



CHIQUITA CANYON

A Waste Connections Company

December 1, 2023

Via E-Mail and Certified Mail

Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force
c/o County of Los Angeles Department of Public Works
Environmental Programs Division
P.O. Box 1460
Alhambra, CA 91802-1460
taskforce@dpw.lacounty.gov
coyola@pw.lacounty.gov

Re: Chiquita Canyon, LLC's Thirty-Second Monthly Update

Dear Members of the Integrated Waste Management Task Force:

Chiquita Canyon, LLC ("Chiquita") received a letter from the Integrated Waste Management Task Force (the "Task Force") dated April 19, 2021. The Task Force's letter requests that Chiquita provide monthly updates concerning a Notice of Violation ("NOV") that the County of Los Angeles Department of Regional Planning ("DRP") issued to Chiquita on June 11, 2020. The NOV alleges non-compliance with Conditions 68, 77, 79 and 113 of Chiquita's Conditional Use Permit ("CUP"). Chiquita previously provided monthly updates to the Task Force from April 2021 through October 2023. This letter serves as Chiquita's thirty-second monthly update.

On December 2, 2021, the County of Los Angeles Department of Public Works ("PW") requested that these monthly updates include additional details concerning any NOVs issued by regulatory agencies and Chiquita's actions to mitigate those NOVs. This letter provides additional details concerning the NOVs issued since the 31st Monthly Update letter and Chiquita's actions to mitigate those NOVs.

On August 15, 2022, PW requested that these monthly updates clearly indicate whether or not Chiquita received an NOV from any regulatory agencies during the reporting month and, if so, that Chiquita include a copy of the NOV as an attachment to the letter. Since the last monthly update, Chiquita received ten NOVs from the South Coast Air Quality Management District ("SCAQMD") for alleged violations of SCAQMD Rule 402 and Health & Safety Code section 41700 dated from November 2 to 29, 2023. Copies of these NOVs are enclosed in Attachment A. On November 15, 2023, SCAQMD issued Chiquita an NOV dated October 5, 2023 for alleged

violations of SCAQMD Rules 221(a), 1150(b)(2), and 3002(c)(1) as well as provisions of Chiquita's Title V Permit and Permit to Operate G43917. A copy of this NOV is provided at Attachment B. On November 16, 2023, SCAQMD issued Chiquita an NOV dated October 6, 2023 for alleged violations of SCAQMD Rules 3002(c)(1) and 430(b)(1) as well as provisions of Chiquita's Title V Permit and Permit to Operate G66132. A copy of this NOV is provided at Attachment C. On November 22, 2023, the Los Angeles Regional Water Quality Control Board ("RWQCB") issued Chiquita an NOV for alleged violations of waste discharge requirements ("WDRs") Order No. R4-2018-0172 and a Monitoring and Reporting Program. A copy of this NOV is provided at Attachment D.

On October 16, 2023, the Facility and Plan Review Subcommittee requested that these monthly updates include a detailed update on the status of Chiquita's compliance with its Stipulated Order for Abatement with SCAQMD and any other mitigation measures imposed by other regulatory agencies.¹ Detailed information on Chiquita's implementation of the Stipulated Order can be found in the chart enclosed as Attachment E.

June 2020 DRP NOV

Chiquita has reached a settlement agreement with the County of Los Angeles (the "County"), which includes terms affecting Conditions 77 and 79. This settlement agreement was approved by the County Board of Supervisors on October 11, 2022. The settlement agreement requires Chiquita to submit an application to modify its CUP consistent with the terms of the settlement agreement. Those terms include proposed modifications to Conditions 77 and 79. Chiquita submitted the required CUP modification application on November 10, 2022. The hearing on the June 2020 NOV is stayed pending the outcome of this CUP modification process.

Chiquita continues to work on securing the permits and approvals required to begin construction on the new entrance along Wolcott Way under Conditions 77 and 79. Chiquita has provided updates on the June 11, 2020 NOV and Conditions 77 and 79 during previous meetings of the Chiquita Canyon Landfill Community Advisory Committee (the "CAC"). A link to these previous meetings and meeting materials summarizing the status of Chiquita's implementation of activities related to Conditions 77 and 79 can be found on DRP's website, here <https://planning.lacounty.gov/public-hearings-and-meetings/chiquita-canyon-landfill/community-advisory-committee/>. Chiquita is happy to continue to provide these updates at future CAC meetings if requested.

SCAQMD Rule 402 NOVs

The SCAQMD Rule 402 NOVs were issued due to odors that allegedly emanated from the Chiquita Canyon Landfill (the "Landfill"). The source of any odors coming from the Landfill is a

¹ On November 21, 2023, Chiquita received a letter from the Local Enforcement Agency ("LEA") requiring Chiquita to implement additional mitigation measures. Chiquita is discussing these mitigation measures with the LEA and will provide a chart detailing Chiquita's implementation of these mitigation measures in the next monthly update letter.

large and unexpected increase in the production of landfill gas and liquids at the Landfill. This increase in landfill gas and liquids production is due to an abnormal biotic or abiotic process (a reaction) taking place within a portion of the Landfill waste mass. Chiquita has retained a toxicologist to review air monitoring data and, based on August and September 2023 air monitoring data, no adverse health effects are anticipated across the community. More information on the landfill reaction, recent air monitoring data, and analyses from Chiquita's toxicologists can be found on Chiquita's website.

On September 6, 2023, Chiquita entered into a Stipulated Order for Abatement with the SCAQMD to address the SCAQMD Rule 402 NOV's issued by SCAQMD inspectors as a result of the landfill reaction. The Stipulated Order contains both short-term and long-term measures designed to slow the underlying reaction and mitigate the impacts felt in the community. More information on Chiquita's implementation of the Stipulated Order can be found in Chiquita's monthly reports to the SCAQMD, which are posted the Odor Mitigation page of Chiquita's website, here: <https://chiquitacanyon.com/reports/odor-mitigation/>.

In September 2020, Chiquita submitted a permit application to SCAQMD for a new flare that would allow the Landfill to better control the increasing quantity of gas. On September 28, 2023, after SCAQMD and U.S. Environmental Protection Agency review, Chiquita received the permit from SCAQMD. On October 10, 2023, Chiquita received the new flare onsite. Chiquita put the new flare into operation on November 15, and notified SCAQMD on November 17, as required by the Stipulated Order. Additional information on Chiquita's compliance with the conditions of the Stipulated Order is provided in Attachment E.

