July 13, 2023

TO: Members of the Facility & Plan Review Subcommittee
Los Angeles County Solid Waste Management Committee/
Integrated Waste Management Task Force

FROM: Michael Harmon, Staff

STAFF REPORT
SCL 2023 STORM WATER DAMAGES AND CORRECTION ACTIONS

On June 29, 2023, a member of the Subcommittee requested Staff to prepare a Staff Report on the Sunshine Canyon Landfill (Landfill) Storm Water Damages & Corrective Actions. This Staff Report provides a summary of Republic Services' (Republic) response to the Notice of Violation (NOV) issued by the Los Angeles Regional Water Quality Control Board (Water Board) dated June 16, 2023, (Enclosure 1) and Los Angeles County Public Works (Public Works) recent actions regarding Drainage and Erosion Control Measures.

Water Board's NOV

On May 17, 2023, the Water Board issued an NOV of Waste Discharge Requirements and the National Pollution Discharge Elimination System Stormwater Permit to the Landfill (Enclosure 2). The NOV required the Landfill to provide a written response reporting all corrective actions that have been taken and actions that are planned to mitigate conditions of the Landfill that are in violation of the Waste Discharge Requirement's (WDR) and the Industrial General Permit (IGP). In response to the NOV, Republic provided a written response to the Water Board dated June 16, 2023. In summary the response included:

- Corrective actions or planned mitigations for the eleven conditions cited in the NOV, with completion or estimated completion dates;
    - The Landfill indicated that areas within the Landfill which require regrading and maintenance to promote positive drainage pattern and prevent ponding will be completed by August 17, 2023.
    - Regarding drainage infrastructure, the Landfill stated "once the sediment has been removed, the repairs to the damaged pipe riser, including additional retrofit measures such as vertical structural support, to prevent reoccurrence, will commence and be finished by August 17, 2003.
    - In regards to Best Management Practices being implemented at the facility the Landfill indicated they are in the process of updating their Storm Water Pollution Prevention Plan and updates will be completed by August 17, 2023.
- A copy of the 2023 Wet Weather Preparedness Report and Winter Operations Plan; and

- The Landfill's Monthly Activity Report dated April 30, 2023, including photos of repair to erosion rills.

Based on Staff's review, most pending items related to the NOV citations are anticipated to be completed by August 17, 2023, in accordance with the NOV's 90-day requirement for Republic to submit a report to demonstrate that the Landfill's corrective actions and planned mitigations are in compliance with the WDRs and IGP.

Drainage and Erosion Control Measures:

Public Works sent a letter to Republic dated April 19, 2023, requesting updates to the Landfill's Monthly Activity Reports to include additional corrective measures at the Landfill to address the impacts sustained from heavy rainstorm events that occurred in the First Quarter of 2023. Republic provided a revised response dated June 30, 2023, that included an updated Erosion and Drainage Control Progress and Action Plan (Enclosure 3). This report is currently under review by PW.

Enclosure 1

SUNSHINE CANYON Landfill

114747 San Fernando Road
Sylmar, CA 91342

June 16, 2023

Dr. Wen Yang
Chief, Land Disposal Unit
Regional Water Quality Control Board
Los Angeles Region
320 West 4th Street, Suite 200
Los Angeles, CA 90013

Re: Sunshine Canyon Landfill, File No. 58-076
Notice of Violation of Waste Discharge Requirements and NPDES Stormwater Permit (Order No. R-4-2008-008, WDID No. 19I001306, Geotracker Global ID. L10006014618) dated May 17, 2023

Dear Dr. Yang:

This letter is in response to the Regional Water Quality Control Board (RWQCB) Notice of Violation (NOV) dated May 17, 2023 related to violations of the Waste Discharge Requirements and NPDES Stormwater Permit observed during inspections on January 31, 2023 by the Los Angeles County Department of Public Works and April 3, 2023 by the RWQCB staff. Each of the eleven conditions cited in the letter are addressed below. In addition, a copy of the 2023 Wet Weather Preparedness Report and Winter Operations Plan has been included in Attachment 1 as well as the Sunshine Canyon Landfill Monthly Activity Report and Additional Corrective Measures dates April 30, 2023 in Attachment 2.

Please do not hesitate to contact me via phone at (818) 200-3016 or by email at pkoster@republicservices.com.

Sincerely,

Paul D. Koster
Environmental Manager

Cc: Michael Wochnick, CalRecycle (Michael.Wochnick@CalRecycle.ca.gov)
Dorcus Hanson-Lugo, Sunshine Canyon Landfill LEA (dlugo@ph.lacounty.gov)
David Thompson, Sunshine Canyon Landfill LEA (david.thompson@lacity.org)
Jessica Brown, City of Los Angeles (jessica.brown@lacity.org)
Larry Israel, SCAQMD (lisrael@aqmd.gov)
Elvira Delgadillo, Los Angeles County Public Works (edelgadillo@dpw.lacounty.gov)
Wayde Hunter, North Valley Coalition, Granada Hills (WHunter01@aol.com)

Geo-Logic ASSOCIATES

Memorandum

To: Paul E. Koster, II, Environmental Manager **Date:** June 16, 2023

From: Courtney Barrett, PE and Fouad Mina, PE, Geo-Logic Associates

Subject: **Sunshine Canyon Landfill**
Notice of Violation of Waste Discharge Requirements and NPDES Stormwater Permit (Order No. R-4-2008-008, WDID No. 19I001306, Geotracker Global ID. L10006014618) dated May 17, 2023

At the request of Browning Ferris Industries of California (BFI of California), GLA has prepared this memorandum in response to the Los Angeles Regional Water Quality Control Board (LARWQCB) Notice of Violation (NOV) dated May 17, 2023 related to violations of the Waste Discharge Requirements and NPDES Stormwater Permit observed during inspections on January 31, 2023 by the Sunshine Canyon Landfill-Local Enforcement Agency (SCL-LEA) and April 3, 2023, by the LARWQCB staff. Each of the eleven conditions cited in the NOV are addressed below. In addition, a copy of the 2023 Wet Weather Preparedness Report and Winter Operations Plan for Sunshine Canyon Landfill (SCL or site), collectively called Winterization Plan, is included herewith in Attachment 1.

The following are the eleven noted violation, each followed by our response.

1. Section E.2 of the WDRs requires that *"Drainage controls, structures, and facilities shall be designed to divert any precipitation or tributary runoff and prevent ponding and percolation of water at the Landfill in compliance with sections 20365 and 21090(b)(1) of 27 CCR. When necessary, temporary structures shall be installed as needed to comply with this requirement."* Ponding of stormwater was observed during both the SCL-LEA and Los Angeles Water Board staff inspection of the Landfill.

Response: The observed ponding was caused by landfill settlement. To address this item, among other site maintenance items, the SCL staff and their consultant engineers have prepared a draft Winterization Plan which is included in Attachment 1. This Winterization Plan includes re-grading the areas where stormwater ponding was observed. Prior to re-grading the low spots, our site mitigation experts will

determine the best plan to reduce the impact to the mitigation area. Once the area is determined to be free of sensitive wildlife, re-grading activities will be accomplished by filling in these localized depressions with either waste to be capped with clean cover soil or just clean cover soil based on the depth of needed fill. The objective of this work is to achieve positive drainage at minimum 3% gradient within these areas. This work will be completed by August 17, 2023.

2. Section E.3 of the WDRs requires that *"The Landfill shall be graded and maintained to promote runoff of precipitation and to prevent ponding of liquids and surface water. Erosion or washout of refuse or cover materials by surface flow shall be controlled to prevent off-site migration."* The current conditions of the Landfill indicate that the Landfill is not graded and maintained to promote runoff of precipitation and to prevent ponding of liquids and surface water.

Response: As indicated in the response to item 1 above, the Winterization Plan included in Attachment 1 shows areas within the landfill which require regrading and maintenance to promote positive drainage pattern and prevent ponding. This grading work will be completed by August 17, 2023.

3. Section E. 4 of the WDRs requires that *"Wastes deposited at the Landfill shall be confined thereto, and shall not be permitted to blow, fall, or otherwise migrate off-site, or to enter off-site water drainage facilities or watercourses."* The migration of wastes to off-site, or evidence of such migration, was observed during both the SCL-LEA and Los Angeles Water Board inspections

Response: The site acknowledges this observation, which is an isolated incident. This incident occurred primarily from two sources, a damaged standpipe in terminal basin (refer to items 5 and 7 below for repair measures), and debris from landfill traffic along the site entrance road. Typically, street sweeper service is utilized frequently when needed along the roadway after hours; however, due to weather condition when this incident occurred, this service was not provided because of unsafe working conditions. Moreover, site staff was unable to address this incident at the time of occurrence also due to extreme inclement weather conditions which also caused unsafe working conditions for SCL operations and maintenance personnel. However, this item was addressed once weather condition allowed following the inspections. To minimize potential for

reoccurrence under similar circumstances in the future, SCL staff is actively working with the different stakeholders at the site to identify areas and operation practices that could potentially be sources of waste migration off site. Once these potential point and activity sources are identified, additional measures such as hydroseeding, placement of straw waddles, litter fence, or jute matting on exposed slopes will be installed by August 17, 2023. In addition, once the standpipe is repaired and reinforced (refer to items 5 and 7 below), this will be no longer a potential source of waste migration off-site via the basin.

4. Section E. 17 of the WDRs require that *"The Discharger shall report any noncompliance or any incident resulting from operations at the Landfill that are in violation of this Order. Any such information shall be provided verbally to the designated Regional Board staff contact within 24 hours from the time the Discharger becomes aware of the circumstances. A written submission shall be provided to the Regional Board within seven days of the time that the Discharger becomes aware of the circumstances."* The Discharger did not report the considerable damage to the stormwater drainage system at the Landfill, including the collapsed riser drain structure at the terminal sediment basin, to the Los Angeles Water Board in accordance with this requirement

Response: SCL acknowledges this inadvertent break in prompt communication. Moving forward, site management staff will ensure that LARWQCB staff receive the required proper and timely notifications.

5. Section K. 1.a. of the WDRs requires that *"Waste management units shall be designed, constructed, and maintained to prevent, to the greatest extent possible, ponding, infiltration, inundation, erosion, slope failure, and washout which could occur as a result of precipitation from a 100-year, 24-hour frequency storm."* The collapsed riser drain structure at the Landfill in January 2023, and its continuous disrepair thereafter, indicate that the drainage system at the Landfill does not meet this requirement

Response: Site drainage infrastructure has been designed and constructed to meet the Los Angeles County Department of Public Works requirements for drainage infrastructure to handle a 50-year, 24-hour Bulked and Burned frequency storm. The calculated flows for this frequency are, at a minimum, 15% greater than the calculated flows for the 100-year, 24-hour frequency storm. However, during one of the storm events in early January, one of three riser pipes was damaged by

floating debris causing its collapse. The multiple successive heavy rain events prohibited its immediate repair due to limited access and unsafe working conditions. SCL considers this to be an anomaly, however, past events have proven the basin, including de-silting mechanisms installed in 2017, meet the regulatory requirements as proven by the stormwater sampling results that have been uploaded to SMARTS as part of compliance with the Industrial General Permit (IGP). Commencing in early June, we have actively started removal of sediment within the basin. Once the sediment has been removed, the repairs to the damaged pipe riser, including additional retrofit measures such as vertical structural support, to prevent reoccurrence, will commence and be finished by August 17, 2003.

