



CHIQUITA CANYON

A Waste Connections Company

January 15, 2026

Via E-Mail

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**Re: Chiquita Canyon, LLC Response to Allegation #1 of November 18, 2025
Summary of Violations**

Dear Ms. Neal and Ms. Zmily:

Chiquita Canyon, LLC (“Chiquita”) submits this letter in further response to the Summary of Violations (“SOV”) for the Chiquita Canyon Landfill (“Landfill”) issued by the Department of Toxic Substances Control (“DTSC”) on November 18, 2025.¹

On December 10, 2025, Chiquita requested an extension of time to respond to the SOV because of the voluminous nature of the requested actions therein and the timing of the requests over the holiday season. On December 15, 2025, DTSC granted the extension request with respect to Allegation #1 to January 15, 2026. On December 18, 2025, Chiquita provided interim responses regarding Allegations #2 and #3, as well as the allegations contained in a section entitled “Other Issues/Concerns” in the SOV, a copy of which is attached hereto as **Attachment 1**. Chiquita also noted that it would provide proof that the condensate manifests at issue for Allegation #2 had been corrected in e-Manifest, as well as a map of tanks T1/T2 and their associated piping.

¹ Chiquita Canyon, LLC is the sole owner, operator, and permit holder at Chiquita Canyon Landfill. Chiquita Canyon, Inc. and Waste Connections US, Inc. are not part of the facility name, nor do they manage, direct, or conduct operations at the facility as alleged in the SOV.

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Chiquita provides the manifest correction proof as **Attachment 2** and intends to submit the requested map by January 23, 2026. Accordingly, Chiquita responds to only Allegation #1 hereinafter.

As discussed below, Chiquita disputes the allegations set forth in the SOV and requested actions. Chiquita has provided voluminous and timely information about the Landfill to its regulators and continues to do so. Chiquita will continue to cooperate with reasonable requests for information that are within the scope of DTSC's authority and applicable to the Landfill.

Chiquita provides the following information in the interest of continued cooperation with DTSC. The information, documents, and attachments provided herein should not be construed as an admission of any factual allegation or legal conclusion in the SOV or an admission of any liability for any matter described in the SOV.

Allegation #1 – Failure to Minimize the Possibility of a Release of Hazardous Waste

Summary of DTSC Allegation:

DTSC asserts that Chiquita violated 22 CCR § 66262.251 by allegedly failing 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. DTSC lists 27 individual incidents that form the basis for this allegation.

Chiquita Response to Allegation:

Chiquita denies that it violated 22 CCR § 66262.251, as alleged by DTSC, for several reasons. First, that provision does not currently apply to Chiquita (and did not apply during the time of the individual incidents cited by DTSC). Compliance with Section 66262.251 is a "condition for exemption" from permitting requirements under Section 66262.17. Specifically, Section 66262.17(a)(6) states that one of the conditions for that exemption is that "[t]he large quantity generator complies with the standards in article 9 of this chapter." And, Section 66262.251 is contained in Article 9. EPA has acknowledged that the "minimize release" provision is merely a condition for exemption, stating that "[t]he condition for exemption for LQGs at [40 CFR] § 262.17(a)(6)-(7) [the federal counterpart to 22 CCR § 66262.17(a)(6)] references 40 CFR part 262 subpart M [the federal counterpart to Article 9]." (*See* 81 Fed. Reg. at 85,790). Chiquita is not (and has not been) required to meet the conditions for the LQG accumulation exemption from permitting set forth at Section 66262.17 because it is already covered by a different permitting exemption, namely the Immediate Response Exemption. Chiquita cannot have "violated" the conditions of an exemption that it did not need.

Second, Chiquita maintains that it nevertheless did comply with Section 66262.251. That provision states, in its entirety, that "[a] large quantity generator shall maintain and operate its facility to:

- (1) minimize the possibility

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- (2) of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents
- (3) to air, soil, or surface water
- (4) which could threaten human health or the environment ” (numbering added).

Each of these elements must be evaluated in assessing a potential violation:

- The provision only addresses releases from the “*facility*,” which is defined for these purposes as “all contiguous land and structures, other appurtenances, and improvements on the land used for the treatment, transfer, storage, resource recovery, disposal or recycling of *hazardous waste*.” (See 22 CCR § 66260.10 (emphasis added)). Thus, any releases from non-hazardous waste units are not relevant.
- The LQG is required only to “*minimize the possibility*” of covered releases, not to eliminate them entirely. It is well established that the occurrence of a release does not necessarily indicate that a generator failed to meet this requirement. (See, e.g., *U.S. v. Environmental Waste Control, Inc.*, 710 F. Supp. 1172, 1237 (N.D. Ind. 1989) (“40 C.F.R. § 265.31 [a federal provision with essentially the same language as Section 66262.251] ...is not violated simply by a sporadic fire. The regulation requires the implementation of procedures designed to minimize fire. The occurrence of a single fire, quickly contained, does not persuade the court that EWC did not implement such procedures”), *aff’d*, 917 F.2d 327 (7th Cir. 1990); *cert. denied*, 499 U.S. 975 (1991)).
- The only releases that must be minimized under this provision are releases of “*hazardous waste or hazardous waste constituents*.” (See 22 CCR § 66262.251 (emphasis added)). Releases of non-hazardous wastes are not relevant under the provision.
- Only releases “*to air, soil, or surface water*” are covered. Indeed, a “release” is defined for these purposes as “spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing *into the environment*.” (See 22 CCR § 66260.10 (emphasis added)). Accordingly, releases that are contained do not implicate Section 66262.151.
- Only releases that could “*threaten human health or the environment*” are addressed by the provision. Thus, very small releases, and even larger releases that are quickly cleaned up, are not covered.

Chiquita has reviewed each of the 27 incidents referenced by DTSC in SOV Exhibit A, in light of the limited nature of § 66262.251, notwithstanding the fact that the Immediate Response Exemption applies to each incident. All of these incidents are also outside the scope of the provision for one or more of the following reasons:

- (1) The release did not involve hazardous material;
- (2) The release involved a small volume of material and therefore posed no significant threat to human health or safety, or the environment;
- (3) The release was promptly contained and therefore did not constitute a release into the environment;
- (4) The release did not exit a “facility” within the definition of that term;

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- (5) The release did not leave secondary containment and therefore posed no significant threat to human health or safety or the environment, and did not constitute a release into the environment.

To the extent that any of the incidents could potentially be deemed to be releases of the type addressed by § 66262.251, such incidents would have been isolated and would not negate the fact that Chiquita has implemented numerous procedures designed to minimize releases—which, as noted above, is all that the provision requires.

Since January 2024, dedicated staff members have conducted inspections for the presence of leachate seeps and pooling in the Reaction Area and stormwater channels pursuant to Condition 27(b) of the Stipulated Order for Abatement in Case No. 6177-4 (“SOFA”), issued by the South Coast Air Quality Management District (“South Coast AQMD”). These inspections have been documented and reported to the South Coast AQMD on a weekly and monthly basis, as required by SOFA Condition 27(c) and Condition 8(q)(iii). In the event a seep or pooling occurs, Chiquita immediately collects and contains any standing liquids in a sealed tanker truck or leachate tank or redirects the liquid into the leachate collection system, in accordance with SOFA Condition 24. Chiquita also reports incidents in which liquid leaves the Landfill’s footprint to the Los Angeles Regional Water Quality Control Board (the “Water Board”) pursuant to Chiquita’s Waste Discharge Requirements (“WDRs”). In response to the Unilateral Administrative Order (“UAO”), issued by EPA on February 21, 2024, Chiquita has also developed a Leachate Management Plan (“LMP”), which identifies practices to implement in the event a seep is discovered. Some measures outlined in the LMP include constructing containment structures to prevent leachate from traveling, ensuring the availability of cleaning equipment (e.g., vacuum trucks), and continued monitoring to prevent reoccurrence.

