



November 7, 2025

Sina Taghvaei, Air Quality Specialist
South Coast Air Quality Management District
21865 Copley Dr.
Diamond Bar, CA 91765

Subject: SCH No. 1992041053 – Draft Subsequent Environmental Impact Report for
Sunshine Canyon Landfill Flare Capacity Expansion Project – Los Angeles
County

Dear Sina Taghvaei:

Thank you for allowing the Department of Resources Recycling and Recovery (CalRecycle) staff to provide comments on the proposed project and for your agency's consideration of these comments as part of the California Environmental Quality Act (CEQA) process.

PROJECT DESCRIPTION

The South Coast Air Quality Management District, acting as Lead Agency, has prepared and circulated a Draft Subsequent Environmental Impact Report (Draft SEIR) in order to comply with CEQA and to provide information to, and solicit consultation with, Responsible Agencies in the approval of the proposed project.

The proposed Sunshine Canyon Landfill Flare Capacity Expansion Project (proposed project) is located at Sunshine Canyon City/County Landfill (Landfill; Solid Waste Information System No. 19-AA-2000) at 14747 San Fernando Road in Sylmar, California. The Landfill is a Class III non-hazardous waste facility. The southeast portion of the Landfill is located within the City of Los Angeles and the northwest portion is located within the unincorporated portion of Los Angeles County.

The proposed project aims to: 1) increase the site-wide Landfill Gas (LFG) combustion flare capacity and permit limit to accommodate the LFG currently being produced and collected and to accommodate the maximum future projected LFG production rate; 2) increase the capacity of the gas collection and control system (GCCS) to accommodate the maximum future projected LFG production rate; and 3) further reduce landfill odors and prevent fugitive releases of methane. No component of the proposed project is expected to expand landfill capacity and footprint or increase the amount of waste that can be accepted.

The proposed project aims will be accomplished by: 1) installing and operating two additional LFG flares and two additional 300-horsepower electric blowers, and connecting them to the GCCS; and 2) increasing the permitted site-wide LFG combustion limit.

COMMENTS

CalRecycle staff's comments on the proposed project are listed below. Where a specific location in the document is noted for the comment, please ensure the comment is addressed throughout all sections of the Draft SEIR, in addition to the specific location noted.

Gas Monitoring and Control Program Plan

Throughout the Draft SEIR it is stated that the GCCS will be updated by adding additional flares and electric blowers. These additions may require updates to the landfill gas monitoring and control plan, as described in [Title 27 California Code of Regulations \(27 CCR \) Section 20921\(b\)](#).

Report of Facility Information Amendment

On page 1-9, section Closure and Decommissioning, it is stated that, "The anticipated SCL closure date, when SCL reaches its landfill waste limit, is 2038." The current Solid Waste Facility Permit (SWFP) and currently approved Joint Technical Document (JTD; May 2024) state that the estimated closure year is 2037. This update, as well as the changes to the gas monitoring and control program plan, may require an update to the JTD via a Report of Facility Information (RFI) Amendment.

Solid Waste Regulatory Oversight

The Los Angeles County Department of Public Health and the City of Los Angeles Department of Building & Safety are both part of the Sunshine Canyon Landfill Local Enforcement Agency (LEA) and are both responsible for providing regulatory oversight of solid waste handling activities, including inspections and permitting. The LEA can assist in determining if the gas monitoring and control program plan and the JTD need to be updated. Please contact Lilit Baghumyan (Los Angeles County LEA) at 626.430.5540 or lbaghumyan@ph.lacounty.gov, and David Thompson (City of Los Angeles LEA) at 213.252.3932 or david.thompson@lacity.org to discuss the regulatory requirements for the proposed project.

CONCLUSION

CalRecycle staff thanks the Lead Agency for the opportunity to review and comment on the environmental document and hopes that this comment letter will be useful to the Lead Agency preparing the Final SEIR and in carrying out their responsibilities in the CEQA process.

CalRecycle staff requests copies of any subsequent environmental documents, copies of public notices and any Notices of Determination for this proposed project.

If the environmental document is adopted during a public hearing, CalRecycle staff requests 10 days advance notice of this hearing. If the document is adopted without a

public hearing, CalRecycle staff requests 10 days advance notification of the date of the adoption and proposed project approval by the decision-making body.

If you have any questions regarding these comments, please contact me at 916.341.6084 or by e-mail at theodore.tasiopoulos@calrecycle.ca.gov.

Sincerely,



Theodore Tasiopoulos, Environmental Scientist
Permitting & Assistance Branch – South Unit
Waste Permitting, Compliance & Mitigation Division
CalRecycle

cc: Ben Escotto, CalRecycle Supervisor
Permitting & Assistance Branch – South Unit

Lilit Baghumyan, Sunshine Canyon Landfill LEA, Los Angeles County

David Thompson, Sunshine Canyon Landfill LEA, City of Los Angeles

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