

**SUNSHINE CANYON CITY/COUNTY LANDFILL
FINDING OF CONFORMANCE PROPOSAL**

**BFI Responses to Comments of Los Angeles County Facility and Plan Review
Subcommittee Dated July 16, 2008**

Each comment is listed in italics below, followed by BFI's response. The numbers preceding each comment reference the corresponding requirement listed in Table 10-1 of the Countywide Siting Element (CSE). Replacement pages for the FOC document are attached based on the responses below.

2. A 2x3' map of the project location that is stamped and signed by a registered civil engineer.

Response: BFI is providing herewith JTD Figures 1 and 2, reproduced on 2' x 3' sheets and stamped and signed by a registered civil engineer.

3. A project implementation schedule (as applicable) including planned dates for construction start, construction completion, start-up, planned expansion, and closure.

Response: Item 3 has been revised in the enclosed replacement pages to read as follows.

BFI anticipates the following implementation schedule:

- | | |
|---|----------------|
| • Commence operations as City/County Landfill | September 2008 |
| • Begin construction in area between existing City and County Landfills | January 2009 |
| • Expansion | None |
| • Closure | 2037 |

6. Staff needs to add a Finding of Conformance condition to limit waste stream to In-County Jurisdictions.

Response: The following text has been added to the FOC document under Item 6:

"As provided in Condition 78 of CUP No. 00-194-(5), Sunshine Canyon Landfill will not receive for disposal any solid waste originating from outside of Los Angeles County."

7. A table showing waste quantity projections to be handled at the start-up and five-year intervals of the project's life. A copy of the table needs to be sent to the City of LA for comments.

At the start-up of the City/County landfill the remaining capacity of the landfill is 110,718,000 cubic yards. The projected site life is 30 years ending in 2037.

Item 7 has been revised in the attached replacement pages to read as shown below.

The maximum waste intake rate in the City/County Landfill will not exceed 12,100 tons, including materials received for beneficial use and recycling on any given day. The maximum permitted weekly quantity is 66,000 tons of non-hazardous solid waste and 6,600 tons of material for beneficial reuse and recycling. The combined total of MSW and materials for beneficial use or recycling may not exceed 72,600 tons per week.

Actual projected volumes are anticipated to be as follows:

YEAR	TONS/DAY ¹	TONS/YEAR ²
2008	8,500	1,892,100
2009	9,200	2,535,520
2010	9,200	2,535,520
2015	9,200	2,535,520
2020	9,200	2,535,520
2025	9,200	2,535,520
2030	9,200	2,535,520
2035	9,200	2,535,520
2037	9,200	925,340

9. A description of the proposal for recovering methane for a Gas-to-Energy facility.

The following paragraph has been added to Item 9:

BFI has entered into an agreement with "Sunshine Gas Producers, LLC" to develop an economically viable landfill gas to energy project. Sunshine Gas Producers is preparing applicable air permits and electrical interconnect applications. Sunshine Gas Producers anticipates using Mercury turbine engines (same as those used at Brea Olinda, Calabasas and Chiquita landfills) to generate electricity. Environmental reviews are expected to be completed by mid-2009, with implementation scheduled for mid-2010.

11. A plan for the end uses for the County and City sides.

The existing text of the FOC document, which is taken directly from the project Joint Technical Document, describes the planned use of the site as open space. No additional information is available at this time.

¹ Source: Joint Technical Document, City-County Landfill, Revised May 2008

² Annual volume based on 5.3 days/week at stated daily tonnage, and 52 weeks/year

13. A description of the proposal in using recovered landfill gas.

Item 10 of the CSE Table 10-1 applies to resource recovery facilities ("transformation" facilities, including waste-to-energy and materials recovery facilities), not to landfills, hence the existing FOC document statement that the item is not applicable. Please see the response to Item 9 above for a description of the proposed landfill gas-to-energy project.

14. A description of the proposal in using Green Waste as ADC and diverting waste tires and other recovered material.

- Please refer to the Joint Technical Document (JTD), which contains the following description of green waste use as ADC in Section B.5.2.1:

Processed green material used as ADC will be spread over the compacted refuse surface at the conclusion of the workday. The area of refuse receiving processed green material ADC will be completely covered in a compacted layer with a minimum of 6 inches and no more than an average of 12 inches. Processed green material ADC utilized on the prior day will either be covered by additional refuse or receive soil daily cover by the conclusion of work on the following day. Processed green material ADC will not be used if the landfill will be closed the following day. Native soils will be used exclusively as daily cover material on those days.

