



LOS ANGELES COUNTY DEPARTMENT OF PUBLIC HEALTH
 SOLID WASTE MANAGEMENT PROGRAM
 ACTING AS THE LOCAL ENFORCEMENT AGENCY (LEA)
 5050 COMMERCE DRIVE, BALDWIN PARK, CA 91706

IN THE MATTER OF:

CHIQUITA CANYON SANITARY LANDFILL

29201 HENRY MAYO DRIVE
 CASTAIC, CA 91384
 APN: 3271-002-011, 3271-002-013, 3271-002-019,
 3271-002-036, 3271-002-039, 3271-005-034
 SWIS# 19-AA-0052

OWNER/OPERATOR

CHIQUITA CANYON, LLC (RESPONDENT)

29201 HENRY MAYO DRIVE
 CASTAIC, CA 91384

BY CERTIFIED MAIL AND ELECTRONIC COPY

CERTIFIED MAIL: 91 7199 9991 7037 9753 6218

COMPLIANCE ORDER

PUBLIC RESOURCES CODE SECTIONS
 43209, 44106, 45000, 45005, 45011, 45014,
 45017, 45023; TITLE 27 OF THE CALIFORNIA
 CODE OF REGULATIONS (27 CCR),
 SECTIONS, 20750, AND 20921; AND TITLE 14
 OF THE CALIFORNIA CODE OF
 REGULATIONS (14 CCR), SECTIONS 18304
 AND 18304.1, 18304.3, 18365

DATE: June 6, 2024

TO: CHIQUITA CANYON, LLC

YOU ARE HEREBY ORDERED TO:

**TAKE ALL ACTIONS AND ABIDE BY ALL OTHER ORDERS CONTAINED HEREIN
 AT THE CHIQUITA CANYON LANDFILL EFFECTIVE IMMEDIATELY.**

1.0 PLEASE TAKE NOTICE:

1.1 The Los Angeles County Department of Public Health, Solid Waste Management Program, acting as the Local Enforcement Agency (LEA), is authorized by Division 30 of the



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Public Resources Code (PRC), §§ 43209 and 45000, and Title 14 of the California Code of Regulations (14 CCR), to enforce applicable solid waste regulations within the County of Los Angeles; and,

1.2 Division 30 Part 5 of the PRC and 14 CCR §§ 18304 and 18304.1 authorize the LEA to issue enforcement orders for violations of the PRC and regulations adopted pursuant to Division 30 of the PRC; and

1.3 Chiquita Canyon Sanitary Landfill (Site) is a permitted sanitary landfill located on parcel APNs 3271-002-011, -013, -019, -036, -039, and 3271-005-034 with an address of 29201 Henry Mayo Drive, Castaic, California, 91384, in the County of Los Angeles, and identified by Solid Waste Information System (SWIS) No. 19-AA-0052; and

1.4 Respondent, Chiquita Canyon, LLC, (CCL), is the operator and Responsible Party (RP) for noncompliance with state minimum standards. Specifically, 27 CCR, Sections 20921 and 20750 have been noted monthly on LEA inspection reports to date beginning September 1, 2023, and November 28, 2023, respectively, and are described in the paragraphs below.

2.0 STATEMENT OF FACTS PERTAINING TO 27 CCR SECTION 20750:

2.1 On August 10, 2023, the LEA requested the California Department of Resources, Recycling and Recovery (CalRecycle) to provide technical expertise and assistance in determining root cause and mitigation strategies for multiple issues identified at the Site by the LEA and other regulatory agencies, such as elevated well temperatures, increased landfill gas (LFG) emissions (odor), and unusual landfill settlement.¹

¹ CalRecycle provides comments to the LEA as assistance to support the program carrying out its responsibilities on permitted disposal sites. The final determination as to the comments provided to the responsible party is within the sole purview of the LEA, acting within the parameters of its discretion, in accordance with its vested authority under its certification as defined in 14 CCR, Division 7, 27 CCR, Division 2, Subdivision 1 (Section 20005 et seq.), and Division 30 of the PRC.



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2.2 CalRecycle issued a letter dated October 16, 2023 (October 16, 2023 CalRecycle Letter) to the LEA containing its review of the conditions that are causing the issues at the Site. CalRecycle conducted a comprehensive review of 18 months of Site records, and LFG data in the impacted area and around the general vicinity of the impacted area. The review focused on the Site's carbon monoxide concentrations, recent LFG temperatures, LFG control system operation, and other operational factors. The review determined that the Site sustained conditions over the past 18 months that include, but are not limited, to:

- Cover integrity issues;
- Increased temperatures and pressures in the LFG control systems and waste mass;
- Unusual landfill settlement;
- A heating/smoldering event that is expanding in size and intensity.

2.3 CalRecycle concluded that "conditions at CCL are causing additional pressure, odors, elevated leachate temperatures, and damage to the gas extraction system." To reduce the odors and better define the reaction, CalRecycle recommended 15 mitigation actions as part of the review.

2.4 On October 17, 2023, the LEA issued a letter (October 17, 2023 LEA Letter) requesting that CCL provide a written response and timeline to address the recent conditions sustained by CCL in the prior 18 months and the 15 recommended corrective and mitigation actions from the October 16, 2023 CalRecycle Letter by October 20, 2023.

2.5 CCL responded on October 20, 2023 (October 20, 2023 CCL Response) as instructed by the LEA. CCL addressed the 15 recommended mitigation actions, many of which according to CCL, were included in the South Coast Air Quality Management District's (SCAQMD) Stipulated Order for Abatement (SOFA).

2.6 The LEA requested CalRecycle's technical review of the October 20, 2023 CCL Response. As part of the review, CalRecycle visited the Site on November 2, 2023. Staff from the LEA, SCAQMD, Los Angeles Regional Water Quality Control Board (LARWQCB), Department of Toxic Substances Control (DTSC), and the United States Environmental Protection Agency (USEPA) toured the Site with CCL staff.



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2.7 On November 14, 2023, CalRecycle issued a letter (November 14, 2023 CalRecycle Letter) to the LEA based on the November 2, 2023 Site visit and the additional information provided in the October 20, 2023 CCL Response. CalRecycle's letter provided a cause analysis, comments to CCL's response to recommended mitigation actions (2, 8, 9 and 13) and further recommendations. Regarding recommended mitigation action 2, CalRecycle concluded that the current intermediate cover should not be viewed as adequate to minimize odors.

2.8 On November 21, 2023, the LEA issued a letter (November 21, 2023 LEA Letter) requiring that CCL perform four mitigation measures (Mitigation Measure 1A, 1B, 2A, 2B, 3 and 4) recommended in the November 14, 2023 CalRecycle Letter and October 16, 2023 CalRecycle Letter. The LEA directed that CCL provide a written response by Wednesday, December 6, 2023, and submit the required plan, data, and report by the due dates indicated in the letter.

2.9 The four mitigation measures listed in the November 21, 2023 LEA Letter that are required to correct the violation of 27 CCR § 20750 are described below.

Mitigation Measure 1 A & 1B – Soil Reaction Break/Barrier

2.10 CCL must provide a plan to construct a soil reaction break/barrier at a predesignated area(s) if the reaction reaches a determined action line. The plan is due to the LEA for approval no later than two weeks after installing temperature monitoring devices.

A. Develop a soil reaction break/barrier plan and propose a set of criteria that would require CCL to install a soil reaction break/barrier between the reaction and operational areas of the landfill. (Mitigation Measure 1A)

B. To obtain necessary data to determine the action line, CCL needs to collect data regarding intensity, depth, speed and direction of the reaction. It is imperative that CCL installs temperature monitoring devices by January 8, 2024. (Mitigation Measure 1B)

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Mitigation Measure 2 A & 2B - Cover

2.11 Because of the ongoing reaction, the cover that is currently in place is not adequate and not performing to the standards to maintain the site in reasonable repair.

