



LOS ANGELES COUNTY
SOLID WASTE MANAGEMENT COMMITTEE/
INTEGRATED WASTE MANAGEMENT TASK FORCE
900 SOUTH FREMONT AVENUE, ALHAMBRA, CALIFORNIA 91803-1331
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GAIL FARBER, CHAIR
MARGARET CLARK, VICE - CHAIR

August 4, 2016

Mr. Wayne Nastri
Acting Executive Officer
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, California

**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT'S
PETITION FOR AN ORDER FOR ABATEMENT, CASE NO. 5880-5
INVOLVING THE SUNSHINE CANYON CITY/COUNTY LANDFILL**

Dear Mr. Nastri:

The Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) has reviewed the subject Petition for an Order for Abatement, Case No. 5880-5 (Petition), and would like to express its conditional support for the Agency's action in requiring the Landfill owner/operator, Republic Services, Inc. to effectively mitigate the odor resulting from the Landfill's operation. The residents of the communities neighboring the Sunshine Canyon City/County Landfill have and continue to experience odor nuisance problems for quite some time, and the problem not only persists but has been exacerbated to over several thousand complaints since 2009, and over 200 Notices of Violation being issued by your Agency. The Task Force believes that your Agency's proposed actions would be welcomed by the community.

As background information, the Task Force was formed pursuant to Chapter 3.67 of the Los Angeles County Code and the California Integrated Waste Management Act of 1989 (Assembly Bill 939, as amended). The Task Force is responsible for coordinating the development of all major solid waste planning documents prepared for the County of Los Angeles and the 88 cities in Los Angeles County with a combined population in excess of ten million. The Task Force also addresses issues impacting the system on a countywide basis. The Task Force membership includes representatives of the League of California Cities-Los Angeles County Division, County of Los Angeles Board of Supervisors, City of Los Angeles, waste management industry, environmental groups, the public, and a number of other governmental agencies including, but not limited to, the South Coast Air Quality Management District.

The Task Force has reviewed the subject Petition and would like to offer the following comments and concerns:

General Comments

- As a follow up the Los Angeles Unified School District and action by the Sunshine Canyon City/County Landfill Community Advisory Committee and the enclosed letter of August 2, 2016 from the Task Force, we are requesting that the District in concert with the Los Angeles County Department of Public Health (as the City of Los Angeles & the County of Los Angeles Health Officer) conduct a long-term health risk assessment to be funded by the Respondents (Republic Services, Inc.) to insure protection of health and safety of the Landfill's neighboring residents and children.
- Similar to the previous Petitions issued by the District Hearing Board, there is a chance that the subject Petition may also fail to mitigate the existing landfill odor nuisance which would further negatively impact the Landfill neighboring residents and children. As such, it is strongly recommended that the subject Petition to include a deadline beyond which the landfilling operation would cease. This deadline would give the Respondents (The 2nd largest landfill operator in the world) an incentive to use their own expertise and financial resources to eliminate the odor nuisance at Sunshine Canyon City/County Landfill.

Specific Comments

- On page 2 (line 21), the composition of landfill gas as described herein may not necessarily apply to all areas of the Landfill since methane production does not occur instantly with the disposal of new trash. We suggest this section be revised to state language similar or equal to the following, "During the latter phase of bacterial decomposition, the municipal solid waste disposed of at Sunshine Canyon Landfill generates landfill gas consisting mainly of approximately (50%) methane, approximately (50%) carbon dioxide; and small quantities of Hydrogen Sulfide, Vinyl Chloride and other volatile organic compounds."

Additionally, the landfill gas monitoring needs to be expanded to monitor Hydrogen Sulfide, vinyl chloride and benzene on a weekly basis, as a minimum.

- On page 3 (line 6), please update the number of odor complaints made to the District's hotline to reflect the approximate number of odor complaints from October 2013 to June 2016, which amounts to approximately 4,200 odor

complaints. Further, please indicate that the data provided covers the period after the expiration of the last Order for Abatement on October 25, 2013.