Processed green material utilized for ADC will originate from either off site processor(s) or from an on site processing operation that may be established in the future. Regardless of the source, the processed green material ADC will be clean and free of refuse contamination and be processed (ground, shredded, screened, or by other means) to provide a compacted material free of open voids in the ADC cover.

Scrap tires are not accepted at Sunshine Canyon Landfill. Please refer to Section B.3.7.12 of the JTD for the following description of diversion and recovery facilities and operations:

Bins are currently provided near the green waste area for customers to deposit source-separated recyclable glass, metal or paper materials. Customers are also allowed to deposit waste oil in storage tanks at this location. Customers will not be allowed to deposit recyclables or waste oil without supervision by BFI employees. As the landfill develops, these facilities will be relocated to the future office and scale area north of the City Landfill.

Inert Construction/Demolition waste (concrete and asphalt) is beneficially re-used for wet weather decks, all-weather access roads and other site construction activities such as rip-rap or channel erosion protection. The operations are generally located near the working area and are moved as the landfill develops to follow the movement of the working area. Materials

operations are generally located near the working area and are moved as the landfill develops to follow the movement of the working area. Materials are deposited and then processed with on-site equipment (e.g. dozers and compactors) and incorporated as needed into the deck, road or other construction activity. Infeed material may be stockpiled for extended periods before being processed depending on the time of year and the need for construction materials.

Other recycling activities are anticipated in support of the SCL. Anticipated activities include the following: California Redemption Value (CRV) buy-back center, public direct haul waste convenience center, and as markets allow, other construction/demolition waste recycling activities. As necessary, the LEA and other regulatory approvals will be obtained prior to operation (such as equipment permits from SCAQMD).

15. City's approval is needed for Phase II. In order to receive approval from the County, the City's approval is required.

Response: BFI believes there is no such requirement in the language of the Replacement CUP. This topic has been discussed exhaustively in prior communications with County staff. Included in our prior communications with County staff is correspondence from the City of Los Angeles Planning Department stating that no Phase II approval is required as a pre-condition to the commencement of joint City/County landfilling operations at Sunshine Canyon. The correspondence confirms that the City has approved a 452-acre joint City/County landfill of approximately 90 million tons as supported by the SEIR. There is no requirement that the City must approve Phase II before joint City/County landfill operations may commence. Indeed, the correspondence indicates that during Phase I of the City landfill, joint City/County landfilling operations may commence.

Accordingly, BFI maintains that it has vested rights for operation of a combined City/County landfill in its entirety.

16. Provide a copy of the liner system design details including details of liner interface and overlap with the closed Unit 1 of the City Landfill. Also provide a copy of the leachate collection system, gas collection system, and perimeter gas monitoring system.

Response: Please see the attached drawing from the City/County Landfill JTD, located in Appendix E of the City/County Landfill JTD:

- Figure 15 LCRS Plan (Existing and Proposed)
- Figure 18 Existing and Proposed Gas Collection System
- Figure 19 and 23 Liner Sections and Typical Landfill Gas Well
- Figure 24 (Liner) Detail Sheet
- Figure 24A Detail Sheet – Overlap on Unit 1 of City Landfill

20. A 2x3' map with the signature of a registered CE. Identify Gas Recovery Wells on the maps.

Response: BFI is supplying herewith the drawings listed below at the requested size, stamped and sealed by a registered Civil Engineer. Gas recovery wells are shown on Drawings 18 and 19. The drawings will replace the drawings presently contained in Appendix E of the FOC document

Figure 1	Location and Vicinity Map (in Figures section of FOC)
Figure 2	Existing Site Plan (in Figures section of FOC)
Figure 6	Proposed Phasing Plan
Figure 7	Final Grading Plan
Figure 9	Master Excavation Plan
Figure 13	Full Development Site Plan
Figure 15	LCRS Plan (Existing and Proposed)
Figure 18	Existing and Proposed Gas Collection System
Figure 19 & 23	Liner Sections and Typical Landfill Gas Well
Figure 24	(Liner) Detail Sheet
Figure 24A	Detail Sheet - Overlap on Unit 1 of City Landfill

21. From Page 10-4 of CSE, Provide information to address Items 2a, 2b, 2c, 3a, 3b, & 3c.

Items 2a, 2b and 2c are addressed in Section 22 of the FOC Proposal submittal, entitled "Landfill Capacity Conservation Program".

