



Yana Garcia
Secretary for
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Department of Toxic Substances Control

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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



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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