STATE OF CALIFORNIA GEORGE DEUKMEJIAN, Governor

CALIFORNIA WASTE MANAGEMENT BOARD
1020 NINTH STREET, SUITE 300
SACRAMENTO, CA 95814

Meeting of the
CALIFORNIA WASTE MANAGEMENT BOARD
Hearing Room
River City Bank Building
1020 Ninth Street, Suite 300
Sacramento, CA 95814

March 26-27, 1987

NOTICE AND AGENDA

Note: **The Board will convene at 10:00 a.m., March 26, 1987. This agenda represents the order in which items are scheduled to be considered. Since the Chairman, however, may change this order, participants and other interested parties are advised to be available during the entire meeting. Items not considered on March 26, may be continued until March 27, beginning at 9:00 a.m.**

If written comments are to be submitted to the Board, 15 copies should be provided.

		MINUTES
1.	UPDATE AND CONSIDERATION OF LEGISLATION	20
2.	CONSIDERATION OF CONTRACT FUNDS ALLOCATED FOR PUBLIC AWARENESS PROGRAM	20
3.	CONSIDERATION OF APPROVAL OF THE ALAMEDA COUNTY SOLID WASTE MANAGEMENT PLAN REVISION	40
4.	CONSIDERATION OF KERN COUNTY SOLID WASTE MANAGEMENT PLAN AMENDMENT NO. 6	15
5.	CONSIDERATION OF THE MODOC COUNTY SOLID WASTE MANAGEMENT PLAN REVIEW REPORT	15
6.	STATUS OF DELINQUENT COUNTY SOLID WASTE MANAGEMENT PLANS	10
7.	STATUS REPORT BY CONTRA COSTA COUNTY ON THE PROGRESS OF THE COUNTY SOLID WASTE MANAGEMENT PLAN REVISION AND LANDFILL SITING EFFORTS	20
8.	CONSIDERATION OF THE DETERMINATION OF CONFORMANCE AND CONCURRENCE WITH THE SOLID WASTE FACILITIES PERMIT FOR THE MARIN RECYCLING AND TRANSFER STATION, MARIN COUNTY	30
9.	CONSIDERATION OF THE APPROVAL OF THE REPORT TO THE LEGISLATURE, "WASTE-TO-ENERGY UPDATE 1987"	20
10.	CONSIDERATION OF THE APPROVAL OF THE REPORT TO THE LEGISLATURE CONCERNING SHREDDER WASTE	20
11.	CONSIDERATION OF ISSUING NOTICES OF THE BOARD'S INTENT TO ADD THE FOLLOWING FACILITIES TO THE STATE LIST OF NONCOMPLYING FACILITIES:	80

A. LANDERS DISPOSAL SITE, SAN BERNARDINO COUNTY
B. NORWALK DISPOSAL SITE, LOS ANGELES COUNTY
C. SAVAGE CANYON LANDFILL, LOS ANGELES COUNTY
D. SACRAMENTO CITY LANDFILL, SACRAMENTO COUNTY
E. SANTA CLARA LANDFILL, VENTURA COUNTY
F. CRAZY HORSE LANDFILL, MONTEREY COUNTY
G. HUNTER LIGGETT LANDFILL, MONTEREY COUNTY
H. FORT ORD LANDFILL, MONTEREY COUNTY

12. SELECTION OF CONTRACTOR FOR THE PREPARATION OF GUIDELINES FOR THE DESIGN, CONSTRUCTION, AND OPERATION OF LANDFILL LEACHATE AND GAS MONITORING AND CONTROL SYSTEMS — 20

13. UPDATE OF CALIFORNIA CURBSIDE RECYCLING PROGRAM STUDY — 20

14. VIDEOTAPE PRESENTATION OF PLASTICS RECYCLING PILOT PLANT — 10

15. CONSIDERATION OF CONTRACT FOR STATEWIDE RECYCLING STUDY — 15

16. CONSIDERATION OF UNITED STATES ENVIRONMENTAL PROTECTION AGENCY MUNICIPAL WASTE LANDFILL AND INDUSTRIAL SURVEYS — 15

17. CONSIDERATION OF RELATIONSHIP BETWEEN COLLECTION AND STORAGE PRACTICES IN RIVERSIDE COUNTY TO BOARD STATUTES AND REGULATIONS — 30

18. REPORT ON SIGNIFICANT STAFF ACTIVITIES — 10

19. REVIEW OF FUTURE BOARD AGENDA ITEMS — 5

20. OPEN DISCUSSION

21. JOINT MEETING WITH THE CALIFORNIA ENERGY COMMISSION — 120

22. ADJOURNMENT

Note: **The Board may hold a closed session to discuss personnel, as authorized by State Agency Open Meeting Act, Government Code section 11126(a), and litigation, pursuant to the attorney-client privilege, Evidence Code section 950-962, and Government Code section 11126(q).**

For further information contact:
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CALIFORNIA WASTE MANAGEMENT BOARD

Agenda Item # 2

March 26-27, 1987

Item:

Consideration of Contract Funds Allocated for Public Awareness Program

Issues:

- No proposals were received in response to the Board's 12/15/86 invitation for Bids (IFB) for media production services.
- Potential bidders responded that the IFB asked for too great a variety of products, was underfunded and too strict.
- American Consultants International has completed a draft script for a video documentary.

Background:

On December 15, 1986 the Board issued an Invitation for Bids (IFB) for the production of a variety of products, including: Radio and television public service announcements (PSAs), sound-synchronized slide shows and a video documentary. The January 9, 1987 bid deadline passed without a single response from the thirty-four (34) potential bidders. The Board's staff polled a number of the potential bidders to determine their reasons for not bidding. In summary, the reasons were:

Too many products. A number of the potential bidders said they felt that the products the Board requested were too varied for a single firm to produce; the small budget ($50,000) did not warrant the headaches of working with subcontractors to provide the full range of services the Board requested.

Budget too small. There was too much to do for so small a budget.

IFB too strict. Specifically with respect to the equipment requirements, the IFB was viewed as too restrictive; potential bidders felt that there should be greater flexibility allowed in the equipment used to produce the materials.

The Board's staff has been considering what approach to take to resolve these issues. Options include increasing the budget allocation, reducing the number and variety of products requested and separating the IFB into smaller, more distinct pieces.

American Consultants International (ACI), the Board's Southern California press/media consultant, has been working in cooperation with subcontractors to produce a script for the video documentary. A draft script was provided by ACI to the Board's staff on February 11, 1987. The staff has reviewed the draft script and believes that it provides a good basis from which to proceed with a documentary project.

A draft IFB for production of the video documentary only is attached for the Board's consideration. Like the earlier IFB for media production services, it would implement a contractor selection process which is a hybrid of proposal evaluation and low bid. A qualifications appraisal would be conducted to determine a list of qualified bidders; the contract would be awarded to the lowest qualified bidder.

The draft script produced by ACI is attached to the draft IFB as Exhibit A. Please note that Exhibit C to the IFB, which lists standard contact terms and conditions, is not included.

Recommendation:

It is recommended that the Board review the attached Invitation for Bids and direct the Chief Executive Officer to make appropriate revisions, and to advertise and distribute the IFB.

Attachments:

1. Draft Invitation for Bids for a Video Documentary

Invitation for Bids
Video Documentary

I. Introduction

The California Waste Management Board (Board) is the lead agency responsible for nonhazardous waste disposal in the state. Public awareness programs conducted by the Board must provide all segments of the public with accurate and consistent information about solid waste programs and facilities. The objectives of the Board's education and public information programs are: To inform the public about the environmental benefits of active enforcement of existing regulations; to improve public involvement in the decisionmaking process associated with the siting of solid waste facilities; to restore public confidence in the use of landfills and waste-to-energy plants for the disposal of nonhazardous solid waste; and to encourage public participation in recycling and litter control programs.

II. Purpose and General Requirements

The purpose of this Invitation for Bids (IFB) is, through a competitive selection process, to solicit bids for a non-exclusive contract to produce, edit and duplicate a video documentary for the California Waste Management Board.

Bid preparation costs shall not be reimbursed under this contract. Bids received within the prescribed deadline shall become the property of the Board and all rights to the content therein shall become the property of the Board.

Confidential Information: Prior to award of the contract, all bids will be designated "confidential" to the extent permitted by the California Public Records Act (Government Code Section 6250 et seq.). After award of the contract, copies of all responses and evaluations will be regarded as public records and will be available for review by the public at the Board's offices. Any bid which contains language purporting to render all or part of the bid confidential shall be regarded as non-responsive to the IFB, and the bid will be rejected.

III. Small Business Preference

NOTICE TO ALL BIDDERS: Section 14835 et seq., of the California Government Code requires that a five percent preference be given to bidders who qualify as a small business. The rules and regulations of this law, including the definition of a small business for the delivery of

services, are contained in Title 2, California Administrative Code, Section 1896 et seq. A copy of the regulations is available upon request from the State Office of Small and Minority Business. To claim the small business preference, which may not exceed $50,000 for any bid, your firm must have its principal place of business located in California and be verified by the State Office of Small and Minority Business. Questions regarding the preference approval should be directed to that office at (916) 322- 7122.

IV. Description of Work

A. Tasks

The selected contractor shall finalize the script under direction from the Board; and produce, edit and duplicate a broadcast-quality, 30-minute made-for-television documentary about California's waste management strategy, and State and local efforts to plan, site, permit and regulate safe waste disposal facilities. The **Draft Script**, attached as Exhibit A, shall be used for the purpose of preparing the cost proposal required in section VI.A.1., below. A total of thirty (30) video tape duplicates shall be provided: ten (10) each in 1-inch, 3/4-inch and 1/2-inch (VHS) formats.

B. Budget

The contract for this project shall be awarded on a low-bid basis. In no case shall the contract award exceed $30,000. Funds shall be allocated from the Board's 1986-87 budget, pending selection of a contractor and subject to the availability of funds.

C. Term

The term of the agreement for these services shall be one (1) year, commencing on the date of approval by the Department of General Services.

V. Deadline

All bids must be received (NOT POSTMARKED) by **no later than 4:45 P.M. on May 25, 1987** and addressed to:

California Waste Management Board
ATTN: Chris Peck, Communications Advisor
1020 Ninth Street, Suite 300
Sacramento, CA 95814

Bids received after the above time and date will not be considered and will be returned unopened to the bidder.

VI. Minimum Bid Requirements

FULFILLMENT OF ALL MINIMUM BID REQUIREMENTS MUST BE DEMONSTRATED IN WRITING.

A. Procedure for Preparing Bids

Each bid shall contain, in writing, as a minimum:

1. Format and Content

Bid price and cost information must be prepared by submitting the information requested on Exhibit B, **Bid Price and Cost Proposal.** The Bid Price and Cost Proposal must be placed in a SEPARATE, SEALED ENVELOPE, clearly marked **"Bid Price and Cost Proposal."**

All travel and per diem costs associated with location shooting will be reimbursed according to the rates established in Title 2, California Administrative Code, Sections 599.619 and 599.631 (quoted in Exhibit D to the sample standard contract form attached to this IFB as Exhibit C).

2. Identification of Prospective Contractor

The bid shall include the name of the firm submitting the bid, its mailing address, telephone number, and an individual to contact if further information is desired.

3. Nondiscrimination

The prospective contractor must be an Equal Opportunity Employer and must be willing to comply with State Fair Employment Practices. The signature of and date affixed by the prospective contractor on the Cover Letter required by Section VI.A.4., below, shall constitute a certification under penalty of perjury under the laws of the State of California that the bidder has, unless exempted, complied with the nondiscrimination program requirements of Government Code Section 12990, and Title 2, California Administrative Code, Section 8103.

4. Cover Letter and Signature

A cover letter, which shall be considered an integral part of the bid, shall be signed by an individual(s) who is(are) authorized to bind the bidder contractually. This cover letter must indicate the title or position which the signer holds in the bidder's firm. The letter shall contain a statement to the effect that the bid is a firm and irrevocable offer for a 90-day period. The bid shall also provide the following: name, title, address, and telephone number of individuals with authority to negotiate on behalf of and contractually bind the company. This letter, as required by the paragraph VI.A.3., above, constitutes certification by the bidder, under penalty of perjury, that the bidder complies with the California State Nondiscrimination Program requirements. An unsigned bid, or one signed by an individual not authorized to bind the bidder shall be rejected.

5. Copies

Thirteen copies of the bid package and one copy of the portfolio required in section VI.B.5., below, must be submitted in a sealed envelope marked with the bidder's name and address and the following statement:

"IFB -- DO NOT OPEN UNTIL 4:45 P.M., May 25, 1987"

One unbound, reproducible copy of the bid package shall be clearly marked **"MASTER"**.

6. Small Business Preference

If the bidder is claiming the Small Business Preference, he or she must clearly state in the Cover Letter required in subparagraph VI.A.4., above, that he or she is claiming the preference. The bidder must also furnish the Small Business Certification Number.

B. Other Minimum Requirements

1. Experience

The project director shall have a minimum of five (5) years experience directing television or educational video production. If a subcontractor will be responsible for

the production of any part of the Board's project, then the subcontractor shall also possess an equivalent amount of experience in his or her field.

2. Description

The bid shall include a written description of all activities and production time schedules required to complete the documentary.

3. Facilities and Equipment

Each bid shall list the facilities and equipment necessary to produce, edit and duplicate the video documentary, and demonstrate in writing the bidder's ownership or access to such equipment. ANY BID WHICH DOES NOT DEMONSTRATE SUCH OWNERSHIP OR ACCESS SHALL BE DISQUALIFIED.

4. Subcontracts

If any subcontractors are to be used, the bidder must submit a complete description of each person or firm, the work to be done by each subcontractor, the cost of the work, and a sample of similar work completed by the proposed subcontractor. All subcontracts must be approved by the Board, and no work may be subcontracted without the prior approval of the Board. In addition, the bidder must indicate the cost of any subcontracts and any markup that the bidder plans to take on subcontracts.

5. Portfolio

Each proposal shall include a minimum of one (1) example, reproduced on 3/4-inch video tape, of similar work produced by the bidder. Each sample shall be accompanied by a cost-accounting which indicates the actual cost to produce the example. The portfolio and accompanying cost-accounting information shall be used to correlate product cost and quality during the evaluation phase in order to demonstrate the bidder's ability to produce such products at a cost within the Board's budget.

6. Client References

Each bid shall include a minimum of three client references for projects of similar scope and budget which describe the bidder's technical capabilities, production efficiency and budget control.

VII. Evaluation and Selection

A. Failure to Fulfill Minimum Bid Requirements

All bids will be reviewed to determine which bids meet the Minimum Bid Requirements contained in Section V. Failure to meet or demonstrate meeting the Minimum Bid Requirements will be grounds for rejection without further consideration. The State may reject any bid if it is conditional, incomplete or contains irregularities. The State may waive an immaterial deviation in a bid. The State's waiver of an immaterial defect shall in no way modify the IFB documents, or excuse the bidder from full compliance with the contract requirements if the bidder is awarded the contract. Failure to clearly state in the Cover Letter that the bidder is claiming the Small Business Preference will result in the bidder not being given the preference.

B. Contractor Selection

1. Evaluation Committee

Each bid which meets the Minimum Bid Requirements enumerated in Section VI, above, will be evaluated and scored by a Evaluation Committee. This committee may be composed of either staff, or Board members, or staff and Board members or the Board, sitting as a Committee of the Whole. The Evaluation Committee will score each bid using the **Qualifications Appraisal Rating Sheet** attached as Exhibit D. This rating sheet was specifically designed to judge the suitability of prospective contractors responding to this IFB.

The scores of the Evaluation Committee will be combined and averaged. Each bid receiving a minimum averaged score of 25 points from the Evaluation Committee will be recommended to the Board as qualified bidders.

If the Board sits as a Committee of the Whole, this part of the Selection Process will be combined with "Board Action," paragraph VII.B.3, below.

2. Interview for Clarification

Bidders who meet the Minimum Bid Requirements set forth in Section VI, above, may be asked to present themselves for an interview with staff or Board Members to clarify their bids. This interview may occur at any time during the bid evaluation process. The purpose of this interview will be for clarification only; no bidder will be allowed to alter his or her bid or add new information. Any attempt on the part of the bidder to do so will result in the disqualification of that bidder.

3. Board Action

The Board, at its next available regular meeting, will then vote to accept or reject the Evaluations and Scores of the Evaluation Committee and select the qualified bidders. In either case, the Board, by a majority of those present will adopt one series of Evaluations and Scores for the bids in order to select the qualified bidders.

a. The Board may adopt, as its own, the Evaluations and Scores of the Evaluation Committee.

b. If the Board does not accept the recommendation of the Evaluation Committee it may adopt its own Evaluations and Scores to select the qualified bidders. Such Evaluations and Scores may include the adoption for some bids of the same total scores as those given by the Evaluation Committee. Such Evaluations and Scores may also include the adoption for some bids of scores which differ from those recommended by the Evaluation Committee.

4. Award of Contract

SEPARATE sealed envelopes, containing the Bid Price and Cost Proposal will be opened for those qualified bidders selected in accordance with the procedures described in Section VII.B., above.

The contract will then be awarded to the lowest qualified bidder. Consideration will be made for the Small Business Preference as stated in Section III, above.

5. Notice of Award

Notice of the proposed contract award will be posted in the Board's Sacramento offices for five business days, beginning on June 19, 1987. The award will be deemed final and the contract will be executed on or after the sixth business date after the above date.

C. Evaluation Criteria

All proposals meeting the Minimum Bid Requirements will be evaluated and scored in accordance with the procedures and methods described in Section VII.B., using the criteria listed below and incorporated in the Qualifications Appraisal Rating Sheet (see Exhibit D).

1. Quality

The portfolio shall be examined to determine the bidder's ability to produce a broadcast-quality documentary.

2. Cost correlation

The bidder's capability to deliver a broadcast-quality documentary within the project budget will be evaluated based on the cost-accounting information submitted with the portfolio.

VIII. Schedule for Award of Contract

April 27, 1987	Invitation for Bids advertised in State Contracts Register.
May 25, 1987	**Bids must be received by 4:45 p.m.** Bids will be opened and evaluation will begin.
June 18-19, 1987	Determination of lowest responsible bidder. Posting of award of contract.
June 26, 1987	Award of contract final. (Sixth business day following June CWMB meeting).

IX. Limitations

A. Amendments

The State reserves the right to amend this IFB by addendum prior to the final date of bid submission.

B. Information

All information obtained or produced during the course of work shall be made available to the Board for its use as it may so determine.

C. Commitment

The IFB does not commit the State of California or any of its agencies, departments or divisions to award a contract, to pay any costs incurred in preparation of a bid responding to this IFB, or to procure or contract for services or supplies.

The Board reserves the right to accept or reject any or all bids received as a result of this IFB, to negotiate with any qualified source, or to cancel in part or in its entirety this IFB, if it is in the best interests of the State of California to do so.

If the selected bidder fails to negotiate a satisfactory contract with the Board within a reasonable time after the award, the Board may offer to negotiate with the next runner-up, without further advertising, issuance of another IFB, or evaluation of bidders. The Chief Executive Officer shall determine when negotiations have broken down with the first selected bidder, and whether to offer to negotiate with the next runner-up.

This procedure shall apply to negotiations with lower-ranked runners-up in order of original ranking, if negotiations cannot be successfully completed with any bidder.

D. Termination

The Board has the authority and express right to terminate any contract awarded to the contractor(s) pursuant to the IFB at any time during the term of the contract for any reason or if the Board finds that the contractor's work is negligent, not satisfactory, or not in accordance with the

agreed upon work program. In the event of termination the contractor shall be entitled to payment for approved costs incurred prior to the effective date of termination.

X. Contract Terms and Conditions

A. State Contract Terms

Attached as Exhibit C is a copy of the major contract terms included in contracts executed by the State of California and this agency. The actual final terms of the contract to be awarded pursuant to this IFB, may differ from the example, so that the contract appropriately reflects the service and work to be purchased by the Board. The contract will provide for payment of actual work done and products provided. This may exceed or be less than the work projected in Exhibit B, Bid Price and Cost Proposal.

B. Contractor Evaluation

Within thirty (30) days after completion of work under this agreement the contractor's performance shall be evaluated by the Board and a report filed with the Department of General Services.

C. Payment

Contractor payments will be made in arrears, not more frequently than monthly.

PICTURE	NARRATOR (voice over)
TCU of claw working in dump. Hold on the unit as it swings high into the sky. FREEZE FRAME on the unit silhouetted against blue sky.	(MUSIC up and under. Happy sounds.)
	Eons ago our ancestors deserted
	their wandering, nomadic lifestyle...
Pan down to area outside of the landfill site, to a grassy field just beyond the fence. Zoom in to ETCU of blades of grass (tall, waving in wind, preferably golden colored).	
	and settled into communities.
Reverse zoom from grass and fade in series of still pix of grassland area dotted with trees and with a "timeless" quality. Super and Segue into still pix or early nomadic tribe on the move through similar grasslands.	MUSIC PROVIDES "BRIDGE" FOR PICS
	Their lives began to center around
	the hearth-fire
	rather than the
	camp-fire.
End this sequence with pix of early villages with people doing daily tasks which generate their version of "garbage." Include CUs of primitive versions of household items (which correlate to items found in use today).	They began to need, and to
	make,
	possessions.
	And they abandoned the luxury of
	moving to another location when their
TCU of a heap of these items in foreground, with early village OFF in background.	wanted possessions and the refuse
	of their daily activities...
	their "garbage,"
	dominated their landscape...
	something that modern Californians
	cannot do.

Pull back to shot of the dioramas in the Museum of Natural History in Los Angeles (or Carson City) which show adult ancient peoples and children involved in daily lives. Include in foreground heads and bodies of modern kids and adults "looking into the past."

And just as our ancestors finally found it necessary to establish places to dispose of <u>their</u> cast-off and used-up possessions...

Zoom in to ETCU of grass in background of the diorama scene. Fade to ETCU of same grass as in opening (just outside a landfill site).

so have we.

From top of frame, swiftly drop the claw into the pic, with the jaws opening. Follow the claw down as it grabs another load of materials and

And in so doing, we now find that we face.

FREEZE

(MUSIC UP AND UNDER)
(Strong, challenge, music)

SUPER TITLES

THE THIRTY-SIX-TONS-A-YEAR CHALLENGE

Main titles and brought-to-you-by credits

Remove freeze, hold on claw for a moment, pull back to show the landfill and other equipment working. Blade and face of person operating bull-dozer in background beyond the claw, move in and on through the area in a smooth zoom.

Each year in California over 36 million tons of solid waste materials are generated by our municipal and industrial activities.

Where does it come from?

Cut to establishing scene of parade of garbage trucks going into a landfill or a transfer facility (a good-looking area).	What is it?
	What must we do with it?
CU of sign to orient audience.	And whose responsibility is it?
Pull back and fade-in scenes responding to these questions	First...
	Where does it come from?
SUPER THE FIGURES	
1/3 1/3 1/3	It comes to the modern midden
over montage scenes showing:	heap as the result of the
	routine activities of our
Wrecking ball hitting cement wall; material flies into air.	daily lives.
	Approximately one-third of the
Woman at sink opening can of vegetables.	annual tonnage is made up of
	inert materials...
Child eating candy bar; throws wrapper into can.	for example, waste from
	construction...or building
Man drinking from beer can; throws it into trash receptacle.	demolition.
	One-third is organic matter
Couple buying groceries.	such as food waste, yard and
	garden materials and so forth.
Auto repair man opening can of oil.	And almost another third is
	inorganic matter...metal, plastic,
Office worker throwing paper into trash basket.	glass, and the like.
	MUSIC UP AND OVER, TO CARRY THE NEXT VISUALS
Person mowing lawn; stops to empty out the grass-catcher.	

Fade in shots of the landfill with zoom in to CU of dozer blade and materials FROM PREVIOUS MONTAGE cascading off the dozer blade.	What must we do to safely dispose of this mass of discarded materials?
CREATE A "RAIN" EFFECT, with the other materials as background to the items seen previously.	That's the challenge!
Fade back to shots of landfill activity; concentrate on "people" shots to emphasize human role.	It's a challenge facing every Californian, but especially those whose businesses are set up to manage the effective, efficient, and safe collection, storage, transportation, processing, and disposal of these tons of unwanted non-toxic materials.
Focus in on State personnel talking with manager of solid waste site; State vehicle or other easily identifiable element in shot.	Coordinating and monitoring these efforts is the challenge of the California Waste Management Board.
The two people are joined by a third, obviously not a government nor industry person, and together they walk away from the camera, further into the scene.	Working together individuals, industry and government have focused on three vital factors in the effort to adequately meet the needs of California for effective solid waste management.

MONTAGE:

Visuals change as appropriate to the text

Landfill

First...we have developed landfills to receive our discards. Called "sanitary landfills" because of the highly successful efforts which have been made to free these sites from toxic and other health hazards, these are the cornerstones of our solid waste management efforts.

SUPERS OVER SCENES:

LANDFILLS

Site shots

REDUCTION OF VOLUME

Some items in the site shots "disappear" from the scene (use movie "magic")

Second...we have developed methods to reduce the volume of solid waste which has to be disposed of in the landfills.

PLANNING AND SITING

Planning session or planners in field

Third...we have found ways to plan, and find appropriate locations for adequate solid waste disposal facilities.

WASTE-TO-ENERGY

A gas production/ conversion plant

There's a fourth element which we should not ignore:
Ways to safely and effectively convert solid waste materials to usable energy.

Roll the supers from top to bottom of screen, in a continuous pattern to emphasize the inter-locking of the elements

Fade-out fade-in the gas production/conversion scene to shots of people busy in urban settings

Include montage of

- busy downtown street
- residential area
- business complex
- industrial area
- children playing
- people eating
- people walking
- etc.

Superimpose map of state with landfill sites shown (over people-at-work-and-play scenes indicated above)

Let's examine each of these elements, one-by-one, in order to find the answer to that last most important question:

WHO IS ULTIMATELY RESPONSIBLE FOR THE SUCCESS OF POSITIVE SOLID WASTE DISPOSAL PROGRAMS IN CALIFORNIA?

We first must recognize the key fact that California's cities and counties have traditionally used the progressively more sophisticated, yet old-as-the-hills device of the sanitary landfill to meet their solid waste disposal needs.

Ninety percent of our solid disposables end up in landfills located from one end of California to the other.

Sanitary landfills, carefully managed, serve us well...and, although they are not necessarily the least costly method of solid waste disposal available to us, they are the building blocks upon which our programs rest.

Continue people shots, fade state map out	Typical problems associated with the improper use of landfills are being, for the most part, solved through a variety of creative approaches. New types of dump construction... restrictions on the types of materials which can be processed at a solid waste disposal sanitary landfill... frequent inspections... improved dump designs... and technological advances all are contributing to better facility utilization.
Public meeting scene	As citizens become more concerned and more involved in ensuring effective operation of landfills, these programs will continue to develop. And as existing landfills reach capacity and new sites are needed public participation in the planning process will help ensure the effectiveness of California's solid waste management program.

Fade in from public meeting to scenes at collection stations for recyclable materials.

Emphasize the human aspect:

Children with bags of cans they have collected alongside the road.

Senior citizens with newspapers.

Boy and Girl Scouts.

Sorting and organizing salvageable materials.

Transfering recyclables to a vehicle which will carry it to its destination.

Car pulls up, kids jump out and dump glass bottles and jars into appropriate "dome" collection stations.

Recovery and recycling are two key elements in the second of our essential strategies... Reduction of the amount of material which must be processed through our solid waste disposal programs.

By reducing the sheer volume of the problem, we also reduce processing costs... reduce the amount of material to be collected, transported, stored, and processed for final disposal... and free space in our much-needed landfills for other, non-recoverable materials.

Among the many recycling programs which are being encouraged and developed in California, the curb-side or parking-lot collection stations are gaining in popularity.

And as people recognize the need to recycle as much of our solid waste materials as possible...

Pan from the collection station to the supermarket in whose lot the station is located. Follow the children as they run into the store, and down an aisle.

Swing around and focus in on recycled products on the shelves...containers, etc.

Child's hand reaches up and removes package of stationery and envelopes from shelf. Flips it over so camera can show the "This product is made from recycled paper" symbol and words on the back.
Drops the package into a cart.

Another hand drops cans of soda into the shopping cart.

Kids pay for stationery at checkstand, pay for and pop open the soda cans.

MCU of kids faces as they take drinks from cans.

freeze
FREEZE ON THE FACES

SUPER

4 MILLION TONS

we need to focus our research and development energies on new uses for the recycled materials themselves.

We also need to become aware of where those products can be used, or are already in use, and increase public awareness of these benefits.

New ways of using our resources for a second, or a third, or even a fourth time...
the possibilities are exciting... and can prove profitable to those inventive people who become involved in this kind of resource conversation.
Right now over ten percent, 4 million tons, of our solid waste, is recycled into products which we can re-use.

And as California's Beverage Container Recycling Act is enforced, that tonnage will increase.

Shots of past recycling events sponsored by SWMB; "newsfilm" footage if possible	The bottom line for the success of recycling in California as a tool in management of our environment is people...they are the generators, and they are the solvers of the problem.
Reprise shots of materials at dump dump personnel in action woman at sink, man with lawn mower, child with soda can landfill site SUPER: Quad split with art work linkage	So...we've seen that <u>what</u> we must dispose of is inextricably linked to <u>who</u> must do the job of disposition... and <u>who</u> generates the need... and <u>where</u> we have found places to put it. Which brings us to the fourth element we mentioned... the need to develop and use ways to safely and effectively convert solid waste materials to usable energy.
"Explode" the quad split and art work into a scene in a research lab; technicians at work, etc.	The California Waste Management Board's Resource Conservation and Recovery Program not only focuses on the recovery and re-use of recyclable materials, as we've already seen...

	but also promotes resource recovery through research... waste-to-energy projects...
Continue laboratory shots	community assistance... litter control... and the development and implementation of programs to increase source separation, public awareness, and the markets for secondary materials...those recovered through the recycling process.
	And out of the research labs has come a concept that holds much promise for California, as it has proven to have in over 350 sites around the world...
SUPER: WASTE-TO-ENERGY	conversion of solid wastes to energy...
Shots showing uses of the energy generated from conversions	energy capable of running machinery... lighting cities and homes... and providing warmth... or cooling... when we need it.

"Laundry list" of proposed sites, SUPERED OVER PRECEDING SHOTS (MOVING)	Studies done in California show the potential for conversion of between 9 and 12 million tons of solid waste annually, at approximately 22 sites statewide.
SUPER END WITH 12 MILLION TONS	The majority of these plants would be located near sources of convertible materials, in the San Francisco Bay Area and the Los Angeles Basin.
Leave super on screen, fade-in shots of busy streets and people	
SUPER ONE-HALF THE SOLID WASTE TONNAGE	These waste-to-energy plants would have the capacity to process between one-third and one-half of the solid waste currently going to California's landfills.
Dissolve people scenes to City of Commerce facility with people working	
LOWER THIRD ID: CITY OF COMMERCE	Such a facility is under construction now in the City of Commerce...
Dissolve in shots of plant site in Long Beach	and another has been built in Long Beach.
LOWER THIRD ID: CITY OF LONG BEACH	Several other projects are close to completion of the development stages and could begin construction in the near future.
Same process for: CITY OF SUSANVILLE	

Fade in planning session shots	Before other plants can actually begin construction, however, the essential information about preservation of air quality... solid waste facility permits... land use conformance... non-hazardous waste approvals... and public and governmental concerns must be met,
People speaking at podiums, officials seated at Planning meetings listening to speakers	and at each step, the citizens of the surrounding areas can make sure of the plant's status as a "good neighbor" by getting involved in the planning process.
Conversations in lobby of meeting site; lots of people inter-action shots	
Dissolve to shots of landfill; "magic" the reduction of mass of materials (to show materials being taken out instead of put in)	At this time, people have developed, and accepted the use of a mass-burn technology to effect conversion of these tons of waste materials into usable energy.
Go to graphics showing technique used; SUPERED over landfill frozen frame from above shots	This has demosntrated a reliable performance record in other countries and in the United States.

SUPER NEW EXPLANATORY ART	Another technology which has proven effective, and which will be used at some of the California plants is that of a refuse-derived fuel production system...
SUPER NEW EXPLANATORY ART	yet another is "gasification"...
	and as new methods are developed they will be considered for use in California.
Fade-in pics of fields, grass-lands, residential lawns SUPER: LARGE-SCALE COMPOSTING	New technologies are also being developed for other elements in the solid waste management program...
Fade-in use-shots for compost	such as how to produce compost efficiently and economically, using the waste products from organic sources...and then, how this "new" organic product can be returned to a useful second "life".
SUPER: BIO-CONVERSION Fade-in appropriate pics	Bio-conversion is another method that will reap benefits for the Golden State...

Fade in people shots

SUPER:

SOURCE REDUCTION

And so is the idea of finding ways to alter production and consumption habits in order to reduce the quantity of wastes generated.

Begin reprise shots of kids collecting trash, people at work, woman in kitchen, man with lawnmower, etc.

These processes, like recycling, promise real benefits for the solid waste management programs managed by California's cities and counties.

We can successfully meet the challenge presented by our annual mountain of solid waste if we can:

Increase the useful life of our existing landfills...

Reduce the need for siting new landfills...

Make the most effective use of those landfills now in operation...

Conserve resources we are now losing...

Reduce the potential for environmental degradation...

Implement ways of converting waste to energy...

MCUs and TCUs of people's faces

and recognize that in order to do <u>any</u> of these things takes the involvement, cooperation, inventiveness, and commitment of <u>people</u>...

You...

your government...

...all of us, working together...

Although our waste disposal challenge is one of gigantic proportions...

EACH OF US CAN MAKE A DIFFERENCE.

This is our challenge...

and it is...

OUR RESPONSIBILITY.

Quad split montage of a landfill site with dozer working/technician in lab/ woman in kitchen/man and child in yard or on street in busy shopping area

MUSIC UP AND OVER

Bid Price and Cost Proposal

This Bid Price and Cost Proposal summary must be included in a separate, sealed envelope in accordance with Section V.A.2 of the Invitation for Bids. Additional cost data may be attached if necessary to detail the cost proposal.

	Cost	Subtotal
1. **Scripting**		
Personal Services	_____	
Equipment	_____	
Expenses	_____	_____
2. **Production**		
Personal Services	_____	
Equipment	_____	
Expenses	_____	_____
3. **Editing**		
Personal Services	_____	
Equipment	_____	
Expenses	_____	_____
4. **Duplication**		
Personal Services	_____	
Equipment	_____	
Expenses	_____	_____
5. **Overhead**	_____	_____
6. **Fee**	_____	_____

Total Project Cost

_____

Qualifications Appraisal Rating Sheet

1. Quality (0-20 Points)

   Do(es) the portfolio example(s) demonstrate the bidder's ability to produce a broadcast-quality product?

   _____

2. Cost-correlation (0-10 Points)

   Does the cost-correlation submitted with the portfolio demonstrate the bidder's ability to produce a product within the limitations of the Board's budget?

   _____

TOTAL SCORE (Maximum 30 Points)

_____

CALIFORNIA WASTE MANAGEMENT BOARD
AGENDA ITEM # 3
March 26-27, 1987

ITEM:

Consideration of the Alameda County Solid Waste Management Plan Revision.

(Held over from February meeting - documentation / analysis expanded.)

KEY ISSUES:

- Submittal document does not meet content requirements of Board's Plan Review Report. The document submitted only revises 1 of 5 Chapters and thus does not comply with the Plan Review Report approved by the Board.
- County hired consultant to prepare Plan Revision over 18 months, commencing in April, 1986.
- Submittal largely data update in tables and history of previous county actions.
- Submittal does not meet process requirements of Planning Guidelines and Government Code Section 66780.5 (No City and County approval, no formal Draft to Board for staff comment).

BACKGROUND:

This item was continued from the February, 1987, agenda at the request of the Alameda County to avoid their need to travel to Los Angeles to address the Board.

Alameda County, located on the east side of the southern San Francisco Bay, covers 735 square miles of land, 77 square miles of Bay and 13 cities. The population of Alameda County is 1,208,200.

About 1,802,000 tons of waste are generated in Alameda County and approximately 2,442,700 tons are disposed of within the landfills of the County. There are four landfills and three transfer stations in Alameda County to serve its needs for disposal of nonhazardous wastes. The amount of waste disposed in the County has significantly increased from the time of the 1980 Plan Revision. Much of this increase can be attributed to the acceptance of San Francisco's waste at the Altamont Landfill (630,000 tons per year), which began in 1983. There has also been a steady increase in waste volumes generated within the County, attributable to urbanization and population growth.

By statute, the Alameda County Board of Supervisors is responsible for solid waste planning and plan administration. This part of this responsibility was delegated through a Joint Exercise of Powers Agreement (JPA) to the Alameda County Solid Waste Management Authority. The Authority is composed of eighteen members, representing the County, cities and special districts. Planning and administrative support is provided by the County Planning Department and the Alameda County Health Care Services Agency.

The establishment and implementation of solid waste facilities are accomplished by the Authority, one of the member agencies of the JPA or by a private company. Facility proposals have to be found in conformance with the Facilities Plan of the CoSWMP before implementation. Conformance is determined locally by the Authority with final determination by the California Waste Management Board (CWMB). The Solid Waste Management Authority is empowered by the agreement "to make plans and conduct studies; to periodically review the Solid Waste Management Plan and recommend amendments thereto".

The joint powers agreement for solid waste planning also allows approval of changes to the facilities element of the CoSWMP by action of the Solid Waste Management Authority. Changes in solid waste programs and policies must be approved by the Board of Supervisors and the cities, as required by the Planning Guidelines.

The last Alameda County Solid Waste Management Plan (CoSWMP) Revision was approved by the Board on November 18, 1982. Prior to the third anniversary of Board approval of the Plan Revision, as required by Government Code Section 66780.5, the County of Alameda reviewed its Plan to determine its consistency with State Policy and to assess its need for a Plan Revision. On November 28, 1985, the County submitted the required Plan Review Report to the Board detailing the results of that Plan review.

In addition, the County requested additional time for Plan Revision preparation, through June, 1987. Staff recommended, and the Board concurred at the March, 1986, Board meeting, that this schedule was not appropriate. Neither the Government Code nor California Administrative Code regulations allow the Board to consider a request for such additional time.

ACTIVITIES SINCE THE PLAN REVIEW REPORT

A history of County, Board and Board Staff activities which set the groundwork for the submittal of the Alameda Plan Revision follows:

- March 20, 1986 — The Board accepted the Plan Review Report, subject to Board staff augmentation. This began the 270 day timeframe allowed by the Planning Guidelines for Preparing, Revising and Amending County Solid Waste Management Plans (Planning Guidelines), California Administrative Code, Title 14, Chapter 2, for

the preparation, local approval and submittal of County Solid Waste Management Plan Revisions.

- April 29, 1986 — CWMB Letter of Plan Report Approval requesting work program sent to Board of Supervisors and William Fraley, Planning Director and Secretary of the Alameda Solid Waste Management Authority.

- May 9, 1986 — Alameda County submits copy to CWMB of agreement with Plan Consultant.

- May 20, 1986 — Letter from Alameda County submitting formal timetable for Plan Revision "as agreed to with consultant", for 18.5 months.

- June 17, 1986 — CWMB staff letter stating work plan does not meet 270 day requirement and informing County that they are scheduled to present their case for a time extension at July 10-11, meeting.

- July 11, 1986 — William Fraley addresses CWMB regarding Plan Revision time needs of the County. No time extension granted. Board Chairman invites Fraley to join committee on Plan Revision time period.

- July 11, 1986 — Plan Amendments for Vasco Road and Altamont Landfills approved by CWMB. These are the most substantial facilities changes acknowledged in the new Plan Revision submittal, but are already part of the current Plan following the amendments.

- July 24, 1986 — Staff letter to County informing of Board denial of time extension, and unacceptable work plan. Letter requests Plan Revision work schedule, within 15 days, which meets the 270 day timeframe allowed by regulation. Sent Certified Mail.

- August 5, 1986 — Alameda County replies to CWMB staff, stating inability to change revision timeframe to comply with 270 days, due to consultant contract.

- August 5, 1986 — William Fraley replies separately, accepting position on the Board's Ad Hoc Committee on the CoSWMP Planning Process (committee work completed December, 1986.)

- September 12, 1986 — Staff letter to County restating need to comply with 270 day Revision requirement and that no appropriate time schedule has been submitted, and thanking Fraley for joining the Board's Ad Hoc Committee on the CoSWMP Planning Process

- November 2, 1986 — Draft Plan sent to "interested parties" by Authority. No formal Draft Plan transmitted to CWMB.

- November 7, 1986 — Negative Declaration for Plan Revision submitted to State Clearinghouse. CWMB staff made no comment since no substantive facility or program changes that had not been previously reviewed by the Board were included in the revision.

- December 19, 1986 — Authority sends response to Draft Plan comments to "interested parties" of the County Solid Waste Authority.

- December 19, 1986 — The Alameda County Solid Waste Management Authority submitted what appears to be the "final" Plan Revision. The Plan Revision includes the information submitted as the draft Plan, the comments submitted to the County on the draft by cities and other agencies, and the responses to these comments. The accompanying cover letter states that the enclosed document is submitted to comply with the 270 day time deadline. Reference made to a subsequent "comprehensive plan" and County procedure for this further revision activity. (Attachment 1)

STAFF ANALYSIS

Staff has reviewed the Plan Revision submittal by the County and finds it convenient to present analysis of this submittal in three sections as follows:

I. The County's Plan Revision Process activities,

II. A summary of the Revision content requirements and the activities completed, and

III. Staff's conclusions on the County's compliance with both of the above activities

I. PLAN PROCESSING ISSUES

Several requirements exist for the preparation and circulation of a Plan Revision prior to its submission to the CWMB for consideration. These requirements are contained in Chapter 2 of Title 14, CAC and paraphrased below. Relevant sections of the Board's regulations are cited in parentheses.

First, a draft Plan Revision must be sent to the incorporated Cities (17145), to the Regional Planning Agency (17148) and to the Board (17151) for comment.

The Draft Plan was circulated to the Cities and to the Association of Bay area Governments (ABAG), the regional planning agency. Board staff received a copy of this circulation as an "interested party" of the actions of Alameda Solid Waste Management Authority but there was no request or indication that this was intended as the formal Draft Plan Revision for Board staff comment.

The subsequent final Revision is required to be circulated to the Cities which are allowed 90 days to approve or disapprove the Plan Revision by resolution (17146, 17147). Approval of the Plan Revision must be by a majority of the Cities with a majority of the population. The final Plan must also be submitted to the Regional Planning Agency for comment (17149).

Following City approval of the Plan Revision, the final Plan must be approved by the County (17150). The County Board of Supervisors is then required to submit 20 copies of the Plan Revision, accompanied by copies of the cities resolutions and a tabulation of the populations of those cities verifying that a the required majority of the cities and the population were achieved (17152).

The final Plan was sent to the cities as a draft Plan with a separate comment and response document. Approval by the cities was not requested. A similar document was sent to ABAG.

The "revision" was heard twice before the Alameda Solid Waste Management Authority and approved by them. The document was approved by the Alameda Solid Waste Management Authority, rather than the Board

of Supervisors, since it was deemed by the Authority to be a facilities element amendment, which did not affect policy or other portions of the Plan. The delegation of authority on which the Authority based this approval is stated in the Background section above.

II. PLAN REVISION CONTENT SUMMARY

The content of this Plan Revision does not appear to meet either the requirements of the Planning Guidelines or the Board-accepted Plan Review Report.

A summary of the criteria set forth in the Plan Review Report is presented here with a brief status. These criteria are set forth in two sections:

A. Those changes to the Plan presented by the County in their Plan Review Report.

B. Those additional changes to the Plan identified by Board staff in their assessment of the County Plan and approved by the Board in March, 1986.

A. COUNTY REVISION PROPOSALS

PROPOSED CHANGE	CURRENT STATUS
Waste quantity data needs to be revised and updated. New information is more reliable. Quantities are now weighed at some transfer stations and rates of compaction at landfills have been found to be greater than estimate in the Plan. Substantially larger waste volumes and a significantly higher generation rate are occuring.	Updated, additional update in progress and included in a later unapproved appendix submittal
Include a summary of data on surrounding County waste types and volumes. Current waste import activities increasing pressure for import of other County's waste, addition and planning a solid waste system which can accomodate it.	Updated
Population information and projections need to be updated.	Updated

PROPOSED CHANGE	CURRENT STATUS
The economic feasibility of the Plan needs to be reviewed and revised.	Not analyzed. Economic feasibility stated in Revision to be left to private sector.
Assess the effect of lower inflation of lower energy demands on proposed waste-to-energy plants.	Status provided but economic feasibility not analyzed
Review of recycling goals considering low commodity prices for recovered materials;	Not Completed
Review the effect of regulatory changes which affect the cost of landfill operations and land suitable new landfill area; new information on the cost effectiveness of landfills within the County; and potential methods of improving the cost effectiveness of current landfills.	Not Completed
Implementation Schedule - Update to indicate the revised status and schedule of the four potential waste-to-energy projects; and possible future facilities proposed in revising the disposal and resource recovery sections of the Plan.	Status provided but implementation schedule not provided
Plan Administration and Funding Sources - Revise the Plan to reflect the operator fee, first established in the 1985-1986 budget year, as a funding source for the Plan Revision and Plan maintenance activities.	Operator fee is mentioned briefly but not described as required by Plan Report. No ordinance or financial information is provided.
Disposal - review and consider the need for, and inclusion in the Plan of possible new Solid Waste facilities or landfill expansion areas. Consider capacity needs to accomodate the proposed new importation of San Francisco waste and possible interim importation of waste from Contra Costa County while facilities are being sited in that County.	Recent Amendment text is included but no facility needs assessment or additional import possibilities are discussed.

PROPOSED CHANGE	CURRENT STATUS
Resource Recovery - Revise to reflect the current status of the four waste-to-energy Plants proposed in the current Plan and projected to be constructed and operating by now. Review the impediments to these projects and discuss methods for renewed efforts and revised schedules for implementation.	History provided and project status updated, but no revised schedule provided or discussion of impediments to implementation efforts. No new efforts proposed.
Review the combined materials recovery and recycling goals of the present Plan. These call for 67% by the early 1980's and 92% by the 1990's. Consider whether these are realistic numbers given the current recycling rate of below 10 percent.	Old goals removed, but no new goals provided
Reset the level and timing of recycling percentage goals to consider the current economic feasibility of recycling and the progress and feasibility of Waste to energy projects now in the Plan.	No new goals provided. Deferred to separate recycling study.

B. BOARD REQUESTED ACTIONS

PROPOSED CHANGE	CURRENT STATUS
Plan **Administration** - Reflect the responsibility of the Solid Waste Management Authority administering the use of the mitigation fee for the import of San Francisco waste and developing a fee use Implementation Plan.	This role and the administrative structure is not fully described.
Disposal/ Processing of Wastes	
Update disposal site and transfer station waste volumes and waste type information.	Existing facilities information updated.
Reflect changes in disposal facility and transfer station ownership, name and operators.	Existing facilities information updated.

PROPOSED CHANGE	CURRENT STATUS
Revise descriptions of facilities to reflect improvements in facilities, stations, and changes in operation.	Existing facilities information updated.
Update remaining site life information of all existing facilities, county, city and private. Review and revise the future disposal site information. Include proposals for future disposal sites and landfill expansions and county actions since the existing Plan.	Table and Map Updated. However, no proposed facilities, including the Oakland Transfer Station or Berkeley Compost Facility, are included.
Consider means to implement the 50 year capacity siting program, included in the Plan through Amendment #2, for the continued acceptance of San Francisco waste at Altamont Landfill, and identify potential new landfill capacity siting areas for this proposal.	Not completed. Deferred to a separate siting study to be contracted out as part of the continued Revision effort.
Review alternatives for future facilities stated in the existing Plan and revise or remove as necessary. Define recommended alternatives for future sites in each wasteshed/planning area.	Minor discussion. List and discussion of existing facilities is updated.
Include discussion of any resource recovery options to be used in place of, or in conjunction with existing or potential sites to extend their anticipated lives.	New recycling feasibility is largely deferred to a later separate recycling study. Cost effectiveness is listed as only an "ongoing evaluation process"
Disposal site needs for septage and greasetrap wastes should be considered.	Not in Revision. List of sites accepting included in later unapproved Appendix, No needs analysis is completed
Possible inert waste sites to recycle or dispose of demolition wastes should be considered as a means of decreasing the cost of disposing of these materials and preserving disposal capacity necessary for municipal wastes.	No discussion provided

PROPOSED CHANGE	CURRENT STATUS
Resource Recovery Delete or designate as inactive those waste-to-energy proposals which are not being pursued or are no longer deemed economically feasible. Describe new waste-to-energy projects which are being seriously investigated, including but not limited to, the potential for a regional waste-to-energy facility at the Altamont Landfill.	History provided, but no new feasibility analysis or decisionmaking on which projects are still bona fide. Currently status given. No information on implementation timing or proposed potential for providing actual disposal capacity
Enforcement Program Show measures necessary to bring the facility currently on the Open Dump Inventory into compliance with the State Minimum Standards.	No mention of non-complying facilities
Delineate the County and City of Berkeley Local Enforcement Agency Programs which are not currently included in the Plan.	Reference is made to City of Berkeley's role, but Enforcement Program for the City of Berkeley is not included
Economic Feasibility Show the economic feasibility of the preferred Plan programs.	The submittal states that the cost/benefits of private operations and public agencies are determined by the entitities affected on a project by project basis. This is not in compliance with the Planning Guidelines
Implementation Schedule Show the approximate dates for the implementation of the Plan programs, including dates for the establishment, expansion and closure of solid waste facilities.	Implementation schedule shows only ongoing programs and continued Plan Revision efforts

III. CONCLUSIONS

Based on the above review of the County's actions comparison of the Plan Revision's content to the content requirements set by the Board-approved Plan Report, staff has drawn the following conclusions.

Regarding the local Plan Revision process, the material submitted was not circulated to the Cities for approval as a final Plan Revision. As such, there are no City approval resolutions as required by the Planning Guidelines. Neither was it approved by the County Board of Supervisors.

Regarding the content of this Plan Revision, it does not appear to fulfill either the requirements of the Planning Guidelines or of the Board-accepted March, 1986, Plan Review Report.

The proposed Plan Revision includes existing facilities only. It does not address the need for additional or expanded transfer and disposal facilities or the implementation of proposed waste-to-energy facilities. While significant changes have been made in updating current facilities data, the future of these facilities and potential new facilities has not been addressed as required by the Plan Report.

The following additional deficiencies were also noted:

* Regarding future disposal sites, there is a requirement in the Amendment for post 1988 import of waste that the County site and maintain 50 years siting capacity for Alameda County citizens. Efforts to begin this siting are deferred to a separate study.

* Solutions to disposal issues such diversion of inert waste from municipal landfill capacity are not addressed even though their is a current local application for the further expansion of the Vasco Road Landfill for this purpose.

* Disposal site needs for septage and greasetrap waste have not been discussed.

* The County has several proposed waste-to-energy projects. The current CoSWMP has promised much in this area. Several projects in the County received Board grants for project studies. While history of these projects is discussed by the County in the Plan Revision, their current economic feasibility and potential to provide a disposal alternative for the County is not analyzed.

* The Plan Revision provides data updates on waste generation, collection and disposal facilities but does not attempt analysis and prescribe proposed programs based on this updated information.

* Enforcement Program measures to address non-facilities in the County are not addressed. The one City enforcement program within the County is not included in the Plan.

* The Economic Feasibility of the Plan Revision and proposed waste-to-energy facilities remaining from the previous plan are not addressed. Administration of the current and contracted future waste import mitigation funds is also not described.

* Recycling goals are not reassessed nor is the feasibility of additional recycling. This is deferred to a later,

separate study.

* Correspondingly, the Implementation Schedule of the Plan Revision is indefinite in the programs shown. It portrays the status and remaining capacity of current facilities, but not projects and program schedules.

    1. No new programs are shown.

    2. Those current programs already required by the Altamont Landfill Plan Amendment for the continued import of San Francisco waste after March, 1988, are also not shown.

    3. A schedule for further Plan Revision efforts by the contractor and the County, extending into November, 1987, is also included in the County submittal.

In Summary, the Plan Revision appears to be in a data collection stage - analysis and policy and program decisions based upon this data have not yet been accomplished. The Plan Revision represents an almanac of solid waste information and a solid waste program history summary.

The remainder of the Plan Revision, beyond the facilities element, is, by the County's own admission, incomplete. While most of the topics required in a Plan Revision are mentioned, discussion of these topics is incomplete and inadequate both in breadth and depth to meet the requirements of the Board-accepted Plan Review Report. The Plan Revision process has not been utilized as a program audit or system-wide planning analysis as the basis for future policy and program implementation.

BOARD OPTIONS:

1. Approve the Plan Revision

    This would be appropriate if the County had complied with Board content requirements for the Plan Revision and followed the process required for local approval of a Plan Revision which is defined by the California Administrative Code.

2. Partially Approve the Plan Revision with Additional Time Provided for Further Necessary Revision

    This would be appropriate if the County has complied with most of Board's content requirements for Plan Revision as stated in the accepted Plan Review Report and all of the process requirements of the Planning Guidelines. Additional time could be provided for the modifications necessary if the County had not met all requirements for preparing the Plan Revision.

To grant additional time, the Board would need to find that the County had made a "good faith" effort in satisfying the Board's Plan Revision content requirements. During this additional time, the CoSWMP would not be considered delinquent.

3. Partially Approve the Plan Revision with No Provision of Additional Time for Completion and Direct the County to Further Revise its Plan

This would be appropriate if the Board found the part of the Plan submitted to be adequate but found that a "good faith" effort had not been made to complete a thorough Plan Revision. This option would be appropriate as one means to give the County direction on what was missing to make the Plan Revision complete. It would do so without recognizing the efforts to date as adequate to comply with the Plan Revision requirements or allowed revision timeframe of 270 days. During additional Revision efforts, the Plan would be considered "delinquent".

4. Take No Action and Continue the Item for Later Decision

This would serve no useful purpose unless the Board needed more information from staff or the County for decisionmaking. It would also indicate that the Board was intending to act on the item, either at a time certain or when the necessary missing information for decisionmaking was provided.

Section 17153 of Title 14, California Administrative Code, which requires the Board to consider a Plan Revision within 90 days of submittal by the County. This Plan Revision was submitted on December 19, 1986. The 90 day limit would expire on March 19, 1987. Previous continuance of the item has been at the request of the County so the Board has not single handedly violated this limit. The Board may desire to seek the advice of counsel regarding any implications of further continuance prior to selecting this item.

5. Deny the Plan Revision

This option would be appropriate if the Board determined that the County did not comply with the Planning Guidelines and the Board-accepted Plan Report criteria and has not provided the substantive content necessary to meet the spirit of these criteria and the intent of the Plan Revision.

Under Section 17154, Title 14, California Administrative Code, denial of the Plan requires the County to resubmit the Plan Revision within 120 days with the required modifications. This section allows that the Board may provide additional time to complete these modifications if there is determined to be good cause.

During both the 120 day resubmission time and any additional time granted the Plan should be considered "delinquent" unless the Board finds that a "good faith" effort was made in the initial Plan Revision to comply with the Board's requirements and the Planning Guidelines.

STAFF RECOMMENDATION:

Staff recommends Option #5, and that the Board adopt Resolution #87-9 which denies the Alameda County Plan Revision, declares the County Plan delinquent, and directs the County to submit a Plan Revision workplan for remedying this delinquency while revising its County Solid Waste Management Plan in the areas identified in the Plan Review Report.

ATTACHMENTS:

1. Letter of Submittal from William Fraley, Secretary, Alameda County Solid Waste Management Authority, dated December 15, 1986.

2. CWMB letter indicating approval of Plan Report and requesting work program, dated April 29, 1986.

3. Letter from Alameda County submitting formal timetable for Plan Revision, dated May 20, 1986.

4. Letter from CWMB stating work plan does not meet 270 day requirement and informing County that they are scheduled to present case for time extension dated June 17, 1986.

5. Staff letter to County informing of Board denial of time extension, and unacceptable work plan and requesting Plan Revision work schedule, within 15 days, which meets the 270 day timeframe allowed by regulation. Sent Certified Mail, dated July 24, 1986.

6. Alameda County reply to CWMB staff, stating inability to change revision timeframe to comply with 270 days, <u>due to consultant contract</u>, dated August 5, 1986.

7. Letter from William Fraley, accepting position on Planning Process Committee, dated August 5, 1986.

8. Letter from CWMB to County restating need to comply with 270 day Revision requirement and submit appropriate time schedule, dated September 12, 1986

9. Resolution 86-99, of the Alameda County Solid Waste Management Authority, dated December 16, 1986.

10. Resolution 87-9, Denying the Alameda County Plan Revision and Directing County to Revise the CoSWMP.

11. Alameda County Solid Waste Management Plan Revision, as approved by the Alameda Solid Waste Management Authority on December 18, 1986 (sent under separate cover).

ATTACHMENT 1

ALAMEDA COUNTY SOLID WASTE MANAGEMENT AUTHORITY
399 Elmhurst Street, Hayward, California 94544 (415) 881-6401

December 17, 1986

DEC 19 1986

George T. Eowan
Chief Executive Officer
California Waste Management Board
1020 Ninth Street, Suite 300
Sacramento, CA 95814

Dear George:

At the December 17, 1986 meeting, the Alameda County Solid Waste Management Authority, adopted Resolution No. 99, the Alameda County Solid Waste Management Plan Revisions to Chapter 4. This plan addresses only changes in the facilities portion of the plan; the policies portion remains as adopted.

In response to State law, Alameda County has adopted a series of solid waste management plans. The first, a policy plan, was adopted by the County Board of Supervisors in 1976. A short-term facilities plan was adopted by the County Solid Waste Management Authority in 1977, and a medium- and long-term facilities plan in 1978. A revised facilities plan was adopted by the Authority in 1981.

The Alameda County Solid Waste Management Authority, through its Plan Review Committee and consultant, is currently preparing a plan amendment begun in May, 1986, scheduled to be completed in early 1987. The review process by Authority and cities will follow. This is beyond the time period presently included in state law which allows 270 days for completion after state action on the County Plan Report. For Alameda County this action took place on March 21, 1986.

The Authority and staff have undertaken the present facilities plan revision to meet the 270-day State time frame. The more detailed comprehensive plan amendment is being undertaken concurrently as shown in the timetable in this present facilities plan. The comprehensive plan amendment will be referred to member agencies for approval in accord with state law.

This present facilities plan and environmental documentation were referred to each concerned agency for review and two public hearings were held by the Alameda County Solid Waste Management Authority on November 19, 1986 and December 17, 1986.

A summary of the comments to the plan and staff response is included with the plan. The summary indicates which changes have been made in the adopted revised plan.

If you have any questions or comments regarding this plan, please call me.

Very truly yours,

William H. Fraley
Secretary

WHF/BC/jpb
Encl.

1027S

CALIFORNIA WASTE MANAGEMENT BOARD
1020 NINTH STREET, SUITE 300
SACRAMENTO, CA 95814

APR 29 1986

Mr. William Fraley
Alameda County Solid Waste Management Authority
399 Elmhurst Street
Hayward, CA 94544

Subject: Acceptance of the Alameda County Solid Waste Management Plan (CoSWMP) Review Report

Dear Mr. Fraley:

Enclosed is California Waste Management Board Resolution #86-14, accepting the subject Plan Review Report. The Resolution also prescribes those areas of the Alameda CoSWMP, which the Board believes should be revised in order to bring the Plan into full compliance with State Policy and the Planning Guidelines.

According to California Administrative Code Section 17152, Plan Revisions are due to the Board 270 days after Board acceptance of the Plan Review Report. Therefore, this Plan Revision must be submitted no later than December 18, 1986. As indicated in Resolution #86-14 (attached) the Board also requests an updated timetable from the County for development of the Revision in 30 days.

I would like to take this opportunity to commend the County for its conscientious efforts towards assuring the County Plan continues to be a viable and useful planning tool.

If we can be of any assistance during the development of the Plan Revision, you may call me at (916) 322-3330 or Eric Maher of our Local Planning Division at (916) 322-2674.

Sincerely,

Original signed by:
George T. Eowan

George T. Eowan
Chief Executive Officer

Enclosure

mgz

ATTACHMENT 3

ALAMEDA COUNTY SOLID WASTE MANAGEMENT AUTHORITY
399 Elmhurst Street, Hayward, California 94544
(415) 881-6401

May 20, 1986

George T. Eowan
Chief Executive Officer
California Waste Management Board
1020 Ninth Street, Suite 300
Sacramento, CA 95814

Dear George:

Attached for your Board is a copy of the schedule to review the Alameda County Solid Waste Management Plan prepared by Black & Veatch, Engineers-Architects, Walnut Creek, CA.

This is submitted pursuant to your Board Resolution 86-14 which requires a timetable for our program.

This timetable was included also in the copy of the Agreement between Alameda County and Black & Veatch which was forwarded to your office previously.

I direct your attention to the period within which this review is to be accomplished. You will note that it extends beyond the period established in Section 17152 of the California Administrative Code. This is necessary considering the extent of the review and analysis that the Authority feels is necessary in order to develop a plan that will serve our needs for the future. We are directing particular attention to reducing the generation of waste, reduction of waste to landfill, protection of existing landfill sites in the County from encroachment by incompatible uses, the extent to which the County can deal effectively with hazardous waste, and contingency plans in the event the present and future systems for waste management are disrupted.

These issues are extremely complex in the diverse urban area of our County and need to have sufficient time to address and resolve these issues. We feel it more important to deal with these issues properly rather than do a superficial job to meet a statutory time limit.

I believe that our past actions demonstrate our continuing concern and attention to waste management issues in Alameda County. Our current plan is more than adequate to serve our immediate needs well beyond the period required to accomplish our review. Our program and financial commitment to accomplish our review in a timely manner is assured also. I trust that your Board will concur and recognize the time schedule established in our review program.

ATTACHMENT 4

STATE OF CALIFORNIA GEORGE DEUKMEJIAN, Governor

CALIFORNIA WASTE MANAGEMENT BOARD
1020 NINTH STREET, SUITE 300
SACRAMENTO, CA 95814

June 17, 1986

William H. Fraley, Secretary
Alameda County Solid Waste Management Authority
399 Elmhurst Street
Hayward, CA 94544

RE: Triennial Revision of the Alameda County Solid Waste Management Plan (CoSWMP)

Dear Bill:

I have received and reviewed your May 9 and May 20, 1986 letters. I am pleased at the prompt, diligent and professional response you and the Authority have made to the Board's approval of Alameda County's Plan Review Report. By immediately hiring a consultant and establishing a schedule and ambitious workplan, you have taken important steps toward producing a revised CoSWMP of quality and utility, which addresses the complex issues in solid waste planning, such as provision of capacity, land use compatibility, hazardous waste and contingency planning.

I am constrained, however, to reiterate that Title 14, California Administrative Code (CAC), Section 17152, clearly establishes a 270-day time frame for completing CoSWMP Revisions. No law or regulation provides for extensions of that time requirement. Technically, the schedule you are proposing will cause you to violate the regulation. The Board, in January 1985, directed the enforcement of the planning laws and regulations against Counties which were then seriously delinquent in complying with their solid waste planning requirements.

The Board's foremost concern surrounding solid waste management planning is to encourage and support counties in producing both timely and effective CoSWMPs. For this reason, the Board has put your request for an extension of the regulatory time frame on its Agenda for the July 10-11 1986 Board Meeting.

Thank you for keeping me apprised of your efforts. Please do not hesitate to consult with the Board's Planning Staff as you see fit during the revision process.

Sincerely,

George T. Bowan
Chief Executive Officer

Please advise me if it is necessary for a formal action on the part of your Board to extend the time period established in Section 17152.

I shall continue to keep you informed of the progress of our studies so that your review at the proper time will be facilitated.

We continue to appreciate your assistance in this regard. Please contact me if you have any questions.

Very truly yours,

William H. Fraley
Secretary

WHF/jpb
Att.
cc: Eric Maher

0781S

STATE OF CALIFORNIA

GEORGE DEUKMEJIAN, Governor

CALIFORNIA WASTE MANAGEMENT BOARD
1020 NINTH STREET, SUITE 300
SACRAMENTO, CA 95814

JUL 24 1986

CERTIFIED MAIL

William H. Fraley
Secretary
Alameda County Solid Waste Management Authority
399 Elmhurst Street
Hayward, CA 94544

Subject: Consideration of Plan Revision Work Plan and Time Extension Request

Dear Mr. Fraley:

On March 20, 1986 the California Waste Management Board took action on the Alameda County Plan Review Report, requiring the County to revise the Plan within 270 days. The County was also directed at that time to submit a work program for completion of the Plan. On May 9, 1986 you submitted this work program which indicated that more time than the 270 days would be needed to complete the Plan Revision.

At my suggestion you, appeared before the Board on July 11, 1986 to present the County's need for this additional time. The Board took action at that time to deny an extension of time for preparation of the Plan Revision. Therefore, I am obliged to request that you submit a revised time schedule which indicates a program for completion of the Plan Revision within the 270 days allowed by the California Administrative Code. We request that this revised time schedule be submitted within 15 days of receipt of this letter.

If you have any questions regarding this matter, please contact me at (916) 322-3330.

Sincerely,

Original signed by:
George T. Eowan

George T. Eowan
Chief Executive Officer

AUG - 7 1986

ALAMEDA COUNTY SOLID WASTE MANAGEMENT AUTHORITY
399 Elmhurst Street, Hayward, California 94544 (415) 881-6401

August 5, 1986

George T. Eowan
Chief Executive Officer
California Waste Management Board
1020 Ninth Street, Suite 300
Sacramento, CA 95814

Dear George:

This is in response to your request for a revised schedule to complete our County Plan Review by December 15, 1986.

It is my continuing desire to comply with the State requirements in all matters. I have explained previously our current program to you and your Board and I am confident that we each understand our respective concerns and objectives.

I am unable at this time to revise our present schedule since it is in our consultant contract and our program is moving ahead on schedule. The schedule is designed to provide the time necessary to accomplish the revisions we feel we need in our plan to guide waste management for the next few years while introducing major programs to accomplish effective recycling programs and reduction of waste to landfill, in addition to those revisions directed by your Board. To do any less would not meet our needs and thereby not meet the needs of the State in advancing waste management improvements at the local level.

I monitor the progress of our consultant to assure that our schedule is followed. Our work may progress more rapidly than our original estimates if the public hearings are not extended for some reason.

I believe there are some alternatives available to us provided by the State statutes if it appears in the near future that some adverse impacts may arise as a result of not having a plan revision completed within the prescribed time limits. I shall exercise those if the need arises.

I would like to concentrate my efforts at this time on an amendment to the Administrative Code that would permit your Board authority to grant extensions to the time limits prescribed. I believe this will produce more positive results than designing a schedule to amend a complex waste management plan for a large metropolitan area merely to meet a time period at the expense of a realistic plan.

Please be assured that we continue to offer our cooperation to meet your Board's concerns. I believe that our past record demonstrates our serious and effective attention to solid waste matters in Alameda County.

I trust you understand our position and this response serves your immediate needs.

Please contact me if it does not.

Very truly yours,

William H. Fraley
Planning Director

WHF/jpb
Encl.
0865S

cc: C. Shute

ATTACHMENT 7

ALAMEDA COUNTY SOLID WASTE MANAGEMENT AUTHORITY
399 Elmhurst Street, Hayward, California 94544 (415) 881-6401

August 5, 1986

Sherman E. Roodzant, Chairman
California Waste Management Board
1020 Ninth Street, Suite 300
Sacramento, CA 95814

Dear Sherman:

This is in response to your letter of July 28, 1986 concerning a Committee to review the Plan Process and regulations which govern the process.

I shall be pleased to participate on the Committee and contribute whatever I can of my experience and knowledge.

I would suggest that the Committee task be clearly defined with respect to objectives to be achieved, staff support available, and a specific time schedule to accomplish the objectives. This will assure that the effort to be expended is concentrated and produces the desired results within a useful period of time.

