

SUNSHINE CANYON LANDFILL

June 1, 2017

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Subject: Report to the Joint Sunshine Canyon Landfill Technical Advisory Committee
SCL TAC Meeting Date - June 13, 2017

Dear Ms. Webber and Mr. Sanabria:

This report provides an update of items requested to be included in the report to the Joint Sunshine Canyon Landfill Technical Advisory Committee (TAC) for the meeting to be held on June 13, 2017.

1.0 Cell Development

1.1 Cell CC-4, Part 1

The Design Report for Cell CC-4, Parts 1 – 5 was submitted to the LARWQCB on December 16, 2015. By letter dated April 26, 2016, approval for the construction of Cell CC-4 was received (Attachment A). Approval for disposal operations in Cell CC-4 Part 1 was received from the LARWQCB on March 23, 2017 (Attachment A), and disposal operations in this cell commenced on March 24, 2017. CC-4, Part 1, is an 8-acre cell that will provide 5.3M CY of disposal capacity.

Excavation for the preparation of the subgrade for Cell CC-4 Part 2 began on April 11, 2017 and is expected to be completed by the first week of June 2017; liner activities will commence and are scheduled for completion by the end of July 2017. Construction of Cell CC-4 Part 2 was moved up from 2018 as part of the site's overall commitment to odor mitigation. Cell CC-4 Part 2 is a 6-acre cell adjacent to Cell CC-4 Part 1 and will provide approximately 10.76 million cubic

yards of disposal capacity. Construction and operation of this cell will keep daily operations toward the middle of the site.

2.0 Fill Sequence, Soil Usage, Stockpile/Borrow Areas and Disposal on County Top Deck

2.1 Fill Sequence

From January 2017 through the end of May 2017, fill operations have been conducted in Cell CC-3A, Part 2, Cell CC-3B and areas on the County deck. As noted previously, fill operations commenced in Cell CC-4, Part 1 on March 24, 2017. The majority of disposal operations will continue in Cell CC-4 Part 1 throughout the remainder of 2017 as well as in Cell CC-4 Part 2 when it is approved for operations.

2.2 Soil Usage

Prior to the implementation of the daily cover (ADC) pilot study using a geosynthetic panel product (EnviroCover) in October 2015, approximately 30% of site soil was used for daily cover and projects requiring soil. Based on soil usage logs, approximately 20.5% of site soil is now used for daily cover and projects requiring soil.

2.3 Stockpile/Borrow Areas

Placement and subsequent removal of stockpile material is an operational activity that occurs over the life of the landfill. There are three stockpile areas on site that have been designated for such purpose. These stockpile areas are shown on the figure included in Attachment B.

3.0 Landfill Gas Collection and Control System

Improvements to the site's landfill gas collection and control system (GCCS) are conducted on an annual basis. These improvements include the installation of vertical and horizontal gas collection wells, the installation of new, state of the art flare systems (Flares 9 and 10), and a robust monitoring and operations and maintenance program. Summaries of these activities have been provided in prior TAC reports.

The following is a summary of the GCCS activities that have recently been completed or are currently in progress:

- Installation of 153 new or replacement vertical gas extraction wells;
 - Drilling activities commenced in January 2017 and were completed at the end of May 2017
- Installation of dewatering pumps in gas wells affected by liquids;
 - As of the date of this report, 253 dewatering pumps have been installed;
 - Includes the installation of air and condensate lines;

- Construction of a liquid handling system to accommodate the increased volume of liquids being generated as a result of the number of dewatering pumps installed in gas collection wells;
- Receipt of the Permit to Construct/Permit to Operate for Flare 11;
 - Flare 11 is another 5,000 scfm ultra-low emission flare;
 - Scheduled for construction during the 3rd quarter of 2017.

Although these are the primary construction activities conducted for the site's GCCS, the robust operations and maintenance program is also on-going to ensure all components of the GCCS are working effectively and efficiently. Republic Services continues to conduct twice monthly gas well monitoring and tuning of the wellfield. Additional work on the site's GCCS may be conducted in 2017 based on site monitoring and evaluation of data.

3.1 Landfill Gas Monitoring

3.1.1 Wellhead Monitoring

Monitoring of the site's landfill gas collection system is conducted in accordance with Federal NSPS (New Source Performance Standards) which require readings of pressure, temperature and oxygen be taken on a monthly basis from each monitoring point. Bi-monthly monitoring of the entire wellfield began in July 2011; this bi-monthly monitoring schedule remains in effect.

3.1.2 Surface Emission Monitoring

Monthly surface emission monitoring (SEM) is conducted in accordance with SCAQMD Rule 1150.1 requirements. SEM monitoring consists of instantaneous and integrated monitoring conducted over an approved grid system established over the site. Each grid is 50,000 square feet or approximately 1.2 acres. A summary of the results of the instantaneous and integrated SEM conducted for the first quarter 2017 (January, February and March 2017) is as follows:

- Instantaneous SEM monitoring: the City side of the landfill had 99 locations over total of 684 grids monitored showing surface emissions over 500 ppm Total Organic Carbon (TOC); the County side of the landfill had 130 locations over a total of 477 grids that had surface emissions over 500 ppm TOC. These locations were repaired and re-monitored in accordance with SCAQMD Rule 1150.1. Each

of the locations passed either the first or second 10-day re-check as allowed by Rule 1150.1;

- Integrated SEM monitoring: the City side of the landfill had 71 grids out of a total of 684 grids monitored that showed results over 25 ppm TOC. The County side of the landfill had 46 grids out of a total of 477 grids that showed results over 25 ppm TOC. The grids were repaired and re-monitored in accordance with Rule 1150.1. Each of the grids passed either the first or second 10-day re-check as allowed by Rule 1150.1.

3.2 Perimeter Probe Monitoring

Rule 1150.1 monitoring requires monthly monitoring of the site's perimeter probes. There were no probes that exceeded the regulatory threshold of 5% methane (%CH₄) during the first quarter of 2017.

4.0 Development of Gas-to-Energy Facility (City/County)

Sunshine Gas Producers, L.L.C. (SGP) is the owner and operator of the turbine power plant. The power plant began commercial power generation on September 1, 2014 and currently places approximately 18.5 MW of renewable energy on the grid. The plant consists of five (5) Solar Mercury turbines rated at 4.6 MW each. Significant milestones related to this project include the following:

- Air permit issued to DTE Biomass Energy in April 2012;
- Building permit received from LA County in June 2013;
- SCE began construction of their substation in August 2013; construction was completed in November 2013;
- Four new 66kV line poles were installed in October 2013 and stringing of the line was completed in December 2013;
- Commercial operations of the power plant began on September 1, 2014.

5.0 Groundwater Monitoring (City/County)

The groundwater monitoring program approved by the LA RWQCB for Sunshine Canyon Landfill is based on quarterly and semi-annual monitoring of 18 groundwater monitoring wells. Samples are analyzed by an EPA-approved analytical laboratory for more than 100 individual potential contaminants as specified by the approved monitoring program.

Statistical analyses are used to identify any trends or changes in concentrations of constituents that could indicate a potential release from the site. In addition to the groundwater wells, samples are collected from sub-drains and lysimeters. Reports of sampling and monitoring activities, including all analytical results, are submitted to the LA RWQCB on a semiannual and annual basis.

5.1 Summary of Results of Second Semi-Annual Groundwater Monitoring Period of 2016

During the second semiannual 2016 monitoring period, environmental monitoring was conducted on a quarterly basis during September (third quarter) and December (fourth quarter). The results were generally similar to past monitoring event results, as most analyte/well pairs were previously in tracking mode.

During the second semiannual 2016 monitoring period, several VOCs were detected in the first and second quarter samples collected from Subdrain N and Combined Subdrains. These findings are consistent with historical results, and as a result, the liquids collected at the subdrains are conveyed to the water treatment system prior to reuse.

Lysimeters LY-6 and LY-7 are sampled on a quarterly basis, lysimeter LY-6 was dry during both sampling events. The pump in lysimeter LY-7 was inoperable during the fourth quarter 2016 monitoring period therefore this location could not be sampled. The third quarter 2016 sample from lysimeter LY-7 contained seven VOCs at quantifiable concentrations. The types of concentrations of detected VOCs were similar to historical results for this monitoring point.

6.0 Leachate Collection and Treatment System (City/County)

Leachate is collected in the leachate collection system installed beneath the City and County portions of the site. Leachate is collected in a gravel-packed riser sump at the low point of each area, and pumped via extraction pumps to the influent tank at the leachate treatment facility (LTF). The site produces about 10,000 – 15,000 gallons per day (gpd) of leachate.

LTF Process Description

The LTF treatment system did not change operationally during the first quarter of 2017. The LTF treatment system consists of filters and granular activated carbon (GAC) vessels. The leachate first passes through the bag filter units, to remove suspended matter from the leachate and protect the GAC media from clogging which could reduce the treatment capacity and performance.

The filtered leachate then undergoes treatment in three GAC vessels, which are configured in series. The second and third GAC vessels serve as polishing units,

ensuring effective removal of low level VOCs. The effluent routinely meets the WDR limits for VOCs.

The treated effluent from the third GAC vessel is routed to the effluent tank where it is conveyed by gravity to the gray water tank at the gray water treatment system. The treated effluent is blended with other site waters. The treated effluent from the gray water system is then pumped to two storage tanks; one 265,000 gallon tank and one 100,000 gallon tank. These tanks are used for temporary storage prior to the treated effluent being used on-site for dust control and irrigation. The gray water used onsite routinely meets the WDR limits, and is in compliance with the site's WDRs. Approximately 120,000 -150,000 gpd is processed in the gray water treatment system and re-used on site for dust control.

6.1 Upgrades to Aboveground Collection System

A comprehensive upgrade to the aboveground liquid collection/discharge system for the removal of liquids from vertical gas collection wells affected by liquids began in December 2016. This project was necessitated by the increased liquids being generated as a result of the increased number of pumps installed in gas wells to extract liquids. This upgrade includes the purchase and installation of a new air compressor and the design and installation of the piping system to connect the liquid extraction pumps to the discharge system.

As part of these upgrades, 16 liquid storage tanks have been staged on site to ensure sufficient storage capacity for site liquids before they are either discharged to the sewer, treated for use as dust control water or taken off-site for disposal. The storage tanks are staged on an area on City North in an area constructed with a berm and an all-weather road to ensure site trucks and off-site trucks have access during all conditions.

An evaluation of the site's liquid management program is currently underway. This evaluation is being done to develop an overall long-term management plan for site liquids.

7.0 Surface Water Management System, Including Drainage and Erosion Control (City/County)

Management of surface water from the site and the substantial upland non-landfill area that drains to it is a major part of the site's environmental compliance and operational programs.

Functions of the surface water management system include the following:

- Prevent or minimize erosion from the landfill surface;

- Prevent discharge of sediments from the site in excess of regulatory standards;
- Maintain peak stormwater discharges at levels no greater than the pre-landfill condition of the site; and,
- Manage the 100-year, 24 hour storm as required by Title 27 of the California Code of Regulations (CCR).

The surface water management system at Sunshine Canyon has been designed according to requirements of CCR Title 27 and the County of Los Angeles. Its major components were evaluated in the Joint Technical Document for the City/County Landfill, and determined to be in conformance with all requirements.

7.1 Existing Stormwater Management System

The existing surface water management system at Sunshine Canyon consists of three subsystems of drainage controls:

- Permanent Perimeter Drainage System;
- Interim Interior Drainage System; and
- Temporary Erosion and Sediment Control Measures

Elements of each system are described below. Elements of permanent drainage facilities at the site as well as some interim facilities such as concrete drainage channels, are shown on the figure included in Attachment C.

7.1.1 Permanent Perimeter Drainage System

The perimeter drainage system is comprised of the major permanent control systems for the landfill. It intercepts all run-on of surface water from non-landfill areas and diverts it away from the landfill area, and manages runoff from landfill areas where refuse elevations are above the site perimeter drainage elevations. Existing elements of the perimeter system include the following, all of which have been designed to handle the peak discharge from a 100-year, 24-hour storm:

- Sedimentation Basin D, located at the far north end of the County area, which receives run-on from the native canyons north of the landfill area;
- Sedimentation Basin B, located on the east side of the County area, which receives runoff from the native East Canyon area and from portions of the landfill area. Basin B is concrete-lined and has a discharge structure designed to level out peak discharges of stormwater;

- Sedimentation Basin A, located on the west side of the County area, which receives run-on from slope and canyon areas west of the landfill area, and runoff from portions of the landfill area on the County side. Basin A is lined with concrete;
- East Perimeter Drainage Channel is currently completed from Basin D to the Terminal Basin. The final phase of this channel improvement was completed in September 2012;
- Terminal Sedimentation Basin, located near the site entrance at San Fernando Road. All surface water discharge from the site passes through this concrete-lined basin, which is designed to manage the peak flow from the 100-year storm and discharge no greater flow than the pre-landfill condition of the site.
- West Perimeter Drainage Channel is currently completed from Basin D to Basin A. It presently discharges to the interim interior drainage system, as described in the following section. When completed, the West Perimeter Drainage Channel will collect all drainage from the west side of the Closed City Landfill and discharge directly to the Terminal Basin. Approval of the Revised West Drainage Channel Master Plan was received from the LARWQB by letter dated October 24, 2016 (Attachment D). Comments on the West Drainage Channel Master Plan were received from DPW on June 15, 2016 (Attachment D). Since the construction of the West Perimeter Drainage Channel cannot be implemented until the CC4 Stability Berm is in place, no action has been taken to date to address the comments from DPW. As soon as the CC4 Stability Berm project is approved by DPW, the schedule for the construction of the West Drainage will be assessed and DPW's comments will be addressed.

7.1.2 Interim Interior Drainage System

Until all areas of the City/County Landfill have been developed and filled to elevations above the site perimeter, run-off from areas of the site interior must be managed in a system of basins and channels discharging through the center of the site to the Terminal Basin. At present, this includes the entire west side of the Closed City Landfill, currently areas of Cells CC-1, CC-2, CC-3 and CC-4 Part 1 and most of Cell A. The interim interior system is modified to accommodate ongoing construction activity. Construction includes drainage elements to ensure stormwater is directed to existing stormwater conveyance systems which ultimately discharge to the Terminal Basin.

The interim interior drainage system consists of an asphalt and concrete-lined trapezoidal channel which runs along the western side of the main haul road. This channel discharges to a box culvert which directs discharge from the trapezoidal channel along the temporary Phase 1 By-Pass Road that discharges to the Terminal Basin.

The drainage system for the Closed City Landfill features one large shallow sedimentation basin and a series of semi-permanent and temporary channels that collect runoff and convey it to the primary interior drainage channel described above. In the future, this system will discharge to the West Perimeter Drainage Channel.

7.1.3 Temporary Erosion and Sediment Control Measures

Temporary erosion control systems are installed on an annual basis in advance of the rainy season. A drainage plan is prepared annually which includes a variety of measures that not only reduce soil erosion but also reduce peak flows by slowing down and leveling discharges from the site. These measures include the following:

- Removal of deposited silt in site basins and drainage channels;
- Removal of deposited silt in Terminal Basin;
- Removal of rock filter around risers in Terminal Basin and replacement with new rock filter;
- Removal of old filter material around risers in Terminal Basin and replacement with new filter material;
- Grading benches to promote positive drainage;
- Removal of vegetation from pipes and inlets;
- Installation of temporary geosynthetic downdrain channels and chutes where required on the active fill area slopes;
- Installation of a geosynthetic-lined stormwater retention basin;
- Installation of a grated road crossing on paved entry road to separate runoff flows from vehicle traffic;
- Installation of a gabion check dam in the Terminal Basin;
- Installation of Filtrex compost rolls along the toe of the slopes of City South and toe of the slope of Cell CC-3B adjacent to the haul road;
- Installation of erosion control blankets on the finished slopes south of Cell CC-3B;
- Construction of an earthen berm and sediment basin south of active fill area CC-3B and two concrete-lined channels to manage stormwater flow from this basin to the Terminal Basin;
- Grading of the finished slope for future Flare 11 including the installation of straw wattles, jute matting and hydroseeding.

Temporary erosion and sediment control measures are installed by October 1st each year. After each rain event, erosion and sediment control measures are inspected and evaluated, and repairs are made as

needed prior to the next rain event. Based on the effectiveness of the control measures provided above, these same measures will be implemented prior to the 2017 – 2018 wet weather season. Gabion cages installed in the concrete-lined channel adjacent to the haul road will be assessed to determine whether these will be included. Based on the rain event of January 20, 2017 during which a portion of the channel flooded due to the decreased capacity taken up by the gabions, the accumulation of sediment from the multiple storms prior to January 20th, and the extremely heavy rain event (1.7 inches in 2 hours) (Attachment E), the number of gabions could be reduced or may not be placed in this portion of the channel at all.

8.0 Current Odor Control Mitigation Measures (City/County)

This section provides an overview of the odor control mitigation measures that have been on-going as well as providing the current status of items related to the following regulatory actions:

- SCAQMD Order to Abate, Case 3448-14, signed on December 15, 2016;
- Los Angeles County Department of Regional Planning, Notice of Violation
- Los Angeles County Department of Public Health

8.1 On-Going Odor Control Measures

- Odorous load management program;
- The procedures for the minimization of odors and emissions during installation and trenching of vertical wells and horizontal collectors remain in effect. These procedures are being followed by all SCL contractors when they are performing work that involves the installation of wells and/or trenching for the installation of horizontal collectors;
- The four DustBoss systems remain in use;
- Operation of seven (7) Buffalo Monsoon misting units;
- Operation of vapor odor control systems;
- Operation of a misting system on the wind fences that are placed at the working face.

8.2 SCAQMD Stipulated Order for Abatement

On December 15, 2016, a Stipulated Order for Abatement (Order) (Case 3448-14) was approved by the SCAQMD Hearing Board and subsequently signed on January 10, 2017. The Order requires Republic Services to implement programs and processes for the purpose of mitigating conditions contributing to the alleged odor nuisance. The following presents a brief summary of each of the conditions contained in the Order and the status of each condition.

Condition 1: Requires the submittal of a Traffic Mitigation Program that establishes a program to address unnecessary truck trips and reduce queuing of trucks outside the Facility potentially resulting from the change in operational hours.

Status: The Traffic Mitigation Program was submitted to the Los Angeles City Department of Transportation, SCAQMD, LEA and DPW on December 30, 2016. Comments were received from DPW on February 2, 2017; responses to these comments were submitted to DPW on February 20, 2017.

By letter dated May 1, 2017, the City of Los Angeles Department of Transportation stated they are in agreement with the conclusions presented in the Traffic Mitigation Program report and that the shift in operation will not result in any increased significant impacts during the morning peak hours.

Condition 2: Prohibits the unloading/dumping of transfer trailer loads from all Republic transfer stations and from all third parties, including the City of Los Angeles Bureau of Sanitation, from occurring any earlier than 9:00 AM during weekdays and Saturdays.

Status: Effective December 19, 2016, all Republic Services, City of Los Angeles and other third-party transfer trailers were prohibited from coming to the landfill before 9:00 AM weekdays and Saturdays. This condition has been adhered to since December 19, 2016.

Condition 2.a: Requires Republic Services to provide funding for an independent third party odor monitor at and near Van Gogh Charter School during the hours of 6:00 AM to 9:00 AM. This third party monitor will report directly to the District.

Status: SCAQMD made the decision to solicit a contractor directly to provide the services for this condition. As of the date of this report, a contractor has not been hired and the independent third party monitoring at and near Van Gogh Charter School has not started. It is expected the independent third party monitoring will be in place at the start of the new school year.

Condition 3: Requires the implementation of the Food Waste Diversion Program proposed by Republic Services for the purposes of increasing the diversion of Food Waste and organic materials from disposal at Sunshine Canyon Landfill. In addition, the Food Recovery Program proposed by Republic Services will be implemented.

Status: A status report for the Food Waste and Organics Diversion Program for the first quarter of 2017 was submitted on April 28, 2017. Key components reported include:

- (1) Food Recovery – Food Finders
 - In Q1 Republic Services funded \$200,000 toward the purchase of a refrigerated truck for recovery pickup and deliveries, and \$30,000 in marketing funds and ongoing strategic support for Food Finders;
 - Republic's customer database was reviewed to identify potential food recovery candidates to partner with Food Finders;
 - In Q1, approximately 25 tons or 41,454 meals were generated by the Republic Services and Food Finders partnership.

- (2) Transfer Station Transload
 - Customers using Innovative Transfer Station identified for efforts to meet the 40 ton per week diversion target for organic waste;
 - During Q1, 406 tons of organic waste was diverted from Sunshine Canyon Landfill.

- (3) Agromin OC Chino Organics Recycling
 - A Covered Aerated Static Pile (CASP) system designed to compost up to 75 tons per days of foodwaste will be constructed;
 - The permit to operate the CASP has been submitted to AQMD and is currently under review;
 - Agromin OC is working with the manufacturer of the CASP system to ensure the Abatement Order milestones are met.

- (4) American Waste Transfer Station Organics Pre-Processing
- An organics pre-processing system will be installed capable of pre-processing up to 250 tons per day of foodwaste;
 - Design for the enclosure of the American Waste Transfer Station in accordance with Rule 4.10 has commenced;
 - Design of an appropriate pre-processing technology to produce a usable product has commenced.

Condition 4: Requires the continued use of the Alternative Daily Cover (ADC) in lieu of using nine inches of daily compacted soil cover.

Status: Approval to continue the pilot study to October 12, 2017 was obtained from the LEA by letter dated November 2, 2016 (Attachment F). The Los Angeles County Department of Public Works (DPW) initially approved the continuation of the pilot study to March 27, 2017 (Attachment F). By letter dated April 28, 2017, Republic Services requested DPW to extend their approval to October 12, 2017 based on evidence that strongly indicates the continued use of the ADC will ultimately result in the overall benefit of increased efficiencies to the site's gas collection and control system as well as the leachate collection system that will also contribute to the reduction of the potential for off-site odors (Attachment F). By letter dated May 11, 2017, DPW approved the continuation of the pilot study to October 12, 2017 to match the LEA's approval date (Attachment F).

Condition 5: Requires the implementation of the intermediate cover enhancement pilot program as directed by the SCL LEA.

Status: Approval for the implementation of the intermediate cover enhancement pilot program (ICE) was received from the LEA on May 16, 2016. Approval from DPW was received on December 20, 2016. These approval letters are included in Attachment G.

Completion of the ICE project was delayed due to the wet weather from mid-December 2016 through early March 2017. The application of Posi-Shell in accordance with the ICE program procedures was completed on March 2, 2017. The ICE project areas are currently being inspected and monitored in accordance with the approved procedures.

Condition 6: Requires conducting the intermediate cover program in a manner “to be harmonized and consistent” with all local land use requirements including the requirements of Condition 44A of the County’s CUP, the IMP and the City of Los Angeles “Q” conditions.

