



**LOS ANGELES COUNTY  
SANITATION DISTRICTS**  
*Converting Waste Into Resources*

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March 4, 2026  
File: 08/26-12874  
Facility ID: 1947894

Reid Lathan  
Chief Operating Officer  
ChemTrans  
14700 South Avalon Boulevard  
Gardena, CA 90248

Dear Reid Lathan:

**Outcome of Compliance Meeting  
Enforcement Action Number 0205996  
Violation of Industrial Wastewater Discharge Regulations at  
ChemTrans IW 012874 – 14700 S. Avalon Boulevard, Gardena, CA, 90248**

To seek resolution of multiple violations of your facility's Industrial Wastewater Discharge Permit (Permit No. 012874), a mandatory compliance meeting was held on January 21, 2026, at the Los Angeles County Sanitation Districts' (LACSD) Joint Administration Office (JAO) in Whittier, CA. ChemTrans was represented by Reid Lathan, Alon Lebel (Consultant), and Neill Brower (ChemTrans Counsel). LACSD was represented by Alicia Barrera, Jyoti Banaji, Bill Barnum, John Chung, Robert Kwong (LACSD Counsel), Andre Schmidt, Andrew Woods, and Sue Zhu. ChemTrans is a nonhazardous Centralized Waste Treatment (CWT) facility. LACSD accepts ChemTrans' attendance at this compliance meeting as equivalent to the required written response to notice of violation (NOV) enforcement action number (EAN) 0206203. This letter summarizes the compliance meeting and sets forth corresponding regulatory actions toward resolving multiple industrial wastewater discharge violations from this facility.

**I. Violations of Permit Limits for Certain Constituents**

ChemTrans IW 012874 has three legal sampling points (LSPs): A, B, and C. Pursuant to the approval of the permit amendment dated December 31, 2025, ChemTrans is currently permitted to receive the following waste streams:

- A. final effluent LSP-A receives wastewater from LSP-B and LSP-C, and food wastewater;
- B. upstream LSP-B receives interior and exterior of truck wash and boiler blowdown (dilution flow); and
- C. upstream LSP-C is permitted for CWT Subcategory – C for organic wastewater.

With the December 31, 2025, permit amendment, Subcategory – A wastewater (e.g. metals) was removed from the permitted waste streams at ChemTrans' request.

- More specifically, during the compliance meeting we discussed ChemTrans' violation of permit limits for:
- (1) p-Cresol, 2,4,6-Trichlorophenol, and pH at LSP-C;
  - (2) pH and total zinc effluent at LSP-B; and
  - (3) p-Cresol and pH as measured in the public sewer.

Additional and related violations include ChemTrans' failure to provide LACSD inspector access to its facility and the lack of a pacing socket. Details for these violations are provided in LACSD's December 16, 2025, letter regarding the compliance meeting, which is incorporated herein by reference.

## **II. Need for Improved, Unconditional Access to ChemTrans Facility for LACSD Inspectors**

Currently, inspection staff are required to sign in at the facility office, then wait for facility staff to escort them to the LSPs. This entry and access protocol delays LACSD staff taking samples by up to 15 minutes. This level of delay is unacceptable and impedes LACSD inspectors from taking timely and representative samples from the LSPs without the unnecessary delay or opportunity for any tampering. ChemTrans acknowledged the site access issues identified by LACSD staff and agreed to the following changes to the entry/access protocol, effective immediately:

- A. At any time that the facility is open, in operation, or discharging wastewater to the public sewer, or at any other reasonable time as provided in Section 206 of the LACSD Wastewater Ordinance, LACSD staff may access the facility and all three LSPs via the gate located at 14700 Avalon Blvd, Gardena, CA 90248, approximately 25 feet south of the main vehicular entrance gate for the facility office. Access may be provided by adding a LACSD padlock to the locking mechanism currently used for the gate (chain or bar).
- B. LACSD inspection staff agree to sign in on the log located at the side gate.
- C. LACSD inspection staff agree to call the posted telephone numbers to inform ChemTrans personnel of their arrival. If ChemTrans staff does not answer the LACSD inspection staff after six rings, LACSD inspection staff may proceed directly to the LSPs. LACSD may leave a voicemail message with ChemTrans if voicemail is available before the 6<sup>th</sup> ring.
- D. LACSD and ChemTrans agree that a ChemTrans escort will only be needed to access restricted (non-LSP) areas of the facility.

## **III. Necessary Actions to Address p-Cresol Violations**

Despite ChemTrans' prescreening of all trucks entering the facility for odor, pH, solids and sulfides, and ChemTrans' preventative efforts to ensure the granular activated carbon (GAC) was operating at its highest efficiency following the May 2025 violations, ChemTrans violated the p-Cresol limit again in September and November 2025.

Therefore, ChemTrans must:

- A. submit its GAC changeout log for LACSD review;
- B. submit its monitoring data associated with monitoring breakthrough of the GAC vessel for LACSD review;
- C. submit invoices showing disposal of spent GAC and replacement of new or regenerated GAC for LACSD review; and
- D. electronically transmit real-time flow and pH monitoring data to LACSD.

