



CHIQUITA CANYON

A Waste Connections Company

January 30, 2026

Via E-Mail

Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force
c/o County of Los Angeles Public Works
Environmental Programs Division
P.O. Box 1460
Alhambra, CA 91802-1460
taskforce@dpw.lacounty.gov
csaucillo@dpw.lacounty.gov

Re: Chiquita Canyon, LLC's Monthly Update to the Integrated Waste Management Task Force

Dear Members of the Integrated Waste Management Task Force:

Chiquita Canyon, LLC ("Chiquita") received a letter from the Integrated Waste Management Task Force (the "Task Force") dated April 19, 2021. The Task Force's letter requests that Chiquita provide monthly updates concerning a Notice of Violation ("NOV") that the County of Los Angeles Department of Regional Planning ("DRP") issued to Chiquita on June 11, 2020. The NOV alleges non-compliance with Conditions 68, 77, 79, and 113 of Chiquita's Conditional Use Permit ("CUP"). Chiquita previously provided monthly updates to the Task Force from April 2021 through December 2025. This letter serves as Chiquita's monthly update for January 2026.

On December 2, 2021, the County of Los Angeles Public Works ("PW") requested that these monthly updates include additional details concerning any NOVs issued by regulatory agencies and Chiquita's actions to mitigate those NOVs. This letter provides additional details concerning the NOVs issued since the last monthly update and Chiquita's actions to mitigate those NOVs.

On August 15, 2022, PW requested that these monthly updates clearly indicate whether or not Chiquita received an NOV from any regulatory agencies during the reporting month and, if so, that Chiquita include a copy of the NOV as an attachment to the letter. Since the last monthly update:

- Chiquita received four NOVs from the South Coast Air Quality Management District ("SCAQMD") for alleged violations of SCAQMD Rule 402 and California Health &

Safety Code (“HSC”) § 41700 dated from January 2 through January 23, 2026. Copies of these NOV’s are provided in Attachment A.

- On January 6, 2026, Chiquita received an NOV from the Los Angeles Regional Water Quality Control Board (“Water Board”), which was revised on January 7, 2026, for alleged violations of National Pollutant Discharge Elimination System (“NPDES”) General Permit for Stormwater Discharges Associated with Industrial Activities (Order No. 2014-0057-DWQ, as amended by Order No. 2018-0028-DWQ) (“General Permit”) Sections III.B and III.C. A copy of the revised NOV is provided in Attachment B.
- On January 14, 2026, Chiquita received NOV #P82507 dated November 14, 2025, from SCAQMD for alleged violations of SCAQMD Rules 3002(c)(1) and 42401; Section D, Permit G43917, Conditions 2 and 3 and Section K, Condition 8 of Chiquita’s Title V Permit; and Condition Nos. 15, 24, and 25 of the Stipulated Order for Abatement in Case No. 6177-4 (“Stipulated Order”). A copy of this NOV is provided in Attachment C.
- On January 15, 2026, Chiquita received NOV #P82508 dated December 22, 2025, from SCAQMD for alleged violations of HSC§ 42401 and Stipulated Order Condition No. 34(c). A copy of this NOV is provided in Attachment D.

On October 16, 2023, the Facility and Plan Review Subcommittee requested that these monthly updates include a detailed update on the status of Chiquita’s compliance with its Stipulated Order with SCAQMD and any other mitigation measures imposed by other regulatory agencies. Detailed information on Chiquita’s implementation of the Stipulated Order can be found in the chart provided in Attachment E. Detailed information on Chiquita’s implementation of the Local Enforcement Agency’s (“LEA”) June 6, 2024 and May 1, 2025 Compliance Orders can be found in the chart provided in Attachment F. Detailed information on Chiquita’s implementation of the U.S. Environmental Protection Agency’s (“EPA”) February 21, 2024 Unilateral Administrative Order (“UAO”) can be found in the chart provided in Attachment G. Detailed information on Chiquita’s implementation of the DTSC April 2, 2025 Imminent and Substantial Endangerment (“ISE”) Order can be found in the chart provided in Attachment H.

On October 2, 2025, PW requested that these monthly updates include status updates on the NOV’s issued by PW and DRP on June 26, 2025 and July 14, 2025, respectively. This letter provides additional details regarding the PW and DRP NOV’s, as applicable.

June 2020 DRP NOV

Chiquita has no updates on the June 2020 DRP NOV.

SCAQMD Rule 402 NOV’s

The SCAQMD Rule 402 NOV’s were issued due to odors that allegedly emanated from the Chiquita Canyon Landfill (the “Landfill”). Any odors coming from the Landfill are related to an

abnormal biotic or abiotic process (also known as a landfill reaction) taking place deep within a lined, but older and inactive portion of the Landfill waste mass. More information on the landfill reaction, recent air monitoring data, and analyses from Chiquita's toxicologists can be found on Chiquita's Odor Mitigation website, here: <https://chiquitacanyon.com/odor-mitigation/>.

On September 6, 2023, Chiquita entered into a Stipulated Order with SCAQMD to address the NOV's issued by SCAQMD inspectors as a result of the landfill reaction, alleging violations of SCAQMD Rule 402 and HSC § 41700. This Stipulated Order has since been modified on January 17, March 21, April 24, August 27, November 13, 2024, April 16, 2025, June 24, and December 9, 2025.¹

More information on Chiquita's implementation of the Stipulated Order can be found in Chiquita's monthly reports to SCAQMD, which are posted on Chiquita's Odor Mitigation website, and in the chart provided in Attachment E.

June 26, 2025 PW NOV's (Accessor's IDs #3271-002-013, #3271-002-019, and #3271-002-041)

On June 26, 2025, Chiquita received three NOV's from PW alleging that Chiquita had engaged in grading without obtaining a grading permit in accordance with the Los Angeles County Code. Chiquita appealed these NOV's to PW on August 28, 2025. The appeal states all three NOV's are unsupported and should be rescinded. Chiquita did not violate the County Building Code, it applied for a grading permit from PW in good faith cooperation with the County, and PW's permitting requirements are preempted by state law. As of January 30, 2026, Chiquita's appeal has not yet been set for a hearing, and Chiquita has not received a response to its appeal.

July 14, 2025 DRP NOV (Code Enforcement Case No. RPZPE2025004826)

On July 14, 2025, Chiquita received an NOV from DRP alleging violations of CUP Conditions 12, 54, and 56. Chiquita appealed this NOV to DRP on September 12, 2025. The appeal states DRP's NOV is based entirely on PW's June 26, 2025 NOV's, referenced above, and because the PW NOV's are unwarranted, DRP's NOV is unsupported and should be rescinded. Chiquita has not violated CUP Conditions 12, 54, or 56, and DRP's NOV is unnecessarily punitive and violates Chiquita's due process rights. On September 23, 2025, DRP responded to Chiquita's appeal, setting an October 21, 2025 hearing date. Chiquita replied on September 25, 2025, reiterating its request that any hearing on DRP's NOV post-date a final determination on Chiquita's appeal of the PW NOV's. In a staff report that DRP submitted to the Hearing Officer and shared with Chiquita on October 9, 2025, DRP staff agreed. On October 20, 2025, DRP continued the hearing to January 20, 2026. On January 2, 2026, County Counsel and Chiquita jointly requested a further continuance of the hearing to May 5, 2026, as the hearing on Chiquita's appeal of the PW NOV's had not yet been scheduled. Regional Planning staff

¹ A copy of the December 9, 2025 Stipulated Order will be provided once available to Chiquita.

submitted a supplemental report to the Hearing Officer requesting the continuance on January 5, 2026. On January 20, 2026, the Hearing Officer granted the continuance to May 5, 2026.

January 7, 2026 Water Board NOV

On January 6, 2026, Chiquita received an NOV from the Water Board, which was revised on January 7, 2026, for alleged violations of General Permit Sections III.B and III.C. The NOV relates to Chiquita allegedly discharging leachate comingled stormwater from the East Basin to Castaic Creek. Chiquita is reviewing this NOV and will provide a response to the alleged violations. This response will be posted on Chiquita's Odor Mitigation website.

SCAQMD NOV #P82507

On January 14, 2026, Chiquita received NOV #P82507 dated November 14, 2025, from SCAQMD for alleged violations of SCAQMD Rules 3002(c)(1) and 42401; Section D, Permit G43917, Conditions 2 and 3 and Section K, Condition 8 of Chiquita's Title V Permit; and Stipulated Order Condition Nos. 15, 24, and 25. The NOV specifically alleges that Chiquita: (1) "[f]ailed to properly maintain and keep equipment in good operating condition at all times"; (2) "[f]ailed to operate and maintain equipment by personnel properly trained in its operation"; (3) "[f]ailed to comply with all regulatory requirements and permit terms and conditions"; (4) "[f]ailed to comply with all conditions under the landfill gas collection system permit"; (5) "[f]ailed to prevent standing leachate and the pooling or ponding of leachate exposed to atmosphere throughout the facility. Failed to immediately collect and contain leachate in a sealed tanker truck or tank; or, failed to timely conduct repairs that would redirect leachate into the leachate collection system"; and (6) "[f]ailed to mitigate odors and the dispersion and exposure of leachate into the atmosphere, to the maximum extent possible." Chiquita is still evaluating the alleged violations and can provide further explanation in follow-up reporting as appropriate.

SCAQMD NOV #P82508

On January 15, 2026, Chiquita received NOV #P82508 dated December 22, 2025, from SCAQMD for alleged violations of HSC § 42401 and Stipulated Order Condition No. 34(c). The NOV specifically alleges that Chiquita "[f]ailed to provide automatic electronic notification via email for exceedance of acute 1-Hour OEHHA REL [(Reference Exposure Level)] for benzene in real-time, and failed to provide an automatic electronic notification after the applicable weighted average fell below the applicable REL."

With regard to the absence of REL exceedance notifications, upon investigation, it appears that the absence of a public notification was due to automated flagging of the exceedance data as "under review" as a component of recent quality assurance/quality control ("QA/QC") upgrades to data flagging on the application programming interface for the micro-GCs. The alert system has been updated to recognize exceedances, including those flagged with the updated data qualifiers.

Integrated Waste Management Task Force
c/o Los Angeles County Public Works
January 30, 2026
Page 5 of 5

Chiquita looks forward to continuing to provide the Task Force with updates on the June 11, 2020 NOV and any NOVs issued by regulatory agencies. Should you have any questions, please feel free to contact me.

Regards,

Sarah Phillips

Sarah Phillips
Corporate Compliance Manager
Waste Connections

Attachments: A – Rule 402 NOVs from SCAQMD
B – January 7, 2026 NOV from the Water Board
C – NOV #P82507 from SCAQMD
D – NOV #P82508 from SCAQMD
E – Chart of Chiquita’s Implementation of the SCAQMD Stipulated Order
F – Chart of Chiquita’s Implementation of the LEA’s 2024 and 2025
Compliance Orders
G – Chart of Chiquita’s Implementation of the EPA UAO
H – Chart of Chiquita’s Implementation of the DTSC ISE Order

cc: David Nguyen, Public Works

ATTACHMENT A



NOTICE OF VIOLATION

DATE OF VIOLATION		
Month	Day	Year
1	2	2026

Facility Name <i>Chiquita Canyon Landfill</i>		Facility ID# <i>119219</i>	Sector <i>VB</i>
Location Address <i>29201 Henry Mayo Dr.</i>		City <i>Castaic</i>	Zip <i>91384</i>
Mailing Address <i>29201 Henry Mayo Dr.</i>		City <i>Castaic</i>	Zip <i>91384</i>

YOU ARE HEREBY NOTIFIED THAT YOU HAVE BEEN CITED FOR ONE OR MORE VIOLATIONS OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT (SCAQMD) RULES, STATE LAW OR FEDERAL LAW. IF PROVEN, SUCH VIOLATION(S) MAY RESULT IN THE IMPOSITION OF CIVIL OR CRIMINAL PENALTIES.

EACH DAY A VIOLATION OCCURS MAY BE HANDLED AS A SEPARATE OFFENSE REGARDLESS OF WHETHER OR NOT ADDITIONAL NOTICES OF VIOLATION ARE ISSUED.

DESCRIPTION OF VIOLATIONS

#	Authority*	Code Section or Rule No.	SCAQMD Permit to Operate or CARB Registration No.	Condition No. (If Applicable)	Description of Violation
1	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	<i>402</i>			<i>For discharging such quantities of air contaminants to cause injury, detriment, nuisance, or annoyance to a considerable number of persons.</i>
2	<input type="checkbox"/> SCAQMD <input checked="" type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	<i>41700</i>			
3	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
4	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
5	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				

Served To: <i>Kate Logan</i>	Phone: <i>346-807-5547</i>	Served By: <i>Gerardo Vergara</i>	Date Notice Served: <i>1/2/2026</i>
Title: <i>Senior Remediation Project Manager</i>	Email: <i>Kate.Logan@westcoastconnections.com</i>	Phone No: <input checked="" type="checkbox"/> 909-396- <input type="checkbox"/> 310-233- <i>2179</i>	Email: <i>gvergara @ aqmd.gov</i>
*Key to Authority Abbreviations: SCAQMD - South Coast Air Quality Management District CH&SC - California Health and Safety Code CCR - California Code of Regulations		Method of Service: <input checked="" type="checkbox"/> In Person <input type="checkbox"/> Certified Mail	



South Coast Air Quality Management District
21865 COPLEY DRIVE, DIAMOND BAR, CA 91765-4178

P 75345

NOTICE OF VIOLATION

DATE OF VIOLATION		
Month:	Day:	Year:
1	19	26

Facility Name: Chiquita Canyon Landfill		Facility ID#: 119219	Sector: VB
Location Address: 29201 Henry Mayo Dr		City: Castaic	Zip: 91384
Mailing Address: 29201 Henry Mayo Dr		City: Castaic	Zip: 91384

YOU ARE HEREBY NOTIFIED THAT YOU HAVE BEEN CITED FOR ONE OR MORE VIOLATIONS OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT (SCAQMD) RULES, STATE LAW OR FEDERAL LAW. IF PROVEN, SUCH VIOLATION(S) MAY RESULT IN THE IMPOSITION OF CIVIL OR CRIMINAL PENALTIES.