Status: DPW’s approval includes a condition that as part of the ICE project, the impact to the growth of vegetation must be studied and evaluated. This evaluation will be conducted throughout the ICE project period.

Condition 7: Requires the submittal of monthly Rule 1150.1 surface emission monitoring results for the grids that are included in the intermediate cover enhancement pilot program.

Status: Monthly Rule 1150.1 surface emission monitoring results have been submitted to SCAQMD for the grids included in the ICE project. This reporting will continue for the duration of the ICE project.

Condition 8: Requires the placement of additional soil cover on a minimum of at least twenty (20) intermediate cover areas (grids) that have exceeded 25 ppm (methane) for integrated surface emission monitoring at least once during the last three (3) quarters.

Status: This work was completed in early March 2017. Completion of the placement of additional soil on the 20 intermediate cover areas (grids) was delayed due to the heavy rains experienced in the Los Angeles area from mid-December 2016 through early March 2017.

Condition 9: Requires a proposal to be submitted for additional methods/procedures for upgrading and improving the additional areas of the landfill that have intermediate cover.

Status: A report entitled “Evaluation of Potential Enhanced Intermediate Cover Alternatives” was submitted to SCAQMD on March 15, 2017. Recommendations provided include enhancements to 115 acres of intermediate cover area at the site including:

- Application of Posi-Shell - 37.3 acres
- Installation of Closure Turf - 20.7 acres
- Vegetative Cover Preparation and Seeding – 57 acres

At the March 29, 2017 Abatement Order Status Hearing, an expedited schedule for the enhancement of the intermediate cover at the landfill was presented and incorporated into the Abatement Order. The schedule provided to the Hearing Board is provided in Attachment H.

Condition 10: Requires expanding the application of the intermediate cover upgrades to additional surface emission monitoring grids if data or other performance metrics demonstrate cover performance improvements.

Status: The status of each of the recommended enhancements to intermediate cover areas as of the date of this report is as follows:

ACTION	Target Completion	Current Progress
Install 21 acres of Closure Turf, an impermeable synthetic liner overlain by artificial turf	August 31, 2017	On Schedule: The installation area has been prepared and material installation started on May 26th
Apply 37 acres of a thick, flexible spray-on cover that serves as a temporary cover in new waste fill areas	August 31, 2017	On Schedule: 15 acres of spray-on cover have been applied
Establish vegetative cover over 57 acres to prevent erosion and soil thinning and to act as a natural bio-filter	December 31, 2017	On Schedule: Multiple test plots underway

Condition 11: Requires dewatering of wells impacted by liquids, submittal of monthly reports, submittal of a methodology and monitoring procedure to determine the level of dewatering within each impacted well.

Status: Dewatering of gas wells impacted by liquids has been on-going and monthly reports have been submitted to SCAQMD since January 2017. The methodology and monitoring procedure to determine the level of dewatering within each impacted well has been submitted to SCAQMD.

Condition 12: Requires camera integrity testing of all vertical gas wells to evaluate the performance of each gas well.

Status: Integrity testing of all vertical gas wells using a downhole camera began in early December 2016 and was completed in early March 2017. Based on the results of this testing, a program to install new and replacement gas wells was implemented. As of the date of this report, 153 gas wells have been installed or replaced.

Condition 13: Requires maintaining records related to compliance with Condition 12.

Status: Records related to the well integrity testing have been maintained on-site.

Condition 14: Requires submittal of a proposal for additional best management practices to supplement existing best management practices intended to control and treat fresh trash odors. The proposal is to be submitted to the District within sixty (60) days of the issuance of the Order.

Status: This proposal was submitted to SCAQMD on February 13, 2017. By letter dated May 3, 2017 SCAQMD approved the proposal and proposal was approved as final and directed Republic Services to implement the recommended actions (Attachment I).

Condition 15: Requires submittal of an updated Odorous Load Management Plan within thirty (30) days of the receipt of the SCL-LEA's finding and recommendations of programs for best management practices for odor mitigation at transfer stations.

Status: The LEA's findings and recommendations for best management practices for odor mitigation at transfer stations was received on February 15, 2017. In accordance with Condition 15, a revised Odorous Load Management Plan was submitted to SCAQMD on March 16, 2017. By letter dated May 3, 2017, SCAQMD approved the revised plan as final and directed Republic Services to implement the recommended actions (Attachment J).

Condition 16: Requires an assessment of the feasibility of installing physical barriers and or dust/odor containment structures within ninety (90) days of the issuance of the Order.

Status: The Assessment of Physical Barriers and Dust-Odor Containment Structures report was submitted to SCAQMD on March 15, 2017. By letter dated May 3, 2017, SCAQMD issued an interim approval to "facilitate further discussion with the SCAQMD and SCL LEA regarding integration of such additional measures to achieve maximum effect." The additional measures refer to other mitigation measures that would be implemented as "an integral part of the design for proposed physical barriers." SCAQMD further directed Republic Services to implement the proposed plan while further review is being conducted (Attachment K).

8.3 Los Angeles County Department of Regional Planning NOV issued October 25, 2016

On October 25, 2016, the Los Angeles County Department of Regional Planning (DRP) issued a violation to Browning Ferris Industries of California (BFIC) for alleged non-compliance with required requests by DPW under Condition 45N of Conditional Use Permit (CUP) 00-194 (Code Case RPZPE2016002500) (Attachment L). This violation was issued based on a referral from DPW based on DPW's assessment of multiple submittals from Republic Services that DPW deemed "non-responsive".

By letter dated November 1, 2016, Republic Services responded to the NOV and detailed the responses provided to DPW and reiterated Republic's commitment to work with DPW to resolve the discrepancies. At a meeting held on November 28, 2016 with DPW and Republic personnel as well as Republic consultants, each item requested by DPW was discussed as well as the status of each submittal.

An appeal to the NOV issued by Regional Planning was submitted on January 25, 2017 maintaining BFIC had complied with the information requests from the Department of Public Works. An appeal hearing was held on March 7, 2017 which was continued until May 2, 2017 because Regional Planning had failed to provide documents related to the Public Records request submitted by BFIC on February 2, 2017. At the May 2nd appeal hearing, the Hearing Officer sustained the issuance of the NOV, but noted that BFIC had provided a substantial amount of information, and several of DPW's information requests were "unclear". The Hearing Officer left it to the discretion of the Director of Regional Planning whether to issue a civil penalty.

By letter dated May 4, 2017, Regional Planning notified BFIC that a penalty in the amount of \$174,000 had been assessed (Attachment L). This payment was made to Regional Planning on May 11, 2017 under protest and with the expectation that a further appeal would be made (Attachment L).

8.4 Los Angeles County Department of Public Health Order to Abate dated November 9, 2016

On November 9, 2016, the Los Angeles County Department of Public Health issued an Order to Abate pursuant to Condition 45N of CUP No. 00-194-(5) and required the submittal of a corrective action plan with a compliance schedule and interim milestones for implementing mitigation measures related to the abatement of alleged odors. Public Health required the alleged nuisance to be abated by March 30, 2017 (Attachment M).

On January 13, 2017, BFIC submitted the Corrective Action Plan and Interim Milestones to Public Health. An update to the Corrective Action Plan was sent to Public Health on April 6, 2017. On May 9, 2017, Public Health notified BFIC notifying BFIC that "DPH has determined the landfill is not in compliance with the Order to Abate". A response was sent to DPH on May 17, 2017.

9.0 Revegetation Plans and Recent Hydroseeding Efforts on Temporary Slopes and Stockpiles (City/County)

A quarterly vegetation report is submitted which provides discussions on the vegetation efforts and any hydroseeding activities conducted during the quarter. The vegetation report for the first quarter of 2017 was submitted on May 10, 2017.

10.0 Venturan Coastal Sage Mitigation Plan (City's M.4.4.1 (60) &(61))

As reported in previous TAC reports, a landscape architecture and planning contractor, Architerra Design Group (Architerra), was hired to design and develop a habitat restoration and landscape improvement plan for the City South C Trial Plot. This project is intended to be a pilot or demonstration project to determine the most effective course of action for re-vegetation of the closed deck and slopes area on the City South area of the site. Work on this project began in the first quarter of 2013 with construction/planting activities completed in May of 2013. Weekly activities have been conducted in the pilot project area since that time consisting of maintenance, selective pruning and repairs to the irrigation system when needed.

An assessment of the site's sage mitigation areas, including the pilot project area, is conducted by a qualified biologist on a quarterly basis and is included in the quarterly vegetation reports. The quarterly monitoring consists of an overall assessment of the site's sage mitigation areas (City and County mitigation areas) as well as a sampling and assessment of the pilot project area in accordance with the procedure presented in the First Quarter Vegetation Report entitled "*Methodology for Monitoring Percent Cover and Species Richness within Each Seeded Application Method on the Coastal Sage Scrub Pilot Project at the Sunshine Canyon Landfill*".

Many positive observations have been noted over the course of the pilot project including the following:

- Due to the winter rainfall, many native species are thriving and vegetation rejuvenation has improved;
- Many of the CSS natives are flowering including Coast Sunflower, Black Sage, Purple Sage, White Sage, Creeping Wild Rye, Deerweed and Mexican Elderberry;
- Many new seedlings of CSS species were observed throughout the trial area;
- The installation of new straw wattles has helped minimize erosion and evidence of newly germinated species was noticed around the wattles.
- There is still evidence of small mammals including rodent burrows rabbit scat, and deer tracks, and reptiles including side-blotched lizard, western whiptail, and Western fence lizard. There have been observations of Mule Deer in the trial site area.

10.1 Proposed Phase 2 Coastal Sage Scrub Pilot Mitigation Project

On August 15, 2016, a proposal for a second phase of the Venturan Coastal Sage Scrub (CSS) mitigation was submitted to the TAC. This proposal presented two options to be considered for the Phase 2 CSS mitigation; the option to implement the second phase on Deck B was selected. This includes approximately 9.5 acres with the majority of the area being relatively flat although there are some shallow slopes along the edges. The area contains established CSS which would be protected during the construction of the area.

As of the date of this report, the construction plans for the Phase 2 CSS mitigation area on Deck B are being prepared. Implementation of Phase 2 is scheduled to be conducted in the Fall of 2017.

11.0 Chatsworth Mitigation (City Q.C.9)

The ordinance amending Section 12.04 of the Los Angeles Municipal Code has not been finalized as of the date of this report. Comments on the draft Ordinance were received from the Army Corps of Engineers (ACOE) on April 17, 2015 and forwarded to the City the same day. A conference call was held on July 7, 2016 to discuss the status of the draft Ordinance. Based on that call, Republic Services proceeded with work to develop an Addendum to the Mitigated Negative Declaration (MND) as a supporting document to the Ordinance. As of the date of this report, the following work has been done on the MND:

- Contractors for the three areas of the MND that require updating (per ACOE) were selected:
 - Biological Resources – Mike Zander and Associates (Zander)
 - Cultural Resources – John Minch and Associates (JMA)
 - Air Quality – TetraTech
- Zander and JMA conducted their field surveys on November 17th and 18th;
- On November 29th, JMA recommended a Native American consultation for the project based on the results of the Sacred Lands File check which indicated a change in status of Sacred Lands within the Chatsworth Reservoir Mitigation Project Area (Attachment N);
 - Based on this information, a Native American consultation was conducted. Consultation letters were sent out March 26, 2017 and responses requested by April 28, 2017. Responses received are included in Attachment N;
 - A conference call with Ms. Julie Wagner (LADWP) was held on May 8, 2017 to discuss the responses. Based on the discussion, Ms. Wagner indicated

LADWP, as the lead agency for the project, would be requesting additional archaeological studies of some of the sites in the project area. As of the date of this report, a letter from LADWP has not been received from LADWP requesting the additional studies.

As of the date of this report, the Addendum to the MND has not been finalized as the results of the additional archaeological studies need to be included.

12.0 Status of Alternative Fuels Vehicles (City/County)

SCL continues to fuel the E-85 vehicles with Ethanol 85 approximately once a week at a fueling station located at 12881 Encinitas Avenue, Sylmar. Currently the site owns and operates eleven vehicles that use E-85 fuel.

In 2009, six Tier 3 engines were fitted with additional Diesel Particulate Filters (DPFs) to help reduce emissions. In 2014, one (1) unit was retrofitted with an LPG engine to reduce emissions; one (1) unit was retrofitted with an LPG engine in 2015; one (1) unit currently uses ultra-low sulfur diesel fuel. All other DPFs have been eliminated due to fire hazards or problems associated with the Electronic Control Module (ECM). According to SCL's research, there have been no advancements in technology for alternative fuel for heavy machinery.

13.0 Backup Generator (City/County)

As reported in previous TAC reports, SCL is in compliance with CUP Condition 83. Generators needed to provide power to the landfill gas flaring system have been identified and secured by a contractual arrangement with Quinn Power Systems.

The transfer switches for Flares 1, 3, 9 and 10 have been installed. One generator has been purchased and is currently staged on-site, however, a permit for this generator has not been received. The permit applications were submitted to the SCAQMD on March 25, 2013.

14.0 Soil Importation

On July 28, 2015, Republic Services submitted a request to LA County DPW for approval to import clean soil that will be made available from the Los Angeles County's Devil's Gate Reservoir Sediment Removal and Management Project located in Pasadena, California. By letter dated May 4, 2016, DPW approved the importation of this material to Sunshine Canyon Landfill (Attachment O).

By email dated September 12, 2016, Mr. Ken Zimmer (Senior Civil Engineer, Water Conservation Planning, LA County Department of Public Works) informed Republic Services personnel there would be a delay in the Devil's Gate Reservoir Sediment

Removal Project and stated the LA County Flood Control District would plan on sending a portion or all of the material from the Pacoima Spreading Grounds to Sunshine Canyon Landfill. According to communication from Mr. Zimmer, the Pacoima Spreading Grounds project is scheduled to commence in the Spring of 2018.

15.0 Current and Planned Projects Outside the Disposal Area

Two projects require work to be conducted outside the site's current grading limit:

- SCE Power Pole Relocation Project;
- Future Cell CC-4 Stability Buttress

Grading for a portion of the SCE Power Pole Relocation Project started in March 2016 and was completed in early July 2016. Grading for the CC-4 stability buttress is planned for 2018. As part of the approvals for these projects, a Revised Exhibit "A" ("A-2") is required to be submitted and the revised grading limits approved by the Los Angeles County Department of Public Works (DPW) and the Los Angeles County Department of Regional Planning. The Revised Exhibit A application was submitted to DPW and Regional Planning on November 16 and November 21, 2016, respectively. Comments on the Survey Monument Plan were received from DPW on April 11, 2017. These comments have been addressed and the Revised Exhibit A application ("A-2") has been submitted to DPW and Regional Planning on May 30 and 31, 2017, respectively.

The following sections present summaries of the two projects.

15.1 SCE Power Pole Relocation Project

This project started in March 2016 and was completed in July 2016. Approximately 4,200 feet of the 66kV subtransmission line running through the center of the landfill was removed and relocated around the perimeter of the County portion of the site. The completion of this project ensured that this high voltage subtransmission line will not interfere with landfill operations and also ensures compliance with the subtransmission line clearance requirements found in Commission General Order (GO) 95. The decision granting SCE a permit to construct the project was issued by the California Public Utilities Commission (CPUC) on April 2, 2014.

15.2 Future Cell CC-4 Stability Buttress

CC-4 will be constructed in the southwest portion of the site along the southwestern boundary of Phases I and II-B and west of CC-2 and CC-3A Part 1. An earthen stability buttress is being proposed in order to construct the west slope of the CC-4 liner unit (Future Cell CC-4, Part 3). The rationale for the design of the proposed stability buttress is included in the Design Report for CC-

4 which has been submitted to the LARWQB. By letter dated April 26, 2016, the LARWQCB approved the design report for Cell CC-4, Parts 1-5 (Attachment A).

Comments on the CC-4 stability buttress were received from DPW in letters dated October 19, 2015 and January 13, 2016 and also discussed during meetings held with DPW personnel on December 13, 2015 and March 1, 2016. DPW comments pertain to the proposed analysis that indicated the slope stability factors of safety (FS) for temporary construction slopes could be less than the County's minimum standard of 1.25. Based on these comments, an addendum report was submitted to DPW on April 6, 2016 detailing the mitigation recommendations and supporting analysis to substantiate that the proposed Cell CC-4 development grading will meet or exceed DPW's minimum slope stability FS criteria for temporary slopes (e.g. 1.25). Additional comments were received from DPW on June 15, 2016; an additional geotechnical report was submitted to DPW on July 11, 2016 and responses to comments from DPW's Building and Safety and Water Resources Divisions were submitted on August 11, 2016.

Additional comments were received from DPW on October 25, 2016. Responses to these comments were submitted to DPW on November 17, 2016. More comments were received from DPW on March 9, 2017; responses to these comments and revised drawings were submitted to DPW on April 24, 2017. As of the date of the report, no additional comments have been received from DPW. DPW has informed Republic Services that the approval of the CC-4 grading and drainage plans are contingent upon the approval of the Revised Exhibit A and Survey Monument Plan.

16.0 Current Monitoring Activities

The following monitoring activities have been conducted since January 2017:

- Construction Monitoring - Grading for CC-4 Part 2 Subgrade Excavation:
Scope: Archaeological and paleontological monitoring
Consultant: John Minch and Associates (JMA)
- Third Party Mitigation Monitoring
Scope: Third-party Mitigation Monitoring
Consultant: UltraSystems
- Surface Emission Monitoring
Scope: Monitoring required by SCAQMD Rule 1150.1 (Surface Emission Monitoring, Perimeter Probe Monitoring, etc.)
Consultant: RES Environmental
- Biological Monitoring

Scope: Coastal Sage, Oak Tree and Big Cone Fir Mitigation Monitoring
Consultant: John Minch and Associates (JMA)

- Ambient Air Monitoring

Scope: Third-party Ambient Air Monitoring
Consultant: Sonoma Technology, Inc. (STI)

- Gas Well Monitoring

Scope: NSPS Monitoring
Consultant: TetraTech/Brian A. Stirrat and Associates (TetraTech-BAS)

Please note that off-site odor monitoring conducted in nearby neighborhoods is conducted by Republic Services' employees.

17.0 Response to Third Party Mitigation Monitor Observations

UltraSystems provides the third party mitigation monitoring as required by Q Condition C.12.c. UltraSystems personnel perform monitoring visits in order to observe operational site activities and determine compliance status with conditions and/or mitigation measures. After each site visit, UltraSystems and Republic personnel meet to discuss the findings and observations.

This section provides an update on the status of the block retaining wall on San Fernando Road. The following activities have been conducted related to this item:

- A geotechnical investigation of the slope above the retaining wall has been conducted;
- A structural investigation of the current condition of the block retaining wall has been conducted.

These two investigations were finalized the last week of May 2017; after the results of these investigations have been evaluated, further actions related to the block wall and the slope area behind the wall will be determined.

18.0 Recent Landfill Activities and Planned Activities for Next Six Months

Recent activities conducted at the landfill are discussed in previous sections and include the following:

- Installation of new vertical gas wells and associated piping (153 wells installed year to date);
- Installation of additional dewatering pumps in gas wells impacted by liquids;

- Continued implementation of ADC Pilot Project;
- Implementation of the Intermediate Cover Enhancement (ICE) pilot project;
- Continued maintenance of City South Coastal Sage Mitigation Area;
- Completion of Cell CC-4 Part 1 and liner activities;
- Upgrade to aboveground leachate collection system.

Planned activities for the third and fourth quarters of 2017 include:

- Activities to respond to SCAQMD Abatement Order conditions – please refer to Section 8.1;
- Liner activities for Cell CC-4 Part 2;
- Installation of Flare 11;
- Conclusion of the (ICE) Project;
- Continued implementation of the ADC pilot project;
- Phase 2 Coastal Sage Scrub Pilot Mitigation Project;
- Continued maintenance of City South Coastal Sage Mitigation Project area;

Please do not hesitate to contact me at (818) 362-2072 if you have any questions.

Sincerely,



Rob Sherman
General Manager
Sunshine Canyon Landfill

Cc: Ly Lam, City Planning
Nick Hendricks, City Planning
Maria Masis, LA County Regional Planning
Martins Aiyetiwa, County of Los Angeles, Department of Public Works
David Thompson, SCL-LEA Program Lead
Maurice Pantoja, SCL-LEA

ATTACHMENT A

Los Angeles Regional Water Quality Control Board

April 26, 2016

Ms. Patti Costa, Environmental Manager
Sunshine Canyon Landfill
14747 San Fernando Road
Sylmar, CA 91342

APPROVAL OF PHASE CC-4, PARTS 1 – 5, DESIGN REPORT, SUNSHINE CANYON CITY/COUNTY LANDFILL, SYLMAR, CALIFORNIA (ORDER NO. R4-2008-0088, FILE NO. 58-076)

Dear Ms. Costa:

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board), has received from you a document titled *Design Report, Phase CC-4, Parts 1 – 5, Sunshine Canyon Landfill* (Design Report) that was prepared by Geo-Logic Associates for Republic Services (Discharger), dated September 2015, and submitted to the State Water Resources Control Board GeoTracker System on December 16, 2015. The Report was submitted for the construction of Phase CC-4 liner system at the Sunshine Canyon City/County Landfill (Landfill), which is regulated under waste discharge requirements (WDRs) included in Order No. R4-2008-0088 adopted by this Regional Board on October 2, 2008. The Design Report provides the design and construction information of an approximate 55-acre area within the permitted footprint of the Landfill, including liner and leachate collection systems, subdrain system, grading plans, and slope stability analyses.

Regional Board staff has reviewed the Design Report and found that the proposed liner system design meets the requirements of the WDRs and standards described in California Code of Regulations, title 27, section 20310 et. al. The Design Report is therefore approved. During the proposed landfill construction, if any revision of the Design Report is necessary, the Discharger must submit an amendment to the Design Report, at least 90 days prior to the construction involved the revision, to the Regional Board for the review and approval of Regional Board staff.

In accordance with Requirement D.9 of the WDRs, prior to the start of construction of any containment structure, a geologic map of the final excavation grade shall be prepared for review, approval, and confirmation in the field by Regional Board staff. A final construction quality assurance (CQA) report, including drawings documenting “as-built” conditions, shall be submitted within 60 days after the completion of each part or subpart of liner construction.

A public notice letter regarding this approval was sent to interested parties on March 15, 2016, to meet General Provision No. M.22. of the WDRs, which states: “*During oversight of this Order, wherever the Executive Officer is authorized to grant any approval under a particular provision of this Order, the Executive Officer is directed to assess if there is controversy associated with the decision following public notice and, if so, bring the decision to the Regional Board for approval.*” The deadline for submitting comments regarding this matter was April 14, 2016. During the period, we received an email from Mr. David Nguyen of the County of Los Angeles Department of Public Works (DPW) (copy attached) that provides comments regarding the

Design Report. The email requested that the Regional Board's approval of the Design Report be in conjunction with the approvals and clearances of the DPW on grading and drainage design of the proposed liner construction. In accordance with Requirement M.3. of the WDRs¹, approval of the Design Report by the Regional Board does not release you from the responsibility of complying with any other laws and regulations that may be enforced by the DPW or other regulatory agencies.