6. Section K.4. of the WDRs requires that *"All drainage structures shall be protected and maintained continuously to ensure their effectiveness,"* The observations documented in the SCL-LEA and Los Angeles Water Board staff inspection reports indicate that the Discharger is not compliance with this requirement

Response: The SCL-LEA inspection was conducted in the middle of multiple successive heavy rain events. These events prohibited the operations team's routine maintenance from taking place due to limited access to impacted areas and unsafe working conditions. This routine maintenance includes clearing surface drainage structures along with other similar systems within the site.

Site personnel performed monthly inspections as required by the NPDES permit and SWPPP to ensure that the various systems were in proper working order. During these inspections, site personnel also observed and noted any maintenance activities needed to be undertaken. These maintenance activities are performed as soon as it is safe and feasible to do so.

7. Section III.C of the IGP prohibits *"Industrial stormwater discharges and authorized NSWDs that contain pollutants that cause or threaten to cause pollution, contamination, or nuisance as defined in section 13050 of the Water Code"*. A broken riser in the terminal basin led to the discharge of sediment laden stormwater from the Landfill into Bull Creek, which flows into the Los Angeles River

Response: The site acknowledges the damage to one of the 3 discharge pipe risers in the terminal basin during the successive heavy rain events. When this occurred, the

basin was not safely accessible to site personnel or equipment for implementing the necessary repairs. Currently, conditions are allowing, the site maintenance crew to begin cleaning the basin and replace the broken pipe riser including additional retrofit measures to prevent reoccurrence. The retrofit design is currently being prepared by a licensed engineer and a copy of this workplan will be provided to the Water Board when it becomes available. The repairs and retrofit work will be completed by August 17, 2023.

8. Section X.H.1.b.ii of the IGP requires dischargers to *"observe the identified equipment and systems to detect leaks, or identify conditions that may result in the development of leaks."* The preventative maintenance section in the SWPPP does not include procedures for inspecting the structural integrity of the risers

Response: As part of the annual Winterization Plan implementation, a licensed engineer will inspect the integrity of the basin discharge standpipes annually by October 1. Sections 4.2 and 5.1 of the SWPPP will be updated by August 17, 2023 to include the additional inspection and maintenance procedures. A copy of the updated SWPPP will be uploaded into SMARTS and will also be made available on request.

9. Section X.H.4.a.v of the IGP requires dischargers to *"ensure the SWPPP identifies each BMP being implemented at the facility, including the procedures, including maintenance procedures, and/or instructions to implement the BMP effectively."* The SWPPP does not include the design size, the load capacity, or the maintenance procedures for the risers

Response: SCL is in the process of updating Sections 4.2 and 5.1 of the SWPPP to include this information. The updates will be completed by August 17, 2023 and a copy will be made available at that time.

10. Section X.H.1.e.ii of the IGP requires dischargers to *"provide effective stabilization for inactive areas, finished slopes and other erodible areas prior to a forecasted storm event."* Erosion rills were observed on the sloped areas bordering the landfill, and sediment was observed in the basins and culverts

Response: The erosion rills have been documented in the Winterization Plan in Attachment 1. Repairs, which include backfilling erosion rills with compacted clean soil and track-walking finished slopes, have already started on the erosion within the surrounding slopes. A copy of a letter to the Los Angeles County Department of

Public Works documenting the progress of these repairs has been provided in Attachment 2. All repairs are scheduled to be completed by August 17, 2023.

11. Section XI, Table 2 in the IGP lists the Numerical Action Level (NAL) for total suspended solids. The instantaneous maximum NAL for total suspended solids is 400 mg/L. The total suspended solids concentration reported to the Los Angeles Water Board on April 11, 2023, was 1,600 mg/L. You are required to implement best management practices to prevent future exceedances of the NAL for total suspended solids.

Response: Prior to damage of the pipe riser, stormwater sampling results, during past storm events, showed the site in compliance with the NAL for total suspended solids. The repairs and retrofit to the pipe riser, along with implementation of the Winterization Plan, will be completed in accordance with Best Available Technologies (BATs) and Best Management Practices (BMPs). Sampling Results are available on SMARTs and can also be made available upon request.

List of Attachments:

Attachment 1: "2023 Wet Weather Preparedness Report and Winter Operations Plan" dated June 9, 2023, prepared by SWT Civil and Environmental Engineering

Attachment 2: "Sunshine Canyon Landfill Monthly Activity Reports and Additional Corrective Measures" dated April 30, 2023, prepared by Sunshine Canyon Landfill

Attachment 1

2023 Wet Weather Preparedness and Winterization Plan

Geo-Logic ASSOCIATES

MEMORANDUM

TO: Paul Koster
Environmental Manager
Sunshine Canyon Landfill

DATE: June 9, 2023

FROM: Jeremy Botica
SWT Engineering

RE: 2023 WET WEATHER PREPAREDNESS REPORT AND WINTER OPERATIONS PLAN - SUNSHINE CANYON CITY/COUNTY LANDFILL

Mr. Paul Koster

This memo is prepared for the Sunshine Canyon Landfill (SCL) in support of the site's goal to help ensure the success of the site to for the upcoming wet weather season, and the inspection letters received from the Los Angeles Regional Water Quality Control Board (LARWQCB) and the Local Enforcement Agency (LEA). The 2022 storm events were significant in size and some erosion/drainage issues did arise from the events. In order to prepare for the next winter season SCL has prepared a plan to improve the site conditions and are included on the Plan sheet provided by SWT Engineering, Dated May 2023.

These improvements included sediment management, erosion control features and drainage improvements for the site, both within the refuse footprint and around the perimeter of the site, which include:

- Track-walking slopes throughout the site to reduce slope erosion and allow establishment of seeded or native vegetation in non-active areas;
- Sedimentation Basin clean out and riser inspection for Basins A, B, and D, improvements or repairs as needed;
- Cleaned the skimmer systems in the Terminal Basin to make sure they are functioning properly (repairs per GLA improvement plans);
- Fiber Roll installation for erosion control on slopes and around material stockpiles;
- Grading active landfill decks to prevent erosion by avoiding overly steepened swales and decks;
- Installing operational wet weather deck with recycled asphalt concrete;
- Installing rumble strips at the exit to help prevent drag out;
- Installing drainage piping for collection and diverting towards the perimeter channels;
- Removal of silt, gravel check dams, and vegetation from the perimeter channels;
- Cleaning of existing pipes and inlets of vegetation and litter;

- Construction of Diversion Berms and swales where required to create flows towards drainage inlets/perimeter channels; and
- Applying a soil stabilizer containing polymers formulated specifically for stabilization of slopes on appropriate slope areas, where applicable.

If you have any questions or require any additional information about this memo for the planned improvements, please feel free to contact the Project Manager Jeremy Botica at 909-390-1328 or via email at jab@swteng.com.

Enclosures:

Drawing 3: Planned Northern Winterization Plan 1

Drawing 4: Planned Southern Winterization Plan 2

Jeremy A. Botica, P.E. 81230, M.S.,
Project Manager
SWT Engineering
jab@swteng.com
805-479-3844

Attachment 2

Monthly Activity Reports and Additional Corrective Measures

Geo-Logic ASSOCIATES

SUNSHINE CANYON Landfill
14747 San Fernando Road
Sylmar, CA 91342

April 30, 2023

Mr. Mark Pestrella
Director of Public Works
Los Angeles County of Public Works

Mr. Dave Nguyen
Senior Civil Engineer
Los Angeles County Public Works

Subject: Sunshine Canyon City/County Landfill Conditional Use Permit NO. 00-194-(5) Monthly Activity Reports and Additional Corrective Measures

Dear and Mark Pestrella and Mr. Dave Nguyen:

Sunshine Canyon Landfill (SCL) received Los Angeles County Department of Public Works' letter dated April 19, 2023 regarding the recent Monthly Activity Reports and LEA's Disposal Facility Inspection Reports prepared by the Sunshine Canyon Landfill-Local Enforcement Agency (SCL-LEA). The letter requested SCL prepare a detailed report providing the current status and milestones identifying how the landfill is addressing the following items:

a. Erosion throughout site
b. Discharge of trash, water, and mud leaving the Landfill property onto San Fernando Road
c. The compromised riser and reduced capacity of the terminal basin
d. Litter carried off site

The challenges faced in the first quarter of 2023 are a result of a prolonged rain event that began in October 2022 and subsided in the end of March 2023. During this wet season SCL received over 55 inches of rain, an exceptionally high amount for the site which typically sees an average of 15 inches. This excessive rain made it unsafe or impractical to address the above-mentioned problem areas due difficulty working heavy equipment in wet material. Since the heavy rain has stopped the team has been working diligently on addressing these areas and remains dedicated to restoring the site to the pre-storm conditions.

The following is an outline of the corrective status of the repairs.

1. Erosion Rills throughout site

Item Number	Area	Issue	Corrective Action	Status	Completion Date
1	Switchback	Erosion Rills + Trash Accumulation	Cover, Track Walk, Grade	Complete	3/28/2023
2	Soil Plug	Erosion Rills + Trash Accumulation	Cover, Track Walk, Grade	Complete	3/28/2023
3	Buttress	Erosion	Fill, Track Walk, Grade	Complete	3/29/2023
4	CC-3B	Erosion Rills + Exposed EnviroCover	Cover, Track Walk, Grade	Complete	4/10/2023
5	CC-4 P4A/B/C	Erosion Rills + Exposed EnviroCover	Cover, Track Walk, Grade	Complete	4/17/2023
6	Pencil Tip	Erosion Rills+ Exposed EnviroCover	Cover, Track Walk, Grade	Complete	4/24/2023
7	CC-3A	Erosion Rills	Cover, Track Walk, Grade	Complete	4/25/2023
8	CC4-P4A	Erosion and exposed piping	Cover	Complete	4/29/2023
9	Site-wide	Small erosion rills	Cover, Track Walk, Grade	On-going	10/1/2023*

* The SCL Team assesses conditions and weather forecasts weekly to determine if is safe/practical to start repairs; however, repairs will be complete by October 1.

2. Discharge of trash, water, and mud leaving the Landfill property boundary onto San Fernando Road.

All of the above-referenced discharge has been cleaned up/removed. The site has reinforced additional wet weather BMPs to reduce the potential for discharge off-site. These include, but are not limited to: additional litter picking efforts in channels, removal of sediment build-up in channels and basins, additional grading work throughout landfill to promote positive drainage,

coverage of erosion rills and exposed trash, placement of visqueen material to eliminate potential for future erosions, and enhanced street sweeping on main haul roads.

In addition, SCL employs workers devoted to cleaning litter on and off site and will increase the number of workers on an as-need basis. Additionally, SCL utilizes litter screens around the site designed to capture any debris before it leaves the site. Daily litter surveys are conducted by Operations throughout the neighborhoods surrounding SCL and any litter observed is immediately remedied.

3. The compromised riser and reduced capacity of the terminal basin

In January 2023, SCL received 8.23 inches of rain within a 24-hour period. This amount of water and the material it carried resulted in one of the three standpipes in the terminal basin to rupture. This excessive rain seen in January and throughout the beginning of 2023 has made it unsafe or impractical to address the standpipe due to difficulty working heavy equipment in wet material. Since the heavy rain has slowed, the team intends to schedule the work for the standpipe in late June or early July, dependent on weather conditions. Once the material has dried and the conditions are safe for personnel and equipment to operate, SCL will begin remediation. This will involve removing the old standpipe, installing and grouting the new standpipe into place, and cutting a hole for drainage.

