



August 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
csaucillo@dpw.lacounty.gov

Re: Chiquita Canyon, LLC's Monthly Update to the Integrated Waste Management Task Force

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 June 2024. This letter serves as Chiquita's monthly update for July 2024.

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 sixteen 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 July 2 to July 31, 2024. Copies of these NOVs are provided in Attachment A.

- On July 1, 2024, Chiquita received an NOV from DRP under CUP Condition 23. This NOV is provided in Attachment B.

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 C. Detailed information on Chiquita's implementation of the June 6, 2024 Compliance Order issued by the LEA, which incorporates the CalRecycle-recommended mitigation measures from the LEA's November 21, 2023 letter and subsequent correspondence and communications with the LEA discussed in prior reports, can be found in the chart provided in Attachment D. Detailed information on Chiquita's implementation of the EPA Unilateral Administrative Order ("UAO") can be found in the chart provided in Attachment E.

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 NOV's issued by SCAQMD inspectors as a result of the landfill reaction, alleging violations of SCAQMD Rule 402 and Health & Safety Code section 41700. This Stipulated Order has since been modified on January 17, March 21, and April 24, 2024.

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 C.

July 1, 2024 DRP NOV

On July 1, 2024, DRP issued Chiquita an NOV alleging violations of CUP Condition 23. Specifically, the NOV alleges that Chiquita violated the average daily tonnage capacity and the facility annual maximum capacity for municipal solid waste in 2023. Chiquita is discussing this NOV with DRP. As required by the NOV, on July 31, 2024, Chiquita submitted a compliance plan to address the alleged violations for the remainder of 2024.

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

Regards,



Steve Cassulo
District Manager
Chiquita Canyon, LLC

Attachments: A – Rule 402 NOV's from SCAQMD
B – July 1, 2024 DRP NOV
C – Chart of Chiquita's Implementation of the Stipulated Order for Abatement
D – Chart of Chiquita's Implementation of the LEA's Compliance Order
E – Chart of Chiquita's Implementation of the EPA UAO

cc: David Nguyen, Public Works

Attachment A



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

P 80950

NOTICE OF VIOLATION

DATE OF VIOLATION		
Month:	Day:	Year:
07	02	2024

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

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

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

DESCRIPTION OF VIOLATIONS

#	Authority*	Code Section or Rule No.	SCAQMD Permit to Operate or CARB Registration No.	Condition No. (If Applicable)	Description of Violation
1	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	RULE 402			FOR DISCHARGING SUCH QUANTITIES OF AIR CONTAMINANTS TO CAUSE INJURY, DETRIMENT, NUISANCE OR ANNOYANCE TO A CONSIDERABLE NUMBER OF PERSONS
2	<input type="checkbox"/> SCAQMD <input checked="" type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	CAL HAS 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 ROSAZIO	Date Notice Served: 07-02-2024
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: <input checked="" type="checkbox"/> In Person <input checked="" type="checkbox"/> Certified Mail
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VIOLATOR'S COPY



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

P 80630

NOTICE OF VIOLATION

DATE OF VIOLATION		
Month:	Day:	Year:
07	03	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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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 checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	<i>41700</i>			<i>For discharging such quantities of air contaminants to cause injury, detriment, nuisance or annoyance to a considerable number of persons.</i>
3	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
4	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
5	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				

Served To: <i>Steve Cassuto</i>	Phone: <i>661 371-9214</i>	Served By: <i>Karen Woullard</i>	Date Notice Served: <i>07/03/2024</i>
Title: <i>District Manager</i>	Email: <i>Steven.Cassuto@wasteconnections.com</i>	Phone No: <input checked="" type="checkbox"/> 909-396-2285 <input type="checkbox"/> 310-233-	Email: <i>KWoullard@aqmd.gov</i>

*Key to Authority Abbreviations:

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

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

Method of Service:

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VIOLATOR'S COPY



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

P 80025

NOTICE OF VIOLATION

DATE OF VIOLATION		
Month	Day	Year
07	05	2024

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

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

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

Served To:	Steve Cassido	Phone:	661 371 9214	Served By:	Daniel Rosas	Date Notice Served:	07/05/2024
Title:	District Manager Waste Connections	Email:	Steve Ca@wasteconnections.com	Phone No:	<input checked="" type="checkbox"/> 909-396-2080 <input type="checkbox"/> 310-233-	Email:	drosas@aqmd.gov
*Key to Authority Abbreviations:				Method of Service:			
SCAQMD - South Coast Air Quality Management District CCR - California Code of Regulations				CH&SC - California Health and Safety Code CFR - Code of Federal Regulations		<input type="checkbox"/> In Person <input checked="" type="checkbox"/> Certified Mail	

