

# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 9 75 HAWTHORNE STREET SAN FRANCISCO, CALIFRONIA 94105

ENFORCEMENT AND COMPLIANCE ASSURANCE DIVISION

**DATE:** January 30, 2024

**SUBJECT:** CLEAN AIR ACT INSPECTION REPORT

Waste Connections Chiquita Canyon Landfill, Castaic, CA

**FROM:** Scott Connolly, Environmental Engineer

Air Section, Air, Waste & Chemicals Branch,

Enforcement and Compliance Assurance Division

**THRU:** Roshni Brahmbhatt, Manager

Air Section, Air, Waste & Chemicals Branch,

**Enforcement and Compliance Assurance Division** 

TO: File

#### **BASIC INFORMATION**

Facility Name: Waste Connections Chiquita Canyon Landfill

Facility Location: 29201 Henry Mayo Dr, Castaic, CA

Dates of Inspection: November 2, 2023, November 8, 2023, January 9, 2024, and January 18,

2024

#### **EPA Inspectors:**

#### Day 1: November 2, 2023

1. Scott Connolly, Environmental Engineer

2. Gem Guzman, Air Enforcement Inspector

#### Day 2: November 8, 2023

- 1. Scott Connolly, Environmental Engineer
- 2. Gem Guzman, Air Enforcement Inspector
- 3. Andrew Chew, Environmental Engineer

#### Day 3: January 9, 2024

- 1. Scott Connolly, Environmental Engineer
- 2. Gem Guzman, Air Enforcement Inspector
- 3. Daniel Heins, Environmental Scientist
- 4. Steve Rapp, Environmental Engineer

#### Day 4: January 18, 2024

- 1. Scott Connolly, Environmental Engineer
- 2. Thanne Berg, Attorney Advisor
- 3. Allison Watanabe, Senior Policy Advisor

#### Other Attendees

#### Day 1: November 2, 2023

- 1. Steve Cassulo, District Manager, Waste Connections
- 2. Nicole Ward, Assistant District Manager, Waste Connections
- John Perkey, Vice President, Deputy General Counsel- Compliance and Government Affairs, Waste Connections
- 4. Zana Zmily, Senior Environmental Scientist, California Department of Toxic Substances Control (DTSC)
- 5. Terrence Mann, Deputy Executive Officer, South Coast Air Quality Management District (South Coast AQMD)
- 6. Laurence Israel, Supervising Air Quality Inspector, South Coast AQMD
- 7. Christina Ojeda, Air Quality Inspector, South Coast AQMD
- 8. Gerardo Vergara, Air Quality Inspector, South Coast AQMD
- 9. Todd Thalhamer, Senior Waste Management Engineer, CalRecycle
- 10. Karen Gork, LA County Local Enforcement Agency
- 11. Douglass Cross, Los Angeles Regional Water Quality Control Board

#### Day 2: November 8, 2023

- 1. Nicole Ward, Assistant District Manager, Waste Connections
- 2. Steve Cassulo, District Manager, Waste Connections
- 3. Laurence Israel, Supervising Air Quality Inspector, South Coast AQMD
- 4. Christina Ojeda, Air Quality Inspector, South Coast AQMD
- 5. Gerardo Vergara, Air Quality Inspector, South Coast AQMD

#### Day 3: January 9, 2024

- 1. Nicole Ward, Assistant District Manager, Waste Connections
- 2. Amanda Froman, Compliance Manager, Western Region, Waste Connections
- 3. Cage Johnson, Lead Technician, SCS Engineers

#### Day 4: January 18, 2024

1. Terrence Mann, Deputy Executive Officer, South Coast AQMD

- 2. Christina Ojeda, Air Quality Inspector, South Coast AQMD
- 3. Nicole Ward, Assistant District Manager, Waste Connections
- 4. Amanda Froman, Compliance Manager Western Region, Waste Connections
- 5. John Perkey, Vice President, Deputy General Counsel Compliance and Government Affairs, Waste Connections
- 6. Steve Cassulo, District Manager, Waste Connections
- 7. Mike Calleja, Director of Landfill Operations, Waste Connections
- Kurt Shaner, Vice President Engineering and Sustainability, Waste Connections
- 9. Dave Matthews, Operations Specialist, Waste Connections

**Contact Email Address:** nicole.ward@wasteconnections.com

**Purpose of Inspection:** To observe the landfill reaction causing odor complaints and determine compliance with the Clean Air Act.

Facility Type: Municipal Solid Waste Landfill

**Regulations Central to Inspection:** 40 C.F.R. Part 63 Subpart AAAA National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills, 40 C.F.R. Part 60 New Source Performance Standards Subparts WWW and XXX and the federally enforceable State Plan Implemented under 40 C.F.R. Part 60, Subpart Cf, the Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills

# Day 1: November 02, 2023 Arrival Time: 10:00 AM Departure Time: 01:30 PM

Day 2: November 08, 2023
Arrival Time: 08:30 AM
Departure Time: 02:00 PM

Day 3: January 9, 2024
Arrival Time: 08:30 AM
Departure Time: 04:00 PM

Day 4: January 18, 2024
Arrival Time: 10:30 AM
Departure Time: 1:45 PM

#### **Inspection Type:**

Announced Inspections – November 2, 2023, January 18, 2024

☐ Unannounced Inspections – November 8, 2023, January 9, 2024

#### **OPENING CONFERENCE**

- ☐ Confidential Business Information (CBI) notice to facility provided

The following information was obtained verbally from Waste Connection Inspection attendees unless otherwise noted.

#### **Facility and Process Description:**

Chiquita Canyon Landfill (CCL) operates a municipal solid waste landfill that services Los Angeles County and has a 60 million tons permitted capacity. Waste Connections took over operations of the landfill from Republic Services, Inc. in 2009. CCL operates a gas collection system that consists of approximately 500 wells. Collected gas is treated by four hydrogen sulfide units and two main flares, and a third flare was being installed and tested during the time of the inspection. The facility is also operating two temporary thermal oxidizers on the landfill surface to control vapors from the reaction area. The new thermal oxidizers include one 4700 scfm unit located on the top of the landfill and one 1200 scfm unit on the north side of the landfill.

The tank farm was installed between Day 1 and Day 4 of the inspection and currently consists of 50 tanks, that are gravity fed leachate from 36 pneumatic pumps, both in wells and sumps. The tank farm currently only receives leachate from pumps installed at the landfill since the beginning of the reaction and has increased from 10 pumps in August 2023. The tank farm supplements the six original tanks that collected leachate prior to the reaction event. The tank farm has two inlet tanks that receives leachate from the landfill and gravity settles sediment before pumping leachate to tanks in groups of 10 tanks. Each tank has a rated capacity of 20,000 gallons and the tank farm has a total capacity of one million gallons. All tanks are connected to the gas collection system and routes collected landfill gases to the existing flares.

