



4 de abril de 2025

Por e-mail

Sr. David Nguyen
Obras Públicas del Condado de Los Ángeles
900 S. Fremont Avenue
Alhambra, CA 91803
dnguyen@pw.lacounty.gov

Ref.: Vertedero de Chiquita Canyon - Informe de la Condición No. 69 del CUP

Estimado Sr. Nguyen:

La Condición 69 del Permiso de Uso Condicional ("CUP") de Chiquita Canyon, LLC ("Chiquita") requiere que al recibir cuatro Aviso de Violación ("NOVs") relacionados con la calidad del aire en un mismo año calendario, Chiquita debe presentar un informe a Obras Públicas ("PW") del Condado de Los Ángeles dentro de los 30 días después del cuarto NOV, explicando el NOV y los pasos tomados para tratarlo. Chiquita además debe proporcionar este informe dentro de los 30 días desde que recibe cualquier NOV adicional relacionado con el aire dentro del mismo año calendario.

En 2025, el Distrito de Gestión de la Calidad del Aire de la Costa Sur ("South Coast AQMD") emitió NOVs a Chiquita por violaciones de la Regla 402 del South Coast AQMD y del Código de Salud y Seguridad de California en su § 41700, activando la obligación de Chiquita de proporcionar un informe bajo la Condición 69 del CUP. Chiquita presentó un informe el 28 de febrero de 2025. Desde la presentación del informe del 28 de febrero, el AQMD de la Costa Sur emitió a Chiquita ocho NOVs adicionales de la Regla 402 por presuntas violaciones ocurridas en marzo y abril de 2025. Estas NOVs se indican en el Adjunto A.¹

El 1 de abril de 2025, el AQMD de la Costa Sur emitió la NOV P80892 de Chiquita por supuestas violaciones al Código de Salud y Seguridad de California § 42401 y a las Condiciones 3(a), 8, 8(d), 68 y 78 de la Orden de Depuración Estipulada ante el AQMD de la Costa Sur (Caso No. 6177-4) emitida el 6 de septiembre de 2023 y modificada el 17 de enero, el 21 de marzo, el 24 de abril, el 27 de agosto y el 13 de noviembre de 2024 (la "Orden Estipulada"). Este NOV se proporciona en el Adjunto B.

¹ Los números de las NOV y las fechas de las presuntas violaciones son los siguientes: NOV P68828 (4 de marzo de 2025); NOV P81011 (5 de marzo de 2025); NOV P80047 (11 de marzo de 2025); NOV P74050 (17 de marzo de 2025); NOV P73579 (21 de marzo de 2025); NOV P64624 (24 de marzo de 2025); NOV P79640 (25 de marzo de 2025); and NOV P80893 (3 de abril de 2025);

El 1 de abril de 2025, el Departamento de Control de Sustancias Tóxicas le emitió a Chiquita un Resumen de Violaciones ("SOV") por supuestas violaciones de 22 Regulaciones del Código de Regulaciones de California ("CCR") § 66262.17(a)(9), 22 CCR § 66262.251 y del Código de Salud y Seguridad ("HSC") § 25189.2(b). Este SOV se proporciona en el Adjunto C.

NOVs de la Regla 402 del South Coast AQMD – Explicación y Acción Correctiva

A continuación se proporciona un debate sobre las NOV's de la Regla 402 del South Coast AQMD, además de las acciones correctivas tomadas por Chiquita en respuesta a las NOV's.

Explicación

Estas NOV's fueron emitidas después de que un inspector del South Coast AQMD verificó los reclamos sobre los presuntos olores que provenían del Vertedero de Canyon de Chiquita (el "Vertedero"). Las NOV's son sustancialmente las mismas que las NOV's previas emitidas por South Coast AQMD que fueron tratadas en los informes previos de la Condición 69 del CUP de Chiquita. El origen de los olores es el mismo que el descrito en esos informes: un aumento en la producción de biogás y líquidos causados por una reacción anormal que estaba ocurriendo dentro de una parte más antigua de la masa de residuos del Vertedero.

Acción Correctiva

Chiquita proporcionó descripciones detalladas de las acciones correctivas que fueron tomadas para mitigar la reacción y los olores que emanaban del Vertedero en sus informes previos de la Condición 69 del CUP. Mientras que Chiquita no repite en este informe la información proporcionada en los informes previos, continúa tomando todas las acciones indicadas en esos informes. Las acciones correctivas descritas en esta sección incluyen únicamente las nuevas medidas que se están tomando desde la última actualización.

Orden Estipulada del AQMD de la Costa Sur: Bajo la Orden Estipulada, Chiquita ha implementado las siguientes medidas adicionales de mitigación:

- Chiquita continúa mejorando el sistema de pozos de biogás, instalando sondas de temperatura en los pozos. Al 28 de marzo de 2025 Chiquita ha instalado 32 sondas de temperatura desde que comenzó la instalación el 26 de febrero de 2024.
- Al 28 de marzo de 2025, Chiquita tiene un total de 136 bombas que operan en pozos de extracción vertical de biogás.

Chiquita presenta a South Coast AQMD las actualizaciones sobre el estado de su cumplimiento de la Orden Estipulada modificada en sus informes mensuales de la Condición 8. Estos informes están publicados en el sitio web de Chiquita. En el sitio web de Chiquita hay más información detallada sobre la implementación y el cumplimiento de Chiquita con la Orden Estipulada modificada.

Orden de Cumplimiento de la LEA: El 6 de junio de 2024, la LEA le emitió a Chiquita una Orden de Cumplimiento, formalizando las medidas de mitigación recomendadas por CalRecycle que habían sido

impuestas previamente por la LEA, como también otros requerimientos adicionales. Chiquita ha implementado el siguiente requerimiento adicional de la Orden de Cumplimiento de la LEA:

- El 17 de marzo de 2025, Chiquita presentó el informe semanal de problemas con las cubiertas. El informe, el resumen y los mapas están publicados en el sitio web de Mitigación de Olores de Chiquita.