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1	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	402			For discharging such quantities of air contaminants to cause injury, detriment
2	<input type="checkbox"/> SCAQMD <input checked="" type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	41700			nuisance or annoyance to a considerable number of persons
3	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
4	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
5	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				

Served To: Kate Logan	Phone: 316-907-5547	Served By: Tung Allen Vu	Date Notice Served: 1.20.26
Title: Senior Remediation Manager Project	Email: kate.logan@weberconnections.com	Phone No: <input checked="" type="checkbox"/> 909-396-2679 <input type="checkbox"/> 310-233-	Email: tallenVu@aqmd.gov

*Key to Authority Abbreviations:

SCAQMD - South Coast Air Quality Management District
CCR - California Code of Regulations

CH&SC - California Health and Safety Code
CFR - Code of Federal Regulations

Method of Service:

In Person

Certified Mail

ORIGINAL



NOTICE OF VIOLATION

DATE OF VIOLATION		
Month:	Day:	Year:
1	21	2026

Facility Name: Chiquita Canyon LLC		Facility ID#: 119219	Sector: V13
Location Address: 29201 Henry Mayo Dr.		City: Castaic	Zip: 91384
Mailing Address: 29201 Henry Mayo Dr.		City: Castaic	Zip: 91384

YOU ARE HEREBY NOTIFIED THAT YOU HAVE BEEN CITED FOR ONE OR MORE VIOLATIONS OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT (SCAQMD) RULES, STATE LAW OR FEDERAL LAW. IF PROVEN, SUCH VIOLATION(S) MAY RESULT IN THE IMPOSITION OF CIVIL OR CRIMINAL PENALTIES.

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1	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	402			For discharging such quantities of air contaminants to cause injury, detriment, nuisance, or annoyance to a considerable number of persons
2	<input type="checkbox"/> SCAQMD <input checked="" type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	41700			
3	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
4	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
5	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				

Served To: Sarah Phillips	Phone: (248) 930-2779	Served By: Vincent Mota	Date Notice Served: 1/29/26
Title: Corporate Compliance Manager	Email: sarah.phillips@wasteconnections.com	Phone No: <input checked="" type="checkbox"/> 909-396-3537 <input type="checkbox"/> 310-233-	Email: vmota@aqmd.gov

*Key to Authority Abbreviations:

SCAQMD - South Coast Air Quality Management District
CCR - California Code of Regulations

CH&SC - California Health and Safety Code
CFR - Code of Federal Regulations

Method of Service:

In Person

Certified Mail

ORIGINAL



NOTICE OF VIOLATION

DATE OF VIOLATION		
Month	Day	Year
01	23	2026

Facility Name: Chiquita Canyon Landfill		Facility ID#: 119219	Sector: VB
Location Address: 29201 Henry Mayo Dr		City: Castaic	Zip: 91384
Mailing Address: 29201 Henry Mayo Dr		City: Castaic	Zip: 91384

YOU ARE HEREBY NOTIFIED THAT YOU HAVE BEEN CITED FOR ONE OR MORE VIOLATIONS OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT (SCAQMD) RULES, STATE LAW OR FEDERAL LAW. IF PROVEN, SUCH VIOLATION(S) MAY RESULT IN THE IMPOSITION OF CIVIL OR CRIMINAL PENALTIES.

EACH DAY A VIOLATION OCCURS MAY BE HANDLED AS A SEPARATE OFFENSE REGARDLESS OF WHETHER OR NOT ADDITIONAL NOTICES OF VIOLATION ARE ISSUED.

DESCRIPTION OF VIOLATIONS

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1	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	Rule 402			For discharging such quantities of air contaminants to cause injury, detriment, nuisance or annoyance to a considerable number of persons
2	<input type="checkbox"/> SCAQMD <input checked="" type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	California H&S Code sec 41700			
3	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
4	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
5	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				

Served To: Sarah Philips Steve Cassola	Phone: 248-930-2779	Served By: Daniel Rosas	Date Notice Served: 01/23/2025
Title: Corporate Compliance Manager	Email: Sarah.philips@wasteconnections.com	Phone No: <input checked="" type="checkbox"/> 909-396-2080 <input type="checkbox"/> 310-233-	Email: drosas @ aqmd.gov

*Key to Authority Abbreviations: SCAQMD - South Coast Air Quality Management District CCR - California Code of Regulations	CH&SC - California Health and Safety Code CFR - Code of Federal Regulations	Method of Service: <input type="checkbox"/> In Person <input checked="" type="checkbox"/> Certified Mail
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ORIGINAL

4 electronic mail

ATTACHMENT B



Los Angeles Regional Water Quality Control Board

January 7, 2026

Sarah Phillips
Waste Connections, Inc.
Chiquita Canyon Landfill
29201 Henry Mayo Drive
Castaic, Ca 91384

Certified Mail
Return Receipt Requested
Claim No. 9589 0710 5270 2307 8867 66

Dan Schooler
Legally Responsible Person
Chiquita Canyon Landfill
29201 Henry Mayo Drive
Castaic, Ca 91384

Certified Mail
Return Receipt Requested
Claim No. 9589 0710 5270 2307 8867 73

Koy Saechao
Agent for Service of Process
1505 Corporation, CSC –
Lawyers Incorporating Service
2710 Gateway Oaks Drive
Sacramento, CA 95833

Certified Mail
Return Receipt Requested
Claim No. 9589 0710 5270 2307 8867 80

Chiquita Canyon, LLC
3 Waterway Square Place #110
The Woodlands, TX 77380

Certified Mail
Return Receipt Requested
Claim No. 9589 0710 5270 3226 2543 84

NOTICE OF VIOLATION: STORMWATER COMMINGLED WITH UNAUTHORIZED NON-STORMWATER DISCHARGE – CHIQUITA CANYON LANDFILL, 29201 HENRY MAYO DRIVE, CASTAIC, CA 91384, WDID NO. 4 191022488

Dear Sarah Phillips, and Dan Schooler:

Chiquita Canyon, LLC (hereinafter “Discharger”) operates Chiquita Canyon Landfill, located at 29201 Henry Mayo Drive in Castaic (hereinafter “CCL”) that is subject to the requirements of the National Pollutant Discharge Elimination (NPDES) General Permit for Stormwater Discharges Associated with Industrial Activities (Order No. 2014-0057-DWQ, as amended by Order No. 2018-0028-DWQ) (Industrial General Permit).

General Permit Section III.B. states:

“Except for non-storm water discharges (NSWDs) authorized in Section IV, discharges of liquids or materials other than stormwater, either directly or indirectly to waters of the United States, are prohibited unless authorized by another NPDES permit.”

DAVID NAHAI, CHAIR | SUSANA ARREDONDO, EXECUTIVE OFFICER

General Permit Section III.C. states:

“Industrial storm water discharges and authorized NSWs that contain pollutants that cause or threaten to cause pollution, contamination, or nuisance as defined in section 13050 of the Water Code, are prohibited.”

On November 14, 2025, the Discharger notified Los Angeles Regional Water Quality Control Board (Los Angeles Water Board) staff of a force main leak of approximately 8,000 gallons of characteristically hazardous leachate on the top deck of the landfill. The leachate comingled stormwater was pumped into the stormwater channel that flows into the East Basin where it remained.

On December 22, 2025, Los Angeles Water Board Staff inspected CCL prior to a forecasted storm event.¹ The Discharger had installed a berm in the East Basin to separate the basin outlet from the East Basin (Photo 1). The Discharger also installed a barrier over the East Basin outlet with steel plates, and a plastic covering with wood braces and sandbags (Photo 2). According to Ms. Amanda Froman of Waste Connections, the barrier also consisted of a sealing foam. The intention of these Best Management Practices (BMPs) was to prevent the discharge of leachate comingled stormwater.

During the storm event that occurred from December 23-26, 2025, the leachate comingled stormwater overtopped the installed berm and filled up the area behind the installed barrier (Photos 3-4). On December 29, 2025, CCL staff heard water from the East Basin flowing through the barrier into the stormwater channel that flows into Castaic Creek. Castaic Creek flows into Reach 5 of the Santa Clara River. Both Castaic Creek and Santa Clara River are designated waters of the United States. The leachate comingled stormwater continued to discharge during and after the December 23-26, 2025, storm event until the water level dropped below the level of the leak.

On December 29, 2025, Los Angeles Water Board received notification from Ms. Amanda Froman that Chiquita believes that some stormwater from the East Basin escaped past the steel plates likely beginning on December 25 or 26.

On December 30, 2025, during an interagency meeting, Ms. Sarah Phillips stated that CCL staff heard water in the East Basin leaking through the steel plates used to block the East Basin outlet.

You are hereby notified that based on the Discharger's notifications to the Los Angeles Water Board, Chiquita Canyon, LLC is in violation of the requirements established in the Industrial General Permit by discharging leachate comingled stormwater from the East Basin to Castaic Creek.

Pursuant to California Water Code section 13385, subdivision (c)(1), the Discharger is subject to discretionary administrative civil liability of up to ten thousand dollars (\$10,000)

¹ All photos contained herein were taken by Scott Landon, staff at the Los Angeles Water Board. A complete inspection report will be transmitted after the date of this letter.

for each day in which the violation(s) occurs. The discretionary administrative civil liability may be assessed by the Los Angeles Water Board beginning with the date that the violation(s) first occurred. The Los Angeles Water Board may also refer this matter to the Attorney General's Office for further enforcement. Please note that this Notice shall not be deemed to relieve you of liability for any penalties that may have already been accrued. The Los Angeles Water Board reserves its right to take any further enforcement action authorized by law.

If you need assistance or have any questions, please contact Scott Landon of my staff at (213) 620-2122 or via email at Scott.Landon@waterboards.ca.gov, or Pavlova Vitale at (213) 576-6751 or via email at Pavlova.Vitale@waterboards.ca.gov.

Sincerely,

Jenny
Newman



Digitally signed by Jenny
Newman
Date: 2026.01.07 09:55:11
-08'00'

Water Boards

Jenny Newman
Assistant Executive Officer

cc: (via email)

Russ Colby, Russ.Colby@waterboards.ca.gov

Pavlova Vitale, Pavlova.Vitale@waterboards.ca.gov

Kate Logan, Kate.Logan@wasteconnections.com

Amanda Froman, Amanda.Froman@wasteconnections.com

Chris Fear, Chris.Fear@wasteconnections.com

John Perkey, John.Perkey@wasteconnections.com

Dylan Smith, Dylan.Smith@wasteconnections.com

Erin Neal, Erin.Neal@dtsc.ca.gov

Zanalee Zmily, Zanalee.Zmily@dtsc.ca.gov

Dylan Clark, Dylan.Clark@dtsc.ca.gov

Amy Miller, miller.amy@epa.gov

Laura Friedli, friedli.laura@epa.gov

Todd Sax, Todd.Sax@calepa.ca.gov

Photo Log



Photo 1

A view of the dirt berm placed in the East Basin during the December 22, 2025, inspection.



Photo 2

A view of the barrier placed over the East Basin outlet during the December 22, 2025, inspection.



Photo 3

A photo showing the comingled leachate with stormwater flowed into the area behind the dirt berm.



Photo 4

A photo showing the outlet of the East Basin.

ATTACHMENT C



NOTICE OF VIOLATION

DATE OF VIOLATION		
Month:	Day:	Year:
11	14	25

Facility Name: Chiquita Canyon Landfill		Facility ID#: 119219	Sector: VB
Location Address: 29201 Henry Mayo Dr.		City: Castaic	Zip: 91384
Mailing Address: 29201 Henry Mayo Dr.		City: Castaic	Zip: 91384

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1	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	3002(c)(1)	Title V Section D Permit G43917	2	Failed to properly maintain and keep equipment in good operating condition at all times
2	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	3002(c)(1)	Title V Section D Permit G43917	3	Failed to operate and maintain equipment by personnel properly trained in its operation
3	<input type="checkbox"/> SCAQMD <input checked="" type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	3002(c)(1)	Title V Section K	8	Failed to comply with all regulatory requirements and permit terms and conditions
4	<input type="checkbox"/> SCAQMD <input checked="" type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	42401	Order for Abatement Case No. 6177-4	15	Failed to comply with all conditions under the landfill gas collection system permit
5	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	42401	Order for Abatement Case No. 6177-4	24	Failed to prevent standing leachate and the pooling or ponding of leachate exposed to atmosphere throughout the facility. Failed to immediately collect and contain leachate in a sealed tanker truck or tank; or, failed to timely conduct repairs that would redirect leachate into the leachate collection system
6	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	42401	Order for Abatement Case No. 6177-4	25	Failed to mitigate odors and the dispersion and exposure of leachate into the atmosphere, to the maximum extent possible

Served To: Kate Logan	Phone: (346) 807-5547	Served By: Christina Ojeda	Date Notice Served: 1/14/26
Title: Senior Remediation Project Manager	Email: Kate.Logan@WasteConnections.com	Phone No: <input checked="" type="checkbox"/> 909-396-2475	Email: cojeda@aqmd.gov

*Key to Authority Abbreviations: SCAQMD – South Coast Air Quality Management District CCR – California Code of Regulations	CH&SC – California Health and Safety Code CFR – Code of Federal Regulations	Method of Service: <input type="checkbox"/> In Person <input checked="" type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> Electronic Mail
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What is a Notice of Violation?

