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**PUBLIC HEALTH SERVICES
ENVIRONMENTAL HEALTH DIVISION**

February 26, 2026

Chris Nichelson
MILAN REI X, LLC
701 South Parker St., Suite 5200
Orange, CA 92868

Sent via email: chris@milancap.com

Subject: Modification of Truck Hauling Route for Clean Imported Soil for Mabury Residential Development dated February 23, 2026 for Rio Santiago Disposal Site located at 6145 E. Santiago Canyon Road, Orange, CA (SWIS No. 30-AB-0472)

Dear Mr. Nichelson:

The Orange County Health Care Agency, Environmental Health Division is the certified local enforcement agency (LEA) for Orange County, and authorized and obligated to enforce solid waste laws and regulations pursuant to California Public Resource Code (PRC) Sections 43209 and 45000 et seq., and Title 14 of the California Code of Regulations (14 CCR) § 18080 et seq. Pursuant to PRC Section 43200.5(b), in enforcing Part 4, 5 and 6 of Division 30 of the PRC and regulations that implement them, the LEA carries out a state function and thus its actions are independent from, and not subject to the authority of, the Orange County Board of Supervisors.

On June 16, 2022, Milan and the LEA signed a Stipulated Notice & Order (SNO) that required Milan to conduct soil analytical and geotechnical investigation/testing of the site within specified timelines. If solid waste capable of producing methane upon decomposition, concentrations of methane gas subject to monitoring and control under 27 CCR Section 20921, or substances at concentrations that pose a risk to human health or the environment were found at the site, the SNO required Milan to close the site as consistent with solid waste facility regulations and implement a remediation plan that included a post-closure maintenance plan and land use plan in accordance with 27 CCR. In addition, the SNO required Milan to conduct analytical investigation/testing of the site's stockpiles and to remove (in accordance with an approved plan) all stockpiles that the LEA determines are contaminated based on the results of the stockpiles' analytical investigation/testing. The SNO was subsequently amended on July 1, 2024 (Amendment No. 1), and again on October 31, 2025 (Amendment No. 2). On February 19, 2025, Milan executed a cleanup agreement for regulatory oversight with the Santa

Ana Regional Water Quality Control Board (SARWQCB) for reviewing the investigation data conducted to date under LEA's oversight and for the remaining pending investigatory work.

On December 10, 2025, Verdantas Inc. (on behalf of Milan) submitted a proposal (with supplemental information submitted on December 22 & 23, 2025) to the LEA and SARWQCB requesting alteration of Stockpile H to accommodate a truck hauling route for the proposed Mabury Residential Development located to the north of the subject site. On December 23, 2025, the SARWQCB approved the subject proposal with conditions. On January 9, 2026, the LEA issued a letter to Milan concurring with the SARWQCB approval in accordance with Amendment No. 2 of the SNO.

On February 12, 2026, Milan informed the LEA that an alteration to Stockpile H (originally proposed) is no longer necessary to transport clean imported soil to the Mabury Residential Development as Milan intends to use an existing haul route at the site. On February 23, 2026, Verdantas Inc. submitted a letter summarizing the modified truck hauling route through the Rio Santiago site, along with an email correspondence from SARWQCB dated February 23, 2026, with no objections to the modified proposal. The LEA also concurs with the modified truck hauling route with the following conditions:

1. This approval is only for use of the site for the proposed truck hauling route to transport clean imported fill from an off-site source to the Maybury Residential Development site. The site may not be used for any additional processing, mixing, or storing of the clean imported fill.
2. The LEA must be notified well in advance (minimum of 2 weeks) if soil hauling activities take longer than the anticipated 4 months as additional approval will be required.
3. Site security should be maintained during soil hauling activities to prevent unauthorized access to the site.
4. Overall proposed engineering controls and erosion measures shall be implemented at the site to prevent public nuisance to dust, noise, track outs, etc.
5. None of the on-site stockpiles (B through N) must be disturbed, altered, or moved during earthing and soil hauling activities.
6. The LEA should be notified at least 72 hours prior to start of fieldwork activities at the site.
7. The LEA should be notified immediately in writing if there are any deviations to the proposed hauling route. Please note the LEA will require adequate time for further review and approval of such changes depending on the scope.

This approval does not relieve Milan of the responsibility to obtain approvals/permits from other regulatory agencies as appropriate and necessary to commence the soil hauling activities.

Chris Nichelson
February 26, 2026
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If you have any questions, please contact me by phone at (714) 433-6255 or by email at dweerasekera@ochca.com

Sincerely,

Dan Weerasekera
Hazardous Materials Specialist
Solid Waste Local Enforcement Agency
Environmental Health Division

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