

January 24, 2025

Mr. David Thompson  
Local Enforcement Agency  
221 N. Figueroa St. Suite 1250  
Los Angeles, CA 90012

**Re: Emergency Waiver of Standards Request, Sunshine Canyon Landfill Permit No. 19-AA-2000.**

On January 7, the City of Los Angeles declared a State of Emergency in response to the Palisades Fire and ongoing windstorm. Similarly, on the same day, the Executive Department of the State of California issued a Proclamation of a State of Emergency.

Pursuant to California State Regulations Title 14, Section 17210 et seq., Sunshine Canyon Landfill (SCL), and SWFP 19-AA-2000 is requesting an Emergency Waiver of Standards to facilitate the receipt of disaster debris from the fires in the Los Angeles region. SCL also anticipates a significant increase in construction and demolition debris and other non-fire debris waste associated with the fires plus remediation and reconstruction efforts. SCL is one of the closest lined landfills to the area of the Palisades fire.

The waiver will enable the site to accept both fire debris and MSW associated with the debris removal and the recovery efforts within the County and City of Los Angeles related to the fires beyond the current permitted inbound tonnage limit of 12,100 tons per day and 66,000 tons per week up to a total of 15,000 tons per day and 90,000 tons per week. Additionally, the site requests the option to increase hours for receipt of waste on Saturdays from 2 pm to 4 pm and on weekdays from 6 pm to 7 pm if incoming volumes warrant this adjustment. The disaster-related material accepted will be limited to what is included in the State Water Resources Control Board Order WQ-2020-0004-DWQ.

Pursuant to Title 14 CCR, Section 17210.3:

1. Minimum Standards Requested to be Waived
  - a. Daily Tonnage Limit: Increase daily tonnage limit to 15,000 tpd
  - b. Weekly Tonnage Limit: Increase weekly tonnage limit to 90,000 tons per week
  - c. Hours of Operation:

- i. Receipt of Refuse: the option to increase SCL's hours for receipt of waste to 4 pm on Saturdays and on weekdays to 7 pm, if incoming volumes warrant either or both adjustments
  - ii. Landfill Operations and Equipment Maintenance: extend hours of landfill operations and equipment maintenance to 10 pm, Monday through Friday
2. Remaining Disposal Capacity
  - a. As of 12/31/24, SCL has approximately 57M cubic yards of remaining capacity
3. SCL is expecting that any separation of potentially reusable or recyclable materials from fire debris will be completed at the point of generation
4. A Listing of Locally Approved Temporary Sites
  - a. Temporarily using sites to store disaster related debris for future reuse or recycling is not requested by SCL at this time.

The following Operations Plan outlines the general procedures of anticipated traffic patterns, filling procedures, and management practices related to dust control with regard to the anticipated disaster-related debris.

#### 1. Traffic and Transport into SCL

Any trucks delivering disaster-related waste (ash, soil and debris) will follow a pre-designated traffic route which will likely bring trucks via the 405 Freeway, exiting onto Roxford Street, to San Fernando Road and into the site. These routes will reduce transport through residential neighborhoods to the extent feasible.

Traffic control personnel will be stationed near the entrance to ensure that trucks delivering MSW (or other non-waste traffic) is designated to a single in-bound lane, and trucks delivering disaster debris are designated to the other single in-bound lane. This will ensure the queuing capacity on-site is maximized to limit queuing on San Fernando Road to the extent feasible.

- i. MSW and non-disaster debris trucks: follow normal traffic pattern, weigh in at the primary (existing) scale house and follow signage and traffic control personnel directions to the working face (CC4 P4A/B/C and/or CC5A). Refer to Figure 1.
- ii. Disaster Debris Trucks: weigh into a scale at the primary (existing scale house) and follow signage and traffic control personnel directions to a designated disaster-debris filling location on the northeast portion of the landfill. If required by the agency overseeing the recovery efforts, or depending on volumes of

material these trucks will follow a designated road to weigh in at a temporary (old) scale location near the administration office. If required, these trucks will return to their weigh-in scale to weigh out and will exit the site with normal trucks. Refer to Figures 1 and 2 for potential fire debris disposal areas, as well as on-site haul routes and scale locations.

## 2. Filling Procedures

It is anticipated that disaster-related material will be delivered to the site in end dumps, "Super-10" trucks, or similar. Traffic controllers and spotters will be positioned around the designated dumping area to direct trucks into the filling area, where they will tip their loads. A dedicated water truck will apply water as needed to suppress the dust during the unloading process.

