



LOS ANGELES COUNTY
SOLID WASTE MANAGEMENT COMMITTEE/
INTEGRATED WASTE MANAGEMENT TASK FORCE
900 SOUTH FREMONT AVENUE, ALHAMBRA, CALIFORNIA 91803-1331
P.O. BOX 1460, ALHAMBRA, CALIFORNIA 91802-1460
www.lacountyiswmtf.org

GAIL FARBER, CHAIR
MARGARET CLARK, VICE CHAIR

March 14, 2011

Wayne Tsuda, Program Manger
City of Los Angeles Local Enforcement Agency Program
City of Los Angeles Department of Building & Safety
3550 Wilshire Boulevard, 18th Floor, MS 115
Los Angeles, CA 90010

Dear Mr. Tsuda:

**ENFORCEMENT - POSTCLOSURE MAINTENANCE PLAN REQUIREMENTS
CITY OF LOS ANGELES SUNSHINE CANYON LANDFILL UNIT 1 (19-AA-2000)**

The Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) is requesting the Local Enforcement Agency (LEA) to look into the status of compliance with the vegetation plan as part of the postclosure maintenance requirements of the Sunshine Canyon Landfill – City Unit 1.

The Task Force has been monitoring Republic Services, Inc.'s (Republic), efforts in vegetating various slopes within the Landfill site including the inactive portions of the Landfill. While the Task Force commends Republic for their improved overall efforts in vegetating the Landfill, particularly over the last two years, the Task Force continues to be concerned about the difficulty in establishing native plant growth on City Unit 1. The inspection report dated January 23, 2011, by the Landfill's biologist, Mr. Greg Ainsworth, described City Unit 1 as "barely covered" and "sparse cover of native plants from seed mix." As you may know, representatives of communities in the vicinity of the Landfill have expressed concerns at Task Force meetings regarding the lack of vegetation at City Unit 1 since the facility ceased its operation in 1991.

In CalRecycle's (formerly the California Integrated Waste Management Board) letter to Browning-Ferris Industries on May 18, 2006, the final closure reports for City Unit 1 were found to be complete as required by State closure regulations, and contingent upon approvals by the City of Los Angeles LEA and the Regional Water Quality Control Board (Enclosure 1). On April 18, 2008, the California Regional Water Quality Control Board, Los Angeles Region, directed Browning-Ferris Industries to submit a Vegetation Plan including a vegetation monitoring and maintenance program and a timeline within

Mr. Wayne Tsuda
March 14, 2011
Page 2

which the Vegetation Plan would be implemented (Enclosure 2). Subsequently, a Vegetation Plan was submitted and approved by the Sunshine Canyon Landfill LEA (SCL LEA), and the closure plan for City Unit 1 was amended to include the Vegetation Plan. In a letter to the City of Los Angeles Planning Department, dated January 9, 2009, the SCL LEA determined that City Unit 1 was officially closed (Enclosure 3).

Considering the Landfill's postclosure maintenance activities are under the SCL LEA's enforcement purview and there is an approved Vegetation Plan for City Unit 1, the Task Force requests that the SCL LEA look thoroughly into the status of Republic's compliance with the postclosure maintenance requirements for City Unit 1 and the necessity for enforcement actions for the lack of vegetative development such as issuing a violation of the Closure and Postclosure Maintenance Plans.

Pursuant to Chapter 3.67 of the Los Angeles County Code and the California Integrated Waste Management Act of 1989 (AB 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 10 million. Consistent with these responsibilities, and to ensure a coordinated, 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. The Task Force membership includes representatives of the League of California Cities-Los Angeles County Division, the County of Los Angeles Board of Supervisors, the City of Los Angeles, the waste management industry, environmental groups, the public, and a number of other governmental agencies.

Mr. Wayne Tsuda
March 14, 2011
Page 3

The Task Force respectfully requests a written response at your earliest convenience. If you have any questions, please contact Mr. Mike Mohajer of the Task Force 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

LL:ts

P:\eppub\ENGLAN\TASK FORCE\Letters\LEA_City_Unit 1_03-14-10.doc

Enc. (3)

cc: CalRecycle (Mark Leary, Ted Rauh, Mark De Bie)
Los Angeles Regional Water Quality Control Board (Samuel Unger, Wen Yang)
Sunshine Canyon Landfill Local Enforcement Agency (Wayne Tsuda, Cindy Chen)
Board of Directors of Sunshine Canyon Landfill Local Enforcement Agency
County of Los Angeles Department of Regional Planning (Richard Bruckner,
Maria Masis)
City of Los Angeles Department of City Planning (Michael LoGrande, Ly Lam)
County of Los Angeles Department of Public Works (Pat Proano)
Sunshine Canyon Landfill Community Advisory Committee (Becky Bendikson,
Wayde Hunter)
Each Member of the Los Angeles County Integrated Waste Management Task Force
and Facility & Plan Review Subcommittee



