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***Impacts determined not to be significant are addressed in this EIR under **Section VII, Impacts Determined to be Insignificant**, and have been omitted from the Impact Section of this report.

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IV.R SAFETY

INTRODUCTION

This section provides an overview of the existing conditions for Mission Canyon 8 Landfill located within the project site. It also discusses the potential for the landfill to impact the proposed residential uses and the potential impacts of the project on the landfill. These discussions are based on the history and status of the Mission Canyon 8 Landfill provided by Geomatrix, an environmental consulting firm retained by Castle & Cooke to implement the Landfill's post-closure maintenance.

MISSION CANYON 8 LANDFILL

Environmental Setting

Site Description

Mission Canyon 8 Landfill is an undeveloped site of approximately 50 acres in the Mountaingate project site area that was used as a municipal landfill from July 1978 to January 1982. The site presently consists of terraced slopes that are covered with vegetation. Located north of Mission Canyon 8 is the existing Mountaingate Country Club Golf Course. The areas proposed for development are located west of the Mission Canyon 8 Landfill. Sepulveda Boulevard runs north/south on the east side and undeveloped land lies south of the Canyon. Beyond the immediate vicinity, other land uses in the area include residential development to the north that constitutes the existing Mountaingate residential community, Mount St. Mary's College, a Metropolitan Water District water storage and transmission facility, the Getty Museum to the south, and the I-405 (San Diego Freeway) and Sepulveda Canyon to the east.

Barclay Hollander acquired the landfill site in the 1960's. In 1978, Barclay Hollander leased Mission Canyon 8 Landfill to the County Sanitation Districts for use as a municipal landfill. Castle & Cooke Mountaingate, Inc. (C & C) acquired the rights to the site from Barclay Hollander in 1996.

Site History

The County Sanitation Districts operated the landfill from 1978 to 1982, during which time approximately 5 million tons of municipal solid waste was disposed at the site. The landfill was

operated under permits issued by the Los Angeles Regional Water Quality Control Board (LARWQCB) and other agencies. The LARWQCB permit limited the County Sanitation Districts to disposing ordinary residential and commercial refuse and/or rubbish, other decomposable organic refuse, and scrap metal. This permit prohibited the landfill from accepting hazardous wastes, liquids, oils, waxes, tars, soaps, solvents, salts, borax, lye, caustics, acids, sewage sludge, or toxics such as insecticides, poison, or radioactive materials. From March 1981 until the site closed in January 1982, a full time inspector examined loads to identify any potentially hazardous materials.

The landfill was closed by the County Sanitation Districts in January 1982. The closure was consistent with the Site Closure and Maintenance Report, which was approved by the LARWQCB. The closure requirements included the addition of a minimum three feet of compacted soil cover and post-closure monitoring. The landfill was landscaped with vegetation, and surface drainage was provided with a center concrete drain, which flows to a storm drain beneath Sepulveda Boulevard. The landfill was required to install an extensive landfill gas monitoring system to monitor for the presence of landfill gas at the perimeter of the landfill to evaluate whether landfill gas is migrating from landfill. The landfill also has a gas collection system that collects landfill gas, formed from the decomposition of organic matter in a landfill, for use as an alternative energy source.

The site is presently subject to post-closure maintenance and monitoring, with government oversight provided by the City of Los Angeles Department of Environmental Affairs (DEA), LARWQCB, and the South Coast Air Quality Management District (SCAQMD). The County Sanitation Districts were originally responsible for the maintenance and monitoring. However, because of concerns regarding the adequacy of maintenance and monitoring, Barclay Hollander filed a lawsuit against the County Sanitation Districts. The settlement agreement provided that Barclay Hollander would be responsible for future maintenance and monitoring, and this program has been in effect since 1990.

In 1981, Barclay Hollander entered into an agreement with Getty Synthetic Fuels (GSF) for the commercial recovery of landfill gas. In 1984, GSF began to collect and transport landfill gas for off-site use. Waste Extraction Technology (WET) acquired the rights to the landfill gas use from GSF during 2000. WET was responsible for maintaining and monitoring the landfill gas collection system and the gas processing facility. However, since January 2003, they no longer manage the landfill. Castle & Cooke are planning to retain another operator to resume collection and transport to UCLA. Until such time, landfill gas is flared off.