A Notice of Violation is issued by an SCAQMD Air Quality Inspector to inform a business that a failure to comply with one or more applicable federal, state, and/or local (SCAQMD) air pollution rules and regulations or legal requirements is being alleged.

What happens when I receive a Notice of Violation?

If you are operating in violation of one or more applicable federal, state, and/or local (SCAQMD) air pollution rules and regulations or legal requirements, each day or part of a day that you operate in violation is considered a separate violation even if only one Notice of Violation has been issued. Continuing to operate in violation may subject you to substantial civil or criminal penalties. **It is in your best interest to resolve any compliance problem immediately before you resume operation.**

What if I need to continue to operate the equipment named in the Notice of Violation?

If continued operation of equipment cited in the Notice of Violation is necessary, you may be able to obtain a variance from SCAQMD's Hearing Board. A **variance** is an administrative order that allows a company to continue operating without penalties while it takes appropriate steps to meet air pollution control requirements. Proof of specific legal circumstances must be provided before a variance can be granted. Timeliness in seeking such relief will be considered by the Hearing Board. Additional information concerning variances can be found in California Health & Safety Code §§ 42350-42359.5 and at <http://www.aqmd.gov/home/about/hearing-board>.

During a hearing for a variance, you may be represented either by yourself or by your attorney or consultant. You will have the opportunity to present evidence and testimony, and to cross-examine any SCAQMD witness.

If you fail to comply with any order of the Hearing Board, you may be subject to additional civil or criminal penalties set forth in California Health & Safety Code §§ 42400 *et seq.* and 42402 *et seq.*

How are Notices of Violation resolved?

The SCAQMD General Counsel's office reviews each alleged violation and, based on the facts, determines how best to resolve the allegation. Options available to the General Counsel's office include:

- **Minor Source Penalty Assessment Program**

Certain Notices of Violation may be eligible for resolution through SCAQMD's Minor Source Penalty Assessment Program if they are issued to a minor source or for violations other than emitting air toxics or creating a

public nuisance involving injury or property damage.

If your case is handled by this program, you will receive a letter or phone call from an investigator in the SCAQMD General Counsel's office offering to settle your violation. Settlement terms usually call for a penalty payment and written proof of current compliance. The investigator's name and telephone number are included in the initial settlement letter in the event you would like to discuss the case.

Be prepared to describe any facts about the violation that you believe SCAQMD should know in considering your case. Sharing your knowledge of the facts, possible causes for the violation and plans to avoid future violations will help the investigator arrive at an appropriate disposition. **Be sure to respond by the date indicated in the letter to avoid further legal action.**

If the Minor Source Penalty Assessment Program fails to result in a settlement, your Notice of Violation may be referred to an SCAQMD attorney and handled under the procedures for Civil Prosecution or resolved through a Small Claims Court.

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Available Resources

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Contact Numbers	Useful Links
General Information:	
SCAQMD Headquarters General Number (909) 396-2218	About SCAQMD http://www.aqmd.gov/home/about
General Counsel's Office (909) 396-3400	Enforcement Authority http://www.aqmd.gov/home/about/authority/enforcement
	Compliance Notices http://www.aqmd.gov/home/regulations/compliance/compliance-notice
	SCAQMD Rules http://www.aqmd.gov/home/regulations/rules
Obtaining Permit or Billing Information:	
Small Business Assistance (800) 388-2121	Getting Permits http://www.aqmd.gov/home/permits
Permit Information (909) 396-2468	Permit Forms http://www.aqmd.gov/home/permits/permit-application-forms
Billing Services (866) 888-8838 (909) 396-2900	Permitting Fees http://www.aqmd.gov/home/permits/fees
Variances:	
Clerk of the Hearing Board (909) 396-2500	The Hearing Board http://www.aqmd.gov/home/about/hearing-board

ATTACHMENT D



NOTICE OF VIOLATION

DATE OF VIOLATION		
Month:	Day:	Year:
12	22	25

Facility Name: Chiquita Canyon Landfill		Facility ID#: 119219	Sector: VB
Location Address: 29201 Henry Mayo Dr.		City: Castaic	Zip: 91384
Mailing Address: 29201 Henry Mayo Dr.		City: Castaic	Zip: 91384

YOU ARE HEREBY NOTIFIED THAT YOU HAVE BEEN CITED FOR ONE OR MORE VIOLATIONS OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT (SCAQMD) RULES, STATE LAW OR FEDERAL LAW. IF PROVEN, SUCH VIOLATION(S) MAY RESULT IN THE IMPOSITION OF CIVIL OR CRIMINAL PENALTIES. EACH DAY A VIOLATION OCCURS MAY BE HANDLED AS A SEPARATE OFFENSE REGARDLESS OF WHETHER OR NOT ADDITIONAL NOTICES OF VIOLATION ARE ISSUED.

DESCRIPTION OF VIOLATIONS

#	Authority*	Code Section or Rule No.	SCAQMD Permit to Operate or CARB Registration No.	Condition No. (If Applicable)	Description of Violation
1	<input type="checkbox"/> SCAQMD <input checked="" type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	42401	Order for Abatement Case No. 6177-4	34(c)	Failed to provide automatic electronic notification via email for exceedance of acute 1-Hour OEHHA REL for benzene in real-time, and failed to provide an automatic electronic notification after the applicable weighted average fell below the applicable REL
2	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
3	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
4	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
5	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				

Served To: Kate Logan	Phone: 346-807-5547	Served By: Christina Ojeda	Date Notice Served: 1/15/26
Title: Senior Remediation Project Manager	Email: Kate.Logan@wasteconnections.com	Phone No: <input checked="" type="checkbox"/> 909-396-2475	Email: cojeda@aqmd.gov

*Key to Authority Abbreviations: SCAQMD – South Coast Air Quality Management District CCR – California Code of Regulations	CH&SC – California Health and Safety Code CFR – Code of Federal Regulations	Method of Service: <input type="checkbox"/> In Person <input checked="" type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> Electronic Mail
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Billing Services (866) 888-8838 (909) 396-2900	Permitting Fees http://www.aqmd.gov/home/permits/fees
Variances:	
Clerk of the Hearing Board (909) 396-2500	The Hearing Board http://www.aqmd.gov/home/about/hearing-board

ATTACHMENT E

Action Items for South Coast Air Quality Management District

Case No. 6177-4 Stipulated Order for Abatement (chart modified on January 30, 2026)

Completed Actions

Condition No.	Key Action	Start Date/Deadline	Status
1(f)	Designate an employee able to receive notifications related to odor surveillance results	9/7/2023	Completed
31	Submit completed design for the geosynthetic cover	9/12/2023	Completed
13	Connect 18 vertical dual extraction wells to the LFG system	9/15/2023	Completed
45	Install, maintain, and operate 1,000 feet or more of Semi-Permanent Vapor Odor Control in the Reaction Area	9/20/2023	Completed
1(a)	Contract with a trained third party to conduct odor surveillance	10/6/2023	Completed
12, 12(a)	Form the Reaction Committee	10/6/2023	Completed
12	Provide Reaction Committee member information to South Coast AQMD	10/6/2023	Completed
16	Submit permit modification application for LFG system	10/6/2023	Completed
19	Submit permit modification application for LFG condensate and leachate collection/storage system	10/6/2023	Completed
12(i)	Submit report on initial flux chamber study	10/31/2023	Completed
15	Notify South Coast AQMD of number of wells added to wellfield	10/31/2023	Completed
21	Submit permit application for Flare 4	10/31/2023	Completed
31	Notify South Coast AQMD on progress of procuring and installing cover	10/31/2023	Completed
44	Obtain and install onsite MET station in the Reaction Area	10/31/2023	Completed
17	Identify LFG wells with worst liquid impaction issues in the Reaction Area	11/3/2023	Completed
12(g)(iv)	Submit report on landfill best management practices	11/6/2023	Completed
20	Install and operate Flare 3; notify South Coast AQMD	11/24/2023	Completed: installed 11/15; notified 11/17
12(g)(iii)	Submit report on feasibility of continuous community emission monitoring system	12/1/2023	Completed

Condition No.	Key Action	Start Date/Deadline	Status
32	Submit report on air dispersion modeling	12/1/2023	Completed
18	Submit proposed Reaction Area dewatering guidelines	12/5/2023	Completed
12(g)(ii)	Submit report on investigation on landfill reaction cause and solutions to slow the reaction	12/8/2023	Completed
12(g)(iii)	Submit workplan for installation of continuous monitoring	12/31/2023	Completed
12(i)	Submit proposal for second flux chamber study	12/31/2023	Completed
12(g)(v)	Submit report on health risks of DMS	1/15/2024	Completed
32(b)	Submit proposal for additional air modeling study	1/15/2024	Completed
35	Provide South Coast AQMD all SOPs and QA/QC documents for air monitoring equipment	1/19/2024	Completed
41	Submit Rule 1150 Landfill Excavation Plan	1/30/2024	Completed
15(a)	Provide the design and installation schedule for 70 new wells and their associated piping	1/31/2024	Completed
36	Provide updates to South Coast AQMD on the installation of the continuous BTEX/VOC monitoring equipment	2/16/2024	Completed
37	Take at least 10 liquid samples from wells with pumps in the Reaction Area with the highest average temps to the extent possible and analyze per USEPA Method 624.1	3/5/2024	Completed
26	Prepare and submit to South Coast AQMD the Discharge of Pressurized Leachate Containment Feasibility Study	3/12/2024	Completed
50	Provide a workplan listing the actions Chiquita plans to take to address the reaction	3/13/2024	Completed
37	Submit the results to South Coast AQMD along with the lab analysis from the 10/20/23 sampling event	3/15/2024	Completed
17	Install dewatering sumps/pumps in at least 60% of vertical wells in the Reaction Area capable of extracting liquids; if infeasible, provide detailed rationale and reasoning in Condition 8	3/15/2024	Completed

Condition No.	Key Action	Start Date/Deadline	Status
	report and continue implementing dewatering guidelines		
36	Provide updates to South Coast AQMD on the installation of the continuous BTEX/VOC monitoring equipment	3/17/2024	Completed
12(i)	Conduct second flux chamber study	3/19-21/2024	Completed
67	Designate an Inspection Liaison	3/25/2024; updated 9/4/2025 and 1/26/2026	Completed
64	Provide Leachate Management Plan submitted to EPA under UAO to South Coast AQMD	3/28/2024	Completed
12(a)(iv)	Add Reaction Committee member relating to public health	4/5/2024	Completed
18	Revise dewatering guidelines and resubmit for approval	4/4/2024	Completed
56	Conduct sampling and analysis of vapors in headspace of leachate tanks in #9 Top Deck Tank Farm	4/4/2024	Completed
15(b)(i)	Submit an updated design and installation schedule incorporating the additional wells under Condition 15(a) and (b) and their associated piping	4/18/2024	Completed
56	Submit report of headspace tank sampling and analysis parameters and lab results to South Coast AQMD	4/18/2024	Completed
66(a)	Submit recommendations regarding installation of remote well pressure and temperature monitoring system	4/19/2024	Completed
15(a)	Provide updates to the design and schedule for the 70 wells in Condition 8 reports	4/20/2024	Completed
57	Submit expedited permit modification application for Landfill Gas Condensate and Leachate Collection/Storage System to increase liquid storage capacity	4/22/2024	Completed
60	Submit expedited permit modification application for Landfill Gas Collection to include tie-in of the treatment system vapor vent lines	4/22/2024	Completed
63	Submit schematic of current leachate treatment and storage system to South Coast AQMD	4/22/2024	Completed

Condition No.	Key Action	Start Date/Deadline	Status
69 (old)	Submit workplan to restart leachate pumping to South Coast AQMD Hearing Board	4/22/2024	Completed
1(f)	Designate an employee in the Reaction Area and the working face area able to receive notifications related to odor surveillance results	4/25/2024	Completed
1(f)	Have trained employee(s) or contractor(s) re-perform odor surveillance following deployment of additional fresh trash odor mitigation to assess if trash odors have dissipated	4/25/2024; no longer applicable since there are no longer external waste disposal operations	Completed
12(g)(i)	Submit report on study of treatment of DMS and preventative mechanisms for DMS formation	4/30/2024	Completed
34(c)	Retain a third party to develop an automatic electronic notification system for the community air monitoring	4/30/2024	Completed
36	Install and maintain continuous BTEX/VOC monitoring equipment at MS-10 and MS-12	5/1/2024	Completed
36	Develop a monitoring plan for the microGCs	5/1/2024	Completed
36(a)	Make continuous BTEX/VOC monitoring data available on Chiquita's Odor Mitigation webpage	5/1/2024	Completed
36(b)	Increase the number of 24-hour canister sampling and analysis for VOCs at MS-06 through MS-12 to 3 times per week	5/1/2024	Completed
32(c)	Revise air modeling study proposal and resubmit to South Coast AQMD	5/8/2024	Completed
72(b)	Submit source test protocol for vapor flow testing	5/17/2024	Completed
61	Submit expedited permit modification application for Landfill Gas Flare System (Flare Nos. 1 and 2) to include combustion vapor from treatment system	5/21/2024	Completed
62	Submit expedited permit modification application for Landfill Gas Flares System (Flare No. 3) to include	5/21/2024	Completed

