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April 1, 2010

Mr. Michael B. Wochnick  
P.E., Supervisor  
CalRecycle  
Closure and Technical Support  
801 K Street, MS 19-01  
Sacramento, CA 95814

**LOPEZ CANYON LANDFILL, CITY OF LOS ANGELES, FACILITY NO. 19-AA-0820 - PUBLIC COMPLAINT REGARDING POSTCLOSURE LAND USE**

Dear Mr. Wochnick,

We have received your letter dated March 16, 2010 in which you listed several statements related to the current status of Lopez Canyon Landfill (LCLF). We have reviewed these statements and for clarity, they are listed below with our corresponding responses:

- \* **Final Closure and Post Closure Maintenance Plans (plans) were originally approved in 1995. A subsequent modification to the plans (final cover design change) was adopted in 1999 through the approval of revised Volume IV of the plans.**

Response: We do agree with your statement, however, it only constitutes partial summary of the revisions. The following is a detailed summary of all revisions to date:

**Summary of Revisions**

This summary of Revisions outlines the amendments to the FCP and the FPCMP for the LCSL. The FCP is comprised of the Partial Closure Plan (PCP) (Volumes I through III) dated April 1993 and the Amendment to the PCP (Volume IV of IV). The initial Amendment (Volume IV of IV), transformed the PCP into the FCP. The FPCMP is comprised of the Partial Post-Closure Maintenance Plan (PPCMP) (Volume I) dated January 1993 and the Amendment to the PPCMP (Volume II of II) dated February 1994. The Amendment (Volume II of II) transformed the PPCMP into the FPCMP.



- Volume IV of IV Replacement Amendment to FCP was submitted in June 1996 (the 1996 FCP) to replace the February 1994 Volume IV of IV in its entirety and thereby amended the FCP and FPCMP (the 1994 FPCMP) for the LCSL. The objective of the first amendment was to incorporate FCP information on the closure of the deck of Disposal Areas "A" and "B" and the deck and slopes of Disposal Areas "AB+" and "C." The 1996 FCP included revisions to the FCP necessitated by changes in the design of the landfill since submission of the 1994 FPCMP. These changes required revisions to the final cover, the final grading plan, post-closure settlement estimates, surface water drainage controls, soil loss analysis, the landfill gas (LFG) control system, landscaping and irrigation, the closure cost estimate, closure implementation schedule, and the final cover construction quality assurance (CQA) plan for the landfill.
- Revision I to Volume IV of IV Replacement Amendment to FCP was submitted in March 1997 (the 1997 report) to address comments from the CIWMB and LEA on the 1996 FCP, prior to final approval of the revised closure plan being granted. Applicable sections of the amended FCP were revised to reflect these comments. Revised sections included the final cover design, LFG control system, the closure cost estimate, a final cover performance evaluation report and the CQA plan.
- Revision II to Volume IV of IV Replacement Amendment to FCP was submitted October 1998 (the 1998 report) and included additional revisions of applicable sections to reflect the conditional approval of the evapotranspirative (ET) cover for the slopes of Disposal Areas "A" and "AB +" and the decks of Disposal Areas "A" and "B." Revised sections include the final cover design, landscaping and irrigation, the closure cost estimate, the closure plan implementation schedule and the CQA plan, with new appendices added to address ET cover water balance analyses and the final cover performance evaluation.
- Revision III to Volume IV of IV Replacement Amendment to FCP was submitted in October 2002 (the 2002 report) to reflect construction of a composting facility on the decks of Disposal Areas "A" and "B" and changes in the final cover in these areas. Revised sections include the final cover of the Decks of Disposal Areas "A" and "B," closure cost estimate, closure plan implementation schedule, the CQA plan, and a new appendix added to address the Asphaltic Cement Concrete final cover configuration proposed for the composting area.
- Revision IV to Volume IV of IV Replacement Amendment, prepared by Geosyntec on behalf of the Bureau of Sanitation (BOS), was submitted in July 2008 (the 2008 report) as an additional revision of applicable sections to be incorporated into the June 1996 report, to reflect the following:

- Revising the design of the final cover for the slopes and deck of Disposal area "C" to use and ET cover instead of the currently proposed (in the June 1996 report) Title 27 prescriptive final cover;
  - Revising the final cover stability evaluation for the Disposal Area "C" per Title 27 of the California Code of Regulations (Title 27) requirements to reflect the proposed ET cover;
  - Updating the final closure cost estimate for the site to include disposal areas that have been closed and to reflect cost saving from the use of the proposed ET cover system for Disposal Area "C"; and
  - Updating the closure schedule to complete closure activities of the remaining waste disposal areas;
  - Development of the Proposed Truck Driver Training Academy.
- \* **LCLF stopped receiving waste in July 1996 with closure activities commencing immediately after that date.**

Response: We agree.

- \* **Although a majority of the landfill has received final cover, closure construction activities have not yet been completed and the landfill is still not closed. Furthermore, no construction quality assurance reports have been received to date for those areas where closure activities have been completed.**

Response: Closure activities are in progress and on schedule to be completed by December 31, 2012. All construction quality assurance reports for those areas where closure activities have been completed were already submitted. Reports for all areas except disposal area AB + slopes and disposal area "C" were submitted. We are not aware that you have not received them. Please let us know which one you are missing and we can forward them to you.

- \* **Even though the landfill has not completed the closure construction, LCLF has implemented several postclosure land uses during the course of a very lengthy construction schedule. CalRecycle staff understands that the land uses include a helicopter landing pad, fire suppression water storage tank, a cogeneration plant, and micro-turbine cogeneration station.**

Response: These land uses were requested and approved through official requests as part of the revised closure plans.

- \* Although the landfill operator applied for and received several final closure construction completion date extensions, the incomplete closure construction project extends well beyond reasonable timeframe (almost 14 years currently.)

Response: Closure activities are currently in progress and on schedule to be completed by December 31, 2012.

Also, attached to this letter are several documents you may find helpful in filling the information gap.

In summary, the City of Los Angeles desires to stress the fact that it continues to adhere to the approved closure plans and schedule which requires construction completion by December 31, 2012. If you have any questions, please call Ms. Rosalia Rojo at (213) 473-4002.

Respectfully,



KHALIL M. GHARIOS, Division Manager  
Solid Resources Processing and Construction Division

KG:ml

Attachments

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