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Secretary for
Environmental Protection



Department of Toxic Substances Control

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Gavin Newsom
Governor

June 20, 2025

Sent by E-mail to: Steven.Cassulo@WasteConnections.com

Steve Cassulo, District Manager
Chiquita Canyon Landfill
29201 Henry Mayo Drive
Castaic, California 91384

RE: DTSC AND CHIQUITA CANYON LANDFILL'S JUNE 18, 2025 COMPLIANCE REQUIREMENTS MEETING

Mr. Cassulo,

This letter memorializes the June 18, 2025, discussion between the Department of Toxic Substances Control ("DTSC") and Chiquita Canyon Landfill ("CCL") regarding the compliance requirements associated with the Summary of Violations ("SOV") issued on April 1, 2025.

If CCL agrees to comply with the revised compliance requirements outlined in this letter, the information requested herein will be due by Friday, July 25, 2025, unless otherwise specified. Please note that these revised compliance requirements do not replace or supersede any local, state, or federal laws and/or regulations that CCL is subject to.

Violation 1:

Regarding Violation #1 in the SOV, DTSC informed CCL that the documentation submitted satisfied the compliance requirements and no further action is required. CCL shall continue to comply with land disposal restriction requirements.

Violation 2A:

Release Notifications

CCL will continue to send the following agency reports to DTSC: AQMD SOFA Condition 27(e) Spill/Leak Reports, AQMD SOFA Condition 27(c) Leachate Inspection Logs, Waterboard 7-Day WDR Reports, and Waterboard 30-Day Storm Event Reports.

In lieu of a separate Release Notification to DTSC, to the extent reasonably possible, CCL will include in these agency reports the following additional information: the estimated release cleanup time and a waste determination identifying if the release is

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hazardous, treated non-hazardous, or characteristically non-hazardous. If applicable to the release, CCL will also make good faith efforts to include the tank number, well number, and train identification associated with the release. If photographs are taken for a release, these will either be included in AQMD's report or provided to DTSC separately within 72 hours of the release. If a release is sampled, all sampling results will be provided to DTSC within 48 hours of CCL receiving these results.

Information Request for SOV Violation 2A Counts

CCL will review the following information requests, determine whether the requested information is available for these specific counts, and provide a response.

Please provide the following information for the 12 counts listed below. If the requested information is not available, please provide an explanation of the efforts taken to identify this information and why this information was not available for each relevant instance.

1. Count 3 (3/13/2025) – Train identification
2. Count 5 (1/23/2025) – Tank number and train identification
3. Count 7 (1/6/2025) – Tank number and train identification
4. Count 19 (10/24/2024) – Tank number and train identification
5. Count 23 (10/17/2024) – Tank number and train identification
6. Count 26 (10/9/2024) – Train identification
7. Count 30 (9/8/2024) – Tank number and train identification
8. Count 31 (9/8/2024) – Well number and train identification
9. Count 33 (9/4/2024) – Well number and train identification
10. Count 40 (2/19/2024) – Well number
11. Count 41 (2/7/2024) – Estimated volume and cause of release
 - a. Condensate spill – as provided in the SOV as Exhibit B – Violation #2A Supporting Documents – V2AC41, CCL's South Coast AQMD 2/13/2024 Leachate Inspection Report. Please see the last three sentences in the paragraph on the first page. The report identifying Count 41 was shown to CCL as requested in CCL's written response and was acknowledged by CCL.
12. Count 42 (1/31/2024) – Tank number

Information Requests for Releases since April 1, 2025

CCL will review the following information requests, determine whether the requested information is available for the specific release, and provide a response.

Please provide the following information for seven releases listed below that have occurred since the issuance of DTSC's April 1, 2025 SOV. If the requested information is not available, please provide an explanation of the efforts taken to identify this information and why this information was not available for each relevant instance.

1. 6/19/2025 release – Tank number and train identification
2. 6/16/2025 release – Tank number

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3. 6/12/2025 release (at 0800 hours) – Tank number
4. 6/11/2025 release – Hazardous waste manifest for the shipment
5. 5/27/2025 release – Well number and train identification
6. 5/21/2025 release – Train identification
7. 4/10/2025 release – Train identification
8. 4/8/2025 release – Train identification

Releases involving Hauler Trucks

CCL shall provide a thorough, detailed written plan of how CCL will mitigate and prevent releases involving hauler trucks. For all releases that have occurred since April 1, 2025 involving hauler trucks in any capacity, DTSC expects CCL to review and evaluate their mitigation measures and identify additional mitigation measures to minimize future releases. CCL shall also consider updating its standard operating guidelines for tank releases in the tank farms to include additional mitigation measures identified.

