

September 14, 2017

TO: Facility and Plan Review Subcommittee Members

FROM: Michael Harmon
Environmental Programs Division

**PROPOSED FINDING OF CONFORMANCE
CALABASAS LANDFILL**

The County Sanitation Districts of Los Angeles County (CSD) submitted an application on April 14, 2016, to the Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) for a Finding of Conformance for the Calabasas Landfill (Landfill). The request is in accordance with the requirements of the approved Los Angeles County Countywide Siting Element (CSE), dated June 1997.

Our staff reviewed the application for consistency with the CSE and Task Force's guidelines. Based on the review, staff finds the project for the Calabasas Landfill to be in conformance with the CSE and recommends approval of the Finding of Conformance (FOC).

I. Background

The Landfill is an existing Class III municipal solid waste landfill located within the unincorporated area of Agoura in Los Angeles County (Figure 1-1). It is owned by the County of Los Angeles and operated by CSD under a Joint Powers Agreement. The Landfill began its disposal operations in February 1961 and is currently operating under a wasteshed restriction, adopted October 1990, which allows it to receive wastes from cities of Calabasas, Hidden Hills, Agoura Hills, Malibu, Westlake Village, and Thousand Oaks, a portion of the City of Los Angeles, and certain unincorporated areas of Los Angeles and Ventura counties (Attachment A and Figure 1-2).

The current project area, including the stockpile/borrow areas, buffer zones, and the refuse footprint occupies 491 acres of land. The maximum permitted vertical elevation of the Landfill is not to exceed 1,360 feet above mean sea level. The Landfill operates under Solid Waste Facility Permit (SWFP) 19-AA-0056 (see Attachment B) and Waste Discharge Requirements (WDR) Order No. 82-67 and in compliance with WDR Order No. R4-2006-0007, No. R4-2008-0013, No. R4-2009-0088, and No. R4-2011-0052. The National Parks Service (NPS) re-approved the facility's Special Use Permit (SUP) No. PWR-SAMO-5700-2013-K015 (see Attachment C), for a 5-year period beginning on November 14, 2013.

The County of Los Angeles Regional Planning Commission approved the Land Use Zone Exception Case No. 3349-5 on June 27, 1958, and subsequent land use permits Nos. 8477-5 and 5022-5 on August 28, 1967, and August 8, 1972, respectively. In 2007 the County of Los Angeles approved a revised Exhibit "A" (Attachment D).

In addition to accepting non-hazardous solid and inert wastes, during the period of September 1965 through July 1980, a portion of the Landfill operated under permit as a Class I disposal facility that accepted hazardous (Class I) and liquid (Class II) wastes (Attachment E). In August 1982, the Regional Water Quality Control Board (RWQCB) issued new Waste Discharge Requirements (WDR) Order No.82-67 (Attachment F) that reclassified the entire landfill as a Class III facility

The Finding of Conformance is required due to the revision of the Solid Waste Facility Permit. The permit revision consists of:

- A change to the permitted hours of ancillary operations at Landfill from 8 a.m. to 6 p.m. to 5 a.m. to 7 p.m.
- An adjustment of the permitted facility boundary to reflect land conveyance to the City of Calabasas.
- A correction to the acreage of the refuse fill plan from 416 acres to 305 acres.

The current permitted hours of operation to receive wastes from 8 a.m. to 5 p.m. will not be affected by the permit revision. Additionally, the permit revision does not include any vertical or horizontal expansions of the permitted disposal boundaries.

II. Request unto the Task Force

The CSD is requesting Task Force to consider issuance of an FOC for the project pursuant to Section 10.1 of the CSE, dated June 1997.

III. Item History

The Calabasas Landfill has no previous history of FOC issued by the Task Force. The Landfill was grandfathered into the Los Angeles County Solid Waste Management Plan.

IV. Options for the Task Force

The Task Force may:

1. Grant the FOC subject to the "Conditions of Approval" specified in this report;
2. Grant the FOC with changes/modifications; or
3. Deny the FOC and state reasons for denial.

V. Staff's Conclusion and Recommendation

Staff has reviewed the CSD's application for compliance with the requirements for granting an FOC as established in the Countywide Siting Element. It is staff's opinion that the application met all the requirements, therefore, recommends granting the FOC subject to the "Conditions of Approval" specified in this report.

