

Chiquita Canyon Landfill: Community Exposure Mitigation Plan

Version 3

September 4, 2026

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INTRODUCTION

Site Description

The Chiquita Canyon Landfill (the “Landfill”) is approximately 639 acres with 400 acres permitted for waste disposal. It is located in northeastern Los Angeles County in the unincorporated community of Castaic, California, approximately 3 miles west of Interstate 5 on State Route 126 in the Santa Clarita Valley. The Landfill stopped accepting public waste on January 1, 2025.

The constructed landfill consists of three modules (2B/3/4, 4, and 5), six cells (2 PH 2A, 2 PH 2B, 1/2A, 6, 8A and 8B), and six canyon fills (Primary Canyon, Canyon A, Canyon B, Canyon C Cell 1, Canyon C Cell 2 PH1, and Canyon D). The Primary Canyon (approximately 55 acres) operated from 1970 to 1987, and Canyon B (approximately 15 acres) operated from 1987 to 1988. The “Main Canyon” is comprised of Canyons A, C, and D, and Cells 1 through 6 and 8. The Primary Canyon and Canyon B are separate from the Main Canyon and not impacted by the elevated temperature landfill (“ETLF”) event.

Purpose

Chiquita Canyon, LLC (“Chiquita”) developed the Community Exposure Mitigation Plan (“Plan”) in response to Los Angeles County Department of Public Health’s (“DPH”) directive dated April 14, 2026, and further feedback provided on July 31, 2026. The purpose of this Plan is to consolidate all existing ongoing community-facing measures that may be considered if a Qualifying Slope Failure (hereinafter defined) occurs and causes or is reasonably expected to cause material off-site impacts. The impacts of a Qualifying Slope Failure could vary greatly depending on the type and location of such failure. It would be impossible for Chiquita to try to list every possible combination of outcomes and the steps Chiquita would take in response to such outcomes. This document includes potential options for community protective measures that would be deployed as needed depending on the type of Qualifying Slope Failure and resulting impacts to the community. The type of measures implemented would be selected based on risk-based and health-based determinations, which would be made looking at available information, including objective, scientific data from community air monitoring stations and observational data from community odor surveillance and odor complaints, as well as guidance and expertise from Chiquita’s regulators. This document includes clear, direct access procedures for all community protective measures that could be implemented and explains how a Qualifying Slope Failure and any resulting material off-site impacts, and the measures implemented, would be communicated to the community.

This Plan aligns with existing Environmental Protection Agency (“EPA”) directed work plans, monitoring programs, contingency plans, and public health coordination efforts. However, this is a standalone document that does not require cross-reference to other documents. This Plan consolidates community-facing measures currently in place and describes additional actions that may be implemented.

For purposes of this Plan, a “Qualifying Slope Failure” means an unplanned and material displacement of landfill waste, cover, or a waste containment structure that Chiquita determines, based on documented site observations, available instrumentation or monitoring information, and

evaluation by qualified geotechnical or engineering personnel, has resulted or is reasonably expected to result in a material off-site release or a material worsening of off-site landfill-related odor conditions. Ordinary settlement, surficial cracking, erosion, localized movement, planned excavation or construction activity, and movement that remains contained on-site without actual or reasonably expected material off-site impacts do not, by themselves, constitute a Qualifying Slope Failure. A report, allegation, or characterization by any third party or governmental agency may prompt Chiquita to evaluate whether a Qualifying Slope Failure has occurred, but does not, by itself, establish that one has occurred or automatically activate the community protective measures described in this Plan.

This Plan is a contingency plan. Its preparation, submission, or implementation does not constitute an admission that a Qualifying Slope Failure has occurred, is occurring, or is imminent; that any particular odor or reported condition was caused by a slope failure or by the Landfill; or that any person is entitled to a particular measure described in this Plan.

This Plan describes a contingent response framework and does not create contractual rights, third-party-beneficiary rights, private rights of action, admissions, presumptions, or legally enforceable entitlements in favor of any person or governmental entity. Chiquita retains the right to modify, discontinue, substitute, or decline a particular voluntary measure based on site conditions, technical information, public health considerations, legal requirements, availability, safety, and the totality of the circumstances. Nothing in this paragraph limits an obligation imposed by otherwise applicable law or by a valid order issued by an entity acting within its lawful authority.

Existing Frameworks

Community protection measures associated with the ETLF event at the Landfill have been developed through an extensive multi-agency response effort involving federal, state, and local agencies. Existing response activities include continuous air monitoring, community odor surveillance, public health review of monitoring data, public communications, contingency planning, emergency preparedness, and implementation of engineering controls intended to minimize the potential for off-site impacts.

Significant community protection efforts are integrated into the existing EPA-coordinated response framework and include participation by public health, environmental, emergency response, and regulatory agencies.

This Plan builds upon those existing programs and identifies how they will be applied in the unlikely event of catastrophic slope failure. **Appendix 1** lists agency and emergency contacts. **Appendix 2** identifies the South Basin pipe plug standard operating procedure. **Appendix 3** provides additional information regarding the monitoring programs summarized below. **Appendix 4** provides language from the Stipulated Order related to community notifications for certain air monitoring exceedances.