October 5, 2023 SCAQMD NOV

The October 5 SCAQMD NOV alleges, among other things, that Chiquita is excavating the Landfill without an approved Excavation Management Plan. The activities forming the basis for this NOV are a portion of the corrective action that Chiquita is taking to mitigate the impacts of the reaction and address the leachate violations noted in the September 19, 2023 LEA Site Inspection Report discussed in the 31st Monthly Update letter. Specifically, pressure from excess gas and liquids caused a portion of the western slope of the reaction area to move off of the landfill liner. This also caused leachate seeps to reach the concrete stormwater channels. Chiquita has conducted construction and repair work to remove any waste that was off of the landfill liner, reconstruct the slope, and redirect leachate seepage so that it remains fully on the lined area of the Landfill and flows into a new sump area for prompt collection and offsite disposal. The lower portion of the western slope is now covered with a temporary scrim (temporary cover). Chiquita is in the process of cleaning the stormwater channels, and no leachate reached the facility's stormwater pond. Chiquita performed this construction and repair work in order to comply with LEA regulations and under LEA oversight and jurisdiction. Chiquita is discussing this NOV with SCAQMD and will further address this NOV based on the results of that discussion.

October 6, 2023 SCAQMD NOV

The October 6 SCAQMD NOV alleges that Chiquita is failing to maintain its leachate collection and storage system in good operating condition, is failing to prevent landfill gas condensate vapors from entering the atmosphere, and failed to report a breakdown or malfunction of the leachate collection and storage system within one hour. The factual bases underlying this NOV are unclear to Chiquita. Chiquita is discussing this NOV with SCAQMD to better understand the alleged violations. Chiquita will address this NOV based on the results of that discussion. To the extent this NOV is based on the recent leachate seeps observed at the Landfill, as described in more detail in Chiquita's 31st Monthly Update letter, Chiquita is implementing several mitigation measures to address these leachate seeps, including the construction and repair work on the west side of the Landfill, improving the Landfill's dewatering capacity, and redirecting excess liquids into the Landfill's leachate collection and storage system.

November 22, 2023 RWQCB NOV

The November 22 RWQCB NOV alleges that Chiquita failed to prevent the commingling of leachate and gas condensate with surface water during rain events and failed to report a leachate seep as required by Chiquita's WDRs. To address the commingling issue, as part of the construction work described above, Chiquita has redirected the leachate that was reaching the stormwater channels and is cleaning those channels. Chiquita has also installed an earthen stormwater control berm along the top of the scrim that redirects stormwater away from the area with leachate seeps so that it does not commingle with leachate. As required by the NOV, Chiquita is preparing a formal written response to the RWQCB by December 22, 2023.

Chiquita looks forward to continuing to provide the Task Force with updates on the June 11, 2020 NOV and any NOVs issued by regulatory agencies. Should you have any questions, please feel free to contact me.

Regards,



Steve Cassulo
District Manager
Chiquita Canyon, LLC

Attachments: A – Rule 402 NOVs from the SCAQMD
B – October 5, 2023 SCAQMD NOV
C – October 6, 2023 SCAQMD NOV
D – November 22, 2023 RWQCB NOV
E – Chart of Chiquita's Implementation of the Stipulated Order for Abatement

Integrated Waste Management Task Force
c/o Los Angeles County Department of Public Works
December 1, 2023
Page 5 of 5

cc: David Nguyen, Department of Public Works (*via email*)
Omid Mazdiasni, Department of Public Works (*via email*)

Attachment A



South Coast Air Quality Management District
21865 COPLEY DRIVE, DIAMOND BAR, CA 91765-4178

P 75750

NOTICE OF VIOLATION

DATE OF VIOLATION

Month: 11 Day: 02 Year: 2023

Facility Name: Chiquita Canyon Landfill		Facility ID#: 119219	Sector: VB
Location Address: 29201 Henry Mayo Drive		City: Castaic	Zip: 91384
Mailing Address: 29201 Henry Mayo Drive		City: Castaic	Zip: 91384

YOU ARE HEREBY NOTIFIED THAT YOU HAVE BEEN CITED FOR ONE OR MORE VIOLATIONS OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT (SCAQMD) RULES, STATE LAW OR FEDERAL LAW. IF PROVEN, SUCH VIOLATION(S) MAY RESULT IN THE IMPOSITION OF CIVIL OR CRIMINAL PENALTIES.

EACH DAY A VIOLATION OCCURS MAY BE HANDLED AS A SEPARATE OFFENSE REGARDLESS OF WHETHER OR NOT ADDITIONAL NOTICES OF VIOLATION ARE ISSUED.

DESCRIPTION OF VIOLATIONS

#	Authority*	Code Section or Rule No.	SCAQMD Permit to Operate or CARB Registration No.	Condition No. (If Applicable)	Description of Violation
1	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	12402			For discharging such quantities of air contaminants to cause injury, detriment, nuisance or annoyance to a considerable number of persons.
2	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	41700			For discharging such quantities of air contaminants to cause injury, detriment, nuisance or annoyance to a considerable number of persons.
3	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
4	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
5	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				

Served To: Steve Cassulo	Phone: 661 371-9214	Served By: Karen Woullard	Date Notice Served: 11/02/2023
Title: District Manager	Email: steven.cassulo@wasteconnections.com	Phone No: <input checked="" type="checkbox"/> 909-396-2285 <input type="checkbox"/> 310-233-	Email: kwoullard@aqmd.gov

*Key to Authority Abbreviations:

SCAQMD – South Coast Air Quality Management District
CCR – California Code of Regulations

CH&SC – California Health and Safety Code
CFR – Code of Federal Regulations

Method of Service:

☒ In Person ☐ Certified Mail

VIOLATOR'S COPY



South Coast Air Quality Management District
21865 COPLEY DRIVE, DIAMOND BAR, CA 91765-4178

P 78426

NOTICE OF VIOLATION

DATE OF VIOLATION		
Month:	Day:	Year:
11	06	23

Facility Name: CHIVITA CANYON LLC		Facility ID#: 119219	Sector: VB
Location Address: 29201 HENRY MAYO DRIVE		City: CASTAIC	Zip: 91384
Mailing Address: 29201 HENRY MAYO DRIVE		City: CASTAIC	Zip: 91384

YOU ARE HEREBY NOTIFIED THAT YOU HAVE BEEN CITED FOR ONE OR MORE VIOLATIONS OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT (SCAQMD) RULES, STATE LAW OR FEDERAL LAW. IF PROVEN, SUCH VIOLATION(S) MAY RESULT IN THE IMPOSITION OF CIVIL OR CRIMINAL PENALTIES.