As demonstrated above and in the attached photographs in Attachment 1, the areas noted in the inspection report have since been corrected, with the exception of the last item which will continue to be an on-going effort as this rainy season continues. All exposed trash as a result of erosion has been covered and rectified. Small (surface) erosion rills are monitored and corrected before trash becomes exposed, and all will be covered completely prior to October 1st. The team will continue to evaluate and inspect the facility on daily basis and perform corrective actions in a timely matter. The heavy rains experienced this year have also brought the site team the benefit of understanding the potentially 'at-risk' areas of the facility, which will be more thoroughly evaluated and addressed as part of the upcoming Wet Weather Preparedness Plan.

Should you have any questions, please don't hesitate to contact me.

Sincerely,

Kate Downey

SUNSHINE CANYON
Landfill

14747 San Fernando Road
Sylmar, CA 91342

Team Environmental Manager
Sunshine Canyon Landfill
(818) 698-9418

Attachment 1 Before and After Photos

SUNSHINE CANYON
Landfill
14747 San Fernando Road
Sylmar, CA 91342

Area Switchback 1 Before

Area 1 Switchback After

SUNSHINE CANYON
Landfill
14747 San Fernando Road
Sylmar, CA 91342

Area 2 Soil Plug Before

Area 2 Soil Plug After

SUNSHINE CANYON
Landfill
14747 San Fernando Road
Sylmar, CA 91342

Area 3 Buttress Before

Area 3 Buttress After

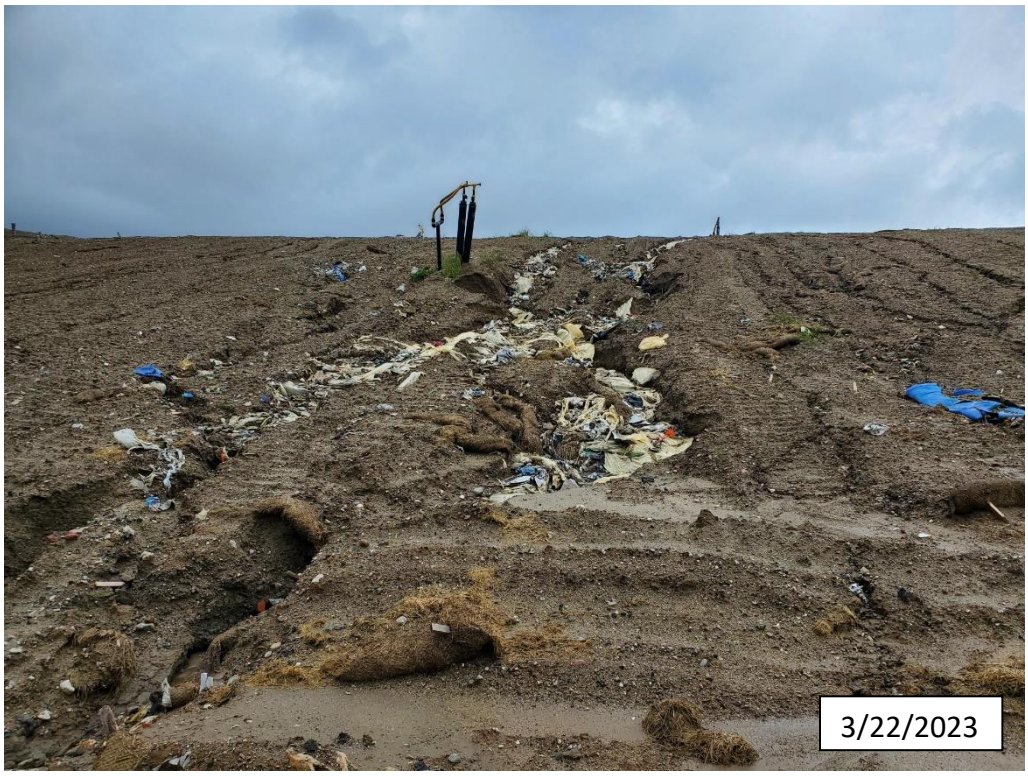
SUNSHINE CANYON
Landfill
14747 San Fernando Road
Sylmar, CA 91342

Area 4 CC-3B Before

Area 4 CC-3B After

SUNSHINE CANYON
Landfill
14747 San Fernando Road
Sylmar, CA 91342

Area 4 CC-3B Before



Area 4 CC-3B After

SUNSHINE CANYON
Landfill
14747 San Fernando Road
Sylmar, CA 91342

Area 5 CC-4 Before

Area 5 CC-4 After

SUNSHINE CANYON
Landfill

14747 San Fernando Road
Sylmar, CA 91342

Area 5 CC-4 Before

Area 5 CC-4 After

SUNSHINE CANYON
Landfill
14747 San Fernando Road
Sylmar, CA 91342

Area 6 Pencil Tip Before

Area 6 Pencil Tip After

SUNSHINE CANYON
Landfill

14747 San Fernando Road
Sylmar, CA 91342

Area 7 CC-3A Before

Area 7 CC-3A After

SUNSHINE CANYON
Landfill
14747 San Fernando Road
Sylmar, CA 91342

Trash, water, and mud on San Fernando Road Before 1

Trash, water, and mud on San Fernando After 1

SUNSHINE CANYON Landfill
14747 San Fernando Road
Sylmar, CA 91342

Trash, water, and mud on San Fernando Road Before 2

Trash, water, and mud on San Fernando Road After 2

Attachment 2: Site Map

SUNSHINE CANYON
Landfill

14747 San Fernando Road
Sylmar, CA 91342

Enclosure 2

May 17, 2023

Kate Downey, Environmental Manager
Sunshine Canyon City/County Landfill
14747 San Fernando Road
Sylmar, CA 91342
kdowney@republicservices.com

Certified Mail
Return Receipt Requested
Claim No. 7022 3330 0000 0513 9262

NOTICE OF VIOLATION OF WASTE DISCHARGE REQUIREMENTS AND NPDES STORMWATER PERMIT - SUNSHINE CANYON CITY/COUNTY LANDFILL, SYLMAR, CALIFORNIA (ORDER NO. R4-2008-0088, WDID NO. 19I001306, GEOTRACKER GLOBAL ID L10006014618)

Dear Kate Downey:

The California Regional Water Quality Control Board, Los Angeles Region (Los Angeles Water Board), is the public agency with primary responsibility for the protection of ground and surface water quality within major portions of Los Angeles and Ventura Counties. The Los Angeles Water Board hereby issues this notice of violation (NOV) to Republic Services (Discharger), which owns and operates the Sunshine Canyon City/County Landfill (Landfill), a Class III municipal solid waste landfill that is located at 14747 San Fernando Road, Sylmar, California.

The Landfill is regulated under waste discharge requirements (WDRs) Order No. R4-2008-0088, adopted by the Los Angeles Water Board on October 2, 2008, for the discharge of municipal solid wastes. The WDRs includes requirements for the construction, operations, and closure and post closure maintenance of the Landfill to protect ground and surface water resources of the State. In addition, the Landfill is also regulated under the State Water Resources Control Board National Pollutant Discharge Elimination System (NPDES) General Permit for stormwater discharges associated with industrial activities (IGP, WDID No. 19I001306, enrolled since March 27, 1992).

On March 21, 2023, the Los Angeles County Department of Public Works informed the Los Angeles Water Board that, based on a January 31, 2023, inspection by the Sunshine Canyon Landfill-Local Enforcement Agency (SCL-LEA), the Landfill experienced several problems with the drainage system due to high volume flow of stormwater and construction activity at the Landfill. Many of the landfill's drainage ditches along the haul

road became overwhelmed with sediment and rocks. This redirected runoff onto the haul road and caused trash, water, and mud to be discharged out the front gate of the Landfill. One of the three vertical riser drain structures in the terminal sediment basin of the Landfill collapsed, causing trash to pass through the down pipe and flow offsite onto Bull Creek, which is part of the Los Angeles County storm sewer system that drains to the Los Angeles River, a water of the State. The inspection report also indicates that two large ponds formed on top of the closed City Landfill South area of the Landfill. The SCL-LEA inspection report is included herein as Attachment 1.

On April 3, 2023, the Los Angeles Water Board staff inspected the Landfill and observed that the collapsed riser drain structure at the terminal sediment basin was still in disrepair. Because of this damage, the sediment basin's retention capacity was significantly reduced and there was evidence indicating that a significant amount of sediments had been washed into the storm sewer during the storm events since January 2023. During the inspection, staff also observed ponding of stormwater on top of the Landfill. Observations of the Los Angeles Water Board staff inspection on April 3, 2023, are documented in the Los Angeles Water Board inspection report that is included herein as Attachment 2.

You are hereby informed that, based on the observations documented in the SCL-LEA January 31, 2023, inspection report, the Los Angeles Water Board staff April 3, 2023, inspection report, and a review of the Storm Water Pollution Prevention Plan (SWPPP) that the Discharger submitted to the Los Angeles Water Board on December 22, 2021, pursuant to the IGP, the Discharger is in violation of the following requirements and provision of the WDRs and the IGP:

1. Section E.2 of the WDRs requires that "*Drainage controls, structures, and facilities shall be designed to divert any precipitation or tributary runoff and prevent ponding and percolation of water at the Landfill in compliance with sections 20365 and 21090(b)(1) of 27 CCR. When necessary, temporary structures shall be installed as needed to comply with this requirement.*" Ponding of stormwater was observed during both the SCL-LEA and Los Angeles Water Board staff inspection of the Landfill;

2. Section E.3 of the WDRs requires that "*The Landfill shall be graded and maintained to promote runoff of precipitation and to prevent ponding of liquids and surface water. Erosion or washout of refuse or cover materials by surface flow shall be controlled to prevent off-site migration."* The current conditions of the Landfill indicate that the Landfill is not graded and maintained to promote runoff of precipitation and to prevent ponding of liquids and surface water*;*

3. Section E. 4 of the WDRs requires that "*Wastes deposited at the Landfill shall be confined thereto, and shall not be permitted to blow, fall, or otherwise migrate off-site, or to enter off-site water drainage facilities or watercourses.*" The migration of

wastes to off-site, or evidence of such migration, was observed during both the SCL-LEA and Los Angeles Water Board inspections;

4. Section E. 17 of the WDRs require that "*The Discharger shall report any noncompliance or any incident resulting from operations at the Landfill that are in violation of this Order. Any such information shall be provided verbally to the designated Regional Board staff contact within 24 hours from the time the Discharger becomes aware of the circumstances. A written submission shall be provided to the Regional Board within seven days of the time that the Discharger becomes aware of the circumstances."* The Discharger did not report the considerable damage to the stormwater drainage system at the Landfill, including the collapsed riser drain structure at the terminal sediment basin, to the Los Angeles Water Board in accordance with this requirement;

5. Section K. 1.a. of the WDRs requires that "*Waste management units shall be designed, constructed, and maintained to prevent, to the greatest extent possible, ponding, infiltration, inundation, erosion, slope failure, and washout which could occur as a result of precipitation from a 100-year, 24-hour frequency storm."* The collapsed riser drain structure at the Landfill in January 2023, and its continuous disrepair thereafter, indicate that the drainage system at the Landfill does not meet this requirement;

