

April 17, 2023

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

FROM: Michael Harmon, Staff

STAFF REPORT
PROPOSED JOINT TECHNICAL DOCUMENT AMENDMENT APPLICATION SUBMITTED
TO THE LOCAL ENFORCEMENT AGENCY

On January 31, 2023, Republic Services, Inc. (Republic) submitted a Joint Technical Document (JTD) Amendment Application Package to the Sunshine Canyon Landfill Local Enforcement Agency (SCL – LEA) as part of the LEA's Five-year routine review process. Per the Subcommittee's request on February 16, 2023, this Staff Report provides a review of the submittal to the SCL-LEA for consistency with the Landfill's Conditional Use Permit (CUP) 00-194-(5) and the Revised Exhibit A-2, effective April 18, 2013, issued by the Los Angeles County Department of Regional Planning (County Regional Planning), and the Finding of Conformance granted by the Task Force on December 18, 2008.

Per the application package, most recent updates to the Sunshine Canyon Landfill (Landfill) JTD include revisions to the Final Grading Plan and extending duration of use of Enviro Cover as alternative daily cover up to 48 hours on weekends.

The Facility and Plan Review Subcommittee's staff received the attached memorandum from Republic Services dated March 28, 2023, regarding the Proposed JTD Amendment Package. The memo asserted the following:

1. The maximum vertical height of the Landfill in the County Jurisdiction as provided in the Exhibit A-2 shows a single, dashed line centralized within the highest solid contour line of 1,875 feet. Therefore, the maximum elevation in the County Jurisdiction is 1,904 feet.
2. The maximum vertical height of the Landfill in the City of Los Angeles (City) Jurisdiction is governed by the CUP Condition 1. K. which states, "*the combined City/County landfill conducted in either or both the City and County jurisdictions, the ultimate development of which is depicted on Exhibit "A-2" of this grant and on Exhibit "E-4B" of the City Ordinance (the portion of said Exhibit covering the City jurisdiction only)*".

The memo acknowledged the typographical error regarding the Landfill termination date and that it will be revised to reflect the effective termination date of 2037. The memo also acknowledges that Republic will modify the proposed language regarding the use of Enviro Cover which will adhere to applicable requirements outside of the SCL-LEA.

Staff Findings

- The Finding of Conformance granted by the Task Force on December 18, 2008, provides Attachment H – "Final Grading Plan, Sunshine Canyon Landfill JTD 2007". The Final Grading Plan provides the final grading elevations in the County and in the City as 1,904 feet and 2,004 feet, respectively.
- Finding number 47. F. of the Findings of the Board of Supervisors and Order Conditional Use Permit Number 00-194-(5) states *"Strictest Condition Requirement. If a discrepancy arises between a City condition and a County condition regarding Landfill operations, the applicant shall be required to incorporate into the County permit the condition that results in the greater protection to the surrounding community".*

Staff Recommendations

Based on the finding as stated above, Staff provides the following recommendations:

1. With respect to the maximum elevation in the County Jurisdiction, Staff recommends County Regional Planning investigate Republic's assertion regarding the maximum elevation per the Exhibit A-2 adopted by County Regional Planning on April 18, 2013 and provide findings to the Task Force for further discussion.
2. With respect to the maximum elevation on City Jurisdiction, Staff recommends County Regional Planning review the CUP and City Zoning Ordinance to determine the validity of Republic's assertion and provide findings to the Task force for further discussion.

Staff will continue to work with the SCL-LEA to track the next JTD submittal and update the Subcommittee on modifications regarding the termination date and applicable requirements for the use of Enviro Cover outside of the SCL-LEA purview.

MH:cs

P:\epub\Budget\TASK FORCE\2-Facility and Plan Review Subcommittee\2023\April\Staff Report SCL - JTD Update April 04.17.23.docx

Attach.

