



June 5, 2025

Ms. Nicole Stetson
Simi Valley Landfill and Recycling Center
2801 Madera Road
Simi Valley, CA 93065

**Local Enforcement Agency Approval – Modified Emergency Waiver of Standards –
Simi Valley Landfill and Recycling Center, 2801 Madera Road, Simi Valley, CA
93065 (SWIS No. 56-AA-0007)**

On November 22, 2024, the Environmental Health Division (Division) as the Local Enforcement Agency (LEA) received a written request from Waste Management Inc., (WM), owner and operator of the Simi Valley Landfill and Recycling Center (SVLRC), for an Emergency Waiver of Standards (Waiver) pursuant to California Code of Regulations Title 14 (14 CCR), Section 17210.3. The request was in response to the State of Emergency (SOE) declared by the Governor due to the Mountain Fire which began on November 6, 2024, in Ventura County. The Waiver was approved by the Division and commenced November 26, 2024.

On January 16, 2025, the Division received a revised written request from WM pursuant to 14 CCR, Section 17210.3, for the Waiver to include the multiple fires occurring in Los Angeles and Ventura Counties (including the Palisades, Eaton, Hurst, Lidia, Sunset, and Woodley Fires), which were declared a SOE by the Governor on January 7, 2025. WM's revised request referenced the seven Executive Orders (EO) issued by the Governor after the Palisades SOE; specifically, EOs N-2-25 and N-5-25, which mandate the prompt removal of debris resulting from the fires to mitigate the potential for mudslides and flood risks.

The Emergency Waiver is approved with the following modifications:

- The SVLRC may accept disaster debris generated from residential properties destroyed in the Los Angeles Fires and the Mountain Fire.
- The Emergency Waiver is in effect for 90 days, through September 3, 2025.
- This Emergency Waiver allows SVLRC to increase weekly tonnage from 64,750 tons per week to 134,750 tons per week and unlimited daily tonnage. This

provides flexibility for daily operations but does not exceed weekly limits during the duration of the Waiver.

- This Emergency Waiver allows SVLRC to increase maximum daily vehicle trips from 1,128 vehicles per day to 1800 vehicles per day during the duration of the Waiver.
- This Emergency Waiver allows operation from 4:00 am to 12:00 am, seven days a week for all operations during the duration of the Waiver. Disaster debris vehicles that arrive outside this window due to unforeseen circumstances will be accepted to avoid putting the vehicles back on the road. The Division will be notified on the next operating day if landfill operations occur outside the Waiver hours.
- On November 7, 2024, the Governor proclaimed a SOE existed in Ventura County for the Mountain Fire as defined in 14 CCR, Section 17210.1(k).
- On January 7, 2025, the Governor proclaimed a SOE existed in Ventura and Los Angeles Counties for the multiple fires, including Palisades and Eaton Fires, and widespread windstorm conditions as defined in 14 CCR, Section 17210.1(k).
- SVLRC holds a valid Solid Waste Facilities Permit (SWFP) identified as SWIS No. 56-AA-0007. All other state minimum standards and permit conditions which are not subject to the Emergency Waiver shall remain in effect.
- The LEA's approval of this Emergency Waiver for residential disaster debris only, increased daily and weekly tonnage and vehicle trips, and extended hours of operation, will not pose a threat to public health or the environment.
- SVLRC has identified, and to the extent feasible, will implement diversion programs to maximize diversion of disaster-related waste utilizing onsite C&D and organics recycling facilities.

Background:

- On March 17, 2025, the Division received a request from WM to revise and extend the Waiver pursuant to 14 CCR, Section 17210.3 with proposed limits on tonnage, vehicles, and hours of operation. The extension request anticipated disaster debris removal would be ongoing for 8-9 months; consequently, the Division approved the waiver extension through December 31, 2025.
- On April 30, 2025, the LEA issued an "Area of Concern" (14 CCR 20590) to SVLRC related to appropriate safety equipment for landfill staff working at the fire debris tipping area. The LEA has not received an evaluation or findings from WM H&S regarding appropriate PPE (respiratory protection) for this activity.

- On May 19, 2025, WM and the United States Army Corp of Engineers (USACE) presented at the City of Simi Valley City Council meeting, Agenda Item 3(b), to describe the disaster debris removal operations from the Los Angeles County fires, from which up to 70-80% of the disaster debris was projected to be disposed of at the SVLRC. Colonel Swenson of the USACE stated the disaster debris removal operation was ahead of schedule, with approximately 77% of residential properties from the Los Angeles County fires completed. Weekly disaster debris reporting from the SVLRC, dated June 1, 2025, confirms that incoming disaster debris tonnage and truck trips have declined over the past three weeks and are trending downwards.
- To date, WM has accepted disaster debris from residential properties only, in accordance with the USACE's March 6, 2025, Debris Removal Operations Plan (DROP) Private Property Debris Removal Palisades Fire Location and USACE's March 8, 2025, DROP Private Property Debris Removal Eaton Fire Location. WM has stated the SVLRC has not accepted disaster debris from commercial properties affected by the Los Angeles County fires.
- The Division's review of the USACE's May 14, 2025, DROP Eligible Non-Residential Property Debris Removal (ENRPDR), Wildfire Response Debris Removal Support, Los Angeles County, CA, identified significant deficiencies including the lack of additional waste characterization for commercial properties. The deficiencies were described in the Division's May 20, 2025, email to WM.
- The USACE's ENRPDR does not provide adequate detail to ensure that RCRA waste and California hazardous waste is excluded from the fire debris and ash waste stream prior to disposal at the SVLRC.

Consequently, the LEA could not make the finding that the waiver would not pose a threat to public health and safety or the environment without modification.

Pursuant to 14 CCR, Section 17210.4(a)(2), the EA may grant a waiver during proclamation of emergency upon making the finding that the waiver will not pose a threat to public health and safety or the environment. Furthermore, 14 CCR, Section 17210.2(f)(1), states an Emergency Waiver may be modified, canceled, or revoked by the EA without advance notice should the EA determine that the use of such a waiver will cause or contribute to a public health and safety or environmental problem.

Within 90 days from the date of issuance of this Emergency Waiver and every 90 days thereafter for the effective period of the Waiver, the SVLRC shall submit a report to the Division in accordance with 14 CCR, Section 17210.5. Reporting Requirements for a Solid Waste Facility Operator.

If you have any questions, please contact Gina Libby at Gina.Libby@ventura.org or 805-654-2859.



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