



April 4, 2025

***Via E-Mail***

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

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

Dear Mr. Nguyen:

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

In 2025, the South Coast Air Quality Management District (“South Coast AQMD”) issued Chiquita NOVs for violations of South Coast AQMD Rule 402 and California Health & Safety Code § 41700, triggering Chiquita’s obligation to provide a report under CUP Condition 69. Chiquita submitted a report on February 28, 2025. Since the submission of the February 28 report, South Coast AQMD issued Chiquita eight additional Rule 402 NOVs for violations alleged to have occurred in March and April 2025. These NOVs are provided in Attachment A.<sup>1</sup>

On April 1, 2025, South Coast AQMD issued Chiquita NOV P80892 for alleged violations of California Health & Safety Code § 42401 and Conditions 3(a), 8, 8(d), 68, and 78 of the Stipulated Order for Abatement with the South Coast AQMD (Case No. 6177-4) issued on September 6, 2023, and modified on January 17, March 21, April 24, August 27, and November 13, 2024 (“Stipulated Order”). This NOV is provided in Attachment B.

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<sup>1</sup> The NOV numbers and dates of the alleged violations are as follows: NOV P68828 (March 4, 2025); NOV P81011 (March 5, 2025); NOV P80047 (March 11, 2025); NOV P74050 (March 17, 2025); NOV P73579 (March 21, 2025); NOV P64624 (March 24, 2025); NOV P79640 (March 25, 2025); and NOV P80893 (April 3, 2025).

On April 1, 2025, the Department of Toxic Substances Control issued Chiquita a Summary of Violations (“SOV”) for alleged violations of 22 California Code of Regulations (“CCR”) § 66262.17(a)(9), 22 CCR § 66262.251, and Health and Safety Code (“HSC”) § 25189.2(b). This SOV is provided in Attachment C.

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

A discussion of the South Coast AQMD Rule 402 NOVs, along with corrective actions taken by Chiquita in response to the NOVs, is provided below.

#### **Explanation**

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

#### **Corrective Action**

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

**South Coast AQMD Stipulated Order:** Under the Stipulated Order, Chiquita has implemented the following additional mitigation measures:

- Chiquita is continuing to improve the landfill gas well system by installing temperature probes in wells. As of March 28, 2025, Chiquita has installed 32 temperature probes since the start of installation on February 26, 2024.
- As of March 28, 2025, Chiquita has a total of 136 pumps operating in vertical landfill gas extraction wells.

Chiquita submits status updates on its compliance with the modified Stipulated Order in its Condition 8 monthly reports to South Coast AQMD. These reports are posted on Chiquita’s website. More detailed information on Chiquita’s implementation of and compliance with the modified Stipulated Order is available on Chiquita’s website.

**LEA Compliance Order:** On June 6, 2024, the LEA issued Chiquita a Compliance Order, formalizing the CalRecycle-recommended mitigation measures that had previously been

imposed by the LEA as well as a few additional requirements. Chiquita has implemented the following additional requirement from the LEA's Compliance Order:

- On March 17, 2025, Chiquita submitted the weekly cover issues report. The report, summary, and maps are posted on Chiquita's Odor Mitigation website.

More detailed information on Chiquita's implementation of the Compliance Order is available on Chiquita's website.

Enhanced community air monitoring program: As described in prior reports, at the direction of the DPH, Chiquita has enhanced its current air monitoring program. Data and reports can be found on Chiquita's website and the most recent report was submitted on February 21, 2025. Chiquita has also established a Chiquita Canyon Landfill Community Air Monitoring Program Webpage. <https://chiquitacanyon.com/reports/community-air-monitoring-program/>. The page contains the most recent 1-hour average data for hydrogen sulfide and methane, as well as the average wind speed and direction for the same time period, for twelve community air monitoring stations.