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

Cc: Michael Harmon, Los Angeles County Public Works
Los Angeles County Regional Planning

From: Kate Downey, Sunshine Canyon Landfill

Date: March 28, 2023

Subject: **Proposed Joint Technical Document Amendment Application
Submitted to the Local Enforcement Agency**

This memorandum has been prepared in response to Los Angeles County Public Works' Staff Report dated February 9, 2023 to Members of the Facility and Plan Review Subcommittee/Integrated Waste Management Task Force.

The Staff Report indicates that within Sunshine Canyon Landfill's recent JTD Amendment Application Package to the SCL-LEA, there were three items "inconsistent with the CUP and Revised Exhibit A-2: final fill contours, maximum elevations, and termination date of the landfill". The application package was rescinded and will be resubmitted with some additional minor modifications. We also wish to provide the following clarifying remarks:

Maximum Vertical Height of Landfill in County Jurisdiction

Closer inspection of the contouring on the revised Exhibit A-2 shows a single, hashed contour line centralized inside the 1,875-contour line, which has been highlighted in yellow for reference in the attached copy of the revised Exhibit A-2, and represents the 1,904-contour line.

Condition 17.B.5 of the Solid Waste Facility Permit states "The permitted maximum elevation of 1,904 ft. (MSL) on portions within the County of Los Angeles boundary shall include the final cap and cover within the maximum elevation of MSW not exceeding 1,900 ft. (MSL)...".

The proposed grading in the JTD amendment shows an ultimate buildout of the Combined City/County landfill which does not exceed 1,904 on the County portion of the landfill, which is consistent with the Exhibit A-2 of the CUP and the Solid Waste Facility Permit.

Maximum Vertical Height of Landfill in City Jurisdiction

The maximum height of the Combined City/County Landfill in the City jurisdiction is governed by the City "Q" Conditions. This is recognized in the County CUP, wherein the CUP defines the "City/County Project" as "the combined City/County landfill conducted in either or both the City and County jurisdictions, the ultimate development of which is depicted on Exhibit "A-2" of this grant *and on Exhibit "E-4B" of the City Ordinance (the portion of said Exhibit covering the City jurisdiction only)*" (Emphasis added).

The City's "Q" Conditions state that "the subject property shall be developed substantially in conformance with Exhibit No. E-4B-D..."

Condition B.2.d.2 of the City's Q Conditions says the combined City/County landfill at build out "would result in a final fill elevation (at its top deck) of 2,000 M.S.L. as shown in Exhibit E-4B and E-4C."

Exhibit E-4B shows a top deck with the number "2000" in the center of the top deck, which is a flat area that slopes downwards towards the City/County boundary line. (See attached Exhibit E-4B.)

The proposed grading in the JTD amendment shows an ultimate buildout of the Combined City/County landfill which does not exceed 2,000 MSL on the City portion of the landfill. The Q Conditions further state that the restrictions on the landfill only apply to the "final fill elevation" and this 2,000 MSL elevation refers only to the maximum vertical limit of waste disposal.

This is also consistent with the landfill Solid Waste Facilities Permit, which allows a maximum elevation of 2,004 ft. (MSL) on portions of the Combined City/County landfill within the City of Los Angeles boundary.

Use of Envirocover on Weekends.

SCL will modify the proposed language for the 48-hour use of Envirocover, which will seek to clarify that all uses of ADC must also adhere to the applicable regulatory requirements outside of the Local Enforcement Agency. The modified application with the updated language will be resubmitted to the LEA for review.

Termination Date of County Landfill Operations.

The date listed on the application of the JTD for termination of disposal operations in the County jurisdiction was incorrectly listed as 2038; this was a typographical error. It is understood the termination date stated in the County CUP is 2037. The date will be corrected and resubmitted to the LEA for review.

Should you have any additional concerns, please do not hesitate to bring them directly to our attention.