Condition No.	Key Action	Start Date/Deadline	Status
	combustion vapor from treatment system		
71	Submit a complete permit application for the landfill gas collection system under the geosynthetic cover	5/21/2024	Completed
73	Prepare an inventory of all internal combustion engine equipment rated greater than 50 HP onsite as of April 25, 2024	5/21/2024	Completed
34(c)	Third party must develop and install an automatic electronic notification system for the community air monitoring	5/30/2024	Completed
12(i)	Submit report on second flux chamber study	6/3/2024	Completed
58	Submit expedited permit modification application for Zeeco TOX	6/21/2024	Completed
66(a)	Finalize contracts to install and operate remote well pressure and temperature monitoring system	6/21/2024	Completed
12(g)(viii)	Conduct an investigation into piping materials and submit a report on the existing and future planned piping, including a recommendation of appropriate piping materials and replacement of existing piping materials	6/21/2024	Completed
12(g)(vii)	Develop a model to estimate the rate of liquid generation in the landfill and total quantity of liquid existing within the landfill waste mass at any given time and submit a report summarizing the model and results of the modeling	6/25/2024	Completed
70	Submit a report on current and projected landfill gas generation and flaring capacity	6/28/2024	Completed
73	Submit a permit application for internal combustion engine equipment rated greater than 50 HP that is not already permitted through SCAQMD	6/30/2024	Completed
15(b)(i)	Install 50% of wells necessary to achieve well installation density	7/1/2024	Completed
68	Install pressure gauges on each leachate tank	7/10/2024	Completed
72(d)	Conduct pressure testing and monitoring within the HDPE headers	7/10/2024	Completed

Condition No.	Key Action	Start Date/Deadline	Status
	venting the leachate tanks until pressure gauges are installed		
72(b)	Resubmit source test protocol for vapor flow testing	7/12/2024	Completed
86(g)	Sample ports must be installed at the locations of the 5 flow meters on the dedicated headers connected to the liquid treatment system, leachate tanks, solid handling tanks installed pursuant to Condition No. 72(e), and any other equipment associated with the treatment or storage process	7/14/2024	Completed
72(e)	Install flow meters within the HDPE piping headers for the leachate tanks	7/19/2024	Completed
12(g)(vi)	Prepare and submit to South Coast AQMD a report of the health impacts from ongoing and long-term exposure to H2S or other speciated sulfur compounds and other HAPs	8/1/2024	Completed
85(a)	Operate perimeter odor control misters along the west slope excavation area	8/28/2024; during the west slope excavation project	Completed
32(c)	Submit final report on additional air modeling study	9/2/2024 or 90 days after South Coast AQMD approval of proposal, whichever is later	Completed
85(c)	Submit weekly reports on activities related to the west slope excavation project and the toe drain termination project	9/3/2024	Completed
85(b)	Operate a Semi Permanent Vapor Odor Control System along the west slope excavation area	9/10/2024; ongoing during excavation	Completed
66(a)	Finalize contracts to install and operate the temperature remote monitoring system	9/17/2024	Completed
66(a)(i)	Submit the June 21, 2024 contract to install and operate the remote monitoring system to South Coast AQMD	9/17/2024	Completed
66(a)(ii)	Submit all known information of remote monitoring system design,	9/17/2024	Completed

Condition No.	Key Action	Start Date/Deadline	Status
	implementation, installation, and specification issues/concerns		
27(f)	Develop and submit SOPs for leachate tank operations in tank farm areas	9/23/2024	Completed
34(c)	Third party must develop and install an automatic electronic notification system for the onsite air monitoring	9/23/2024	Completed
15(b)(ii), (iii)	Install 75% of wells necessary to achieve well installation density, and if cannot be installed to the desired depth in time, install 75% of wells necessary to achieve the well installation density at the depths achievable	10/1/2024	Completed
66(a)(iii)	Contact at least three reputable vendors/manufacturers/distributors for each of the remote monitoring systems, devices, and components that have identified issues/concerns and obtain proposed solutions and recommendations for each of the identified issues/concerns; submit the results of these communications to South Coast AQMD	10/11/2024	Completed
66(a)(v)	The Reaction Committee must determine the location for installation of the remote monitoring system equipment and submit its determination to South Coast AQMD	10/15/2024	Completed
66(a)(iv)	Submit the findings and solutions to issues documented in Condition 66(a)(ii) and (iii), including inventory of vertical wells and temperature monitoring probe network	10/30/2024	Completed
70(a)	Submit a permit application for the construction of Flare 5 and modifications of Flares 1 through 4, to the extent necessary, to increase the landfill gas control capacity	10/31/2024	Completed
86(c)	Install sampling ports on all leachate tanks for which leachate sampling would occur and would otherwise result in leachate exposure to open air during sampling; collect samples from such sampling ports	11/1/2024	Completed

Condition No.	Key Action	Start Date/Deadline	Status
86(c)	Prepare and submit a schematic of the leachate treatment equipment, showing where the sampling ports are located	11/1/2024	Completed
34(c)	Third party must put automatic electronic notification system for the ambient air monitoring into effect	11/4/2024	Completed
84	Evaluate the installation of the windbreaks and/or wind flow disrupters along the western and northern borders of the facility, and/or ridgeline; submit a report detailing the findings of the evaluation	11/15/2024	Completed
81(c)	Develop a system allowing members of the public to sign up for notifications of outages or downtime via email or text messages	11/18/2024	Completed
76	Install sampling ports on all equipment onsite that requires sampling to prevent unnecessary fugitive emissions from sampling activities	12/2/2024	Completed
13	Continue to operate the two sumps with pumps along the west slope; as new landfill gas wells are completed, begin operating them	12/4/2024	Completed
88(b)	Install backup power at the Zeeco TOX	12/5/2024	Completed
81(c)	Deploy the downtime notification system	12/10/2024	Completed
72(c)	Submit a recommendation from the Reaction Committee on additional vapor flow testing	12/15/2024	Completed
66(a)(v)	Install and operate a remote monitoring system for temperature in at least 20 wellheads operated in the Condition 9(a) Reaction Area	12/24/2024	Completed
88(a)	Complete the connection of the flare station to permanent grid power	12/31/2024	Completed
31	Install a geosynthetic cover over western portions of the Module 2B/3/4 Phase 2, Module 2B/3, and Module 4 to limit the migration of the landfill gas from the site. Notify South Coast AQMD on progress of procuring and installing cover	Initial notification on 10/31/2023; monthly updates until installation complete; installation completed on January 3, 2025	Completed

Condition No.	Key Action	Start Date/Deadline	Status
43	Maintain fresh trash odor mitigation measures during Unfavorable Wind Conditions	1/1/2025; no longer applicable since there are no longer external waste disposal operations	Completed
43(f)	If trash-based odors are detected during Condition 1(f) odor surveillance, deploy additional orchard fans to working face and surrounding area	1/1/2025; no longer applicable since there are no longer external waste disposal operations	Completed
43(f)	If trash-based odors are not reduced within 1 hour of deployment of additional fans, reduce working face by 25% of the day's total size	1/1/2025; no longer applicable since there are no longer external waste disposal operations	Completed
15(b)	Install additional gas wells with the desired depth to achieve a vertical well density of an average of three operational wells per acre with at least two wells per acre. If this cannot be completed within the deadlines, install the wells to the depths achievable at the well installation density	1/6/2025	Completed
59	Submit expedited permit modification application for Landfill Gas Condensate and Leachate Treatment System for hazardous waste treatment	Submitted 6/21/2024; rejected by SCAQMD on 9/26/2024; revised in response to SCAQMD and re-submitted 1/10/2025	Completed
66(a)(vi)	Reaction Committee must submit a proposal to assess the viability and functionality of a remote monitoring system which measures temperature and pressure within a well with a pump located within the Reaction Area,	1/31/2025	Completed

Condition No.	Key Action	Start Date/Deadline	Status
	including assessment of multiple depths within the well		
83	Conduct a study and analysis of specific landfill operational events from June 1, 2024 through December 31, 2024 and their potential emission impacts to the surrounding community, as determined from an analysis of the air quality data recorded at monitoring stations MS-01 through MS-12, and submit a report detailing related data and the general findings of the study and a proposed scope for a continuation of the study	3/31/2025	Completed
36(c)	Ensure the microGCs at MS-10 and MS-12 are capable of measuring hourly concentrations of acrolein	4/16/2025	Completed
78	Install a 60-mil liner overlaying two feet of compacted soil lining the bottom and 5 feet off the sides of the perimeter of each leachate tank and/or tank farms, except for driving lanes required for trucks to access leachate tanks for leachate disposal or other routine operations or maintenance	4/16/2025 for new tank farms	Completed
95	Submit a permit modification application for the Landfill Gas and Leachate Collection/Storage System to increase the liquid storage capacity and include the new temporary tank farm located in Canyon D	4/30/2025	Completed
96	Update prior estimates of current and projected landfill gas generation prepared pursuant to Condition No. 70	4/30/2025	Completed
72(c)	May submit further recommendations from the Reaction Committee on additional vapor flow testing	5/16/2025	Completed
94	Submit a permit application for the additional landfill gas combustion/control unit brought on-site in February 2025	5/30/2025	Completed
93	Ensure hydrostatic liquid level transmitters are installed in all leachate storage tanks capable of having such transmitters installed in them	6/30/2025	Completed

Condition No.	Key Action	Start Date/Deadline	Status
69	Submit a recommendation as to modifying the frequency of piping monitoring	7/31/2025	Completed
75	Reaction Committee to submit proposal to assess the viability and functionality of adding gas flow rate and composition as monitoring parameters to at least 5 remote monitoring units installed on the select wells	Submitted 8/29/2025; revised in response to South Coast AQMD comments on 9/19/2025	Completed
78	Install a 60-mil liner overlaying two feet of compacted soil lining the bottom and 5 feet off the sides of the perimeter of each leachate tank and/or tank farms, except for driving lanes required for trucks to access leachate tanks for leachate disposal or other routine operations or maintenance	9/30/2025 for existing tank farms	Completed
75	Procure, install, and begin operating remote monitoring units on 21 wellheads and 5 landfill gas headers. All units must monitor for temperature, pressure, and vacuum. Units installed on wells without pumps must also monitor for liquid levels	10/31/2025	Completed
75(a)	Submit notice of completed installation and operational start of the RMS	11/3/2025	Completed
75(g)	Grant AQMD read and download access to the RMS data	11/3/2025	Completed
63	Submit a schematic of the current leachate treatment system and leachate storage system	12/16/2025	Completed
34(c)	Revise the automatic air monitoring exceedance notification system to provide a notification every hour during which the applicable time weighted average continues to be above the applicable REL	12/31/2025	Completed
34(c)(i)	Retain a third-party to develop a system that allows for the automatic air monitoring exceedance notification system defined in Condition No. 34(c) to provide notifications via text message	12/31/2025	Completed
34(e)	Retain sufficient third-party support to ensure that all CH ₄ , H ₂ S, PM, and	12/31/2025	Completed

Condition No.	Key Action	Start Date/Deadline	Status
	meteorological sensors meet data quality objectives identified by the instrument vendor or outlined in the standard operating procedures or quality assurance documentation and are maintained, calibrated, and replaced in accordance with the instruments' standard operating procedures or quality assurance documentation		
34(f)	Retain sufficient third-party support to ensure that all microGC instruments meet data quality objectives identified by the instrument vendor or outlined in the standard operating procedures or quality assurance documentation; and are maintained, calibrated, and replaced in accordance with the instruments' standard operating procedures or quality assurance documentation.	12/31/2025	Completed
102	Submit a complete permit modification application for the Landfill Gas Condensate and Leachate Collection/Storage System for the removal of Tank Farm 9, and relocation, construction, and operation of tanks in Tank Farm 13	12/31/2025	Completed
103	Submit a complete permit application for the hazardous and/or non-hazardous liquid treatment system constructed and operating in Tank Farm 13	12/31/2025	Completed
27(f)(i)	Revise SOPs developed under Condition No. 27(f) to include instructions for leachate tanker truck operations, as applicable	1/9/2026	Completed
27(f)(i)	Implement revised SOPs developed under Condition No. 27(f)	1/9/2026	Completed
100	Submit a feasibility assessment proposal to assess the viability and functionality of a leachate vapor recovery and control system to recover leachate vapors during loading of liquid/leachate into the leachate tanker trucks and control	1/16/2026	Completed

Condition No.	Key Action	Start Date/Deadline	Status
	the recovered vapors either in Chiquita's existing landfill gas control system or in a new or modified system		