- On Page 5 (lines 5 & 28), please change “CalRecycle” to “Department of Resources Recycling and Recovery (CalRecycle).”
- On page 5 (line 9), please list the titles of the two reports that are referenced in the Petition that were prepared at the direction of the District. Additionally, we suggest these two reports be included as attachments in the Petition as the District is relying on these recommendations for the proposed conditions in the Order for Abatement.
- On page 6 (Section 1.a., line 5), please clarify what the “modified operating hours” are to be at the Sunshine Canyon Landfill, as it is unclear in the Petition. Please note that it cannot be earlier than the hour specified in the Los Angeles County CUP # 00-194-(5), Condition #29.
- On page 7 (Section 1.b., lines 1-12), input from the community is critical in formulating a reduction (if any) in the Landfill’s daily tonnages. The community neighboring the Landfill has been subject to negative impacts of being exposed to the Landfill odor related issues since 2009 and certainly the community deserves to be involved with the process (emphasis added).
- On page 8 (Section 1.d), we suggest including language requiring the Respondents to obtain all necessary approvals and clearances that may be required by other regulatory agencies that have jurisdiction over the Landfill. The SCL-LEA had recently issued an addendum to the May 16, 2016, approval of the Intermediate Cover Enhancement (ICE) Project, which required Republic Services, Inc. to obtain approvals and clearances from the respective regulatory agencies.
- On page 8 (Section 1.e, lines 15-19), the Respondents need to be required to provide regulatory agencies including, but not limited to, the Los Angeles County Department of Public Works with appropriate drawings/plans signed by a California Registered Engineer showing the boundaries of the old Sunshine Canyon Landfill within the City of Los Angeles as well as areas of the old landfill that will no longer accept any more solid waste for disposal. Additionally, Respondents are to provide landfill gas control system(s) for any portion of the closed old landfill to regulatory agencies as well as plans showing the off-site landfill gas monitoring well(s).
- On page 9 (Section 1.h), we suggest including language indicating that all appropriate agencies that have jurisdiction over the implementation of the

Intermediate Cover Enhancement project be included in, collaboratively, making a determination if the ICE project is proven effective and whether it should be expanded, under their own authority.

- It is unclear to this Task Force what the intentions of the District are for referencing the report entitled “Sunshine Canyon Landfill Local Enforcement Agency Compilation of Potential Mitigation Practices and Programs” produced by the Sunshine Canyon Landfill-Local Enforcement Agency (SCL-LEA) as an Exhibit A of this Petition. This SCL-LEA report seems to imply that the nine inches of soil required, as the only approved daily cover material for the Landfill, is the main contributor for the inefficiency of the Landfill’s gas collection and control system and for the accumulation of the sulfates at the site from the use of soil as cover. Our concerns regarding the inclusion of Exhibit A are supported by the following:
 - The use of soil as a daily cover material is a minimum standard requirement of the California Code of Regulations, Title 27, Section 20680; and Code of Federal Regulations, Title 40, Part 258 (Subtitle D of the Resource Conservation and Recovery Act), which states, “... the owners or operators of all municipal solid waste landfill units shall cover disposed solid waste with a minimum of six inches of compacted earthen material at the end of each operating day, or at more frequent intervals if necessary, to control vectors, fires, odors, blowing litter, and scavenging.”
 - Furthermore, Exhibit A of the Petition includes a letter from the County of Los Angeles Department of Public Works to Republic Services dated February 26, 2015, which, in addition to aforementioned State and Federal soil cover requirements, enlisted several references from certified California Environmental Quality Act (CEQA) for the Landfill, Report of Disposal Site Information approved by the SCL-LEA and CalRecycle, and land use approvals by both the City and County of Los Angeles; and documented the use of compacted daily soil cover at the Sunshine Canyon Landfill (emphasis added). Further, since the District as, a “Responsible Agency”, pursuant to the Act has used the certified CEQA document to issue permits to the Respondents, the Task Force greatly would appreciate to have a written response as to the authority used by the District to not implement the certified CEQA’s adopted mitigating measures.
 - It is the sole responsibility of the Landfill operator to perform any necessary operational procedures and landfill practices within the authorities granted by the Landfill’s land use permits, solid waste facility permit, other permits enforced by regulatory agencies that have

jurisdictional enforcement authority over the site, Finding of Conformance with this Task Force, and as required by Federal, State and local regulations and guidelines. Additionally, any adverse impacts that may occur as a result of implementing this soil cover requirement are also the responsibility of the operator.