I would urge that the Committee be established as soon as possible so the maximum attention can be directed towards the work of the Committee immediately.

Please contact me as soon as you wish to get started.

Very truly yours,

William H. Fraley
Planning Director

WHF/jpb

cc: G. Eowan

0866S

ATTACHMENT 8 file

STATE OF CALIFORNIA
GEORGE DEUKMEJIAN, Governor

CALIFORNIA WASTE MANAGEMENT BOARD
1020 NINTH STREET, SUITE 300
SACRAMENTO, CA 95814

SEP 12 1986

Mr. William H. Fraley
Planning Director
Alameda County
399 Elmhurst Street
Hayward, CA 94544

Dear Mr. Fraley:

Thank you for your letter of August 5, 1986 addressing the issue of a revised time schedule for the Revision of the Alameda County Solid Waste Management Plan.

As was stated in our Board meeting on July 11, the regulatory period for Revision of Solid Waste Management Plans is 270 days as referenced in Section 17152 of the California Administrative Code. Any Plan Revision not submitted within that time period becomes delinquent. In addition, Section 17141 of the California Administrative Code requires that an appropriate time schedule for completion of Plan Revisions be submitted.

Thus far, we have not received a time schedule which is appropriate to the timely completion of the Alameda Plan Revision. Until such time that there is a change in the regulatory requirement for the Plan Revision period, the Board must require the Counties to abide by the 270 day limit.

I would like to add, that I appreciate your efforts in working with our Board to re-examine our Planning regulations. Your cooperation is greatly appreciated, if you have any questions, please feel free to contact me at (916) 322-3330.

Sincerely,

George T. Eowan
Chief Executive Officer

mgz

urgent

9/10

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ALAMEDA COUNTY SOLID WASTE MANAGEMENT AUTHORITY

RESOLUTION NO. 99

AT MEETING HELD DECEMBER 17, 1986

APPROVAL OF SOLID WASTE MANAGEMENT PLAN
Revisions to Chapter 4

MOVED BY PETER SNYDER
SECONDED BY LOUIS CORTEZ

WHEREAS the California Government Code, Section 66780, et seq., requires the adoption of countywide solid waste management plans in order to protect the environment and provide for safe, sanitary and economical disposal of solid waste; and

WHEREAS the Solid Waste Management Plan (Policies Plan) was adopted on May 18, 1976, and the Solid Waste Management Facilities Plan (Short Term) was adopted on March 16, 1977, the Medium and Long Term Solid Waste Facilities Plan was adopted on October 5, 1978, and the Solid Waste Management Plan was adopted on October 1, 1981 and amended from time to time; and

WHEREAS a Joint Exercise of Powers Agreement for Solid Waste Management was executed on September 2, 1976, amended March 23, 1977, and amended February 14, 1983, authorizing the creation of the Alameda County Solid Waste Management Authority with responsibility to prepare state mandated solid waste management plans for the county; and

WHEREAS said Authority prepared Draft Alameda County Solid Waste Management Plan Revision, October 30, 1986 and a Proposed Negative Declaration; and

WHEREAS this Authority held duly noticed public hearings to consider said documents on November 19, 1986 and December 17, 1986; and

WHEREAS all interested persons were provided the opportunity to be heard on November 19, 1986, and December 17, 1986; and

WHEREAS this Authority has prepared an Initial Study and propose Negative Declaration and has received and considered comments thereon and t Authority finds that the adoption of the Negative Declaration is in f compliance with the California Environmental Quality Act; NOW THEREFORE

BE IT RESOLVED that this Authority has considered and h approves and adopts said Negative Declaration for the subject plan rev and

BE IT FURTHER RESOLVED that this Authority, having considered the Negative Declaration and all the other information presented, does hereby approve the Alameda County Solid Waste Management Plan Revisions to Chapter 4, Alameda County Solid Waste Management Authority, December 17, 1986; and

BE IT FURTHER RESOLVED that copies of said plan and this Resolution be transmitted to the California Waste Management Board as specified under state law.

ADOPTED BY THE FOLLOWING VOTE:

AYES: Campbell (2), Lucas, Ganong, Snyder, Fertig, Morrison, Sweeney, Wieskamp, Cortez, Riles, (3) Foulkes, Mercer, Jardin, Westgard, Sanford (18)

NOES: None

ABSENT: Skinner, Duncan (2)

EXCUSED: Martin (1)

ABSTAINED: None

WILLIAM H. FRALEY - SECRETARY
ALAMEDA COUNTY SOLID WASTE MANAGEMENT AUTHORITY

1018S

Attachment 10

CALIFORNIA WASTE MANAGEMENT BOARD
RESOLUTION # 87-9
February 26-27, 1987

Resolution of Denial of the Alameda County Solid Waste Management Plan Revision

WHEREAS, the Board finds that it has approved the revised Alameda County Solid Waste Management Plan on February 2, 1982 as meeting the requirements of the Nejedly-Z'Berg-Dills Solid Waste Management and Resource Recovery Act of 1972; and

WHEREAS, the Board finds that the County of Alameda reviewed its County Solid Waste Management Plan and submitted a report to the Board pursuant to Government Code Section 66780.5(b); and

WHEREAS, the Board finds that the County of Alameda determined that to be consistent with State Policy, the County Solid Waste Management Plan was in need of revision; and

WHEREAS, the Board accepted the Plan Review Report on March 15, 1986, and required revision of the Alameda County Solid Waste Management Plan within 270 days; and

WHEREAS, the Board determined that revision to the Alameda County Solid Waste Management Plan was needed in the following areas:

1) Identification of Solid Wastes (CAC, Section 17131)
2) Storage and Collection of Solid Waste (CAC, Section 17132 and 17133)
3) Disposal/Processing of Wastes (CAC, Section 17134)
4) Resource Recovery (CAC, Section 17135)
5) Plan Administration (CAC, Section 17136)
6) Economic Feasibility (CAC, Section 17137 and Government Code 66780.1))
7) Enforcement Program (CAC, Section 17138 and Government Code 66780.5)
8) Implementation Schedule (CAC, Section 17139 and Government Code Section 66714.9)

WHEREAS, Alameda County did not make the substantive changes in these areas as required by the Plan Review Report, as modified and accepted by the Board, in order to comply with the Planning Guidelines and Procedures for Preparing, Revising and Amending County Solid Waste Management Plans; and

WHEREAS, Alameda County has not made a concerted effort at preparing a comprehensive Plan Revision to meet the Board's requirements or exhibit a consistent pattern of compliance with the Board's procedural and time requirements for Plan Revision, which might warrant partial approval of the Plan.

NOW, THEREFORE, BE IT RESOLVED, that the California Waste Management Board denies the Alameda County Solid Waste Management Plan Revision; and

BE IT FURTHER RESOLVED, that because Alameda County failed to revise the Alameda County Solid Waste Management Plan as necessary to bring it into full compliance with State Policy within the 270 days allowed by the California Administrative Code, the California Waste Management Board will seek remedial action in response to this Plan Revision delinquency as it sees fit based on the advice of legal counsel; and

BE IT FURTHER RESOLVED, that the California Waste Management Board requires Alameda County to submit, as a basis for remedial action, a timetable for expedited Plan Revision completion and compliance.

CERTIFICATION

The undersigned Chief Executive Officer of the California Waste Management Board does hereby certify that the foregoing is a full, true, and correct copy of a resolution duly and regularly adopted at a meeting of the California Waste Management Board held on March 26-27, 1987.

Dated:

George T. Eowan
Chief Executive Officer

CALIFORNIA WASTE MANAGEMENT BOARD
Agenda Item #4
March 26-27, 1987

Item:

Consideration of Approval of the Kern County Solid Waste Management Plan Amendment for the Stallion Springs Community Services District Transfer Station, Tehachapi.

Key Issues:

- Amendment is to bring facility into compliance with the CoSWMP
- All cities approved amendment by default
- Project complies with CEQA
- Amendment will enable LEA to complete processing of last identified unpermitted facility.

Discussion:

On November 17, 1983, the Board approved the revised Kern County Solid Waste Management Plan (CoSWMP). On July 27, 1984, the Board approved Amendment #1 to provide for the Delano City Landfill. Amendment #2 was approved by the Board on September 12, 1985, to include the Shell Oil Company Scrubber Waste Site near Taft. Over the past several years the LEA has been identifying existing, unpermitted sites. On July 10-11, 1986, the Board approved Plan Amendments #3, #4 and #5 which included in the Plan the previously unpermitted Bear Valley Springs Transfer Station, the Southland Composting Facility and the Pine Mountain Transfer Station respectively. These sites were subsequently permitted by the LEA.

Amendment #6, which identifies the last unpermitted site, would modify the Plan to include the Stallion Springs Community Services District Transfer Station, southwest of Tehachapi. The facility presently receives about 30 cubic yards of domestic wastes weekly from residents of the area. The transfer station is serviced by a private contractor with final disposal to the Tehachapi Landfill. Approval of Amendment #6 by the CWMB would enable the LEA to proceed with preparation of the Solid Waste Facilities Permit.

All of the incorporated cities in the County approved the Amendment by default, as none of the cities responded within the 90 day period prescribed in the Board's Planning Guidelines and Procedures for Preparing, Revising and Amending County Solid Waste Management Plans. The County Board of Supervisors, at a properly noticed public hearing held on October 14, 1986, approved Amendment #6.

California Environmental Quality Act (CEQA):

A Notice of Exemption was prepared for the facility pursuant to the CEQA Guidelines. The County has determined that the project is an existing facility and would not have a significant effect on the environment. Board staff finds the Notice of Exemption filed is appropriate for the project.

Noncomplying Solid Waste Facilities:

The Bakersfield Landfill, a closed Class II-2 landfill, is the only facility in the County currently on the Open Dump Inventory and the State List of Non-Complying Facilities. The facility has been placed on the list because of a landfill migration gas problem. A gas control/recovery system has been recently installed and is currently being monitored by staff of the Board's Enforcement Division.

Staff Analysis:

Staff has analyzed Amendment #6 to the Kern CoSWMP and has determined that the necessary steps to include the Stallion Springs Transfer Station in the CoSWMP as required by the Board's Planning Guidelines and Procedures for Preparing, Revising and Amending County Solid Waste Management Plans have been completed.

Options for Board Actions:

1. Take no action. No logical purpose would be served by delaying action on this item.

2. Reject the Plan Amendment. This would be appropriate if the Amendment did not substantially comply with the Board's Planning Guidelines and Procedures for Preparing, Revising and Amending County Solid Waste Management Plans.

3. Approve Amendment #6 to the Kern County Solid Waste Management Plan as submitted, as the amendment substantially complies with the Board's Guidelines and Procedures for Preparing, Revising and Amending County Solid Waste Management Plans.

Recommendation:

Staff recommends the Board select Option 3 and approve Kern County Plan Amendment #6 as submitted and adopt Resolution #87-11.

Attachments:

1. Letter of Transmittal, L. Dale Mills, Kern County Director of Public Works, dated January 23, 1987.

2. Amendment #6, Kern County Solid Waste Management Plan and Map of Disposal Sites.

3. Resolution #86-675, Kern County Board of Supervisors dated October 14, 1986 approving amendment #6 to CoSWMP and finding the project in conformance with the General Plan.

4. Population statement.

5. Notice of Exemption filed with Kern County Clerk.

6. California Waste Management Board Resolution #87-11 approving Kern CoSWMP Amendment #6.

Attachment #1

L. DALE MILLS
Director of Public Works
County Surveyor
County Road Commissioner

Department of
PUBLIC WORKS
Mailing Address:
1600 Norris Road
Bakersfield, California
93308

January 23, 1987

File: 10060.24/3.6

George T. Eowan
Chief Executive Officer
California Waste Management Board
Planning Section
1020 Ninth Street, Suite 300
Sacramento, CA 95814
Attn: Theresa McGarry

Dear Mr. Eowan:

Notice of Intent to Amend the Kern County
Solid Waste Management Plan - 1983 Revision

Enclosed is the information required pursuant to Section 17162 and 17163 of the California Administrative Code (CAC) for you Board's preliminary review and approval of Amendment #6 to the Kern County Solid Waste Management Plan - 1983 Revision (CoSWMP).

The Solid Waste Management Plan requires amending to bring into conformance with the Plan the Stallion Springs Community Service District Refuse Transfer Station, located in Section 36, T.12N., R.17W., SMB; off Stallion Springs Drive, southwest of Tehachapi.

Conditional Use Permit No. 9, Map 184 was issued by the Board of Zoning Adjustment for the subject facility on September 8, 1986. A Notice of Exemption was prepared for the subject facility as allowed under Section 15301(b), of the State CEQA Guidelines, as it was determined that the project was categorically exempt as an existing facility and could not have a significant effect on the environment.

Pursuant to Section 17159 of the CAC, proposed Amendment #6 was submitted to the Regional Planning Agency (Kern County Council of Governments) for review on May 27, 1986.

Pursuant to Section 17160 and 17163(b) of the CAC, Amendment #6 was submitted to all incorporated cities within Kern County on May 27, 1986. Approval of the amendment by the incorporated cities was unanimous as none of the cities responded within the 90 day response period prescribed in Section 17160, CAC. A population statement and tabulation in accordance with Section 17163(b) is attached.

On October 14, 1986, the Board of Supervisors held a properly noticed public hearing to consider the proposed amendment to the Plan. The Board passed a resolution to approve Amendment #6 on the same day. Copies of the Resolution to hold a Public Meeting, the Staff Reports to the County Board and the Resolution of Approval are attached. Also attached are 21 copies of the amendment, one for preliminary review and twenty for approval.

Should you have any questions or comments regarding CoSWMP Amendment #6, please call Alex Sebastian at this office.

Very truly yours,

Harry J. Evans FOR

L. Dale Mills
Director

LDM:AMS:jb
DAY4
Attachments
CC Kit Carter, District Manager, Stallion Springs Community Services District, Star Route 1, Box 2800-11, Tehachapi, CA 93561

KERN COUNTY SOLID WASTE MANAGEMENT PLAN - 1983 REVISION

AMENDMENT #6

The County of Kern shall hereby amend the County Solid Waste Management Plan-1983 Revision as follows:

Item 1: Page 7: the last paragraph is added to include the existing Stallion Springs Transfer Station and reads "There is a transfer station owned and operated by the Stallion Springs Community Services District . It presently receives non-hazardous and inert solid wastes at a rate of 30 cubic yards per week, and is located at 28500 Stallion Springs Drive, southwest of Tehachapi."

Item 2: Page 8; the map titled COUNTY DISPOSAL SITES, is amended to include the above mentioned facility.

Refer to the two attached pages for exact changes.

ENV3-LE

Private and Federal Sites

There are two Class III and four Class II disposal sites in Kern County which are not operated by the County. Two of these are on Edwards Air Force Base and the remaining four are private.

At present time Shell California Production Inc. is planning to expand the North Belridge Class II and Class III Solid Waste Facility from 1.2 acres to 31.7 acres to handle the combined waste.

Table E lists pertinent data regarding these sites and Map 2 shows their locations in the County.

The Class II-1 disposal sites in the County are discussed further elsewhere in the revision.

Other Public Sites

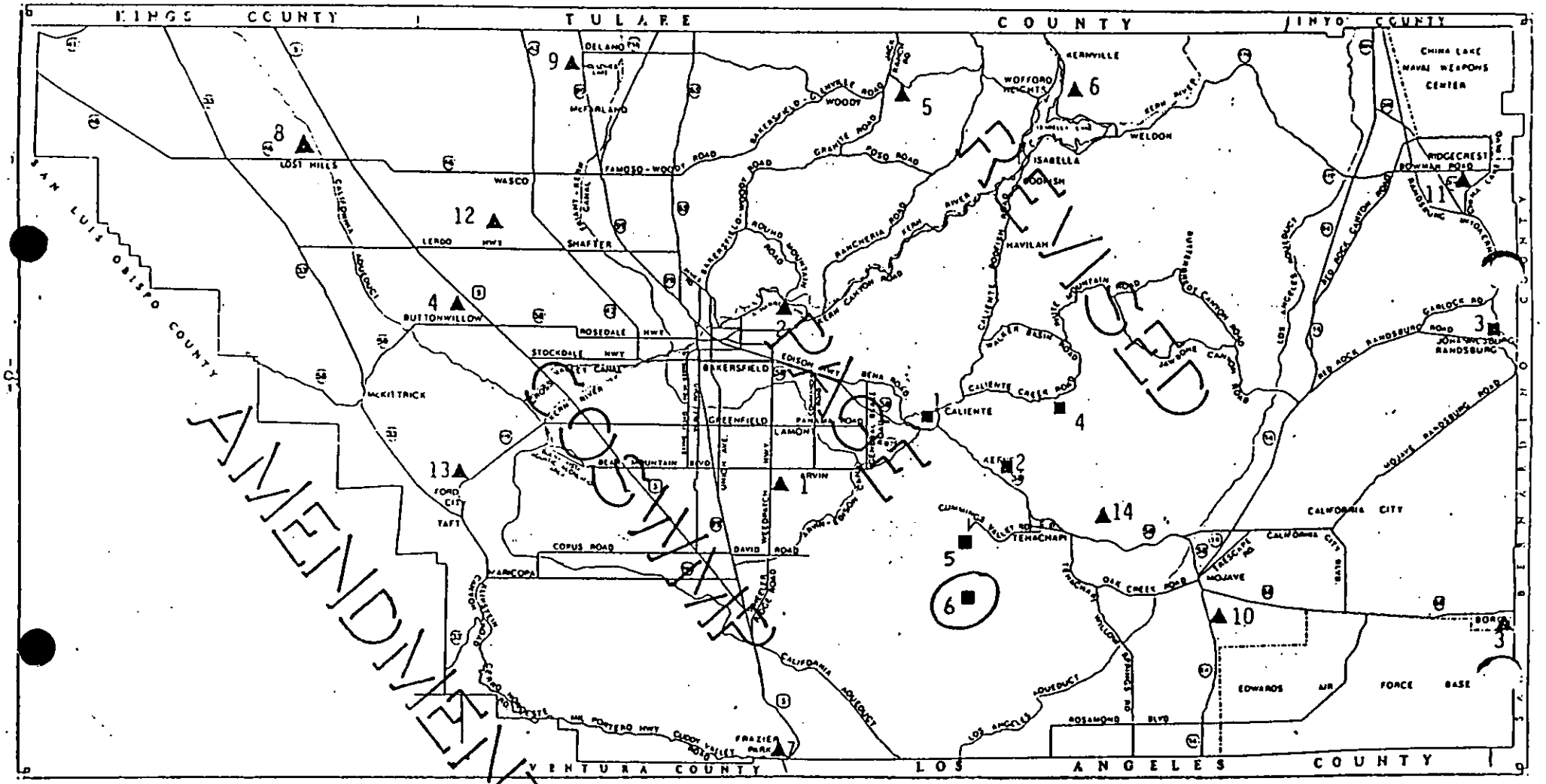
There is a transfer station owned and operated by the Bear Valley Springs Community Services District. It presently receives non-hazardous and inert solid wastes at a rate of 50 tons per day and is located at the northwest corner of Cumberland Road and Lower Valley Road west of Tehachapi.

There is a transfer station owned and operated by the Stallion Springs Community Services District. It presently receives non-hazardous and inert solid wastes at a rate of 30 cubic yards per week and is located at 28500 Stallion Springs Drive, southwest of Tehachapi.

REVISED PAGE COSWMP AMENDMENT

MAP 1

COUNTY DISPOSAL SITES



LEGEND

▲ Sanitary Landfills

1. Arvin
2. Bakersfield
3. Boron
4. Buttonwillow
5. Glennville
6. Kern Valley
7. Lebec
8. Lost Hills
9. McFarland-Delano
10. Mojave-Rosamond
11. Ridgecrest
12. Shafter-Wasco
13. Taft
14. Tehachapi

■ Transfer Stations

1. Caliente
2. Keene
3. Randsburg-Johannesburg
4. Loraine-Twin Oaks
5. Bear Valley Springs CSD
6. Stallion Spring CSD

Note: Transfer Station #5 is owned and operated by Bear Valley Springs Community Services Dist.
Transfer Station #6 is owned and operated by Stallion Springs Community Services Dist.

Attachment #3

Before the Board of Supervisors
County of Kern, State of California

In the matter of:
AMENDMENT NO. 6
TO THE SOLID WASTE MANAGEMENT
PLAN - 1983 REVISION

Resolution No. 86-675
Reference No. 868822

I, SHARON CLARK, Clerk of the Board of Supervisors of the County of Kern, State of California, do hereby certify that the following resolution, proposed by Supervisor Austin, seconded by Supervisor Shell, was duly passed and adopted by said Board of Supervisors at an official meeting hereof this 14th day of October, 1986, by the following vote, to wit:

AYES: Ashburn, Austin, Larwood, Shell
NOES: None
ABSENT: Harvey

BOARD OF SUPERVISORS KERN COUNTY, CAL.

SHARON CLARK
Clerk of the Board of Supervisors, County of Kern
State of California
Earlene Smith
Deputy Clerk

RESOLUTION

Section 1. WHEREAS

(a) The Solid Waste Management and Resource Recovery Act (Government Code Section 66701 et seq.) provides that each county is responsible for preparing, adopting, maintaining (including periodically updating and amending) and implementing a solid waste management plan for all waste disposal within its geographic boundaries; and

(b) The current (revised) version of the Kern County Solid Waste management Plan (adopted by this Board on September 12, 1983 and approved by the California Waste Management Board on November 17, 1983) does not mention the existence of the Stallion Springs C.S.D. Refuse Transfer Station and needs to be amended to reflect this facility; and

(c) The Public Works Department has undertaken an environmental review of this project and has concluded the preparation of Environmental Impact Reports are not required because the project is categorically exempt from the California Environmental Quality Act; and

(d) Pursuant to Government Code Section 66780.5 and California Administrative Code Section 17160, a majority of the cities within the County

69 86-675

which contain a majority of the population of the incorporated area of the County have approved the proposed amendments to the Kern County Solid Waste Management Plan; and

(e) Pursuant to Government Code Section 66780.1 and California Administrative Code Section 17159, the proposed amendment was submitted to the Kern County Council of Governments (the regional planning agency) on May 27, 1986; and

(f) On October 14, 1986, this Board held a properly noticed public hearing at which interested persons were invited to comment on the proposed amendment to the Solid Waste Management Plan.

Section 2. NOW, THEREFORE, BE IT RESOLVED that the Board of Supervisors of the County of Kern, State of California, hereby find, determine and declare as follows:

1. The above cited facts are true and this Board has jurisdiction to consider and make determinations in the matters herein mentioned.

2. The proposed amendment to the Kern County Solid Waste Management Plan involve placing in conformance with the plan the Stallion Springs C.S.D. Refuse Transfer Station, located in Section 36, T.12N., R.17W., SBM; off Stallion Springs Drive, southwest of Tehachapi.

3. The existing Stallion Springs C.S.D. Refuse Transfer Station was placed in conformance with the Kern County General Plan by the Board of Zoning Adjustment on September 8, 1986.

4. Conditional Use Permit No. 9, Map 184 was issued by the BZA for the subject facility on September 8, 1986.

5. A notice of exemption was prepared for the subject facility as allowed under Section 15301(b), of the State CEQA Guidelines, as it was determined that the project is categorically exempt as an existing facility and could not have a significant effect on the environment.

6. Amending the Kern County Solid Waste Management Plan to include the above referenced project, is approved.

7. The Director of the Public Works Department is authorized to submit applications, reports, or other documents to appropriate agencies and take all other actions necessary to accomplish the purpose of this resolution.

8. The Clerk of this Board shall forward copies of this Resolution to the Public Works Department, Planning and Development Services Department, Health Department and County Counsel.

POPULATION STATEMENT
PURSUANT TO SECTION 17163(b)
OF THE
CALIFORNIA ADMINISTRATIVE CODE (CAC)

The proposed Amendment #6 to the County Solid Waste Management Plan-1983 Revision was sent for approval to all eleven incorporated cities in Kern County on May 27, 1986. Not a single resolution expressing approval of the amendment was received from any of the incorporated cities. Section 17160, CAC, states that "if a city fails to act within 90 days, the city shall be deemed to have approved the amendment as submitted".

The cities approving the amendment (by default) have a total combined population of 178,740 residents. This represents 100% of the incorporated cities population, thereby satisfying the requirements of Section 17160 of the CAC, City Approval of the Amendments.

A tabulation of the May 1985, population estimate of the State Department of Finance, Population Research Unit is attached with the pertinent data highlighted in yellow.

NOTICE OF EXEMPTION

TO: [ ] Secretary for Resources
1416 Ninth Street, Room 1311
Sacramento, California 95814

[X] County Clerk
County of KERN

FROM: L. Dale Mills
Kern County Public Works
2601 "O" Street
Bakersfield, CA 93301

Project Title
Stallion Springs C.S.D. Refuse Transfer Station

Project Location-Specific
Section 36, T.12N. R. 17W., SBM; off Stallion Springs Drive, Southwest of Tehachapi

Project Location-City
Tehachapi

Project Location-County
KERN

Description of Nature, Purpose, and Beneficiaries of Project
This project consists of a low volume trasfer station, consisting of one 30 cu. yd. roll off container for the purpose of collecting, storing and transfering community generated solid waste refuse to the Tehachapi Landfill. The project has been in existence for 7 years.

Name of Public Agency Approving Project
Kern County Board of Supervisors

Name of Person Or Agency Carrying Out Project
Kern County Public Works Department

Exempt Status: (Check One)

- ____ Ministerial (Sec. 15268)
- ____ Declared Emergency (Sec. 15269(a))
- ____ Emergency Project (Sec. 15269 (b) and (c))
- X Categorical Exemption. State type and section number: Class 1 Section 15301 (b

Reasons why project is exempt:
This project is exempt as it consists of operation of an existing facility involving no expansion of use beyond that previously existing and as such will not have a significant impact on the environment.

Contact Person	Area Code	Telephone	Extension
Alex Sebastian	805	861-2481	252

If filed by applicant:
1. Attach certified document of exemption finding.
2. Has a notice of exemption been filed by the public agency approving the project? Yes X No ____

Date Received for Filing

Signature

9/17/86
Date

Director, Public Works Department

Attachment #6

CALIFORNIA WASTE MANAGEMENT BOARD
Resolution # 87-11

Resolution of Approval, Kern County Solid Waste Management Plan Amendment #6.

WHEREAS, the Nejedly-Z'Berg-Dills Solid Waste Management and Resource Recovery Act of 1972 (hereafter referred to as the Act), requires each County, in cooperation with affected local jurisdictions, to prepare a comprehensive, coordinated Solid Waste Management Plan consistent with State Policy and Planning Guidelines; and

WHEREAS, said Act also requires such Plan Amendments shall be consistent with State Policy; and

WHEREAS, the County of Kern has prepared a plan for solid waste management in conformance with the Act, and in October, 1983, the first Plan Revision was approved by the California Waste Management Board; and

WHEREAS, the County of Kern has prepared this Amendment to include the Stallion Springs Community Services District Transfer Station; and

WHEREAS, a Notice of Exemption on the project has been prepared in compliance with the provisions of the California Environmental Quality Act for this Amendment; and

WHEREAS, the majority of the cities with the majority of the population have approved this Amendment; and

WHEREAS, the County Board of Supervisors has adopted the Amendment to the Plan as submitted; and

WHEREAS, the California Waste Management Board has reviewed said Amendment and found it to be consistent with State Policy and the Board's Planning Guidelines and Procedures for Preparing, Revising and Amending County Solid Waste Management Plans.

NOW, THEREFORE, BE IT RESOLVED that the California Waste Management Board hereby approves the submitted Amendment to the Kern County Solid Waste Management Plan.

CERTIFICATION

The undersigned Chief Executive Officer of the California Waste Management Board does hereby certify that the foregoing is a full, true and correct copy of a Resolution duly and regularly adopted at a meeting of the California Waste Management Board held on March 26-27, 1987.

Dated:

George T. Eowan
Chief Executive Officer

CALIFORNIA WASTE MANAGEMENT BOARD
Agenda Item #5
March 26-27, 1987

Item:

Consideration of Acceptance of the Modoc County Solid Waste Management Plan Review Report.

Key Issues:

- o Data base and disposal capacity adequate
- o County sees no need to revise the Plan
- o Board staff feels Enforcement Plan Section needs revision

Background:

The Modoc County Solid Waste Management Plan (CoSWMP) was originally approved by the California Waste Management Board on May 28, 1976. On February 10, 1984, the State Board approved the first revision to the CoSWMP. On February 3, 1987, the County submitted a Plan Review Report and concluded that a revision of the Plan was not necessary at this time.

Staff Analysis:

The attached Staff Review and Comment (Attachment #1) analyzes the adequacy of the Modoc County Plan Review Report and provides the Board with an objective description of the current solid waste management program in Modoc County. Staff's analysis entails review of the Plan and Plan Review Report, meeting with County officials and visiting solid waste facilities in the County.

Staff believes the following Plan components except for the Enforcement Program Plan remain substantially unchanged since the last revision. However, Board staff feels the Enforcement Program Plan does not reflect current enforcement efforts in the County, and should be revised. The following represent Plan features and Board staff's evaluation of this current validity.

1. Data Base - Remains current.
2. Consistency with State Policy - Plan is consistent.
3. Economic Changes - Plan remains relatively unchanged.
4. Implementation Schedule - Has essentially been met.
5. Administrative Responsibilities - Remains unchanged.
6. Changes in Funding - Have remained constant to date.

7. Future Facilities - Present disposal facilities adequate through the long term planning period.
8. Elements of Plan not Implemented - All significantly planned actions have been implemented.
9. Enforcement Program Plan - Reviews of LEA practices and records indicate that existing enforcement practices do not meet the provisions of the present Enforcement Program Plan. Therefore, the Enforcement Program Plan should be revised to reflect an adequate program as described in Attachment #1, Section 1C.

Options for Board Action:

1. Do not accept the Plan Review Report

   This would be appropriate if the County had not complied with State Board requirements for the preparation of the Plan Review Report.

2. Take No Action

   This would be appropriate if there is new information available during the Board meeting which requires further analysis by either County or Board staff prior to Board action. Staff believes the current analysis is complete based on the available information.

3. Accept the Plan Review Report and Direct the County to Revise its CoSWMP

   This option would be appropriate if the County has complied with the Board's requirements for preparation of a Plan Review Report and the Board concurs with Staff's Recommendations for Plan Revision. The County has met all requirements for preparation of a Plan Review Report.

Staff Recommendation:

Staff recommends the Board adopt Resolution #87-12 accepting the Modoc County Plan Review Report and require the County to revise the County Solid Waste Management Plan, in the area identified, the Enforcement Program Plan (GC 66780.5).

Attachments:

1. Staff Review and Comment
2. Modoc County Solid Waste Management Plan Review Report
3. Map of County Waste Facilities
4. CWMB Resolution #87-12

Attachment #1

Staff Review and Comment
Modoc County Solid Waste Management Plan
Review Report

I. County Solid Waste Management System

A. Current System

1. Background

Modoc County is located in the northeast corner of the state about 300 miles northeast of Sacramento and contains a population of approximately 9,500. About one third of the residents live in Alturas, the only incorporated city which and also serves as the County seat.

Cattle ranching, timber and tourism comprise the major portion of the economy of the County. Over 65% of the County area is under Federal ownership and under the administrative responsibility of either the United States Forest Service or the Bureau of Land Management.

2. Administrative Responsibilities

The Modoc County Board of Supervisors is ultimately responsible for solid waste planning and policy in the County. To facilitate operations of the system, the Board has named the County Public Works Department to maintain the CoSWMP and to administer the collection and disposal system for the County.

The Modoc County Health Department is the local agency designated to enforce the State Minimum Standards for Handling and Disposal of Solid Wastes. Both the City of Alturas and the County have enacted solid waste ordinances.

3. System Financing

Planning, administration and disposal costs for solid waste management are derived from the County General Fund. In Fiscal Year 1986-1987, the County Solid Waste Budget was $165,000. Costs of enforcement are borne by the state under a direct contract for services.

4. Waste Generation

Approximately, 6,800 tons of residential and commercial wastes are generated annually in Modoc County, as calculated on a 7 day per week basis.

Wood wastes generated at the Alturas Mill are utilized as boiler fuel. An undetermined amount of agricultural wastes are generated in the County; however, these wastes are generally returned to the soil and do not enter the conventional waste stream.

5. Storage and Collection

Currently one franchise collector operates within the Alturas city limits while two unfranchised collectors provide service within the unincorporated areas of the County. Six dollars per month for two can weekly service represents a typical rate for collection within the County.

6. Transfer

Modoc County currently owns and operates seven transfer stations to serve the needs of County residents. Only the Newell site is attended. The station location and cubic yards of wastes handled annually are as follows:

STATION	CUBIC YARDS PER YEAR
Adin	3288
Canby	2836
Davis Creek	760
Likeley	1224
Lookout	2548
Newell	4696
Willow Ranch	1348

7. Disposal

Currently, Modoc County owns and operates five landfills. Locations and pertinent information on these sites are as listed:

Landfills	Tons per year	Expected Closure
Alturas	5800	2055
Cedarville	475	2026
Eagleville	145	2003
Fort Bidwell	2200	2005
Lake City	145	1999

8. Litter Management

Responsibility for litter management in the County is vested with several agencies. The County Department of Public Works through the use of prison trustees performs litter clean-up along County rights of way. The City of Alturas provides litter control within their boundaries while Caltrans provides litter control along state highways.

9. Resource Recovery

A small scattered population coupled with long distances to markets for recyclables have limited the opportunities for resource recovery in the County. A beverage distributor in Alturas presently provides a market for aluminum cans.

B. Enforcement Program

The Modoc County Health Department is the local agency to enforce the State Minimum Standards and local solid waste ordinances. In 1981, the Health Department submitted a Solid Waste Enforcement Program Plan to the Board, which was incorporated into the CoSWMP at the February, 1984, Plan Revision. This document indicates a review of all Solid Waste Facility Permits will be made annually, all disposal facilities will be inspected at least quarterly, and results of these inspections forwarded to the CWMB.

A visit to the County by Board Enforcement staff in December, 1986, indicated little evidence of permit review or inspections of solid waste facilities, and the facilities visited showed numerous violations. Virtually, no SWIS inspection forms have been filed with the Board as required by CWMB policies over the past six years.

Currently, all environmental services and duties including LEA functions are performed by a single State Public Health Sanitarian provided by the State Department of Health Services under yearly contract with the County of Modoc.

C. Current Issues

The County is currently developing a public program for the handling and disposal of pesticide containers.

D. System Improvements

Since the approval of the last Modoc County Solid Waste Management Plan Revision in March, 1984, the following steps have been taken to improve the County's solid waste system:

1) The Cedarville Landfill has been closed due to hydrologic problems and a new site opened approximately one mile away.

2) The Lookout Landfill has been closed and a transfer station erected on the site.

II. Report Summary

The Modoc County Plan Review Report has been submitted to the CWMB in compliance with Government Code Section 66780.5(b) and Title 14, CAC, Section 17141. In the Report, the County has stated that the Plan currently reflects the solid waste program in Modoc County and the County does not wish to revise the Plan at this time.

III. Staff Analysis

Staff has reviewed the Report submitted by Modoc County, which substantially reflects the solid waste management program in Modoc County. Staff, however, believes that revision of one element of the Plan is necessary. Changes needed in this element are as follows:

Enforcement Program Plan

This section, as drafted by the County Health Department in 1981, should be revised to reflect an adequate and realistic program of inspections, reinspections and other follow up efforts needed to ensure satisfactory enforcement of the State Minimum Standards.

Attachment #2

MODOC COUNTY
Department of Public Works
202 WEST 4TH STREET
ALTURAS, CALIFORNIA 96101
Phone: 916-233-3939 ext. 403 or 404

ROBERT J. WICKENDEN
DIRECTOR

February 2, 1987

State of California
California Waste Management Board
Waste Management Division
1020 9th Street, Suite 300
Sacramento, CA 95814

RECEIVED
FEB - 2 1987

ATTN: Cy Armstrong
Associate Planner

RE.: Modoc County Solid Waste Management Plan
Review Report

Dear Mr. Armstrong:

In response to your letter dated December 31, 1986, the Modoc County Department of Public Works has reviewed the County Solid Waste Management Plan as required by Government Code Section 66780.5(b).

The Department informed the City of Alturas that the review was underway, and invited their comments. No comments were received. Also informed were the Modoc County Planning Department and the Modoc County Health Department (Local Enforcement Agency). Both of these agencies indicated that they would have no comment regarding the review.

Enclosed is the Plan Review Report in accordance with Section 17141(b) of Title 14 of the California Administrative Code. As indicated in the report, the County completed a Plan Revision three years ago, and has determined that no significant changes have occurred since that time requiring further revisions or amendments.

Thankyou for your assistance and cooperation in this matter. If there are any questions or comments, please contact me at your convenience.

Sincerely,

ROBERT J. WICKENDEN, DIRECTOR

Stanley Townsend
Deputy County Surveyor

Attachment #2

MODOC COUNTY
Department of Public Works
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ROBERT J. WICKENDEN
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February 2, 1987

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Sincerely,

ROBERT J. WICKENDEN, DIRECTOR

Stanley Townsend
Deputy County Surveyor

Modoc County Department of Public Works
Solid Waste Management Plan Review Report
February 1987

INTRODUCTION

The Modoc County Solid Waste Management Plan (CoSWMP) was prepared for the county by Emcon Associates in 1975. The plan was reviewed in 1983 and revised at that time to bring the plan into compliance with state policy and planning guidelines. The revised plan was approved by the California Waste Management Board on February 10, 1984. As required by Government Code Section 66780.5(b), the plan has again been reviewed. The Modoc County Department of Public Works notified the City of Alturas (the only incorporated area in the county) that the review was in progress, and solicited their comments regarding the adequacy of the current plan. The Environmental Health Division of the Modoc County Health Department (Local Enforcement Agency) was also informed of the review process, as was the Modoc County Planning Department. No comments were received from any of these agencies during the review process. This document constitutes a report of the results of the review of the County Solid Waste Management Plan.

ADEQUACY OF THE DATA BASE

Based on figures provided by the California Department of Finance, the estimated population of Modoc County as of January 1986 was 9,518. This conforms quite well with the predicted population (9,160) from the projections included in the original and revised CoSWMP. The projections in the plan for quantities of solid waste generated, as well as for operating costs, are largely based on population projections, and thus remain accurate and require no revision.

The data included in the current CoSWMP regarding the following waste disposal sites remain substantially accurate:

TRANSFER STATIONS	LANDFILLS
Adin	Alturas
Canby	Eagleville
Davis Creek	Ft. Bidwell
Likely	Lake City
Newell	
Willow Ranch	

The remaining two sites are the Cedarville and Lookout Landfills.

Due to its unsuitable location, the Cedarville Landfill (West) was closed, and the Cedarville Landfill (East) was opened approximately 1 1/2 miles from the former location. These actions took place in November 1985. The administration and operation of the Cedarville (East) facility is substantially the same as the other county landfills.

Continued operation of the Lookout Landfill became infeasible due to the presence of a volcanic rock cap and lack of soil for cover. The landfill was closed and the Lookout Transfer Station was opened on the same parcel of land

in September 1985. The parcel in question was purchased by the county from the State of California. As these actions were scheduled to occur in the existing CoSWMP, and they do not constitute a substantial change in the county's management of solid waste, a revision of the plan in this regard is not necessary.

CONSISTENCY WITH STATE POLICY

The existing CoSWMP remains consistent with state standards and policies on solid waste management. The ordinances of the involved government entities remain adequate to fulfill the solid waste management requirements of the respective jurisdictions.

ECONOMIC CHANGES

Although there has not been a substantial change in county revenues, there has been a marked increase in the number of solid waste related programs mandated by the legislature. This is a problem for which the county is continuing to try to find solutions. At this time, none of the potential solutions have become county policy. Therefore, there is no reason at this time for a plan revision in this regard.

IMPLEMENTATION SCHEDULE

A list of the items mentioned in the CoSWMP implementation schedule follows, together with a narrative on the current status:

Construct and open Adin Transfer Station. This was accomplished before the 1984 plan revision, but inadvertently left in the implementation schedule.

Close existing Adin Landfill. See preceeding narrative.

Acquire land at Lookout Landfill either by purchase or lease from the State Lands Commission. As mentioned above, this was accomplished in June 1984.

Correct discrepancies on all of the disposal sites that are within our capability to correct. This has been, and will continue to be, an on-going process.

Construct and open Lookout Transfer Station. As mentioned above, this was accomplished in September 1985.

Close existing Lookout Landfill. As mentioned above, this was accomplished in September 1985. Lookout Landfill was removed from the State List of Non-Complying Facilities on July 31, 1986.

Open landfill operation in Lake City Area, one mile east of present landfill operation on county owned land. When it became necessary to close the Cedarville Landfill (West), it was the intention of the Department of Public Works to also close the existing Lake City Landfill and consolidate these operations into a single landfill in the Lake City area. This plan caused considerable outcry from the residents of Cedarville, and was therefore

abandoned. The Department instead opened the Cedarville Landfill (East) facility.

Close existing Lake City Landfill. See preceeding narrative. This was to be closed only because of the increased volumes expected from the Cedarville area. With the opening of the Cedarville (East) facility, the existing Lake City Landfill remains adequate to serve the residents of that area for a number of years.

Consideration is being given to moving the Cedarville Landfill from present location to a new site. As mentioned above, this was accomplished in November 1985.

Close existing Cedarville Landfill when new site is opened. Accomplished November 1985. The Cedarville Landfill (West) was removed from the State List of Non-Complying Facilities on July 31, 1986.

Establish proceedures to review all new land developement applications on a continuing basis, and assure provision of adequate disposal facilities. Such proceedures are currently being followed.

Review plan every three years to assure that solid waste management needs are being fulfilled and determine if feasible resource recovery technology is available for sparcely populated areas. This report is a result of the triennial review. The Department of Public Works is continuing to monitor literature in the field of resource recovery.

CURRENT AND FUTURE ADMINISTRATIVE RESPONSIBILITIES

Administration remains the same. The Department of Public Works continues to have the responsibility for the management of the solid waste program and of landfill and transfer station operation. Department personnel continue to transport wastes from the transfer stations to the landfill in department vehicles. The Environmental Health Division of the Modoc County Health Department continues to be the Local Enforcement Agency.

CHANGES IN FUNDING SOURCES

Modoc County continues to fund its solid waste management program utilizing general fund monies. There are currently no tipping fees or assessments for this service. In this respect, the CoSWMP continues to reflect current policy.

FUTURE FACILITIES

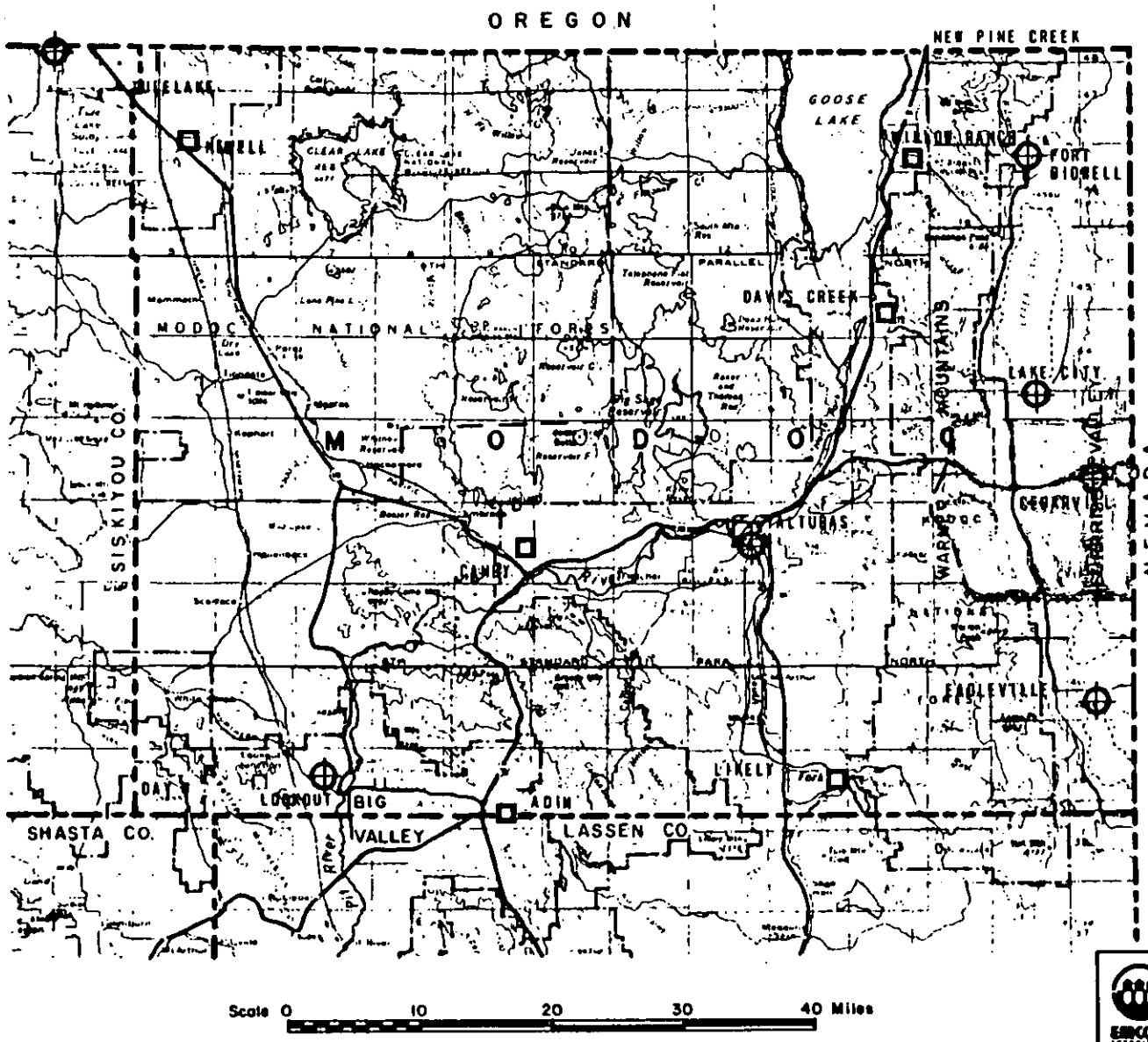
Based on projections, all current county landfills have sufficient capacity to continue to receive wastes through at least 1999. The county operates an ample number of landfills and transfer stations to serve the needs of residents. No future facilities are planned for the next three year review period.

PLAN ELEMENTS NOT IMPLEMENTED

All plan elements (implemented or not) were covered above in the section entitled IMPLEMENTATION SCHEDULE.

SUMMARY

The only deviations from the existing CoSWMP which have occurred do not constitute a substantial change in the methods for management of solid wastes in Modoc County. Since the time of the last plan revision three years ago, there have been no significant changes requiring plan revisions or ammendments.



LEGEND

EXISTING LANDFILL

TRANSFER STATION

MODOC COUNTY
SOLID WASTE MANAGEMENT PLAN
EXISTING MUNICIPAL WASTE SYSTEM
Figure 6

Attachment #4

CALIFORNIA WASTE MANAGEMENT BOARD
Resolution #87-12

Resolution of Acceptance Modoc County Solid Waste Management Plan Review Report.

WHEREAS, the Board finds that it has approved the revised Modoc County Solid Waste Management Plan on February 9, 1984, as meeting the requirements of the Nejedly-Z'Berg-Dills Solid Waste Management and Resource Recovery Act of 1972; and

WHEREAS, the Board finds that the County of Modoc has reviewed its County Solid Waste Management Plan and submitted a report to the Board pursuant to Government Code Section 66780.5(b); and

WHEREAS, the Board finds that the County of Modoc has determined that to be consistent with State Policy, the County Solid Waste Management Plan is in need of revision; and

WHEREAS, the Board finds that its staff has prepared a Staff Review and Comment which analyzes the effectiveness of the approved Modoc County Solid Waste Management Plan, in light of the Plan Review Report, in providing for current and future solid waste management needs in the County; and

WHEREAS, the Board has determined that the Enforcement Program Plan element of the Modoc County Solid Waste Management Plan needs to be revised.

WHEREAS, the Board finds that it has directed a copy of said Staff Review and Comment be sent to the Modoc County Board of Supervisors for their information.

NOW, THEREFORE, BE IT RESOLVED that the California Waste Management Board accepts the Modoc County Solid Waste Management Plan Review Report; and

BE IT FURTHER RESOLVED that the California Waste Management Board requires Modoc County to revise the Enforcement Program Plan element of their County Solid Waste Management Plan to render the Plan into full compliance with State Policy; and

BE IT FURTHER RESOLVED that the Plan Revision is due to this Board on December 23, 1987; and

BE IT FURTHER RESOLVED that the California Waste Management Board requires Modoc County to submit a timetable for preparation of the revisions, as required by Section 17141 of Title 14 of the California Administrative Code within the next 30 days.

CERTIFICATION

The undersigned Chief Executive Officer of the California Waste Management Board does hereby certify that the foregoing is a full, true and correct copy of a resolution duly and regularly adopted at a meeting of the California Waste Management Board held on March 26-27, 1987.

Dated:

George T. Eowan
Chief Executive Officer

CALIFORNIA WASTE MANAGEMENT BOARD
Agenda Item #6
March 26-27, 1987

ITEM:

Status of Delinquent County Solid Waste Management Plans (CoSWMPs)

KEY ISSUES:

- 53 CoSWMPs are complete and current.
- 3 CoSWMPs are technically "delinquent" as compared to 31 in June, 1985.
- 1 CoSWMP Revision, Alameda, will be considered at this Board meeting.
- 1 CoSWMP Revision, San Diego, will be considered at the Board's April, 1987, meeting.
- Mariposa CoSWMP Revision is scheduled to be resubmitted in April, 1987.
- Marin CoSWMP Revision is scheduled to be resubmitted in May, 1987.

BACKGROUND:

Staff has prepared an update to the previous CoSWMP Revision status reports. This status report is divided into three sections, according to the degree of Plan completion:

Section I is a listing of fifty-three (53) counties with complete and current Plans. The date of the next Plan Review Report is also included.

Section II includes two (2) counties that have recently submitted a CoSWMP Revision to the Board.

Section III is a listing of two (2) counties that have brought Revisions to the Board for approval, but the Board has disapproved the Revisions and set dates for resubmittal.

I. The following counties are current. The date of the next Plan Review Report is listed below.

1.	Contra Costa**	Revision in Progress
2.	Kings**	Revision in Progress
3.	San Francisco*	Sept.1986
4.	Kern+	Nov. 1986
5.	Sacramento++	Jan. 1987
6.	Mendocino+++	Feb. 1987
7.	Modoc***	Feb. 1987
8.	Solano*	Feb. 1987
9.	Humboldt	June 1987
10.	Napa*	June 1987
11.	Riverside	July 1987
12.	Plumas	Oct. 1987
13.	Sutter-Yuba	Nov. 1987
14.	Siskiyou	Dec. 1987
15.	Del Norte	Dec. 1987
16.	San Mateo	Dec. 1987
17.	Glenn	Jan. 1988
18.	Orange	Feb. 1988
19.	Madera	Feb. 1988
20.	Alpine	Mar. 1988
21.	Imperial	Apr. 1988
22.	Amador	May 1988
23.	Santa Cruz	June 1988
24.	Nevada	June 1988
25.	Shasta	June 1988
26.	El Dorado	June 1988
27.	Ventura	July 1988
28.	Lake	Aug. 1988
29.	Santa Clara	Aug. 1988
30.	Inyo	Aug. 1988
31.	Mono	Aug. 1988
32.	San Benito	Aug. 1988
33.	Fresno	Sept.1988
34.	Tuolumne	Oct. 1988
35.	Yolo	Nov. 1988
36.	Trinity	Nov. 1988
37.	Tehama	Dec. 1988
38.	Butte	Dec. 1988
39.	Placer	Jan. 1989
40.	Monterey	Feb. 1989
41.	Los Angeles	Mar. 1989
42.	Sonoma	Apr. 1989
43.	San Bernardino	May 1989
44.	Stanislaus	June 1989
45.	Lassen	July 1989
46.	Merced	July 1989
47.	Santa Barbara	Sept 1989
48.	San Joaquin	Oct. 1989
49.	Calaveras	Dec. 1989
50.	San Luis Obispo	Dec. 1989
51.	Tulare	Dec. 1989
52.	Colusa	Dec. 1989
53.	Sierra	Jan. 1990

* Board staff is reviewing the Plan Review Report.
** Currently preparing the second Revision.

*** Board will consider acceptance of Plan Review Report at this Board meeting.

+ The Plan Review Report was done on November 17, 1986. In February 11, 1987, Board staff informed County that the Plan Review Report was overdue.

The County has prepared a draft Plan Review Report, which will be reviewed by the Solid Waste Advisory Committee in April. The final Plan Review Report should be submitted to this Board by the end of April.

++ Sacramento County's Plan Review Report was due in January, 1987. Staff has already received a preliminary assessment of the Report. The County has indicated a need to revise and has committed staff for the revision.

+++ County has submitted a Draft Plan Review Report.

II. Recently Submitted CoSWMP Revisions

Two counties, Alameda and San Diego, have submitted CoSWMP Revisions. The Alameda CoSWMP Revision will be considered at this Board meeting, the San Diego CoSWMP Revision at the April Board meeting.

III. Disapproved Revisions

County	Original Date Revision Due	Date Revision Submitted	Date of Resubmittal
Mariposa	March 1981	December 6, 1985	April 1987
Marin	March 1984	August 24, 1986	May 1987

Mariposa and Marin counties have previously submitted final CoSWMP Revisions to the Board. Both CoSWMP Revisions have been disapproved by this Board. Below is specific information on each county's CoSWMP Revision status:

Mariposa County

09/22/86

The Board postponed approval of the CoSWMP Revision until the April, 1987, meeting to allow information from consultant's study to be incorporated into the CoSWMP Revision.

11/21/86

Letter sent by Board informing County of action on CoSWMP Revision.

1/21/87

Staff met with the CoSWMP Liaison and a member of the Planning Department to discuss the incorporation of information from the consultant's study into the CoSWMP Revision and the remaining requirements for submitting the CoSWMP Revision.

02/20/87

Consultant's study was submitted to County.

03/04/87

County Task Force met to review consultant's study and to extrapolate relevant study information for the CoSWMP Revision. Board staff in attendance.

04/15/87

New submittal date for CoSWMP Revision.

Marin County

11/11/86

Board disapproved CoSWMP Revision because it was inadequate in a number of areas.

12/05/86

Letter from Board sent notifying County of Board action.

02/23/87

Staff phoned the CoSWMP Liaison, Mr. Eric Borgwardt of the Marin County Planning Department. He stated that the Draft CoSWMP Revision was being reviewed internally.

05/11/87

New submittal date for CoSWMP Revision.

CALIFORNIA WASTE MANAGEMENT BOARD
AGENDA ITEM # 7
March 26-27, 1987

ITEM:

Report on the Status of the Contra Costa County Plan Revision and Progress of County Landfill Replacement Siting Efforts

- Plan Revision is due June 22, 1987.
- County indicates intention of submitting a Plan Revision on time but with capacity only through 1991 for the entire County's waste generation, capacity needed in one region within 3 months, and no replacement landfills.
- Landfill siting effort completion delayed at least 6 months by Board of Supervisors' "Blue Ribbon Task Force" study. County staff states Plan would be delayed 6 months to 1 year from due date if sites are included.
- County indicated in August, 1986 Plan Report that new landfills would be sited prior to Plan Revision. Additional time prior to Board action on the Plan Review Report was provided to assure replacement siting within 270 day Revision period.
- Current Board of Supervisors' policy requires General Plan land use designation prior to CoSWMP landfill designation.
- Landfill capacity is needed to replace Acme Landfill which currently has 3 months remaining capacity. No approved alternative disposal yet provided. Current alternative disposal capacity is tentative and out-of-County.

BACKGROUND:

Following a suggestion by the Board's Chief Executive Officer, Contra Costa County has requested this opportunity to address the Board on their Plan Revision efforts to date and to inform the Board of landfill siting effort delays. These siting delays may complicate the County's compliance with both the 270 days allowed by the Board for Plan Revision and the Board's approved Plan Review Report requirements for Plan Revision content.

Contra Costa County has offered to complete a Plan Revision without replacement landfill capacity within the allotted Revision time. They are prepared to begin the circulation of a draft Plan Revision on April 1, 1987 which does not include the replacement sites. This would allow completion of circulation and local approval of the Plan Revision by the June 22, 1987

deadline.

Staff has expressed concern to the County regarding the adequacy of such a Plan Revision and its compliance with the Government Code, the Board's regulations, and the Board's action on the Plan Review Report. The County has responded that they must extend their Plan Revision beyond the 270 days to include the currently proposed landfills.

I. HISTORY:

A. Initial Plan Review Report Submittal

On November 19, 1985, the County submitted a Plan Review letter indicating the need for a Plan Revision (Attachment #3-2). This letter was submitted prior to the third anniversary of the Plan Revision as required by Section 17141 of Title 14, Chapter 2, CAC. In that review letter, the County requested the Board staff's advice on how to include their proposed new facilities in the Plan.

At that time, the County was on a fast track landfill siting schedule because of the need for capacity to replace the Acme Landfill, which closes in June, 1987. However, the County Board of Supervisors also set a policy that none of the proposed private landfill sites should be designated in the CoSWMP until all local land use approvals have been received. Those approvals would not have occurred within 270 days from November, 1985.

In this initial submittal, the County proposed to revise the Plan without including adequate disposal capacity for the short term Planning period. They proposed to subsequently include each new facility through the Plan Amendment process, following local land use approvals.

Staff Response

Staff advised the County that a Plan Revision which did not provide for short term disposal capacity could be not approved as a revised County Solid Waste Management Plan (CoSWMP). Full approval of partial Revision with subsequent Amendments for needed landfill capacity would not meet the requirements of the Government Code.

Furthermore, revising the CoSWMP without including short term disposal capacity would violate State Policy regarding County Solid Waste Planning. Staff felt that such a Plan Revision might well send the message that the Board sanctioned case-by-case facility permitting without foresight in disposal capacity planning. The CoSWMP is intended to include a comprehensive future facilities planning process and an implementation schedule for this process.

B. Revised Plan Review Report Submittal

On August 11, 1986, the County submitted a Revised Plan review letter, updating their current siting status and indicating their desire to begin the agreed upon comprehensive Revision process (Attachment 3-3). At that time, the County indicated that they would be able to complete a Plan Revision by June, 1987, which would include the new landfill sites. This is within the 270 day Revision period allowed by the Government Code.

In addition, the County indicated their intent to amend the current CoSWMP during the Revision process to provide disposal capacity after Acme Landfill closes. This Amendment would likely involve the exporting of waste to another county.

II. ACTIONS SINCE THE PLAN REVIEW REPORT

Initially, on October 15, 1986, the County responded to the Board's Plan Report workplan request in October, 1986 with a 9 month (270 day) work schedule. Shortly thereafter, this schedule was revised to indicate that an additional 2 months would be necessary. Staff responded that a workplan which met the 270 day schedule was necessary. During this same time period, one of the three proposed landfill sites was withdrawn and additional concerns were raised regarding the other two sites. On January 30, 1987 the County responded to our request for a 270 day work plan with the initial October, 1986 workplan (Attachment 1).

However, this letter also indicated that the landfill siting decisions of the Board of Supervisors had been "put on hold" for a period of six months, ending in mid-June, 1987. During this period a special new "Blue Ribbon Task Force" will review the two remaining proposed sites, other previously studies landfill sites in the Southeast area of the County, and other potential landfill replacement sites.

Because of this delay, the County indicated that any workplan to comply with the 270 day requirement would need to exclude the replacement sites. Sites would then be included by subsequent Plan Amendment when they were approved. The County indicated that they would prefer to delay the formal Plan Revision efforts until the Board of Supervisors determines the future landfill sites. They indicated that this could take six month to one year.

The County staff has indicated that they are prepared to provide information of the specific status and progress of individual replacement landfill siting activities at whatever level of detail is requested by the Board.

The current intention of the County staff is to begin formal circulation of a draft Plan Revision, without new landfill replacement sites, in late April, 1987 in an attempt to provide the Board with a Plan Revision by the June 22, 1987 deadline for the 270 days. Staff's most recent response to the County on February 25, 1987 is included in Attachment 2.

III. ISSUES WHICH MAY BE RAISED BY THE COUNTY PRESENTATION:

- First, there is the question of whether the County should maintain its policy not to designate the proposed landfill sites in the CoSWMP prior to designation of the site in the General Plan. Part of the reason that Board staff did not object strongly to the initial delay prior to the Plan Report was to allow for the County's General Plan designation of these proposed sites.

  The Government Code does not require General Plan designation of landfill sites until the time of landfill permitting. It does, however, allow for the a mechanism for the Counties to do so if they so desire. The Planning Guidelines of Chapter 2, Title 14 do require that the CoSWMP include facilities. Facilities for short term disposal are required to be designated in a manner "specific enough for implementation". In the case of Contra Costa County, these new facilities may be needed within the next six months. Even if the Acme facility is expanded to allow for another two years operation, as has been discussed, this two years will be necessary to for permitting the developing the site prior to its accepting refuse.

  Based on this immediate need, it may be the continued determination of the Board of Supervisors that the General Plan designation of landfills prior to their inclusion in the CoSWMP is necessary to make the new landfill sites " specific enough for implementation".

- Second, there is the related issue of the approvability of a CoSWMP without short term replacement landfill capacity. Staff has informed the County of the Board's concern regarding lack of planning for short term disposal capacity in other Counties. In Contra Costa County, the current question is not a matter of delay in beginning siting efforts, it is a matter of whether these efforts are completed and included in the CoSWMP Revision.

- Third, there is the issue of the acceptability of the other alternative considered by the County: delaying the Plan Revision progress until the siting process mandated by the Board is completed. This would, by the County's own admission, extend the Plan Revision submittal to the Board well beyond the 270 days allowed for Plan Revision by Title 14, Chapter 2, Section 17152 and result in a delinquent

County Plan. Currently, the Board has no regulatory provision for formally providing additional time for completion of a Plan Revision.

RECOMMENDATION:

Information Item; Introductory to County Presentation; No Action Required

ATTACHMENTS:

1. Letter from Contra Costa County submitting revised Plan Revision Work Program, indicating delays in replacement landfill siting process and County's intent to prepare a Plan Revision without new landfill sites. Dated January 30, 1987.

2. Board staff letter of reply, acknowledging revised Plan Revision Work Program, expressing concern regarding a Plan Revision without new landfill capacity, and inviting the County to address the Board. Dated February 25, 1987.

3. Board-Approved Contra Costa Plan Review Report, dated September 30, 1987 with County submittals as Attachments 3-2 and 3-3.

FEB - 4 1987

Community
Development
Department
County Administration Building, North Wing
P.O. Box 951
Martinez, California 94553-0095

Phone:

Contra
Costa
County

Harvey E. Bragdon
Director of Community Development

ATTACHMENT 1

January 30, 1987

File: R 38E

Mr. George Eowan
Chief Executive Officer
California Waste Management Board
1020 9th Street, Suite 300
Sacramento, CA 95814

Dear Mr. Eowan:

This letter is in response to your December 26, 1986 letter regarding the revision to the Contra Costa County Solid Waste Management Plan (COSWMP). In that letter, you requested a schedule for completion of the plan revision by the 270-day time limitation required in the California Administrative Code. Attached is a schedule for completion of the plan revision within that timeframe. We wish to inform you that delays have occurred in completing the plan revision and that the 270-day time limit may be slightly exceeded.

In a recent development since our last letter to you, delays have occurred in a decision-making process for identification of new landfills. The Board of Supervisors has appointed a Blue-Ribbon Task Force to review proposed and potential landfill sites. The Task Force is not expected to complete its work until June of 1987. Concerning the privately proposed landfill sites undergoing land use entitlement hearings before the County Planning Commission one proposal, Central Landfill, has been withdrawn. The two other applications have been set for hearings in late March and early April. In order to meet the attached schedule, we will not be able to identify future landfill sights in the plan revision. We propose that the plan revision include the process the County is now undergoing to identify future landfill sites. Any future landfill site would require an amendment to the revised plan. This is the only method the County can use to reasonably meet the 270-day timeframe.

The County would prefer to delay working on the revision until the County determines future landfill sights. However, your staff has stated that such a delay, which could be six months to

one year beyond the 270-day limit, is not acceptable.

We will keep your staff informed as to the County's progress in completing the plan revision.

If you have any questions, please contact me at 415-372-2071.

Very truly yours,

David Okita

David B. Okita
Senior Civil Engineer

DB:clm
okita8.jan
cc: Solid Waste Commission
Attachment

October 15, 1986

SCHEDULE FOR REVISIONS AND AMENDMENTS TO COUNTY SOLID WASTE MANAGEMENT PLAN

Plan Revision Schedule

September	22, 1986	- California Waste Management Board approves Plan Review Report.
November	19, 1986	- Draft revision discussed by TAC.
January	21, 1987	- Solid Waste Commission recommends release of draft to cities.
February	3, 1987	- Board of Supervisors releases draft for city review.
February	1987	- Three public meetings.
March	1987	- Solid Waste Commission recommends approval of revision to Board of Supervisors.
April	1987	- Board of Supervisors approves revision and sends to cities for approval.
June	22, 1987	- Notice of city and county approval to California Waste Management Board for California Waste Management Board approval.

STATE OF CALIFORNIA

GEORGE DEUKMEJIAN, Governor

CALIFORNIA WASTE MANAGEMENT BOARD
1020 NINTH STREET, SUITE 300
SACRAMENTO, CA 95814

ATTACHMENT 2

FEB 25 1987

David Okita
Contra Costa County
Community Development Department
P.O. Box 951
Martinez, CA 94553

RE: Revised Plan Revision Time Schedule

Dear Mr. Okita:

Thank you for your January 30, 1987 response to my request for an acceptable time schedule for a Plan Revision which meets the 270 day time requirement. I am encouraged to hear of County efforts to complete the Revision within the required time prior to the June 22, 1987 deadline. I recognize that landfill site selection is not only critical to a County Solid Waste Management Plan, but also involves several other forums of local decisionmaking and land use entitlements which require considerable time and effort. In addition, the County's effort to keep the Board informed of its progress in siting new landfills is appreciated.

Although I accept that the Plan Revision timetable submitted meets the 270 day time requirement of the California Administrative Code, I am concerned by your indication that the delay in siting efforts may result in incomplete compliance with the County-submitted and Board-accepted Plan Review Report and the Board's inability to approve the resulting Plan Revision. Designation of adequate landfill capacity, for at least the short term planning period, is a critical portion of any Plan Revision and is recognized as such by the Planning Guidelines in Title 14, California Administrative Code, Chapter 2 and the Board's Policy for Solid Waste Management. Without adequate disposal capacity, or an agreement for waste export, the County may lack the means to assure adequate disposal capacity to meet the essential solid waste service needs of its citizens.

Because of my concern regarding the effect of your delayed landfill siting efforts on the content of your Plan Revision, I intend to apprise the Board of your situation. As a result, you may be asked to appear before the Board in the near future to explain the County's siting situation. I will keep you informed regarding any proposal to invite the County to formally

address the Board on this matter. I ask that you in return keep me informed of the County's progress with its landfill siting decisions and of the Siting Task Force activities.

If you have any questions regarding our reply, please feel free to contact me at (916) 322-3330.

Sincerely,

Original signed by:
George T. Eowan

George T. Eowan
Chief Executive Officer

CALIFORNIA WASTE MANAGEMENT BOARD
Agenda Item #3
September 22 - 23, 1986

Item: Consideration of Acceptance of the Contra Costa County Solid Waste Management Plan Review Report.

