

**SUNSHINE CANYON LANDFILL JTD
RESPONSE TO AGENCY COMMENTS**

Agency	Comments	Response	Section Amended	Status
City of Los Angeles LEA	<p>1) Previous comment # 4, overlap drawing not provided "E 1-16, Phased Closure Sequencing, last paragraph and continuing onto page E 1-17. Additional detail and description is needed on how this final cover interface will meet the protective requirements. Text indicates that "additional vegetative layer" will be placed to overlap the edge of the final cover by 10 feet (some other areas, by 20 feet). The LEA is concerned that the overlap areas where the proposed new final cover merges with the existing monolithic final cover may be inadequately protective. Detail drawing is required to show the additional vegetative soil overlap placement for situations where the 10 foot overlap is utilized, and a separate detail drawing for the situations where the overlap is 20 feet (traffic areas)."</p>	<p>This part of the text is referring to final closure caps adjacent to active areas with intermediate cover. The vegetative layer simply overlaps the existing intermediate cover as indicated in the text. For example the area adjacent to closure Phase B is closure phase E. The overlap referred to will occur over future closure phase E from 10 to 20 feet as indicated until it is actually closed. It is not referring to overlap of closure caps over previously closed monolithic covers. That is already depicted in Figure 24A, detail 2 in the JTD.</p>	No section amended.	Completed
City of Los Angeles LEA	<p>2) Volume 1, C.3-7, Text description of bottom area liner system and drawing are not consistent with each other. Either the drawing and/or the description is/are incorrect</p>	<p>The text in Section C.3 has been corrected as well as Figure 23.</p>	Figure 23 and Section C.3	Completed
City of Los Angeles LEA	<p>3) Previous City LEA Comment Number 37, JTD was not addressed, "Appendix N, Excavation Slope Stability Analysis and Final Refuse Fill Slopes, Figure 7-6, and Figure 7-7, and Figure 7-8, Section C-C' and Section D-D': The Section C-C' and Section D-D' slope stability analysis cross section have a stabilizing toe berm which abuts next to "existing topography". The "existing topography" is in the area of the previous closed/inactive City Landfill. Figure 7-7 and Figure 7-8 should show the MSW portion in the cross section depiction. Please differentiate the portions that are soil, and the portions that are MSW. Please also confirm that in the assessment of the MSW at the toe of the proposed landfill expansion."</p>	<p>Section C-C' does not cross through the old City Unit 1 Landfill waste prism. Section D-D' does cross through the waste. GLA created a technical memo that addresses this issue. Text has been revised to reference new information as Appendix N.</p>	Section C.3.2.2, D.4.5 and Appendix N	Completed
	<p>The newest submission (November 2007, Appendix S) does not have the same slope stability analysis as the previous submission. The current submission's analysis is not applicable to Figure 1a and Figure 1b included in Appendix S (Slope Stability Analysis SCL City) for which the slope stability analysis performed. The stability analysis was not done on the proposed final contours, and this whole section is inadequate for our analysis and incorrect as written. The current Appendix S is not applicable to the expansion.</p>	<p>The text in Section C.3.2.2 has been revised to indicate that Appendices R and S have been provided for informational purposes for the existing City and County landfills and that Appendix N provides the stability analysis for the consolidated SCL which does analyze the proposed final contours.</p>	Section C.3.2.2	Completed

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<p>City of Los Angeles LEA and CRWQCB</p>	<p>Requested Corrections/Revisions to the Slope Stability Analysis (3/27/08). Follow up to Comment #3 above.</p> <p>Correct cross-sections and redo stability analysis as needed to account for the fact that a portion of the proposed expansion is on an existing closed City landfill, and that the base liner angle will be steeper due to additional settlement of the existing landfill ("bowling effect"). Prepare an analysis to show the "sensitivity" of safety factor of this potential increased slope angle for the base liner that is placed over an existing landfill.</p> <p>The toe of the landfill also intersects part of the closed City landfill. Review if the potential settlement of the closed landfill may potentially impact the functionality of the toe berm.</p> <p>Revise/recalculate the critical shear strength parameters for the proposed liner system using a reinforced GCL.</p> <p>On Section D-D', the parameters/calculations indicate the use of cementitious materials being used for the toe berm. Since this is not what is ideal (e.g., cracking, etc.) and not what is actually being proposed, revise the drawings (and cross sections) to reflect what is actually being proposed, e.g., soil, MSW, etc.) The slope stability analysis should be redone to reflect the changes.</p> <p>Include the figures/drawings to reflect the actual proposed final cover design on each of the cross sections used for the slope stability analysis. (The current cross section drawings of the cover (in the appendix) are not what is being proposed).</p> <p>Provide reference drawing that shows the small ridge area in the area of the toe berm of cross section D-D'.</p>	<p>The stability analysis was reviewed and revised as appropriate by GeoLogic Associates based on discussions at the meetings on March 25 and May 7, 2008 with the agencies regarding these issues. Appendix N was revised accordingly upon completion of the stability review revision.</p>	<p>Section C.3.2.2, D.4.5 and Appendix N</p>	<p>Completed</p>