Items 3a, 3b and 3c are addressed in Section 23 of the FOC Proposal submittal, entitled "AB939 and Litter Control". This section has been updated as follows to reflect current practice and permit requirements:

- a. BFI operates a waste origin recording program at the scalehouse of the City/County Landfill. The jurisdiction of origin of each load is recorded and entered into the computerized waste receipt and billing data base. Semi-monthly reports will be created and submitted to the County summarizing the total tonnage of waste received from each jurisdiction during the reporting period.
- b. BFI discourages the transportation of uncovered waste by imposing penalties for loads arriving at the scalehouse without proper tarps installed over the waste load. As described in Item 16 above, repeat violators may be excluded from future use of the landfill.
- c. Portable litter fences are deployed to minimize the amount of wind-blown litter leaving the active disposal area. BFI cleans the access road and other areas of the site daily to remove litter.

- d. Once each week, or more frequently if required, BFI crews provide litter control to the following public roads in the vicinity to remove any debris that may have spilled from vehicles transporting waste to the site:
- In O'Melveny Park;
 - Along Balboa Boulevard, San Fernando Road and Old Sepulveda Road; and
 - In other areas within a 1.5 mile radius of the landfill

Replacement FOC Document Pages

- Page 1
- Pages 3, 4, 4A
- Pages 22, 23, 24, 25

6. Waste Sources

Wastes are received from municipalities and private individuals and companies, primarily in the City of Los Angeles, other incorporated cities and unincorporated areas of Los Angeles County. As provided in Condition 78 of CUP No. 00-194-(5), Sunshine Canyon Landfill will not receive for disposal any solid waste originating from outside of Los Angeles County.

7. Waste Quantity at Start-up and at Five-Year Intervals

The maximum waste intake rate in the City/County Landfill will not exceed 12,100 tons, including materials received for beneficial use and recycling on any given day. The maximum permitted weekly quantity is 66,000 tons of non-hazardous solid waste and 6,600 tons of material for beneficial reuse and recycling. The combined total of MSW and materials for beneficial use or recycling may not exceed 72,600 tons per week.

Actual projected volumes are anticipated to be as follows:

YEAR	TONS/DAY ¹	TONS/YEAR ²
2008	8,500	1,892,100
2009	9,200	2,535,520
2010	9,200	2,535,520
2015	9,200	2,535,520
2020	9,200	2,535,520
2025	9,200	2,535,520
2030	9,200	2,535,520
2035	9,200	2,535,520
2037	9,200	925,340

8. Waste Transport Corridors

The existing site entrance at San Fernando Road will continue to be used. Access routes leading to the San Fernando Road entrance include the following:

- North along the Golden State Freeway (I-5);
- South along the Antelope Valley Freeway (SR14);
- West along the Foothill Freeway (I-210)
- Southeast along the Golden State Freeway (I-5);
- North along the San Diego Freeway (I-405);
- East and West along the Simi Valley Freeway (SR118)
- North on San Fernando Road; and

¹ Source: Joint Technical Document, City-County Landfill, Revised May 2008

² Annual volume based on 5.3 days/week at stated daily tonnage, and 52 weeks/year

- North on Balboa Boulevard to San Fernando Road. (This route is restricted to small vehicles only, less than six tons, except for trash collection vehicles that serve the local communities).

9. Technology for Treatment Facilities

Solid waste will not be treated prior to disposal. Leachate is collected, stored and treated as necessary to meet regulatory requirements for discharge to the Los Angeles City sewer system. The existing leachate treatment facility at the Sunshine Canyon City/County Landfill uses a system of air strippers, coalescing filters and carbon absorption filters to remove volatile and semi-volatile organic compounds and reduce total toxic organic compounds before being discharged to the Los Angeles City sanitary sewer. The existing treatment facility will be located from its present location to elsewhere on the site during implementation of the City/County Landfill.

Landfill gas is collected and treated in the landfill gas management system, which currently includes Flare Stations 1, 3 and 8 to incinerate landfill gas in accordance with permit requirements of the South Coast Air Quality Management District. Landfill gas condensate is collected and treated as required prior to discharge to sanitary sewer or incineration in the gas flare stations, according to requirements of regulatory agencies having jurisdiction over these practices. One or more additional flares, and a potential gas-to-energy facility will be developed during implementation of the City/County Landfill.