En el sitio web de Chiquita hay más información detallada sobre la implementación de Chiquita de la Orden de Cumplimiento.

Mejora del programa de monitoreo del aire comunitario: Como se describió en informes previos, bajo la dirección del DPH, Chiquita ha mejorado su programa de monitoreo del aire actual. Los datos y los informes se encuentran en el sitio web de Chiquita y el informe más reciente se presentó el 21 de febrero de 2025. Chiquita también hizo una Página Web del Programa de Monitoreo del Aire de la Comunidad del Vertedero de Chiquita Canyon. <https://chiquitacanyon.com/reports/community-air-monitoring-program/>. La página contiene los datos promedio de 1 hora más recientes sobre ácido sulfhídrico y metano, como también la velocidad y la dirección del viento promedio para el mismo período de tiempo, de doce estaciones de monitoreo del aire de la comunidad.

Estudio de la Calidad del Aire del Vertedero de Chiquita Canyon: Como se describió en informes previos, un consultor externo condujo un estudio de 28 días sobre la calidad del aire, que proporcionó más datos e información sobre la calidad del aire en las comunidades que se encuentran alrededor del Vertedero. Se pueden encontrar datos de este estudio en la página web del Estudio de la Calidad del Aire de Chiquita (<https://chiquitalandfillairqualitydata.sensible-edp.com/>). Los consultores externos evaluaron estos datos y elaboraron informes sobre potenciales impactos para la salud y de los olores en base los datos tomados y analizados. Estos informes fueron presentados al AQMD de la Costa Sur el 1 de agosto de 2024, como lo requiere la Orden Estipulada, y están publicados en el sitio web de Chiquita. También hay disponible un resumen fácil de leer en el sitio web de Chiquita.

Programa Community Relief de Chiquita: Como se describe en informes previos, Chiquita estableció voluntariamente un Programa Community Relief para ayudar a compensar los costos asociados a la mitigación de los olores y ha contratado a un administrador externo para que administre este programa. A través del programa, los residentes de Val Verde, Live Oak, Hasley Hills, Hillcrest Parkway, Hasley Canyon y Stevenson Ranch pudieron solicitar financiación que podía ser utilizada para ayudar con los gastos reclamados asociados a la mitigación del olor, que incluyen reubicación temporal, dificultades en el hogar y aumento en las facturas de servicios públicos. Éste no fue un programa de reintegros. Sino que los solicitantes que presentaron solicitudes válidas, geográficamente elegibles, recibieron un pago por mes que podían utilizar de la forma que lo deseen, de forma similar a un estipendio. Los montos de pago variaron entre los solicitantes en base a una variedad de factores, que incluyen la ubicación geográfica y la evaluación de Chiquita sobre el alcance de los impactos del olor en base a datos objetivos sobre el olor.

Las solicitudes de financiación de cada mes debían ser presentadas a fin de mes. Los solicitantes debían volver a certificar sus solicitudes para ser elegibles para recibir financiación en los meses posteriores. Chiquita terminó el Programa Community Relief a fines de febrero de 2025. Más recientemente, se enviaron cheques por correo durante la semana del 21 de marzo para los solicitantes elegibles que presentaron solicitudes válidas nuevas en el mes de febrero, para recertificaciones válidas y para quienes han corregido los materiales de sus solicitudes anteriores.

Sr. David Nguyen
Obras Públicas del Condado de Los Ángeles
4 de abril de 2025
Página 4 de 5

Hay más información disponible sobre este programa en el sitio web del programa (<https://www.chiquitalandfillcommunityrelief.com/>). Los formularios y la información también están disponibles en español.

NOV P80892 del South Coast AQMD – Explicación y Acción Correctiva

El 1 de abril de 2025, Chiquita recibió una NOV del AQMD de la Costa Sur denunciando violaciones al Código de Salud y Seguridad de California § 42401 y a las Condiciones 3(a), 8, 8(d), 68 y 78 de la Orden Estipulada. La NOV alega específicamente: (1) "[i]ncumplimiento en completar la instalación de un revestimiento con una capa de polietileno de 60 mils (u otra cubierta de membrana flexible equivalente) para cada tanque de lixiviados y/o parque de tanques dentro de los 120 días de esta Orden"; (2) "[i]ncumplimiento en mantener los tanques bajo presión negativa, como lo demuestren las lecturas diferenciales en diciembre de 2024, enero de 2025 y febrero de 2025"; (3) "[i]ncumplimiento en registrar las lecturas de las presiones utilizando importantes dígitos en la centena en diciembre de 2024, enero de 2025 y febrero de 2025"; (4) "[i]ncumplimiento en registrar todas las lecturas del indicador de presión diferencial en los informes de diciembre de 2024 y de enero de 2025; (5) "[i]ncumplimiento en monitorear y registrar la temperatura diaria del biogás en la entrada del Sistema de Tratamiento de Gases del Vertedero para diciembre de 2024"; y (6) "[i]ncumplimiento en informar las temperaturas de biogás en la entrada del Sistema de Tratamiento de Gases del Vertedero en el informe mensual de diciembre de 2024". La NOV cita al 6 de diciembre de 2024 como fecha de las presuntas violaciones.

Chiquita recientemente recibió esta NOV y continúa evaluando y comprendiendo las supuestas violaciones. Chiquita proporcionará una explicación detallada y una acción correctiva en el informe de seguimiento.

