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March 20, 2024

**Via Email Correspondence**

Mr. Steve Cassulo  
[Steven.cassulo@WasteConnections.com](mailto:Steven.cassulo@WasteConnections.com)  
District Manager  
Chiquita Canyon Landfill  
29201 Henry Mayo Drive  
Castaic, CA 91384

**SUBJECT: CHIQUITA CANYON LANDFILL (SWIS No. 19-AA-0052) – LEA Response to the updates and revised schedule proposed for Mitigation Measures #1B and #2A**

Dear Mr. Cassulo,

On March 4, 2024, the Los Angeles County Department of Public Health, Solid Waste Management Program, acting as the Local Enforcement Agency (LEA), received a letter with updates to Mitigation Measures #1B and #2A (Letter) for Chiquita Canyon Landfill (CCL), prepared by SCS Engineers and Tetra Tech, as requested by the LEA letter dated February 26, 2024. The Letter also included updated timelines and extension requests for both Mitigation Measures.

According to the Letter, rain events and equipment failure have delayed the installation of 20 temperature monitoring probes (Mitigation Measure #1B) by the due date of February 29, 2024. The proposed new deadline for the installation of all temperature monitoring probes is April 4, 2024.

The Letter also states that rain events and wet conditions created unsafe working conditions and resulted in a delay of the installation of the geosynthetic cover (Mitigation Measure #2A). In addition, the reaction area acreage requiring cover expanded from 23.9 acres to 30 acres which requires additional time for land preparation and cover installation. As a result, the Letter proposed to extend the timeline to complete the installation of the geosynthetic cover from March 25, 2024 to April 26, 2024. The final report for the cover installation is to be submitted by May 3, 2024.

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The LEA has reviewed the Letter and determined that your revised schedules and requests for time extension are adequate. CCL shall continue to provide weekly updates on the progress of Mitigation Measures #1B and #2A that include any delays due to rain events or other special occurrence that may affect the new schedules.

If you have any questions, please contact me at (626) 430-5550.

Sincerely,



Karen Gork, Chief EHS  
Solid Waste Management Program  
Local Enforcement Agency (LEA)

Enclosure

Cc: (Via Electronic Correspondence Only)

- Robert Ragland, Los Angeles County Department of Public Health
- Liza Frias, Los Angeles County Department of Public Health
- Nichole Quick, M.D., Los Angeles County Department of Public Health
- Shikari Nakagawa-Ota, Los Angeles County Department of Public Health
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- Thanne Berg, United States Environmental Protection Agency ([Berg.Thanne@epa.gov](mailto:Berg.Thanne@epa.gov))

March 4, 2024

Mr. Steve Cassulo  
Chiquita Canyon Landfill  
29201 Henry Mayo Drive  
Castaic, CA 91384

**Subject:** Response to the LEA Letter Regarding Updates to Mitigation Measures #1B and #2A  
Chiquita Canyon Landfill, Castaic, California

Dear Mr. Cassulo,

On behalf of Chiquita Canyon, LLC (Chiquita), SCS Engineers and Tetra Tech hereby submit this letter to provide additional information to the Los Angeles County Department of Public Health, Solid Waste Management Program, acting as the Local Enforcement Agency (LEA), respond to the LEA's letter dated February 26, 2024 regarding Mitigation Measures #1B and #2A, and request an extension to the installation timelines for both #1B and #2A until April 4<sup>th</sup> and May 3<sup>rd</sup> respectively.

On December 19, 2023, and in subsequent communications on December 20, 2023, and January 23, 2024, Chiquita submitted a workplan to the LEA. The workplan included a geosynthetic cover installation schedule and details regarding the installation of the geosynthetic cover and temperature monitoring probes (probes) in the area of the Chiquita Canyon Landfill (Landfill) affected by the landfill reaction (reaction area). The LEA issued a conditional approval letter on January 29, 2024.

*Installation of Temperature Monitoring Probes – Mitigation Measure #1B:*

The original workplan and installation schedule approved by the LEA stated that, without any delays due to weather conditions or related safety concerns, the installation of the probes was to be completed by February 29, 2024. With heavier than usual rains hitting the Landfill on a consistent basis over the past month, the site soils are saturated and too slippery to allow the safe use of heavy equipment without endangering the safety of the construction crews on-site. Because of the delays caused by the rains, the original drilling schedule could not be met.

Chiquita's temperature monitoring probe installation plan includes drilling 20 probes. Chiquita has paused the drilling of any new landfill gas wells to utilize all three available drill rigs for probe installation to meet the LEA's expediated request. Five probes have been drilled. The drilling of probes TP-1, TP-2, TP-3, TP-6, and TP-17 was completed by February 28, 2024. Due to the challenging drilling conditions close to the reaction area, probes TP-9 and TP-16 will be drilled last to allow the reaction area to continue to dewater.

