

**NORTH VALLEY COALITION OF CONCERNED CITIZENS INCORPORATED**

**STIPULATED ORDER OF ABATEMENT HEARING SUNSHINE CANYON LANDFILL**

**SCAQMD 21865 COPLEY DRIVE, DIAMOND BAR, MARCH 19, 2025**

**CASE #3448-18**

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**Exhibit A:** Automated Well Field Control System

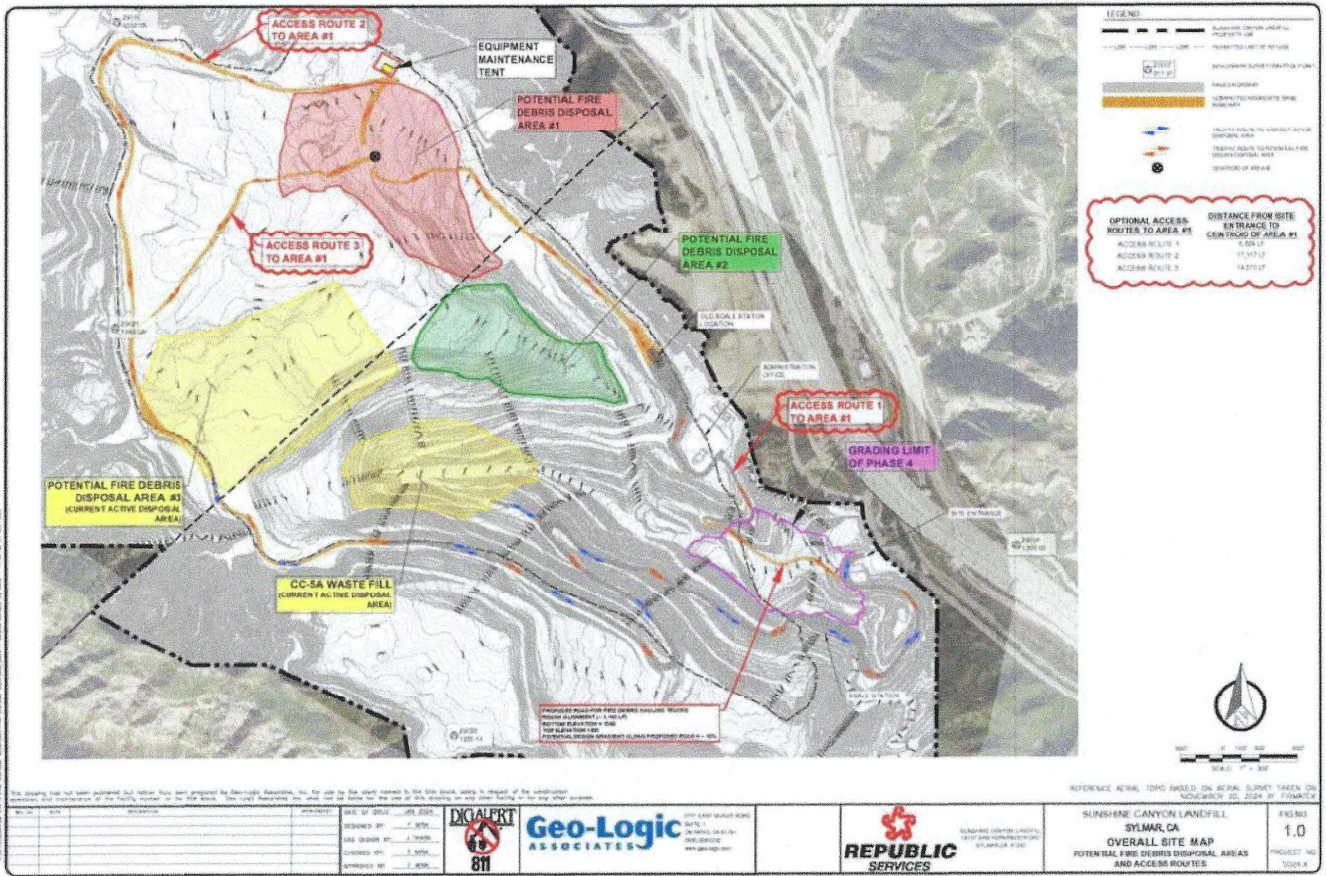
**Exhibit B:** Fire Related Debris Phase 2 From Eaton & Pacific Palisades Fires