To decrease and combat seeps at the Landfill, Chiquita completed the West Slope Toe Drain Installation Project and North Slope Termination Project to better mitigate leachate seepage. As part of the projects, Chiquita installed a new toe drain and removed and replaced the temporary scrim liner that covered the area with 30-mil geomembrane liner. Since completing the projects in 2025, Chiquita has seen a significant decrease in seeps.²

As of August 28, 2024, under SOFA Condition 27(e), Chiquita is required to report the occurrence of leachate spills or leaks to South Coast AQMD. The majority of spills and leaks are mitigated on the day they occur. On October 18, 2024, pursuant to SOFA Condition 27(f), Chiquita developed Standard Operating Procedures (“SOPs”) for leachate tank operations in accordance with industry standards and best management practices. These SOPs outline procedures for tank filling and tank inspections conducted by Chiquita personnel, and establish leachate transfer guidelines. As discussed further below, Chiquita has updated its leachate

² In addressing steps that have been taken to minimize or respond to leachate seeps from the Landfill, Chiquita is in no way suggesting that any such seeps or associated pooling would implicate the requirement under Section 66262.251 to minimize releases, even if that requirement did apply. For example, because the Landfill manages only non-hazardous wastes, seeps from the Landfill are not from the “facility,” which as noted above is limited to units used to manage hazardous wastes.

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management SOPs to account for the consolidation of its leachate accumulation and treatment tanks into Tank Farm 13.

Since the installation of Tank Farm 13 and additional efforts by Chiquita, the amount of liquid spilled or leaked has been trending downward. Chiquita also continues to expand its dewatering efforts to remove liquids from the Landfill pursuant to SOFA Conditions 17 and 18.³

The “minimize release” provision in Section 66262.251 does not currently apply to Chiquita (and has not applied throughout the period covered by DTSC’s allegation), because it is a condition for an exemption that the facility does not currently need (and has not needed during the relevant period). Chiquita nevertheless has satisfied the requirement to minimize releases. Accordingly, DTSC’s Allegation #1 is without merit.

Summary of DTSC Prescribed Actions:

- (i) DTSC states that Chiquita must operate its facility in a manner that minimizes the possibility of a sudden or non-sudden release of hazardous waste or hazardous waste constituents.
- (ii) DTSC further directs that Chiquita, by January 15, 2026, provide DTSC with a written plan that describes the efforts Chiquita takes to operate its facility in a manner that minimizes the possibility of the release of hazardous waste and hazardous waste constituents. DTSC requests that Chiquita assess the releases documented in this SOV and include in the written plan a description of current and future measures that Chiquita will implement to prevent releases of hazardous waste and hazardous waste constituents. The current and future measures shall include, but are not limited to, process improvements for minimizing releases involving human errors (including third-party contractors), leachate management system design, pipe maintenance/construction, trucks, equipment malfunctions/failures, and releases involving pipes, tanks, wells, sumps, and pumps. DTSC states that it is not “adequate” for the plan mentioned above to simply reference the LMP or materials prepared for other agencies.

Chiquita Response to DTSC Prescribed Actions:

The actions prescribed by DTSC with respect to Allegation 1 are without foundation, given that the allegation is without merit, as discussed above. Nevertheless, in the interest of cooperation and transparency, Chiquita also addresses each of DTSC’s prescribed actions, as outlined below.

- (i) As described in detail above, Chiquita has implemented and will continue to implement procedures designed to minimize the possibility of a sudden or non-sudden release of hazardous

³ In addressing steps that have been taken to minimize or respond to leaks or spills from leachate tanks, Chiquita is in no way suggesting that any or all such leaks or spills would implicate the requirement under Section 66262.251 to minimize releases, even if that requirement did apply. For example, some of the leachate from the Landfill is non-hazardous, and therefore any leaks or spills of such leachate would not be a release of a hazardous waste or hazardous waste constituent potentially within the scope of the referenced provision.

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waste or hazardous waste constituents from the facility into air, soil, or surface water that could threaten human health or the environment.

(ii) To the extent that DTSC may be suggesting that Chiquita must prepare an entirely new plan for minimizing releases that does not reference the LMP or materials prepared for other agencies, Chiquita strongly objects to such duplication of effort. Indeed, DTSC's own regulations discourage duplication in similar contexts. *See, e.g.*, 22 CCR § 66262.261(b) ("If the generator has already prepared a Spill Prevention, Control, and Countermeasures (SPCC) Plan ... or some other emergency or contingency plan, it need only amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the standards of this part"); § 66262.17(a)(7)(A)(1) ("For facility employees that receive emergency response training pursuant to Occupational Safety and Health Administration regulations ..., the large quantity generator is not required to provide separate emergency response training pursuant to this section, provided that the overall facility training meets all the conditions of exemption in this section"). To the extent that DTSC may believe Chiquita's plans could be improved, Chiquita is willing to discuss any provisions that the Department may have concerns with.

Chiquita is providing copies of its recently updated SOPs for Tank Farm 13 prepared for South Coast AQMD, as well as information on corrective actions taken in response to the leachate releases alleged in DTSC's SOV and a summary of recent steps Chiquita has taken to improve its leachate management system.

Updated SOPs

Chiquita has consolidated and relocated its tank farms for accumulating and treating hazardous leachate. There is now only one tank farm for accumulating and treating hazardous leachate, Tank Farm 13, which was designed to minimize the risk of spills and other releases, and to appropriately contain and address any that may occur. The entirety of Tank Farm 13 is on a 60-millimeter liner to prevent releases to the soil. Tank Farm 13 consists of three separate sections:

- The first section of Tank Farm 13 is where leachate intake occurs, taking in characteristically hazardous leachate in clarifying tanks and then sending it to residence tanks. This entire section is within a berm and grades to a sump, so any potential leachate leaks are collected and can be pumped out for treatment. This section is double-lined and contains a sump with leak detection.
- The second section contains the carbon treatment area which is double-lined and contains a sump with leak detection. After liquids have gone through treatment, they are sampled and they are piped into the third section.
- The third section contains tanks that store post-treatment, non-hazardous, post-sampled liquids. The sample results are returned, and the liquids are then sent for final disposal. This area is single-lined and stores only non-hazardous liquids.

Chiquita has updated its previous leachate management SOPs for Tank Farm 13. These SOPs encompass the latest procedures for leachate management at the Landfill and integrate best management practices, as well as Chiquita's learned experience. The SOPs for Tank Farm 13

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have been written to incorporate, where appropriate, corrective actions taken in response to leachate spills or leaks and are included as **Attachment 3**.

Together, these SOPs require Chiquita personnel to take significant measures to prevent releases. These measures include: performing an inspection of each leachate tank as required by the specific tank's requirements, ensuring that each tank has available freeboard for the authorized liquids, visually inspecting tanks to confirm there is no visible physical damage prior to transfer, determining the expected fill time, monitoring the sight glass on front of tanks to ensure filling does not surpass tank capacity (if applicable), verifying which trucks are authorized to load and directing drivers to the appropriate loading position, and visually inspecting the tank and area to make sure there were no spills during and after transfer. Chiquita added employees and shifted responsibilities from contractors to employees where possible, to further improve the processes. Chiquita also provides training to employees who are handling leachate, which is refreshed as needed.

Corrective Actions Taken

In addition to incorporating lessons learned from previous incidents into the Tank Farm 13 design and SOPs, Chiquita has implemented a variety of corrective actions to mitigate the possibility of leachate releases, including infrastructure improvements and increasing automation wherever possible. More specifically, these include:

- Retraining Chiquita personnel on leachate system operations, including procedures regarding pump operation and enabling pumps, as well as on proper maintenance procedures.
- Ensuring that third-party contractors provide proper training to their employees on relevant operations, such as securing specific equipment during shift changes.
- Making infrastructure upgrades and improvements such as upgrading pneumatic pumps to Lorentz pumps, which are better suited to certain in-well environments.
- Conducting more routine maintenance, inspections, or actions to prevent potential releases, to include:
 - Using a vacuum truck to collect liquids while performing maintenance on the forcemain.
 - Inspecting the top hatch of haul trucks to ensure they are closed before trucks are allowed to leave the tank farm.
 - Inspecting underneath haul trucks before they exit the facility to ensure there are no leaks.
 - Increasing the frequency of inspection of magnetic flow meters.

Improvements to Leachate Management System

Additionally, Chiquita installed hydrostatic liquid level transmitters to measure the level of liquids within the tanks in all leachate accumulation tanks capable of having such transmitters installed. This allows Chiquita personnel to monitor and communicate tank level information to

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necessary personnel involved before and during tank filling operations, further minimizing the potential for releases.

In sum, Chiquita did not violate 22 CCR § 66262.251. Chiquita has implemented numerous actions, precautions, analyses, and measures to minimize the potential for releases. Chiquita has greatly expanded its personnel training and equipment inspections to prevent human error and reduce the chances of equipment failure/malfunction and releases involving pipes, tanks, wells, sumps, and pumps. Furthermore, as demonstrated by the updated SOPs attached hereto, Chiquita has designed Tank Farm 13 to minimize as much as possible any releases of leachate.