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City of Los Angeles LEA	<p>4) Volume 1, Section B2.2.7.</p> <p>The JTD states that up to 6,600 tons per week of exempt materials are received. "Processed" green waste may be received. The LEA requests a description of "processed" green waste. Note the previous LEA comment number 21:</p> <p>Please specify the source / origin of the green waste to be received and processed. Please note that recent green waste contamination studies indicate that the level of contamination in green waste collected from City of Los Angeles source separated residential green waste programs ("green bin") does not meet the CIWMB requirement for a maximum of one percent (1%) contamination in "clean green" green waste. As such, the "green waste operation" is treated as a transfer, e.g., load check procedures, odor management plan, etc.</p> <p>The green waste that is received must be under 1% contamination if it is to be an "exempted" material. If the green waste is screened or otherwise "processed" at another location to reduce the level of contamination, please state so. As noted in the previous comment, green waste from source separated residential programs will most likely not meet the contamination level requirements. CIWMB policy requires these incoming green waste loads to be checked on a load basis.</p>	<p>The text in Section B.2.2.7 has been revised to describe "processed green waste". Appendix E has been revised to indicate that the green waste received is under 1% contamination.</p>	Section B.2.2.7	Completed
City of Los Angeles LEA	<p>Change JTD to reflect cleaning out sedimentation basin as soon as practicable.</p>	<p>Section B.7.1.5 has been revised to indicate that the basin is cleaned of any debris as rapidly as possible to maintain capacity.</p>	Section B.7.1.5	Completed
City of Los Angeles LEA	<p>Final Cover needs to be reviewed and approved over old SCL Unit 1 prior to expansion into that area.</p>	<p>Field permeability tests and another year of infiltration data were sent to the RWQCB in the Final Cover Report. Conditional approval was received from the RWQCB on April 18, 2008. The LEA concurred in the conditional approval in a letter dated April 23, 2008.</p>	No section amended.	Completed
CIWMB	<p>Comment to Response 1-</p> <p>The submittal only included one page on which meetings beyond 12/8/1999 were not identifies. It's possible that the submittal accidentally left out additional pages with the more recent meetings.</p>	<p>The incorrect list was sent with the application. The correct list was obtained and will be provided.</p>	SWFP Application Attachment 7	Completed

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CIWMB	<p>Comment Response 6- When reviewing the revised information on the application it was observed that for the site capacity currently permitted the addition of the 13,441,300 cy for the city and the county provide a total of 50,756,652 cy and that the site capacity used to date (25.6 mcy) when added to the site capacity remaining (25.2 mcy) equals this total amount however the capacity used to date and capacity remaining combine the city and the county capacities and don't identify the specs amount for each. These figures are as of October 31, 2007. In the Notes on the page titled "Landfill Capacity Survey Results" it identifies the "remaining capacity" for the currently permitted city landfill as 10.07 mcy and for the county it provides a figure of 17.2 mcy (both of these are as of October 19, 2006). If both of the remaining volumes as of the 2006 date are added it totals 27.9 mcy for a difference of 2.7 mcy between the 2006 and 2007 figures.</p> <p>Some of this capacity was consumed at the city landfill and some at the county landfill but the information isn't in the JTD. At the bottom of the Landfill Capacity Survey Results page it states "See Appendix C for Additional Capacity and Site Life Calculations". The calculations in Appendix C combine the currently permitted airspace also and don't identify that capacity which was consumed on the city side individually between the dates of October 19, 2006 and October 31, 2007. Since tonnage figures of materials disposed of at each landfill are available the complete picture can be illustrated. The individual calculations should be available in Appendix C and perhaps entered into notes of the Landfill Capacity Survey Results.</p>	The capacity calculations have been corrected and are to be included in Appendix C of the JTD. The text in Section B.3.3.1 has been revised accordingly.	Section B.3.3.1 and Appendix C	Completed
CIWMB	<p>Comment to Response 11- On Table 23 which is intended to provide a volumetric summary the capacity used to date is not consistent with figures provide on the application. [See above comment to response 6.] In addition to the October 31, 2007 remaining capacity figures being included in the Appendix C, and in the notes on the Landfill Capacity Survey Results there is no reason why they shouldn't also be included in Table 23.</p>	Table 23 has been corrected to reflect the correct information and calculations.	Table 23	Completed

