toxic Substances Control
Laura Friedli, United States Environmental Protection Agency
Amy C. Miller-Bowen, United States Environmental Protection Agency
Michael Montgomery, United States Environmental Protection Agency
Los Angeles County Public Works, Geotechnical and Materials Engineering Division