ORIGINAL

& electronic mail



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

P 75332

NOTICE OF VIOLATION

DATE OF VIOLATION		
Month	Day	Year
7	8	24

Facility Name Chiquita Canyon Landfill		Facility ID# 119219	Sector VB
Location Address 29201 Henry Mago Drive		City Castaic	Zip 91384
Mailing Address 24201 Henry Mago Drive		City Castaic	Zip 91384

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1	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	402			For discharging such quantities of air contaminants to cause injury, discomfort, 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: 661.331.9214	Served By: Tony Allen	Date Notice Served: 7.8.24
Title: District Manager	Email: stevenc@wasteconnectors.com	Phone No: <input checked="" type="checkbox"/> 909-396-2673 <input type="checkbox"/> 310-233-	Email: tallen@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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South Coast Air Quality Management District
21865 COPLEY DRIVE, DIAMOND BAR, CA 91765-4178

P 78437

NOTICE OF VIOLATION

DATE OF VIOLATION		
Month:	Day:	Year:
07	09	24

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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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:	Steven Cassulo	Phone:	661-371-9241	Served By:	Arely Gil Rojas	Date Notice Served:	7/9/24
Title:	District Manager	Email:	Steven.cassulo@wasteconnections.com	Phone No.:	<input checked="" type="checkbox"/> 909-396-2183 <input type="checkbox"/> 310-233-	Email:	arejas@aqmd.gov
*Key to Authority Abbreviations:				Method of Service:			
SCAQMD - South Coast Air Quality Management District CCR - California Code of Regulations				CH&SC - California Health and Safety Code CFR - Code of Federal Regulations			
				<input type="checkbox"/> In Person <input checked="" type="checkbox"/> Certified Mail			

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

P 77678

NOTICE OF VIOLATION

DATE OF VIOLATION		
Month	Day	Year
07	11	2024

Facility Name: CHIGUITA CANYON LANDFILL	Facility ID: 11 9219	Sanction: VB
Location Address: 29201 HENRY MAYO DRIVE	City: CASTAIC	Zip: 91384
Mailing Address: 29201 HENRY MAYO DRIVE	City: CASTAIC	Zip: 91384

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1	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	Rule 402			FOR DISCHARGING SUCH QUANTITIES OF AIR CONTAMINANTS TO CAUSE INJURY, DETRIMENT, NUISANCE OR ANNOYANCE TO A CONSIDERABLE NUMBER OF PERSONS.
2	<input type="checkbox"/> SCAQMD <input checked="" type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	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 CASASO	Phone: 661.371.9214	Served By: HUGO CAMPOS	Date Notice Served: 07/11/2024
Title: DISTRICT MANAGER	Email: steve.ca@wasteconnections.com	Phone No.: <input checked="" type="checkbox"/> 909-396-2110 <input type="checkbox"/> 310-233-	Email: hcampos @ aqmd.gov

*Key to Authority Abbreviations:

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

Method of Service

☐ In Person

☒ Certified Mail

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NOTICE OF VIOLATION

DATE OF VIOLATION		
Month	Day	Year
7	12	24

Facility Name: Chiquita Canyon Landfill	Facility ID: 119219	Owner: VP
Location - Address: 29201 Henry Mayo Drive	City: Costa Rica	Zip: 91384
Mailing Address: 29201 Henry Mayo Drive	City: Costa Rica	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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A	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			"
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: 7/12/24
Title: District Manager	Email: Steven.Cassulo@wasteconnections.com	Phone: <input checked="" type="checkbox"/> 909-396-2431 <input type="checkbox"/> 310-233-	Email: amartinez2@aqmd.gov
Method of Service: <input type="checkbox"/> In Person <input checked="" type="checkbox"/> Certified Mail			

*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

ORIGINAL



NOTICE OF VIOLATION

DATE OF VIOLATION		
Month:	Day:	Year:
07	15	24

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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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			11
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:	Steven Cassulo	Phone:	661-371-9214	Served By:	Arely Gil Rojas	Date Notice Served:	7/15/24
Title:	Distrd Manager	Email:	Steven.cassulo@wasteconnections.com	Phone No:	<input checked="" type="checkbox"/> 909-396-2183 <input type="checkbox"/> 310-233-	Email:	arajas@aqmd.gov
*Key to Authority Abbreviations:						Method of Service:	
SCAQMD - South Coast Air Quality Management District			CH&SC - California Health and Safety Code			<input type="checkbox"/> In Person	
CCR - California Code of Regulations			CFR - Code of Federal Regulations			<input checked="" type="checkbox"/> Certified Mail	



NOTICE OF VIOLATION

DATE OF VIOLATION		
Month	Day	Year
7	16	24

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. (1 Apolloscale)	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			11
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: 7/16/24
Title: District Manager	Email: Steven.Cassulo@wasteconnection.com	Phone: <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



