



CHIQUITA CANYON

A Waste Connections Company

August 15, 2023

Via E-Mail

Dr. Muntu Davis, M.D., M.P.H.
Health Officer
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**Re: Chiquita Canyon Landfill – Response to Public Health’s August 8, 2023
Letter re Odor Mitigation Recommendations**

Dear Dr. Muntu:

On August 8, 2023, Chiquita Canyon, LLC (“Chiquita”) received recommendations from the Los Angeles County Department of Public Health (“Public Health”) in response to Chiquita’s July 27, 2023 Condition 69 Report and August 1, 2023 letter to Public Health. Public Health’s August 8 letter directed Chiquita to immediately implement six actions, listed below, recommended by Chiquita’s consultant, SCS Engineers (“SCS”), to mitigate potential impacts to the surrounding community.

Chiquita is already implementing all of SCS’s recommendations. Chiquita provides this response in accordance with Public Health’s request to provide, by August 15, 2023, a description of the implementation status of each SCS recommendation, and any other actions Chiquita is taking to mitigate potential impacts.

1. **Expand the current air monitoring program to include dimethyl sulfide (“DMS”).**
Chiquita is taking two steps to expand the current monitoring program to include DMS.
 - a. **Grab samples:** First, Chiquita will be taking weekly grab samples at the 12 existing air monitoring stations, additional off-site locations (discussed below, recommendation #3), and additional on-site locations (discussed below, recommendation #4) for additional constituents (discussed below, recommendation #2), including DMS.
 - i. **Timeline:** The timeline for implementing is discussed below in recommendation #2.
 - b. **Continuous monitoring feasibility study:** As explained in SCS’s August 1 recommendations, no real-time monitoring devices exist for DMS. SCS contacted multiple air monitoring device manufacturers, including the manufacturer for the

existing air monitoring stations, and was told by all that there were no air monitoring devices that could conduct continuous DMS monitoring. Because it is not possible to continuously monitor for DMS directly, SCS recommended that Chiquita evaluate the efficacy of using a continuous TRS monitor as a potential surrogate for continuous DMS monitoring. Chiquita plans to deploy 2 continuous TRS monitors, co-located with 2 of the existing air monitoring stations, including at least 1 station on the northwest side of the Landfill (closest to Val Verde) and at 1 station in the nearby community. Once Chiquita installs the TRS monitors, it will use the weekly grab samples of DMS taken at those air monitoring stations to try to create a correlation factor between TRS, hydrogen sulfide (“H₂S”), and DMS. If a correlation can be found, then Chiquita will use the TRS monitors to collect continuous, real-time TRS data from which continuous, real-time DMS levels can be estimated.

- i. Timeline: Chiquita estimates that the 2 new TRS monitors will be online by August 31 and that it will be able to determine whether a correlation factor exists by mid-October.

2. Enhance and expand the constituents sampled in the current air monitoring program.

Chiquita is taking two steps to expand the list of constituents currently sampled in the existing air monitoring program.

- a. Grab samples: Chiquita will be taking weekly grab samples at the 12 existing air monitoring stations that are a part of Chiquita’s current air monitoring program. Samples will be tested for:

- U.S. Environmental Protection Agency (“EPA”) TO-15 constituents¹
- South Coast Air Quality Management District (“SCAQMD”) Method 307 sulfur compounds (including DMS)
- Odor samples
- Anything else recommended by the toxicologist retained to work with the Technical Advisory Committee (“TAC Toxicology Consultant”)

- i. Timeline: Chiquita is preparing a proposed monitoring strategy, which it anticipates will be complete by August 18. Chiquita will submit the proposed monitoring strategy to the TAC Toxicology Consultant for review and will make revisions as recommended by the TAC Toxicology Consultant. In the meantime, Chiquita will begin sampling for the TO-15 constituents and the SCAQMD Method 307 sulfur compounds (including DMS) during the week of August 14. Chiquita will begin the odor sampling during the week of August 28. The additional time is necessary

¹ The U.S. EPA TO-15 constituents are Volatile Organic Compounds (“VOCs”) and include the constituents that are already tested for under Chiquita’s existing air monitoring program. This list may be adjusted based on input from the TAC Toxicology Consultant.

in order to empanel an odor panel (a group of professionals trained on odor detection) to comply with the American Society for Testing and Materials (“ASTM”) methodology for odor analyses.