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<p>CIWMB</p>	<p>Comment to Response 12- In section B.3.31 - Site Life it mentions that the remaining gross airspace is 115.6 mcy (as of 10/31/2007). However in this section proceeding this (B.3.2.) it mentions that 22.9 mcy of gross airspace have been consumed (as of 10/19/2006). If the remaining gross airspace is subtracted from the total proposed airspace of 141.2 mcy it provides the same figure as that which is included on the application for site capacity used to date (25.6 mcy) but if remaining gross airspace of 115.6 mcy (as of 10/31/2007) is added to the 22.9 mcy figure (as of 10/19/2006) it doesn't equal the total proposed airspace of 141.2 mcy. Why can't the figures in section B.3.2 be revised to be consistent with the October 31, 2007 calculations? [Also it was observed that in Appendix K that there may be as much as 90 feet of settlement in some fill areas of the landfill. In section B.3.3.1 as well as in Appendix C there is no discussion of additional site life due to settlement.]</p>	<p>Table 23 has been corrected to reflect the correct information and calculations.</p>	<p>Table 23</p>	<p>Completed</p>
<p>CIWMB</p>	<p>In five areas of the site the distance between probes exceeds 1,000 feet as required in §20925(b)(1). These areas are between probes P-203&P204, P-204&P-205, P-208&P-209, P-209&P-210, and P-212&P-213. The maximum 1000 foot spacing was placed in the standards based on the assumption that the off site area in question is remote, uninhabited and with no current environmental impacts. To exceed the maximum 1000 foot spacing the operator per §20923(a)(2) must also demonstrate that there are no potential landfill gas (LFG) migration pathways through the local geology. BAS has not demonstrated this. It should be noted that probes P-201, P-211, P-212, P-230 and P-231 are shown within the approximate limits of refuse. Probe P-202 appears surrounded by refuse on three sides. If these probes are truly in or surrounded by refuse they are not valid monitoring points and this will result in additional areas where the 1,000 foot spacing is exceeded.</p>	<p>Additional probes are proposed on Figure 20 to comply with the 1,000 foot spacing requirement.</p>	<p>Section B.7.2.5 and Figure 20.</p>	<p>Completed</p>

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CIWMB	<p>All but three of the existing probes do not comply with §20925(c)(1) which requires all monitoring wells to equal the maximum depth of waste which is 1400 feet for SCL. In Table 24 BAS requests "depth modifications" for all probes not meeting the 1400 feet depth requirement.</p> <p>The depths of probes P-201 through P-212 do not exceed 40 feet. At this depth they are as much as 510 feet too short and as little as 193 feet too short.</p> <p>Table 24 contains a column indicating the "elevation of deepest waste adjacent to probe". Actual probe depths were also way short of the values in this column even though they were much less than the maximum depth of waste. It is not clear what the purpose of this column is. It is also not clear how far "adjacent" is.</p> <p>Per §20925(c)(2) the operator can request modifications to this requirement, but they must demonstrate that the proposed modified depths are sufficient to detect migrating LFG and they have not done this.</p>	<p>GeoLogic Associates analyzed the lithology and groundwater occurrence at SCL with respect to the depth and location requirements for gas probes in Title 27. Their findings and recommendations have been included in a memo in Appendix W. Applicable JTD text and figures have also been revised to incorporate the findings and recommendations.</p>	<p>Section B.7.2.5, Figure 20 and Appendix W. Table 24 has been deleted.</p>	<p>Completed</p>
CIWMB	<p>The existing monitoring wells were built in 1999 and 2005. Their design and construction could not have taken into account the new LFG standards. As a result, all existing monitoring wells probably do not comply with the requirements of §20925(b)(2) in that they were not spaced to align with gas permeable stratigraphic features like sand or gravel lenses. It also appears that the probes were not constructed to comply with §20925(c)(1)(D) in that the probe screen depths were not adjusted based on geologic data obtained during drilling. It should be noted that the data submitted in Appendix W was not sufficient for determining permeability to LFG of strata around existing probe screens.</p>	<p>GeoLogic Associates analyzed the lithology and groundwater occurrence at SCL with respect to the depth and location requirements for gas probes in Title 27. Their findings and recommendations have been included in a memo in Appendix W. Applicable JTD text and figures have also been revised to incorporate the findings and recommendations.</p>	<p>Section B.7.2.5, Figure 20 and Appendix W. Table 24 has been deleted.</p>	<p>Completed</p>
CRWQCB	<p>1) Geologic Map and Cross Sections -</p> <p>Section 21750(1)(1) of 27 CCR requires a comprehensive geologic map and geologic cross sections showing lithology and structural features to be included in JTDs. The geologic maps provided in the JTD (Figures 44 and 45) are inadequate because the scales are too small and details of many lithologic and structural features are not reliable. Although those maps indicate that cross sections may have been prepared, no geological cross sections are included in the JTD. Those geological maps must be resubmitted in a more readable format and cross sections, especially for areas impacted by landslides, must be included.</p>	<p>Figures 44, 44A, 45, 45A, and 45B have been added to replace Figures 44 and 45 in order to show the geologic map and cross sections for the City and County landfills. Section D.4 has been revised to reflect these figure references.</p>	<p>Section D.4, Figures 44, 44A, 45, 45A and 45B.</p>	<p>Completed</p>