Key Issues:

- County's Plan Review letter submitted November 20, 1985 and Revised August 11, 1986.
- Plan Review Report deferred to allow completion of landfill siting process during 270 day revision period.
- County Policy gives private landfill activities priority; three private sites undergoing local review.
- Siting process caused by unexpected smaller capacity at Acme Landfill.
- County will amend current CoSWMP during Revision period to provide capacity after Acme closes in June 1987.
- Completion of siting process prior to Plan Revision deadline necessary to provide adequate short term disposal capacity in Plan Revision and meet Government Code requirements.
- County and Board staff agree to need for Plan Revision.
- Plan Report requires revisions beyond siting designation to update other aspects and programs of CoSWMP.
- County will submit schedule within 30 days for interim disposal solutions (Amendment) and landfill siting (Amendments) to occur prior to Plan Revision (submitted with Revision Work Program).

Background:

The Contra Costa County Solid Waste Management Plan (CoSWMP) was originally approved by the California Waste Management Board (CWMB) on March 25, 1977. The first revision to the Plan was approved by the Board on December 15, 1982. Contra Costa has reviewed the Plan to determine its consistency with State Policy and to assess the need for a Plan Revision.

On November 19, 1985, the County submitted a Plan Review letter indicating the need for a Plan Revision (Attachment 3). This letter was submitted prior to the third anniversary of the Plan Revision as required by Section 17141 of Title 14, Chapter 2, CAC. In that review letter, the County requested the Board staff's advice on how to include their proposed new facilities in the Plan.

County Landfill Siting Process

The County is on a fast track landfill siting schedule due to the need for capacity to replace the Acme Landfill, which closes in June 1987. However, the County Board of Supervisor s has also set a policy that none of the private landfill sites should be designated in the CoSWMP until all local land use approvals have been received. Those approvals would not have occurred within the 270 days from November, 1985.

Therefore, the County proposed to revise the Plan without including adequate disposal capacity for the short term Planning period. They would then subsequently include each new facility through the Plan Amendment process.

Staff Response

Staff advised the County that a Plan Revision which did not provide for short term disposal capacity would not be approvable as a new County Solid Waste Management Plan. Full approval of partial revision with subsequent Amendments for needed landfill capacity would not meet the requirements of the Government Code.

Furthermore, revising the Plan without including short term disposal capacity would violate State Policy regarding County Solid Waste Planning. It might well send the message that the Board sanctioned case-by-case facility permitting without foresight in disposal capacity planning through a comprehensive future facilities planning process and implementation schedule in the County Solid Waste Management Plan and its periodic Revisions.

County's Present Planning Approach

The County has chosen a Revision approach which is both consistent with the siting schedule approved by the Board in September 1985 and allows for siting process completion prior to submittal of a Plan Revision. Contra Costa County has now made substantial progress in their local landfill siting process.

On August 11, 1986, the County submitted a Revised Plan review letter, updating their current siting status and indicating their desire to begin the agreed upon comprehensive Revision process (Attachment 2). **If this Plan Report is accepted, the County has indicated that they will be able to complete a Plan Revision by June 1987, which will include the new landfill sites. This is within the 270 day Revision period allowed by the Government Code.**

In addition, the County plans to amend the current CoSWMP during the Revision process to provide disposal capacity after Acme Landfill closes in June 1987. This Amendment will most likely involve the exporting of waste to another County. The Amendment is necessary because the Revision will not be due to the Board for approval until June 1987 and there could be a short period between submittal and Board approval when waste now going to Acme would have to be landfilled elsewhere.

Staff Analysis

The attached Staff Review and Comment analyzes the adequacy of the Contra Costa County Plan Review Report and provides the Board with an objective description of the current solid waste management program in Contra Costa County. Staff's analysis entailed review of both the Plan and the Plan Review Report, meeting with solid waste officials and visiting the solid waste facilities in the County.

Attachment #1 provides a detailed description of the current solid waste program in Contra Costa County and staff's enumeration of the needed changes and updates to be included in the Plan Revision.

Options for Board Action:

1. Do Not Accept the Plan Review Report

   This would be appropriate if the County had not complied with Board requirements for preparation of the Plan Review Report.

2. Take No Action

   No logical purpose would be served by delaying action on the Plan Review Report.

3. Accept the Plan Review Report and Concur with the County's Decision to revise the Plan and Staff's Recommendation on Revision Content in Attachment #1.

   This option would be appropriate, if the County has complied with the Board's requirements for preparation of a Plan Review Report and the Board concurs with Staff's Recommendations for Plan Revision. The County has met all requirements for preparation of a Plan Review Report.

Staff Recommendations:

Staff recommends the Board select Option 3 and adopt Resolution #86-62 accepting the Contra Costa County Plan Review Report and requiring the County to revise the Plan as indicated in Attachment 1.

Attachments:

1. Staff Review and Comment

2. Contra Costa County Solid Waste Management Plan Review letter dated August 11, 1986

3. Earlier November 19, 1985 Plan Review letter, requesting staff advice on means to coordinate Plan Revision and local landfill siting program

4. Resolution #86-62 accepting the Contra Costa County Plan Review Report

Staff Review and Comment

Contra Costa County Solid Waste Management Plan

Review Report

I. County Solid Waste Management System

A. Current System

1. County Characteristics

Contra Costa County, located on the northeast portion of San Francisco Bay, contains 710 square miles of land and a population approximately 724,000. Terrain in the County varies from Bay frontage in the west near Richmond to the steep hillsides of the Diablo Range near Concord and Walnut Creek in the central County, and the Delta terrain on the San Joaquin River east of Antioch. Two different climatic regions exist in the County with marine climate on the western bay frontage and climate similar to the Central Valley in the eastern two thirds of the County.

Contra Costa County is a regional center for the Bay Area petroleum refining and chemical industry, steel and metals production, and electric power generation.

2. Administrative Responsibilities

a. Solid Waste Planning

The Contra Costa County Board of Supervisors is ultimately responsible for solid waste planning and administration. The Board has appointed a Solid Waste Commission to advise them on policy and technical matters. In turn, a Technical Advisory Committee has been appointed by the Commission to provide technical assistance to them.

The Community Development Department serves as staff to the Board of Supervisors for the preparation and maintenance of the County Solid Waste Management Plan. They are also support staff to the Solid Waste Commission.

b. Enforcement

The Environmental Health Division of the County Health Department, as the agency, responsible for permitting solid waste facilities and inspecting and enforcement at these facilities, is responsible for the enforcement program plan portion of the CoSWMP.

3. **System Financing**

Solid Waste planning activities are funded through an assessment on solid waste facilities operators of $0.16 per ton as allowed by Government Code section 66784.3.

Both landfill enforcement activities and those of the storage and collection vehicle inspection are funded through a $0.15 per ton enforcement fee assessed to landfill operators.

Collection activities are provided through privately financed franchise collectors. Disposal sites similarly are private facilities which operate on revenue from gate fees and are self supporting.

4. **Waste Generation and Disposal Volumes**

Approximately one million tons per year is disposed of in Contra Costa County. This includes municipal solid waste generated within the County, waste imported to the County and sewage sludge. Approximately 2,600 tons per day or 949,000 tons per year is disposed of at the County's three major municipal landfills.

Not all of this waste is generated in the County. Approximately 219,000 tons per year or 600 tons per day is imported from surrounding Counties as described in disposal section.

Based on the 727,445 tons per year generated within the County, a waste generation rate of about 5.5 lbs./capita/day results. The County estimates that approximately 42 percent of this waste is from residential sources, 28 percent is commercial waste, 18 percent is construction and demolition waste, and 12 percent is industrial waste.

5. **Collection**

Fifteen of the Nineteen cities, 7 sanitary districts and two services districts franchise the collection of municipal solid waste for their respective jurisdictions within the County. Under current agreements, only two jurisdictions, the City of Concord and the Central Contra Costa County Sanitary District, have retained the right through these franchises to direct the disposal locations of these wastes. Of the two new cities one has indicated their desire to franchise collection while the other intends to maintain Central Sanitation District franchising.

6. **Transfer**

No transfer stations are currently utilized in the County. Previously, waste entered the County from the Berkeley Transfer Station in Alameda but this waste is now directed to the Vasco Road Landfill. Contra Costa County anticipates the need for transfer station with the replacement of the current landfills with new landfills in the less populated eastern portion of the County. One proposal for such a transfer station, at the Acme landfill site, has already been made to the County.

7. **Disposal**

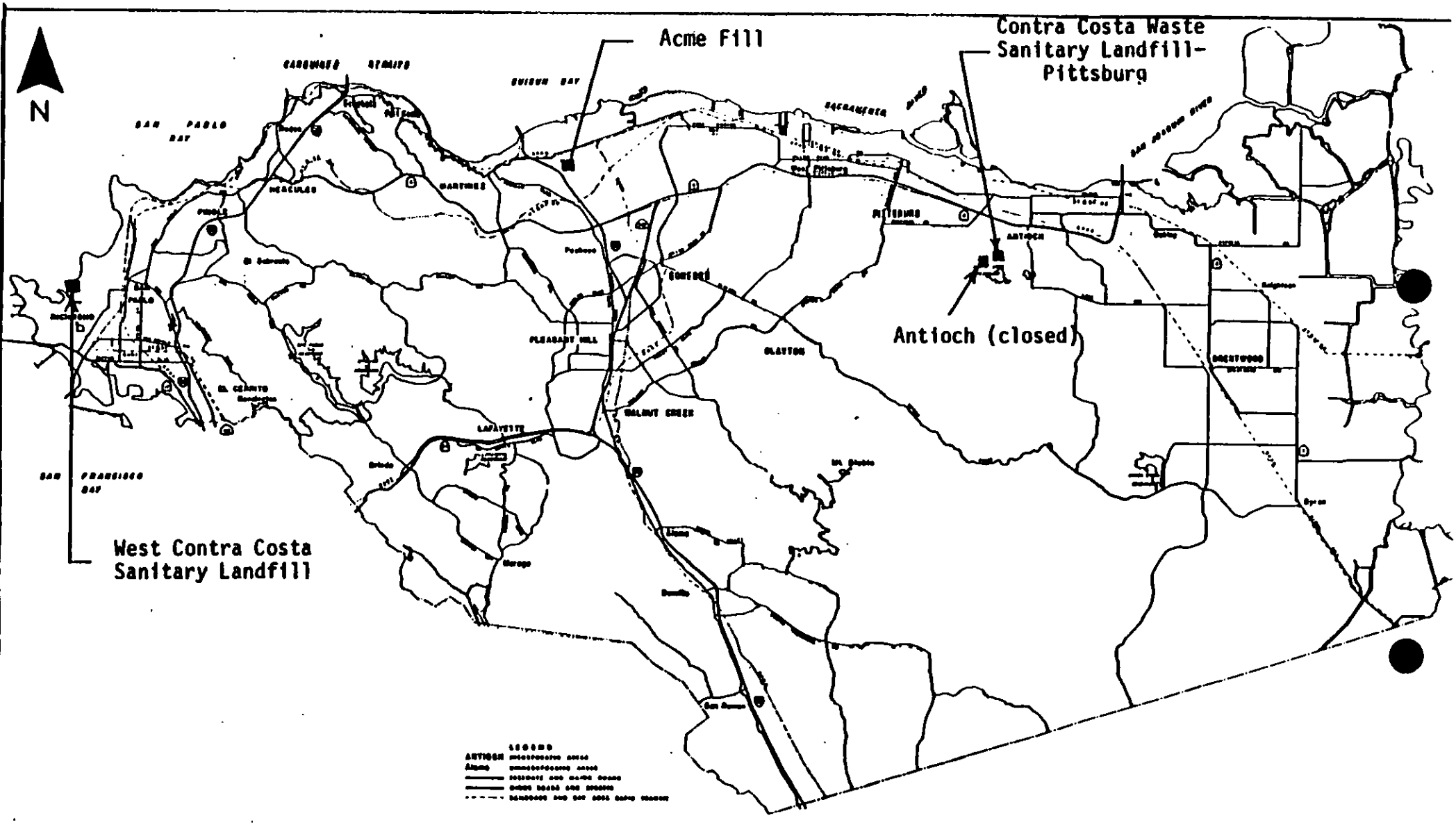
Three landfills serve Contra Costa County at this time:

These are: The West Contra Costa Landfill in Richmond, The Acme Landfill in Martinez, and the GBF / Pittsburg landfill near Antioch. While the latter is permitted as two sites, it the Pittsburg portion of this site is inactive, with closure activities pending. A map locating these facilities and summary table of their daily tonnage, site life and service area follow:

Contra Costa County Disposal Site Summary

NAME	LOCATION	TONS/ DAY	ACRES	CLOSURE DATE	AREA SERVED
ACME LANDFILL	EAST OF HWY 680 NEAR MARTINEZ	1,200	244	June 1987	Central and South County Rodeo, West Pittsburg, Antioch, Benecia
WEST CONTRA COSTA LANDFILL	OFF PARR BLVD, RICHMOND	1,100	200	1993	Western Contra Costa County, except Rodeo, Southern Marin Co., Berkeley Commercial Wastes
CONTRA COSTA WASTE (GBF/PITTSBURG) LANDFILL	SOMMERSVILLE ROAD ADJACENT TO CITY OF ANTIOCH	550	75	1992	Eastern Contra Costa, except West Pittsburg and Antioch, parts of Concord

Note: Inactive Pittsburg landfill is 25 acres and not included in above GBF acreage number.



CONTRA COSTA COUNTY
CALIFORNIA

SANITARY LANDFILLS IN CONTRA COSTA COUNTY

In addition, wastes from Marin County (approximately 92 tpd) Benicia (Solano County, 150 tpd) and commercial wastes from the City of Berkeley (Alameda County, 250 tpd) sewage sludge from San Francisco and demolition from throughout the Bay Area are disposed of at the West Contra Costa Landfill in Richmond.

Additional Waste Disposal Methods:

In addition to the above disposal sites, sewage sludge is incinerated at the Central Contra Costa Sewage treatment plant. Some industrial and agricultural operations also utilize onsite disposal techniques.

8. **Litter Management**

Three approaches to litter control occur in the County. Public streets and parks litter abatement programs are largely handled by the incorporated Cities or the managing public entity. Litter control at the landfill sites is conducted by the private operators of these sites in order to comply with minimum standards for landfill operation.

Litter control on the road in the general vicinity of landfills or utilized to access is conducted by the County Public Works Department. This program, which utilizes County jail trustees to clean up roadways in the general vicinity of landfills, was made possible through a Board litter control grant which provided a van for trustee transport to work locations.

9. **Resource Recovery**

Recycling

While Contra Costa County has a variety of recycling programs, it is difficult to provide an accurate estimate of the total volume or percentage of waste recycled within the County. Estimates of the volumes handled by the major programs are available and follow.

E. C. Ology , El Cerrito - 447 tons/month. Sixty percent participation in curbside recycling program with an additional 10% participation in the drop off recycling. The curbside portion of this operation serves El Cerrito, Albany and Kensington. This portion of this program was once funded through a mandatory residential collection surcharge. This surcharge was changed to an voluntary assessment of $0.50 per month, but still maintains a high percentage of patrons.

In addition to the buy back recycling center in El Cerrito, satellite drop off centers are located in El Cerrito and Albany. E.C. Ology also provides pick up of paper goods from commercial businesses.

Martinez Sanitary Service has also developed curbside residential recycling pickup in the City of Martinez.

Many Hands Inc. 85 tons / month. Located between Pittsburg and Antioch, this program serves as a rehabilitation program for the the mentally disabled. Mental Health funds are utilized to subsidize supervision and operations. Materials are picked up from more than 200 businesses on a donation basis. Materials volumes handled are above both the amounts anticipated when Board grants were received. This has increased from 45 tons per month at the time of the last Plan Revision.

Contra Costa Community Recycling Center Located outside Martinez in Pacheco, this program is a drop off recycling operation for donated recyclables.

Valley Disposal Recycling Center, City of Walnut Creek. This is also a dropoff recycling operation operated by the Boy Scouts of America on City owned property with facilities provided by Valley Disposal Service.

At least twelve other smaller or single product recyclers exist in the County. These include four beverage companies collecting aluminum cans at various locations, two scrap metal wholesalers, three newsprint and paper recyclers, and several school, charitable and non-profit groups who maintain material drop off locations.

Although the County has does not audit recycling activities on a continuous basis, staff have indicated that they intend to study current programs in the County and means to increase recycling as a technical support document to the proposed Plan Revision. The Board of Supervisors has a budget allocation of $30,000 for evaluating recycling options for inclusion in the County Solid Waste Management Plan. This study is intended to identify programs that should be established and means to get them implemented by local jurisdictions of the County.

Waste to Energy Projects:

Two waste-to-energy project proposals have been explored extensively for the last several years. These were the Central Contra Costa Sanitary District project in the Concord area and the West County Authority Project in Richmond.

The Central County project, initially proposed to handle a large quantity of sewage sludge, has been found not currently economically feasible and is not being actively pursued. This project was proposed to be a 900 ton per day, 20 Megawatt plant to serve the Concord and Walnut Creek area. Since the initial feasibility study which indicated the sludge handling potential was more limited, the Sanitation district has left pursuit of the project to the County.

No project design agreements or energy contract have been negotiated to date and no development date is projected. The Sanitation district is currently incinerating sludge instead.

The second waste-to-energy project, the West County project, is proposed to serve five cities on including Richmond, El Cerrito, Hercules, Pinole and San Pablo, is being pursued through a Joint Authority Powers Authority of these cities and the West Contra Costa Sanitation District. The project, has been proposed at several different sizes, the most recent being approximately 750 tons per day, with 55 tons per day of this being sewage sludge. A Standard Offer #4 energy agreement was reached with Pacific Gas and Electric for the 900 ton per day 21 MW project which will expire in 1988.

Waste agreements and development decisions will need to be reached in the next few months to make meet this deadline for having power on line. Negotiations are now underway with P.G.& E to extend this agreement deadline and the cities are reassessing their level commitment to the project. If either of these factors are lacking, the project could become inactive as short term alternative within the next year. As indicated above, landfill capacity is being pursued in the absence any certainty for waste to energy development.

B. **Future Facilities**

Because of unanticipated shortening of the expansion potential of the Acme Landfill and the diminishing landfill capacity at the County's two other sites, replacement capacity siting is a major concern of Contra Costa County. Several steps have are underway to develop options for new landfill capacity. These new sites will be locally approved and included in the Plan by Amendment prior to the new Plan Revision.

Efforts toward future disposal capacity in the County are taking three forms. First, the County is making arrangements for short term disposal arrangements to provide for interim capacity while siting replacement capacity for the Acme Landfill. Acme Landfill is scheduled to close in June 1987. Any new site approved will take at least a year thereafter to be operational and on line even if the siting land use planning is completed within the next nine months.

Second, the County is reviewing three local land use permits for new private proposals for replacement landfill capacity. Any or all of these sites will be subsequently amended into the CoSWMP prior to the completion of Plan Revision as they receive local land use permits. They will then be included in the Plan Revision Disposal Element as new landfill sites and reserved landfill capacity.

Third, the County has made efforts to identify potential sites for a public siting process if the private sites now being proposed are not able to obtain local land use approval. Two studies of these secondary alternative sites have been completed.

Contingency Planning

The County is currently pursuing interim disposal capacity to relieve shortage ensuing from the June 1987 Acme Landfill closure. Negotiation to determine the location of this replacement capacity is not now complete. However, this capacity may well have to be utilized before the County completes their Plan Revision. Two activities are planned during the revision process to inform the Board of interim capacity agreements and formalize these planning efforts.

First, the County has agreed to include their interim disposal agreement into the solid waste current County Solid Waste Management Plan via Plan Amendment. Second, the County has agreed to include a schedule with their Plan Revision work program, to be submitted within 30 days of the Plan Report acceptance, that will inform the Board of the County's schedule for both the interim capacity agreement Plan Amendment process and the new landfill site Plan Amendments.

Current indication by the County is that is their intention to utilize out-of-County capacity as much as possible following Acme Landfill closure and preceding operational preparation of new landfill sites. The most likely alternative for this disposal would be Alameda County and discussion is currently underway with Alameda County regarding an Amendment to the Alameda County CoSWMP to allow for import of this waste. The disposal site to be utilized in Alameda County is now uncertain but will be determined prior to the submittal of Contra Costa County's described interim capacity Amendment. The disposal sites in Alameda County with the largest remaining capacity available are the Altamont Landfill and the Vasco Road Landfill.

Other possible out-of-County related options would include extending the Acme Landfill capacity by stopping the import of waste from Solano County and possibly exporting in a short term arrangement to Solano County.

In-County options would include the diversion of waste now going to Acme to the West Contra Costa Landfill in Richmond. However, the limited remaining capacity (5 years) would be severely shortened to about two years by this volume increase and this could result in only relocating the short term disposal problem to another wasteshed.

Private Siting Efforts

Under the County's current replacement siting program, as approved by the Board in the November, 1985 Plan Amendment, the private sector had until January 1, 1986 to begin the application process for land used approvals for any new disposal capacity to be utilized prior to July 1988. Three such applications have been filed. These proposed sites, referred to as the Kirker Pass Landfill, the Central Landfill and the East Contra Costa Landfill, are described and mapped on the following pages.

Environmental Impact Reports for each of these projects have been prepared and are scheduled for certification in the near future. This process will culminate in a hearing sometime after October 1, 1986. At this hearing, the County Board of Supervisors schedule for will consider approval of the three landfills, approving, none, all or some combination of these sites. General Plan Amendments, Zoning changes, and Use Permits will be approved at this hearing for the successful sites.

Any one of these new landfills would provide long term (more than 20 years) disposal capacity for the entire County. The life of any of these sites would vary drastically depending on a) which other new facilities were proposed and b) how remaining capacity and proposed expansions at existing landfill sites was utilized.

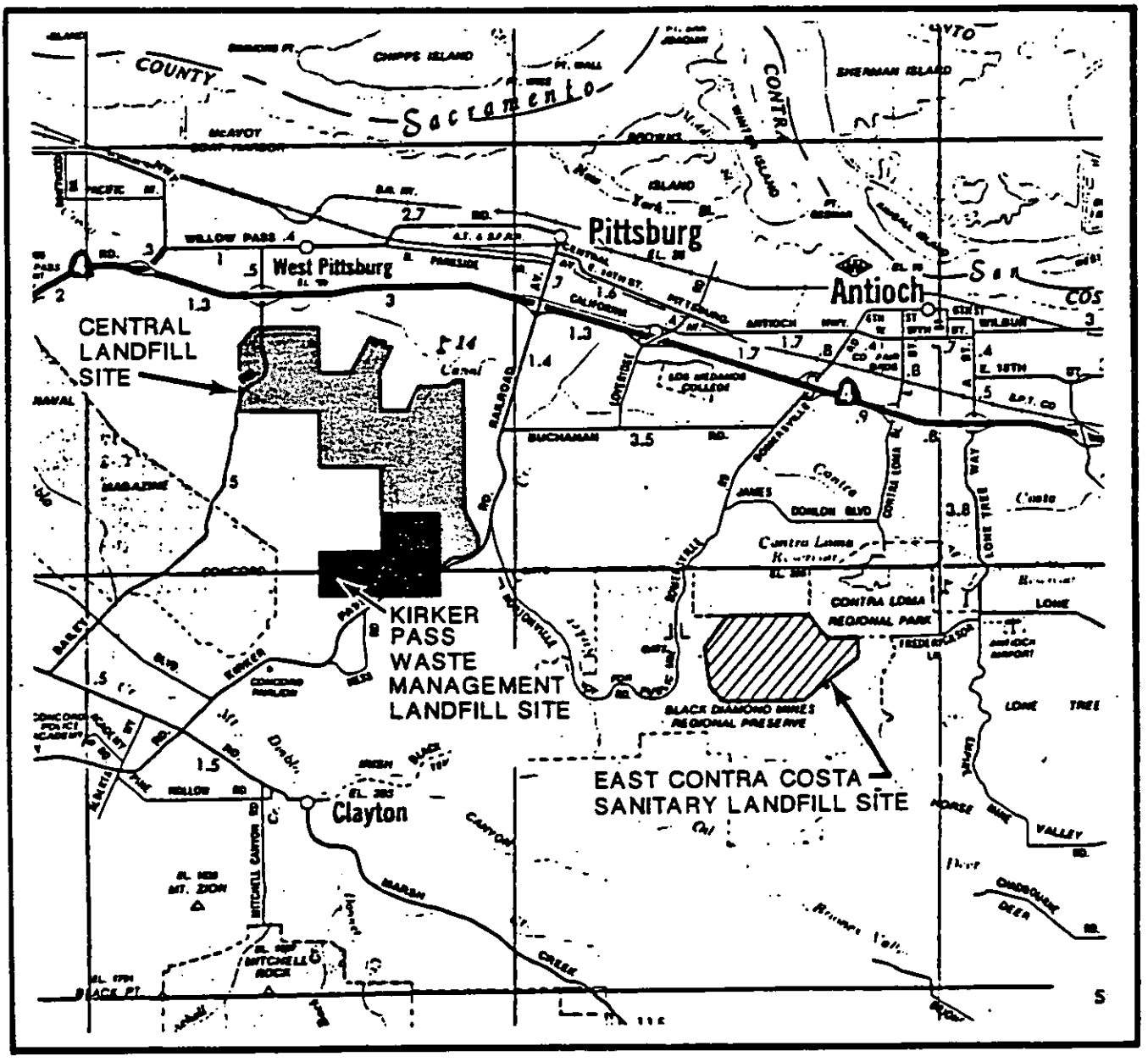
Following County approval of these projects, an Amendment to the County Solid Waste Management Plan for sites given local land use approval will be circulated to the cities of Contra Costa County. It is anticipated that this Amendment could reach the California Waste Management Board by March or April. A more precise schedule for the processing of the Plan Amendment will be submitted by the County with the Plan Revision work program. Once amended into the current Plan, these facilities will also be included in the Plan Revision text.

The following table summarizes the three private sector proposals now before the County:

Name and Proponent:	**Acres:**	**Capacity:** (million cu. yds.)	**Location:**
Kirker Pass Landfill Sid Corrie and Associates (dba Land Waste Management)	480	26	off Kirker Pass Rd. between Concord and Pittsburg
Central Landfill collector and disposal operators group (Garaventa et. al.) Robert Herbert and Jean Elworthy, current land owners	1,740	84	between Bailey Rd. and Kirker Pass Rd. near Pittsburg
East Contra Costa Sanitary Landfill Garaventa family dba S & J Investments	880 w/330 as landfill	42.6	1/2 mi. S. of Antioch adjoining Black Diamond Mines Regional Preserve

Other County Siting Efforts

Two studies of possible public landfill locations, to be considered if the current private locations are not approved, have been completed as a part of the County's new landfill capacity program. The first of these studies was completed by the Central Contra Costa Sanitary District in 1985. Fourteen possible landfill sites were identified by this study in five areas of the County. These were screened to five sites and two candidate areas for further investigation.



PROPOSED PRIVATE SECTOR LANDFILL SITES

0 1 2
SCALE IN MILES

Source: Engineering Science

Following a policy statement by the County Board of Supervisors that the County should only pursue these sites only as a "backup" to the current private landfill proposals, the County Public Works Department hired Brown Vence Associates to continue to pursue one potential site and two potential site areas in the Southeast area of the County. This resulted in the completion of the Southeast County Siting Study in June, 1986. This is a reconnaisance level study intended to serve only a the basis for pursuing a public site further through geologic and environmental investigation if the three private sites are not permitted.

Other Potential Landfill Capacity Source in the County

Two existing landfill sites are proposing possible expansions. The Acme landfill operator are discussing with the Bay Conservation and Development Commission (BCDC) the feasibility of a height increase on the current fill area as a possible source of additional interim landfill capacity. This will be a complex process involving the Amendment of the Bay Area Harbors Plan and approval of the U.S. Army Corps of Engineers as well as local land use and state solid waste permitting.

The West Contra Costa Landfill Operator is also discussing the possibility of an area expansion to extend its current site life. This also would involve BCDC and the U.S. Army Corps of Engineers would raise wetlands fill mitigation mitigation issues.

Neither of these potential expansions should be considered a solution to either the County's interim capacity needs or the long term capacity needs. While they will continue to be pursued, these alternatives will diminish but not supercede the current capacity needs and are not considered to be certain enough to be relied upon for short term landfill needs.

C. **Enforcement Program**

The County Environmental Health Department is the Local Enforcement Agency for Health related standard for solid waste activities throughout the County. Since at least some portion of the all three of the municipal waste sites is within unincorporated County territory, the County Health Department is responsible for all aspects of landfill permitting and enforcement.

The Enforcement program was prepared in 1981 and was incorporated as part of the first Plan Revision. Since that time, eight cities have designated the County as the enforcement agency for non-health as well as health standards.

These designations of the County were approved by the California Waste Management Board for the cities of Concord, El Cerrito, Hercules, Martinez, Pinole, Pittsburg, Pleasant Hill, and Walnut Creek by Resolution 82-86. The County Environmental Health Department is responsible for conducting these non-health duties.

In addition, two additional cities, Danville and San Ramon, have incorporated and indicated their intent to designate the County as Local Enforcement Agency. Following these changes, the Enforcement Plan will reflect only the City of Antioch as maintaining "split" designation and responsible for enforcement of non-health standards. This City currently contains no solid waste facilities.

D. System Improvements

Since the current Plan was revised in 1982, several improvements have been made. Because the landfill sites in the County are privately operated and many of these improvement are landfill related, many of the improvements have been made by the private operators. Some of these changes are described below.

- Sludge Incineration is occuring at the Central Contra Costa Sanitation District treatment site near Concord. This eliminates much of the disposal problem in the Central wasteshed for this hard to handle waste.

- A brush chipping and composting operation at the West Contra Costa (Richmond) Landfill is occurring on a trial basis in an attempt to reduce the volume of this material and possibly reuse this material. Unlike other compost operations, emphasis is on exploring how little effort can achieve a usable product.

- A drop off recycling area, near the gate to the West Contra Costa Landfill, has been added to allow public users to recycle at the landfill. This area is maintained by the landfill operators.

- A new access road has been constructed at the Acme landfill to avoid complaints of residences about landfill traffic and improve the onsite traffic pattern.

- Additional Leachate and Gas monitoring systems have been installed at all three landfill sites to comply with the State Water Quality Control Board's subchapter 15 requirements and other more stringent landfill standards.

- The methane gas recovered at the Acme Landfill by the landfill gas recovery system is now being used by the Central Contra Costa Sanitation District to fuel sludge incineration.

- The gas recovery system at the West Contra Costa Landfill is online. This system uses gas collected to the generate electricity which is sold to Pacific Gas and Electric.

- The sewage ponds at the West Contra Costa Landfill have been eliminated because they resulted in leachate and odor problems and proved ineffective as means of evaporation. Sludge is now required to have lower moisture content before it is accepted.

- At the West Contra Costa Landfill (Richmond), a sub-contractor is shredding tires prior to their disposal to eliminate the potential disposal problem of whole tires. It is hoped that these tires may salable as a fuel source to Louisiana Pacific Corp for use a boiler fuel.

- Actions are in progress to merge the inactive Antioch landfill with the Pittsburg landfill and to formally close the inactive portion of these sites. This is expected to be completed during the upcoming five year review of these permits.

- Three new private disposal sites have been proposed and are currently undergoing the environmental review process as discussed above under "Future Facilities". Two reconaisance level studies of the potential public replacement landfill site locations have been completed by the Central Contra Costa Sanitary District and the County Public Works Department.

E. Current Issues and Problems

The following issues pertaining to the waste management program are currently being considered:

1. Replacement disposal capacity is needed for all three landfill sites, but most urgently for the Acme Landfill.

2. Means to provide disposal capacity for the Acme landfill service area replacement site after the Acme landfill closure and during the site development period for any new landfills. Currently, this "capacity gap" time period is estimated to be between one and two years.

3. Decisionmaking is necessary by the West County Joint Powers Authority on whether to pursue the proposed waste-to-energy project and funding obligations of its members.

4. Development of operation and design standards for inclusion new replacement landfill permits is occurring to provide for stricter compliance with State Minimum Standards than could occur with the location and design of older sites. The County anticipates that this could improve landfill compliance and resolve many of the public concerns with landfill operations through the design of new site replacement capacity.

F. Projects not Implemented

Projects listed in the short-term objectives of the 1982 CoSWMP not implemented are as follows:

1. The two proposed waste-to-energy projects - the Central and West County projects - as described above under "Resource Recovery".

2. The expansion of the Acme Landfill was only partially implemented because of the limited approval given to the project.

3. A used tire recycling study was postponed. Private sector solutions at the Richmond Landfill contributed to this project having a lower priority.

4. Annual recycling conferences were replaced by a single initial conference. Follow up conferences and public information sessions will be held on as-needed basis.

5. As study of additional available sources of landfill cover was material was found unnecessary with the more limited expansion of the Acme site.

6. Gate fees were found too changeable to track on a yearly survey basis as proposed.

II. Report Summary:

The Contra Costa County Plan Review Report has been submitted to the CWMB in compliance with Government Code Section 66780.5(b). California Administrative Code Section 17141 requires the County to address the following areas of the solid waste management program, when deciding whether or not to revise their solid waste management plan:

1. Adequacy of the data base
2. Consistency with state policies
3. Economic changes
4. Implementation schedule
5. Current and future administrative responsibilities
6. Changes in funding sources
7. Future facilities
8. Elements of plan not implemented

A summary of the content of the Plan Report letter submitted by the County (Attachment 2) follows:

1. Database: The Plan s database will be revised to reflect a) Updated population projections which has been prepared by the Association of Bay Area Governments (ABAG), the responsible regional planning agency and b) remaining landfill capacity information which has changed dramatically since 1982 CoSWMP.

2. Consistency with State Policy: The Plan will be revised to reflect the State requirements for designation of new or expanded solid waste facilities in the County General Plan prior to permitting these facilities. This change in the Government Code has occurred since the completion of the 1982 CoSWMP Revision.

3. Economic Changes: The County found not economic changes of significance to the CoSWMP in the County since the last Plan Revision.

4. Implementation Schedule: The County will update the implementation schedule to reflect short term tasks and found not to be necessary.

5. Administrative Responsibilities: The County determined the current CoSWMP description to be accurate and anticipates no changes in future responsibilities.

6. Funding Sources: The County indicates that there are no major changes in funding sources since the 1982 CoSWMP.

7. Future Facilities: The 1982 CoSWMP does not describe the current proposals for replacement landfills nor the County's siting studies of additional potential landfill sites. The three private sector sites being evaluated by the County will be described in the CoSWMP in general terms with the requirement that locally approved sites be included in the CoSWMP by site specific Amendment following local General Plan designation. Such Amendments may occur before submission of the Plan Revision.

   A summary of reconaissance level siting studies for other potential siting studies will also be included. Transfer station siting and feasibility studies since the 1982 CoSWMP will also be included in the revision.

8. Elements of the Plan Not Implemented:

   a. Only a portion of the Acme Landfill expansion proposed in the 1982 CoSWMP was approved.

   b. Progress on the two waste-to-energy plants proposed in the 1982 CoSWMP has not been as prompt as anticipated. The Central County project was found not cost effective; the West County project has had major problems with wastestream commitments and city concurrence in project feasibility. New schedules for evaluation and implementation of these projects are proposed to be included in the Revision.

   The County's submittal letter also includes a summary of the County's current landfill siting process progress.

   Based on the above, the County proposed to revise three parts of the CoSWMP. Chapter 5, Landfill Disposal, Chapter 8, Waste Quantities and Projections, and the Implementation Schedule.

III. Staff Comments:

Staff has also comprehensively reviewed the Contra Costa County Solid Waste Management Plan and the contents of the Plan Review Report to ascertain the consistency of the Contra Costa CoSWMP with State Policy and the Planning Guidelines for preparing, revising and amending County Solid Waste Management Plans.

Staff concurs that those changes proposed by the County in the Plan Review letter and summarized above are necessary. However, staff believes the following additional changes are also appropriate. While many of these additional changes may have been recognized by the County, they are not stated in their Plan Review. Enunciation of these changes is necessary to include them in the Board's requirements for the Plan Revision content.

These changes involve a greater breadth of the Plan text than the County's indicated proposal to revise Chapters 5 and 8 and the Implementation Schedule. Staff does not believe that the additional changes will, for the most part, involve major efforts. Rather they will involve reflecting the County's existing and intended efforts and will provide for a more comprehensive update of the Plan.

Among the additional changes necessary in the update are:

Goals, Objectives and Planning Statements- all elements
Review these policies to determine whether these policies will need to be changed given the changes in the Solid Waste system resulting from the need for new disposal sites and the lessening reliance on waste-to-energy in the short term.

Administrative and Solid Waste Program Financing

Revise the Plan's discussion of administrative financing to reflect planning and enforcement fees assessed on landfill operations and revise references to General Fund financing as relevant.

Revise the administrative responsibilities to reflect the movement of the County Solid Waste Planning function from the Public Works Department to the Community Development Division.

Collection

Update of the Plan's collector list to indicate current collectors.

Enforcement Program

Revision of the Enforcement Program to indicate the designation of the County Health Department as the Local Enforcement Agency (LEA) for the new Cities of Danville and San Ramon and the designation of the County by the Cities, which were formerly designated as the LEA.

Transfer and Storage

Inclusion of programs and policies for the siting of new transfer stations needed to serve present service areas following the siting of the new landfills. Inclusion of possible transfer station locations necessary, during the short term planning period.

Disposal

New landfill disposal capacity currently being sited shall be included in the County Solid Waste Management Plan Revision prior to Revision submittal.

Description of the interim disposal capacity mechanism which will be utilized by the County if Acme Landfill closes as scheduled in June 1987.

Revision of element 27 of the current implementation schedule to delete reference to the California Highway Patrol grants for Abandoned Vehicle abatement and inclusion in the plan text of recent County actions to fund abandoned vehicle abatement programs.

Inclusion of system improvements in the Plan Revision text descriptions. Comprehensive review of the current Plan to update or remove dated material.

Resource Recovery

Include of the results of the County's proposed update of their recycling database and feasibility study from the intended "recycling options" study.

Implementation Schedule

In addition to the County's stated consideration of tasks completed and found unnecessary, review of the CoSWMP implementation schedule indicates the schedule is in need of revision to:

1. Add new programs; both those found necessary in completion of the Plan Revision process and those which are now proposed but not included in the current Plan This should include, but not be limited to, the siting of new landfills to provide replacement capacity.

2. Reassess the Medium and Long Term Tasks and Programs of the Implementation Schedule to; a) reflect the anticipated newly sited landfills and the status of landfills siting efforts still in progress; b) indicate resulting transfer station siting activities and; c) indicate times for reassessment of waste-to-energy feasibility.

3. Include approximate dates for the implementation of these Plan Policies and Programs and the establishment, expansion, and closure of solid waste facilities identified in the Plan, to meet the requirements and definition of Government Code Sections 66780.1 and 66714.9 as amended in 1982. This should include approximate dates for the steps necessary following landfill selection to implement this landfill capacity and allow landfill operation.

AUG 13 1986

Community
Development
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Phone:

Contra
Costa
County

Harvey E. Bragdon
Director of Community Development

ATTACHMENT 3-2

August 11, 1986

R-38E

George T. Eowan, Chief Executive Officer
California Waste Management Board
1020 Ninth St., Suite 300
Sacramento, CA 95814

Dear Mr. Eowan:

This letter is a revised Plan Review Report for the Contra Costa County Solid Waste Management Plan (CSWMP). This report is prepared as required in Section 17141(b) of the California Administrative Code. This report supersedes the Plan Review Report submitted to the California Waste Management Board (CWMB) on November 19, 1985. Discussions with CWMB staff and new information on some solid waste issues have resulted in the need to update the original Plan Review Report. The 1982 revision to the CSWMP was approved by the CWMB on December 16, 1982.

The Administrative Code states that this Report shall address eight specific topics. The following section provides this information. Also included in this Report are descriptions of various parts of the CSWMP that need updating, a description of the existing planning situation in the County, and a notification to the CWMB that amendments for specific solid waste facilities may be processed during the Plan Revision process.

REVIEW OF EXISTING PLAN

Adequacy of Data Base

The existing data base in the 1982 CSWMP will be revised. The waste quantity data in the 1982 CSWMP was based on population projections by the Association of Bay Area Governments (ABAG) and unit waste generation factors. ABAG has provided updated population projections and these have been used to update waste quantity projections. The changes are not significant, but the revised population projections will be included in the Plan Review. Information on the capacity of existing landfills has changed dramatically from the capacity as shown in the 1982 CSWMP. This information will be updated.

Consistency with State Policies

State policies have not significantly changed since the approval of the 1982 CSWMP. The only exception to this is recent legislation requiring the city or county General Plans to be consistent with the CSWMP before solid waste facilities can be approved. The effect of these changes in law to Contra Costa County will be described in the Plan Revision. No other revisions to this portion of the CSWMP appear to be necessary.

Economic Changes

There have been no major economic changes in Contra Costa County, nor in solid waste handling practices. We do not feel that any changes to the CSWMP due to economic changes are necessary.

Implementation Schedule

The implementation schedule in the 1982 CSWMP is in need of updating. Many of the short-term tasks have been completed and some of the tasks that were not completed were found to be not necessary. This section is in need of updating.

Current and Future Administrative Responsibilities

There is no anticipated change in administrative responsibilities for solid waste management in Contra Costa County. The administrative structure identified in the 1982 CSWMP remains accurate.

Changes in Funding Sources

Solid waste planning and enforcement activities are currently funded by an assessment to landfill operators pursuant to the Government Code. Funding for solid waste facilities are by the private sector. There are no major changes to the 1982 CSWMP concerning funding sources.

Future Facilities

The 1982 CSWMP does not describe any future landfill or transfer station facilities. Since the 1982 CSWMP, three potential landfill sites have been proposed by the private sector. Several other potential landfill sites have been identified in reconnaissance level siting studies. The need for transfer stations has also been studied and quantified in more detail since the 1982 CSWMP. The update to the 1982 CSWMP will include general descriptions of identified potential facilities that have not gone through the approval process. These descriptions will be general in nature and would require amendments for formal inclusion into the CSWMP. Those facilities that have been formally proposed will require separate amendments to the CSWMP. These amendments may be processed before or simultaneously with the CSWMP Revision.

Elements of the Plan that were Not Implemented or Successfully Accomplished

The major change in the 1982 CSWMP was the major reduction in the capacity of Acme Landfill. This was the result of an unfavorable permit determination for an expansion to the landfill. This accelerated the need to identify new landfill sites. Progress on the two waste to energy projects identified in the 1982 Plan has not been as prompt as expected. The Central County waste to energy project was not implemented because of reservations concerning the cost-effectiveness of the project. The West County Agency waste to energy project is continuing to

move toward project implementation but has had major problems securing an adequate wastestream and obtaining local concurrence that the project is feasible. An update to the 1982 CSWMP would include a new landfill siting schedule and an update on the status of the two waste to energy projects.

SECTIONS OF 1982 CSWMP IN NEED OF UPDATING

Implementation Schedule

As stated above, many of the tasks in the implementation schedule have been completed and many of the others that have not been completed have been found to be unnecessary. A revised implementation schedule will be included in Plan Revision.

Chapter 5 - Landfill Disposal

The capacities of all three landfills in Contra Costa County (Acme Fill, West Contra Costa Sanitary Landfill, and Contra Costa Waste Sanitary Fill) need to be updated. As stated previously, the capacity at Acme Landfill has been reduced to June 1987 due to an adverse ruling on an expansion request from the Corps of Engineers.

The assumption used in developing the capacity for the West Contra Costa Sanitary Landfill in the 1982 CSWMP were not accurate. New assumptions, based on a new closure plan and a significant increase in the amount of waste the landfill received, has reduced the capacity to approximately 1992.

Additional information on the capacity of the Contra Costa Waste Sanitary Landfill is now available, but because this landfill is much smaller than the other two, the effect on the total system is minimal. The Plan Revision will include updates of the capacity of the three existing landfills in the County.

The Plan Revision will also include the recent major efforts to site new landfills in Contra Costa County. The County Community Development Department has accepted three applications for new sanitary landfills sponsored by private interests. Environmental Impact Reports for all three landfills are currently underway. Additionally, the Central Contra Costa Sanitary District, in cooperation with the County, performed a landfill siting study which identified numerous potential landfill sites in addition to the three privately-proposed sites. As a follow up to the Central Contra Costa Sanitary District/County Study, the County has completed a further study in the Southeast portion of the County to identify additional landfill sites as a back-up to the three privately-proposed sites. The private sector has also identified another potential site (known as the Bettencourt site) in the Southeast County area. The status of these proposed landfills will be included in the Plan Revision. We anticipate that each of the landfills, as they are proposed for implementation, will be amended into the CSWMP at an appropriate time or be included in the revision.

Amendment No. 1 to the 1982 CSWMP has been approved by the California Waste Management Board. This Amendment is a time schedule for seeking a new sanitary landfill for the County and calling for a plan to dispose of waste if existing landfills should close before a new landfill is in operation. This short-term "contingency" plan would involve seeking an extension in height at the Acme Landfill, sending waste from Central County to the other two existing landfills, and export to adjacent counties. The details of this short-term plan are currently being negotiated. This short-term plan could be an amendment to the 1982 CSWMP or included in a revision to the CSWMP.

Chapter 8 - Current Quantities and Future Projections

As stated previously, the basic data concerning solid waste projections have not changed significantly. Staff has updated the waste quantity projections with some recent new population projections by ABAG. The major modifications necessary in this chapter are the projections of future landfill lives. As mentioned previously, the lives of County landfills have been reduced significantly. The Plan Revision will show these changes including scenarios where no waste are exported out of the County and scenarios where waste is exported out of the County. This is expected to be part of the short-term plan pending the opening of a new landfill within the County.

EXISTING PLANNING SITUATION

The 1982 CSWMP anticipated Acme Landfill to have capacity until at least 1993. The current permitted capacity at Acme is only to June 1987. In response to the need for a new landfill for the Central County (and later, the entire County), private interests have proposed three sanitary landfill projects. Environmental Impact Reports for all three landfills are currently being done. This effort is consistent with the 1982 CSWMP and Amendment No. 1 (Landfill Siting Schedule) to the 1982 CSWMP. In this respect, efforts for seeking a new landfill for Contra Costa County are consistent with the 1982 CSWMP. As mentioned previously, there has also been independent efforts by the Central Contra Costa Sanitary District and the County in identifying other potential landfill sites and back-up landfill sites.

With any of the proposed landfill sites, transfer stations are likely to be needed. A significant amount of research into the necessity for transfer stations has been completed. Policy level decisions concerning siting and a time-line for development of transfer stations are currently underway.

It is evident that there is much activity in Contra Costa County concerning planning of solid waste facilities. All this planning is being done under the auspices of the 1982 CSWMP and Amendment No. 1 to that CSWMP. The County Community Development Department, which administers the CSWMP on behalf of the Board of Supervisors, is working closely with the project proponents in order to insure consistency with the CSWMP and advising them of procedures for amendment for inclusion into the CSWMP.

PROCESS

As mentioned previously, the County is currently processing three applications for sanitary landfills. Each landfill will require an amendment to the CSWMP. CWMB staff has informed us that it is possible to process amendments to the CSWMP while a revision is being done. In order to process the landfill applications as quickly as possible, it is not feasible to include the three landfill proposals in the Plan Revision. Since the process for an amendment is faster than that for a revision, and the scope is much less, the County proposes to process a single amendment for the landfill sites that will be approved by the County. We now anticipate that the Board of Supervisors will take action on the CSWMP amendment for the proposed landfill cities in October or November of this year. The CSWMP revision will only be starting at that time. If the CWMB has any reservations about acting on a CSWMP amendment while a revision is underway, the County should be immediately notified so that an alternative process can be developed.

We look forward to your response to this Plan Review Report. We look forward to working with the CWMB and your staff in updating the 1982 Contra Costa County Solid Waste Management Plan.

If you have any questions, please contact Dave Okita at 415/372-2071.

Very truly yours,

HARVEY E. BRAGDON
Director of Community Development

Paul E. Kilkenny

By: Paul E. Kilkenny
Assistant Director

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cc: Board of Supervisors
Solid Waste Commission

NOV 20 1985

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Director of Community Development

ATTACHMENT3-3

November 19, 1985

R-38E

George T. Eowan, Chief Executive Officer
California Waste Management Board
1020 Ninth Street, Suite 300
Sacramento, CA 95814

Dear Mr. Eowan:

This letter is the Plan Review Report for the Contra Costa County Solid Waste Management Plan (SWMP). This report is prepared as required in Section 17141 (b) of the California Administrative Code. The 1982 Revision to the CSWMP was approved by the California Waste Management Board on December 16, 1982. This report is being prepared prior to the third anniversary date of approval of the Plan, as specified in the regulations.

The Administrative Code states that this report shall address eight specific topics. The following section provides this information. Also included in this report are descriptions of various parts of the CSWMP that need updating, a description of the existing planning situation in the County, and a discussion as to whether updating of the CSWMP can be done by amendment or revision.

REVIEW OF EXISTING PLAN

Adequacy of Data Base

The existing data base in the 1982 CSWMP remains adequate. The waste quantity data was based on population projections by the Association of Bay Area Governments (ABAG) and unit waste generation factors. Population projections have been updated by ABAG but the change is not significant. The waste generation factors have proven to be accurate for planning purposes and no modifications are necessary. We therefore conclude that the data base for waste quantities does not need to be modified. Information on the capacity of existing landfills has changed dramatically from the capacity as shown in the 1982 CSWMP. This information needs to be updated.

Consistency with State Policies

State policies have not changed since the approval of the 1982 CSWMP. Therefore,

we conclude that since the 1982 CSWMP was found to be consistent with State policies, no revisions to this portion of the CSWMP would be necessary.

Economic Changes

There have been no major economic changes in Contra Costa County, nor in solid waste handling practices. We do not feel that any changes to the CSWMP due to economic changes are necessary.

Implementation Schedule

The implementation schedule in the 1982 CSWMP is in need of updating. Many of the short-term tasks have been completed and some of the tasks that were not completed were found to be not necessary. This section is in need of updating.

Current and Future Administrative Responsibilities

There is no anticipated change in administrative responsibilities for solid waste management in Contra Costa County. The administrative structure identified in the 1982 CSWMP remains accurate.

Changes in Funding Sources

Solid waste planning and enforcement activities are currently funded by an assessment to landfill operators pursuant to the Government Code. Funding for solid waste facilities are by the private sector. There are no major changes to the 1982 CSWMP concerning funding sources.

Future Facilities

The 1982 CSWMP does not describe any future landfill and transfer station facilities. Since the 1982 CSWMP several potential landfill sites have been identified and the need for transfer stations has been somewhat quantified. An update to the 1982 CSWMP should include general descriptions of these future facilities, but separate amendments for each facility would be required for formal inclusion into the CSWMP.

Elements of the Plan that were Not Implemented or Successfully Accomplished

The major change in the 1982 CSWMP was the major reduction in the capacity of Acme Landfill. This was the result of an unfavorable permit determination for an expansion to the landfill. This accelerated the need to identify new landfill sites. Progress on the two waste-to-energy projects identified in the 1982 Plan has not been as prompt as expected. The Central County waste-to-energy project was not implemented because of reservations concerning the cost-effectiveness of

the project. The West County Agency waste-to-energy project is continuing to move toward project implementation but has had major problems securing an adequate wastestream and obtaining local concurrence that the project is feasible. An update to the 1982 CSWMP would include a new landfill siting schedule and an update on the status of the two waste-to-energy projects.

SECTIONS OF 1982 CSWMP IN NEED OF UPDATING

Implementation Schedule

As stated above, many of the tasks in the implementation schedule have been completed and many of the others that have not been completed have been found to be unnecessary. A revised implementation schedule should be included in any modifications to the 1982 CSWMP.

Chapter 5 - Landfill Disposal

The capacities of all three landfills in Contra Costa County (Acme Fill, West Contra Costa Sanitary Landfill, and Contra Costa Waste Sanitary Fill) need to be updated. As stated previously, the capacity at Acme Landfill has been reduced to June 1987 due to an adverse ruling on an expansion request from the Corps of Engineers.

The assumption used in developing the capacity for the West Contra Costa Sanitary Landfill in the 1982 CSWMP were not accurate. New assumptions, based on a new closure plan and a significant increase in the amount of waste the landfill received, has reduced the capacity to approximately 1992.

Additional information on the capacity of the Contra Costa Waste Sanitary Landfill is now available, but because this landfill is much smaller than the other two, the effect on the total system is minimal. Any modification to the 1982 CSWMP should include updates of the capacity of the three existing landfills in the County.

Any update should also include the recent major efforts to site new landfills in Contra Costa County. The County Community Development Department has accepted three applications for new sanitary landfills sponsored by private interests. Environmental Impact Reports for all three landfills are currently underway. Additionally, the Central Contra Costa Sanitary District, in cooperation with the County, performed a landfill siting study which identified numerous potential landfill sites in addition to the three privately-proposed sites. As a follow up to the Central Contra Costa Sanitary District/County Study, the County has commissioned a further study in the Southeast portion of the County to identify additional landfill sites as a back-up to the three privately-proposed sites. The private sector has also identified another potential site (known as the

has been completed. Policy level decisions concerning siting and a time-line for development of transfer stations are currently underway.

It is evident that there is much activity in Contra Costa County concerning planning of solid waste facilities. All this planning is being done under the auspices of the 1982 CSWMP and Amendment No. 1 to that CSWMP. The County Community Development Department, which administers the Plan on behalf of the Board of Supervisors, is working closely with the project proponents in order to insure consistency with the CSWMP and advising them of procedures for amendment for inclusion into the CSWMP.

AMENDMENT OR REVISION?

It is clear that some updating needs to occur to the 1982 CSWMP. We do not feel that a full revision to the 1982 CSWMP is feasible at this time. One or more new major sanitary landfills are expected to be in operation within the next few years. There are three applications for landfills currently being processed and we do not know whether any or all will receive all the necessary approvals and be in operation. Therefore, we cannot plan a system of landfills and transfer stations in a full revision of the 1982 CSWMP at this time. If a revision is required, we would only be able to identify locations of proposed landfill facilities without showing expected closure dates for the landfills or areas of the County contributing wastes to the landfills. We feel there are basically two methods to conduct this update: A series of amendments and a "focused" revision.

The 1982 CSWMP can be updated through a series of amendments. The next amendment would be a short-term plan ("contingency" plan) which would show how waste will be disposed of after Acme Fill closes in June 1987 and until a new landfill is in operation. Subsequent amendments would be for landfills and transfer stations as they are proposed. After the major landfills and transfer stations are identified through amendments, a complete full revision of the CSWMP could be done.

Another alternative is to do a "focused" revision to the CSWMP. Only certain sections of the Plan would be revised, in this particular case, the Implementation Schedule, Chapter 5 - Landfill Disposal, and Chapter 8 - Current Quantities and Future Projections. Separate amendments would be necessary for major facilities such as landfills and transfer stations.

The County prefers to update the 1982 CSWMP by the first method described, by a series of amendments. The reasons for this preference are as follows:

1. This will allow for an orderly procession to a future major revision to the SWMP.

2. The revision process involves a long time period (nine months) during which landfills and transfer stations would be requesting amendments to the CSWMP. The County has recently received one request for an amendment for a landfill. Undergoing a Plan revision while processing Plan amendments concurrently, would be confusing and not practical planning.

3. If a Plan revision is done now, another revision after major facilities have been amended to the Plan would be necessary.

4. Since current planning efforts are consistent with the 1982 CSWMP and Amendment No. 1 to the CSWMP, we do not feel a strong need to revise the Plan at this time. There is a high level of activity leading to implementation of solid waste facilities in Contra Costa County and these efforts are consistent with the 1982 CSWMP and are being monitored by County staff.

5. We have concurrence from the Board of Supervisors and the County Solid Waste Commission that an amendment process is preferred over a revision at this time. The Solid Waste Commission represents all cities and sanitary districts in the County.

We look forward to your response to this Plan Review Report. We hope you will agree with us that the update to the 1982 CSWMP can be done by a series of amendments, rather than a revision at this time. We feel that an amendment for a short-term plan, that can be immediately started, will update the CSWMP as well as a revision.

If you have any questions, please contact Dave Okita at 415/372-2071.

Very truly yours,

Anthony A. Dehaesus
Director of Community Development

Paul E. Kilkenny

By: Paul E. Kilkenny
Assistant Director
Community Development Department

DBOcl
sw.l.swmb.plan.rev.rpt.tll

cc: Board of Supervisors
Solid Waste Commission
County Administrator
County Counsel
Environmental Health

Bettencourt site) in the Southeast County area. The status of these proposed landfills should be included in any update to the 1982 CSWMP. We anticipate that each of the landfills, as they are proposed for implementation, should be amended into the CSWMP at an appropriate time.

Amendment No. 1 to the 1982 CSWMP has been approved by the California Waste Management Board. This Amendment is a time schedule for seeking a new sanitary landfill for the County and calling for a plan to dispose of waste if existing landfills should close before a new landfill is in operation. This short-term "contingency" plan would involve seeking an extension in height at the Acme Landfill, sending waste from Central County to the other two existing landfills, and export to adjacent counties. The details of this short-term plan are currently being negotiated. This short-term plan could be an amendment to the 1982 CSWMP or included in a revision to the CSWMP.

Chapter 8 - Current Quantities and Future Projections

As stated previously, the basic data concerning solid waste projections have not changed significantly. Staff has updated the waste quantity projections with some recent new population projections by ABAG. The waste quantities have not significantly changed. The major modifications necessary in this chapter are the projections of future landfill lives. As mentioned previously, the lives of county landfills have been reduced significantly. Any modification to the Plan should show these changes including scenarios where no waste are exported out of the County and scenarios where waste is exported out of the County. This is expected to be part of the short-term plan pending the opening of a new landfill within the County.

EXISTING PLANNING SITUATION

The 1982 CSWMP anticipated Acme Landfill to have capacity until at least 1993. The current permitted capacity at Acme is only to June 1987. In response to the need for a new landfill for the Central County (and later, the entire County) private interests have proposed three sanitary landfill projects. Environmental Impact Reports for all three landfills are currently being done. This effort is consistent with the 1982 CSWMP and Amendment No. 1 (Landfill Siting Schedule) to the 1982 CSWMP. In this respect, efforts for seeking a new landfill for Contra Costa County are consistent with the 1982 CSWMP. As mentioned previously, there has also been independent efforts by the Central Contra Costa Sanitary District and the County in identifying other potential landfill sites and back-up landfill sites.

With any of the proposed landfill sites, transfer stations are likely to be needed. A significant amount of research into the necessity for transfer stations

CALIFORNIA WASTE MANAGEMENT BOARD
RESOLUTION 86-62
September 22-23, 1986

Resolution of Acceptance of the Contra Costa County Solid Waste Management Plan Review Report.

WHEREAS, the Board finds that it has approved the revised Contra Costa County Solid Waste Management Plan on December 15, 1982 as meeting the requirements of the Nejedly-Z'Berg-Dills Solid Waste Management and Resource Recovery Act of 1972; and

WHEREAS, the Board finds that the County of Contra Costa has reviewed its County Solid Waste Management Plan and submitted a report to the Board pursuant to Government Code Section 66780.5(b); and

WHEREAS, the Board finds that the County of Contra Costa has determined that to be consistent with State Policy, the County Solid Waste Management Plan is in need of revision; and

WHEREAS, the Board finds that its staff has prepared a Staff Review and Comment which analyzes the effectiveness of the Contra Costa County Solid Waste Management Plan, in light of the Plan Review Report, in providing for current and future solid waste management needs in the County; and

WHEREAS, the Board finds that its staff has determined that revision to the Contra Costa County Solid Waste Management Plan is needed in the following areas:

1) Identification of Solid Wastes (CAC, Section 17131)
2) Storage and Collection of Solid Waste (CAC, Section 17132 and 17133)
3) Disposal/Processing of Wastes (CAC, Section 17134)
4) Resource Recovery (CAC, Section 17135)
5) Plan Administration (CAC, Section 17136)
6) Economic Feasibility (CAC, Section 17137 and Government Code 66780.1))
7) Enforcement Program (CAC, Section 17138 and Government Code 66780.5)
8) Implementation Schedule (CAC, Section 17139 and Government Code Section 66714.9)

WHEREAS, the Board finds that it has directed a copy of said staff Review and Comment be sent to the Contra Costa County Board of Supervisors for their information.

NOW THEREFORE, BE IT RESOLVED that the California Waste Management Board accepts the Contra Costa County Solid Waste Management Plan Review Report; and

BE IT FURTHER RESOLVED that the California Waste Management Board requires Contra Costa County to revise the Contra Costa County Solid Waste Management Plan in those areas indicated above to bring the Plan into full compliance with State Policy; and

BE IT FURTHER RESOLVED that the California Waste Management Board require Contra Costa County to submit a work program timetable for revision as require by Section 17141 of Title 14 of the Administrative Code within the next 30 days;

BE IT FURTHER RESOLVED that the California Waste Management Board requires that the County include, as an attachment to the stated work program, a schedule for Amendments to the current County Solid Waste Management Plan, prior to the completion of said Plan Revision, for the purposes of including: 1. interim disposal capacity plans and 2. proposed replacement landfill sites.

CERTIFICATION

The undersigned Chief Executive Officer of the California Waste Management Board does hereby certify that the foregoing is a full, true, and correct copy of a resolution duly and regularly adopted at a meeting of the California Waste Management Board held on September 22-23, 1986.

Dated

George T. Eowan
Chief Executive Officer

Richmond ~~waste~~ transfer ~100 TPD as of 4/2/87 -

CALIFORNIA WASTE MANAGEMENT BOARD

AGENDA ITEM #8

Albert Bianchi
Ed Stewart

urgency of public need

MARCH 26 - 27, 1987

Item:

Consideration of Determination of Conformance to the Marin County Solid Waste Management Plan and Concurrence with Solid Waste Facilities Permit for Marin Sanitary Services, Inc. Transfer Station, Marin County.

Key Issues:

1. The facility has expanded with the addition of a resource recovery plant to remove newsprint, cardboard, woodwaste, metals, plastics and glass from the wastestream.

2. Facility would expand from 600 tons per day to a permitted capacity of 1,000 tons per day.

3. Present Board policy does not allow concurrence in a Solid Waste Facilities Permit for a new or expanded facility when the CoSWMP is delinquent.

Facility Facts:

Name:	Marin Sanitary Services, Inc. Transfer Station
Project:	Expansion of large volume transfer station to include a 126,295 square foot resource recovery plant
Location:	San Rafael
Service Area:	Marin County
Operator:	Marin Sanitary Services, Inc.
Owner:	Marin Sanitary Services, Inc.
New Permitted Tonnage:	1,000 tons per day
Current Tonnage:	600 tons per day
Acreage:	10.84 acres
Date Permit Received:	February 17, 1987

Background

The original Marin Sanitary Services Transfer Station has served the refuse collection trucks operated by Marin Sanitary Services since it was built and permitted in 1980. In 1985, it was decided to expand the capability of the transfer station complex to accommodate the general public and the collection trucks operated by other waste management companies serving Marin County. The resource recovery facility was constructed in 1986 and included the capability to segregate recovered materials and process them by shredding or baling to meet the buyers' purchase specifications. The total site, which includes the original transfer station and the resource recovery facility, encompasses 10.84 acres.

The original operation was comprised of the enclosed transfer station, an enclosed building for the receipt and handling of recycled materials collected from the curbside recycling program and maintenance facilities for the operator's fleet. The expansion, described below, has been deemed a "significant change" in the facilities design and operation by the LEA. For this reason, the expansion has been reviewed pursuant to CEQA. Consequently, a Finding of Conformance with the County Solid Waste Management Plan is required, and a revised solid waste facilities permit is also required.

Expansion

The new resource recovery building encloses nearly three acres of floor space (126,295 sq. ft.). It includes a large area where seventeen private vehicles can be unloaded simultaneously, as well as other large areas where truckloads of special wastes can be unloaded. The wastes are segregated and moved to the appropriate areas for sorting and processing.

Resource Recovery

Incoming wastes from the general public, as well as commercially-collected debris boxes with wood, corrugated, or other recoverable materials are routed to the new resource recovery facility, where they are unloaded into a shallow 3 foot deep pit. There the wastes are moved to the appropriate sorting and processing area by a wheeled loader. The sorting process includes a series of conveyor belts which carry the waste products past a group of people who manually remove the recoverable materials, placing them onto other conveyors or into bins. The segregated materials are shredded or baled to meet the buyer's specifications and loaded onto a truck or trailer for transport to buyer. The unrecoverable wastes, estimated to be approximately 400 tons per day, are conveyed by belt directly to the transfer station where they are loaded onto the transfer trailer by the dozer for transport to the Redwood Disposal site.

Increase in Wastestream

The facility is designed to process in excess of 2,600 tons per day, seven days a week. The wastestream is currently 600 tons per day.

Permit Revision

The facilities permit is being revised to allow the expansion of the original transfer station to include a new resource recovery operation on the 10.84 acre site. The revised facilities permit specifies a permitted capacity of 1,000 tons per day of waste.

The existing General Plan designates the site as business and industrial review area.

Board Action

Because a revised Solid Waste Facilities Permit is being proposed for the expansion of the transfer station and for the increase in daily tonnage, the Board must review this permit proposal from the standpoint of conformance with the Marin County Solid Waste Management Plan (CoSWMP) and must either object to, or concur with, the proposed Solid Waste Facilities Permit as submitted by the Local Enforcement Agency within 40 days from the date the permit is received at the California Waste Management Board. The proposed permit for the facility was received at the Board on February 17, 1987. Pursuant to Government Code Section 66796.32(e), the Board has until March 29, 1987 to either concur in or object to the issuance of this permit. For this reason, the permit is scheduled for consideration at today's meeting.

California Environmental Quality Act (CEQA):

CEQA requires that the environmental impacts of any project be considered by any public agency with discretionary authority over the project. Both the Determination of Conformance and concurrence with the Solid Waste Facilities Permit are discretionary acts by the Board and require CEQA documentation.

The City of San Rafael prepared and processed a Negative Declaration in compliance with CEQA on November 26, 1985 (see Attachment #3). Staff has carefully reviewed the Negative Declaration and has determined it is an appropriate and adequate environmental document for this project.

Requirements for Determination of Conformance:

CoSWMP History

On June 23, 1983 the Board accepted the Marin County Plan Review Report and directed the County to revise the CoSWMP. The CoSWMP Revision was due on March 23, 1984. Marin County did not submit the CoSWMP Revision by the required date.

At the Board's February 7-8, 1985 meeting, the Board established the following policy concerning delinquent CoSWMPs:

1. That no further time extensions would be granted for CoSWMP Revisions.

2. CoSWMPs would be considered delinquent once the 270 day time limit for preparation of the CoSWMP Revision had been exceeded.

3. That counties with delinquent CoSWMPs would be referred to the Attorney General for enforcement action.

4. No new or expanded solid waste facilities could be found in conformance while CoSWMPs were delinquent.

Marin was one of the counties with a delinquent CoSWMP that was referred to the Attorney General for enforcement action in February 1985.

Marin County subsequently submitted a revised CoSWMP to the Board on September 25, 1986. The Board considered the CoSWMP Revision at their November 7, 1986 meeting, and disapproved the Plan Revision because of its inadequacy in a number of areas. The Board gave Marin County six months to complete the Plan Revision.

Project Conformance

In accordance with Board procedures for obtaining a Determination of Conformance, Marin Sanitary Services, the project proponent, submitted a Notice of Proposed Facility to this Board on February 12, 1987 (Attachment #1)

Also in accordance with Board procedures, the Marin County Planning Department, the agency designated by the Board of Supervisors as the CoSWMP Liaison, made a local finding of conformance with the Marin CoSWMP for the proposed project. That finding was made based on the detailed descriptions of the project in the <u>original</u> <u>CoSWMP</u>.

Since the procedures for obtaining a Determination of Conformance have been completed at the local level, it is now appropriate for this Board to consider the Determination of Conformance for this project.

The Board's Determination of Conformance is based on consideration of four criteria:

1. <u>Consistency with State Policy</u>

   The expansion of the transfer station is consistent with the Board's State Policy in that it provides for an environmentally safe and efficient solid waste facility and it diverts material from landfills.

2. Consistency with the Policies and Objectives of the County Solid Waste Management Plan (CoSWMP)

   Since the CoSWMP is delinquent, the project does not meet this criteria.