A. Place and compact a minimum cover of 24 inches of 1×10^{-6} low permeability soil in and around the reaction settlement area and any well showing signs of a reaction by December 14, 2023. (Mitigation Measure 2A)

B. Develop a written plan that includes documentation and tracking of the fissures, settlement and tension cracks in the soil cover for LEA review and approval by December 6, 2023. The written plan needs to include a photo log of the fissure location including length and severity. Upon LEA approval, CCL must submit a weekly report to the LEA by each Tuesday. (Mitigation Measure 2B)

Mitigation Measure 3 - Slope Stability Analysis

2.12 Given the prior slope instability on the western slope near the leachate outbreak, CCL shall perform a slope stability analysis in the same area for LEA review, as saturated waste has very low shear strength. Submit a workplan with a timeline for LEA review and approval by December 14, 2023.

Mitigation Measure 4 – Manufacturer Maximum Design Specifications

2.13 CCL needs to collect temperatures in and around the reaction area to meet the manufacturer's temperature design specification/recommendations to ensure that the French drain does not fail due to elevated temperature of the leachate soon after installation, leaving leachate seepage without control at the site. This additional step is necessary because of the ongoing reaction and to ensure that the public does not come into contact with leachate.

2.14 On November 28, 2023, the LEA conducted a periodic inspection that noted a violation of 27 CCR § 20750-Site Maintenance and referred to the November 21, 2023 LEA Letter's four mitigation measures as a means to assist with correcting the violation. The LEA periodic inspection reports dated November 28, December 19, 2023, January 17, February 7,



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March 26, and April 30, 2024 have also noted the violation of 27 CCR § 20750. The violation noted on the report is described below.

Pursuant to 27 CCR § 20750, the operator shall implement a preventative maintenance program to monitor and promptly repair or correct defective conditions with respect to requirements of the CIWMB [California Integrated Waste Management Board, currently CalRecycle] standards, and conditions established by the EA [Enforcement Agency (LEA)]. All other aspects of the disposal site shall be kept in a state of reasonable repair.

Due to leachate outbreaks and stability issues with leachate saturated slope and waste, the issues with high temperatures, LFG collection, excessive leachate production, and unusual and large-scale settlement, the LEA required CCL to complete the following actions listed in the November 21, 2023 LEA Letter, as recommended by CalRecycle after the site inspection on November 2, 2023 and records review.

CCL's compliance status pertaining to 27 CCR § 20750 is subcategorized by mitigation measure and discussed below.

Mitigation Measure 1 A – Soil Reaction Break/Barrier Plan

2.15 On December 6, 2023, the LEA received a letter from CCL (December 6, 2023 CCL Response) in response to the November 21, 2023 LEA Letter. CCL responded to Mitigation Measure 1A by stating they would prepare a soil reaction break/barrier plan and propose a set of criteria that would require CCL to install the break/barrier by the LEA-provided deadline. CCL also stated that it does not believe that such a break/barrier is necessary or feasible, however, CCL did not provide any data to support CCL's belief.

2.16 On April 5, 2024, the LEA issued a letter to CCL (April 5, 2024 LEA Letter) stating the TMP and LFG collection well data, specifically carbon monoxide (CO) and hydrogen (H₂) are imperative for determining an action line, in which, if the reaction reaches a predesignated criteria then it would trigger implementation of an approved Soil Reaction



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Break/Barrier Plan. Directives 1 and 2 pertain to the installation of Mitigation Measure 1B and are discussed in the corresponding section. Directives 3 through 6 apply to the Soil Reaction Break/Barrier Plan (Mitigation Measure 1A) and are described below.

Directive 3: Provide waste photographs, boring logs and temperature logs to the LEA by April 12, 2024, for all LFG collection wells installed since June 2023.

Directive 4: Submit LFG data for all gas collection wells in the reaction area and wells 200 feet outside of the reaction area to the LEA by April 12, 2024.

Directive 5: Submit CO and H₂ readings for all gas collection wells in the reaction area and wells 200 feet outside of the reaction area to establish a baseline using Method ASTM D1946 in summa cans by May 6, 2024.

Directive 6: Submit monthly CO and H₂ data from a set of gas wells selected by the LEA after the baseline sampling is completed and recorded on a site map. Submit the lab data for all LFG data. Once a set of wells are selected, monthly LFG data shall be collected and submitted to the LEA, including a discussion of the LFG data and graphic showing CO and H₂ trends over time.

2.17 The April 5, 2024 LEA Letter provided a new deadline to submit the Soil Reaction Break/Barrier Plan, at least 10 days after gathering all the necessary data, rather than two weeks after the installation of the TMPs as per the November 21, 2023 LEA Letter. Lastly, the letter also stated that as an alternative option, CCL may submit a study to the LEA to assure the reaction is no longer a concern to public health, safety and the environment, if CCL chose to do so.

2.18 On April 12, 2024, the LEA received a response from CCL (April 12, 2024 CCL Response) to Directive 3 and 4 of the April 5, 2024 LEA Letter, and a Soil Reaction Break/Barrier Plan dated March 27, 2024 (March 27, 2024 Plan). The April 12, 2024 CCL Response is pending LEA review.

2.19 The LEA determined that the March 27, 2024 Plan was deficient and did not adequately address Mitigation Measure 1A requirements as described in the November 21, 2023 LEA Letter and the April 5, 2023 LEA Letter, and it was therefore rejected by the LEA in a



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letter dated May 3, 2024 (May 3, 2024 LEA Letter).

2.20 Prior to issuance of the May 3, 2024 LEA Letter, the LEA held a virtual meeting with CCL and CalRecycle on April 23, 2024, to discuss the need for a revised plan from CCL to adequately address the construction of a soil reaction break/barrier. The *CCL Barrier Discussion* presentation and *Isolation Break Criteria Example* document presented by CalRecycle at the meeting were provided to CCL via email on the same day.

2.21 As per the May 3, 2024 LEA Letter, CCL is required to submit a revised Soil Reaction Break/Barrier Plan to the LEA for review and approval within 10 days after gathering necessary data from the TMPs and LFG collection wells (refer to the April 5, 2024 LEA Letter). The data from the TMPs and LFG collection wells should be used to draft the revised plan and address the following:

1. Installation of an air/soil break that separates the waste with either an inert material or air.

2. Investigate how each cell or phase was constructed and examine if soil breaks between cells/phases can be exploited. The investigation should include a review of where haul roads were constructed to determine if the inert roads can also be used as fuel breaks. Information from the investigation should be used to develop where containment breaks should be placed.

3. Propose a set of criteria for the primary and secondary engagement lines and the type of reaction breaks/barriers and/or mitigations. These criteria shall be based on temperature, CO, and possibly settlement rate. The primary engagement lines should be designed to prevent the reaction from spreading into the main fill which is close to the reaction. The secondary line should prevent the reaction from entering the eastern and southern fill areas at the toe of the slope.



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4. Construction of reaction breaks in the main 160-acre fill area for the reaction of the engagement lines. The reaction break plans should include timelines and method of construction. The timelines and engagement lines should match.

5. Include the construction of reaction breaks/barrier between Canyon C, A, D, and Cell 5 in the event the reaction reaches the secondary engagement lines.

6. Use best available technology, such as grout injection, to slow or contain reaction movement to the south and east.

7. Description of the criteria that will mandate the temporary suspension of placing new waste.

CCL may submit an alternative plan to the LEA for review, only if such plan is adequately supported by substantive data and studies and provides assurances to the LEA that the reaction is no longer a threat to public health, safety and the environment.

2.22 On May 8, 2024, the LEA received the CO and H2 data (May 8, 2024 Data) in response to Directive 5 of the April 5, 2024 LEA Letter which required CCL to submit CO and H2 readings for all gas collection wells in the reaction area and wells 200 feet outside the reaction area by May 6, 2024.

2.23 On May 28, 2024, the LEA issued a response to CCL (May 28, 2024 LEA Letter) stating that the May 8, 2024 Data submittal is inadequate due to missing information. CCL was directed to resubmit the data as a standalone report with the gas data presented in a table, a summary of the sampling, including a map showing the reaction area as it is currently defined, description of the gas sampling performed, Quality Assurance/Quality Control (QA/QC) data (e.g., field and laboratory QA/QC samples and data including any flags), and proposed holding times, etc., with the signature of qualified person or licensed engineer by June 6, 2024.