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## STIPULATED ORDER OF ABATEMENT AS PRESENTED

- To approve, the Stipulated Order before you, and by ignoring the testimony and issues the community has raised is unconscionable as we have suffered great harm, as the largest landfill in the County of Los Angeles. If you approve the Stipulated Order without **additional requirements to include such conditions as a late opening at 9 a.m., , a ban on stacking of long-haul trucks before 9 a.m. , and a reduction in tonnage to 5,500 or 6,600 tons/day, and a automated gas collection system (see below)** it will place an undue burden on the communities of Granada Hills and Sylmar (a minority community); a burden not placed on others in the County of Los Angeles. There are measurable environmental and public health results in Granada Hills and Sylmar communities that are already disproportionately burdened by environmental harms and risks. To that end, even the EPA strives to ensure that **no population should bear a disproportionate burden from the negative environmental consequences resulting from industrial, governmental and commercial operations or policies**. Further, County Public Health has consistently refused to address requests for health studies.
- Sunshine Canyon Landfill has a typical gas collection system that even at its best will only collect 85% of the gas generated. Infrequent measurement and tuning due to the manual time and effort required plus the fact that well adjustments are an art rather than a science. Given that the landfill gas odors are carried by the methane the Board should consider mandating that an automated well field control system be installed that would monitor gas composition (%CH<sub>4</sub>, CO<sub>2</sub> & O<sub>2</sub>), Temperature, Flow Rate, Well Static Pressure and System Vacuum, and that can be remote automatic adjustments to individual extraction points. Republic regularly reports small subsurface fires, and this type of system not only would increase the collection of methane but detect and prevent potential underground fires.





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DATE OF SHEET	08/20/2024
DESIGNED BY	J. SUTY
DWG NUMBER	2024-0008
CHECKED BY	J. SUTY
APPROVED BY	J. SUTY

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**SUNSHINE CANYON LANDFILL  
SYLMAR, CA  
OVERALL SITE MAP  
POTENTIAL FIRE DEBRIS DISPOSAL AREAS  
AND ACCESS ROUTES**

EXSNO: 1.0  
PROJECT NO: 2024-0008

## PREVAILING WINDS

- We are located in a wind tunnel called the Newhall-Saugus Pass where the winds from Santa Clarita Valley and the upper desert to the north of us consistently transport odors and dust from the landfill to the surrounding communities. The potential for any contaminated dust or ash deposited at SCL is greater than at any other landfill. AQMD records of the odors and their impacts over the years show that the movement of air occurs daily mainly in the morning from 6 a.m. to 9 a.m. and in the evenings from 6 p.m. to 9 p.m., and seasonally are the greatest from August through April. Transport of odors also occurs during light winds of 3 to 4 miles per hour. SCAQMD's own expert, Dr. Sang-Mi Lee in her report "Meteorological Factors Triggering Odor Episodes, dated November 2, 2016," concluded that: "*Considering diurnal variations of wind speed, direction and vertical mixing, a delay of at least 2 – 3 hours after sunrise would help to mitigate the transport of the odor-laden plume from the landfill to the community*" (attached). Also, the AQMD's historical records (attached) posted on their website at [www.aqmd.gov](http://www.aqmd.gov) support this. Additional studies to support the conditions around the landfill can be found in Newhall Winds of the San Fernando Valley, Ward Koutnik, CSUN Master Thesis <https://scholarworks.calstate.edu/concern/theses/bg257j25k?locale=en> , Santa Ana Windflow in the Newhall Pass As Determined by the Analysis of Tree Deformation, Donald D. Kasper, CSUN Department of Geography <https://www.jstor.org/stable/26180296> ).

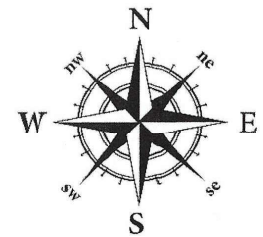
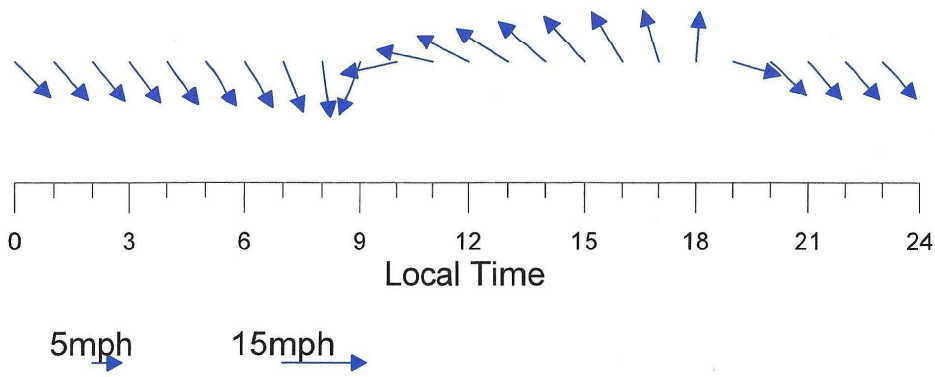
**SCAQMD DR. SANG-MI LEE'S REPORT**  
**METEOROLOGICAL FACTORS TRIGGERING ODOR EPISODES**  
**NOVEMBER 2, 2016**