- b. Continuous monitoring feasibility study: Chiquita will install 2 monitors that are capable of continuously monitoring for benzene, toluene, ethylbenzene and xylene (“BTEX”), co-located at the 2 existing air monitoring stations that will have the new TRS monitors. Chiquita will evaluate the data to determine whether these monitors should be incorporated into the existing air monitoring stations on a permanent basis by comparing the data to laboratory data and trending the data to see how the real-time data correlates with the laboratory data from samples collected at the same time.
 - i. Timeline: Chiquita estimates that the 2 new BTEX monitors will be online by August 31 and that it will complete its initial evaluation by mid-October.

3. Conduct frequent and additional volatile organic compound (“VOC”) and odor sampling at residential locations where recent odor complaints have been reported (i.e., Val Verde, Live Oak, and Hasley Canyon).

As a part of the enhanced and expanded air monitoring program described in response to recommendation #2, Chiquita will begin collecting grab samples for all of the constituents listed in recommendation #2 at residential locations where recent odor complaints have been reported.

- a. Locations to be sampled: Chiquita has reached out to SCAQMD for complaint data from recent odor complaints including intersections where complaints have been reported. Once Chiquita receives this list of addresses from SCAQMD, it will determine the appropriate number and location of these residential locations. Chiquita anticipates adding 3 to 4 sampling locations based on odor complaint locations (in addition to the 12 existing air monitoring station locations) including in Val Verde, Live Oak, and Hasley Canyon. The final number and location of sampling locations will depend on the SCAQMD complaint data.
 - i. Timeline: Chiquita will begin collecting at 3 to 4 additional off-site locations following the timeline listed above in response to recommendation #2a (the week of August 14). However, SCAQMD has reported that it may be several weeks until it can get the redacted complaint data to Chiquita, so the initial locations selected will not have the benefit of this information. Chiquita anticipates revising the off-site collection locations, and potentially adding collection locations, after receipt and analysis of the SCAQMD complaint data.

4. Conduct frequent and additional VOC and odor sampling at on-site locations.

As a part of the enhanced and expanded air monitoring program described in response to recommendation #2, Chiquita will begin collecting grab samples for all of the constituents listed in recommendation #2 at on-site locations where higher odor levels are detected, including but not limited to the reaction area and working face.

- a. Locations to be sampled: Chiquita anticipates adding 2 to 3 additional on-site sampling locations including the reaction area, the working face, and any other on-site locations where higher odor levels are detected.
 - i. Timeline: Chiquita will implement this additional sampling on the same timeline listed above in response to recommendation #2a (the week of August 14).

5. Conduct a flux chamber study.

Chiquita is discussing this testing with the SCS flux chamber team, which is preparing a proposal, schedule, and work plan. Chiquita will seek review and input by the TAC Toxicology Consultant prior to conducting the study.

- i. Timeline: Chiquita expects to have a work plan from the SCS flux chamber team by August 25 and expects that the study will occur by the end of August. Expedited results from the study should be available within 4 weeks of study completion.

6. Report all monitoring results to the County.

Chiquita will provide data on a monthly basis and quarterly reports on the expanded and enhanced monitoring discussed above in response to recommendation numbers 1-4.

Chiquita will also provide the results of the flux chamber study.

- a. Monthly data: Chiquita will submit data on a monthly basis, 3 weeks after the end of the month (i.e., on the 21st of each month), to allow for sufficient time for quality assurance/quality control (“QA/QC”). Chiquita anticipates submitting the first monthly report on September 21, with any August data, but the report may not include all elements, particularly continuous monitoring, which as discussed above will likely be a work in progress at that time.
- b. Quarterly reports: Chiquita will submit summary reports on a quarterly basis, 45 days after the end of the quarter, to allow for sufficient time for QA/QC and analysis of the last month’s data. These summary reports will include analysis and comment from the TAC Toxicology Consultant. Chiquita anticipates submitting quarterly reports on the following timeline. The first quarterly report is anticipated to be submitted on November 15, but, due to timing, it will not include a full quarter’s worth of data.
 - i. Q3: July-September, submitted November 15
 - ii. Q4: October-December, submitted February 15
 - iii. Q1: January-March, submitted May 15
 - iv. Q2: April-June, submitted August 15
- c. Flux chamber study: Chiquita will submit the results of the flux chamber study by October 15, 2023.
- d. Air monitoring data already available:
 - i. All quarterly and annual reports generated as part of the Condition 68 Community Air Monitoring Program are available on Chiquita’s Odor Mitigation webpage (<https://chiquitacanyon.com/reports/odor-mitigation/>).

