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10 *Attorneys for Petitioner*  
11 *Chiquita Canyon, LLC*

12 **BEFORE THE STATE WATER RESOURCES CONTROL BOARD**

13 In The Matter Of:

14  
15 CHIQUITA CANYON, LLC

16  
17 FOR REVIEW OF LOS ANGELES  
18 REGIONAL WATER QUALITY CONTROL  
19 BOARD INVESTIGATIVE ORDER NO. R4-  
2024-0010-A01

**PETITION FOR REVIEW AND  
REQUEST FOR STAY OF ORDER AND  
HEARING**

21 PETITION FOR REVIEW AND REQUEST FOR STAY

22 Chiquita Canyon, LLC (hereinafter “Chiquita” or “Petitioner”)<sup>1</sup> respectfully petitions the State  
23

24 <sup>1</sup> The Amended Order is directed to both Waste Connections, Inc. and Chiquita Canyon, LLC. However, Waste  
25 Connections, Inc. (“WCI”) is not a proper party to either the Amended Order or the original Investigative Order, as it is  
26 not the owner or operator of the Landfill. Pursuant to Water Code section 13267, subdivision (b)(1), investigative orders  
27 may in relevant part be issued to “any person who has discharged, discharges, or is suspected of having discharged or  
28 discharging” waste that could affect state waters. Similarly, Water Code section 13383, subdivision (a) permits the  
Regional Board to establish monitoring requirements “for any person who discharges ... to navigable waters....” WCI  
responds to the Amended Order in its individual capacity for the purpose of contesting jurisdiction only. Because it  
does not own or operation the Landfill, WCI is not a “person who has discharged,” etc., and the Regional Board does  
not allege otherwise. The Regional Board has not sufficiently alleged any basis for including this separate corporate  
entity as a respondent in the original or Amended Order. Accordingly, WCI objects to being named as a respondent in  
the Amended Order.

1 Water Resources Control Board (“State Board”) for review of the Investigative Order No. R4-2024-  
2 0010-A01 (as amended on February 11, 2026) (the “Amended Order”) issued by the Los Angeles  
3 Regional Water Quality Control Board (“Regional Board”).<sup>2</sup> (See Wat. Code, § 13320; Cal. Code  
4 Regs., tit. 23, §§ 2050 *et seq.*) As set forth in the Statement of Points and Authorities herein, the  
5 Amended Order is inappropriate and improper by imposing unreasonable and overly burdensome  
6 obligations that are technically infeasible, vague and ambiguous, require compliance methods that  
7 are unduly burdensome and bear no reasonable relationship to compliance standards pursuant to the  
8 California Water Code. As a result, the State Board should order the Regional Board to withdraw  
9 the Amended Order, or in the alternative revise it to require technically attainable and reasonable  
10 compliance standards that are consistent with the California Water Code and rationally aimed at an  
11 established regulatory goal.

12 Further, Chiquita requests an immediate retroactive stay of the Amended Order. (Wat. Code, §  
13 13321; Cal. Code Regs., tit. 23, § 2053.) As set forth in the Statement of Points and Authorities  
14 herein, without a stay Chiquita will be substantially harmed by the unreasonable and costly  
15 requirements contained in the Amended Order. No harm to the public interest or human health and  
16 the environment would result from issuance of a stay. As a result, the State Board should stay the  
17 effects of the Amended Order effective retroactive to the date the Amended Order was issued on  
18 February 11, 2026.

19 Chiquita requests a hearing on both this Petition as well as the request for a stay so that the State  
20 Board may hear oral argument and receive evidence on the matters addressed in this Petition.

21 **1. NAME AND ADDRESS OF THE PETITIONER:**

22 Petitioner Chiquita owns and operates the Chiquita Canyon Landfill, which is located at 29201  
23 Henry Mayo Drive, Castaic, California.

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27 \_\_\_\_\_  
28 <sup>2</sup> Investigative Order No. R4-2024-0010 was originally issued on March 20, 2024. The Regional Board issued an  
Amended Investigative Order on February 11, 2026. The Amended Order mistakenly states that the original order was  
issued on April 22, 2024. (*See* Amended Order, ¶ 24.)

1       **2. THE SPECIFIC ACTION OR INACTION OF THE REGIONAL BOARD WHICH**  
2       **THE STATE BOARD IS REQUIRED TO REVIEW AND A COPY OF ANY ORDER**  
3       **OR RESOLUTION OF THE REGIONAL BOARD WHICH IS REFERRED TO IN**  
4       **THE PETITION:**

5       Petitioner seeks the State Board’s review of the Amended Order. A copy is attached hereto as  
6 Exhibit 2.

7       **3. THE DATE ON WHICH THE REGIONAL BOARD ACTED OR REFUSED TO**  
8       **ACT OR ON WHICH THE REGIONAL BOARD WAS REQUESTED TO ACT:**

9       Investigative Order No. R4-2024-0010 was originally issued on March 20, 2024. This Petition  
10 seeks review of an amendment to that order, which the Regional Board issued on February 11,  
11 2026.

12       **4. A FULL AND COMPLETE STATEMENT OF REASONS THE ACTION OR**  
13       **FAILURE TO ACT WAS INAPPROPRIATE OR IMPROPER:**

14       As discussed in more detail in the Statement of Points and Authorities herein, the Regional  
15 Board’s issuance of the Amended Order was inappropriate and improper for the following reasons:

- 16       a) The Amended Order imposes unreasonable and overly burdensome monitoring  
17       obligations on Chiquita related to laboratory Reporting Limits (“RLs”) for surface water,  
18       stormwater, and groundwater which are not technically attainable by commercial  
19       laboratories identified by Chiquita.
- 20       b) The Amended Order further imposes costly and overly burdensome monitoring, sample  
21       volume, and sample re-run obligations which bear no reasonable relationship to  
22       compliance standards under the California Water Code and therefore are not “reasonably  
23       required” in violation of Water Code section 13383, subdivision (b). This includes  
24       unfounded limitations on sample dilution protocols that are industry standard and  
25       laboratory-approved at commercial laboratories.
- 26       c) The Regional Board likewise failed to provide Chiquita with any written explanation or  
27       evidence in support of the need to comply with these unreasonable and overly  
28       burdensome monitoring, sample volume, and sample re-run requirements. Thus, these

1 requirements in the Amended Order further violate Water Code section 13267.

- 2 d) The Amended Order imposes sampling and analysis requirements regarding the East  
3 Basin which are unreasonable and inconsistent with established sampling and reporting  
4 parameters for landfills which go far beyond relevant requirements under State  
5 stormwater compliance standards.
- 6 e) The Amended Order imposes unsafe sampling conditions for all discharges into and out  
7 of the South and East Basin which are unreasonable and inconsistent with established  
8 sampling protocols required by the State's Industrial General Permit.
- 9 f) Lastly, the Amended Order is vague and ambiguous, including a failure to identify clear  
10 and feasible deadlines for compliance resulting in conflicting timelines applicable to  
11 more than one requirement, imposing unreasonable and inconsistent compliance  
12 expectations on Chiquita.

13 **5. THE MANNER IN WHICH THE PETITIONER IS AGGRIEVED:**

14 The Amended Order subjects Chiquita to regulatory requirements that are unreasonable, unduly  
15 burdensome, costly, and, in some cases, technically unattainable by commercial laboratories and  
16 related industry standards identified by Chiquita.

17 **6. THE SPECIFIC ACTION REQUESTED BY THE PETITIONER:**

18 Chiquita respectfully requests that the State Board order the Regional Board to withdraw the  
19 Amended Order in full as improper under California Water Code section 13320, subdivision (c). In  
20 the alternative, Chiquita requests that the State Board require the Regional Board to withdraw all  
21 requirements to comply with the RLs listed in Appendix I of the Amended Order subject to Item 1.1  
22 of the Amended Order, and instead revert to the RLs currently utilized by Chiquita's commercial  
23 laboratory, which are consistent with industry standards and protective of human health and the  
24 environment. Additionally, Chiquita seeks withdrawal of the unreasonable dilution, sample volume,  
25 and sample re-run obligations listed in Items 1.i(i-ii) of the Amended Order, which are unduly  
26 burdensome and bear no reasonable relationship to compliance standards required under the  
27 California Water Code, in violation of Water Code sections 13267 and 13383. Lastly, Chiquita  
28 requests that provisions of the Amended Order containing vague, inconsistent, and misleading

1 statements be withdrawn, including those that impose inconsistent compliance deadlines, to ensure  
2 clear and reasonable compliance expectations for Chiquita. Finally, the Amended Order should be  
3 modified to account for safety risks pursuant to established sampling protocols required by the  
4 State’s Industrial General Permit.

5 In the interim, Chiquita requests an immediate stay of the Amended Order, retroactive to the  
6 date the Amended Order was originally issued on February 11, 2026, pending resolution of this  
7 matter. (Wat. Code, § 13321, subd. (a)(1); Cal. Code Regs., tit. 23, § 2053, subd. (a).)

8 Lastly, Chiquita requests a formal adjudicative and evidentiary hearing on this Petition and  
9 request for stay so that the State Board may hear oral argument and receive evidence on the matters  
10 addressed in this Petition. (Cal. Code Regs., tit. 23, §§ 2052, subd. (c), 2053, and 648; Gov. Code, §  
11 11500.)

12 Chiquita reserves the right to amend this Petition and to supplement the accompanying  
13 Statement of Points and Authorities in support thereof. Chiquita also reserves the right to  
14 supplement the administrative record below. These reservations are appropriate and necessary  
15 considering the developing nature of the facts surrounding laboratory compliance capabilities, and  
16 because the Regional Board issued the Amended Order without providing Chiquita an opportunity  
17 to present the issues raised in this Petition and subsequently flatly refused to make any  
18 accommodations or modifications to the Amended Order.

19 **7. A STATEMENT OF POINTS AND AUTHORITIES IN SUPPORT OF LEGAL**  
20 **ISSUES RAISED IN THE PETITION:**

21 A Statement of Points and Authorities in support accompanies this Petition.

22 **8. A STATEMENT THAT THE PETITION HAS BEEN SENT TO THE**  
23 **APPROPRIATE REGIONAL BOARD AND TO THE DISCHARGERS, IF NOT THE**  
24 **PETITIONER:**

25 Chiquita provided a true and correct copy of this Petition electronically to:  
26 Susana Arredondo, Executive Officer  
27 The Los Angeles Regional Water Quality Control Board  
28 320 West 4th Street, Suite 200, Los Angeles, CA 90013  
Susana.Arredondo@waterboards.ca.gov

1 A true and correct copy was also sent to waterqualitypetition@waterboards.ca.gov.

2 **9. A STATEMENT THAT THE ISSUES RAISED IN THE PETITION WERE**  
3 **PRESENTED TO THE REGIONAL BOARD BEFORE THE REGIONAL BOARD**  
4 **ACTED, OR AN EXPLANATION OF WHY THE PETITIONER COULD NOT**  
5 **RAISE THOSE OBJECTIONS BEFORE THE REGIONAL BOARD:**

6 The Regional Board failed to provide Chiquita an opportunity to present its technical concerns  
7 prior to the Regional Board issuing the Amended Order and related requirements. One day  
8 following issuance of the Amended Order, Chiquita contacted Pavlova Vitale at the Regional Board  
9 to request a meeting to discuss its concerns related to technical inability to comply with many of the  
10 newly added monitoring requirements, among other concerns. (Exhibits 4-6.) Chiquita and the  
11 Regional Board discussed these concerns in a telephone conference on February 13, 2026, with  
12 Chiquita following up in writing on February 15, 2026 and February 16, 2026 requesting reasonable  
13 accommodations to further evaluate, including with its contracted commercial laboratory, the  
14 technical feasibility of complying with the new Amended Order requirements. (Exhibits 3 and 7.)

15 In both the telephone conference with the Regional Board and its follow up communications,  
16 Chiquita raised significant technical concerns, which are the subject of this Petition, that many of  
17 the new monitoring requirements, including updated RLs, sample volume and re-run obligations,  
18 sampling requirements related to the East Basin, and sample dilution limitations, were technically  
19 infeasible or would require additional time to evaluate. Additionally, Chiquita raised safety and  
20 access concerns associated with required sampling of the East and South Sedimentation Basins  
21 during storm events. In its response on February 20, 2026, the Regional Board wholly denied  
22 Chiquita's requests for reasonable accommodations to narrow compliance with monitoring  
23 requirements which had been initially identified as technically infeasible or to provide an extension  
24 of time to further evaluate the same. The Regional Board's response provided no explanation or  
25 further opportunity for discussion, instead stating that it would not "revise the amended order to  
26 provide any accommodation or additional time to comply." (Exhibit 3.)

27 Chiquita reserves the right to amend this Petition and to supplement the accompanying  
28 Statement of Points and Authorities in support thereof. Chiquita also reserves the right to

1 supplement the administrative record below. These reservations are appropriate and necessary  
2 considering the developing nature of the facts surrounding laboratory compliance capabilities, and  
3 because the Regional Board issued the Amended Order without providing Chiquita an opportunity  
4 to present the issues raised in this Petition and subsequently flatly refused to make any  
5 accommodations or modifications to the Amended Order.

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DATED: March 13, 2026

BEVERIDGE & DIAMOND, P.C.



Allyn L. Stern  
Jacob P. Duginski  
Megan L. Morgan  
*Attorneys for Petitioner Chiquita Canyon, LLC*

1 **STATEMENT OF POINTS AND AUTHORITIES**

2 **I. INTRODUCTION**

3 On February 11, 2026, the Los Angeles Regional Water Quality Control Board (“Regional  
4 Board”) issued to Chiquita Canyon, LLC (“Chiquita”) an Amended Investigative Order that  
5 includes 215 new reporting limits, of which at least 116 cannot be technically achieved, and dilution  
6 standards that ignore scientifically sound and necessary best practices of commercial laboratories.  
7 The Investigative Order’s existing reporting requirements were already far more stringent than  
8 Chiquita’s standard permitting requirements. Putting aside whether they are even achievable, these  
9 additional requirements were added without support or explanation and there was no attempt to  
10 demonstrate they are “reasonably required” or that the burden or cost of the requirements bear a  
11 “reasonable relationship” to the need for such requirements, as is required by the Water Code. The  
12 new reporting limits and dilution standards imposed by the Amended Order, among other newly  
13 imposed burdens on Chiquita, are neither appropriate nor proper and thus must be withdrawn, or in  
14 the alternative, modified to eliminate the requirements that contradict established and supported  
15 scientific best practices.

16 Specifically, the Amended Order: (1) imposes unreasonable and overly burdensome  
17 laboratory reporting limits (“RLs”) for surface water, stormwater, and groundwater, many of which  
18 are technically unattainable; (2) imposes costly and overly burdensome dilution, sample volume,  
19 and sample re-run obligations which fail to consider scientifically sound and widely-accepted  
20 laboratory practices; (3) imposes unreasonable and overly burdensome monitoring requirements  
21 regarding the East Basin which go far beyond established sampling and analysis parameters under  
22 State stormwater compliance standards; (4) fails to provide Chiquita with any written explanation or  
23 evidence in support of the need to comply with such unreasonable and overly burdensome  
24 requirements; and (5) includes conflicting timelines for multiple requirements.

25 As a result, Chiquita respectfully requests that the State Board order the Regional Board to  
26 withdraw the Amended Order in full. Alternatively, Chiquita requests that the State Board require  
27 the Regional Board to withdraw all RL requirements in Appendix I of the Amended Order and  
28 subject to Item 1.1 of the Amended Order, and revert to the RLs utilized by Chiquita’s commercial

1 laboratory, which are consistent with industry standards and sufficient to identify impacts to human  
2 health and the environment. Additionally, Chiquita seeks withdrawal of the unreasonable dilution,  
3 sample volume, and sample re-run obligations specifically listed in Items 1.l(i-ii) of the Amended  
4 Order which unduly burden the Petitioner and bear no reasonable relationship to compliance  
5 standards required under the California Water Code. Further, Chiquita seeks withdrawal of the  
6 unreasonable sampling and analysis parameters specified in Items 1.j and 1.l of the Amended Order  
7 associated with the East Basin which unduly burden the Petitioner and bear no reasonable  
8 relationship to State stormwater compliance standards. Lastly, Chiquita requests that provisions of  
9 the Amended Order containing inconsistent, false, misleading statements be withdrawn. Finally, the  
10 Amended Order should be modified to account for safety risks.

11 In the interim, Chiquita requests an immediate stay of the Amended Order retroactive to the  
12 date the Amended Order was originally issued on February 7, 2026, pending resolution of this  
13 matter. (Wat. Code, § 13321, subd. (a)(1); Cal. Code Regs., tit. 23 § 2052, subd. (a).) Chiquita  
14 further requests a formal adjudicative and evidentiary hearing on this Petition and request for stay  
15 so that the State Board may hear oral argument and receive evidence on the matters addressed in  
16 this Petition.

## 17 **II. BACKGROUND**

18 The Chiquita Canyon Landfill is a 639-acre landfill that opened in 1972 and served as the  
19 location for nearly a quarter of Los Angeles County’s municipal solid waste disposal needs before  
20 closing and ceasing to accept public waste effective January 1, 2025. The Landfill continues to  
21 operate under several permits and plans, including Waste Discharge Requirements (“WDRs”) Order  
22 No. R4-2018-0172, National Pollutant Discharge Elimination System Industrial General Permit  
23 Order 2014-0057-DWQ, and an updated September 2025 Stormwater Pollution Prevention Plan  
24 (“SWPPP”). The Landfill manages stormwater in relevant part using two stormwater sedimentation  
25 basins, the South and East Sedimentation Basins, industry-standard features that collect stormwater  
26 from the Landfill and allow sediments and other pollutants to settle out prior to discharge of more  
27 protective stormwater.

28 Due to an ongoing elevated temperature landfill event at the Landfill, the Regional Board

1 issued Investigative Order No. R4-2024-0010 on March 20, 2024 (“Investigative Order”). The  
2 Investigative Order required Chiquita to submit various workplans and reports to the Regional  
3 Board, and to install three new groundwater monitoring wells. Some of these obligations are  
4 ongoing, including quarterly monitoring of these groundwater wells. The Investigative Order also  
5 required sampling and analysis of any and all discharges into and out of the Landfill’s South Basin.  
6 In addition, the Investigative Order required the results of all analyses be submitted to the Regional  
7 Board within 30 days after the first day of the discharge event.

8         On February 11, 2026, the Regional Board issued Chiquita the Amended Order, imposing  
9 additional monitoring requirements including: (1) an expansion of sampling and reporting  
10 obligations related to the East Basin; (2) new, more stringent RLs on all groundwater, stormwater,  
11 and surface water analyses; and (3) requiring that Chiquita repeatedly and in some cases  
12 indefinitely, re-run all samples that require dilution during the laboratory analysis.

13         Upon receiving the Amended Order, Chiquita immediately engaged with the Regional  
14 Board to identify its concerns and discuss potential reasonable modifications to the Amended  
15 Order. In a February 12 email, Chiquita noted multiple upcoming storms and sampling obligations  
16 that would require immediate sampling under the Amended Order. (Exhibit 4.) Chiquita also  
17 requested in that same email a telephone conference to discuss its concerns with the Regional  
18 Board. During the February 13 telephone conference, Regional Board representative Catherine  
19 Hawe stated that should Chiquita face technical difficulties complying with the Amended Order, it  
20 could reach out to the Regional Board for assistance, including requesting reasonable  
21 accommodations related to compliance.

22         During this time, Chiquita sought and received initial input from its certified commercial  
23 laboratory, Enthalpy Analytical (“Enthalpy”), on the Amended Order’s RLs, as well as other new  
24 monitoring requirements. Enthalpy noted significant technical concerns with its ability to comply  
25 with many of the RLs and the need for more time to evaluate. Chiquita informed the Regional  
26 Board on February 15 that Enthalpy was incapable of meeting many of the RLs and that they were  
27 still assessing future compliance capability, including evaluating alternative commercial  
28 laboratories.

1 Chiquita requested reasonable accommodations and time extensions on February 16, in light  
2 of its imminent storm event sampling needs and Enthalpy’s ongoing evaluation of its ability to meet  
3 the Amended Order RLs. (Exhibit 3.) Four days later, the Regional Board rejected this request,  
4 stating that the Regional Board “is not going to revise the amended order to provide any  
5 accommodation or additional time to comply. The RLs are in effect as of the date of the issuance of  
6 the order.” (*Ibid.*)

7 Enthalpy has since confirmed that many of the monitoring requirements of the Amended  
8 Order are not technically feasible to comply with, including the RLs and dilution provisions in  
9 Items 1.1. (Exhibit 9.) Chiquita has evaluated other available commercial laboratories beyond  
10 Enthalpy to attempt to ensure compliance with the RLs in the Amended Order. Following initial  
11 outreach, Chiquita and its technical consultants have confirmed that the nine (9) alternative  
12 commercial laboratories contacted are unable to comply with many, if not all, of the RLs limited by  
13 Enthalpy. As of the date of this Petition, no commercial laboratory contacted in reasonable  
14 proximity to the Landfill has been identified which can meet all RLs required by the Amended  
15 Order.

### 16 **III. STANDARD OF REVIEW**

17 Under California Water Code section 13320, subdivision (a), any aggrieved person can file a  
18 petition for the State Water Quality Control Board (“State Board”) to review Regional Board  
19 actions. (Wat. Code, § 13320, subd. (a).) The State Board reviews petitions to determine whether an  
20 action or failure to act by the Regional Board was “appropriate and proper.” (Wat. Code, § 13320,  
21 subd. (c); Cal. Code Regs., tit. 23, § 2052, subd. (a).) Upon finding that the Regional Board’s action  
22 was inappropriate or improper, the State Board is authorized to direct the Regional Board to take  
23 appropriate action, refer the matter to another state agency having jurisdiction, take the appropriate  
24 action itself, or take any combination of those actions. (Wat. Code, § 13320, subd. (c).)

25 When determining whether a Regional Board’s actions are inappropriate or improper, the  
26 State Board must evaluate whether the Regional Board’s action is consistent with its statutory  
27 authorization to take the actions in question. The Regional Board may require “technical or  
28 monitoring program reports,” which includes analytical reports and reporting limits, if the burden,

1 including costs “bear[s] a reasonable relationship to the need for the report and the benefits to be  
2 obtained from the reports.” (Wat. Code, § 13267, subd. (b)(1).) The Regional Board must provide  
3 “a written explanation with regard to the need for the reports,” and “identify the evidence that  
4 supports requiring that person to provide the reports.” (*Ibid.*) When imposing methodology  
5 requirements, the Regional Board must show that such methods are “reasonably required.” (Wat.  
6 Code, § 13383, subd. (b).)

7 Under California Water Code section 13321, petitions to the State Board for review of  
8 Regional Board actions may include a request for a stay of a Regional Board decision or order. A  
9 stay of the Regional Board’s order must be granted if (1) there will be substantial harm to the  
10 petitioner or to the public interest if a stay is not granted; (2) there is a lack of substantial harm to  
11 other interested persons and to the public interest if a stay is granted, and; (3) there are substantial  
12 questions of fact or law regarding the disputed action. (Cal. Code Regs., tit. 23, § 2053.) The State  
13 Board can issue a stay effective as of the date of the Regional Board’s order. (Wat. Code, § 13321,  
14 subd. (c).)

#### 15 **IV. ARGUMENT**

##### 16 **A. THE AMENDED ORDER IMPOSES UNREASONABLE, UNDULY** 17 **BURDENSOME, AND TECHNICALLY INFEASIBLE REPORTING LIMITS**

18 The RLs imposed by the Amended Order are not “appropriate and proper.” These  
19 unreasonable and unduly burdensome obligations are, in many cases, technically unattainable by  
20 commercial laboratories. (Wat. Code, § 13320, subd. (c).) An RL is the lowest concentration of an  
21 analyte that a laboratory can reliably quantify and report using a particular method. The Regional  
22 Board may only order such laboratory methodologies that are “reasonably required.” (Wat. Code, §  
23 13383, subd. (b).) The Amended Order’s RLs are unreasonable as 116 of them, which is over half,  
24 are technically unattainable by Chiquita’s contracted laboratory. For others, laboratory  
25 modifications are required before compliance could be achieved and Chiquita cannot “immediately”  
26 comply with the RLs as required by the Amended Order. Lastly, the extraordinary costs of  
27 complying with the RLs bear no reasonable relationship to the need for them nor does the Regional  
28

1 Board present any justification or evaluation of the associated costs. The Water Board’s mandate of  
2 restrictive RLs for any and all sampling conducted is not reasonable, and must be withdrawn.

3 **1. MORE THAN HALF OF THE REPORTING LIMITS ARE**  
4 **TECHNICALLY UNATTAINABLE BY CHIQUITA’S CONTRACTED**  
5 **LABORATORY**

6 The Amended Order requires immediate compliance with 215 new numeric RLs listed in  
7 Appendix 1 of the Amended Order. These RLs apply to laboratory analysis from all “surface water  
8 monitoring, groundwater monitoring and from discharges into and out of the south sedimentation  
9 basin and east sedimentation basin for all purposes.” (Exhibit 2, p. 8.) Of these RLs, at least 116 are  
10 not currently technically attainable for varying reasons.

11 Chiquita’s contracted laboratory, Enthalpy, is unable to meet approximately 42 RLs listed in  
12 the Amended Order since the RLs are set so low that they are not commercially achievable without  
13 substantial investment of time and resources, if at all. (Exhibit 9.) These RLs are orders of  
14 magnitude lower than Enthalpy’s standard RLs for the same analytes, such that the laboratory’s  
15 existing instrumentation and analytical methods cannot readily meet the new RLs. (*Ibid.*) Even with  
16 new equipment (which could take months to procure) and new or substantially revised methods  
17 (which could take years to develop), these RLs are also likely unattainable for Chiquita’s  
18 stormwater samples due to sample conditions such as high sediment loading. (*Ibid.*)

19 Enthalpy also cannot currently meet an additional approximately 28 RLs listed in the  
20 Amended Order, but since they are within an order of magnitude of Enthalpy’s standard RLs, such  
21 RLs may be able to be met with further development of existing analytical methods. This work is  
22 expected to take weeks or months to complete for each analyte, and Enthalpy cannot guarantee  
23 ahead of time that it will be successful in meeting these 28 RLs. (Exhibit 9.)

24 Enthalpy further cannot meet approximately another 46 RLs listed in the Amended Order as  
25 Enthalpy—like many other commercial laboratories—is not accredited to analyze samples for these  
26 analytes. (Exhibit 9.) When combined, this represents approximately 116 RLs listed in the  
27 Amended Order which are either technically unattainable or require additional time to further  
28 evaluate potential compliance. This is patently unreasonable. It is neither appropriate nor proper to

1 require Chiquita to comply—immediately or at all—with requirements that its contracted laboratory  
2 and other laboratories simply cannot meet.

3 Chiquita and its technical consultants have evaluated other available commercial  
4 laboratories beyond Enthalpy in an effort to comply with the RLs in the Amended Order, but have  
5 confirmed that at least the nine (9) alternative commercial laboratories contacted are unable to  
6 comply with many, if not all, of the RLs that Enthalpy cannot comply with. As of the date of this  
7 Petition, no commercial laboratory contacted in reasonable proximity to the Landfill has been  
8 identified which can meet all RLs required by the Amended Order.

9 The Amended Order is also unreasonable because it requires detection and reporting of  
10 analyte levels that are below the minimum level the Regional Board could require to be attained  
11 under State Board Resolution No. 92-49, which is “background water quality, or the best water  
12 quality which is reasonable.” (State Board Resolution No. 92-49, *Policies and Procedures for*  
13 *Investigation and Cleanup and Abatement of Discharges Under Water Code Section 13304* (Oct 2,  
14 1996).) Many of the RLs in this case are more stringent than the background levels of analytes  
15 already present in the receiving soil or waters, and the Regional Board has presented no reason why  
16 such stringent RLs are needed.

17 The Regional Board’s expectation of immediate compliance from the date of issuance is  
18 particularly unreasonable in light of these facts. As an example, a major rain event occurred just  
19 days after issuance, which required same-day sampling under the existing Investigative Order. (See  
20 Investigative Order, Item 1.j.) Regular groundwater sampling was scheduled less than a week from  
21 the date of issuance. As explained above, Enthalpy could not and cannot comply with most of the  
22 new RLs, either at all or without time to identify and make the required adjustments. Chiquita  
23 likewise needed time to contact potential alternative laboratories, though it has found none to date  
24 in reasonable proximity to Chiquita that can satisfy all RLs listed in the Amended Order. As a  
25 result, Chiquita notified the Regional Board in writing that it would need additional time to comply  
26 with the Amended Order. Instead of working with Chiquita to provide needed and reasonable  
27 modifications to the Amended Order, the Regional Board rejected the request stating that it “is not  
28

1 going to revise the amended order to provide any accommodation or additional time to comply.”  
2 (Exhibit 3.) For all of these reasons, the RL requirements should be withdrawn.

3                   **2. THE REPORTING LIMITS FAIL THE WATER CODE’S**  
4                   **REASONABLENESS AND COST–BENEFIT REQUIREMENTS**

5                   Monitoring and reporting requirements imposed by the Regional Board must “bear a  
6 reasonable relationship to the need for the report and the benefits to be obtained from the reports.”  
7 (Wat. Code, § 13267, subd. (b)(1).) The RLs imposed by the Amended Order do neither. The  
8 Regional Board was required to explain how and why these new requirements are justified, but  
9 there was nothing in the Amended Order to support the need for 215 new numeric RL, many of  
10 which are excessively stringent. The Regional Board also failed to provide any assessment of the  
11 cost to Chiquita or attempt to evaluate the impacts of such costs. It is impossible for the Regional  
12 Board to have balanced costs and benefits when it failed to evaluate either side of the equation. For  
13 this reason alone, the Amended Order should be withdrawn. Further, the Regional Board is required  
14 to consult with dischargers and provide them “the opportunity to select cost-effective methods for  
15 detecting discharges or threatened discharges.” (State Board Resolution No. 92-49, *Policies and*  
16 *Procedures for Investigation and Cleanup and Abatement of Discharges Under Water Code Section*  
17 *13304* (Oct 2, 1996).)

18                   Regardless of the Regional Board’s failure to comply with its statutorily mandated  
19 balancing and evidence gathering exercises, the heavy burden of the Amended Order’s RLs, many  
20 of which are technically impossible to achieve, far exceeds any purported benefits. Many of the new  
21 RLs are below state drinking water RLs. (Exhibit 8.) But there is no basis for applying drinking  
22 water standards to discharges from Chiquita’s sedimentation basins or its groundwater monitoring  
23 wells. Under the Investigative Order, Chiquita is monitoring and analyzing industrial stormwater  
24 and groundwater that has no impact on drinking water supplies. The Regional Board has provided  
25 no support for why drinking water standards are necessary or provide a benefit in this case.

26                   Given that the Water Board has failed to present any evidence of a need or benefit from such  
27 stringent and technically infeasible RLs, Chiquita need only show a moderate cost to demonstrate  
28 an unlawful imbalance in the Amended Order. The costs of complying with the Amended Order are

1 unquestionably high. For many of the RLs, Chiquita has been unable to identify a commercial  
2 laboratory within a reasonable distance from the Landfill with the ability to meet these limits.  
3 Enthalpy, a nationally accredited laboratory, would likewise need to update its analytical methods  
4 on an analyte-by-analyte basis, which can take weeks, months, or even longer—and thus a  
5 substantial commitment of resources—to complete. (Exhibit 9.)

6 **B. THE AMENDED ORDER IMPOSES UNREASONABLE AND COSTLY**  
7 **DILUTION AND SAMPLE RE-ANALYSIS OBLIGATIONS**

8 The Amended Order requires Chiquita to “collect sufficient sample volume to allow the lab  
9 to re-run the analysis undiluted if diluted analyses are non-detect.” Item 34(a) of the Amended  
10 Order further dictates that “[i]f a sample is diluted and a target analyte is not detected, the sample  
11 shall be re-run at lesser dilutions until a detection without J flag is obtained or the RL is met.” This  
12 means that, for any sample that is diluted and results in a non-detect, the laboratory must re-analyze  
13 the sample in a more concentrated form, over and over again, until the equipment detects the  
14 analyte or a non-detect result is obtained against all RLs specified in the order. These requirements  
15 are impracticable, oftentimes will be impossible to meet, and bear no reasonable relationship to the  
16 need to understand potential contamination.

17 **1. THE DILUTION AND SAMPLE RE-ANALYSIS OBLIGATIONS ARE**  
18 **TECHNICALLY INFEASIBLE**

19 First, what constitutes a “sufficient sample volume” is unclear. Sample volumes may be  
20 limited by the type and location of sampling and there may be equipment limitations depending on  
21 where and by whom the sample is being collected. The East Basin inlet is a clear example of this:  
22 accessing that location is possible only by one person at a time, who must navigate a steep, often  
23 muddy slope—it is neither safe nor practically possible to collect samples from this location, and a  
24 requirement for larger samples only compounds that safety risk. Relatedly, Chiquita’s sampling  
25 crew cannot predict in advance whether a sample will have to be diluted in accordance with  
26 Enthalpy’s Standard Operating Procedures, nor the factor by which it may be diluted, such that they  
27 cannot know whether the standard sample volumes collected will be “sufficient” to meet the  
28 Amended Order’s requirements.

1 Second, some discharges into and out of the stormwater basins are very low in volume,  
2 particularly in the dry season. In such cases, there may not be enough liquid discharging into the  
3 basin to meet the Amended Order’s “sufficiency” requirement. Chiquita’s sample crew has  
4 observed and sampled discharges into the South Basin of such low flow that they were barely able  
5 to collect a sample at all—to collect a sufficient sample for hypothetically required future re-runs of  
6 particular analytical methods would not be possible.

7 Third, this methodology may damage critical laboratory equipment. (Exhibit 9.) Although  
8 most stormwater analyses to date have required little or no dilution, semi-volatile organic compound  
9 extracts, for example, can be dark in color, which indicates an extract with high levels of impurities.  
10 If run undiluted, as required by these newly imposed methodologies, those impurities can overload  
11 and damage laboratory equipment.

12 Fourth, this methodology may simply not work. Enthalpy has indicated that due to the use of  
13 internal standards, re-running samples undiluted will result in unusable data, particularly where  
14 there is interference such as sediment in the sample. (Exhibit 9.)

15 Finally, the holding times applicable to certain analytes may make the “re-run” requirement  
16 impossible. (Exhibit 9.) Holding times applicable to the analytes in the Amended Order are attached  
17 for reference. (*Id.* at Table 1.) Since Chiquita has no control over Enthalpy’s processing times, and  
18 there is commonly a high number of analyses to be run (not just on stormwater but also on  
19 Chiquita’s various wastewater streams), it can take four weeks or more for Chiquita to receive  
20 laboratory reports on stormwater samples, in part because of the uncommon analytes required to be  
21 tested. By that time, the holding time for multiple methods or analytes may be long-expired, making  
22 it technically impossible for Enthalpy to produce a valid re-analysis.

23 **2. THE DILUTION AND SAMPLE RE-ANALYSIS OBLIGATIONS FAIL**  
24 **THE WATER CODE’S REASONABLENESS AND COST-BENEFIT**  
25 **REQUIREMENTS**

26 Similar to the reporting limit issue, the Regional Board has made no attempt to justify the  
27 burdensome, vague, and technically infeasible dilution procedures against the need for or benefits  
28 of such a process. (Wat. Code, § 13267, subd. (b)(1); Exhibit 2, at p. 13.) The Regional Board has

1 in fact provided no basis for such a requirement other than a blanket statement in the Order that  
2 samples received to date are too diluted to produce meaningful data. This statement is contrary to  
3 scientifically acceptable dilution procedures utilized by accredited laboratories, and does not  
4 provide any meaningful information by which the Regional Board can weigh the cost with the  
5 benefit. As explained further below, sample dilution is at times necessary to obtain meaningful  
6 results and is only conducted when it is required and in accordance with Enthalpy's Standard  
7 Operating Procedures. Not only is endlessly re-running the sample infeasible, there is no benefit to  
8 the analysis or the ability to detect pollutants in doing so.

