SUNSHINE CANYON LANDFILL

A REPUBLIC SERVICES COMPANY

June 15, 2012

Mr. Ed Pupka
Senior Enforcement Manager, Engineering and Compliance
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, California 91765

Subject: Final Odor Plan of Action, Third Stipulated Amended Order for Abatement,
Case No. 3448-13, Condition 1.h
Sunshine Canyon Landfill, Facility ID 49111

Dear Mr. Pupka,

In accordance with Condition 1.h of the Third Stipulated Amended Order for Abatement
(S/O), Case No. 3448-13, enclosed please find the Final Odor Plan of Action (OPA).
This plan incorporates responses to comments received via email on April 24, 2012 from the
County of Los Angeles Department of Public Works, Environmental Programs
Division (DPW) and the Sunshine Canyon Landfill Local Enforcement Agency (SCL
LEA). These comments were discussed at a meeting held on May 9, 2012. Responses to
those comments are included as Attachment 13 to the Odor Plan.

As discussed at the May 9th meeting, this submittal only includes the text portion of the
Final OPA. In addition, the following attachments to the OPA are included as they are
new and have not been submitted previously:

- Attachment 13  - Response to Comments, May 4, 2012
- Attachment 14  - Odorous Load Screening, Transfer Station Training,
April 2012
- Attachment 15  - Odorous Load Tracking Sheet

In addition, Attachment 5, Response to Comments, March 27, 2012 is included. A
typographical error in the response to Comment 8 has been corrected.

We appreciate the opportunity to work with you and representatives from the other
agencies in finalizing the Odor Plan of Action for Sunshine Canyon Landfill. As always,
if you have any questions, please do not hesitate to contact me at
PCosta@republicservices.com or (818) 362-2075.

Sincerely,

[Signature]

Patti K. Costa
Environmental Manager
Sunshine Canyon Landfill

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Attachments: Final Odor Plan of Action, June 5, 2012, including Attachments 13, Attachment 14, and Attachment 15
Attachment 5, Response to Comments (Revised), March 27, 2012

Cc: Mr. David Cieply, Republic Services
Mr. Anthony Bertrand, Republic Services
Mr. Tony Pelletier, Republic Services
Ms. Cindy Chen, SCL LEA Program Manager
Mr. Wayne Tsuda, SCL LEA
Mr. David Thompson, SCL LEA
Mr. Gerry Villalobos, SCL LEA
Mr. Eugene Tseng, SCL LEA
Ms. Emiko Thompson, Los Angeles County Department of Public Works
Ms. Linda Lee, Los Angeles County Department of Public Works
Ms. Ly Lam, City of Los Angeles, Department of Planning
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RESPONSES TO COMMENTS, LETTER DATED MARCH 7, 2012  
(REVISED)

Comment 1: Section 1.2.1, Corrective Action Manager (CAM)

On page 3, there is a statement that a schedule of personnel assigned to the CAM position will be maintained on a weekly basis to ensure all shifts are covered. The District would like language added on CAMs recording a checklist to leave between shifts to coordinate completion of outstanding corrective actions. The District would like the Facility to provide a description of what is referred to as catastrophic investigations and repairs.

Response to Comment 1

A CAM shift report is completed at the end of each shift. A copy of this form is included in Attachment X. In addition, a checklist has been developed which will be used to document outstanding corrective actions on-going during a shift so the CAM on the following shift is aware of these actions. A copy of this checklist is included in Attachment X.

Section 1.2.1 states "...all but catastrophic investigations and repairs will take place only during normal operating hours when appropriate personnel and equipment can safely and effectively perform necessary repairs." For purposes of the OPA, "catastrophic" means widespread damage that would require sufficient time for site personnel to assess damage, coordinate appropriate contractors, and have those contractors perform the necessary repairs. This type of event would likely be caused by a significant earthquake or fire. Wording in Section 1.2.1 has been modified to provide a clearer understanding of what type of event would be considered catastrophic.

It should also be noted Condition 17.3.b of SCL’s Solid Waste Facility Permit (SWFP) allows for “emergency operations, equipment repairs, and mitigation measures necessary to avoid environmental impacts, which cannot be accomplished (during normal working hours), may be performed at any time with prior written approval of the EA (e.g. LEA).” If such a situation arises where emergency repairs need to be made outside of regular facility hours, SCL is committed to working with the LEA and other regulatory agencies to obtain the necessary approvals to perform necessary repairs.

Comment 2: Section 2.1.1, Daily Cover

On page 3, the facility refers to a proposal to study non-soil cover alternatives as a supplement to the Working Face Study required by the Order. The District is seeking additional information on the details of the proposed study, including a description of the various factors (e.g. waste density in place, waste/cover ratio, etc.) that are being evaluated for each type of proposed alternative cover, and specifically describe in detail
how these cover alternatives can effectively control working face odors once employed, and how these covers will prevent and/or minimize leachate seeps and will enhance the collection efficiency of landfill gases. Evaluation factors will also be needed for the benchmark reference oil cover for comparative purposes. Reevaluation of the soil cover may occur once the upgrades to the landfill gas collection system have been completed. The primary factor for re-evaluation is how the proposed cover materials compare with the reference standard in terms of controlling the odor problem.

Response to Comment 2

SCL received comments from DPW on February 27, 2012 on the proposal to conduct a focused study on alternative daily cover (ADC). As of the date of this response, SCL personnel are discussing the comments received from DPW internally and have not formalized a response to DPW’s comments. SCAQMD, DPW, LEA and City Planning will be informed when a decision is made with respect to what actions will be proposed regarding any evaluation of ADC.

Section 2.1.1 of the OPA has been modified to delete the reference to the study of ADC.

Comment 3: Section 2.1.3, Misting Systems

On page 7, the Facility refers to various methods of applying odor neutralizing chemicals when adverse odors are present and under certain mandated conditions. The District is seeking additional information on the details of the Facility’s discussion with Global Misting Systems regarding the inability of the existing system to capture odor molecules leaving the working face area; details on any discussions the Facility has engaged in regarding the system modifications to reduce the size of the mist droplets to better capture odor molecules; details on the reasons the Facility limits the application of the haul road misters only between the 6 am and 10 am and 6 pm to 10 pm, and why is only potable water applied during the remaining operating hours; and details on the criteria the Facility uses to determine the “as-needed” basis application of the perimeter misters to supplement other odor control measures.

Response to Comment 3. Additional Details on System Modifications

In Section 2.1.3.1, Misting Systems, Additional Actions, we state that we are continuing to evaluate the site’s portable misting systems to determine if there are additional actions that can be taken with these systems to reduce odors specifically from the working face. We have been working with both the manufacturer of the Dust Boss, Dust Control Technologies, and also Mr. David Hill from Global Odor Control (GOC) on this issue.

Our contact at Dust Control Technologies was asked to provide a response to the comment regarding the DustBoss system modifications. Her response is as follows:

*As originally designed, the DB60 uses nozzles that produce water droplets in the 50-200 micron range and the machine will flow an average of 22 gallons of water per minute. The unit was designed for dust control and functions well for that purpose. As designed, the DB60 produces too

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much water and too large of a water particle size to be ideal for controlling odor. The water particle size needs to be similar in size to the particle that you are trying to capture. The ultimate goal is to create water particles in the 5-7 micron range. Since we have not yet determined how to reach this size, we have decided to do a trial with what we expect to be an intermediary step, but also a large improvement over the current configuration of the DB60. The DB60 has been modified to have a single air atomizing nozzle that will create water particles in the 27-38 micron range. The water flow will be about 0.37 gpm. We believe that this configuration will be an improvement over the current configuration."

Mr. David Hill (GOC) was also asked to provide a response:

“When we perceive odor, it is because compounds in a solid or liquid mass have become volatile - in other words gaseous. In this gas state, they are lighter than liquid particles, and thus capable of moving through and with air currents at a faster rate than liquid or solid particles.

Deodorization normally works by having a liquid particle contact the odorous gas. If the odor molecule binds with or enters the liquid particle, it leaves the gaseous state and becomes a liquid again.

Deodorizers are thus formulated to bind with the gaseous compound on contact, resulting in a reaction that makes a new compound which is less volatile or not volatile at all, or a new compound that is not odorous or is less odorous than its predecessor.

The key point here is "contact". The goal of any liquid particle deodorization system must be to contact as many of the odor molecules as possible. When the liquid particle comes out of the nozzle, it will begin to evaporate and become smaller in size and closer to the weight of the gas. But starting the particles as small as possible increases the percentage of contact and increases the potential coverage area by allowing the deodorizer to move more swiftly and to be impacted by wind and air currents in much the same way as a gas.

Therefore we have 2 potential goals:

1) The smallest possible particle size exiting the nozzle
2) The lightest possible liquid with the fastest evaporation rate

The reasoning is direct. Some odors are escaping the site and escaping contact with the deodorizer. These are most probably being lifted up and over the system and then being pushed down by the wind into the surrounding neighborhood. Our goal is to decrease the extent of this escape by increasing the speed with which the deodorizer moves through the air and the rate at which it evaporates and becomes gaseous. The modifications to the Dust Boss are intended to produce a smaller, lighter, and thus "faster" deodorizer particle.
As of the date of this response, the modified DustBoss has been delivered to the site. A new pump was required which was delayed by the manufacturer. The pump was received and the system required electrical modifications. These were complete and the new DustBoss was tested in the maintenance area on March 22, 2012 following guidelines provided by Dust Control Technology. It has been determined that further modifications need to be made prior to placing this system at the working face. These are currently being addressed. Updates on this item are provided in the monthly reports submitted to SCAQMD.

Response to Comment 3, Misting System along Haul Road

The hours the misting systems along the haul road have changed; they are now operated only from 6:00 AM to 10:00 AM and from 6:00 PM to 10:00 PM and not between these hours. Neutralizer is added to these misting systems during these hours.

Response to Comment 3, Perimeter Misting System

The OPA states the perimeter misters are operated on an as-needed basis if operations personnel feel it is necessary to supplement other odor control measures. The perimeter misters are now operated on a system that turns the misters on when adverse wind conditions are detected. Section 2.1.2 has been modified to reflect this change.

Comment 4: Section 2.2.3, Working Face Size Restrictions

The Sunshine Canyon Landfill LEA was just recently provided the Working Face Study and is in the process of reviewing the study. They would like to reserve the ability to request additional information regarding the conclusion that the size of the working face is not related to the odor source strength following review of the study.

Response to Comment 4

Comment noted. SCL personnel will address comments on the Working Face Study from the LEA once they are received.

Comment 5: Section 2.2.3.1, Working Face Size Restrictions – Additional Actions

The County Department of Public Works would like the current daily cover requirements kept in place until odor complaints drop to the pre-2009 levels. The Sunshine Canyon Landfill LEA will consider supporting a return to past working face operational practices once the infrastructure (specially designated disposal areas and odorous load operational practices, etc.) have been established for the management of odorous loads.