OVERVIEW

In the event of credible information indicating that a potential Qualifying Slope Failure has occurred at the Landfill, Chiquita will promptly investigate the reported condition and determine in its sole

discretion whether it satisfies the definition of a Qualifying Slope Failure for purposes of this Plan. If Chiquita determines that a Qualifying Slope Failure has occurred, it will implement the response framework below. The response will be tailored to the location and nature of the event and the potential for community impacts. Pending that determination, Chiquita may undertake appropriate interim investigation, containment, monitoring, notification, or protective measures based on the information then available. Undertaking any such interim measure does not constitute a determination or admission that a Qualifying Slope Failure has occurred.

1. **On-Site Actions.** Take necessary on-site action to contain slumped materials and prevent an off-site discharge or release.
2. **Data Evaluation.** Evaluate available information, including air monitoring data, odor surveillance results, odor complaints, meteorological data, surface emissions data, and relevant Landfill operating and site-condition information to assess whether a Qualifying Slope Failure has caused or is reasonably expected to cause material off-site impacts.
3. **Ongoing Monitoring.** If the evaluation identifies no changes above baseline or potential off-site impacts, continue monitoring and reassess as conditions change.
4. **Community Notification Protocols.** If the evaluation identifies changes above baseline or actual or expected off-site impacts caused by a Qualifying Slope Failure, initiate appropriate community notification protocols.
5. **Community Protective Measures.** If the evaluation identifies actual or expected off-site impacts caused by a Qualifying Slope Failure, implement community protective measures appropriate to the evaluated conditions.
6. **Risk-Based Health Assessment.** If the evaluation identifies actual or expected off-site impacts caused by a Qualifying Slope Failure, retain a third-party to conduct a prompt risk-based health assessment of available information to inform the immediate community protective measures that may be necessary.

Throughout the response, Chiquita will communicate with regulators as required and coordinate regarding appropriate response actions and community communications.

Regulatory Coordination

Specific points of contact for agency personnel are provided in **Appendix 1**. In the event of a Qualifying Slope Failure, Chiquita will contact the relevant agency contacts and follow direction provided by the regulators, in addition to steps described in this Plan. The DPH, certified by the California Department of Resource Recovery and Recycling (“CalRecycle”) to act as the Local Enforcement Agency, will be notified in the event of an emergency related to the landfill with potential offsite impacts.

ON-SITE ACTIONS

If a Qualifying Slope Failure occurs, or conditions indicate that such failure may result in an off-site discharge or release, Chiquita will evaluate and implement appropriate on-site actions to contain liquids and solids, prevent off-site migration, and support removal and proper management of released materials. The actions implemented will depend on the location and conditions of the event and may include the following containment features and response actions.

North Levee

Chiquita constructed the North Levee in 2024 as a preemptive measure with the construction of the West Toe Drainage Project.

The North Levee is located on Chiquita's property and was constructed on a natural geographic saddle to prevent any release of liquid or sediment that could overflow the saddle and affect adjoining property to the west. The North Levee was constructed of precast concrete gravity blocks and a compacted soil fill berm to minimize the footprint for the structure. The North Levee was constructed to achieve a top elevation on its crest of 1230 feet mean sea level.

The North Levee has remained in place and functional since September 2024.

Stormwater Basins

The South Basin is a two-stage basin with a concrete dam at elevation 974 feet above mean sea level ("ft-msl") and a spillway structure along the west side at elevation 972 ft-msl. Stormwater from the northern and western sides of the landfill flows south and enters the basin at the northwest corner. Discharge from the South Basin occurs via two standpipes on the south end of the basin. The discharge from these two standpipes daylights just south of the basin prior to flowing under Highway 126.

In the event of a Qualifying Slope Failure, if necessary, Chiquita would deploy pipe plugs in the South Basin outlet standpipes to temporarily contain liquids and prevent them from leaving the site. Use of the pipe plugs allows the South Basin to provide up to 3.7 million gallons of containment capacity at full pool elevation. A standard operating procedure for deployment of the pipe plugs is identified in **Appendix 2**. High-capacity pumps and temporary liquid storage vessels capable of managing hazardous liquids are readily available for deployment if this measure is used.

The Landfill also has an East Basin, managed by the site storm drain system. Chiquita has installed a liner seal against the East Basin culvert's concrete structure and filled it in with sand to completely block any stormwater from reaching the outlet and discharging. As a result, no stormwater can leave the site through this discharge point.

On-Site Monitoring During the Response

Chiquita will use existing visual monitoring, drone-based topographical surveys, slope-stability observations, leachate inspections, and monitoring of the containment and leachate collection systems to identify conditions requiring additional action. Chiquita will continue to record and report inspections and responsive actions as required.

DATA EVALUATION

Following Chiquita's determination that a Qualifying Slope Failure has occurred, Chiquita will promptly evaluate available information to determine whether conditions have changed above baseline and whether off-site impacts are occurring or are expected. If the evaluation identifies no changes above baseline or potential off-site impacts caused by the Qualifying Slope Failure, Chiquita

will continue monitoring and reassess as conditions change. If the evaluation identifies changes above baseline or actual or expected off-site impacts, Chiquita will use the evaluation to inform community notifications, community protective measures, and the risk-based health assessment described below. Temporal proximity between an alleged slope condition and a reported odor or other condition does not, by itself, establish causation.

Current Monitoring and Data Sources

The chart below summarizes the current monitoring and data sources Chiquita may use in its evaluation of available information.

