



South Coast Air Quality Management District

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Transmitted via E-mail [taskforce@dpw.lacounty.gov] and U.S. Mail

June 1, 2023

Ms. Margaret Clark
Los Angeles County Solid Waste Management Committee/
Integrated Waste Management Task Force
Los Angeles County Public Works
Environmental Programs Division
900 S. Fremont Ave., 3rd Floor Annex
Alhambra, CA 91803-1331

Re: Response to Recommended Odor Mitigation Measures
to Mitigate Odor at Sunshine Canyon Landfill

Dear Ms. Clark:

I was forwarded your April 13, 2023, letter on behalf of the Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) regarding odor complaints and public nuisance violations alleging Sunshine Canyon Landfill (SCL) as the source of the odor. South Coast AQMD (District) shares the Task Force's concern whenever there is an increase in odor complaints alleging SCL as the source and the District contacts all complainants and regularly conducts inspections of the landfill to confirm operations comply with District rules and regulations.

I am attaching two response letters that were sent to the North Valley Coalition of Concerned Citizens to provide the Task Force additional details of the District's engagement with members of the community who live near the landfill and the District's investigation into the increase of odor complaints. The District has met with representatives from the County of Los Angeles Department of Public Works, the SCL-Local Enforcement Agency, and additional City and County of Los Angeles agencies with authority over the landfill to identify what may have contributed to the odor events and what operational changes could be implemented to mitigate odors and provide relief to the nearby community.

We appreciate the odor control measures provided in the Task Force's letter for the District's consideration to address the mitigation of odors from the landfill's operations. The District recently reached an agreement with the landfill in which they committed to perform immediate odor mitigation measures sought by the District to address the spike in public nuisance events impacting the nearby community. The recent implementation of the odor mitigation measures appears to have paused ongoing issuance of public nuisance violations. The odor mitigation measures are summarized below:

Cleaning the air that we breathe...™


Gas Field Improvements	Target Dates
SCL agrees to install 40 new or replacement wells by 6/30.	On schedule – June 30 th
SCL will use one additional drilling rig if needed.	On schedule – June 30 th
SCL to install 5,550 ft of horizontal gas collectors by 6/30.	On schedule – June 30 th
Evaluate new and existing wells for liquids & install pumps if needed.	Ongoing within 30 days of installation, all wells evaluated at least once quarterly
Increase existing dewatering pump operational efficiency from 70% to a minimum of 85% by increasing the dedicated pump technician crew size from two to four.	On schedule – June 30 th
Tune all wells at least monthly. For grids found to have surface emissions over integrated monitoring limits (25 ppm) during the quarter ending 3/30/2023, SCL will consult with SCAQMD and the LEA and will perform intermediate cover enhancements such as additional soil and/or clay or hydroseeding (ahead of winter months) which could have a more immediate impact.	Immediate and ongoing
Prohibit new well drilling before 9 am.	Immediate
Position an odor-neutralizer delivery system (a Buffalo Monson or similar system) at each drill rig.	Immediate
Intermediate Cover Improvements	
Continue monthly integrated and instantaneous surface monitoring.	Immediate
With the concurrence and support of the LEA, SCL will make requests to the City and County to bring in more soil beyond local agency (e.g., CUP) limits to improve areas of intermediate cover in grids found to have excess surface emissions.	Immediate
Working Face Adjustments	
Reduce traffic lanes into the working face, subject to safety considerations, to further reduce the working face size during morning disposal operations.	Immediate

Apply tarps to areas of working face that have not been disturbed for two hours; apply neutralizer when tarps are removed.	Immediate
Odor Control Systems	
Operate landfill stationary wet and dry misting systems 24/7.	Immediate
Utilize Buffalo Monsoon (portable mist and odor neutralizer blowers) or similar system during the day and evening “complaint” hours.	Immediate
Three “Weaver” portable vapor trailers will be strategically placed near the landfill working face based on wind direction.	Immediate
Odor Patrols and Disposal Operation Adjustments	
SCL to implement pre-operations odor patrol (2 people) – one at the landfill and one in the neighborhood, starting at 5 am.	Immediate
Full odor patrols (3-4 people) starting at 6 am will be assigned onsite and in the neighborhood until and unless a favorable mid-day weather pattern is established.	Immediate
Communications Strategy	
SCL to provide an email report to SCAQMD every Friday by COB on the status of this action plan’s elements as described above, and with a summary of odor patrol reports.	Immediate

The District is monitoring complaints alleging odors from the landfill and the landfill’s progress on the implementation of the odor mitigation measures to evaluate whether additional conditions or administrative action is needed. The District is committed to addressing all air quality violations relating to Sunshine Canyon Landfill and will continue to monitor the facility’s operations and diligently pursue proper enforcement.

Also, I would like to confirm the District will send a representative to attend the Task Force’s Facility and Plan Review Subcommittee Meeting on June 15 per Ms. Anna Gov’s May 25 request. Thank you for your correspondence.

Sincerely,


 Nicholas A. Sanchez
 Assistant Chief Deputy Counsel



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March 21, 2023

Sent via electronic mail to whunter01@aol.com

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

Re: Request for Order for Abatement against Sunshine Canyon Landfill

Dear Mr. Hunter,

This is in response to your letters dated November 18, 2022, and March 10, 2023 to South Coast AQMD Executive Officer Wayne Nastri, reintroducing your prior requests for South Coast AQMD to petition the Hearing Board for an Order for Abatement regarding Sunshine Canyon Landfill (facility). We have been gathering additional information to respond to your request, including tracking the resolution of the variance petition filed by the facility in November 2022. That variance was withdrawn by the facility, following their flare passing a source test.

