1.0 INTRODUCTION

This report covers operations of the Sunshine Canyon Landfill (SCL) for the 2024 calendar year (January 1, 2024, through December 31, 2024). It has been prepared to comply with annual reporting requirements specified in two distinct land use permits: the Implementation and Monitoring Program (IMP) mandated by Conditional Use Permit (CUP) Number 00-194-(5), issued by the County of Los Angeles, and the Conditions of Approval mandated by Los Angeles City Council Zone Change 98-0184 (ZC/GPA) (MPR).

SCL, located in City of Sylmar, California is governed by two separate land use permits because the facility previously operated as two distinct units. One portion of the landfill is located in the City of Los Angeles' jurisdiction, and one portion is located in unincorporated Los Angeles County. In late 2008, revised Solid Waste Facilities Permit and Waste Discharge Requirements were issued to allow operation of a combined City/County operation. Beginning January 1, 2009 recordkeeping and reporting requirements were changed to reflect this joint operation.

The land use permits remain in place and are unchanged under the joint operation. Since 2009, the requirement for an annual report has been fulfilled by the submittal of a joint City/County Annual Report which addresses the requirements of both land use permits. References to permit requirements are included in each section heading.

1.1 Mitigation Monitors ([Q] A.7)

The following table lists contractors that performed the mitigation monitoring in 2024, the type of mitigation monitoring activities each firm conducted and the timeframe these activities are required to be performed.

Vendor Name & Address	Mitigation Monitoring	Phase of Intervention (Pre-Construction, Construction, Operation, Closure or Post Closure)
Geo-Logic Associates 2777 E. Guasti Road, Ontario, Ca. 91761	Groundwater Monitoring	Pre-Construction, Construction, Operation
Chronicle Heritage/Paleowest 2025 N 3rd St #157, Phoenix, AZ 85004	Archeology, Paleontology, Biology & Vegetation	Operation/Construction (on-call)

RES Environmental 865 Via Lata, Colton, Ca. 92324	Air Emissions Testing & Wind Monitoring	Operation
Weaver Consultants 101 Main St Suite 220, Huntington Beach, CA 92648.	Odor Mitigation	Operation

2.0 LANDFILL CONSTRUCTION AND OPERATIONS

2.1a Off- Hour Operations ([Q] B.3.e)

Environmental mitigation and emergency operations that cannot be accomplished during the normal working hours may be performed at any time, per Condition [Q] B.3.e. These activities require disclosure in the annual report.

Current allowable hours for the various activities are as follows:

Activity	Description	Permissible Hours
Receipt of Refuse	Scale Operation	6am to 6pm, Monday through Friday 7am to 2pm Saturday (Except for City post-holiday requirements)
Landfill Operations	Disposal preparation, Cover application, waste placement, except processes that require full time operation such as the gas collection and control system.	6am to 9pm Monday through Saturday
Equipment Maintenance	Activities required ensuring proper operation of equipment to support the landfill activities.	4am to 9pm Monday through Saturday (No diesel vehicle shall be started before 5am)
Environmental Mitigation and	Measures necessary to avoid environmental impacts, which cannot be	Any time, shall be noted in annual report.

Emergency Operations	accomplished during normal operating hours.	

There were eight (8) instances of environmental mitigation and emergency operations that took place outside the permitted hours for operations, site preparation and equipment maintenance during 2024. These occurrences were reported to the Local Enforcement Agency (LEA) via the Special Occurrence Log procedure:

Thursday, January 4, 2024: SCL team notified the LEA that closing activities would continue past normal operating hours due to delays during closing activities. All trash was covered, and equipment was parked by 10:04PM.

Monday, January 22, 2024: SCL team notified the LEA that closing activities would continue past normal operating hours due challenging conditions caused by the rain. All trash was covered, and equipment was parked by 9:27PM.

Monday, February 5, 2024: SCL team notified the LEA that closing activities would continue past normal operating hours due to delays during closing activities. All trash was covered, and all equipment was parked by 9:20PM.

Tuesday, February 6, 2024: SCL team notified the LEA that closing activities would continue past normal operating hours due to delays during closing activities and inclement weather. Closing activities finished approximately around 11:50PM.

Wednesday, February 7, 2024: SCL team notified the LEA that closing activities would continue past normal operating hours due to delays during closing activities and inclement weather. Closing activities finished approximately around 10:50PM.

Tuesday, February 13, 2024: SCL team notified the LEA that closing activities would continue past normal operating hours due to delays during closing activities. All trash was covered, and all equipment was parked by 9:22PM.

Saturday, April 6, 2024: SCL team notified the LEA that closing activities would continue past normal operating hours due to delays in closing activities. All trash was covered, and all equipment was parked by 10:00PM.

Tuesday, July 23, 2024: SCL team notified the LEA that closing activities would continue past normal operating hours due to delays in closing activities. All trash was covered, and all equipment was parked by 9:44PM.

2.2 Waste Disposal, Capacity, and Fill Sequencing

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

The total tonnage of municipal solid waste (MSW) received for disposal at Sunshine Canyon Landfill during 2024 is shown on the following table:

Time Period	Landfill Designation	Waste Disposal (tons)	Waste Disposal in (Cubic yards (CY) compacted, assuming 1,595 lbs/CY)
1/1/2024 - 12/31/2024	Joint City/County Landfill	2,516,880.45	3,154,122.32

The daily and monthly tonnage of waste received and disposed of at the facility are provided in Appendix A.

The limit for the combined City/County operation is 12,100 tons per day and 66,000 tons weekly, with a maximum weekly limit of 6,600 tons of inert/exempt materials as defined in the Q-conditions. There were no exceedances of these tonnage limitations in 2024 (Appendix F).

Beneficial use materials are solid wastes that have been source-separated or processed and are effectively put to a beneficial use at the facility. Concrete and asphalt rubble may be mixed with soil and used for road base, wet-weather tipping areas or other on-site construction projects. The total amount of beneficial reuse material received in 2024 was 71,299.65 tons.

White goods are infrequently dropped off at the landfill. These materials are not disposed of onsite. Most of these items are segregated by landfill employees and set aside for a licensed contractor to remove them from the site.

A comparison of tonnage of beneficial reuse material, recycling (greenwaste) material and recycling (white goods) material for 2023 and 2024 is provided in the following table:

SUNSHINE CANYON Landfill

14747 San Fernando Road
Sylmar, CA 91342

BENEFICIAL REUSE AND RECYCLING TONS
2023-2024 COMPARISON

	BENEFICIAL REUSE (tons)		RECYCLING - GREENWASTE (tons)		RECYCLING - WHITE GOODS (tons)	
MONTH	2024	2023	2024	2023	2024	2023
January	2,301.12	1,919	0.00	0.00	0.00	0.00
February	2,447.63	2,179	0.00	0.00	0.00	0.00
March	6,455.82	4,430	0.00	0.00	0.00	0.00
April	6,343.38	5,214	0.00	0.00	0.00	0.00
May	6,287.85	6,943	0.00	0.00	0.00	0.00
June	5,655.36	9,041	0.00	0.00	0.00	0.00
July	6,029.96	6,831	0.00	0.00	0.00	0.00
August	11,265.34	4,456	0.00	0.00	0.00	0.00
September	10,932.46	5,147	0.00	0.00	0.00	0.00
October	4,622.70	4,221	0.00	0.00	0.00	0.00
November	4,307.21	4,448	0.00	0.00	0.00	0.00
December	4,650.92	3,966	0.00	0.00	0.00	0.00
TOTAL	71,299.75	58,798	0.00	0.00	0.00	0.00

As shown, the tonnage of beneficial reuse material increased from 2023 to 2024. Generally, the tonnage of this material received is dependent on market availability and site needs. The tonnage of green waste material had no change from 2023 to 2024. The tonnage of white goods had no change from 2023 to 2024; these items are brought to the landfill by the general public, stored and taken off-site by a licensed contractor for recycling.