3. Consistency with the Short, Medium and Long Term Facilities Element of the County Solid Waste Management Plan

   Since the CoSWMP is delinquent, the project does not meet the criteria.

4. Local Issues and Planning

   The facility is designated in the City of San Rafael General Plan. All local approvals have been obtained for this project.

Conclusion

Because the CoSWMP is delinquent, the project does not meet the second and third criteria for conformance. These criteria are most important as they relate directly to the CoSWMP, the document with which the project must be found in conformance.

Requirements for Concurrence with the Solid Waste Facilities Permit

1. The operator has submitted an application and Report of Station Information to the County of Marin, Environmental Health Services Department.

2. The proposed Solid Waste Facilities Permit is consistent with the State Minimum Standards for Solid Waste Handling and Disposal.

3. The facility is consistent with the City of San Rafael General Plan.

4. The County must have an approved Solid Waste Management Plan. Marin County does not have an approved Plan.

5. A facility must be consistent with the County Solid Waste Management Plan. This facility is not consistent with the Marin County Solid Waste Management Plan.

Board Options:

1. Take No Action

   By taking no action, the Board would relinquish its authority to review and judge the appropriateness of a Solid Waste Facilities Permit. If the Board does not act on a permit within 40 days of receipt, the permit is deemed to have been concurred with.

2. Deny Conformance and Object to Issuance of the Permit

   This action would be appropriate if the project was not identified in the CoSWMP and the proponent had not met all the local and State requirements for these two actions.

3. Find Conformance and Concur in Issuance of the Facilities Permit

   This would be appropriate if the project was identified in the CoSWMP and the proponent had met all State and local requirements for these two actions.

Recommendation:

Staff recommends Option #2 and recommends the Board adopt Determination of Conformance #87-05 denying Conformance with the Marin County Solid Waste Management Plan and Solid Waste Facilities Permit Decision #87-14, objecting to the issuance of permit #21-AA-005.

Attachments

1. Notice of Proposed Facility
2. Local Conformance Finding
3. Notice of Determination
4. General Plan Finding
5. Proposed Facilities Permit #21-AA-005
6. Determination of Conformance #87-05 and Solid Waste Facilities Permit Decision #87-14

ATTACHMENT #1

Marin Sanitary Service
GARBAGE & RUBBISH COLLECTORS
1050 ANDERSEN DR. • P.O. BOX 2248 • SAN RAFAEL, CALIF. 94912 • 456-2601

February 12, 1987

Mr. Cy Armstrong
State Solid Waste
Management Board
1020 Ninth St.
Sacramento, CA 94814

Dear Mr. Armstrong;

I would like to send to you this notice of intent that my opinion Marin Sanitary Service would like to expand its present transfer station to include a full scale waste reduction program in a separate but connected building.

This new building is three acres under one roof (130,000 sq. ft.) and it will take all of the trash that formerly went into the San Quentin Disposal Site which is now closed. The difference in the two sites is that minimally 50% of the waste that went into San Quentin Disposal will be recycled and hopefully as much as 75%.

The building has approximately one half mile of belts with which we will pick off wood, paper products, metals and bottles and cans. In addition, we will have a 400 h. p. Jeffries grinder that will grind up all of the wood and brush in the County.

This new building is connected by a 200 ft. belt that will feed the rubble and waste into our old transfer station that the State Board approved in 1980-1987.

We will employ approximately 15 people in this new facility and we would like you and members of your staff and State Board to visit this new facility.

Very truly yours,

Joseph J. Garbarino
President, Marin Sanitary Service

JJG/so

ATTACHMENT #2

Marin County
Planning Department

Civic Center-San Rafael, California 94903 Telephone 499-6269 Mark J. Riesenfeld, AICP, Director

RECEIVED
FEB 2

February 25, 1987

Mr. Cy Armstrong
California Waste Management Board
1020 Ninth Street, Suite 300
Sacramento, CA 95814

RE: Marin Sanitary Service - Transfer/Recycling Facility

Dear Cy,

You have verbally asked for my opinion regarding the conformance of the Marin Sanitary Service transfer/recycling facility with the Marin County Solid Waste Plan. The following are quotes from the Plan:

Page 10-25: "There will ultimately be three "disposal points" in the County: San Rafael or vicinity Transfer Station, a West Marin Landfill or Transfer Station in the vicinity of Point Reyes Station, and the Redwood Landfill."

Page 10-26: "San Rafael Transfer Station will serve the mid-County areas from San Rafael west to Fairfax and south to Larkspur. Collectors serving areas south of Larkspur will have the option of using the station or direct haul to the West Contra Costa Landfill for a limited time (see below)."

"The San Quentin Disposal Site will continue to serve the eastern portion of the County from north of San Rafael to Sausalito and Tiburon. When filled to capacity, such waste will be taken to the San Rafael Transfer Station, subject to the rules established for acceptance of wastes thereat."

Page 10-27: "Location. It is assumed that transfer stations will be provided in or near Point Reyes Station to replace the West Marin Landfill as a disposal point when it is closed, and in San Rafael. Specitic location, however, is at the discretion of private industry.

Schedule goal. It is a goal of the Plan to implement the West Marin transfer operation prior to and in time for closure of the West Marin Landfill, and the San Rafael Transfer Station in the short-term planning period (by 1980). Actual start-up time, however, is at the discretion of private industry."

Page 11-9: "Q: Why does the Plan call for transfer station located in San Rafael and not elsewhere? A: San Rafael is the population center of the County. A transfer station located near the intersection of . . . . . "

Page 11-10: "Q: How will the San Quentin Disposal Site be affected? A: The San Quentin Site will continue to operate until filled (probably about 1984). After its closure, waste will be taken to Redwood or the San Rafael Transfer Station."

Subsequent to the adoption of the Plan in 1977, Marin Sanitary Service secured a Facility Permit from Marin County Environmental Health Service and commenced operation of a recycling center.

The current expansion and improvements to that facility appear fully consistent with the adopted Plan. The project is being developed by private industry. The project is predicated upon the closure of the San Quentin Landfill. The project is located in San Rafael. The project has received all locally required environmental and project merit approvals.

It is therefore my opinion that no further or additional Facility Permits are required from Marin County.

Should you have any questions, please call.

Very truly yours,

H. Eric Borgwardt
Principal Planner

HEB/bt/ric

cc: Ed Stewart, Environmnetal Health Services
Tom Hendricks, Deputy County Counsel
Joe Garbarino, Marin Sanitary Service
Al Bianchi, Esquire

ATTACHMENT # 3

CITY OF SAN RAFAEL

ENVIRONMENTAL ASSESSMENT AND NOTIFICATION

For the following project, this form serves as a:

- [ ] Notice of Exemption
- [ ] Negative Declaration
- [ ] Notice of Completion
- [x] Notice of Determination

DESCRIPTION

Project Name: Marin Resource Recovery Plant

Address/Location: 1050 Anderson

Land Owner: Marin Sanitary Service

Authorized Representative: Robert Eklund

City File No. ED85-96 Assessor's Parcel No. 15-180-36

Description of Project: Design review for the construction of a recycling facility

ASSESSMENT

Based upon a thorough review, the City staff recommends the project is within the following environmental reporting category:

EXEMPT

- [ ] Exempted from environmental reporting by the following section of the EIR Guidelines:
  - [ ] MINISTERIAL (Sec. 15073)
  - [ ] EMERGENCY (Sec. 15071)
  - [ ] CATEGORICAL (Sec. _____ Class _____)

Reasons exempt: _____

By _____ Title _____ Date _____

NEG. DEC.

- [x] Negative Declaration. On the basis of an Initial Study, the Project is found to have no significant effect on the environment.

Reasons: Area of operation restricted to clin. product impacts; SEE Notice of intent to adopt neg. dec. in file

The Initial Study is on file with the Planning Department, 1400 Fifth Avenue, San Rafael, CA.

Contact [illegible] Title [illegible] Date 11/5/85

EIR

- [ ] EIR is required. On the basis of an Initial Study, it has been determined that the project may have a significant effect on the environment. Copies of the EIR will be available for review at the San Rafael Planning Department, 1400 Fifth Avenue, San Rafael, California 94902; Telephone 415/456-1112, Ext. 311.

The Draft EIR review period in which comments should be forwarded to the City will end on _____

Contact _____

DETERMINATION

- [x] A Negative Declaration was approved by: Plng Com. Date 11/26/85
- [ ] An EIR was prepared and certified in accordance with C.E.Q.A. by _____ Date _____

The Plng Com. determined that the project

- [ ] Will
- [x] Will not: have a significant effect upon the environment.

The project was [x] Approved [ ] Disapproved by _____

Date 11/26/85

A Statement of Overriding Considerations was made by _____

Mitigation measures adopted by _____ are attached.

Plng. Form 40 (6/79)

ATTACHMENT #4

CITY OF SAN RAFAEL

1400 FIFTH AVENUE, P.O. BOX 60, SAN RAFAEL
CALIFORNIA 94915-0060

MAYOR
LAWRENCE E. MULRYAN

COUNCIL MEMBERS
DOROTHY L. BREINER
GARY R. FRUGOLI
RICHARD P. NAVE
JERRY RUSSOM

RECEIVED
FEB 26 1987

February 23, 1987

Mr. Cy Armstrong
California Waste Management Board
1020 Ninth Street
Sacramento, California 95814

Re: Marin Resource Recovery Plant

Dear Sir:

This letter is a follow-up to my letter to you dated February 13, 1987, and our telephone conversation of February 20, 1987, when you requested additional information regarding the General Plan designation for the Marin Resource Recovery Plant, 1060 Andersen Drive.

The City's existing General Plan, adopted in 1974, designated the area generally as "Business and Industrial Review Area". This plan recommended that these lands be reserved for industrial, retail, commercial and office use by removing them from the categories of land on which residential development can be proposed. The plan further identifies the vicinity of Marin Sanitary Service as the "Existing Industrial Preserve", which recognizes some intermix of land uses but identifies industrial land use as the predominant use.

As I explained to you, the City is currently reviewing the Draft San Rafael General Plan 2000 which designates all of the Marin Sanitary Service facilities as Public/Quasi-Public (LU-12). This designation includes schools, government or quasi-public buildings or facilities; utility facilities; sewage treatment facilities; and solid waste management facilities.

Enclosed is a map showing existing land use and the proposed General Plan designations.

I hope this discussion is adequate for your needs. Please feel free to call me at 485-3085 if I can be of assistance.

Very truly yours,

RUBE WARREN
Associate Planner

RW/dl

cc: Guido Zanotti, Marin Sanitary Service
1050 Andersen Drive, San Rafael 94901

ATTACHMENT #5

OPERATING PERMIT FOR FACILITIES RECEIVING SOLID WASTE

TYPE OF FACILITY	FACILITY/PERMIT NUMBER
Transfer Station	21-AA-005

NAME AND STREET ADDRESS OF FACILITY	NAME AND MAILING ADDRESS OF OPERATOR
Marin Sanitary Services Transfer Station 565 Jacoby Street San Rafael, CA 94902	Marin Sanitary Service 565 Jacoby Street San Rafael, CA 94902

PERMITTING ENFORCEMENT AGENCY	CITY/COUNTY
Marin County Environmental Health Services	Marin County

PERMIT

This permit is granted solely to the operator named above, and is not transferrable.

Upon a change of operator, this permit is subject to revocation.

Upon a significant change in design or operation from that described by the Plan of Operation or the Report of Station or Disposal Site Information, this permit is subject to revocation, suspension, or modification.

This permit does not authorize the operation of any facility contrary to the State Minimum Standards for Solid Waste Handling and Disposal.

This permit cannot be considered as permission to violate existing laws, ordinances, regulations, or statutes of other government agencies.

The attached permit findings, conditions, prohibitions, and requirements are by this reference incorporated herein and made a part of this permit.

APPROVED:

Edward J. Stewart

APPROVING OFFICER

Edward J. Stewart, Chief
Environmental Health Services

NAME/TITLE

AGENCY ADDRESS

County of Marin
Environmental Health Services
Room 283, Civic Center
San Rafael, CA 94903

AGENCY USE/COMMENTS

SEAL

PERMIT RECEIVED BY CWMB	CWMB CONCURRANCE DATE
FEB 17 1987	
PERMIT REVIEW DUE DATE	**PERMIT ISSUED DATE**

CWMB (Rev. 7/84)

STATE SOLID WASTE MANAGEMENT BOARD

SOLID WASTE FACILITIES PERMIT

SSWMB E-3-77 (REV. 10/77)

ENFORCEMENT AGENCY	COUNTY	SOLID WASTE FACILITY PERMIT #
ENVIRONMENTAL HEALTH SERVICES	MARIN	21-AA-005

FACILITY NAME
MARIN SANITARY SERVICES, INC. TRANSFER STATION

OPERATOR
MARIN SANITARY SERVICES, INC. 1050 ANDERSON DRIVE, S.R.

FACILITY LOCATION
1050 ANDERSON DRIVE, 545 AND 555 JACOBY STREET, SAN RAFAEL

DATE: PROPOSED | SSWMB APPROVAL | ENFORCEMENT AGENCY APPROVAL

FINDINGS

1. This facility is an existing large volume transfer station consisting of a building approximately 37,434 square feet. The facility has expanded with a resource recovery plant consisting of 126,295 square feet. The total site consists of 10.84 acres.

   This expanded resource recovery area will recycle items that were previously disposed of in the closed San Quentin Disposal Site. The interests of the county are best served by permitting this facility since it will protect the health, welfare and safety of the public to have all trash, garbage and debris disposed of in an approved manner.

   This permit is in compliance with the Marin County Solid Waste Plan dated 1975 and is consistent with the State Minimum Standards for Solid Waste Handling and Disposal.

   Therefore this permit is issued until such time as the revised Solid Waste Management Plan is approved by the County and the California Waste Management Board.

   The original transfer station began site operations in 1980. The expanded facility will begin operations with the issuance of this permit

   The total capacity of this facility is approximately 2600 tons of waste per day for 7 days per week.

   This facility has a total permitted daily capacity of 1,000 tons per day and shall not receive more than 1,000 tons per day without first obtaining a revision to the facilities permit.

This permit is granted solely to the operator named above, and is not transferable. Upon a change of operator, this permit is subject to revocation. Upon a significant change in design or operation from that described in this permit or in attachments thereto for the existing design and operation of a facility operating immediately prior to August 15, 1977, or from the approved intended design and operation of a facility which was not operating prior to August 15, 1977, or which herein is granted a permit modification, this permit is subject to revocation, suspension, modification or other appropriate action.

This permit does not authorize the operation of any facility contrary to the State Minimum Standards for Solid Waste Handling and Disposal. This permit cannot be considered as permission to violate existing laws, ordinances, regulations, or statutes of other government agencies.

ENFORCEMENT AGENCY
Marin County Environmental Health Services

BY (SIGNATURE) Edward J. Stewart | TYPED NAME Edward J. Stewart

TITLE Chief, Environmental Health Services | DATE February 9, 1987

154

Portions of the waste volume will be diverted as recyclable materials, leaving an estimated 400 tons/day to be transferred to the Redwood Sanitary Landfill.

Types of wastes received at this site include:
a. Residential and commercial wastes
b. Construction and demolition wastes

Hazardous and infectious wastes will not be accepted at the site.

Resource recovery will be conducted at the site for all marketable resources. A description of the method of operation and resource recovery can be found in the following documents:

a. Report of Station Information, Marin Sanitary Service, prepared by Resource Technology Corporation, March, 1986.
b. Marin Resource Recovery, Operations Manual, prepared by Ron Piombo, Shop Manager, August, 1986.

There will be no significant changes in design or operation in the next five years.

Current operation hours are 8:00 a.m. to 5:00 p.m. seven days a week for commercial vehicles. Private vehicles may dump at the new Resource Recovery Building only between the hours of 8:00 a.m. and 3:00 p.m. due to a temporary traffic limitation imposed by the city of San Rafael. The facility hopes to extend these hours to 5:00 p.m. after traffic patterns have been observed.

2. The following document conditions the design and operation of this facility:

   a. Use permit: City of San Rafael #UP85-106 dated November 26, 1985.

3. The facility's design and operation will be in complicance with the State Minimum Standards for Solid Waste Handling and Disposal.

4. A negative declaration was prepared for this facility by Rube Warren and approved by the Planning Commission on November 26, 1985.

5. Provision for fire suppression include adequate fire hoses, the sprinkler systems, and arrangements with the local fire department of San Rafael. This facility meets with the local fire department of San Rafael's fire standards as evidenced by the occupancy permit issued at the completion of the building.

CONDITIONS:

Requirements:

1. The design and operation of this facility must comply with all State Minimum Standards for Solid Waste Handling and Disposal.

2. The design and operation of this facility must comply with all federal, state, and local requirements and enactments.

3. Additional information must be provided as required by the enforcement agency.

PROHIBITIONS:

The following actions are prohibited at the facility:

1. Scavenging
2. Salvaging by the public
3. Disposal of hazardous or infectious wastes
4. Disposal of septic tank pumpings or sewage sludge
5. Disposal of dead animals
6. Disposal of liquid wastes
7. Open burning of wastes

SPECIFICATIONS:

1. No significant change in design or operation from that described in Item I of the findings section is allowed, except for those changes which are required under the conditions portion of this permit. Any significant change which may be proposed for the facility shall require submission of a Revised Report of Station Information and new application for a Solid Waste Facility permit to the Local Enforcement Agency and the California Waste Management Board for review.

2. This facility must meet all requirements of the government code pertaining to safety for employees.

3. All putrescible wastes must be removed from the resource recovery area at the conclusion of each business day.

4. A site attendant must be on duty at all times that the facility is open to the public to monitor the site.

PROVISIONS:

1. This permit is subject to review by the Local Enforcement Agency, and may be suspended, revoked, or modified at any time for sufficient cause.

SELF-MONITORING:

The following items shall be monitored by the operator of the facility or a designated agent and records shall be kept and made available to the Local Enforcement Agency upon request:

1. Quantity and types of wastes received at the site per day and per week.

2. Quantity and types of wastes that are recovered for recycling.

3. Fires, injury and property damage accidents, explosions, incidents regarding hazardous wastes, flooding and other unusual occurrences.

ATTACHMENT #6

CALIFORNIA WASTE MANAGEMENT BOARD

Solid Waste Facility Determination of Conformance #87-05
Solid Waste Facilities Permit Decision #87-14
March 26 - 27, 1987

WHEREAS, the Marin County Local Enforcement Agency has submitted a revision to Solid Waste Facilities Permit #21-AA-005 to this Board for concurrence with or objection to its issuance and has requested the Board's concurrence; and

WHEREAS, the Board directed Marin County on June 23, 1983 to revise its County Solid Waste Management Plan (CoSWMP) to remain consistent with State Policy; and

WHEREAS, the County of Marin has not submitted to this Board a CoSWMP Revision that is consistent with State Policy; and

WHEREAS, the Board has determined that the Marin CoSWMP is delinquent and no longer valid because the County has not completed the CoSWMP Revision in the time required by the California Administrative Code Title 14, Section 17152; and

WHEREAS, the proposed project as required by Government Code Section 66784 is not identified in an approved CoSWMP; and

WHEREAS, the Board finds the proposed permit is not consistent with the Marin County Solid Waste Management Plan.

NOW, THEREFORE, BE IT RESOLVED, that the California Waste Management Board denies conformance with the County Solid Waste Management Plan for the expansion of the transfer station and the increase in the permitted daily capacity; and

BE IT FURTHER RESOLVED, that the California Waste Management Board objects to the issuance of revised Solid Waste Facilities Permit No. 21-AA-005.

CERTIFICATION

The undersigned Chief Executive Officer of the California Waste Management Board does hereby certify that the foregoing is a full, true and correct copy of a resolution duly and regularly adopted at a meeting of the California Waste Management Board held March 26-27, 1987.

Dated:

George T. Eowan
Chief Executive Officer

CALIFORNIA WASTE MANAGEMENT BOARD

AGENDA ITEM #10

MARCH 26 - 27, 1987

ITEM:

Consideration of the approval of the Report to the Legislature concerning shredder waste

KEY ISSUES:

- The Waste Management Board was directed by SB 976 (Bergeson, 1985) to study the need for long-term additional capacity for the disposal of shredder waste
- There is sufficient total remaining capacity in eight of the thirteen SB 976 listed landfills for long-term disposal of shredder waste
- Although listed, none of the eight long-term landfills have been **approved** by a Regional Water Quality Control Board (RWQCB) to accept shredder waste through revision of Waste Discharge Requirements.
- Currently, no **approved** long-term disposal capacity exists for shredder waste disposal in California

BACKGROUND:

In 1985, the Legislature passed SB 976 (Bergeson), which intended to allow the immediate disposal of shredder waste at a minimum of five nonhazardous (Class III) landfills as designated by five RWQCBs. Passage of this bill was expected to solve the emergency shredder waste disposal problem that had developed as a result of shredder waste being reclassified by the Department of Health Services (DHS) from nonhazardous to hazardous and finally to a designated waste.

After the bill was passed, the five RWQCBs authorized one Class II and twelve Class III landfills to accept shredder waste. However, in order to legally accept shredder waste, each authorized landfill also was subject to review, possible revision, and final approval of its waste discharge requirements. To date, only two of the authorized landfills have elected to continue with the approval procedure, and only one, the Class II landfill, has received final approval.

In order to assess the shredder waste disposal situation in the state, the Waste Management Board staff reviewed the need for disposal capacity in terms of the short and long-term total remaining disposal

capacity of the SB 976 listed landfills. Short-term was defined to be a period of landfill life expectancy of less than ten years, while long-term was defined to be a period of landfill life expectancy of more than ten years.

Currently, five of the thirteen listed SB 976 landfills have a short-term life expectancy. Of the five, only one, the Class II landfill, has been approved by a RWQCB to accept shredder waste. The remaining eight listed landfills have long-term total remaining capacity, but none of the landfills have been approved by a RWQCB through the review or revision of their waste discharge requirements to accept this waste. As a result of a lack of an approval by a RWQCB, approved short-term landfill capacity is limited and no approved long-term disposal capacity is currently available for shredder waste in California. Therefore, a need does exist for approved long-term additional disposal capacity for shredder waste in California.

RECOMMENDATIONS:

Staff recommends that the Board approve the report to the Legislature.

THE NEED FOR LONG-TERM ADDITIONAL DISPOSAL CAPACITY FOR SHREDDER WASTE

A REPORT TO THE

LEGISLATURE

SUBMITTED BY THE

CALIFORNIA WASTE MANAGEMENT BOARD

March, 1987

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I. Summary

II. Background

III. Shredder Waste Production and Management Practices

IV. Need for Additional Landfill Capacity

V. Conclusions

This report was prepared in response to SB 976 (Bergeson) Chapter 1395, statutes of 1985. The bill directed the California Waste Management Board to study the need for long-term additional capacity for the disposal of shredder waste.

I. Summary

What is shredder waste?

Shredder waste or "fluff" is the material remaining once metallic articles, such as auto bodies, appliances and sheet metal, are shredded and the metal is removed.

How much and where is shredder waste generated?

In 1985, a total of approximately 166,500 tons of shredder waste was generated by the eight shredding operations in California. The majority of waste was generated by the six shredding firms located in the southern part of the state. These six shredding operations generated 110,500 tons or 66 percent of the shredder waste, with the remaining 50,000 tons being generated by the two shredding firms operating in the northern part of the state. If all of the shredder waste generated in 1985 had been disposed of within the state, approximately 333,000 cubic yards (cy) of disposal capacity would have been needed.

Why is shredder waste a problem?

Up until 1984, this material was considered a nonhazardous waste and was disposed of in nonhazardous waste landfills or used for fill material. In 1984, shredder waste was determined to be a hazardous waste by the Department of Health Services (DHS). Subsequently, shredder waste received a variance from DHS for purposes of disposal, thus placing it out of the DHS' regulatory system and into the purview of the State Water Quality Control Board (SWQCB) as a designated waste. Designated wastes usually require Class II disposal.

How available are Class II landfills for shredder waste disposal?

Currently, there are very few Class II landfills within the state. Only two landfills (the West Contra Costa landfill in Richmond and the BKK landfill in West Covina) have been approved by the RWQCB for the disposal of shredder waste within the last seventeen months. These two landfills currently accept 60 percent of the shredder waste generated in the state for disposal. The remaining 40 percent is either being disposed of out of the state or country or is being illegally stockpiled within the state.

What has been done to solve the problem?

In 1985, the Legislature passed SB 976 (Bergeson) which intended to allow the immediate disposal of shredder waste at a minimum of five nonhazardous (Class III) landfills as designated by five Regional Water Quality Control Boards.

Passage of this bill was expected to solve the short-term shredder waste disposal problem which had developed as a result of shredder waste being classified by DHS from nonhazardous to hazardous and finally to a designated waste.

What are the results of the bill?

After the bill was passed, the five RWQCBs, as identified in the bill, listed one Class II and twelve Class III landfills that were authorized to accept shredder waste. However, it was not mandatory that the designated landfills actually accept the waste for disposal or that the landfills could or would obtain approval from the RWQCBs for shredder waste disposal. To date, none of the listed Class III landfills have been approved by the respective RWQCBs to accept shredder waste.

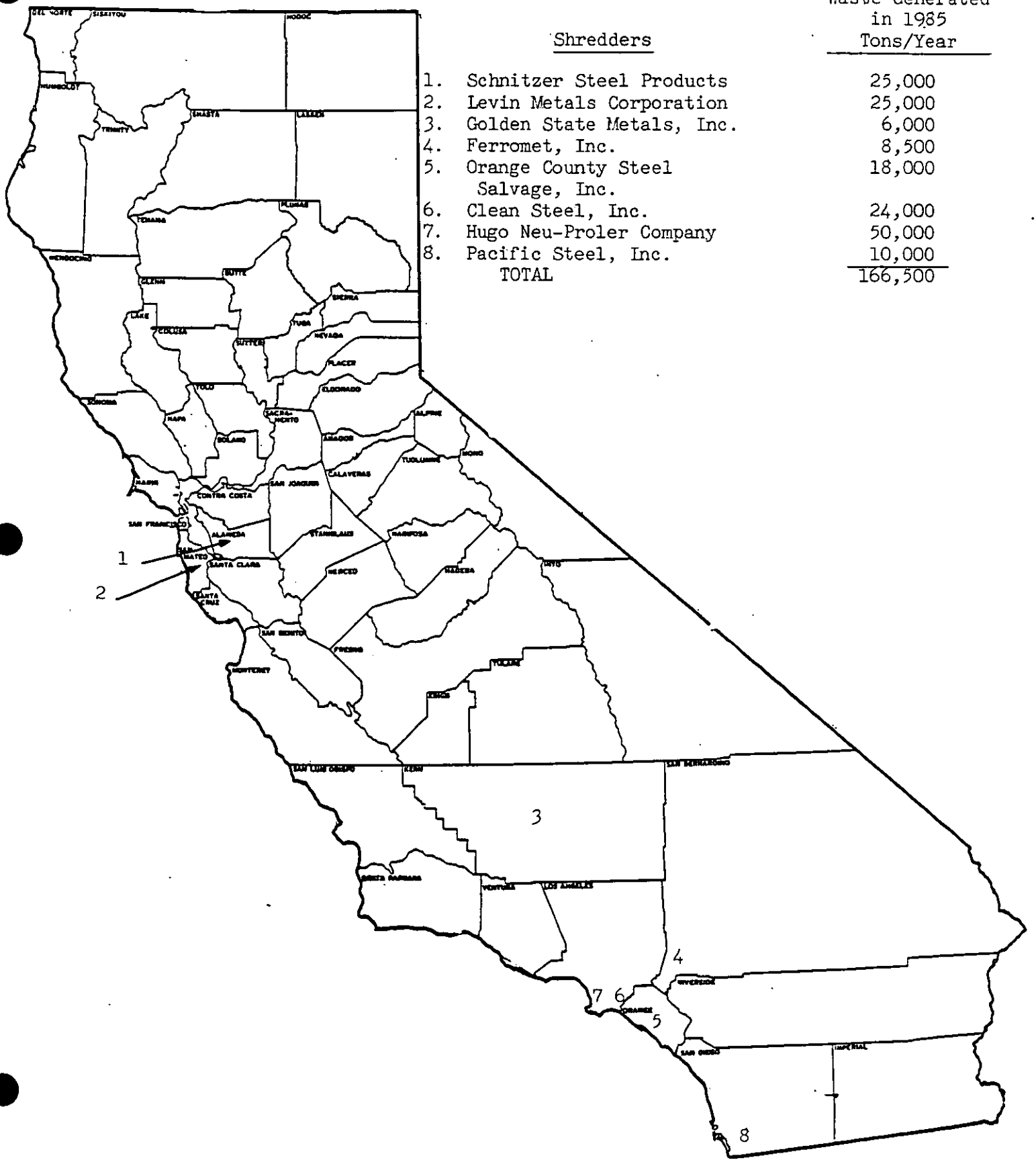
II. Background

There are eight auto shredding facilities presently operating in California. Figure 1 illustrates the location and waste production rate for each shredder. Prior to 1982, shredder waste material was commonly used as fill material in the construction of Long Beach/Los Angeles harbor. Additionally, this material was disposed of at Class II - 2 (now Class III) landfills and was considered to be nonhazardous waste. With the advent of new chemical waste characterization techniques, many wastes previously classified as nonhazardous, are being reviewed by the DHS and other state agencies for possible change in classification. Shredder waste is one type of waste that has been recently reviewed.

During April 1982, the Los Angeles County Health Department and, later, during March 1983, the State Water Resources Control Board noted high levels of lead contamination in shredder waste. The levels were in excess of the allowable limits for disposal of shredder waste into Class II - 2 (now Class III) landfills. On March 1, 1984, the DHS, after further analysis of waste samples, informed all generators and handlers of shredder waste that the waste was being classified as hazardous. Results of testing indicated that shredder waste consistently exceeded the soluble threshold limit concentration for lead, zinc, and cadmium as well as the total threshold limit concentration for lead, zinc, and copper. DHS required the management of this waste to be in full compliance with the regulations contained in Chapter 6.5, Division 4, Title 22, California Administrative Code. DHS also required the disposal of such wastes to be at a hazardous waste landfill (Class I and Class II - 1 old classification), and the landfill had to be authorized to accept this type of waste. Disposal at a Class I or Class II - 1 facility was not an economical

FIGURE 1

AUTO SHREDDER LOCATIONS



Shredders	Waste Generated in 1985 Tons/Year
1. Schnitzer Steel Products	25,000
2. Levin Metals Corporation	25,000
3. Golden State Metals, Inc.	6,000
4. Ferromet, Inc.	8,500
5. Orange County Steel Salvage, Inc.	18,000
6. Clean Steel, Inc.	24,000
7. Hugo Neu-Proler Company	50,000
8. Pacific Steel, Inc.	10,000
TOTAL	166,500

alternative for the majority of the shredder operators, and was not generally favored by Class I or Class II - 1 landfill owners who wanted to reserve space for hazardous wastes that require less volume for disposal than shredder waste.

Upon further investigation of shredder waste, DHS granted variances for the purpose of disposal as DHS determined that the waste did not pose a threat to human health or water quality if disposed of at a properly maintained and authorized Class III (formerly Class II - 2) landfill. This variance was also based on the continued operation of a heavy metals extraction program by the shredding industry. Removal of parts containing heavy metals, specifically lead laden parts such as batteries, exhaust pipes, and mufflers, was a very important aspect of issuing the variances. DHS presumed that with the removal of the parts containing heavy metals and no major material change in the character of the waste, such waste could be disposed of in a properly maintained Class III facility.

During the period of time that DHS was reviewing shredder waste for a possible variance, SB 976 (Bergeson) was introduced to the Legislature in an attempt to solve the immediate disposal problem. SB 976 was passed as an urgency statute, becoming effective October 1, 1985. SB 976 required five RWQCBs to prepare a list of Class III, nonhazardous waste landfills (including at least one landfill in each of the five specified water quality control regions) as authorized to accept and dispose of shredder waste. These sites are identified in Figure 2.

The RWQCBs identified thirteen landfills that could accept shredder waste (one Class II and twelve Class III), SB 976 did not specifically require that listed landfills agree to accept shredder waste, or that they were exempt from any other state regulations including those governing storage, transportation, manifests and the payment of hazardous waste disposal fees. The effect of designating shredder waste hazardous for purposes of storage, transportation, manifesting and fees and as nonhazardous for purposes of disposal, has resulted in very few landfill owners willing to accept the waste and increased disposal costs to shredder waste generators. To date, only one SB 976 listed landfill which is located in West Contra Costa County (Class II), has been approved by the RWQCB to continue accepting shredder waste without modification to its design or operation. In addition, the BKK landfill in West Covina (not a SB 976 designated landfill) has been authorized to accept chemically treated shredder waste from Hugo Neu-Proler Corporation only. While a temporary solution has been found for shredder waste in Northern California, the situation in Southern California is not much better than before SB 976 was passed.

FIGURE 2

DESIGNATED LANDFILLS

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The shredder owners, recognizing that SB 976 did not solve their disposal problems, have requested that their local landfills and RWQCBs review the SB 976 designated landfills in the hope that several of these landfills would be approved to accept shredder waste. In general, the response to this effort has been nill. In addition, local landfill owners and operators have several concerns that haven't been addressed by SB 976 or by various local and state government agencies. These concerns include: long term waste designation, liability, costs and paperwork. Until these issues can be resolved, it appears that most shredder waste generators in Southern California will be forced to continue transporting their waste out of the state, country or to stockpile it illegally on their own property.

III. Shredder Waste Production and Management Practices

In estimating the amount of shredder waste requiring disposal both now and in the future, staff of the CWMB visited each of the shredder operations in the state. The bulk of the shredder waste generated in the state is derived from the shredding of autos. These visits yielded production figures, future plans and general observations from the operators.

Generally speaking, auto shredder operations and waste production have been fairly constant over the past ten years, with any increases in processed autos attributable to population increases, rather than the market for recovered metals. Production is expected to increase due to an estimated two percent increase in the California population over the next several years. However, if the lack of approved landfill space is not resolved in the near future, production could drop dramatically (especially in Southern California) and a backlog of autos for disposal may result. The lack of approved landfills for disposal and the increased costs for legal disposal of this material, may result in the closure of several shredding operations.

In relation to the amount of nonhazardous waste generated in California each year, shredder waste is a very small percentage (0.5 percent). Statewide, 35 million tons of nonhazardous solid waste is produced each year while in 1985 less than 200,000 tons of shredder waste was produced.

If it is assumed that production will not be reduced and a two percent annual growth rate in shredder waste production will occur, the following projection, in tons per year result:

Operator	1985	1995	2005
Schnitzer Steel	25,000	30,500	37,200
Levin Metals	25,000	30,500	37,200
Golden State Metals	6,000	7,300	8,900
Ferromet	8,500	10,400	12,600
Orange Co. Steel Salvage	18,000	21,900	26,700
Clean Steel	24,000	29,300	35,700
Hugo Neu-Proler	50,000	61,000	74,300
Pacific Steel	10,000	12,200	14,900
	166,500	203,100	247,500

The eight companies which shred metallic articles have been utilizing a combination of options for the management or disposal of the shredder waste they generate. The waste management options that each individual company has been employing recently are as follows:

Schnitzer Steel - Waste taken to West Contra Costa Landfill, a II-I RWQCB approved site capable of accepting the waste without landfill modification.

Levin Metals - Waste taken to Turk Island, an undesignated site, in early 1986. Waste currently being taken to West Contra Costa County landfill, a Class II RWQCB approved site capable of accepting the waste without modification.

Clean Steel - Waste transported to Arizona for disposal, where waste is nonhazardous according to EPA testing criteria.

Hugo Neu-Proler - Waste stockpiled until October, 1986. Waste now being chemically treated to reduce leachable heavy metals. Disposal of treated shredder waste at BKK landfill in West Covina.

Pacific Steel - Stockpile of waste on site, as well as, waste transported to Mexicali for further processing and disposal by another company owned facility.

Golden State Metals - Stockpiling of waste on site.

Ferromet - Stockpiling of waste on site.

Orange Co. Steel Salvage - Stockpiling of waste on site. Waste pile tested for polychlorinated biphenyls (PCBs). PCB concentration greater than 50 ppm, the Environmental Protection Agency (EPA) is the lead agency for this site. Company is pursuing the development of a landfill for shredder waste disposal.

IV. Need for Additional Landfill Capacity

At the present time, there is sufficient total landfill capacity remaining in the SB 976 listed Class III landfills to be able to accommodate all of the shredder waste generated in the state. However, none of the listed Class III landfills with sufficient remaining capacity have been approved by a RWQCB as authorized to accept shredder waste. As a result, the proper disposal of approximately 40 percent (133,200 cy) of the shredder waste generated within California is not assured. Therefore, an assumption has been made that there is a need for more Class III landfills, with sufficient total remaining capacity to be approved by a RWQCB to accept shredder waste for disposal within the state.

The need for more landfills with sufficient disposal capacity for shredder waste in California is a regional as well as a short and long-term landfill life expectancy problem. In this report, short-term is defined to be a period of landfill life expectancy of less than ten years from a established reference point. Long-term is defined to be a period of landfill life expectancy of more than ten years from a established reference point. The reference point for this review is 1986. Approximately seventeen months after the passage of SB 976, only two landfills have been RWQCB approved to accept shredder waste for disposal. These two landfills currently accept 60 percent of the total shredder waste generated within the state. The remaining 40 percent of the total shredder waste generated (all in Southern California) is still being transported out of the state, country or is being illegally stockpiled on private property. While the need for immediate approved landfill shredder waste disposal capacity has been reduced from 100 to 40 percent of the the total shredder waste generated since the passage of SB 976, the problem is far from solved.

Landfills Approved for Shredder Waste Disposal

Northern California

The West Contra Costa County landfill in Richmond is the only SB 976 listed landfill that has been approved by a RWQCB to accept shredder waste for disposal. The landfill has a remaining total capacity for all waste of 13.3 million cy, and is currently accepting 30 percent (100,000 cy) of the total shredder waste generated in the state. Presently, shredder waste from Schnitzer Steel and Levin Metals is disposed of at the landfill. As the landfill capacity provides for short-term disposal only, it is likely that these two firms will be able to continue disposal at this landfill until the landfill closure in 1992. However, it will be necessary to plan and provide for long-term disposal capacity in Northern California to ensure continued disposal facilities.

Southern California

The other landfill currently approved to accept shredder waste in the state is the BKK landfill in West Covina. This landfill, while not listed as designated to accept shredder waste under SB 976, has been approved by the Los Angeles RWQCB to accept chemically treated shredder waste generated by Hugo Neu-Proler Corporation. Hugo Neu-Proler Corporation, who presently generates 30 percent (100,000 cy) of the total shredder waste produced by the industry, is currently the only company which has a chemical treatment process on-line, and is the only company which is authorized to take its shredder waste to the BKK landfill. Several shredder owners have conducted negotiations with Hugo Neu-Proler in an attempt to obtain the chemical treatment process. It was the intent of these shredder owners to dispose of their waste at BKK if they could obtain the chemical treatment process for a reasonable price and if approval for disposal could be obtained from the Los Angeles RWQCB and BKK. To date, the shredder operators have indicated that they can't afford to purchase the chemical treatment process from Hugo Neu-Proler.

The disposal of waste at the BKK landfill should be viewed as tenuous or short-term at best for the immediate future. Currently, BKK is in the process of closing a portion of its landfill while trying to permit a new facility. How long Hugo Neu-Proler will be allowed to dispose of chemically treated shredder waste at this landfill is not known at this time.

It is apparent that as these landfills are the only ones currently approved by a RWQCB for the disposal of shredder waste, have a short-term life expectancy and account for the disposal of only 60 percent of the total shredder waste generated within the state that there is a definite need for RWQCB landfill approvals. Approval should be sought for the listed SB 976 Class III landfills or for other Class III landfills that offer both short-term and long-term landfill capacity for the disposal of shredder waste within California.

Status of other SB 976 Designated Landfills

In collecting information for this report, a survey was made of all of the landfills listed by the five RWQCBs per SB 976. Table 1 lists these landfills along with pertinent data regarding total (all waste) remaining landfill capacity, landfill life (closure date) and comments from facility personnel. The following information is an analysis of this information on a regional basis.

Northern California

Two Class III landfills (Kirby Canyon and Durham Road) were listed by the SWQCB as a result of SB 976 as potential sites for shredder waste disposal. At the present, neither landfill is interested in accepting shredder waste for disposal. The Kirby Canyon landfill is a relatively new site and is satisfied with its current waste disposal situation, while the Durham Road landfill is currently reserving space for posssible waste to energy residue. If either landfill should decide to accept shredder waste in the future, both have plenty of total waste remaining capacity (58.9 million cy). Both landfills could provide part or all of the long-term disposal capacity for the estimated 57,500 cy of shredder waste that will be needed when the West Contra Costa County landfill closes in 1992.

Southern California

As a result of SB 976, ten Class III landfills were listed by the SWQCB as potential facilities for shredder waste disposal. Four of the ten landfills (China Grade, Arvin, Olinda and Chiquita Canyon) have short-term remaining capacity with closure dates of 1989, 1991, 1992, and 1990 respectively. The China Grade and Arvin landfills have expressed an interest in accepting shredder waste and are being reviewed by the Central Valley RWQCB. At this time, it appears that the China Grade landfill is preferred by the county and the RWQCB for shredder waste disposal while the shredder owner in the area, Golden State Metals, would prefer to dispose of waste at the Arvin landfill. If approved, either landfill would have capacity to accept the 12,000 cy of shredder waste generated by Golden State. This would then eliminate stockpiling of shredder waste on Golden State property. The Olinda landfill is not interested in accepting shredder waste because shape constraints at the landfill and proposed RWQCB waste management techniques would make the disposal too costly. At the time of this survey (November, 1986) the Chiquita Canyon landfill had not contacted the Los Angeles RWQCB regarding shredder waste. The owners were waiting to see how the disposal of shredder waste at BKK was working and decided to review accepting shredder waste at a later date.

The other six Class III landfills in Southern California (Miramar, Otay, Prima Deschecha, Lamb Canyon, Badlands and San Timeteo) represent 189.6 million cy of total remaining landfill capacity. While there is more than suffficient remaining long-term capacity to accommodate the current 233,100 cy of shredder waste generated in Southern California, most landfill owners indicate that they will not accept shredder waste. Miramar is reserving its capacity for residue from a waste to energy project. Otay

TABLE 1 - STATUS OF SB 976 LISTED LANDFILLS

Regional Board	Remaining Capacity	Closure Date	Comments
Los Angeles			
Chiquita Canyon	6 million c.y.	1990	Have not petitioned RWQCB to accept shredder waste
San Francisco			
Kirby Canyon, San Jose	37.4 million c.y.	2040	Just beginning operation, no immediate interest in accepting shredder waste
Durham Road, Fremont	21.5 million c.y.	2014	Disposal unlikely at this time; no interest in taking shredder waste. Reserving space for possible waste-to-energy project.
West Contra Costa, Richmond	13.3 million c.y.	1992	Class II site; will likely continue accepting shredder waste
Central Valley			
China Grade	4.9 million c.y.	1989	Site preferred by County, waste tested, waiting for variance from DHS. Next step obtain waste discharge req. from WQ.
Arvin	1.8 million c.y.	1991	Site preferred by producer of shredder waste, but no petition to RWQCB yet. Unlikely to be accepted by RWQCB.
San Diego			
Miramar	16 million c.y.	2000	Unlikely to accept shredder waste; reserving capacity for waste-to-energy project
Otay	41.5 million c.y.	2004	Have not petioned RWQCB to accept shredder waste. Formed task force with local agencies, shredders, dismantlers to discuss problems.

Table 1 Continued

Regional Board	Remaining Capacity	Closure Date	Comments
San Diego			
Prima Deschecha	76 million c.y.	2005	Unlikely to accept shredder waste due to classification problems. Shape constraints at site making approval by RWQCB unlikely.
Santa Ana			
Lamb Canyon	48.7 million c.y.	2018	Unlikely to accept shredder waste due to county restrictions on importation of waste and cost to upgrade site.
Badlands	5 million c.y.	2039	Unlikely to accept shredder waste due to county restrictions on importation of waste
Olinda	18 million c.y.	1992	Unlikely to accept shredder waste due to classification problems. Shape constraints at site make approval by RWQCB unlikely.
San Timoteo	2.4 million c.y.	2000	Have not petitioned RWQCB to accept shredder waste

may consider accepting the waste from a limited service area if it can work out local concerns, and costs. Prima Deschecha indicated that the monofilling of shredder waste proposed by the San Diego RWQCB and landfill shape constraints make accepting the waste almost impossible. Lamb Canyon and Badlands landfills indicated that county importation of waste restrictions and cost to upgrade the landfill prevent the disposal of shredder waste at these sites. San Timeteo is considering the possibility of accepting shredder waste but may only accept waste from a limited service area.

V. Conclusions

The Legislature required the CWMB to address the need for long-term additional disposal capacity for shredder waste. Presently, there is sufficient total remaining capacity in eight of the thirteen SB 976 listed landfills for long-term disposal of shredder waste. However, none of these landfills have been approved by a RWQCB to accept this waste. As a result of a lack of an official approval, no long-term displqal gapacity is currently available for shredder waste in the state of California.

CALIFORNIA WASTE MANAGEMENT BOARD
Agenda Item #11-A
March 26-27, 1987

Item:

Consideration of notifying the operator of the Landers Disposal Site (San Bernardino County) of the Board's intent to include that facility on the State List of Non-Complying Facilities as required by Government Code Section 66796.38.

Key Issues:

- An evaluation of all available data regarding compliance of the Landers Disposal Site with State Minimum Standards has recently been completed.
- The evaluation includes three inspections by California Waste Management Board (CWMB) staff.
- Repeated violations of the following sections have been documented:

  17710 - Grading of Fill Surfaces
  17751 - Periodic Site Review

- Staff recommends that the site operator be directed to establish a compliance schedule within 30 days. The Chief Executive Officer would be authorized to issue a 90-day notice of the Board's intent to place the site on the State List of Non-Complying Facilities if the adopted compliance schedule is not met.

Site Information:

Name:	Landers Disposal Site
SWIS #:	36-AA-57
Facility Type:	Class III (new classification)
Operational Status:	Open
Location:	One mile east of Landers Lane (San Bernardino County)
Setting:	Rural
Permitted Volume	14 TPD
In Place Tonnage/Volume:	150,000 Tons
Permitted Acreage:	650 acres
Facility Owner:	Bureau of Land Management
Facility Operator:	San Bernardino County Public Works

Inspection Summary:

CAC Section	1st Inspec. 11/18/85	2nd Inspec. 7/14/86	3rd Inspec. 12/15/86
17710 - Grading of Fill Surfaces	Comply	Violation	Violation
17751 - Periodic Site Review	Comply	Violation	Violation

Background:

Landers Disposal Site is an existing 650 acre Class III (new classification) landfill which is permitted to accept 14 tons of waste per day. The facility began operations some time in 1965 and received a Solid Waste Facilities Permit on June 29, 1979. According to the permit, the life expectancy of the site is 30 years.

Types of waste received at this site include:

a) Residential Waste
b) Commercial Waste
c) Tires
d) Construction and Demolition Debris
e) Liquid Waste (septic tank pumpings, chemical toilet waste, etc.)

The facility is not permitted to accept hazardous waste.

Land surrounding the site is unincorporated and primarily desert.

Related Issues:

The facility has a #2 Ranking under the Calderon Program. According to Ron Rodriguez, Area Engineer, Regional Water Quality Control Board, no SWAT proposal has been submitted. The due date for the proposal is April 1, 1987. There is no groundwater monitoring required at this time, however, vadose zone and groundwater monitoring will be required under Calderon legislation and Subchapter 15.

Mr. Rodriguez also stated the Water Board approved the acceptance of a salt coke made up of a by-product from an aluminum production plant. The material has been classified as non-hazardous by the California Department of Health Services. However, complaints to the Water Board have been registered about the material in question and its effect on the environment.

Dick Hornby, Registered Sanitarian, stated that the local water district and other individuals have also registered complaints with the Health Department about the material.

According to Mr. Hornby, the Health Department has not approved of the acceptance of the salt coke and are not sure if they must give approval. Mr. Hornby also stated that they are against the site accepting the material.

Past Compliance:

For the period between April 10, 1984 and January 21, 1986, two inspections by the Local Enforcement Agency were conducted. Violations noted by the LEA were:

CAC Section	Number of Violations
17657 - Entry Signs	1
17711 - Litter Control	2
17743 - Liquid Wastes	1

Recent Compliance:

During the California Waste Management Board Evaluation period for Landers Disposal Site (November 18, 1985 to December 15, 1986) there was one inspection reported by the Local Enforcement Agency. Sections found in violation were:

17657 - Entry Signs
17711 - Litter Control
17743 - Liquid Wastes

A chronology of events occurring during the Presley evaluation period is presented below:

November 18, 1985

The first of three inspections by the California Waste Management Board was conducted by Cheryl Hisatomi. Sections in violation are as follows:

17656 - Identification Sign
17657 - Entry Sign
17666 - Sanitary Facilities
17711 - Litter Control
17668 - Communication Facilities
17670 - Personnel Health & Safety

All other applicable sections were found to be in compliance.

January 21, 1986

Jack Baker and Laura Wallace conducted an LEA inspection of the subject facility and found the following violations:

17657 - Entry Signs
17711 - Litter Control
17743 - Liquid Wastes

(See Attachment #1.)

February 12, 1986

Results of the first inspection were transmitted to the operator and the LEA. The cover letter advised the operator of the nature of the evaluation program and the consequences of non-compliance (Attachment #2).

May 13, 1986

A letter dated May 6, 1986 was received from D. Max Buchanan, Solid Waste Operation Manager, outlining corrective actions taken to bring Landers Disposal Site into compliance with State Minimum Standards (Attachment #3).

July 14, 1986

The second Presley inspection was conducted by Allen Freihofer. Sections in violation are:

17684 - Intermediate Cover
17710 - Grading of Fill Surfaces
17751 - Periodic Site Review

Section 17616 (Report of Disposal Site Information) was given an indeterminate status. All other applicable sections were in compliance.

October 24, 1986

Results of the second Presley inspection were transmitted to the operator and the LEA. The cover letter again advised the operator of the nature of our evaluation program and the consequences of non-compliance. (Attachment #4).

December 15, 1986

The third Presley inspection was conducted by Herbert Berton. Sections in violation are as follows:

17710 - Grading of Fill Surfaces
17751 - Periodic Site Review

All other applicable sections were in compliance.

February 19, 1987

Results of the third inspection were transmitted to the operator and the LEA. The cover letter reiterated the nature of our evaluation program. It also informed the operator and LEA of staff's intent to have the Board consider placing Landers Disposal Site on the State List of Non-Complying Facilities at its March meeting unless corrective measures are taken.

Summary:

Landers Disposal Site has been evaluated by the California Waste Management Board for compliance with State Minimum Standards. All pertinent information, including data gathered during three inspections conducted since November of 1985, has been reviewed. On going violations with the following sections have been documented:

17710 - Grading of Fill Surfaces 17751- Periodic Site Review

Laura Wallace (LEA contact person) concurs with our findings during our Presley evaluation.

Board Options:

Option #1

Direct the operator to establish a schedule for bringing the site into compliance with State Minimum Standards.

Under this option, the operator must submit a compliance schedule to the Board within 30 days stating specific dates for initiating and completing the required actions outlined below. If an agreeable schedule is not received by the Board within 30 days, and/or if dates specified for implementing and completing the required actions are not met, this option authorizes the Chief Executive Officer to issue a 90 day notice of the Board's intent to place the site on the State List of Non-Complying Facilities.

Specified Actions

17710 - Grading of Fill Surfaces

1) Establish and begin implementation of a work plan designed to correct subsidence problems on top of the landfill. This work plan should include the filling and regrading of problem areas so as to promote the complete lateral runoff of precipitation from the top of the landfill.

17751 - Periodic Site Review

1) Commence Periodic Site Review by a registered engineer to determine if any significant changes have occurred in site design or operation.

Option #2

Notify the operator of the Board's intent to place Landers Disposal Site on the State List of Non-Complying Facilities unless the following action is taken within 90 days of notice:

The operator must develop a compliance schedule that is mutually agreed upon by the Board and the Local Enforcement Agency for completion of the required actions outlined in Option #1. Failure to meet any deadline contained in the compliance schedule will result in a recommendation by staff that the Board place the site on the State List of Non-Complying Facilities. In no case will such a recommendation be made in less than 90 days. Verification of all deadlines will be made through additional staff inspections as necessary.

Option #3

No Action.

Notification:

The site operator and LEA have been invited to present to the Board at its March meeting any information relevant to the matter under consideration.

Recommendation:

Based on information available to staff at the time of the report, staff recommends that the Board implement Option #1.

Landers Disposal Site

Attachments

#1 LEA inspection of subject facility, January 21, 1986.

#2 1st CWMB Inspection Report, February 12, 1986.

#3 Operator response to 1st CWMB Inspection, May 13, 1986.

#4 2nd CWMB Inspection Report, October 24, 1986.

#5 3rd CWMB Inspection Report, February 19, 1986.

JAN 27 1986 DOT 1068
175/17H chen

SW13-09 (REV. 1/85)

NOTICE OF INSPECTION
DISPOSAL SITE

LOCAL ENFORCEMENT AGENCY: San Bernardino Co. Health

FACILITY FILE NUMBER (COUNTY LEA NUMBER)	PROGRAM CODE	INSPECTION DATE (MM DD YY)	T-OUT	TOTAL TIME (DECIMAL HOURS)
36 - AA - 057	L	(1011) 01 - 21 - 86	2:30	(1031) 1
			T-IN 1:30	

FACILITY NAME: Landers disposal site

FACILITY LOCATION:

INSPECTOR: L. Willey / L. Baker

ALSO PRESENT:

RECEIVED BY:
Operator _____
Owner _____

Comments: Provide litter control on north side, top of site
Repair approach to north liquid waste pond
No general information sign currently on site - new one being prepared

	*V	C
(3011) RECORDS		
☑ ACCURATE WEIGHT/VOLUME RECORDS MAINTAINED 17636		
☑ ADEQUATE SUBSURFACE RECORDS MAINTAINED 17637		
☑ LOG OF SPECIAL OCCURRENCES MAINTAINED 17638		
☑ RECORDS AVAILABLE FOR INSPECTION 17639		
(3021) PERSONNEL		
☑ ADEQUATE NUMBER OF QUALIFIED PERSONNEL AVAILABLE 17646		
☑ PERSONNEL ADEQUATELY TRAINED 17647		
☑ ADEQUATE SUPERVISION PROVIDED 17648		
☑ SITE ATTENDANT AVAILABLE FULL-TIME OR AS DETERMINED BY LEA 17649		
(3031) SIGNS		
☐ IDENTIFICATION SIGNS AT EACH POINT OF ACCESS 17656		
☑ ENTRY SIGN STATES FEES, HOURS OF OPERATION, WASTES ACCEPTED/NOT ACCEPTED 17657		
☐ NON-HAZARDOUS UNATTENDED SITES HAVE SIGN WARNING USERS OF UNAVAILABILITY OF COMMUNICATION FACILITIES 17658		
(3041) SECURITY		
☑ ADEQUATE PERIMETER SECURITY, HAZARDOUS AREAS FENCED AND IDENTIFIED 17659		
(3051) ROADS		
☑ ACCESS ROADS HAVE SMOOTH SURFACE, MINIMIZE DUST AND TRACKING OF MUD, AND ALLOW ALL-WEATHER ACCESS 17659		
☑ INTERNAL ROADS IN SAFE CONDITION, PROVIDE ACCESS DURING INCLEMENT WEATHER, AND ARE PROVIDED WITH DIRECTIONS 17660		
(3071) SANITATION		
☑ ADEQUATE SANITARY FACILITIES AVAILABLE 17666		
☑ SAFE ADEQUATE DRINKING WATER AVAILABLE 17667		
(3081) COMMUNICATIONS		
☑ COMMUNICATION FACILITIES AVAILABLE WHERE HAZARDOUS WASTES ARE ACCEPTED 17668		
(3091) LIGHTING		
☐ LIGHTING ADEQUATE 17669		
(3101) SAFETY		
☑ SAFETY EQUIPMENT IN USE AND BEING WORN 17670		

	V	C
(3111) CONFINED UNLOADING		
☑ UNLOADING ADEQUATELY CONFINED 17676		
(3141) SPREADING/COMPACTING		
☑ SPREADING AND COMPACTION IN TWO-FOOT LAYERS 17677		
(3151) SLOPES/CUTS/GRADING		
☑ WORKING FACE SLOPES ALLOW EFFECTIVE COMPACTION, DEPTH OF CUTS AND SLOPES OF TRENCH SIDES AS APPROVED BY LEA 17678		
☑ FINAL SLOPES HAVE NEAT APPEARANCE AND ARE 1-3/4 : 1 OR FLATTER 17679		
☑ GRADING OF FILL SURFACES ADEQUATE 17710		
(3161) COVER		
☑ STOCKPILING OF COVER DOES NOT INTERFERE WITH OPERATIONS 17680		
☑ SUITABLE QUALITY AND SUPPLY OF COVER MATERIAL AVAILABLE 17681		
☑ COVER PROVIDED AT REQUIRED DEPTH AND FREQUENCY 17682		
☐ INTERMEDIATE COVER PROVIDED AT REQUIRED DEPTH AND FREQUENCY 17684		
☑ FINAL COVER PROVIDED AS REQUIRED 17685		
(3171) SALVAGING/PROCESSING		
☑ SCAVENGING PROHIBITED 17686		
☑ SALVAGING DOES NOT INTERFERE WITH OPERATIONS 17687		
☑ VOLUME REDUCTION AND ENERGY RECOVERY DO NOT INTERFERE WITH OPERATIONS OR CREATE HEALTH, SAFETY OR ENVIRONMENTAL PROBLEMS 17688		
☑ SALVAGING AND VOLUME REDUCTION CONFINED TO CLEARLY IDENTIFIED AREAS 17689		
☑ SALVAGE STORAGE LOCATION OR VOLUME AS APPROVED BY LEA, MINIMIZES FIRE, NUISANCE 17690		
☑ SALVAGE STORAGE TIME DOES NOT RESULT IN HEALTH OR FIRE PROBLEMS 17691		
☑ SALVAGED MATERIALS APPROVED BY LEA AND LOCAL HEALTH 17692		
(3181) NUISANCE		
☑ OPERATIONS DO NOT CREATE A PUBLIC NUISANCE 17701		
☑ FEEDING OF REFUSE TO ANIMALS FOR HUMAN CONSUMPTION PROHIBITED 17702		

	V	C
(3191) FIRE		
☑ FIRE CONTROL ADEQUATE 17703		
(3192) FIRE (P)		
☐ BURNING MATERIALS SPREAD AND EXTINGUISHED, LEA, SWMB NOTIFIED IMMEDIATELY OF FIRE NOT EXTINGUISHED IN 24 HOURS 17683		
(3201) LEACHATE		
☐ ADEQUATE STEPS TAKEN TO MONITOR, COLLECT, TREAT, AND DISPOSE OF LEACHATES 17704		
☑ NO WASTES IN DIRECT CONTACT WITH WATER EXCEPT AS APPROVED BY RWQCB 17705		
(3202) LEACHATE (P)		
☑ REFUSE COVERED WITH NEXT DAY'S REFUSE OR WITH SIX INCHES OF COMPACTED SOIL. TOTAL AREA OF EXPOSED REFUSE IS AS SPECIFIED FOR WET AND DRY SEASONS 17683		
(3211) GAS		
☑ GAS MONITORING AND CONTROL AS REQUIRED 17709		
(3221) DUST		
☑ DUST CONTROL ADEQUATE 17706		
(3231) VECTORS/BIRDS		
☑ VECTOR AND BIRD CONTROL ADEQUATE 17707		
☑ LIQUID PONDS MINIMIZE VECTOR PROPAGATION 17713		
(3232) VECTORS (P)		
☑ THRESHOLD VALUES FOR VECTOR POPULATIONS NOT EXCEEDED 17683		
(3241) DRAINAGE/EROSION		
☑ DRAINAGE AND EROSION CONTROL ADEQUATE 17708		
(3251) LITTER		
☑ LITTER CONTROL ADEQUATE 17711		
(3252) LITTER (P)		
☑ LITTER NOT ALLOWED TO MIGRATE OFF-SITE 17683		
(3261) NOISE		
☑ NOISE CONTROL ADEQUATE 17712		
(3271) ODOR		
☑ ODOR CONTROL ADEQUATE 17713		
(3272) ODOR (P)		
☑ AMBIENT AIR AT OR BEYOND FACILITY BOUNDARY IS NOT ODOROUS 17683		

	V	C
(3281) TRAFFIC		
☑ TRAFFIC CONTROL ADEQUATE WITHIN SITE. TRAFFIC MINIMIZES INTERFERENCE, SAFETY PROBLEMS, AND STACKING ON PUBLIC ROADS 17714		
(3291) EQUIPMENT		
☑ EQUIPMENT ADEQUATE IN TYPE, CAPACITY, AND NUMBER, AND IS ADEQUATELY MAINTAINED 17726		
☑ STANDBY EQUIPMENT AVAILABLE TO C WITH SEC. 17682 AND SECTIONS 17737		
(3301) MAINTENANCE		
☑ EFFECTIVE MAINTENANCE PROCEDURES AND PROGRAMS DEVELOPED AND UTILIZED 17731		
☑ ADEQUATE MONITORING AND REPAIR OF DETERIORATED CONDITIONS 17732		
(3311) CLOSURE		
☐ AFTER CLOSURE, IF LEACHATE, EXTENSIVE SURFACE CRACKING OR SETTLEMENT OCCURS, THE OWNER SHALL NOTIFY LEA AND SHALL MONITOR AND REPAIR SITE FOR A PERIOD OF 5 YEARS OR LONGER 17734		
☐ UPON SITE CLOSURE, DETAILED DESCRIPTION MUST BE FILED WITH THE LEA AND WITH THE COUNTY RECORDER 17735		
(3321) SPECIAL WASTES		
☐ BURNING WASTES IMMEDIATELY SPREAD AND EXTINGUISHED IN SAFE AREA 17741		
☐ SITE ACCEPTS ONLY APPROVED HAZARDOUS WASTES AND TAKES PRECAUTIONS TO ELIMINATE OR CONTROL HARMFUL DUSTS, FUMES, MISTS, VAPORS, OR GASES 17742		
☑ LIQUID WASTES APPROVED BY RWQCB, LOCAL HEALTH ENTITY AND LEA 17743		
☐ DEAD ANIMALS ALLOWED BY LOCAL REGULATIONS 17744		
(3331) OTHER		
☐ _____		

*V = Violation
C = Compliance

DISTRIBUTION: WHITE — CWMB YELLOW — OPERATOR PINK — LEA

185

Cheryl

STATE OF CALIFORNIA

GEORGE DEUKMEJIAN, Governor

CALIFORNIA WASTE MANAGEMENT BOARD
1020 NINTH STREET, SUITE 300
SACRAMENTO, CA 95814

Date: February 12, 1986

To: Mr. Charles Laird, Director
Solid Waste Management
825 E. Third Street
San Bernardino, Ca. 92415

Subject: Report of inspection: Landers Disposal Site
36-AA-57

Government Code Section 66796.38 requires the California Waste Management Board (Board) to conduct inspections of solid waste facilities for the purpose of evaluating compliance with the State Standards for Solid Waste Handling and Disposal (Title 14. California Administrative Code, Division 7 Chapter 3, commencing with section 17200). Under this program, each facility will be inspected at least three separate times. As you are aware by now, staff has already conducted one of these inspections at the subject facility. The date of that inspection was November 18, 1985. A copy of that inspection report is enclosed. If photographs are referred to in the inspection report copies will be obtainable upon written request.

The goal of our inspection program is to verify compliance with each of the State Minimum Standards, not merely to find violation(s) of these standards. In order to achieve this we will, as I stated above, be inspecting each facility at least three times. This will provide the following advantages over the previous inspection techniques:

* The program will provide greater fairness to operators of facilities by reducing the possibility that one operator will be inspected under adverse conditions and another under favorable conditions.

* The program will allow for evaluation of conditions, which show seasonal variations such as effectiveness of leachate control systems, vectors, dust, etc.

* The program will provide a track record of compliance which will be used in evaluating standards for which a single violation may not be sufficient reason to place the facility on the State List of Non-Complying Facilities when the facility is generally in compliance with that standard, i.e., the daily cover standard.

Although we do not intend to provide advance notice of the inspection dates to operators, the Local Enforcement Agency (LEA) will be notified of those dates, and will be invited to accompany our staff on the inspection.

If, after three inspections, your facility continues to be operating in violation of one or more of the State Minimum Standards you will be notified of this finding by certified letter. A copy of that letter will be sent to the LEA. After 90 days or upon notification of correction of all violations(s), Board staff will reinspect the facility. If the facility is still in violation, staff will notify you and the LEA, by certified letter of staff's intent to recommend that the Board place the facility's name on the State List of Non-Complying Facilities at a regularly scheduled meeting of the Board. Should the Board place the facility on that list, State law (Government Code 66796.39) requires that the LEA develop a compliance schedule for correction of the violation(s). If compliance is not achieved within one year, Government Code section 66796.39 directs LEAs to revoke facility operating permits. If the facility is closed or abandoned, staff will recommend that the LEA issue a notice of violation and an order to correct the violations. That Notice and Order will also notify you or the owner of the facility that State law provides that "the unremedied condition of the facility is prima facie evidence of negligence, and in any action for damages against the owner of the property for injury caused by the unremedied condition, the burden of proving the injury was not caused by an unremedied condition shall be on the owner of the property".

If you have any questions regarding the program, please contact me at (916) 322-6172.

Sincerely,

Kerry D. Jones

Kerry D. Jones, Chief
Enforcement Division

cc: LEA

mea

Cheryl Hisatomi
First Inspection

LANDERS DISPOSAL SITE
LANDERS AREA
36-AA-57

On November 18, 1985 at 7:30 a.m., Jack Baker and I arrived at the Landers disposal site.

Section 17656
No Indentification sign was observed during my visit. Conrad Mansir,Operations Supervisor, Solid Waste Management, San Bernardino County, told me that there was an identification sign but that it had recently been stolen. It seems that theft and vandals make it difficult for them to keep signs up.

Section 17657
No entry sign was observed during may visit.

Section 17666
The site is overseen daily by a contract caretaker.There are no sanitary facilities available for the on-site caretakers.

Section 17668
The site should have a sign warning users that no communication facilities are available. According to Ron Steiger, Site Supervisor, there are radios on the equipment. However, the site is uncontrolled and the public may dump during periods when the caretakers and the equipment operators are not present.

Section 17670
The caretakers salvage aluminum, bottles, metals and anything else still usable. They also act as spotters. They do a good job directing traffic and segregating public and commercial dumpers, but do not wear safety vests or gloves.

Section 17711
To the north of the active face is the fenced inactive area. This area had extensive litter (see photo #9 roll 1). There was also a significant amount of litter past the third litter fence (see photo #8, roll 2).

Litter has been incorporated into the soil along the 2nd litter fence. (see photo #12, roll 1).

Cheryl Hisatomi

Landers Disposal Site

Based on my observations the Landers Disposal Site is in non-compliance of the following State Minimum Standards:

17656 - Id Sign
17657 - Entry Sign
17666 - Sanitary Facilities
17668 - Lack of Communication Warning Sign
17670 - Safety Equipment in use and worn
17711 - Litter

Cheryl Hisatomi

1853

MAY 13 1986
36-AA-57

County of San Bernardino

TIM KELLY
Director

REAL PROPERTY DIVISION
WASTE MANAGEMENT
WASTE-TO-ENERGY MANAGEMENT

ENVIRONMENTAL PUBLIC WORKS AGENCY

ENGINEERING CONTRACT
SERVICES DEPARTMENT

825 East Third Street
San Bernardino, CA 92415-0834

May 6, 1986

File: CR 264/6

California Waste Management Board
1020 Ninth Street, Suite 300
Sacramento, California 95814

Attention: Ms. Cheryl Hisatomi
Inspector

Re: **LANDERS DISPOSAL SITE**
CORRECTIVE ACTIONS
Facility File 36-AA-57

Dear Ms. Hisatomi:

The following corrective actions have been taken to bring the Landers Disposal Site into compliance with State Minimum Standards:

Sections 17656, 17657, 17668

A new identification sign has been installed at the entry to the Landfill with the following information:

Name of Site; hours of operation; types of materials that will not be accepted; that no drinking water, sanitary facilities, or communications facilities are available; and that no public scavenging is allowed.

