

**North Valley Coalition of Concerned Citizens Inc.,
16911 San Fernando Mission Blvd.,
Box 172
Granada Hills, CA 91344**

May 4, 2020

Ms. Dorcas Hanson-Lugo
SCL-LEA Program Manager

Local Enforcement Agency
5050 Commerce Drive, First Floor
Baldwin Park, CA 91706

Dear Madam:

Please be advised that we are in receipt of the included correspondence for Republic's request for an Emergency Waiver of Standards for the SCL Solid Waste Facility Permit based on a Governor Newsom's March 12, 2020, Emergency proclamation, and asking for the increase in daily tonnage from 12,100 tons per day to 14,100 tons per day, and an increase in operating hours from 6 a.m. to 9 p.m. (Mon. – Fri.) to 6 a.m. – 11 p.m. (Mon. – Sat.) at Sunshine Canyon Landfill dated April 20, 2020, and the SCL-LEA's April 27, 2020, subsequent approval of the same (attached).

Our concerns are as follows:

As you know, the LEA's authority is limited only to the facility's Solid Waste Facilities Permit and does not permit the facility owner/operator to institute said changes at this time. Pursuant to the facility's land use permit/CUP, Republic needs to get the County and the Los Angeles City Council approval for the increase in daily tonnages and the expanded operating hours. Republic would also be required to get the County's Integrated Waste Management Task Force concurrence for these changes pursuant to the facility's Finding of Conformance. Further, the approval of the South Coast Air Quality Management District (SCAQMD) is also required before the facility operator can proceed with the requested increase in landfill daily disposal tonnages.

We find that like the similar emergency orders that were issued after our recent wildfires involving Sunshine Canyon Landfill, that this is a rush to judgement with an apparent lack of concern for the health impacts to the community, not only from odors, but from the potential transmission of the COVID-19 virus which can live variously from a few hours to 9-days or longer (see excerpt from How Long Does the Corona Virus Live on Surfaces, WebMD attached), all carried to us by the prevailing winds and exacerbated by the proximity of the community to the landfill. Why might the community have concerns about what is coming to the landfill you may ask? Independent businesses and/or government agencies handling waste have all provided protections to their own workers either in the form of N95 masks, protective clothing, increased worker spacing, reduced working hours, and additional cleaning just to name a few. COVID-19 contaminated waste should be treated as an infectious waste, and either autoclaved or bagged with bleach in order to prevent further exposure. Our concerns and the failure of the City or the County to step up and address this problem can be found in my email to Eugene Tseng on March 28, 2020 (attached) when commenting on a proposed instruction sheet for the public to properly

handle waste, that was being prepared by CSUN. Needless to say, my suggestions were not incorporated, and the public continues to improperly dispose of contaminated waste.

In making the request, Republic did not submit any supporting data for the increase. We are not aware of any empirical data that has been published for California that would indicate that there has been an increase in the amount of disposed volumes due to COVID-19, however, any increase in residential and recycle disposal is most probably offset by a reduction in commercial disposal such as reported in Waste Dive, May 1, 2020, excerpt under the title “How coronavirus is disrupting US waste and recycling” which states that: *Connecticut service providers report similar volume trends to those being seen around the country. USA Hauling & Recycling, a large regional hauler, reported residential volumes have been up by 15% in the past six weeks. At the same time, commercial volumes are down by 30%. (Hartford Courant)*. Entire article can be found at: <https://www.wastedive.com/news/coronavirus-us-waste-recycling-disruption-tracker/574324/>

From Republic’s Finding of Conformance Report to the County Integrated Waste Management Task Force for the 1st Quarter 2020, dated April 16, 2020, (attached) and by using February and March which would be more representative of “shelter in place”, the average daily tonnage is approximately 9,000 tpd Monday thru Friday and about 3,250 tpd on a Saturday or 43,250 tons per week average. The approval given by the LEA is 14,100 tons per day, which would be 84,600 tons per week or approximately “double the existing volumes”.

This leads us to another question since the approved increase to 14,100 tpd is undefined. SCL’s current daily permitted tonnage under their CUP is 12,100 tpd which is composed of 11,000 tpd for solid waste landfill disposal, and an additional 1,100 tpd or 10% that must be recycled. If the LEA is now granting 14,100 tpd it looks like Republic is being given an additional 2,000 tpd of msw or 13,000 tpd msw rather than 12,690 tpd msw and 1,410 tpd for the required 10% for recycle.

In conditioning the approval, it states that Pursuant to 14CCR 17210.2 (f) the LEA may modify, cancel or revoke the use of this waiver if it is determined under Item 2. Page 2, that if the terms of the emergency waiver are not being used expressly for COVID-19 pandemic....” How and who will determine this?

In closing, we don't believe that the Governor's emergency powers were intended to supersede local control in this case or in any other case where the public will be unintentionally exposed to an even greater risk of exposure to COVID-19 while sheltering in place in their homes, than they would have been by going out into public places. The LEA'S approval of this Emergency Waiver of Standards “will pose a threat to public health.” The community has historically pleaded with the various agencies for relief due to our great concerns for the health, safety, and welfare of the community, given that the odor problem has not been entirely eliminated, and now that we will be exposed to even more odors including potential viruses because of the increased tonnage and increased operating hours, our concern is even greater. Prevailing atmospheric conditions from 6 a.m. – 9 a.m. & 6 p.m. – 9 p.m., and the problems they cause for us are well documented. These conditions persist daily, weekly, monthly, and yearly, and they were recognized by the SCAQMD's expert, Dr. Mi-Lee in her report titled “Meteorological Factors Triggering Odor Episodes” (attached), which she submitted to the SCAQMD Hearing Board on November 2, 2016 in a presentation during an Order for Abatement of Odors, Case #3448-14. A sad history of over 11,000 complaints to the SCAQMD from January 2009 to December 2019, shows that what happens in this landfill, happens in our homes.