Thank you,

Kate Downey
Team Environmental Manager, Sunshine Canyon Landfill

Attachments:

- Copy of the Revised Exhibit A-2
- Copy of the Exhibit E-4B



Los Angeles County
Department of Regional Planning

DO NOT REMOVE



Approved by Maria Masis

Date: 4/18/2013

Handwritten initials: MM

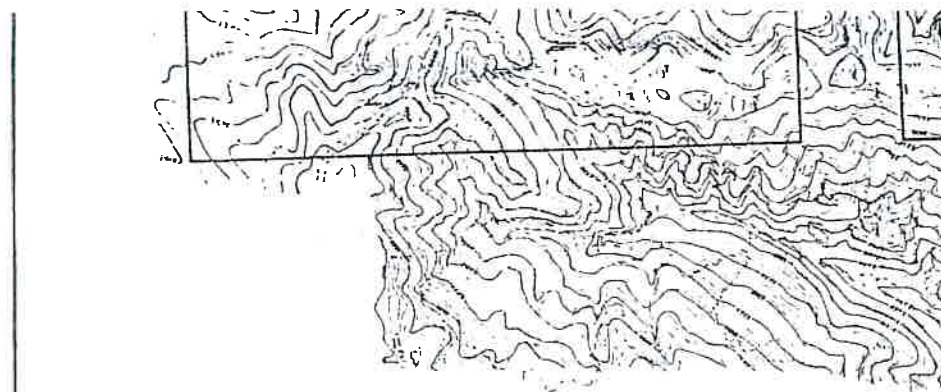
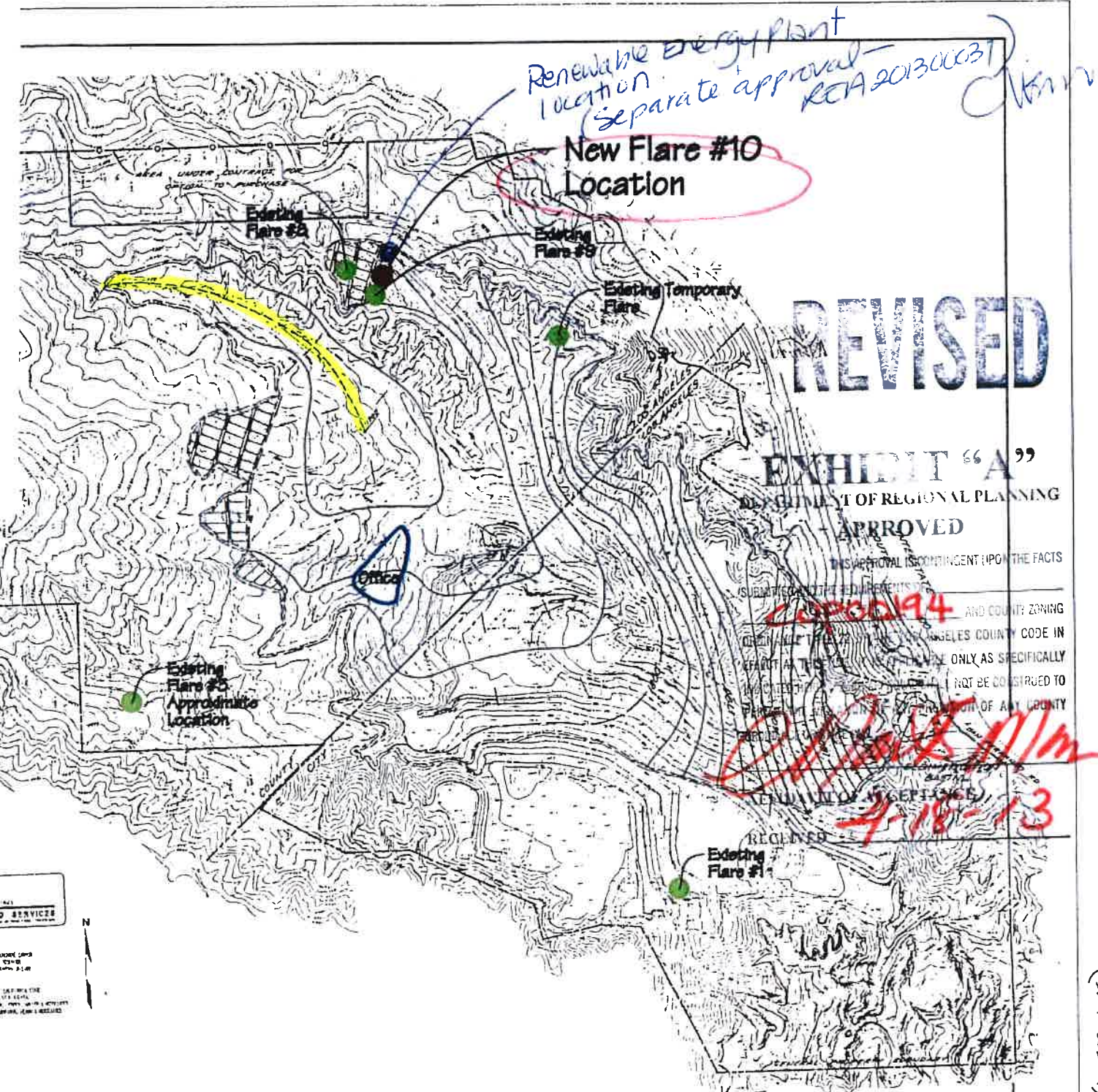
Project No: 00-194-(5), REA 201300076