An additional sign is being prepared with the same information as the above sign and will be installed at the last access road to the Landfill.

Section 17666

Portable sanitary facilities are now in place at the Landfill for use by the equipment operators and caretakers.

Section 17670

Caretakers contract with the County, but are not County employees. The Caretakers will be responsible for providing their own safety vests and gloves under all new contracts.

Section 17711

Temporary help employees were contracted for during a three week period of time to police litter around the Landfill. County employees are policing the litter on a weekly basis. In addition, a new one-half mile long, twelve foot high fence, is being constructed on a four-foot high berm on the north side of the Landfill beyond the third fence. Hopefully the steps taken and planned to be taken will improve the litter problem; however, wind in the area will continue to cause a problem.

If you need any further information, please contact Mr. Mark Weinstein, Staff Analyst, at 714/387-2769.

Very truly yours,

D. Max Buchanan

D. MAX BUCHANAN P.E.
Solid Waste Operations Manager

DMB:MFW:des

cc: **Tim Kelly**
Mark Weinstein
Ron Stager

Working File

STATE OF CALIFORNIA

GEORGE DEUKMEJIAN, Governor

CALIFORNIA WASTE MANAGEMENT BOARD
[illegible] NINTH STREET, SUITE 300
[illegible]AMENTO, CA 95814

OCT 24 [illegible]

To: Charles Laird, Director
San Bernardino County Public Works
825 E. Third Street
San Bernardino, CA 92415

Subject: Report of inspection: Landers Disposal Site
36-AA-0057

Government Code Section 66796.38 requires the California Waste Management Board (Board) to conduct inspections of solid waste facilities for the purpose of evaluating compliance with the State Standards for Solid Waste Handling and Disposal (Title 14. California Administrative Code, Division 7 Chapter 3, commencing with section 17200). Under this program, each facility will be inspected at least three separate times. As you are probably aware, the subject facility received its second inspection on July 14, 1986. Enclosed please find the Evaluation Report resulting from this second inspection. Copies of photographs or slides referred to in the report are available from the Board upon written request.

The goal of our inspection program is to verify compliance with each of the State Minimum Standards, not merely to find violation(s) of these standards. In order to achieve this we will, as I stated above, be inspecting each facility at least three times. This will provide the following advantages over the previous inspection techniques:

* The program will provide greater fairness to operators of facilities by reducing the possibility that one operator will be inspected under adverse conditions and another under favorable conditions.

* The program will allow for evaluation of conditions, which show seasonal variations such as effectiveness of leachate control systems, vectors, dust, etc.

* The program will provide a track record of compliance which will be used in evaluating standards for which a single violation may not be sufficient reason to place the facility on the State List of Non-Complying Facilities when the facility is generally in compliance with that standard, i.e., the daily cover standard.

Although we do not intend to provide advance notice of the inspection dates to operators, the Local Enforcement Agency (LEA) will be notified of those dates, and will be invited to accompany our staff on the inspection.

If, after the third inspection, your facility continues to be operating in violation of one or more of the State Minimum Standards you will be notified of this finding by certified letter. A copy of that letter will be sent to the LEA. After 90 days or upon notification of correction of all violations(s), Board staff will reinspect the facility. If the facility is still in violation, staff will notify you and the LEA, by certified letter of staff's intent to recommend that the Board place the facility's name on the State List of Non-Complying Facilities at a regularly scheduled meeting of the Board. Should the Board place the facility on that list, State law (Government Code 66796.39) requires that the LEA develop a compliance schedule for correction of the violation(s). If compliance is not achieved within one year, Government Code section 66796.39 directs LEAs to revoke facility operating permits. If the facility is closed or abandoned, staff will recommend that the LEA issue a notice of violation and an order to correct the violations. That Notice and Order will also notify you or the owner of the facility that State law provides that "the unremedied condition of the facility is prima facie evidence of negligence, and in any action for damages against the owner of the property for injury caused by the unremedied condition, the burden of proving the injury was not caused by an unremedied condition shall be on the owner of the property".

If you have any questions regarding the program, please contact me at (916) 322-1769.

Sincerely,

John K. Bell

John K. Bell, Manager
Monitoring Section

Enclosure

cc: Jack Baker, County Environmental Health

mea

CALIFORNIA WASTE MANAGEMENT BOARD

DISPOSAL SITE
EVALUATION REPORT

Facility Name: LANDERS DISPOSAL SITE **Facility ID No.:** 36-AA-0057

Name of Inspector: Allen Freihofer **Inspection Dates:** 07-14-86

Inspector Signature: Allen Freihofer

CAC Section:	Observations:	Conclusions:
Disposal Site Information:		
17616 Report of Disposal Site Information	The RDSI addressed all the requirements of section 17616. However the RDSI states that the site receives 65 cubic yards of solid waste per day. The existing permit indicates that the site receives 14 tons per day of solid wastes. The operator told me that it now receives approximately 64 tons per day of solid waste. This is a significant increase in tonnage.	Indeterminate
Design Responsibility:		
17626 Design Responsibility	This standard applies to new facilities only. This is not a new facility.	N/A
17627 Ultimate Use	The ultimate use has been designated as open space or recreational.	Comply
17628 General Design Parameters	This site pre-exists the implementation of this standard.	N/A
17629 Public Health Design Parameters	I saw no evidence of the design failing to meet the criteria listed in section 17629.	Comply
17636 Weight/Volume Records	Records are kept for forecasting the rate of site filling and for planning purposes. I reviewed the records.	Comply

Section Manager JXB

Facility Name: LANDERS DISPOSAL SITE Facility ID No.: 36-AA-0057

Name of Inspector: Allen Freihofer Inspection Dates: 07-14-86

Inspector Signature: Allen Freihofer

CAC Section:	Observations:	Conclusions:
17637 Subsurface Records	I reviewed the subsurface records which were kept by the operator in the form of photographs and contour maps.	Comply
17638 Special Occurrences	A log of special occurrences is maintained in a file. I reviewed the log.	Comply
17639 Inspection of Records	Records were available during normal business hours. I reviewed the records.	Comply
Disposal Site Personnel:		
17646 Availability	I saw no evidence of site operations being impaired by a lack of personnel.	Comply
17647 Training	I saw no evidence of site operations being being impaired by a lack of training.	Comply
17648 Supervision	Ron Steiger, Operations Supervisor, was present.	Comply
17649 Site Attendant	An attendant was present.	Comply
Disposal Site Improvements:		
17656 Identification Signs	Identification signs were present. and included the operator's name.	Comply
17657 Entry Signs	Entry signs were present indicating fee schedule, hours of operation, and materials which are/are not accepted.	Comply

Facility Name: LANDERS DISPOSAL SITE Facility ID No.: 36-AA-0057

Name of Inspector: Allen Freihofer Inspection Dates: 07-14-86

Inspector Signature: Allen Freihofer

CAC Section:	Observations:	Conclusions:
17658 Site Security	No evidence of unauthorized site access was observed. The septic ponds were fenced and signed. The remote location and topography of the site acts to discourage unauthorized entry.	Comply
17659 Access Roads	Roads were smooth and allowed good site access. No dust or tracking problem was observed.	Comply
17660 Internal Roads	Internal roads were smooth and allowed good access to the unloading areas. Roads had directional signs.	Comply
Disposal Site Health and Safety:		
17666 Sanitary Facilities	Sanitary facilities were available near the working face. (An outhouse).	Comply
17667 Water Supply	Site personnel bring their own water in their trucks.	Comply
17668 Communications Facilities	The equipment operators had radios in their trucks. They could contact their office where a phone is located.	Comply
17669 Lighting	Site operations were not conducted during hours of darkness.	Comply
17670 Personnel Health And Safety	Supervisors had safety equipment and supplies that were available to employees. The LEA did not require that specific safety items be used.	Comply

Facility Name: LANDERS DISPOSAL SITE Facility ID No.: 36-AA-0057

Name of Inspector: Allen Freihofer Inspection Dates: 07-14-86

Inspector Signature: Allen Freihofer

CAC Section:	Observations:	Conclusions:
Disposal Site Operations:		
17676 Confined Unloading	The unloading area was confined to the length of the working face. (approximately 150 feet).	Comply
17677 Spreading and Compacting	I observed waste being spread and compacted in layers. The loose layer was approximately two feet before compaction.	Comply
17678 Slopes and Cuts	The slope of the working face allowed effective compaction by the dozer.	Comply
17679 Final Site Face	There were no final site faces. There is no final area yet, only intermediate, according to the operator.	N/A
17680 Stockpiling	Stockpiling did not interfere with other site activities. The stockpile was located just south of the active fill area.	Comply
17681 Availability of Cover	The supply of cover appeared great enough to provide for compliance with Section 17682 through the rainy season. Cover is obtained from hills on site.	Comply
17682 Cover	Daily cover was applied. This was verified by a check I made the following morning. (See slides 11-12,13,14,39,40,41)	Comply
17683 Performance Standards	The site uses daily cover rather than performance standards.	N/A

Facility Name: LANDERS DISPOSAL SITE | Facility ID No.: 36-AA-0057

Name of Inspector: Allen Freihofer | Inspection Dates: 07-14-86

Inspector Signature: Allen Freihofer

CAC Section:	Observations:	Conclusions:
17684 Intermediate Cover	Uncovered wastes were protruding from the soil in many places in the intermediate area to the right of the access road. (See slides II-23,24,25,26)	Violation
17685 Final Cover	The operator claims that there are no final areas yet, only intermediate areas.	N/A
17686 Scavenging	No scavenging was observed.	Comply
17687 Salvaging Permitted	Salvaging is permitted and occurred in a clearly defined, organized and controlled manner. Modean Osterhaut has exclusive contract as salvager. Five or six men work for her every day in shifts from 7 A.M. until 7 P.M.. They salvage, spot traffic, and act as site attendants.	Comply
17688 Volume Reduction and Energy Recovery	Volume reduction and energy recovery were not observed.	Comply
17689 Processing Area	Salvaging occurred in a clearly defined area just west of the active fill area.	Comply
17690 Storage of Salvage	Storage of salvage occurred in clearly defined areas and was not likely to cause a safety hazard or public nuisance.	Comply
17691 Removal	Salvage storage time did not seem excessive or likely to cause a health, safety, or fire hazard.	Comply

Facility Name: LANDERS DISPOSAL SITE Facility ID No.: 36-AA-0057

Name of Inspector: Allen Freihofer Inspection Dates: 07-14-86

Inspector Signature: Allen Freihofer

CAC Section:	Observations:	Conclusions:
17692 Non-Salvageable Items	No salvaging of non-salvageable items was observed.	Comply
Disposal Site Controls:		
17701 Nuisance Control	Site operations were not causing a public nuisance.	Comply
17702 Animal Feeding	No animals were observed feeding on waste.	Comply
17703 Fire Control	No fires or evidence of recent fires were observed. The Dept. of Forestry located 7 miles away responds to any large fires. If needed, they are contacted by radio.	Comply
17704 Leachate Control monitoring	No leachate was observed at this site. There is no leachate or groundwater monitoring program required at this site by the Regional Water Quality Control Board.	Comply
17705 Gas Control	The site is located in a remote desert area. There are no structures on site. I saw nothing to indicate presence of a gas problem here. Hence I did not feel it was necessary to use the gas meter to check for gas at this site.	Comply
17706 Dust Control	A water truck was present on site. The minor amount of dust observed was not causing a public nuisance.	Comply
17707 Vector and Bird Control	No vector problem or bird problem was observed.	Comply

Facility Name: LANDERS DISPOSAL SITE Facility ID No.: 36-AA-0057

Name of Inspector: Allen Freihofer Inspection Dates: 07-14-86

Inspector Signature: Allen Freihofer

CAC Section:	Observations:	Conclusions:
17708 Drainage and Erosion Control	Site contours and drainage ditches or channels control site drainage. No significant erosion damage was observed.	Comply
17709 Contact with Water	No wastes in contact with water were observed.	Comply
17710 Grading of Fill Surfaces	The intermediate area was very uneven with many low spots which would promote ponding of water. It needs additional cover and grading to prevent ponding. (See slides II-20,22,22a,23)	Violation
17711 Litter Control	No accumulations of litter likely to cause a public nuisance were observed.	Comply
17712 Noise Control	Noise levels did not seem likely to cause a public nuisance.	Comply
17713 Odor Control	Some odors were detected on site but would not cause a public nuisance because of the remote location of the site and the low intensity of the odors.	Comply
17714 Traffic Control	Traffic flow did not appear likely to cause a public safety hazard and I did not observe vehicles stacking onto public roads.	Comply
17715 Ponded Liquid	No evidence was seen of vector propagation in the septic ponds. There were no other liquid ponds on site.	Comply

Facility Name: LANDERS DISPOSAL SITE Facility ID No.: 36-AA-0057

Name of Inspector: Allen Freihofer Inspection Dates: 07-14-86

Inspector Signature: Allen Freihofer

CAC Section:	Observations:	Conclusions:
Disposal Site Equipment:		
17726 General	The scraper and dozer observed operating on site were able to properly operate the site.	Comply
17727 Standby Equipment	The County (operator) has standby equipment available at other sites.	Comply
Disposal Site Maintenance:		
17731 General	I saw no conditions indicating a lack of preventive maintenance.	Comply
17732 Operating Site Maintenance	Defective or deteriorated conditions were not observed.	Comply
17733 Insp. on Completion	The site has not closed.	N/A
17734 Completed Site Maintenance	The site has not closed.	N/A
17735 Recording	This site pre-exists the implementation of this standard and the site has not closed.	Comply
Disposal Site Special Wastes:		
17741 Burning Wastes	No burning wastes were observed. There was space available for spreading and extinguishing burning waste.	Comply
17742 Hazardous Wastes	No hazardous wastes were seen being received at this site. No evidence was seen to indicate that hazardous wastes are received at this site.	Comply

Facility Name: LANDERS DISPOSAL SITE Facility ID No.: 36-AA-0057

Name of Inspector: Allen Freihofer Inspection Dates: 07-14-86

Inspector Signature: Allen Freihofer

CAC Section:	Observations:	Conclusions:
17743 Liquid Wastes	Liquid waste was received and handled in a manner consistant with the RDSI and permit.	Comply
17744 Dead Animals	No dead animals were observed.	Comply
Disposal Site Reports and Reviews:		
17751 Periodic Site Review	The current permit was issued 06-07-79. A five year review was due 06-07-84, and has not been completed.	Violation

Notes:

-This site is located in a remote area in the Mojave Desert near the community of Landers. The weather was warm and the sky was clear and sunny.

-John Bell and I were met at the site by Laura Wallace of San Bernardino County Environmental Health Services (LEA) and by Ron Steiger and Max Buchanan of the San Bernardino County Public Works Department (operator).

SWIS-09 (REV. 1/88)

NOTICE OF INSPECTION DISPOSAL SITE

LOCAL ENFORCEMENT AGENCY: San Bernardino County Dept. of Environmental H

FACILITY FILE NUMBER (COUNTY LEA NUMBER)	PROGRAM CODE	INSPECTION DATE (1011) MM DD YY	T-OUT / T-IN	TOTAL TIME (DECIMAL HOURS) (1031)
36 - AA - 0057	P	07-14-86		2

FACILITY NAME: LANDERS DISPOSAL SITE

FACILITY LOCATION: Pioneer Rd. 1 Mile East of Avalon Avenue

INSPECTOR: Allen Freihofer

ALSO PRESENT: John Bell, Ron Steiger

RECEIVED BY:
Operator _____
Owner _____

Comments: The following violations were noted during this inspection:
17710 - Uneven surface on intermediate area must be graded to prevent ponding.
17654 - Many places in the intermediate area where wastes are poking through cover. One foot of compacted cover material must be applied over all wastes.
17751 - The 5 year review must be completed for this site.

	*V	C
(3011) RECORDS		☒
☐ ACCURATE WEIGHT/VOLUME RECORDS MAINTAINED 17636		
☐ ADEQUATE SUBSURFACE RECORDS MAINTAINED 17637		
☐ LOG OF SPECIAL OCCURRENCES MAINTAINED 17638		
☐ RECORDS AVAILABLE FOR INSPECTION 17639		
(3021) PERSONNEL		☒
☐ ADEQUATE NUMBER OF QUALIFIED PERSONNEL AVAILABLE 17646		
☐ PERSONNEL ADEQUATELY TRAINED 17647		
☐ ADEQUATE SUPERVISION PROVIDED 17648		
☐ SITE ATTENDANT AVAILABLE FULL-TIME OR AS DETERMINED BY LEA 17649		
(3031) SIGNS		☒
☐ IDENTIFICATION SIGNS AT EACH POINT OF ACCESS 17656		
☐ ENTRY SIGN STATES FEES, HOURS OF OPERATION, WASTES ACCEPTED/NOT ACCEPTED 17657		
☐ NON-HAZARDOUS UNATTENDED SITES HAVE SIGN WARNING USERS OF UNAVAILABILITY OF COMMUNICATION FACILITIES 17658		
(3041) SECURITY		☒
☐ ADEQUATE PERIMETER SECURITY, HAZARDOUS AREAS FENCED AND IDENTIFIED 17655		
(3051) ROADS		☒
☐ ACCESS ROADS HAVE SMOOTH SURFACE, MINIMIZE DUST AND TRACKING OF MUD, AND ALLOW ALL-WEATHER ACCESS 17659		
☐ INTERNAL ROADS IN SAFE CONDITION, PROVIDE ACCESS DURING INCLEMENT WEATHER, AND ARE PROVIDED WITH DIRECTIONS 17660		
(3071) SANITATION		☒
☐ ADEQUATE SANITARY FACILITIES AVAILABLE 17666		
☐ SAFE ADEQUATE DRINKING WATER AVAILABLE 17667		
(3081) COMMUNICATIONS		☒
☐ COMMUNICATION FACILITIES AVAILABLE WHERE HAZARDOUS WASTES ARE ACCEPTED 17668		
(3091) LIGHTING		☒
☐ LIGHTING ADEQUATE 17669		
(3101) SAFETY		☒
☐ SAFETY EQUIPMENT IN USE AND BEING WORN 17670		

	V	C
(3111) CONFINED UNLOADING		☒
☐ UNLOADING ADEQUATELY CONFINED 17675		
(3141) SPREADING/COMPACTING		☒
☐ SPREADING AND COMPACTION IN TWO-FOOT LAYERS 17677		
(3151) SLOPES/CUTS/GRADING	☒	
☐ WORKING FACE SLOPES ALLOW EFFECTIVE COMPACTION. DEPTH OF CUTS AND SLOPES OF TRENCH SIDES AS APPROVED BY LEA 17678		
☐ FINAL SLOPES HAVE NEAT APPEARANCE AND ARE 1-1/4 : 1 OR FLATTER 17679		
☒ GRADING OF FILL SURFACES ADEQUATE 17710		
(3161) COVER	☒	
☐ STOCKPILING OF COVER DOES NOT INTERFERE WITH OPERATIONS 17680		
☐ SUITABLE QUALITY AND SUPPLY OF COVER MATERIAL AVAILABLE 17681		
☐ COVER PROVIDED AT REQUIRED DEPTH AND FREQUENCY 17682		
☒ INTERMEDIATE COVER PROVIDED AT REQUIRED DEPTH AND FREQUENCY 17684		
☐ FINAL COVER PROVIDED AS REQUIRED 17685		
(3171) SALVAGING/PROCESSING		☒
☐ SCAVENGING PROHIBITED 17686		
☐ SALVAGING DOES NOT INTERFERE WITH OPERATIONS 17687		
☐ VOLUME REDUCTION AND ENERGY RECOVERY DO NOT INTERFERE WITH OPERATIONS OR CREATE HEALTH, SAFETY OR ENVIRONMENTAL PROBLEMS 17688		
☐ SALVAGING AND VOLUME REDUCTION CONFINED TO CLEARLY IDENTIFIED AREAS 17689		
☐ SALVAGE STORAGE LOCATION OK, VOLUME AS APPROVED BY LEA, MINIMIZES FIRE, NUISANCE 17690		
☐ SALVAGE STORAGE TIME DOES NOT RESULT IN HEALTH OR FIRE PROBLEMS 17691		
☐ SALVAGED MATERIALS APPROVED BY LEA AND LOCAL HEALTH 17692		
(3181) NUISANCE		☒
☐ OPERATIONS DO NOT CREATE A PUBLIC NUISANCE 17701		
☐ FEEDING OF REFUSE TO ANIMALS FOR HUMAN CONSUMPTION PROHIBITED 17702		

	V	C
(3191) FIRE		☒
☐ FIRE CONTROL ADEQUATE 17703		
(3192) FIRE (P) N/A		
☐ BURNING MATERIALS SPREAD AND EXTINGUISHED. LEA, SWRB NOTIFIED IMMEDIATELY OF FIRE NOT EXTINGUISHED IN 24 HOURS 17693		
(3201) LEACHATE N/A		☒
☐ ADEQUATE STEPS TAKEN TO MONITOR, COLLECT, TREAT, AND DISPOSE OF LEACHATES 17704		
☐ NO WASTES IN DIRECT CONTACT WITH WATER EXCEPT AS APPROVED BY RWQCB 17705		
(3202) LEACHATE (P) N/A		
☐ REFUSE COVERED WITH NEXT DAY'S REFUSE OR WITH SIX INCHES OF COMPACTED SOIL. TOTAL AREA OF EXPOSED REFUSE IS AS SPECIFIED FOR WET AND DRY SEASONS 17693		
(3211) GAS		☒
☐ GAS MONITORING AND CONTROL AS REQUIRED 17709		
(3221) DUST		☒
☐ DUST CONTROL ADEQUATE 17706		
(3231) VECTORS/BIRDS		☒
☐ VECTOR AND BIRD CONTROL ADEQUATE 17707		
☐ LIQUID PONDS MINIMIZE VECTOR PROPAGATION 17713		
(3232) VECTORS (P) N/A		
☐ THRESHOLD VALUES FOR VECTOR POPULATIONS NOT EXCEEDED 17693		
(3241) DRAINAGE/EROSION		☒
☐ DRAINAGE AND EROSION CONTROL ADEQUATE 17708		
(3251) LITTER		☒
☐ LITTER CONTROL ADEQUATE 17711		
(3252) LITTER (P) N/A		
☐ LITTER NOT ALLOWED TO MIGRATE OFF-SITE 17693		
(3261) NOISE		☒
☐ NOISE CONTROL ADEQUATE 17712		
(3271) ODOR		☒
☐ ODOR CONTROL ADEQUATE 17713		
(3272) ODOR (P) N/A		
☐ AMBIENT AIR AT OR BEYOND FACILITY BOUNDARY IS NOT ODOROUS 17693		

	V	C
(3281) TRAFFIC		☒
☐ TRAFFIC CONTROL ADEQUATE WITHIN SITE. TRAFFIC MINIMIZES INTERFERENCE, SAFETY PROBLEMS, AND STACKING ON PUBLIC ROADS 17714		
(3291) EQUIPMENT		☒
☐ EQUIPMENT ADEQUATE IN TYPE, CAPACITY, AND NUMBER, AND IS ADEQUATELY MAINTAINED 17726		
☐ STANDBY EQUIPMENT AVAILABLE TO COMPLY WITH SEC. 17682 AND OTHER SECTIONS 17727		
(3301) MAINTENANCE		☒
☐ EFFECTIVE MAINTENANCE PROCEDURES AND PROGRAMS DEVELOPED AND UTILIZED 17731		
☐ ADEQUATE MONITORING AND REPAIR OF DETERIORATED CONDITIONS 17732		
(3311) CLOSURE N/A		
☐ AFTER CLOSURE, IF LEACHATE, EXTENSIVE SURFACE CRACKING OR SETTLEMENT OCCURS, THE OWNER SHALL NOTIFY LEA AND SHALL MONITOR AND REPAIR SITE FOR A PERIOD OF 5 YEARS OR LONGER 17734		
☐ UPON SITE CLOSURE, DETAILED DESCRIPTION MUST BE FILED WITH THE LEA AND WITH THE COUNTY RECORDER 17735		
(3321) SPECIAL WASTES		☒
☐ BURNING WASTES IMMEDIATELY SPREAD AND EXTINGUISHED IN SAFE AREA 17741		
☐ SITE ACCEPTS ONLY APPROVED HAZARDOUS WASTES AND TAKES PRECAUTIONS TO ELIMINATE OR CONTROL HARMFUL DUSTS, FUMES, MISTS, VAPORS, OR GASES 17742		
☐ LIQUID WASTES APPROVED BY RWQCB, LOCAL HEALTH ENTITY AND LEA 17743		
☐ DEAD ANIMALS ALLOWED BY LOCAL REGULATIONS 17744		
(3331) OTHER	☒	
☒ 17751 - The 5 year review must be completed.		

*V = Violation
C = Compliance

203

STATE OF CALIFORNIA GEORGE DEUKMEJIAN, Governor

CALIFORNIA WASTE MANAGEMENT BOARD
1020 NINTH STREET, SUITE 300
SACRAMENTO, CA 95814

FEB 19 1987

To: Charles Laird, Director
San Bernardino County Public Works
825 E. Third Street
San Bernardino, CA 92415

Subject: Report of Inspection: Landers Disposal Site 36-AA-57

Government Code Section 66796.38 requires the California Waste Management Board (Board) to conduct inspections of solid waste facilities for the purpose of evaluating compliance with the State Standards for Solid Waste Handling and Disposal (Title 14. California Administrative Code, Division 7 Chapter 3, commencing with section 17200). Under this program, each facility will be inspected at least three separate times. As you are probably aware, the subject facility received its third inspection on December 15, 1986. Enclosed please find the Evaluation Report resulting from this third inspection. Copies of photographs or slides referred to in the report are available from the Board upon written request.

Results of the three field inspections along with all pertinent supporting data in our files have now undergone staff review. A final staff report is currently being prepared and will be sent to you as soon as possible. We are concerned with the following repeated and/or uncorrected violations of State Minimum Standards:

17710 - Grading of Fill Surfaces (Repeated
17751 - Periodic Site Review (Repeated)

At the March meeting of the California Waste Management Board tentatively scheduled for March 26-27, 1987, staff will report on its evaluation of the subject facility. Staff will recommend that the Board direct you to take specific corrective actions to gain compliance with State Minimum Standards. If the Board accepts this recommendation, you will be directed to submit a letter to the Board within 30 days stating specific dates for initiating and completing the corrective actions.

If this letter is not received by the Board within 30 days, or if the dates for implementing the required actions are not met, progress towards compliance will be deemed unsatisfactory. Verification of all deadlines will be made through additional staff inspections as necessary. If at any time progress is deemed unsatisfactory, a 90 day notice will be issued by the Chief Executive Officer stating the Board's intent to place the site on the State List of Non-Complying Facilities.

You should be aware that the Board may direct staff to issue a 90 day notice of it's intent to list the site rather than allow for additional time for compliance as recommended by staff.

You are invited to address the Board with any information you feel the Board should consider at it's March meeting. A notice of the meeting will be sent at least 10 days prior to the scheduled date.

A copy of this letter and the enclosed report will be sent to the LEAs. If you have any questions regarding this program, please contact me at (916) 322-1769

Sincerely,

John K. Bell

John K. Bell, Manager
Monitoring Section

Enclosure

cc: Richard L. Roberts, Department of Environmental Health

mea

CALIFORNIA WASTE MANAGEMENT BOARD

SOLID WASTE FACILITY
EVALUATION REPORT

Facility Name: Landers Disposal Site Facility ID No.: 36-AA-57

Name of Inspector: Herbert Berton Inspection Dates: 12/15/86

Signature: Herbert Berton

LEGEND

C = Compliance V = Violation
I = Indeterminate N = Not Applicable

CAC	SECTION	OBSERVATIONS	RESULT
		DISPOSAL SITE INFORMATION	
17616	Report of Disposal Site Information.	The current RDSI fully describes the existing operation. Note: The site received an average of 105.3 cubic yards per day of waste as compared to 65 cubic yards of waste per day reported in the RDSI.	C
		DESIGN RESPONSIBILITY.	
17626	Design Responsibility	This standard applies to new facilities only.	N
17627	Ultimate Use.	The ultimate use has been designated as open space or recreational.	C
17628	General Design Parameters.	The site design accounted for all factors in Section 17629.	C

Section Manager

CAC	SECTION	OBSERVATIONS	RESULT
17629	Public Health Design Parameters	The design meets the criteria listed in Section 17629.	C
		DISPOSAL SITE RECORDS.	
17636	Weight/Volume Records.	I reviewed the weight/volume records which are yearly estimates taken from aerial photographs documenting the change in height of the site. The estimated volume for June 29, 1985 to August 23, 1986 (420 calendar days) was 105.3 cubic yards per day.	C
17637	Subsurface Records.	I reviewed the subsurface records which were kept by the operator in the form of photographs and contour maps. The subsurface records were kept at the Public Works Agency in San Bernardino.	C
17638	Special Occurrences.	I reviewed the log of special occurrences which is kept at the Public Works Agency in San Bernardino.	C
17639	Inspection of Records.	I reviewed all records which were available during normal business hours. All records were kept in the Public Works Agency office in San Bernardino.	C
		DISPOSAL SITE PERSONNEL.	
17646	Availability.	The site had two qualified persons to properly operate the facility.	C
17647	Training.	I saw no evidence of site operations being impaired by lack of training.	C
17648	Supervision.	Conrad Mansir is operations supervisor. I did not observe any conditions I felt were due to a lack of supervision.	C

Inspector: Herbert Barton

CAC	SECTION	OBSERVATIONS	RESULT
17649	Site Attendant.	The site was attended during operating hours.	C
		DISPOSAL SITE IMPROVEMENTS.	
17656	I.D. Signs.	Identification signs were present and contained the required information.	C
17657	Entry Signs.	Entry signs were present and stated fees, hours of operation, and types of materials which are/are not accepted. (See photo III-1, III-2).	C
17658	Site Security.	The septic ponds were fenced and signed. Parts of the site were fenced. Areas that were not fenced had geographical barriers which discouraged unauthorized entry. (See photo III-2, III-3, III-4).	C
17659	Access Roads.	Roads were smooth and passable and allowed good access to the site. I did not see excessive dust or tracking of material onto adjacent paved public roads.	C
17660	Internal Roads.	Internal roads were passable and in such a condition that vehicle access and unloading were not impeded. Roads were suitably signed. (See photo III-2, III-5).	C
		DISPOSAL SITE HEALTH AND SAFETY.	
17666	Sanitary Facilities.	Two porta-potties were available for use east of the internal road. (See photo III-6).	C
17667	Water Supply.	Site personnel supply their own drinking water in their trucks.	C
17668	Communication Facilities.	The equipment operators had two-way radios in their trucks where they could contact their office or emergency personnel.	C

Inspector: Herbert Benton

CAC	SECTION	OBSERVATIONS	RESULT
17669	Lighting.	This site did not operate during hours of darkness.	C
17670	Personnel Health and Safety.	Safety equipment and supplies were available to employees. The LEA did not require that specific safety items be used.	C
		DISPOSAL SITE OPERATIONS.	
17676	Confined Unloading.	Waste was confined to an area approximately 200 feet long, as measured by rangefinder.	C
17677	Spreading and Compacting.	Waste was properly spread and compacted by a caterpiller. (See photo III-7).	C
17678	Slopes and Cuts.	The slope of the working face was such that effective compaction of waste was maintained. The measured angle, by clinometer, was 15 degrees which is equal to a ratio of 3.73:1, horizontal to vertical.	C
17679	Final Site Face.	There were no final site faces.	C
17680	Stockpiling.	Stockpiles, located immediately north and south of the active face, did not hinder operations.	C
17681	Availability of Cover.	Cover material is obtained from hills on site and, in my opinion, was of such an amount that material would be available for the life of the site.	C
17682	Cover.	Waste was being covered at the required daily frequency. Photographs taken in the morning and at the end of cover operations document this. See Photo III-10, III-11) .	C
17683	Performance Standards.	This is not a performance standard site.	N

Inspector: Herbert Bintein

CAC	SECTION	OBSERVATIONS	RESULT
17684	Intermediate Cover.	According to Laura Wallace (LEA), most of the site is in a state of intermediate cover. I did not observe any exposed waste in intermediate cover areas.	C
17685	Final Cover.	According to Laura Wallace (LEA), there were no areas of final cover.	C
17686	Scavenging.	I did not observe any scavenging.	C
17687	Salvaging Permitted.	Salvaging is permitted and occurred in a clearly defined, organized and controlled manner. Modean Osterhaut is the contract salvager and has five or six employees working for her everyday in shifts from 7 A.M. to 7 P.M. They also spot traffic and act as site attendants. Types of material salvaged include aluminum cans, books, toys, etc.	C
17688	Volume Reduction and Energy Recovery.	Volume reduction and energy recovery were not observed.	C
17689	Processing Area.	Salvaging occurred in a clearly defined area immediately east of the active face.	C
17690	Storage of Salvage.	Storage of salvage occurred in clearly defined areas and was not likely to cause a safety hazard or public nuisance.	C
17691	Removal.	Salvage storage time did not seem excessive or likely to cause a safety or fire hazard or public nuisance.	C
17692	Non-Salvageable Items.	I did not observe the salvage of any items defined as non-salvageable by this section.	C

Inspector: Herbert Benton

CAC	SECTION	OBSERVATIONS	RESULT
		DISPOSAL SITE CONTROLS	
17701	Nuisance Control.	The operation did not appear to cause a public nuisance.	C
17702	Animal Feeding.	I did not observe animals feeding on waste.	C
17703	Fire Control.	I did not observe any fires or see evidence of recent fires. The Department of Forestry, located seven miles away, responds to any large fires.	C
17704	Leachate Control.	I observed no leachate at this site. There is no leachate or groundwater monitoring program required at this site by the Regional Water Quality Control Board.	C
17705	Gas Control.	Due to the isolated nature of the site, I had no cause to believe that landfill gas would be a problem.	C
17706	Dust Control.	I did not observe any conditions which could lead to a dust problem. A water truck is available from the Department of Public Works should a dust problem arise.	C
17707	Vector and Bird Control.	I did not observe any vectors on site.	C
17708	Drainage and Erosion Control.	I did not observe improper drainage control or inadequate erosion control. (See photo III-13).	C
17709	Contact with Water.	I observed no waste in contact with water.	C
17710	Grading of Fill Surfaces.	There were two areas of intermediate cover which needed to be regraded to prevent ponding of water. One area is located west of the access road, the other area is located southeast of the access road. (See photo III-12).	V

Inspector: Herbert Barton

CAC	SECTION	OBSERVATIONS	RESULT
17711	Litter Control.	No accumulations of litter likely to cause a public nuisance were observed.	C
17712	Noise Control.	Due to the isolated nature of this site I did not observe any condition which I felt could lead to a noise nuisance.	C
17713	Odor Control.	Slight odors were detected on site but not at the site perimeter.	C
17714	Traffic Control.	Traffic flow did not cause a public safety hazard and I did not observe vehicles stacking onto public roads.	C
17715	Ponded Liquid.	I observed no evidence of vector propagation in the septic ponds.	C
		DISPOSAL SITE EQUIPMENT.	
17726	General.	The numbers and types of equipment on site were consistant with requirements listed in the RDSI. Equipment on site consisted of two bulldozers. The scraper was on rotation at another disposal site.	C
17727	Standby Equipment.	The operator has standby equipment available at other disposal sites throughout the county.	C
		DISPOSAL SITE MAINTENANCE.	
17731	General.	Equipment and facility maintenance programs meet the requirements of Section 17731.	C
17732	Operating Site Maintenance.	As there were fewer than three maintenance related sections in violation, this site complies with Section 17732.	C
17733	Inspection on Completion.	This is not a closed site.	N
17734	Completed Site Maintenance.	This is not a closed site.	N

Inspector: Herbert Benton

CAC	SECTION	OBSERVATIONS	RESULT
17735	Recording.	This site pre-exists the implementation of this standard and has not closed.	N
		DISPOSAL SITE SPECIAL WASTES.	
17741	Burning Wastes.	I did not observe any burning waste at this site.	C
17742	Hazardous Wastes.	I did not observe any hazardous waste at this site.	C
17743	Liquid Wastes.	Liquid waste was received and appeared to be handled in a manner consistant with the RDSI and permit.	C
17744	Dead Animals.	I did not observe any dead animals at this site.	C
		DISPOSAL SITE REPORTS AND REVIEWS.	
17751	Periodic Site Review.	The site is overdue for a periodic site review which was due on 6/7/84.	V

NOTES

Inspector: Herbert Benton

SWIS-09 (REV. 1/85)

NOTICE OF INSPECTION DISPOSAL SITE

LOCAL ENFORCEMENT AGENCY: _____

FACILITY FILE NUMBER (COUNTY, LEA NUMBER)	PROGRAM CODE	INSPECTION DATE (MM DD YY)	T-OUT / T-IN	TOTAL TIME (DECIMAL HOURS)
36 - AA - 57	P	(1011) 12/15/86		(1031)

FACILITY NAME: Landers Disposal Site

FACILITY LOCATION:

INSPECTOR: H. Berton

ALSO PRESENT: B. Burnell

RECEIVED BY:
Operator _____
Owner _____

Comments: See Enclosed Evaluation Report

	*V	C
(3011) RECORDS		☒
☐ ACCURATE WEIGHT/VOLUME RECORDS MAINTAINED 17636		
☐ ADEQUATE SUBSURFACE RECORDS MAINTAINED 17637		
☐ LOG OF SPECIAL OCCURRENCES MAINTAINED 17638		
☐ RECORDS AVAILABLE FOR INSPECTION 17639		
(3021) PERSONNEL		☒
☐ ADEQUATE NUMBER OF QUALIFIED PERSONNEL AVAILABLE 17646		
☐ PERSONNEL ADEQUATELY TRAINED 17647		
☐ ADEQUATE SUPERVISION PROVIDED 17648		
☐ SITE ATTENDANT AVAILABLE FULL-TIME OR AS DETERMINED BY LEA 17649		
(3031) SIGNS		☒
☐ IDENTIFICATION SIGNS AT EACH POINT OF ACCESS 17656		
☐ ENTRY SIGN STATES FEES, HOURS OF OPERATION, WASTES ACCEPTED/NOT ACCEPTED 17657		
☐ NON-HAZARDOUS UNATTENDED SITES HAVE SIGN WARNING USERS OF UNAVAILABILITY OF COMMUNICATION FACILITIES 17658		
(3041) SECURITY		☒
☐ ADEQUATE PERIMETER SECURITY, HAZARDOUS AREAS FENCED AND IDENTIFIED 17659		
(3051) ROADS		☒
☐ ACCESS ROADS HAVE SMOOTH SURFACE, MINIMIZE DUST AND TRACKING OF MUD, AND ALLOW ALL-WEATHER ACCESS 17659		
☐ INTERNAL ROADS IN SAFE CONDITION, PROVIDE ACCESS DURING INCLEMENT WEATHER, AND ARE PROVIDED WITH DIRECTIONS 17660		
(3071) SANITATION		☒
☐ ADEQUATE SANITARY FACILITIES AVAILABLE 17666		
☐ SAFE ADEQUATE DRINKING WATER AVAILABLE 17667		
(3081) COMMUNICATIONS		☒
☐ COMMUNICATION FACILITIES AVAILABLE WHERE HAZARDOUS WASTES ARE ACCEPTED 17668		
(3091) LIGHTING		☒
☐ LIGHTING ADEQUATE 17669		
(3101) SAFETY		☒
☐ SAFETY EQUIPMENT IN USE AND BEING WORN 17670		

	V	C
(3111) CONFINED UNLOADING		☒
☐ UNLOADING ADEQUATELY CONFINED 17675		
(3141) SPREADING/COMPACTING		☒
☐ SPREADING AND COMPACTION IN TWO-FOOT LAYERS 17677		
(3151) SLOPES/CUTS/GRADING	☒	
☐ WORKING FACE SLOPES ALLOW EFFECTIVE COMPACTION. DEPTH OF CUTS AND SLOPES OF TRENCH SIDES AS APPROVED BY LEA 17678		
☐ FINAL SLOPES HAVE NEAT APPEARANCE AND ARE 1-3/4 : 1 OR FLATTER 17679		
☒ GRADING OF FILL SURFACES ADEQUATE 17710		
(3161) COVER		☒
☐ STOCKPILING OF COVER DOES NOT INTERFERE WITH OPERATIONS 17680		
☐ SUITABLE QUALITY AND SUPPLY OF COVER MATERIAL AVAILABLE 17681		
☐ COVER PROVIDED AT REQUIRED DEPTH AND FREQUENCY 17682		
☐ INTERMEDIATE COVER PROVIDED AT REQUIRED DEPTH AND FREQUENCY 17684		
☐ FINAL COVER PROVIDED AS REQUIRED 17688		
(3171) SALVAGING/PROCESSING		☒
☐ SCAVENGING PROHIBITED 17686		
☐ SALVAGING DOES NOT INTERFERE WITH OPERATIONS 17687		
☐ VOLUME REDUCTION AND ENERGY RECOVERY DO NOT INTERFERE WITH OPERATIONS OR CREATE HEALTH, SAFETY OR ENVIRONMENTAL PROBLEMS 17688		
☐ SALVAGING AND VOLUME REDUCTION CONFINED TO CLEARLY IDENTIFIED AREAS 17689		
☐ SALVAGE STORAGE LOCATION OK, VOLUME AS APPROVED BY LEA, MINIMIZES FIRE, NUISANCE 17690		
☐ SALVAGE STORAGE TIME DOES NOT RESULT IN HEALTH OR FIRE PROBLEMS 17691		
☐ SALVAGED MATERIALS APPROVED BY LEA AND LOCAL HEALTH 17692		
(3181) NUISANCE		☒
☐ OPERATIONS DO NOT CREATE A PUBLIC NUISANCE 17701		
☐ FEEDING OF REFUSE TO ANIMALS FOR HUMAN CONSUMPTION PROHIBITED 17702		

	V	C
(3191) FIRE		☒
☐ FIRE CONTROL ADEQUATE 17703		
(3192) FIRE (P)		
☐ BURNING MATERIALS SPREAD AND EXTINGUISHED. LEA, SWMB NOTIFIED IMMEDIATELY OF FIRE NOT EXTINGUISHED IN 24 HOURS 17683 N/A		
(3201) LEACHATE		☒
☐ ADEQUATE STEPS TAKEN TO MONITOR, COLLECT, TREAT, AND DISPOSE OF LEACHATES 17704		
☐ NO WASTES IN DIRECT CONTACT WITH WATER EXCEPT AS APPROVED BY RWQCB 17709		
(3202) LEACHATE (P) N/A		
☐ REFUSE COVERED WITH NEXT DAY'S REFUSE OR WITH SIX INCHES OF COMPACTED SOIL. TOTAL AREA OF EXPOSED REFUSE IS AS SPECIFIED FOR WET AND DRY SEASONS 17683		
(3211) GAS		☒
☐ GAS MONITORING AND CONTROL AS REQUIRED 17705		
(3221) DUST		☒
☐ DUST CONTROL ADEQUATE 17706		
(3231) VECTORS/BIRDS		☒
☐ VECTOR AND BIRD CONTROL ADEQUATE 17707		
☐ LIQUID PONDS MINIMIZE VECTOR PROPAGATION 17715		
(3232) VECTORS (P) N/A		
☐ THRESHOLD VALUES FOR VECTOR POPULATIONS NOT EXCEEDED 17683		
(3241) DRAINAGE/EROSION		☒
☐ DRAINAGE AND EROSION CONTROL ADEQUATE 17708		
(3251) LITTER		☒
☐ LITTER CONTROL ADEQUATE 17711		
(3252) LITTER (P) N/A		
☐ LITTER NOT ALLOWED TO MIGRATE OFF-SITE 17683		
(3261) NOISE		☒
☐ NOISE CONTROL ADEQUATE 17712		
(3271) ODOR		☒
☐ ODOR CONTROL ADEQUATE 17713		
(3272) ODOR (P)		
☐ AMBIENT AIR AT OR BEYOND FACILITY BOUNDARY IS NOT ODOROUS 17683 N/A		

	V	C
(3281) TRAFFIC		☒
☐ TRAFFIC CONTROL ADEQUATE WITHIN SITE. TRAFFIC MINIMIZES INTERFERENCE, SAFETY PROBLEMS, AND STACKING ON PUBLIC ROADS 17714		
(3291) EQUIPMENT		☒
☐ EQUIPMENT ADEQUATE IN TYPE, CAPACITY, AND NUMBER, AND IS ADEQUATELY MAINTAINED 17726		
☐ STANDBY EQUIPMENT AVAILABLE TO COMPLY WITH SEC. 17682 AND OTHER SECTIONS 17727		
(3301) MAINTENANCE		☒
☐ EFFECTIVE MAINTENANCE PROCEDURES AND PROGRAMS DEVELOPED AND UTILIZED 17731		
☐ ADEQUATE MONITORING AND REPAIR OF DETERIORATED CONDITIONS 17732		
(3311) CLOSURE		
☐ AFTER CLOSURE, IF LEACHATE, EXTENSIVE SURFACE CRACKING OR SETTLEMENT OCCURS, THE OWNER SHALL NOTIFY LEA AND SHALL MONITOR AND REPAIR SITE FOR A PERIOD OF 5 YEARS OR LONGER 17734 N/A		
☐ UPON SITE CLOSURE, DETAILED DESCRIPTION MUST BE FILED WITH THE LEA AND WITH THE COUNTY RECORDER 17735		
(3321) SPECIAL WASTES		☒
☐ BURNING WASTES IMMEDIATELY SPREAD AND EXTINGUISHED IN SAFE AREA 17741		
☐ SITE ACCEPTS ONLY APPROVED HAZARDOUS WASTES AND TAKES PRECAUTIONS TO ELIMINATE OR CONTROL HARMFUL DUSTS, FUMES, MISTS, VAPORS, OR GASES 17742		
☐ LIQUID WASTES APPROVED BY RWQCB, LOCAL HEALTH ENTITY AND LEA 17743		
☐ DEAD ANIMALS ALLOWED BY LOCAL REGULATIONS 17744		
(3331) OTHER	☒	
☐ 17751 - Periodic Site Review		

*V = Violation
C = Compliance

DISTRIBUTION: WHITE — CWMB YELLOW — OPERATOR PINK — LEA

CALIFORNIA WASTE MANAGEMENT BOARD

Agenda Item #11-B

March 26-27, 1987

Item:

Consideration of notifying the operator of the Norwalk Disposal Site (Los Angeles County) of the Board's intent to include that facility on the State List of Non-Complying Facilities as required by Government Code Section 66796.38.

Key Issues:

- An evaluation of all available data regarding the compliance of Norwalk Disposal Site with State Minimum Standards has recently been completed.
- The evaluation included three inspections of the facility by California Waste Management Board (CWMB) staff.
- Repeated violations of the following sections have been documented:

  17710 - Grading of Fill Surfaces
  17735 - Recording

- Staff recommends that the site operator be directed to establish a compliance schedule within 30 days. The Chief Executive Officer would be authorized to issue a 90-day notice of the Board's intent to place the site on the State List of Non-Complying Facilities if the adopted compliance schedule is not met.

Site Information:

Name:	Norwalk Disposal Site
SWIS #:	19-AI-01
Facility Type:	Class III (new classification)
Operational Status:	Closed
Location:	Sante Fe Springs, CA (L.A. Co.)
Setting:	Manufacturing (North, South, East, West).
Permitted Volume:	15 TPD
In Place Tonnage:	Approximately 8100 tons (permitted acreage)
Permitted Acreage:	1.8 acres
Facility Owner:	Charles Pratty
Facility Operator:	Charles Pratty
Facility Operator:	Santa Fe Springs Dept. of Public Works

Inspection Summary:

CAC Section	1st. Inspec. 11/20-22/85	2nd Inspec. 7/16/86	3rd Inspec. 12/16/86
17710 Grading of Fill Surfaces	Comply	Violation	Violation
17735 Recording	Comply	Violation	Violation

Background:

Norwalk Disposal Site was a 1.8 acre Class II-2 (old classification) landfill which was permitted to accept 15 tons of waste per day. The facility began operations prior to July, 1954 and received a Solid Waste Facilities Permit on February 23, 1979. According to the permit, the life expectancy of the site was 6.5 years. The site stopped landfilling sometime in 1982.

Types of waste received at this site included:

a) Solid fill
b) Garden refuse
c) Mixed demolition waste
d) Bulky items (water heaters, furniture, etc.)
e) Commercial refuse

Types of waste not permitted at the site were:

a) Hazardous and infectious waste
b) Liquid waste and garbage

Land surrounding the site is zoned Manufacturing (M-2, North, South, East, West). Currently there is an auto dismantling business and a permitted transfer station on top of the landfill.

The Local Enforcement Agency duties are jointly shared by the Santa Fe Springs Department of Public Works and the Los Angeles County Health Department.

Norwalk Disposal Site was included in the Presley inspection inventory pursuant to Government Code Section 66796.38 which authorizes the Board to investigate closed facilities to insure that public health and safety and the environment are adequately protected.

Related Issues:

The facility has a #1 Ranking under the Calderon Program. A draft SWAT proposal has been submitted by the operator to the Regional Water Quality Control Board. However, according to Quang Nguyen, Area Engineer for the Regional Water Quality Control Board, the report is very sketchy and in all likelihood will be rejected. In addition, Mr. Nguyen stated that the facility's waste discharge requirements must be revised and that continued groundwater monitoring will be required.

Past Compliance:

For the period between November 11, 1984 and January 30, 1985, three inspections by the Local Enforcement Agency were conducted. There were no violations noted for any of these inspections.

Recent Compliance:

During the California Waste Management Board evaluation period for Norwalk Disposal Site (November 20, 1985 to December 16, 1986) there were no inspections reported by the Local Enforcement Agency.

A chronology of events occurring during the Presley evaluation period is presented below:

November 20, 1985

The first of three inspections by the California Waste Management Board was conducted by Cheryl Hisatomi. Sections in violation are as follows:

17638 - Special Occurrences
17648 - Supervision
17657 - Entry Signs
17682 - Cover
17686 - Scavenging
17690 - Storage of Salvage
17711 - Litter Control

February 12, 1986

Results of the first inspection were transmitted to the operator and the LEA. The cover letter advised the operator of the nature of the evaluation program and the consequences of non-compliance (Attachment #1).

July 16, 1986

The second Presley inspection was conducted by Allen Freihofer. Sections in violation are as follows:

17616 - RDSI
17710 - Grading of Fill Surfaces
17735 - Recording

All other applicable sections were in compliance.

October 24, 1986

Results of the second Presley inspection were transmitted to the operator and the LEA. The cover letter again advised the operator of the nature of our evaluation program and the consequences of non-compliance (Attachment #2).

December 16, 1986

The third Presley inspection was conducted by Herbert Berton. Sections in violation are as follows:

17710 - Grading of Fill Surfaces
17735 - Recording

All other applicable sections were in compliance.

February 19, 1987

Results of the third inspection were transmitted to the operator and the LEA. The cover letter reiterated the nature of our evaluation program. It also informed the operator and LEA of staff's intent to have the Board consider placing Norwalk Disposal Site on the State List of Non-Complying Facilities at its March meeting unless corrective measures are taken (Attachment #3).

Summary:

The Norwalk Disposal Site has been evaluated by the California Waste Management Board for compliance with State Minimum Standards. All pertinent information including data gathered during three inspections conducted since November of 1985 has been reviewed. Ongoing violations of the following sections have been documented:

17710 - Grading of Fill Surfaces 17735 - Recording

The Local Enforcement Agency agrees with Board staff inspection results and with the Board action being sought.

Board Options:

Option #1

Direct the operator to establish a schedule for bringing the site into compliance with State Minimum Standards.

Under this option, the operator must submit a compliance schedule to the Board within 30 days stating specific dates for initiating and completing the required actions outlined below. If an agreeable schedule is not received by the Board within 30 days, and/or if dates specified for implementing and completing the required actions are not met, this option authorizes the Chief Executive Officer to issue a 90 day notice of the Board's intent to place the site on the State List of Non-Complying Facilities.

Specified Actions:

17710 (Grading of Fill Surfaces)

1) Establish and begin implementation of a work plan designed to correct subsidence problems at the facility. This work plan should include the filling and regrading of problem areas so as to promote the complete lateral runoff of precipitation from the top of the landfill.

17735 (Recording)

1) File a detailed description of the site, including a map, with Recorder of the County, Enforcement Agency, and with the local agency that has been selected to maintain the County Solid Waste Management Plan.

Option #2

Notify the operator of the Board's intent to place Norwalk Disposal Site on the State List of Non-Complying Facilities unless the following action is taken within 90 days of notice:

The operator must develop a compliance schedule that is mutually agreed upon by the Board and the Local Enforcement Agency for completion of the required actions outlined in Option #1. Failure to meet any deadline contained in the compliance schedule will result in a recommendation by staff that the Board place the site on the State List of Non-Complying Facilities. In no case will such a recommendation be made in less that 90 days. Verification of all deadlines will be made through additional staff inspection as necessary.

Option #3

No Action.

Notification:

The operator and LEA have been invited to present to the Board at its March meeting any information relevent to the matter under consideration.

Recommendation:

Based on the information available to staff at the time of the report, staff recommends that the Board implement Option #1.

Norwalk Disposal Site

Attachments

#1 1st CWMB inspection report, February 12, 1986.

#2 2nd CWMB inspection report, October 24, 1986.

#3 3rd CWMB inspection report, February 19, 1987.

Cheryl

STATE OF CALIFORNIA GEORGE DEUKMEJIAN, Governor

CALIFORNIA WASTE MANAGEMENT BOARD
0 NINTH STREET, SUITE 300
SACRAMENTO, CA 95814

Date: February 12, 1986

To: Charles Pratty, President
Norwalk Dump Company
13780 E. Imperial Highway
Sante Fe Springs, Ca. 90670

Subject: Report of inspection: Norwalk Dump Company
19-AI-01

Government Code Section 66796.38 requires the California Waste Management Board (Board) to conduct inspections of solid waste facilities for the purpose of evaluating compliance with the State Standards for Solid Waste Handling and Disposal (Title 14. California Administrative Code, Division 7 Chapter 3, commencing with section 17200). Under this program, each facility will be inspected at least three separate times. As you are aware by now, staff has already conducted one of these inspections at the subject facility. The date of that inspection was November 20 and 22, 1985. A copy of that inspection report is enclosed. If photographs are referred to in the inspection report copies will be obtainable upon written request.

The goal of our inspection program is to verify compliance with each of the State Minimum Standards, not merely to find violation(s) of these standards. In order to achieve this we will, as I stated above, be inspecting each facility at least three times. This will provide the following advantages over the previous inspection techniques:

* The program will provide greater fairness to operators of facilities by reducing the possibility that one operator will be inspected under adverse conditions and another under favorable conditions.

* The program will allow for evaluation of conditions, which show seasonal variations such as effectiveness of leachate control systems, vectors, dust, etc.

* The program will provide a track record of compliance which will be used in evaluating standards for which a single violation may not be sufficient reason to place the facility on the State List of Non-Complying Facilities when the facility is generally in compliance with that standard, i.e., the daily cover standard.

Although we do not intend to provide advance notice of the inspection dates to operators, the Local Enforcement Agency (LEA) will be notified of those dates, and will be invited to accompany our staff on the inspection.

If, after three inspections, your facility continues to be operating in violation of one or more of the State Minimum Standards you will be notified of this finding by certified letter. A copy of that letter will be sent to the LEA. After 90 days or upon notification of correction of all violations(s), Board staff will reinspect the facility. If the facility is still in violation, staff will notify you and the LEA, by certified letter of staff's intent to recommend that the Board place the facility's name on the State List of Non-Complying Facilities at a regularly scheduled meeting of the Board. Should the Board place the facility on that list, State law (Government Code 66796.39) requires that the LEA develop a compliance schedule for correction of the violation(s). If compliance is not achieved within one year, Government Code section 66796.39 directs LEAs to revoke facility operating permits. If the facility is closed or abandoned, staff will recommend that the LEA issue a notice of violation and an order to correct the violations. That Notice and Order will also notify you or the owner of the facility that State law provides that "the unremedied condition of the facility is prima facie evidence of negligence, and in any action for damages against the owner of the property for injury caused by the unremedied condition, the burden of proving the injury was not caused by an unremedied condition shall be on the owner of the property".

If you have any questions regarding the program, please contact me at (916) 322-6172.

Sincerely,

Kerry D. Jones

Kerry D. Jones, Chief
Enforcement Division

cc: LEA

mea

Cheryl Hisatomi
First Inspection

NORWALK DUMP
13774 E. Imperial Highway,
Sante Fe Springs
19-AI-01

On November 20, 1985 I arrived at Norwalk Dump at 11:00 a.m. I met with John Price, Department of Public Works, Santa Fe Springs. We then proceeded to the office to announce ourselves. We met with Charles Pratty and Heran Siroonian, President and Vice President of Norwalk Dump Company and Dennis Donahue, Site Engineer.

Section 17638
According to Dennis Donahue, no log of special occurances is kept for the landfill

Section 17648
There are no back-up barriers on the dumping pad and no spotter. I saw a dumper remove his load by backing up quickly and slamming on his brakes. I did not see anyone attending the site per se. The active face is located in the back of a large recycling, car wrecking operation. Although, there are many people working on-site the landfill is rather isolated and thus essentially unattended.On November 22, 1985 I returned to complete my evaluation. This time a salvager was present. However, when he left the site once again became unattended.

Section 17657
The entry sign does not state what may or may not be accepted.

Section 17660
The road leading to the dumping area does not have adequate signs directing users to the dumping pad.

Section 17682
The permitted cover frequency for Norwalk Dump is 48 hours. This frequency is not being met. See photograph #4, roll #2 and Photograph #12, roll #3. Mr Donahue told me that cover is applied when the lifts reach a height of three feet.

Section 17686
On November 20, 1985 I observed a group of people dump a load of old mattresses and then scavenge around the pile of salvage nearby. Because of the remoteness of the dumping area and the large amounts of salvage nearby it seems that this type of scavenging may occur quite often.

Norwalk Dump

Section 17690
Salvage is stored haphazardly on the dumping pad and the landfill. Behind the pad, near the stockpile are two large piles of salvaged car parts. There is oil saturated soil surrounding these two piles. See Photographs #5,6,7,8,9, roll #2

Section 17711
There was significant amounts of litter though out the site. See photographs #1,2, roll #2.

According to my observations of Norwalk Dump, the facility is in non-compliance of the following sections of the State Minimum Standards:

17638 - Log of Special Occurrences
17648 - Supervision, due to lack of back-up barriers on pad and the sometimes unattended nature of the site
17657 - Entry sign
17682 - Cover frequency
17686 - Scavenging
17690 - Salvage location, due to haphazard manner of storage and oil soaked soil
17711 - Litter

SIGNED AND SENT

Cheryl Hisatomi

Working File

STATE OF CALIFORNIA GEORGE DEUKMEJIAN, Governor

CALIFORNIA WASTE MANAGEMENT BOARD
[illegible] NINTH STREET, SUITE 300
[illegible]AMENTO, CA 95814

OCT 24 1986

To: Charles Pratty, President
Norwalk Dump Company
13780 E. Imperial Highway
Sante Fe Springs, CA 90670

Subject: Report of inspection: Norwalk Disposal Site 19-AI-01

Government Code Section 66796.38 requires the California Waste Management Board (Board) to conduct inspections of solid waste facilities for the purpose of evaluating compliance with the State Standards for Solid Waste Handling and Disposal (Title 14. California Administrative Code, Division 7 Chapter 3, commencing with section 17200). Under this program, each facility will be inspected at least three separate times. As you are probably aware, the subject facility received its second inspection on July 16, 1986. Enclosed please find the Evaluation Report resulting from this second inspection. Copies of photographs or slides referred to in the report are available from the Board upon written request.

The goal of our inspection program is to verify compliance with each of the State Minimum Standards, not merely to find violation(s) of these standards. In order to achieve this we will, as I stated above, be inspecting each facility at least three times. This will provide the following advantages over the previous inspection techniques:

* The program will provide greater fairness to operators of facilities by reducing the possibility that one operator will be inspected under adverse conditions and another under favorable conditions.

* The program will allow for evaluation of conditions, which show seasonal variations such as effectiveness of leachate control systems, vectors, dust, etc.

* The program will provide a track record of compliance which will be used in evaluating standards for which a single violation may not be sufficient reason to place the facility on the State List of Non-Complying Facilities when the facility is generally in compliance with that standard, i.e., the daily cover standard.

Although we do not intend to provide advance notice of the inspection dates to operators, the Local Enforcement Agency (LEA) will be notified of those dates, and will be invited to accompany our staff on the inspection.

If, after the third inspection, your facility continues to be operating in violation of one or more of the State Minimum Standards you will be notified of this finding by certified letter. A copy of that letter will be sent to the LEA. After 90 days or upon notification of correction of all violations(s), Board staff will reinspect the facility. If the facility is still in violation, staff will notify you and the LEA, by certified letter of staff's intent to recommend that the Board place the facility's name on the State List of Non-Complying Facilities at a regularly scheduled meeting of the Board. Should the Board place the facility on that list, State law (Government Code 66796.39) requires that the LEA develop a compliance schedule for correction of the violation(s). If compliance is not achieved within one year, Government Code section 66796.39 directs LEAs to revoke facility operating permits. If the facility is closed or abandoned, staff will recommend that the LEA issue a notice of violation and an order to correct the violations. That Notice and Order will also notify you or the owner of the facility that State law provides that "the unremedied condition of the facility is prima facie evidence of negligence, and in any action for damages against the owner of the property for injury caused by the unremedied condition, the burden of proving the injury was not caused by an unremedied condition shall be on the owner of the property".

If you have any questions regarding the program, please contact me at (916) 322-1769.

Sincerely,

John K. Bell, Manager
Monitoring Section

Enclosure

cc: John Price, City Public Works Department

mea

CALIFORNIA WASTE MANAGEMENT BOARD

DISPOSAL SITE
EVALUATION REPORT

Facility Name: NORWALK DISPOSAL SITE **Facility ID No.:** 19-AI-0001

Name of Inspector: Allen Freihofer **Inspection Date:** 07-16-86

Inspector Signature: Allen Freihofer

CAC Section:	Observations:	Conclusions:
Disposal Site Information:		
17616 Report of Disposal Site Information	The RDSI does not reflect current site operations. This site has been closed since 1982. The Norwalk Transfer Station, a permitted small volume transfer station, now operates on top of part of the closed landfill. The wastes are hauled to the Puente Hills Landfill, 10 miles away. A large salvage yard is operated on most of the rest of the closed landfill.	Violation
Design Responsibility:		
17626 Design Responsibility	This standard applies to new facilities only. This is not a new facility.	N/A
17627 Ultimate Use	A salvage yard is and will continue to be operated on top of the fill area.	Comply
17628 General Design Parameters	This site preexists the implementation of this standard.	N/A
17629 Public Health Design Parameters	I saw no evidence of the design failing to meet the criteria listed in section 17629.	Comply
17636 Weight/Volume Records	This is a closed site.	N/A

Section Manager [illegible]

Facility Name: NORWALK DISPOSAL SITE **Facility ID No.:** 19-AI-0001

Name of Inspector: Allen Freihofer **Inspection Date:** 07-16-86

Inspector Signature: Allen Freihofer

CAC Section:	Observations:	Conclusions:
17637 Subsurface Records	The site engineer showed me contour maps which show previous ground levels.	Comply
17638 Special Occurrences	This is a closed site.	N/A
17639 Inspection of Records	Records were available during normal business hours. I reviewed the records.	Comply
Disposal Site Personnel:		
17646 Availability	This is a closed site.	N/A
17647 Training	This is a closed site.	N/A
17648 Supervision	This is a closed site	N/A
17649 Site Attendant	This is a closed site.	N/A
Disposal Site Improvements:		
17656 Identification Signs	This is a closed site.	N/A
17657 Entry Signs	This is a closed site.	N/A
17658 Site Security	The site is surrounded by a chain link fence topped with barbed wire. There is a gate at the front entrance. No evidence of unauthorized access was observed.	Comply

Facility Name: NORWALK DISPOSAL SITE **Facility ID No.:** 19-AI-0001

Name of Inspector: Allen Freihofer **Inspection Date:** 07-16-86

Inspector Signature: Allen Freihofer

CAC Section:	Observations:	Conclusions:
17659 Access Roads	Roads were smooth and allowed good site access. No dust or tracking problem was observed.	Comply
17660 Internal Roads	This is a closed site.	N/A
Disposal Site Health and Safety:		
17666 Sanitary Facilities	This is a closed site.	N/A
17667 Water Supply	This is a closed site.	N/A
17668 Communications Facilities	This is a closed site.	N/A
17669 Lighting	This is a closed site.	N/A
17670 Personnel Health And Safety	This is a closed site.	N/A
Disposal Site Operations:		
17676 Confined Unloading	This is a closed site.	N/A
17677 Spreading and Compacting	This is a closed site.	N/A

Facility Name: NORWALK DISPOSAL SITE **Facility ID No.:** 19-AI-0001

Name of Inspector: Allen Freihofer **Inspection Date:** 07-16-86

Inspector Signature: Allen Freihofer

CAC Section:	Observations:	Conclusions:
17678 Slopes and Cuts	This is a closed site.	N/A
17679 Final Site Face	Final site faces had a neat and finished appearance and had slopes of one and three quarters to one or flatter.	Comply
17680 Stockpiling	This is a closed site.	N/A
17681 Availability of Cover	This is a closed site.	N/A
17682 Cover	This is a closed site.	N/A
17683 Performance Standards	This is a closed site.	N/A
17684 Intermediate Cover	This is a closed site.	N/A
17685 Final Cover	Mr. Sirooian, Vice President of Norwalk Dump Company which owns and formerly operated the site, claimed that the final cover is well over the required two feet. I saw no evidence to the contrary.	Comply
17686 Scavenging	This is a closed site.	N/A
17687 Scavaging Permitted	This is a closed site. (See notes:)	N/A

Facility Name: NORWALK DISPOSAL SITE **Facility ID No.:** 19-AI-0001

Name of Inspector: Allen Freihofer **Inspection Date:** 07-16-86

Inspector Signature: Allen Freihofer

CAC Section:	Observations:	Conclusions:
17688 Volume Reduction and Energy Recovery	This is a closed site.	N/A
17689 Processing Area	This is a closed site. (See notes:)	N/A
17690 Processing Area	This is a closed site. (See notes:)	N/A
17691 Removal	This is a closed site. (See notes:)	N/A
17692 Non-Salvageable Items	This is a closed site. (See notes:)	N/A
Disposal Site Controls:		
17701 Nuisance Control	I saw no evidence of this closed site causing a public nuisance.	Comply
17702 Animal Feeding	No animals were observed feeding on waste.	Comply
17703 Fire Control	No fires or evidence of recent fires were observed. County and City Fire Departments are called for any fire.	Comply
17704 Leachate Control	No leachate was observed at this site.	Comply

Facility Name: NORWALK DISPOSAL SITE **Facility ID No.:** 19-AI-0001

Name of Inspector: Allen Freihofer **Inspection Date:** 07-16-86

Inspector Signature: Allen Freihofer

CAC Section:	Observations:	Conclusions:
17705 Gas Control	No hazard or nuisance due to the presence of landfill gases was detected. I checked 11 probes located on site and found no evidence of the presence of methane gas.	Comply
17706 Dust Control	The minor amount of dust present was not causing a public nuisance.	Comply
17707 Vector and Bird Control	No vector problem or bird problem was observed.	Comply
17708 Drainage and Erosion Control	Site contours and drainage ditches or channels control site drainage. No significant erosion damage was observed. The site should be graded for better drainage.	Comply
17709 Contact with Water	No wastes in contact with water were observed.	Comply
17710 Grading of Fill Surfaces	Ground surface was uneven. Low spots must be filled with clean earth and graded prior to completion of official closure. (See slides II-4,5,6)	Violation
17711 Litter Control	No accumulations of litter likely to cause a public nuisance were observed.	Comply
17712 Noise Control	Noise levels did not seem likely to cause a public nuisance.	Comply

Facility Name: NORWALK DISPOSAL SITE **Facility ID No.:** 19-AI-0001

Name of Inspector: Allen Freihofer **Inspection Date:** 07-16-86

Inspector Signature: Allen Freihofer

CAC Section:	Observations:	Conclusions:
17713 Odor Control	No odors likely to cause a public nuisance were detected.	Comply
17714 Traffic Control	Traffic flow did not appear likely to cause a public safety hazard and I did not observe vehicles stacking onto public roads.	Comply
17715 Ponded Liquid	There were no ponds on this site.	Comply
Disposal Site Equipment:		
17726 General	This is a closed site.	N/A
17727 Standby Equipment	This is a closed site.	N/A
Disposal Site Maintenance:		
17731 General	I saw no conditions indicating a lack of preventive maintenance.	Comply
17732 Operating Site Maintenance	Defective or deteriorated conditions were not observed.	Comply
17733 Insp. on Completion	The site has already closed.	N/A
17734 Completed Site Maintenance	I saw no evidence of leachate, methane, extensive surface cracking, settlement, or other indication of environmental degradation or public health hazard due to this closed landfill's existance.	Comply

Facility Name: NORWALK DISPOSAL SITE **Facility ID No.:** 19-AI-0001

Name of Inspector: Allen Freihofer **Inspection Date:** 07-16-86

Inspector Signature: Allen Freihofer

CAC Section:	Observations:	Conclusions:
17735 Recording	The operator has not yet filed a detailed site description with the county recorder.	Violation
Disposal Site Special Wastes:		
17741 Burning Wastes	This is a closed site. No wastes are disposed of at this site.	N/A
17742 Hazardous Wastes	This is a closed site. No wastes are disposed of at this site.	N/A
17743 Liquid Wastes	This is a closed site. No wastes are disposed of at this site.	N/A
17744 Dead Animals	This is a closed site. No wastes or dead animals are disposed of at this site.	N/A
Disposal Site Reports and Reviews:		
17751 Periodic Site Review	The current permit was issued 02-23-79. A five year review was due 02-23-84, and has not been completed. The existing permit does not reflect site closure.	Violation

Notes:

-This is a closed landfill. There is no salvaging of disposed waste. A large salvage yard exists on top of the closed landfill. This salvage yard is the planned end use of this site. (See Section 17616, 17627).