If you have any further questions, please do not hesitate to contact me.

Sincerely,



Wayde Hunter
President, North Valley Coalition of Concerned Citizens Inc.
Phone: 818 363-3597
Email: WHunter01@aol.com

c.c.

Wayne Nastri, SCAQMD Executive Officer
Nicholas Sanchez, SCAQMD Assistant Chief Deputy Counsel
SCAQMD Hearing Board
Kathryn Barger, Los Angeles County Supervisor, 5th District
Sheila Kuehl, Los Angeles County Supervisor, 3rd District
John Lee, Los Angeles City Councilman, 12th District
Barbara Ferrer, Director, Los Angeles County Department of Public Health
Jeffrey Gunzenhauser, Interim Health Officer, Los Angeles County Department of Public Health
Cynthia Harding, Chief Deputy Director, Los Angeles County Department of Public Health
Coby Skye, Assistant Deputy Director, Los Angeles County Department of Public Works
David Thompson, Program Manager, Sunshine Canyon Landfill-Local Enforcement Agency (SCL-LEA)
Jon Sanabria & Lisa Webber, Co-Chairs, Sunshine Canyon Landfill-Technical Advisory Committee (SCL-TAC)
Bill Piazza, Environmental Assessment Coordinator, LAUSD, Office of Environmental Health & Safety
Margaret Clark, Vice-Chair, Los Angeles County Solid Waste Management Committee/ Integrated Waste Management Task Force
Chris Coyle, Manager, Republic Industries Sunshine Canyon Landfill
Nickolas Hendricks, LA City Planning Department,
Eric Garcetti, Los Angeles City Mayor
SCL-CAC Committee

(6) Attachments

April 20, 2020

Ms. Dorcas (Dee) Hanson-Lugo, REHS, MPA
SCL LEA Program Manager

Local Enforcement Agency
5050 Commerce Drive, First Floor
Baldwin Park, CA 91706

**Subject: Emergency Waiver of Standards Request
Sunshine Canyon Landfill, Permit No. 19-AA-2000**

Dear Ms. Hanson-Lugo,

As you are aware, California Governor Gavin Newsom in Executive Order N-25-20 proclaimed a State of Emergency on March 12, 2020 as a result of the COVID-19 threat. Pursuant to CalRecycle's guidance and SCL-LEA's concurrence, Sunshine Canyon Landfill (SCL), SWFP 19-AA-2000, is requesting a temporary Emergency Waiver of Standards in order to properly manage the waste stream generated during the COVID-19 State of Emergency.

Approval of this variance request will enable the site to temporarily accept the additional waste being generated during the COVID-19 pandemic and provide the site additional time to close after the last load is received. Our commitment to the communities we serve, our employees and the environment remains firm during these times. Onsite, extra precautions will continue to be taken to ensure we are doing everything we can to slow the potential spread of COVID-19. The requested time allowance will ease the burden of maintaining physical distances while utilizing less personnel to manage more waste.

Upon approval, SCL will dispose of waste streams in composite-lined, Class III waste management units designed with gas and leachate collection systems. No medical waste will be accepted at this facility.

Pursuant to Title 14 CCR, section 17210.3:

1. Minimum Standards Requested to be Waived
 - a. Daily Tonnage limit

Increase daily tonnage from 12,100 tons per day to 14,100 tons per day. SCL has existing resources to handle the increased tonnage.

b. Weekly tonnage Limit

Increase weekly tonnage limit from 72,600 tons per week to 84,600 tons per week.

c. Hours of Operation

i. Receipt of Waste 6am to 6pm (Mon.-Fri.), 7am to 2pm (Sat.). No variance required.

ii. Increase landfill operating hours from 6am to 9pm (Mon.-Fri.) to 6am to 11pm (Mon.-Sat.).

2. Remaining Disposal Capacity

a. As of 2/13/2020 SCL has approximately 72M cubic yards of remaining capacity.

3. SCL is expecting that any separation of potentially reusable or recyclable materials will be completed at the point of generation.


4. A Listing of Locally Approved Temporary Sites

a. Temporarily using sites to store disaster related debris for future reuse or recycling is not necessary.

Requesting waiver to be in effect beginning April 20, 2020 for 120 days or longer as needed per Title 14 CCR 17210.2 (f).

Should you have any questions please do not hesitate to email (ccoyle@republicservices.com) or call me directly at 818-362-2141.

Sincerely,



Chris Coyle
General Manager
Sunshine Canyon Landfill

Cc:

- Dave Thompson (Local Enforcement Agency Program – LA Department of Building & Safety)
- Coby Skye (Assistant Deputy Director – LA County Department of Public Works)
- Nick Hendricks (Senior City Planner - LA Department of Planning)
- Gabriel Esparza (Associate Civil Engineer - LA County Department of Public Works)

SUNSHINE CANYON LANDFILL



SCL-LEA



LOCAL ENFORCEMENT AGENCY

14747 San Fernando Road
Sylmar, California 91324

April 27, 2020

Mr. Chris Coyle
General Manager
Sunshine Canyon Landfill
14747 San Fernando Road
Sylmar, CA 91342

Subject: Local Enforcement Agency – Emergency Waiver of Standards for the Sunshine Canyon Landfill, Solid Waste Facility Permit, Swis No. 19-AA-2000

On April 20, 2020, the Sunshine Canyon Landfill, Local Enforcement Agency (LEA), received a written request for an Emergency Waiver of Standards in order to properly manage the waste stream generated during the COVID-19 State of Emergency.