Chiquita Canyon Landfill Air Quality Study: As described in prior reports, a third-party consultant has conducted a 28-day air quality study that provided additional data and information on air quality in the communities surrounding the Landfill. Data from this study can be found on Chiquita's Air Quality Study webpage (<https://chiquitalandfillairqualitydata.sensible-edp.com/>). Third-party consultants evaluated this data and prepared reports on potential health and odor impacts based on the data collected and analyzed. These reports were submitted to South Coast AQMD on August 1, 2024, as required by the Stipulated Order, and are posted on Chiquita's website. An easy-to-read summary of the report is also available on Chiquita's website.

Chiquita Community Relief Program: As described in prior reports, Chiquita voluntarily established a Community Relief Program to assist with offsetting costs associated with odor mitigation and has retained a third-party administrator to administer this program. Through the program, residents of Val Verde, Live Oak, Hasley Hills, Hillcrest Parkway, Hasley Canyon, and Stevenson Ranch were able to request funding that could be used to assist with the claimed expenses associated with odor mitigation, including temporary relocation, home hardening, and increased utility bills. This was not a reimbursement program. Instead, applicants that submitted valid, geographically eligible applications received a payment each month that they could use as needed, similar to a stipend. Payment amounts varied among applicants based on a variety of factors, including geographic location and Chiquita's assessment of the extent of odor impacts based on objective odor data.

Applications for funding for each month were due at the end of the month. Applicants were required to recertify their applications to be eligible for funding in subsequent months. Chiquita ended the Community Relief Program at the end of February 2025. Most recently, checks were mailed out during the week of March 21 for eligible applicants that submitted new valid applications in the month of February, valid recertifications, and those that had corrected application materials from their previous applications.

Mr. David Nguyen  
Los Angeles County Public Works  
April 4, 2025  
Page 4 of 5

More information on this program is available on the program's website (<https://www.chiquitalandfillcommunityrelief.com/>). The forms and information are also available in Spanish.

### **South Coast AQMD NOV P80892 – Explanation and Corrective Action**

On April 1, 2025, Chiquita received an NOV from South Coast AQMD alleging violations of California Health & Safety Code § 42401 and Conditions 3(a), 8, 8(d), 68, and 78 of the Stipulated Order. The NOV specifically alleges: (1) “[f]ailure to complete installation of a liner of 60 mil polyethylene sheeting (or other equivalent flexible membrane cover) for each leachate tank and/or tank farms within 120 days of this Order”; (2) “[f]ailure to maintain tanks under negative pressure as demonstrated by differential readings in December 2024, January 2025 and February 2025”; (3) “[f]ailure to record pressure readings using significant digits to the hundredths place in December 2024, January 2025 and February 2025”; (4) “[f]ailure to record all required differential pressure gauge readings in the December 2024 and January 2025 monthly reports”; (5) “[f]ailure to monitor and record daily landfill gas temperature at the inlet of the Landfill Gas Treatment System for December 2024”; and (6) “[f]ailure to report landfill gas temperatures at inlet of the Landfill Gas Treatment System in the monthly report for December 2024”. The NOV cites December 6, 2024 as the date of the alleged violations.

Chiquita recently received this NOV and is still evaluating and understanding the alleged violations. Chiquita will provide a detailed explanation and corrective action in follow-up reporting.

### **DTSC SOV – Explanation and Corrective Action**

On April 1, 2025, Chiquita received an SOV from DTSC alleging violations of 22 CCR § 66262.17(a)(9), 22 CCR § 66262.251, and Health and Safety Code (“HSC”) § 25189.2(b). The SOV specifically alleges CCL: (1) “failed to comply with land restriction requirements”; (2) “failed to minimize the possibility of a release of hazardous waste constituents to air, soil or surface water which could threaten human health or the environment”; and (3) “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.”

Chiquita recently received this SOV and is still evaluating and understanding the alleged violations. Chiquita will provide a detailed explanation and corrective action in follow-up reporting.