If you have any questions or need additional information, please call Dr. Wen Yang, Chief of Landfill Disposal Unit, at (213) 620-2253.

Sincerely,



Samuel Unger, P.E.
Executive Officer

Enclosure

Cc: Leslie Graves, Division of Water Quality, State Water Resources Control Board
Michael Wochnick, California Department of Resources Recycling and Recovery,
Sacramento
Gerardo Villalobos, Los Angeles County, DPH, Baldwin Park
Martin Aiyitiwa, Los Angeles County Department of Public Works, Alhambra
David Thompson, City of Los Angeles, Environmental Affairs Department
Ted Kowalczyk, South Coast Air Quality Management District, Diamond Bar
Richard Slade, Upper Los Angeles River Area Watermaster
Mitchell Englander, Councilmember, 12th District, City of Los Angeles
Wayde Hunter, North Valley Coalition, Granada Hills
Wayne Aller, Knollwood Property Owners Association, Granada Hills
Becky Bendickson, Granada Hills North Neighborhood Council
Kim Thompson, Granada Hill North Neighborhood Council
Wayne Adelstein, North Valley Regional Chamber of Commerce
Ralph Kroy, LA City Sunshine Canyon Landfill Community Advisory Committee

¹ Requirement M.3. of the WDRs states: "These requirements do not exempt the Discharger from compliance with any other current or future law that may be applicable. They do not legalize this waste management facility, and they leave unaffected any further restraints on the disposal of wastes at this waste management facility that may be contained in other statutes."

Yang, Wen@Waterboards

From: Dave Nguyen <DNGUYEN@dpw.lacounty.gov>
Sent: Wednesday, April 13, 2016 6:11 PM
To: Yang, Wen@Waterboards
Cc: Martins Aiyetiwa; Gabriel Esparza; Karlo Manalo; Nam Doan
Subject: Sunshine Canyon City-Cnty Landfill_Public Notice, File No. 58-076_2016-03-15 - Comments from Los Angeles County Department of Public Works
Attachments: Sunshine Cyn City-Cnty Landfill_Public Notice, File No. 58-076_2016-03-15.pdf

Good afternoon Wen,

We appreciated the opportunity to review the Liner Design Report provided as part of the Water Board's Public Notice dated March 15, 2016, for Phase CC-4, Parts 1-5 (attached). Based on our review, we have the following comment:

Since the Sunshine Canyon Landfill Operator, Republic Services, also submitted grading plans and slope stability analysis reports for the construction of Cell CC-4 to the Department of Public Works for review and approval, to ensure the operator also acquire necessary approval of these items from the regulatory agencies, we respectfully request the Water Board to include this clauses (or similar) in the Water Board's approval letter: **"Republic Services is required to obtain necessary approvals and clearances relating to grading and drainage design of Cell CC- 4 that may be required by the Los Angeles County Department of Public Works and other regulatory agencies."**

Please let us know if you have any questions.

Thank you,

David Nguyen
Civil Engineer
County of Los Angeles Department of Public Works
Environmental Programs Division
(626) 458-5189

Los Angeles Regional Water Quality Control Board

March 23, 2017

Ms. Patti Costa, Environmental Manager
Sunshine Canyon Landfill
14747 San Fernando Road
Sylmar, CA 91342

**APPROVAL OF CONSTRUCTION QUALITY ASSURANCE REPORT, CELL CC-4, PART 1,
LINER INSTALLATION - SUNSHINE CANYON LANDFILL, SYLMAR, CALIFORNIA (FILE
NO. 58-076, ORDER NO. R4-2008-0088, WDID NO. 4B190329001)**

Dear Ms. Costa:

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board), has received the *Final Report of Construction Quality Assurance, CC-4 Parts 1, Sunshine Canyon Landfill* (Report), prepared by Geo-Logic Associates for Republic Service (Discharger) and dated March 4, 2017. The Report documents the construction quality assurance (CQA) services performed during the construction of Cell CC-4, Part 1, which consists of approximately 8.8 acres of liner system at the Sunshine Canyon Landfill (Landfill) in Sylmar, California, that is owned and operated by the Discharger. It has been submitted to comply with waste discharge requirements (WDRs) Order No. R4-2008-0088, which was adopted by the Regional Board for the Landfill on October 2, 2008, and applicable requirements in title 27 of the California Code of Regulations (27 CCR).

Regional Board staff has completed review of the Report and, based on the information provided and our observations during site inspections at the Landfill conducted on November 8, 2016, December 13, 2016, January 31, 2017, and March 14, 2017, have determined that this portion of the landfill liner system meets the requirements in Section D of the WDRs (Requirements for Containment Structures) and Section 20310 et. seq. of 27 CCR (Waste Management Construction Standards). Discharge of municipal solid wastes, as defined in the Section A of the WDRs (Acceptable Materials), in this area of the Landfill is hereby approved.

If you have any questions, please contact me at (213) 620-2253.

Sincerely,

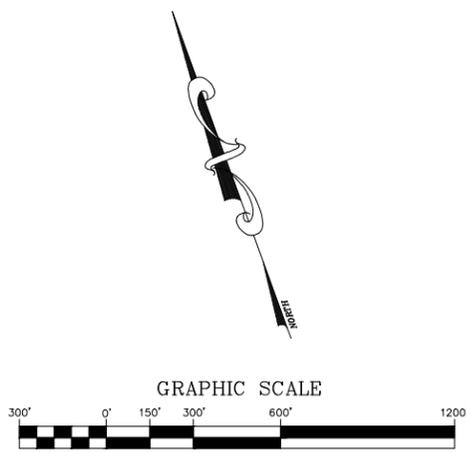
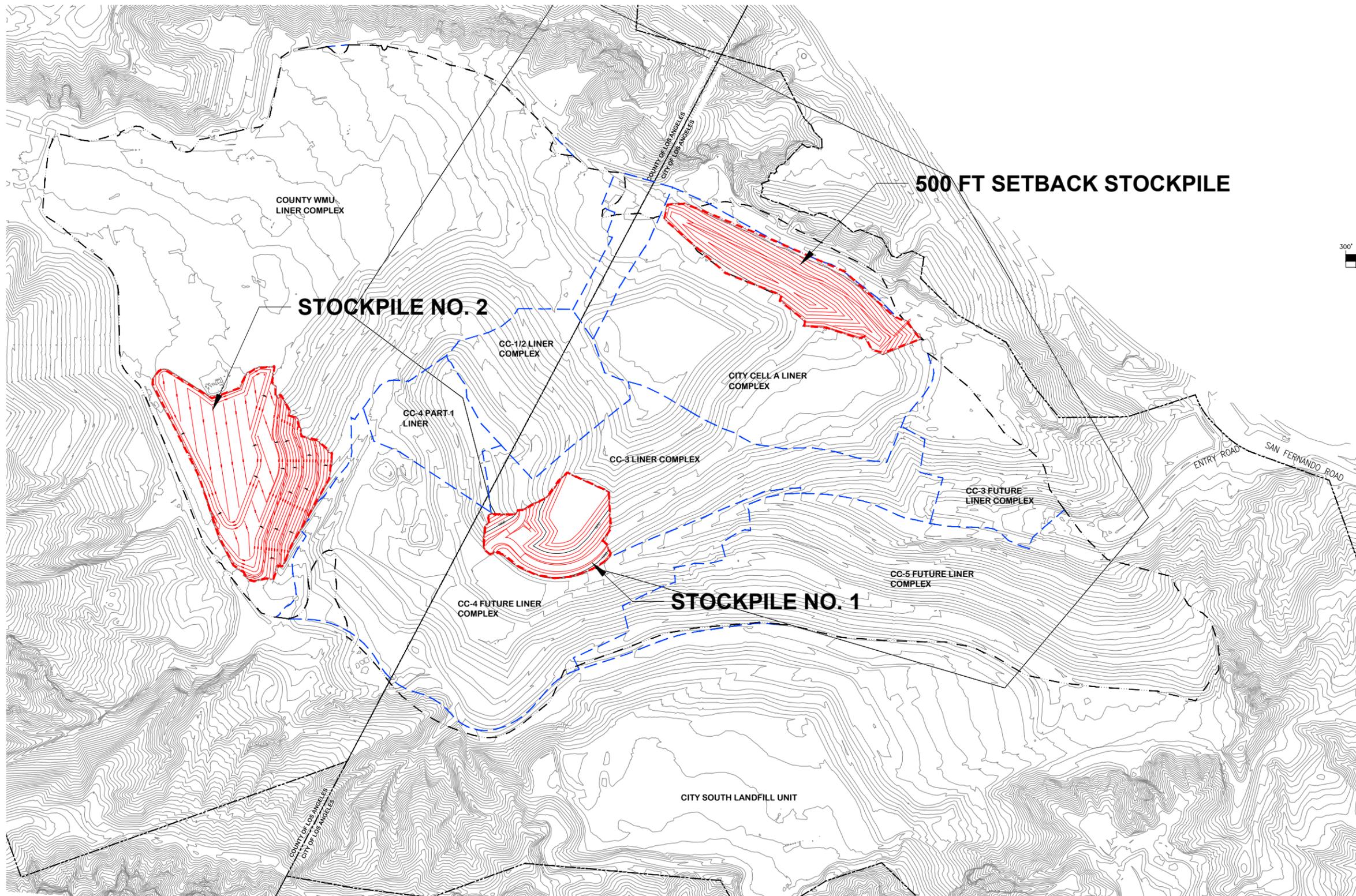


Wen Yang, Ph.D., C.H.G.
Senior Engineering Geologist
Chief of Land Disposal Unit

cc:

Michael Wochnick, CalRecycle (Michael.Wochnick@CalRecycle.ca.gov)
Maurice Pantoja, Sunshine Canyon Landfill LEA (mpantoja@ph.lacounty.gov)
David Thompson, Sunshine Canyon Landfill LEA (david.thompson@lacity.org)
Martin Aiyitiwa, Los Angeles County Department of Public Works
(MAIYET@dpw.lacounty.gov)
Mohsen Nazemi, South Coast Air Quality Management District (MNazemi1@aqmd.gov)
Wayde Hunter, North Valley Coalition, Granada Hills (WHunter01@aol.com)

ATTACHMENT B



NOTE:
BACKGROUND TOPOGRAPHIC MAPPING BY
COOPER AERIAL SURVEYS DATED FEBRUARY
24, 2016 UPDATED WITH MONTHLY GROUND
SURVEYS THROUGH DECEMBER 2016

LEGEND

- WASTE MANAGEMENT UNIT BOUNDARY
- PERMITTED LIMITS OF REFUSE PER 2006 JTD
- LIMITS OF STOCKPILE

This drawing has not been published but rather has been prepared by Geo-Logic Associates, Inc. for use by the client named in the title block, solely in respect of the construction operation, and maintenance of the facility named in the title block. Geo-Logic Associates, Inc. shall not be liable for the use of this drawing on any other facility or for any other purpose.

DRAWING STATUS
ORIGINAL DRAWING SIZE IS 22" X 34"

REV. NO.	DATE	DESCRIPTION	APPROVED BY
REV1	00	00	00
REV2	DATE2	DESCRIPTION2	DRAWN2
REV3	DATE3	DESCRIPTION3	DRAWN3
REV4	DATE4	DESCRIPTION4	DRAWN4
REV5	DATE5	DESCRIPTION5	DRAWN5
REV6	DATE6	DESCRIPTION6	DRAWN6

DATE OF ISSUE: DEC_2016
DESIGNED BY: R_JOHNSON
DRAWN BY: C_BARRETT
CHECKED BY: R_JOHNSON
APPROVED BY: R_JOHNSON



250 W. FIRST STREET
SUITE 228
CLAREMONT, CA 91711
(909) 626-2282
www.geo-logic.com



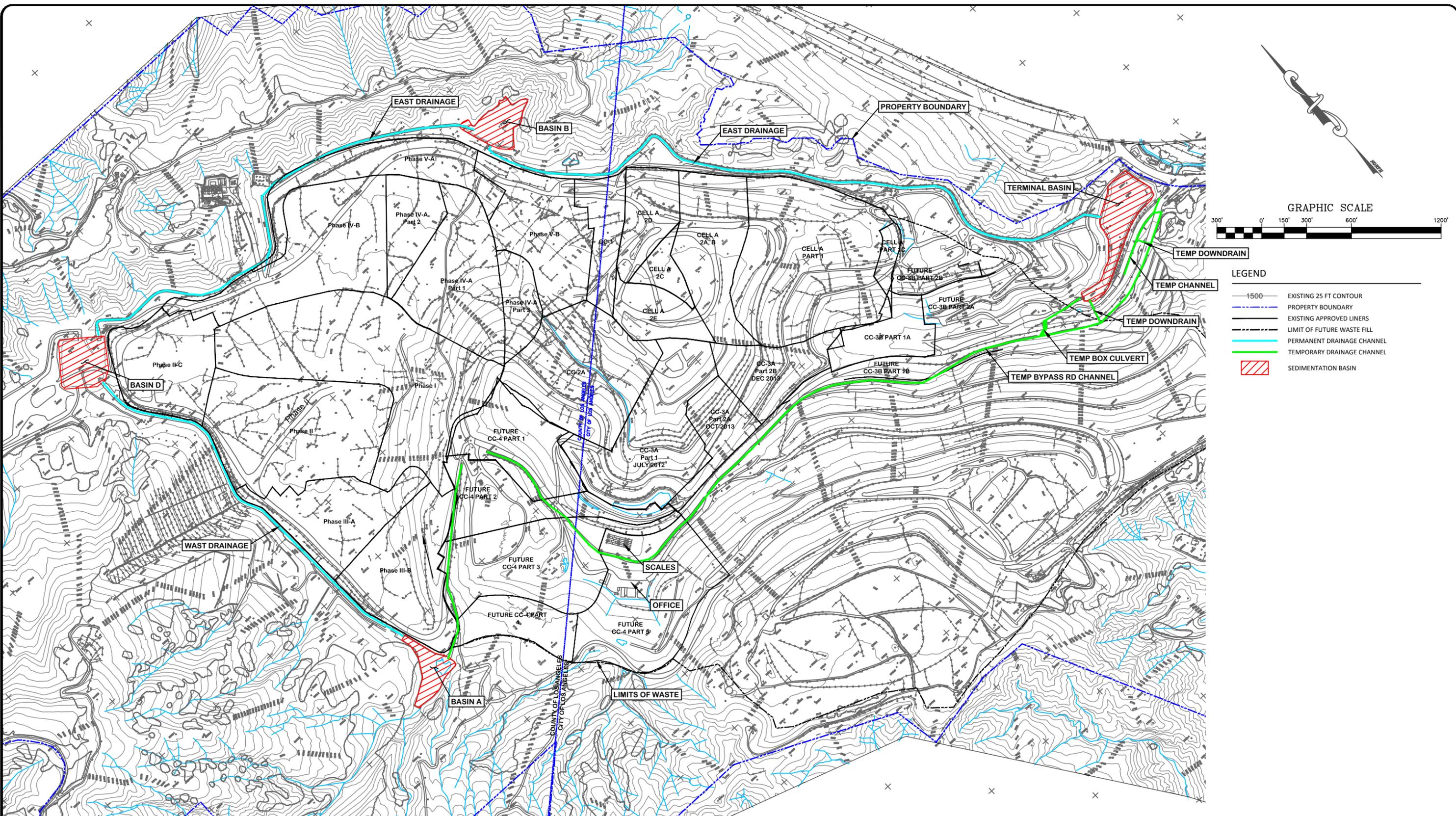
SUNSHINE CANYON LANDFILL
SYLMAR, CALIFORNIA
OPERATIONS PLANS
STOCKPILE LOCATIONS IN 2016

DWG NO.
1
PROJECT NO.
2016.0023

C:\Users\jgo-user\Documents\Republic Services\Sunshine Canyon Maps and Exhibits\SCL - Stockpile Locations for 2016 123016.dwg Dec 30, 2016 - 8:12am By: jgo-user

ATTACHMENT C

C:\Users\glo-user\Documents\Allied-Republic\Sunshine Canyon LF\Exhibits\SCL Drainage Structures Map 2015.dwg May 13, 2016 3:59pm By glo-user



FOR REVIEW ONLY

REV. NO.	DATE	DESCRIPTION	APPROVED BY
R001	000001	D000R00000	DR0001
R000	000000	D000R00000	DR0000
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ATTACHMENT D



COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

GAIL FARBER, Director

900 SOUTH FREMONT AVENUE
ALHAMBRA, CALIFORNIA 91803-1331
Telephone: (626) 458-5100
<http://dpw.lacounty.gov>

ADDRESS ALL CORRESPONDENCE TO:
P.O. BOX 1460
ALHAMBRA, CALIFORNIA 91802-1460

June 15, 2016

IN REPLY PLEASE
REFER TO FILE: **EP-5**

Mr. Rob Sherman, General Manager
Sunshine Canyon Landfill
Republic Services, Inc.
14747 San Fernando Road
Sylmar, CA 91342-1021

**SUNSHINE CANYON CITY/COUNTY LANDFILL
CONDITIONAL USE PERMIT NO. 00-194-(5)
COMMENTS ON THE REVISED WEST DRAINAGE CHANNEL MASTER PLAN**

Dear Mr. Sherman:

We have reviewed the following documents submitted by Republic Services, Inc. (Republic) to the Los Angeles County Department of Public Works (Public Works) for the revised West Drainage Channel Master Plan Project:

- Private Drain No. XXXX – Sunshine Canyon Landfill West Drainage, submitted by Republic to Public Works on December 10, 2015; and
- Surface Water Drainage Analysis – West Drainage Master Plan, submitted by Republic to the Los Angeles Regional Water Quality Control Board on January 9, 2015.

Based on our review, the following are our comments:

General Design

Please see enclosed plans containing comments on the Revised WDC Master Plan.

Geotechnical and Materials

The Surface Water Drainage Analysis for the Landfill's WDC Master Plan appears to conceptually meet the proposed development needs. However, in order for the design to be accepted as permanent, it will be necessary to meet all minimum County standards and those standards set forth in the California Code of Regulations, Title 27, Section 21750; Conditional Use Permit No. 00-194-(5) Condition No. 38; and applicable portions of the 2014 County of Los Angeles Building Code.

The following comments must be addressed prior to recommendation of the proposed West Drainage Private Drain for approval by Public Works.

Mr. Rob Sherman, General Manager
June 15, 2016
Page 2

1. Provide a geotechnical map that complies with the provisions of the County of Los Angeles Department of Public Works *Manual for Preparation of Geotechnical Reports*. The geotechnical map shall be based on the proposed improvement plans.

As outlined in the Department of Public Works Manual for Preparation of Geotechnical Reports, the geotechnical map must show the following:

- a. The aerial distribution of geologic materials with sufficient lateral extent beyond the property limits to determine the potential adverse effects on existing landfill operations and off-site properties, as appropriate, with sufficient geologic symbols to depict clearly site geology.
 - b. Existing landfill cell limits; landslides and their limits; all geotechnical cross-sections, including those utilized for slope stability analyses; springs and seeps (discharge rate should be noted); subdrains; limits of shear keys, keyway excavations, and buttress fills; geotechnical hazard setback lines/planes; exploratory excavations and borings locations, including those not removed by grading; and any areas of over-excavation and replacement.
2. All relevant subsurface data and associated logs (soil borings, groundwater wells, borings with inclinometers, gas monitoring wells, etc.) referenced on the geotechnical map must be provided in the report.
 3. Natural and manmade slopes with slope gradients steeper than 2:1 (horizontal:vertical) (h:v) or where geologic structure may adversely affect slopes with shallower slope gradients shall be analyzed for slope stability with respect to the proposed improvements.
 4. Geotechnical cross-sections shall include all relevant subsurface explorations; illustrate geologic contacts; indicate true and apparent dips of bedding and other discontinuities, such as joints, fractures, faults, etc.; potentiometric surface; seeps; and all other relevant geologic details.
 5. Appropriate bedding plane and joint/fracture shear strengths representative of site-specific geologic materials shall be represented in the stability analyses, as appropriate. Provide supporting data for all material strengths utilized in slope stability analyses.

Note: Shear strength values provided in Table No. 20 of the JTD may be used only in seismic slope stability analyses. They are not appropriate for use in static slope stability analyses.

6. Provide static, seismic, and surficial slope stability analyses for all conditions that may impact or alter (i.e. horizontal and/or vertical displacement) the drainage paths of the channel alignment.
7. For each stability analysis presented, a corresponding detailed geotechnical cross-section shall be provided that shows the distribution of geologic materials. The critical failure plane and the various shear strength parameters used in the appropriate segments of each failure plane shall be shown on the analyses. If factors of safety are below County minimum standards then mitigation measures shall be presented.
8. Stability analyses shall investigate the various slope stabilities that may be affected by the proposed development. Methods of analyses (i.e. circular, translational or block, non-circular, etc.), the limit equilibrium methods (i.e. Ordinary Method of Slices, Modified Bishop Method, Morgenstern-Price based General Limit Equilibrium, etc.), and their related analyzed slip surfaces shall be comprehensive and determine the critical failure plane and factor of safety.
9. The Surface Water Drainage Analysis for Sunshine Canyon Landfill West Drainage Channel Master Plan document acknowledged a potential for settlement to occur over those portions of the proposed private drain alignment that traverse existing waste areas.
 - a. Provide specific numerical values for the potential total static and seismically induced settlements. All settlement values shall be supported by appropriate data and analyses. Provide mitigation recommendations for all areas where values exceed County settlement policies.
 - b. Provide specific distances over which the differential settlement may occur. Refer to the aforementioned Department of Public Works Manual for Preparation of Geotechnical Reports for County standards.
 - c. Recommended mitigation measures shall be made part of the plans.

Note: All mitigation measures on the plans shall be constructed.

10. Address the flow gradient for the proposed West Drainage Private Drain that may experience settlement (even tolerable differential settlement). Provide specific recommendations for preventing areas to create ponding within the private drain. Any section that exceeds permitted flow levels within the channel shall include protective slope improvements to prevent concentrated slope erosion and potentially exposure of buried waste. Provide recommended mitigation measures and details on the plans as necessary.
11. Provide chemical test results (sulfate, chloride, resistivity, etc.) for the on-site soils to address the presence of chemicals deleterious to construction materials and utility lines. The chemical tests must be in accordance with California Test Methods, Department of Transportation, or equivalent. Aqueous solution tests, such as EPA Tests or similar methods, are not acceptable for determination of resistivity. Resistivity tests must be performed on soils in a saturated condition. Recommend mitigation as necessary.
12. In accordance with Section 111 of the County of Los Angeles Building Code, the geotechnical consultant(s) shall make a finding regarding the safety of the site of the proposed work against hazard from landslide, settlement, or slippage and a finding regarding the effect that the proposed building or grading construction will have on the geotechnical stability of the area outside of the proposed work. The finding must be substantiated by appropriate data and analyses and be included in the geotechnical report.
13. Include details for fill placed over existing terrain steeper than 5:1 gradient and a keying and benching detail with all dimensions as determined by a Soils Engineer in the Design Report and plans.
14. Submit plans for verification of compliance with County codes and policies. Plans (scaled at 1-inch \leq 40-feet) shall include, at a minimum, the following, where applicable:
 - a. Existing and proposed grades;
 - b. Slope gradients;
 - c. Subdrain systems;
 - d. Removal and recompaction depths and limits;
 - e. Location of existing and proposed channels and related drainage features;
 - f. Grading sequences (e.g. ABC slot-cutting or removal of landslide driving force before removing supporting toe, etc.); and

- g. All standard general geotechnical notes and fill notes regarding fill compaction and density testing requirements.