#### Staff Interview:

CCL is experiencing a subsurface reaction event caused by oxygen intrusion beneath the landfill cover. Facility staff stated that the reaction is causing elevated subsurface temperatures and increased leachate production. Waste Connections stated that normal waste settlement is six inches to one foot per year, but that during the reaction event settling greater than 1 foot per month is occurring. Landfill settling caused the western slope of the landfill to slide down over the perimeter road at the base of the landfill. Facility staff stated that 20 million pounds of material that included trash, soil and leachate, was removed from the area and relocated to the working face. The reaction event is causing the excess landfill odors in the form of excess leachate, dimethyl sulfide (DMS), and odors created from the excavation of an old fill during efforts to contain the reaction. Waste Connections stated the odor is coming from two different areas but mostly the west and north side of the landfill, where the majority of leachate is seeping out of the cover. Facility staff stated that an odor suppression system is operated 24/7, except during periods of high wind. Leachate produced onsite is being pumped into vacuum trucks and taken to Avalon and Patriot facilities in Orange County, CA. Steve Cassulo stated that

no solid materials are coming back from Avalon and Patriot after treatment. The facility has 18 to 28 5000-gallon trucks a day transporting the leachate.

On January 15<sup>th</sup>, 2024, the landfill reported smoldering and visible emissions, prompting emergency response from fire and Hazmat personnel. The location of the smoldering was an out of service carbon canister in the hydrogen sulfide treatment system. The carbon in the vessel was recently replaced and was not hooked up to the gas collection system at the time of the incident.

#### **TOUR INFORMATION**

#### EPA toured the facility: Yes

EPA conducted inspections on four separate days and EPA conducted surface emissions monitoring on Day 2 and 3. On all days of the inspection EPA was accompanied by CCL personnel and on Day 2 and 3 CCL's surface monitoring contractor SCS Engineers also accompanied EPA inspectors.

Inspection Day 1 consisted of opening remarks and a tour of the reaction area, including visual observations of newly constructed wells, French drain construction and landfill settling. DTSC conducted infrared monitoring of well surface temperatures and EPA conducted gas imaging and infrared monitoring of well heads.

Inspection Day 2 consisted of leak detection at the flare station, surface emissions monitoring of wells in the reaction area on the west side, a tour of the north side of the landfill and observations of the leachate check dams and drainage pumping area.

Inspection Day 3 consisted of surface emissions monitoring of wells and the landfill surface on the west side and south side of the top of the landfill as depicted in Figures 1 and 2 in Appendix B.

Inspection Day 4 consisted of a tour of the landfill reaction area on the north and west side of the landfill, the base of the French drain and installed scrim area, and the leachate tank farm.

The following are observations EPA made during those inspection days.

#### **Observations:**

On all days of the inspection, inspectors observed sour odors throughout the reaction area and a settlement of the landfill surface of approximate 20 to 30 feet below the previous grade. CCL has created a soil dam in the concrete drainage channel to prevent leachate from flowing offsite. Facility staff stated that the dams are a temporary fix to prevent leachate from leaving the facility while a new French drain is constructed. On Day 1 and 2 of the inspection, EPA observed leachate flowing out of the base of the landfill on the northwestern side and

contained in more than three soil dams. The first of the soil dams was overflowing. There was only a small amount of leachate past the second soil dam. On Day 4 of the inspection, no leachate was observed in the concrete drainage channel, and there were 4 soil check dams in place (Photos 152 & 153). Only on Day 2, EPA observed leachate bubbling out of the north side base of the landfill next to the perimeter road and a pool of leachate was contained by facility excavators. (Photos 83 and 84). On Day 4, EPA observed leachate seeping out of the north side of the landfill about two hundred meters from the leachate seep observed on Day 2.

On Day 1 and 2, EPA observed excavation of soil and exposed waste during the construction of the French drain. On Day 2, EPA observed a landfill well geyser at well CV-2303 as a result of high subsurface temperature and repairs occurring on the well water pump. (Photos 38 and 39 and Videos 9 and 10) On Day 3, EPA observed Well CV-2303 dripping leachate from the flange on the top of the well. On Day 3 and 4, EPA observed rain ruts creating areas of exposed trash and elevated surface emissions monitoring near well CV2353 and facility staff stated that it would not be fixed until regrading of the area on January 19, 2024. On Day 4, at the western slope of the reaction area at the perimeter of the landfill and adjacent to the road, EPA observed standing liquid above the scrim. The liquid appeared dark and small, discrete bubbling occurred sporadically. Inspectors also observed air pockets or ballooning under the scrim. (Photos 146-148 and Video 13)

**Digital Images:** were taken during the inspection. A digital image log is in Appendix A.

#### **Data Collected and Field Measurements:**

On Day 2 and Day 3 of the inspection, EPA inspectors conducted surface emission monitoring using a Toxic Vapor Analyzer (TVA) and infrared portable methane detector (IRwin). No surface emission monitoring was conducted on Day 1 and Day 4. On Day 2 and Day 3, EPA conducted surface emission monitoring on the west side of the landfill in the reaction area and, on Day 3, on the southern aspect of the peak of the landfill, between the current working face and the wet weather deck. EPA and South Coast Air Quality Management District (South Coast AQMD) inspectors conducted modified EPA Method 21 surface emission monitoring as required by the regulations central to this inspection. Waste Connections' surface emissions monitoring consultant accompanied EPA on Day 2 and 3 and confirmed EPA's surface emissions readings.

On Day 2, EPA conducted surface emissions monitoring at 30 wells and detected concentrations above 500 ppm at 13 wells. On Day 3, EPA conducted surface emissions monitoring on the west side of the landfill and on the south side of the top of the landfill and detected concentrations above 500 ppm at 50 unique locations.

After EPA detected emissions concentrations at Well G-1, CCL turned up the vacuum to attempt repair, and on Well G-3, the technician observed positive pressure after monitoring.

A log of TVA measurements and IRwin monitoring data is in located in Appendix B.

#### **CLOSING CONFERENCE**

#### **Requested documents:**

- A design plan that includes the facility's compliance with federal regulations
- Well head temperature monitoring data from 2022 and 2023
- Surface Emission Monitoring data from 2022 and 2023
- Master Schedule of Planned construction work to respond to the reaction event

**Concerns:** Surface emissions exceedances were observed both inside and outside the reaction area. Multiple areas of exposed leachate were observed, and odors were detected in multiple areas of the landfill.

