



MARK PESTRELLA, Director

COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

900 SOUTH FREMONT AVENUE
ALHAMBRA, CALIFORNIA 91803-1331
Telephone: (626) 458-5100
<http://dpw.lacounty.gov>

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

February 23, 2022

IN REPLY PLEASE

REFER TO FILE: **EP-5**

Mr. Chris Coyle
General Manager
Sunshine Canyon Landfill
Republic Services, Inc.
14747 San Fernando Road
Sylmar, CA 91342-1021

Dear Mr. Coyle:

SUNSHINE CANYON COUNTY/CITY LANDFILL REQUEST FOR EXPANDED USE OF ALTERNATIVE DAILY COVER (ADC)

On November 8, 2021, Public Works received a letter dated October 22, 2021, (enclosure 1), from Republic Services seeking approval to expand the use of geosynthetic panel as Alternative Daily Cover (ADC) on Saturdays at the Sunshine Canyon Landfill.

As background information, in its January 15, 2019, approval letter (enclosure 2), Public Works approved Republic Services to use geosynthetic panel product in lieu of soil as ADC at the Landfill on a permanent basis. Nonetheless, Condition 3a and 3b of the approval also required the following:

- 3a) *"The ADC material shall be applied at the end of each operating day or at more frequent intervals (except Saturday) and shall be left in place at the start of the following day's operations."*
- 3b) *"Six inches of soil shall be used for daily cover at the close of operations on Saturdays and shall remain in place on Monday mornings."*

However, Republic Services stated at our meeting on October 20, 2021, that commencing in July 2020 the Landfill has not complied with Conditions 3a and 3b's requirement. Specifically, in July 2020 the Landfill began to use ADC material, and discontinue the use of six inches of cover, at the close of operations, upon receiving approval for this practice

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from the Sunshine Canyon Landfill Local Enforcement Agency, even though it did not receive approval from Public Works.

In its November 4, 2021, letter (Enclosure 3), Public Works notified you that the Landfill's non-compliant action is a violation of the conditions of approval [from the January 15, 2019, letter] for the use of ADC and [Condition 45N of] the Landfill's Conditional Use Permit. It also requested that Republic Services immediately come into compliance by applying six inches of soil cover over the working face at the close of operation on Saturdays and in all other areas where cover material may be exposed for more than 24 hours. In response, Republic Services indicated that it would apply full cover with soil on Saturdays going forward while it seeks approval from the County to use Enviro Cover as ADC during the weekend.

Nevertheless, based on the Sunshine Canyon Landfill Local Enforcement Agency site inspector's observations, Republic Services still has not been able to comply with the requirement. Subsequently, Public Works notified the Landfill via e-mail on December 2nd and 13th, 2021, that Republic Services is still out of compliance and Public Works will proceed to refer this matter to the Department of Regional Planning for possible enforcement actions in accordance with the Landfill's Conditional Use Permit.

Consequently, your request for the expanded use of ADC on Saturdays is hereby denied at this time. The following are Public Works' reasons for the denial:

1. Despite repeated notices as stated above and as of the date of this letter, the Landfill still has not been able to come into compliance with Condition 3a and 3b of the January 15, 2019, ADC Requirements. Public Works cannot grant approval of your request while the Landfill is out of compliance with Public Works' requirements.
2. Considering the recent spike in odor complaints and Notice of Violations issued by the South Coast Air Quality District for the increase of odor complaints on not just during the weekend, but also throughout the week, it is important that the Landfill use soil as daily cover over the weekend in order to mitigate the odor caused by new trash that has been exposed for more than 24 hours.

Republic Services must come into compliance with the January 15, 2019, working face soil cover requirements immediately, or Public Works will refer the matter to the Department of Regional Planning for the issuance of a Notice of Violation.

Mr. Chris Coyle
February 23, 2022
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If you have any questions, please contact me or your staff may contact Mr. David Nguyen of our Environmental Programs Division at (626) 458-5189 or dnguyen@dpw.lacounty.gov, Monday through Thursday, 7 a.m. to 5:30 p.m.