As noted above, Chiquita is providing this information in the interest of continued cooperation with DTSC. The information, documents, and attachments provided herein should not be construed as an admission of any factual allegation or legal conclusion in the SOV or an admission of any liability for any matter described in the SOV. Chiquita remains available to discuss these issues as needed. Please contact me if you have any questions.

Regards,

Kate Logan

Kate Logan
Senior Remediation Project Manager
Chiquita Canyon, Landfill

Enclosures

cc: Ken Habaradas, Los Angeles County Department of Public Health
Robert Ragland, Los Angeles County Department of Public Health
Liza Frias, Los Angeles County Department of Public Health
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Jack Cheng, South Coast Air Quality Management District

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Thanne Berg, Department of Toxic Substances Control
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Re: Chiquita Canyon, LLC Response to November 18, 2025 Summary of Violations

Dear Ms. Neal and Ms. Zmily:

Chiquita Canyon, LLC (“Chiquita”) is in receipt of the Summary of Violations (“SOV”) for the Chiquita Canyon Landfill (“Landfill”) issued by the Department of Toxic Substances Control (“DTSC”) on November 18, 2025.¹ Based on the allegations set forth in the SOV, DTSC requested that Chiquita take certain actions and provide certain information within thirty (30) days of the SOV. Other actions and requests for information did not include an explicit deadline.

As discussed below, Chiquita disputes the allegations set forth in the SOV and the requested actions. Chiquita has provided voluminous and timely information about the Landfill to its regulators and continues to do so. Chiquita will continue to cooperate with reasonable requests for information that are within the scope of DTSC’s authority and applicable to the Landfill.

¹ Chiquita Canyon, LLC is the sole owner, operator, and permit holder at Chiquita Canyon Landfill. Chiquita Canyon, Inc. and Waste Connections US, Inc. are not part of the facility name, nor do they manage, direct, or conduct operations at the facility as alleged in the SOV.

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Chiquita provides the following information in the interest of continued cooperation with its regulators. The information, documents, and attachments provided herein should not be construed as an admission of any factual allegation or legal conclusion in the SOV or an admission of any liability for any matter described in the SOV.

Chiquita notes that this response addresses only Allegations #2 and #3 as well as the “Other Issues/Concerns” raised in the SOV. On December 10, 2025, Chiquita requested an extension of time to respond to the SOV because of the voluminous nature of the requested actions therein and the timing of the requests over the holiday season. On December 15, 2025, DTSC granted the extension request with respect to Allegation #1 to January 15, 2026, so Allegation #1 is therefore not addressed herein. DTSC denied the extension request with respect to the remaining allegations, so Chiquita responds to those allegations to the extent feasible herein.

Allegation #2

Summary of DTSC Allegation:

DTSC alleges that, beginning “on and/or before” October 27, 2025, Chiquita failed to properly complete hazardous waste manifests for hazardous waste condensate. DTSC alleges that such actions violate 22 CCR § 66262.23(a) (requirement to complete and certify hazardous waste manifests) and potentially HSC § 25189.2(a) (false statement or representation in, *inter alia*, a manifest).

Chiquita Response to Allegation:

To the extent that DTSC is alleging improper completion of manifests based on conservative (i.e., over-inclusive) coding of condensate, Chiquita notes that “over-managing” a waste as hazardous is a long-recognized and permissible approach under the hazardous waste regulations where it is intended to ensure protective management of the waste. EPA confirmed in the Generator Improvements Rule that:

Even if the waste may not be hazardous, “over managing” the waste is acceptable and meets the requirements in [40 C.F.R.] § 262.11 [the federal counterpart to 22 CCR § 66262.11] because the generator has made a determination intended to ensure, beyond a doubt, proper and protective management of the waste within the RCRA regulatory program. The practice of over-managing non-hazardous waste as hazardous waste has been in existence for years and EPA’s final language in § 262.11 continues to allow this practice.

See 81 Fed. Reg. 85732, 85750 (Nov. 28, 2016). Chiquita’s use of conservative waste codes was intended to ensure protective management, not to misrepresent the waste or evade regulatory controls. Accordingly, the inclusion of additional waste codes on a manifest, by itself, does not establish a violation of the hazardous waste regulations, let alone a false statement under the Health & Safety Code.

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To the extent that DTSC is alleging improper completion of manifests based on discrepancies between the waste codes on a manifest and on a Waste Stream Documentation Form or a waste profile, Chiquita notes that those documents are not the regulatory benchmark for manifest compliance. The Waste Stream Documentation Form prepared by Chiquita's hazardous waste management consultant, Montrose, reflects Chiquita's waste determination for the condensate and identifies the applicable waste codes pursuant to 22 CCR § 66262.40(c) and 40 C.F.R. § 262.11(f). As explained below, Chiquita has aligned its manifest corrections with that determination. By contrast, the waste profiles are administrative documents generated by Clean Harbors (which coordinates Chiquita's hazardous waste shipments to its own permitted incineration facilities) to support manifest assembly upon waste pick-up and to inform appropriate transportation procedures, but are not themselves required under federal or state law.

To the extent that DTSC is alleging improper completion of manifests based on tank- and shipment-specific analytical results, Chiquita notes that waste determinations and toxicity characteristic designations are based on a "representative sample" of a waste, not on isolated results that may not be representative. *See, e.g.*, 22 CCR § 66261.24(a) (requiring a "representative sample" to characterize a waste as toxic); 40 C.F.R. § 261.24(a) (same). The hazardous waste regulations generally indicate that in order to obtain the requisite "representative sample," there should be "in no case less than four samples, taken over a period of time sufficient to represent the variability or the uniformity of the waste." *See* 40 C.F.R. § 260.22(h), incorporated by reference in 22 CCR § 66261.3(a)(2)(B) (discussing delisting of hazardous wastes). For instance, EPA guidance provides an example where—in the context of a representative sample of analytical data—"it is definitively concluded that [a certain constituent] is not present in [a waste] at a hazardous level" even though two samples were above the regulatory threshold. EPA, "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods" (EPA Publication SW-846), Chapter 9 at 14–17; *see* 22 CCR § 66260.11 (incorporating SW-846 by reference); 22 CCR § 66261.20(c) (stating that the sampling methods described in EPA's SW-846 guidance shall be considered representative). Therefore, an isolated exceedance in an individual grab sample does not, by itself, necessarily support recharacterizing the waste stream or concluding that a new waste determination is required.

Accordingly, the fact that a single sample in June 2025 reflected pyridine slightly above the regulatory threshold (6.4 mg/L versus 5.0 mg/L) did not, standing alone and based on the dataset then available for the condensate waste stream, warrant adding D038 to the manifests for the condensate shipments at issue.

However, on review of the Waste Stream Documentation Form prepared by Montrose, the waste profiles prepared for the condensate waste stream by Clean Harbors, and the associated manifests, Chiquita identified an administrative discrepancy that resulted in omission of the arsenic waste code (D004) from the hazardous condensate manifests. In conducting the waste determination and preparing the Waste Stream Documentation Form, Montrose analyzed nine condensate samples collected over a ten-day period in February 2024. Those analytical results show consistent exceedances of the toxicity characteristic threshold for arsenic (detections ranging from 35 to 50 mg/L, versus a 5.0 mg/L threshold), and Montrose therefore appropriately included D004 on the Waste Stream Documentation Form.

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Chiquita has advised Clean Harbors on multiple occasions that its condensate may contain arsenic above applicable regulatory thresholds, including by providing laboratory reports. That information, however, was not reflected in Clean Harbors' waste profiles for Chiquita's condensate stream (CH2712208², CH2712208EL-1³, and CH2909598⁴). Because Clean Harbors generates manifests from the applicable profile, D004 was likewise not listed on the associated manifests. Chiquita is working with Clean Harbors to correct the hazardous waste manifests for condensate shipments to add D004, consistent with Montrose's waste determination.

With respect to other waste codes, Montrose did not include D035 (MEK) on the Waste Stream Documentation Form because the February 2024 results did not, in Montrose's judgment, support designating the condensate waste stream as hazardous for MEK. Chiquita and Montrose did include D018 (benzene) as a conservative over-characterization. For purposes of this SOV response, and as a further conservative measure, Chiquita is also including D035 on the revised manifests.