<u>Signatures</u>			
Report Author:			
Section Manager:			

Facility Name: Waste Connections Chiquita Canyon Landfill

Facility Location: 29201 Henry Mayo Dr, Castaic, CA

Date of Inspection: November 2, 2023, November 8, 2023, January 9, 2024, and January 18,

2024

## **APPENDICES AND ATTACHMENTS**

1. Appendix A – Digital Image Log

2. Appendix B – Field Measurement Data

Date of Inspection: November 2, 2023, November 8, 2023, January 9, 2024, and January 18, 2024

# **APPENDIX A: DIGITAL IMAGE LOG**

1. Photographer Name:	2. Dates of Inspection:
Gem Guzman (#1-90)	November 2, 2023, November 8, 2023, January 9,
Daniel Heins (#91-121)	2024, and January 18, 2024
Scott Connolly (#122-153)	
3. Company/Facility Name:	4. Street Address, City, State:
Waste Connections Chiquita Canyon	29201 Henry Mayo Dr, Castaic, CA
Landfill	
5. Number of Images:	6. Archival Record Location:
90	EPA SharePoint

#### **Digital Camera Log**

Digital Car	nera Log			
_	File Name	Date	Latitude and	Description of Image
Number			Longitude	
1	PB030092.JPG	2023:11:02 10:11:31	No Data Available	Main canyon landfill top bridge
2	PB030093.JPG	2023:11:02 10:11:34	No Data Available	Main canyon landfill top bridge
3	PB030094.JPG	2023:11:02 10:19:41	No Data Available	Main canyon landfill top bridge
4	PB030095.JPG	2023:11:02 10:19:47	No Data Available	Main canyon landfill top bridge
5	PB030096.JPG	2023:11:02 10:24:59	No Data Available	Main canyon landfill top bridge
6	PB030097.JPG	2023:11:02 10:25:12	No Data Available	Main canyon landfill top bridge
7	PB030098.JPG	2023:11:02 10:25:15	No Data Available	Main canyon landfill top bridge
8	PB030099.JPG	2023:11:02 10:33:15	No Data Available	Solar panel on main canyon landfill top
				bridge
9	PB030100.JPG	2023:11:02 10:33:22	No Data Available	Well and hoses near reaction area
10	PB030101.JPG	2023:11:02 10:37:38	No Data Available	Main canyon landfill top bridge
11	PB030102.JPG	2023:11:02 10:37:44	No Data Available	Main canyon landfill top bridge
12	PB030103.JPG	2023:11:02 10:42:22	No Data Available	Main canyon landfill top bridge
13	PB030104.JPG	2023:11:02 10:53:53	No Data Available	Leaking well
14	PB030105.JPG	2023:11:02 11:15:12	No Data Available	Seeping leachate channel
15	PB030106.JPG	2023:11:02 11:15:14	No Data Available	Seeping leachate channel
16	PB030107.JPG	2023:11:02 11:15:17	No Data Available	Seeping leachate channel
17	PB030108.JPG	2023:11:02 11:16:50	No Data Available	Seeping leachate channel
18	PB030109.JPG	2023:11:02 11:16:55	No Data Available	Seeping leachate channel
19	PB030110.JPG	2023:11:02 11:17:21	No Data Available	Seeping leachate channel
20	PB030111.JPG	2023:11:02 11:19:30	No Data Available	Seeping leachate channel
21	PB030112.JPG	2023:11:02 11:19:32	No Data Available	Seeping leachate channel
22	PB030113.JPG	2023:11:02 11:20:54	No Data Available	Seeping leachate channel
23	PB030114.JPG	2023:11:02 11:20:58	No Data Available	Seeping leachate channel
24	PB030115.JPG	2023:11:02 11:21:00	No Data Available	Seeping leachate channel
25	PB030116.JPG	2023:11:02 11:31:55	No Data Available	Foamy Well

		1	T	1
26	PB090119.JPG	2023:11:08 09:35:31		Flare station control panel screen
27	PB090120.JPG	2023:11:08 09:35:35	No Data Available	Flare station control panel screen
28	PB090121.JPG	2023:11:08 09:35:51	No Data Available	Flare station control panel screen
29	PB090122.JPG	2023:11:08 09:35:53	No Data Available	Flare station control panel screen
30	PB090123.JPG	2023:11:08 09:48:56	No Data Available	Flare station side 1
31	PB090124.JPG	2023:11:08 09:49:09	No Data Available	Flare station side 2
32	PB090125.JPG	2023:11:08 10:01:45	No Data Available	Well #CV-2303
33	PB090126.JPG	2023:11:08 10:01:50	No Data Available	Well #CV-2303
34	PB090127.JPG	2023:11:08 10:03:53	No Data Available	Well #CV-2303 (point of highest reading)
35	PB090128.JPG	2023:11:08 10:07:48	No Data Available	Well #H-1769-A
36	PB090129.JPG	2023:11:08 10:08:03	No Data Available	Well #H-17
37	PB090130.JPG	2023:11:08 10:08:04	No Data Available	Well #H-17
38	PB090131.JPG	2023:11:08 10:10:02	No Data Available	Steaming geyser
39	PB090132.JPG	2023:11:08 10:10:05		Steaming geyser
40	PB090133.JPG	2023:11:08 10:42	No Data Available	Well #H-1964C
41	PB090134.JPG	2023:11:08 10:17:50	No Data Available	Well #TC-2385N
42	PB090135.JPG	2023:11:08 10:20:38	No Data Available	Well #H-1754N
43	PB090136.JPG	2023:11:08 10:22:14	No Data Available	Well #H-67
44	PB090137.JPG	2023:11:08 10:25:06	No Data Available	Duct tape covered pipe
45	PB090138.JPG	2023:11:08 10:25:25	No Data Available	Duct tape covered pipe
46	PB090139.JPG	2023:11:08 10:25:28	No Data Available	Duct tape covered pipe
47	PB090140.JPG	2023:11:08 10:26:58	No Data Available	Well #CV-2304
48	PB090141.JPG	2023:11:08 10:30:21	No Data Available	Well #CV-2302
49	PB090142.JPG	2023:11:08 10:30:26	No Data Available	Well #CV-2302
50	PB090143.JPG	2023:11:08 10:31:41	No Data Available	Well #CV-100
51	PB090144.JPG	2023:11:08 10:31:46	No Data Available	Well #CV-100
52	PB090145.JPG	2023:11:08 10:33:54	No Data Available	Well #H-1753S
53	PB090146.JPG	2023:11:08 10:34:03	No Data Available	Well #H-1753S
54	PB090147.JPG	2023:11:08 10:37:51	No Data Available	Well #H-1758N
55	PB090148.JPG	2023:11:08 10:40:48	No Data Available	Well #H-1563N
56	PB090149.JPG	2023:11:08 10:44:19	No Data Available	Well #H-1562S
57	PB090150.JPG	2023:11:08 10:45:12	No Data Available	Well #2341, With total depth (TD) of 92 ft and water level (L) of 65 ft
58	PB090151.JPG	2023:11:08 10:48:33	No Data Available	Well #H-1757N
59	PB090152.JPG	2023:11:08 10:50:02	No Data Available	Well #2340, TD-52' L-31'
60	PB090153.JPG	2023:11:08 10:53:19	No Data Available	Well #2339
61	PB090154.JPG	2023:11:08 10:56:56	No Data Available	Well #H-1562N
62	PB090155.JPG	2023:11:08 10:58:49	No Data Available	Well #H-1756N
63	PB090156.JPG	2023:11:08 10:59:37	No Data Available	Well #CV-1532A
L	1	1	ı	I

