

June 1, 2024

Mr. David Nguyen
Civil Engineer
County of Los Angeles, Department of Public Works
900 South Fremont Avenue
Alhambra, CA 91803-1331

**Subject: 2023 Sunshine Canyon Landfill Joint Annual Report Response to
Comments**

Dear Mr. Nguyen,

Sunshine Canyon Landfill had prepared a draft Joint Annual Report dated April 1st, 2024 and disseminated the draft report to the following agencies: DPH-SWMP, Director of the Department, Director of Public Works, Los Angeles County Forester and Fire Warden, Regional Water Quality Control Board-Los Angeles Region, South Coast Air Quality Management District, County Museum of Natural History, and Community Advisory Committee.

Sunshine Canyon received comments from L.A County Department of Public Works and the L.A. County Planning, LA County Fire Department regarding the 2023 Joint Annual Report. Per IMP Part XII Republic Services shall respond to each of the comments and shall include every comment and response with the 2023 Final Annual Report that will be submitted to the Regional Planning Commission and the Sunshine Canyon Landfill – Technical Advisory Committee. Please find the comments and responses below.

Should you have any questions please do not hesitate to contact me at (818) 698-0948.

Sincerely,



Kate Downey

Environmental Manager
Sunshine Canyon Landfill

GENERAL COMMENTS from DPW

Comment 1: All Pertinent plans or maps shall be stamped and signed by a licensed surveyor or registered civil engineer. Please include these stamped plans or maps in the 2023 Final Annual Report including the Landfill Survey.

Response 1: All pertinent plans or maps have been stamped and signed by a licensed surveyor or registered civil engineer.

SPECIFIC COMMENTS

2.1a Off Hour Operations

Comment 2: Please confirm the time and dates operations outside of permitted hours took place for February 23, 2023, September 9, 2023, and December 20, 2023. The data provided in the annual report doesn't match the monthly LEA report.

Response 2: There were in fact no late closures on the Dates of February 23rd and September 9th. There was a late closure on December 20, 2023 and this is listed in the December monthly LEA report. September 12, 2023 and December 26th were not listed on the preliminary draft but have been added as dates operations took place outside of permitted hours.

2.2.1 Daily, Monthly, and Cumulative Disposal (IMP X.B.1 & X.B.4, [Q] A.6)

Comment 3: Please define or explain asterisk for "Recycling Greenwaste*" category in Beneficial Reuse and Recycling Table. The asterisk does not point to any information.

Response 3: The asterisk was inadvertently included, and has been removed from the final report.

Comment 4: Please confirm or correct the May 2023 beneficial reuse material tonnage as 6,946 tons or 6,943 tons as presented in Appendix A – Monthly Tonnage Report.

Response 4: Beneficial reuse material tonnage was corrected from 6,946 tons to 6,943 tons as reported in May Monthly Tonnage Report.

2.2.2 Capacity (IMP X.B.1)

Comment 5: Per the report, the total operational density is based on monthly operational density calculations. Please provide calculation or monthly density values. In the 2022 submittal, fill isopach and monthly density calculations were provided in Appendix D (attached).

Response 5: The monthly density values have been included in Appendix D.

Comment 6: Please correct flyover date noted in the Report as Feb 15th, 2023 or 2024.

Response 6: Flyover date was corrected to February 15th, 2024

2.5 Waste Compaction Ratios (IMP X.B.3)

Comment 7: See comment 2.2.2 Capacity. Please provide calculation or monthly density values.

Response 7: The monthly density values have been included in Appendix D.

Comment 8: Report states that the “ratio [in-place density (tons/cy)] will be revised as needed after the information from the 2024 aerial survey is completed”. If this is the case, is this statement and ratio calculation still valid?

Response 8: This statement has been removed for clarity. The data was received through the County of Los Angeles Disposal Facility Annual Activity Report (2023) is the most current and up to date as available.