Very truly yours,

MARK PESTRELLA, PE
Director of Public Works



PATRICK HOLLAND
Principal Engineer
Environmental Programs Division

MA:kp

P:\SEC\KPIEP5\SUNSHINECYNLANDFILLREQUESTFOREXTENDEDUSEOFADC

Enc.

cc: Department of Regional Planning (Edgar De La Torre, Alex Garcia, Maria Masis)
City of Los Angeles Department of City Planning (Tiffany Butler,
Nicholas Hendricks, Lisa Webber)
Sunshine Canyon Landfill Community Advisory Committee (Wayde Hunter)
Sunshine Canyon Landfill Technical Advisory Committee (Jon Sanabria,
Lisa Webber)
Sunshine Canyon Landfill Local Enforcement Agency (Dorcas Hanson-Lugo,
Shikari Nakagawa-Ota, David Thompson)
Each Member of the Los Angeles County Solid Waste Management Committee
Integrated Waste Management Task Force

Enclosure 1

October 22, 2021

Mr. Martins Aiyetiwa
Los Angeles County Public Works
900 South Fremont Avenue
Alhambra, CA 91803-1331

Subject: Envirocover 48-hour Pilot Program

Dear Mr. Aiyetiwa:

Sunshine Canyon Landfill began using Envirocover™ in 2018 as part of a pilot program upon LEA and DPW approval. During that time, the site saw no significant increase in odor complaints due to the use of the Envirocover. The results of the pilot program were favorable: the material held up as daily cover by eliminating odors and vectors. As such, in July 2020, the site sought to expand the use of Envirocover™ to Saturdays and obtained LEA approval to do so.

Since implementing the Envirocover™ Pilot Program for Saturdays, the site has not seen a significant increase in odor complaints overall. Specifically, if the Envirocover™ was not effective at eliminating odors for more than 24 hours, we would expect to have seen a significant increase in complaints on Sundays and Mondays. However, out of the 578 complaints received since beginning the Saturday usage of Envirocover™ (August 2020 through September 2021), only 3% were received on Sundays and 16% were received on Mondays as shown the table below.

Sunday and Monday Odor Complaints during Saturday use of Envirocover

	Total Month Complaints	Sunday Complaints	Monday Complaints
20-Aug	82	4	22
Sep-20	105	1	5
Oct-20	121	1	24
20-Nov	18	0	5
20-Dec	22	0	2
21-Jan	7	0	0
21-Feb	10	0	6
21-Mar	3	0	0
21-Apr	22	0	3
21-May	4	0	2

21-Jun	31	1	2
21-Jul	27	0	4
21-Aug	71	13	13
21-Sep	55	2	6
TOTAL	578	22	94

SCL is committed to being a good neighbor and eliminating odor nuisance in our community. We have been working toward this goal tirelessly, and have implemented the following enhanced odor mitigation measures within the last year:

- Daily dedicated odor patrol team, patrolling the landfill and the neighborhood during unfavorable weather conditions and coordinating with on-site personnel
- Stopping all operations entirely (tipping, compacting, etc.) when odors are detected anywhere outside the working face
- Increased usage of odor neutralizer product along misting lines and monsoons
- Reduced inbound traffic during unfavorable weather conditions

In addition to the measures above, SCL is adding four new full-time staff positions which will be solely dedicated to daily odor patrol and odor-nuisance prevention. The cost of these positions is substantial, but essential to maintaining our good relationship with the community. We believe the use of Envirocover™ on Saturdays enables us to more effectively combat odors by allowing flexibility with regard to daily cover.

Enclosed is a copy of the pilot program approved by the LEA in July 2020, which we request be reviewed and considered for approval by DPW.

We look forward to continuing to work with DPW on this matter; please do not hesitate to contact me with any questions or concerns.

Sincerely,

Chris Coyle
 General Manager
 Sunshine Canyon Landfill

Enclosure 2



MARK PESTRELLA, Director

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IN REPLY PLEASE

REFER TO FILE: **EP-5**

January 15, 2019

Mr. Chris Coyle, General Manager
Sunshine Canyon Landfill
Republic Services, Inc.
14747 San Fernando Road
Sylmar, CA 91342-1021

Dear Mr. Coyle:

SUNSHINE CANYON CITY/COUNTY LANDFILL ALTERNATIVE DAILY COVER PILOT PROJECT UTILIZING GEOSYNTHETIC PANEL PRODUCT

On September 21, 2018, Republic Services submitted a Report titled "Evaluation of Alternative Daily Cover (ADC) Using Geosynthetic Panel Product" for the third year of the Pilot Project at Sunshine Canyon Landfill. The report presents the findings for the timeframe of October 1, 2017, to August 31, 2018. The pilot project began on October 12, 2015 and has been approved for two 1-year extensions by Los Angeles County Public Works.