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CRWQCB	<p>2) Stability Analysis - Appendix N of the JTD includes slopes stability analyses that were prepared in 2002 for a previous JTD. However, landfill designs in the new JTD are different from those assumed in the 2002 for previous JTD. Specifically, the new JTD proposes a double composite liner system and a final cover system that includes a low permeability (clay) layer, while the 2002 JTD assumed a single composite liner system and a final cover system that included geosynthetic clay liners instead of a clay layer. We understand that BFI will submit stability analysis design plans for each phase of landfill development. However, stabilities of the overall landfill configuration and final refuse slope must be demonstrated in the JTD. In accordance with section 21750(f)(5) of 27 CCR, stability analysis in the JTD must be updated.</p>	<p>GLA created a technical memo that addresses both RWQCB Comment Nos. 2 and 4. Text has been revised to reference new information as included in the revised Appendix N. In addition, the cover design presented in Section E.1.3.1.2 and Figure 48 has been revised to include a reinforcing geogrid layer below the geocomposite drainage layer. The closure cost estimate has also be revised to include the geogrid cost.</p>	<p>Sections C.3.2.2 and E.1.3.1.2, Figure 48, Table 18 and Appendix N</p>	<p>Completed</p>
CRWQCB	<p>3) Leachate Collection Sump - The leachate collection sump displayed in Figure 16 of the JTD is typical for a landfill equipped with a single composite liner system. Because all phases of the processed City / County Landfill will be constructed with double composite liner systems (as displayed in Figure 23), Figure 16 must be replaced.</p>	<p>Section B.3.7.9 of the JTD text has been clarified to indicate that Figure 24 is for proposed phases and Figure 16 is for existing.</p>	<p>Section B.3.7.9</p>	<p>Completed</p>
CRWQCB	<p>4) Settlement Analysis - Section E.1.4 and Appendix K of the JTD present a settlement analysis for the Landfill after final closure. However, Figure 1 of Appendix K does not show any settlement in the Phase I and II areas of the current County Extension Landfill. We are unclear if this is due to the fact that the is-settlement contour interval is too great (20 feet) so that smaller settlements could not be displayed, or those areas were not included in the analysis. In either case, the JTD should clarify whether settlement will occur in those areas. Because of the relatively flat final grade in the northern portion of the Landfill, any settlement may affect the surface water drainage system in the area.</p>	<p>GLA has prepared a revised Figure 1 to Appendix K - Settlement Analysis to address this issue. Additional revisions including spot settlement on City side outside of the contour lines were completed pursuant to March 27, 2008 comments by the City of Los Angeles LEA.</p>	<p>Figure 1 of Appendix K</p>	<p>Completed</p>
CRWQCB	<p>5) Financial Assurance for Corrective Actions - Appendix O of the JTD includes an estimate of corrective action cost that was submitted to the Regional Board by BFI in May 2007. However, the Regional Board adopted Order No. R4-2007-0046 on December 6, 2007, and established amounts financial assurances for corrective actions that differ from what had been proposed by BFI. Accordingly, Appendix O and related contents (such as Section D.5.5) in the JTD must be revised.</p>	<p>The new Order will replace the information provided in Appendix O and the text in Section D.5.5 has been revised to reflect this information accordingly.</p>	<p>Section D.5.5 and Appendix O</p>	<p>Completed</p>