9 **3. THE REGIONAL BOARD MAKES FALSE ASSUMPTIONS**  
10 **REGARDING DILUTION**

11 The Regional Board's newly imposed dilution requirements are based on assumptions  
12 regarding standard and widely-used dilution procedures that are false. The Amended Order implies  
13 that the use of "significant dilution factors" renders results unreliable. (See Exhibit 2, ¶ 24.) This  
14 statement is misleading. Sample dilution is a necessary practice used by laboratories to obtain a  
15 meaningful data point, while protecting the laboratory equipment from damage. In this case,  
16 Enthalpy has only used dilution as required by and in accordance with Enthalpy's Standard  
17 Operating Procedures, most often to account for sample conditions like heavy sediment loading or  
18 high viscosity that could damage or interfere with equipment. (Exhibit 9.) Under such conditions,  
19 dilution ensures that the analytical results are reliable by eliminating interference in the sample.

20 And the evidence does not substantiate the apparent concern. Upon analysis of the 77 lab  
21 reports submitted to the Regional Board for stormwater analyzed since issuance of the Investigative  
22 Order on March 20, 2024, Chiquita found that approximately eighty-four (84) percent of data  
23 entries were analyzed and reported without dilution, while another nine (9) percent had a minimal  
24 dilution factor below 10 and usually closer to 2. Furthermore, a majority of the data entries with  
25 dilution factors of 10 or more related to analyses of chlorinated herbicides and organochlorine  
26 pesticides, which have only rarely (8 out of 150 samples) been detected in stormwater samples from  
27 the Landfill, and even then only at very low levels, often below the laboratory's applicable RLs.

28 At bottom, the Regional Board's apparent premise for the dilution requirements is baseless.

1 There is no evidence that improper or excessive dilution is occurring and in turn producing  
2 “unreliable” data. Indeed, the Amended Order *permits* dilution “when required by the sample  
3 conditions and the sample conditions shall be described in a case narrative or data qualifier.”  
4 (Exhibit 2, at p. 13.) To the extent dilution has ever been required, it was conducted under particular  
5 circumstances and in accordance with industry standards, in order to ensure quantifiable results and  
6 to protect Enthalpy’s equipment from damage. (Exhibit 9.) Adding case narrative descriptions is  
7 possible but not standard, and will take additional time to comply. (*Ibid.*) The State Board should  
8 order the Regional Board to withdraw these requirements as unreasonable and without evidentiary  
9 support.

10 **C. THE AMENDED ORDER IMPOSES UNREASONABLE AND UNDULY**  
11 **BURDENSOME SAMPLING AND ANALYSIS OBLIGATIONS**  
12 **ASSOCIATED WITH THE EAST BASIN**

13 The Amended Order requires immediate compliance with monitoring requirements  
14 associated with the East Basin that are likewise unreasonable, unduly burdensome, and bear no  
15 reasonable relationship with State stormwater compliance standards. Items 1.j and 1.l of the  
16 Amended Order require Chiquita to sample any and all discharges into the East Sedimentation  
17 Basin—a requirement not previously in the original Investigative Order—and analyze pursuant to  
18 an unreasonably extensive list of analyte parameters that go far beyond relevant parameters  
19 anticipated at a municipal landfill or required by the IGP. These parameters and sampling  
20 requirements lead Chiquita on an unduly burdensome search expedition every time there is a  
21 discharge into the East Basin for a wide-ranging and largely untethered list of analyte parameters  
22 that bear no reasonable relationship to existing stormwater compliance standards at the Landfill.  
23 Additionally, the Regional Board fails to provide Chiquita with any written explanation or evidence  
24 in support of the need to comply with these unreasonable and overly burdensome obligations for the  
25 East Basin.

26 As discussed in more detail below regarding safety concerns related to the East Basin,  
27 especially during wet weather events or nighttime hours, these sampling requirements further  
28 present significant safety concerns to Chiquita personnel and samplers who are tasked with

1 accessing an unpaved soil road with a 15% grade and sharp drop, and which becomes a major  
2 safety hazard in wet conditions. Such a requirement directly contradicts established sampling  
3 protocols pursuant to the IGP, the Landfill’s SWPPP, and industry standards, which are intended to  
4 ensure safe sampling conditions. As such, the Amended Order’s requirements for sampling  
5 discharges into the East Basin are unreasonably required and should be withdrawn entirely.

6 **D. THE AMENDED ORDER CONTAINS VAGUE, AMBIGUOUS, AND**  
7 **INCONSISTENT STATEMENTS**

8 In addition to the technically infeasible reporting limits and dilution protocols, several  
9 statements, deadlines, and timing expectations in the Amended Order are unclear as written, thereby  
10 creating unreasonable and inconsistent expectations for required compliance by Chiquita. For  
11 example, the Amended Order directs Chiquita on page 11 to “submit the following [technical  
12 report] by March 16, 2026.” However, the ensuing obligations in Items 1.a through 1.i have already  
13 been completed under the original Investigative Order issued in 2024. While some of the  
14 obligations in the Amended Order correctly state that “This Item has been completed,” other  
15 items—notably Items 1.d, 1.e, 1.f, and 1.g—are continuing obligations under the original  
16 Investigative Order. Other items, including Item 1.h, have been completed under the original  
17 Investigative Order, but the Amended Order does not state that “This Item has been completed,”  
18 like with the others. In fact, based on the language in the Amended Order, which requires that  
19 Chiquita “submit the following by March 16, 2026, except as otherwise noted below,” it is unclear  
20 what, if anything, is required to be submitted by March 16, 2026, based on the remaining  
21 requirements of the Amended Order.

22 Additionally, the Amended Order requires that analytical reports with sampling results from  
23 discharges into and out of the South and East Basins per Item 1.k must be submitted “within 30  
24 days of when results are received from the lab.” However, this conflicts with Item 1.j, which  
25 requires that these same reports be submitted “within 30 days of the first day of the discharge  
26 event.” While follow-up communications with the Regional Board have attempted to address this  
27 inconsistency, the Amended Order should be revised to include the new, more reasonable deadline  
28 of 30 days from receipt of results from the laboratory, and clarify all relevant deadlines so that

1 Chiquita may reasonably comply.

2 **E. THE AMENDED ORDER FAILS TO ENSURE SAFE SAMPLING**  
3 **PROTOCOLS CONSISTENT WITH CALIFORNIA WATER PERMITTING**  
4 **STANDARDS**

5 The Amended Order must be revised as it imposes, without limitation, sampling of all  
6 discharges into and out of the East and South Basins regardless of whether access or other safety  
7 concerns may be present at the Landfill. For example, though Item 1.j of the Amended Order  
8 requires sampling of “any and all discharges into and out of the south sedimentation basin and east  
9 sedimentation basin,” it does not specify or address industry standard practices and safety  
10 precautions for sampling should a discharge occur during nighttime hours. Chiquita maintains  
11 compliance with all IGP sampling procedures consistent with industry standards and the Landfill’s  
12 SWPPP. As outlined in the IGP and the Landfill’s SWPPP, stormwater sampling protocols require  
13 that sampling be undertaken only in certain conditions, including only sampling during regularly  
14 scheduled operating hours, during daylight hours, and when weather and site conditions are safe. In  
15 contrast, the Amended Order fails to stipulate the same sampling protocols geared towards safety.

16 The safety concerns posed by the Amended Order are further exacerbated now that  
17 Amended Order imposes monitoring requirements outlined in Item 1.j to the Landfill’s East Basin.  
18 The East Basin can only be accessed via an unpaved soil road with a 15% grade and a sharp drop,  
19 which becomes a major safety hazard in wet conditions. Particularly during nighttime hours, these  
20 conditions present unacceptable safety risks, including limited visibility, unstable ground  
21 conditions, and increased potential for slips, trips, and falls. It is not safe for Chiquita personnel or  
22 third-party samplers to access designated sampling locations during nighttime hours when  
23 discharges may occur. When Chiquita raised these safety concerns with the Regional Board during  
24 the February 13 meeting, the Regional Board arbitrarily bypassed the issue and simply suggested  
25 that a safe sampling location be identified, which Chiquita has not yet been able to identify. The  
26 Amended Order should therefore be revised to require the industry standard sampling safety  
27 protocols as outlined in the IGP and Landfill’s SWPPP.

1           **F.       A STAY OF THE AMENDED ORDER SHOULD BE ISSUED**

2           For the reasons set forth above and further explained below, Chiquita meets all three  
3 elements required for the State Board to grant a stay. (Cal. Code Regs., tit. 23, § 2053, subd. (a).) A  
4 stay is necessary because, without one, Chiquita will be substantially harmed and left with no  
5 adequate remedy while being forced to comply with the Amended Order’s unreasonable and  
6 technically infeasible requirements, thereby exposing itself to potential penalties and enforcement  
7 for alleged noncompliance. This also includes, among other harms, expending unnecessary and  
8 unreasonable time, resources, and costs in attempting to comply with the Amended Order. There is  
9 no indication that a stay will substantially harm other interested parties, the public interest, human  
10 health, or the environment. In fact, there is public interest in ensuring that California citizens and  
11 entities are not subject to unreasonable requirements which bear no reasonable relationship to  
12 stormwater compliance standards under the California Water Code. Thus, all factors pursuant to the  
13 California water regulations for a stay are met. (Exhibit 10.)

14                   **1. CHIQUITA WILL BE SUBJECT TO SERIOUS HARM WITHOUT A**  
15                   **STAY**

16           As outlined above, Chiquita cannot feasibly comply with many provisions of the Amended  
17 Order for reasons outside of its control. Even where Chiquita can comply with the new RLs,  
18 immediate compliance is not feasible. Nor can Chiquita guarantee that its contracted laboratory,  
19 Enthalpy, can re-run diluted samples indefinitely pursuant to Item 1.1.i-ii of the Amended Order  
20 given, among other qualitative limitations, the increased risk to laboratory equipment and integrity  
21 of the analytical data. Chiquita will therefore be substantially harmed without a stay.

22           Chiquita is subject to substantial penalties (up to \$10,000 per day) under the Amended  
23 Order for non-compliance based on obligations that are unreasonable, unduly burdensome, costly,  
24 and in some cases, technically unattainable by industry standards. Enthalpy has concluded that they  
25 will need additional time to undergo method development to meet many of the RLs in the Amended  
26 Order, and Chiquita will need time to identify other potential laboratories that may be able to meet  
27 many other RLs, though no laboratory has yet been identified which can meet all RLs required in  
28 the Amended Order. To date, Chiquita has contacted at least nine (9) laboratories within a one-

1 hundred fifty (150) minute drive of the Landfill, and not one laboratory has indicated they would be  
2 able to meet all of the new RLs contemplated by the Amended Order. Further, the costs and time  
3 needed to comply largely vary on a case-by-case basis. As such, a stay is necessary to prevent the  
4 ongoing substantial harm to Chiquita to allow the State Board to withdraw the Amended Order, or  
5 in the alternative, modify its requirements to allow Chiquita to reasonably comply.

6 **2. NO SUBSTANTIAL HARM WOULD RESULT TO OTHERS IF A STAY**  
7 **IS ISSUED**

8 No substantial harm will occur to other interested parties, the public interest, or human  
9 health and the environment if a stay is issued. Chiquita is already subject to stringent stormwater  
10 monitoring requirements pursuant to the IGP, SWPPP, and applicable WDRs. Additionally,  
11 Enthalpy's current standard RLs and related Standard Operating Procedures, including regarding  
12 dilution protocols, are consistent with industry standards. (Exhibit 9.) Lastly, the Regional Board  
13 has provided no evidence that there is a present substantial harm to human health or the  
14 environment relating to stormwater and groundwater quality. Therefore, there is no possibility of  
15 harm imposed by staying the Amended Order pending the State Board's review.

16 **3. SUBSTANTIAL QUESTIONS SURROUNDING THE VALIDITY OF THE**  
17 **ORDER REMAIN**

18 Lastly, the Amended Order should be stayed during the pendency of the State Board's  
19 review because substantial questions of law and fact remain. Based on the issues outlined above,  
20 there is substantial doubt about the validity of the Order based on the facts and California law.  
21 Further, the Amended Order and Regional Board fail to provide any written explanation or evidence  
22 in support of the need to comply with these unreasonable and overly burdensome requirements, as  
23 required for the Regional Board to satisfy its obligations under the Water Code.

24 In sum, a stay is required here because without one, Chiquita will be subjected to potential  
25 significant penalties and enforcement for any alleged non-compliance by the Regional Board for  
26 requirements that were impossible to come into immediate compliance with. Chiquita will also  
27 incur unnecessary and unreasonable time, resources, and costs attempting to comply with the  
28 Amended Order. There is no indication that a stay will substantially harm other interested parties,

1 the public interest, or human health and the environment, and there are clear questions of fact and  
2 law regarding the Amended Order.

3 **V. CONCLUSION**

4 The imposed monitoring requirements of the Amended Order are unreasonable, unduly  
5 burdensome, costly, and in some cases, simply technically unattainable. Of the 215 new RLs, 116  
6 cannot be achieved by a commercial laboratory identified by Chiquita. And even the remaining RLs  
7 are flawed as the Regional Board has failed to meet the balancing test required by the Water Code.  
8 The dilution protocols imposed by the Amended Order similarly are technically infeasible and in  
9 direct contradiction to established and widely accepted standard laboratory protocols. The sampling  
10 and parameter obligations associated with the East Basin also go far beyond established State  
11 stormwater compliance standards and present significant burdens on Chiquita. Finally, the  
12 Amended Order suffers from vague and ambiguous deadlines that are at times internally  
13 contradictory, and fails to account for necessary safety procedures that are standard for sampling  
14 protocols.

15 Chiquita requests that the State Board order the Regional Board to withdraw the Amended  
16 Order in full, or in the alternative, amend it in accordance with the arguments in this Petition, and,  
17 in the interim, issue a stay pending resolution of this appeal.

18  
19 DATED: March 13, 2026

BEVERIDGE & DIAMOND, P.C.

20  
21 

22 Allyn L. Stern  
23 Jacob P. Duginski  
24 Megan L. Morgan

25 *Attorneys for Petitioner Chiquita*  
26 *Canyon, LLC*

# **EXHIBIT 1**

---

**From:** Landon, Scott@Waterboards <Scott.Landon@Waterboards.ca.gov>  
**Sent:** Wednesday, February 11, 2026 5:01 PM  
**To:** dan.schooler@wasteconnections.com; mark.gingrich@wasteconnections.com  
**Cc:** Vitale, Pavlova@Waterboards; Matt Breuer  
**Subject:** Chiquita Canyon LLC Amended Order  
**Attachments:** CCL Cover Letter Final.pdf; CCL Amended Order\_Final.pdf

The California Regional Water Quality Control Board for the Los Angeles Region (Regional Board) provides copies of correspondence through e-mail. The attached is your copy of recent correspondence; only the addressee will receive a hard copy. The mailed copies include a red-lined copy to show the areas of the order that were amended.

The letter is in Adobe Acrobat PDF format. You can obtain an Acrobat Reader free of charge at <http://www.adobe.com/products/acrobat/readstep2.html>.

Thanks,



**Scott Landon, PE**

Water Resource Control Engineer

R4 LOS ANGELES  
R4 Compliance & Enforcement | R4 Enforcement II

Email: [Scott.Landon@Waterboards.ca.gov](mailto:Scott.Landon@Waterboards.ca.gov)  
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## Los Angeles Regional Water Quality Control Board

February 11, 2026

Mark Gingrich  
Chiquita Canyon LLC  
29201 Henry Mayo Dr.  
Castaic, CA 91384

Via Certified Mail  
Return Receipt Requested  
Claim No. 9589 0710 5270 2307 8867 59

Dan Schooler  
Chiquita Canyon LLC  
29201 Henry Mayo Dr.  
Castaic, CA 91384

Via Certified Mail  
Return Receipt Requested  
Claim No. 9589 0710 5270 2307 8867 97

**AMENDED ORDER AND REQUIREMENT FOR MONITORING AND REPORTING  
PURSUANT TO CALIFORNIA WATER CODE SECTION 13267 AND 13383 ORDER NO.  
R4-2024-0010-A01, CHIQUITA CANYON LANDFILL, CASTAIC, CALIFORNIA (FILE NO.  
67-020, ORDER NO. R4-2018-0172**

Dear Mark Gingrich and Dan Schooler:

The California Regional Water Quality Control Board, Los Angeles Region (Los Angeles Water Board) is the public agency with the primary responsibilities to protect ground and surface water quality for all beneficial uses within major portions of Los Angeles and Ventura Counties. Pursuant to California Water Code (CWC) sections 13267 and 13383, the Los Angeles Water Board is directing Waste Connections, Inc. and Chiquita Canyon LLC, which is a wholly-owned subsidiary of Waste Connections, Inc., (hereinafter together as the Discharger) to conduct additional stormwater monitoring of discharges into and out of the south sedimentation basin and east sedimentation basin using sufficiently sensitive methods.

Enclosed is the Amended CWC sections 13267 and 13383 Order No. R4-2024-0010-A01 (Order) requiring the Discharger to submit additional monitoring reports listed in the enclosed Order. This amended Order supersedes Order No. R4-2024-0010. A redline version of Order R4-2024-0010 is included as a courtesy to highlight the changes made to the Order.

You are required to comply with the Order as amended. The information is required pursuant to CWC sections 13267 and 13383. Pursuant to CWC section 13268, failure to comply with the Order as amended may subject the Discharger to administrative civil liability of up to \$1,000 for each day a report is not received by the Los Angeles Water

---

DAVID NAHAI, CHAIR | SUSANA ARREDONDO, EXECUTIVE OFFICER

Mark Gringrich  
Dan Schooler  
Chiquita Canyon, LLC

- 2 -

February 11, 2026

Board after the required deadline. Pursuant to CWC section 13385, failure to comply with the Order as amended may subject the Discharger to administrative civil liability of up to \$10,000 for each day a report is not received by the Los Angeles Water Board after the required deadline. The discretionary administrative civil liability may be assessed by the Los Angeles Water Board beginning with the date that the violation first occurred. The Los Angeles Water Board reserves its right to take any further enforcement action authorized by law, including referring this matter to the Attorney General's Office, which may result in higher liability amounts.

If you have any questions, please contact Pavlova Vitale at (213) 576-6751 or via email at [Pavlova.Vitale@waterboards.ca.gov](mailto:Pavlova.Vitale@waterboards.ca.gov) regarding this matter.

Sincerely,

---

Jenny Newman  
Assistant Executive Officer

Enclosures:

Order R4-2024-0010-A01  
Redline of Order R4-2024-0010-A01

cc: *(via e-mail only)*

Russ Colby, [Russ.Colby@waterboards.ca.gov](mailto:Russ.Colby@waterboards.ca.gov)  
Pavlova Vitale, [Pavlova.Vitale@waterboards.ca.gov](mailto:Pavlova.Vitale@waterboards.ca.gov)  
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Amy Miller, [miller.amy@epa.gov](mailto:miller.amy@epa.gov)  
Laura Friedli, [friedli.laura@epa.gov](mailto:friedli.laura@epa.gov)  
Todd Sax, [Todd.Sax@calepa.ca.gov](mailto:Todd.Sax@calepa.ca.gov)

# **EXHIBIT 2**

**INVESTIGATIVE ORDER NO. R4-2024-0010-A01**

**CALIFORNIA WATER CODE SECTION 13267 AND 13383  
ORDER TO PROVIDE A TECHNICAL REPORT FOR  
SURFACE AND SUBSURFACE INVESTIGATION**

**DIRECTED TO  
WASTE CONNECTIONS, INC. AND CHIQUITA CANYON, LLC**

**CHIQUITA CANYON LANDFILL  
CASTAIC, CALIFORNIA  
(FILE NO. 67-020, ORDER NO. R4-2018-0172, GEOTRACKER GLOBAL ID.  
L10003464243, WASTE DISCHARGE ID. 4 191022488)**

**AS AMENDED ON  
February 11, 2026**

The California Regional Water Quality Control Board, Los Angeles Region (Los Angeles Water Board) makes the following findings and issues this order to provide a technical report pursuant to California Water Code (Water Code) Sections 13267 and 13383 (Order). The Order requires that Waste Connections, Inc. and Chiquita Canyon, LLC, which is a wholly-owned subsidiary of Waste Connections, Inc., (hereinafter together as the Discharger) submit additional information for an investigation of potential surface water and groundwater impacts due to current conditions at the Chiquita Canyon Landfill (Landfill), located at 29201 Henry Mayo Drive, Castaic, California, as observed during the Los Angeles Water Board inspections conducted on October 3, 2023, November 2, 2023, January 29, 2024, February 20, 2024, April 9, 2024, January 28, 2025, September 18, 2025, December 22, 2025, December 30, 2025 and January 2, 2026.

1. The Landfill is a Class III municipal solid waste (MSW) landfill and is owned and operated by Chiquita Canyon LLC, which is a wholly-owned subsidiary of Waste Connections, Inc. The Landfill is a 639-acre waste management facility, of which 400 acres are designated for landfill operations. It is roughly divided into six fill areas: Primary Canyon, Canyons A, B, C, and D, and the Main Canyon. Primary Canyon (54 acres) is unlined and Canyon B (15 acres) is lined with a clay bottom and flexible membrane liner on the side slopes. Both have been filled to capacity. The remaining fill areas are equipped with a liner and leachate collection and removal system (LCRS). The Landfill is actively accepting MSW in a lined area.
2. The Landfill started receiving wastes in 1974 under operation by the Chiquita Canyon Landfill Company. Operation of the Landfill was transferred to Laidlaw

Waste Systems, Inc., in 1987, Allied Waste Services, Inc., in 1996, and USA Waste Services Company (aka Waste Management) in 1997. In January 1999, Republic Services acquired the Landfill from Waste Management. In April 2009, the Chiquita Canyon Landfill, LLC acquired the Landfill from Republic Services.

3. The Landfill was previously regulated by the Los Angeles Water Board under Waste Discharge Requirements (WDRs) Order No. 84-8 for the discharge of inert and non-hazardous solid wastes; Order No. 84-8 was adopted on January 23, 1984, and amended by Order No. 87-28 on March 23, 1987, to revise the waste disposal fill rate from 2,000 tons per day to 5,000 tons per day. On May 22, 1989, the Los Angeles Water Board adopted Order No. 89-52 which replaced Order Nos. 84-8 and 87-28. On November 2, 1998, the Los Angeles Water Board adopted WDR Order No. 98-086, which terminated Order No. 89-52 and included the vertical and lateral expansion of the Landfill as approved by the Los Angeles County Board of Supervisors in the Conditional Use Permit (CUP) No. 89-081(5) on May 20, 1997.
4. The Landfill is currently regulated under the WDRs contained in Order No. R4-2018-0172, which was adopted by the Los Angeles Water Board and became effective on December 13, 2018 and includes a MRP (CI 6231). Order No. R4-2018-0172 superseded Order No. 98-086 and updated requirements for operational and maintenance activities at the Landfill and included expansion of the Landfill as approved by Los Angeles County Board of Supervisors in the Conditional Use Permit (CUP) No. 200400042 in 2017.
5. Stormwater runoff from the Landfill is separately regulated under the National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Industrial Activities, NPDES No. CAS000001 (Industrial General Permit, WDID No. 4 19I022488, Notice of Intent (NOI) dated January 26, 2015); stormwater discharges are directed to on-site sedimentation basins which serve to reduce sediments and other pollutants from the discharge. The Landfill is also currently enrolled under the NPDES General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities, NPDES No. CAS000002 (Construction General Permit, WDID No. 419C397764, NOI dated May 20, 2022) for the Chiquita Canyon Landfill Entry Gates project.
6. The Landfill is located within the Santa Clara River Hydrologic Subarea which is part of the Santa Clara-Calleguas Hydrologic Unit. It is surrounded on three sides by ridges that restrict inflow to seasonal precipitation. The resultant

groundwater flows in alluvium and in the sedimentary bedrock of the Saugus and the Pico formations, generally following the surface topography and exiting the canyon to the south. Most of the site drains south toward the Santa Clara River flood plain, which flows along the south side of State Route 126. The northeast portion of the site drains eastward into Castaic Creek, approximately 3,000 feet from the site boundary, which then flows south toward the Santa Clara River. Beneficial uses for Reach 5 of the Santa Clara River and Castaic Creek include Municipal and Domestic Supply (MUN); Industrial Service Supply (IND); Industrial Process Supply (PROC); Agricultural Supply (AGR); Ground Water Recharge (GWR); Freshwater Replenishment (FRSH); Warm Freshwater Habitat (WARM); Wildlife Habitat (WILD); Rare, Threatened, or Endangered Species (RARE); Water Contact Recreation (REC-1); and Non-contact Water Recreation (REC-2). Beneficial uses for the underlying groundwater basins include MUN, IND, PROC, and AGR. The Landfill is located outside of a 100-year flood plain, according to the Federal Emergency Management Agency, Flood Insurance Rate Map.

7. Land uses surrounding the Landfill include primarily open space to the north and rural residential development to the west and northwest. The closest residential area is located approximately 500 feet from the northwest property boundary and 1,200 feet from the Landfill footprint. Intervening topography prevents views of the operating landfill from the residential area. The property immediately west and south of the Landfill is either vacant or used for agricultural activities. The property immediately across State Route 126 from the Landfill has been permitted for residential development, including an elementary school.
8. The Landfill is currently under a corrective action program (CAP) as required under the WDRs, which began in 1998, for the detection of volatile organic compounds (VOCs) at three groundwater monitoring wells, DW-1 near Primary Canyon, DW-3 at Canyon B, and DW-20 near Canyon D. VOCs detected in groundwater at the impacted monitoring wells include 1,1-dichloroethane (1,1-DCA), 1,2-dichloroethane, 1,4-dichlorobenzene, benzene, cis-1,2-dichloroethene, dichlorofluoromethane, methylene chloride, trichloroethylene (TCE), perchloroethylene (PCE), and vinyl chloride. TCE, PCE, and 1,1-DCA are the constituents most frequently detected. In 2016, DW-20 was added to the list of CAP wells, and was abandoned and replaced with well DW-29 in 2018 due to an expansion of the Landfill. In 2005, well DW-16, which is located at the northern edge of the Primary Canyon unit, was enrolled under an evaluation monitoring program for the detection of VOCs (TCE and PCE) in the

well. It was determined that VOC pollution at the Landfill was caused by the migration of landfill gas (LFG) to groundwater. The CAP includes an enhanced LFG collection and control system aimed at reducing subsurface gas migration to groundwater. The CAP measures appear to be effective since VOC concentrations at the impacted wells have been declining over time, most to below detection limits. Data from the 2023 annual report submitted in January 2024 reported that VOCs were not detected in wells DW-1 and DW-29, some VOCs detected at trace concentration in DW-16, and dichlorodifluoromethane was detected in well DW-3 at 2.1 parts per billion.

9. In early July 2023, Los Angeles Water Board staff was notified by the Los Angeles County Local Enforcement Agency (LEA) of a potential LFG problem at the site due to an ongoing landfill reaction. On July 21, 2023, Los Angeles Water Board staff contacted the Discharger, via email, concerning the reaction, who then provided information on reaction landfills in the Country. Multiple odor complaints from the public were received by the South Coast Air Quality Management District (SCAQMD). The LEA and other regulatory agencies had been working with the Discharger to understand the cause of increased LFG levels and to bring the Landfill into compliance with requirements from the regulatory agencies. The reported odors appeared to be coming from the northwestern portion of the Main Canyon of the Landfill, where the LFG was measured to be unusually hot and contained larger amounts of condensate than normal. The Discharger's representative, in a telephone conversation, indicated to Los Angeles Water Board staff that a portion of the Landfill was producing large amounts of gas containing a large amount of water and dimethyl sulfide (DMS); the hot wet gas was harmful to landfill flares which operate optimally when the gas is dry. Additionally, an area of approximately 20 acres had experienced subsidence of up to 16 to 18 feet, giving an appearance of a crater. This portion of the landfill is now being referred to as the Reaction Area. During a telephone conversation in July, the Discharger also indicated that leachate production increased from about 30,000 gallons per day (GPD) to around 100,000 GPD. However, the Discharger's representative indicated there was too much water in the gas for a fire to occur.
10. On September 28, 2023, the Los Angeles County LEA informed Los Angeles Water Board staff of leachate seepage observed at the Landfill during the LEA's September 19, 2023, inspection. The Discharger indicated to the LEA that the leachate seepage was caused by the reaction in the Reaction Area and was collecting the leachate in onsite leachate storage tanks before disposing the leachate offsite.

11. On October 3, 2023, Los Angeles Water Board staff conducted an inspection of the Landfill, during which staff observed a leachate seep at the north-western portion of the Main Canyon that flowed from the edge of the Landfill to an onsite concrete drainage channel that leads to the stormwater sedimentation basin at the southern border of the Landfill. The Discharger had placed several soil berms along the onsite concrete channel to capture and pump off the leachate before it reached the sedimentation basin. The leachate seepage had not been previously reported to the Los Angeles Water Board by the Discharger.
12. On October 17, 2023, Los Angeles Water Board staff received an email from the public stating leachate had been leaking out of the northwest side of the landfill.
13. On November 2, 2023, a joint inspection of the Landfill was conducted by multiple regulatory agencies, including SCAQMD, the LEA, and Los Angeles Water Board staff. Los Angeles Water Board staff observed that the leachate seep, as noted during the October 3, 2023 inspection, was still occurring.
14. On November 22, 2023, the Los Angeles Water Board issued a Notice of Violation (NOV) to the Discharger, for violations of the WDRs observed during the October 3, 2023 inspection. The NOV cited violations of Sections F.6 and B.3 of Order No. R4-2018-0172 for the operation of a leachate and landfill-gas condensate containment system that is inadequate to prevent commingling of leachate and gas condensate with surface water run-on and runoff during a rain event, and the failure to report the leachate seep that was observed at the landfill during the inspection within 24 hours of discovery. The NOV requested the Discharger submit a written response to the Los Angeles Water Board to include corrective actions taken and actions planned to mitigate conditions of the Landfill in violation of the WDRs by December 22, 2023. Additionally, the NOV requested the Discharger submit a final report to the Los Angeles Water Board to demonstrate that the Landfill complies with the WDRs by February 20, 2024.
15. On December 22, 2023, the Discharger submitted a Response to the NOV. The response provided the following updated information:
  - a. The Discharger is installing extraction wells in the Reaction Area to remove leachate.
  - b. The Discharger is installing a French drain along the outer edge of the liner in the Reaction Area to capture leachate before it exits the Landfill

cell.

- c. The Discharger is increasing the Landfill's leachate storage capacity.
  - d. The Discharger is performing regular inspections of the slopes west and north of the Reaction Area.
16. The Final Report in response to the NOV, received on February 20, 2024, describes the difficulties of the reaction and how the Discharger is managing leachate and seeps, dewatering the Reaction Area with pumps and a French drain, placing a geosynthetic cover over the entire Reaction Area, continuing to add gas extraction wells, and conducting a minimum of two inspections a day of the Reaction Area.
17. On December 29, 2023, the Discharger submitted a notification to Los Angeles Water Board staff regarding a leachate seep discovered to have reached an onsite concrete channel at the west perimeter road on December 22, 2023, following a heavy rain event. The Discharger indicated that pooling of water on top of a scrim (a temporary cover over the Reaction Area) pushed aside sandbags used to weigh down the scrim at the bottom of the Landfill slope, washed out sections of the perimeter road, and caused the leachate underneath to be forced out of the scrim instead of flowing along its normal path downhill towards a collection sump. As a result, portions of the leachate reached the onsite concrete-drainage channel. Following the discovery, the Discharger installed a check dam on the onsite concrete drainage channel to contain and pump out leachate from the onsite concrete drainage channel using a vacuum truck, as well as rainwater off the scrim to prevent further pooling. The Discharger subsequently implemented additional corrective measures, including repair of the perimeter road and replacement of sandbags, pressure-washing of the onsite concrete channel, and installation of a 10-foot berm at the base of the western slope to assist with directing rainwater off the scrim. The Discharger took samples on December 28, 2023 from the south stormwater sedimentation basin to test for leachate parameters; the analytical data showed ammonia (as N) at 4.7 milligrams per liter (mg/L), p-cresol and phenol at 0.016 and 0.015 mg/L, respectively, and arsenic, chromium, iron, and zinc at 0.021, 0.015, and 0.14 mg/L, respectively. Stormwater samples collected by the Discharger on December 22 and December 28, 2023 showed detections of iron, biochemical oxygen demand, total suspended solids, oil and grease, and E. Coli above benchmarks, with E. Coli detected at 650,000 MPN/100 mL.

18. On January 29, 2024, Los Angeles Water Board staff from the Stormwater Unit conducted an inspection at the Landfill to evaluate compliance with the Industrial General Permit. Los Angeles Water Board staff observed a leachate seepage area located across an onsite concrete drainage channel. Landfill personnel were pressure-washing the channel and had placed a soil check dam downgradient of the channel to capture wastewater; a vacuum truck was removing the wastewater from the channel. The onsite concrete drainage channel activities occurred upgradient and in close proximity to the sedimentation basin and where the channel discharges into the basin. Implementation of best management practices (BMP) to prevent migration of leachate and runoff into the channel was inadequate.
19. On February 4, 2024, heavy rain events occurred at the Landfill. Los Angeles Water Board staff requested information and photographs of additional BMPs implemented onsite to prevent leachate migration; however, the Landfill did not provide this information.
20. On February 20, 2024, Los Angeles Water Board staff conducted a joint inspection with multiple regulatory agencies; leachate seepage was still occurring in the same area as observed during the January 29, 2024 inspection. In addition, no additional measures or adequate BMPs were observed in place between the drainage channel and leachate seepage area to prevent leachate migration; muddy water was observed in the channel. The outfall of the south sedimentation basin was also observed discharging water.
21. During the review of past WDR submittals, Los Angeles Water Board staff's findings during previous inspections, information provided by other regulatory agencies, the Discharger's December 22, 2023 response to the NOV, and subsequent failures of the short-term measures to prevent leachate from commingling with stormwater runoff, Los Angeles Water Board staff has identified a list of additional information and documents that are needed to further investigate and assess potential impacts to groundwater and surface water due to the current conditions at the Landfill.
22. On June 27, 2024, the Los Angeles Water Board issued an NOV to the Landfill for failure to fully comply with Order No. R4-2024-0010.
23. On January 1, 2025, The Landfill stopped accepting waste and has ceased active waste disposal operations.
24. On April 22, 2024, R4-2024-0010 was issued to the Landfill. Since the

implementation of Order No R4-2024-0010, the Landfill has been submitting monitoring data obtained from laboratory analysis that have significant dilution factors, rendering the result unreliable for determining the presence of pollutants.

25. This amended Order No. R4-2024-0010-A01 stipulates reporting limits for laboratory analysis from surface water monitoring, groundwater monitoring and from discharges into and out of the south sedimentation basin and east sedimentation basin for all purposes under this amended Order or other Water Boards orders, including, but not limited to, R4-2018-0172 and Industrial General Permit, WDID No. 4 19I022488, Notice of Intent (NOI) dated January 26, 2015.

26. Water Code section 13267, subdivision (b)(1), states, in part:

- a. "In conducting an investigation specified in subdivision (a), the regional board may require that any person who has discharged, discharges, or is suspected of having discharged or, discharging, or who proposes to discharge waste within its region, or any citizen or domiciliary, or political agency or entity of this state who has discharged, discharges, or is suspected of having discharged or discharging, or who proposes to discharge waste outside of its region that could affect the quality of waters within its region shall furnish, under penalty of perjury, technical or monitoring program reports which the regional board requires. The burden, including costs, of these reports shall bear a reasonable relationship to the need for the reports and the benefits to be obtained from the reports. In requiring those reports, the regional board shall provide the person with a written explanation with regard to the need for the reports and shall identify the evidence that supports requiring that person to provide the reports."

27. Water Code section 13383, subdivision (a), states, in part:

- a. "The state board or a regional board may establish monitoring, inspection, entry, reporting, and recordkeeping requirements ... for any person who discharges, or proposes to discharge, to navigable waters..."