Ongoing Actions

Condition No.	Key Action	Start Date/Deadline	Status
1	Conduct odor surveillance at specified surveillance locations	9/7/2023; modified 8/27/2024 and 12/9/2025; ongoing	Ongoing
1(e)	Maintain odor surveillance log	9/7/2023; ongoing	Ongoing
1(f)	Review and modify odor mitigation measures based on odor surveillance results, as appropriate	9/7/2023; ongoing	Ongoing
2	Log odor surveillance notifications and actions taken in response	9/7/2023; ongoing	Ongoing
2	Make Odor Surveillance Logs available for inspection	9/7/2023; ongoing; as requested	Ongoing
3	Expedite replacement of granular activated carbon media in LFG treatment system	9/7/2023; ongoing	Ongoing; see Condition 8 monthly reports
3	Ensure adequate stock of all odor control products and supplies are maintained on site	9/7/2023; ongoing	Ongoing
3(a)	Monitor and record landfill gas temperature at the inlet of the treatment system; temp must not exceed 145°F	1/18/2024; ongoing	Ongoing
4	Maximize LFG combustion in all flares to limit release of raw LFG	3/22/2024; ongoing	Ongoing
4	Prioritize Flare 2 and Flare 3 over Flare 1	9/7/2023; ongoing	Ongoing
5	Sample LFG sulfur compounds combusted using colorimetric tests for H ₂ S	3/22/2024; weekly	Ongoing
5	Sample LFG sulfur compounds for total sulfur compounds as H ₂ S using South Coast AQMD Method 307-91	3/22/2024; daily	Ongoing
5	Sample, analyze, and record LFG sulfur compounds and speciated organic compounds in the raw, pre-treatment and pre-control LFG from the Reaction Area for total sulfur compounds at H ₂ S using SCAQMD Method 307-91 and for	3/22/2024; monthly	Ongoing

Condition No.	Key Action	Start Date/Deadline	Status
	speciated organic compounds using EPA Method TO-15		
6	Maintain adequate stock of appropriately ranged colorimetric tubes	9/7/2023; ongoing	Ongoing
7(a), (b)	Measure the total amount of landfill gas combusted at the facility; measure the daily flow of landfill gas not flared	9/7/2023; ongoing	Ongoing; see Condition 8 monthly reports
8	Submit monthly written report to South Coast AQMD	9/30/2023; modified 8/27/2024, 4/16/2025, 6/24/2025, and 12/9/2025; monthly	Ongoing
9	Conduct integrated landfill surface sampling	9/20/2023; modified 8/27/2024; ongoing	Ongoing
9(a)	Submit revised Reaction Area map and related documentation to South Coast AQMD	10/6/2023; monthly	Ongoing
9(b)	Submit monthly Reaction Area boundary determinations	10/6/2023; modified 11/13/2024, 4/16/2025, and 6/24/2025; ongoing	Ongoing
10	Conduct instantaneous landfill surface monitoring	9/13/2023; modified 8/27/2024; ongoing	Ongoing
11	Continue operating flares and treatment system despite exceedances of the TRS and SOx limits	9/7/2023; ongoing	Ongoing
11	Submit deviation reports in accordance with Title V permit to South Coast AQMD	1/18/2024; ongoing	Ongoing
12	Provide new Reaction Committee member information to South Coast AQMD	As needed	Ongoing
12(f)	Host a monthly virtual meeting with all members of the Reaction Committee and South Coast AQMD technical staff	March 2024; monthly	Ongoing
12(f)(iv)	Following each Reaction Committee meeting, prepare meeting summary and post on webpage	March 2024; monthly	Ongoing

Condition No.	Key Action	Start Date/Deadline	Status
12(h)	Post all expert reports prepared pursuant to Condition 12 on Odor Mitigation webpage	9/7/2023; ongoing	Ongoing
12(g)(vii)(1)	Update the liquid generation and total quantity model and submit a report to South Coast AQMD summarizing the updated model and results of modeling on a semi-annual basis	1/7/2025; semi-annually	Ongoing
12(i)	Conduct flux chamber studies	Quarter Four 2024; once every four months thereafter	Ongoing
12(i)	Submit flux chamber test reports	Fourth Quarter 2024 flux study report due 1/15/2025; subsequent reports due no later than 45 days after the end of the month during which a test was conducted, or no later than 90 days after approval of the protocol, whichever is later	Ongoing
12(i)	Prepare a proposed protocol for the flux chamber studies and submit to South Coast AQMD for review and approval, as needed	At least 75 days prior to the start of the month in which the test is planned	Ongoing
12(i)	Notify South Coast AQMD of flux chamber test date for each test	At least 14 days prior to the scheduled test	Ongoing
13	Expand gas well system	9/7/2023; ongoing	Ongoing
14	Address wells with temps above 170 degrees Fahrenheit	9/7/2023; ongoing	Ongoing
14	Monitor each LFG system well for temperature at least monthly	9/7/2023; ongoing	Ongoing
14	Continue to operate all wells despite temperature exceedances as necessary	9/7/2023; ongoing	Ongoing
14(a)	Ensure the operation of the collection system equipment does not result in the release of raw landfill gas or condensate into the atmosphere	1/18/2024; ongoing	Ongoing

Condition No.	Key Action	Start Date/Deadline	Status
14(b)	Report breakdowns or malfunctions of the collection system resulting in the emission of raw landfill gas within one hour after occurrence or within one hour of the time said person knew or reasonably should have known of its occurrence. Take immediate remedial measures to correct the breakdown or malfunction and prevent further emissions	1/18/2024; as needed	Ongoing
15	Add vertical dual extraction wells	9/7/2023; ongoing	Ongoing
15	Expand well-field	9/7/2023; ongoing	Ongoing
15	Document subsequent additions to the wellfield	9/7/2023; ongoing	Ongoing; see Condition 8 monthly reports
15(b)(iv)	Conduct corrective actions and remonitoring/resampling if any reading of 500 ppmv TOC or greater is detected during instantaneous surface monitoring required by Condition 10	8/28/2024; as needed	Ongoing
15(b)(v)	Conduct corrective actions and remonitoring/resampling if any reading of 25 ppmv TOC or greater is detected during integrated surface sampling required by Condition 9	8/28/2024; as needed	Ongoing
15(b)(vi)	Extensions to the well installation timelines under Condition 15(b)(iv) and (v) may be requested in writing	8/28/2024; at least 7 days prior to the 30-day well installation deadline	Ongoing
15(c)	Notify South Coast AQMD which wells are scheduled to be installed the following week	1/18/2024; ongoing	Ongoing
15(e)	Use a landfill gas control box vented to an approved emissions control system while drilling a new well	1/18/2024; ongoing	Ongoing
15(f)	Complete and cap each well the same day its construction commences unless the well hole is completely covered or the subsequently installed pipe is capped	1/18/2024; ongoing	Ongoing
15(g)	Connect each well to an operating header or seal the ends of the well with blind flanges, glued or fused caps, or other approved seals as soon as the well is installed	1/18/2024; ongoing	Ongoing

Condition No.	Key Action	Start Date/Deadline	Status
15(h)	Properly cover and seal all openings and connections of the collection system in accordance with Title V permit and all applicable rules and regulations	1/18/2024; ongoing	Ongoing
15(i)	Install additional stainless steel, carbon steel, or CPVC wells in the Reaction Area	1/18/2024; ongoing	Ongoing
15(l)	Install well boots seals on all wells in Reaction Area	1/18/2024; ongoing	Ongoing
15(m)	Submit semi-annual as-built drawings in duplicate to South Coast AQMD	1/18/2024; semi-annually	Ongoing
15(n)	All new vertical wells installed in the Reaction Area must be dual extraction wells	4/25/2024; ongoing	Ongoing
15(n)	For 75% of wells, install dewatering infrastructure within 30 days of completion of well drilling	4/25/2024; ongoing	Ongoing
15(n)	For 25% of wells, install dewatering infrastructure within 60 days of completion of well drilling	4/25/2024; ongoing	Ongoing
15(o)	Determine whether any of the existing landfill gas collection wells in the Reaction Area which were not able to be drilled and installed at the desired depth can be drilled deeper to achieve the desired depth or new replacement wells can be drilled nearby; report in Condition 8 reports	10/21/2024; ongoing	Ongoing; see Condition 8 monthly reports
17, 17(a)	Expediently dewater wells to the maximum extent feasible; take proactive measure to remove additional liquids in the Reaction Area	3/22/2024; ongoing	Ongoing; see Condition 8 monthly reports
18	Implement proposed Reaction Area dewatering guidelines and implementation procedures	12/5/2023; ongoing	Ongoing
18	Implement revised dewatering guidelines to the maximum extent feasible	Within 7 days of approval of revised guidelines; ongoing	Ongoing
22	Continue using portable thermal oxidizer(s) until Reaction Committee concludes they are no longer needed; notify South Coast AQMD within 48 hours of determination	9/7/2023; ongoing	Ongoing
23	Continue to use Flares 1 and 2 until Flare 5 is permitted and operational	8/28/2024; ongoing	Ongoing

Condition No.	Key Action	Start Date/Deadline	Status
24	Operate and maintain the landfill to prevent standing leachate and the pooling or ponding of leachate exposed to the atmosphere	1/18/2024; ongoing	Ongoing
24	If pooling or ponding of liquid/leachate occurs, immediately collect and contain it in a sealed tanker truck or leachate tank, or promptly perform repairs to redirect the leachate into the leachate collection system	1/18/2024; ongoing	Ongoing
25	When encountering a discharge of pressurized leachate, mitigate odors and the dispersion and exposure of leachate into the atmosphere to the maximum extent possible. Once the discharge of pressurized leachate ends, remove soil saturated with leachate or add dry soil cover	1/18/2024; ongoing	Ongoing
27(a)	Measure, record, and report on leachate temps within all the 6-inch pipes feeding into the onsite frac tanks and at the piping leading into all tank farms, including a map of the monitoring locations and the tanks/tank farms downstream of the monitoring locations	4/25/2024; ongoing	Ongoing; see Condition 8 monthly reports
27(b)	Conduct and document inspections for leachate seeps twice each calendar day	1/18/2024; ongoing	Ongoing; see Condition 8 monthly reports
27(c)	Compile and report the details of the inspection logs, including any ongoing leachate seepage and pooling	1/23/2024; weekly	Ongoing; see weekly leachate inspection reports
27(d)	Measure and record quantities of leachate sent offsite for disposal/treatment	1/18/2024; ongoing	Ongoing; see Condition 8 monthly reports
27(d)	Submit copies of leachate manifests to South Coast AQMD within 3 weeks of request	1/18/2024; as requested	Ongoing
27(d)	If Chiquita begins onsite leachate treatment, record on a weekly basis quantities of leachate collected and treated onsite	1/18/2024; ongoing	Ongoing
27(e)	Report leachate leaks or spills to South Coast AQMD within 48 hours of discovery	8/28/2024; modified 4/16/2025; as needed	Ongoing

Condition No.	Key Action	Start Date/Deadline	Status
27(f)	Conduct daily inspections of leachate tanks, tank connections, ports, valves, tank hoses, and any equipment associated with leachate tank filling/emptying operations	8/28/2024; daily	Ongoing
27(g)	Do not overfill leachate collection/storage tanks or liquid treatment tanks	11/14/2024; ongoing	Ongoing
28	Operate and maintain the landfill gas and liquids systems with materials capable of handling gases/liquids at the temps measured. Utilize casing materials for elevated temp wells as agreed upon with the LEA	1/18/2024; ongoing	Ongoing
28	Provide information pertaining to installed equipment and specifications to SCAQMD upon request	1/18/2024; ongoing	Ongoing
29	Ensure proper capacity to accumulate leachate and landfill gas condensate onsite and/or dispose of it at appropriate facilities	3/22/2024; modified 11/13/2024; ongoing	Ongoing
30	Visually inspect landfill cover and geosynthetic cover in and around the Reaction Area, and any additional geosynthetic cover installed on site; repair landfill cover and geosynthetic cover within 2 hours of identification, safety permitting, or schedule permanent repair of geosynthetic cover immediately and permanently repair as soon as possible; maintain log of cover repairs	4/25/2024; modified 6/24/2024; ongoing	Ongoing; see Condition 8 monthly reports
30	Any repair of the geosynthetic cover which includes addition of new material must be done using an EVOH of at least 60-mil thickness, or, if EVOH is unavailable and repair is on or before three months from the date DTSC approves the EVOH, an HDPE membrane of at least 60-mil thickness	6/25/2025; ongoing	Ongoing
33	Expand and enhance current ambient air monitoring program pursuant to DPH's direction	9/7/2023; ongoing	Ongoing
33	Submit ambient air monitoring reports for DPH to South Coast AQMD	9/7/2023; as needed	Ongoing

Condition No.	Key Action	Start Date/Deadline	Status
34	Provide South Coast AQMD access to all real-time continuous monitoring data for PM2.5, PM10, H2S, recorded at all monitoring stations	1/19/2024; ongoing	Ongoing
34	Provide South Coast AQMD access to all real-time continuous monitoring data for TRS and TAC recorded by the enhanced monitors	1/19/2024 or within 5 calendar days after enhanced monitors are brought online; ongoing	Ongoing
34(a)	Ensure weekly 24-hour time-integrated canister samples for benzene, continuous H2S, and methane, and all hourly microGC DMS and VOC concentration data from current and future fence line and community monitoring sites are posted to and accessible at Chiquita's webpage and provide link to download historical data in a compiled, usable format	11/14/2024; ongoing	Ongoing
34(a)	Ensure that weekly benzene and live H2S and methane data from the offsite monitors and/or 24-hour samples are posted on the webpage in graphical format with a dashed/dotted line for RELs	11/14/2024; ongoing	Ongoing
34(b)	Provide weekly data collected by the offsite monitors on Chiquita's Odor Mitigation webpage in downloadable format	2/16/2024; ongoing	Ongoing
34(b)(i)	Provide flags or other visual indicators of missing air monitoring or test data on the website and document the range of dates/times with missing or affected data and the reason for the missing or affected data	3/29/2024; ongoing	Ongoing
34(c)	Ensure the template for all automatic air monitoring exceedance notifications are written in coordination with and approved by South Coast AQMD	12/10/2025; ongoing	Ongoing
34(d)	Investigate any measurement which results in an exceedance notification as defined in Condition No. 34; submit a preliminary report of the investigation	12/10/2025; ongoing	Ongoing