Response to Comment 5

Comment noted
Comment 6: Section 2.3.1, Special Waste Screening Process

On page 10, the Facility refers to Republic Service’s Special Waste Screening Process. The Los Angeles County Department of Public Works would like for that process to be permanently incorporated in the Facility’s operational practices. The District would like the Facility to provide its reference for what it describes as the regulatory definition of special waste.

Response to Comment 6, Special Waste Screening Process

SCL is required to follow Republic Service’s Special Waste Screening Process as it is a Corporate Policy, therefore it does not need to be incorporated into the Facility’s operational practices.

Response to Comment 6, Regulatory Definition of Special Waste

The following definition of Special Waste was obtained from http://www.epa.gov/osw/nonhaz/industrial/special/:

“Congress enacted the Resource Conservation and Recovery Act (RCRA) (Public Law 94-580) on October 21, 1976. RCRA required EPA to “promulgate regulations identifying characteristics of hazardous waste and listing particular hazardous waste” that would be subject to hazardous waste management standards. EPA also was required to develop standards for the owners and operators of hazardous waste treatment, storage and disposal facilities.

In response to this mandate, EPA proposed regulations for managing hazardous waste under Subtitle C of RCRA on December 18, 1978 (43 FR 58946). Included in these proposed regulations was a deferral of hazardous waste requirements for six categories of waste—which EPA termed “special wastes”—until further study and assessment could be completed to determine their risk to human health and the environment. The six categories of special wastes included:

- Cement kiln dust
- Mining waste
- Oil and gas drilling fluids and oil production byproducts
- Phosphate rock mining, beneficiation, and processing wastes
- Uranium waste
- Utility waste (i.e., fossil fuel combustion waste)
These wastes typically are generated in large volumes and, at the time, were believed to possess less risk to human health and the environment than the wastes being identified for regulation as hazardous waste.

On October 12, 1980, Congress enacted the Solid Waste Disposal Act Amendments of 1980 (Public Law 96-482) which amended RCRA in several ways. Pertinent to special wastes was the addition of sections 3001(b)(2)(A) and 3001(b)(3)(A). These new sections—frequently referred to as the Bentsen and Bevill Amendments—exempted "special wastes" from regulation under Subtitle C of RCRA until further study and assessment of risk could be performed. Specifically, the Bentsen Amendment (§3001(b)(2)(A)) exempted drilling fluids, produced waters, and other wastes associated with the exploration, development, and production of crude oil or natural gas or geothermal energy. The Bevill Amendment (§3001(b)(3)(A)(i-iii)) exempted fossil fuel combustion waste; waste from the extraction, beneficiation, and processing of ores and minerals (including phosphate rock and overburden from uranium ore mining); and cement kiln dust.

The Bentsen and Bevill Amendments also required EPA to complete full assessments of each exempted waste and submit a formal report to Congress on its findings. Section 8002 explicitly identified the requirements for each special waste study and established deadlines for submission of the final reports. After completion of each respective "Report to Congress", EPA was then required to make a final regulatory determination within six months as to whether the special waste in question warranted regulation as a hazardous waste under Subtitle C of RCRA. At this time, all Reports to Congress are complete and most final regulatory determinations, except Cement Kiln Dust, have been made."

**Comment 7: Section 2.3.2, Rejection of Odoriferous Loads**

The District would like the Facility to provide copies of incidents and/or reports on the frequency and nature of any odoriferous load rejections over the last two years. The District would like information that clarifies the area/site where construction and demolition (C&D) debris is prohibited at the landfill, where odor problems occurred as identified in September 2011; where C&D debris is allowed at the landfill; how it is assessed and handled; the percentage of calcium sulphate/gypsum in the C&D debris; and how odors are minimized from C&D debris. The District would like a condition added to address focusing particularly on loads with drywall, especially loads with lots of broken up and/or powdered drywall, which is much faster reacting.

**Response to Comment 7 – Odoriferous Load Rejections**

SCL does not have records on the frequency and nature of any odoriferous load rejections over the last two years. This practice will be incorporated into the Odorous Load Management program and is part of the training for this program.
Response to Comment 7 – C&D Material

SCL does not take loads of C&D material. These loads are taken directly from Republic Services’ Sun Valley Hauling location to Crown Disposal located in Sun Valley for recycling. The only C&D material that comes to SCL is incidental that is co-mingled with municipal solid waste material.

The material that was identified in September 2011 as odorous was identified as grindings from Community Recycling’s dirty municipal recycling facility (MRF). This material was used for liner cover material and a small quantity was left at the end of the project. All the material was properly disposed in the working face and is prohibited from the site since that time.

SCL personnel do not believe that a condition specifically addressing loads of drywall is applicable.

Comment 8: Section 2.3.3.2, Privately Operated Hauling Companies

The District would like the Facility to provide copies of reports, actions developed and taken and results addressing mitigation of odors from loads from third party/independent haulers. The District would like information on development updates, including the final copy of the protocols for odoriferous load checking developed with CalRecycle or the Sunshine Canyon Landfill LEA.

Response to Comment 8 – Mitigation of Odors from Third Party/Independent Haulers

Actions taken by SCL to work with third party customers are reported in the monthly odor reports submitted to SCAQMD. The following information was provided in the February 2012 Odor Report:

- SCL has worked with one major customer whose wastestream has been identified as odorous to delay the receipt of their containers until after 9 AM. This practice went into effect on February 1, 2012;

- In January 2012, a misting system that sprays neutralizer on waste was installed at a major customers’ facility as a joint effort between Republic Services, the customer and an odor control company. Work to automate the system was completed in February and an evaluation of the effectiveness of this process was performed. Based on the evaluation, the odor neutralizer system will continue to be used at the customer’s facility. Additional testing is being conducted to determine if further actions can be taken to ensure potential odors from this wastestream are mitigated as effectively as possible;

- Procedures for the handling and management of odoriferous loads at Republic-operated transfer stations have been developed. SCL personnel are working with transfer station personnel to conduct training on the procedures to be followed;

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SCL personnel will meet with the SCL LEA to discuss the protocols for odoriferous load checking.

**Comment 9: Section 2.3.5, Additional Actions for Controlling Odors at Working Face**

On page 15, the Facility's list of additional actions for controlling odors at the working face includes placing a soil layer over an odoriferous load as soon as it is processed. The Los Angeles County Department of Public Works would like for that process to be permanently incorporated in the Facility's operational practices. The District would like the Facility to confirm whether a special area on the working face is designated for odoriferous loads and how are the odoriferous loads identified and/or segregated.

**Response to Comment 9**

We disagree with the County Department of Public Works that the requirement of placing 9 inches of daily cover soil on the working face should be incorporated into the Facility's operational practices. For the reasons we have previously explained to the DPW, we believe this practice does not serve to control odors and will ultimately lead to increased odor issues due to the creation of leachate seeps and interference with the gas collection system. We do not think this should be made a requirement of the Facility's OPA. We have deleted any reference to the use of 9 inches of daily cover soil at the working face from the OPA.

A portion of the working face is designated for odoriferous loads so they can be processed as soon as possible after they are deposited. Section 2.3.5 of the Odor Plan of Action contains the process by which odoriferous loads are identified and the subsequent actions that are taken by site operations personnel.

**Comment 10: Section 2.4.1.5, Off-Site Odor Patrol Logging System**

The District would like the Facility to develop a procedure for providing access to the Off-Site Odor Patrol Logging System to the District and the other regulatory agencies.

**Response to Comment 10**

The secure website to view the odor observations logged by SCL Odor Monitors during their odor patrols can be accessed as follows:

b). Email: odorpatrol@gmail.com (note: this will only need to be done first time)
c). Password: odorpatrol#1 (note: this will only need to be done first time)
d). Select View Observation Raw Data
Comment 11: Section 3.2.5 Surface Emission Monitoring

In the past, shredded green waste was utilized for erosion control on the side slopes. Decomposing greenwaste is a potential source of odor and covered seepages and intermediate cover sideslope fissures. The Sunshine Canyon Landfill LEA would like the Facility to use fully matured (cured) stabilized compost for the sideslopes to help temporary vegetation get established and to help with erosion control.

Response to Comment 11

SCL will consider using more organic material for enhancing vegetative growth, however serious consideration must be taken for the odorous content of the material so it does not exacerbate the off-site odor issue. SCL personnel will evaluate the use of the cured, stabilized compost for future use.

Comment 12: Section 3.2.5.1 Procedures for Surface Emission Monitoring

Monitoring should be done more frequently after major rainstorms and on areas designated for “odorous load disposal” to ensure cover is adequate.

Response to Comment 12

Surface emission monitoring is conducted on portions of the landfill where filling operations have ceased, therefore it is not appropriate to conduct surface emission monitoring on areas designated for “odorous load disposal”.

The SEM monitoring plan stipulates that we perform our regularly scheduled surface monitoring at least 72 hours after a rain event in order to get a true representation of surface emissions. We currently perform surface emissions monitoring on a monthly basis and we perform re-monitoring within 3 days of the initial monitoring event in accordance with the S/O. We believe the current schedule adequately measures surface emissions from the landfill surface.

RESPONSES TO COMMENTS, LETTER DATED JANUARY 20, 2012 FROM SCAQMD

Comment 1: The Revised Odor Plan is to include the duties and responsibilities of the Environmental Monitor.

Response to Comment 1

The Odor Plan of Action has been revised to include the duties and responsibilities of the Environmental Monitor as defined by the S/O. However, it should be noted that the Odor Plan of Action is intended to provide the best management practices that facility personnel will use to prevent, monitor, and address odor issues at SCL. As defined in

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the S/O, the Independent Environmental Monitor (IEM) is a third party independent contractor whose function it is to coordinate with the Corrective Action Managers to “address, respond to, investigate, and take corrective action(s) to remediate the source of the odors and document odor issues reported by the community.” The third party contractor hired by SCL to perform the function of the Environmental Monitor is currently developing the procedures their employees will follow to meet the requirements of the S/O. Therefore, we believe it is not appropriate for SCL to dictate to the IEM in the OPA what procedures the IEM should follow in performing their functions.

Comment 2: In the section regarding queuing of trucks, the District would like language added on how the Facility will identify odiferous loads in queue to create a process where trucks are taken out of queue and the odoriferous load is buried immediately.

Response to Comment 2

The process for identifying odiferous loads is described in Section 2.3.4 of the OPA. As required by the S/O, the misting system along the main haul road was extended to the scalehouse in December 2011. This misting system was installed to mitigate potential odors from trucks queuing in this area. It should be noted that although the S/O allows for trucks to queue on-site at 5:00 AM on weekdays, and 6:00 AM on Saturday, no trucks are coming on-site at these hours.

