

**North Valley Coalition of Concerned Citizens Inc.,
16911 San Fernando Mission Blvd.,
Box 172
Granada Hills, CA 91344**

January 15, 2015

Dr. Wen Yang,
Chief of Land Disposal Unit
320 W. 4th Street
Suite 200
Los Angeles, CA 90013

Delivered via Email & US Mail

**Re: Public Notice – Revision of Monitoring and Report Program, Sunshine Canyon
Landfill, Sylmar, California (File No: 58-076, Order No: R4-2008-0088, CI-2043,
Geotracker Global No: L 10006014618)**

Dear Sir:

Thank you for the opportunity to comment on the Public Notice dated, December 19, 2014, and the Board's intent to revise the MRP program for Sunshine Canyon Landfill per the Draft Tentative MRP.

As you are well aware, the North Valley Coalition of Concerned Citizens Inc., (NVC) has participated in every RWQCB hearing and commented on every document related to this landfill since 1987, this being no exception.

We have previously submitted, and have attested to the fact during various hearings, that our consultant had indicated that vast amounts of water underlie the landfill. While these waters are not potable, they are never-the-less waters of the State, which you are obligated to protect.

Draft Item 1, down-gradient wells PZ-4, DW-2, and DW-3 reclassified as up-gradient wells.
The reclassifying of these wells to up-gradient wells will impact the frequency as stated in Item 4 which will then permit the up-gradient wells sampling frequency to go from quarterly to annually. These particular wells are of great concern to the community, and are located on the southern edge of the landfill adjacent to the Santa Susanna Fault. They constitute the only method of detecting any contamination should it migrate toward Bee Canyon and the residential area to the south. How does the RWQCB plan to monitor and detect leachate movement to the south in a timely manner? Has the RWQCB taken into account the final build out of the City/County combined landfill, as most of the old City landfill will be overlain by the expansion, which will put additional outward pressure and stress on this poorly explored and documented strata? We recommend that these wells remain as down-gradient wells, and that the sampling frequency remain as quarterly.

Draft, Item 2, the decommissioning of wells CM-15, CM-16R, AND CM17R

We have previously indicated that the abandonment of these interior wells would permit contaminated waters from the County landfill (which was leaking after only 6-years), and would end up being detected “only” after it reached the entrance to the landfill on San Fernando Road and from there potentially contaminating City property. Since the removal of any wells that could have detected and/or intercepted contamination, the possibility of any remediation before the entire canyon is contaminated has been lost. Further, it would become impossible to determine if the City or the County expansion were the cause. We pointed out that by relying on wells at the entrance of the landfill, that the water supply of the San Fernando Valley aquifer (of which Sunshine Canyon is a part) was threatened either by direct contact with contaminated waters that had escaped detection and were leaking into the cracked 25-foot diameter tunnel (to the east of the entrance), and which carries water from the DWP Cascades to their treatment plant, and/or from contaminated surface water from the landfill’s sedimentation basin which in turn discharges water (in times of flood without any testing) to the cracked County flood control channel which also passes above said Cascades tunnel. Additionally, we pointed out that the water from the flood control channel is able to go to ground in an unlined section at the Jensen Filtration Plant. In fact, the RWQCB’s response to our concern was to add MW-5 to the entrance. The question here is when contamination occurs (since EPA says all liners leak) how will the waters of the State then be protected, and how will remediation be accomplished to prevent other parts of the San Fernando Valley aquifer from contamination?

Draft, Item 3 discontinued use of OM-1 and extraction wells ET-1, ET-2, ET-3, EW-1, EW-2, EW-4, and EW-5 for groundwater monitoring