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

P 80632

NOTICE OF VIOLATION

DATE OF VIOLATION		
Month:	Day:	Year:
07	17	2024

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

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	<u>402</u>			<u>For discharging such quantities of air contaminants to cause injury, detriment, nuisance or annoyance to a considerable number of persons.</u>
2	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	<u>41700</u>			<u>For discharging such quantities of air contaminants to cause injury, detriment, nuisance or annoyance to a considerable number of persons.</u>
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: <u>Steve Cassuto</u>	Phone: <u>661 371-9214</u>	Served By: <u>Karen Woullard</u>	Date Notice Served: <u>07/17/2024</u>
Title: <u>District Manager</u>	Email: <u>steve.cassuto@wasteconnections.com</u>	Phone No.: <input checked="" type="checkbox"/> 909-396-2285 <input type="checkbox"/> 310-233-	Email: <u>kwoullard @ aqmd.gov</u>

*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



NOTICE OF VIOLATION

DATE OF VIOLATION		
Month:	Day:	Year:
7	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 Drive		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		_____ _____ _____	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: Evan Landi	Date Notice Served: 7/18/2024
Title: District Manager	Email: Steven.cassulo@wasteconnections.com	Phone No: <input checked="" type="checkbox"/> 909-396-2306 <input type="checkbox"/> 310-233-	Email: elandi @ aqmd.gov	

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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:

☐ In Person ☒ Certified 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 Enforcement Authority	http://www.aqmd.gov/home/about http://www.aqmd.gov/home/about/authority/enforcement
General Counsel’s Office (909) 396-3400	Compliance Notices SCAQMD Rules	http://www.aqmd.gov/home/regulations/compliance/compliance-notices 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



NOTICE OF VIOLATION

DATE OF VIOLATION		
Month	Day	Year
07	19	24

Facility Name: Chiquita Canyon Landfill	Facility ID: 119219	Section: JB
Location Address: 29201 Henry Mayo Dr	City: Castaic	Zip: 91394
Mailing Address: 29201 Henry Mayo Dr	City: Castaic	Zip: 91394

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

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

DESCRIPTION OF VIOLATIONS

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

Served To: Steve Cassulo	Phone: (661)-371-9214	Signed By: Daniel Wood	Date Notice Served: 7/19/24
Title: District Manager	Email: steve.cassulo@wasteconnectors.com	Phone No: <input checked="" type="checkbox"/> 909-396-2433 <input type="checkbox"/> 310-233-	Email: DWood @ aqmd.gov
Method of Service: <input type="checkbox"/> In Person <input checked="" type="checkbox"/> Certified Mail			

*Key to Authority Abbreviations:

SCAQMD - South Coast Air Quality Management District
CCR - California Code of RegulationsCH&SC - California Health and Safety Code
CFR - Code of Federal Regulations

ORIGINAL



South Coast
AQMD

NOTICE OF VIOLATION

DATE OF VIOLATION		
Month:	Day:	Year:
7	22	24

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

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

Served To: <i>Steve Cassulo</i>	Phone: <i>661 371 9214</i>	Served By: <i>Naron Neuhäuser</i>	Date Notice Served: <i>7/22/24</i>
Title: <i>District Manager</i>	Email: <i>stevecassulo@scqm.com</i>	Phone No: <input checked="" type="checkbox"/> 909-396-2513 <input type="checkbox"/> 310-233-	Email: <i>aneuhauser@aqmd.gov</i>

*Key to Authority Abbreviations:

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

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

Method of Service:

☐ In Person

☒ Certified Mail

ORIGINAL



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

P 73574

NOTICE OF VIOLATION

DATE OF VIOLATION		
Month	Day	Year
07	23	24

Facility Name CHIUQUITA CANYON LLC	Facility CIL 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"/> CHASC <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"/> CHASC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	CHS SL 4100			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"/> CHASC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
4	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CHASC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
5	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CHASC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				

Served To STEVE CASSULO	Phone 661.371.9214	Served By BILLY ANTONIO	Date Notice Served 07/23/24
Title DISTRICT MANAGER	Email skewasteconnections.com	Phone No. <input checked="" type="checkbox"/> 809-396-2682 <input type="checkbox"/> 310-233-	Email bantonio@aqmd.gov
*Key to Authority Abbreviations: SCAQMD - South Coast Air Quality Management District CHASC - 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



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

P 77679

NOTICE OF VIOLATION

DATE OF VIOLATION		
Month	Day	Year
07	25	2024

Facility Name: CHIUQUITA CANYON LANDFILL	Facility ID: 119219	Region: 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

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1	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	Rule 402			FOR DISCHARGING SUCH QUANTITIES OF AIR CONTAMINANTS TO CAUSE INJURY, DETRIMENT, NUISANCE OR ANNOYANCE TO A CONSIDERABLE NUMBER OF PERSONS.
2	<input type="checkbox"/> SCAQMD <input checked="" type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	CH&SC 41700			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: 661.376.9214	Served By: HUGO CAMPAS	Date Notice Served: 07/25/2024
Title: DISTRICT MANAGER	Email: steve.ca@waseconnections.com	Phone No.: <input checked="" type="checkbox"/> 909-396-2110 <input type="checkbox"/> 310-233-	Email: hcampas@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:
7	31	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 Drive	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		_____ _____ _____	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: Evan Landi	Date Notice Served: 7/31/2024
Title: District Manager	Email: Steven.cassulo@wasteconnections.com	Phone No: <input checked="" type="checkbox"/> 909-396-2306 <input type="checkbox"/> 310-233-	Email: elandi @ aqmd.gov

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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.