Comment 3: The District is seeking additional information on whether odiferous loads are neutralized during tipping and buried immediately at the working face, or if the Facility has a designated area for depositing, neutralizing and burying them immediately, if not, the District would like the Facility to consider this alternative.

Response to Comment 3

Please refer to the response to Comment 9 (March 7 letter). There is no direct application of neutralizer on any loads while a load is being deposited on the working face. Neutralizer is added to the DustBoss systems which are intended to spray a fine mist of water/neutralizer solution over the working face. Please refer to the response to Comment 3 (March 7 letter).

Comment 4: In Section 3.2.5.1 regarding Procedures for Surface Emission Monitoring needs to be edited. The third sentence in the first paragraph on page 28 should be modified to, “The end of the wand will be held within 3 inches of the landfill surface while monitoring.” The second sentence at the top of page 29 should be modified to “Any location where an emission level is greater than 200 ppm above background is detected shall be reported as an exceedance.”

Response to Comment 4
Section 3.2.5.1 of the OPA has been revised to include the changes noted in the comment.
Sunshine Canyon Landfill

Final Odor Plan of Action

June 15, 2012
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Attachment 4  January 20, 2012 and March 7, 2012 Comment Letters
Attachment 5  Response to Comments, March 27, 2012 – Amended
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Attachment 9  Sunshine Canyon Landfill Odor Patrol Recordkeeping Form
Attachment 10 SCQMD Landfill Odor Wheel
Attachment 11 Odor Complaint Tracking Form
Attachment 12 Sunshine Canyon Landfill Newsletter
Attachment 13 Response to Comments, May 4, 2012
Attachment 14 Odorous Load Screening, Transfer Station Training, April 2012
Attachment 15 Odorous Load Tracking Sheet
1.0 Introduction

The purpose of this Odor Plan of Action (OPA) is to outline the best management procedures that facility personnel will use to prevent, monitor, and address odor issues at Sunshine Canyon Landfill. It is the goal of the Sunshine Canyon Landfill to continue to implement processes that are currently in place and to identify additional odor control measures to eliminate odor-related and off-site odor complaints.

1.1 Background

Sunshine Canyon Landfill (SCL) is a municipal solid waste landfill with 363 acres of permitted fill and a maximum permitted daily tonnage intake rate of 12,100 tons per day. The facility is owned and operated by Browning Ferris Industries of California, Inc., a wholly owned subsidiary of Republic Services Inc.

In response to a request from the Los Angeles County Department of Public Works (DPW)(November 27, 2010), an Odor Mitigation Plan was submitted on December 30, 2010. SCAQMD subsequently requested an odor management plan for the site. The preliminary OPA was submitted to SCAQMD on March 31, 2011. A revision was submitted on May 3, 2011, which incorporated changes addressing SCAQMD comments dated April 15, 2011. Additional SCAQMD comments were received during a conference call on June 7, 2011; these comments were incorporated into the final OPA dated June 24, 2011.

On December 3, 2011, the Third Stipulated Amended Order for Abatement (S/O) was signed (Attachment 1). Condition 1.h provides SCL shall amend and expand the final OPA to include specific odor mitigation measures. This revised OPA addresses the requirements of the S/O and also addresses comments received from the SCL Lead Enforcement Agency dated August 15, 2011 (Attachment 2).

As stated in Condition 1.h of the S/O, SCL will no longer be required to submit a separate odor management plan to DPW; this revised Odor Plan of Action is now the consolidated OPA addressing all agency comments.

1.1.1 Stipulated Order for Abatement, March 24, 2010

The March 24, 2010 Stipulated Order for Abatement (Order) (Attachment 3) includes numerous conditions be met which required several studies and changes to operational practices at the site. Some of these conditions have been fully met while others are ongoing and continue to be part of SCL’s odor management program. Those actions that are ongoing will continue to be conducted to ensure compliance with the March 24, 2010 Stipulated Order.
1.1.2 Comments on January 6, 2012 OPA

By letters dated January 20 and March 7, 2012, comments on the January 6, 2012 OPA were provided to SCL (Attachment 4). The January 20th letter only includes comments from SCAQMD; the March 7th letter includes comments from SCAQMD, the Sunshine Canyon Landfill Local Enforcement Agency (SCL LEA), the Los Angeles County Department of Public Works (DPW) and the Los Angeles City Department of City Planning. Responses to these comments were transmitted with the revised OPA on March 27, 2012, and are also included in Attachment 5.

1.1.3 Comments on March 27, 2012 OPA

By email dated May 4, 2012, SCAQMD transmitted comments from DPW and the SCL LEA on the March 27, 2012 OPA. A meeting was held on May 9, 2012 to discuss the comments. The comments and responses to those comments are provided as Attachment 13 to this final OPA.

1.2 Management of Odor Issues

SCL has assigned an Environmental Manager (EM) the responsibility for the management of all actions related to odor issues at the site. The EM has the responsibility to ensure all actions related to odor management are being addressed at the site on a day-to-day basis, including the implementation of this OPA.

1.2.1 Corrective Action Manager (CAM)

Condition 4.a of the December 3, 2011 S/O requires SCL to have one Corrective Action Manager (CAM) on-site 7 days a week, 24 hours each day. The responsibility of the CAM will be to provide on-site monitoring for odor abatement purposes. These employees are authorized to address, respond to, investigate and take corrective action(s) as necessary and feasible to remediate the source of odors and document the site’s response to odor issues reported to the site in a timely manner. As stipulated in Condition 4.b.ii of the S/O, the CAMS will fully be empowered to expend company resources without delay to take necessary and feasible corrective action to remediate an identified source of odors reported to SCL.

The overriding responsibility of the CAM regardless of the day or time is to assess the nature and source of odors (when detected), and take appropriate actions that are practical and reasonable to mitigate the source of the odor. A CAM’s responsibilities will include:

- Respond to odor complaints;
- Investigate potential sources of odor when a complaint is received;
- Follow-up with complainants after investigation is complete;
- Coordinate with appropriate site personnel to determine if an immediate action can be taken to mitigate a source of odors when a specific source is identified;
• Work with site personnel to ensure all mitigation measures are in good operational order;
• Work with site personnel to ensure all mitigation measures are deployed properly;
• Conduct daily on-site inspections to identify potential sources of odors and document inspection results;
• Notify appropriate site personnel of any source of on-site odors immediately after detection;
• Work with site personnel to determine the immediate or longer-term measures to be employed to mitigate a source of odor;
• If appropriate, ensure an immediate mitigation is employed;
• In the case of a longer-term measure, continue to measure progress of the implementation of the measure to ensure it is completed;
• Assess effectiveness of mitigation measures.

To facilitate coordination of the completion of outstanding corrective actions, a corrective active shift report will be completed at the end of each CAM shift providing the status of any corrective actions that have either been completed or are on-going. A copy of the report form is provided in Attachment 6.

Given the fact that a CAM is required to be on-site 24 hours a day, 7 days each week, there will be periods of time when a CAM will be limited as to what actions can be taken to mitigate odors if they occur, e.g. night-time. A significant portion of SCL is unlit, the roads are not paved and terrain is steep, making an on-site odor investigation during the times when there is no natural light prohibitive due to safety. Although, permit conditions restrict equipment operations to specific times, Condition 17.3.b of SCL’s Solid Waste Facility Permit (SWFP) allows for “emergency operations, equipment repairs, and mitigation measures necessary to avoid environmental impacts, which cannot be accomplished” during normal working hours, “may be performed at any time with prior written approval of the EA” (e.g. LEA). If a situation does arise where emergency repairs need to be made to mitigate a source of odor outside of regular facility hours, and it is determined safe to conduct such repairs at those hours, SCL is committed to working with the LEA and other regulatory agencies to obtain the necessary written approvals to conduct such repairs.

A minimum of one CAM will be on duty 24 hours per day, 7 days each week. A schedule of personnel assigned to the CAM position will be maintained on a weekly basis to ensure all shifts are covered. SCL is committed to fully cooperating with SCAQMD personnel concerning the actions specified in this OPA. Records kept by the CAMs will be available for inspection by SCAQMD personnel during normal business hours.

1.3 Organization of Odor Plan of Action

This OPA is divided into two sections; Section 2.0 outlines the best management procedures that facility personnel will use to prevent, monitor, and address odor issues. Section 3.0 presents a
description of the current and planned projects and activities related to the landfill gas (LFG) collection system. It should be noted that it is not the purpose of this plan to provide an assessment of the landfill gas collection system. This task has been completed in a separate submittal to the District as required by Condition 1.b of the S/O.

By implementation of the odor management tasks described in Sections 2.0 and 3.0 in this Plan, SCL personnel are committed to:

- Maintaining all systems necessary to minimize odors from facility operations
- Monitoring odor levels on-site during normal operations and activities;
- Monitoring and responding to odor levels offsite;
- If odors are detected and/or reported, determining the source within the landfill from which odor is generated;
- When practical and safe, taking expeditious corrective actions to eliminate or minimize off-site odors at their source;
- Gauging the effectiveness of the corrective actions and the progress toward control of odors.

2.0 Odor Control and Management

The purpose of this section is to outline the best management practices to monitor, control, and prevent odor issues at Sunshine Canyon Landfill. Some of these practices are currently in place and are actively being conducted; some of the practices discussed in this section are currently being evaluated and will be implemented in the near future if deemed prudent.

SCL has assigned a management staff person to address odor issues, respond to complaints, and ensure corrective actions, if any are needed, are taken and documented. This responsibility will shift amongst several positions depending on time of day and day of week, since no staff person can legally be mandated to work 24 hours per day, 7 days a week. Due to the hazardous terrain, unlit and unpaved roads, and permit restrictions on equipment operations, it should be noted that all but catastrophic investigations and repairs will occur only during normal operating hours.

The following sections describe SCL’s odor control and management program. It should be noted that not every practice will apply or be will be feasible to be implemented at all times due to site conditions, weather, or other factors. SCL is committed to continue to evaluate these and other odor mitigation measures and/or practices as they become available and are deemed practical and effective for use at SCL.

Under each section is a discussion of additional actions SCL has taken or is proposing to take. In some cases, these actions include evaluations of specific measures that may be implemented in the future, but as to
which a final decision on effectiveness or feasibility has not been made as of the writing of this revised OPA. Revisions to this OPA will be made as actions are finalized and become part of the site’s overall odor management program.

2.1 Odor Mitigation Systems

2.1.1 Vegetative Bands

SCL has long maintained vegetated areas on its property located between the active landfill and the Granada Hills neighborhood to the southeast of the site. In accordance with land use permit requirements, SCL has installed and maintained over 1000 oak trees onsite to create a buffer envisioned to reduce particulate matter. In addition, over 10,000 mitigation oak and big cone fir trees have been planted and are maintained in groves surrounding the landfill.

