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Department of Toxic Substances Control

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Gavin Newsom
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SUMMARY OF VIOLATIONS

On and/or before November 18, 2025, the California Environmental Protection Agency, Department of Toxic Substances Control (DTSC), reviewed documentation related to:

Facility Name: Chiquita Canyon, LLC; Chiquita Canyon, Inc.; Waste Connections US, Inc.

Facility Address: 29201 Henry Mayo Dr., Castaic, CA 91384

EPA ID Number: CAL000347030, CAR000381574 **County:** Los Angeles

As a result of DTSC's investigation, DTSC discovered violations of the California Hazardous Waste Control Law (HWCL) and its implementing regulations that are identified on the attached pages. You must correct the following violations within the schedule for compliance for each violation. If you disagree with the alleged violations listed in this Summary of Violations, you must inform DTSC in writing. If additional violations existed or have existed which are not included in this Summary of Violations, such violations, if any, may be the subject of an amended or separate Summary of Violations and DTSC reserves all rights with respect to such violations.

You may request a meeting with DTSC to discuss the investigation or this Summary of Violations. The issuance of this Summary of Violations does not preclude DTSC from taking administrative and/or civil action or from referring the matter for criminal prosecution as a result of the violations identified herein or violations that have not been corrected within the time specified by DTSC. Failure to comply with a schedule for compliance, including without limitation the schedule of compliance in this Summary of Violations, is a violation of the law and is subject to a civil penalty of up to \$70,000 for each day of noncompliance. In addition, a false statement that compliance has been achieved is a violation of the law and is subject to a penalty of up to \$70,000 for each occurrence. DTSC may re-investigate this facility at any time.

Facility Representative Accepting
Summary of Violations

Name: _____

Signature: _____

Title: _____

Date: _____

DTSC Representative

Name: Erin Neal

Signature: *Erin Neal*

Title: Senior Environmental Scientist

Date: 11/18/2025



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SUMMARY OF VIOLATIONS

Facility Name: Chiquita Canyon, LLC; Chiquita Canyon, Inc;
Waste Connections US, Inc. **Date:** 11/18/2025

SECTION I: NON-MINOR VIOLATIONS AND REQUIRED CORRECTIVE ACTION

You must correct the following violations within the specified time frame for each violation.

Violation # 1

Violation Citation:

Cal. Code Regs., tit. 22, § 66262.251, A large quantity generator shall maintain and operate its facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

Relevant Citations:

HSC § 25189.2(b), Except as provided in subdivision (c) or (d), a person who violates a provision of this chapter or a permit, rule, regulation, standard, or requirement issued or adopted pursuant to this chapter, is liable for a civil penalty not to exceed seventy thousand dollars (\$70,000) for each violation of a separate provision or, for continuing violations, for each day that the violation continues.

Description:

On and/or before November 18, 2025, CCL failed to minimize the possibility of a release of hazardous waste or hazardous waste constituents to air, soil or surface water which could threaten human health or the environment. The accounts of these incidents are described in reports posted on CCL's website (<https://chiquitacanyon.com/odor-mitigation/>), email notifications sent by CCL to DTSC, and the California Governor's Office of Emergency Services (CalOES) Spill Release Reporting Dashboard (attached to this SOV as Exhibit A).

The individual releases that form the basis for this Violation #1 are attached as counts 1 – 27 in Exhibit B.



Department of Toxic Substances Control

7575 Metropolitan Drive, Suite 108
San Diego, CA 92108

Violation Classification:

These are class 1 violations.

Compliance Requirement:

CCL shall operate its facility in a manner that minimizes the possibility of a sudden or non-sudden release of hazardous waste or hazardous waste constituents.

Within 30 days of this SOV, CCL shall develop and submit a written plan that describes the efforts that CCL takes to operate its facility in a manner that minimizes the possibility of the release of hazardous waste and hazardous waste constituents. CCL shall assess the releases documented in this SOV and include in the written plan a description of current and future measures that CCL will implement to prevent releases of hazardous waste and hazardous waste constituents. CCL's current and future measures shall include, but are not limited to, process improvements for minimizing releases involving human errors (including third-party contractors), leachate management system design, pipe maintenance/construction, trucks, equipment malfunctions/failures, and releases involving pipes, tanks, wells, sumps, and pumps.