64	PB090157.JPG	2023:11:08 11:03:29	No Data Available	Well #CV-1532
65	PB090158.JPG	2023:11:08 11:06:18	No Data Available	Well #H-1751S
66	PB090159.JPG	2023:11:08 11:07:02	No Data Available	Well #CV-1534A
67	PB090160.JPG	2023:11:08 11:10:54	No Data Available	Well #H-1561C
68	PB090161.JPG	2023:11:08 11:13:44	No Data Available	Well #CV-1534
69	PB090162.JPG	2023:11:08 11:13:51	No Data Available	Well #CV-1534
70	PB090163.JPG	2023:11:08 11:14:05	No Data Available	Well #H-1755N
71	PB090164.JPG	2023:11:08 11:17:07	No Data Available	Well #CV-2354
72	PB090165.JPG	2023:11:08 11:21:28	No Data Available	Well #TC-2382W
73	PB090166.JPG	2023:11:08 11:24:39	No Data Available	Leachate
74	PB090167.JPG	2023:11:08 11:24:46	No Data Available	Leachate
75	PB090168.JPG	2023:11:08 11:26:50	No Data Available	Steaming by leachate
76	PB090169.JPG	2023:11:08 11:26:58	No Data Available	Steaming by leachate
77	PB090170.JPG	2023:11:08 11:27:01	No Data Available	Steaming by leachate
78	PB090172.JPG	2023:11:08 11:31:35	No Data Available	Well #CV-2351, TD-39' L-7'
79	PB090173.JPG	2023:11:08 11:34:34	No Data Available	Well #CV-2352, TD-45' L-10' with hose
79				out
80	PB090174.JPG	2023:11:08 11:37:06	No Data Available	Well #CV-2353
81	PB090175.JPG	2023:11:08 11:39:42	No Data Available	Well #CV-2342A
82	PB090176.JPG	2023:11:08 11:54:20	No Data Available	Bubbling leachate
83	PB090177.JPG	2023:11:08 11:54:31	No Data Available	Bubbling leachate
84	PB090179.JPG	2023:11:08 11:54:47	No Data Available	Bubbling leachate area
85	PB090180.JPG	2023:11:08 11:57:01	No Data Available	Seeping leachate channel
86	PB090181.JPG	2023:11:08 12:15:42	No Data Available	Leachate dam
87	PB090182.JPG	2023:11:08 12:19:10	No Data Available	Leachate dam
88	PB090183.JPG	2023:11:08 12:21:37	No Data Available	Trucks transporting leachate
89	P1090008.JPG	2024:01:09 10:20:35	34.434418,	Erosion, exposed waste
03			-118.649593	
90	P1090009.JPG	2024:01:09 10:38:32	34.433873,	Deep erosion (Measurement Number
30			-118.649995	A4)
91	P1090010.JPG	2024:01:09 10:40:40	34.433795,	Exposed waste - tire (Measurement
			-118.650407	Number A5)
92	P1090011.JPG	2024:01:09 10:40:45	34.433795,	Erosion rill (Measurement Number A5)
			-118.650407	
93	P1090012.JPG	2024:01:09 10:49:07	34.434587,	Erosion (Measurement Number A11)
			-118.650988	
94	P1090013.JPG	2024:01:09 10:49:14	34.434587,	Erosion (Measurement Number A11)
	D4.00004.4 JBC	2024-04-00-40-54-44	-118.650988	Function with a supposed to the
95	P1090014.JPG	2024:01:09 10:54:11	34.434268,	Erosion with exposed waste
			-118.650613	(Measurement Number A7)

