

SUNSHINE CANYON LANDFILL



LOCAL ENFORCEMENT AGENCY

14747 San Fernando Road
Sylmar, California 91324

November 2, 2021

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

Subject: Sunshine Canyon Landfill (SWIS No. 19-AA-2000)
LEA Clarification on Loadcheck Procedures

Hello Mr. Hunter,

The Sunshine Canyon Landfill Local Enforcement Agency (SCL LEA) has received your letter regarding the load checking procedures that were utilized at Sunshine Canyon Landfill during the COVID-19 pandemic.

In the initial days of the COVID-19 pandemic, there was not a lot of understanding of the COVID-19 virus and the different routes of infection. Several studies at the time hypothesized that surface to person transmission could be a major pathway for passing the COVID-19 virus to healthy individuals. It was estimated that the virus could remain viable on the surface for several days.

In response to this potential surface to person transmission pathway and its impact on the solid waste industry, the SCL LEA and the City LEA issued the following advisory *COVID-19 Safety Guidance for Solid Waste* that provided basic guidance for solid waste operators to adhere to during daily operations. The SCL LEA collaborated with California State University Northridge – Autonomy Research Center for STEAHM (CSUN-ARCS) in issuing the COVID-19 Public Service Announcement on trash tips titled *Minimize the Risk of Infection and Help Protect Our Trash and Recycling Service Providers!*. Due to the potential surface to person transmission, one of the recommendations was to put your trash in a plastic bag and to tie it closed when it has reached capacity. This would allow the trash to be safely deposited at the landfill while limiting employee contact.

In April of 2020, the SCL LEA management was approached by Sunshine Canyon Landfill's operation supervision requesting to temporarily modify the landfill's loadcheck procedures during the COVID-19 pandemic as a precautionary measure to protect the health and safety of their employees by minimizing the exposure risks. The landfill would continue to conduct the same number of random loadchecks per day. The trash truck drivers would continue to deposit the incoming loads of trash in a long 3-foot windrow in an isolated section of the working face. The designated

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trained loadcheck specialist would observe the unload of the truck and then monitor the trash pile to look for any signs of hazardous waste. The only modification would be that the individual trash bags would not be opened. This would continue to ensure that any macro size hazardous waste, such as barrels, batteries or large boxes, would be detected and removed from the working face.

The LEA agreed to the requested modification to ensure the safety of the site employees during the pandemic. I appreciate that you are in support of this temporary change to the loadcheck program.

Pursuant to 27 CCR 20870, a landfill operator must implement a program to detect and prevent the disposal of regulated hazardous waste. In 27 CCR 20870 (a)(1), states "Random inspections of incoming loads unless the owner or operator takes other steps to ensure that incoming loads do not contain regulated hazardous wastes or PCB wastes". The details of this loadcheck program are to be described in the landfill's Joint Technical Document (JTD).

The Sunshine Canyon Landfill's Loadcheck Program can be found in Sections B.6.4.1 Load Checking Program describes the basic hazardous waste exclusion program, and refers to Appendix H – Load Check Program. In Appendix H, Section 6.2.2 Load Checking Procedure states:

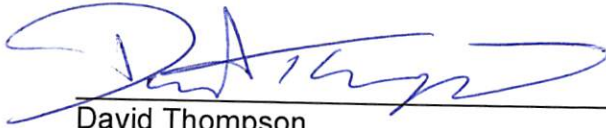
"Once the area has been secured, the hauler will be directed to discharge the load while moving forward, creating a long plie, similar to a windrow, to simplify the load checking. After discharging the load, the hauler will be directed to remain on site during the load checking operation. Properly trained BFI employees will inspect the load looking for unacceptable waste. Upon completion of load checking, all acceptable wastes will be transferred to the working face for disposal. In the event that unacceptable wastes are identified during the load checking operation, the following acts as appropriate will be implemented:"

Appendix H further describes how this waste should be handled and removed from the landfill. The description does not provide specific details as to how the load check is supposed to be conducted other than properly trained employees will inspect the load. Since the temporary change in the load check procedures were consistent with the requirements of 27 CCR 20870 and with the approved JTD, no formal approval was required. The SCL LEA inspection reports were drafted to reflect that the loadcheck program was in compliance with the loadcheck procedures found in the JTD.

As research on the COVID-19 virus progressed throughout the year, it was determined that surface transmission is not the main route by which COVID spreads, and the risk is considered low. In March of 2021, Dr. Barbara Ferrer lifted the stay at home order for the County of Los Angeles. At this time, the SCL LEA met with the management of Sunshine Canyon Landfill and it was agreed upon that

the landfill should resume the full loadcheck procedures that were in place prior to the pandemic. Since that time to present, the load check procedures are back to normal. However, to avoid confusion in the future, the SCL LEA will better document our observations on any temporary modifications to the loadcheck procedures.

Sincerely,



David Thompson
Co-Program Manager
Sunshine Canyon Landfill Local Enforcement Agency



Dorcas Hanson-Lugo
Co-Program Manager
Sunshine Canyon Landfill Local Enforcement Agency

cc: Supervisor Kathryn Barger, County Supervisor 5th District
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