-At the site, John Bell and I met with Heran Siroonian, Vice President of Norwalk Dump Company, and with Dennis Donahue, the site engineer. Mr. Siroonian accompanied me and Mr. Bell on our inspection of the site.

-The weather was clear and sunny.

SWIS-00 (REV. 1/83)

NOTICE OF INSPECTION DISPOSAL SITE

LOCAL ENFORCEMENT AGENCY: City of Norwalk Dept. of Public Works

FACILITY FILE NUMBER (COUNTY LEA NUMBER)	PROGRAM CODE	INSPECTION DATE (1011) MM DD YY	T-OUT / T-IN	TOTAL TIME (DECIMAL HOURS) (1031)
19-AI-0001	P	07-16-86		2

FACILITY NAME: NORWALK DISPOSAL SITE

FACILITY LOCATION: 13774 E. Imperial Hwy.

INSPECTOR: Allen Freihofer

ALSO PRESENT: John Bell, Heran Sirounian

RECEIVED BY:
Operator _____
Owner _____

Comments: The following violations were noted during this inspection:
17710 - The fill surface is uneven. Low spots must be filled and graded to promote lateral runoff & prevent ponding.
17735 - A detailed description of the site and site boundaries must be filed with the County Recorder, LEA, & Local Planning Agency.
17616 - The Report of Disposal Site Information must be revised to reflect the fact that the landfill is closed.
17751 - The 5-year review must be completed.

	*V	C
(3011) RECORDS		☒
☐ ACCURATE WEIGHT/VOLUME RECORDS MAINTAINED 17636 N/A		
☐ ADEQUATE SUBSURFACE RECORDS MAINTAINED 17637		
☐ LOG OF SPECIAL OCCURRENCES MAINTAINED 17638 N/A		
☐ RECORDS AVAILABLE FOR INSPECTION 17639		
(3021) PERSONNEL		
☐ ADEQUATE NUMBER OF QUALIFIED PERSONNEL AVAILABLE 17646		
☐ PERSONNEL ADEQUATELY TRAINED 17647		
☐ ADEQUATE SUPERVISION PROVIDED 17648 N/A		
☐ SITE ATTENDANT AVAILABLE FULL-TIME OR AS DETERMINED BY LEA 17649		
(3031) SIGNS		
☐ IDENTIFICATION SIGNS AT EACH POINT OF ACCESS 17656		
☐ ENTRY SIGN STATES FEES, HOURS OF OPERATION, WASTES ACCEPTED/NOT ACCEPTED 17657 N/A		
☐ NON-HAZARDOUS UNATTENDED SITES HAVE SIGN WARNING USERS OF UNAVAILABILITY OF COMMUNICATION FACILITIES 17658		
(3041) SECURITY		☒
☐ ADEQUATE PERIMETER SECURITY, HAZARDOUS AREAS FENCED AND IDENTIFIED 17659		
(3051) ROADS		☒
☐ ACCESS ROADS HAVE SMOOTH SURFACE, MINIMIZE DUST AND TRACKING OF MUD, AND ALLOW ALL-WEATHER ACCESS 17659		
☐ INTERNAL ROADS IN SAFE CONDITION, PROVIDE ACCESS DURING INCLEMENT WEATHER, AND ARE PROVIDED WITH DIRECTIONS 17660 N/A		
(3071) SANITATION		
☐ ADEQUATE SANITARY FACILITIES AVAILABLE 17666 N/A		
☐ SAFE ADEQUATE DRINKING WATER AVAILABLE 17667		
(3081) COMMUNICATIONS		
☐ COMMUNICATION FACILITIES AVAILABLE WHERE HAZARDOUS WASTES ARE ACCEPTED 17668 N/A		
(3091) LIGHTING		
☐ LIGHTING ADEQUATE 17669 N/A		
(3101) SAFETY		
☐ SAFETY EQUIPMENT IN USE AND BEING WORN 17670 N/A		

	V	C
(3111) CONFINED UNLOADING N/A		
☐ UNLOADING ADEQUATELY CONFINED 17676		
(3141) SPREADING/COMPACTING N/A		
☐ SPREADING AND COMPACTION IN TWO-FOOT LAYERS 17677		
(3151) SLOPES/CUTS/GRADING	☒	☒
☐ WORKING FACE SLOPES ALLOW EFFECTIVE COMPACTION. DEPTH OF CUTS AND SLOPES OF TRENCH SIDES AS APPROVED BY LEA 17678 N/A		
☐ FINAL SLOPES HAVE NEAT APPEARANCE AND ARE 1-3/4 : 1 OR FLATTER 17679		
☒ GRADING OF FILL SURFACES ADEQUATE 17710		
(3161) COVER		☒
☐ STOCKPILING OF COVER DOES NOT INTERFERE WITH OPERATIONS 17680 N/A		
☐ SUITABLE QUALITY AND SUPPLY OF COVER MATERIAL AVAILABLE 17681 N/A		
☐ COVER PROVIDED AT REQUIRED DEPTH AND FREQUENCY 17682 N/A		
☐ INTERMEDIATE COVER PROVIDED AT REQUIRED DEPTH AND FREQUENCY 17684 N/A		
☒ FINAL COVER PROVIDED AS REQUIRED 17685		
(3171) SALVAGING/PROCESSING		☒
☐ SCAVENGING PROHIBITED 17686		
☐ SALVAGING DOES NOT INTERFERE WITH OPERATIONS 17687		
☐ VOLUME REDUCTION AND ENERGY RECOVERY DO NOT INTERFERE WITH OPERATIONS OR CREATE HEALTH, SAFETY OR ENVIRONMENTAL PROBLEMS 17688		
☐ SALVAGING AND VOLUME REDUCTION CONFINED TO CLEARLY IDENTIFIED AREAS 17689		
☐ SALVAGE STORAGE LOCATION OK, VOLUME AS APPROVED BY LEA, MINIMIZES FIRE, NUISANCE 17690		
☐ SALVAGE STORAGE TIME DOES NOT RESULT IN HEALTH OR FIRE PROBLEMS 17691		
☐ SALVAGED MATERIALS APPROVED BY LEA AND LOCAL HEALTH 17692		
(3181) NUISANCE		☒
☐ OPERATIONS DO NOT CREATE A PUBLIC NUISANCE 17701		
☐ FEEDING OF REFUSE TO ANIMALS FOR HUMAN CONSUMPTION PROHIBITED 17702 N/A		

	V	C
(3191) FIRE		☒
☐ FIRE CONTROL ADEQUATE 17703		
(3192) FIRE (P)		
☐ BURNING MATERIALS SPREAD AND EXTINGUISHED. LEA, SWMB NOTIFIED IMMEDIATELY OF FIRE NOT EXTINGUISHED IN 24 HOURS 17683 N/A		
(3201) LEACHATE		☒
☐ ADEQUATE STEPS TAKEN TO MONITOR, COLLECT, TREAT, AND DISPOSE OF LEACHATES 17704		
☐ NO WASTES IN DIRECT CONTACT WITH WATER EXCEPT AS APPROVED BY RWQCB 17709		
(3202) LEACHATE (P) N/A		
☐ REFUSE COVERED WITH NEXT DAY'S REFUSE OR WITH SIX INCHES OF COMPACTED SOIL. TOTAL AREA OF EXPOSED REFUSE IS AS SPECIFIED FOR WET AND DRY SEASONS 17693		
(3211) GAS		☒
☐ GAS MONITORING AND CONTROL AS REQUIRED 17705		
(3221) DUST		☒
☐ DUST CONTROL ADEQUATE 17706		
(3231) VECTORS/BIRDS		☒
☐ VECTOR AND BIRD CONTROL ADEQUATE 17707		
☐ LIQUID PONDS MINIMIZE VECTOR PROPAGATION 17713		
(3232) VECTORS (P) N/A		
☐ THRESHOLD VALUES FOR VECTOR POPULATIONS NOT EXCEEDED 17693		
(3241) DRAINAGE/EROSION		☒
☐ DRAINAGE AND EROSION CONTROL ADEQUATE 17708		
(3251) LITTER		☒
☐ LITTER CONTROL ADEQUATE 17711		
(3252) LITTER (P) N/A		
☐ LITTER NOT ALLOWED TO MIGRATE OFF-SITE 17693		
(3261) NOISE		☒
☐ NOISE CONTROL ADEQUATE 17712		
(3271) ODOR		☒
☐ ODOR CONTROL ADEQUATE 17713		
(3272) ODOR (P) N/A		
☐ AMBIENT AIR AT OR BEYOND FACILITY BOUNDARY IS NOT ODOROUS 17693		

	V	C
(3281) TRAFFIC		☒
☐ TRAFFIC CONTROL ADEQUATE WITHIN SITE. TRAFFIC MINIMIZES INTERFERENCE, SAFETY PROBLEMS, AND STACKING ON PUBLIC ROADS 17714		
(3291) EQUIPMENT N/A		
☐ EQUIPMENT ADEQUATE IN TYPE, CAPACITY, AND NUMBER, AND IS ADEQUATELY MAINTAINED 17726		
☐ STANDBY EQUIPMENT AVAILABLE TO COMPLY WITH SEC. 17682 AND OTHER SECTIONS 17727		
(3301) MAINTENANCE		☒
☐ EFFECTIVE MAINTENANCE PROCEDURES AND PROGRAMS DEVELOPED AND UTILIZED 17731		
☐ ADEQUATE MONITORING AND REPAIR OF DETERIORATED CONDITIONS 17732		
(3311) CLOSURE	☒	
☐ AFTER CLOSURE, IF LEACHATE, EXTENSIVE SURFACE CRACKING OR SETTLEMENT OCCURS, THE OWNER SHALL NOTIFY LEA AND SHALL MONITOR AND REPAIR SITE FOR A PERIOD OF 5 YEARS OR LONGER 17734		
☒ UPON SITE CLOSURE, DETAILED DESCRIPTION MUST BE FILED WITH THE LEA AND WITH THE COUNTY RECORDER 17739		
(3321) SPECIAL WASTES		
☐ BURNING WASTES IMMEDIATELY SPREAD AND EXTINGUISHED IN SAFE AREA 17741		
☐ SITE ACCEPTS ONLY APPROVED HAZARDOUS WASTES AND TAKES PRECAUTIONS TO ELIMINATE OR CONTROL HARMFUL DUSTS, FUMES, MISTS, VAPORS, OR GASES 17742		
☐ LIQUID WASTES APPROVED BY RWQCB, LOCAL HEALTH ENTITY AND LEA 17743		
☐ DEAD ANIMALS ALLOWED BY LOCAL REGULATIONS 17744		
N/A		
(3331) OTHER	☒	
☒ 17616 - Report of Info		
17751 - 5 Year Review		

*V = Violation
C = Compliance

DISTRIBUTION: WHITE — CWMB YELLOW — OPERATOR PINK — LEA

STATE OF CALIFORNIA

GEORGE DEUKMEJIAN, Governor

CALIFORNIA WASTE MANAGEMENT BOARD
NINTH STREET, SUITE 300
SACRAMENTO, CA 95814

FEB 19 1987

To: Charles Pratty, President
Norwalk Dump Company
13780 E. Imperial Highway
Santa Fe Springs, CA 90670

Subject: Report of Inspection: Norwalk Disposal Site 19-AI-01

Government Code Section 66796.38 requires the California Waste Management Board (Board) to conduct inspections of solid waste facilities for the purpose of evaluating compliance with the State Standards for Solid Waste Handling and Disposal (Title 14. California Administrative Code, Division 7 Chapter 3, commencing with section 17200). Under this program, each facility will be inspected at least three separate times. As you are probably aware, the subject facility received its third inspection on December 16, 1986. Enclosed please find the Evaluation Report resulting from this third inspection. Copies of photographs or slides referred to in the report are available from the Board upon written request.

Results of the three field inspections along with all pertinent supporting data in our files have now undergone staff review. A final staff report is currently being prepared and will be sent to you as soon as possible. We are concerned with the following repeated and/or uncorrected violations of State Minimum Standards:

17710 - Grading of Fill Surfaces (Repeated)

At the March meeting of the California Waste Management Board tentatively scheduled for March 26-27, 1987 staff will recommend that the Board direct the Chief Executive Officer to issue a letter notifying you of the Board's intent to place the subject facility on the State List of Non-Complying Facilities unless specified corrective measures are implemented. You will be directed to submit a letter to the Board within 30 days stating specific dates for taking such actions.

After 90 days or upon notification that violations have been corrected, Board staff would reevaluate compliance efforts at the site. The reevaluation would include a review of any new information regarding compliance efforts at the site and additional inspections by Board staff as necessary. If the facility is still in violation or has not implemented Board recommended compliance initiatives, staff will go before the Board with a recommendation that the Board place the site on the State List of Non-Complying Facilities.

You are invited to address the Board with any information you feel the Board should consider at its March meeting. A notice of the meeting will be sent at least 10 days prior to the scheduled date.

A copy of this letter and the enclosed report will be sent to the LEA. If you have any questions regarding this program, please contact me at (916) 322-6172.

Sincerely,

Kerry D. Jones

Kerry D. Jones, Chief
Enforcement Division
Enclosure

cc: John Price, City Department of Public Works

mea

CALIFORNIA WASTE MANAGEMENT BOARD

SOLID WASTE FACILITY
EVALUATION REPORT

Facility Name: Norwalk Disposal Site Facility ID No.: 19-AI-01

Name of Inspector: Herbert Berton Inspection Dates: 12/16/86

Signature: Herbert Berton

LEGEND

C = Compliance V = Violation
I = Indeterminate N = Not Applicable

CAC	SECTION	OBSERVATIONS	RESULT
		DISPOSAL SITE INFORMATION	
17658	Site Security.	The site is surrounded by a chain link fence topped with rolled barbed wire. I observed no evidence of unauthorized entry. See Photo III-1.	C
17679	Final Site Face.	The final exterior surface appeared neat and finished and was of proper slope. The angle, as measured by clinometer, was 26 degrees which is equal to a ratio of 2.05:1, horizontal to vertical.	C
17685	Final Cover.	According to Dennis Donahue, Site Engineer, the depth of the final cover is well over the required two feet. I did not observe any exposed waste in areas where final cover had been applied.	C

Section Manager _____

CAC	SECTION	OBSERVATIONS	RESULT
17688	Volume Reduction and Energy Recovery.	I observed no energy recovery at this closed site.	N
17701	Nuisance Control.	I observed no evidence of this closed site causing a public nuisance.	C
17703	Fire Control.	City and County fire departments respond to any fires. No fires or evidence of recent fires were observed.	C
17704	Leachate Control.	According to Quang Nguen, Area Engineer for the Regional Water Quality Control Board, Los Angeles Region, no leachate monitoring is required at this time. I observed no leachate at this site.	C
17705	Gas Control.	No hazard or nuisance due to presence of landfill gas was detected. I monitored the 11 probes located on the site boundaries and found no detectable amounts of landfill gas.	C
17707	Vector and Bird Control.	I observed no vectors or birds at this site.	C
17708	Drainage and Erosion Control.	I did not observe improper drainage control or inadequate erosion control.	C
17709	Contact with Water.	I observed no waste in contact with water.	C
17710	Grading of Fill Surfaces.	There is a low spot at the southeast corner of the site that must be filled and properly graded to prevent ponding. See Photo III-2.	V
17713	Odor Control.	No odors were detected which would cause a public nuisance.	C
17715	Ponded Liquid.	This site did not have any ponded liquid.	C
17726	General.	This is a closed site.	N

Inspector: Norbert Barton

CAC	SECTION	OBSERVATIONS	RESULT
17731	General.	I observed no evidence indicating a lack of preventative maintenance.	C
17733	Inspection on Completion.		I
17734	Completed Site Maintenance.	I observed no evidence or indication of environmental degradation or public health hazard due to the existance of this closed site.	C
17735	Recording.	According to Dennis Donahue, Site Engineer, the operator has not filed a detailed site description and map with the Local Enforcement Agency, the County Department of Public Works, and the county recorder upon closure.	V
NOTES			

Inspector: Herbert Barton

SWIS-09 (REV. 1/88)

NOTICE OF INSPECTION DISPOSAL SITE

LOCAL ENFORCEMENT AGENCY: _____

FACILITY FILE NUMBER (COUNTY LEA)	PROGRAM CODE	INSPECTION DATE (MM DD YY)	T-OUT / T-IN	TOTAL TIME (DECIMAL HOURS)
19 AI 01	P	(1011) 12/16/87		(1031) 4

FACILITY NAME: Norwalk Disposal Site

FACILITY LOCATION:

INSPECTOR: H. Berton

ALSO PRESENT:

RECEIVED BY:
Operator _____
Owner _____

Comments: See Enclosed Evaluation Report

	*V	C
(3011) RECORDS		
☐ ACCURATE WEIGHT/VOLUME RECORDS MAINTAINED 17636		
☐ ADEQUATE SUBSURFACE RECORDS MAINTAINED 17637 N/A		
☐ LOG OF SPECIAL OCCURRENCES MAINTAINED 17638		
☐ RECORDS AVAILABLE FOR INSPECTION 17639		
(3021) PERSONNEL		
☐ ADEQUATE NUMBER OF QUALIFIED PERSONNEL AVAILABLE 17646		
☐ PERSONNEL ADEQUATELY TRAINED 17647		
☐ ADEQUATE SUPERVISION PROVIDED 17648 N/A		
☐ SITE ATTENDANT AVAILABLE FULL-TIME OR AS DETERMINED BY LEA 17649		
(3031) SIGNS		
☐ IDENTIFICATION SIGNS AT EACH POINT OF ACCESS 17656 N/A		
☐ ENTRY SIGN STATES FEES, HOURS OF OPERATION, WASTES ACCEPTED/NOT ACCEPTED 17657		
☐ NON-HAZARDOUS UNATTENDED SITES HAVE SIGN WARNING USERS OF UNAVAILABILITY OF COMMUNICATION FACILITIES 17658		
(3041) SECURITY		☒
☐ ADEQUATE PERIMETER SECURITY, HAZARDOUS AREAS FENCED AND IDENTIFIED 17658		
(3051) ROADS		
☐ ACCESS ROADS HAVE SMOOTH SURFACE, MINIMIZE DUST AND TRACKING OF MUD, AND ALLOW ALL-WEATHER ACCESS 17659		
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(3071) SANITATION		
☐ ADEQUATE SANITARY FACILITIES AVAILABLE 17666 N/A		
☐ SAFE ADEQUATE DRINKING WATER AVAILABLE 17667		
(3081) COMMUNICATIONS		
☐ COMMUNICATION FACILITIES AVAILABLE WHERE HAZARDOUS WASTES ARE ACCEPTED 17668 N/A		
(3091) LIGHTING		
☐ LIGHTING ADEQUATE 17669 N/A		
(3101) SAFETY		
☐ SAFETY EQUIPMENT IN USE AND BEING WORN 17670 N/A		

	V	C
(3111) CONFINED UNLOADING		
☐ UNLOADING ADEQUATELY CONFINED 17676 N/A		
(3141) SPREADING/COMPACTING		
☐ SPREADING AND COMPACTION IN TWO-FOOT LAYERS 17677 N/A		
(3151) SLOPES/CUTS/GRADING		☒
☐ WORKING FACE SLOPES ALLOW EFFECTIVE COMPACTION, DEPTH OF CUTS AND SLOPES OF TRENCH SIDES AS APPROVED BY LEA 17678		
☒ FINAL SLOPES HAVE NEAT APPEARANCE AND ARE 1-3/4 : 1 OR FLATTER 17679		
☒ GRADING OF FILL SURFACES ADEQUATE 17710		
(3161) COVER		☒
☐ STOCKPILING OF COVER DOES NOT INTERFERE WITH OPERATIONS 17680		
☐ SUITABLE QUALITY AND SUPPLY OF COVER MATERIAL AVAILABLE 17681		
☐ COVER PROVIDED AT REQUIRED DEPTH AND FREQUENCY 17682		
☐ INTERMEDIATE COVER PROVIDED AT REQUIRED DEPTH AND FREQUENCY 17684		
☒ FINAL COVER PROVIDED AS REQUIRED 17685		
(3171) SALVAGING/PROCESSING		☒
☐ SCAVENGING PROHIBITED 17686		
☐ SALVAGING DOES NOT INTERFERE WITH OPERATIONS 17687 N/A		
☒ VOLUME REDUCTION AND ENERGY RECOVERY DO NOT INTERFERE WITH OPERATIONS OR CREATE HEALTH, SAFETY OR ENVIRONMENTAL PROBLEMS 17688		
☐ SALVAGING AND VOLUME REDUCTION CONFINED TO CLEARLY IDENTIFIED AREAS 17689		
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☐ SALVAGE STORAGE TIME DOES NOT RESULT IN HEALTH OR FIRE PROBLEMS 17691		
☐ SALVAGED MATERIALS APPROVED BY LEA AND LOCAL HEALTH 17692		
(3181) NUISANCE		☒
☒ OPERATIONS DO NOT CREATE A PUBLIC NUISANCE 17701		
☐ FEEDING OF REFUSE TO ANIMALS FOR HUMAN CONSUMPTION PROHIBITED 17[illegible]		

	V	C
(3191) FIRE		☒
☐ FIRE CONTROL ADEQUATE 17703		
(3192) FIRE (P)		
☐ BURNING MATERIALS SPREAD AND EXTINGUISHED. LEA, SWMB NOTIFIED IMMEDIATELY OF FIRE NOT EXTINGUISHED IN 24 HOURS 17683 N/A		
(3201) LEACHATE		☒
☒ ADEQUATE STEPS TAKEN TO MONITOR, COLLECT, TREAT, AND DISPOSE OF LEACHATES 17704		
☒ NO WASTES IN DIRECT CONTACT WITH WATER EXCEPT AS APPROVED BY RWQCB 17709		
(3202) LEACHATE (P) N/A		
☐ REFUSE COVERED WITH NEXT DAY'S REFUSE OR WITH SIX INCHES OF COMPACTED SOIL. TOTAL AREA OF EXPOSED REFUSE IS AS SPECIFIED FOR WET AND DRY SEASONS 17683		
(3211) GAS		☒
☐ GAS MONITORING AND CONTROL AS REQUIRED 17705		
(3221) DUST		
☐ DUST CONTROL ADEQUATE 17706 N/A		
(3231) VECTORS/BIRDS		☒
☒ VECTOR AND BIRD CONTROL ADEQUATE 17707		
☒ LIQUID PONDS MINIMIZE VECTOR PROPAGATION 17715		
(3232) VECTORS (P)		
☐ THRESHOLD VALUES FOR VECTOR POPULATIONS NOT EXCEEDED 17683 N/A		
(3241) DRAINAGE/EROSION		☒
☐ DRAINAGE AND EROSION CONTROL ADEQUATE 17708		
(3251) LITTER		
☐ LITTER CONTROL ADEQUATE 17711 N/A		
(3252) LITTER (P)		
☐ LITTER NOT ALLOWED TO MIGRATE OFF-SITE 17683 N/A		
(3261) NOISE		
☐ NOISE CONTROL ADEQUATE 17712 N/A		
(3271) ODOR		☒
☐ ODOR CONTROL ADEQUATE 17713		
(3272) ODOR (P)		
☐ AMBIENT AIR AT OR BEYOND FACILITY BOUNDARY IS NOT ODOROUS 17683 N/A		

	V	C
(3281) TRAFFIC		
☐ TRAFFIC CONTROL ADEQUATE WITHIN SITE. TRAFFIC MINIMIZES INTERFERENCE, SAFETY PROBLEMS, AND STACKING ON PUBLIC ROADS 17714 N/A		
(3291) EQUIPMENT		☒
☒ EQUIPMENT ADEQUATE IN TYPE, CAPACITY, AND NUMBER, AND IS ADEQUATELY MAINTAINED 17726		
☐ STANDBY EQUIPMENT AVAILABLE TO COMPLY WITH SEC. 17682 AND OTHER SECTIONS 17727		
(3301) MAINTENANCE		☒
☒ EFFECTIVE MAINTENANCE PROCEDURES AND PROGRAMS DEVELOPED AND UTILIZED 17731		
☐ ADEQUATE MONITORING AND REPAIR OF DETERIORATED CONDITIONS 17732		
(3311) CLOSURE	☒	
☐ AFTER CLOSURE, IF LEACHATE, EXTENSIVE SURFACE CRACKING OR SETTLEMENT OCCURS, THE OWNER SHALL NOTIFY LEA AND SHALL MONITOR AND REPAIR SITE FOR A PERIOD OF 5 YEARS OR LONGER 17734		
☒ UPON SITE CLOSURE, DETAILED DESCRIPTION MUST BE FILED WITH THE LEA AND WITH THE COUNTY RECORDER 17735		
(3321) SPECIAL WASTES		
☐ BURNING WASTES IMMEDIATELY SPREAD AND EXTINGUISHED IN SAFE AREA 17741		
☐ SITE ACCEPTS ONLY APPROVED HAZARDOUS WASTES AND TAKES PRECAUTIONS TO ELIMINATE OR CONTROL HARMFUL DUSTS, FUMES, MISTS, VAPORS, OR GASES 17742 N/A		
☐ LIQUID WASTES APPROVED BY RWQCB, LOCAL HEALTH ENTITY AND LEA 17743		
☐ DEAD ANIMALS ALLOWED BY LOCAL REGULATIONS 17744		
(3331) OTHER		
☐ _____		

*V = Violation
C = Compliance

DISTRIBUTION: WHITE — CWMB YELLOW — OPERATOR PINK — LEA

CALIFORNIA WASTE MANAGEMENT BOARD
Agenda Item #11-C
March 26-27, 1987

Item:

Consideration of notifying the operator of the Savage Canyon Landfill (Los Angeles County) of the Board's intent to include that facility on the State List of Non-Complying Facilities pursuant to Government Code Section 66796.38.

Key Issues:

- Savage Canyon has been evaluated for compliance with State Minimum Standards including three field inspections by Board staff.

- Ongoing and/or repeated violations of the following State Minimum Standards were documented:

  17705 - Gas Control (ongoing)
  17708 - Drainage and Erosion Control (repeated)
  17751 - Periodic Site Review (ongoing)

- Staff recommends that the Board authorize the Chief Executive Officer to notify the facility's owner of Board's intent to add the site to the State List of Non-Complying Facilities unless specified corrective measures are implemented within 90 days of notice.

Site Information:

Name:	Savage Canyon Landfill
SWIS #:	19-AH-001
Facility Type:	Class III Sanitary Landfill (New Classification System)
Operational Status:	Open
Location:	13919 E. Penn St., Whittier, CA (Los Angeles County)
Setting:	Residential/open space
Permitted Tonnage:	350 tons per day
In Place Volume:	Approximately 3,931,200 tons

Site Information (Continued):

Permitted Acreage:	124 acres
Facility Owner:	City of Whittier Public Works
Facility Operator:	City of Whittier Public Works
Local Enforcement Agency:	City of Whittier Public Services and L.A. County Health Services

Summary of Repeated Presley Violations:

CAC Section	1st Inspec. 12/17/85	2nd Inspec. 7/24/86	3rd Inspec. 12/29/86
17705 - Gas Control	Indeter.	Indeter.	Violation
17708 - Drainage/ Erosion Control	Comply	Violation	Violation
17751 - Periodic Site Review	Violation	Violation	Violation

Background:

Savage Canyon Landfill is a 124 acre Class III facility (new classification system) owned and operated by the City of Whittier. It is located at 13919 E. Penn Street, Whittier, CA. The site began operation in 1930 and accepts 350 tons of group 2 and 3 wastes per day, primarily residential and commercial refuse. No liquids or sludges are accepted. Land within a 1000 feet of the site perimeter is zoned R-1. Ten to 15 houses are located within 1000 feet of the southeast site perimeter near the main entrance. Land adjacent to the remainder of the site perimeter is open space.

The facility has Board approval for a 45 acre expansion incorporated into its original Solid Waste Facilities Permit of March, 1979. Negotiations are ongoing to purchase this adjacent property. Projected site life is 11 years without site expansion and 41 years with the planned expansion. However, supplies of cover material on the current acreage are very limited and are not expected to last more than a few years.

The site has no groundwater monitoring program and has been operating under Los Angeles Regional Water Quality Control Board (L.A. RWQCB) Waste Discharge Requirement No. 63-39 since 1963. Quang Nguyen of the L.A. RWQCB stated that the site is scheduled

for a Subchapter 15 compliance review early in 1987. The facility has a #2 ranking under the Calderon program and a Solid Waste Assessment Test (SWAT) proposal is due to the L.A. RWQCB by April, 1987. The operator has contracted with John Mandeville and Associates to prepare the SWAT proposal and perform other necessary engineering work at the site.

Past Compliance:

The first CWMB on-site inspection of the facility was conducted on 12/17/85. During the year prior to this inspection, the Local Enforcement Agency (LEA) did not report the results of any inspections to the State Solid Waste Information System (SWIS). The LEA, L.A. RWQCB, South Coast Air Quality Management District (AQMD), and the L.A. Consolidated Fire District were contacted regarding the compliance history of the site. No agency had any records of complaints or violations that would indicate noncompliance with State Minimum Standards.

Recent Compliance:

Between 12/17/85 and 12/29/86, CWMB staff evaluated compliance of Savage Canyon Landfill with State Minimum Standards. The results of three on-site inspections are presented in the chronology below and in attachments #1, #3, and #7,. During the evaluation period, the LEA only reported the results of one on-site inspection to SWIS. No violations of Minimum Standards were reported. Contacts with the LEA, the L.A. RWQCB, South Coast AQMD, and L.A. Consolidated Fire Department prior to each CWMB inspection did not indicate any significant problems at the site.

A chronology of events occurring during the CWMB evaluation period is presented below:

<u>December 17, 1985</u>

The 1st of three inspections by CWMB staff was conducted by Richard Hill. The following violations of CAC sections were documented:

17742 - Hazardous Wastes
17751 - Periodic Site Review

Site compliance with CAC Sections 17684 (Intermediate Cover) and 17705 (Gas Control) was given an indeterminate status pending future inspections. The site was found in compliance with all other applicable standards.

May 15, 1986

Results of the 1st CWMB inspection were transmitted to the operator and LEA (attachment #1). The cover letter advised the operator of the nature of the CWMB evaluation program and the consequences of noncompliance.

July 21, 1986

A letter from the operator to Board staff regarding the CWMB inspection report of 5/15/86 was received (attachment #2). The operator made the following points:

17742 - Hazardous Waste
The operator assured staff that procedures had been amended to preclude the on-site incineration of hazardous wastes by local fire authorities as observed by CWMB inspector Richard Hill on 12/17/86.

17751 - Periodic Site Review
The operator outlined plans to conduct a Periodic Site Review of the facility after negotiations for additional site property were completed in December, 1986. The operator anticipated that the review would be completed by July, 1988.

Note: CAC Section 17751 (Periodic Site Review) requires a site review by a Registered Engineer once every five years from the date a permit is issued. At the time the operator wrote the above letter, his site was more than 2 years overdue for an engineering review. Furthermore, it had been over ten years since the site's last engineering review which was conducted in Novemeber, 1975, almost 4 years prior to securing the original operating permit.

July 24, 1986

The 2nd of three inspections by CWMB staff was conducted by Pam Badger. The following violations of CAC sections were documented:

17684 - Intermediate Cover
17704 - Leachate Control
17708 - Drainage and Erosion Control
17751 - Periodic Site Review

Site compliance with CAC Section 17705 (Gas Control) was given indeterminate status pending further investigation. The site was found in compliance with all other applicable standards.

August 8, 1986

The results of the 2nd CWMB inspection were transmitted to the operator and LEA (attachment #3). The cover letter advised the operator of the nature of the CWMB evaluation program and the consequences of noncompliance.

September 24, 1986

A letter from the operator to Board staff was received in response to the 2nd CWMB inspection on 8/8/86 (attachment #4). The operator made the following points:

17684 - Intermediate Cover
Equipment was inoperable on the day of the CWMB inspection. Hence, there was insufficient cover on some areas of the site.

Note: A site is required by CAC Section 17727 (Standby Equipment) to have access to enough standby equipment to meet cover requirements.

17704 - Leachate Control
The City of Whittier was in the process of contracting with a consulting firm to help the operator meet leachate control regulations.

17708 - Erosion Control
Erosion observed by the 2nd CWMB inspector on 7/24/86 did not expose waste and would promptly be corrected.

Note: Slides taken by the 2nd CWMB inspector on 7/24/86 show that erosion had exposed waste.

October 28, 1986

A written staff response to the operator's letter of 9/24/86 was sent (attachment #5). Staff thanked the operator for promising to correct violations documented on the 2nd CWMB inspection. Staff reiterated that the site was still in violation of CAC Section 17751 (Periodic Site Review).

December 29, 1986

The 3rd of three CWMB inspections was conducted by Jack Miller. The following violations of CAC sections were documented:

17616 - RDSI
17636 - Subsurface Records
17708 - Drainage and Erosion Control
17751 - Periodic Site Review

Although methane gas was found in the ground near on-site structures, a determination regarding site compliance with CAC Section 17705 (Gas Control) was deferred until a thorough investigation could be made. The site was found in compliance with all other applicable standards.

December 29, 1986

CWMB inspector, Jack Miller, was given a copy of a letter from the Southcoast AQMD to the operator indicating that the operator had applied to the AQMD for a permit to operate a gas control facility. However, the AQMD stated that more information was necessary before the permit application could be processed.

January 28, 1987

CWMB staff conducted a methane gas migration survey at the site. Gas was found at potentially explosive levels in two on-site structures. Gas was also found at 50% by volume of air in the ground within 75 feet of houses adjacent to the site perimeter (attachment #6). The site was found to be in violation of CAC Section 17705 (Gas Control).

February 11, 1987

The results of the 3rd CWMB inspection were transmitted to the operator and LEA (attachment #7). As determined by Board staff on 1/28/86, the facility was given a violation of CAC Section 17705 (Gas Control) in addition to the 4 other violations noted by Mr. Miller on 12/29/86. The cover letter informed the operator and the LEA of staff's intent to ask the Board to set a compliance schedule for the site at the Board's March meeting.

Summary:

The Savage Canyon Landfill has been evaluated by CWMB staff for compliance with State Minimum Standards. All pertinent information including data gathered during three staff inspections conducted since December 17, 1985 has been reviewed.

17705 - Gas Control

A methane gas monitoring and control problem has been identified at the site. CWMB staff found methane gas at potentially explosive concentrations in two on-site structures. Gas was also found at high concentrations in the ground within 75 feet of homes located on the site perimeter (see attachments #6 and #7 for specific details). CAC Section 17705 (Gas Control) requires an operator to monitor and control methane gas problems on site. Although the site operator has applied to the South Coast Air

Quality Management District for a permit to operate a gas control system, there is an immediate need to monitor and control gas in on-site structures. There is also an immediate need to determine the extent of methane gas migration off site where homes are located within 1,000 feet of the site perimeter.

17708 - Drainage and Erosion Control

During the 2nd and 3rd CWMB staff inspections, staff documented erosion along the east face of the fill area that had exposed considerable amounts of waste. This problem was caused by perimeter drainage being channeled down the face. There is an immediate need to re-route drainage in this area or install culverts to prevent erosion. There is an immediate need to cover all waste exposed by erosion. Other less serious erosion problems identified by CWMB staff are also in need of repair.

17751 - Periodic Site Review

The site has not undergone an engineering review since 1975. CAC Section 17751 (Periodic Site Review) requires that a facility's design, implementation, and operation plan be reviewed by a Registered Engineer every five years. Site operators have postponed a review until negotiations are completed to purchase an adjoining 45 acres needed for site expansion. However, the negotiations have been ongoing for several years and a successful outcome is not certain. The site has nearly exhausted its supply of on-site cover material. Without the cover material available on the adjacent 45 acres, operators will need to import cover from an off-site source. There is a need for operators to make contingency plans for obtaining additional cover material if negotiations for adjacent acreage fail or are not successful in the immediate future.

Board Options:

Option #1

Notify the operator of the Board's intent to place Savage Canyon Landfill on the State List of Non-Complying Facilities unless the following specified actions are taken within 90 days of notice.

Specified Actions:

17705 - Gas Control

1. Immediately establish a methane gas monitoring and control program for all on-site structures.

   A. Install gas warning and ventilating systems in all structures as necessary or devise a method for controlling gas migration into these buildings in order to eliminate any threat to public health or safety. Of particular concern is the Sammons Communication Relay Station in which CWMB staff measured methane gas at concentrations of 8% methane by volume of air on 1/29/87. Gas control system design, installation, and operation must meet all criteria established by the LEA and be concurred with by Board staff.

2. Plan and install a gas migration monitoring system along all site perimeters which are located within 1000 feet of off-site structures. The monitoring system design, installation, and operation must meet all criteria established by the LEA and be concurred with by Board staff.

3.* Construct a gas migration control system to mitigate against any threats to off-site structures as determined by the monitoring program outlined in #2 above.

17708 - Drainage and Erosion Control

1. Promptly repair areas along the east face of the fill where waste has been exposed by erosion.

2. Upgrade site drainage patterns and structures so as to preclude erosion problems in the future. The perimeter drain at the northeast corner of the upper landfill area must be re-routed so as not to drain over fill cover or a culvert must be installed over the fill surface.

17751 - Periodic Site Review

1. Cause the site to be reviewed by a Registered Engineer as outlined in CAC Section 17751. Particular emphasis should be given to developing a contingency plan for obtaining off-site cover material in case ongoing negotiations to purchase adjacent property for site expansion are not successful.

* Board staff realizes that 90 days may be insufficient time to complete the Specified Action marked with an asterisk. For this item, the operator must submit a compliance schedule for LEA and Board approval if a gas migration problem is identified. Failure

to meet any deadline contained in the agreed upon compliance schedule will result in a recommendation by staff that the Board place the site on the State List of Non-Complying Facilities. In no case will such a recommendation be made in less than 90 days. Verification of all deadlines will be made through additional staff inspections as necessary.

Option #2

Direct the operator to establish a schedule for bringing the site into compliance with State Minimum Standards.

Under this option, the operator must submit a compliance schedule to the Board within 30 days stating specific dates for initiating and completing the required actions outlined in Option #1 above. If an agreeable schedule is not received by the Board within 30 days, and/or if dates specified for implementing and completing the required actions are not met, this option authorizes the Chief Executive Officer to issue a 90-day notice of the Board's intent to place the site on the State List of Non-Complying Facilities.

Option #3

No Action.

Notification:

The site operator and LEA have been invited to present to the Board at its March meeting any information relevant to the matter under consideration.

Recommendation:

Based on the information available to staff at the time of the report, staff recommends that the Board implement Option #1.

Savage Canyon

Attachments

#1 1st CWMB Inspection Report, May 15, 1986.

#2 Operator responce to 1st CWMB Inspection Report, July 21, 1986.

#3 2nd CWMB Inspection Report, August 8, 1986.

#4 Operator response to 2nd CWMB Inspection Report, September 24, 1986.

#5 CWMB staff reply to attachment #4, October 28, 1986.

#6 CWMB staff report on methane gas survey at Savage Canyon, January 28, 1987.

#7 3rd CWMB Inspection Report, February 11, 1987.

Working File

STATE OF CALIFORNIA GEORGE DEUKMEJIAN, Governor

CALIFORNIA WASTE MANAGEMENT BOARD
1020 NINTH STREET, SUITE 300
SACRAMENTO, CA 95814

MAY 15 1986

1ST INSPEC 12/17/85
SENT 5/15/86

To: Louis Sandoval, Director
Public Services
13230 E. Penn Street
Whittier, CA 90602

Subject: Report of inspection: Savage Canyon Disposal Site 19-AH-001

Government Code Section 66796.38 requires the California Waste Management Board (Board) to conduct inspections of solid waste facilities for the purpose of evaluating compliance with the State Standards for Solid Waste Handling and Disposal (Title 14. California Administrative Code, Division 7 Chapter 3, commencing with section 17200). Under this program, each facility will be inspected at least three separate times. As you are aware by now, staff has already conducted one of these inspections at the subject facility. The date of that inspection was December 17, 1985. A report resulting from the recent inspection is enclosed. If photographs are referred to in the inspection report, copies will be obtainable upon written request.

The goal of our inspection program is to verify compliance with each of the State Minimum Standards, not merely to find violation(s) of these standards. In order to achieve this we will, as I stated above, be inspecting each facility at least three times. This will provide the following advantages over the previous inspection techniques:

* The program will provide greater fairness to operators of facilities by reducing the possibility that one operator will be inspected under adverse conditions and another under favorable conditions.

* The program will allow for evaluation of conditions, which show seasonal variations such as effectiveness of leachate control systems, vectors, dust, etc.

* The program will provide a track record of compliance which will be used in evaluating standards for which a single violation may not be sufficient reason to place the facility on the State List of Non-Complying Facilities when the facility is generally in compliance with that standard, i.e., the daily cover standard.

SAVAGE CANYON
ATTACHMENT #1 253

Although we do not intend to provide advance notice of the inspection dates to operators, the Local Enforcement Agency (LEA) will be notified of those dates, and will be invited to accompany our staff on the inspection.

If, after three inspections, your facility continues to be operating in violation of one or more of the State Minimum Standards you will be notified of this finding by certified letter. A copy of that letter will be sent to the LEA. After 90 days or upon notification of correction of all violations(s), Board staff will reinspect the facility. If the facility is still in violation, staff will notify you and the LEA, by certified letter of staff's intent to recommend that the Board place the facility's name on the State List of Non-Complying Facilities at a regularly scheduled meeting of the Board. Should the Board place the facility on that list, State law (Government Code 66796.39) requires that the LEA develop a compliance schedule for correction of the violation(s). If compliance is not achieved within one year, Government Code section 66796.39 directs LEAs to revoke facility operating permits. If the facility is closed or abandoned, staff will recommend that the LEA issue a notice of violation and an order to correct the violations. That Notice and Order will also notify you or the owner of the facility that State law provides that "the unremedied condition of the facility is prima facie evidence of negligence, and in any action for damages against the owner of the property for injury caused by the unremedied condition, the burden of proving the injury was not caused by an unremedied condition shall be on the owner of the property".

If you have any questions regarding the program, please contact me at (916) 322-1769.

Sincerely,

John K. Bell, Manager
Monitoring Section

cc: City of Whittier, Engineering Department

Los Angeles County Health Department

mea

SWIS-05 (REV. 1/85)

NOTICE OF INSPECTION
DISPOSAL SITE

LOCAL ENFORCEMENT AGENCY: L.A. County Health Dept.

FACILITY FILE NUMBER	PROGRAM CODE	INSPECTION DATE	T-OUT	
COUNTY 19	AHRCOLUMP	DATE 12/27/85	T-IN	DATE 8

FACILITY NAME: SAVAGE CANYON D.S.

FACILITY LOCATION:

INSPECTOR: R. Hill

ALSO PRESENT:

RECEIVED BY:

Operator _____

Owner _____

Comments: 17751 - 5 yr review due 3/26/84.

I = Indeterminate: See Monitoring Report.

See ALSO Monitoring Report of the SAME DATE

	V	C
(3011) RECORDS		☒
C ☐ ACCURATE WEIGHT/VOLUME RECORDS MAINTAINED 17636		
C ☐ ADEQUATE SUBSURFACE RECORDS MAINTAINED 17637		
C ☐ LOG OF SPECIAL OCCURRENCES MAINTAINED 17638		
C ☑ RECORDS AVAILABLE FOR INSPECTION 17639		
(3021) PERSONNEL		☒
C ☑ ADEQUATE NUMBER OF QUALIFIED PERSONNEL AVAILABLE 17646		
C ☑ PERSONNEL ADEQUATELY TRAINED 17647		
C ☑ ADEQUATE SUPERVISION PROVIDED 17648		
C ☐ SITE ATTENDANT AVAILABLE FULL-TIME OR AS DETERMINED BY LEA 17649		
(3031) SIGNS		☒
C ☐ IDENTIFICATION SIGNS AT EACH POINT OF ACCESS 17656		
C ☑ ENTRY SIGN STATES FEES, HOURS OF OPERATION, WASTES ACCEPTED/NOT ACCEPTED 17657		
C ☑ NON-HAZARDOUS UNATTENDED SITES HAVE SIGN WARNING USERS OF UNAVAILABILITY OF COMMUNICATION FACILITIES 17658		
(3041) SECURITY		☒
C ☑ ADEQUATE PERIMETER SECURITY, HAZARDOUS AREAS FENCED AND IDENTIFIED 17659		
(3051) ROADS		☒
C ☑ ACCESS ROADS HAVE SMOOTH SURFACE, MINIMIZE DUST AND TRACKING OF MUD, AND ALLOW ALL-WEATHER ACCESS 17639		
C ☑ INTERNAL ROADS IN SAFE CONDITION, PROVIDE ACCESS DURING INCLEMENT WEATHER, AND ARE PROVIDED WITH DIRECTIONS 17660		
(3071) SANITATION		☒
C ☐ ADEQUATE SANITARY FACILITIES AVAILABLE 17666		
C ☐ ADEQUATE DRINKING WATER AVAILABLE 17667		
(3081) COMMUNICATIONS		☒
C ☑ COMMUNICATION FACILITIES AVAILABLE WHERE HAZARDOUS WASTES ARE ACCEPTED 17668		
(3091) LIGHTING		☒
C ☑ LIGHTING ADEQUATE 17669		
(3101) SAFETY		☒
C ☑ SAFETY EQUIPMENT IN USE AND BEING WORN 17670		

	V	C
(3111) CONFINED UNLOADING		☒
C ☑ UNLOADING ADEQUATELY CONFINED 17676		
(3141) SPREADING/COMPACTING		☒
C ☑ SPREADING AND COMPACTION IN TWO-FOOT LAYERS 17677		
(3151) SLOPES/CUTS/GRADING		☒
C ☑ WORKING FACE SLOPES ALLOW EFFECTIVE COMPACTION, DEPTH OF CUTS AND SLOPES OF TRENCH SIDES AS APPROVED BY LEA 17678		
C ☑ FINAL SLOPES HAVE NEAT APPEARANCE AND ARE 1-3/4 : 1 OR FLATTER 17679		
C ☑ GRADING OF FILL SURFACES ADEQUATE 17710		
(3161) COVER		
C ☑ STOCKPILING OF COVER DOES NOT INTERFERE WITH OPERATIONS 17680		
C ☑ SUITABLE QUALITY AND SUPPLY OF COVER MATERIAL AVAILABLE 17681		
C ☑ COVER PROVIDED AT REQUIRED DEPTH AND FREQUENCY 17682		
I ☑ INTERMEDIATE COVER PROVIDED AT REQUIRED DEPTH AND FREQUENCY 17684		
☐ FINAL COVER PROVIDED AS REQUIRED 17685		
(3171) SALVAGING/PROCESSING		☒
C ☑ SCAVENGING PROHIBITED 17686		
C ☑ SALVAGING DOES NOT INTERFERE WITH OPERATIONS 17687		
C ☑ VOLUME REDUCTION AND ENERGY RECOVERY DO NOT INTERFERE WITH OPERATIONS OR CREATE HEALTH, SAFETY OR ENVIRONMENTAL PROBLEMS 17688		
C ☑ SALVAGING AND VOLUME REDUCTION CONFINED TO CLEARLY IDENTIFIED AREAS 17689		
C ☑ SALVAGE STORAGE LOCATION OR VOLUME AS APPROVED BY LEA, MINIMIZES FIRE, NUISANCE 17690		
C ☑ SALVAGE STORAGE TIME DOES NOT RESULT IN HEALTH OR FIRE PROBLEMS 17691		
C ☑ SALVAGED MATERIALS APPROVED BY LEA AND LOCAL HEALTH 17692		
(3181) NUISANCE		☒
C ☑ OPERATIONS DO NOT CREATE A PUBLIC NUISANCE 17701		
C ☑ FEEDING OF REFUSE TO ANIMALS FOR HUMAN CONSUMPTION		

	V	C
(3191) FIRE		☒
C ☐ FIRE CONTROL ADEQUATE 17693		
(3192) FIRE (P)		
☐ BURNING MATERIALS SPREAD AND EXTINGUISHED. LEA, SWMB NOTIFIED IMMEDIATELY OF FIRE NOT EXTINGUISHED IN 24 HOURS 17693	N/A	
(3201) LEACHATE		☒
C ☑ ADEQUATE STEPS TAKEN TO MONITOR, COLLECT, TREAT, AND DISPOSE OF LEACHATES 17704		
C ☑ NO WASTES IN DIRECT CONTACT WITH WATER EXCEPT AS APPROVED BY RWQCB 17709		
(3202) LEACHATE (P)		
☐ REFUSE COVERED WITH NEXT DAY'S REFUSE OR WITH SIX INCHES OF COMPACTED SOIL. TOTAL AREA OF EXPOSED REFUSE IS AS SPECIFIED FOR WET AND DRY SEASONS 17693	N/A	
(3211) GAS		
I ☐ GAS MONITORING AND CONTROL AS REQUIRED 17705		
(3221) DUST		☒
C ☑ DUST CONTROL ADEQUATE 17706		
(3231) VECTORS/BIRDS		☒
C ☑ VECTOR AND BIRD CONTROL ADEQUATE 17707		
C ☑ LIQUID PONDS MINIMIZE VECTOR PROPAGATION 17718		
(3232) VECTORS (P)		
☐ THRESHOLD VALUES FOR VECTOR POPULATIONS NOT EXCEEDED 17693	N/A	
(3241) DRAINAGE/EROSION		☒
C ☑ DRAINAGE AND EROSION CONTROL ADEQUATE 17708		
(3251) LITTER		☒
C ☑ LITTER CONTROL ADEQUATE 17711		
(3252) LITTER (P)		
☐ LITTER NOT ALLOWED TO MIGRATE OFF-SITE 17693	N/A	
(3261) NOISE		☒
C ☑ NOISE CONTROL ADEQUATE 17712		
(3271) ODOR		☒
C ☑ ODOR CONTROL ADEQUATE 17713		
(3272) ODOR (P)		
☐ AMBIENT AIR AT OR BEYOND FACILITY BOUNDARY IS NOT ODOROUS 17693		

	V	C
(3281) TRAFFIC		☒
C ☑ TRAFFIC CONTROL ADEQUATE WITHIN SITE. TRAFFIC MINIMIZES INTERFERENCE, SAFETY PROBLEMS, AND STACKING ON PUBLIC ROADS 17714		
(3291) EQUIPMENT		☒
C ☑ EQUIPMENT ADEQUATE IN TYPE, CAPACITY, AND NUMBER, AND IS ADEQUATELY MAINTAINED 17715		
C ☑ STANDBY EQUIPMENT AVAILABLE TO COMPLY WITH SEC. 17682 AND OTHER SECTIONS 17717		
(3301) MAINTENANCE		☒
C ☑ EFFECTIVE MAINTENANCE PROCEDURES AND PROGRAMS DEVELOPED AND UTILIZED 17731		
C ☑ ADEQUATE MONITORING AND REPAIR OF DETERIORATED CONDITIONS 17732		
(3311) CLOSURE		
☐ AFTER CLOSURE, IF LEACHATE, EXTENSIVE SURFACE CRACKING OR SETTLEMENT OCCURS, THE OWNER SHALL NOTIFY LEA AND SHALL MONITOR AND REPAIR SITE FOR A PERIOD OF 5 YEARS OR LONGER 17734	N/A	
☐ UPON SITE CLOSURE, DETAILED DESCRIPTION MUST BE FILED WITH THE LEA AND WITH THE COUNTY RECORDER 17735		
(3321) SPECIAL WASTES	☒	
C ☑ BURNING WASTES IMMEDIATELY SPREAD AND EXTINGUISHED IN SAFE AREA 17741		
V ☐ SITE ACCEPTS ONLY APPROVED HAZARDOUS WASTES AND TAKES PRECAUTIONS TO ELIMINATE OR CONTROL HARMFUL DUSTS, FUMES, MISTS, VAPORS, OR GASES 17742		
C ☑ LIQUID WASTES APPROVED BY RWQCB, LOCAL HEALTH ENTITY AND LEA 17743		
C ☑ DEAD ANIMALS ALLOWED BY LOCAL REGULATIONS 17744		
(3331) OTHER	☒	
☐ 17751 - 5 yr review violation		

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CALIFORNIA WASTE MANAGEMENT BOARD

DISPOSAL SITE
EVALUATION REPORT

Facility Name: Savage Canyon D.S. Facility ID No.:19-AH-001

Name of Inspector: Richard Hill Inspection Dates:Dec. 17, 1985

Signature: Richard E. Hill

CAC Section:	Observations:	Conclusions:
Disposal Site Information:		
17616 Report of Disposal Site Information	The RDSI addresses all the issues listed in section 17616.	Comply
Design Responsibility:		
17626 Design Responsibility	This is a grandfathered site.	N/A
17627 Ultimate Use	The ultimate use has been stated as recreational.	Comply
17628 General Design Parameters	The facility was grandfathered.	Comply
17629 Public Health Design Parameters	The site design did not appear likely to cause a public nuisance or safety hazard.	Comply

Section Manager JKB

Facility Name: Savage Canyon D.S. Facility ID No.:19-AH-001

Name of Inspector: Richard Hill Inspection Dates:Dec. 17, 1985

Signature: Richard E. Hill

CAC Section:	Observations:	Conclusions:
Disposal Site Records:		
17636 Weight/Volume Records	The records appeared sufficiently accurate to forecast the rate of site filling and for planning purposes.	Comply
17637 Subsurface Records	The operator has records showing where waste was placed and information on the depth of groundwater.	Comply
17638 Special Occurrences	A special occurrence log is kept and recent entries show a daily upkeep.	Comply
17639 Inspection of Records	Records were available upon request during normal business hours.	Comply
Disposal Site Personnel:		
17646 Availability	There was a gatekeeper, one equipment operator and a site supervisor on site during this inspection.	Comply
17647 Training	I did not observe operations that appeared to be inhibited by a lack of training.	Comply
17648 Supervision	There was a site supervisor on site during the inspection. The operation was adequately supervised.	Comply
17649 Site Attendant	The site was attended by a gatekeeper and a supervisor.	Comply
Disposal Site Improvements:		
17656 Identification Signs	Signs identified the site as city owned and listed operating hours.	Comply

Facility Name: Savage Canyon D.S. Facility ID No.:19-AH-001

Name of Inspector: Richard Hill Inspection Dates:Dec. 17, 1985

Signature: Richard E. Hill

CAC Section:	Observations:	Conclusions:
17657 Entry Signs	Appropriate entry signs were posted at the gatehouse.	Comply
17658 Site Security	I did not observe conditions which would indicate that unauthorized persons had access to the site.	Comply
17659 Access Roads	Access roads were smooth and provided all weather access. The roads were not likely to produce dust or cause tracking.	Comply
17660 Internal Roads	Internal roads appeared to be in a safe condition and allowed good access to the working face.	Comply
Disposal Site Health and Safety:		
17666 Sanitary Facilities	Sanitary facilities are located on site.	Comply
17667 Water Supply	City water is available on site.	Comply
17668 Communications Facilities	The site has radio communications with city offices. Phone #: 698-2551	Comply
17669 Lighting	There were no operations during periods of darkness during this inspection.	Comply
17670 Personnel Health And Safety	The LEA did not require special safety equipment.	Comply

Facility Name: Savage Canyon D.S. Facility ID No.:19-AH-001

Name of Inspector: Richard Hill Inspection Dates:Dec. 17, 1985

Signature: Richard E Hill

CAC Section:	Observations:	Conclusions:
Disposal Site Operations:		
17676 Confined Unloading	Unloading occurred in a clearly defined area and appeared reasonably confined.	Comply
17677 Spreading and Compacting	Loads were spread and compacted in an appropriate manner.	Comply
17678 Slopes and Cuts	The slope of the working face was not likely to cause poor compaction.	Comply
17679 Final Site Face	Final site faces appeared to have a neat and finished appearance.	Comply
17680 Stockpiling	Stockpiling did not interface with other site operations.	Comply
17681 Availability of Cover	There is a limited amount of cover on site. Cover from off site sources was being delivered during this inspection.	Comply
17682 Cover	Daily cover was accomplished.	Comply
17683 Performance Standards	The site uses daily cover rather than performance standards.	N/A
17684 Intermediate Cover	Future inspectors should verify that intermediate cover was applied to areas that do not receive waste for 180 days after this inspection.	Indeterminate

Facility Name: Savage Canyon D.S. Facility ID No.:19-AH-001

Name of Inspector: Richard Hill Inspection Dates:Dec. 17, 1985

Signature: Richard E Hill

CAC Section:	Observations:	Conclusions:
17685 Final Cover	The site is not closed.	N/A
17686 Scavenging	I did not observe scavenging.	Comply
17687 Salvaging Permitted	I did not observe salvage operations on site.	Comply
17688 Volume Reduction and Energy Recovery	Volume reduction and energy recovery were not observed.	Comply
17689 Processing Area	Processing was not observed on site.	Comply
17690 Storage of Salvage	Storage of salvage was not observed on site.	Comply
17691 Removal	Storage of salvage was not observed on site.	Comply
17692 Non-Salvageable Items	Non-salvageable items were not observed being salvaged.	Comply
Disposal Site Controls:		
17701 Nuisance Control	The operation did not appear likely to cause a public nuisance.	Comply
17702 Animal Feeding	I did not observe animals feeding on waste.	Comply

Facility Name: Savage Canyon D.S. Facility ID No.:19-AH-001

Name of Inspector: Richard Hill Inspection Dates:Dec. 17, 1985

Signature: Richard E Hill

CAC Section:	Observations:	Conclusions:
17703 Fire Control	Los Angeles County Fire Department personnel on site said that the site has adequate fire protection.	Comply
17704 Leachate Control	I did not observe leachate.	Comply
17705 Gas Control	I found gas concentrations at bar hole punch depth of up to 42% near the site perimeter and within 50 yards of offsite dwellings. The RDSI points out that the site is in an oil and natural gas rich region and natural gas seeps are common. I recommend that this site be studied by the Board's technical staff to determine whether the operation is the source of a public nuisance or health and safety hazard.	Indeterminat
17706 Dust Control	Minor amounts of dust were observed that did not appear likely to cause a public nuisance. A water truck was providing dust control.	Comply
17707 Vector and Bird Control	Few birds and no vectors were observed. The small number of birds seen were not likely to cause a public nuisance.	Comply

Facility Name: Savage Canyon D.S. Facility ID No.:19-AH-001

Name of Inspector: Richard Hill Inspection Dates:Dec. 17, 1985

Signature: Richard E Hill

CAC Section:	Observations:	Conclusions:
17708 Drainage and Erosion Control	Drainage and erosion control appeared adequate.	Comply
17709 Contact with Water	I did not see waste in contact with water.	Comply
17710 Grading of Fill Surfaces	Grading appeared adequate to account for settlement and to promote lateral runoff.	Comply
17711 Litter Control	I did not observe off site litter accumulations.	Comply
17712 Noise Control	I did not hear loud noises that were likely to cause a public nuisance.	Comply
17713 Odor Control	I did not smell odors on site.	Comply
17714 Traffic Control	I did not observe vehicles stacking on public roads.	Comply
17715 Ponded Liquid	I did not observe leachate collection ponds on site.	Comply
Disposal Site Equipment:		
17726 General	The operation was not inhibited by equipment.	Comply
17727 Standby Equipment	Backup equipment was available on site.	Comply

Facility Name: Savage Canyon D.S. Facility ID No.:19-AH-001

Name of Inspector: Richard Hill Inspection Dates:Dec. 17, 1985

Signature: Richard E Hill

CAC Section:	Observations:	Conclusions:
Disposal Site Maintenance:		
17731 General	Maintenance procedures appeared adequate.	Comply
17732 Operating Site Maintenance	The site appeared to be in reasonable repair.	Comply
17733 Insp. on Completion	The site is not closed.	N/A
17734 Completed Site Maintenance	The site is not closed.	N/A
17735 Recording	The site was grandfathered and has not closed.	N/A
Disposal Site Special Wastes:		
17741 Burning Wastes	There are areas available for spreading and extinguishing wastes.	Comply
17742 Hazardous Wastes	Los Angeles Sheriff and Los Angeles County Fire Department (LA Co. 103) personnel were on site burning hazardous chemicals they said came from Whittier College.	Violation

Facility Name: Savage Canyon D.S. Facility ID No.:19-AH-001

Name of Inspector: Richard Hill Inspection Dates:Dec. 17, 1985

Signature: Richard E Hill

CAC Section:	Observations:	Conclusions:
17743 Liquid Wastes	I did not observe liquid wastes received.	Comply
17744 Dead Animals	I did not observe dead animals received.	Comply
Disposal Site Reports and Reviews:		
17751 Periodic Site Review	The permit was issued 3/26/79. A five year review was due 3/26/84 and has not been completed.	Violation

Notes:

JUL 31 1986

CITY OF WHITTIER
13230 EAST PENN STREET, WHITTIER, CALIFORNIA 90602-1772 (213) 945-8200

July 21, 1986

Mr. John K. Bell, Manager
Monitoring Section
California Waste Management Board
1020 Ninth Street, Suite 300
Sacramento, CA 95814

Dear Mr. Bell:

Subject: Investigation of the Savage Canyon Disposal Site - 19-AH-001

This is in reference to your May 15, 1986 letter regarding the December 17, 1985 inspection of the Savage Canyon Sanitary Landfill.

The City's response to the two violations cited on the Notice of Inspection is as follows:

- 17742 - Hazardous Wastes

On one occasion, the L. A. County Sheriff's Bomb Squad, accompanied by the L. A. County Fire Department and the Whittier Police Department, brought two 5-gallon and six 1-quart metal containers of unstable ethyl ether to the landfill. The ether had been found at nearby schools and the bomb squad was directed to the landfill to detonate the material. According to Sgt. Shirley Farris of the L. A. County Sheriff's Department - Hazardous Materials Division, this was a life-threatening, highly dangerous situation and the bomb squad had to detonate the material as soon as possible in a suitable open area. At that time there was no mechanism in place for obtaining authorization to do this. However, according to Sgt. Farris, procedures have since been set up for public safety agencies to follow in situations such as this. The hazardous disposal violation cited was a one-time occurrence and will not happen again.

- 17751 - Periodic Site Review

* The City is now in the process of acquiring additional land for expansion of the landfill and should complete the acquisition by December, 1986. The additional land is included in the existing environmental documents and permits. There will be no substantial changes in the present landfill operations until the additional land is acquired and integrated into the operation of the landfill. As soon as the acquisition is resolved, we will commence the five-year Periodic Site Review. It is anticipated that the site review will be completed by July, 1988.

SAVAGE CANYON
ATTACHMENT # 2

If you have any questions regarding this, please free to contact Ann-Marie Hayashi of my staff at (213) 945-8200, Ext. 489.

Sincerely,

Louis F. Sandoval
Director of Public Services

LFS:AMH:smd

pc: Thomas Mauk, City Manager

4210-106

Working file

STATE OF CALIFORNIA GEORGE DEUKMEJIAN, Governor

CALIFORNIA WASTE MANAGEMENT BOARD
1020 NINTH STREET, SUITE 300
SACRAMENTO, CA 95814

AUG 08 1986

To: Mr. Tony Portolese, Superintendant
City of Whittier Sanitation Department
12016 East Hadley Street
Whittier, CA 90601

2nd INSPECTION
7/24/86
SENT 8/8/86

Subject: Report of inspection: Savage Canyon Landfill
19-AH-01

Government Code Section 66796.38 requires the California Waste Management Board (Board) to conduct inspections of solid waste facilities for the purpose of evaluating compliance with the State Standards for Solid Waste Handling and Disposal (Title 14. California Administrative Code, Division 7 Chapter 3, commencing with section 17200). Under this program, each facility will be inspected at least three separate times. As you are aware by now, staff has already conducted two of these inspections at the subject facility. The dates of those inspections were 12/17/85 and 7/24/86. A report resulting from the recent inspection is enclosed. If photographs are referred to in the inspection report, copies will be obtainable upon written request.

The goal of our inspection program is to verify compliance with each of the State Minimum Standards, not merely to find violation(s) of these standards. In order to achieve this we will, as I stated above, be inspecting each facility at least three times. This will provide the following advantages over the previous inspection techniques:

* The program will provide greater fairness to operators of facilities by reducing the possibility that one operator will be inspected under adverse conditions and another under favorable conditions.

* The program will allow for evaluation of conditions, which show seasonal variations such as effectiveness of leachate control systems, vectors, dust, etc.

* The program will provide a track record of compliance which will be used in evaluating standards for which a single violation may not be sufficient reason to place the facility on the State List of Non-Complying Facilities when the facility is generally in compliance with that standard, i.e., the daily cover standard.

SAVAGE CANYON
ATTACHMENT # 3

Although we do not intend to provide advance notice of the inspection dates to operators, the Local Enforcement Agency (LEA) will be notified of those dates, and will be invited to accompany our staff on the inspection.

If, after three inspections, your facility continues to be operating in violation of one or more of the State Minimum Standards you will be notified of this finding by certified letter. A copy of that letter will be sent to the LEA. After 90 days or upon notification of correction of all violations(s), Board staff will reinspect the facility. If the facility is still in violation, staff will notify you and the LEA, by certified letter of staff's intent to recommend that the Board place the facility's name on the State List of Non-Complying Facilities at a regularly scheduled meeting of the Board. Should the Board place the facility on that list, State law (Government Code 66796.39) requires that the LEA develop a compliance schedule for correction of the violation(s). If compliance is not achieved within one year, Government Code section 66796.39 directs LEAs to revoke facility operating permits. If the facility is closed or abandoned, staff will recommend that the LEA issue a notice of violation and an order to correct the violations. That Notice and Order will also notify you or the owner of the facility that State law provides that "the unremedied condition of the facility is prima facie evidence of negligence, and in any action for damages against the owner of the property for injury caused by the unremedied condition, the burden of proving the injury was not caused by an unremedied condition shall be on the owner of the property".

