



April 1, 2024

Via E-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-Sixth 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 February 2024. This letter serves as Chiquita's thirty-sixth 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 eighteen 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 February 28 to March 29, 2024. Copies of these NOVs are provided in Attachment A.

- On March 15, 2024, Chiquita received a Site Inspection Report from the Local Enforcement Agency (“LEA”) related to a February 7, 2024 inspection. The Site Inspection Report alleges violations of 27 CCR 20921 (Gas Monitoring and Control) and 27 CCR 20750 (Site Maintenance). This Site Inspection Report is provided in Attachment B.
- On March 20, 2024, Chiquita received NOV P80868, dated December 6, 2023, from SCAQMD for alleged violations of SCAQMD Rule 42401 and Conditions 38, 39, and 42(a) of Chiquita’s Stipulated Order for Abatement with SCAQMD in Case No. 6177-4. This NOV is provided in Attachment C.
- On March 20, 2024, Chiquita received NOV P81010, dated January 18, 2024, from SCAQMD for alleged violations of SCAQMD Rules 3002 and 202. This NOV is provided in Attachment D.
- On March 28, 2024, Chiquita received an NOV from the Los Angeles Regional Water Quality Control Board (“Water Board”) for alleged violations of Industrial General Permit Sections III.A-C, V.A-B, VI.A-C, X.B.2, XI.B.6.g, X.E, X.F-G, X.G.e, X.H.1.e, X.H.2, X.I, and Attachment A.1. This NOV is provided in Attachment E.
- On March 29, 2024, Chiquita received a Summary of Violations (“SOV”) from the Department of Toxic Substances Control (“DTSC”), alleging violations of the California hazardous waste control laws and their implementing regulations. This SOV is provided in Attachment F.

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 provided in Attachment G. Detailed information on Chiquita’s implementation of the CalRecycle-recommended mitigation measures from the LEA’s November 21, 2023 letter can be found in the chart provided in Attachment H. Detailed information on Chiquita’s implementation of the U.S. Environmental Protection Agency’s (“EPA”) Unilateral Administrative Order (“UAO”) can be found in the chart provided in Attachment I.

On March 20, 2024, Chiquita received an Investigative Order from the Water Board, requiring Chiquita to submit additional information for an investigation of potential surface water and groundwater impacts from the landfill reaction. This Investigative Order is provided in Attachment J. Chiquita is in the process of reviewing and preparing a report in response to the Investigative Order.

June 2020 DRP NOV

Chiquita has reached a settlement agreement with the County of Los Angeles (the “County”), which includes terms affecting CUP 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 CUP 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 CUP Conditions 77 and 79. Chiquita has provided updates on the June 11, 2020 NOV and CUP 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 CUP 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 an older portion of the Landfill waste mass. 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 NOVs issued by SCAQMD inspectors as a result of the landfill reaction, alleging violations of SCAQMD Rule 402 and Health & Safety Code section 41700. On January 17, 2024, the SCAQMD Hearing Board approved a modified Stipulated Order to address SCAQMD NOVs alleging violations of Health & Safety Code section 41700 and SCAQMD Rules 402, 431.1, 3002, 203, and 1150 and issues related to alleged leachate seepage and other conditions related to the landfill reaction. On March 21, 2024, the SCAQMD Hearing Board approved a further modification to the Stipulated Order to address the recent change in composition of the Landfill’s leachate. The modified Stipulated Order contains over 29 new and modified conditions. A copy of this modified Stipulated Order will be provided once it is available to Chiquita.

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 G.

LEA Site Inspection Report

On March 15, 2024, Chiquita received a Site Inspection Report from the LEA that alleges violations of 27 CCR 20921 (Gas Monitoring and Control) for methane concentrations

fluctuating in and out of compliance (i.e., above 5% methane) at monitoring wells GP-13 and GP-15 and 27 CCR 20750 (Site Maintenance) for the alleged leachate outbreaks and stability issues with leachate saturated slope and waste, high temperatures, issues with landfill gas collection, excessive leachate production, and unusual and large-scale settlement, and requiring Chiquita to implement four mitigation measures recommended by CalRecycle (Mitigation Measure #s 1 through 4).

The methane exceedances are due to the increased production of landfill gas caused by the landfill reaction. When Chiquita is unable to collect all of the landfill gas produced, the landfill gas either moves up as surface emissions or moves laterally as subsurface migration.

To address these alleged violations, Chiquita has been installing new wells in and around the reaction area, tuning the new and existing wells, improving vacuum reliability for the soil vapor extraction wells by relocating the Zeeco portable thermal oxidizer to the upper portion of the Landfill and installing a new, larger inlet header to improve liquid management and flow stability, and performing daily inspections to maximize extraction, safety permitting. Chiquita is also conducting extensive, daily cover inspections and is repairing the cover as needed, safety permitting.

As described above, Chiquita continues to implement the four CalRecycle-recommended mitigation measures that were imposed by the LEA in its November 21, 2023 letter. More detailed information on Chiquita's implementation of the CalRecycle-recommended mitigation measures is available on Chiquita's website and in the chart provided in Attachment H.

SCAQMD NOV P80868

On March 20, 2024, Chiquita received NOV P80868, dated December 6, 2023, from SCAQMD for alleged violations of SCAQMD Rule 42401 and Conditions 38, 39, and 42(a) of Chiquita's Stipulated Order for Abatement with the SCAQMD in Case No. 6177-4. Specifically, the NOV alleged that Chiquita failed to have monthly leachate samples analyzed using EPA Method 624.1 for the presence of volatile organic compounds and toxic air contaminants and failed to post the sample results and submit a detailed description and depiction of the sampling locations within one week of receipt from the contract laboratory as required by Condition 38 of the Stipulated Order. The NOV also alleged that Chiquita failed to update its Odor Mitigation webpage with information for November 2023 through January 2024 in Spanish as required by Condition 39 of the Stipulated Order, and that Chiquita failed to notify SCAQMD at least two days prior to beginning excavation as required by Condition 42(a) of the Stipulated Order.

Documentation required by Condition 38 is posted on Chiquita's webpage. Pursuant to Condition 39, Chiquita submits all reports and information posted on Chiquita's website to a translation service once the reports and information are finalized. Chiquita then posts the translated reports and information on its Odor Mitigation website once the documents are translated. There is no deadline for these translations in Condition 39, and Chiquita is working diligently to ensure that all information is translated as required by the Stipulated Order. To

comply with Condition 42(a), Chiquita is submitting weekly notifications of potential excavation projects to SCAQMD.

SCAQMD NOV P81010

On March 20, 2024, Chiquita received NOV P81010, dated January 18, 2024, from SCAQMD for alleged violations of SCAQMD Rules 3002 and 202 and several of Chiquita's Permits to Operate. Specifically, this NOV alleges that Chiquita installed and operated a leachate treatment system, modified its landfill gas and condensate and leachate collection systems, and modified two of its landfill gas flares, all without first obtaining a Permit to Operate. The NOV also alleges that Chiquita modified and operated its third flare contrary to the description and conditions specified in the Permit to Construct.

Due to the substantially increased leachate production at the Landfill and the testing of some of the leachate above the regulatory limits for certain constituents, Chiquita was forced to quickly make significant changes to its leachate collection system. Much of this work has been done under the guidance and oversight of DTSC and the Multi-Agency Critical Action Team lead by the EPA. Chiquita has been discussing these needed permit modifications and applications with SCAQMD and, in accordance with the Stipulated Order as modified on March 21, 2024, is submitting applications for these new and modified permits on the timeline required by the Modified Stipulated Order.

Water Board NOV

On March 28, 2024, Chiquita received an NOV from the Water Board for alleged violations of Industrial General Permit Sections III.A-C, V.A-B, VI.A-C, X.B.2, XI.B.6.g, X.E, X.F-G, X.G.e, X.H.1.e, X.H.2, X.I, and Attachment A.1. Specifically, the NOV alleges that Chiquita has discharged effluent from the south detention basin in violation of its Industrial General Permit, failed to develop a complete stormwater pollution prevention plan, and failed to implement best management practices. Chiquita is in the process of reviewing this NOV and plans to discuss these alleged violations with the Water Board. Chiquita will provide more information on its actions taken in response to the NOV in future updates.

DTSC SOV

On March 29, 2024, Chiquita received an SOV from DTSC for alleged violations of California's hazardous waste control laws and their implementing regulations. Chiquita is in the process of implementing the compliance requirements listed in the SOV, which it will describe in more detail in its response to DTSC in April 2024.

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.

Integrated Waste Management Task Force
c/o Los Angeles County Public Works
April 1, 2024
Page 6 of 6

Regards,



Steve Cassulo
District Manager
Chiquita Canyon, LLC

Attachments: A – Rule 402 NOVs from SCAQMD
B – LEA Site Inspection Report
C – SCAQMD NOV P80868
D – SCAQMD NOV P81010
E – Water Board NOV
F – DTSC SOV
G – Chart of Chiquita's Implementation of the Stipulated Order for Abatement
H – Chart of Chiquita's Implementation of the LEA's Mitigation Measures
I – Chart of Chiquita's Implementation of the EPA UAO
J – Water Board Investigative Order

cc: David Nguyen, Public Works
Omid Mazdiyasni, Public Works

Attachment A



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

P 79606

NOTICE OF VIOLATION

DATE OF VIOLATION		
Month	Day	Year
02	28	2024

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 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		— — —	For discharging such quantities of air contaminants to cause injury, detriment nuisance or annoyance to 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:	Abriel Alberto	Date Notice Served:	02/28/2024
Title:	District Manager	Email:	Steve.c@wasteconnections.com	Phone No:	<input checked="" type="checkbox"/> 909-396-2318 <input type="checkbox"/> 310-233-	Email:	aalberto@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

ORIGINAL



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

P 79408

NOTICE OF VIOLATION

DATE OF VIOLATION		
Month	Day	Year
02	29	24

Facility Name CHIRQUITA CANYON LLC	Facility ID 119219	Section VB
Location Address 29201 HENRY MAYO DRIVE	City CASTAIC	Zip 91354
Mailing Address 29201 HENRY MAYO DRIVE	City CASTAIC	Zip 91354

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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 BILLY ANDRINO	Date Notice Served 02/29/24
Title DISTRICT MANAGER	Email steve.cassulo@wastecconnections.com	Phone No. <input checked="" type="checkbox"/> 809-396-2682 <input type="checkbox"/> 310-233-	Email bantoria @ aqmd.gov
*Key to Authority Abbreviations SCAQMD - South Coast Air Quality Management District CH&SC - California Health and Safety Code CCR - California Code of Regulations CFR - Code of Federal Regulations		Method of Service <input type="checkbox"/> In Person <input checked="" type="checkbox"/> Certified Mail	



NOTICE OF VIOLATION

DATE OF VIOLATION		
Month:	Day:	Year:
03	01	2024

Facility Name: Chiquita Canyon LLC		Facility ID#: 11921d	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, 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: Brian Chau	Date Notice Served: 03/01/2024
Title: District Manager	Email: stevecassulo@wastecollections.com	Phone No: <input checked="" type="checkbox"/> 909-396-3522 <input type="checkbox"/> 310-233-	Email: BCHAU@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

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VIOLATOR'S COPY



NOTICE OF VIOLATION

DATE OF VIOLATION		
Month:	Day:	Year:
03	04	2024

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

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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 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 Health & Safety Code 415700			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:	Christine Wang	Date Notice Served:	03/04/2024
Title:	District Manager	Email:	staveca@wasteconnections.com	Phone No:	<input checked="" type="checkbox"/> 909-396-2271 <input type="checkbox"/> 310-233-	Email:	chwang1@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



NOTICE OF VIOLATION

DATE OF VIOLATION		
Month:	Day:	Year:
03	05	2024

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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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	CA+HSC 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: 03/05/2024
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
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CH&SC - California Health and Safety Code
CFR - Code of Federal Regulations

Method of Service:

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

P 78045

NOTICE OF VIOLATION

DATE OF VIOLATION		
Month:	Day:	Year:
3	6	24

Facility Name: Chiquita Canyon Landfill	Facility ID: 119219	Section: VB
Location Address: 29201 Henry Mayo Road	City: Castaic	Zip: 91384
Mailing Address: 29201 Henry Mayo Road	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	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: Adam Martinez	Date Notice Served: 3/6/24
Title: District Manager	Email: Steven.Cassulo@wasteconnection.com	Phone No.: <input checked="" type="checkbox"/> 909-396-2431 <input type="checkbox"/> 310-233-	Email: amartinez2 @ 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 80208

NOTICE OF VIOLATION

DATE OF VIOLATION		
Month:	Day:	Year:
03	27	24

Facility Name: CHIKUITA 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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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 CARROLL		Phone: 661-794-7514	Served By: Jennifer Carlin	Date Notice Served: 03-07-24
Title: DISTRICT MANAGER	Email: STEVE.CARROLL@AQMD.GOV	Phone No: <input checked="" type="checkbox"/> 909-396-2020 <input type="checkbox"/> 310-233-	Email: jcarlin@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 81003

NOTICE OF VIOLATION

DATE OF VIOLATION		
Month	Day	Year
3	8	2024

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.

