

FINAL

2019 Annual Compliance Report for Chiquita Canyon Landfill

Prepared for:

Los Angeles County Department of Regional Planning



CHIQUITA CANYON

A Waste Connections Company

July 2020

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Acronyms and Abbreviations

CAC	Community Advisory Committee
Caltrans	California Department of Transportation
CCL	Chiquita Canyon Landfill
CUP	Conditional Use Permit
GCCS	LFG collection and control systems
IMP	Implementation and Monitoring Program
LACDPW	Los Angeles County Department of Public Works
LADRP	Los Angeles County Department of Regional Planning
LEA	Local Enforcement Agency
LFG	landfill gas
LFGTE	LFG to energy
MMRP	Mitigation Monitoring and Reporting Program
MSW	municipal solid waste
NOV	Notice of Violation
OIMP	Odor Impact Minimization Plan
SCAQMD	South Coast Air Quality Management District
TAC	Technical Advisory Committee

Introduction

This Final *2019 Annual Compliance Report for Chiquita Canyon Landfill* has been prepared consistent with Chiquita Canyon Landfill (CCL) Conditional Use Permit (CUP) No. 2004-00042, Condition No. 18, and Implementation and Monitoring Program (IMP) Part XII.

Condition No. 18 requires CCL to “submit annual mitigation monitoring reports to the Department of Regional Planning for approval” as a means of ensuring the effectiveness of the mitigation measures and IMP measures. Condition No. 18 specifies that the report is due on July 1 of each year, with a draft due no later than March 30. IMP Part XII requires CCL to “prepare and submit annual monitoring reports to the Commission and Technical Advisory Committee and to the CAC [Community Advisory Committee],” with a draft due at last 90 days prior to that date.

Because of the inconsistencies presented by the requirements of Condition No. 18 and IMP Part XII, on October 25, 2017, the Los Angeles County Department of Regional Planning (LADRP) directed CCL to prepare a single combined annual compliance report that would address the compliance status of the CUP, IMP, and Mitigation Monitoring and Reporting Program (MMRP). The draft report is due on March 30 of each year, with a final report due July 1.

Report Content

This report includes the information required by IMP Part XII, subpart B, Sections 1 through 14. This 2019 Annual Compliance Report addresses the period from January 1, 2019, through December 31, 2019.

The following appendixes provide information required in IMP Part XII:

- Appendix A – Fill Sequence Plan
- Appendix B – Waste Disposal Plan
- Appendix C – Complaint Log
- Appendix D – Archaeological and Paleontological Reports
- Appendix E – Compliance Status Summary Tables
- Appendix F – Load Inspection Summary Report
- Appendix G – Condition No. 61 Annual Monitoring Report
- Appendix H – Documentation of CARB Compliance
- Appendix I – Condition No. 72 Compliance Evaluation for Alternative Fuel Vehicles and Equipment
- Appendix J – Litter Inspections Log
- Appendix K – Condition No. 108 Annual Waste Origin Report
- Appendix L – Comments and Responses on the Draft 2019 Annual Compliance Report

Review and Comment

IMP Part XII, subpart A requires the draft report to be submitted to the following entities for review and comment:

- Department of Public Health
- Director of the Department of Regional Planning
- Director of the Department of Public Works
- Los Angeles County Forester and Fire Warden
- Regional Water Quality Control Board – Los Angeles Region
- South Coast Air Quality Management District (SCAQMD)

INTRODUCTION

- County Museum of Natural History
- Community Advisory Committee (not yet established by the Los Angeles County Board of Supervisors 5th District)

CCL requested that each of the above-identified entities provide consolidated comments within 30 days of receipt of the enclosed Draft 2019 Annual Compliance Report. Comments received later than 60 days after receipt of the Draft 2019 Annual Compliance Report were not considered in the Final 2019 Annual Compliance Report.

Comments were received from the Los Angeles County Department of Public Works (LACDPW) and LADRP. Comment letters from these two departments, with a table showing how each comment has been responded to in this Final 2019 Annual Compliance Report, are included in Appendix L.

As a result of the COVID-19 outbreak, the Technical Advisory Committee meeting that is typically scheduled prior to the July 1 final report deadline was delayed until July 1, 2020, and LADRP requested that CCL finalize the final report on or around August 1, 2020.

Solid Waste and Beneficial Use Materials

Required content
from IMP Part XII

A cumulative total of all Solid Waste disposed of, and Beneficial Use Materials received at the Landfill, the percent of total available capacity used, the remaining disposal capacity in volume and in tons, and a detailed site map/plan showing the sequence of Landfill operations.

Table 1 provides a summary of material received at CCL during the 2019 Reporting Period.

