



Los Angeles County Department of Regional Planning

Planning for the Challenges Ahead



Richard J. Bruckner
Director

January 12, 2015

Margaret Clark, Vice Chair
Los Angeles County Solid Waste Management Committee/
Integrated Waste Management Task Force
900 S Fremont Avenue
Alhambra, CA 91803-1331

Dear Ms. Clark:

REQUEST FOR INFORMATION/UPDATE – EFFORTS BY THE INTERAGENCY WORKING GROUP TO MITIGATE ODORS AT SUNSHINE CANYON LANDFILL

This letter is in response to your letter dated December 11, 2014 regarding odor abatement efforts by member agencies of the Interagency Task Force on Community Odor Mitigation (Interagency Task Force). As you are aware, the Los Angeles County Department of Regional Planning is a member agency of this Task Force.

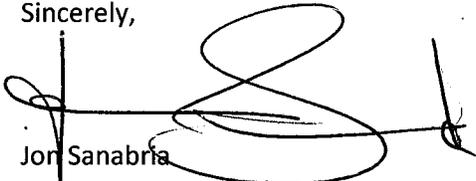
The Department of Regional Planning (DRP) and the Department of City Planning work closely on matters concerning Sunshine Canyon Landfill and the DRP concurs with the written response the City has provided to your Committee, dated December 23, 2014 to the abovementioned letter, specifically:

- The recommendations for odor mitigations provided in the June 27, 2013 letter from the SCL-LEA to the Sunshine Canyon Landfill Board of Directors still have the support of the Department of Regional Planning.
- Odors and landfill gas management mitigations are stipulated in the County's Mitigation Monitoring and Reporting Summary (MMRS) to Conditional Use Permit (CUP) 00-194, section 7.0 (attached). This document identifies public agencies that have jurisdiction regarding the monitoring and enforcement of specific mitigation measures, specifically SCAQMD and the LEA. Planning agencies are not directly involved in air quality enforcement and defer this task to the appropriate agencies.
- Aside from the odor issues, the landfill is at this time in overall compliance with the CUP conditions and MMRS mitigation measures. Air quality monitoring has not shown any evidence of imminent substantial risk to the health, safety, or welfare of the local community. No additional enforcement efforts are planned or warranted by the Department of Regional Planning at this time.

Response to LACSWMC/WMTF Request for Information
January 12, 2015

Both City and County agencies will continue to work collaboratively with the Interagency Working Group to collectively address the odors at the Sunshine Canyon Landfill. Please address any future communications regarding this matter to the SCL-TAC.

Sincerely,



Jon Sanabria
Deputy Director of Planning
Co-chair, SCL-TAC

JS:MM

cc: Supervisor Michael D. Antonovich, Mayor
Supervisor Sheila Kuehl
The Regional Planning Commission – each member
Los Angeles County Integrated Waste Management Task Force and Facility and Plan Review
Subcommittee – each member
Ly Lam, Department of City Planning
Mohsen Nazemi, South Coast Air Quality Management District
Gerry Villalobos, SCL-LEA

**SUNSHINE CANYON LANDFILL
MITIGATION MONITORING AND REPORTING SUMMARY
Conditional Use Permit 00-194-(5) and Oak Tree Permit 86-312-(5)**

	SEIR/FEIR MITIGATION MEASURE	MONITORING ACTION	RESPONSIBILITY	TIMING	REFERENCE
7.0	ODOR/LANDFILL GAS				
7.01	Landfill gases will be prevented from escaping to the atmosphere through control measures which also will effectively control odor. These control measures include (1) small 2 to 3-acre active fill areas, as deemed necessary; (2) covering the working face on a daily basis; (3) filling surface cracks in the cover material with clean dirt; (4) extracting landfill gases through the use of the landfill gas extraction system, and (5) compacting solid waste within 1 hour of its arrival at the working face.	Approval of gas collection system plan and issuance of Permit to Construct and Operate. Review and approval of periodic inspection reports of fill operations.	--SCAQMD --LEA	Permit issuance prior to commencement of landfill development. Monitoring throughout fill operations.	Section 5 of Findings C#7 C#52 IMP-Part X
7.02	The gas collection system will be installed in phases, as each portion of the landfill is filled. The gas collection system will contain a network of gas extraction wells, collection piping and flaring facilities. Because landfill gas generation begins at lower levels of volume and increases with time, the gas will be initially flared until sufficient quantities are available for possible use as a renewable energy resource.	Approval of gas collection system plan and issuance of Permit to Construct and Operate.	--SCAQMD	Permit issuance prior to commencement of landfill development.	Section 5 of Findings C#7 C#52 IMP-Part X
7.03	The following odor/landfill gas monitoring program will be implemented for the landfill. The monitoring program complies with the requirements of the SCAQMD Rule 1150.1 and those of the County Department of Public Works. This program will include: (1) Sample probe installation. Monitoring	Issuance of Permit to Construct and Operate. Monitoring programs conducted by permittee (monthly monitoring reports) and SCAQMD in accordance with permit requirements.	--SCAQMD	Permit issuance prior to commencement of landfill development. Monitoring throughout fill operations.	Section 5 of Findings C#7 C#52 IMP-Part X

