

SUNSHINE CANYON LANDFILL



A REPUBLIC SERVICES COMPANY

May 28, 2010

Mr. Edward Camarena
Chair, SCAQMD Hearing Board
21865 Copley Drive
Diamond Bar, CA 91764-4178

Re: Order of Abatement Status Report for Sunshine Canyon Landfill, Case No. 3448-13

Dear Mr. Camarena:

This report has been prepared pursuant to condition 13 of the Order for Abatement (Order), which requests a quarterly status report, commencing June 1, 2010, addressing certain abatement measures, numbers of complaints, and the status of studies, and requests that this report be posted on Sunshine Canyon Landfill's (SCL) website.

#13(a) - Implementation of Effectiveness of Odor Abatement Measures

Condition #1 Restriction of Working Face and Reduction of Incoming Trash on Monday Mornings and During Adverse Wind Conditions

Status: Transfer truck trash is restricted from entering SCL on all Monday mornings and mornings when adverse wind conditions are present. SCL has contracted with the operator of the weather station on the Southern Berm of SCL to provide automatic wind speed and direction updates every 30 minutes via email to validate adverse wind conditions specified in the Order.

The working face size is restricted to 30,000 sq ft or less on Monday mornings and mornings when adverse wind conditions are present. The size of the working face is measured on an hourly basis, recorded and signed off by site supervisor to verify compliance. Trash is treated with an odor neutralizer at each transfer station pre-load prior to depositing at SCL.

Effectiveness: SCL believes these measures may be effective at reducing the potential for odors and migration of the odors to the neighborhood. This is supported by both the reduction in complaints received and the odor patrols of the community. Effectiveness

should be verified by Order #7e Working Face Study that will be conducted once the proposal is approved by the District.

Condition #2 Working Face Controls

Status: Working face perimeter misting systems are installed and used as prescribed in the Order. The DustBoss misting system is installed and used as prescribed in the Order. There have been no breakdowns of these systems since installation.

Effectiveness: SCL believes that these measures do little to abate odors or prevent odors from migrating to the community. If further supported by the data gathered for the required studies, SCL will request approval from the Hearing Board to eliminate this requirement.

Condition #3 Landfill Perimeter Misting System

Status: The Perimeter Misting System was installed and is operated as prescribed in the Order of Abatement.

Effectiveness: SCL believes that this measure does little to abate odors or prevent odors from migrating to the community. In fact, complaints have been received from the community citing a "Febreeze-like" odor from direction of SCL. If further supported by the data gathered for the required studies, SCL will request approval from the SCAQMD Hearing Board to eliminate this requirement.

Condition #4 Tarping Misting System

Status: The Tarping Misting System was installed and is operated as prescribed in the Order. A spray system is mounted on the Tarp-o-Matic that applies neutralizer directly on the trash as tarps are deployed.

Effectiveness: SCL believes this measure may be effective at reducing the potential for odors and migration of the odors to the neighborhood. This is supported by the reduction in complaints received and the findings during odor patrols. The combination of tarps and misting and other potential working face treatments will be studied in the Working Face Study (Condition #7e) which will be conducted once the proposal is approved by the District.

Condition #5 Haul Roads

Status: The main haul roads are treated with an odor neutralizer via water truck every two hours. Collection and transfer trucks are not allowed to queue on the main haul road prior to opening the landfill.

Effectiveness: SCL believes one or both of these measures may be effective at reducing the potential for odors and migration of the odors to the neighborhood. This is

supported by the reduction in complaints and the community odor patrols but will be further considered as part of other studies being done for the Order.

Condition #6 Wind Monitoring

Status: The facility subscribes to a service for predictive wind and weather forecasting. In addition, SCL has contracted with the operator of the weather station on the Southern Berm of SCL to provide automatic wind speed and direction updates every 30 minutes via email to predict adverse wind conditions as specified in the order. Data is sent directly to SCL field supervisors for response to adverse wind conditions. This information provides them information to meet various mitigation requirements in the Order.

Effectiveness: Data collection and communication is providing wind speed and direction information reliably.

Condition #10 Odor Survey

Status: Odor surveys or patrols are conducted by SCL employees trained in odor detection and characterization. The patrols are conducted daily (Monday through Friday) from 7 am to 9 am. The result of each survey is recorded along with the wind speed and direction for that survey period. A survey is conducted by facility employees when a complaint is received. In the event the odor survey detects odors the SCL Environmental Manager and Operations Manager are notified and initiate a root cause and immediate corrective action to mitigate the source of odor.

Effectiveness: SCL believes this is an effective tool for early detection of odors.