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1	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	402		_____ _____ _____	For discharging such quantities of air contaminants to cause injury, detriment, nuisance, or annoyance to a considerable number of persons
2	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	41700		_____ _____ _____	" "
3	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR			_____ _____ _____	
4	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR			_____ _____ _____	
5	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR			_____ _____ _____	

Served To: Steve Cassulo	Phone: 661 371 9214	Served By: Avelly Gil Rojas	Date Notice Served:
Title: District Manager	Email: Steve.Cassulo@wastecollections.com	Phone No: <input checked="" type="checkbox"/> 909-396-2183 <input type="checkbox"/> 310-233-	Email: arajas@aqmd.gov
*Key to Authority Abbreviations: SCAQMD - South Coast Air Quality Management District CCR - California Code of Regulations		Method of Service: <input checked="" type="checkbox"/> In Person <input type="checkbox"/> Certified Mail	



NOTICE OF VIOLATION

DATE OF VIOLATION		
Month:	Day:	Year:
11	10	23

Facility Name: CHIQUITA CANYON LANDFILL		Facility ID#: 119219	Sector: VB
Location Address: 29201 Henry Mayo Drive		City: Castaic	Zip: 91384
Mailing Address: 29201 Henry Mayo Drive		City: Castaic	Zip: 91384

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1	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	Rule 402			For discharging such quantities of air contaminants to cause injury, detriment, nuisance or annoyance to a considerable number of persons.
2	<input type="checkbox"/> SCAQMD <input checked="" type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	California H&S Code Sec 41700			
3	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
4	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
5	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				

Served To: Steve Cassulo	Phone: (661) 371-9214	Served By: Lawrence B. Israel	Date Notice Served: 11-10-23
Title: District Manager	Email: SteveC@wasteconnections.com	Phone No: <input checked="" type="checkbox"/> 909-396-2370 <input type="checkbox"/> 310-233-	Email: l.israel@aqmd.gov

*Key to Authority Abbreviations:

SCAQMD - South Coast Air Quality Management District
CCR - California Code of Regulations

CH&SC - California Health and Safety Code
CFR - Code of Federal Regulations

Method of Service: **By electronic mail**
☒ In Person ☐ Certified Mail



South Coast Air Quality Management District
21865 COPLEY DRIVE, DIAMOND BAR, CA 91765-4178

P 75320

NOTICE OF VIOLATION

DATE OF VIOLATION

Month:	Day:	Year:
11	13	23

Facility Name: Chiquita Canyon Landfill		Facility ID#: 114219	Sector: VB
Location Address: 29201 Henry Mayo Drive		City: Castaic	Zip: 91384
Mailing Address: 29201 Henry Mayo Drive		City: Castaic	Zip: 91384

YOU ARE HEREBY NOTIFIED THAT YOU HAVE BEEN CITED FOR ONE OR MORE VIOLATIONS OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT (SCAQMD) RULES, STATE LAW OR FEDERAL LAW. IF PROVEN, SUCH VIOLATION(S) MAY RESULT IN THE IMPOSITION OF CIVIL OR CRIMINAL PENALTIES.

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#	Authority*	Code Section or Rule No.	SCAQMD Permit to Operate or CARB Registration No.	Condition No. (If Applicable)	Description of Violation
1	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	4102		_____	For discharging such quantities of air contaminants to cause injury, detriment, nuisance or annoyance to a considerable number of persons
2	<input type="checkbox"/> SCAQMD <input checked="" type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	41700		_____	
3	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR			_____	
4	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR			_____	
5	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR			_____	

Served To: Steve Cassato Nancy Batena T.V. 11/13/23	Phone: 661.257.3655	Served By: Tracy Allen V4	Date Notice Served: 11.13.23
Title: District Manager Operations Administrator T.V. 11/13/23	Email:	Phone No: <input checked="" type="checkbox"/> 909-396-2673 <input type="checkbox"/> 310-233-	Email: tallen v4 @ aqmd.gov

*Key to Authority Abbreviations:

SCAQMD – South Coast Air Quality Management District
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CH&SC – California Health and Safety Code
CFR – Code of Federal Regulations

Method of Service:

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VIOLATOR'S COPY



South Coast Air Quality Management District
21865 COPLEY DRIVE, DIAMOND BAR, CA 91765-4178

P 77664

NOTICE OF VIOLATION

DATE OF VIOLATION		
Month:	Day:	Year:
11	14	2023

Facility Name: CHIQUITA CANYON LANDFILL		Facility ID#: 119219	Sector: VB
Location Address: 29201 HENRY MAYO DRIVE		City: CASTAIC	Zip: 91384
Mailing Address: 29201 HENRY MAYO DRIVE		City: CASTAIC	Zip: 91384

YOU ARE HEREBY NOTIFIED THAT YOU HAVE BEEN CITED FOR ONE OR MORE VIOLATIONS OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT (SCAQMD) RULES, STATE LAW OR FEDERAL LAW. IF PROVEN, SUCH VIOLATION(S) MAY RESULT IN THE IMPOSITION OF CIVIL OR CRIMINAL PENALTIES.

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#	Authority*	Code Section or Rule No.	SCAQMD Permit to Operate or CARB Registration No.	Condition No. (If Applicable)	Description of Violation
1	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	Rule 402			FOR DISCHARGING SUCH QUANTITIES OF AIR CONTAMINANTS TO CAUSE INJURY, DETRIMENT, NUISANCE OR ANNOYANCE TO A
2	<input type="checkbox"/> SCAQMD <input checked="" type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	CH&SC 41700			CONSIDERABLE NUMBER OF PERSONS.
3	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
4	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
5	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				

Served To: STEVE CASOULO	Phone: 661.371.9214	Served By: HUGO CAMPOS	Date Notice Served: 11/14/2023
Title: DISTRICT MANAGER	Email: steve.ca@wasteconnections.com	Phone No: <input checked="" type="checkbox"/> 909-396-2110 <input type="checkbox"/> 310-233-	Email: hcampos@aqmd.gov

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CFR – Code of Federal Regulations

Method of Service:

☐ In Person

☐ Certified Mail

VIIOLATOR'S COPY



South Coast Air Quality Management District
21865 COPLEY DRIVE, DIAMOND BAR, CA 91765-4178

P 79071

NOTICE OF VIOLATION

DATE OF VIOLATION		
Month:	Day:	Year:
11	15	2023

Facility Name: CHIQUITA CANYON LANDFILL		Facility ID#: 119219	Sector: VB
Location Address: 29201 HENRY MAYO DRIVE		City: CASTAIC	Zip: 91384
Mailing Address: 29201 HENRY MAYO DRIVE		City: CASTAIC	Zip: 91384

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#	Authority*	Code Section or Rule No.	SCAQMD Permit to Operate or CARB Registration No.	Condition No. (If Applicable)	Description of Violation
1	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	RULE 402		_____	FOR DISCHARGING SUCH QUANTITIES OF AIR CONTAMINANTS TO CAUSE INJURY, DETRIMENT, NUISANCE OR ANNOYANCE TO A CONSIDERABLE NUMBER OF PERSONS
2	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	CALH&S CODE A1700		_____	
3	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR			_____	
4	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR			_____	
5	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR			_____	

Served To: STEVE CASSULO		Phone: 661-371-9214	Served By: DANIEL del ROSARIO	Date Notice Served: 11-15-2023
Title: DISTRICT MANAGER	Email: STEVEN.CASSULO@WASTECONNECTIONS.COM	Phone No: <input checked="" type="checkbox"/> 909-396-2062 <input type="checkbox"/> 310-233-	Email: DDELROSARIO@aqmd.gov	

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CCR – California Code of Regulations

CH&SC – California Health and Safety Code
CFR – Code of Federal Regulations

Method of Service:

☒ In Person

☐ Certified Mail

VIOLATOR'S COPY



NOTICE OF VIOLATION

DATE OF VIOLATION		
Month: 11	Day: 16	Year: 23

Facility Name: <i>Chiquita Canyon Landfill</i>		Facility ID#: <i>119219</i>	Sector: <i>VB</i>
Location Address: <i>29201 Henry Mayo Dr.</i>		City: <i>Castaic</i>	Zip: <i>91384</i>
Mailing Address: <i>29201 Henry Mayo Dr.</i>		City: <i>Castaic</i>	Zip: <i>91384</i>

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1	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	<i>402</i>		_____	<i>For discharging such quantities of air contaminants to cause injury, detriment, nuisance or annoyance to a considerable number of persons</i>
2	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	<i>41700</i>		_____	
3	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR			_____	
4	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR			_____	
5	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR			_____	

Served To: <i>Steve Cassulo</i>	Phone: <i>661-371-9214</i>	Served By: <i>Heidee dela Cruz</i>	Date Notice Served: <i>11/16/23</i>
Title: <i>District Manager</i>	Email: <i>Steven.cassulo@wasteconnection.com</i>	Phone No: <input checked="" type="checkbox"/> 909-396-2176 <input type="checkbox"/> 310-233-	Email: <i>hdelaacruz@aqmd.gov</i>

*Key to Authority Abbreviations:

SCAQMD – South Coast Air Quality Management District
CCR – California Code of Regulations

CH&SC – California Health and Safety Code
CFR – Code of Federal Regulations

Method of Service:

☒ In Person

☐ Certified Mail



NOTICE OF VIOLATION

DATE OF VIOLATION		
Month:	Day:	Year:
11	28	2023

Facility Name:	Chiquita Canyon Landfill	Facility ID#:	119219	Sector:	VB
Location Address:	29201 Henry Mayo Drive	City:	Castaic	Zip:	91384
Mailing Address:	29201 Henry Mayo Drive	City:	Castaic	Zip:	91384

YOU ARE HEREBY NOTIFIED THAT YOU HAVE BEEN CITED FOR ONE OR MORE VIOLATIONS OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT (SCAQMD) RULES, STATE LAW OR FEDERAL LAW. IF PROVEN, SUCH VIOLATION(S) MAY RESULT IN THE IMPOSITION OF CIVIL OR CRIMINAL PENALTIES.

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DESCRIPTION OF VIOLATIONS

#	Authority*	Code Section or Rule No.	SCAQMD Permit to Operate or CARB Registration No.	Condition No. (If Applicable)	Description of Violation
1	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	402		— — —	For discharging such quantities of air contaminants to cause injury, detriment, nuisance or annoyance to a considerable number of persons.
2	<input type="checkbox"/> SCAQMD <input checked="" type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	41700		— — —	For discharging such quantities of air contaminants to cause injury, detriment, nuisance or annoyance to a considerable number of persons.
3	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR			— — —	
4	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR			— — —	
5	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR			— — —	

Served To:	Steve Cassulo	Phone:	661 371-9214	Served By:	Karen Woullard	Date Notice Served:	11/28/2023
Title:	District Manager	Email:	Steven.Cassulo@wasteconnections.com	Phone No:	<input checked="" type="checkbox"/> 909-396-2285 <input type="checkbox"/> 310-233-	Email:	Kwoullard @ aqmd.gov

*Key to Authority Abbreviations:

SCAQMD – South Coast Air Quality Management District
CCR – California Code of Regulations

CH&SC – California Health and Safety Code
CFR – Code of Federal Regulations

Method of Service:

☒ In Person

☐ Certified Mail



South Coast Air Quality Management District
21865 COPLEY DRIVE, DIAMOND BAR, CA 91765-4178

P 75990

NOTICE OF VIOLATION

DATE OF VIOLATION		
Month:	Day:	Year:
11	29	23

Facility Name: <i>Chiquita Canyon Landfill</i>	Facility ID#: <i>119219</i>	Sector: <i>VB</i>
Location Address: <i>29201 Henry Mayo Dr</i>	City: <i>Castaic</i>	Zip: <i>91384</i>
Mailing Address: <i>29201 Henry Mayo Dr</i>	City: <i>Castaic</i>	Zip: <i>91384</i>

YOU ARE HEREBY NOTIFIED THAT YOU HAVE BEEN CITED FOR ONE OR MORE VIOLATIONS OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT (SCAQMD) RULES, STATE LAW OR FEDERAL LAW. IF PROVEN, SUCH VIOLATION(S) MAY RESULT IN THE IMPOSITION OF CIVIL OR CRIMINAL PENALTIES.

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DESCRIPTION OF VIOLATIONS

#	Authority*	Code Section or Rule No.	SCAQMD Permit to Operate or CARB Registration No.	Condition No. (If Applicable)	Description of Violation
1	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	<i>Rule 402</i>			<i>For discharging such quantities of air contaminants to cause injury, detriment, nuisance or annoyance to a considerable number of persons.</i>
2	<input type="checkbox"/> SCAQMD <input checked="" type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	<i>CH 4175 41700</i>			<i>For discharging such quantities of air contaminants to cause injury, detriment, nuisance or annoyance to a considerable number of persons.</i>
3	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
4	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
5	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				

Served To: <i>Steve Cassulo</i>	Phone: <i>616-371-9214</i>	Served By: <i>Daniel Woo</i>	Date Notice Served: <i>11/29/23</i>
Title: <i>District Manager</i>	Email: <i>steveca@wasteconnections.com</i>	Phone No: <input checked="" type="checkbox"/> 909-396-2433 <input type="checkbox"/> 310-233-	Email: <i>DWoo @ aqmd.gov</i>

*Key to Authority Abbreviations:

SCAQMD – South Coast Air Quality Management District
CCR – California Code of Regulations

CH&SC – California Health and Safety Code
CFR – Code of Federal Regulations

Method of Service:

☒ In Person ☐ Certified Mail

VIOLATOR'S COPY



South Coast Air Quality Management District
21865 COPLEY DRIVE, DIAMOND BAR, CA 91765-4178

P 77665

NOTICE OF VIOLATION

DATE OF VIOLATION		
Month:	Day:	Year:
11	30	2023

Facility Name: CHUQUITA CANYON LANDFILL		Facility ID#: 119219	Sector: VB
Location Address: 29201 HENRY MAYO DRIVE	City: CASTAIC	Zip: 91384	
Mailing Address: 29201 HENRY MAYO DRIVE	City: CASTAIC	Zip: 91384	

YOU ARE HEREBY NOTIFIED THAT YOU HAVE BEEN CITED FOR ONE OR MORE VIOLATIONS OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT (SCAQMD) RULES, STATE LAW OR FEDERAL LAW. IF PROVEN, SUCH VIOLATION(S) MAY RESULT IN THE IMPOSITION OF CIVIL OR CRIMINAL PENALTIES.