Prior to the March 24, 2010, Stipulated Order, it was proposed that the loss of vegetation adjacent to the landfill in regional wildfires (Seson and Sayer fires) may have contributed to the ease of transport of off-site odors. In accordance with Condition 9 of the Order, a Vegetation Planting Plan for the wildfire-damaged areas between the landfill and the neighborhood was submitted to SCAQMD in August 2010 (Attachment 5) and approved in November 2011. All planting work was completed by January 2011 in accordance with the plan. SCL is continuing to monitor and maintain these vegetative areas.

2.1.2 Misting Systems

SCL’s existing odor misting systems consist of portable spray and misting systems, fixed misting systems that extend from the entrance to the scalehouse and a fixed misting system installed on the southern berm area of the City South portion of the site. A brief description of these systems is provided below.

Prior to the March 24, 2010 Stipulated Order, the site did not use odor neutralizing agents except as part of the daily cover operation. As a result of the Stipulated Order, SCL now uses various methods of applying odor neutralizing chemicals when adverse odors are present and also under certain mandated conditions:

- Water containing an odor neutralizer is applied to the main haul road and all access roads every two hours when SCL is open for waste disposal except during measurable precipitation (Order Condition 5);

- A working face perimeter misting system and a separate DustBoss portable mister are used at the working face. Both of these systems use an odor neutralizer. These are operated continuously from 6 am to 10 am on Mondays and any mornings when adverse winds occur (Order Condition 2);
• A ridge-top landfill perimeter neutralizer misting system was installed and was operated continuously during operating hours on Mondays and on other days during adverse winds (Order Condition 3). However, in response to neighborhood concerns about the smell of the odor neutralizer in the mist, the Stipulated Order was modified (July 8, 2010) to remove this requirement until the Working Face Study and Meteorological Study are complete. As of February 1, 2011 the perimeter misting system located on the southern berm portion of the site is operated with potable water only; no neutralizer chemical is added to this system. The perimeter misters are now operated on a system that automatically turns the misters on when adverse wind conditions are present.

• In July 2011, SCL voluntarily installed a misting system along the haul road from the entrance to the point where the road turns and leads to the scalehouse. This system was further enhanced in October 2011 to include two rows of misters fixed across the main haul road.

S/O Condition 1.h.i requires SCL to extend the perimeter misting system from the scalehouse to the landfill entrance gate at San Fernando Road within 10 days after issuance of the S/O. This work was completed on December 13, 2011. These misting systems from the entrance to the scalehouse are operated from 6:00 AM to 10:00 AM and from 6:00 PM to 10:00 PM. The operation of this system is based on the hours when historically the majority of complaints from the neighborhood have been made. An odor neutralizer is added to this system.

### 2.1.2.1 Misting Systems - Additional Actions

SCL is continuing to evaluate the site’s portable misting systems to determine if there are additional mitigation measures related to these systems that can be implemented to reduce odors specifically from the working face. This evaluation is currently in progress have included the following:

• Discussions with the manufacturer of the Dust Boss system (Dust Control Technology) to determine if the existing delivery system can be modified to produce a finer mist that could potentially have a greater impact on controlling odors generated at the working face. SCL personnel are also working with Mr. Dave Hill from Global Odor Control (GOC) to modify this system as well as determining the best neutralizer solution to use with the system. Updates on these activities are provided in the response to Comment 3, Additional Details on System Modifications (March 7, 2012 letter) (Attachment 5). Updates will continue to be provided in the monthly odor reports submitted to SCAQMD.

• Discussions with SCAQMD regarding conducting a smoke test to “see” the pathway the potential odor-containing air takes when leaving the working
face. This information would be valuable to determine the best placement of either a misting system or another type of system that could intercept odor-containing airflow leaving the working face area.

An email was sent to SCAQMD (Attachment 6) on December 9, 2011 requesting permission to conduct the smoke test. Since it is believed the test could result in a violation of SCAQMD Rule 401, Visible Emissions, additional discussions need to occur with the SCAQMD before such a test is either conducted or a viable option is approved. SCL personnel will continue to work with SCAQMD to determine how this “pathway” test can be accomplished.

### 2.2 Operational Controls

#### 2.2.1 Queuing of Trucks

Prior to the March 24, 2010 Stipulated Order, SCL did not restrict traffic flow, other than adhering to the operating hour limits specified in site permits. Order Condition 5.a prohibited the queuing of any waste vehicles on landfill property prior to 6:00 AM. Condition 1.h.i of the December 3, 2011 S/O allows for SCL’s gates to be open at 5:00 AM on weekdays and 6:00 AM on weekends to allow for the on-site queuing of vehicles between the entrance gate and the landfill scalehouse. This condition was included to prevent waste trucks from parking in off-site areas close to SCL which could contribute to odors in the nearby neighborhoods and also improve vehicular safety. The on-site misting system from the site entrance to the scalehouse is required to be operated during this vehicle queuing period.

#### 2.2.2 Transfer Truck Restrictions

The March 24, 2010 Stipulated Order Conditions 1.a and b prohibit the receipt of trash from transfer stations under the control of Republic Services affiliates during the hours of 6:00 AM to 9:00 AM on Mondays and any days when adverse winds are measured. In addition, Order Condition 1.d. requires neutralizer be applied to transfer trucks under the control of Republic if those trucks departed the transfer stations during adverse wind conditions with the intent to deposit a load at SCL. This practice continues to be followed when adverse wind conditions are present as noted above.

#### 2.2.3 Working Face Size Restrictions

Prior to the March 24, 2010 Stipulated Order, the working face varied in size depending on traffic volume. At peak traffic, the size the working face could be approximately 100 by 150 feet or larger.

Condition 1.c. of the March 24, 2010 Order restricts the working face to 30,000 square feet or less from 6:00 AM to 10:00 AM on all Monday mornings and any other mornings during adverse wind conditions. Working face size as a contributor to odors was evaluated in the
Working Face Study (Order Condition 1.c); it was concluded the size of the working face is not related to odor source strength.

2.2.3.1 Working Face Size Restrictions - Additional Actions

No additional actions regarding the size of the working face have been implemented or are proposed to be implemented. Ultimately, SCL would like to return to past working face operational practices if it is not found to be contributing to odor issues.

2.3 Odorous Load Management Program

Condition 1.h.ii of the December 3, 2011 S/O requires SCL to amend its odorous load management procedures to include and implement certain criteria, including the following:

- Provide additional details describing the processes for screening odorous loads prior to delivery and at the scalehouse, including clear procedures, criterion utilized for accepting or rejecting loads and the number of personnel designated;

- Descriptions of the frequency and nature of any occurrences over the last two years in which SCL rejected any odorous loads, covered such loads with soil, and/or contacted any waste generators for mitigation;

- Plans to enhance the existing practices for controlling odors at the working face such as covering odorous loads with soil rather than with municipal solid waste as prescribed by California Code of Regulations (CCR), Title 27, Section 20680.

The following sections provide the information on the processes used at SCL to manage odorous loads including:

- Republic Service’s Special Waste Screening process (Section 2.3.1);

- Rejection of odorous loads (Section 2.3.2);

- Odorous load screening prior to delivery (Section 2.3.3);

- Odorous load screening at the scalehouse (Section 2.3.4);

- Additional actions for controlling odors at the working face (Section 2.3.5).

2.3.1 Special Waste Screening Process

SCL uses Republic Services’ Special Waste Screening Process to prescreen non-traditional solid waste loads. Prior to these wastes being accepted at the site, Republic Services salespersons work with customers to obtain necessary data and characteristics of the wastes for evaluation. Complete documentation of all special waste loads is required prior to the waste being accepted for disposal. Acceptance of the waste by the site’s General
Manager is also required. The potential for the waste material to generate odor is one issue that is taken into consideration in the Special Waste Screening Process. A recent example of the value of this process is the rejection of a load of raw fish based on its odorous characteristics.

2.3.2 Rejection of Odorous Loads

Condition 1.h.ii.b of the December 3, 2011 S/O, requires descriptions of the frequency and nature of any occurrences over the last two years in which SCL rejected any odorous loads, covered such loads with soil, and/or contacted any waste generators for mitigation.

- In September 2011, a site inspection revealed an area in the County portion of the site where loads of grindings from a facility’s dirty municipal recycling facility (MRF) were left after some of the material was used for liner cover material creating an odorous condition. The source of this material was determined and the waste has been prohibited from the site;

- In April 2012, site operations personnel noted loads from a specific transfer station were highly odorous. The Division Manager of the transfer station was notified and it was discovered a specific wastestream from a food processing facility had been received at the transfer station earlier that day and mixed in with the trash. This wastestream is no longer allowed to come to SCL.

Documentation of odorous loads that are rejected due to concerns they may contribute to off-site odors has been incorporated into the site’s Odorous Load Management Program and is part of the training for the program. The Odorous Load Management Program is described in the following section.

2.3.3 Odorous Load Screening Prior to Delivery

SCL is a Class III municipal solid waste landfill. The facility’s Solid Waste Facility Permit (SWFP, Condition 14, Prohibitions) prohibits certain wastes including those that would inherently be considered odorous (e.g. sludge, liquid wastes, dead animals). Due to the nuisance odor complaints and subsequent regulatory actions, specific procedures for screening odorous loads prior to delivery and at the site’s scalehouse have been developed to define the criterion to be applied to identify odorous loads and the procedures to be followed at the working face to control potential odor emissions from these loads.

Waste from SCL is received from three sources: 1) Republic-owned and operated transfer stations, 2) privately operated hauling companies, and, 3) City of Los Angeles operated transfer stations and direct hauling. Screening for odorous loads prior to delivery from these three sources needs to be addressed separately due to the fact that SCL has little control over the privately operated hauling companies and the City of Los Angeles sources.

2.3.3.1 Republic-Owned Sources
A process for screening loads for odor strength has been developed with the cooperation of SCL and transfer station personnel. This process includes the following:

- Training of appropriate transfer station personnel on criteria to identify odorous loads that could potentially create off-site odor issues at SCL. The training materials presented to transfer station supervisors at a meeting held in April 2012 is included in Attachment 14;

- The plan includes an odorous load tracking sheet (Attachment 15) that is filled out and sent to Sunshine Canyon Landfill to document the load that has been identified. It is sent either via email or with the driver to give to the scalehouse personnel;

- Notification to SCL personnel when an odorous load exceeding the threshold criteria of ‘4’ on SCAQMD’s odor classification scale;

Once SCL personnel have been notified that an odorous load is coming to the site, the procedures described in Section 2.3.5 will be followed.

### 2.3.3.2 Privately Operated Hauling Companies

A meeting was held with the SCL LEA on December 15, 2011 to discuss potential procedures that could be implemented by SCL to address screening of odorous loads prior to delivery at the site from privately operated hauling companies.

