



# CHIQUITA CANYON

*A Waste Connections Company*

December 29, 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 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-Third 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 November 2023. This letter serves as Chiquita's thirty-third monthly update.

On December 2, 2021, the County of Los Angeles 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 last monthly update 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 six 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 December 6 to 27, 2023. Copies of these NOVs are enclosed in Attachment A.

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. Detailed information on Chiquita's implementation of the Stipulated Order can be found in the chart enclosed as Attachment B.

On November 21, 2023, Chiquita received a letter from the Los Angeles County Department of Public Health acting as the Local Enforcement Agency ("LEA"). The LEA's letter requires Chiquita to implement four CalRecycle-recommended mitigation measures. Chiquita is discussing several of these mitigation measures with the LEA, but has begun implementing the mitigation measures in accordance with the LEA's letter and subsequent correspondence with the LEA. Detailed information on Chiquita's implementation of the CalRecycle-recommended mitigation measures can be found in the chart enclosed as Attachment C.

### **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 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 through October 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 Odor Mitigation website, here:  
<https://chiquitacanyon.com/reports/odor-mitigation/>.

On September 6, 2023, Chiquita entered into a Stipulated Order for Abatement with the SCAQMD to address the SCAQMD Rule 402 NOVs 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 on Chiquita's Odor Mitigation website, and in the chart provided in Attachment B.

### **Leachate-Related NOVs**

While Chiquita did not receive any leachate-related NOVs since the last monthly update, Chiquita continues to implement the leachate-related mitigation measures described in more detail in Chiquita's November 8, 2023 and December 1, 2023 update letters to address the previously issued leachate-related NOVs. More information on Chiquita's efforts to address leachate seeps can be found in Chiquita's December 22, 2023 formal written response to the Los Angeles Regional Water Quality Control Board's November 22 NOV, which is posted on Chiquita's Odor Mitigation website.

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 – Chart of Chiquita's Implementation of the Stipulated Order for Abatement  
C – Chart of Chiquita's Implementation of the LEA's Mitigation Measures

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

# Attachment A



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

P 78427

# NOTICE OF VIOLATION

DATE OF VIOLATION		
Month: 12	Day: 06	Year: 23

Facility Name: CHIQUITA 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.

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	402			For discharging such quantities of air contaminants to cause injury, 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 Cassulo	Phone: 661 371 9214	Served By: Arely Gil Rojas	Date Notice Served: 12/06/23
Title: District Manager	Email: steve.cassulo@wastecollections.com	Phone No: <input checked="" type="checkbox"/> 909-396-2183 <input type="checkbox"/> 310-233-	Email: arojas@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 checked="" type="checkbox"/> In Person <input type="checkbox"/> Certified Mail
--	--	--





# NOTICE OF VIOLATION

DATE OF VIOLATION		
Month:	Day:	Year:
12	07	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	RULE 402		_____	FOR DISCHARGING SUCH QUANTITIES OF AIR CONTAMINANTS TO CAUSE INJURY, DETRIMENT NUISANCE OR ANNOYANCE TO A CONSIDERABLE
2	<input type="checkbox"/> SCAQMD <input checked="" type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	CH&SC 41700		_____	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: HUGO CAMPOS	Date Notice Served: 12/07/2023
Title: DISTRICT MANAGER	Email: steve.c@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





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

P 80605

# NOTICE OF VIOLATION

DATE OF VIOLATION		
Month:	Day:	Year:
12	12	2023

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

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	<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 checked="" type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	<i>4170D</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>661 371-9214</i>	Served By: <i>Karen Woullard</i>	Date Notice Served: <i>12/12/2023</i>
Title: <i>District Manager</i>	Email: <i>Steven.Cassulo@wasteconnections.com</i>	Phone No: <input checked="" type="checkbox"/> 909-396-2225 <input type="checkbox"/> 310-233-	Email: <i>Kwoullard @ 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 78325

# NOTICE OF VIOLATION

DATE OF VIOLATION		
Month:	Day:	Year:
12	18	23

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.