BFI has entered into an agreement with "Sunshine Gas Producers, LLC" to develop an economically viable landfill gas to energy project. Sunshine Gas Producers is preparing applicable air permits and electrical interconnect applications. Sunshine Gas Producers anticipates using Mercury turbine engines (same as those used at Brea Olinda, Calabasas and Chiquita landfills) to generate electricity. Environmental reviews are expected to be completed by mid-2009, with implementation scheduled for mid-2010.

THE REMAINDER OF THIS PAGE IS
INTENTIONALLY BLANK.

10. Planned Site Classification

Sunshine Canyon City/County Landfill is a Class III Solid Waste Landfill as defined in 27 CCR 20260.

11. Planned End Uses

The proposed post-closure end use for SCL City/County Consolidation is open space. This end use may change in response to public needs at the time the landfill is closed. A Final Closure Plan describing the final cover and landscape plan will be prepared and submitted to the appropriate regulatory agencies (e.g., CIWMB, LEA and RWQCB) two years prior to the anticipated closure date. A separate discretionary action and CEQA review and clearance will be required prior to approval of the final closure plan. As required by [Q] Condition B.7.c of the Amended Zone Change Ordinance [Los Angeles City, 1999], upon completion of the post-closure period, BFI will contact “. . . the City Department of Recreation and Parks and the Santa Monica Mountains Conservancy for their consideration of the site as parkland”. However, any future development of the project site would be consistent with City and County General Plan elements and zoning requirements.

12. Final Environmental Documentation

Environmental review of the City/County Landfill as described in this Application was performed separately by Los Angeles County and the City of Los Angeles. The original CEQA documentation for Sunshine Canyon Landfill was completed by the County of Los Angeles as lead agency by certification of the Final Environmental Impact Report in 1991 (State Clearing House Number 89071210). Based on this approval, Los Angeles County issued Conditional Use Permit (CUP) No. 86-312-(5) authorizing development of the Sunshine City/County Landfill with limits described by CUP Exhibit “A”, and an estimated capacity of 16.9 million tons of waste capacity. The CUP also provided that the waste limits and capacity would be increased without further County action or amendment of the CUP upon approval by

THE REMAINDER OF THIS PAGE IS
INTENTIONALLY BLANK.

- Granada Hills-Knollwood Community Plan
- Open Space Plan
- Citywide General Plan Framework Element
- City-Collected Refuse Disposal Plan
- City Solid Waste Management Plan

General Plan Consistency as mandated by PRC 50000 was established by the City of Los Angeles on December 9, 1998 by approval of the above-referenced General Plan Amendment and zone change.

Appendix C contains documentation related to the land use approvals of the County and City.

18. Tarping Program

Sunshine Canyon Landfill requires all incoming refuse loads to be transported in closed vehicles or covered by a secure cover that prevents litter from escaping during transport. Penalties are assessed against customers who fail to comply with the tarping requirement. A written notice similar to the following is made available to customers in English and Spanish at the gatehouse:

Tarps or Covers Are Required

- Permit conditions (CUP 00-194-(5)) and the State Vehicle Code (Section 23115) mandate that incoming AND outgoing loads must be covered if necessary prevent to litter.
- You must arrive at the gate with your vehicle covered. Placing tarps/covers while parked on Sunshine Canyon Landfill property is not acceptable.
- If residual trash remains in your vehicle after dumping, and it could cause windblown litter on the road, you must leave the disposal area with your vehicle covered.

Penalties:

1st offense per company per year:	Warning
2nd offense per company per year:	\$100
3rd offense per company per year:	\$500
4th offense per company per year:	Termination of Disposal Privileges
Non-payment of penalties:	Termination of Disposal Privileges

19. Load-Checking Program

Please refer to Appendix D for a detailed description of the load checking program for Sunshine Canyon City/County Landfill. The program includes activities at the scale house and at the active disposal working face to prevent the discharge of unacceptable wastes at the landfill.

Personnel at the scalehouse entry to the site conduct the following activities as provided by the program:

- Driver interviews
- Direct visual inspection, including the use of overhead mirrors
- Use of remote television monitors to inspect incoming roll-off type loads and open loads
- Portable and fixed radiation detection devices
- Portable sensors capable of detecting VOCs in contaminated soils scheduled for landfill disposal

Unacceptable loads are denied access or directed by landfill personnel to a designated area for further inspection if hazardous waste is suspected. If the vehicle then is found to contain unacceptable waste, it will be taken to an isolated area of the site for visual inspection and determination of how to manage the material.

At the working face, selected vehicles are directed to an isolated area and instructed to discharge their load for a random visual load check. A minimum of six random load checks are conducted each day.

