CALIFORNIA
Water Boards

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SECRETARY FOR
ENVIRONMENTAL PROTECTION

Los Angeles Regional Water Quality Control Board

July 1, 2014

Ms. Patti Costa, Environmental Manager
Sunshine Canyon Landfill
14747 San Fernando Road
Sylmar, CA 91342

COMMENTS ON WEST DRAINAGE CHANNEL MASTER PLAN - SUNSHINE CANYON LANDFILL, SYLMAR, CALIFORNIA (FILE NO. 58-076, ORDER NO. R4-2008-0088, WDID NO. 4B190329001)

Dear Ms. Costa:

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board), has received from you a report titled *Surface Water Drainage Analysis, West Drainage Channel Master Plan, Sunshine Canyon Landfill, Los Angeles County, California* (Plan), dated March 2014, prepared by GeoLogic Associates, and submitted to the Regional Board on March 28, 2014.

The Sunshine Canyon (Landfill) is a Class III municipal solid waste landfill that is owned and operated by Republic Services Company and regulated under wasted discharge requirements (WDRs) included in Order No. R4-2008-0088 adopted by the Regional Board on October 2, 2008. In a letter dated August 29, 2013, the Regional Board staff approved a design report for the Phase CC-3B liner construction at the Landfill, with the condition that a detailed design plan for the West Drainage Channel, a permanent storm drain that will be constructed concurrently with the proposed Phase CC-3B liner system, be submitted for the approval of Regional Board staff. The Plan was submitted to meet this condition. Meanwhile, the Plan was also submitted to the Los Angeles County Department of Public Works (LACDPW) for its review.

Regional Board staff has reviewed the Plan and consulted with staff of the LACDPW on the technical aspects of the proposed design. The LACDPW provided its comments on the Plan with a letter addressed to you dated June 16, 2014 (copy attached). The Regional Board staff concurs with those comments in the LACDPW letter and has additional comments on the Plan as follows:

1. A significant portion of the proposed drainage channel will be constructed on top of the City Landfill Unit 1, which has been closed since 1971. A major concern is that differential settlement within the waste mass of the closed landfill could cause serious damage to the proposed concrete channel once it is constructed. Although the Plan proposes a cross section for the portion of the drainage channel over the waste mass (Drawing No. C12) that is different from the cross section for the portion of the channel over native soil (Drawing No. C11), it does not include a discussion to demonstrate that such a design will be adequate to prevent significant damages to the channel that may be caused by differential settlement.

2. Attachment C of the Plan includes drawings of maps, cross sections, and detailed layout of the proposed drainage channel. However, there is no discussion in the Plan to illustrate the purpose of each drawing. Many features and symbols in those drawings are not adequately labeled or referenced. This makes the drawing hard to following and in some cases, not legible. For example, Drawing No. C10 presents two cross sections (Section A-A' and Section B-B'), but there is not a map showing where those cross sections are located and no explanation on the purpose of such cross sections is found in the Plan.

3. Section 5 and Attachment H of the Plan discuss an alternative outfall alignment for the proposed West Drainage Channel. Since the alternative layout involves an extension of the proposed channel line and the excavation of wastes that have been disposed of at the closed City Landfill, a revised design plan must be reviewed and approved by the Regional Board and other regulatory agencies with jurisdiction over the landfill, if the drainage channel is constructed following the alternative outfall alignment.

4. Section D.1. of the WDRs requires that "*All containment structures and erosion and drainage control systems at the Landfill shall be designed and constructed under direct supervision of a California-registered civil engineer or certified engineering geologist, and shall be certified by the individual as meeting the prescriptive standards and/or performance goals of 27 CCR.*" Such a certification is not included in the Plan.

Please address the above comments and the comments provided by the LACDPW in its letter dated June 16, 2014, and submit a revised design plan for the project. Construction of the proposed drainage channel shall not be started until a design plan and final construction plans for the project are approved by the Regional Board staff.

If you have any questions, please contact Dr. Wen Yang, Chief of the Land Disposal Unit, at (213) 620-2253 or wyang@waterboards.ca.gov.