In 2024 through January 2025, all hazardous condensate shipped offsite bore the D001 waste code. However, no condensate analytical data from May 2024 to present shows a flash point below 203 °F, let alone 140 °F (the ignitability/D001 threshold). In March 2025, Clean Harbors generated a new profile that removed the D001 waste code, with the intent that it would conservatively ship any future condensate load under the former, D001-bearing profile if a sample of the tank load to be shipped tested ignitable. No D001 waste code was improperly included on or omitted from a hazardous condensate manifest.

Summary of DTSC Prescribed Actions:

DTSC directs Chiquita to, within 30 days of the SOV:

- (i) Determine which hazardous waste manifests for hazardous waste condensate require corrections and submit manifest corrections via US EPA's e-Manifest system for all hazardous waste condensate shipments that contained arsenic and/or pyridine (with documentation of the completed corrections sent to DTSC).
- (ii) Provide an updated waste characterization for hazardous waste condensate.
- (iii) Provide complete analytical laboratory reports for all condensate samples, including but not limited to, samples collected in 2025 from Tanks 68, 69, 190, T1, and T2.

² This profile for disposal at Clean Harbors' Aragonite incineration facility in Utah is based on analytical reports of condensate samples collected on January 19 and 23, 2024. Approximately one week after this profile was signed, Chiquita received—and promptly provided to Clean Harbors—the report for a full TCLP analysis of another January 23 sample, which included detections of arsenic and pyridine above their respective toxicity characteristic thresholds. Clean Harbors did not amend the profile.

³ This profile is substantively the same as CH2712208 but was intended for use at Clean Harbors' El Dorado incineration facility in Arkansas in June 2024 while Aragonite was temporarily full.

⁴ This new profile was created to remove the D001 waste code because no condensate sample taken since May 2024 had tested with a flash point below 140 °F.

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(iv) Provide a map of the condensate tank area including T1/T2 and its associated piping as requested in DTSC's information request on October 13, 2025.

Chiquita Response to DTSC Prescribed Actions:

(i) Chiquita (working with Clean Harbors, which prepares the manifests for condensate shipments) has identified the hazardous waste condensate manifests that require revision. Chiquita understands that Clean Harbors is in the process of updating the manifests and expects to submit the revisions via US EPA's e-Manifest system tomorrow, if at all possible. The revised manifests will align with Montrose's formal waste determination by adding the D004 (arsenic) waste code. As a conservative over-characterization, Chiquita will also include the D035 waste code for MEK on the revised manifests. Based on the data available for the condensate shipments at issue, and for the reasons described above, the revised manifests will not include the D038 waste code. Documentation of completion for these corrections will be provided next week if possible, but no later than in conjunction with our response to Allegation #1 in January.

Chiquita is not altering the manifests with regard to any existing ignitability (D001) waste codes or lack thereof. The manifests for loads of condensate that were transported, treated, and disposed of as ignitable waste under Clean Harbors Profiles CH2712208 and CH2712208EL-1 will continue to bear the D001 waste code, and manifests for loads that were transported, treated, and disposed of as non-ignitable waste under Profile CH2909598 will continue not to bear the D001 waste code.

The revised manifests will include all hazardous condensate manifests generated and submitted from January 1, 2024, to present. Chiquita's condensate waste stream was not hazardous prior to 2024. Chiquita's first shipments of hazardous condensate for off-site treatment and disposal occurred on February 26, 2024 (Manifests 018767996FLE and 018767997FLE).

(ii) Chiquita has performed an updated waste determination for hazardous waste condensate. Specifically, Chiquita (through Montrose) has determined that the condensate is hazardous for arsenic (D004). This updated waste determination is based on eight samples taken at three-day intervals between November 19 and December 10, 2025. Copies of the analytical laboratory reports for these samples are provided in **Attachment 1**. The new Waste Stream Documentation Form is provided in **Attachment 2**. The waste continues to be permissible for combustion under the regulatory exemptions in 40 C.F.R. § 268.3(c)(1) and (6) and 22 CCR § 66268.3(b)(1) and (6), as described above.

(iii) Copies of all complete analytical laboratory reports for all condensate samples taken over the same time period covered by (i) are provided in **Attachment 3**. Chiquita's condensate waste stream was not hazardous prior to 2024.

(iv) A map of the condensate tank area including T1/T2 has previously been provided, a copy of which was attached to our May 1, 2025 response to DTSC's April 1, 2025 Summary of

Chiquita Canyon Landfill Response to November 18, 2025 Summary of Violations

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Violations. Chiquita is working with its consultants to produce an updated map as expeditiously as possible.

Allegation #3

Summary of DTSC Allegation:

DTSC alleges that “on and/or before” August 19, 2025 Chiquita failed to properly label tanks containing hazardous waste leachate, which it alleges violates 22 CCR § 66262.17(a)(5).⁵ DTSC states it observed 20,000-gallon tanks storing hazardous waste leachate and/or condensate that it alleges were not properly labeled with the words “Hazardous Waste,” a description of its contents, and the accumulation start date.

DTSC also alleges that Chiquita provided tank inspection logs from June 2025 to September 2025 that showed containers with alleged “unsatisfactory” labeling.

Chiquita Response to Allegation:

Chiquita denies that it violated 22 CCR § 66262.17(a)(5), as alleged by DTSC, for several reasons. First, that provision does not currently apply to Chiquita (and did not apply during the relevant times cited by DTSC). Compliance with the labeling and marking requirements under the referenced section is a “condition for exemption” from permitting requirements under Section 66262.17. Chiquita is not (and has not been) required to meet the conditions for the Large Quantity Generator (“LQG”) accumulation exemption from permitting set forth at Section 66262.17 because it is already covered by a different permitting exemption, namely the Immediate Response Exemption. Chiquita cannot have “violated” the conditions of an exemption that it did not need.

Second, to the extent that DTSC is alleging that Chiquita failed to properly label certain tanks as Non-Hazardous or Pending Analysis, Chiquita notes that potentially inadequate labeling of tanks not holding hazardous wastes is not a violation of the hazardous waste regulations.

To the extent that labeling and marking requirements apply to Chiquita, any inadequate labeling or marking of tanks holding hazardous waste was a harmless error. It is Chiquita’s policy to treat any waste stream that is characteristically hazardous as hazardous until it is determined to be non-hazardous. This includes waste streams that are pending analysis. This existing approach is already protective against any concerns of inadequate labeling and marking or improper accumulation time and further ensures that all waste streams are managed appropriately. Further, each tank, container, or bin, regardless of their contents, has other indications such as location,

⁵ DTSC also vaguely cites to HSC § 25153.6, which requires a generator of non-RCRA hazardous waste to “comply with any notification requirements for non-RCRA hazardous waste which the department adopts by regulation.” HSC § 25153.6(b). DTSC does not appear to allege any such notification requirements that it believes to have been violated. To the extent there is a suggestion that notification requirements have been violated, Chiquita also denies that allegation.

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knowledge of waste streams flowing into and out of the tanks, logs, standard operating procedures, and other tracked information that ensure that all Chiquita personnel working with or around the tanks, containers, and bins know of their contents and whether they contain hazardous waste. Because of this knowledge and Chiquita's hazardous waste management practices, Chiquita personnel are aware of tank contents, and all waste streams are managed appropriately.

Summary of DTSC Prescribed Actions:

- (i) DTSC directs Chiquita to immediately label all containers and tanks accumulating hazardous waste, and to provide documentation of compliance to DTSC within 30 days of the SOV.
- (ii) DTSC also directs Chiquita to label blue and green containers used to accumulate leachate from drip pans and to accumulate soiled absorbent.

Chiquita Response to DTSC Prescribed Actions:

Although Chiquita believes that it is not currently subject to the cited labeling and marking requirements due to the Immediate Response Exemption, Chiquita is nevertheless in the process of labeling and marking the containers (including bins) and tanks accumulating hazardous waste consistent with 22 CCR § 66262.17(a)(5).⁶ Ordering labels and properly marking numerous containers is a time-consuming process. Chiquita had already begun taking steps to obtain the proper labels for the new Tank Farm 13, but proper labels require planning and cannot be implemented on the aggressive schedule that DTSC has directed. Because DTSC was not willing to grant an extension, Chiquita has implemented a temporary measure to comply with DTSC's directive. Photos of the interim labels are included as **Attachment 4**.

Other DTSC Issues/Concerns

In Section II of the SOV, DTSC lists two additional areas of concern identified during its investigation. Each area is discussed separately below.

