



MARK PESTRELLA, Director

COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

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March 26, 2024

IN REPLY PLEASE

REFER TO FILE: **EP-5**

Ms. Kate Downey
Environmental Manager
Republic Services, Inc.
Sunshine Canyon Landfill
14747 San Fernando Road
Sylmar, CA 91342-1021

**SUNSHINE CANYON CITY/COUNTY LANDFILL
CONDITIONAL USE PERMIT NO. 00-194-(5)
EXPANDED USE OF ALTERNATIVE DAILY COVER FOR THE WEEKEND PILOT
PROJECT UTILIZING GEOSYNTHETIC PANEL PRODUCT**

Dear Ms. Downey:

Republic Services (Republic) submitted a "Request for Saturday Usage of Envirocover™ Approval" dated January 30, 2024, requesting the use of the Environmental Products, Inc.'s (EPI's) Enviro™ cover as an alternative daily cover (ADC) in lieu of using 6 inches of soil for cover on Saturdays.

Public Works hereby modifies its January 15, 2019, Conditions of Approval Letter allowing Republic to implement the proposed expanded use of ADC as a pilot for a one-year period from the implementation date subject to the Conditions of Approval specified in this letter.

Prior to implementation of the pilot and pursuant to Condition 79 of the CUP, Republic shall notify the Community Advisory Committee, the North Valley Coalition of Concern Citizens, the Granada Hills North Neighborhood Council, the Technical Advisory Committee, and any other interested community groups in the vicinity of the facility of the proposed pilot, its purpose, and objectives, and provide opportunities for the community to comment. Documentation substantiating compliance with this requirement, including community input received, shall be submitted to the County Departments of Regional Planning and Public Works.

Objectives of the Pilot

The objectives of this 1-year pilot are as follows:

- Determine if the geosynthetic panel product material meets the performance requirements of Title 27, Section 20690 to meet the requirements for controlling blowing litter, vectors, fires, scavenging, and odor.
- Determine if the usage of the geosynthetic panel product material has a positive impact on the gas collection and control system and the leachate collection and removal system.

An evaluation of the effectiveness of the geosynthetic panel product will be conducted throughout the 1-year term of the pilot and reported at the conclusion of this 1-year period. Data collected during the pilot period will be used to determine (1) whether the project objectives have been met, (2) if it resulted in the improvement in the landfill gas collection and management system and the leachate collection system, and (3) if it resulted in the reduction of odor nuisance and complaints from the neighboring communities.

General Conditions of Approval

Public Works approves the expanded use of ADC for the Pilot subject to the following conditions:

1. 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.
2. Duration of Pilot Project — 1 year from the date of this letter.
3. Termination — Public Works may terminate the approval of the pilot project at any time, including but not limited to the following causes, as determined by Public Works in its sole discretion:
 - a. Republic has failed to comply with any of the requirements specified herein, including the Evaluation Standards, Program Requirements, and Reporting Requirements as specified.
 - b. Problems arise with the use of the ADC material that cannot be corrected.
 - c. The use of the ADC material does not meet the objectives of the pilot as stated in this letter and the Report.

If at any time during the term of this pilot project Public Works terminates this pilot project approval, Republic shall revert to using 6 inches of soil as daily cover at the Landfill on Saturdays. Public Works may also terminate this approval if Public Works approves another form of daily cover in order to promote best gas management practices and to protect public health and safety.

Evaluation Standards and Program Requirements:

4. 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 Republic’s original proposal. Any proposed change to this ADC material will require prior approval from Public Works.
5. 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 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 2 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. When application of 6 inches of soil is necessary, as described on these conditions of approval, the following will apply:
 - i. There shall be no “peel back” in places where the cover soil has been in place for more than 30 days.
 - ii. The “peel back” operations shall be managed in a manner to minimize odors.

- iii. 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.
- 6. Material Placement — The ADC material shall be placed as follows:
 - a. 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.
 - b. Placement During Rainy/Stormy Conditions — During rainy/stormy conditions, the following operational measures shall be implemented and maintained:
 - 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.
 - c. 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 6 inches of soil, which shall

be kept in place at the beginning of the next operating day. Republic may peel back the soil cover as described in item 5b.