Address: 14747 San Fernando Road, Sunshine Canyon Landfill

This Revised Exhibit "A" (REA) approves the following changes to the Exhibit "A" for the above referenced project:

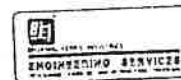
- Installation of new permanent flare #10.

This REA is found to be in substantial compliance with the terms and conditions of Conditional Use Permit 00-194. All permit conditions remain in effect and are not altered by this revision.



WESTERN PORTION OF SITE 22 COMPILED FROM A USGS QUADRANGLE

LEGEND
Proposed slope
Proposed 30 foot wide bench and drain
County/City boundary line
General property boundary
Property boundary under option to purchase
Combined surface flow (paved ditches)



LOCAL SET BACK, DRAINAGE, EROSION CONTROL, AND OTHER SPECIAL REQUIREMENTS SHALL BE DETERMINED BY THE LOCAL AGENCIES.

EXISTING FLARES					
EXISTING OFFICE AREA					
1	2-1-91	=	REVISED FROM E.I.R. SEQUENCE 2, CHG. 3a	R.J.	D.A.
NO.	DATE	ZONE	DESCRIPTION	DRAWN	APPROVED
REVISIONS					

EXHIBIT "A"

ALTERNATE

DATE: FEBRUARY 1991	The PRA Group, Inc.		2000 Technology Drive	San Diego, CA 92108
JOB NO. E-02-93	CONSULTING ENGINEERS		San Diego, CA 92108	Phone: (619) 591-1111
DESIGN: R.J.	E.I.R. - SEQUENCE 2, DRAWING 3a		FIGURE NO. 3a	
DRAWN: R.J.	BROWNING-FERRIS INDUSTRIES		LOS ANGELES COUNTY, CALIFORNIA	
CHG: D.A.	REVISIONS			
APP: R.J.	REV. 1			