An updated estimated schedule for the progress of probe installations under Mitigation Measure #1B was requested by the LEA, and is set forth below. The estimated dates of completion are weather-permitting. These dates are estimates and may need to be further modified depending upon

factors like weather, soil conditions, and related safety concerns that may change in upcoming weeks. One drill rig is currently broken and undergoing repairs, which are estimated to take one to two weeks. However, even with the broken drill rig, with good conditions, we estimate that drilling of all probes will be complete in approximately three weeks (by March 21). Rain is forecasted again this weekend and next week. Depending on the amount of rainfall the site receives, delays to drilling are likely to continue to impact the below schedule.

Week	Dates	Estimated Efforts and Goals re: Mitigation Measure #1B
Week 1	March 1 – March 7	Continue drilling probes (approximately 50% complete by the end of the week)
Week 2	March 8 – March 14	Continue drilling probes (approximately 75% complete by the end of the week)
Week 3	March 15 – March 21	Complete drilling of all probes and order all deeper depth thermocouples at the actual depths achieved during drilling
Week 4	March 22 – March 28	All deeper depth thermocouples delivered and begin installation of deeper depth thermocouples (approximately 75% complete by the end of the week)
Week 5	March 29 – April 4	All deeper depth thermocouples installed and installation of Remote Monitoring System for probes

Chiquita will work to minimize risk caused by weather and ensure the safety of the probe drilling and construction crews. If the Landfill conditions continue to be favorable, Chiquita will work to complete the activities in the schedule above as soon as possible. Chiquita has redirected all three drill rigs on site to drill temperature probes in order to expedite the process. There are no other drill rigs that are immediately available to add to the site that could handle this type of deep drilling.

*Installation of Geosynthetic Cover – Mitigation Measure #2A:*

The original acreage of the geosynthetic cover was 23.9 acres. The area has been expanded to approximately 30 acres based on site conditions. The additional area will require approximately two additional weeks of construction. The following updated schedule for the progress of geosynthetic cover installation under Mitigation Measure #2A is based on clear working conditions; heavy rain, wet conditions, high winds, and safety precautions related to the weather conditions may extend construction. With rain forecasted again this weekend and next week delays to drilling are likely to continue to impact the below schedule depending on the amount of rainfall the site receives.

Week	Dates	Estimated Efforts and Goals re: Mitigation Measure #2A
Current Week	February 26 – March 1	Installation of approximately 2 additional acres of geosynthetic cover on the west slope
Weeks 2–4	March 4 – 22	Installation of secondary toe drain and approximately 2 additional acres of geosynthetic cover over temporary scrim at the toe of the west slope

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Weeks 3-5	March 18 - April 5	Complete geosynthetic cover on the west slope, approximately 15 additional acres of geosynthetic cover
Weeks 6-7	April 8 - 19	Complete top deck, approximately 8.2 additional acres of geosynthetic cover
Week 8	April 22 - 26	Complete north slope wells, approximately 7,500 square feet of geosynthetic cover
Week 9	April 29 - May 3	Finalize reporting

Resources dedicated to the installation of the geosynthetic cover include an earthwork contractor, liner installer, safety monitor, and Construction Quality Assurance Monitor. The crew sizes and equipment used change depending on the task, access, location of work, and timing. On average the earthwork contractor has a crew of twelve people which includes the foreman, laborers, and operators. Equipment includes one large excavator used to load out rock trucks from the borrow pit, four rock trucks that transport material from the borrow pit to the capping area, three dozers to grade benches and slopes, one roller to prepare subgrade, one backhoe to excavate liner trenches, one mini excavator, and one water truck for dust control and moisture conditioning fill material. A typical liner crew consists of twelve people which includes the foreman, quality assurance monitor, laborers, and operators. Equipment includes a telehandler for liner deployment, and wedge and extrusion welders for seaming the liner. First, the earthwork contractor works in front of the liner installer to grade, prepare the subgrade, and excavate liner trenches. Then the liner installer follows behind and installs the geosynthetic cover. The area prepared at one time is limited to what can be covered prior to the next rain event.

If you have any questions regarding the information contained in this submittal, please contact the undersigned.

Sincerely,



Bill Haley, P.E.  
Project Director  
(858) 524-9525  
**SCS ENGINEERS**



Julie Hauenstein, P.E.  
Project Manager  
(909) 835-8167  
**Tetra Tech**

cc:

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