



REGION 9

SAN FRANCISCO, CA 94105

June 13, 2024

Mr. Steve Cassulo
District Manager
Chiquita Canyon, LLC
29201 Henry Mayo Drive
Castaic, CA 91384-2705

Dear Mr. Cassulo:

On March 27, 2024, the U.S. Environmental Protection Agency (“EPA”) received the Slope Stability Analysis Work Plan (the “Plan”), submitted as Attachment E to the Master Work Plan submitted by Chiquita Canyon, LLC (“CCL”) pursuant to that certain Unilateral Administrative Order, EPA Docket No. RCRA 7003-09-2024-0001 and CERCLA 106-09-2024-05, In the Matter of Chiquita Canyon, LLC, issued February 21, 2024 (the “UAO”). The Plan was prepared to address the slope stability work plan requirement in the November 21, 2023, letter from the Los Angeles County Department of Public Health, Solid Waste Management Program, acting as the Los Angeles County Local Enforcement Agency (“LEA”) to CCL.

EPA acknowledges that CCL submitted a Slope Stability Analysis Workplan to the LEA on December 14, 2023 (the “December 2023 Slope Stability Analysis Plan”); and on December 20, 2023, the LEA issued a letter accepting the December 2023 Slope Stability Analysis Plan with conditions (the “LEA Acceptance Letter”).

On March 27, 2024, CCL submitted a copy of the December 2023 Slope Stability Analysis Plan as the Plan under the UAO.

EPA has reviewed the Plan and the LEA Acceptance Letter; and, in accordance with Paragraph 31 of the UAO, approves the Plan as a binding Work Plan under Paragraph 22 of the UAO. Therefore, CCL shall proceed with implementing the requirements of the Plan, including the schedule and provisions of the Plan, notwithstanding EPA’s ongoing review of the other Work Plans.

EPA further acknowledges that on February 22, 2024, CCL provided a Slope Stability Analysis Report (the “Slope Stability Analysis”), prepared in accordance with the December 2023 Slope Stability Analysis Plan, to LEA. On March 22, 2024, LEA provided a letter to CCL requiring CCL to perform additional analyses under the Slope Stability Analysis. On May 7, 2024, CCL provided an updated draft of the Slope Stability Analysis to LEA (the “Revised Slope Stability Analysis”). According to the

Compliance Order, In the Matter of Chiquita Canyon Sanitary Landfill, issued on June 6, 2024, by LEA to CCL, the Revised Slope Stability Analysis is under review by LEA. EPA retains the right, pursuant to Section XXIV of the UAO, to require additional work, including, but not limited to, work related to the Revised Slope Stability Analysis.

If you have any questions or comments regarding this letter, please contact Laura Friedli, EPA Attorney Advisor, at (415) 972-3325 or Friedli.Laura@epa.gov.

Sincerely,

Tyler Holybee
EPA Project Coordinator

Enclosures

cc: John Perkey, Waste Connections
Jim Little, Waste Connections
Kurt Shaner, Waste Connections
Sarah Phillips, Waste Connections
Megan Morgan, Beverage & Diamond
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