CCL's written response to prior violations involving releases referenced the Leachate Management Plan under US EPA's Unilateral Administrative Order. For this compliance requirement, reference to the Leachate Management Plan or materials prepared for other agencies is not an adequate response.

Violation # 2

Violation Citation:

HSC 25189.2(a), A person who makes a false statement or representation in an application, label, manifest, record, report, permit, or other document filed, maintained, or used for purposes of compliance with this chapter, is liable for a civil penalty not to exceed seventy thousand dollars (\$70,000) for each separate violation or, for continuing violations, for each day that the violation continues.

Cal. Code Regs., tit. 22, § 66262.23(a), The generator of any hazardous or extremely hazardous waste to be transported off-site or into California shall:

- (1) complete the generator and waste section and sign the manifest certification according to the Uniform Hazardous Waste Manifest, EPA Form 8700-22 and EPA Form 8700-22A) and instructions; and

...



Department of Toxic Substances Control

7575 Metropolitan Drive, Suite 108
San Diego, CA 92108

(6) The EPA hazardous waste number, if applicable, can be found in chapter 11, articles 3 and 4 and the California Hazardous Waste Code Number can be found in chapter 11, Appendix XII.

Description:

On and/or before October 27, 2025, CCL failed to properly complete hazardous waste manifests for hazardous waste condensate. Specifically, CCL incorrectly identified hazardous waste code D018 (benzene) and failed to include hazardous waste codes D004 (arsenic) and/or D038 (pyridine) on hazardous waste manifests used for off-site shipment and disposal of hazardous waste condensate.

CCL stated that condensate is generated from the landfill gas collection system, accumulates in a knockout pot prior to the flare station, and drains to Tanks T1/T2. According to CCL's records, Tanks 68, 69, 190, T1, and T2 have accumulated condensate in 2025. CCL stated that condensate is not treated on-site and is shipped off-site by tanker truck as hazardous waste.

CCL has provided a Waste Stream Documentation Form (Form), with sample results from February 2024, as its waste determination for Ameresco Condensate. The hazardous waste codes listed in the Form include federal waste codes D001 (ignitability), D004 (arsenic), and D018 (benzene). The analytical results that are attached to the Form show condensate to exceed regulatory thresholds (RT) for arsenic (RT: 5.0 mg/L), 2-butanone or methyl ethyl ketone (MEK) (RT: 200.0 mg/L), pyridine (RT: 5.0 mg/L), and flash point (RT: <140 °F). The analytical results provided do not show benzene exceedances in condensate. Federal waste codes D035 (MEK) and D038 (pyridine) are not listed on the Form. The waste profile number listed on the Form for Ameresco Condensate is CH2712208.

On October 27, 2025, CCL provided two waste profiles for condensate, CH2712208EL-1 and CH2909598, dated June 19, 2024 and March 12, 2025, respectively. The federal waste code listed in the waste profiles includes D018 (benzene). Both profiles check arsenic as a constituent that is "Not Applicable" and do not include an expected concentration for pyridine. The profiles do not list arsenic or pyridine as part of the waste composition, which is inconsistent with the information in CCL's Waste Stream Documentation Form.

On October 27, 2025, CCL provided 11 hazardous waste manifests for the disposal of hazardous waste condensate for 2025. These hazardous waste manifests include



Department of Toxic Substances Control

7575 Metropolitan Drive, Suite 108
San Diego, CA 92108

017791012FLE, 017791030FLE, 017791031FLE, 017791033FLE, 017791034FLE, 020750335FLE, 020750336FLE, 020750338FLE, 020750678FLE, 020750679FLE, and 020750875FLE. These hazardous waste manifests identify waste profile numbers CH2712208 or CH2909598 in the special handling instructions and additional information section of the manifest. From the hazardous waste manifests provided, the amount of hazardous waste condensate shipped off-site to date in 2025 totals approximately 211 tons.

On January 6, 2025, CCL sampled Tank 69, which was in exceedance for arsenic, reporting 23 mg/L (RT: 5.0 mg/L). Three hazardous waste shipments (017791012FLE, 01779130FLE, and 017791031FLE) occurred on January 23 and 24, 2025 from Tank 69. The waste profile number listed for these shipments was CH2712208 and the federal waste codes identified on the manifests were D001 (ignitability) and D018 (benzene).