## **IV. Expiration of Industrial Wastewater Discharge Permit**

Without an approved industrial wastewater discharge permit renewal application from the Los Angeles County Department of Public Works (LACDPW) and LACSD, the current permit for ChemTrans operations will expire on August 22, 2026. ChemTrans is hereby notified that if LACDPW does not approve ChemTrans' permit renewal application prior to the permit expiration date, LACSD will not renew the industrial wastewater discharge permit for ChemTrans and ChemTrans' current wastewater discharge permit will expire. Under these circumstances, ChemTrans would not be allowed to discharge any wastewater to the LACSD sewer system from its facility.

## **V. Exceedance of Permitted Daily Average Flow Limit of 50,000 gallons per day**

Although ChemTrans submitted an application to LACDPW in September 2023 to increase their facility's daily average flow limit to 100,000 gpd and paid the corresponding connection fee to LACSD in December 2023, LACSD has not issued a final approval for the requested increase in daily average flow because LACSD's permit approval is contingent upon LACDPW review and final approval. And although LACSD has allowed ChemTrans to discharge at the higher flow rate on an interim basis since ChemTrans' application and fee payment, ChemTrans' failure or inability to obtain formal and final approval for this higher flow rate from the local agency (LACDPW) is sufficient grounds<sup>1</sup> for the termination of the interim allowance to discharge at the higher flow rate and enforcement of the 50,000 gpd daily average flow limit. This action is supported and reinforced by the facts and analysis in the following sections.

## **VI. Final Zoning Enforcement Order from Los Angeles County Department of Regional Planning**

The Los Angeles County Department of Regional Planning (Regional Planning) zoning enforcement case against ChemTrans, which resulted in a final zoning enforcement order (FZEO) on August 6, 2025, indicates that ChemTrans does not have the required land use permit for its CWT activities. Regional Planning has directed ChemTrans to cease activities and operations related to its sewage treatment facility and sewage disposal facility within 12 months of the written decision or by August 6, 2026. The written decision further states that if ChemTrans completes a Regional Planning application for a conditional use permit (CUP) within 12 months of the written decision, this would allow retention of the necessary waste treatment facilities during the application period. ChemTrans informed LACSD that they submitted the CUP application to Regional Planning and have not received a response or completeness determination from Regional Planning. So, from LACSD's perspective, ChemTrans is operating without the necessary land use permits, and this will likely have a negative impact on any further permitting by LACSD.

## **VII. Minor Compliance Issues**

ChemTrans stated that they added caustic injection to their pretreatment system "a few months ago", which has resolved the pH violations. They pointed out that the last pH violation occurred in May 2025 and that there have not been any additional pH violations since then.

ChemTrans stated that they investigated the source of the zinc violation and determined it was caused by leachate received from El Sobrante Landfill. They stated that they are no longer accepting leachate from El Sobrante Landfill until they can prove that they are in compliance.

The failure of ChemTrans to comply with discharge guidelines for flow measurements by not having a functional pacing socket (Violation Date September 16, 2025; Violation ID 823903) was not discussed during the meeting. LACSD has recently confirmed that the facility now has a functional pacing socket, thereby resolving this violation.

## **VIII. Relevant Post-Compliance Meeting Developments**

US EPA notified LACSD that, on January 30, 2026, it extended the Off-Site Rule Emergency Exemption for Chiquita Canyon Landfill (CCL) for the disposal of leachate for various facilities, including ChemTrans (or Avalon Environmental Services). The Emergency Exemption extension included the following terms for the disposal of

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<sup>1</sup> Due to the lack of approval from LACDPW for the application to increase the flow limit for more than 21 months since LACDPW requested that LACSD return the application in May 2024, Regional Planning's determination that ChemTrans does not have the required land use permits for its current activities pending the outcome of the CUP application, the EPA's condition that CCL's disposal of leachate to ChemTrans may not cause ChemTrans to exceed its permitted flow limit, and recent complaints from the public for odors verified to be from ChemTrans' facility, LACSD has determined that it is reasonable and necessary to begin enforcing the permitted daily average flow limit of 50,000 gpd.

CCL leachate at ChemTrans: “CCL’s disposal of leachate to Avalon may not cause Avalon to exceed any requirements of Avalon’s permits, including Avalon’s Industrial Wastewater Discharge Permit No. 012874, as amended (“Industrial Wastewater Permit”), including but not limited to the maximum daily flow limitations.” Emphasis added.

Regional Planning notified LACSD that odor complaints were submitted to the South Coast Air Quality Management District (SCAQMD) on December 26, 2026, and that SCAQMD followed up on the complaints and determined that the odors were coming from ChemTrans’ facility. SCAQMD notified Los Angeles County Supervisor Holly Mitchell’s Office of the odor complaints, including that SCAQMD verified the odors at ChemTrans’ facility and reviewed records reflecting that a load of leachate was received from CCL around the time that the odor complaints were received. Regional Planning also notified LACSD that they received an additional odor complaint about the facility on February 6, 2026, from a parent at a nearby school or sensitive receptor.

