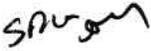
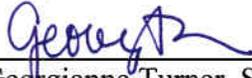


Waste Permitting, Compliance and Mitigation Division
ACTION REQUEST

To: 
Mark De Bie, Deputy Director
Waste Permitting, Compliance and Mitigation Division

Through: 
Lorraine Van Kekerix, Branch Chief
Waste Evaluation and Enforcement Branch

From: 
Georgianne Turner, Section Manager
Solid Waste Enforcement Section

Request Date: May 29, 2012

Action By: June 8, 2012

Decision Subject: Consideration of Approval of Final Report for the Ongoing Use of Mixed Glass Fines as an Alternative Daily Cover at the City of Paso Robles Landfill, Facility No. 40-AA-0001

SUMMARY

CalRecycle is acting as the enforcement agency (EA) for San Luis Obispo County. As part of the duties, CalRecycle is responsible for approving Alternative Daily Cover (ADC) Demonstration Projects for landfills within the jurisdiction. On June 3, 2010, the operator submitted a "Project Description Additional Alternative Daily Cover Material Mixed Glass Fines As ADC, Pilot Study Paso Robles Landfill." On September 15, 2010, CalRecycle approved the demonstration project with further clarification and conditions. Due to the limited availability of the mixed glass fines, a six month extension to the demonstration project was granted on October 21, 2011, in order for the operator to further evaluate the performance of the mixed glass fines as an ADC. On April 18, 2012, CalRecycle received a copy of the "ADC Demonstration Project, Mixed Glass Fines, Paso Robles Landfill", dated April 17, 2012, which is considered the final report documenting the observations made by the operator.

OPTIONS

1. Approve the Final Report for Mixed Glass Fines as Alternative Daily Cover at the City of Paso Robles Landfill, Facility No. 40-AA-0001.
2. Deny the Approval of the Final Report for Mixed Glass Fines as Alternative Daily Cover at the City of Paso Robles Landfill, Facility No. 40-AA-0001.
3. Approve, with additional conditions, the Final Report for Mixed Glass Fines as Alternative Daily Cover at the City of Paso Robles Landfill, Facility No. 40-AA-0001.

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ANALYSIS AND FINDINGS

Background

If a landfill operator proposes to use an ADC material not identified in Title 27, California Code of Regulations (27 CCR), Section 20690(b)(1-11), they are required to propose a site specific demonstration project and receive approval for the demonstration project from the EA to establish that the material is suitable as daily cover. During the demonstration period, the EA and operator evaluate the proposed ADC material to determine if the material controls vectors, fires, odors, blowing litter and scavenging. The cover performance standards of 27 CCR 20695 may be used by the EA when evaluating the adequacy of the ADC during the demonstration project. At the conclusion of the demonstration project, the operator prepares a final report providing a summary of the demonstration project and conclusions as to the suitability of the ADC materials. The final report is submitted to the EA and CalRecycle for approval and concurrence. If the new material is approved and the operator plans to continue the use of the material, the operator will submit an application to amend the Report of Facility Information (RFI) for processing by the EA pursuant to 27 CCR 21665, prior to its continued use. On some occasions, other permitting requirements may apply based on the RFI amendment and revised operations.

Analysis

CalRecycle staff received and reviewed the "Project Description Additional Alternative Daily Cover Material Mixed Glass Fines As ADC, Pilot Study Paso Robles Landfill" dated June 3, 2010. The project description proposed the use of mixed glass fines to be utilized as ADC. The use of mixed glass fines as an ADC is not currently allowed by 27 CCR 20690(b)(1-11). On September 15, 2010, CalRecycle approved the ADC demonstration project. On October 21, 2011, a six month extension to the demonstration project was granted in order for the operator to further evaluate the material's performance as an ADC. In addition to conducting the demonstration project as described, the City of Paso Robles Landfill was expected to:

- Meet the cover performance standards (control vectors, fires, odors, blowing litter and scavenging) or revert to soil cover or previously approved ADC. The mixing or blending of the mixed glass fines with other approved ADCs is not allowed as part of the demonstration project. Mixed glass fines used as ADC will not be exposed for greater than 24 hours, and will not be applied during cover operations prior to closed days.
- Ensure that mixed glass fines received for use as an ADC are from processing facilities or operations that meet the specifications described in the demonstration project (i.e., derived from a 3/8 inch screen, from by-product of glass recycling).
- Record inspections and observations on the Daily Performance Log sheets each day the mixed glass fines are used.
- At the conclusion of the demonstration project, submit a final report which summarizes the demonstration project and conclusions as to the suitability of the mixed glass fines to effectively control vectors, fire, odors, blowing litter, and scavenging without presenting a threat to public health, safety, and the environment. Following the demonstration project, if the operator proposes to use the mixed glass fines on a continuous basis as an ADC, an

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application for a Report of Facility Information Amendment must be filed with CalRecycle in accordance with 27 CCR 21570.

Evaluation Results

The operator submitted the final report which summarized the demonstration project and concluded that mixed glass fines were suitable to effectively control vectors, fires, odors, blowing litter, and scavenging without presenting a threat to public health, safety, and the environment. The demonstration included a total of 18 loads of mixed glass fines, each approximately 23 tons per load. All 18 loads were checked prior to use and none were rejected for use as ADC. Each load, after being placed on the active face, was inspected and a monitoring data sheet was used to track flies, mosquitoes, wasps, bees, cockroaches, rodents, birds, odor, litter, moisture content, fire potential and cover thickness. In all cases, the data sheets showed that none of these factors were observed. The observations showed that the material acted similar to soil/gravel and worked adequately with a six (6) inch thickness. A Scudder Fly Grill was used during most of the demonstration project monitoring period and observations showed no flies present.

The demonstration project occurred from September 15, 2011 to February 29, 2012. During this time, CalRecycle staff performed monthly inspections and verified that the operator was in compliance with the project description and the additional conditions given in the approval. Additionally, staff did not observe flies, mosquitoes, wasps, bees, cockroaches, rodents, birds, odor, litter, moisture content, or concerns of fire in relation to using the mixed glass fines as ADC.

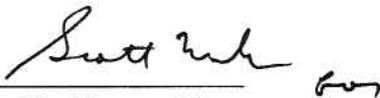
RECOMMENDATION:

Staff evaluated the project and determined that no additional demonstration is necessary and is recommending approval of the final report for the continued use of mixed glass fines as ADC at the facility after the proper permit approvals have been granted.

DEPUTY DIRECTOR ACTION:

On the basis of the information in this Request for Action, I hereby approve the final report of mixed glass fines as an ADC at the City of Paso Robles Landfill.

Dated: 7/17/12



Mark De Bie, Deputy Director
Waste Permitting, Compliance and Mitigation Division
Department of Resources Recycling and Recovery