- Dr. Lee's report concluded that: "***Considering diurnal variations of wind speed, direction and vertical mixing, a delay of at least 2 – 3 hours after sunrise would help to mitigate the transport of the odor-laden plume from the landfill to the community***" and it was accepted by the Hearing Board at the last Odor Abatement Hearing in 2016. The landfill's opening hours were changed from 6 a.m. to 9 a.m., and stacking of long-haul trucks was delayed as well. Although the landfill had objected, they were able to make their operations more efficient and maintained their input of municipal solid waste (msw). The City said that they couldn't do a late opening, however, it turned out only 12 curbside pickup trash trucks and drivers were impacted, and the City complied. The surrounding communities believe that this one condition alone helped to greatly reduce the odor impacts. When the landfill restarted early opening at 6 a.m. after the Odor Abatement expired the odor complaints again shot up.

# Schematics of the Landfill and Community



# Meteorological Factors to Consider: Wind Direction



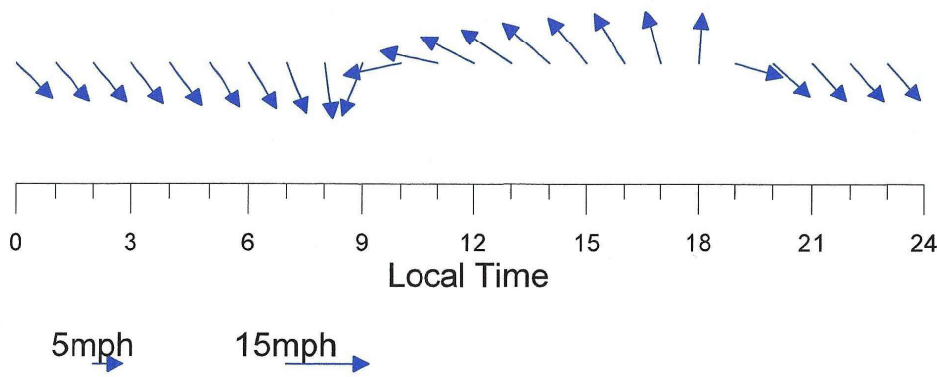
↓ Northerly Wind  
From North to South

↑ Southerly Wind  
From South to North

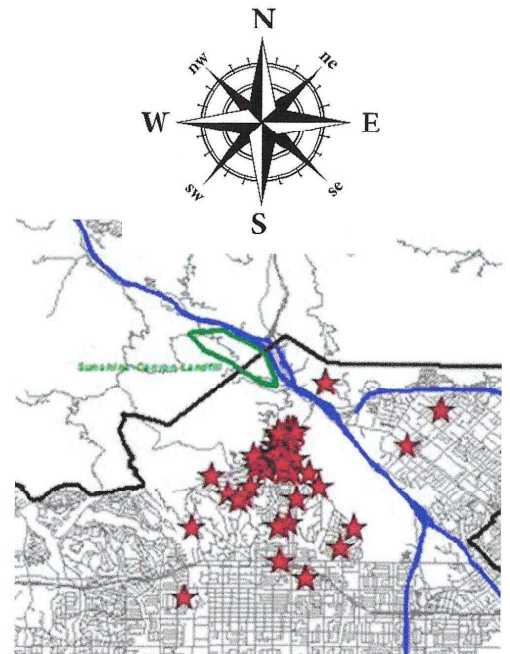
- Wind data were taken at "Repeater" site
- Averaged for the period of 2012-2015