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 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>Steven Cusulo</i>		Phone: <i>661-371-9214</i>	Served By: <i>Gerardo Vergara</i>	Date Notice Served: <i>3/8/24</i>
Title: <i>District Manager</i>	Email: <i>steven.cusulo@wasteconnections.com</i>	Phone No: <input checked="" type="checkbox"/> 909-396-2179 <input type="checkbox"/> 310-233-2179	Email: <i>gvergara@aqmd.gov</i>	
*Key to Authority Abbreviations: SCAQMD - South Coast Air Quality Management District CH&SC - California Health and Safety Code CCR - California Code of Regulations			Method of Service: <input type="checkbox"/> In Person <input checked="" type="checkbox"/> Certified Mail	

VIOLATOR'S COPY



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

NOTICE OF VIOLATION

DATE OF VIOLATION		
Month:	Day:	Year:

Facility Name:		Facility ID#:	Sector:
Location Address:	City:		Zip:
Mailing Address:	City:		Zip:

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 type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR			_____ _____ _____	_____ _____ _____
2	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR			_____ _____ _____	_____ _____ _____
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:		Phone:	Served By:	Date Notice Served:
Title:	Email:	Phone No:	Email:	
		909-396-310-233-		@ 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

FILE COPY (Pink)

FACILITY COPY (Gold)

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	http://www.aqmd.gov/home/about
	Enforcement Authority	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



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

P 79906

NOTICE OF VIOLATION

DATE OF VIOLATION		
Month	Day	Year
03	15	2024

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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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: Amber Gonzalez	Date Notice Served: 03/15/2024
Title: District Manager	Email: Steven.cassulo@wasteconnections.com	Phone No: <input checked="" type="checkbox"/> 909-396-2043 <input type="checkbox"/> 310-233-	Email: agonzalez@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

ORIGINAL



NOTICE OF VIOLATION

DATE OF VIOLATION		
Month	Day	Year
3	19	2024

Facility Name:	Chisuta 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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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	California Health & Safety Code 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:	661-371-9217	Served By:	Alemayehu Solomon	Date Notice Served:	3-19-2024
Title:	District Manager	Email:	stere.ca@wasteconnectors.com	Phone No:	<input checked="" type="checkbox"/> 909-396-3256 <input type="checkbox"/> 310-233-	Email:	asolomon @ 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

Email

☒ Certified Mail

ORIGINAL



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

P 79607

NOTICE OF VIOLATION

DATE OF VIOLATION		
Month	Day	Year
03	20	2024

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

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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 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		— — —	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	Abriel Alberto	Date Notice Served	03/20/24
Title	District Manager	Email	Steve.c@wasteconnections.com	Phone No	<input checked="" type="checkbox"/> 909-396-2312 <input type="checkbox"/> 310-233-	Email	alberto @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

ORIGINAL



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

P 80913

NOTICE OF VIOLATION

DATE OF VIOLATION		
Month:	Day:	Year:
03	21	2024

Facility Name: CHINOITA 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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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	CAL H&S CODE 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: DANIEL DEL ROSARIO	Date Notice Served: 03-21-2024
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

*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 78046

NOTICE OF VIOLATION

DATE OF VIOLATION		
Month	Day	Year
3	22	24

Facility Name: Chiquita Canyon Landfill	Facility ID: 119219	State: VB
Location Address: 29201 Henry Mayo Road	City: Castaic	Zip: 91384
Mailing Address: 29201 Henry Mayo Road	City: Castaic	Zip: 91384

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DESCRIPTION OF VIOLATIONS

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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 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: Adam Martinez	Date Notice Served: 3/22/24
Title: District Manager	Email: Steven.cassulo@wasteconnections.com	Phone/Ext: <input checked="" type="checkbox"/> 909-396-2431 <input type="checkbox"/> 310-233-	Email: amartinez2 @aqmd.gov
*Key to Authority Abbreviations: SCAQMD - South Coast Air Quality Management District CH&SC - California Health and Safety Code CCR - California Code of Regulations		Method of Service: <input type="checkbox"/> In Person <input checked="" type="checkbox"/> Certified Mail	

ORIGINAL



P 75753

NOTICE OF VIOLATION

DATE OF VIOLATION		
Month: 3	Day: 25	Year: 2024

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>

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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>California Health & Safety Code 41720</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 Cassala</i>	Phone: <i>661.371.9214</i>	Served By: <i>Monique Solomon</i>	Date Notice Served: <i>3-25-2024</i>
Title: <i>District Manager</i>	Email: <i>stereca@wasteconnections.com</i>	Phone No: <input checked="" type="checkbox"/> 909-396-3256 <input type="checkbox"/> 310-233-	Email: <i>asoloman</i> @ 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

Email

☒ Certified Mail

ORIGINAL



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

P 80209

NOTICE OF VIOLATION

DATE OF VIOLATION		
Month:	Day:	Year:
03	27	24

Facility Name: Chiquita Canyon LLC		Facility ID#: 119219	Sector: VB
Location Address: 29201 Henry Mayo Dr		City: Valencia 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: 061 371-9214	Served By: JENNIFER CEDILLO	Date Notice Served: 03-27-24
Title: DISTRICT MANAGER	Email: STEVE.CASSULO@WASTECONNECTIONS.COM	Phone No: <input checked="" type="checkbox"/> 909-396-2025 <input type="checkbox"/> 310-233-	Email: JCEDILLO @ 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

ORIGINAL



NOTICE OF VIOLATION

DATE OF VIOLATION		
Month:	Day:	Year:
03	28	2024

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	2402			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	41706			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: 03/28/2024
Title: District Manager	Email: Steven.Cassulo@waterconnections.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: <input type="checkbox"/> In Person <input checked="" type="checkbox"/> Certified Mail
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NOTICE OF VIOLATION

DATE OF VIOLATION		
Month	Day	Year
03	29	24

Facility Name: Chiquita Canyon Landfill	Facility ID: 119219	Serial: 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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DESCRIPTION OF VIOLATIONS

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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			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				

Service To: Steve Cassulo	Phone: 616-371-9214	Served By: Daniel Woo	Date Served: 3/29/24
Title: District Manager	Email: steveca@wasteconnections.com	Phone No: <input checked="" type="checkbox"/> 909-396-2433 <input type="checkbox"/> 310-233-	Email: DW00 @aqmd.gov
Method of Service: <input type="checkbox"/> In Person <input checked="" type="checkbox"/> Certified Mail			

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CFR - Code of Federal Regulations

ORIGINAL

Attachment B

Disposal Facility (Site) Inspection Report (52)
Chiquita Canyon Sanitary Landfill (19-AA-0052)
2/7/2024

Inspection Information

Inspected By: Los Angeles County **Local Inspection ID:**
Inspection Date: 2/7/2024 **Time In:**
Inspection Type: Periodic **Time Out:**
Inspector: Eric Morofuji **Inspection Duration:**
Operator: Chiquita Canyon, Inc.
Received By:
Also Present (Name):
Cruz, site supervisor

Facility/Activity Information

Enforcement Agency: County of Los Angeles **SWIS Number:** 19-AA-0052
Facility: **Chiquita Canyon Sanitary Landfill**
29201 Henry Mayo Drive
Castaic, CA 91384
Activity: Solid Waste Landfill
Operational Status: Active **Regulatory Status:** Permitted
Land Owners(s):
Chiquita Canyon, Inc.

The above facility was inspected for compliance with applicable sections of Division 30 of the Public Resources Code (PRC) and Title 14 and Title 27, California Code of Regulations (CCR).

Violations

27 CCR 20921 - Gas Monitoring and Control

Ensure that landfill gas generated on site is controlled not to exceed 5% by volume in air at the site's perimeter boundary.

During the carry-over inspection on 2/13/24, methane gas concentrations above 5% were not detected at monitoring wells GP-13 and monitoring well GP-15 was not accessible due to work activity. Other wells were monitored at the west slope area which resulted in zero % methane. (See attached LFG monitoring log sheet)

Daily monitoring by the operator of GP-13 and GP-15 since 8/1/23 and 9/14/23, respectively, shows that methane levels continue to fluctuate in and out of compliance.

Disposal Facility (Site) Inspection Report (52)
Chiquita Canyon Sanitary Landfill (19-AA-0052)
2/7/2024

Based on the overall monitoring record of GP-13 and GP-15, the LEA does not have reasonable assurance that the landfill gas concentration at the perimeter monitoring wells will continue to decrease and stabilize. The LEA issued a letter dated 2/6/24 requesting for a revised remediation plan. Operator submitted a revised remediation plan which is under review by LEA.

27 CCR 20750 - Site Maintenance

The operator shall implement a preventative maintenance program to monitor and promptly repair or correct deteriorated or defective conditions with respect to requirements of the CIWMB standards, and conditions established by the EA. All other aspects of the disposal site shall be kept in a state of reasonable repair.

Due to leachate outbreaks and stability issues with leachate saturated slope and waste, the issues with high temperatures, and landfill gas collection, excessive leachate production, and unusual and large-scale settlement, the LEA is requiring Chiquita Canyon Landfill (CCL) to complete 4 Mitigation Measures as recommended by CalRecycle based on document review and a site inspection on 11/2/23.

*For further details of the above required actions, please refer to previous LEA Inspection Reports and LEA approval letters.

RE: CHIQUITA CANYON LANDFILL (Swis No. 19-AA-0052) CalRecycle's Review of Conditions at the Landfill.

See comments below for updates to the 4 Mitigation Measures.

Areas of Concern

27 CCR 20820 - Drainage and Erosion Control

Properly maintain the slopes and ensure the drainage system is designed to:

1. ensure integrity of the roads, structures, and LFG CS.
2. prevent safety hazards.
3. prevent exposure of waste.

Disposal Facility (Site) Inspection Report (52)
Chiquita Canyon Sanitary Landfill (19-AA-0052)
2/7/2024

Observed heavy erosion on the slope of the reaction area. See comments below.

See photos attached.

Inspection Report Comments

FEBRUARY DISPOSAL FACILITY INSPECTION REPORT - 2/7/24 and carryover inspection dated 2/13/24

Chiquita Canyon Landfill (19-AA-0052)

29201 Henry Mayo Drive

Castaic, CA 91384

27 CCR 20750 - Site Maintenance

Updates to the 4 Mitigation Measures:

Mitigation Measure #1 - Reaction/Break Barrier

- #1A - Plan submittal - Due 2 weeks after the installation of the temperature probes.
- #1B - Temperature Probes – CCL provided weekly updates dated 2/8/24, 2/15/24 and 2/22/24 which commented on the rain events that caused delays on delivery of materials and temperature probe drilling. Due to inclement weather, the timeline schedule changed so LEA issued a letter dated 2/26/24 to provide an updated construction schedule.

Mitigation Measure #2 - Cover

- #2A - On 2/2/24, CCL provided a system and procedure to prevent the accumulation of landfill gas under the geomembrane cover in the event the LFG collection and control system loses vacuum or becomes inoperative due to power outage. On 2/2/24, CCL provided an installation update of the geomembrane cover that 2.7 acres at the northerly end of the western slope was covered and installed.
- #2B - LEA receives weekly reports to track soil and geomembrane cover conditions.

Disposal Facility (Site) Inspection Report (52)
Chiquita Canyon Sanitary Landfill (19-AA-0052)
2/7/2024

Mitigation Measure #3 - Slope Stability Analysis

- LEA received a report for the Slope Stability Analysis dated 2/22/24 which is currently in review.

Mitigation Measure #4 - Manufacturer Maximum Temperature Design Specifications

- Further action pending installation of temperature monitoring probes.

27 CCR 20820 - Drainage and Erosion Control

Observed large cracks on slope due to heavy erosion causing waste to be exposed. The slope is located in the reaction area facing the south-west direction. Provide an approved drainage control as a preventive measure. Use and apply approved methods and procedures to eliminate the erosion issue and to ensure waste is properly covered and not exposed.

The following was observed during the periodic inspection:

- Observed orchard fans used for odor mitigation measures at the western slope and at the working face.
- Observed misters used for odor control located on fence at the western slope.
- Spotters in place to control traffic at the haul roads and working face.
- Observed skim at the western slope that appeared to be in good condition. No leachate observed at time of inspection.
- Using mulch for erosion control for slopes throughout landfill
- LEA staff conducted gas monitoring at perimeter monitoring wells - GP-11, GP-12, GP-13, GP-14. GP-15 was not accessible due to work activities in the area (See attached LFG Monitoring log sheet).
- CCL continues to provide weekly probe readings which results in methane exceedance above 5% by volume for probes GP-13 and GP-15.
- LEA issued a comment letter dated 2/6/24 for CCL to submit a 3rd Revised Remediation Plan for methane exceedance to include requesting for maps and figures of current and proposed extraction wells specific to probes GP-13 and GP-15. CCL required to describe a plan of action to remediate the methane gas migration and to submit a time schedule for the plan. CCL submitted revised remediation plan on 2/26/2024 which is under review by LEA.
- Reviewed site records were satisfactorily maintained.
- A copy of the inspection report will be emailed to Steve Cassulo, Nicole Ward, and Amanda Froman.

SB1383: Short-lived Climate Pollutants (SCLP): Organic waste methane emissions

Disposal Facility (Site) Inspection Report (52)
Chiquita Canyon Sanitary Landfill (19-AA-0052)
2/7/2024

reductions. Effective January 1, 2022, the LEA is enforcing implementation and reporting requirements pursuant to SB1383.

