

Archived: Friday, August 28, 2026 11:23:36 AM
From: [Kevin Green](#)
Sent: Tuesday, August 25, 2026 8:22:52 PM
To: [Friedli, Laura](#)
Cc: [Miller, Amy](#)
Subject: Re: Chiquita / US EPA Coordination on Open Items
Importance: Normal
Sensitivity: None

Good evening, Laura.

CCL provides below a status update on each outstanding item identified in EPA's August 6, 2026 correspondence. Shortly, you will receive a TitanFile link containing the attachments referenced below.

1. West Toe Buttress Work Plan and Designs – We received Chiquita's notification on Friday, July 31, 2026, that although CCL had anticipated having the final updates to the design documents for the West Toe Buttress on Friday, they are still under revision. Please submit those documents to EPA as soon as possible. EPA is amenable to reviewing those documents on a piecemeal basis, as appropriate. As a reminder, EPA is expecting to receive the following prior to issuing any approval of the West Toe Buttress Work Plan:

1. Revised Draft of West Toe Buttress Work Plan and Appendices, including:
 1. Draft versions updated to "final" (e.g., South Levee Technical Memo; Appendix E Earthwork Specifications);
 2. PE-Certified South Levee/Retaining Wall Designs;
 3. Updated Appendix D Stability Analysis which addresses DPW's comment Memo / Responses to DPW's Comment Memo;
 4. Final Appendix F Plans which address EPA's July 15th comments / Responses to EPA's July 15th Comments; and
 5. Stormwater-Engineer Certified Stormwater Infrastructure Designs**

*All sheets of the designs must be stamped by the civil engineer; additionally, any plans or analyses for geotechnical features or geotechnical calculations (including the retaining wall design) must be stamped by the geotechnical engineer.

**If the design for the stormwater infrastructure will lag, EPA may be able to issue partial approval, as appropriate.

On August 14, 2026, CCL submitted the Third Revised West Toe Buttress Work Plan and final, stamped design drawings (Appendix F), which incorporate responses to EPA's July 15 and July 22, 2026 emails as well as Los Angeles County Public Works' June 29, 2026 letter. The stormwater infrastructure designs are incorporated into the final Appendix F drawings, including the proposed concrete channels, roadway crossing swales, brow channels, down drains, and associated drainage features. As noted in prior email correspondence, the final design level stability analysis is in process. The consultant needed to have final design drawings before conducting the final stability analysis. CCL expects this analysis to be completed by August 28. That submission would be the final form of the Work Plan appendices, pending EPA approval.

2. West Toe Personal Air Samples – Is the worker exposure sampling of personal air samples from the breathing zone for benzene and acetonitrile, as provided for under the West Toe Buttress Health and

Safety Plan, available on The Response Group teams channel or otherwise available to EPA? If not, can you please provide us with access to this data?

CCL previously provided EPA with the requested worker exposure/personal air sampling data from the prior west toe project on May 8, 2026. CCL has provided this data in the TitanFile link for ease of reference. Please let us know if EPA has any issues with access.

3. Aeration Treatment Results – We understand from the LDU/Chiquita call this morning that Chiquita has received the remaining portions of the laboratory reports for the data package of aeration-treated leachate prepared for Los Angeles County Sanitation Districts. We look forward to receiving that package by the end of this week. If it looks like distribution will slip into next week, please let us know as soon as possible.

CCL is providing in the TitanFile link the aeration-treated leachate data package prepared for LACSD. The attached laboratory reports reflect the constituents from the original LACSD analytical list that the laboratories were able to analyze. CCL and its consultant also evaluated several additional constituents from the LACSD list and determined, following discussions with the laboratories, that those constituents could not be analyzed by a typical environmental laboratory. This limitation has previously been communicated to the LDU.

4. Underground Injection – On June 23, 2026, EPA provided contacts for CalGEM and EPA Region 9's UIC Permitting Section in response to Chiquita's inquiry regarding the potential use of Underground Injection Control (UIC) Class II wells as an outlet for treated, non-hazardous leachate. Has Chiquita reached out to these contacts? Please let us know if we can help facilitate conversations. We'd like to be involved earlier in the conversations to help our regulatory partners understand the context of Chiquita's disposal (i.e., to try to mitigate a situation such as with Wyoming DEQ and E&P facilities) and ensure these facilities are under consideration for potential inclusion in your response to our June 26 letter.

