

May 30, 2025

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

Subject: 2024 Sunshine Canyon Landfill Joint Annual Report Response to Comments

Dear Mr. Nguyen,

Sunshine Canyon Landfill had prepared a draft Joint Annual Report dated April 1st, 2025, and disseminated the draft report to the following agencies: DPH-SWMP, Director of the Department, Director of Public Works, Los Angeles County Forester and Fire Warden, Regional Water Quality Control Board-Los Angeles Region, South Coast Air Quality Management District, County Museum of Natural History, and Community Advisory Committee.

Sunshine Canyon received comments from L.A County Department of Public Works and the L.A. County Department of Regional Planning regarding the 2024 Joint Annual Report. Per IMP Part XII Republic Services shall respond to each of the comments and shall include every comment and response with the 2024 Final Annual Report that will be submitted to the Regional Planning Commission and the Sunshine Canyon Landfill – Technical Advisory Committee. Please find the comments and responses below.

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

Sincerely,



Kate Downey
Environmental Manager
Sunshine Canyon Landfill

GENERAL COMMENTS from DPW

Comment 1: Republic Services shall respond to each of the comments below and shall include comments and responses with the 2024 Final Annual Report to be submitted to the Regional Planning Commission and the Sunshine Canyon Landfill – Technical Advisory Committee, as required by IMP Part XII.

Response 1: All comments made by the Department of Public Works have been responded to and will be included with the 2024 Final Annual Report.

Comment 2: All Pertinent plans or maps need to be stamped and signed by a licensed surveyor or registered civil engineer. Stamped plans or maps shall be included in the 2024 Final Annual Report.

Response 2: All pertinent plans or maps have been stamped and signed by a licensed surveyor or registered civil engineer.

Comment 3: Please refer Appendix section to appropriate document, see Appendix B & D “Landfill Survey” and “Five-Year Plan”

Response 3: Appendix B & D are referenced in the appropriate sections of the report.

SPECIFIC COMMENTS

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

Comment 4: The total Waste Disposal 2,516,889.94 (tons) does not match sum of monthly tonnage reports in Appendix A (minor discrepancy). Please confirm or correct the table for total waste disposal (tons) based on Appendix A. If necessary, update the Waste Disposal in CY based on recalculation.

Response 4: The table has been corrected to reflect the total waste disposal tons in 2024. The corrected total is 2,516,880.45 (tons) which is reflected in Appendix A.

Comment 5: The amount of Beneficial Reuse in the Report is inconsistent with the monthly tonnage reports and Appendix A, specifically month of February. Please confirm the total amount of Beneficial Reuse or recalculate if necessary.



Response 5: The February 2024 Tonnage Report has been updated to reflect the correct amount Beneficial Reuse accepted during this time. The amount was updated from 2,143.42 tons to 2,447.63 tons.

Comment 6: Please confirm the monthly tonnage of Clean Soil accepted at SCL based on monthly tonnage report in Appendix A. Tonnage reported for some months are inconsistent with Appendix A.

Response 6: The Monthly Summary of Clean Soil Table has been updated to be consistent with Appendix A.

2.2.2 Capacity (IMP X.B.1)

Comment 7: Per the 2024 Report, 59,231,713 CY was reported as remaining capacity. Compared to the previous 2023 Report, 60,622,363 CY was reported as the remaining capacity. The difference between this year-to-year in remain capacity is approximately 1,390,650 CY, as volume of airspace consumed. Per the aerial flyover calculation in Appendix D, the amount of airspace consumed in 2024 was 2,628,140 CY. Please explain the difference between the remaining capacity as calculated in Appendix D vs the airspace capacity reported from year to year.

Response 7: Based on the current approved JTD (updated October 2024) master final grading plan, the remaining available airspace was recalculated. The updated master final grading plan will better establish positive drainage throughout the site at final elevations to reduce potential for erosion, and maximizes the existing permitted volume

2.2.3 Fill Sequencing

Comment 8: Please confirm the maximum elevation on the County side of the Landfill. The November 20, 2024, aerial survey shows elevations above 1,888 ft indicated in the Report.

Comment 8: The maximum elevation on the County has based off the November 20, 2024, aerial survey has been determined to be 1,895.3 ft. This new figure will be represented in this section of the report.

2.3 Landfill Survey

Comment 9: Update Appendix reference containing the aerial survey and topographic map.

Comment 9: The Appendix reference has been updated to reflect the correct Appendix.

2.5 Landfill Survey

Comment 10: Update reference to County of Los Angeles Disposal Facility Annual Activity Report (2023).

Comment 10: The reference to County of Los Angeles Disposal Facility Annual Activity Report has been updated from 2023 to 2024.

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

Comment 11: The verbiage in section 3.1 substantially similar from the previous 2023 report. Please identify in this section the mitigation measures that have been undertaken during this reporting period.

