

**PETITIONER'S EXHIBIT 6**

Case No. 3448 – 18

April 30, 2026

Modification to Stipulated Order for Abatement

1 OFFICE OF THE GENERAL COUNSEL  
2 SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT  
3 KARIN MANWARING, State Bar No. 228565  
4 Senior Deputy District Counsel  
5 21865 Copley Drive  
6 Diamond Bar, California 91765-0940  
7 Telephone: (909) 396-3400  
8 Fax: (909) 396-2825

9 Attorneys for Petitioner  
10 SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

11 **BEFORE THE HEARING BOARD OF THE**  
12 **SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT**

13 **In the Matter of**

14 SOUTH COAST AIR QUALITY  
15 MANAGEMENT DISTRICT,

16 Petitioner,

17 vs.

18 BROWNING-FERRIS INDUSTRIES OF  
19 CALIFORNIA, INC., a California  
20 Corporation dba SUNSHINE CANYON  
21 LANDFILL,

22 [Facility ID No. 49111]

23 Respondent.

Case No. 3448-18

**[PROPOSED] MODIFICATION TO  
STIPULATED ORDER FOR  
ABATEMENT; FINDINGS AND  
DECISION OF THE HEARING BOARD**

Health and Safety Code §41700 and  
District Rule 402

Hearing Date: April 30, 2026

Time: 9:30 a.m.

Place: Hearing Board  
South Coast Air Quality  
Management District  
21865 Copley Drive  
Diamond Bar, CA 91765

Status Hearing: September 3, 2025

Initial Hearing: March 19, 2025

24 **FINDINGS AND DECISION OF THE HEARING BOARD**

25 On April 30, 2026, the Hearing Board convened a hearing to consider modifications to the  
26 Stipulated Order for Abatement, which issued on March 19, 2025, pursuant to notice and in  
27 accordance with the provisions of California Health and Safety Code Section 40823 and District  
28 Rule 812. The following members of the Hearing Board were present: Micah Ali, Chair; Robert

1 Pearman, Esq., Vice-Chair; Dr. Jerry P. Abraham, MD MPH CMQ; Mohan Balagopalan; and  
2 Cynthia Verdugo Peralta. Petitioner, Executive Officer of the South Coast Air Quality Management  
3 District, (hereinafter referred to as "District" or "Petitioner"), was represented by Karin  
4 Manwaring, Senior Deputy District Counsel. Respondent Browning-Ferris Industries of California,  
5 Inc. ("BFI"), a California corporation and wholly-owned subsidiary of Republic Services, Inc., was  
6 represented by the Law Offices of Thomas M. Bruen, P.C. The public was given the opportunity to  
7 testify. The matter was submitted and evidence received. The Hearing Board finds and decides as  
8 follows:

9 **FINDINGS OF FACT**

10 1. Petitioner is a body corporate and politic established and existing pursuant to H&S  
11 Code §40000, *et seq.* and §40400, *et seq.*, and is the sole and exclusive local agency with the  
12 responsibility for comprehensive air pollution control in the South Coast Basin.

13 2. Respondent BFI, doing business as "Sunshine Canyon Landfill," owns and operates  
14 a landfill/solid waste disposal site located at 14747 San Fernando Road, Sylmar, California 91342  
15 (hereinafter referred to as "Sunshine Canyon Landfill" or the "Facility"), SCAQMD Facility ID  
16 #49111, subject to the District's jurisdiction and District Rules.

17 3. The Facility is a Title V facility. The Title V Permit system is the air pollution  
18 control permit system required to implement the federal Operating Permit Program as required by  
19 Title V of the federal Clean Air Act as amended in 1990.

20 4. Sunshine Canyon Landfill operates under a Solid Waste Facility Permit issued by  
21 the California Department of Resources Recycling and Recovery ("CalRecycle"). Sunshine  
22 Canyon Landfill is classified as a Class III landfill and accepts municipal solid waste. The facility  
23 is not permitted to accept hazardous waste. The Solid Waste Facility Permit limit is 12,000 tons  
24 per day and the landfill receives roughly 9,000 tons of waste per day, handling approximately one-  
25 third of the daily waste of all of Los Angeles County.

26 5. In January 2025, the Los Angeles region experienced the most destructive wildfire  
27 episode in the region's known history, destroying thousands of homes, businesses and other public  
28 infrastructure. Respondent's tonnage limits have been temporarily increased following approvals

1 and emergency waivers issued by the Sunshine Canyon Landfill Local Enforcement Agency<sup>1</sup>  
2 (SCL-LEA), the Regional Water Quality Control Board, and the Los Angeles County Board of  
3 Supervisors (LACBOS) to address the removal and disposal of fire debris.<sup>2</sup>

4 6. The municipal solid waste disposed of in Sunshine Canyon Landfill generates  
5 landfill gas as it decomposes. The major components of landfill gas are methane and carbon  
6 dioxide, and other non-methane organic compounds which contains odorous compounds in lesser  
7 concentrations. Landfill gas, unless adequately collected, may escape from the landfill into the  
8 atmosphere. Landfill disposal can also cause fresh trash odors. Liquids (e.g., leachate) emanating  
9 from the surface of the landfill may also cause odors.