Mitigation Measure 1B – Temperature Monitoring Probes

2.24 In the December 6, 2023 CCL Response to the November 21, 2023 LEA Letter, CCL

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agreed to install TMPs with a request for further clarification from the LEA on this requirement.

2.25 In order to collect data regarding intensity, depth, speed and direction of the reaction, the LEA required CCL to install TMPs. The November 21, 2023 LEA Letter provided recommended locations for the installation of 21 TMPs by January 8, 2024.

2.26 On December 6, 2023, the LEA, CalRecycle and CCL staff met to discuss TMPs per CCL's December 1, 2023 email request. CCL requested further clarification regarding probe locations, probe depths, and probe type.

2.27 On December 20, 2023, the LEA received the Landfill Reaction Area Temperature Monitoring Plan (December 20, 2023 Plan) from CCL for the installation of 20 TMPs and notification that the deadline of January 8, 2024 was not attainable. CCL proposed a new deadline of March 2024 to complete the installation based on availability of the materials, equipment, and the contractor.

2.28 On December 22, 2023, the LEA issued a letter (December 22, 2023 LEA Letter) accepting with conditions the December 20, 2023 Plan with conditions. Conditions included the submittal of design specifications and a typical design detail drawing of the TMPs, with specified probe depths, by February 15, 2024.

2.29 On January 2, 2024, the LEA received a letter from CCL (January 2, 2024 CCL Letter) with design specifications and design detail drawings for the TMPs. CCL agreed to meet the February 15, 2024 deadline, barring weather, material deliveries, health and safety, and permitting delays. CCL confirmed they would provide the LEA with weekly updates on the status of material deliveries and installation schedule.

2.30 On January 10, 2024 a virtual meeting was held between the CCL, the LEA and CalRecycle for a technical discussion. The LEA directed CCL to submit revised design specifications and design detail drawings for the TMPs to include the required depth intervals.



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2.31 On January 17, 2024, the LEA received a letter from CCL (January 17, 2024 CCL Letter) with a revised design specification and design detail drawings and depth intervals for the TMPs that were discussed during the January 10, 2024 meeting.

2.32 On January 19, 2024, CCL, the LEA, and CalRecycle met and discussed the telemetry system that will be used to record temperature data.

2.33 On January 29, 2024, the LEA issued a letter (January 29, 2024 LEA Letter) accepting the revised design specification and design detailed drawings for the TMPs. The LEA approved the latest schedule to install the TMPs by February 29, 2024 based on the January 11, 2024 weekly update from CCL regarding the material deliveries and revised installation schedule. In addition, as per the meeting on January 19, 2024, the LEA specified due date of February 8, 2024 for CCL to submit the specifications of the telemetry system that will be used to record temperature data.

2.34 On February 26, 2024, the LEA issued a letter to CCL (February 26, 2024 LEA Letter) regarding delays that CCL reported in the weekly status updates received through February 22, 2024. CCL stated that due to delays caused by rain events and for safety reasons, the completion time for drilling for TMP installation was estimated to be an additional 6-7 weeks. The LEA directed CCL to provide a written response by February 29, 2024 (current due date for completion of the TMP installation) that includes an updated construction schedule that details an accurate timeline for the installation of the TMPs, weekly goals for the installation, and what efforts and resources (such as additional equipment and workforce) are being implemented to expedite the work and meet the proposed timelines.

2.35 On February 29, 2024, the LEA received a response from CCL (February 29, 2024 CCL Letter) providing justification for delays and a new schedule for the installation of the TMPs. Due to weather conditions or related safety concerns, the anticipated completion date was extended from February 29, 2024 to April 4, 2024, weather permitting.



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2.36 On March 4, 2024, the LEA, CalRecycle and CCL staff met virtually to discuss issues with TMP installation to planned depths. The LEA and CalRecycle advised that CCL should install to the depth allowable and focus on getting the TMPs installed so that CCL can begin gathering data. The LEA also pointed out a typographical error and the lack of an official time extension request in the February 29, 2024 CCL Letter.

2.37 On March 4, 2024, the LEA received a revised response letter (March 4, 2024 CCL Letter) officially requesting modification to the timeline for TMP installation and correcting the typographical error noted in para. 2.36.

2.38 March 20, 2024, the LEA issued an approval (March 20, 2024 LEA Approval) to the modified schedule (March 4, 2024 CCL Letter) and April 4, 2024 completion date for the installation of TMPs, and directed CCL to continue to provide weekly updates on the progress of the installation of TMPs including any delays due to rain events or other special occurrence that may affect the modified schedule.

2.39 On March 20, 2024, the LEA issued a letter to CCL (March 20, 2024 LEA Letter) in response to a weekly update from CCL regarding the TMP installation received on March 14, 2024. The letter addressed the issues brought up by CCL that the well bores were saturated to the point that all five probes installed from March 11, 2024 through March 14, 2024 did not reach the proposed depth. The LEA determined that the adjustment to the remaining TMPs is necessary and required CCL to submit a report for the probe installation to the LEA by March 28, 2024 that would include: 1) an updated map showing the settlement area overlaid with the completed drilling locations, completed and proposed depths and remaining/planned drilling locations (if applicable), 2) drilling logs and 3) temperature logs of temperatures taken during drilling.

2.40 On March 28, 2024, LEA received the CCL report (March 28, 2024 Report) that stated the issues with achieving the proposed depths and a confirmation that sixteen (16) probes had been installed and were operational.

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2.41 On April 5, 2024, the LEA issued a letter (April 5, 2024 LEA Letter) directing CCL to: 1) relocate the planned installation for well TP-16 to an area outside of the reaction where drilling to the proposed depth may be feasible, and 2) submit a final construction report within 5 days of completion of the installation of all TMPs.

2.42 On April 10, 2024 virtual meeting was held between CCL, LEA and CalRecycle to discuss the progress of TMPs installation, the relocation of TMP TP-16 and TP-04, and the need for a formal extension request with justification for not meeting the April 4, 2024 deadline to complete installation of TMPs.

2.43 On April 12, 2024, LEA received the CCL's response (April 12, 2024 CCL Response) that addressed the two directives related to TMPs in the April 5, 2024 LEA Letter as well as items discussed during the April 10, 2024 meeting. CCL confirmed that it would submit weekly memorandum with temperature readings and analysis of those readings along with a summary and temperature graph of all TMPs to plot the trends of each TMP once the final construction report was completed.

2.44 On April 16, 2024, LEA received a letter from CCL (April 16, 2024 CCL Letter) to memorialize the April 10, 2024 virtual meeting and to request a time extension for the installation of TMPs to April 26, 2024 with justification that drilling operations for TMP installation were delayed due to saturated soil conditions from frequent rain events over the past two months and safety related concerns.

2.45 On April 24, 2024, LEA issued a letter to CCL (April 24, 2024 LEA Letter) accepting CCL's proposed timelines for TMP installation.

2.46 On May 3, 2024, the LEA received the Final Construction Report, 2024 Temperature Monitoring Probe Installation (May 3, 2024 CQA Report) as per Directive 2 of the April 5, 2024 LEA Letter.

2.47 On May 29, 2024, the LEA issued a response letter to the CQA Report (May 29, 2024 LEA Response) directing CCL to resubmit a CQA to the LEA by June 6, 2024 with a site



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map of the TMP's location, completion depth at each well, the reaction area as it is defined as of May 1, 2024, and a method (web-portal) for CCL to provide real-time access to temperature data to the LEA and CalRecycle. The temperature data included in the revised CQA Report was required to include the maximum weekly temperature recorded at each TMP, instead of or in addition to average weekly temperatures. Finally, the LEA advised that the revised CQA Report should include a signature and stamp of a licensed engineer to show all work can be clearly attributed to the licensee(s) in responsible charge of the work.