Dan Skopec
Acting Secretary for
Environmental
Protection

California Integrated Waste Management Board

Margo Reid Brown, Chair

1001 I Street • Sacramento, California 95814 • (916) 341-6000
Mailing Address: P. O. Box 4025, Sacramento, CA 95812-4025
www.ciwmb.ca.gov



Arnold Schwarzenegger
Governor

May 18, 2006

Mr. Dave Edwards
Browning-Ferris Industries/
Allied Industries
14747 San Fernando Road
Sylmar, California 91342

Final Closure and Construction Quality Assurance Reports for Sunshine Canyon City Landfill, Unit I, City of Los Angeles, Facility No. 19-AR-0002

Dear Mr. Edwards:

The California Integrated Waste Management Board (Board) has completed the review of the documents addressing final closure certification for the aforementioned facility. Our review included the following documents:

1. Construction Quality Assurance Report for Evapotranspirative Final Cover Grading, Sunshine Canyon Landfill. (December 2003)
2. Construction Quality Assurance Report for Construction of the Stormwater Retention Basin and Surface Water Drainage System Improvements Project, Sunshine Canyon City Landfill. (December 2004)
3. Moisture Monitoring Equipment Installation and Calibration, Sunshine Canyon City Landfill, Unit I. (June 2005)

Based on the information included in the reports, Board staff find the landfill closure adequate and complete as required by the Board closure regulations. However, in order for the site to be considered "officially" closed and transitioned into the period of postclosure maintenance, the City of Los Angeles Environmental Affairs Department and the Central Valley Regional Water Quality Control Board (Regional Water Board) staff must also act on all three reports (it is CIWMB staff understanding that these agencies have postponed their approval of report No. 3 until completion of the moisture monitoring program).

Should you have any questions or comments concerning this matter, please contact Mr. Peter Janicki at (916) 341-6315.

Sincerely,

[Handwritten signature]

Scott Walker, P.E., Manager
Closure, Remediation and Technical Services Branch
Permitting and Enforcement Division

cc: Mr. Rod Nelson
Los Angeles Regional Water Quality Control Board
320 W. 4th Street, Suite 200
Los Angeles, CA 90013

Mr. David Thompson
City of Los Angeles Environmental Affairs Department
200 N Spring Street, Room 1905 MS 177
Los Angeles, CA 90012

California Environmental Protection Agency

 Printed on Recycled Paper

Join Governor Schwarzenegger to Keep California Rolling.
Every Californian can help to reduce energy and fuel consumption. For a list of simple ways you can reduce demand and cut your energy and fuel costs, Flex Your Power and visit www.fypower.com.



California Regional Water Quality Control Board

Los Angeles Region



Recipient of the 2001 *Environmental Leadership Award* from Keep California Beautiful

Linda S. Adams
Agency Secretary

320 W. 4th Street, Suite 200, Los Angeles, California 90013
Phone (213) 576-6600 FAX (213) 576-6640 - Internet Address: <http://www.waterboards.ca.gov/losangeles>

Arnold Schwarzenegger
Governor

April 18, 2008

Mr. Dave Hauser, General Manager
BFI, Sunshine Canyon Landfill
14747 San Fernando Road
Sylmar, CA 91342

CONDITIONAL APPROVAL OF FINAL COVER CONSTRUCTION - SUNSHINE CANYON CITY LANDFILL UNIT 1, SYLMAR, CALIFORNIA (FILE NO. 58-076)

Dear Mr. Hauser:

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board), has received from Browning Ferris Industries (BFI) a report titled "*Third Year Moisture Monitoring Performance Report with Responses to comments from Los Angeles Regional Water Quality Control Board Letter Dated July 19, 2007, Sunshine Canyon City Landfill, Sylmar, CA*" (Report), prepared by GeoLogic Associates (GLA) and dated March 18, 2008. The Report was submitted to meet the requirements of California Code of Regulations, title 27 (27 CCR), that are applicable to the final cover system of the Sunshine Canyon City Landfill Unit 1 (Unit), which is part of BFI's Sunshine Canyon Landfill Facility in Sylmar, California.

The Unit was operated from 1958 to 1991 as a municipal solid waste (Class III) landfill and was closed in October 2003 with an "alternative" final cover system that consists of a six-foot thick monolithic soil layer. In order to evaluate the performance of the final cover system, BFI installed five soil moisture monitoring stations at the Unit and has been collecting soil moisture data in the final cover system since February 2005. Data collected at the stations were summarized in two reports that were submitted to the Regional Board on June 5, 2006 (First Year Report), and June 19, 2007 (Second Year Report), respectively. In a letter dated July 19, 2007 (copy attached), Regional Board staff commented on the Second Year Report. The Third Year Report addresses Regional Board comments and incorporates soil moisture monitoring data and soil permeability data collected after the submittal of the Second Year Report and additional computer modeling using the Hydrologic Evaluation of Landfill Performance (HELP) and Leaching Estimation and Chemistry Model (LEACHM) programs.