Data Source	Current Information Available
Continuous air monitoring	Continuous PM _{2.5} , PM ₁₀ , H ₂ S, CH ₄ , SO ₂ , and meteorological data at MS-01 through MS-12; hourly DMS and speciated VOC data, including acrolein, from micro-GCs at MS-01, MS-02, MS-03, MS-04, MS-06, MS-07, MS-08, MS-10, MS-11, and MS-12.
Discrete and time-integrated air sampling	Monthly South Coast Air Quality Management District ("South Coast AQMD") Method 307.91 sulfur and EPA Method TO-15 VOC samples; weekly 24-hour samples at MS-06 through MS-12; and monthly Rule 1150.1 samples collected upwind and downwind of the Landfill.
Landfill surface monitoring	Integrated landfill surface samples and instantaneous surface emissions monitoring across the Reaction Mitigation Area at least three times per month and across the remainder of the Landfill at least four times per quarter, together with corrective action and follow-up results.
Community odor surveillance	Community odor surveillance results from 38 locations, including the location, time, odor character and strength, wind and weather conditions, recurrence of detected odors, and written records of responsive actions.
Community odor complaints	Community odor complaints as reported directly to Chiquita or as reported to South Coast AQMD and then to Chiquita.
Site and operating conditions	Available information regarding slope stability, landfill cover and containment systems, leachate seepage or pooling, landfill gas collection and control systems, and current weather and wind conditions.

The image below provides a summary of the community air monitoring data listed in the chart above as well as their sampling locations.

Air Monitoring Program

Location/ Sample Name	Continuous			Monthly Discrete	24-Hour	12-Hour
	H ₂ S/ PM ₁₀ / PM _{2.5}	CH ₄ SO ₂	VOC via Micro-GC	307.91 - Sulfur TO-15 - Full List Sampling	307.91 - Sulfur TO-15 - SIM	H ₂ S 1150.1 Table 1 VOCs
Sample Schedule				*	Mon-Tues	Monthly
On-Site	MS-01	X	X	X	X	
	MS-02	X	X	X	X	
	MS-03	X	X	X	X	
	MS-04	X	X	X	X	
	MS-05	X	X	X	X	
	1150.1 Upwind					X
	1150.1 Downwind					X
Off-Site	MS-06	X	X	X	X	
	MS-07	X	X	X	X	
	MS-08	X	X	X	X	
	MS-09	X	X	X	X	
	MS-10	X	X	X	X	
	MS-11	X	X	X	X	
	MS-12	X	X	X	X	

*Discrete sampling at 5 out of 12 locations each month on a rotating basis



Evaluation Approach

In the event of a Qualifying Slope Failure, Chiquita will conduct a holistic and data-driven evaluation of the available information. The evaluation will consider, as applicable, the location and timing of monitoring results; the concentration of monitored compounds and applicable reference levels; the location, character, strength, geographic distribution, and recurrence of observed or reported odors; wind speed and direction; weather conditions; contemporaneous monitoring results; and relevant Landfill operating and site conditions.

Continuous and time-integrated air monitoring data are available on Chiquita's Air Monitoring webpage at <https://chiquitacanyon.com/reports/community-air-monitoring-program/>. Weekly air monitoring network summaries and reports containing the landfill surface monitoring records are posted on Chiquita's Odor Mitigation website at <https://chiquitacanyon.com/odor-mitigation/stipulated-order-for-abatement/>. Additional information regarding the monitoring programs and equipment is provided in **Appendix 3**.

COMMUNITY NOTIFICATION PROTOCOLS

If the data evaluation identifies changes above baseline or actual or expected off-site impacts caused by a Qualifying Slope Failure, Chiquita will communicate with the public regarding site conditions, response actions, and available community resources. A public notification and related updates will be posted predominantly on chiquitacanyon.com, including in the website's News & Alerts section and on the website's homepage, and, when appropriate, distributed through Chiquita's established community notification channels.

Those channels may include email, text message, telephone, U.S. Mail, outreach to community partners and neighbors, emergency alert systems, and media communications. Public notices will identify, as applicable, the nature and anticipated duration of the event, the potentially affected areas, protective measures or community resources being offered, the dates and hours when those resources will be available, locations and access instructions, available transportation assistance, applicable safety or participation guidelines, and contact information for questions. Materials and updates will be provided in English and Spanish. Chiquita will issue additional updates as conditions or relevant arrangements—including hours, locations, transportation services, or access instructions—change. If community members have questions regarding available resources, they may contact Chiquita by phone at (661) 257-3655 during business hours (Monday through Friday from 7:00 a.m. to 5:00 p.m. and Saturday from 7:00 a.m. to 2:00 p.m.) or at (877) 263-2561 after hours. Chiquita may also be reached by email at info@chiquitacanyon.com.

Existing automatic email and text message notifications for applicable benzene and H₂S exceedances will continue in accordance with the Stipulated Order. The full text of the Stipulated Order's requirements related to these notifications is provided in **Appendix 4**. Chiquita will also follow any further direction from its regulators regarding community notification.