Below is a Monthly Summary of Clean Soil to be used for daily cover that was imported during 2024.

Month	Clean Soil (tons)
January	65,456.24
February	16,147.34
March	31,234.67

April	51,070.02
May	45,514.82
June	34,874.13
July	23,367.15
August	15,102.52
September	19,380.96
October	15,457.72
November	3,594.65
December	11,178.26
Total:	332,378.48

2.2.2 Capacity (IMP X.B.1)

The 2024 annual aerial survey and topographic mapping for Sunshine Canyon Landfill was conducted on November 20, 2024. The aerial survey is included in Appendix B.

Based on the information generated from the 2024 annual aerial survey, the following information has been calculated:

Remaining Capacity as of 12/31/24	59,231,713 CY
Remaining Capacity as of 12/31/24 (using 1,500 lbs/CY)	44,423,785 tons
Percent of total available capacity available	34.4%

The remaining life depends on the rate of disposal and airspace utilization factor, which is variable dependent on operational practices, rate of waste settlement, and other factors. The achieved density reported for 2024 of 1,595 lb/CY (Section 2.2.1) is slightly higher than the projected airspace utilization rate of 1,500 lb/CY as shown in the table above and occasionally this difference will produce sensitivities to the overall projected site life on an annual basis as reported herein. Despite variations to survey dates, annual densities and the effects of settlement, the total landfill volume subject to the Annual Report (remaining plus consumed), does not change for the site and remains consistent at 172,176,686 CY.

The calculated remaining air space capacity as of 12/31/2024 is 60,622,363 CY. This volume was calculated by comparing the topographical surface generated during the November 20, 2024, 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 November 21, 2024, to December 31, 2024. In this manner, we were able to provide a remaining air space capacity as of December 31, 2024.

Annual achieved densities will change year to year; therefore, the year over year consumed airspace comparison will not typically be a linear depletion. Other factors that are considered include the previous year's waste settlement, soil usage and operational densities achieved. The total site permitted capacity in cubic yards does not change, and projections of remaining capacity are based on comparison of the landfill surface for a given aerial flight to the permitted final grading plans.

The operational density reported for 2024 is calculated by taking an average of the monthly density calculations in 2024, which are an analysis of the change in volume between the flight dates each month, and the tonnage disposed between those two flight dates. This calculation includes soil and ADC in the areas indicated as landfilled. An estimated operational density assumed in the 5-year fill plan of 1,595 lbs/cy was utilized (Appendix D).

2.2.3 Fill Sequencing (IMP X.B.1)

A drawing showing the areas used for waste disposal in 2024 is included in Appendix C. This drawing uses the current aerial topographic map which has been generated from the aerial survey conducted on November 20, 2024. As shown on the drawing, an elevation of 1,895.3 feet above mean sea level (MSL) is shown as the maximum waste elevation on the County portion of the landfill.

2.3 Landfill Survey (IMP X.B.2)

The most recent landfill survey is based on the annual aerial survey conducted on November 20, 2024. The landfill survey topographic map is included as Appendix B and has been prepared in accordance with requirements provided by the Los Angeles County Department of Public Works.

2.4 Grading ([Q] C.4)

All grading performed in 2024 was within the existing limits of grading as shown on the figure included in Appendix C.

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

SCL uses procedures and equipment to maximize the compaction of waste while it is being placed at the landfill. Waste is typically placed in two-foot lifts and is compacted with at least 3 to 4 passes with an 836H Caterpillar compactor or similar. Each compactor weighs approximately 118,000 lbs and can process approximately 150-200 tons of trash per hour. Depending on the rate of incoming waste, the site can have up to 6 compactors working at the same time. Trash is also continuously worked throughout the working day with the equipment for greatest possible compaction.

SCL strives for an achieved ratio of weight to volume ratio of approximately 1500 lbs/cy average in-place density. After the waste has been placed, density increases as more waste is placed on top, and as the waste breaks down over time.

In-place density information presented in the County of Los Angeles Disposal Facility Annual Activity Report (2024), (https://dpw.lacounty.gov/epd/swims/) for landfills in Los Angeles County is provided as a comparison to the ratio for Sunshine Canyon Landfill in the table below.

Site	In-Place Density (Tons/CY)
Calabasas Landfill	0.59 (2024 Report)*
San Clemente Landfill	0.13 (2024 Report)*
Savage Canyon (Whittier) Landfill	0.00 (2024 Report)*
Sunshine Canyon Landfill	0.82 (2024 Report)**
Chiquita Canyon Landfill	1.0 (2024 Report)*

* Units were corrected to tons/cy due to units being misreported in the 2024 County of Los Angeles Disposal Facility Annual Activity Report as lbs/cy.
** Value converted from lbs/cy as reported in the 2024 County of Los Angeles Disposal Facility Annual Activity Report to Tons/cy.

The operational density reported for 2024 is calculated by taking an average of the monthly density calculations in 2024, which are an analysis of the change in volume between the flight dates each month, and the tonnage disposed between those two flight dates. This calculation includes soil and ADC in the areas indicated as landfilled.

2.6 Diversion, Recycling and Prohibited Wastes (IMP X.B.5, CUP 28, [Q] B.5.c)

Information for alternatives to disposal for loads of construction debris is provided to customers upon request.

Asphalt is taken to be used for wet weather decking and road base as needed. Asphalt is stockpiled and stored at designated areas of the landfill.

Customer loads are identified at the scale house. At that point, the truck either is routed to the working face to have their load buried, or, if the load is identified for beneficial reuse, the truck is sent to a staging area, and the material stockpiled to be reused at a later date.

The current measures employed at the site to divert material from disposal meet the intent of CUP Condition 28, are in alignment with other waste management facilities, and are effective in diverting material from disposal.