10 7. **California H&S Code §41700 and District Rule 402** prohibit the discharge from  
11 any source whatsoever of such quantities of air contaminants or other material which cause injury,  
12 detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which  
13 endanger the comfort, repose, health or safety of any such persons or the public, or which cause,  
14 or have a natural tendency to cause, injury or damage to business or property.

15 8. The District alleges that Respondent is unable to conduct operations at the Facility  
16 without being in violation of H&S Code §41700 and District Rule 402 unless additional mitigation  
17 measures are implemented.

18 9. The District and Respondent disagree as to whether Respondent was, is, or has been  
19 in violation of H&S Code §41700 and District Rule 402.

20 10. **District Rule 806(b) and H&S Code §42451(b)** permit the Hearing Board to issue  
21 a stipulated order for abatement upon the terms and conditions set forth in a stipulated Findings  
22 and Decision without making a finding that Respondent is in violation of a District rule or  
23

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24 <sup>1</sup> An LEA is an entity designated by the governing body of a county or city and is empowered to implement delegated  
California Environmental Protection Agency's Cal Recycle programs and locally designated activities.

25 <sup>2</sup> On January 27, 2025, the SCL-LEA approved an Emergency Waiver (until May 24, 2025) for fire recovery operations  
26 and the RWQCB issued an approval for Disposal of Disaster Related Wastes, consistent with the General Order related  
27 to the disposal of debris resulting from a disaster-related emergencies, as adopted by the State Water Board on February  
28 18, 2020. On February 25, 2025, the LACBOS approved the "Temporary Waiver of Wasteshed Restriction and Increase  
in Disposal Tonnage Limits at Local Landfills" authorizing Respondent to temporarily increase tonnage limits continuing  
for 120 days. As a result, the Facility's tonnage limits are temporarily increased to 15,000 tons per day.

1 regulation.

2 11. As a result of the odors emanating from Sunshine Canyon Landfill, a considerable  
3 number of persons living in the community and elementary school staff and students near the  
4 Facility have experienced nuisance level odors on an ongoing basis.

5 12. Beginning in January 2023 through the present, the District has received over 3800  
6 odor complaints from the public and elementary school staff working and living near Sunshine  
7 Canyon Landfill alleging the Facility as the source of the odor. The District has traced the odors  
8 back to Sunshine Canyon Landfill on numerous occasions.

9 13. In 2022, the District received approximately 650 odor complaints. With the  
10 increasing wet weather extremes, the number of odor complaints has been increasing significantly.  
11 In 2023, the District received over 1,720 odor complaints and in 2024, the District received over  
12 2,100 odor complaints.

13 14. From January 1, 2023, through the present, the District has issued more than 138  
14 Notices of Violation ("NOVs") against the Respondent for violating District Rule 402 and H&S  
15 Code §41700.

16 15. The District recently issued two more public nuisance NOVs after receiving over  
17 numerous odor complaints on February 16<sup>th</sup> and 17<sup>th</sup> following record breaking rains that occurred  
18 in the Los Angeles region on February 13<sup>th</sup> and 14<sup>th</sup> of this year, 2025.

19 16. The City of Los Angeles City Council and the County of Los Angeles Board of  
20 Supervisors designated the SCL-LEA to be the primary local agency that provides the regulatory  
21 permitting, enforcement, and operational compliance oversight at Sunshine Canyon Landfill on  
22 behalf of the California Environmental Protection Agency's Cal Recycle.

23 17. Numerous regulatory agencies, including the South Coast Air Quality Management  
24 District, SCL-LEA, Los Angeles County Regional Planning, City of Los Angeles Planning  
25 Department, City of Los Angeles Bureau of Sanitation, the Los Angeles Regional Water Quality  
26 Control Board, the California Department of Toxics Substances Control, and other state or local  
27 agencies, have jurisdiction over Respondent (and/or Respondent's affiliates', including its transfer  
28 stations).

1 18. Additionally, the U.S. Army Corp of Engineers, in coordination with the State of  
2 California, the County of Los Angeles Department of Public Works (LACDPW), and the Federal  
3 Emergency Management Agency (FEMA), have been working to manage the removal and disposal  
4 of debris related to the January 2025 wildfires that impacted the Los Angeles region.

5 19. On April 9, 2024, the Los Angeles County Board of Supervisors instructed the  
6 Department of Regional Planning (DRP), Department of Public Works, and Department of Public  
7 Health, as part of the Sunshine Canyon Landfill Technical Advisory Committee, to engage an  
8 independent technical expert to provide an assessment of the odor issues that occurred at Sunshine  
9 Canyon Landfill (SCL) between 2023 and 2024. In response, a report titled "Sunshine Canyon  
10 Landfill Assessment of Odor Issues 2023 and 2024" was prepared and released by UltraSystems  
11 Environmental (the "UltraSystems Report") on October 16, 2024.