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

- **Civil Prosecution**

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

- **Criminal Prosecution**

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

Civil and Criminal Penalties

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

Available Resources

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

Contact Numbers	Useful Links	
General Information:		
SCAQMD Headquarters General Number (909) 396-2218	About SCAQMD Enforcement Authority	http://www.aqmd.gov/home/about
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 B

NOTICE OF VIOLATION

July 1, 2024

CHIQUITA CANYON LLC
C/O STEVE CASSULO
29201 HENRY MAYO DRIVE
CASTAIC CA 91384

Code Enforcement Case Number: RPZPE2024003365
Conditional Use Permit Number: 200400042

Dear Property Owner/Permittee:

A review of the 2023 Annual Compliance Report and January 2024 – May 2024 Monthly Reports, submitted pursuant to the Implementation and Monitoring Program of Conditional Use Permit (CUP) 200400042 for the Chiquita Canyon Landfill (Landfill) operations located at **29201 Henry Mayo Drive, Castaic, CA**, disclosed the following violation(s):

Conditional Use Permit Violations

One or more conditions of an approved CUP are not being met (Los Angeles County Zoning Code: 22.02.030(B); 22.242.020; 22.242.030)

Condition 23. The maximum tonnage capacity to be received at the Facility shall be as follows:

A. Average Daily Tonnage Capacity

1. The amount of Solid Waste that may be disposed of in the Landfill shall average 6,616 tons per day, Monday to Saturday.

E. Facility Annual Maximum Capacity

1. Of the overall tonnage, Solid Waste disposed may not exceed 2,064,300 tons in any calendar year.

Case Number:
RPZPE2024003365

APN:
3271002039, 3271002036,
3271005034, 3271002019,
3271002013, 3271002011

Zone:
A-2-5

Investigating Planner:
Ai-Viet Huynh

Email:
ahuynh@planning.lacounty.gov

Phone Number:
(213) 974-6483
Monday - Thursday

Chiquita Canyon, LLC (CCL) is in violation of Condition 23 of the CUP as it has exceeded the Average Daily Tonnage for solid waste and the Facility Annual Maximum Capacity for solid waste.

*Condition 23(A)(1) - In 2023, there were **47 occurrences** where the average daily tonnage for solid waste (calculated weekly Monday to Saturday) exceeded the capacity of 6,616 tons per day. Between January 1, 2024 and May 31, 2024, there were **19 occurrences** where the average daily tonnage for solid waste (calculated weekly Monday to Saturday) exceeded the capacity of 6,616 tons per day.*

*Condition 23(E)(1) - The total solid waste disposed in 2023 was 2,193,713.07 tons, which exceeds the annual maximum capacity for solid waste by **129,413.07 tons**.*

CCL must abate these violations and comply with Condition 23. In lieu of removing the excess tonnage from the waste mass, CCL must reduce the annual solid waste disposal (2,064,300 tons) by 129,413 tons during the Calendar Year 2024. The permittee must provide a compliance plan within 30 days of receipt of this notice.

Condition 12. The subject property shall be developed, maintained, and operated in full compliance with the conditions of this grant, and any law, statute, ordinance, or other regulation applicable to any development or activity on the subject property.

Permittee is in violation of Conditional Use Permit (CUP) 200400042 - Condition 23(A)(1) on 66 occurrences and Condition 23(E)(1) for 26 days.

Pursuant to Condition 20, the Permittee shall be subject to a penalty for violating any provision of this grant in an amount determined by the Director of Regional Planning, not to exceed \$1,000 per day per violation. The Director has determined the penalties for violating provisions of the CUP enumerated herein are as follows:

1. \$1,000 per day for violation of Condition 23(A)(1) for exceedances on 66 occurrences in 2023 and 2024 - **[\$66,000]**
\$1,000 per day for violation of Condition 23(E)(1) between December 6, 2023 and December 31, 2023 - **[\$26,000]**

Please consider this an order to comply with the provisions of CUP 200400042 within thirty (30) days of receipt of this notice. You may appeal this Notice of Violation to a Hearing Officer pursuant to Section 22.242.070(C)(1) [formerly, Section 22.60.390(C)(1)] of the Los Angeles County Code within fifteen (15) days of receipt of this notice.

