From: Thalhamer, Todd@CalRecycle
To: Karen Gork; Ken Habaradas
Cc: Eric Morofuji; Shikari Nakagawa-Ota; Mindermann, Wes@CalRecycle; Beck, Rachel@CalRecycle
Subject: Re: CCL Soil Reaction Break Barrier Plan
Date: Thursday, April 18, 2024 11:00:46 AM

Karen,

I am recommending the soil reaction break plan be rejected due to the following:

1. The CCL plan allows the reaction to consume the 160-acre main fill area and only attempts to stop it at the southern and eastern ends by applying additional soil on the cover on the side slope along the southern and eastern fill. The application of soil will not contain the reaction if waste is connected to waste from the adjacent cell. The plan shall address the installation of an air/soil break that separates the waste with either an inert material or air.
2. The plan needs to investigate how each cell or phase was constructed. The CCL should examine if soil breaks between cells/phases can be exploited. The CCL should review where haul roads were constructed and determine if these inert roads can also be used as fuel breaks. This information should be used to develop where containment breaks should be placed.
3. The CCL should propose a set of criteria for the primary and secondary engagement lines and the type of reaction barriers and/or mitigations. These criteria shall be based on temperature, CO, and possibly settlement rate. The primary engagement line should be designed to prevent the reaction from spreading in the main fill close to the current reaction. The secondary line should prevent the reaction from entering the eastern and southern fill areas at the toe of the slope.
4. The CCL should plan on constructing reaction breaks in the main 160-acre fill area for the reaction of the engagement lines. The break plans should include a timeline and method of construction. The timelines should match the engagement lines.
5. The CCL should plan on constructing reaction breaks between Canyon C, A, D, and Cell 5 should the reaction reach the secondary engagement lines.
6. The CCL should use best available technology, such as grout injection, to slow or contain reaction movement to the south and east.
7. The CCL should also describe the criteria that will mandate the temporary suspension of placing new waste.

Todd

From: Karen Gork <KGork@ph.lacounty.gov>
Sent: Wednesday, April 17, 2024 2:13 PM
To: Ken Habaradas <khabaradas@ph.lacounty.gov>; Thalhamer, Todd@CalRecycle <Todd.Thalhamer@CalRecycle.ca.gov>
Cc: Eric Morofuji <emorofuji@ph.lacounty.gov>; Shikari Nakagawa-Ota <sota@ph.lacounty.gov>; Mindermann, Wes@CalRecycle <Wes.Mindermann@CalRecycle.ca.gov>; Beck, Rachel@CalRecycle <Rachel.Beck@calrecycle.ca.gov>
Subject: RE: CCL Soil Reaction Break Barrier Plan

Todd are you available now?
If it's okay with Ken/Shikari, we can discuss your response/ recommendation today and I can reach out to Steve to set up a meeting for asap. I would like to incorporate meeting notes with CCL into our rejection letter.

Thanks,

Karen

From: Ken Habaradas <khabaradas@ph.lacounty.gov>
Sent: Wednesday, April 17, 2024 1:33 PM
To: Thalhamer, Todd@CalRecycle <Todd.Thalhamer@calrecycle.ca.gov>
Cc: Karen Gork <KGork@ph.lacounty.gov>; Eric Morofuji <emorofuji@ph.lacounty.gov>; Shikari Nakagawa-Ota <sota@ph.lacounty.gov>; Mindermann, Wes@CalRecycle <Wes.Mindermann@calrecycle.ca.gov>; Beck, Rachel@CalRecycle <Rachel.Beck@calrecycle.ca.gov>
Subject: Re: CCL Soil Reaction Break Barrier Plan

Hi Karen,

The TTS training is wrapping up. Eric and I can be available for a call at 2:00.

Pls let us know.