6. Section K.4. of the WDRs requires that "*All drainage structures shall be protected and maintained continuously to ensure their effectiveness,"* The observations documented in the SCL-LEA and Los Angeles Water Board staff inspection reports indicate that the Discharger is not compliance with this requirement;

7. Section III.C of the IGP prohibits *"Industrial stormwater discharges and authorized NSWDs that contain pollutants that cause or threaten to cause pollution, contamination, or nuisance as defined in section 13050 of the Water Code". A* broken riser in the terminal basin led to the discharge of sediment laden stormwater from the Landfill into Bull Creek, which flows into the Los Angeles River*;*

8. Section X.H.1.b.ii of the IGP requires dischargers to "*observe the identified equipment and systems to detect leaks, or identify conditions that may result in the development of leaks."* The preventative maintenance section in the SWPPP does not include procedures for inspecting the structural integrity of the risers;

9. Section X.H.4.a.v of the IGP requires dischargers to "*ensure the SWPPP identifies each BMP being implemented at the facility, including the procedures, including maintenance procedures, and/or instructions to implement the BMP effectively."*

The SWPPP does not include the design size, the load capacity, or the maintenance procedures for the risers;

10. Section X.H.1.e.ii of the IGP requires dischargers to "*provide effective stabilization for inactive areas, finished slopes and other erodible areas prior to a forecasted storm event."* Erosion rills were observed on the sloped areas bordering the landfill, and sediment was observed in the basins and culverts; and

11. Section XI, Table 2 in the IGP lists the Numerical Action Level (NAL) for total suspended solids. The instantaneous maximum NAL for total suspended solids is 400 mg/L. The total suspended solids concentration reported to the Los Angeles Water Board on April 11, 2023, was 1,600 mg/L. You are required to implement best management practices to prevent future exceedances of the NAL for total suspended solids.

You are directed to immediately correct the above cited violations of the WDRs and the IGP. Within 30 days from the date of this NOV, the Discharger shall submit a written response to the Los Angeles Water Board to report all corrective actions that have been taken and actions that are planned to mitigate conditions of the Landfill that are in violation of the WDRs and IGP. No later than 90 days from the date of this NOV, the Discharger shall submit a report to the Los Angeles Water Board to demonstrate that the Landfill's drainage system, including all drainage channels, sediment retention basins, and interim and final covers are in compliance with the WDRs and the IGP.

The violations of WDRs subject you to enforcement actions, including administrative civil liability. Pursuant to the California Water Code section §13350(e), you are subject to penalties of up to five thousand dollars ($5,000) for each day in which the violations occur. These administrative civil liabilities may be assessed by the Los Angeles Water Board beginning with the date that the violations first occurred and without further warning. This matter may also be referred to the office of the Attorney General for further enforcement. The Los Angeles Water Board reserves the right to take any further enforcement action authorized by law.

The violations of the IGP subject you to enforcement actions, including administrative civil liability. Pursuant to California Water Code section 13385, subdivision (c)(1), the Permittee is subject to discretionary administrative civil liability of up to ten thousand dollars ($10,000) for each day in which the violation(s) occurs. The discretionary administrative civil liability may be assessed by the Los Angeles Water Board beginning with the date that the violation(s) first occurred. The Los Angeles Water Board may also refer this matter to the Attorney General's Office for further enforcement. Please note that this Notice shall not be deemed to relieve you of liability for any penalties that may have already accrued. The Los Angeles Board reserves its right to take any further enforcement action authorized by law.

If you have any questions, please contact Wen Yang, Supervisor of the Los Angeles Water Board Land Disposal Unit, at Wen.Yang@waterboards.ca.gov or (213) 620-2253, or Pavlova Vitale, Supervisor of the Los Angeles Water Board Land Enforcement Unit II, at Pavlova.Vitale@waterboards.ca.gov or (213)576-6751.

Sincerely,

Hugh Marley
Assistant Executive Officer

Enclosures:

SCL-LEA Inspection Report, January 31, 2023
Los Angeles Water Board Inspection Report, April 3, 2023

Cc:

Michael Wochnick, CalRecycle (Michael.Wochnick@CalRecycle.ca.gov)
Dorcus Hanson-Lugo, Sunshine Canyon Landfill LEA (dlugo@ph.lacounty.gov)
David Thompson, Sunshine Canyon Landfill LEA (david.thompson@lacity.org)
Jessica Brown, City of Los Angeles (jessica.brown@lacity.org)
Larry Israel, SCAQMD (lisrael@aqmd.gov)
Elvira Delgadillo, Los Angeles County Public Works (edelgadillo@dpw.lacounty.gov)
Wayde Hunter, North Valley Coalition, Granada Hills (WHunter01@aol.com)

Enclosure 3

SUNSHINE CANYON Landfill

14747 San Fernando Road
Sylmar, CA 91342

June 30, 2023

Mr. Mark Pestrella
Director of Public Works
Los Angeles County of Public Works

Mr. Dave Nguyen
Senior Civil Engineer
Los Angeles County Public Works

Subject: Sunshine Canyon City/County Landfill Conditional Use Permit NO.00-194-(5) Monthly Activity Reports and Additional Corrective Measures

Dear Mr. Mark Pestrella and Mr. Dave Nguyen:

Sunshine Canyon Landfill (SCL) received the letter from the Los Angeles County Department of Public Works dated June 1, 2023 (LA County June 1, 2023 Letter), regarding the SCL's Monthly Activity Reports and Additional Corrective Measures (Report) dated April 30, 2023. In this letter, Public Works requested additional details on the milestones, schedule for maintenance/repairs, or implementation of long-term or preventative measures to ensure the landfill is safeguarded and ready for future similar rainstorm events; subsequently, a request was made to include relevant information due to the issuance of Notices of Violation from the Sunshine Canyon Landfill Local Enforcement Agency, and Los Angeles Regional Water Quality Control Board and their respective action plans/responses with regard to drainage-specific corrective measures. The following is the revised Report providing additional details on the current status and milestones for how the landfill is addressing the following items:

a. Erosion and ponding throughout the site
b. Discharge of trash, waste, and mud leaving the Landfill property onto San Fernando Road, and litter carried off-site
c. The compromised riser and reduced capacity of the terminal basin
d. Slope failure and sediment build-up

Please note, this Report covers activities conducted between March 1, 2023 through June 23, 2023.

The challenges faced in the first quarter of 2023 are a result of a prolonged rain event that began in October 2022 and subsided in the end of March 2023. During this wet season, SCL received over 55 inches of rain, an exceptionally high amount for the site which typically sees an average of 15 inches. This excessive rain made it unsafe or impractical to address the above-mentioned problem areas due to difficulty working heavy equipment in wet material. Since the heavy rain has stopped, the team has been working diligently on addressing these areas and remains dedicated to restoring the site to the pre-storm conditions.

The following is an outline of the corrective status of the repairs.

a. "Erosion rills and ponding throughout the site"

Item Number	Area	Issue	Corrective Action	Status	Completion Date
1	Switchback	Erosion Rills + Trash Accumulation	Cover, Track Walk, Grade	Complete	3/28/2023

2	Soil Plug	Erosion Rills + Trash Accumulation	Cover, Track Walk, Grade	Complete	3/28/2023
3	Buttress	Erosion	Fill, Track Walk, Grade	Complete	3/29/2023
4	CC-3B	Erosion Rills + Exposed EnviroCover	Cover, Track Walk, Grade	Complete	4/10/2023
5	CC-4 P4A/B/C	Erosion Rills + Exposed EnviroCover	Cover, Track Walk, Grade	Complete	4/17/2023
6	Pencil Tip	Erosion Rills + Exposed EnviroCover	Cover, Track Walk, Grade	Complete	4/24/2023
7	CC-3A	Erosion Rills	Cover, Track Walk, Grade	Complete	4/25/2023
8	CC4-P4A	Erosion and Exposed Piping	Cover	Complete	4/29/2023
9	Site-wide	Small Erosion Rills	Cover, Track Walk, Grade	On-going	10/1/2023
10	Site-Wide	Ponding	Drain. Track Walk, Regrading	Complete	5/1/23

*Small, superficial erosion rills which do not pose an issue for odors are addressed on an on-going basis, and will be fully covered prior to October 1, 2023 to prevent any exacerbation.

The SCL Local Enforcement Agency (LEA) also shared concern regarding the erosion and drainage and the Disposal Facility Inspection Report for March 2023 requested an Action Plan be submitted to address the erosion and drainage issues. The Action Plan was submitted on April 30, 2023 and included the repairs and corrective actions listed in the above table. A copy of that Action Plan is included in Attachment 2 of this Report. Upon their review, the LEA made the following observations as described in their Disposal Facility Inspection Report for April 2023.

> *"The operator has accelerated the repair work by allocating extra resources to the project and by having one of their contractors work overtime. As of the end of April 2023, all of the areas of exposed waste have been covered with dirt and the major erosional ruts have been repaired. The drainage channels that had substantial sedimentation have been cleared and precipitation can flow freely off of the landfill."*

The Disposal Facility Inspection Report for April 2023 indicates that the previous violation issued for drainage and erosion control had been corrected to the satisfaction of the LEA. A copy of this Inspection Report is included in Attachment 3. This further reinforces that SCL's efforts to assess the current conditions, correct and implement the appropriate immediate repairs, and prioritize these efforts to complete in a timely manner have been successful.

On May 17, 2023, the Los Angeles Regional Water Quality Control Board (LARWQCB) issued a Notice of Violation, which included 11 conditions cited (a copy of the NOV is included in

Attachment 4) related to impacts from the wet weather season. The NOV requested an action plan demonstrating how the facility will come into compliance with the 11 conditions, within 30 days of the NOV. SCL submitted a Response Memorandum to the LARWQB on June 16, 2023. A copy of this Response Memorandum is included in Attachment 7.

Three of the cited conditions in the NOV included similar concern to both DPW, and LEA including lack of proper grading to promote runoff of precipitation and prevent ponding of liquids and surface water. As indicated in the Response Memorandum, the SCL team in consultation with their engineers prepared a draft Winterization Plan, which includes re-grading areas where stormwater ponding was observed. While most of the grading activities have already been complete (those areas identified in the report table above), any remaining areas identified through the site inspections in preparation of the Draft Winterization Plan will be completed by August 17. A copy of this Draft Winterization Plan is included as an attachment to the Response Memorandum, in Attachment 7 of this Report. In addition to the recommended actions in the Winterization Plan, Sunshine Canyon will also work to include the following preventative measures:

- Weekly visual inspections of the site to track and evaluate the small erosional rills on the slopes of the landfill. When areas are identified as needed repairs and/or corrections, they are typically repaired and/or corrected within one to two weeks from initial inspection. All repairs and/or corrections to the small erosional rills will be completed by October 1, 2023 as part of the landfill's yearly winterization activities.

- Jute mat and straw wattles may be used to provide erosion protection on the freshly repaired slopes. Additional erosion and moisture intrusion protection may be provided on sensitive areas by placing overlapping panels of surplus, lighter-weight HDPE over the slope to act as a moisture barrier. SCL will obtain these materials and have them readily available at the site to be used as needed by October 1, 2023 as part of the landfill's yearly winterization.

