



COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

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GRACE ROBINSON HYDE
Chief Engineer and General Manager

March 2, 2016

VIA E-MAIL: Jeff.Hackett@CalRecycle.ca.gov

Jeff Hackett
Environmental Program Manager
Department of Resources Recycling and Recovery (CalRecycle)
Waste Permitting, Compliance and Mitigation Division
Permitting and Assistance Branch
1001 I Street
P.O. Box 4025 Mail Stop 10A-15
Sacramento, CA 95812-4025

Dear Mr. Jeff Hackett:

Public Comment Received on Calabasas Landfill Solid Waste Facility Permit

This letter addresses the concerns raised in an email dated February 4, 2016, by Mr. Evan Edgar regarding the usage of green waste as alternative daily cover (ADC) at the Calabasas Landfill.

The use of green waste as an ADC at the Calabasas Landfill was approved by CalRecycle (then California Integrated Waste Management Board) in a Solid Waste Facility Permit revision issued on September 22, 1993. The revision was issued after the completion of a green waste cover demonstration program. In accordance with California Code of Regulations Title 27§ 20690(b)(3), green waste is processed at the Calabasas Landfill to achieve the required grain size specification prior to application on the working face at a minimum compacted thickness of 6 inches and an average compacted thickness of less than or equal to 12 inches.

Section 7.4.2 of the Joint Technical Document for the Calabasas Landfill describes the use of ADC. The volumetric ratio of ADC to refuse is controlled by the area of the working face and depth of green waste used as ADC. A typical dimension of the sloped working face at the Calabasas Landfill is 120 feet from the toe to the top of the slope by 70 to 120 feet wide. Assuming a working face is 90 feet wide and the depth of ADC is 12 inches, the volumetric ratio of green waste ADC and the refuse in 2015 was 1 to 4.7 or approximately 21%. In terms of mass, the ratio of green waste to refuse in 2015 was 1 to 5.7 or approximately 17%. This ratio is calculated based on 160 tons per day (tpd) of green waste applied to the working face to 916 tpd of refuse disposed in 2015. These figures are consistent with the SWANA guideline cited by Mr. Edgar.

Mr. Edgar stated that the ADC to refuse ratio was 28% at the Calabasas Landfill in 2012 according to the 2014 CalRecycle Investigation. The landfill received an average 640 tpd of refuse in 2012, which was the lowest tonnage received at the site since the 1960s. However, as discussed above, the volume of the green waste applied as ADC is dependent on the size of the working face, which does not change substantially with the variation in refuse tonnage. When CalRecycle visited the landfill as part

of their investigation, the District demonstrated that the application of green waste was in compliance with the current regulations and operation plans.

Mr. Edgar also asserted that the ADC to refuse ratio should be less at larger landfills. This statement alludes to the fact that the ratio of ADC to refuse is an inverse relationship; as the tonnage of refuse increases, the ratio of ADC to refuse decreases. This is substantiated by the ratio of ADC to refuse at the Calabasas Landfill, which decreased from 28% when the average tonnage of refuse was 640 tpd in 2012 to 17% when average tonnage of refuse increased to 916 tpd in 2015.

Although Mr. Edgar may consider the Calabasas Landfill, based on its permitted capacity of 3,500 tpd, to qualify it as a larger landfill, it should be noted that the average tonnage received in 2015 was 915 tpd and was as low as 640 tpd in 2012.

Mr. Edgar's final concern was about the setting of new policy precedent by allowing "...greenwaste [sic] ADC use over 20%...." The precedent was set through the rule-making process when the regulations governing green waste use as ADC were adopted. The standard is not a ratio of ADC to refuse. It is based on the thickness of compacted green waste that is applied as ADC.

As discussed above, the use of green waste at the Calabasas Landfill is consistent with the current Title 27 regulations and the ADC demonstration project that was completed in 1993. We believe that Mr. Edgar's concerns regarding ADC should have no bearing on your decision regarding the proposed revision of the Calabasas Landfill permit.

If there are any questions, please contact me at (562) 908-4288, extension 2716.

Very truly yours,



Christopher R. Salomon
Supervising Engineer
Planning Section

CRS:CC:ddg

cc: Mr. Mark de Bie, CalRecycle (Mark.deBie@CalRecycle.ca.gov)
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