Table 1. Summary of Material Received During the 2019 Reporting Period
2019 Annual Compliance Report for Chiquita Canyon Landfill

Time Period	Tons		
	Municipal Solid Waste	Beneficial Use Material ^{a,b}	Total Material Received
January 2019	136,202.21	46,084.03	182,286.24
February 2019	119,657.32	37,033.47	156,690.79
March 2019	137,768.28	61,267.17	199,035.45
April 2019	133,829.69	61,265.91	195,095.60
May 2019	130,767.74	58,906.22	189,673.96
June 2019	145,961.13	61,259.66	207,220.79
July 2019	141,443.66	61,276.51	202,720.17
August 2019	166,701.52	61,296.29	227,997.81
September 2019	152,552.84	61,282.29	213,835.13
October 2019	150,113.44	55,444.53	205,557.97
November 2019	130,862.69	61,275.09	192,137.78
December 2019	150,187.24	58,626.68	208,813.92
2019 Reporting Period Total	1,696,047.76	685,017.85	2,381,065.61

^a Includes concrete, asphalt, processed construction and demolition material, processed green waste, contaminated soil, and clean soil diverted to beneficial use on the landfill. Also includes material used for daily cover.

^b CalRecycle's regulations preclude clean and contaminated soil from qualifying as beneficial reuse material. Clean soil is included in this category only because CCL's CUP includes clean dirt in its definition of Beneficial Use Materials.

Table 2 provides a cumulative total of material placed within the waste footprint during the 2019 Reporting Period, including the percent of total available disposal capacity used, remaining available disposal capacity in tons, and remaining available disposal capacity in volume.

Table 2. Cumulative Totals of Waste Disposed
2019 Annual Compliance Report for Chiquita Canyon Landfill

60,000,000 Tons Permitted to be Placed Under CUP 2004-00042 (Available Disposal Capacity)		
Period	Total Material Received	Percent of Total Available Disposal Capacity Consumed
Previous Reporting Periods	3,135,758.96 tons	5.22 ^a
Current Reporting Period	2,381,065.61 tons	3.97 ^b

Table 2. Cumulative Totals of Waste Disposed
2019 Annual Compliance Report for Chiquita Canyon Landfill

60,000,000 Tons Permitted to be Placed Under CUP 2004-00042 (Available Disposal Capacity)		
Period	Total Material Received	Percent of Total Available Disposal Capacity Consumed
Total	5,516,824.57 tons	9.19 ^c
Remaining Available Disposal Capacity	54,483,175.43 tons	Not Applicable
Remaining Available Disposal Volume ^{d,e}	51,399,222.10 cubic yards	Not Applicable

^a Calculated by dividing tons of Material Received for the Previous Reporting Periods by the total available disposal capacity under CUP 2004-00042 (60,000,000 tons).

^b Calculated by dividing tons of Material Received for the Current Reporting Period by the total available disposal capacity under CUP 2004-00042 (60,000,000 tons).

^c Calculated by dividing cumulative tons of Material Received (Previous Reporting Periods plus Current Reporting Period) by the total available disposal capacity under CUP 2004-00042 (60,000,000 tons).

^d Remaining available disposal volume is calculated by dividing remaining available disposal tonnage by 1.06. 1.06 represents the average weight to volume ratio (density) for waste placed during the last 5 years.

^e CUP 2004-00042 does not include a limit on the volume of material (number of cubic yards) that can be placed within the permitted airspace.

Appendix A provides a detailed site map showing the sequence of landfill operations. During the 2019 Reporting Period, waste was placed in areas of the landfill developed under CCL's previous CUP. Cell 6 will be the first area developed to place waste under CUP 2004-00042, anticipated to begin in the 2nd quarter of 2020.

Waste Disposal Plan

Required content
from IMP Part XII

A copy (which may be reduced and simplified to fit the report format) of the most recent approved Landfill survey (as required in Part I of this IMP) showing the limits of the Fill, current elevations, and the height and extent of the current fill.

A copy of the 2019 Waste Disposal Plan, based on the January 13, 2020, aerial landfill survey, showing the limits of fill, current elevations, and the height and extent of current fill, is provided in Appendix B. The 2019 Waste Disposal Plan incorporates the limits of fill, current elevations, and the height and extent of fill based on the January 13, 2020 aerial survey. Additionally, a copy of the January 13, 2020 aerial landfill survey was provided to Los Angeles County for review on July 1, 2020, and CCL provided supplemental clarifying information to LACDPW on July 23, 2020.