The SCL LEA provided the following recommendations with respect to addressing odorous loads from third party/independent hauling companies:

- The SCL LEA is willing to work with SCL personnel to visit third party/independent hauling companies located within the City of Los Angeles to determine what actions can be taken at these locations to reduce and or mitigate odors in loads from these locations. The plan to perform these visits and subsequent actions will be developed and any actions taken and results will be reported to SCAQMD.

SCL personnel are committed to working with the SCL LEA and third party/independent generators and hauling companies to find reasonable alternatives that can be employed to minimize the impact these wastes may have on the site’s odor issue. Potential actions that may be evaluated include the following:

- Work with generators to minimize length of storage of waste at its source;
- Pre-treatment prior to delivery to SCL;
- Material segregation;
- Covering
- Handling techniques
In their August 15, 2011 comments, the SCL LEA recommended working with CalRecycle’s Waste Characterization Branch to help in the development of a standard protocol for odor load checking. SCL personnel will work with the SCL LEA and obtain as much information as possible from CalRecycle to develop protocols for odorous load checking.

2.3.3.3 City of Los Angeles Operated Transfer Stations and Direct Hauling

SCL has a contract with the City of Los Angeles (City of L.A.) for the disposal of wastes generated within the City. Wastes are brought to SCL in City direct haul trucks and also in transfer trucks that contract with the City of L.A. to haul waste from two City-operated transfer stations.

In September 2011, it was noted that many of the City of LA direct haul trucks have a “trough” on the back of the truck for the purpose of catching liquids that drain from the waste material. These troughs were creating odorous conditions not only coming into the facility, but also leaving since they not only accumulated liquids, but wastes were caught in the troughs and not cleaned out on a regular basis. SCL contacted the City and requested drivers be instructed to clean these troughs out at the working face prior to the trucks leaving the working face area. SCL personnel at the working face have been instructed to visually inspect the City trucks to ensure these troughs are being cleaned on a regular basis.

- The City of LA trucks and transfer loads were also discussed with the SCL LEA during the December 15, 2011 meeting. As with the independent hauling companies, the SCL LEA will work with SCL personnel to visit the appropriate personnel at the City of LA to determine what actions can be taken to reduce and or mitigate odors in loads from these locations. The plan to perform these visits and subsequent actions will be developed and any actions taken and results will be reported to SCAQMD.

2.3.4 Odorous Load Screening at SCL Scalehouse

Actions to screen potential odorous loads at the scalehouse are as follows:

- Scalehouse personnel have been trained to identify odorous loads based on waste classifications (e.g. food waste, treated medical waste, etc.) and on the use of SCAQMD’s odor classification scale shown on Table 2.1 below;

- Documentation of these loads including the source, waste classification, odor scale intensity and any other relevant factors are maintained by SCL scalehouse personnel and communicated to the EM on a daily basis for tracking and evaluation. Scalehouse personnel will use the same Odorous Load Tracking Sheet previously referenced (Attachment 15);

- Evaluation of the most odorous loads will be conducted on a weekly basis to determine which loads are consistently rated as highly odorous. A management decision will be made with respect to the disposition of such waste generators. As
stated in Section 2.3.3, SCL is committed to working with generators of odorous loads to either resolve issues or potentially restricting the waste stream by limiting the tons per day or the delivery time or ultimately, not allowing these generators to bring waste to SCL.

### TABLE 2.1 – SCAQMD ODOR CLASSIFICATION

<table>
<thead>
<tr>
<th>SCAQMD ODOR CLASSIFICATION</th>
<th>DESCRIPTION</th>
</tr>
</thead>
<tbody>
<tr>
<td>0. No Odor</td>
<td>No detectable odor.</td>
</tr>
<tr>
<td>1. Very faint</td>
<td>An odor that would ordinarily not be noticed by the average person, but could be detected by the experienced inspector or a very sensitive individual.</td>
</tr>
<tr>
<td>2. Faint</td>
<td>An odor so weak that the average person might detect it, if his or her attention were called to it, but that would not otherwise attract his or her attention.</td>
</tr>
<tr>
<td>3. Distinct</td>
<td>An odor of moderate intensity that would be readily detected and might be regarded with disfavor (A possible nuisance in inhabited areas.)</td>
</tr>
<tr>
<td>4. Strong</td>
<td>An odor that would force itself upon the attention and that might make the air very unpleasant (a probable nuisance, if found in inhabited areas).</td>
</tr>
<tr>
<td>5. Very Strong</td>
<td>An odor of such intensity that the air would be absolutely unfit to breath.</td>
</tr>
</tbody>
</table>

#### 2.3.5 Additional Actions for Controlling Odors at Working Face

As discussed in Section 2.1.3, current operational practices for controlling odors at the working face primarily consist of the use of portable misting systems that use an odor neutralizer diluted in potable water. An evaluation of these systems is currently in progress (Section 2.1.3.1).

Additional actions for controlling odors at the working face are currently being implemented and developed and include the following:

- Prior to accepting waste each day, an area of the working face is designated for odorous loads;
- If a highly odorous load is noted by scalehouse personnel (Section 2.3.4), an operations supervisor is notified of the company name and truck number;
- The truck is allowed to proceed directly to the working face without delay (if any exists at the time);
The truck is directed to the area of the working face that has been designated for odorous loads;

A soil layer is placed over the odorous load as soon as it is processed;

Additional MSW is placed over the soil layer to provide additional coverage for the odorous load.

It should be noted that transfer trailers require tippers to unload. If an odorous load in a transfer trailer is identified, the process for handling this load will include moving the waste from the tipper area to the designated area as quickly as possible.

This process has been fully implemented at the site. Documentation of the number of loads that require this special disposal practice will be kept and the EM will track the loads that are handled in this manner along with the name of the generator, truck number, waste classification and any other relevant information.

2.4 Odor Monitoring, Complaint Management and Analysis

The purpose of this section is to document the system that SCL currently uses to:

- Monitor off-site odors;
- Monitor on-site odors;
- Take corrective actions to eliminate or minimize odorous sources;
- Gauge effectiveness of the corrective actions and the progress toward control of odors;
- Manage odor complaints and complaint response;
- Odor hotline and complaint response

2.4.1 Off-Site Odor Monitoring

The following sections describe SCL’s current off-site odor monitoring program.

2.4.1.1 Odor Patrol Schedule

The current schedule for off-site odor patrols is:

Sunday – Saturday: 6:00 AM to 10 AM

5:30 PM to 11 PM

This schedule far exceeds the hours required for off-site odor monitoring by Condition 10 of the March 24, 2010 Stipulated Abatement Order (Order). The Order requires odor surveys be conducted continuously from 7:00 AM to 9:00 AM Monday through Friday except when the facility is closed. The existing off-site odor patrol
hours may be modified when it is deemed appropriate, and may choose to reduce the hours for the patrols to those required by Condition 10 for the life of the S/O.

It should be noted that odor patrols are not conducted during rain events, holidays and may not occur if special circumstances are encountered. When a scheduled patrol does not take place, the cause will be noted and reported in the monthly report submitted to SCAQMD (Section 2.4.1.7).

2.4.1.2 Odor Monitors

Prior to an individual beginning work as an odor monitor, they will be tested for odor sensitivity using an odor pen test kit (http://www.nasalranger.com/). Any individual scoring below the lower 5th percentile on a bell curve for odor detection sensitivity will not be hired as an odor monitor.

All personnel involved in odor monitoring and response will receive the following training prior to beginning work:

- Use and maintenance of Kestrel meter;
- Use and maintenance of Nasal Ranger;
- SCAQMD Landfill odor wheel;
- Potential on-site odor sources and characteristics of these odors;
- Use of worksheets/iPad application;
- Odor complaint response and documentation.

2.4.1.3 Off-Site Odor Patrol Monitoring Locations

Odor patrol members conduct off-site patrols in two areas of the Granada Hills neighborhood southeast of the site. Odor monitoring is conducted at specific locations, however the odor monitors note odors at all locations when they are detected during the shift. It should be noted that the odor monitors document all odors they encounter including those that are readily identifiable as local to the neighborhood (e.g. skunk, local vegetation, etc.)

The specific monitoring locations have been determined based on a review of historical complaints made to SCAQMD. Additional locations may be added as new information is gathered.

2.4.1.4 Off-Site Odor Patrol Equipment
Odor patrol members will use the following equipment, as appropriate:

- Kestrel (Model No. 4500) – used to determine wind speed, wind direction, temperature and percent humidity;
- Nasal Ranger – used to evaluate the relative strength of an odor;
- iPads (effective January 2012) – used to record all odor observations that are subsequently downloaded to a spreadsheet.

### 2.4.1.5 Off-Site Odor Patrol Logging System

Odor observations are recorded on logsheets developed for SCL’s program (Attachment 7). Key items noted include location, time, and potential odor sources (both landfill and non-landfill), as well as the weather data at the specific location. An odor intensity (e.g. faint, distinct) is noted as well as an odor descriptor (from SCAQMD’s odor “wheel” included in Attachment 8).

Beginning in January 2012, odor patrol monitors have logged odor observations on iPads using an application developed specifically for SCL’s program. The “app” mirrors the existing logsheets with respect to the information that is recorded during the patrols. The information will be downloaded to a spreadsheet which will be maintained on a daily basis. This will allow SCL personnel to efficiently track the off-site odor observations being documented by the odor monitors.

The app is available as follows:

- odorpatrol@gmail.com (note: this will only need to be done first time)
- odorpatrol#1 (note: this will only need to be done first time)
- Select View Observation Raw Data

### 2.4.1.6 Off-Site Odor Complaint Response

As stated in Section 1.2.1, it is the CAM’s responsibility to take and respond to odor complaints that are made to SCL directly. Odor complaints are received via the following:

- SCL’s 24-hour hotline (800) 926-0607. This number generates automatic emails to key site staff;
- Calls made directly to site staff by residents or agency inspectors;
• Calls to the SCAQMD hotline (1-800-CUT SMOG). SCAQMD makes anonymous versions of this information available to SCL after it is processed in-house. SCAQMD has agreed to provide this information (but without the name of complainant and identifying only the complainant’s street block, not the complainant’s specific address) by the 10th day of each month for the month prior;

• Complaints made directly to SCL odor monitors during odor patrols.

Table 2.2 presents a summary of the complaint types and the subsequent actions that are taken in response to the complaints. It should be noted that very few complaints are made directly to SCL’s 24-hour hotline or to SCL site personnel directly. The majority of complaints made are not known to SCL personnel unless they are reported by a SCAQMD inspector or when the complaint list from SCAQMD is received, which is generally a day or several days after the odor complaint is lodged with the SCAQMD.