On April 15 and 29, 2025, CCL sampled Tank 190, which were in exceedance for arsenic, each time reporting 120 mg/L (RT: 5.0 mg/L). Three hazardous waste shipments (020750335FLE, 020750336FLE, and 020750338FLE) occurred on May 9 and 10, 2025 from Tank 190. The waste profile number listed for these shipments was CH2909598 and the federal waste code identified on the manifests was D018 (benzene).

On June 27, 2025, CCL sampled Tank 190, which was in exceedance for arsenic and pyridine, reporting 96 mg/L arsenic (RT: 5.0 mg/L) and 6.4 mg/L pyridine (RT: 5.0 mg/L). Three hazardous waste shipments (020750678FLE, 020750679FLE, and 020750875FLE) occurred on July 22 and August 7, 2025 from Tank 190. The waste profile number listed for these shipments was CH2909598 and the federal waste code identified on the manifests was D018 (benzene).

On September 17, 2025, CCL sampled Tank T1, which was in exceedance for arsenic, reporting 140 mg/L (RT: 5.0 mg/L). One hazardous waste shipment (020750886FLE) occurred on September 30, 2025 from Tanks T1/T2. The waste profile number listed for this shipment was CH2909598 and the federal waste code identified on the manifest was D018 (benzene). While the shipment occurred within the specified timeframe of DTSC's October 13, 2025 information request, this hazardous waste manifest was not included in CCL's October 27, 2025 response.



Department of Toxic Substances Control

7575 Metropolitan Drive, Suite 108
San Diego, CA 92108

To date, CCL has not provided hazardous waste manifests to DTSC for liquids with federal waste codes D004 (arsenic) or D038 (pyridine).

Violation Classification:

This is a class 1 violation.

Compliance Requirement:

CCL shall ensure that all uniform hazardous waste manifests are fully complete and accurate, including but not limited to, identifying applicable waste codes.

Within 30 days of this SOV, CCL shall determine which hazardous waste manifests for hazardous waste condensate require corrections and submit manifest corrections via US EPA's e-Manifest system for all hazardous waste condensate shipments that contained arsenic and/or pyridine. CCL shall provide documentation of completion for these corrections to Erin Neal at Erin.Neal@dtsc.ca.gov and Zana Zmily at Zanalee.Zmily@dtsc.ca.gov. CCL shall provide an updated waste characterization for hazardous waste condensate. CCL shall provide complete analytical laboratory reports for all condensate samples, including but not limited to, samples collected in 2025 from Tanks 68, 69, 190, T1, and T2. CCL shall also provide a map of the condensate tank area including T1/T2 and its associated piping as requested in DTSC's information request on October 13, 2025.

Violation # 3

Violation Citation:

Cal. Code Regs., tit. 22, § 66262.17(a)(5), A large quantity generator may accumulate hazardous waste on site without a permit or interim status, and without complying with the requirements of chapters 14, 15, 16, and 20 of this division, or the notification requirements pursuant to Health and Safety Code section 25153.6, provided that all the following are met:

(a) Accumulation. A large quantity generator accumulates hazardous waste on site for no more than 90 days, unless in compliance with the accumulation time limit extension in subsection (b) of this section or section 66262.35 of this article.

The following accumulation conditions also apply:

...

(5) Labeling and marking of containers and tanks

(A) Containers. A large quantity generator shall mark or label its containers with the following:

1. The words "Hazardous Waste";
2. The composition and physical state of the wastes;



Department of Toxic Substances Control

7575 Metropolitan Drive, Suite 108
San Diego, CA 92108

3. An indication of the hazards of the contents [examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 Code of Federal Regulations part 172, subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 Code of Federal Regulations 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704];
4. The name and address of the person generating the waste;
5. The date upon which each period of accumulation begins shall be clearly marked and visible for inspection on each container; and
6. The date the applicable accumulation period specified in subsection (a) of this section begins shall be clearly marked and visible for inspection on each container.

(B) Tanks. A large quantity generator accumulating hazardous waste in tanks shall do the following:

1. Mark or label its tanks with the words "Hazardous Waste";
2. Mark or label its tanks with an indication of the hazards of the contents [examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 Code of Federal Regulations part 172, subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 Code of Federal Regulations 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704];
3. The date the applicable accumulation period specified in subsection (a) of this section begins shall be clearly marked and visible for inspection on each tank;



Department of Toxic Substances Control

7575 Metropolitan Drive, Suite 108
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4. Use inventory logs, monitoring equipment or other records to demonstrate that hazardous waste has been emptied within 90 days of first entering the tank if using a batch process, or in the case of a tank with a continuous flow process, demonstrate that estimated volumes of hazardous waste entering the tank daily exit the tank within 90 days of first entering; and
5. Keep inventory logs or records with the above information on site and readily available for inspection.