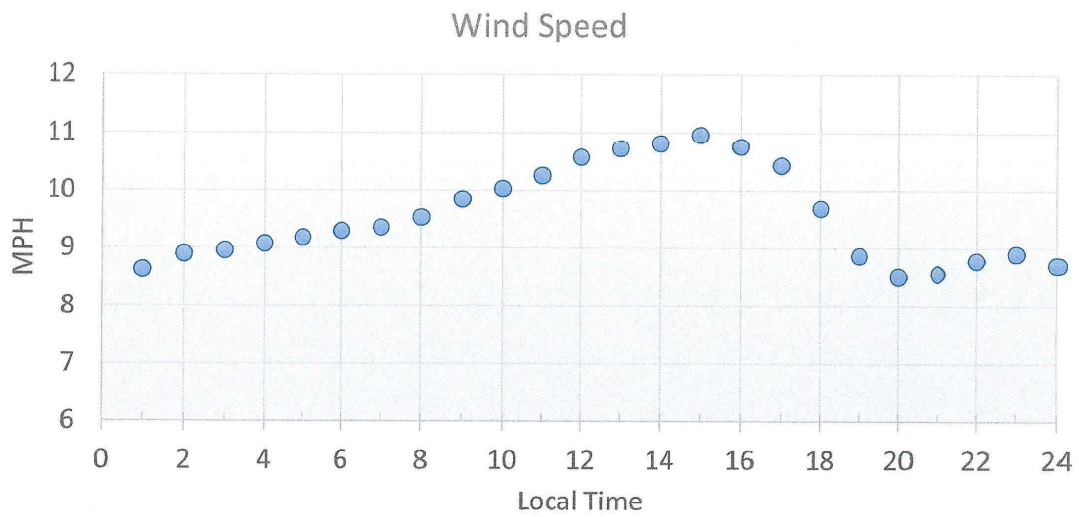
# Meteorological Factors to Consider: **Wind Direction**



