



# SUNSHINE CANYON LANDFILL – COMMUNITY ADVISORY COMMITTEE CITY & COUNTY OF LOS ANGELES

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Jeanette Capaldi (Vice Chair), Laine Caspi (Secretary), Richard Fisk, Larry Fleck (Treasurer), Wayde Hunter (Chair & TAC Rep), Debbie Pietraszko (Parliamentarian), Donna Zero

February 24, 2021

Los Angeles City Planning Department 200 North Spring Street, Room 575 Los Angeles, CA 90012 Attention: Ms. Devon Zatorski, Management Analyst

Sent via E-Mail

RE: Response to request for comments on the Scope of Work, Ambient Air Quality Monitoring Program at SCL and Van Gogh Elementary School.

Dear Ms. Zatorski:

Thank you for your email of February 18, 2021 (attached) and the opportunity to comment on the draft proposed Scope of Work (SOW) for a contract to engage an Independent Air Quality Monitoring Consultant for the City and the County.

The following SCL-CAC Additional/Edits to the proposed Scope of Work including a Word file of the same for your convenience, that reflect our belief that the "added section" will specifically address the need for a consultant to address the potential short and long-term impacts of the data collected (something that was missing in the original contract).

Further, that the "amendments" indicated should be made to include a third sampling site LN located to the north and upwind of the landfill (as was included in the original contract) in order to accurately quantify the landfill's contribution to air quality impacts (see attached Introduction from 38<sup>th</sup> Quarterly Report, dated March - May 2017 for site LN location).

If I can be of further help and/or if additional clarification is needed please do not hesitate to contact myself or Bill Piazza at: bill.piazza@lausd.net.

Sincerely,

Wayde Hunter

Chair, SCL-CAC

(818) 363-3597 WHunter01@aol.com

c.c.

Jon Sanabria & Lisa Webber, Co-Chairs, SCL-TAC Bill Piazza, EA Coordinator, LAUSD, Office of Environmental Health and Safety

Attachments (3)

## SCL-CAC Additions/Edits to the proposed Scope of Work

#### [Add Section]

Ensure that Annual Ambient Air Monitoring reports address the potential "health risk" posed by landfill emissions. Specifically, 1) provide discussion relating to the potential short and long-term health impacts to individuals exposed to reported PM<sub>10</sub> concentrations from the additional/incremental contribution associated with landfill operations and 2) provide discussion associated with any incremental increase in carcinogenic risk estimates attributed to the landfill's BC (as a surrogate for DPM) and volatile organic compound (VOC) emissions as compared to the estimated modeled carcinogenic risk estimates presented in the SCAQMD's Multiple Air Toxics Exposure Study ("MATES") IV report and/or subsequent reports for the geographic area representative of the community adjoining the landfill.

## [Amend Section]

## Additional Wind Monitoring Location

Consultant shall also determine whether or not there is a need to install air quality sampling and meteorological monitoring equipment additional wind monitor north of the landfill to assess landfill contributions to neighborhood-scale pollutant concentrations when the winds are from the north. Consideration of power supply source will also need to be analyzed and an installation schedule recommended by the Consultant for this additional wind monitor, if necessary monitoring location. Cost associated with this additional work shall be proposed as a separate line item.

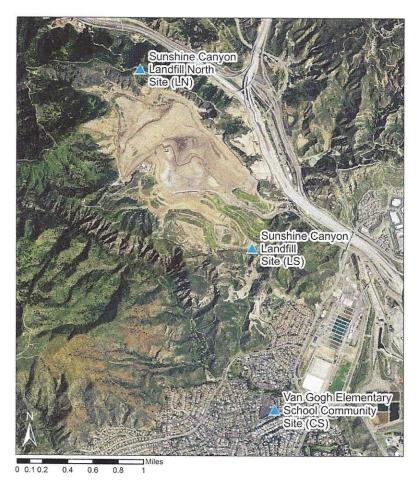
#### [Amend Sections]

All sections that reference monitoring locations (e.g., 2 and 17) in the Scope of Work should be revised, as appropriate, to reflect the inclusion of a third monitoring site.