Additional drainage and grading requirements of the Department of Public Works can be accessed at <http://dpw.lacounty.gov/bsd/publications>, typical grading requirements are provided on the Grading Review Sheet (see [http://dpw.lacounty.gov/bsd/lib/fp/Drainage and Grading/Plan Check Documents/Grading Review Sheet \(12-23-15\).pdf](http://dpw.lacounty.gov/bsd/lib/fp/Drainage%20and%20Grading/Plan%20Check%20Documents/Grading%20Review%20Sheet%20(12-23-15).pdf)). All applicable grading and drainage requirements shall be incorporated into the plans.

15. All geotechnical reports submitted for review must include an electronic copy of the report on a Compact Disk in Adobe® Portable Document Format (PDF). The electronic version shall include an electronically generated representation of the licensee's seal, signature, and date of signing.

Review Exclusions

The following list of items are beyond the scope of this geotechnical review and are assumed to be addressed by other agencies, such as the Regional Water Quality Control Board, except for when those design items potentially affected slope stability analyses of interim and final slope gradients that may have potential health and safety issues or adverse effects to off-site properties:

- Surficial stability of final cover slopes shallower than 2:1 (h:v);
- Potential deformation of final cover under static and seismic loading;
- Design and evaluation of base liner section, alternate liner section, and slope liner section;
- Protective layer (operation layer);
- Landfill gas collection system;
- Leachate collection and removal system.

Water Resources

The following comments on the Private Drain No. XXXX – Sunshine Canyon Landfill West Drainage Plans:

1. **DWG No. 02.** Within the Hydraulic Element table, double-check whether Line C should be from Sta 71+00 to 76+47.46, instead of from 71+00 to 75+47.46.
2. **DWG No. 03.** The interim flow of 700 cubic feet per second (cfs) does not appear in the hydrology of the West Drainage Channel. Please discuss the interim flow of 700 cfs, its source, timing, and impact to the receiving drain

Mr. Rob Sherman, General Manager
June 15, 2016
Page 6

"Line A." Without further context, it appears the incoming flows to Line A consist of 700 cfs from Line E and 1,245 cfs from Line B while the capacity of Line A is 1266 cfs.

3. **DWG No. 06.** Pertaining to the upper chart, the capacity of 724 cfs should be depicted downstream from Sta 37+00.
4. **DWG No. 06.** Pertaining to the upper chart, double check whether the capacity should be shown as $Q = 764$ cfs, instead of $Q = 760$ cfs.
5. **DWG No. 10.** Pertaining to Line F, the pipe should be able to pass the burned flow rate of 86 cfs instead of 81 cfs. Pertaining to Line E: the pipe should be able to pass the burned flow rate of 60 cfs instead of 56 cfs.
6. **DWG No. 11.** Pertaining to Debris Basin No. 2, there appears to be duplicate labeling of the concrete channel.

Final review of this Project is contingent upon the approval of Cell CC-4 Development Project and/or any future projects or grading that may alter the design and analysis of the WDC Master Plan.

If you have any questions, please contact Mr. Martins Aiyetiwa at (626) 458-3553, Monday to Thursday, 7 a.m. to 5:30 p.m.

Very truly yours,

GAIL FARBER
Director of Public Works



MARTIN AIYETIWA
Senior Civil Engineer
Environmental Programs Division

KM:jl
P:\Sec\PW Comments to SCL West Drainage.doc

Enc.

Los Angeles Regional Water Quality Control Board

October 24, 2016

Ms. Patti Costa, Environmental Manager
Sunshine Canyon Landfill
14747 San Fernando Road
Sylmar, CA 91342

APPROVAL OF REVISED WEST DRAINAGE CHANNEL MASTER PLAN - SUNSHINE CANYON LANDFILL, SYLMAR, CALIFORNIA (FILE NO. 58-076, ORDER NO. R4-2008-0088, GEOTRACKER GLOBAL ID NO. L10006014618)

Dear Ms. Costa:

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board), is in receipt of your letter dated April 27, 2016, transmitting a revised *Surface Water Drainage Analysis, West Drainage Channel Master Plan, Sunshine Canyon Landfill* (Revised Plan), dated January 7, 2015, that was submitted to the State Water Resources Control Board Geotracker data system on April 27, 2016. The Revised Plan provides updated analysis and design details for the construction of the West Drainage Channel at the Sunshine Canyon City/County Landfill (Landfill), which is owned and operated by Republic Services (Discharger) and regulated under waste discharge requirements (WDRs) included in Order No. R4-2008-0088 adopted by this Regional Board on October 2, 2008.

The initial plan was submitted to the Regional Board on March 28, 2014. In a letter dated July 1, 2014 (copy attached), Regional Board staff provided comments that, among others, expressed concerns about potential damages that may be caused by differential settlements of the closed City Landfill No. 1, over which part of the drainage channel will be constructed. In addition, the letter included comments from the Los Angeles County Department of Public Works (LACDPW) on the technical aspects of the plan.

Regional Board staff have reviewed the Revised Plan and has determined that comments included in our July 1, 2014, letter have been adequately addressed. Specifically, the Revised Plan proposes to use Geocell-reinforced concrete with a geogrid reinforcement layer in the foundation of the channel in areas underlain by the closed landfill unit. We concur that such a design is expected to be able to offset the effects of potential differential settlements of the existing waste mass. The Revised Plan is therefore approved. In accordance with Section K (Provisions for Drainage and Erosion Control) of the WDRs, all drainage structures at the Landfill shall be protected and maintained continuously to ensure their effectiveness. The Discharger is responsible to inspect, repair, and replace the drainage channel if damages occur during the active life and post-closure period of the Landfill.

Please note that approval of the Revised Plan by the Regional Board staff is in conjunction with its approval and clearance by other regulatory agencies, including the LADPW. In accordance

with Requirement M.3. of the WDRs¹, approval of the Revised Plan by the Regional Board does not release the Discharger from the responsibility of complying with any other laws and regulations that may be enforced by other regulatory agencies.

A public notice regarding this approval was sent to known interested parties on September 12, 2016, to meet General Provision No. M.22. of the WDRs, which states: "*During oversight of this Order, wherever the Executive Officer is authorized to grant any approval under a particular provision of this Order, the Executive Officer is directed to assess if there is controversy associated with the decision following public notice and, if so, bring the decision to the Regional Board for approval.*" The deadline for submitting comments regarding this matter was October 12, 2016. We received no comments regarding this matter during the period.

If you have any questions, please contact Dr. Wen Yang, Chief of the Land Disposal Unit, at (213) 620-2253 or wyang@waterboards.ca.gov.

Sincerely,


Samuel Unger, P.E.
Executive Officer

Enclosure

Mailing List:

Leslie Graves, State Water Resources Control Board (Leslie.Graves@Waterboards.ca.gov)
Michael Wochnick, CalRecycle (Michael.Wochnick@CalRecycle.ca.gov)
Gerardo Villalobos, Sunshine Canyon Landfill LEA (gvillalobos@ph.lacounty.gov)
David Thompson, Sunshine Canyon Landfill LEA (david.thompson@lacity.org)
Martin Aiyitiwa, Los Angeles County Department of Public Works (MAIYET@dpw.lacounty.gov)
Mohsen Nazemi, South Coast Air Quality Management District (MNazemi1@aqmd.gov)
Richard Slade, Upper Los Angeles River Area Watermaster (ularawatermaster@rcslade.com)
Mitchell Englander, Councilmember, 12th District, City of LA
(councilmember.Englander@lacity.org)
Ly Lam, City of Los Angeles Department of City Planning (ly.t.lam@lacity.org)
Dave Nguyen, Los Angeles County Department of Public Works
(DNGUYEN@dpw.lacounty.gov)
Wayde Hunter, North Valley Coalition, Granada Hills (WHunter01@aol.com)
Wayne Aller, Knollwood Property Owners Association, Granada Hills
(waynealler07@hotmail.com)
Becky Bendickson, Granada Hills North Neighborhood Council (bebend99@gmail.com)
Kim Thompson, Granada Hill North Neighborhood Council (kimthompson@socal.rr.com)

¹ Requirement M.3. of the WDRs states: "*These requirements do not exempt the Discharger from compliance with any other current or future law that may be applicable. They do not legalize this waste management facility, and they leave unaffected any further restraints on the disposal of wastes at this waste management facility that may be contained in other statutes.*"

Patti Costa
Sunshine Canyon Landfill

- 3 -

Wayne Adelstein, North Valley Regional Chamber of Commerce (wayne@nvrcc.com)
Ralph Kroy, LA City Sunshine Canyon Landfill Community Advisory Committee
(REKroy@aol.com)
Robert Sherman, Republic Services (RSherman@republicservices.com)
Patti Costa, Republic Services (PCosta@republicservices.com)

Los Angeles Regional Water Quality Control Board

July 1, 2014

Ms. Patti Costa, Environmental Manager
Sunshine Canyon Landfill
14747 San Fernando Road
Sylmar, CA 91342

COMMENTS ON WEST DRAINAGE CHANNEL MASTER PLAN - SUNSHINE CANYON LANDFILL, SYLMAR, CALIFORNIA (FILE NO. 58-076, ORDER NO. R4-2008-0088, WQID NO. 4B190329001)

Dear Ms. Costa:

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board), has received from you a report titled *Surface Water Drainage Analysis, West Drainage Channel Master Plan, Sunshine Canyon Landfill, Los Angeles County, California* (Plan), dated March 2014, prepared by GeoLogic Associates, and submitted to the Regional Board on March 28, 2014.

The Sunshine Canyon (Landfill) is a Class III municipal solid waste landfill that is owned and operated by Republic Services Company and regulated under wastewater discharge requirements (WDRs) included in Order No. R4-2008-0088 adopted by the Regional Board on October 2, 2008. In a letter dated August 29, 2013, the Regional Board staff approved a design report for the Phase CC-3B liner construction at the Landfill, with the condition that a detailed design plan for the West Drainage Channel, a permanent storm drain that will be constructed concurrently with the proposed Phase CC-3B liner system, be submitted for the approval of Regional Board staff. The Plan was submitted to meet this condition. Meanwhile, the Plan was also submitted to the Los Angeles County Department of Public Works (LACDPW) for its review.

Regional Board staff has reviewed the Plan and consulted with staff of the LACDPW on the technical aspects of the proposed design. The LACDPW provided its comments on the Plan with a letter addressed to you dated June 16, 2014 (copy attached). The Regional Board staff concurs with those comments in the LACDPW letter and has additional comments on the Plan as follows:

1. A significant portion of the proposed drainage channel will be constructed on top of the City Landfill Unit 1, which has been closed since 1971. A major concern is that differential settlement within the waste mass of the closed landfill could cause serious damage to the proposed concrete channel once it is constructed. Although the Plan proposes a cross section for the portion of the drainage channel over the waste mass (Drawing No. C12) that is different from the cross section for the portion of the channel over native soil (Drawing No. C11), it does not include a discussion to demonstrate that such a design will be adequate to prevent significant damages to the channel that may be caused by differential settlement.

2. Attachment C of the Plan includes drawings of maps, cross sections, and detailed layout of the proposed drainage channel. However, there is no discussion in the Plan to illustrate the purpose of each drawing. Many features and symbols in those drawings are not adequately labeled or referenced. This makes the drawing hard to following and in some cases, not legible. For example, Drawing No. C10 presents two cross sections (Section A-A' and Section B-B'), but there is not a map showing where those cross sections are located and no explanation on the purpose of such cross sections is found in the Plan.
3. Section 5 and Attachment H of the Plan discuss an alternative outfall alignment for the proposed West Drainage Channel. Since the alternative layout involves an extension of the proposed channel line and the excavation of wastes that have been disposed of at the closed City Landfill, a revised design plan must be reviewed and approved by the Regional Board and other regulatory agencies with jurisdiction over the landfill, if the drainage channel is constructed following the alternative outfall alignment.
4. Section D.1. of the WDRs requires that "*All containment structures and erosion and drainage control systems at the Landfill shall be designed and constructed under direct supervision of a California-registered civil engineer or certified engineering geologist, and shall be certified by the individual as meeting the prescriptive standards and/or performance goals of 27 CCR.*" Such a certification is not included in the Plan.

Please address the above comments and the comments provided by the LACDPW in its letter dated June 16, 2014, and submit a revised design plan for the project. Construction of the proposed drainage channel shall not be started until a design plan and final construction plans for the project are approved by the Regional Board staff.

If you have any questions, please contact Dr. Wen Yang, Chief of the Land Disposal Unit, at (213) 620-2253 or wyang@waterboards.ca.gov.

Sincerely,


Samuel Unger, P.E.
Executive Officer

Enclosure: Letter from Los Angeles County Department of Public Works, dated June 16, 2014

cc: Emiko Thompson, Los Angeles County Department of Public Works
Gerardo Villalobos, Sunshine Canyon Landfill LEA
David Thompson, Sunshine Canyon Landfill LEA
Eugene Tseng, City of Los Angeles, Environmental Affairs Department
Wayde Hunter, North Valley Coalition, Granada Hills



GAIL FARBER, Director

COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

900 SOUTH FREMONT AVENUE
ALHAMBRA, CALIFORNIA 91803-1331
Telephone: (626) 458-5100
<http://dpw.lacounty.gov>

ADDRESS ALL CORRESPONDENCE TO:
P.O. BOX 1460
ALHAMBRA, CALIFORNIA 91802-1460

June 16, 2014

IN REPLY PLEASE
REFER TO FILE

EP-5

Ms. Patti K. Costa
Environmental Manager
Sunshine Canyon Landfill
14747 San Fernando Road
Sylmar, CA 91342-1021

Dear Ms. Costa:

WEST DRAINAGE CHANNEL MASTER PLAN SURFACE WATER DRAINAGE ANALYSIS REPORT SUNSHINE CANYON CITY/COUNTY LANDFILL

We reviewed your Surface Water Drainage Analysis report for the West Drainage Channel Master Plan dated March 2014 pursuant to Condition No. 38 of the Sunshine Canyon City/County Landfill Conditional Use Permit No. 00-194-(5) and have the following comments:

- The Drainage Map, Figure 1, provided under Attachment D shall include adequate topography, clarity, and resolution to depict watershed delineation. Each subarea shall be clearly labeled, and subarea collection points shall be shown. The Time of Concentration path from the most remote point of the subarea to the outlet of the subarea shall also be clearly identified. Elevations at the top and at the outlet point of each subarea shall be shown. The paths through which surface flows from the subareas are conveyed to the proposed West Drainage Channel shall also be shown. All drawings including any details, as well as any attachments must be clearly legible in order to facilitate proper review.
- The final outlet from the downdrain/impact basin area into the Terminal Basin is not clearly depicted in any of the design plans or drainage plans. This information shall be provided in the resubmittal which shall include details for the connection of the West Drainage Channel to the Terminal Basin. Details should include but not be limited to alignment profile and cross sections.

- Subarea SA1 is greater than 40 acres and should be further divided to meet Public Works' hydrology standards. The optimum size for a subarea in the County approved Modified Rational Method model is 40 acres. However, smaller subareas are acceptable.
- Section 3.0 – "Surface Water Drainage Analysis," references the Santa Clara River Watershed. However, the receiving drainage system for the Sunshine Canyon Landfill's watershed is Bull Creek, a tributary to the Los Angeles River which is part of the Los Angeles River Watershed. Accordingly, all drainage run-off analyses shall utilize parameters including fire factors, debris production rates, and peak bulk factors, attributable to the Los Angeles River Watershed, rather than the Santa Clara River Watershed.
- The assumption made in Section 4.0 – "Control Structure Sizing," regarding the non-additive nature of runoff flows generated by the surrounding tributary areas to the Western Drainage Channel cannot be claimed. Some flows will be additive to the 480 cubic feet per second peak outflow rate from Basin A. In order to identify the peak flow rate conveyed within the channel and the downdrain, hydrographs from Basin A and each subarea tributary to the West Drainage Channel must be routed together along the reaches of the West Drainage Channel to the Terminal Basin. The resulting peak outflow rate into the Terminal Basin shall be reevaluated to determine the cumulative flow routing effects due to various factors such as channel storage and timing.
- The current hydrologic analysis for the West Drainage Channel is not based on the topography at the point of the landfill's built-out condition. At build-out a substantial area, shown as the area highlighted in red on the enclosed Drainage Map, will become tributary to the West Drainage Channel. Also, not included in the hydrologic analysis is the contribution from the immediate area south of the trapezoidal channel shown as the area highlighted in yellow on the enclosed Drainage Map. Both of these areas shall be included in the hydrologic analysis.
- Under Attachment C, some of the "Alignment Profile" drawings did not reference the correct "Details" drawings. Detailed call-outs on drawings should be labeled correctly with appropriate symbols (as shown in Drawing No. G01) to ensure that all "Alignment Profile" and "Details" drawings are referenced appropriately.

Ms. Patti Costa
June 16, 2014
Page 3

Please address these comments and resubmit a revised West Drainage Master Plan for further review. If you have any questions, please contact Ms. Emiko Thompson at (626) 458-3521, Monday to Thursday, 7 a.m. to 5:30 p.m.

Very truly yours,

GAIL FARBER
Director of Public Works

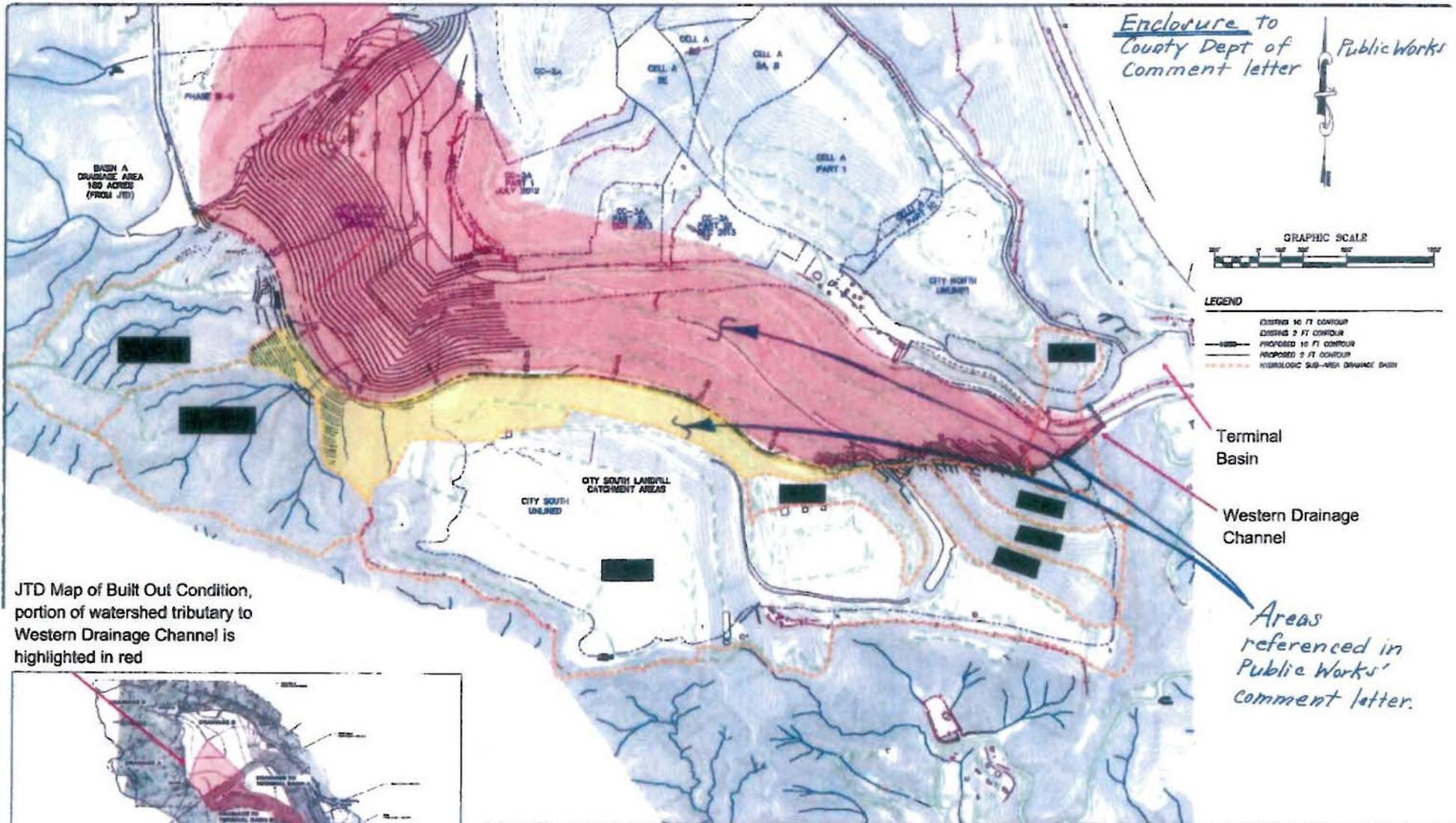


PAT PROANO
Assistant Deputy Director
Environmental Programs Division

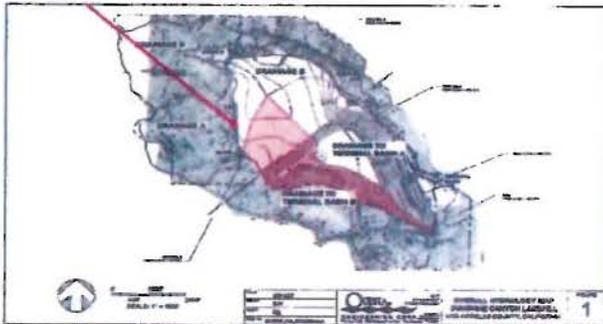
KM:dy
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Enc.

cc: Regional Water Quality Control Board, Los Angeles Region (Wen Yang)
Sunshine Canyon Landfill Local Enforcement Agency (Gerry Villalobos)
Department of Regional Planning (Maria Masis)
City of Los Angeles Department of City Planning (Ly Lam)



JTD Map of Built Out Condition, portion of watershed tributary to Western Drainage Channel is highlighted in red



		SUNSHINE CANYON LANDFILL	FIGURE
		WESTERN DRAINAGE MASTER PLAN	1
		SYLMAR, CALIFORNIA	PROJECT NO.
DRAINAGE MAP		2014-0094	

2. In respect of the contractor's responsibility for the accuracy of the information presented, the City of Sylmar is not responsible.