2.48 The May 29, 2024 LEA Response also addressed the weekly TMP reports and directed CCL to revise the weekly TMP reports with the weekly temperature readings to include graphs that show the maximum temperature recorded at each TMP instead of weekly average, as the criteria to implement a containment strategy must be based on maximum temperature readings and not an average temperature. The weekly TMP reports were also required to include the following additional details: a reaction map with the maximum observed temperature at each well with depth, a narrative describing any anomalies, outliers, data gaps, or malfunctions. The narrative must describe any temperature increases of 20°F or greater within 48 hours as stated in the April 5, 2024 LEA Letter and include an increase of 10°F in a week. The LEA advised that the weekly TMP reports should be a standalone document, and on the last weekly report for the month, CCL is directed to include a map that shows each TMP with color-coded observations based on the maximum observed temperature. CCL was required to submit revised weekly TMP reports beginning the week of June 2, 2024.

2.49 Additionally, the May 29, 2024 LEA Response specifically addressed the Weekly Cover Report dated May 14, 2024 that showed the reaction is extending south into areas outside the previously defined reaction area. To accurately track the reaction's progress, CCL was directed to install three specifically located temperature probes by June 12, 2024. CCL was reminded that while the settlement rate indicator is low, the reaction has advanced which



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requires the development of a plan to implement a containment strategy (Mitigation Measure 1A Soil Reaction Break/Barrier Plan).

2.50 A meeting was held on May 31, 2024 to discuss the directive in the May 29, 2024 LEA Response to add three TMPs. CCL stated that the settlement was misinterpreted in the Weekly Cover Report due to construction taking place in the area that showed settlement. Furthermore, CCL stated that there are TMPs near the subject area, planned LFG well installation in that area, and data that supports the reaction area is not expanding. LEA instructed CCL to reply by June 12, 2024, with installation plan, an alternate proposal or justification for no action based on information shared in meeting.

Mitigation Measure 2A – Geosynthetic Cover

2.51 In the December 6, 2023 CCL Response to the November 21, 2023 LEA Letter, CCL noted several concerns regarding the placement of soil and stated that an alternative proposal would be submitted to the LEA by December 8, 2023.

2.52 On December 8, 2023, the LEA received a Memorandum from CCL (December 8, 2023 CCL Memorandum) responding to the November 21, 2023 LEA Letter regarding the Mitigation Measure 2A requirement. The December 8, 2023 CCL Memorandum provided a description and timeline for two specific proposed alternatives to the additional cover as well as for the 24-inches of low permeability soil cover in and around the Reaction Settlement Area and any well showing signs of reaction as required by Mitigation Measure 2A: 1) Low Permeability Soil Cover, 2) Evaporative Soil Cover or 3) 12-mil Dura-Skrim Geosynthetic Cover (12-mil Cover).

2.53 On December 14, 2023, the LEA issued a response (December 14, 2023 LEA Letter) to the December 8, 2023 CCL Memorandum. The LEA advised CCL that although the placement of low permeability soil would be the most effective option to address the inadequacy of the existing cover over the reaction area, as it would prevent surface emissions of LFG while



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reducing oxygen infiltration. Because this option may take 12 weeks to implement which is the longest timeframe out of the three alternatives provided, it was no longer considered. Next, the proposed alternative to use an evaporative soil cover option using high permeability soil was deemed to be unacceptable as it would allow air, water, and LFG to migrate through the cover. CCL's proposed installation of the 12-mil Cover was the alternative that had the quickest installation timeline, within 5 weeks, and was an adequate option as a temporary measure to address cover conditions until the low permeability soil cover is added. Since the 12-mil Cover was not a long-term solution, CCL was required to install a more durable geosynthetic cover, 24-mil to 30-mil with welded seams, that will offer better performance and reduced maintenance. In short, the LEA recommended that CCL install the proposed 12-mil Cover now while it acquires low-permeability soil or opt to install a thicker and more durable geosynthetic cover between 24-mil to 30-mil with welded seams in lieu of the low permeability soil cover. A proposal for this option must be submitted to the LEA for review and approval.

2.54 On December 19, 2023 the LEA received a workplan from CCL (December 19, 2023 Plan) to install 30-mil high density polyethylene (HDPE) geosynthetic cover over the reaction settlement area.

2.55 On December 20, 2023, the LEA issued an approval (December 20, 2023 LEA Letter) on the condition that CCL submit the design specifications of the proposed geosynthetic cover pressure relief valves discussed in the December 19, 2023 Plan within 10 days.

2.56 On December 29, 2023, the LEA received a letter from CCL (December 29, 2023 CCL Letter) with the required information on the pressure relief valves.

2.57 On January 19, 2024, a meeting was held between CCL, LEA and CalRecycle to communicate that the pressure relief valves would not be approved by the LEA. Other methods to prevent potential LFG accumulation underneath the geosynthetic cover were discussed.

2.58 On January 23, 2024, the LEA received a letter from CCL (January 23, 2024



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CCL Letter) which stated that CCL no longer intended to install the pressure relief valves from the December 19, 2023 Plan. In addition, CCL provided an updated installation schedule for the 30-mil cover in the following order: 1) northerly portion of the western slope of the reaction area, 2) central portion of the western slope of the reaction area, 3) top deck of the reaction area and 4) north slope of the reaction area. Although CCL did not provide a specific date, the letter stated that installation of the cover was anticipated to take 8 weeks with an additional week for reporting. Lastly, CCL informed the LEA that it anticipated installing well boot seals on all wells located outside of the areas that will be covered with geosynthetic cover by February 16, 2024, and installing the remaining well boot seals as the geosynthetic cover is installed.

2.59 On January 26, 2024, the LEA issued a conditional approval (January 26, 2024 LEA Letter) in response to the January 23, 2024 CCL Letter. Per the conditions, in lieu of the pressure relief valves, CCL was to provide a system and procedure to ensure that LFG does not accumulate underneath the geosynthetic cover and to prioritize LFG extraction from the reaction area over other areas of the landfill, if necessary, by February 2, 2024. In addition, CCL was directed to submit weekly updates to the LEA on the geosynthetic cover installation (Weekly Geosynthetic Cover Updates) commencing the week of January 28, 2024 and complete the geosynthetic cover installation by March 25, 2024 (8 weeks from the start of cover installations as provided by the January 23, 2024 CCL Letter).

2.60 On February 2, 2024, the LEA received a response from CCL (February 2, 2024 CCL Letter) that adequately addressed all of the conditions listed in the January 26, 2024 LEA Letter as stated in the LEA response letter dated March 4, 2024 (March 4, 2024 LEA Letter).

2.61 To address ongoing delays documented in CCL's Weekly Geosynthetic Cover Updates received through February 23, 2024, the LEA issued the February 26, 2024 LEA Letter. CCL had reported delays caused by rain events and related safety issues without providing an update on the need for a revised installation schedule for the 30-mil geosynthetic cover. LEA

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6 instructed CCL to provide a written response by February 29, 2024 with an updated
7 construction schedule that details an accurate timeline for the installation of the geosynthetic
8 cover, weekly goals for the installation, and what efforts and resources (such as additional
9 equipment and workforce) are being implemented to expedite the work and meet the proposed
10 timeline.

11 2.62 The February 29, 2024 CCL Letter provided justification for delays and a new
12 schedule for the installation of the geosynthetic cover. Due to weather conditions and related
13 safety concerns, and an increase of the reaction area from 23.9 acres to 30 acres due to site
14 conditions, the anticipated completion date was extended from March 25, 2024 to April 26, 2024,
15 weather permitting. The submittal date for the completion report for the geosynthetic cover
16 installation was consequently extended to May 3, 2024.

17
18 2.63 On March 4, 2024, LEA, CalRecycle and CCL staff met virtually and pointed out a
19 typographical error with the compliance schedule and the lack of an official time extension request
20 in the February 29, 2024 CCL Letter.

21 2.64 On March 4, 2024 CCL corrected the typographical error referred to in para. 2.63
22 and officially requested modification to the timeline for geosynthetic cover installation.