#### 2/24/2021

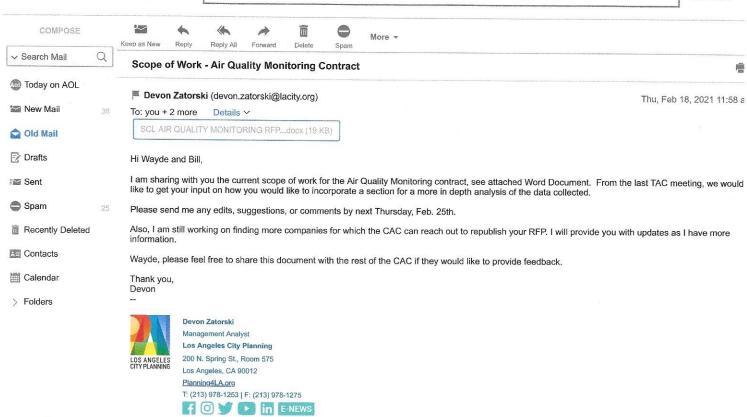
# 1. Introduction

This report summarizes data completeness, ambient PM<sub>10</sub> (particulate matter less than 10 microns in aerodynamic diameter) concentrations, average and maximum black carbon (BC, a surrogate for diesel particulate matter [DPM]) concentrations, instrument flow rate verification (quality control) data, and field operations for the quarterly period of March 1, 2017, through May 31, 2017. This is the tenth consecutive year that spring-season data were collected from continuous monitoring at the Sunshine Canyon Landfill (LS; previously called the Berm Site) and the Van Gogh Elementary School Community site (CS) monitoring locations, and the second year that spring-season data have been collected from continuous monitoring at the Sunshine Canyon Landfill North (LN) monitoring site. The monitoring site locations are shown in **Figure 1**. PM<sub>10</sub> was measured with a beta-attenuation monitor (BAM), and BC was measured with an Aethalometer. Starting July 11, 2016, a one-year program of one-in-six-day sampling of volatile organic compounds (VOCs) and carbonyl compounds began at the LS and CS sites; these VOC data will be summarized in a report after sampling is complete.



**Figure 1.** View of Sunshine Canyon Landfill and the surrounding monitoring stations (triangles): Sunshine Canyon Landfill (LS), Sunshine Canyon Landfill North (LN), and Community site (CS).





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## SCOPE OF WORK

The ambient air quality monitoring program currently relies on continuous (hourly) year-round monitoring of PM10 and BC (as a surrogate for DPM), as well as conducting air toxics samplings. The program also includes meteorological monitoring at the landfill and Van Gogh Elementary School. The following outlines the scope of work:

- Review and evaluate the "Baseline Monitoring Protocol", which consists of the data collection methodology, calibration, QA/QC, audit, records of maintenance work, as well as the latest annual report available.
- Ensure that all air quality sampling and meteorological monitoring equipment located in the trailers at both the landfill berm site and at the Van Gogh Elementary School site are functioning properly. Each trailer houses a Met One Beta Attenuation Monitor (BAM) 1020 and a Magee Scientific (Andersen Instruments) BC monitor (Aethalometer).
- 3. Verify the setup parameters for the BAMs and the Aethalometers.
- 4. Establish a regular maintenance, calibration and audit schedule for the PM10 BAM and Aethalometer as part of an overall Standard Operating Procedure (SOP) and provide regular maintenance and conduct flow calibrations on the BAMS and Aethalometers according to the SOP and maintain such records in a format approved by the SCL-TAC and be made available to the SCL-TAC.
- 5. Examine the meteorological sensors and remove them for repair or replacement as necessary to assure proper operation in accordance with manufacturer's specifications and the SOP, and maintain such records.
- 6. Conduct a general inspection of each site (e.g. trailer and tower condition, HVAC, power supply) and ensure that all equipment is in proper working condition and in accordance with manufacturer's specifications and the SOP, and maintain such records.
- 7. Operate and maintain continuous monitoring of PM10, BC, and meteorology in accordance with established SOPs that define general documentation procedures, safety, data collection/transmittal/storage, and siting requirements, and in a manner that meets a minimum data capture rate of 85% for the BAM and BC monitors consistent with the U.S. EPA's NATTS criteria.
- 8. Provide recommendations meant to ensure that high quality data, which is reliable, verifiable and reproducible, will continue to be obtained from the continuous monitoring program.
- 9. Ensure that power lines are sufficient and are in proper working order at all times. Should power to the sampling and meteorological monitoring equipment go down at any time,

notify the landfill operator's manager immediately and inform City and County staff of the incident.