Thank you for the opportunity to offer comments. If you have any questions regarding this matter, please contact Mr. Mike Mohajer, a Member of the Task Force, at MikeMohajer@yahoo.com or at (909) 592-1147.

Sincerely,



Margaret Clark, Vice-Chair
Los Angeles County Solid Waste Management Committee/
Integrated Waste Management Task Force and
Council Member, City of Rosemead

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Enc.

cc: South Coast Air Quality Management District (Laki Tisopulos, Cher Snyder, Amir Dejbakhsh)
Sunshine Canyon Landfill Local Enforcement Agency (Gerry Villalobos, David Thompson)
Department of Regional Planning (Jon Sanabria, Maria Masis, Susana Franco-Rogan, Tim Stapleton)
Department of Public Health (Angelo Bellomo, Jacqueline Taylor, Maurice Pantoja, Gerry Villalobos)
City of Los Angeles Department of City Planning (Lisa Webber, Ly Lam, Nicholas Hendricks)
Sunshine Canyon Landfill Technical Advisory Committee (Lisa Webber, Jon Sanabria)
Sunshine Canyon Landfill Community Advisory Committee (Wayde Hunter, Gale Gunderson, Joe Vitti)
Each Member of the Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force



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August 2, 2016

Mr. Wayne Nastri
Acting Executive Officer
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, California

Ms. Cynthia Harding
Interim Director
County of Los Angeles Department of Public Health
323 North Figueroa Street
Los Angeles, CA 900022

Dear Mr. Nastri and Ms. Harding:

**HEALTH RISK ASSESSMENT - THE SUNSHINE CANYON CITY/COUNTY
LANDFILL COMMUNITY ADVISORY COMMITTEE (SCL-CAC) – SUPPORT**

The Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) would like to express our supports for the enclosed two motions, which were introduced by the Los Angeles Unified School District and were adopted by the Sunshine Canyon City/County Landfill - Community Advisory Committee (SCL-CAC) at their publicly held meeting on July 14, 2016:

- **Health Risk Assessment Motion** – *“The SCL-CAC requests that the South Coast Air Quality Management District in concert with the County of Los Angeles Department of Public Health (acting as the Los Angeles County and the City of Los Angeles Health Officer) prepare or cause to be prepared a detailed facility-specific health risk assessment which considers all emission sources in order to effectively quantify the potential acute and chronic health impacts associated with the landfill’s operation.”*
- **Odor Mitigation Motion** – *“The SCL-CAC requests that the South Coast Air Quality Management District complete the necessary working face studies to identify and effectively reduce and/or control odiferous emissions; and the Sunshine Canyon Landfill Local Enforcement Agency, The Los Angeles County Department of Public Works and all*

Mr. Wayne Nastri and Ms. Cynthia Harding
August 2, 2016
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responsible agencies to review the efficacy of available topical applications suitable for use in waste hauling operations and require its immediate application.”

As the residents of the communities surrounding the Sunshine Canyon City/County Landfill have experienced odor nuisance problems for quite some time, and the problems have not only persisted but has been exacerbated to over several thousand complaints since 2009, and issuance of over 200 Notices of Violation by the South Coast Air Quality Management District (SCAQMD). Further, the Task Force also believes that the facility may have been in violation of the Title 11 of the Los Angeles County Code, Section 11.02.300, odor nuisance, during the same period too. Accordingly, the Task Force respectfully requests that these motions be seriously taken under consideration, adopted and implemented. The Task Force believes that the results from these studies and assessments will enable the involved agencies to better understand the long-term health risks in the area and identify and promote practical ways of reducing emissions.