As outlined in the prior response letter dated August 30, 2022, South Coast AQMD continues to take immediate enforcement action as appropriate to address the odor issues related to Sunshine Canyon Landfill's operations. In fact, the Notices of Violation issued to the facility, as outlined in Exhibit BBB to your November 18 letter, evidences that South Coast AQMD is in no way excusing violations of air quality standards. Our inspectors timely respond to community complaints and take proper and immediate enforcement action, including issuance of a Notice of Violation, when a public nuisance has been identified.

We appreciate the additional information provided in your November 18 letter, attached as Exhibit EEE [County Public Works letter to Republic Services re: CUP Permitted Tonnages Exceedances and Prior Authorization of Clean Soil Importation dated November 15, 2022] and Exhibit FFF [County Public Works letter to Republic Services re: Third Quarter 2022 Quarterly Dust/Odor Complaint Report dated October 31, 2022]. In exercising due diligence, our agency has met with representatives from County of Los Angeles Department of Public Works (DPW) to further investigate the information provided in the exhibits.

Exhibit EEE discusses DPW's determination that the facility had exceeded the daily tonnage capacity of 12,100 tons for all materials and the daily tonnage limit of 2,500 tons of imported soil on specified dates for the months of July, August, and September 2022. After discussing with DPW and reviewing the data enclosed in Exhibit EEE, it is our understanding that the dates of daily tonnage exceedances for all materials considerably overlaps with the dates of daily tonnage exceedances of imported clean soil. While this may be a violation of the

Wayde Hunter
March 21, 2023

Conditional Use Permit (CUP), South Coast AQMD does not enforce the CUP. Further, it does not appear that there is a significant correlation between the daily tonnage exceedances highlighted in Exhibit EEE and issuance of odor nuisance violations. For example, despite numerous days of daily tonnage exceedances in July and August 2022, no odor nuisance violations were issued in those months. Nevertheless, we appreciate you bringing this to our attention and welcome any additional information regarding the facility's operations.


Exhibit FFF assesses the facility's quarterly fugitive dust and odor complaint report for the third quarter of 2022, as required under the CUP. In the letter, DPW notes that the report "as submitted is not adequate to allow the regulatory agencies to assess the nature and extent of the problem and the effectiveness of Republic's mitigation measures" and requires the facility "to revise and resubmit the report" within 15 days (Exhibit FFF, p. 2.) While the South Coast AQMD does not enforce the CUP, Exhibit FFF is helpful to demonstrate that there are multiple regulatory agencies working to ensure lawful operations at the facility and respond to the community's concerns. Further, your March 10th letter included Exhibit GGGG, which pertained to a January 2023 violation issued by the SCL-LEA to the facility for litter control and for drainage and erosion control under 27 California Code of Regulations Section 20830 and 20650, respectively. As your letter recognized, South Coast AQMD is not responsible for enforcing the citations. But we appreciate you providing this information and will continue to coordinate interagency efforts as necessary.

As you are aware, an Order for Abatement is one of several enforcement actions that South Coast AQMD may pursue. We monitor the trend in violations and assess the appropriate enforcement action. While no Notices of Violation were issued in November and December 2022 and significantly fewer complaints were received as compared to the same months in 2021, we have responded swiftly to the increased community complaints received in January and February 2023 and have issued numerous Notices of Violation for public nuisance. Our Compliance and Enforcement team has been responsive to community complaints and the investigation into the recent odor violations and legal prosecution, is still ongoing.

I am not aware of any written South Coast AQMD policy or procedure regarding public requests for Odor Abatement Hearings, but can forward this request to our Public Records unit to conduct a thorough search.

We are committed to addressing all air quality violations relating to Sunshine Canyon Landfill and will continue to monitor the facility's operations and diligently pursue proper enforcement. Thank you for your correspondence. If you have any questions, you may contact me Tuesday through Friday at (909) 396-3400 or by email at nsanchez@aqmd.gov.

Sincerely,


Nicholas A. Sanchez
Assistant Chief Deputy Counsel



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General Counsel's Office

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August 30, 2022

Sent via electronic mail to whunter01@aol.com

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

Re: Request for Oder for Abatement against Sunshine Canyon Landfill

Dear Mr. Hunter,

Thank you for your letter dated July 27, 2022, renewing your February 19 request for community meetings to be held in Granada Hills and for South Coast AQMD to petition the Hearing Board for an Order for Abatement. I can confirm that I personally track the enforcement activities concerning Sunshine Canyon Landfill and shared your concerns following the issuance of five (5) Notices of Violation (NOVs) during the month of January.

I immediately looked into the matter and the 158 complaints received that month, and found that there were record levels of waste tonnage generated during the 2021-22 holiday season, heavy rain events, and a surge in the Omicron variant of the coronavirus. The Omicron surge resulted in significant absences of transfer van fleet workers and City of Los Angeles and independent trash haulers. It was reported that waste going to the landfill was stored outside of transfer stations and became water-logged, resulting in increased odorous loads. The landfill took actions in response to this combination of events, the results of which are reflected in the data you provided – namely, the significant drop in complaints and NOVs issued.

Regarding your request for community meetings in Granada Hills, South Coast AQMD staff regularly attend Sunshine Canyon Landfill Community Advisory Committee (CAC) meetings and Sunshine Canyon Landfill Joint City/County Technical Advisory Committee (TAC) meetings, where we provide updates and answer questions from the community. I can confirm that South Coast AQMD staff attended the January, April, and July CAC meetings, and the June TAC meeting.

South Coast AQMD is closely following the situation at the landfill, and we will continue to respond to all community complaints and pursue appropriate enforcement action. Thank you for your correspondence. If you have any questions, you may contact me Tuesday through Friday at (909) 396-3450 or by email at nsanchez@aqmd.gov.

Sincerely,

Nicholas A. Sanchez
Assistant Chief Deputy Counsel