### **IX. Post-Compliance Meeting Requirements Imposed on ChemTrans**

Based upon the foregoing analysis and determinations, LACSD imposes the following compliance requirements and mandates on the ChemTrans (IW 012874) facility:

#### **1) Effective Immediately**

- a. At any time that the facility is open, in operation, or discharging wastewater to the public sewer, or at any other reasonable time as provided in Section 206 of the LACSD Wastewater Ordinance, LACSD staff may access the facility and all three LSPs via the gate located at 14700 Avalon Blvd, Gardena, CA 90248, approximately 25 feet south of the main vehicular entrance gate for the facility office. Access may be provided by adding a LACSD padlock to the locking mechanism currently used for the gate (chain or bar).
- b. LACSD inspection staff agree to sign in on the log located at the side gate.
- c. LACSD inspection staff agree to call the posted telephone numbers to inform ChemTrans personnel of their arrival. If ChemTrans staff does not answer the LACSD inspection staff after six rings, LACSD inspection staff may proceed directly to the LSPs. LACSD may leave a voicemail message with ChemTrans if voicemail is available before the 6th ring.
- d. LACSD and ChemTrans agree that a ChemTrans escort will only be needed to access restricted (non-LSP) areas of the facility.

- 2) **By April 3, 2026** – ChemTrans shall submit for the period January 1, 2025, to February 28, 2026, all maintenance logs showing when the GAC was changed out, all monitoring data associated with monitoring breakthrough of the GAC vessel, and invoices showing disposal of spent GAC and replacement of new or regenerated GAC.
- 3) **By April 3, 2026** – ChemTrans shall submit data (log) showing the number of loads received per day for the period May 1, 2025, to February 28, 2026. The log must also include the source of each load, volume, and corresponding waste profile.
- 4) **By April 17, 2026** – ChemTrans must submit five (5) consecutive business days of compliance samples during normal operations for LSP-C for pH, o-Cresol, p-Cresol, and 2,4,6-Trichlorophenol. An LACSD approved State certified laboratory must analyze these samples using EPA approved methodology listed in 40 CFR Part 136. pH must be measured within 15 minutes of sample collection.

A detailed log of the batches treated and discharged for the sample point during the five consecutive days must be submitted along with the compliance samples. Treated batches must be representative of the typical loads treated at the facility during normal operation, including the loads treated when the p-Cresol violations listed in the December 16, 2025 compliance meeting letter occurred. The sample results shall be submitted to the attention of Jyoti Banaji.

ChemTrans must notify LACSD at least three business days in advance of collecting the first of the five consecutive days of the compliance samples. LACSD will conduct simultaneous sampling for comparison. This notification may be sent via email to LACSD Industrial Waste Section staff persons Jyoti Banaji at [jbanaji@lacsds.org](mailto:jbanaji@lacsds.org) and Bill Barnum at [bbarnum@lacsds.org](mailto:bbarnum@lacsds.org).

- 5) **By April 17, 2026** – ChemTrans must submit five (5) consecutive business days of compliance samples during normal operations for LSP-A for pH, Soluble Sulfides, and Total Zinc. An LACSD approved State certified laboratory must analyze these samples using EPA approved methodology listed in 40 CFR Part 136. A 24-hour composite sample is required for Zinc analysis. The sample results shall be submitted to the attention of Jyoti Banaji.

ChemTrans must notify LACSD at least three business days in advance of collecting the first of the five consecutive business days of the compliance samples. LACSD will conduct simultaneous sampling for comparison. This notification may be sent via email to LACSD Industrial Waste Section staff persons Jyoti Banaji at [jbanaji@lacsds.org](mailto:jbanaji@lacsds.org) and Bill Barnum at [bbarnum@lacsds.org](mailto:bbarnum@lacsds.org).

- 6) **By August 22, 2026** – ChemTrans shall submit a detailed plan for implementing real-time electronic transmission of continuous monitoring data for pH and flow to LACSD. LACSD staff are available to meet with ChemTrans to further discuss this requirement.
- 7) **Effective Immediately** – ChemTrans shall not exceed the permitted daily average flow limit of 50,000 gpd based on a quarterly averaging period that corresponds with the self-monitoring reporting period. Flow meter totalizer readings shall be submitted with the quarterly SMR to verify compliance with this requirement. Flow data for days prior to receipt of this letter will be disregarded for the compliance determination of the next quarterly SMR submittal.

LACSD expects ChemTrans to comply with the foregoing compliance terms to address industrial wastewater discharge permit violations at the above-referenced location. And LACSD reserves all legal and equitable rights to take additional and further enforcement action as necessary in this matter.

If you have any further questions regarding this matter, please contact Senior Engineer Jyoti Banaji at extension 2906.

Very truly yours,



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Industrial Waste Manager  
Industrial Waste Section

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