Furthermore, failure to comply with this order may result in a referral to the District Attorney or County Counsel at any time with the request that a civil and/or criminal complaint be filed against you. In addition, pursuant to Condition Number 20, this matter may be referred to the Regional Planning Commission to consider revocation or modification of the CUP.

For any other inquiries please contact the investigating planner directly as noted by the contact information listed in the right-hand column on page 1.

Sincerely,

Amy J. Bodek, AICP
Director,
Regional Planning



Steven Jareb
Supervising Regional Planner

Ref: RPZPE2024003365

Page 3 of 3

Attachment C

Action Items for South Coast Air Quality Management District

Case No. 6177-4 Stipulated Order for Abatement (modified on April 24, 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
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
37	Submit the results to South Coast AQMD along with the lab analysis from the 10/20/23 sampling event	3/15/2024	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
36	Provide updates to South Coast AQMD on the installation of the continuous BTEX/VOC monitoring equipment	3/17/2024	Completed
12(i)	Conduct second flux chamber study	3/19-21/2024	Completed

Condition No.	Key Action	Start Date/Deadline	Status
67	Designate an Inspection Liaison	3/25/2024	Completed
64	Provide Leachate Management Plan submitted to EPA under UAO to South Coast AQMD	3/28/2024	Completed
12(a)(iv)	Add Reaction Committee member relating to public health	4/5/2024	Completed
18	Revise dewatering guidelines and resubmit for approval	4/4/2024	Completed
56	Conduct sampling and analysis of vapors in headspace of leachate tanks in #9 Top Deck Tank Farm	4/4/2024	Completed
15(b)(i)	Submit an updated design and installation schedule incorporating the additional wells under Condition 15(a) and (b) and their associated piping	4/18/2024	Completed
56	Submit report of headspace tank sampling and analysis parameters and lab results to South Coast AQMD	4/18/2024	Completed
66	Submit recommendations regarding installation of remote well pressure and temperature monitoring system	4/19/2024	Completed
34(a)	Ensure that weekly benzene and live H2S 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	Completed
57	Submit expedited permit modification application for Landfill Gas Condensate and Leachate Collection/Storage System to increase liquid storage capacity	4/22/2024	Completed
60	Submit expedited permit modification application for Landfill Gas Collection to include tie-in of the treatment system vapor vent lines	4/22/2024	Completed
63	Submit schematic of current leachate treatment and storage system to South Coast AQMD	4/22/2024	Completed
69 (old)	Submit workplan to restart leachate pumping to South Coast AQMD Hearing Board	4/22/2024	Completed
1(f)	Designate an employee in the Reaction Area and the working face area able to receive notifications related to odor surveillance results	4/25/2024	Completed
12(g)(i)	Submit report on study of treatment of DMS and preventative mechanisms for DMS formation	4/30/2024	Completed

Condition No.	Key Action	Start Date/Deadline	Status
34(c)	Retain a third party to develop an automatic electronic notification system for the community air monitoring	4/30/2024	Completed
36	Install and maintain continuous BTEX/VOC monitoring equipment at MS-10 and MS-12	5/1/2024	Completed
36	Develop a monitoring plan for the microGCs	5/1/2024	Completed
36(a)	Make continuous BTEX/VOC monitoring data available on Chiquita's Odor Mitigation webpage	5/1/2024	Completed
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	5/1/2024	Completed
32(c)	Revise air modeling study proposal and resubmit to South Coast AQMD	5/8/2024	Completed
72(b)	Submit source test protocol for vapor flow testing	5/17/2024	Completed
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	Completed
62	Submit expedited permit modification application for Landfill Gas Flares System (Flare No. 3) to include combustion vapor from treatment system	5/21/2024	Completed
71	Submit a complete permit application for the landfill gas collection system under the geosynthetic cover	5/21/2024	Completed
73	Prepare an inventory of all internal combustion engine equipment rated greater than 50 HP onsite as of April 25, 2024	5/21/2024	Completed
34(c)	Third party must develop and install an automatic electronic notification system for the community air monitoring	5/30/2024	Completed
12(i)	Submit report on second flux chamber study	6/3/2024	Completed
58	Submit expedited permit modification application for Zeeco TOX	6/21/2024	Completed
59	Submit expedited permit modification application for Landfill Gas Condensate and Leachate Treatment System for hazardous waste treatment	6/21/2024	Completed
66	Finalize contracts to install and operate remote well pressure and temperature monitoring system	6/21/2024	Completed

