COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

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GAIL FARBER, Director

ADDRESS ALL CORRESPONDENCE TO:
P.O. BOX 1460
ALHAMBRA, CALIFORNIA 91802-1460

September 27, 2010

IN REPLY PLEASE REFER TO FILE EP-5

Mr. Kurt Bratton
Vice President
Republic Services, Inc.
Sunshine Canyon Landfill
14747 San Fernando Road
Sylmar, CA 91342-1021

Dear Mr. Bratton:

ODOR NUISANCE AT SUNSHINE CANYON LANDFILL
CONDITIONAL USE PERMIT NO. 00-194(5)

Based on information received by this Department and provisions established in Condition No. 45.N of the Sunshine Canyon Landfill (Landfill) Conditional Use Permit (CUP), we are hereby requiring Republic Services, Inc./Browning-Ferris Industries (Republic) to implement additional corrective measures to reduce the odor nuisance resulting from activities related to the operations of the Landfill.

Background

Since late 2009, residents living in the vicinity of the Landfill and staff/students from the nearby Van Gogh Elementary School have filed numerous complaints alleging odors from activities and operations occurring at the Landfill. According to Republic's Quarterly Dust and Odor Complaint Reports and Monthly Reports to the Sunshine Canyon Landfill - Local Enforcement Agency (SCL-LEA), as well as the Order for Abatement issued by the South Coast Air Quality Management District (AQMD) Hearing Board on March 24, 2010, more than 300 complaints were filed in 2009, of which more than half occurred during the month of November. The complaints continued into the first two months of 2010 totaling more than 160 complaints. These complaints resulted in numerous Notices of Violations issued by the AQMD to Republic for creating a Public Nuisance, the highest being five (5) Notices issued in November 2009.

As required by the Order for Abatement and in an attempt to relieve the impacts on the nearby residents, Republic implemented various corrective actions. Conditions pursuant to the Order included: restricting the size of the working face; reducing the amount of trash delivered by transfer stations on Monday mornings; and utilizing misting and odor control systems at the working face.

Other mitigation measures being undertaken include developing study proposals regarding daily cover materials and landfill gas emissions controls, and a plan to augment the vegetation in the southern areas of the Landfill.

Findings and Determination

While we recognize Republic's efforts to comply with AQMD's Order for Abatement, we have determined that additional corrective measures are necessary at this time to further reduce odors related to operations at the working face which is identified in the Order for Abatement as a potential odor contributor. Our determination is based on:

- the frequency and duration of the odor complaints from the surrounding community
- public testimony received by AQMD's Hearing Board during the Order for Abatement proceedings
- consultation with the SCL-LEA, AQMD, and the County Department of Regional Planning
- information contained in Republic's draft Working Face and DustBoss Study Proposal, dated July 28, 2010
- Public Works' physical inspections of the site and surrounding areas

Republic's current practice of removing nearly six inches of soil cover on Monday mornings and leaving approximately three inches of cover remaining on the working face is inconsistent with established sound engineering practice, and a key contributing factor to the odor conditions. This practice compromises the integrity of the soil cover thereby significantly contributing to an odor nuisance and posing a risk to public health and safety.

Additionally, Republic's practice of using tarps as daily cover, from Monday through Friday, on the advancing side of the working face deviates from the standard application of compacted soil as daily cover, which has been proven to be effective in controlling odor and other nuisances. Furthermore, using soil as an odor reduction measure is consistent with the City of Los Angeles' Mitigation Reporting and Monitoring Program, dated February 25, 1999, which provides for the application of additional dirt as daily cover material to mitigate odor impacts (see enclosed Section 4.2.13, No. 33, page 7). The mitigation measure is also consistent with the certified Subsequent Environmental Impact Report for the project.

Corrective Measures

Therefore, pursuant to CUP Condition No. 45.N, Republic is required to implement the following corrective measures within 30 days of the date of this letter:

1. Terminate the use of any alternative materials as daily cover other than compacted soil.

2. Cover disposed solid waste with a minimum of nine inches of compacted soil at the end of every operating day, Monday through Saturday, and at more frequent intervals as necessary, to control vectors, fires, odors, blowing litter, and scavenging. Tarp may only be used to enhance the control of vectors or other nuisance, but may not replace the use of soil.

3. Discontinue the practice of removing compacted soil cover at the beginning of an operating day. The compacted soil cover applied at the end of the previous operating day must be kept in-place.