- SCL has solicited proposals from its list of qualified consultants to collect soil samples along particular exposed slopes within the landfill footprint to determine the optimal vegetation to require little to no water. SCL has requested that soil sample collection efforts occur and are completed by the end of July 2023. Once soil sample results are received, they will be sent to a seed specialist to determine the most viable seed mix. The identified slopes are planned to be hydroseeded with this seed mix by November 30, 2023.

- SCL has solicited proposals from qualified biologists to retain a biologist to conduct a site walk of the areas surrounding the depressions. SCL and a representative from Architerra walked Deck A on June 20th to determine the area to fill to prevent further ponding. Construction prep work will start on approximately July 3rd and final grading for proper drainage will be complete by August 17th.

b. "Discharge of trash, waste, and mud leaving the Landfill property boundary onto San Fernando Road" and "Litter carried off-site"

All of the above-referenced discharge has been cleaned up/removed. The site has reinforced additional wet-weather BMPs to reduce the potential for discharge off-site. These include but are not limited to: additional litter picking efforts in channels, removal of sediment build-up in channels and basins, additional grading work throughout landfill to promote positive drainage, coverage of erosion rills and exposed trash, placement of visqueen material to eliminate potential for future erosions, and enhanced street sweeping on main haul roads.

In addition, SCL employs workers devoted to cleaning litter on and off site and will increase the number of workers on an as-needed basis. SCL also utilizes litter screens around the site designed to capture any debris before it leaves the site. Daily litter surveys are conducted by Operations throughout the neighborhoods surrounding SCL and any litter observed is immediately remedied.

In May 2023, SCL updated the facility's Litter Control and Recovery Plan which includes both on-site and off-site procedures to control litter and debris. The updated plan includes enhanced protocols to ensure additional protections are afforded to local water bodies, and specifically during rain events. A copy of the updated Litter Control and Recovery Plan is included in Attachment 5.

Within the above-mentioned LARWQCB NOV, two of the cited conditions also referred to the migration of wastes off-site. As described in the Response Memorandum, the site acknowledges this observation, which is determined to have been an isolated incident. This incident occurred primarily from two sources, a damaged standpipe in terminal basin, and debris from landfill traffic along the site entrance road. Typically, street sweeper service is utilized frequently when needed along the roadway after hours; however, due to weather condition when this incident occurred, this service was not provided because of unsafe working conditions. Moreover, site staff was unable to address this incident at the time of occurrence also due to extreme inclement weather conditions which also caused unsafe working conditions for SCL operations and maintenance personnel. However, this item was addressed once weather condition allowed following the inspections. To minimize potential for reoccurrence under similar circumstances in the future, SCL staff is actively working with the different stakeholders at the site to identify areas and operation practices that could potentially be sources of waste migration off site. Once these potential point and activity sources are identified, additional measures such as hydroseeding, placement of straw waddles, litter fence, or jute matting on exposed slopes will be installed by October 1, 2023.

c. "The compromised riser and reduced capacity of the terminal basin"

In January 2023, SCL received 8.23 inches of rain within a 24-hour period. During one of the storm events in early January, one of the three riser pipes was damaged by floating debris causing its collapse. This excessive rain seen in one day in January and throughout the beginning of 2023 has made it unsafe or impractical to address the standpipe due to difficulty working heavy equipment in wet material. In early June, SCL actively started removal of sediment within the basin. Once the sediment has been removed, the repairs to the damaged pipe riser, including additional retrofit measures such as vertical structural support, to prevent reoccurrence will be completed by August 17, 2023.

Throughout the month of June, the drier soil was actively removed from the terminal basin. Soil removal from the basin is expected to be complete by July 31, 2023. Once the soil has been removed, a new standpipe will replace the damaged standpipe. The new standpipe and repaired skimmers will be complete by August 17th.

The LAQRWCB NOV also cited issues regarding the compromised riser. As indicated in the Response Memorandum, Site drainage infrastructure has been designed and constructed to meet the Los Angeles County Department of Public Works requirements for drainage infrastructure to handle a 50-year, 24-hour Bulked and Burned frequency storm. The calculated flows for this frequency are, at a minimum, 15% greater than the calculated flows for the 100-year, 24-hour frequency storm. However, during one of the storm events in early January, one of three riser pipes was damaged by floating debris causing its collapse. The multiple successive heavy rain events prohibited its immediate repair due to limited access and unsafe working

conditions. SCL considers this to be an anomaly, however, past events have proven the basin, including de-silting mechanisms installed in 2017, meet the regulatory requirements as proven by the stormwater sampling results that have been uploaded to SMARTS as part of compliance with the Industrial General Permit (IGP). Commencing in early June, SCL has actively started removal of sediment within the basin. Once the sediment has been removed, the repairs to the damaged pipe riser, including additional retrofit measures such as vertical structural support, to prevent reoccurrence, will be complete by August 17, 2023.

d. "Slope failure and sediment build-up"

The following is clarification, background information, and schedule of repairs on the Enclosure 3 pictures of the LA County June 1st Letter. The original before and after photos included in the Report are in Attachment 6:

Enclosure 3; Slope Failure No. 1:
- This is not a slope failure but an added stability buttress to reinforce the hillside that experienced a surficial slough. The hillside will further be buttressed during enhancements of interim access roads that are now underway. This portion of the access road will be complete by October 1st.
- In roughly August, 2023, it is anticipated that a new bypass road carrying all traffic will be shifted to the north, ultimately avoiding this location entirely.

Enclosure 3; Slope Failure No. 2:
- This slide is planned to be repaired by August 17th.
- Subsequently, the drainage below this slide will be inspected and repaired as part of our winterization prior to October 1st.

Enclosure 3; Sediment on Main Haul Route:
- SCL issued a Request for Proposals (RFP) to our list of qualified contractors to obtain repaving estimates. On June 16-17, 2023, the area of concern on the main road was repaved and is now completed. Additionally, a water truck is utilized on a daily basis to keep the haul road free of sediment, and additional cleaning is completed on an as-needed basis.

Enclosure 3; Front Entrance Erosion Photo 1:
- The front entrance erosion repairs will require permitting from the City of Los Angeles as it impacts the public right-of-way and will need to temporarily close one southbound lane for construction equipment to operate safely. Approval from the city is expected to take 1-2 months as of June 15, 2023
- SCL has issued an RFP and approved a contractor for this work and anticipates the necessary repairs to be complete by October 1, 2023 pending approval from the City. Once the approvals are given, Construction will work with the city to schedule the lane closure with expected completion time no later than October 1, 2023

Enclosure 3; Front Entrance Erosion Photo 2:
- The sediment pile and sediment along the acceleration lane will be removed in connection with the sediment removal behind the wall along San Fernando Road by October 1, 2023 or sooner.

SCL will prepare and submit a monthly Status Report for Corrective Actions until October 1, 2023, the next of which will be submitted on July 30, 2023 Additionally, a copy of the Wet Weather Preparedness Report/Winterization Plan will be provided on October 1, 2023 with the

final monthly status report. Should you have any questions or comments, please reach out to Paul Koster at the contact information below.

Thank you,

Paul D. Koster II
Environmental Manager, Sunshine Canyon Landfill
Pkoster@republicservices.com
(818) 698-9418

Attachments:

- Attachment 1 Site Map
- Attachment 2 April 30, 2023 Action Plan to LEA
- Attachment 3 Disposal Facility Inspection Report dated May 9th, 2023 from LEA
- Attachment 4 Regional Water Quality Control Board Notice of Violation
- Attachment 5 May 2023 SCL Litter Control and Recovery Program
- Attachment 6 Before and After Photos
- Attachment 7 June 16th, 2023 Notice of Violation Response Letter to LARWQCB

ATTACHMENT 1 SITE MAP

SUNSHINE CANYON
Landfill

14747 San Fernando Road
Sylmar, CA 91342

- Potential Areas of Erosion/Ponding Concern

SUNSHINE CANYON
Landfill

14747 San Fernando Road
Sylmar, CA 91342

ATTACHMENT 2 APRIL 30TH, 2023 ACTION PLAN TO LEA

SUNSHINE CANYON Landfill
14747 San Fernando Road
Sylmar, CA 91342

April 30, 2023

Mr. Dave Thompson
SCL – LEA Program Manager
5050 Commerce Drive
Baldwin Park, CA 91706

Ms. Dorcas Hanson-Lugo
5050 Commerce Drive
Baldwin Park, CA 91706

Subject: March 2023 Monthly Facility Report Drainage and Erosion Control Progress and Action Plan; Sunshine Canyon Landfill, SWFP No. 19-AA-2000

Dear Mr. Thompson and Ms. Hanson-Lugo:

Sunshine Canyon Landfill was issued a Notice of Violation in the Monthly Facility Report for the month of March 2023. The violation regarded Drainage and Erosion Control and identified specific areas around the site impacted by these issues. Areas of erosion rills, exposed trash, and blocked channels were identified, and the Operations team has been addressing them diligently over the past several weeks.

The challenges faced in the month of March are a result of a prolonged rain event that began in October 2022 and subsided in the end of March 2023. During this wet season SCL received over 55 inches of rain, an exceptionally high amount for the site which typically sees an average of 15 inches. This excessive rain made it unsafe or impractical to address the above-mentioned problem areas due difficulty working heavy equipment in wet material. Since the heavy rain has stopped the team has been working diligently on addressing these areas and remains dedicated to restoring the site to the pre-storm conditions.

The LEA's March 2023 Monthly Facility Inspection Report requested a plan detailing the corrective actions that will be taken and timelines for their completion with regard to the drainage and erosion controls. Below is a list of the individual action items by site area and the current status of the repairs.

Item Number	Area	Issue	Corrective Action	Status	Completion Date
1	Box Culvert	Structural Damage	Construction Repair	Complete	3/20/2023
2	Channel B	Sediment Build Up	Clean Out	Complete	3/23/2023
3	OBS Channel	Sediment Build Up	Clean Out	Complete	3/28/2023
4	Switchback	Erosion Rills + Trash Accumulation	Cover, Track Walk, Grade	Complete	3/28/2023
5	Soil Plug	Erosion Rills + Trash Accumulation	Cover, Track Walk, Grade	Complete	3/28/2023
6	Buttress	Erosion	Fill, Track Walk, Grade	Complete	3/29/2023
7	CC-3B	Erosion Rills + Exposed EnviroCover	Cover, Track Walk, Grade	Complete	4/10/2023
8	CC-4 P4A/B/C	Erosion Rills + Exposed EnviroCover	Cover, Track Walk, Grade	Complete	4/17/2023
9	Pencil Tip	Erosion Rills+ Exposed EnviroCover	Cover, Track Walk, Grade	Complete	4/24/2023
10	CC-3A	Erosion Rills	Cover, Track Walk, Grade	Complete	4/25/2023
11	CC4-P4A	Erosion and exposed piping	Cover	Complete	4/29/2023
12	Wet Weather Deck	Flagging Trash	Cover and grade	In Progress	5/31/2023

13	Site-wide	Existing grading in some areas does not promote positive drainage	Continued site inspections and weekly grading on as-needed basis;	In Progress	10/1/2023
14	Main Haul Road	Erosion under damaged channel	Evaluate and Repair	Pending	10/1/2023*
15	Site-wide	Small erosion rills	Cover, Track Walk, Grade	In Progress	10/1/2023
16	Terminal Basin	Standpipe repair	Repair standpipe	In Progress	10/1/2023*

* The SCL Team assesses conditions and weather forecasts weekly to determine if is safe/practical to start repairs; however, repairs will be complete by October 1.