Attachments

Methane monitoring log sheet
Photo logs

Attachment C



NOTICE OF VIOLATION

DATE OF VIOLATION		
Month:	Day:	Year:
12	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 type="checkbox"/> SCAQMD <input checked="" type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	42401	Order for Abatement Case No. 6177-4	38	Failed to have monthly leachate samples analyzed per U.S. EPA Method 624.1 for the presence of volatile organic compounds (VOCs) and toxic air contaminants (TACs). Failed to post sample results on facility's website within 1 week of receipt from the contract laboratory. Failed to provide detailed description and depiction of sampling locations within 1 week of receipt from the contract laboratory.
2	<input type="checkbox"/> SCAQMD <input checked="" type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	42401	Order for Abatement Case No. 6177-4	39	Failed to update facility website's "Odor and Maintenance Logs" and "Reports, Permits, and Other Documents" sections with information for November 2023, December 2023, and January 2024 in Spanish.
3	<input type="checkbox"/> SCAQMD <input checked="" type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	42401	Order for Abatement Case No. 6177-4	42(a)	Failed to notify South Coast AQMD at least two (2) days prior to excavation commencement.
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: Christina Ojeda	Date Notice Served: 3/20/2024
Title: District Manager	Email: steven.cassulo@wasteconnections.com	Phone No: <input checked="" type="checkbox"/> 909-396-2475	Email: cojeda@aqmd.gov	

*Key to Authority Abbreviations:

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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 ☒ Electronic Mail

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 http://www.aqmd.gov/home/about
General Counsel's Office (909) 396-3400	Enforcement Authority http://www.aqmd.gov/home/about/authority/enforcement
	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
Billing Services (866) 888-8838 (909) 396-2900	Permitting Fees http://www.aqmd.gov/home/permits/fees
Variances:	
Clerk of the Hearing Board (909) 396-2500	The Hearing Board http://www.aqmd.gov/home/about/hearing-board

Attachment D



NOTICE OF VIOLATION

DATE OF VIOLATION		
Month:	Day:	Year:
1	18	2024

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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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	3002(a)(1)			Installed and operated leachate treatment system without first obtaining a Permit to Operate
2	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	3002(c)(1)	G43917	1	Modified landfill gas collection system without first obtaining a Permit to Operate
3	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	3002(c)(1)	G66132	1	Modified landfill gas condensate and leachate collection storage system without first obtaining a Permit to Operate
4	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	3002(c)(1)	G73696	1	Modified Flare Nos. 1 & 2 without first obtaining a Permit to Operate
5	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	202	A/N 624296	1	Modified and operated Flare No. 3 contrary to the description and conditions specified in the Permit to Construct

Served To: Steve Cassulo		Phone: 661-371-9214	Served By: Gerardo Vergara	Date Notice Served: 3/20/2024
Title: District Manager	Email: steven.cassulo@wasteconnections.com	Phone No: <input checked="" type="checkbox"/> 909-396-2179	Email: gvergara@aqmd.gov	

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CCR – California Code of Regulations

CH&SC – California Health and Safety Code
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Method of Service:

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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.*

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- **Minor Source Penalty Assessment Program**

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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.

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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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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 http://www.aqmd.gov/home/about
		Enforcement Authority 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 E



Los Angeles Regional Water Quality Control Board

March 28, 2024

Steve Cassulo
Waste Connections, Inc.
Chiquita Canyon Landfill
29201 Henry Mayo Drive
Castaic, CA 91384

**VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED
CLAIM NO. 7022 3330 0000 0154 1265**

Dan Schooler
Legal Responsible Person
Chiquita Canyon Landfill
29201 Henry Mayo Drive
Castaic, CA 91384

**VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED
CLAIM NO. 7022 3330 0000 0154 1258**

Amanda Garcia
Agent for Services of Process Employee
1505 Corporation, CT Corporation System
330 N. Brand Blvd
Glendale, CA 91203

**VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED
CLAIM NO. 7022 3330 0000 0154 1456**

**NOTICE OF VIOLATION: DISCHARGE PROHIBITIONS AND FAILURE TO DEVELOP
A COMPLETE STORM WATER POLLUTION PREVENTION PLAN AND IMPLEMENT
BEST MANAGEMENT PRACTICES – CHIQUITA CANYON LANDFILL, 29201 HENRY
MAYO DRIVE, CASTAIC, CALIFORNIA (WDID NO. 4 19I022488)**

Dear Steve Cassulo, Dan Schooler, and Amanda Garcia:

The State Water Resources Control Board's National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Industrial Activities amended November 6, 2018 and effective July 1, 2020 (Order No. 2014-0057-DWQ amended by 2015-0122-DWQ), NPDES No. CAS000001 (Industrial General Permit¹) regulates stormwater runoff that discharges to surface water or to a storm sewer that flows to surface water. The Los Angeles Regional Water Quality Control Board (Los Angeles Water Board) is the state regulatory agency responsible for protecting water quality in Los Angeles and Ventura Counties.

¹ The Industrial General Permit can be downloaded from the State Water Resources Control Board website at:
https://www.waterboards.ca.gov/water_issues/programs/stormwater/igp_20140057dwq.shtml

Chiquita Canyon Landfill (Permittee) operates an industrial facility located at 29201 Henry Mayo Drive, in Castaic, an unincorporated community in Los Angeles County, (WDID No. 4 191022488) that is regulated under the Industrial General Permit. The industrial activities at Chiquita Canyon Landfill consist of refuse systems and landfill operations. These activities are classified under Standard Industrial Classification (SIC) code 4953 – Refuse Systems.

On January 21, 2010, the Permittee signed a Notice of Intent (NOI) to be enrolled under the Industrial General Permit. In signing the NOI, the Permittee certified to the State of California that they have read the Industrial General Permit and will comply with all its requirements. As specified in the Industrial General Permit, the Permittee is required to develop a Storm Water Pollution Prevention Plan (SWPPP), in which the Permittee must identify potential sources of pollution and describe specific best management practices (BMPs) that shall be implemented to eliminate or reduce stormwater pollution from the facility. Also, the Industrial General Permit requires the Permittee to develop a Monitoring Implementation Plan (MIP) and include it in the SWPPP to ensure monitoring and elimination of the discharge of pollutants into stormwater from the facility.

On January 29, 2024, Sean Lee, Los Angeles Water Board Staff (Staff) was granted access and authorization by Nicole Ward (Assistant District Manager) to inspect and take photographs of the facility. Nicole Ward guided Staff throughout the facility inspection. BMP violations were observed during the inspection (Photographs 1-5), which were discussed with Nicole Ward.

On February 20, 2024, Staff and other Los Angeles Water Board Staff (Lesley Walther and Doug Cross), were granted access and authorization by Nicole Ward (Assistant District Manager) to inspect and take photographs of the facility and collect effluent discharge samples. Nicole Ward guided all Staff throughout the facility inspection.

Based on Staff's inspection of the facility on January 29, 2024 and February 20, 2024, review of records uploaded by the Permittee in SMARTS, and occurrences of severe storm events during the weeks of February 4, 2024 and February 18, 2024, the Permittee is in violation of the following provisions of the Industrial General Permit:

Discharge Prohibition Violations:

- 1) The Permittee's December 22 and December 28, 2023 effluent sampling of the south detention basin discharge indicated that Total Suspended Solids (TSS) was present at 170 milligrams per liter (mg/L) and 240 mg/L, respectively, above the Effluent Limitation Guidelines (ELG) maximum monthly average of 27 mg/L [these results are also above the annual Numeric Action Level (NAL) of 100 mg/L]. The December 28, 2023 sample also showed that biochemical oxygen demand (BOD) was present at 93 mg/L, above the ELG's maximum monthly average of 37 mg/L. Other analytical results showing notable detections include iron (Fe) at 4.5 mg/L [above the annual NAL of 1.0 mg/L], E. Coli at 650,000 most probable number per 100 milliliters (MPN/100 mL) [above the Total Maximum Daily Load NAL (TNAL) =

235 MPN/100 mL], and Total Coliform at 2,419,600 MPN/100 mL. These results were significantly higher compared to the sampling results in December 2022, as well as higher than the applicable regulatory benchmarks. Additionally, multiple Waste Discharge Requirement (WDR, Order No. R4-2018-0172) monitoring parameters (MPars) were detected in the December 28, 2023 samples including phenol, ammonia, chloride, arsenic, chromium, and zinc. Based on this reported data and the severe weather condition on December 22, 2023, leachate comingled with stormwater runoff which flowed into the stormwater basin and into the south detention basin where it discharged into the Santa Clara River. This is a violation of Industrial General Permit Sections III.A-C, V.A-B, and VI.A-C.

- 2) The Permittee's January 17 and January 22, 2024 effluent sampling of the south detention basin discharge indicated that TSS was detected at 31 mg/L and 64 mg/L, respectively, above the ELG's maximum monthly average of 27 mg/L. BOD was detected at 46 mg/L and 45 mg/L, respectively, above the ELG's maximum monthly average of 37 mg/L. Results for other parameters with notable detections during the January 17, 2024 sampling event included E. Coli at 2,400 MPN/100 mL [TNAL = 235 MPN/100 mL] and Total Coliform at 92,000 MPN/100 mL. Additionally, benzoic acid, p-cresol, phenol, ammonia, arsenic, chromium, and zinc (WDR MPars, Order No. R4-2018-0172) were detected in the January 22, 2024 sample.

During the January 29, 2024 inspection, Staff observed facility personnel conducting power washing and cleanup of the concrete-lined drainage channel that is adjacent to the leachate leaking and collection area. The portion of the concrete-lined drainage channel that was being cleaned up is located upgradient of the stormwater basin. Based on this reported data and the proximity of the leachate leaking area to the channel, leachate migrated into the concrete-lined drainage channel, comingled with stormwater runoff which flowed into the stormwater basin and into the south detention basin where it discharged into the Santa Clara River. This is a violation of Industrial General Permit Sections III.A-C, V.A-B, and VI.A-C.

- 3) The Permittee's February 5 and February 20, 2024 effluent sampling of the south detention basin discharge indicated that TSS was detected at 330 mg/L and 110 mg/L, respectively, above the ELG's maximum monthly average of 27 mg/L [also above the annual NAL of 100 mg/L]. BOD was detected on February 5, 2024 at 74 mg/L above the ELG's maximum monthly average of 37 mg/L. Results for other parameters with notable detections include Fe [above annual NAL of 1.0 mg/L] at 7.3 mg/L and 4.5 mg/L on February 5 and February 20, 2024, respectively, and both E. Coli [TNAL = 235 MPN/100 mL] and Total Coliform detected greater than 1,600 MPN/100 mL on both February 5 and February 20, 2024. Additionally, benzoic acid, p-cresol, phenol, ammonia, arsenic, chromium, and zinc (WDR MPars, Order No. R4-2018-0172) were detected in the February 2024 samples.

During the week of February 4 and February 19, 2024, heavy rainstorm events occurred at Chiquita Canyon Landfill over at least a period of three days. Based on this reported data and the occurrence of severe weather conditions, leachate comingled with stormwater runoff which flowed into the stormwater basin and into the south detention basin where it discharged into the Santa Clara River. This is a violation of Industrial General Permit Sections III.A-C, V.A-B, and VI.A-C.

SWPPP/MIP Violations:

1. The Permittee has not included sampling/monitoring for all ELG parameters in the SWPPP/MIP as required under the Industrial General Permit. This is a violation of the Industrial General Permit Sections XI.B.6.g and X.I and Attachment A.1.
2. The SWPPP certification page is missing. This is a violation of the Industrial General Permit Section X.B.2.
3. The facility map (posted 08/27/2018 in SMARTS and dated 07/25/2018) is not updated and does not reflect current site conditions and structural features. This is a violation of the Industrial General Permit Section X.E.
4. The evaluation of potential pollutant sources in the SWPPP has not been updated to include the ongoing leachate seepage onsite. This is a violation of the Industrial General Permit Section X.F-G.
5. Additional BMPs implemented for the containment of existing leaking leachate and cleanup of potential migration of leachate into the storm channels and other stormwater runoff pathways are not included and discussed in the SWPPP. This is a violation of the Industrial General Permit Section X.H.2.

BMP Violations:

1. Effective BMPs have not been implemented at the leachate seepage and collection area to ensure leachate containment and prevention of its migration into the storm channel and stormwater basin. Leachate seepage is currently ongoing at the landfill perimeter and not yet fully contained. The seepage area is located upgradient of the stormwater basin and in very close proximity to the concrete storm channel as shown in Photographs 1-13 attached. This is a violation of the Industrial General Permit Section X.H.2.
2. Additional supplemental BMPs have not been implemented to safeguard full containment of all leachate from the seepage area. The Industrial General Permit does not authorize the discharge of leachate. Due to the proximity of the leachate seepage area to the concrete storm channel, the risk to discharge or migrate or comingled with stormwater runoff is extremely high, therefore, supplemental BMPs are required to prevent its discharge. The lack of supplemental BMPs is a violation of the Industrial General Permit Section X.G.e.

3. There is inadequate landfill slope stabilization: erosion and rills, broken sandbags in slope check dams, and collapsed silt fences were observed on landfill slopes (Photographs 4 and 5). This is a violation of the Industrial General Permit Section X.H.1.e.