The LEA approves the request from the Sunshine Canyon Landfill for an Emergency Waiver of Standards in accordance with Title 14, California Code of Regulations (14 CCR), Section 17210.4 and the following findings:

1. The Emergency Waiver of Standards is in effect from April 20, 2020 through August 18, 2020.
 2. This Emergency Waiver of Standards allows for the Sunshine Canyon Landfill to:
 - (a) Increase the daily tonnage from 12,100 tons per day to 14,100 tons per day.
 - (b) Increase the weekly tonnage limit from 72,600 tons per week to 84,600 tons per week.
 - (c) Increase landfill operating hours from 6:00am to 9:00pm (Mon. – Fri.) to 6:00am to 11:00pm (Mon. – Sat.). Hours for the receipt of refuse will remain the same as stated on the Solid Waste Facility Permit.
 3. On March 12, 2020, California Governor, Gavin Newsom issued an Emergency proclamation for the State of California, as defined in 14 CCR Section 17210.1 (j).
 4. The Sunshine Canyon landfill is operating with a Solid Waste Facility Permit issued by the LEA. All other state minimum standards and permit terms/conditions which are not the subject of the waiver shall remain in effect.
 5. The approval by the LEA of this Emergency Waiver of Standards will not pose a threat to public health or the environment.
- Pursuant to 14 CCR 17210.2 (f), the LEA may modify, cancel or revoke the use of this waiver without advance notice if it is determined that any of the following conditions occur:


Mr. Chris Coyle
April 27, 2020
Page 2 of 2

1. The operator's use of the emergency waiver will cause or contribute to a public health hazards, or threaten public health and safety or the environment;
2. The terms of the emergency waiver are not being used expressly for COVID-19 pandemic or are not carried out in manner that protects public health and safety or the environment;
3. The emergency waiver is no longer necessary.

Within 90 days from the date of the issuance of this waiver, the Sunshine Canyon Landfill shall submit a report to the LEA in accordance with 14 CCR Section 17210.5 Reporting Requirements for a Solid Waste Facility Operator.

If you have any questions, please feel free to contact me at (626) 430-5540 or dlugo@ph.lacounty.gov.

Sincerely,



Dorcas Hanson-Lugo, SCL-LEA Program Manager
Sunshine Canyon Landfill Local Enforcement Agency

Attachment (waiver request)

cc: Benjamin Escotto, CalRecycle
David Thompson, SCL-LEA Program Manager
Coby Skye, LA County DPW
Nick Hendricks, LA City Dept of Planning
Gabriel Esparza, LA County DPW
Wayde Hunter, SCL-CAC

How Long Does the Coronavirus Live on Surfaces?

Taken from WebMD

Metal

Examples: doorknobs, jewelry, silverware
5 days

Wood

Examples: furniture, decking
4 days

Plastics

Examples: packaging like milk containers and detergent bottles, subway and bus seats, backpacks, elevator buttons
2 to 3 days

Stainless steel

Examples: refrigerators, pots and pans, sinks, some water bottles
2 to 3 days

Cardboard

Examples: shipping boxes
24 hours

Copper

Examples: pennies, teakettles, cookware
4 hours

Aluminum

Examples: soda cans, tinfoil, water bottles
2 to 8 hours

Glass

Examples: drinking glasses, measuring cups, mirrors, windows
Up to 5 days

Ceramics

Examples: dishes, pottery, mugs
5 days

Paper

The length of time varies. Some strains of coronavirus live for only a few minutes on paper, while others live for up to 5 days.

Food

Coronavirus doesn't seem to spread through exposure to food.

From: whunter01@aol.com,
To: etseng@aol.com,
Bcc: javittisr@cs.com, trashmomma@msn.com, bcotter@socal.rr.com, whunter01@aol.com, rekroy@aol.com, megahouse@earthlink.net, ghncndonna@gmail.com, mikemohajer@yahoo.com, cskye@dpw.lacounty.gov, bill.piazza@lausd.net, smartmom47@hotmail.com, nhchahayed@yahoo.com, gitabel@hotmail.com, arlinemelkonian@yahoo.com, stenchalertscl@legendsatcascades.com, zenjinut@aol.com, jecwv@sbcglobal.net, laine@paratusinsurance.com, rcfisk@verizon.net, LibertyTax.gn@gmail.com, whunter01@aol.com, djietr@yahoo.com, ghncndonna@gmail.com, david.thompson@lacity.org, aaron.devandry@gmail.com,
Subject: Fwd: Covid 19 PSA

Date: Sat, Mar 28, 2020 11:54 pm

Attachments: Trash Tips.jpg (301K), COVID-19.pdf (778K)

Thanks Eugene I will post on CAC website, and pass it along to the GHNNC:

Funny, I was contemplating writing a letter to both the City and the County from the North Valley Coalition of Concerned Citizens about the lack of procedures on their websites to properly handle any trash generated at home by those that have been exposed to the virus. What I found was minimal at best... only WHO had information, but even that did not go far enough.

I did read a number of articles about the concerns of persons handling trash, from pickup, to MRFs, to landfilling, along with articles on the time and materials which provide a surface on which the virus can survive,

The above information brought me to my current concern about Sunshine Canyon Landfill..... that unless waste from an infected person is treated the way infectious waste is treated today (autoclaving, adding bleach), even bagging the waste is not proper protection since it is dumped on sorting floors, crushed by trash trucks, and further crushed when compacted at the landfill.... which will only serve to open the bags up... and we all know that our friends have started early opening again at 6 a.m. again.... that's right.... just when the prevailing winds are blowing from the landfill directly on our community and the Van Gogh Elementary School.

So, long story short, maybe there should be some thought to including adding bleach to the bags, and in the title, adding the protection of the neighbors who live in proximity to any landfill, and in closing, I believe the City and the County needs to step up their game on this matter too.