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DESCRIPTION OF VIOLATIONS

#	Authority*	Code Section or Rule No.	SCAQMD Permit to Operate or CARB Registration No.	Condition No. (If Applicable)	Description of Violation
1	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	RULE 402		_____	FOR DISCHARGING SUCH QUANTITIES OF AIR CONTAMINANTS TO CAUSE INJURY, DETRIMENT, NUISANCE OR ANNOYANCE TO A CONSIDERABLE NUMBER OF PERSONS.
2	<input type="checkbox"/> SCAQMD <input checked="" type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	CH&SC 41700		_____	
3	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR			_____	
4	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR			_____	
5	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR			_____	

Served To: STEVE CASULLO	Phone: (661)-371-9214	Served By: HUGO CAMPOS	Date Notice Served: 11/30/2023
Title: DISTRICT MANAGER	Email: stevecd@wasteconnections.com	Phone No: <input checked="" type="checkbox"/> 909-396-2110 <input type="checkbox"/> 310-233-	Email: hcampos@aqmd.gov

*Key to Authority Abbreviations:

SCAQMD – South Coast Air Quality Management District
CCR – California Code of Regulations

CH&SC – California Health and Safety Code
CFR – Code of Federal Regulations

Method of Service:

☒ In Person

☐ Certified Mail

VIOLATOR'S COPY

Attachment B



NOTICE OF VIOLATION

DATE OF VIOLATION		
Month:	Day:	Year:
10	5	2023

Facility Name: Chiquita Canyon Landfill		Facility ID#: 119219	Sector: VB
Location Address: 29201 Henry Mayo Dr.		City: Castaic	Zip: 91384
Mailing Address: 29201 Henry Mayo Dr.		City: Castaic	Zip: 91384

YOU ARE HEREBY NOTIFIED THAT YOU HAVE BEEN CITED FOR ONE OR MORE VIOLATIONS OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT (SCAQMD) RULES, STATE LAW OR FEDERAL LAW. IF PROVEN, SUCH VIOLATION(S) MAY RESULT IN THE IMPOSITION OF CIVIL OR CRIMINAL PENALTIES.

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DESCRIPTION OF VIOLATIONS

#	Authority*	Code Section or Rule No.	SCAQMD Permit to Operate or CARB Registration No.	Condition No. (If Applicable)	Description of Violation
1	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	1150(b)(2)			Excavation of a landfill without seeking approval of an Excavation Management Plan
2	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	221(a)			Failure to submit an Excavation Management Plan prior to initiating excavation
3	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	3002(c)(1)	G43917	12	Failure to maintain construction spoils and all working areas in moist conditions during active use for truck equipment trafficking
4	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	3002(c)(1)	G43917	14	Failure to ensure that no construction spoils are left on the landfill surface
5	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	3002(c)(1)	G43917	15	Failure to ensure that no material extend above the sides or rear of vehicles used to haul material
6	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	3002(c)(1)	G43917	17	Failure to completely cover exposed landfill trash after excavation activities when work was not actively in progress
7	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	3002(c)(1)	Section J	4	Failure to submit an Excavation Management Plan prior to initiating excavation

8	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	3002(c)(1)	Section K	8	Failure to comply with regulatory requirements and permit terms
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Served To: Steve Cassulo		Phone: 661-371-9214		Served By: Gerardo Vergara		Date Notice Served: 11/15/2023	
Title: District Manager		Email: steven.cassulo@wasteconnections.com		Phone No: <input checked="" type="checkbox"/> 909-396-2179		Email: gvergara@aqmd.gov	

*Key to Authority Abbreviations: SCAQMD – South Coast Air Quality Management District CCR – California Code of Regulations CH&SC – California Health and Safety Code CFR – Code of Federal Regulations				Method of Service: <input type="checkbox"/> In Person <input type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> Electronic Mail			
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What is a Notice of Violation?

A Notice of Violation is issued by an SCAQMD Air Quality Inspector to inform a business that a failure to comply with one or more applicable federal, state, and/or local (SCAQMD) air pollution rules and regulations or legal requirements is being alleged.

What happens when I receive a Notice of Violation?

If you are operating in violation of one or more applicable federal, state, and/or local (SCAQMD) air pollution rules and regulations or legal requirements, each day or part of a day that you operate in violation is considered a separate violation even if only one Notice of Violation has been issued. Continuing to operate in violation may subject you to substantial civil or criminal penalties. **It is in your best interest to resolve any compliance problem immediately before you resume operation.**

What if I need to continue to operate the equipment named in the Notice of Violation?

If continued operation of equipment cited in the Notice of Violation is necessary, you may be able to obtain a variance from SCAQMD's Hearing Board. A **variance** is an administrative order that allows a company to continue operating without penalties while it takes appropriate steps to meet air pollution control requirements. Proof of specific legal circumstances must be provided before a variance can be granted. Timeliness in seeking such relief will be considered by the Hearing Board. Additional information concerning variances can be found in California Health & Safety Code §§ 42350-42359.5 and at <http://www.aqmd.gov/home/about/hearing-board>.

During a hearing for a variance, you may be represented either by yourself or by your attorney or consultant. You will have the opportunity to present evidence and testimony, and to cross-examine any SCAQMD witness.

If you fail to comply with any order of the Hearing Board, you may be subject to additional civil or criminal penalties set forth in California Health & Safety Code §§ 42400 *et seq.* and 42402 *et seq.*

How are Notices of Violation resolved?

The SCAQMD General Counsel's office reviews each alleged violation and, based on the facts, determines how best to resolve the allegation. Options available to the General Counsel's office include:

- **Minor Source Penalty Assessment Program**

Certain Notices of Violation may be eligible for resolution through SCAQMD's Minor Source Penalty Assessment Program if they are issued to a minor source or for violations other than emitting air toxics or creating a

public nuisance involving injury or property damage.

If your case is handled by this program, you will receive a letter or phone call from an investigator in the SCAQMD General Counsel's office offering to settle your violation. Settlement terms usually call for a penalty payment and written proof of current compliance. The investigator's name and telephone number are included in the initial settlement letter in the event you would like to discuss the case.

Be prepared to describe any facts about the violation that you believe SCAQMD should know in considering your case. Sharing your knowledge of the facts, possible causes for the violation and plans to avoid future violations will help the investigator arrive at an appropriate disposition. **Be sure to respond by the date indicated in the letter to avoid further legal action.**

If the Minor Source Penalty Assessment Program fails to result in a settlement, your Notice of Violation may be referred to an SCAQMD attorney and handled under the procedures for Civil Prosecution or resolved through a Small Claims Court.

- **Civil Prosecution**

If your case is handled as a civil matter, it will be reviewed by an attorney from the SCAQMD General Counsel's office, who will typically make first contact with you through a letter that asks for information about your case. If the allegations in the Notice of Violation cannot be informally resolved, the SCAQMD is authorized to file a civil lawsuit in court to recover civil penalties. In cases involving serious harm or danger, however, SCAQMD may immediately commence a legal action for civil penalties and a court-ordered injunction. A **mandatory injunction** is a court order compelling a person and/or company to take specific action. A **prohibitory injunction** is a court order compelling a person and/or company to refrain from taking a specific action. Injunctions, which may even lead to shutting down a business, may be sought by SCAQMD to prevent continuing or serious violations or damages from occurring.