Violation 2B:

Written Statement within 30 Days and Tank Farm Movement Notification

A written statement within 30 days of issuance of the SOV and Tank Farm Movement Notification are no longer required under DTSC's April 1, 2025, SOV. Instead, CCL shall continue to cooperate with DTSC's Site Mitigation Program, submit deliverables, and complete tasks related to the Tank Farm #9 relocation in a timely manner, and forward copies of all relevant reports, including the implementation report for the Tank Farm #9 relocation, to Erin Neal at Erin.Neal@dtsc.ca.gov and Zana Zmily at Zanalee.Zmily@dtsc.ca.gov. Should CCL fail to cooperate with DTSC's Site Mitigation Program regarding deliverables related to Tank Farm #9 relocation, DTSC will reinstate the compliance requirement of a written statement and photographs documenting compliance with Violation 2B.

Well Field and Tank Farm Maps

In lieu of the monthly requirement to submit well field and tank farm maps, CCL shall submit well field and tank farm maps to DTSC on a quarterly basis, with the first submission to be provided on July 25, 2025. Going forward, CCL shall submit these maps to DTSC by the 20th day after the start of the quarter.

Well field maps shall include an up-to-date map of all active wells with well numbers and shall identify which wells are associated with which train (Group A, Group B, Group C, etc). An example was shared with CCL during the meeting of the "Existing De-watering System Map" dated November 13, 2024 (See Attachment 1).

Tank farm maps shall include up-to-date maps of each tank farm and identify each tank number. These submissions shall accurately designate which tanks hold hazardous leachate, hazardous condensate, and treated leachate, as well as the associated leachate train of origin (Group A, Group B, Group C, etc). An example was shared with CCL during the meeting of the maps and table submitted on June 11, 2025 to South Coast AQMD (See Attachment 2).

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Isopach, Landfill Settlement, and Maximum Vertical Temperature Maps

In lieu of providing the isopach maps, landfill settlement maps, and maximum vertical temperature maps from temperature probes on a weekly basis, CCL shall submit these maps to DTSC at the frequency prescribed by the Local Enforcement Agency ("LEA") in accordance with their requirements. CCL shall copy Erin Neal at Erin.Neal@dtsc.ca.gov and Zana Zmily at Zanalee.Zmily@dtsc.ca.gov to the Mitigation Measure 2B emails that are submitted to the LEA. Dylan Clark at Dylan.Clark@dtsc.ca.gov can be removed from these emails.

Other Issues #1:

CCL will review the following information requests for the incidents referenced in paragraph 1 of DTSC's April 1, 2025 SOV Other Issues section, determine whether the requested information is available for these specific incidents, and provide a response.

Please provide the following information for the 18 incidents listed below. If the requested information is not available, please provide an explanation of the efforts taken to identify this information and why this information was not available for each relevant instance.

1. Incident 1 (3/22/2025) – Train identification
2. Incident 3 (2/25/2025) – Well number and train identification
3. Incident 4 (2/9/2025) – Train identification
4. Incident 8 (1/20/2025) – Train identification
5. Incident 13 (12/22/2024) – Train identification and explanation of release cause
6. Incident 16 (10/25/2024) – Tank number, train identification, grid location, and description of release cleanup
7. Incident 17 (10/24/2024) – Tank number and train identification
8. Incident 19 (10/18/2024) – Tank number and train identification
9. Incident 30 (9/7/2024) – Well number and train identification
10. Incident 36 (7/23/2024) – Tank number, train identification, and grid location
11. Incident 45 (5/14-15/2024) – Explain what infrastructure was removed during this incident
12. Incident 46 (5/14/2024) – Well number, leachate volume, and train identification
13. Incident 50 (5/2/2024) – Train identification
14. Incident 51 (5/1/2024) – Train identification
15. Incident 52 (4/23/2024) – Well number and train identification
16. Incident 54 (4/11/2024) – Train identification
17. Incident 62 (3/26/2024) – Well number
18. Incident 71 (3/3/2024) – Well number

The compliance requirements outlined in this letter supersede the compliance requirements addressed in DTSC's April 1, 2025 SOV. Please communicate your acceptance of these revised compliance requirement terms in writing by June 27, 2025.

Steve Cassulo
Chiquita Canyon Landfill
June 20, 2025

If you have any questions or concerns, please contact me (Erin.Neal@dtsc.ca.gov) or my supervisor Zana Zmily (Zanalee.Zmily@dtsc.ca.gov).

Thank you,

Erin Neal

Erin Neal
Senior Environmental Scientist (Specialist)
Office of Criminal Investigations
Erin.Neal@dtsc.ca.gov

Attachments:

1. November 13, 2024 CCL Existing De-watering System Map
2. June 11, 2025 AQMD Application Correspondence with Maps

Cc by E-mail:

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