



# CHIQUITA CANYON

*A Waste Connections Company*

December 28, 2023

***Via E-Mail***

Mr. David Nguyen  
Los Angeles County Public Works  
900 S. Fremont Avenue  
Alhambra, CA 91803  
[dnguyen@pw.lacounty.gov](mailto:dnguyen@pw.lacounty.gov)

**Re: Chiquita Canyon Landfill – Fifth Supplemental CUP Condition No. 69 Report**

Dear Mr. Nguyen:

Condition 69 of Chiquita Canyon, LLC's ("Chiquita") Conditional Use Permit ("CUP") requires that, upon receiving four Notices of Violation ("NOVs") related to air quality in a given calendar year, Chiquita must submit a report to Los Angeles County Public Works ("PW") within 30 days after the fourth NOV, explaining the NOV and the steps taken to address it. Chiquita must also provide such a report within 30 days of receiving any additional air quality related NOVs within the same calendar year.

The South Coast Air Quality Management District ("South Coast AQMD") issued Chiquita NOVs for violations of South Coast AQMD Rule 402 and California Health & Safety Code § 41700, triggering Chiquita's obligation to provide a report under CUP Condition 69, which Chiquita submitted on July 27, 2023. Chiquita submitted supplemental reports on August 23, September 22, October 24, and November 22, 2023. Since the submission of the November 22 report, South Coast AQMD issued Chiquita nine additional Rule 402 NOVs for violations alleged to have occurred in November and December 2023. These NOVs are provided at Attachment A.<sup>1</sup>

On November 22, 2023, Chiquita received an NOV from the Los Angeles Regional Water Quality Control Board ("Water Board") for alleged violations of section F.6 of Chiquita's Waste

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<sup>1</sup> The NOV numbers and dates of the alleged violations are as follows: NOV P80602 (November 28, 2023), NOV P75990 (November 29, 2023), NOV P77665 (November 30, 2023), NOV P78427 (December 6, 2023), NOV P77666 (December 7, 2023), NOV P80605 (December 12, 2023), NOV P78325 (December 18, 2023), NOV P77667 (December 22, 2023), and NOV P79653 (December 27, 2023).

Discharge Requirements (“WDRs”), Order No. R4-2018-0172, and section B.3.a of Chiquita’s Monitoring and Reporting Program (“MRP”). A copy of this NOV is provided at Attachment B.

### **South Coast AQMD Rule 402 NOVs – Explanation and Corrective Action**

A discussion of each South Coast AQMD Rule 402 NOV, along with corrective action taken by Chiquita in response to these NOVs, is provided below.

#### **Explanation**

Each of the Rule 402 NOVs issued by South Coast AQMD made identical allegations. Each NOV was issued after a South Coast AQMD inspector verified complaints about odors alleged to be coming from the Chiquita Canyon Landfill (“Landfill”). These NOVs were substantively the same as prior NOVs issued by South Coast AQMD that were addressed in Chiquita’s prior Condition 69 reports. The source of the odors is the same as described in those reports: an increase in the production of landfill gas and liquids caused by an abnormal reaction taking place within an older portion of the Landfill waste mass.

#### **Corrective Action**

Chiquita provided detailed descriptions of corrective actions taken to mitigate the reaction and any odors emanating from the Landfill in the prior Condition 69 reports. While Chiquita does not repeat information provided in the earlier reports in this report, it continues to take all actions listed in those reports. The corrective action described in this section includes only new measures taken since the last update.

South Coast AQMD Stipulated Order for Abatement: Under the South Coast AQMD Stipulated Order, Chiquita has implemented the following additional mitigation measures since the November 22 report:

- On December 1, Chiquita submitted a report on air dispersion modeling and a study to determine odor and emission transport of odors from the Landfill to South Coast AQMD. A copy of this expert report is available on Chiquita’s Odor Mitigation website (<https://chiquitacanyon.com/reports/odor-mitigation/>).
- On December 1, Chiquita submitted a report on the feasibility and availability of a continuous community emission monitoring system for DMS to South Coast AQMD. A copy of this expert report is available on Chiquita’s website.
- On December 5, Chiquita submitted dewatering guidelines to South Coast AQMD. A copy of these guidelines is available on Chiquita’s website.



- On December 8, Chiquita submitted a report on the cause(s) of the landfill reaction and solutions to slow and stop the reaction to South Coast AQMD. A copy of this expert report is available on Chiquita's website.
- Chiquita is continuing to expand the landfill gas well system as needed. Since July 2023, Chiquita has installed 59 vertical extraction wells and is continuing to evaluate and install additional wells as needed.
- Chiquita is continuing to expand its liquids extraction and collection capabilities. Since the Stipulated Order went into effect, Chiquita has installed 41 dewatering pumps in its vertical extraction wells, including wells with the worst liquid impaction issues as determined by the DMS Committee, and is continuing to expeditiously order and install additional dewatering pumps.
- Chiquita is working to procure and install the geosynthetic cover that will cover western portions of the Reaction Area to limit the migration of landfill gas from the site. Chiquita submits status updates on this project in its Condition 8 monthly reports to South Coast AQMD. These monthly reports are posted on Chiquita's website. In the shorter term, until this cover is in place, Chiquita has installed a temporary cover (scrim) over a portion of this area to assist in controlling odors.

