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LOS ANGELES COUNTY  
SOLID WASTE MANAGEMENT COMMITTEE/  
INTEGRATED WASTE MANAGEMENT TASK FORCE  
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[www.lacountyiswmtf.org](http://www.lacountyiswmtf.org)

June 25, 2015

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

Dear Mr. Pupka:

**PNEUMATIC TESTING AND RECOMMENDED CHANGES AT THE SUNSHINE CANYON LANDFILL (PROJECT NO. 2013009.00-05.0)**

The Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) appreciates the opportunity to comment on the report dated March 11, 2015, titled "Pneumatic Testing and Recommended Changes at the Sunshine Canyon Landfill" prepared by Hydro Geo Chem, Inc. (HGC) on behalf of the South Coast Air Quality Management District. The Task Force would like to offer the following comments:

**General Comments:**

The study appears to be well intended; however, there are operational components that were not addressed in the study such as:

- The study mainly focused on the landfill gas collection system (LFGCS) as it relates to the soil cover and the nine inch soil cover requirement. It should have also focused on the inactive and active operating areas where potential for surface gas emissions might occur.
- In regards to the LFGCS, a key principle which should be considered is that the current system should have been sufficiently designed to collect landfill gas and operate under the default 6-inch cover requirement, which the current system appeared unable to do at this time

- Additionally, in the possibility of odor issues persisting at the landfill, a barrier to deflect wind flow from the surrounding populaces needs to be considered as well. The barrier's size, location, performance, and appearance should be some of the decisive aspects considered in the exploration of such a barrier.

### **Specific Comments:**

**Section 1.0 Introduction.** According to the report, "this revised draft incorporates HGC's Responses to SCAQMD staff Comments and to Sunshine Canyon Landfill Comments." The Task Force realizes there are communications necessary between HGC and the Landfill Operator; however, for clarity purposes, please provide the extent of the Landfill Operator's comments incorporated in this report.

**Section 3.0 Data Collection.** The study states three test areas were identified to reflect differences in landfill practices and waste composition. Provide the reasoning for the selection of these particular areas including the rationale of selecting the LFG extraction wells within each test area.

**Section 3.1 Gas Monitoring Probe and Pressure Transducer Installation.** Six gas monitoring probes were installed within the refuse at each test location. Provide the reasoning behind the location, distance, and direction of these monitoring probes from the center of the LFG extraction wells.

**Section 3.3 Shut-In Testing.** According to the report, "due to various site constraints, the shut-in tests were performed in lieu of HGC's standard method of conducting extraction tests..." Please describe the various site constraints that did not allow for HGC's standard test method and describe the impacts these constraints had on the study outcome.

**Section 6.0 Summary and Conclusions.** This section states that the LFGCS is working relatively well and is keeping the refuse under vacuum. However, this section also concludes that the daily cover is too permeable which is allowing atmospheric air intrusion and causing a reduction in radius of influence. These conclusions appeared contradicting. Either the system is collecting a large amount of air, which would relate to an ineffective LFGCS, or the surface is adequately blocking the infiltration of air, allowing the LFGCS to collect the landfill gas generated, thus overall working relatively well.

**Section 8.2 Daily Cover.** The report indicates that native compacted soil permeability properties in the three test areas do not demonstrate optimal characteristics for daily cover. The assumption is made that the three test areas represent typical characteristics for native soils at the landfill. However, compacted native soils located within the three test areas do not necessarily represent the overall soil characteristics at the entire landfill. Consequently, it would be difficult to conclude that native soil at the landfill is not ideal for use as daily cover.

Furthermore, compaction rates for daily soil cover were not addressed. The daily soil cover density is an important aspect, and should be addressed, in determining suitable daily soil cover operations with relation to the LFGCS.

**Section 8.6 LFG Mitigation and Surface Leakage on SCL Side slopes.** The report states that Side-Slopes were not investigated due to inaccessibility and HGC recommended a baro-pneumatic investigation of side-slope pneumatic properties to be conducted. As the goal of the investigation should be the quantification of side-slope surface leakage of landfill gas, methane, and non-methane organic compounds, the Task Force strongly encourages that the side-slope investigations be considered.

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 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](mailto: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

Mr. Edwin Pupka  
June 25, 2015  
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cc: Each Member/Alternate of the Los Angeles County Integrated Waste Management Task Force  
Each Member of the Task Force Facility and Plan Review Subcommittee  
Sunshine Canyon Landfill — Community Advisory Committee (Becky Bendikson, Wayde Hunter)  
Sunshine Canyon Landfill – Local Enforcement Agency (David Thompson, Gerry Villalobos, Board of Directors Members)  
County of Los Angeles Department of Regional Planning (Richard Bruckner, Maria Masis, Iris Chi)  
City of Los Angeles, Department of City Planning (Ly Lam, Nick Hendricks)