

March 19, 2024

The South Coast Air Quality Management District (SCAQMD) Hearing Board,
21865 Copley Drive, Diamond Bar, Ca 91765

Dear The South Coast AQMD Hearing Board Members & The Clerk of The Board

CASE NO.6177- 4, SOUTH COAST AQMD (PETITIONER) vs. CHIQUITA CANYON LLC, (WASTE CONNECTION) A DELAWARE CORPORATION (RESPONDENENTS) – RESPONDENENT’S REQUEST FOR MODIFICATION OF AN EXISTING ORDER FOR ABATEMENT BEFORE THE HEARING BOARD OF THE SCAQMD – MARCH 21, 2024

My name is Mike Mohajer. I am a private citizen and a resident of the County of Los Angeles. I am also a California Professional Engineer and have been involved with environmental issues and specifically solid waste and hazardous waste management for over 43 years. For the record, I do not represent any public, private and/or governmental agency. I have been monitoring the efforts to put out the underground fire/smoldering at the Landfill. While I appreciate Chiquita Landfill LLC’s efforts to mitigate the problem, I am disturbed to find out the issue relating to fire/smoldering has been ongoing for almost two years without any appropriate action by the Chiquita Landfill and the regulatory agencies with the Landfill’s oversight authority. I strongly believe underground smothering of the on-going fire should be the number one priority to protect public health & safety. To expedite the process, Chiquita Landfill should at the earliest employ services of an engineering firm with **sufficient proven expertise** to address the fire situation and possibly by injection of carbon dioxide gas and/or liquid carbon dioxide insertion (emphasis added). This process will not be simple and will be hazardous to employees, but this may be a step in the right direction while the other efforts, including, but not limited to, odor mitigation, are ongoing. (emphasis added)

To assist the success of carbon dioxide gas injection and/or liquid carbon dioxide insertion, it is imperative to identify waste materials disposed at the site.

As I mentioned in my letter of **January 16,2024**, based on the “FINDING OF THE BOARD OF SUPERVISORS, dated July 25, 2017”, Chiquita Landfill was first used as a reclamation site in 1965 and the following year was allowed to operate as a refuse disposal. On November 24, 1982, the Los Angeles County Regional Planning Commission approved CUP 1809 for expansion of the existing Landfill with Class II and Class III disposal sites. Currently the Landfill operates as a Class III disposal site (non-hazardous waste) which was approved by the Board of Supervisors on May 22, 1997.

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Therefore, based on the forgoing, it appears that the Landfill may have partially operated as a Class II site during the period of 1982 to 1997. As a Class II site, the disposal of hazardous waste ("Designated Waste", as defined by the California Water Code, Section 13173) may have occurred. It is known that sulfide minerals can oxidize upon exposure to oxygen and water creating sulfurous acid and sulfuric acid causing the odor which may be emitted at the landfill's neighboring communities (such as the Val Verde Community). **Further** to provide the necessary tools needed to design the carbon dioxide gas injection and/or carbon dioxide liquid insertion system, it is imperative to have a good understanding of waste materials disposed at the site. As such, the landfill operator and the Los Angeles Regional Water Quality Board need to provide the involved regulatory agencies and the involved design and operating engineering firms with a copy of all **Waste Discharge Requirements {WDRs}**, emphasis added, issued by the LA Regional and/or state Regional Water Quality Control Board for the subject landfill and all surface impoundments at the site.

Thank you for your consideration, and should you have any questions, please contact me.

Regards,

/S / Mike Mohajer

Mike Mohajer, P.E.

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