**TABLE 2.2 – ODOR COMPLAINT TYPES AND ACTIONS TAKEN**

<table>
<thead>
<tr>
<th>COMPLAINT TYPE</th>
<th>ACTION</th>
</tr>
</thead>
<tbody>
<tr>
<td>Made to Odor Monitor during odor patrol</td>
<td>Odor monitor documents complaint on form. If odor is occurring during complaint is being made, Odor Monitor logs information and reports complaint to site personnel</td>
</tr>
<tr>
<td>Calls Made Directly to SCL Staff by Residents or Inspectors</td>
<td>Complaints made directly to SCL staff by either a resident or an inspector are followed up immediately after the complaint is received if it is during normal operation hours, or it is received at a time when an appropriate SCL staff person is on-site to respond to the call. If the complainant agrees, a visit to the location will be made and an odor observation report will be filled out. SCL personnel will provide the resident with any available information regarding the nature and source of the odor and the actions the site is taking to mitigate the issue.</td>
</tr>
<tr>
<td>Call to SCL’s 24-hour hotline</td>
<td>If phone number is provided by complainant, call is returned as soon as possible. If the call is received during the hours when an Odor Monitor is on odor patrol, the Odor Monitor will be dispatched to the complainant's location to take the complaint and determine if the odor remains. The Odor Monitor reports the complaint and findings to site personnel.</td>
</tr>
<tr>
<td>Calls made to SCAQMD Hotline</td>
<td>These are received from SCAQMD if an inspector notifies site personnel of complaints and/or when the monthly complaint log is received from SCAQMD. Specific addresses of complainants are not provided by SCAQMD therefore SCL personnel are not able to follow up on these complaints.</td>
</tr>
</tbody>
</table>

SCL maintains logs of complaints it receives directly. Whenever possible, the following information will be gathered either from the initial call data or follow up actions:

• Complainant – name
• Complainant – address
• Complainant – location of complainant
• Complainant – date of complaint
• Complainant – time of day of complaint
• Complainant – weather conditions (at the time of the complaint)
• Complainant – wind direction and speed (at the time of the complaint)
• Duration of odor
• Characteristic of odor (what did it smell like, per SCAQMD odor wheel in Attachment 4)
• Intensity of odor (per SCAQMD intensity scale in Attachment 4)
• Characteristic of wind (steady, variable, swirling)
• Any other general observations

Odor Complaint Tracking Forms are provided in Attachment 9. These forms, or similar documentation, will be utilized to record information and analyze potential odor issues. Note that in some cases, all information may not be available if a complainant wishes to remain anonymous.

At minimum, in the case of all complaint episodes, SCL staff will document wind conditions at the landfill and, if possible, in the area of the complaint in order to better ascertain if the landfill was the likely source of the odor.

Once an odor complaint is received, an on-site odor survey will commence as soon as possible during operating hours. Complaints received after business hours will be investigated the next business day unless the complaint warrants a more immediate response. The odor complaint will be recorded on the Odor Complaint Tracking Form. It is the responsibility of the CAM to follow up on complaints including communicating with the complainant any actions that have been, or will be taken, to mitigate an odor, as well as initiating all the appropriate actions stated in Section 1.2.1.

If a disruption of an environmental control system (gas, leachate, condensate) is found to be the source of odors, the site will document this not only on the Odor Complaint Tracking Form but also complete a Special Occurrence logsheet and make the appropriate agency notifications. SCAQMD will be copied on monthly reports to the site Local Enforcement Agency (LEA) which contain the Special Occurrence logsheets. If the source of the odor is determined not to be from the landfill, this information will also be logged and communicated to all involved parties.

2.4.1.7 Reporting

SCL has submitted a monthly summary report of the information reported from the odor patrols as well as an evaluation of the potential causes of off-site odors since July 2011. This report includes the monthly summary of complaints made to SCAQMD which is provided to SCL personnel on or around the 10th of the month. This report also includes the following information:

• A summary of odors events attributed to the landfill;
• A summary of all odor events recorded by the Odor Monitors during the odor patrols;
• The number of odor detections in the neighborhood attributed to each event,
• Details on site activities that could reasonably be contributing to off-site odors;
• Actions that are being taken by SCL to address and mitigate the source of odors and the migration of odors to off-site locations.

The June 2011 OPA stated this monthly report will be submitted by the 15th of each month for the month prior. This report will continue to be submitted to SCAQMD by the 20th of the month. Since the SCAQMD complaint log is not received until the 10th of each month, additional time has been required to evaluate all the data, prepare the report and receive the necessary reviews prior to submittal.

2.4.1.8 On-Site Odor Monitoring

All SCL site personnel are responsible for reporting odors they detect on-site. As stated in Section 1.2.1, the CAM will conduct daily on-site odor monitoring. When on-site odors are noted, appropriate site personnel are notified and an investigation is conducted to determine the appropriate actions that can be taken.

2.5 Community and Agency Outreach

SCL site publishes a quarterly newsletter and is represented at monthly neighborhood council meetings and bimonthly community advisory committee (CAC) meetings. In addition, the site maintains a website which includes the most recent newsletter and contact information.

2.5.1 Additional Actions – Community and Agency Outreach

In the fourth quarter of 2011, SCL updated its quarterly newsletter to provide more information than that previously provided in these newsletters (Attachment 10). The website has also been improved to provide current information. SCL has been working with a Republic Services Community Relations Manager to update the newsletter, website and provide consultation on other community relations efforts that can be accomplished. Input from other Republic Services personnel who have experience in dealing with community relations tasks will continue for the foreseeable future.

SCL is committed to improving the working relationship between the site, the community, and the regulatory agencies. In order to accomplish this goal, SCL will:
• Notify the local community and appropriate state and local regulatory authorities in advance when planned work may generate odors;

• Respond to complaints via phone or by personal visit, and investigate and document each complaint thoroughly (Section 1.2.1);

• Avoid adversarial relationships;

• Establish a single point of contact and/or center of responsibility for dealing with odor complaints (Section 1.2);

• Establish and implement a formal odor complaint management program and complaint response system (Section 2.4);

• Maintain a proactive community relations program and schedule to address odor issues. Activities under this program include:
  o Continue to develop relationships with local authorities, complainants, and community leaders to create a reliable response system to complaints;
  o Enlist neighbors to help identify and report issues about odor directly to the site;
  o As necessary, enlist the help of qualified consultants and vendors who can assist odor control efforts;
  o Document efforts to mitigate identified issues;
  o Document operational activities performed at the time the odor occurred (e.g., gas system work);
  o Inform the community about progress or changes to improve the odor issue.

If any community outreach events are scheduled by Republic to provide information on odor issues, SCAQMD will be given 7 days advance notice so attendance by the appropriate SCAQMD personnel can be arranged.

3.0 Landfill Gas Projects and Activities

The December 3, 2011 S/O includes numerous requirements for SCL to comply with regarding the site’s GCCS. These requirements and the status of each are summarized Table 3.1. Please note this is only intended to provide a summary overview. The complete S/O is included in Attachment 1 for reference.

The LFG system at SCL is subject to multiple levels of regulation. The site is covered by a Title V air permit, the New Source Performance Standards for Gas Collection and Control Systems (NSPS/GCCS), and the Federal Maximum Achievable Control Technology (MACT) standards. Site compliance activities, recordkeeping, agency notifications, and reports related to those programs remain unchanged by this OPA.
### TABLE 3.1 - SUMMARY OF DECEMBER 3, 2011 S/O GCCS CONDITIONS

<table>
<thead>
<tr>
<th>CONDITION</th>
<th>DUE</th>
<th>STATUS</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.a</td>
<td>Provide Master Plan for the expedited installation of vertical wells and horizontal collectors</td>
<td>12/9/2011</td>
</tr>
<tr>
<td>1.b.i</td>
<td>Evaluation of lateral pipe sizing</td>
<td>1/15/2012</td>
</tr>
<tr>
<td>1.c</td>
<td>File permit application for installation of GCCS</td>
<td>12/9/2012</td>
</tr>
<tr>
<td>1.d</td>
<td>Engineering study for the evaluation of a single loop header line design</td>
<td>1/15/2012</td>
</tr>
<tr>
<td>2.a</td>
<td>Monthly surface emission monitoring</td>
<td>Begin by 12/9/2011</td>
</tr>
<tr>
<td>2.c</td>
<td>Plan to conduct semi-annual instantaneous and integrated SEM on slopes greater than 30 degrees</td>
<td>1/20/2012</td>
</tr>
<tr>
<td>2.d</td>
<td>Plan for on-going semi-annual inspection and maintenance of slopes greater than 30 degrees</td>
<td>1/20/2012</td>
</tr>
<tr>
<td>5.a</td>
<td>Provide technical information for temporary flare</td>
<td>1/16/2011</td>
</tr>
<tr>
<td>5.h</td>
<td>Submit test protocol for temporary flare</td>
<td>12/16/2011</td>
</tr>
<tr>
<td>5.i</td>
<td>Installation of Flare 9</td>
<td>Delayed to 8/03/2012</td>
</tr>
</tbody>
</table>
3.1 LFG System Construction Projects

At the present time, SCL has a multi-year contract with a 3rd party construction contractor for installation and repair of the landfill GCCS. As landfill cells are developed, the LFG system will be expanded in accordance with NSPS requirements. Activities will include the installation of new wells and collection lines along with efficiency improvements in existing landfill areas. Schedules for gas system projects will be communicated to regulatory agencies and the public as they are developed.

The construction project to install a new 36" header piping system at SCL has been underway since August 2011. Phase 1 and Phase 2 of the project were completed by December 31, 2011. The third and final phase of this project is scheduled to begin in June 2012 with a completion date of July 31, 2012.

In accordance with Condition 5.a of the S/O, a temporary flare was installed and operational prior to February 17, 2012.

In addition, other LFG projects that are currently on-going include the following:

- Design, permitting and installation of permanent Flare 9 (Condition 5.i);
- Installation of 70 additional LFG extraction wells was completed in February 2012;
- Installation of horizontal collectors in the cell area as soon as sufficient lift height is reached.

3.2 LFG Collection System Routine Activities

3.2.1 LFG Well Field Operation and Maintenance

Beginning March 21, 2011, LFG collection system balancing and tuning was being conducted weekly. This schedule was reduced to bi-weekly (twice per month) in July 2011. A Landtec GEM-2000 landfill gas instrument (or equivalent) is used to monitor each wellhead/control point. Prior to each monitoring event, the GEM 2000 is calibrated to factory standards. The LFG concentrations of methane, oxygen, carbon dioxide, balance gas, static pressure and temperature are recorded for each wellhead/control point. The LFG extraction wells are checked and adjusted to ensure they are operating within the parameters established by NSPS guidelines. Corrective actions are performed within 5 days on any well found to be operating outside NSPS guidelines; however, standard practice for the landfill will be for corrective actions to be implemented on the same day as the balancing/tuning if feasible. Any well that continues to operate outside NSPS guidelines will be monitored again within 15 days.