As discussed on August 12, CCL has been continuing its outreach to potential UIC Class II wells, but has not yet identified any as potential disposal outlets for treated, non-hazardous leachate. Once CCL identifies potential outlets, it will contact the CalGEM and EPA Region 9 contacts provided by EPA for assistance with permitting.

5. South Basin – We noted that the updated Appendix F, Plans, to the West Toe Buttress Work Plan did not include the design drawing for the South Basin. We also noted Chiquita's July 10 response acknowledging EPA's comment that EPA will not approve the plan for the South Basin as part of the West Toe Buttress work and if CCL would like EPA approval of the plan for the South Basin, CCL should submit the plans for the South Basin as an addendum or revision to the West Toe Pre-Emptive Secondary Containment Plan (April 2026) Rev. 1.4. Does Chiquita intend to pursue approval for the South Basin as part of the Pre-Emptive Secondary Containment Plan or is this still under consideration?

CCL is not currently moving forward with the South Basin. Accordingly, the South Basin was removed from the West Toe Buttress Project and is not included in the final Appendix F drawings.

6. (NEW QUESTION) Aeration Treatment – Questions were raised about the ongoing viability of aeration treatment. Can you please confirm how CCL plans to ensure functionality of the aeration treatment system continues despite the potential build-up of biofilm?

CCL plans to install Dissolved Air Flotation ("DAF") treatment systems for the clarifier tanks to enhance solids control, which will have a downstream effect to manage the buildup of solids, including biofilm, in the rest of the treatment system.

7. (NEW QUESTION) Reaction Area GCCS –

1. Collection System - Provide a reaction area gas collection as-built wellmap following completion of

the west toe buttress and the associated extensions/modifications made to the GCCS in the reaction area, including connections to non-traditional gas collection wells (surface collectors, leachate sumps, leachate risers, etc.).

The most recent as-built updated August 19, 2026, is provided in the TitanFile link. If requested, CCL can also provide an updated as-built once the west toe buttress is completed.

1. Control System - Provide the basic information for each currently in use thermal oxidizer and blower, include model, manufacturer, date of start up, and both landfill gas flow and supplemental gas flow capacities.

An Excel sheet summarizing the requested information as well as the manufacturer and/or engineering operating parameters is provided in the TitanFile link.

1. Control System testing – Pursuant to the SCAQMD abatement order or otherwise, provide any initial or follow up performance testing of the currently in use thermal oxidizers, including operating conditions during the test (landfill gas flow, landfill gas methane content, flame temperature, supplemental gas flow, airflow configuration, etc). Temperature measurements should adhere to [40 CFR 63.1961\(b\)\(1\)](#).

CCL is providing the performance testing reports for the Zeeco and Parnel TOx, as well as three recent leachate vapor testing reports, which show the landfill gas flow going to the TOx units. The performance testing report for the Hero TOx is currently with CCL's consultant, and CCL is working to obtain a copy. CCL will supplement this response with the Hero thermal oxidizer report when it becomes available.

1. Provide the manufacturer or engineering recommendations of operation parameter ranges.

As mentioned above, an Excel sheet with the manufacturer and/or engineering operating parameters is provided in the TitanFile link.

1. Provide a narrative explanation of how the thermal oxidizers control supplemental gas flow rates and/or other controls to meet necessary operating parameters to ensure compliant combustion of the landfill gas ([40 CFR 63.1959\(b\)\(2\)\(iii\)](#)).

The TOxs use continuous pilots or burners to maintain combustion. The Parnel TOx uses a continuous pilot to maintain a proven flame. The Hero TOx uses a continuous pilot and supplements with propane when the operating temperature drops. The Zeeco TOx use continuous pilots. The small TOx located in the tank farm for handling leachate vapors (the "Mini TOx") uses a continuous burner.

1. For each currently in use thermal oxidizer, from the date of start up or 3/1/26, whichever is later, provide the below data in an excel readable format.
 1. Periods of non-operation exceeding 1 hour and a description of the cause of shutdown and efforts to return the thermal oxidizer to operation

An Excel sheet listing downtimes exceeding one hour for each TOx unit since March 1, 2026, is provided in the TitanFile link. Consistent with SOFA Condition 82, the file also contains the downtime's duration and root cause. Regarding efforts to return the TOx to operation, CCL and its consultants perform the necessary maintenance operations to return the TOx units to full operation after each downtime event. This may include restarting the unit, repairing equipment, or performing cleaning. CCL does not, and is not required to, maintain records of specific actions taken to return the thermal oxidizer units to full operation.

