



CHIQUITA CANYON
A Waste Connections Company

March 8, 2024

Via E-Mail

Ms. Erin Neal
Environmental Scientist
Office of Criminal Investigations
Department of Toxic Substances Control
California Environmental Protection Agency
Erin.Neal@dtsc.ca.gov

**Re: Chiquita Canyon Landfill Response to Request for Information: 2-27-2024
Site Visit Follow-Up**

Dear Ms. Neal:

On March 5, 2024, Chiquita Canyon, LLC (“Chiquita”) received a request for information subsequent to the Department of Toxic Substances Control’s (“DTSC”) February 27, 2024, visit to the Chiquita Canyon Landfill. DTSC’s March 5 correspondence included 10 requests for information, each with multiple subparts, and provided two deadlines: March 12 and March 19. Chiquita can provide some of the information requested by March 12. However, for other requests, Chiquita seeks additional time to address overlapping information requests from DTSC and the U.S. Environmental Protection Agency (“US EPA”).

First, DTSC requested information including off-site shipment records by March 19. Chiquita will be able to provide this information by March 12. Chiquita will also be able to provide post-treatment sampling records and information related to the 2/23/2024 incident by March 12.

Other information requested by March 12, including waste determination documentation and documents related to the hazardous waste tank system and leachate treatment system overlap with other requests by regulators. Chiquita requests additional time to provide this information.

The request for waste determination documentation overlaps with information required by the February 15, 2024, Summary of Violations (“SOV”) issued by DTSC to the Landfill. The SOV requires, among other things, that Chiquita provide DTSC with a written plan for making a proper waste determination by March 15. Chiquita proposes to submit the waste determination documentation on March 19, allowing time to first finalize its waste determination plan.

Similarly, the requests for documents related to the hazardous waste tank system and leachate treatment system overlap with the February 21, 2024, US EPA Unilateral Administrative Order (“UAO”). Specifically, the requests overlap with the UAO’s requirement to prepare a leachate management plan within 30 days of the Effective Date (by March 27). Chiquita proposes to submit the hazardous waste tank system and leachate treatment system documents on March 29, allowing time to first finalize Chiquita’s overall leachate management plan before providing this specific information.

Given the time needed to acquire the requested information, and various associated timetables proposed by DTSC and US EPA, Chiquita proposes the following timetable to respond to DTSC’s March 5 requests:

March 12, 2024

- Post-treatment sampling records
- Documents related to the 2/23/24 incident
- Off-site shipment records

March 19, 2024

- Waste determination documentation for waste leachate and waste condensate
- Waste determination documentation for spent carbon generated from hydrogen sulfide removal vessels
- Employee training records
- Contingency plan records
- Specification sheets for the hoses used in the leachate treatment process and leachate storage tanks

March 29, 2024

- Documents related to the hazardous waste tank system(s) storing hazardous waste leachate
- Documents related to the leachate treatment system

Please let us know if you have any questions or would like to discuss.

Regards,



Steve Cassulo
District Manager
Chiquita Canyon, LLC

Ms. Erin Neal
March 8, 2024
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cc: Zanalee Zmily, Department of Toxic Substances Control
William Heung, Department of Toxic Substances Control