23 2.65 On March 20, 2024, the LEA issued an approval (March 20, 2024 LEA Letter) to
24 the modified schedule and of the April 26, 2024 completion date for the installation of the 30-mil
25 geosynthetic cover, and directed CCL to continue to provide weekly updates on the progress of
26 the installation of the geosynthetic cover including any delays due to rain events or other special
27 occurrence that may affect the modified schedule.

28
29 2.66 On April 19, 2024 the LEA received a memorandum from CCL (April 19, 2024 CCL
30 Memorandum) that provided an updated geosynthetic coverage acreage, from 30 acres to 43.9
31 acres, and revised schedule for installation of the geosynthetic cover with, From April 26, 2024 to
32 July 12, 2024. According to the memorandum, April 26, 2024 deadline could not be met due to



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delays related to concerns with wet weather, high winds, slope stability, and safety. The July 12, 2024 completion date did not include the replacement of the 12-mil Cover that is currently over the western slope with the 30-mil geosynthetic cover due to high leachate levels.

2.67 On May 10, 2024, the LEA issued a letter to CCL (May 10, 2024 LEA Letter) directing CCL to resubmit a revised schedule by May 14, 2024, that prioritizes the installation of the 30-mil geosynthetic cover in the reaction area (30 acres per the March 4, 2024 CCL Letter) over additional areas that CCL elected to also cover, and include a completion date for installation of the cover over the 30 acres, and a plan to manage the leachate at the western slope to allow for timely installation of the 30-mil geosynthetic cover.

2.68 On May 14, 2024, the LEA received two memorandums from CCL. One memorandum provided additional information on the need for the extended deadline of July 12, 2024, to complete the installation of the 30 acres of geosynthetic cover over the reaction area (May 14, 2024 CCL Updated Schedule). The other memorandum detailed the construction of a toe drain system to manage the leachate and allow for the installation of geosynthetic cover over the portion of the western slope currently covered by the 12-mil Cover. (May 14, 2024 CCL Plan).

2.69 On May 29, 2024, the LEA issued a letter to CCL (May 29, 2024 LEA Letter) stating that the May 14, 2024 CCL Updated Schedule is adequate, and required CCL to continue to provide weekly updates on the progress of the installation of the geosynthetic cover that include specific reasons for any further delays that may be due to rain events or other special occurrence that may affect the extended implementation of the new schedule. Also, the LEA determined the May 14, 2024 CCL Plan to be adequate contingent on the condition that CCL confirms waste temperatures are below the manufacturer's recommended maximum temperature limit of the proposed materials used.

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Mitigation Measure 2B - Cover Tracking

2.70 The December 6, 2023 CCL Response to the November 21, 2023 LEA Letter had no comment on Mitigation Measure 2B requirements and agreed to submit the required plan by the due date.

2.71 On December 6, 2023, the LEA received the Soil Cover Tracking Written Plan (December 6, 2023 Cover Tracking Plan) to monitor for fissures and cracks in the soil cover, collect and compile notes and pictures, and submit Weekly Cover Reports to the LEA. To track and document settlement, CCL proposed to use drones to document settlement on a biweekly basis.

2.72 On December 14, 2023, the LEA issued a letter (December 14, 2023 LEA Letter) requiring CCL to revise the December 6, 2023 Cover Tracking Plan to include response to issues that may arise with the geosynthetic cover, such as tears and where fill is needed to support the liner or maintain drainage, the necessary actions taken, and a photo log that has before and after pictures of the cover issues.

2.73 LEA received the Revised Plan dated December 21, 2023 (December 21, 2023 Revised Plan) that included documentation and tracking of issues related to the geosynthetic cover in addition to soil cover as well as a photo log of observations with before and after pictures.

2.74 On January 3, 2024, the LEA issued an approval (January 3, 2024 LEA Letter) to the December 21, 2023 Revised Plan and directed CCL submit Weekly Cover Reports starting January 9, 2024.

2.75 The LEA letter dated March 22, 2024 (March 22, 2024 LEA Letter), responded to the Slope Stability Analysis Report (Mitigation Measure 3) and addressed the Weekly Cover Reports. The LEA directed CCL to revise the Weekly Cover Reports to include a log with a summary and a map to track the documented fissures and tension cracks and to identify trends, to evaluate the documented series of fissures and tension cracks reported in recent Weekly Cover



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6 Reports from February and March 2024, and to include methods used to track the instability in
7 the reaction area that is obscured by the geosynthetic cover.

8 2.76 On April 10, 2024, a virtual meeting was held between CCL, LEA and CalRecycle
9 (April 10, 2024 Meeting) to discuss the status of Mitigation Measures 1-3 and the need for a
10 second revision of the December 6, 2023 Cover Tracking Plan to address Mitigation Measure 2B.
11 The LEA directed CCL to include in future weekly reports a section to document any instability
12 events such as observations that led to CCL directing crews to cease work on the western slope
13 mid-day March 20, 2024, because of concerns related to slope stability and pending the slope
14 stability analysis report as per the March 22, 2022 Weekly Cover Report.

15 2.77 CCL submitted the second Revised Cover Tracking Plan dated April 16, 2024
16 (April 16, 2024 Revised Plan) that proposed to submit a map to identify and evaluate trends in
17 the reported fissures and tension cracks. CCL proposed to perform daily visual inspections and
18 bi-weekly drone flyovers, and other actions to track the instability of the reaction area obscured
19 by the geosynthetic cover. In addition, CCL would include a profile of the western slope consisting
20 of cross sections taken during the beginning and end of the month in the report.

21 2.78 On May 2, 2024, the LEA approved the second Revised Cover Tracking Plan (May
22 2, 2024 LEA Letter) and directed CCL to submit monthly reports starting May 14, 2024. The LEA
23 also reminded CCL to include a section on stability issues as discussed during the April 10, 2024
24 Meeting.
25

26 2.79 The LEA issued a letter to CCL on May 29, 2024 (May 29, 2024 LEA Letter) to
27 address, among other items, the Weekly Cover Reports dated May 10 and May 14, 2024, in which
28 CCL made inaccurate statements that misrepresented the reason why the liner crews were
29 removed from the western slope. The specific CCL statements were that "Landfill personnel were
30 directed to cease normal activities on the western slope on or around March 20, 2024, because
31 of the LEA's concerns regarding the potential slope stability and related safety
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concerns.” The LEA noted that CCL elected to remove crews without notifying the LEA for at least 48 hours, when the LEA received the March 22, 2024 Weekly Cover Report. CCL was directed to amend each the May 10 and 14, 2024 reports to reflect that CCL elected to move the liner crews because the crews noticed an additional bulge of waste at the toe of the slope. In addition, CCL was required to include slope stability concerns to the Weekly Cover Reports beginning June 4, 2024.

Mitigation Measure 3 – Slope Analysis

2.80 The December 6, 2023 CCL Response to the November 21, 2023 LEA Letter had no comment on the Mitigation Measure 3 requirement and agreed to submit a work plan with timeline by the due date.

2.81 CCL submitted the Slope Stability Analysis Workplan to the LEA on December 14, 2023 (December 2023 Slope Stability Analysis Plan).

2.82 On December 20, 2023, the LEA issued a letter accepting the December 2023 Slope Stability Analysis Plan with conditions. According to a timeline submitted by CCL, a Slope Stability Analysis Report would be submitted to the LEA by February 22, 2024.

2.83 The Slope Stability Analysis Report was received by the LEA on February 22, 2024 (February 2024 Slope Stability Analysis Report).

2.84 The March 22, 2024 LEA Letter in response to the February 2024 Slope Stability Analysis Report required CCL to perform additional analyses based on the current actual observed conditions of the waste and gas extraction wells. For example, the analysis in the February 2024 Slope Stability Analysis Report used peak shear strength instead of reduced shear strength. CCL was also directed to include a plan to monitor and record the temperature of the liner at the bottom of the landfill to verify and document that that there are no anticipated impacts to its the long-term performance given the potential exposure to high subsurface temperatures associated with the ongoing reaction. The plan regarding the liner was referred to the LARWQCB.