28. This Order requires the Discharger to prepare and submit a technical report to provide additional information related to Chiquita Canyon Landfill's plan to return to compliance with its WDRs and NPDES permits. The information is

needed for the Los Angeles Water Board's investigation of potential impacts to waters of the State and the United States caused by the Landfill reaction and resulting excessive leachate production. The chemicals in Landfill leachate, if discharged to surface or groundwater in excess of water quality objectives, could pose a serious risk to the beneficial uses of those waters. Therefore, more information on the potential discharge of Landfill leachate is needed. The Discharger must submit a complete report as required by this Order. The Los Angeles Water Board may reject the report if it is deemed incomplete or if the Los Angeles Water Board requires revisions to the report under this Order. As set forth in more detail below, the burdens, including the costs, of preparing this report bear a reasonable relationship to the need for the report and the benefits to be obtained from the report.

29. The report required by this Order pursuant to Water Code section 13267 seeks information that is or should be in the possession of the Discharger and the installation of three additional groundwater monitoring wells. The cost for the Discharger to comply with this Order is expected to be less than \$300,000. Given the intended benefits the report is expected to generate, the burden of producing the report required by this Order bears a reasonable relationship to the need for the report and the benefits to be gained from the report.
30. The issuance of this Order is an enforcement action by a regulatory agency and is categorically exempt from the provisions of the California Environmental Quality Act (CEQA) pursuant to California Code of Regulations, title 14, section 15321, subdivision (a)(2). This Order requires submittal of a technical report. It is unlikely that compliance with this Order could result in physical changes to the environment. If the implementation of this Order may result in significant impacts on the environment, the appropriate lead agency will address the CEQA requirements prior to approval of any such action.
  - a. Any person aggrieved by this action of the Los Angeles Water Board may petition the State Water Board to review the action in accordance with Water Code section 13320 and California Code of Regulations, title 23, sections 2050, et seq. The State Water Board must receive the petition by 5:00 p.m., 30 days after the date of this Order, except that if the thirtieth day following the date of this Order falls on a Saturday, Sunday, or state holiday, the petition must be received by the State Water Board by 5:00 p.m. on the next business day. Copies of the law and regulations applicable to filing petitions may be found at:

Mark Gingrich  
Dan Schooler  
Chiquita Canyon, LLC

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February 11, 2026

[http://www.waterboards.ca.gov/public\\_notices/petitions/water\\_quality](http://www.waterboards.ca.gov/public_notices/petitions/water_quality) or  
will be provided upon request.

**THEREFORE, IT IS HEREBY ORDERED** that the Discharger, pursuant to Water Code section 13267, subdivision (b), is required to submit the following by March 16, 2026<sup>1</sup>, except as otherwise noted below:

1. A technical report containing the following items:

- a. A workplan to install a groundwater well south of the Main Canyon portion of the Landfill, down gradient of the Reaction Area and north of well DW-29. The well shall be placed to monitor for a possible leachate release due to either a compromised liner or the overtopping of leachate to the ground surface. This item has been completed.
- b. The workplan shall also include installation of a groundwater monitoring well down gradient of the southern stormwater sedimentation basin. This Item has been completed.
- c. The workplan shall also include installation of an offsite groundwater monitoring well, between the southern border of the Landfill and the Santa Clara River. This item has been completed.
- d. These new wells and existing wells DW-9, DW-15, DW-16, DW 17 and DW-29 will be placed in an evaluation monitoring program; therefore, the monitoring frequency for the most current list of Monitoring Parameters (MPars) shall be quarterly. If, after two years following resolution of the elevated temperature condition in the Reaction Area, the wells have not had any detections, the Discharger may request that wells be placed into a detection monitoring program (DMP), as approved by the Los Angeles Water Board Executive Officer or their delegate.

**Quarterly Monitoring, Reporting Period and Report Due Dates**

<b>Monitoring Report</b>	<b>Reporting Period</b>	<b>Report Due Date</b>
1 <sup>st</sup> Quarter	January 1 – March 31	April 15
2 <sup>nd</sup> Quarter	April 1 – June 30	July 15
3 <sup>rd</sup> Quarter	July 1 – September 30	October 15
4 <sup>th</sup> Quarter	October 1 – December 31	January 15

- e. In addition to the most current list of MPars in the MRP, a full scan of Appendix II Constituents in 40 CFR, part 258 shall also be performed at the

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<sup>1</sup> The modifications in the February 11, 2026 update to this Order only modify the deadlines for new requirements. The Los Angeles Water Board retains enforcement authority to pursue any action authorized by law based on failure to comply with the requirements of this Order as originally issued.

new groundwater monitoring wells within thirty days of installation. Following the initial sampling event, the new wells together with the existing wells identified in item d above will be placed in biennial testing for Appendix II Constituents.

- f. A quarterly assessment, monitoring, and reporting of the sampling results from the new groundwater monitoring wells and the integrity of the bottom liner and LCRS within the Reaction Area

Pursuant to Water Code section 13383, submit the following:

- g. For storms that produce a discharge into the sedimentation basin, a post-storm event assessment and report on the effectiveness of the geosynthetic cover that will be installed over a portion of the area impacted by the reaction to prevent leachate from commingling with stormwater until the elevated Landfill temperature condition has resolved. This report is due 30 days after the first day of the storm event that produces a discharge.
- h. A report documenting implementation, operation and maintenance of BMPs and any other measures preventing leachate migration with stormwater runoff into onsite drainage channels, drain inlets, and inlets to the south sedimentation basins.
- i. The Discharger shall update its Storm Water Pollution Prevention Plan and Monitoring Implementation Plan (SWPPP) as required by Industrial General Permit to enhanced discharge monitoring as required by this Order. An updated SWPPP shall be uploaded to SMARTs no later than April 19, 2026.
- j. The Discharger shall sample and submit the analysis of any and all discharges into and out of the south sedimentation basin and east sedimentation basin. Analytes shall include parameters identified in the effluent limitation guidelines in Subchapter N, Subpart B—RCRA Subtitle D Non-Hazardous Waste Landfills, Mpars, parameters the Discharger is required to sample per the Industrial General Permit including TMDL related requirements in Attachment E, and Appendix II constituents. All results must be submitted to the Los Angeles Water Board within 30 days of the first day of the discharge event. Where parameters overlap, or are otherwise duplicative, only a single analysis is required to satisfy the requirements of this Order.
- k. The laboratory reports in pdf format shall be submitted to the Los Angeles Water Board within 30 days of when results are received from the lab.

- I. The Discharger shall ensure that all laboratory analyses, of all monitoring of surface water, groundwater, and discharges into and out of the south sedimentation basin and east sedimentation basin for all purposes under this amended Order or other Water Boards orders, are performed by an Environmental Laboratory Accreditation Program (ELAP) certified laboratory<sup>2</sup> according to sufficiently sensitive test procedures and conducted according to test procedures under 40 Code of Federal Regulations Part 136, including the observation of holding times, unless other test procedures have been specified by the Los Angeles Water Board or are required under 40 Code of Federal Regulations Chapter I Subchapter N. At a minimum, the reporting limits listed in Appendix 1 of this Order shall be met.
  - i. The Discharger shall collect sufficient sample volume to allow the lab to re-run the analyses undiluted if diluted analyses are non-detect.
  - ii. Dilution of samples is permitted when required by the sample conditions and the sample conditions shall be described in a case narrative or data qualifier. If a sample is diluted and a target analyte is not detected, the sample shall be re-run at lesser dilutions until a detection without J flag is obtained or the reporting limit is met.
2. The above items shall be electronically submitted to:

Pavlova Vitale  
Los Angeles Regional Water Quality Control Board  
Email: [Pavlova.Vitale@waterboards.ca.gov](mailto:Pavlova.Vitale@waterboards.ca.gov)
3. Pursuant to Water Code section 13268, subdivision (a), any person who fails to submit reports in accordance with the Order is guilty of a misdemeanor. Pursuant to Water Code section 13268, subdivision (b)(1), failure to submit the required technical report described above by the specified due date(s) may result in the imposition of administrative civil liability by the Los Angeles Water Board in an
4. amount up to one thousand dollars (\$1,000) per day for each day the technical

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<sup>2</sup> The Environmental Laboratory Accreditation Program (ELAP) has certified laboratory methods for all subchapter N parameters required to be monitored by this Order.

report is not received after the above due date.

5. Pursuant to Water Code section 13385, subdivision (a)(3), a violation of a requirement established by Water Code section 13383, may result in the imposition of administrative civil liability by the Los Angeles Water Board in an amount up to ten thousand dollars (\$10,000) per day for each day the technical report is not received after the above due date. These civil liabilities may be assessed by the Los Angeles Water Board for failure to comply, beginning with the date that the violations first occurred, and without further warning.
6. The Los Angeles Water Board, under the authority given by Water Code section 13267, subdivision (b)(1), requires the Discharger to include a perjury statement in all reports required by this Order. The perjury statement shall be signed by a senior authorized representative of the Discharger (not by a consultant). The perjury statement shall be in the following format:

“I, [NAME], certify under penalty of law that this document and all attachments were prepared by me, or under my direction or supervision, in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.”

SO ORDERED.

 Digitally signed by Jenny Newman  
Date: 2026.02.11 14:27:23 -08'00'  
Water Boards

\_\_\_\_\_  
Jenny Newman  
Assistant Executive Officer

02/11/2026  
Date

Attachments:

Appendix 1: Reporting Limits Table

Mark Gingrich  
Dan Schooler  
Chiquita Canyon, LLC

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February 11, 2026

### Appendix 1: Reporting Limits

Compound Name	Method Reporting Limit <sup>3</sup>	Units
1,1,1,2-Tetrachloroethane	0.5	ug/L
1,1,1-Trichloroethane; Methylchloroform	0.5	ug/L
1,1,2,2-Tetrachloroethane	<0.17	ug/L
1,1,2-Trichloroethane	<0.5	ug/L
1,1-Dichlorobenzene	0.5	ug/L
1,1-Dichloroethane; Ethyldidene chloride	0.5	ug/L
1,1-Dichloroethylene; 1,1- Dichloroethene;	<0.057	ug/L
1,1-Dichloropropene	0.5	ug/L
1,2,3-Trichloropropane	<0.0007	ug/L
1,2,4,5-Tetrachlorobenzene	10	ug/L
1,2,4-Trichlorobenzene	<0.071	ug/L
1,2-Dibromo-3-chloropropane; DBCP	<0.0017	ug/L

<sup>3</sup> footnote: Compounds with "No RL" currently do not have a defined reporting level and are not subject to the thresholds in this order

1,2-Dibromoethane; Ethylene dibromide; EDB	<0.05	ug/L
1,2-Dichloroethane; Ethylene dichloride	<0.38	ug/L
1,2-Dichloropropane	0.5	ug/L
1,3-Dichloropropane; Trimethylene dichloride	0.5	ug/L
1,4-Dichlorobenzene	0.5	ug/L
1,4-Dioxane	<1.3	ug/L
1,4-Naphthoquinone	10	ug/L
1-Naphthylamine	20	ug/L
2,2-Dichloropropane; Isopropylidene chloride	0.5	ug/L
2,3,4,6-Tetrachlorophenol	10	ug/L
2,3,7,8-TCDD; 2,3,7,8-Tetrachlorodibenzo- p-dioxin	<0.00000013	ug/L
2,4,5-T; 2,4,5-Trichlorophenoxyacetic acid	No RL	
2,4,5-Trichlorophenol	<2.1	ug/L
2,4,6-Trichlorophenol	10	ug/L

2,4-D; 2,4-Dichlorophenoxyacetic acid	No RL	
2,4-Dichlorophenol	10	ug/L
2,4-Dimethylphenol; m-Xylenol	10	ug/L
2,4-Dinitrophenol	50	ug/L
2,4-Dinitrotoluene	<0.11	ug/L
2,6-Dichlorophenol	10	ug/L
2,6-Dinitrotoluene	10	ug/L
2-Acetylaminofluorene; 2-AAF	20	ug/L
2-Chloronaphthalene	10	ug/L
2-Chlorophenol	10	ug/L
2-Hexanone; Methyl butyl ketone	5	ug/L
2-Methylnaphthalene	10	ug/L
2-Naphthylamine	10	ug/L

3,3'-Dichlorobenzidine	20	ug/L
3,3'-Dimethylbenzidine	10	ug/L
3-Methylcholanthrene	10	ug/L
4,4'-DDD	<0.00083	ug/L
4,4'-DDE	<0.00059	ug/L
4,4'-DDT	<0.00059	ug/L
4,6-Dinitro-o-cresol; 4,6-Dinitro-2-methylphenol	<0.12	ug/L
4-Aminobiphenyl	20	ug/L
4-Bromophenyl phenyl ether	10	ug/L
4-Chlorophenyl phenyl ether	10	ug/L
4-Methyl-2-pentanone; Methyl isobutyl ketone	5	ug/L
5-Nitro-o-toluidine	10	ug/L
7,12-Dimethylbenz[a]anthracene	<0.0044	ug/L

Acenaphthene	10	ug/L
Acenaphthylene	10	ug/L
Acetone	10	ug/L
Acetonitrile; Methyl cyanide	No RL	
Acetophenone	10	ug/L
Acrolein	<3	ug/L
Acrylonitrile	<0.059	ug/L
Aldrin	<0.00013	ug/L
Allyl chloride	No RL	
alpha, alpha-Dimethylphenethylamine	No RL	
alpha-BHC	<0.0039	ug/L
Alpha-Terpineol	<33	ug/L
Ammonia Nitrogen	2,000	ug/L
Anthracene	10	ug/L

Benzene	0.5	ug/L
Benzo[a]anthracene; Benanthracene	<0.029	ug/L
Benzo[a]pyrene	<0.0044	ug/L
Benzo[b]fluoranthene	<0.0044	ug/L
Benzo[ghi]perylene	<4	ug/L
Benzoic Acid	<120	ug/L
Benzo[k]fluoranthene	<0.0044	ug/L
Benzyl alcohol	24	ug/L
beta-BHC	<0.014	ug/L
Bicarbonate (as CaCO <sub>3</sub> )	No RL	
Bis(2-chloro-1-methylethyl) ether; 2,2'-Dichlorodiisopropyl ether; DCIP	No RL	
Bis(2-chloroethoxy)methane	10	ug/L
Bis(2-chloroethyl)ether; Dichloroethyl ether	10	ug/L

Bis(2-ethylhexyl) phthalate	3	ug/L
Bromide	300	ug/L
Bromochloromethane; Chlorobromomethane	0.5	ug/L
Bromodichloromethane; Dibromochloromethane	<0.41	ug/L
Bromoform; Tribromomethane	1	ug/L
Butyl benzyl phthalate; Benzyl butyl phthalate	10	ug/L
Carbon dioxide	50	ug/L
Carbon disulfide	5	ug/L
Carbon tetrachloride	<0.25	ug/L
Chlordane	<0.00057	ug/L
Chloride	1,000	ug/L
Chlorobenzene	0.5	ug/L
Chloroethane; Ethyl chloride	0.5	ug/L
Chloroform; Trichloromethane	0.5	ug/L

Chloromethane	0.5	ug/L
Chloroprene	200	ug/L
Chrysene	<0.0044	ug/L
cis-1,2-Dichloroethene	0.5	ug/L
Vinylidene chloride cis-1,2-Dichloroethylene; cis-1,2-Dichloroethene	0.5	ug/L
cis-1,3-Dichloropropene	0.5	ug/L
COD	4,000	ug/L
Cyanide	5	ug/L
delta-BHC	0.09	ug/L
Diallate	10	ug/L
Dibenz[a,h]anthracene	<0.0044	ug/L
Dibenzofuran	10	ug/L
Dibromochloromethane; Chlorodibromomethane	<0.41	ug/L
Dichlorodifluoromethane; CFC 12	<0.19	ug/L
Dieldrin	<0.00014	ug/L

Diethyl phthalate	10	ug/L
Dimethoate	20	ug/L
Dimethyl phthalate	10	ug/L
Di-n-butyl phthalate	10	ug/L
Di-n-octyl phthalate	10	ug/L
Dinoseb; DNBP; 2-sec-Butyl-4,6-dinitrophenol	<7	ug/L
Diphenylamine	10	ug/L
Disulfoton	<0.05	ug/L
Endosulfan I; alpha-Endosulfan	0.14	ug/L
Endosulfan II	0.04	ug/L
Endosulfan sulfate	0.66	ug/L
Endrin	<0.036	ug/L
Endrin aldehyde	0.23	ug/L

Ethyl methacrylate	No RL	
Ethyl methanesulfonate	20	ug/L
Ethylbenzene	0.5	ug/L
Famphur	No RL	
Fluoranthene	10	ug/L
Fluorene	10	ug/L
Fluoride	200	ug/L
gamma-BHC; Lindane	<0.019	ug/L
Heptachlor	<0.00021	ug/L
Hexachlorobenzene	10	ug/L
Hexachlorobutadiene	0.5	ug/L
Hexachlorocyclopentadiene	50	ug/L
Hexachloroethane	10	ug/L

Hexachloropropene	10	ug/L
Indeno(1,2,3-cd)pyrene	<0.0044	ug/L
Isobutyl alcohol	No RL	
Isodrin	20	ug/L
Isophorone	10	ug/L
Isosafrole	10	ug/L
Kepone	<0.0022	ug/L
m-Cresol; 3-Methylphenol	No RL	
m-Dichlorobenzene; 1,3-Dichlorobenzene	0.5	ug/L
m-Dinitrobenzene	20	ug/L
Methacrylonitrile	35	ug/L
Methapyrilene	No RL	
Methoxychlor	<30	ug/L

Methyl bromide; Bromomethane	0.5	ug/L
Methyl chloride; Chloromethane	0.5	ug/L
Methyl ethyl ketone; MEK; 2- Butanone	3	ug/L
Methyl iodide; Iodomethane	5	ug/L
Methyl methacrylate	No RL	
Methyl methanesulfonate	10	ug/L
Methyl parathion; Parathion methyl	0.2	ug/L
Methylene bromide; Dibromomethane	0.5	ug/L
Methylene chloride; Dichloromethane	3	ug/L
m-Nitroaniline; 3-Nitroaniline	No RL	
Naphthalene	<0.29	ug/L
Nitrate Nitrogen	No RL	
Nitrobenzene	10	ug/L

N-Nitrosodiethylamine	No RL	
N-Nitrosodimethylamine	<0.00069	ug/L
N-Nitrosodi-n-butylamine	No RL	
N-Nitrosodiphenylamine	<5	ug/L
N-Nitrosodipropylamine; N-Nitroso-N-dipropylamine; Di-n-propylnitrosamine	No RL	
N-Nitrosomethylethalamine	No RL	
N-Nitrosopiperidine	No RL	
N-Nitrosopyrrolidine	No RL	
O,O,O-Triethyl phosphorothioate	No RL	
o-Cresol; 2-Methylphenol	10	ug/L
o-Dichlorobenzene; 1,2-Dichlorobenzene	10	ug/L
o-Nitroaniline; 2-Nitroaniline	50	ug/L
o-Nitrophenol; 2-Nitrophenol	10	ug/L

o-Toluidine	20	ug/L
p-(Dimethylamino)azobenzene	10	ug/L
Parathion	No RL	
p-Chloroaniline	10	ug/L
p-Chloro-m-cresol; 4-Chloro-3-methylphenol	20	ug/L
p-Cresol; 4-Methylphenol	<25	ug/L
p-Dichlorobenzene; 1,4-Dichlorobenzene	<0.19	ug/L
Pentachlorobenzene	10	ug/L
Pentachloronitrobenzene	20	ug/L
Pentachlorophenol	<0.28	ug/L
Phenacetin	20	ug/L
Phenanthrene	10	ug/L
Phenol	10	ug/L

Phorate	0.2	ug/L
p-Nitroaniline; 4-Nitroaniline	10	ug/L
p-Nitrophenol; 4-Nitrophenol	50	ug/L
Polychlorinated biphenyls; PCBs	<0.00017	ug/L
p-Phenylenediamine	No RL	
Pronamide	10	ug/L
Propionitrile; Ethyl cyanide	No RL	
Pyrene	10	ug/L
Safrole	10	ug/L
Silvex; 2,4,5-TP	5	ug/L
Styrene	0.5	ug/L
Sulfate	1,000	ug/L
Sulfide	100	ug/L

sym-Trinitrobenzene	10	ug/L
TDS	<450	ug/L
Tetrachloroethene	0.5	ug/L
Tetrachloroethylene; Tetrachloroethene; Perchloroethylene	0.5	ug/L
O,O-Diethyl O-2-pyrazinyl phosphorothioate; Thionazin	10	ug/L
Toluene	0.5	ug/L
Total Alkalinity	2,000	ug/L
Total Antimony	0.5	ug/L
Total Arsenic	1	ug/L
Total Barium	0.5	ug/L
Total Beryllium	0.25	ug/L
Total Boron	10	ug/L
Total Cadmium	0.2	ug/L
Total Calcium	10,000	ug/L
Total Chromium	0.5	ug/L
Total Copper	0.5	ug/L
Total Iron	1,000	ug/L
Total Lead	0.25	ug/L
Total Magnesium	100	ug/L
Total Manganese	10	ug/L
Total Mercury	0.04	ug/L
Total Nickel	1	ug/L
Total Organic Carbon	1,000	ug/L
Total Potassium	500	ug/L
Total Selenium	1	ug/L
Total Silver	0.2	ug/L

Total Sodium	600	ug/L
Total Suspended Solids	100,000	ug/L
Total Thallium	0.25	ug/L
Total Tin	5	ug/L
Total Vanadium	0.5	ug/L
Total Zinc	1	ug/L
Toxaphene	<0.0002	ug/L
trans-1,2-Dichloroethylene; trans-1,2-Dichloroethene	0.5	ug/L
trans-1,3-Dichloropropene	0.5	ug/L
trans-1,4-Dichloro-2-butene	5	ug/L
Trichloroethene	0.5	ug/L
Trichloroethylene; Trichloroethene	0.5	ug/L
Trichlorofluoromethane; CFC- 11	5	ug/L
Vinyl acetate	50	ug/L
Vinyl chloride; Chloroethene	<0.022	ug/L

Xylene (total)	5	ug/L
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# **EXHIBIT 3**

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**From:** Newman, Jenny@Waterboards <Jenny.Newman@waterboards.ca.gov>  
**Sent:** Friday, February 20, 2026 6:07 PM  
**To:** Sarah Phillips; Vitale, Pavlova@Waterboards; Landon, Scott@Waterboards; Hawe, Catherine@Waterboards; Colby, Russ@Waterboards  
**Cc:** Stephen P. Smith; Jacqueline O. Eisermann; Allyn L. Stern  
**Subject:** RE: CCL - Amended IO and Reporting Limits

Hi Sarah,

Thank you for your message. The Los Angeles Water Board is not going to revise the amended order to provide any accommodation or additional time to comply. The reporting limits are in effect as of the date of the issuance of the order.

Please let us know if you have any questions.

Thanks,  
Jenny

Jenny Newman  
Assistant Executive Officer  
Los Angeles Regional Water Quality Control Board  
[Jenny.newman@waterboards.ca.gov](mailto:Jenny.newman@waterboards.ca.gov)  
(213) 576-6609

---

**From:** Sarah Phillips <Sarah.Phillips@WasteConnections.com>  
**Sent:** Monday, February 16, 2026 5:59 PM  
**To:** Vitale, Pavlova@Waterboards <Pavlova.Vitale@waterboards.ca.gov>; Landon, Scott@Waterboards <Scott.Landon@Waterboards.ca.gov>; Hawe, Catherine@Waterboards <Catherine.Hawe@Waterboards.ca.gov>; Newman, Jenny@Waterboards <Jenny.Newman@waterboards.ca.gov>; Colby, Russ@Waterboards <Russ.Colby@waterboards.ca.gov>  
**Cc:** spsmith@bdlaw.com; Jacqueline O. Eisermann <jeisermann@bdlaw.com>; astern@bdlaw.com  
**Subject:** CCL - Amended IO and Reporting Limits

**Caution:** External Email. Use caution when clicking links or opening attachments. When in doubt, contact DIT or use the Phish Alert Button.

Good afternoon –

Thank you again for speaking with us on Friday about the Amended Investigative Order (IO). As noted in our February 15 email updating on the recent seep, based on initial discussions with our laboratory, the equipment currently tests to some, but not all, of the Reporting Limits (RLs) listed in Appendix I. The lab

is evaluating whether and by when it can recalibrate and adjust equipment to do so, and is preparing a report detailing its findings to us.

CCL is working quickly to evaluate all options, but this will not be resolved in time for the site's imminent sampling needs. A rain event last week immediately following issuance of the Amended IO required sampling, as did the seep event. Heavy rains that began last night have also required sampling of the basins, and groundwater EMP sampling is also scheduled for February 18. As discussed on our call, we are communicating these concerns in advance and seeking reasonable accommodations.

Thank you.

Sarah

**Sarah Phillips**

248.930.2779

Corporate Compliance Manager

**Waste Connections**



# **EXHIBIT 4**

---

**From:** Matt Breuer <Matthew.Breuer@WasteConnections.com>  
**Sent:** Thursday, February 12, 2026 9:02 PM  
**To:** Vitale, Pavlova@Waterboards  
**Cc:** Sarah Phillips; Landon, Scott@Waterboards; Stephen P. Smith; Allyn L. Stern; Jacqueline O. Eisermann  
**Subject:** Amended Investigative Order Meeting Request

[EXTERNAL SENDER: Use caution with links/attachments]

---

Good evening Pavlova,

We are in receipt of the Regional Board's February 11<sup>th</sup> amended Investigative Order and are reaching out to request a meeting to hopefully clarify several requirements in anticipation for rain on Monday. Are you available tomorrow, February 13<sup>th</sup>, during any of the following times?

- 10:00 AM to 11:00 AM
- 12:00 PM to 1:00 PM

We are happy to send a proposed agenda in advance of the meeting if helpful.

Thank you,

**Matt Breuer, PE**  
Region Environmental Manager  
Waste Connections - Western Region  
425-414-2903 (mobile)

# **EXHIBIT 5**

---

**From:** Matt Breuer <Matthew.Breuer@WasteConnections.com>  
**Sent:** Friday, February 13, 2026 8:21 AM  
**To:** Vitale, Pavlova@Waterboards  
**Cc:** Sarah Phillips; Landon, Scott@Waterboards; Stephen P. Smith; Allyn L. Stern; Jacqueline O. Eisermann  
**Subject:** Re: Amended Investigative Order Meeting Request

[EXTERNAL SENDER: Use caution with links/attachments]

---

Thank you, Pavlova. I just sent the invite for 12pm. Talk soon.

Best,

**Matt Breuer, PE**  
Region Environmental Manager  
Waste Connections - Western Region  
425-414-2903 (mobile)

---

**From:** Vitale, Pavlova@Waterboards <Pavlova.Vitale@waterboards.ca.gov>  
**Sent:** Friday, February 13, 2026 7:16 AM  
**To:** Matt Breuer <Matthew.Breuer@WasteConnections.com>  
**Cc:** Sarah Phillips <Sarah.Phillips@WasteConnections.com>; Landon, Scott@Waterboards <Scott.Landon@Waterboards.ca.gov>; Stephen P. Smith <spsmith@bdlaw.com>; Allyn L. Stern <astern@bdlaw.com>; Jacqueline O. Eisermann <jeisermann@bdlaw.com>  
**Subject:** RE: Amended Investigative Order Meeting Request

Hi Matt, yes both times work fine for me. Please send me a teams meeting invite. thank you.



**Pavlova Vitale**  
Senior Environmental Scientist

R4 LOS ANGELES  
R4 Compliance & Enforcement | R4 Enforcement II

Email: Pavlova.Vitale@waterboards.ca.gov  
Phone: +1 (213) 576-6751

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Website: [www.waterboards.ca.gov](http://www.waterboards.ca.gov)

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---

**From:** Matt Breuer <Matthew.Breuer@WasteConnections.com>  
**Sent:** Thursday, February 12, 2026 8:02 PM  
**To:** Vitale, Pavlova@Waterboards <Pavlova.Vitale@waterboards.ca.gov>  
**Cc:** Sarah Phillips <Sarah.Phillips@WasteConnections.com>; Landon, Scott@Waterboards <Scott.Landon@Waterboards.ca.gov>; spsmith@bdlaw.com; astern@bdlaw.com; Jacqueline O. Eisermann

<jeisermann@bdlaw.com>

**Subject:** Amended Investigative Order Meeting Request

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Good evening Pavlova,

We are in receipt of the Regional Board's February 11<sup>th</sup> amended Investigative Order and are reaching out to request a meeting to hopefully clarify several requirements in anticipation for rain on Monday. Are you available tomorrow, February 13<sup>th</sup>, during any of the following times?

- 10:00 AM to 11:00 AM
- 12:00 PM to 1:00 PM

We are happy to send a proposed agenda in advance of the meeting if helpful.

Thank you,

**Matt Breuer, PE**

Region Environmental Manager

Waste Connections - Western Region

425-414-2903 (mobile)

# **EXHIBIT 6**

---

**From:** Matt Breuer <Matthew.Breuer@WasteConnections.com>  
**Sent:** Friday, February 13, 2026 11:44 AM  
**To:** Vitale, Pavlova@Waterboards  
**Cc:** Sarah Phillips; Landon, Scott@Waterboards; Stephen P. Smith; Allyn L. Stern; Jacqueline O. Eisermann  
**Subject:** Re: Amended Investigative Order Meeting Request

[EXTERNAL SENDER: Use caution with links/attachments]

---

Good morning Pavlova,

Current attendees and titles for our call are as follows:

Matt Breuer (Region Environmental Manager), Sarah Phillips (Corporate Compliance Manager), Stephen Smith (Of Counsel at Beveridge & Diamond), and Jacqueline Eisermann (Associate at Beveridge & Diamond).

As requested, please see below a proposed agenda for our call today at 12PM PT.

- I. Introductions
- II. Amended Investigative Order Compliance Deadlines
- III. 30-Day Storm Sampling & Reports
- IV. Sample Volume, Dilution, Reporting Limits, and Laboratory Analysis
- V. Other Timing Considerations Consistent with IGP

Thank you,

**Matt Breuer, PE**  
Region Environmental Manager  
Waste Connections - Western Region  
425-414-2903 (mobile)

---

**From:** Vitale, Pavlova@Waterboards <Pavlova.Vitale@waterboards.ca.gov>  
**Sent:** Friday, February 13, 2026 7:53 AM  
**To:** Matt Breuer <Matthew.Breuer@WasteConnections.com>  
**Cc:** Sarah Phillips <Sarah.Phillips@WasteConnections.com>; Landon, Scott@Waterboards <Scott.Landon@Waterboards.ca.gov>; Stephen P. Smith <spsmith@bdlaw.com>; Allyn L. Stern <astern@bdlaw.com>; Jacqueline O. Eisermann <jeisermann@bdlaw.com>  
**Subject:** RE: Amended Investigative Order Meeting Request

Matt, by 11 am today, would you please provide me with: an agenda for the meeting today for us to review and a list of the attendees with their titles and roles and the topics you want to discuss and any specific questions. Thank you.



**Pavlova Vitale**  
Senior Environmental Scientist

R4 LOS ANGELES  
R4 Compliance & Enforcement | R4 Enforcement II

Email: [Pavlova.Vitale@waterboards.ca.gov](mailto:Pavlova.Vitale@waterboards.ca.gov)  
Phone: +1 (213) 576-6751

Regional Water Quality Control Boards  
320 West 4th Street, Suite 200, Los Angeles CA 90013  
Website: [www.waterboards.ca.gov](http://www.waterboards.ca.gov)

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**Sent:** Friday, February 13, 2026 7:21 AM  
**To:** Vitale, Pavlova@Waterboards <[Pavlova.Vitale@waterboards.ca.gov](mailto:Pavlova.Vitale@waterboards.ca.gov)>  
**Cc:** Sarah Phillips <[Sarah.Phillips@WasteConnections.com](mailto:Sarah.Phillips@WasteConnections.com)>; Landon, Scott@Waterboards <[Scott.Landon@Waterboards.ca.gov](mailto:Scott.Landon@Waterboards.ca.gov)>; spsmith@bdlaw.com; astern@bdlaw.com; Jacqueline O. Eisermann <[jeisermann@bdlaw.com](mailto:jeisermann@bdlaw.com)>  
**Subject:** Re: Amended Investigative Order Meeting Request

Thank you, Pavlova. I just sent the invite for 12pm. Talk soon.

Best,

**Matt Breuer, PE**  
Region Environmental Manager  
Waste Connections - Western Region  
425-414-2903 (mobile)

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**To:** Matt Breuer <[Matthew.Breuer@WasteConnections.com](mailto:Matthew.Breuer@WasteConnections.com)>  
**Cc:** Sarah Phillips <[Sarah.Phillips@WasteConnections.com](mailto:Sarah.Phillips@WasteConnections.com)>; Landon, Scott@Waterboards <[Scott.Landon@Waterboards.ca.gov](mailto:Scott.Landon@Waterboards.ca.gov)>; Stephen P. Smith <[spsmith@bdlaw.com](mailto:spsmith@bdlaw.com)>; Allyn L. Stern <[astern@bdlaw.com](mailto:astern@bdlaw.com)>; Jacqueline O. Eisermann <[jeisermann@bdlaw.com](mailto:jeisermann@bdlaw.com)>  
**Subject:** RE: Amended Investigative Order Meeting Request

Hi Matt, yes both times work fine for me. Please send me a teams meeting invite. thank you.



**Pavlova Vitale**  
Senior Environmental Scientist

R4 LOS ANGELES  
R4 Compliance & Enforcement | R4 Enforcement II

Email: [Pavlova.Vitale@waterboards.ca.gov](mailto:Pavlova.Vitale@waterboards.ca.gov)  
Phone: +1 (213) 576-6751

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**From:** Matt Breuer <[Matthew.Breuer@WasteConnections.com](mailto:Matthew.Breuer@WasteConnections.com)>  
**Sent:** Thursday, February 12, 2026 8:02 PM  
**To:** Vitale, Pavlova@Waterboards <[Pavlova.Vitale@waterboards.ca.gov](mailto:Pavlova.Vitale@waterboards.ca.gov)>  
**Cc:** Sarah Phillips <[Sarah.Phillips@WasteConnections.com](mailto:Sarah.Phillips@WasteConnections.com)>; Landon, Scott@Waterboards <[Scott.Landon@Waterboards.ca.gov](mailto:Scott.Landon@Waterboards.ca.gov)>; [spsmith@bdlaw.com](mailto:spsmith@bdlaw.com); [astern@bdlaw.com](mailto:astern@bdlaw.com); Jacqueline O. Eisermann <[jeisermann@bdlaw.com](mailto:jeisermann@bdlaw.com)>  
**Subject:** Amended Investigative Order Meeting Request

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Good evening Pavlova,

We are in receipt of the Regional Board's February 11<sup>th</sup> amended Investigative Order and are reaching out to request a meeting to hopefully clarify several requirements in anticipation for rain on Monday. Are you available tomorrow, February 13<sup>th</sup>, during any of the following times?

- 10:00 AM to 11:00 AM
- 12:00 PM to 1:00 PM

We are happy to send a proposed agenda in advance of the meeting if helpful.

Thank you,

**Matt Breuer, PE**  
Region Environmental Manager  
Waste Connections - Western Region  
425-414-2903 (mobile)

# **EXHIBIT 7**

---

**From:** Sarah Phillips <Sarah.Phillips@WasteConnections.com>  
**Sent:** Sunday, February 15, 2026 9:59 PM  
**To:** Vitale, Pavlova@Waterboards; Casas, Enrique@Waterboards  
**Cc:** Matt Breuer; 'emorofuji@ph.lacounty.gov'  
**Subject:** Re: Seep in the South Basin  
**Attachments:** 553108\_RPTS.pdf; 553152\_RPTS.pdf

Pavlova,

We are emailing with updates about the seep identified on Thursday, February 12, 2026, at the toe of the western slope. As of February 13, 2026, the seep has stopped and Chiquita has fully cleaned the stormwater channel and south basin. Chiquita installed additional infrastructure to prevent leachate and stormwater from commingling, is actively monitoring the area of the seep, and is prepared to immediately remove additional liquids, should the seep reappear during the upcoming rain events. Chiquita is providing this notification in the spirit of transparency and coordination to ensure that the Water Board is kept abreast of our actions to mitigate any potential impacts from the seep.