20. Facility Plans

Appendix E contains the permit-level drawing sheets presenting the plans for Sunshine Canyon City/County Landfill, prepared for the Joint Technical Document submitted for review by the RWQCB and CIWMB.

21. Seismic Monitoring Program

BFI implements a seismic monitoring program including the following elements:

- a. A recording accelerometer has been installed on site, under the direction of a California Registered Civil Engineer, and is being operated for continuous monitoring of seismic ground motions.
- b. A detailed site inspection and damage assessment will be conducted after any major seismic event, and a report submitted to the Los Angeles County Department of Public Works and the Local Enforcement Agency.

22. Landfill Capacity Conservation Programs

BFI will continue to implement the programs currently in place at Sunshine Canyon City/County Landfill directed toward the conservation of landfill capacity:

- a. Pricing incentives are offered for clean loads of inert waste materials such as soil, concrete and asphalt rubble. These materials are received and stockpiled

away from the active disposal area, and used for on-site construction of roads and wet weather tipping areas.

- b. BFI operates active disposal areas in a manner that achieves the highest practical degree of compaction of the disposed materials. Waste is spread by a dozer or compactor blade in lifts of approximately one to two feet thick, then compacted by multiple passes of a heavy-duty compactor before the next lift is spread.
- c. BFI will use geosynthetic fabric alternative daily cover (ADC) to the maximum extent possible, in order to minimize the volume of soil used for daily cover. Green waste will also be used as ADC as it becomes available.
- d. Whenever feasible, significant soil stockpiles will be placed over completed or interim waste fills to promote additional compaction due to surcharge.

23. AB939 and Litter Control

- a. BFI operates a waste origin recording program at the scalehouse of the City/County Landfill. The jurisdiction of origin of each load is recorded and entered into the computerized waste receipt and billing data base. Semi-monthly reports will be created and submitted to the County summarizing the total tonnage of waste received from each jurisdiction during the reporting period.
- b. BFI discourages the transportation of uncovered waste by imposing penalties for loads arriving at the scalehouse without proper tarps installed over the waste load. As described in Item 16 above, repeat violators may be excluded from future use of the landfill.
- c. Portable litter fences are deployed to minimize the amount of wind-blown litter leaving the active disposal area. BFI cleans the access road and other areas of the site daily to remove litter.
- d. Once each week, or more frequently if required, BFI crews provide litter control to the following public roads in the vicinity to remove any debris that may have spilled from vehicles transporting waste to the site:
 - In O'Melveny Park;
 - Along Balboa Boulevard, San Fernando Road and Old Sepulveda Road; and
 - In other areas within a 1.5 mile radius of the landfill

REFERENCES

City of Los Angeles, 1999. "Notice of Determination and CEQA/General Plan Findings". City of Los Angeles Planning Department, December 13, 1999.

GeoSyntec Consultants, Inc., 2002. "Joint Technical Document – Phase 1 of City Landfill Unit 2, Sunshine Canyon Landfill". 2 volumes, 23 February 2002.

A-Mehr, Inc., 2006. "Joint Technical Document – Sunshine Canyon City/County Landfill". 2 volumes, February 2006, updated May 2008.



DEAN EFSTATHIOU
CHAIRMAN

LOS ANGELES COUNTY
SOLID WASTE MANAGEMENT COMMITTEE/
INTEGRATED WASTE MANAGEMENT TASK FORCE
900 SOUTH FREMONT AVENUE, ALHAMBRA, CALIFORNIA 91803-1331
P.O. BOX 1460, ALHAMBRA, CALIFORNIA 91802-1460
www.lacountyiswmtf.org

June 30, 2008

Mr. Dave Hauser
General Manager
Browning-Ferris Industries
14747 San Fernando Road
Sylmar, CA 91342-1091

Dear Mr. Hauser:

FINDING OF CONFORMANCE—SUNSHINE CANYON LANDFILL (CITY/COUNTY PROJECT)

On May 21, 2008, this office received a Finding of Conformance application for the proposed Sunshine Canyon Landfill (City/County Project) from Browning-Ferris Industries of California, Inc. (BFI). We reviewed the document in accordance with the requirements of Chapter 10 of the Los Angeles County Countywide Siting Element (approved by the California Integrated Waste Management Board on June 23, 1999), and the Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force guidelines which were discussed during consideration of the Sunshine Canyon Landfill-County Project. Based on staff's review of the application, the application has been deemed incomplete for the following reasons:

1. BFI must provide evidence that it has obtained approval from the Los Angeles County Department of Public Works for a combined "City/County Project" Fill Sequencing Plan for that portion within the County's jurisdiction.
2. BFI must provide evidence that it has obtained Los Angeles City's approval/determination to proceed to Phase II of the City Landfill.