If you have any questions regarding the program, please contact me at (916) 322-1769.

Sincerely,

John K. Bell, Manager
Monitoring Section

cc: Mr. Chuck Coffee, Los Angeles County Health

Mr. Virgil Haight, Public Service Department - Whittier

mea

CALIFORNIA WASTE MANAGEMENT BOARD

DISPOSAL SITE
EVALUATION REPORT

Facility Name: Savage Canyon Disposal Site **Facility ID No.:** 19-AH-01

Name of Inspector: P. Badger **Inspection Dates:** 7/24/86

Signature: P. Badger

CAC Section:	Observations:	Conclusions:
Disposal Site Information:		
17616 Report of Disposal Site Information	The RDSI appeared to address all the issues outlined in section 17616. However, see the Notes section at the end of this report for discrepancies between the permitted and accepted tonnage or volume.	Comply
Design Responsibility:		
17626 Design Responsibility	This standard applies to new facilities only.	N/A
17627 Ultimate Use	The ultimate use has been designated as recreational.	Comply
17628 General Design Parameters	The site design accounted for all factors in Section 17628.	Comply
17629 Public Health Design Parameters	The design appeared to meet the criteria listed in Section 17629.	Comply

Section Manager DKB

Facility Name: Savage Canyon Disposal Site **Facility ID No.:**19-AH-01

Name of Inspector: P. Badger **Inspection Dates:**7/24/86

Signature: P. Badger

CAC Section:	Observations:	Conclusions:
17636 Weight/Volume	This site keeps daily, monthly, and annually tabulated volume records. Please see the Notes section of this report for a description of the discrepancy between permitted and accepted tonnage or volume.	Comply
17637 Subsurface Records	Subsurface records were maintained by the operator, as determined by Richard Hill in his December, 1985 inspection.	Comply
17638 Special Occurrences	A log of special occurrences was maintained. Daily entries are made in this log, which has been kept since 1983.	Comply
17639 Inspection of Records	Records were available during normal business hours.	Comply
Disposal Site Personnel:		
17646 Availability	There was only one equipment operator in the day of my inspection. There are supposed to be three. One of the three has retired. The next inspector should check that someone has been hired to take his place. This site will be hard pressed to prepare adequately for the rainy season without added personnel. Subsequent inspectors should consider a violation of this section if there has been no increase in equipment operators.	Indeterminate

Facility Name: Savage Canyon Disposal Site **Facility ID No.:**19-AH-01

Name of Inspector: P. Badger **Inspection Dates:**7/24/86

Signature: P. Badger

CAC Section:	Observations:	Conclusions:
17647 Training	Training was of the on-the-job type, and only experienced operators are hired. No activity appeared to be restricted by a lack of training.	Comply
17648 Supervision	There were supervisory personnel on site. I did not see any conditions I felt were due to a lack of supervision.	Comply
17649 Site Attendant	The site was attended during operating hours.	Comply
Disposal Site Improvements:		
17656 Identification Signs	I.D. signs contained the required information.	Comply
17657 Entry Signs	Entry signs contained the required information.	Comply
17658 Site Security	The site had a gate which was lockable. I did not observe evidence of unauthorized access to the facility.	Comply
17659 Access Roads	Roads were smooth and allowed good access to the site. I did not see excessive dust or tracking of waste onto public roads.	Comply
17660 Internal Roads	Internal roads were smooth and allowed good access to the unloading areas. Roads were suitably signed.	Comply
Disposal Site Health and Safety:		
17666 Sanitary Facilities	Sanitary facilities were available.	Comply

Facility Name: Savage Canyon Disposal Site **Facility ID No.:** 19-AH-01

Name of Inspector: P. Badger **Inspection Dates:** 7/24/86

Signature: P. Badger

CAC Section:	Observations:	Conclusions:
17667 Water Supply	Drinking water was supplied.	Comply
17668 Communications Facilities	There were phones on site. Phone #: (213) 698-2551.	Comply
17669 Lighting	This site does not operate during hours of darkness.	Comply
17670 Personnel Health and Safety	Heavy equipment is supplied with environmental cabs. Personnel are required to wear seat belts. First aid kits are supplied.	Comply
Disposal Site Operations:		
17676 Confined Unloading	The unloading area was very small for a landfill of this size.	Comply
17677 Spreading and Compacting	Waste was adequately spread and compacted to eliminate voids.	Comply
17678 Slopes and Cuts	The slope of the working face was of an angle that appeared to allow effective compaction by the type of vehicles used.	Comply
17679 Final Site Face	Final site faces had a neat and finished appearance and were of an acceptable slope.	Comply
17680 Stockpiling	Stockpiling did not interfere with other site activities.	Comply
17681 Availability of Cover	Cover was available on site.	Comply

Facility Name: Savage Canyon Disposal Site **Facility ID No.:**19-AH-01

Name of Inspector: P. Badger **Inspection Dates:**7/24/86

Signature: P. Badger

CAC Section:	Observations:	Conclusions:
17682 Cover	Daily cover was applied. (See slides # 1.2, 1.3, and 2.15.)	Comply
17683 Performance Standards	This was not a performance standard site.	N/A
17684 Intermediate Cover	There was some exposed waste on the south-east face which needs to be covered. (See slides # 1.9, 1.10, 1.12, and 2.7.)	Violation
17685 Final Cover	Areas of final cover did not have exposed waste.	Comply
17686 Scavenging	I did not observe any scavenging.	Comply
17687 Salvaging Permitting	There was no salvage operation on this site.	Comply
17688 Volume Reduction and Energy Recovery	Volume Reduction and Energy Recovery were not observed.	Comply
17689 Processing Area	There was no salvaging operation on this site.	Comply
17690 Storage of Salvage	There was no salvage operation on this site.	Comply
17691 Removal	There was no salvage operation on this site.	Comply
17692 Non-Salvageable Items	I did not observe the salvage of any items considered non-salvageable by this section.	Comply

Facility Name: Savage Canyon Disposal Site **Facility ID No.:** 19-AH-01

Name of Inspector: P. Badger **Inspection Dates:** 7/24/86

Signature: P. Badger

CAC Section:	Observations:	Conclusions:
Disposal Site Controls:		
17701 Nuisance Control	The operation did not appear to be likely to cause a public nuisance.	Comply
17702 Animal Feeding	I did not observe animals feeding on waste.	Comply
17703 Fire Control	The site had appropriate fire fighting equipment. I did not observe any fires or see evidence of recent fires.	Comply
17704 Leachate Control	This site had not yet submitted a proposal for compliance with Subchapter 15 and had no leachate monitoring or control system at the time of my inspection. They have located a consultant who has proposed to devise a system for them. Subsequent inspectors should check for progress in this process, which at the time of this writing is in the work-plan proposal stage. Significant progress may change this section to indeterminate status.	Violation
17705 Gas Control	As there are a number of residences and other enclosed structures well within 1000 feet of buried waste, this site should have a gas monitoring system. It has no such system, but is in the planning process for bidding out to gas developers the rights to the landfill gas. A successful bidder would be obliged to install a gas monitoring system compatible with Calderon legislation. I tested for methane at four points along the northwest and southwest perimeters and found no detectable gas at three points and 1% methane at the fourth point. Subsequent inspectors should monitor the progress of gas monitoring development and continue to test for gas at the perimeter. (See slide 2.11.)	Indeterminate

Facility Name: Savage Canyon Disposal Site **Facility ID No.:**19-AH-01

Name of Inspector: P. Badger **Inspection Dates:**7/24/86

Signature: P. Badger

CAC Section:	Observations:	Conclusions:
17706 Dust Control	A water truck was actively controlling dust. Minor amounts of dust observed were not likely to cause a public nuisance.	Comply
17707 Vector and Bird Control	I did not observe vectors on site. There were virtually no birds.	Comply
17708 Drainage and Erosion Control	There was some erosion on the southeast face of the fill that needs to be repaired before winter. Individual erosion points were not large but there were many of them. (See slides # 1.11, 2.3-2.5, and 2.9.)	Violation
17709 Contact with Water	I did not observe waste in contact with water.	Comply
17710 Grading of Fill Surfaces	Grading appeared to account for settlement and to promote lateral runoff.	Comply
17711 Litter Control	I did not observe accumulations of litter which were likely to cause a public nuisance.	Comply
17712 Noise Control	Noise levels did not seem likely to cause a public nuisance.	Comply
17713 Odor Control	I did not detect odors on or off site that were likely to cause a public nuisance.	Comply
17714 Traffic Control	Traffic flow did not appear likely to cause a public safety hazard and I did not observe vehicles stacking onto public roads.	Comply

Facility Name: Savage Canyon Disposal Site **Facility ID No.:**19-AH-01

Name of Inspector: P. Badger **Inspection Dates:**7/24/86

Signature: P. Badger

CAC Section:	Observations:	Conclusions:
17715 Ponded Liquid	This site did not have any ponded liquid.	Comply
Disposal Site Equipment:		
17726 General	The numbers and types of equipment on site were consistent with requirements listed in the RDSI.	Comply
17727 Standby Equipment	Adequate standby equipment was available on site.	Comply
Disposal Site Maintenance:		
17731 General	Equipment and facility maintenance programs appeared adequate.	Comply
17732 Operating Site Maintenance	Defective or deteriorated conditions were not observed.	Comply
17733 Insp. on Completion	The site has not closed.	N/A
17734 Completed Site Maintenance	The site has not closed.	N/A
17735 Recording	This site pre-exists the implementation of this standard.	Comply
Disposal Site Special Wastes:		
17741 Burning Wastes	I did not observe burning wastes. There was space available for spreading and extinguishing burning waste.	Comply

Facility Name: Savage Canyon Disposal Site **Facility ID No.:**19-AH-01

Name of Inspector: P. Badger **Inspection Dates:**7/24/86

Signature: P. Badger

CAC Section:	Observations:	Conclusions:
17742 Hazardous Wastes	I did not observe hazardous wastes received.	Comply
17743 Liquid Wastes	I did not observe any liquid waste disposal.	Comply
17744 Dead Animals	I did not observe dead animals being received.	Comply
Disposal Site Reports and Reviews:		
17751 Periodic Site Review	The current permit was issued in 1979. A five year review was due in 1984, and has not yet been completed. This site is overdue for a 5-year engineering site review and permit update.	Comply

Notes:

I was accompanied during portions of this inspection by Mr. Joe Chambers and Mr. Tony Portolese, both of the City of Whittier Sanitation Department. The weather was fair.

Article 2, Section 66796.30 of the Government Code requires a revised permit before a significant change occurs. This site took in an average of 1344 cubic yards per day during the first five months of 1986. Using the conversion factors used in the site EIR, this would correspond roughly to 720 TPD, or over twice the amount estimated received in the RDSI. The Permit and RDSI should be modified to reflect this tonnage discrepancy. This site is in violation of Section 66796.30 due to a significant increase in the amount of waste received.

The maintenance shed appeared to be rather crowded, and does not appear to be the same as described in the Report on Savage Canyon accompanying the permit.

SWRB-00 (REV. 1/83)

NOTICE OF INSPECTION DISPOSAL SITE

LOCAL ENFORCEMENT AGENCY: LA Dept. of Health Services
Whittier Public Services Dept.

T-OUT
T-IN

FACILITY NAME: Sunshine Canyon Disposal Site
FACILITY LOCATION: City of Whittier
INSPECTOR: Badger
ALSO PRESENT: T. Chambers

RECEIVED BY:
Operator
Owner

Comments: This site has only 1/2 of the equipment operators described in their Report of Disposal Site Information. There are several intermediate cover areas where waste is exposed. The site is delinquent in submitting a proposal for compliance with Subchapter 15 with the Waterboard. They should install a gas monitoring system as well. There was erosion on the southeast face of the fill. It appears that this site accepts much more waste than permitted for.
IND = indeterminate conclusion.

	*V	C
(3011) RECORDS		
☐ ACCURATE WEIGHT/VOLUME RECORDS MAINTAINED 17626		
☐ ADEQUATE SUBSURFACE RECORDS MAINTAINED 17627		
☐ LOG OF SPECIAL OCCURRENCES MAINTAINED 17628		
☐ RECORDS AVAILABLE FOR INSPECTION 17629		
(3021) PERSONNEL		
☐ ADEQUATE NUMBER OF QUALIFIED PERSONNEL AVAILABLE 17646 IND		
☐ PERSONNEL ADEQUATELY TRAINED 17647		
☐ ADEQUATE SUPERVISION PROVIDED 17648		
☐ SITE ATTENDANT AVAILABLE FULL-TIME OR AS DETERMINED BY LEA 17649		
(3031) SIGNS		
☐ IDENTIFICATION SIGNS AT EACH POINT OF ACCESS 17656		
☐ ENTRY SIGN STATES FEES, HOURS OF OPERATION, WASTES ACCEPTED/NOT ACCEPTED 17657		
☐ NON-HAZARDOUS UNATTENDED SITES HAVE SIGN WARNING USERS OF UNAVAILABILITY OF COMMUNICATION FACILITIES 17658		
(3041) SECURITY		
☐ ADEQUATE PERIMETER SECURITY, HAZARDOUS AREAS FENCED AND IDENTIFIED 17659		
(3051) ROADS		
☐ ACCESS ROADS HAVE SMOOTH SURFACE, MINIMIZE DUST AND TRACKING OF MUD, AND ALLOW ALL-WEATHER ACCESS 17660		
☐ INTERNAL ROADS IN SAFE CONDITION, PROVIDE ACCESS DURING INCLEMENT WEATHER, AND ARE PROVIDED WITH DIRECTIONS 17661		
(3071) SANITATION		
☐ ADEQUATE SANITARY FACILITIES AVAILABLE 17666		
☐ SAFE ADEQUATE DRINKING WATER AVAILABLE 17667		
(3081) COMMUNICATIONS		
☐ COMMUNICATION FACILITIES AVAILABLE WHERE HAZARDOUS WASTES ARE ACCEPTED 17668		
(3091) LIGHTING		
☐ LIGHTING ADEQUATE 17669		
(3101) SAFETY		
☐ SAFETY EQUIPMENT IN USE AND BEING WORN 17670		

	V	C
(3111) CONFINED UNLOADING		
☐ UNLOADING ADEQUATELY CONFINED 17676		
(3141) SPREADING/COMPACTING		
☐ SPREADING AND COMPACTION IN TWO-FOOT LAYERS 17677		
(3151) SLOPES/CUTS/GRADING		
☐ WORKING FACE SLOPES ALLOW EFFECTIVE COMPACTION. DEPTH OF CUTS AND SLOPES OF TRENCH SIDES AS APPROVED BY LEA 17678		
☐ FINAL SLOPES HAVE NEAT APPEARANCE AND ARE 1-3/4 : 1 OR FLATTER 17679		
☐ GRADING OF FILL SURFACES ADEQUATE 17710		
(3161) COVER		
☐ STOCKPILING OF COVER DOES NOT INTERFERE WITH OPERATIONS 17680		
☐ SUITABLE QUALITY AND SUPPLY OF COVER MATERIAL AVAILABLE 17681		
☐ COVER PROVIDED AT REQUIRED DEPTH AND FREQUENCY 17682		
☒ INTERMEDIATE COVER PROVIDED AT REQUIRED DEPTH AND FREQUENCY 17684		
☐ FINAL COVER PROVIDED AS REQUIRED 17683		
(3171) SALVAGING/PROCESSING		
☐ SCAVENGING PROHIBITED 17686		
☐ SALVAGING DOES NOT INTERFERE WITH OPERATIONS 17687		
☐ VOLUME REDUCTION AND ENERGY RECOVERY DO NOT INTERFERE WITH OPERATIONS OR CREATE HEALTH, SAFETY OR ENVIRONMENTAL PROBLEMS 17688		
☐ SALVAGING AND VOLUME REDUCTION CONFINED TO CLEARLY IDENTIFIED AREAS 17689		
☐ SALVAGE STORAGE LOCATION OK, VOLUME AS APPROVED BY LEA, MINIMIZES FIRE, NUISANCE 17690		
☐ SALVAGE STORAGE TIME DOES NOT RESULT IN HEALTH OR FIRE PROBLEMS 17691		
☐ SALVAGED MATERIALS APPROVED BY LEA AND LOCAL HEALTH 17692		
(3181) NUISANCE		
☐ OPERATIONS DO NOT CREATE A PUBLIC NUISANCE 17701		
☐ FEEDING OF REFUSE TO ANIMALS FOR HUMAN CONSUMPTION PROHIBITED 17702		

	V	C
(3191) FIRE		
☐ FIRE CONTROL ADEQUATE 17703		
(3192) FIRE (P)		
☐ BURNING MATERIALS SPREAD AND EXTINGUISHED. LEA, SWRB NOTIFIED IMMEDIATELY OF FIRE NOT EXTINGUISHED IN 24 HOURS 17683		
(3201) LEACHATE		
☒ ADEQUATE STEPS TAKEN TO MONITOR, COLLECT, TREAT, AND DISPOSE OF LEACHATES 17704		
☐ NO WASTES IN DIRECT CONTACT WITH WATER EXCEPT AS APPROVED BY RWQCB 17705		
(3202) LEACHATE (P)		
☐ REFUSE COVERED WITH NEXT DAY'S REFUSE OR WITH SIX INCHES OF COMPACTED SOIL. TOTAL AREA OF EXPOSED REFUSE IS AS SPECIFIED FOR WET AND DRY SEASONS 17693		
(3211) GAS		
☐ GAS MONITORING AND CONTROL AS REQUIRED 17708 IND		
(3221) DUST		
☐ DUST CONTROL ADEQUATE 17709		
(3231) VECTORS/BIRDS		
☐ VECTOR AND BIRD CONTROL ADEQUATE 17707		
☐ LIQUID PONDS MINIMIZE VECTOR PROPAGATION 17712		
(3232) VECTORS (P)		
☐ THRESHOLD VALUES FOR VECTOR POPULATIONS NOT EXCEEDED 17693		
(3241) DRAINAGE/EROSION		
☒ DRAINAGE AND EROSION CONTROL ADEQUATE 17706		
(3251) LITTER		
☐ LITTER CONTROL ADEQUATE 17711		
(3252) LITTER (P)		
☐ LITTER NOT ALLOWED TO MIGRATE OFF-SITE 17692		
(3261) NOISE		
☐ NOISE CONTROL ADEQUATE 17713		
(3271) ODOR		
☐ ODOR CONTROL ADEQUATE 17714		
(3272) ODOR (P)		
☐ AMBIENT AIR AT OR BEYOND FACILITY BOUNDARY IS NOT OBNOXIOUS 17683		

	V	C
(3281) TRAFFIC		
☐ TRAFFIC CONTROL ADEQUATE WITHIN SITE. TRAFFIC MINIMIZES INTERFERENCE, SAFETY PROBLEMS, AND STACKING ON PUBLIC ROADS 17714		
(3291) EQUIPMENT		
☐ EQUIPMENT ADEQUATE IN TYPE, CAPACITY, AND NUMBER, AND IS ADEQUATELY MAINTAINED 17725		
☐ STANDBY EQUIPMENT AVAILABLE TO COMPLY WITH SEC. 17652 AND OTHER SECTIONS 17717		
(3301) MAINTENANCE		
☐ EFFECTIVE MAINTENANCE PROCEDURES AND PROGRAMS DEVELOPED AND UTILIZED 17731		
☐ ADEQUATE MONITORING AND REPAIR OF DETERIORATED CONDITIONS 17732		
(3311) CLOSURE		
☐ AFTER CLOSURE, IF LEACHATE, EXTENSIVE SURFACE CRACKING OR SETTLEMENT OCCURS, THE OWNER SHALL NOTIFY LEA AND SHALL MONITOR AND REPAIR SITE FOR A PERIOD OF 5 YEARS OR LONGER 17734		
☐ UPON SITE CLOSURE, DETAILED DESCRIPTION MUST BE FILED WITH THE LEA AND WITH THE COUNTY RECORDER 17735		
(3321) SPECIAL WASTES		
☐ BURNING WASTES IMMEDIATELY SPREAD AND EXTINGUISHED IN SAFE AREA 17741		
☐ SITE ACCEPTS ONLY APPROVED HAZARDOUS WASTES AND TAKES PRECAUTIONS TO ELIMINATE OR CONTROL HARMFUL DUSTS, FUMES, MISTS, VAPORS, OR GASES 17742		
☐ LIQUID WASTES APPROVED BY RWQCB, LOCAL HEALTH ENTITY AND LEA 17743		
☐ DEAD ANIMALS ALLOWED BY LOCAL REGULATIONS 17744		
(3331) OTHER		
☐		

*V = Violation
C = Compliance

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DISTRIBUTION: WHITE — CEMB YELLOW — OPERATOR PINK — LEA

CITY OF WHITTIER
13230 EAST PENN STREET, WHITTIER, CALIFORNIA 90602 (213) 945-8200

September 24, 1986

Mr. John K. Bell, Manager
Monitoring Section
California Waste Management Board
1020 Ninth Street, Suite 300
Sacramento, CA 95814

Dear Mr. Bell:

Subject: Investigation of the Savage Canyon Disposal Site - 19-AH-01

This is in reference to your August 8, 1986 letter regarding the July 24, 1986 inspection of the Savage Canyon Sanitary Landfill.

The City's response to the three violations cited on the Notice of Inspection is as follows:

° 17684 - Intermediate Cover

At the time of the investigation, both scrapers were down for repair work, one for an extensive brake job. However, it is our policy to stockpile 2-3 days worth of cover in case of equipment failure and therefore there was sufficient dirt on hand to cover the waste. It was not an open dump situation.

° 17704 - Leachate Control

The City's technical advisor in this area recently discontinued his practice, and the City has begun to work with another consulting firm. We are currently in the work-plan proposal stage.

° 17708 - Erosion Control

As stated earlier, both scrapers were down for repair work at the time of the investigation. Although there was minor erosion, no refuse was exposed. The erosion will be controlled prior to winter.

The Report of Investigation includes a note by the inspector of a possible violation of Section 66796.30. The inspector used the conversion factors in the site EIR and calculated that the site is receiving tonnage in excess of the amount estimated received in the RDSI.

SAVAGE CANYON
ATTACHMENT #4

Whittier Centennial 100 Years of Service with Pride!

It seems the inspector was misled by the EIR's conversion factors and interpreted the in-place density given to be the density of refuse as it is delivered to the landfill. Using the attached conversion factors from SCS Engineers, it is clear that the landfill is operating well within its permitted tonnage limits.

If you have any questions regarding this, please free to contact Ann-Marie Hayashi of my staff at (213) 945-8200, Ext. 489.

Sincerely,

Ann Marie Hayashi

for Louis F. Sandoval
Director of Public Services

LFS:AMH:rdf

pc: Thomas Mauk, City Manager

4210-126

SCS ENGINEERS
STEARNS, CONRAD AND SCHMIDT
CONSULTING ENGINEERS, INC.

4014 LONG BEACH BOULEVARD
LONG BEACH, CALIFORNIA 90807-2687
(213) 426-9544

ROBERT P. STEARNS, PE
E.T. CONRAD, PE

Roderick A. Carr
Miles J. Haven
Michael W. McLaughlin
Gary L. Mitchell, PE
David E. Ross, PE
William L. Schubert
James J. Walsh, PE

86 SEP 22 AM: 11

September 19, 1986
File No. 18607.00

Mr. Louis Sandoval
City of Whittier
13230 Penn Street
Whittier, California 90602

Subject: Waste Delivery Volumes to the Savage Canyon Landfill Site, Whittier, California

Gentlemen:

Per your request, we have prepared the following response to the conclusion of the California Waste Management Board (CWMB) that the city's Savage Canyon Landfill is receiving waste quantities in excess of those allowed per the site operating permit.

Reference is made to the Notes section (Page 9) of the Report of Inspection: Savage Canyon Landfill 19-AH-01, conducted by Inspector P. Badger of the CWMB. In this section, it states that the site is in violation of Section 66796.30 of the Government Code due to a significant increase in the amount of waste received (720 tpd versus the permitted 300 to 350 tpd). This conclusion is based on the fact that the site took in an average of 1,344 cu yd of waste per day during the first 5 months of 1986, and the assumption that the density of incoming waste was the same as the in-place waste density stated in the site's EIR on Page II-1 (approximately 1,075 lb per cu yd).

We believe that Inspector Badger erred by interpreting the in-place density given in the EIR to be the density of refuse as it is delivered to the landfill.

Attachment 1 presents two ways of estimating the total weight of refuse as it is delivered to the Savage Canyon Landfill. As can be seen, even when using numbers which are conservative, the Savage Canyon Landfill is still operating well within its permitted tonnage limits.

We trust that this response will meet your needs. If you have any questions, please contact Ray Grier or me.

Very truly yours,

Thomas D. Wright

Thomas D. Wright, P.E.
Senior Project Engineer
SCS ENGINEERS

TDW:rwb

ATTACHMENT 1

METHODS OF ESTIMATING WASTE INPUT INTO WHITTIER LANDFILL

1. Given:

   - Population of Whittier = 70,000 persons

   - Per capita waste generation of 6 to 8 lb/person/day (national average for all waste types including residential, commercial, and industrial). Use 8 lb/person/day to be conservative.

   Then:

$$\frac{70{,}000 \text{ persons} \times 8 \text{ lb/person/day}}{2{,}000 \text{ lb/ton}}$$

$$= 280 \text{ tons/day, 7 days/week.}$$

However, the landfill is open only 6 days/week. Thus:

$$\frac{280 \text{ tons/day} \times 7 \text{ days/week}}{6 \text{ days/week}} = 327 \text{ tons/day, 6 days/week}$$

2. Given:

   - Average daily waste volume received at the site = 1,344 cu yd.

   - Of the 1,344 cu yd delivered to the site, an average of 100 cu yd/day was solid fill (soil, demolition debris, etc.). The assumed density of this material is 3,000 lb/cu yd.

   - The remaining 1,244 cu yd of waste is assumed to have an average density of 300 lb/cu yd. This includes waste delivered in private vehicles and packer trucks having waste densities ranging from 100 to 200 lb/cu yd and up to 700 to 800 lb/cu yd, respectively.

   Then:

   - Solid fill:

$$\frac{100 \text{ cu yd/day} \times 3{,}000 \text{ lb/cu yd}}{2{,}000} = 150 \text{ tons/day}$$

- Remaining waste:

$$\frac{1{,}244 \text{ cu yd/day} \times 300 \text{ lb/cu yd}}{2{,}000} = 187 \text{ tons/day}$$

- Total:

$$150 + 187 \text{ (tons/day)} = 337 \text{ tons/day}$$

STATE OF CALIFORNIA

GEORGE DEUKMEJIAN, Governor

CALIFORNIA WASTE MANAGEMENT BOARD
1020 NINTH STREET, SUITE 300
SACRAMENTO, CA 95814

OCT 28 1986

Mr. Louis F. Sandoval, Director
Public Services
City of Whittier
13230 East Penn Street
Whittier, CA 90602-1772

Subject: Savage Canyon Disposal Site - 19-AH-001

Dear Mr. Sandoval:

We received your letter of September 24, 1986, concerning the Savage Canyon Disposal Site, 19-AH-001. Landfill operation is complicated, and unexpected events can occur, such as the loss of function of the scraper during our 2nd inspection of your site. We have expanded our program beyond a single inspection because more frequent inspections can help determine whether problems at a site are temporary or chronic. Hopefully at our next inspection your site will have no problems with Intermediate Cover (Section 17684) or Erosion Control (Section 17708).

Efforts on your part will be taken into account when our next inspector examines progress on developing and installing leachate and groundwater monitoring and control systems since the last inspection.

The conversion factors described in the September 19, 1986 letter from SCS engineers will be used from this point forward in our calculation of site tonnage accepted.

In reviewing our second inspection report of your landfill, it was noted that although the text of Section 17751, Periodic Site Review, indicates a second violation, the conclusion was inadvertently recorded as compliance. This section should be regarded to be in violation.

In reference to your letter of July 21, 1986, the standard referred to, Section 17742, Hazardous Wastes, was found to be in compliance at the July 24, 1986 inspection.

We are confident that the City of Whittier is addressing the problems noted in our recent Presley inspection. We look forward to a violation-free third inspection.

Sincerely,

SIGNED AND SENT

John K. Bell, Manager
Monitoring Section

SAVAGE CANYON

ATTACHMENT # 5

284

State of California

Memorandum

To: Kerry Jones

Date: 2/5/87

From: Herb Berton
Herb Berton

California Waste Management

Subject: Gas monitoring at Savage Canyon Landfill (19-AH-01)

On January 28, 1987, John Bell, Barry McGee, and I monitored for landfill gas migration into nearby buildings at Savage Canyon Landfill (19-AH-01) in Whittier, CA to resolve an indeterminate status for Section 17705, CAC Title 14. The following tables summarize our findings:

Organic Vapor Analyzer

Location	Reading (Background)
1. Locked gate in rifle pit	275-300ppm
2. Crack in concrete in above	250-300ppm
3. Inside range house	0 ppm
4. Cracks in floor of maintenance building	500-1000ppm
5. * Sammons Communications Satellite Receiving Station	150-160ppm
6. Floor cracks in satellite receiving station	>10,000 ppm

Gas Tech

Location	Reading	Remarks
7. Three feet east of crane in maint. bldg.	8%	1' deep
8. Three feet north of crane in maint. bldg.	1%	2' deep
9. Five feet east of maint. bldg.	0.1%	2' deep
10. Twenty feet east of maint. bldg.	41%	4' deep
11. Ten feet east of crane in maint. bldg.	20%	2' deep
12. Ten feet east of Sammons Communications Bldg.	55%	2' deep
13. Under equipment rack (extreme right)	8%	high scale
14. " " " " " "	7.2%	w/ dilutor
15. Final cover area 50 feet from house	52%	4' deep

Immediately south of the satellite communication building were two water tanks. The location of these tanks may allow landfill gas to permeate into these tanks which may necessitate further testing, by the LEA, of the water for dissolved gases. Whittier College is southwest of the landfill and may use these tanks as a source of water.

SAVAGE CANYON

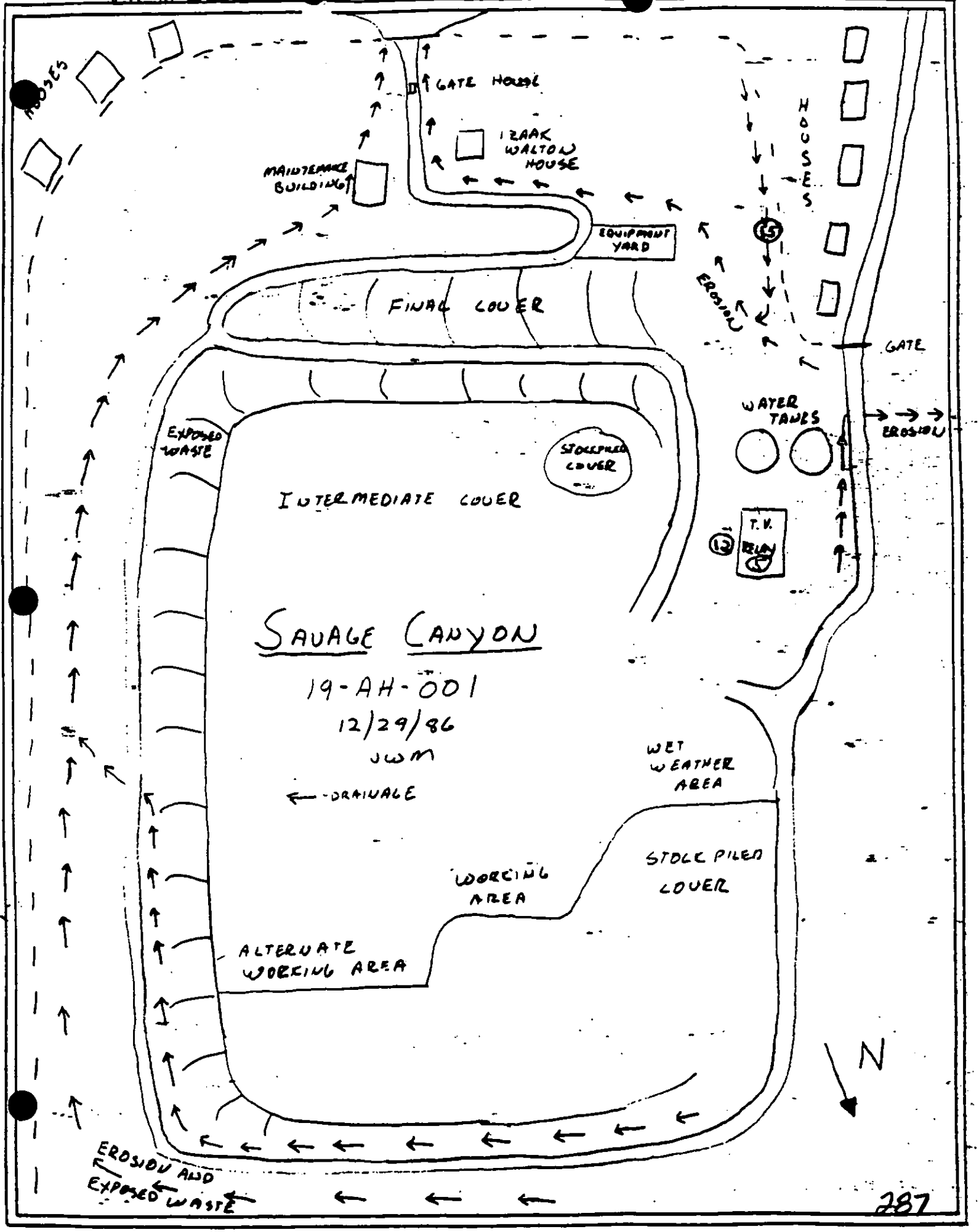
ATTACHMENT #6

Memorandum - cont.

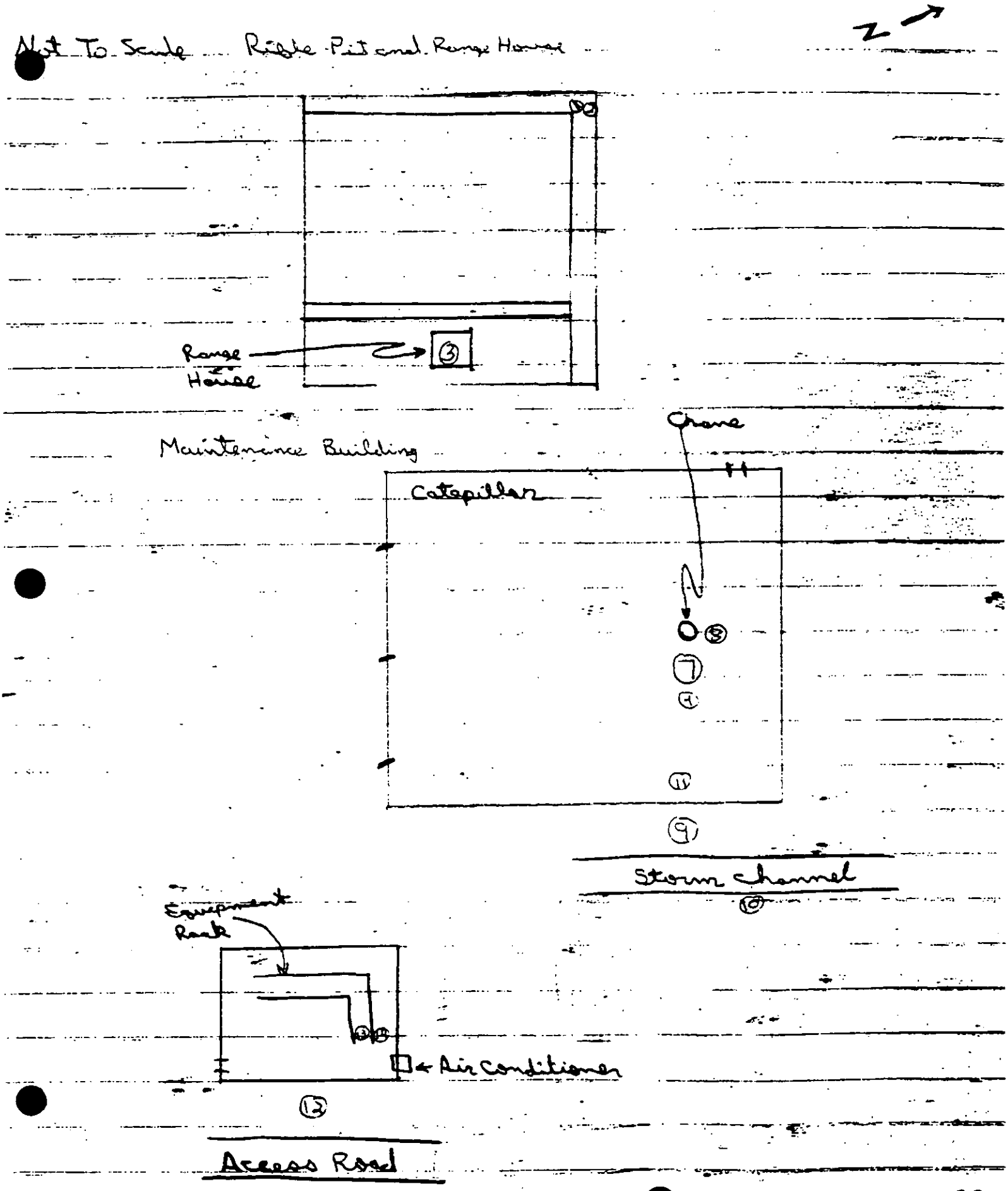
Please see the attached map for location of structures and areas where monitoring was conducted.

*The background level of 150-160 ppm in the Sammons Communications Satellite Receiving Station was recorded with the door open and a breeze blowing.

Not To Scale


HOUSES
GATE HOUSE
IZAAK WALTON HOUSE
MAINTENANCE BUILDING
HOUSES
EQUIPMENT YARD
15
EROSION
FINAL COVER
GATE
WATER TANKS
EROSION
EXPOSED WASTE
STOCKPILED COVER
INTERMEDIATE COVER
T.V. BLDG
12
SAVAGE CANYON
19-AH-001
12/29/86
JWM
DRAINAGE
WET WEATHER AREA
STOCK PILED COVER
WORKING AREA
ALTERNATE WORKING AREA
N
EROSION AND EXPOSED WASTE

Not To Scale ... Rifle Pit and Range House



working file

STATE OF CALIFORNIA

GEORGE DEUKMEJIAN, Governor

CALIFORNIA WASTE MANAGEMENT BOARD
020 NINTH STREET, SUITE 300
ACRAMENTO, CA 95814

FEB 11 1987

To: Mr. Tony Portolese, Superintendent
City of Whittier Sanitation Department
12016 East Hadley Street
Whittier, CA 90601

Subject: Report of Inspection: Savage Canyon Landfill (19-AH-001)

Government Code Section 66796.38 requires the California Waste Management Board (Board) to conduct inspections of solid waste facilities for the purpose of evaluating compliance with the State Standards for Solid Waste Handling and Disposal (Title 14. California Administrative Code, Division 7 Chapter 3, commencing with section 17200). Under this program, each facility will be inspected at least three separate times. As you are probably aware, the subject facility received its third inspection on December 29, 1986. Enclosed please find the Evaluation Report resulting from this third inspection. Copies of photographs or slides referred to in the report are available from the Board upon written request.

Results of the three field inspections along with all pertinent supporting data in our files have now undergone staff review. A final staff report is currently being prepared and will be sent to you as soon as possible. We are concerned with the following repeated and/or uncorrected violations of State Minimum Standards:

17616 - RDSI (ongoing)

17705 - Gas Control (ongoing)

17708 - Drainage and Erosion Control (repeated)

17751 - Periodic Site Review (ongoing)

At the March meeting of the California Waste Management Board tentatively scheduled for March 26 and 27, 1987, staff will report on its evaluation of the subject facility. Staff will recommend that the Board direct you to take specific corrective actions to gain compliance with State Minimum Standards. If the Board accepts this recommendation, you will be directed to submit a letter to the Board within 30 days stating specific dates for initiating and completing the corrective actions.

If this letter is not received by the Board within 30 days, or if the dates for implementing the required actions are not met,

SAVAGE CANYON
ATTACHMENT #7 289

progress towards compliance will be deemed unsatisfactory. Verification of all deadlines will be made through additional staff inspections as necessary. If at any time progress is deemed unsatisfactory, a 90 day notice will be issued by the Chief Executive Officer stating the Board's intent to place the site on the State List of Non-Complying Facilities.

You should be aware that the Board may direct staff to issue a 90 day notice of it's intent to list the site rather than allow for additional time for compliance as recommended by staff.

You are invited to address the Board with any information you feel the Board should consider at it's March meeting. A notice of the meeting will be sent at least 10 days prior to the scheduled date.

A copy of this letter and the enclosed report will be sent to the LEAs. If you have any questions regarding this program, please contact me at (916) 322-1769

Sincerely,

John K. Bell

John K. Bell, Manager
Monitoring Section

Enclosure

cc Chuck Coffee, L.A. County Health Services

Virgil Haight, Whittier Public Service Department

mea

CALIFORNIA WASTE MANAGEMENT BOARD

SOLID WASTE FACILITY
EVALUATION REPORT

Facility Name: Savage Canyon

Facility ID No.: 19-AH-001

Name of Inspector: Jack Miller

Inspection Dates: 12/29/86

Signature: Jack W. Miller

LEGEND

C = Compliance
V = Violation
I = Indeterminate
N = Not Applicable

CAC	SECTION	OBSERVATIONS	RESULT
		DISPOSAL SITE INFORMATION	
17616	Report of Disposal Site Information.	The following differences were observed between operations as described in the facility RDSI dated 3/26/86 and those actually occurring at the site: 1) The existence and operation of the on-site television signal relay station is not described. 2) Existence and operation of the the on-site Izaak Walton League meeting house and Junior Marksman Range is not described.	V
		DESIGN RESPONSIBILITY.	
17626	Design Responsibility	This standard only applies to new facilities.	N

Section Manager JKS

CAC	SECTION	OBSERVATIONS	RESULT
17627	Ultimate Use.	This standard only applies to new facilities permitted after 1975. This site commenced operations in 1930.	N
17628	General Design Parameters.	This standard only applies to new facilities permitted after 1975. This site commenced operations in 1930.	N
17629	Public Health Design Parameters	This standard only applies to new facilities permitted after 1975. This site commenced operations in 1930.	N
		DISPOSAL SITE RECORDS.	
17636	Weight/Volume Records.	An attendant at the gatehouse estimated and recorded the volume of incoming waste loads. In a letter to CWMB staff on 9/24/86, Louis M. Sandoval, Director of Whittier City Public Services, provided a daily tonnage estimate for the site of 337 tons per day. The Solid Waste Permit allows 350 tons per day. Note: Joe Chambers, Site Supervisor, estimated that the site received 425 to 450 tons of waste per day.	C
17637	Subsurface Records.	Records regarding the length and depth of cuts made in natural terrain where fill was or would be placed were not maintained. The Report on Savage Canyon Landfill (SCS Engineers, November 1975) states that except for some perched water tables, groundwater is 100 feet below the landfill. The Savage Canyon Sanitary Landfill Expansion EIR (Engineering Sciences Inc., April, 1977) states that no groundwater is present at the landfill site. There were no groundwater monitoring wells at the site to determine depth to groundwater.	V

Inspector: Jack W. Miller

CAC	SECTION	OBSERVATIONS	RESULT
17638	Special Occurrences.	I reviewed a log of special occurrences maintained by Joe Chambers, Site Supervisor, and kept in the site maintenance building.	C
17639	Inspection of Records.	Existing records were made available for my inspection at the site gatehouse and at City Hall on 12016 E. Hadley Street, Whittier, CA.	C
		DISPOSAL SITE PERSONNEL.	
17646	Availability.	No site operation was observed to be limited by a lack of personnel. Joe Chambers, Site Supervisor, stated that the site had one supervisor, one gate attendant, and three equipment operators. This staffing includes one more equipment operator than outlined in the RDSI. The operator who had retired prior to the 2nd CWMB inspection had been replaced.	C
17647	Training.	Joe Chambers, Site Supervisor, stated that new employees receive on-the-job training.	C
17648	Supervision.	Joe Chambers, Site Supervisor, was on site during the inspection. I did not observe any problems related to a lack of site supervision.	C
17649	Site Attendant.	I observed that Joe Chambers, Site Supervisor, and the equipment operators regularly checked the public unloading area.	C
		DISPOSAL SITE IMPROVEMENTS.	
17656	I.D. Signs.	The public access point at 13919 E. Penn Street, Whittier, CA was identified with a sign indicating the name of the site and it's operator (Slide 1).	C

Inspector: Jack W. Miller

CAC	SECTION	OBSERVATIONS	RESULT
17657	Entry Signs.	Signs indicating the hours of operation, schedule of charges, and types of waste not accepted were posted at the main entrance and gatehouse (Slides 1, 2, 5).	C
17658	Site Security.	Unauthorized entry by vehicles or persons was discouraged by fences and topographical constraints. The main and side entrances were secured by lockable gates (See attached site map) (Slides 4, 14).	C
17659	Access Roads.	The main access road was paved and in good repair. I did not observe waste or dirt tracked onto public streets. Dust was not a problem (Slide 4).	C
17660	Internal Roads.	The main internal road was paved to the top of the site (Slides 20, 25, 26, 44). Other internal roads were surfaced with graded dirt and allowed good access to the unloading area (Slides 31, 42, 43). Internal roads were suitably signed.	C
		DISPOSAL SITE HEALTH AND SAFETY.	
17666	Sanitary Facilities.	I observed sanitary facilities near the site maintenance building (Slide 51).	C
17667	Water Supply.	Drinking water was available in the site maintenance building.	C
17668	Communication Facilities.	A telephone was available at the site gatehouse. The number was (213) 945-8242.	C
17669	Lighting.	Site operating hours were between 7:30 a.m. and 5:30 p.m. I did not observe any indication that site operations were conducted during hours of darkness.	C
17670	Personnel Health and Safety.	Specific items of safety equipment were not required by the Local Enforcement Agency.	C

Inspector: Jack W. Miller

CAC	SECTION	OBSERVATIONS	RESULT
		DISPOSAL SITE OPERATIONS.	
17676	Confined Unloading.	Unloading was confined to an area 75 feet wide at the toe of the working face (Slides 10, 11, 13, 41, 42, 43).	C
17677	Spreading and Compacting.	I observed that incoming waste was spread in layers that did not exceed two feet in depth prior to compaction by landfill equipment (Slide 36, 41).	C
17678	Slopes and Cuts.	The slope of the working face was 10 degrees as measured with a clinometer. This slope allowed landfill equipment to spread and compact waste so that voids were eliminated.	C
17679	Final Site Face.	The entire southwest side of the fill area was identified by Joe Chambers, Site Supervisor, as a final site face. (See attached site map) (Slide 24, 25, 26, 27, 44, 45). An irrigation system has been installed on this area and hydro-seeding is scheduled for this spring.	C
17680	Stockpiling.	Cover material was stockpiled at 2 locations on the site (See attached site map) (Slides 9, 14, 15, 42, 46). These stockpiles were situated so as not to interfere with other site operations.	C
17681	Availability of Cover.	Cover material excavation activities (Slides 21, 29, 30, 47) and stockpiles of cover material indicated that cover availability was not a current problem at the site. Note: Operators were excavating the last available on-site cover material. If ongoing negotiations to purchase adjacent property for site expansion are not successful, availability of cover material may become a problem.	C

Inspector: Jackie H. Miller

CAC	SECTION	OBSERVATIONS	RESULT
17682	Cover.	Except for several small areas of exposed waste (Slide 37) the working face was covered with 6 inches of dirt when I arrived at the site at 7:30 a.m. (Slides 6, 8). The working face was covered by 5:40 p.m. that evening (Slides 58, 59).	C
17683	Performance Standards.	The site was not operating on performance standards.	N
17684	Intermediate Cover.	The north face, east face, and upper fill surfaces were identified by Joe Chambers, Site Supervisor, as being intermediate cover areas (See attached site map) (Slides 7, 12, 13, 32, 41, 42, 43). Mr. Chambers stated that these areas had at least 12 inches of compacted cover. I did not observe any exposed wastes.	C
17685	Final Cover.	Site Supervisor, Joe Chambers, identified the area at the southwest end of the site and the entire southwest slope of the main fill area as having final cover (See attached site map). Mr. Chambers stated that the cover over these areas was at least two feet thick. I did not observe any exposed wastes.	C
17686	Scavenging.	Scavenging was not observed.	C
17687	Salvaging Permitted.	Salvaging of scrap metal is permitted but was not being conducted at the site.	C
17688	Volume Reduction and Energy Recovery.	I did not observe volume reduction or energy recovery operations being conducted at the facility.	N
17689	Processing Area.	I did not observe volume reduction or energy recovery operations being conducted at the facility.	N
17690	Storage of Salvage.	I did not observe salvage being stored at the site.	N

Inspector: Jack W. Miller

CAC	SECTION	OBSERVATIONS	RESULT
17691	Removal.	I did not observe salvage being stored at the site.	N
17692	Non-Salvageable Items.	I did not observe the salvage of items considered non-salvagable by this Section.	C
		DISPOSAL SITE CONTROLS	
17701	Nuisance Control.	I did not observe a condition that was creating a public nuisance.	C
17702	Animal Feeding.	I did not observe animals planned for human consumption feeding on waste.	C
17703	Fire Control.	I did not observe a fire control problem at the site. Captain Andrate of the L.A. County Consolidated Fire Department Station No. 28 stated in a telephone conversation on 1/22/87 (213-698-7661) that the site is inspected yearly and was in compliance with fire prevention regulations.	C
17704	Leachate Control.	I did not observe any surface leachate. The site had no groundwater monitoring program. It has been operating under Los Angeles Regional Water Quality Control Board (RWQCB) Waste Discharge Requirements No. 63-39 since 1963. Quang Nguyen of the Los Angeles Regional Water Quality Control Board stated in a telephone conversation on 1/5/87 (213 620-5459) that his agency had not taken any recent action regarding the site. However, the site is scheduled for Subchapter 15 compliance review in early 1987. The site has a #2 ranking under the Calderon program and a SWAT proposal is due to the RWQCB by April of 1987.	C

Inspector: Jack W. Miller

CAC	SECTION	OBSERVATIONS	RESULT
17704	Leachate Control (Continued)	Note: On 1/16/87, John Horn of John Mandeville and Associates (818) 369-2224) phoned to inform me that the City of Whittier had hired his firm to help the city prepare the necessary proposals and plans to meet Subchapter 15 and Calderon program regulations for the site.	
17705	Gas Control.	A methane gas monitoring and control problem exists at the site. There are 5 on-site structures: a maintenance shop, the Izaak Walton League Club House, a pistol firing range house, a Sammons Communications cable TV relay station, and site gatehouse (See attached site map). During the inspection on December 29, 1986, a Gas Tech Analyzer indicated methane gas at 7% by volume in a bar hole constructed 18 inches from the southeast corner of the site maintenance shop. Methane gas was also detected at 2 and 3 percent by volume in bar holes constructed near the southwest and southeast sides of the Izaak Walton League Club House. To verify the above readings and determine the extent of any methane gas problems at the site, California Waste Management Board staff returned to the facility on January 28, 1987. On-site structures were tested with an Organic Vapor Analyzer (OVA) and Gas Tech Analyzer (GTA).* Areas of the site which lie adjacent to houses constructed within 1000 feet of the site perimeter were also tested (See attached site map). Results 1) In the maintenance shop, methane gas was detected with the OVA at 500 to 1000 parts per million (ppm) over cracks in the floor. Four bar holes were driven in the maintenance shop floor between 1 and 2.5 feet deep. These holes were	V

Inspector: Jack W. Moller

298

CAC	SECTION	OBSERVATIONS	RESULT
17705	Gas Control (Cont.)	tested for gas with the GTA which gave the following results:	

Bar Hole	Depth Methane in feet	% Volume
#1	1	8
#2	2	1
#3	2	1
#4	2.5	20

2) No methane gas was detected in the Club House.
3) Gas was detected between 75 ppm and 300 ppm in and around the pistol range with the OVA.
4) In the Sammons Communications relay station, gas was detected with the OVA at 150 to 160 ppm at eye level and at 7.2% by volume under the equipment cabinet as tested with the GTA (both measurements were recorded with the door open and a slight breeze blowing by). In a bar hole constructed ten feet from the relay station, methane gas was measure at 55% by volume.
5) The site gatehouse was not tested for gas.
6) Three bar holes constructed near the site perimeter within 75 feet of adjacent homes showed 41% to 52% methane gas by volume when tested with the GTA.

In light of the above findings and the fact that the facility does not currently have a methane gas monitoring or control program, the site is considered to be in violation of CAC Section 17705.**

Notes:

* The detection range of an OVA is 1 ppm to 10,000 ppm; 10,000 ppm is equivalent to 1% gas by volume; detection

Inspector: Jack W. Miller

CAC	SECTION	OBSERVATIONS	RESULT
17705	Gas Control (Cont.)	range of a GTA is .1% to 100% methane gas by volume; the explosive range of methane gas in a confined space is between 5% and 15% gas by volume, above 15%, methane is flammable but not explosive; methane can be a carrier of other gasses and chemicals including benzene and vinyl chloride. ** Site owners are in the process of applying to the South Coast Air Management District for a permit to construct and operate a gas control system (application #150396).	V
17706	Dust Control.	Dust was controlled with a 2,500 gallon water truck.	C
17707	Vector and Bird Control.	No vectors were observed during the inspection. Birds observed at the working area were unlikely to cause a public nuisance or hazard to aviation due to their low numbers and location of the site.	C
17708	Drainage and Erosion Control.	Erosion had exposed waste on the east face of the main fill area near both the northeast and southeast corners (See attached site map) (Slides 22, 23, 28, 52, 53, 54, 56, 57). Another area of severe erosion was observed at the middle of this same face but had not exposed waste (Slides 33, 34, 35). Two other erosion problems were observed on the southwest sector of the site on virgin ground (See attached site map) (Slides 17, 18, 49, 50).	V
17709	Contact with Water.	No waste was observed in contact with water.	C
17710	Grading of Fill Surfaces.	The lateral runoff of precipitation was promoted by a 2 degree slope to the S.W. on the top of the main fill area. I did not observe any indications that ponding occurred during periods of wet weather.	C

Inspector: Jack W. Miller

CAC	SECTION	OBSERVATIONS	RESULT
17711	Litter Control.	Joe Chambers, Site Supervisor, stated that litter was picked up on an as-needed basis. Except for a small patch of litter observed along the north perimeter of the site (Slide 40), litter control was not observed to be a problem.	C
17712	Noise Control.	Houses are situated along the southwest perimeter of the site. However, landfill operations were being conducted at the northeast sector of the site. I did not observe a noise control problem.	C
17713	Odor Control.	I did not observe any noxious or unpleasant odors drifting off site.	C
17714	Traffic Control.	Site traffic patterns were not observed to jeopardize public safety. Vehicles were not seen stacking onto public streets.	C
17715	Ponded Liquid.	No liquids were observed to be ponded at the site.	C
		DISPOSAL SITE EQUIPMENT.	
17726	General.	The site had two large bulldozers, one small dozer, two scrapers, and one water truck. Routine equipment maintenance and repairs were performed by operators. I did not observe conditions that indicated a failure to employ and maintain equipment of sufficient numbers, type, or capacity to meet the criteria in this standard.	C
17727	Standby Equipment.	One bulldozer and one scraper were maintained on standby. Additional standby equipment was available from a local rental company.	C

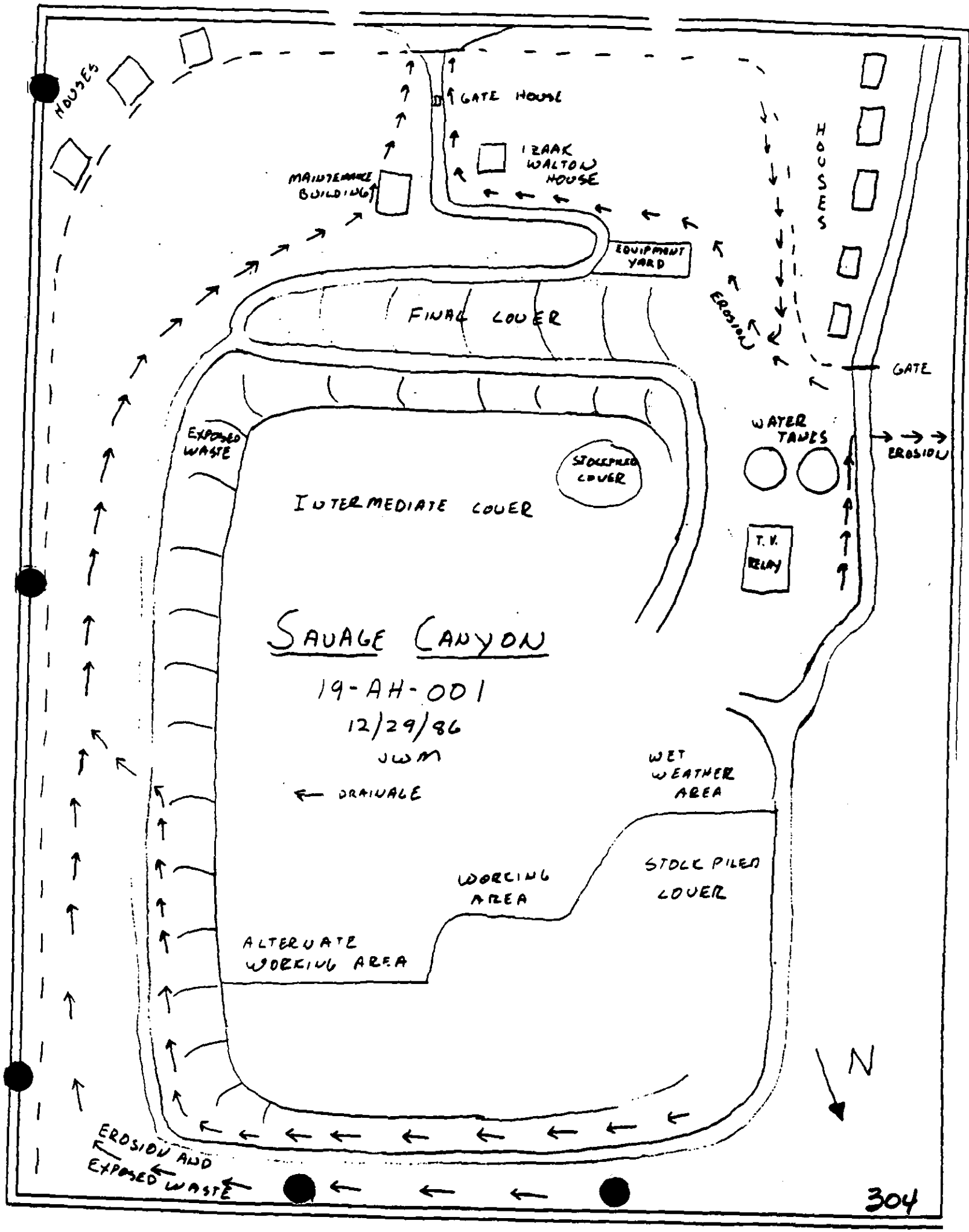
Inspector: Jack W. Miller

CAC	SECTION	OBSERVATIONS	RESULT
		DISPOSAL SITE MAINTENANCE.	
17731	General.	There were not three or more maintenance related violations.	C
17732	Operating Site Maintenance.	I did not observe any deteriorated or defective conditions that would indicate site facilities were not maintained on a regular basis.	C
17733	Inspection on Completion.	This Section only applies to closed sites.	N
17734	Completed Site Maintenance.	This Section only applies to closed sites.	N
17735	Recording.	The operation of this site predates the implementation of this standard.	N
		DISPOSAL SITE SPECIAL WASTES.	
17741	Burning Wastes.	Space is maintained at the unloading area to separate, spread, and extinguish any incoming wastes that are burning or smoldering. No such wastes were observed during the inspection.	C
17742	Hazardous Wastes.	The site is not permitted to accept hazardous wastes. Signs telling users that hazardous wastes were not accepted were posted at the gatehouse (Slides 2, 5). I did not observe any hazardous wastes being deposited at the site.	C
17743	Liquid Wastes.	Liquid wastes are not permitted at the site. None were observed.	C
17744	Dead Animals.	The site is not permitted to accept large dead animals. None were observed during the inspection.	C

Inspector: Jack H. Miller

CAC	SECTION	OBSERVATIONS	RESULT
		DISPOSAL SITE REPORTS AND REVIEWS.	
17751	Periodic Site Review.	The last recorded site review by a registered engineer was in November, 1975. A five-year engineering review certified by a registered civil engineer was due by November, 1980.	V
NOTES		Joe Chambers, Site Supervisor, was present for part of the inspection. I briefly spoke with Tony Portolese, City of Whittier Sanitation Superintendant, during the inspection.	

Inspector: Jack W Miller


HOUSES
GATE HOUSE
IZAAK WALTON HOUSE
MAINTENANCE BUILDING
EQUIPMENT YARD
HOUSES
FINAL COVER
EROSION
GATE
WATER TANKS
EROSION
EXPOSED WASTE
STOCKPILED COVER
INTERMEDIATE COVER
T.V. RELAY
SAVAGE CANYON
19-AH-001
12/29/86
JWM
DRAINAGE
WET WEATHER AREA
STOCK PILED COVER
WORKING AREA
ALTERNATE WORKING AREA
N
EROSION AND EXPOSED WASTE

SWIS-49 (REV. 1/85)

NOTICE OF INSPECTION
DISPOSAL SITE

LOCAL ENFORCEMENT AGENCY: _____

FACILITY FILE NUMBER / COUNTY	INSPECTION DATE	T-OUT	TOTAL TIME (DECIMAL HOURS)
19 [redacted]	[redacted] 9/86	T-IN	(1031) 3

FACILITY NAME: SAVAGE CANYON D.S.

FACILITY LOCATION: 13919 E PENN ST WHITTIER CA

INSPECTOR: J. MILLER

ALSO PRESENT: JOE CHAMBERS, TONY PORTOLESE

RECEIVED BY:
Operator _____
Owner _____

Comments: (SEE ATTACHED PRESLEY INSPECTION RPT)

	*V	C
(3011) RECORDS		☒
☐ ACCURATE WEIGHT/VOLUME RECORDS MAINTAINED 17636		
☒ ADEQUATE SUBSURFACE RECORDS MAINTAINED 17637		
☐ LOG OF SPECIAL OCCURRENCES MAINTAINED 17638		
☐ RECORDS AVAILABLE FOR INSPECTION 17639		
(3021) PERSONNEL		☒
☐ ADEQUATE NUMBER OF QUALIFIED PERSONNEL AVAILABLE 17646		
☐ PERSONNEL ADEQUATELY TRAINED 17647		
☐ ADEQUATE SUPERVISION PROVIDED 17648		
☐ SITE ATTENDANT AVAILABLE FULL-TIME OR AS DETERMINED BY LEA 17649		
(3031) SIGNS		☒
☐ IDENTIFICATION SIGNS AT EACH POINT OF ACCESS 17656		
☐ ENTRY SIGN STATES FEES, HOURS OF OPERATION, WASTES ACCEPTED/NOT ACCEPTED 17657		
☐ NON-HAZARDOUS UNATTENDED SITES HAVE SIGN WARNING USERS OF UNAVAILABILITY OF COMMUNICATION FACILITIES 17658		
(3041) SECURITY		☒
☐ ADEQUATE PERIMETER SECURITY, HAZARDOUS AREAS FENCED AND IDENTIFIED 17659		
(3051) ROADS		☒
☐ ACCESS ROADS HAVE SMOOTH SURFACE, MINIMIZE DUST AND TRACKING OF MUD, AND ALLOW ALL-WEATHER ACCESS 17665		
☐ INTERNAL ROADS IN SAFE CONDITION, PROVIDE ACCESS DURING INCLEMENT WEATHER, AND ARE PROVIDED WITH DIRECTIONS 17669		
(3071) SANITATION		☒
☐ ADEQUATE SANITARY FACILITIES AVAILABLE 17666		
☐ SAFE ADEQUATE DRINKING WATER AVAILABLE 17667		
(3081) COMMUNICATIONS		☒
☐ COMMUNICATION FACILITIES AVAILABLE WHERE HAZARDOUS WASTES ARE ACCEPTED 17668		
(3091) LIGHTING		☒
☐ LIGHTING ADEQUATE 17669		
(3101) SAFETY		☒
☐ SAFETY EQUIPMENT IN USE AND BEING WORN 17670		

	V	C
(3111) CONFINED UNLOADING		☒
☐ UNLOADING ADEQUATELY CONFINED 17676		
(3141) SPREADING/COMPACTING		☒
☐ SPREADING AND COMPACTION IN TWO-FOOT LAYERS 17677		
(3151) SLOPES/CUTS/GRADING		☒
☐ WORKING FACE SLOPES ALLOW EFFECTIVE COMPACTION, DEPTH OF CUTS AND SLOPES OF TRENCH SIDES AS APPROVED BY LEA 17678		
☐ FINAL SLOPES HAVE NEAT APPEARANCE AND ARE 1-3/4 : 1 OR FLATTER 17679		
☐ GRADING OF FILL SURFACES ADEQUATE 17710		
(3161) COVER		☒
☐ STOCKPILING OF COVER DOES NOT INTERFERE WITH OPERATIONS 17680		
☐ SUITABLE QUALITY AND SUPPLY OF COVER MATERIAL AVAILABLE 17681		
☐ COVER PROVIDED AT REQUIRED DEPTH AND FREQUENCY 17682		
☐ INTERMEDIATE COVER PROVIDED AT REQUIRED DEPTH AND FREQUENCY 17684		
☐ FINAL COVER PROVIDED AS REQUIRED 17688		
(3171) SALVAGING/PROCESSING		☒
☐ SCAVENGING PROHIBITED 17686		
☐ SALVAGING DOES NOT INTERFERE WITH OPERATIONS 17687		
☐ VOLUME REDUCTION AND ENERGY RECOVERY DO NOT INTERFERE WITH OPERATIONS OR CREATE HEALTH, SAFETY OR ENVIRONMENTAL PROBLEMS 17688		
☐ SALVAGING AND VOLUME REDUCTION CONFINED TO CLEARLY IDENTIFIED AREAS 17689		
☐ SALVAGE STORAGE LOCATION OK, VOLUME AS APPROVED BY LEA, MINIMIZES FIRE, NUISANCE 17690		
☐ SALVAGE STORAGE TIME DOES NOT RESULT IN HEALTH OR FIRE PROBLEMS 17691		
☐ SALVAGED MATERIALS APPROVED BY LEA AND LOCAL HEALTH 17692		
(3181) NUISANCE		☒
☐ OPERATIONS DO NOT CREATE A PUBLIC NUISANCE 17701		
☐ FEEDING OF REFUSE TO ANIMALS FOR HUMAN CONSUMPTION PROHIBITED 17702		

	V	C
(3191) FIRE		☒
☐ FIRE CONTROL ADEQUATE 17703		
(3192) FIRE (P)		☒
☐ BURNING MATERIALS SPREAD AND EXTINGUISHED. LEA, SWMB NOTIFIED IMMEDIATELY OF FIRE NOT EXTINGUISHED IN 24 HOURS 17683		
(3201) LEACHATE		☒
☐ ADEQUATE STEPS TAKEN TO MONITOR, COLLECT, TREAT, AND DISPOSE OF LEACHATES 17704		
☐ NO WASTES IN DIRECT CONTACT WITH WATER EXCEPT AS APPROVED BY RWQCB 17705		
(3202) LEACHATE (P)		☒
☐ REFUSE COVERED WITH NEXT DAY'S REFUSE OR WITH SIX INCHES OF COMPACTED SOIL. TOTAL AREA OF EXPOSED REFUSE IS AS SPECIFIED FOR WET AND DRY SEASONS 17683		
(3211) GAS		☒
☐ GAS MONITORING AND CONTROL AS REQUIRED 17706		
(3221) DUST		☒
☐ DUST CONTROL ADEQUATE 17708		
(3231) VECTORS/BIRDS		☒
☐ VECTOR AND BIRD CONTROL ADEQUATE 17707		
☐ LIQUID PONDS MINIMIZE VECTOR PROPAGATION 17718		
(3232) VECTORS (P)		☒
☐ THRESHOLD VALUES FOR VECTOR POPULATIONS NOT EXCEEDED 17683		
(3241) DRAINAGE/EROSION		☒
☐ DRAINAGE AND EROSION CONTROL ADEQUATE 17709		
(3251) LITTER		☒
☐ LITTER CONTROL ADEQUATE 17711		
(3252) LITTER (P)		☒
☐ LITTER NOT ALLOWED TO MIGRATE OFF-SITE 17683		
(3261) NOISE		☒
☐ NOISE CONTROL ADEQUATE 17712		
(3271) ODOR		☒
☐ ODOR CONTROL ADEQUATE 17713		
(3272) ODOR (P)		☒
☐ AMBIENT AIR AT OR BEYOND FACILITY BOUNDARY IS NOT OBNOXIOUS 17683		

	V	C
(3281) TRAFFIC		☒
☐ TRAFFIC CONTROL ADEQUATE WITHIN SITE. TRAFFIC MINIMIZES INTERFERENCE, SAFETY PROBLEMS, AND STACKING ON PUBLIC ROADS 17714		
(3291) EQUIPMENT		☒
☐ EQUIPMENT ADEQUATE IN TYPE, CAPACITY, AND NUMBER, AND IS ADEQUATELY MAINTAINED 17726		
☐ STANDBY EQUIPMENT AVAILABLE TO COMPLY WITH SEC. 17683 AND OTHER SECTIONS 17727		
(3301) MAINTENANCE		☒
☐ EFFECTIVE MAINTENANCE PROCEDURES AND PROGRAMS DEVELOPED AND UTILIZED 17731		
☐ ADEQUATE MONITORING AND REPAIR OF DETERIORATED CONDITIONS 17732		
(3311) CLOSURE		
☐ AFTER CLOSURE, IF LEACHATE, EXTENSIVE SURFACE CRACKING OR SETTLEMENT OCCURS, THE OWNER SHALL NOTIFY LEA AND SHALL MONITOR AND REPAIR SITE FOR A PERIOD OF 5 YEARS OR LONGER 17734		
☐ UPON SITE CLOSURE, DETAILED DESCRIPTION MUST BE FILED WITH THE LEA AND WITH THE COUNTY RECORDER 17735		
(3321) SPECIAL WASTES		☒
☐ BURNING WASTES IMMEDIATELY SPREAD AND EXTINGUISHED IN SAFE AREA 17741		
☐ SITE ACCEPTS ONLY APPROVED HAZARDOUS WASTES AND TAKES PRECAUTIONS TO ELIMINATE OR CONTROL HARMFUL DUSTS, FUMES, MISTS, VAPORS, OR GASES 17742		
☐ LIQUID WASTES APPROVED BY RWQCB, LOCAL HEALTH ENTITY AND LEA 17743		
☐ DEAD ANIMALS ALLOWED BY LOCAL REGULATIONS 17744		
(3331) OTHER		☒
☐ 17751 PERICOIL SITE REVIEW		

N/A

*V = Violation
C = Compliance

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DISTRIBUTION: WHITE — CWMB YELLOW — OPERATOR PINK — LEA

CALIFORNIA WASTE MANAGEMENT BOARD
Agenda Item #11-D
March 26-27, 1987

Item:

Consideration of notifying the operator of the Sacramento City Landfill (Sacramento County) of the Board's intent to include that facility on the State List of Non-Complying Facilities as required by Government Code Section 66796.38.