SOV de DTSC – Explicación y Acción Correctiva

El 1 de abril de 2025, Chiquita recibió una SOV del DTSC denunciando violaciones de 22 "CCR" § 66262.17(a)(9), 22 CCR § 66262.251 y del Código de Salud y Seguridad ("HSC") § 25189.2(b). La SOV alega específicamente que CCL: (1) "no cumplió con los requerimientos de restricción del terreno"; (2) "no minimizó la posibilidad de una liberación de constituyentes de desechos peligrosos al aire, al suelo o a aguas superficiales que puedan amenazar la salud humana o al medioambiente"; y (3) "no minimizó la posibilidad de una liberación de desechos peligrosos o constituyentes de desechos peligrosos al aire, suelo o aguas superficiales, que puedan amenazar la salud humana o el medioambiente".

Chiquita recientemente recibió esta SOV y continúa evaluando y comprendiendo las supuestas violaciones. Chiquita proporcionará una explicación detallada y una acción correctiva en el informe de seguimiento.

Por favor, comuníquese conmigo si tiene alguna pregunta sobre este informe.

Sr. David Nguyen
Obras Públicas del Condado de Los Ángeles
4 de abril de 2025
Página 5 de 5

Atentamente,



Steve Cassulo
Gerente de Distrito
Chiquita Canyon, LLC

Adjunto: A - Regla 402 del AQMD de la Costa Sur y Código de Salud y Seguridad de California § 41700
B – NOV P80892 del AQMD de la Costa Sur
C - SOV de DTSC

cc: Karlo Manalo, Obras Públicas
Ai-Viet Huynh, Departamento de Planificación Regional
Alex Garcia, Departamento de Planificación Regional
Edgar De La Torre, Departamento de Planificación Regional
Eric Morofuji, Departamento de Salud Pública
Mark Como, Departamento de Salud Pública

ATTACHMENT A



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

P 68828

NOTICE OF VIOLATION

DATE OF VIOLATION		
Month:	Day:	Year:
03	04	2025

Facility Name: CHUQUITA 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	☒ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR	RULE 402			FOR DISCHARGING SUCH QUANTITIES OF AIR CONTAMINANTS TO CAUSE INJURY, DETRIMENT, NUISANCE OR ANNOYANCE TO A CONSIDERABLE NUMBER OF PERSONS
2	☐ SCAQMD ☒ CH&SC ☐ CCR ☐ CFR	CAL NOS CODE 41700			FOR DISCHARGING SUCH QUANTITIES OF AIR CONTAMINANTS TO CAUSE INJURY, DETRIMENT, NUISANCE OR ANNOYANCE TO A CONSIDERABLE NUMBER OF PERSONS
3	☐ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR				
4	☐ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR				
5	☐ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR				

Served To: STEVE CASSULO	Phone: 661-371-9214	Served By: DANIEL DEL ROSARIO	Date Notice Served: 03-04-2025
Title: DISTRICT MANAGER	Email: STEVEN.CASSULO@WASTECONNECTIONS.COM	Phone No: ☒ 909-396-2062 ☐ 310-233-	Email: DDELROSARIO@aqmd.gov

*Key to Authority Abbreviations:

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

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

Method of Service:

☒ In Person

☐ Certified Mail

VIOLATOR'S COPY



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

P 81011

NOTICE OF VIOLATION

DATE OF VIOLATION		
Month:	Day:	Year:
3	5	2025

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

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

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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	☒ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR	402			For discharging such quantities of air contaminants to cause injury, detriment, nuisance or annoyance to a considerable number of persons.
2	☐ SCAQMD ☒ CH&SC ☐ CCR ☐ CFR	41700			
3	☐ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR				
4	☐ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR				
5	☐ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR				

Served To:	Steven Cassulo	Phone:	661-371-9214	Served By:	Gerardo Vergara	Date Notice Served:	
Title:	District Manager	Email:	steven.cassulo@wasteconnections.com	Phone No.:	☒ 909-396-2179 ☐ 310-233-	Email:	gvergara@aqmd.gov

*Key to Authority Abbreviations:

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

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

Method of Service:

☐ In Person

☒ Certified Mail

VIOLATOR'S COPY



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

P 80047

NOTICE OF VIOLATION

DATE OF VIOLATION		
Month	Day	Year
03	11	2025

Facility Name: Chiquita Canyon Landfill	Facility ID#: 119219	Sector: UB
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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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	☒ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR	Rule 402			For discharging such quantities of air contaminants to cause injury, detriment, nuisance, or annoyance to a considerable number of persons.
2	☐ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR	California H&S code sec 41700			
3	☐ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR				
4	☐ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR				
5	☐ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR				

Served To: Steve Cassulo	Phone: 661-371-9214	Served By: Daniel Rosas	Date Notice Served: 03/11/2025
Title: District Manager waste connections	Email: stevec@coms	Phone No: ☒ 909-396-2080 ☐ 310-233-	Email: drozas@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

& electronic mail



NOTICE OF VIOLATION

P 74050

DATE OF VIOLATION		
Month:	Day:	Year:
3	17	25

Facility Name: <i>Chiquita Canyon Landfill</i>		Facility ID#: <i>119219</i>		Sector: <i>U13</i>
Location Address: <i>29201 Henry Mayo Dr</i>		City: <i>Costa Mesa</i>		Zip: <i>92626</i>
Mailing Address: <i>29201 Henry Mayo Dr</i>		City: <i>Costa Mesa</i>		Zip: <i>92626</i>

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

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

DESCRIPTION OF VIOLATIONS

#	Authority*	Code Section or Rule No.	SCAQMD Permit to Operate or CARB Registration No.	Condition No. (If Applicable)	Description of Violation
1	☒ SCAQMD ☐ CH&SC ☐ CCR ☐ 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	☐ SCAQMD ☒ CH&SC ☐ CCR ☐ 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	☐ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR				
4	☐ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR				
5	☐ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR				