118					
P1090016.JPG   2024:01:09 11:01:02   34.43442,   Erosion	06	P1090015.JPG	2024:01:09 11:00:58	34.434442,	Erosion
97	90			-118.65077	
118.65077	07	P1090016.JPG	2024:01:09 11:01:02	34.434442,	Erosion
118.651675   Measurement Number D3	37			-118.65077	
P1090018.JPG   2024:01:09 11:22:24   34.43471,   Well #CV24143 (Measurement Number D3)   100   P1090020.JPG   2024:01:09 11:22:24   34.43471,   Hell #CV24143 (Measurement Number D3)   118.651238   D4)   D40025.JPG   D40025.JPG   D40025.JPG   D40025.JPG   D40025.JPG   D40025.JP	00	P1090017.JPG	2024:01:09 11:15:26	34.435702,	Depression above CV2351
100	96			-118.651675	(Measurement Number D3)
100	00	P1090018.JPG	2024:01:09 11:22:21	34.43471,	Well #CV24143 (Measurement Number
101   P1090020.JPG   2024:01:09 11:22:28   34.43471,   118.651238   D4	33			-118.651238	D4)
118.651238   D4    D4	100	P1090019.JPG	2024:01:09 11:22:24	34.43471,	Well #CV24143 (Measurement Number
101	100			-118.651238	D4)
118.651238   D4	101	P1090020.JPG	2024:01:09 11:22:28	34.43471,	Well #CV24143 (Measurement Number
102	101			-118.651238	D4)
118.651037	102	P1090021.JPG	2024:01:09 11:25:37	34.434717,	Discolored soil at base of well CV24140
103	102			-118.651037	(Measurement Number D5)
104   P1090023.JPG   2024:01:09 13:49:53   34.432382,	103	P1090022.JPG	2024:01:09 11:25:42	34.434717,	Well label for above CV24140
104	103			-118.651037	
118.646658   S1	104	P1090023.JPG	2024:01:09 13:49:53	,	Well #H-1568S (Measurement Number
105	104			-118.646658	S1)
106   P1090025.JPG   2024:01:09 14:03:39   34.432212,	105	P1090024.JPG	2024:01:09 13:54:50	34.43221,	Erosion rills with exposed waste
106	103			-118.646967	
118.64641   Number S2	106	P1090025.JPG	2024:01:09 14:03:39	34.432212,	Exposed waste - carpet (Measurement
108   P1090027.JPG   2024:01:09 14:15:39   34.43191,   Erosion and waste under pipe (Measurement Number S4)     109   P1090028.JPG   2024:01:09 14:27:57   No Data Available   Well #H-1571S (Measurement Number S6)     110   P1090029.JPG   2024:01:09 14:30:13   34.432157,   Well CV1604 with nearby exposed waste (Measurement Number S7)     111   P1090030.JPG   2024:01:09 14:34:09   34.432208,   H18.644782   S8)     112   P1090031.JPG   2024:01:09 14:50:48   34.431302,   Abandoned wells CV1602S (Measurement Number S9)     113   P1090032.JPG   2024:01:09 14:56:55   34.431287,   Pipe w/ gully (Measurement Number S9)     114   P1090033.JPG   2024:01:09 15:08:55   34.431927,   Deep erosion gully with exposed waste in and around (Measurement Number S11)     115   P1090034.JPG   2024:01:09 15:12:23   34.43217,   Pipe sunk into ground with exposed waste in and around waste (Measurement Number S11)     115   P1090034.JPG   2024:01:09 15:12:23   34.43217,   Pipe sunk into ground with exposed waste in and around (Measurement Number S11)     115   P1090034.JPG   2024:01:09 15:12:23   34.43217,   Pipe sunk into ground with exposed waste in and around (Measurement Number S11)	100			-118.64641	Number S2)
108   P1090027.JPG   2024:01:09 14:15:39   34.43191,   Erosion and waste under pipe (Measurement Number S4)     109	107	P1090026.JPG	2024:01:09 14:09:59	34.43204,	Erosion rill (Measurement Number S3)
108	107			-118.646167	
P1090028.JPG   2024:01:09 14:27:57   No Data Available   Well #H-1571S (Measurement Number S6)	108	P1090027.JPG	2024:01:09 14:15:39	•	
109				-118.646482	
P1090029.JPG	109	P1090028.JPG	2024:01:09 14:27:57	No Data Available	·
110	103				,
P1090030.JPG	110	P1090029.JPG	2024:01:09 14:30:13	,	
111	110			-118.64506	
P1090031.JPG 2024:01:09 14:50:48 34.431302, Abandoned wells CV1602S (Measurement Number S9)  P1090032.JPG 2024:01:09 14:56:55 34.431287, Pipe w/ gully (Measurement Number S10)  P1090033.JPG 2024:01:09 15:08:55 34.431927, Deep erosion gully with exposed waste in and around (Measurement Number S11)  P1090034.JPG 2024:01:09 15:12:23 34.43217, Pipe sunk into ground with exposed waste, by CV2348 (Measurement Number S11)	111	P1090030.JPG	2024:01:09 14:34:09	,	•
112   118.647638   (Measurement Number S9)  113   P1090032.JPG   2024:01:09 14:56:55   34.431287,				-118.644782	•
118.647638 (Measurement Number S9)  119 P1090032.JPG 2024:01:09 14:56:55 34.431287, Pipe w/ gully (Measurement Number S10)  P1090033.JPG 2024:01:09 15:08:55 34.431927, Deep erosion gully with exposed waste in and around (Measurement Number S11)  P1090034.JPG 2024:01:09 15:12:23 34.43217, Pipe sunk into ground with exposed waste -118.649572 waste, by CV2348 (Measurement Number S12)	112	P1090031.JPG	2024:01:09 14:50:48	,	
113	-14				
P1090033.JPG 2024:01:09 15:08:55 34.431927, Deep erosion gully with exposed waste in and around (Measurement Number S11)  P1090034.JPG 2024:01:09 15:12:23 34.43217, Pipe sunk into ground with exposed waste, by CV2348 (Measurement	113	P1090032.JPG	2024:01:09 14:56:55	,	. , , , ,
114       -118.649208       in and around (Measurement Number S11)         P1090034.JPG       2024:01:09 15:12:23       34.43217, Pipe sunk into ground with exposed waste, by CV2348 (Measurement	113			-118.647648	•
P1090034.JPG		P1090033.JPG	2024:01:09 15:08:55	,	Deep erosion gully with exposed waste
P1090034.JPG 2024:01:09 15:12:23 34.43217, Pipe sunk into ground with exposed waste, by CV2348 (Measurement	114			-118.649208	-
-118.649572 waste, by CV2348 (Measurement					·
		P1090034.JPG	2024:01:09 15:12:23	1	
Number S12)	115			-118.649572	
					Number S12)

116	P1090035.JPG	2024:01:09 15:19:45	No data available	Well 2345 (Measurement Number S13
117	P1090036.JPG	2024:01:09 15:26:01	34.433142,	Erosion gully (Measurement Number
117			-118.65017	S14)
110	P1090037.JPG	2024:01:09 15:27:57	34.433163,	Well #H-17705 (Measurement Number
118			-118.650172	S15)
119	P1090038.JPG	2024:01:09 15:54:32	No data available	AED IRwin serial number
120	IMG_0847.jpg	1/11/2024 10:01	34.43553, -	Well CV-2303, location of excess
120			118.64967	emissions
121	IMG_0848.jpg	1/11/2024 10:01	34.43565, -	Well CV-2303, location of excess
121			118.64963	emissions
122	IMG_0849.jpg	1/11/2024 10:07	34.43500, -	Well CV-2203 dripping leachate
122			118.64928	
123	IMG_0850.jpg	1/11/2024 10:08	34.43502, -	Well CV-2203 dripping leachate
123			118.64928	
	IMG_0851.jpg	1/11/2024 10:28	34.43410, -	Pipes used to support temporary
124			118.65011	header line, that remained after
				header was moved
125	IMG_0852.jpg	1/11/2024 11:01	34.43444, -	Header between CV-2353 and CV-
123			118.65082	2342A with reading above 500 ppm
126	IMG_0853.jpg	1/11/2024 11:08	34.444517, -	Area near well CV-2352 (monitoring
120			118.65808	location A-9)
127	IMG_0854.jpg	1/11/2024 11:18	34.43518, -	New French drain after tarp covering
127			118.65128	and gas collection installed
128	IMG_0855.jpg	1/11/2024 11:34	34.443454, -	Area near Well CV-24142 with leak at
120			118.65118	1200 ppm
129	IMG_0856.jpg	1/11/2024 11:41	34.44470, -	Area near Well CV-24142 with leak at
129			118.65778	1400 ppm
130	IMG_0857.jpg	1/11/2024 13:58	34.443260, -	Area gas leak at 1400 ppm near well
130			118.64666	H2274B (monitoring location G-1)
131	IMG_0858.jpg	1/11/2024 14:06	34.43235, -	Well H-2275E leaking at 4500 ppm
131			118.64621	
122	IMG_0859.jpg	1/11/2024 14:14	34.43238, -	Area between wells H-2275E and H-
132			118.64610	1763E at 800 ppm
122	IMG_0860.jpg	1/11/2024 14:51	34.43140, -	Well H-1408 leaking at 3094 ppm at
133			118.64750	the base of the well
124	IMG_0861.jpg	1/11/2024 14:58	34.43162, -	Well H-2272C leaking at 2500 ppm (SC
134			118.64762	3)
125	IMG_0862.jpg	1/11/2024 15:09	34.43224, -	Well H-2274B leaking at 1100 ppm
135			118.64879	
	IMG_0863.jpg	1/11/2024 15:20	34.43270, -	Rut with exposed trash between well
136			118.64972	H-17575 and H-14850 with above 500
				ppm