COMMUNITY PROTECTIVE MEASURES

Slope failures are unlikely, and a Qualifying Slope Failure scenario requiring significant community protective measures is even less so. To the extent Chiquita determines that a Qualifying Slope Failure has caused or is reasonably expected to cause material off-site impacts, Chiquita will evaluate the severity of the impacts and deploy response measures as warranted by the situation to nearby, affected residents. Response measures may include those described below and will be informed by the data evaluation and, as applicable, the risk-based health assessment. The identification of a measure in this Plan does not mean that the measure is required in every circumstance, and no single monitoring result, odor observation, complaint, or agency characterization automatically requires implementation of a particular measure.

Chiquita will coordinate with EPA and applicable emergency response and health agencies as appropriate to ensure risk-based and health-protective measures are implemented in accordance with guidance from the agencies with relevant expertise.

Cool Zone

Chiquita will evaluate the need for a temporary Cool Zone for residents in the surrounding areas.

Any such Cool Zone will be located at the Embassy Suites Hotel located off Newhall Ranch Road and I-5, or at another nearby hotel or alternate location depending on availability. The Cool Zone will be set up in a large meeting room space with air conditioning, television, Wi-Fi, workspaces, and complimentary refreshments. Chiquita will publish a notice of the location, dates, and times of the Cool Zone on chiquitacanyon.com and provide notice through its existing email notification system.

Chiquita will maintain a sign-in table at any Cool Zone as well as an individual stationed at the sign-in table to ensure community member safety and compliance with the location's guidelines when

community members are present at the Cool Zone. Chiquita and the host location will comply with all applicable federal and state accessibility requirements, including those governing service animals. If the host location has policies regarding outside food and beverages in its meeting spaces, Chiquita will comply with those policies for the purposes of the Cool Zone.

Cool Zone entertainment will be provided in the form of a shared television when possible. The television will be a shared amenity provided by the host location for the benefit of all Cool Zone visitors. The default programming will be adjusted to family-friendly content appropriate for the range of ages using the space. The television will most likely be the property of the host location, not Chiquita. Depending on host location policies, Cool Zone visitors are welcome to bring their own family-friendly board games, video games and related equipment, coloring books, puzzles, and other appropriate entertainment.

Chiquita will evaluate whether residents may need transportation assistance to reach the Cool Zone. Such assistance will be prioritized for individuals with mobility limitations, elderly residents, and households without available transportation. Information regarding availability, scheduling, and access will be posted on Chiquita's website and communicated through established community-notification channels.

Distribution of Personal Protective Equipment

If offsite monitoring data and other available information, including community odor surveillance results, indicate that personal protective equipment ("PPE") would provide an appropriate interim protective measure, Chiquita will procure and distribute such equipment to affected residents. Depending on conditions, PPE may include respiratory protection, disposable protective equipment, or other materials recommended by responding agencies.

Since 2023, Chiquita has distributed nearly 3,000 air purifiers to community members and local schools. Most of these units are designed to operate without replacement filters. If offsite monitoring data indicate that the provision of additional air purifiers would be appropriate, Chiquita will provide additional air purifiers to community members that request such units. Chiquita has posted cleaning guidance on its website to help residents maintain and maximize the effectiveness of the units already distributed.

Temporary Relocation

If Chiquita determines, based on the totality of available information, that a Qualifying Slope Failure has caused or is reasonably expected to cause material off-site odor or exposure conditions that cannot reasonably be addressed through less disruptive protective measures, Chiquita may offer voluntary temporary relocation assistance to specifically-affected residents. Chiquita will identify affected areas for potential relocation and duration of relocation in consultation with its regulators. Any offer of voluntary temporary relocation assistance by Chiquita will be determined by Chiquita on a case-by-case basis, taking the totality of the circumstances into account, including proximity to the Landfill, relevant monitoring data, odor surveillance results, meteorological conditions, and the geographic distribution and recurrence of reported odors; the apparent source, nature, intensity, duration, and persistence of the reported condition; whether the condition is attributable to the Qualifying Slope Failure; the needs and circumstances of the affected resident or household; and the

availability and effectiveness of other protective measures. A governmental evacuation or shelter-in-place order may be issued only by an agency possessing the applicable legal authority and is distinct from voluntary temporary relocation assistance that may be offered by Chiquita.

If temporary relocation is offered, Chiquita will inform eligible residents and provide information regarding available lodging, duration, payment arrangements, and other applicable logistics through its established community notification channels. Specific arrangements will be determined at the time based on lodging availability, the number and needs of affected individuals or households, and the anticipated duration of the relocation. Potential lodging options include nearby hotels or alternate lodging depending on availability, subject to availability and the needs of affected individuals or households. If temporary relocation is offered, Chiquita will state at that time how payment will be arranged, i.e., vouchers or reimbursement. Reimbursement is limited to reasonable, documented, pre-approved expenses incurred in accordance with the terms communicated by Chiquita. Nothing in this Plan creates an entitlement to relocation, reimbursement, or any other benefit based solely on a request, complaint, agency assertion, or alleged slope condition.

RISK-BASED HEALTH ASSESSMENT

If the data evaluation identifies changes above baseline or actual or potential off-site impacts associated with a Qualifying Slope Failure, Chiquita will retain a third party with public health expertise to conduct a prompt risk-based health assessment of the available information. The assessment is intended to inform immediate health-protective measures during the response and is not intended to be a long-term study. The assessment will be based on available monitoring and sampling data and will assist in determining whether additional community protective measures or additional monitoring and sampling data are warranted under the circumstances.