2. Hourly average flare temperature

An Excel sheet listing each TOx units flare temperatures and gas flow rates since March 1, 2026, is provided in the TitanFile link.

3. Hourly average landfill gas flow rate

As mentioned above, an Excel sheet listing each TOx units flare temperatures and gas flow rates since March 1, 2026, is provided in the TitanFile link.

4. Hourly average landfill gas methane and hydrogen content

CCL is providing the ASTM D1946 laboratory analytical reports reflecting methane and hydrogen concentrations in landfill gas sampled at the TOx inlets during the requested period. The data are not hourly averages because there are no continuous gas monitors on the TOxs or flares. These data are not available in Excel format and therefore are being provided in PDF format.

5. Hourly average supplemental gas flow rate

CCL does not have hourly average supplemental gas flow rate data. Supplemental propane use is not required to be continuously tracked, and no hourly or weekly flow rate data have been collected. CCL has provided below the available propane delivery totals since March 1, 2026, associated with the TOxs. Where a propane account serves more than one TOx, the delivery records do not identify the amount attributable to each individual unit.

- Zeeco TOx No. 1: 14,744.4 gallons.
- Zeeco TOx Nos. 6 & 7: 10,224.2 gallons combined. Because these units use a common propane tank, CCL estimates that the total was split evenly between the units.
- Parnel and Hero TOxs: 23,754.5 gallons combined. CCL is currently unable to determine the portion attributable to each individual TOx.
- Mini TOx: 36,830.8 gallons.

Please let me know if you have any questions.

Thank you,
Kevin

Kevin Green
District Manager
Chiquita Canyon Landfill
661-812-5846

From: Friedli, Laura

Sent: Thursday, August 6, 2026 12:05 PM

To: Kevin Green

Cc: Miller, Amy; Marincola, Jamie; Sakow, Rick; Relon, Mark Anthony; Holybee, Tyler; Connolly, Scott; Tinger, John; Wall, Steve; Clark, Jocelyn; Sarah Phillips; John Perkey; Dylan Smith; WILLIAM.HALEY@WasteConnections.com; Matthew.Breuer@WasteConnections.com; Kurt Shaner; Jim Little; Megan L. Morgan; Nicole B. Weinstein; Allyn L. Stern

Subject: Re: Chiquita / US EPA Coordination on Open Items

Hi Chiquita team,

To help keep us aligned on loose ends, we put together a summary of outstanding items. Please see below a list of pending items and a couple of new inquiries from EPA for your consideration:

Items We are Waiting on from CCL

1. West Toe Buttress Work Plan and Designs – We received Chiquita's notification on Friday, July 31, 2026, that although CCL had anticipated having the final updates to the design documents for the West Toe Buttress on Friday, they are still under revision. Please submit those documents to EPA as soon as possible. EPA is amenable to reviewing those documents on a piecemeal basis, as appropriate. As a reminder, EPA is expecting to receive the following prior to issuing any approval of the West Toe Buttress Work Plan:
 1. Revised Draft of West Toe Buttress Work Plan and Appendices, including:
 - i. Draft versions updated to "final" (e.g., South Levee Technical Memo; Appendix E Earthwork Specifications);
 - ii. PE-Certified South Levee/Retaining Wall Designs;
 - iii. Updated Appendix D Stability Analysis which addresses DPW's comment Memo / Responses to DPW's Comment Memo;
 - iv. Final Appendix F Plans which address EPA's July 15th comments / Responses to EPA's July 15th Comments; and
 - v. Stormwater-Engineer Certified Stormwater Infrastructure Designs**

*All sheets of the designs must be stamped by the civil engineer; additionally, any plans or analyses for geotechnical features or geotechnical calculations (including the retaining wall design) must be stamped by the geotechnical engineer.