12 20. The UltraSystems Report includes descriptions of the effectiveness of remediation  
13 actions and recommendations for operations of the landfill to more effectively address the odor  
14 issues.

15 21. The District has worked closely with and is largely relying on recommendations  
16 advanced by the SCL-LEA and/ or identified in the UltraSystems Report for the mitigation  
17 measures to present in a proposed Findings Decision, and Order.

18 22. The mitigation measures to be presented in advance of the hearing are intended to  
19 reflect a systemic approach and will include, among other measures, the utilization of  
20 methanotrophs in the form of pilot projects intended to address changing weather conditions.

21 23. Methanotrophic bacteria (or "methanotrophs") are bacteria and microbes that  
22 oxidize methane and odors. These microbes utilize methane as their primary energy source  
23 (effectively "eating" methane and breaking it down into less harmful compounds) and can also  
24 often co-oxidize various odor molecules due to their metabolic processes involving enzymes like  
25 methane monooxygenase (MMO.)

26 24. A landfill "Lift" is a layer of waste in a landfill cell that is typically 8–10 feet  
27 thick. Landfills are made up of multiple lifts, or layers of cells.

28 25. A landfill "Cell" is a single, waste-holding unit within a larger landfill property.

1           26.     ClosureTurf is a is a patented, landfill closure system that uses a geomembrane,  
2 synthetic turf, and sand infill to protect the landfill from erosion and gas emissions.

3           27.     “EnviroCover” is a proprietary alternative daily cover.

4           28.     “Posi-Shell” is a patented, quick-drying, spray-on intermediate cover made from a  
5 blend of clay binders, reinforcing fibers, and polymers.

6           29.     Phytoremediation is the use of plants to remove, contain, or break down  
7 environmental pollutants. Phytoremediation also refers to turning sterile/dead dirt into highly  
8 productive living soil with greater biological diversity in the soil zone surrounding the plant root  
9 system.

10          30.     Notwithstanding successful mitigation measures implemented in prior years, the  
11 District again alleges that Respondent has been unable to conduct operations at the Sunshine  
12 Canyon Landfill without being in violation of state law and District Rules and Regulations  
13 regarding odor nuisance.

14          31.     A Status Hearing was held before this Board on September 3, 2025, at which time  
15 the parties reported that Respondent continues to operate in compliance with the Order.

16          32.     Notwithstanding operating in compliance with the Order, the District has continued  
17 to receive hundreds of odor complaints and has issued an unprecedented number of violation  
18 notices for violations of District Rule 402.

19          33.     In 2024, the District issued a total of 65 NOVs. In 2025, the District issued a total  
20 of 89 NOVs. In 2026, to date as of this filing, the District issued approximately 43 NOVs.

21          34.     Landfill gas “Pin Wells” are shallow vertical wells used for temporary or immediate  
22 gas extraction to control odors and migrate landfill gas for early-stage waste management before  
23 permanent vertical wells are installed.

24          35.     A “Geosynthetic Clay Liner” (GCL) is a mineral sealing mat comprised mostly of  
25 two geotextiles that are affixed together, encapsulating a layer of sodium bentonite clay between  
26 them, which is known for having consistent, very low permeability.

27          36.     The District understands and believes and therefore alleges that Respondent’s  
28 ability to remain in compliance with District Rule 402 and H&S Code § 41700 is impacted by

1 increasing wet weather conditions related to more commonly occurring extreme precipitation  
2 events experienced in the region and the erosion at the landfill that results from those extreme  
3 weather events.

4 37. It is not unreasonable to require Respondent to comply with State law and District  
5 Rules, including H&S Code §41700 and District Rule 402.

6 **CONCLUSIONS**

7 1. The parties have stipulated to the issuance of this Modification to a Stipulated Order  
8 for Abatement, pursuant to Health and Safety Code Section 42451(b).

9 2. The issuance of a Modification to a Stipulated Order for Abatement upon a fully  
10 noticed hearing would not constitute a taking of property without due process of law.

11 3. The issuance of the prayed for Modification to a Stipulated Order for Abatement is  
12 not expected to result in the closing or elimination of an otherwise lawful business, but if it does  
13 result in such closure or elimination, it would not be without a corresponding benefit in reducing  
14 air contaminants.

15 4. This Modification to a Stipulated Order for Abatement is not intended to be, nor  
16 will it act as, a variance. Respondent is subject to all rules and regulations of the District and to all  
17 applicable provisions of California law. Nothing herein shall be deemed or construed to limit the  
18 authority of the District to issue Notices of Violation, to seek civil penalties or injunctive relief, or  
19 to other administrative or legal relief. The Findings of Fact are based on evidence presented by  
20 Petitioner and Respondent as of the date hereof.