Condition No.	Key Action	Start Date/Deadline	Status
12(g)(viii)	Conduct an investigation into piping materials and submit a report on the existing and future planned piping, including a recommendation of appropriate piping materials and replacement of existing piping materials	6/21/2024	Completed
12(g)(vii)	Develop a model to estimate the rate of liquid generation in the landfill and total quantity of liquid existing within the landfill waste mass at any given time and submit a report summarizing the model and results of the modeling	6/25/2024	Completed
70	Submit a report on current and projected landfill gas generation and flaring capacity	6/28/2024	Completed
73	Submit a permit application for internal combustion engine equipment rated greater than 50 HP that is not already permitted through SCAQMD	6/30/2024	Completed
15(b)(i)	Install 50% of wells necessary to achieve well installation density	7/1/2024	Completed
68	Install pressure gauges on each leachate tank	7/10/24	Completed
72(b)	Resubmit source test protocol for vapor flow testing	7/12/24	Completed
72(e)	Install flow meters within the HDPE piping headers for the leachate tanks	7/19/2024	Completed
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	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
1(f)	Have trained employee(s) or contractor(s) re-perform odor surveillance following deployment of additional fresh trash odor mitigation to assess if trash odors have dissipated	4/25/2024; ongoing	Ongoing

Condition No.	Key Action	Start Date/Deadline	Status
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	3/22/2024; 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	3/22/2024; weekly	Ongoing
5	Sample LFG sulfur compounds for total sulfur compounds as H ₂ S using South Coast AQMD Method 307-91	3/22/2024; 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	3/22/2024; monthly	Ongoing
6	Maintain adequate stock of appropriately ranged colorimetric tubes	9/7/2023; ongoing	Ongoing
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 SO _x limits	9/7/2023; ongoing	Ongoing

Condition No.	Key Action	Start Date/Deadline	Status
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(f)(iv)	Following each Reaction Committee meeting, prepare meeting summary and post on webpage	March 2024; monthly	Ongoing; posted on Chiquita's website
12(h)	Post all expert reports on Odor Mitigation webpage	9/7/2023; ongoing	Ongoing; posted on Chiquita's website
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	3/22/2024; 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
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	9/7/2023; ongoing	Ongoing
15	Expand well-field	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	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

Condition No.	Key Action	Start Date/Deadline	Status
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 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
15(l)	Install well boots seals on all wells in Reaction Area	1/18/2024; ongoing	Ongoing
15(n)	All new vertical wells installed in the Reaction Area must be dual extraction wells	4/25/2024; ongoing	Ongoing
15(n)	For 75% of wells, install dewatering infrastructure within 30 days of completion of well drilling	4/25/2024; ongoing	Ongoing
15(n)	For 25% of wells, install dewatering infrastructure within 60 days of completion of well drilling	4/25/2024; ongoing	Ongoing
17, 17(a)	Expediently dewater wells to the maximum extent feasible; take proactive measure to remove additional liquids in the Reaction Area	3/22/2024; ongoing	Ongoing; see Condition 8 monthly reports
18	Implement proposed Reaction Area dewatering guidelines and implementation procedures	12/5/2023; ongoing	Ongoing
18	Implement revised dewatering guidelines to the maximum extent feasible	Within 7 days of approval of revised guidelines; 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

Condition No.	Key Action	Start Date/Deadline	Status
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 all the 6-inch pipes feeding into the onsite frac tanks and at the piping leading into all tank farms, including a map of the monitoring locations and the tanks/tank farms downstream of the monitoring locations	4/25/2024; 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
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	1/18/2024; 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

Condition No.	Key Action	Start Date/Deadline	Status
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	3/22/2024; ongoing	Ongoing
30	Visually inspect landfill cover and geosynthetic cover in and around the Reaction Area; repair landfill cover and geosynthetic cover within 2 hours of identification, safety permitting, or schedule permanent repair of geosynthetic cover immediately and permanently repair as soon as possible; maintain log of cover repairs	4/25/2024; 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	9/7/2023; as needed	Ongoing
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; ongoing	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 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