Reporting Requirements:

7. Performance Requirements — In order to determine the effectiveness of the ADC material, the ADC material shall be evaluated in accordance with the performance requirements and standards set forth in CCR Title 27, Section 20690 and 20695, respectively. Evaluation of performance criteria shall be conducted as follows:
 - a. Vector
 - i. Threshold values for vector populations shall be established prior to the commencement of the ADC pilot project. Based on these threshold values, daily inspection of vector populations shall be recorded in accordance with the recording requirements specified in CCR Title 27, Section 20690(a)(1)(D).
 - ii. Any vector infestation shall be recorded in the Monthly Reporting Requirements stipulated herein, and controlled immediately upon observation. If infestation cannot be controlled, the use of the ADC material shall be ceased and be replaced with 6 inches of soil as daily cover.
 - b. Fire
 - i. Any burning material, or any solid waste that has the potential to cause fire, shall not be disposed of at the Working Face and shall not be covered with the ADC material. Procedures for handling such materials or solid waste shall be subject to the requirements specified in CCR Title 27, Section 20695(b).
 - ii. Any fire incidents, or relocation of any burning material or any solid waste that has the potential to cause fire, shall be recorded in the Monthly Reporting Requirements stipulated herein.
 - c. Litter
 - i. The operator shall control windblown litter from the operating day's Working Face.
 - ii. If wind conditions are too extreme for the ADC material to remain intact once applied and all operational adjustments as described in Condition

7 have been proven to be ineffective, the operator shall cease the application of the ADC material and replace it with 6 inches of soil for cover until such time as conditions permit the use of the ADC material.

- d. Scavenging
 - i. No scavenging activities shall be allowed.
 - ii. Any scavenging activities shall be reported to the operations manager and appropriate action must be taken.
- e. Odor
 - i. Daily visual observation of the Working Face area with photographic evidence of cover placement at the beginning and end of the operational day shall be reported in the Monthly Reporting Requirement.
 - ii. If a conflict exists with the current odor management program(s) as required by other regulatory agencies, the strictest requirements shall govern the use of ADC.
 - iii. If odor sources have been found within the Working Face area, appropriate odor control measures shall be implemented. If the odor persists, Republic may be required to discontinue the use of the ADC material and return to using 6 inches of soil for daily cover.
 - iv. Any potential odor sources from the Working Face shall be recorded in the Monthly Reporting Requirements, and shall include, but not be limited to, the approximate location of the source, time and/or period of the duration of odor, weather condition, and odor control measures taken.
- f. In addition to the above performance criteria, Republic shall also establish a base line for two areas of the site: (1) where 6 inches of soil cover has been applied, and (2) where the ADC material is applied. The following observations shall be made on both areas in order to measure the performance of the pilot project in comparison to the use of 6 inches of soil cover.
 - i. Surface Gas Emissions — Republic shall monitor for any surface gas exceedances, in accordance with the South Coast Air Quality Management District Rule 1150.1.
 - ii. Landfill Gas Collection and Recovery System — Republic shall locate wells impacted by fluid build-up, indicate the amount of fluid that is

pumped-out from the well, and record the vacuum pressure before and after fluid is pumped out.

- iii. Leachate Collection and Recovery System — Republic shall record the amount of leachate that is collected from the sump.
- iv. Public Works reserves the right to add additional criteria that it determines are necessary to evaluate the performance of the ADC at the site.

8. Environmental Monitoring

- a. Republic shall examine the ADC material at the end of each operating day after the Working Face has been completely covered with the ADC material. Any tears, punctures, or unusual observations of the ADC material during its application and/or prior to placing new trash on top of the previous operating day's application of the ADC material, shall be documented and included in the Monthly Reporting Requirements.
- b. Weather data shall also be collected daily and reported in the Monthly Reporting Requirements. Weather data shall include but not be limited to ambient temperature, humidity conditions, wind and speed direction, and rainfall.
- c. Daily observations of vectors, blown litter, fire, and any indication of scavenging shall also be included.

9. Reporting Requirements — Republic shall prepare a monthly report summarizing all monitoring observations and maintenance issues of the ADC pilot project, including but not limited to any tears, punctures, or unusual observations related to the application of the ADC material; any immediate odors detected at the vicinity of the Working Face during and after the application of the ADC material; and any unusual occurrences at the Working Face, such as, fire, vectors, blowing litter, and scavenging. A copy of the daily logs from the monitoring requirements specified in Republic's original proposal and on this letter must also be provided in the monthly report as specified herein. Republic shall submit the monthly reports to Public Works, by the 15th of the subsequent month.