Envirocover and/or 6" of compacted soil will be applied at the end of each day in accordance with our existing procedures and weekend. The working face of this designated filling area will be covered daily by 9 pm.

## 3. Dust Management Practices

Dust control will remain a top priority. All existing dust control measures will remain in place to manage the normal day-to-day MSW and construction activities on-site. In addition to those measures, two water trucks will be assigned solely to the disaster debris operation including the roadways to and from the designated filling area and within the filling operation.

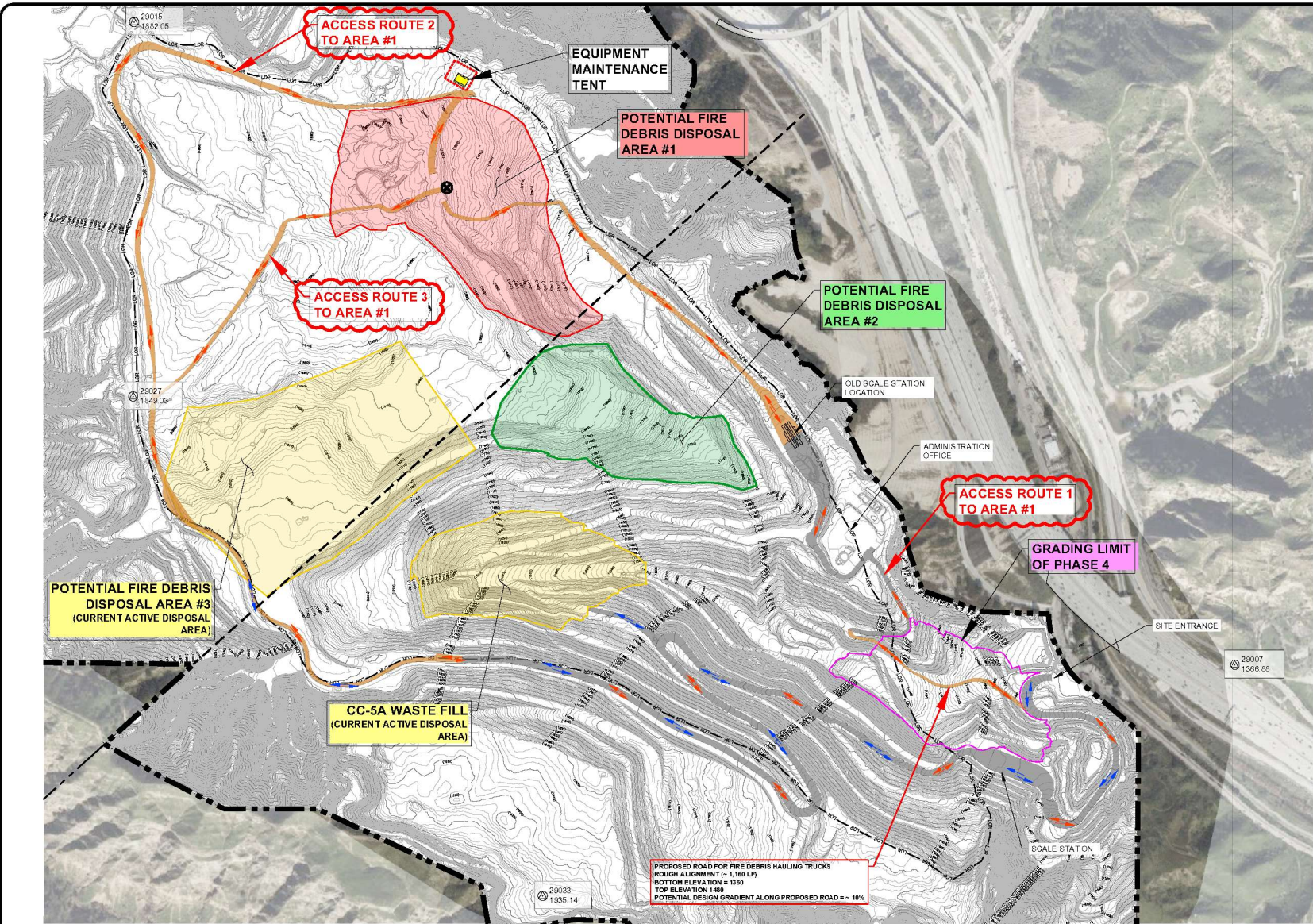
The Plan described above may be modified or adjusted as needed, or as requested by the LEA according to the requirements of the agency overseeing the recovery efforts and/or the LEA Program. Any significant changes to this Plan will be resubmitted to the LEA for review and approval.