Served To: <i>Steve Cassulo</i>	Phone: <i>661 371 9204</i>	Served By: <i>Aaron Penhauser</i>	Date Notice Served: <i>3/17/25</i>
Title: <i>District Manager</i>	Email:	Phone No: ☒ 909-396-2513 ☐ 310-233-	Email: <i>apenhauser@aqmd.gov</i>
		Method of Service: ☐ In Person ☒ 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



South Coast Air Quality Management District
21605 DORLEY DRIVE, DIAMOND BAR, CA 91765-4378

P 73579

NOTICE OF VIOLATION

DATE OF VIOLATION		
Month	Day	Year
03	21	25

FIRM NAME CHIUQUITA CANYON LLC		PHONE NO. 119 219	CITY VB
Location Address 29201 HENRY MAYO DR	City CASTAIC	Zip 91384	
Location 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 PROVER, 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

No.	Activity	Code Section (if applicable)	SCAQMD District Code or CAA/CFR Regulation No.	Penalties No. (if applicable)	Description of Violation
1	☒ SCAQMD ☐ CHASC ☐ CCR ☐ CFR	Rule 402			For discharging such quantities of air contaminants as cause injury, detriment, nuisance or annoyance to considerable number of persons
2	☐ SCAQMD ☒ CHASC ☐ CCR ☐ CFR	Ch 8 SC 41750			For discharging such quantities of air contaminants as cause injury, detriment, nuisance or annoyance to considerable number of persons
3	☐ SCAQMD ☐ CHASC ☐ CCR ☐ CFR				
4	☐ SCAQMD ☐ CHASC ☐ CCR ☐ CFR				
5	☐ SCAQMD ☐ CHASC ☐ CCR ☐ CFR				

Name of STEVE CASSULO	Phone 661.371.9214	Name of BILLY ANTONIO	Date Notice Sent 03/21/25
Title DISTRICT MANAGER	Work Email Steve.Cassulo@connections.com	Phone No. ☒ 909-396-2682 ☐ 310-233-	Email bantonio@aqmd.gov

Method of Service ☐ In Person ☒ Certified Mail

ORIGINAL



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

P 64624

NOTICE OF VIOLATION

DATE OF VIOLATION		
Month:	Day:	Year:
D3	24	25

Facility Name: Chiquita Canyon LLC		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	

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

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DESCRIPTION OF VIOLATIONS

#	Authority*	Code Section or Rule No.	SCAQMD Permit to Operate or CARB Registration No.	Condition No. (If Applicable)	Description of Violation
1	☒ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR	402			For discharging such quantities of air contaminants to cause injury, nuisance or annoyance to a considerable number of persons.
2	☐ SCAQMD ☒ CH&SC ☐ CCR ☐ CFR	41700			11
3	☐ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR				
4	☐ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR				
5	☐ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR				

Served To: Steven Cassulo		Phone: 661 371 9214	Served By: Arelly Gil Rojas	Date Notice Served: 3/24/25
Title: District Manager	Email: Steven.cassulo@wastecorrections.com	Phone No: ☒ 909-396-2153 ☐ 310-233-	Email: arojas	@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: ☐ In Person ☒ Certified Mail	

ORIGINAL



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

P 79640

NOTICE OF VIOLATION

DATE OF VIOLATION		
Month	Day	Year
03	25	2025

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

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

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

DESCRIPTION OF VIOLATIONS

#	Authority*	Code Section or Rule No.	SCAQMD Permit to Operate or CARB Registration No.	Condition No. (If Applicable)	Description of Violation
1	☒ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR	402			For discharging such quantities of air contaminants to cause injury detriment nuisance or annoyance to considerable number of persons.
2	☐ SCAQMD ☒ CH&SC ☐ CCR ☐ CFR	41700			For discharging such quantities of air contaminants to cause injury detriment nuisance or annoyance to considerable number of persons.
3	☐ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR				
4	☐ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR				
5	☐ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR				

Served To: Steve Cassulo		Phone: 661-571-9214		Served By: Abnil Alberto		Date Notice Served: 03/25/2025	
Title: District Manager		Email: steve.c@wasteconnections.com		Phone For: ☒ 909-396-2318 ☐ 310-233-		Email: aalberto@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: ☐ In Person ☒ Certified Mail	

ORIGINAL



NOTICE OF VIOLATION

DATE OF VIOLATION		
Month:	Day:	Year:
4	3	25

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

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

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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	☒ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR	402			For discharging such quantities of air contaminants to cause injury, detriment, nuisance or annoyance to a considerable number of persons
2	☐ SCAQMD ☒ CH&SC ☐ CCR ☐ CFR	41700			
3	☐ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR				
4	☐ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR				
5	☐ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR				

Served To:	Steve Cassulo	Phone:	661-371-9214	Served By:	Christina Ojeda	Date Notice Served:	4-3-25
Title:	District Manager	Email:	Steven.cassulo@wasteconnection.com	Phone No:	☒ 909-396-2475 ☐ 310-233-	Email:	cojeda@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: email

☐ In Person

☒ Certified Mail

ORIGINAL

ATTACHMENT B



NOTICE OF VIOLATION

DATE OF VIOLATION		
Month:	Day:	Year:
12	6	24

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

YOU ARE HEREBY NOTIFIED THAT YOU HAVE BEEN CITED FOR ONE OR MORE VIOLATIONS OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT (SCAQMD) RULES, STATE LAW OR FEDERAL LAW. IF PROVEN, SUCH VIOLATION(S) MAY RESULT IN THE IMPOSITION OF CIVIL OR CRIMINAL PENALTIES.
EACH DAY A VIOLATION OCCURS MAY BE HANDLED AS A SEPARATE OFFENSE REGARDLESS OF WHETHER OR NOT ADDITIONAL NOTICES OF VIOLATION ARE ISSUED.

