



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**

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.

Mr. Rob Sherman
October 27, 2015
Page 2

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.

Mr. Rob Sherman
October 27, 2015
Page 3

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 (SO₄) 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