The assessment will apply California Ambient Air Quality Standards and applicable California Office of Environmental Health Hazard Assessment standards and reference exposure levels appropriate to the duration and nature of the potential exposure. Chiquita will coordinate with DPH, OEHHA, and/or other appropriate regulatory agencies, as warranted, to identify the health-based screening levels and comparison values applicable to the conditions being evaluated. The third-party evaluator will evaluate monitoring and sampling results using averaging periods and exposure assumptions appropriate to the selected screening levels. It will evaluate potential health impacts associated with DMS, H₂S, other speciated sulfur compounds, and hazardous air pollutants detected in relevant monitoring or sampling results; include an odor assessment in addition to applicable health risk considerations; identify applicable action levels and recommended actions for exposed persons; and provide recommendations to limit anticipated adverse health impacts.

In conducting the assessment, the third-party evaluator may consider data from the existing community and perimeter monitoring network, event-specific sampling, field observations, and other relevant information available at the time. Odor complaints may also be considered, but only in conjunction with objective monitoring and sampling data. Based on the results of the assessment, Chiquita will evaluate whether additional community protective measures are appropriate and if the health-based risk assessment findings indicate that additional community protective measures may be warranted, Chiquita will cooperate with the appropriate public health and emergency response

agencies to identify and implement appropriate measures that fall within those agencies' respective authorities. The assessment may be updated as additional information becomes available.

APPENDIX 1

Emergency Organizations and Contact Information

Emergency	Organizations	Telephone
Explosive/Chemical Mitigation	DTSC's Emergency Response Unit (ERU)	916.255.6504 800.260.3972
	California Office of Emergency Services (OES)	800.852.7550
	Los Angeles County Fire Department	661.257.4144 (Day) / 911
Hazardous Waste Release	EPA Region 9 Emergency Response Section	800.300.2193
	South Coast Air Quality Management District	800.572.6306
	California Regional Water Quality Control Board	213.620.2246
	Los Angeles County Department of Public Health	888.700.9995
	National Response Center (NRC)	800.424.8802
	Clean Harbors Environmental Services	800.645.8265
	Los Angeles County Fire Department (Health HAZMAT)	323.890.4317 (Day) / 911
Release in Waterway	National Response Center (NRC)	800.424.8802
	California Regional Water Quality Control Board	213.576.6600
	California Fish and Wildlife	888.334.2258
Security	Los Angeles County Sheriff's Office	661.255.1121 (Day) / 911
	California Highway Patrol (CHP)	661.600.1600
	Security (Excalibur Security)	310.919.8780
State and Local Services	Henry Mayo Newhall Hospital	661.253.8000
	First Care Occupational Clinic	661.295.2500
	Regional Planning Committee	661.253.0111

Emergency	Organizations	Telephone
	California Emergency Management Agency (Cal-EMA)	800.852.7550

APPENDIX 2

Emergency Plug Installation		
Chiquita Canyon Landfill (CCL)		Task Description: Install plugs in an emergency pre-emptive measure to stop liquid from flowing out of the south stormwater basin
Date: 6/27/24	Revision: 0	

Necessary Supplies:	An air compressor with a pressure gauge. Two people are recommended for installation.
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Task Step	Actions, Notes, and Pictures
1	Locate the plugs if they are not already in the pipe. If not already in the pipe, they will be nearby, as they will be secured to the pipes themselves.
2	IF the plugs are already in the pipes, skip to Step 3. IF the plugs are not already in the pipes, put them into the pipes in the end segment that is tarred.
3	Inflate the plugs to around 7-8 psi. Inflating the plugs will cause a large growth – this is normal and even a max width of plug it remains at low pressures.



APPENDIX 3

The following information provides additional detail regarding the current air monitoring and community odor surveillance programs summarized in the Data Evaluation section above.

Summary of Chiquita's Air Monitoring Plan

Chiquita currently maintains an Air Monitoring Plan ("AMP") under the Unilateral Administrative Order issued by the U.S. Environmental Protection agency. The AMP incorporates requirements from South Coast AQMD Rule 1150.1, Chiquita's 2019 Community Air Monitoring Program ("CAMP"), Chiquita's 2023 enhanced Community Air Monitoring Program ("E-CAMP"), and the Stipulated Order for Abatement with South Coast AQMD. Chiquita will use the data from the AMP to assess appropriate measures to take in the event of a catastrophic slope failure.

South Coast AQMD Rule 1150.1

Rule 1150.1 governs the control of gaseous emissions from landfills. In accordance with Rule 1150.1, Chiquita has developed and is implementing an alternative compliance plan for this rule. This plan has been integrated into Chiquita's federal Title V operating permit.

CAMP

The CAMP identifies locations, parameters, and procedures for implementation of both continuous and discrete air monitoring in the community surrounding the Landfill. The CAMP was fully implemented in September 2022 when the last air monitoring station came online.

E-CAMP

The E-CAMP was prepared in response to identified chemical reactions in the waste mass at the Landfill and increased odors in the community around the Landfill. Weekly 24-hour time-integrated sampling at MS-06 through MS-12 continues.

Stipulated Order

South Coast AQMD issued a Stipulated Order for Abatement in Case No. 6177-4 ("Stipulated Order") that incorporates additional air monitoring and community odor surveillance requirements. The Stipulated Order was most recently modified on June 3, 2026.

