

February 16, 2024
File No. 01204123.21, Task 22

Subject: 30-Day Update on Air Monitoring Instrument Installation, Chiquita Canyon Landfill, Castaic, California

Pursuant to Condition 36 of the Modified Stipulated Order for Abatement (SOFA) issued to Chiquita Canyon, LLC (CCL) on January 17, 2024, this letter constitutes the 30-day update on the acquisition and installation of additional air monitoring instrumentation at the current air monitoring station (MS) locations MS-10 and MS-12. The update has been broken into two sections: instrument selection/acquisition, and ancillary components (e.g., power and permitting, etc.).

INSTRUMENT SELECTION/ACQUISITION

Per Condition 36, the instrumentation required for these locations must be capable of measuring hourly concentrations of benzene, toluene, ethylbenzene, and xylenes (BTEX), and other relevant volatile organic compounds (VOCs) with site surface emissions greater than 1 ton per year, as indicated in Table 5.5 of the CCL Assessment of Air Emissions from Landfill Surfaces Report (Air Emissions Report) dated October 2023. This includes the following compounds:

- Ethanol
- Acetone
- Tetrahydrofuran
- Benzene
- Methanol
- 2-Butanone
- Propylene
- 2-Propanol
- Isopropyltoluene
- Toluene
- Ethylbenzene
- m,p-Xylenes

In consultation with the South Coast Air Quality Management District, a micro gas chromatograph (micro-GC) from TricornTech was selected as the instrumentation to be installed. On January 17, 2024, SCS Engineers (SCS) initiated the acquisition of the MiTAP P320, an enclosed, micro-GC from TricornTech, with the capabilities to monitor for the compounds listed above. The unit will be contained in a stand-alone shelter designed for the micro-GC, but will require power, which is beyond the power supply capabilities (of the existing solar array used at MS-10 and MS-12 (refer to “Ancillary Components” discussion below).

Following configuration of the unit with TricornTech, the instrumentation was ordered on January 23, 2024, with an initial 70-90 day window for partial shipment (refer to the instrument quotation provided as **Attachment A**). TricornTech has informed SCS that it cannot make a complete shipment within the initial 70-90 day window. Additional assembly time is needed due to the inclusion of Methanol as an analyte. Since the micro-GC cannot detect methanol, a separate detector is being installed in the micro-station enclosure. This would have resulted in the partial shipment of the instrumentation in the range of April 2, 2024 to April 22, 2024. This would have been beyond the April 1, 2024 deadline of 75 days listed in Condition 36 of the SOFA.

SCS has been working with TricornTech and has expedited the instrumentation assembly and shipping dates to the following estimated timeline:

- Shipping from Taipei, Taiwan – March 25, 2024
- Customs Clearance Estimate – March 29, 2024
- Begin Installation – Week of April 1, 2024
- Complete Installation¹ – Week of April 8, 2024

Note that the proposed installation date, even with the expedited assembly and shipping, is past the 75-day allotted timeframe for completing installation of the micro-GCs, per Condition 36.

ANCILLARY COMPONENTS

The footprint of the micro-GC, including enclosure, will be able to fit within the existing footprint of MS-10 and MS-12. To our understanding, the footprint of the micro-GC will therefore not impact the land use agreements with Los Angeles County for MS-10, which is located on Los Angeles County Department Parks and Recreation (LADPR) property at Hasley Canyon Park, or for MS-12, which is located at the corner of Lincoln Avenue and Taylor Street in the community of Val Verde and is permitted for use by the Los Angeles County Flood Control District (LACFCD).

However, the existing solar arrays that were designed and permitted as a part of the original Community Air Monitoring Program (CAMP) for CCL will not be able to reliably provide continuous power for the new micro-GC enclosures at these two locations. The existing solar arrays were designed for the single air monitoring station that is installed permanently at these locations. Therefore, SCS initiated discussions with Los Angeles County Public Works (LACPW), LADPR, and LACFCD to receive approval of two alternate pathways for additional power: 1) upgrading existing solar capacity, and 2) providing temporary power to each location. An update on each of these pathways is provided below.

Upgrade of Solar Array Capacity –

SCS has determined it is possible to upgrade the solar panels and batteries that are contained in the MS-10 and MS-12 stations. The existing panels would be upgraded to a larger capacity panel, which was not available at the time of the original permitting and installation of MS-10 and MS-12, but has recently become available. The battery would be upgraded from lead-acid marine-grade batteries to lithium-ion batteries.

However, during initial discussions with electrical permitting personnel from LACPW, SCS was advised that a new permit would likely be required to upgrade the existing solar array in the event that the replacement was not “like-for-like.” SCS has initiated the design/permitting process for the solar upgrade, and has requested a meeting with LADPW, but it is not likely that the permitting will be completed prior to the 75-day deadline for instrument installation of April 1, 2024. Note that prior permitting efforts for the original CAMP solar array and stations took more than a year to complete.

Temporary Power Installation –

Concurrent with upgrading the solar power capacity on MS-10 and MS-12, SCS has reached out to temporary power companies to evaluate the possibility of installing temporary power at MS-10 and MS-12.

¹ Subject to power availability. Refer to “Ancillary Component” Discussion.

For MS-10, SCS has completed initial discussions with LADPR personnel on the temporary power installation. However, the agency requires a plan to be submitted for their review prior to approval. SCS is in process of drafting a plan to submit to LADPR for the temporary power installation at MS-10. We estimate one to two weeks for the submittal of this Plan to LADPR.