The site is permitted to accept Class III municipal non-hazardous solid waste and inert /exempt materials except as restricted by Condition 28 of the CUP:

"Prohibited Waste

a. "The following types of waste shall constitute prohibited waste and shall not be received nor disposed of at the Facility: incinerator ash; sludge; radioactive material; hazardous waste, as defined in Title 22, Section 66261.3 of the California Code of Regulations; medical waste, as defined in section 117690 of the California Health & Safety Code; liquid waste, as defined in Title 27, section 20164 of the California Code of Regulations…"

The City land use approval lists the following restrictions in [Q] Condition B.5.a, of the Conditions of Approval:

"Prohibited Waste

b. Incinerator ash, sludge, radioactive material, hazardous waste, and medical waste as defined in Section 25023.2 of the California Health & Safety Code shall not be accepted…"

Unacceptable waste is identified through the waste load-checking program, spotters at the working face, and by the use of radiation detection devices. Through the site's Intensive Load Check program, unacceptable items are identified, removed from the working face and returned with the disposal drivers. Spotters also successfully identify and remove unacceptable items which are then stored on-site in a

designated area. Documentation regarding the types and quantities of unacceptable materials are kept on site and a summary of the information is provided in the monthly LEA reports. The summary tables for the load check manifests are provided in Appendix I. The data constituting the Manifest for Radioactive Wastes is found on the Radiation Special Occurrence Logs found in Appendix J. Any prohibited waste that was inadvertently accepted by Sunshine Canyon Landfill resulted in the site notifying the appropriate agencies:

> On Monday 8/5/24 at approximately 6:30 AM, SCL received a load of treated medical waste from Stericycle. When the load of treated medical waste was tipped at the landfill, our spotter observed human body parts (limbs), but did not immediately report the observation to supervisory staff. The treated medical waste, including the human body parts, were placed in the landfill's working face. Initially, it was unclear what was observed until the employee could be interviewed more thoroughly on Wednesday (8/7) morning. Based on the interview, it was determined that the human body parts had been buried.
>
> Immediately after confirming this information with the employee who made the observation, SCL suspended Stericycle from delivering material to SCL until further investigation could be performed on the root cause of the incident.
>
> Meanwhile, the SCL supervisory team provided additional in-person training to all operators and spotters on the topic of special occurrences. It has been reiterated and emphasized that any visual observation of human bodies parts, or other suspect material within the loads, should be immediately reported to supervisory personnel and the working face should receive no additional loads and/or be roped off/isolated from the rest of the working face until the material can be inspected further.
>
> Based on information provided by Stericycle, their management team conducted an internal root cause analysis and identified the compactor containing the improperly packaged waste. They were able to confirm that the waste had been treated through an autoclave process. Using their chain of custody, Stericycle also identified the customer(s) whose treated medical waste was processed during the time the compactor bin in question was in use and worked with their team to notify all customers with material contained in the bin of their waste acceptance policies. Stericycle has also

advised that they make training and education material available to their customers on their policies both online, and in webinar form.
Once Stericycle completed their root cause analysis and determined that the material received on 8/5 was treated, SCL resumed accepting Stericycle waste on 8/17. Additional practices have since been incorporated into our acceptance of Stericycle loads, which includes enhanced communication from the scalehouse to the spotters regarding incoming Stericycle loads and an additional visual inspection from both spotters and landfill supervisors prior to pushing the loads.

As this incident developed, SCL made notifications to the SCL-LEA, LA County Department of Public Works, the LA Regional Water Quality Control Board, the California State Department of Public Health, the City of Vernon Department of Public Health, and the Department of Toxic Substances Control. With the exception of the requested updates to the Load Check Program, no additional action has been required by any of the agencies listed above. While this load was determined to be acceptable treated medical waste, it is included in this section due to the notice that was provided to the agencies above.

On February 14th, 2025, as SCL staff were finalizing the Second Semi-Annual Groundwater Monitoring Report for 2024, it was identified that one soil generator's Special Waste profile, which was approved July 24, 2024, did not meet the Waste Acceptance Requirements of the Amended WDRs and the site-specific WAP. SCL inadvertently accepted approximately 100 cubic yards of soil for disposal in a lined cell, from a generator in which thresholds for lined cell disposal were nominally exceeded for three semi-VOC constituents. The nominal exceedances and small volume of soil accepted are not expected to have an impact on the landfill, and the material is still considered non-hazardous. However, immediately upon recognizing this inadvertent error, SCL staff notified the appropriate regulatory agencies, and began actively conducting an internal investigation to establish corrective action to ensure this type of occurrence does not happen again in the future.

It was determined that a three-page Republic Services Special Waste profile form, numbered 5123-24-10959, and supporting laboratory analysis was submitted for review to the Special Waste Department. The results from each of the two samples representative of diesel fuel contaminated soil was cross-referenced against the 662 contaminants representing Volatile and Semi-volatile Organic Contaminants, Toxic Metals, Organochlorine Pesticides,

Polynuclear Aromatic Hydrocarbons, Polychlorinated Biphenyls, and other constituents that are listed in the Sunshine Canyon Waste Acceptance Plan (WAP). Although three contaminants from representative sample S1 exceeded their landfill acceptance criteria of 2.9 mg/KG: Benz[a]anthracene reported 11.2 mg/KG; Benzo[b]fluoranthene reported 11.4 mg/KG; and Indeno(1,2,3-cd)pyrene reported 3.44 mg/KG, through human error on the part of the Special Waste Analyst, the profile was approved for acceptance.

To prevent future recurrence, the Special Waste reference materials will be updated to better organize the contaminant levels and highlight the importance of cross-referencing all potential contaminants listed in the WAP, including non-RCRA regulated/non-state regulated constituents. Retraining of the analysts that review profiles destined for Sunshine Canyon Landfill will be conducted.

No other instances of prohibited was acceptance occurred in 2024.

3.0 COMPLAINTS AND CITATIONS

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

A 24-hour hotline is maintained to receive calls from the public regarding the site: (800) 926-0607. This phone number is located on a sign at the entrance to Sunshine Canyon, is listed on the home page of SCL's website (www.sunshinecanyonlandfill.com), and is published in the Quarterly Newsletter.

Most callers request information regarding the hours of operation, request tours, types of waste accepted, and gate fees. The hotline also receives compliment and complaint calls. Additionally, some calls are received on the general phone number for the landfill.

SCL site personnel continue to implement odor control mitigation measures. All the odor mitigation measures described below were in effect in 2024 without disruption.

- To eliminate the potential contribution of odors from loads carried by transfer trucks, site supervisors patrol areas close to the site where transfer trucks have been observed parking to wait for the site gates to open. If a transfer truck or any other waste truck is observed parking within a 5-mile radius of the site, they are reminded of the site's policy, told to leave the area, and banned from

entering the site for the day. Repeat offenders are reported to the hauling company and the drivers are banned from entering the site for a week.

- Procedures for the handling and management of odorous loads at Republic-operated transfer stations have been developed and the Operations Supervisors at the transfer stations have been trained on the procedures. These procedures involve identifying odoriferous loads at the transfer stations and notifying SCL personnel when these loads are coming into the site so they can be properly managed. The procedures also call for not accepting the loads if they are deemed too odorous to be handled at SCL.

- The procedures for the management of odorous loads at the site have been developed and the site scale house operators have been trained on these procedures. The procedures include identifying loads that register a '4' on SCAQMD's odor classification scale and notifying the site supervisor on duty so the load can be immediately taken to the working face, deposited, and covered with a layer of soil. As indicated previously, loads will not be accepted if they are deemed too odorous to be handled at SCL.

- The procedures for minimizing odors and emissions during installation and trenching of vertical wells and horizontal collectors were initially developed in 2011 and have been modified to include new technologies and process adjustments to enhance effectiveness. These procedures are being followed by all SCL contractors when they are performing work that involves the installation of wells and/or trenching for the installation of horizontal collectors. These procedures remained in effect throughout 2024.

- Aggressive landfill gas well tuning strategy for enhanced extraction.

- Additional dewatering pumps installed at wells with liquids.

- Two mobile water trucks spray down freshly dumped MSW with an odor mitigating surfactant foam.