1. All data collected under this program is obtained from a network of 12 air monitoring stations (discussed above), with 7 stations located throughout the community surrounding the Landfill and 5 stations located on-site around the Landfill perimeter. These air monitoring stations continuously monitor particulate matter with an aerodynamic diameter of 10 micrometers or less (“PM₁₀”), particulate matter with an aerodynamic diameter of 2.5 micrometers or less (“PM_{2.5}”), and H₂S, as well as wind direction and wind speed.
 2. In addition to this continuous monitoring, on a monthly basis, Chiquita collects 3 grab samples in the community and analyzes them for the SCAQMD Rule 1150.1 Table 1 constituents.
- ii. All quarterly reports generated as part of Chiquita’s SCAQMD Rule 1150.1 monitoring program are available on Chiquita’s Landfill Reports webpage (<https://chiquitacanyon.com/reports/landfill-reports/>). This monitoring program includes monthly instantaneous surface monitoring, monthly integrated surface sampling, quarterly ambient air monitoring, monthly perimeter gas probe monitoring, quarterly perimeter probe sampling, quarterly gas collection system sampling, and continuous wind speed and direction monitoring.

7. **Additional actions.**

In addition to the mitigation efforts detailed above and in Chiquita’s July 27, 2023 Condition 69 Report and August 1, 2023 response to Public Health, Chiquita is taking the following actions:

- a. Geosynthetic Cover Installation: Chiquita is in the process of designing and will install geosynthetic cover over the reaction area of the Landfill to limit the migration of odors from the site. The geosynthetic cover will cover approximately 30 acres of the Landfill.
 - i. Timeline: Chiquita anticipates completing the design for the geosynthetic cover by August 25. Chiquita will then obtain and install the material, which may take more than 6 weeks to complete.
- b. Portable Thermal Oxidizer: Chiquita is looking for more portable thermal oxidizers (“TOX”) or rental flares for additional gas control capacity, in addition to the TOX that is currently in use.
 - i. Timeline: This work is ongoing. If Chiquita is able to locate another TOX or rental flare, it will provide an update on the timing for when it can be brought on site.
- c. Local Resident Air Filter Program: Chiquita purchased a number of in-home air filtration devices and is currently distributing them upon request to those community members closest to the Landfill and affected by odors. To receive an air filtration device, community members complete a simple form which is available on Chiquita’s website and which Chiquita has distributed to the community via email and flyers directly to residents. To pick up a device,

community members go to Los Angeles County Fire Station 143 during certain morning and afternoon hours that Chiquita has communicated broadly and that are posted on Chiquita's webpage. Chiquita will also deliver devices to the homes of seniors or those not physically able to pick up a device.

- i. Timeline: The program launched on August 9. As of the date of this letter, over 162 filters have been picked up by local residents or delivered to homes and another 370 filters have been requested. The program will continue as long as there are requests for filters.
- d. Enhanced Community Engagement: Chiquita has also ramped up its community engagement.
 - i. Chiquita is regularly maintaining its Odor Mitigation webpage (<https://chiquitacanyon.com/reports/odor-mitigation/>) with status updates, reports sent to SCAQMD and County agencies, upcoming public meetings, and more.
 - ii. On August 10, Chiquita held its first Community Information Meeting online, providing attendees with an update on the recent issues and Chiquita's many mitigation efforts, and giving the public an opportunity to provide comments and ask questions. Chiquita's next online meeting is scheduled for September 12, 2023. Date, time, and Zoom information for these online meetings will be made available on Chiquita's Odor Mitigation webpage.
 - iii. Chiquita will also be attending other community meetings, including the August 15 Community Advisory Committee meeting and the August 16 Castaic Area Town Council meeting, to provide updates and answer questions.

Please contact me should you have any questions about this response.

Sincerely,



Steve Cassulo
District Manager
Chiquita Canyon, LLC

cc: Victor Yip, South Coast Air Quality Management District
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