Chiquita Canyon Landfill is required to take the following actions immediately:

1. Implement effective BMPs to fully capture and contain the leachate at seepage areas. Implement effective BMPs to prevent migration of leachate and comingled leachate and stormwater runoff into onsite drainage channels, drain inlets, and drainage pipes that discharge into the stormwater basin, south detention basin, and Santa Clara River.
2. Implement and maintain effective erosion and sediment control BMPs. Address all erosions and rills on the slope and stabilize all slopes effectively, especially in landfill areas with leachate seepage. Replace broken sandbags and replace/repair collapsed silt fences.
3. Monitor and prevent discharge of NSWD containing leachate pollutants into the Santa Clara River.
4. Revise the facility's SWPPP/MIP to include all information listed above as required in the Industrial General Permit. A copy of the Permit can be found at:

https://www.waterboards.ca.gov/water_issues/programs/stormwater/docs/industrial/2014indgenpermit/wqo2014_0057_dwq_revmar2015.pdf

5. Update the SWPPP/MIP to incorporate new BMPs and all monitoring requirements including general parameters, TMDLs, and ELGs. Implement the updated SWPPP/MIP and conduct effluent discharge monitoring, retain a copy of the updated SWPPP onsite, train employees, and post the updated SWPPP into SMARTS.

By **April 29, 2024**, the Permittee is required to submit a written response, with photographic evidence, identifying the measures taken to comply with the above items, stating that corrective actions are being implemented and monitored, and confirming that you have amended, certified, and uploaded a copy of your updated SWPPP into SMARTS. The response must be submitted as a pdf file format via email to:

Sean Lee
Sean.Lee@waterboards.ca.gov
Los Angeles Regional Water Quality Control Board
Stormwater Compliance & Enforcement Unit
320 W. 4th Street, Suite 200
Los Angeles, CA 90013
(213) 620-2219

These violations may result in an enforcement action, including imposition of administrative civil liabilities of up to ten thousand dollars (\$10,000) for each day of each violation plus \$10 per gallon discharged pursuant to California Water Code (Water Code) section 13385. These administrative civil liabilities may be assessed by the Los Angeles Water Board beginning with the date that the violations first occurred. The Los Angeles Water Board may also refer this matter to the Attorney General's Office for further enforcement. This notice shall not be deemed to relieve the facility of liability for any penalties that may have already accrued. The Los Angeles Water Board reserves its right to take any further enforcement action authorized by law.

If you need assistance or have questions regarding this notice, please contact Sean Lee at (213) 620-2219, via email at Sean.Lee@waterboards.ca.gov or Nerissa Schrader at (213) 620-2237, via email at Nerissa.Schrader@waterboards.ca.gov.

Sincerely,

Russ Colby
Acting Assistant Executive Officer

Attachments: Inspection Photographs 1-13, January 29, 2024 and February 20, 2024

cc: (via email)

Joe Baiocco, County of Los Angeles
Thanne Berg, United States Environmental Protection Agency
Rachel Zwilling, California Environmental Protection Agency
Shikari Nakagawa-Ota, Los Angeles County, Environmental Protection Branch
Dorcus Hanson-Lugo, Los Angeles County Department of Public Health
Karen Gork, Los Angeles County Department of Public Health
Karlo Manalo, Los Angeles County Department of Public Works
Ramon Herman, Los Angeles County Department of Public Works
Wes Mindermann, California Department of Resources Recycling and Recovery
Janelle Heinzler, California Department of Resources Recycling and Recovery
Jeff Lindberg, California Air Resources Board
Vanessa Aguila, California Air Resources Board
Jack Cheng, South Coast Air Quality Management District
Larry Israel, South Coast Air Quality Management District
Abigail DeSesa
Sarah Olaguez
Lynne Plambeck, SCOPE
Bob Lewis, Chiquita Canyon Landfill Community Advisory Committee



Photograph 1 (Taken January 29, 2024)

Dirt check dam in concrete-lined storm channel to contain/capture pressure wash water and landfill leachate that may have entered the channel.



Photograph 2 (Taken January 29, 2024)

Upgradient view of concrete-lined storm channel being pressure-washed to clean for leachate and wash water removed by a vacuum truck. A soil check dam placed downgradient of pressure washing area to capture wash water and leachate.



Photograph 3 (Taken January 29, 2024)

Leachate seepage/leaking area and collection point located at the landfill perimeter immediately upgradient of the south stormwater basin and across the storm channel; accumulated leachate is pumped into trucks and transported offsite for disposal.



Photograph 4 (Taken January 29, 2024)

Erosion on landfill slopes and collapsed silt fence.



Photograph 5 (Taken January 29, 2024)
Broken sandbags in a check dam.



Photograph 6 (Taken February 20, 2024)
Rills and erosion on active landfill slope.



Photograph 7 (Taken February 20, 2024)
Dirt check dam present in concrete-lined drainage channel/v-ditch adjacent to leachate seepage area with muddy stormwater flow.



Photograph 8 (Taken February 20, 2024)
The leachate seepage/leaking area and collection point located at the landfill perimeter upgradient of the stormwater basin and across from the concrete drainage channel/v-ditch; an emergency pumping equipment observed continuously pumping.



Photograph 9 (Taken February 20, 2024)

The leachate seepage/leaking area and collection point located at the landfill perimeter upgradient of the stormwater basin and across from the concrete drainage channel/v-ditch; accumulated leachate from the plastic-lined area is continuously pumped into the sump by emergency pumping equipment.



Photograph 10 (Taken February 20, 2024)

The leachate seepage/leaking area and collection point located at the landfill perimeter upgradient of the stormwater basin and across from the concrete drainage channel/v-ditch; location of sump where leachate is being pumped from the seepage area.



Photograph 11 (Taken February 20, 2024)

The leachate seepage/leaking area and collection point located at the landfill perimeter upgradient of the stormwater basin and across from the concrete drainage channel/v-ditch; orange hose is used in leachate emergency pumping operation into the sump.



Photograph 12 (Taken February 20, 2024)

Narrow unpaved road between the leachate seepage/leaking area and the concrete-lined drainage channel/v-ditch.



Photograph 13 (Taken February 20, 2024)

Narrow unpaved road between the leachate seepage/leaking area and the concrete-lined drainage channel/v-ditch; emergency pumping equipment and ancillary orange hoses are shown transferring leachate into the sump. This area is located uphill and in very close proximity to the drainage channel/v-ditch; no additional BMPs observed in place to prevent flow of any escaping leachate into the drainage channel.

Attachment F



Yana Garcia
Secretary for
Environmental Protection



Department of Toxic Substances Control

Meredith Williams, Ph.D., Director
7575 Metropolitan Drive, Suite 108
San Diego, CA 92108



Gavin Newsom
Governor

SUMMARY OF VIOLATIONS

On December 12, 2023, the California Environmental Protection Agency, Department of Toxic Substances Control (DTSC), began an investigation at:

Facility Name:	Chiquita Canyon, LLC		
Facility Address:	29201 Henry Mayo Drive, Castaic, CA 91384		
EPA ID Number:	CAL000347030	County:	Los Angeles

As a result of this continued investigation, DTSC discovered violations of the California Hazardous Waste Control Law and its implementing regulations that are identified on the attached pages. You must correct the following violations within the schedule for compliance for each violation. If you disagree with the alleged violations listed in this Summary of Violations, you must inform DTSC in writing. If additional violations are found after this investigation, such violations, if any, will be identified in writing.

DTSC will provide you with a complete investigation report within 65 days of the date of this investigation. You may request a meeting with DTSC to discuss the investigation, investigation report, or this Summary of Violations. The issuance of this Summary of Violations does not preclude DTSC from taking administrative and/or civil action or from referring the matter for criminal prosecution as a result of the violations identified herein or violations that have not been corrected within the time specified by DTSC. Failure to comply with a schedule for compliance is a violation of the law subject to a civil penalty of up to \$70,000 for each day of noncompliance. In addition, a false statement that compliance has been achieved is a violation of the law and subject to a penalty of up to \$70,000 for each occurrence. DTSC may re-investigate this facility at any time.

Facility Representative Accepting
Summary of Violations

Name: _____
Signature: _____
Title: _____
Date: _____

DTSC Representative

Name: Erin Neal
Signature: *Erin Neal*
Title: Environmental Scientist
Date: 3/29/2024



Department of Toxic Substances Control
7575 Metropolitan Drive, Suite 108
San Diego, CA 92108

SUMMARY OF VIOLATIONS

Facility Name: Chiquita Canyon, LLC Date: 3/29/2024

SECTION I: NON - MINOR VIOLATIONS AND REQUIRED CORRECTIVE ACTION (Violations not considered Minor Violations)

You must correct the following violation(s) within the specified time frame for each violation.

Violation # 1

Violation Citations:

California Code of Regulations, title 22 (22 CCR) § 66265.31, Facilities shall be maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

Description:

On and/or before March 11, 2024, Chiquita Canyon, LLC failed to minimize the possibility of releases of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

On February 14, 2024, Chiquita Canyon, LLC memorialized in a letter to DTSC the need for the use of the immediate response exemption pursuant to 22 CCR § 66264.1(g)(8)(A)(2), 66265.1(e)(11)(A)(2), and 66270.1(c)(3)(A)(2). Chiquita Canyon, LLC stated:

“[T]here is an imminent and substantial threat that such potential hazardous wastes could be discharged into the environment. ... [D]ue to the space constraints and limitations in accumulation capacity, Chiquita has temporarily shut off pumps to reduce the amount of liquids that are extracted from the reaction. This does not mean that liquid is not being produced by the reaction; it means that liquid is continuing to accumulate inside of the waste mass. The liquid must go somewhere.”

On March 5, 2024, DTSC issued an information request to Chiquita Canyon, LLC for all leachate manifests since January 1, 2024. Chiquita Canyon, LLC provided DTSC with hazardous waste manifests on March 12, 2024. According to the records provided by Chiquita Canyon, LLC, no leachate was manifested for hazardous waste disposal from 2/14/2024 to 2/25/2024, 3/2/2024 to 3/3/2024, 3/5/2024 to 3/7/2024, and 3/10/2024 to



Department of Toxic Substances Control

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San Diego, CA 92108

3/11/2024. As a result, Chiquita Canyon, LLC did not utilize all resources to demonstrate an immediate response to minimize the possibility of releases of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment. Chiquita Canyon, LLC failed to utilize all permitted hazardous waste treatment, storage, and disposal facilities (TSDFs) for off-site shipments of hazardous waste leachate.

Violation Classification:

This is a class 1 violation.

Compliance Requirement:

Chiquita Canyon, LLC shall utilize all potential hazardous waste disposal options to the fullest extent to minimize the possibility of any unplanned sudden or non-sudden releases of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment. Within **three** days of this Summary of Violations, Chiquita Canyon, LLC shall provide a written list of all potential permitted hazardous waste disposal facilities where leachate can be disposed, including the daily maximum quantities allowed and Chiquita **must** send daily shipments of hazardous waste leachate at the maximum allowable quantities to the identified offsite disposal locations. At the end of each and every day (by 11:59 PM), Chiquita shall provide copies of hazardous waste manifests to DTSC for all shipments of hazardous waste leachate sent off-site that day.

Violation # 2

Violation Citations:

Health and Safety Code (HSC) § 25189.2(c), A person who disposes, or causes the disposal of, a hazardous or extremely hazardous waste at a point that is not authorized according to the provisions of this chapter is liable for a civil penalty of not more than seventy thousand dollars (\$70,000) for each violation and may be ordered to disclose the fact of this violation or these violations to those persons as the court or, in the case of an administrative action, a hearing officer, may direct. Each day on which the deposit remains is a separate additional violation, unless the person immediately files a report of the deposit with the department and is complying with an order concerning the deposit issued by the department, a hearing officer, or a court of competent jurisdiction for the cleanup.

Description:

On and/or before February 21, 2024, Chiquita Canyon, LLC disposed and/or caused the disposal of two truckloads, approximately 10,000 gallons total, of hazardous waste leachate by sending this leachate to Patriot Environmental Services (Patriot) at 314 W. Freedom Avenue, Orange, CA 92865 on non-hazardous manifest #9229 and #9133. The leachate was pulled from Tank #45 at Chiquita Canyon Landfill, which was sampled on February 18, 2024, indicating that the tank contained benzene at 0.6 mg/L, above the Toxicity Characteristic Leaching Procedure (TCLP) regulatory threshold of 0.5 mg/L



Department of Toxic Substances Control

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San Diego, CA 92108

for benzene. Approximately 18 hours after treatment, on February 20th, post-treatment sampling was conducted on Tank #45. Sampling results from Chiquita Canyon, LLC showed that the tank contained benzene at 0.5 mg/L, at the TCLP regulatory threshold for benzene. Samples were also collected of waste leachate remaining in Tank #45 after most of the waste was already received and processed by Patriot. This sample had 0.6 mg/L benzene.

Chiquita Canyon, LLC sent a letter to Patriot regarding these exceedances on February 26, 2024. Chiquita Canyon, LLC stated in its letter that it recognized that this leachate was released into Patriot's treatment process.

Violation Classification:

This is a class 1 violation.

Compliance Requirement:

Chiquita Canyon, LLC shall immediately take steps to ensure that hazardous waste leachate is not disposed of at a point that is not authorized. Within 15 days of this Summary of Violations, Chiquita Canyon, LLC shall provide a written explanation of how the facility will ensure that hazardous waste leachate is not disposed of at unauthorized locations.

Violation # 3

Violation Citations:

HSC § 25189.2(c), A person who disposes, or causes the disposal of, a hazardous or extremely hazardous waste at a point that is not authorized according to the provisions of this chapter is liable for a civil penalty of not more than seventy thousand dollars (\$70,000) for each violation and may be ordered to disclose the fact of this violation or these violations to those persons as the court or, in the case of an administrative action, a hearing officer, may direct. Each day on which the deposit remains is a separate additional violation, unless the person immediately files a report of the deposit with the department and is complying with an order concerning the deposit issued by the department, a hearing officer, or a court of competent jurisdiction for the cleanup.