More detailed information on Chiquita's implementation of and compliance with the Stipulated Order is available on Chiquita's website and in Chiquita's monthly reports to South Coast AQMD, which are available on Chiquita's website.

Implementing CalRecycle's recommendations: As described in the November 22 report, Chiquita has begun implementing many of the CalRecycle-recommended mitigation measures described in the Local Enforcement Agency's ("LEA") October 17 letter. Since the November 22 report, Chiquita has implemented the following additional mitigation measures in accordance with the LEA's October 17 letter:

- Chiquita has begun installing well boots seals on all wells in the Reaction Area.
- Chiquita is measuring leachate temperature at the tanks at the liner level and at all sumps on a monthly basis.
- Chiquita is sampling leachate for benzene and other volatile organic compounds on a quarterly basis.
- Chiquita has obtained a drone with sensors that allow for GPS, methane, and instantaneous surface monitoring, and is utilizing it on a biweekly basis, weather permitting.
- Chiquita has added carbon monoxide concentration data to its monthly reporting to South Coast AQMD under Condition 8.

On November 21, 2023, Chiquita received a second letter from the LEA, requiring Chiquita to implement four additional CalRecycle-recommended mitigation measures. Chiquita is discussing some of these additional mitigation measures with the LEA. Chiquita has implemented the following additional mitigation measures in accordance with the LEA's November 21 letter:

- Chiquita prepared a written plan for documenting and tracking fissures, settlement, and tension cracks in the soil cover and submitted it to the LEA for review and approval on December 6. In response to a December 14 letter from the LEA, Chiquita revised this plan to include documentation and tracking of issues with the geosynthetic cover discussed two bullet points below, and to include actions taken to address issues with the geosynthetic cover and soil cover. Chiquita submitted this revised written plan to the LEA for review and approval on December 21. Once the LEA has approved this plan, Chiquita will begin tracking cover issues in accordance with the plan and submitting weekly reports to the LEA.
- Chiquita prepared a slope stability analysis work plan and submitted it to the LEA for review and approval on December 14.
- Chiquita prepared a plan to cover with geosynthetic material the reaction settlement area and any wells exhibiting temperatures above 160°F or carbon monoxide concentrations above 1,500 parts per million by volume. Chiquita submitted this cover plan to the LEA for review and approval on December 19. The LEA has conditionally approved this plan, and Chiquita will soon begin the preparatory work required to install this geosynthetic cover.
- On December 20, Chiquita submitted to the LEA a plan for the installation of temperature monitoring devices. The LEA has conditionally approved this plan, and Chiquita is beginning to procure the devices and necessary equipment.
- Chiquita is preparing a soil reaction break/barrier plan and proposing a set of criteria that would require Chiquita to install a soil reaction break/barrier between the reaction and operational areas of the Landfill.

Distributing air filtration devices to local residents: As described in the August 23 report, Chiquita is continuing to provide in-home air filtration devices upon request to those community members closest to the Landfill and affected by odors. Chiquita is also distributing replacement air filters for the devices. Residents who live in communities surrounding the Landfill may pick up replacement air filters at the Castaic Library during normal business hours. More information on this program can be found on Chiquita's website.

Enhanced community air monitoring program: As described in prior reports, at the direction of the Los Angeles County Department of Public Health ("DPH"), Chiquita has enhanced its current air monitoring program. Data and reports can be found on Chiquita's website. The data for October 2023 was submitted to DPH on November 21. Toxicologists from the Center for Toxicology and Environmental Health ("CTEH") reviewed the August through October data and



prepared an analysis that is available on Chiquita's website. The data for November 2023 was submitted to DPH on December 21. The toxicologists will review and analyze this data.

### **Leachate NOVs – Explanation and Corrective Action**

A discussion of the Water Board NOV, along with corrective action taken by Chiquita in response to the recent leachate-related NOVs, is provided below.

#### **Explanation**

Chiquita previously received several NOVs related to leachate seeps and the work Chiquita is performing to address the leachate seeps. Since the November 22 report, Chiquita also received an NOV from the Water Board alleging violations of section F.6 of Chiquita's WDRs, Order No. R4-2018-0172, which requires Chiquita to maintain its leachate and condensate containment system to prevent commingling of leachate and condensate with surface water, and section B.3.a of Chiquita's MRP, which requires Chiquita to report leachate seeps to the Water Board.

As required by section F.6 of the WDRs, Chiquita has protected and continuously maintained its leachate and landfill-gas condensate containment systems. There was no breakdown or failure of the existing leachate containment structures, and the cover and liner were designed in accordance with applicable state and local regulations. Further, there was no commingling of leachate and condensate with surface water. The Landfill has been experiencing an unusually large increase in leachate production for its geographical location, which the Landfill was not designed to handle, nor required to be designed to handle.