4. Submit to Public Works for review and approval an Odor Mitigation Plan that incorporates the following elements at a minimum:

    a. Identify and provide status on the measures currently being implemented as required by the AQMD's Order for Abatement

    b. A program for managing odoriferous loads currently received at the Landfill, which would include the following at a minimum:

        - Provide a trained technician to identify odiferous loads.
        - Immediately bury odiferous waste loads at the working face within one hour of its arrival.
        - Develop a program to minimize odors from transfer trucks and direct haul loads.

    c. An odor patrol program, which would include the following at a minimum:

        - Provide a trained technician to conduct odor patrols in the surrounding neighborhoods at a frequency of one patrol per hour from 6 a.m. to 10 a.m., Monday through Saturday, and during adverse wind conditions[1].

1 As defined in AQMD's Order for Abatement dated March 24, 2010, Adverse Wind Conditions mean either: 1) wind speed measured at the existing monitor at the southern berm from all directions as less than 2 mph; or, 2) wind speed measured at the same monitor coming from the north/northeast direction from between 320 degrees and 15 degrees at less than 15 mph. Wind speed is based on measured winds from three continuous one-hour averaging periods commencing at 3 a.m. Any hour in which there is measurable precipitation will not be classified as an adverse wind condition, in that precipitation generally suppresses odors at landfills.

- If odor is detected, identify its potential and/or actual source, including those that may not be related to the Landfill's operation, such as an odorous trash dumpster or transfer trucks.
- If odor is determined to be related to the Landfill's operation, take immediate action to reduce the odor. Document the streets patrolled on a map, time of the patrol, potential source of odor, and immediate actions taken by the Landfill.

d. A landfill gas mitigation plan in preparation for the next rainy season since landfill gas emissions from either the landfill surface or landfill gas control equipment is cited as a potential contributor in the AQMD's Order for Abatement. The plan should include the following at a minimum:

- Description of the site's current Gas Monitoring and Control Plan, including a map showing locations of gas monitoring probes, gas extraction wells, horizontal and vertical gas collection lines, etc.
- Compliance history of the site's landfill gas migration control program from January 1, 2009, to the present quarter as well as any corrective actions.
- Discuss the impacts of the most recent heavy rains on the landfill gas collection system, including identifying locations of damage due to soil erosion, as well as any corrective actions or mitigation measures.
- A work plan that includes preventive measures, such as identifying and filling any surface cracks and installing additional extraction wells, as well as contingency measures.
- An implementation schedule for the above work plan.

5. Include in the Quarterly Dust and Odor Reports, which are required by CUP Condition No. 45.N, the status and effectiveness of mitigation measures 1 through 3 above, and the Odor Mitigation Plan.

6. The corrective measures described above shall not be modified or terminated without prior written approval of the Director of Public Works.

Failure by Republic to implement these corrective measures shall constitute a violation of the CUP and be subject to the penalty provision described in Condition No. 11 of the CUP.

If you have any questions, please contact Mr. Martins Aiyetiwa of this office at (626) 458-3553, Monday through Thursday, 7 a.m. to 5:30 p.m.

Very truly yours,

GAIL FARBER
Director of Public Works

PAT PROANO
Assistant Deputy Director
Environmental Programs Division

LL:dy
P:\sec\Sunshine Canyon Landfill CUP

Enc.

cc: South Coast Air Quality Management District (Edwin Pupka, David Jones)
Department of Regional Planning (Richard Bruckner, Maria Masis, Bruce Durbin)
Department of Public Health (Cindy Chen, Gerry Villalobos)
Sunshine Canyon Landfill Technical Advisory Committee (Richard Bruckner, Michael LoGrande)
City of Los Angeles Department of City Planning (Michael LoGrande, Ly Lam)
Sunshine Canyon Landfill - Local Enforcement Agency (Program Manager)
Members of the Los Angeles County Solid Waste Management Committee/ Integrated Waste Management Task Force
Sunshine Canyon Landfill - Community Advisory Committee (Becky Bendikson, Wayde Hunter)

MITIGATION REPORTING AND MONITORING PROGRAM (MRMP)
SUNSHINE CANYON LANDFILL - CITY OF LOS ANGELES
INCORPORATED AS CONDITIONS OF APPROVAL PURSUANT TO [Q] CONDITION NO. A.7

(Based on Table 7.4-1 (Revised 2/11/99, 10/20/99, 10/26/99) Final SEIR 91-0377-ZC/GPA)

Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
4.1 EARTH RESOURCES			
4.1.1 Grading Activities			
1. All grading activities shall be performed in accordance with the provisions of Division 70 of the City of Los Angeles Building Regulations, CCR Title 14, and with the rules and regulations as established by the City Department of Building and Safety.	Project Proponent	Throughout landfill operations and on an on-going basis.	Monitoring Agency: LARWQCB, CIWMB, City LEA, City B&S, and City BOE Enforcement Agency: LARWQCB, CIWMB, City B&S, City LEA, and City BOE
2. Areas outside of and above the cut and fill as shown on the conceptual grading plan shall not be graded, except for the development of ancillary facilities or other related improvements. Additional grading may be necessary for slope stability or drainage purposes. Prior to undertaking any grading activities, the Department of Building and Safety shall be notified and approve any additional grading based on engineering studies (in accordance with CCR Title 14) provided by the project proponent and independently evaluated by the Department of Building and Safety.	Project Proponent	Throughout landfill operations and on an on-going basis.	Monitoring Agency: LARWQCB, CIWMB, City LEA, and City B&S Enforcement Agency: LARWQCB, CIWMB, City B&S, City LEA, and City BOE
3. During excavation, any unsuitable material encountered below the base grade for the landfill, including alluvium, organic material, and landslide debris, shall be removed. Engineered compacted fill shall be placed in those areas to restore the base grade for liner system construction. Excess material not used immediately for cover material shall be stockpiled onsite for future use. The unsuitable material shall be excavated, a portion at a time, as the working area of the landfill progresses to avoid opening large sections of potentially unstable material. A buffer area (i.e., 50-100 horizontal feet or as deemed appropriate to maintain safe working conditions) shall be used between the active cells receiving waste and areas under excavation. In accordance with CCR Title 14 a certified engineering geologist shall delineate the limits of the unsuitable material and associated "backcuts" to facilitate removals during excavation. Removal shall not occur during the rainy season (October 1 - April 30) or when the ground is saturated unless performed under the direction and specifications of a certified engineering geologist.	Project Proponent	Throughout landfill operations and on an on-going basis.	Monitoring Agency: LARWQCB, CIWMB, City LEA, City B&S, and City BOE Enforcement Agency: LARWQCB, CIWMB, City B&S, City LEA, and City BOE
4. Grading that allows for construction of ancillary facilities outside of the landfill footprint or that has the potential to impact property beyond the boundary of the landfill shall be approved by the Department of Building and Safety.	Project Proponent	Throughout landfill operations and on an on-going basis.	Monitoring Agency: LARWQCB, CIWMB, and City B&S Enforcement Agency: LARWQCB, CIWMB, and City B&S
5. All grading activities shall be in compliance with specific requirements provided in a comprehensive geotechnical report prepared specifically for the proposed project, including provisions for excavation approved by the Department of Building and Safety, City Engineer, City LEA and other Responsible Agencies.	Project Proponent	Throughout landfill operations and on an on-going basis.	Monitoring Agency: LARWQCB, CIWMB, City LEA, City B&S, and City BOE Enforcement Agency: LARWQCB, CIWMB, City B&S, City LEA, and City BOE

Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
6. Revegetation and erosion control procedures on all exposed slopes shall be implemented. The erosion controls to be implemented at the site shall include soil stabilization measures and revegetation in accordance with the approved revegetation plan as approved by the City Building and Safety Department. Interceptor ditches shall be designed to divert storm runoff to a sedimentation basin.	Project Proponent	Throughout landfill operations and on an on-going basis.	Monitoring Agency: LARWQCB, CIWMB, and City LEA ,and City B&S Enforcement Agency: LARWQCB, CIWMB, and City LEA, and City B&S
7. Prior to the initiation of grading activities, the project proponent shall undertake, if necessary, reabandonment procedures as required by the California Department of Conservation, Division of Oil, Gas, and Geothermal Resources.	Project Proponent	Throughout landfill operations and on an on-going basis.	Monitoring Agency: California Dept. of Conservation Enforcement Agency: California Dept. of Conservation
4.1.2 Geologic Hazards - Mudflow and Landslide (including lithologic history)			
8. When excavating for the landfill operation, if a landslide is encountered, all material constituting that landslide shall be removed. Excess landslide material not used immediately for cover material shall be stockpiled onsite for future use. If necessary, the landslide area shall be excavated a portion at a time to avoid opening large sections of potentially unstable material. A buffer area shall be maintained between the active landfill cells receiving waste and areas under excavation to remove overburden soils, landslide debris, and weathered bedrock. A qualified geologist shall delineate the limits of the landslide during excavation. Landslide removal shall not commence when the ground is saturated, unless removed under the direction and specifications of a certified engineering geologist.	Project Proponent	Throughout landfill operations and on an on-going basis.	Monitoring Agency: LARWQCB, CIWMB, City B&S, and City BOE Enforcement Agency: LARWQCB, CIWMB, City B&S, and City BOE
9. Areas of excavation and areas of loose soil (i.e., around haul roads, etc.) shall be stabilized to prevent erosion before the onset of the rainy season.	Project Proponent	Throughout landfill operations and on an on-going basis.	Monitoring Agency: LARWQCB, CIWMB, City LEA, City B&S, and City BOE Enforcement Agency: LARWQCB, CIWMB, City LEA, City B&S, and City BOE
4.1.3 Geologic Hazards - Subsidence			
Refer to Section 4.1.2, Geologic Hazards - Mudflow and Landslide.			
4.1.4 Geologic Hazards - Seismicity			
10. The landfill facility shall be designed and constructed to meet CCR, Title 14, Division 7, Chapter 3, Article 7.8, § 17777 (Final Site Face) and CCR, Title 23, Division 3, Chapter 15, Article 4, § 2547 (Seismic Design) requirements "to withstand the maximum probable earthquake without damage to the foundations or to the structures which control leachate, surface drainage, erosion, or gas." Design consideration shall include strong ground shaking and secondary ground rupture. In addition, the project proponent shall comply with RCRA, Subtitle D, 40 CFR Part 258, Subpart B, § 258.13 (Fault Areas) which states "new municipal solid waste landfill units and lateral expansions shall not be located within 200 feet (60 meters) of a fault that has had displacement in Holocene time . . ." The landfill design and seismic analysis will be reviewed by the RWQCB.	Project Proponent	Prior to commencement of landfill development.	Monitoring Agency: LARWQCB, CIWMB, City LEA, City B&S, and City BOE Enforcement Agency: LARWQCB, CIWMB, City B&S, City LEA, and City BOE
11. An operations checklist shall be used by a registered engineering geologist for surveys following all earthquake events measuring 5.0 on the Richter Scale or greater near the project site. A comparison of operating parameters and site conditions before and after major earthquake events shall be made to verify that systems are operational as designed. Final designs for major engineered	Project Proponent	After earthquake events of 5.0 magnitude or greater.	Monitoring Agency: SCAQMD, LARWQCB, CIWMB, City B&S, and City BOE Enforcement Agency: SCAQMD, LARWQCB, CIWMB, City B&S, and City

Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
structures shall be based on the results of the detailed stability analyses of potential seismic events.			BOE
4.1.5 Geologic Hazards - Liquefaction			
12. Alluvium in the canyon bottoms beneath the footprint of the waste containment system and beneath ancillary structures shall be excavated and, if necessary, replaced with compacted structural fill during construction. A qualified geologist shall be onsite during construction activities to observe removal and replacement of alluvium and verify that all alluvium within the landfill footprint has been removed prior to placement of any compacted fill or construction of any containment system elements.	Project Proponent	Prior to commencement of landfill development.	Monitoring Agency: LARWQCB, CIWMB, City B&S, and City BOE Enforcement Agency: LARWQCB, CIWMB, City B&S, and City BOE
13. The landfill facility shall be designed and constructed in accordance with RCRA, Subtitle D, 40 CFR, Part 258, Subpart B, § 258.14 (Unstable Areas) so that there would be no liquefaction related impacts.	Project Proponent	Prior to commencement of landfill development.	Monitoring Agency: LARWQCB, CIWMB, City B&S, and City BOE Enforcement Agency: LARWQCB, CIWMB, City B&S, and City BOE
14. The landfill facility shall be designed and constructed in accordance with CCR, Title 23, Division 3, Chapter 15, Article 3, § 2530(d) (Classification and Siting Criteria), which requires that "all containment structures at waste management units shall have a foundation or base capable of providing support for the structures and capable of withstanding hydraulic pressure gradients to prevent failure due to settlement, compression, or uplift as certified by a registered civil engineer or certified engineering geologist."	Project Proponent	Prior to commencement of landfill development.	Monitoring Agency: LARWQCB, CIWMB, City LEA, City B&S, and City BOE Enforcement Agency: LARWQCB, CIWMB, City B&S, and City BOE
4.1.6 Geologic Hazards - Slope Stability			
15. Final maximum refuse slope gradient at the site shall be no steeper than 2H:1V (horizontal to vertical) for the landfill.	Project Proponent	Prior to commencement of landfill development.	Monitoring Agency: LARWQCB, CIWMB, City LEA, City B&S, and City BOE Enforcement Agency: LARWQCB, CIWMB, City LEA, City B&S, and City BOE
16. Final cut and fill slopes shall have an overall slope gradient no steeper than 1.5H:1V.	Project Proponent	Prior to commencement of landfill development.	Monitoring Agency: LARWQCB, CIWMB, City LEA, City B&S, and City BOE Enforcement Agency: LARWQCB, CIWMB, City LEA, City B&S, and City BOE
17. Final slopes shall be engineered to have a static factor of safety of at least 1.5.	Project Proponent	Prior to commencement of landfill development.	Monitoring Agency: LARWQCB, CIWMB, City LEA, City B&S, and City BOE Enforcement Agency: LARWQCB, CIWMB, City LEA, City B&S, and City BOE
18. Survey monuments shall be installed around the perimeters of the outer fill areas at points where they would not be subject to disturbance by landfill development and marking the 500 foot setback from the more restrictive zone. The exact spacing, location, and characteristics of the survey monuments shall be submitted to and approved by the City Local Enforcement Agency (LEA).	Project Proponent	Prior to commencement of landfill development.	Monitoring Agency: LARWQCB, CIWMB, City LEA, and City BOE Enforcement Agency: LARWQCB, CIWMB, City LEA, and City BOE
4.2 AIR QUALITY			
4.2.1 Existing Conditions			
Refer to Section 4.2.11, Construction, within this table.			

Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
4.2.2 California's SCAB Regional Climatic Characteristics Refer to Section 4.2.11, Construction, within this table.			
4.2.3 Criteria Air Pollutants Refer to Section 4.2.11, Construction, within this table.			
4.2.4 Ambient Air Quality Standards and Annual Statistics Refer to Section 4.2.11, Construction, within this table.			
4.2.5 Air Quality Management Plan Refer to Section 4.2.11, Construction, within this table.			
4.2.6 Proposed Project Overview Refer to Section 4.2.11, Construction, within this table.			
4.2.7 Site Preparation/Construction Phase Refer to Section 4.2.11, Construction, within this table.			
4.2.8 Air Quality Operational Phase (Long-Term) No mitigation measures would be required.			
4.2.9 Health Risk Analysis Refer to Section 4.2. 12, Operations, within this table.			
4.2.10 Project Consistency with Applicable Plans Refer to Section 4.2. 12, Operations, within this table.			
4.2.11 Construction			
19. The following mitigation measures will reduce emissions to the maximum extent reasonably feasible. a. The project proponent will maintain equipment in tune per manufacturer's specifications. b. The project proponent will use catalytic converters on gasoline-powered equipment. c. The project proponent will retard diesel engine injection timing by 2 degrees. d. High-pressure fuel injectors will be installed. e. Heavy equipment will use reformulated, low-emission diesel fuel. f. The project proponent will substitute electric and gasoline-powered equipment for diesel-powered equipment where feasible. g. Where applicable, equipment will not be left idling for prolonged periods. h. The project proponent will curtail (cease or reduce) construction during periods of high ambient pollutant concentrations (i.e., Stage II smog alerts).	Project Proponent	During project construction.	Monitoring Agency: City B&S Enforcement Agency: City B&S Monitoring Agency: SCAQMD Enforcement Agency: SCAQMD
20. Daily watering of active construction areas, active soil stockpiles, and all traveled unpaved roads shall be performed to minimize dust lofting from construction disturbances. Construction areas will also receive a soil stabilization (sealant) product if they are to be left unattended for periods in excess of 5 days and	Project Proponent	During project construction.	Monitoring Agency: SCAQMD and City LEA Enforcement Agency: SCAQMD

Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
control is required.			
21. Wind speed shall be continually monitored using onsite anemometers. Excavation within construction areas shall be halted when the 15-minute average wind speed exceeds 15 mph or when the instantaneous wind speed exceeds 25 mph.	Project Proponent	During project construction.	Monitoring Agency: SCAQMD Enforcement Agency: SCAQMD
22. Graded areas shall be watered as necessary to reduce dust emissions.	Project Proponent	During project construction.	Monitoring Agency: SCAQMD and City LEA Enforcement Agency: SCAQMD
23. Disturbed areas shall be revegetated with an interim ground cover as specified in the proposed revegetation program. Excavation will proceed in a manner to reduce the amount of graded areas at any given time.	Project Proponent	During project construction.	Monitoring Agency: SCAQMD Enforcement Agency: SCAQMD
4.2.12 Operations			
24. <u>Construction Equipment</u> a. The project proponent will maintain equipment in tune per manufacturer's specifications. b. The project proponent will use catalytic converters on gasoline-powered equipment. c. The project proponent will retard diesel engine injection timing by 2 degrees. d. High-pressure fuel injectors will be installed. e. Heavy equipment will use reformulated, low-emission diesel fuel. f. The project proponent will substitute electric and gasoline-powered equipment for diesel-powered equipment where feasible. g. Where applicable, equipment will not be left idling for prolonged periods.	Project Proponent	Throughout landfill operations.	Monitoring Agency: City B&S Enforcement Agency: City B&S
h. The project proponent will curtail (cease or reduce) construction during periods of high ambient pollutant concentrations (i.e., Stage II smog alerts).	Project Proponent	Throughout landfill operations.	Monitoring Agency: SCAQMD Enforcement Agency: SCAQMD
25. <u>Refuse Trucks</u> The following measures will be applied to the project proponent's operated trucks that utilize the project site. a. Refuse trucks shall be maintained in proper tune. Trucks observed to emit excessive amounts of smoke (particulate matter) shall either be tuned up or repaired, as applicable.	Project Proponent	Throughout landfill operations.	Monitoring Agency: City B&S Enforcement Agency: City B&S
b. Where applicable, high-pressure fuel injector nozzles shall be used, and diesel engine timing shall be retarded by 2 degrees.	Project Proponent	Throughout landfill operations.	Monitoring Agency: City B&S Enforcement Agency: City B&S
c. Using a progressive fee schedule, the project proponent shall encourage trucks to carry full loads.	Project Proponent	Throughout landfill operations.	Monitoring Agency: City B&S Enforcement Agency: City B&S
d. The project proponent shall encourage trucking to be performed during off-peak hours. This shall be accomplished through coordination of deliveries with the transfer stations that supply refuse, restrictions in the hours of operation, and/or a fee schedule that penalizes haul trucks arriving during peak congestion periods. This will reduce emissions by increasing truck speeds and eliminating prolonged idling in traffic.	Project Proponent	Throughout landfill operations.	Monitoring Agency: City B&S Enforcement Agency: City B&S

Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
e. When operating onsite, trucks shall not be left idling for periods in excess of 5 minutes.	Project Proponent	Throughout landfill operations.	Monitoring Agency: City B&S Enforcement Agency: City B&S
f. Private owner-operators shall be warned that, if their trucks emit excessive amounts of smoke as determined by scale house workers, they will not be allowed future access to the landfill facility.	Project Proponent	Throughout landfill operations.	Monitoring Agency: City B&S Enforcement Agency: City B&S
26. Truck Travel and Fugitive Dust Emissions			
a. To minimize fugitive dust emissions, the access roadways shall be paved, as necessary, and haul roads to the working face areas shall be hard packed and or covered with a crushed stone layer. Paved and/or crushed stone roadways shall extend up to new active fill areas as development of the landfill progresses.	Project Proponent	Throughout landfill operations.	Monitoring Agency: SCAQMD Enforcement Agency: SCAQMD
b. Curbs and gutters shall be used. At least twice daily watering or wet sweeping of paved roads to remove windblown surface dust shall occur. AP-42 assigns a control efficiency of 50 percent for twice weekly cleaning of industrial paved roads. With twice daily cleaning, a control efficiency in excess of 90 percent is predicted.	Project Proponent	Throughout landfill operations.	Monitoring Agency: SCAQMD Enforcement Agency: SCAQMD
c. For unpaved clay roads, mitigation shall include an SCAQMD-approved chemical dust suppressant with a manufacturer's demonstrated control efficiency in excess of 90 percent shall be regularly applied to inactive areas, during windy periods. Note that this control efficient is less than (i.e., more conservative than) the 95-percent value used at the El Sobrante Landfill.(*Draft South Coast Air Quality Management District Consultation No. 4, Work in Progress Air Quality Analysis Refinements, El Sobrante Landfill Expansion*, TRC Environmental Solutions, Inc., May 2, 1997).	Project Proponent	Throughout landfill operations.	Monitoring Agency: SCAQMD Enforcement Agency: SCAQMD
d. For unpaved crushed stone covered roads, mitigation shall include the use of a crushed stone topcoat in addition to the regular application of a SCAQMD-approved chemical dust suppressant and subsequent watering, a control efficiency in excess of 95 percent is predicted.	Project Proponent	Throughout landfill operations.	Monitoring Agency: Project Site Manager and SCAQMD, Enforcement Agency: SCAQMD and
27. Heavy Equipment Operations			
a. Operations shall be restricted to encompass no more than a 10-acre active working face area.	Project Proponent	Throughout landfill operations.	Monitoring Agency: SCAQMD Enforcement Agency: SCAQMD
b. The disturbed area (subject to the surface erosion) shall be reduced from 40 acres to 20 acres when operations occur south of the smaller former filling area of the existing inactive City Landfill.	Project Proponent	Throughout landfill operations.	Monitoring Agency: SCAQMD Enforcement Agency: SCAQMD
28. Site Erosion			
a. To the extent technically feasible, material excavated from one portion of the project site shall be used as daily cover material in an adjacent area to minimize travel distances for such cover material.	Project Proponent	Throughout landfill operations.	Monitoring Agency: SCAQMD Enforcement Agency: SCAQMD
b. Subject to approval by the California Integrated Waste Management Board (CIWMB), filling in each active area shall be prolonged through the utilization of a 20-foot maximum cell height. This would reduce the area of excavation and minimize the disturbances to the landfill, thereby	Project Proponent	Throughout landfill operations.	Monitoring Agency: CIWMB and City LEA Enforcement Agency: CIWMB and City LEA

Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
providing an effective control of fugitive dust.			
c. A temporary vegetation cover shall be established on all slopes that are to remain inactive for a period longer than 180 days.	Project Proponent	Throughout landfill operations.	Monitoring Agency: SCAQMD Enforcement Agency: SCAQMD
d. An SCAQMD approved soil stabilization (sealant) product shall be used to retard soil erosion and enhance revegetation. Soil sealant shall be applied when necessary to selected working areas of the landfill. The sealant will also be used as a binder or tackifier to hold seed during revegetation, mulch, and fertilizers in-place until grasses become established and stabilize on the landfill surface.	Project Proponent	Throughout landfill operations.	Monitoring Agency: SCAQMD Enforcement Agency: SCAQMD
4.2.13 Odor Impacts			
29. The natural biological processes that generate odors in a landfill through anaerobic decomposition cannot be prevented or avoided. However, the LFGs shall be prevented from escaping to the atmosphere through the use of control measures. These measures include using daily and intermediate cover material over deposited wastes, filling any surface cracks with clean dirt as necessary, and extracting LFG through the use of an LFG collection and recovery system and destroying collected gases by combustion.	Project Proponent	Throughout landfill operations.	Monitoring Agency: SCAQMD and City LEA Enforcement Agency: SCAQMD and City LEA
30. Operational techniques shall be utilized to control odor sources at the landfill. The size of the working face shall be limited so that the area of waste exposed to the atmosphere is kept to a minimum.	Project Proponent	Throughout landfill operations.	Monitoring Agency: SCAQMD and City LEA Enforcement Agency: SCAQMD and City LEA
31. Solid waste shall be compacted within 1 hour of its arrival at the working face.	Project Proponent	Throughout landfill operations.	Monitoring Agency: City LEA Enforcement Agency: City LEA
32. The LFG collection and recovery system shall be installed in phases as each portion of the landfill site is filled. The final system shall contain a network of gas extraction wells, collection system piping, and flaring facilities. Because the LFG generation begins at lower levels of volume and increases during the landfill site life, the gas will be flared initially until sufficient quantities are available for processing into electricity.	Project Proponent	Throughout landfill operations.	Monitoring Agency: SCAQMD and City LEA Enforcement Agency: SCAQMD and City LEA
33. If an odor problem should develop, appropriate control measures shall be implemented. These measures include the application of additional dirt daily cover material or more frequent application of the cover material to seal the landfill surface, or adjustments to the wells, equipment, and operation of the LFG collection and recovery system.	Project Proponent	Throughout landfill operations.	Monitoring Agency: SCAQMD, and City LEA Enforcement Agency: SCAQMD and City LEA
34. To ensure that odors are kept to a minimum, the following odor/LFG monitoring program shall be implemented for the proposed landfill project. The monitoring program shall comply with the requirements of SCAQMD Rule 1150.1 and include: a. Sample Probe Installation: One monitoring probe per 1,000 feet or as identified by South Coast Air Quality Management District (SCAQMD) and/or Local Enforcement Agency (LEA))in the landfill expansion, and one probe per 650 feet or as identified by SCAQMD and/or LEA in the City Inactive landfill along the landfill perimeter, or which ever is more restrictive shall be installed to identify potential areas of subsurface landfill gas (LFG) migration. These probes shall be monitored to ensure	Project Proponent	Throughout landfill operations.	Monitoring Agency: SCAQMD, and City LEA Enforcement Agency: SCAQMD and City LEA

Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
that quantities of LFG beyond regulatory standards do not vent offsite through subsurface soils. b. Integrated Landfill Surface Sampling: The landfill surface shall be monitored to ensure that the average concentration of total organic compounds over the landfill surface does not exceed SCAQMD's standard of 50 ppm. c. Ambient Air Samples: 24-hour integrated gas samples and required meteorological data shall be taken to assess any impact the landfill is having on the ambient air quality at the landfill perimeter. d. Instantaneous Landfill Surface Monitoring: Spot checks on the landfill sur face shall be made to determine the maximum concentration of total organic compounds measured as methane, measured at any one point on the surface of the landfill does not exceed the SCAQMD's standard of 500 ppm. e. Regular Monitoring and Annual Testing: LFG concentrations at perimeter probes, gas collection system headers, the landfill surface, and in ambient air downwind of the landfill shall be monitored once per month or less frequently (but no less than quarterly) as required by the SCAQMD. The LFG collection system shall be adjusted and improved based on quarterly monitoring data and annual stack testing results.			
35. Landfill gas flares shall be below the adjacent ridges (unless otherwise required by the South Coast Air Quality District). Flaring systems shall be sited as required by the SCAQMD and constructed using BACT. The flames shall be totally contained within the stack. Flame arresters shall be provided to the satisfaction of the City Building and Safety Department. To the extent technically and economically feasible, gas recovered at the landfill site shall be converted to energy or developed for other beneficial uses rather than flared.	Project Proponent	Throughout landfill operations.	Monitoring Agency: SCAQMD, and City B&S Enforcement Agency: SCAQMD and City B&S
4.3 SURFACE AND GROUNDWATER			
4.3.1 Surface Water			
36. To ensure that infiltration of surface water into the closed landfill cells is minimized, surface runoff shall be intercepted and diverted around the landfill. The method of diversion used at the project site shall include the use of lined interceptor ditches placed along the edges of the landfill areas. This system of ditches shall flow into monitored sedimentation basins. After sediment content has been reduced, surface waters shall flow into the existing flood control channel directly east of the project site entrance.	Project Proponent	Prior to commencement of landfill development.	Monitoring Agency: LARWQCB, CIWMB, City LEA, City B&S, and City BOE Enforcement Agency: LARWQCB, CIWMB, City LEA, City B&S, and City BOE
37. As development of the site proceeds, surface drainage systems shall be maintained so that surface runoff is diverted away from working slopes and isolated from landfilled refuse. Onsite drainage channels would be designed per CCR, Title 23, Division 3, Chapter 15, Article 3, § 2533(C), and County of Los Angeles Public Works Department, Flood Control Division requirements.	Project Proponent	Prior to commencement of landfill development.	Monitoring Agency: LARWQCB, CIWMB, City LEA, and City BOE Enforcement Agency: LARWQCB, CIWMB, City LEA, and City BOE
38. Permanent bench drainage ditches shall be installed when final cover is placed on completed portions of the landfill. These ditches shall be lined. Temporary unlined drainage facilities consisting of diversion ditches (V-ditches) where necessary shall directly intercept natural surface runoff . Any intermittent channel flow in the existing canyon bottom shall be captured, channelized, and conveyed into Sedimentation Basin A. Diversion ditches shall convey surface	Project Proponent	Throughout landfill operations.	Monitoring Agency: LARWQCB, CIWMB, City LEA, and City BOE Enforcement Agency: LARWQCB, CIWMB, City LEA, and City BOE