VI. Project Summary and Findings

Name: Calabasas Landfill

Facility Type: Class III Landfill (Municipal Solid Waste)

Location: 5300 Lost Hills Road, Agoura, CA 91301

Setting: The Landfill is located within the unincorporated area of Agoura.

Operational Status: Permitted and active

Waste Type: Non-hazardous municipal solid waste

Current Average Daily Operating Capacity: 1,144 tons per day(tpd) (Fiscal Year 2016-17)

Currently Permitted: Calabasas Landfill

Acreage and Design Capacity:

	Facility Acreage	Disposal Acreage	Design Capacity	Remaining Capacity	Permitted Daily Capacity for MSW (tpd)	Estimated Remaining Life	Expected Closure Date
Calabasas Landfill (SWFP 19-AA-0056 (2009))	505	416	N/A	25.4 million cy (11.4 million tons ²) as of 9/7/2000 ³	3,500	19 years	2028
Project (revised permit SWFP 19-AA-0056 (2016) as described in the FOC application)	491 ¹	305 ¹	69.3 million cy as of 4/4/2016 ⁵ (31 million tons ²)	13.9 million cy (6.20 million tons ²) as of 1/1/2016 ⁴	3,500	13 years ⁶	2029

Notes:

1. FOC application, dated April 14, 2016, based on recent landfill surveys, the correct permitted refuse footprint (disposal acreage) is 305 acres instead of 416 acres. Also, the facility acreage is reduced from 505 acres to 491 acres due to land conveyance to the City of Calabasas.
2. A conversion factor of 0.449 tons per cy is used.
3. Information based on Solid Waste Facility Permit 19-AA-0056, issued in August 11, 2009.
4. Information based on FOC application, dated April 14, 2016.
5. Information based on Solid Waste Facility Permit 19-AA-0056, issued in April 4, 2016.
6. Estimated remaining life based on current average daily operating capacity rate is 16 years.

Existing

Permitted Hours: 8:00 am to 5:00 pm Monday through Saturday (Receipt of solid waste).

7:30 am to 6:00 pm Monday through Saturday (Ancillary operations).

Owner: The legal name of the owner of the land is the County of Los Angeles.

Operator: The legal name of the operator of the facility is County Sanitation Districts of Los Angeles County.

Local Enforcement

Agency: County of Los Angeles Department of Public Health.

Project Schedule: The permit revision to the approved SWFP 19-AA-0056 became effective on April 4, 2016.

VII. Staff Analysis

Staff has reviewed the proposal and offers the following:

1. Compliance with the California Environmental Quality Act and National Environmental Policy Act

The Landfill began operations in February 14, 1961, prior to the enactment of the California Environmental Quality Act (CEQA) and is currently operating under a National Environmental Policy Act (NEPA) document, SUP No. PWR-SAMO-5700-2013-K015, reissued by the NPS on November 14, 2013, (Attachment C). Since then, for projects implemented at the Landfill after the adoption of CEQA, the CSD has complied with CEQA requirements through the preparation of Notices of Exemption and Negative Declarations.

In March 2007, the CSD filed a Negative Declaration for the Calabasas Landfill Gas-To-Energy (GTE) facility to convert a stream gas flow from the flaring station into gas turbines for the purposes of renewable bioenergy. The GTE facility is located on the western portion of the landfill site and has been operational since July 2010.

On December 16, 2014, the CSD filed a Notice of Exemption for change in hours of ancillary operations (from 8 a.m. to 6 p.m. to 5 a.m. to 7 p.m.). Expanding the hours of ancillary operations simply allows these activities to occur within a 13.5-hour period instead of a 10-hour period, resulting in no changes in the overall daily impact.

The CSD, acting as a responsible agency, also filed a Notice of Determination relating to the sale of an excess parcel of the Landfill's property for the purpose of the Lost Hills Road/US-101 Lost Hills Road Overcrossing Replacement and Interchange Modification Project. The sale was addressed in the Mitigated Negative Declaration/Finding of No Significant Impact Environmental document for the Lost Hills Road/US-101 Lost Hills Road Overcrossing Replacement and Interchange Modification Project. The lead agency for the environmental document was the City of Calabasas and Caltrans.

As part of the permit revision, the CSD also made an administrative adjustment in the refuse footprint that reduces the permitted disposal area from 416 acres to 305 acres. This change was made to accurately reflect actual field conditions and will not result in changes to the landfill operation or associated environmental impacts. Consequently, no CEQA action is required and no CEQA document was filed.