Vacuum and gas quality will be monitored at the blower/enclosed flare station before and after each balancing/tuning event. Any deviation to the vacuum set points or gas concentrations will be noted and discussed with well field personnel. Each wellhead/control point will be inspected for proper operation of the flex hose, sample ports, flanges and other wellhead appurtenances monthly while completing the well field monitoring/tuning. During this inspection, LFG well integrity, including any settlement or leaks, will be noted. All maintenance items identified will be communicated to well field personnel.
Well and surrounding area inspections will be conducted during well field tuning events. Each well casing and any cap penetrations and surrounding areas will be inspected for settlement or signs of damage and routine repairs will be made immediately. Repairs that cannot be made immediately will be reported to site personnel and scheduled as soon as possible.

Results of each month’s work will be compiled and made available to site management by the 15th of each month. Site management will review the information within two business days of receipt. Recommendations for LFG system improvements will be based on the data and information gathered.

Monthly information will include but are not limited to the following:

- A summary of the overall operation of the LFG collection system including flows, qualities and general observations;
- A list of service dates and description of work performed;
- The well field monitoring/tuning results for the current month including the gas qualities, pressures, temperatures flows and comments;
- Any liquid level data collected;
- A list of all wells currently out of compliance with the NSPS guideline and details on the resolution of previously non-compliant wells, if any
- Calibration logs; and
- Blower/flare station inspection results.

Necessary preventative maintenance tasks and minor repairs on the LFG collection system, including sample port replacement, flex hose replacement and general wellhead maintenance will be performed during routine well field monitoring/tuning. Major repairs will be scheduled as needed per Sections 3.3 and 3.4 below. A summary of the work performed pursuant to this section will be provided to SCAQMD on a quarterly basis.

### 3.2.2 LFG Flare Station Operation and Maintenance

SCL has three blower/flare stations, each consisting of a similar layout:

- One, 50-foot tall, 13-foot diameter McGill flare model EGF-125 equipped with a multi-jet burner, propane gas pilot, electric igniter, UV flame sensor, automatic shutdown and alarm system, automatic combustion air regulating system and temperature controller;
- Condensate knock-out drums with mist eliminator;
- Condensate pumps, 1 horsepower (Hp), 3 gallons per minutes (gpm), serving condensate knockout drums and particulate filters;
• Three blowers per flare

SCL’s blowers and flare stations will be operated, inspected and maintained in accordance with Republic Service’s Landfill Gas Standard Operating Procedures (SOP)(May 2009). The SOP provides for regular inspections and maintenance of GCCS components to maintain the consistent and reliable operation of the system.

The data collected will be included in the monthly information presented to site management. Necessary preventative maintenance tasks and minor repairs on the blower flare station will be performed to maintain safe operation. Major repairs will be scheduled as needed per Sections 3.3 and 3.4 below.

3.2.3 Condensate Sump Operations and Maintenance

Maintenance and monitoring of condensate sumps will be performed quarterly. Required maintenance and monitoring includes: verifying proper operation, recording vacuum at sump, recording depth to water and total depths at sump locations, inspecting all discharge and air supply lines, exercising associated valves, repairing or replacing condensate sump components and pulling, cleaning and calibrating condensate pumps. Information on condensate sump activities will be compiled monthly.

3.2.4 Perimeter Probe Monitoring

Monthly gas monitoring of all perimeter probes has been on-going and will continue to be performed monthly at all the perimeter gas probe locations at SCL in accordance with the site’s SCAQMD approved Rule 1150.1 Monitoring Plan, which is available upon request. The date and time, initial and sustained percent LEL, initial and sustained percentage of gas (as measured by percent methane), pressure within the probe and depth to water will be recorded at each permanent probe location. A Landtec GEM-2000 landfill gas instrument (or equivalent) is used to record pressures as well as percentages of the LEL and explosive gas in the probes. The Landtec GEM 2000 will be calibrated prior to use. Depth to water will be measured with a Solinist, or equivalent, meter.

Weather conditions will be provided for the day the monitoring occurred, including the sky conditions, precipitation, wind direction and speed, soil conditions, barometric pressures, air temperature and relative humidity.

In conjunction with the probe monitoring, a probe integrity inspection will be performed and a condition report of each probe will be provided. Perimeter probe information will be compiled monthly. The data is also reflected in quarterly reports to SCAQMD.

Preventative maintenance tasks and minor repairs will be performed as necessary to damaged probes. Major repairs will be scheduled promptly as described in Sections 3.3 and 3.4 below.

3.2.5 Surface Emission Monitoring

As required by S/O Condition 2.a, instantaneous and integrated surface emission monitoring (SEM) is being conducted monthly. This schedule exceeds the site’s SCAQMD-approved Rule 1150.1 Monitoring Plan. Condition 2 of the S/O stipulates additional required actions regarding landfill emission monitoring:
Re-grading of slopes less than 30 degrees every 6 months in areas where visible fissures or erosion are present;

The time to repair exceedances (as defined by Rule 1150.1, Sections (e)(2) or (e)(3)) will be minimized so repairs/adjustments will be made and the exceedances re-sampled within 72 hours of discovery;

For all exceedances beyond the provisions of Rule 1150.1 (e)(2) and (e)(3), SCL will notify SCAQMD within 24 hours or on the next business day and report this as a breakdown;

A topographic map identifying specific topographical features (Condition 2.b.i through 2.b.x) will be submitted by January 6, 2012 (COMPLETE);

A plan to conduct semi-annual (twice-yearly) instantaneous and integrated landfill surface emission monitoring on all slopes greater than thirty (30) degrees that are not currently being monitored is to be submitted by January 20, 2012;

A plan for the on-going inspection and maintenance of all slopes determined to be greater than thirty (30) degrees that are not currently being monitored for landfill surface emissions, are in non-active areas of the landfill, or where refuse was buried or will be buried, is to be submitted by January 20, 2012. The required plan elements are described in Condition 2.d.i through 2.d.iv of the S/O (Attachment 1).

### 3.2.5.1 Procedures for Surface Emission Monitoring

SEM is conducted by a third party contractor. A field technician monitors a traverse pattern using a calibrated organic vapor analyzer (or equivalent per EPA Method 21 requirements) fitted with a wand. The end of the wand will be held within 3 inches of the landfill surface while monitoring. Areas of distressed vegetation, fissures, LFG extraction wells and other areas with potential for surface emissions greater than 500 ppm are monitored and reported immediately to site management. Areas shown on the traverse plan, but not monitored due to hazardous conditions, are delineated on a site map along with a brief explanation (e.g. heavy vegetation, active filling, steep and slippery slopes).

Monitoring will be performed during “typical site weather conditions” in accordance with NSPS regulation. Ambient air temperature, barometric pressure, and approximate wind speed and direction will be recorded on monitoring / calibration sheets.

At a minimum, the following data will be obtained in the field and reported on the field logs. (1.) Calibration of Field Instrumentation: Technician, date, time, calibration gases and concentrations, and equipment/instrumentation identification (e.g. serial number). (2.) Background: Background concentrations of methane gas will be determined by sampling upwind and downwind outside the boundary of the landfill at a distance of at least 100 feet from the landfill perimeter. (3.) Weather Data: General weather conditions will be noted as well as ambient air temperature, barometric pressure, approximate wind speed and
direction. Specific weather data will be collected from an on-site weather station or from www.wunderground.com, or similar source. (4.) Surface Emission Monitoring Results: Measurements will be obtained continuously as the monitoring event is performed. Any location where an emission level greater than 200 ppm above background is detected is an exceedance location. Any such location will be field flagged and documented on the site plan that includes the traverse pattern. (5.) Exceedances: Exceedance locations will be marked in the field by installing a flag at the location. Additionally, the exceedance location will be documented on the Surface Monitoring Log where each exceedance will be assigned a location designation. At the end of each monitoring day, well field technicians will be provided with results from each exceedance location.

Initial re-monitoring of each location where surface emissions exceed regulatory thresholds will be conducted in accordance with S/O Condition 2.a as noted above. The well field technicians will maintain close contact with site management so that mitigation measures can be swiftly implemented. Well field technicians will provide suggestions for mitigation measures based on their monitoring and visual observations and past site specific experience. Typically, common suggestions that can be provided by technicians consist of where to add or re-compact cover material, repair fissures, or make adjustments (increase vacuum, if within operational goals) in nearby gas collection wells.

The second re-monitoring event will be conducted within 10 days of the first re-monitoring. Site management will be provided with results for each re-monitored location.

All exceedance locations that were found to be in compliance during the first or second re-monitoring event will be re-monitored within thirty (30) days from the initial exceedance. The data collected will be included in quarterly reports and provided to site management and SCAQMD in accordance with Rule 1150.1 requirements.

3.3 LFG Collection Non-Routine Activities

Non-routine activities include, but are not limited to, special work tasks which are aimed at improving collection system performance, minimizing odor potential and increasing the quantity and quality of LFG delivered to the existing blower/flare station facilities. These work tasks will be developed upon the recommendations and discussions between well field technicians, the technician project manager and site management. This work will be reviewed and prioritized such that high priority tasks are addressed in a timely manner.

Non-routine scheduled activities consist mainly of major corrective repair or maintenance work identified during routine monitoring and inspections. This work may include, but is not limited to, the following;

- Raising LFG wells;
- Repair of broken or leaking piping;
- Repair of condensate sumps; and
• Replacement of extraction wells or monitoring probes and any repair of flare station components.

This work is essential to achieving the LFG system operational goals; however, it is considered work that can be scheduled to allow for efficient procurement of materials, equipment rental, and scheduling of additional personnel that may be required. This work also includes any special assignments that may be required for the efficient operation of the site/system. These assignments could include such tasks as: engineering, system design, studies, plans/drawings and various services related to LFG recovery.

3.4 LFG Collection Rapid Response Activities

Non-routine rapid response activities consist of addressing issues that require immediate response and restoration of system operation. These include, but are not limited to:

• Response to blower failure;
• Response to flame failures;
• Response to alarm conditions and alarm failures;
• Response to flare exhaust temperature sensors or controller failure;
• Odor complaints; and,
• Repair of main gas pipe breaks that disrupt gas flow.