DESCRIPTION OF VIOLATIONS

#	Authority*	Code Section or Rule No.	SCAQMD Permit to Operate or CARB Registration No.	Condition No. (If Applicable)	Description of Violation
1	☐ SCAQMD ☒ CH&SC ☐ CCR ☐ CFR	42401	Order for Abatement Case No. 6177-4	78	Failure to complete installation of a liner of 60 mil polyethylene sheeting (or other equivalent flexible membrane cover) for each leachate tanks and/or tank farms within 120 days of this Order
2	☐ SCAQMD ☒ CH&SC ☐ CCR ☐ CFR	42401	Order for Abatement Case No. 6177-4	68	Failure to maintain tanks under negative pressure as demonstrated by differential readings in December 2024, January 2025 and February 2025
3	☐ SCAQMD ☒ CH&SC ☐ CCR ☐ CFR	42401	Order for Abatement Case No. 6177-4	68	Failure to record pressure readings using significant digits to the hundredths place in December 2024, January 2025 and February 2025
4	☐ SCAQMD ☒ CH&SC ☐ CCR ☐ CFR	42401	Order for Abatement Case No. 6177-4	8 & 68	Failure to record all required differential pressure gauge readings in the December 2024 and January 2025 monthly reports
5	☐ SCAQMD ☒ CH&SC ☐ CCR ☐ CFR	42401	Order for Abatement Case No. 6177-4	3(a)	Failure to monitor and record daily landfill gas temperature at the inlet of the Landfill Gas Treatment System for December 2024
6	☐ SCAQMD ☒ CH&SC ☐ CCR ☐ CFR	42401	Order for Abatement Case No. 6177-4	8(d)	Failure to report landfill gas temperatures at inlet of the Landfill Gas Treatment System in the monthly report for December 2024

Served To: Steve Cassulo	Phone: 661-371-9214	Served By: Christina Ojeda	Date Notice Served: 04/01/2025
Title: District Manager	Email: steven.cassulo@wasteconnections.com	Phone No: ☒ 909-396-2475	Email: cojeda@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 ☒ Electronic Mail

What is a Notice of Violation?

A Notice of Violation is issued by an SCAQMD Air Quality Inspector to inform a business that a failure to comply with one or more applicable federal, state, and/or local (SCAQMD) air pollution rules and regulations or legal requirements is being alleged.

What happens when I receive a Notice of Violation?

If you are operating in violation of one or more applicable federal, state, and/or local (SCAQMD) air pollution rules and regulations or legal requirements, each day or part of a day that you operate in violation is considered a separate violation even if only one Notice of Violation has been issued. Continuing to operate in violation may subject you to substantial civil or criminal penalties. **It is in your best interest to resolve any compliance problem immediately before you resume operation.**

What if I need to continue to operate the equipment named in the Notice of Violation?

If continued operation of equipment cited in the Notice of Violation is necessary, you may be able to obtain a variance from SCAQMD's Hearing Board. A **variance** is an administrative order that allows a company to continue operating without penalties while it takes appropriate steps to meet air pollution control requirements. Proof of specific legal circumstances must be provided before a variance can be granted. Timeliness in seeking such relief will be considered by the Hearing Board. Additional information concerning variances can be found in California Health & Safety Code §§ 42350-42359.5 and at <http://www.aqmd.gov/home/about/hearing-board>.

During a hearing for a variance, you may be represented either by yourself or by your attorney or consultant. You will have the opportunity to present evidence and testimony, and to cross-examine any SCAQMD witness.

If you fail to comply with any order of the Hearing Board, you may be subject to additional civil or criminal penalties set forth in California Health & Safety Code §§ 42400 *et seq.* and 42402 *et seq.*

How are Notices of Violation resolved?

The SCAQMD General Counsel's office reviews each alleged violation and, based on the facts, determines how best to resolve the allegation. Options available to the General Counsel's office include:

- **Minor Source Penalty Assessment Program**

Certain Notices of Violation may be eligible for resolution through SCAQMD's Minor Source Penalty Assessment Program if they are issued to a minor source or for violations other than emitting air toxics or creating a

public nuisance involving injury or property damage.

If your case is handled by this program, you will receive a letter or phone call from an investigator in the SCAQMD General Counsel's office offering to settle your violation. Settlement terms usually call for a penalty payment and written proof of current compliance. The investigator's name and telephone number are included in the initial settlement letter in the event you would like to discuss the case.

Be prepared to describe any facts about the violation that you believe SCAQMD should know in considering your case. Sharing your knowledge of the facts, possible causes for the violation and plans to avoid future violations will help the investigator arrive at an appropriate disposition. **Be sure to respond by the date indicated in the letter to avoid further legal action.**

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

- **Civil Prosecution**

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

- **Criminal Prosecution**

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

Civil and Criminal Penalties

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

Available Resources

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

Contact Numbers	Useful Links
General Information:	
SCAQMD Headquarters General Number (909) 396-2218	About SCAQMD http://www.aqmd.gov/home/about
General Counsel's Office (909) 396-3400	Enforcement Authority http://www.aqmd.gov/home/about/authority/enforcement
	Compliance Notices http://www.aqmd.gov/home/regulations/compliance/compliance-notices
	SCAQMD Rules http://www.aqmd.gov/home/regulations/rules
Obtaining Permit or Billing Information:	
Small Business Assistance (800) 388-2121	Getting Permits http://www.aqmd.gov/home/permits
Permit Information (909) 396-2468	Permit Forms http://www.aqmd.gov/home/permits/permit-application-forms
Billing Services (866) 888-8838 (909) 396-2900	Permitting Fees http://www.aqmd.gov/home/permits/fees
Variances:	
Clerk of the Hearing Board (909) 396-2500	The Hearing Board http://www.aqmd.gov/home/about/hearing-board