On February 12, 2026, a small visible sheen of dark liquid, approximately 10 feet by 15 feet in area, was observed in Stage 1 of the South Sedimentation Basin. Chiquita promptly deployed a vacuum truck and removed the leachate along with additional stormwater present within the vicinity of the inlet. We estimate 20-40 gallons of leachate entered Stage 1 of the basin. In total, approximately 3,360 gallons of liquid were removed, consisting primarily of stormwater in addition to the estimated volume of leachate. As part of its cleanup efforts, Chiquita also pressure-washed the stormwater channel and culvert leading to the South Sedimentation Basin and removed the wash water by vacuum truck.

Upon discovery of the seep, and as previously reported, Chiquita immediately blocked the inlet to Stage 1 of the South Sedimentation Basin and placed soil check dams within the stormwater channel to stop the seep from traveling to the basin. To contain the seep, Chiquita dug a containment area at the source of the seep at the western toe to collect the liquid. This containment area is approximately 40 feet in length and has an estimated capacity of approximately 300 gallons. Since February 13, 2026, no active flow has been observed, and no liquid has accumulated in the containment area. Chiquita is monitoring the containment area and is prepared to remove liquids using a vacuum truck in the event they reappear during the upcoming, predicted rain event. Further, rock has been added to the access road to ensure reliable access during wet conditions caused by the predicted rain event.

On February 12, 2026, during the seep event, we collected a sample of the seep from the western inlet to Stage 1 of the South Sedimentation Basin. The final report for this sample is attached. Results show that the seep was non-detect for benzene.

Following cleanup of the basin, as described above, we took three samples from the basin. One sample was taken from Stage 1 of the basin next to the western inlet. Samples were also taken from further south and along the western portion of Stage 1 of the basin (near where the north pond overflows into the south pond), and from Stage 2 of the south basin near the stand pipes. The results of this sampling are attached for your review.

While the report is preliminary, the data for the methods presented are QC'ed and will not change with the final report, which will include additional methods that take longer to run. Analytical results are consistent with stormwater and confirm visual observations that all leachate was removed from the south basin.

The laboratory is still reviewing the Amended Investigative Order and its list of reporting limits (“RLs”). We understand that some of the RLs in the attached analytical results do not meet the RLs set this week by the Amended IO. While the lab may be able to meet such RLs for different types of media, it cannot at this time for stormwater. The lab is working to understand if it can recalibrate equipment to meet these RLs moving forward. We are also reaching out to other labs in the area to determine whether they can meet these RL requirements for stormwater samples. The lab was able to run these stormwater samples without dilution, but we understand that may be a concern for labs depending on the amount of particles suspended in the stormwater.

We believe that the basin sampling results confirm that we successfully removed all leachate from the south basin. Although the results indicate that we may remove the plugs in the south basin standpipes, we have not yet done so. Given the estimated rainfall, it is likely that with the plugs in place, the water in the basin will overtop the emergency spillway as designed and described in the facility’s SWPPP. If that occurs, we will sample the discharge, consistent with our obligations under the IO.

As stated above, the area of the seep will remain under constant observation throughout the predicted rain event to ensure prompt removal of leachate should the seep reappear. We will continue to keep you apprised of any major developments.

Thank you,

Sarah

**Sarah Phillips**  
248.930.2779



---

**From:** Sarah Phillips <Sarah.Phillips@WasteConnections.com>  
**Sent:** Thursday, February 12, 2026 9:08 PM  
**To:** Vitale, Pavlova@Waterboards <Pavlova.Vitale@waterboards.ca.gov>; Casas, Enrique@Waterboards <Enrique.Casas@waterboards.ca.gov>  
**Cc:** Matt Breuer <Matthew.Breuer@WasteConnections.com>; 'emorofuji@ph.lacounty.gov' <emorofuji@ph.lacounty.gov>  
**Subject:** Re: Seep in the South Basin

Pavlova – We are actively investigating this event, including calculating the total estimated volume of liquid that reached the basin. However, we think the total volume was minimal; the trickle was so low that it was difficult to even collect a sample. We will follow up with the estimate volume as soon as possible. Thank you for your continued patience.

**Sarah Phillips**  
248.930.2779



---

**From:** Vitale, Pavlova@Waterboards <Pavlova.Vitale@waterboards.ca.gov>  
**Sent:** Thursday, February 12, 2026 8:38 PM  
**To:** Sarah Phillips <Sarah.Phillips@WasteConnections.com>; Casas, Enrique@Waterboards <Enrique.Casas@waterboards.ca.gov>  
**Cc:** Matt Breuer <Matthew.Breuer@WasteConnections.com>; 'emorofuji@ph.lacounty.gov' <emorofuji@ph.lacounty.gov>  
**Subject:** Re: Seep in the South Basin

How much of the deep entered the stage 1 of the south basin?

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**From:** Sarah Phillips <Sarah.Phillips@WasteConnections.com>  
**Sent:** Thursday, February 12, 2026 7:36:37 PM  
**To:** Casas, Enrique@Waterboards <Enrique.Casas@waterboards.ca.gov>; Vitale, Pavlova@Waterboards <Pavlova.Vitale@waterboards.ca.gov>  
**Cc:** Matt Breuer <Matthew.Breuer@WasteConnections.com>; 'emorofuji@ph.lacounty.gov' <emorofuji@ph.lacounty.gov>  
**Subject:** Seep in the South Basin

**Caution:** External Email. Use caution when clicking links or opening attachments. When in doubt, contact DIT or use the Phish Alert Button.

Good evening,

On February 12, 2026, at approximately 8:00 a.m., Chiquita discovered that a seep coming from the west side of the landfill had reached the stormwater channel and entered Stage 1 of the South Sedimentation Basin. Stage 2 of the basin was slowly discharging when liquid from the seep entered Stage 1 of the basin, but there is no indication that the seep liquid—which was observed as a light trickle—traveled into Stage 2. Upon discovery, Chiquita placed a dam to prevent further seep liquid from entering the stormwater channel, thereby containing the seep at its source. Chiquita also placed a dam at the inlet where liquid was entering Stage 1 of the basin to prevent additional liquid from entering the basin. As part of the cleanup efforts, Chiquita dispatched a vacuum truck to the South Sedimentation Basin to remove all visible indications of the seep from the Stage 1 basin. Chiquita has also pressure-washed the stormwater channel while applying vacuum to ensure the proper collection of all wash water. This event and the cleanup are ongoing and additional details regarding the seep will be provided in the 7-day report.

**Sarah Phillips**

248.930.2779

Corporate Compliance Manager

## Waste Connections



## Enthalpy Analytical Report

<b>Lab #:</b> 553108 <b>Client:</b> CTEH Chiquita Canyon Landfill - PROJ-037507	<b>Project#:</b> WC CHIQUITACANYON LF <b>Location:</b> Waste Connections Chiquita Canyon ...
<b>Field ID:</b> CACA260212Z-WESTERN-INLET <b>Lab ID:</b> 553108-001 <b>Matrix:</b> Water <b>DF:</b> 50.00	<b>Batch#:</b> 395301 <b>Sampled:</b> 02/12/26 <b>Received:</b> 02/13/26 <b>Analyzed:</b> 02/13/26
	<b>Prep:</b> EPA 5030B <b>Analysis:</b> EPA 8260B <b>Analyst:</b> LYZ

553108-001 Analyte	Result	RL	MDL	Units
Vinyl Chloride	ND	0.3	0.007	mg/L
1,1-Dichloroethene	ND	0.3	0.006	mg/L
<b>2-Butanone</b>	<b>0.3 J</b>	<b>5.0</b>	<b>0.05</b>	<b>mg/L</b>
Chloroform	ND	0.3	0.003	mg/L
Carbon Tetrachloride	ND	0.3	0.003	mg/L
1,2-Dichloroethane	ND	0.3	0.005	mg/L
Benzene	ND	0.3	0.004	mg/L
Trichloroethene	ND	0.3	0.002	mg/L
Tetrachloroethene	ND	0.3	0.004	mg/L
Chlorobenzene	ND	0.3	0.002	mg/L
1,4-Dichlorobenzene	ND	0.3	0.004	mg/L

553108-001 Surrogate	%REC	Limits
Dibromofluoromethane	101	70-130
1,2-Dichloroethane-d4	102	70-130
Toluene-d8	93	70-130
Bromofluorobenzene	104	70-130

Legend  
**J:** Estimated value  
**MDL:** Method Detection Limit  
**ND:** Not Detected at or above MDL  
**RL:** Reporting Limit

DRAFT

## Enthalpy Analytical Report

<b>Lab #:</b> 553108 <b>Client:</b> CTEH Chiquita Canyon Landfill - PROJ-037507	<b>Project#:</b> WC CHIQUITACANYON LF <b>Location:</b> Waste Connections Chiquita Canyon ...
<b>Field ID:</b> CACA260212Z-WESTERN-INLET <b>Lab ID:</b> 553108-001 <b>Matrix:</b> Water <b>DF:</b> 1.923	<b>Batch#:</b> 395350 <b>Sampled:</b> 02/12/26 <b>Received:</b> 02/13/26 <b>Prepared:</b> 02/13/26
	<b>Analyzed:</b> 02/14/26 <b>Prep:</b> EPA 3510C <b>Analysis:</b> EPA 8270E <b>Analyst:</b> TJW

553108-001 Analyte	Result	RL	MDL	Units
<b>Pyridine</b>	<b>0.011 J</b>	0.019	0.0054	mg/L
<b>2-Methylphenol</b>	<b>0.017 J</b>	0.019	0.0062	mg/L
<b>3,4-Methylphenol</b>	<b>1.2 E</b>	0.019	0.0058	mg/L
Hexachloroethane	ND	0.019	0.0058	mg/L
Nitrobenzene	ND	0.048	0.016	mg/L
Hexachlorobutadiene	ND	0.019	0.0043	mg/L
2,4,6-Trichlorophenol	ND	0.019	0.0078	mg/L
2,4,5-Trichlorophenol	ND	0.019	0.0071	mg/L
2,4-Dinitrotoluene	ND	0.019	0.0082	mg/L
Hexachlorobenzene	ND	0.019	0.0058	mg/L
Pentachlorophenol	ND	0.048	0.011	mg/L

553108-001 Surrogate	%REC	Limits
2-Fluorophenol	52	15-120
Phenol-d6	93	15-120
2,4,6-Tribromophenol	78	15-140
Nitrobenzene-d5	125 *	15-123
2-Fluorobiphenyl	54	15-120
Terphenyl-d14	77	15-120

Legend

\*: Value is outside QC limits

E: Response exceeds instrument's linear range

J: Estimated value

MDL: Method Detection Limit

ND: Not Detected at or above MDL

RL: Reporting Limit

DRAFT

### California Title 22 Metals

**Lab #:** 553108

**Project#:** WC CHIQUITACANYON LF

**Client:** CTEH Chiquita Canyon Landfill - PROJ-037507

**Location:** Waste Connections Chiquita Canyon  
 ...

**Field ID:** CACA260212Z-WESTERN-INLET

**Sampled:** 02/12/26

**Analyzed:** 02/13/26

**Lab ID:** 553108-001

**Received:** 02/13/26

**Matrix:** Water

**Prepared:** 02/13/26

553108-001 Analyte	Result	RL	MDL	Units	DF	Batch#	Prep	Analysis	Analyst
Antimony	ND	0.30	0.078	mg/L	10.00	395311	EPA 3015A	EPA 6010B	SBW
<b>Arsenic</b>	<b>0.082 J</b>	0.10	0.064	mg/L	10.00	395311	EPA 3015A	EPA 6010B	SBW
<b>Barium</b>	<b>0.98</b>	0.10	0.0044	mg/L	10.00	395311	EPA 3015A	EPA 6010B	SBW
Beryllium	ND	0.050	0.0034	mg/L	10.00	395311	EPA 3015A	EPA 6010B	SBW
Cadmium	ND	0.050	0.0021	mg/L	10.00	395311	EPA 3015A	EPA 6010B	SBW
<b>Chromium</b>	<b>0.078 J</b>	0.10	0.0085	mg/L	10.00	395311	EPA 3015A	EPA 6010B	SBW
<b>Cobalt</b>	<b>0.014 J</b>	0.050	0.0034	mg/L	10.00	395311	EPA 3015A	EPA 6010B	SBW
Copper	ND	0.10	0.021	mg/L	10.00	395311	EPA 3015A	EPA 6010B	SBW
Lead	ND	0.10	0.022	mg/L	10.00	395311	EPA 3015A	EPA 6010B	SBW
Mercury	ND	0.080	0.018	mg/L	200.0	395295	EPA 7470A	EPA 7470A	MLL
Molybdenum	ND	0.10	0.023	mg/L	10.00	395311	EPA 3015A	EPA 6010B	SBW
<b>Nickel</b>	<b>0.016 J</b>	0.10	0.012	mg/L	10.00	395311	EPA 3015A	EPA 6010B	SBW
Selenium	ND	0.30	0.051	mg/L	10.00	395311	EPA 3015A	EPA 6010B	SBW
<b>Silver</b>	<b>0.013 J</b>	0.050	0.0070	mg/L	10.00	395311	EPA 3015A	EPA 6010B	SBW
Thallium	ND	0.30	0.036	mg/L	10.00	395311	EPA 3015A	EPA 6010B	SBW
<b>Vanadium</b>	<b>0.048 J</b>	0.10	0.013	mg/L	10.00	395311	EPA 3015A	EPA 6010B	SBW
<b>Zinc</b>	<b>0.13 J</b>	0.50	0.021	mg/L	10.00	395311	EPA 3015A	EPA 6010B	SBW

## Legend

**J:** Estimated value

**MDL:** Method Detection Limit

**ND:** Not Detected at or above MDL

**RL:** Reporting Limit

### Closed-Cup Ignitability (Flashpoint)

<b>Lab #:</b> 553108 <b>Client:</b> CTEH Chiquita Canyon Landfill - PROJ-037507	<b>Project#:</b> WC CHIQUITACANYON LF <b>Location:</b> Waste Connections Chiquita Canyon ...
<b>Field ID:</b> CACA260212Z-WESTERN-INLET <b>Lab ID:</b> 553108-001 <b>Matrix:</b> Water <b>DF:</b> 1.000	<b>Batch#:</b> 395374 <b>Sampled:</b> 02/12/26 <b>Received:</b> 02/13/26 <b>Analyzed:</b> 02/14/26
	<b>Prep:</b> <b>Analysis:</b> EPA 1010 <b>Analyst:</b> ARM

553108-001 Analyte	Result	Units
<b>Flash Point</b>	<b>&gt;203</b>	deg F

## pH of Aqueous and non-Aqueous Samples

<b>Lab #:</b> 553108 <b>Client:</b> CTEH Chiquita Canyon Landfill - PROJ-037507	<b>Project#:</b> WC CHIQUITACANYON LF <b>Location:</b> Waste Connections Chiquita Canyon ...
<b>Field ID:</b> CACA260212Z-WESTERN-INLET <b>Lab ID:</b> 553108-001 <b>Matrix:</b> Water <b>DF:</b> 1.000	<b>Batch#:</b> 395378 <b>Sampled:</b> 02/12/26 <b>Received:</b> 02/13/26 <b>Analyzed:</b> 02/14/26
	<b>Prep:</b> <b>Analysis:</b> EPA 9040B <b>Analyst:</b> ARM

553108-001 Analyte	Result	RL	Units	Qual
pH	6.93		SU	H
Temperature	20.40	1.00	deg C	H

Legend

**H:** Holding time was exceeded  
**RL:** Reporting Limit

## Purgeable Organics by GC/MS

<b>Lab #:</b> 553152	<b>Project#:</b> CCLF STORMWATER	
<b>Client:</b> Waste Connections	<b>Location:</b> Stormwater Outlet	
<b>Field ID:</b> SOUTH BASIN - NW CORNER	<b>Batch#:</b> 395299	<b>Prep:</b> EPA 5030B
<b>Lab ID:</b> 553152-001	<b>Sampled:</b> 02/13/26	<b>Analysis:</b> EPA 8260B
<b>Matrix:</b> Water	<b>Received:</b> 02/13/26	<b>Analyst:</b> LYZ
<b>DF:</b> 1.000	<b>Analyzed:</b> 02/13/26	

553152-001 Analyte	Result	RL	MDL	Units
Carbon Disulfide	ND	5.0	0.2	ug/L
Chloroprene	ND	200	0.4	ug/L
3-Chloropropene	ND	5.0	0.3	ug/L
Ethyl methacrylate	ND	50	2.1	ug/L
Ethanol	ND	500	110	ug/L
2-Hexanone	ND	5.0	1.1	ug/L
Isopropanol (IPA)	ND	200	52	ug/L
Methyl acrylonitrile	ND	35	3.7	ug/L
Vinyl Acetate	ND	50	15	ug/L
Acrolein	ND	200	2.7	ug/L
Acrylonitrile	ND	10	0.7	ug/L
Freon 12	ND	5.0	0.1	ug/L
Chloromethane	ND	5.0	0.2	ug/L
Vinyl Chloride	ND	5.0	0.1	ug/L
Bromomethane	ND	5.0	0.2	ug/L
Chloroethane	ND	5.0	0.1	ug/L
Trichlorofluoromethane	ND	5.0	0.06	ug/L
Iodomethane	ND	5.0		ug/L
Acetone	ND	100	5.0	ug/L
Freon 113	ND	5.0	0.1	ug/L
1,1-Dichloroethene	ND	5.0	0.08	ug/L
Methylene Chloride	ND	10	0.2	ug/L
MTBE	ND	5.0	0.09	ug/L
trans-1,2-Dichloroethene	ND	5.0	0.1	ug/L
1,1-Dichloroethane	ND	5.0	0.1	ug/L
<b>2-Butanone</b>	<b>2.0 J</b>	<b>10</b>	<b>1.5</b>	<b>ug/L</b>
cis-1,2-Dichloroethene	ND	5.0	0.09	ug/L
2,2-Dichloropropane	ND	5.0	0.1	ug/L
Chloroform	ND	5.0	0.08	ug/L
Bromochloromethane	ND	5.0	0.2	ug/L
1,1,1-Trichloroethane	ND	5.0	0.09	ug/L
1,1-Dichloropropene	ND	5.0	0.08	ug/L
Carbon Tetrachloride	ND	5.0	0.06	ug/L
1,2-Dichloroethane	ND	5.0	0.1	ug/L
<b>Benzene</b>	<b>0.1 J</b>	<b>1.0</b>	<b>0.1</b>	<b>ug/L</b>
Trichloroethene	ND	5.0	0.1	ug/L
1,2-Dichloropropane	ND	5.0	0.1	ug/L
Bromodichloromethane	ND	5.0	0.09	ug/L
Dibromomethane	ND	5.0	0.1	ug/L
4-Methyl-2-Pentanone	ND	5.0	1.0	ug/L
cis-1,3-Dichloropropene	ND	5.0	0.3	ug/L
Toluene	ND	5.0	0.2	ug/L
trans-1,3-Dichloropropene	ND	5.0	0.3	ug/L
1,1,2-Trichloroethane	ND	5.0	0.2	ug/L
1,3-Dichloropropane	ND	5.0	0.1	ug/L
Tetrachloroethene	ND	5.0	0.1	ug/L

## Purgeable Organics by GC/MS

**Lab #:** 553152

**Project#:** CCLF STORMWATER

**Client:** Waste Connections

**Location:** Stormwater Outlet

553152-001 Analyte	Result	RL	MDL	Units
Dibromochloromethane	ND	5.0	0.08	ug/L
1,2-Dibromoethane	ND	5.0	0.2	ug/L
Chlorobenzene	ND	5.0	0.1	ug/L
1,1,1,2-Tetrachloroethane	ND	5.0	0.08	ug/L
Ethylbenzene	ND	5.0	0.09	ug/L
m,p-Xylenes	ND	5.0	0.2	ug/L
o-Xylene	ND	5.0	0.1	ug/L
Styrene	ND	5.0	0.08	ug/L
Bromoform	ND	5.0	0.08	ug/L
Isopropylbenzene	ND	5.0	0.1	ug/L
1,1,2,2-Tetrachloroethane	ND	5.0	0.2	ug/L
1,2,3-Trichloropropane	ND	5.0	0.2	ug/L
Propylbenzene	ND	5.0	0.1	ug/L
Bromobenzene	ND	5.0	0.09	ug/L
1,3,5-Trimethylbenzene	ND	5.0	0.1	ug/L
2-Chlorotoluene	ND	5.0	0.1	ug/L
4-Chlorotoluene	ND	5.0	0.1	ug/L
tert-Butylbenzene	ND	5.0	0.1	ug/L
1,2,4-Trimethylbenzene	ND	5.0	0.1	ug/L
sec-Butylbenzene	ND	5.0	0.1	ug/L
para-Isopropyl Toluene	ND	5.0	0.1	ug/L
1,3-Dichlorobenzene	ND	5.0	0.1	ug/L
1,4-Dichlorobenzene	ND	5.0	0.2	ug/L
n-Butylbenzene	ND	5.0	0.1	ug/L
1,2-Dichlorobenzene	ND	5.0	0.09	ug/L
1,2-Dibromo-3-Chloropropane	ND	5.0	0.5	ug/L
1,2,4-Trichlorobenzene	ND	5.0	0.2	ug/L
Hexachlorobutadiene	ND	5.0	0.2	ug/L
1,2,3-Trichlorobenzene	ND	5.0	0.1	ug/L
cis-1,4-Dichloro-2-butene	ND	5.0	0.4	ug/L
trans-1,4-Dichloro-2-butene	ND	5.0	0.4	ug/L
Xylene (total)	ND	5.0		ug/L

553152-001 Surrogate	%REC	Limits
Dibromofluoromethane	129	70-130
1,2-Dichloroethane-d4	110	70-130
Toluene-d8	98	70-130
Bromofluorobenzene	95	70-130

Legend

**J:** Estimated value

**MDL:** Method Detection Limit

**ND:** Not Detected

**RL:** Reporting Limit

### Purgeable Organics by GC/MS

<b>Lab #:</b> 553152	<b>Project#:</b> CCLF STORMWATER	
<b>Client:</b> Waste Connections	<b>Location:</b> Stormwater Outlet	
<b>Field ID:</b> SOUTH BASIN - S CENTRAL	<b>Batch#:</b> 395299	<b>Prep:</b> EPA 5030B
<b>Lab ID:</b> 553152-002	<b>Sampled:</b> 02/13/26	<b>Analysis:</b> EPA 8260B
<b>Matrix:</b> Water	<b>Received:</b> 02/13/26	<b>Analyst:</b> LYZ
<b>DF:</b> 1.000	<b>Analyzed:</b> 02/13/26	

553152-002 Analyte	Result	RL	MDL	Units
Carbon Disulfide	ND	5.0	0.2	ug/L
Chloroprene	ND	200	0.4	ug/L
3-Chloropropene	ND	5.0	0.3	ug/L
Ethyl methacrylate	ND	50	2.1	ug/L
Ethanol	ND	500	110	ug/L
2-Hexanone	ND	5.0	1.1	ug/L
Isopropanol (IPA)	ND	200	52	ug/L
Methyl acrylonitrile	ND	35	3.7	ug/L
Vinyl Acetate	ND	50	15	ug/L
Acrolein	ND	200	2.7	ug/L
Acrylonitrile	ND	10	0.7	ug/L
Freon 12	ND	5.0	0.1	ug/L
Chloromethane	ND	5.0	0.2	ug/L
Vinyl Chloride	ND	5.0	0.1	ug/L
Bromomethane	ND	5.0	0.2	ug/L
Chloroethane	ND	5.0	0.1	ug/L
Trichlorofluoromethane	ND	5.0	0.06	ug/L
Iodomethane	ND	5.0		ug/L
Acetone	ND	100	5.0	ug/L
Freon 113	ND	5.0	0.1	ug/L
1,1-Dichloroethene	ND	5.0	0.08	ug/L
Methylene Chloride	ND	10	0.2	ug/L
MTBE	ND	5.0	0.09	ug/L
trans-1,2-Dichloroethene	ND	5.0	0.1	ug/L
1,1-Dichloroethane	ND	5.0	0.1	ug/L
2-Butanone	ND	10	1.5	ug/L
cis-1,2-Dichloroethene	ND	5.0	0.09	ug/L
2,2-Dichloropropane	ND	5.0	0.1	ug/L
Chloroform	ND	5.0	0.08	ug/L
Bromochloromethane	ND	5.0	0.2	ug/L
1,1,1-Trichloroethane	ND	5.0	0.09	ug/L
1,1-Dichloropropene	ND	5.0	0.08	ug/L
Carbon Tetrachloride	ND	5.0	0.06	ug/L
1,2-Dichloroethane	ND	5.0	0.1	ug/L
Benzene	ND	1.0	0.1	ug/L
Trichloroethene	ND	5.0	0.1	ug/L
1,2-Dichloropropane	ND	5.0	0.1	ug/L
Bromodichloromethane	ND	5.0	0.09	ug/L
Dibromomethane	ND	5.0	0.1	ug/L
4-Methyl-2-Pentanone	ND	5.0	1.0	ug/L
cis-1,3-Dichloropropene	ND	5.0	0.3	ug/L
Toluene	ND	5.0	0.2	ug/L
trans-1,3-Dichloropropene	ND	5.0	0.3	ug/L
1,1,2-Trichloroethane	ND	5.0	0.2	ug/L
1,3-Dichloropropane	ND	5.0	0.1	ug/L
Tetrachloroethene	ND	5.0	0.1	ug/L

## Purgeable Organics by GC/MS

**Lab #:** 553152

**Project#:** CCLF STORMWATER

**Client:** Waste Connections

**Location:** Stormwater Outlet

553152-002 Analyte	Result	RL	MDL	Units
Dibromochloromethane	ND	5.0	0.08	ug/L
1,2-Dibromoethane	ND	5.0	0.2	ug/L
Chlorobenzene	ND	5.0	0.1	ug/L
1,1,1,2-Tetrachloroethane	ND	5.0	0.08	ug/L
Ethylbenzene	ND	5.0	0.09	ug/L
m,p-Xylenes	ND	5.0	0.2	ug/L
o-Xylene	ND	5.0	0.1	ug/L
Styrene	ND	5.0	0.08	ug/L
Bromoform	ND	5.0	0.08	ug/L
Isopropylbenzene	ND	5.0	0.1	ug/L
1,1,2,2-Tetrachloroethane	ND	5.0	0.2	ug/L
1,2,3-Trichloropropane	ND	5.0	0.2	ug/L
Propylbenzene	ND	5.0	0.1	ug/L
Bromobenzene	ND	5.0	0.09	ug/L
1,3,5-Trimethylbenzene	ND	5.0	0.1	ug/L
2-Chlorotoluene	ND	5.0	0.1	ug/L
4-Chlorotoluene	ND	5.0	0.1	ug/L
tert-Butylbenzene	ND	5.0	0.1	ug/L
1,2,4-Trimethylbenzene	ND	5.0	0.1	ug/L
sec-Butylbenzene	ND	5.0	0.1	ug/L
para-Isopropyl Toluene	ND	5.0	0.1	ug/L
1,3-Dichlorobenzene	ND	5.0	0.1	ug/L
1,4-Dichlorobenzene	ND	5.0	0.2	ug/L
n-Butylbenzene	ND	5.0	0.1	ug/L
1,2-Dichlorobenzene	ND	5.0	0.09	ug/L
1,2-Dibromo-3-Chloropropane	ND	5.0	0.5	ug/L
1,2,4-Trichlorobenzene	ND	5.0	0.2	ug/L
Hexachlorobutadiene	ND	5.0	0.2	ug/L
1,2,3-Trichlorobenzene	ND	5.0	0.1	ug/L
cis-1,4-Dichloro-2-butene	ND	5.0	0.4	ug/L
trans-1,4-Dichloro-2-butene	ND	5.0	0.4	ug/L
Xylene (total)	ND	5.0		ug/L

553152-002 Surrogate	%REC	Limits
Dibromofluoromethane	117	70-130
1,2-Dichloroethane-d4	113	70-130
Toluene-d8	97	70-130
Bromofluorobenzene	95	70-130

Legend

- MDL:** Method Detection Limit
- ND:** Not Detected
- RL:** Reporting Limit

### Purgeable Organics by GC/MS

<b>Lab #:</b> 553152	<b>Project#:</b> CCLF STORMWATER	
<b>Client:</b> Waste Connections	<b>Location:</b> Stormwater Outlet	
<b>Field ID:</b> SOUTH BASIN - W CENTRAL	<b>Batch#:</b> 395299	<b>Prep:</b> EPA 5030B
<b>Lab ID:</b> 553152-003	<b>Sampled:</b> 02/13/26	<b>Analysis:</b> EPA 8260B
<b>Matrix:</b> Water	<b>Received:</b> 02/13/26	<b>Analyst:</b> LYZ
<b>DF:</b> 1.000	<b>Analyzed:</b> 02/13/26	

553152-003 Analyte	Result	RL	MDL	Units
Carbon Disulfide	ND	5.0	0.2	ug/L
Chloroprene	ND	200	0.4	ug/L
3-Chloropropene	ND	5.0	0.3	ug/L
Ethyl methacrylate	ND	50	2.1	ug/L
Ethanol	ND	500	110	ug/L
2-Hexanone	ND	5.0	1.1	ug/L
Isopropanol (IPA)	ND	200	52	ug/L
Methyl acrylonitrile	ND	35	3.7	ug/L
Vinyl Acetate	ND	50	15	ug/L
Acrolein	ND	200	2.7	ug/L
Acrylonitrile	ND	10	0.7	ug/L
Freon 12	ND	5.0	0.1	ug/L
Chloromethane	ND	5.0	0.2	ug/L
Vinyl Chloride	ND	5.0	0.1	ug/L
Bromomethane	ND	5.0	0.2	ug/L
Chloroethane	ND	5.0	0.1	ug/L
Trichlorofluoromethane	ND	5.0	0.06	ug/L
Iodomethane	ND	5.0		ug/L
Acetone	ND	100	5.0	ug/L
Freon 113	ND	5.0	0.1	ug/L
1,1-Dichloroethene	ND	5.0	0.08	ug/L
Methylene Chloride	ND	10	0.2	ug/L
MTBE	ND	5.0	0.09	ug/L
trans-1,2-Dichloroethene	ND	5.0	0.1	ug/L
1,1-Dichloroethane	ND	5.0	0.1	ug/L
2-Butanone	ND	10	1.5	ug/L
cis-1,2-Dichloroethene	ND	5.0	0.09	ug/L
2,2-Dichloropropane	ND	5.0	0.1	ug/L
Chloroform	ND	5.0	0.08	ug/L
Bromochloromethane	ND	5.0	0.2	ug/L
1,1,1-Trichloroethane	ND	5.0	0.09	ug/L
1,1-Dichloropropene	ND	5.0	0.08	ug/L
Carbon Tetrachloride	ND	5.0	0.06	ug/L
1,2-Dichloroethane	ND	5.0	0.1	ug/L
Benzene	ND	1.0	0.1	ug/L
Trichloroethene	ND	5.0	0.1	ug/L
1,2-Dichloropropane	ND	5.0	0.1	ug/L
Bromodichloromethane	ND	5.0	0.09	ug/L
Dibromomethane	ND	5.0	0.1	ug/L
4-Methyl-2-Pentanone	ND	5.0	1.0	ug/L
cis-1,3-Dichloropropene	ND	5.0	0.3	ug/L
Toluene	ND	5.0	0.2	ug/L
trans-1,3-Dichloropropene	ND	5.0	0.3	ug/L
1,1,2-Trichloroethane	ND	5.0	0.2	ug/L
1,3-Dichloropropane	ND	5.0	0.1	ug/L
Tetrachloroethene	ND	5.0	0.1	ug/L

## Purgeable Organics by GC/MS

**Lab #:** 553152

**Project#:** CCLF STORMWATER

**Client:** Waste Connections

**Location:** Stormwater Outlet

553152-003 Analyte	Result	RL	MDL	Units
Dibromochloromethane	ND	5.0	0.08	ug/L
1,2-Dibromoethane	ND	5.0	0.2	ug/L
Chlorobenzene	ND	5.0	0.1	ug/L
1,1,1,2-Tetrachloroethane	ND	5.0	0.08	ug/L
Ethylbenzene	ND	5.0	0.09	ug/L
m,p-Xylenes	ND	5.0	0.2	ug/L
o-Xylene	ND	5.0	0.1	ug/L
Styrene	ND	5.0	0.08	ug/L
Bromoform	ND	5.0	0.08	ug/L
Isopropylbenzene	ND	5.0	0.1	ug/L
1,1,2,2-Tetrachloroethane	ND	5.0	0.2	ug/L
1,2,3-Trichloropropane	ND	5.0	0.2	ug/L
Propylbenzene	ND	5.0	0.1	ug/L
Bromobenzene	ND	5.0	0.09	ug/L
1,3,5-Trimethylbenzene	ND	5.0	0.1	ug/L
2-Chlorotoluene	ND	5.0	0.1	ug/L
4-Chlorotoluene	ND	5.0	0.1	ug/L
tert-Butylbenzene	ND	5.0	0.1	ug/L
1,2,4-Trimethylbenzene	ND	5.0	0.1	ug/L
sec-Butylbenzene	ND	5.0	0.1	ug/L
para-Isopropyl Toluene	ND	5.0	0.1	ug/L
1,3-Dichlorobenzene	ND	5.0	0.1	ug/L
1,4-Dichlorobenzene	ND	5.0	0.2	ug/L
n-Butylbenzene	ND	5.0	0.1	ug/L
1,2-Dichlorobenzene	ND	5.0	0.09	ug/L
1,2-Dibromo-3-Chloropropane	ND	5.0	0.5	ug/L
1,2,4-Trichlorobenzene	ND	5.0	0.2	ug/L
Hexachlorobutadiene	ND	5.0	0.2	ug/L
1,2,3-Trichlorobenzene	ND	5.0	0.1	ug/L
cis-1,4-Dichloro-2-butene	ND	5.0	0.4	ug/L
trans-1,4-Dichloro-2-butene	ND	5.0	0.4	ug/L
Xylene (total)	ND	5.0		ug/L

553152-003 Surrogate	%REC	Limits
Dibromofluoromethane	110	70-130
1,2-Dichloroethane-d4	110	70-130
Toluene-d8	97	70-130
Bromofluorobenzene	97	70-130

Legend

- MDL:** Method Detection Limit
- ND:** Not Detected
- RL:** Reporting Limit

## Enthalpy Analytical Report

<b>Lab #:</b> 553152	<b>Project#:</b> CCLF STORMWATER	
<b>Client:</b> Waste Connections	<b>Location:</b> Stormwater Outlet	
<b>Field ID:</b> SOUTH BASIN - NW CORNER	<b>Batch#:</b> 395350	<b>Analyzed:</b> 02/15/26
<b>Lab ID:</b> 553152-001	<b>Sampled:</b> 02/13/26	<b>Prep:</b> EPA 3510C
<b>Matrix:</b> Water	<b>Received:</b> 02/13/26	<b>Analysis:</b> EPA 8270E
<b>DF:</b> 0.9346	<b>Prepared:</b> 02/14/26	<b>Analyst:</b> ZFA

