



Yana Garcia
Secretary for
Environmental Protection



Department of Toxic Substances Control

Meredith Williams, Ph.D., Director
7575 Metropolitan Drive, Suite 108
San Diego, CA 92108



Gavin Newsom
Governor

SUMMARY OF VIOLATIONS

On December 27, 2023, the California Environmental Protection Agency, Department of Toxic Substances Control (DTSC), conducted an investigation at:

Facility Name: Radford Alexander Corporation DBA Avalon
Facility Address: 14700 S. Avalon Boulevard, Gardena, CA 90248
EPA ID Numbers: CAL000069060, CAD983623794 **County:** Los Angeles

As a result of this investigation, DTSC discovered violations of the California Hazardous Waste Control Law and its implementing regulations that are identified on the attached pages. You must correct the following violations within the schedule for compliance for each violation. If you disagree with the alleged violations listed in this Summary of Violations, you must inform DTSC in writing. If additional violations are found after this investigation, such violations, if any, will be identified in writing.

DTSC will provide you with a complete investigation report within 65 days of the date of this investigation. You may request a meeting with DTSC to discuss the investigation, investigation report, or this Summary of Violations. The issuance of this Summary of Violations does not preclude DTSC from taking administrative and/or civil action or from referring the matter for criminal prosecution as a result of the violations identified herein or violations that have not been corrected within the time specified by DTSC. Failure to comply with a schedule for compliance is a violation of the law subject to a civil penalty of up to \$70,000 for each day of noncompliance. In addition, a false statement that compliance has been achieved is a violation of the law and subject to a penalty of up to \$70,000 for each occurrence. DTSC may re-investigate this facility at any time.

Facility Representative Accepting
Summary of Violations

Name: _____
Signature: _____
Title: _____
Date: _____

DTSC Representative

Name: Erin Neal
Signature: *Erin Neal*
Title: Environmental Scientist
Date: 03/01/2024



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SUMMARY OF VIOLATIONS

Facility Name: Radford Alexander Corp. DBA Avalon Date: 03/01/2024

SECTION I: NON - MINOR VIOLATIONS AND REQUIRED CORRECTIVE ACTION (Violations not considered Minor Violations)

You must correct the following violation(s) within the specified time frame for each violation.

Violation # 1

Violation Citation:

Health and Safety Code (HSC) section 25201(a)

Except as provided in subdivisions (c) and (d), no owner or operator of a storage facility, treatment facility, transfer facility, resource recovery facility, or disposal site shall accept, treat, store, or dispose of a hazardous waste at the facility, area, or site, unless the owner or operator holds a hazardous waste facilities permit or other grant of authorization from the department to use and operate the facility, area, or site, or the owner or operator is operating under a permit-by-rule pursuant to the department's regulations, or a grant of conditional authorization or conditional exemption pursuant to this chapter.

Description:

On and/or before December 27, 2023, Radford Alexander Corporation DBA Avalon (Avalon) accepted 4,600 gallons of hazardous waste leachate from Chiquita Canyon, LLC on non-hazardous waste manifest #NH004695. Avalon collected split samples from the tanker truck carrying this leachate from Chiquita Canyon Landfill. One sample was provided to the Los Angeles County Fire Department, Health Hazardous Materials Division (County of Los Angeles Certified Unified Program Agency) and the other was kept by Avalon for analysis. DTSC Environmental Scientist Erin Neal and Supervising Environmental Scientist Zana Zmily were present during sampling of the tanker truck. Avalon sent the lab results to DTSC on January 31, 2024. These results show that the leachate sampled from the truck exceeded the Toxicity Characteristic Leaching Procedure (TCLP) regulatory limit for benzene of 0.5 milligrams per liter (mg/L), reporting 0.538 mg/L. Avalon is not permitted by DTSC as a treatment, storage, and disposal facility for hazardous waste; Avalon does not have any other grant of authorization from DTSC to use and operate the facility, area, or site; nor is Avalon operating under a permit-by-rule, grant of conditional authorization, or conditional exemption.



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Violation Classification:

This is a class 1 violation.

Compliance Requirement:

Avalon shall not accept off-site generated hazardous waste without a permit or other grant of authorization. Within 30 days of issuance of this Summary of Violations, Avalon shall provide a written explanation of how the facility will ensure off-site generated waste accepted at its facility is not hazardous waste.

Violation # 2

Violation Citation:

HSC section 25189.2(d)

A person who treats or stores, or causes the treatment or storage of, a hazardous waste at a point that is not authorized according to this chapter, shall be liable for a civil penalty not to exceed seventy thousand dollars (\$70,000) for each separate violation or, for continuing violations, for each day that the violation continues.

Description:

On and/or before December 27, 2023, Avalon treated and stored 4,600 gallons of hazardous waste leachate originating from Chiquita Canyon, LLC. 4,600 gallons of waste leachate was sent on non-hazardous waste manifest #NH004695 to Avalon for treatment and disposal. Avalon confirmed that this load was processed at their facility. Avalon is a wastewater treatment facility that has been accepting waste leachate from Chiquita Canyon Landfill. Leachate is treated through Avalon's organic Subcategory C wastewater treatment process, which includes filtration and granular activated carbon adsorption. Once treated, this wastewater is discharged to the Los Angeles County sewer. Avalon is not permitted, or otherwise authorized, by DTSC as a treatment, storage, and disposal facility for hazardous waste. Avalon does not have a hazardous waste treatment permit with, or other form of authorization from, the local CUPA.

As discussed in violation 1, the leachate sampled from the tanker truck was in exceedance for benzene, reporting 0.538 mg/L. This is above the TCLP regulatory limit for benzene of 0.5 mg/L.

Violation Classification:

This is a class 1 violation.

Compliance Requirement:

Avalon shall not store off-site generated hazardous waste and/or treat hazardous waste without a permit or other grant of authorization.



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SECTION II: OTHER ISSUES/CONCERNS

The following issues/concerns were identified during this investigation. Further research may identify additional violations. Any new violations, with the prescribed corrective action and schedule for compliance, will be identified in the Violation section of the investigation report.

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1. The Los Angeles County Fire Department also ran lab analyses on the split sample collected from the tanker truck at Avalon on December 27, 2023. The lab report for the TCLP analysis states that the sample was received by the lab outside of the holding time and the sample was prepared outside of the preparation holding time.