

SUNSHINE CANYON LANDFILL

December 21, 2017

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Subject: Report to the Joint Sunshine Canyon Landfill Technical Advisory Committee
SCL TAC Meeting Date - January 17, 2018

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 January 17, 2018.

1.0 Cell Development

1.1 Cell CC-4, Part 2

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 2 was received from the Los Angeles Regional Water Quality Control Board (LARWQCB) on October 23, 2017 (Attachment A), and disposal operations in this cell commenced on October 25, 2017. CC-4, Part 1, is an 6.2-acre cell that will provide 10.76 million cubic yards of disposal capacity.

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 were conducted in Cell CC-3A, Part 2, Cell CC-3B, areas on the County deck, as well as in Cell CC-4 Part 1

where fill operations commenced on March 24, 2017. The majority of disposal operations were conducted in Cell CC-4 Part 1 from April until October 25th when disposal operations commenced in CC-4 Part 2. Disposal operations were only conducted in CC-4 Parts 1 and 2 from October through the end of the year.

2.2 Soil Usage

Based on soil usage logs, approximately 21% 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 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 were completed in 2017:

- Installation of 153 new or replacement vertical gas extraction wells;
- Drilling activities for the installation of 153 new and replacement wells commenced in January 2017 and were completed at the end of May 2017;
- Installation of dewatering pumps in gas wells affected by liquids;
 - 253 dewatering pumps were installed in vertical gas extraction wells impacted by liquids in 2017;
 - 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;
 - Installation of Flare 11;
 - Construction of Flare 11 (a 5,000 scfm ultra-low emission flare) was completed on October 31, 2017 and the flare was put into service on November 13, 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.

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

Surface emission monitoring (SEM) is conducted in accordance with SCAQMD Rule 1150.1 requirements. It should be noted that SEM monitoring is conducted on a monthly basis rather than quarterly as required by Rule 1150.1 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 1.15 acres. A summary of the results of the instantaneous and integrated SEM conducted for the second and third quarters of 2017 is as follows:

Second Quarter 2017 SEM Results

- Instantaneous SEM monitoring: During the initial monitoring event, the City side of the landfill had 149 locations over total of 656 grids monitored showing surface emissions over 500 ppm Total Organic Carbon (TOC); the County side of the landfill had 94 locations over a total of 456 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: During the initial monitoring event, the City side of the landfill had 56 grids out of a total of 656 grids monitored that showed results over 25 ppm TOC. The County side of the landfill had 22 grids out of a total of 456 grids that showed results over 25 ppm TOC. The grids were

repaired and re-monitored in accordance with Rule 1150.1. All of the grids passed either the first or second 10-day re-check as allowed by Rule 1150.1

Third Quarter 2017

- Instantaneous SEM monitoring: During the initial monitoring event, the City side of the landfill had 63 locations over total of 630 grids monitored showing surface emissions over 500 ppm Total Organic Carbon (TOC); the County side of the landfill had 55 locations over a total of 422 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: During the initial monitoring event, the City side of the landfill had 26 grids out of a total of 630 grids monitored that showed results over 25 ppm TOC. The County side of the landfill had 11 grids out of a total of 422 grids that showed results over 25 ppm TOC. The grids were repaired and re-monitored in accordance with Rule 1150.1. The majority of grids passed either the first or second 10-day re-check as allowed by Rule 1150.1, with the exception of Grids M17 and M19 in August 2017. A horizontal collector was installed in these grids to provide additional gas collection; subsequently, the integrated SEM results for these two grids were reported below the 25 ppm threshold during the 45-day remonitoring event.

3.2 Perimeter Probe Monitoring

Rule 1150.1 monitoring requires monthly monitoring of the site's perimeter probes. During the August monitoring, probe P-207A registered a reading of 59.1% methane (%CH₄). It was determined a vacuum line that serves a perimeter collector gas well in close proximity to P-207, malfunctioned. The vacuum line was repaired, and subsequent monitoring of P-207 showed a reading of 0.0% (Attachment C).

4.0 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.

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 LARWQCB on a semiannual and annual basis.

5.1 Summary of Results of First Semi-Annual Groundwater Monitoring Period of 2017

During the first semiannual 2017 monitoring period, environmental monitoring was conducted on a quarterly basis during March (first quarter) and June (second quarter). The results were generally similar to past monitoring event results, as most analyte/well pairs were previously in tracking mode.

During the first semiannual 2017 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 either to the water treatment system prior to reuse or discharge directly to the sewer.

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 first and second quarter monitoring period therefore this location could not be sampled.

6.0 Leachate Collection and Treatment System (City/County)

By letter dated October 18, 2017, a new industrial wastewater permit was issued by the City of Los Angeles Bureau of Sanitation (Attachment D). Permit W-535428 is in effect until August 31, 2020.

A Revised Fact Sheet was prepared and submitted to the City to support the industrial wastewater application; this Fact Sheet is also included in Attachment D. The fact sheet provides a description of the liquids generated at the facility as well as the site liquids management plan (provided as Figure 2 in the Fact Sheet) and other supporting documentation. As shown on Figure 2, liquids generated at the facility include, leachate, gas well liquids, condensate, seep water, subdrain and cut-off wall water. The major components of the site's liquid management plan include:

- Direct discharge of all site liquids including leachate, gas well liquids and condensate to the sewer with chlorination as needed;
- Optional on-site treatment of seep, subdrain and cut-off wall water after which the effluent can be used on-site for dust control

Figure 3 in the Fact Sheet provides the process flow schematic for the optional on-site water reuse treatment system. This treatment system (formerly call the LTF treatment system in prior TAC reports) has not changed operationally. As shown on Figure 3, the treatment system consists of filters and granular activated carbon (GAC) vessels 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.

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 and was completed in the third quarter of 2017. 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. As required by the Action Plan presented to, and approved by the South Coast Air Quality Management District (please refer to Section 8.2), 250 pumps were installed in gas wells impacted by liquids. The installation of these pumps was completed by August 31, 2017. 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.

Additional improvements to the site's liquid management system are currently underway and are scheduled for completion during the first quarter of 2018. These improvements include the installation of additional, dual-wall piping, installation of a dedicated composite sampling system with associated pH and flow meters for sewer discharges, installation of booster pumps, installation of a chlorine injection system, additional cleanouts and manholes, and grit chamber.

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 E.

7.1.1 Permanent Perimeter Drainage System

The perimeter drainage systems are 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.
- The 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 F). Comments on the West Drainage Channel Master Plan were received from DPW on June 15, 2016 (Attachment F). Since the construction of the West Perimeter Drainage Channel cannot be implemented until the CC4 Stability Buttress is in place, no action has been taken to date to address the comments from DPW. As soon as the CC4 Stability Buttress 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, CC-4 Parts 1 and 2 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 alongs 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;
- Removal of sediment that accumulated around the 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;

Temporary erosion and sediment control measures are documented and reported to the LEA, the Los Angeles Regional Water Quality Control Board and the County of Los Angeles, Department of Public Works. The Wet Weather Preparedness Plan submitted to these agencies is included in Attachment G. After each rain event, erosion and sediment control measures are inspected and evaluated, and repairs made as needed prior to the next rain event.

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

Aggressive odor control measures are being implemented at the site. By letter dated November 29, 2017, a response to DPW was submitted which included a Revised Odor Mitigation Measures and Interim Milestones table providing the status of the odor mitigation measures being conducted at the site. This table is included in Attachment H and includes all of the work that has been completed in 2017, the on-going operations and maintenance management (OM&M) activities being conducted for the gas collection and control system (GCCS), and other activities being conducted solely for the purpose of identifying odorous sources, potential odorous sources and remediating those sources.

The combined benefit of all of the odor mitigation measures completed at Sunshine Canyon Landfill as well as the on-going processes and procedures to address and mitigate odors and potential odor sources has resulted in the following quantifiable benefits:

- (1) *Reduction of Odor Complaints Called in to SCAQMD: Please refer to Figure 1 included in Attachment I which presents a graph showing the May – October 2014 – 2016 monthly average of odor complaints called in to SCAQMD compared to the monthly odor complaints for May – October 2017. This graph illustrates the significant reduction in the number of odor complaints.*
- (2) *Reduction in Notices of Violation for Odor Nuisance: A Notice of Violation (NOV) for odor nuisance has not been issued by SCAQMD to Sunshine Canyon Landfill since April 5, 2017.*
- (3) *Increased Gas Collection: Please refer to Figure 2 included in Attachment I which illustrates the increase in gas flow in correlation with the implementation and completion of the Action Plan components. This figure also illustrates the number of odor complaints called in to SCAQMD. This figure also demonstrates, the significant positive impact of the implementation and completion of the Action Plan components.*

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. A contractor was hired by SCAQMD and the independent third party monitoring at and near Van Gogh Charter School is currently being performed. Republic Services personnel have not had any interaction with the independent third party monitors nor has SCAQMD provided any information regarding the observations and/or findings of the monitor as of the date of this report.

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: Status reports for the Food Waste and Organics Diversion Program for the second and third quarters of 2017 were submitted to SCAQMD on July 12, 2017 and October 16, 2017, respectively. Key components of the reports include:

(1) Food Recovery – Food Finders

In Q2, the following activities were conducted:

- The refrigerated truck began recovery pickup services;
- Marketing strategies were devised;
- Outreach to 120 customers was conducted, 390 calls were placed and 73 meetings held. Outreach activity was logged through Salesforces, a customer relationship management software and a customer outreach spreadsheet was developed to compile growing list of food waste generators, estimates of recoverable or compostable volumes and data for existing diversion programs.

In Q3, the following activities were conducted:

- The outreach process continued by engaging new and current prospects for food recycling and additional marketing outreach efforts including exhibiting at the Western Food Expo in August 2017;

- The refrigerated truck services continued.

(2) Transfer Station Transload

- During 2Q2107, 488 tons of organic waste was diverted from Sunshine Canyon Landfill through the program implemented at Innovation Transfer Station (Innovative);
- During 3Q2017, 490 tons of organic waste was diverted from Sunshine Canyon Landfill through the program at Innovation.
- A total of 1,384 tons of organic waste has been diverted since the program implementation.

(3) Agromin OC Chino Organics Recycling

This condition required a Covered Aerated Static Pile (CASP) system to compost up to 75 tons per week of food waste be permitted, constructed and begin operating by March 30, 2019.

- The permit application was submitted to SCAQMD on February, 7, 2017;
- Permit approval was received on July 7, 2017;
- The CASP equipment was ordered on July 12, 2017. Equipment was received starting in mid August;
- The CASP system is scheduled to go online in late December of this year.

(4) American Waste Transfer Station Organics Pre-Processing

This condition required an organics pre-processing system capable of pre-processing up to 250 tons per day of food waste be installed at the American Waste Transfer Station.

- During the 3rd and 4th quarters of 2017, scoping and design for the enclosure of the American Waste Transfer Station in accordance with Rule 401 commenced;
- Applications and requests for approval were submitted to the City of Gardena for the building permit on

November 30, 2017, and to the SCAQMD on December 1 2017 for the organics processing system and air control systems.

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 J). The Los Angeles County Department of Public Works (DPW) initially approved the continuation of the pilot study to March 27, 2017 (Attachment J). 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 J). 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 J).

The second year of the ADC pilot project concluding in mid-October 2017. A report summarizing the results of the project was submitted to the LEA and DPW on October 11, 2017, and October 25, 2017, respectively. Based on the observations and findings presented in report, it was concluded that the ADC is more effective than the nine inches of compacted soil cover and recommends the continued use of the ADC at Sunshine Canyon Landfill.

By letter dated October 16, 2017, the LEA acknowledged the receipt of the ADC report presenting the findings of the second year of the pilot project (Attachment J). The LEA further stated they were conducting an independent evaluation of the ADC pilot project based on SCL LEA observations, landfill gas monitoring results as well as the information presented in the Republic Services report. The LEA approved the continued use of the ADC during their evaluation.

By letter dated December 20, 2017, the LEA, provided their review of the ADC Pilot Project Report as well as presented the findings of their independent review of the ADC pilot project. The LEA concluded they concur with Republic Services' conclusion that the ADC should continue to be used as an ADC at Sunshine Canyon Landfill (Attachment J).

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 K.

Completion of the ICE pilot 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 pilot project procedures was completed on March 2, 2017.

The ICE project was completed in September 2017. A report summarizing the results of the project was submitted to the LEA and DPW on December 8, 2017. Although it was difficult to provide a specific, supported conclusion based on the results of the ICE project, the following conclusions were presented:

- The placement of an additional 6" of soil was effective in controlling both instantaneous and integrated surface emissions during the study period;
- Posi-Shell® applied at twice the normal application rate was more effective than the Posi-Shell® applied at the normal rate;
- The use of the Posi-Shell® as intermediate cover is effective when used as part of the site's overall odor management plan as the application of this product has the following overall benefits:
 - Minimization of air-borne dust in areas where the Posi-Shell® was applied particularly to slope areas;
 - Provides an improved barrier to ambient air allowing an increase in applied vacuum without

increasing oxygen thus increasing vacuum for additional gas collection;

- Posi-Shell® provided an easier walking surface increasing site safety for those walking on this surface;
- Posi-Shell® provides an interim cover that can be integrated into vegetative cover or can be easily removed to promote waste-to-waste contact providing for effective liquid and gas movement.

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 was conducted throughout the ICE project period; no vegetation was observed growing within the grids that were the subject of the pilot project.

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 were submitted to SCAQMD for the grids included in the ICE project. The final report for the month of August 2017 was submitted on September 15, 2017.

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.

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 included 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 enhancement of the intermediate cover at the landfill was presented and incorporated into the Abatement Order (Action Plan).

The following presents a summary of the status of each of the intermediate cover enhancements included in the Action Plan:

ACTION	Target Completion	Current Progress
Install 21 acres of Closure Turf, an impermeable synthetic liner overlain by artificial turf	August 31, 2017	Deadline Met: 21 acres of Closure Turf was installed by the target completion date.
Apply 37 acres of a thick, flexible spray-on cover that serves as a temporary cover in new waste fill areas	August 31, 2017	Deadline Met: 38.5 acres of Posi-Shell was applied by the target completion date.
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: Areas have been graded, topsoil installed and straw wattles installed. Hydroseeding activities are scheduled for completion by December 31 st . Project completion has been hampered by high Santa Ana winds.

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 is presented above. No expansion of the application of the intermediate cover upgrades to additional surface emission monitoring grids has been proposed or required as of the date of this report.

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 and 153 new and/or replacement gas wells have been installed.

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 as final and directed Republic Services to implement the recommended actions (Attachment L).

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 M).

By letter dated October 31, 2017, SCAQMD was notified that the Revised Best Management Plan and Revised Odorous Load Management Plan had been implemented (Attachment M).

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 N).

Implementation of the proposed actions in the Physical Barriers and Dust-Odor Containment Structures report in part require the construction of the front entry berm improvements including the terminal stability berm. This project requires multiple approvals and is currently in the design stage.

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 O). 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 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 O). 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 O).

By letter dated September 14, 2017, DPW provided additional comments on submittals made to them that were the subject of this NOV. A meeting was held on October 3, 2017 with DPW and Republic Services personnel to discuss the comments. Responses to the comments were submitted to DPW on November 29, 2017.

BFIC has filed a petition in the Los Angeles County Superior Court, challenging the County's 2016 Notice of Violation alleging that BFIC failed to respond to information requests from the Los Angeles County Department of Public Works (DPW) concerning information related to odor mitigation, and, specifically, concerning the landfill's GCCS. BFIC maintains it has fully responded to DPW's information requests. BFIC also seeks the return of the \$174,000 penalty imposed by the Director of Regional

Planning based on the NOV. At a hearing held on December 20, 2017, a trial date of BFIC's petition has been set by this Court for June 13, 2017.

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 P).

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 that "DPH has determined the landfill is not in compliance with the Order to Abate". DPH subsequently sent a request to the Department of Regional Planning (DRP) to issue an NOV "based on odor violations". Although a response was sent to DPH on May 17, 2017, no further information is known regarding this item as of the date of this report.

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 reports for the second and third quarters of 2017 were submitted on August 2, 2017 and November 7, 2017, respectively.

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”*.

The most recent observations of the Deck C sage mitigation area noted that overall the area looks healthy, however many plant species were in a dormancy period. The area will continue to be monitored on a quarterly basis and those observations will be included in the quarterly vegetation reports.

10.1 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.

The construction of the Phase 2 CSS mitigation area on Deck B was initiated in October 2017. Grading of the area was completed in early November 2017; the project is scheduled to be completed in the first quarter of 2017.

11.0 Chatsworth Mitigation (City Q.C.9)

The following presents a summary of the work conducted in 2017 related to the Chatsworth Mitigation project.

11.1 Ordinance Amending Section 12.04 of the Los Angeles Municipal Code

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 (Section 11.2).

A conference call was held with representatives from the California Department of Fish and Wildlife (CDFW) in June 2017 to discuss their comments on the draft Ordinance. Fish and Wildlife personnel stated they could not agree with the Ordinance since the site

permit required a Conservation Agreement. In addition, Republic Services was informed that the original Streambed Alteration Agreement (SAA) R5-2002-0163 had expired and could not be amended to include a reference to the City Ordinance. In response to this, Republic Services submitted a Notification of Lake or Streambed Alteration Notification to the CDFW on October 26, 2017. By letter dated November 27, 2017, the CDFW notified Republic Services the submitted Notification was deemed complete (Attachment Q). CDFW also stated that if it is determined an Agreement is required for the project, a draft Agreement will be issued no later than January 26, 2018.

11.2 Addendum to the Mitigated Negative Declaration (MND)

The following contractors have been retained to develop the Addendum to the MND:

- Mike Zander and Associates (Zander) - Biological Resources
- John Minch and Associates (JMA) - Cultural Resources
- TetraTech - Air Quality

Field surveys for biological and cultural resources were conducted on November 17 and 18, 2016. Based on the findings of their field survey, 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 R). Based on this information, a Native American consultation was conducted. In cooperation with the Los Angeles Department of Water and Power (LADWP), consultation letters were sent out March 26, 2017 and responses requested by April 28, 2017. Responses received are included in Attachment R.

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 the sites in the project area. By letter dated June 13, 2017, the LADWP requested Republic Services to authorize JMA to conduct additional studies as requested by the Native American Consultation survey findings (Attachment R).

The additional field surveys were performed by JMA during the week of August 21, 2017 and also on September 13 - 14, 2017. The survey could not be completed during the week of August 21st due to excessive temperatures. Organic material was discovered at one location which was submitted for radiocarbon dating in accordance with JMA's procedures. As of the date of this report, JMA is completing the cultural resources portion of the Addendum to the MND; this document is expected to be completed in the first quarter of 2018.

12.0 Status of Alternative Fuels Vehicles (City/County)

The filling station located at 12881 Encinitas Avenue, Sylmar no longer provides E-85 fuel due to mechanical issues. There are no alternative E-85 filling stations in close proximity to Sunshine Canyon Landfill.

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; in 2017, one (1) unit had the engine replaced with a Tier 4 final engine and one (1) new unit was added to the fleet with a Tier 4 final engine that 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 staged on-site. The permit to operate this generator was received from SCAQMD in April 2017 (Permit No. G46227).

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 S).

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. As of the date of this report, this is the latest information regarding the start of this project.

15.0 Current and Planned Projects Outside the Disposal Area

Two projects involve 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^{11a} 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.

Additional comments on the Survey Monument Plan were received from DPW on July 6, 2017. Republic Services personnel met with DPW staff to discuss the comments on July 19, 2017. A revised Survey Monument Plan was submitted to DPW on August 23, 2017. In addition, comments were received on the Tree Survey Report that is required to accompany the Revised Exhibit A application. Republic Services met with personnel from the Department of Regional Planning to resolve these comments. The Tree Survey Report was approved by Regional Planning on November 29, 2017.

As of the date of this report, approval of the Revised Exhibit A ("A-2") Application for the SCE Power Pole and CC4 Stability Buttress Projects has not been received. 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.

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 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. By email dated October 10, 2017, one comment from the County's Design Division was received; the response to this comment was submitted to the County on November 8, 2017. Another comment from the County's Design Division was received via email dated November 30, 2017; the response to this comment including revised Grading and Drainage design plans was submitted to DPW on December 13, 2017.

By email dated December 20, 2017, DPW personnel informed Republic Services that a complete submittal including a soils report is required before DPW can review and issue an approval for the project. As of the date of this report, Republic Services personnel are putting together the required information and will submit the package to DPW during the week of December 25th.

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: SCS Engineering

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 has been conducted;

These two investigations were finalized the last week of May 2017. Based on the results of these investigations, a scope of work including the following items was developed:

- Removal of the loose material on the slope behind the block retaining wall;
- Grading of the slope as needed under the direction of a geologist;
- Removal of loose material behind the block wall to expose the v-ditch and promote drainage;
- General clean-up of the sidewalk area to re-establish the walkway.

This work was conducted during the week of October 23rd and was completed by October 27, 2017. A picture of the completed project is provided in Attachment T.

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 (250 pumps installed along with associated piping);
- Completion of ADC Pilot Project and submittal of report with findings and recommendation for continued use of ADC;
- Completion of the Intermediate Cover Enhancement (ICE) pilot project and submittal of report with findings and recommendations;
- Completion of the installation of 21 acres of Closure Turf;
- Completion of the application of 38.5 acres of Posi-Shell®;
- Implementation of the 57-acre vegetative cover project;
- Continued maintenance of City South Coastal Sage Mitigation Area;
- Completion of Cell CC-4 Part 2 and liner activities;
- Upgrades to aboveground leachate collection system;
- Receipt of new Industrial Wastewater Discharge Permit from City of Los Angeles Bureau of Sanitation;

Planned activities for the first and second quarters of 2018 include:

- Continued activities to respond to SCAQMD Abatement Order conditions – please refer to Section 8.1;

- CC4 Stability Butress project;
- Additional upgrades to the liquids management system;
- Landfill gas wellfield expansion activities;
- 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) 362-2141 if you have any questions.

Sincerely,



Chris Coyle
General Manager 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 Nugyen 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

October 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 2, 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 2, Sunshine Canyon Landfill* (Report), prepared by Geo-Logic Associates for Republic Service (Discharger) and dated October 2017. The Report documents the construction quality assurance (CQA) services performed during the construction of Cell CC-4, Part 2, which consists of approximately 6.2 acres of liner system at the Sunshine Canyon Landfill (Landfill) in Sylmar, California, that is owned and operated by the Discharger. The Report 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 June 12, 2017, July 28, 2017, September 11, 2017, September 28, 2017, and October 20, 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,



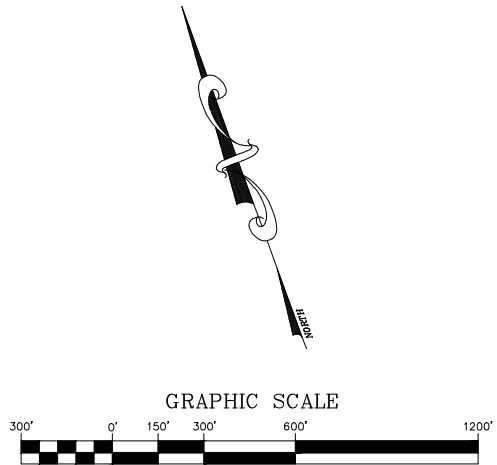
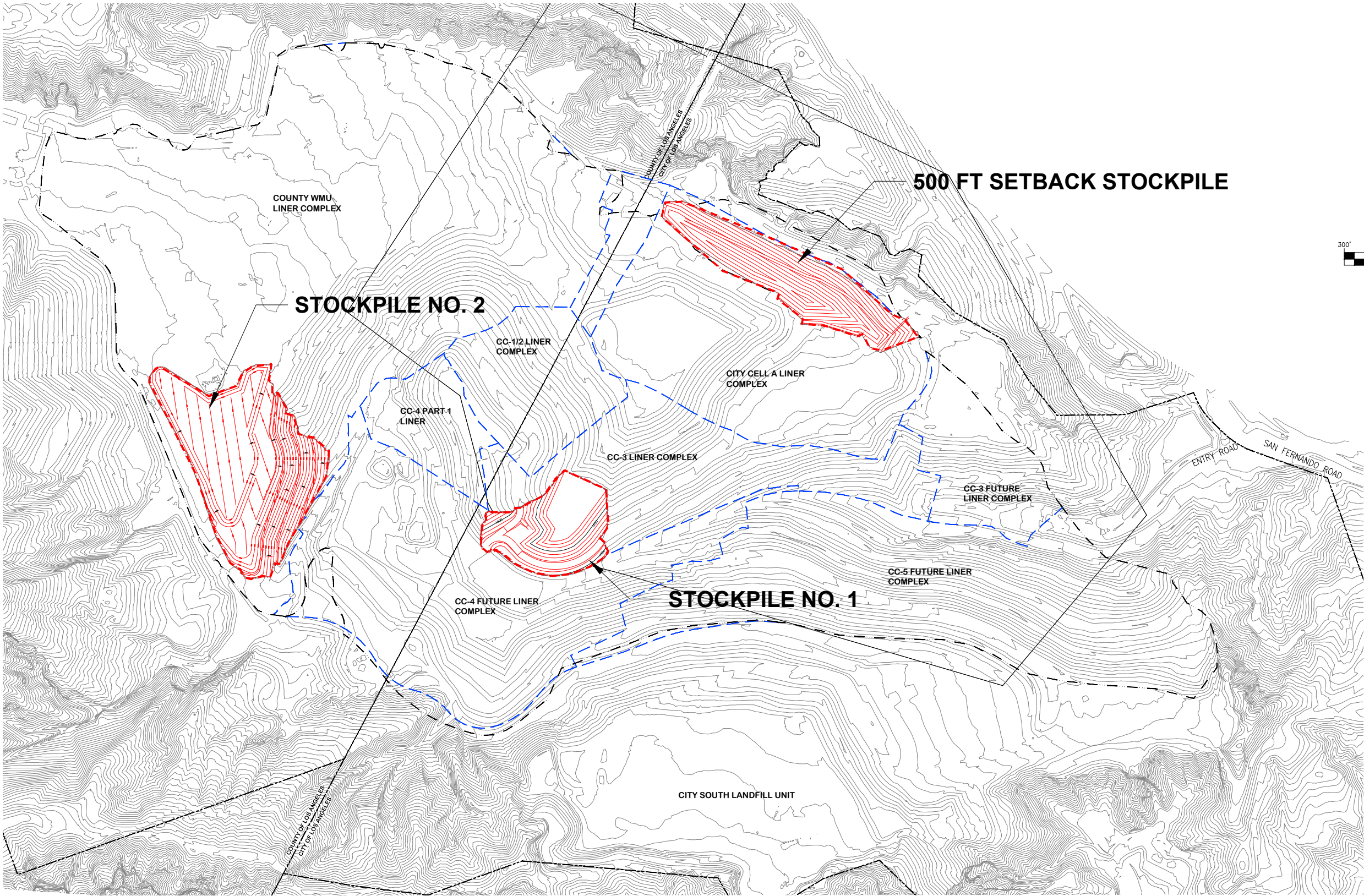
-Wen Yang, Ph.D., C.H.G.
Senior Engineering Geologist
Chief of Land Disposal Unit

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

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



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



Geo-Logic
ASSOCIATES

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

ATTACHMENT C

SUNSHINE CANYON LANDFILL



A REPUBLIC SERVICES COMPANY

August 30, 2017

Mr. David Thompson
SCL LEA – Program Manager
221 N. Figueroa Street
Suite 1250
Los Angeles, CA 90012

Subject: Perimeter Probe Gas Control Exceedance Probe P-207A; Facility No. 19-AA-2000

Dear Mr. Thompson:

We were notified by our independent gas system monitor RES Environmental Inc., that a probe registered an exceedance of over 5% for 27 CCR 20921(a)-Gas Monitoring and Control. Perimeter probe P-207A registered 59.1% methane during a routine monthly inspection on August 24, 2017. In accordance with 27 CCR 20921(b), and the site's Gas Monitoring and Control Plan, this letter is to inform your office of the nature and extent of the problem based on currently available information and the steps Sunshine Canyon Landfill staff have taken to protect public health and safety and the environment.

Perimeter probe P-207A is located in the far northern portion of Sunshine Canyon Landfill at a depth of approximately 10 feet below ground surface. The probe is located approximately 1,400 linear feet from the nearest limit of refuse in an area that was filled in with soil during grading operations in the 1990's. A sub-drain that serves as a perimeter collector gas well in close proximity to Probe 207 malfunctioned. We immediately repaired the vacuum line to the sub-drain. A gas sample was collected from the probe and sent to ATMAA Laboratory for testing for the 1150.1 Toxic List, methane, and TNMHC.

In accordance with the site's Gas Monitoring and Control Plan, RES Environmental Inc., performed the re-monitoring on August 30, 2017 and we are pleased to inform you that the probe registered 0.0% methane. We believe we have taken the appropriate corrective actions and have brought the probe back into compliance.