553152-001 Analyte	Result	RL	MDL	Units
Carbazole	ND	9.3	2.6	ug/L
N-Nitrosodimethylamine	ND	9.3	2.7	ug/L
Aniline	ND	9.3	2.7	ug/L
bis(2-Chloroethyl)ether	ND	23	3.5	ug/L
2-Chlorophenol	ND	9.3	3.4	ug/L
1,3-Dichlorobenzene	ND	9.3	3.1	ug/L
1,4-Dichlorobenzene	ND	9.3	3.2	ug/L
Benzyl alcohol	ND	23	5.4	ug/L
1,2-Dichlorobenzene	ND	9.3	3.1	ug/L
bis(2-Chloroisopropyl) ether	ND	9.3	3.6	ug/L
N-Nitroso-di-n-propylamine	ND	9.3	3.6	ug/L
Hexachloroethane	ND	9.3	2.8	ug/L
Nitrobenzene	ND	23	7.9	ug/L
Isophorone	ND	9.3	3.4	ug/L
2-Nitrophenol	ND	9.3	5.1	ug/L
2,4-Dimethylphenol	ND	9.3	3.0	ug/L
bis(2-Chloroethoxy)methane	ND	9.3	3.4	ug/L
2,4-Dichlorophenol	ND	9.3	3.5	ug/L
1,2,4-Trichlorobenzene	ND	9.3	3.2	ug/L
4-Chloroaniline	ND	9.3	2.9	ug/L
Hexachlorobutadiene	ND	9.3	2.1	ug/L
4-Chloro-3-methylphenol	ND	9.3	3.4	ug/L
2-Methylnaphthalene	ND	9.3	3.1	ug/L
Hexachlorocyclopentadiene	ND	23	7.3	ug/L
2,4,6-Trichlorophenol	ND	9.3	3.8	ug/L
2,4,5-Trichlorophenol	ND	9.3	3.5	ug/L
2-Chloronaphthalene	ND	9.3	3.2	ug/L
2-Nitroaniline	ND	47	4.1	ug/L
Dimethylphthalate	ND	9.3	3.2	ug/L
Acenaphthylene	ND	9.3	3.6	ug/L
2,6-Dinitrotoluene	ND	9.3	4.1	ug/L
3-Nitroaniline	ND	9.3	3.7	ug/L
Acenaphthene	ND	9.3	3.0	ug/L
2,4-Dinitrophenol	ND	47	14	ug/L
4-Nitrophenol	ND	47	7.9	ug/L
Dibenzofuran	ND	9.3	3.0	ug/L
2,4-Dinitrotoluene	ND	9.3	4.0	ug/L
Diethylphthalate	ND	9.3	2.7	ug/L
Fluorene	ND	9.3	2.9	ug/L
4-Chlorophenyl-phenylether	ND	9.3	2.9	ug/L
4-Nitroaniline	ND	9.3	3.1	ug/L
4,6-Dinitro-2-methylphenol	ND	47	16	ug/L
N-Nitrosodiphenylamine	ND	9.3	3.7	ug/L
1,2-diphenylhydrazine (as azobenzene)	ND	9.3	2.7	ug/L
4-Bromophenyl-phenylether	ND	9.3	3.1	ug/L
Hexachlorobenzene	ND	9.3	2.8	ug/L

## Enthalpy Analytical Report

**Lab #: 553152**
**Project#: CCLF STORMWATER**
**Client: Waste Connections**
**Location: Stormwater Outlet**

553152-001 Analyte	Result	RL	MDL	Units
Pentachlorophenol	ND	23	5.3	ug/L
Phenanthrene	ND	9.3	2.7	ug/L
Anthracene	ND	9.3	2.6	ug/L
Di-n-butylphthalate	ND	9.3	2.8	ug/L
Fluoranthene	ND	9.3	2.6	ug/L
Benzydine	ND	47	17	ug/L
Pyrene	ND	9.3	2.5	ug/L
Butylbenzylphthalate	ND	9.3	3.4	ug/L
3,3'-Dichlorobenzidine	ND	23	4.9	ug/L
Benzo(a)anthracene	ND	9.3	2.2	ug/L
Chrysene	ND	9.3	2.3	ug/L
bis(2-Ethylhexyl)phthalate	ND	9.3	3.1	ug/L
Di-n-octylphthalate	ND	9.3	4.4	ug/L
Benzo(b)fluoranthene	ND	9.3	2.8	ug/L
Benzo(k)fluoranthene	ND	9.3	2.9	ug/L
Benzo(a)pyrene	ND	9.3	2.9	ug/L
Indeno(1,2,3-cd)pyrene	ND	9.3	4.0	ug/L
Dibenz(a,h)anthracene	ND	9.3	3.9	ug/L
Benzo(g,h,i)perylene	ND	9.3	3.9	ug/L

553152-001 Surrogate	%REC	Limits
2-Fluorophenol	29	15-120
Phenol-d6	23	15-120
2,4,6-Tribromophenol	64	15-140
Nitrobenzene-d5	57	15-123
2-Fluorobiphenyl	49	15-120
Terphenyl-d14	69	15-120

## Legend

- MDL:** Method Detection Limit
- ND:** Not Detected at or above MDL
- RL:** Reporting Limit

## Enthalpy Analytical Report

<b>Lab #:</b> 553152	<b>Project#:</b> CCLF STORMWATER	
<b>Client:</b> Waste Connections	<b>Location:</b> Stormwater Outlet	
<b>Field ID:</b> SOUTH BASIN - S CENTRAL	<b>Batch#:</b> 395350	<b>Analyzed:</b> 02/15/26
<b>Lab ID:</b> 553152-002	<b>Sampled:</b> 02/13/26	<b>Prep:</b> EPA 3510C
<b>Matrix:</b> Water	<b>Received:</b> 02/13/26	<b>Analysis:</b> EPA 8270E
<b>DF:</b> 0.9434	<b>Prepared:</b> 02/14/26	<b>Analyst:</b> ZFA

553152-002 Analyte	Result	RL	MDL	Units
Carbazole	ND	9.4	2.6	ug/L
N-Nitrosodimethylamine	ND	9.4	2.7	ug/L
Aniline	ND	9.4	2.7	ug/L
bis(2-Chloroethyl)ether	ND	24	3.5	ug/L
2-Chlorophenol	ND	9.4	3.4	ug/L
1,3-Dichlorobenzene	ND	9.4	3.1	ug/L
1,4-Dichlorobenzene	ND	9.4	3.2	ug/L
Benzyl alcohol	ND	24	5.4	ug/L
1,2-Dichlorobenzene	ND	9.4	3.1	ug/L
bis(2-Chloroisopropyl) ether	ND	9.4	3.6	ug/L
N-Nitroso-di-n-propylamine	ND	9.4	3.6	ug/L
Hexachloroethane	ND	9.4	2.8	ug/L
Nitrobenzene	ND	24	7.9	ug/L
Isophorone	ND	9.4	3.5	ug/L
2-Nitrophenol	ND	9.4	5.1	ug/L
2,4-Dimethylphenol	ND	9.4	3.1	ug/L
bis(2-Chloroethoxy)methane	ND	9.4	3.5	ug/L
2,4-Dichlorophenol	ND	9.4	3.5	ug/L
1,2,4-Trichlorobenzene	ND	9.4	3.2	ug/L
4-Chloroaniline	ND	9.4	2.9	ug/L
Hexachlorobutadiene	ND	9.4	2.1	ug/L
4-Chloro-3-methylphenol	ND	9.4	3.4	ug/L
2-Methylnaphthalene	ND	9.4	3.2	ug/L
Hexachlorocyclopentadiene	ND	24	7.4	ug/L
2,4,6-Trichlorophenol	ND	9.4	3.8	ug/L
2,4,5-Trichlorophenol	ND	9.4	3.5	ug/L
2-Chloronaphthalene	ND	9.4	3.2	ug/L
2-Nitroaniline	ND	47	4.1	ug/L
Dimethylphthalate	ND	9.4	3.2	ug/L
Acenaphthylene	ND	9.4	3.6	ug/L
2,6-Dinitrotoluene	ND	9.4	4.2	ug/L
3-Nitroaniline	ND	9.4	3.8	ug/L
Acenaphthene	ND	9.4	3.1	ug/L
2,4-Dinitrophenol	ND	47	14	ug/L
4-Nitrophenol	ND	47	8.0	ug/L
Dibenzofuran	ND	9.4	3.0	ug/L
2,4-Dinitrotoluene	ND	9.4	4.0	ug/L
Diethylphthalate	ND	9.4	2.8	ug/L
Fluorene	ND	9.4	2.9	ug/L
4-Chlorophenyl-phenylether	ND	9.4	2.9	ug/L
4-Nitroaniline	ND	9.4	3.2	ug/L
4,6-Dinitro-2-methylphenol	ND	47	16	ug/L
N-Nitrosodiphenylamine	ND	9.4	3.7	ug/L
1,2-diphenylhydrazine (as azobenzene)	ND	9.4	2.8	ug/L
4-Bromophenyl-phenylether	ND	9.4	3.1	ug/L
Hexachlorobenzene	ND	9.4	2.9	ug/L

## Enthalpy Analytical Report

**Lab #: 553152**
**Project#: CCLF STORMWATER**
**Client: Waste Connections**
**Location: Stormwater Outlet**

553152-002 Analyte	Result	RL	MDL	Units
Pentachlorophenol	ND	24	5.4	ug/L
Phenanthrene	ND	9.4	2.8	ug/L
Anthracene	ND	9.4	2.6	ug/L
Di-n-butylphthalate	ND	9.4	2.8	ug/L
Fluoranthene	ND	9.4	2.7	ug/L
Benzydine	ND	47	18	ug/L
Pyrene	ND	9.4	2.5	ug/L
Butylbenzylphthalate	ND	9.4	3.4	ug/L
3,3'-Dichlorobenzidine	ND	24	4.9	ug/L
Benzo(a)anthracene	ND	9.4	2.3	ug/L
Chrysene	ND	9.4	2.3	ug/L
bis(2-Ethylhexyl)phthalate	ND	9.4	3.1	ug/L
Di-n-octylphthalate	ND	9.4	4.4	ug/L
Benzo(b)fluoranthene	ND	9.4	2.9	ug/L
Benzo(k)fluoranthene	ND	9.4	2.9	ug/L
Benzo(a)pyrene	ND	9.4	3.0	ug/L
Indeno(1,2,3-cd)pyrene	ND	9.4	4.0	ug/L
Dibenz(a,h)anthracene	ND	9.4	3.9	ug/L
Benzo(g,h,i)perylene	ND	9.4	3.9	ug/L

553152-002 Surrogate	%REC	Limits
2-Fluorophenol	28	15-120
Phenol-d6	23	15-120
2,4,6-Tribromophenol	62	15-140
Nitrobenzene-d5	54	15-123
2-Fluorobiphenyl	48	15-120
Terphenyl-d14	68	15-120

## Legend

- MDL:** Method Detection Limit  
**ND:** Not Detected at or above MDL  
**RL:** Reporting Limit

## Enthalpy Analytical Report

<b>Lab #:</b> 553152	<b>Project#:</b> CCLF STORMWATER	
<b>Client:</b> Waste Connections	<b>Location:</b> Stormwater Outlet	
<b>Field ID:</b> SOUTH BASIN - W CENTRAL	<b>Batch#:</b> 395350	<b>Analyzed:</b> 02/15/26
<b>Lab ID:</b> 553152-003	<b>Sampled:</b> 02/13/26	<b>Prep:</b> EPA 3510C
<b>Matrix:</b> Water	<b>Received:</b> 02/13/26	<b>Analysis:</b> EPA 8270E
<b>DF:</b> 0.9390	<b>Prepared:</b> 02/14/26	<b>Analyst:</b> ZFA

553152-003 Analyte	Result	RL	MDL	Units
Carbazole	ND	9.4	2.6	ug/L
N-Nitrosodimethylamine	ND	9.4	2.7	ug/L
Aniline	ND	9.4	2.7	ug/L
bis(2-Chloroethyl)ether	ND	23	3.5	ug/L
2-Chlorophenol	ND	9.4	3.4	ug/L
1,3-Dichlorobenzene	ND	9.4	3.1	ug/L
1,4-Dichlorobenzene	ND	9.4	3.2	ug/L
Benzyl alcohol	ND	23	5.4	ug/L
1,2-Dichlorobenzene	ND	9.4	3.1	ug/L
bis(2-Chloroisopropyl) ether	ND	9.4	3.6	ug/L
N-Nitroso-di-n-propylamine	ND	9.4	3.6	ug/L
Hexachloroethane	ND	9.4	2.8	ug/L
Nitrobenzene	ND	23	7.9	ug/L
Isophorone	ND	9.4	3.5	ug/L
2-Nitrophenol	ND	9.4	5.1	ug/L
2,4-Dimethylphenol	ND	9.4	3.0	ug/L
bis(2-Chloroethoxy)methane	ND	9.4	3.4	ug/L
2,4-Dichlorophenol	ND	9.4	3.5	ug/L
1,2,4-Trichlorobenzene	ND	9.4	3.2	ug/L
4-Chloroaniline	ND	9.4	2.9	ug/L
Hexachlorobutadiene	ND	9.4	2.1	ug/L
4-Chloro-3-methylphenol	ND	9.4	3.4	ug/L
2-Methylnaphthalene	ND	9.4	3.2	ug/L
Hexachlorocyclopentadiene	ND	23	7.3	ug/L
2,4,6-Trichlorophenol	ND	9.4	3.8	ug/L
2,4,5-Trichlorophenol	ND	9.4	3.5	ug/L
2-Chloronaphthalene	ND	9.4	3.2	ug/L
2-Nitroaniline	ND	47	4.1	ug/L
Dimethylphthalate	ND	9.4	3.2	ug/L
Acenaphthylene	ND	9.4	3.6	ug/L
2,6-Dinitrotoluene	ND	9.4	4.2	ug/L
3-Nitroaniline	ND	9.4	3.7	ug/L
Acenaphthene	ND	9.4	3.0	ug/L
2,4-Dinitrophenol	ND	47	14	ug/L
4-Nitrophenol	ND	47	8.0	ug/L
Dibenzofuran	ND	9.4	3.0	ug/L
2,4-Dinitrotoluene	ND	9.4	4.0	ug/L
Diethylphthalate	ND	9.4	2.7	ug/L
Fluorene	ND	9.4	2.9	ug/L
4-Chlorophenyl-phenylether	ND	9.4	2.9	ug/L
4-Nitroaniline	ND	9.4	3.1	ug/L
4,6-Dinitro-2-methylphenol	ND	47	16	ug/L
N-Nitrosodiphenylamine	ND	9.4	3.7	ug/L
1,2-diphenylhydrazine (as azobenzene)	ND	9.4	2.7	ug/L
4-Bromophenyl-phenylether	ND	9.4	3.1	ug/L
Hexachlorobenzene	ND	9.4	2.8	ug/L

## Enthalpy Analytical Report

**Lab #: 553152**
**Project#: CCLF STORMWATER**
**Client: Waste Connections**
**Location: Stormwater Outlet**

553152-003 Analyte	Result	RL	MDL	Units
Pentachlorophenol	ND	23	5.3	ug/L
Phenanthrene	ND	9.4	2.7	ug/L
Anthracene	ND	9.4	2.6	ug/L
Di-n-butylphthalate	ND	9.4	2.8	ug/L
Fluoranthene	ND	9.4	2.6	ug/L
Benzydine	ND	47	17	ug/L
Pyrene	ND	9.4	2.5	ug/L
Butylbenzylphthalate	ND	9.4	3.4	ug/L
3,3'-Dichlorobenzidine	ND	23	4.9	ug/L
Benzo(a)anthracene	ND	9.4	2.3	ug/L
Chrysene	ND	9.4	2.3	ug/L
bis(2-Ethylhexyl)phthalate	ND	9.4	3.1	ug/L
Di-n-octylphthalate	ND	9.4	4.4	ug/L
Benzo(b)fluoranthene	ND	9.4	2.8	ug/L
Benzo(k)fluoranthene	ND	9.4	2.9	ug/L
Benzo(a)pyrene	ND	9.4	3.0	ug/L
Indeno(1,2,3-cd)pyrene	ND	9.4	4.0	ug/L
Dibenz(a,h)anthracene	ND	9.4	3.9	ug/L
Benzo(g,h,i)perylene	ND	9.4	3.9	ug/L

553152-003 Surrogate	%REC	Limits
2-Fluorophenol	34	15-120
Phenol-d6	26	15-120
2,4,6-Tribromophenol	68	15-140
Nitrobenzene-d5	68	15-123
2-Fluorobiphenyl	55	15-120
Terphenyl-d14	73	15-120

## Legend

- MDL:** Method Detection Limit  
**ND:** Not Detected at or above MDL  
**RL:** Reporting Limit

## Enthalpy Analytical Report

<b>Lab #:</b> 553152	<b>Project#:</b> CCLF STORMWATER	
<b>Client:</b> Waste Connections	<b>Location:</b> Stormwater Outlet	
<b>Field ID:</b> SOUTH BASIN - NW CORNER	<b>Batch#:</b> 395350	<b>Analyzed:</b> 02/15/26
<b>Lab ID:</b> 553152-001	<b>Sampled:</b> 02/13/26	<b>Prep:</b> EPA 3510C
<b>Matrix:</b> Water	<b>Received:</b> 02/13/26	<b>Analysis:</b> EPA 625.1
<b>DF:</b> 0.9346	<b>Prepared:</b> 02/14/26	<b>Analyst:</b> ZFA

553152-001 Analyte	Result	RL	MDL	Units
Pyridine	ND	9.3	2.6	ug/L
Phenol	ND	9.3	2.0	ug/L
2-Methylphenol	ND	9.3	3.0	ug/L
3-,4-Methylphenol	ND	9.3	2.8	ug/L
Benzoic acid	ND	47	10	ug/L
Naphthalene	ND	9.3	3.4	ug/L
Cresol	ND	9.3		ug/L

553152-001 Surrogate	%REC	Limits
2-Fluorophenol	29	15-120
Phenol-d6	23	15-120
2,4,6-Tribromophenol	64	15-140
Nitrobenzene-d5	57	15-123
2-Fluorobiphenyl	49	15-120
Terphenyl-d14	69	15-120

Legend

- MDL:** Method Detection Limit
- ND:** Not Detected at or above MDL
- RL:** Reporting Limit

## Enthalpy Analytical Report

<b>Lab #:</b> 553152	<b>Project#:</b> CCLF STORMWATER	
<b>Client:</b> Waste Connections	<b>Location:</b> Stormwater Outlet	
<b>Field ID:</b> SOUTH BASIN - NW CORNER	<b>DF:</b> 0.9346	<b>Prepared:</b> 02/14/26
<b>Type:</b> SAMPLE	<b>Batch#:</b> 395350	<b>Prep:</b> EPA 3510C
<b>Lab ID:</b> 553152-001	<b>Sampled:</b> 02/13/26	<b>Analysis:</b> EPA 625.1
<b>Matrix:</b> Water	<b>Received:</b> 02/13/26	<b>Analyst:</b> ZFA

553152-001 Analyte	Result	RL	MDL	Units	Analyzed
a-Terpineol	ND	9.3	1.9	ug/L	02/14/26

553152-001 Surrogate	%REC	Limits	Analyzed
2-Fluorophenol	29 *	36-95	02/15/26
Phenol-d6	23 *	28-82	02/15/26
2,4,6-Tribromophenol	64	61-140	02/15/26
Nitrobenzene-d5	57	48-123	02/15/26
2-Fluorobiphenyl	49 *	51-105	02/15/26
Terphenyl-d14	69	65-117	02/15/26

<b>Field ID:</b> SOUTH BASIN - S CENTRAL	<b>DF:</b> 0.9434	
<b>Type:</b> SAMPLE	<b>Batch#:</b> 395350	
<b>Lab ID:</b> 553152-002	<b>Sampled:</b> 02/13/26	
<b>Matrix:</b> Water	<b>Received:</b> 02/13/26	
	<b>Prepared:</b> 02/14/26	
	<b>Prep:</b> EPA 3510C	
	<b>Analysis:</b> EPA 625.1	
	<b>Analyst:</b> ZFA	

553152-002 Analyte	Result	RL	MDL	Units	Analyzed
a-Terpineol	ND	9.4	1.9	ug/L	02/14/26

553152-002 Surrogate	%REC	Limits	Analyzed
2-Fluorophenol	28 *	36-95	02/15/26
Phenol-d6	23 *	28-82	02/15/26
2,4,6-Tribromophenol	62	61-140	02/15/26
Nitrobenzene-d5	54	48-123	02/15/26
2-Fluorobiphenyl	48 *	51-105	02/15/26
Terphenyl-d14	68	65-117	02/15/26

<b>Field ID:</b> SOUTH BASIN - W CENTRAL	<b>DF:</b> 0.9390	
<b>Type:</b> SAMPLE	<b>Batch#:</b> 395350	
<b>Lab ID:</b> 553152-003	<b>Sampled:</b> 02/13/26	
<b>Matrix:</b> Water	<b>Received:</b> 02/13/26	
	<b>Prepared:</b> 02/14/26	
	<b>Prep:</b> EPA 3510C	
	<b>Analysis:</b> EPA 625.1	
	<b>Analyst:</b> ZFA	

553152-003 Analyte	Result	RL	MDL	Units	Analyzed
a-Terpineol	ND	9.4	1.9	ug/L	02/14/26

553152-003 Surrogate	%REC	Limits	Analyzed
2-Fluorophenol	34 *	36-95	02/15/26
Phenol-d6	26 *	28-82	02/15/26
2,4,6-Tribromophenol	68	61-140	02/15/26
Nitrobenzene-d5	68	48-123	02/15/26
2-Fluorobiphenyl	55	51-105	02/15/26
Terphenyl-d14	73	65-117	02/15/26

## Enthalpy Analytical Report

<b>Lab #:</b> 553152	<b>Project#:</b> CCLF STORMWATER
<b>Client:</b> Waste Connections	<b>Location:</b> Stormwater Outlet

<b>Type:</b> BLANK	<b>DF:</b> 1.000	<b>Prep:</b> EPA 3510C
<b>Lab ID:</b> QC1340542	<b>Batch#:</b> 395350	<b>Analysis:</b> EPA 625.1
<b>Matrix:</b> Water	<b>Prepared:</b> 02/13/26	<b>Analyst:</b> TJW

QC1340542 Analyte	Result	RL	MDL	Units	Analyzed	Qual
a-Terpineol	ND	10	2.1	ug/L	02/14/26	b

QC1340542 Surrogate	%REC	Limits	Analyzed
2-Fluorophenol	42	36-95	02/13/26
Phenol-d6	26 *	28-82	02/13/26
2,4,6-Tribromophenol	54 *	61-140	02/13/26
Nitrobenzene-d5	57	48-123	02/13/26
2-Fluorobiphenyl	55	51-105	02/13/26
Terphenyl-d14	68	65-117	02/13/26

Legend

\*: Value is outside QC limits

**MDL:** Method Detection Limit

**ND:** Not Detected at or above MDL

**RL:** Reporting Limit

**b:** See narrative

## Enthalpy Analytical Report

<b>Lab #:</b> 553152	<b>Project#:</b> CCLF STORMWATER	
<b>Client:</b> Waste Connections	<b>Location:</b> Stormwater Outlet	
<b>Field ID:</b> SOUTH BASIN - S CENTRAL	<b>Batch#:</b> 395350	<b>Analyzed:</b> 02/15/26
<b>Lab ID:</b> 553152-002	<b>Sampled:</b> 02/13/26	<b>Prep:</b> EPA 3510C
<b>Matrix:</b> Water	<b>Received:</b> 02/13/26	<b>Analysis:</b> EPA 625.1
<b>DF:</b> 0.9434	<b>Prepared:</b> 02/14/26	<b>Analyst:</b> ZFA

553152-002 Analyte	Result	RL	MDL	Units
Pyridine	ND	9.4	2.7	ug/L
Phenol	ND	9.4	2.0	ug/L
2-Methylphenol	ND	9.4	3.1	ug/L
3-,4-Methylphenol	ND	9.4	2.8	ug/L
Benzoic acid	ND	47	10	ug/L
Naphthalene	ND	9.4	3.4	ug/L
Cresol	ND	9.4		ug/L

553152-002 Surrogate	%REC	Limits
2-Fluorophenol	28	15-120
Phenol-d6	23	15-120
2,4,6-Tribromophenol	62	15-140
Nitrobenzene-d5	54	15-123
2-Fluorobiphenyl	48	15-120
Terphenyl-d14	68	15-120

Legend

- MDL:** Method Detection Limit
- ND:** Not Detected at or above MDL
- RL:** Reporting Limit

## Enthalpy Analytical Report

<b>Lab #:</b> 553152	<b>Project#:</b> CCLF STORMWATER	
<b>Client:</b> Waste Connections	<b>Location:</b> Stormwater Outlet	
<b>Field ID:</b> SOUTH BASIN - W CENTRAL	<b>Batch#:</b> 395350	<b>Analyzed:</b> 02/15/26
<b>Lab ID:</b> 553152-003	<b>Sampled:</b> 02/13/26	<b>Prep:</b> EPA 3510C
<b>Matrix:</b> Water	<b>Received:</b> 02/13/26	<b>Analysis:</b> EPA 625.1
<b>DF:</b> 0.9390	<b>Prepared:</b> 02/14/26	<b>Analyst:</b> ZFA

553152-003 Analyte	Result	RL	MDL	Units
Pyridine	ND	9.4	2.6	ug/L
Phenol	ND	9.4	2.0	ug/L
2-Methylphenol	ND	9.4	3.0	ug/L
3-,4-Methylphenol	ND	9.4	2.8	ug/L
Benzoic acid	ND	47	10	ug/L
Naphthalene	ND	9.4	3.4	ug/L
Cresol	ND	9.4		ug/L

553152-003 Surrogate	%REC	Limits
2-Fluorophenol	34	15-120
Phenol-d6	26	15-120
2,4,6-Tribromophenol	68	15-140
Nitrobenzene-d5	68	15-123
2-Fluorobiphenyl	55	15-120
Terphenyl-d14	73	15-120

Legend

- MDL:** Method Detection Limit
- ND:** Not Detected at or above MDL
- RL:** Reporting Limit

## Enthalpy Analytical Report

<b>Lab #:</b> 553152	<b>Project#:</b> CCLF STORMWATER	
<b>Client:</b> Waste Connections	<b>Location:</b> Stormwater Outlet	
<b>Field ID:</b> SOUTH BASIN - NW CORNER	<b>Batch#:</b> 395408	<b>Prep:</b> EPA 3535
<b>Type:</b> SAMPLE	<b>Sampled:</b> 02/13/26	<b>Analysis:</b> EPA 8270C-SIM
<b>Lab ID:</b> 553152-001	<b>Received:</b> 02/13/26	<b>Analyst:</b> ZFA
<b>Matrix:</b> Water	<b>Prepared:</b> 02/14/26	
<b>DF:</b> 1.000	<b>Analyzed:</b> 02/15/26	

553152-001 Analyte	Result	RL	MDL	Units
1,4-Dioxane	2.2	1.0	0.84	ug/L

553152-001 Surrogate	%REC	Limits
1,4-Dioxane-d8 (SUR)	98	80-120

<b>Field ID:</b> SOUTH BASIN - S CENTRAL	<b>Batch#:</b> 395408	
<b>Type:</b> SAMPLE	<b>Sampled:</b> 02/13/26	
<b>Lab ID:</b> 553152-002	<b>Received:</b> 02/13/26	
<b>Matrix:</b> Water	<b>Prepared:</b> 02/14/26	
<b>DF:</b> 1.000	<b>Analyzed:</b> 02/15/26	
	<b>Prep:</b> EPA 3535	
	<b>Analysis:</b> EPA 8270C-SIM	
	<b>Analyst:</b> ZFA	

553152-002 Analyte	Result	RL	MDL	Units
1,4-Dioxane	2.0	1.0	0.84	ug/L

553152-002 Surrogate	%REC	Limits
1,4-Dioxane-d8 (SUR)	97	80-120

<b>Field ID:</b> SOUTH BASIN - W CENTRAL	<b>Batch#:</b> 395408	
<b>Type:</b> SAMPLE	<b>Sampled:</b> 02/13/26	
<b>Lab ID:</b> 553152-003	<b>Received:</b> 02/13/26	
<b>Matrix:</b> Water	<b>Prepared:</b> 02/14/26	
<b>DF:</b> 1.000	<b>Analyzed:</b> 02/15/26	
	<b>Prep:</b> EPA 3535	
	<b>Analysis:</b> EPA 8270C-SIM	
	<b>Analyst:</b> ZFA	

553152-003 Analyte	Result	RL	MDL	Units
1,4-Dioxane	1.9	1.0	0.84	ug/L

553152-003 Surrogate	%REC	Limits
1,4-Dioxane-d8 (SUR)	99	80-120

<b>Type:</b> BLANK	<b>Batch#:</b> 395408	<b>Analysis:</b> EPA 8270C-SIM
<b>Lab ID:</b> QC1340760	<b>Prepared:</b> 02/14/26	<b>Analyst:</b> ZFA
<b>Matrix:</b> Water	<b>Analyzed:</b> 02/14/26	
<b>DF:</b> 1.000	<b>Prep:</b> EPA 3535	

QC1340760 Analyte	Result	RL	MDL	Units
1,4-Dioxane	ND	1.0	0.84	ug/L

QC1340760 Surrogate	%REC	Limits
1,4-Dioxane-d8 (SUR)	102	80-120

Legend

- MDL:** Method Detection Limit
- ND:** Not Detected at or above MDL
- RL:** Reporting Limit

## Organochlorine Pesticides

<b>Lab #:</b> 553152	<b>Project#:</b> CCLF STORMWATER	
<b>Client:</b> Waste Connections	<b>Location:</b> Stormwater Outlet	
<b>Field ID:</b> SOUTH BASIN - NW CORNER	<b>Batch#:</b> 395405	<b>Analyzed:</b> 02/14/26
<b>Lab ID:</b> 553152-001	<b>Sampled:</b> 02/13/26	<b>Prep:</b> EPA 3510C
<b>Matrix:</b> Water	<b>Received:</b> 02/13/26	<b>Analysis:</b> EPA 8081A
<b>DF:</b> 0.9479	<b>Prepared:</b> 02/14/26	<b>Analyst:</b> HQN

553152-001 Analyte	Result	RL	MDL	Units
alpha-BHC	ND	0.05	0.009	ug/L
beta-BHC	ND	0.05	0.01	ug/L
gamma-BHC	ND	0.05	0.008	ug/L
delta-BHC	ND	0.05	0.01	ug/L
Heptachlor	ND	0.05	0.01	ug/L
Aldrin	ND	0.05	0.01	ug/L
Heptachlor epoxide	ND	0.05	0.009	ug/L
Endosulfan I	ND	0.05	0.01	ug/L
Dieldrin	ND	0.09	0.01	ug/L
4,4'-DDE	ND	0.09	0.01	ug/L
Endrin	ND	0.09	0.01	ug/L
Endosulfan II	ND	0.09	0.02	ug/L
Endosulfan sulfate	ND	0.09	0.01	ug/L
4,4'-DDD	ND	0.09	0.01	ug/L
Endrin aldehyde	ND	0.09	0.02	ug/L
Endrin ketone	ND	0.09	0.02	ug/L
4,4'-DDT	ND	0.09	0.03	ug/L
Methoxychlor	ND	0.09	0.03	ug/L
Toxaphene	ND	1.9	0.4	ug/L
Chlordane (Technical)	ND	0.9	0.2	ug/L

553152-001 Surrogate	%REC	Limits
TCMX	72	29-120
Decachlorobiphenyl	74	33-132

Legend

- MDL:** Method Detection Limit
- ND:** Not Detected at or above MDL
- RL:** Reporting Limit

## Organochlorine Pesticides

<b>Lab #:</b> 553152	<b>Project#:</b> CCLF STORMWATER	
<b>Client:</b> Waste Connections	<b>Location:</b> Stormwater Outlet	
<b>Field ID:</b> SOUTH BASIN - S CENTRAL	<b>Batch#:</b> 395405	<b>Analyzed:</b> 02/14/26
<b>Lab ID:</b> 553152-002	<b>Sampled:</b> 02/13/26	<b>Prep:</b> EPA 3510C
<b>Matrix:</b> Water	<b>Received:</b> 02/13/26	<b>Analysis:</b> EPA 8081A
<b>DF:</b> 0.9434	<b>Prepared:</b> 02/14/26	<b>Analyst:</b> HQN

553152-002 Analyte	Result	RL	MDL	Units
alpha-BHC	ND	0.05	0.009	ug/L
beta-BHC	ND	0.05	0.01	ug/L
gamma-BHC	ND	0.05	0.008	ug/L
delta-BHC	ND	0.05	0.01	ug/L
Heptachlor	ND	0.05	0.01	ug/L
Aldrin	ND	0.05	0.01	ug/L
Heptachlor epoxide	ND	0.05	0.009	ug/L
Endosulfan I	ND	0.05	0.01	ug/L
Dieldrin	ND	0.09	0.01	ug/L
4,4'-DDE	ND	0.09	0.01	ug/L
Endrin	ND	0.09	0.01	ug/L
Endosulfan II	ND	0.09	0.02	ug/L
Endosulfan sulfate	ND	0.09	0.01	ug/L
4,4'-DDD	ND	0.09	0.01	ug/L
Endrin aldehyde	ND	0.09	0.02	ug/L
Endrin ketone	ND	0.09	0.02	ug/L
4,4'-DDT	ND	0.09	0.03	ug/L
Methoxychlor	ND	0.09	0.03	ug/L
Toxaphene	ND	1.9	0.4	ug/L
Chlordane (Technical)	ND	0.9	0.2	ug/L

553152-002 Surrogate	%REC	Limits
TCMX	74	29-120
Decachlorobiphenyl	76	33-132

Legend

- MDL:** Method Detection Limit
- ND:** Not Detected at or above MDL
- RL:** Reporting Limit

## Organochlorine Pesticides

<b>Lab #:</b> 553152	<b>Project#:</b> CCLF STORMWATER	
<b>Client:</b> Waste Connections	<b>Location:</b> Stormwater Outlet	
<b>Field ID:</b> SOUTH BASIN - W CENTRAL	<b>Batch#:</b> 395405	<b>Analyzed:</b> 02/14/26
<b>Lab ID:</b> 553152-003	<b>Sampled:</b> 02/13/26	<b>Prep:</b> EPA 3510C
<b>Matrix:</b> Water	<b>Received:</b> 02/13/26	<b>Analysis:</b> EPA 8081A
<b>DF:</b> 0.9390	<b>Prepared:</b> 02/14/26	<b>Analyst:</b> HQN

553152-003 Analyte	Result	RL	MDL	Units
alpha-BHC	ND	0.05	0.009	ug/L
beta-BHC	ND	0.05	0.01	ug/L
gamma-BHC	ND	0.05	0.008	ug/L
delta-BHC	ND	0.05	0.01	ug/L
Heptachlor	ND	0.05	0.01	ug/L
Aldrin	ND	0.05	0.01	ug/L
Heptachlor epoxide	ND	0.05	0.009	ug/L
Endosulfan I	ND	0.05	0.01	ug/L
Dieldrin	ND	0.09	0.01	ug/L
4,4'-DDE	ND	0.09	0.01	ug/L
Endrin	ND	0.09	0.01	ug/L
Endosulfan II	ND	0.09	0.02	ug/L
Endosulfan sulfate	ND	0.09	0.01	ug/L
4,4'-DDD	ND	0.09	0.01	ug/L
Endrin aldehyde	ND	0.09	0.02	ug/L
Endrin ketone	ND	0.09	0.02	ug/L
4,4'-DDT	ND	0.09	0.03	ug/L
Methoxychlor	ND	0.09	0.03	ug/L
Toxaphene	ND	1.9	0.4	ug/L
Chlordane (Technical)	ND	0.9	0.2	ug/L

553152-003 Surrogate	%REC	Limits
TCMX	76	29-120
Decachlorobiphenyl	82	33-132

Legend

- MDL:** Method Detection Limit
- ND:** Not Detected at or above MDL
- RL:** Reporting Limit

## Total Organic Carbon by High-Temperature

<b>Lab #:</b> 553152	<b>Project#:</b> CCLF STORMWATER	
<b>Client:</b> Waste Connections	<b>Location:</b> Stormwater Outlet	
<b>Field ID:</b> SOUTH BASIN - NW CORNER	<b>Batch#:</b> 395353	<b>Prep:</b> SM 5310B
<b>Type:</b> SAMPLE	<b>Sampled:</b> 02/13/26	<b>Analysis:</b> SM 5310B
<b>Lab ID:</b> 553152-001	<b>Received:</b> 02/13/26	<b>Analyst:</b> ARM
<b>Matrix:</b> Water	<b>Prepared:</b> 02/13/26	
<b>DF:</b> 1.000	<b>Analyzed:</b> 02/13/26	

553152-001 Analyte	Result	RL	MDL	Units
<b>Total Organic Carbon</b>	<b>30</b>	1.0	0.49	mg/L

<b>Field ID:</b> SOUTH BASIN - S CENTRAL	<b>Batch#:</b> 395353	
<b>Type:</b> SAMPLE	<b>Sampled:</b> 02/13/26	
<b>Lab ID:</b> 553152-002	<b>Received:</b> 02/13/26	
<b>Matrix:</b> Water	<b>Prepared:</b> 02/13/26	
<b>DF:</b> 1.000	<b>Analyzed:</b> 02/13/26	
	<b>Prep:</b> SM 5310B	
	<b>Analysis:</b> SM 5310B	
	<b>Analyst:</b> ARM	

