California Environmental Protection Agency

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California Governor

Department of
Resources Recycling and Recovery

Yana Garcia
Secretary for Environmental Protection
Zoe Heller
CalRecycle Director

January 23, 2026 Via Email: Peter.Ruttan@dtsc.ca.gov

Pete Ruttan
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Subject: Additional Comments on the Draft Removal Action Workplan: Extension of Covered Area, Chiquita Canyon Landfill

Dear Mr. Ruttan:

The California Department of Resources Recycling and Recovery (CalRecycle) Staff are providing this letter in response to your request for technical assistance reviewing the following document:

> *Draft Removal Action Workplan: Interim Relocation and Stabilization of Containerized Waste; dated May 2025; revised September 19, 2025, prepared by Civil & Environmental Consultants, Inc.*

The Removal Action Workplan (RAW) was prepared in response to the Imminent and Substantial Endangerment Determination and Order (ISE Order) issued by the California Department of Toxic Substances Control (DTSC) on April 2, 2025, regarding the Subsurface Elevated Temperature (SET) Event occurring at the Chiquita Canyon Landfill (the Landfill or Site).

The RAW specifically addresses the interim relocation of leachate Tank Farm 9 from the top of the Landfill to a location that overlies Cell 8B, which is a cell that was constructed in 2024 for waste disposal, but was not approved for waste disposal. The Landfill constructed a soil pad of varying thickness up to 40 feet deep and installed liners and berms to accommodate the temporary leachate storage and treatment system (now identified as Tank Farm 13).

CalRecycle staff does have concerns regarding the temporary placement and operation of a hazardous waste storage and treatment facility on the Landfill. CalRecycle staff provides the following comments for your consideration:

1. Tank Farm 13 has been placed on a soil pad that partially overlays waste at the toe of the main southern slope. CalRecycle does not recommend allowing the permanent operation of a hazardous waste storage and treatment facility on top of waste when the SET Event is occurring within the underlying and adjacent waste management unit.

2. Because previous efforts by the Landfill to contain or control the reaction have been unsuccessful, the hazardous waste storage and treatment facility should be relocated to a permanent site that is off-site and away from the waste management unit experiencing the active SET Event.

If you have any questions or comments, please contact Todd Thalhamer at (916) 341-6356 or via email at Todd.Thalhamer@CalRecycle.ca.gov.

Sincerely,



Todd Thalhamer, P.E.
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