Condition No.	Key Action	Start Date/Deadline	Status
	and findings within 1 business day; submit full documentation of the investigation within 4 business days		
34(e)	For any measurement that results in an exceedance notification pursuant to Condition No. 34, the entity/ies retained under Condition No. 34(e) must provide instrument data and a data validation/invalidation recommendation to Chiquita	12/31/2025; ongoing	Ongoing
34(f)	For any measurement that results in an exceedance notification pursuant to Condition No. 34, the entity/ies retained under Condition No. 34(f) must provide instrument data and a data validation/invalidation recommendation to Chiquita	12/31/2025; ongoing	Ongoing
35	Provide updates to the QA/QC documents, a calibration log, and maintenance activities performed	1/18/2024; ongoing	Ongoing; see Condition 8 monthly reports
35(a)	Provide South Coast AQMD with the same access as Chiquita to onsite and offsite monitoring equipment	1/18/2024; ongoing	Ongoing
35(a)	Provide South Coast AQMD list of appropriate PPE within 24 hours of request	1/18/2024; as needed	Ongoing
35(b)	Implement quality control measures as specified by South Coast AQMD within 30 days of notification	4/25/2024; as needed	Ongoing
38	Take at least one representative sample of liquids from the Reaction Area and one from the bottom tanks and analyze per USEPA Method 624.1 for VOCs and TACs	1/18/2024; monthly	Ongoing
38	Post leachate analytical results on website and provide to South Coast AQMD within 1 week of receipt from contract lab	1/18/2024; ongoing	Ongoing
39	Maintain Odor Mitigation webpage; update weekly	9/7/2023; weekly	Ongoing
39	Translate Odor Mitigation webpage and reports into Spanish; submit reports to translation service within 2 business days of posting on webpage and upload	4/25/2024; ongoing	Ongoing

Condition No.	Key Action	Start Date/Deadline	Status
	to webpage within 2 business days of receipt from translation service		
40	Host community information meetings monthly based on receipt of NOV's	9/14/2023; ongoing	Ongoing
42	Implement additional mitigation measures while conducting non-exempt Rule 1150 excavation activities until final approval of Rule 1150 landfill excavation plan	1/18/2024; modified 8/27/2024; as needed	Ongoing
42(a)	Notify South Coast AQMD at least two days before and within five days after completion of excavation activities while conducting non-exempt Rule 1150 excavation activities until final approval of Rule 1150 landfill excavation plan	1/18/2024; as needed	Ongoing
42(v)	Post a notice on the front page of the main website and notify in writing all addresses located within 1 mile of the excavation area at least 48 hours in advance of planned excavation commencement. For unplanned excavation, or excavation where there is insufficient time to provide 48 hours' written notice, and such excavation is expected to last more than one day, post a notice on the website as soon as possible, not to exceed two business days. Submit notice to South Coast AQMD	8/28/2024; as needed	Ongoing
42(w)	Conduct ambient air quality sampling within two hours of receipt of a Rule 402 NOV during excavation or when a distinct odor (level 3 or greater) resulting from the excavation is detected at or beyond the property line and analyze for TOC and speciated TOCs	8/28/2024; as needed	Ongoing
42(x)	During excavation, conduct ambient air quality sampling for TOC and speciated TOC at least once between the hours of 6:00am and 11:00am, and at least once between the hours of 2:00pm and 6:00pm	8/28/2024; as needed	Ongoing
44	Maintain onsite MET station in the Reaction Area	10/31/2023; ongoing	Ongoing

Condition No.	Key Action	Start Date/Deadline	Status
45	Maintain and operate 1,000 feet or more of Semi-Permanent Vapor Odor Control in the Reaction Area	9/20/2023; ongoing	Ongoing
46, 47	Operate and maintain a landfill perimeter odor control misting system	9/7/2023; ongoing	Ongoing
50	Follow the direction of EPA to implement the Master Work Plan submitted to EPA under the UAO	4/25/2024; ongoing	Ongoing
51	Permit South Coast AQMD personnel to conduct inspections deemed necessary, including sample collection	1/18/2024; ongoing	Ongoing
51	When South Coast AQMD observes uncontrolled liquid that may be leachate during an inspection, collect a sample within 24 hours, submit for expedited testing for VOCs, and submit test results within 24 hours of receipt of results (but no later than 96 hours after collection)	3/22/2024; as needed	Ongoing
51	Provide South Coast AQMD with any updates to the Health and Safety Plan within 1 business day of updates going into effect	4/25/2024; as applicable	Ongoing
51(a)	To the extent required by the Health and Safety Plan, maintain onsite at least two 5-gas monitors for regulatory personnel to use	3/22/2024; ongoing	Ongoing
52	Host meetings between South Coast AQMD technical staff and Chiquita's technical consultants	1/18/2024; modified 8/27/2024; biweekly	Ongoing
53	Submit report on leachate tank numbers and quantities of liquid collected and treated	4/3/2024; modified 12/9/2025; monthly beginning 12/22/2025	Ongoing; see Condition 8 monthly reports
54	Collect, convey, and store flare condensate separate from leachate; no mixing of flare condensate and leachate	3/22/2024; ongoing	Ongoing
65	Provide South Coast AQMD with a summary of leachate dewatering pump installation activities	3/29/2024; weekly	Ongoing
66	Monitor temperature and pressure at landfill gas collection wells within the Reaction Area	September 2024; twice monthly	Ongoing
68	Report daily pressure readings	7/10/2024; modified	Ongoing; see Condition 8 monthly reports

Condition No.	Key Action	Start Date/Deadline	Status
		8/27/2024; monthly	
68	Maintain tanks under negative pressure	8/28/2024; ongoing	Ongoing
69	Inspect and monitor piping materials for structural concerns; record monitoring activity and work performed to resolve any issues	7/19/2024; quarterly	Ongoing
72(a), (b)	Sample and analyze vapor flow in the piping used to vent the leachate tanks and landfill gas condensate tanks; submit results in monthly Condition 8 reports	10/17/2024; quarterly	Ongoing; see Condition 8 monthly reports
72(b)	Submit final source test report for vapor flow testing	11/15/2024; quarterly	Ongoing
72(e)	Report flow rate, flow meter location, related tank farm, and indication of each tank within the tank farm vented and represented in the flow rate to South Coast AQMD	7/19/2024; daily	Ongoing; see Condition 8 monthly reports
73	Submit a permit application for any internal combustion engine equipment rated greater than 50 HP brought onsite that does not already have a valid SCAQMD permit or for which a permit application was not submitted prior to 6/30/2024	6/30/2024; as applicable	Ongoing
74	Expedite the procurement of the equipment needed to construct Flare No. 4	8/28/2024; ongoing	Ongoing
75(h)-(j)	Maintain onsite records documenting actions performed to resolve issues as a result of the RMS; inspection and maintenance activities; and equipment downtime. Provide upon request	10/31/2025; ongoing; as requested	Ongoing
76	Install sample ports on new equipment brought on site that requires sampling	8/28/2024; as needed	Ongoing
77	Conduct aerial surveillance monitoring over the Reaction Area; conduct follow-up field inspections as needed within 2 hours of becoming aware of aerial surveillance exceedances; implement corrective actions as needed within 2 calendar days	6/25/2025; weekly	Ongoing

Condition No.	Key Action	Start Date/Deadline	Status
77	Conduct aerial surveillance monitoring over entire landfill surface; conduct follow-up field inspections as needed within 2 hours of becoming aware of aerial surveillance exceedances; implement corrective actions as needed within 2 calendar days	6/25/2025; monthly	Ongoing
77	Provide raw data used to create the documents required by Condition 77	12/10/2025; ongoing within 5 working days of request	Ongoing
77	Develop and submit maps of aerial surveillance monitoring data and additional required information in monthly Condition 8 reports	6/25/2025; modified 12/9/2025; ongoing in monthly reports	Ongoing; see Condition 8 monthly reports
78	Inspect the sheeting/membrane liners under the tanks twice daily, at the beginning and end of the day	4/17/2025; twice daily	Ongoing
78	Maintain the sheeting/membrane liners under the tanks free of tears, rips, etc.	4/17/2025; ongoing	Ongoing
78	Record inspection and maintenance records for liners under the tanks	4/17/2025; ongoing	Ongoing
78	Once the 60-mil geosynthetic liner is installed, inspect it at least twice-daily; record inspection and maintenance records	Modified 4/16/2025; ongoing	Ongoing
78	Install a 60-mil liner overlaying two feet of compacted soil lining the bottom and 5 feet off the sides of the perimeter of each leachate tank and/or tank farms, except for driving lanes required for trucks to access leachate tanks for leachate disposal or other routine operations or maintenance	4/16/2025; ongoing	Ongoing
79	Submit any permit applications, source test protocols, source test reports, and any other submittal requiring South Coast AQMD review and approval, with an expedited processing/review requested, along with any associated fees, forms, and information required	8/28/2024; ongoing	Ongoing
80	Whenever South Coast AQMD permitted Various Location equipment or PERP permitted equipment is brought or operated on site, provide notice to	8/28/2024; as needed	Ongoing; see Condition 8 monthly reports

Condition No.	Key Action	Start Date/Deadline	Status
	South Coast AQMD, maintain a daily log, and submit the daily log in the Condition 8 report		
81	Post an alert on the main website whenever any landfill gas collection and control equipment has planned or unplanned downtime anticipated to last 30 minutes or more, or once any downtime has a duration of 30 minutes or longer	8/28/2024; as needed	Ongoing
82	Notify South Coast AQMD whenever any landfill gas collection or control equipment has scheduled and/or unplanned downtime lasting 30 minutes or longer	8/28/2024; modified 11/13/2024; as needed	Ongoing
86(a)	Maintain and keep liquid treatment and storage equipment operating on site in good operating condition at all times in accordance with manufacturer's recommendations and industry best management practices	8/28/2024; until approval of the leachate treatment/storage permits	Ongoing
86(b)	Operate and maintain the liquid treatment and storage equipment by personnel properly trained in its operation	8/28/2024; until approval of the leachate treatment/storage permits	Ongoing
86(b)	Maintain training and qualification documentation regarding personnel operating the liquid treatment and storage equipment onsite and provide to South Coast AQMD upon request	8/28/2024; until approval of the leachate treatment/storage permits	Ongoing
86(c)	The operation of the equipment must not result in the release of any raw landfill gas, or discharge of odorous liquid vapors into the atmosphere, except for when collecting samples from leachate treatment equipment	8/28/2024; until approval of the leachate treatment/storage permits	Ongoing
86(d)	The liquid treatment system, leachate tanks, sludge/solids handling equipment and tanks, and any other equipment associated with the treatment or storage processes must be fully enclosed, under vacuum, and vented to appropriate control (i.e., flare station)	8/28/2024; until approval of the leachate treatment/storage permits	Ongoing

Condition No.	Key Action	Start Date/Deadline	Status
86(e)(i)	Inspect any liquid treatment system equipment under positive pressure for vapor leaks using a calibrated photoionization detector (PID)	8/28/2024; until approval of the leachate treatment/storage permits	Ongoing
86(e)(ii)	Repair vapor leaks within 1 calendar day of detection	8/28/2024; until approval of the leachate treatment/storage permits	Ongoing
86(e)(iii)	Log all vapor leak inspections in a log	8/28/2024; until approval of the leachate treatment/storage permits	Ongoing
86(e)(iii)	Keep and maintain records of vapor leak inspections for a minimum of 5 years and make them available to South Coast AQMD upon request	8/28/2024; ongoing	Ongoing
86(f)	Dedicated piping connected to the liquid treatment system, leachate tanks, solid handling tanks, and any other equipment associated with the treatment or storage process must be used for the sole purpose of providing vacuum to the leachate treatment equipment	8/28/2024; until approval of the leachate treatment/storage permits	Ongoing
86(g)	Monitor sample ports at least daily for CH ₄ %, CO concentration (ppmv), CO ₂ %, and O ₂ %, flowrates, and pressures	8/28/2024; until approval of the leachate treatment/storage permits	Ongoing
87	Do not conduct planned landfill gas combustion/control equipment downtime for three or more units (flares/TOX) at any one time, unless approved by SCAQMD or where Chiquita is conducting work under a specified scenario that requires the gas flow to be cut off from the flares	11/14/2024; ongoing	Ongoing
88(b)	Maintain the existing flare station generators for the purpose of backup power at the flare station	12/31/2024; ongoing	Ongoing
88(b)	Minimize the combustion/control equipment downtime as a result of	12/31/2024; ongoing	Ongoing

Condition No.	Key Action	Start Date/Deadline	Status
	power failure, and complete start up cycles in the prescribed time frames unless documented inaccessibility or dangerous conditions		
89	For any equipment for which Chiquita has submitted a permit application not covered under Condition 86, and for any equipment for which Chiquita is required to submit a permit application to SCAQMD, until the final approval of the permit application, properly maintain and keep in good operating condition the equipment and associated ancillary parts, and the equipment shall be operated and maintained by personnel properly trained in its operation	11/14/2024; ongoing	Ongoing
92	Submit any file(s) with a cumulative size larger than 35 MB via a shared link	11/14/2024; ongoing	Ongoing
93	Monitor and communicate leachate storage tank level information before and during tank filling operations	6/30/2025; ongoing	Ongoing
97	Visually inspect all connection points, seams, and seals of the geosynthetic cover (s) in and around the Reaction Area at least once every 7 calendar days, promptly repair any cover issues identified, and maintain a related log	4/16/2025; ongoing	Ongoing; see Condition 8 monthly reports
98(c)	Do not open any air release valve that does not have a fully installed and operational liquid and vapor collection receptacle unless otherwise approved in writing by South Coast AQMD	12/10/2025; ongoing until liquid and vapor collection receptacle is installed	Ongoing
98(d)	Inspect air release valves and associated liquid and vapor collection receptacles; repair all leaks within 1 day of detection; and maintain inspection records	12/10/2025; ongoing at least once every 14 days	Ongoing
99	All liquid/leachate transfers between stationary leachate storage tanks and leachate tanker trucks shall be performed via bottom loading to the maximum extent feasible	12/21/2026; ongoing	Ongoing