Weight to Volume Ratio

Required content
from IMP Part XII

The achieved ratio of weight to volume of Solid Waste disposed of at the Landfill and a comparison of that ratio with the ratio achieved at comparable landfills in the County, with an explanation of any significant deviation.

A determination of the achieved ratio of weight to volume of Solid Waste disposed of at CCL is accomplished by comparing the airspace consumed between two set dates and the quantity of waste placed in the footprint during the same period. In previous years, CCL conducted aerial surveys of the landfill annually, typically in mid-March or early April, when visibility is reliably good.

IMP Part I requires CCL to conduct a survey of the landfill's elevations not less than 60 or more than 90 days before the deadline for the annual monitoring report. With a July 1 deadline, this survey would be required to occur between approximately April 1 and May 1. However, to accommodate a request by LACDPW that the information resulting from the aerial survey be available for the draft version of the Annual Compliance Report, CCL conducted the aerial survey on January 13, 2020. As a result, information regarding material placed in the landfill for the 2019 compliance period is obtained from two different aerial surveys: one conducted on January 20, 2019, and the second conducted on January 13, 2020.

The airspace consumed between these aerial surveys (a known quantity), plus material placed in the landfill footprint during the same period (also a known quantity), is then used to calculate the ratio of weight to volume. Table 3 provides a summary of the achieved ratio of weight to volume of Material Placed within the Waste Footprint for the period between January 21, 2019, and January 13, 2020. The ratio of weight to volume is calculated for all material placed in the waste footprint, regardless of material type – solid waste or beneficial use material.

Table 3. Ratio of Weight to Volume for Material Placed Within the Waste Footprint
2019 Annual Compliance Report for Chiquita Canyon Landfill

Aerial Survey Period	Airspace Consumed ^a	Tonnage ^b	Capacity Utilization ^c
	Cubic Yards	Tons	Tons per Cubic Yard
January 21, 2019–January 13, 2020	2,360,381	2,376,127	1.00
March 13, 2018–January 20, 2019	1,960,142	1,942,318	.99
March 11, 2017–March 12, 2018	2,281,637	2,346,061	1.03
April 3, 2016–March 10, 2017	2,281,506	2,821,378	1.24
March 17, 2015–April 3, 2016	2,093,075	2,131,720	1.02
Average 2015 — 2019			1.06 ^d

^a Airspace Consumed is calculated from the previous aerial survey date to the current aerial survey date.

^b Tonnage is the number of tons of material placed within the waste footprint for the period between aerial survey dates.

^c Capacity Utilization is calculated by dividing tons of material by cubic yards of airspace consumed.

^d Average capacity utilization for the last 5 years is 1.06 tons per cubic yard.

Table 4 summarizes the density of solid waste disposed at comparable landfills in the county.

Table 4. Landfill Density Comparison

2019 Annual Compliance Report for Chiquita Canyon Landfill

Landfill	Disposal Rate	Landfill Density
	Tons per Day	Tons per Cubic Yard
Antelope Valley	1,677	0.75
Lancaster	376	0.75
Scholl Canyon	929	0.593
Sunshine Canyon	7,012	0.88

Source: LACDPW, 2019

The density achieved at CCL has been historically higher than the density achieved at comparable landfills in the County. This is likely due to the quantity of beneficial use materials used at CCL. Densities achieved at CCL are likely to decrease in the future due to CUP limitations on the quantity of beneficial use materials that can be received at CCL.

Beneficial Use Material Rates

Required content
from IMP Part XII

A summary table of the rates (quantity per month and per calendar year) of materials received, disposed of, used for Beneficial Use Materials at the Facility, and/or otherwise diverted and/or sent off-site for further handling/processing, for the period established by the Director of Public Works, or from the last monitoring report, in sufficient detail to explain significant changes and variations of the rates over time.

Table 5 shows the quantity per month, and for the 2019 Reporting Period, of materials defined by the LACDPW as Beneficial Use Materials.

Table 5. Beneficial Use Materials Received at CCL During the Reporting Period
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Month	Fines (Pipe Protection and Protective Cover)	Rubble, Concrete, Asphalt, Road (Road Base and Erosion Control)	Contaminated Soil (Various Uses)	Clean Soil ^a (Various Uses)
	Tons			
January 2019	13,384.32	3,082.18	23,972.63	5,644.90
February 2019	13,403.87	2,488.84	18,059.57	3,081.19
March 2019	18,504.28	3,492.53	25,363.93	13,906.43
April 2019	19,206.15	2,948.79	28,666.10	10,444.87
May 2019	18,873.64	920.69	38,794.50	317.39
June 2019	17,035.07	24.80	40,401.64	3,798.15
July 2019	18,296.32	2,322.41	39,971.57	686.21
August 2019	20,619.35	0.00	39,530.12	1,146.82
September 2019	18,460.54	2.01	42,111.02	708.72
October 2019	19,617.59	0.00	33,838.99	1,987.95
November 2019	15,563.77	0.00	44,515.44	1,195.88
December 2019	14,541.34	17.98	43,112.29	955.07
2019 Reporting Period	207,506.24	15,300.230	418,337.8	43,873.58

^a CalRecycle's regulations preclude clean and contaminated soil from qualifying as beneficial reuse material. Clean soil is included in this category only because CCL's CUP includes clean dirt in its definition of Beneficial Use Materials.