Installation and Operation of Air Monitoring Equipment

Air monitoring equipment has been deployed as part of existing air monitoring requirements and work plans that have been developed for the Landfill.

South Coast AQMD Rule 1150.1

In addition to general monitoring and operational parameters for the perimeter migration monitoring probes, surface emissions monitoring ("SEM"), and landfill gas ("LFG") collection and control system ("GCCS"), the alternative compliance plan developed in accordance with Rule 1150.1 contains provisions for onsite ambient air monitoring (upwind and downwind of the refuse footprint) on a quarterly basis from pre-designated upwind and downwind locations. Chiquita now collects these samples on a monthly basis.

Ambient air samplers used for compliance with Rule 1150.1 are temporary samplers, constructed and installed, and continue to be operated on a monthly basis to meet South Coast AQMD design criteria and performance specifications. Ambient air samples are collected over two, 12-hour periods, beginning between 9am and 10am. Samples are collected in 10-liter Tedlar bags that are contained within a light-shielded box, within each sampling enclosure.

As shown in **Table 2** below, ambient air samples are collected on a monthly basis from both upwind and downwind of the Landfill. Samples collected are analyzed for TOC measured as methane, as well as for the LFG components listed in Table 1 of South Coast AQMD Rule 1150.1. Those chemicals are found in **Table 1**.

CAMP

As of October 2022, the CAMP is comprised of a network of twelve (12) continuous air monitoring stations (“MS” or “Stations”) with seven (7) stations located throughout the community surrounding the Landfill (MS-06 through MS-12) and five (5) stations located onsite (MS-01 through MS-05), around the Landfill perimeter (the Landfill perimeter air monitoring stations serve as a reference for any off-site exceedances that may be detected). At each MS location, continuous monitoring is conducted for select analytes and periodic discrete (e.g., grab) sampling is conducted.

The equipment used for the CAMP continuous monitoring is the Aeroqual AQM, equipped to continuously monitor particulate matter with an aerodynamic diameter of ten (10) micrometers or less (“PM₁₀”), particulate matter with an aerodynamic diameter of 2.5 micrometers or less (“PM_{2.5}”), hydrogen sulfide (“H₂S”), methane (“CH₄”), and sulfur dioxide (“SO₂”); as well as internal/external temperature and relative humidity. Wind speed and direction are collected using the Met One MSO multi-sensor, capable of measuring wind speed, wind direction, barometric pressure, air temperature, and relative humidity.

Five stations (MS-02 located onsite, MS-04 located onsite, MS-10 located at Hasley Canyon Park, MS-11 located at West Ranch High School, and MS-12 located in the Val Verde Community) are currently directly powered from the grid. The remaining seven (7) stations are independently solar powered, with 1- to 2-day battery backup. The solar array at each station was designed to power the air monitoring station, with up to three (3) days backup. For the grid-powered facilities, there is also a 2- to 3-day backup power supply at each location.

As part of the CAMP, on a monthly basis, a total of five (5) air samples are collected at community air monitoring stations and analyzed for LFG constituents. Three (3) samples are collected in the community surrounding the Landfill, with two (2) samples collected from either side of the Landfill generally in line with the community monitor sampling locations for each month. The overall intent is to cover all monitoring stations within the surrounding community every quarter for the duration of the CAMP.

- Rotation 1: Samples collected from northwest of the Landfill (MS-07, MS-08, and MS-12) with in line Landfill samples locate at MS-04 and MS-03.
- Rotation 2: Samples collected from northeast of the Landfill (MS-06, MS-09, MS-10) with in line Landfill samples located at MS-01 and MS-02.

Rotation 3: Samples collected from northwest and southeast of the Landfill (MS-08, MS-11, and MS-12) with in line Landfill samples located at MS-04 and MS-05.

Samples collected are analyzed for Total Organic Compounds (“TOC”) measured as methane, as well as for the LFG components listed in Table 1 of South Coast AQMD Rule 1150.1, which are found in **Table 1** below.

Table 1. South Coast AQMD Rule 1150.1 Toxic Air Contaminant List

SCAQMD Rule 1150.1 Table 1 Constituents			
Benzene	1,1-Dichloroethane	Tetrachloroethylene	Trichloromethane
Benzyl chloride	1,2-Dichloroethane	Tetrachloromethane	Vinyl Chloride
Chlorobenzene	1,1-Dichloroethene	Toluene	Xylene
1,2-Dibromoethane	Dichloromethane	1,1,1-Trichloroethane	
Dichlorobenzene	Hydrogen Sulfide	Trichloroethylene	

E-CAMP

The E-CAMP implemented additional time-integrated air monitoring, including volatile organic compounds (“VOCs”) and sulfur compounds, at the original off-site monitoring locations (MS-06 through MS-12). A listing of the 24-hour sampling locations is presented in **Table 2** below.

Table 2. Time-Integrated Sampling Matrix

Location/Sample Name	Sample Duration	24-Hour	1150.1
	Analytes	TO-15/307.91	TACs ¹
	Sample Schedule	Mon-Tue	Monthly
On-Site	Upwind		X
	Downwind		X
Off-Site	MS-06	X	
	MS-07	X	
	MS-08	X	
	MS-09	X	
	MS-10	X	
	MS-11	X	
	MS-12	X	

¹SCAQMD Rule 1150.1 Table 1 Compounds

Samples collected under the E-CAMP are analyzed for VOCs via EPA Method TO-15 and sulfur compounds via South Coast AQMD Method 307.91.

