



Understanding the Unintended Consequences of the Order of Abatement at Sunshine Canyon Landfill

The South Coast Air Quality Management District's (AQMD) proposed order of abatement regarding operations at Sunshine Canyon Landfill has created a public debate over the plan's effectiveness, as well as the unintended consequences it would create for other communities.

Whether you are opposed to landfills in general, feel there are better ways to manage the region's waste stream or support the current infrastructure for waste disposal, the following information has been developed to answer questions and provide insights into the unintended consequences that the order of abatement would have on our neighbors at Sunshine Canyon Landfill, as well as residents surrounding other area landfills.

The Facts

- Sunshine Canyon Landfill currently accepts 9,000 tons of waste per day, accounting for a third of the county's waste.
- The order of abatement would reduce Sunshine Canyon's daily intake from 9,000 tons to 6,000 tons of waste. The difference - 3,000 tons of waste - would have to be diverted to other nearby landfills on a daily basis.
 - Diverting 3,000 tons of waste to nearby landfills would require approximately 150 to 175 semi-trailers every day to transport the waste.
 - The decision of where to divert the waste would be based on the costs associated with transporting the waste. Operators would understandably select the most economical options. This means that the landfills closest in proximity to Sunshine Canyon would likely be selected.
- The order of abatement would require the Landfill to open at 9:00 a.m., which is three hours later than the current opening time of 6:00 a.m.
 - Opening the facility at 9:00 a.m. would disrupt the waste collection system throughout the region, and it would require roughly 150 to 175 additional large semi-trailers hauling waste on local roadways during peak drive times.

Excerpt from a letter from Robert J. Potter, Division Manager of the LA Bureau of Sanitation, to Mohsen Nazemi, Deputy Executive Officer at the AQMD, dated June 6, 2016:

"In the event that the order of abatement conditions are imposed, LASAN will need to deliver City waste collected between 6 a.m. to 9 a.m. to other facilities. A contingency plan could be implemented as follows:

- West Valley: Deliver household refuse loads to Calabasas Landfill or Simi-Valley landfill
- East Valley: Deliver household refuse loads to CLARTS or Simi-Valley landfill
- Western: Deliver household refuse loads to SCD or CLARTS
- North Central: Deliver household refuse to CLARTS, Republic Transfer Stations, WM facilities, or LAC-San facilities
- CLARTS: Deliver household refuse to WM El-Sobrante landfill or other contingent WM landfills allowed by contract."

- Landfill experts continue to explain that the diversion of waste and reduced operating hours called for in the order of abatement would clearly create numerous unintended consequences, including:
 - Affecting capacity at other area landfills
 - Dramatically increasing the number of semi-trucks traveling long distances on local roadways to haul the diverted waste
 - Generating odor in communities through which the roughly 150 to 175 trucks will pass, which will become more odorous in containers used for hauling long distances
 - Creating other unintended environmental impacts, such as:
 - Traffic air emissions
 - Increased fuel usage
 - Additional traffic congestion
 - Additional wear on area roads
 - More collection vehicles operating during rush hour
 - Increased costs to LA City Bureau of Sanitation, County Garbage Disposal Districts and ultimately tax payers
- The AQMD has indicated that the order of abatement is needed to address more than 3,000 odor complaints coming from Granada Hills' residents. However, during 2009 to 2013, nearly 70 percent of those complaints originated from only 20 addresses in Granada Hills.
- The Landfill has made significant site enhancements in recent years to control odor, and AQMD has said on multiple occasions that the landfill gas system enhancements are working.
 - **“They (now) have the capability to burn it off, so it doesn’t become a nuisance to the community. As the gas collection system improves, they are able to collect more gas, so the problem is significantly reduced”**
Mohsen Nazemi, Deputy Executive Officer for AQMD in the Los Angeles Daily News, February 10, 2016
- The order of abatement would not be the first time AQMD’s proposed solutions have resulted in unintended consequences. For example, the County Public Works Department requires the Landfill to apply 9 inches of soil cover on waste at the end of each day in order to manage odor.

To an untrained individual, 9 inches of daily cover, as compared to the industry standard of 6 inches, would seem like a good solution, but in reality the requirement has had an adverse effect on landfill gas collection systems. The technical experts at Sunshine Canyon, many of whom are engineers with years of landfill management experience, have repeatedly explained to AQMD officials the negative ramifications of applying 9 inches of soil cover.

- As a responsible operator, Sunshine Canyon Landfill has been making improvements to its landfill gas collection system, and the team is fixing the gas collection infrastructure that has been affected or damaged by the requirement to apply 9 inches of soil cover.

Regardless of where you stand on the Landfill, there is one major issue that cannot be ignored -- if Sunshine Canyon Landfill’s daily intake of waste is reduced by 3,000 tons per day, the waste will have to go other area landfills.

Additional information regarding the unintentional consequences of the order of abatement is available at <http://sunshinecanyonlandfill.com/engagement>.