21 **ORDER**

22 THEREFORE, subject to and based on the aforesaid Findings of Fact, Conclusions and  
23 additional evidence and testimony, and good cause appearing, Respondent is hereby ordered to  
24 cease and desist any operation of the landfill/solid waste disposal Facility referred to as "Sunshine  
25 Canyon Landfill," resulting in violations of Health and Safety Code §41700 and District Rule 402,  
26 or in the alternative, comply with the actions and conditions set forth below:

27 1. Respondent shall appear at a Status Hearing to be set in six months, or as soon thereafter  
28 as the South Coast AQMD Hearing Board schedule allows, and shall prepare a written

1 status report to be submitted at least thirty-days in advance of the Status Hearing.  
2 Respondent shall email the status report to the Clerk of the Board at [COB@aqmd.gov](mailto:COB@aqmd.gov), with  
3 a copy to the South Coast AQMD [attention Karin Manwaring at [KManwaring@aqmd.gov](mailto:KManwaring@aqmd.gov)]  
and to the SCL-LEA [attention David Thompson at [David.Thompson@lacity.org](mailto:David.Thompson@lacity.org)].

- 4 2. The Executive Officer may request the Hearing Board hold a Status Hearing sooner than  
5 the hearing to be set in six months if, for example, South Coast AQMD issues more than  
6 two Notices of Violation (NOVs) over a consecutive four-day period and in the judgment  
7 of the Executive Officer the source of the odor has not been addressed, and such subsequent  
8 events concerning the landfill warrant the more immediate attention of the Hearing Board.
- 9 3. Respondent shall collaborate with the SCL-LEA to develop and implement protocols for  
10 the monitoring and evaluation of the effectiveness of each of the individual mitigation  
11 measures identified for implementation in this Order, and the potential effectiveness of the  
12 different mitigation measures when utilized in combination (to help determine the best  
13 complementary combination of mitigation measures for the different types of odors and  
14 different root causes). Respondents shall report back on the status of this assessment of  
15 mitigation measures, including development of protocols, at the Status Hearing identified  
16 in Condition no. 1.
- 17 4. Respondent shall perform, or cause to be performed, the following pilot projects, shall  
18 document efforts to implement the following pilot projects, and shall report back on the  
19 status of each pilot project as part of the Status Hearing identified in Condition no. 1:
- 20 a. *Microbiology-based Mitigation (Application)*: Respondent shall, within six months of  
21 issuance of this Order, incorporate application during the unloading, spreading, and  
22 compacting operations of the working face, of aerobic microbiology-based solution(s)  
23 to enhance the oxidation of odiferous compounds ("fresh trash odors") and methane  
24 within the current lift of waste being disposed, and shall initiate and support  
25 research to validate the short-term and long-term effectiveness of the application,  
26 including efforts to ensure no unintended consequences of the application.  
27 Respondent shall document application efforts and shall report back on the status  
28 of the application and research at the Status Hearing identified in Condition no. 1.
- b. *Microbiology-based Mitigation (Foam Gun Application)*: Respondent shall, to the  
extent reasonably feasible, apply odor neutralizer and microbiology-based solution(s)  
at the same time using a foam gun during the unloading, spreading, and compacting  
of the waste on the daily working face.
- c. *Microbiology-based Mitigation (EnviroCover ADC)*: Respondent shall, prior to the  
application of EnviroCover as an alternative daily cover at the end of the operating  
day, apply an additional spraying of aerobic microbiology-based solution(s) and an  
additional anaerobic microbiology-based solution(s) to enhance the oxidation of

1 odiferous compounds ("fresh trash odors") and methane within the current lift of waste  
2 being disposed.

3 d. *Microbiology-based Mitigation (Soil Enhancement Protocols)*: Respondent shall,  
4 within two months of issuance of this Order, initiate an innovative pilot program,  
5 including providing access to grids for testing, for the purpose of supplementing the  
6 effectiveness of soil, mulch, compost, (or combination of) using microbiology-based  
7 technologies to enhance the oxidation of odiferous compounds and or methane.  
8 Respondent's efforts shall include collaborating with the SCL-LEA to determine a set  
9 of evaluation protocols to determine the potential effectiveness for full-scale future  
10 application using best practices.

11 e. *Microbiology-based Mitigation (Cover Soil)*: Respondent shall, to the extent that  
12 daily cover soil and/or intermediate cover soil are utilized as a vegetative layer,  
13 make efforts to improve the biofiltration properties of the soil by improving the  
14 organic content (for example, carbon content) by adding organic soil, compost,  
15 and/or biochar to enhance the microbiology-based solution's impact on plant root  
16 growth and its ability to oxidize landfill gas in an effort to increase the  
17 phytoremediation ability of the vegetation.

18 f. *Microbiology-based Mitigation (Phytoremediation Protocols)*: Respondent shall,  
19 within two months of issuance of this Order, facilitate access and perform or cause to  
20 be performed, an application to enhance phytoremediation on multiple test grids.  
21 Respondent's efforts shall include collaborating with the SCL-LEA to determine a set  
22 of evaluation protocols to determine the potential effectiveness for full-scale future  
23 application to enhance phytoremediation using best practices. Respondent shall  
24 document the efforts to enhance phytoremediation and shall report back on the status  
25 of the efforts at the Status Hearing identified in Condition no. 1.