101	Deposit all construction spoils at an appropriate disposal site within 1 hour of generation	12/10/2025; ongoing	Ongoing
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Future Actions

Condition No.	Key Action	Start Date/Deadline	Status
83(a)	Conduct a continued study of specific landfill operational events and their potential emission impacts; prepare and submit report detailing the landfill operational events, data, and study findings	1/30/2026	In progress
36(d)	Procure an additional microGC and 2 additional sensor modules to be used as spares	3/31/2026	
36(d)	Maintain the additional microGC in operational condition and available for immediate deployment once determined that a monitoring network instrument has failed	3/31/2026; ongoing	
75(f)	Reaction Committee to conduct feasibility assessment and submit final report on results and recommendations on further RMS deployment with at least 3 months of data collection	4/17/2026	
27(f)(ii)	Review and revise the SOPs developed under Condition No. 27(f)	7/9/2026; ongoing at least every 6 months	
27(f)(ii)	Implement the revised SOPs developed under Condition No. 27(f)	7/9/2026; ongoing at least every 6 months	
15(b)(iii)	If vertical wells cannot be installed to the desired depth in accordance with the deadlines laid out in Condition 15(b)(i) and (ii), install vertical landfill gas extraction wells with the desired depth within the waste mass at the requisite well installation density in the Condition 9(a) Reaction Area	8/17/2026	
98	Install a passive liquid and vapor collection receptacle on all air	10/30/2026	

Condition No.	Key Action	Start Date/Deadline	Status
	release valves installed on the leachate/condensate piping; prioritize installing on lines which move characteristically hazardous liquids		
4	Once Flare 4 is in operation, prioritize Flare 3 and Flare 4 over Flare 1 and Flare 2	Once Flare 4 is in operation	
15(d)	Notify South Coast AQMD at least 1 week in advance when an additional well or set of wells and associated piping will be installed	Following installation of Condition 15(a) and (b) wells	
15(d)	Provide updates to the design and schedule for the additional wells	Following installation of Condition 15(a) and (b) wells	
15(j)	Replace any wells in the Reaction Area which are damaged, blocked, pinched, or have temps exceeding 145 degrees F	Following installation of Condition 15(a) and (b) wells; as needed	
15(j)	Notify South Coast AQMD of proposed installation schedule for replacement of damaged, blocked, pinched, or high temp wells	Following installation of Condition 15(a) and (b) wells; within 7 days of discovery	
15(j)	Install replacement well within 7 days of notification; update South Coast AQMD every 7 days until installation is complete	Following installation of Condition 15(a) and (b) wells; within 7 days of notification	
15(k)	Operate gas extraction wells with less than 3% oxygen and follow BMPs to keep oxygen below 5% in interior wells	Once additional/adequate gas extraction capacity is installed	
27(f)(i)	Respond and/or submit further revised SOPs under Condition No. 27(f) based on comments from South Coast AQMD	Within 15 days of receiving South Coast AQMD comments on revised Condition 27(f) SOPs	
27(f)(ii)	Respond and/or submit further revised SOPs under Condition No. 27(f) based on comments from South Coast AQMD	Within 15 days of receiving South Coast AQMD comments on revised SOPs under Condition No. 27(f)	
29	Comply with the Leachate Management Plan submitted to EPA under the UAO once approved by EPA	After EPA's approval of Leachate Management Plan	

Condition No.	Key Action	Start Date/Deadline	Status
34(c)(i)	Put the text-based notification system defined in Condition No. 34(c) into effect	Within 3 business days of direction from South Coast AQMD	
50	Submit monthly progress reports submitted to EPA under the UAO to South Coast AQMD	After EPA's approval of the Master Work Plan	
55	Conduct source testing and obtain South Coast AQMD approval prior to injection of flare condensate	Prior to injection of flare condensate	
55	If injection of flare condensate begins, maintain and submit records of condensate sampling/analysis and injection flows	If injection of flare condensate begins; monthly	
66(a)(vi)	Conduct the feasibility assessment of the remote monitoring system which measures temperature and pressure within a well with a pump located within the Reaction Area	Upon South Coast AQMD approval of the proposal	
66(a)(vi)	The Reaction Committee must submit a report on the results of the feasibility study and recommendations on further deployment of the remote monitoring system	No later than 150 days from South Coast AQMD approval of the proposal	
84	Complete the installation of windbreaks and/or wind flow disruptors if the Reaction Committee determines them to be technically feasible and South Coast AQMD determines them to be viable	Within 180 days after receipt of written approval by South Coast AQMD or 180 days after required regulatory approvals have been procured, whichever is later	
90	Submit a permit modification application for the Landfill Gas Condensate and Leachate Collection/Storage System	Within 30 days, or earlier, of DTSC final approval of written workplan for the permanent relocated tank farm; modified 4/16/2025 and 12/9/2025	
91	Submit a permit application for each hazardous and non-hazardous liquid treatment system	Within 30 days, or earlier, of DTSC final approval of written workplan for the permanent relocated tank farm; modified 4/16/2025 and 12/9/2025	

Condition No.	Key Action	Start Date/Deadline	Status
100	Incorporate South Coast AQMD comments, if any, on vapor recovery system feasibility assessment proposal or provide detailed justification for not incorporating the comments	Within 15 days of receipt of South Coast AQMD comments	
100	Conduct the vapor recovery system feasibility assessment and submit a final report; if Chiquita determines such a system is feasible, include a workplan for the installation and operation of the leachate vapor recovery and control equipment and related installations	Within 150 days of South Coast AQMD approval	

ATTACHMENT H

Milestones Required by the June 6, 2024 Local Enforcement Agency Compliance Order

(chart modified on January 30, 2026)

Milestone #	Key Action	Start Date/Deadline	Status
1A-1	Submit a revised soil reaction break/barrier plan (SRBBP)	Superseded	The LEA issued a second Compliance Order on May 1, 2025, which, per the LEA, supersedes this Milestone 1A-1. Chiquita submitted a request for a formal appeal hearing and a petition for stay of Section 4.3 of the second Compliance Order on May 16, 2025. Chiquita's petition for stay was denied on May 20, 2025; a hearing to establish procedures for the substantive hearing occurred on August 27, 2025; the substantive hearing originally scheduled for January 2026 has been rescheduled for March 18 and April 28, 2026. The new mitigation measures are set forth in a separate chart below.
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 regarding the selection of wells; 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 for installation of the initial set of temperature monitoring probes; see report on Chiquita's website
1B-2	Submit weekly temperature monitoring probe data reports	June 7, 2024; weekly, every Thursday	Ongoing; 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	No longer required	LEA is no longer requiring Chiquita to install the three TMPs described in the LEA's June 6, 2024 Compliance Order, according to LEA letter dated January 10, 2025
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; LEA approved in letter dated April 9, 2025 contingent on submittal of additional information, which Chiquita provided on May 10, 2025
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 in accordance with this milestone
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 these weekly updates on Chiquita's website, in addition to the monthly cracks and fissures summaries, monthly isopach map, and related FLIR surveys also on Chiquita's website. On September 9, 2025, Chiquita submitted the final required bi-monthly FLIR survey and analysis and requested reduction in frequency to quarterly; LEA acknowledged receipt of request on November 5, 2025
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	July 31, 2024	Completed

	extraction wells as per approved February 26, 2024 Remediation Plan for LFG Exceedance		
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; under LEA review
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 Chiquita's 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 compliance period that begins after the completion of the planned LFG extraction well construction referred to in the February 2024 Remediation Plan	November 28, 2024 (120 days after completion of the LFG extraction well installation); weekly update, every Wednesday	In progress; extension requested on September 25, 2024, and, in response to LEA input, extension requested again together with additional proposed measures as part of a Revised Remediation Plan submitted on November 18, 2024; additional information requested by LEA on February 21, 2025; Chiquita provided the additional information on March 14, 2025; received additional input from LEA on May 1, 2025, requiring Revised Remediation Plan by June 2, 2025; Chiquita submitted a further Revised Remediation Plan on June 2, 2025; LEA conditionally approved in letter dated August 5, 2025; Chiquita submitted response on October 1, 2025; Chiquita is providing a weekly status update on its installation of the SVEs in response to request from LEA on November 20, 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
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Mitigation Measures Required by the May 1, 2025 Compliance Order

(chart modified on January 30, 2026)¹

Mitigation Measure	Key Action	Start Date/Deadline	Status
Section 4.1	Extend geomembrane cover and submit plan for completion, including schedule for completion	Plan due June 2, 2025; installation in progress	Subject to request for a formal appeal hearing; draft workplan submitted on June 2, 2025; LEA conditionally approved and provided comments in letter dated August 1, 2025, imposing deadline of August 18, 2025 to submit installation schedule; Chiquita responded and requested extension of deadline in letter dated August 18, 2025 in order to revise workplan in response to comments received from DTSC; revised draft workplan submitted on October 3, 2025; installation of additional cover is in progress; received LEA comments on draft workplan on November 20, 2025; Chiquita responded to LEA comments on December 15, 2025; under discussion with LEA
Section 4.1	Submit weekly status updates on the extension of the geomembrane cover	Weekly, every Friday, beginning the week after installation commences	Subject to request for a formal appeal hearing; installation has commenced and is in progress; updates are ongoing; see weekly updates on Chiquita's website
Section 4.2	Relocate Tank Farm 9 and submit workplan for relocation	Workplan due June 2, 2025; further deadlines TBD	Subject to request for a formal appeal hearing; draft workplan submitted on June 2, 2025; revised workplan submitted on September 19, 2025 in

¹ As noted above, Chiquita submitted a request for a formal appeal hearing and a petition for stay of Section 4.3 of this Compliance Order on May 16, 2025. Chiquita's petition for stay was denied on May 20, 2025; the substantive hearing originally scheduled for January 2026 has been rescheduled for March 18 and April 28, 2026.

			response to comments received from DTSC; received LEA comments on draft workplan on November 20, 2025; under discussion with LEA
Section 4.3	Submit as-built for soil barrier or a workplan for construction of a vertical barrier to prevent expansion of SET event into Cell 8A, including schedule for completion	As-built or workplan due July 15, 2025; further deadlines TBD	Subject to request for a formal appeal hearing; draft workplan submitted on July 15, 2025; received LEA comments on draft workplan on November 20, 2025; under discussion with LEA; shared Chiquita's response to DTSC's and CalRecycle's comments on the draft workplan with LEA on November 22, 2025; formal appeal hearing regarding this workplan deferred per December 10, 2025 communication from LEA
Section 4.4	Install five additional TMPs (TPs 36-40) and submit final completion report with map	Final completion report due August 4, 2025	Subject to request for a formal appeal hearing; Chiquita requested extension to November 7, 2025 in a letter dated July 18, 2025; LEA rejected extension request on August 6, 2025; Chiquita responded to LEA and US EPA in a letter dated September 26, 2025; as of September 24, 2025, Chiquita has completed the drilling for all five TMPs; as of December 11, 2025, Chiquita has completed the drilling for TP-22, TP-23, and TP-33 and anticipates completing their installation by February 2026 and will submit the final completion report one week after completing installation of TP-22, TP-23, and TP-33.