Should you have any questions, please don't hesitate to contact me at (210) 889-9516.



Michael Stewart  
General Manager, Sunshine Canyon Landfill



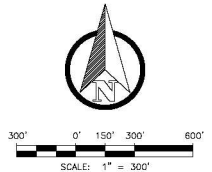


**LEGEND:**

- SUNSHINE CANYON LANDFILL PROPERTY LINE
- PERMITTED LIMIT OF REFUSE
- BENCHMARK SURVEY CONTROL POINT
- PAVED ROADWAY
- COMPACTED AGGREGATE BASE ROADWAY
- TRAFFIC ROUTE TO CURRENT ACTIVE DISPOSAL AREA
- TRAFFIC ROUTE TO POTENTIAL FIRE DEBRIS DISPOSAL AREA
- CENTROID OF AREA #2

OPTIONAL ACCESS ROUTES TO AREA #1	DISTANCE FROM SITE ENTRANCE TO CENTROID OF AREA #1
ACCESS ROUTE 1	6,824 LF
ACCESS ROUTE 2	17,117 LF
ACCESS ROUTE 3	14,570 LF

PROPOSED ROAD FOR FIRE DEBRIS HAULING TRUCKS  
 ROUGH ALIGNMENT (+/- 1,160 LF)  
 BOTTOM ELEVATION = 1260  
 TOP ELEVATION 1460  
 POTENTIAL DESIGN GRADIENT ALONG PROPOSED ROAD = -10%



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REV NO.	DATE	DESCRIPTION	APPROVED BY

DATE OF ISSUE: JAN 2024  
 DESIGNED BY: F. MINA  
 CAD DESIGN BY: J. TAMBA  
 CHECKED BY: F. MINA  
 APPROVED BY: F. MINA



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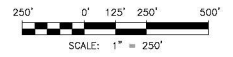
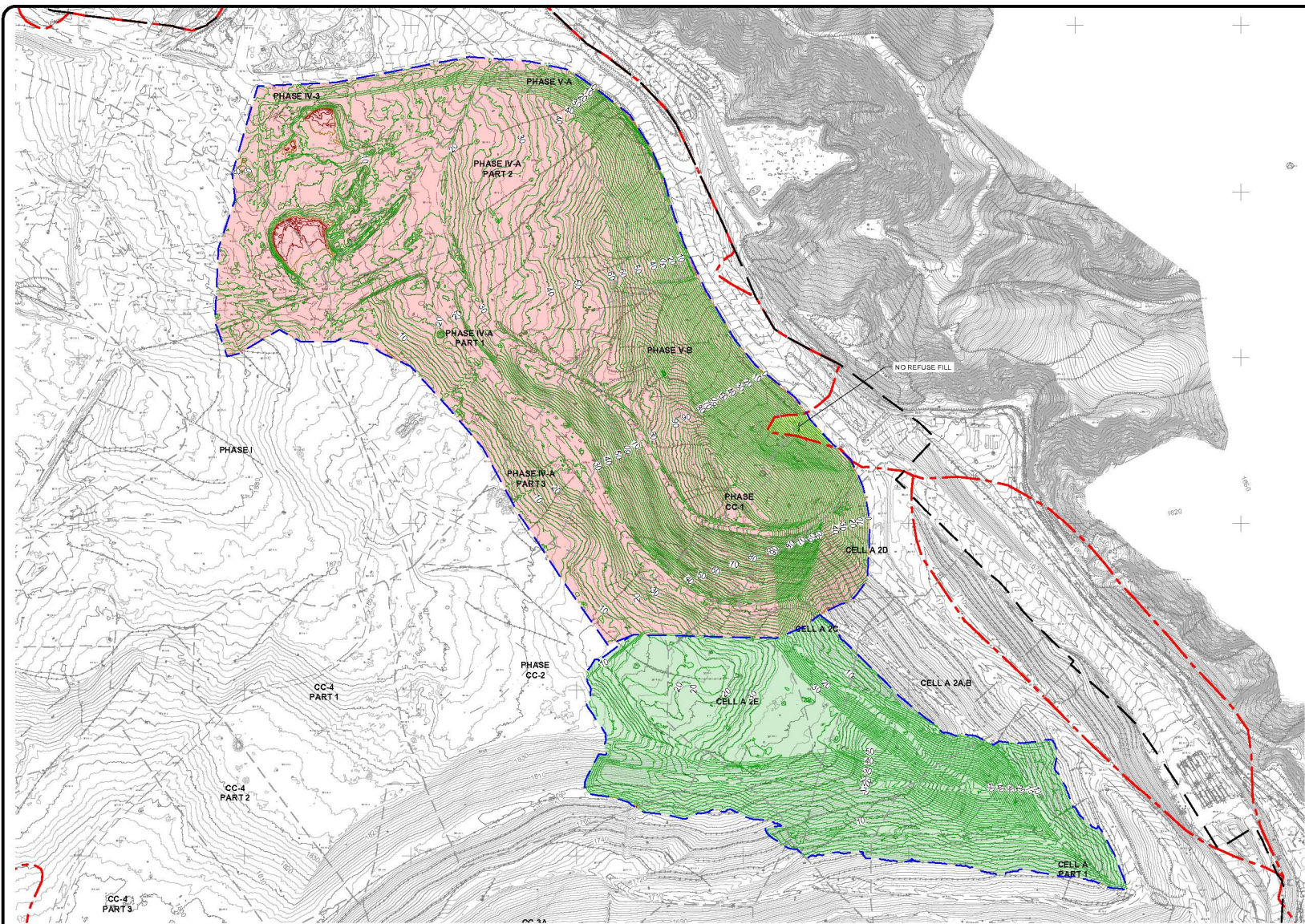
SUNSHINE CANYON LANDFILL  
 SYLMAR, CA  
**OVERALL SITE MAP**  
 POTENTIAL FIRE DEBRIS DISPOSAL AREAS  
 AND ACCESS ROUTES