South Coast AQMD Stipulated Order

The Stipulated Order required the installation of two micro-GC units—one micro-GC at MS-10 (Hasley Canyon Park) and a second micro-GC at MS-12 (Val Verde Community) with the capability to detect any compound that was estimated to be emitted from the Landfill at a rate of greater than 1 ton per year, based on a flux chamber study conducted in October 2023. As of May 1, 2024, Chiquita’s

consultant has completed the installation of these micro-GCs. The micro-GCs selected are the MiTAP micro-GC manufactured by TricornTech, LLC.

The list of analytes and analyte detection limits for the micro-GCs pursuant to the Stipulated Order is provided in Table 3 below.

Table 3. South Coast AQMD Stipulated Order Micro-GC Analyte List

Analyte	Detection Limit (parts per million)
Acrolein	0.0005
2-Butanone	0.0008
Acetone	0.0001
Benzene	0.0001
Dimethyl Sulfide	0.0001
Ethanol	0.0005
Ethylbenzene	0.0001
Isopropyl Alcohol	0.0001
Isopropyltoluene	0.0001
m,p-Xylene	0.0001
Methanol	5
Propene	0.0001
Tetrahydrofuran	0.0005
Toluene	0.0001

Chiquita has also procured an additional micro-GC instrument package and two sensor modules for use as operational spares.

In addition to the air monitoring equipment, under Stipulated Order Condition 34, South Coast AQMD has access to real-time continuous PM_{2.5}, PM₁₀, and H₂S data from MS-01 through MS-12 and to data from the enhanced monitoring network. Chiquita's Air Monitoring webpage (<https://chiquitacanyon.com/reports/community-air-monitoring-program/>) provides weekly 24-hour time-integrated benzene results, continuous H₂S and methane data, and hourly micro-GC DMS and VOC data in graphical form, together with monitoring station locations, applicable reference exposure levels, downloadable historical data, and indicators for missing or affected data.

The Stipulated Order also requires automatic email and text message notifications for applicable benzene and H₂S exceedances. Chiquita investigates any measurement that triggers a notification, submits a preliminary investigation report to South Coast AQMD within one business day, and submits full documentation within four business days.

Beginning June 8, 2026, and every Monday thereafter, Condition 35(c) requires Chiquita to provide South Coast AQMD a weekly air monitoring network summary identifying instrument downtime; the cause, corrective action, and recurrence mitigation measures for downtime; weekly averages, standard deviations, and ranges for H₂S, methane, and speciated VOCs compared with the prior three months; and the public data portal status and data completeness for each instrument and site. These weekly summaries are posted on Chiquita's Odor Mitigation website.

Additional Air Monitoring

Chiquita has also installed additional air monitoring equipment at MS-01, MS-02, MS-03, MS-04, MS-06, MS-07, MS-08, MS-11, and MS-12, and SO₂ modules on the Aeroqual AQMs at MS-01 through MS-12.

Integrated Landfill Surface Sampling and Instantaneous Surface Emissions Monitoring

Under Conditions 9 and 10 of the Stipulated Order, Chiquita collects integrated landfill surface samples and conducts instantaneous surface emissions monitoring across the Reaction Mitigation Area at least three times per month, at intervals no more than once every seven days unless additional monitoring events are conducted. Across the remainder of the Landfill, integrated sampling and instantaneous monitoring are conducted at least four times per quarter in accordance with Rule 1150.1, Attachment A, Sections 2.0 and 3.0, respectively.

A reading of 500 ppmv TOC or greater during instantaneous surface monitoring, or 25 ppmv TOC or greater during integrated surface sampling, requires corrective action within two calendar days and follow-up monitoring or sampling within ten calendar days. If the follow-up event shows a second exceedance, Chiquita must install and operate a new or replacement well within 30 days of the initial exceedance, unless South Coast AQMD approves an extension.

Real-Time Monitoring for PM_{2.5}, PM₁₀, H₂S, CH₄, and SO₂

Under the CAMP and AMP, PM_{2.5}, PM₁₀, H₂S, CH₄, and SO₂ are continuously monitored at the fenceline/perimeter stations (MS-01 through MS-05) as well as in the community surrounding the Landfill (MS-06 through MS-12). Meteorological parameters are also monitored at each station. Data from these monitors are made available on Chiquita's Air Monitoring website.

Micro-GC Network

The current micro-GC network includes instruments at: MS-01, MS-02, MS-03, MS-04, MS-06, MS-07, MS-08, MS-10, MS-11, and MS-12. The network provides hourly monitoring for DMS and speciated VOCs, including acrolein.

A summary of the Landfill's continuous monitoring is provided in **Table 4** below.

Table 4. Landfill Continuous Monitoring Summary

Location/Analyte		H ₂ S	PM _{2.5}	PM ₁₀	VOCs ¹
On-Site	MS-01	X	X	X	X
	MS-02	X	X	X	X
	MS-03	X	X	X	X
	MS-04	X	X	X	X
	MS-05	X	X	X	
Off-Site	MS-06	X	X	X	X
	MS-07	X	X	X	X
	MS-08	X	X	X	X
	MS-09	X	X	X	
	MS-10	X	X	X	X
	MS-11	X	X	X	X
	MS-12	X	X	X	X

¹VOC analysis is accomplished via micro-GC.