Description:

On and/or before August 19, 2025, CCL failed to properly label tanks containing hazardous waste leachate. DTSC observed that 20,000-gallon tanks storing hazardous waste leachate and/or condensate were not properly labeled with the words “Hazardous Waste”, an indication of the hazards of the contents, and the accumulation start date. In addition, CCL provided tank inspection logs from June 2025 to September 2025 that showed “Unsatisfactory” flags for the item “All containers have appropriate ‘Hazardous’, ‘Non-Hazardous’, or ‘Pending Analysis’ labels” for various hazardous waste leachate tanks on-site.

Violation Classification:

This is a class 2 violation.

Compliance Requirement:

CCL shall immediately properly label all containers/tanks accumulating hazardous waste. Within 30 days of this SOV, CCL shall provide documentation of compliance, including photographs to Erin Neal at Erin.Neal@dtsc.ca.gov and Zana Zmily at Zanalee.Zmily@dtsc.ca.gov.

In addition, DTSC observed at least 25 blue and green containers (approximately 50 gallons in size) located in various tank farm areas on-site on August 19, 2025. Per CCL’s September 24, 2025 response to DTSC’s follow-up questions from the site visit, the green bins are used to accumulate leachate from drip pans and the blue bins are used to accumulate soiled absorbent. At the time of the site visit, DTSC observed liquids and absorbent in unlabeled green bins and municipal trash in unlabeled blue bins.



Department of Toxic Substances Control

7575 Metropolitan Drive, Suite 108
San Diego, CA 92108

Containers accumulating hazardous waste must be properly labeled in accordance with Cal. Code Regs., tit. 22, § 66262.17(a)(5)(A). Tanks accumulating hazardous waste must be properly labeled in accordance with Cal. Code Regs., tit. 22, § 66262.17(a)(5)(B).

SECTION II: OTHER ISSUES/CONCERNS

The following issues/concerns were identified during this investigation. Further research may identify additional violations.

1. Additional releases of leachate and/or condensate have occurred at CCL. These incidents have not been identified as violations at this time; however, DTSC is concerned that these incidents demonstrate general leachate mismanagement on-site. The incidents are described in reports posted on CCL's website (<https://chiquitacanyon.com/odor-mitigation/>), email notifications sent by CCL to DTSC, and the CalOES Spill Release Reporting Dashboard (attached to this SOV as Exhibit D). These incidents are also summarized in the attached table (Exhibit E).
2. On September 24, 2025, CCL stated in a letter that it manages leachate and/or condensate-contaminated solids (such as soil or rock, absorbent, spent carbon media, and sludge) by separating like-media into roll-off bins. Once these roll-off bins are full, CCL will sample these bins prior to disposal. DTSC expresses concern that media collected in bins are comingling hazardous and non-hazardous contaminated solids. Within 30 days of this SOV, provide additional information in writing regarding how CCL manages solids by separating each media and how CCL identifies which bins are associated with hazardous and non-hazardous contaminated solids.



Department of Toxic Substances Control

7575 Metropolitan Drive, Suite 108
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ATTACHMENTS:

Exhibit A: Violation #1 Supporting Documents (contains CalOES reports, CCL's South Coast AQMD Abatement Order reports, CCL's RWQCB reports, and CCL correspondence with DTSC)

Exhibit B: Table 1 – Violation #1 Counts

Exhibit C: Violation #2 Supporting Documents (contains CCL's 10/27/2025 response to DTSC's 10/13/2025 information request, CCL's daily sampling summaries of condensate, CCL's Waste Stream Documentation Form for Ameresco Condensate, hazardous waste manifest 020750886FLE)

Exhibit D: Other Issues/Concerns #1 Supporting Documents (contains CalOES reports, CCL's South Coast AQMD Abatement Order reports, CCL's RWQCB reports, a CCL's Reaction Committee Meeting Summary, and CCL correspondence with DTSC)

Exhibit E: Table 2 – Other Issues/Concerns #1 – Incidents

Exhibit F: CCL's Summary of Leachate Leaks and Spills from September 4, 2024 to October 10, 2025