Issue/Concern 1

Chiquita Response:

It does not appear that DTSC is alleging a violation with respect to "Issue/Concern 1" at this time, but it states that "[f]urther research may identify additional violations." Chiquita maintains that there has been no violation with respect to this identified "issue/concern." As will be explained in more detail when Chiquita submits its response to Allegation #1, and as previously explained in Chiquita's May 1, 2025 response to DTSC's April 1, 2025 SOV, the occurrence of leachate and/or condensate releases does not constitute a violation of 22 CCR § 66262.251, both

⁶ Chiquita interprets both of DTSC's directives as relating to hazardous waste labeling, given the underlying authority cited.

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because that provision does not currently apply at the facility and because the facility has implemented numerous procedures designed to minimize releases, as would be required under that provision. In addition, Chiquita has been and will continue documenting and reporting to DTSC all releases required to be documented and reported under applicable laws and regulations.

Issue/Concern 2

Chiquita Response:

It does not appear that DTSC is alleging a violation with respect to “Issue/Concern 2” at this time, but it requests additional information about the handling of solids at the facility and states that “[f]urther research may identify additional violations.” As discussed below, Chiquita maintains that its handling of leachate- and/or condensate-contaminated solids (such as soil or rock, absorbent, spent carbon media, and sludge) is consistent with applicable regulatory requirements.

Chiquita does not commingle hazardous and non-hazardous waste streams. Chiquita utilizes separate rolloff bins to ensure that hazardous waste streams are managed separately from non-hazardous waste streams. The designated rolloff bin for hazardous waste streams receives only solids used for cleanup of spills of characteristically hazardous leachate or leachate that is managed as hazardous due to cross contamination or other concerns. Once the designated rolloff bin for hazardous waste streams is full, it is sampled to confirm whether it is hazardous and then disposed accordingly.

Each rolloff bin therefore contains a single waste stream that can and should be characterized as one. Some variability in a single waste stream is to be expected, but determining which rolloff bin a waste should go into based on knowledge is appropriate under these circumstances.

Chiquita is in the process of labeling and marking the designated rolloff bin for hazardous waste streams consistent with 22 CCR § 66262.17(a)(5), as set forth in response to Allegation #3 above. Regardless, each rolloff bin has other indications such as location, logs, standard operating procedures, and other tracked information that ensure that all Chiquita personnel working with or around the rolloff bins know of their contents and whether they contain hazardous waste. This information has also been communicated to all Chiquita personnel working with or around the rolloff bins. Because of this knowledge and Chiquita’s hazardous waste management practices, Chiquita personnel are aware of the contents, and all waste streams are managed appropriately.

As noted above, Chiquita is providing this information in the interest of continued cooperation with its regulators. The information, documents, and attachments provided herein should not be construed as an admission of any factual allegation or legal conclusion in the SOV or an

Chiquita Canyon Landfill Response to November 18, 2025 Summary of Violations

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admission of any liability for any matter described in the SOV. Chiquita remains available to discuss these issues as needed. Please contact me if you have any questions.

Regards,



Kate Logan
Senior Remediation Project Manager
Chiquita Canyon, Landfill

Enclosures

cc: Ken Habaradas, Los Angeles County Department of Public Health
Robert Ragland, Los Angeles County Department of Public Health
Liza Frias, Los Angeles County Department of Public Health
Nichole Quick, M.D., Los Angeles County Department of Public Health
Shikari Nakagawa-Ota, Los Angeles County Department of Public Health
Karen Gork, Los Angeles County LEA
Renee Jensen, LEA Counsel
Blaine McPhillips, Senior Deputy County Counsel
Emiko Thompson, Los Angeles County Public Works
Alex Garcia, Los Angeles County Department of Regional Planning
Ai-Viet Huynh, Los Angeles County Department of Regional Planning
Wes Mindermann, CalRecycle
Todd Thalhamer, CalRecycle
Jeff Lindberg, California Air Recourses Board
Jack Cheng, South Coast Air Quality Management District
Larry Israel, South Coast Air Quality Management District
Enrique Casas, Los Angeles Regional Water Quality Control Board
Thanne Berg, Department of Toxic Substances Control
Dylan Clark, Department of Toxic Substances Control
Pete Ruttan, Department of Toxic Substances Control
Tim Crick, Department of Toxic Substances Control
Diane Barclay, Department of Toxic Substances Control
Christopher Kane, Department of Toxic Substances Control
Johnathan Crook, Department of Toxic Substances Control
Lisa Winebarger, Department of Toxic Substances Control
Bridget Floyd, Department of Toxic Substances Control
Dylan Smith, Chiquita Canyon
Sarah Phillips, Chiquita Canyon
Amanda Froman, Chiquita Canyon

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John Perkey, Chiquita Canyon

Megan Morgan, Beveridge & Diamond, P.C.

Nicole Weinstein, Beveridge & Diamond, P.C.

Manifest Tracking Number	Last Updated Date	Shipped Date	Received Date	Certified Date	Generator ID	Transporter ID	TSDf ID	Status	Action
018767997FLE	12/19/2025 10:36 AM	02/26/2024	02/28/2024	12/19/2025	CAL000347030	OKR000031492	UTD981552177	Corrected	  
018767996FLE	12/19/2025 10:39 AM	02/26/2024	02/28/2024	12/19/2025	CAL000347030	OKR000031492	UTD981552177	Corrected	  
018768000FLE	12/19/2025 10:43 AM	04/05/2024	04/08/2024	12/19/2025	CAL000347030	OKR000031492	UTD981552177	Corrected	  
018768002FLE	12/19/2025 10:46 AM	05/01/2024	05/02/2024	12/19/2025	CAL000347030	OKR000031492	UTD981552177	Corrected	  
018766113FLE	12/19/2025 09:30 AM	07/04/2024	07/08/2024	12/19/2025	CAL000347030	ALR000007237	UTD981552177	Corrected	  
017790898FLE	12/19/2025 10:51 AM	12/27/2024	12/28/2024	12/19/2025	CAR000381574	ALR000007237	UTD981552177	Corrected	  
017791012FLE	12/19/2025 10:54 AM	01/23/2025	01/24/2025	12/19/2025	CAR000381574	CAR000181560	UTD981552177	Corrected	  
017791030FLE	12/19/2025 09:30 AM	01/22/2025	01/27/2025	12/19/2025	CAR000381574	ALR000007237	UTD981552177	Corrected	  
017791031FLE	12/19/2025 10:57 AM	01/24/2025	01/27/2025	12/19/2025	CAR000381574	CAR000181560	UTD981552177	Corrected	  
017791034FLE	12/19/2025 11:00 AM	01/30/2025	01/31/2025	12/19/2025	CAR000381574	ALR000007237	UTD981552177	Corrected	  
017791033FLE	12/19/2025 11:03 AM	01/31/2025	01/31/2025	12/19/2025	CAR000381574	ALR000007237	UTD981552177	Corrected	  
017791057FLE	12/19/2025 11:06 AM	01/31/2025	02/03/2025	12/19/2025	CAR000381574	ALR000007237	UTD981552177	Corrected	  
018768001FLE	12/19/2025 11:08 AM	04/08/2024	04/10/2024	12/19/2025	CAL000347030	OKR000031492	UTD981552177	Corrected	  
020750335FLE	12/19/2025 11:11 AM	05/09/2025	05/09/2025	12/19/2025	CAR000381574	MAD039322250	UTD981552177	Corrected	  
020750336FLE	12/19/2025 11:13 AM	05/09/2025	05/12/2025	12/19/2025	CAR000381574	MAD039322250	UTD981552177	Corrected	  
020750338FLE	12/19/2025 11:15 AM	05/10/2025	05/12/2025	12/19/2025	CAR000381574	ALR000007237	UTD981552177	Corrected	  
018766112FLE	12/19/2025 11:17 AM	07/05/2024	07/05/2024	12/19/2025	CAL000347030	ALR000007237	UTD981552177	Corrected	  