Ken
Sent from my iPhone

> On Apr 17, 2024, at 1:22 PM, Thalhamer, Todd@CalRecycle <Todd.Thalhamer@calrecycle.ca.gov> wrote:
>
> CAUTION: External Email. Proceed Responsibly.
>
> Karen,

I have reviewed the Soil Reaction Break Barrier Plan and recommend that the LEA reject it because it does not mention an actual soil or air break adjacent to the reaction area. By default, the plan allows the reaction to consume the entire main cell, over 160 acres, and only adds dirt to the south and east slopes. Unless the CCL can demonstrate with an actual excavation or boring plan that shows it is not feasible, we cannot accept the risk of allowing 120 acres to be consumed by the reaction.

Todd

From: Karen Gork <KGork@ph.lacounty.gov>
Sent: Wednesday, April 17, 2024 9:52 AM
To: Thalhamer, Todd@CalRecycle <Todd.Thalhamer@CalRecycle.ca.gov>
Cc: Eric Morofuji <emorofuji@ph.lacounty.gov>; Ken Habaradas <khabaradas@ph.lacounty.gov>; Shikari Nakagawa-Ota <sota@ph.lacounty.gov>
Subject: RE: CCL Soil Reaction Break Barrier Plan

Hi Todd,

Ken and I were at the TTS yesterday.

I'm available today or both Ken and I are available tomorrow.

Thanks,

Karen Gork, MPH, REHS
Chief Environmental Health Specialist
Los Angeles County Department of Public Health – Environmental Health
Solid Waste Management Inspection and Enforcement Program
Local Enforcement Agency (LEA)

From: Thalhamer, Todd@CalRecycle <Todd.Thalhamer@CalRecycle.ca.gov>
Sent: Tuesday, April 16, 2024 11:44 AM
To: Karen Gork <KGork@ph.lacounty.gov>
Cc: Eric Morofuji <emorofuji@ph.lacounty.gov>; Ken Habaradas <khabaradas@ph.lacounty.gov>; Shikari Nakagawa-Ota <sota@ph.lacounty.gov>
Subject: Re: CCL Soil Reaction Break Barrier Plan

CAUTION: External Email. Proceed Responsibly.

Hello Karen,

Based on a review of the plan, I states today at the MAC that plan was rejected by CalRecycle. I will provide comments shortly once I talk with the operator. Do you have

staff here today or are you free to talk bifore 300 pm. Todd

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From: Karen Gork <KGork@ph.lacounty.gov>
Sent: Monday, April 15, 2024 5:14:13 PM
To: Thalhamer, Todd@CalRecycle <Todd.Thalhamer@CalRecycle.ca.gov>
Cc: Eric Morofuji <emorofuji@ph.lacounty.gov>; Ken Habaradas <khabaradas@ph.lacounty.gov>; Shikari Nakagawa-Ota <sota@ph.lacounty.gov>
Subject: FW: CCL Soil Reaction Break Barrier Plan

Caution: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Todd,

Please provide your technical review of the attached Soil Reaction Break Barrier Plan.

Thank you,

Karen Gork, MPH, REHS
Chief Environmental Health Specialist
Los Angeles County Department of Public Health – Environmental Health
Solid Waste Management Inspection and Enforcement Program
Local Enforcement Agency (LEA)

From: Ken Habaradas <khabaradas@ph.lacounty.gov>
Sent: Wednesday, April 10, 2024 12:06 PM
To: Karen Gork <KGork@ph.lacounty.gov>
Cc: Eric Morofuji <emorofuji@ph.lacounty.gov>; 'Todd. Thalhamer@CalRecycle. ca. gov' (Todd.Thalhamer@CalRecycle.ca.gov) <Todd.Thalhamer@CalRecycle.ca.gov>; Shikari Nakagawa-Ota <sota@ph.lacounty.gov>
Subject: CCL Soil Reaction Break Barrier Plan

Hi Karen,

Attached is a copy of the Soil Reaction Break Barrier Plan submitted by CCL as part of the Master Work Plan submitted to the US EPA under the UAO.

-Ken