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2.85 On May 8, 2024, the LEA received a draft of the revised Slope Stability Analysis Report dated May 2024 (May 2024 Slope Stability Analysis Report). The report is currently under review.

Mitigation Measure 4 – Manufacturer Specifications

2.86 The December 6, 2023 CCL Response to the November 21, 2023 LEA Letter had no comment regarding Mitigation Measure 4 and agreed to comply with this mitigation measure.

2.87 The May 29, 2024 LEA Letter in response to the May 14, 2024 Plan to install a toe drain at the western slope directed CCL to confirm the waste temperatures are below the manufacturer's recommended maximum temperature limit of the proposed pipe materials. The letter guided CCL to use a forward-looking infrared camera to ensure the HDPE or other material can perform as designed within the recommended temperature limits.

3.0 STATEMENT OF FACTS PERTAINING TO VIOLATION 27 CCR § 20921:

3.1 Pursuant to 27 CCR Section 20921, in order to provide for the protection of public health and safety and the environment, the operator shall ensure that the concentration of methane gas migrating from the disposal site must not exceed 5% by volume in air at the disposal site permitted facility boundary or an alternative boundary approved in accordance with 27 CCR § 20925.

3.2 Beginning with the focused inspection dated September 1, 2023, periodic inspection reports dated September 19, October 25, November 28, December 19, 2023, January 17, February 7, March 26, and April 30, 2024, continue to note the violation for exceedance of methane as described below.

3.3 On September 1, 2023, the LEA measured the methane level at perimeter monitoring well GP-13 at above 5% by volume in air (bv), resulting in a violation of 27 CCR Section § 20921. CCL was directed via email on September 9, 2023, to comply with 27 CCR § 20937 which requires submittal of a remediation plan for approval and implementation within 60 days of noted exceedance and as documented on the report dated September 1, 2023. CCL submitted a



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remediation plan to address the methane exceedance at GP-13 on September 8, 2023 (September 8, 2023 Remediation Plan).

3.4 On September 15, 2023, CCL submitted a second remediation plan to include methane exceedance measured by the CCL at GP-15 (September 15, 2023 Remediation Plan). On September 19, 2023, the LEA measured methane levels at perimeter monitoring wells GP-13 and GP-15 at above 5% bv resulting in a violation of 27 CCR § 20921.

3.5 LEA electronic communication with CCL called for CCL to submit subsequent revised plans dated October 6, 2023 (October 6, 2023 Remediation Plan) and November 22, 2023 (November 22, 2023 Remediation Plan) addressing the exceedance at both probes GP-13 and GP-15. The LEA issued a rejection letter on February 6, 2024 (February 6, 2024 LEA Letter) directing CCL to respond to specific comments in a revised plan by February 23, 2024.

3.6 On February 27, 2024, the LEA received the latest version of the remediation plan (February 2024 Remediation Plan) that proposed to install an additional 107 LFG extraction wells by July 31, 2024.

3.7 The LEA approved the February 2024 Remediation Plan by letter May 8, 2024 (May 8, 2024 LEA Letter) requiring the LFG well installation to be completed by July 31, 2024, as proposed by CCL. Upon installation of the LFG extraction wells, CCL is required to continue to monitor the methane levels in all perimeter monitoring wells on a weekly basis and provide the results to the LEA for a monitoring period of 120 days. If the LEA's monitoring shows that the concentration of methane is and remains below the regulatory limit for three (3) consecutive monitoring events and the weekly results submitted by CCL provide supporting evidence that the landfill gas is controlled not to exceed 5% bv in air at the Site's perimeter boundary, then the Site will be deemed compliant with 27 CCR § 20921. If compliance with 27 CCR § 20921 is not achieved within the 120-day monitoring period, then a new remediation plan must be submitted to the LEA for review and approval within 30 calendar days.

3.8 The February 2024 Remediation Plan was also approved by CalRecycle on April 15, 2024 (April 15, 2024 CalRecycle Letter) as required by 27 CCR § 20937.

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4.0 PLACEMENT OF CCL ON THE INVENTORY:

4.1 The LEA issued inspection reports of CCL dated September 1, September 19, October 25, November 28, December 19, 2023, and January 17, 2024. Violations of 27 CCR, Sections 20921 (Gas Monitoring and Control) and 20750 (Site Maintenance) have been noted monthly on LEA inspection reports to date beginning September 1, 2023, and November 28, 2023, respectively.

4.2 On February 8, 2024, CalRecycle notified CCL in a letter sent via certified mail, and received by CCL on February 10, 2024, that if the violations were not corrected within 90 days of receipt of the letter that pursuant to PRC § 44104, the site would be placed on the Inventory of Solid Waste Facilities Which Violate State Minimum Standards (Inventory).

4.3 After confirming with the LEA that violations of the noted standards remained uncorrected and were continuing, on May 16, 2024, pursuant to 14 CCR § 18364, an Inclusion letter was sent by CalRecycle, notifying CCL that CCL was placed on the "Inventory of Facilities Violating State Minimum Standards" list (Inventory List). Inclusion on the Inventory List requires the LEA to establish and issue a compliance schedule to the facility within 15 business days from the date of the inclusion letter. (14 CCR § 18365(a).)

4.4 The purpose of the compliance schedule is to ensure that diligent progress is made by the operator to bring the facility into compliance pursuant to PRC § 44106. (14 CCR § 18304.3.)

4.5 The compliance schedule may be incorporated into a Notice and Order. (14 CCR §§ 18304.3 and 18361(a).)

4.6 The Compliance Schedule must require that all tasks and deadlines be completed within the timeframes specified in 14 CCR § 18365(b).

5.0 VIOLATIONS:

5.1 CCL is in violation of 27 CCR § 20750 (Site Maintenance) and 27 CCR § 20921 (Gas Monitoring and Control).

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6.0 ORDER FOR COMPLIANCE SCHEDULE:

6.1 On June 4, 2024, the LEA met with CCL to discuss the issuance of the Compliance Order. The Compliance Schedule was reviewed with CCL and an extension was asked for the Compliance Deadline for Milestone 1A-2, 1B-1 and 2A-1. The LEA granted the extensions and has updated the deadlines to the dates requested by CCL.

6.2 Pursuant to PRC §§ 43209, 44106, 45000, 45005, 45011, 45017, and 45023, 27 CCR §§ 20750 and 20921, and 14 CCR §§ 18304, 18304.1, 18304.3(b), and 18365(a), Respondent CCL is hereby ordered to comply with the following compliance schedule to eliminate the existing violations:

Compliance Schedule		
<i>27 CCR Section 20750 – Site Maintenance</i>		
<i>The operator shall promptly repair or correct defective conditions with respect to state minimum standards. All other aspects of the site shall be kept in a state of reasonable repair. THE FINAL DATE TO ACHIEVE FULL COMPLIANCE WITH 27 CCR § 20750 IN ACCORDANCE WITH THE COMPLIANCE SCHEDULE IS AUGUST 2, 2024.</i>		
Milestone	Action Plan/Directive	Compliance Deadline
1A - 1	<p>Submit a revised Air/Soil Break Plan to the LEA for review and approval. The revised Air/Soil Break Plan must fully address the LEA directives including data from TMPs and LFG collection wells (refer to the May 3, 2024, LEA Letter for details) to inform the required items mentioned below:</p> <p>a. Investigate how each cell or phase was constructed and examine if air/soil breaks between cells/phases can be exploited. The investigation should include a review of where haul roads were constructed to determine if the inert roads can also be used as fuel breaks. Information from the investigation should be used to develop where containment breaks should be placed.</p> <p>b. Propose a set of criteria for the primary and secondary engagement lines and the type of reaction breaks/barriers and/or mitigations. These criteria shall</p>	July 8, 2024