If on site, notify the landfill operator's site manager immediately and as soon as possible, document such notifications via email to the landfill operator general manager, site manager, City and County staff.

- 10. Conduct air toxics monitoring for volatile organic compounds ("VOCs") and carbonyls at both current air monitoring locations: landfill site and Van Gogh Elementary School. Twenty-four hour samples are to be collected on a one-in-six day basis on the U.S. Environmental Protection Agency (EPA) sampling schedule. Sampling and analysis methods as well as sample minimum detection limits shall be consistent with the District's Multiple Air Toxics Exposure Study (""MATES") IV analysis methods. Considerations should be given to high air toxic sensitivity, specifically for enhanced EPA TO-15 method. If on site, notify the landfill operator's site manager immediately and as soon as possible, document such notifications via email to the landfill operator general manager, site manager, City and County staff.
- 11. Ensure that all protocols for the monitoring of air toxics, sampler placement, and equipment specifications including calibration and equipment backup provisions are under strict quality control and quality assurance as designated in a Quality Assurance Project Plan (QAPP) which will require the Directors of Planning (or designees) and SCAQMD approval. At a minimum, the QAPP must contain a Quality Assurance (QA) section consistent with the goals of the U.S. EPA's NATTS program\*. If co-located sample analysis do not reproduce within 25% at or above five times the detection level for all TO-15 compounds, the run will be considered invalid and all samples associated with that co-located sample pair and the co-located pair must be made up (repeated, i.e. re-sampled and re-analyzed) until the QA goals are met.
- 12. Determine if the air quality near the Landfill is consistent with the emissions estimates of pollutants likely to result from landfill operations modeled in the Final Subsequent Environmental Impact Report (FSEIR). If possible, compare monitoring results with modeled impacts from the FSEIR and evaluate the impact determined from the FSEIR predictions.
- 13. Through statistical analysis, determine if the landfill emissions are having an impact at Van Gogh Elementary School and if the levels of TO-15 compounds are consistent with basin-wide averages as reported in the NATTS and latest MATES data.
- 14. Formalize the results and provide quarterly reports to City and County staff, SCAQMD and the SCL-TAC. An annual report summarizing the year's monitoring events shall be submitted to City and County staff for distribution to SCL-TAC, SCAQMD and other stakeholders.

- 15. Communicate with City and County staff by submitting regular monthly updates to provide a status report and identify any potential issues.
- 16. Attend the City/County Technical Advisory Committee Meeting two or more times a year as requested by City/County staff; attend other technical meetings as necessary at the request of City/County staff (up to two times a year).
- 17. Two monitoring locations are required in the monitoring program. Both monitoring locations use self-contained trailers for the equipment. The first monitor is at the boundary of the landfill with most direct air communication to the Van Gogh Elementary School. It is located at a saddle point on the southwest ridge, in a direct line of sight with the Van Gogh Elementary School. The second site is at the Van Gogh elementary school, near the classroom trailers at the southeast corner of the school property. The monitoring trailer will be located a minimum of 20 yards from tree lines. Power is supplied from a nearby source. Although the monitoring locations have been determined prior to this RFP release, the selected Consultant is encouraged to reevaluate the locations for placement of these two trailers. The City/County/SCAQMD must approve the new locations prior to the start of monitoring.

Monitoring at the Van Gogh Elementary School is conducted within a fenced area sufficiently distant from trees and other obstructions such that sampler probe inlet requirements are met (the distance from the probe inlet to an obstacle must be a minimum of twice the height any obstacle protrudes above the inlet). The location is adjacent to the trailer located on the playground. Power shall be obtained from the trailer, directly from the power box located on the west side of the trailer.

#### Additional Wind Monitoring

Consultant shall also determine whether or not there is a need to install an additional wind monitor north of the landfill to assess landfill contributions to neighborhood-scale pollutant concentrations when the winds are from the north. Consideration of power supply source will also need to be analyzed and an installation schedule recommended by the Consultant for this additional wind monitor, if necessary. Cost associated with this additional work shall be proposed as a separate line item.