	IMG_0904.jpg	1/18/2024 10:42	34.44484, -	Well drilling rig on the northside of the	
137			118.65785	landfill near temporary thermal oxidizer	
138	IMG_0905.jpg	1/18/2024 10:43	34.43543, -	Two other drilling rigs on the top of the	
156			118.64981	landfill	
139	IMG_0906.jpg	1/18/2024 10:57	34.43495, -	Well CV2303 well after repairs to	
133			118.64931	gasket seal and leachate on ground	
	IMG_0907.jpg	1/18/2024 11:04	34.43504, -	Rain ruts on west side of landfill near	
140			118.64998	well CV 2338 where exceedances were	
				found on Day 3.	
	IMG_0908.jpg	1/18/2024 11:04	34.43494, -	Rain ruts on west side of landfill near	
141			118.65005	well CV 2338 where exceedances were	
				found on Day 3.	
142	IMG_0909.jpg	1/18/2024 11:17	34.43712, -	Leachate seep on the northside of the	
			118.64823	landfill	
143	IMG_0910.jpg	1/18/2024 11:17	34.43701, -	Leachate seep on the northside of the	
			118.64826	landfill	
144	IMG_0911.jpg	1/18/2024 11:29	34.43689, -	Newly drilled well and uncapped pipe	
			118.64819		
145	IMG_0912.jpg	1/18/2024 11:29	34.43682, -	Well CV2424	
			118.64816		
146	IMG_0913.jpg	1/18/2024 11:43	34.43305, -	Water on top of scrim tarp and gas	
			118.65199	pillows	
147	IMG_0914.jpg	1/18/2024 11:46	34.43305, -	Water on top of scrim tarp and gas	
			118.65199	pillows	
148	IMG_0915.jpg	1/18/2024 11:47	34.43305, -	Water on top of scrim tarp and gas	
			118.65199	pillows	
149	IMG_0917.jpg	1/18/2024 12:17	34.42954 -	Some of the tank farm tanks	
			118.64848		
150	IMG_0918.jpg	1/18/2024 13:03	34.44484, -	Atomos leachate treatment system	
			118.65785		
151	IMG_0919.jpg	1/18/2024 13:10	34.42782, -	Gas collection system on tank farm	
			118.64973		
152	IMG_0920.jpg	1/18/2024 13:25	34.42941, -	Check soil check dams on west side of	
			118.65140	landfill after leachate removed	
153	IMG_0921.jpg	1/18/2024 13:25	34.42941, -	Check soil check dams on west side of	
			118.65140	landfill after leachate removed	

Date of Inspection: November 2, 2023, November 8, 2023, January 9, 2024, and January 18, 2024

Video Log

			Latitude and	
	File Name	Date and Time	Longitude	Description of Image
1				FLIR Camera of emissions from hole
	MOV_0435.mp			in the ground near the top of where
	4		No Data	the scrim was placed and Well C-
		11/2/2023 13:19	Available	23823
2	MOV 0436.mp			FLIR camera video of emission at well
	4		No Data	foam sprayed will with obscured
	4	11/2/2023 13:34	Available	identifiers.
3	MOV_0439.mp		No Data	
	4	11/8/2023 10:54	Available	Error Video
4	MOV_0430.mp		No Data	
	4	11/8/2023 11:04	Available	Well CV 1523A FLIR Video
5	MOV_0441.mp		No Data	
	4	11/8/2023 11:08	Available	Well CV-1534A FLIR Video
6	PB090171.MOV		No Data	
	1 0030171.1010	11/8/2023 11:28	Available	Steaming by leachate
7	PB090178.MOV		No Data	
	1 0030170.1010	11/8/2023 11:54	Available	Bubbling leachate
8		11/28/2023 11:28	34.43450, -	Vapors being emitting to the
	IMG_825.mov		118.65120	atmosphere from the side of tarp on
				the west side of the landfill
9	IMG_1164.mov	11/28/2023 10:09	34.43450, -	Geyser-ing well # near the start of
	1110_110101		118.64940	the geyser event
10	IMG 1172.mov	11/28/2023 10:12	34.43520, -	Geyser-ing well # during the end of
			118.64910	the geyser event
11	IMG_1184.mov	11/28/2023 12:17	34.43060, -	Leachate drainage creek in upstream
			118.65080	of the soil dams
12		11/28/2023 11:20	34.43450, -	Vapors being emitting to the
	IMG_1209.mov		118.65120	atmosphere from the side of tarp on
				the west side of the landfill
13		1/18/2024	34.43300, -	Landfill gas bubbling in leachate
	IMG_0916.mov		118.65200	pond on top of the scrim tarp on top
				of the French drain on the west side
				of the landfill

## **APPENDIX B: FIELD MEASUREMENT DATA**

EPA and South Coast AQMD inspectors conducted EPA Method 21 monitoring on Day 2 and Day 3 of the inspection.

Date of Inspection: November 2, 2023, November 8, 2023, January 9, 2024, and January 18, 2024

On November 8, 2023, EPA and South Coast AQMD inspectors calibrated the TVA prior to arrival at the facility using a demand regulator and methane calibration gases at 0 ppm, 500 ppm, and 1% (10,000 ppm). The following tables summarizes the Day 2 calibrations:

Day 2: TVA Calibration Log			
Calibration Gas	TVA S72389 Reading		
Zero Air	0.0 ppm		
500 ppm	489 ppm		
10,000 ppm	1.00 %		

On Day 2, EPA inspectors operated an EPA owned FLIR to document emission from leaking components and emissions from components that were not able to be measured.