2. General Plan Consistency and Land Use

The Countywide General Plan Land Use Policy map designation for the subject property is Non-Urban. As mentioned above, the Los Angeles County Regional Planning Commission approved Land Use Zone Exception Case No. 3349-5 on June 27, 1958, and subsequent land use permits Nos. 8477-5 and 5022-5 on August 28, 1967, and August 8, 1972, respectively. Currently, the landfill is operating under the active land use permit No. 5022-5 (see Attachment D).

Additionally, the facility is operating under the National Parks Service Special Use Permit No. PWR-SAMO-5700-2013-K015 (see Attachment C) issued November 14, 2013. The facility is required to meet with the NPS every five years to demonstrate compliance with the terms of the SUP. As of the date of this report, the CSD is scheduled to meet with NPS staff in September 2017 to initiate the 2018 renewal process.

3. Solid Waste Facility Permit (SWFP)

The Calabasas Landfill currently operates under SWFP No. 19-AA-0056, which was issued on April 4, 2016, (Attachment B).

4. Waste Discharge Requirements (WDR)

The Calabasas Landfill currently operates under WDR Order No.82-67 issued on August 25, 1982, (see Attachment F) and in compliance with General WDR Order Nos. R4-2006-0007, R4-2008-0013, R4-2009-0088, and R4-2011-0052, which were adopted by the State Water Resources Control Board, Los Angeles Region.

5. Consistency with Los Angeles County Countywide Siting Element/Countywide Integrated Waste Management Plan

The CSE identifies potential new landfills, expansions of existing landfill areas, and existing waste disposal facilities that institute a “significant change” to their operation where the siting criteria may be applicable for the development of additional Class III landfill disposal capacity. Prior to development of these facilities, the facility proponent is required to demonstrate that the project is in conformance with the CSE. As a part of the determination of conformance with the CSE and its Siting Criteria, the project proponent must obtain an FOC from the Task Force.

A. Goals and Policies

Staff has reviewed the FOC application and finds that subject to the conditions stipulated herein, development of the project is in accordance with the goals and policies of the CSE/ColWMP, specifically:

- i. Promotion of policies to enhance in-County landfill disposal capacity.
- ii. Promotion of land use policies to discourage incompatible land uses between existing, expansion of existing, and new solid waste management facilities identified in the Siting Element and adjacent areas.

The facility will be developed in accordance with the land use permits Nos. 3349-5, 8477-5, and 5022-5 approved by the County of Los Angeles and the SUP No. PWR-SAMO-5700-2013-K015 approved by the NPS.

- iii. Promotion of policies, which would ensure that all new or expansions of existing solid waste disposal facilities and any existing solid waste

disposal facilities conform to the siting criteria and obtain a revised FOC whenever a revised/modified solid waste facility permit is required. See staff's evaluation of Siting Criteria (Attachment G).

- iv. Implementation of salvage/diversion operations to recover those waste materials that can be feasibly and economically reused, recycled, or composted.

The facility is required to comply with the Los Angeles County Source Reduction and Recycling Element of the County of Los Angeles Countywide Integrated Waste Management Plan.

B. Evaluation of Siting Criteria

The Calabasas Landfill is subject to zoning requirements of the SUP No. PWR-SAMO-5700-2013-K015 and Los Angeles County's Land Use Permits Nos. 3349-5, 8477-5, and 5022-5. Land uses adjacent to the facility are included in Exhibit A (Attachment H) and include: residential, business/commercial, public facility, and open space.

The Saratoga Hills housing development is located to South of the facility and contains 60 residential dwelling structures within 1000 feet of the limit of fill. Construction of the residences in this portion of the development took place between late-1960s to mid-1970s prior to the establishment of the regulatory requirement to construct natural or manmade combustible gas mitigation systems in structures within 1,000 feet of a land disposal facility. The gas control system at Calabasas Landfill is designed to prevent subsurface gas migration or the release of landfill gas to the atmosphere. The collection infrastructure directs the flow of gas through the system toward the GTE facility and/or flare station at the western portion of the facility, away from the residences. Additionally, the highest density of perimeter gas monitoring probes is found at the site boundary between the facility and the adjacent residences as provided in the Design and Construction Standards for Perimeter Monitoring Wells and Probes (see Attachment I and Figure 5-9).

Staff reviewed the information provided by the project proponent and find that the proposal, in concert with SUP No. PWR-SAMO-5700-2013-K015 and mitigation measures identified in the Final Supplemental Environmental Impact Report, adequately satisfies the CSE's Siting Criteria. See Facility Siting Criteria Evaluation Form (Attachment G).