Response 11: Additional language regarding newly implemented odor mitigation strategies has been added to this section of the report. Beginning in 2025, Sunshine Canyon Landfill has been subject to Stipulated Abatement Order which has mandated additional actions be taken to mitigate odors. These actions will be discussed in the 2025 Joint Annual Report.

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

Comment 12: Please confirm the total number of NOVs issued by AQMD for 2024 and include any missing NOVs including NOV dated 2/24/24.

Response 12: The total number of NOVs issued by the SCAQMD for 2024 was 67. There was no NOV issued on 2/24/24.

Comment 13: Report indicates (5) NOVs issued by the LEA. Violation table indicates (6) NOVs issued by LEA. Please confirm the total number of NOVs issued from all sources.

Response 13: This section of the report has been updated to reflect that the LEA issued six NOVs for 2024. There was a total of 76 NOVs issued in the year 2024.

Comment 14: Verify that each of the AQMD violations have the appropriate AQMD rule and description, including but not limited to the following dates 2/15/24, 5/6/24, 9/3/24, 9/5/24, 9/6/24, 10/26/24

Response 14: All NOV's listed in the Summary of NOV's Issued from SCAQMD - 2024 Table have been updated to include the appropriate rule and description.

Comment 15: Verify that all non-AQMD violations issued in 2024 are being recorded. CARB issued an NOV on 9/24/24 that was not included in the table for non-AQMD violations.

Response 15: The NOV issued on 9/24/24 from the California Air Resource Board (CARB) has been included in the table for non-AQMD violations.

Comment 16: Update Appendix P to reflect any NOV's not included in draft Report.

Response 16: Appendix P has been updated to reflect any NOV's not included in the draft report.

7.3 Gas Generation

Comment 17: Confirm the calculation for average inlet gas flows (in scfm) from the total volume of gas flared for 2024.

Response 17: Gas calculations have been updated to reflect the total volume of gas flared and the average inlet gas flow rates.

Comment 18: Confirm the latest LandGEM model run date.

Response 18: This section of the report has been updated to reflect the most recent LandGEM model run date which occurred in March of 2024.

8.2 Revegetation and Tree Planting

Comment 19: Update 2024 Vegetation Report reference date. Per the Report, the Annual Oak Tree & Big Cone Douglass Fir Assessment Report shall be included in the Final Report.

Response 19: The Annual Oak Tree & Big Cone Douglass Fir Assessment Report has been included in Appendix W.

Appendix B

Comment 20: Please review plans and include or define applicable layers in the key legend, ie fence layer, water surface layer, etc.

Response 20: All applicable layers have been defined and included in Appendix B.

Appendix D

Comment 21: Please include a title page with site aerial and table of contents.

Response 21: A table of contents and title pages have been included in Appendix D.

Appendix S

Comment 22: Please include all weather data from 2024, December 2024 data is incomplete.

Response 22: All weather data from 2024 is included in Appendix S.

General Comments from L.A. County Department of Regional Planning

Comment 23: Please provide a list of all agencies that were provided a copy of the Report (IMP X.A.).

Response 23: Please find below a list of the recipients of the 2024 Joint Annual Draft Report:

Community Advisory Committee

- Wayde Hunter <whunter01@aol.com>;

County Museum of Natural History

- Carlos Casillas <ccasilla@nhm.org>;

Los Angeles City Planning

- Claudia Rodriguez <claudia.rodriguez@lacity.org>;
- Lisa Webber <lisa.webber@lacity.org>;
- Tim Fargo <TIM.FARGO@lacity.org>;

Los Angeles County, Department of Public Works

- Dave Nguyen <dnguyen@dpw.lacounty.gov>;
- Michael Harmon <mharmon@dpw.lacounty.gov>;
- Emiko Thompson <ethomp@dpw.lacounty.gov>;
- EDL-DPW Landfills <Landfills@dpw.lacounty.gov>;
- Christopher Sheppard <CSHEPPARD@dpw.lacounty.gov>;

Los Angeles County, Department of Regional Planning

- Alex Garcia <agarcia@planning.lacounty.gov>;
- Phillip Chen <PChen@planning.lacounty.gov>;
- Christina Nguyen <cnguyen@planning.lacounty.gov>;
- Steven Jareb <sjareb@planning.lacounty.gov>;

Los Angeles County, Forester and Fire Warden

- Kien Tan <Kien.Tan@fire.lacounty.gov>;
- Anthony Marrone <Anthony.Marrone@fire.lacounty.gov>.
- Albert Yanagisawa <Albert.Yanagisawa@fire.lacounty.gov>;

Los Angeles Regional Water Quality Board

- Enrique Casas <Enrique.Casas@waterboards.ca.gov>;

South Coast Air Quality Management District

- Larry Israel <lisrael@aqmd.gov>;

Sunshine Canyon Landfill, Local Enforcement Agency

- Dorcas Hanson-Lugo <dlugo@ph.lacounty.gov>;
- David Thompson <david.thompson@lacity.org>;