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<p>probes will be installed at a spacing of 1,000 feet around the landfill perimeter (where feasible) or as otherwise determined by the SCAQMD. All probes will be monitored to ensure that quantities of landfill gas beyond regulatory standards do not migrate off-site through the subsurface soils;</p> <p>(2) Integrated landfill surface sampling. The landfill surface will be periodically monitored to ensure that the average concentration of total organic compounds over the landfill surface does not exceed the SCAQMD's standard of 50 ppm;</p> <p>(3) Ambient air samples at the landfill perimeter. Periodic, 24-hour integrated gas samples and required meteorological data will be taken to assess any impact the landfill is having on air quality at the landfill perimeter;</p> <p>(4) Instantaneous landfill surface monitoring. Spot checks on the landfill surface will be made to determine the maximum concentration of total organic compounds measured as methane at any one point on the landfill's surface does not exceed the SCAQMD's standard of 500 ppm; and</p> <p>(5) Regular Monitoring and Annual Testing: LFG concentrations at perimeter probes, gas collection system headers, the landfill surface, and in ambient air downwind of the landfill shall be monitored once a month or less frequently as required by the SCAQMD.</p>				

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	The LFG collection system shall be adjusted and improved based on the quarterly monitoring data and annual stack testing results.				
7.04	Risks associated with the gas collection and flaring system shall be mitigated through use of flexible piping, flame arrestors, sensors, and automatic shutoff controls. Numerous safety shutdown devices have been designed and installed into the flare station, including a telephone auto-dialer, to provide emergency notification. All gas extraction equipment, including gas condensate and propane tanks, shall be adequately secured to prevent damage during a seismic event. Inspections of the gas collection and flaring system shall be performed after ground-shaking from an earthquake, and necessary action shall be taken to correct any potential problems.	Approval of gas collection system.	--SCAQMD	Throughout fill operations	Section 5 of Findings C#7 C#52
7.05	Equipment operators involved in excavation shall be made cognizant of the potential presence of existing unrecorded subsurface wellheads. If a wellhead (or other unidentifiable obstruction) is encountered during construction, all excavation activities shall cease. The area will be cordoned off, and the landfill supervisor shall be called to determine whether the obstruction is an abandoned wellhead.	Monitor and adjustment of operations by permittee.	--SCAQMD --LEA --Facility Manager	Throughout fill operations.	Section 5 of Findings C#7 C#52
7.06	If an odor problem should develop, appropriate control measures shall be implemented.	Monitor and adjustment of operations by permittee.	--SCAQMD --LEA	Throughout fill operations.	Section 5 of Findings C#7

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SEIR/FEIR MITIGATION MEASURE	MONITORING ACTION	RESPONSIBILITY	TIMING	REFERENCE
<p>These measures include the application of 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.</p>		--Facility Manager		
<p>7.07 The permittee will recover and sell as much gas as is technically and economically feasible to reduce total air quality emissions from the landfill operations. It is expected that the technical and economic feasibility of commercial recovery and sale of landfill gas as a renewable energy resource will occur at levels below 40 MMCFD. The gas collection system will be installed in increments to allow for maximum gas recovery.</p>	<p>Inclusion of reports of fill operations in Biennial Monitoring Reports to Regional Planning Commission.</p>	--Facility Manager	<p>Throughout fill operations.</p>	<p>Section 5 of Findings C#7 C#52 IMP-Part IV IMP-Part X</p>
<p>8.0 TRAFFIC/CIRCULATION</p>				
<p>8.01 The permittee will install or fund traffic improvements at the landfill entrance and to local feeder highways deemed "warranted" by the City of Los Angeles. Warranted, means justified on the basis of established standards of the City and by accepted traffic engineering practices. As determined by the City, traffic improvements may include: (1) The widening and/or restriping and installation of traffic signals at the landfill entrance located on San Fernando Road, and (2) The restriping of turning lanes at the</p>	<p>Review and approval of intersection improvement plans.</p>	--LADOT	<p>This mitigation measure has been completed. This mitigation measure has been completed. This mitigation measure has been</p>	<p>Section 5 of Findings C#57</p>