#### **Corrective Action**

Chiquita has implemented a variety of corrective measures to address the leachate seeps noted in the Water Board NOV and the prior leachate-related NOVs.

To address the seepage that reached the western and northern concrete-lined stormwater channels, Chiquita placed check dams in the channels to contain any leachate that reached the channels. If leachate reached the channels, vacuum trucks pumped the liquids out of the channels and transported the liquids to onsite storage tanks. No leachate reached the Landfill's onsite stormwater retention pond.

As wet weather conditions approached in November, and as described below, Chiquita redirected the liquids so that the leachate no longer entered the stormwater channels. Chiquita then cleaned the channels by removing solids, debris, and liquids impacted by leachate, and by pressure washing. Chiquita then removed the soil check dams, and stormwater flowed as originally intended into the stormwater pond.

For any leachate on the surface of the Landfill, Chiquita promptly scraped as much stained dirt as possible and re-covered the surface with clean dirt. For any leachate that reached the perimeter

Mr. David Nguyen  
Los Angeles County Public Works  
December 28, 2023  
Page 6 of 7

road, Chiquita removed any dirt that showed staining and disposed the dirt at the Landfill's working face.

To address the seep on the western slope of the reaction area, Chiquita conducted construction and repair work to 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. After completing this work, Chiquita covered the lower portion of the western slope with scrim to assist in controlling odors from the leachate seeps from the western slope. This scrim will remain in place until the geosynthetic cover required by the Stipulated Order can be installed.

To assist in preventing leachate and stormwater from mixing, Chiquita raised the perimeter road by three feet in the new sump area. This added height serves as another barrier to keep the leachate at the toe of the western slope, instead of flowing across the perimeter road into the stormwater channel. Chiquita also installed a stormwater control berm along the top of the scrim to direct stormwater around the scrim instead of allowing it to sheet flow over the scrim.

Chiquita is also continuing to increase the number of vertical wells and pumps in the reaction area. If the wells and pumps alone are insufficient to stop leachate from surfacing underneath the scrim at the western slope, Chiquita will reevaluate the need for additional drainage infrastructure.

To address the seep on the northern slope of the reaction area, Chiquita installed two sumps and additional horizontal drainage. Leachate is pumped from the sumps to tanks located on the northern slope. The northern slope also has a stormwater diversion berm that diverts any stormwater away from the area with leachate seeps to prevent commingling.

Moving forward, Chiquita is inspecting for leachate seeps on a daily basis. Chiquita will install additional sumps as necessary. Chiquita is also working to expand its plan to install a geosynthetic cover over portions of the reaction area. Chiquita has committed to installing the geosynthetic cover over an approximately 23.9-acre area on the top deck of the Landfill and on the northern slope. Chiquita is targeting Q1 2024 for the installation of this cover, but this timeline is dependent on weather and additional requirements from Chiquita's regulators.

Please contact me should you have any questions about this report.

Sincerely,



Steve Cassulo  
District Manager  
Chiquita Canyon, LLC

Mr. David Nguyen  
Los Angeles County Public Works  
December 28, 2023  
Page 7 of 7

Attachment: A – NOVs under Health & Safety Code § 41700 and South Coast AQMD Rule 402

B – Water Board NOV

cc: Karlo Manalo, Public Works  
Ai-Viet Huynh, Department of Regional Planning  
Alex Garcia, Department of Regional Planning  
Edgar De La Torre, Department of Regional Planning  
Eric Morofuji, Department of Public Health  
Mark Como, Department of Public Health

## Attachment A





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

P 80602

# NOTICE OF VIOLATION

DATE OF VIOLATION		
Month:	Day:	Year:
11	28	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>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>661 371-9214</i>	Served By: <i>Karen Woullard</i>	Date Notice Served: <i>11/28/2023</i>
Title: <i>District Manager</i>	Email: <i>Steven.cassulo@wasteconnections.com</i>	Phone No: <input checked="" type="checkbox"/> 909-396-2285 <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

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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: 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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2	<input type="checkbox"/> SCAQMD <input checked="" type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	CH 4175 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: 616-371-9214	Served By: Daniel Woo	Date Notice Served: 11/29/23
Title: District Manager	Email: steveca@wasteconnections.com	Phone No: <input checked="" type="checkbox"/> 909-396-2432 <input type="checkbox"/> 310-233-	Email: DWoo@aqmd.gov

\*Key to Authority Abbreviations:

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CFR – Code of Federal Regulations

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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: 91389	
Mailing Address: 29201 HENRY MAYO DRIVE	City: CASTAIC	Zip: 91389	

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	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

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CFR – Code of Federal Regulations

Method of Service:

☒ In Person

☐ Certified Mail

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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.

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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, 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
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# 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.

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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: stevec@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: <input checked="" type="checkbox"/> In Person <input type="checkbox"/> Certified Mail
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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>
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Mailing Address: <i>29201 Henry Mayo Drive</i>	City: <i>Castaic</i>	Zip: <i>91384</i>

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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
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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:	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





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

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## 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.

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