26 g. *Closure Turf*: Respondent shall examine the feasibility of not removing the existing  
27 Closure Turf when cell development impacts an area for the purpose of developing a  
28 landfill gas collection system and a leachate collection system that would function  
with the Closure Turf remaining in place. Respondent shall report back on the status  
of the potential to and benefits of leaving Closure Turf in place at the Status Hearing  
identified in Condition no. 1.

h. *Enhanced Surface Emissions Data Collection*: Respondent shall initiate an innovative  
pilot program for the purpose of improving surface emissions data collection (for  
example, by collecting more real time data and including data collected in the  
evenings, and for example, by use of technology such as drones and or tracked robotic  
vehicles) to identify potential problematic grids and areas (for the purpose of  
identifying areas to implement additional corrective measures) to improve landfill gas

1 collection and to minimize the potential for fresh trash odors to be carried by landfill  
2 gas emissions. Respondent shall collaborate with the SCL- LEA on the enhanced  
3 surface emissions data collection efforts and shall provide access to the Facility on a  
4 case-by-case basis as recommended by the SCL-LEA. Respondent shall report back  
5 on the status of the enhanced surface emissions data collection efforts at the Status  
6 Hearing identified in Condition no. 1.

5 5. Respondents shall address odiferous compounds, including fresh trash odors, by  
6 performing, or causing to be performed, the following measures:

7 a. At Republic owned or controlled transfer stations, Respondent shall apply odor  
8 neutralizer and incorporate aerobic (and compatible anaerobic) microbiology-based  
9 solution(s) to enhance the oxidation of odiferous compounds ("fresh trash odors") prior  
10 to disposal of that waste at the Facility:

11 i. Respondent shall document use of odor neutralizers and aerobic (and  
12 compatible anaerobic) microbiology-based solution(s), and shall make records  
13 available to the South Coast AMD upon request.

14 b. At the Facility, Respondent shall optimize use of foaming spray at the working face  
15 with an odor neutralizer, to be applied during early operating hours and during adverse  
16 meteorological conditions;

17 c. At the Facility, upon acceptance of an identified particularly odorous load, Respondent  
18 shall utilize the foam gun for spot applications;

19 d. At the Facility, upon identification of a particularly odorous load at the working face,  
20 Respondent shall cover the odorous load immediately with odor buffering/adsorbing  
21 material (such as compost, mulch, ground greenwaste, biochar, soil, or non-odorous  
22 municipal solid waste); and

23 e. Respondent shall report back at the status hearing identified in Condition no. 1 on (i)  
24 efforts to work with a third-party to develop an enhanced foam product and (ii) the  
25 effectiveness of both using a long-range foam gun and of using foaming spray at the  
26 working face during early operating hours.

27 6. Respondent shall conduct daily on-site odor patrols, which shall include efforts to identify  
28 locations of leachate seeps. These efforts shall be conducted and documented as required  
in Condition 6(c) below.

a. In the event that a leachate seep is discovered, Respondent shall utilize a portable  
sprayer to apply odor neutralizer and/or aerobic (and compatible anaerobic)  
microbiology-based (methanotrophic microbes, bacteria, etc.) solution(s) on the  
leachate seep prior to remediating the seep (e.g., covering with soil, etc.).

- 1           b. For leachate seeps that are continuous or have pooled (pooling is an
- 2           accumulation of at least 25 gallons or greater than 5 square feet of affected
- 3           surface area), Respondent shall treat the leachate with odor neutralizer and or
- 4           aerobic (and compatible anaerobic) microbiology-based (methanotrophic
- 5           microbes, bacteria, etc.) solution(s), and pump out the leachate into a closed
- 6           liquid storage container (if sufficient quantities of leachate warrant removal) and
- 7           treat at the onsite leachate treatment facility.
  
- 8           c. Respondent shall conduct and document patrols at least twice each operating
- 9           day, once in the morning, completing the patrol prior to 8 a.m. and once in the
- 10           late afternoon, starting the patrol after 3 p.m. In documenting the patrol, each
- 11           day, Respondent shall indicate the area on the map where the odor source or
- 12           leachate were identified. If leachate was discovered, the next day a follow-up
- 13           patrol must be conducted in that same area.
  
- 14                   i. In the event that two weeks of twice daily patrols show no exposed
- 15                   liquid/leachate seepage or pooling, Respondent may reduce the inspection
- 16                   frequency to once daily in the morning.
  
- 17       7. Respondent shall continue construction of the front entrance berm, including landscaping
- 18       as a physical visual barrier and a physical odor barrier, which shall include a misting system
- 19       with both odor neutralizer and a waterless vapor odor neutralizer. Respondent shall report
- 20       back on the status of the berm construction at the Status Hearing identified in Condition
- 21       no. 1.
  
- 22       8. Respondent shall implement the (previously SCL LEA-approved) 2023-2024 Wet Weather
- 23       Preparation Plan and the current 2024-2025 Wet Weather Preparation Plan, and shall
- 24       implement additional wet weather mitigation measures when feasible and appropriate, such
- 25       as grading techniques (for example, rough grading, contour grading, use of erosion control
- 26       fabrics/mats) to minimize surface erosion and to preserve the low permeability properties
- 27       of the landfill cover.
  