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

Mr. David Nguyen  
Los Angeles County Public Works  
April 4, 2025  
Page 5 of 5

Sincerely,

*Steven J Cassulo*

Steve Cassulo  
District Manager  
Chiquita Canyon, LLC

Attachment: A – South Coast AQMD Rule 402 and California Health & Safety Code § 41700  
B – South Coast AQMD NOV P80892  
C – DTSC SOV

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

# ATTACHMENT A



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

P

68828

# NOTICE OF VIOLATION

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

Facility Name:	Facility ID#:	Sector:
CHIQUITA CANYON LANDFILL	119219	VB
Location Address:	City:	Zip:
29201 HENRY MAYO DRIVE	CASTAIC	91384
Mailing Address:	City:	Zip:
29201 HENRY MAYO DRIVE	CASTAIC	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			<u>FOR DISCHARGING SUCH QUANTITIES OF AIR CONTAMINANTS TO CAUSE INJURY, DETERIMENT, NUISANCE OR ANNOYANCE TO A CONSIDERABLE NUMBER OF PERSONS</u>
2	<input type="checkbox"/> SCAQMD <input checked="" type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	CAL NO 5 CODE 41700			<u>FOR DISCHARGING SUCH QUANTITIES OF AIR CONTAMINANTS TO CAUSE INJURY, DETERIMENT, 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:	Phone:	Served By:	Date Notice Served:
STEVE CASSULOR	661-371-9214	DANIEL DEL ROSARIO	03-04-2025
Title: DISTRICT MANAGER	Email: STEVEN.CASSULOR@WASTECONNECTIONS.COM	Phone No: <input checked="" type="checkbox"/> 909-396-2062 <input type="checkbox"/> 310-233-	Email: DELROSARIO@aqmd.gov

\*Key to Authority Abbreviations:

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

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

Method of Service:

In Person  
 Certified Mail



South Coast Air Quality Management District  
21865 COBLEY 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	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	4102			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:  Steven Cassulo  District Manager	Phone:  661-371-9214  steven.cassulo@waveconnections.com	Served By:  Gerardo Vergara  Phone No:  <input checked="" type="checkbox"/> 909-396-2179 <input type="checkbox"/> 310-233-2179  Email:  gvergara @ aqmd.gov	Date Notice Served:
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\*Key to Authority Abbreviations:

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

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

Method of Service:

In Person  Certified Mail



# NOTICE OF VIOLATION

P 80047

DATE OF VIOLATION		
Month:	Day:	Year:
03	11	2025

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

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	<b>Rule 902</b>			<b>For discharging such quantities of air contaminants to cause injury, detriment, nuisance, or annoyance to a considerable number of persons.</b>
2	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	<b>California H.S. code Sec 41700</b>			
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: <b>Steve Cassulo</b>	Phone: <b>661-371-9214</b>	Served By: <b>Daniel Rosas</b>	Date Notice Served: <b>03/11/2025</b>
Title: <b>District Manager waste connections</b>	Email: <b>steveca9@comcast.net</b>	Phone No: <input checked="" type="checkbox"/> 909-396-2080 <input type="checkbox"/> 310-233-	Email: <b>dro9as@aquad.gov</b>

\*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:

Chiquita Canyon Landfill

Facility ID#:	119219	Sector:
Zip:	91384	
Zip:	91384	

Location Address:

29201 Henry Mayo Dr

City:

Castaic

Mailing Address:

29201 Henry Mayo Dr

City:

Castaic

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

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## DESCRIPTION OF VIOLATIONS

#	Authority*	Code Section or Rule No.	SCAQMD Permit to Operate or CARB Registration No.	Condition No. (If Applicable)	Description of Violation
1	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	402			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			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:	Phone:	Served By:	Date Notice Served:
Steve Cassola District Manager	661 371 9214	Aaron Neuhauser	3/17/05
Title:	Phone No:	Email:	
	<input checked="" type="checkbox"/> 909-396-3513 <input type="checkbox"/> 310-233-	<input checked="" type="checkbox"/> aoneuhauer aoneuhauer	@aqmd.gov