- **Criminal Prosecution**

If SCAQMD determines that criminal prosecution is appropriate, the case will be referred to the appropriate state or federal law enforcement agency. That agency will determine if criminal prosecution is warranted.

Civil and Criminal Penalties

Penalties are determined by California Health & Safety Code §§ 42400 *et seq.* and 42402 *et seq.*

Available Resources

You can obtain SCAQMD Rules, permit application forms, and detailed information about SCAQMD and the Hearing Board using the resources provided below:

Contact Numbers	Useful Links	
General Information:		
SCAQMD Headquarters General Number (909) 396-2218	About SCAQMD Enforcement Authority	http://www.aqmd.gov/home/about http://www.aqmd.gov/home/about/authority/enforcement
General Counsel's Office (909) 396-3400	Compliance Notices	http://www.aqmd.gov/home/regulations/compliance/compliance-notices
	SCAQMD Rules	http://www.aqmd.gov/home/regulations/rules
Obtaining Permit or Billing Information:		
Small Business Assistance (800) 388-2121	Getting Permits	http://www.aqmd.gov/home/permits
Permit Information (909) 396-2468	Permit Forms	http://www.aqmd.gov/home/permits/permit-application-forms
(866) 888-8838	Permitting Fees	http://www.aqmd.gov/home/permits/fees
Billing Services (909) 396-2900		
Variances:		
Clerk of the Hearing Board (909) 396-2500	The Hearing Board	http://www.aqmd.gov/home/about/hearing-board

Attachment C



NOTICE OF VIOLATION

DATE OF VIOLATION		
Month:	Day:	Year:
10	6	2023

Facility Name: Chiquita Canyon Landfill		Facility ID#: 119219	Sector: VB
Location Address: 29201 Henry Mayo Dr.		City: Castaic	Zip: 91384
Mailing Address: 29201 Henry Mayo Dr.		City: Castaic	Zip: 91384

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1	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	3002(c)(1)	G66132	2	Failed to maintain leachate collection system in good operating condition at all times
2	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	3002(c)(1)	G66132	6	Failed to prevent landfill gas condensate vapors from entering the atmosphere
3	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	3002(c)(1)	G66132	7	Failed to report breakdown or malfunction of gas condensate / leachate storage system within one hour
4	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	3002(c)(1)	Section K	8	Failed to comply with regulatory requirements and permit conditions
5	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	430(b)(1)			Failed to submit breakdown notification within one hour

Served To: Steve Cassulo		Phone: 661-371-9214	Served By: Gerardo Vergara	Date Notice Served: 11/16/2023
Title: District Manager	Email: steven.cassulo@wasteconnections.com	Phone No: <input checked="" type="checkbox"/> 909-396-2179	Email: gvergara@aqmd.gov	

*Key to Authority Abbreviations:

SCAQMD – South Coast Air Quality Management District
CCR – California Code of Regulations

CH&SC – California Health and Safety Code
CFR – Code of Federal Regulations

Method of Service:

☐ In Person ☐ Certified Mail ☒ Electronic Mail

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During a hearing for a variance, you may be represented either by yourself or by your attorney or consultant. You will have the opportunity to present evidence and testimony, and to cross-examine any SCAQMD witness.

If you fail to comply with any order of the Hearing Board, you may be subject to additional civil or criminal penalties set forth in California Health & Safety Code §§ 42400 *et seq.* and 42402 *et seq.*

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public nuisance involving injury or property damage.

If your case is handled by this program, you will receive a letter or phone call from an investigator in the SCAQMD General Counsel's office offering to settle your violation. Settlement terms usually call for a penalty payment and written proof of current compliance. The investigator's name and telephone number are included in the initial settlement letter in the event you would like to discuss the case.

Be prepared to describe any facts about the violation that you believe SCAQMD should know in considering your case. Sharing your knowledge of the facts, possible causes for the violation and plans to avoid future violations will help the investigator arrive at an appropriate disposition. **Be sure to respond by the date indicated in the letter to avoid further legal action.**

If the Minor Source Penalty Assessment Program fails to result in a settlement, your Notice of Violation may be referred to an SCAQMD attorney and handled under the procedures for Civil Prosecution or resolved through a Small Claims Court.

- **Civil Prosecution**

If your case is handled as a civil matter, it will be reviewed by an attorney from the SCAQMD General Counsel's office, who will typically make first contact with you through a letter that asks for information about your case. If the allegations in the Notice of Violation cannot be informally resolved, the SCAQMD is authorized to file a civil lawsuit in court to recover civil penalties. In cases involving serious harm or danger, however, SCAQMD may immediately commence a legal action for civil penalties and a court-ordered injunction. A **mandatory injunction** is a court order compelling a person and/or company to take specific action. A **prohibitory injunction** is a court order compelling a person and/or company to refrain from taking a specific action. Injunctions, which may even lead to shutting down a business, may be sought by SCAQMD to prevent continuing or serious violations or damages from occurring.

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Available Resources

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General Information:		
SCAQMD Headquarters General Number (909) 396-2218	About SCAQMD Enforcement Authority	http://www.aqmd.gov/home/about http://www.aqmd.gov/home/about/authority/enforcement
General Counsel's Office (909) 396-3400	Compliance Notices	http://www.aqmd.gov/home/regulations/compliance/compliance-notices
	SCAQMD Rules	http://www.aqmd.gov/home/regulations/rules
Obtaining Permit or Billing Information:		
Small Business Assistance (800) 388-2121	Getting Permits	http://www.aqmd.gov/home/permits
Permit Information (909) 396-2468	Permit Forms	http://www.aqmd.gov/home/permits/permit-application-forms
(866) 888-8838	Permitting Fees	http://www.aqmd.gov/home/permits/fees
Billing Services (909) 396-2900		
Variances:		
Clerk of the Hearing Board (909) 396-2500	The Hearing Board	http://www.aqmd.gov/home/about/hearing-board

Attachment D

Los Angeles Regional Water Quality Control Board

November 22, 2023

Steve Cassulo, District Manager
Waste Connections, Inc.
Chiquita Canyon landfill
29201 Henry Mayo Drive
Castaic, California 91384
Steven.Cassulo@WasteConnections.com

Certified Mail
Return Receipt Requested
Claim No. 7010 3090 0002 1022 1714

NOTICE OF VIOLATION OF WASTE DISCHARGE REQUIREMENTS – CHIQUITA CANYON LANDFILL, CASTAIC, CALIFORNIA (FILE NO. 67-020, ORDER NO. R4-2018-0172, GEOTRACKER GLOBAL ID. L10003464243)

Dear Steve Cassulo:

The Los Angeles Regional Water Quality Control Board (Los Angeles Water Board) is the public agency with primary responsibility for the protection of ground and surface water quality within major portions of Los Angeles and Ventura Counties. The Los Angeles Water Board hereby issues this notice of violation (NOV) to Waste Connections, Inc. (Discharger), which operates the Chiquita Canyon Landfill (Landfill), a Class III municipal solid waste landfill located at 29201 Henry Mayo Drive, Castaic, California.