Wind data were taken at Repeater site  
Averaged for the period of 2012-2015

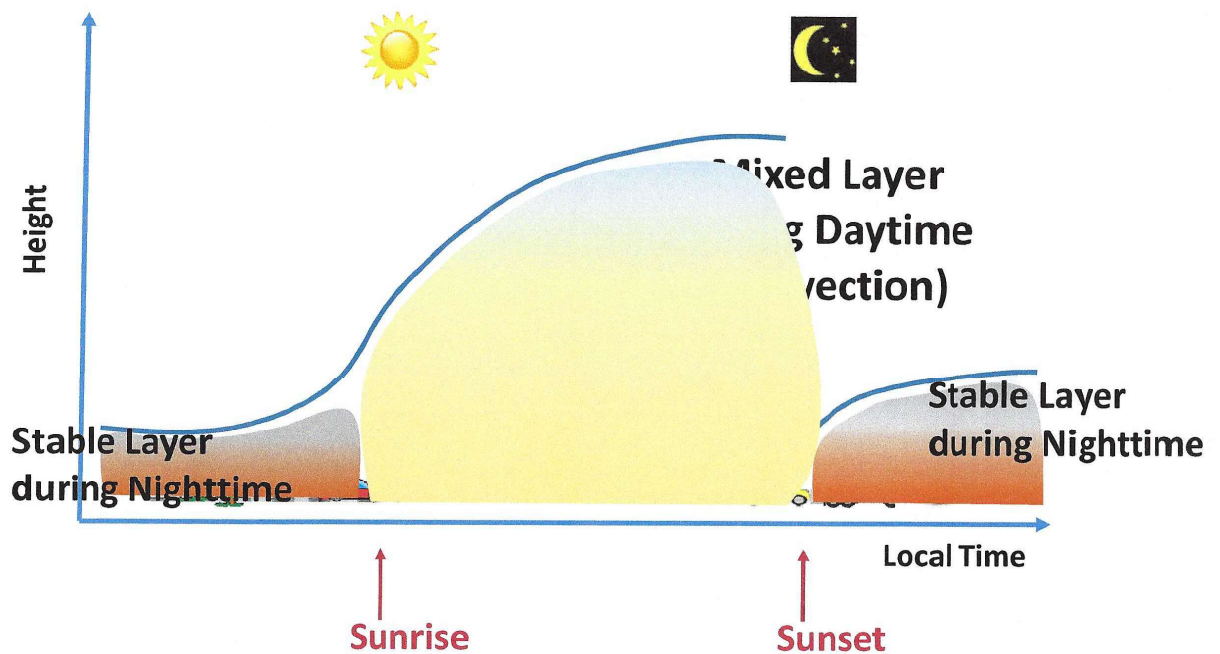


# Meteorological Factors to Consider: Wind Speed

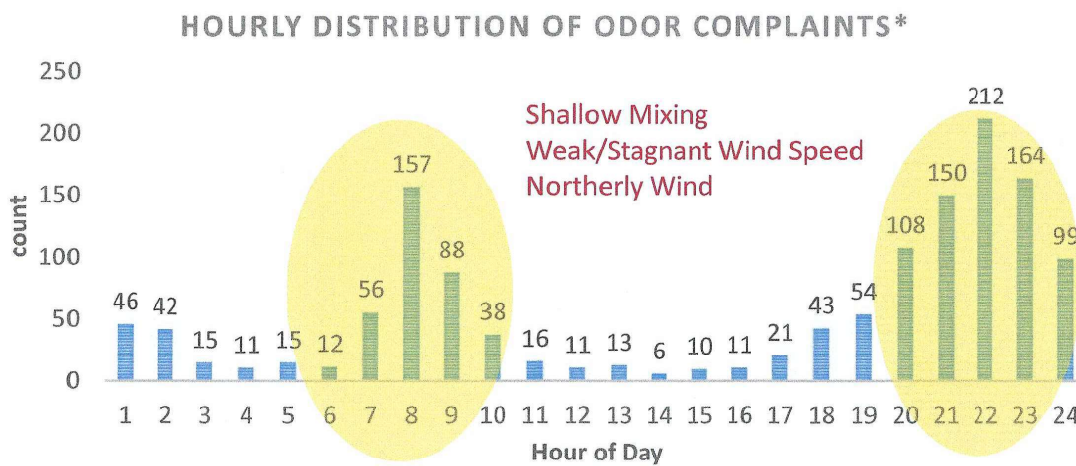


- Wind Speed averaged over the period of 2012-2015
- Measurements were taken at the "Repeater" site

# Meteorological Factors to Consider: Vertical Mixing

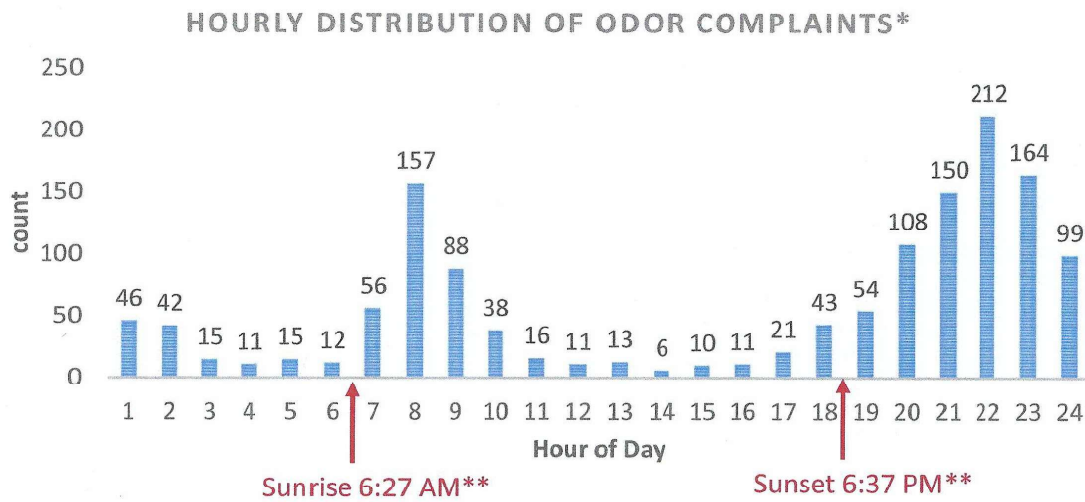


# Hourly Distribution of Odor Complaints



\*All the complaints received during the period of 2012-2015 are included in the plot

# Hourly Distribution of Odor Complaints



\*All the complaints received during the period of 2012-2015 are included in the plot

\*\* Sunrise and Sunset hours are 2015 average time for Los Angeles.