Sincerely,

Samuel Unger

Samuel Unger, P.E.
Executive Officer

Enclosure: Letter from Los Angeles County Department of Public Works, dated June 16, 2014

cc: Emiko Thompson, Los Angele County Department of Public Works
Gerardo Villalobos, Sunshine Canyon Landfill LEA
David Thompson, Sunshine Canyon Landfill LEA
Eugene Tseng, City of Los Angeles, Environmental Affairs Department
Wayde Hunter, North Valley Coalition, Granada Hills

COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

GAIL FARBER, Director

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P.O. BOX 1460
ALHAMBRA, CALIFORNIA 91802-1460

June 16, 2014

IN REPLY PLEASE
REFER TO FILE: EP-5

Ms. Patti K. Costa
Environmental Manager
Sunshine Canyon Landfill
14747 San Fernando Road
Sylmar, CA 91342-1021

Dear Ms. Costa:

WEST DRAINAGE CHANNEL MASTER PLAN
SURFACE WATER DRAINAGE ANALYSIS REPORT
SUNSHINE CANYON CITY/COUNTY LANDFILL

We reviewed your Surface Water Drainage Analysis report for the West Drainage Channel Master Plan dated March 2014 pursuant to Condition No. 38 of the Sunshine Canyon City/County Landfill Conditional Use Permit No. 00-194-(5) and have the following comments:

- The Drainage Map, Figure 1, provided under Attachment D shall include adequate topography, clarity, and resolution to depict watershed delineation. Each subarea shall be clearly labeled, and subarea collection points shall be shown. The Time of Concentration path from the most remote point of the subarea to the outlet of the subarea shall also be clearly identified. Elevations at the top and at the outlet point of each subarea shall be shown. The paths through which surface flows from the subareas are conveyed to the proposed West Drainage Channel shall also be shown. All drawings including any details, as well as any attachments must be clearly legible in order to facilitate proper review.

- The final outlet from the downdrain/impact basin area into the Terminal Basin is not clearly depicted in any of the design plans or drainage plans. This information shall be provided in the resubmittal which shall include details for the connection of the West Drainage Channel to the Terminal Basin. Details should include but not be limited to alignment profile and cross sections.

- Subarea SA1 is greater than 40 acres and should be further divided to meet Public Works' hydrology standards. The optimum size for a subarea in the County approved Modified Rational Method model is 40 acres. However, smaller subareas are acceptable.

- Section 3.0 – "Surface Water Drainage Analysis," references the Santa Clara River Watershed. However, the receiving drainage system for the Sunshine Canyon Landfill's watershed is Bull Creek, a tributary to the Los Angeles River which is part of the Los Angeles River Watershed. Accordingly, all drainage run-off analyses shall utilize parameters including fire factors, debris production rates, and peak bulk factors, attributable to the Los Angeles River Watershed, rather than the Santa Clara River Watershed.

- The assumption made in Section 4.0 – "Control Structure Sizing," regarding the non-additive nature of runoff flows generated by the surrounding tributary areas to the Western Drainage Channel cannot be claimed. Some flows will be additive to the 480 cubic feet per second peak outflow rate from Basin A. In order to identify the peak flow rate conveyed within the channel and the downdrain, hydrographs from Basin A and each subarea tributary to the West Drainage Channel must be routed together along the reaches of the West Drainage Channel to the Terminal Basin. The resulting peak outflow rate into the Terminal Basin shall be reevaluated to determine the cumulative flow routing effects due to various factors such as channel storage and timing.

- The current hydrologic analysis for the West Drainage Channel is not based on the topography at the point of the landfill's built-out condition. At build-out a substantial area, shown as the area highlighted in red on the enclosed Drainage Map, will become tributary to the West Drainage Channel. Also, not included in the hydrologic analysis is the contribution from the immediate area south of the trapezoidal channel shown as the area highlighted in yellow on the enclosed Drainage Map. Both of these areas shall be included in the hydrologic analysis.

- Under Attachment C, some of the "Alignment Profile" drawings did not reference the correct "Details" drawings. Detailed call-outs on drawings should be labeled correctly with appropriate symbols (as shown in Drawing No. G01) to ensure that all "Alignment Profile" and "Details" drawings are referenced appropriately.

Please address these comments and resubmit a revised West Drainage Master Plan for further review. If you have any questions, please contact Ms. Emiko Thompson at (626) 458-3521, Monday to Thursday, 7 a.m. to 5:30 p.m.