Based on the data and information presented in this report, Public Works hereby approves Republic's request for a modification of the additional corrective measures imposed by Public Works in accordance with Condition 45N of the Conditional Use Permit (CUP) and the use of the geosynthetic panel product as ADC on a permanent basis and the cessation of the pilot project. The approval is subject to the following conditions:

General Conditions of Approval

Effective Area – These requirements apply to all areas within the "Limits of Fill" of Exhibit "A-2" as defined in the combined "City/County Project" pursuant to the Los Angeles County CUP.

Standards and Program Requirements

1. ADC Material Specifications – The ADC material to be used shall be limited to a non-reusable, geosynthetic Extended Enviro™ cover with a thickness of 1.75 millimeters, as stated in the Republic Services' original proposal. Any proposed change of this ADC material will require prior approval from Public Works.
2. Equipment Specifications – The Extended Enviro™ cover shall only be deployed using EPI's extended Enviro™ Cover System Deployer Model 800 (Deployer). Any proposed change to this equipment will require prior approval from Public Works.
3. ADC Material Procedures – The ADC material shall only be applied as described in the following restrictions:
 - a. The ADC material shall be applied at the end of each operating day or at more frequent intervals (except Saturday) and shall be left in place at the start of the following day's operations.
 - i. No removal of this ADC material shall be conducted after it is applied at the Working Face.
 - ii. The ADC material will be placed over the entire deck of the operating day's Working Face.
 - iii. The maximum exposure time for the ADC material shall not exceed 5 days.
 - iv. The ADC material shall not be placed on any outside slopes or slopes that will not be part of the operating day's Working Face for longer than 180 days.
 - v. The ADC material shall not be used for intermediate or final cover.
 - b. Six inches of soil shall be used for daily cover at the close of operations on Saturdays and shall remain in place on Monday mornings.
 - i. Republic is allowed "peel back" operations of the soil cover Monday mornings at the Working Face.
 - ii. There shall be no "peel back" in places where the cover soil has been in place for more than 30 days.
 - iii. The "peel back" operations shall be managed in a manner to minimize odors.
 - iv. Only soil may be used as cover on the outside and temporary slopes.

- c. The ADC material will be used on one lift per day.
 - d. The maximum size of the Working Face deck area shall be no larger than 3 acres.
4. Material Placement – The ADC material shall be placed as detailed in Republic Services' Report as follows:
- a. General Placement Procedure
 - i. The Deployer is loaded with a roll of the Extended Enviro™ cover and on-site ballast material.
 - ii. The Deployer is positioned on the outside edge of the cover area to deploy the first panel of the ADC material. The outside edge shall be positioned at a minimum of 5 feet from the outside of the waste material.
 - iii. During the application process, the ADC material is unrolled from the Deployer while ballast material is simultaneously discharged at a controlled rate to securely anchor the ADC material onto the Working Face.
 - iv. On successive adjacent runs to deploy the ADC material. The material is placed so that it overlaps by not less than 10 percent, thus forming a compression-type seal creating a continuous closure and impermeable barrier between the waste and the environment.
 - b. Placement During Windy Conditions – During high-wind conditions, the following operational measures shall be implemented and maintained:
 - i. Wind direction and speed must be established to better determine how the ADC material will be deployed.
 - ii. Upon determination of the wind direction, the ADC material will be placed parallel to the wind direction to minimize the potential uplifting of the material.
 - iii. Additional overlap of the ADC material can be applied, provided that natural tearing and puncturing of the overlapped material as a result of the heavy equipment operating on top of previously covered trash is maintained.
 - c. Placement During Rainy/Stormy Conditions – During rainy/stormy conditions, the following operational measures shall be implemented and maintained:

Mr. Chris Coyle
January 15, 2019
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- i. Intactness of the ballast material shall be maintained to ensure that the ballast material is not washed away by water runoff.
 - ii. No ponding on the surface of the ADC material shall occur. If ponding occurs, appropriate measures shall be taken to resolve this issue.
 - iii. Placement of the ADC material on the working face shall be appropriately deployed to prevent stormwater run-off underneath the ADC material and to inhibit continuous contact of stormwater on the disposed solid waste.
- d. If conditions such as high-winds or heavy rains prevent compliance with these restrictions and prevent the ADC material from functioning properly, the operator shall cover the Working Face with 9 inches of soil, which shall be kept in place at the beginning of the next operating day. Republic can “peel back” the next day following the same ADC material procedures as on Monday mornings.

Public Works reserves the authority and discretion to modify or apply additional measures to the use of the ADC in the future, as deemed necessary, in accordance with Condition 45N of the Landfill’s CUP.

