



COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

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Chief Engineer and General Manager

September 5, 2007

File No.: 31R-100.10

Ms. Bobbie Garcia
California Integrated Waste Management Board
Permitting and Enforcement Division
1001 "I" Street
Sacramento, California 95812-4025

Dear Ms. Garcia:

Comments on Draft Table of Risk Factors (Task 6, Step 2 of ICF Work Plan)

Thank you for the opportunity to comment on the proposed risk factors, which provides the initial framework for evaluating the overall potential risks posed by individual landfills. These risk factors—as indicated under Task 6 of the Scope of Work to ICF Consulting Services—would be used as a screening method to determine the overall financial assurance coverage levels required for each landfill based on risk. Given that the screening method will rank an individual landfill's risk as high, medium, or low, it is important that the screening be refined enough to capture all the contributors to a risk, eliminate those factors that do not contribute to risk, and account for established controls or mitigation measures that curtail risk. As proposed, the draft table of risk factors do not offer this level of refinement.

The draft risk factor table has the following deficiencies:

- **Overly Simplistic.** Risk factor categories are too broad in nature to account for site characteristics and the engineering already in place since Subtitle D and Title 27 have been enacted. Some factors in and of themselves are not a risk; only coupled with other factors would a risk exist.
- **Risks Should Not Be Weighted Equally.** Some risk factors may contribute more to the overall risk than others. Consequently, all risk factors should not have equal weight. Each risk factor should be assigned a percent of the total risk.
- **Magnitude of Impact vs. Probability.** The draft risk factor table does not separate magnitude of an impact from the probability of an impact occurring. The level of impact is different than how likely is an impact to occur.
- **Overly Broad Response Measures.** Control and mitigation measures are too broad in description to be of any value. There are controls and mitigation measures at landfills, such as extraction wells and subsurface barriers, which have been in place for many years that prevent or curtail risk and should therefore be delineated in the table.
- **Not Every Resource Is Impacted by an Event or Impacted Equally.** An impact does not necessarily affect all natural resources, and the degree of impact is not equal across all resources. For example, a "leak" through an unlined landfill with highly permeable soil and a high groundwater table would impact the underlying groundwater—but the "leak"

itself would not lead to landfill gas migration. Consequently, there should be a ranking of what is likely to be impacted the most.

To illustrate the level of refinements needed to the proposed risk factor table, the table in Attachment A attempts to further delineate each risk factor into more meaningful sub-classifications and incorporates potential "fixes" to the issues raised above. However, the number of risk factor sub-classifications needed to adequately portray a true scenario could be high and modeling risk could be difficult. Consequently, we propose an alternative approach in evaluating and ranking risks.

Attachment B is an alternative approach at evaluating potential risks. It focuses on what risk factors could impact a particular resource. This approach is not too different from an Initial Study conducted for a proposed project under the California Environmental Quality Act where each resource on the checklist is evaluated to determine if a project has a significant impact, less than significant impact (with or without mitigation), or no impact. The table in Attachment B starts with a resource, such as groundwater or surface water, and then lists risk factors that could impact that resource. An overall risk for that resource is determined after taking into account existing regulatory controls, specific control or mitigation measures, buffer zones, topography, compliance status, and other risk-curtailling measures.

I would be more than happy to meet with you to discuss the above-mentioned comments. Please feel free to contact me at (562) 908-4288, extension 2723.

Very truly yours,

Stephen R. Maguin



Glenn Acosta
Senior Engineer
Planning Section

GA:ld

Attachment