Additionally, as described further in the CCL Program to Assist the County's Diversion Efforts, prepared consistent with CUP Condition No. 46, CCL recycles white goods, e-waste, mattresses, and metals as feasible from the waste stream at CCL. CCL stores these materials in movable containers for 3rd party recyclers to pick up.

During the 2019 Reporting Period, CCL removed the following recyclable materials for offsite processing:

- Approximately 550 mattresses
- Approximately 22,172 tons of steel
- Approximately 13,160 tons of white goods
- Approximately 768 pounds of batteries

Diversion Efforts

Required content
from IMP Part XII

A summary of the measures taken by the Permittee to divert and recycle materials at the Facility, how the measures compare with waste management plans adopted by the County and various cities, and the overall effectiveness of such measures in achieving the intent of the Grant and the County's waste management plans.

CCL prepared a Program to Assist the County's Diversion Efforts for LACDPW review and approval, consistent with CUP Condition No. 46, which was approved by LACDPW on February 20, 2018. Elements of the program include the following:

- Utilize alternative daily cover at CCL, to the extent permitted by appropriate regulatory agencies, including according to the terms of CUP 2004-00042
- Sort and separate commingled recyclables for pickup by a third-party recycler
- Recover and recycle construction and demolition debris for use onsite
- Stockpile and grind concrete/asphalt for use onsite
- Utilize shredded green and wood waste for erosion control
- Divert contaminated soil for daily cover
- Implement a Recycling Public Awareness and Education Program
- Provide a public drop-off area within the relocated entrance for recyclable materials

The above measures are consistent with waste management plans adopted by Los Angeles County, including the county's 2014 *Roadmap to a Sustainable Waste Management Future*, and subsequent Annual Reports, prepared by LACDPW. In particular, CCL's Program to Assist the County's Diversion Efforts includes measures to reduce the disposal of organics and construction and demolition debris in the landfill, which represented 35.8 and 24.4 percent, respectively, of the 2014 Los Angeles County waste stream, as reported in the Roadmap (LACDPW, 2014).

Complaint Summary

Required content
from IMP Part XII

A summary of the number and character of litter, noise, fugitive dust, and odor complaints received in the reporting period, the disposition of such complaints, and any new or additional measures taken to address or avoid future complaints.

Table 6 provides a summary of the number of litter, noise, fugitive dust, and odor complaints received by CCL during the 2019 Reporting Period.

Table 6. Summary of Litter, Noise, Fugitive Dust, and Odor Complaints
2019 Annual Compliance Report for Chiquita Canyon Landfill

Month	Litter Complaints	Noise Complaints	Fugitive Dust Complaints	Odor Complaints
January 2019	0	0	0	0
February 2019	0	0	0	0
March 2019	0	0	0	0
April 2019	0	0	0	1
May 2019	0	0	0	0
June 2019	0	0	0	0
July 2019	0	0	0	2
August 2019	0	0	0	0
September 2019	0	0	0	6
October 2019	0	0	0	1
November 2019	0	0	0	0
December 2019	0	0	0	0
2019 Reporting Period	0	0	0	10

As shown in Table 6, CCL received no complaints during the 2019 Reporting Period for litter, noise, or fugitive dust.

CCL received a total of ten complaints regarding odor during the 2019 Reporting Period. Table 7 provides a summary of these odor complaints, including disposition of the complaint. For many of the odor complaints, the odors were transient and fleeting, and had dissipated by the time CCL staff could visit the location of the complaint or shortly after arrival to the location of the complaint, even when CCL staff were able to conduct an odor survey within 15 to 30 minutes of the complaint.

Table 7. Odor Complaints, Odor Survey, and Disposition of Complaints
2019 Annual Compliance Report for Chiquita Canyon Landfill

Date of Complaint	Time of Complaint	CCL Odor Survey	CCL Action/Follow-Up
April 17	9:31 a.m.	CCL staff visited the complaint location at 9:40 a.m. on April 17. No landfill-related odor was detected.	None needed.
July 2	8:43 p.m.	CCL staff visited the complaint location at 8:51 a.m. on July 2. No landfill-related odor was detected.	None needed.