Regards,

Wayde

-----Original Message-----

To: whunter01@aol.com; javittisr@cs.com; trashmomma@msn.com
 Sent: Sat, Mar 28, 2020 7:44 pm
 Subject: Covid 19 PSA

Hi

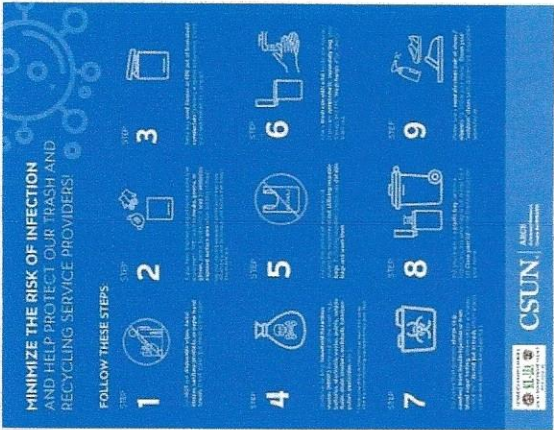
Hope you are staying healthy and staying calm.

Our SCL LEA worked with CSUN students to develop the helpful tips related to trash.

Please feel free to distribute and also to put it onto your CAC website...

Take care
Eugene

1 Attached Images



April 15, 2020

Ms. Margaret Clark
Vice-Chair, Integrated Waste Management Task Force
P.O. Box 1460, 900 South Fremont Street
Alhambra, CA 91802-1460

RE: Sunshine Canyon Landfill Status Report, First Quarter 2020

Dear Ms. Clark,

This letter presents the status report for the first quarter of 2020 as required by Condition 18 of the Los Angeles County Solid Waste Management Committee / Integrated Waste Management Task Force Finding of Conformance (FOC) for the Sunshine Canyon Landfill City/County Project dated December 18, 2008.

A. Progress of City/County Project:

The site has been operating as a joint City/County Landfill as of January 2009. Monthly waste acceptance averages for the first quarter of 2020 are shown below. The site is permitted to accept 12,100 TPD maximum daily capacity (M-S).

Month	Non-buried, Recyclable and Beneficial Reuse Material (Tons)	Total Landfilled Material (Tons)	Averages (TPD)	
			Mon-Fri	Saturday
January	16,957.1	207,093.3	9,188.5	5,476.1
February	8,833.3	181,305	8,627.6	3,517.4
March	8,012.2	204,853.3	9,133.2	2,983.5

B. Progress of the site's landscaping activities and re-vegetation of the permanent slope areas

The Fourth Quarter Vegetation Report was submitted on February 4, 2020.

The Vegetation Report presents the status of the vegetation activities conducted during that respective period. The quarterly vegetation report for the first quarter of 2020 is due by April 30. The fourth quarter 2020 vegetation report was submitted to the following individuals and departments:

Mr. Bahman Hajialiakbar, County of Los Angeles Dept. of Public Works
Ms. Tiffany Butler, City of Los Angeles Department of Planning
Mr. Dave Thompson, SCL LEA Program Manager
Ms. Maria Masis, County of Los Angeles Dept. of Regional Planning
Dr. Wen Yang, Los Angeles Regional Water Quality Control Board
Mr. Wayde Hunter, SCL CAC

Please do not hesitate to contact me if you have any questions.