Regional Board staff has reviewed the data submitted, including the three moisture monitoring reports and a Construction Quality Assurance Report that BFI submitted to the Regional Board on March 4, 2004, and determined that the alternative final cover system for the Unit meets the requirements of 27 CCR, section 21090(a), which states, in part, that the alternative final cover systems shall "*continue to isolate the waste in the Unit from precipitation and irrigation waters at least as well as would a final cover built in accordance with applicable prescriptive standards.*" The construction and evaluation of the alternative final cover system is therefore approved, with the conditions described in the following paragraph:

California Environmental Protection Agency



Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.

Dave Hauser
Sunshine Canyon Landfill

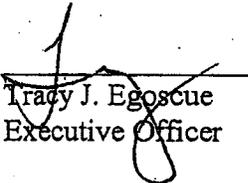
- 2 -

April 18, 2008

To address the concern that several areas of the Unit exhibit poor vegetative development, the Third Year Report includes a Revegetation Proposal that was prepared for BFI by the Chambers Group, Inc. In accordance with Regional Board Order No. R4-2003-0155, which contains waste discharge requirements (WDRs) for the Sunshine Canyon City Landfill, BFI is required to continue postclosure maintenance at the closed Unit. As part of postclosure requirements, you are directed to submit a revegetation plan, as proposed in the Third Year Report, to the Regional Board by July 18, 2008, for the approval of the Regional Board Executive Officer. At a minimum, the revegetation plan shall include soil sampling and testing data with an emphasis on soil nutritional needs of targeted plant species, proposed vegetation communities that will be developed on the slopes and top decks of the Unit, a vegetation monitoring and maintenance program, and a time schedule that the revegetation plan will be implemented.

If you have any questions regarding the above, please contact Dr. Wen Yang at (213) 620-2253.

Sincerely,


Tracy J. Egoscue
Executive Officer

Enclosure

cc: Peter Janicki, California Integrated Waste Management Board, Sacramento
William Marciniak, California Integrated Waste Management Board, Los Angeles
Pete Oda, Los Angeles County, DHS
David Thompson, City of Los Angeles, Environmental Affairs Department
Eugene Tseng, City of Los Angeles, Environmental Affairs Department
Wayde Hunter, North Valley Coalition
Gary Lass, GeoLogic Associates
M. Ali Mehrazarin, A-Mehr Inc.

California Environmental Protection Agency

 Recycled Paper

Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.

SUNSHINE CANYON LANDFILL



LOCAL ENFORCEMENT AGENCY

14747 San Fernando Road
Sylmar, California 91343

January 9, 2009

Ms. Gail S. Goldberg, General Manager
 City of Los Angeles
 City Planning Department
 200 N. Spring Street, 5th Floor
 Mail Stop 395
 Los Angeles, CA 90012

Subject: Sunshine Canyon Landfill (19-AA-2000)
Completion of Closure Construction

Dear Ms. Goldberg,

The Sunshine Canyon Landfill Local Enforcement Agency (SCL LEA) is reporting to the Sunshine Canyon Landfill City Technical Advisory Committee that Allied Waste has completed closure construction in the areas where new waste will overlie portions of the inactive landfill at Sunshine Canyon Landfill.

In summary:

- The final cover construction and grading was completed in October 2003 and a Construction Quality Assurance report was submitted to the City LEA. After reviewing this document the LEA approved the final cover grading in April 12, 2004. A condition of the final closure plan was the installation of moisture monitoring equipment to ensure that the performance of the evapotranspirative monolithic soil cover.
- After a three year reporting period, the results indicated that the performance was conforming to regulations and the LEA approved the document with the provision that a vegetative plan be completed and implemented prior to the LEA deeming Sunshine Canyon City Landfill – Unit 1 closed.
- Allied Waste subsequently submitted the Sunshine Canyon Landfill Vegetation Plan to the SCL LEA and was approved on August 28, 2008. In December 2008, the SCL LEA received an application to amend the closure plan to include the Vegetation Plan. The SCL LEA has approved this amendment to the closure plan and will be submitting it to the Regional Water Quality Control Board and the California Integrated Waste Management Board for concurrence.

Therefore, the SCL LEA has made the determination that Allied Waste has fulfilled all closure construction requirements for Sunshine Canyon City Landfill – Unit 1 and that this unit is officially closed.

If you have any questions regarding the closure status, please contact me at (213) 978-3068.

Sincerely,

Wayne Tsuda, Program Manager
 Sunshine Canyon Landfill Local Enforcement Agency

cc: David Thompson Ly Lam
 Larry Friedman Dave Hauser