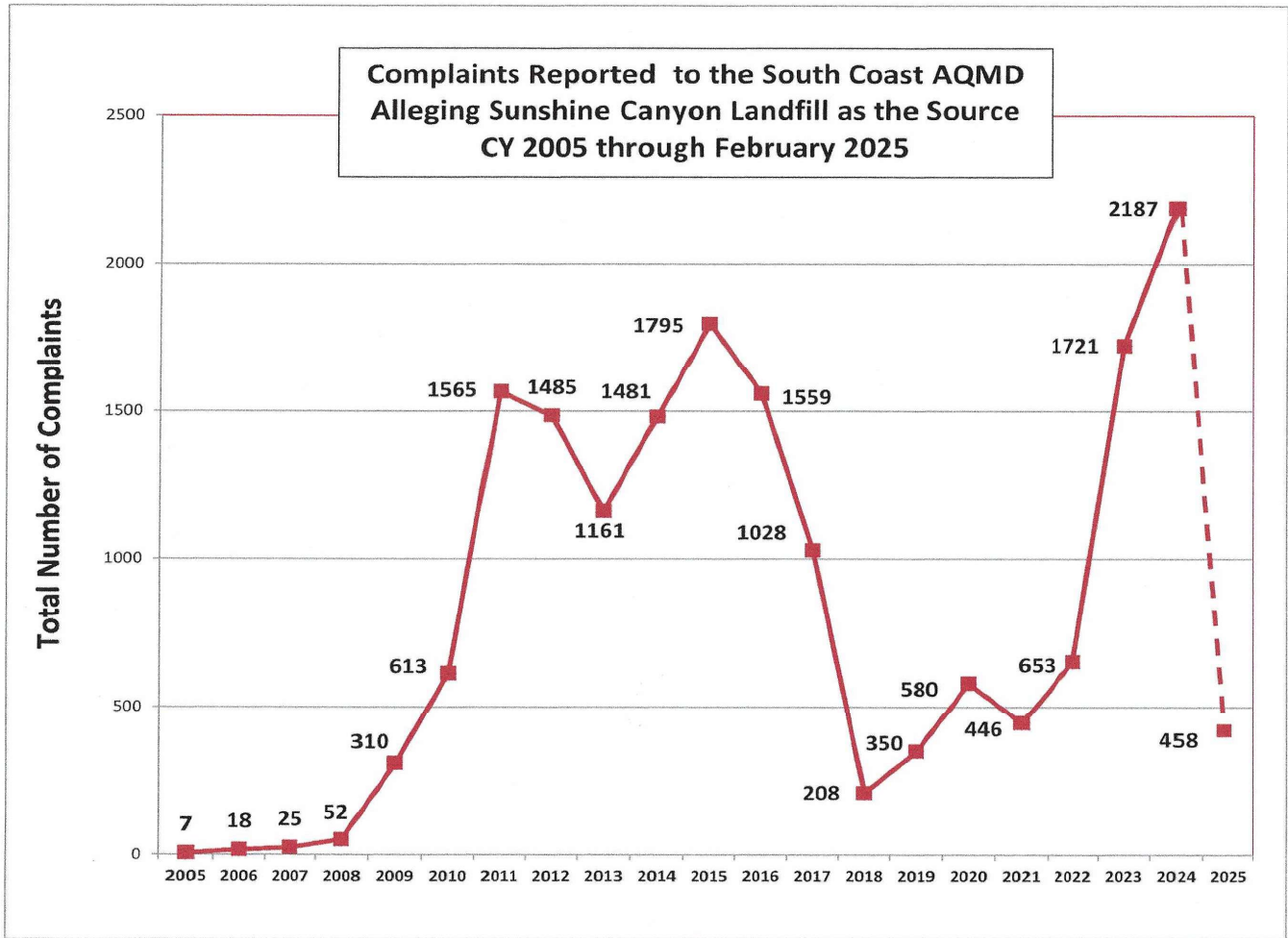
\*\* Source of data: U.S. Naval Observatory

## Summary and Recommendation

- Considering diurnal variations of wind speed, direction and vertical mixing, a delay of at least 2-3 hours after sunrise would help to mitigate the transport of the odor-laden plum from the landfill to the community.

**AQMD HISTORICAL RECORD THRU FEBRUARY 2025 AS POSTED ON THEIR WEBSITE AT**  
[www.aqmd.gov](http://www.aqmd.gov)

- At the SCL-CAC meeting on March 13, 2025, Mr. Larry Israel, Supervising Inspector SCAQMD, reported that " the total number of complaints from January 1st to today are 600 with 18 nuisance violations, and we already gave you the total for 2024 (of 2187 complaints) and comparing that with 2023, we had 1721 complaints with 61 violations for the entire year. So, in total, we've issued 144 nuisance violations since 2023."
- Results of February 2025 SCAQMD Rule 1150.1 Surface Emission Monitoring City County  
For February 2025 surface emission monitoring, 420 integrated grids were monitored. Of the 420 grids monitored 115 did not pass the initial monitoring. For the 115 integrated grids that did not pass the initial monitoring, 42 passed the first 10-day recheck, 73 did not pass the first 10-day recheck but have since passed the second 10-day recheck. Instantaneous monitoring was not required per the Alternative 1150.1 Compliance Plan.  
# Grids Monitored # of Grids with Exceedances # Grids Monitored # of Grids with Exceedances Instantaneous SEM 0 0 0 0 Integrated SEM 233 61 177 54





SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT  
 Sunshine Canyon Landfill, Facility ID No. 49111  
 Odor Complaints Reported to South Coast AQMD Alleging SCL; and Notices of Violation (NOV) Summary from 2009 through February 2025

Public Nuisance: South Coast AQMD Rule 402; Calif. H&S 41700

													Total NOVs	Total Complaints	
	Jan	Feb	March	April	May	June	July	August	Sept	Oct	Nov	Dec			
2016	Complaints	100	188	185	181	30	74	52	85	206	193	206	59		1559
	NOVs	2	4	6	5	0	1	1	1	2	4	4	1	31	
2017	Complaints	200	254	274	116	19	10	14	30	44	27	22	18		1028
	NOVs	6	7	6	1	0	0	0	0	0	0	0	0	20	
2018	Complaints	32	18	21	9	5	9	16	6	33	21	2	36		208
	NOVs	0	0	0	0	0	0	0	0	0	0	0	1	1	
2019	Complaints	17	17	76	12	2	5	7	7	95	82	14	16		350
	NOVs	0	1	1	0	0	0	0	0	1	2	0	0	5	
2020	Complaints	29	17	12	33	98	20	23	82	105	121	18	22		580
	NOVs	0	0	0	0	2	1	0	1	3	4	0	1	12	
2021	Complaints	7	10	3	22	4	31	27	71	55	74	59	83		446
	NOVs	0	0	0	1	0	0	0	2	1	2	0	0	6	
2022	Complaints	158	84	58	38	17	40	12	40	85	64	25	32		653
	NOVs	5	1	0	1	0	2	0	0	2	1	0	0	12	
2023	Complaints	226	191	146	185	32	22	34	264	148	230	130	113		1721
	NOVs	6	7	5	11	1	0	1	9	4	6	7	4	61	
2024	Complaints	204	474	272	266	18	31	47	65	179	405	141	85		2187
	NOVs	9	17	9	6	0	0	0	0	5	11	6	2	65	
2025	Complaints	118	340												458
	NOVs	3	12											15	

Total R402 NOVs Issued to Date

Total Complaints \*

Total R402 NOVs Issued\*\*

	17,604
	391

\* Includes 8,414 Complaints from 2009 through 2015

\*\* Includes 163 NOV's from 2009 through 2015

\*\*\* Includes eight NOV's from 2011 through 2015

March 7, 2025

<b>2016</b>	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Rule</b>														
<b>2017</b>	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Rule</b>														
<b>2018</b>	1	0	0	0	0	0	0	0	0	0	0	0	0	1
<b>Rule</b>	3002, 431.1													
<b>2019</b>	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Rule</b>														
<b>2020</b>	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Rule</b>														
<b>2021</b>	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Rule</b>														
<b>2022</b>	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Rule</b>														
<b>2023</b>	1	0	0	0	1	0	1	2	1	0	0	0	0	6
<b>Rule</b>	403				402		403		403		403			
<b>2024</b>	0	1		0	1	0	0	0	0	0	0	0	0	2
<b>Rule</b>	1150.1				403									
<b>2025</b>	0	0											0	0
<b>Rule</b>														

Total Other NOV's Issued\*\*\* 

17
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\* Includes 8,414 Complaints from 2009 through 2015

\*\* Includes 163 NOV's from 2009 through 2015

\*\*\* Includes eight NOV's from 2011 through 2015

March 7, 2025

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**Exhibit A: Automated Well Field Control System**

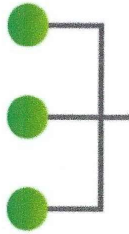
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# Automated well field control system