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	<p>be based on temperature, CO, and possibly settlement rate. The primary engagement lines need to prevent the reaction from spreading in the main fill close to the reaction.</p> <p>The secondary engagement lines need to prevent the reaction from entering the eastern and southern fill areas at the toe of the slope.</p> <p>c. Investigate and propose construction of air/soil reaction breaks in the main 160-acre fill area for the reaction of the engagement lines with either an inert material or air.</p> <p>d. Include the construction of air/soil reaction breaks/barrier between Canyon C, A, D, and Cell 5 in the event the reaction reaches the secondary engagement lines.</p> <p>e. Include timelines and method of construction. The timelines and engagement lines must match.</p> <p>f. Use best available technology, such as grout injection, to slow or contain reaction movement to the south and east.</p> <p>g. Description of the criteria that will mandate the temporary suspension of placing new waste.</p> <p><i>CCL may submit an alternative plan to the LEA for review, only if such plan is adequately supported by substantive data and studies and provides assurances to the LEA that the reaction is no longer a threat to public health, safety and the environment.</i></p> <p>Note: If the air/soil break plan submitted by CCL is rejected by the LEA after the final compliance date for this violation, then a penalty will be assessed from the date LEA issues a rejection until the air/soil break plan is approved by the LEA. (No penalty will be assessed during the period of LEA review.)</p>	
<p>1A - 2</p>	<p>Submit a report with CO and H2 readings for all gas collection wells in the reaction area and wells 200 feet outside the reaction area, including the following:</p>	<p>June 11, 2024</p>



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	<p>a. The gas data tabulated with the following information: date collected or measured, wellhead temperature, analyte names and concentrations, including but not limited to permanent gases and H₂ analyzed using thermal conductivity detection/ gas chromatography (TCD/GC) ASTM D1946-14 and CO analyzed using flame ionization detection/total combustion analysis (FID/TCA), EPA Method ALT-144</p> <p>b. Sampling summary, map showing the reaction area as it is currently defined, gas sampling plan, Quality Assurance/Quality Control data, and proposed holding times, and whether holding times were exceeded, etc.</p> <p>c. Report as a standalone document that is signed by a licensed engineer or qualified responsible person.</p>	
<p>1A - 3</p>	<p>Submit the laboratory test results for <u>all</u> monthly LFG sampling (including CO and H₂) from a set of LFG wells selected by the LEA after the baseline sampling for CO and H₂ is completed and provided to the LEA as described above. The LFG data that is collected must be submitted to the LEA in a standalone report signed by a licensed engineer or qualified responsible person and include a discussion of the sampling, LFG data, and a graphic showing CO and H₂ trends over time.</p>	<p>Monthly by the 15th of the following month, from the date that CCL receives the selected LFG wells from the LEA</p>
<p>1B - 1</p>	<p>Submit a revised Completion Report for the installation of the TMPs that include the following:</p> <p>a. Site map that includes the location of the TMP's location, the completion depth at each well, and as-builts. The map must also include the reaction area as it is defined as of May 1, 2024.</p> <p>b. Provide real-time access to temperature data to the LEA and CalRecycle and specify the method of access (e.g., web portal).</p> <p>c. Temperature data that includes the maximum temperature recorded at each TMP.</p>	<p>June 11, 2024</p>



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	<p>d. Signature and stamp of a licensed engineer or qualified responsible party to show all work can be clearly attributed to the licensee(s) in responsible charge of the work.</p>	
<p>1B - 2</p>	<p>Continue to submit the Weekly TMP Reports. Revise the reports so they are standalone documents that include the following:</p> <p>a. Graphs that show the maximum temperature recorded at each TMP. CCL may choose to continue to also include the average temperature in the weekly reports.</p> <p>b. Map delineating the reaction area with the maximum observed temperature at each TMP with depth.</p> <p>c. Narrative describing any anomalies, outliers, data gaps, issues or malfunctions. The narrative must describe any temperature increases of 20°F or greater within 48 hours or 10°F in a week.</p>	<p>June 7, 2024, and weekly each Friday thereafter</p>
<p>1B - 3</p>	<p>Provide a temperature contour map that shows each TMP with color-coded observations based on the maximum observed temperature collected during the month. Example was provided in the May 29, 2024 LEA Response.</p>	<p>Monthly by the 15th of the month beginning June 2024.</p>
<p>1B - 4</p>	<p>Install three temperature probes around the area that is extending south into areas outside of the previously defined reaction area as shown in the Weekly Cover Report dated May 14, 2024. Map showing locations of wells around the extended reaction area was provided in the May 29, 2024 LEA Response.</p> <p>Provide a final completion report that includes a map and as-builts that is signed by a registered engineer or qualified responsible person.</p>	<p>July 11, 2024</p>
<p>2A - 1</p>	<p>Install the approved 30-mil HDPE geosynthetic cover over the 30-acre reaction settlement area as defined in the Weekly Cover Reports dated up through May 28, 2024, and around any wells showing signs of reaction, i.e., any wells with temperature over 160°F or CO concentrations over 1,500 ppmv.</p>	<p>August 2, 2024</p>



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<p>2A - 2</p>	<p>Continue to provide Weekly Updates on the Installation of the 30-mil Geosynthetic Cover including a map showing approximate limits of the installed geosynthetic cover. Updates shall include any delays due to rain events or other special occurrences.</p> <p>Revise the map to show the required 30-mil geosynthetic coverage area, delineate any areas showing settlement and any wells showing signs of reaction.</p>	<p>Ongoing on Fridays with revised map beginning June 14, 2024.</p> <p><i>(Note: Weekly reporting may be reduced in frequency or discontinued only after the required geosynthetic cover is installed and with LEA written approval.)</i></p>
<p>2B</p>	<p>Continue to submit the Weekly Geosynthetic Cover Reports as in the approved April 16, 2024 Revised Written Plan, include the required directives in the May 29, 2024 LEA Letter.</p>	<p>Ongoing</p> <p><i>(Note: Weekly reporting may be reduced in frequency or discontinued only with LEA written approval.)</i></p>
<p>3 - 1</p>	<p>Ensure slope stability issues are included in the Weekly Geosynthetic Cover Reports as directed in the May 3, LEA Letter and May 29, 2024 LEA Response.</p>	<p>Ongoing</p> <p><i>(Note: Weekly reporting may be reduced in frequency or discontinued only with LEA written approval.)</i></p>
<p>3 - 2</p>	<p>Submit a West and North Slope Stability Analysis Final Report that fully addresses LEA's comments.</p>	<p>Two weeks from the date of the LEA comment letter</p>
<p><i>27 CCR Section 20921 – Gas Monitoring and Control</i> <i>The concentration of methane gas migrating from the disposal site must not exceed 5% by volume in air at the disposal site permitted facility boundary or an alternative boundary approved in accordance with § 20925.</i> THE FINAL DATE TO ACHIEVE FULL COMPLIANCE WITH 27 CCR § 20921 IN ACCORDANCE WITH THE COMPLIANCE SCHEDULE IS NOVEMBER 28, 2024.</p>		



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<p>1 2 3 4 5 6 7 8 9</p> <p>4 - 1</p>	<p>Install and operate an additional 107 LFG extraction wells as per approved February 26, 2024 Remediation Plan for LFG Exceedance. Notify the LEA upon completion.</p> <p>Provide a final completion report that includes a map and as-builts that is signed by a registered engineer or qualified responsible person.</p>	<p>July 31, 2024</p>
<p>10 11 12 13 14 15</p> <p>4 - 2</p>	<p>Continue to submit a weekly status update on the installation of the LFG extraction wells as per the May 8, 2024 LEA Letter.</p>	<p>Ongoing</p> <p><i>(Ongoing until completion of installation of all LFG extraction wells listed in the February 26, 2024 Remediation Plan.)</i></p>
<p>16 17 18 19 20 21 22 23 24</p> <p>4 - 3</p>	<p>Continue to submit weekly results of methane readings at perimeter monitoring wells GP-13 and GP-15.</p>	<p>Ongoing until compliance with 27 CCR 20921 has been demonstrated as set forth in Milestone 4-4</p> <p><i>(Note: Weekly reporting may be reduced in frequency or discontinued only with LEA written approval.)</i></p>
<p>25 26 27 28 29 30 31 32</p> <p>4 - 4</p>	<p>Demonstrate compliance with 27 CCR Section 20921 within the 120-day compliance period that begins after the completion of the planned LFG extraction well construction referred to in the February 2024 Remediation Plan.</p> <p>In order to demonstrate compliance, the concentration of methane must be at or below regulatory limit for three (3) consecutive monitoring events conducted by the LEA, and the weekly results submitted by CCL must provide supporting evidence that the LFG is controlled not to exceed 5% by volume in air at the site's perimeter boundary.</p>	<p>120 days after completion of the LFG extraction well installation and no later than November 28, 2024 (Compliance Period)</p> <p><i>(Note: November 28, 2024 is based on the</i></p>