Our staff takes gas control very seriously, and as responsible operators, we will continue to constantly monitor all perimeter probes and the landfill gas collection system to ensure protection of public health and safety of the environment.

Please let me know if you have any questions and/or comments.

Sincerely,

Patti K. Costa, P.E.
Environmental Manager

Cc: David Thompson, SCL-LEA
Cc: Dee Lugo, SCL-LEA

ATTACHMENT D

BOARD OF PUBLIC WORKS
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CITY OF LOS ANGELES
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BUREAU OF SANITATION

—
ENRIQUE C. ZALDIVAR
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LISA B. MOWERY
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—
TIMEYIN DAFETA
HYPERION EXECUTIVE PLANT MANAGER

—
INDUSTRIAL WASTE
MANAGEMENT DIVISION
2714 MEDIA CENTER DRIVE
LOS ANGELES, CA 90065
OFFICE: (323) 342-8200
FAX: (323) 342-6111

October 18, 2017

SUNSHINE CANYON LANDFILL
14747 San Fernando Road
Sylmar, Ca 91342

In Reply Refer to: IU128862.prm/jnc

Attn: Josh Mills, Environmental Manager

ISSUANCE OF INDUSTRIAL WASTEWATER PERMIT FOR IU128862
PERMIT: W-535428

The Bureau of Sanitation has completed a review of Sunshine Canyon Landfill's application to discharge industrial wastewater to the City of Los Angeles sewer system. Pursuant to the Bureau's audit, it has been determined that this facility is subject to requirements as a Non-Categorical Significant Industrial User, and other applicable Federal, State and Local wastewater discharge requirements. Therefore, in accordance with provisions of the Los Angeles Municipal Code (L.A.M.C.) Section 64.30, this Industrial Wastewater Permit is being issued to include comprehensive permit conditions which identify the requirements that are applicable to Sunshine Canyon Landfill. All discharges from this facility and actions and reports relating thereto shall be in accordance with the terms and conditions of this permit.

This permit shall become effective at midnight on **October 18, 2017** and shall expire at midnight on **August 31, 2020**. During the term of this permit, the permittee shall immediately notify the Bureau of Sanitation of any changes to the facility, process, production, or pretreatment system that may change the characteristics which causes it to be different from that expressly allowed under this permit.

If there are any questions regarding these permit conditions, please contact Jocelyn Carrillo of my staff at (323) 342-6082.

Sincerely,

ENRIQUE C. ZALDIVAR, Director
LA Sanitation

By *Michael Simpson*
Michael Simpson, Division Manager
Industrial Waste Management Division

c: SIU Permitting Section
Bhupendra Patel, Chief Environmental Compliance Inspector II

zero waste • one water

Recyclable and made from recycled waste

AN EQUAL EMPLOYMENT OPPORTUNITY — AFFIRMATIVE ACTION EMPLOYER

RECEIVED NOV 01 2017

**INDUSTRIAL USER
PERMIT REQUIREMENTS AND CONDITIONS**

**Legal Name: Browning-Ferris Industries of Calif.,Inc.
Dba Name: SUNSHINE CANYON LANDFILL
Industrial User No: IU128862**

**INDUSTRIAL WASTEWATER PERMIT NO.
W-535428**

CITY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS
BUREAU OF SANITATION



INDUSTRIAL WASTE MANAGEMENT DIVISION
2714 MEDIA CENTER DRIVE
LOS ANGELES, CA 90065
(323) 342-6200

INDUSTRIAL WASTEWATER PERMIT

INDUSTRIAL USER NO: IU128862
PERMIT NO: W-535428
EFFECTIVE DATE: 09/01/2014
AMENDED DATE: NA
EXPIRATION DATE: 08/31/2020

LEGAL BUSINESS NAME: BROWNING-FERRIS INDUSTRIES OF CALIF., INC.

DOING BUSINESS AS: SUNSHINE CANYON LANDFILL

MAILING ADDRESS: 14747 SAN FERNANDO ROAD
SYLMAR, CA 91342

LOCATION ADDRESS: 14747 SAN FERNANDO ROAD
SYLMAR, CA 91342

CATEGORY: NON-CATEGORICAL SIU

POINT OF DISCHARGE: PUBLIC SEWER

In accordance with the provisions of the Los Angeles Municipal Code (L.A.M.C.) Section 64.30, the above identified industrial user is hereby authorized to discharge industrial wastewater through the approved point of discharge identified herein in accordance with the discharge limitations, conditions, and requirements set forth in this permit and the L.A.M.C. Compliance with this permit does not relieve the industrial user of its obligation to comply with all pretreatment regulations, standards or requirements under local, State and Federal laws, including any such laws, regulations, standards or requirements that may become effective during the term of this permit.

The industrial user must comply with the provisions of L.A.M.C. Section 64.30 and all terms and conditions of this permit. Noncompliance with the terms and conditions of this permit shall constitute a violation of the L.A.M.C. Section 64.30 and may subject the industrial user to administrative actions or other legal proceedings. This permit becomes void upon any change of ownership or location whatsoever.

Enrique C. Zaldivar, Director
LA Sanitation

BY: Michael Simpson

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PART 1 - SAMPLE POINT DESCRIPTION AND FACILITY FLOW INFORMATION**A. Sample Point**

The industrial user is authorized to discharge industrial wastewater to the City of Los Angeles sewer system from the sample point(s) listed below.

INDUSTRIAL WASTEWATER PERMIT	SAMPLE POINT	FLOW PER OPERATIONAL DAY (GPD)		DESCRIPTION
		TOTAL	PROCESS	
W-535428	01	300,000	300,000	Secured Sampling Facility is located at Magnetic Flow meter Vault.

B. Industrial User Flow

Facility Flow Information ¹	Total (GPD)	Process (GPD)
	300,000	300,000

Footnotes to Sample Point Description and Industrial User Flow Information

- ¹ Sunshine Canyon Landfill shall not discharge greater than 300,000 gpd of leachate to the City sewer system. Refer to **Part 5. B – Special Conditions**.

PART 2 - DISCHARGE LIMITATIONS

The discharge from the designated sample points shall not exceed the following discharge limitations:

A. Industrial Wastewater Permit W-535428

1. Sample Point 01 – Significant Non-Categorical Industrial User

DISCHARGE LIMITATIONS	
Constituent	Local Instantaneous Maximum, mg/l
Arsenic (Total)	3.00
Cadmium (Total)	15.00
Chromium (Total)	10.00
Copper (Total)	15.00
Lead (Total)	5.00
Nickel (Total)	12.00
Silver (Total)	5.00
Zinc (Total)	25.00
Cyanide (Total)	10.00
Cyanide (Free) ¹	2.00
Sulfides (Dissolved)	0.10
Oil & Grease (Total)	600.00
Oil & Grease (Floatable)	None Visible
pH (Standard Units)	5.50 - 11.00

Footnotes to Discharge Limitations

¹Cyanide (Free) shall mean cyanide amenable to chlorination as defined by 40 CFR 136.

PART 3 – MONITORING REQUIREMENTS

The industrial user shall monitor the designated sample point, for the following constituents, at the indicated frequency and by the indicated sample type.

A. Industrial Wastewater Permit W-5354281. Sample Point 01

MONITORING REQUIREMENTS FOR REGULATED PARAMETERS		
Constituent	Measurement Frequency	Sample Type
Daily Sample Flow	Semi-Annual	Flow
Arsenic (Total)	Semi-Annual	Grab or Composite ¹
Cadmium (Total)	Semi-Annual	Grab or Composite ¹
Chloride ²	Semi-Annual	Grab or Composite
Chromium (Total)	Semi-Annual	Grab or Composite ¹
Copper (Total)	Semi-Annual	Grab or Composite ¹
Cyanide (Free)	Semi-Annual	Grab
Cyanide (Total)	Semi-Annual	Grab
Dissolved Sulfides	Semi-Annual	Grab or Composite ¹
Lead (Total)	Semi-Annual	Grab or Composite ¹
Nickel (Total)	Semi-Annual	Grab or Composite ¹
Oil & Grease (Total)	Semi-Annual	Grab
pH ³	Semi-Annual	Grab
Silver (Total)	Semi-Annual	Grab or Composite ¹
Zinc (Total)	Semi-Annual	Grab or Composite ¹

B. Representative Monitoring and Sampling

1. Monitoring and sampling shall be carried out during a period of normal operations.
2. All handling and preservation of collected samples and laboratory analyses of samples shall be performed in accordance with 40 CFR Part 136 and amendments thereto unless specified otherwise in the monitoring conditions of this permit. The handling, storage and analyses of all samples taken for the determination of the wastewater characteristics discharged shall be performed by laboratories certified by the State of California or approved by the Director of the Bureau of Sanitation.
3. The detection limits employed for wastewater analysis shall be lower than the permit limits established for a given parameter.
4. The industrial user is responsible for maintaining and cleaning the designated sample point(s) to prevent any build-up of oil and grease, sediment or sludge. Failure to do so does not invalidate sampling test results. Analytical results from samples taken from designated sample points according to accepted sampling procedure shall be accepted as binding.
5. Sample Points identified in the Industrial Wastewater Permit shall not be changed without notification and approval by the Director.

FOOTNOTES TO MONITORING REQUIREMENTS

¹The local limits for heavy metals can be compared to the results from grab sampling as well as composite sampling.

²The City of Los Angeles is establishing a database for chlorides.

³Refer to Part 5. A – Special Conditions.

PART 4 – REPORTING REQUIREMENTS**A. Self-Monitoring**

1. The industrial user shall implement a self-monitoring program for the designated Industrial Wastewater Permit. Monitoring results obtained shall be summarized and reported on the enclosed report form entitled "Periodic Compliance Report" and submitted with a US Post Office postmark date by the 15th day of the month following the monitoring period. Facsimiles (faxes) of self-monitoring reports shall not be accepted. Reports with original signatures must be submitted by the due date.

The first self-monitoring report for the monitoring period of **July 1 – December 31, 2017** shall be submitted by **January 15, 2018**. Subsequent reports shall be submitted in accordance with the following schedule:

SELF-MONITORING REPORT SCHEDULE			
Industrial Wastewater Permit	Type of Report	Monitoring Period	Report Due Date
W-535428 Sample Point 01	Local Limits Periodic Compliance Report	Jan 1 - Jun 30 Jul 1 - Dec 31	Jul 15 Jan 15

2. All portions of the Periodic Compliance Report form must be completed or the report may not be accepted.
3. The report shall indicate the nature and concentration of all pollutants in the effluent for which sampling and analyses were performed including measured or estimated maximum and average daily flows. The report shall be based upon data obtained through appropriate sampling and analyses performed which represents the conditions occurring during the period covered by the report.
4. Copies of all laboratory results shall be submitted with each report.
5. The Bureau of Sanitation will not accept reports where monitoring was conducted outside the monitoring period specified in this permit.

B. Self-Monitoring Report Submittal

All self-monitoring reports required by this permit shall be submitted to the Director at the following address:

City of Los Angeles
Bureau of Sanitation
Industrial Waste Management Division
2714 Media Center Drive
Los Angeles, CA 90065

Attn: Information Systems Support Squad

C. Additional Monitoring

If the industrial user monitors any pollutant more frequently than required by this permit, using test procedures prescribed in 40 CFR 136 or amendments thereto or otherwise approved by EPA or specified in this permit, the results of such monitoring shall be reported in the compliance report and submitted to the Director.

D. Automatic Resampling

If the results of the industrial user's wastewater analysis indicate a violation has occurred, the industrial user must comply with the following:

1. Inform the Director of the violation within 24 hours by contacting the Bureau of Sanitation Industrial Waste Management Division SIU Inspection Group at (323) 342-6200; and
2. Repeat the sampling and pollutant analysis and submit, in writing, the results of this second analysis within 30 days after becoming aware of the violation.

E. Pre-notification of Monitoring and Sampling

The industrial user shall notify the SIU Inspection Group by telephone at (323) 342-6200 at least 48 hours in advance of any monitoring or sampling to be performed. Notification shall include the date, time and location of proposed monitoring or sampling. Monitoring and sampling shall be carried out during a period of normal operations. Prior to the commencement of any sampling or monitoring, the Director may request that the industrial user furnish to the Director a split sample and all supporting data (i.e., methodology, flow measuring data, strip chart recordings and other pertinent information). The Director reserves the right to refuse any data developed from the monitoring or sampling activity if the industrial user fails to comply with the pre-notification procedure or other requirements of sampling and analysis.

PART 5 – SPECIAL CONDITIONS**A. pH MONITORING AND RECORDING SYSTEM**

The pH of the wastewater discharge to the sewer system shall be monitored and recorded continuously using a pH meter and recording device. To ensure the proper operation and continued accuracy of the pH meter, Sunshine Canyon Landfill shall clean, maintain, and calibrate the device periodically in accordance with the manufacturer's requirements. A logbook for pH calibration must be kept. The pH chart must be initiated daily by an operator at the facility to validate the proper operation of the pH monitoring and recording system.

B. DISCHARGE REQUIREMENTS

Sunshine Canyon Landfill is allowed to discharge a total of 300,000 gpd (208.33 gpm) of landfill leachate at a maximum flow rate of 250 gpm, not exceeding 300,000 gallons per day through the sewer connection located at 14747 N. San Fernando Road, Sylmar into the City of Los Angeles sewer system.

C. SECURED SAMPLING FACILITY INSTALLATION

1. **By November 30, 2017, Sunshine Canyon Landfill** shall submit plans and diagrams for installation of a Secured Sampling Facility (SSF) at Sample Point 01, located at Magnetic Flow meter Vault, for Bureau approval. The SSF must be an enclosed structure with a bottom opening for tubing and probes and possesses minimum inside dimensions of 24" X 27" X 36". A lockable door is required to provide safe and convenient access to the internal space of the SSF by representatives of the Bureau. The door must be equipped with a latch and hasp or other mechanism such that a padlock can be installed by a Bureau representative to secure the facility during sampling with Bureau equipment. The SSF must be designed such that a sampling tube and pH probe cable can pass from the monitoring equipment to the sample point. The design must ensure that such a sampling tube will be tamper proof. The SSF may be designed so that it is removable when not in use. However, when in use, it must be secured to the sampling location such that it cannot be removed until the sampling event is completed and the Bureau has unlocked the door and removed its equipment.

2. **Within 30 days of approval**, Sunshine Canyon Landfill shall complete installation of the SSF.

D. SAMPLE POINT IDENTIFICATION

Within **30 days** after installation of the Sampling Point, Sample Point shall be identified with a sign or placard containing the following information:

City of Los Angeles
Sample Point 01
IW Permit No. W-535428

The sign or placard shall have minimum dimensions of 4 inches by 16 inches, with lettering a minimum height of 3/4 inches. The sign or placard shall be protected, or placed on a material which will withstand corrosion and water damage. The sign or placard shall be posted at the sampling location to allow for immediate identification.

E. FLOW METER CALIBRATION

To ensure proper operation and continued accuracy of the industrial wastewater flow measurement device, Sunshine Canyon Landfill shall clean, maintain, and calibrate the device periodically in accordance with the manufacturer's requirements. A maintenance record shall be available at all times for Bureau of Sanitation review.

PART 6 – STANDARD CONDITIONS**A. Prohibitions****1. General Prohibitive Standards**

The Industrial User shall comply with all the general prohibitive discharge standards in the General Pretreatment Regulations, 40 CFR 403, and the L.A.M.C. Section 64.30. Except as expressly allowed in an Industrial Wastewater Permit, no Industrial User shall introduce or cause to be introduced into the POTW any of the following:

- a) Gasoline, mercury, total identifiable chlorinated hydrocarbons, kerosene, naphtha, benzene, toluene, xylene, ethers, alcohols, ketones, aldehydes, peroxides, chlorates, perchlorates, bromates, carbides, hydrides, solvents, pesticides or jet fuel;
- b) Liquids, solids or gases which by reason of their nature or quantity are flammable, reactive, explosive, corrosive, or radioactive, or by interaction with other materials could result in fire, explosion or injury. Pollutants which create a fire or explosion hazard in the POTW, including, but not limited to, wastewater with a closed cup flashpoint of less than 140 degrees Fahrenheit or 60 degrees Centigrade using the test methods specified in 40CFR261;
- c) Solid or viscous materials which could cause obstruction to the flow or operation of the POTW;
- d) Toxic pollutants in sufficient quantity to injure or interfere with any wastewater treatment process, including private pretreatment systems, to constitute a hazard or cause injury to human, animal, plant or fish life, or to exceed any limitation set forth in this Permit;
- e) Noxious or malodorous liquids, gases, or solids in sufficient quantity either singly or by interaction with other materials to create a public nuisance, hazard to life, or to prevent entry of any person to the POTW;
- f) Pollutants which result in the presence of toxic gases, vapors or fumes within the POTW in a quantity that may cause acute worker health and safety problems;
- g) Material of sufficient quantity to interfere with any POTW treatment plant process or to render any product thereof unsuitable for reclamation and reuse;
- h) Material in sufficient quantity to cause the POTW to be in noncompliance with biosolids use or disposal criteria, guidelines or regulations in conjunction with Section 405 of the Act, the Solid Waste Disposal Act (SWDA), the Clean Air Act, the Toxic Substances Control Act, the Marine Protection Research and Sanctuaries Act, or State criteria (including those contained in any state sludge management plan prepared pursuant to Title II of SWDA) applicable to the biosolids management method being used;
- i) Material which will cause the POTW to violate its NPDES Permit, applicable Federal and State statutes, rules or regulations;
- j) Wastewater containing pigment which is not removed in the ordinary POTW treatment process and which creates a visual contrast with the material appearance of the POTW discharge observable at the point of POTW discharge;
- k) Wastewater having a heat content in such quantities that the temperature of the wastewater at the introduction into the POTW Collection system exceeds 140 degrees Fahrenheit, or at the introduction into the POTW treatment plant exceeds 104 degrees Fahrenheit;
- l) Petroleum oil, nonbiodegradable cutting oil, or products of mineral oil origin in amounts that will cause interference or pass through;

- m) Pollutants, including oxygen demanding pollutants, released at a flow rate or pollutant concentration which will cause or contribute to interference;
- n) Storm water collected and discharged to the POTW;
- o) Single pass cooling water in excess of 200 gallons per day discharged to the POTW;
- p) Wastewater which constitutes a hazard or causes injury to human; animal, plant or fish life or creates a public nuisance;
- q) Recognizable portions of the human or animal anatomy;
- r) Floatable material which is readily removable;
- s) Radioactive wastes or isotopes;
- t) Grinder food wastes from commercial kitchens, markets, or food plants;
- u) Trucked or hauled pollutants, except at discharge points designated by the City;
- v) Human or animal blood suspected or known to contain bloodborne pathogen(s);
- w) Pharmaceutical wastes;
- x) Medical wastes; or
- y) Sharps.

B. Permit Provisions

1. Severability

The provisions of this permit are severable, and if any provision of this permit or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby.

2. Duty to Comply

The Industrial User must comply with the provisions of L.A.M.C. 64.30 and all conditions of this permit. Failure to comply with the requirements of this permit may be grounds for administrative action or enforcement proceedings, including civil or criminal penalties, injunctive relief and summary abatement.

3. Duty to Mitigate

The Industrial User shall take all reasonable steps to minimize or correct any adverse impact to the public treatment plant or the environment resulting from noncompliance with this permit, including such accelerated or additional monitoring as necessary to determine the nature and impact of the noncomplying discharge.

4. Modification or Revision of the Permit

This permit may be modified, revoked and reissued or terminated for good causes including, but not limited to, the following:

- a) The incorporation of any new or revised Federal, State or Local pretreatment standards or requirements;
- b) Material or significant alterations or additions to the Industrial User's operational processes or discharge volume or character which were not covered in the effective permit;

- c) A change in any condition that requires either a temporary or permanent reduction or elimination of the authorized discharge;
- d) Information indicating that the permitted discharge poses a threat to the City of Los Angeles' collection and treatment systems, POTW personnel or the receiving waters;
- e) A violation of any terms or conditions of this permit;
- f) Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts;
- g) A revision of or a grant of variance from such categorical standards pursuant to 40 CFR 403.13.
- h) A request of the Industrial User, provided such request does not create a violation of any existing applicable requirements, standards, laws or rules and regulations; or
- i) A correction of typographical or other errors in the permit.

5. Property Rights

The issuance of this permit does not convey any property rights of any sort or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor does it authorize any violation of Federal, State or Local laws or regulations.

6. Limitation of Permit Transfer

An Industrial Wastewater Permit shall not be transferable by operation of law or otherwise, either from one location to another or from one person to another. Statutory mergers or name changes shall not constitute a transfer or a change in ownership.

7. Duty to Reapply

To continue an activity regulated by this permit after the expiration date, the Industrial User must file an application for permit renewal at least 90 days before the expiration date of this permit.

8. Dilution

The Industrial User shall not increase the use of potable or process water or, in any way, attempt to dilute an effluent as a partial or complete substitute for adequate treatment to achieve compliance with the limitations contained in this permit.

9. Compliance with Applicable Pretreatment Standards and Requirements

The Industrial User shall comply at all times with any and all applicable Local, State and Federal pretreatment standards and requirements including Best Management Practices and any such standards or requirements that may become effective during the term of this permit. In addition, the Industrial User may be required to prepare a pollution prevention plan.

10. Confidentiality

- a) Any information, except for discharge and effluent data, submitted to the City pursuant to this Permit may be claimed by the Industrial User to be confidential. Any such claim must be asserted at the time of submission of the information or data to the City. The claim may be asserted by stamping the words "Confidential Business Information" on each page containing such information or by other means; however, if no claim is asserted at the time of submission, the City may make the information available to the public without further notice. If such a claim is asserted, the information will be treated in accordance with the procedures set forth in 40 CFR Part 2 (Public Information).
- b) Information and data provided to the City which is effluent data shall be available to the public without restriction.

C. Operation and Maintenance of Pollution Controls**1. Proper Operation and Maintenance**

The Industrial User shall at all times properly operate and maintain all facilities and systems for treatment and control (and related appurtenances) which are installed or used by the Industrial User to achieve compliance with the conditions of this permit. Proper operation and maintenance includes but is not limited to effective performance, adequate funding, adequate operator staffing and training and adequate laboratory and process controls including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of the permit.

2. Duty to Halt or Reduce Activity

Upon reduction of efficiency of operation or loss or failure of all or part of the pretreatment facility, the Industrial User shall, to the extent necessary to maintain compliance with its permit, control its production or discharge (or both) until operation of the pretreatment facility is restored or an alternative method of pretreatment is provided. This requirement applies, for example, when the primary source of power of the pretreatment facility fails or is reduced. It shall not be a defense for an Industrial User in an enforcement action to state that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

3. Removed Substances

Solids, sludge, filter backwash or other pollutants removed in the course of treatment or control of wastewaters shall be disposed of in accordance with section 405 of the Clean Water Act and Subtitles C and D of the Resource Conservation and Recovery Act.

4. Bypass of Treatment Facilities

- a) Bypass is prohibited unless it is unavoidable to prevent loss of life, personal injury or severe property damage or no feasible alternatives exist.
- b) The Industrial User may allow bypass to occur which does not cause effluent limitations to be exceeded, but only if it is also for essential maintenance to assure efficient operation.
- c) Notification of bypass:
 - (1) Anticipated bypass. If the Industrial User knows in advance of the need for a bypass, written notice shall be submitted to the Director at least ten days prior to the anticipated date of bypass.
 - (2) Unanticipated bypass. The Industrial User shall provide oral notice of an unanticipated bypass that exceeds applicable Pretreatment Standards to the Director at (323) 342-6200 within 24 hours from the time the Industrial User becomes aware of the bypass. A written notice shall also be provided within 5 days of the time the Industrial User becomes aware of the bypass. The written notice shall contain the following:
 - (i) A description of the bypass including its cause and duration;
 - (ii) Whether the bypass has been corrected; and
 - (iii) The steps taken or to be taken to reduce, eliminate and prevent reoccurrence of bypassing.

D. Monitoring and Records**1. Flow Measurements**

If flow measurement is required by this permit, the appropriate flow measurement devices and methods consistent with approved scientific practices shall be selected and used to ensure the accuracy and reliability of measurements of the volume of monitored discharge. The devices shall be installed, calibrated and maintained to ensure that the accuracy of the measurements are consistent with the accepted capability of that type of device. Devices selected shall be capable of measuring flows with a

maximum deviation of less than 5 percent from true discharge rates throughout the range of expected discharge volumes.

2. Inspection and Entry

The Industrial User shall allow the Director or an authorized representative, upon the presentation of credentials and other documents, entry to and inspection of the premises. The applicant, by accepting any permit issued pursuant to L.A.M.C. Section 64.30, does hereby consent and agree to the entry upon the premises, described in the permit, by Department personnel for the following purposes as required by this permit or L.A.M.C Section 64.30 or other applicable laws. The City shall be afforded access at all reasonable times:

- a) for the purposes of inspection, sampling, flow measurement, examination of records in the performance of other authorized duties;
- b) to set up on the Industrial User's property such devices as are necessary to conduct sampling inspections, compliance monitoring, flow measuring or metering operations;
- c) to inspect and copy any records, reports, test results or other information required to carry out the provisions of L.A.M.C. Section 64.30, the industrial wastewater permit, or other applicable laws; and
- d) to photograph any waste, waste container, vehicle, waste treatment process, discharge location, or violation discovered during an inspection.

The applicant, by accepting any permit issued, does hereby consent and agree to entry upon the premises as described herein. Any person violating this authority shall be guilty of a misdemeanor.

3. Retention of Records

- a) The Industrial User shall retain records of all monitoring information, including documentation associated with Best Management Practices and all calibration and maintenance records, all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by this permit and records of all data used to complete the application for this permit, for a period of at least three years from the date of the sample, measurement, report or application. This period may be extended by request of the City of Los Angeles at any time.
- b) All records that pertain to matters that are the subject of special orders or any other enforcement or litigation activities brought by the City of Los Angeles shall be retained and preserved by the Industrial User until all enforcement activities have concluded and all periods of limitation with respect to any and all appeals have expired.

4. Record Contents

Records of sampling and analyses shall include the following:

- a) the date, exact place, time and methods of sampling or measurement, and sample preservation techniques or procedures;
- b) Who performed the sampling or measurements;
- c) The date(s) analyses were performed;
- d) Who performed the analyses;
- e) The analytical techniques or methods used; and
- f) The results of such analyses.

5. Falsifying Information

No person shall knowingly make any false statement, representation or certification in any application, record, report, plan or other document filed with the City of Los Angeles. In addition, no person shall tamper with or knowingly render inaccurate any monitoring device required under this permit.

The reports and other documents required to be submitted or maintained under this Industrial Wastewater Permit shall be subject to:

- a) The provisions of 18 U.S.C. Section 1001 relating to fraud and false statements;
- b) The provisions of Section 309 (c) (4) of the Clean Water Act (CWA), as amended, governing false statements, representation or certification; and
- c) The provisions of Section 309 (c) (6) of the Clean Water Act (CWA), as amended, regarding responsible corporate officers.

E. **Additional Reporting Requirements**

1. Notification of Planned Changes

The Industrial User shall immediately notify the Director in advance of any significant change to the Industrial User's operations or system which might alter the nature, quality, or volume of its wastewater including the listed or characteristic hazardous wastes for which the Industrial User had submitted initial notification under 40 CFR 403.12(p). The Director may require that a new Industrial Wastewater Permit application be filed and a new permit obtained before any planned changes take place.

2. Duty to Provide Information

The Industrial User shall furnish to the Director any information which the Director may request to determine whether cause exists for modifying, revoking and reissuing or terminating this permit. The Industrial User shall also furnish to the Director, upon request, copies of records required to be kept by this permit.

3. Notification of a Slug or Potential Slug Discharge

The Industrial User shall notify the Director immediately upon the occurrence of a slug discharge or any changes at its facility affecting the potential for a slug discharge of substance(s) prohibited by L.A.M.C. Section 64.30 that may enter the public sewer. The Director shall be notified by telephone at (323) 342-6200. The notification of a slug discharge shall include location of discharge, date and time thereof, type of waste, including concentration and volume, and corrective action taken. The Industrial User's notification of accidental cases in accordance with this permit does not relieve it of other reporting requirements that arise under Local, State or Federal laws.

Within five (5) days following an accidental discharge, the Industrial User shall submit to the Director a detailed written report. The report shall contain the following:

- a) A description and cause of the slug or accidental discharge, the cause(s) thereof and the impact on the Industrial User's compliance status. The description should also include the location of discharge and the type, concentration and volume of waste.
- b) The duration of noncompliance, including exact dates and times of noncompliance, and if the noncompliance continues, the time by which compliance is reasonably expected to occur.
- c) All steps taken or to be taken to reduce, eliminate and prevent recurrence of such a slug discharge, accidental discharge or any other conditions of noncompliance.

4. Operating Upsets

Any Industrial User that experiences an upset in operations that places the Industrial User in a temporary state of noncompliance with the provisions of either this permit or with L.A.M.C. Section 64.30 shall notify the Director within 24 hours of becoming aware of the upset at (323) 342-6200. The notification shall include the location of discharge, type of material, concentration and volume, and corrective actions taken.