Condition No.	Key Action	Start Date/Deadline	Status
35(b)	Implement quality control measures as specified by South Coast AQMD within 30 days of notification	4/25/2024; as needed	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	1/18/2024; ongoing	Ongoing
39	Maintain Odor Mitigation webpage; update weekly	9/7/2023; weekly	Ongoing
39	Translate Odor Mitigation webpage and reports into Spanish; submit reports to translation service within 2 business days of posting on webpage and upload to webpage within 2 business days of receipt from translation service	4/25/2024; ongoing	Ongoing; posted on Chiquita's website
40	Host community information meetings monthly based on receipt of NOVs	9/14/2023; ongoing	Ongoing
42	Implement additional mitigation measures while conducting non-exempt Rule 1150 excavation activities until final approval of Rule 1150 landfill excavation plan	1/18/2024; as needed	Ongoing
42(a)	Notify South Coast AQMD at least two days before and within five days after completion of excavation activities while conducting non-exempt Rule 1150 excavation activities until final approval of Rule 1150 landfill excavation plan	1/18/2024; as needed	Ongoing
43	Maintain fresh trash odor mitigation measures during Unfavorable Wind Conditions	9/7/2023; ongoing	Ongoing
43(f)	If trash-based odors are detected during Condition 1(f) odor surveillance, deploy additional orchard fans to working face and surrounding area	4/25/2024; ongoing	Ongoing
43(f)	If trash-based odors are not reduced within 1 hour of deployment of additional fans, reduce working face by 25% of the day's total size	4/25/2024; 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
50	Follow the direction of EPA to implement the Master Work Plan submitted to EPA under the Unilateral Administrative Order (UAO)	4/25/2024; ongoing	Ongoing
51	Permit South Coast AQMD personnel to conduct inspections deemed necessary, including sample collection	1/18/2024; ongoing	Ongoing
51	When South Coast AQMD observes uncontrolled liquid that may be leachate during an inspection, collect a sample 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)	3/22/2024; ongoing	Ongoing
51	Provide South Coast AQMD with any updates to the Health and Safety Plan within 1 business day of updates going into effect	4/25/2024; ongoing	Ongoing
51(a)	To the extent required by the Health and Safety Plan, maintain onsite at least two 5-gas monitors for regulatory personnel to use	3/22/2024; ongoing	Ongoing
52	Host meetings between South Coast AQMD technical staff and Chiquita's technical consultants	1/18/2024; biweekly	Ongoing
53	Submit report on leachate tank numbers and quantities of liquid collected and treated	4/3/2024; weekly	Ongoing; posted on Chiquita's website
54	Collect, convey, and store flare condensate separate from leachate; no mixing of flare condensate and leachate	3/22/2024; 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
72(d)	Conduct pressure testing and monitoring within the HDPE headers venting the leachate tanks until pressure gauges are installed	4/29/2024; daily	Ongoing; see Condition 8 monthly reports
73	Submit a permit application for any internal combustion engine equipment rated greater than 50 HP brought onsite that does not already have a valid SCAQMD permit or for which a permit application was not submitted prior to 6/30/2024	6/30/2024; ongoing	Ongoing
68	Report daily pressure readings, pressure testing location, indication of the tank farm represented by the test results, and indication	7/10/2024; daily	Ongoing; see Condition 8 monthly reports

Condition No.	Key Action	Start Date/Deadline	Status
	of each tank within the tank farm represented by the test results to South Coast AQMD		
72(e)	Report flow rate, flow meter location, related tank farm, and indication of each tank within the tank farm vented and represented in the flow rate to South Coast AQMD	7/19/2024; daily	Ongoing; see Condition 8 monthly reports
69	Inspect and monitor piping materials for buckling, rupturing, cracking, melting, liquid leaks, or other structural concerns; record monitoring activity and work performed to resolve any issues	7/19/2024; quarterly	Ongoing

Future Actions

Condition No.	Key Action	Start Date/Deadline	Status
32(c)	Submit final report on additional air modeling study	9/2/2024 or 90 days after South Coast AQMD approval of proposal, whichever is later	
15(b)(ii)	Install 75% of wells necessary to achieve well installation density	10/1/2024	
66	Install and operate remote well pressure and temperature monitoring system	10/22/2024	
15(b)	Install additional gas wells to achieve a vertical well density of an average of three operational wells per acre with at least two wells per acre	1/6/2025	
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	

Condition No.	Key Action	Start Date/Deadline	Status
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	
70	Submit a complete permit application for the construction of new combustion/control equipment	1/7/2025	
69	Submit a recommendation as to modifying the frequency of piping monitoring	7/31/2025	
50	Submit monthly progress reports submitted to EPA under the UAO to South Coast AQMD	After EPA's approval of the Master Work Plan	
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	
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	
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	As needed	
15(m)	Submit semi-annual as-built drawings in duplicate to South Coast AQMD	Semi-annually	
34(c)	Third party must put automatic electronic notification system for the community air monitoring into effect	Within 3 business days of direction from South Coast AQMD	
72(b)	Conduct source testing for vapor flow testing	Within 45 days of South Coast AQMD approval of protocol	
72(b)	Submit final source test report for vapor flow testing	Within 30 days of testing	
72(a)	Sample and analyze vapor flow in the piping used to vent the leachate tanks; submit results in monthly Condition 8 reports	Upon completion of source testing; quarterly	
72(c)	Submit a recommendation on additional vapor flow testing	Within 30 days of submission of the source test report	