The report states that OM-1 is dangerous because it is on the main haul road, and it is unsafe to perform monitoring operations. It is not clear what function observation well OM-1 serves, and what the sampling frequency is. How is this well impacted by the proposed main haul road realignment, and toe berm scheduled to be constructed? Will it be decommissioned or will it remain available? In regards to wells ET-1 thru ET-3, and EW-1 thru EW-5 it is suggested that one of the wells MW-9 (which lies behind the extraction trench) is suitable for ground water monitoring yet in Item 5 it states that the well will be reduced from quarterly to annually. Is it the intent of RWQCB to reduce the sampling frequency of water levels? DW-1 appears to be located in the Sediment Basin on the other side of the cutoff wall, which would appear to be problematic in not only sampling but if the vaulted cutoff wall (supposed to be to bedrock) and extraction trench and extraction wells do their job how can the groundwater level at this well be accurate? OM-2 another suggest replacement raises the same questions posed for OM-1, i.e. It is not clear what function observation well OM-2 currently serves, and what the sampling frequency is. How is this well impacted by the proposed main haul road realignment, and toe berm scheduled to be constructed? Will it be decommissioned or will it remain available? OM-3 seem to suffer from the same problem as DW-1, i.e. appears to be located in the Sediment Basin on the other side of the cutoff wall, which would appear to be problematic in not only sampling but if the vaulted cutoff wall (supposed to be to bedrock) and extraction trench and extraction wells do their job how can the groundwater level at this well be accurate? Overall it seems to us that the RWQCB should review again and weigh carefully the proposed swap outs in this critical area since it has put all its eggs in one basket so to speak, and that the earlier any changes in water levels or contamination can be detected the better able it will be to prevent or remediate the problem before it can impact waters outside of Sunshine Canyon.

Draft, Item 4 sampling frequency for all up-gradient wells is reduced from quarterly to annually
See comments on impacts response to Draft Item 1.

Draft, Item 5 sampling frequency of shallow “reference” wells MW-2A and MW-9 is reduced from quarterly to annually.

See comments on impact response to Draft Item 3, and we would again caution the reduction of sampling frequencies because “the earlier any changes in water levels or contamination can be detected the better able RWQCB will be to prevent or remediate the problem before it can impact waters outside of Sunshine Canyon”.

Draft, Item 7 confirmative sampling has been revised from “annually” to “as needed”

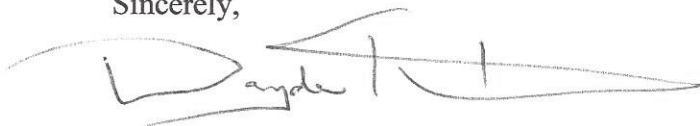
We all understand the need to conserve and to make best use of available resources, however, based on this revision, and unless an error or a laboratory came under suspicion, in say making tests for another landfill, you are not going to check the validity of any samples ever again, nor ensure that the results of samples reflected the proper sampling protocols. For example at one point BFI was sending samples to Redwood City (27 miles south of San Francisco), instead of using local labs. The time it took for these samples to reach that lab it affected the VOCs. We would respectfully suggest that the confirmative sampling be revised to require the “operator” at a minimum to submit split samples annually, and that you should also add the “as needed.”

We further believe that the RWQCB has not fully taken into account the fact that this area is one of the most folded and faulted regions of the Santa Susanna Mountains, and one of the most seismically active areas in all of southern California. Dramatic changes to the hydrogeology can and will occur with unexpected results. The eventual deposition of 115,000,000 tons of trash, of which we know that at least an average of 0.4% of that is toxic or hazardous, is an accident waiting to happen, and it should be incumbent upon you to maintain the highest levels of sampling frequencies possible in order to detect any problems at the earliest time possible.

In closing, we would respectfully ask that you extend the comment period by 30-days as the notice period was over the Christmas, New Year holidays, and Martin Luther King Jr. Day, and we are having to work with 8-1/2 x 11” reduced scale copies of Geo-Logic’s original submission, since the included hotlink in the notice did not work (see below).

http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=L1000601468

Sincerely,

A handwritten signature in black ink, appearing to read "Wayde Hunter". The signature is stylized with a large initial "W" and a long horizontal stroke extending to the right.

Wayde Hunter

President, North Valley Coalition of Concerned Citizens Inc.

c.c Margaret Clark, Vice-Chair Los Angeles County Solid Waste Mgt Committee
Supervisor Mike Antonovich, County Board of Supervisors 5th District
Councilman Mitch Englander, Los Angeles City Council 12th District