A written follow-up report of the upset shall be filed by the Industrial User with the Director within five (5) days. The report shall contain the following information:

- a) A description of the upset, the cause(s) thereof and the upset's impact on the Industrial User's compliance status;
- b) The duration of noncompliance, including exact dates and times of noncompliance, and if the noncompliance continues, the time by which compliance is reasonably expected to occur; and
- c) All steps taken or to be taken to reduce, eliminate and prevent recurrence of such an upset or other conditions of noncompliance.

The report must also demonstrate that the treatment facility was being operated in a prudent and workmanlike manner.

A documented and verified operating upset shall be an affirmative defense to any enforcement action brought against the Industrial User for violations attributable to the upset event.

5. Slug Discharge Control Plan

Upon request by the Bureau of Sanitation, the Industrial User is required to submit a Slug Discharge Control Plan to address how the Industrial User will respond to spills, bypass, and any accidental discharges that could violate any permit limits or conditions or impact the City sewer system. The plan shall contain detailed procedures to be followed by the Industrial User in the event a slug discharge occurs. The Slug Discharge Control Plan must contain, at a minimum, the following:

- a) Description of sewer discharge practices, including non-routine batch discharges;
- b) Description of stored chemicals including type and characteristic, volume, and chemical hazard classification;
- c) Procedures for promptly notifying the City of slug discharges, including any discharges that would violate a prohibition under 40 CFR 403.5(b), with procedures for follow-up written notification within five days;
- d) Any necessary procedures to prevent adverse impact from accidental spills, including inspection and maintenance of storage areas, handling and transfer of materials, loading and unloading operation, control of plant site run-off and worker training;
- e) Any necessary measures for building any containment structures or equipment;
- f) Any necessary measures for controlling toxic organics (including solvents); and/or
- g) Measures and equipment for emergency response.

6. Notification of Hazardous Waste Discharged into POTW

An Industrial User not exempt from the requirements under 40 CFR 403.12(p) shall notify the City of Los Angeles, Bureau of Sanitation; the EPA Region 9, Hazardous Waste Management Division; and the California Environmental Protection Agency, Department of Toxic Substances Control in writing of any discharge into the City of Los Angeles sewer system of a substance, which, if otherwise disposed of, would be a hazardous waste under 40 CFR part 261. The written notification shall be submitted to the City of Los Angeles Bureau of Sanitation, the EPA Region 9 and the California Environmental Protection Agency.

7. Signatory Requirements

All applications, reports or information submitted by the Industrial User to the Director must contain the following certification statement and be signed by an authorized representative indicated below:

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

An authorized representative shall mean the following:

- (a) a president, secretary, treasurer, or vice-president in charge of a principal business function, or any other person who performs similar policy or decision-making functions, if the Industrial User is a corporation;
- (b) the manager of one or more manufacturing, production, or operating facilities, provided the manager is authorized to (1) make management decisions that govern the operation of the regulated facility including having the explicit or implicit duty of making major capital investment recommendations, and initiate and direct other comprehensive measures to assure long-term environmental compliance with environmental laws and regulations; (2) ensure that the necessary systems are established or actions taken to gather complete and accurate information for control mechanism requirements; and (3) sign documents in accordance with corporate procedures;
- (c) a general partner or proprietor if the Industrial User is a partnership or proprietorship, respectively;
- (d) a principal executive officer or director having responsibility for the overall operation of the discharging facility or a ranking elected official if the Industrial User is a governmental entity, charitable organization or other such unincorporated entity; or
- (e) a representative authorized in writing by any individual designated above, if the authorization is submitted to the Director and specifies an individual or a position having responsibility for the overall operation of the facility. This includes the position of plant manager, a position of equivalent responsibility, or an individual having overall responsibility for environmental matters for the company. If an authorization under Paragraph (e) is no longer accurate because a different individual or position has the responsibility for the overall operation of the facility, or overall responsibility for environmental matters of the company, a new authorization satisfying the requirements of Paragraph (e) of this Permit must be submitted to the Director prior to, or together with, any reports to be signed by an authorized representative.

8. Annual Publication

A list of all industries which were in significant noncompliance of applicable federal pretreatment standards, Best Management Practices or other pretreatment requirements during the twelve (12) previous months shall be annually published by the Director in a newspaper(s) of general circulation that provides meaningful public notice within the jurisdiction(s) served by the POTW. Accordingly, the Industrial User is apprised that noncompliance with this permit may lead to an enforcement action and may result in publication of its name in an appropriate newspaper. For purposes of this provision, significant noncompliance is defined under 40 CFR 403.8 (f)(2)(viii) and L.A.M.C. Section 64.30.E.8.

9. Civil and Criminal Liability

Nothing in this permit shall be construed to relieve the Industrial User from civil and/or criminal penalties for noncompliance under L.A.M.C. Section 64.30 or State or Federal laws and regulations.

10. Penalties for Violations of Permit Conditions

The L.A.M.C. Section 64.30 provides that any person who violates a permit condition is subject to a civil penalty in the maximum sum provided by law for each day in which such violation occurs. Any person who willfully or negligently violates permit conditions is subject to criminal penalties of up to \$1000.00 per violation per day and/or by imprisonment in the County Jail for a period of not more than six (6) months. The Industrial User may also be subject to sanctions under State and/or Federal law.

11. Liability For Costs Incurred From Unlawful Discharge

Whenever any Industrial User introduces or causes to be introduced wastewater in violation of this permit or the L.A.M.C. and such discharge, either singly or by interaction with other discharges, results in damage to or is otherwise detrimental to or adversely affects the P.O.T.W., the storm drain system, or any Waters of the State, said Industrial User shall be liable to the City for reasonable costs necessary to correct that discharge, detriment or adverse effect, including, but not limited to labor, material, inspection, transportation, overhead, and incidental expenses associated with the corrective action. The Industrial User shall additionally be liable to the City for the reasonable costs of investigation by the City arising from the unlawful discharge.

12. Civil Liability

Violation of any pretreatment standards or requirements or any term or condition or applicable compliance schedule of this permit, the Industrial User shall be civilly liable to the City in a sum of not to exceed twenty-five thousand dollars (\$25,000) a day for each violation.

13. Resource Conservation Recovery Act Notification and California Hazardous Waste Control Law

It is the responsibility of the Industrial User to ensure that the operations performed at their site comply with federal hazardous waste management regulations under subtitles C & D of the Resource Conservation and Recovery Act (RCRA) and California hazardous waste management regulations under the Hazardous Waste Control Law (Chap. 6.5, HSC, Sec. 25100 et. seq.) and California Code of Regulations (CCR), Titles 8 and 22. For information on federal and state hazardous waste regulations, contact the California Environmental Protection Agency, Department of Toxic Substances Control.

F. Definitions

1. Best Management Practices (BMP) - Activities, prohibitions of practices, maintenance procedures, and other management practices to prevent or reduce pollutants in discharges. BMP also include treatment requirements, operating procedures, and practices to control plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw materials storage.
2. Bi-Monthly - Once every other month.
3. Bypass - The intentional diversion of wastestreams from any portion of an Industrial User's treatment facility.
4. Categorical Pretreatment Standards - Limitations on pollutant discharges to POTWs, promulgated by EPA in accordance with Section 307 of the Clean Water Act, that apply to specified process wastewaters of particular industrial categories.
5. Commercial Establishment - A private establishment such as a restaurant, hotel, laundry, store, filling station, or recreational facility. A nonprofit private or government entity such as a church, school, hospital, military facility, correctional institution recreational facility or a facility owned or operated by a charitable organization is considered a commercial establishment.

6. Commingled Load – A load of septage which includes septage generated both within and outside the City's boundaries.
7. Composite Sample - A sample that is collected over time, formed either by continuous sampling or by mixing discrete samples. The sample may be composited either as a flow proportional composite sample (collected either as a constant sample volume at time intervals proportional to stream flow or collected by increasing the volume of each aliquot as the flow increases while maintaining a constant time interval between the aliquot) or as a time composite sample (composed of discrete sample aliquot collected in one container at constant time intervals providing representative samples irrespective of stream flow).
8. Cooling Water
 - a) Uncontaminated - Water used only for cooling purposes which has no direct contact with any raw material, intermediate or final product and which does not contain a level of contaminants detectably higher than that of the intake water.
 - b) Contaminated - Water used only for cooling purposes which may become contaminated either through the use of water treatment chemicals used for corrosion inhibitors or biocides or by direct contact with process materials and/or wastewater.
9. Daily Maximum - The maximum allowable discharge of a pollutant during a calendar day. Where daily maximum limitations are expressed in units of mass, the daily discharge is the total mass discharged over the course of the day. Where daily maximum limitations are expressed in terms of a concentration, the daily discharge is the arithmetic average measurement of the pollutant concentration derived from all measurements taken that day.
10. Director - The Director of the Bureau of Sanitation of the Department of Public Works of the City of Los Angeles or the duly authorized representative thereof.
11. Domestic Septage – The liquid or solid material removed from a private sewage disposal system (PSDS), portable toilet or other holding device that receives only domestic sewage.
12. Domestic Wastewater (Domestic Sewage) – Sanitary wastewater and wastewater generated from household type operations.
13. Establishment - An economic unit, generally at a single physical location, where business is conducted or where services or industrial operations are performed.
14. Facility - All buildings, equipment, structures, and other stationary items which are located on a single site or on contiguous or adjacent sites and which are owned or operated by the same person (or by any person which controls, is controlled by, or under common control with such person) and is authorized by the City of Los Angeles to discharge industrial wastewater to the POTW. A facility may contain more than one establishment.
15. Food Service Establishment - A facility engaged in preparing food for consumption by the public such as, but not limited to, a restaurant, bakery, commercial kitchen, caterer, hotel, school, hospital, prison, correctional facility, or care institution.
16. Four (4) - Day Average – The average of daily values for four consecutive monitoring days.
17. Grab Sample - An individual sample collected in less than 15 minutes, without regard for flow.
18. Gravity Grease Interceptor (GGI) - An approved device with a minimum total volume of 300 gallons that is specifically designed to separate, trap, and hold nonpetroleum fats, oil, and grease (FOG) from an industrial wastewater discharge, and which shall be remotely located from where food is handled, and is identified by the following: volume, a minimum retention time of 30 minutes, baffle(s), a minimum of two compartments, and gravity separation.

19. Hydromechanical Grease Interceptor (HGI) - An approved device that is installed in an industrial wastewater drainage system to separate, trap, and hold nonpetroleum fats, oil, and grease (FOG) from a wastewater discharge and is identified by flow rate, retention time, and separation efficiency. HGI design incorporates, in combination or separately, air entrainment, hydromechanical separation, interior baffling, and internal barriers.
20. Industrial User – A person that has been authorized to discharge industrial wastewater into the City of Los Angeles POTW.
21. Industrial Wastewater - Liquid and any water - carried waste other than domestic sewage. Wastewater generated from household type operations, including, but not limited to dishwashing, laundry, and car washing, performed at commercial establishments for or to support commercial purposes is considered industrial wastewater.
22. Instantaneous Maximum - The allowable maximum concentration determined from the analysis of any discrete or composited sample collected, independent of the industrial flow rate and the duration of the sampling event.
23. Interference - A discharge which alone or in conjunction with a discharge or discharges from other sources both:
 - a) Inhibits or disrupts the POTW, its treatment processes or operations or its sludge processes, use or disposal; and
 - b) Causes a violation of any requirement of the POTW's NPDES permit (including an increase in the magnitude or duration of a violation) or prevents the use of disposal of sewage sludge. The following statutory provisions and regulations or permits issued thereunder apply (or more stringent State or Local regulations): Section 405 of the Clean Water Act, the Solid Waste Disposal Act (SWDA) (including Title II, more commonly referred to as the Resource Conservation and Recovery Act (RCRA) and including State regulations contained in any State sludge management plan prepared pursuant to Subtitle D of the SWDA), the Clean Air Act, the Toxic Substances Control Act and the Marine Protection, Research and Sanctuaries Act.
24. Monthly Average - The maximum allowable value for the average of all observations obtained during one calendar month. Compliance with the monthly average discharge limit is required regardless of the number of samples analyzed and averaged. Therefore, if only one sample is taken during the calendar month, results of the one analysis will be used to determine compliance with the monthly average.
25. Non-Domestic Septage – The liquid or solid material removed from a private sewage disposal system (PSDS) or other sanitation holding device that receives industrial wastewater or a combination of domestic and industrial wastewater.
26. Pass Through - A discharge which exits the POTW into waters of the United States in quantities or concentrations which, alone or in conjunction with a discharge or discharges from other sources, cause a violation of any requirement of the POTW's NPDES permit (including an increase in the magnitude or duration of a violation).
27. Person - Any individual, partnership, co-partnership, firm, company, corporation, association, joint stock company, trust, estate, governmental entity or any other legal entity, or their legal representatives, agents or assigns. The masculine gender shall include the feminine, the singular shall include the plural where indicated by the context.
28. Portable Toilet – Any portable or permanently installed sanitation apparatus or system which includes a tank for toilet waste retention. Portable Toilet includes sanitation holding devices from airplanes, trains, boats with type III marine sanitation devices, buses, movie dressing room trailers, recreational vehicles, or other similar transport vehicles.

29. Private Septage Disposal Facility (PSDF) – A disposal site, other than a City designated discharge location, with a direct connection to the City sewer, which accommodates the discharge of hauled septage.
30. Publicly Owned Treatment Works (POTW) - A treatment works as defined by Section 212 of the Clean Water Act which is owned by the State or municipality. This definition includes any devices and systems used in the storage, treatment, recycling and reclamation of municipal sewage or industrial wastes of a liquid nature. It also includes sewers, pipes and other conveyances only if they convey wastewater to a POTW treatment plant.
31. Resource Conservation and Recovery Act (RCRA) - A Federal statute regulating the management of hazardous waste from its generation through ultimate disposal. The Act contains requirements for waste generators, transporters and owners and operators of treatment, storage and disposal facilities.
32. Sanitary Wastewater – Wastewater of human origin derived from toilets, urinals, showers, baths and restroom sinks.
33. Septage – The liquid or solid material removed from a private sewage disposal system (PSDS), portable toilet or other sanitation holding device that receives wastewater.
34. Septage Hauler – A person or an owner/operator of a business that holds Septage Disposal Permit(s) issued by the Director to discharge septage to the City's P.O.T.W.
35. Slug Discharge - Any discharge of a non-routine, episodic nature, including but not limited to an accidental spill or a non-customary batch discharge, which has a reasonable potential to cause Interference or Pass Through, or in any other way violate the POTW's regulations, local limits or permit conditions.
36. Total Toxic Organics (TTO) - The sum of the masses or concentrations greater than 0.01 mg/l of the specific toxic organic compounds regulated by specific categorical pretreatment regulations which is found in the discharge at specific quantifiable concentrations.
37. Type III Marine Sanitation Device – A device that is designed to prevent the overboard discharge of treated or untreated domestic sewage.
38. Upset - An exceptional incident in which there is unintentional and temporary noncompliance with technology based permit effluent limitations because of factors beyond the reasonable control of the Industrial User, excluding such factors as operational error, improperly designed or inadequate treatment facilities or improper operation and maintenance or lack thereof.
39. Wastewater - Liquid and water - carried industrial and/or domestic wastes and sewage from facilities including, but not limited to, dwellings, commercial buildings, industrial facilities, agricultural activities, hospitals, medical facilities and other institutions, together with other wastes which may be present, whether treated or untreated, which enter the POTW.

APPENDIX A

Fact Sheet

FACT SHEET
Amended Date: 10/18/2017

A. INDUSTRIAL USER INFORMATION

SUNSHINE CANYON LANDFILL
14747 San Fernando Road
Sylmar, CA 91342

IU128862
W-535428

Josh Mills, Environmental Manager
(818) 362-2124

B. DESCRIPTION OF FACILITY OPERATIONS

Sunshine Canyon Landfill is primarily engaged in receiving and processing municipal waste (SIC 4953). The landfill generates various liquid streams at the site including mildly contaminated seep water, leachate, gas system condensate, and gas well liquids. The seep water consists of three different streams which include cutoff wall water, mildly contaminated seep water impacted by the landfill, and subdrain water.

The different liquid streams generated at the landfill are presented below:

1. Gas Well Liquids: Gas well liquids are liquids pumped from the gas extraction wells in order to allow for removal of landfill gas (LFG) from the landfill. The gas condensate is collected at the low points in the gas collection system throughout the site and at the flare stations. The gas well liquids are stored in frac tank storage area and are pumped to the sewer lift station for direct sewer discharge.
2. Condensate: Gas condensate is produced due to the temperature drop that takes place as the LFG is conveyed from the gas extraction wells to the flare stations for combustion. Condensate is pumped to the frac tank storage area and then pumped to the sewer lift station for direct sewer discharge.
3. Seep Water: Spring (Seep) and underdrain water emerges and is collected throughout the landfill area. Seep water contains trace levels of VOCs. Seep Water sources may be treated in the on-site water reuse treatment systems or may be directly discharged. There are three types of Seep Water, each treated separately, as described below.
 - City Seep Water: collected from gravity drains under the old city portion of the landfill.
 - Cutoff Wall Water: subsurface water (groundwater) pumped from area near the front entrance of the site. This stream is similar in characteristics to the Seep Water.
 - Subdrain Water: spring water collected underneath the County landfill, and conveyed by gravity to the front entrance area of the landfill.
4. Leachate: The leachate is collected at the bottom of the lined disposal areas. Extraction pumps convey leachate streams to the treatment systems for on-site water reuse or directly to the direct sewer discharge.

Operation at the facility began in 1958. Sunshine Canyon Landfill operates six days per week and employs 60 personnel.

C. SAMPLE POINT DESCRIPTION/FACILITY FLOW INFORMATION

INDUSTRIAL WASTEWATER PERMIT	SAMPLE POINT	FLOW PER OPERATIONAL DAY (GPD)		DESCRIPTION
		TOTAL	PROCESS	
W-535428	01	300,000	300,000	Secured Sampling Facility is located at the Magnetic Flow meter Vault.
TOTAL		300,000	300,000	----

D. PROCESS UNIT OPERATION/FLOW INFORMATION

PERMIT NUMBER	SAMPLE POINT	PROCESS UNIT OPERATION CODE	PROCESS DESCRIPTION
W-535428	01	LWDB000	Landfill Leachate Collection

E. DILUTION/AUXILIARY OPERATION/FLOW INFORMATION

Sunshine Canyon Landfill does not generate any dilution wastestream that combines with a process wastestream prior to Sample Point 01.

F. FLOW MEASURING DEVICE

Sunshine Canyon Landfill has installed an inline Flow meter totalizer to monitor the wastewater discharge to the City sewer.

G. PRETREATMENT UNIT OPERATION(S)

Process wastewater generated from Gas Well Liquids, Condensate, Seep Water and Leachate flows through an optional on-site treatment system or chlorination. Treatment systems were installed to treat the cutoff water, seep water, subdrain water, and leachate streams; these streams may be treated for use on site for dust control and/or may be directly discharged to the sewer with or without treatment. The gas well liquids and gas system condensate flows do not undergo any pre-treatment and are discharged directly to the City Sewer through Sample Point 01.

INDUSTRIAL WASTEWATER PERMIT W-535428

PRETREATMENT UNIT OPERATION CODE	PRETREATMENT UNIT OPERATION DESCRIPTION
AD0010	ADSORPTION - ACTIVATED CARBON
NE0010	NEUTRALIZATION
0110TR	RECIRCULATION

H. POLLUTION PREVENTION

SUNSHINE CANYON LANDFILL has implemented the following pollution prevention practice(s).

POLLUTION PREVENTION PRACTICE CODE	POLLUTION PREVENTION PRACTICE DESCRIPTION
OPM60	Employee training
OPM70	Housekeeping

I. DISCHARGE LIMITATIONS AND MONITORING REQUIREMENTS

See permit, PART 2 - DISCHARGE LIMITATIONS.
See permit, PART 3 - MONITORING REQUIREMENTS

J. REPORTING REQUIREMENTS

See permit, PART 4 - REPORTING REQUIREMENTS.

K. SPECIAL CONDITIONS

See permit, PART 5 - SPECIAL CONDITIONS.

L. STANDARD CONDITIONS

See permit, PART 6 - STANDARD CONDITIONS.

M. RATIONALE FOR EFFLUENT LIMITATIONS

Sunshine Canyon Landfill does not perform any of the operations covered under the Federal Pretreatment Categorical Standards. However, the Federal definition of Significant Industrial User applies to this facility because the process wastewater generated and discharged is greater than 25,000 gpd. As a result, Sunshine Canyon Landfill is required to comply with 40 CFR 403.12.

Since the total process wastewater from this facility is greater than 25,000 gallons per day, this facility is classified as a Significant Industrial User.

Sample Point 01 is the last point of discharge to the sewer system and the Local Limit applies at this point. One set of limits apply to the discharges from this facility to the City of Los Angeles sewer system: the Local Limits. Therefore, Sunshine Canyon Landfill is required to self-monitor for Local Limits semi-annually.

Prepared By: Jocelyn Carrillo

Date: _____

Reviewed By: Nic Tolentino
IU128862.fst/jnc

Date: _____

APPENDIX B

Attachments

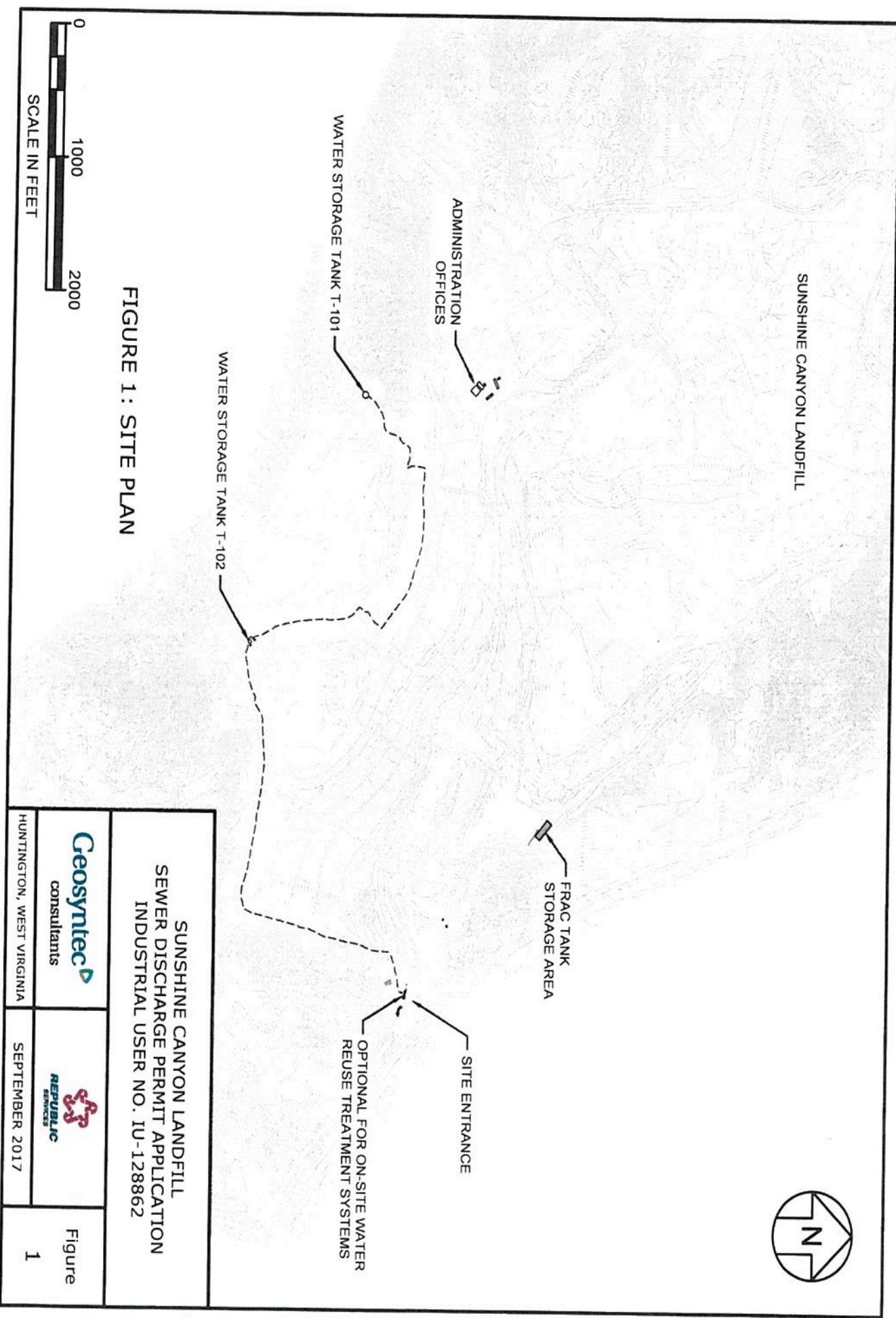


FIGURE 1: SITE PLAN

SUNSHINE CANYON LANDFILL SEWER DISCHARGE PERMIT APPLICATION INDUSTRIAL USER NO. IU-128862		
Geosyntec consultants	REPUBLIC SERVICES	Figure 1
HUNTINGTON, WEST VIRGINIA	SEPTEMBER 2017	

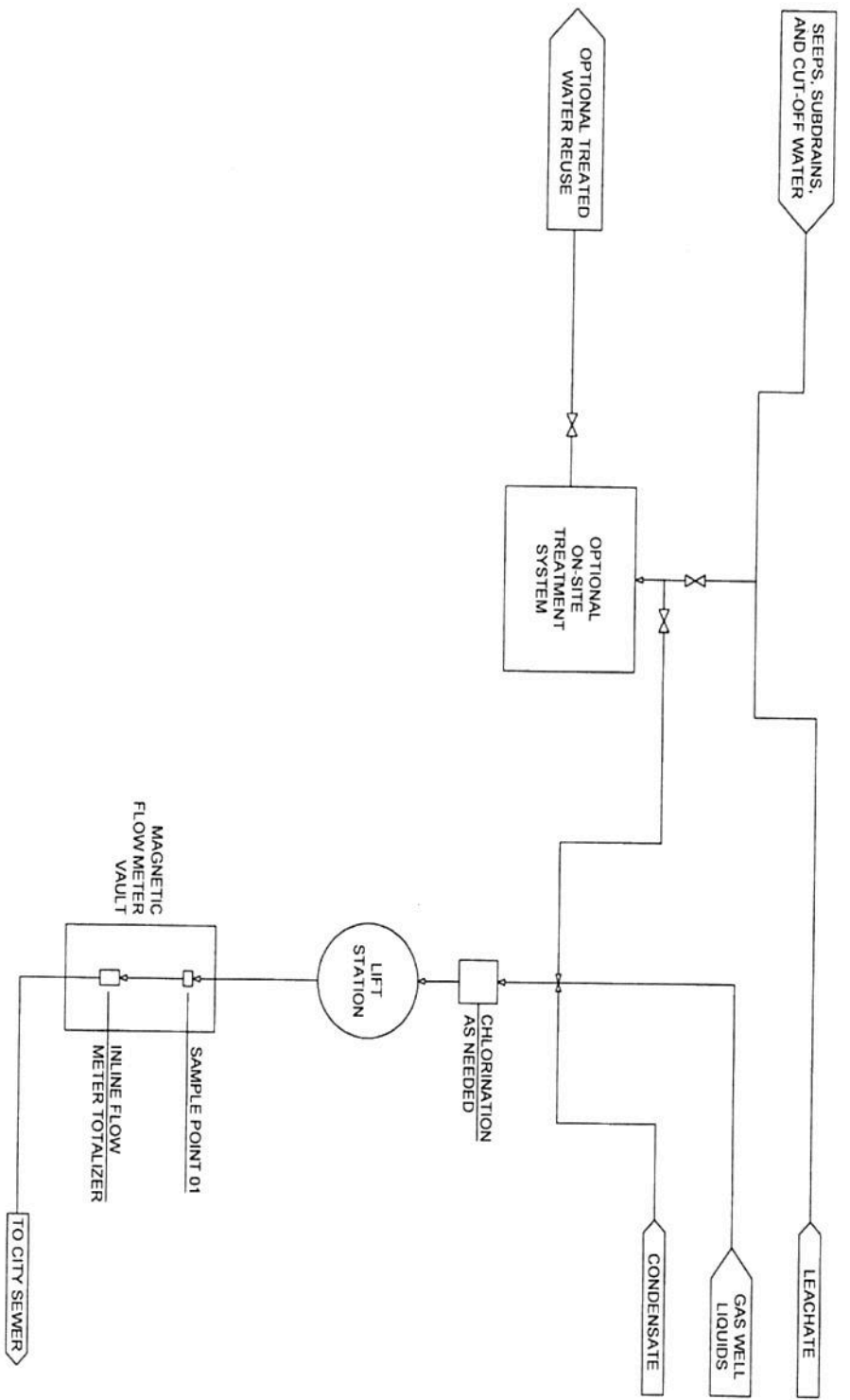


FIGURE 2: SITE LIQUIDS MANAGEMENT PLAN

SUNSHINE CANYON LANDFILL SEWER DISCHARGE PERMIT APPLICATION INDUSTRIAL USER NO. IU-128862		
Geosyntec consultants	REPUBLIC SERVICES	Figure 2
HUNTINGTON, WEST VIRGINIA		
SEPTEMBER 2017		