- Construction of a new cell, CC-5A, utilizing a bottom-up liquid capture system to mitigate odors that may stem from any liquids generated in the waste mass.

- Three portable fan trailers, referred to as Odor Domes, were placed and operated throughout 2024.

  - These units are operated on a continuous basis unless there are maintenance issues.

- Seven Buffalo Monsoon units were in place and operational in 2024.

- The stationary vapor misting systems were operational in 2023 and were operated on a continuous basis unless there were maintenance issues.

- SCL deploys a daily Odor Patrol that begins at 5 AM with pre-operational inspection on-site and continues at 6 AM to monitor odors on site and in the neighboring communities. Odor patrol members conduct patrols in 3 areas of the Granada Hills neighborhood south and southeast of the site and one area of the Sylmar Neighborhood north of the site. The specific monitoring locations have been determined based on review of historical complaints made to SCAQMD.

Approval of the Alternative Daily Cover Pilot Project

In a letter dated January 15, 2019 (Appendix K), the Los Angeles County Department of Public Works issued an approval of the use of the geosynthetic panel product as ADC and the cessation of the pilot project, which was reported for a third year from October 1, 2017, to August 31, 2018, after review of the "Evaluation of Alternative Daily Cover (ADC) Using Geosynthetic Panel Product" (Appendix L). The monthly ADC reports ended on December 31, 2018.

Since the end of the original pilot program in 2018, SCL had requested an expansion of the program to utilize ADC on Saturdays as well as throughout the week. In a letter dated, August 7th, 2024 (Appendix K), the Los Angeles County Department of Public Works approved the expansion of the pilot program. ADC has been used at SCL on the weekends starting on August 10th, 2024. As part of the approval conditions SCL submits monthly reports to the Department of Public Works, the first of which was submitted on September 15th, 2024. The expanded pilot program will run for 1 year, at which a SCL will submit a detailed report documenting all observations, monitoring data, results, and recommendations for continued use of the ADC.

Complaints regarding litter, noise, fugitive dust, odor, or other matters received during the reporting period are summarized in Appendix O. There were 16 complaint calls made to the landfill's 24-hour hotline in 2024. The calls were regarding either litter, noise, or fugitive dust.

SUNSHINE CANYON Landfill
14747 San Fernando Road
Sylmar, CA 91342

A summary of the calls received by the site's hotline is provided as follows:

Month	Odor Complaints Called in to SCL's Hotline	Description of Call
January	0	-Customer called on 1/13 for information.
February	8	-Local resident called on 2/11: reported strong odors. -SCAQMD inspector called on 2/15: no details given. -Customer called on 2/19 for information - (4) Local residents called on 2/24: reported strong odors. - (2) Local residents called on 2/24: reported strong odors.
March	0	-Customer called on 3/1 for information. -Customer called on 3/14 for information. -Customer called on 3/20 for information.
April	0	-Customer called on 4/16 for information. -Customer called on 4/22 for information.
May	0	-Customer called on 5/2 for information.
June	0	-Customer called on 6/1 for information.
July	0	-Customer called on 7/5 for information. -Customer called on 7/8 for information. -Customer called on 7/12 for information. -Customer called on 7/18 for information. -Customer called on 7/24 for information.
August	2	- Customer called on 8/19 for information. - Local resident called on 8/26: reported strong odors. - Local resident called on 8/30: reported strong odors.
September	4	- Unknown called: left no information - (3) Local resident called on 9/6: reported strong odors. - Local resident called on 9/8: reported strong odors. - Customer called on 9/23 for information. - Customer called on 9/27 for information.
October	0	- Customer called on 10/8 for information. - Customer called on 10/18 for information. - Customer called on 10/19 for information. - Customer called on 10/23 for information.
November	0	- Customer called on 11/10 for information.
December	0	- Customer called on 12/29 for information. - Customer called on 12/5 for information. - Customer called on 12/2 for information.

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

A summary of all citations received in 2024 is provided in Appendix P.

Sixty-seven (67) Notices of Violation (NOVs) were issued by the South Coast Air Quality Management District (SCAQMD) (Appendix P). Six (6) Notice of Violation (NOVs) were issued by the LEA. One (1) Notice of Violation was issued by the Los Angeles Bureau of Sanitation. One (1) Notice of Violation (NOVs) was issued by Los Angeles Regional Water Quality Control Board. One (1) Notice of Violation was issued by the California Air Resource Board.

SCL is currently negotiating fines for all violations that occurred in 2024.

SUMMARY OF NOVs ISSUED FROM SCAQMD – 2024

NOV	Violation Date	Regulation	Violation Type
P75300	1/9/2024	SCQAMD Rule 402; CA H&S Code 41700	For discharging such quantities of air contaminants to cause injury, nuisance, or annoyance to a considerable number of persons.
P80851	1/10/2024	SCQAMD Rule 402; CA H&S Code 41700	For discharging such quantities of air contaminants to cause injury, nuisance, or annoyance to a considerable number of persons.
P80852	1/12/2024	SCQAMD Rule 402; CA H&S Code 41700	For discharging such quantities of air contaminants to cause injury, nuisance, or annoyance to a considerable number of persons.
P80001	1/16/2024	SCQAMD Rule 402; CA H&S Code 41700	For discharging such quantities of air contaminants to cause injury, nuisance, or annoyance to a considerable number of persons.
P80002	1/18/2024	SCQAMD Rule 402; CA H&S Code 41700	For discharging such quantities of air contaminants to cause injury, nuisance, or annoyance to a considerable number of persons.
P80003	1/19/2024	SCQAMD Rule 402; CA H&S Code 41700	For discharging such quantities of air contaminants to cause injury, nuisance, or annoyance to a considerable number of persons.
P80004	1/26/2024	SCQAMD Rule 402; CA H&S Code 41700	For discharging such quantities of air contaminants to cause injury, nuisance, or annoyance to a considerable number of persons.
P75299	1/29/2024	SCQAMD Rule 402; CA H&S Code 41700	For discharging such quantities of air contaminants to cause injury, nuisance, or annoyance to a considerable number of persons.