As demonstrated above and in the attached photographs, the areas noted in the inspection report have since been corrected, with the exception of the last five items which will continue to be on-going efforts as this rainy season continues. All exposed trash as a result of erosion has been covered and rectified. Small (surface) erosion rills are monitored and corrected before trash becomes exposed, and all will be covered completely prior to October 1. The team will continue to evaluate and inspect the facility on daily basis and perform corrective actions in a timely matter. The heavy rains experienced this year have also brought the site team the benefit of understanding the potentially 'at-risk' areas of the facility, which will be more thoroughly evaluated and addressed as part of the upcoming Wet Weather Preparedness Plan.

Should you have any questions, please don't hesitate to contact me.

Sincerely,

Kate Downey
Team Environmental Manager
Sunshine Canyon Landfill
(818) 698-9418

Attachment 1: Photographs of Corrective Actions

Area 1 Box Culvert Before

Area 1 Box Culvert After

Area 2 Basin B Channel Before

Area 2 Basin B Channel After

Area 3 Observation Deck Channel Before

Area 3 Observation Deck Channel After

Area 3 Observation Deck Channel Before

Area 3 Observation Deck Channel After

Area Switchback 4 Before

Area 4 Switchback After

Area 5 Soil Plug Before

Area 5 Soil Plug After

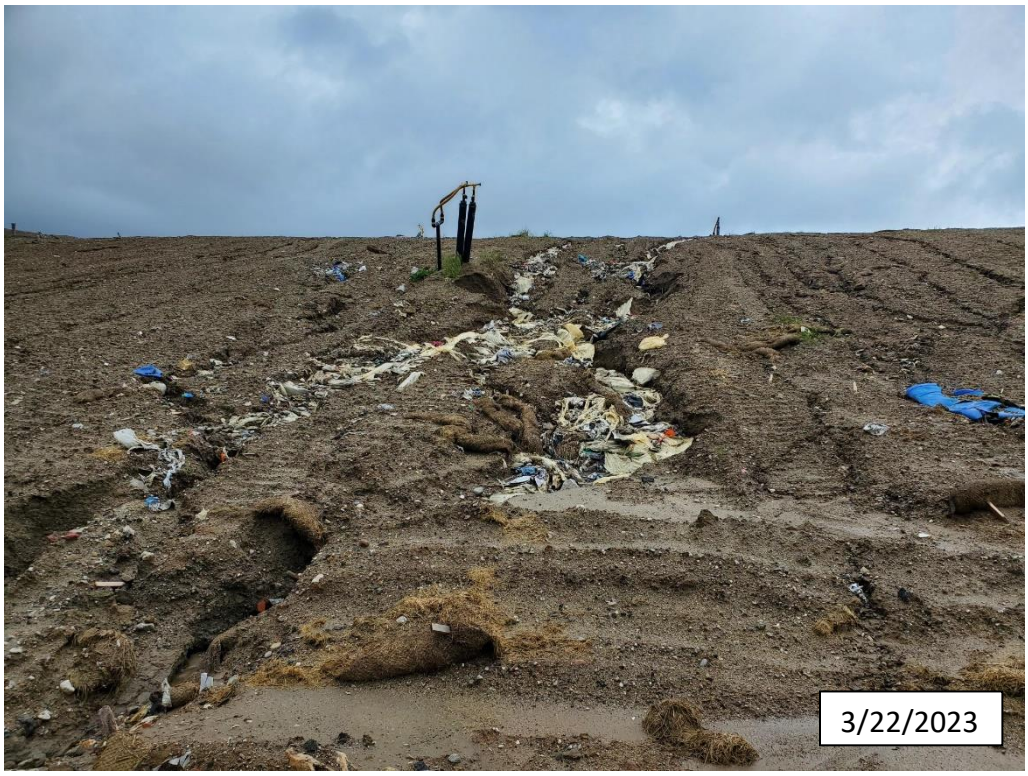
Area 6 Buttress Before

Area 6 Buttress After

Area 7 CC-3B Before

Area 7 CC-3B After

Area 7 CC-3B Before



Area 7 CC-3B After

Area 8 CC-4 Before

Area 8 CC-4 After

Area 8 CC-4 Before

Area 8 CC-4 After

Area 9 Pencil Tip Before

Area 9 Pencil Tip After

Area 10 CC-3A Before

Area 10 CC-3A After

SUNSHINE CANYON Landfill

14747 San Fernando Road
Sylmar, CA 91342

ATTACHMENT 3 DISPOSAL FACILITY INSPECTION REPORT DATED MAY 9TH, 2023 FROM LEA

Disposal Facility (Site) Inspection Report (52)
Sunshine Canyon City/County Landfill (19-AA-2000)
4/28/2023

Inspection Information

Inspected By: Sunshine Canyon Landfill
Local Inspection ID:
Inspection Date: 4/28/2023
Time In:
Inspection Type: Periodic
Time Out:
Inspector: Rasaq Ayodele
Inspection Duration:
Operator: Browning-Ferris Ind. Of Calif., Inc.
Received By:
Also Present (Name):

Facility/Activity Information

Enforcement Agency: Sunshine Canyon Landfill Jurisdiction
SWIS Number: 19-AA-2000

Facility: **Sunshine Canyon City/County Landfill**
14747 San Fernando Road, Sylmar
Sunshine LF (in Los Angeles County), CA 91342

Activity: Solid Waste Landfill

Operational Status: Active
Regulatory Status: Permitted

Land Owners(s):

Browning-Ferris Ind. Of Calif., Inc.

The above facility was inspected for compliance with applicable sections of Division 30 of the Public Resources Code (PRC) and Title 14 and Title 27, California Code of Regulations (CCR).

No Violations

No Areas of Concern

Inspection Report Comments

This report is a compilation of the SCL-LEA staff observations for the month of April 2023.

The Areas of Concern (Gas Monitoring and Control) marked in the March 2023 inspection report has been corrected by the operator.

The Violation issued for Drainage and Erosion Control (27 CCR 20820) has also been corrected.

During this past season, the landfill received a total of approximately 55 inches of rain. The frequency of the different storm events was problematic in correcting the areas of erosion due to the saturated soil conditions that prevented the use of heavy equipment. As noted in the past inspection reports, this caused problems with the drainage system and caused several erosional ruts where litter was exposed. The landfill had been cited for violations of the drainage and erosion control regulations. The LEA instructed the operator to evaluate the facility, submit an Action Plan and to expedite the repair work.

As requested, the operator submitted an Action Plan to the LEA to address the erosion and drainage issues. The operator has accelerated the repair work by allocating extra resources to the project and by having one of their contractors work overtime. As of the end of April 2023, all of the areas of exposed waste have been covered with dirt and the major erosional ruts have been repaired. The drainage channels that had substantial sedimentation have been cleared and precipitation can flow freely off of the landfill.

As identified in the Action Plan, the landfill will continue to work on tracking in the small erosional rills on the slopes of the landfill, identifying and correcting grading issues and completing final repairs to the drainage system. This work will all be completed prior to the next season starting on October 1, 2023.

Currently, ADC (enviro cover) and soil are being used for daily cover.

The traffic flow at the working face area was well controlled.

Spotters were on site controlling traffic.

Litter fences were placed around the working faces to assist in controlling litter.

No litter outside the permitted area observed during this observation period.

The waste hauling roads and the working face area were watered regularly during the disposal operation to minimized dust generation.

No Attachments

SUNSHINE CANYON Landfill

14747 San Fernando Road
Sylmar, CA 91342

ATTACHMENT 4 JUNE 16TH, 2023 LARWQCB NOTICE OF VIOLATION

May 17, 2023

Kate Downey, Environmental Manager
Sunshine Canyon City/County Landfill
14747 San Fernando Road
Sylmar, CA 91342
kdowney@republicservices.com

Certified Mail
Return Receipt Requested
Claim No. 7022 3330 0000 0513 9262

NOTICE OF VIOLATION OF WASTE DISCHARGE REQUIREMENTS AND NPDES STORMWATER PERMIT - SUNSHINE CANYON CITY/COUNTY LANDFILL, SYLMAR, CALIFORNIA (ORDER NO. R4-2008-0088, WDID NO. 19I001306, GEOTRACKER GLOBAL ID L10006014618)

Dear Kate Downey:

The California Regional Water Quality Control Board, Los Angeles Region (Los Angeles Water Board), is the public agency with primary responsibility for the protection of ground and surface water quality within major portions of Los Angeles and Ventura Counties. The Los Angeles Water Board hereby issues this notice of violation (NOV) to Republic Services (Discharger), which owns and operates the Sunshine Canyon City/County Landfill (Landfill), a Class III municipal solid waste landfill that is located at 14747 San Fernando Road, Sylmar, California.

The Landfill is regulated under waste discharge requirements (WDRs) Order No. R4-2008-0088, adopted by the Los Angeles Water Board on October 2, 2008, for the discharge of municipal solid wastes. The WDRs includes requirements for the construction, operations, and closure and post closure maintenance of the Landfill to protect ground and surface water resources of the State. In addition, the Landfill is also regulated under the State Water Resources Control Board National Pollutant Discharge Elimination System (NPDES) General Permit for stormwater discharges associated with industrial activities (IGP, WDID No. 19I001306, enrolled since March 27, 1992).

On March 21, 2023, the Los Angeles County Department of Public Works informed the Los Angeles Water Board that, based on a January 31, 2023, inspection by the Sunshine Canyon Landfill-Local Enforcement Agency (SCL-LEA), the Landfill experienced several problems with the drainage system due to high volume flow of stormwater and construction activity at the Landfill. Many of the landfill's drainage ditches along the haul

road became overwhelmed with sediment and rocks. This redirected runoff onto the haul road and caused trash, water, and mud to be discharged out the front gate of the Landfill. One of the three vertical riser drain structures in the terminal sediment basin of the Landfill collapsed, causing trash to pass through the down pipe and flow offsite onto Bull Creek, which is part of the Los Angeles County storm sewer system that drains to the Los Angeles River, a water of the State. The inspection report also indicates that two large ponds formed on top of the closed City Landfill South area of the Landfill. The SCL-LEA inspection report is included herein as Attachment 1.

On April 3, 2023, the Los Angeles Water Board staff inspected the Landfill and observed that the collapsed riser drain structure at the terminal sediment basin was still in disrepair. Because of this damage, the sediment basin's retention capacity was significantly reduced and there was evidence indicating that a significant amount of sediments had been washed into the storm sewer during the storm events since January 2023. During the inspection, staff also observed ponding of stormwater on top of the Landfill. Observations of the Los Angeles Water Board staff inspection on April 3, 2023, are documented in the Los Angeles Water Board inspection report that is included herein as Attachment 2.