The Landfill is regulated under waste discharge requirements (WDRs) Order No. R4-2018-0172, including a Monitoring and Reporting Program (MRP, CI 6231), adopted by the Los Angeles Water Board on December 13, 2018, for the discharge of municipal solid wastes. The WDRs include requirements for construction and operations activities at the Landfill to protect groundwater and surface water resources of the State.

On October 3, 2023, during an inspection of the Landfill following a complaint by the Los Angeles County (LAC) Local Enforcement Agency (LEA), Los Angeles Water Board staff observed a leachate seep in the north-western portion of Main Canyon of the Landfill that flowed from the edge of the Landfill to a concrete V-ditch. The V-ditch widens to a flat bottomed ditch on its course to the stormwater debris basin at the front of the Landfill. The Landfill Operator placed several soil berms along the flat-bottomed ditch to capture and pump off the leachate before it reached the debris basin. Observations made during the inspection are documented in the enclosed inspection report. During a joint site visit conducted by multiple regulatory agencies on November 2, 2023, the Los Angeles Water Board staff observed that the above mentioned leachate seep was still occurring.

NORMA CAMACHO, CHAIR | SUSANA ARREDONDO, EXECUTIVE OFFICER

You are hereby notified that, based on the observations documented in the inspection report and information included in the LAC LEA complaint, the Discharger is in violation of the following requirements and provisions of the WDRs:

1. Section F.6 of the WDRs requires that *“Leachate and landfill-gas condensate containment systems shall be protected and maintained continuously to ensure their effectiveness and to prevent commingling of leachate and gas condensate with surface water run-on and run-off.”* The current conditions in the area of the leachate seep at the Landfill are not adequate to prevent the commingling of leachate and gas condensate with surface water run-on and run-off during a rain event.

2. Section B.3.a of the MRP requires that *“The Discharger shall, within 24 hours of discovery, report to Regional Board staff by telephone or email any previously unreported seepage from the Landfill. A written report shall be filed with the Regional Board pursuant to electronic submittal of information (ESI) reporting requirements within seven days, and contain at least the following information: i. Map - A map showing the location(s) of seepage. ii. Flow rate- An estimate of the flow rate. iii. Description - A description of the nature of the discharge (e.g., all pertinent observations and analyses). iv. Location - Location of sample(s) collected for laboratory analysis, as appropriate. v. Corrective measures - approved (or proposed for consideration) by the Regional Board Executive Officer.”* The Landfill Operator failed to report the leachate seep observed at the Landfill during the inspection to the Los Angeles Water Board as required in the WDRs.

You are directed to immediately correct the above cited violations of the WDRs. By **December 22, 2023**, the Discharger shall submit a written response to the Los Angeles Water Board to report all corrective actions that have been taken and actions that are planned to mitigate conditions of the Landfill that are in violation of the WDRs. No later than **February 20, 2024**, the Discharger shall submit a final report to the Los Angeles Water Board to demonstrate that the Landfill complies with the WDRs.

Compliance with the terms of the MRP included in the WDRs is required by California Water Code (CWC) section 13267. Pursuant to CWC section 13268, a person's failure to furnish technical or monitoring program reports as required may be subject to administrative civil liability of up to \$1,000 for each day a report is missing after the required deadline. For violations of the WDRs, pursuant to the California Water Code section 13350(e), you are subject to penalties of up to \$5,000 for each day in which the violations occur or \$10 for each gallon of waste discharged, but not both. These administrative civil liabilities may be assessed by the Los Angeles Water Board beginning with the date that the violations first occurred and without further warning. Please note that this Notice shall not be deemed to relieve you of liability for any violations that may have already occurred. The Los Angeles Water Board reserves the right to take any further enforcement action authorized by law, including referring this matter to the Attorney General's Office.

If you have any questions, please contact Mr. Douglas Cross (Project Manager) at (213) 620-2246 or douglas.cross@waterboards.ca.gov, or Dr. Wen Yang, Supervisor of the Land Disposal Unit, at (213) 620-2253 or wen.yang@waterboards.ca.gov.

Sincerely,

Hugh Marley
Assistant Executive Officer

Enclosure:

Los Angeles Water Board Inspection Report, October 3, 2023

CC:

Shikari Nakagawa-Ota, Los Angeles County (LAC), Environmental Protection Branch
(sota@ph.lacounty.gov)
Dorcus Hanson-Lugo, Los Angeles County (LAC) Department of Public Health
(dlugo@ph.lacounty.gov)
Karen Gork, Los Angeles County (LAC) Department of Public Health
(kgork@ph.lacounty.gov)
Karlo Manalo, Los Angeles County Public Works (kmanalo@dpw.lacounty.gov)
Ramon Herman, Los Angeles County Public Works (RHerman@dpw.lacounty.gov)
Wes Mindermann, California Department of Resources Recycling and Recovery
(CalRecycle) (Wes.Mindermann@CalRecycle.ca.gov)
Janelle Heinzler, California Department of Resources Recycling and Recovery
(CalRecycle) (Janelle.Heinzler@calrecycle.ca.gov)
Jeff Lindberg, California Air Resources Board (ARB) (Jeff.Lindberg@arb.ca.gov)
Vanessa Aguila, California Air Resources Board (ARB) (Vanessa.Aguila@arb.ca.gov)
Jack Cheng, South Coast Air Quality Management District (AQMD)
(Jcheng@aqmd.gov)
Larry Israel, South Coast Air Quality Management District (AQMD)
(lisrael@aqmd.gov)
Lynne Plambeck, Scope (Lynne@scope.org)
Abigail DeSesa (abigaildesesa@sbcglobal.net)

Attachment E

Chiquita Canyon Landfill (Facility ID: 119219)
Case No. 6177-4 Stipulated Order for Abatement (effective Sept. 6, 2023, ending Sept. 6, 2024)
Action Items for South Coast Air Quality Management District

Condition No.	Key Action	Start Date/ Deadline Date	Completion Status/Date Submitted
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COMPLETED

1(a)	Contract with a trained third party to conduct odor surveillance	10/6/2023	Completed
1(f)	Designate an employee able to receive notifications related to odor surveillance results	9/7/2023	Completed
12, 12(a)	Form the DMS Committee	10/6/2023	Completed
12	Provide DMS Committee member information to South Coast AQMD	10/6/2023	Completed
13	Connect 18 vertical dual extraction wells to the LFG system	9/15/2023	Completed
16	Submit permit modification application for LFG system	10/6/2023	Completed
19	Submit permit modification application for LFG condensate and leachate collection/storage system	10/6/2023	Completed
25	Submit completed design for the geosynthetic cover	9/12/2023	Completed
32	Install, maintain, and operate 1,000 feet or more of Semi-Permanent Vapor Odor Control in the Reaction Area	9/20/2023	Completed
12(d)	Submit report on initial flux chamber study	10/31/2023	Completed
21	Submit permit application for Flare 4	10/31/2023	Completed
25	Notify SCAQMD on progress of procuring and installing cover	10/31/2023	Completed
31	Obtain and install onsite MET station in the Reaction Area	10/31/2023	Completed
69	Detailed information on potential DMS treatment system	10/31/2023	Completed
17	Identify LFG wells with worst liquid impaction issues in the Reaction Area	11/3/2023	Completed
12(b)(iv)	Submit report on landfill best management practices	11/6/2023	Completed
20	Install and operate Flare 3; notify South Coast AQMD	11/24/2023	Completed: installed 11/15; notified 11/17/23

