Odor Complaints & SCAQMD Enforcement Activities

Since 2009, the SCAQMD has received an increasing number of odor complaints, now totaling over 2,390, regarding operations at Sunshine Canyon Landfill. This is an order of magnitude greater than the combined total number of odor complaints received by the SCAQMD from the other 15 active landfills operating within our jurisdiction. In 2011 alone, approximately 20% of all air quality complaints received by the SCAQMD from all operations under our purview were odor complaints alleging Sunshine Canyon Landfill as the source. SCAQMD staff has responded to these odor complaints and, as a result of our investigations, since 2009 the SCAQMD has issued a total of 39 Notices of Violations to BFI / Republic Services for creating a public nuisance. In addition, SCAQMD staff has conducted approximately 360 site inspections of Sunshine Canyon Landfill operations during the same time period. Below are a table and a chart showing a summary of the odor complaints and enforcement actions taken by SCAQMD staff.

<table>
<thead>
<tr>
<th>Activity /Year</th>
<th>2009</th>
<th>2010</th>
<th>2011</th>
</tr>
</thead>
<tbody>
<tr>
<td>Odor Complaints</td>
<td>313</td>
<td>613</td>
<td>1,464</td>
</tr>
<tr>
<td>Notices of Violation</td>
<td>7</td>
<td>6</td>
<td>26</td>
</tr>
</tbody>
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Order for Abatement:

As a result of the above noted odor complaints and Notices of Violations issued for public nuisances, on October 26, 2011, SCAQMD filed a petition with our Hearing Board to amend the existing Stipulated Order for Abatement issued to BFI / Republic Services in 2010. The Hearing Board held three (3) days of hearings; on Saturday, November 19th and Tuesday, November 29th, 2011 at SCAQMD's office in Diamond Bar, and on Saturday, December 3rd, 2011 at the Valley Academy of Arts and Sciences in Granada Hills, where SCAQMD, BFI / Republic Services and members of the public testified and presented evidence.

The SCAQMD petition was supported by the following individuals and entities:

- U.S. Congressman Brad Sherman, 27th District, California
- Resolution from the Council of the City of Los Angeles
- Sunshine Canyon Landfill Local Enforcement Agency
- Sunshine Canyon Landfill Joint City/County Technical Advisory Committee
At the final hearing conducted on December 3, 2011, the Hearing Board unanimously approved amendments to the Stipulated Order for Abatement which provided significant additional mitigation measures to further address odors from Sunshine Canyon Landfill operations. In general, these additional measures included:

- Improved landfill gas collection and disposal system
  - Expedite installation of vertical and horizontal collectors, and additional flare
  - Hire consultant to evaluate immediate and future needs of the existing gas collection and disposal system
  - New permit application for gas system enhancements and flare
- Damage Prevention Work Plan
- Additional monitoring of the landfill surface
- Full-time Environmental Observers and Corrective Action Managers on duty 24/7 in the community and at the landfill, respectively, for odor identification / remediation
- Additional comprehensive ambient monitoring for toxics in the community

The more detailed conditions and associated timelines of the Amended Stipulated Order for Abatement include the following:

1. By December 9, 2011, present and begin implementation of a Master Plan that details the expedited installation of vertical wells and horizontal collectors to improve gas collection from the landfill interior gases, and subsequently evaluate whether current landfill gas collection systems are sufficient.
2. By December 9, 2011, submit and immediately implement procedures to minimize odors and emissions during installation and trenching of vertical wells and horizontal collectors.
3. By December 9, 2011, present and immediately implement a Damage Prevention Work Plan to prevent damage to the gas collection piping and well heads by vehicles, trucks and heavy equipment movement at the landfill.
4. By December 9, 2011, conduct landfill surface monitoring of all surfaces less than 30 degrees slope every 30 days and perform remediation of exceedances pursuant to an enhanced schedule. By January 6, 2012, slopes greater than 30 degrees shall be monitored at least twice a year.
5. By January 6, 2012, amend and expand the previously submitted Odor Plan of Action to include specific odor minimization strategies and techniques for all phases of landfill operations, and include the duties and responsibilities of an Environmental Monitor.
6. By January 6, 2012 provide a proposal for a physical modeling study to determine the odor and emission transport of odors from the landfill to the community. Study is to be completed and final report submitted no later than 150 days after SCAQMD approval.
7. By February 17, 2012, install a temporary landfill gas flare to destruct excess landfill gas collected by the upgraded collection system, and expedite installation of a permanent flare to replace the temporary flare.
8. Contract with an independent consulting firm to conduct environmental monitoring through an Environmental Monitor who can coordinate with the Corrective Action Managers to expend company resources without delay to take the necessary corrective actions to remediate sources of odors, including setting up a 24 hour dedicated odor complaint telephone line, and taking ambient air grab samples for analysis. The Environmental Monitor may not be fired without written approval by the SCAQMD.
9. Designate Corrective Action Managers on-site and available 24 / 7 to address, respond to, investigate and take corrective actions as necessary and feasible to remediate the source of odors.
10. Conduct air toxics monitoring of ambient air at the landfill and at Van Gogh Elementary School for a period of one year.