ATTACHMENT C



Yana Garcia
Secretary for
Environmental Protection



Department of Toxic Substances Control

Katherine M. Butler, MPH, Director
7575 Metropolitan Drive, Suite 108
San Diego, California 92108

<https://dtsc.ca.gov/>



Gavin Newsom
Governor

SUMMARY OF VIOLATIONS

On or before April 1, 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 Numbers: 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 exist 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: 4/1/2025



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

SUMMARY OF VIOLATIONS

Facility Name: Chiquita Canyon, LLC; Chiquita Canyon, Inc;
Waste Connections US, Inc. **Date:** 4/1/2025

BACKGROUND

Chiquita Canyon Landfill (CCL or Landfill) is a 639-acre Class III non-hazardous municipal solid waste (MSW) landfill located in the northern portion of the County of Los Angeles. CCL has experienced, and continues to experience, a Subsurface Elevated Temperature (SET) event, which has resulted in excessive leachate production, significant landfill ground settlement over a short period of time¹, and release of noxious odors.

Chiquita Canyon, LLC, Chiquita Canyon, Inc., and Waste Connections US, Inc. operate CCL, including managing, directing, and conducting operations related to hazardous waste.

On November 2, 2023, December 12–13, 2023, and February 20 and 27, 2024, DTSC conducted or participated in multi-agency site visits at CCL. During the December 12, 2023 site visit, DTSC collected samples of landfill leachate and determined the samples exceeded Resource Conservation and Recovery Act (RCRA) and California hazardous waste regulatory levels for benzene. Subsequent sampling by CCL has also shown regulatory hazardous waste threshold exceedances in leachate and/or condensate at CCL.

Various regulatory agencies, including DTSC, are actively involved with overseeing CCL as part of the Multi-Agency Critical Action Team (MCAT). The MCAT also includes agencies such as the United States Environmental Protection Agency (US EPA), California Environmental Protection Agency (CalEPA), South Coast Air Quality Management District (South Coast AQMD), California's Department of Resources Recycling and Recovery (CalRecycle), Los Angeles Regional Water Quality Control Board (Los Angeles RWQCB), California Air Resources Board (CARB), California Office of Environmental Health Hazard Assessment (OEHHA), and the Los Angeles County Departments of Public Health, Regional Planning and Public Works. The Los Angeles

¹ Landfill ground settlement is generally defined as the vertical displacement of waste as a result of compression and waste degradation. According to [monthly reports](#) submitted by CCL to the South Coast AQMD as required per Condition 8 of the South Coast AQMD Abatement Order, accelerated settlement of the landfill surface is defined as approximately six inches or greater within a 60-day period, and cracks in the landfill cover.



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County Department of Public Health, Solid Waste Management Program, is certified to act as the Local Enforcement Agency (LEA) by CalRecycle.

On February 15, and March 29, 2024, DTSC issued two Summaries of Violation (SOV) to CCL identifying alleged violations of the California Hazardous Waste Control Act (Health & Safety Code (HSC) sec. 25100, et seq.; also known as HWCL). Per the SOV dated February 15, 2024, DTSC alleges that CCL failed to minimize the possibility of a release of hazardous waste or hazardous waste constituents, which included a compliance requirement to report all releases of hazardous waste to DTSC.

On September 6, 2023, the South Coast AQMD Hearing Board approved an Order for Abatement that required CCL to take actions to reduce odors from the Landfill that have impacted the community. Pursuant to this Order for Abatement, CCL submits reports summarizing Landfill leachate leak, spill, and seep information. Additionally, pursuant to the Los Angeles RWQCB's Monitoring and Reporting Program (No. CI-6231), CCL is required to report leachate seeps. The reports submitted to South Coast AQMD and the Los Angeles RWQCB are published on CCL's website (<https://chiquitacanyon.com/odor-mitigation/>).

CCL has also submitted hazardous material spill reports to the California Governor's Office of Emergency Services (CalOES), which are published to the CalOES Spill Release Reporting Dashboard (<https://www.caloes.ca.gov/office-of-the-director/operations/response-operations/fire-rescue/hazardous-materials/spill-release-reporting/>).

On March 28, 2025, CalRecycle transmitted a letter to the LEA with a Technical Memorandum from Dr. Stark dated February 26, 2025, which included an analysis of the current SET event conditions at CCL and remedial recommendations. The Technical Memorandum indicates that the SET event has migrated from the western slope to the eastern side of the Landfill where Tank Farm #9 is located. Tank Farm #9 stores and treats hazardous waste leachate on-site.

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

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

VIOLATION # 1

Violation Citation:

California Code of Regulations (Cal. Code Regs.), title 22, section 66262.17(a)(9), A large quantity generator may accumulate hazardous waste on site without a permit or



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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:

...
(9) Land disposal restrictions. The large quantity generator shall comply with all applicable requirements under chapter 18 of this division.

Relevant Citations:

Cal. Code Regs., tit. 22, div. 4.5, ch. 18, § 66268.7(a), Requirements for generators:

(1) A generator of hazardous waste shall determine if the waste has to be treated before it can be land disposed. This is done by determining if the hazardous waste meets the treatment standards in article 4 or article 11 of this chapter...

Cal. Code Regs., tit. 22, § 66268.40(a), A prohibited waste identified in the table "Treatment Standards for Hazardous Wastes" may be land disposed only if it meets the requirements found in the table²...

Cal. Code Regs., tit. 22, § 66268.40(e), For characteristic wastes (D001-D043) that are subject to treatment standards in the following table "Treatment Standards for Hazardous Wastes," and are not managed in a wastewater treatment system that is regulated under the federal Clean Water Act (CWA), that is federal CWA-equivalent, or that is injected into a Class I nonhazardous deep injection well, all underlying hazardous constituents (as defined in section 66260.10) shall meet Universal Treatment Standards, found in section 66268.48, Table Universal Treatment Standards, prior to land disposal as defined in section 66260.10 of this division.