As Approved

Richard J. Gray

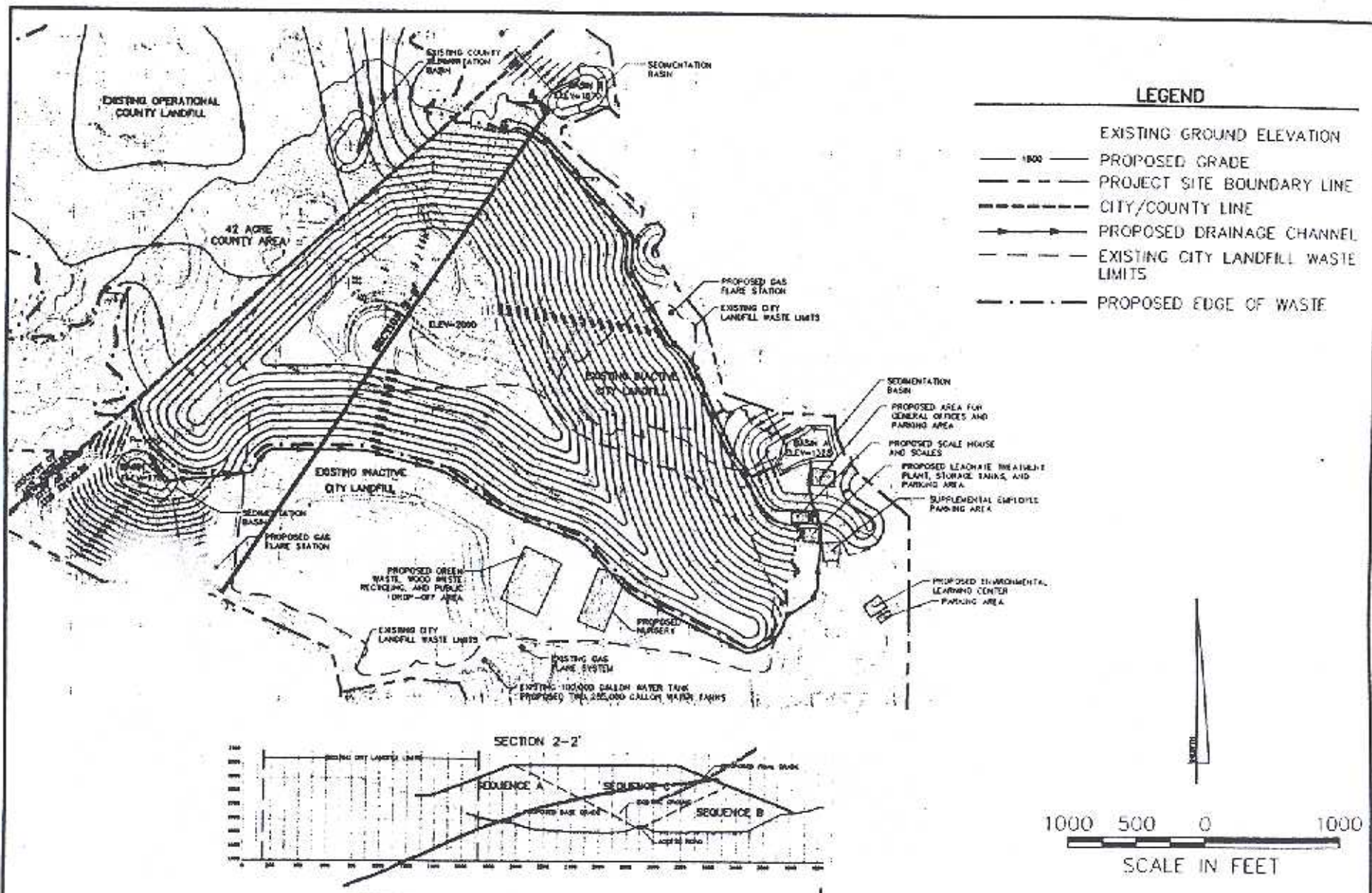
A-MEHR, INC.	
Sunshine Canyon Landfill	
New Flare #10 Pad Location	

Exhibit A-2
DEPT. OF REGIONAL PLANNING
APPROVED
1/9/07

DRP
FILE COPY

BFI
Sunshine Canyon Landfill
Replacement Conditional Use Permit 00-194-(5)

EXHIBIT A (ALTERNATE)



GEOSYNTEC CONSULTANTS

DISPOSAL AREA SEQUENCING SECTION 2-2
FINAL ELEVATIONS
SUNSHINE CANYON CITY/COUNTY LANDFILL
SYLMAR, CALIFORNIA

FIGURE NO.

DATE:

15 JUNE 1998