10. Data Analysis — At the conclusion of this ADC pilot project, Republic shall submit a detailed report documenting all of the observations, monitoring data and results, and recommendations for continued use of the ADC material as an ADC for Sunshine Canyon Landfill. Such Data Analysis and Evaluation Report must also include all documentation establishing whether the project's stated objectives have been met.

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11. Conclusions and Results of the ADC Pilot Project — At the conclusion of the ADC pilot project, Public Works will evaluate the Data Analysis and Evaluation Report to determine if the project objectives have been met and will consider the continued modification of the daily soil cover. If the project objectives are met, Public Works, in consultation with the Departments of Regional Planning and Public Health, may allow this expanded use of the ADC material.

If you have any questions, please contact me or Dave 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



EMIKO THOMPSON
Assistant Deputy Director
Environmental Programs Division

DN:kp
P:\SECKP\EP-5\SCL MONTHLY ACTIVITY REPORT LETTER RESPONSE

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, Tim Fargo, Claudia Rodriguez)
Sunshine Canyon Landfill Community Advisory Committee (Wayde Hunter)
Sunshine Canyon Landfill Technical Advisory Committee (Alex Garcia,
Lisa Webber)
Sunshine Canyon Landfill Local Enforcement Agency (Dorcas Hanson-Lugo,
David Thompson)
South Coast Air Quality Management District (Terrance Mann, Victor Yip,
Nick Sanchez)
Each Member of the Los Angeles County Solid Waste Management Committee
Integrated Waste Management Task Force

January 30, 2024

Ms. Emiko Thompson
Los Angeles County Public Works
900 South Fremont Avenue
Alhambra, CA 91803-1331

Subject: Request for Saturday Usage of Envirocover™ Approval

Dear Ms. Thompson:

As you may be aware, Sunshine Canyon Landfill began using Envirocover™ in 2018 as on Mondays through Fridays upon approval from SCL-LEA and LA County Department of Public Works (DPW). The site has been utilizing a full soil cover at the request of LA County DPW on Saturdays since 2022.

When utilizing six inches of compacted soil for daily cover, site personnel must “peel back” the soil layer before placing waste using heavy equipment. This is a standard industry practice which allows “trash to trash” contact, thereby allowing liquids and landfill gas to flow freely, and be collected by the gas collection and control system and leachate collection and removal systems, respectively. During this “peel back” activity which happens in the early morning hours of operation (approximately 6 am to 7 am), waste from the previous day is exposed and can become a potential odor source in unfavorable weather conditions. By contrast, the Envirocover™ material is designed to be left in place during the next day’s placement of waste. As waste is placed on top of the Envirocover™ in the morning hours, a portion of the Envirocover™ remains undisturbed until the inbound traffic necessitates covering more of the area. That is, the working face is able to be kept smaller, and the previous day’s waste is left covered, for a longer period of time.

SCL is committed to reducing and eliminating where possible any potential for odor nuisance to the surrounding communities. We believe the use of Envirocover™ on Saturdays will have a positive effect on potential odors on Monday mornings.

The use of Envirocover™ on Saturdays will also reduce the overall current soil needs of the site. However, we will continue to import soil as needed (and within our current approvals) in order to prioritize the following uses:

- Soil for Front Entrance Berm (and soil for required landscaping and supportive plant growth) for the physical berm to reduce flow of odor, as well as improve the visual barrier at the entrance
- Soil for Improved Grading Techniques (e.g., rough grading, contour grading, etc.) for prevention of erosion (in addition to the revised and approved Wet Weather Preparation Plan)
- Soil for the various Intermediate Cover Enhancements requested by SCL LEA and SCAQMD
- Soil (with higher organic content) for vegetative cover for biofiltration / oxidation of landfill gas emissions
- Soil for stockpiling for emergency conditions (extreme weather conditions) and when ADC cannot be utilized (e.g., very high winds)

Therefore, we respectfully request approval for the use of Envirocover™ on Saturdays.

If you have any questions or need additional information, please do not hesitate to contact me at (816) 521-3112.

Sincerely,



Michael Stewart
General Manager
Sunshine Canyon Landfill

cc via email:
Dave Thompson
Dorcas Hanson-Lugo
David Nguyen

