California Environmental Protection Agency

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California Governor

Department of
Resources Recycling and Recovery

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Secretary for Environmental Protection
Rachel Machi Wagoner
CalRecycle Director

January 12, 2024 *Via Email:kgork@ph.lacounty.gov*

Karen Gork
Chief Environmental Health Specialist
Los Angeles County Department of Public Health
5050 Commerce Drive
Baldwin Park, California 91706

Subject: Chiquita Canyon Landfill (19-AA-0052) Review - Mitigation Measure #2A, Use of Pressure Relief Valves

Dear Mrs. Gork:

CalRecycle staff are providing this letter in response to your Dember 29, 2023, request for technical assistance in reviewing Chiquita Canyon Landfill's (CCL) proposed use of pressure release valves (PRVs) embedded in the geomembrane cover.

The following comments are provided to the Los Angeles Local Enforcement Agency (LEA) as assistance to support the program in carrying out its responsibilities on permitted disposal sites. The final determination as to the comments to be provided to the responsible party is within the sole purview of the LEA, acting within the parameters of its discretion, in accordance with its vested authority under its certification as defined in Title 14, California Code of Regulations (14 CCR), Division 7, 27 CCR, Division 2, Subdivision 1 (Section 20005 et seq.), and Division 30 of the Public Resources Code.

After a review of the NSPS and NESHAP Reports for the previous 18 months, approximately 85 percent of the recorded landfill gas (LFG) collection system shutdowns are less than 4 hours in duration. The proposed PRVs are a mitigation measure to prevent the accumulation of landfill gas (LFG) under the geomembrane and the uncontrolled release of landfill gas when the LFG collection system is inoperative for a significant period of time. The proposed PRVs will release LFG and odors through a non-destructive passive system.

The potential release of LFG at ground level is a threat to employees in the immediate area and will not control odors nor emissions of toxic compounds. It is imperative that LFG not be released unabated to the environment.

Since the landfill has two permitted operational flares, the LEA should consider requiring the CCL to add a junction and valves to remove the LFG under the geomembrane to an operating flare. The remaining flare can be cycled until the second flare is back online. If CCL determines that only using one flare will cause significant risk to the LFG system and/or geomembrane cover, CalRecycle recommends that the LEA require that CCL install a secondary flare and power unit or other acceptable abatement device as a backup. Alternatively, a thermal oxidizer or other LFG control device could also be utilized to properly control the LFG. Additionally, CalRecycle recommends that the LEA consider recommending that the CCL install emergency generator(s) for the permitted flares to prevent LFG collection system outages related to power failures.

Please do not hesitate to contact me by telephone at (916) 341-6356 or by email at Todd.Thalhamer@Calrecycle.ca.gov if you have comments or questions.

Sincerely,



Todd Thalhamer, P.E.
Senior Waste Management Engineer
Engineering Support Branch

Cc Via Email:

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