



GAIL FARBER, CHAIR
MARGARET CLARK, VICE-CHAIR

LOS ANGELES COUNTY
SOLID WASTE MANAGEMENT COMMITTEE/
INTEGRATED WASTE MANAGEMENT TASK FORCE
900 SOUTH FREMONT AVENUE, ALHAMBRA, CALIFORNIA 91803-1331
P.O. BOX 1460, ALHAMBRA, CALIFORNIA 91802-1460
www.lacountyiswmtf.org

January 15, 2015

Mr. Samuel Unger, P.E., Executive Office
Los Angeles Regional Water Quality Control Board
320 West 4th Street, Suite 200
Los Angeles, CA 90013

Dear Mr. Unger:

**PUBLIC NOTICE – REVISION OF MONITORING AND REPORT PROGRAM,
SUNSHINE CANYON LANDFILL, SYLMAR, CALIFORNIA (FILE NO. 58-076,
ORDER NO. R4-2008-0088, CI-2043, GEOTRACKER GLOBAL NO. L10006014618)**

The Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) appreciates the opportunity to comment on the Public Notice released by the Los Angeles Regional Water Quality Control Board (Regional Board) in a letter dated December 19, 2014. The Public Notice describes the Regional Board's proposed revisions to the Monitoring and Reporting Program (MRP) included in its Waste Discharge Requirements Permit Order No. R4-2008-0088 (WDR) issued to the Sunshine Canyon City/County Landfill (Landfill).

The proposed revisions to the WDR's MRP, among other things, include reclassification of certain down-gradient wells to up-gradient wells; removal of temporary wells from the MRP; reduction in sampling frequencies for all up-gradient and certain shallow "reference" wells from quarterly to annually; removal of groundwater level monitoring for groundwater extraction wells; reduction in frequency of data analysis of "Supplemental Parameters," except for field parameters, from semi-annually or annually to every five years; and reduction in frequency of confirmative sampling from annually to "as-needed" basis.

Accordingly, the Task Force has reviewed the proposed revisions to the subject facility WDR's MRP and offers the following comments:

- Monitoring wells PZ-4, DW-2, and DW-3 are the only down-gradient wells located southeast of the unlined City South portion of the Landfill that can detect any future/potential groundwater contamination in this particular area. Moreover, this portion of the Landfill has no protective systems in-place that can prevent any potential Landfill contaminants from spreading out to the nearest groundwater. Consequently, wells PZ-4, DW-2, and DW-3 need to be retained as down-gradient wells to further assist the Landfill in ensuring that potential contamination to the closest groundwater as well as to off-site properties in the vicinity of the Landfill are prevented.
- For all groundwater monitoring points, all “Supplemental Parameters,” except for field “Supplemental Parameters” (pH, specific conductance, temperature, and turbidity), and all constituents of concern listed in Table T-2 of the MRP (including those that are not listed in Table T-2 but are detected through sampling), should be monitored and analyzed at least once each year to avoid any potential migration of contaminants to the closest groundwater.
- Confirmative sampling should be conducted by Regional Board staff on at least two random occasions from two or more groundwater monitoring points, and as-needed, for every five years to ensure that quality and validity of data collected at the Landfill are maintained.
- The subject Public Notice does not address the impact(s) of the proposal on the appropriate Mitigation Monitoring and Reporting Program (MMRP) identified in the Landfill’s California Environmental Quality Act’s (CEQA) final documents which, as a “Responsible Agency,” were utilized by the Regional Board to grant the subject facility WDR. As such, the proposed MRP revisions need to be reviewed to ensure full consistency and compliance with the appropriate MMRPs enumerated in the Landfill’s CEQA documents which are under the purview of the Regional Board.
- Due to the short time frame to provide comments, the Task Force respectfully requests to the Regional Board for a 30-day extension to provide additional comments.

As provided by Chapter 3.67 of the Los Angeles County Code and the California Integrated Waste Management Act of 1989 (Assembly Bill 939 [AB 939], as amended), the Task Force is responsible for coordinating the development of all major solid waste planning documents prepared for the County of Los Angeles and the 88 cities in Los Angeles County. Consistent with these responsibilities and to ensure a coordinated, cost-effective, and environmentally-sound solid waste management system in

Mr. Samuel Unger
January 15, 2015
Page 3

Los Angeles County, the Task Force also addresses issues impacting the system on a Countywide basis. The Task Force membership includes representatives of the League of California Cities-Los Angeles County Division, County of Los Angeles Board of Supervisors, City of Los Angeles, the waste management industry, environmental groups, the public, and a number of other governmental agencies.

If you have any questions, please contact Mr. Mike Mohajer of the Task Force at MikeMohajer@yahoo.com or (909) 592-1147.

Sincerely,



Margaret Clark, Vice-Chair
Los Angeles County Solid Waste Management Committee/
Integrated Waste Management Task Force
Mayor Pro Tem, City of Rosemead

KM:fm

P:\EA\EA\TF\TF\Letters\2015\Comments-RWQCB'sPublicNotice

cc: Each Member of the Los Angeles Regional Water Quality Control Board
Los Angeles Regional Water Quality Control Board (Wen Yang)
Each Member/Alternate of the Los Angeles County Integrated Waste Management Task Force
Each Member of the Task Force Facility and Plan Review Subcommittee