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County of Los Angeles LEA	<p>1) Page B.3-4 Section 3.7.1 ACCESS ROADS: No response or change was made to the original comment submitted by the LAC LEA regarding the percent grade (%) which is described in the current County JTD. Based on past observations and a notice of violation which was recently issued to the facility for access roads, the County LEA feels strongly that the maximum 7 percent (%) grade for access roads accessing the working face needs to be included into the proposed City / County JTD.</p>	The text in Section B.3.7.1 of the JTD has been revised to describe the grades for the access roads.	Section B.3.7.1	Completed
County of Los Angeles LEA	<p>2) Page B.3-10 Section 3.7.10 FUELING AREA: Since the authoring of this JTD, the sole underground storage tanks has been removed from the facility. Also, all heavy equipment is currently fueled via the wet hose method by either BFI owned service / fuel vehicles or third party fuel trucks. This section should be updated to reflect those changes.</p>	The text in Section B.3.7.10 has been revised to reflect the current fueling operations at the site. Figure 13 has been revised to remove fueling facilities.	Section B.3.7.10	Completed
County of Los Angeles LEA	<p>3) Page B.3-13 Section B.3.7.14 TRASH ROLL OFF BOXES: In the past County LEA staff has been requested by Sunshine Canyon Management to approve the storage of additional trash roll off boxes, within the County Extension Landfill, for use by the waste hauling division of Allied Waste. If it is still the intent of the facility to store additional roll off boxes for the waste hauling division, the quantity of boxes must be provided. Also provide a description of how the additional box storage affects the peak traffic volume, and whether or not the additional box storage was considered when providing the peak vehicle traffic volume information submitted with the permit application?</p>	The box storage does not affect traffic because the roll-off trucks come in full and dump and then switch out the empty box for a different size box. Therefore, they are all landfill related trips.	Section B.3.7.14	Completed
County of Los Angeles LEA	<p>4) Page B.4-5 Section B.4.5 LIGHTING: Although the location, number, and types of permanent lighting has been provided, insufficient information is provided for portable lighting.</p>	Portable/temporary lighting will vary depending on wattage, size of area to illuminated, and type of lighting units since lighting technology is changing which provides more light with less glare and lower emissions as has been tested with the Super Tower light recently demonstrated at the site. Section B.4.5 of the JTD has been revised to reflect this information.	Section B.4.5	Completed
County of Los Angeles LEA	<p>5) Volume 1 Table 6 LANDFILL EQUIPMENT lists only 3 portable Light Plants to be used for night time operations. The current quality of portable light plants indicated in the County JTD is 9. Based on a 6,600 TPD waste streams, 9 Light Plants seen adequate. The LEA opines that for the combined site tonnage of 12,100 TPD. The facility will require more portable Light Plants than what is currently approved for current County only operations.</p>	The County JTD assumed conventional lighting; however, new lighting technology provides more light with less light plants and generators as with the Super Tower light recently trialed at the site. Table 6 of the JTD has been revised to list 3 to 9 plant stands available for portable/temporary lighting at the site.	Table 6 and Section B.4.5	Completed

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County of Los Angeles LEA	<p>6) Page B.4-5 Section B.4.7.1 <u>NUMBERS OF STAFF AND THEIR RESPONSIBILITIES:</u> The current JTD for County operations lists 3 Operations Supervisors for a 6,600 TPD operation. Only 2 Operations Supervisors are being proposed for the 12,100 TPD operations. The LEA does not agree with the proposed 2 Operations Supervisors, and has determined that a minimum of three supervisors would be adequate numbers to oversee the disposal operation being proposed.</p>	<p>The two Operations Supervisors, combined with the Site Manager, General Manager and Environmental Manager provides adequate supervision throughout the day.</p>	<p>No section amended.</p>	<p>Completed</p>
County of Los Angeles LEA	<p>7) Page B.4-10 Section B.4.7.3 <u>SUPERVISORY STRUCTURE:</u> Lists 2 Operations Supervisors. Volume III, Appendix H, Table 7 (should be 1) lists 3 Operations Supervisors.</p>	<p>Table 1 of Appendix H of the JTD has been revised to reflect two Operations Supervisors.</p>	<p>Table 1 of Appendix H</p>	<p>Completed</p>
County of Los Angeles LEA	<p>8) Page B.4-5 Section B.4.7.2 <u>PERSONNEL TRAINING:</u> No information was provided regarding the training and training records for the temporary records laborers who will be working at the facility. No information regarding the temporary laborers and pursuant to 27 CCR Section 20610 is provided.</p>	<p>Section B.4.7.2 of the JTD has been revised to describe temporary labor training.</p>	<p>Section B.4.7.2</p>	<p>Completed</p>
County of Los Angeles LEA	<p>9) Page B.7-13 Section B.7.1.6 <u>LITTER:</u> The 7th bullet in this section identifies a neighborhood survey plan. A reference to the location / section where this neighborhood survey plan is located within this JTD should be provided to ensure that the plan is being implemented and complied with.</p>	<p>The neighborhood survey plan is not included in the JTD. The text has been revised to state that a copy of the plan is available on-site for regulatory review.</p>	<p>Section B.7.1.6</p>	<p>Completed</p>