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	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: Niyati Rami	Date Notice Served: 12/18/23
Title: District Manager	Email: steve.cassulo@wasterconnections.com	Phone No: <input checked="" type="checkbox"/> 909-396-2249 <input type="checkbox"/> 310-233-	Email: nrami@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 checked="" type="checkbox"/> In Person <input type="checkbox"/> Certified Mail
--	--	--

VIOLATOR'S COPY





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

P 77667

# NOTICE OF VIOLATION

DATE OF VIOLATION		
Month:	Day:	Year:
12	22	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	RULE 402		_____	FOR DISCHARGING SUCH QUANTITIES OF AIR CONTAMINANTS TO CAUSE INJURY, DETRIMENT 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 CASSULO	Phone:	661-371-9214	Served By:	HUGO CAMPOS	Date Notice Served:	12/22/2023
Title:	DISTRICT MANAGER	Email:	steve.ca@wasteconnections.com	Phone No:	<input checked="" type="checkbox"/> 909-396-2110 <input type="checkbox"/> 310-233-	Email:	hcampes@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 79653

# NOTICE OF VIOLATION

DATE OF VIOLATION		
Month:	Day:	Year:
12	27	23

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.

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	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 Cassulo		Phone: 661.371.9214	Served By: Evan Landi	Date Notice Served: 12/27/23
Title: District Manager	Email: Steve.ca@wasteconnections.com	Phone No: <input checked="" type="checkbox"/> 909-396-2306 <input type="checkbox"/> 310-233-	Email: elandi@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

**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
<b>COMPLETED</b>			
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
12(b)(iii)	Submit report on feasibility of continuous community emission monitoring system	12/1/2023	Completed



Condition No.	Key Action	Start Date/ Deadline Date	Completion Status/Date Submitted
26, 26(a)	Submit report on air dispersion modeling	12/1/2023	Completed
18	Submit proposed Reaction Area dewatering guidelines	12/5/2023	Completed
12(b)(ii)	Submit report on investigation on landfill reaction cause and solutions to slow the reaction	12/8/2023	Completed

#### 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
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 H <sub>2</sub> S	9/7/2023; ongoing	Ongoing
5	Sample LFG sulfur compounds for total sulfur compounds as H <sub>2</sub> S 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, 12/18/23
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 10/6/23, 11/6/23, 12/6/23

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



Condition No.	Key Action	Start Date/ Deadline Date	Completion Status/Date Submitted
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
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	Ongoing
25	Install geosynthetic cover over western portions of Module 2B/3/4 Phase 2, Module 2B/3, and Module 4	TBD	In progress; see Condition 8 monthly reports

#### Future Actions

12(b)(iii)	If continuous monitoring is determined to be feasible by the December 1, 2023 investigation and report, 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	

## Attachment C

### LEA Mitigation Measures

Mitigation Measure #	Key Action	Start Date/Deadline	Status
1A	Develop a soil reaction break/barrier plan and a set of criteria that would require Chiquita to install a soil reaction break/barrier between the reaction and operational areas of the landfill.	No later than 2 weeks after installing temperature monitoring devices pursuant to Mitigation Measure #1B.	In progress
1B	Install temperature monitoring devices in the reaction area.	See <a href="#">Chiquita's December 20, 2023 temperature monitoring plan</a> for installation schedule	In progress
2A	Install 30-mil geosynthetic cover over the Reaction Settlement Area and any well showing signs of a reaction.	See <a href="#">Chiquita's December 19, 2023 cover plan</a> for installation schedule	In progress
2B	Develop a written plan for documenting and tracking issues in the soil cover for LEA review and approval.	December 6, 2023	Completed
2B	Revise written plan for documenting and tracking issues in the soil cover to include documenting and tracking issues related to the geosynthetic cover and actions taken to address any identified issues.	December 21, 2023	Completed
2B	Upon LEA approval of the written plan, submit a weekly report to the LEA by each Tuesday.	Upon LEA approval of the written plan	Awaiting LEA approval of the written plan
3	Submit a work plan for a slope stability analysis in the area of the western slope of the reaction area with a timeline for LEA review and approval.	December 14, 2023	Completed
3	Perform a slope stability analysis in the area of the western slope of the reaction area.	TBD based on LEA approval of the work plan	Awaiting LEA approval of the work plan
4	Collect temperatures in and around the reaction area to meet the manufacturer's temperature design specifications/recommendations of equipment in the area.	See Mitigation Measure #1B.	See Mitigation Measure #1B.