\*Key to Authority Abbreviations:

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

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

Method of Service:  
 In Person  Certified Mail

ORIGINAL



South Coast Air Quality Management District  
21665 CUPLEY DRIVE, DIAMOND BAR, CA 91765-4178

P 73579

# NOTICE OF VIOLATION

DATE OF VIOLATION		
03	21	25

TO THE SUBJECT:

CHIQUITA CANYON LLC

TO THE DATE:

109-219 VS

29201 HENRY MAYO DR

CASTAIC

91384

29201 HENRY MAYO DR

CASTAIC

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

Violation	Code Section or Rule(s)	SCAQMD Permit Number or DAIR/Designation	Permit No. or Agreement	Description of Violation
1 <input checked="" type="checkbox"/> Ozone <input type="checkbox"/> CO2 <input type="checkbox"/> OTR	Rule 402			For discharging such quantities of air contaminants to cause injury, detriment, nuisance or annoyance to undesirable number of persons
2 <input checked="" type="checkbox"/> Ozone <input type="checkbox"/> CO2 <input type="checkbox"/> CO <input type="checkbox"/> OTR	61 8 SL 44700			For discharging such quantities of air contaminants to cause injury, detriment, nuisance or annoyance to undesirable number of persons
3 <input type="checkbox"/> SCAQMD <input type="checkbox"/> CHASC <input type="checkbox"/> CO2 <input type="checkbox"/> OTR				
4 <input type="checkbox"/> SCAQMD <input type="checkbox"/> CHASC <input type="checkbox"/> CO2 <input type="checkbox"/> OTR				
5 <input type="checkbox"/> SCAQMD <input type="checkbox"/> CHASC <input type="checkbox"/> CO2 <input type="checkbox"/> OTR				

Named By:

STEVE CASSULO

Phone:

661-371-9244

Named By:

BILLY ARROYO

Date Notice Issued:

03/21/25

Position:

GENERAL MANAGER

Steve Cassulo  
connections.com

Phone:

909-396-2682  
 310-233-

Email:

bantoline @ sqmd.gov

Method of Service:

In Person  
 Certified Mail

SCAQMD - South Coast Air Quality Management District  
CO2 - Certified Mail or Personal Service

CHASC - California Health and Safety Code  
OTR - Office of Trade Regulation

ORIGINAL



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

# NOTICE OF VIOLATION

P 64624

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

Facility Name:	Chiquita Canyon LLC	Facility ID#:	119219
Location Address:	29201 Henry Mayo Dr	City:	Castaic
Mailing Address:	29201 Henry Mayo Drive	City:	Castaic

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

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## DESCRIPTION OF VIOLATIONS

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

Served To:	Steven Cassulo	Phone:	661 371 9214	Served By:	Arely Gil Rojas	Date Notice Served:	3/24/25
Title:	District Manager	Email:	steven.cassulo@westconnections.com	Phone No:	<input checked="" type="checkbox"/> 909-396-2153 <input type="checkbox"/> 310-233-	Email:	aryojas @ aqmd.gov

\*Key to Authority Abbreviations:

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

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

Method of Service:

In Person

Certified Mail

ORIGINAL



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

P 79640

# NOTICE OF VIOLATION

DATE OF VIOLATION		
Month	Day	Year
03	25	2025

Facility Name: <b>Chiquita Canyon LLC</b>	Facility ID: <b>119219</b>	Sector: <b>VB</b>
Location Address: <b>29201 Henry Mayo Prive</b>	City: <b>Castaic</b>	Zip: <b>91384</b>
Mailing Address: <b>29201 Henry Mayo Drive</b>	City: <b>Castaic</b>	Zip: <b>91384</b>

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

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## DESCRIPTION OF VIOLATIONS