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County of Los Angeles LEA	<p>10) Volume II Appendix H Section 6.2.1 <u>RANDOM SELECTION OF VEHICLES:</u></p> <p>The Amended Zone Change Ordinance for the City and Replacement Conditional Use Permit for the County required that the most restrictive conditions be incorporated for the Combined Landfill. Condition 17.BB.1 of the City SWFP requires that a minimum of 1.5 random load checks be performed per every 1,000 tons of waste received at the landfill.</p> <p>Condition 17 B.1.b.1 of the County SWFP requires that a minimum of six (6) random load checks be performed daily at the facility and that the number of random load checks will be increased by a minimum number of one load check for every 650 tons of waste disposed beyond 4,000 tons to the maximum permitted 6,600 tons per day of refuse per day. Based on these requirements incorporated into the two permits, the County SWFP is more restrictive. The number of random vehicle load checks required in the RANDOM LOAD CHECK PROGRAM for the proposed City / County Landfill should be based on the current County SWFP.</p>	<p>When the math is done the City load check requirements equal to 18.15 load checks for 12,100 tons. The County load check requirements result in 18.46 load checks for 12,100 tons. Therefore, essentially both City and County load checks are equivalent. No changes are proposed to the load check requirements presented in the ITD.</p>	No section amended.	Completed
County of Los Angeles LEA	<p>Comment # 1: On July 31, 2007 the SWMP/LEA approved the decommissioning of perimeter monitoring probes P-211 and P-212 to allow for construction of Phase V of the County Extension Landfill. Upon completion of Phase V Part B, construction of the eastern perimeter access road and approval from the County LEA and Air Quality Management District (AQMD,) replacement probes P-239 and P-240 are to be installed. Replacement of P-211 and P-212 should be based on the original Decommissioning and Replacement approval for the County Extension Landfill and not on the approval of the SCL City/County consolidation.</p>	<p>The previous documentation and approvals have been incorporated into the JTD.</p>	<p>Section B.7.2.5 and Figure 20.</p>	Completed
County of Los Angeles LEA	<p>Comment #2: Table 24 describes Perimeter Probes P-211 and P-212 as being tri-leveled probes and being in compliance with 27 CCR 20925(c) (1). Table 24 should reflect the current status of Probes P-211 and P-212 as approved in the County LEA approval letter dated July 31, 2007.</p>	<p>The previous documentation and approvals have been incorporated into the JTD.</p>	<p>Section B.7.2.5 and Figure 20.</p>	Completed
County of Los Angeles LEA	<p>Comment #3: Page B.7-3 Local Brush Fires: Paragraph 2 describes the Los Angeles County Fire Department Air Operations Section as the unit which has requested the pads for use in supporting local fire fighting efforts. This section should indicate that the pads are located on the City side of the landfill and that City of Los Angeles Fire Department Air Operations will also utilize the facilities.</p>	<p>The text has been revised to reflect the City Fire Department as well as the County Fire Department.</p>	Section B.7.1.1	Completed

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County of Los Angeles LEA	Comment #4: Page B.7-4: Item #6 describes the access to site water for use by the fire department fill the "planes/use". The word "plane" should be changed to "helicopter" to reflect the actual use.	The text has been revised to indicate "helicopter" instead of "planes".	Section B.7.1.1	Completed
County of Los Angeles LEA	Comment #5: Drawing 8 identifies the existing perimeter channel between existing Basin "A" and existing Basin "B" on the County side of the facility as the limit of refuse per the legend. Based on this drawing, the existing perimeter channel should be clearly defined.	The leader line points to the channel which is exhibited in the existing topographic contours in gray beneath the refuse limit line.	No section amended.	Completed
County of Los Angeles LEA	Comment #6: No Table 5 is provided in this document as identified on Page 2 of Table 2 under "Cover Frequency".	The table is embedded in the text in Section B.5.2.1; however a stand alone Table 5 has been added to the Tables at the back of the report.	Stand alone Table 5 added to text.	Completed
County of Los Angeles Dept. of Public Works	1. Section A.2.1.2, Proposed Design Features, provide a discussion on the net remaining disposal capacity and total disposal capacity of the site expressed in tonnage as of May 19, 2007.	Section A.2.1.2 of the JTD is an introduction section which summarizes the information to be presented in subsequent sections of the document. The requested information regarding net remaining disposal capacity and total disposal capacity is discussed in detail in Sections B.3.2 and B.3.3. Section A.2.1.2 will not be revised since the requested information is already presented later in the text.	No section amended.	Completed
County of Los Angeles Dept. of Public Works	2. Section A.2.1.2, Proposed Design Features, verify the accuracy of the total landfill acreage for the combined City/County Landfill, which is stated as 379 acres.	The total landfill acreage was determined utilizing CADD software calculations. The area utilized for landfilling from the perspective of the current solid waste facility permits will increase from 246 acres (84 in SCL City and 162 in SCL County) to 379 acres (199 in SCL City and 180 in SCL County). The 199 acre figure includes the 12-acre 500 foot setback area to the north which will consist of soil fill only with no MSW. When this is taken into account the disposal area in the City is actually 187 acres which is within the 194 acres allowed by the City Zone Change and replacement CUP for a total disposal acreage of 367 acres.	No section amended.	Completed
County of Los Angeles Dept. of Public Works	3. Section B.3.7.9, include a discussion to clarify whether collected leachate from the City portion of the landfill may or may not be discharged into the landfill mass. If the discharge is not permitted, explain why it is permitted on the County-side and not on the City-side.	See Section C.3.5.6 of JTD which discusses leachate reintroduction for the entire landfill. The current WDR Order No. R4-2007-0023 for the County issued in 2007 allows for leachate reintroduction over the double liner area, as part of this JTD the applicant is asking to do the same over the double liner areas of the City portion.	No section amended.	Completed
County of Los Angeles Dept. of Public Works	4. Section B.3.7.14, Trash Roll-Off Boxes, revise this section to clarify the use of bins and roll-off containers stored on-site. Is the bin and roll-off container storage at the site related to landfilling activity only or are the bins and containers being stored for use by other enterprises owned by the operator, such as a waste hauling business?	The text has been revised to indicate that the bins are used for landfilling related activities only.	Section B.3.7.14	Completed
County of Los Angeles Dept. of Public Works	5. Table 23, Sunshine Canyon City/County Landfill Volumetric Capacity Summary, add a column showing equivalent tonnage for all data shown.	The table has been revised as requested.	Table 23	Completed