Sincerely,

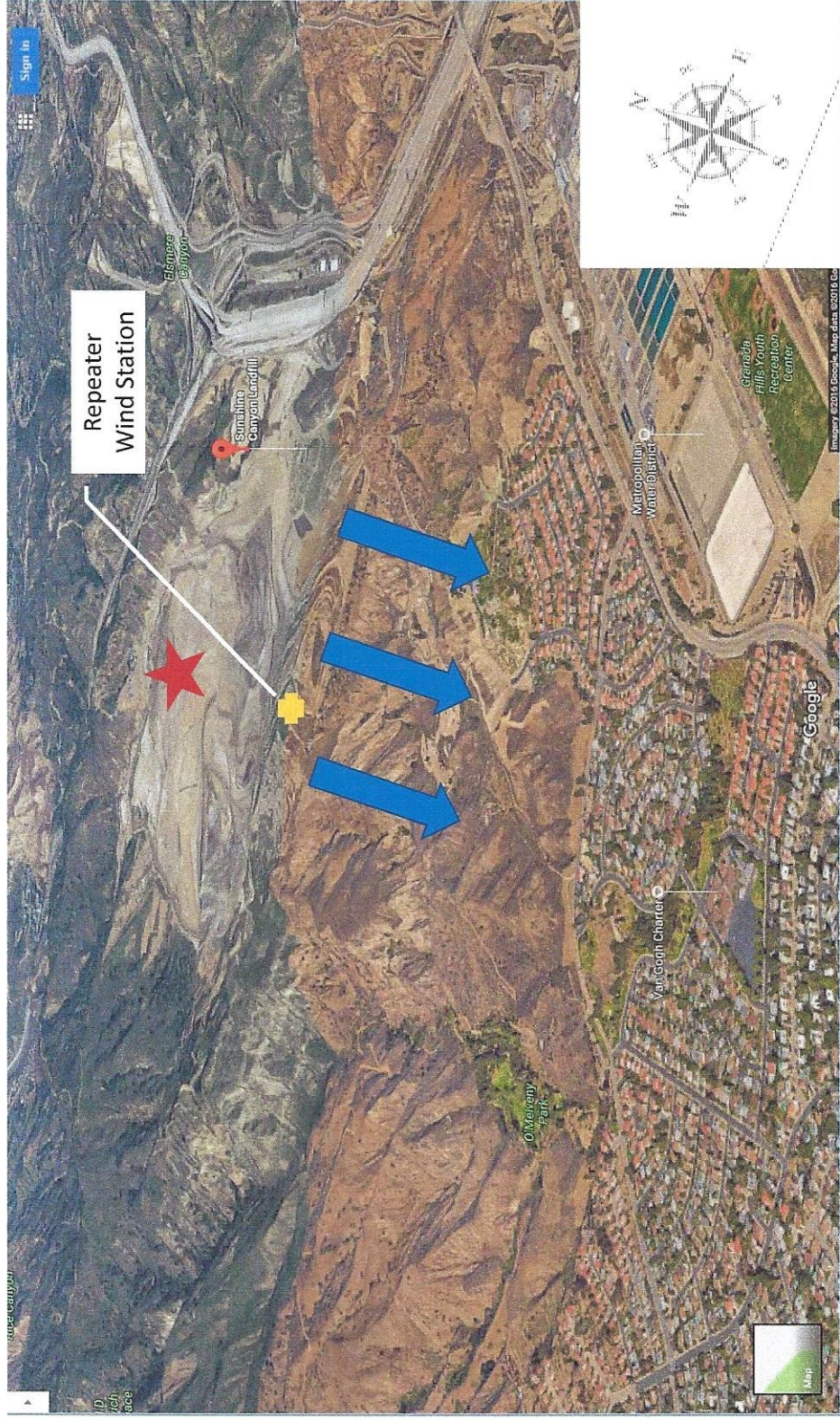


Michael DeYoung
Environmental Specialist
Sunshine Canyon Landfill

Cc: Martins Aiyetiwa, County DPW
Dave Nguyen, County DPW
County DPW Landfills' Unit
Tiffany Butler, Department of Planning
Nicholas Hindricks, Department of Planning
Maria Masis, County of Los Angeles, Department of Regional Planning
Dave Thompson, SCL LEA Program Manager
Dee Lugo, SCL LEA
Wen Yang, LARWQCB
Wayde Hunter, SCL CAC

Meteorological Factors Triggering Odor Episodes

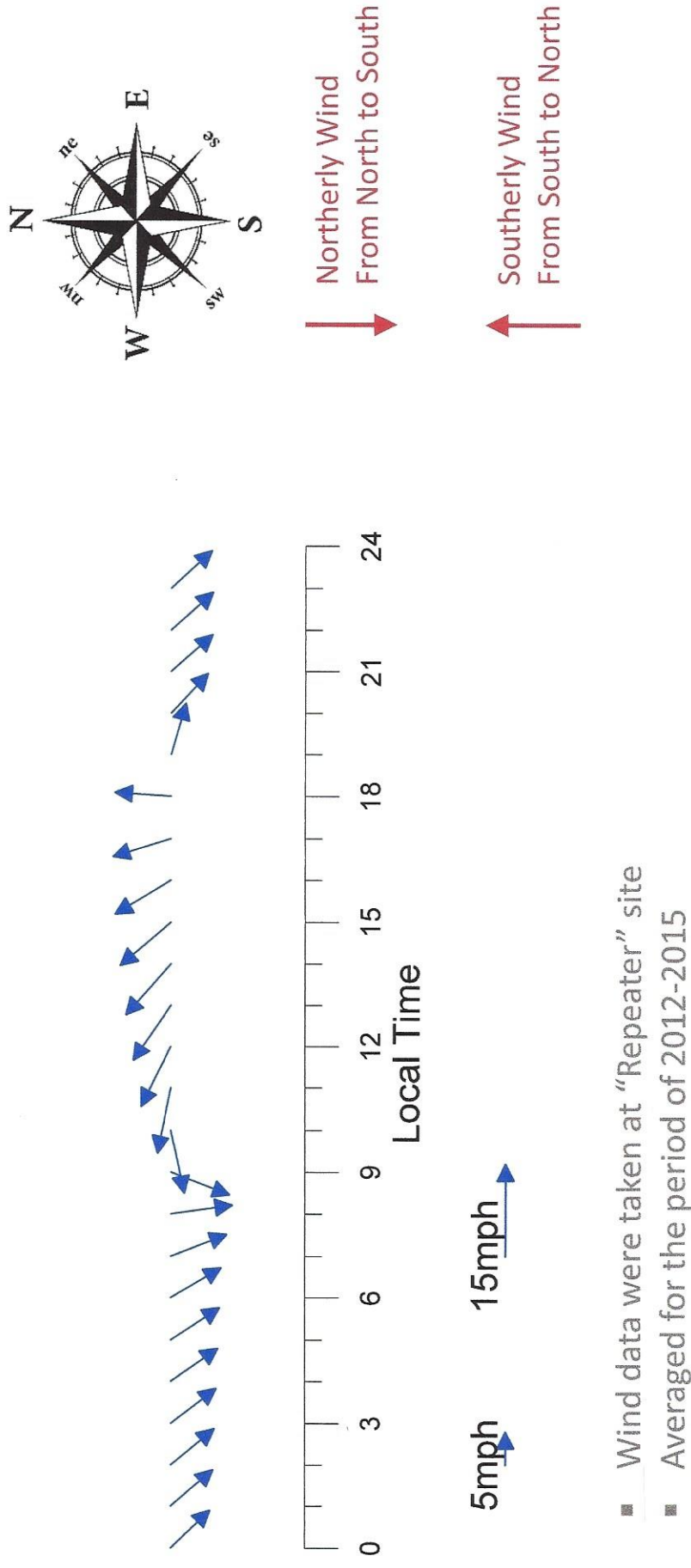
Schematics of the Landfill and Community



