



# COUNTY OF LOS ANGELES

## DEPARTMENT OF PUBLIC WORKS

*"To Enrich Lives Through Effective and Caring Service"*

GAIL FARBER, Director

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June 2, 2015

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

Dear Mr. Sherman:

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

We reviewed your letter dated April 13, 2015, and the subject proposal dated November 2014 in which you propose to conduct a one-year pilot project using EPI's Enviro™ cover as an alternative daily cover (ADC) in lieu of the 9 inches of soil currently being used for daily cover, as required by the Los Angeles County Department of Public Works (Public Works) pursuant to Condition 45.N of the Conditional Use Permit (CUP) No. 00-194-(5). The letter also indicated that this same proposal received an approval from the Sunshine Canyon Landfill – Local Enforcement Agency (SCL-LEA) on November 26, 2014. The SCL-LEA's approval requires Republic Services to obtain necessary approvals and clearances from other regulatory agencies that have jurisdiction over the site.

According to the proposal, the ADC material would be applied from Monday through Friday. The ADC material would be left in place at the start of the following operating day, and no removal of the ADC material will be conducted. Nine inches of soil would be used at the close of operations on Saturday and would not be removed at the start of operations on Monday mornings.

Upon our review of the project proposal, we have the following comments:

#### **General Comments.**

**A.** Provide an additional section that lists the objectives for this pilot project and the expectations you want to achieve by the end of the one-year project period. Provide a description of certain operational parameters that would change once this ADC material is used on site (e.g. waste-to-cover ratio, in-place densities and landfill capacity

projection for a 1-year period taking into account all types of cover material that will be used at the working face). Additionally, provide a detailed description on how this ADC material, in combination with other cover material(s), will effectively control working face odors once employed, prevent and/or minimize leachate seepage in the system, and enhance the collection efficiency of landfill gases.

**B.** Pursuant to Condition 79 of the CUP, Republic shall notify the Community Advisory Committee, the Granada Hills North Neighborhood Council, and other interested community groups in the immediate vicinity of the facility of the proposed pilot project, its purpose, and objectives, and provide an adequate opportunity for the community to comment on the proposal. Documentation substantiating compliance with this requirement, including community input received, shall be submitted to this office prior to Public Works granting approval to commence the pilot project.

### **Specific Comments:**

**1.0 Introduction (Page 1).** Revise the second to the last sentence to “The geosynthetic panel product will be applied at the end of each operating day (except Saturday and Sunday) and will be left in place at the start of the following day’s operations.”

**3.1 Material Specifications (Page 3).** According to your proposal, “EPI Environmental Products Inc., states that they are unable to continue making environmental claims that the Enviro™ Cover System is “biodegradable”, “degradable”, or decomposable” in the United States as the material does not degrade quickly enough in a landfill environment to meet the requirements of a degradable material published by the Federal Trade Commission.” Explain how using this material as an ADC will enhance the gas collection efficiency and increase the infiltration rate to allow gas migration and leachate percolation through the cover system.

Also, provide the specific model number of the proposed ADC Extended Enviro™ Cover Material that will be utilized in the pilot project. Additionally, an approval shall be obtained from Public Works and other regulatory agencies that have jurisdiction over the site, prior to any changes to the material specification or model number/type of ADC material.

**3.2 Equipment Specifications (Page 5).** Indicate whether the Enviro™ Cover System Deployer Model 800 (ECS Deployer) has been approved by appropriate regulatory agencies (e.g. Air Quality Management District, SCL-LEA, etc.) to be used at the site to deploy the geosynthetic panel material. If the ECS Deployer will be considered as new equipment at the site, discuss any necessary permits required prior to and/or during the use of the ECS Deployer.

**3.3 Material Placement (Page 5).** Provide illustrations and a detailed description of the step-by-step application of the geosynthetic panel product at the working face, including but not limited to the following:

- Areas of the working face where this ADC material and other cover material(s) would be applied.
- Number of lifts per day where this material would be applied.
- Maximum size of the working face where this ADC material would be applied.
- Site plan showing areas where this ADC material is expected to be applied.

**3.4 Material Handling and Storage (Page 6).** Describe whether the ADC material will be placed in an enclosed structure or on an open-spaced area near the working face exposing it to outside elements. If this ADC material would be placed on an open-spaced area near the working face, discuss the maximum allowable time of exposure before it starts to affect the material's shelf-life.

**4.0 Performance Requirements (27 CCR 20690(a)) – Odor (Page 7).** For evaluation purposes, a base line for both areas from the current nine inches of soil cover requirement versus areas where this ADC material will be applied should be established to measure the performance of the pilot project. Performance measurement criteria should include, but not be limited to, surface gas emissions, odor management, odor complaints, and performance of gas wells.

In addition to keeping a log of the incidents of accidental tearing or puncturing of the ADC material occurring upon disposal of new trash on top of the previous day's covered trash, or equipment trucks running on top of the working face, the proposal needs to provide an emergency response plan to mitigate such incidents. Moreover, discuss a response plan to mitigate odor issues should there be a significant increase in odor complaints from the community during this pilot project.

**5.2 Additional Monitoring (Page 8).** In addition to odor monitoring and visual observation of the ADC material, weather data should also be collected on a daily basis and reported in the monthly report specified under **6.0 Reporting** comment. Weather data should include but not be limited to ambient temperature, humidity conditions, wind speed and direction, and rainfall. Furthermore, daily monitoring of vector, blown litter, fire, and scavenging should also be performed.

**6.0 Reporting.** Provide a monthly report 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

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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 your proposal and in this letter must also be provided on the monthly report as specified herein.

**7.0 Commitment to Terminate the Pilot Project.** Revise the first sentence under this section to "The pilot project will be terminated at any time by the Republic Services' Sunshine Canyon Landfill Division Manager, at the direction of the LEA, or the Los Angeles County Department of Public Works, each acting under their respective authority, if the geosynthetic panel material does not perform to meet the stated performance requirements, or if problems arise with the use of this ADC material that cannot be corrected."

Please address these comments and resubmit a revised proposal for further review and approval by the SCL-LEA and Public Works. 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

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cc: Department of Regional Planning (Maria Masis, Iris Chi, Rob Glaser)  
City of Los Angeles Planning Department (Ly Lam, Nicholas Hendricks)  
South Coast Air Quality Management District (Mohsen Nazemi, Ed Pupka)  
Sunshine Canyon Landfill – Community Advisory Committee (Becky Bendikson, Wayde Hunter)  
Sunshine Canyon Landfill – Local Enforcement Agency (Dave Thompson, Gerardo Villalobos)