Very truly yours,

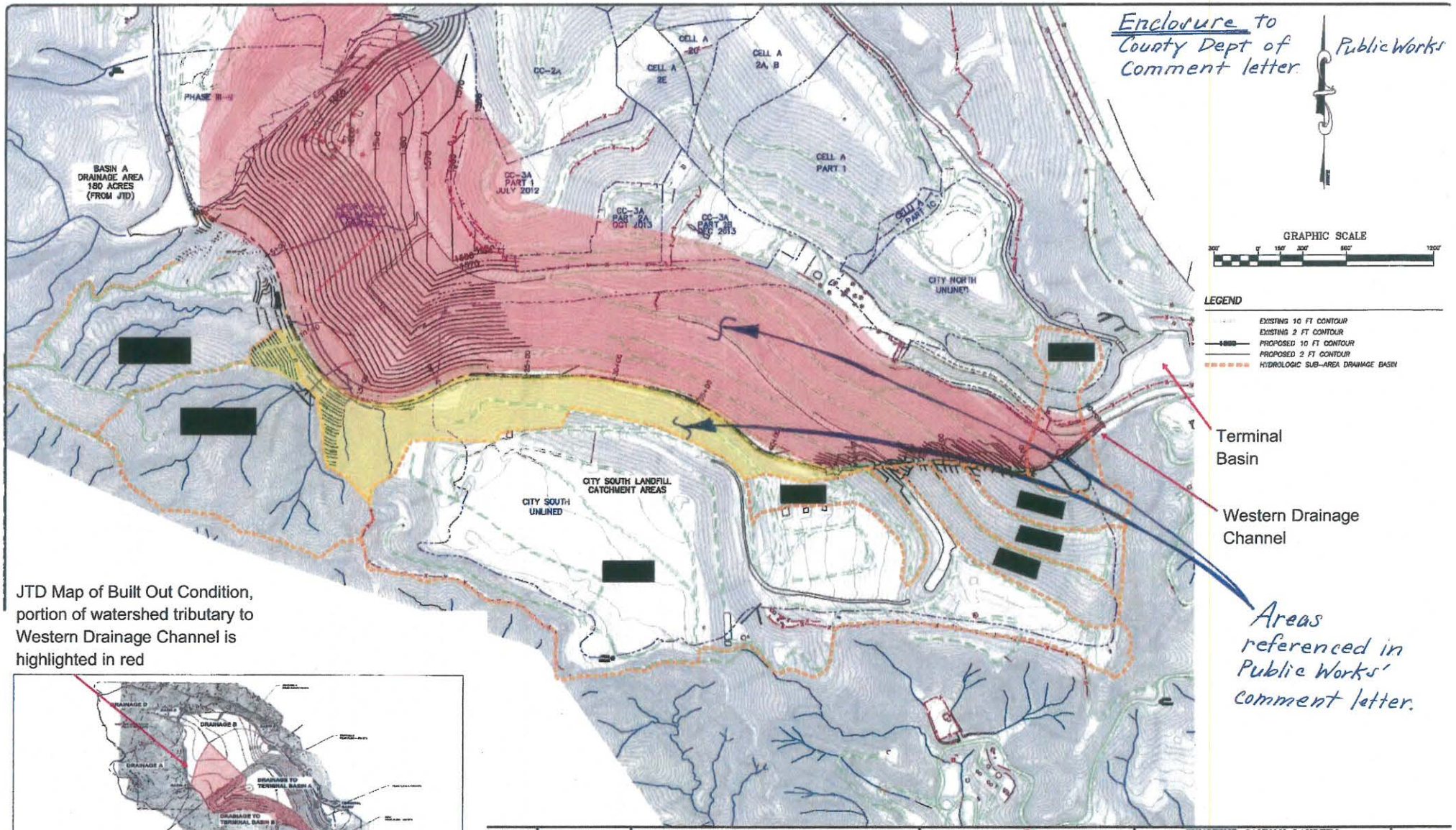
GAIL FARBER
Director of Public Works

PAT PROANO
Assistant Deputy Director
Environmental Programs Division

KM:dy
P:\Sec Western Drainage Master Plan

Enc.

cc: Regional Water Quality Control Board, Los Angeles Region (Wen Yang)
Sunshine Canyon Landfill Local Enforcement Agency (Gerry Villalobos)
Department of Regional Planning (Maria Masis)
City of Los Angeles Department of City Planning (Ly Lam)



JTD Map of Built Out Condition, portion of watershed tributary to Western Drainage Channel is highlighted in red

Geo-Logic ASSOCIATES

REPUBLIC SERVICES

SUNSHINE CANYON LANDFILL
WESTERN DRAINAGE MASTER PLAN
SYLMAR, CALIFORNIA
DRAINAGE MAP

FIGURE 1
PROJECT NO. 2014.0084

ISSUED FOR REVIEW

y in respect of the construction operation. ility or for any other purpose.