Updated: Friday, August 29, 2025

SCAQMD Order for Abatement Tasks
Sunshine Canyon Landfill
Sylmar, California

Task No./ Order Condition No.	Task Description 20 APR 23 P2	Task-Specific Deliverable	Responsibility	Due Date	Progress as of August 29, 2025
10	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 volumes; and meteorological data with corresponding date ranges.	Provide Access	BFIC	Not specified	SCL LEA now has access to all data, including individual well data.
11	Collaborate with the SCL-LEA to identify Rule 1150.1 monitoring grids with continuing excessive surface emissions and enhance the intermediate cover with the most appropriate mitigation measures. Eight potentially appropriate mitigation measures listed in 11a through 11h.	Grid Map	BFIC, WCG, & SCL LEA	Not specified	A total of 58 grids with methane > 100 ppmv identified based on monthly surveys in Jan thru Apr. 2025. Most of the 58 grids have already been addressed with Posi-Shell, enhanced intermediate soil cover, additional MSW cover, & mulch. Others will be addressed by Closure Turf repairs and application of microbial solution(s).
12	Address grids that continue to demonstrate excessive surface emissions by prioritizing installation of shallow horizontal/slope/trench collectors at such grids, and assess utilization of large plastic sheeting or Closure Turf cover, with installation of flat/ horizontal landfill gas collection pipes underneath the cover, and cover problematic grids with large plastic sheeting or Closure Turf if determined to be feasible and likely to reduce excessive surface emissions	None	BFIC w/ Landmarc support	Not specified	In progress as necessary. Seep near 2024 Posi-Shell area dug out and sumps installed.
13a	Review the current Cell Sequencing Plan (in collaboration with SCL-LEA) 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 9 inches of compacted daily soil without peel back was implemented	None	BFIC w/ SCS & GLA support	Not specified	Cell sequencing plan modified and selected grids with methane > 100 ppmv have already been covered with additional lifts of MSW.
13b	If appropriate based on Task 13a, draft a 5-year Cell Development Plan	None	BFIC w/ GLA support	Timeline dependent on Condition 13a	Ongoing need to cover grids with methane > 100 ppmv will be factored into future Cell Development Plans
14	Continue implementation of top-down vertical landfill gas collection wells to supplement bottom-up landfill gas collection wells (and elsewhere at the Facility as appropriate) to achieve a minimum of 30 percent overlap for the effective radius of influence of the vertical landfill gas collection wells.	None	BFIC w/ SCS & Landmarc support	Not specified	Installation of 108 new gas wells (Phases 1 & 2) began 4/23; averaging 2 wells per day but lost ~4 weeks due to accident. Now operating three drill rigs to make up for lost time. Phase 3 of drilling program will include ~ 22 wells, the locations of which will complement the existing wells.
15a	Utilize larger diameter landfill gas extraction well-casings to improve vacuum levels and utilize a geosynthetic boot, bentonite seal, or additional soil layer (or combination thereof) around the base of the well-casing to minimize landfill gas leakage.	None	BFIC w/ SCS & Landmarc support	Not specified	Of the 108 new wells in Phases 1 and 2, 14 will feature 10" versus 8" well casings.
15b	Maintain records from Task 15a and make available to SCAQMD	Records	BFIC w/ WCG support	Not specified	Records will be made available.
16	Implement a pilot project to enhance landfill gas movement by identifying and providing access to three locations (wells) in different areas of the Facility	SCS Tech Memo w/ drawings	BFIC w/ SCS support	Not specified	~15' x ~15' Square "waffles" being installed on four bottom-up landfill gas wells near current working face. Waffles consist of ~2' of drainage rock with geotextile top and bottom to enhance landfill gas recovery and increase radius of influence.
17a	Collaborate with the SCL-LEA to develop a smoke test protocol to assess 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	Work Plan	BFIC w/ SCS support	~ September 2025	SCS preparing work plan for SCL LEA review and approval with planned fall 2025 implementation when prevailing winds are adverse (to the south).
17b	Conduct smoke tests 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)	Report	BFIC w/ SCS support	Late 2025/early 2026	Smoke tests scheduled for October/November 2025, when prevailing winds are adverse (to the south). Report expected late 2025/early 2026.
18	Start partial final closure for all areas that have already reached final elevation in accordance with a final closure plan approved by the SCL-LEA and the Regional Water Quality Control Board	Conceptual Alternate Final Cover Design	BFIC w/ GLA support	Not specified	First final closure area (~20 acres) identified but clay not available for "prescriptive" final cover. Will take several months for LARWQCB to review and approve alternative final cover design. Unlikely to be ready to implement until 2026 at the earliest.