Table 7. Odor Complaints, Odor Survey, and Disposition of Complaints
2019 Annual Compliance Report for Chiquita Canyon Landfill

Date of Complaint	Time of Complaint	CCL Odor Survey	CCL Action/Follow-Up
July 31	8:37 a.m.	No complaint was received by CCL; however, SCAQMD informed CCL that they had received an odor complaint. CCL staff visited the complaint location at 8:40 a.m. on July 31. A faint landfill-related odor was detected before dissipating shortly after.	Extended odor survey throughout the neighborhood; verified operation of perimeter fans and mister system upon return to site.
September 4	8:14 a.m.	No complaint was received by CCL; however, SCAQMD informed CCL that they had received six odor complaints. SCAQMD visited the complaint locations and confirmed five of the six complaints relating to the landfill.	See discussion in Section 7.
September 5	10:03 a.m.	CCL staff visited the complaint location at 10:15 a.m. on September 5. A faint landfill-related odor was detected before dissipating shortly after.	Extended odor survey throughout the neighborhood; verified operation of perimeter fans and mister system upon return to site.
September 6	Unknown	No complaint was received by CCL; however, SCAQMD informed CCL that they had received multiple odor complaints. SCAQMD visited the complaint locations and confirmed nine complaints relating to the landfill.	See discussion in Section 7.
September 7	7:00 am	No complaint was received by CCL; however, SCAQMD informed CCL that they had received ten odor complaints. SCAQMD visited the complaint locations and confirmed seven to eight complaints relating to the landfill.	See discussion in Section 7.
September 8	8:15 p.m.	No complaint was received by CCL; however, SCAQMD informed CCL that they had received four odor complaints. SCAQMD visited the complaint locations and confirmed two complaints relating to the landfill.	Complaint information was received by CCL after the date of the complaint, so no odor survey could be conducted.
September 12	Unknown	No complaint was received by CCL; however, SCAQMD informed CCL that they had received five odor complaints. SCAQMD visited the complaint locations and confirmed four complaints relating to the landfill.	Complaint information was received by CCL after the time of the complaint, so no odor survey could be conducted.
October 7	8:53 a.m.	CCL staff visited the complaint location at 9:00 a.m.. A faint landfill-related odor was detected while traveling to the complaint location before dissipating upon arrival.	Extended odor survey throughout the neighborhood; verified operation of perimeter fans and mister system upon return to site.

CCL's complaint log for the reporting period is included in Appendix C. Complaint logs are also posted quarterly on CCL's website: www.ChiquitaCanyon.com.

Citation and Notices of Violation Summary

Required content
from IMP Part XII

A detailed accounting of any and all citations, notices of violation, or equivalent the Facility received from any regulatory agency for violations in operating the Facility (including violations related to litter, odor, fugitive dust, noise, Landfill gas, or other Environmental Protection and Control Systems), the disposition of the citations, and the penalties assessed and fees paid.

During the 2019 Reporting Period, CCL received three Notices of Violation (NOV) from SCAQMD regarding air quality issues (odor) and six NOV's from the Los Angeles County Department of Public Health, acting as the Local Enforcement Agency (LEA) for exceeding methane concentrations at a single landfill gas (LFG) probe, as described below.

7.1 SCAQMD NOV's – Explanation and Corrective Actions

September 4, 2019: This NOV was issued after a SCAQMD inspector verified five complaints of trash odor, despite SCAQMD previously having stated that their policy is to issue an NOV after receiving six verified complaints.

September 6, 2019: This NOV was issued after a SCAQMD inspector verified nine complaints of trash odor.

September 7, 2019: This NOV was issued after a SCAQMD inspector verified seven or eight complaints of trash odor.

Corrective actions taken by CCL for the above trash odor-related NOV's are the same for all three NOV's, as follows:

- Restarted using deodorizer in the perimeter misting system, which had previously been discontinued after a resident mentioned she could “taste” the deodorizer.
- Applied deodorizer to the working area and surrounding roads via water truck.
- Reduced the working face size to reduce trash odors.
- Reviewed with staff the requirements of the Odor Impact Minimization Plan for site operation and the Odorous Load Training Program.
- Began operating misters and fans at 4:00 a.m. instead of 5:00 a.m.

In the month after the NOV's were received, the working face moved closer to the nearest community, but no additional complaints were received, indicating that the above corrective actions were effective at eliminating offsite trash odors.