Manifest Tracking Number	Last Updated Date	Shipped Date	Received Date	Certified Date	Generator ID	Transporter ID	TSDf ID	Status	Action
020750678FLE	12/19/2025 11:22 AM	07/22/2025	07/24/2025	12/19/2025	CAR000381574	MAD039322250	UTD981552177	Corrected	  
020750679FLE	12/19/2025 11:24 AM	07/22/2025	07/23/2025	12/19/2025	CAR000381574	ALR000007237	UTD981552177	Corrected	  
020750875FLE	12/19/2025 11:26 AM	08/07/2025	08/11/2025	12/19/2025	CAR000381574	MAD039322250	UTD981552177	Corrected	  
020750886FLE	12/19/2025 11:28 AM	09/30/2025	10/01/2025	12/19/2025	CAR000381574	ALR000007237	UTD981552177	Corrected	  

Manifest Search Results

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Manifest Tracking Number <div>⇅</div>	Last Updated Date <div>⇅</div>	Shipped Date <div>⇅</div>	Received Date <div>⇅</div>	Certified Date <div>⇅</div>	Generator ID <div>⇅</div>	Transporter ID	TSDF ID <div>⇅</div>	Status <div>⇅</div>	Action
019986291FLE	01/05/2026 02:39 PM	06/13/2024	06/17/2024	01/05/2026	CAL000347030	ALR000007237	NED981723513	Corrected	  

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Export as CSV

General Information

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Manifest Tracking Number	Manifest Type	Origin Type	Version
019986292FLE	Paper + Data	Service	Version 2
Status Corrected - Corrected and signed <div>Make Correction</div>		Potential Ship Date	
Does this manifest contain residues or rejected waste? No			
Shipment Type Domestic			

1-5. Generator Information

EPA ID Number	Name	Mailing Address	Site Address
CAL000347030	Wc 4050 - Chiquita Canyon Landfill	29201 Henry Mayo Dr, Castaic, CA 91384 UNITED STATES	29201 Henry Mayo Dr, Castaic, CA 91384 UNITED STATES
Emergency Response Phone	Extension	Contact Phone	Extension
800-483-3718		661-371-9214	
Contact Email	steven.cassulo@wasteconnections.com		
		Can e-Sign?	Can Quick Sign?
		Yes	Yes
		Has a Registered e-Manifest User?	Yes

SOP (Leachate Tanker Loading by Electric Pump at Tank Farms)

Prepared for: Chiquita Canyon Landfill (CCL)

Rev 0 01/09/2026



TASK	Leachate transfer operations using electric pump into tankers in tank farm facility.					
POTENTIAL HAZARDS	Slips/Trips/Falls	<input checked="" type="checkbox"/>	Heat / Cold	<input checked="" type="checkbox"/>	Splash/ Fumes	<input checked="" type="checkbox"/>
	Cuts / Laceration	<input type="checkbox"/>	Dust	<input checked="" type="checkbox"/>	Biological	<input checked="" type="checkbox"/>
	Pinch / Crush	<input type="checkbox"/>	Noise / Vibration	<input checked="" type="checkbox"/>	Haz Waste	<input checked="" type="checkbox"/>
	High Pressure	<input checked="" type="checkbox"/>	Fire	<input checked="" type="checkbox"/>	Exhaust	<input checked="" type="checkbox"/>
PPE REQUIRED	<ul style="list-style-type: none">• Hard Hat• Blackline 5 Gas Meter• Safety Toe Shoes• FR Clothing (High Viz)• Respirator (if applicable)• Chemical Gloves• Safety Glasses					

1. Purpose

To outline the safe and efficient procedure for loading leachate into a tanker truck using an electric pump system within a tank farm while ensuring compliance and worker safety. The goal of this SOP is to prevent leachate overflow, leaks, spillage, equipment failure/malfunction, operator and/or other human error, exposure of leachate and leachate vapors into the atmosphere in and around the tank farm areas, as well as to provide information on proper maintenance and troubleshooting of the tank farm area.

2. Scope

Applicable to all personnel involved in leachate transfer operations using a stainless steel electric pump into tankers at the tank farm facility.

3. Responsibilities

- **Tank Farm Technician** – Wears appropriate PPE and monitors the pump process. Inspects and maintains equipment before use.
- **Tank Farm Gatekeepers** – Manage, monitor, and document all tanker truck operations within the tank farm.
- **Tank Farm Supervisors** – Ensure compliance with safety and environmental regulations.
- **Tanker Driver** – Assists with hose connection and ensures vehicle readiness.

4. Safety Precautions

- **Never** operate pump dry.
- **Never** bypass safety devices.
- **Never** leave the loading area unattended during loading.
- **Always** wear appropriate PPE when needed.
- **Always** maintain communication between tank farm tech and driver.

SOP (Leachate Tanker Loading by Electric Pump at Tank Farms)

Prepared for: Chiquita Canyon Landfill (CCL)

Rev 0 01/09/2026



- Avoid direct contact with leachate.
- Report any equipment failure, malfunction, or maintenance requirement immediately to the supervisor on duty.
- In case of a spill or other release, activate spill response procedures.

5. Equipment Details & Materials

- Stainless steel pump system
- Suction hoses and couplings
- Mag meter
- Drip pans, containing absorbent
- Buckets
- Hoses and fittings rated for leachate transfer
- Valve tags
- Secondary containment (if required)
- Spill kit (absorbents, containment booms, pads)
- Emergency eyewash and safety shower stations nearby

6. Pre-Operation of Electric Pump Inspection

1. Visual Inspection:

- The tank farm tech shall:
 - Check for visible damage, leaks, or loose fittings; and
 - Inspect suction and discharge hoses/connections.

2. Electrical Check:

- The tank farm tech shall inspect power cord and plug for damage.

3. Fluid Check:

- The tank farm tech shall ensure the pump casing is filled with liquid to aid in priming.
- Do not run the pump dry.

7. Start-Up Procedure of Electric Pump

1. Prime the pump:

- Fill pump casing with liquid through the fill port if not already primed.
- Check that the suction line is submerged and free of air leaks.

2. Power On:

- Turn on the disconnect switch or breaker.
- Start the pump using the control panel or motor starter.

3. Monitor Startup:

- Ensure suction is drawing and discharge flow is smooth.
- Watch (meter) for proper reading.
- Listen for unusual sounds (cavitation, vibration, knocking, etc.).

4. Check Flow:

SOP (Leachate Tanker Loading by Electric Pump at Tank Farms)

Prepared for: Chiquita Canyon Landfill (CCL)

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- Confirm that flow rate meets operational requirements (200-300 GPM target).

8. Pre-Loading Checks

8.1 Inspection of Equipment

- Inspect the **tanker, electric pump, and hoses** for leaks, wear, or damage.
- Ensure all valves and connections are in **good, working condition**.
- Verify that the **electric pump system** is functioning properly.

8.2 Site Preparation

- All tanker trucks will enter tank farm area guided by Tank Farm staff and be assigned designated loading area. Tank farm tech will walk the line and verify which tank volume the truck is authorized to be loaded with.
- In consultation with the truck driver, an expected volume will be calculated based on the truck's empty "scale in" weight and max weight rating once filled (the difference is therefore the amount of liquid that can be loaded onboard).
- Confirm driver is wearing the required PPE.
- Tank farm techs will place drip pans under all potential spill points.
- Driver will apply wheel chocks to the driver's side.

9. Loading Procedure

9.1 Connecting the System

- Ensure tanker truck is properly grounded.
- Tank farm tech will hand over hose to driver.
- Tank farm tech will verify **hose clamps and fittings** are tight.
- Tank farm tech will verify the hose is empty of liquid and bleed the hose to relieve pressure.
- Driver will connect hose to his tanker and tank farm tech will verify it is properly connected.
- Gatekeeper will verify the designated leachate tank loading port is connected.

9.2 Electric Pump Loading Process

- Ensure correct pulling valves are open and treatment manifold ball valve is locked and closed.
- Ensure the mag meter is zeroed out.
- Driver will uncap all exhaust points and scrubber.
- If applicable, driver will open internal/external valves & inlet valve.
- Driver opens valve on truck.
- Tank farm tech opens valve to approved/verified tank.
- The tank farm tech shall monitor the **flow rate and pressure** to prevent overloading.
- Maintain **constant communication** with driver/personnel during loading to ensure that the driver and personnel are aware of changes in equipment and liquid transfer status.