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		<i>anticipated completion date for installation of the LFG extraction wells.)</i>
5	<p>Submit a consolidated monthly report with individual maps overlaid with the following data in an easily understood format</p> <ul style="list-style-type: none"> - Defined reaction area; - Expansion of reaction area if any; - Weekly TMP data; - Settlement with heat maps; and - LFG data including, but not limited to CO and H2 data 	<p>Monthly by the 15th of the month, from the date that CCL receives the selected LFG wells from the LEA - Refer to Milestone 1A-3</p> <p><i>(Note: Monthly reporting may be reduced in frequency or discontinued only with LEA written approval.)</i></p>

7.0 APPLICABLE TO ALL MILESTONES:

7.1 CCL must obtain all required and necessary Federal, State, and local permits prior to commencement of any work at the site.

7.2 Notwithstanding anything to the contrary herein, if any of the above milestones and compliance deadlines cannot be met in good faith, CCL may submit a written extension request to the LEA setting forth good cause justification.

7.3 Pursuant to PRC § 45011, failure to comply with the final compliance date for each violation, unless otherwise excused in writing by the LEA, will result in the LEA issuing an administrative penalty order for penalties payable by CCL to the LEA, of up to \$5,000 per day for each day that CCL is in violation of the final compliance schedule for a particular violation, calculated from the day after the violation compliance date, until the date compliance is achieved and verified by the LEA.

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8.0 NOTICE OF FURTHER PENALTIES AND ENFORCEMENT THAT MAY RESULT FROM FAILURE TO COMPLY WITH THE LEA'S ORDER:

8.1 The LEA may assess administrative civil penalties not to exceed five thousand dollars (\$5,000) for each violation, for each day that the violation continues, if compliance is not achieved in accordance with the compliance schedule set forth in this Order. (PRC §§ 45010.1 and 45011.)

8.2 The LEA may suspend or revoke the solid waste facility permit if the facility does not meet the requirements contained in the compliance schedule issued by the LEA until the violation(s) of state minimum standards which caused the facility to be included in the Inventory are remedied. (PRC §§ 44305 and 44306, and 14 CCR §§ 18307 and 18368(b).)

8.3 The LEA may file a petition in the Superior Court for injunctive relief to enforce any part of this Order. (PRC §45014.)

8.4 Upon failure to comply with the Order, the LEA may bring an action in the Superior Court to impose upon CCL civil penalties of not more than ten thousand dollars (\$10,000) for each day a CCL is in violation of the Order. (PRC §§ 45023 and 45024.)

8.5 The LEA and/or CalRecycle shall not be liable for injuries or damages to persons or property resulting from acts or omissions by CCL or related parties in carrying out activities pursuant to this order, nor shall the LEA and/or CalRecycle be held as a party to any contract entered into by CCL or its agent(s) in carrying out activities pursuant to this Order.

8.6 Nothing in this Order shall constitute or be construed as a satisfaction or release from liability for any conditions or claims arising as a result of past, current, or future operations. Notwithstanding compliance with the terms of this Order, CCL may be required to take further actions as necessary to protect public health and safety or the environment.

8.7 This Order does not relieve CCL from complying with all other local, state, and federal requirements or prevent the LEA and/or CalRecycle from taking any and all other actions allowed by law.

8.8 This Order is supported by the accompanying declarations by Eric Morofuji and Mark Como.



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8.9 This Order may only be amended in writing by an appropriate representative of the LEA.

9.0 RIGHT TO APPEAL

9.1 CCL has the right to appeal this Order (PRC §§ 44307 and 44310) by submitting a written request for a hearing, together with a statement of issues on which appeal is based, within 15 days. Request for Hearing is provided with this Order. The appeal must be sent via U.S. Mail to Los Angeles County Public Health, Solid Waste Management Program/Local Enforcement Agency (LEA), 5050 Commerce Drive, Baldwin Park, Ca 91706, Attention: Karen Gork or via electronic mail to kgork@ph.lacounty.gov.

9.2 An appeal does not stay the effect of any provision of this Order. However, you may petition the Director of CalRecycle, in writing, to stay the effect of this Order, or portion thereof, pending the completion of administrative appeals. (PRC § 45017.) A petition submitted must be in writing and shall state the extraordinary circumstances that justify the stay. The petition shall also state the grounds, if any, on which a finding may be made that the immediate effect of the order or determination will preclude or interfere with the provision of an essential public service so that the public health and safety or the environment will be adversely affected.

10.0 CERTIFICATION

10.1 This Compliance Order is issued as of the date set forth below.

Signed: *Liza Frias* Date: June 6, 2024

Liza Frias, Director, Environmental Health
Los Angeles County LEA

Attachments:

- Declarations
- September 1, 2023 LEA Focused Inspection Report



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September 19, 2023 LEA Periodic Inspection Report

October 25, 2023 LEA Periodic Inspection Report

November 28, 2023 LEA Periodic Inspection Report

December 19, 2023 LEA Periodic Inspection Report

January 17, 2024 LEA Periodic Inspection Report

February 7, 2024 LEA Periodic Inspection Report

March 26, 2024 LEA Periodic Inspection Report

April 30, 2024 LEA Periodic Inspection Report

May 14, 2024 LEA Focused Inspection

October 16, 2023 CalRecycle Letter

October 17, 2023 LEA Letter

October 20, 2023 CCL Response

November 14, 2023 CalRecycle Letter

November 21, 2023 LEA Letter

December 6, 2023 CCL Response

April 5, 2024 LEA Letter

April 12, 2024 CCL Response

March 27, 2024 Plan

May 3, 2024 LEA Letter

May 8, 2024 Data

May 28, 2024 LEA Letter

December 20, 2023 Plan

December 22, 2023 LEA Letter

January 2, 2024 CCL Letter

January 17, 2024 CCL Letter



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January 29, 2024 LEA Letter

February 26, 2024 LEA Letter

February 29, 2024 CCL Letter

March 4, 2024 CCL Letter

March 20, 2024 LEA Approval

March 20, 2024 LEA Letter

March 28, 2024 Report.

April 16, 2024 CCL Letter

April 24, 2024 LEA Letter

May 3, 2024 CQA Report

May 29, 2024 LEA Response

December 8, 2023 CCL Memorandum

December 14, 2023 LEA Letter

December 19, 2023 CCL Plan

December 20, 2023 LEA Letter

December 29, 2023 CCL Letter

January 23, 2024 CCL Letter

January 26, 2024 LEA Letter

February 2, 2024 (CCL Letter)

April 19, 2024 CCL Memorandum

May 10, 2024 LEA Letter

May 14, 2024 CCL Updated Schedule

May 14, 2024 CCL Plan

May 29, 2024 LEA Letter

December 6, 2023 Cover Tracking Plan



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December 21, 2023 Revised Plan

January 3, 2024 LEA Letter

March 22, 2024 LEA Letter

April 16, 2024 Revised Plan

May 2, 2024 LEA Letter

CCL Barrier Discussion presentation

Isolation Break Criteria Example document

December 2023 Slope Stability Analysis Plan

February 2024 Slope Stability Analysis Report

February 26, 2024 60-Day Remediation Plan for GP-13 and GP-15

April 15, 2024 CalRecycle Response to 60-Day Remediation Plan

May 8, 2024 LEA Letter Response to 60-Day Remediation Plan

Request for Hearing Form