VIII. Conditions of Approval

Staff recommends granting the FOC subject to the following conditions:

1. Effective Date – This FOC shall become effective upon approval by the Task Force.
2. Permitted Operations/Activities - This FOC is limited to landfilling activities and other waste management operations for the Calabasas Landfill project in accordance with the Landfill's land use permit and SUP No. PWR-SAMO-5700-2013-K015, which was approved by the National Parks Service on November 14, 2013, (Attachment C). Any approvals, revisions, or revocations of this SUP or subsequent SUP's, should be brought to the attention of the Task Force to determine if any changes in facility operation require reconsideration of an FOC.
3. Types of Waste Materials – The waste materials to be processed and/or landfilled at the subject site are limited to non-hazardous solid waste, as defined in Title 27, California Code of Regulations (CCR), Section 20220(a) and inert wastes as defined in Title 27, CCR, Section 20230(a). The following waste materials are prohibited at the Landfill including; hazardous waste (as defined in Title 22, CCR Article 1, Chapter 11, Division 4.5), asbestos containing waste, liquid or semi-solid waste, special waste (medical waste), designated wastes (as defined in Title 27, CCR, Section 20210), or radioactive wastes (as defined by the California Department of Public Health, Radiologic Health Branch). The landfill will not accept incinerator ash, sewage sludge, or any waste stream prohibited under Title 36 FR Part 6.5 in accordance with the SUP issued by the NPS on November 14, 2013.
4. Waste Quantities - The materials received at the facility shall be subject to the following:

Maximum daily solid waste disposed within the disposal footprint of the landfill shall not exceed 3,500 (tpd), excluding soil received for cover material.
5. Hours of Operation - The hours of operation for solid waste disposal activity at the site shall be 8 a.m. to 5 p.m., Monday through Saturday. Ancillary facility operating hours are permitted between the hours of 5:30 a.m. to 7 p.m. Monday through Saturday.
6. Limits of Fill - Total horizontal boundaries and vertical boundaries (as identified by contours) of the landfill shall be as approved by the County of Los Angeles Department of Regional Planning in 2007 (Attachment D - Exhibit "A"). The maximum vertical height of the facility, including final cover, shall not exceed a final fill elevation of 1,360 feet above mean sea level.

7. Term - This FOC shall terminate upon one of these conditions:

- a) The facility reaching its Limits of Fill as approved by the County of Los Angeles Department of Regional Planning (see Attachment D – Exhibit “A”).
- b) Any significant change in the operation of the facility as defined in Chapter 10.4 of the CSE.
- c) This FOC is subject to reconsideration concurrent with the SWFP revocation or revision or at an earlier date as may be determined by the Task Force.

8. Regulatory Compliance - The facility owner/operator must comply with all law requirements and regulations of the Federal, State, County, and local regulatory agencies.

9. Waste Load-Checking - The facility owner/operator shall implement a Waste Load Checking Program and submit a copy of the approved program to the Task Force at the address indicated at the end of this FOC.

10. Litter Control - Litter control measures shall be implemented by the facility operator/owner in accordance with the approved SUP No. PWR-SAMO-5700-2013-K015 (see Attachment C – Exhibit “B” Condition (2) and Attachment J).

11. Conversion Technologies - The facility owner/operator shall actively work with the Task Force in promoting conversion technologies as alternatives to landfilling and incineration. This shall include, but not be limited to, (a) supporting and promoting legislation and regulations, which would provide economic incentives for the development of conversion technologies, and (b) supporting and promoting legislation and regulations, which would remove conversion technologies from the definition of transformation and give them full diversion credit towards the State waste reduction mandates.

12. Seismic Monitoring - The facility owner/operator shall implement and comply with the following seismic monitoring requirement:

Following a major earthquake/seismic ground motion event: 1) of magnitude 5.0 or greater, as recorded by the closest ground motion monitoring device as maintained by the California Division of Mines and Geology, and 2) with an epicenter located 25 miles from the Landfill (or as directed by the Task Force), thoroughly survey the landfill for primary and secondary surface expressions of seismic activity (such as

surface ruptures, landslides, change in spring flows, liquefaction, etc.). Submit a damage assessment report on the results of the survey to the Task Force, Public Works, and the Local Enforcement Agency for review. The assessment report needs to describe and discuss all features, including damage to the site and infrastructure caused by the earthquake and measures that will be taken to mitigate the impact.