553152-002 Analyte	Result	RL	MDL	Units
<b>Total Organic Carbon</b>	<b>36</b>	1.0	0.49	mg/L

<b>Field ID:</b> SOUTH BASIN - W CENTRAL	<b>Batch#:</b> 395353	
<b>Type:</b> SAMPLE	<b>Sampled:</b> 02/13/26	
<b>Lab ID:</b> 553152-003	<b>Received:</b> 02/13/26	
<b>Matrix:</b> Water	<b>Prepared:</b> 02/13/26	
<b>DF:</b> 1.000	<b>Analyzed:</b> 02/13/26	
	<b>Prep:</b> SM 5310B	
	<b>Analysis:</b> SM 5310B	
	<b>Analyst:</b> ARM	

553152-003 Analyte	Result	RL	MDL	Units
<b>Total Organic Carbon</b>	<b>30</b>	1.0	0.49	mg/L

<b>Type:</b> BLANK	<b>Batch#:</b> 395353	<b>Analysis:</b> SM 5310B
<b>Lab ID:</b> QC1340552	<b>Prepared:</b> 02/13/26	<b>Analyst:</b> ARM
<b>Matrix:</b> Water	<b>Analyzed:</b> 02/13/26	
<b>DF:</b> 1.000	<b>Prep:</b> SM 5310B	

QC1340552 Analyte	Result	RL	MDL	Units
<b>Total Organic Carbon</b>	<b>ND</b>	1.0	0.49	mg/L

Legend  
**MDL:** Method Detection Limit  
**ND:** Not Detected at or above MDL  
**RL:** Reporting Limit

## Polychlorinated Biphenyls (PCBs)

<b>Lab #:</b> 553152	<b>Project#:</b> CCLF STORMWATER	
<b>Client:</b> Waste Connections	<b>Location:</b> Stormwater Outlet	
<b>Field ID:</b> SOUTH BASIN - NW CORNER	<b>Batch#:</b> 395405	<b>Analyzed:</b> 02/14/26
<b>Lab ID:</b> 553152-001	<b>Sampled:</b> 02/13/26	<b>Prep:</b> EPA 3510C
<b>Matrix:</b> Water	<b>Received:</b> 02/13/26	<b>Analysis:</b> EPA 8082
<b>DF:</b> 0.9479	<b>Prepared:</b> 02/14/26	<b>Analyst:</b> HQN

553152-001 Analyte	Result	RL	MDL	Units
Aroclor-1016	ND	0.47	0.29	ug/L
Aroclor-1221	ND	0.47	0.44	ug/L
Aroclor-1232	ND	0.47	0.26	ug/L
Aroclor-1242	ND	0.47	0.27	ug/L
Aroclor-1248	ND	0.47	0.22	ug/L
Aroclor-1254	ND	0.47	0.25	ug/L
Aroclor-1260	ND	0.47	0.31	ug/L
Aroclor-1262	ND	0.47	0.28	ug/L
Aroclor-1268	ND	0.47	0.25	ug/L

553152-001 Surrogate	%REC	Limits
Decachlorobiphenyl (PCB)	62	28-138

Legend

- MDL:** Method Detection Limit
- ND:** Not Detected at or above MDL
- RL:** Reporting Limit

## Polychlorinated Biphenyls (PCBs)

<b>Lab #:</b> 553152	<b>Project#:</b> CCLF STORMWATER	
<b>Client:</b> Waste Connections	<b>Location:</b> Stormwater Outlet	
<b>Field ID:</b> SOUTH BASIN - S CENTRAL	<b>Batch#:</b> 395405	<b>Analyzed:</b> 02/14/26
<b>Lab ID:</b> 553152-002	<b>Sampled:</b> 02/13/26	<b>Prep:</b> EPA 3510C
<b>Matrix:</b> Water	<b>Received:</b> 02/13/26	<b>Analysis:</b> EPA 8082
<b>DF:</b> 0.9434	<b>Prepared:</b> 02/14/26	<b>Analyst:</b> HQN

553152-002 Analyte	Result	RL	MDL	Units
Aroclor-1016	ND	0.47	0.29	ug/L
Aroclor-1221	ND	0.47	0.44	ug/L
Aroclor-1232	ND	0.47	0.26	ug/L
Aroclor-1242	ND	0.47	0.27	ug/L
Aroclor-1248	ND	0.47	0.22	ug/L
Aroclor-1254	ND	0.47	0.25	ug/L
Aroclor-1260	ND	0.47	0.31	ug/L
Aroclor-1262	ND	0.47	0.28	ug/L
Aroclor-1268	ND	0.47	0.24	ug/L

553152-002 Surrogate	%REC	Limits
Decachlorobiphenyl (PCB)	63	28-138

Legend

- MDL:** Method Detection Limit
- ND:** Not Detected at or above MDL
- RL:** Reporting Limit

## Polychlorinated Biphenyls (PCBs)

<b>Lab #:</b> 553152	<b>Project#:</b> CCLF STORMWATER	
<b>Client:</b> Waste Connections	<b>Location:</b> Stormwater Outlet	
<b>Field ID:</b> SOUTH BASIN - W CENTRAL	<b>Batch#:</b> 395405	<b>Analyzed:</b> 02/14/26
<b>Lab ID:</b> 553152-003	<b>Sampled:</b> 02/13/26	<b>Prep:</b> EPA 3510C
<b>Matrix:</b> Water	<b>Received:</b> 02/13/26	<b>Analysis:</b> EPA 8082
<b>DF:</b> 0.9390	<b>Prepared:</b> 02/14/26	<b>Analyst:</b> HQN

553152-003 Analyte	Result	RL	MDL	Units
Aroclor-1016	ND	0.47	0.28	ug/L
Aroclor-1221	ND	0.47	0.44	ug/L
Aroclor-1232	ND	0.47	0.25	ug/L
Aroclor-1242	ND	0.47	0.27	ug/L
Aroclor-1248	ND	0.47	0.22	ug/L
Aroclor-1254	ND	0.47	0.25	ug/L
Aroclor-1260	ND	0.47	0.31	ug/L
Aroclor-1262	ND	0.47	0.27	ug/L
Aroclor-1268	ND	0.47	0.24	ug/L

553152-003 Surrogate	%REC	Limits
Decachlorobiphenyl (PCB)	67	28-138

Legend

- MDL:** Method Detection Limit
- ND:** Not Detected at or above MDL
- RL:** Reporting Limit

## Metals Analytical Report

<b>Lab #:</b> 553152	<b>Project#:</b> CCLF STORMWATER	
<b>Client:</b> Waste Connections	<b>Location:</b> Stormwater Outlet	
<b>Field ID:</b> SOUTH BASIN - NW CORNER	<b>DF:</b> 1.000	<b>Prepared:</b> 02/13/26
<b>Type:</b> SAMPLE	<b>Batch#:</b> 395362	<b>Prep:</b> EPA 3015A
<b>Lab ID:</b> 553152-001	<b>Sampled:</b> 02/13/26	<b>Analysis:</b> EPA 200.7
<b>Matrix:</b> Water	<b>Received:</b> 02/13/26	<b>Analyst:</b> TWJ

553152-001 Analyte	Result	RL	MDL	Units	Analyzed
Calcium	66	0.10	0.022	mg/L	02/14/26
Iron	4.8	0.050	0.017	mg/L	02/15/26
Magnesium	10	0.10	0.010	mg/L	02/14/26
Potassium	12	0.50	0.15	mg/L	02/14/26
Sodium	76	0.50	0.017	mg/L	02/14/26

<b>Field ID:</b> SOUTH BASIN - S CENTRAL	<b>DF:</b> 1.000	
<b>Type:</b> SAMPLE	<b>Batch#:</b> 395362	
<b>Lab ID:</b> 553152-002	<b>Sampled:</b> 02/13/26	
<b>Matrix:</b> Water	<b>Received:</b> 02/13/26	
	<b>Prepared:</b> 02/13/26	
	<b>Prep:</b> EPA 3015A	
	<b>Analysis:</b> EPA 200.7	
	<b>Analyst:</b> TWJ	

553152-002 Analyte	Result	RL	MDL	Units	Analyzed
Calcium	100	0.10	0.022	mg/L	02/14/26
Iron	23	0.050	0.017	mg/L	02/15/26
Magnesium	19	0.10	0.010	mg/L	02/14/26
Potassium	22	0.50	0.15	mg/L	02/14/26
Sodium	83	0.50	0.017	mg/L	02/14/26

<b>Field ID:</b> SOUTH BASIN - W CENTRAL	<b>DF:</b> 1.000	
<b>Type:</b> SAMPLE	<b>Batch#:</b> 395362	
<b>Lab ID:</b> 553152-003	<b>Sampled:</b> 02/13/26	
<b>Matrix:</b> Water	<b>Received:</b> 02/13/26	
	<b>Prepared:</b> 02/13/26	
	<b>Prep:</b> EPA 3015A	
	<b>Analysis:</b> EPA 200.7	
	<b>Analyst:</b> TWJ	

553152-003 Analyte	Result	RL	MDL	Units	Analyzed
Calcium	65	0.10	0.022	mg/L	02/14/26
Iron	2.0	0.050	0.017	mg/L	02/15/26
Magnesium	10	0.10	0.010	mg/L	02/14/26
Potassium	14	0.50	0.15	mg/L	02/14/26
Sodium	78	0.50	0.017	mg/L	02/14/26

<b>Type:</b> BLANK	<b>DF:</b> 1.000	
<b>Lab ID:</b> QC1340600	<b>Batch#:</b> 395362	
<b>Matrix:</b> Water	<b>Prepared:</b> 02/13/26	
	<b>Prep:</b> EPA 3015A	
	<b>Analysis:</b> EPA 200.7	
	<b>Analyst:</b> TWJ	

QC1340600 Analyte	Result	RL	MDL	Units	Analyzed
Calcium	ND	0.10	0.022	mg/L	02/14/26
Iron	ND	0.050	0.017	mg/L	02/15/26
Magnesium	ND	0.10	0.010	mg/L	02/14/26
Potassium	ND	0.50	0.15	mg/L	02/14/26
Sodium	ND	0.50	0.017	mg/L	02/14/26

Legend

- MDL:** Method Detection Limit
- ND:** Not Detected at or above MDL
- RL:** Reporting Limit

## Metals Analytical Report

<b>Lab #:</b> 553152	<b>Project#:</b> CCLF STORMWATER	
<b>Client:</b> Waste Connections	<b>Location:</b> Stormwater Outlet	
<b>Field ID:</b> SOUTH BASIN - NW CORNER	<b>Batch#:</b> 395413	<b>Analyzed:</b> 02/15/26
<b>Lab ID:</b> 553152-001	<b>Sampled:</b> 02/13/26	<b>Prep:</b> EPA 3015A
<b>Matrix:</b> Water	<b>Received:</b> 02/13/26	<b>Analysis:</b> EPA 200.8
<b>DF:</b> 1.000	<b>Prepared:</b> 02/14/26	<b>Analyst:</b> KCD

553152-001 Analyte	Result	RL	MDL	Units	Qual
<b>Antimony</b>	2.1	2.0	1.0	ug/L	
<b>Arsenic</b>	6.8	2.0	0.27	ug/L	
<b>Barium</b>	57	5.0	0.44	ug/L	
<b>Beryllium</b>	0.32 J	1.0	0.060	ug/L	B
Boron	NA				
Cadmium	ND	1.0	0.072	ug/L	
<b>Chromium</b>	6.4	5.0	0.43	ug/L	
<b>Cobalt</b>	2.5	1.0	0.090	ug/L	
<b>Copper</b>	12	3.0	0.96	ug/L	
<b>Lead</b>	2.3 J	5.0	0.23	ug/L	
<b>Manganese</b>	87	10	3.8	ug/L	
<b>Nickel</b>	6.4	5.0	1.3	ug/L	
<b>Selenium</b>	4.2	4.0	1.9	ug/L	
Silver	ND	5.0	0.37	ug/L	
Thallium	ND	1.0	0.25	ug/L	
Tin	ND	5.0	1.5	ug/L	
<b>Vanadium</b>	14	5.0	0.36	ug/L	
<b>Zinc</b>	15	10	7.6	ug/L	

Legend

- NA:** Not Analyzed
- B:** Contamination found in associated Method Blank
- J:** Estimated value
- MDL:** Method Detection Limit
- ND:** Not Detected at or above MDL
- RL:** Reporting Limit

## Metals Analytical Report

<b>Lab #:</b> 553152	<b>Project#:</b> CCLF STORMWATER	
<b>Client:</b> Waste Connections	<b>Location:</b> Stormwater Outlet	
<b>Field ID:</b> SOUTH BASIN - NW CORNER	<b>Batch#:</b> 395394	<b>Prep:</b> EPA 245.1
<b>Type:</b> SAMPLE	<b>Sampled:</b> 02/13/26	<b>Analysis:</b> EPA 245.1
<b>Lab ID:</b> 553152-001	<b>Received:</b> 02/13/26	<b>Analyst:</b> KCD
<b>Matrix:</b> Water	<b>Prepared:</b> 02/14/26	
<b>DF:</b> 1.000	<b>Analyzed:</b> 02/14/26	

553152-001 Analyte	Result	RL	MDL	Units
Mercury	ND	0.40	0.091	ug/L

<b>Field ID:</b> SOUTH BASIN - S CENTRAL	<b>Batch#:</b> 395394	<b>Prep:</b> EPA 245.1
<b>Type:</b> SAMPLE	<b>Sampled:</b> 02/13/26	<b>Analysis:</b> EPA 245.1
<b>Lab ID:</b> 553152-002	<b>Received:</b> 02/13/26	<b>Analyst:</b> KCD
<b>Matrix:</b> Water	<b>Prepared:</b> 02/14/26	
<b>DF:</b> 1.000	<b>Analyzed:</b> 02/14/26	

553152-002 Analyte	Result	RL	MDL	Units
Mercury	0.12 J	0.40	0.091	ug/L

<b>Field ID:</b> SOUTH BASIN - W CENTRAL	<b>Batch#:</b> 395394	<b>Prep:</b> EPA 245.1
<b>Type:</b> SAMPLE	<b>Sampled:</b> 02/13/26	<b>Analysis:</b> EPA 245.1
<b>Lab ID:</b> 553152-003	<b>Received:</b> 02/13/26	<b>Analyst:</b> KCD
<b>Matrix:</b> Water	<b>Prepared:</b> 02/14/26	
<b>DF:</b> 1.000	<b>Analyzed:</b> 02/14/26	

553152-003 Analyte	Result	RL	MDL	Units
Mercury	ND	0.40	0.091	ug/L

<b>Type:</b> BLANK	<b>Batch#:</b> 395394	<b>Analysis:</b> EPA 245.1
<b>Lab ID:</b> QC1340688	<b>Prepared:</b> 02/14/26	<b>Analyst:</b> KCD
<b>Matrix:</b> Water	<b>Analyzed:</b> 02/14/26	
<b>DF:</b> 1.000	<b>Prep:</b> EPA 245.1	

QC1340688 Analyte	Result	RL	MDL	Units
Mercury	ND	0.40	0.091	ug/L

- Legend
- J:** Estimated value
  - MDL:** Method Detection Limit
  - ND:** Not Detected at or above MDL
  - RL:** Reporting Limit

## Metals Analytical Report

<b>Lab #:</b> 553152	<b>Project#:</b> CCLF STORMWATER	
<b>Client:</b> Waste Connections	<b>Location:</b> Stormwater Outlet	
<b>Field ID:</b> SOUTH BASIN - S CENTRAL	<b>Batch#:</b> 395413	<b>Analyzed:</b> 02/15/26
<b>Lab ID:</b> 553152-002	<b>Sampled:</b> 02/13/26	<b>Prep:</b> EPA 3015A
<b>Matrix:</b> Water	<b>Received:</b> 02/13/26	<b>Analysis:</b> EPA 200.8
<b>DF:</b> 1.000	<b>Prepared:</b> 02/14/26	<b>Analyst:</b> KCD

553152-002 Analyte	Result	RL	MDL	Units	Qual
Antimony	1.7 J	2.0	1.0	ug/L	
Arsenic	12	2.0	0.27	ug/L	
Barium	230	5.0	0.44	ug/L	
Beryllium	1.1	1.0	0.060	ug/L	B
Boron	NA	^			
Cadmium	0.40 J	1.0	0.072	ug/L	
Chromium	23	5.0	0.43	ug/L	
Cobalt	12	1.0	0.090	ug/L	
Copper	35	3.0	0.96	ug/L	
Lead	20	5.0	0.23	ug/L	
Manganese	410	10	3.8	ug/L	
Nickel	23	5.0	1.3	ug/L	
Selenium	5.3	4.0	1.9	ug/L	
Silver	ND	5.0	0.37	ug/L	
Thallium	ND	1.0	0.25	ug/L	
Tin	ND	5.0	1.5	ug/L	
Vanadium	47	5.0	0.36	ug/L	
Zinc	110	10	7.6	ug/L	

Legend

- NA:** Not Analyzed
- B:** Contamination found in associated Method Blank
- J:** Estimated value
- MDL:** Method Detection Limit
- ND:** Not Detected at or above MDL
- RL:** Reporting Limit

## Metals Analytical Report

<b>Lab #:</b> 553152	<b>Project#:</b> CCLF STORMWATER	
<b>Client:</b> Waste Connections	<b>Location:</b> Stormwater Outlet	
<b>Field ID:</b> SOUTH BASIN - W CENTRAL	<b>Batch#:</b> 395413	<b>Analyzed:</b> 02/15/26
<b>Lab ID:</b> 553152-003	<b>Sampled:</b> 02/13/26	<b>Prep:</b> EPA 3015A
<b>Matrix:</b> Water	<b>Received:</b> 02/13/26	<b>Analysis:</b> EPA 200.8
<b>DF:</b> 1.000	<b>Prepared:</b> 02/14/26	<b>Analyst:</b> KCD

553152-003 Analyte	Result	RL	MDL	Units	Qual
<b>Antimony</b>	1.7 J	2.0	1.0	ug/L	
<b>Arsenic</b>	6.9	2.0	0.27	ug/L	
<b>Barium</b>	43	5.0	0.44	ug/L	
<b>Beryllium</b>	0.19 J	1.0	0.060	ug/L	B
Boron	NA				
Cadmium	ND	1.0	0.072	ug/L	
<b>Chromium</b>	4.0 J	5.0	0.43	ug/L	
<b>Cobalt</b>	1.7	1.0	0.090	ug/L	
<b>Copper</b>	10	3.0	0.96	ug/L	
<b>Lead</b>	1.7 J	5.0	0.23	ug/L	
<b>Manganese</b>	53	10	3.8	ug/L	
<b>Nickel</b>	4.9 J	5.0	1.3	ug/L	
<b>Selenium</b>	4.1	4.0	1.9	ug/L	
Silver	ND	5.0	0.37	ug/L	
Thallium	ND	1.0	0.25	ug/L	
Tin	ND	5.0	1.5	ug/L	
<b>Vanadium</b>	10	5.0	0.36	ug/L	
<b>Zinc</b>	12	10	7.6	ug/L	

Legend

- NA:** Not Analyzed
- B:** Contamination found in associated Method Blank
- J:** Estimated value
- MDL:** Method Detection Limit
- ND:** Not Detected at or above MDL
- RL:** Reporting Limit

### Total Oil & Grease (HEM)

<b>Lab #:</b> 553152	<b>Project#:</b> CCLF STORMWATER	
<b>Client:</b> Waste Connections	<b>Location:</b> Stormwater Outlet	
<b>Field ID:</b> SOUTH BASIN - NW CORNER	<b>DF:</b> 0.9804	<b>Analyzed:</b> 02/15/26
<b>Type:</b> SAMPLE	<b>Batch#:</b> 395420	<b>Prep:</b> METHOD
<b>Lab ID:</b> 553152-001	<b>Sampled:</b> 02/13/26	<b>Analysis:</b> EPA 1664A
<b>Matrix:</b> Water	<b>Received:</b> 02/13/26	<b>Analyst:</b> JAG

553152-001 Analyte	Result	RL	MDL	Units
Total Oil and Grease	ND	4.9	0.95	mg/L

<b>Field ID:</b> SOUTH BASIN - S CENTRAL	<b>DF:</b> 0.9901	<b>Analyzed:</b> 02/15/26
<b>Type:</b> SAMPLE	<b>Batch#:</b> 395420	<b>Prep:</b> METHOD
<b>Lab ID:</b> 553152-002	<b>Sampled:</b> 02/13/26	<b>Analysis:</b> EPA 1664A
<b>Matrix:</b> Water	<b>Received:</b> 02/13/26	<b>Analyst:</b> JAG

553152-002 Analyte	Result	RL	MDL	Units
Total Oil and Grease	ND	5.0	0.96	mg/L

<b>Field ID:</b> SOUTH BASIN - W CENTRAL	<b>DF:</b> 0.9852	<b>Analyzed:</b> 02/15/26
<b>Type:</b> SAMPLE	<b>Batch#:</b> 395420	<b>Prep:</b> METHOD
<b>Lab ID:</b> 553152-003	<b>Sampled:</b> 02/13/26	<b>Analysis:</b> EPA 1664A
<b>Matrix:</b> Water	<b>Received:</b> 02/13/26	<b>Analyst:</b> JAG

553152-003 Analyte	Result	RL	MDL	Units
Total Oil and Grease	ND	4.9	0.96	mg/L

<b>Type:</b> BLANK	<b>DF:</b> 1.000	<b>Prep:</b> METHOD
<b>Lab ID:</b> QC1340801	<b>Batch#:</b> 395420	<b>Analysis:</b> EPA 1664A
<b>Matrix:</b> Water	<b>Analyzed:</b> 02/15/26	<b>Analyst:</b> JAG

QC1340801 Analyte	Result	RL	MDL	Units
Total Oil and Grease	ND	5.0	0.97	mg/L

Legend  
**MDL:** Method Detection Limit  
**ND:** Not Detected at or above MDL  
**RL:** Reporting Limit

## Alkalinity

<b>Lab #:</b> 553152	<b>Project#:</b> CCLF STORMWATER	
<b>Client:</b> Waste Connections	<b>Location:</b> Stormwater Outlet	
<b>Field ID:</b> SOUTH BASIN - NW CORNER	<b>DF:</b> 2.500	<b>Analyzed:</b> 02/13/26
<b>Type:</b> SAMPLE	<b>Batch#:</b> 395344	<b>Prep:</b> METHOD
<b>Lab ID:</b> 553152-001	<b>Sampled:</b> 02/13/26	<b>Analysis:</b> SM2320B
<b>Matrix:</b> Water	<b>Received:</b> 02/13/26	<b>Analyst:</b> WWC

553152-001 Analyte	Result	RL	Units
Bicarbonate	140	6.0	mg/L
Alkalinity, Total as CaCO3	130	5.0	mg/L

<b>Field ID:</b> SOUTH BASIN - S CENTRAL	<b>DF:</b> 2.500	
<b>Type:</b> SAMPLE	<b>Batch#:</b> 395344	
<b>Lab ID:</b> 553152-002	<b>Sampled:</b> 02/13/26	
<b>Matrix:</b> Water	<b>Received:</b> 02/13/26	
	<b>Analyzed:</b> 02/13/26	
	<b>Prep:</b> METHOD	
	<b>Analysis:</b> SM2320B	
	<b>Analyst:</b> WWC	

553152-002 Analyte	Result	RL	Units
Bicarbonate	200	6.0	mg/L
Alkalinity, Total as CaCO3	190	5.0	mg/L

<b>Field ID:</b> SOUTH BASIN - W CENTRAL	<b>DF:</b> 2.500	
<b>Type:</b> SAMPLE	<b>Batch#:</b> 395344	
<b>Lab ID:</b> 553152-003	<b>Sampled:</b> 02/13/26	
<b>Matrix:</b> Water	<b>Received:</b> 02/13/26	
	<b>Analyzed:</b> 02/13/26	
	<b>Prep:</b> METHOD	
	<b>Analysis:</b> SM2320B	
	<b>Analyst:</b> WWC	

553152-003 Analyte	Result	RL	Units
Bicarbonate	130	6.0	mg/L
Alkalinity, Total as CaCO3	150	5.0	mg/L

<b>Type:</b> BLANK	<b>DF:</b> 1.000	
<b>Lab ID:</b> QC1340523	<b>Batch#:</b> 395344	
<b>Matrix:</b> Water	<b>Analyzed:</b> 02/13/26	
	<b>Prep:</b> METHOD	
	<b>Analysis:</b> SM2320B	
	<b>Analyst:</b> WWC	

QC1340523 Analyte	Result	RL	Units
Bicarbonate	ND	2.0	mg/L
Alkalinity, Total as CaCO3	ND	2.0	mg/L

Legend  
**ND:** Not Detected  
**RL:** Reporting Limit

## Chemical Oxygen Demand

<b>Lab #:</b> 553152	<b>Project#:</b> CCLF STORMWATER
<b>Client:</b> Waste Connections	<b>Location:</b> Stormwater Outlet

<b>Field ID:</b> SOUTH BASIN - NW CORNER	<b>Batch#:</b> 395376	<b>Prep:</b> SM 5220D
<b>Type:</b> SAMPLE	<b>Sampled:</b> 02/13/26	<b>Analysis:</b> SM5220D
<b>Lab ID:</b> 553152-001	<b>Received:</b> 02/13/26	<b>Analyst:</b> ARM
<b>Matrix:</b> Water	<b>Prepared:</b> 02/14/26	
<b>DF:</b> 1.000	<b>Analyzed:</b> 02/14/26	

553152-001 Analyte	Result	RL	MDL	Units
Chemical Oxygen Demand	80	4.0	2.0	mg/L

<b>Field ID:</b> SOUTH BASIN - S CENTRAL	<b>Batch#:</b> 395376	<b>Prep:</b> SM 5220D
<b>Type:</b> SAMPLE	<b>Sampled:</b> 02/13/26	<b>Analysis:</b> SM5220D
<b>Lab ID:</b> 553152-002	<b>Received:</b> 02/13/26	<b>Analyst:</b> ARM
<b>Matrix:</b> Water	<b>Prepared:</b> 02/14/26	
<b>DF:</b> 1.000	<b>Analyzed:</b> 02/14/26	

553152-002 Analyte	Result	RL	MDL	Units
Chemical Oxygen Demand	87	4.0	2.0	mg/L

<b>Field ID:</b> SOUTH BASIN - W CENTRAL	<b>Batch#:</b> 395376	<b>Prep:</b> SM 5220D
<b>Type:</b> SAMPLE	<b>Sampled:</b> 02/13/26	<b>Analysis:</b> SM5220D
<b>Lab ID:</b> 553152-003	<b>Received:</b> 02/13/26	<b>Analyst:</b> ARM
<b>Matrix:</b> Water	<b>Prepared:</b> 02/14/26	
<b>DF:</b> 1.000	<b>Analyzed:</b> 02/14/26	

553152-003 Analyte	Result	RL	MDL	Units
Chemical Oxygen Demand	92	4.0	2.0	mg/L

<b>Type:</b> BLANK	<b>Batch#:</b> 395376	<b>Analysis:</b> SM5220D
<b>Lab ID:</b> QC1340639	<b>Prepared:</b> 02/14/26	<b>Analyst:</b> ARM
<b>Matrix:</b> Water	<b>Analyzed:</b> 02/14/26	
<b>DF:</b> 1.000	<b>Prep:</b> SM 5220D	

QC1340639 Analyte	Result	RL	MDL	Units
Chemical Oxygen Demand	ND	4.0	2.0	mg/L

Legend

**MDL:** Method Detection Limit

**ND:** Not Detected at or above MDL

**RL:** Reporting Limit

## Conductivity

<b>Lab #:</b> 553152	<b>Project#:</b> CCLF STORMWATER		
<b>Client:</b> Waste Connections	<b>Location:</b> Stormwater Outlet		
<b>Field ID:</b> SOUTH BASIN - NW CORNER	<b>Batch#:</b> 395357	<b>Prep:</b> METHOD	
<b>Lab ID:</b> 553152-001	<b>Sampled:</b> 02/13/26	<b>Analysis:</b> SM2510B	
<b>Matrix:</b> Water	<b>Received:</b> 02/13/26	<b>Analyst:</b> CDR	
<b>DF:</b> 1.000	<b>Analyzed:</b> 02/13/26		
<hr/>			
<b>553152-001 Analyte</b>	<b>Result</b>	<b>RL</b>	<b>Units</b>
<b>Specific Conductance</b>	<b>770</b>	1.0	umhos/cm
<hr/>			
<b>Field ID:</b> SOUTH BASIN - S CENTRAL	<b>Batch#:</b> 395357	<b>Prep:</b> METHOD	
<b>Lab ID:</b> 553152-002	<b>Sampled:</b> 02/13/26	<b>Analysis:</b> SM2510B	
<b>Matrix:</b> Water	<b>Received:</b> 02/13/26	<b>Analyst:</b> CDR	
<b>DF:</b> 1.000	<b>Analyzed:</b> 02/13/26		
<hr/>			
<b>553152-002 Analyte</b>	<b>Result</b>	<b>RL</b>	<b>Units</b>
<b>Specific Conductance</b>	<b>860</b>	1.0	umhos/cm
<hr/>			
<b>Field ID:</b> SOUTH BASIN - W CENTRAL	<b>Batch#:</b> 395357	<b>Prep:</b> METHOD	
<b>Lab ID:</b> 553152-003	<b>Sampled:</b> 02/13/26	<b>Analysis:</b> SM2510B	
<b>Matrix:</b> Water	<b>Received:</b> 02/13/26	<b>Analyst:</b> CDR	
<b>DF:</b> 1.000	<b>Analyzed:</b> 02/13/26		
<hr/>			
<b>553152-003 Analyte</b>	<b>Result</b>	<b>RL</b>	<b>Units</b>
<b>Specific Conductance</b>	<b>780</b>	1.0	umhos/cm

Legend

RL: Reporting Limit

## Sulfide

<b>Lab #:</b> 553152	<b>Project#:</b> CCLF STORMWATER			
<b>Client:</b> Waste Connections	<b>Location:</b> Stormwater Outlet			
<b>Field ID:</b> SOUTH BASIN - NW CORNER	<b>DF:</b> 1.000	<b>Analyzed:</b> 02/13/26		
<b>Type:</b> SAMPLE	<b>Batch#:</b> 395371	<b>Prep:</b> METHOD		
<b>Lab ID:</b> 553152-001	<b>Sampled:</b> 02/13/26	<b>Analysis:</b> SM 4500-S2-D		
<b>Matrix:</b> Water	<b>Received:</b> 02/13/26	<b>Analyst:</b> TXC		
<b>553152-001 Analyte</b>		<b>Result</b>	<b>RL</b>	<b>Units</b>
Sulfide		ND	0.10	mg/L
<b>Field ID:</b> SOUTH BASIN - S CENTRAL	<b>DF:</b> 1.000	<b>Analyzed:</b> 02/13/26		
<b>Type:</b> SAMPLE	<b>Batch#:</b> 395371	<b>Prep:</b> METHOD		
<b>Lab ID:</b> 553152-002	<b>Sampled:</b> 02/13/26	<b>Analysis:</b> SM 4500-S2-D		
<b>Matrix:</b> Water	<b>Received:</b> 02/13/26	<b>Analyst:</b> TXC		
<b>553152-002 Analyte</b>		<b>Result</b>	<b>RL</b>	<b>Units</b>
Sulfide		ND	0.10	mg/L
<b>Field ID:</b> SOUTH BASIN - W CENTRAL	<b>DF:</b> 1.000	<b>Analyzed:</b> 02/13/26		
<b>Type:</b> SAMPLE	<b>Batch#:</b> 395371	<b>Prep:</b> METHOD		
<b>Lab ID:</b> 553152-003	<b>Sampled:</b> 02/13/26	<b>Analysis:</b> SM 4500-S2-D		
<b>Matrix:</b> Water	<b>Received:</b> 02/13/26	<b>Analyst:</b> TXC		
<b>553152-003 Analyte</b>		<b>Result</b>	<b>RL</b>	<b>Units</b>
Sulfide		ND	0.10	mg/L
<b>Type:</b> BLANK	<b>DF:</b> 1.000	<b>Prep:</b> METHOD		
<b>Lab ID:</b> QC1340626	<b>Batch#:</b> 395371	<b>Analysis:</b> SM 4500-S2-D		
<b>Matrix:</b> Water	<b>Analyzed:</b> 02/13/26	<b>Analyst:</b> TXC		
<b>QC1340626 Analyte</b>		<b>Result</b>	<b>RL</b>	<b>Units</b>
Sulfide		ND	0.10	mg/L

Legend

**ND:** Not Detected

**RL:** Reporting Limit

### Total Dissolved Solids (TDS)

<b>Lab #:</b> 553152	<b>Project#:</b> CCLF STORMWATER	
<b>Client:</b> Waste Connections	<b>Location:</b> Stormwater Outlet	
<b>Field ID:</b> SOUTH BASIN - NW CORNER	<b>Batch#:</b> 395339	<b>Prep:</b> METHOD
<b>Type:</b> SAMPLE	<b>Sampled:</b> 02/13/26	<b>Analysis:</b> SM2540C
<b>Lab ID:</b> 553152-001	<b>Received:</b> 02/13/26	<b>Analyst:</b> CDR
<b>Matrix:</b> Water	<b>Prepared:</b> 02/13/26	
<b>DF:</b> 2.000	<b>Analyzed:</b> 02/15/26	

553152-001 Analyte	Result	RL	Units
<b>Total Dissolved Solids</b>	<b>570</b>	20	mg/L

<b>Field ID:</b> SOUTH BASIN - S CENTRAL	<b>Batch#:</b> 395339	<b>Prep:</b> METHOD
<b>Type:</b> SAMPLE	<b>Sampled:</b> 02/13/26	<b>Analysis:</b> SM2540C
<b>Lab ID:</b> 553152-002	<b>Received:</b> 02/13/26	<b>Analyst:</b> CDR
<b>Matrix:</b> Water	<b>Prepared:</b> 02/13/26	
<b>DF:</b> 2.000	<b>Analyzed:</b> 02/15/26	

553152-002 Analyte	Result	RL	Units
<b>Total Dissolved Solids</b>	<b>650</b>	20	mg/L

<b>Field ID:</b> SOUTH BASIN - W CENTRAL	<b>Batch#:</b> 395339	<b>Prep:</b> METHOD
<b>Type:</b> SAMPLE	<b>Sampled:</b> 02/13/26	<b>Analysis:</b> SM2540C
<b>Lab ID:</b> 553152-003	<b>Received:</b> 02/13/26	<b>Analyst:</b> CDR
<b>Matrix:</b> Water	<b>Prepared:</b> 02/13/26	
<b>DF:</b> 2.000	<b>Analyzed:</b> 02/15/26	

553152-003 Analyte	Result	RL	Units
<b>Total Dissolved Solids</b>	<b>560</b>	20	mg/L

<b>Type:</b> BLANK	<b>Batch#:</b> 395339	<b>Analysis:</b> SM2540C
<b>Lab ID:</b> QC1340511	<b>Prepared:</b> 02/13/26	<b>Analyst:</b> CDR
<b>Matrix:</b> Water	<b>Analyzed:</b> 02/15/26	
<b>DF:</b> 1.000	<b>Prep:</b> METHOD	

QC1340511 Analyte	Result	RL	Units
<b>Total Dissolved Solids</b>	ND	10	mg/L

Legend  
 ND: Not Detected  
 RL: Reporting Limit

## Total Phenolics

<b>Lab #:</b> 553152	<b>Project#:</b> CCLF STORMWATER	
<b>Client:</b> Waste Connections	<b>Location:</b> Stormwater Outlet	
<b>Field ID:</b> SOUTH BASIN - NW CORNER	<b>DF:</b> 1.000	<b>Analyzed:</b> 02/13/26
<b>Type:</b> SAMPLE	<b>Batch#:</b> 395317	<b>Prep:</b> METHOD
<b>Lab ID:</b> 553152-001	<b>Sampled:</b> 02/13/26	<b>Analysis:</b> EPA 420.1
<b>Matrix:</b> Water	<b>Received:</b> 02/13/26	<b>Analyst:</b> LVL