You are hereby informed that, based on the observations documented in the SCL-LEA January 31, 2023, inspection report, the Los Angeles Water Board staff April 3, 2023, inspection report, and a review of the Storm Water Pollution Prevention Plan (SWPPP) that the Discharger submitted to the Los Angeles Water Board on December 22, 2021, pursuant to the IGP, the Discharger is in violation of the following requirements and provision of the WDRs and the IGP:

1. Section E.2 of the WDRs requires that "*Drainage controls, structures, and facilities shall be designed to divert any precipitation or tributary runoff and prevent ponding and percolation of water at the Landfill in compliance with sections 20365 and 21090(b)(1) of 27 CCR. When necessary, temporary structures shall be installed as needed to comply with this requirement.*" Ponding of stormwater was observed during both the SCL-LEA and Los Angeles Water Board staff inspection of the Landfill;

2. Section E.3 of the WDRs requires that "*The Landfill shall be graded and maintained to promote runoff of precipitation and to prevent ponding of liquids and surface water. Erosion or washout of refuse or cover materials by surface flow shall be controlled to prevent off-site migration."* The current conditions of the Landfill indicate that the Landfill is not graded and maintained to promote runoff of precipitation and to prevent ponding of liquids and surface water*;*

3. Section E. 4 of the WDRs requires that "*Wastes deposited at the Landfill shall be confined thereto, and shall not be permitted to blow, fall, or otherwise migrate off-site, or to enter off-site water drainage facilities or watercourses.*" The migration of

wastes to off-site, or evidence of such migration, was observed during both the SCL-LEA and Los Angeles Water Board inspections;

4. Section E. 17 of the WDRs require that "*The Discharger shall report any noncompliance or any incident resulting from operations at the Landfill that are in violation of this Order. Any such information shall be provided verbally to the designated Regional Board staff contact within 24 hours from the time the Discharger becomes aware of the circumstances. A written submission shall be provided to the Regional Board within seven days of the time that the Discharger becomes aware of the circumstances."* The Discharger did not report the considerable damage to the stormwater drainage system at the Landfill, including the collapsed riser drain structure at the terminal sediment basin, to the Los Angeles Water Board in accordance with this requirement;

5. Section K. 1.a. of the WDRs requires that "*Waste management units shall be designed, constructed, and maintained to prevent, to the greatest extent possible, ponding, infiltration, inundation, erosion, slope failure, and washout which could occur as a result of precipitation from a 100-year, 24-hour frequency storm."* The collapsed riser drain structure at the Landfill in January 2023, and its continuous disrepair thereafter, indicate that the drainage system at the Landfill does not meet this requirement;

6. Section K.4. of the WDRs requires that "*All drainage structures shall be protected and maintained continuously to ensure their effectiveness,"* The observations documented in the SCL-LEA and Los Angeles Water Board staff inspection reports indicate that the Discharger is not compliance with this requirement;

7. Section III.C of the IGP prohibits *"Industrial stormwater discharges and authorized NSWDs that contain pollutants that cause or threaten to cause pollution, contamination, or nuisance as defined in section 13050 of the Water Code". A* broken riser in the terminal basin led to the discharge of sediment laden stormwater from the Landfill into Bull Creek, which flows into the Los Angeles River*;*

8. Section X.H.1.b.ii of the IGP requires dischargers to "*observe the identified equipment and systems to detect leaks, or identify conditions that may result in the development of leaks."* The preventative maintenance section in the SWPPP does not include procedures for inspecting the structural integrity of the risers;

9. Section X.H.4.a.v of the IGP requires dischargers to "*ensure the SWPPP identifies each BMP being implemented at the facility, including the procedures, including maintenance procedures, and/or instructions to implement the BMP effectively."*

The SWPPP does not include the design size, the load capacity, or the maintenance procedures for the risers;

10. Section X.H.1.e.ii of the IGP requires dischargers to "*provide effective stabilization for inactive areas, finished slopes and other erodible areas prior to a forecasted storm event."* Erosion rills were observed on the sloped areas bordering the landfill, and sediment was observed in the basins and culverts; and

11. Section XI, Table 2 in the IGP lists the Numerical Action Level (NAL) for total suspended solids. The instantaneous maximum NAL for total suspended solids is 400 mg/L. The total suspended solids concentration reported to the Los Angeles Water Board on April 11, 2023, was 1,600 mg/L. You are required to implement best management practices to prevent future exceedances of the NAL for total suspended solids.

You are directed to immediately correct the above cited violations of the WDRs and the IGP. Within 30 days from the date of this NOV, the Discharger shall submit a written response to the Los Angeles Water Board to report all corrective actions that have been taken and actions that are planned to mitigate conditions of the Landfill that are in violation of the WDRs and IGP. No later than 90 days from the date of this NOV, the Discharger shall submit a report to the Los Angeles Water Board to demonstrate that the Landfill's drainage system, including all drainage channels, sediment retention basins, and interim and final covers are in compliance with the WDRs and the IGP.

The violations of WDRs subject you to enforcement actions, including administrative civil liability. Pursuant to the California Water Code section §13350(e), you are subject to penalties of up to five thousand dollars ($5,000) for each day in which the violations occur. These administrative civil liabilities may be assessed by the Los Angeles Water Board beginning with the date that the violations first occurred and without further warning. This matter may also be referred to the office of the Attorney General for further enforcement. The Los Angeles Water Board reserves the right to take any further enforcement action authorized by law.

The violations of the IGP subject you to enforcement actions, including administrative civil liability. Pursuant to California Water Code section 13385, subdivision (c)(1), the Permittee is subject to discretionary administrative civil liability of up to ten thousand dollars ($10,000) for each day in which the violation(s) occurs. The discretionary administrative civil liability may be assessed by the Los Angeles Water Board beginning with the date that the violation(s) first occurred. The Los Angeles Water Board may also refer this matter to the Attorney General's Office for further enforcement. Please note that this Notice shall not be deemed to relieve you of liability for any penalties that may have already accrued. The Los Angeles Board reserves its right to take any further enforcement action authorized by law.

If you have any questions, please contact Wen Yang, Supervisor of the Los Angeles Water Board Land Disposal Unit, at Wen.Yang@waterboards.ca.gov or (213) 620-2253, or Pavlova Vitale, Supervisor of the Los Angeles Water Board Land Enforcement Unit II, at Pavlova.Vitale@waterboards.ca.gov or (213)576-6751.

Sincerely,

Hugh Marley
Assistant Executive Officer

Enclosures:

SCL-LEA Inspection Report, January 31, 2023
Los Angeles Water Board Inspection Report, April 3, 2023

Cc:

Michael Wochnick, CalRecycle (Michael.Wochnick@CalRecycle.ca.gov)
Dorcus Hanson-Lugo, Sunshine Canyon Landfill LEA (dlugo@ph.lacounty.gov)
David Thompson, Sunshine Canyon Landfill LEA (david.thompson@lacity.org)
Jessica Brown, City of Los Angeles (jessica.brown@lacity.org)
Larry Israel, SCAQMD (lisrael@aqmd.gov)
Elvira Delgadillo, Los Angeles County Public Works (edelgadillo@dpw.lacounty.gov)
Wayde Hunter, North Valley Coalition, Granada Hills (WHunter01@aol.com)

SUNSHINE CANYON Landfill

14747 San Fernando Road
Sylmar, CA 91342

ATTACHMENT 5 MAY 2023 SCL LITTER CONTROL AND RECOVERY PROGRAM

SUNSHINE CANYON Landfill
14747 San Fernando Road
Sylmar, CA 91342

Sunshine Canyon Landfill
Litter Control & Recovery Program

Revised May, 2023

1.0 Background

The Sunshine Canyon Landfill (SCL) is required to control litter and debris based on several conditions of it's City and County landfill permits.

County Conditional Use Permit 00-194-(5) condition 46 requires SCL to develop a program to prevent waste under SCL's control from escaping offsite in the form of litter. Condition 47 requires SCL to implement methods or procedures to prevent vehicles leaving the facility carrying dirt and/or debris that may be dislodged onto local streets and highways. Condition 48 requires that SCL maintain a litter control and recovery program to control the discharge and recovery of off-site litter from uncovered or improperly covered loads or otherwise emanating from the landfill.

Other requirements for litter control exist in the conditions Q C.6 and M 4.9.3. of the SCL's City Landfill MMRS.

The procedures in place to meet CUP Conditions 46, 47, and 48 and the City MMRS are covered in this document. Unless otherwise noted, conditions apply to both portions of the landfill (City and County.)

The facility also maintains several related programs. A Fugitive Dust Program and a Covered Vehicle Mandate are on file at SCL. This document will not duplicate information covered in these other plans.

2.0 Onsite Litter Patrols

SCL personnel or contracted laborers, shall routinely patrol the access roads to the Landfill scales during the Landfill hours of operation, and remove any litter found during the patrol.

All incoming loads are subject the SCL's covered vehicle mandate. Due to the need for waste inspection at the scales, vehicles un-tarp/uncover their loads prior to the scales. If a load is likely to create significant litter between the scales and the working face, it will, if practical, be re-

tarped/recovered prior to proceeding to the working face. If a load that is a likely source of significant litter is not recovered/re-tarped, it will be escorted to the working face.

All debris or litter found on or along the entrance to the Landfill and/or Working Face access roads shall be immediately removed.

3.0 Working Face Protection

At every active working face area, SCL will install a primary litter fence of at least eight feet in height. A secondary fence of at least four feet in height will be used behind the primary fence if wind conditions dictate.

On windy days (> 15 mph) and when the fences are not sufficient, the working face shall be moved to an area of minimal wind exposure, such as up a slope. Additional measures may be employed as necessary to control litter. The Local Enforcement Agencies (LEAs) may mandate the closure of the working face if deemed necessary to control litter.

Waste at the working face will be compacted to 1400 lb/cy. Waste materials will be covered with at least 6 inches soil or an approved alternative daily cover, (ADC) daily. The active working faces will be kept as small as safely possible given the type and quantity of landfill equipment.

4.0 Local Water Body Protection

Stormwater is collected on site through drainage channels that lead to four possible sedimentation basins. The four basins are: Basin A, located on the West Side of SCL, Basin D, located in the Northwest corner of the landfill, Basin B, located in the Northeast corner of the landfill, and the Terminal basin located on the East side of the landfill near the front entrance. The purpose of these basins is to prevent sediment and debris from exiting the landfill and into public water ways.

SCL personnel, or contracted laborers, shall routinely patrol the stormwater channels and sediment basins located on the perimeter of the landfill to remove any litter noticed. If litter is observed frequently, additional litter fencing will be placed around these areas to prevent wind-blown litter from entering the drainage conveyance or basin.

In the event that litter or debris is observed to enter a water body, SCL personnel will immediately notify appropriate agencies, including the Los Angeles Regional Water Board or others as applicable according to current regulatory requirements.

5.0 City Landfill Perimeter Fencing

Litter fences will be located where necessary along the outside perimeter of the landfill. The fences will be cleaned regularly to keep refuse to a minimum. Litter fences are replaced yearly to ensue they remain effective.

6.0 Offsite Litter Control and Recovery Program

Sunshine Canyon Landfill personnel will survey specific areas around the landfill every day the site is open for business for purposes of collecting any litter encountered. Litter will be collected in plastic bags and brought back to the site for disposal. All off-site areas survey areas are no more than 1.5 miles from the property boundary of the landfill as required by CUP Condition No. 48. The off-site survey areas are shown on Figure 1. Please note that all the routes include the landfill entrance up to the scale house area. This portion of the routes is shown in white on Figure 1.

6.1 Survey Routes and Procedures

The following describes the survey routes to be addressed. It should be noted that due to the high speeds that vehicles travel on San Fernando Road and the lack of sidewalks or a shoulder, only the west side of San Fernando Road will be monitored by site personnel. It is considered un-safe for personnel to walk along the eastern side of San Fernando Road. For all other streets listed below, both sides of the street will be monitored. Any debris noticed in vegetation, gutters, or roadways shall be collected and brought back to site for disposal.