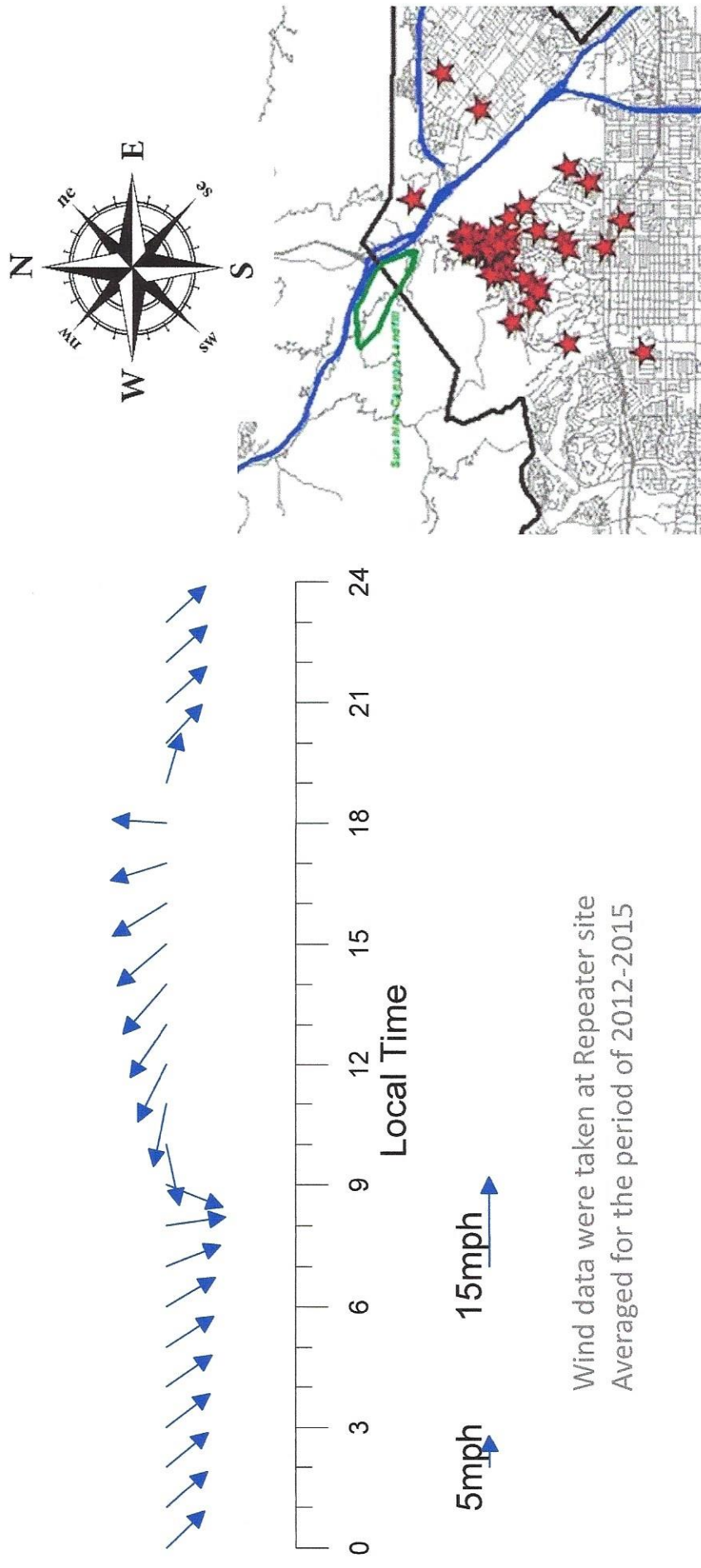
Meteorological Factors to Consider

1. Wind Direction
2. Wind Speed
3. Vertical Mixing (Convection)

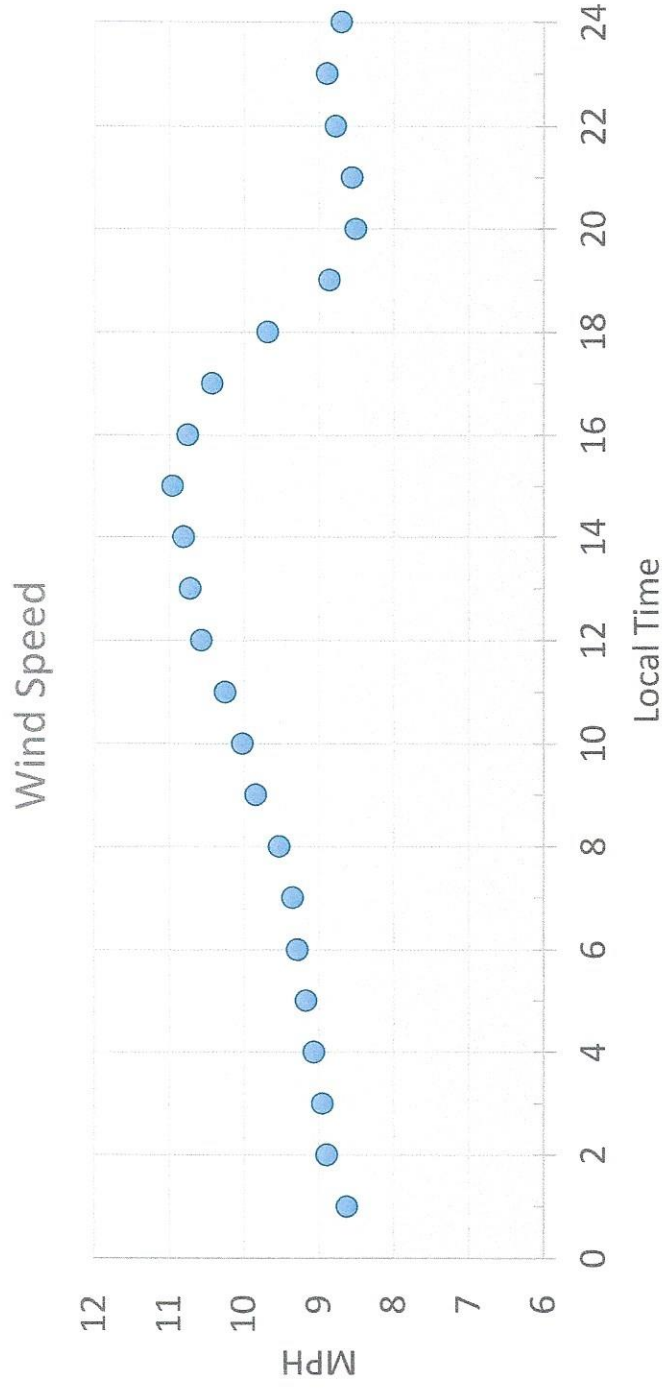
Meteorological Factors to Consider: Wind Direction