P80853	1/30/2024	SCQAMD Rule 402; CA H&S Code 41700	For discharging such quantities of air contaminants to cause injury, nuisance, or annoyance to a considerable number of persons.
P80810	2/5/2024	SCQAMD Rule 402; CA H&S Code 41700	For discharging such quantities of air contaminants to cause injury, nuisance, or annoyance to a considerable number of persons.
P80006	2/6/2024	SCQAMD Rule 402; CA H&S Code 41700	For discharging such quantities of air contaminants to cause injury, nuisance, or annoyance to a considerable number of persons.
P80856	2/9/2024	SCQAMD Rule 402; CA H&S Code 41700	For discharging such quantities of air contaminants to cause injury, nuisance, or annoyance to a considerable number of persons.
P75297	2/10/2024	SCQAMD Rule 402; CA H&S Code 41700	For discharging such quantities of air contaminants to cause injury, nuisance, or annoyance to a considerable number of persons
P79537	2/11/2024	SCQAMD Rule 402; CA H&S Code 41700	For discharging such quantities of air contaminants to cause injury, nuisance, or annoyance to a considerable number of persons
P80858	2/12/2024	SCQAMD Rule 402; CA H&S Code 41700	For discharging such quantities of air contaminants to cause injury, nuisance, or annoyance to a considerable number of persons
P80859	2/13/2024	SCQAMD Rule 402; CA H&S Code 41700	For discharging such quantities of air contaminants to cause injury, nuisance, or annoyance to a considerable number of persons
P80513	2/14/2024	SCQAMD Rule 402; CA H&S Code 41700	For discharging such quantities of air contaminants to cause injury, nuisance, or annoyance to a considerable number of persons
P80860	2/15/2024	SCQAMD Rule 402; CA H&S Code 41700	For discharging such quantities of air contaminants to cause injury, nuisance, or annoyance to a considerable number of persons.
P80008	2/16/2024	SCQAMD Rule 402; CA H&S Code 41700	For discharging such quantities of air contaminants to cause injury, nuisance, or annoyance to a considerable number of persons
P80009	2/21/2024	SCQAMD Rule 402; CA H&S Code 41700	For discharging such quantities of air contaminants to cause injury, nuisance, or annoyance to a considerable number of persons
P80862	2/22/2024	SCQAMD Rule 402; CA H&S Code 41700	For discharging such quantities of air contaminants to cause injury, nuisance, or annoyance to a considerable number of persons
P80864	2/23/2024	SCQAMD Rule 402; CA H&S Code 41700	For discharging such quantities of air contaminants to cause injury, nuisance, or annoyance to a considerable number of persons
P81007	2/25/2024	SCQAMD Rule 3002; ©(1)	Failure to keep equipment maintained and in good operating condition at all times; Failure to report emissions for CO, NOx, PM10, and Sox; Failed to report emissions for CO, NOx, and SOx per approved Rule 1150.1 Compliance Plan and Rule 1150.1; Failed to report

			emissions for CO, NMOC, PM, PM10, and Sox; Failed to maintain and operate equipment to ensure compliance with emission limits specified in the Facility Permit to Operate; Failed to comply with all regulatory requirements and all permit terms.
P81001	2/26/2024	SCQAMD Rule 402; CA H&S Code 41700	For discharging such quantities of air contaminants to cause injury, nuisance, or annoyance to a considerable number of persons
P80010	2/27/2024	SCQAMD Rule 402; CA H&S Code 41700	For discharging such quantities of air contaminants to cause injury, nuisance, or annoyance to a considerable number of persons
P80865	2/28/2024	SCQAMD Rule 402; CA H&S Code 41700	For discharging such quantities of air contaminants to cause injury, nuisance, or annoyance to a considerable number of persons
P81002	3/4/2024	SCQAMD Rule 402; CA H&S Code 41700	For discharging such quantities of air contaminants to cause injury, nuisance, or annoyance to a considerable number of persons
P80866	3/5/2024	SCQAMD Rule 402; CA H&S Code 41700	For discharging such quantities of air contaminants to cause injury, nuisance, or annoyance to a considerable number of persons
P80867	3/7/2024	SCQAMD Rule 402; CA H&S Code 41700	For discharging such quantities of air contaminants to cause injury, nuisance, or annoyance to a considerable number of persons.
P80011	3/8/2024	SCQAMD Rule 402; CA H&S Code 41700	For discharging such quantities of air contaminants to cause injury, nuisance, or annoyance to a considerable number of persons.
P80012	3/13/2024	SCQAMD Rule 402; CA H&S Code 41700	For discharging such quantities of air contaminants to cause injury, nuisance, or annoyance to a considerable number of persons.
P80013	3/15/2024	SCQAMD Rule 402; CA H&S Code 41700	For discharging such quantities of air contaminants to cause injury, nuisance, or annoyance to a considerable number of persons.
P80014	3/18/2024	SCQAMD Rule 402; CA H&S Code 41700	For discharging such quantities of air contaminants to cause injury, nuisance, or annoyance to a considerable number of persons.
	3/21/2024	SCAQMD Rule 221(b); 1150.1(d)(1)(C)(i); 1150.1(d)(14); 1150.1(E)(7)(A)(ii); 3002(c)(1); 430(b)(1)	Failure to comply with the 1150.1 compliance plan; Failure to comply with all applicable provisions of Rule 1150; Failure to route all landfill gas to a gas control system that was operated continuously; Failure to operate gas collection and gas control systems at all times. Failure to close all valves when the system was shut down; Failure to record flow to the gas control device for Flare #1 at least every 15 minutes; Failure to vent gases collected by the landfill gas collection system to a combustion or processing facility which was in full use; Releasing raw landfill gas into the atmosphere; Failure to maintain minimum temperature of 1600 degree Fahrenheit while

			Flare #1 was in operation; Failure to maintain minimum temperature of 1600 degrees Fahrenheit averaged over a 15-minute period, while Flare #1 was in operation; Failure to operate the gas collection and control system at all times; Failure to operate the collection system such that all collected gases are vented to a control system; Operating equipment vented to air pollution control equipment which was not in full use; Failure to comply with all regulatory requirements and all permit conditions; Failure to comply with South Coast AQMD Rule 430 – Breakdown Provisions; Failure to report breakdowns within one hour.
P81004	3/27/2024	SCQAMD Rule 402; CA H&S Code 41700	For discharging such quantities of air contaminants to cause injury, nuisance, or annoyance to a considerable number of persons.
P75755	3/31/2024	SCQAMD Rule 402; CA H&S Code 41700	For discharging such quantities of air contaminants to cause injury, nuisance, or annoyance to a considerable number of persons.
P80869	4/2/2024	SCQAMD Rule 402; CA H&S Code 41700	For discharging such quantities of air contaminants to cause injury, nuisance, or annoyance to a considerable number of persons.
P80015	4/3/2024	SCQAMD Rule 402; CA H&S Code 41700	For discharging such quantities of air contaminants to cause injury, nuisance, or annoyance to a considerable number of persons.
P75757	4/9/2024	SCQAMD Rule 402; CA H&S Code 41700	For discharging such quantities of air contaminants to cause injury, nuisance, or annoyance to a considerable number of persons.
P80870	4/10/2024	SCQAMD Rule 402; CA H&S Code 41700	For discharging such quantities of air contaminants to cause injury, nuisance, or annoyance to a considerable number of persons.
P80016	4/16/2024	SCQAMD Rule 402; CA H&S Code 41700	For discharging such quantities of air contaminants to cause injury, nuisance, or annoyance to a considerable number of persons.
P80871	4/18/2024	SCQAMD Rule 402; CA H&S Code 41700	For discharging such quantities of air contaminants to cause injury, nuisance, or annoyance to a considerable number of persons.
P75766	5/6/2024	SCQAMD Rule 403(d)(1)(A) and 403(d)(4)	Allowing Track-out to extend 25 feet or more in cumulative length from the point of origin of an active operation. Allowing the emissions of fugitive dust from an active operation such the dust remains visible in the atmosphere beyond the property line of the emission source.