553152-001 Analyte	Result	RL	MDL	Units
Total Phenolics	0.011	0.010	0.0056	mg/L

<b>Field ID:</b> SOUTH BASIN - S CENTRAL	<b>DF:</b> 1.000	
<b>Type:</b> SAMPLE	<b>Batch#:</b> 395317	
<b>Lab ID:</b> 553152-002	<b>Sampled:</b> 02/13/26	
<b>Matrix:</b> Water	<b>Received:</b> 02/13/26	
	<b>Analyzed:</b> 02/13/26	
	<b>Prep:</b> METHOD	
	<b>Analysis:</b> EPA 420.1	
	<b>Analyst:</b> LVL	

553152-002 Analyte	Result	RL	MDL	Units
Total Phenolics	ND	0.010	0.0056	mg/L

<b>Field ID:</b> SOUTH BASIN - W CENTRAL	<b>DF:</b> 1.000	
<b>Type:</b> SAMPLE	<b>Batch#:</b> 395317	
<b>Lab ID:</b> 553152-003	<b>Sampled:</b> 02/13/26	
<b>Matrix:</b> Water	<b>Received:</b> 02/13/26	
	<b>Analyzed:</b> 02/13/26	
	<b>Prep:</b> METHOD	
	<b>Analysis:</b> EPA 420.1	
	<b>Analyst:</b> LVL	

553152-003 Analyte	Result	RL	MDL	Units
Total Phenolics	ND	0.010	0.0056	mg/L

<b>Type:</b> BLANK	<b>DF:</b> 1.000	
<b>Lab ID:</b> QC1340433	<b>Batch#:</b> 395317	
<b>Matrix:</b> Water	<b>Analyzed:</b> 02/13/26	
	<b>Prep:</b> METHOD	
	<b>Analysis:</b> EPA 420.1	
	<b>Analyst:</b> LVL	

QC1340433 Analyte	Result	RL	MDL	Units
Total Phenolics	ND	0.010	0.0056	mg/L

Legend  
**MDL:** Method Detection Limit  
**ND:** Not Detected at or above MDL  
**RL:** Reporting Limit

## Total Suspended Solids (TSS)

<b>Lab #:</b> 553152	<b>Project#:</b> CCLF STORMWATER	
<b>Client:</b> Waste Connections	<b>Location:</b> Stormwater Outlet	
<b>Field ID:</b> SOUTH BASIN - NW CORNER	<b>Batch#:</b> 395360	<b>Prep:</b> METHOD
<b>Type:</b> SAMPLE	<b>Sampled:</b> 02/13/26	<b>Analysis:</b> SM2540D
<b>Lab ID:</b> 553152-001	<b>Received:</b> 02/13/26	<b>Analyst:</b> CKN
<b>Matrix:</b> Water	<b>Prepared:</b> 02/13/26	
<b>DF:</b> 1.000	<b>Analyzed:</b> 02/14/26	

553152-001 Analyte	Result	RL	Units
<b>Total Suspended Solids</b>	<b>100</b>	0.5	mg/L

<b>Field ID:</b> SOUTH BASIN - S CENTRAL	<b>Batch#:</b> 395360	
<b>Type:</b> SAMPLE	<b>Sampled:</b> 02/13/26	
<b>Lab ID:</b> 553152-002	<b>Received:</b> 02/13/26	
<b>Matrix:</b> Water	<b>Prepared:</b> 02/13/26	
<b>DF:</b> 1.000	<b>Analyzed:</b> 02/14/26	
	<b>Prep:</b> METHOD	
	<b>Analysis:</b> SM2540D	
	<b>Analyst:</b> CKN	

553152-002 Analyte	Result	RL	Units
<b>Total Suspended Solids</b>	<b>1,400</b>	0.5	mg/L

<b>Field ID:</b> SOUTH BASIN - W CENTRAL	<b>Batch#:</b> 395360	
<b>Type:</b> SAMPLE	<b>Sampled:</b> 02/13/26	
<b>Lab ID:</b> 553152-003	<b>Received:</b> 02/13/26	
<b>Matrix:</b> Water	<b>Prepared:</b> 02/13/26	
<b>DF:</b> 1.000	<b>Analyzed:</b> 02/14/26	
	<b>Prep:</b> METHOD	
	<b>Analysis:</b> SM2540D	
	<b>Analyst:</b> CKN	

553152-003 Analyte	Result	RL	Units
<b>Total Suspended Solids</b>	<b>61</b>	0.5	mg/L

<b>Type:</b> BLANK	<b>Batch#:</b> 395360	<b>Analysis:</b> SM2540D
<b>Lab ID:</b> QC1340590	<b>Prepared:</b> 02/13/26	<b>Analyst:</b> CKN
<b>Matrix:</b> Water	<b>Analyzed:</b> 02/14/26	
<b>DF:</b> 1.000	<b>Prep:</b> METHOD	

QC1340590 Analyte	Result	RL	Units
<b>Total Suspended Solids</b>	ND	0.5	mg/L

Legend  
 ND: Not Detected  
 RL: Reporting Limit

## Turbidity

<b>Lab #:</b> 553152	<b>Project#:</b> CCLF STORMWATER			
<b>Client:</b> Waste Connections	<b>Location:</b> Stormwater Outlet			
<b>Field ID:</b> SOUTH BASIN - NW CORNER	<b>Batch#:</b> 395367	<b>Prep:</b>		
<b>Lab ID:</b> 553152-001	<b>Sampled:</b> 02/13/26 09:03	<b>Analysis:</b> SM2130B		
<b>Matrix:</b> Water	<b>Received:</b> 02/13/26	<b>Analyst:</b> CDR		
<b>DF:</b> 1.000	<b>Analyzed:</b> 02/13/26 19:24			
<b>553152-001 Analyte</b>	<b>Result</b>	<b>RL</b>	<b>MDL</b>	<b>Units</b>
<b>Turbidity</b>	<b>120</b>	0.20	0.12	NTU
<b>Field ID:</b> SOUTH BASIN - S CENTRAL	<b>Batch#:</b> 395367	<b>Prep:</b>		
<b>Lab ID:</b> 553152-002	<b>Sampled:</b> 02/13/26 09:16	<b>Analysis:</b> SM2130B		
<b>Matrix:</b> Water	<b>Received:</b> 02/13/26	<b>Analyst:</b> CDR		
<b>DF:</b> 1.000	<b>Analyzed:</b> 02/13/26 19:24			
<b>553152-002 Analyte</b>	<b>Result</b>	<b>RL</b>	<b>MDL</b>	<b>Units</b>
<b>Turbidity</b>	<b>1,300</b>	0.20	0.12	NTU
<b>Field ID:</b> SOUTH BASIN - W CENTRAL	<b>Batch#:</b> 395367	<b>Prep:</b>		
<b>Lab ID:</b> 553152-003	<b>Sampled:</b> 02/13/26 11:08	<b>Analysis:</b> SM2130B		
<b>Matrix:</b> Water	<b>Received:</b> 02/13/26	<b>Analyst:</b> CDR		
<b>DF:</b> 1.000	<b>Analyzed:</b> 02/13/26 19:24			
<b>553152-003 Analyte</b>	<b>Result</b>	<b>RL</b>	<b>MDL</b>	<b>Units</b>
<b>Turbidity</b>	<b>67</b>	0.20	0.12	NTU

Legend

**MDL:** Method Detection Limit

**RL:** Reporting Limit

# **EXHIBIT 8**

# MCLs, DLRs, and PHGs for Regulated Drinking Water Contaminants

Updated September 2025

The following tables include California’s maximum contaminant levels (MCLs), detection limits for purposes of reporting (DLRs), public health goals (PHGs) from the Office of Environmental Health Hazard Assessment (OEHHA). For comparison, Federal MCLs and Maximum Contaminant Level Goals (MCLGs) from the U.S. EPA are also displayed. Previous MCLs that are no longer effective are shown in *italics*. Regulatory citations refer to Title 22 of the [California Code of Regulations \(22 CCR\)](#) and Title 40 of the [Code of Federal Regulations \(40 CFR\)](#).

This document refers to several units of measurement commonly used in assessing water quality. Concentrations of substances in drinking water are typically expressed in milligrams per liter (mg/L), micrograms per liter (µg/L), nanograms per liter (ng/L), and picocuries per liter (pCi/L). These units help quantify the presence of various chemicals, metals, or radioactive materials. For reference, 1 mg/L equals 1,000 µg/L, and 1 µg/L equals 1,000 ng/L, providing a clear scale for understanding the quantities discussed. Picocuries per liter (pCi/L) measure radioactive material, where 1 pCi/L represents a trillionth of a curie, a standard unit for radioactivity.

## Inorganic Chemicals

The information in the following table can be found in [22 CCR §64431](#) (California MCLs), [22 CCR §64432](#) (California DLRs), [OEHHA’s website](#) (California PHGs), [40 CFR §141.23](#) (U.S. EPA MCLs), and [40 CFR §141.51](#) (U.S. EPA MCLGs). The values in this table are in **units of micrograms per liter (µg/L)** unless otherwise stated.

Inorganic Chemicals	California					U.S. EPA		
	MCL	MCL Effective Date	DLR	PHG	PHG Date	MCL	MCL Effective Date	MCLG
Aluminum	1,000	1989-02-25	50	600	2001	--	--	--
Antimony	6	1994-09-08	6	1	2016	6	1994-01-17	6
Arsenic	10 <i>50</i>	2008-11-28 <i>1977</i>	2	0.004	2004	10 <i>50</i>	2006-01-23 <i>1977-06-24</i>	zero
Asbestos <sup>1</sup>	7	1994-09-08	0.2	7	2003	7	1992-07-30	7

<sup>1</sup> Asbestos units are in million fibers per liter (MFL); for fibers >10 microns long.

Inorganic Chemicals	California					U.S. EPA		
	MCL	MCL Effective Date	DLR	PHG	PHG Date	MCL	MCL Effective Date	MCLG
Barium	1,000	1977	100	2,000	2003	2,000 1,000	1992-07-30 1977-06-24	2000
Beryllium	4	1994-09-08	1	1	2003	4	1994-01-17	4
Cadmium	5 10	1994-09-08 1977	1	0.04	2006	5 10	1992-07-30 1977-06-24	5
Chromium, Hexavalent	10	2024-10-01	0.1	0.02	2011	--	--	--
Chromium, Total	50	1977	10	none <sup>2</sup>	--	100 50	1992-07-30 1997-06-24	100
Cyanide	150 200	2003-06-12 1994-09-08	100	150	1997	200	1994-01-17	200
Fluoride <sup>3</sup>	2,000	1998-04	100	1,000	1997	4,000	1987-10-02	4000
Mercury (inorganic)	2	1977	1	1.2	1999	2	1977-06-24	2
Nickel	100	1994-09-08	10	12	2001	--	Remanded	--
Nitrate (as nitrogen, N)	10,000 as N	1977	400	10,000 as N <sup>4</sup>	2018	10,000	1977-06-24	10 mg/L
Nitrite (as N)	1,000 as N	1994-09-08	400	1,000 as N	2018	1,000	1992-07-30	1 mg/L
Nitrate + Nitrite (as N)	10,000 as N	1994-09-08	--	10,000 as N	2018	10,000	1992-07-30	10,000
Perchlorate	6	2007-10-18	1	1	2015	--	--	--
Selenium	50 10	1994-09-08 1977	5	30	2010	50 10	1992-07-30 1977-06-24	50
Thallium	2	1994-09-08	1	0.1	1999	2	1994-01-17	0.5

<sup>2</sup> In November 2001, OEHHA withdrew the 0.0025 mg/L PHG adopted in 1999.

<sup>3</sup> Standards for systems that fluoridate can be found in [22 CCR 64433.2](#).

<sup>4</sup> The PHG for nitrate can also be expressed as 45 mg/L as NO<sub>3</sub>.

## Volatile Organic Chemicals (VOCs)

The information in the following table can be found in [22 CCR §64444](#) (California MCLs), [22 CCR §64445.1](#) (California DLRs), [OEHHA's website](#) (California PHGs), [40 CFR §141.61](#) (U.S. EPA MCLs), and [40 CFR §141.50](#) (U.S. EPA MCLGs). The values in this table are in **units of micrograms per liter (µg/L)**.

Volatile Organic Chemicals (VOCs)	California					U.S. EPA		
	MCL	MCL Effective Date	DLR	PHG	PHG Date	MCL	MCL Effective Date	MCLG
Benzene	1	1989-02-25	0.5	0.15	2001	5	1989-01-09	zero
Carbon tetrachloride	0.5	1989-04-05	0.5	0.1	2000	5	1989-01-09	zero
1,2-Dichlorobenzene	600	1994-09-08	0.5	600	1997	600	1992-07-30	600
1,4-Dichlorobenzene (p-DCB)	5	1989-04-05	0.5	6	1997	75	1989-01-09	75
1,1-Dichloroethane (1,1-DCA)	5	1990-06-24	0.5	3	2003	--	--	--
1,2-Dichloroethane (1,2-DCA)	0.5	1989-04-05	0.5	0.4	1999	5	1989-01-09	zero
1,1-Dichloroethylene (1,1-DCE)	6	1989-02-25	0.5	10	1999	7	1989-01-09	7
cis-1,2-Dichloroethylene	6	1994-09-08	0.5	13	2018	70	1992-07-30	70
trans-1,2-Dichloroethylene	10	1994-09-08	0.5	50	2018	100	1992-07-30	100
Dichloromethane (Methylene chloride)	5	1994-09-08	0.5	4	2000	5	1994-01-17	zero
1,2-Dichloropropane	5	1990-06-24	0.5	0.5	1999	5	1992-07-30	zero
1,3-Dichloropropene	0.5	1989-02-25	0.5	0.2	1999	--	--	--
Ethylbenzene	300 700 680	2003-06-12 1994-09-08 1989-02-25	0.5	300	1997	700	1992-07-30	700
Methyl tertiary butyl ether (MTBE)	13	2000-05-17	3	13	1999	--	--	--
Monochlorobenzene	70 30	1994-09-08 1989-02-25	0.5	70	2014	100	1992-07-30	100
Styrene	100	1994-09-08	0.5	0.5	2010	100	1992-07-30	100
1,1,2,2-Tetrachloroethane	1	1989-02-25	0.5	0.1	2003	--	--	--
Tetrachloroethylene (PCE)	5	1989-05	0.5	0.06	2001	5	1992-07-30	zero
Toluene	150	1994-09-08	0.5	150	1999	1,000	1992-07-30	1,000

Volatile Organic Chemicals (VOCs)	California					U.S. EPA		
	MCL	MCL Effective Date	DLR	PHG	PHG Date	MCL	MCL Effective Date	MCLG
1,2,4-Trichlorobenzene	5 70	2003-06-12 1994-09-08	0.5	5	1999	70	1994-01-17	70
1,1,1-Trichloroethane (1,1,1-TCA)	200	1989-02-25	0.5	1000	2006	200	1989-01-09	200
1,1,2-Trichloroethane (1,1,2-TCA)	5 32	1994-09-08 1989-04-05	0.5	0.3	2006	5	1994-01-17	3
Trichloroethylene (TCE)	5	1989-02-25	0.5	1.7	2009	5	1989-01-09	zero
Trichlorofluoromethane (Freon 11)	150	1990-06-24	5	1,300	2014	--	--	--
1,1,2-Trichloro-1,2,2-Trifluoroethane (Freon 113)	1,200	1990-06-24	10	4,000	1997	--	--	--
Vinyl chloride	0.5	1989-04-05	0.5	0.05	2000	2	1989-01-09	zero
Xylenes	1,750	1989-02-25	0.5	1,800	1997	10,000	1992-07-30	10,000

### Synthetic Organic Chemicals (SOCs)

The information in the following table can be found in [22 CCR §64444](#) (California MCLs), [22 CCR §64445.1](#) (California DLRs), [OEHHA's website](#) (California PHGs), [40 CFR §141.61](#) (U.S. EPA MCLs), and [40 CFR §141.50](#) (U.S. EPA MCLGs). The values in this table are in **units of micrograms per liter (µg/L)**.

Synthetic Organic Chemicals (SOCs)	California					U.S. EPA		
	MCL	MCL Effective Date	DLR	PHG	PHG Date	MCL	MCL Effective Date	MCLG
Alachlor	2	1994-09-08	1	4	1997	2	1992-07-30	zero
Atrazine	1 3	2003-06-12 1989-04-05	0.5	0.15	1999	3	1992-07-30	3
Bentazon	18	1989-04-05	2	200	1999	--	--	--
Benzo(a)pyrene	0.2	1994-09-08	0.1	0.007	2010	0.2	1994-01-17	zero
Carbofuran	18	1990-06-24	5	0.7	2016	40	1992-07-30	40
Chlordane	0.1	1990-06-24	0.1	0.03	1997	2	1992-07-30	zero

Synthetic Organic Chemicals (SOCs)	California					U.S. EPA		
	MCL	MCL Effective Date	DLR	PHG	PHG Date	MCL	MCL Effective Date	MCLG
Dalapon	200	1994-09-08	10	790	1997	200	1994-01-17	200
1,2-Dibromo-3-chloropropane (DBCP)	0.2 0.1	1991-05-03 1989-07-26	0.01	0.003	2020	0.2	1992-07-30	zero
2,4-Dichlorophenoxyacetic acid (2,4-D)	70 100	1994-09-08 1977	10	20	2009	70 100	1992-07-30 1977-06-24	70
Di(2-ethylhexyl)adipate	400	1994-09-08	5	200	2003	400	1994-01-17	400
Di(2-ethylhexyl)phthalate (DEHP)	4	1990-06-24	3	12	1997	6	1994-01-17	zero
Dinoseb	7	1994-09-08	2	14	1997	7	1994-01-17	7
Diquat	20	1994-09-08	4	6	2016	20	1994-01-17	20
Endothal	100	1994-09-08	45	94	2014	100	1994-01-17	100
Endrin	2 0.2	1994-09-08 1977	0.1	0.3	2016	2 0.2	1994-01-17 1977-06-24	2
Ethylene dibromide (EDB)	0.05 0.02	1994-09-08 1989-02-25	0.02	0.01	2003	0.05	1992-07-30	zero
Glyphosate	700	1990-06-24	25	900	2007	700	1994-01-17	700
Heptachlor	0.01	1990-06-24	0.01	0.008	1999	0.4	1992-07-30	zero
Heptachlor epoxide	0.01	1990-06-24	0.01	0.006	1999	0.2	1992-07-30	zero
Hexachlorobenzene	1	1994-09-08	0.5	0.03	2003	1	1994-01-17	zero
Hexachlorocyclopentadiene	50	1994-09-08	1	2	2014	50	1994-01-17	50
Lindane	0.2 4	1994-09-08 1977	0.2	0.032	1999	0.2 4	1992-07-30 1977	0.2
Methoxychlor	30 40 100	2003-06-12 1994-09-08 1977	10	0.09	2010	40 100	1992-07-30 1977-06-24	40
Molinate	20	1989-04-05	2	1	2008	--	--	--
Oxamyl	50 200	2003-06-12 1994-09-08	20	26	2009	200	1994-01-17	200

Synthetic Organic Chemicals (SOCs)	California					U.S. EPA		
	MCL	MCL Effective Date	DLR	PHG	PHG Date	MCL	MCL Effective Date	MCLG
Pentachlorophenol	1	1994-09-08	0.2	0.3	2009	1	1992-07-30	zero
Picloram	500	1994-09-08	1	166	2016	500	1994-01-17	500
Polychlorinated biphenyls (PCBs)	0.5	1994-09-08	0.5	0.09	2007	0.5	1992-07-30	zero
Simazine	4 10	1994-09-08 1989-04-05	1	4	2001	4	1994-01-17	4
Thiobencarb	70	1989-04-05	1	42	2016	--	--	--
Toxaphene	3 5	1994-09-08 1977	1	0.03	2003	3 5	1992-07-30 1977-06-24	zero
1,2,3-Trichloropropane	0.005	2017-12-14	0.005	0.0007	2009	--	--	--
2,3,7,8-TCDD (dioxin)	0.00003	1994-09-08	$5 \times 10^{-6}$	$5 \times 10^{-8}$	2010	0.00003	1994-01-17	zero
2,4,5-TP (Silvex)	50 10	1994-09-08 1977	1	3	2014	50 10	1992-07-30 1977-06-24	50

## Disinfectant Residuals

Standards for disinfectant residuals are called “Maximum Residual Disinfectant Levels” (MRDLs) instead of MCLs. Similarly, goals are called “Maximum Residual Disinfectant Level Goals” (MRDLGs). The information in the following table can be found in [22 CCR §64533.5](#) (California MRDLs), [40 CFR §141.65](#) (U.S. EPA MRDLs), and [40 CFR §141.54](#) (U.S. EPA MRDLGs). The values in this table are in **units of milligrams per liter (mg/L)**.

Disinfectant Residuals	California					U.S. EPA		
	MRDL	MRDL Effective Date	DLR	PHG	PHG Date	MRDL	MRDL Effective Date	MRDLG
Chlorine	4.0 (as Cl <sub>2</sub> )	2006-06-17	--	--	--	4.0	1999-02-16	4
Chloramines	4.0 (as Cl <sub>2</sub> )	2006-06-17	--	--	--	4.0	1999-02-16	4
Chlorine dioxide	0.8 (as ClO <sub>2</sub> )	2006-06-17	--	--	--	0.8	1999-02-16	0.8

## Disinfection Byproducts

The information in the following table can be found in [22 CCR §64533](#) (California MCLs and DLRs), [OEHHA's website](#) (California PHGs), [40 CFR §141.64](#) (U.S. EPA MCLs), and [40 CFR §141.53](#) (U.S. EPA MCLGs). The values in this table are in **units of micrograms per liter (µg/L)**.

Disinfection Byproducts	California					U.S. EPA		
	MCL	MCL Effective Date	DLR	PHG	PHG Date	MCL	MCL Effective Date	MCLG
Total Trihalomethanes	80 100	2006-06-17 1983-03-14	--	--	--	80 100	2002-01-01 1983-11-29	--
Bromodichloromethane	--	--	1	0.06	2020	--	--	zero
Bromoform	--	--	1	0.5	2020	--	--	zero
Chloroform	--	--	1	0.4	2020	--	--	70
Dibromochloromethane	--	--	1	0.1	2020	--	--	60
Haloacetic Acids (five) (HAA5)	60	2006-06-17	--	--	--	60	2002-01-01	--
Monochloroacetic Acid	--	--	2	53	2022	--	--	70
Dichloroacetic Acid	--	--	1	0.2	2022	--	--	zero
Trichloroacetic Acid	--	--	1	0.1	2022	--	--	20
Monobromoacetic Acid	--	--	1	25	2022	--	--	--
Dibromoacetic Acid	--	--	1	0.03	2022	--	--	--
Bromate	10	2006-06-17	5 <sup>5</sup>	0.1	2009	10	2002-01-01	zero
Chlorite	1000	2006-06-17	20	50	2009	1000	2002-01-01	800

## Radionuclides

The information in the following table can be found in [22 CCR §64442](#) (California MCLs and DLRs), [22 CCR §64443](#) (California MCLs and DLRs), [OEHHA's website](#) (California PHGs), [40 CFR §141.66](#) (U.S. EPA MCLs), and [40 CFR §141.55](#) (U.S. EPA MCLGs). The values in this table are in **units of picocuries per liter (pCi/L)** unless otherwise stated.

<sup>5</sup> The DLR for bromate is 0.0010 mg/L for analysis performed using EPA Methods 317.0 Revision 2.0, 321.8, or 326.0.

Radionuclides	California					U.S. EPA		
	MCL	MCL Effective Date	DLR	PHG	PHG Date	MCL	MCL Effective Date	MCLG
Gross alpha particle activity <sup>6</sup>	15 <sup>7</sup> 15	2006-06-11 1977	3	none <sup>8</sup>	--	15	1977-06-24	zero
Beta/photon emitters <sup>9</sup>	4 mrem/yr 50	2006-06-11 1977	4	none <sup>7</sup>	--	4 mrem/yr	1977-06-24	zero
Radium-226	--	--	1	0.05	2006	--	--	--
Radium-228	--	--	1	0.019	2006	--	--	--
Radium-226 + Radium-228	5 <sup>6</sup> 5	2006-06-11 1977	--	--	--	5	1977-06-24	zero
Strontium-90	8 <sup>10</sup> 8	2006-06-11 1977	2	0.35	2006	4 mrem/yr <sup>11</sup> 8	2003-12-08 1977-06-24	--
Tritium	20,000 <sup>9</sup> 20,000	2006-06-11 1977	1,000	400	2006	4 mrem/yr <sup>10</sup> 20,000	2003-12-08 1977-06-24	--
Uranium	20 <sup>6</sup> 20	2006-06-11 1989-01-01	1	0.43	2001	30 µg/L <sup>12</sup>	2003-12-08	zero

<sup>6</sup> Excludes alpha particle activity from radon and uranium.

<sup>7</sup> Revised MCL applies to both community (CWS) and nontransient noncommunity water systems (NTNCWS); previous MCL applied only to CWS.

<sup>8</sup> OEHA concluded in 2003 that it would not be practical to develop a PHG ([for gross alpha particle activity](#), [for gross beta particle/photon emitters](#)).

<sup>9</sup> Beta/photon emitters MCLs are in units of millirems per year (mrem/yr) annual dose equivalent to the total body or any internal organ. The DLR is in units of pCi/L of gross beta particle activity.

<sup>10</sup> Revised MCL applies to all CWS and NTNCWS; previous MCL applied only to water systems with at least 30,000 service connections that used surface water.

<sup>11</sup> U.S. EPA does not have specific MCLs for strontium-90 or tritium; both are regulated under the beta/photon emitters MCL.

<sup>12</sup> U.S. EPA MCL of 30 µg/L is equivalent to 20.1 pCi/L (unit conversion using natural uranium specific activity of 0.67 pCi/µg).

## Copper and Lead

Standards for lead and copper are called “Action Levels” instead of MCLs. If a system exceeds an Action Level, it must take certain actions such as additional monitoring, corrosion control studies and treatment, and for lead, a public education program. The information in the following table can be found in [22 CCR §64678](#) (California Action Levels and DLRs), [OEHHA's website](#) (California PHGs), [40 CFR §141.80](#) (U.S. EPA Action Levels), and [40 CFR §141.51](#) (U.S. EPA MCLGs). The values in this table are in **units of micrograms per liter (µg/L)**.

Contaminants	California					U.S. EPA		
	Action Level	Action Level Effective Date	DLR	PHG	PHG Date	Action Level	Action Level Effective Date	MCLG
Copper	1,300	1995-12-11	50	300	2008	1,300	1991-11-06	1,300
Lead	15 50	1995-12-11 1977	5	0.2	2009	15 50	1991-11-06 1977-06-24	zero

## Treatment Techniques

A treatment technique is a required process intended to reduce contaminant levels in drinking water, safeguarding public health. Rather than setting specific limits on contaminant concentrations, the treatment techniques below focus on the processes used to ensure protection from contaminants:

- **Coliform:** If a water system finds coliform bacteria (which indicate the presence of harmful microorganisms), they must assess and fix any issues in actions called Level 1 and Level 2 assessments.
- **Viruses:** Systems must treat groundwater to remove or inactivate at least 99.99% of viruses using methods like disinfection. They must monitor and correct any issues within hours if they fail to meet these standards.
- **Cryptosporidium:** For surface water or groundwater influenced by surface water, system must treat to remove or inactivate a parasite called Cryptosporidium, which involves special filtration and disinfection processes.
- **Disinfection Byproducts:** Systems have several options for treatment techniques to reduce the levels of disinfection byproducts (total trihalomethanes (TTHMs), haloacetic acids (HAA5), bromate, and chlorite).
- **Acrylamide and Epichlorohydrin:** Water systems that use certain chemicals in the treatment process must certify that the chemical levels are kept below safe limits.

## Secondary Standards

Secondary Maximum Contaminant Levels (SMCLs) provide water quality standards related to aesthetic aspects of drinking water, such as taste, odor, and appearance. Though not directly linked to health risks, SMCLs play a crucial role in maintaining

consumer confidence and satisfaction. The information in the following two tables can be found in [22 CCR §64449](#) (California SMCLs) and [40 CFR §143.3](#) (U.S. EPA SMCLs). The values in this table are in **units of micrograms per liter (µg/L)** unless otherwise stated.

Chemical	California			U.S. EPA		
	SMCL		SMCL Effective Date	SMCL	SMCL Effective Date	
Aluminum	200		1994-09-08	50 to 200	1992-07-30	
Color	15 Units		1977	15 Units	1981-01-19	
Copper	1,000		1977	1,000 <sup>13</sup> 1,000	1992-07-30 1981-01-19	
Corrosivity	--		Removed	Non-corrosive	1981-01-19	
Fluoride	--		--	2,000	1986-05-02	
Foaming Agents (MBAS)	500		1977	500	1981-01-19	
Iron	300		1977	300	1981-01-19	
Manganese	50		1977	50	1981-01-19	
Methyl- <i>tert</i> -butyl ether (MTBE)	5		1999-01-07	--	--	
Odor -Threshold	3 Units		1977	3 Units	1981-01-19	
pH	--		--	6.5 to 8.5	1981-01-19	
Silver	100		--	100	1992-07-30	
Thiobencarb	1		1989-04-05	--	--	
Turbidity	5 Units		1977	--	--	
Zinc	5,000		1977	5,000	1981-01-19	
	<b>Recommended</b>	<b>Upper</b>	<b>Short Term</b>			
Total Dissolved Solids (mg/L) <i>or</i> Specific Conductance (µS/cm <sup>9</sup> )	500	1,000	1,500	--	500	1981-01-19
	900	1,600	2,200	--	--	--
Chloride (mg/L)	250	500	600	--	250	1981-01-19
Sulfate (mg/L)	250	500	600	--	250	1981-01-19

<sup>13</sup> The updated SMCL for copper increased the number of significant figures from 1 to 2.

## Chemicals soon to be regulated in drinking water in California

The information in the following table can be found in [OEHHA's website](#) (California PHGs), [40 CFR §141.61](#) (U.S. EPA MCLs), and [40 CFR §141.50](#) (U.S. EPA MCLGs). The values in this table are in **units of nanograms per liter (ng/L)** unless otherwise stated.

Chemicals	California				U.S. EPA		
	MCL	DLR	PHG	PHG Date	MCL	MCL Effective Date	MCLG
N-Nitrosodimethylamine (NDMA)	--	--	3	2006	--	--	--
Perfluorooctanoic acid (PFOA)	--	--	0.007	2024	4.0	2029-04-26	zero
Perfluorooctane sulfonic acid (PFOS)	--	--	1	2024	4.0	2029-04-26	zero
Perfluorohexane sulfonic acid (PFHxS)	--	--	--	--	10.0	2029-04-26	10
Perfluorononanoate (PFNA)	--	--	--	--	10.0	2029-04-26	10
2,3,3,3-Tetrafluoro-2-(heptafluoropropoxy)propanoate (HFPO-DA or GenX Chemicals)	--	--	--	--	10.0	2029-04-26	10
PFAS Hazard Index <sup>14</sup> (includes HFPO-DA, PFBS <sup>15</sup> , PFHxS, and PFNA)	--	--	--	--	1 (unitless)	2029-04-26	1 (unitless)

<sup>14</sup> PFAS Hazard Index =  $([\text{HFPO-DA}_{\text{water}} \text{ ng/L}]/[10 \text{ ng/L}]) + ([\text{PFBS}_{\text{water}} \text{ ng/L}]/[2000 \text{ ng/L}]) + ([\text{PFNA}_{\text{water}} \text{ ng/L}]/[10 \text{ ng/L}]) + ([\text{PFHxS}_{\text{water}} \text{ ng/L}]/[10 \text{ ng/L}])$

<sup>15</sup> Perfluorobutane sulfonate (PFBS)

# **EXHIBIT 9**

1 **BEFORE THE STATE WATER RESOURCES CONTROL BOARD**

2 In The Matter Of:

3  
4 CHIQUITA CANYON, LLC

**DECLARATION OF CLIFFORD  
BALDRIDGE**

5  
6 FOR REVIEW OF LOS ANGELES  
7 REGIONAL WATER QUALITY CONTROL  
8 BOARD INVESTIGATIVE ORDER NO. R4-  
2024-0010-A01

9 I, Clifford Baldrige, declare as follows:

10 1. I am of sufficient age and competent to testify to the matters contained in this  
11 declaration.

12 2. The facts in this declaration are based on my personal knowledge.

13 3. I am the Quality Assurance Director at Enthalpy Analytical, LLC, located at 931 W.  
14 Barkley Avenue, Orange, CA 92868 in Orange County, California (hereinafter referred to as  
15 “Enthalpy”). I have served in this role at the Orange County location since April 2025. My general  
16 responsibilities as the Quality Assurance Director include maintaining Enthalpy’s accreditations,  
17 managing the quality management system, performing internal audits, facilitating external  
18 assessments of Enthalpy, and managing corrective actions. My expertise is in environmental  
19 analytical chemistry, with 11 years as a Quality Assurance Director with Enthalpy Analytical at  
20 multiple locations and a total of 19 years in this field.

21 4. Enthalpy has been retained by Chiquita Canyon, LLC, for the last two years to analyze  
22 and produce analytical reports for various groundwater, stormwater, and surface water samples  
23 collected from Chiquita Canyon Landfill (“Landfill”).

24 **Enthalpy’s Laboratory Practices**

25 5. Enthalpy provides environmental laboratory testing services, delivering high-quality,  
26 defensible data across air, soil, water, sediment, PFAS, and ultratrace analyses. The nationwide  
27 network of accredited laboratories operates under strict federal, state, and internal QA/QC  
28

1 requirements and performs certified analytical methods to ensure reliable, compliant results for  
2 regulatory and project-specific needs.

3 6. Enthalpy maintains accreditations and complies with the requirements of the  
4 California State Environmental Laboratory Accreditation Program (CA ELAP), Oregon  
5 Environmental Laboratory Accreditation Program (OR ELAP, NELAP Recognized), South Coast  
6 Air Quality Management District, Alaska Department of Environmental Conservation, and State of  
7 Hawaii Department of Health, State Laboratories Division.

8 7. Enthalpy adheres to the 2016 TNI standard, the requirements of state accrediting  
9 bodies, and requirements in accredited methodologies. Enthalpy follows over 130 Standard Operating  
10 Procedures and related reference documents.

### 11 **The Amended Investigative Order**

12 8. I have reviewed Investigative Order No. R4-2024-0010-A01 (the “Amended Order”)  
13 issued by the Los Angeles Regional Water Quality Control Board (“Regional Board”) on February  
14 11, 2026.

### 15 **Reporting Limits**

16 9. A Reporting Limit (“RL”) is the lowest concentration at which a laboratory can  
17 reliably quantify and report an analyte in a particular matrix using a particular method. In practice,  
18 the Reporting Limit is driven by instrument sensitivity, the preparation and extraction steps required  
19 by the analytical method, and matrix-specific conditions, such as sediment load or extract color, that  
20 may be present in the sample and potentially interfere with the analysis.

21 10. By contrast, a Method Detection Limit (“MDL”) is the statistically-determined lowest  
22 concentration at which an analytical method can reliably distinguish, with 99% confidence, that the  
23 measured concentration is distinguishable from the method blank, meaning that a laboratory can say  
24 that the analyte is probably present, but not measure it precisely. Detections of an analyte at or above  
25 the applicable MDL but below the applicable Reporting Limit will be flagged in the laboratory report  
26 (Enthalpy uses “J” flags for this purpose) as estimated values. If an analyte is not detected at or above  
27 the applicable MDL, it will be reported as Non-Detect (“ND”).

1 11. Enthalpy's standard Reporting Limits are based on instrument sensitivities, sample  
2 preparation processes, and MDLs, among other variables. These standard Reporting Limits are listed  
3 in **Attachment 1**, Column J. Enthalpy's current Reporting Limits meet or exceed industry standards.

4 12. **Attachment 1** lists the Reporting Limits required for all verified 240 analytes included  
5 in Appendix 1 of the Amended Order. For each analyte, the table identifies in Column L whether  
6 Enthalpy is able to meet the Reporting Limit, using four categories: Reporting Limits that (1)  
7 Enthalpy can currently meet with existing, validated methods; (2) Enthalpy may be able to meet  
8 following additional instrument recalibration and method updates; (3) Enthalpy cannot meet  
9 following additional instrument recalibration and method updates; and (4) are associated with  
10 analytes that Enthalpy is not accredited to analyze.