Mr. Dave Hauser
June 30, 2008
Page 2

3. In Section 5, Waste Material to be Handled, BFI stated that "Consistent with its Waste Discharge Requirements, Sunshine Canyon Landfill accepts contaminated soils for disposal or use as daily cover in lined areas of the site." However, the use of contaminated soil for daily cover is prohibited by the City and County's Land Use Permits

We anticipate scheduling your request for the July 2008 Task Force agenda. We request that you provide the above information prior to July 7, 2008, in order for staff to finalize the staff report and submit to the Task Force for consideration at its July 17, 2008 meeting.

If you have any questions, please contact Mr. Martins Aiyetiwa of this office at (626) 458-3553, Monday through Thursday, 7 a.m. to 5:30 p.m.

Sincerely,

DEAN EFSTATHIOU, Chairman
Los Angeles County Solid Waste Management Committee/Integrated Waste Management
Task Force



FRED M. RUBIN
Assistant Deputy Director
Los Angeles County Department of Public Works

LL:cw
P:\Sec\FOC Application Combined Landfill_pa.doc

Enc.

cc: Each Member of the Los Angeles County Solid Waste Management
Committee/Integrated Waste Management Task Force

4. Project Design Capacity

The total design capacity of the City/County Landfill is estimated to be 141.2 million cubic yards, of which approximately 50.7 million cubic yards is presently permitted in the existing City and County landfills. Thus, approval of the City/County Landfill will add approximately 90.5 million cubic yards of permitted capacity to the facility. The total estimated amount of solid waste to be disposed in the City/County Landfill is approximately 91.1 million tons.

5. Waste Material to be Handled

The waste types received at SCL consist of non-hazardous residential, commercial, and inert/exempt waste classified in accordance with 27 CCR, Sections 20220 and 20230, defining Class III and inert wastes. The municipal solid waste categories are described as follows:

- Mixed Municipal Solid Wastes (including commercial and residential waste);
- Non-hazardous industrial wastes (except those having high liquid content [>50 percent liquid by weight]); and
- Construction/Demolition wastes that may be disposed of or are beneficially used and not disposed in the landfill; and
- Green Wastes that are beneficially used and not disposed in the landfill.

Typical residential non-hazardous solid waste includes, but is not limited to, household refuse, tree and lawn clippings, leaves and brush, scrap lumber and metal, appliances, furniture, wood chips, plastic containers, newspapers, cardboard and glass containers. Commercial and industrial waste typically includes, but is not limited to, food wastes, paper, corrugated cardboard, plastic, rubber, glass, mixtures of concrete, asphalt, wood, steel, brick and block.

Universal wastes (fluorescent lamps, CRTs, instruments that contain mercury, batteries, and electronics) are prohibited for disposal at the site. SCL also does not landfill compostable material (other than incidental compostable material mixed with other landfilled loads) as defined in 14 CCR, Section 17850 as "any organic material that when accumulated will become active compost as defined in 14 CCR, Section 17852(a)(I)" nor does SCL accept biosolids, untreated medical waste or asbestos wastes.

The site may accept up to 6,600 tons per week of total exempt clean soil and waste for beneficial use (e.g., asphalt rubble and processed green material).



May 21, 2008

Mr. Martins Aiyetiwa
Los Angeles County
Department of Public Works
900 South Fremont Street, Annex Third Floor
Alhambra, CA 91803

**Subject: Finding of Conformance Proposal for the Sunshine Canyon City/County
Landfill**

Dear Mr. Aiyetiwa,

Please find attached a copy of the Finding of Conformance Proposal for the Sunshine Canyon City/County Landfill dated May 2008 prepared by A-Mehr, Inc.

If you have any questions, please do not hesitate to call me at (818) 833-6514, Susan.Jennings@awin.com or Dave Hauser, General Manager, at (818) 833-6511, Dave.Hauser@awin.com.

Sincerely,

A handwritten signature in black ink that reads "Susan Jennings". The signature is written in a cursive, flowing style.

Susan Jennings
Environmental Manager

Attachment: 3 Copies

Sunshine Canyon Landfill
14747 San Fernando Road, Sylmar, CA 91342
Phone 818-833-6500 Fax: 818-362-5484