Since power in this area is all below-grade, there will be a significant effort required to bring power to the southeast corner of Hasley Canyon Park, the location of MS-10. To provide temporary power to MS-10, power poles will need to be installed along the southern border of Hasley Canyon Park, where it abuts Live Oak Elementary School. SCS will continue to pursue the possibility of LADPR's approval of the plan. However, LADPR has advised that it is unlikely that they will allow this installation. Even if LADPR were to approve the plan for temporary power installation at MS-10, it is not likely that the permitting will be completed prior to the 75-day deadline for instrument installation of April 1, 2024.

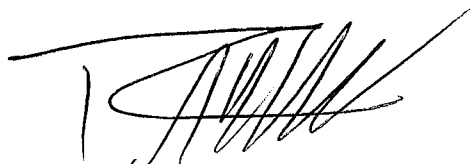
With regard to MS-12, located in Val Verde, there is both above-grade power and close proximity of power to MS-12's location. However, SCS's initial discussions with LACFCD have indicated that a new permit will be required in order to install temporary power at this location. SCS has initiated the design/permitting process for temporary power (reference FCDP2024000027, submitted on January 23, 2024), but has been told by LACFCD personnel that we need to restart the permit documentation process that was completed for the original MS-12 location. We are currently in discussions with LACFCD to evaluate the need for additional right-of-way and flood studies at this location, as it was recently completed for MS-12. A copy of the new permit checklist provided by LACFCD is provided in **Attachment B**.

Therefore, it is not likely that the permitting will be completed prior to the 75-day deadline for instrument installation of April 1, 2024. SCS was also told by the temporary power supply vendor, that since this location lacks a street address, Southern California Edison will not be able to provide a meter at the location, and that we would need to obtain a street address from Los Angeles County.

CLOSING

Based on the expedited equipment acquisition and installation timeline, as well as the permitting efforts that will be required for powering the selected instrumentation, SCS advises that CCL request a 60-day extension of the April 1, 2024 due date to have the micro-GCs installed and operational by June 1, 2024.

Sincerely,



Raymond H. Huff, R.E.P.A.
Vice President
SCS Engineers

Attachments

Attachment A
Micro-GC Order

Attachment B
LACFCD Permit Checklist



LOS ANGELES COUNTY PUBLIC WORKS
LAND DEVELOPMENT DIVISION
ENCROACHMENT PERMITS & INSPECTIONS

TO: SCS ENGINEERS
RAY HUFF
STIPE MARKOTIC
CHIQUITA CANYON LLC
STEVE CASSULO

DATE: 02/14/2024

Permit Tracking No: FCDP2024000027
Submittal Date: 01/23/2024
LACFCD Facility: San Martinez – Chiquita Canyon

SCREENING OF SUBMITTED DOCUMENTS FOR A PROPOSED WORK AFFECTING LOS ANGELES COUNTY FLOOD CONTROL DISTRICT (LACFCD) FACILITY AND/OR RIGHT-OF-WAY (ROW)

We have reviewed the submittal for the subject permit application and determined that additional documents are required before we start processing the request. Please submit all required item(s) listed below within 30 days of this request.

All documents uploaded to EPIC LA should be in PDF format, unless specified otherwise. **Please provide a response on how all these requests have been addressed (“noted”, “provided”, “N/A”, etc.)**

If we don’t hear from you within this time frame, your permit application will be considered incomplete and canceled. A new permit application submittal will be required to continue with your permit process.

ENCROACHMENT

- Permit fee will be assessed once the required documents are submitted.
- The proposed work is within LACFCD’s fee-owned property. In addition to the permit, you will also need to obtain property rights to maintain the improvements. The provided Rental Agreement only covers the monitoring station permitted with FCDP2020000476. You can reach out to SMP to ask if the rental agreement could be amended to accommodate the additional proposed work.
- Provide **Right of way Maps of the existing LACFCD facility**: Indicate the location of the proposed work. The maps can be found at <http://egisgcx.isd.lacounty.gov/dpw/m/?viewer=rweflood>
- The submitted plans show improvements within LACFCD’s Right-of-way for (1) air monitoring station that was previously permitted with Permit FCDP2020000476.

Please submit all plans associated with the installation of temporary power.

- How is the power being provide?
- Is it self-sufficient?

- ~~EPD has informed me that you are proposing 2 additional air monitoring stations. If so, please provide plans for the new stations as well.~~

- ☒ Submit all plan sheets associated with this project (grading, structural, civil, architectural, planting, irrigation, etc.) and:
 - Show a vicinity map.
 - Include the “North” arrow, scale(s) used, and elevations on the plan and profile view(s).
 - Show all existing facilities in dashed line.
 - Show all proposed facilities in solid lines.
 - Include all applicable notes – construction, contractor, general
 - Show the dimensioned property and right-of-way lines. Label the LACFCD’s right-of-way lines as either fee or easement, street names, City/County boundary.
 - Show and label LACFCD R/W (easement or fee)
 - Show and label City/LA County Boundary (if applicable)
 - Include a detail of the proposed improvements within LACFCD’S R/W (dimensions, sections and legends clearly defined)
- ☒ Plan sheets should be wet stamped and signed by a professional Civil/Structural Engineer licensed to practice in California.
- ☒ The following must be provided prior to LACFCD permit issuance or prior to starting work within the District’s right of way:
 - A certificate of insurance meeting the District’s minimum insured and coverage requirements and listing the Los Angeles County Flood Control District and the County of Los Angeles as additional insured. A sample the certificate of insurance requirements can be found at: <https://dpw.lacounty.gov/SPATS/public/spatsfaq/forms/InsuranceRequirements.pdf>
 - The license information of the contractor exercising the permitted work.