- 28       9. Respondent shall implement as part of its wet weather preparation and as additional odor
- mitigation, utilization of hydroseeding in areas anticipated to be most effective, as
- determined in collaboration with the SCL-LEA, for enhanced erosion control, including
- use of methanotrophic bacteria/microbes in the hydroseeding cover layer to enhance
- oxidation of odor/methane in addition to enhancing root growth of with the utilization of
- microbiology with phytoremediation properties.
  
- 10. Respondent shall, for the purpose of assessing the overall effectiveness of individual and/or
- combined mitigation measures, provide to the SCL-LEA the following: landfill gas system
- operational data, South Coast AQMD Rule 1150.1 instantaneous and integrated surface
- readings data; individual landfill gas well analytical/operational data; daily collected gas

1 volumes; and meteorological data, and shall also provide the implementation schedule and  
2 operational dates of implemented mitigation measure(s). Respondent may designate and  
3 mark as confidential data it considers "business sensitive."

4 11. Respondent shall collaborate with the SCL-LEA to identify Rule 1150.1 monitoring grids  
5 with continuing excessive surface emissions and shall enhance the intermediate cover with  
6 the most appropriate mitigation measures, which might include:

- 7 a. Application of intermediate cover to areas with daily cover, prior to the six-  
8 month regulatorily required intermediate cover application;
- 9 b. Enhancement of existing intermediate cover with extra thickness of compacted  
10 soil, with lower permeability soil, if available;
- 11 c. Enhancement of existing intermediate cover with organic topsoil (compost,  
12 mulch, or mix) to create a biofilter layer;
- 13 d. Enhancement of existing intermediate cover with vegetative cover with native  
14 plants (for enhanced biofiltration);
- 15 e. Application of EnviroCover over a protective soil buffer layer, followed by  
16 application of intermediate soil cover;
- 17 f. Application of PosiShell on top of intermediate cover;
- 18 g. Application of PosiShell (or other materials with more impermeable properties  
19 for "sealing" the top layer) on top of extra thickness soil for enhanced  
20 intermediate cover; and/or
- 21 h. Application of a soil "sealant" to increase the impermeability of soil used for  
22 daily cover and intermediate cover.

23 12. Respondent shall address grids that continue to demonstrate excessive surface emissions  
24 by prioritizing installation of shallow horizontal/slope/trench collectors at such grids, and  
25 shall assess utilization of large plastic sheeting or Closure Turf cover, with installation of  
26 flat/horizontal landfill gas collection pipes underneath the cover, and shall cover  
27 problematic grids with large plastic sheeting or Closure Turf if determined to be feasible  
28 and likely to reduce excessive surface emissions.

13. Respondent shall review the current Cell Sequencing Plan to determine the feasibility of  
optimizing the sequence to focus on filling over the grids (and including installation of  
horizontal collectors from the start of filling) where the practice of nine inches of  
compacted daily soil without peelback was implemented. If Respondent, in collaboration  
with the SCL-LEA, determines a revised Cell Sequencing Plan is appropriate, Respondent

1 shall prepare a draft 5-year Cell Development Plan, showing the current Cell and future  
2 Cells to the terminal toe berm area. Respondent shall report back on the status of Cell  
3 Sequencing Plan at the Status Hearing identified in Condition no. 1.

4 14. Respondent shall continue implementation of top-down vertical landfill gas collection  
5 wells to supplement bottom-up landfill gas collection wells (and elsewhere at the Facility  
6 as appropriate) to achieve a minimum of thirty percent (30%) overlap for the effective  
7 radius of influence of the vertical landfill gas collection wells. Respondent shall report back  
8 on its effort to achieve a minimum of thirty percent (30%) overlap at the Status Hearing  
9 identified in Condition no. 1.

10 15. Respondent shall, when feasible and appropriate, utilize larger diameter landfill gas  
11 extraction well-casings to improve vacuum levels and utilize a geosynthetic boot, bentonite  
12 seal, or additional soil layer (or combination thereof) around the base of the well-casing to  
13 minimize landfill gas leakage. Respondent shall maintain records documenting use of  
14 larger diameter landfill gas extraction well-casings and/or use of enhancements at the base  
15 of the well-casing, and shall make records available to the South Coast AQMD upon  
16 request.

17 16. Respondent shall implement a pilot project to enhance landfill gas movement by identifying  
18 and providing access to three locations in different areas of the Facility. Respondent's pilot  
19 project to enhance landfill gas movement shall include identifying and/or creating  
20 designated pathways of least resistance in the disposal mass by utilizing larger granular  
21 materials (for example, crushed concrete or large wood chips, other granular materials) in  
22 the form of a layer or a limited circular pad within a radius of influence of a vertical landfill  
23 gas well (below the sealing plug) and tied to a vertical landfill gas collection well, for  
24 among other benefits, preventing pressure build ups and/or blow-outs. Respondent shall  
25 endeavor to determine the optimum amount of interconnectivity of the pathways of least  
26 resistance (or minimum safe distance between porous material pathways) to prevent  
27 unreasonable risk of the spreading of underground oxidation events. Respondent shall  
28 document efforts to enhance landfill gas movement and to determine the optimum amount  
of interconnectivity, and shall report back on the status of such efforts at the Status Hearing  
identified in Condition no. 1.