P80029	9/3/2024	SCQAMD Rule 402; CA H&S Code 41700	For discharging such quantities of air contaminants to cause injury, nuisance, or annoyance to a considerable number of persons.
P75792	9/4/2024	SCQAMD Rule 402; CA H&S Code 41700	For discharging such quantities of air contaminants to cause injury, nuisance, or annoyance to a considerable number of persons.
P80031	9/5/2024	SCQAMD Rule 402; CA H&S Code 41700	For discharging such quantities of air contaminants to cause injury, nuisance, or annoyance to a considerable number of persons.
P80457	9/6/2024	SCQAMD Rule 402; CA H&S Code 41700	For discharging such quantities of air contaminants to cause injury, nuisance, or annoyance to a considerable number of persons.
P75793	9/9/2024	SCQAMD Rule 402; CA H&S Code 41700	For discharging such quantities of air contaminants to cause injury, nuisance, or annoyance to a considerable number of persons.
P77631	10/1/2024	SCQAMD Rule 402; CA H&S Code 41700	For discharging such quantities of air contaminants to cause injury, nuisance, or annoyance to a considerable number of persons.
P81006	10/8/2024	SCQAMD Rule 402; CA H&S Code 41700	For discharging such quantities of air contaminants to cause injury, nuisance, or annoyance to a considerable number of persons.
P81006	10/11/2024	SCQAMD Rule 402; CA H&S Code 41700	For discharging such quantities of air contaminants to cause injury, nuisance, or annoyance to a considerable number of persons.
P80516	10/21/2024	SCQAMD Rule 402; CA H&S Code 41700	For discharging such quantities of air contaminants to cause injury, nuisance, or annoyance to a considerable number of persons.
P80463	10/22/2024	SCQAMD Rule 402; CA H&S Code 41700	For discharging such quantities of air contaminants to cause injury, nuisance, or annoyance to a considerable number of persons.
P80464	10/23/2024	SCQAMD Rule 402; CA H&S Code 41700	For discharging such quantities of air contaminants to cause injury, nuisance, or annoyance to a considerable number of persons.
P80465	10/24/2024	SCQAMD Rule 402; CA H&S Code 41700	For discharging such quantities of air contaminants to cause injury, nuisance, or annoyance to a considerable number of persons.

P80465	10/25/2024	SCQAMD Rule 402; CA H&S Code 41700	For discharging such quantities of air contaminants to cause injury, nuisance, or annoyance to a considerable number of persons.
P80468	10/26/2024	SCQAMD Rule 402; CA H&S Code 41700	For discharging such quantities of air contaminants to cause injury, nuisance, or annoyance to a considerable number of persons.
P80469	10/30/2024	SCQAMD Rule 402; CA H&S Code 41700	For discharging such quantities of air contaminants to cause injury, nuisance, or annoyance to a considerable number of persons.
P80470	10/31/2024	SCQAMD Rule 402; CA H&S Code 41700	For discharging such quantities of air contaminants to cause injury, nuisance, or annoyance to a considerable number of persons.
P80471	11/1/2024	SCQAMD Rule 402; CA H&S Code 41700	For discharging such quantities of air contaminants to cause injury, nuisance, or annoyance to a considerable number of persons.
P75800	11/8/2024	SCQAMD Rule 402; CA H&S Code 41700	For discharging such quantities of air contaminants to cause injury, nuisance, or annoyance to a considerable number of persons.
P80472	11/13/2024	SCQAMD Rule 402; CA H&S Code 41700	For discharging such quantities of air contaminants to cause injury, nuisance, or annoyance to a considerable number of persons.
P80473	11/14/2024	SCQAMD Rule 402; CA H&S Code 41700	For discharging such quantities of air contaminants to cause injury, nuisance, or annoyance to a considerable number of persons.
P80474	11/21/2024	SCQAMD Rule 402; CA H&S Code 41700	For discharging such quantities of air contaminants to cause injury, nuisance, or annoyance to a considerable number of persons.
P80475	11/22/2024	SCQAMD Rule 402; CA H&S Code 41700	For discharging such quantities of air contaminants to cause injury, nuisance, or annoyance to a considerable number of persons.
P80477	12/5/2024	SCQAMD Rule 402; CA H&S Code 41700	For discharging such quantities of air contaminants to cause injury, nuisance, or annoyance to a considerable number of persons.
P80478	12/20/2024	SCQAMD Rule 402; CA H&S Code 41700	For discharging such quantities of air contaminants to cause injury, nuisance, or annoyance to a considerable number of persons.

In addition, the following non-AQMD violations were issued in 2024:

Violation Date	Violation Type	Issuing Agency
2/29/24	27 CCR 20820, 20700, and 20690 (Drainage and Erosion Control; Intermediate Cover; Alternative Daily Cover. Alleged Areas of Concern: Gas Monitoring and Control; Litter Control; Grading of Fill Surfaces.)	Local Enforcement Agency
3/31/24	27 CCR 20820, 20700 (Drainage and Erosion Control; Intermediate Cover; Alternative Daily Cover.)	Local Enforcement Agency
4/30/24	27 CCR 20820 (Drainage and Erosion Control)	Local Enforcement Agency
5/16/24	LAMC Section 64.30	Los Angeles Bureau of Sanitation
6/5/24	Effluent Limit Violations	Los Angeles Regional Water Quality Control Board
8/28/24	27 CCR 20610 - Training	Local Enforcement Agency
9/24/24	California Code of Regulations, Title 17, Section 95460 et seq	California Air Resource Board
11/30/24	27 CCR 20830 (Litter Control)	Local Enforcement Agency
12/30/24	(Litter Control)	Local Enforcement Agency

4.0 TRANSPORTATION AND TRAFFIC

4.1 Transportation Improvements (IMP X.B.11, CUP 57, 67)

SCL was required to develop transportation improvements in the surrounding areas of the Facility upon commencement of the City/County project. There were no additional changes to transportation improvements in 2024.

Condition 67 of the CUP requires an annual fee payment of 50 cents per ton of refuse disposed to be used for an interest-bearing trust fund to provide funding for transportation improvements in the areas surrounding the Landfill. For 2024, SCL personnel paid $377,532.15 to the Department of Public Works to satisfy this requirement.

4.2 Truck Traffic Minimization (IMP X.B.12, CUP 26, 27, 57, 59, 60, 61, MRMP 25)

Under current permits, SCL has a daily capacity of 12,100 tons per day. It is anticipated that SCL will continue to have on-time cell construction and permitting approvals, which should eliminate any early landfill closures due to capacity issues. However, the landfill may, from time-to-time, experience closures due to extreme weather conditions, traffic events, or other unanticipated situations. These closures usually occur unexpectedly and close the landfill immediately. When this occurs SCL will implement the following plans to meet the plan objectives outlined in the permit.

The first plan objective entails that SCL will maintain a master list of regular landfill users, including key contact and dispatcher's telephone numbers, as well as personal cellular phones. This list is kept at the scale house and the Administration building. In the event of an unexpected closure, SCL will mobilize all available staff to contact all regular Landfill users, such as commercial and municipal users. SCL will inform them of the unexpected closure and have them immediately divert trucks to other disposal locations.

The second plan objective is to reserve 500 tons per day of capacity for small commercial and private users. This amount should easily accommodate the future volumes from these users. If the daily capacity needs of these users increase, SCL will increase the reserved volumes as appropriate.

Market factors are the main considerations in the way commercial customers schedule disposal of waste to the landfill. The need to keep labor and fuel costs down results in haulers planning collection routes and landfill deposits to maximize the volume of waste delivered by each vehicle and to avoid peak traffic hours. The peak traffic hours for truck traffic are from 9 AM – 10 AM and from approximately 12 noon – 1 PM. During these peak times, every effort is made to reduce queue times at the working face.