## **MONITOR**

real-time, wireless measurement  
of landfill gas production



## **CONTROL**

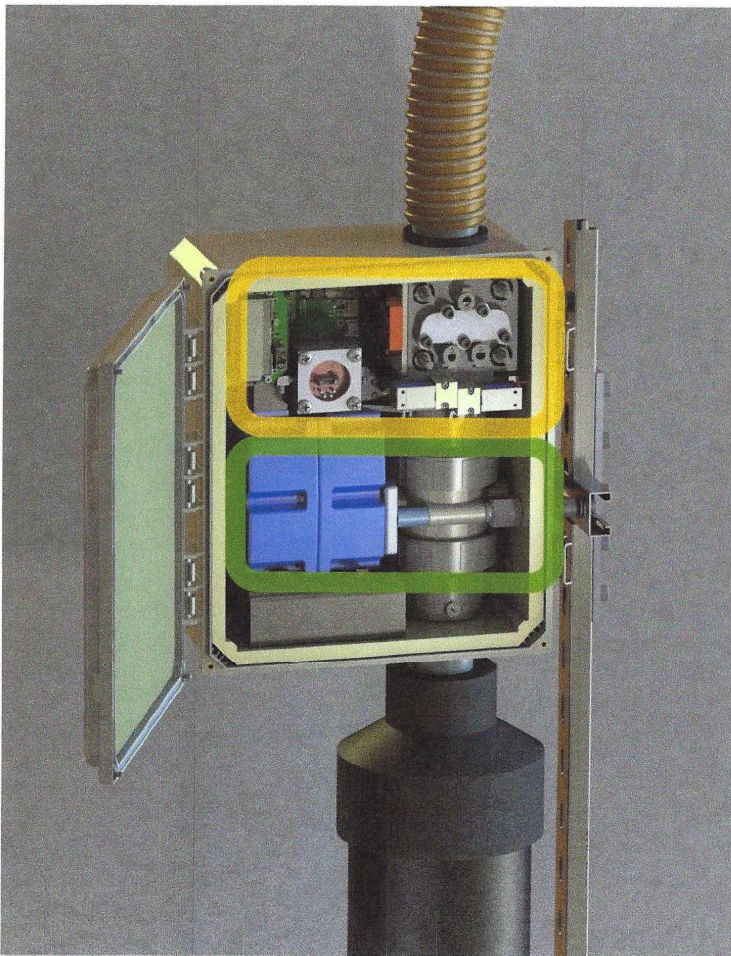
remote, automatic adjustments  
to individual extraction points



## **OPTIMIZE**

maximize system performance  
with custom tuning algorithms

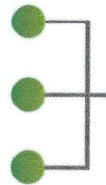
# Integrated measurement and control



## MONITOR

real-time, wireless measurement of landfill gas production

- Gas Composition: % CH<sub>4</sub>, CO<sub>2</sub> & O<sub>2</sub>
- Temperature
- Flow rate
- Well Static Pressure
- System Vacuum



## CONTROL

remote, automatic adjustments to individual extraction points

- Remotely actuated valve
- Continuous resolution, 0-100% range
- Variable control interval, step size

# Installed device

Manual valve (bypassed)

2" Flexible hose with pipe clamps

Gas extraction well

Standard flexible reducing coupling

Device mounts to vacuum riser



**Exhibit B: Fire Related Debris Phase 2 From Eaton & Pacific Palisades Fires**

## FIRE RELATED DEBRIS PHASE 2 FROM EATON AND PACIFIC PALISADES FIRES

- The landfill operators of this Class III landfill plan to take approximately 384,000 tons of this potentially hazardous material by having it dumped high up on an exposed south facing slope over 120 days. Remember this is fire-related potentially hazardous debris that they will have to keep wet with their 2 water trucks when it is exposed to the open air after moving, grading and compacting in order to prevent it from drying out and becoming airborne until it is finally covered at the end of each day. Also, the US Army Corp of Engineers will be using 10-ton trucks resulting in an additional 69,600 trip ends based on 2,900 tons per day which will further degrade our air quality and impact our local traffic further risking the health, safety and welfare of the communities of Granada Hills and Sylmar (a minority community).
- Suzanne Paulson, a professor at the University of California, Los Angeles, and an expert on air pollution, said that *the smoke plume from the fires included “astonishingly high” levels of heavy metals and other toxic ingredients — all of which were present in the ash that covered the burn sites. Those particles also stick to debris and become more dangerous as people begin to sift through materials and move things around. “When that material is disturbed, there is potential for it to become airborne,”* Dr. Paulson said. (excerpt New York Times, Published Feb. 3, 2025, Updated Feb. 4, 2025)



Sunshine Canyon Landfill  
SWIS No. 19-AA-2000  
Fire Debris Unloading  
February 25, 2025





# SCL Fire Debris Disposal

Removing Tarp



Water Spray While Unloading



Water Spray While Spreading



Clean Truck Leaving Disposal Area



Compacting Wet Debris



Daily Cover Soil Stockpile