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County of Los Angeles Dept. of Public Works	6. Drawing 5, Sunshine Canyon Landfill JTD 2007 Existing Site Plan, the elevations shown as existing grades are the same as the proposed final elevations in Drawing 3, Sunshine Canyon Landfill JTD 2007 Final Grading Plan. Revise Drawing 5 to show the current elevations of the site.	The drawing was mis-titled. It has been corrected to "Proposed Site Plan".	Drawing 5	Completed
County of Los Angeles Dept. of Public Works	7. Pursuant to the County's CUP, BFI must submit and obtain Public Works prior approval for the proposed fill sequencing plan, cell developments, and airspaceusage-by-year analysis (in cubic yards and tons) for a ten year period that is consistent with the proposed development of the combined Sunshine Canyon City/County Landfill.	Comment noted. This comment is related to the Conditional Use Permit and is not related to the adequacy of the JTD. This comment has been addressed directly to the Los Angeles County Department of Public Works under a separate response to comment package.	No section amended.	No action required in regards to the JTD. Response letter to the LADPW has been sent.
County of Los Angeles Dept. of Public Works	8. Provide verification and certification by a licensed surveyor that the installed survey monuments are in place as approved by Public Works on November 29,2007 (copy enclosed), and installed along the Phase V area perimeter. Pursuant to Condition 18 of the County's CUP, the existing survey monuments approved by Public Works and installed along the perimeter of the County Project, as defined, can only be removed or disturbed upon Public Works' prior approval and verification that BFI has fulfilled the County's CUP requirements for operating a combined Sunshine Canyon City/County Landfill (refer to the County Chief Executive Officer's letter dated November 15, 2007(copy enclosed)). In Drawing 9, Sunshine Canyon Landfill JTD 2007 Phase CC-1 Excavation, a note should be added indicating that the proposed excavation requires prior approval of Public Works.	Comment noted. This comment is related to the Conditional Use Permit and is not related to the adequacy of the JTD. This comment has been addressed directly to the Los Angeles County Department of Public Works under a separate response to comment package.	No section amended.	No action required in regards to the JTD. Response letter to the LADPW has been sent.
County of Los Angeles Dept. of Public Works	9. Pursuant to Condition 40 of the County's CUP, provide evidence that all testing and remedial actions required by the California Regional Water Quality Control Board to detect, prevent, and/or correct groundwater contamination and landfill gas leakage into the subdrain system has been completed to the satisfaction of the Water Quality Control Board.	Comment noted. This comment is related to the Conditional Use Permit and is not related to the adequacy of the JTD. This comment has been addressed directly to the Los Angeles County Department of Public Works under a separate response to comment package.	No section amended.	No action required in regards to the JTD. Response letter to the LADPW has been sent.
County of Los Angeles Dept. of Public Works	10. Section F.1.4, Demonstration of Financial Responsibility, Closure/Postclosure Maintenance Fund, the section only discusses financial assurance for the City portion of the landfill. Revise to include a discussion and associated evidence of financial assurance for closure and postclosure maintenance for the County portion of the landfill consistent with the requirements of the County's CUP.	The text in Section F.1.4 includes the totals currently included in the Certificates of Insurance for the City and County Closure costs and County Post-Closure costs.	F.1.4	Completed