Description:

On and/or before February 23, 2024, Chiquita Canyon, LLC disposed and/or caused the disposal of hazardous waste leachate due to a release onto the soil caused by a ruptured hose associated with the leachate treatment and storage tank, Tank #47, during treatment processes occurring at 29201 Henry Mayo Drive, Castaic, CA 91384. Tank #47 was sampled on February 21, 2024 by the facility and was found to have an exceedance for benzene, reporting 0.8 mg/L. This is above the TCLP regulatory limit for benzene of 0.5 mg/L. At the time of the release the tank was undergoing re-treatment and in addition to the hazardous waste leachate contained iron chelate and/or peroxide from the treatment process. The hazardous waste leachate and treatment mixture that was released came into contact with an employee of Chiquita Canyon, LLC. Per



Department of Toxic Substances Control

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San Diego, CA 92108

CalOES Spill Control #24-1157, that employee was injured by the release and transported to a local hospital.

Violation Classification:

This is a class 1 violation.

Compliance Requirement:

Chiquita Canyon, LLC shall immediately take steps to ensure that hazardous waste leachate is not released or disposed of at a point that is not authorized and remains safely contained. Within 15 days of this Summary of Violations, Chiquita Canyon, LLC shall provide a written explanation of how the facility will ensure that no release or disposal occurs.

SECTION II: OTHER ISSUES/CONCERNS

The following issues/concerns were identified during this investigation. Further research may identify additional violations. Any new violations, with the prescribed corrective action and schedule for compliance, will be identified in the Violation section of the investigation report.

1. The facility is generating RCRA hazardous waste and thus should have a federal EPA ID number. Please provide us with that number or obtain one if you have not already.

Attachment G

Action Items for South Coast Air Quality Management District

Case No. 6177-4 Stipulated Order for Abatement (modified on March 21, 2024)

Completed Actions

Condition No.	Key Action	Start Date/Deadline	Status
1(f)	Designate an employee able to receive notifications related to odor surveillance results	9/7/2023	Completed
31	Submit completed design for the geosynthetic cover	9/12/2023	Completed
13	Connect 18 vertical dual extraction wells to the LFG system	9/15/2023	Completed
45	Install, maintain, and operate 1,000 feet or more of Semi-Permanent Vapor Odor Control in the Reaction Area	9/20/2023	Completed
1(a)	Contract with a trained third party to conduct odor surveillance	10/6/2023	Completed
12, 12(a)	Form the Reaction Committee	10/6/2023	Completed
12	Provide Reaction Committee member information to South Coast AQMD	10/6/2023	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
12(i)	Submit report on initial flux chamber study	10/31/2023	Completed
15	Notify South Coast AQMD of number of wells added to wellfield	10/31/2023	Completed
21	Submit permit application for Flare 4	10/31/2023	Completed
31	Notify South Coast AQMD on progress of procuring and installing cover	10/31/2023	Completed
44	Obtain and install onsite MET station in the Reaction Area	10/31/2023	Completed
17	Identify LFG wells with worst liquid impaction issues in the Reaction Area	11/3/2023	Completed
12(g)(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
12(g)(iii)	Submit report on feasibility of continuous community emission monitoring system	12/1/2023	Completed
32	Submit report on air dispersion modeling	12/1/2023	Completed

Condition No.	Key Action	Start Date/Deadline	Status
18	Submit proposed Reaction Area dewatering guidelines	12/5/2023	Completed
12(g)(ii)	Submit report on investigation on landfill reaction cause and solutions to slow the reaction	12/8/2023	Completed
12(g)(iii)	Submit workplan for installation of continuous monitoring	12/31/2023	Completed
12(i)	Submit proposal for second flux chamber study	12/31/2023	Completed
12(g)(v)	Submit report on health risks of DMS	1/15/2024	Completed
32(b)	Submit proposal for additional air modeling study	1/15/2024	Completed
34	Provide South Coast AQMD with access to all real-time continuous monitoring data for TRS and TAC	1/19/2024	Completed
35	Provide South Coast AQMD all SOPs and QA/QC documents for air monitoring equipment	1/19/2024	Completed
41	Submit Rule 1150 Landfill Excavation Plan	1/30/2024	Completed
15(a)	Provide the design and installation schedule for 70 new wells and their associated piping	1/31/2024	Completed
36	Provide updates to South Coast AQMD on the installation of the continuous BTEX/VOC monitoring equipment	2/16/2024	Completed
37	Take at least 10 liquid samples from wells with pumps in the Reaction Area with the highest average temps to the extent possible and analyze per USEPA Method 624.1	3/5/2024	Completed
37	Submit the results to South Coast AQMD along with the lab analysis from the 10/20/23 sampling event	Within 1 week of the results	Completed
26	Prepare and submit to South Coast AQMD the Discharge of Pressurized Leachate Containment Feasibility Study	3/12/2024	Completed
50	Provide a workplan listing the actions Chiquita plans to take to address the reaction	3/13/2024	Completed
17	Install dewatering sumps/pumps in at least 60% of vertical wells in the Reaction Area capable of extracting liquids; if infeasible, provide detailed rationale and reasoning in Condition 8 report and continue implementing dewatering guidelines	3/15/2024	Completed pending April Condition 8 monthly report
36	Provide updates to South Coast AQMD on the installation of the continuous BTEX/VOC monitoring equipment	3/17/2024	Completed
67	Designate an Inspection Liaison	3/25/2024	Completed

Condition No.	Key Action	Start Date/Deadline	Status
64	Provide Leachate Management Plan submitted to EPA under UAO to South Coast AQMD	3/28/2024	Completed

Ongoing Actions

Condition No.	Key Action	Start Date/Deadline	Status
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	9/7/2023; ongoing	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
3(a)	Monitor and record landfill gas temperature at the inlet of the treatment system; temp must not exceed 145°F	1/18/2024; ongoing	Ongoing
4	Maximize LFG combustion in all flares to limit release of raw LFG	3/21/2024; ongoing	Ongoing
4	Prioritize Flare 2 and Flare 3 over Flare 1	9/7/2023; ongoing	Ongoing
5	Sample LFG sulfur compounds combusted using colorimetric tests for H ₂ S	3/21/2024; weekly	Ongoing
5	Sample LFG sulfur compounds for total sulfur compounds as H ₂ S using South Coast AQMD Method 307-91	3/21/2024; daily	Ongoing
5	Sample, analyze, and record LFG sulfur compounds and speciated organic compounds in the raw, pre-treatment and pre-control LFG from the Reaction Area for total sulfur compounds at H ₂ S using SCAQMD Method 307-91 and for speciated organic compounds using EPA Method TO-15	3/21/2024; monthly	Ongoing
6	Maintain adequate stock of appropriately ranged colorimetric tubes	9/7/2023; ongoing	Ongoing

Condition No.	Key Action	Start Date/Deadline	Status
7(a), (b)	Measure the total amount of landfill gas combusted at the facility; measure the daily flow of landfill gas not flared	9/7/2023; ongoing	Ongoing; see Condition 8 monthly reports
8	Submit monthly written report to South Coast AQMD	9/30/2023; monthly	Ongoing; posted on Chiquita's website
9	Conduct integrated landfill surface sampling	9/20/2023; ongoing	Ongoing
9(b)	Review and revise Reaction Area	10/6/2023; ongoing	Ongoing
9(a)	Submit revised Reaction Area map and related documentation to South Coast AQMD	10/6/2023; monthly	Ongoing; posted on Chiquita's website
10	Conduct instantaneous landfill surface monitoring	9/13/2023; ongoing	Ongoing
11	Continue operating flares and treatment system despite exceedances of the TRS and SOx limits	9/7/2023; ongoing	Ongoing
11	Submit deviation reports in accordance with Title V permit to South Coast AQMD	1/18/2024; ongoing	Ongoing
12(f)	Host a monthly virtual meeting with all members of the Reaction Committee and South Coast AQMD technical staff	March 2024; monthly	Ongoing
12(h)	Post all expert reports on Odor Mitigation webpage	Upon submission of export reports	Ongoing
13	Expand gas well system	9/7/2023; ongoing	Ongoing
13	Continue to operate the two sumps with pumps along the west slope; as new landfill gas wells are completed, begin operating them	3/21/2024; ongoing	Ongoing
14	Address wells with temps above 170 degrees Fahrenheit	9/7/2023; ongoing	Ongoing
14	Monitor each LFG system well for temperature at least monthly	9/7/2023; ongoing	Ongoing
14	Continue to operate all wells despite temp exceedances as necessary	9/7/2023; ongoing	Ongoing
14(a)	Ensure the operation of the collection system equipment does not result in the release of raw landfill gas or condensate into the atmosphere	1/18/2024; ongoing	Ongoing

Condition No.	Key Action	Start Date/Deadline	Status
14(b)	Report breakdowns or malfunctions of the collection system resulting in the emission of raw landfill gas within one hour after occurrence or within one hour of the time said person knew or reasonably should have known of its occurrence. Take immediate remedial measure to correct the breakdown or malfunction and prevent further emissions	1/18/2024; as needed	Ongoing
15	Add vertical dual extraction wells (as needed)	9/7/2023; ongoing	Ongoing
15	Expand well-field (as needed)	9/7/2023; ongoing	Ongoing
15	Document subsequent additions to the wellfield	9/7/2023; ongoing	Ongoing; see Condition 8 monthly reports
15(a)	Provide updates to the design and schedule for the 70 wells in Condition 8 reports	2/19/2024; ongoing	See Condition 8 monthly reports
15(c)	Notify South Coast AQMD which wells are scheduled to be installed the following week	1/18/2024; ongoing	Ongoing
15(e)	Use a landfill gas control box vented to an approved emissions control system while drilling a new well	1/18/2024; ongoing	Ongoing
15(f)	Complete and cap each well the same day its construction commences unless the well hole is completely covered or the subsequently installed pipe is capped	1/18/2024; ongoing	Ongoing
15(g)	Connect each horizontal well to an operating header or seal the ends of the well with blind flanges, glued or fused caps, or other approved seals as soon as the well is installed	1/18/2024; ongoing	Ongoing
15(h)	Properly cover and seal all openings and connections of the collection system in accordance with Title V permit and all applicable rules and regulations	1/18/2024; ongoing	Ongoing
15(i)	Install additional stainless steel, carbon steel, or CPVC wells in the Reaction Area	1/18/2024; ongoing	Ongoing
17, 17(a)	Expediently dewater wells to the maximum extent feasible; take proactive measure to remove additional liquids in the Reaction Area	3/21/2024; ongoing	Ongoing; see Condition 8 monthly reports

Condition No.	Key Action	Start Date/Deadline	Status
18	Implement proposed Reaction Area dewatering guidelines and implementation procedures	12/5/2023; ongoing	Ongoing
22	Continue using portable thermal oxidizer(s) until Reaction Committee concludes they are no longer needed; notify South Coast AQMD within 48 hours of determination	9/7/2023; ongoing	Ongoing
23	Continue using Flares 1 and 2 until Flare 4 is permitted and operational.	9/7/2023; ongoing	Ongoing
24	Operate and maintain the landfill to prevent standing leachate and the pooling or ponding of leachate exposed to the atmosphere	1/18/2024; ongoing	Ongoing
24	If pooling or ponding of liquid/leachate occurs, immediately collect and contain it in a sealed tanker truck or leachate tank, or promptly perform repairs to redirect the leachate into the leachate collection system	1/18/2024; ongoing	Ongoing
25	When encountering a discharge of pressurized leachate, mitigate odors and the dispersion and exposure of leachate into the atmosphere to the maximum extent possible. Once the discharge of pressurized leachate ends, remove soil saturated with leachate or add dry soil cover	1/18/2024; ongoing	Ongoing
27(a)	Measure, record, and report on leachate temps within the four 6-inch pipes feeding into the onsite frac tanks and at the piping leading into the bottom tanks	1/18/2024; ongoing	Ongoing; see Condition 8 monthly reports
27(b)	Conduct and document inspections for leachate seeps twice each calendar day	1/18/2024; ongoing	Ongoing; see Condition 8 monthly reports
27(c)	Compile and report the details of the inspection logs, including any ongoing leachate seepage and pooling	1/23/2024; weekly	Ongoing; see weekly leachate inspection reports
27(d)	Measure and record quantities of leachate sent offsite for disposal/ treatment	1/18/2024; ongoing	Ongoing; see Condition 8 monthly reports