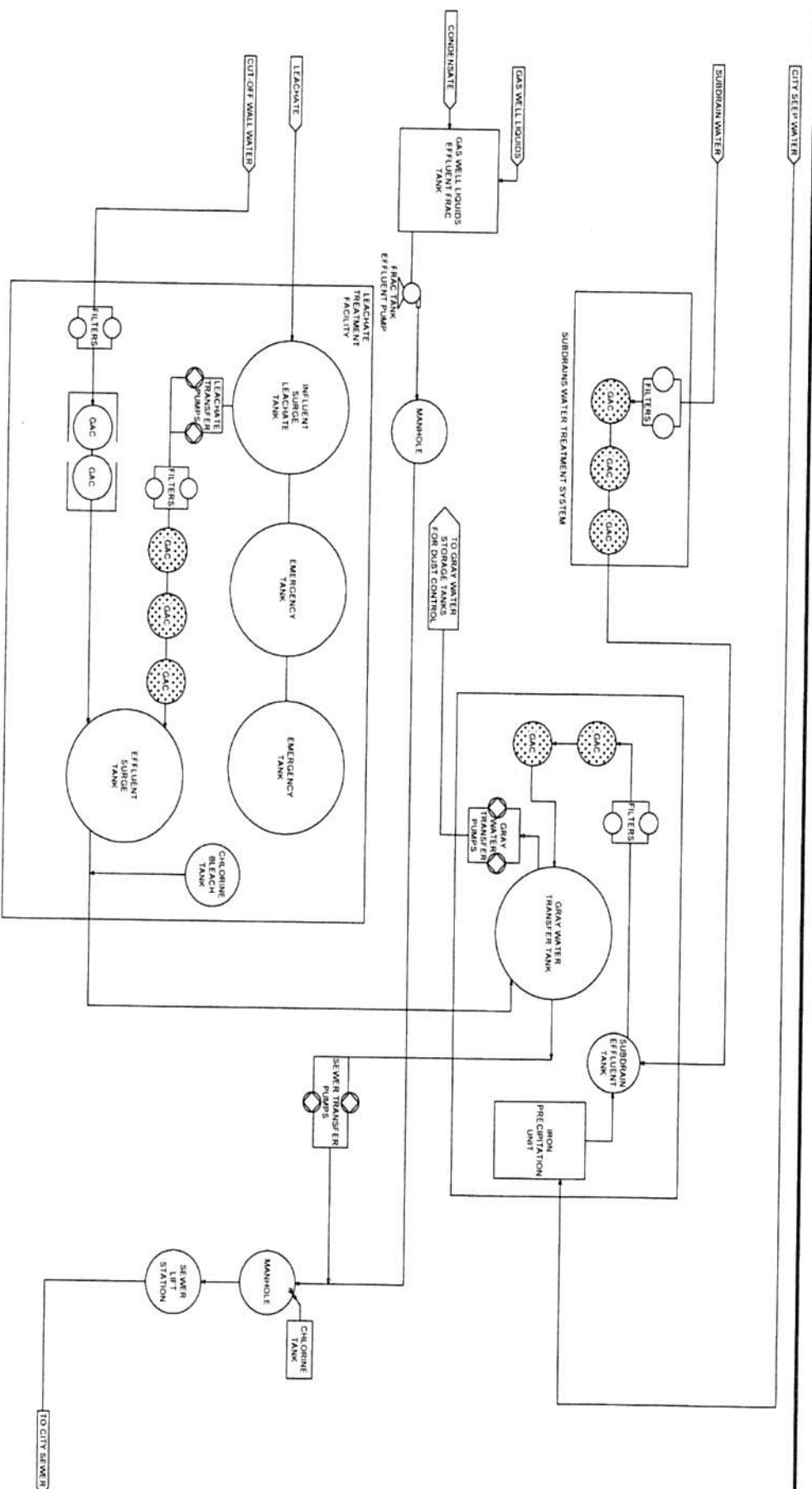


FIGURE 3: PROCESS FLOW SCHEMATIC FOR THE OPTIONAL ON-SITE WATER REUSE TREATMENT SYSTEMS

SUNSHINE CANYON LANDFILL
SEWER DISCHARGE PERMIT APPLICATION
INDUSTRIAL USER NO. IU-128862

Geosyntec
consultants

REPUBLIC
SERVICES

Figure

3

HUNTINGTON, WEST VIRGINIA

SEPTEMBER 2017



SEWER FACILITIES CHARGE (SFC) BONDED AND SPECIAL SEWER CONNECTION CERTIFICATE



City of Los Angeles
Department of Public Works
Bureau of Engineering

JOB ADDRESS: 14747 N SAN FERNANDO ROAD
Applicant Name: REPUBLIC SERVICES, INC
Address: 18500 N ALLIED WAY
City: PHOENIX State: AZ Zip Code: 85054
Phone No.: 818.362.2151

Date Issued: 05/24/2017
Engineering District: Valley
Issued By: Lee Guilbeaux, VALLEY DISTRICT
Tract No.: TR 10422
Lot No.: LT 9
APN: 2601011012
Previous Certificate
Issued: 201481132 2015810613
Sewer Map No.: 225-135-2 228-133-4 228-133-2
Sewer Permit No.: S2014810129
Remarks: SUNSHINE CANYON LANDFILL
INDUSTRIAL WASTE PERMIT W-535428

ID FACILITY DESCRIPTION

SEWER FACILITIES CHARGE CREDIT FLOW AFTER JULY 1, 1994

RATE UNIT

QUANTITY

AMOUNT

SEWER FACILITIES CHARGE FLOW FEE

RATE UNIT

QUANTITY

AMOUNT

ID FACILITY DESCRIPTION

RATE UNIT

QUANTITY

AMOUNT

159708

INDUSTRIAL DISCHARGE

386.00 GPD

182,000.00

\$702,520.00

Subtotal SFC Fee = \$702,520.00

Total SFC Amount Due = \$702,520.00 - \$0.00 = \$702,520.00

BONDED SEWER FEES:

Bonded Sewer Fee = \$74.00 x = \$0.00
Bonded Lateral Fee = \$84.00 x = \$0.00
7% Surcharge for Bonded Lateral Fee = \$0.00
Total Bonded Amount Due = \$0.00

Date:

The following Sewerage Facilities Charges have been paid for the above described property by the above signed in behalf of the owner and succeeding owners in accordance with Sections 64.11.2, 64.11.3, 64.16.1, of the L.A.M.C.

The following Sewer Fees (SPECIAL FEE)(BONDED) House Connection Sewer in accordance with Section 64.15 (B)/64.18 have been paid for (all) (a portion) of the property described above by the above signed in behalf of the owner and succeeding owners.

CERTIFICATE NO.: C-2017810921

CERTIFICATE NO.: D-

Appendix B: Attachment 4 of 6 Page 1 of 1

DBA: SUNSHINE CANYON LANDFILL IU 128862

Permit(s) W- 535428

Sewer Capacity Availability Request (SCAR)

To: Bureau of Sanitation
The following request is submitted to you on behalf of the applicant requesting to connect to the public sewer system. Please verify that the capacity exists at the requested location for the proposed developments shown below. The results are good for 180 days from the date the sewer capacity approval from the Bureau of Sanitation.

Job Address: **14747 SAN FERNANDO RD** Sanitation Scar ID: **60-3563-0317**
Date Submitted: 03/10/2017 Request Will Serve Letter? No
BOE District: Valley District
Applicant: GEO-LOGIC ASSOCIATES, INC
Address: 2777 E GUASTI RD STE 1 City: ONTARIO
State: CA Zip: 91761
Phone: 530-632-1215 Fax: 14042-20000-05291
Email: CBARRETT@GEO-LOGIC.COM BPA No. 228-137-3
S-Map: 350 Wye Map:

SIMM Map - Maintenance Hole Locations

No.	Street Name	U/S MH	D/S MH	Diam. (in)	Approved Flow %	Notes
1	SAN FERNANDO RD	35001001	35001002	18	100.00	

Proposed Facility Description

No.	Proposed Use Description	Sewage Generation (GPD)	Unit	Qty	GPD
1	DEWATERING	1	GPD	300,000	300,000
Proposed Total Flow (gpd):					300,000

Remarks 1] Approved for the maximum allowable capacity of 300,000 GPD.(208.33 gpm). 2] Maximum allowable flow rate will be 250 gpm, not exceeding 300,000 gallons per day. 3] IWP is required.

Note: Results are good for 180 days from the date of approval by the Bureau of Sanitation
Date Processed: 03/13/2017 Expires On:

Processed by:

Bureau of Sanitation
Phone: 323-342-6207
Sanitation Status: SAN Review Completed
Reviewed by: Ricardo Avendano
on 03/13/2017

Submitted by: IRENE CHIA
Bureau of Engineering

Phone:

Fees Collected Yes
Date Collected 03/10/2017

SCAR FEE (W:37 / QC:707) \$2,568.50
SCAR Status: SAN Review Completed

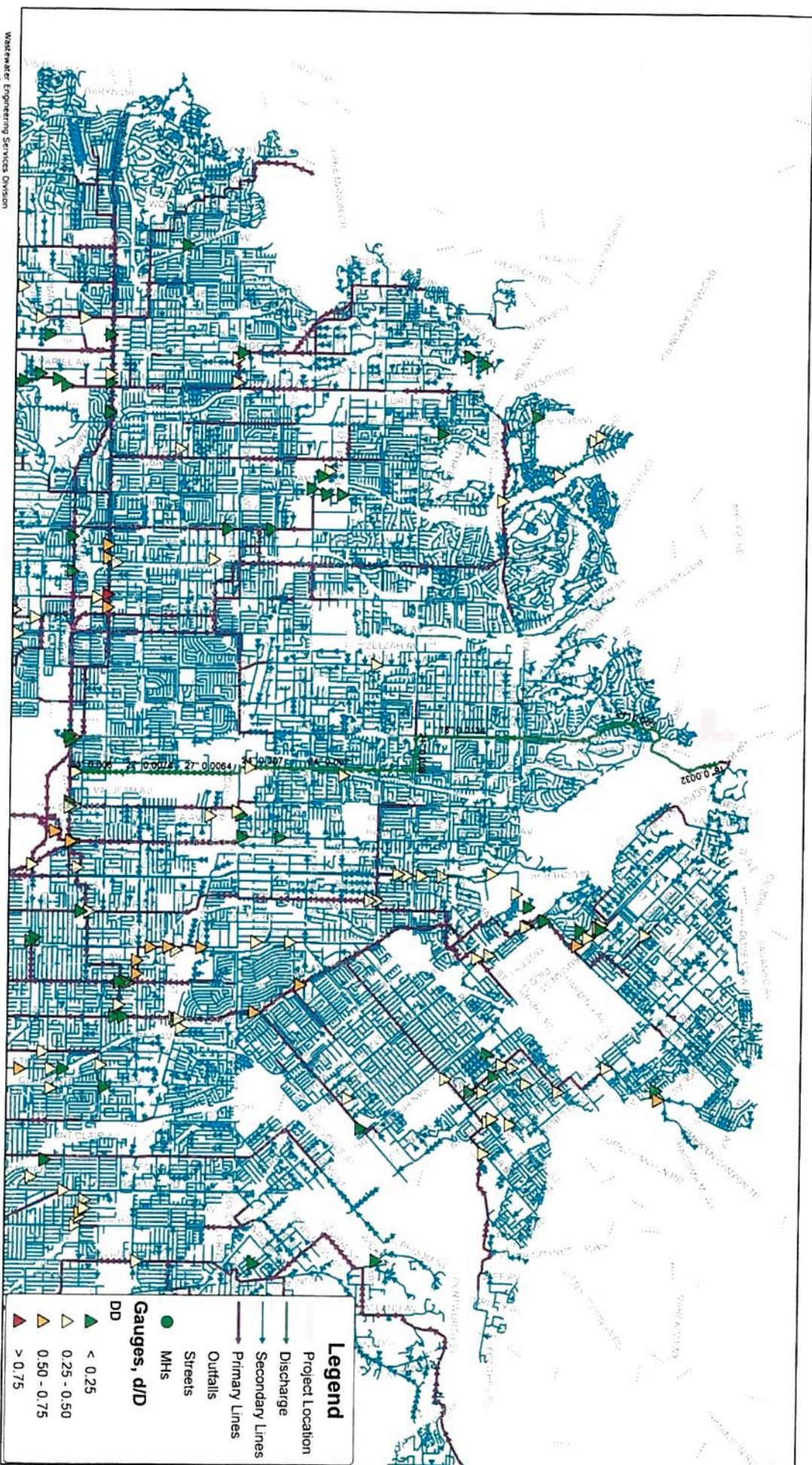


Figure 1
14747 SAN FERNANDO RD.
Sewer Map

APPENDIX C

Self-Monitoring Report Form and Instructions

CITY OF LOS ANGELES BUREAU OF SANITATION				INDUSTRIAL WASTE MANAGEMENT DIVISION PERIODIC COMPLIANCE REPORT				SEND REPORT TO: CITY OF LOS ANGELES INDUSTRIAL WASTE MANAGEMENT DIVISION 2714 MEDIA CENTER DR. LOS ANGELES, CA 90065			
PERMIT W - 535428		IU- 128862		PH.# (818) 362-2096							
DBA: SUNSHINE CANYON LANDFILL						SAMPLE POINT NO.: 01-001					
ADDRESS: 14747 San Fernando Road Sylmar, CA 91342						SAMPLE DESC: End-of-pipe -- Normal Operations					
FLOW INFORMATION											
<u>DAILY FLOWRATES:</u>				<u>AUXILIARY FLOW ON DAY OF SAMPLING:</u>				<u>BATCH DISCHARGE ONLY:</u>			
1) SAMPLE DAY FLOW: _____ GPD, [JM [JE [JC				1) BOILER BLOWDOWN: _____ GPD, [JM [JE [JC				1) NO. OF OPERATIONAL DAYS: _____ DAYS			
2) AVE. FLOW FOR THE MONITORING PERIOD: _____ GPD, [JM [JE [JC				2) NON-CONTACT COOLING: _____ GPD, [JM [JE [JC				2) NO. OF DAYS FOR ACCUM: _____ DAYS			
3) MAX. FLOW FOR THE MONITORING PERIOD: _____ GPD, [JM [JE [JC				3) DEMINERALIZATION/BACKWASH: _____ GPD, [JM [JE [JC				3) DISCHARGE VOLUME: _____ GALLONS			
				4) COOLING TOWER BLEEDOFF: _____ GPD, [JM [JE [JC							
				5) OTHERS,(_____) : _____ GPD, [JM [JE [JC							
SAMPLING INFORMATION											
SAMPLE TYPE	DATE		TIME		SPLIT SAMPLE (Y/N)	* PRE-NOTIFICATION DATE	SAMPLED BY	LABORATORY NAME	LABORATORY CERT. #		
	START	END	START	END							
COMP											
GRAB											
DCC-Discharge Case Condition; TTO-Total Toxic Organic; CN-Cyanide MO-Monthly; BM-BiMonthly; QT-Quarterly; SA-SemiAnnual; AN-Annual; GPD-Gallons Per Day; M-Measured; E-Estimated; C-Calculated; COMP-Compostie; G-Grab; Mg/l-Milligrams Per Liter; PPD-Pounds Per Day						NOTE: *TO PRE-NOTIFY CALL (323) 342-6200. 1. Report must be submitted with U.S. Post Office postmark date by the 15th day of the month following the monitoring period. 2. Facsimiles (faxes) of these reports shall not be accepted.					
FOR OFFICIAL USE ONLY: _____						SMR DATA INPUT BY: _____					
POSTMARK DATE: _____						REVIEWED BY: _____					
RECEIVED DATE: _____						REVIEW DATE: _____					

SELF-MONITORING REPORT FORM INSTRUCTIONS

SECTION I :

FLOW INFORMATION

Report all flows in terms of Gallons Per Day (GPD) unless noted otherwise and check (✓) if the reported flow was (M) Measured, (E) Estimated, or (C) Calculated.

A. DAILY FLOWRATES

A.1 SAMPLE DAY FLOW - Enter the discharge flow *during the sampling period (the day/s the sample was collected)*.

A.2 AVERAGE FLOW FOR THE MONITORING PERIOD - Enter the average daily discharge flow *throughout the monitoring period*. For example, if the report was submitted for the 1st Bi-Monthly monitoring period, the flow should be the average daily flow during the months of January thru February.

A.3 MAXIMUM FLOW FOR THE MONITORING PERIOD - Enter the maximum discharge flow *for a single day throughout the monitoring period*.

B. AUXILLARY FLOW ON DAY OF SAMPLING - Provide a breakdown of the sources of auxillary flows *during the sampling period*. Possible sources are: B.1) Boiler Blowdown; B.2) Non-Contact Cooling; B.3) Demineralizer\ Backwash; B.4) Cooling Tower Bleedoff; and, B.5) Others (specify).

C. BATCH DISCHARGER ONLY - Applies to industrial users that discharge wastewater on a batch basis.

C.1 NO. OF OPERATIONAL DAYS - Enter the number of days that manufacturing has been performed since last batch discharge.

C.2 NO. OF DAYS FOR ACCUMULATION - Enter the number of days the wastewater has been accumulated since last batch discharge.

C.3 DISCHARGE VOLUME - Enter the total volume of wastewater discharged per batch in gallons.

SECTION II :

SAMPLING INFORMATION

A. SAMPLING DATES (COMPOSITE) - Enter the start date and end date for the duration of the composite sampling.

B. SAMPLING TIME (COMPOSITE) - Enter the start time and end time for the duration of the composite sampling.

C. SAMPLING DATE/TIME (GRAB) - Enter the date and time the grab sample was collected.

D. SPLIT SAMPLE (Y/N) - Enter "Y=Yes" if the sample collected is a City split sample. Enter "N=No" if not.

E. PRE-NOTIFICATION DATE - Enter the date the City was pre-notified prior to planned sampling.

F. SAMPLED BY - Enter the name of the person who collected the sample.

G. LABORATORY NAME - Enter the name of the laboratory who performed the analysis.

H. LABORATORY CERT. NO. - Enter the State Certificate Number of the laboratory who performed the analysis.

SECTION III :

LABORATORY TEST RESULTS

A. GRAB SAMPLE DATE/TIME - Enter the same information reported in Section II.C of instruction above.

B. COMPOSITE DATE/TIME - Enter the same information reported in Section II.A and II.B of instruction above.

C. SAMPLE TYPE - Check (✓) whether a composite sample or grab sample was used to analyze the analyte.

D. LABORATORY RESULTS - Enter the result (concentration) of the laboratory analysis and their corresponding units (e.g., mg/l, ppm). **The laboratory report must be submitted along with the self-monitoring report.**

E. VIOLATION - Check (✓) if any of the analytes exceeded the discharge limit. Refer to the discharge limits in Section IV of these instructions or the permit for the analyte of concern.

F. SIGNATURE OF AUTHORIZED REPRESENTATIVE, ETC... - Self Explanatory

SECTION IV :

FEDERAL AND LOCAL DISCHARGE LIMITS

A list of the federal and local discharge limits are attached as a guide for the industrial user to determine discharge violations as noted in Section III.E of instruction above. These pages need not be submitted.

SECTION V :

CERTIFICATES/PRODUCTION DATA

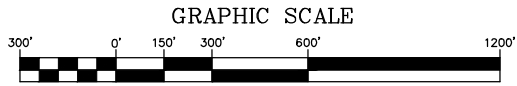
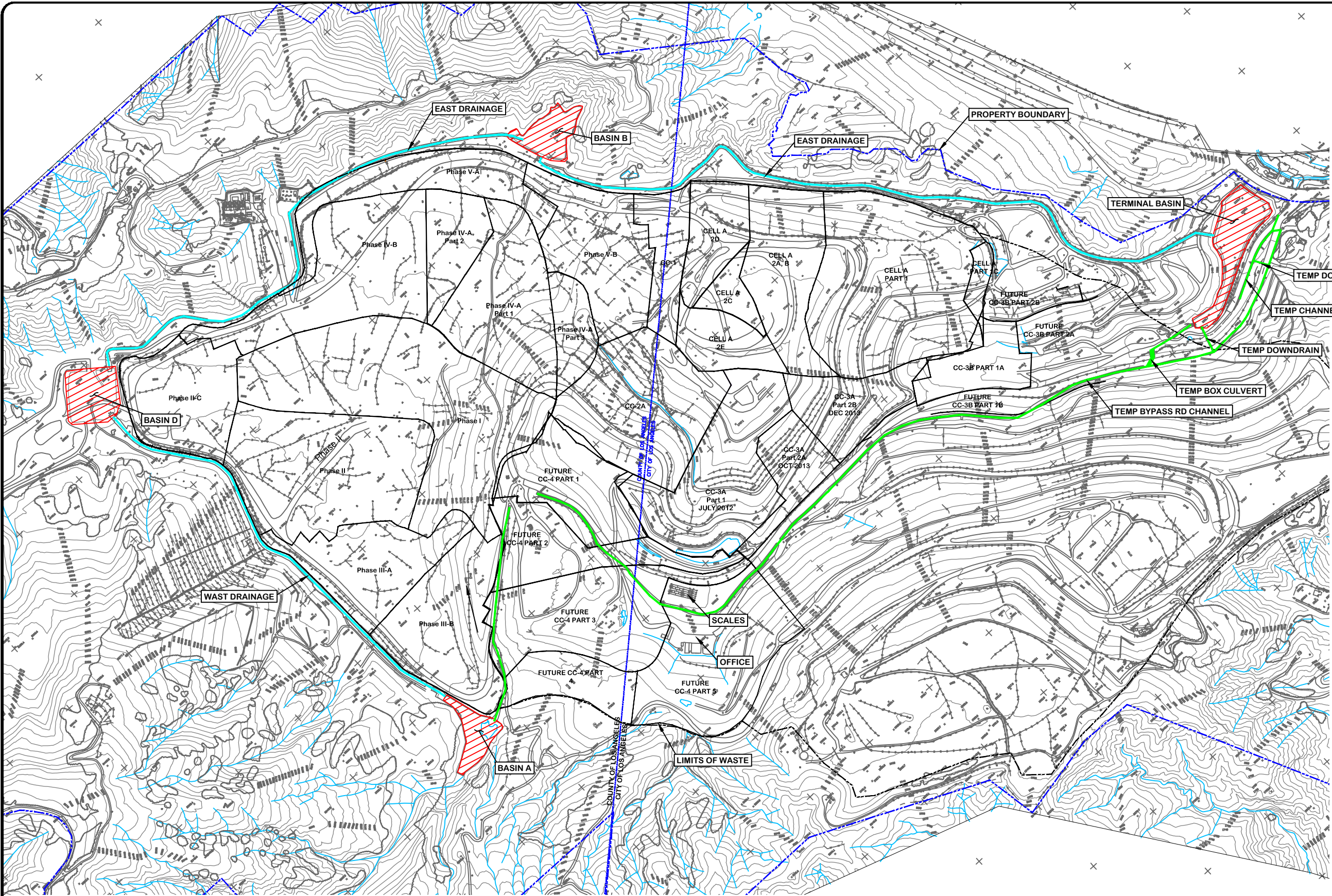
These forms apply to an industrial user (IU) required to submit any of the following: 1) Cyanide Certification, 2) Zero Discharge Certification, 3) TTO Certification, and, 4) Production Data.

A. FROM (date) TO (date) - Enter the inclusive dates (monitoring period) on the form.

B. SIGNATURE OF AUTHORIZED REPRESENTATIVE, ETC.. - Self Explanatory

C. FOR PRODUCTION BASED IU ONLY - Enter the production data during the monitoring period including product description, quantity, and unit.

ATTACHMENT E



LEGEND

- 1500 EXISTING 25 FT CONTOUR
- PROPERTY BOUNDARY
- EXISTING APPROVED LINERS
- LIMIT OF FUTURE WASTE FILL
- PERMANENT DRAINAGE CHANNEL
- TEMPORARY DRAINAGE CHANNEL
- SEDIMENTATION BASIN

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.

FOR REVIEW ONLY
EXISTING TOPOGRAPHY PREPARED BY COOPER AERIAL SURVEYS DATED FEBRUARY 24, 2016

REV. NO.	DATE	DESCRIPTION	APPROVED BY
REV1	DATE1	DESCRIPTION1	DRAWN1
REV2	DATE2	DESCRIPTION2	DRAWN2
REV3	DATE3	DESCRIPTION3	DRAWN3
REV4	DATE4	DESCRIPTION4	DRAWN4
REV5	DATE5	DESCRIPTION5	DRAWN5
REV6	DATE6	DESCRIPTION6	DRAWN6

DATE OF ISSUE: MAY 2016
DESIGNED BY: C. BARRETT
DRAWN BY: C. BARRETT
CHECKED BY: C. BARRETT
APPROVED BY: C. BARRETT



Geo-Logic
ASSOCIATES

2777 E. GUAISTI ROAD
SUITE 1
ONTARIO, CA 91761
(909) 626-2282
www.geo-logic.com



SUNSHINE CANYON LANDFILL
SYLMAR, CALIFORNIA
TAC REPORT
SITE DRAINAGE COMPONENTS

DWG NO.
1
PROJECT NO.
2015.0028

ATTACHMENT F

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 waste 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 down drain, 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

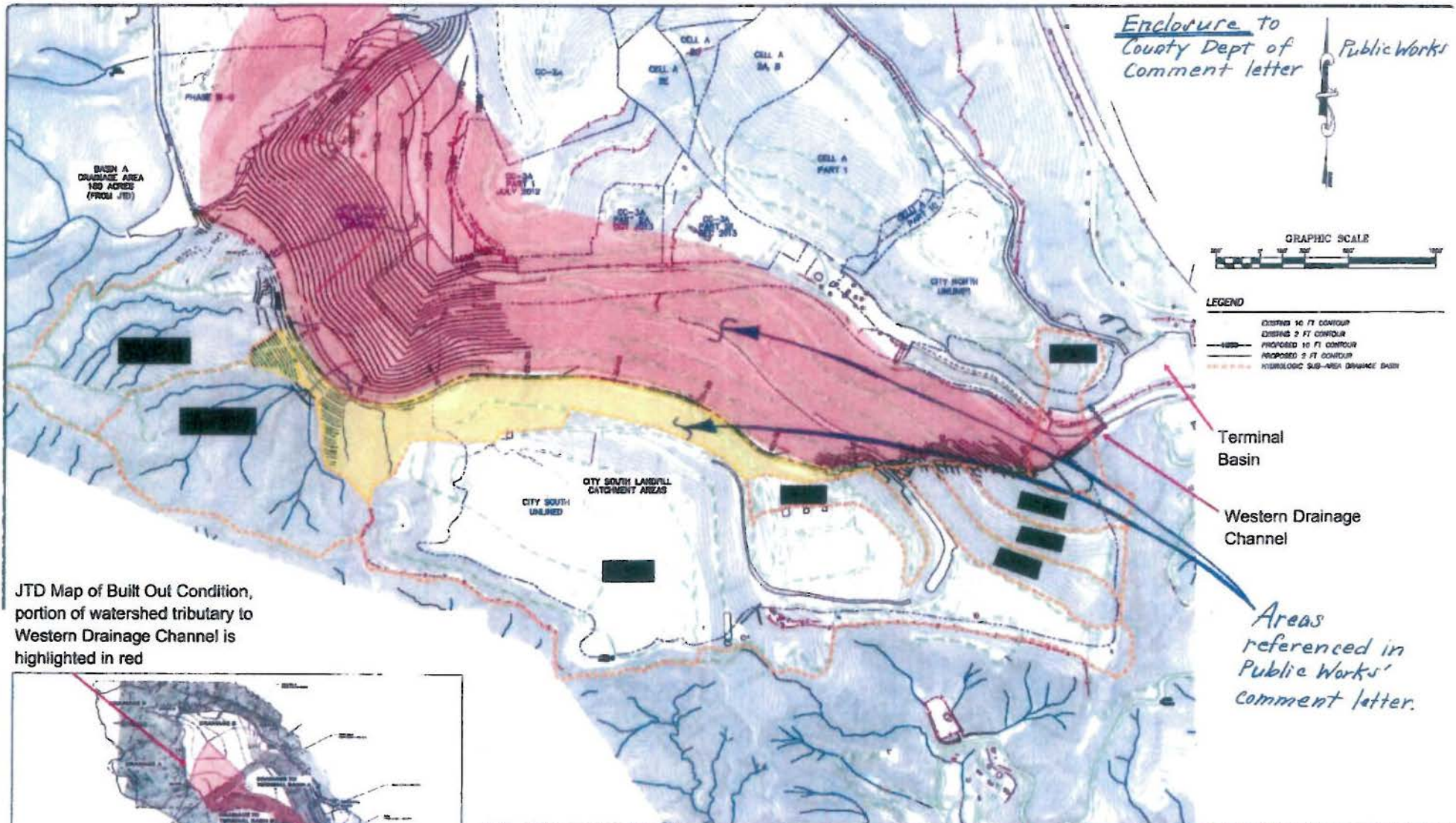


PAT PROANO
Assistant Deputy Director
Environmental Programs Division

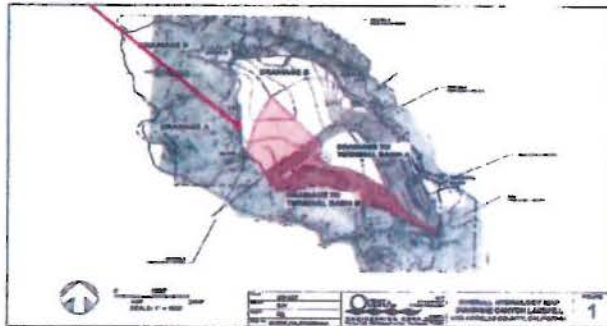
KM:dy
P:\Sec Western Drainage Master Plan

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



<p>REVISION</p> <p>1</p>	<p>Geo-Logic ASSOCIATES</p>	<p>REPUBLIC SERVICES</p>	<p>SUNSHINE CANYON LANDFILL WESTERN DRAINAGE MASTER PLAN SYLMAR, CALIFORNIA DRAINAGE MAP</p>	<p>FIGURE 1 PROJECT NO. 2014-0004</p>
--------------------------	--	-------------------------------------	---	--

2. In respect of the above-stated description,
this is for the use of the project.

ISSUED FOR REVIEW



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 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.