For background information, during the first six months of 2016 alone, a total of 758 odor complaints were reported to the SCAQMD and 18 Notices of Violation were issued to the Landfill operator for violation of SCAQMD's Rule No. 402 and California Health and Safety Code Section 41700 “for discharging such quantities of air contaminants to cause injury, detriment, nuisance, or annoyance to a considerable number of persons”.

Pursuant to Chapter 3.67 of the Los Angeles County Code and the California Integrated Waste Management Act of 1989 (Assembly Bill 939), the Task Force is responsible for coordinating the development of all major solid waste planning documents prepared for the County of Los Angeles and the 88 cities in Los Angeles County with a combined population in excess of ten million. Consistent with these responsibilities and to ensure a coordinated and cost-effective and environmentally sound solid waste management system in Los Angeles County, the Task Force also addresses issues impacting the system on a countywide basis.

Should you have any questions regarding this matter, please contact Mr. Mike Mohajer, a Member of the Task Force, at MikeMohajer@yahoo.com or at (909) 592-1147.

Sincerely,



Margaret Clark, Vice-Chair
Los Angeles County Solid Waste Management Committee/
Integrated Waste Management Task Force and
Council Member, City of Rosemead

Mr. Wayne Nastri and Ms. Cynthia Harding
August 2, 2016
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Enc:

cc: Mike Antonovich, Los Angeles County Supervisors, 5th District
Sheila Kuehl, Los Angeles County Supervisor, 3rd District
Mitch Englander, Los Angeles City Council Member (12th District)
South Coast Air Quality management District (Cher Snyder, Laki Tisopulos)
Sunshine Canyon City/County Landfill Technical Advisory Committee
(Jon Sanabria, Lisa Webber)
Los Angeles County Department of Public Health (Angelo Bellomo)
Los Angeles County Department of Public Works (Shari Afshari, Dan Lafferty)
Department of Regional Planning (Maria Masis, Tim Stapleton)
City of Los Angeles Department of City Planning (Nicholas Hendricks, Ly Lam)
Sunshine Canyon Landfill Local Enforcement Agency (Gerry Villalobos,
David Thompson)
Sunshine Canyon Landfill Community Advisory Committee (Wayde Hunter,
Gale Gunderson, Joe Vitti)
Each Member of the Los Angeles County Solid Waste Management
Committee/Integrated Waste Management Task Force



**SUNSHINE CANYON LANDFILL – COMMUNITY ADVISORY COMMITTEE
CITY & COUNTY OF LOS ANGELES**

Ken Ashford (TAC Rep. Alternate), Jeanette Capaldi (Vice Chair), Laine Caspi, Steven Friedman, Gale Gundersen (Secretary),
Wayde Hunter (Chair), Josh Jordahl (Treasurer), Debbie Pietraszko, Joe Vitti (TAC Representative)

July 24, 2016

South Coast Air Quality Management District,
21865 Copley Drive,
Diamond Bar, CA 91765-4128
Attention: Cher Snyder
Assistant Deputy Executive Officer, Engineering & Compliance

Re: Motions SCL-CAC Meeting July 2016

Dear Ms. Snyder:

At our regularly scheduled SCL-CAC Meeting in May 2016 there were the following two (2) motions posed by the Los Angeles Unified School District (LAUSD) regarding Republic/BFI's Sunshine Canyon Landfill that were discussed, and subsequently brought back, and approved unanimously by the SCL-CAC Committee members at our July 14, 2016 SCL-CAC Meeting. I was also directed to forward the adopted motions to the South Coast Air Quality Management District (SCAQMD) for the prompt consideration and effective action regarding the subject Landfill and implementation of the following measures to protect the health and safety of the neighboring children and the community as well as the environment.

(MOTION): Health Risk Assessment

Whereas, The Sunshine Canyon Landfill–Community Advisory Committee (SCL-CAC) notes the recent report from the South Coast Air Quality Management District that emissions from the landfill are below screening levels whereby a detailed facility-specific health risk assessment is not required.

Whereas, The SCL-CAC recognizes the limitations associated with the various agency rules and regulations governing Sunshine Canyon Landfill's operations and notes their inadequacy to effectively quantify the impacts from the facility's emissions.

