

## Nancy Hernandez

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**From:** Mike Mohajer <MikeMohajer@yahoo.com>  
**Sent:** Tuesday, January 09, 2018 3:03 PM  
**To:** David Thompson  
**Cc:** Maurice Pantoja; Dorcas Hanson-Lugo; Nicholas Sanchez; Martins Aiyetiwa; Chris Coyle ; Wayde Hunter  
**Subject:** Joint LA City/LA County Sunshine Canyon Landfill (SWIS No. 19-AA-2000)  
**Attachments:** 20171220 - LEA Approval of ADC Evaluation Report.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**DATE:** January 9, 2018

**TO:** David Thompson, REHS  
SCL LEA Program Manager

**FROM:** Mike Mohajer, PE  
A Concerned Private Citizen

**SUBJECT: Sunshine Canyon Landfill (SWIS No. 19-AA-2000)  
Local Enforcement Agency (LEA) Approval of Alternative Daily Cover (ADC)  
Evaluation Report – Second Year, Pilot Project Using Geosynthetic Panel  
Product, dated October 11, 2017**

As a concerned private citizen, I have reviewed your letter of December 12, 2017, to Chris Coyle, General Manager, Sunshine Canyon Landfill / Republic Services (copy attached) and would like to offer the following comments and recommendations to ensure the Sunshine Canyon Landfill's (SCL) neighboring residents' and school children's health and safety which must be the number one priority of the SCL LEA (emphasis added).

1. Pursuant to the requirements of the City and the County of Los Angeles land use permits, I am assuming that you have coordinated your efforts re the subject matter with the Los Angeles County Department of Public Works (emphasis added). Has the County Public Works granted its final approval? The permanent use of the said ADC by the SCL owner/operator may be in violation of the Los Angeles County Conditional Use Permit.
2. In your letter, you have indicated that *"as part of the SCL LEA's normal daily duties at Sunshine Canyon Landfill, the onsite LEA inspector would inspect the ADC in the morning prior to start of operations for compliance with performance standards for controlling blowing litter, vectors, fires, **odor** and scavenging."* In my previous discussions with you and/or members of your team, and contrary to my position, you and members of your team have consistently taken a position that odor monitoring and control falls under the jurisdiction of the South Coast Air Quality Management District (SCAQMD) and that the SCL LEA, is not involved. As such, I was puzzled reading the above statement and would like to be provided

with copies of SCL LEA's daily odor monitoring data and their use in formalizing your subject approval, (emphasis added).

3. On Page 6 of your letter, it has been indicated that *“Odor complaints for the key months in 2017 after the completion of the ADC Cell CC-3B and after the majority of the mitigating measures were implemented, were compared to pre-ADC operations/pre-mitigation measure implementation (emphasis added). The comparison shows a significant decrease of odor complaints. The decrease cannot be totally attributed to the implementation of the ADC or the ICE. It is the result of all of the mitigating measures of which the ADC is one.”* While, I am not trying to disagree with the said statement, I continue to maintain my engineering position, based on over 40 years of experience with landfills and waste management issues, that (a) the pre-2017 existing landfill gas collection and control system was totally under sized. However, it was unfortunate that responsible governmental agencies allowed the SCL owner/operator to operate the landfill without an expanded landfill gas collection and control system for many years, and (b) failure of the landfill owner/operator to provide extraction wells with vacuum pumps to prevent collection of liquid.
4. On page 8 of the letter, it has been indicated that *“In addition, to ensure that the trash is properly covered each night, the ADC is not used during extreme wind events”* (emphasis added). I strongly recommend that the subject letter of approval be revised:
  - To formally define the term “Extreme Wind Events”;
  - To prohibit use of the subject ADC during “extreme wind events” : AND
  - As suggested on Page 8 of the letter, Item (3) during such events, a nine inches of compacted daily soil cover should be used. The statement regarding the “partially peeling back the nine inches of soil cover” needs to be expanded to specifically define the term “partially.” The partially peeling back of daily cover needs to also be approved by the Los Angeles County Public Works.

Should you have any questions, you can reach me at [MikeMohajer@yahoo.com](mailto:MikeMohajer@yahoo.com) or 909-592-1147.

Regards,

**Mike Mohajer, PE**  
P. O. Box 3334  
San Dimas, CA 91773-7334

Attachment (1)

CC: See above  
Each members of the SCAQMD Hearing Board