

October 30, 2024

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

Subject: Response to South Coast Air Quality Management Stipulated Order for Abatement in Case No. 6177-4 Condition 66(a)(iv)
Chiquita Canyon Landfill, Castaic, California

Dear Mr. Cassulo,

On behalf of Chiquita Canyon, LLC (Chiquita), SCS Engineers (SCS) hereby submits this letter in response to Condition No. 66(a)(iv) in the Stipulated Order for Abatement in Case No. 6177-4 (SOFA) with the South Coast Air Quality Management District (South Coast AQMD). Condition No. 66(a)(iv) states:

- iv. *Respondent shall submit the findings and solutions to issues documented in Condition 66(a)(ii) and (iii), which shall include any additional communication from contacting various vendors, manufacturers, or distributors of systems, components, and devices by no later than October 30, 2024, or unless otherwise approved by South Coast AQMD, to [Baitong Chen, Air Quality Engineer, (bchen@aqmd.gov); Nathaniel Dickel, Senior Air Quality Engineer, (ndickel@aqmd.gov), and Christina Ojeda, Air Quality Inspector, (cojeda@aqmd.gov)].*
1. *The findings and solutions shall also include an inventory of the vertical wells in the Initial Reaction Area that contain a Lorenz pump capable of measuring liquid levels and down-well temperatures, including the location of the vertical wells and the depth of the down-well temperature probes. The findings and solutions shall also include an inventory and installation timeline of the temperature monitoring probe network approved by the U.S. Environmental Protection Agency under the Unilateral Administrative Order.*

Based on the Reaction Committee's recommendations and issues identified in the April 19, 2024 submission to the South Coast AQMD titled "LFG Wellfield Automated Remote Monitoring Plan", and upon further analysis, SCS implemented the initial pilot program for the six (6) wells to evaluate the feasibility of the remote monitoring system. The original design for the six (6) pilot remotely monitored landfill gas wells to meet the original requirements of the SOFA included the following key system components:

- Component 1: three (3) down-well thermocouples to measure temperature at varying depths;
- Component 2: one (1) down-well level transducer to measure liquid level within the well;
- Component 3: one (1) top-mounted pressure transducer to measure vacuum applied to the wellhead;
- Component 4: one (1) industrial cellular IIoT device to gather data from the sensors and transmit it to SCS' cloud-based Supervisory Control and Data Acquisition system for remote monitoring, alarming, and reporting;

- Component 5: two (2) remote input cards to gather data from the sensors and transmit it to the IIoT device; and
- Component 6: one (1) solar power system to source 12-VDC for the sensors and IIoT device

Additional analysis and correspondence concerning the original design for the remote monitoring system and associated issues and concerns were described in Chiquita's September 17, 2024 submission to the South Coast AQMD titled "Response to the South Coast Air Quality Management Stipulated Order for Abatement in Case No. 6177-4 Condition 66(a)(ii)", and in Chiquita's October 11, 2024 submission to the South Coast AQMD titled "Response to the South Coast Air Quality Management Stipulated Order for Abatement in Case No. 6177-4 Condition 66(a)(iii)".

SCS has no additional findings or solutions concerning the issues documented in the Condition 66(a)(ii) and (iii) submittals or prior submittals with respect to the original design of the remote monitoring system. In addition, SCS has received no additional communication from vendors, manufacturers, or distributors of RMS-related systems, components, or devices since those communications were received and included with the October 11, 2024 submission to South Coast AQMD.

However, after revisions to the SOFA on August 27, 2024, and the corresponding revisions to the SOFA's remote monitoring system requirements, SCS believes there are no remaining issues or needed solutions to install and begin operating the 20 temperature monitoring devices in wells pursuant to Condition 66(a)(v) by December 31, 2024.

An inventory/map showing the locations of all vertical wells with Lorentz pumps currently installed that are capable of measuring liquid levels and down-well temperatures including the location of vertical wells and temperature probes as well as the depth of the temperature probes is attached. Additionally, Chiquita has ordered and plans to install an additional 45 Lorentz pumps capable of measuring liquids levels and down-well temperatures in verticals wells that are still to be determined.

Additionally, Chiquita has commenced the installation of 15 additional temperature monitoring probes to be constructed utilizing sonic drilling. While sonic drilling takes longer than traditional bucket auger drilling, it is capable of reaching depths within the Chiquita Canyon Landfill with a lower risk of collapse of the borehole. An estimated timeline for installation of the additional temperature monitoring probe network shared with the U.S. Environmental Protection Agency under the Unilateral Administrative Order is provided below. The attached inventory/map shows the locations of the installed and proposed temperature monitoring probes:

Task	Estimated Date of Completion
Mobilization of Sonic Drill Rig	November 6, 2024
Completion of drilling all 15 Temperature Monitoring Probes	February 14, 2025
Installation of sensors and commissioning of all 15 Temperature Monitoring Probes	March 21, 2025

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

Sincerely,

A handwritten signature in black ink, appearing to read "Sam Dean". The script is fluid and cursive.

