

March 15, 2024
File No. 01204123.21, Task 22

Ms. Kathryn Roberts
Ms. Mary Reichert
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, California 91765

Subject: 60-Day Update on Air Monitoring Instrument Installation, Chiquita Canyon Landfill, Castaic, California

Dear Ms. Roberts and Ms. Reichert:

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 60-day update on the acquisition and installation of additional air monitoring instrumentation at the MS-10 and MS-12 air monitoring station (MS) locations. The update has been broken into two sections: instrument selection/acquisition, and ancillary components (e.g., power and permitting, etc.).

On February 20, 2024, South Coast AQMD granted CCL's request for an extension of the installation deadline, providing a new deadline under Condition 36 of May 1, 2024.

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 compounds listed in **Table 1**, below.

Table 1. SCAQMD Proposed Analytes

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

In consultation with the South Coast Air Quality Management District (SCAQMD), a micro gas chromatograph (micro-GC) from TricornTech was selected as the instrumentation to be installed. The proposed delivery schedule, as discussed in more detail in the 30-day update, is presented below:

- Shipping from Taipei, Taiwan – March 25, 2024
- Customs Clearance Estimate – March 29, 2024
- Installation – Week of April 1, 2024
- Units online¹ – Week of April 15, 2024

As of the date of this letter, the schedule presented above is unchanged. The equipment is still slated to be delivered during the week of March 25th, and available for installation the week of April 1, 2024.

As you are aware, on February 21, 2024, CCL received a Unilateral Administrative Order (UAO) from the United States Environmental Protection Agency (EPA). As a component of the UAO, the EPA has requested the installation of instrumentation at MS-10 and MS-12, in addition to five other locations, that will analyze for the components listed in **Table 1**, as well as the additional analytes listed in **Table 2**, below.

Table 2. USEPA Proposed Additional Analytes

Benzyl Chloride	1,2-Dichloroethane	Trichloroethylene
Chlorobenzene	1,1-Dichloroethene	1,1,1-Trichloroethane
1,2-Dibromomethane	Methylene Chloride	Vinyl Chloride
Dichlorobenzene	Tetrachloroethylene	
1,1-Dichloroethane	Carbon Tetrachloride	

In consultation with the SCAQMD, during a meeting with the micro-GC vendor on March 8, 2024, we were told that the addition of the **Table 2** compounds to the existing ordered equipment would extend the delivery timeline. SCS discussed this issue with CCL and it was determined that the existing micro-GCs that have already been ordered would be completed, as requested, and that the instruments will be upgraded at a future timeframe, concurrent with the installation of the five additional micro-GCs.

Therefore, as of the date of this letter, it is expected that the installation of the instrumentation required by Condition 36 will meet the new deadline of May 1, 2024.

ANCILLARY COMPONENTS

As stated previously, 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.

¹ Assumes that proposed power option of temporary battery power is successful (refer to Temporary Battery Power section).

Therefore, SCS initiated discussions with Los Angeles County Public Works (LACPW), LADPR, and LACFCD to receive approval of three alternate pathways for additional power: 1) upgrading existing solar capacity, 2) providing temporary power to each location, and 3) alternate location for MS-10 additional monitoring. SCS is currently pursuing all three pathways; 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.”

As stated in our February update, SCS has initiated the design/permitting process for the solar upgrade, and the design of the requested electrical permitting documentation is in process, with an expected submittal date of mid-April 2024. Note that prior permitting efforts for the original CAMP solar array and stations took more than a year to complete.

Temporary Power Installation –

Since the prior update, SCS has modified its temporary power approach into two separate pathways: temporary construction power and temporary battery power. Details on each of these approaches is provided below.

Temporary Construction Power

Under the construction power option, SCS is pursuing the permitting for installation of a temporary power drop to the locations for MS-10 and MS-12. Within LA County, we have been told that construction power requires permitting from LADPW.

MS-10

For MS-10, in addition to the permitting documentation, LADPR requires a plan to be submitted for their review prior to submittal to LADPW for permitting. SCS has engaged a subcontractor who is in process of drafting a plan to submit to LADPR for the temporary power installation at MS-10. We anticipate submittal of a plan by the end of March 2024.

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 revised deadline for instrument

installation of May 1, 2024. However, an expedited timeframe of one month (i.e., June 1, 2024) would be anticipated, subject to LA County's approval to expedite permitting and permit revisions.

MS-12

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), 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 these studies were recently completed for MS-12.

Therefore, it is not likely that the permitting will be completed prior to the deadline for instrument installation of May 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. SCS is currently communicating with Los Angeles County regarding this issue.

Temporary Battery Power

Temporary battery power is the only viable option we see that will potentially get close to meeting the deadline. Under the battery power option, SCS would provide temporary power to MS-10 and MS-12 via a bank of rechargeable batteries that would power the new micro-GC while SCS continues to pursue both temporary and permanent power for both locations.

At each location, SCS would provide a customized battery trailer that would fit within the existing enclosures and would be able to power the new micro-GCs at each location. It is anticipated that SCS personnel would periodically recharge/replace the batteries deployed under this option.

We are working with the vendor to ensure that the temporary power via battery can be deployed during the week of April 1, 2024, to allow for the field deployment of the micro-GCs discussed above. Temporary power via battery, deployed during the week of April 1, 2024, may allow SCS to meet the May 1, 2024 deadline. However, this is dependent on the vendor being able to provide battery power on a fast enough timeline, and the batteries proving reliable to provide adequate power. There will also likely be time needed to determine a maintenance and cadence for such batteries to ensure continuous monitoring. We therefore advise requesting an additional 30-days beyond the May 1, 2024 deadline given the uncertainties with this method of providing power.

CLOSING

SCS is working to have the micro-GCs installed and operational by May 1, 2024. Based on permitting and logistical issues explained above, temporary power via battery is the only pathway that may enable SCS to meet the May 1, 2024 deadline. Should any delay occur with the deployment of the temporary battery power, or if there are issues with that mode of providing power itself, operation of the micro-GCs will be delayed. We therefore advise requesting an additional 30 days beyond the May 1, 2024 deadline to ensure adequate time for deployment of this novel method of powering the monitoring devices. Should South Coast AQMD believe that further information is warranted to justify

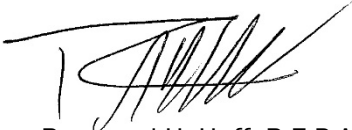
South Coast Air Quality Management District

March 15, 2024

Page 5

granting this request, particularly with respect to the battery power option, we will be able to provide such information once battery power is able to be tested on such devices.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Huff', with a long horizontal stroke extending to the left.

Raymond H. Huff, R.E.P.A.

Vice President

SCS Engineers