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November 20, 2025

**Via Electronic Correspondence**

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

**SUBJECT: LEA COMMENTS ON THE RESPONSE LETTERS AND THE DRAFT REMOVAL ACTION WORKPLAN TO ADDRESS THE EXTENSION OF COVERED AREA SUBMITTED BY CHIQUITA CANYON LANDFILL (CCL), SWIS NO. 19-AA-0052**

Dear Mr. Cassulo,

The Los Angeles County Department of Public Health, Solid Waste Management Program, acting as the Local Enforcement Agency (LEA), is responding the following three (3) submittals received from Chiquita Canyon Landfill’s (CCL) addressing the LEA’s May 1, 2025, Compliance Order (Order), Section 4.1:

- **“CCL’s Response to U.S. EPA’s, DTSC’s, and the LEA’s Requirement to Expand the Geomembrane Cover,”** dated August 15, 2025. This letter served as CCL’s response to the U.S. Environmental Protection Agency’s (EPA) July 24, 2025 letter titled *“Additional Work required under UAO for Geomembrane Cover Expansion.”* The submittal also addressed the Department of Toxic Substances Control (DTSC) April 1, 2025 Imminent and Substantial Endangerment Order, and the LEA’s May 1, 2025 Compliance Order requiring expansion of the geomembrane cover.

- **“Response to LEA Comments on the DRAFT RAW: Extension of Covered Area, for May 1, 2025 Compliance Order Mitigation Measure 4.1,”** dated August 18, 2025. This letter served as CCL’s response to the LEA’s August 1, 2025 comment letter on the *“Draft Removal Action Workplan (Draft RAW): Extension of Covered Area,”* dated May 2025, prepared by Civil and Environmental Consultants, Inc. (CEC).
  
- **“Revised Draft Removal Action Workplan (Revised RAW): Extension of Covered Area,”** dated October 2025. This document, prepared by CEC, was submitted to address Section 4.1 of the LEA’s Order.

CCL’s response letters and the Draft RAW propose to install additional geomembrane cover in five-acre segments, which CCL asserts would effectively control emissions while minimizing disturbance to the landfill gas control system. CCL further proposed to discontinue the installation during the rainy season and instead, conduct repairs to the existing geomembrane cover. CCL’s estimated installation schedule did not have a completion date and is described as “To Be Determined,” allowing for adjustments based on field conditions and unforeseen delays.

The LEA, in consultation with the California Department of Resources Recycling and Recovery (CalRecycle), has determined these submittals are unacceptable. Furthermore, since CCL has failed to install a vertical soil barrier and the reaction continues to expand, the LEA’s current directive is for CCL to install the approved geomembrane cover over all areas to which the reaction has expanded or has the potential to expand as stated in Section 4.1 of LEA’s Order. The entire facility where waste is disposed (Main Canyon waste management area) shall be covered by August 31, 2026. As part of compliance with Section 4.1, CCL must also:

1. By December 15, 2025, provide an estimated schedule for the 60 ml geomembrane cover installation, with final completion of no later than August 31, 2026.
2. Employ the necessary resources to complete geomembrane coverage over the entire facility where waste is disposed (Main Canyon waste management area) by August 31, 2026.
3. Continue to install the required geomembrane cover during the winter months to ensure completion within the required timeframe, as CCL has done previously.

The LEA reserves the right to issue a new directive or order if site conditions or available data indicate that additional corrective actions are necessary to protect public health and the environment.

Ensure to obtain all permits and approvals from Federal, State and Local agencies as required by the law and regulations.

Mr. Steve Cassulo  
November 20, 2025  
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If you have any questions, please email me at [emorofuji@ph.lacounty.gov](mailto:emorofuji@ph.lacounty.gov) or call me at (213) 668-2206.

Sincerely,



Eric Morofuji, EHS III  
Solid Waste Management Program  
Local Enforcement Agency (LEA)

Enclosed: CalRecycle comment letter for Directive 4.1 – Expansion of the Geomembrane Cover Schedule dated October 3, 2025.