7.2 LEA NOV's – Explanation and Corrective Action

On May 21, 2019, the monthly LEA inspection found that the concentration of methane gas at GP-13, at 58 feet, was 16.5 percent by volume. CCL was directed to take all necessary measures to ensure this probe is brought to compliance, which is a concentration of methane gas that does not exceed 5 percent by volume. CCL was also directed to follow the instructions specified in Title 27 Section 20937 and submit a letter to LEA within 7 days.

CCL worked diligently and in coordination with LEA to implement corrective actions to reduce the methane concentration at GP-13. Corrective actions included modifying and expanding the existing LFG collection system. By October 2019, CCL had achieved full compliance with GP-13. Despite the non-compliance being associated with a single methane gas probe, LEA issued an NOV for each month that the probe was out of compliance, resulting in a total of six NOV's.

Landfill Revegetation

Required content
from IMP Part XII

A report on all interim and final fill revegetation, including an assessment of the success of such revegetation and any additional measures necessary or proposed to effect successful revegetation.

During the 2019 Reporting Period, there were no areas of the landfill that required interim or final fill revegetation. See Appendix E for the compliance status of the mitigation measures contained in the MMRP, including those that address revegetation.

Archaeological and Paleontological Reports

Required content
from IMP Part XII

The archaeological and paleontological reports required in Part IX.

During the 2019 Reporting Period, construction associated with Cell 6 required the preparation of archaeological and paleontological reports. See Appendix D for the archaeological and paleontological reports applicable to the 2019 Reporting Period.

Archaeological and Native American monitoring was conducted by qualified personnel during ground disturbing activities at appropriate locations. No archaeological or Native American resources were observed or collected during the 2019 Reporting Period.

Paleontological monitoring was conducted by qualified personnel during ground disturbing activities at appropriate locations. No paleontological resources were observed or collected during the 2019 Reporting Period.

Alternative Technologies

Required content
from IMP Part XII

A summary of the measures taken by the Permittee to promote and implement alternative technologies most appropriate for Southern California from an environmental and economic perspective, as required by Condition No. 119 and 126 of the Grant.

CCL's parent company, Waste Connections, Inc., has partnered with Hitachi Zosen Inova AG, based in Zurich, Switzerland, to develop a 33,000-ton-per-year dry anaerobic digestion plant at a Waste Connections, Inc. facility in San Luis Obispo, California. The technology being used is known as Kompogas. The Kompogas facility is anticipated to produce 2,907,000 cubic meters of biogas each year, which will power a gas engine and generate electricity for up to 600 homes. The technology, conducted in a fully-enclosed facility, also produces a compost residue.

Waste Connections, Inc. is hosting the Kompogas facility and has committed green waste and food waste to the operation. The Waste Connections, Inc. facility in San Luis Obispo is the first U.S. facility using this particular technology. If proven successful, this technology could be replicated in other areas, including Southern California. The Kompogas Plant opened on November 15, 2018.

Waste Connections, Inc. also has a development agreement with Fulcrum BioEnergy to provide secured access to municipal solid waste (MSW) in 15 geographic areas across North America. Most recently, Waste Connections, Inc. entered into a 20-year MSW feedstock agreement to be the primary supplier of feedstock for Fulcrum BioEnergy's Sierra Biorefinery east of Reno, Nevada. Once completed, the Sierra Biorefinery is expected to process approximately 175,000 tons of MSW annually, creating 10.5 million gallons per year of renewable synthetic crude oil that will be further processed into transportation fuel. The Biorefinery is currently under construction and is expected to begin operation in 2020.

On July 27, 2018, CCL submitted a Proposal for Conversion Technology Facility at Chiquita Canyon Landfill for review and approval by LACDPW in consultation with the Director of Regional Planning. LACDPW provided comments on the proposal on October 4, 2018; after discussions between CCL and LACDPW, CCL resubmitted a revised proposal on February 8, 2019. On November 7, 2019, LACDPW provided comments on the February 8, 2019 proposal, where they clearly stated that they do not consider anaerobic digestion to be an allowable conversion technology at Chiquita Canyon Landfill. CCL is currently evaluating available options for implementing alternative technologies at the Facility.

Condition No. 119 directs CCL to contribute \$200,000 annually, for the first 15 years under CUP 2004-00042, to an alternative technology development fund. This fund is to be used to research, promote, and develop the alternative technologies that are most appropriate for Southern California from an environmental and economic perspective. Payment to this alternative technology development fund was made by CCL, per the terms of Condition No. 119. This condition is currently being challenged in a lawsuit filed by CCL on October 20, 2017, in the California Superior Court, Los Angeles County, styled Chiquita Canyon, LLC v. Los Angeles County, et al., Case No. BS171262.