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 others 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.

ATTACHMENT G

SUNSHINE CANYON LANDFILL

October 9, 2017

Mr. David Thompson
SCL LEA – Program Manager
221 N. Figueroa Street
Suite 1250
Los Angeles, CA 90012

Subject: 2017 Annual Wet Weather Preparedness Report and Winter Operations Plan
Sunshine Canyon City/County Landfill (SWFP #19-AA-2000)

Dear Mr. Thompson,

In accordance with Sunshine Canyon City/County Landfill, Solid Waste Facility Permit (SWFP) (Facility #19-AA-2000), Condition 16.I, attached please find the Wet Weather Preparedness Report and Winter Operations Plan for 2017.

As reported in prior years, the goals of the winterization improvements installed at Sunshine Canyon Landfill fall into four categories:

1. Management of sediment by means of constructed measures to minimize suspended solids in the site runoff exiting the terminal basin;
2. Erosion control measures to prevent rainfall and runoff erosion of daily and intermediate soil layers that cover active refuse fill areas with the purpose of preventing storm water contact to buried refuse. This includes grading of soil covers to prevent surface ponding and subsequent storm water infiltration into the existing refuse fill;
3. Maintenance of existing storm water control structures serving both the active and the closed refuse fill areas;
4. Expansion of the runoff control system to meet changing needs of the site due to ongoing fill operations.

Sediment Management and Erosion Control – Categories 1 and 2

Work that has been completed to address sediment management and erosion control include the following items:

- Installed 21 acres of ClosureTurf to provide slope protection on slope areas northeast of the administration buildings (please refer to Drawing 1 and 2 – 2017 Winterization Site Plan Completed Work);
- Applied 37 acres of Posi-Shell to provide slope protection on the slopes east and northeast of the administration buildings (please refer to Drawing 1 and 2 – 2017 Winterization Site Plan Completed Work);
- Inspected Filtrexx compost rolls at the toe of disturbed slopes throughout various areas of the site;
- Track-walked slopes throughout the site to reduce slope erosion and allow establishment of seeded or native vegetation in non-active areas;

- Graded active landfill decks to prevent erosion by avoiding overly steepened swales and decks;
- Graded soil cover in active landfill areas to prevent surface ponding.

Maintenance and Expansion of Runoff Control Systems – Categories 3, 4

- Removal of silt in site basins and channels;
- Cleanout of sediment basin south of cell CC-3B and grading/stabilization of concrete channels leading from this basin to the terminal basin;
- Removal of silt in terminal basin;
- Graded benches to promote positive drainage;
- Cleaned pipes and inlets of vegetation;
- Repaired pipe joints and reset down-drains if required;
- Repaired stormwater channel on City South Deck B to promote positive drainage.

There are several projects that are currently under construction and scheduled for completion by the end of October 2017. All of these projects provide additional stormwater controls:

- A grated road crossing on the paved entry road to the site separates runoff flows from vehicle traffic and provides an opportunity for wheel cleaning to minimize silt track-out will be completed by October 20, 2017;
- A project to install Faircloth Skimmers in the terminal basin to control sediment in stormwater discharge will be completed by October 31, 2017;
- A project to install 57 acres of native vegetation on the interim slopes and top deck of cell CC-3A, the top deck of cell CC-3B, and the County portion of the site will be completed by December 31, 2017 (Drawing 1 and 2 – 2017 Winterization Site Plan Work Underway to Be Completed);
- A project to hydroseed a portion of stockpile area used for egress and ingress for operational activities on the County portion of the site and the slopes southwest of the CC-4 Part 2 cell construction area will be completed by December 31, 2017 (Drawing 1 and 2 – 2017 Winterization Site Plan Work Underway to Be Completed).

The following control systems that were constructed prior to the 2016-2017 wet weather season remain in place as part of the site's overall stormwater management plan:

- Concrete and asphalt lined channels were constructed to replace plastic lined channels along the office road and temporary scale facility;
- A grated road crossing on the paved entry road to the temporary scales separates runoff flows from vehicle traffic and provides an opportunity for wheel cleaning to minimize silt track-out;
- Gabion check dams along the fire road on City South. These check dams will allow for the slowing of stormwater flow allowing sediments to settle;
- Gabion cage wall in terminal basin to slow storm water flow and allow deposition of silt;

The Intermediate Cover Proposal submitted to the South Coast Air Quality Management District (SCAQMD) on March 15, 2017, included a Wet Weather Preparedness plan including actions that would be taken prior to a predicted severe wet weather event. These measures will be taken at least 24 hours prior to the projected on-set of the event. The application of these additional measures will be based on an assessment of the existing site conditions prior to the event and what additional measures will be most effective in minimizing surface erosions. The additional measures may include some or all of the following actions:

- Benches will be cambered at 4% to prevent stormwater from flowing onto slope areas and creating erosion rills;
- Additional fiber rolls/straw wattles will be placed on slope areas at a minimum of twenty vertical feet to slow stormwater flow;
- Application of soil stabilizer containing polymers formulated specifically for stabilization of slopes on appropriate slope areas;
- Construction of additional stormwater control berms as necessary to direct stormwater flow to the appropriate existing on-site structures.

Site inspections will be conducted prior to each rain event to ensure that all controls remain in place and any items that need to be addressed are completed prior to a rain event. Erosion and sediment controls will be assessed after each rain event and any actions needed to repair or replace a control will be addressed.

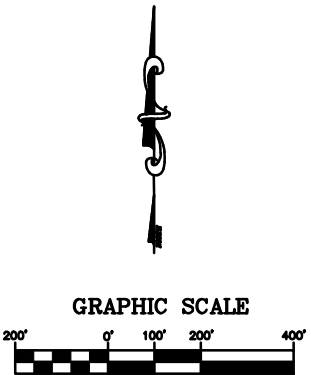
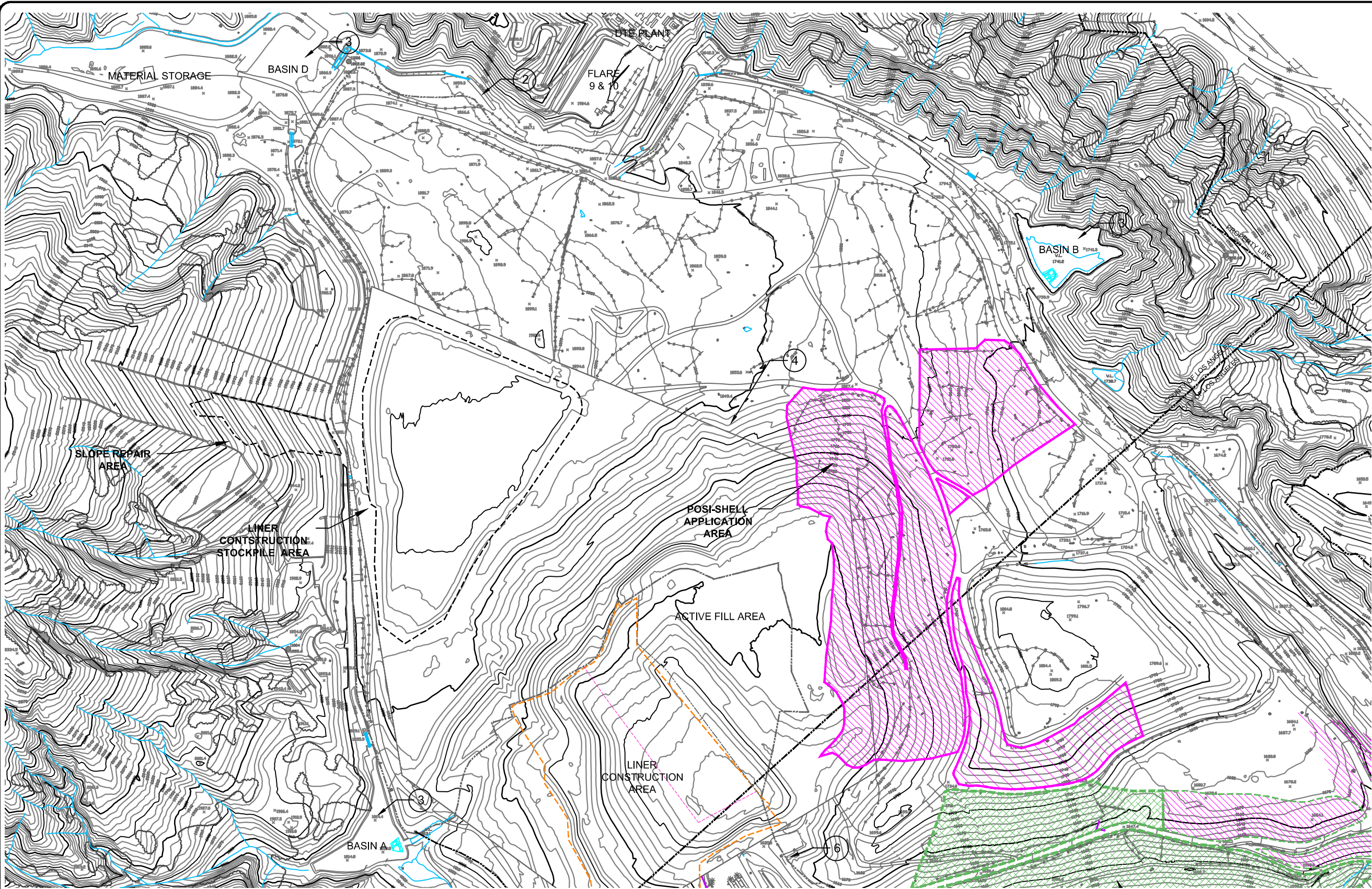
Please do not hesitate to contact me if you have any questions at (818) 362-2075 or PCosta@Republicservices.com.

Sincerely,



Patti K. Costa, P.E.
Environmental Manager

cc: Ms. Dee Lugo, SCL LEA
Dr. Wen Yang, LARWQCB
Mr. Martins Aiyetiwa, LA County DPW
Mr. Wayne Hunter, SCL CAC



- LEGEND**
- PROPERTY LINE
 - LIMIT OF EXISTING WASTE FILL
 - LIMIT OF FUTURE WASTE FILL
 - CONSTRUCTION AREA
 - EXISTING SILT FENCE
 - FILTREXX COMPOST ROLLS
 - FILTREXX CHEVRONS
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 - GABION MATTRESS
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 - K-RAIL
 - GABION CAGE WALL
 - RIP RAP
 - JUTE MAT AND HYDROSEED
 - EROSION CONTROL BLANKET
 - CLOSURE TURF
 - POS-SHELL
 - TURF DEMONSTRATION

- NOTES:**
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 3. Clean out sediment from basin
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 7. Remove all weeds and vegetation in channel
 8. Maintain Gabion check dams

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REV4	DATE4	DESCRIPTION4	DRAWN4
REV5	DATE5	DESCRIPTION5	DRAWN5
REV6	DATE6	DESCRIPTION6	DRAWN6

DATE OF ISSUE: SEPT. 2017
DESIGNED BY: DESIGNED MAIN
DRAWN BY: J. AMAYA
CHECKED BY: CHECKED MAIN
APPROVED BY: R. JOHNSON



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ONTARIO, CA 91761
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2017 WINTERIZATION SITE PLAN
COMPLETED WORK

SUNSHINE CANYON LANDFILL
SYLMAR, CALIFORNIA

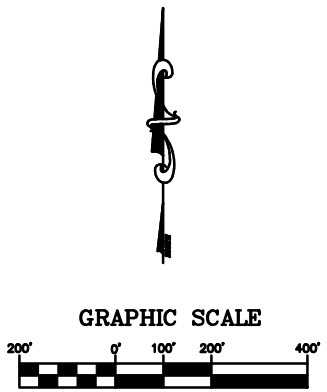
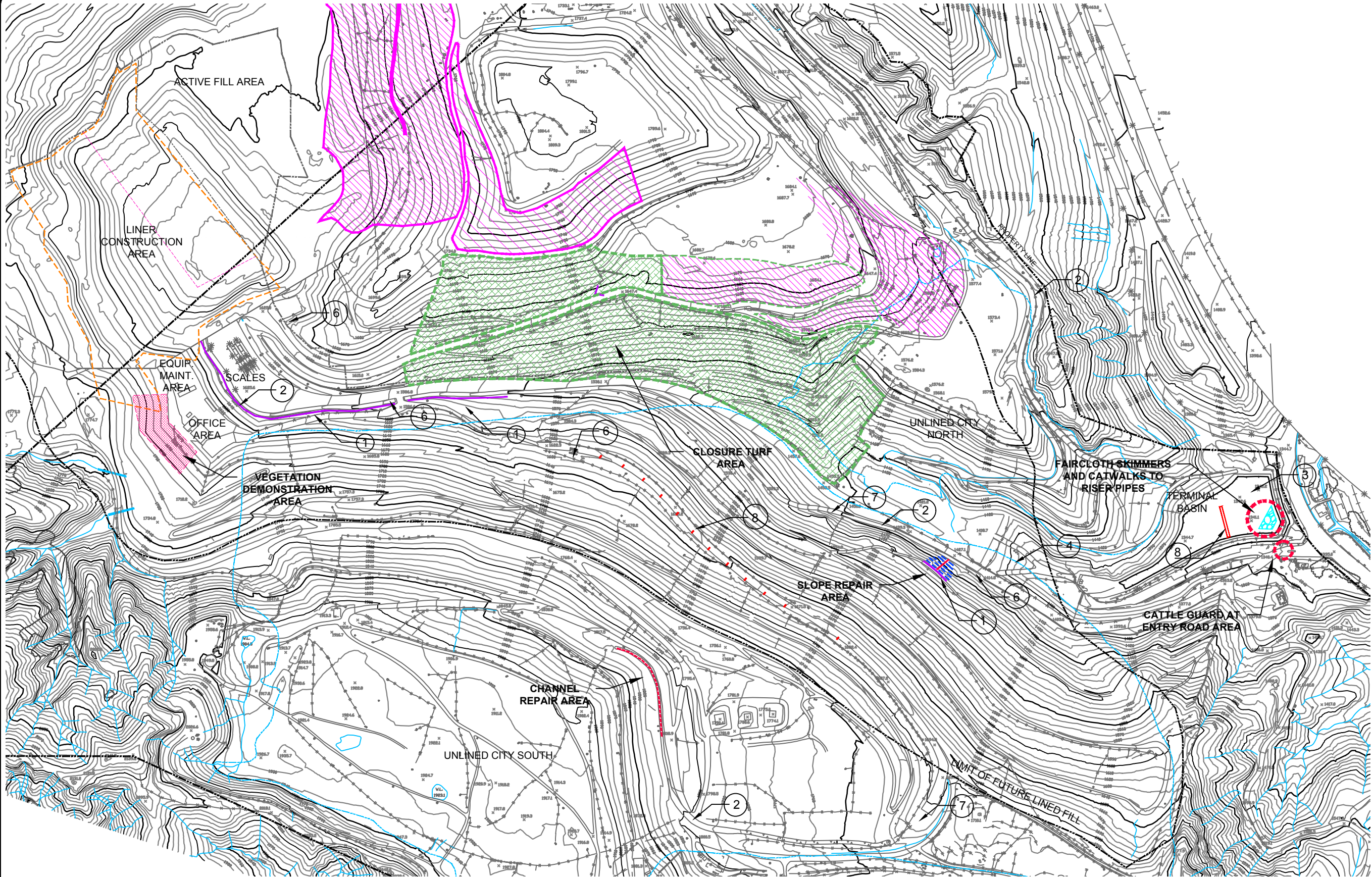
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DWG NO.

1

PROJECT NO.
2017.0002



- LEGEND
- PROPERTY LINE
 - LIMIT OF EXISTING WASTE FILL
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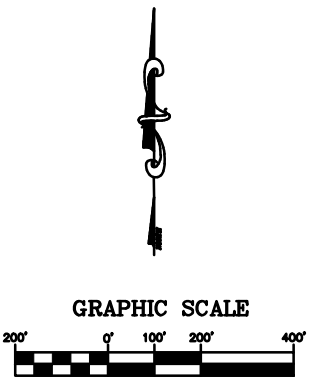
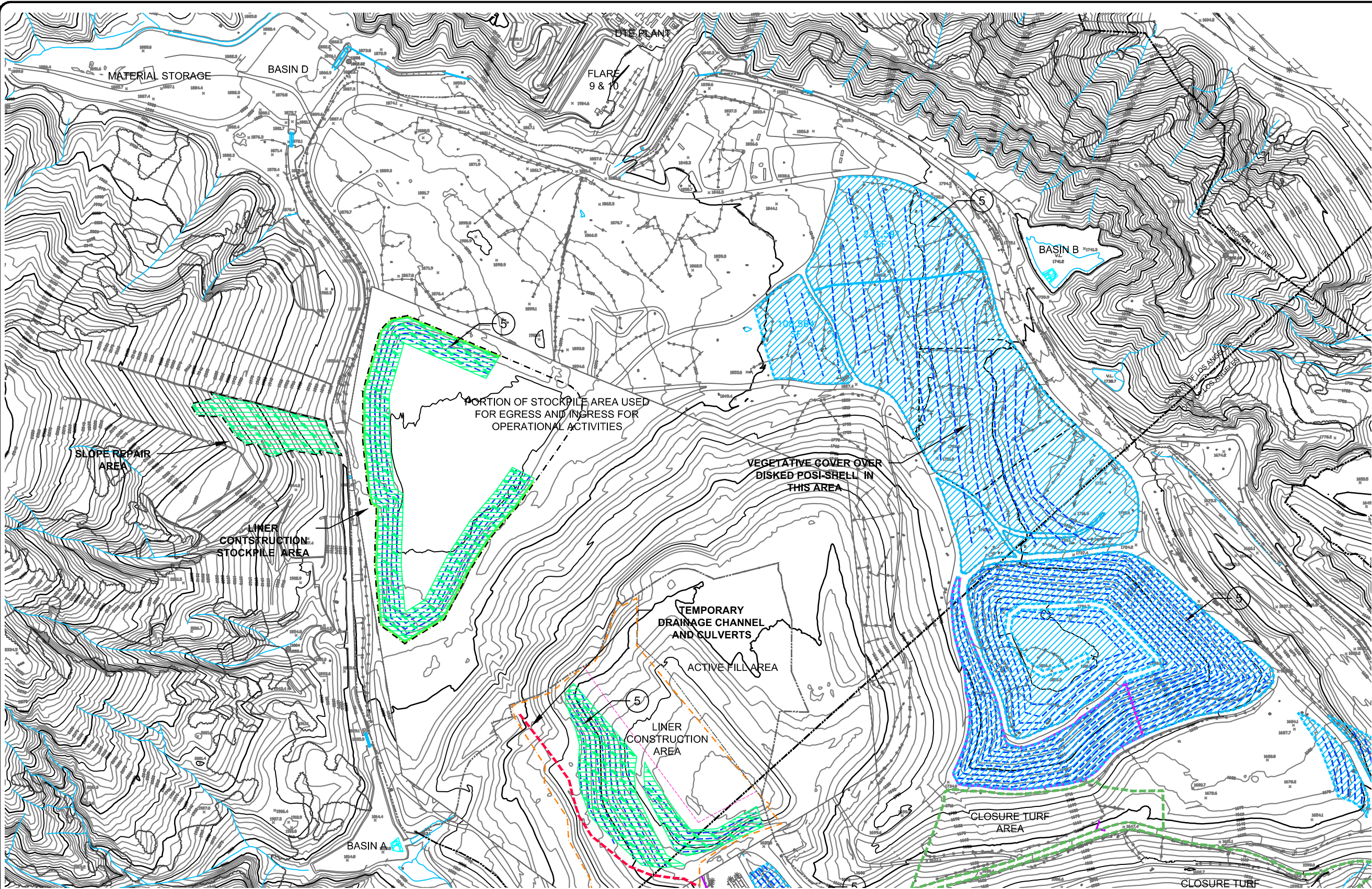
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DWG NO.

2

PROJECT NO.
2017.0002



LEGEND

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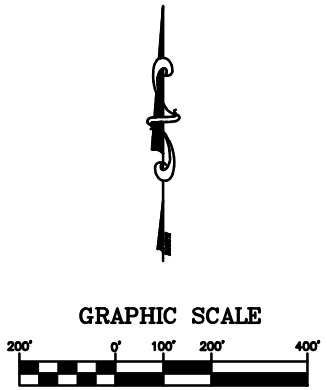
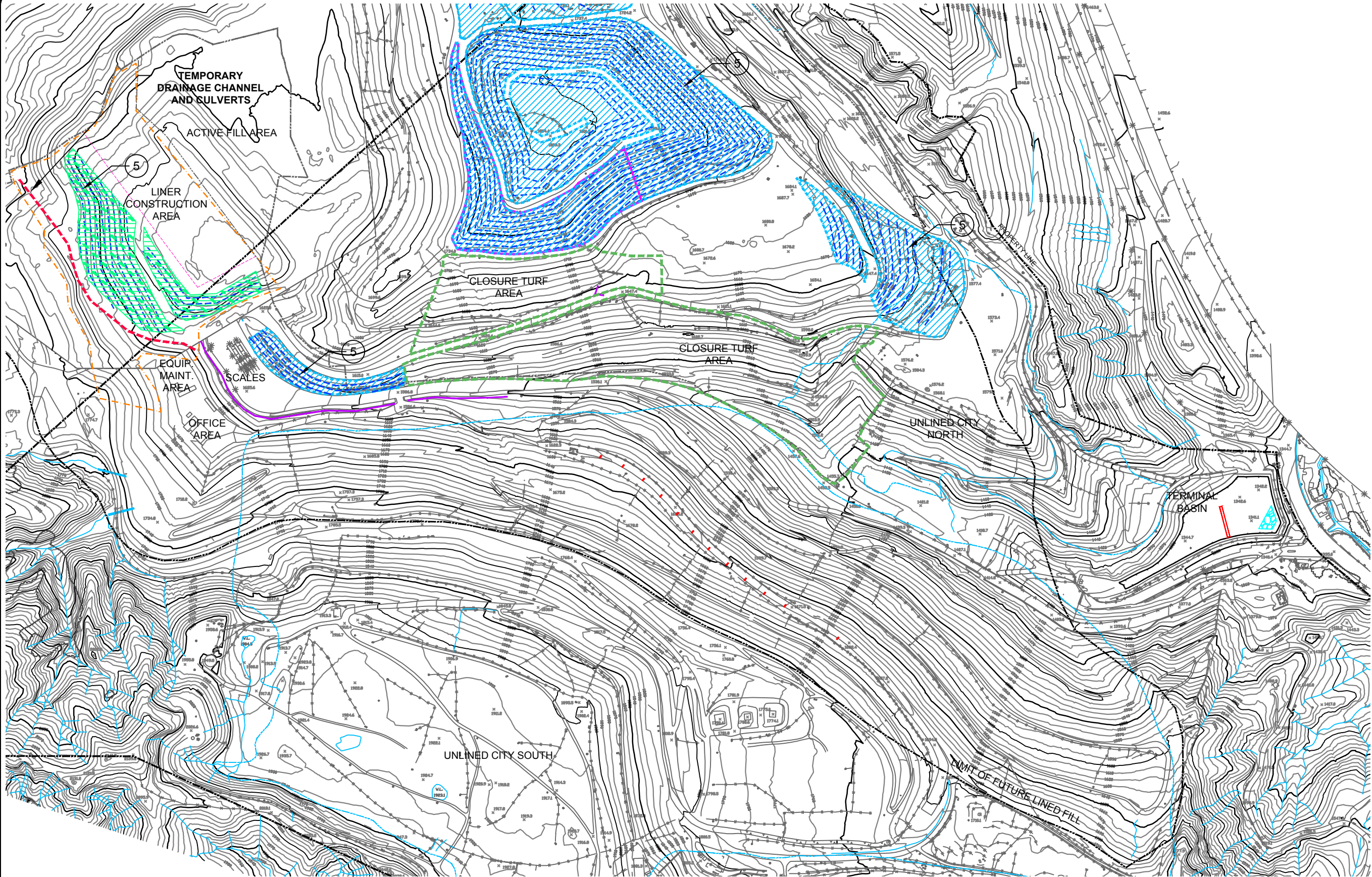


2017 WINTERIZATION SITE PLAN
WORK UNDERWAY TO BE COMPLETED

SUNSHINE CANYON LANDFILL
SYLMAR, CALIFORNIA

SUBMITTAL
ORIGINAL DRAWING SIZE IS 22" X 34"

DWG NO.
1
PROJECT NO.
2017.0002



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 - GABION MATTRESS
 - GRAVEL BAG CHECK DAMS
 - STRAW WADDLES/FIBER ROLLS
 - K-RAIL
 - GABION CAGE WALL
 - RIP RAP
 - JUTE MAT AND HYDROSEED
 - EROSION CONTROL BLANKET
 - VEGETATIVE COVER
 - HYDROSEED

- NOTES:**
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DWG NO.