ISSUED FOR REVIEW

ATTACHMENT E

SUNSHINE CANYON LANDFILL

February 8, 2017

Dr. Wen Yang
Chief, Land Disposal Unit
Los Angeles Regional Water Quality Control Board
320 West 4th Street, Suite 200
Los Angeles, CA 90013

Subject: Sunshine Canyon Landfill, File No. 58-17
Notice of Stormwater Discharge, Order No. R4-2008-0088
January 20, 2017 Rain Event

Dear Dr. Yang,

This letter provides the follow up of the verbal notification and email on January 20, 2017 regarding stormwater discharge to the main haul road at Sunshine Canyon Landfill. This letter provides additional information related to the occurrence as well as the actions that have been taken to ensure this type of occurrence will not occur in the future.

As reported to you, on Friday, January 20, 2017, between the hours of 2 AM to 2:40 PM, 2.6 inches of rain were recorded at the site's rain gauge located on the City South area of the landfill. The most intense rainfall occurred between 11 AM and 1:00 PM (1.7 inches). During this time, the trapezoidal stormwater channel that runs adjacent to the main haul road became inundated with stormwater due to capacity interference related to the gabion cages and accumulated sediment. Although site operations personnel were in the process of removing the gabion cages during this period of time, stormwater overflowed on to the main haul road, bypassing the box culvert which directs stormwater to the terminal basin. This resulted in stormwater discharge out the entrance of the site on to San Fernando Road. Site personnel took immediate actions to direct stormwater to a nearby stormdrain inlet to prevent water from flowing across San Fernando Road and impacting traffic.

The stormwater flow on to San Fernando Road occurred for approximately 30 minutes based on observations conducted by site personnel. An estimation of the volume of stormwater that flowed out the front gate is 13,410 gallons. This estimate is based on the following assumptions:

- 1) Observed peak flow depth at entrance road: 0.25 inches
- 2) Road width/slope: 38 feet/S=0.128 ft/ft
- 3) Observed duration of flow: 30 minutes

Due to the short duration of this flow, samples of the discharge were not collected.

Immediate corrective actions were taken to ensure stormwater is contained within the trapezoidal channel:

- The gabion cages from the Admin channel crossing down to the box culvert have been removed;
- Accumulated sediment was removed during the week of January 30th as weather permitted;
- K-rails are staged at the front of the site which can be moved quickly should they be needed to contain stormwater flow.

Since the January 20, 2017 storm event, there have been several additional storms; the measures stated above proved successful in mitigating the conditions related to this notice.

Please do not hesitate to contact me if you have any questions or require additional information.

Sincerely,



Patti K. Costa, P.E.
Environmental Manager
Sunshine Canyon Landfill

Cc: David Thompson, SCL LEA
Dorcas Hanson-Lugo, SCL LEA
Rob Sherman, Republic Services
Todd Whittle, Republic Services

ATTACHMENT F

SUNSHINE CANYON LANDFILL

April 28, 2017

Mr. Dan Lafferty
Assistant Deputy Director
Los Angeles County Department of Public Works
Environmental Programs Division
(Via Email)

Subject: Request for Extension of Alternative Daily Cover Pilot Project
Sunshine Canyon Landfill, File EP-5

Dear Mr. Lafferty,

By letter dated October 26, 2016, the Los Angeles County Department of Public Works (DPW) approved an extension of the Alternative Daily Cover (ADC) pilot project using geosynthetic panel product (EnviroCover™) to March 27, 2017. The Sunshine Canyon Landfill Local Enforcement Agency (LEA) has approved an extension of the pilot project to October 12, 2017 by letter dated November 2, 2016 (attached). During our meeting yesterday, we provided information that validates the continued use of the ADC and our request for an extension that coincides with the LEA's date of October 12, 2017.

An evaluation report for the ADC pilot project for the period of October 12, 2015 through August 31, 2016 was submitted to DPW and the LEA on September 30, 2016. This report presents the results and findings of the project as related to Title 27 Section 20690 and the performance metrics outlined by the SCL LEA. Based on the information available at the time the evaluation report was written, our recommendation was for the continued use of the ADC as there were positive impacts already being observed and substantiated by available data presented in the evaluation report.

As we discussed at our meeting held on April 27, 2017, we continue to collect data and make observations that strongly indicate the continued use of the ADC will ultimately result in the overall benefit of increased efficiencies to the site's gas collection and control system as well as the leachate collection system that will also contribute to the reduction of potential off-site odors. These data and observations include the following:

- During the installation of vertical gas collection wells recently drilled in the Cell CC-3B portion of the site where only the ADC has been used as daily cover (Monday – Friday), observations of drilling activities have shown the following:
 - A substantial decrease in the amount of liquids present in the waste material;
 - Less odorous waste material being brought up from the boring;
 - Less decomposition of waste material in the drilling spoils (due to less liquid).

- Daily observations of the areas where the ADC is used indicate no odors observed from the underlying waste at the start of operations;
 - These observations are recorded on daily sheets and submitted with the monthly ADC report submitted to DPW and the LEA.
- Daily observations of the areas where the ADC is used show no presence of vectors substantiating the ADC is as effective as soil in controlling vectors.

Based on this information, we respectfully request an extension of the ADC Pilot Project to October 12, 2017.

Sincerely,



Rob Sherman
General Manager
Sunshine Canyon Landfill

Enclosure

Cc: Mr. Bahman Hajialiakbar, LA County DPW
Mr. Martins Aiyetiwa, LA County DPW
Mr. David Thompson, SCL LEA

SUNSHINE CANYON LANDFILL



LOCAL ENFORCEMENT AGENCY

14747 San Fernando Road
Sylmar, California 91324

November 2, 2016

Mr. Rob Sherman
General Manager
Sunshine Canyon Landfill
14747 San Fernando Rd.
Sylmar, CA 91342

SUBJECT: Sunshine Canyon Landfill (SWIS No. 19-AA-2000)
LEA Approval For The Continuation of the Geosynthetic ADC Pilot Project

Dear Mr. Sherman,

On November 5, 2014, the Sunshine Canyon Landfill Local Enforcement Agency (SCL LEA) received a proposal to conduct an alternative daily cover (ADC) pilot project at Sunshine Canyon Landfill (landfill) using a geosynthetic panel product. The proposal was submitted to help control odor generation at the landfill by increasing the efficiency of the landfill gas collection system and leachate control system. On November 26, 2014, the SCL LEA approved the pilot project to operate for a one year period to fully evaluate the ADC for controlling "fresh trash odors" as well as long-term effects on the control of "landfill gas odors". The LEA was notified by Republic Services that the pilot project began on October 12, 2015.

As a condition of approval the ADC pilot project was to be monitored on a daily basis by the landfill operator pursuant to the approved ADC Performance Evaluation Procedures. At the conclusion of the ADC pilot project, the landfill operator was required to submit to the SCL LEA and ADC Evaluation Report.

On October 12, 2016, the one-year pilot project came to a conclusion and Republic Services submitted to the SCL LEA an Evaluation Report on the performance of the geosynthetic panel ADC that was utilized at the landfill. The Evaluation Report found that the geosynthetic panel ADC performed as well or better than the daily soil cover in controlling for vectors, fires, odors, blowing litter, and scavenging without presenting a threat to human health and the environment. However, the effect of the ADC on the landfill gas collection system and the leachate collection system could not be evaluated at this time due to the current filling of Cell CC-3B Part 1A. The impact of the ADC and the trash to trash interface on these systems cannot be fully evaluated until after March 2017 when this cell has been completed and the vertical landfill gas collection wells have been

Gerardo Villalobos, REHS
SCL LEA Program Manager
Office: (626) 430-5550
Email: gvillalobos@ph.lacounty.org
For reply: 5050 Commerce Dr. Baldwin Park, CA 91706

installed. Initial results from the small sampling of collection wells that were installed in the City portion of the landfill were the ADC was utilized over areas with the 9" daily cover showed that no liquids were present in the waste columns.

The SCL LEA conducted an independent evaluation of the ADC pilot project. Our preliminary determination is that the geosynthetic panel ADC is having a positive impact on the landfill operations within the limited sampling that is available. The SCL LEA has determined that during the Project period the ADC met the standards for daily cover pursuant to California Code of Regulations, Title 27 Section 20690.

The SCL LEA would propose extending the ADC pilot project for an additional year so that the ADC's effects on the landfill gas control system and leachate control system in Cell CC-3B Part 1A could be fully evaluated. Therefore, the LEA approves the continued implementation of the Project period for an additional 12 months. Continued implementation will require that all procedures associated with the project shall continue during the evaluation period which will run through October 12, 2017. At the end of this period, the SCL LEA shall evaluate the Project's performance to determine if continued use of the ADC will be approved. The SCL LEA reserves the right to modify/amend the current procedures and suspend or revoke this approval should we determine that the use of the ADC is not meeting the performance standards or fails to protect public health and safety and the environment.

Please do not hesitate to contact me should you need to speak to me.

Sincerely,



Gerry Villalobos, Program Manager
SCL LEA

Cc: David Thompson, SCL LEA
Martins Aiyetiwa, L. A. County Dept. of Public Works



MARK PESTRELLA, Director

COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

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ADDRESS ALL CORRESPONDENCE TO:
P.O. BOX 1460
ALHAMBRA, CALIFORNIA 91802-1460

IN REPLY PLEASE

REFER TO FILE: **EP-5**

May 11, 2017

Mr. Rob Sherman, General Manager
Sunshine Canyon Landfill
Republic Services, Inc.
14747 San Fernando Road
Sylmar, CA 91342-1021

Dear Mr. Sherman:

SUNSHINE CANYON CITY/COUNTY LANDFILL REQUEST FOR EXTENSION OF APPROVAL FOR THE ALTERNATIVE DAILY COVER PILOT PROJECT UTILIZING GEOSYNTHETIC PANEL PRODUCT

On April 28, 2017, Republic Services submitted a request for extension of the Alternative Daily Cover (ADC) Pilot Project, utilizing the geosynthetic panel product (EnviroCover™), at the Sunshine Canyon Landfill to October 12, 2017 (Enclosure 1).

Public Works is hereby granting a second extension for Republic Services to continue implementing the ADC Pilot Project, subject to all conditions as prescribed in Public Works' approval letter of October 27, 2015, (Enclosure 2), for an additional 5 months until October 12, 2017. The first extension was granted on October 26, 2016, for a period of 6 months until March 27, 2017.

Republic Services must submit an updated detailed report to Public Works documenting all observations, monitoring data, results, and recommendations for continued use of the ADC material as an ADC for the Sunshine Canyon Landfill. Such data analysis and evaluation report must also include all documentation establishing whether the project's stated objectives as stated in the October 27, 2015, letter have been met. The report shall be submitted for review at least 30 days prior to October 12, 2017.

Upon the conclusion of the project, Public Works will evaluate the submitted report and will determine 1) if the project objectives have been met as stated in Public Works' October 27, 2015, approval letter; 2) whether to continue, modify, or terminate the 9-inch daily soil cover requirement; and 3) if allowing further use of the ADC material will protect public health and safety within the meaning of Condition 45N of the CUP. If the project objectives are successfully met, Public Works, in concert with the Department of Regional

Mr. Rob Sherman
May 11, 2017
Page 2

Planning and the Department of Public Health, may modify, or terminate the use of 9-inch of daily soil cover requirement and/or allow the continued use of the ADC material on a more permanent basis.

In the event Republic Services is unable to demonstrate that it has met the objectives of the Pilot Project and obtain Public Works' approval for continued use of the ADC material, the ADC Pilot Project shall terminate and the 9-inch of daily soil cover requirement as stated in the attached letter dated September 27, 2010 (Enclosure 3), shall be reinstated and become effective. Thereafter, Public Works may modify the 9-inch daily soil cover requirement upon request by Republic Services.

If you have any questions, please contact Mr. Martins Aiyetiwa at (626) 458-3553, Monday through Thursday, 7 a.m. to 5:30 p.m.

Very truly yours,

MARK PESTRELLA
Director of Public Works



MARTIN AIYETIWA
Senior Civil Engineer
Environmental Programs Division

MH:jl

P:\Sec\Sunshine ADC Pilot Program Extension 4.26.17.docx

cc: Department of Regional Planning (Dennis Slavin, Jon Sanabria, Maria Masis)
Los Angeles County Solid Waste Management Committee/Integrated Waste
Management Task Force
South Coast Air Quality Management District (Laki Tisopulo, Amir Dejaksh)
Sunshine Canyon Landfill – Local Enforcement Agency (Dave Thompson,
Maurice Pantoja)
Sunshine Canyon Landfill – Community Advisory Committee (Becky Bendikson,
Wayde Hunter)
City of Los Angeles Planning Department (Lisa Webber, Ly Lam,
Nicholas Hendricks)
North Valley Coalition of Concerned Citizens (Wayde Hunter)
Granada Hills North Neighborhood Council

SUNSHINE CANYON LANDFILL

April 28, 2017

Mr. Dan Lafferty
Assistant Deputy Director
Los Angeles County Department of Public Works
Environmental Programs Division
(Via Email)

Subject: Request for Extension of Alternative Daily Cover Pilot Project
Sunshine Canyon Landfill, File EP-5

Dear Mr. Lafferty,

By letter dated October 26, 2016, the Los Angeles County Department of Public Works (DPW) approved an extension of the Alternative Daily Cover (ADC) pilot project using geosynthetic panel product (EnviroCover™) to March 27, 2017. The Sunshine Canyon Landfill Local Enforcement Agency (LEA) has approved an extension of the pilot project to October 12, 2017 by letter dated November 2, 2016 (attached). During our meeting yesterday, we provided information that validates the continued use of the ADC and our request for an extension that coincides with the LEA's date of October 12, 2017.

An evaluation report for the ADC pilot project for the period of October 12, 2015 through August 31, 2016 was submitted to DPW and the LEA on September 30, 2016. This report presents the results and findings of the project as related to Title 27 Section 20690 and the performance metrics outlined by the SCL LEA. Based on the information available at the time the evaluation report was written, our recommendation was for the continued use of the ADC as there were positive impacts already being observed and substantiated by available data presented in the evaluation report.

As we discussed at our meeting held on April 27, 2017, we continue to collect data and make observations that strongly indicate the continued use of the ADC will ultimately result in the overall benefit of increased efficiencies to the site's gas collection and control system as well as the leachate collection system that will also contribute to the reduction of potential off-site odors. These data and observations include the following:

- During the installation of vertical gas collection wells recently drilled in the Cell CC-3B portion of the site where only the ADC has been used as daily cover (Monday – Friday), observations of drilling activities have shown the following:
 - A substantial decrease in the amount of liquids present in the waste material;
 - Less odorous waste material being brought up from the boring;
 - Less decomposition of waste material in the drilling spoils (due to less liquid).

- Daily observations of the areas where the ADC is used indicate no odors observed from the underlying waste at the start of operations;
 - These observations are recorded on daily sheets and submitted with the monthly ADC report submitted to DPW and the LEA.
- Daily observations of the areas where the ADC is used show no presence of vectors substantiating the ADC is as effective as soil in controlling vectors.

Based on this information, we respectfully request an extension of the ADC Pilot Project to October 12, 2017.

Sincerely,



Rob Sherman
General Manager
Sunshine Canyon Landfill

Enclosure

Cc: Mr. Bahman Hajialiakbar, LA County DPW
Mr. Martins Aiyetiwa, LA County DPW
Mr. David Thompson, SCL LEA



GAIL FARBER, Director

COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

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ALHAMBRA, CALIFORNIA 91803-1331
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ADDRESS ALL CORRESPONDENCE TO:
P.O. BOX 1460
ALHAMBRA, CALIFORNIA 91802-1460

IN REPLY PLEASE
REFER TO FILE: **EP-5**

October 27, 2015

Mr. Rob Sherman, General Manager
Sunshine Canyon Landfill
Republic Services, Inc.
14747 San Fernando Road
Sylmar, CA 91342-1021

Dear Mr. Sherman:

SUNSHINE CANYON CITY/COUNTY LANDFILL PROPOSED ALTERNATIVE DAILY COVER PILOT PROJECT UTILIZING GEOSYNTHETIC PANEL PRODUCT

Republic Services (Republic) submitted a letter dated April 13, 2015, which included a project proposal dated November 2014, to the Department of Public Works requesting to conduct a 1-year pilot project using Environmental Products, Inc.'s (EPI's), Extended Enviro™ cover as an alternative daily cover (ADC) in lieu of the 9 inches of soil currently being used on-site for daily cover. Subsequently, Republic submitted two more revised project proposals with the latest submittal on August 20, 2015 (Report). The revisions were made to address Public Works' requests to further clarify the proposal's performance measurements, emergency response measures, and public outreach requirements.

Based on Public Works' evaluation of the Report dated August 20, 2015, and consistent with the adopted environmental documentation for the Sunshine Canyon City/County Landfill (Landfill), Public Works hereby modifies the additional corrective measures that it imposed in accordance with Condition 45N of the Conditional Use Permit (CUP) No. 000-194-(5) as set forth in letters dated October 22, 2014, and February 26, 2015, to permit Republic to implement its proposed ADC pilot project for a period of 1 year from the implementation date, subject to the "Conditions of Approval" specified in this letter.

Mr. Rob Sherman
October 27, 2015
Page 2

This letter addresses only Republic's request for a modification of the additional corrective measures imposed by Public Works in accordance with Condition 45N of the CUP, and does not address any other approvals that may be required by any other agencies in order for Republic to implement the proposed ADC pilot project.

In a letter dated October 5, 2015, the Sunshine Canyon Landfill Joint City/County Technical Advisory Committee (TAC) stated that it endorses the ADC pilot project. On October 8, 2015, Republic notified Public Works that, on the basis of the TAC's letter, it planned to move forward with the pilot project commencing October 12, 2015.

To the extent that Republic considered the TAC's October 5, 2015, letter to effectuate a modification of Public Works' 9-inch cover requirement to allow for the use of the ADC, Republic misconstrued the TAC's letter and its advisory role. It is important that Republic understand that it is required to comply with the County's CUP.

Objectives of the Pilot Project

The objectives of this ADC 1-year pilot project as stated in the Report are as follows:

- Determine if the geosynthetic panel product material meets the performance requirements of Title 27, Section 20690 to meet the requirements for controlling blowing litter, vectors, fires, odor and scavenging.
- Determine if the geosynthetic panel product material is as effective for controlling odors as 9 inches of compacted soil as a daily soil cover material.

An evaluation of the effectiveness of the geosynthetic panel product will be conducted throughout the 1-year term of the pilot period, as well as at the conclusion of this 1-year period. Information collected during the pilot period will be used to determine (1) whether the project objectives have been met, (2) if it results in improvement in the landfill gas collection and management system, and (3) if it leads to potential reduction in odor nuisance and complaints from the surrounding community.

California Environmental Quality Act Compliance

In December 1999, the City of Los Angeles adopted a Final Subsequent Environmental Impact Report (FSEIR) and a General Plan Amendment and Zone Change (GPA/ZC) allowing Browning-Ferris Industries, now Republic, to operate and maintain a separate City Landfill and eventually a joint City/County Landfill. In 2007, the County approved an addendum to the FSEIR in connection with its approval of the CUP.

Mr. Rob Sherman
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Page 3

The FSEIR calls for the application of 6 inches of daily cover or the use of an approved alternative daily cover. We note that the Sunshine Canyon Landfill Local Enforcement Agency has approved the use of the proposed ADC. In addition, Mitigation Measure No. 7.06 of the Mitigation Monitoring and Reporting Summary (MMRS) adopted by the County, provides that if an odor problem develops, appropriate control measures shall be implemented, which include the application of daily cover material or more frequent application of cover material to seal the landfill surface, or adjustments to the wells, equipment and operation of the landfill gas collection and recovery system.

Among the odor control measures contained in the Mitigation Reporting and Monitoring Program (MRMP) adopted by the City, mitigation measure no. 33 provides that when an odor problem develops, appropriate control measures shall be implemented, which include the application of additional dirt daily cover material, or more frequent application of the cover material to seal the landfill surface, or adjustments to the wells, equipment and operation of the landfill gas collection and recovery system.

As discussed in further detail in this letter, with the conditions spelled out in this letter, the proposed ADC is an appropriate measure for controlling odors in conjunction with other corrective measures that are set forth in our letters dated September 27, 2010; October 22, 2014; and February 26, 2015. It is our determination that the ADC Pilot Project as described in this letter is within the scope of the project that is the subject of the FSEIR. Therefore, Public Works is approving the ADC pilot project, subject to the following conditions:

General Conditions of Approval

1. **Effective Area** – These requirements apply to all areas within the "Limits of Fill" of Exhibit "A-2" as defined in the combined "City/County Project" pursuant to the Los Angeles County CUP.
2. **Duration of Pilot Project** – 1 year from the date of this letter.
3. **Termination** – Public Works may terminate the approval of the pilot project at any time, including but not limited to the following causes, as determined by Public Works in its sole discretion:
 - a. Republic has failed to comply with any of the requirements specified herein, including the *Evaluation Standards and Program Requirements*, *Reporting Requirements*, and *Additional Requirements*, as specified.

- b. Problems arise with the use of the ADC material that cannot be corrected.
- c. The use of the ADC material does not meet the objectives of the pilot project as stated in this letter and in the Report.

If, at any time during the term of this pilot project, Public Works terminates the approval of the pilot project, Republic shall revert back to using 9 inches of soil as daily cover at the Landfill unless Public Works approves another form of daily cover in accordance with Condition 45N, in order to promote best gas management practices at the site and to protect public health and safety.

Evaluation Standards and Program Requirements:

- 4. ADC Material Specifications – The ADC material to be used for the implementation of this project shall be limited to a non-reusable, geosynthetic Extended Enviro™ cover with a thickness of 1.75 millimeters, as stated in the proposal. Any proposed change to this ADC material will require prior approval from Public Works.
- 5. Equipment Specifications – The Extended Enviro™ cover shall only be deployed using EPI's Extended Enviro™ Cover System Deployer Model 800 (Deployer). Any proposed change to this equipment will require prior approval from Public Works.
- 6. Soil Usage – Soil to be used as daily cover at the end of operation on Saturdays, or as ballast material during ADC application or as intermediate daily cover, must be free of sulfate (SO₄) prior to its usage, or at a level acceptable to Public Works. Prior testing of the soil must be performed to ensure that sulfate is not present in the soil at a level not acceptable to Public Works. Test results must be provided to Public Works for approval. However, every source of soil material must be tested and approved prior to its use at the site.
- 7. ADC Material Procedures – The ADC material shall only be applied as described in the following restrictions:
 - a. The ADC material shall be applied at the end of each operating day or at more frequent intervals (except Saturday) and shall be left in place at the start of the following day's operations.