3.1 Complaints and Complaint Resolution (IMP X.B.6, [Q] A.6 and [Q] C.2.b)

Comment 9: The three modified Dust Boss systems were noted as a mitigation measure in the 2022 Annual Report. However, they are not listed in the

current report. Please provide information on the current use or discontinuation of these Dust Boss systems.

Response 9: This section has been updated to reflect all of the odor mitigation measures in effect during 2023. The Dust Boss systems were not noted in the report as the use of these was discontinued, in lieu of the improved and expanded site-wide vapor systems.

Comment 10: Please remove the statement, "Los Angeles County Department of Public Works has indicated it will not enforce the importation of clean soil used for daily cover at the landfill." This statement does not appear to belong in this report or section. Please note that the County reserves the authority to authorize or regulate importation of material per the Conditional Use Permit.

Response 10: The statement has been removed from the final report.

3.2 Citation Summary (IMP X.B.7, [Q] A.6)

Comment 11: Please verify that all violations are reported including the regulation column of the Summary of NOVs Issued from SCAQMD. Per AQMD's NOV summary, at least 6 Rule 403 violations were issued in 2023. However, no Rule 403 violations are noted in the report.

Response 11: All violations listed in this section have been verified. Six (6) Rule 403 violation were also added to this section.

Comment 12: Please include the monetary fines for all violations that occurred in 2023 as available.

Response 12: SCL is currently negotiating fines with SCAQMD for NOVs issued in 2023; none have been paid as of the date of this response.

7.3 Gas-To-Energy (IMP X.B.13, CUP 52, [Q] C.10.c)

Comment 13: Please confirm the total volume of gas sent to the Gas to Energy facility and Landfill Gas Flares. The calculated total volume of gas that was sent to both facilities was nearly identical at 4,763,647,301.00 scf.

Response 13: The monthly totals have been updated based on 2023 data.

Appendix B

Comment 14: Please include or define applicable layers in the key legend, ie fence layer, water surface layer, etc.

Response 14: All applicable layers have been defined and included in Appendix B.

Appendix D

Comment 15: See comment 2.2.2 Capacity. Please include the future operational density assumed in the 5 year fill plan (1670 LBS/cy) in the Report.

Response 15: The monthly density surveys have been included in Appendix D, and a statement indicating the operational density assumed in the 5-year fill plans was included.

Appendix R

Comment 16: Please verify that the total quarterly leachate volumes for 4th Quarter 2023 are tabulated correctly (calculated value is expected to be 3,658,193 gallons, however 2,444,870 gallons is reported).

Response 16: 4th Quarter 2023 leachate volumes have been corrected to 3,658,193 gallons.

LA County Planning Comments

Section 2.2.1

Comment 17: Please provide a summary of the total tonnage of Clean Soil Received/imported to the landfill.

Response 17: A summary of the total tonnage of Clean Soil imported to the landfill has been added to Section 2.2.1.

Section 2.2.2

Comment 18: Please confirm or correct dates highlighted in text below.

Response 18: Dates have been corrected on the final report.

Comment 19: Which Facility permit is being referenced here?

- The calculated remaining air space capacity as of 12/31/2023 is 60,622,363 CY. This volume was calculated by comparing the topographical surface generated during the February 15, 2023, flight to the permitted top of waste surface described in the facility permit documents and subtracting volume associated with the tonnage that was placed from January 1, 2022, to February 15, 2023...

Response 19: This is referencing our Solid Waste Facility Permit (19-AA-2000).

LA County Fire Department Comments

Comment 20. We would like to include this comment:

“We remain committed to ongoing efforts to enhance and implement effective odor control measures at Sunshine Canyon Landfill. Continuous monitoring, the use of advanced odor mitigation technologies, and proactive operational practices are integral to our strategy to minimize odors and improve air quality for the surrounding communities. We will persist in our dedication to employing and refining these measures to ensure compliance with regulatory standards and to address community concerns.”

Response 20: This comment has been included in the comment summary sheet (this document) for visibility to other interested parties.