Meteorological Factors to Consider: Wind Direction

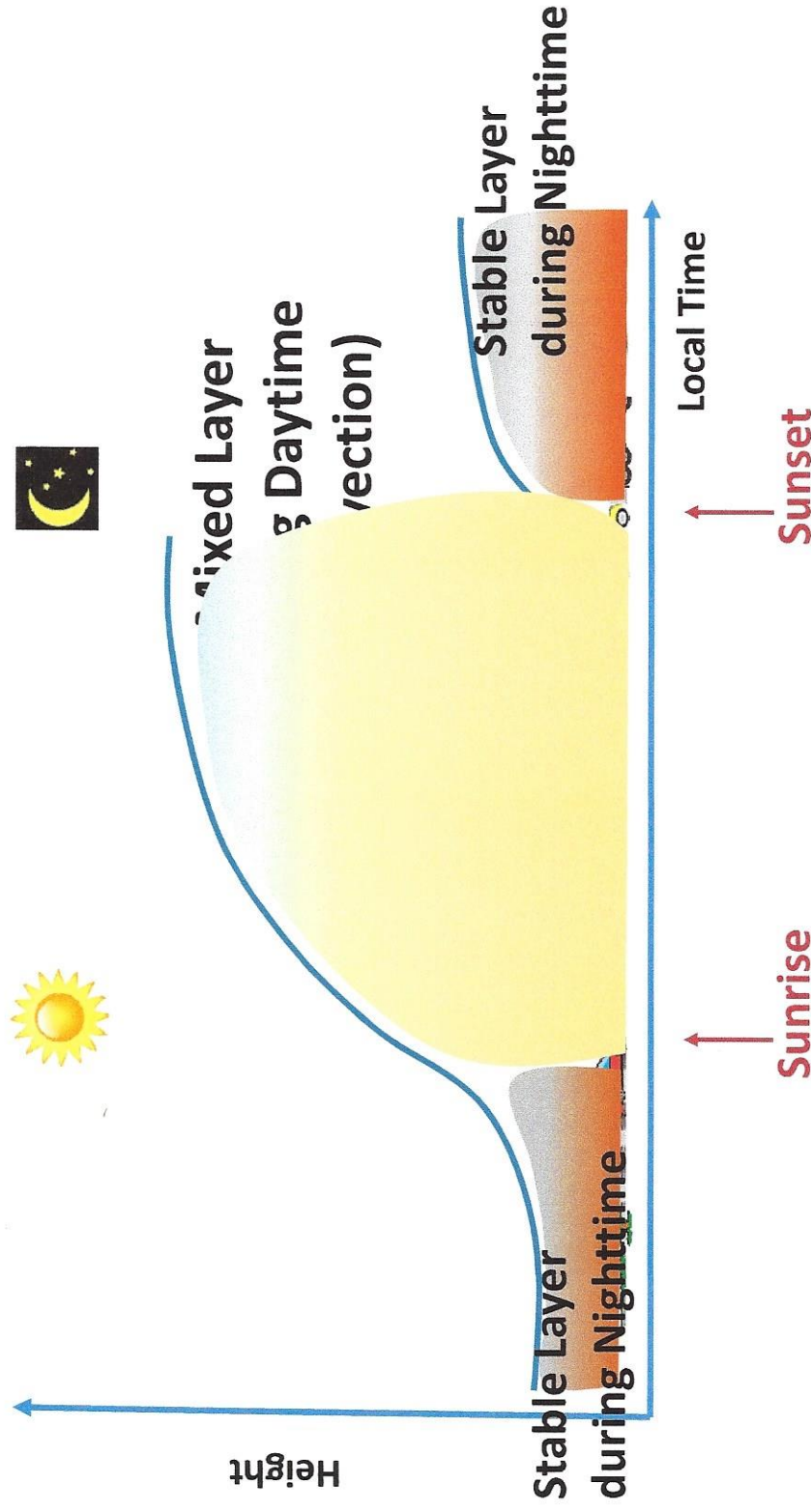


Meteorological Factors to Consider: Wind Speed

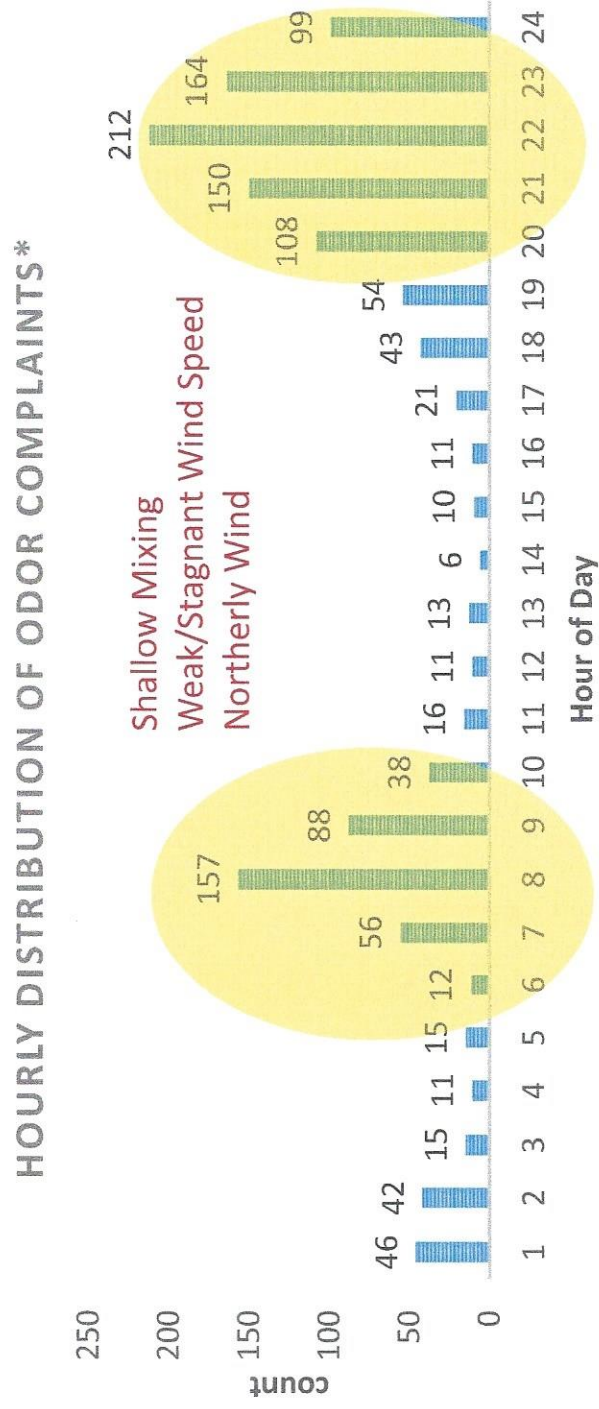


- Wind Speed averaged over the period of 2012-2015
- Measurements were taken at the "Repeater" site

Meteorological Factors to Consider: Vertical Mixing

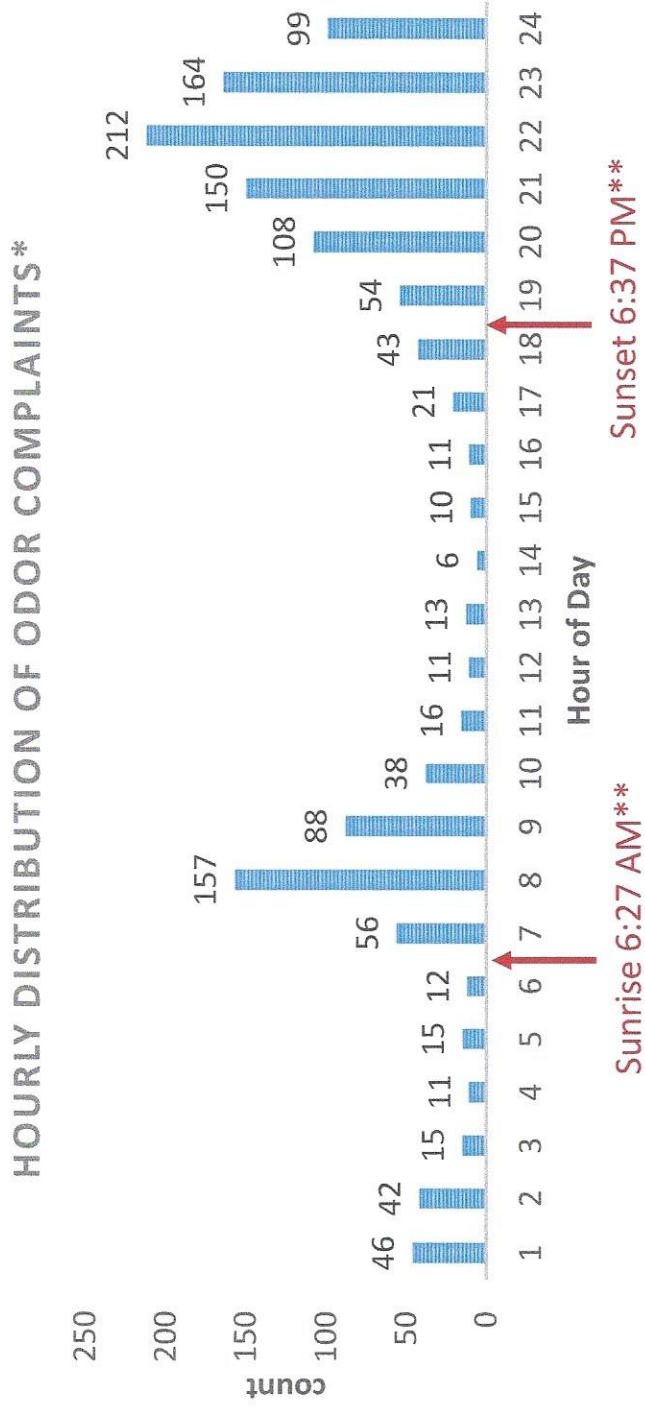


Hourly Distribution of Odor Complaints



*All the complaints received during the period of 2012-2015 are included in the plot

Hourly Distribution of Odor Complaints



*All the complaints received during the period of 2012-2015 are included in the plot

** Sunrise and Sunset hours are 2015 average time for Los Angeles.

** Source of data: U.S. Naval Observatory

Summary and Recommendation

- Considering diurnal variations of wind speed, direction and vertical mixing, a delay of at least 2-3 hours after sunrise would help to mitigate the transport of the odor-laden plum from the landfill to the community.