Condition No.	Key Action	Start Date/Deadline	Status
27(d)	Submit copies of leachate manifests to South Coast AQMD within 3 weeks of request	1/18/2024; as requested	Ongoing
27(d)	If Chiquita begins onsite leachate treatment, record on a weekly basis quantities of leachate collected and treated onsite	Ongoing	Ongoing
28	Operate and maintain the landfill gas and liquids systems with materials capable of handling gases/liquids at the temps measured. Utilize casing materials for elevated temp wells as agreed upon with the LEA	1/18/2024; ongoing	Ongoing
28	Provide information pertaining to installed equipment and specifications to SCAQMD upon request	1/18/2024; ongoing	Ongoing
29	Ensure proper capacity to accumulate leachate onsite and/or dispose of it at appropriate facilities	3/21/2024; ongoing	Ongoing
30	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
31	Notify South Coast AQMD on progress of procuring and installing cover	10/31/23; ongoing	Ongoing; see Condition 8 monthly reports
33	Expand and enhance current ambient air monitoring program pursuant to DPH's direction	9/7/2023; ongoing	Ongoing
33	Submit ambient air monitoring reports for DPH to South Coast AQMD	As needed	Ongoing
34(b)	Provide weekly data collected by the offsite monitors on Chiquita's Odor Mitigation webpage in downloadable format	2/16/2024; ongoing	Ongoing
34(b)(i)	Provide flags or other visual indicators of missing air monitoring or test data on the website and document the range of dates/times with missing or affected data and the reason for the missing or affected data	3/29/2024; ongoing	Ongoing
35	Provide updates to the QA/QC docs, a calibration log, and maintenance activities performed	1/18/2024; ongoing	Ongoing; see Condition 8

Condition No.	Key Action	Start Date/Deadline	Status
			monthly reports
35(a)	Provide South Coast AQMD with the same access as Chiquita to onsite and offsite monitoring equipment	1/18/2024; ongoing	Ongoing
35(a)	Provide South Coast AQMD list of appropriate PPE within 24 hours of request	1/18/2024; ongoing	Ongoing
36(b)	Increase the number of 24-hour canister sampling and analysis for VOCs at MS-06 through MS-12 to 3 times per week	3/21/2024; ongoing until microGC monitors are installed at MS-10 and MS-12	Ongoing
38	Take at least one representative sample of liquids from the Reaction Area and one from the bottom tanks and analyze per USEPA Method 624.1 for VOCs and TACs	1/18/2024; monthly	Ongoing
38	Post leachate analytical results on website and provide to South Coast AQMD	Within 1 week of receipt from contract lab	Ongoing
39	Maintain Odor Mitigation webpage; update weekly	9/7/2023; weekly	Ongoing
39	Translate Odor Mitigation webpage and reports into Spanish	10/6/2023; ongoing	Ongoing
40	Host community information meetings	9/14/2023; monthly based on receipt of NOV's	Ongoing
42	Implement additional mitigation measures while conducting non-exempt Rule 1150 excavation activities	When conducting non-exempt Rule 1150 excavation, until final approval of Rule 1150 landfill excavation plan	Ongoing
42(a)	Notify South Coast AQMD at least two days before and within five days after completion of excavation activities	When conducting non-exempt Rule 1150 excavation, until final approval of Rule 1150 landfill excavation plan	Ongoing
43	Maintain fresh trash odor mitigation measures during Unfavorable Wind Conditions	9/7/2023; ongoing	Ongoing
44	Maintain onsite MET station in the Reaction Area	10/31/2023; ongoing	Ongoing
45	Maintain and operate 1,000 feet or more of Semi-Permanent Vapor Odor Control in the Reaction Area	9/20/2023; ongoing	Ongoing

Condition No.	Key Action	Start Date/Deadline	Status
46, 47	Operate and maintain a landfill perimeter odor control misting system	9/7/2023; ongoing	Ongoing
51	Permit South Coast AQMD personnel to conduct inspections deemed necessary, including sample collection	1/18/2024; ongoing	Ongoing
51	Collect a sample of uncontrolled liquid observed during a South Coast AQMD inspection within 24 hours, submit for expedited testing for VOCs, and submit test results within 24 hours of receipt of results (but no later than 96 hours after collection)	3/21/2024; ongoing when South Coast AQMD observes uncontrolled liquid that may be leachate during an inspection	Ongoing
51	Provide South Coast AQMD with list of appropriate PPE upon request	1/18/2024; ongoing	Ongoing
51(a)	Maintain onsite at least two 5-gas monitors for regulatory personnel to use	3/21/2024; ongoing to the extent required by the health and safety plan	Ongoing
52	Host meetings between South Coast AQMD technical staff and Chiquita's technical consultants	1/18/2024; biweekly	Ongoing
54	Collect, convey, and store flare condensate separate from leachate; no mixing of flare condensate and leachate	3/21/2024; ongoing	Ongoing
65	Provide South Coast AQMD with a summary of leachate dewatering pump installation activities	3/29/2024; weekly	Ongoing; posted on Chiquita's website

Future Actions

Condition No.	Key Action	Start Date/Deadline	Status
53	Submit report on leachate tank numbers and quantities of liquid collected and treated	4/3/2024; weekly	
12(f)(iv)	Following each Reaction Committee meeting, prepare meeting summary and post on webpage	March 2024; monthly	
18	Revise dewatering guidelines and resubmit for approval	4/4/2024	
56	Conduct sampling and analysis of vapors in headspace of leachate tanks in #9 Top Deck Tank Farm	4/4/2024	
15(b)(i)	Submit an updated design and installation schedule incorporating the additional wells	4/18/2024	

Condition No.	Key Action	Start Date/Deadline	Status
	under Condition 15(a) and (b) and their associated piping		
56	Submit report of headspace tank sampling and analysis parameters and lab results to South Coast AQMD	4/18/2024	
66	Submit recommendations regarding installation of remote well pressure and temperature monitoring system	4/19/2024	
34(a)	Ensure that weekly benzene and live H ₂ S and methane data from the offsite monitors and/or 24-hour samples are posted on the webpage in graphical format with a dashed/dotted line for RELs	4/20/2024	
57	Submit expedited permit modification application for Landfill Gas Condensate and Leachate Collection/Storage System to increase liquid storage capacity	4/22/2024	
60	Submit expedited permit modification application for Landfill Gas Collection to include tie-in of the treatment system vapor vent lines	4/22/2024	
63	Submit schematic of current leachate treatment and storage system to South Coast AQMD	4/22/2024	
69	Submit workplan to restart leachate pumping to South Coast AQMD Hearing Board	4/22/2024	
12(g)(i)	Submit report on study of treatment of DMS and preventative mechanisms for DMS formation	4/30/2024	
36	Install and maintain continuous BTEX/VOC monitoring equipment at MS-10 and MS-12	5/1/2024	
12(g)(vii)	Develop a model to estimate the quantity of liquid left in the landfill and submit a report summarizing the model	5/21/2024	
61	Submit expedited permit modification application for Landfill Gas Flare System (Flare Nos. 1 and 2) to include combustion vapor from treatment system	5/21/2024	
62	Submit expedited permit modification application for Landfill Gas Flares System (Flare No. 3) to include combustion vapor from treatment system	5/21/2024	
68	Install pressure gauges on each leachate tank	5/31/2024	

Condition No.	Key Action	Start Date/Deadline	Status
68	Monitor and record the differential pressure of each leachate tank, tank identification number, date and time of the reading, and personnel	5/31/2024; daily	
50	Provide quarterly updates to the Condition 50 workplan	6/13/2024; quarterly	
58	Submit expedited permit modification application for Zeeco TOX	6/21/2024	
59	Submit expedited permit modification application for Landfill Gas Condensate and Leachate Treatment System for hazardous waste treatment	6/21/2024	
66	Finalize contracts to install and operate remote well pressure and temperature monitoring system	6/21/2024	
12(g)(vi)	Prepare and submit to South Coast AQMD a report of the health impacts from ongoing and long-term exposure to H ₂ S or other speciated sulfur compounds and other HAPs	8/1/2024	
66	Install and operate remote well pressure and temperature monitoring system	10/22/2024	
15(b)	Expedite the installation of additional gas wells and achieve a vertical well density of an average of three operational wells per acre within the data-driven reaction area such that there are at least two wells per acre within any individual grid	1/6/2025	
18	Implement revised dewatering guidelines to the maximum extent feasible	Within 7 days of approval of revised guidelines	
4	Once Flare 4 is in operation, prioritize Flare 3 and Flare 4 over Flare 1 and Flare 2	Once Flare 4 is in operation	
12	Provide new Reaction Committee member information to South Coast AQMD	TBD	
34	Provide South Coast AQMD access to all real-time continuous monitoring data for TRS and TAC at enhanced monitors	Within 5 calendar days after enhanced monitors are brought online	
12(a)(iv)	Add Reaction Committee member relating to public health	TBD	
12(i)	Conduct second flux chamber study	No later than 90 days after South Coast AQMD approval of protocol	

Condition No.	Key Action	Start Date/Deadline	Status
12(i)	Submit report on second flux chamber study	No later than 90 days after South Coast AQMD approval of protocol	
15(d)	Notify South Coast AQMD at least 1 week in advance when an additional well or set of wells and associated piping will be installed	Following installation of Condition 15(a) and (b) wells	
15(d)	Provide updates to the design and schedule for the additional wells	Following installation of Condition 15(a) and (b) wells	
15(j)	Replace any wells in the Reaction Area which are damaged, blocked, pinched, or have temps exceeding 145 degrees F	Following installation of Condition 15(a) and (b) wells; as needed	
15(j)	Notify South Coast AQMD of proposed installation schedule for replacement of damaged, blocked, pinched, or high temp wells	Following installation of Condition 15(a) and (b) wells; within 7 days of discovery	
15(j)	Install replacement well within 7 days of notification; update South Coast AQMD every 7 days until installation is complete	Following installation of Condition 15(a) and (b) wells; within 7 days of notification	
15(k)	Operate gas extraction wells with less than 3% oxygen and follow BMPs to keep oxygen below 5% in interior wells	Once additional/adequate gas extraction capacity is installed	
15(l)	Install well boots seals on all wells in Reaction Area	TBD	
15(m)	Submit semi-annual as-built drawings in duplicate to South Coast AQMD	TBD; semi-annually	
32(b)(ii)	Complete additional air modeling study (if recommended) and submit final written report	No later than 150 days after South Coast AQMD approval of protocol	
36(a)	Make continuous BTEX/VOC monitoring data available on Chiquita's Odor Mitigation webpage	Upon installation	
55	Conduct source testing and obtain South Coast AQMD approval prior to injection of flare condensate	Prior to injection of flare condensate	
55	If injection of flare condensate begins, maintain and submit records of condensate sampling/analysis and injection flows	If injection of flare condensate begins; monthly	

Attachment H

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 (Mitigation Measure #1B)	In progress
1B	Install temperature monitoring devices in the reaction area.	See weekly updates and related reports on Chiquita's website	In progress; see weekly updates and related reports on Chiquita's website
2A	Install 30-mil geosynthetic cover over the Reaction Settlement Area and any well showing signs of a reaction.	April 26, 2024	In progress; see weekly updates and related reports on Chiquita's website
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.	Ongoing	Ongoing; see weekly reports on Chiquita's website
2B	Revise written plan for documenting and tracking cover issues to include a log with a summary and map to track documented fissures and tension cracks and identify trends, and to include methods to track instability obscured by the geosynthetic cover.	In progress	In progress
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.	February 22, 2024	Completed

3	Perform additional slope stability analyses as enumerated in the LEA's March 22, 2024 letter to Chiquita.	In progress	In progress
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

Attachment I

Work Required by EPA UAO

Completed Work

Paragraph #	Key Action	Start Date/Deadline	Status
94	Request a conference with EPA to discuss UAO or notify EPA that Chiquita intends to submit written comments or a statement of position in lieu of requesting a conference.	February 23, 2024	Completed
98	Notify EPA of Chiquita's intent to comply with UAO.	February 26, 2024	Completed
18	Designate a Project Coordinator responsible for administration of Work under UAO.	February 28, 2024	Completed
6	Provide a copy of UAO to all contractors, subcontractors, laboratories, and consultants that are retained to conduct or monitor any portion of the Work performed pursuant to UAO.	March 4, 2024	Completed
17	Notify EPA of the names, contact info, and qualifications of the contractors, subcontractors, consultants, and laboratories to be used in carrying out the Work.	March 27, 2024	Completed
22(b), (c)	Provide a Master Work Plan, including the following plans: -Leachate Management Plan -Soil Reaction Break/Barrier Plan -Cover Installation Plan -Slope Stability Analysis work plan -Collection of temperature data in/around Reaction Area -Air Monitoring Plan -Off-Site Migration Prevention Plan	March 27, 2024	Completed
24	Submit a Sampling and Analysis Plan, including a Field Sampling Plan and Quality Assurance Project Plan.	March 27, 2024	Completed
25	Develop and submit a Health and Safety Plan.		Completed

Ongoing Work

Paragraph #	Key Action	Start Date/Deadline	Status
6	Condition all contracts and agreements with contractors, subcontractors, laboratories, or consultants in connection with the UAO, on compliance with terms of the UAO. Ensure their compliance with UAO.	Ongoing	Ongoing
17	Notify EPA of any additional retained contractors or subcontractors.	At least 5 days prior to commencement of Work	As needed; ongoing