During any construction activity, traffic routes are planned to not disrupt traffic flow to and from the working face. There were no traffic disruptions to the working face in 2024 as a result of any construction activities.

Posted fee schedules for cash customers and negotiated contract rates with public and private haulers encourage full loads by incorporating minimum tonnage charges. In general, haulers will avoid partial loads to optimize time and fuel.

5.0 GROUNDWATER PROTECTION

5.1 Groundwater Testing (MRMP 53)

Groundwater monitoring results are submitted to the Los Angeles Regional Water Quality Control Board on a semi-annual basis. Appendix Q contains a summary of the monitoring results for 2024.

5.2 Leachate Sampling (MRMP 50)

Site waste liquids such as seep water, sub-drain water, leachate and condensate are collected and discharged to the sewer system.

The total amount of leachate collected each month is submitted to the LEA on a quarterly basis. Copies of these reports are included in Appendix R.

6.0 AIR QUALITY CONTROL

6.1 Wind Speed Monitoring ([Q] C.3.m)

As part of SCAQMD's Rule 1150.1 monitoring, wind monitoring is conducted when ambient air samples are collected on a quarterly basis.

A weather station was installed on the City South portion of the site in 2013 to measure wind speed and direction to monitor wind conditions at the City Landfill. Data from this weather station is transmitted to the Administration area where it is downloaded and saved. Copies of the weather monitoring data from this station are included in the hard copy of this report in Appendix S. Digital copies are available upon request.

A back-up weather station was installed at the administrative area of the site. It is used on an as need basis if the primary station is to be out of service. This weather station was installed at the beginning of 2024.

A third-party service provides daily wind and weather forecast data which is sent to the site on a daily basis. This information is reviewed and used to plan operations regarding wind or wet weather. A sample copy of this information is also provided in Appendix S.

6.2 Construction Emission Reduction Measures (MRMP 19 and 24)

All construction equipment used at SCL is kept in tune to manufacturer's specifications and is maintained in a manner that minimizes the emissions of each vehicle. Equipment that runs on diesel fuel uses reformulated low-emission diesel (Contractor owned equipment) or ultra-low sulfur diesel fuel (SCL owned equipment).

Advances in technology have resulted in non-mechanically controlled fuel systems, which discourage the manual retardation of engine timing. The Electronic Control Module (ECM), an engine mounted computer, regulates fuel injection and timing to Tier 2 and Tier 3 emissions standards as set by federal regulation. Keeping equipment in tune to manufacturer's specifications assure that vehicles operate at their peak capabilities. In 2009, six Tier 3 engines were fitted with additional Diesel Particulate Filters (DPFs) to help reduce emissions. In 2014, one (1) unit was retrofitted with an LPG engine to reduce emissions; one (1) unit was retrofitted with an LPG engine in 2015; one (1) unit currently uses ultra-low sulfur diesel fuel. All other DPFs have been eliminated due to fire hazards or problems associated with the ECM.

Construction contractors on site are bound by contract provisions to abide by the emission reduction standards set forth by the Conditions of Approval. Construction managers and site personnel monitor daily smog conditions and forecasts by either calling (800) 242-4666 or online at http://www.aqmd.gov/telemweb/Forecast.aspx and plan activities as appropriate.

SCL-owned heavy equipment is maintained in a manner recommended by the manufacturer. All vehicles are tuned to manufacturer's specifications. SCL's Computerized Fleet Analysis program (CFA) gives automated notification when equipment is due for maintenance.

Heavy equipment is serviced every 50 operating hours, with major service inspections occurring every 250 hours, 500 hours, 1,000 hours, 2,000 hours, 3,000 hours, 4,000 hours, and 5,000 hours. Inspection checklists are unique to equipment type and ensure that vehicles are maintained in proper tune per manufacturer's specification.

6.3 Operational Emission Reduction Measures (MRMP 25)

The traffic mitigation measures identified above help reduce emissions from idling vehicles. In addition, landfill personnel have been trained to identify vehicles emitting excessive smoke. Should they observe a vehicle they believe is emitting excessive smoke, the Operations Manager is contacted to observe the vehicle. If they concur that the vehicle is emitting excessive smoke, the driver is issued a warning, a copy of

which is kept on site and forwarded to the vehicle owner. In 2024, no warnings were issued.

7.0 LANDFILL GAS

7.1 Gas Generation Volume ([Q] A.6)

Landfill gas is directed to the Sunshine Gas Producers (SGP) gas-to-energy facility where it is converted to renewable energy. Any additional gas that is not used at the energy facility is diverted to Flares 1, 3, 9, 10 and 11 for destruction.

The total volume of gas flared in 2024 is as follows:

- Flare 1 – 1,242,471,985 standard cubic feet
- Flare 3 – 369,060,949 standard cubic feet
- Flare 9 – 1,170,748,645 standard cubic feet
- Flare 10 – 986,700,342 standard cubic feet
- Flare 11 – 1,301,649,587 standard cubic feet

The total volume of landfill gas directed to the SGP gas-to-energy plant in 2024 was:

- 3,711,298,806 standard cubic feet

The average inlet gas flow rates in scfm can be calculated from the information provided in Section 7.0, Gas Generation Volume, which provides the total volume of gas flared at each flare in 2024. To calculate the average inlet gas flow rates to each of the flares and the gas-to-energy plant, it has been assumed that each of these units operated 365 days/year, 24 hours/day:

- Flare 1 – 2,364 scfm
- Flare 3 – 702 scfm
- Flare 9 – 2,227 scfm
- Flare 10 – 1,877 scfm
- Flare 11 – 2,477 scfm
- Gas-to-Energy Plant – 7,072 scfm

Please note that each flare and the SGP gas-to-energy plant operates on an as-needed basis to ensure maximum collection efficiency.

The estimated site LFG generation rates were developed utilizing the attached United States Environmental Protection Agency (USEPA) Landfill Gas Emissions Model (LandGEM) Version 3.02 prepared by SCS Engineers. The most recent LandGEM update was performed in March 2024 (Appendix T). LFG generation rates were calculated based on available site-specific historic data including annual waste intake rates and input parameters based on the landfill location and historical operation.

7.2 Gas Monitoring Analysis, and Effectiveness ([Q] A.6)

Perimeter probes are monitored monthly by a third-party contractor (SCS Engineers) as required under Title 27. The LEA representative occasionally accompanies the SCS personnel during the perimeter probe monitoring events. Additional monitoring pursuant to SCAQMD Rule 1150.1 is conducted in accordance with permit requirements by RES Environmental. The text portion of the site's Rule 1150.1 reports for 2024 is provided in Appendix U.

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

Sunshine Gas Producers, L.L.C. (SGP) is a joint entity between DTE Biomass Energy and Landfill Energy Systems, under the management of DTE Biomass Energy, a large national landfill gas producer. SGP is the owner and operator of the turbine power plant at SCL. The project beneficially uses landfill gas to generate electricity as a commercially viable, environmentally friendly energy. The facility can generate approximately 20MW of renewable energy. The plant consists of 5 Solar Mercury turbines rated at approximately 4.6 MW each. Based on EPA guidelines, the beneficial use of the landfill gas will be equivalent to removing the emissions of 166,000 vehicles on an annual basis.