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1a	Prepare written status report at least 30 days in advance of Status Hearing on September 3, 2025, so status report due on or before Monday, August 4, 2025	Reports to SCAQMD	Tom Bruen (Status Rpt.)	30 days prior to 9/3 hearing	Required Status Report submitted to SCAQMD on August 1, 2025
			WCG (Technical Rpt.)	Prior to hearing	WCG technical corollary to status report submitted August 20, 2025
1b	Attend Status Hearing on September 3, 2025	None			BFIC & WCG to attend
2	Possibly attend an earlier hearing	None			Earlier hearing not anticipated.
3	Develop and implement protocols to monitor and evaluate the effectiveness of each individual mitigation measure identified in the Order and potential effectiveness of combined mitigation measures. This is a general requirement with task-specific deliverables as noted below.	Protocols for SCL-LEA approval	Vendors/SCL-LEA/WCG	As scope of tests is defined but generally ASAP	Ongoing iterative process between vendors and SCL LEA with input from BFIC and WCG on scalability to larger-scale application at SCL.
Aerobic Microbiology					
4a	Microbiology-based Mitigation (Application) - application of aerobic microbiology-based solution(s) to enhance the oxidation of odiferous compounds (fresh trash odors) during waste unloading, spreading, and compacting operations at the working face. SCL LEA's preference was to use Eco-Flush solution, manufactured in South Africa, for this application, but due to supply chain problems, BFIC (with SCL LEA concurrence) has been using Bio Cleanse until Eco Flush is delivered.	None	*Bio Cleanse* provided by The Living Earth Foundation (LEF) delivered to SCL on May 21, 2025. Started applying to working face Tuesday 6/3/25. *Bio Cleanse/Weaver* Foam combo in mornings since 6/17/25 and *Bio Cleanse* alone at end of day.		
		None	*Eco-Flush* from South Africa ordered on 5/15/25 but shipment via sea "held up in ports" so USA Sludge (US distributor) volunteered second order via air-freight, which was expected at SCL on 7/31/25, but still has not shown up. Meanwhile the order shipped via sea is expected at SCL on 8/29/25. On receipt, BFIC will begin spraying working face with *Eco-Flush* rather than *Bio Cleanse*.		
		None	Bio SI's *Ag Formula* and *SD25* are alternate microbial solutions that could be applied to the working face but *Bio Cleanse* and *Eco-Flush* being evaluated first. Bulk order of *Ag Formula* and *SD25* delivered to SCL 7/31/25 for other applications.		
4b	Microbiology-based Mitigation (Foam Gun Application) - application of odor neutralizer and microbiology-based solution(s) at the same time using a foam gun during waste unloading, spreading, and compacting operations at the working face.	None	Laboratory testing directed by WCG chemist (Dr. Manny Varona-Torres) has determined that the surfactant in WCG odor neutralizer is NOT detrimental to Bio SI microbiology in terms of effectiveness. WCG's 7/22/25 Tech Memo to that effect included in WCG's 8/20/25 technical report. The consensus is that the surfactant in WCG's odor neutralizer will not be detrimental to any of the other microbial solutions.		
4c	Microbiology-based Mitigation (Enviro Cover ADC) - additional spraying of aerobic microbiology-based solution(s) within the current lift of waste being disposed, prior to application of Enviro Cover alternative daily cover at the end of each operating day	None	*Bio Cleanse* delivered to SCL on May 21, 2025. Started applying to working face Tuesday 6/3/25. *Bio Cleanse/Weaver Foam* combo in mornings since 6/17/25 and *Bio Cleanse* alone at end of day. Will switch to using *Eco-Flush* upon receipt of shipment from South Africa.		
Living Earth Foundation (LEF) Phytoremediation Microbiology					
4d(1)	Collaborate with SCL-LEA to establish evaluation protocols for Task 4d(2) within two months	Evaluation Protocol	SCL LEA & LEF	Pending	LEF *Bio Cleanse* delivered to SCL 5/21/25, but two original test areas staked out in field were filled over. SCL LEA has staked out two new plots and BFIC started watering 6/19/25 to encourage new plant growth. New plant growth very modest but expect to finalize protocol and apply *Bio Cleanse* in September 2025.
4d(2)	Microbiology-based Mitigation (Soil Enhancement Protocols) - initiate an "innovative" pilot program for the purpose of supplementing the effectiveness of soil, mulch, compost, or combination thereof, using microbiology-based technologies, in an unspecified number of "grids."	Pilot Program	LEF & SCL LEA w/ BFIC & WCG support	In progress	BFIC has covered large area of "top deck" with additional intermediate cover soil and has spread mulch over around 2 acres. Currently evaluating which microbial solution(s) to apply.
4e	Microbiology-based Mitigation (Cover Soil) - to the extent possible, make efforts to improve biofiltration properties of the soil by improving organic content by adding organic soil, compost, and/or biochar to enhance the microbiology-based solution's impact on plant root growth and ability to oxidize landfill gas in an effort to increase phytoremediation ability of vegetation	None	LEF & SCL LEA w/ BFIC & WCG support	Pending	
Windfall Bio Phytoremediation Microbiology					
4f(1)	Collaborate with SCL LEA to establish evaluation protocols for Task 4f(2) within two months	In Progress	Windfall Bio & SCL LEA w/ support from WCG	Windfall Bio bench-scale and field tests complete. Test plots established in field and SCL LEA began daily baseline methane monitoring on 5/14/25. Windfall Bio-designed flux boxes fabricated and delivered to SCL 5/30/25. Test pad completed and flux boxes installed 6/3/25. SCL LEA began baseline methane monitoring in flux boxes 6/4/25. Flux boxes on flat area inoculated with *MEMS* on 6/17/25. Flux box on slope inoculated 6/24/25. Windfall Bio report issued 8/18/25. Field tests indicate *MEMS* successfully metabolize methane and NMOCs. .	
4f(2)	Microbiology-based Mitigation (Phytoremediation Protocols) - application to enhance phytoremediation in multiple test grids.	None	Windfall Bio & SCL LEA w/ support from WCG	Pending	Windfall Bio MEMS will be one of a few microbial solutions applied to enhanced intermediate cover soil on top deck (Conditions 4d and 4e)

Weaver Consultants Group