- i. No removal of this ADC material shall be conducted after it is applied at the Working Face.
 - ii. The ADC material will be placed over the entire deck of the operating day's Working Face.
 - iii. The maximum exposure time for the ADC material shall not exceed 5 days.
 - iv. The ADC material shall not be placed on any outside slopes or slopes that will not be part of the operating day's Working Face for longer than 180 days.
 - v. The ADC material shall not be used for intermediate or final cover.
 - b. Six inches of soil shall be used for daily cover at the close of operations on Saturdays and shall remain in place on Monday mornings.
 - i. No "peeling back" of the soil cover shall be conducted after it is applied at the Working Face.
 - ii. Only soil may be used as cover on the outside and temporary slopes.
 - c. The ADC material will be used on one lift per day.
 - d. The maximum size of the Working Face deck area shall be no larger than 3 acres.
8. Material Placement – The ADC material shall be placed as detailed in the Report as follows:
 - a. General Placement Procedure
 - i. The Deployer is loaded with a roll of the Extended Enviro™ cover and on-site ballast material.
 - ii. The Deployer is positioned on the outside edge of the cover area to deploy the first panel of the ADC material. The outside edge shall be positioned at a minimum of 5 feet from the outside of the waste material.
 - iii. During the application process, the ADC material is unrolled from the Deployer while ballast material is simultaneously discharged at a controlled rate to securely anchor the ADC material onto the Working Face.
 - iv. On successive adjacent runs to deploy the ADC material. The material is placed so that it overlaps by not less than 10 percent, thus forming a compression-type seal creating a continuous closure and impermeable barrier between the waste and the environment.

- b. Placement During Windy Conditions – During high-wind conditions, the following operational measures shall be implemented and maintained:
 - i. Wind direction and speed must be established to better determine how the ADC material will be deployed.
 - ii. Upon determination of the wind direction, the ADC material will be placed parallel to the wind direction to minimize the potential uplifting of the material.
 - iii. Additional overlap of the ADC material can be applied, provided that natural tearing and puncturing of the overlapped material as a result of the heavy equipment operating on top of previously covered trash is maintained.

- c. Placement During Rainy/Stormy Conditions – During rainy/stormy conditions, the following operational measures shall be implemented and maintained:
 - i. Intactness of the ballast material shall be maintained to ensure that the ballast material is not washed away by water runoff.
 - ii. No ponding on the surface of the ADC material shall occur. If ponding occurs, appropriate measures shall be taken to resolve this issue.
 - iii. Placement of the ADC material on the working face shall be appropriately deployed to prevent stormwater run-off underneath the ADC material and to inhibit continuous contact of stormwater on the disposed solid waste.

If conditions such as high-winds or heavy rains prevent compliance with these restrictions and prevent the ADC material from functioning properly, the operator shall cover the Working Face with 9 inches of soil, which shall be kept in place at the beginning of the next operating day. No "peeling back" of the soil cover shall be conducted after it is applied at the Working Face.

Reporting Requirements:

- 9. Performance Requirements – In order to determine the effectiveness of the ADC material, the ADC material shall be evaluated in accordance with the performance requirements and standards set forth in CCR Title 27, Section 20690 and 20695, respectively. Evaluation of performance criteria shall be conducted as follows:
 - a. Vector
 - i. Threshold values for vector populations shall be established prior to commencement of the ADC pilot project; therefore, provide these to us within

14 days from the date of this letter. Based on these threshold values, daily inspection of vector populations shall be recorded in accordance with the recording requirements specified in CCR Title 27, Section 20690(a)(1)(D).

- ii. Any vector infestation shall be recorded in the Monthly Reporting Requirements stipulated herein, and controlled immediately upon observation. If infestation cannot be controlled, the use of the ADC material shall be ceased and be replaced with 9 inches of soil as daily cover.
- b. Fire
- i. Any burning material, or any solid waste that has the potential to cause fire, shall not be disposed of at the Working Face and shall not be covered with the ADC material. Procedures on handling such materials or solid waste shall be subject to the requirements specified in CCR Title 27, Section 20695(b).
 - ii. Any fire incidents, or relocation of any burning material or any solid waste that has the potential to cause fire, shall be recorded in the Monthly Reporting Requirements stipulated herein.
- c. Litter
- i. The operator shall control windblown litter from the operating day's Working Face.
 - ii. If wind conditions are too extreme for the ADC material to remain intact once applied and all operational adjustments as described in Condition 6 have been proven to be ineffective, the operator shall cease the application of the ADC material and replace it with 9 inches of soil for cover until such time as conditions permit the use of the ADC material.
- d. Scavenging
- i. No scavenging activities shall be allowed.
 - ii. Any scavenging activities shall be reported to the operations manager and appropriate action must be taken.
- e. Odor
- i. Daily observation of the Working Face area for any potential odor sources before, during, and after the placement of the ADC material shall be conducted.

- ii. Current odor management program as stipulated in the Final Odor Plan of Action dated June 15, 2012, shall continue to be implemented.
 - iii. If odor sources have been found within the Working Face area, appropriate odor control measures shall be implemented. If odor persists, Republic may be required to discontinue the use of the ADC material and return to using 9 inches of soil for daily cover in accordance with the conditions concerning "Termination" under the "General Conditions of Approval" of this letter.
 - iv. Any potential odor sources from the Working Face shall be recorded in the Monthly Reporting Requirements, and shall include, but not be limited to, the approximate location of the source, time and/or period of the duration of odor, weather condition, and odor control measures taken.
- f. In addition to the above performance criteria, Republic shall also establish a base line for two areas of the site: (1) where 9 inches of soil cover has been applied, and (2) where the ADC material is applied. The following observations shall be made on both areas in order to measure the performance of the pilot project in comparison to the use of 9 inches of soil cover.
- i. Surface Gas Emissions – Republic shall monitor for any surface gas exceedances, in accordance with the South Coast Air Quality Management District Rule 1150.1.
 - ii. Landfill Gas Collection and Recovery System – Republic shall locate wells impacted by fluid build-ups, indicate the amount of fluid that is pumped-out from the well, and record the vacuum pressure before and after fluid is pumped-out.
 - iii. Leachate Collection and Recovery System – Republic shall record the amount of leachate that is collected from the sump.
 - iv. Public Works reserves the right to add additional criteria that it determines are necessary to evaluate the performance of the ADC at the site.

10. Environmental Monitoring

- a. In addition to implementing the Landfill's current odor management program, which includes on-and-off site odor monitoring, Republic shall also examine the ADC material at the end of each operating day after the Working Face has been completely covered with the ADC material. Any tears, punctures, or unusual observations of the ADC material during its application and/or prior to placing new trash on top of the previous day's application of the ADC material, shall be documented and included in the Monthly Reporting Requirements.
- b. Weather data shall also be collected on a daily basis and reported in the Monthly Reporting Requirements. Weather data shall include but not be limited to ambient temperature, humidity conditions, wind and speed direction, and rainfall.
- c. Daily observations of vectors, blown litter, fire, and any indication of scavenging shall also be included.

11. Monthly Reporting Requirements – Republic shall provide a monthly report to Public Works summarizing all monitoring observations and maintenance issues of the ADC pilot project, including but not limited to any tears, punctures, or unusual observations related to the application of the ADC material; any immediate odors detected at the vicinity of the Working Face during and after the application of the ADC material; and any unusual occurrences at the Working Face, such as, fire, vectors, blowing litter, and scavenging. A copy of the daily logs from the monitoring requirements specified in Republic's proposal and on this letter must also be provided in the monthly report as specified herein.

12. Additional Requirements

- a. Republic shall within 30 days of the date of this letter implement all requirements that were previously required by Public Works in the letters dated October 22, 2014, and February 26, 2015, pursuant to Condition 45N of the CUP except to the extent modified by this letter.
- b. Republic shall cooperate with Public Works in hiring an independent consultant to determine, evaluate, and make recommendations regarding the quality and permeability of soil used for daily and intermediate cover materials at the site.

13. Data Analysis – At the conclusion of this ADC pilot project, Republic shall submit a detailed report documenting all of the observations, monitoring data and results, and recommendations for continued use of the ADC material as an ADC for Sunshine Canyon Landfill. Such Data Analysis and Evaluation Report must also include all documentation establishing whether the project's stated objectives have been met.

Conclusions and Results of the ADC Pilot Project:

At the conclusion of the ADC pilot project, Public Works will evaluate the Data Analysis and Evaluation Report to determine if the project objectives have been met and will consider whether continued modification/elimination of the 9-inch daily soil cover requirement to allow the use of the ADC will protect public health and safety within the meaning of Condition 45N of the CUP. If the project objectives are met, Public Works, in consultation with the Departments of Regional Planning and Public Health, may modify or eliminate the requirement specifying the use of 9 inches of daily soil cover and allow the continued use of the ADC material on a more permanent basis.

All documents and reports required by this letter shall be submitted to the following address:

County of Los Angeles
Department of Public Works
Environmental Programs Division
P.O. Box 1460
Alhambra, California 91802-1460
Attention Martins Aiyetiwa, Landfills Section

Mr. Rob Sherman
October 27, 2015
Page 11

If you have any questions, please contact Mr. Martins Aiyetiwa at (626) 458-3553, Monday through Thursday, 7 a.m. to 5:30 p.m.

Very truly yours,



GAIL FARBER
Director of Public Works



RICHARD J. BRUCKNER
Director of Regional Planning

KM:jl
P:\Sec\HOA_1264552_1 Sunshine ADC Pilot Program

cc: Department of Regional Planning (Maria Masis, Jon Sanabria, Dennis Slavin)
Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force
South Coast Air Quality Management District (Mohsen Nazemi, Ed Pupka)
Sunshine Canyon Landfill – Local Enforcement Agency (Dave Thompson, Gerardo Villalobos)
Sunshine Canyon Landfill – Community Advisory Committee (Becky Bendikson, Wayde Hunter)
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North Valley Coalition of Concerned Citizens (Wayde Hunter)
Granada Hills North Neighborhood Council



COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

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GAIL FARBER, Director

September 27, 2010

ADDRESS ALL CORRESPONDENCE TO:
P.O. BOX 1460
ALHAMBRA, CALIFORNIA 91802-1460

IN REPLY PLEASE REFER TO FILE **EP-5**

Mr. Kurt Bratton
Vice President
Republic Services, Inc.
Sunshine Canyon Landfill
14747 San Fernando Road
Sylmar, CA 91342-1021

Dear Mr. Bratton:

ODOR NUISANCE AT SUNSHINE CANYON LANDFILL CONDITIONAL USE PERMIT NO. 00-194(5)

Based on information received by this Department and provisions established in Condition No. 45.N of the Sunshine Canyon Landfill (Landfill) Conditional Use Permit (CUP), we are hereby requiring Republic Services, Inc./Browning-Ferris Industries (Republic) to implement additional corrective measures to reduce the odor nuisance resulting from activities related to the operations of the Landfill.

Background

Since late 2009, residents living in the vicinity of the Landfill and staff/students from the nearby Van Gogh Elementary School have filed numerous complaints alleging odors from activities and operations occurring at the Landfill. According to Republic's Quarterly Dust and Odor Complaint Reports and Monthly Reports to the Sunshine Canyon Landfill - Local Enforcement Agency (SCL-LEA), as well as the Order for Abatement issued by the South Coast Air Quality Management District (AQMD) Hearing Board on March 24, 2010, more than 300 complaints were filed in 2009, of which more than half occurred during the month of November. The complaints continued into the first two months of 2010 totaling more than 160 complaints. These complaints resulted in numerous Notices of Violations issued by the AQMD to Republic for creating a Public Nuisance, the highest being five (5) Notices issued in November 2009.

As required by the Order for Abatement and in an attempt to relieve the impacts on the nearby residents, Republic implemented various corrective actions. Conditions pursuant to the Order included: restricting the size of the working face; reducing the amount of trash delivered by transfer stations on Monday mornings; and utilizing misting and odor control systems at the working face.

Other mitigation measures being undertaken include developing study proposals regarding daily cover materials and landfill gas emissions controls, and a plan to augment the vegetation in the southern areas of the Landfill.

Findings and Determination

While we recognize Republic's efforts to comply with AQMD's Order for Abatement, we have determined that additional corrective measures are necessary at this time to further reduce odors related to operations at the working face which is identified in the Order for Abatement as a potential odor contributor. Our determination is based on:

- the frequency and duration of the odor complaints from the surrounding community
- public testimony received by AQMD's Hearing Board during the Order for Abatement proceedings
- consultation with the SCL-LEA, AQMD, and the County Department of Regional Planning
- information contained in Republic's draft Working Face and DustBoss Study Proposal, dated July 28, 2010
- Public Works' physical inspections of the site and surrounding areas

Republic's current practice of removing nearly six inches of soil cover on Monday mornings and leaving approximately three inches of cover remaining on the working face is inconsistent with established sound engineering practice, and a key contributing factor to the odor conditions. This practice compromises the integrity of the soil cover thereby significantly contributing to an odor nuisance and posing a risk to public health and safety.

Additionally, Republic's practice of using tarps as daily cover, from Monday through Friday, on the advancing side of the working face deviates from the standard application of compacted soil as daily cover, which has been proven to be effective in controlling odor and other nuisances. Furthermore, using soil as an odor reduction measure is consistent with the City of Los Angeles' Mitigation Reporting and Monitoring Program, dated February 25, 1999, which provides for the application of additional dirt as daily cover material to mitigate odor impacts (see enclosed Section 4.2.13, No. 33, page 7). The mitigation measure is also consistent with the certified Subsequent Environmental Impact Report for the project.

Corrective Measures

Therefore, pursuant to CUP Condition No. 45.N, Republic is required to implement the following corrective measures within 30 days of the date of this letter:

1. Terminate the use of any alternative materials as daily cover other than compacted soil.
2. Cover disposed solid waste with a minimum of nine inches of compacted soil at the end of every operating day, Monday through Saturday, and at more frequent intervals as necessary, to control vectors, fires, odors, blowing litter, and scavenging. Tarp may only be used to enhance the control of vectors or other nuisance, but may not replace the use of soil.
3. Discontinue the practice of removing compacted soil cover at the beginning of an operating day. The compacted soil cover applied at the end of the previous operating day must be kept in-place.
4. Submit to Public Works for review and approval an Odor Mitigation Plan that incorporates the following elements at a minimum:
 - a. Identify and provide status on the measures currently being implemented as required by the AQMD's Order for Abatement
 - b. A program for managing odoriferous loads currently received at the Landfill, which would include the following at a minimum:
 - Provide a trained technician to identify odiferous loads.
 - Immediately bury odiferous waste loads at the working face within one hour of its arrival.
 - Develop a program to minimize odors from transfer trucks and direct haul loads.
 - c. An odor patrol program, which would include the following at a minimum:
 - Provide a trained technician to conduct odor patrols in the surrounding neighborhoods at a frequency of one patrol per hour from 6 a.m. to 10 a.m., Monday through Saturday, and during adverse wind conditions¹.

¹ As defined in AQMD's Order for Abatement dated March 24, 2010, Adverse Wind Conditions mean either: 1) wind speed measured at the existing monitor at the southern berm from all directions as less than 2 mph; or, 2) wind speed measured at the same monitor coming from the north/northeast direction from between 320 degrees and 15 degrees at less than 15 mph. Wind speed is based on measured winds from three continuous one-hour averaging periods commencing at 3 a.m. Any hour in which there is measurable precipitation will not be classified as an adverse wind condition, in that precipitation generally suppresses odors at landfills.

- If odor is detected, identify its potential and/or actual source, including those that may not be related to the Landfill's operation, such as an odorous trash dumpster or transfer trucks.
 - If odor is determined to be related to the Landfill's operation, take immediate action to reduce the odor. Document the streets patrolled on a map, time of the patrol, potential source of odor, and immediate actions taken by the Landfill.
- d. A landfill gas mitigation plan in preparation for the next rainy season since landfill gas emissions from either the landfill surface or landfill gas control equipment is cited as a potential contributor in the AQMD's Order for Abatement. The plan should include the following at a minimum:
- Description of the site's current Gas Monitoring and Control Plan, including a map showing locations of gas monitoring probes, gas extraction wells, horizontal and vertical gas collection lines, etc.
 - Compliance history of the site's landfill gas migration control program from January 1, 2009, to the present quarter as well as any corrective actions.
 - Discuss the impacts of the most recent heavy rains on the landfill gas collection system, including identifying locations of damage due to soil erosion, as well as any corrective actions or mitigation measures.
 - A work plan that includes preventive measures, such as identifying and filling any surface cracks and installing additional extraction wells, as well as contingency measures.
 - An implementation schedule for the above work plan.
5. Include in the Quarterly Dust and Odor Reports, which are required by CUP Condition No. 45.N, the status and effectiveness of mitigation measures 1 through 3 above, and the Odor Mitigation Plan.
6. The corrective measures described above shall not be modified or terminated without prior written approval of the Director of Public Works.

Failure by Republic to implement these corrective measures shall constitute a violation of the CUP and be subject to the penalty provision described in Condition No. 11 of the CUP.

Mr. Kurt Bratton
September 27, 2010
Page 5

If you have any questions, please contact Mr. Martins Aiyetiwa of this office at (626) 458-3553, Monday through Thursday, 7 a.m. to 5:30 p.m.

Very truly yours,

GAIL FARBER
Director of Public Works



PAT PROANO
Assistant Deputy Director
Environmental Programs Division

LL:dy
P:\sec\Sunshine Canyon Landfill CUP

Enc.

cc: South Coast Air Quality Management District (Edwin Pupka, David Jones)
Department of Regional Planning (Richard Bruckner, Maria Masis, Bruce Durbin)
Department of Public Health (Cindy Chen, Gerry Villalobos)
Sunshine Canyon Landfill Technical Advisory Committee (Richard Bruckner, Michael LoGrande)
City of Los Angeles Department of City Planning (Michael LoGrande, Ly Lam)
Sunshine Canyon Landfill - Local Enforcement Agency (Program Manager)
Members of the Los Angeles County Solid Waste Management Committee/
Integrated Waste Management Task Force
Sunshine Canyon Landfill - Community Advisory Committee (Becky Bendikson, Wayde Hunter)

ATTACHMENT G



GAIL FARBER, Director

COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

900 SOUTH FREMONT AVENUE
ALHAMBRA, CALIFORNIA 91803-1331
Telephone: (626) 458-5100
<http://dpw.lacounty.gov>

ADDRESS ALL CORRESPONDENCE TO:
P.O. BOX 1460
ALHAMBRA, CALIFORNIA 91802-1460

IN REPLY PLEASE

REFER TO FILE: **EP-5**

December 20, 2016

Mr. Rob Sherman, General Manager
Sunshine Canyon Landfill
Republic Services, Inc.
14747 San Fernando Road
Sylmar, CA 91342-1021

Dear Mr. Sherman:

SUNSHINE CANYON CITY/COUNTY LANDFILL PROPOSED INTERMEDIATE COVER ENHANCEMENT (ICE) DEMONSTRATION PROJECT

We have reviewed your request to conduct a 6-month demonstration project for the use of Posi-Shell[®] to enhance intermediate cover areas at the Sunshine Canyon Landfill. The request is contained in your submittal dated August 11, 2016, as Attachment D entitled:

- Revised Proposal for a Demonstration Project for Intermediate Cover Options, Sunshine Canyon Landfill.

The objective of the demonstration project is to determine if the Posi-Shell[®] spray-on mixture is effective as intermediate cover material in controlling landfill gas surface emission, odor, and leachate leaking from the intermediate slope areas. The Work Plan also stated that this demonstration project is a requirement of Condition 5 of the Stipulated Agreement between Republic Services and the Sunshine Canyon Landfill – Local Enforcement Agency, which seeks to improve performance of the intermediate cover at the landfill.

Based on Public Works' evaluation of the submitted work plan, and consistent with authority granted under Condition 45 (N) of the Landfill's Conditional Use Permit No. 00-194-(5), Public Works hereby approve Republic's request to conduct the

proposed ICE demonstration project for a period of six months from the implementation date subject to the following "Conditions of Approval":

General Conditions of Approval

1. Duration of Pilot Project – six months from the implementation date.
2. Termination – The Director of Public Works may terminate the approval of the pilot project at any time, including but not limited to the following causes, at the Director's sole discretion:
 - a. Republic has failed to comply with any of the requirements specified herein, including the *Evaluation Standards and Program Requirements, Reporting Requirements* and *Additional Requirements*, as specified.
 - b. Problems arise with the use of the Posi-Shell[®] that cannot be corrected.
 - c. The use of the Posi-Shell[®] material does not satisfy the objectives of the pilot project as stated in this letter and in the Report.

If at any time during the term of this demonstration project, the Director of Public Works terminates the approval of the demonstration project, Republic shall revert back to complying with all conditions and requirements pertaining to intermediate cover as stipulated in the CUP.

Specific Conditions of Approval

3. Demonstration Areas – This demonstration project shall be limited to grids M11, L12, L13, O10, O9, N10, and N9 (map attached) and shall be implemented as follow:
 - a. Posi-Shell[®] with the Portland cement additive shall be used to cover grids, M11, L12, L13, and O10. Grids M11, L12, and L13 will have Portland cement added to the mixture and deployed at two square feet per gallon. Grid O10 will have Portland cement added to the mixture and deployed at the normal application thickness of four square feet per gallon.
 - b. Application of additional six inches of compacted soil will be added to the existing intermediate cover on grids N10, N9, and O9. For comparison purposes, this will be conducted concurrently with the Posi-Shell[®] demonstration project.

4. Republic shall study and report on the impact that this demonstration project has on the growth of vegetation on the intermediate slopes.
5. If the use of Posi-Shell[®] application is to be proposed or recommended for a more permanent basis, Republic shall submit a detailed plan for Public Works' review and approval on how the plan will satisfy CUP's Condition 44.A and approved CEQA mitigation requirements that require all slopes inactive for 180 days or longer be planted with interim vegetation.
6. Republic shall ensure that the demonstration project will not inhibit the site's ability to maintain proper erosion controls and odor control during the demonstration period.

Monitoring Requirement

7. Republic shall perform all required South Coast Air Quality Management District Rule 1150.1 surface emission monitoring at the landfill on a monthly basis. For the demonstration project, Republic shall perform the following:
 - a. Establish a base line of instantaneous and integrated surface emission on grid M11, L12, L13, O10, O9, N10, and N9.
 - b. Record instantaneous and integrated surface emission on grid M11, L12, L13, O10, O9, N10, and N9.
 - c. Conduct daily visual inspections on these above grids for any cracks, erosion control issues, and damages.
 - d. Keep a weekly log on the effect of weather and operational activities that impacted the demonstration grids.