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

Served To: <b>Steve Cassuto</b>	Phone: <b>661.271.9214</b>	Served By: <b>Abri Alberto</b>	Date Notice Served: <b>03/25/2025</b>
Title: <b>District Manager</b>	Email: <b>steve.ca@wasteconnections.com</b>	Phone No: <input checked="" type="checkbox"/> 909-396-2318 <input type="checkbox"/> 310-233-	Email: <b>abri.alberto@aqmd.gov</b>
*Key to Authority Abbreviations: SCAQMD - South Coast Air Quality Management District CCR - California Code of Regulations			Method of Service: <input type="checkbox"/> In Person <input checked="" type="checkbox"/> Certified Mail

ORIGINAL



# NOTICE OF VIOLATION

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

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

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	<b>402</b>			<u>For discharging such quantities of air contaminants to cause injury, detriment, nuisance or annoyance to a considerable number of persons</u>
2	<input type="checkbox"/> SCAQMD <input checked="" type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	<b>41700</b>			
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: <b>Steve Cassulo</b>	Phone: <b>661-371-9214</b>	Served By: <b>Christina Ojeda</b>	Date Notice Served: <b>4-3-25</b>
Title: <b>District Manager</b>	Email: <b>steven.cassulo@wasteconnection.com</b>	Phone No: <b><input checked="" type="checkbox"/> 909-396-2475 <input type="checkbox"/> 310-233-</b>	Email: <b>cojeda @ aqmd.gov</b>

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

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 type="checkbox"/> SCAQMD <input checked="" type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	42401	Order for Abatement Case No. 6177-4	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	<input type="checkbox"/> SCAQMD <input checked="" type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	42401	Order for Abatement Case No. 6177-4	68	Failure to maintain tanks under negative pressure as demonstrated by differential readings in December 2024, January 2025 and February 2025
3	<input type="checkbox"/> SCAQMD <input checked="" type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	42401	Order for Abatement Case No. 6177-4	68	Failure to record pressure readings using significant digits to the hundredths place in December 2024, January 2025 and February 2025
4	<input type="checkbox"/> SCAQMD <input checked="" type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	42401	Order for Abatement Case No. 6177-4	8 & 68	Failure to record all required differential pressure gauge readings in the December 2024 and January 2025 monthly reports
5	<input type="checkbox"/> SCAQMD <input checked="" type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	42401	Order for Abatement Case No. 6177-4	3(a)	Failure to monitor and record daily landfill gas temperature at the inlet of the Landfill Gas Treatment System for December 2024
6	<input type="checkbox"/> SCAQMD <input checked="" type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	42401	Order for Abatement Case No. 6177-4	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: <b>Steve Cassulo</b>	Phone: <b>661-371-9214</b>	Served By: <b>Christina Ojeda</b>	Date Notice Served: <b>04/01/2025</b>
Title: <b>District Manager</b>	Email: <b>steven.cassulo@wasteconnections.com</b>	Phone No: <input checked="" type="checkbox"/> <b>909-396-2475</b>	Email: <b>cojeda@aqmd.gov</b>

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

# 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  
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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 time<sup>1</sup>, 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

<sup>1</sup> 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 table<sup>2</sup>...

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

<sup>2</sup> [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](mailto:Erin.Neal@dtsc.ca.gov)) and Zana Zmily ([Zanalee.Zmily@dtsc.ca.gov](mailto: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.



## Department of Toxic Substances Control

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San Diego, CA 92108

### 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](mailto:Erin.Neal@dtsc.ca.gov)) and Zana Zmily ([Zanalee.Zmily@dtsc.ca.gov](mailto:Zanalee.Zmily@dtsc.ca.gov)), every 1<sup>st</sup> 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](mailto:Erin.Neal@dtsc.ca.gov)) and Zana Zmily ([Zanalee.Zmily@dtsc.ca.gov](mailto: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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7575 Metropolitan Drive, Suite 108  
San Diego, CA 92108

to Erin Neal ([Erin.Neal@dtsc.ca.gov](mailto:Erin.Neal@dtsc.ca.gov)) and Zana Zmily ([Zanalee.Zmily@dtsc.ca.gov](mailto: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