

Milestones Required by the June 6, 2024 LEA Compliance Order

Milestone #	Key Action	Start Date/Deadline	Status
1A-1	Submit a revised soil reaction break/barrier plan	November 26, 2024	Completed; submitted on November 26, 2024; LEA responded on December 24, requesting additional information to complete its technical review; provided the additional information on January 24, 2025
1A-2	Submit a revised report with CO and H2 readings for all gas collection wells in the reaction area and wells 200 feet outside the reaction area	June 11, 2024	Completed; see report on Chiquita's website
1A-3	Submit lab test results for all monthly LFG sampling (including CO and H2) from a set of LFG wells selected by the LEA	September 16, 2024; monthly by the 15th of the month	Ongoing; received clarification from LEA on certain items on November 19, 27, and December 3, 2024; awaiting further input from LEA; see monthly reports on Chiquita's website
1B-1	Submit a revised Completion Report for the installation of the temperature monitoring probes	June 11, 2024	Completed; see report on Chiquita's website
1B-2	Submit weekly temperature monitoring probe data reports	June 7, 2024; weekly, every Thursday	Ongoing; including updates on status of Chiquita's installation of additional temperature monitoring probes in response to December 24 letter from LEA; see weekly reports on Chiquita's website
1B-3	Provide a temperature contour map showing color-coded observations based on the maximum observed temperature collected during the month	June 15, 2024; monthly by the 15th of the month	Ongoing; see monthly maps on Chiquita's website
1B-4	Install three temperature probes around the area that is extending south into areas outside of the previously defined reaction area	July 11, 2024 – on hold pending discussions with the LEA	LEA is no longer requiring Chiquita to install the three TMPs described in the Compliance Order, according to LEA letter dated January 10, 2025, based on its review of TMP data and on the installation of the 15 TMPs described in the revised soil reaction break/barrier plan

2A-1	Install the 30-mil HDPE geosynthetic cover over the 30-acre reaction settlement area and around any wells showing signs of reaction	January 17, 2025	Completed; Final Completion Report submitted on January 17, 2025; updates no longer required
2A-2	Provide weekly updates on the geosynthetic cover installation	June 14, 2024; weekly, every Friday	Completed; LEA no longer requires this status update because the geosynthetic cover has been fully installed
2B	Submit weekly cover reports tracking issues with the landfill soil and geosynthetic cover as well as settlement and stability concerns	Weekly, every Tuesday	Ongoing; see weekly updates on Chiquita's website; received related requests from LEA for FLIR surveys and LiDAR maps; under discussion with LEA
3-1	Ensure slope stability issues are included in the weekly cover reports	Weekly, every Tuesday	Ongoing; see weekly updates on Chiquita's website
3-2	Submit a west and north slope stability analysis final report that addresses LEA's comments	No longer required	LEA is no longer requiring Chiquita to submit the final report according to LEA letter dated September 17, 2024
4-1	Install and operate an additional 107 LFG extraction wells as per approved February 26, 2024 Remediation Plan for LFG Exceedance	July 31, 2024	Completed
4-1	Notify the LEA upon completion of installation and operation of additional 107 LFG extraction wells	July 31, 2024	Completed
4-1	Provide a final completion report for the 107 LFG wells	July 31, 2024	Completed; see report on Chiquita's website
4-2	Submit weekly status updates on the installation of the LFG extraction wells	Weekly, every Wednesday – no longer required	Completed; this status update is no longer required under the June 6, 2024 Compliance Order and the LEA letter dated May 8, 2024 because the 107 LFG extraction wells listed in the February 26, 2024 Remediation Plan have been installed
4-3	Submit weekly results of methane readings at wells GP-13 and GP-15	Weekly, every Wednesday	Ongoing; see weekly results on Chiquita's website
4-4	Demonstrate compliance with 27 CCR Section 20921 within the 120-day	November 28, 2024 (120 days after completion of the	In progress; extension requested on September 25, 2024, and, in response to LEA input, extension

	compliance period that begins after the completion of the planned LFG extraction well construction referred to in the February 2024 Remediation Plan	LFG extraction well installation)	requested again together with additional proposed measures as part of a Revised Remediation Plan submitted on November 18; additional information requested by LEA on February 21, 2025
5	Submit monthly report with maps showing defined reaction area, expansion of reaction area if any, weekly temperature monitoring probe data, settlement with heat maps, and LFG data including but not limited to CO and H2 data	September 16, 2024; monthly by the 15th of the month	Ongoing; see monthly reports on Chiquita's website