Regulatory Status

Present Regulatory Status

Closed landfills undergo substantial, natural settlement due to compaction and decomposition of organic matter. Significantly, settlement decreases over time. The settling can cause cracks in the surface of the landfill that can emit landfill gas and allow runoff or stormwater to pass through the landfill. All landfills are subject to government agency oversight and post-closure monitoring to avoid these problems.

Three regulatory agencies are primarily responsible for overseeing landfill maintenance and monitoring. First, the LARWQCB is responsible for administering regulatory programs to protect surface water and groundwater, including the landfill maintenance and monitoring that is required under the permit issued to the landfill by the LARWQCB. The LARWQCB is also the agency that oversees compliance with the stormwater permit. Second, the City DEA is the Local Enforcement Agency for the California Integrated Waste Management Board (CIWMB), which oversees compliance with applicable state regulations governing public health, safety, and the environment as it relates to landfills, including closed landfills. Third, the South Coast Air Quality Management District (SCAQMD) has oversight for compliance with applicable regulations on air emissions. The landfill is subject to SCAQMD Rule 1150.1, which has detailed requirements for monitoring landfill gas emissions and, if necessary, implementing corrective actions.

Until the late 1980's, post-closure maintenance had been performed by the County Sanitation Districts consistent with the Site Closure and Maintenance Report, which was approved on March 29, 1982, by the LARWQCB. On May 31, 1989, in response to complaints from a nearby homeowner's association, the LARWQCB conducted an investigation and concluded that the on-going maintenance at that time was not sufficient and issued a Cleanup and Abatement Order to address identified surface cracks, ponding and landfill gas odor problems. At that time, Barclay Hollander was negotiating with the County Sanitation Districts to assume management of the landfill and was working out details with the LARWQCB. On July 24, 1989, Barclay Hollander submitted a Proposed Post-Closure Maintenance Plan to comprehensively address issues relating to landfill maintenance. The site was also regraded and additional drains were installed. On September 19, 1989, the LARWQCB accepted the Plan and stated that the Plan fulfilled the requirements of the Order.

The Post-Closure Maintenance Plan includes the following:

- Regularly monitor the landfill surface for any cracks, ponded water, erosion, obstruction in drainage and stressed vegetation; recommend appropriate corrective action and document that such action is implemented.
- Maintain the site's landscaping, including trimming or clearing of brush and trees, and fertilizing and replanting.
- Inspect weekly the irrigation at Mission Canyon 8 to check for breaks or leaks in the system and to make any necessary repairs.
- Monitor the drainage structures and keep them in good repair and free of debris.
- Perform monthly gas monitoring.

Environmental Impact Analysis

Threshold of Significance

The L.A. CEQA *Thresholds Guide* indicates that the determination of significance shall be made on a case-by-case basis, considering the following factors:[1]

- The regulatory framework for the health hazard;
- The probable frequency and severity of consequences to people from exposure to the health hazard; and
- The degree to which project design would reduce the frequency of exposure or severity of consequences of exposure to the health hazard.

Project Impacts

Los Angeles Regional Water Quality Control Board (LARWQCB)

Landfill Maintenance and Monitoring

Barclay Hollander, and now Castle & Cooke, have monitored the landfill and implemented corrective action as needed. Through its consultants, Castle & Cooke regularly inspects the landfill, monitors the surface and perimeter gas probes for landfill gas emissions, and maintains the vegetation. As necessary, Castle & Cooke repairs cracks to reduce landfill gas emissions, re-grades the surface to assure proper

1 L.A. CEQA *Thresholds Guide*, City of Los Angeles, Environmental Affairs Department, May 14, 1998, pp. H.2-3 and H.2-4.

drainage, and initiates corrective action on the gas collection, including repairing existing wells and installing additional wells.

Since Barclay Hollander and Castle & Cooke have maintained the landfill, there have been no reports of odors from the landfill or compliance concerns.