FIG NO.  
**1.0**  
 PROJECT NO.  
 S024.X

P:\PROJECTS\SUNSHINE\_CNY\_LANDFILL\DISPOSAL AREAS\SC-1-22\DWG January 23, 2023 - 11:42 AM BY: GJA-USER



N:\SUNSHINE CANYON\2025 FIRE DEBRIS LOGISTICS PLANNING\3 - CAD\DWG\150 - FIG 03 - FIRE DEBRIS DISPOSAL - CONCEPTS\_2 (2024-12-20).DWG January 23, 2025 - 2:30 PM BY: GJA-LJSR



**LEGEND**

- PROPERTY BOUNDARY
- CITY/COUNTY LIMITS
- LIMIT OF REFUSE
- LIMIT OF CONSTRUCTED LINER
- CELL SUBAREA LIMITS
- LIMITS OF ATTAINABLE FILL
- EXISTING 10' CONTOUR<sup>(1)</sup>
- EXISTING 2' CONTOUR<sup>(1)</sup>
- ISOPACH 10' CUT CONTOUR
- ISOPACH 2' CUT CONTOUR
- ISOPACH 10' FILL CONTOUR
- ISOPACH 2' FILL CONTOUR
- FIRE DEBRIS DISPOSAL AREA 1
- FIRE DEBRIS DISPOSAL AREA 2
- SOIL PLUG (NO REFUSE FILL)

**QUANTITIES**

FIRE DEBRIS DISPOSAL AREA 1 = 2,364,363 CY  
 FIRE DEBRIS DISPOSAL AREA 2 = 646,838 CY

**NOTES**

1. REFERENCED AERIAL TOPO BASED ON DECEMBER 20, 2024 AERIAL SURVEY BY FIRMATEK, LLC.
2. ISOPACH CREATED BY COMPARING DECEMBER 20, 2024 TOPOGRAPHY TO THE CC-1 FILL PLAN, CC-3B PART 1, AND CC-4 PART 4B&C MASTER FILL PLANS.

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ISSUED FOR REVIEW

REV. NO.	DATE	DESCRIPTION	APPROVED BY

DATE OF ISSUE: 01/23/2025  
 DESIGNED BY: CB  
 DRAWN BY: JB  
 CHECKED BY: CB  
 APPROVED BY: CB



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SUNSHINE CANYON LANDFILL  
 POTENTIAL FIRE DEBRIS DISPOSAL  
 SYLMAR, CALIFORNIA

CONSTRUCTED REMAINING AIRSPACE

FIG. NO.  
**2**

PROJECT NO.  
**90241287**