2

PROJECT NO.
2017.0002

ATTACHMENT H

SUNSHINE CANYON LANDFILL
ODOR MITIGATION MEASURES AND INTERIM MILESTONES
UPDATED NOVEMBER 2017

DESCRIPTION	SCHEDULE	STATUS AS OF 11/15/2017	POSITIVE IMPACTS OR EFFECTS	QUANTIFIABLE BENEFIT	RATIONALE FOR ODOR MITIGATION MEASURE	
LANDFILL GAS MANAGEMENT						
LFG1	2017 installation of new and replacement vertical gas extraction wells					
	153 new and replacement vertical gas wells	March - August 2017	Complete	Increased gas collection	Approximate increase in gas flow =6,200 SCFM @ 50% CH4 (Average gas flow in January 2017 = 11,300 scfm Average gas flow in November 2017 = 17,500 scfm)	New and replacement vertical gas wells installed in areas where gas well monitoring data and surface emission monitoring indicated either (1) inefficient collection of LFG, or (2) surface emissions exceeding SCAQMD Rule 1150.1 requirements. Improvements to the gas collection system infrastructure are designed to increase the overall collection capability and capacity of the system thereby reducing surface emissions and the potential for off-site odors.
LFG2	Installation of Header piping (greater than 12")					
	Closure Turf Project: 1,400 linear feet of 12" pipe 2,750 linear feet of 24" pipe Cells CC3A/CC3B: 3,300 linear feet of 12" pipe 1,350 linear feet of 18" pipe	March - August 2017	Complete	Increased gas collection	Provides available capacity for increased gas flow - see Item LFG1	Improvements to the gas collection system infrastructure are designed to increase the overall collection capability and capacity of the system thereby reducing surface emissions and the potential for off-site odors.
LFG3	Installation of Dewatering Pumps					
	Installation of 210 new pumps in wells affected by liquids	March - August 2017	Complete	Decrease in volume of liquid in individual gas collection wells: Removal of liquids from vertical gas wells will increase volume of gas that can be collected from these wells by removing impediment for gas to flow freely through screened interval.	Over 10 million gallons of liquid has been pumped out of site gas wells since the pump installation program began in 2016. It must be noted that once liquid is pumped out of a well, it is possible that the well may recharge with additional liquids; however, it is also possible that a well will not recharge and therefore the pump may not extract additional liquids from this well location.	Rehabilitation of gas wells by removal of liquids will increase gas collection and decrease potential for surface emissions by restoring efficient gas collection capability to individual wells.
				Decrease in volume of liquid in waste mass: Liquids pumped from gas wells will go to the leachate collection system for treatment and disposal rather than potentially travelling along impervious soil layers to outside slopes causing leachate break-outs and/or draining into vertical gas extraction wells and inhibiting effective well performance.		
				Increase in gas collection: Gas collection capability in individual wells will increase due to liquid removal that could uncover pipe perforations allowing for un-impeded gas flow.		Improvements to the gas collection system infrastructure are designed to increase the overall collection capability and capacity of the system thereby reducing surface emissions and the potential for off-site odors.
LFG4	Leachate Collection System Upgrade					
	Comprehensive upgrade to aboveground liquid collection/discharge system piping for the removal of liquids from vertical gas collection wells. Upgrade includes purchase and installation of new air compressor, design and installation of piping for connection to liquid extraction pumps in wells affected by liquids.	March - December 2017 Additional upgrades planned for January 2018	2017 Upgrades complete	Decrease in volume of liquid in individual gas collection wells: Removal of liquids from vertical gas wells will increase volume of gas that can be collected from these wells by removing impediment for gas to flow freely through screened interval	Over 10 million gallons of liquid has been pumped out of site gas wells since the pump installation program began in 2016. It must be noted that once liquid is pumped out of a well, it is possible that the well may recharge with additional liquids; however, it is also possible that a well will not recharge and therefore the pump may not extract additional liquids from this well location.	Rehabilitation of gas wells by removal of liquids will increase gas collection and decrease potential for surface emissions by restoring efficient gas collection capability to individual wells.
				Decrease in volume of liquid in waste mass: Liquids pumped from gas wells will go to the leachate collection system for treatment and disposal rather than potentially travelling along impervious soil layers to outside slopes causing leachate break-outs and/or draining into vertical gas extraction wells and inhibiting effective well performance		
				Increase in gas collection: Gas collection capability in individual wells will increase due to liquid removal that could uncover pipe perforations allowing for un-impeded gas flow		Increases in the gas collection system infrastructure are designed to reduce the presence of surface emissions and reduce the potential for off-site odors.
LFG5	Flare 11 Installation					
	Design and installation of new, 5,000 SCFM ZULE flare (Flare 11)	October 2017	Complete	Increased site gas collection capacity	Quantifiable benefit: New flare capacity will provide site with overall collection capacity of 23,334 SCFM (Flare1 = 4,167 SCFM, Flare 3 = 4,167 SCFM, Flare 9 = 5,000 SCFM, Flare 10 = 5,000 SCFM, Flare 11 = 5,000 SCFM)	Benefit is realized by providing increase in overall site gas collection capacity ahead of gas curve so capacity is in place as new wells are installed and also as positive results of dewatering program are realized.

**SUNSHINE CANYON LANDFILL
ODOR MITIGATION MEASURES AND INTERIM MILESTONES
UPDATED NOVEMBER 2017**

DESCRIPTION		SCHEDULE	STATUS AS OF 11/15/2017	POSITIVE IMPACTS OR EFFECTS	QUANTIFIABLE BENEFIT	RATIONALE FOR ODOR MITIGATION MEASURE
LFG6	Gabion Installation					
	Design and installation of 9 gabions in CC-4 Part 1 (5 gabions) and CC-4, Part 2 (4 gabions)	CC-4 Part 1 - March 2017 CC-4 Part 2 - October 2017	Complete	Increased site gas collection capacity: Landfill gas can be pulled from the top and bottom of the waste mass	Quantifiable benefit: benefit is realized due to increased ability to capture landfill gas and liquids	Infrastructure designed to allow increases in gas and liquid collection are designed to optimize collection system and to decrease potential for surface emissions
				Increase in liquid collection: Liquids generated as a result of waste decomposition can drain straight down to the leachate collection system without impediment		
SURFACE EMISSION MANAGEMENT/INTERMEDIATE COVER IMPROVEMENTS						
SEM1	Intermediate Cover Enhancement (ICE) Project					
	Study to determine if specific enhancements to areas of intermediate cover are effective in reducing surface emissions	March 2017 - September 2017	Complete - Report of study in progress	Potential mitigation of areas of surface emissions	Enhancements will be evaluated after 6-month pilot study to determine if positive results are realized, e.g. reduction in surface emissions and/or increase in gas collection in wells in areas surrounding pilot study areas.	Potential decrease in number of instantaneous and integrated surface emission "hits" indicating surface emissions and the potential for off-site odors.
SEM2	Additional Soil Placement					
	Placement of an additional 12" of soil on intermediate cover areas with surface emissions	December 2016 - January 2017	Complete	Decrease in potential surface emissions	Reduction in surface emission exceedances.	Potential decrease in number of instantaneous and integrated surface emission "hits" indicating surface emissions and the potential for off-site odors.
SEM3	Closure Turf Project					
	Installation of Closure Turf and associated sub-cap gas collection system over 21 acres of intermediate cover areas	April - August 2017	Complete	Decrease in potential surface emissions	Reduction in surface emission exceedances.	Potential decrease in number of instantaneous and integrated surface emission "hits" indicating surface emissions and the potential for off-site odors.
SEM4	Posi-Shell Placement					
	Installation of Posi-Shell over 38.5 acres of intermediate cover areas	April - August 2017	Complete	Decrease in potential surface emissions	Reduction in surface emission exceedances.	Potential decrease in number of instantaneous and integrated surface emission "hits" indicating surface emissions and the potential for off-site odors.
SEM5	Monthly Surface Emission Monitoring					
	Surface emission monitoring (integrated and instantaneous) conducted on a monthly basis; required on a quarterly basis by SCAQMD Rule 1150.1 To go above and beyond the 10-10-45 day requirement in Rule 1150.1 for re-	On-Going	On-going	Decrease in potential surface emissions: Reducing initial re-monitoring from 10 to 5 days will ensure SEM exceedances are remediated in an expedited manner	Monthly (rather than quarterly) monitoring reveals areas requiring repair to mitigation surface emissions exceeding SCAQMD's Rule 1150.1.	Mitigating surface emissions exceeding SCAQMD's Rule 1150.1 requirements within 5 days rather than the allowed 10 days will potentially reduce the duration an exceedance remains uncorrected.
WORKING FACE ODOR MANAGEMENT						
WF1	Additional Odor Mitigation Equipment					
	Purchase of seven (7) odor mitigation units (Buffalo Monsoons) put into service at the working face. Units use neutralizer mixed with water to create a misting curtain at working face. Units relocated on a daily basis as determined by working face configuration. Operated continuously from 6 AM - 10 AM and at other times as needed	November 2016	Complete	Decrease in the potential for trash-related odors: Increase potential for spraying mist containing neutralizer close to working face area for suppression of odor. Mobile units are easy to move around and place in areas where they can be most effective.	Benefits of using Buffalo Monsoon units will be evaluated. Units are part of the overall program for the mitigation of working face odors.	Use of misting systems near working face is designed to have impact on odor-laden air's ability to migrate off-site
WF2	Direct Application of Neutralizer at Working Face via Dozer					
	Direct application of neutralizer at the working face via sprayers installed on dozers	July 2017	Complete	Decrease in the potential for trash-related odors: Increase potential for spraying mist containing neutralizer directly on waste material as it is processed.	Difficult to quantify benefit as this item is part of overall site plan for odor mitigation.	Direct application to source has better potential to neutralize odors
OPERATIONS AND MAINTENANCE						
OM1	Installation of Bubbler Tubes and Pumps in Gas Wells Affected by Liquids					
	Dedicated bubbler tubes provide effective means for measuring liquid levels in gas wells affected by liquids.	On-going	On-going	Increased gas collection: Dedicated bubbler tubes allows liquid level measurement to be taken without introducing air into the collection system or allowing LFG to vent during liquid level measurement	Benefit of dedicated bubbler tubes is realized by not having to open wellhead to take liquid level measurements	Allows for pro-active measure for monitoring wells affected by liquids. This has the potential to reduce off-site odors by avoiding the need to remove the wellhead.

SUNSHINE CANYON LANDFILL
ODOR MITIGATION MEASURES AND INTERIM MILESTONES
UPDATED NOVEMBER 2017

DESCRIPTION		SCHEDULE	STATUS AS OF 11/15/2017	POSITIVE IMPACTS OR EFFECTS	QUANTIFIABLE BENEFIT	RATIONALE FOR ODOR MITIGATION MEASURE
OM2	Well Integrity Testing					
	Well integrity testing of all 547 vertical gas collection wells that can be inspected by a down hole camera.	Early December 2016 - March 2017	Completed	Increased gas collection: The well integrity testing results have been used as part of the evaluation criteria of the status of existing wells	Quantifiable results related to the number of new gas collection wells installed in 2017. Please refer to LFG1.	Improvements to the gas collection system infrastructure are designed to increase the overall collection capability and capacity of the system thereby reducing surface emissions and the potential for off-site odors.
OM3	Daily - Blower/flare Station Monitoring					
	Gas quality, vacuum, flow rate monitored	On-going	On-going	Provides Data to Ensure System Vacuum: Ensures blowers/flare stations are operating in accordance within specified parameters	Quantifiable benefit: this O&M task ensures there is sufficient vacuum being applied on system to collect landfill gas being generated.	Optimization of the gas collection system is intended to reduce the presence of surface emissions and the potential for off-site odors.
OM4	Weekly Inspections/Monitoring of Condensate Sumps and Vertical Gas Wells Impacted by Liquids					
	All condensate sumps/traps and isolation valves (header, air supply, and condensate or dewatering force main are inspected. All wells with dedicated pumps are inspected and cycle counts recorded Identified issues are addressed immediately	On-going	On-going	Provides Data to Ensure System Components are Functioning Properly: Ensures condensate sumps are operating effectively Ensures liquid removal pumps are functioning properly	Quantifiable benefit: this O&M task ensures the condensate sumps and the liquid removal pumps are functioning properly.	Ensures overall liquid collection system optimization and identification of items that need immediate actions or corrective measures. An example would be inspecting for low spots in piping that could accumulate solids that would disrupt liquid removal.
OM5	Bi-Monthly (2X/Month) Wellfield Monitoring/Tuning					
	All vertical and horizontal LFG wells, LFG collectors, sample ports and soil vapor extraction (SVE) wells are monitored and tuned. In addition, the well casing, wellhead and lateral piping is inspected to ensure all components are tight and functioning properly.	On-going	On-going	Provides Data to Ensure Overall Health of Wellfield: Ensures wells are operating in accordance with NSPS requirements. Monitoring results identify potential issues with wells that require tuning and re-monitoring and/or additional measures.	Quantifiable benefit: this O&M task ensures the wellfield is functioning properly and tuned to collect the maximum amount of landfill gas being generated from the waste mass.	Optimization of the gas collection system is intended to reduce the presence of surface emissions and the potential for off-site odors.
OM6	Construction of Dedicated Pump Maintenance Shop					
	New, dedicated pump maintenance shop	May 2017	Complete	Provides dedicated area where pumps are cleaned, tested, maintained and safely stored so they can be put back into service in a timely manner. Has reduced the need to send pumps off-site for maintenance or repair	Quantifiable benefit: reduction in time to service dewatering pumps and put them back into service.	Allows for pumps to be put back into service expeditiously.
OM7	OM&M Meetings with Site Operations Team					
	Coordination between gas OM&M contractor and site Operations team conducted on a more frequent basis to ensure all parties are informed regarding activities being conducted on gas collection system and gas OM&M contractor is aware of fill plans and any other activities that could impact gas OM&M activities. Daily meeting between gas OM&M Construction Superintendent and site Operations Supervisor to address immediate needs	On-Going	On-going	Provides high degree of communication between the gas OM&M contractor and site Operations team so activities related to gas construction can be coordinated with site daily fill activities. Also provides both the gas OM&M contractor and site Operations team a daily update on activities being conducted so immediate needs can be addressed.	Quantifiable benefits: (1) reduction in time the gas OM&M contractor responds to needs of site Operations team, and (2) the ability of the site Operations team to be fully aware of activities being conducted by the gas OM&M contractor.	Allows for pumps to be put back into service expeditiously.
OM8	Daily Quad Checks					
	Conducted by site gas OM&M contractor at the end of the day to ensure all GCCS components are secure. Site has been divided into quadrants; a technician is assigned to each quadrant for inspection of GCCS components within that quadrant. Records of daily (Monday - Friday) quad checks are submitted to site personnel.	On-Going	On-going	Provides daily (Monday - Friday) inspections of GCCS components before the end of the day to ensure no conditions exist whereby fugitive emissions/odors could have the potential to vent from an open pipe, and no components under vacuum are open such that air can be pulled in and affect the gas quality at the blower/flare station and gas-to-energy plant.	Quantifiable benefits: significant reduction in odor complaints called in to SCAQMD, verified odor complaints and decrease in the issuance of Notices of Violation for nuisance odors.	Provides concentrated inspection on all areas of the landfill on a daily basis so potential odor issues can be addressed before the site closes each day.
OM9	Early Morning On-Site Odor Monitoring					
	Conducted by Republic Services personnel Monday - Friday from 5 AM - 10 AM. Conducted on-site to monitor for odors in early morning hours to determine so any actions that need to be taken to mitigate odors can be done as soon as possible.	On-Going	On-going	Provides daily (Monday - Friday) early morning inspection of entire site to determine if any actions need to be taken to mitigate an odor source. Actions are taken as soon as possible thus reducing the potential for off-site odors.	Quantifiable benefits: significant reduction in odor complaints called in to SCAQMD, verified odor complaints and decrease in the issuance of Notices of Violation for nuisance odors.	Provides early morning monitoring to detect odor sources or potential odor sources so they can be addressed in a timely manner.
OM10	Sunshine Canyon Odor Team					
	Engagement program for all employees to identify odor sources or potential odor sources and report to site supervisors. Encouraging all employees to be responsive and responsible to the need to identify potential odor sources before an issue arises.	On-Going	On-going	Provides daily (Monday - Saturday) input from site employees regarding potential odor sources so they can be addressed in a proactive manner.	Quantifiable benefits: significant reduction in odor complaints called in to SCAQMD, verified odor complaints and decrease in the issuance of Notices of Violation for nuisance odors.	Provides an "all-hands" approach to odor mitigation.

ATTACHMENT I

Figures 1 and 2

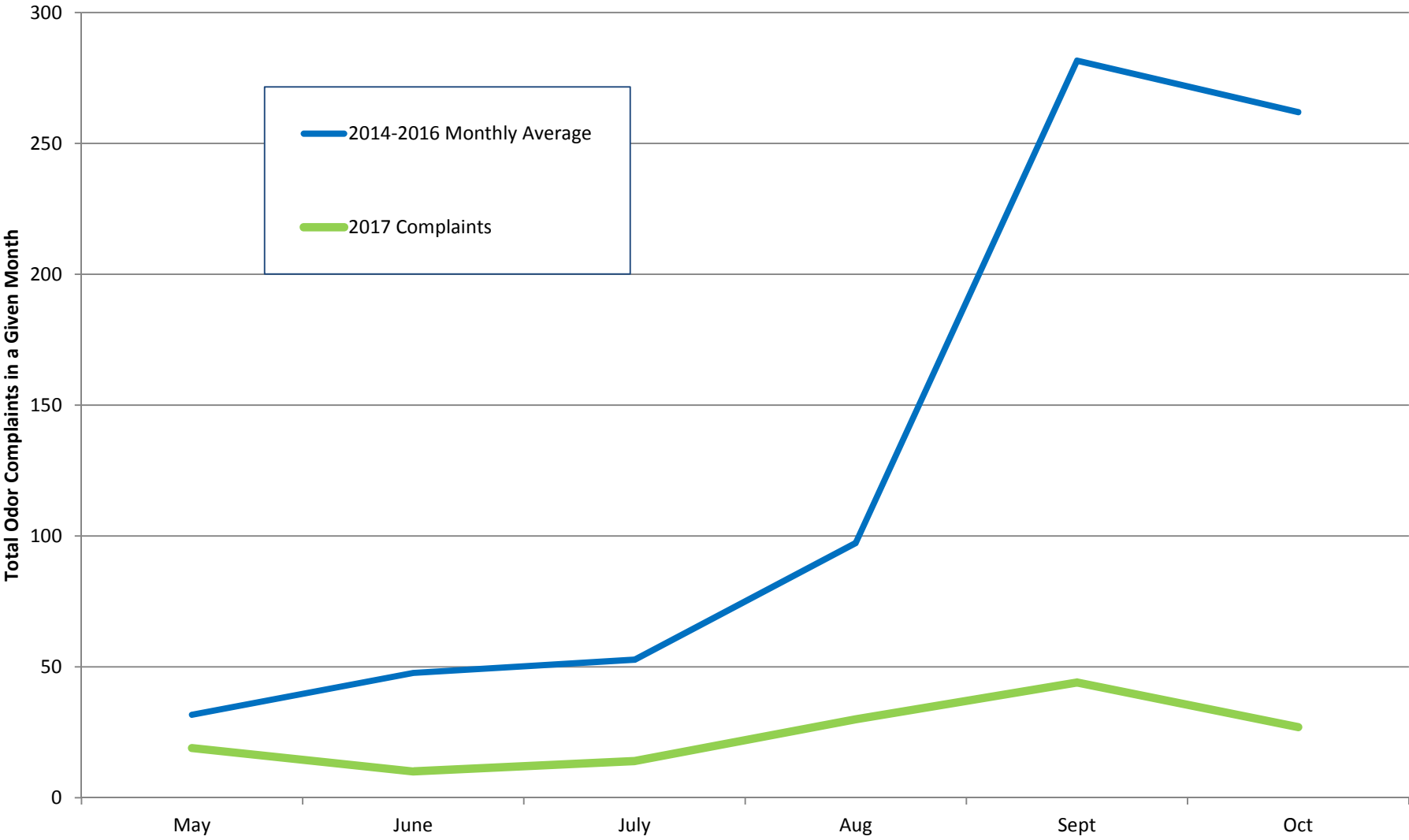
*From November 2, 2017 Presentation
to SCAQMD Hearing Board*

Figure 1



**May Through October
Total Odor Complaints
2014 Through 2017**

Figure 2



ATTACHMENT J

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,

A handwritten signature in black ink that reads "Rob Sherman". The signature is fluid and cursive, with the first name "Rob" and last name "Sherman" clearly distinguishable.

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"

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 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,

A handwritten signature in black ink that reads "Rob Sherman". The signature is fluid and cursive, with the first name "Rob" and last name "Sherman" clearly distinguishable.

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

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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.

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.

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 (SO_4) 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)
City of Los Angeles Planning Department (Nicholas Hendricks, Ly Lam,
Lisa Webber)
North Valley Coalition of Concerned Citizens (Wayde Hunter)
Granada Hills North Neighborhood Council



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

September 27, 2010

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.

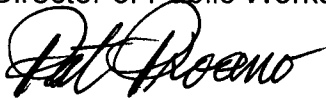
Failure by Republic to implement these corrective measures shall constitute a violation of the CUP and be subject to the penalty provision described in Condition No. 11 of the CUP.

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)

MITIGATION REPORTING AND MONITORING PROGRAM (MRMP)
SUNSHINE CANYON LANDFILL - CITY OF LOS ANGELES
INCORPORATED AS CONDITIONS OF APPROVAL PURSUANT TO [Q] CONDITION NO. A.7
(Based on Table 7.4-1 (Revised 2/11/99, 10/20/99, 10/26/99) Final SEIR 91-0377-ZC/GPA)

Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
4.1 EARTH RESOURCES			
4.1.1 Grading Activities			
1. All grading activities shall be performed in accordance with the provisions of Division 70 of the City of Los Angeles Building Regulations, CCR Title 14, and with the rules and regulations as established by the City Department of Building and Safety.	Project Proponent	Throughout landfill operations and on an on-going basis.	Monitoring Agency: LARWQCB, CIWMB, City LEA, City B&S, and City BOE Enforcement Agency: LARWQCB, CIWMB, City B&S, City LEA, and City BOE
2. Areas outside of and above the cut and fill as shown on the conceptual grading plan shall not be graded, except for the development of ancillary facilities or other related improvements. Additional grading may be necessary for slope stability or drainage purposes. Prior to undertaking any grading activities, the Department of Building and Safety shall be notified and approve any additional grading based on engineering studies (in accordance with CCR Title 14) provided by the project proponent and independently evaluated by the Department of Building and Safety.	Project Proponent	Throughout landfill operations and on an on-going basis.	Monitoring Agency: LARWQCB, CIWMB, City LEA, and City B&S Enforcement Agency: LARWQCB, CIWMB, City B&S, City LEA, and City BOE
3. During excavation, any unsuitable material encountered below the base grade for the landfill, including alluvium, organic material, and landslide debris, shall be removed. Engineered compacted fill shall be placed in those areas to restore the base grade for liner system construction. Excess material not used immediately for cover material shall be stockpiled onsite for future use. The unsuitable material shall be excavated, a portion at a time, as the working area of the landfill progresses to avoid opening large sections of potentially unstable material. A buffer area (i.e., 50-100 horizontal feet or as deemed appropriate to maintain safe working conditions) shall be used between the active cells receiving waste and areas under excavation. In accordance with CCR Title 14 a certified engineering geologist shall delineate the limits of the unsuitable material and associated "backcuts" to facilitate removals during excavation. Removal shall not occur during the rainy season (October 1 - April 30) or when the ground is saturated unless performed under the direction and specifications of a certified engineering geologist.	Project Proponent	Throughout landfill operations and on an on-going basis.	Monitoring Agency: LARWQCB, CIWMB, City LEA, City B&S, and City BOE Enforcement Agency: LARWQCB, CIWMB, City B&S, City LEA, and City BOE
4. Grading that allows for construction of ancillary facilities outside of the landfill footprint or that has the potential to impact property beyond the boundary of the landfill shall be approved by the Department of Building and Safety.	Project Proponent	Throughout landfill operations and on an on-going basis.	Monitoring Agency: LARWQCB, CIWMB, and City B&S Enforcement Agency: LARWQCB, CIWMB, and City B&S
5. All grading activities shall be in compliance with specific requirements provided in a comprehensive geotechnical report prepared specifically for the proposed project, including provisions for excavation approved by the Department of Building and Safety, City Engineer, City LEA and other Responsible Agencies.	Project Proponent	Throughout landfill operations and on an on-going basis.	Monitoring Agency: LARWQCB, CIWMB, City LEA, City B&S, and City BOE Enforcement Agency: LARWQCB, CIWMB, City B&S, City LEA, and City BOE

Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
6. Revegetation and erosion control procedures on all exposed slopes shall be implemented. The erosion controls to be implemented at the site shall include soil stabilization measures and revegetation in accordance with the approved revegetation plan as approved by the City Building and Safety Department. Interceptor ditches shall be designed to divert storm runoff to a sedimentation basin.	Project Proponent	Throughout landfill operations and on an on-going basis.	Monitoring Agency: LARWQCB, CIWMB, and City LEA ,and City B&S Enforcement Agency: LARWQCB, CIWMB, and City LEA, and City B&S
7. Prior to the initiation of grading activities, the project proponent shall undertake, if necessary, reabandonment procedures as required by the California Department of Conservation, Division of Oil, Gas, and Geothermal Resources.	Project Proponent	Throughout landfill operations and on an on-going basis.	Monitoring Agency: California Dept. of Conservation Enforcement Agency: California Dept. of Conservation
4.1.2 Geologic Hazards - Mudflow and Landslide (including lithologic history)			
8. When excavating for the landfill operation, if a landslide is encountered, all material constituting that landslide shall be removed. Excess landslide material not used immediately for cover material shall be stockpiled onsite for future use. If necessary, the landslide area shall be excavated a portion at a time to avoid opening large sections of potentially unstable material. A buffer area shall be maintained between the active landfill cells receiving waste and areas under excavation to remove overburden soils, landslide debris, and weathered bedrock. A qualified geologist shall delineate the limits of the landslide during excavation. Landslide removal shall not commence when the ground is saturated, unless removed under the direction and specifications of a certified engineering geologist.	Project Proponent	Throughout landfill operations and on an on-going basis.	Monitoring Agency: LARWQCB, CIWMB, -City B&S, and City BOE Enforcement Agency: LARWQCB, CIWMB, City B&S, and City BOE
9. Areas of excavation and areas of loose soil (i.e., around haul roads, etc.) shall be stabilized to prevent erosion before the onset of the rainy season.	Project Proponent	Throughout landfill operations and on an on-going basis.	Monitoring Agency: LARWQCB, CIWMB, City LEA, City B&S, and City BOE Enforcement Agency: LARWQCB, CIWMB, City LEA, City B&S, and City BOE
4.1.3 Geologic Hazards - Subsidence			
Refer to Section 4.1.2, Geologic Hazards - Mudflow and Landslide.			
4.1.4 Geologic Hazards - Seismicity			
10. The landfill facility shall be designed and constructed to meet CCR, Title 14, Division 7, Chapter 3, Article 7.8, § 17777 (Final Site Face) and CCR, Title 23, Division 3, Chapter 15, Article 4, § 2547 (Seismic Design) requirements “to withstand the maximum probable earthquake without damage to the foundations or to the structures which control leachate, surface drainage, erosion, or gas.” Design consideration shall include strong ground shaking and secondary ground rupture. In addition, the project proponent shall comply with RCRA, Subtitle D, 40 CFR Part 258, Subpart B, § 258.13 (Fault Areas) which states “new municipal solid waste landfill units and lateral expansions shall not be located within 200 feet (60 meters) of a fault that has had displacement in Holocene time . . .” The landfill design and seismic analysis will be reviewed by the RWQCB.	Project Proponent	Prior to commencement of landfill development.	Monitoring Agency: LARWQCB, CIWMB, City LEA, City B&S, and City BOE Enforcement Agency: LARWQCB, CIWMB, City B&S, City LEA, and City BOE
11. An operations checklist shall be used by a registered engineering geologist for surveys following all earthquake events measuring 5.0 on the Richter Scale or greater near the project site. A comparison of operating parameters and site conditions before and after major earthquake events shall be made to verify that systems are operational as designed. Final designs for major engineered	Project Proponent	After earthquake events of 5.0 magnitude or greater.	Monitoring Agency: SCAQMD, LARWQCB, CIWMB, City B&S, and City BOE Enforcement Agency: SCAQMD, LARWQCB, CIWMB, City B&S, and City

Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
structures shall be based on the results of the detailed stability analyses of potential seismic events.			BOE
4.1.5 Geologic Hazards - Liquefaction			
12. Alluvium in the canyon bottoms beneath the footprint of the waste containment system and beneath ancillary structures shall be excavated and, if necessary, replaced with compacted structural fill during construction. A qualified geologist shall be onsite during construction activities to observe removal and replacement of alluvium and verify that all alluvium within the landfill footprint has been removed prior to placement of any compacted fill or construction of any containment system elements.	Project Proponent	Prior to commencement of landfill development.	Monitoring Agency: LARWQCB, CIWMB, City B&S, and City BOE Enforcement Agency: LARWQCB, CIWMB, City B&S, and City BOE
13. The landfill facility shall be designed and constructed in accordance with RCRA, Subtitle D, 40 CFR, Part 258, Subpart B, § 258.14 (Unstable Areas) so that there would be no liquefaction related impacts.	Project Proponent	Prior to commencement of landfill development.	Monitoring Agency: LARWQCB, CIWMB, City B&S, and City BOE Enforcement Agency: LARWQCB, CIWMB, City B&S, and City BOE
14. The landfill facility shall be designed and constructed in accordance with CCR, Title 23, Division 3, Chapter 15, Article 3, § 2530(d) (Classification and Siting Criteria), which requires that "all containment structures at waste management units shall have a foundation or base capable of providing support for the structures and capable of withstanding hydraulic pressure gradients to prevent failure due to settlement, compression, or uplift as certified by a registered civil engineer or certified engineering geologist."	Project Proponent	Prior to commencement of landfill development.	Monitoring Agency: LARWQCB, CIWMB, City LEA, City B&S, and City BOE Enforcement Agency: LARWQCB, CIWMB, City B&S, and City BOE
4.1.6 Geologic Hazards - Slope Stability			
15. Final maximum refuse slope gradient at the site shall be no steeper than 2H:1V (horizontal to vertical) for the landfill.	Project Proponent	Prior to commencement of landfill development.	Monitoring Agency: LARWQCB, CIWMB, City LEA, City B&S, and City BOE Enforcement Agency: LARWQCB, CIWMB, City LEA, City B&S, and City BOE
16. Final cut and fill slopes shall have an overall slope gradient no steeper than 1.5H:1V.	Project Proponent	Prior to commencement of landfill development.	Monitoring Agency: LARWQCB, CIWMB, City LEA, City B&S, and City BOE Enforcement Agency: LARWQCB, CIWMB, City LEA, City B&S, and City BOE
17. Final slopes shall be engineered to have a static factor of safety of at least 1.5.	Project Proponent	Prior to commencement of landfill development.	Monitoring Agency: LARWQCB, CIWMB, City LEA, City B&S, and City BOE Enforcement Agency: LARWQCB, CIWMB, City LEA, City B&S, and City BOE
18. Survey monuments shall be installed around the perimeters of the outer fill areas at points where they would not be subject to disturbance by landfill development and marking the 500 foot setback from the more restrictive zone. The exact spacing, location, and characteristics of the survey monuments shall be submitted to and approved by the City Local Enforcement Agency (LEA).	Project Proponent	Prior to commencement of landfill development.	Monitoring Agency: LARWQCB, CIWMB, City LEA, and City BOE Enforcement Agency: LARWQCB, CIWMB, City LEA, and City BOE
4.2 AIR QUALITY			
4.2.1 Existing Conditions			
Refer to Section 4.2.11, Construction, within this table.			

Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
4.2.2 California's SCAB Regional Climatic Characteristics Refer to Section 4.2.11, Construction, within this table.			
4.2.3 Criteria Air Pollutants Refer to Section 4.2.11, Construction, within this table.			
4.2.4 Ambient Air Quality Standards and Annual Statistics Refer to Section 4.2.11, Construction, within this table.			
4.2.5 Air Quality Management Plan Refer to Section 4.2.11, Construction, within this table.			
4.2.6 Proposed Project Overview Refer to Section 4.2.11, Construction, within this table.			
4.2.7 Site Preparation/Construction Phase Refer to Section 4.2.11, Construction, within this table.			
4.2.8 Air Quality Operational Phase (Long-Term) No mitigation measures would be required.			
4.2.9 Health Risk Analysis Refer to Section 4.2. 12, Operations, within this table.			
4.2.10 Project Consistency with Applicable Plans Refer to Section 4.2. 12, Operations, within this table.			
4.2.11 Construction 19. The following mitigation measures will reduce emissions to the maximum extent reasonably feasible. a. The project proponent will maintain equipment in tune per manufacturer's specifications. b. The project proponent will use catalytic converters on gasoline-powered equipment. c. The project proponent will retard diesel engine injection timing by 2 degrees. d. High-pressure fuel injectors will be installed. e. Heavy equipment will use reformulated, low-emission diesel fuel. f. The project proponent will substitute electric and gasoline-powered equipment for diesel-powered equipment where feasible. g. Where applicable, equipment will not be left idling for prolonged periods. h. The project proponent will curtail (cease or reduce) construction during periods of high ambient pollutant concentrations (i.e., Stage II smog alerts).	Project Proponent	During project construction.	Monitoring Agency: City B&S Enforcement Agency: City B&S Monitoring Agency: SCAQMD Enforcement Agency: SCAQMD
20. Daily watering of active construction areas, active soil stockpiles, and all traveled unpaved roads shall be performed to minimize dust lofting from construction disturbances. Construction areas will also receive a soil stabilization (sealant) product if they are to be left unattended for periods in excess of 5 days and	Project Proponent	During project construction.	Monitoring Agency: SCAQMD and City LEA Enforcement Agency: SCAQMD

Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
control is required.			
21. Wind speed shall be continually monitored using onsite anemometers. Excavation within construction areas shall be halted when the 15-minute average wind speed exceeds 15 mph or when the instantaneous wind speed exceeds 25 mph.	Project Proponent	During project construction.	Monitoring Agency: SCAQMD Enforcement Agency: SCAQMD
22. Graded areas shall be watered as necessary to reduce dust emissions.	Project Proponent	During project construction.	Monitoring Agency: SCAQMD and City LEA Enforcement Agency: SCAQMD
23. Disturbed areas shall be revegetated with an interim ground cover as specified in the proposed revegetation program. Excavation will proceed in a manner to reduce the amount of graded areas at any given time.	Project Proponent	During project construction.	Monitoring Agency: SCAQMD Enforcement Agency: SCAQMD
4.2.12 Operations			
24. <u>Construction Equipment</u> a. The project proponent will maintain equipment in tune per manufacturer's specifications. b. The project proponent will use catalytic converters on gasoline-powered equipment. c. The project proponent will retard diesel engine injection timing by 2 degrees. d. High-pressure fuel injectors will be installed. e. Heavy equipment will use reformulated, low-emission diesel fuel. f. The project proponent will substitute electric and gasoline-powered equipment for diesel-powered equipment where feasible. g. Where applicable, equipment will not be left idling for prolonged periods.	Project Proponent	Throughout landfill operations.	Monitoring Agency: City B&S Enforcement Agency: City B&S
h. The project proponent will curtail (cease or reduce) construction during periods of high ambient pollutant concentrations (i.e., Stage II smog alerts).	Project Proponent	Throughout landfill operations.	Monitoring Agency: SCAQMD Enforcement Agency: SCAQMD
25. <u>Refuse Trucks</u> The following measures will be applied to the project proponent's operated trucks that utilize the project site.			
a. Refuse trucks shall be maintained in proper tune. Trucks observed to emit excessive amounts of smoke (particulate matter) shall either be tuned up or repaired, as applicable.	Project Proponent	Throughout landfill operations.	Monitoring Agency: City B&S Enforcement Agency: City B&S
b. Where applicable, high-pressure fuel injector nozzles shall be used, and diesel engine timing shall be retarded by 2 degrees.	Project Proponent	Throughout landfill operations.	Monitoring Agency: City B&S Enforcement Agency: City B&S
c. Using a progressive fee schedule, the project proponent shall encourage trucks to carry full loads.	Project Proponent	Throughout landfill operations.	Monitoring Agency: City B&S Enforcement Agency: City B&S
d. The project proponent shall encourage trucking to be performed during off-peak hours. This shall be accomplished through coordination of deliveries with the transfer stations that supply refuse, restrictions in the hours of operation, and/or a fee schedule that penalizes haul trucks arriving during peak congestion periods. This will reduce emissions by increasing truck speeds and eliminating prolonged idling in traffic.	Project Proponent	Throughout landfill operations.	Monitoring Agency: City B&S Enforcement Agency: City B&S

Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
e. When operating onsite, trucks shall not be left idling for periods in excess of 5 minutes.	Project Proponent	Throughout landfill operations.	Monitoring Agency: City B&S Enforcement Agency: City B&S
f. Private owner-operators shall be warned that, if their trucks emit excessive amounts of smoke as determined by scale house workers, they will not be allowed future access to the landfill facility.	Project Proponent	Throughout landfill operations.	Monitoring Agency: City B&S Enforcement Agency: City B&S
26. <u>Truck Travel and Fugitive Dust Emissions</u>			
a. To minimize fugitive dust emissions, the access roadways shall be paved, as necessary, and haul roads to the working face areas shall be hard packed and or covered with a crushed stone layer. Paved and/or crushed stone roadways shall extend up to new active fill areas as development of the landfill progresses.	Project Proponent	Throughout landfill operations.	Monitoring Agency: SCAQMD Enforcement Agency: SCAQMD
b. Curbs and gutters shall be used. At least twice daily watering or wet sweeping of paved roads to remove windblown surface dust shall occur. AP-42 assigns a control efficiency of 50 percent for twice weekly cleaning of industrial paved roads. With twice daily cleaning, a control efficiency in excess of 90 percent is predicted.	Project Proponent	Throughout landfill operations.	Monitoring Agency: SCAQMD Enforcement Agency: SCAQMD
c. For unpaved clay roads, mitigation shall include an SCAQMD-approved chemical dust suppressant with a manufacturer's demonstrated control efficiency in excess of 90 percent shall be regularly applied to inactive areas, during windy periods. Note that this control efficient is less than (i.e., more conservative than) the 95-percent value used at the El Sobrante Landfill. (Draft South Coast Air Quality Management District Consultation No. 4, Work in Progress Air Quality Analysis Refinements, El Sobrante Landfill Expansion, TRC Environmental Solutions, Inc., May 2, 1997).	Project Proponent	Throughout landfill operations.	Monitoring Agency: SCAQMD Enforcement Agency: SCAQMD
d. For unpaved crushed stone covered roads, mitigation shall include the use of a crushed stone topcoat in addition to the regular application of a SCAQMD-approved chemical dust suppressant and subsequent watering, a control efficiency in excess of 95 percent is predicted.	Project Proponent	Throughout landfill operations.	Monitoring Agency: Project Site Manager and SCAQMD, Enforcement Agency: SCAQMD and
27. <u>Heavy Equipment Operations</u>			
a. Operations shall be restricted to encompass no more than a 10-acre active working face area.	Project Proponent	Throughout landfill operations.	Monitoring Agency: SCAQMD Enforcement Agency: SCAQMD
b. The disturbed area (subject to the surface erosion) shall be reduced from 40 acres to 20 acres when operations occur south of the smaller former filling area of the existing inactive City Landfill.	Project Proponent	Throughout landfill operations.	Monitoring Agency: SCAQMD Enforcement Agency: SCAQMD
28. <u>Site Erosion</u>			
a. To the extent technically feasible, material excavated from one portion of the project site shall be used as daily cover material in an adjacent area to minimize travel distances for such cover material.	Project Proponent	Throughout landfill operations.	Monitoring Agency: SCAQMD Enforcement Agency: SCAQMD
b. Subject to approval by the California Integrated Waste Management Board (CIWMB), filling in each active area shall be prolonged through the utilization of a 20-foot maximum cell height. This would reduce the area of excavation and minimize the disturbances to the landfill, thereby	Project Proponent	Throughout landfill operations.	Monitoring Agency: CIWMB and City LEA Enforcement Agency: CIWMB and City LEA

Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
providing an effective control of fugitive dust.			
c. A temporary vegetation cover shall be established on all slopes that are to remain inactive for a period longer than 180 days.	Project Proponent	Throughout landfill operations.	Monitoring Agency: SCAQMD Enforcement Agency: SCAQMD
d. An SCAQMD approved soil stabilization (sealant) product shall be used to retard soil erosion and enhance revegetation. Soil sealant shall be applied when necessary to selected working areas of the landfill. The sealant will also be used as a binder or tackifier to hold seed during revegetation, mulch, and fertilizers in-place until grasses become established and stabilize on the landfill surface.	Project Proponent	Throughout landfill operations.	Monitoring Agency: SCAQMD Enforcement Agency: SCAQMD
4.2.13 Odor Impacts			
29. The natural biological processes that generate odors in a landfill through anaerobic decomposition cannot be prevented or avoided. However, the LFGs shall be prevented from escaping to the atmosphere through the use of control measures. These measures include using daily and intermediate cover material over deposited wastes, filling any surface cracks with clean dirt as necessary, and extracting LFG through the use of an LFG collection and recovery system and destroying collected gases by combustion.	Project Proponent	Throughout landfill operations.	Monitoring Agency: SCAQMD and City LEA Enforcement Agency: SCAQMD and City LEA
30. Operational techniques shall be utilized to control odor sources at the landfill. The size of the working face shall be limited so that the area of waste exposed to the atmosphere is kept to a minimum.	Project Proponent	Throughout landfill operations.	Monitoring Agency: SCAQMD and City LEA Enforcement Agency: SCAQMD and City LEA
31. Solid waste shall be compacted within 1 hour of its arrival at the working face.	Project Proponent	Throughout landfill operations.	Monitoring Agency: City LEA Enforcement Agency: City LEA
32. The LFG collection and recovery system shall be installed in phases as each portion of the landfill site is filled. The final system shall contain a network of gas extraction wells, collection system piping, and flaring facilities. Because the LFG generation begins at lower levels of volume and increases during the landfill site life, the gas will be flared initially until sufficient quantities are available for processing into electricity.	Project Proponent	Throughout landfill operations.	Monitoring Agency: SCAQMD and City LEA Enforcement Agency: SCAQMD and City LEA
33. If an odor problem should develop, appropriate control measures shall be implemented. These measures 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 LFG collection and recovery system.	Project Proponent	Throughout landfill operations.	Monitoring Agency: SCAQMD, and City LEA Enforcement Agency: SCAQMD and City LEA
34. To ensure that odors are kept to a minimum, the following odor/LFG monitoring program shall be implemented for the proposed landfill project. The monitoring program shall comply with the requirements of SCAQMD Rule 1150.1 and include: a. <u>Sample Probe Installation</u> : One monitoring probe per 1,000 feet or as identified by South Coast Air Quality Management District (SCAQMD) and/or Local Enforcement Agency (LEA) in the landfill expansion, and one probe per 650 feet or as identified by SCAQMD and/or LEA in the City Inactive landfill along the landfill perimeter, or which ever is more restrictive shall be installed to identify potential areas of subsurface landfill gas (LFG) migration. These probes shall be monitored to ensure	Project Proponent	Throughout landfill operations.	Monitoring Agency: SCAQMD, and City LEA Enforcement Agency: SCAQMD and City LEA

Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
<p>that quantities of LFG beyond regulatory standards do not vent offsite through subsurface soils.</p> <p>b. <u>Integrated Landfill Surface Sampling</u>: The landfill surface shall be monitored to ensure that the average concentration of total organic compounds over the landfill surface does not exceed SCAQMD's standard of 50 ppm.</p> <p>c. <u>Ambient Air Samples</u>: 24-hour integrated gas samples and required meteorological data shall be taken to assess any impact the landfill is having on the ambient air quality at the landfill perimeter.</p> <p>d. <u>Instantaneous Landfill Surface Monitoring</u>: Spot checks on the landfill surface shall be made to determine the maximum concentration of total organic compounds measured as methane, measured at any one point on the surface of the landfill does not exceed the SCAQMD's standard of 500 ppm.</p> <p>e. <u>Regular Monitoring and Annual Testing</u>: LFG concentrations at perimeter probes, gas collection system headers, the landfill surface, and in ambient air downwind of the landfill shall be monitored once per month or less frequently (but no less than quarterly) as required by the SCAQMD. The LFG collection system shall be adjusted and improved based on quarterly monitoring data and annual stack testing results.</p>			
<p>35. Landfill gas flares shall be below the adjacent ridges (unless otherwise required by the South Coast Air Quality District). Flaring systems shall be sited as required by the SCAQMD and constructed using BACT. The flames shall be totally contained within the stack. Flame arresters shall be provided to the satisfaction of the City Building and Safety Department. To the extent technically and economically feasible, gas recovered at the landfill site shall be converted to energy or developed for other beneficial uses rather than flared.</p>	Project Proponent	Throughout landfill operations.	Monitoring Agency: SCAQMD, and City B&S Enforcement Agency: SCAQMD and City B&S
<p>4.3 SURFACE AND GROUNDWATER</p> <p>4.3.1 Surface Water</p> <p>36. To ensure that infiltration of surface water into the closed landfill cells is minimized, surface runoff shall be intercepted and diverted around the landfill. The method of diversion used at the project site shall include the use of lined interceptor ditches placed along the edges of the landfill areas. This system of ditches shall flow into monitored sedimentation basins. After sediment content has been reduced, surface waters shall flow into the existing flood control channel directly east of the project site entrance.</p>	Project Proponent	Prior to commencement of landfill development.	Monitoring Agency: LARWQCB, CIWMB, City LEA, and City BOE Enforcement Agency: LARWQCB, CIWMB, City LEA, City B&S, and City BOE
<p>37. As development of the site proceeds, surface drainage systems shall be maintained so that surface runoff is diverted away from working slopes and isolated from landfilled refuse. Onsite drainage channels would be designed per CCR, Title 23, Division 3, Chapter 15, Article 3, § 2533(C), and County of Los Angeles Public Works Department, Flood Control Division requirements.</p>	Project Proponent	Prior to commencement of landfill development.	Monitoring Agency: LARWQCB, CIWMB, City LEA, and City BOE Enforcement Agency: LARWQCB, CIWMB, City LEA, and City BOE
<p>38. Permanent bench drainage ditches shall be installed when final cover is placed on completed portions of the landfill. These ditches shall be lined. Temporary unlined drainage facilities consisting of diversion ditches (V-ditches) where necessary shall directly intercept natural surface runoff. Any intermittent channel flow in the existing canyon bottom shall be captured, channelized, and conveyed into Sedimentation Basin A. Diversion ditches shall convey surface</p>	Project Proponent	Throughout landfill operations.	Monitoring Agency: LARWQCB, CIWMB, City LEA, and City BOE Enforcement Agency: LARWQCB, CIWMB, City LEA, and City BOE



December 20, 2017

Mr. Chris Coyle, General Manager
Sunshine Canyon Landfill / Republic Services
14747 San Fernando Road
Sylmar, CA 91342

Subject: Sunshine Canyon Landfill (SWIS No. 19-AA-2000)
LEA Approval of Alternative Daily Cover Evaluation Report – Second Year,
Pilot Project Using Geosynthetic Panel Product”, dated October 11, 2017

Dear Mr. Coyle,

On October 12, 2017, the Alternative Daily Cover (ADC) Pilot Project at Sunshine Canyon Landfill concluded after a period of two years. As required by the conditions of approval, Republic Services submitted to the Sunshine Canyon Landfill Local Enforcement Agency (SCL LEA) a final evaluation report titled “Alternative Daily Cover Evaluation Report – Second Year, Pilot Project Using Geosynthetic Panel Product”, dated October 11, 2017. The SCL LEA has completed reviewing the evaluation report along with the submitted monthly reports on the daily inspections of the ADC and has the following comments:

The SCL LEA has conducted its own independent review and evaluation of the effectiveness of the ADC at Sunshine Canyon Landfill. The SCL LEA took a holistic systems approach in evaluating the ADC that took many factors into consideration such as: odor complaints (all complaints), the timing of the implementation of the various aspects of the SCAQMD Abatement Order (e.g., LFG wells, and pump installation schedule), weather conditions (e.g., extraordinary wet season), surface emissions data, in-person observations of the trash removed during LFG well drilling, leachate seeps, and daily SCL LEA observations. Special attention was given to the performance of the ADC for Cell CC-3B, which was completed in April 2017. Cell CC-3B is a cell that utilized ADC and abuts up against an area in which 9” of compacted soil was utilized for daily cover without peel-back (shown in figure below outlined in red).

SCL Monitoring Grids ADC Evaluation

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U	V	W	X	Y	Z
1																										
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The specific monitoring grids that comprise of the Cell CC-3B are as shown below:

CELL CC-3B ADC GRIDS						
	S16	T16				
R17	S17	T17	U17			
R18	S18	T18	U18	V18	W18	
		T19	U19	V19	W19	X19
		T20	U20	V20	W20	X20
		T21	U21	V21	W21	X21
			U22	V22	W22	X22

The SCL LEA conducted independent analysis of the instantaneous surface emissions data and the integrated surface emissions data; and conducted data mining and statistical analysis. The SCL LEA also installed visqueen test plots on the side slopes and flat areas of the ADC Cell CC-3B to supplement the surface emissions data analysis. The complete detailed technical files (Excel Spreadsheets) the SCL LEA utilized in the analysis of the ADC have been made available for review in a folder titled "SCL LEA Odor Mitigation Technical Data and Analysis File (2017)" at the following link:

[https://www.dropbox.com/home/Sunshine%20Canyon%20Landfill%20Local%20Enforcement%20Agency%20Odor%20Mitigation%20Folder/SCL%20LEA%20Odor%20Mitigation%20Technical%20Data%20and%20Analysis%20File%20\(2017\)](https://www.dropbox.com/home/Sunshine%20Canyon%20Landfill%20Local%20Enforcement%20Agency%20Odor%20Mitigation%20Folder/SCL%20LEA%20Odor%20Mitigation%20Technical%20Data%20and%20Analysis%20File%20(2017))

The specific file for the SCAQMD Rule 1150.1 Analysis is titled "SCL-Rule1150.1Monitoring-110217.xlsx"

[https://www.dropbox.com/home/Sunshine%20Canyon%20Landfill%20Local%20Enforcement%20Agency%20Odor%20Mitigation%20Folder/SCL%20LEA%20Odor%20Mitigation%20Technical%20Data%20and%20Analysis%20File%20\(2017\)?preview=SCL-Rule1150.1Monitoring-110217.xlsx](https://www.dropbox.com/home/Sunshine%20Canyon%20Landfill%20Local%20Enforcement%20Agency%20Odor%20Mitigation%20Folder/SCL%20LEA%20Odor%20Mitigation%20Technical%20Data%20and%20Analysis%20File%20(2017)?preview=SCL-Rule1150.1Monitoring-110217.xlsx)

Examples of key findings made by the SCL LEA are based on detailed technical analysis, the key analysis are described below:

The general trend after the LFG wells and pumps that were installed (August 2017) for the integrated surface readings in the grids that overlay Cell CC-3B are in compliance with the regulatory requirements, whereas in the past, there were exceedances of the surface emissions threshold (>25 ppm). The SCL LEA is continuously monitoring on a monthly basis the surface emissions data reported in the SCAQMD Rule 1150.1 reports.

The figures below show the overall location of the monitoring grids with the integrated surface emissions data for September 2017. The spreadsheet / database will be periodically updated and analyzed by the SCL LEA to determine the continued impact of the ADC within the context of being one of the complementary mitigations measures with the totality of the overall best combination of mitigation measures.

SCL Monitoring Grids ADC Evaluation

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U	V	W	X	Y	Z
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CELL CC-3B ADC GRIDS

S16	T16
R17	S17
T17	U17
R18	S18
T18	U18
V18	W18
T19	U19
V19	W19
X19	
T20	U20
V20	W20
X20	
T21	U21
V21	W21
X21	
U22	V22
W22	X22

September 2017
Integrated Surface Readings
(ppmv Methane)

10.10	32.51	22.47	6.49	7.98	4.84				
3.05	11.11	16.26	5.15	6.65	7.25	6.92			
2.67	6.07	5.03	7.03	4.04	10.27	2.78			
5.37	6.60	23.74	3.90	3.49	3.98	3.36			
5.25	3.45	7.98	2.56	3.59	9.02	3.80	3.54	3.51	
3.60	4.55	10.87	6.78	3.74	3.99	4.55	4.63	4.66	
7.79	3.80	9.07	10.71	8.65	4.54	2.43	3.54	2.59	
3.82	3.95	11.72	10.08		7.61	4.37	3.80	4.45	
4.00	4.06	4.10	4.00	S					

Newer Monitoring Grid-Majority is Not 9 Inch Soil
 Newer Monitoring Grid-Majority is 9 Inch Soil
 Old North Monitoring Grid-Majority is Not 9 Inch Soil
 Old North Monitoring Grid-Majority is 9 Inch Soil
 Old South Monitoring Grid-Majority is Not 9 Inch Soil

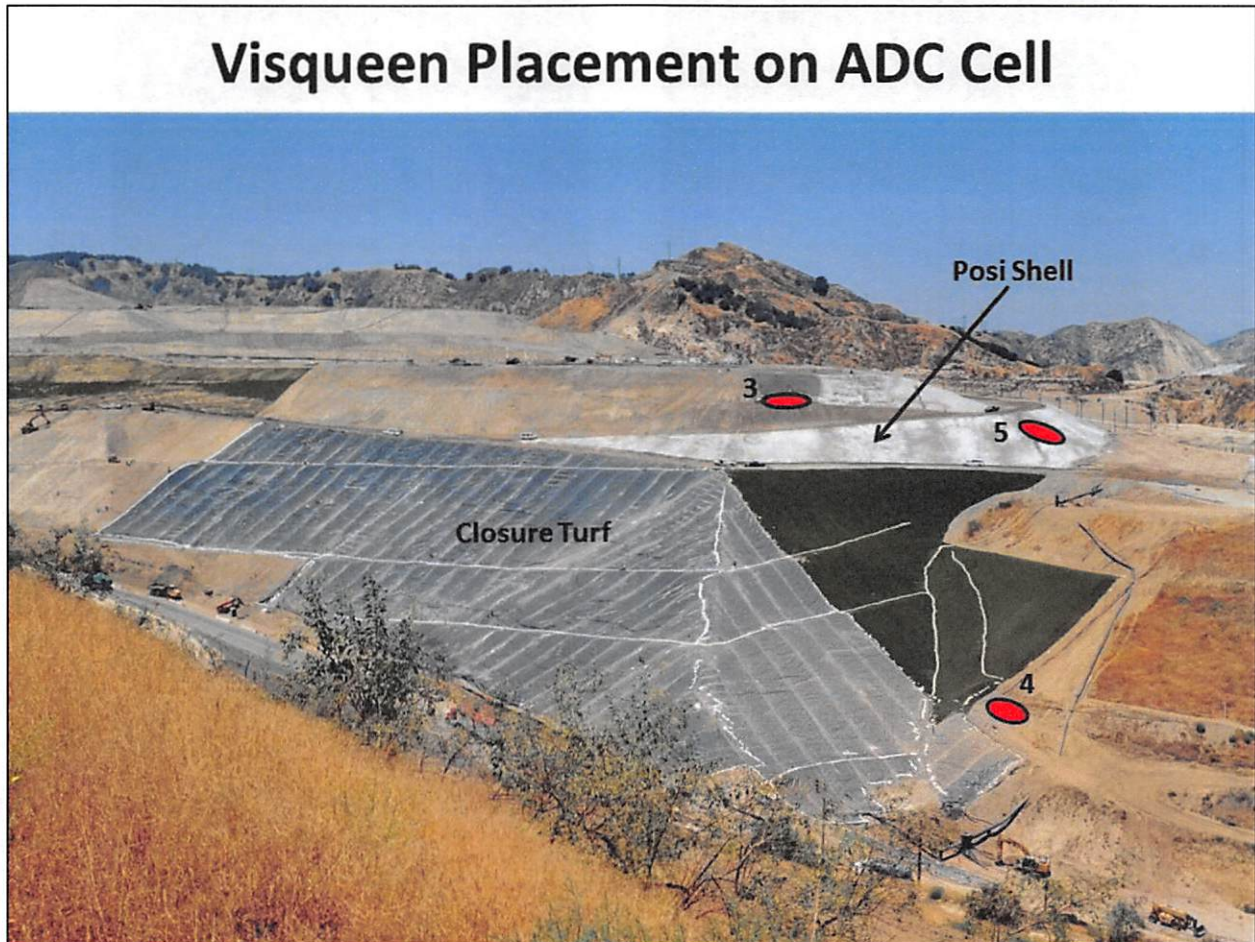
September 2017 Cell CC-3B (ADC Cell) Integrated Surface Readings (ppmv Methane)

10.10	32.51	22.47	6.49	7.98	4.84				
3.05	11.11	16.26	5.15	6.65	7.25	6.92			
2.67	6.07	5.03	7.03	4.04	10.27	2.78			
5.37	6.60	23.74	3.90	3.49	3.98	3.36			
5.25	3.45	7.98	2.56	3.59	9.02	3.80	3.54	3.51	
3.60	4.55	10.87	6.78	3.74	3.99	4.55	4.63	4.66	
7.79	3.80	9.07	10.71	8.65	4.54	2.43	3.54	2.59	
3.82	3.95	11.72	10.08		7.61	4.37	3.80	4.45	
4.00	4.06	4.10	4.00	S					

Individual Grid
Emissions by Month
for Grids within Cell
CC-3B

Newer Monitoring Grid-Majority is Not 9 Inch Soil
 Newer Monitoring Grid-Majority is 9 Inch Soil
 Old North Monitoring Grid-Majority is Not 9 Inch Soil
 Old North Monitoring Grid-Majority is 9 Inch Soil
 Old South Monitoring Grid-Majority is Not 9 Inch Soil

In order to provide a more real-time physical observable evaluation of the impact of the ADC, the SCL LEA utilized a visqueen field test (as previously done to demonstrate surface emissions) at multiple locations on the ADC Cell CC-3B. The visqueen was installed and the tests ran for a period of two weeks in October 2017.



The SCL LEA evaluation of the ADC utilized in Cell CC-3B also had to take into consideration the implementation of the intermediate cover enhancement (ICE) upgrades mandated by the SCAQMD Abatement Order. Three locations for installing the visqueen were selected on the ADC cell (Location ID# 3, #4, and #5); locations representing the locations most likely to have surface emissions (e.g., steepest slope (#5), transition border area (#4), and in an area that had no enhancement to the intermediate cover (#3).

No "puffing" in the visqueen was observed over a period of two weeks. Also, no leachate seeps were observed by the SCL LEA.

October 14, 2017 (Last Day after Two Weeks)

#0		#1	
#2		#3	
#4		#5	

The odor complaint data, which is tracked by SCAQMD, is one of the primary measures utilized by the SCL LEA in determining the overall impact of the ADC and other mitigation measures implemented by the Sunshine Canyon Landfill. The SCL LEA looks at each and every single complaint (not just the verified ones) in its data mining / analysis. SCAQMD data is provided to the SCL LEA staff and the data is loaded onto a database/spreadsheet that looks at the type of complaint (e.g., trash, landfill gas, combination, other, etc.), the time of day, day of week, etc. Data mining and correlative analysis are conducted as part of the SCL LEA evaluation process.