The landfill surface is inspected monthly, as well as immediately following unusual occurrences (e.g., heavy rainstorms or earthquakes), which have the potential to affect the landfill's integrity. If any repairs are needed, a construction company is promptly contacted to undertake filling the crack or fissure and appropriate documentation is made. In addition, a landscaper is regularly on site to maintain the vegetation, including cutting and clearing of vegetation and replanting as necessary. As expected, the landfill continues to experience gradual settlement. Soils engineers conduct periodic inspections and initiate any necessary repairs to the landfill cover. Annually, before the rainy season, the various drainage benches and facilities are cleared of debris and re-graded as needed.

The City DEA also regularly inspects the landfill. Any areas of concern are noted on the inspection report. These notes have typically addressed routine maintenance issues such as broken water lines, ponded water, and mosquito larvae in ponded water. Subsequent inspection reports have noted that these areas have been satisfactory corrected. No citations have been noted in the inspection reports. Therefore, no significant impacts are anticipated with regard to maintenance and monitoring of the landfill.

Solid Waste Assessment Test (SWAT)

In August 1987, the County Sanitation Districts and Barclay Hollander submitted to the LARWQCB a Solid Waste Assessment Test (SWAT) report for Mission Canyon 8 Landfill. The County Sanitation Districts issued a Final Solid Waste Assessment Test Update Report dated September 1989. The SWAT report assesses potential impacts to groundwater. The SWAT test reported that samples from the downgradient wells indicated that the groundwater has been marginally impacted by landfill gas based on the detection of very low levels of volatile organic compounds (VOCs) such as 1,1-dichloroethane, TCE, PCE, chlorobenzene, benzene and toluene in the groundwater. In addition, a small surface seep was observed in the front face of the landfill. However, in a letter dated May 10, 1990, the LARWQCB stated that groundwater at the site had been impacted by landfill gas, but that the landfill was not leaking leachate.

On July 30, 1990, Barclay Hollander submitted a SWAT Assessment and Mitigation Plan that reported that the surface cover was in good repair and that additional landfill gas recovery wells would be installed. In June 1992, a second expansion of the landfill gas collection system began operation. Up until January 2003, GSF maintained the gas collection system. GSF submitted to the SCAQMD a SWAT report prepared on August 5, 1998. Based on the report, the SCAQMD has not required any further controls on landfill emissions. With continued future compliance, no significant impacts would occur. Since January 2003, Castle & Cooke have managed the landfill gas system and are planning on retaining another operator to resume the gas collection and transportation services to UCLA.

Stormwater

The site is subject to the state stormwater permit program. The landfill has prepared a stormwater pollution prevention plan and is implementing its provisions. The landfill submits an annual report to the LARWQCB. With the continued implementation of this plan, potential impacts to the proposed residential uses would be less than significant.

Los Angeles Department of Environmental Affairs (LADEA)

The LADEA regularly inspects the landfill. Any areas of concern are noted on the inspection report. These notes have typically addressed routine maintenance issues such as broken water lines, ponded water, and mosquito larvae in ponded water. Subsequent inspection reports have noted that these areas have been satisfactory corrected. No citations have been noted in the inspection reports.

The LADEA noted runoff from the landfill in 2000 and requested that Castle & Cooke investigate the source of the runoff and submit a study on this condition. This study was completed as requested and submitted to LADEA in March 2001. No corrective actions have been requested by the LADEA in response to this study.

Therefore, no significant impacts are anticipated with regard to maintenance and monitoring of the landfill.

South Coast Air Quality Management District (SCAQMD)

The South Coast Air Quality Management District (SCAQMD) regulates landfills with respect to air emissions. Castle & Cooke is subject to a SCAQMD permit for the landfill gas recovery system and is responsible for compliance with operation of that system. Additionally, Castle & Cooke is also subject

to the SCAQMD Rule 1150.1 Compliance Plan. Rule 1150.1 has detailed management requirements, including monthly monitoring the surface for landfill gas, semi-annual monitoring for comprehensive monitoring of air toxins and implementing corrective action if regulatory thresholds are exceeded. To date, the SCAQMD is satisfied with the management of the landfill. Based on this information, potential impact resulting from landfill gas emissions are considered to be insignificant.