11 13. Of the 241 analytes listed in **Attachment 1**, 124 fall into Category 1, 28 fall into  
12 Category 2, 42 fall into Category 3, and 46 fall into Category 4. Appendix 1 of the Amended Order  
13 requires analysis and sets a Reporting Limit for one additional analyte, 1,1-dichlorobenzene, which  
14 does not exist and therefore cannot be analyzed by Enthalpy.

15 14. For the 124 analytes in Category 1, Enthalpy can currently meet the Reporting Limits  
16 specified in the Amended Order using existing, validated methods.

17 15. For the 28 analytes in Category 2, Enthalpy would be required to conduct what is  
18 known as "method development" to determine whether they are able to meet the Reporting Limits  
19 specified in Appendix 1 of the Amended Order. This could potentially take weeks or months to  
20 complete for each analyte and can be costly if significant staff time or equipment upgrades are  
21 required. Enthalpy cannot guarantee ahead of time that method development will be successful and  
22 that the Category 2 Reporting Limits can be met.

23 16. For the 42 analytes in Category 3, Enthalpy cannot meet the Reporting Limits  
24 specified in Appendix 1 of the Amended Order even with method development because the limits are  
25 orders of magnitude lower than Enthalpy's standard Reporting Limits. Since Reporting Limits are  
26 constrained by instrument sensitivity, analytical method, and sample matrix interference, even with  
27 new equipment and new or revised methods, the Category 3 Reporting Limits are reasonably  
28 unattainable by Enthalpy.

1           17. For the 46 analytes in Category 4, the analytes are not part of Enthalpy's current  
2 reporting target list. Enthalpy is not accredited to analyze samples for these analytes.

3           18. Thus, 116 of the total verified 240 Reporting Limits in **Attachment 1** either require  
4 further method development at Enthalpy, which may take several weeks or months to complete and  
5 cannot be guaranteed ahead of time will be successful, cannot be met following instrument  
6 recalibration and method development, or Enthalpy is not accredited to analyze.

### 7 **Dilution of Samples**

8           19. Dilution of samples is a commercially accepted practice and is essential to providing  
9 accurate analytical results and ensuring the continued operation of laboratory equipment.

10           20. At Enthalpy, dilution may be required: (1) when the concentration of one or more  
11 analytes exceeds the range that the instrument has been calibrated to measure accurately; (2) when  
12 samples or their extracts have atypical color or viscosity (indicating the potential for contaminants or  
13 interferants that may immediately degrade instrument performance); (3) when sample matrix  
14 interference affects the recovery of surrogates or internal standards used for quality controls; (4) or  
15 when other situations arise that could impact the ability of the equipment to properly analyze the  
16 sample.

17           21. Dilution factors vary depending on the extent to which the above situations affect the  
18 samples and instrumentation. Consistent with industry standard, analyst discretion is relied upon to  
19 meet clients' analytical needs (including reporting limits), dilute samples sufficiently to maintain  
20 reliable results and proper equipment function, and avoid over-dilution of samples (i.e., dilution to a  
21 degree that an analyte that would have been detected in the absence of interferences is rendered Non-  
22 Detect).

23           22. Some analytical methods require dilution more frequently than others. For example,  
24 the extract from samples of semi-volatile organic compound analysis (Method 8270C), which are  
25 compounds that can be associated with leachate, can be dark in color. Analyzing the extract undiluted  
26 can degrade the performance of the analytical instruments.

27           23. The most recent nine (9) stormwater submissions currently in progress as of March  
28

1 12, 2026, are in the process of being analyzed undiluted, except where minimal dilution would be  
2 necessary to bring results within the analytical calibration range and/or due to bench-level analysts'  
3 discretion.

4 24. Item 1.1.i-ii of the Amended Order requires that diluted samples be “re-run” at a lesser  
5 dilution value until a detection without a J flag is obtained or the reporting limit is met. This approach  
6 may damage critical laboratory equipment. Furthermore, this approach may result in unusable data  
7 for certain samples analyzed by methods that require internal standards. Internal standards are  
8 compounds added to samples after preparation that are chemically similar to the compounds of  
9 interest and that are not expected to be present in environmental samples. These compounds are used  
10 to monitor matrix effects on the instrument during analysis, and to correct for those effects. Internal  
11 standards have an inverse relationship with target compounds, meaning that if the internal standard  
12 response decreases by 20%, the associated target compounds will be calculated 20% more than their  
13 response. Analytical methods that use internal standards require that these compounds recover within  
14 a set range. Internal standards added to undiluted samples with existing interference (such as dark  
15 color, or high viscosity), Enthalpy may not obtain sufficient recovery of the internal standards and  
16 therefore will not have useable data for that sample due to the interference present in the sample.

### 17 **Holding Times**

18 25. Holding times are the maximum allowed duration between sample collection and the  
19 start of analysis or preparation (e.g., extraction). For samples that undergo digestion or extraction, a  
20 second hold time may apply, defining the maximum allowed duration between preparation and  
21 analysis. Adhering to holding times ensures the integrity of the sample and prevents degradation from  
22 processes like volatilization and biodegradation. Analyzing samples outside of the holding time can  
23 produce invalid results.

24 26. Holding times vary depending on the method utilized. **Attachment 1** lists the  
25 applicable holding times for every method/analyte combination included in Appendix 1 of the  
26 Amended Order (*see* Columns D and E).

27 27. Where re-running diluted samples at a lower dilution factor is possible without risking  
28

1 damage to laboratory instrumentation, method/analyte hold time(s) must be considered when  
2 determining if a re-run will produce valid results. For methods or analytes with shorter holding times,  
3 re-running samples may not be possible by the time a J-flag (i.e., detected above the MDL but below  
4 the Reporting Limit) or Non-Detect result is reviewed by the analyst because the holding time may  
5 have passed. Example analytes include Acrolein, which has a 72-hour hold time under EPA Method  
6 8260, and Nitrate Nitrogen, which has a 48-hour hold time under EPA Method 300.0.

7 **Case Narratives**


8 28. Item 1.1.ii of the Amended Order provides that “[d]ilution of samples is permitted  
9 when required by the sample conditions and the sample conditions shall be described in a case  
10 narrative or data qualifier.”

11 29. It is not standard practice to address dilution in case narratives or with a data qualifier  
12 because the dilution factor for each analyte is apparent in the data. However, for samples analyzed  
13 under this Amended Order, Enthalpy can comply with the narrative requirements but doing so will  
14 take additional time.

15 I declare under penalty of perjury under the laws of the State of California that the foregoing is true  
16 and correct.

17 DATED: March 13, 2026

ENTHALPY ANALYTICAL, LLC

18 By:  Digitally signed by Clifford Baldrige  
19 DN: cn=Clifford Baldrige, o=Enthalpy  
Analytical, ou=QA Director,  
email=cliff.baldrige@enthalpy.com, c=US  
Date: 2026.03.13 14:48:15 -07'00'  
20 Clifford Baldrige

Compound Name	Method	Sample Hold Time	Extract Hold Time	Appendix 1 Reporting Limit	Units	Lab RL	Lab MDL	Identifier
1,1,1,2-Tetrachloroethane	8260	7 days	N/A	0.5	ug/L	0.5	0.18	1
1,1,1-Trichloroethane; Methylchloroform	8260	7 days	N/A	0.5	ug/L	0.5	0.22	1
1,1,2,2-Tetrachloroethane	8260	7 days	N/A	<0.17	ug/L	0.5	0.2	3
1,1,2-Trichloroethane	8260	7 days	N/A	<0.5	ug/L	0.5	0.15	2
1,1-Dichlorobenzene	8260	7 days	N/A	0.5	ug/L	a	a	a
1,1-Dichloroethane; Ethylidene chloride	8260	7 days	N/A	0.5	ug/L	0.5	0.2	1
1,1-Dichloroethylene; 1,1-Dichloroethene;	8260	7 days	N/A	<0.057	ug/L	0.5	0.26	3
1,1-Dichloropropene	8260	7 days	N/A	0.5	ug/L	0.5	0.23	1
1,2,3-Trichloropropane	8260	7 days	N/A	<0.0007	ug/L	0.5	0.28	3
1,2,4,5-Tetrachlorobenzene				10	ug/L			4
1,2,4-Trichlorobenzene	8260	7 days	N/A	<0.071	ug/L	0.5	0.29	3
1,2-Dibromo-3-chloropropane; DBCP	8260	7 days	N/A	<0.0017	ug/L	2	0.64	3
1,2-Dibromoethane; Ethylene dibromide; EDB	8260	7 days	N/A	<0.05	ug/L	0.5	0.19	3
1,2-Dichloroethane; Ethylene dichloride	8260	7 days	N/A	<0.38	ug/L	0.5	0.16	3
1,2-Dichloropropane	8260	7 days	N/A	0.5	ug/L	0.5	0.16	1
1,3-Dichloropropane; Trimethylene dichloride	8260	7 days	N/A	0.5	ug/L	0.5	0.13	1
1,4-Dichlorobenzene	8260	7 days	N/A	0.5	ug/L	0.5	0.2	1
1,4-Dioxane	8270 SIM	7 days	40 days	<1.3	ug/L	1	0.872	1
1,4-Naphthoquinone				10	ug/L			4
1-Naphthylamine				20	ug/L			4
2,2-Dichloropropane; Isopropylidene chloride	8260	7 days	N/A	0.5	ug/L	0.5	0.22	1
2,3,4,6-Tetrachlorophenol				10	ug/L			4
2,3,7,8-TCDD; 2,3,7,8-	8290A	30 days	45 days	<0.000000013	ug/L	0.00001	0.00000356	3
2,4,5-T; 2,4,5-Trichlorophenoxyacetic acid	8151A	7 days	40 days	No RL	ug/L	0.2	0.1	1
2,4,5-Trichlorophenol	8270	7 days	40 days	<2.1	ug/L	10	3.72	3
2,4,6-Trichlorophenol	8270	7 days	40 days	10	ug/L	10	4.07	1
2,4-D; 2,4-Dichlorophenoxyacetic acid	8151A	7 days	40 days	No RL	ug/L	0.2	0.079	1
2,4-Dichlorophenol	8270	7 days	40 days	10	ug/L	10	3.7	1
2,4-Dimethylphenol; m-Xylenol	8270	7 days	40 days	10	ug/L	10	3.24	1
2,4-Dinitrophenol	8270	7 days	40 days	50	ug/L	50	14.8	1
2,4-Dinitrotoluene	8270	7 days	40 days	<0.11	ug/L	10	4.25	3
2,6-Dichlorophenol				10	ug/L			4
2,6-Dinitrotoluene	8270	7 days	40 days	10	ug/L	10	4.43	1
2-Acetylaminofluorene; 2-AAF				20	ug/L			4
2-Chloronaphthalene	8270	7 days	40 days	10	ug/L	10	3.41	1
2-Chlorophenol	8270	7 days	40 days	10	ug/L	10	3.62	1
2-Hexanone; Methyl butyl ketone	8260	7 days	N/A	5	ug/L	5	1.3	1
2-Methylnaphthalene	8270	7 days	40 days	10	ug/L	10	3.36	1
2-Naphthylamine				10	ug/L			4
3,3'-Dichlorobenzidine	8270	7 days	40 days	20	ug/L	25	5.19	2
3,3'-Dimethylbenzidine				10	ug/L			4
3-Methylcholanthrene				10	ug/L			4
4,4'-DDD	608.3 LL	7 days	40 days	<0.00083	ug/L	0.02	0.00643	3
4,4'-DDE	608.3 LL	7 days	40 days	<0.00059	ug/L	0.02	0.00728	3
4,4'-DDT	608.3 LL	7 days	40 days	<0.00059	ug/L	0.02	0.0164	3
4,6-Dinitro-o-cresol; 4,6-Dinitro-2-methylphenol	8270	7 days	40 days	<0.12	ug/L	50	17.1	3
4-Aminobiphenyl				20	ug/L			4
4-Bromophenyl phenyl ether	8270	7 days	40 days	10	ug/L	10	3.29	1
4-Chlorophenyl phenyl ether	8270	7 days	40 days	10	ug/L	10	3.05	1
4-Methyl-2-pentanone; Methyl isobutyl ketone	8260	7 days	N/A	5	ug/L	5	1	1
5-Nitro-o-toluidine				10	ug/L			4
7,12-Dimethylbenz[a]anthracene				<0.0044	ug/L			4

Acenaphthene	8270 SIM PAH	7 days	40 days	10	ug/L	0.5	0.171	1
Acenaphthylene	8270 SIM PAH	7 days	40 days	10	ug/L	0.5	0.23	1
Acetone	8260	7 days	N/A	10	ug/L	25	14	3
Acetonitrile; Methyl cyanide				No RL				4
Acetophenone				10	ug/L			4
Acrolein	624.1	72 hrs	N/A	<3	ug/L	5	2.7	2
Acrylonitrile	624.1	72 hrs	N/A	<0.059	ug/L	2	0.69	3
Aldrin	608.3 LL	7 days	40 days	<0.00013	ug/L	0.01	0.00289	3
Allyl chloride	8260	7 days	N/A	No RL	ug/L	5	0.35	1
alpha, alpha-Dimethylphenethylamine				No RL				4
alpha-BHC	608.3 LL	7 days	40 days	<0.0039	ug/L	0.01	0.00307	3
Alpha-Terpineol	625.1	7 days	40 days	<33	ug/L	10	2.07	1
Ammonia Nitrogen	SM 4500-NH3-G	28 days	N/A	2,000	ug/L	100	68.5	1
Anthracene	8270 SIM PAH	7 days	40 days	10	ug/L	0.5	0.189	1
Benzene	8260	7 days	N/A	0.5	ug/L	0.5	0.19	1
Benzo[a]anthracene; Benzanthracene	8270 SIM PAH	7 days	40 days	<0.029	ug/L	0.5	0.166	3
Benzo[a]pyrene	8270 SIM PAH	7 days	40 days	<0.0044	ug/L	0.5	0.181	3
Benzo[b]fluoranthene	8270 SIM PAH	7 days	40 days	<0.0044	ug/L	0.5	0.172	3
Benzo[ghi]perylene	8270 SIM PAH	7 days	40 days	<4	ug/L	0.5	0.249	1
Benzoic Acid	625.1	7 days	40 days	<120	ug/L	50	10.9	1
Benzo[k]fluoranthene	8270 SIM PAH	7 days	40 days	<0.0044	ug/L	0.5	0.189	3
Benzyl alcohol	8270	7 days	40 days	24	ug/L	25	5.77	2
beta-BHC	608.3 LL	7 days	40 days	<0.014	ug/L	0.01	0.00262	1
Bicarbonate as CaCO3	SM 2320B	14 days	N/A	No RL	ug/L	2000	2000	1
Bis(2-chloro-1-methylethyl) ether; 2,2-Dichlorodisopropyl	8270	7 days	40 days	No RL	ug/L	10	3.84	1
Bis(2-chloroethoxy)methane	8270	7 days	40 days	10	ug/L	10	3.67	1
Bis(2-chloroethyl)ether; Dichloroethyl ether	8270	7 days	40 days	10	ug/L	25	3.72	2
Bis(2-ethylhexyl) phthalate	8270	7 days	40 days	3	ug/L	10	3.31	2
Bromide	EPA 300.0	28 days	N/A	300	ug/L	300	61.1	1
Bromochloromethane; Chlorobromomethane	8260	7 days	N/A	0.5	ug/L	0.5	0.18	1
Bromodichloromethane; Dibromochloromethane	8260	7 days	N/A	<0.41	ug/L	0.5	0.16	2
Bromoform; Tribromomethane	8260	7 days	N/A	1	ug/L	1	0.17	1
Butyl benzyl phthalate; Benzyl butyl phthalate	8270	7 days	40 days	10	ug/L	10	3.63	1
Carbon dioxide	RSK175	7 days	N/A	50	ug/L	50	50	1
Carbon disulfide	8260	7 days	N/A	5	ug/L	5	0.3	1
Carbon tetrachloride	8260	7 days	N/A	<0.25	ug/L	0.5	0.13	2
Chlordane	608.3 LL	7 days	40 days	<0.00057	ug/L	0.2	0.0454	3
Chloride	EPA 300.0	28 days	N/A	1,000	ug/L	1000	272	1
Chlorobenzene	8260	7 days	N/A	0.5	ug/L	0.5	0.18	1
Chloroethane; Ethyl chloride	8260	7 days	N/A	0.5	ug/L	0.5	0.24	1
Chloroform; Trichloromethane	8260	7 days	N/A	0.5	ug/L	0.5	0.29	1
Chloromethane	8260	7 days	N/A	0.5	ug/L	0.5	0.33	1
Chloroprene	8260	7 days	N/A	200	ug/L	200	2.68	1
Chrysene	8270 SIM PAH	7 days	40 days	<0.0044	ug/L	0.5	0.17	3
cis-1,2-Dichloroethene	8260	7 days	N/A	0.5	ug/L	0.5	0.2	1
Vinylidene chloride cis-1,2-Dichloroethylene; cis-1,2-	8260	7 days	N/A	0.5	ug/L	0.5	0.2	1
cis-1,3-Dichloropropene	8260	7 days	N/A	0.5	ug/L	0.5	0.31	1
COD	EPA 410.4	28 days	N/A	4,000	ug/L	4000	1950	1
Cyanide	EPA 9012A	14 days	N/A	5	ug/L	10	1.68	2
delta-BHC	608.3 LL	7 days	40 days	0.09	ug/L	0.01	0.00282	1
Diallate				10	ug/L			4
Dibenz[a,h]anthracene	8270 SIM PAH	7 days	40 days	<0.0044	ug/L	0.5	0.264	3
Dibenzofuran	8270	7 days	40 days	10	ug/L	10	3.21	1
Dibromochloromethane; Chlorodibromomethane	8260	7 days	N/A	<0.41	ug/L	0.5	0.13	2

Dichlorodifluoromethane; CFC 12	8260	7 days	N/A	<0.19	ug/L	0.5	0.18	3
Dieldrin	608.3 LL	7 days	40 days	<0.00014	ug/L	0.02	0.00251	3
Diethyl phthalate	8270	7 days	40 days	10	ug/L	10	2.94	1
Dimethoate				20	ug/L			4
Dimethyl phthalate	8270	7 days	40 days	10	ug/L	10	3.43	1
Di-n-butyl phthalate	8270	7 days	40 days	10	ug/L	10	3.01	1
Di-n-octyl phthalate	8270	7 days	40 days	10	ug/L	10	4.7	1
Dinoseb; DNBP; 2-sec-Butyl-4,6-dinitrophenol	8151A	7 days	40 days	<7	ug/L	1	0.3	1
Diphenylamine				10	ug/L			4
Disulfoton	8141A	7 days	40 days	<0.05	ug/L	0.2	0.05	3
Endosulfan I; alpha-Endosulfan	608.3 LL	7 days	40 days	0.14	ug/L	0.01	0.00235	1
Endosulfan II	608.3 LL	7 days	40 days	0.04	ug/L	0.02	0.00438	1
Endosulfan sulfate	608.3 LL	7 days	40 days	0.66	ug/L	0.02	0.0038	1
Endrin	608.3 LL	7 days	40 days	<0.036	ug/L	0.02	0.0029	1
Endrin aldehyde	608.3 LL	7 days	40 days	0.23	ug/L	0.02	0.00597	1
Ethyl methacrylate	8260	7 days	N/A	No RL	ug/L	50	3.91	1
Ethyl methanesulfonate				20	ug/L			4
Ethylbenzene	8260	7 days	N/A	0.5	ug/L	0.5	0.19	1
Famphur				No RL				4
Fluoranthene	8270 SIM PAH	7 days	40 days	10	ug/L	0.5	0.193	1
Fluorene	8270 SIM PAH	7 days	40 days	10	ug/L	0.5	0.181	1
Fluoride	EPA 300.0	28 days	N/A	200	ug/L	200	82.5	1
gamma-BHC; Lindane	608.3 LL	7 days	40 days	<0.019	ug/L	0.01	0.00221	1
Heptachlor	608.3 LL	7 days	40 days	<0.00021	ug/L	0.01	0.00261	3
Hexachlorobenzene	8270	7 days	40 days	10	ug/L	10	3.03	1
Hexachlorobutadiene	8260	7 days	N/A	0.5	ug/L	1	0.26	3
Hexachlorocyclopentadiene	8270	7 days	40 days	50	ug/L	25	7.81	1
Hexachloroethane	8270	7 days	40 days	10	ug/L	10	3.01	1
Hexachloropropene				10	ug/L			4
Indeno(1,2,3-cd)pyrene	8270 SIM PAH	7 days	40 days	<0.0044	ug/L	0.5	0.259	3
Isobutyl alcohol				No RL				4
Isodrin				20	ug/L			4
Isophorone	8270	7 days	40 days	10	ug/L	10	3.69	1
Isosafrole				10	ug/L			4
Kepone				<0.0022	ug/L			4
m-Cresol; 3-Methylphenol	625.1	7 days	40 days	No RL	ug/L	10	3.01	1
m-Dichlorobenzene; 1,3-Dichlorobenzene	8260	7 days	N/A	0.5	ug/L	0.5	0.21	1
m-Dinitrobenzene				20	ug/L			4
Methacrylonitrile	8260	7 days	N/A	35	ug/L	35	4.22	1
Methapyrilene				No RL				4
Methoxychlor	608.3 LL	7 days	40 days	<30	ug/L	0.02	0.0085	1
Methyl bromide; Bromomethane	8260	7 days	N/A	0.5	ug/L	1	0.34	2
Methyl chloride; Chloromethane	8260	7 days	N/A	0.5	ug/L	0.5	0.33	1
Methyl ethyl ketone; MEK; 2-Butanone	8260	7 days	N/A	3	ug/L	5	2.2	2
Methyl iodide; Iodomethane	8260	7 days	N/A	5	ug/L	10	4.4	3
Methyl methacrylate	8260	7 days	N/A	No RL	ug/L	5	2.4	1
Methyl methanesulfonate				10	ug/L			4
Methyl parathion; Parathion methyl	8141A	7 days	40 days	0.2	ug/L	0.2	0.05	1
Methylene bromide; Dibromomethane	8260	7 days	N/A	0.5	ug/L	0.5	0.4	1
Methylene chloride; Dichloromethane	8260	7 days	N/A	3	ug/L	5	0.35	2
m-Nitroaniline; 3-Nitroaniline	8270	7 days	40 days	No RL	ug/L	10	3.99	1
Naphthalene	8270 SIM PAH	7 days	40 days	<0.29	ug/L	0.5	0.181	3
Nitrate Nitrogen	EPA 300.0	48 hours	N/A	No RL	ug/L	100	49.6	1
Nitrobenzene	8270	7 days	40 days	10	ug/L	25	8.4	2

N-Nitrosodiethylamine				No RL					4
N-Nitrosodimethylamine	8270	7 days	40 days	<0.00069	ug/L	10	2.88		3
N-Nitrosodi-n-butylamine				No RL					4
N-Nitrosodiphenylamine	8270	7 days	40 days	<5	ug/L	10	3.95		2
N-Nitrosodipropylamine; N-Nitroso-N-dipropylamine; Di-n-Nitrosomethylethalamine	8270	7 days	40 days	No RL	ug/L	10	3.85		1
N-Nitrosopiperidine				No RL					4
N-Nitrosopyrrolidine				No RL					4
O,O,O-Triethyl phosphorothioate				No RL					4
o-Cresol; 2-Methylphenol	625.1	7 days	40 days	10	ug/L	10	3.24		1
o-Dichlorobenzene; 1,2-Dichlorobenzene	8260	7 days	N/A	10	ug/L	0.5	0.17		1
o-Nitroaniline; 2-Nitroaniline	8270	7 days	40 days	50	ug/L	50	4.34		1
o-Nitrophenol; 2-Nitrophenol	8270	7 days	40 days	10	ug/L	10	5.44		1
o-Toluidine				20	ug/L				4
p-(Dimethylamino)azobenzene				10	ug/L				4
Parathion				No RL					4
p-Chloroaniline	8270	7 days	40 days	10	ug/L	10	3.08		1
p-Chloro-m-cresol; 4-Chloro-3-methylphenol	8270	7 days	40 days	20	ug/L	10	3.59		1
p-Cresol; 4-Methylphenol	625.1	7 days	40 days	<25	ug/L	10	3.01		1
p-Dichlorobenzene; 1,4-Dichlorobenzene	8260	7 days	N/A	<0.19	ug/L	0.5	0.2		3
Pentachlorobenzene				10	ug/L				4
Pentachloronitrobenzene				20	ug/L				4
Pentachlorophenol	8151A	7 days	40 days	<0.28	ug/L	0.2	0.055		1
Phenacetin				20	ug/L				4
Phenanthrene	8270 SIM PAH	7 days	40 days	10	ug/L	0.5	0.158		1
Phenol	625.1	7 days	40 days	10	ug/L	10	2.11		1
Phorate	8141A	7 days	40 days	0.2	ug/L	0.2	0.066		1
p-Nitroaniline; 4-Nitroaniline	8270	7 days	40 days	10	ug/L	10	3.35		1
p-Nitrophenol; 4-Nitrophenol	8270	7 days	40 days	50	ug/L	50	8.48		1
Polychlorinated biphenyls; PCBs	608.3	7 days	40 days	<0.00017	ug/L	0.5	0.235-0.467		3
p-Phenylenediamine				No RL					4
Pronamide				10	ug/L				4
Propionitrile; Ethyl cyanide				No RL					4
Pyrene	8270 SIM PAH	7 days	40 days	10	ug/L	0.5	0.196		1
Safrole				10	ug/L				4
Silvex; 2,4,5-TP	8151A	7 days	40 days	5	ug/L	0.5	0.16		1
Styrene	8260	7 days	N/A	0.5	ug/L	0.5	0.2		1
Sulfate	EPA 300.0	28 days	N/A	1,000	ug/L	1000	264		1
Sulfide	SM 4500-S2 D	7 days	N/A	100	ug/L	100	100		1
sym-Trinitrobenzene				10	ug/L				4
TDS	SM 2540C	7 days	N/A	<450	ug/L	10,000	10,000		3
Tetrachloroethene	8260	7 days	N/A	0.5	ug/L	0.5	0.26		1
Tetrachloroethylene; Tetrachloroethene;	8260	7 days	N/A	0.5	ug/L	0.5	0.26		1
O,O-Diethyl O-2-pyrazinyl phosphorothioate; Thionazin				10	ug/L				4
Toluene	8260	7 days	N/A	0.5	ug/L	0.5	0.23		1
Total Alkalinity	SM 2320B	14 days	N/A	2,000	ug/L	2000	2000		1
Total Antimony	EPA 200.8/6020	6 months	N/A	0.5	ug/L	2	1.04		2
Total Arsenic	EPA 200.8/6020	6 months	N/A	1	ug/L	2	0.31		2
Total Barium	EPA 200.8/6020	6 months	N/A	0.5	ug/L	5	0.834		2
Total Beryllium	EPA 200.8/6020	6 months	N/A	0.25	ug/L	1	0.275		2
Total Boron	EPA 200.8/6020	6 months	N/A	10	ug/L	10	7.7		1
Total Cadmium	EPA 200.8/6020	6 months	N/A	0.2	ug/L	1	0.433		2
Total Calcium	EPA 200.8/6020	6 months	N/A	10,000	ug/L	309	309		1
Total Chromium	EPA 200.8/6020	6 months	N/A	0.5	ug/L	5	0.613		2

Total Copper	EPA 200.8/6020	6 months	N/A	0.5	ug/L	3	1.45	2
Total Iron	EPA 200.8/6020	6 months	N/A	1,000	ug/L	78.6	78.6	1
Total Lead	EPA 200.8/6020	6 months	N/A	0.25	ug/L	5	0.373	2
Total Magnesium	EPA 200.8/6020	6 months	N/A	100	ug/L	50	32.4	1
Total Manganese	EPA 200.8/6020	6 months	N/A	10	ug/L	10	4.47	1
Total Mercury	EPA 245.1/7470A	28 days	N/A	0.04	ug/L	0.4	0.166	3
Total Nickel	EPA 200.8/6020	6 months	N/A	1	ug/L	5	1.27	2
Total Organic Carbon	SM 5310B	28 days	N/A	1,000	ug/L	1000	492	1
Total Potassium	EPA 200.8/6020	6 months	N/A	500	ug/L	500	406	1
Total Selenium	EPA 200.8/6020	6 months	N/A	1	ug/L	2	1.91	3
Total Silver	EPA 200.8/6020	6 months	N/A	0.2	ug/L	5	0.37	2
Total Sodium	EPA 200.8/6020	6 months	N/A	600	ug/L	570	570	2
Total Suspended Solids	SM 2540D	7 days	N/A	100,000	ug/L	500	500	1
Total Thallium	EPA 200.8/6020	6 months	N/A	0.25	ug/L	1	0.347	2
Total Tin	EPA 200.8/6020	6 months	N/A	5	ug/L	5	2.67	1
Total Vanadium	EPA 200.8/6020	6 months	N/A	0.5	ug/L	5	0.596	2
Total Zinc	EPA 200.8/6020	6 months	N/A	1	ug/L	10	7.6	3
Toxaphene	608.3 LL	7 days	40 days	<0.0002	ug/L	0.4	0.125	3
trans-1,2-Dichloroethylene; trans-1,2-Dichloroethene	8260	7 days	N/A	0.5	ug/L	0.5	0.29	1
trans-1,3-Dichloropropene	8260	7 days	N/A	0.5	ug/L	0.5	0.28	1
trans-1,4-Dichloro-2-butene	8260	7 days	N/A	5	ug/L	2	0.52	1
Trichloroethene	8260	7 days	N/A	0.5	ug/L	0.5	0.26	1
Trichloroethylene; Trichloroethene	8260	7 days	N/A	0.5	ug/L	0.5	0.26	1
Trichlorofluoromethane; CFC-11	8260	7 days	N/A	5	ug/L	0.5	0.14	1
Vinyl acetate	8260	7 days	N/A	50	ug/L	50	15.3	1
Vinyl chloride; Chloroethene	8260	7 days	N/A	<0.022	ug/L	0.5	0.21	3
Xylene (total)	8260	7 days	N/A	5	ug/L	0.5	NA	1

<sup>3</sup> footnote: Compounds with "No RL" currently do not have a defined reporting level and are not subject to the thresholds in this order. Per the pdf titled "4050 SW 2025 02-11 IO R4-2024-0010-A01 Appendix 1 Reporting Limits"

**Identifiers:**

- a - typographical error; the listed compound name does not correspond to any valid analyte
- 1 - Enthalpy can currently meet the Reporting Limits specific in the Amended Order using existing, validated methods
- 2 - Analytes with Reporting Limits specified in the Amended Order may be achievable through method development
- 3 - Analytes with Reporting Limits in the Amended Order that Enthalpy cannot meet
- 4 - Analytes not included in Enthalpy's current reporting target list

**Notes:**

Methods 8290, 8141, 8151, RSK 175 are subcontracted tests.  
Where "Method" is blank, the compound is not currently reported or subcontracted by Enthalpy Analytical.

# **EXHIBIT 10**

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17 **BEFORE THE STATE WATER RESOURCES CONTROL BOARD**

18 In The Matter Of:

19 CHIQUITA CANYON, LLC  
20  
21 FOR REVIEW OF LOS ANGELES  
22 REGIONAL WATER QUALITY CONTROL  
23 BOARD INVESTIGATIVE ORDER NO. R4-  
24 2024-0010-A01

25 **DECLARATION OF KEVIN GREEN IN**  
26 **SUPPORT OF PETITION FOR**  
27 **REVIEW AND REQUEST FOR STAY**  
28 **OF ORDER AND HEARING**

I, Kevin Green, declare as follows:

1. I am the District Manager for Chiquita Canyon, LLC (hereinafter “Chiquita” or “Petitioner”). Chiquita is the owner and operator of the Chiquita Canyon Landfill.

2. In my role as District Manager, it is my responsibility to work with colleagues, experts, consultants, and commercial laboratories to implement orders and directives issued by governing regulatory agencies, including the State Water Resources Control Board (“State Board”) and Los Angeles Regional Water Quality Control Board (“Regional Board”).

1           3.       I have personal knowledge of the facts supporting the request for stay contained within  
2 the Chiquita’s Petition for Review and Request for Stay and Hearing of Investigative Order No. R4-  
3 2024-0010-A01 (as amended on February 11, 2026) (the “Petition”), and if called upon to do so, I  
4 could competently testify regarding the same.

5           4.       Chiquita Canyon Landfill (“Landfill”) is a 639-acre landfill that opened in 1972 and  
6 satisfied nearly a quarter of Los Angeles County’s municipal solid waste disposal needs before closing  
7 and ceasing to accept public waste effective January 1, 2025. Chiquita obtained ownership of the  
8 Landfill in 2009. The Landfill stopped accepting public waste effective January 1, 2025; however, it  
9 continues to operate as it tries to mitigate an ongoing underground reaction known as an Elevated  
10 Temperature Landfill event (“ETLF event” or “reaction”). As part of this process Chiquita operates  
11 under several regulatory orders.

12           5.       On March 20, 2024, as a result of this ETLF event, Chiquita received Investigative  
13 Order No. R4-2024-0010 from the Regional Board (“Investigative Order”). The Investigative Order  
14 required Chiquita to complete many tasks, many of which have been satisfied as of the date of this  
15 declaration. Such tasks included, without limitation, installing on-site and off-site groundwater  
16 monitoring wells and submitting numerous workplans and reports. The Investigative Order also  
17 included a number of ongoing compliance tasks, such as conducting quarterly groundwater monitoring  
18 and reporting. Under the Investigative Order, Chiquita is required to submit a storm event report within  
19 30 days of any storm event that produces a discharge into or out of the South Sedimentation Basin  
20 (South Basin). Chiquita continues to comply with these ongoing requirements.

21           6.       On February 11, 2026, the Regional Board issued the Investigative Order No. R4-2024-  
22 0010-A01 (the “Amended Order”) to Chiquita. The Amended Order expands upon the original  
23 directives outlined in the Investigative Order.

24           7.       I attest to the facts as stated in the Petition, and further attest that Chiquita will suffer  
25 substantial harm if a stay is not granted, and is already aggrieved by attempts to comply with  
26 substantial and unreasonable regulatory requirements. Chiquita is expending significant resources to  
27 attempt to comply with provisions of the Amended Order that I understand from our contracted  
28

1 laboratory, Enthalpy Analytics, are in some instances impossible to comply with. Enthalpy has  
2 informed Chiquita that it needs additional time to undergo method development to meet many of  
3 the Reporting Limits (“RLs”) in the Amended Order, and Chiquita needs time to identify other  
4 potential laboratories that may be able to meet many other RLs, though no laboratory has been  
5 identified to date which can meet all of the RLs required in the Amended Order. To date, Chiquita  
6 and its consultants have contacted at least nine (9) laboratories within a one-hundred fifty (150)  
7 minute drive of the Landfill, and none have indicated that it would be able to meet all of the  
8 new RLs required by the Amended Order.

9         8. As noted above, Chiquita already complies with several substantial regulatory  
10 requirements designed to prevent harm to public health or the environment. Chiquita’s contracted  
11 laboratory utilizes standard RLs and has Standard Operating Procedures that are consistent with and  
12 at times exceed industry standards. Further, Chiquita is already subject to stringent stormwater  
13 monitoring requirements pursuant to the Waste Discharge Requirements Order No. R4-2018-  
14 0172, National Pollutant Discharge Elimination System Industrial General Permit Order 2014-0057-  
15 DWQ, and an updated September 2025 Stormwater Pollution Prevention Plan. Based on this, there is  
16 no risk of substantial harm to other interested persons or to public interest if the stay is granted. Further,  
17 there are substantial questions of fact or law regarding the Amended Order given that it requires  
18 compliance with unreasonable and at times impossible standards.

19  
20 I declare under penalty of perjury under the laws of the State of California that the foregoing is true  
21 and correct. Executed this 13th day of March 2026 in Castaic, California.

22  
23 

24 \_\_\_\_\_  
Kevin Green  
District Manager