Mr. Chris Coyle
January 15, 2019
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For questions regarding this matter, please contact Mr. David Nguyen of Environmental Programs Division, at (626) 458-5189 or dnguyen@dpw.lacounty.gov.

Very truly yours,

MARK PESTRELLA
Director of Public Works



CARLOS RUIZ
Principal Engineer
Environmental Programs Division

MC:jl

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cc: Los Angeles County Department of Regional Planning (Maria Masis,
Tim Stapleton)
Los Angeles County Department of Public Health (Shikari Nakagawa-Ota,
Maurice Pantoja, Dorcas Hanson-Lugo)
City of Los Angeles Department of City Planning (Tiffany Butler,
Nicholas Hendricks)
Sunshine Canyon Landfill Local Enforcement Agency (Shikari Nakagawa-Ota,
Maurice Pantoja, Dorcas Hanson-Lugo, David Thompson)
Sunshine Canyon Landfill Technical Advisory Committee (Lisa Webber,
Jon Sanabria)
Sunshine Canyon Landfill Community Advisory Committee (Wayde Hunter)
Members of the Los Angeles County Solid Waste Management
Committee/Integrated
Waste Management Task Force

Enclosure 3



MARK PESTRELLA, Director

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ALHAMBRA, CALIFORNIA 91802-1460

November 4, 2021

IN REPLY PLEASE

REFER TO FILE: **EP-5**

Mr. Chris Coyle
General Manager
Sunshine Canyon Landfill
Republic Services, Inc.
14747 San Fernando Road
Sylmar, CA 91342-1021

Dear Mr. Coyle:

**SUNSHINE CANYON COUNTY/CITY LANDFILL
CONDITIONAL USE PERMIT NO. 00-194-(5)
PLACEMENT OF SOIL COVER REQUIREMENT ON SATURDAYS**

Thank you for meeting with Public Works on October 20, 2021, to discuss the attached North Valley Coalition of Concerned Citizens' letter dated October 11, 2021, regarding lack of soil cover over disposed trash at the end of the working day, and prior to the Sunshine Canyon Landfill (Landfill) being closed for the weekend. The letter further alleges that the lack of soil cover may be contributing to the odor nuisance impacting the community.

Republic Services has acknowledged that the Landfill has not been applying the soil cover over the working face on Saturdays as required in Public Works January 15, 2019, approval letter for the use of an Alternative Daily Cover (ADC) (enclosed) but, disagreed that this non-compliance action is a contributing factor to the odor nuisance. You are hereby notified that this non-compliant action is a violation of the conditions of approval for the use of ADC and the Landfill's Conditional Use Permit.

As stated in my October 21, 2021, e-mail to you (enclosed), the Landfill needs to immediately come into compliance by applying six inches of soil covers over the working face at the close of operation on Saturdays and in all other areas where cover material may be exposed more than 24 hours. The landfill also needs to comply with other requirements as specified in Public Works ADC Approval letter.

Mr. Chris Coyle
November 4, 2021
Page 2

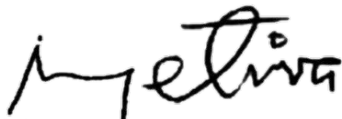
In response, you have acknowledged that the Landfill will apply full cover with soil on Saturdays going forward while the Landfill seeks approval from the County to use Enviro Cover as ADC during the weekend.

Going forward, this letter serves to notify you that if the Landfill fails to abide by the requirements in our January 15, 2019, ADC approval letter, Public Works may refer the matter to the Department Regional Planning for enforcement in accordance with the terms of the Landfill's Conditional Use Permit.

If you have any questions, please contact me or your staff may contact Mr. David Nguyen at (626) 458-5189 or dnguyen@pw.lacounty.gov, Monday through Thursday, 7 a.m. to 5:30 p.m.

Very truly yours,

MARK PESTRELLA, PE
Director of Public Works



MARTINS AIYETIWA
Senior Civil Engineer
Environmental Programs Division

MA:rw
P:\SEC\RW\EP5\ADC COMPLIANCE NOTIFICATION LTR.DOCX

Enc.

cc: Department of Regional Planning (Edgar De La Torre, Alex Garcia, Maria Masis)
City of Los Angeles Department of City Planning (Tiffany Butler,
Nicholas Hendricks, Lisa Webber)
Sunshine Canyon Landfill Community Advisory Committee (Wayde Hunter)
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