Issues Previously Raised in 1989

In the late 1980s, nearby residents who opposed a proposed development of neighboring property asserted that hazardous wastes may have been disposed at Mission Canyon 8. These allegations were evaluated by EMCON, an environmental consulting firm hired by the City of Los Angeles Planning Department, and by Erler & Kalinowski, an environmental consulting firm hired by the landowner. Both firms independently concluded that: (1) there was no evidence of systematic disposal of hazardous wastes, as had been asserted previously; and (2) there is no reasonable basis for concern for public health or the environment.

EMCON further reported that the County Sanitation Districts examined incoming loads to Mission Canyon 8 in the early 1980s. In their reports, the Districts concluded that 92 percent of all used containers of potentially hazardous material were empty. EMCON also stated that until the formal load checking program was implemented in 1981, equipment operators checked for drums concealed in loads. The large containers, usually 55-gallon drums, were readily detected by the equipment operators. Site personnel were confident that drums rarely escaped detection. EMCON reported that even if some hazardous wastes had been disposed of in small containers, this disposal would only be of concern if there were evidence of a release of such hazardous wastes to the environment. No specific evidence of such disposal has been found and, as such, there are no significant impacts associated with disposal of hazardous waste material.

Concerns with respect to toxic air emissions and potential threat of fire have also previously been raised. Both Erler & Kalinowski and EMCON, on behalf of the owner and the City, respectively, investigated these concerns. Both experts concluded that ambient air quality conditions resulting from Mission Canyon 8 Landfill were comparable to ambient air at other municipal landfills and comparable to background levels in other parts of Los Angeles. Both experts concluded that Mission Canyon 8 does not pose an added threat to public health or safety. There have been no odor complaints relating to Mission Canyon 8 Landfill since 1990. As such, there are no significant impacts associated with the threat to public health and safety. As discussed above, the landfill also complies with SCAQMD Rule 11501.1.

Conclusion

As demonstrated, the landfill is monitored on a regular basis under the authority of regulatory agencies. Since early 1990, Barclay Hollander has provided comprehensive management of the landfill including erosion control, cap maintenance, vegetation, irrigation control, perimeter gas monitoring, and groundwater monitoring. There are no records of citations or complaints since implementation of the Post-Closure Maintenance Plan by Barclay Hollander in 1990, and thus, the landfill does not pose any threat to public health and safety.

Potential Impacts to Landfill

The proposed project will result in two minor alterations to the existing landfill. First, the existing maintenance road over the landfill will be improved to serve as a secondary fire road and emergency access road. The improvements will consist of grading along portions of this existing road to create a minimum width of 20 feet and a grade of no more than 15 percent. Additionally, the road will be paved with asphalt to provide a suitable all-weather surface. A gabion (rock) retaining wall, approximately 400 feet in length, will be required in one location on the lower portion of the road.

The project would also involve the placement of earth materials excavated from the Stoney Hill ridge to a fill location on the northern edge of the landfill. The proposed fill site consists of 12.7 acres located south of the development planned along Stoney Hill Road and west of the existing maintenance road. This fill site is relatively flat with the elevation ranging from 1450 feet on the east to 1500 feet on the west. The fill site includes a slope on the south that drops to an elevation of approximately 1400 feet. Up to 50,000 cubic yards of cut earth material may be deposited on the northern edge of the landfill. This material would be used to fill fissures in the landfill cover material and for other maintenance activities associated with the landfill as required by the existing landfill closure plan. The placement of fill on the landfill would be consistent with all guidelines in the closure plan and would not result in a significant impact.

The improvement of the existing road and the proposed fill may require modifications to the existing landfill gas collection system and drainage systems. These existing facilities may have to be relocated and reconstructed. Any such modifications will be subject to the review and approval of the agencies with jurisdiction over the maintenance of the landfill.

Cumulative Impacts

As human-made hazards are a site-specific issue in this case, no impacts would occur related to cumulative development.

Mitigation Measures

1. Any modifications to the existing landfill gas collection and drainage systems shall be subject to any required review and approval by the Los Angeles Regional Water Quality Control Board, City of Los Angeles Department of Environmental Affairs and South Coast Air Quality Management District.

Adverse Impacts

As no significant impacts would occur, no adverse impacts expected.