Cc: (Via Electronic Correspondence Only)

- Robert Ragland, Los Angeles County Department of Public Health
- Liza Frias, Los Angeles County Department of Public Health
- Azar Kattan, J.D., M.P.H, Los Angeles County Department of Public Health
- Ken Habaradas, Los Angeles County LEA
- Karen Gork, Los Angeles County LEA
- Renee Jensen, LEA Counsel ([rjensen@bgsplaw.com](mailto:rjensen@bgsplaw.com))
- Blaine McPhillips, Senior Deputy County Counsel
- Emiko Thompson, Los Angeles County Department of Public Works
- Alex Garcia, Los Angeles County Department of Regional Planning
- Ai-Viet Huynh, Los Angeles County Department of Regional Planning
- Wes Mindermann, CalRecycle ([wes.mindermann@calrecycle.ca.gov](mailto:wes.mindermann@calrecycle.ca.gov))
- Todd Thalhamer, CalRecycle ([todd.thalhamer@calrecycle.ca.gov](mailto:todd.thalhamer@calrecycle.ca.gov))
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- Jeff Lindberg California Air Recourses Board ([jeff.lindberg@arb.ca.gov](mailto:jeff.lindberg@arb.ca.gov))
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- Amy Miller, United States Environmental Protection Agency ([Miller.Amy@epa.gov](mailto:Miller.Amy@epa.gov))
- Joel Jones, United States Environmental Protection Agency ([Jones.Joel@epa.gov](mailto:Jones.Joel@epa.gov))
- Peter Ruttan, Department of Toxic Substances Control ([Peter.Ruttan@dtsc.ca.gov](mailto:Peter.Ruttan@dtsc.ca.gov))



October 3, 2025

Via Email: kgork@ph.lacounty.gov

Karen Gork  
Chief Environmental Health Specialist  
Los Angeles County Department of Public Health  
5050 Commerce Drive  
Baldwin Park, California 91706

**Subject: Chiquita Canyon Landfill (19-AA-0052) Technical Review – Directive 4.1,  
Expansion of the Geomembrane Cover Schedule and Directive 4.2  
Relocation of Tank Farm 9 at Chiquita Canyon Landfill**

Dear Ms. Gork:

CalRecycle staff is providing this letter in response to your request for technical assistance in the proposed schedule for the additional geomembrane cover and relocation of Tank Farm 9.

The following comments are provided to the Los Angeles County Department of Public Health [Local Enforcement Agency (LEA)] as assistance to support the program in carrying out its responsibilities at permitted disposal sites. The final determination as to the comments to be 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 Title 14, California Code of Regulations (14 CCR), Division 7, 27 CCR, Division 2, Subdivision 1 (Section 20005 et seq.), and Division 30 of the Public Resources Code.

#### **Directive 4.1 Comments**

CalRecycle staff have reviewed the proposed Chiquita Canyon Landfill (CCL) Proposed Cover Installation and Repair Plan for Directive 4.1 and find it inadequate. Since CCL has chosen not to install any barriers in the main fill, the Subsurface Elevated Temperature (SET) Event has the potential to expand to the entire waste area. CCL's current strategy of using an unproven heat exchange and pressure control methodology is not preventing the SET from expanding or controlling the emissions and/or odors at the facility. According to the South Coast Air Quality Management District, the facility has received over 4,600 complaints and 80 Notices of Violation since January 1, 2025. The SET Event continues to expand and impact the community.

Karen Gork  
October 3, 2025  
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CalRecycle staff recommends that the LEA consider requiring the entire Main Canyon Fill waste management unit to be covered by July 1, 2026. The CCL has previously demonstrated its ability to install a geomembrane liner during the winter months, and it should continue this approach. Currently, the CCL is using only one drill rig and one liner crew; the CCL should employ the necessary resources to complete the entire waste area within the recommended timeframe.

#### **Directive 4.2 Comments**

The CCL relocated the hazardous waste treatment and leachate storage facility, known as Tank Farm 9, from the top deck to the bottom of the facility at Cell 8B. CalRecycle staff have provided comments for consideration to the Department of Toxic Substances Control (DTSC) regarding this temporary location. CalRecycle staff consider the current location temporary and susceptible to being affected by the current and future SET Events, which may require relocating the facility again. CalRecycle staff recommends that the LEA consider requiring the CCL to take the necessary actions as soon as practicable to establish a permanent location for the leachate treatment facility (Tank Farm 13) that will not be impacted by the current and future SET Events.

If you have comments or questions, please call (916) 341-6356 or email [Todd.Thalhamer@Calrecycle.ca.gov](mailto:Todd.Thalhamer@Calrecycle.ca.gov).

Sincerely,



Todd Thalhamer, P.E.  
Senior Waste Management Engineer  
Engineering Support Branch

Cc Via Email:

Peter Ruttan, Department of Toxic Substances Control ([Peter.Ruttan@dtsc.ca.gov](mailto:Peter.Ruttan@dtsc.ca.gov))  
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