Sam Dean
Senior Project Manager, SCS RMC
SCS Engineers

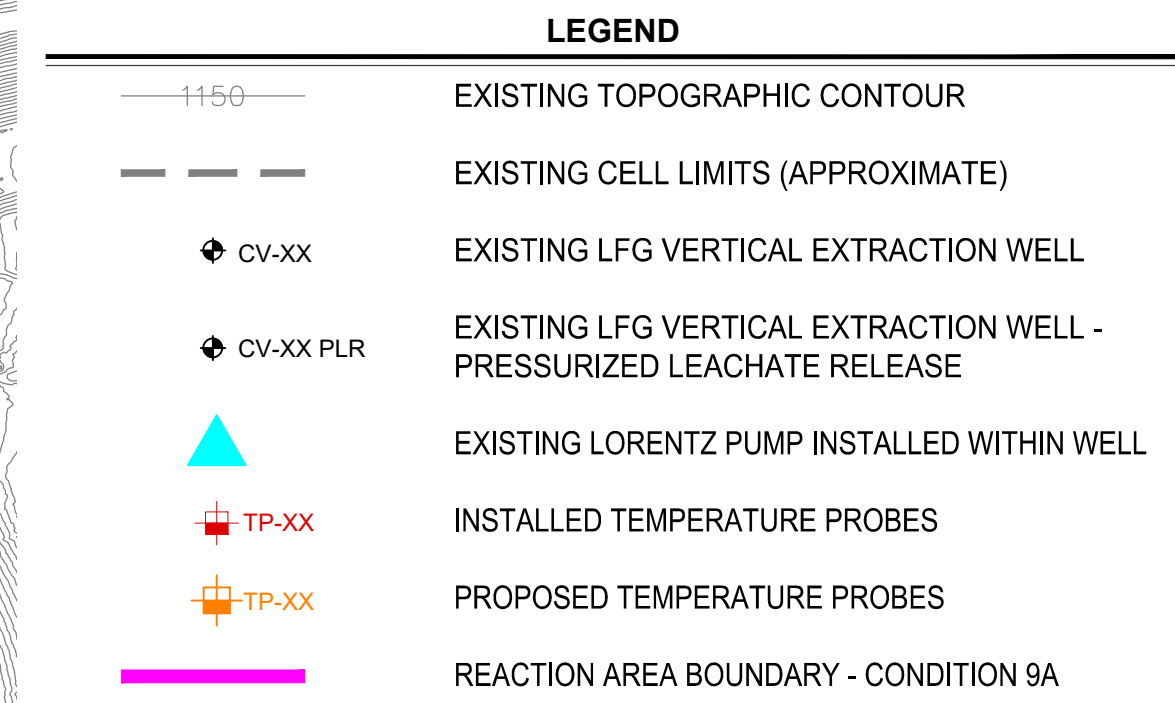
A handwritten signature in black ink, appearing to read "Bill Haley". The script is fluid and cursive, with a long horizontal stroke at the end.

Bill Haley
Project Director, PE
SCS Engineers

CC:

Nicole Ward, Chiquita Canyon, LLC
Amanda Froman, Chiquita Canyon, LLC
Baitong Chen, South Coast AQMD
Nathaniel Dickel, South Coast AQMD
Christina Ojeda, South Coast AQMD

ATTACHMENTS



Temp. Probe I.D.	As-Built Temp. Probe Depth (Ft.)
TP-1	125
TP-2	66
TP-3	55
TP-4	75
TP-5	77
TP-6	122
TP-7	123
TP-8	180
TP-9	141
TP-10	130
TP-11	157
TP-12	190
TP-13	166
TP-14	157
TP-15	170
TP-16	117
TP-17	135
TP-18	90
TP-19	155
TP-20	97

GENERAL DRAWING NOTES:

1. EXISTING TOPOGRAPHIC SURVEY INFORMATION SHOWN WAS PROVIDED BY PROPELLOR. AERIAL PHOTOGRAPHY DATED OCTOBER 23, 2024.
2. NORTH ARROW SHOWN HERE IS REFERENCE TO THE CALIFORNIA STATE PLANE ZONE V COORDINATE SYSTEM, NAD 83.
3. THE LOCATION OF ANY EXISTING PIPING, VALVES, TIE-IN LOCATIONS AND OTHER FEATURES ARE APPROXIMATE AND SHOULD BE USED FOR INFORMATION PURPOSES ONLY. ACTUAL FIELD CONDITIONS MAY VARY AND SUBJECT TO CHANGE BASED ON FUTURE FILL OPERATIONS, WASTE PLACEMENT, TOPOGRAPHIC FEATURES, AND OTHER SITE-SPECIFIC FACTORS.
4. EXISTING GCCS AS-BUILT DATED OCTOBER 25, 2024.

DATE														
REVISION														
NO.		1												
PROJECT TITLE:		CHIQUITA CANYON LANDFILL CASTAIC, CALIFORNIA												
TEMPERATURE PROBES, AND LORENTZ PUMPS														
VERTICAL LFG EXTRACTION WELLS;														
PROJECT TITLE:		CHIQUITA CANYON LANDFILL CASTAIC, CALIFORNIA												
														
SUS ENGINEERS ENVIRONMENTAL CONSULTANTS 8798 BALBOA AVENUE SUITE 230 SAN DIEGO, CA 92123 (658) 571-5500 FAX: (562) 427-0805														
DATE: 10/30/2024														
SCALE: AS SHOWN														
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