



April 12, 2020

Mr. David Carmany
City Manager, City of West Covina
Via email

Dear Mr. City Manager:

What emergency plan(s) does the City of West Covina have in place for the landfills at BKK?

The Covid19 situation has brought with it questions and concerns about preparedness for other emergencies - preparedness not only by individuals, but also by the cities that we live in and depend on; cities that have promised to protect their residents.

As you are already aware West Covina's BKK includes a massive toxic hazardous waste landfill (a Class I landfill):

- It is California's largest toxic hazardous waste landfill covering 195 acres of land and is up to 595 feet deep.
- According to the U.S. Environmental Protection Agency it contains 3.9 million tons of hazardous waste such as acids, arsenic, cyanide, lead, mercury, asbestos, chromium, degreasing agents, oil sludge, gasoline, pesticides, vinyl chloride, plating solutions, acetone, heavy metal solutions, pharmaceuticals, hazardous spills cleanups, paint waste, and polychlorinated biphenyls (PCBs).
- Almost all of the hazardous waste dumped at BKK was liquid, dumped directly on to the dirt or injected in the ground.

As you are also aware, the Class I landfill at BKK is unlined. Physical barriers were not placed at the bottom and or on the sides of the landfill to prevent the migration of hazardous liquids and gases from the landfill into residential and commercial areas that surround BKK. For example, according to the recently published 2017 BKK Annual Groundwater Report contaminated groundwater, unmistakably from BKK, is now detectable in the residential area southwest of the McDonald's restaurant at the corner of Azusa Ave and Amar Road¹.

The other landfill at BKK is a Class III landfill. It also contains toxic hazardous waste, but primarily consists of 20 million tons of decomposing municipal trash. This massive volume of trash produces enough landfill gas to run, on virtually a continuous basis, a 7,000-kilowatt electricity generating plant. The landfill gas also contains known carcinogens such as vinyl chloride and some leaks from the landfill have exceeded regulatory limits².

BKK is an "on-going public health threat."³ Presently safety at and around BKK depends primarily on three systems: The groundwater monitoring and extraction wells and piping, the landfill gas monitoring probes and extraction wells and piping, and the caps and covers on both landfills.

These are physical systems, operated and maintained by human beings. Like all systems, these systems are subject to failure⁴ and the human beings performing

¹ In a different area, evacuations of residents had to be conducted in 1984, the result of high levels of vinyl chloride and methane seeping from BKK into homes.

² Letter from the California Department of Resources Recycling and Recovery to the City of West Covina dated August 30, 2019

³ Letter from the California Department of Toxic Substances Control to the City of West Covina dated January 30, 2020

⁴ The routine maintenance reports for BKK demonstrate increasing failure rates and maintenance of the groundwater and gas systems as they reach and exceed their service lives.

operations and maintenance are subject to making mistakes. Both are entirely foreseeable.

What emergency plan(s) does the City of West Covina have in place for the landfills at BKK?

Thank you,

A handwritten signature in black ink, appearing to read 'Brian Jobst', with a large loop at the bottom.

Brian Jobst
Co-founder, Livable West Covina
www.LivableWestCovina.org

Cc: West Covina Assistant City Manager, Mark Persico
West Covina Planning Director, Jeff Anderson
West Covina Economic Development Director, Paulina Morales
West Covina Police Chief, Richard Bell
West Covina Fire Chief, Vincent Capelle
West Covina Mayor, Tony Wu
West Covina Mayor Pro Tem, Letty Lopez-Viado
West Covina Councilman, Dario Castellanos
West Covina Councilman, Lloyd Johnson
West Covina Councilwomen, Jessica Shewmaker
West Covina Planning Commissioner, Sheena Heng
West Covina Planning Commissioner, Donald Holtz
West Covina Planning Commissioner, Gregory Jaquez
West Covina Planning Commissioner, Glenn Kennedy
West Covina Planning Commissioner, Herb Redholtz
United Walnut Taxpayers
West Covina Improvement Association
Sierra Club San Gabriel Valley Task Force
Sierra Club Angeles Chapter
San Gabriel Valley Progressives