Reporting Requirement

8. Republic shall provide a monthly report of records and logs of 7b, 7c, and 7d to Public Works summarizing all monitoring observations and maintenance issues of the demonstration project; any immediate odors detected at the vicinity of the demonstration grids.

Mr. Rob Sherman
December 20, 2016
Page 4

Data Analysis

9. At the conclusion of this demonstration project, Republic shall submit a detailed report documenting all of the observations, monitoring data and results, and recommendations regarding use of Posi-Shell[®] at the Sunshine Canyon Landfill. Such Data Analysis and Evaluation Report must also include all documentation establishing whether the project's objectives as stated herein have been met.

Public Works reserves the right to add additional monitoring and reporting requirement that it determines are necessary to evaluate the performance of the ICE Demonstration Project at the site.

Conclusions and Results of the Demonstration Project:

At the conclusion of the Demonstration Project, the Director of Public Works will evaluate the Data Analysis and Evaluation Report to determine if the project objectives have been met and will consider whether the use of Posi-Shell[®] had enhanced the intermediate cover at the site. If the project's objectives are met, the Director of Public Works, in consultation with the Director of Regional Planning, may approve the use of Posi-Shell[®] on the intermediate cover on a more permanent basis.

All documents and reports required by this letter shall be submitted to the following address:

County of Los Angeles
Department of Public Works
Environmental Programs Division
P.O. Box 1460
Alhambra, CA 91802-1460
Attention: Martins Aiyetiwa, Landfills Section

This letter addresses only Republic's request for an approval of the work plan to conduct a site specific demonstration project and does not address any other approvals that may be required by any other agency in order for Republic to implement the proposed demonstration pilot project. Republic is required to obtain necessary approvals and clearances relating to this project that may be required by other regulatory agencies. Additionally, this approval does not release Republic from

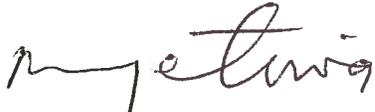
Mr. Rob Sherman
December 20, 2016
Page 5

mitigation requirements as prescribed in Public Works' March 30 and July 14, 2016, odor nuisance letters.

If you have any questions, please contact me at (626) 458-3553, Monday through Thursday, 7 a.m. to 5:30 p.m.

Very truly yours,

GAIL FARBER
Director of Public Works



MARTINS AIYETIWA
Senior Civil Engineer
Environmental Programs Division

MA:jl

P:\Sec\Sunshine ICE Project Approval (final).doc

cc: Department of Regional Planning (Dennis Slavin, Jon Sanabria, Maria Masis)
City of Los Angeles Planning Department (Lisa Webber, Ly Lam, Nicholas Hendricks)
South Coast Air Quality Management District (Laki Tsopulo, Cher Snyder, Amir Dejbakhsh)
Sunshine Canyon Landfill – Local Enforcement Agency (Dave Thompson, Maurice Pantoja)
Sunshine Canyon Landfill – Community Advisory Committee (Wayde Hunter)
Granada Hills North Neighborhood Council
Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force



14747 San Fernando Road
Sylmar, California 91343

May 16, 2016

Mr. Rob Sherman, General Manager
Republic Services
Sunshine Canyon Landfill
14747 San Fernando Road
Sylmar, CA 91342

Subject: Sunshine Canyon City/County Landfill (SWIS # 19-AA-2000)
LEA Approval of Intermediate Cover Enhancement Project

Dear Mr. Sherman,

On April 1, 2016, the Sunshine Canyon Landfill Local Enforcement Agency (LEA) received a revised proposal for the Intermediate Cover Enhancement Project (Project) at the Sunshine Canyon Landfill (Landfill). The proposal was submitted as part of the Stipulated Agreement to address landfill gas and leachate issues related to the Landfill. The Project as proposed is scheduled to run for a period of six months which will allow for the evaluation of several operational approaches to improve the performance of the intermediate cover.

The LEA has reviewed the revised proposal and has determined that it meets the intent of the Project.

In addition to the summary report that will be provided after the conclusion of the Project, the LEA requests the following:

- Submit to the LEA results of the monthly surface emission monitoring for grids L12, L13, M11, N9, N10, O9 and O10 within 30 days for each of the six months of the Project period.
- The LEA shall reserve the right to expand on the types of other intermediate cover enhancements during the Project period to include, but not limited to the:
 - Application of a vegetative layer on a grid to be selected by the LEA.
 - Increase in the number of grids to receive intermediate cover enhancements.
- The LEA must be notified at least 7 days prior to the start of the Project.
- Project activities commence no later than the week of June 5, 2016

The LEA reserves the right to suspend, modify or revoke this approval if problems are observed during the six month Pilot period. This approval is only for areas of the pilot project under the jurisdiction of the LEA. Note that the LEA will be separately recommending additional operational measures for addressing the fresh trash odors at the working face.

If you have any questions regarding the LEA approval, I can be contacted at (626) 430-5550 or at gvillalobos@ph.lacounty.gov.

Sincerely,



Gerry Villalobos
SCL LEA Program Manager

cc: David Thompson, SCL LEA

ATTACHMENT H

SUNSHINE CANYON LANDFILL

March 28, 2017

VIA EMAIL

Clerk of the Board South Coast Air Quality Management District 21865 Copley Dr. Diamond Bar, CA 91765 ClerkofBoard@aqmd.gov	Nicholas Sanchez, Esq. Senior Deputy District Counsel South Coast Air Quality Management District 21865 Copley Dr. Diamond Bar, CA 91765 nsanchez@aqmd.gov
--	--

Re: In the Matter of SCAQMD v Browning-Ferris Industries of California
Case No. 3448-14
Condition 10, Intermediate Cover Proposal Expedited Schedule

Dear Clerk and Mr. Sanchez,

Per the Stipulated Abatement Order Condition 10 in the above-matter, an expedited schedule is attached for upgrading and improving the targeted intermediate cover areas at Sunshine Canyon Landfill. The schedule and areas identified are in alignment with the recommended solutions identified in the Intermediate Cover Enhancement Proposal report submitted on 3/15/17.

The expedited schedule calls for 115 acres of intermediate cover area to receive enhancements with portions of the work already in progress. The additional activity will be completed as expeditiously as possible throughout the remainder of 2017.

Sincerely,

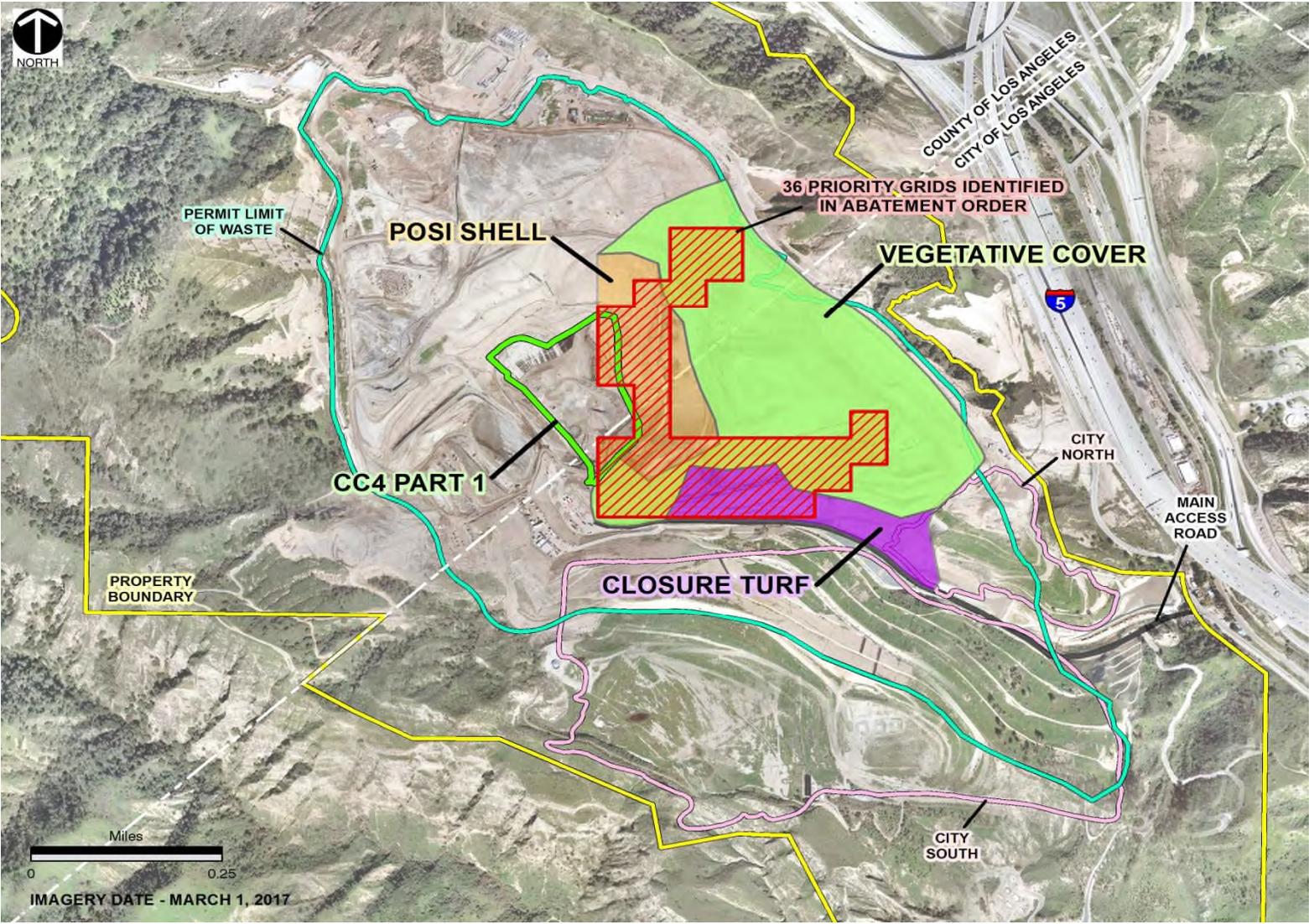


Rob Sherman
General Manager
Sunshine Canyon Landfill

Sunshine Canyon Landfill Intermediate Cover Proposed Expedited Schedule

	JAN	FEB	MAR	APR	MAY	JUNE	JUL	AUG	SEP	OCT	NOV	DEC
Closure Turf Installation (20.7 acres)												
Intermediate Spray-On Cover (37.3 acres)												
Vegetative Cover Trial Area (5 acres)												
Vegetative Cover Preparation and Seeding (57 acres)												

Locations for Enhanced Intermediate Covers



ATTACHMENT I



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

May 3, 2017

Mr. Rob Sherman
Sunshine Canyon Landfill
Republic Services, Inc.
14747 San Fernando Road
Sylmar, CA 91342-1021

Re: *Final Approval* of Revised BMP Plan for the Control and Treatment of Fresh Trash Odor
Sunshine Canyon Landfill (Facility ID 49111)
Hearing Board Case No. 3448-14

Dear Mr. Sherman,

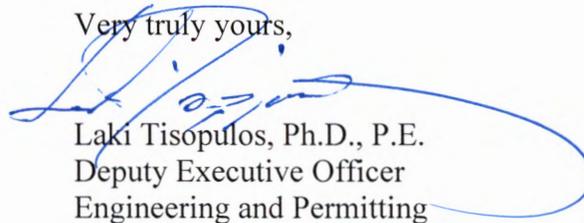
The South Coast Air Quality Management District (SCAQMD) has received the Revised BMP Plan for the Control and Treatment of Fresh Trash Odor (the "Revised BMP Plan"), as required pursuant to Condition 14 of the Stipulated Order for Abatement ("Order") in Hearing Board Case No. 3448-14. The SCAQMD has performed a preliminary review in consultation with its retained expert consultant and hereby grants Final Approval of this plan.

Consistent with the Order, you are now required to implement all provisions of the Revised BMP Plan for the Control and Treatment of Fresh Trash Odor.

SCAQMD will continue its enforcement of the Order, including continued review of all submittals, consideration of facility operational conditions and practices, SCAQMD inspections, monitoring results, expert consultations, and public complaints to ensure compliance with the Order. In the event that changes in circumstances result in recommended changes to the Revised BMP Plan, you will be contacted by SCAQMD staff. The plan shall continue to be implemented unless otherwise revised by the parties, or modified by the SCAQMD Hearing Board.

Thank you for your attention in this matter. It is recommended that you keep a copy of this final approval in your files. Should you have any questions, please contact Andrew Lee, Senior Air Quality Engineering Manager, (909) 396-2643 or alee@aqmd.gov.

Very truly yours,



Laki Tisopoulos, Ph.D., P.E.
Deputy Executive Officer
Engineering and Permitting

cc: Thomas Bruen, esq., via email at tbruen@tbsglaw.com

ATTACHMENT J



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

May 3, 2017

Mr. Rob Sherman
Sunshine Canyon Landfill
Republic Services, Inc.
14747 San Fernando Road
Sylmar, CA 91342-1021

Re: *Final* Approval of Revised Odorous Load Management Plan
Sunshine Canyon Landfill, Facility ID 49111
Hearing Board Case No. 3448-14

Dear Mr. Sherman,

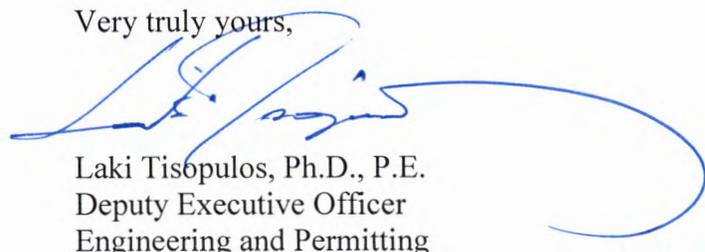
The South Coast Air Quality Management District (SCAQMD) has received the Revised Odorous Load Management Plan (the "Plan"), as required pursuant to Condition 15 of the Stipulated Order for Abatement ("Order") in Hearing Board Case No. 3448-14. The SCAQMD has performed a preliminary review in consultation with its retained expert consultant and hereby grants Final Approval of this plan.

Consistent with the Order, you are now required to implement all provisions of the Revised Odorous Load Management Plan.

SCAQMD will continue its enforcement of the Order, including continued review of all submittals, consideration of facility operational conditions and practices, SCAQMD inspections, monitoring results, expert consultations, and public complaints to ensure compliance with the Order. In the event that changes in circumstances result in recommended changes to the Plan, you will be contacted by SCAQMD staff. The plan shall continue to be implemented unless otherwise revised by the parties, or modified by the SCAQMD Hearing Board.

Thank you for your attention in this matter. It is recommended that you keep a copy of this final approval in your files. Should you have any questions, please contact Andrew Lee, Senior Air Quality Engineering Manager, (909) 396-2643 or alee@aqmd.gov.

Very truly yours,



Laki Tisopoulos, Ph.D., P.E.
Deputy Executive Officer
Engineering and Permitting

cc: Thomas Bruen, esq., via email at tbruen@tbsglaw.com

ATTACHMENT K



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

May 3, 2017

Mr. Rob Sherman
Sunshine Canyon Landfill
Republic Services, Inc.
14747 San Fernando Road
Sylmar, CA 91342-1021

Re: *Interim* Approval of Sunshine Canyon Landfill Assessment of Physical Barriers and Dust-Odor Containment Structures (Condition 16).
Sunshine Canyon Landfill, Facility ID 49111
Hearing Board Case No. 3448-14

Dear Mr. Sherman,

The South Coast Air Quality Management District (SCAQMD) has received the Sunshine Canyon Landfill Assessment of Physical Barriers and Dust-Odor Containment Structures (the "Plan"), as required pursuant to Condition 16 of the Stipulated Order for Abatement ("Order") in Hearing Board Case No. 3448-14. The SCAQMD has performed a preliminary review in consultation with its retained expert consultant and hereby grants Interim Approval of this plan.

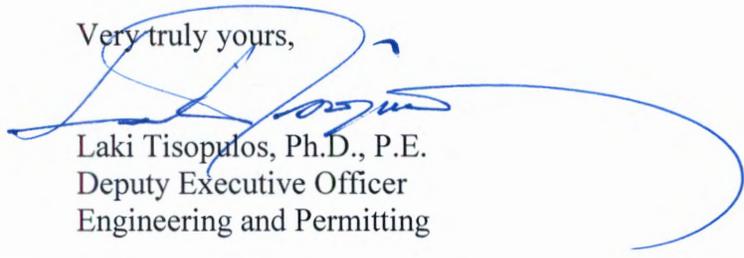
Consistent with the Order, to the extent applicable, you are now required to implement all provisions of the Sunshine Canyon Landfill Assessment of Physical Barriers and Dust-Odor Containment Structures.

However, the SCAQMD has identified the following concern with the proposed plan, which may be addressed during ongoing dialogue with the SCAQMD and the SCL LEA. Control systems using physical barriers contemplated by the Plan, when implemented, will be constructed at a later date due to both operational constraints and potentially extensive approvals required from multiple regulatory agencies. It will be beneficial to combine other mitigation measures as an integral part of the design for proposed physical barriers. Therefore, Interim Approval is granted to facilitate further discussion with the SCAQMD and SCL LEA regarding integration of such additional measures to achieve maximum effect.

SCAQMD will continue its review of the Plan, including consideration of facility operational conditions and practices, SCAQMD inspections, monitoring results, expert consultations, and public complaints to determine whether and when final approval is warranted. In the event that the detailed review of the Plan results in changes to the provisions and/or requirements, you will be contacted by SCAQMD staff. If the Plan warrants final approval, you will receive a final plan approval letter. The current Plan shall be implemented unless otherwise approved by SCAQMD or modified by the SCAQMD Hearing Board.

Thank you for your attention in this matter. It is recommended that you keep a copy of this interim approval in your files. Should you have any questions, please contact Andrew Lee, Senior Air Quality Engineering Manager, (909) 396-2643 or alee@aqmd.gov.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'Laki Tisopoulos', is written over the typed name and title. The signature is fluid and cursive, with a large loop at the end.

Laki Tisopoulos, Ph.D., P.E.
Deputy Executive Officer
Engineering and Permitting

cc: Thomas Bruen, esq., via email at tbruen@tbsglaw.com

ATTACHMENT L

NOTICE OF VIOLATION

Los Angeles County Department of Regional Planning

Please contact the investigating planner **Timothy Stapleton**

Email: tstapleton@planning.lacounty.gov

Phone Number: (213) 974-6453 -- *Monday through Thursday before 10am*

October 25, 2016

Republic Services, Inc.
ATTN: Rob Sherman
14747 San Fernando Road
Sylmar, CA 91342

Code Case No: RPZPE2016002500

Conditional Use Permit: 00-194

Dear Property Owner:

A referral from the Los Angeles County Department of Public Works Environmental Programs Division describing non-compliance with required requests under Condition 45.N of Conditional Use Permit (CUP) 00-194 was provided to the Los Angeles County Department of Regional Planning. Please note Condition 45.N below:

45.N. The Permittee shall submit a quarterly report to the Director of Public Works identifying: (1) all fugitive dust and odor complaints from local residents that the Permittee has received for that quarter regarding the Landfill; (2) all notices of violation issued by the SCAQMD or the County LEA; and (3) all measures undertaken by the Permittee to address these complaints and/or correct the violations. The Director of Public Works and the DPH-SWMP shall each have the authority to require the Permittee to implement additional corrective measures for complaints of this nature when such measures are deemed necessary to protect public health and safety.

Please provide the requested information listed in the July 14, 2016 County of Los Angeles Department of Public Works letter, including attachments, to the satisfaction of Public Works. Should you have any questions regarding this requested information, please contact Bahman Hajjaliakbar at (626) 458-3502 or via email at BHAJI@dpw.lacounty.gov for more details.

Failure of the owner or person in charge of the premises to comply with this order within fifteen (15) days after the compliance date specified herein, or any written extension thereof, shall subject the violator to a noncompliance fee in the amount of \$732.00, unless an appeal from this order is filed within fifteen (15) days after the compliance date. Such appeal must comply with Section 22.60.390(C) of the Los Angeles County Code.



Department of Regional Planning
Richard J. Bruckner, Director

320 W Temple Street
Los Angeles, CA 90012

(213) 974-6456

<http://planning.lacounty.gov>

Case Number:
RPZPE2016002500

Permit or Project Number:
CUP00-194

Zone:
A-2-2

Investigating Planner:
Timothy Stapleton

Phone Number:
(213) 974-6453

Monday - Thursday before 10am

Fees Due Now:
\$00.00

Compliance Date:
Date of Receipt

Additionally, under Condition 11, you are subject to a penalty not to exceed \$1,000 per day for violating the terms of this grant. Condition 11, in relevant part, states:

11. **Notice is given that any person violating a provision of this grant is guilty of a misdemeanor. Notice is further given that the Commission or a Hearing Officer may, after conducting a public hearing in accordance with Section 22.56.1780, et seq., of the County Code, revoke or modify this grant, if the Commission or Hearing Officer finds that these conditions have been violated or that this grant has been exercised so as to be detrimental to public health or safety, or so as to be a nuisance.**

In addition to, or in lieu of, the provisions just described, the Permittee shall be subject to a penalty for violating any provision of this grant in an amount determined by the Director of the Department not to exceed \$1,000 per day per violation.

To avoid being charged the noncompliance fee, you must comply within fifteen (15) days after the compliance date which has been set at date of receipt. To avoid being charged daily penalties described under Condition 11, you must abate the aforementioned zoning violations and bring the subject property into compliance with the Los Angeles County Zoning Ordinance within thirty (30) days from the date of this notice which is October 25, 2016.

Failure to correct the violations for **CUP 00-194** by the dates specified herein may cause this matter to be referred to the Regional Planning Commission for consideration pursuant to Condition No. 11 and/or referred to the District Attorney with the request that a criminal complaint be filed if compliance is not achieved. Conviction can result in a penalty of up to six months in jail and/or a one thousand dollar fine, each day in violation constituting a separate offense.

Any inquiry regarding this matter may be addressed to the Department of Regional Planning, 320 W. Temple Street, Los Angeles, CA 90012, Attention: Zoning Enforcement. To speak to the investigating planner directly, please note the contact information listed above. Our offices are closed on Fridays.

Sincerely,

DEPARTMENT OF REGIONAL PLANNING
Richard J. Bruckner
Director



Susana Franco-Rogan
Supervising Regional Planner
Zoning Enforcement West

Enclosures

NOTICE OF IMPOSITION OF PENALTY FEE

Los Angeles County Department of Regional Planning

Please contact the investigating planner **Timothy Stapleton**

Email: tstapleton@planning.lacounty.gov

Phone Number: (213) 974-6453 -- *Monday through Thursday before 10am*



Department of Regional Planning
Richard J. Bruckner, Director

320 W Temple Street
Los Angeles, CA 90012

(213) 974-6456

<http://planning.lacounty.gov>

May 4, 2017

BFI/ Republic Services, Inc.
ATTN: Rob Sherman
14747 San Fernando Road
Sylmar, CA 91342

RSherman@republicservices.com

RE: APPEAL OF NOTICE OF VIOLATION
14747 SAN FERNANDO ROAD, LOS ANGELES, CA 91342
Code Enforcement Case Number: RPZPE2016002500

Dear Mr. Sherman:

As you are aware, your appeal of the Notice of Violation (RPZPE2016002500) was heard before a Hearing Officer on May 2, 2017 and was **denied**. Therefore, pursuant to Condition 11 of Conditional Use Permit ("CUP") 00-194, you are required to pay the County of Los Angeles a penalty of \$1,000.00/day. The penalty, accrued from the date of the Notice of Violation, October 25, 2016, to the date when you submitted the final documents to the Department of Public Works, April 17, 2017, amounts to \$174,000.00.