Condition No. 126 does not directly or indirectly address the promotion or implementation of alternative technologies to waste disposal. This condition is currently being challenged in a lawsuit filed by CCL on October 20, 2017, in the California Superior Court, Los Angeles County, styled Chiquita Canyon, LLC v. Los Angeles County, et al., Case No. BS171262.

Additionally, one half of the payments that CCL is directed to make under Condition No. 117 are deposited into an Alternative-to-Landfilling Technology Account, created and maintained by the Department of Public Works to fund research and activities that promote the development of Conversion Technology facilities that benefit the County. This condition is currently being challenged in a lawsuit filed by CCL on October 20, 2017, in the California Superior Court, Los Angeles County, styled Chiquita Canyon, LLC v. Los Angeles County, et al., Case No. BS171262.

Transportation Improvements

Required content
from IMP Part XII

A summary of the measures taken by the Permittee to maintain roads and to develop transportation improvements in the surrounding areas of the Facility, as required by Condition No. 79 and 121 of the Grant.

Measures taken by CCL during the 2019 Reporting Period to develop transportation improvements surrounding the Facility include the following:

- In February and March, CCL provided LACDPW with updated schedules for onsite (relocated entrance) improvements and offsite (Wolcott Way, Franklin Parkway, and State Route 126) street improvements.
- In May, CCL submitted the proposed CCL-DPW-Caltrans Implementation Agreement to the California Department of Transportation (Caltrans) and coordinated with Caltrans regarding the proposed Implementation Agreement. The intent of the agreement is to identify those street improvements required of CCL under Condition Nos. 77 and 79.
- In October, CCL submitted an updated proposed CCL-DPW-Caltrans Implementation Agreement.

The intent of the proposed CCL-DPW-Caltrans Implementation Agreement is to identify those street improvements required of CCL under Condition Nos. 77 and 79.

Traffic Minimization

Required content
from IMP Part XII

A summary of the measures taken by the Permittee to minimize truck traffic at the Facility as required by Condition Nos. 47, 75-81 of the Grant.

CCL submitted an Unnecessary Truck Trip and Queuing Minimization Plan to LACDPW for review and approval on October 12, 2017, and again on December 14, 2017, in response to comments.

On March 5, 2018, LACDPW provided additional comments, to which CCL requested clarification on March 23, 2018. CCL coordinated with LACDPW in 2019 on revisions to the Unnecessary Truck Trip and Queuing Minimization Plan, which was resubmitted to LACDPW on July 10, 2019, and again on September 17, 2019. CCL is implementing the Unnecessary Truck Trip and Queuing Minimization Plan pending LACDPW approval.

The plan was prepared consistent with CUP Condition No. 47 and 75-81 and addresses CCL's queuing minimization approach at both the current and future landfill entrance. The plan also addresses additional strategies for minimizing truck trips, including scheduling regular facility users, reserving landfill capacity for small users, and discouraging customers from delivering loads of less than one ton.

Odor Control and Mitigation

Required content
from IMP Part XII

A summary of the measures taken by the Permittee to control and mitigate odor nuisance generated by the Facility, including measures taken to mitigate odor generated from incoming waste hauling trucks/customers, working face areas, and landfill gas.

Odor Reduction Measure 1 included in the MMRP requires CCL to prepare an Odor Impact Minimization Plan (OIMP) for landfill operation. The OIMP is required to be prepared for approval by LACDPW, LADRP, SCAQMD, and Lead Enforcement Agency (Department of Public Health). CUP Condition No. 74 also requires the preparation of an OIMP according to the MMRP. The OIMP was submitted for review and approval to LACDPW and LADRP on October 25, 2017, to the Local Enforcement Agency and SCAQMD on November 21, 2017, and to SCAQMD again on November 28, 2017.

Comments on the OIMP were received from LADRP on October 26, 2017, and from LACDPW on October 3, 2018. No comments were received from the Local Enforcement Agency or SCAQMD. CCL submitted a revised OIMP to LADRP and LACDPW on February 1, 2019. The OIMP was approved by LACDPW on March 6, 2019.

The OIMP discusses potential sources of odors, odor control measures for solid waste operations, and an odor complaint response.

Potential sources of odors associated with landfill operation include aerobic (in air) decomposition of organic waste materials before being covered with soil (the exposed waste at the working face), anaerobic (without air) bacterial digestion of buried waste (landfill gas), leachate, and landfill gas condensate.

Odor control measures for solid waste operations include load screening, odorous waste load procedures (including rejecting odorous loads), non-odorous waste load procedures, landfill gas collection, and leachate and landfill gas condensate collection and disposal.