Health and Safety Code (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 11, 2024, CCL failed to comply with land disposal restriction requirements. On November 10 and 11, 2024, shipment of three loads of leachate from one of CCL's leachate tanks (Tank #172) were disposed of at Red Rock Landfill located at 22316 South Harmon Road, Florence, Arizona 85132. Prior to the shipment of the three loads, CCL sampled Tank #172. The leachate loads were

² [Cal. Code Regs., tit. 22, § 66268.40 Table](#)



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solidified and disposed of at Red Rock Landfill prior to CCL receiving the test results. On November 12, 2024, sample results from Tank #172 showed a methyl ethyl ketone (MEK) concentration of 39 mg/L, in exceedance of the nonwastewater Universal Treatment Standard for MEK of 36 mg/kg. On November 27, 2024, CCL sent a notification letter to Red Rock Landfill acknowledging these shipments exceeded the applicable LDR treatment standard for MEK (attached as Exhibit A).

Violation Classification:

This is a class 1 violation.

Compliance Requirement:

CCL shall comply with all applicable requirements for land disposal restrictions. Within 30 days of this SOV, CCL shall provide the lab results for all samples collected from Tank #172 on November 2 and 9, 2024. CCL shall also provide a written description of the "Tank Release" program and a copy of the Standard Operating Guideline referenced in CCL's November 27, 2024 notification letter to Red Rock Landfill.

VIOLATION # 2A

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 March 17, 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/>) and the CalOES Spill Release Reporting Dashboard (attached to this SOV as Exhibit B). DTSC was not directly notified by CCL of these alleged releases as required per the Summary of Violations issued by DTSC to CCL on February 15, 2024.

The individual releases that form the basis for this Violation #2A are attached as counts 1 – 42 in Exhibit C.



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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 72 hours of all releases, and for each individual release, CCL shall send a Release Notification to the Department, attention to Erin Neal (Erin.Neal@dtsc.ca.gov) and Zana Zmily (Zanalee.Zmily@dtsc.ca.gov). This Release Notification shall include the substance involved, the date and time of the release, the grid location and coordinates of the release, a detailed description of the release source (including, if applicable, tank number, tank train identification, dewatering bin identification, or well number), the cause of the release, the volume of the release, the duration of presence of the release, the waste determination of the release and any contaminated material that results from the mitigation of the release, sampling results (if applicable), photographs of the release, list of agencies notified of the release, and corrective actions taken, including the on-site disposition and intended final destination of all recovered material and/or waste, and any contaminated media (i.e., tank farm number, train identification, tank number, grid number, and roll-off bin). All sample results for releases shall be sent to the Department within 48 hours of CCL receiving laboratory reports.

Within 30 days of this SOV, CCL shall provide complete Release Notifications for each release listed in Exhibit C, to the extent this information was not previously included in the reports posted on CCL's website or on the CalOES Spill Release Reporting Dashboard.

Within 30 days of this SOV, CCL shall also provide a written explanation of 1) mitigation measures taken to prevent future releases, 2) any additional mitigation measures currently planned to address releases, and 3) any plan for future mitigation measures should the prior or currently planned mitigation measures prove ineffective at minimizing releases.

VIOLATION # 2B

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.



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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:

Beginning on or before February 17, 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. Per CCL's February 25, 2025 Weekly Report on the Documentation and Tracking of Cover Issues to the LEA, fissures, tension cracks, and a sinkhole were observed in grids 147, 148, and 154 (grids adjacent to Tank Farm #9) (attached as Exhibit D). Based on maps CCL reports weekly, Tank Farm #9 is located on fill in grids 32, 53, 59, 81, 82, 148, 149, and 153, which is the north-central, northeast side of the Landfill (attached as Exhibit I). The Geo-Logic Associates' February 2025 Fissure and Tension Crack Monitoring Summary dated March 10, 2025 provides a map overview of cracks and fissures reported in February 2025 (attached as Exhibit D).

CalRecycle's letter dated March 28, 2025 with the Technical Memorandum from Dr. Stark addresses expansion of the SET event into and settlement under Tank Farm #9 (attached as Exhibit D). Per Dr. Stark's Technical Memorandum, elevated temperatures (185 °F to 189 °F) surround the leachate tank farm, indicating this area will undergo significant settlement due to thermal breakdown of buried waste. In addition, CCL's February 25, 2025 Weekly Report confirms that settlement has started to occur around the leachate tank farm. Dr. Stark's Technical Memorandum also states that grid 147 "experienced a significant sinkhole, which indicates a significant thermal breakdown of buried waste that resulted in a void developing below the interim soil cover."

Tank Farm #9 contains a treatment system that treats hazardous waste leachate. As of February 2025, Tank Farm #9 contains over one hundred 20,000-gallon capacity leachate storage tanks that store hazardous waste leachate, leachate that has been treated below hazardous waste regulatory thresholds, and condensate. Significant settlement may have a negative impact on the integrity and/or stability of these tanks and associated ancillary equipment, (e.g., piping collecting and diverting hazardous waste leachate to treatment) which could result in hazardous waste leachate releases. As a result, CCL has 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 by treating and/or storing hazardous waste leachate, leachate with hazardous waste constituents, and condensate in Tank Farm #9.

Violation Classification:

This is a class I violation.



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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. CCL shall not treat and/or store hazardous waste leachate, treated leachate, and hazardous waste condensate in areas that are impacted, or have the potential to be impacted by, significant settlement and/or high subsurface temperatures which reasonably could result in significant settlement. All tanks and ancillary equipment involved in the treatment and storage of hazardous waste or hazardous waste constituents must be managed properly to prevent the possibility of a release. Per day penalties apply for each day that the facility remains in violation.