Paragraph #	Key Action	Start Date/Deadline	Status
22(a)	Immediately store, transport leachate solid and/or hazardous waste in accordance with RCRA, 42 U.S.C. 6900, et seq., and associated regulations. All hazardous waste shall be disposed of at a TSD preapproved by EPA.	February 26, 2024; ongoing	Ongoing
28	Prior to shipping hazardous substances, pollutants, or contaminants off site, obtain a prior determination from EPA and comply with RCRA and CERCLA requirements.	Prior to shipping hazardous substances, pollutants, or contaminants off site	As needed; ongoing
28	Provide written notice of out-of-state waste shipments to the appropriate state environmental official and to EPA. Notify state official and EPA of any major changes in shipment plan.	Prior to shipping waste material out of state	As needed; ongoing
28	Comply with the requirements of Paragraph 28(c) regarding shipment of Investigation Derived Waste off site.	Prior to shipping Investigation Derived Waste off-site	As needed; ongoing
39	Take all appropriate action to minimize emergency/threat.	In the event of an emergency or an action or occurrence that may present an immediate threat to human health and the environment	As needed; ongoing
39	Submit written notification of emergency/threat.	Within 3 days of discovery	As needed; ongoing
39	Submit and implement a plan to mitigate threat.	As needed	As needed; ongoing
40	Provide notification of a release that triggers release notification pursuant to CERCLA Section 103 or EPCRA Section 304 pursuant to Paragraph 40.	In the event of a release that triggers release notification pursuant to CERCLA or EPCRA	As needed; ongoing
41, 42	Use quality assurance, quality control, and other technical activities and chain of custody procedures for all samples. Ensure all laboratories meet the requirements of Paragraph 42 of the UAO.	Ongoing	Ongoing
49	All results of sampling, testing, modeling, or other data generated by Chiquita, or on Chiquita's behalf, must be validated by Chiquita and submitted to EPA promptly upon receipt.	Upon receipt of results	Ongoing
50	Notify EPA in advance of any sample collection activity.	Not less than 7 days prior to any sampling	Ongoing

Paragraph #	Key Action	Start Date/Deadline	Status
59-62	Preserve all documents/information, including raw data, relating to the Work, or relating to any solid waste or hazardous waste found at the Site, for 5 years following termination of UAO.	February 26, 2024; ongoing	Ongoing
59-62	Acquire and retain copies of all documents that related to the Site that are in possession of Chiquita employees, agents, accountants, contractors, or attorneys.	February 26, 2024; ongoing	Ongoing
73, 75	Ensure that Chiquita and its contractors and subcontractors satisfy all applicable laws and regulations regarding the provision of employer's liability insurance and worker's compensation insurance for all persons performing Work.	February 26, 2024; ongoing	Ongoing
88	Notify EPA Project Coordinators of any delay or anticipated delay in performing any requirement of the UAO	Within 48 hours after Chiquita first knew or should have known of a delay	As needed; ongoing
88	Provide written notification of delay in accordance with Paragraph 88	Within 7 days after notifying EPA of delay	As needed; ongoing

Future Work

Paragraph #	Key Action	Start Date/Deadline	Status
17	Submit a copy of each proposed contractor's QMP and demonstrate their compliance with ASQ/ANSI E4:2014.	March 27, 2024; extension requested	
76-79	Submit initial cost estimates.	April 26, 2024	
80-86	Secure financial assurance and submit proposed financial assurance mechanisms.	Within 30 days of EPA approval of cost estimates	
80-86	Secure and submit all executed/finalized financial assurance mechanisms.	April 26, 2024, or 30 days after approval of financial assurance, whichever is later	
73	Secure insurance as required by the UAO. Provide EPA with certificates of such insurance and a copy of each insurance policy, naming EPA as an additional insured, prior to commencing Work and annually thereafter on February 26.	Prior to commencing Work; annually	

Paragraph #	Key Action	Start Date/Deadline	Status
73, 75	Certify to EPA that Chiquita's contractors and subcontractors have obtained the required insurance.	Prior to commencing Work	
26	Submit monthly progress reports on actions undertaken pursuant to the UAO.	Monthly, concerning work undertaken pursuant to UAO from date of receipt of EPA approval of Master Work Plan; requested clarification of when first progress report is required to be submitted	
53	Use best efforts to obtain all necessary access agreements.	As needed	
76-79	Submit revised cost estimates.	Annually and as needed	
80-86	Revise financial assurance and financial assurance mechanisms.	As needed	
27	Submit a final report summarizing actions taken to comply with UAO.	Within 15 days after completion of all Work required by UAO	
59-62	Notify EPA that documents and information are available for inspection and provide copies upon request.	After the end of the 5-year retention period and 90 days before any documents or information is destroyed	

Attachment J

INVESTIGATIVE ORDER NO. R4-2024-0010

**CALIFORNIA WATER CODE SECTION 13267 AND 13383 ORDER
TO PROVIDE A TECHNICAL REPORT FOR
SURFACE AND SUBSURFACE INVESTIGATION**

**DIRECTED TO
WASTE CONNECTIONS, INC. AND CHIQUITA CANYON, LLC**

**CHIQUITA CANYON LANDFILL
CASTAIC, CALIFORNIA
(FILE NO. 67-020, ORDER NO. R4-2018-0172, GEOTRACKER GLOBAL ID.
L10003464243)**

**ON
March 20, 2024**

The California Regional Water Quality Control Board, Los Angeles Region (Los Angeles Water Board) makes the following findings and issues this order to provide a technical report pursuant to California Water Code (Water Code) Sections 13267 and 13383 (Order). The Order requires that Waste Connections, Inc. and Chiquita Canyon, LLC, which is a wholly-owned subsidiary of Waste Connections, Inc., (hereinafter together as the Discharger) submit additional information for an investigation of potential surface water and groundwater impacts due to current conditions at the Chiquita Canyon Landfill (Landfill), located at 29201 Henry Mayo Drive, Castaic, California, as observed during the Los Angeles Water Board inspections conducted on October 3, 2023, November 2, 2023, January 29, 2024, and February 20, 2024.

1. The Landfill is a Class III municipal solid waste (MSW) landfill and is owned and operated by Chiquita Canyon LLC, which is a wholly-owned subsidiary of Waste Connections, Inc. The Landfill is a 639-acre waste management facility, of which 400 acres are designated for landfill operations. It is roughly divided into six fill areas: Primary Canyon, Canyons A, B, C, and D, and the Main Canyon. Primary Canyon (54 acres) is unlined and Canyon B (15 acres) is lined with a clay bottom and flexible membrane liner on the side slopes. Both have been filled to capacity. The remaining fill areas are equipped with a liner and leachate collection and removal system (LCRS). The Landfill is actively accepting MSW in a lined area.
2. The Landfill started receiving wastes in 1974 under operation by the Chiquita Canyon Landfill Company. Operation of the Landfill was transferred to Laidlaw Waste Systems, Inc., in 1987, Allied Waste Services, Inc., in 1996, and USA Waste Services Company (aka Waste Management) in 1997. In January 1999, Republic Services acquired the Landfill from Waste Management. In April 2009, the Chiquita Canyon Landfill, LLC acquired the Landfill from Republic Services.

3. The Landfill was previously regulated by the Los Angeles Water Board under Waste Discharge Requirements (WDRs) Order No. 84-8 for the discharge of inert and non-hazardous solid wastes; Order No. 84-8 was adopted on January 23, 1984, and amended by Order No. 87-28 on March 23, 1987, to revise the waste disposal fill rate from 2,000 tons per day to 5,000 tons per day. On May 22, 1989, the Los Angeles Water Board adopted Order No. 89-52 which replaced Order Nos. 84-8 and 87-28. On November 2, 1998, the Los Angeles Water Board adopted WDR Order No. 98-086, which terminated Order No. 89-52 and included the vertical and lateral expansion of the Landfill as approved by the Los Angeles County Board of Supervisors in the Conditional Use Permit (CUP) No. 89-081(5) on May 20, 1997.
4. The Landfill is currently regulated under the WDRs contained in Order No. R4-2018-0172, which was adopted by the Los Angeles Water Board and became effective on December 13, 2018 and includes a MRP (CI 6231). Order No. R4-2018-0172 superseded Order No. 98-086 and updated requirements for operational and maintenance activities at the Landfill and included expansion of the Landfill as approved by Los Angeles County Board of Supervisors in the Conditional Use Permit (CUP) No. 200400042 in 2017.
5. Stormwater runoff from the Landfill is separately regulated under the National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Industrial Activities, NPDES No. CAS000001 (Industrial General Permit, WDID No. 4 19I022488, Notice of Intent (NOI) dated January 26, 2015); stormwater discharges are directed to on-site sedimentation basins which serve to reduce sediments and other pollutants from the discharge. The Landfill is also currently enrolled under the NPDES General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities, NPDES No. CAS000002 (Construction General Permit, WDID No. 419C397764, NOI dated May 20, 2022) for the Chiquita Canyon Landfill Entry Gates project.
6. The Landfill is located within the Santa Clara River Hydrologic Subarea which is part of the Santa Clara-Calleguas Hydrologic Unit. It is surrounded on three sides by ridges that restrict inflow to seasonal precipitation. The resultant groundwater flows in alluvium and in the sedimentary bedrock of the Saugus and the Pico formations, generally following the surface topography and exiting the canyon to the south. Most of the site drains south toward the Santa Clara River flood plain, which flows along the south side of State Route 126. The northeast portion of the site drains eastward into Castaic Creek, approximately 3,000 feet from the site boundary, which then flows south toward the Santa Clara River. Beneficial uses for the Santa Clara River and Castaic Creek include Municipal and Domestic Supply (MUN); Industrial Service

Supply (IND); Industrial Process Supply (PROC); Agricultural Supply (AGR); Ground Water Recharge (GWR); Freshwater Replenishment (FRSH); Warm Freshwater Habitat (WARM); Wildlife Habitat (WILD); Rare, Threatened, or Endangered Species (RARE); Water Contact Recreation (REC-1); and Non-contact Water Recreation (REC-2). Beneficial uses for the underlying groundwater basins include MUN, IND, PROC, and AGR. The Landfill is located outside of a 100-year flood plain, according to the Federal Emergency Management Agency, Flood Insurance Rate Map.

7. Land uses surrounding the Landfill include primarily open space to the north and rural residential development to the west and northwest. The closest residential area is located approximately 500 feet from the northwest property boundary and 1,200 feet from the Landfill footprint. Intervening topography prevents views of the operating landfill from the residential area. The property immediately west and south of the Landfill is either vacant or used for agricultural activities. The property immediately across State Route 126 from the Landfill has been permitted for residential development, including an elementary school.
8. The Landfill is currently under a corrective action program (CAP) as required under the WDRs, which began in 1998, for the detection of volatile organic compounds (VOCs) at three groundwater monitoring wells, DW-1 near Primary Canyon, DW-3 at Canyon B, and DW-20 near Canyon D. VOCs detected in groundwater at the impacted monitoring wells include 1,1-dichloroethane (1,1-DCA), 1,2-dichloroethane, 1,4-dichlorobenzene, benzene, cis-1,2-dichloroethene, dichlorofluoromethane, methylene chloride, trichloroethylene (TCE), perchloroethylene (PCE), and vinyl chloride. TCE, PCE, and 1,1-DCA are the constituents most frequently detected. In 2016, DW-20 was added to the list of CAP wells, and was abandoned and replaced with well DW-29 in 2018 due to an expansion of the Landfill. In 2005, well DW-16, which is located at the northern edge of the Primary Canyon unit, was enrolled under an evaluation monitoring program for the detection of VOCs (TCE and PCE) in the well. It was determined that VOC pollution at the Landfill was caused by the migration of landfill gas (LFG) to groundwater. The CAP includes an enhanced LFG collection and control system aimed at reducing subsurface gas migration to groundwater. The CAP measures appear to be effective since VOC concentrations at the impacted wells have been declining over time, most to below detection limits. Data from the 2023 annual report submitted in January 2024 reported that VOCs were not detected in wells DW-1 and DW-29, some VOCs detected at trace concentration in DW-16, and dichlorodifluoromethane was detected in well DW-3 at 2.1 parts per billion.
9. In early July 2023, Los Angeles Water Board staff was notified by the Los Angeles County Local Enforcement Agency (LEA) of a potential LFG problem at the site due

to an ongoing landfill reaction. On July 21, 2023, Los Angeles Water Board staff contacted the Discharger, via email, concerning the reaction, who then provided information on reaction landfills in the Country. Multiple odor complaints from the public were received by the South Coast Air Quality Management District (SCAQMD). The LEA and other regulatory agencies had been working with the Discharger to understand the cause of increased LFG levels and to bring the Landfill into compliance with requirements from the regulatory agencies. The reported odors appeared to be coming from the northwestern portion of the Main Canyon of the Landfill, where the LFG was measured to be unusually hot and contained larger amounts of condensate than normal. The Discharger's representative, in a telephone conversation, indicated to Los Angeles Water Board staff that a portion of the Landfill was producing large amounts of gas containing a large amount of water and dimethyl sulfide (DMS); the hot wet gas was harmful to landfill flares which operate optimally when the gas is dry. Additionally, an area of approximately 20 acres had experienced subsidence of up to 16 to 18 feet, giving an appearance of a crater. This portion of the landfill is now being referred to as the Reaction Area. During a telephone conversation in July, the Discharger also indicated that leachate production increased from about 30,000 gallons per day (GPD) to around 100,000 GPD. However, the Discharger's representative indicated there was too much water in the gas for a fire to occur.

10. On September 28, 2023, the Los Angeles County LEA informed Los Angeles Water Board staff of leachate seepage observed at the Landfill during the LEA's September 19, 2023, inspection. The Discharger indicated to the LEA that the leachate seepage was caused by the reaction in the Reaction Area and was collecting the leachate in onsite leachate storage tanks before disposing the leachate offsite.
11. On October 3, 2023, Los Angeles Water Board staff conducted an inspection of the Landfill, during which staff observed a leachate seep at the north-western portion of the Main Canyon that flowed from the edge of the Landfill to an onsite concrete drainage channel that leads to the stormwater sedimentation basin at the southern border of the Landfill. The Discharger had placed several soil berms along the onsite concrete channel to capture and pump off the leachate before it reached the sedimentation basin. The leachate seepage had not been previously reported to the Los Angeles Water Board by the Discharger.
12. On October 17, 2023, Los Angeles Water Board staff received an email from the public stating leachate had been leaking out of the northwest side of the landfill.
13. On November 2, 2023, a joint inspection of the Landfill was conducted by multiple regulatory agencies, including SCAQMD, the LEA, and Los Angeles Water Board staff. Los Angeles Water Board staff observed that the leachate seep, as noted during the October 3, 2023 inspection, was still occurring.