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County of Los Angeles Dept. of Public Works	11. Section F.1.4, Demonstration of Financial Responsibility, Closure/Postclosure Maintenance Fund, provide an updated Table 18, Closure Cost Estimate, and Table 19, Postclosure Cost Estimate, based on current State regulations and reflect the proposed build-out sequence of the County portion (i.e. considering the total waste in-place and subsequent tonnage for each year) and proposed final build-out design for the ultimate City/County Landfill.	The closure is a phased closure and the costs presented in Table 19 reflect closure of the largest area ever requiring closure as shown on Table 21 pursuant to 27 CCR, Section 21820. Table 21 will be revised to include an additional column which presents an estimated cost to close each phase of the landfill.	Table 21	Completed
County of Los Angeles Dept. of Public Works	12. In Part E, Preliminary Closure and Postclosure Maintenance Plan, revise the plan to show the maintenance of the site in perpetuity pursuant to CUP Condition 32, and show evidence of financial assurance.	Comment noted. This comment is related to the Conditional Use Permit and is not related to the adequacy of the JTD. This comment has been addressed directly to the Los Angeles County Department of Public Works under a separate response to comment package.	No section amended.	No action required in regards to the JTD. Response letter to the LADPW has been sent.
County of Los Angeles Dept. of Public Works	13. Hydrologic map showing the subbasins delineation and hydrologic design data for the Terminal-B drainage area of the landfill (see Table 1, Appendix J of the JTD).	Figure 6 - Drainage TB Hydrology Map, was inadvertently left out of Appendix J. The figure is provided for inclusion into Appendix J.	Figure 6 for Appendix J	Completed
County of Los Angeles Dept. of Public Works	14. Hydrologic map showing the subbasins delineation for the entire Sunshine Canyon Landfill. The map should show how the different subbasins connect with each other and the sedimentation basins, and the paths through which surface flows from the landfill are conveyed to the Terminal Basin.	Figure 6 - Drainage TB Hydrology Map, was inadvertently left out of Appendix J. The figure is provided for inclusion into Appendix J. The 6 figures in Appendix J collectively provide the requested information.	Figure 6 for Appendix J	Completed
County of Los Angeles Dept. of Public Works	15. Electronic files and hard copies of the input and output parameters from the CivilDesign LAR04 Modified Rational Method (MODRAT) computer program used in the hydrologic analysis.	Questa has provided the back-up data for the MODRAT and the data on CD will be provided to the Los Angeles County Department of Public Works.	No section amended.	Completed
County of Los Angeles Dept. of Public Works	16. Electronic files and hard copies of the input and output parameters from the "HECHMS" computer program used in the reservoir routing analyses. Also, provide the stage-storage-discharge tables for the existing and proposed sedimentation basins in the landfill.	Questa has provided the back-up data for the HECHMS and the data on CD will be provided to the Los Angeles County Department of Public Works.	No section amended.	Completed
County of Los Angeles Dept. of Public Works	17. Provide an updated geotechnical report that addresses the latest landfill design as presented in the current JTD. The report must provide, but not be limited to, updated slope stability analyses of all proposed final refuse slopes per the requirements set forth in Title 27 of the California Code of Regulations. Also, provide a geologic cross section for each section analyzed showing the critical failure plane used in the analyses. Show locations of the cross sections used in slope stability analyses on the geologic map. Recommend mitigation if factors of safety are below minimum standards.	The stability analysis has been reviewed and revised by GeoLogic Associates based on discussions at the meetings on March 25 and May 7, 2008 with the agencies regarding this issue. Appendix N has been revised accordingly.	Appendix N	Completed

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County of Los Angeles Dept. of Public Works	18. The plans indicate that the proposed work is self-contained within the landfill property lines. The consulting geotechnical engineer and engineering geologist of record must provide a statement in conformance with Section 111 of the Los Angeles County Building Code indicating that the proposed grading will have no adverse effect on offsite property.	Comment noted. This comment is related to the Conditional Use Permit and is not related to the adequacy of the JTD. This comment Has been addressed directly to the Los Angeles County Department of Public Works under a separate response to comment package.	No section amended.	No action required in regards to the JTD. Response letter to the LADPW has been sent.
County of Los Angeles Dept. of Public Works	19. Pursuant to Condition 6 of the County's CUP, and as required by the Los Angeles County Countywide Siting Element, prior to operation of the City/County Landfill, BFI must obtain (and submit to Public Works evidence of) a "Finding of Conformance" determination by the Los Angeles County Integrated Waste Management Task Force that the proposed project is consistent with the Siting Element.	Comment noted. This comment is related to the Conditional Use Permit and is not related to the adequacy of the JTD. This comment has been addressed directly to the Los Angeles County Department of Public Works under a separate response to comment package.	No section amended.	No action required in regards to the JTD. Response letter to the LADPW has been sent.
County of Los Angeles Dept. of Public Works	The removal of Basin C will result in major changes in the landfills drainage pattern. The new hydrologic analysis for the landfill performed by Questa Engineering Corporation is not consistent with the proposed drainage pattern and drainage conveyance structures shown in the current JTD. As an example, the peak outflow calculated for Basin A in the current JTD is 479 cubic feet per second (cfs). The proposed Channel 2, which conveys the peak outflow from Basin A directly to the Terminal Basin, is shown on the hydrologic map to have a capacity of only 147 cfs.	Drainage from basin D will no longer go to basin A, but will go to basin B instead, lowering the flows to basin A when compared t the current County drainage system. The 147 cfs refers to the peak flow out of basin A and not the capacity of channel 2. Tables 4 and 5 were missing in the hydrology study included in Appendix J. The data in these tables present the actual capacity of the basins and channels.	Tables 4 and 5 of Appendix J	Completed