A list of the continuous monitoring constituents is provided in **Table 5** below. Since the preparation of this table, DMS and speciated VOCs, including acrolein, have been added to the constituent list.

Table 5. AMP Continuous Monitoring Constituent List

Category	Analyte	CAS No.	Monitoring Unit	Detection Limit (parts per million)
Particulate Matter	PM _{2.5}	N/A	AQM	
	PM ₁₀	N/A		
Sulfur Compounds	H ₂ S	7783-06-4		0.003
	SO ₂	7446-09-5	Micro-GC	
	DMS	75-18-3		0.0001
VOCs	Acetone	67-64-1		0.0001
	Benzene	71-43-2		0.0001
	2-Butanone	78-93-3		0.0008
	Carbon Disulfide	75-15-0		0.0003
	Ethanol	64-17-5		0.0005
	Ethylbenzene	100-41-4		0.0001
	Hexane	110-54-3		0.0008
	Isopropyl Alcohol	67-63-0		0.0001
	Isopropyltoluene	99-87-6		0.0001
	Methanol	67-56-1		5
	Propene	115-07-1		0.0001
	Styrene	100-42-5		0.0001
	Tetrahydrofuran	109-99-9		0.0005
	Toluene	108-88-3		0.0001
	m,p-Xylene	1330-20-7		0.0001

Odor Surveillance Data

Under Conditions 1 and 2 of the Stipulated Order, Chiquita or a trained third-party contractor conducts community odor surveillance at 38 locations at least twice each operating day, once between 6:00 a.m. and 11:00 a.m. and once between 7:00 p.m. and 12:00 a.m. Surveillance may be suspended after a three-week period during which Chiquita receives no South Coast AQMD Rule 402 Notice of Violation and no single surveillance identifies odors above an intensity of 2 at more

than two locations. If surveillance has been suspended and Chiquita subsequently receives a Rule 402 Notice of Violation, surveillance must resume until the applicable three-week criteria are again satisfied.

The person conducting the surveillance may not have visited the Reaction Mitigation Area, working face, or other onsite areas where exposed trash, landfill gas, landfill liquids, or similar odors exist during the four hours before conducting the surveillance. At each surveillance location, the person makes the assessment while standing in ambient air outside a vehicle. Before the end of the workday, the surveillance results are recorded in an Odor Surveillance Log.

If chemical, leachate, landfill gas, or similar non-trash landfill odors with an intensity of 3 or greater are detected at three or more surveillance locations during a surveillance conducted during Landfill operating hours, the person conducting the surveillance immediately notifies designated Landfill operating personnel. Chiquita reviews and initiates appropriate modifications to fan placement and conducts a visual inspection of the Reaction Mitigation Area to identify and address cracks or other surface conditions, as needed. Qualifying trash-odor detections are communicated to designated operating personnel for implementation of applicable odor control measures and follow-up surveillance.

Chiquita maintains the Odor Surveillance Logs for the duration of the Stipulated Order, together with written records of notifications received and actions taken in response.

APPENDIX 4

Stipulated Order Condition 34(c)

The following is the full text of Stipulated Order Condition 34(c), which contains the requirements related to the automatic email and text message notifications for applicable benzene and H₂S exceedances described in the Community Notification Protocols section above.

Respondent shall, by April 30, 2024, retain a third party to develop and install a system that provides automatic electronic notification via email for any exceedance of the applicable 1-hour NAAQS, CAAQS, or acute 1-hour OEHHA REL, whichever is lower (both in time and concentration) based on a time weighted average for benzene and H₂S monitored in real-time by Respondent's monitoring network within the surrounding community (MS-06 through MS-12) by May 30, 2024. Additionally, by September 23, 2024, Respondent, through its retained contractor, shall develop and install a system allowing identical electronic notification via email for any exceedance of the applicable 1-hour NAAQS, CAAQS, or acute 1-hour OEHHA REL, whichever is lower (both in time and concentration) based on a time weighted average for benzene and H₂S monitored in real-time by Respondent's monitoring network surrounding the Landfill (MS-01 through MS-05). Such systems shall also provide an automatic electronic notification once the applicable time weighted average falls below the applicable REL. By December 31, 2025, the third party shall revise the system to provide an automatic electronic notification every hour during which the applicable time weighted average continues to be above the applicable REL. The template for all notifications shall be written in coordination with and approved by South Coast AQMD. Respondent shall be responsible for the third party including in such system a method for members of the public to sign up to receive such notifications without any personally identifying information (including email address) being disclosed to Respondent. Respondent shall be responsible for the third party putting into effect the notification system within three business days of direction from South Coast AQMD.

- i. By December 31, 2025, Respondent shall retain a third party to develop a system that allows for the electronic notifications defined in Condition 34(c) to be distributed via text message. Respondent shall be responsible for the third party including in such system a method for members of the public to sign up to receive such notifications without any personally identifying information (including phone numbers) being disclosed to Respondent. Respondent shall be responsible for the third party putting into effect the notification system within three business days of direction from South Coast AQMD.*