14. On November 22, 2023, the Los Angeles Water Board issued a Notice of Violation (NOV) to the Discharger, for violations of the WDRs observed during the October 3, 2023 inspection. The NOV cited violations of Sections F.6 and B.3 of Order No. R4-2018-0172 for the operation of a leachate and landfill-gas condensate containment system that is inadequate to prevent commingling of leachate and gas condensate with surface water run-on and runoff during a rain event, and the failure to report the leachate seep that was observed at the landfill during the inspection within 24 hours of discovery. The NOV requested the Discharger submit a written response to the Los Angeles Water Board to include corrective actions taken and actions planned to mitigate conditions of the Landfill in violation of the WDRs by December 22, 2023. Additionally, the NOV requested the Discharger submit a final report to the Los Angeles Water Board to demonstrate that the Landfill complies with the WDRs by February 20, 2024.
15. On December 22, 2023, the Discharger submitted a Response to the NOV. The response provided the following updated information:
 - a. The Discharger is installing extraction wells in the Reaction Area to remove leachate.
 - b. The Discharger is installing a French drain along the outer edge of the liner in the Reaction Area to capture leachate before it exits the Landfill cell.
 - c. The Discharger is increasing the Landfill's leachate storage capacity.
 - d. The Discharger is performing regular inspections of the slopes west and north of the Reaction Area.
16. The Final Report in response to the NOV, received on February 20, 2024, describes the difficulties of the reaction and how the Discharger is managing leachate and seeps, dewatering the Reaction Area with pumps and a French drain, placing a geosynthetic cover over the entire Reaction Area, continuing to add gas extraction wells, and conducting a minimum of two inspections a day of the Reaction Area.
17. On December 29, 2023, the Discharger submitted a notification to Los Angeles Water Board staff regarding a leachate seep discovered to have reached an onsite concrete channel at the west perimeter road on December 22, 2023, following a heavy rain event. The Discharger indicated that pooling of water on top of a scrim (a temporary cover over the Reaction Area) pushed aside sandbags used to weigh down the scrim at the bottom of the Landfill slope, washed out sections of the perimeter road, and caused the leachate underneath to be forced out of the scrim instead of flowing along its normal path downhill towards a collection sump. As a result, portions of the leachate reached the onsite concrete-drainage channel. Following the discovery, the

Discharger installed a check dam on the onsite concrete drainage channel to contain and pump out leachate from the onsite concrete drainage channel using a vacuum truck, as well as rainwater off the scrim to prevent further pooling. The Discharger subsequently implemented additional corrective measures, including repair of the perimeter road and replacement of sandbags, pressure-washing of the onsite concrete channel, and installation of a 10-foot berm at the base of the western slope to assist with directing rainwater off the scrim. The Discharger took samples on December 28, 2023 from the south stormwater sedimentation basin to test for leachate parameters; the analytical data showed ammonia (as N) at 4.7 milligrams per liter (mg/L), p-cresol and phenol at 0.016 and 0.015 mg/L, respectively, and arsenic, chromium, iron, and zinc at 0.021, 0.015, and 0.14 mg/L, respectively. Stormwater samples collected by the Discharger on December 22 and December 28, 2023 showed detections of iron, biochemical oxygen demand, total suspended solids, oil and grease, and E. Coli above benchmarks, with E. Coli detected at 650,000 MPN/100 mL.

18. On January 29, 2024, Los Angeles Water Board staff from the Stormwater Unit conducted an inspection at the Landfill to evaluate compliance with the Industrial General Permit. Los Angeles Water Board staff observed a leachate seepage area located across an onsite concrete drainage channel. Landfill personnel were pressure-washing the channel and had placed a soil check dam downgradient of the channel to capture wastewater; a vacuum truck was removing the wastewater from the channel. The onsite concrete drainage channel activities occurred upgradient and in close proximity to the sedimentation basin and where the channel discharges into the basin. Implementation of best management practices (BMP) to prevent migration of leachate and runoff into the channel was inadequate.
19. On February 4, 2024, heavy rain events occurred at the Landfill. Los Angeles Water Board staff requested information and photographs of additional BMPs implemented onsite to prevent leachate migration; however, the Landfill did not provide this information.
20. On February 20, 2024, Los Angeles Water Board staff conducted a joint inspection with multiple regulatory agencies; leachate seepage was still occurring in the same area as observed during the January 29, 2024 inspection. In addition, no additional measures or adequate BMPs were observed in place between the drainage channel and leachate seepage area to prevent leachate migration; muddy water was observed in the channel. The outfall of the south sedimentation basin was also observed discharging water.

21. During the review of past WDR submittals, Los Angeles Water Board staff's findings during previous inspections, information provided by other regulatory agencies, the Discharger's December 22, 2023 response to the NOV, and subsequent failures of the short-term measures to prevent leachate from commingling with stormwater runoff, Los Angeles Water Board staff has identified a list of additional information and documents that are needed to further investigate and assess potential impacts to groundwater and surface water due to the current conditions at the Landfill.
22. Water Code section 13267, subdivision (b)(1), states, in part:

“In conducting an investigation specified in subdivision (a), the regional board may require that any person who has discharged, discharges, or is suspected of having discharged or, discharging, or who proposes to discharge waste within its region, or any citizen or domiciliary, or political agency or entity of this state who has discharged, discharges, or is suspected of having discharged or discharging, or who proposes to discharge waste outside of its region that could affect the quality of waters within its region shall furnish, under penalty of perjury, technical or monitoring program reports which the regional board requires. The burden, including costs, of these reports shall bear a reasonable relationship to the need for the reports and the benefits to be obtained from the reports. In requiring those reports, the regional board shall provide the person with a written explanation with regard to the need for the reports and shall identify the evidence that supports requiring that person to provide the reports.”
23. Water Code section 13383, subdivision (a), states, in part:

“The state board or a regional board may establish monitoring, inspection, entry, reporting, and recordkeeping requirements ... for any person who discharges, or proposes to discharge, to navigable waters...”
24. This Order requires the Discharger to prepare and submit a technical report to provide additional information related to Chiquita Canyon Landfill's plan to return to compliance with its WDRs and NPDES permits. The information is needed for the Los Angeles Water Board's investigation of potential impacts to waters of the State and the United States caused by the Landfill reaction and resulting excessive leachate production. The chemicals in Landfill leachate, if discharged to surface or groundwater in excess of water quality objectives, could pose a serious risk to the beneficial uses of those waters. Therefore, more information on the potential discharge of Landfill leachate is needed. The Discharger must submit a complete report as required by this Order. The Los Angeles Water Board may reject the report if it is deemed incomplete or if the Los Angeles Water Board requires revisions to the report under this Order. As set forth in more detail below, the burdens, including the costs, of preparing this

report bear a reasonable relationship to the need for the report and the benefits to be obtained from the report.

25. The report required by this Order pursuant to Water Code section 13267 seeks information that is or should be in the possession of the Discharger and the installation of three additional groundwater monitoring wells. The cost for the Discharger to comply with this Order is expected to be less than \$300,000. Given the intended benefits the report is expected to generate, the burden of producing the report required by this Order bears a reasonable relationship to the need for the report and the benefits to be gained from the report.
26. The issuance of this Order is an enforcement action by a regulatory agency and is categorically exempt from the provisions of the California Environmental Quality Act (CEQA) pursuant to California Code of Regulations, title 14, section 15321, subdivision (a)(2). This Order requires submittal of a technical report. It is unlikely that compliance with this Order could result in physical changes to the environment. If the implementation of this Order may result in significant impacts on the environment, the appropriate lead agency will address the CEQA requirements prior to approval of any such action.
27. Any person aggrieved by this action of the Los Angeles Water Board may petition the State Water Board to review the action in accordance with Water Code section 13320 and California Code of Regulations, title 23, sections 2050, et seq. The State Water Board must receive the petition by 5:00 p.m., 30 days after the date of this Order, except that if the thirtieth day following the date of this Order falls on a Saturday, Sunday, or state holiday, the petition must be received by the State Water Board by 5:00 p.m. on the next business day. Copies of the law and regulations applicable to filing petitions may be found at: http://www.waterboards.ca.gov/public_notices/petitions/water_quality or will be provided upon request.

THEREFORE, IT IS HEREBY ORDERED that the Discharger, pursuant to Water Code section 13267, subdivision (b), is required to submit the following by April 22, 2024, except as otherwise noted below:

1. A technical report containing the following items:
 - a. A workplan to install a groundwater well south of the Main Canyon portion of the Landfill, down gradient of the Reaction Area and north of well DW-29. The well shall be placed to monitor for a possible leachate release due to either a compromised liner or the overtopping of leachate to the ground surface.

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- b. The workplan shall also include installation of a groundwater monitoring well down gradient of the southern stormwater sedimentation basin.
- c. The workplan shall also include installation of an offsite groundwater monitoring well, between the southern border of the Landfill and the Santa Clara River.
- d. These new wells and existing wells DW-9, DW-15, DW-16, DW 17 and DW-29 will be placed in an evaluation monitoring program; therefore, the monitoring frequency for the most current list of Monitoring Parameters (MPars) shall be quarterly. If, after two years following resolution of the elevated temperature condition in the Reaction Area, the wells have not had any detections, the Discharger may request that wells be placed into a detection monitoring program (DMP), as approved by the Los Angeles Water Board Executive Officer or their delegate.

Quarterly Monitoring, Reporting Period and Report Due Dates

Monitoring Report	Reporting Period	Report Due Date
1 st Quarter	January 1 – March 31	April 15
2 nd Quarter	April 1 – June 30	July 15
3 rd Quarter	July 1 – September 30	October 15
4 th Quarter	October 1 – December 31	January 15

- e. In addition to the most current list of MPars in the MRP, a full scan of Appendix II Constituents in 40 CFR, part 258 shall also be performed at the new groundwater monitoring wells within thirty days of installation. Following the initial sampling event, the new wells together with the existing wells identified in item d above will be placed in biennial testing for Appendix II Constituents.
- f. A quarterly assessment, monitoring, and reporting of the sampling results from the new groundwater monitoring wells and the integrity of the bottom liner and LCRS within the Reaction Area.

Pursuant to Water Code section 13383, submit the following:

- g. For storms that produce a discharge into the sedimentation basin, a post-storm event assessment and report on the effectiveness of the geosynthetic cover that will be installed over a portion of the area impacted by the reaction to prevent leachate from commingling with stormwater until the elevated Landfill temperature condition has resolved. This report is due 30 days after the first day of the storm event that produces a discharge.

- h. A report documenting implementation, operation and maintenance of BMPs and any other measures preventing leachate migration with stormwater runoff into onsite drainage channels, drain inlets, and inlets to the south sedimentation basins.
 - i. The Discharger shall update its Storm Water Pollution Prevention Plan and Monitoring Implementation Plan (SWPPP) as required by Industrial General Permit to incorporate new BMPs and enhanced discharge monitoring as required by this Order. An updated SWPPP shall be uploaded to SMARTs no later than April 19, 2024.
 - j. The Discharger must sample and submit the analysis of any and all discharges into and out of the south sedimentation basin. Analytes shall include parameters identified in the effluent limitation guidelines in Subchapter N, Subpart B—RCRA Subtitle D Non-Hazardous Waste Landfills, Mvars, parameters the Discharger is required to sample per the Industrial General Permit including TMDL related requirements in Attachment E, and Appendix II constituents. All results must be submitted to the Los Angeles Water Board within 30 days of the first day of the discharge event.
2. The above items shall be electronically submitted to:
- Douglas Cross
Los Angeles Regional Water Quality Control Board
Email: douglas.cross@waterboards.ca.gov
3. Pursuant to Water Code section 13268, subdivision (a), any person who fails to submit reports in accordance with the Order is guilty of a misdemeanor. Pursuant to Water Code section 13268, subdivision (b)(1), failure to submit the required technical report described above by the specified due date(s) may result in the imposition of administrative civil liability by the Los Angeles Water Board in an amount up to one thousand dollars (\$1,000) per day for each day the technical report is not received after the above due date.
4. Pursuant to Water Code section 13385, subdivision (a)(3), a violation of a requirement established by Water Code section 13383, may result in the imposition of administrative civil liability by the Los Angeles Water Board in an amount up to ten thousand dollars (\$10,000) per day for each day the technical report is not received after the above due date. These civil liabilities may be assessed by the Los Angeles Water Board for failure to comply, beginning with the date that the violations first occurred, and without further warning.

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5. The Los Angeles Water Board, under the authority given by Water Code section 13267, subdivision (b)(1), requires the Discharger to include a perjury statement in all reports required by this Order. The perjury statement shall be signed by a senior authorized representative of the Discharger (not by a consultant). The perjury statement shall be in the following format:

“I, [NAME], certify under penalty of law that this document and all attachments were prepared by me, or under my direction or supervision, in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.”

SO ORDERED.

Jenny Newman
Assistant Executive Officer

March 20, 2024
Date