On January 9, 2024, EPA inspectors calibrated the methane monitoring equipment, including the TVA 2020, EPA serial number S72389 and EPA serial number S72354, and two IRwin devices numbers 438 (AED) and 439 (R9), at 8:45 am using a demand regulator and methane calibration gases at 0 ppm, 500 ppm, and 1% (10,000 ppm). The following tables summarizes the Day 3 calibrations:

Day 3: TVA Calibration Log				
Calibration Gas	TVA S72389	TVA \$72354		
Zero Air	-2.5 ppm	1.7 ppm		
500 ppm	490 ppm	513 ppm		
10,000 ppm	1.00 %	1.03%		

Day 3: IRwin Calibration Log					
	AED IRwin		R9 IRwin		
Calibration Gas	IRwin Reading	Response time	IRwin Reading	Response time	
Concentration					
500 ppm	495 ppm	6 seconds	494 ppm	7 seconds	
500 ppm	495 ppm	7 seconds	495 ppm	5 seconds	
500 ppm	495 ppm	5 seconds	494 ppm	5 seconds	
End of day bump check	480 ppm	N/A	470 ppm	N/A	
conducted at 4:05 pm					
with 500 ppm					

• EPA measured background concentrations upwind on the east of the landfill at 0 ppm and downwind, west of the landfill at 3 ppm.

#### **TVA Field Measurement Data**

Location	Date	TVA Measurement
CV-2303	November 8, 2023	3100 ppm
H1769A H-17	November 8, 2023	672 ppm
H1964C	November 8, 2023	1216 ppm
TC-2385N	November 8, 2023	No reading above background

Date of Inspection: November 2, 2023, November 8, 2023, January 9, 2024, and January 18, 2024

H1754N	November 8, 2023	No reading above background
H-67	November 8, 2023	No reading above background
CV-2304	November 8, 2023	No reading above background
CV-2302	November 8, 2023	No reading above background
CV-100	November 8, 2023	No reading above background
H-1753S	November 8, 2023	300 ppm
H-1758N	November 8, 2023	No reading above background
H-1563N	November 8, 2023	No reading above background
H1962S TD-92' L-65'	November 8, 2023	No reading above background
W1757N	November 8, 2023	No reading above background
CV2340 TD-52' L-31'	November 8, 2023	No reading above background
CV2339	November 8, 2023	1900 ppm
H-1562N	November 8, 2023	No reading above background
H1756N	November 8, 2023	No reading above background
CV1532A	November 8, 2023	34,400 ppm
CV1532	November 8, 2023	2200 ppm
H1751S	November 8, 2023	No reading above background
CV1534A	November 8, 2023	9600 ppm
H1561C	November 8, 2023	No reading above background
CV1534	November 8, 2023	812 ppm
H1755N	November 8, 2023	No reading above background
CV2354 TD-50' L-7'	November 8, 2023	1136 ppm
TC-2382W	November 8, 2023	84000 ppm *flame out*
CV2352 TD-45' L-10'	November 8, 2023	No reading
CV2353	November 8, 2023	1200 ppm
CV2342A	November 8, 2023	669 ppm

# **TVA/IRwin Field Measurement Data**

Flag	Time	EPA	EPA	SCS	Location Description	LAT	LON
		Reading	Inspector	Readin			
				g			
1	11/8/23	3100	SC	N/A	CV-2303	Data Not	
		ppm				Available	
2	11/8/23	672 ppm	SC	N/A	H1769A H-17	Data Not	
						Available	
3	11/8/23	1216	SC	N/A	H1964C	Data Not	
		ppm				Available	
4	11/8/23	No	SC	N/A	TC-2385N	Data Not	
		reading				Available	
5	11/8/23	No	SC	N/A	H1754N	Data Not	
		reading				Available	

6	11/8/23	No	SC	N/A	H-67	Data Not
	11,0,23	reading		'','	57	Available
7	11/8/23	No	SC	N/A	CV-2304	Data Not
,	11, 5, 25	reading		'','		Available
8	11/8/23	No	SC	N/A	CV-2302	Data Not
	, _, _,	reading		,		Available
9	11/8/23	No	SC	N/A	CV-100	Data Not
		reading		'		Available
10	11/8/23	300 ppm	SC	N/A	H-1753S	Data Not
						Available
11	11/8/23	No	SC	N/A	H-1758N	Data Not
		reading				Available
12	11/8/23	No	SC	N/A	H-1563N	Data Not
		reading				Available
13	11/8/23	No	SC	N/A	H1962S TD-92' L-65'	Data Not
		reading				Available
14	11/8/23	No	SC	N/A	W1757N	Data Not
		reading				Available
15	11/8/23	No	SC	N/A	CV2340 TD-52' L-31'	Data Not
		reading				Available
16	11/8/23	1900	SC	N/A	CV2339	Data Not
		ppm				Available
17	11/8/23	No	SC	N/A	H-1562N	Data Not
	<u> </u>	reading				Available
18	11/8/23	No	SC	N/A	H1756N	Data Not
	/ . /	reading		2.12		Available
19	11/8/23	34,400	SC	N/A	CV1532A	Data Not
20	11/0/22	ppm	66	21/2	0) /4 500	Available
20	11/8/23	2200	SC	N/A	CV1532	Data Not
24	11/0/22	ppm	66	N1/A	1147546	Available
21	11/8/23	No	SC	N/A	H1751S	Data Not
22	11/0/22	reading	SC.	N/A	CV/1E24A	Available Data Not
22	11/8/23	9600	SC	IN/A	CV1534A	Data Not Available
23	11/8/23	ppm No	SC	N/A	H1561C	Data Not
23	11/0/23	reading	30	IN/A	1112016	Available
24	11/8/23	812 ppm	SC	N/A	CV1534	Data Not
24	11/0/23	OTZ Phili	30	IN/ A	CV1334	Available
25	11/8/23	No	SC	N/A	H1755N	Data Not
	11/0/23	reading		' ' ' '	1117 J J N	Available
26	11/8/23	1136	SC	N/A	CV2354 TD-50' L-7'	Data Not
	11,0,23	ppm		'','	3,52331103017	Available
27	11/8/23	84000	SC	N/A	TC-2382W	Data Not
	11,0,23	ppm		'','	.0 230211	Available
		*flame				
		out*				
		1	1			