#13(b) Numbers of Complaints

Complaints Received by SCL

March 2010: 10

April 2010: 11

May 2010 (thru the 27th): 3

In all of the above cases no specific cause of the odors could be identified and no immediate abatement actions were taken. In two instances in March, the wind was blowing from the complainants towards the landfill, so it is likely there were other causes of odors on those days. However, as discussed below, during the same time period it was determined that landfill gas was a primary cause of nuisance odors. Mitigations are as listed below.

Notice of Violation Summary

During the period of March 24, 2010 through May 26th 2010, SCL received one Notice of Violation on 4-16-10 for nuisance odor Rule 402. The root cause was determined to be landfill gas.

Gas detection sweeps have been increased to identify hot spots. The well field was tuned and/or repaired to eliminate the source of the order. SCL is undertaking significant investment to upgrade the landfill gas well field and is drilling up to 50 new gas wells in the next 60 – 90 days.

#13(c) Status of Studies

Status of Studies in Progress

There are no studies in progress at this time.

Proposals for the following were submitted for review and approval of SCAQMD::

Condition	Study	Proposal Submittal Date
7a	Meteorological Study	May 25, 2010
7c	Neutralizer at Transfer Station Study	May 25,2010
7e	Working Face Study	April 26, 2010

The Vegetation Plan (Condition #9) has been prepared in a draft form by ESA Inc. and will be submitted by June 1, 2010. The consultations with applicable government agencies and their arborists has not yet been able to occur, so the draft being submitted will be subject to change based on their input. A final Vegetation Plan as soon as review by agency personnel is completed and their comments can be incorporated. This is expected no later than July 15, 2010 and time extension is requested to allow this to happen.

Environ Strategies, Inc has been contracted to submit a proposal for a feasibility study to examine the collection and destruction of odors at the facility. This proposal is due June 10, 2010 at noon.

Summary of Completed Studies

Condition #7b Delivery Alternatives Study

A completed study was provided to the District regarding alternatives to depositing trash on the existing working face on Mondays and when adverse wind conditions on May 26, 2010. SCL documented the inflow of waste into SCL before and after the approval of the Order. Data was provided on each transfer station inbound and outbound volumes as well as the destination of each outbound transfer truck. In addition, comprehensive legal review of the existing contracts was conduct to determine the feasibility of further

restricting inbound trash volumes to SCL on Monday mornings and when adverse wind conditions are present.

SCL has successfully diverted the largest portion of the municipal solid waste (MSW) delivered to the landfill during the 6 a.m. to 9 a.m. time frame by using alternate disposal sites and delaying the delivery of transfer trucks from facilities owned by Republic Services. Beyond that, SCL has determined that it is not legally feasible to further restrict the flow of wastes to the landfill facility on Monday mornings beyond the restrictions already placed on transfer stations delivering wastes to the SCL.

Republic Services is undertaking several studies regarding various aspects of SCL's operations, the local meteorology, and technologies that might be used to reduce or eliminate odors. To the extent that any technologies emerge that prove effective, or to the extent that a better understanding of local meteorological conditions can assist SCL in odor reduction, SCL may make future recommendations to minimize or lift the current restrictions imposed on Mondays and during Adverse Wind Conditions.

Condition #7d Neutralizer Study

This completed study was submitted to SCAQMD on May 25, 2010. The study was conducted by Environ and addressed both literature reviews and field experience with neutralizers for odor control. The recommendation of this study was that testing of neutralizer and foam effectiveness be rolled into the Working Face Study, at which time quantitative results on odor reduction will be determined and documented..

Condition #8 Consultation for Odor Control

A report documenting the finding of the Consultation for Odor Control was submitted to SCAQMD on April 26, 2010. A supplement containing additional information was submitted on May 25, 2010. The consultation was done by Compliance Plus. The findings varied somewhat. Landfills were using a mix of techniques including immediate burial of odorous loads, different working face covers, and there was use of neutralizers though that was at the minority of the sites interviewed. Odor patrols were also not universal.

A total of six landfills were interviewed regarding the issues stipulated in the Order. The report recommendations included evaluating odor neutralizers in the Working Face Study, strengthening odorous load management policies, evaluation thin-film covers for the working face in the Working Face study, continuing odor patrols, and increasing attention paid to gas well headers both in wet and dry weather.

Recommended and Approved Measures to Abate Odors

Other than those listed above, there are no other pending recommended measures to abate odors. No new measures have been recommended or approved by SCAQMD at this time.

Schedule for Implementation of Approved Measures

There are no approved measures at this time.

Please contact Susan Jennings, Environmental Manager, at Siennings4@republicservices.com or (818) 833-6514, or myself at KBratton@republicservices.com or (818) 833-6511 if you have any questions regarding this report.

Sincerely,

Becky Van Sickle

Kurt Bratton
General Manager

- For Kurt Bratton