SOP (Leachate Tanker Loading by Electric Pump at Tank Farms)

Prepared for: Chiquita Canyon Landfill (CCL)

Rev 0 01/09/2026



If pump loses prime due to tank being emptied refer to Section 7.1 Start-Up Procedure

9.3 Completion of Loading

- Once calculated gallons are achieved, the driver will signal cut off and maintain valve open while tank farm tech pushes compressed air between ball valve housing and tanker.
- Driver will then close trailer inlet valve and tech will release pressure from the housing between ball valve and tanker with bleeder.
- Tank farm tech will disconnect the hose from the tanker carefully to prevent spills.
- Cap is applied to the tanker and to the hose by the driver.
- All valves are tagged on tanker by the driver, see Truck Valve Tagging SOP for additional details.
- Top hatch of tanker is verified sealed by the driver.
- The scrubbers are verified empty by the driver.
- The truck is released once all documentation is verified by Gatekeeper.

9.4 Overfilled Truck

- When loading trailers with PTO and the truck is overweight, excessive liquid needs to be pushed back with PTO pressure.
- Determine how much liquid is needed to pull out to determine how much liquid needs to be pushed back based on the total weight and PSI of the truck.
- Check the level on the tank will be pushing back into.
- If hose is hooked up to pump, the check valve will not allow liquid to push back. (hoses would need to be reversed).
- If pushing back directly into manifold, hook the truck/trailer back to manifold.
- Once hooked up, both tank and manifold valves can be opened.
- Driver can relieve all vacuum and air from trailer.
- Driver will adjust lever over to pressure (before driver engages PTO, driver should open trailer valve.)
- Once liquid has been pushed back, driver will need to relieve all pressure from trailer for vacuum to engage.

***Sometimes pressure is not needed. If tank is empty or low within the same bank, identify potential gravity feedback to tank.**

- Open tank valve, manifold valve, and trailer valve and confirm liquid is flowing back into tank.

10. Post-Loading Actions

- Turn off motor at control panel.
- Inspect for physical damage to hoses, pipes, and tanks such as cracks, any exposures of reinforcements, damaged gaskets, and corroded or cracked fittings.
- Clean up any **minor spills** using the spill kit.
- During and after leachate transfer, visually inspect the tank and area to ensure no spills occurred. If a spill is identified, it must be reported immediately.

SOP (Leachate Tanker Loading by Electric Pump at Tank Farms)

Prepared for: Chiquita Canyon Landfill (CCL)

Rev 0 01/09/2026



11. Spill & Emergency Response

- In case of a minor spill:
 - Ensure the source of the spill has ceased.
 - Use **spill absorbents** to contain and clean up.
 - Dispose of contaminated materials properly.
- In case of a major spill:
 - **Stop operations immediately** and notify the supervisor.
 - Ensure the source of the spill has ceased.
 - **Activate the spill response plan.**
 - Evacuate the area, if necessary.
- In case of a fire:
 - Stop operations immediately and notify the supervisor.
 - If the fire can be contained, use one of the fire extinguishers available throughout the tank farm.
 - Evacuate the area and call emergency services, if necessary.
- In case of exhaust:
 - Keep clear proximity of exhaust ventilation actively loading.
- In case of pressure:
 - Relieve pressure by opening bleeder valve.
 - Follow spill precautions detailed above, if necessary.

12. Pump Emergency Procedure

In case of pump failure, fluid leak, or electrical fault:

- Shut down the pump immediately.
- Notify supervisor.
- Supervisor will notify Barney's Electrical to isolate power at the breaker.
- Activate the spill response plan, if necessary.
- Evacuate the area, if necessary.

13. Troubleshooting Guide

Symptom	Possible Cause	Solution
No suction	Pump not primed	Fill casing with fluid
Low flow rate	Clogged suction/discharge line	Clean lines
Excessive vibration	Worn impeller or bearing	Inspect/replace components
Overheating motor (Barney's Electrical will be notified)	Voltage mismatch, overload	Verify voltage, check amperage
Leaks	Damaged seals or fittings	Replace seals, tighten fittings

SOP (Leachate Tanker Loading by Electric Pump at Tank Farms)

Prepared for: Chiquita Canyon Landfill (CCL)

Rev 0 01/09/2026



14. Documentation & Reporting

- Record all **loading activities, inspections, and any incidents.**
- Report any **equipment malfunctions** or environmental concerns to management.
- Record spills, leaks, and releases pursuant to the spill response plan.

Additional References

- CCL must also comply with the applicable leachate tank operations requirements in CCL's *Leachate Unit Management Plan*, *ETLF Operation HASP*, *Leachate Management Plan*, *Spill Response Plan*, and *Data Management Plan*. This SOP may be modified by one or more of these plans.

SOP (Leachate Tanker Loading by Trailer Pump)

Prepared for: Chiquita Canyon Landfill (CCL)

Rev 5 1/09/2026



TASK	Leachate transfer operations using trailer pump.					
POTENTIAL HAZARDS	Slips/Trips/Falls	<input checked="" type="checkbox"/>	Heat / Cold	<input checked="" type="checkbox"/>	Splash/ Fumes	<input checked="" type="checkbox"/>
	Cuts / Laceration	<input checked="" type="checkbox"/>	Dust	<input checked="" type="checkbox"/>	Biological	<input checked="" type="checkbox"/>
	Pinch / Crush	<input checked="" type="checkbox"/>	Noise / Vibration	<input checked="" type="checkbox"/>	Haz Waste	<input checked="" type="checkbox"/>
	High Pressure	<input checked="" type="checkbox"/>	Fire	<input checked="" type="checkbox"/>	Exhaust	<input checked="" type="checkbox"/>
PPE REQUIRED	<ul style="list-style-type: none">• Hard Hat• Safety Toe Shoes• 5 Gas Meter• FR Clothing (High Viz)• Respirator (if applicable)• Chemical Gloves• Safety Glasses					

1. Purpose

To provide a standardized, safe, and efficient procedure for transferring leachate to a tanker truck using a pump-based system equipped with vacuum. The goal of this SOP is to prevent leachate overflow, leaks, spillage, equipment failure/malfunction, operator and/or other human error, exposure of leachate and leachate vapors into the atmosphere in and around the tank farm areas, as well as to provide information on proper maintenance and troubleshooting.

2. Scope

This SOP applies to all operators involved in leachate tanker filling operations using the trailer vacuum pump system in a tank farm transfer station.

3. Responsibilities

- **Tank Farm Technician-** Must follow this SOP, wear appropriate PPE, and monitor the process. Inspect and maintain equipment before use.
- **Tank Farm Supervisors-** Ensure compliance with safety and environmental regulations.
- **Tank Farm Gatekeepers-** Manage, monitor, and document all tanker truck operations within the tank farm.
- **Tanker Driver** – Assists with hose connection and ensures vehicle readiness.

4. Safety Precautions

- **Never** leave the vacuum system unattended during loading.
- **Never** bypass safety devices.
- **Never** leave the loading area unattended during loading.
- **Always** wear appropriate PPE when needed.
- **Always** maintain communication between tank farm tech and driver.
- Avoid direct contact with leachate.

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- Report any equipment failure, malfunction, or maintenance requirement to the supervisor on duty immediately.
- In case of a spill or other release, activate spill response procedures.

5. Equipment & Materials

- Transfer Pump (Diesel-Powered)
- Suction hoses and couplings
- Flow meter
- Drip pans and absorbents
- Buckets
- Hoses and fittings rated for leachate transfer
- Secondary containment (if required)
- Spill kit (absorbents, containment booms, pads)
- Emergency eyewash and safety shower stations nearby
- Valve Tags

6. Procedure

6.1 Pre-Filling Checks

- Inspect all hoses, couplings, and the pump for leaks, damage, or wear.
- Ensure all valves and connections are in good, working condition.
- Ensure pump has sufficient fuel (diesel).
- All tanker trucks will enter tank farm area guided by Tank Farm staff and be assigned designated loading area. Tank farm tech will walk the line and verify which tank volume the truck is authorized to be loaded with.
- In consultation with the truck driver, an expected volume will be calculated based on the truck's empty "scale in" weight and max weight rating once filled (the difference is therefore the amount of liquid that can be loaded onboard).
- Confirm driver is wearing all proper PPE.
- Tank farm techs will place drip pans and buckets under all potential spill points. Driver will apply wheel chocks to the driver's side.

6.2 Hose Setup

- Tank farm tech will verify the hose is empty of liquid and bleed the hose to relieve pressure.
- The driver will properly connect and secure hose to his tanker from the designated loading area.
- Gatekeeper verifies the correct tank is being pulled from.
- Ensure correct pulling valves is open and treatment manifold ball valve is locked and closed.
- Ensure flowmeter is zeroed out and or level stick is provided.
- Ensure additional manifold poly valves are in the closed position before opening the correct poly valves and tank.
- Tank farm tech will open the approved/verified tank outlet valve and the manifold poly valves.
- Connect discharge hose from the pump's outlet to the tanker's intake valve.