Whereas, These inadequacies include but are not limited to the exemption of on and off-road mobile equipment used to transport refuse to and from the landfill, spread refuse along the landfill's working face and traverse the landfill to perform maintenance/repair and related activities.

Whereas, The SCL-CAC is cognizant of the numerous permit and fugitive sources that cumulatively comprise the emissions associated with Sunshine Canyon Landfill's operations but have not been

considered in assessing their impact on the health of those that live and work within the local community.

Therefore be it resolved, That the SCL-CAC request that the South Coast Air Quality Management District in concert with the County of Los Angeles Department of Public Health (acting as the Los Angeles County and the City of Los Angeles Health Officer) prepare or cause to be prepared a detailed facility-specific health risk assessment[±] which considers all emission sources in order to effectively quantify the potential acute and chronic health impacts associated with the landfill's operation.

(MOTION): Odor Mitigation

Whereas, The Sunshine Canyon Landfill–Community Advisory Committee (SCL-CAC) has seen the proliferation of odors emanating from the Sunshine Canyon Landfill where both local residents and the Van Gogh Charter School community have filed numerous complaints with the South Coast Air Quality District.

Whereas, Numerous odor control strategies have been implemented yet odors from the landfill still persist.

Whereas, Only cursory attention has been given to the odors associated with the delivery of refuse and subsequent deposition along the landfill's working face which are specific to complaints of fresh trash odors during morning daylight hours.

Whereas, A 2011 report prepared for the South Coast Air Quality Management District to assess the extent of working face odors and their control were found inconclusive whereby additional data analysis and recommendations to control these odors was scheduled for inclusion in subsequent reports but was never conducted.

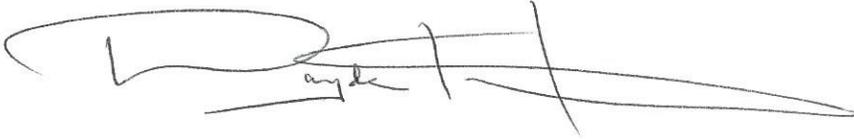
Whereas, Current technologies exist whereby topical applications such as Odor-Shell are used to reduce or eliminate fresh trash odors during transit and initial deposition of daily refuse but have never been considered.

Therefore be it resolved, That the SCL-CAC requests that the South Coast Air Quality Management District complete the necessary working face studies to identify and effectively reduce and/or control odiferous emissions; and finally...

Be it resolved, that the Sunshine Canyon Landfill Local Enforcement Agency, The Los Angeles County Department of Public Works and all responsible agencies review the efficacy of available topical applications suitable for use in waste hauling operations and require its immediate application.

If you should have any questions of a technical nature regarding these motions* please contact Bill Piazza, Environmental Assessment Coordinator, Los Angeles School District, Office of Environmental Health & Safety, Tel: (213) 241-2576, Fax: (213) 241-6816, Cell: (213) 392-1879.

Sincerely,

A handwritten signature in black ink, appearing to read "Wayde Hunter", with a large, sweeping horizontal stroke underneath.

Wayde Hunter
Chair, SCL-CAC
(818) 363-3597 WHunter01@aol.com

c.c.

Mike Antonvich, Los Angeles County Supervisor, 5th District
Sheila Kuehl, Los Angeles County Supervisor, 3rd District
Mitch Englander, Los Angeles City Councilman, 12th District
Cynthia Harding, Interim Director, Los Angeles County Department of Public Health
Gail Farber, Director, Los Angeles County Department of Public Works
Jerry Villalobos & David Thompson, Program Managers, Sunshine Canyon Landfill-Local Enforcement Agency (SCL-LEA)
Jon Sanabria & Lisa Webber, Co-Chairs, Sunshine Canyon Landfill-Technical Advisory Committee (SCL-TAC)
Bill Piazza, Enviro Assessment Coordinator, LAUSD
Margaret Clarke, Chair, Los Angeles County Solid Waste Management Committee/ Integrated Waste Management Task Force