Attachment D

Milestones Required by the June 6, 2024 LEA Compliance Order

Milestone #	Key Action	Start Date/Deadline	Status
1A-1	Submit a revised air/soil break plan	July 8, 2024	Completed
1A-2	Submit a revised report with CO and H2 readings for all gas collection wells in the reaction area and wells 200 feet outside the reaction area	June 11, 2024	Completed
1A-3	Submit lab test results for all monthly LFG sampling (including CO and H2) from a set of LFG wells selected by the LEA	September 15, 2024; monthly by the 15th of the following month	In progress; first monthly report will be submitted by September 15, 2024
1B-1	Submit a revised Completion Report for the installation of the temperature monitoring probes	June 11, 2024	Completed
1B-2	Submit weekly temperature monitoring probe data reports	June 7, 2024; weekly, every Thursday	Ongoing
1B-3	Provide a temperature contour map showing color-coded observations based on the maximum observed temperature collected during the month	June 15, 2024; monthly by the 15th of the month	Ongoing
1B-4	Install three temperature probes around the area that is extending south into areas outside of the previously defined reaction area	July 11, 2024 – on hold pending discussions with the LEA	Under discussion with the LEA
2A-1	Install the 30-mil HDPE geosynthetic cover over the 30-acre reaction settlement area and around any wells showing signs of reaction	August 2, 2024 – pending completion of the west toe drain and scrim repair project	In progress; see weekly updates and related reports on Chiquita's website
2A-2	Provide weekly updates on the geosynthetic cover installation	June 14, 2024; weekly, every Friday	Ongoing
2B	Submit weekly cover reports tracking issues with the landfill soil and geosynthetic cover as well as settlement and stability concerns	Weekly, every Tuesday	Ongoing
3-1	Ensure slope stability issues are included in the weekly cover reports	Weekly, every Tuesday	Ongoing
3-2	Revise the slope stability analysis of the west and north slopes of the Landfill	Two weeks from the date of the LEA comment letter	Pending receipt of LEA comment letter
4-1	Install and operate an additional 107 LFG extraction wells as per approved	July 31, 2024	Completed

	February 26, 2024 Remediation Plan for LFG Exceedance		
4-1	Notify the LEA upon completion of installation and operation of additional 107 LFG extraction wells	July 31, 2024	Completed
4-1	Provide a final completion report for the 107 LFG wells	July 31, 2024	Completed
4-2	Submit weekly status updates on the installation of the LFG extraction wells	Weekly, every Wednesday	Ongoing
4-3	Submit weekly results of methane readings at wells GP-13 and GP-15	Weekly, every Wednesday	Ongoing
4-4	Demonstrate compliance with 27 CCR Section 20921 within the 120-day compliance period that begins after the completion of the planned LFG extraction well construction referred to in the February 2024 Remediation Plan	120 days after completion of the LFG extraction well installation and no later than November 28, 2024	In progress
5	Submit monthly report with maps showing defined reaction area, expansion of reaction area if any, weekly temperature monitoring probe data, settlement with heat maps, and LFG data including but not limited to CO and H2 data	September 15, 2024; monthly by the 15th of the following month	In progress; first monthly report will be submitted by September 15, 2024

Attachment E

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
25	Develop and submit a Health and Safety Plan.	March 21, 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
76-79	Submit initial cost estimates.	April 26, 2024; updated July 2, 2024	Completed
22(c)(1)	Submit revised Leachate Management Plan (part of Master Work Plan).	May 4, 2024	Completed
22(c)(6)	Submit revised Air Monitoring Plan (part of Master Work Plan).	May 7, 2024; updated May 17, 2024	Completed
76-79	Submit revised cost estimate.	June 11, 2024	Completed
22(c)(2)	Submit revised Soil Reaction Break/Barrier Plan (part of Master Work Plan).	July 8, 2024	Completed
22(c)(3)	Submit revised Cover Installation Plan (part of Master Work Plan).	July 9, 2024	Completed
22(c)(5)	Submit revised Temperature Monitoring Plan (part of Master Work Plan).	July 17, 2024	Completed
30	Submit Data Management Plan.	July 17, 2024	Completed

Paragraph #	Key Action	Start Date/Deadline	Status
80-86	Submit proposed financial assurance documents.	July 30, 2024	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	Submit a copy of each proposed contractor's QMP and demonstrate their compliance with ASQ/ANSI E4:2014.	Ongoing; extension requested	Ongoing
17	Notify EPA of any additional retained contractors or subcontractors.	At least 5 days prior to commencement of Work	As needed; ongoing
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
22(b), (c)	Provide a Master Work Plan subject to EPA's approval, 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	Submitted Plan; updating components of the Plan in response to EPA comments
24	Submit a Sampling and Analysis Plan subject to EPA's approval, including a Field Sampling Plan and Quality Assurance Project Plan.	March 27, 2024	Submitted Plan for EPA's approval
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

Paragraph #	Key Action	Start Date/Deadline	Status
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
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

Paragraph #	Key Action	Start Date/Deadline	Status
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.	Ongoing/prior to commencing Work; annually	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
73, 75	Certify to EPA that Chiquita's contractors and subcontractors have obtained the required insurance.	Ongoing/prior to commencing Work	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
22(c)(1)	Submit second revised Leachate Management Plan	August 2, 2024	
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	
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	
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	After the end of the 5-year retention period and 90 days before any	

Paragraph #	Key Action	Start Date/Deadline	Status
	inspection and provide copies upon request.	documents or information is destroyed	