28	11/8/23	No	SC	N/A	CV2352 TD-45' L-10'	Data Not	
		reading				Available	
29	11/8/23	1200	SC	N/A	CV2353	Data Not	
		ppm				Available	
30	11/8/23	669 ppm	SC	N/A	CV2342A	Data Not	
						Available	
A1	1/9/24	2200	GG	530	CV2303	34.43553	-118.64967
	10:00						
A2	1/9/24	789	GG	569		Data Not	
	10:24					Available	
A3	1/9/24	2200	GG	640	CV2303	34.43553	-118.64967
	10:31						
A3	1/9/24	881	DJH	N/A	CV2303	34.434027	-118.65023
	10:33	110=				0.4.400000	110 550105
A4	1/9/24	1165	DJH	N/A		34.433835	-118.650126
A 4	10:36	1100	66	000		24 422025	440.050430
A4	1/9/24 10:38	1100	GG	800		34.433835	-118.650126
A5	1/9/24	590	GG	620		34.433863	-118.650474
AS	1/9/24	390	GG	620		34.433803	-118.050474
A5	1/9/24	439	DJH	N/A		34.433863	-118.650474
AS	10:44	439	חנט	IN/ A		34.433603	-110.030474
A6	1/9/24	1100	GG	1300	CV2342A	Data Not	
Αυ	10:50	1100	00	1300	CVZSTZA	Available	
A7	1/9/24	653	DJH	1500	Near CV2353	34.434294	-118.650563
	10:51						
A7	1/9/24	507	SC	N/A		34.434067	-118.65014
	10:51						
A8	1/9/24	731	GG	1000	CV2353 along pipe	Data Not	
	10:57					Available	
A8	1/9/24	741	SC	N/A	Header pipe between	34.434452	-118.650754
	10:58				CV2353 and CV2342		
D1	1/9/24	1038	SC	3800	Up and down pipe	34.434435	-118.650422
	10:58						
A8	1/9/24	1083	SC	N/A	Header pipe between	34.434448	-118.650555
	10:59				CV2353 and CV2342		
A8	1/9/24	863	SC	N/A	Header pipe between	34.43488	-118.650925
	11:06				CV2353 and CV2342		
A9	1/9/24	840	GG	820	CV2352 whole area	34.444517	-118.65808
	11:09						
D2	1/9/24	1144	DJH	4000	Erosion area	34.435104	-118.650971
	11:09	105-				0.000	440
A9	1/9/24	1225	SC	N/A	Area near well	34.435187	-118.651085
D.2	11:13	1000	5.11	0.40	CV2352	24 425246	440.650004
D3	1/9/24	1999	DJH	940	Depression above	34.435216	-118.650984
	11:13				CV2351		

A10	1/924 11:15	8000	GG	1800	CV24141 whole area	Data Not Available	
D4	1/9/224 11:19	12206	DJH	2%	CV24143	34.435061	-118.651087
D4	1/9/24 11:20	7920	SC	N/A	CV24143	34.43501	-118.651158
D5	1/9/24 11:25	670	SC	N/A	CV24140	34.434693	-118.65104
D5	1/9/24 11:27	700	DJH	800	CV24140	34.434741	-118.650999
A11	1/9/24 11:31	773	GG	600	CV24139	34.434525	-118.650954
D6	1/9/24 11:31	703	SC	N/A	Area gas leak between CV2352 and CV24142	34.434409	-118.651155
D6	1/9/24 11:34	863	SC	N/A	Area gas leak between CV2352 and CV24142	34.434449	-118.65105
D8	1/9/24 11:36	1268	SC	N/A	Area gas leak near well H-2275B	34.434141	-118.651264
D8	1/9/24 11:38	1235	SC	N/A	Area gas leak near well H-2275B	34.434173	-118.651222
A12	1/9/24 11:40	1356	GG	1000	CV24138	Data Not Available	
D9	1/9/24 11:46	1715	SC	N/A		34.43388	-118.650871
D7	1/9/24 11:47	1993	DJH	800	CV1534A	34.433699	-118.650707
A13	1/9/24 11:48	7000	GG	7000	Flameout at H1751S	Data Not Available	
D10	1/9/24 11:50	674	SC	N/A		34.433735	-118.65071
S1	1/9/24 13:48	3000	DJH	1500	H-1568S	34.432465	-118.646927
G13	1/9/24 13:50	1456	GG	650	Base of Well H-2274B	34.432498	-118.646535
S2	1/9/24 13:59	610	DJH	550	Exposed waste	34.432302	-118.646464
G14	1/9/24 14:04	4500	GG	4600	Base of Well H-2275E	34.432406	-118.646236
S3	1/9/24 14:06	723	SR	800	Mulch, exposed waste, broader area (flags S3 and S5 consolidated here)	34.432045	-118.646187
G15	1/9/24 14:11	874	GG	520	Base of Well H17635	34.432408	-118.646087

S4	1/9/24 14:13	1200	SR	555	Erosion under pipe	34.431949	-118.646484
G16	1/9/24 14:20	990	GG	900	Long 9 inch diameter pipe between wells H17635 and H17645	34.432388	-118.645875
G17	1/9/24 14:23	10810	GG	10000	Base of well H17645	34.43237	-118.645734
S6	1/9/24 14:26	1944	SR	1100	H-1571S	34.432138	-118.645254
S7	1/9/24 14:27	2000	DJH	1000	CV-1604	34.432161	-118.64505
G18	1/9/24 14:30	947	GG	974	Base of well H1764S and H19616	34.432147	-118.645386
S8	1/9/24 14:32	700	SR	1700	H1572S	34.432163	-118.644736
S9	1/9/24 14:49	2400	DJH	1400	CV1602S (abandoned well)	34.431302	-118.647638
G19	1/9/24 14:51	3094	GG	6800	Base of well H1408	34.431412	-118.647566
S10	1/9/24 14:55	800	DJH	600	Gully, broader area	34.431341	-118.648116
G20	1/9/24 15:00	900	GG	2200	Base of well H2272C	34.431622	-118.648375
G21	1/9/24 15:04	1000	GG	978	Base of well H216A	34.431806	-118.648648
S11	1/9/24 15:07	1500	DJH	900	Gully with exposed waste, exceedances up and down gully	34.432016	-118.649629
G22	1/9/24 15:09	1113	GG	1169	Base of well H2274B	34.432339	-118.648968
S12	1/9/24 15:11	899	SR	1160	Pipe sunk into ground with exposed waste, by CV2348	34.432166	-118.64956
G23	1/9/24 15:14	1235	GG	2700	Base of well H2275W	34.432233	-118.649368
S13	1/9/24 15:18	15246	SR	1%	Well 2345	34.432731	-118.650116
G24	1/9/24 15:21	4991	GG	5184	Between wells H1450 and H17575	34.432649	-118.649715
S14	1/9/24 15:24	1700	DJH	792	Gully, multiple in area	34.433104	-118.650216
S15	1/9/24 15:25	2365	SR	1500	H-17705	34.43314	-118.650126



FIGURE 1: IRWIN 438: SURFACE EMISSIONS MONITORING PATH WITH MONITORED EXCEEDANCES AND IDENTIFIERS, 1/9/24



FIGURE 2: IRWIN 439: SURFACE EMISSIONS MONITORING PATH WITH MONITORED EXCEEDANCE CONCENTRATIONS, 1/9/24