**If the design for the stormwater infrastructure will lag, EPA may be able to issue partial approval, as appropriate.
3. West Toe Personal Air Samples – Is the worker exposure sampling of personal air samples from the breathing zone for benzene and acetonitrile, as provided for under the West Toe Buttress Health and Safety Plan, available on The Response Group teams channel or otherwise available to EPA? If not, can you please provide us with access to this data?
4. Aeration Treatment Results – We understand from the LDU/Chiquita call this morning that Chiquita has received the remaining portions of the laboratory reports for the data package of aeration-treated leachate prepared for Los Angeles County Sanitation Districts. We look forward to receiving that package by the end of this week. If it looks like distribution will slip into next week, please let us know as soon as possible.
5. Underground Injection – On June 23, 2026, EPA provided contacts for CalGEM and EPA Region 9's UIC Permitting Section in response to Chiquita's inquiry regarding the potential use of Underground Injection Control (UIC) Class II wells as an outlet for treated, non-hazardous leachate. Has Chiquita reached out to these contacts? Please let us know if we can help facilitate conversations. We'd like to be involved earlier in the conversations to help our regulatory partners understand the context of Chiquita's disposal (i.e., to try to mitigate a situation such as with Wyoming DEQ and E&P facilities) and ensure these facilities are under consideration for potential inclusion in your response to our June 26 letter.
6. South Basin – We noted that the updated Appendix F, Plans, to the West Toe Buttress Work Plan did not include the design drawing for the South Basin. We also noted Chiquita's July 10 response acknowledging EPA's comment that EPA will not approve the plan for the South Basin as part of the West Toe Buttress work and if CCL would like EPA approval of the plan for the South Basin, CCL should submit the plans for the South Basin as an addendum or revision to the West Toe Pre-Emptive Secondary Containment Plan (April 2026) Rev. 1.4. Does Chiquita intend to pursue approval for the South Basin as part of the Pre-Emptive Secondary Containment Plan or is this still under consideration?
7. (NEW QUESTION) Aeration Treatment – Questions were raised about the ongoing viability of aeration treatment. Can you please confirm how CCL plans to ensure functionality of the aeration treatment system continues despite the potential build-up of biofilm?
8. (NEW QUESTION) Reaction Area GCCS –

1. Collection System - Provide a reaction area gas collection as-built wellmap following completion of the west toe buttress and the associated extensions/modifications made to the GCCS in the reaction area, including connections to non-traditional gas collection wells (surface collectors, leachate sumps, leachate risers, etc.).
2. Control System - Provide the basic information for each currently in use thermal oxidizer and blower, include model, manufacturer, date of start up, and both landfill gas flow and supplemental gas flow capacities.
3. Control System testing – Pursuant to the SCAQMD abatement order or otherwise, provide any initial or follow up performance testing of the currently in use thermal oxidizers, including operating conditions during the test (landfill gas flow, landfill gas methane content, flame temperature, supplemental gas flow, airflow configuration, etc). Temperature measurements should adhere to 40 CFR 63.1961(b)(1).
4. Provide the manufacturer or engineering recommendations of operation parameter ranges.
5. Provide a narrative explanation of how the thermal oxidizers control supplemental gas flow rates and/or other controls to meet necessary operating parameters to ensure compliant combustion of the landfill gas (40 CFR 63.1959(b)(2)(iii)).
6. For each currently in use thermal oxidizer, from the date of start up or 3/1/26, whichever is later, provide the below data in an excel readable format.
 1. Periods of non-operation exceeding 1 hour and a description of the cause of shutdown and efforts to return the thermal oxidizer to operation
 2. Hourly average flare temperature
 3. Hourly average landfill gas flow rate
 4. Hourly average landfill gas methane and hydrogen content
 5. Hourly average supplemental gas flow rate

Items EPA is Working On

1. Summary Regarding Disposal and Off-Site Rule – We are preparing a letter summarizing EPA's decisions regarding potential disposal outlets and Off-Site Rule determinations, as requested by Sarah during last week's MCAT LDU/Chiquita call.
2. Emergency Exemption for Avalon – We are reviewing the July 1st letter in coordination with the Water Division and LACSD to confirm Avalon is authorized to discharge an average of 62,500 gallons/day, and will coordinate with the OSCs as appropriate to modify the Emergency Exemption.
3. Status Call Re: Long-term Treatment – We are confirming with DTSC that 8/12 2:00-3:00pm PST works. Please tentatively hold this time for the call.
4. Prioritization of Disposal to Hazardous Facilities – Confirming we received the letter dated August 4, 2026, from Chiquita to EPA and DTSC regarding off-site shipment of characteristically hazardous leachate. We will coordinate with DTSC on evaluating this submission.

Please let us know if you'd like to have a call on any of this.

Thank you,
Laura
Laura Friedli
Attorney-Advisor
U.S. EPA Region IX
Friedli.Laura@epa.gov
d: (415) 972.3325