Odor complaints for the key months in 2017 after the completion of the ADC Cell CC-3B and after the majority of the mitigation measures were implemented, were compared to pre-ADC operations/pre-mitigation measure implementation. The comparison shows a significant decrease of odor complaints. The decrease cannot be totally attributed to the implementation of the ADC or the ICE. It is the result of all of the mitigation measures of which the ADC is one. The ADC is designed to complement other programs in which the primary purpose is to improve the overall collection efficiency of the landfill gas collection system. The ADC improves trash-to-trash contact, and enhances movement of LFG

toward the collection wells, and also allows drainage of leachate to the leachate collection system at the bottom liner.

The detailed complaint analysis can be found in several files within the folder named [“SCL LEA Odor Mitigation Technical Data and Analysis File \(2017\)”](#) (link provided above).

Below is the SCAQMD data on odor complaints:

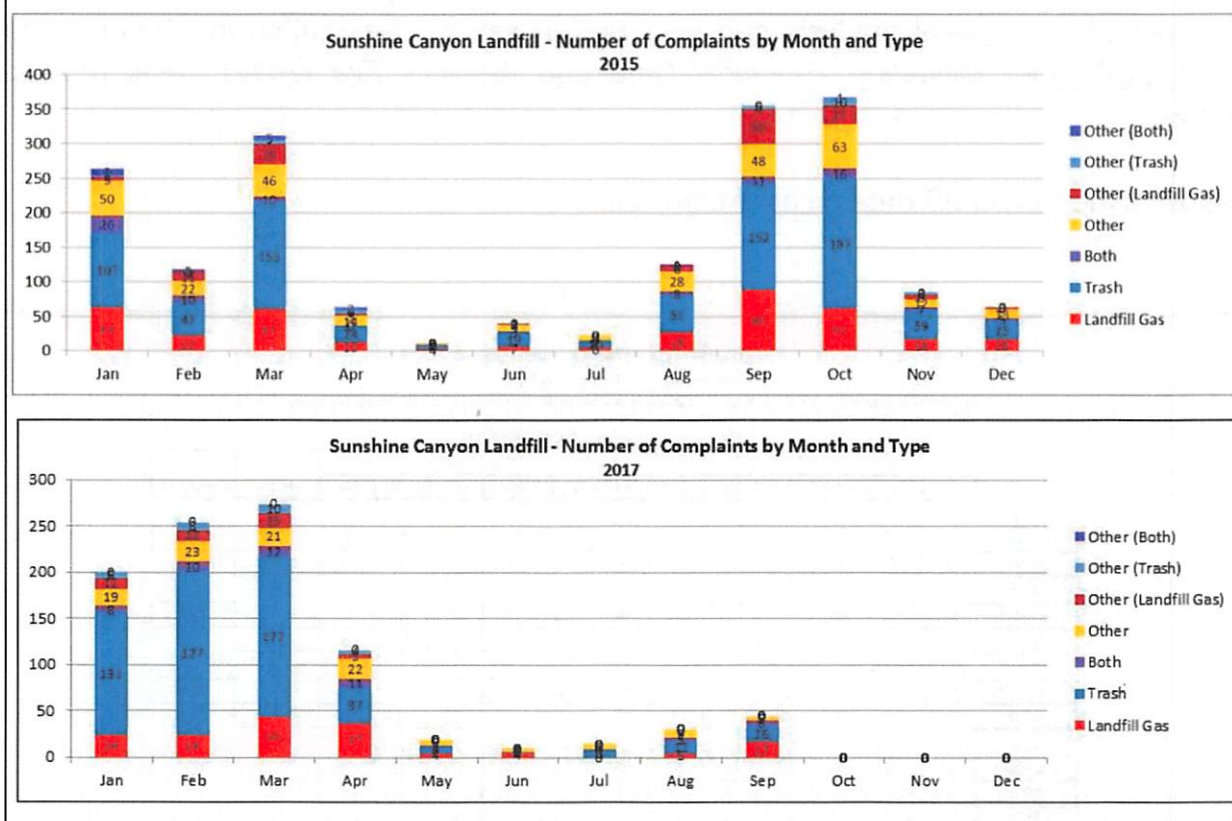
SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT															
Sunshine Canyon Landfill, Facility ID No. 49111															
Odor Complaints Reported to AQMD Alleging SCL and Notices of Violation (NOV) Summary from 2009 through November 30, 2017															
Public Nuisance: AQMD Rule 402; Calif. H&S 41700															
	Jan	Feb	March	April	May	June	July	August	Sept	Oct	Nov	Dec	Total NOVs	Total Complaints	
2010															
Complaints	64	94	93	56	21	5	13	33	40	39	76	79		613	
NOVs	1	2	0	1	0	0	0	0	0	0	0	2	6		
2011															
Complaints	138	173	222	99	92	45	36	138	181	191	126	124		1565	
NOVs	2	4	7	2	1	0	0	2	2	3	3	4	30		
2012															
Complaints	183	104	66	129	97	55	113	140	216	171	92	139		1485	
NOVs	5	1	1	2	2	1	2	2	4	3	2	4	29		
2013															
Complaints	82	108	112	112	46	62	65	97	138	176	93	72		1181	
NOVs	0	1	2	2	0	1	0	0	2	3	3	1	15		
2014															
Complaints	32	37	164	122	52	28	83	81	302	223	80	278		1482	
NOVs	0	0	4	5	1	0	2	4	6	5	3	7	37		
2015															
Complaints	260	119	297	60	12	41	23	126	337	370	85	65		1795	
NOVs	5	3	7	2	0	0	0	2	11	7	2	0	39		
2016															
Complaints	100	188	185	181	30	74	52	85	206	193	206	59		1558	
NOVs	2	4	6	5	0	1	1	1	2	4	4	1	31		
2017															
Complaints	200	254	274	116	19	10	14	30	44	27	22			1010	
NOVs	6	7	6	1	0	0	0	0	0	0	0		20		
													Total R402 NOV's Issued to Date		
													Total Complaints *	10,983	
													Total R402 NOV's Issued **	214	

* Includes 313 Complaints from 2009
 ** Includes 7 NOV's from 2009
 December 5, 2017

Page 1 of 2

The SCL LEA conducts extensive analysis on the data mining files to independently evaluate the number of odor complaints and the details associated with each complaint. Below is a figure comparing the number and type of odor complaints during the pre-ADC (2015) and post-ADC implementation (2017) time periods. The SCL LEA will be continuing to update the odor complaint data from SCAQMD and also update the data mining and statistical analysis.

Comparative Complaint Data 2015 vs 2017



Note: October 2017 had 27 complaints, and November 2017 had 22 complaints

As part of the SCL LEA's normal daily duties at Sunshine Canyon Landfill, the onsite LEA inspector would inspect the ADC in the morning prior to the start of operations for compliance with the performance standards for controlling blowing litter, vectors, fires, odor and scavenging. The onsite LEA inspector would conduct a neighborhood survey prior to entering the landfill to determine if they could detect any adverse effects from the use of the ADC at the site. The daily inspection results did not detect any major problems with the ADC. Initially when the pilot project began, there were a couple of occasions when a geosynthetic panel was dislodged due to heavy winds. The landfill operator made adjustments to the Enviro Cover System so that additional ballast was applied each night to the geosynthetic panels. In addition, to ensure that the trash is properly covered each night, the ADC is not used during extreme wind events. A full dirt cover was utilized during these events.

Based on the above analysis and the review of Republic Services final evaluation report, the SCL LEA has made the following determinations:

- (1) The SCL LEA has determined that the geosynthetic plastic panel ADC product meets the performance requirements of Title 27, California Code of Regulations,

Section 20690 for controlling blowing litter, vectors, fires, odor and scavenging and is as effective as the nine inches of compacted soil; and

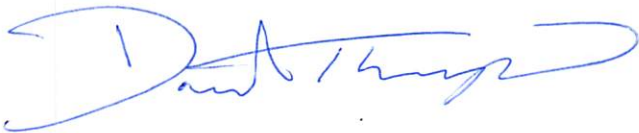
- (2) The SCL LEA has determined that the use of the geosynthetic plastic ADC enhances/improves the overall efficiency of the landfill gas collection system in the measurable control of landfill gas emissions; and
- (3) The SCL LEA has determined that there is sufficient technical documentation and based upon field observations of the spoils from the drilling of the gas collection wells and the improved landfill gas collection rates to concur with SCAQMD's recommendation to the continued practice of partially peeling back the nine inches of compacted daily soil cover when the landfill is not able to use the ADC. This will improve the overall performance of the leachate collection system, the landfill gas collection system and reduce landfill gas and trash related odors.

Therefore, the SCL LEA concurs with Republic Services conclusion that the geosynthetic panel product (Environmental Products, Inc. (EPI), Enviro™Cover, 1.75 mil thickness) can continue to be used as an ADC at Sunshine Canyon Landfill as part of its daily operations. However, in order to make it a permanent practice, Republic Services is required to amend the Joint Technical Document to reflect this activity.

All associated technical data analysis files used in our analysis have been loaded onto the SCL LEA / Sunshine Canyon Landfill Sharefile FTP site and are also accessible via our SCL LEA website: www.scllea.org

If you have any questions, please contact me at 213-252-3932 or Ms. Dee Lugo at 626-430-5540.

Sincerely,

A handwritten signature in blue ink, appearing to read 'David Thompson', with a stylized flourish at the end.

David Thompson, REHS
SCL LEA Program Manager

Cc: Maurice Pantoja, SCLLEA
Dee Lugo, SCLLEA
Jose Gutierrez, SCLLEA
Wayde Hunter, SCL CAC

Nicholas Sanchez, SCAQMD
Martins Aiyetiwa, DPW
Rob Sherman, Republic Services

ATTACHMENT K



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 requirement's 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.

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

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,



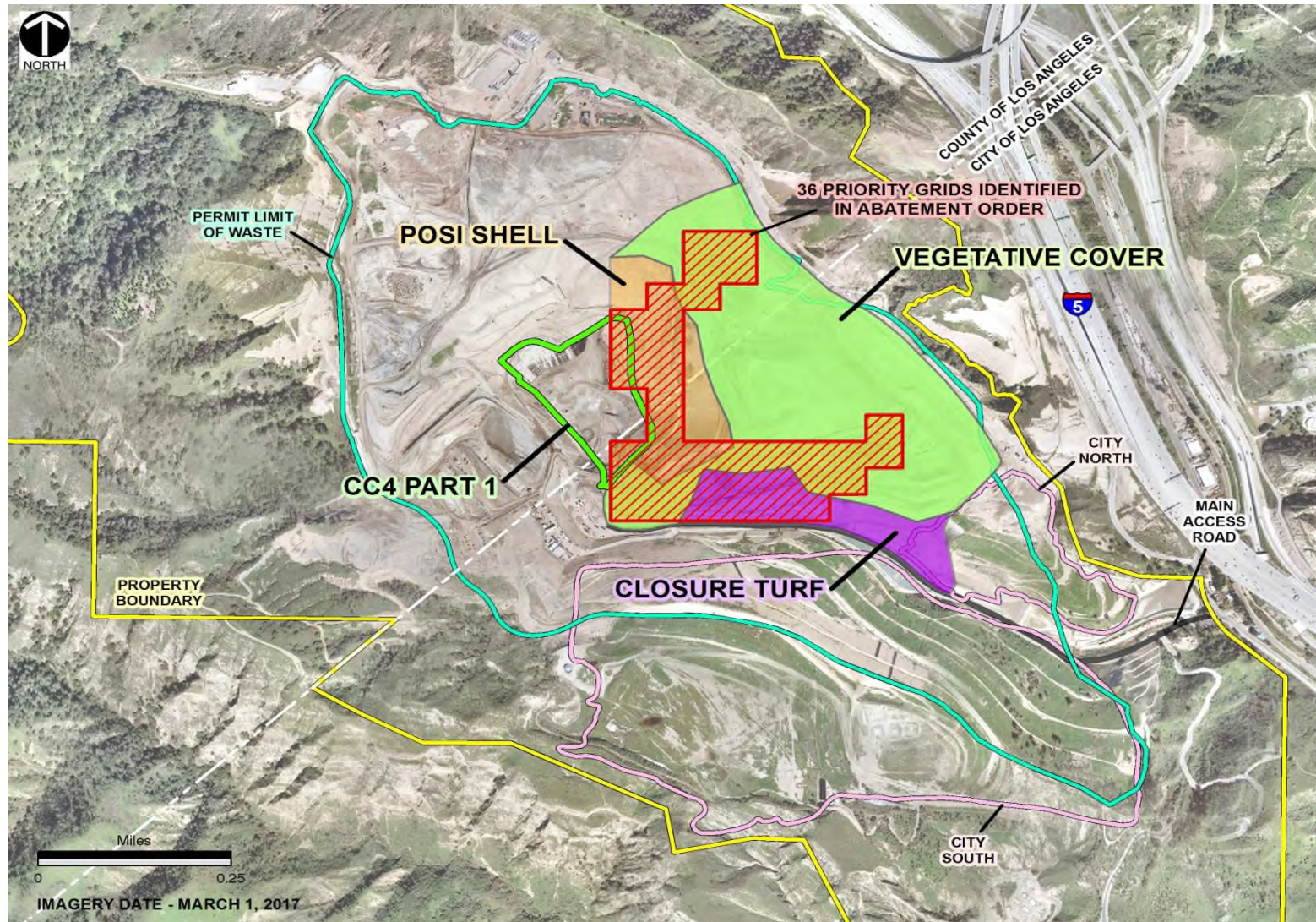
Rob Sherman
General Manager
Sunshine Canyon Landfill

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)												

As of March 28, 2017

Locations for Enhanced Intermediate Covers



ATTACHMENT L



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,

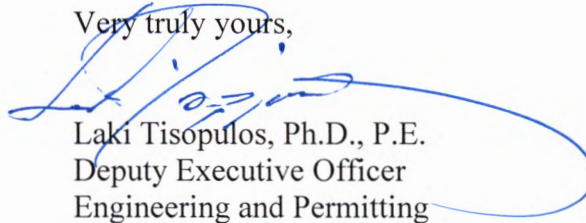
The South Coast Air Quality Management District (SCAQMD) has received the Revised BMP Plan for the Control and Treatment of Fresh Trash Odor (the "Revised BMP Plan"), as required pursuant to Condition 14 of the Stipulated Order for Abatement ("Order") in Hearing Board Case No. 3448-14. The SCAQMD has 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 Tisopulos, Ph.D., P.E.
Deputy Executive Officer
Engineering and Permitting

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

ATTACHMENT M



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,

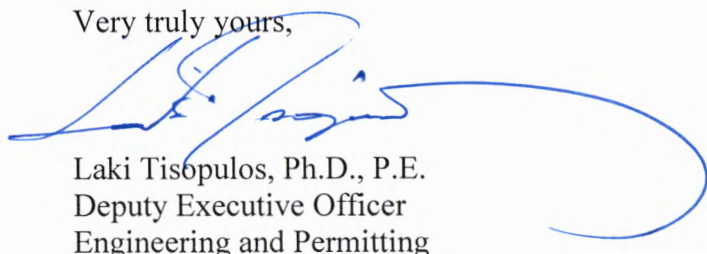
The South Coast Air Quality Management District (SCAQMD) has received the Revised Odorous Load Management Plan (the "Plan"), as required pursuant to Condition 15 of the Stipulated Order for Abatement ("Order") in Hearing Board Case No. 3448-14. The SCAQMD has performed a preliminary review in consultation 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 Tisopulos, Ph.D., P.E.
Deputy Executive Officer
Engineering and Permitting

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

SUNSHINE CANYON LANDFILL

October 31, 2017

VIA EMAIL

Mr. Nicholas Sanchez, Esq.
Senior Deputy District Counsel
South Coast Air Quality Management District
21865 Copley Dr.
Diamond Bar, CA 91765

Re: In the Matter of SCAQMD v Browning-Ferris Industries of California
Case No. 3448-14 Confirmation of Implementation:
Condition 14.f. Revised Best Management Plan
Condition 15.g. Revised Odorous Load Management Plan

Mr. Sanchez,

This letter will serve as confirmation that the Revised Best Management Plan and Revised Odorous Load Management Plan have been implemented as outlined below.

Condition 14.f. *Respondent shall, within ten (10) business days of receiving approval from the District, implement the Revised Best Management Practices Plan.*

Status: **Complete**
Implementation of the Revised Best Management Practices Plan for the landfill began within 10 days of the approval notification received from the SCAQMD on 5/3/17. Key elements of the plan are identified below:

- A. **Use of Misting/Vapor System** – The site's modified dust bosses, buffalo monsoon units, misting fences and vapor system continue to be utilized daily to mitigate working face odors.
- B. **Use of EnviroCover™** – Application of the EnviroCover™ product continues as the final evaluation report is under review by the SCL-LEA and County DPW.
- C. **Odorous Load Management** – Loads that are identified as odorous are given priority for disposal.
- D. **Waste Processing Procedures** – Loads from tippers and walking floor trailers are pushed promptly to the working face.

- E. **Annual Training** – Training has been updated and conducted to include training specific to the new odor mitigation measures on site, the identification of odorous loads and procedures for handling.
- F. **Direct Application of Deodorizer** – Per approval from the Water Board and SCL LEA, certain pieces of site equipment have been outfitted with a sprayer system to deploy a deodorizer solution mixed with water directly to the waste material at the working face.
- G. **Organic Waste Diversion** – Implementation of the transfer station Organic Transload Program as well as the Food Recovery program with Food Finders is in progress. The Chino CASP system is nearing construction completion and the American Transfer station organics pre-processing system is under final design review.
- H. **Use of Alternative Working Faces** – Disposal for disposal Cell CC-4A, Part 1 commenced in March of 2017. Disposal in Cell CC-4A, Part 2 commenced in late October, 2017.

Condition 15.g.

Respondent shall, within ten (10) business days of receiving approval from the District, implement the Revised Odorous Load Management Plan.

Status:

Complete

Implementation of the Revised Odorous Load Management Plan for the transfer stations began within 10 days of the approval notification received from the SCAQMD on 5/3/17. Key elements of the plan are identified below:

- I. **Annual Training** – Training has been updated and conducted to include training specific to the identification of odorous loads, procedures for handling odorous loads and notifications.
- J. **Random Load Checks** - Random load checks specific to odorous loads have been incorporated in each site's load check procedures including the identification of routine generators with potential for odorous loads.
- K. **Minimize Overnight Storage of Waste in Transfer Trailers** - The amount of waste stored in transfer trailers overnight is kept to a minimum.

- L. On-Site Treatment of Odorous Loads** - Installation of sprayer systems for the application of neutralizer solution directly onto the waste as it is loaded into trailers prior to tarping has been completed for each transfer station.

Please reach out to me with any questions.

Sincerely,

A handwritten signature in black ink that reads "Rob Sherman". The signature is fluid and cursive, with the first name "Rob" and last name "Sherman" clearly distinguishable.

Rob Sherman
General Manager

ATTACHMENT N



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.

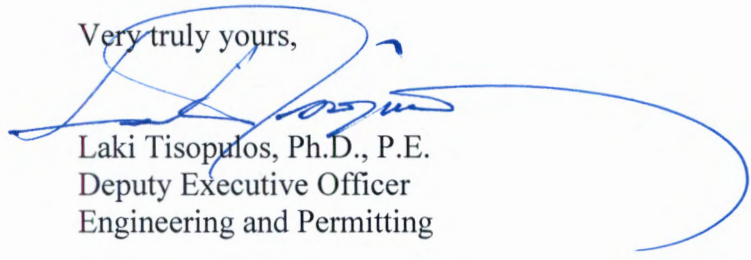
Consistent with the Order, to the extent applicable, you are now required to implement all provisions of the Sunshine Canyon Landfill Assessment of Physical Barriers and Dust-Odor Containment Structures.

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 Tisopulos', is written over the typed name and title. The signature is fluid and cursive, with a long horizontal stroke extending to the right.

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

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

ATTACHMENT O

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 Hajialiakbar 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

Payment Receipt

Receipt #: TRC-010356-11-05-2017

Paid On: 05/11/2017

Paid By:

REPUBLIC SERVICES, INC.
18500 N ALLIED Way
PHOENIX, AZ 85054



Department of Regional Planning
Richard J. Bruckner, *Director*

320 W Temple Street
Los Angeles, CA 90012

(213) 974-6411

<http://planning.lacounty.gov>

Received By:
Armeneh Arakilians

Printed On:
5/11/2017

Project Number - Case Number Fee Name	Payment Method	Reference No.	Paid Amount
RPZPE2016002500 Violation Penalty - \$1,000	Check	7250017	\$144,000.00
		Total	\$144,000.00

Transaction Note: VIOLATIONS PENALTY

Payment Receipt

Receipt #: TRC-010358-11-05-2017

Paid On: 05/11/2017

Paid By:

REPUBLIC SERVICES, INC.
18500 N ALLIED Way
PHOENIX, AZ 85054



Department of Regional Planning
Richard J. Bruckner, *Director*

320 W Temple Street
Los Angeles, CA 90012

(213) 974-6411

<http://planning.lacounty.gov>

Received By:
Armeneh Arakilians

Printed On:
5/11/2017

Project Number - Case Number Fee Name	Payment Method	Reference No.	Paid Amount
- Contacts Account ACCT# 000265-2016 - Sunshine Cyn LF Penalty - CUP 00-194 (5) CONDITION 11 PENALTY	Check	7250016	\$30,000.00
		Total	\$30,000.00

Transaction Note: SUPPLEMENTAL DEPOSIT FOR CUP 00-194 CONDITION 11

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>

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

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

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

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

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.

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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



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

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

REPUBLIC SERVICES, INC.

No. 7250016

Check Date: 5/10/17

COUNTY OF LOS ANGELES, RGNL PLANNING & ACCTG SVCS, 320 WEST TEMPLE ST ROOM 1383, LOS ANGELES CA 90012

Vendor Number: 214207

INVOICE	DATE	DESCRIPTION	GROSS AMOUNT	DISCOUNT	NET AMOUNT
COND #11-05-08-17 URGENT RTD Exception 5123	05/08/2017	3708774 PO6565556	\$30,000.00	\$0.00	\$30,000.00
TOTALS:			\$30,000.00	\$0.00	\$30,000.00

Detach at Perforation Before Depositing Check

Page 1 of 1

THIS IS A WATERMARKED PAPER - DO NOT ACCEPT WITHOUT NOTING WATERMARK - HOLD TO LIGHT TO VERIFY WATERMARK

REPUBLIC SERVICES, INC.

C/O AWIN MGMT INC
C/O ALLIED WASTE SERVICES
18500 N. ALLIED WAY
PHOENIX, AZ 85054

BANK OF AMERICA

52-153-112

Check Date

05/10/2017

Number

7250016

PAY *Thirty Thousand and 00/100 Dollars*

Amount

\$ ****30,000.00

Void After 180 Days

PAY
TO THE
ORDER OF

COUNTY OF LOS ANGELES
RGNL PLANNING & ACCTG SVCS
320 WEST TEMPLE ST ROOM 1383
LOS ANGELES CA 90012

Marsha A. Lacy
VP, Treasurer

See ATTACHED LETTER DATED 5/11/17

0007250016 1011201539 80231000

REPUBLIC SERVICES, INC.

No. 7250017

Check Date: 5/10/17

COUNTY OF LOS ANGELES, RGNL PLANNING & ACCTG SVCS, 320 WEST TEMPLE ST ROOM 1383, LOS ANGELES CA 90012

Vendor Number: 214207

INVOICE	DATE	DESCRIPTION	GROSS AMOUNT	DISCOUNT	NET AMOUNT
RPZPE2016002500 URGENT RTD Exception 5123	05/04/2017	3708775 PO6565556	\$144,000.00	\$0.00	\$144,000.00
TOTALS:			\$144,000.00	\$0.00	\$144,000.00

Detach at Perforation Before Depositing Check

Page 1 of 1

THIS IS A WATERMARKED PAPER - DO NOT ACCEPT WITHOUT NOTING WATERMARK - HOLD TO LIGHT TO VERIFY WATERMARK

REPUBLIC SERVICES, INC.

C/O AWIN MGMT INC
C/O ALLIED WASTE SERVICES
18500 N. ALLIED WAY
PHOENIX, AZ 85054

BANK OF AMERICA

52-153-112

Check Date

05/10/2017

Number

7250017

PAY *One Hundred Forty Four Thousand and 00/100 Dollars*

Amount

\$ ***144,000.00

Void After 180 Days

PAY
TO THE
ORDER OF

COUNTY OF LOS ANGELES
RGNL PLANNING & ACCTG SVCS
320 WEST TEMPLE ST ROOM 1383
LOS ANGELES CA 90012

Marsha A. Lucy
VP, Treasurer

See Attached LETTER DATED 5/11/17

00007250017 10112015391 80231000

ATTACHMENT P



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 fluid and stylized, with a long horizontal stroke extending to the right.

Maurice L. Pantoja
Environmental Health Services Manager
Environmental Protection Branch



BOARD OF SUPERVISORS

Hilda L. Solis
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Second District

Sheila Kuehl
Third District

Janice Hahn
Fourth District

Kathryn Barger
Fifth District

ATTACHMENT Q



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, CA 92123
(858) 467-4201
www.wildlife.ca.gov

EDMUND G. BROWN, Jr., Governor
CHARLTON H. BONHAM, Director



November 27, 2017

Chris Coyle
Republic Services, Inc.
14747 San Fernando Road
Sylmar, CA 91342
Ccoyle@republicservices.com

Dear Mr. Coyle:

Complete Notification of Lake or Streambed Alteration
Notification No. 1600-2017-0220-R5
Chatsworth Reservoir Wetland/Riparian Mitigation Program

On October 26, 2017, the California Department of Fish and Wildlife (CDFW) received your Notification of Lake or Streambed Alteration (Notification). On November 27, 2017, your Notification was deemed complete.

CDFW is required to submit a draft Lake or Streambed Alteration Agreement (Agreement) to you within 60 calendar days from the date the Notification is complete, if CDFW determines that an Agreement is required for the project. An Agreement will be required if CDFW determines that your project could substantially adversely affect an existing fish or wildlife resource. Therefore, CDFW has until January 26, 2018, to issue you a draft Agreement or inform you that an Agreement is not required.

Please be advised that you may not proceed with any work until CDFW executes an Agreement, informs you that an Agreement is not needed, or does not provide you with a draft Agreement within 60 days of the date your notification was deemed complete.

If you have questions regarding this letter, please contact Brock Warmuth, Environmental Scientist, at 805-962-4698 or by email at brock.warmuth@wildlife.ca.gov.

Sincerely,

Erinn Wilson
Senior Environmental Scientist (Supervisory)

ATTACHMENT R



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, appearing to read "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 black ink that reads "Ray Corbett". The signature is written in a cursive style with a large, looping "R" and "C".

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

ERIC GARCETTI
Mayor

Commission
MEL LEVINE, *President*
WILLIAM W. FUNDERBURK JR., *Vice President*
JILL BANKS BARAD
CHRISTINA E. NOONAN
AURA VASQUEZ
BARBARA E. MOSCHOS, *Secretary*

DAVID H. WRIGHT
General Manager

June 13, 2017

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

Dear Ms. Costa:

This letter is to request that Republic authorize its consultant, JMA, to conduct additional studies as requested by the Native American Consultation survey findings. As discussed in our conference call on May 31, 2017, due to the request from some Tribes for additional studies, Republic/JMA will perform the requested additional studies, with permission from the Los Angeles Department of Water and Power (LADWP).

JMA will conduct additional studies on some or all of the archaeological sites in the Chatsworth Mitigation Project Area (Project Area), including additional survey, testing, and data recovery. There should be monitoring during of all ground-disturbing activity related to the project, and, to the extent possible, Native American tribes that specifically requested that their Tribe be involved with the monitoring should be included in the plan.

LADWP gives Republic permission to perform additional archaeological studies to include Tribes that request to be involved in the monitoring. Additionally, LADWP will allow tribal members who request to collect plants from the Project Area, to do so, subject to the scheduling of appointments and the availability of resources to provide access to the site.

If you have any questions regarding this matter, please contact Ms. Julie Van Wagner, Environmental Supervisor at julie.vanwagner@ladwp.com or me at heidi.hiraoka@ladwp.com.

We look forward to continue working with you on this project.

Sincerely,



Heidi HK Hiraoka
Manager of Property Management

bc: Julie Van Wagner
Chuck Holloway
Mark Sedleck

June 13, 2017

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

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We look forward to continue working with you on this project.

Sincerely,

Heidi HK Hiraoka
Manager of Property Management

ATTACHMENT S



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

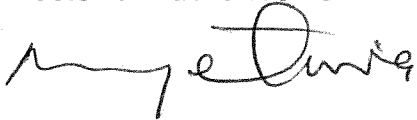
11. The operator shall submit a monthly summary of these records on an annual basis, including a stockpile location map, to Public Works' Environmental Programs Division at the end of each calendar year for the duration of this project.
12. The Director of Public Works, at his/her sole discretion may 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)

ATTACHMENT T

SAN FERNANDO ROAD RETAINING WALL CLEANUP PROJECT