Within 30 days of this SOV, CCL shall provide a written statement, including without limitation photographs documenting how the facility returned to compliance. Prior to implementation, CCL shall notify the Department in writing of all leachate and condensate tank movement. CCL shall consider criteria provided by CalEPA on March 6, 2025 when relocating leachate and condensate tanks. In addition, CCL shall provide up-to-date, annotated Landfill maps of leachate and/or condensate collection, treatment, and storage areas. These maps shall include accurate and current labeling of tank numbers, well heads, and piping. Tank farm maps shall accurately designate which tanks hold hazardous and treated leachate and/or condensate, as well as the associated leachate train of origin. These tank farm and gas/leachate collection well maps shall be sent to the Department, attention to Erin Neal (Erin.Neal@dtsc.ca.gov) and Zana Zmily (Zanalee.Zmily@dtsc.ca.gov), every 1st Tuesday of each month.

CCL shall also send isopach maps, Landfill settlement maps, and maximum vertical temperature maps from temperatures probes on a weekly basis to the Department, attention to Erin Neal (Erin.Neal@dtsc.ca.gov) and Zana Zmily (Zanalee.Zmily@dtsc.ca.gov).

SECTION II: OTHER ISSUES/CONCERNS

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

1. CCL has notified CalOES, South Coast AQMD, and RWQCB of leachate and/or condensate releases on-site through [CalOES Spill Reports](#), the [South Coast AQMD Abatement Order](#) Condition 27(c) Weekly Leachate Inspection Reports, the [South Coast AQMD Abatement Order](#) Condition 27(e) Leak Reports, and the [RWQCB Leachate Seep Reports](#) (attached as Exhibit F). However, DTSC has not been directly notified by CCL of these releases which may have involved hazardous waste leachate and/or condensate. CCL shall notify DTSC, attention



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to Erin Neal (Erin.Neal@dtsc.ca.gov) and Zana Zmily (Zanalee.Zmily@dtsc.ca.gov), of all releases of leachate and condensate within 72 hours of each incident. Releases may include, but are not limited to, spills, geysers, leaks, and seeps. Release Notifications shall include all information listed in the Compliance Requirement section of Violation #2A above. Within 30 days of this SOV, CCL shall provide Release Notifications for each individual incident listed in Exhibit E 1 through 96 attached and all releases to-date that are not listed in either Exhibit C or Exhibit E.

2. Per CalOES Spill Report #24-4177, CCL released 200 gallons of sodium hydroxide 50% solution with water onto the ground on July 22, 2024 (attached as Exhibit G). According to the report, the release occurred when a 275-gallon tote slipped off a flat-bed tractor while it was being unloaded. Within 30 days of this SOV, CCL shall 1) provide the safety data sheet for the sodium hydroxide solution spilled, 2) provide a description of the incident, cleanup actions, and the final destination of contaminated absorbent, impacted dirt, and all other impacted media, and 3) any and all sample results associated with this incident.
3. Per CalOES Spill Report #24-3493, 50 gallons of diesel fuel were released onto the ground, impacting the soil on the side of State Route 126 on June 19, 2024 (attached as Exhibit H). A third-party tractor trailer freight truck punctured its 50-gallon saddle tank when it struck an unknown object at CCL. Per the report, the spill was not stopped or contained, and no CalOES update report is available for this incident. Within 30 days of this SOV, CCL shall provide a detailed description of the spill location, the cleanup actions taken, and the final destination of impacted dirt and all other impacted media.
4. CCL asserts ongoing on-site hazardous waste leachate treatment is conducted under the immediate response exemption pursuant to Cal. Code Regs. tit. 22, §§ 66264.1(g)(8)(A)2, 66265.1(e)(11)(A)2, and 66270.1(c)(3)(A)2. CCL has not provided sufficient information to DTSC to support the continued use of the immediate response exemption. CCL shall continue, without delay, working toward obtaining the appropriate authorization to treat hazardous waste leachate on-site.
5. CCL is required to ensure waste determinations are conducted at the point of generation, as required per Cal. Code Regs., tit. 22, § 66262.11. In May 2024, CCL provided waste determinations for six categories of leachate generated at the facility. In November 2024, CCL updated the waste determination for “Group B” leachate from non-hazardous to hazardous. Since May 2024, CCL has installed approximately 118 additional leachate pumps. With the expansion of the SET event and dewatering system, DTSC is concerned that CCL’s 2024 waste determinations may not accurately reflect the current composition of the leachate



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at the facility. Within 30 days, CCL shall provide current waste determination information for all leachate waste generated at the facility.

ATTACHMENTS:

Exhibit A: Violation #1 Supporting Documents (contains the November 27, 2024 notification letter from CCL to Red Rock Landfill)

Exhibit B: Violation #2A 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 email correspondence)

Exhibit C: Table 1 – Violation #2A Counts

Exhibit D: Violation #2B Supporting Documents (contains CalRecycle's March 28, 2025 letter to the LEA with the February 26, 2025 Technical Memorandum from Dr. Stark, Geo-Logic Associates March 10, 2025 Summary, and CCL's February 25, 2025 Weekly Report on the Documentation and Tracking of Cover Issues to the LEA)

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

Exhibit F: Other Issues/Concerns #1 Supporting Documents (contains CalOES reports, CCL's South Coast AQMD Abatement Order reports, CCL's RWQCB reports, and email correspondence)

Exhibit G: Other Issues/Concerns #2 Supporting Documents (contains CalOES reports)

Exhibit H: Other Issues/Concerns #3 Supporting Documents (contains CalOES report)

Exhibit I: CCL Satellite Grid Map