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- Secure all connections using proper clamps or camlocks.
- Driver opens valve on truck.
- Tech will open ball valve at the designated loading area.
- If applicable, bond/ground hoses to avoid static discharge.

6.3 Pump Operations and Filling

- Driver's pump must be in neutral, open exhaust valve and tech to verify and confirm exhaust has been uncapped and open position to allow trailer to breath.
- Tank Farm tech will start/prime pump, increase RPMs to 1,400
- Transfer process begins from pump to tanker to calculated volume.
- Monitor the flow and listen for unusual sounds or leaks.
- Stay near the pump and truck throughout the operation.
- Monitor fill level using mag meter, sight gauge, level stick.
- As tanker approaches the calculated volume pump is idled down to 900 RPMs.
- Once total gallons are achieved, driver will signal tech to cut off flow and close load out ball valve.

6.4 Completion and Shutdown

- Once calculated gallons are achieved, the trailer pump is shut off and load out ball valve at the designated load out area is closed.
- Tank farm tech will turn on compressor and apply air to clear the hose from the pump to tanker.
- Once hose is clear, driver is to close truck valve, and tech will also stop supplying air and close tank valve.
- Tech will then shut off Compressor and bleed off remaining air left in air hose; tech will then bleed air from loading hose passed the check valve and verify and confirm hose is empty and pressure has been relieved.
- Tank farm tech will disconnect the hose from the tanker carefully to prevent spills.
- Cap is applied to the tanker and to the hose by the driver.
- All tanker valves are tagged by the driver (please refer to Valve Tagging SOP).
- Top hatch of tanker is verified closed by the driver.
- The scrubbers are verified empty by the driver and walk around must be conducted with Gatekeeper as per Truck Valve Tagging SOP.
- Truck is released once all paperwork is verified by Tank Farm Gatekeeper.
- Tank farm tech will close manifold poly valves and tank outlet valve.

6.5 Overfilled Trucks

- When loading with pump and truck is overweight, liquid needs to be pushed back into tank that was pulled from.
- Reverse hoses on pump inlets.
- Hook up trailer to pump & manifold.
- Calculate how much weight is needed to pull off trailer.
- Before turning on pump, tank valve and manifold valves should be in the open position.
- Once pump is turned **ON** to push back at **900 RPM**, driver can open valve.
- Once push back time has been achieved, Tank Farm Tech will turn off pump and close all valves.

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- Confirm air hose is connected to **outlet bleeder**; driver will open valve to push residual liquid still in the hose into trailer.
- Once hose is clear, driver will close valve.
- Tank Farm Tech will bleed pressure from hose before disconnecting.
- Valve will be capped and tagged.
- Always conduct a final walk through around the entire truck to ensure everything is good for any issues that might arise.

Transfer Truck or Next Truck in line going to same facility to pull liquid off a truck:

- Tank Farm staff must guide all trucks to staging area.
- Set up trays under potential spill points.
- Hook up hose to overloaded truck.
- Stage transfer truck next to overloaded truck and hook up other end of hose to transfer truck.
- Have transfer truck build vacuum (**10 in vacuum**).
- Overloaded trailer exhaust valve needs to be open
- Calculate how much weight to pull off (every min. will take off (**2,000-2500 Lbs.**))
- Once transfer truck has enough vacuum, overloaded truck and transfer truck will open valves at the same time and the timer starts.
- Once time has been achieved, driver in over-filled truck will close truck valve and open truck bleeder to empty liquid in hose.
- Both ends can now be disconnected, final walk around can be conducted, and truck can be tagged out.

7. Post- Operations

- Inspect for physical damage to hoses, pipes, and tanks such as cracks, any exposures of reinforcements, damaged gaskets, and corroded or cracked fittings.
- Clean up any **minor spills** using the spill kit.
- During and after leachate transfer, visually inspect the tank and area to ensure no spills occurred.

If a spill is identified, it must be reported immediately to CCL staff.

8. Spill & Emergency Response

- In case of a minor spill:
 - Ensure the source of the spill has ceased.
 - Use **spill absorbents** to contain and clean up.
 - Dispose of contaminated materials properly.
- In case of a major spill:
 - **Stop operations immediately** and notify the supervisor.
 - Ensure the source of the spill has ceased.
 - **Activate the spill response plan.**
 - Evacuate the area if necessary.
- In case of a fire:
 - Stop operations immediately and notify the supervisor.

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- If the fire can be contained, use one of the fire extinguishers available throughout the tank farm.
- Evacuate the area and call emergency services, if necessary.
- In case of exhaust:
 - Keep clear proximity of exhaust ventilation actively loading.
- In case of pressure:
 - Relieve pressure by opening bleeder valve.
- Follow spill precautions detailed above, if necessary.

9. Documentation & Reporting

- Record all **loading activities, inspections, and any incidents.**
- Report any **equipment malfunctions** or environmental concerns to management.
- Record spills, leaks, and releases pursuant to the spill response plan.

Additional References

- CCL must also comply with the applicable leachate tank operations requirements in CCL's *Leachate Unit Management Plan*, *ETLF Operation HASP*, *Leachate Management Plan*, and *Data Management Plan*. This SOP may be modified by one or more of these plans.

SOP (Truck Valve Tagging)

Prepared for: Chiquita Canyon Landfill (CCL)

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TASK	Ensure all trucks valves are properly tagged and securely closed to complete the loading process, preventing leaks, spills, and contamination.					
POTENTIAL HAZARDS	Slips/Trips/Falls	<input checked="" type="checkbox"/>	Heat / Cold	<input checked="" type="checkbox"/>	Splash/ Fumes	<input type="checkbox"/>
	Cuts / Laceration	<input type="checkbox"/>	Dust	<input checked="" type="checkbox"/>	Biological	<input checked="" type="checkbox"/>
	Pinch / Crush	<input type="checkbox"/>	Noise / Vibration	<input checked="" type="checkbox"/>	Haz Waste	<input checked="" type="checkbox"/>
	High Pressure	<input checked="" type="checkbox"/>	Fire	<input checked="" type="checkbox"/>	Exhaust	<input checked="" type="checkbox"/>
PPE REQUIRED	<ul style="list-style-type: none">• Hard Hat• Safety Toe Shoes• FR Clothing (High Viz)• Safety Glasses• Chemical Gloves					

1. Purpose

To outline that all truck valves are properly tagged and securely closed to complete the loading process, preventing leaks, spills, and contamination.

2. Scope

This procedure applies to all transport trucks involved in loading operations, bulk liquid, and hazardous material.

3. Responsibilities

- **Tank Farm Technician**- must follow this SOP, wear appropriate PPE, and monitor the process. Inspect and maintain equipment before use.
- **Gatekeeper**- must follow this SOP, wear appropriate PPE, conduct walkthrough and maintain manifest documentation.
- **Truck Driver**- Confirms tags are in place before departure.
- **Tank Farm Supervisors**- ensure compliance with safety and environmental regulations.

4. Equipment & Materials

- Tug Tight Locking Tags (Red)

5. Tagging Procedure

5.1 Prep-Valve Tagging

- If top hatch has been opened during the filling process, confirm the driver has tightened all wing nuts on the hatches.

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6. Initiation of Walkthrough

- **Responsible Party:** CCL Gatekeeper
 - **Action:** The Gatekeeper will initiate a walkthrough with the driver and Tank Farm Technician after filling a truck with the approved liquids.

7. Tagging Process

- **Responsible Party:** Tank Farm Technician
 - **Action:** The tank farm technician will provide locking tags to the driver as each closed valved is identified, indicating that it is properly shut.



8. Valve Locking

- **Responsible Party:** Truck Driver
 - **Action:** The driver will **Lock** and **Tag** all drain and release valves to indicate they been properly closed and secured.

9. Documentation & Reporting

- **Responsible Party:** Gatekeeper
 - **Action:** The Gatekeeper will document “**all valves tagged**” on the manifest.

10. Approval for Departure

- **Responsible Party:** Gatekeeper
 - **Action:** The manifest will indicate that “**all valves tagged**” and given to the driver who is then approved to depart from the tank farm.

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NOTES

- Ensure that all tags are visible and securely attached.
- Follow all safety protocols during the tagging process to prevent any accidents.

Example of Locking Tag