Ongoing Actions

1	Conduct odor surveillance	9/7/2023; ongoing	Ongoing
1(e)	Maintain odor surveillance log	9/7/2023; ongoing	Ongoing
1(f)	Review and modify odor mitigation measures based on odor surveillance results, as appropriate	9/7/2023; ongoing	Ongoing
2	Log odor surveillance notifications and actions taken in response	As needed	Ongoing
3	Expedite replacement of granular activated carbon media in LFG treatment system	9/7/2023; ongoing	Ongoing; see Condition 8 monthly reports

Condition No.	Key Action	Start Date/ Deadline Date	Completion Status/Date Submitted
3	Ensure adequate stock of all odor control products and supplies are maintained on site	9/7/2023; ongoing	Ongoing
4	Prioritize Flare 2 over Flare 1	9/7/2023; ongoing	Ongoing
5	Sample LFG sulfur compounds combusted using colorimetric tests for H2S	9/7/2023; ongoing	Ongoing
5	Sample LFG sulfur compounds for total sulfur compounds as H2S using South Coast AQMD Method 307-91	9/7/2023; ongoing	Ongoing
5(a)	Record South Coast AQMD Method 307-91 analysis	9/7/2023; ongoing	Ongoing
5(b)	Report sulfur compound readings and analysis to South Coast AQMD	9/7/2023; ongoing	Ongoing; see Condition 8 monthly reports
6	Maintain adequate stock of appropriately ranged colorimetric tubes	9/7/2023; ongoing	Ongoing
7	Maintain record of LFG information	9/7/2023; ongoing	Ongoing; see Condition 8 monthly reports
8	Submit monthly written report to South Coast AQMD	9/30/2023; monthly	Ongoing; submitted on 9/30/23, 10/16/23, 11/20/23
9	Conduct integrated landfill surface sampling	9/20/2023; ongoing	Ongoing
9(b)	Review and revise Reaction Area	10/6/2023	Ongoing
9(a)	Submit revised Reaction Area map and related documentation to South Coast AQMD	10/6/2023; monthly	Ongoing; submitted on 10/06/23, 11/06/23
10	Conduct instantaneous landfill surface monitoring	9/13/2023; ongoing	Ongoing
11	Continue operating flares and landfill gas treatment system	9/7/2023; ongoing	Ongoing
11	Include deviation reporting on emissions limits exceedances in semi-annual Title V reports	9/7/2023; ongoing	Ongoing
12(c)	Post all expert reports on Odor Mitigation webpage	Upon submission of export reports	Ongoing
13	Expand gas well system	9/7/2023; ongoing	Ongoing
14	Address wells with temps above 170 degrees Fahrenheit	9/7/2023; ongoing	Ongoing
14	Monitor each LFG system well at least monthly	9/7/2023; ongoing	Ongoing
14	Continue to operate all gas wells (as needed)	9/7/2023; ongoing	Ongoing
15	Add vertical dual extraction wells (as needed)	9/7/2023; ongoing	Ongoing
15	Expand well-field (as needed)	10/31/2023; ongoing	Ongoing; see Condition 8 monthly reports
17, 17(a)	Expediently dewater wells	11/5/2023; ongoing	Ongoing; see Condition 8 monthly reports
22	Continue using portable thermal oxidizer until DMS Committee concludes it is no longer needed; notify South Coast AQMD	9/7/2023; ongoing	Ongoing
23	Continue using Flare 1 and 2 until Flare 4 is permitted and operational.	9/7/2023; ongoing	Ongoing
24	Visually inspect landfill cover around the Reaction Area; repair landfill cover Issues as needed; maintain log of cover repairs	9/7/2023; ongoing	Ongoing; see Condition 8 monthly reports

Condition No.	Key Action	Start Date/ Deadline Date	Completion Status/Date Submitted
25	Notify South Coast AQMD on progress of procuring and installing cover	10/31/23; ongoing	Ongoing; see Condition 8 monthly reports
27	Expand and enhance current ambient air monitoring program pursuant to DPH's direction.	9/7/2023; ongoing	Ongoing
27	Submit ambient air monitoring reports for DPH to South Coast AQMD	As needed	Ongoing
28	Maintain Odor Mitigation webpage; update weekly	9/7/2023; ongoing	Ongoing
28	Translate Odor Mitigation webpage and reports into Spanish	10/6/2023; ongoing	Ongoing
29	Host community information meetings.	9/14/2023; monthly based on receipt of NOV's	Ongoing
30	Maintain fresh trash odor mitigation measures during Unfavorable Wind Conditions	9/7/2023; ongoing	Ongoing
30(e)	Train staff on fresh trash odor mitigation measures to use during Unfavorable Wind Conditions	9/7/2023; ongoing	Ongoing
31	Maintain onsite MET station in the Reaction Area	10/31/2023; ongoing	Ongoing
33, 34	Operate and maintain a landfill perimeter odor control misting system	9/7/2023; ongoing	Ongoing
4	Once in use, prioritize Flare 2 and 3 over Flare 1	Upon operation of Flare No. 3	Ongoing
25	Install geosynthetic cover over western portions of Module 2B/3/4 Phase 2, Module 2B/3, and Module 4	TBD	In progress

Future Actions

12(b)(iii)	Submit report on feasibility of continuous community emission monitoring system	12/1/2023	In progress
26, 26(a)	Submit report on air dispersion modeling	12/1/2023	In progress
18	Submit proposed Reaction Area dewatering guidelines	12/5/2023	
12(b)(ii)	Submit report on investigation on landfill reaction cause and solutions to slow the reaction	12/8/2023	
12(b)(iii)	Submit workplan for installation of continuous monitoring	12/31/2023	
12(d)	Submit proposal for second flux chamber study	12/31/2023	
12(b)(v)	Submit report on health risks of DMS	1/15/2024	
26(b)	Submit proposal for additional air modeling study	1/15/2024	
12(b)(i)	Submit report on study of treatment of DMS and preventative mechanisms for DMS formation	4/30/2024	
12(d)	Conduct second flux chamber study	TBD	
12(d)	Submit report on second flux chamber study	TBD	
18	Implement proposed Reaction Area dewatering guidelines and implementation procedures	TBD	
26(b)(ii)	Complete additional air modeling study (if recommended) and submit final written report	TBD	