The urgent nature of these items is such that response to them cannot be scheduled in advance. Accordingly, a response to these conditions, as needed, will be on an event-by-event basis, seven (7) days per week. These activities are limited in nature by the assumption that the corrective actions required (labor, equipment, materials) to restore the system to operation are relatively minor in scope. If it is determined the actions required are major in scope, only the work required at that time to ensure no safety hazard exists will be performed. All repairs will be implemented as soon as practicable given necessary engineering, procurement, and permitting requirements). Breakdowns of SCL’s gas collection or leachate collection system are reported to SCAQMD within 24 hours.
Attachment 13

Response to Comments, May 4, 2012
RESPONSES TO DPW COMMENTS

DPW Comment 1: The discussions in Sections 2.3.1 Special Waste Screening Process and Section 2.3.2 Rejection of Odoriferous Loads needs clarification. The discussions suggest that Republic screens for odor as one of the methods of Odoriferous Load Management (pg 8) and rejects special waste loads if they are determined to be odoriferous (pg. 9) while referencing a definition of Special Waste that does not include odoriferous waste. We believe Republic must refine the Special Waste Screening Process to additionally screen for odoriferous waste.

Response to DPW Comment 1:

Section 2.3.1, Special Waste Screening Process, is intended to present the fact that Republic Services as a company has a process in place to prescreen non-traditional solid waste loads to ensure they are acceptable to a site before they are received. As stated in Section 2.3.1, no special waste (Republic Services’ definition) is allowed to be accepted at Sunshine Canyon Landfill without the prior approval of the General Manager. All of the appropriate approvals must be in place before such loads are brought to the site. One of the criteria the General Manager uses at Sunshine Canyon Landfill to determine if a special waste load can come to the site is whether the load is too odorous.

Please note that the response to Comment 6 was only intended to point out that Republic Service’s use of ‘special waste’ is not the same as EPA’s definition of special waste.

Changes to Final Odor Plan:

- No change has been made to Section 2.3.1 of the OPA.
- Section 2.3.2 of the OPA has been revised to delete the reference to special waste loads to avoid confusion

DPW Comment 2: Even though the amount of C&D materials accepted by Republic has decreased over the years, our records indicate Republic continues to accept these materials. According to the disposal information submitted to the County by Republic, 6,623 tons were accepted for use as Beneficial use at the landfill in January 2012. Therefore, we request Republic to explain how C&D materials are stored onsite and whether measures are being implemented to minimize odors from these materials.

Response to DPW Comment 2:

14747 San Fernando Rd., Sylmar, CA 91342 (818) 833-6500 Office (818) 362-5484 Fax
As stated in the response to Comment 7 (March 27, 2012), SCL does not take loads of C&D material. The C&D material that is reported, is for beneficial reuse and consists of asphalt and concrete rubble. This material is used for internal temporary roads and wet-weather deck areas and other infrastructure within the site. These materials are not a source of odors.

No changes have been made to the OPA to address this comment.

**DPW Comment 3:** The Plan indicated “a process for additional actions for controlling odors at the working face is currently being developed and will include...a soil layer will be placed over the odoriferous load as soon as it is processed...additional MSW will be placed over the soil layer to provide additional coverage for the odoriferous load.” DPW is requesting that these measures proposed by Republic be permanently incorporated into its operational practices.

Response to DPW Comment 3:

SCL personnel will continue to evaluate and identify potentially odorous loads and will manage them in accordance with the procedures described in the Final OPA, Republic policies and best operating procedures.

Changes to Final Odor Plan:

- No changes have been made to the OPA to address this comment.

**RESPONSES TO SCL LEA COMMENTS**

**SCL LEA COMMENT 1:** Please note that the SCL LEA will consider supporting a return to past working face operational practices (re: daily cover requirements, etc.) once the “infrastructure” have been established for the management of odorous loads. The SCL LEA has indicated this willingness to reconsider, but only after the landfill gas collection system (of adequate capacity and collection efficiency has been established) and other odorous load operational practices are proven effective.

Response to SCL LEA Comment 1:

Comment noted.

Changes to Final Odor Plan:

No change has been made to the OPA to address this comment.

**SCL LEA COMMENT 2:** Republic states that Republic does not accept waste that meets the definition of “Special Waste”. The SCL LEA notes that Republic utilized the RCRA definition of “Special Waste” in its response. Note that this is not the...
governing definition in the State of California. The State of California has a specific definition for “Special Waste” for that is utilized in statues/regulations for the management of municipal solid waste management.

Title 14 CCR, Section 18720(73) Special Waste:

Title 14 California Code of Regulations, Section 18720(73) Special waste: "Special waste" means any hazardous waste listed in section 66740 of Title 22 of the California Code of Regulations, or any waste which has been classified as a special waste pursuant to section 66744 of Title 22 of the California Code of Regulations, or which has been granted a variance for the purpose of storage, transportation, treatment, or disposal by the Department of Health Services pursuant to section 66310 of Title 22 of the California Code of Regulations. Special waste also includes any solid waste which, because of its source of generation, physical, chemical or biological characteristics or unique disposal practices, is specifically conditioned in a solid waste facilities permit for handling and/or disposal.

The highlighted section includes materials which may not be covered under the RCRA definition and would include, in the case of Sunshine, problematic odorous materials in the municipal solid waste stream which are requiring additional attention, special handling and/or unique disposal practices. Note that in the SCL LEA Solid Waste Facility Permit, Section 17. Enforcement Agency (EA) Conditions, A. Standard Requirements (17)(A)(12), the SCL LEA has the right to modify operations to prevent the creation of a public nuisance. Various waste types (e.g. treated medical waste, materials that can be a source of odor, or specific combination of wastes which can be problematic, etc.) which require special handling can be designated as “special waste”, and thus should be identified by Republic. The SCL LEA supports the County of Los Angeles Public Works and also requests that a SCL site specific operational definition (and description of procedures) for special waste using the Title 14 definition that is much broader in scope than the RCRA definition, be provided as part of its operations plan, and be included as part of the revised Joint Technical Document.

Response to SCL LEA Comment 2:

There is no site-specific operations plan for Sunshine Canyon Landfill. The Final OPA describes the procedures that are followed to handle loads that are identified as odorous.

Changes to Final Odor Plan:

- No changes have been made to the OPA to address this comment.

SCL LEA COMMENT 3: The SCL LEA would like a copy of the Republic-owned transfer station procedures for handling and management of odoriferous loads. Please also check the potential typographical error on the first bullet paragraph on the response to comment 8, the SCL LEA believes that Republic meant 9:00 AM rather than 9:00 PM.

Response to SCL LEA Comment 3:
The procedure for the handling and management of odorous loads at Republic-owned transfer stations has been included in the OPA in Section 2.3.3.1.

Thank you for noting the typographical error. This has been corrected.

Changes to Final Odor Plan:

- Section 2.3.3.1 has been revised.

**SCL LEA COMMENT 4: Republic states that the surface emissions monitoring are performed regularly at least 72 (h)ours after a rain event in order to get a “true representation” of surface emissions. The purpose for the request for additional monitoring and/or other procedures is to identify weaknesses in the cover and/or other areas when gas generation is accelerated (e.g. increase gas generation from additional moisture, etc) - when surface emissions are not typical.**

Response to SCL LEA Comment 4:

As stated in the response to Comment 12 in the March 27 Response to Comment letter, we believe the current SEM procedure of monthly instantaneous and integrated monitoring, and re-monitoring within 3 days of the initial monitoring in accordance with the S/O, is sufficient to measure surface emissions from the landfill surface.

Changes to Final Odor Plan:

- No changes have been made to the OPA to address this comment.
Attachment 14

Odorous Load Screening, Transfer Station Training, April 2012
Odorous Load Screening
Transfer Station Training
April 2012
Why Are We Here?

- An Odor Plan of Action has been developed for Sunshine Canyon Landfill to address odor issues as required by a new Abatement Order signed in December 2011;

- An important component of the Odor Plan of Action is an Odorous Load Screening procedure;

- This procedure is to be implemented at all Republic Services transfer stations in the Los Angeles area
What Needs to Be Done

- Identify odorous loads at each transfer station;
- Document the odorous loads;
- Notify SCL that an odorous load is coming;
- Possibly reject loads if there is a strong possibility it can cause an odorous situation at SCL.
How Are Odiferous Loads Identified

<table>
<thead>
<tr>
<th>SCAQMD Odor Classification</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>0. No Odor</td>
<td>No detectable odor.</td>
</tr>
<tr>
<td>1. Very Faint</td>
<td>An odor that would ordinarily not be noticed by the average person, but could detected by the experienced inspector or a very sensitive individual.</td>
</tr>
<tr>
<td>2. Faint</td>
<td>An odor so weak that the average person might detect it, if his or her attention were called to it, but that would not otherwise attract his or her attention.</td>
</tr>
<tr>
<td>3. Distinct</td>
<td>An odor of moderate intensity that would be readily detected and might be regarded with disfavor (a possible nuisance in inhabited areas).</td>
</tr>
<tr>
<td>4. Strong</td>
<td>An odor that would force itself upon the attention and that might make the air very unpleasant (a probable nuisance, if found in inhabited areas).</td>
</tr>
<tr>
<td>5. Very Strong</td>
<td>An odor of such intensity that the air would be absolutely unfit to breathe.</td>
</tr>
</tbody>
</table>

- Use the table to determine the load’s odor intensity
- If the odor classification is a “4” (very strong), then the load is odiferous
- A “4” triggers the following procedure:
Procedure

1. Odiferous load identified – a “4”
2. Document load on tracking form
3. Notify SCL load is coming – provide following information:
   - Hauler
   - Truck number
   - Nature of load (if known)
   - Time of departure from transfer station
Loads identified as odorous **must be documented every day**

- Spreadsheet to be sent to SCL at end of each day
- Coordinated by Mike Norbeck
# Odorous Load Tracking Sheet

**ODOROUS LOAD TRACKING SHEET**

Email this sheet to PCosta@republicservices.com no later than 5:00 PM same day.

<table>
<thead>
<tr>
<th>Date:</th>
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<td>Phone Number:</td>
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<td>Company of Inbound Truck:</td>
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<td>Inbound Truck Number:</td>
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<td>Drivers Name:</td>
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<td>Area Truck Picked Up In:</td>
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<tr>
<td>Possible Accounts Onboard:</td>
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<tr>
<td>SCA2MD Class Classification:</td>
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<td>Outbound Departure Time:</td>
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<tr>
<td>ETA into Sunshine Canyon Landfill:</td>
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<tr>
<td>Call Sunshine ASAP!!</td>
<td>818-362-2141 or 818-362-2142</td>
</tr>
<tr>
<td>Last Contact:</td>
<td>818-362-2678</td>
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</table>
Who to Contact at Sunshine Canyon Landfill

Please notify the following personnel at Sunshine Canyon Landfill when an odiferous load is en route:

1. Patty Trejo – (818) 362-2141 (scalehouse)
2. Patti Costa – (818) 362 – 2075 (office)
   - (818) 822-2177 (cell)
Attachment 15

Odorous Load Tracking Sheet
# ODOROUS LOAD TRACKING SHEET

Email this sheet to PCosta@republicservices.com no later than 5:00 PM same day

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<tr>
<td></td>
<td>Patti Costa: 818-362-2075</td>
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