17. Respondent shall collaborate with the SCL-LEA to develop a Smoke Test protocol to  
determine the potential odor transport pathways from the Facility to the community and  
surroundings based on the various meteorological factors and the current and future  
development topography of the Facility. Following approval by the SCL-LEA, Respondent  
shall implement the Smoke Test and use the results to assess the potential for additional  
odor mitigation measures to reduce and/or prevent the odors from reaching the community  
(such as physical barriers, dilution, or dispersion technologies, or odor neutralization and/or  
vapor phase odor neutralization techniques), and shall report on the status of the Smoke  
Test at the Status Hearing identified in Condition no. 1.

1 18. Respondent shall start partial final closure for all areas that have already reached final  
2 elevation in accordance with a final closure plan approved by the SCL-LEA and the  
3 Regional Water Quality Control Board.

4 19. Abatement Order Training: Respondent shall focus the operational parameters of the  
5 landfill gas ("LFG") collection system to prioritize an increase in the vacuum of existing  
6 wells to maximize the volume of LFG collected, with the goal of increasing collected LFG  
7 volume for the primary purpose of controlling odors by reducing surface emissions.

8 To further this goal, Respondent shall require, for all Respondent's employees and for all  
9 contractors with LFG collection system responsibilities (which includes gas well  
10 maintenance and well field tuning LFG wells) a minimum of thirty minutes of in-person  
11 training that includes an explanation of why the Stipulated Order for Abatement issued in  
12 Case 3448-18 and how the conditions are intended to reduce odors.

13 Respondent shall complete training of existing employees and contractors within thirty (30)  
14 days of the issuance of this Order. Thereafter, Respondent shall ensure training is provided  
15 to any new employee or new contractor with access to or responsibility for LFG wells  
16 within forty-eight (48) hours of that individual's initial shift at the Facility.

17 Respondent shall maintain a log of all individuals who receive training that includes the  
18 date, names, duration, and topics covered, and shall make the log available upon request.

19 20. Well Integrity Program: Respondent shall undertake a Well Integrity Program that  
20 implements the following measures:

21 a. Respondent shall prepare a Well Integrity Program status report and shall email the  
22 document to the Clerk of the Board at [COB@aqmd.gov](mailto:COB@aqmd.gov), with a copy to the South  
23 Coast AQMD [attention Larry Israel at [lisrael@aqmd.gov](mailto:lisrael@aqmd.gov)] and to the SCL-LEA  
24 [attention David Thompson at [David.Thompson@lacity.org](mailto:David.Thompson@lacity.org)] by July 31, 2026. The  
25 Well Integrity Program status report shall address the status and progress of  
26 measures required below in Conditions 2(b) – 2(f).

27 b. Respondent shall continue efforts to complete the installation of the previously  
28 planned 130 wells, including connecting each well to a header and tuning the well to  
establish equilibrium, and shall report on the progress towards 130 wells in the Well  
Integrity Program status report required by Condition 2(a).

c. Respondent shall inspect all existing wells to determine if any well is pinched,  
silted-in, flooded, or otherwise damaged and for any such LFG well that is not  
operating at full design capacity, Respondent shall meet and confer with the SCL-  
LEA to determine whether to repair or replace such a well that is underperforming.  
Respondent shall report on the progress towards inspecting existing wells, including

1 any repaired or replaced well, in the Well Integrity Program status report required  
2 by Condition 2(a).

3 d. Respondent shall meet and confer with the SCL-LEA to evaluate the need for  
4 additional LFG wells beyond the 130 new wells, which shall include the physical  
5 inspection of all existing wells required in Condition 2(c) above. Depending on the  
6 results of this inspection and the dewatering program in progress, Respondent shall  
7 target additional vertical wells and additional replacement wells for any damaged,  
8 pinched, silted-in, or flooded wells determined through such consultation to be  
9 underperforming. To the extent that remedial measures and well dewatering is  
10 successful, Respondent may increase or reduce the number of additional wells,  
11 provided the Well Integrity Program status report provides the rationale for this  
12 determination. Respondent shall report back on the initial progress of evaluating the  
13 needs for additional wells in the Well Integrity Program status report required by  
14 Condition 2(a).

15 e. Respondent shall implement the Well Integrity Program with the goal of increasing  
16 LFG collection coverage and the volume of LFG collected (measured in cubic feet  
17 per minute or "CFM") to achieve a minimum range of 20,000 CFM – 21,000 CFM  
18 by December 2026.

19 Respondent shall not be considered in violation of this condition for failing to  
20 achieve the above range provided Respondent demonstrates reasonable efforts in  
21 consultation with the SCL-LEA to improve the volume of gas collected and  
22 Respondent reports on progress towards this goal in the Well Integrity Program  
23 status report required by Condition 2(a) and supplemental Well Integrity Program  
24 status reports required by Condition 2(f).