ATTACHMENT I

Action Items Required by the United States Environmental Protection Agency

Unilateral Administrative Order (chart modified on January 30, 2026)

Completed Work

Paragraph #	Key Action	Start Date/Deadline	Status
94	Request a conference with EPA to discuss UAO or notify EPA that Chiquita intends to submit written comments or a statement of position in lieu of requesting a conference.	February 23, 2024	Completed
98	Notify EPA of Chiquita's intent to comply with UAO.	February 26, 2024	Completed
18	Designate a Project Coordinator responsible for administration of Work under UAO.	February 28, 2024; updated September 9, 2025	Completed
6	Provide a copy of UAO to all contractors, subcontractors, laboratories, and consultants that are retained to conduct or monitor any portion of the Work performed pursuant to UAO.	March 4, 2024; October 16, 2024	Completed
25	Develop and submit a Health and Safety Plan.	March 21, 2024	Completed
17	Notify EPA of the names, contact info, and qualifications of the contractors, subcontractors, consultants, and laboratories to be used in carrying out the Work.	March 27, 2024	Completed
76-79	Submit initial cost estimates.	April 26, 2024; revised June 11, 2024 and July 2, 2024	Completed
22(c)(1)	Submit revised Leachate Management Plan (part of Master Work Plan).	May 4, 2024; revised August 2, 2024 and January 10, 2025	Completed
22(c)(6)	Submit revised Air Monitoring Plan (part of Master Work Plan).	May 7, 2024; updated May 17, 2024 and October 7, 2025	Completed
22(c)(2)	Submit revised Soil Reaction Break/Barrier Plan (part of Master Work Plan).	July 8, 2024; submitted additional data to LEA and EPA on January 2, 2025	Completed
22(c)(3)	Submit revised Cover Installation Plan (part of Master Work Plan).	July 9, 2024; revised January 14, 2025	Completed

Paragraph #	Key Action	Start Date/Deadline	Status
22(c)(5)	Submit revised Temperature Monitoring Plan (part of Master Work Plan).	July 17, 2024; response to Notice of Conditional Approval of the Temperature Monitoring Plan on March 18, 2025; Revised Temperature Monitoring Plan and response to Second Notice of Deficiency on September 25, 2025	Completed
30	Submit Data Management Plan.	July 17, 2024	Completed
80-86	Submit proposed financial assurance documents.	July 30, 2024	Completed
82	Submit approved financial assurance mechanisms.	September 19-20, 2024	Completed
22(c)(7)	Submit revised Off-Site Mitigation Prevention Plan.	September 25, 2024; updated March 27, 2025; approved May 1, 2025	Completed
73	Provide EPA with certificates of insurance and a copy of each insurance policy, naming EPA as an additional insured.	October 16, 2024 and October 15, 2025	Completed
73, 75	Certify to EPA that Chiquita's contractors and subcontractors have obtained the required insurance.	October 16, 2024; recertified December 31, 2024	Completed
24	Submit second revised Sampling and Analysis Plan and second revised ETLF QAPP.	January 23, 2025	Completed
90; U.S. EPA July 24, 2025 Letter	Work Plan for Additional Geomembrane Cover Work.	August 29, 2025; extension requested; revised October 3, 2025	Completed

Ongoing Work

Paragraph #	Key Action	Start Date/Deadline	Status
6	Provide a copy of UAO to all contractors, subcontractors, laboratories, and consultants that are retained to conduct or monitor any portion of the Work performed pursuant to UAO.	Ongoing	As needed; ongoing
6	Condition all contracts and agreements with contractors,	Prompt individual discussions with contractors following	As needed; ongoing

	subcontractors, laboratories, or consultants in connection with the UAO, on compliance with terms of the UAO. Ensure their compliance with UAO.	issuance of UAO; written confirmations sent August 5, 2024; ongoing, as needed	
17	Submit a copy of each proposed contractor's QMP and demonstrate their compliance with ASQ/ANSI E4:2014.	Ongoing; under discussion with EPA	Ongoing
17	Notify EPA of any additional retained contractors or subcontractors.	At least 5 days prior to commencement of Work	As needed; ongoing
22(a)	Immediately store, transport leachate solid and/or hazardous waste in accordance with RCRA, 42 U.S.C. 6900, et seq., and associated regulations. All hazardous waste shall be disposed of at a TSD preapproved by EPA.	February 26, 2024; ongoing	Ongoing
22(b), (c)	Provide a Master Work Plan subject to EPA's approval, including the following plans: - Leachate Management Plan - Soil Reaction Break/Barrier Plan - Cover Installation Plan - Slope Stability Analysis work plan - Collection of temperature data in/around Reaction Area - Air Monitoring Plan - Off-Site Migration Prevention Plan	March 27, 2024; ongoing	Submitted Plan and updates as noted above.
24	Submit a Sampling and Analysis Plan subject to EPA's approval, including a Field Sampling Plan and Quality Assurance Project Plans (QAPP).	March 27, 2024; November 15, 2024; January 23, 2025; ongoing	Response to EPA request for further information provided on June 10, 2025.

28	Prior to shipping hazardous substances, pollutants, or contaminants off site, obtain a prior determination from EPA and comply with RCRA and CERCLA requirements.	Prior to shipping hazardous substances, pollutants, or contaminants off site	As needed; ongoing
28	Provide written notice of out-of-state waste shipments to the appropriate state environmental official and to EPA. Notify state official and EPA of any major changes in shipment plan.	Prior to shipping waste material out of state	As needed; ongoing
28	Comply with the requirements of Paragraph 28(c) regarding shipment of Investigation Derived Waste off site.	Prior to shipping Investigation Derived Waste off-site	As needed; ongoing
39	Take all appropriate action to minimize emergency/threat.	In the event of an emergency or an action or occurrence that may present an immediate threat to human health and the environment	As needed; ongoing
39	Submit written notification of emergency/threat.	Within 3 days of discovery	As needed; ongoing
39	Submit and implement a plan to mitigate threat.	As needed	As needed; ongoing
40	Provide notification of a release that triggers release notification pursuant to CERCLA Section 103 or EPCRA Section 304 pursuant to Paragraph 40.	In the event of a release that triggers release notification pursuant to CERCLA or EPCRA	As needed; ongoing
41, 42	Use quality assurance, quality control, and other technical activities and chain of custody procedures for all samples. Ensure all laboratories meet the requirements of Paragraph 42 of the UAO.	Ongoing	Ongoing
49	All results of sampling, testing, modeling, or other data generated by Chiquita, or on Chiquita's behalf, must be validated by Chiquita and submitted to EPA promptly upon receipt.	Upon receipt of results	Ongoing

50	Notify EPA in advance of any sample collection activity.	Not less than 7 days prior to any sampling	Ongoing
53	Use best efforts to obtain all necessary access agreements.	As needed	As needed; ongoing
59-62	Preserve all documents/information, including raw data, relating to the Work, or relating to any solid waste or hazardous waste found at the Site, for 5 years following termination of UAO.	February 26, 2024; ongoing	Ongoing
59-62	Acquire and retain copies of all documents that related to the Site that are in possession of Chiquita employees, agents, accountants, contractors, or attorneys.	February 26, 2024; ongoing	Ongoing
73	Secure insurance as required by the UAO. Provide EPA with certificates of such insurance and a copy of each insurance policy, naming EPA as an additional insured, prior to commencing Work and annually thereafter on February 26.	October 16, 2024; ongoing/prior to commencing Work; annually	Ongoing
73, 75	Recertify to EPA that Chiquita's contractors and subcontractors have obtained the required insurance.	October 16, 2024; ongoing annually	Recertified at EPA's direction as of December 31, 2024; ongoing
73, 75	Ensure that Chiquita and its contractors and subcontractors satisfy all applicable laws and regulations regarding the provision of employer's liability insurance and worker's compensation insurance for all persons performing Work.	February 26, 2024; ongoing	Ongoing
76-79	Submit revised cost estimates.	Annually and as needed	Ongoing
80-86	Revise financial assurance and financial assurance mechanisms.	As needed	As needed; ongoing
88	Notify EPA Project Coordinators of any delay or anticipated delay in performing any requirement of the UAO.	Within 48 hours after Chiquita first knew or should have known of a delay	As needed; ongoing

88	Provide written notification of delay in accordance with Paragraph 88.	Within 7 days after notifying EPA of delay	As needed; ongoing
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Future Work

Paragraph #	Key Action	Start Date/Deadline	Status
27	Submit a final report summarizing actions taken to comply with UAO.	Within 15 days after completion of all Work required by UAO	
59-62	Notify EPA that documents and information are available for inspection and provide copies upon request.	After the end of the 5-year retention period and 90 days before any documents or information is destroyed	
22(c)(3)	Respond to EPA Notice of Deficiency regarding Response to EPA Notice of Deficiency and Update to Draft Removal Action Workplan: Extension of Covered Area	Meet and confer tentatively scheduled for January 30, 2026. Deadline for updates tentatively scheduled for 7 days following meet and confer.	

ATTACHMENT H

Action Items Required by the April 2, 2025 Department of Toxic Substances Control Imminent and Substantial Endangerment Determination and Order (chart modified on January 30, 2026)

Order ¶	Key Action	Start Date/Deadline	Status
5.1.3	Meet with DTSC to discuss response strategy.	April 9, 2025	Completed April 8, 2025
6.1	Submit the name, address, and telephone number of a Project Coordinator.	April 9, 2025; January 21, 2026	Completed April 9, 2025; change in Project Coordinator approved January 21, 2026
6.2	Submit the name, address, and resume of the project engineer or geologist chosen, and the statement of qualifications of the consulting firm responsible for the work.	April 9, 2025	Completed April 9, 2025
7	Provide written notice stating whether Respondents will comply with the Order's terms.	April 9, 2025	Completed April 9, 2025
6.25	Provide a copy of the Order to all contractors, subcontractors, laboratories, and consultants retained to conduct work performed under the Order within 15 days of the Order's Effective Date or the date of retaining services, whichever is later. Condition such contracts upon satisfactory compliance with this Order.	April 17, 2025	Completed April 17, 2025; ongoing as needed
6.3	Submit a Monthly Summary Report of activities conducted under the Order.	May 2, 2025 (on the 15th of every month thereafter)	Ongoing
5.1.2(a); 5.3; 5.4	Submit a draft removal action workplan (RAW) for extension of covered area; submit a revised draft RAW within 15 days of receiving comments or as otherwise directed by DTSC.	May 16, 2025 (extension granted 4/26/25); received comments 8/4/2025; revised draft due 10/3/2025 (extension granted 8/29/2025); received a notice with comments 12/26/2025 ¹ ;	Draft submitted May 16, 2025; revised draft submitted October 3, 2025; response to notice with comments submitted January 12, 2026; under discussion with DTSC

¹ Chiquita received from DTSC on December 26, 2025 a Notice of Proposed Determination of Noncompliance with Imminent and Substantial Endangerment Determination and Order (ISE Order) regarding the three RAWs previously submitted to DTSC, directing a response by January 5, 2026. Chiquita requested from DTSC on December 30, 2025

		response due 1/12/2026 (extension granted 12/31/2025); received a notice 1/26/26 ²	
5.1.2(b); 5.3; 5.4	Submit a draft RAW for interim relocation and stabilization of containerized waste; submit a revised draft RAW within 15 days of receiving comments or as otherwise directed by DTSC.	May 9, 2025 (extension granted 4/26/25); received comments 7/29/2025; revised draft due 9/19/2025 (extension granted 8/15/2025); received a notice with comments 12/26/2025; response due 1/12/2026 (extension granted 12/31/2025); received a notice 1/26/26	Draft submitted May 9, 2025; revised draft submitted September 19, 2025; response to notice with comments submitted January 12, 2026; under discussion with DTSC
5.1.2(c); 5.3; 5.4	Submit a draft RAW for protection of cell 8A from intrusion of SET event; submit a revised draft RAW within 15 days of receiving comments or as otherwise directed by DTSC.	July 1, 2025; received comments 10/15/25; revised draft due 10/30/25 (extension requested 10/24/25); received comments 10/15/2025; received a notice with comments 12/26/2025; response due 1/2/2026 (extension granted 12/31/2025); received a notice 1/26/26	Draft submitted July 1, 2025; responded to DTSC's comments with draft Master Schedule on November 21, 2025; response to notice with comments submitted January 12, 2026; under discussion with DTSC
5.4	Submit an implementation report documenting the implementation of the final RAW.	Within 30 days of completion of field activities	
5.6	Submit a one-year review workplan to describe inspection of the Site and evaluate the adequacy and integrity of the completed removal actions.	11 months from Implementation Report Date	
5.6	Conduct an inspection of the Site and evaluate the	1 year from Implementation Report date	

an extension of this deadline. Chiquita received the extension on December 31, 2025 and submitted its response on January 12, 2026.

² Chiquita received from DTSC a Final Determination of Noncompliance with, and Violation of, Imminent and Substantial Endangerment Determination and Order (ISE Order) regarding the three RAWs previously submitted to DTSC.

	adequacy and integrity of the completed removal actions.		
5.6	Implement the one-year review workplan and submit a comprehensive report of the results of the review.	Within 60 days of One-Year Review Workplan Approval	
5.2	Work cooperatively with DTSC in providing public notice of response actions at the Site.	4/2/2025; as needed	As needed; ongoing
5.9	Take all appropriate action to prevent, abate, or minimize an emergency, release, or immediate threat of release of a hazardous substance and immediately notify DTSC Project Manager.	Immediately following an emergency	As needed; ongoing
5.9	Submit a report summarizing the emergency and the measures taken in response.	Within 7 days of the onset of emergency	As needed; ongoing
6.4	Perform all sampling and analysis according to DTSC-approved QA/QC procedures.	As needed	As needed; ongoing
6.10	Provide DTSC with access to the Site upon request and use best efforts to secure access to other sites as necessary to effectuate this Order.	April 2, 2025; as needed	As needed; ongoing
6.11	Submit the data described in ¶ 6.11 in the specified format upon request.	Within 7 days of data request; received first request dated July 14, 2025; received request dated October 15, 2025; received notice December 12, 2025 ³ ; response due December 22, 2025	Submitted proposed data submission schedule July 21, 2025; provided access to Chiquita's raw data via SCS eTools on October 30, 2025 and RMC on November 3, 2025; provided substantial additional data and information in response to DTSC's further data requests on December 22, 2025 and December 23, 2025; ongoing as requested

³ Chiquita received from DTSC on December 12, 2025 a Notice of Proposed Determination of Noncompliance with the ISE Order, directing Chiquita to provide data and information pursuant to section 6.11 of the ISE Order by December 22, 2025. Chiquita provided the requested data and information on December 22, 2025, with additional data and information provided on December 23, 2025.

6.11	Inform DTSC of all field sampling conducted under the Order and allow DTSC to take duplicates of any samples collected.	7 days prior to field sampling	As needed; ongoing
5.11	Upon request, demonstrate to DTSC and maintain financial assurance for identified and approved operation and maintenance and monitoring activities.	Upon request	Upon request
6.12	Preserve all data, reports, and other documents after the conclusion of all activities under the Order and notify DTSC prior to destroying any document prepared pursuant to the Order.	Preserve 5 years after conclusion of all activities under Order; notify DTSC 6 months prior to destroying	Ongoing