Condition 11 of CUP 00-194 also requires BFI/Republic, as the permittee, to deposit \$30,000.00 to an interest bearing account from which penalty fees may be deducted. The Department of Regional Planning has deducted \$30,000.00 from this account. As set forth in Condition 11 of the CUP, the permittee is required to replenish the account to the amount of initial deposit (\$30,000.00) within 10 calendar days of the date of this notice.

Pursuant with the Hearing Officer's determination, please provide payment of the balance of the penalty, **\$144,000.00**, payable to the County of Los Angeles, to the Department of Regional Planning by 5 p.m. May 11, 2017.

Failure to timely make payment in full may result in a hold or delay of Department of Regional Planning's processing and review of your pending plans or projects.

Any inquiry regarding this matter may be addressed to the Department of Regional Planning, 320 W. Temple Street, Los Angeles, CA 90012, Attention: Zoning Enforcement. To speak directly with the investigator, **Timothy Stapleton**, please call at (213) 974-6453 Monday through Thursday before 10:00 a.m., or send an email at

Case Number:
RPZPE2016002500

Permit or Project Number:
CUP00-194

Zone:
A-2-2

Investigating Planner:
Timothy Stapleton

Phone Number:
(213) 974-6453

Monday - Thursday before 10am

Fees Due Now:
\$144,000.00

tstapleton@planning.lacounty.gov. Our offices are closed on Fridays.

Sincerely,

DEPARTMENT OF REGIONAL PLANNING

Richard J. Bruckner

Director



David Muñoz

Acting Supervising Regional Planner

Zoning Enforcement West

c. Thomas Bruen

SUNSHINE CANYON LANDFILL

May 11, 2017

Timothy Stapleton, AICP
Zoning Enforcement West
Department of Regional Planning
320 W. Temple Street
Los Angeles, CA 90012

Mr. Stapleton,

Attached please find the following two checks, as follows:

- (1) Check #7250016 in the amount of \$30,000 for the replenishment of the trust fund in accordance with Condition 11 of Conditional Use Permit 00-194-(5);
- (2) Check #7250017 in the amount of \$144,000 for the balance of the penalty as referenced in your letter dated May 4, 2017 (attached).

These checks and the payments represented by these checks are being delivered to you under protest and without waiver of Browning-Ferris Industries of California's right to seek judicial review of the Hearing Officer's tentative decision at the hearing on May 2nd, 2017, and the Department's later decision to impose the monetary penalty, regarding the Department of Regional Planning's Notice of Violation dated October 25, 2016.

We are mindful of the County's statement in your letter that the County may not process any further approvals, which are needed for continued operation of the Sunshine Canyon Landfill, unless this penalty payment is made by the deadline stated in your letter. We are making this payment under protest and will seek the return of the full penalty amount should judicial review overturn the Hearing Officer's decision and/or the Department's subsequent decision to impose the penalty.

Should the County contend that BFIC's payment of the penalty amount under protest will in any way waive or restrict BFIC's right to seek judicial review of the Hearing Officer's or Department's decisions, the Department is not to negotiate the enclosed checks but instead should return both of them to the undersigned promptly.

At the request of our counsel, I am copying County Counsel Julia Weissman and Tracy Swann on this letter.

Sincerely,



Rob Sherman
General Manager
Sunshine Canyon Landfill

cc: Julia Weissman, Esq. (via email)
Tracy Swann, Esq. (via email)

Enclosures

ATTACHMENT M

CYNTHIA A. HARDING, M.P.H.
Interim Director

JEFFREY D. GUNZENHAUSER, M.D., M.P.H.
Interim Health Officer

ANGELO J. BELLOMO, REHS, QEP
Deputy Director for Health Protection

TERRI S. WILLIAMS, REHS
Director of Environmental Health
5050 Commerce Drive
Baldwin Park, California 91706
TEL (626) 430-5374 • FAX (626) 813-3000

www.publichealth.lacounty.gov

BOARD OF SUPERVISORS

Hilda L. Solis
First District

Mark Ridley-Thomas
Second District

Sheila Kuehl
Third District

Don Knabe
Fourth District

Michael D. Antonovich
Fifth District

November 9, 2016

Republic Services, Inc.
Mr. Rob Sherman, General Manager
Sunshine Canyon Landfill
14747 San Fernando Road
Sylmar, CA 91342-1021

**SUBJECT: SUNSHINE CANYON LANDFILL ORDER TO ABATE PURSUANT TO
CONDITIONAL USE PERMIT NO. 00-194-(5).**

Dear Mr. Sherman,

The Department of Public Health (DPH) has determined that the persistent and ongoing odor problem at Sunshine Canyon Landfill (Landfill) which is associated with the transport, processing and disposal of solid waste, as well as the Landfill's gas collection system, presents a nuisance affecting the health and well-being of residents in the surrounding community. Under the authority of Condition 45N within the Conditional Use Permit, the DPH Solid Waste Management Program ("SWMP") is requiring the Landfill to implement additional corrective measures to abate the odor conditions and to protect public health.

"Nuisance" means and includes the following:

Any public nuisance known to common law or equity jurisprudence, and whatever is dangerous to human life or detrimental to health...Uncleanliness, or anything that renders air, food and drink detrimental to the health of human beings.

(Los Angeles County Code of Ordinance, Title 11- Health and Safety, Division 1, Chapter 11.02, Part 2, Article 2, Definitions, 11.02.300)

VIOLATION

From January 2016 to September 30, 2016 approximately 1100 odor complaints have been filed with the South Coast Air Quality Management District (AQMD) regarding foul odors emanating from the Landfill. As a result, to date, 22 Notices of Violation have been issued to Republic Services Inc. by AQMD.

Due to the ongoing odor complaints at the Landfill, DPH has determined that the Landfill has not taken adequate measures to sufficiently address these complaints pursuant to Condition 45N.

ABATEMENT

DPH SWMP hereby issues this Order to Abate (Order) directing Republic Services, Inc. to abate the conditions at the Landfill which have been the cause of the repeated air quality violations and persistent odors which constitute the nuisance by March 30, 2017. This shall include, but not be limited to, employing best management practices, adjusting its operations (e.g., hours, tonnage, etc.) as needed, and ensuring adequate site maintenance to reduce the emission of landfill gas and trash odors to levels consistent with other landfills of similar size and capacity adjacent to Los Angeles County. Additionally, Republic Services, Inc. is required to submit a compliance schedule to DPH SWMP by January 15, 2017, that shall include the Landfill's corrective action plan, interim milestones for correcting the conditions at the Landfill that have been the cause of the repeated air quality violations or odor emissions, and the timeline for when each mitigation effort will be implemented.

The requirements of this Order shall be read in a manner not inconsistent with orders and directives issued by AQMD, the Los Angeles County Departments of Regional Planning and Public Works, and other agencies with regulatory jurisdiction and oversight over the Landfill. Nothing herein shall be construed to exempt Republic Services Inc. from complying with all applicable laws and regulations, including orders and directives issued by any and all other regulatory agencies or limit in any way other regulatory agency's ability to impose additional requirements or mitigation measures to address the odor nuisance being created by the Landfill.

Failure to comply with this Order may result in a recommendation to DRP to issue a NOV under Condition 11 of the CUP, or result in other legal remedies.

If you have any questions regarding this Notice, please contact Maurice Pantoja, Environmental Health Services Manager at 626.430.5595 or mpantoja@ph.lacounty.gov.



Gerardo Villalobos, Chief EHS/November 9, 2016

DPH SWMP Authorized Representative/Date



BARBARA FERRER, Ph.D., M.P.H., M.Ed.
Director

JEFFREY D. GUNZENHAUSER, M.D., M.P.H.
Interim Health Officer

CYNTHIA A. HARDING, M.P.H.
Chief Deputy Director

ANGELO J. BELLOMO, REHS, QEP
Deputy Director for Health Protection

TERRI S. WILLIAMS, REHS
Director of Environmental Health

BRENDA J. LOPEZ, REHS
Assistant Director of Environmental Health

5050 Commerce Drive
Baldwin Park, California 91706
TEL (626) 430-5374 • FAX (626) 813-3000

May 9, 2017

Browning-Ferris Industries of California, Inc.
Mr. Rob Sherman, General Manager
Sunshine Canyon Landfill
14747 San Fernando Road
Sylmar, CA 91342-1021

SUBJECT: SUNSHINE CANYON LANDFILL ORDER TO ABATE – STATUS OF COMPLIANCE

Dear Mr. Sherman,

On November 9, 2016 the Department of Public Health (DPH) issued Brown-Ferris Industries of California, Inc. an Order to Abate regarding the odor problems at Sunshine Canyon Landfill. This letter will serve to notify you that the odor problems persist, despite the mitigation measures you have implemented and as of the March 30, 2017 compliance date, the number of odor complaints were not reduced to levels consistent with other landfills of similar size and capacity adjacent to Los Angeles County (see attachment). Therefore, DPH has determined the landfill is not in compliance with the Order to Abate.

If you have any questions, please contact me a 626-430-5595 or via email at mpantoja@ph.lacounty.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Maurice L. Pantoja". The signature is stylized and loops around the text.

Maurice L. Pantoja
Environmental Health Services Manager
Environmental Protection Branch

BOARD OF SUPERVISORS

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Kathryn Barger
Fifth District

ATTACHMENT N



November 29, 2016

Patti Costa
Sunshine Canyon Landfill
Republic Services, Inc.
14747 San Fernando Road
Sylmar, CA 91342

Subject: Update on Archaeological Services Performed for Chatsworth Reservoir Mitigation MND Addendum.

Dear Patti Costa,

As requested, John Minch and Associates, Inc. (JMA) is conducting an investigation to identify and document cultural resources in the proposed project area for the Chatsworth Reservoir Mitigation Project and prepare a report to satisfy requirements in compliance with the California Environmental Quality Act (CEQA). JMA staff performed the proposed archaeological services Tasks 1-3 on November 17th-18th. The tasks included: **Task 1)** a comprehensive archaeological records and literature search of a One-mile radius of the project area in order to identify known cultural resources and the potential impacts that may result from construction activities; **Task 2)** a pedestrian survey of the project area; **Task 3)** the recordation two newly discovered archaeological site locations that were located during the original 2010 field survey, and the recordation of a new site that was located during the November 2016 survey.

The results of the pedestrian survey include the identification of a new site location, and three isolated artifacts. All of the identified site locations are outside of the footprint of the mitigation area and can be avoided. However, the results of the Sacred Lands File check performed for Task 1 indicated a change in status of Sacred Lands within the Chatsworth Reservoir Mitigation Project area. The Native American Heritage Commission has informed us that the "Sacred Lands Inventory has records of sacred sites within the Chatsworth Reservoir APE". The items contained therein are confidential and exempt from the California Public Records Act pursuant to California Government Code Section 6254.10. Therefore information regarding the nature and location of these sacred sites must be obtained through direct consultation with Native Americans. Such information would then be used to assess the potential effects of the mitigation project on these sacred sites pursuant to CEQA and California Assembly Bill No. 52. In our opinion, due diligence addressing this issue would need to be exercised before a Mitigated Negative Declaration regarding cultural resources could be asserted.

JMA will continue progress on the additional two Tasks: **Task 4)** production of a comprehensive narrative report for review, and provide final revisions for the

Orange County
26623 Sierra Vista
Mission Viejo, CA 92692
Phone: 949-367-1000
www.jma-ca.com



Addendum; and as needed, **Task 5)** participation in any necessary meetings and/or conference calls during the remaining course of the project.

Respectfully submitted,

A handwritten signature in black ink that reads 'Edwin Minch'.

Edwin Minch
Managing Principal

Tribal responses to a request for Native American Consultation regarding the *Initial Study and Draft Mitigated Negative Declaration for Chatsworth Reservoir Wetland and Riparian Mitigation Program* and *Phase I Cultural Resources Survey for the Chatsworth Reservoir Wetland Riparian Restoration Project*.

Dear Dr. Corbett,

In response to the Chatsworth Reservoir Wetland and Riparian Mitigation Project. After reading the Phase I Cultural Resource Survey, I strongly feel that the disturbance to this area would affect cultural resources along with various plant communities. As documented, there are sensitive sites, the water that has pushed through at one time could have very well carried any items of significance.

Thank you for your conscious effort in supporting Cultural Resources.

Sincerely,

Eleanor Arellanes Fishburn
Barbareno/Ventureno Band of Mission Indians
PO Box 5687
Ventura, CA 93005

Notes from phone conversation with Mr. Anthony Morales, Chairperson,
Gabrielino/Tongva San Gabriel Band of Mission Indians.

The fact that there was a reservoir there indicates there was water and this means there would be villages in the area, so we consider this to be important to our tribe and we, (the Gabrielino/Tongva San Gabriel Band of Mission Indians) want to be involved with any monitoring regarding this project.

Dr. Corbett,

The SYBCI Elders will not be getting involved in this project, but would like to make some comments about the protection and preservation of cultural resources;

1. They agree that additional survey and studies need to take place in and around the area are in order to better categorize the sites that do exist within the APE;
2. The survey plan for this project needs to be completed in consultation with tribes and agreed to by those involved;
3. Native American advisor/consultant need to be present during the surveys, as well as during any ground disturbing activities;

4. A plan needs to be created for long term preservation, in consultation with tribes. because once completed, this will more than likely become a refuge for wildlife and with that comes folks that interested in nature, i.e. bird watching, walking, plant viewing, etc.;

5. If at all possible, it would be nice to have available for tribes to possibly gather in the area plants that they would traditionally use.

These would be the comments and suggestions for this area. If there is no response from any of tribes, please advise and I will inform the Elders to see if they may want me to participate based on non-involvement by the tribes.

I look forward to hearing from you.

Freddie Romero
Cultural Resources Coordinator
SYBCI Elders Council
805-688-7997 X4109
805-403-2873

Notes from phone conversation with Mr. Robert Dorame, Chairperson, Gabrielino Tongva Indians of California Tribal Council. In the course of our phone conversation he said that he believed that the area was “highly sensitive” and that any ground disturbing activity be monitored by Native Americans. He went on to say that the monitoring should be rotated among Tribes. He informed me that he would not submit written comments (because of his busy schedule), but that he wanted what he conveyed to me by phone to serve as his Tribe’s comments.

Dear Dr. Corbett,

Thank you for contacting the Gabrielino Tongva Nation for the purpose of Native American consultation regarding the Chatsworth Reservoir Project. The project area lies within the traditional tribal territory of the Gabrielino Tongva Nation and the following comments are intended to express the concerns of our Tribe.

After review of the material provided by your office I am of the opinion that further archaeological investigation is needed to properly assess the recent discovery of the archaeological sites found within the project area by JMA during their site survey. I believe archaeological data recovery is warranted given the history of the project area.

As the project area is within our tribal territory the Gabrielino Tongva Nation is culturally affiliated to any prehistoric cultural items that may be discovered during new archaeological testing as well as any archaeological items already recorded within the project area and its vicinity.

The Gabrielino Tongva Nation also requests that a Native American monitor from our tribal group be present during all phases of archaeological testing and future subsurface construction activity associated with the Chatsworth Reservoir project. The Native American monitor will be a documented tribal member of the Gabrielino Tongva Nation.

I hope that my comments and concerns are helpful to this consultation process. Please feel free to contact me as this project moves forward.

Sincerely,

Sam Dunlap
Cultural Resource Director
Gabrielino Tongva Nation
909-262-9351 cell

Attn: Dr. Corbett, JMA

Thank you for providing the Torres Martinez Desert Cahuilla Indians with the notifications of your projects. However after having reviewed the information you have been providing and the locations of your projects it is apparent that you are out of our traditional use area. Therefore we wish to defer projects to other tribes closer to the area.

Respectfully,
Michael Miralez
Cultural Resource Coordinator
Torres-Martinez DCI
Office: 760-397-0300 Ext: 1213
Email: mmiralez@tmdci.org

The Gabrielino Band of Mission Indians – Kizh Nation communicated through a phone conversation that they wanted subsurface testing of the archaeological sites within the APE and that all ground disturbing activity be monitored by a Native American representative. Furthermore, by email the Tribe provided the following:

“The Chatsworth Reservoir area is definitely in Kizh Tribal Territory. Bernice Johnston (1962) identifies the Chatsworth area as in Gabrielino (Kizh) territory and states as to its sensitivity:

“Many a modern community in the San Fernando Valley can boast of an Indian predecessor. From Tujunga to Chatsworth archeological sites (i.e. village sites) abound. . .”(Johnston 1962:125).

McCawley (1996) also includes the Chatsworth area as Gabrielino (Kizh) territory and specifically about Chatsworth Reservoir:

“Melendrez (Kizh informant) reported to Harrington that a rancheria, or Indian community, existed near Chatsworth Reservoir. 'Melendrez v'd [volunteered]. . . that one long rancheria extended from where we were [probably northwest of Chatsworth Reservoir] a couple of miles to the

Triunfo ward [southwestward] of where we were and that fragments of shell, etc., are picked up in this whole stretch.' According to Harrington, Melendrez implied that 'the name of that rancheria was El Escorpion de las Salinas' . . .”

Respectfully submitted,

A handwritten signature in cursive script that reads "Ray Corbett". The signature is written in black ink and is positioned above the typed name and title.

Ray Corbett, Ph.D., RPA
Principal Archaeologist
JMA
April 28, 2017

ATTACHMENT O



GAIL FARBER, Director

COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

900 SOUTH FREMONT AVENUE
ALHAMBRA, CALIFORNIA 91803-1331
Telephone: (626) 458-5100
<http://dpw.lacounty.gov>

ADDRESS ALL CORRESPONDENCE TO:
P.O. BOX 1460
ALHAMBRA, CALIFORNIA 91802-1460

IN REPLY PLEASE

REFER TO FILE: **EP-5**

May 4, 2016

Mr. Rob Sherman, General Manager
Republic Services, Inc.
Sunshine Canyon Landfill
14747 San Fernando Road
Sylmar, CA 91342-1021

**SUNSHINE CANYON CITY/COUNTY LANDFILL
CONDITIONAL USE PERMIT NO. 00-194-(5)
AUTHORIZATION TO IMPORT CLEAN DIRT FROM THE LOS ANGELES COUNTY
FLOOD CONTROL DISTRICT**

Dear Mr. Sherman:

We have reviewed your request dated July 28, 2015, and subsequent revision dated October 9, 2015, to import clean dirt from the Los Angeles County Flood Control District (District), beginning on April 2017, and ending on December 2021. Your request for importation of clean dirt for beneficial use at the Sunshine Canyon Landfill is hereby approved pursuant to Conditional Use Permit 00-194-(5), Conditions 1.D and 23.E, which requires Republic Services to obtain prior authorization from the Department of Public Works prior to importation and acceptance of clean dirt material for beneficial use and disposal at the site.

This authorization is being granted in order to allow the landfill to import soil for the site's daily and intermediate soil cover needs and other beneficial uses. Based on your submittal, the volume of on-site soil stockpile will be exhausted by October 2019 and importation of soil is necessary for effective landfilling operations at the site. This approval is subject to the following conditions:

1. The quantity of soil to be imported shall not exceed the following:
 - 2,200 tons per day average or 13,200 tons per week and
 - 2.5 million tons total for a 5-year duration of the project

Mr. Rob Sherman, General Manager

May 4, 2016

Page 2

2. The quantity of soil imported (tonnage) shall be included in the total permitted weekly tonnage capacity of materials (Solid Waste, Inert Debris and Beneficial Use Materials), which is limited to 72,600 tons per week. Pursuant to the CUP, in no event shall the daily tonnage of all materials received by the Landfill exceed 12,100 tons on any given day, six working days per week.
3. Limited only to Clean Dirt and sediments from the District
4. The soil importation schedule shall be from Monday to Friday, between the hours of 7:00 am to 6:00 pm.
5. The imported soil shall only be used for on-site daily and intermediate soil cover needs and other beneficial uses at the site.
6. All incoming and departing truck routes associated with this soil importation project shall be limited to Roxford Street, Sepulveda Boulevard and San Fernando Road.
7. The imported soil shall be placed adjacent to the working face area for immediate usage in a designated location, or, if soil is not needed at the working face, it will be taken to a designated stockpile location as defined in the Joint Technical Document. Additionally, all stockpile areas shall be vegetated if left unused longer than 180 days.
8. The operator shall comply with the currently approved Fugitive Dust Control Program to minimize dust resulting from the importation project
9. The operator shall follow the approved Waste Load Checking Program and the Waste Discharge Requirements issued by the California Regional Water Quality Control Board to ensure the imported soil's quality is acceptable under this program and permit.
10. Republic shall keep records of all materials received from the District including quantities accepted, stockpiled, beneficially used, and disposed of.

Mr. Rob Sherman, General Manager

May 4, 2016

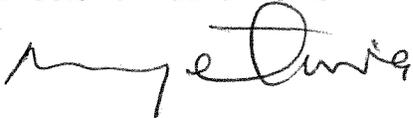
Page 3

11. The operator shall submit a monthly summary of these records on an annual basis, including a stockpile location map, to Public Works' Environmental Programs Division at the end of each calendar year for the duration of this project.
12. The Director of Public Works, at his/her sole discretion may rescind or terminate this approval if the Department determines that any of the conditions of approval has been violated and/or that such termination is necessary to protect public health, safety, welfare, and/or the environment.

If you have any questions, please contact me at (626) 458-3553, Monday to Thursday, 7:00 a.m. to 5:30 p.m.

Very truly yours,

GAIL FARBER
Director of Public Works



MARTIN AIYETIWA
Senior Civil Engineer
Environmental Programs Division

DN:jl

P:\Sec\Sunshine Canyon Landfill Importation of Soil from FCD

cc: Sunshine Canyon Landfill Local Enforcement Agency (Gerry Villalobos, David Thompson)
Department of Regional Planning (Maria Masis, Tim Stapleton)
Department of Public Health (Gerry Villalobos)
City of Los Angeles Department of City Planning (Nicholas Hendricks, Ly Lam)
Sunshine Canyon Landfill Technical Advisory Committee (Lisa Webber, Jon Sanabria)
Sunshine Canyon Landfill Community Advisory Committee (Wayde Hunter, Gale Gunderson, Joe Vitti)
Members of the Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force
County of Los Angeles Public Works, Water Resources Division (Chris Stone, Ken Zimmer)