13. Waste Characterizations – On a semi-annual basis, the facility owner/operator shall conduct waste characterizations of the incoming waste stream destined for disposal over a 1-week period during the months of March and September. The results shall be submitted in the attached Monitoring and Reporting Form (see Attachment K) with the reports due April 30 and October 31 of each year to the Task Force.

14. Reports – The facility owner/operator shall submit monthly waste origin surveys on a quarterly basis within 30 days of the end of the quarter to the Task Force.

The information shall be provided in the format approved by the Task Force and/or as may be updated by the Task Force (see Attachment L) or be submitted online via the County of Los Angeles Department of Public Works' Solid Waste Information Management System at www.LACountySWIMS.ORG.

Failure to comply with these reporting requirements shall be considered as a cause for revocation of this FOC.

15. Change in Ownership – In the event of any change in operator or control of ownership of the facility by the CSD, the applicant shall:

- a. Notify the Task Force, in writing, of such change within ten calendar days;
- b. Notify the succeeding owner and operator by letter, a copy of which shall be filed with the Task Force, of the existence of this FOC; and
- c. The new owner and operator shall jointly submit a written report to the Task Force within 30 days of the change of ownership detailing measures that will be implemented to insure compliance with requirements of this FOC.

16. Mitigation Measures – The facility owner/operator shall obtain and fully comply with all the permits and approvals (including, but not limited to, drainage, grading, storm water, building, and industrial waste), as well as comply with all mitigation measures listed in the Site-Specific Mitigation

Measures and Other Requirements (see Attachment C, Exhibit "B"), approved by National Parks Service on November 14, 2013, for compliance with the Siting Criteria.

17. Subsurface Gas Migration – The facility owner/operator shall protect all onsite buildings and enclosed structures within 1,000 feet of the disposal area against intrusion of migrating landfill gas in accordance with the requirements of the County of Los Angeles Building Code. Additionally, the facility owner/operator shall utilize best use management practices to prevent lateral migration of gases to offsite properties to the satisfaction of the Department of Public Works, Department of Public Health, and/or South Coast Air Quality Management District.
18. Closure and Post-Closure Maintenance Plans - The facility owner/operator shall provide a copy of the Closure and Post-Closure Maintenance Plans, including financial assurance demonstrations, as approved by CalRecycle and RWQCB, Los Angeles Region to the Task Force within 60 days of approval of the FOC.

All documents and reports required by this FOC shall be submitted to the following address:

Los Angeles County Integrated Waste Management Task Force
c/o County of Los Angeles Department of Public Works
Environmental Programs Division
P.O. Box 1460
Alhambra, CA 91802-1460

IX. ATTACHMENTS

- A. County Ordinance – Wasteshed Restriction
- B. Solid Waste Facility Permit, April 4, 2016
- C. Special Use Permit No. PWR-SAMO-5700-2013-K015, approved by National Parks Service on November 14, 2013
- D. County Land Use Permits
- E. Hazardous Waste Disposal Limits Map
- F. Waste Discharge Requirements Order No. 82-67
- G. Facility Siting Criteria Evaluation Form, Dated March 7, 2017
- H. Exhibit “A” Site Plan, Dated August 17, 2017
- I. Calabasas Landfill Joint Technical Document, Section 5 – Design and Construction Standards for Perimeter Monitoring Wells and Probes, revised February 2016
- J. Litter Control Protocol
- K. Biannual Solid Waste Monitoring and Reporting Form
- L. Form 13, Monthly Disposal Quantity Reporting Form

FIGURES AND MAPS

- 1. Figure 1-1: Regional Location Map
- 2. Figure 1-2: Ordinance Wasteshed
- 3. Figure 2-1: Site Plan with Facility Boundary
- 4. Figure 2-3: Land Topography Prior to Development of Site
- 5. Figure 2-4: Approved Fill Plan
- 6. Figure 5-1: Fill Areas
- 7. Figure 5-2: Location of Subsurface Barriers System
- 8. Figure 5-3: Existing Drainage System
- 9. Figure 5-4: Final Fill Conceptual Drainage Plan
- 10. Figure 5-6: Existing Landfill Gas Control System
- 11. Figure 5-9: Subsurface Gas Monitoring Grid and Landfill Gas Migration Monitoring Perimeter Probes
- 12. Figure 8: Calabasas Landfill Cross Section Locations and Elevations

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