Monday – O'Melveny Route (Yellow Route on Figure 1)

Two (2) temporary laborers will be dropped off at the entrance to O'Melveny Park on Sesnon Blvd. One laborer will walk on one side of the road and one on the other side of the road along the following route:

- Walk east on Sesnon Blvd. to Balboa Blvd
- Turn left on Balboa Blvd
- Turn left on Balboa Rd
- Turn left (north) on San Fernando Road past the landfill entrance to the Balboa Blvd off- ramp of the I-5 Freeway
- Turn around and walk south on San Fernando Road back to the landfill entrance

This route will be driven by a Sunshine Canyon Landfill spotter and temporary laborer to collect all plastic bags filled during the survey and any bulky items. The plastic bags and bulky items will be taken back to the landfill for disposal.

Tuesday – Woodley Route (Red Route on Figure 1)

Two (2) temporary laborers will be dropped off at the intersection of Woodley Ave and Balboa Blvd. One laborer will walk on one side of the road and one on the other side of the road along the following route:

- Walk north on Balboa Blvd.
- Turn left on Balboa Rd
- Turn left (north) on San Fernando Road past the landfill entrance to the Balboa Blvd off- ramp of the I-5 Freeway
- Turn around and walk south on San Fernando Road back to the landfill entrance
- Continue up haul road to scale house

This route will be driven by a Sunshine Canyon Landfill spotter and temporary laborer to collect all plastic bags filled during the survey and any bulky items. The plastic bags and bulky items will be taken back to the landfill for disposal.

Wednesday – Old Sepulveda Route (Blue Route on Figure 1)

Two (2) temporary laborers will be dropped off at the southernmost end of Old Sepulveda Blvd (Old Sepulveda and Roxford St). One laborer will walk on one side of the road and one on the other side of the road along the following route:

- Walk north on Old Sepulveda Blvd
- Turn left (north) on San Fernando Road past the landfill entrance to the Balboa Blvd off-ramp of the I-5 Freeway
- Turn around and walk south on San Fernando Road back to the landfill entrance
- Continue up haul road to scale house

This route will be driven by a Sunshine Canyon Landfill spotter and temporary laborer to collect all plastic bags filled during the survey and any bulky items. The plastic bags and bulky items will be taken back to the landfill for disposal.

Thursday – Yarnell Route (Green Route on Figure 1)

Two (2) temporary laborers will be dropped off at the intersection of Yarnell St and Foothill Blvd. One laborer will walk on one side of the road and one on the other side of the road along the following route:

- Walk north on Foothill Blvd
- Turn left on Balboa Blvd and walk south to Balboa Rd
- Turn right onto Balboa Road to San Fernando
- San Fernando Road past the landfill entrance to the Balboa off-ramp of the I-5 freeway
- Turn around and walk south on San Fernando Road back to landfill entrance
- Continue up haul road to scale house

This route will be driven by a Sunshine Canyon Landfill spotter and temporary laborer to collect all plastic bags filled during the survey and any bulky items. The plastic bags and bulky items will be taken back to the landfill for disposal.

Friday –Old Road/Sierra Highway up to Highway 14 Overpass Route (Orange Route on Figure 1)

Two (2) temporary laborers will be dropped off where Highway 14 crosses over Sierra Highway. The following route will be monitored:

- Walk west then south along Sierra Highway to San Fernando Road
- Turn left (south) on San Fernando Road to the landfill entrance
- Continue up haul road to scale house

This route will be driven by a Sunshine Canyon Landfill spotter and temporary laborer to collect all plastic bags filled during the survey and any bulky items. The plastic bags and bulky items will be taken back to the landfill for disposal.

6.2 Documentation

The Off-Site Survey Form (attached) will be completed each day a survey is performed. The completed form will be turned in to the Environmental Team at the completion of each survey. The forms will be kept in the Environmental Technicians' office in a separate binder labeled "Daily Neighborhood Survey". Each day a survey is conducted, a Sunshine Canyon Landfill employee will drive each of the survey routes to assess whether any additional litter

pick-up is required. This additional patrol will be documented on the Daily Neighborhood Survey form as well as any actions taken as a result of the additional patrol.

Figure 1:

Offsite Daily Neighborhood Survey and Map

SUNSHINE CANYON Landfill

14747 San Fernando Road
Sylmar, CA 91342

SUNSHINE CANYON Landfill
14747 San Fernando Road
Sylmar, CA 91342

DAILY NEIGHBORHOOD SURVEY PLAN FORM A

DAY OF THE WEEK _____ DATE _____

SURVEYORS: _____

TIME OF SURVEY:
(START TO END) _____

ROUTE PICKED: _____

DUST WHEN & WHERE _____ N/A _____

_____ ODOR WHEN & WHERE _____

WHERE OTHER DAILY ROUTE PATROLLED YES _____ NO _____

DESCRIPTION & AMOUNT OF ITEMS COLLECTED: _____

_____

MAPS OF AREAS PATROLLED (ON REVERSE) _____

COMMENTS: _____

_____

SUPERVISOR SIGN-OFF: _____

SUNSHINE CANYON
Landfill

14747 San Fernando Road
Sylmar, CA 91342

ATTACHMENT 6 BEFORE AND AFTER PHOTOS

SUNSHINE CANYON
Landfill
14747 San Fernando Road
Sylmar, CA 91342

Area Switchback 1 Before

Area 1 Switchback After

SUNSHINE CANYON
Landfill
14747 San Fernando Road
Sylmar, CA 91342

Area 2 Soil Plug Before

Area 2 Soil Plug After

SUNSHINE CANYON
Landfill
14747 San Fernando Road
Sylmar, CA 91342

Area 3 Buttress Before

Area 3 Buttress After

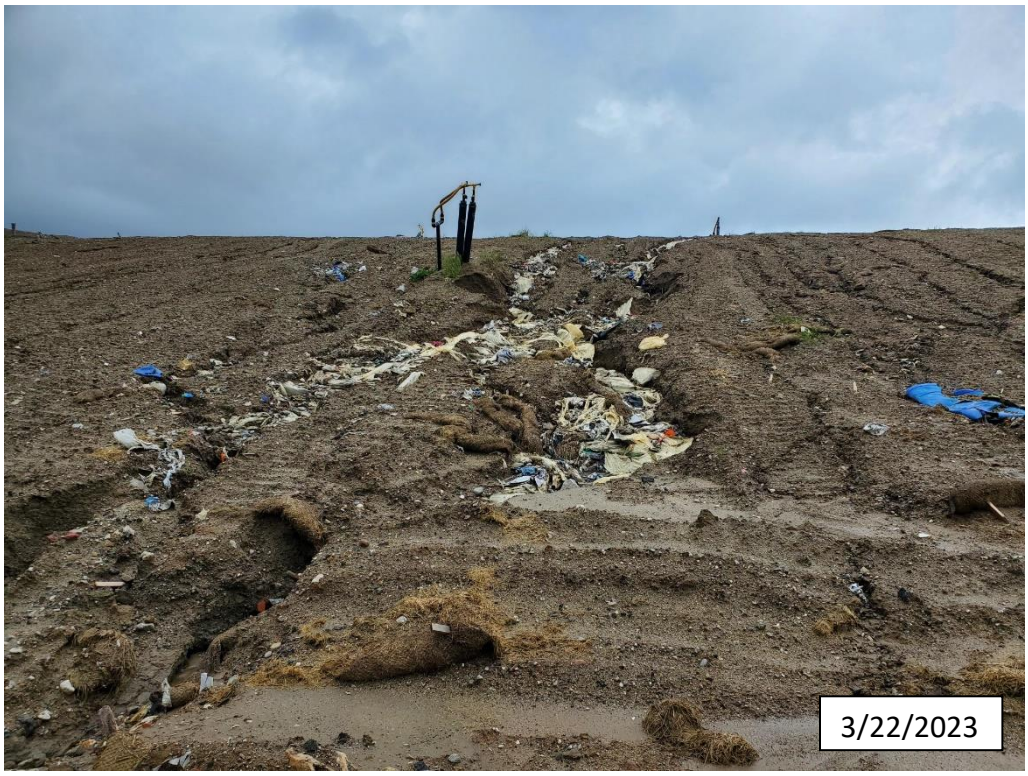
SUNSHINE CANYON
Landfill
14747 San Fernando Road
Sylmar, CA 91342

Area 4 CC-3B Before

Area 4 CC-3B After

SUNSHINE CANYON
Landfill
14747 San Fernando Road
Sylmar, CA 91342

Area 4 CC-3B Before



Area 4 CC-3B After

SUNSHINE CANYON
Landfill
14747 San Fernando Road
Sylmar, CA 91342

Area 5 CC-4 Before

Area 5 CC-4 After

SUNSHINE CANYON
Landfill

14747 San Fernando Road
Sylmar, CA 91342

Area 5 CC-4 Before

Area 5 CC-4 After

SUNSHINE CANYON
Landfill
14747 San Fernando Road
Sylmar, CA 91342

Area 6 Pencil Tip Before

Area 6 Pencil Tip After

SUNSHINE CANYON
Landfill

14747 San Fernando Road
Sylmar, CA 91342

Area 7 CC-3A Before

Area 7 CC-3A After

SUNSHINE CANYON
Landfill
14747 San Fernando Road
Sylmar, CA 91342

Trash, water, and mud on San Fernando Road Before 1

Trash, water, and mud on San Fernando After 1

SUNSHINE CANYON Landfill
14747 San Fernando Road
Sylmar, CA 91342

Trash, water, and mud on San Fernando Road Before 2

Trash, water, and mud on San Fernando Road After 2

SUNSHINE CANYON Landfill

14747 San Fernando Road
Sylmar, CA 91342

ATTACHMENT 7 June 16th, 2023, Notice of Violation Response Letter to LARWQCB

SUNSHINE CANYON Landfill

114747 San Fernando Road
Sylmar, CA 91342

June 16, 2023

Dr. Wen Yang
Chief, Land Disposal Unit
Regional Water Quality Control Board
Los Angeles Region
320 West 4th Street, Suite 200
Los Angeles, CA 90013

Re: Sunshine Canyon Landfill, File No. 58-076
Notice of Violation of Waste Discharge Requirements and NPDES Stormwater Permit (Order No. R-4-2008-008, WDID No. 19I001306, Geotracker Global ID. L10006014618) dated May 17, 2023

Dear Dr. Yang:

This letter is in response to the Regional Water Quality Control Board (RWQCB) Notice of Violation (NOV) dated May 17, 2023 related to violations of the Waste Discharge Requirements and NPDES Stormwater Permit observed during inspections on January 31, 2023 by the Los Angeles County Department of Public Works and April 3, 2023 by the RWQCB staff. Each of the eleven conditions cited in the letter are addressed below. In addition, a copy of the 2023 Wet Weather Preparedness Report and Winter Operations Plan has been included in Attachment 1 as well as the Sunshine Canyon Landfill Monthly Activity Report and Additional Corrective Measures dates April 30, 2023 in Attachment 2.

Please do not hesitate to contact me via phone at (818) 200-3016 or by email at pkoster@republicservices.com.

Sincerely,

Paul D. Koster
Environmental Manager