The odor complaint response protocol includes gathering information regarding odor complaints via the CCL hotline, calls made directly to CCL, and feedback from SCAQMD's inspector. Where available, CCL collects the following information regarding the complaint: location; date and time; weather conditions, including wind speed and direction; odor duration; odor characteristics; and odor intensity.

When an odor complaint is received, an odor survey commences as soon as possible during operating hours, but at least within 3 business hours. If the odor is attributable to landfill operation, measures to address the odor are implemented. For example, following a series of odor complaints in September 2019 that resulted in three NOVs from SCAQMD, CCL implemented a series of odor management strategies (see Section 7 of this 2019 Annual Compliance Report), and only one odor complaint and no subsequent NOVs have been received since the month the NOVs were received.

Landfill Gas Collection and Management

Required content
from IMP Part XII

A summary of the measures taken by the Permittee to ensure effectiveness and adequacy of its Landfill gas collection and management system, and to utilize Landfill gas to generate energy at the Facility as required by Condition No. 64 of the Grant.

CCL has extensive LFG collection systems designed and operated in compliance with SCAQMD Rule 1150.1 requirements for control of LFG emissions, U.S. Environmental Protection Agency New Source Performance Standards/Emission Guidelines, and Landfill Methane Capture regulations. These LFG collection systems minimize the pressure gradients that could result in gas migration through the cover soil and underlying soils.

During the 2019 Reporting Period, CCL installed 13,517 linear feet of horizontal collectors and 2,080 feet of header/lateral piping for a total of 16,678 feet of additional LFG collection and control systems (GCCS).

In accordance with SCAQMD Rules and U.S. Environmental Protection Agency regulations, CCL has a site-specific Rule 1150.1 Compliance Plan, and has a Title V permit issued by SCAQMD. The Rule 1150.1 Compliance Plan requires CCL to evaluate the performance of the GCCS by monitoring monthly for the emission or migration of LFG from the landfill. Other parts of the Title V permit place performance standards and testing requirements on the LFG flare. LFG sampling is also required to evaluate the quality and components of the LFG being generated.

All landfill areas are monitored regularly to detect onsite LFG surface emissions or subsurface migration of LFG. The Chiquita Canyon Landfill Rule 1150.1 Quarterly Monitoring Reports for 2019 are posted on CCL's website at www.chiquitacanyon.com/environmental-safety/landfill-reports/.

CCL has an existing 9.2-megawatt LFG to energy (LFGTE) plant operated by Ameresco Chiquita Energy LLC and permitted by Los Angeles County. The LFGTE plant uses LFG extracted from the landfill's existing LFG collection system and converts it into energy using LFG-fueled gas turbines. Energy from the LFGTE plant, enough to power approximately 10,000 homes per year, is delivered to the local electrical grid. The LFGTE plant is centrally located on the site, in the vicinity of the existing LFG flare and blower.

Landfill gas generated at CCL is directed first to the LFGTE plant; excess gas beyond that needed for the LFGTE plant is combusted in an LFG flare.

Compliance Status Summary

Required content
from IMP Part XII

A summary table of compliance status showing the status of compliance of each condition of approval, this IMP and MMRP. The table shall be in a format specified by the Director of Public Works in consultation with the TAC.

Appendix E includes summary tables of compliance status:

- Table E1 is a summary table of compliance with the conditions of approval for CUP No. 2004-00042 and Oak Tree Permit No. 2015-00007.
- Table E2 is a summary table of compliance with the IMP associated with CUP No. 2004-00042.
- Table E3 is a summary table of compliance with additional conditions of approval included with CUP No. 2004-00042.
- Table E4 is a summary table of compliance with the MMRP.

References

Los Angeles County Department of Public Works (LACDPW). 2014. *Roadmap to a Sustainable Waste Management Future*.

Los Angeles County Department of Public Works (LACDPW). 2019. *County of Los Angeles, Countywide Integrated Waste Management Plan, 2018 Annual Report*.

Appendix A

Fill Sequence Plan

Appendix B
Waste Disposal Plan

Appendix C Complaint Log

Appendix D
Archaeological and Paleontological
Reports

Appendix E
Compliance Status Summary Tables

Appendix F
Load Inspection Summary Report

Appendix G
Condition No. 61
Annual Monitoring Report

Appendix H
Documentation of CARB Compliance

Appendix I
Condition No. 72 Compliance
Evaluation for Alternative Fuel
Vehicles and Equipment

Appendix J
Litter Inspections Log

Appendix K
Condition No. 108
Annual Waste Origin Report

Appendix L
Comments and Responses on the
Draft 2019 Annual Compliance Report