Construction of the project was completed in August 2014; testing was conducted throughout the month of August and the plant went on-line for commercial operation on September 1, 2014. The volumes of landfill gas used by the gas-to-energy plant by month are as follows:

Month – Year	Total Flow to SGP (scf)
January 2024	344,245,152
February 2024	294,778,106
March 2024	350,575,899
April 2024	332,324,917

May 2024	251,613,860
June 2024	291,304,179
July 2024	351,006,872
August 2024	330,112,427
September 2024	334,071,928
October 2024	150,423,321
November 2024	330,325,890
December 2024	351,081,585

8.0 OTHER ENVIRONMENTAL PROGRAMS

8.1 Stormwater Preventive Maintenance Program – MRMP 46

SCL's Stormwater Preventive Maintenance Program includes, but is not limited to, regular observation of facility equipment, systems, and stormwater management devices to detect and prevent breakdowns and failures. Documented Monthly Facility Inspections review temporary and permanent drainage systems, the effectiveness of dust control measures, diversion grading, paved surfaces, and potential discharge sources. Copies of the Monthly Facility Inspections are included in Appendix V.

Monthly Facility Inspections for January thru December 2024 are included in Appendix V. Daily staff observations also reveal areas that need to be addressed prior to the scheduled inspection, and such issues are repaired immediately. The site also maintains and adheres to a Stormwater Pollution Prevention Plan and submits annual Stormwater Reports to the Regional Water Quality Control Board.

8.2 Revegetation and Tree Planting (IMP X.B.8, [Q] A. 6)

Beginning in the second quarter of 2008, quarterly vegetation reports on all vegetation efforts at the landfill have been submitted. Updates on all revegetation and hydroseeding efforts are provided in these quarterly reports and include maps and descriptions of the type of work done each quarter. The quarterly vegetation reports for 2024 are included in Appendix W. A copy of the annual Oak Tree and Big Cone Douglas fir assessment report for 2024 is included in Appendix W.

At the end of 2023, the Big Cone Douglas Firs have reached their seven-year monitoring requirement.

As of 2024, two Coast Live Oak Trees were removed as part of if the 2024 Ultimate Entrance Improvement Project Phase 4. No Canyon Live Oaks or Big Cone Douglas Firs were removed in 2024.

At the present time, the only permanent slopes are within the City and County Sage mitigation areas. The sage mitigation areas continue to be monitored and maintained. In 2013, a sage mitigation pilot project was implemented on approximately five acres within the City Sage mitigation area.

A landscape architecture and planning contractor, Architerra Design Group, was contracted to design and develop a habitat restoration and landscape improvement plan for the City South C Trial Plot. This project is intended to be a pilot or demonstration project to determine the most effective course of action for re-vegetation of the closed deck and slopes area on the City South area of the site. Work on this project began in the first quarter of 2013 with construction/planting activities completed in May of 2013. Significant project components include the following:

- Soil testing for City South C trial plot including growth trials to determine optimal amendments;
- Importation of sediment from Terminal Basin cleanout to the project area to provide a more suitable base layer;
- Application of soil amendments;
- Grading of the pilot project area;
- Completion of a defined roadway around trial plot area and stabilization of the roadway for swale crossings;
- Installation of boulder and rip rap along swale lines to establish positive drainage pathways;
- Installation of boulders to control flow and establish micro-topography;
- Seeding and planting of area;
- Installation of on-grade irrigation system including the installation of a booster pump for City South C and future development phases;
- Installation of pathways to existing site gas wells in the City South trial plot area so planted areas will not be adversely impacted by foot traffic (e.g. during monitoring of gas wells)

Since late May 2013, activities for this project have continued with quarterly inspections and maintenance including weeding and maintenance to the irrigation system.

Maintenance activities of the City South decks A, B, and C continued throughout 2024 with quarterly assessments conducted by both Architerra & Rincon personnel and a third-party contractor Oakridge. The results of these assessments are included in the quarterly vegetation reports. Copies of the 2024 quarterly vegetation reports are included in Appendix W.

The implementation of a Venturan Coastal Sage Scrub (CSS) mitigation project on Deck B has been selected and was completed in December 2018. The Deck B CSS mitigation project has been incorporated into the quarterly monitoring program to determine if the same approach for the City South Deck C trail plot will be successful.

8.3 Archeological and Paleontological Reports (IMP X.B.9, IMP VII, [Q] A.6)

Reports verifying compliance with applicable archaeological and paleontological mitigation measures during 2024 are provided in Appendix X.

8.4 Noise Minimization ([Q] A.6)

To minimize noise impacts, all landfill heavy equipment operated at the facility are equipped with airflow silencers and low noise mufflers. No complaints associated with excessive noise from landfill activities were received during 2024.

8.5 Litter Control (CUP 48, [Q]A.6)

Measures to prevent and mitigate litter are incorporated into daily operations. These procedures are implemented more aggressively as needed based on wind conditions and the ability to control litter. Procedures include the following:

- Use of litter fences: primary (portable) litter fences surround the working face. The number and location of the primary litter fences are adjusted based on site conditions. Secondary litter fences are installed near the active working face. Tertiary litter fences are strategically installed throughout the landfill.

- Controlling placement of trash

- Size of the working face: the size of the working face is limited based on the ability to control litter, and is kept to the smallest footprint feasible

- Litter Control Crews: landfill personnel monitor the entrance road and the surrounding community for litter on a regular basis. Citizens can report litter via the site hotline. Daily logs from offsite litter monitoring are kept on file.

A written litter control program in conformance with CUP Condition 48 has been developed and submitted to County Public Works. An update to the plan was written in 2023 which was submitted and provided in the March 2023 TAC report. A copy of the of the updated plan is available in Appendix Y. Pursuant to the requirements of CUP Condition 48, a copy of the litter inspection logs for 2024 are provided in Appendix Y.

8.6 Alternative Fuel Vehicles (CUP 77, [Q] C.10.d.8)

8.6.1 Light Duty ([Q] C.10.d.1)

The filling station located at 12881 Encinitas Avenue, Sylmar, California, intermittently provides E-85 fuel. When available the light duty trucks used at Sunshine Canyon Landfill have been fueling with E-85. When the E-85 fuel is not an option, the light duty trucks use unleaded fuel.

According to research, there have been no advancements in technology for alternative fuel heavy machinery. No alternative fuel light-duty vehicles or heavy machinery have been purchased since the last update.

8.6.2 Heavy-Duty Alternative Fuel Pilot Program ([Q] C.10.d.6) k

A report prepared by Environ Corporation evaluating SCL's implementation of a heavy-duty alternative fuel pilot program was prepared 2012 and included in the 2012 Annual Report. Based on the results of the report, all compressed gas alternatives were not feasible at that time. There are no updates to this report.

8.7 Alternative Technologies (IMP X.B.10, CUP 69, 73)

In March 2016, the annual, and final installment of $200,000 to the alternative technology development fund as required by Condition 69 was made. Per this condition, "*…the Permittee shall contribute $200,000 annually, not to exceed $2,000,000 for the life of this grant, to an alternative technology development fund…"* The $2,000,000

amount was met in March 2016. Unless otherwise directed, no further payments will be made to the alternative technology development fund.