25 f. Respondent shall submit a Supplemental Well Integrity Program status report every  
26 six months [from the date of the initial report required by Condition 2(a)] to the  
27 Clerk of the Board at [COB@aqmd.gov](mailto:COB@aqmd.gov), with a copy to the South Coast AQMD  
28 [attention Larry Israel at [lisrael@aqmd.gov](mailto:lisrael@aqmd.gov)] and to the SCL-LEA [attention David  
Thompson at [David.Thompson@lacity.org](mailto:David.Thompson@lacity.org)].

Supplemental Well Integrity Program status reports shall address the Pin Well Plan  
required by Condition 5 below and shall address the progress and status of measures  
required by Conditions 2(b) – 2(e), including the number of new wells, status of new  
wells, number of wells inspected, any remedial actions taken, and the need for  
additional wells (which shall include a target number and estimated timeline, taking  
into account the availability of space for additional wells to avoid overlapping zones  
of influence).

1 21. Dewatering Legacy Damage Area: Respondent shall implement an aggressive dewatering  
2 plan specifically focused on the Legacy Damage area to increase the LFG collection  
3 efficiency of the existing LFG wells impacted by rainwater. As part of the dewatering plan,  
4 Respondent shall obtain for simultaneous use a minimum of 25 pumps (rated to be as  
5 effective as or better than Lorentz brand pumps) and shall track metrics to help determine  
6 the effectiveness of the approach to dewatering wells in the Legacy Damage area.

7 Respondent shall, within ninety (90) days of issuance of this Order, deploy available pumps  
8 and shall document the number, location, and use of deployed pumps, as well as metrics  
9 used for determining the effectiveness, and shall make records available upon request.

10 22. Geosynthetic Clay Liner Permitting: Respondent shall, within six months of issuance of  
11 this Order, initiate permitting with the Los Angeles Regional Water Quality Control Board  
12 for a geosynthetic clay liner (GCL) cap (which is intended to reduce surface emissions  
13 while limiting the need for imported soil).

14 Respondent shall target construction of the permitted cap to cover approximately 20 acres  
15 by December 2028 (advancing the original 2034 estimate). Respondent shall email  
16 documentation within two (2) business days of initiating permitting for the GCL cap to the  
17 SCL-LEA [attention David Thompson at [David.Thompson@lacity.org](mailto:David.Thompson@lacity.org)] and to the South  
18 Coast AQMD [attention Larry Israel at [lisrael@aqmd.gov](mailto:lisrael@aqmd.gov)].

19 23. Pin Well Proposal and Plan: Respondent shall, within ninety (90) days of issuance of this  
20 Order, submit a written proposal for the planned installation of Pin Wells, intended to  
21 supplement vertical wells and bottom-up wells. The proposed plan shall address, at  
22 minimum, the location, type, number, and potential timeline for installation of Pin Wells.

23 Respondent shall email the proposed Pin Well Plan to the SCL-LEA [attention David  
24 Thompson at [David.Thompson@lacity.org](mailto:David.Thompson@lacity.org)], with a copy to the South Coast AQMD  
25 [attention Larry Israel at [lisrael@aqmd.gov](mailto:lisrael@aqmd.gov)].

26 Respondent shall, within one week of written approval of the Pin Well Plan by the SCL-  
27 LEA, email the approved Pin Well Plan to the SCL-LEA [attention David Thompson at  
28 [David.Thompson@lacity.org](mailto:David.Thompson@lacity.org)], with a copy to the South Coast AQMD [attention Larry  
Israel at [lisrael@aqmd.gov](mailto:lisrael@aqmd.gov)]. Respondent shall respond to all written requests for  
information intended to inform the Pin Well Plan, including evaluation protocols and  
performance metrics for monitoring the Pin Wells, from the SCL-LEA within forty-eight  
(48) hours of receipt. Respondent shall implement the Pin Well Plan as approved.

Respondent shall include the status of and progress towards implementing the Pin Well  
Plan in the Supplemental Well Integrity Program status reports required above by  
Condition 2(f).

24. Daily Cover Inspections: Respondent shall designate a dedicated team to conduct daily

1 visual inspections on days the landfill is operating of the daily cover, alternative daily cover,  
2 and intermediate cover(s) to determine the integrity and performance of the covers. For  
3 any identified weakness or breach (e.g., tears, erosions, settlement cracks, erosion after  
4 rainfall, etc.) that creates a potential pathway of least resistance for landfill gas or trash  
5 odors, Respondent shall locate the problem area via GPS and shall provide the information  
6 to the operational field crew, who shall implement mitigation at the located issue within  
7 three operating days. Respondent shall maintain daily records documenting the time of the  
8 daily visual inspection, the location and a description of any observed weakness or breach,  
9 and the mitigation deployed, and shall make the records available upon request.

10 Good cause appearing, it is so ordered.

11  
12 For the Board: \_\_\_\_\_

13  
14 Date Signed: \_\_\_\_\_