Key Issues

- An evaluation of all available data regarding the compliance of Sacramento City Landfill with State Minimum Standards has recently been completed.

- Several ongoing and/or repeated violations of State Minimum Standards were documented during the inspections, including:

  Site Security (Ongoing)
  Scavenging (Repeated)
  Drainage and Erosion Control (Repeated)
  Grading of Fill Surfaces (Repeated)
  Operating Site Maintenance (Ongoing)

- Staff recommends that the site operator be directed to establish a compliance schedule within 30 days. The Executive Officer would be authorized to issue a 90-day notice of the Board's intent to place the site on the State List of Non-Complying Facilities if the adopted compliance schedule is not met.

Site Information:

Name:	Sacramento City Landfill
SWIS #:	34-AD-0004
Facility Type:	Class III Sanitary Landfill
Operational Status:	Open
Location:	28th and A Street, Sacramento
Setting:	Residences to the east and south, vacant land and and industrial development to the west and the American River to the north
Permitted Tonnage:	600 TPD
In Place Tonnage:	Approximately 2,000,000 tons
Permitted Acreage:	113 acres
Facility Owner:	City of Sacramento
Facility Operator:	City of Sacramento - Solid Waste Division
Local Enforcement Agency:	Sacramento Co. Environmental Health Department

Summary of Repeated Presley Violations

CAC Section	1st Inspec. 11/15/85	2nd Inspec. 6/23/86	3rd Inspec. 1/26/87
17658 - Site Security	Violation	Violation	Violation
17686 - Scavenging	Violation	Violation	Comply
17708 - Drainage/Erosion Control	Comply	Violation	Violation
17710 - Grading of Fill Surfaces	Violation	Comply	Violation
17732 - Operating Site Maintenance	Violation	Violation	Violation

Background:

Sacramento City Landfill is an existing 113 acre, Class III landfill which is permitted to accept 600 tons of waste per day. Disposal operations began in 1949 and sanitary landfill operations began in the 1960's. A Solid Waste Facility Permit was issued on January 27, 1978. According to the most recent permit, September 21, 1984, the disposal site is to terminate operations in approximately January of 1988.

Types of wastes received at this site include:

a) Household Garbage
b) Garden Refuse
c) Vegetal Rubbish
d) Restaurant Waste
e) Office Wastes
f) Construction/demolition Wastes

The following actions are prohibited at this facility:

1. Disposal of Group 1 or hazardous wastes.
2. Disposal of liquid wastes.
3. Scavenging
4. Open Burning

The facility is owned and operated by the City of Sacramento and is limited to accepting wastes collected by City collection trucks. Operations are conducted by the City's Department of Public Works, Solid Waste Division.

Land surrounding the site includes residences to the south and east, vacant land and industrial development to the west and the American River and American River Parkway to the North.

Related Issues:

The site has a #1 Ranking under the Calderon Program. The operator has been working with the Central Valley Regional Water Quality Control Board (RWQCB) to gain compliance with Calderon legislation. As changes are made with respect to the Calderon program, Subchapter 15 requirements are being revised and updated. Monitoring wells have been installed and split samples were recently taken. Sampling showed high concentrations of Bromomethane; Vinyl Chloride; 1,1,1 Trichloroethane; and Trichlorofluoromethane. The action level set by Department of Health Services, Sanitary Engineering Branch, was 2 PPB for Vinyl Chloride. Concentrations of up to 43 PPB Vinyl Chloride were recorded. None of the other parameters exceeded the action levels. A Proposition 65 notice was sent to the Sacramento County Board of Supervisors and the Local Health Officer due to the legal requirements of reporting hazardous waste discharges.

Related Issues (Cont.)

The site previously handled infectious waste but this was terminated January 1, 1986. The on site vegetal waste processing facility is no longer operating. The City and State are currently negotiating a contract for the State to take over the facility. The City, according to Chris Choate, Chief of Solid Waste Disposal, has no intention of using the facility. There is an active composting area on site.

A landfill expansion site, consisting of 35 acres, extending from the south-east of the existing landfill, has been permitted and is currently accepting waste. The expansion area includes a groundwater dewatering system, a compacted clay liner and a leachate collection system. This area will be used for fill during the winter months.

A landfill Closure Plan was submitted in accordance with Waste Discharge Requirement Order No. 84-094 to the Regional Water Quality Control Board-Central Valley Region (RWQCB-CVR) . The plan addressed closure of the existing and expansion areas of the landfill. It was accepted by the RWQCB-CVR as documented by a letter dated January 22, 1986. The final draft was dated June 4, 1986. A grading plan, detailed with maps, was included in the report.

Past Compliance:

For the period between November 1, 1984 and November 1, 1985, a year before the Presley evaluation started, 40 inspections by the Local Enforcement Agency (LEA) were conducted. The following table summarizes the violations noted by the LEA for this time period.

CAC Section	Number of Violations
17710 - Grading	11
17682 - Cover	3
17711 - Litter	4
17731 - General	6
17732 - Operating Site Maintenance	6
17709 - Waste in Contact	1
17685 - Final Cover	1
17704 - Leachate Control	1
17708 - Drainage/Erosion Control	1
	34

Past Compliance (Cont.)

During this period:

- A compliance plan was implemented by the City Division of Public Works on September 18, 1984 in reply to the CWMB's request for more information in order to review an Updated Report of Disposal Site Information on August 20, 1984. The compliance plan included administration changes, and changes in disposal site operations including odor mitigation, slopes and cuts, cover, training, infectious waste handling, litter, disposal site enforcement, and equipment plans.
- There was concern that the landfill was far exceeding its permitted daily tonnage requirements. This was clarified after findings that the original permit issued did not include tonnages from vegetal waste, composted waste and construction and demolition waste in the permitted daily tonnage. In a letter from Kenneth Stuart, County Environmental Health Branch, on October 25, 1985, to Herb Iwahiro of the CWMB, it was stated that the landfill was not exceeding its allowable daily tonnage rate and that a permit revision or a notice to cease and desist was not necessary.
- The Sacramento County Health Department became the sole LEA for the landfill on January 22, 1985. Prior to this, the Sacramento City Planning Department acted as a joint LEA with the County Health Department but was dedesignated for not fulfilling its duties as an enforcement agency.
- In a letter dated April 16, 1985 from Solon Wisham, Assistant City Manager, to George Eowan of the CWMB, it was stated that the debris found in and around the City Landfill that sparked newspaper articles and public opposition, was the result of the prior floods and 'internal operation deficiencies' and was subsequently corrected by the City.
- In a letter on January 28, 1985, after an inspection of the site, Joe Spano, RWQCB-CVR ordered more frequent samplings of monitoring wells due to the significant increase of parameters measured in the monitoring wells. New groundwater monitoring wells were put in place after Regional Water Quality Control Board findings, stated in a letter dated April 22, 1985, that the old ones were not effective. Subsequent monitorings, issued in a report dated January 3, 1986, showed levels of Vinyl Chloride that exceeded the action level of 2PPB set for Vinyl Chloride by The Department of Health Services. Samples were taken from the adjacent American River which showed that no contamination was found in the river. The levels of Vinyl Chloride as well as other compounds have steadily been rising as documented by subsequent water quality monitoring reports.

Recent Compliance

During the California Waste Management Board Evaluation period for Sacramento City Landfill (November 14, 1985 to January 26, 1987) there were 38 Local Enforcement Agency inspections, available for staff review. The most recent being on 01/14/87. Two LEA violations were noted during this period, one for Site Security and one for Vectors and Birds. The decrease in LEA violations during this period, as opposed to the period between November 1, 1984 and and November 1, 1985, has been attributed to better site operations according to Art Seipel, during a phone conversation on 3/4/87.

A chronology of events occurring during the CWMB evaluation is presented below:

November 14-15, 1985

The first of three inspections by the CWMB was conducted by Richard Hill. Sections in violation were as follows:

17656 - Identification Signs
17658 - Site Security
17679 - Final Site Face
17682 - Cover
17686 - Scavenging
17710 - Grading of Fill Surfaces
17714 - Traffic Control
17732 - Operating Site Maintenance
17742 - Hazardous Wastes

Sections with an Indeterminate status were as follows:

17647 - Training
17684 - Intermediate Cover
17704 - Leachate Control
17705 - Gas Control
17731 - Disposal Site Maintenance-General
17735 - Recording

All other CAC sections were found to be either in compliance or not applicable.

May 8, 1986

Results of the first inspection were transmitted to the operator and the LEA (Attachment I). The cover letter described the nature of our evaluation program and the consequences of noncompliance.

Recent Compliance (Cont.)

May 22, 1986

A letter from John Boss (Attachment 2), acknowledging the receipt of Richard Hill's inspection, was received. Mr. Boss stated that the site's operation has steadily improved and in general complies with the criteria for sanitary landfilling. He said that the City is in the process of reviewing the notices of violation, many which have already been corrected. Funding had also been requested to correct the others.

May 28, 1986

A letter from John Bell of CWMB was submitted thanking John Boss for his comments (Attachment 3).

June 4, 1986

The City of Sacramento completed its final report on their Closure Plan.

Note: It was not reviewed by the CWMB and no written comments were made.

June 23, 1986

The second of the three inspections was conducted by Pamela Badger.

Sections in violation were as follows:

17656 - Identification Signs
17658 - Site Security
17686 - Scavenging
17708 - Drainage and Erosion Control
17732 - Operating Site Maintenance

Section 17704 - Leachate Control was given an indeterminate status.

All other CAC sections were found to be either in compliance or not applicable.

July 25, 1986

A letter from John Boss to George Eowan was received alleging the elimination of the sites non-compliance through Board staff and LEA inspections (Attachment 4).

August 7, 1986

The results of the second CWMB inspection were transmitted to the operator and the LEA (Attachment 5). The cover letter again explained the nature of the evaluation program and the consequences of non-compliance.

Recent Compliance (Cont.)

August 19, 1986

A letter from George Eowan was sent to John Boss acknowledging his receipt and referral, of the July 25, 1986 letter, to staff (Attachment 6).

October 1, 1986

A letter from John Boss (Attachment 7), in reply to Pamela Badger's inspection, was received. A summary of corrective actions for the violations noted were addressed:

- An identification sign was to be in place by October 1986.
- A fence was to be installed by November 28, 1986.
- Construction of the fence will eliminate unauthorized access.
- Improvements of grading began in September 1986. This would alleviate the drainage problems.
- Erosion was to be repaired by September 26, 1986.

October 28, 1986

The CWMB acknowledged receipt of the letter received on October 1, 1986 (Attachment 8).

January 26, 1987

The third Presley inspection was conducted by Neil Sherman. Sections in violation were as follows:

17658 - Site Security
17732 - Operating Site Maintenance
17710 - Grading of Fill Surfaces
17708 - Drainage and Erosion Control

All other CAC sections were found to be either in compliance or not applicable.

February 24, 1987

Results of the third inspection were transmitted to the operator and LEA (Attachment 9). The cover letter reiterated the nature of our evaluation program. It also advised the operator of the March Agenda Item and invited them to attend.

Recent Compliance (Cont.)

February 27, 1987

In a phone conversation, Neil Sherman, Board staff, informed Tim Crandell, Regional Water Quality Control Board, that the Sacramento City Landfill was not adhering to its closure plan since they did not meet the specified deadline of December 1986 to complete Phase I of their final grading plan. Tim Crandell stated that the site is required to notify the Regional Water Quality Control Board if the site is not operating in accordance with the closure plan. He had received no such notification and will be contacting the site operator for an explanation. He also stated that he would be doing some water quality sampling in the American River during its low stages to determine if any contamination is taking place in the river. If contaminants are found, the RWQCB will be taking action. Since contamination was found in the inactive portion of the landfill, he will be asking for more sampling to be done. If those samples show contamination, the RWQCB will take remedial actions including sealing the top of the site to prevent further water infiltration. He said that he will also require more frequent monitorings.

March 3, 1987

A telephone conversation was conducted in which Tim Crandell, Regional Water Quality Control Board, informed Neil Sherman, Board staff, that the Sacramento City Landfill staff had received their data from the split samples taken for groundwater monitoring. Sacramento City results differed significantly from the results obtained by the Regional Water Quality Control Board. Mr. Crandell stated that another round of sampling was needed and tnat three-way split samples, the third going to an independent lab will be taken and that all action against the site has been put on hold.

Summary:

The Sacramento City Landfill has been evaluated by the California Waste Management Board staff for compliance with State Minimum Standards. All pertinent information including data from three separate California Waste Management Board staff inspections have been reviewed. Continued violations for the following sections have been documented:

17658 - Site Security

Site Security violations were noted on all three Presley inspections. In John Boss' response to Ms. Badger's inspection, dated October 1, 1986, it was noted that a fence was to be installed, so as to control unauthorized access from the American River levees, by November 28, 1986. The fence was not complete by the day of the third inspection, January 26, 1986. Parts of fencing were missing and in need of repair around the perimeter of the landfill. Violations for scavenging (see 17686 - Scavenging, below) had been noted in two of the three inspections and a person was removed for attempting to scavenge on the morning of the third inspection. These scavengers live on the bank of the river adjacent to the landfill and can provide continued health and safety risks as well as a nuisance to the operators of the landfill if fencing is not completed, monitored, and repaired on a continual basis.

17686 - Scavenging

Scavenging has been a continuing problem at the site due to a 24-hour unlimited access to the site (see 17658 - Site Security, above).

17708 - Drainage and Erosion Control

Erosion has been noted as violations in the second and third inspections. The areas of these erosion problems were on the levee separating the old and expansion areas of the landfill. Title 14, Chapter 3, Section 17708 of the State Minimum Standards reads, "If erosion occurs, it shall be promptly repaired with steps taken to prevent further occurence". Eroded areas noted on the third inspection had not been promptly repaired as evidenced by vegetation growing in these areas. Chris Choate, Site Supervisor, had mentioned during the third inspection, that the site is not actively controlling the erosion since it had not deteriorated and that a drainage system had been installed to prevent erosion. Drainage systems, observed during the third inspection, would not drain effectively due to improper grading and blocked drains. Drainage systems do not prevent erosion if they do not drain effectively.

Summary (Cont.)

17710 - Grading of Fill Surfaces

Improper grading was observed on the first and third inspections and evidence of improper grading was noted in the second inspection. A phased approach was outlined in the Final Closure Plan to grade the 'old portion' of the landfill. The plan called for Phase 1 to be completed by the end of 1986. The area depicted by Phase 1 was not graded as observed by Mr. Sherman, the inspector doing the third inspection. Ponded water was observed on the area that was to be at final grade.

17731 - Operating Site Maintenance

Section 17731 of Title 14, Chapter 3 of the State Minimum Standards reads "The operator shall monitor and promptly repair or correct deteriorated or defective conditions with respect to the requirements of these standards..." Violations for this section were noted on all three inspections. An interpretation of this section reveals that the site is not constantly maintaining, repairing, and correcting deteriorated or defective conditions.

Board Options:

Option #1

Direct the operator to establish a schedule for bringing the site into compliance with State Minimum Standards.

Under this option, the operator must submit a compliance schedule to the Board within 30 days stating specific dates for initiating and completing the required actions outlined below. If an agreeable schedule is not received by the Board within 30 days and/or if dates specified for implementing and completing the required actions are not met, this option authorizes the Chief Executive Officer to issue a 90-day notice of the Board's intent to place the site on the State List of Non-Complying Facilities.

Specified Actions:

17758 - Site Security

Complete and repair fencing around the site's perimeter to discourage unauthorized access to the site.

Specified Actions (Cont.)

17686 - Scavenging

Watch for and immediately remove all persons found scavenging through the waste. The Local Enforcement Agency will be asked to verify this at least twice a week during the Compliance Period.

17708 - Drainage and Erosion Control

Monitor and promptly repair erosion and drainage channels so that waste is not exposed and a safety hazard is not created. Grade drainage channels so that all surface water drains effectively and unclog all drains so that effective drainage is maintained.

17710 - Grading of Fill Surfaces

An immediate grading plan should be submitted outlining the present and future dates for areas to be placed at final grade.

17732 - Operating Site Maintenance

Develop and implement a maintenance program to ensure that all deteriorated or defective site conditions are promptly repaired or corrected.

Option #2

Notify the operator of the Board's intent to place Sacramento City Landfill on the State List of Non-Complying Facilities unless the following actions are taken within 90 days of notice.

The operator must develop a compliance schedule that is mutually agreed upon by the Local Enforcement Agency and Board staff that will accomplish the required actions outlined in Option #1. Failure to meet any deadline contained in the compliance schedule will result in a recommendation by staff to place the site on the State List of Non-Complying Facilities. In no case will such a recommendation be made in less than 90 days. Verification of all deadlines will be made through additional staff inspections as necessary.

Option #3

No Action

Notification:

The site operator and LEA have been invited to present to the Board at its March meeting any information relevant to the matter under consideration.

Recommendation:

Based on the information available to staff at this time, staff recommends that the Board implement Option 1.

Sacramento City Landfill

Attachment

#1 1st CWMB Inspection Report, May 8, 1986.

#2 Operator response to 1st CWMB Inspection, May 22, 1986.

#3 CWMB note to operator acknowledging response to 1st inspection, June 4, 1986.

#4 Letter from operator to CWMB alleging elimination of site's non-compliance, July 25, 1986.

#5 2nd CWMB Inspection Report, August 7, 1986.

#6 Letter from CWMB to operator in response to July 25, 1986 letter, August 19, 1986.

#7 Operator's response to 2nd CWMB inspection, October 1, 1986.

#8 CWMB response to operator's letter concerning 2nd inspection, October 28, 1986.

#9 3rd CWMB Inspection Report, February 24, 1987.

STATE OF CALIFORNIA GEORGE DEUKMEJIAN, Governor

CALIFORNIA WASTE MANAGEMENT BOARD
1020 NINTH STREET, SUITE 300
SACRAMENTO, CA 95814

To: M.H. Johnson, Director
Department of Public Works
915 I Street, Room 207
Sacramento, CA 95814

Subject: Report of inspection: Sacramento City Landfill
34-AD-004

Government Code Section 66796.38 requires the California Waste Management Board (Board) to conduct inspections of solid waste facilities for the purpose of evaluating compliance with the State Standards for Solid Waste Handling and Disposal (Title 14. California Administrative Code, Division 7 Chapter 3, commencing with section 17200). Under this program, each facility will be inspected at least three separate times. As you are aware by now, staff has already conducted one of these inspections at the subject facility. The date of that inspection was November 14-15, 1985. A report resulting from the recent inspection is enclosed. If photographs are referred to in the inspection report, copies will be obtainable upon written request.

The goal of our inspection program is to verify compliance with each of the State Minimum Standards, not merely to find violation(s) of these standards. In order to achieve this we will, as I stated above, be inspecting each facility at least three times. This will provide the following advantages over the previous inspection techniques:

* The program will provide greater fairness to operators of facilities by reducing the possibility that one operator will be inspected under adverse conditions and another under favorable conditions.

* The program will allow for evaluation of conditions, which show seasonal variations such as effectiveness of leachate control systems, vectors, dust, etc.

* The program will provide a track record of compliance which will be used in evaluating standards for which a single violation may not be sufficient reason to place the facility on the State List of Non-Complying Facilities when the facility is generally in compliance with that standard, i.e., the daily cover standard.

Although we do not intend to provide advance notice of the inspection dates to operators, the Local Enforcement Agency (LEA) will be notified of those dates, and will be invited to accompany our staff on the inspection.

If, after three inspections, your facility continues to be operating in violation of one or more of the State Minimum Standards you will be notified of this finding by certified letter. A copy of that letter will be sent to the LEA. After 90 days or upon notification of correction of all violations(s), Board staff will reinspect the facility. If the facility is still in violation, staff will notify you and the LEA, by certified letter of staff's intent to recommend that the Board place the facility's name on the State List of Non-Complying Facilities at a regularly scheduled meeting of the Board. Should the Board place the facility on that list, State law (Government Code 66796.39) requires that the LEA develop a compliance schedule for correction of the violation(s). If compliance is not achieved within one year, Government Code section 66796.39 directs LEAs to revoke facility operating permits. If the facility is closed or abandoned, staff will recommend that the LEA issue a notice of violation and an order to correct the violations. That Notice and Order will also notify you or the owner of the facility that State law provides that "the unremedied condition of the facility is prima facie evidence of negligence, and in any action for damages against the owner of the property for injury caused by the unremedied condition, the burden of proving the injury was not caused by an unremedied condition shall be on the owner of the property".

If you have any questions regarding the program, please contact me at (916) 322-6172.

Sincerely,

John K. Bell, Manager
Monitoring Section

cc: Kenneth Stuart, Environmental Health

mea

CALIFORNIA WASTE MANAGEMENT BOARD

DISPOSAL SITE
EVALUATION REPORT

Facility Name: Sacramento City Landfill Facility ID No.:34-AD-004

Name of Inspector: Richard Hill Inspection Dates:11/14-15, 85

Signature: Richard E. Hill

CAC Section:	Observations:	Conclusions:
Disposal Site Information:		
17616 Report of Disposal Site Information	The RDSI appears to address the concerns outlined in section 17616.	Comply
Design Responsibility:		
17626 Design Responsibility	Mr. Bruce Barboza is listed as the staff engineer responsible for this facility, and is a California Registered Civil Engineer.	Comply
17627 Ultimate Use	A city council resolution dated August 1, 1984 designated the future use as a recreational/park site.	Comply
17628 General Design Parameters	The RDSI and Permit appear to meet the conditions listed in section 17628.	Comply
17629 Public Health Design Parameters	The RDSI and Permit appear to meet the conditions listed in section 17628.	Comply

Section Chief JKB

Facility Name: Sacramento City Landfill Facility ID No.:34-AD-004

Name of Inspector: Richard Hill Inspection Dates:11/14-15, 85

Signature: Richard E. Hill

CAC Section:	Observations:	Conclusions:
Disposal Site Records:		
17636 Weight/Volume Records	It appeared that all vehicles were weighed at the scalehouse.	Comply
17637 Subsurface Records	The Draft Closure Plan contains maps showing geological formations, topographical features and final elevations as planned. Locations of, and results from the groundwater monitoring system are reported.	Comply
17638 Special Occurrences	There was a log of special occurrences.	Comply
17639 Inspection of Records	Records were available during normal business hours.	Comply
Disposal Site Personnel:		
17646 Availability	There were 2-3 equipment operators, a scalehouseman, a foreman and a supervisor on site. I did not see conditions which indicated a lack of staff.	Comply
17647 Training	A formal training program was being developed but had not yet been implemented. Future inspections should determine the adequacy of the implemented program.	Indeterminate

Facility Name: Sacramento City Landfill Facility ID No.:34-AD-004

Name of Inspector: Richard Hill Inspection Dates: 11/14-15, 85

Signature: Richard E. Hill

CAC Section:	Observations:	Conclusions:
17648 Supervision	A site supervisor on was site during my inspection.	Comply
17649 Site Attendant	The scalehouseman attends the landfill entry and a gatekeeper attends the compost entry, thus ensuring adequate control of the facility.	Comply
Disposal Site Improvements:		
17656 Identification Signs	The site lacks identification signs at the entry which are necessary because the site is open to the public through the compost operation, and because emergency vehicles need to be able to identify the site quickly.	Violation
17657 Entry Signs	The landfill operation lacks entry signs, but is closed to the public. The compost operation is open to the public and has entry signs.	Comply
17658 Site Security	The public has unrestricted access to the site from the American River levee. A transient lived on the levee and was observed on site.	Violation
17659 Access Roads	The access road was smooth and provided all weather access.	Comply

Facility Name: Sacramento City Landfill Facility ID No.:34-AD-004

Name of Inspector: Richard Hill Inspection Dates:11/14-15, 85

Signature: Richard E. Hill

CAC Section:	Observations:	Conclusions:
17660 Internal Roads	Roads used by the public are smooth and provide all weather access.	Comply
Disposal Site Health and Safety:		
17666 Sanitary Facilities	Showers and rest rooms are available on site.	Comply
17667 Water Supply	The site has municipal water supply for drinking water.	Comply
17668 Communications Facilities	There is a telephone on site. The county vehicles have radios. Phone # 449-5221	Comply
17669 Lighting	Adequate portable lighting was used at the site for low light operations. (Photo #1-5)	Comply
17670 Personnel Health and Safety	Landfill personnel were adequately protected from health and safety hazards on site. Heavy equipment had enclosed cabs. (Photo #6, #3-4)	Comply

Facility Name: Sacramento City Landfill Facility ID No.: 34-AD-004

Name of Inspector: Richard Hill Inspection Dates:11/14-15, 85

Signature: Richard E. Hill

CAC Section:	Observations:	Conclusions:
Disposal Site Operations:		
17676 Confined Unloading	Unloading was restricted to a wet weather pad that was large enough to handle the flow of vehicles without causing stacking while being as small as practical. (Photo #15, #16)	Comply
17677 Spreading and Compacting	Wastes were spread and compacted by a CAT and/or a compactor. The operation appeared to comply with the spreading and compacting conditions as specified in the RDSI. (Photo #6, #15, #16)	Comply
17678 Slopes and Cuts	The slope of the working face was not too steep to allow affective compaction. (Photo #6)	Comply
17679 Final Site Face	Finished slopes exceeded 70% as measured by inclinometer. The September 1984 compliance Plan requires maximum slopes of 17%.	Violation
17680 Stockpiling	The placement of stockpiled cover did not cause problems or interfere with other aspects of the facilities operation. (Photo #7, #16)	Comply

Facility Name: Sacramento City Landfill Facility ID No.:34-AD-004

Name of Inspector: Richard Hill Inspection Dates:

Signature: Richard E. Hill

CAC Section:	Observations:	Conclusions:
17681 Availability of cover	At least 3 months cover was stockpiled on site. (16,250 cubic yards are required). This equals a pile 100 yds x 30 yds x 5 yds). (Photo #16)	Comply
17682 Cover	The working face was covered within 24 hours. (Photo #18) There was daylighting of waste north of the wet weather pad. (Photo #9-12).	Violation
17683 Performance Standards	The site uses periodic cover instead of performance standards.	N/A
17684 Intermediate Cover	Future inspectors should verify that intermediate cover is applied to areas where waste is not deposited 180 days after this inspection.	Indeterminate

Facility Name: Sacramento City Landfill Facility ID No.: 34-AD-004

Name of Inspector: Richard Hill Inspection Dates: 11/14-15, 85

Signature: Richard E. Hill

CAC Section:	Observations:	Conclusions:
17685 Final Cover	I did not see conditions which lead me to believe that final cover was inadequate. (Photo #13-16)	Comply
17686 Scavenging	A transient lives along the river and was observed scavenging in the waste. (Photo #3, #7)	Violation
17687 Salvaging Permitted	Salvaging is not permitted and was not observed.	Comply
17688 Volume Reduction and Energy Recovery	A composting operation on site is is located away from the landfill operation and does not appear to interfere with other site operations.	Comply
17689 Processing Area	The composting operation is located in an area distinct from the landfill and transfer operation.	Comply
17690 Storage of Salvage	Compost is separated from the working face and arranged in a way that would not be expected to cause a fire hazard or nuisance.	Comply
17691 Removal	No maximum storage time has been defined in the RDSI or permit, or by the LEA.	Comply
17692 Non-Salvageable Items	I did not observe non-salvageable items salvaged.	Comply
Disposal Site Controls:		
17701 Nuisance Control	I did not observe conditions which were likely to cause a public nuisance.	Comply

Facility Name: Sacramento City Landfill Facility ID No.: 34-AD-004

Name of Inspector: Richard Hill Inspection Dates: 11/14-15, 8

Signature: Richard E. Hill

CAC Section:	Observations:	Conclusions:
17702 Animal Feeding	I did not observe animals feeding on waste.	Comply
17703 Fire Control	The site has a water truck and fire hydrants.	Comply
17704 Leachate Control	I did not observe leachate. The RWQCB and the LEA were reviewing water monitoring data to determine the need for leachate control systems. Vinyl chloride has been found on site in excess of the State's drinking water action levels (=2ppb). Wells #3 and #3B near the American River at the northeast corner of the site had greater than 6 ppb vinyl chloride. It has been suggested that these levels are caused by PVC well casings. Future inspections should consider monitoring results.	Indeterminate
17705 Gas Control	I found 0.9% combustible gas in the collection dispatch office. Additional testing should be conducted to determine whether a gas hazard exists, and whether a gas control system is needed.	Indeterminate
17706 Dust Control	No dust was observed.	Comply
17707 Vector and Bird Control	Gulls are abundant at this site, but did not cause a public nuisance and did not pose a hazard to aviation. (Photo #6, #7, #15, #16)	Comply

Facility Name: Sacramento City Landfill Facility ID No.:34-AD-004

Name of Inspector: Richard Hill Inspection Dates:11/14-15, 85

Signature: Richard E. Hill

CAC Section:	Observations:	Conclusions:
17708 Drainage and Erosion Control	I did not observe inadequate drainage systems. I did not see waste uncovered by erosion.	Comply
17709 Contact with Water	I did not observe water in direct contact with waste.	Comply
17710 Grading of Fill Surfaces	Ponds had formed on fill surfaces to the north of the wet weather area. Grading was insufficient to account for surface settlement.	Violation
17711 Litter Control	I saw only small amounts of litter not likely to be considered esthetically objectionable.	Comply
17712 Noise Control	Noise levels were not expected to cause a public nuisance.	Comply
17713 Odor Control	I did detect an odor that seemed to come from sewer manholes at the north-east corner of the expansion area. However, I could not detect this odor until I approached the area and did not believe that the level of the odor was likely to cause a public nuisance.	Comply
17714 Traffic Control	I observed a collection rig disregard the railroad automatic safety gate and drive between the gate arms rather than wait for the train to pass.	Violation

Facility Name: Sacramento City Landfill Facility ID No.: 34-AD-004

Name of Inspector: Richard Hill Inspection Dates: 11/14-15, 85

Signature: Richard E. Hill

CAC Section:	Observations:	Conclusions:
17715 Ponded Liquid	I did not see any ponds on site designed for leachate holding or control.	Comply
Disposal Site Equipment:		
17726 General	The equipment observed was consistent with the requirements listed in the RDSI.	Comply
17727 Standby Equipment	Steve Wolf Equipment Rental is listed in the compliance schedule as a standby equipment supplier on contract to the facility.	Comply
Disposal Site Maintenance:		
17731 General	Because the facility was found in violation of section 17732 (operating Site Maintenance) future inspections should verify that a written preventive maintenance program exists and is utilized.	Indeterminate
17732 Operating Site Maintenance	The site was found in violation of section 17658 (site security), 17679 (Final Site Face), 17710 (grading of fill surfaces) and 17684 (Intermediate cover). The site was not monitoring and/ or promptly repairing or correcting deteriorated or defective conditions with respect to these standards.	Violation
17733 Insp. on Completion	N/A. The site is not closed.	N/A
17734 Completed Site Maintenance	N/A. The site is not closed.	N/A

Facility Name: Sacramento City Landfill Facility ID No.: 34-AD-004

Name of Inspector: Richard Hill Inspection Dates: 11/14-15, 85

Signature: Richard E. Hill

CAC Section:	Observations:	Conclusions:
17735 Recording	Future inspections should verify that boundary data has been recorded with the county recorder.	Indeterminate
Disposal Site Special Wastes:		
17741 Burning Wastes	No burning waste was observed.	Comply
17742 Hazardous Wastes	The site receives infectious waste, which was observed daylighting through cover. (Photo #9-12)	Violation
17743 Liquid Waste	No liquid wastes were received.	Comply
17744 Dead Animals	No dead animals were observed.	Comply
Disposal Site Reports and Reviews:		
17751 Periodic Site Review	A revised permit was issued in 1984.	Comply

Notes:

C! Y OF SACRAMEN O

DEPARTMENT OF PUBLIC WORKS

SOLID WASTE DIVISION

JOHN F. BOSS
Solid Waste Division Manager

May 22, 1986

Mr. John K. Bell, Manager
Monitoring Section
California Waste Management Board
1020 Ninth Street, Suite 300
Sacramento, CA 95814

Dear John,

The City recently received the report of the inspection your staff conducted on November 14 and 15, 1985 at the City's landfill site. We believe the site's operation has steadily improved, and in general complies with the criteria for sanitary landfilling. I would assume that a more timely notice than six (6) months after inspection of health related standards, violations would have been sent to the City if the site is a health problem. The City is in the process of reviewing the notices of violation and will respond to each shortly. Many have been corrected, and requests for funds to correct others are in the proposed 1986/87 budget.

You can be assured that the City of Sacramento will take all necessary steps to operate the landfill as a "good neighbor".

Sincerely,

Chris Choate /for

John F. Boss
Solid Waste Division Manager

JFB/myw (Bell:a:JB1)

cc: Melvin H. Johnson, Director, Public Works
Reginald Young, Deputy Director, Public Works
Chris Choate, Chief, Solid Waste Disposal
Ken Stuart, Environmental Health-County of Sacramento

1231 I Street, Suite 103 SACRAMENTO, CA 95814 (916) 449-5757

STATE OF CALIFORNIA

GEORGE DEUKMEJIAN, Governor

CALIFORNIA WASTE MANAGEMENT BOARD
1020 NINTH STREET, SUITE 300
SACRAMENTO, CA - 95814

MAY 28 1986

Mr. John F. Boss
Solid Waste Division Manager
City of Scacrmanto Department
of Public Works
1231 "I" Street, Suite 103
Sacramento, CA 95814

Subject: Sacramento City Landfill 34-AD-004

Dear John:

In reference to your May 22, 1986 letter, it is always gratifying to hear that a landfill will be operated as a "good neighbor" in a community. Also it is encouraging that the City is in the process of reviewing and responding to our notices of violation from our inspection of the Sacramento City Landfill. As a result, I am sure future inspections will reflect your good efforts.

Sincerely,

SIGNED AND SENT

John K. Bell, Manager
Monitoring Section

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JUL 28 1986

CITY OF SACRAMENTO

DEPARTMENT OF PUBLIC WORKS

SOLID WASTE DIVISION

JOHN F. BOSS
Solid Waste Division Manager

July 25, 1986

California Waste Management Board
1029 9th Street, Suite 300
Sacramento, CA 95608

ATTN: Mr. George Eowan, Executive Officer

Dear Mr. Eowan:

During 1985 the California Waste Management Board issued a report compiling the status of landfill capacity in California. At that time the City of Sacramento Landfill was listed as closing within 18 months. Subsequent to the compilation of information for that report, several significant items have transpired which should be reflected in your next report:

1. The City has received permits for and constructed a landfill expansion immediately adjacent to the existing landfill.

2. The landfill expansion, and the need to provide a minimum 3% slope for closure, will provide capacity in the City's landfill until 1990.

3. Neighboring citizens, although still not happy with a landfill nearby, have indicated that operations have improved considerably, to the extent they no longer oppose the landfill. In fact, the neighborhood advisory committee opposed plans to accelerate closure by bringing in waste at a higher rate.

4. Noncompliance with minimum standards has been eliminated according to inspections by your staff and the Local Enforcement Agency, except for access control compliance. The City has budgeted about $30,000 to build a 3,000 foot fence to correct this deficiency, with contract specifications currently being prepared.

Please pass this information on to the appropriate staff person responsible for any updates to this report. Thank you for your assistance.

Sincerely,

John F. Boss
Solid Waste Division Manager

cc: Reginald Young, Deputy Director, Public Works

335

1231 I Street, Suite 103 SACRAMENTO, CA 95814 (916) 449-5757

STATE OF CALIFORNIA

GEORGE DEUKMEJIAN, Governor

CALIFORNIA WASTE MANAGEMENT BOARD
1020 NINTH STREET, SUITE 300
SACRAMENTO, CA 95814

AUG 07 1986

To: Mr. John Boss, Manager
City of Sacramento Public Works, Solid Waste Division
1231 "I" Street, Suite 103
Sacramento, CA 95814

Subject: Report of inspection: Sacramento City Landfill
34-AD-04

Government Code Section 66796.38 requires the California Waste Management Board (Board) to conduct inspections of solid waste facilities for the purpose of evaluating compliance with the State Standards for Solid Waste Handling and Disposal (Title 14. California Administrative Code, Division 7 Chapter 3, commencing with section 17200). Under this program, each facility will be inspected at least three separate times. As you are aware by now, staff has already conducted two of these inspections at the subject facility. The dates of those inspections were 11/14-15/85 and 6/23/86. A report resulting from the recent inspection is enclosed. If photographs are referred to in the inspection report, copies will be obtainable upon written request.

The goal of our inspection program is to verify compliance with each of the State Minimum Standards, not merely to find violation(s) of these standards. In order to achieve this we will, as I stated above, be inspecting each facility at least three times. This will provide the following advantages over the previous inspection techniques:

* The program will provide greater fairness to operators of facilities by reducing the possibility that one operator will be inspected under adverse conditions and another under favorable conditions.

* The program will allow for evaluation of conditions, which show seasonal variations such as effectiveness of leachate control systems, vectors, dust, etc.

* The program will provide a track record of compliance which will be used in evaluating standards for which a single violation may not be sufficient reason to place the facility on the State List of Non-Complying Facilities when the facility is generally in compliance with that standard, i.e., the daily cover standard.

Although we do not intend to provide advance notice of the inspection dates to operators, the Local Enforcement Agency (LEA) will be notified of those dates, and will be invited to accompany our staff on the inspection.

If, after three inspections, your facility continues to be operating in violation of one or more of the State Minimum Standards you will be notified of this finding by certified letter. A copy of that letter will be sent to the LEA. After 90 days or upon notification of correction of all violations(s), Board staff will reinspect the facility. If the facility is still in violation, staff will notify you and the LEA, by certified letter of staff's intent to recommend that the Board place the facility's name on the State List of Non-Complying Facilities at a regularly scheduled meeting of the Board. Should the Board place the facility on that list, State law (Government Code 66796.39) requires that the LEA develop a compliance schedule for correction of the violation(s). If compliance is not achieved within one year, Government Code section 66796.39 directs LEAs to revoke facility operating permits. If the facility is closed or abandoned, staff will recommend that the LEA issue a notice of violation and an order to correct the violations. That Notice and Order will also notify you or the owner of the facility that State law provides that "the unremedied condition of the facility is prima facie evidence of negligence, and in any action for damages against the owner of the property for injury caused by the unremedied condition, the burden of proving the injury was not caused by an unremedied condition shall be on the owner of the property".

If you have any questions regarding the program, please contact me at (916) 322-1769.

Sincerely,

John K. Bell, Manager
Monitoring Section

cc: Mr. Art Seipel, Sacramento County Environmental Health

mea

CALIFORNIA WASTE MANAGEMENT BOARD

DISPOSAL SITE
EVALUATION REPORT

Facility Name: Sacramento City Landfill **Facility ID No.:** 34-AD-04

Name of Inspector: P. Badger **Inspection Dates:** 6/23/86

Signature: P. Badger

CAC Section:	Observations:	Conclusions:
Disposal Site Information:		
17616 Report of Disposal Site Information	The RDSI appeared to address all the issues outlined in section 17616.	Comply
Design Responsibility:		
17626 Design Responsibility	This standard applies to new facilities only.	N/A
17627 Ultimate Use	The ultimate use of this facility has been designated as a recreational/park site.	Comply
17628 General Design Parameters	The site design accounted for all factors in Section 17628.	Comply
17629 Public Health Design Parameters	The design appeared to meet the criteria listed in Section 17629.	Comply
17636 Weight/Volume Records	The facility has adequate weight/volume records, however, it should be noted that the tonnage received significantly exceeds the permitted volume. See the NOTES section at the end of this report.	Comply

Section Manager JKB

Facility Name: Sacramento City Landfill **Facility ID No.:** 34-AD-04

Name of Inspector: P. Badger **Inspection Dates:** 6/23/86

Signature: P. Badger

CAC Section:	Observations:	Conclusions:
17637 Subsurface Records	Subsurface records were maintained by the operator.	Comply
17638 Special Occurrences	A log of special occurrences was maintained.	Comply
17639 Inspection of Records	Records were available during normal business hours.	Comply
Disposal Site Personnel:		
17646 Availability	No operation appeared to be restricted by a lack of personnel.	Comply
17647 Training	Training was of the on-the-job type. No activity appeared to be restricted by a lack of training.	Comply
17648 Supervision	There were supervisory personnel on site. I did not see any conditions I felt were due to a lack of supervision.	Comply
17649 Site Attendant	The site was attended during operating hours.	Comply
Disposal Site Improvements:		
17656 Identification Signs	The site lacks idenification signs at the point of access from the public road. As the compost operation is open to the public, these signs are required.	Violation
17657 Entry Signs	The landfill does not require entry signs, as it is not open to the public. The composting operation has the required entry signs.	Comply

Facility Name: Sacramento City Landfill **Facility ID No.:**34-AD-04

Name of Inspector: P. Badger **Inspection Dates:** 6/23/86

Signature: P. Badger

CAC Section:	Observations:	Conclusions:
17658 Site Security	The public has unrestricted access to to the site from the American River Levee. There is a man who lives on the bank of the river adjacent to the landfill. He scavenges through the waste daily. (See slides #1.1-2, 1.4-5. The public also has 24-hour access to the old section of fill next to the railroad tracks because the fence here only goes around the site part way. The road along the tracks allows easy access to this unfenced area.	Violation
17659 Access Roads	Roads were smooth and allowed good access to the site. I did not see excessive dust or tracking.	Comply
17660 Internal Roads	Internal roads were smooth and allowed good access to the unloading areas. Roads were suitably signed.	Comply
Disposal Site Health and Safety:		
17666 Sanitary Facilities	Sanitary facilities were available on site.	Comply
17667 Water Supply	Drinking water was supplied.	Comply
17668 Communications Facilities	There were phones on site. Phone #: (916) 449 -5221	Comply
17669 Lighting	In the summer, this site does not operate during hours of darkness. The site rents adequate portable lighting October through March.	Comply

Facility Name: Sacramento City Landfill **Facility ID No.:** 34-AD-04

Name of Inspector: P. Badger **Inspection Dates:** 6/23/86

Signature: P. Badger

CAC Section:	Observations:	Conclusions:
17670 Personnel Health And Safety	Safety equipment and supplies were available to employees. The LEA did not require that specific safety items be used.	Comply
Disposal Site Operations:		
17676 Confined Unloading	The unloading area was reasonably confined.	Comply
17677 Spreading and Compacting	Waste was adequately spread and compacted.	Comply
17678 Slopes and Cuts	The slope of the working face was of an angle that appeared to allow effective compaction by the type of vehicles used.	Comply
17679 Final Site Face	Final site faces had a neat and finished appearance and was of an acceptable slope.	Comply
17680 Stockpiling	Stockpiling did not interfere with other site activities.	Comply
17681 Availability of Cover	Cover comes from off site city and private construction projects. I did not see any conditions indicating there may be a lack of cover material.	Comply
17682 Cover	Daily cover was applied.	Comply
17683 Performance Standards	This was not a performance standard site.	N/A

Facility Name: Sacramento City Landfill **Facility ID No.:**34-AD-04

Name of Inspector: P. Badger **Inspection Dates:** 6/23/86

Signature: P. Badger

CAC Section:	Observations:	Conclusions:
17684 Intermediate Cover	It appeared that intermediate cover was applied where appropriate.	Comply
17685 Final Cover	A portion of the fill between the active area and the permanent buildings is slated for final cover in the immediate future. Subsequent inspectors should check on the progress of these plans.	Comply
17686 Scavenging	The man mentioned in Section 17658, Site Security, was observed scavenging during this inspection. No attempts were made on the part of equipment operators to remove the man.	Violation
17687 Salvaging permitted	There was no salvage operation on this site.	N/A
17688 Volume Reduction and Energy Recovery	There was a composting operation on this site. It was conducted in a controlled manner and did not interfere with other site operations.	Comply
17689 Processing Area	The composting area was separate from the rest of the landfill.	Comply
17690 Storage of Salvage	There was no salvaging operation on this site.	Comply
17691 Removal	There was no salvaging operation on this site.	Comply
17692 Non-Salvageable Items	I did not observe the salvage of any items considered non-salvageable by this section.	Comply

Facility Name: Sacramento City Landfill **Facility ID No.:** 34-AD-04

Name of Inspector: P. Badger **Inspection Dates:** 6/23/86

Signature: P. Badger

CAC Section:	Observations:	Conclusions:
Disposal Site Controls:		
17701 Nuisance Control	The operation did not appear to be likely to cause a public nuisance.	Comply
17702 Animal Feeding	I did not observe animals feeding on waste.	Comply
17703 Fire Control	The site had appropriate fire fighting equipment. I did not observe any fires or see evidence of recent fires.	Comply
17704 Leachate Control	Since 1984 the site has experienced what the Regional Water Quality Control Board (RWQCB) considers to be a significant increase in several indicator parameters of groundwater contamination. Vinyl chloride has also been detected in 7 of the 10 monitoring wells in the past year. In March, 1986, RWQCB and City staff met and agreed the water quality had not deteriorated to levels warranting immediate remedial activities. Two major programs are to be performed to address water quality at the site; a monitoring program, and an assessment program, both for ground and surface water. Larry Nash of the RWQCB feels that the City's efforts to comply and cooperate are in good faith. Subsequent inspectors should continue to monitor the progress of the programs, as outlined in the "City of Sacramento Closure Plan for 28th Street Sanitary Landfill, June 1986."	Indeterminat
17705 Gas Control	I tested for gas at the monitoring wells along the "A" Street railroad tracks and in the dispatch office on site. I did not detect any measurable gas.	Comply

Facility Name: Sacramento City Landfill **Facility ID No.:** 34-AD-04

Name of Inspector: P. Badger **Inspection Dates:** 6/23/86

Signature: P. Badger

CAC Section:	Observations:	Conclusions:
17706 Dust Control	A water truck was actively controlling dust. Minor amounts of dust observed was not likely to cause a public nuisance.	Comply
17707 Vector and Bird Control	I did not observe vectors on site. The small number of birds observed were not likely to cause a hazard to aviation or a public nuisance.	Comply
17708 Drainage and Erosion Control	There were several sections of the fill near the expansion area where cover was eroding. No waste was exposed. One area of extreme erosion completely isolated one of the leachate monitoring towers in the expansion area, making access to it dangerous or impossible. (See slides #1.10, 1.12 and 1.14).	Violation
17709 Contact with Water	I did not observe waste in contact with water.	Comply
17710 Grading of Fill Surfaces	Grading appeared adequate to account for settlement and promote lateral runoff. I saw 2 areas of the fill where there was evidence that there had been ponding last winter. Subsequent inspectors should evaluate this section carefully. (See slides #1.17 and 1.18).	Comply
17711 Litter Control	I did not observe accumulations of litter which were likely to cause a public nuisance.	Comply
17712 Noise Control	Noise levels did not seem likely to cause a public nuisance.	Comply

Facility Name: Sacramento City Landfill **Facility ID No.:** 34-AD-04

Name of Inspector: P. Badger **Inspection Dates:** 6/23/86

Signature: P. Badger

CAC Section:	Observations:	Conclusions:
17713 Odor Control	Art Seipel of the Sacramento County Health Department said there had been some recent odor complaints. I did not feel the landfill was a source of odors during my inspection. Subsequent inspectors should carefully evaluate this section.	Comply
17714 Traffic Control	Traffic flow did not appear likely to cause a public safety hazard and I did not observe vehicles stacking onto public roads.	Comply
17715 Ponded Liquid	This site did not have any ponded liquid.	Comply
Disposal Site Equipment:		
17726 General	The numbers and types of equipment on site were consistent with requirements listed in the RDSI.	Comply
17727 Standby Equipment	Adequate standby equipment was available on site.	Comply
Disposal Site Maintenance:		
17731 General	Equipment and facility maintenance programs appeared adequate.	Comply
17732 Operating Site Maintenance	The site was found to be in violation of three maintenance related sections; Section 17656 (I.D. Signs), 17658 (Site Security), and Section 17708 (Drainage and Erosion Control). Sections 17656 and 17658 were cited as violations during the previous inspections as well. This constitutes and an operating site maintenance violation.	Violation

Facility Name: Sacramento City Landfill **Facility ID No.:** 34-AD-04

Name of Inspector: P. Badger **Inspection Dates:** 6/23/86

Signature: P. Badger

CAC Section:	Observations:	Conclusions:
17733 Insp. on Completion	The site has not closed.	N/A
17734 Completed Site Maintenance	The site has not closed.	N/A
17735 Recording	This is a grandfathered site.	N/A
Disposal Site Special Wastes:		
17741 Burning Wastes	I did not observe burning wastes. There was space available for spreading and extinguishing burning waste.	Comply
17742 Hazardous Wastes	The site has not received infectious wastes since January 1, 1986, according to Ken Koppinger, Senior Landfill Operator. No hazardous wastes were seen by this inspector.	Comply
17743 Liquid Wastes	This site does not accept liquid wastes. I did not abserve any liquid waste disposal.	Comply
17744 Dead Animals	I did not observe dead animals being received.	Comply
Disposal Site Reports and Reviews:		
17751 Periodic Site Review	This site underwent an engineering site reveiw in 1985.	Comply

Facility Name: Sacramento City Landfill **Facility ID No.:**34-AD-04

Name of Inspector: P. Badger **Inspection Dates:** 6/23/86

Signature: P. Badger

CAC Section:	Observations:	Conclusions:

Notes:

During parts of this inspection I was accompanied by John Rowden and Bill Orr of the California Waste Management Board, Chris Choate and Ken Koppinger of the City of Sacramento Solid Waste Department, and Art Seipel of the Sacramneto County Health Department. The weather was hot with little breeze.

Article 2, Section 66796.30 of the Government Code requires a revised permit before a significant change occurs. The site is in violation of its permit because it accepts significantly more waste than allowed by the permit or RDSI. (See Section 17636). The reported tonnage for 1985, as stated in the closure plan, is approximately 711 TPD. Tonnage for January, February, and March, 1986, was 719, 709, and 834 TPD, respectively. The permitted tonnage is 600 TPD.

SWIS-09 (REV. 1/85)

NOTICE OF INSPECTION DISPOSAL SITE

LOCAL ENFORCEMENT AGENCY: Sacramento County Env. Health

CITY FILE NUMBER (COUNTY - LEA - DIVISION)	SWIS NUMBER (COUNTY - SITE)	INSPECTION DATE (MO. DAY YR.)	T-OUT	TOTAL TIME (MINIMUM HOURS)
34 - AD - 36		(last) 6-25-96	T-IN	(last) 4

FACILITY NAME: Sacramento City Landfill

FACILITY LOCATION: Sacramento

INSPECTOR: Bauer

ALSO PRESENT: Kirsten, EH; C. Choate, A. Seimel

RECEIVED BY:

Operator _____

Owner _____

Comments: The site lacks TD signs required by law. Site is not secure to unauthorized entry. Scavenging observed. Leachate control - indeterminant conclusion, see report. Several unused wells. Large # of maintenance related violations.

IND = indeterminate

	*V	C
(3011) RECORDS		
ACCURATE WEIGHT/VOLUME RECORDS MAINTAINED 17636		
ADEQUATE SUBSURFACE RECORDS MAINTAINED 17637		
LOG OF SPECIAL OCCURRENCES MAINTAINED 17638		
RECORDS AVAILABLE FOR INSPECTION 17639		
(3021) PERSONNEL		
ADEQUATE NUMBER OF QUALIFIED PERSONNEL AVAILABLE 17646		
PERSONNEL ADEQUATELY TRAINED 17647		
ADEQUATE SUPERVISION PROVIDED 17648		
SITE ATTENDANT AVAILABLE FULL-TIME OR AS DETERMINED BY LEA 17649		
(3031) SIGNS		
IDENTIFICATION SIGNS AT EACH POINT OF ACCESS 17656		
ENTRY SIGN STATES FEES, HOURS OF OPERATION, WASTES ACCEPTED/NOT ACCEPTED 17657		
NON-HAZARDOUS UNATTENDED SITES HAVE SIGN WARNING USERS OF UNAVAILABILITY OF COMMUNICATION FACILITIES 17658		
(3041) SECURITY		
ADEQUATE PERIMETER SECURITY, HAZARDOUS AREAS FENCED AND IDENTIFIED 17695		
(3051) ROADS		
ACCESS ROADS HAVE SMOOTH SURFACE, MINIMIZE DUST AND TRACKING OF MUD, AND ALLOW ALL-WEATHER ACCESS 17699		
INTERNAL ROADS IN SAFE CONDITION, PROVIDE ACCESS DURING INCLEMENT WEATHER, AND ARE PROVIDED WITH DIRECTIONS 17690		
(3071) SANITATION		
ADEQUATE SANITARY FACILITIES AVAILABLE 17666		
SAFE ADEQUATE DRINKING WATER AVAILABLE 17667		
(3081) COMMUNICATIONS		
COMMUNICATION FACILITIES AVAILABLE WHERE HAZARDOUS WASTES ARE ACCEPTED 17668		
(3091) LIGHTING		
LIGHTING ADEQUATE 17669		
(3101) SAFETY		
SAFETY EQUIPMENT IN USE AND BEING WORN 17670		

	V	C
(3111) CONFINED UNLOADING		
UNLOADING ADEQUATELY CONFINED 17676		
(3141) SPREADING/COMPACTING		
SPREADING AND COMPACTION IN TWO-FOOT LAYERS 17677		
(3151) SLOPES/CUTS/GRADING		
WORKING FACE SLOPES ALLOW EFFECTIVE COMPACTION. DEPTH OF CUTS AND SLOPES OF TRENCH SIDES AS APPROVED BY LEA 17678		
FINAL SLOPES HAVE NEAT APPEARANCE AND ARE 1-1/4 : 1 OR FLATTER 17679		
GRADING OF FILL SURFACES ADEQUATE 17719		
(3161) COVER		
STOCKPILING OF COVER DOES NOT INTERFERE WITH OPERATIONS 17680		
SUITABLE QUALITY AND SUPPLY OF COVER MATERIAL AVAILABLE 17681		
COVER PROVIDED AT REQUIRED DEPTH AND FREQUENCY 17682		
INTERMEDIATE COVER PROVIDED AT REQUIRED DEPTH AND FREQUENCY 17684		
FINAL COVER PROVIDED AS REQUIRED 17688		
(3171) SALVAGING/PROCESSING		
SCAVENGING PROHIBITED 17686		
SALVAGING DOES NOT INTERFERE WITH OPERATIONS 17687		
VOLUME REDUCTION AND ENERGY RECOVERY DO NOT INTERFERE WITH OPERATIONS OR CREATE HEALTH, SAFETY OR ENVIRONMENTAL PROBLEMS 17688		
SALVAGING AND VOLUME REDUCTION CONFINED TO CLEARLY IDENTIFIED AREAS 17689		
SALVAGE STORAGE LOCATION OR VOLUME AS APPROVED BY LEA, MINIMIZES FIRE, NUISANCE 17690		
SALVAGE STORAGE TIME DOES NOT RESULT IN HEALTH OR FIRE PROBLEMS 17691		
SALVAGED MATERIALS APPROVED BY LEA AND LOCAL HEALTH 17692		
(3181) NUISANCE		
OPERATIONS DO NOT CREATE A PUBLIC NUISANCE 17701		
FEEDING OF REFUSE TO ANIMALS FOR HUMAN CONSUMPTION PROHIBITED 17702		

	V	C
(3191) FIRE		
FIRE CONTROL ADEQUATE 17703		
(3192) FIRE (P)		
BURNING MATERIALS SPREAD AND EXTINGUISHED. LEA, SWMB NOTIFIED IMMEDIATELY OF FIRE NOT EXTINGUISHED IN 24 HOURS 17683		
(3201) LEACHATE		
ADEQUATE STEPS TAKEN TO MONITOR, COLLECT, TREAT, AND DISPOSE OF LEACHATES 17704		
NO WASTES IN DIRECT CONTACT WITH WATER EXCEPT AS APPROVED BY RWQCB 17705		
(3202) LEACHATE (P)		
REFUSE COVERED WITH NEXT DAY'S REFUSE OR WITH SIX INCHES OF COMPACTED SOIL. TOTAL AREA OF EXPOSED REFUSE IS AS SPECIFIED FOR WET AND DRY SEASONS 17693		
(3211) GAS		
GAS MONITORING AND CONTROL AS REQUIRED 17706		
(3221) DUST		
DUST CONTROL ADEQUATE 17709		
(3231) VECTORS/BIRDS		
VECTOR AND BIRD CONTROL ADEQUATE 17707		
LIQUID PONDS MINIMIZE VECTOR PROPAGATION 17710		
(3232) VECTORS (P)		
THRESHOLD VALUES FOR VECTOR POPULATIONS NOT EXCEEDED 17693		
(3241) DRAINAGE/EROSION		
DRAINAGE AND EROSION CONTROL ADEQUATE 17708		
(3251) LITTER		
LITTER CONTROL ADEQUATE 17711		
(3252) LITTER (P)		
LITTER NOT ALLOWED TO MIGRATE OFF-SITE 17693		
(3261) NOISE		
NOISE CONTROL ADEQUATE 17712		
(3271) ODOR		
ODOR CONTROL ADEQUATE 17713		
(3272) ODOR (P)		
AMBIENT AIR AT OR BEYOND FACILITY BOUNDARY IS NOT ODOROUS 17693		

	V	C
(3281) TRAFFIC		
TRAFFIC CONTROL ADEQUATE WITHIN SITE. TRAFFIC MINIMIZES INTERFERENCE, SAFETY PROBLEMS, AND STACKING ON PUBLIC ROADS 17714		
(3291) EQUIPMENT		
EQUIPMENT ADEQUATE IN TYPE, CAPACITY, AND NUMBER, AND IS ADEQUATELY MAINTAINED 17715		
STANDBY EQUIPMENT AVAILABLE TO COMPLY WITH SEC. 17682 AND OTHER SECTIONS 17687		
(3301) MAINTENANCE		
EFFECTIVE MAINTENANCE PROCEDURES AND PROGRAMS DEVELOPED AND UTILIZED 17731		
ADEQUATE MONITORING AND REPAIR OF DETERIORATED CONDITIONS 17732		
(3311) CLOSURE		
AFTER CLOSURE, IF LEACHATE, EXTENSIVE SURFACE CRACKING OR SETTLEMENT OCCURS, THE OWNER SHALL NOTIFY LEA AND SHALL MONITOR AND REPAIR SITE FOR A PERIOD OF 5 YEARS OR LONGER 17734		
UPON SITE CLOSURE, DETAILED DESCRIPTION MUST BE FILED WITH THE LEA AND WITH THE COUNTY RECORDER 17733		
(3321) SPECIAL WASTES		
BURNING WASTES IMMEDIATELY SPREAD AND EXTINGUISHED IN SAFE AREA 17741		
SITE ACCEPTS ONLY APPROVED HAZARDOUS WASTES AND TAKES PRECAUTIONS TO ELIMINATE OR CONTROL HARMFUL DUSTS, FUMES, MISTS, VAPORS, OR GASES 17742		
LIQUID WASTES APPROVED BY RWQCB, LOCAL HEALTH ENTITY AND LEA 17743		
DEAD ANIMALS ALLOWED BY LOCAL REGULATIONS 17744		
(3331) OTHER		

*V = Violation
C = Compliance

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DISTRIBUTION: WHITE — CWMB YELLOW — OPERATOR PINK — LEA

STATE OF CALIFORNIA

GEORGE DEUKMEJIAN, Governor

CALIFORNIA WASTE MANAGEMENT BOARD
1020 NINTH STREET, SUITE 300
SACRAMENTO, CA 95814

AUG 19 1985

Mr. John F. Boss
Solid Waste Division Manager
Department of Public Works
Sacramento, CA 95814

Dear Mr. Boss:

I would like to thank you for your letter of July 25th advising me of the current status and activities at the City of Sacramento Landfill.

I have referred the information you provided to those members of Board staff who have been following the progress the City is making in upgrading its landfill operations.

Again, I appreciate your keeping me updated on an activity which receives much interest.

Sincerely,

Original signed by:
George T. Eowan

George T. Eowan
Executive Officer

mea

CITY OF SACRAMENTO

DEPARTMENT OF PUBLIC WORKS

SOLID WASTE DIVISION

JOHN F. BOSS
Solid Waste Division Manager

October 1, 1986

Mr. John K. Bell
Manager, Monitoring Section
California Waste Management Board
1020 Ninth Street, Suite 300
Sacramento, CA 95814

Dear Mr. Bell:

The City of Sacramento has received the results of the second Disposal Site Evaluation conducted by your staff on June 23, 1986. Your staff inspector, Ms. Pam Badger found the facility in violation of several State Minimum Standards for Solid Waste Handling and Disposal. The City is actively rectifying the violations. Attached is a summary of corrective action status. We trust the activities completed and/or planned by the City will meet the Board's satisfaction.

Should you have any questions, please contact Chris Choate, Chief, Solid Waste Disposal, at 449-5720.

Yours very truly,

John F. Boss
Solid Waste Division Manager

JFB/myw (86059)

cc: Melvin H. Johnson, Director, Public Works
Reginald Young, Deputy Director, Public Works
Chris Choate, Chief, Solid Waste Disposal
Art Seipel, Sacramento County, Environmental Health

350

1231 I Street, Suite 103 SACRAMENTO, CA 95814 (916) 449-5757

STATUS OF CORRECTIONS OF VIOLATIONS
NOTED 6/23/86

1. Violation: Section 17656 - Identification Signs
"The site lacks identification signs at the point of access from the public road. As the compost operation is open to the public, these signs are required."

Status of Corrective Measure

A sign will be placed at the corner of 28th and "C" Street identifying the compost area and its operating hours. The sign has been ordered and will be in place during October, 1986.

2. Violation: Section 17685 - Site Security
"The public has unrestricted access to the site from the American River Levee. There is a man who lives on the bank of the river adjacent to the landfill. He scavenges through the waste daily. The public also has 24-hour access to the old section of fill next to the railroad tracks because the fence here only goes around the site part way. The road along the tracks allows easy access to this unfenced area."

Status of Corrective Measure

The construction documents have been completed for the installation of a chain-link fence along the American River Levee. The contract for the work is scheduled to be awarded October 21, 1986, with construction to begin October 27, 1986 and end by November 28, 1986. This project schedule is constrained by normal local government procurement procedures.

3. Violation: Section 17686 - Scavenging
"The man mentioned in Section 17658, Site Security, was observed scavenging during this inspection. No attempts were made on the part of equipment operators to remove the man."

Status of Corrective Measure

The construction of a security fence by November 28, 1986 will provide positive access control to inhibit the entry for the transient who lives on the bank of the American River adjacent to the river. Operators have been instructed to call the police to remove the trespasser whenever this person is noticed during operating hours. The site security guard also has been informed to watch for this individual.

4. Violation: Section 17708 - Drainage and Erosion Control
"There were several sections of the fill near the expansion area where cover was eroding. No waste was exposed. One area of extreme erosion completely isolated one of the leachate monitoring towers in the expansion area, making access to it dangerous or impossible."

Status of Corrective Measure

The landfill surface is currently being regraded to promote proper storm water run-off. Low area will be filled with a portion of the 400,000 cy of soil which will be delivered to the site starting in late September. The extremely eroded area which completely isolated the groundwater dewatering sump tower will be repaired by September 26, 1986.

5. Violation: Section 17732 - Operating Site Maintenance
"The site was found to be in violation of three maintenance related sections; Section 17656 (Identification Signs), 17658 (Site Security), and Section 17708 (Drainage and Erosion Control). Sections 17656 and 17658 were cited as violations during the previous inspections as well. This constitutes an operating site maintenance violation."

Status of Corrective Measure

With the completion and installation of an identification sign, the installation of the access control fence, the regrading of the site, and repair of erosion area, the site should be found in compliance with these regulations.

STATE OF CALIFORNIA

GEORGE DEUKMEJIAN, Governor

CALIFORNIA WASTE MANAGEMENT BOARD
1020 NINTH STREET, SUITE 300
SACRAMENTO, CA 95814

OCT 28 1986

Mr. John F. Boss, Manager
Solid Waste Division
Department of Public Works
City of Sacramento
Sacramento, CA 95814

Dear Mr. Boss:

We are in receipt of your letter of October 1, 1986 advising us of the activities the City is conducting to correct items which were found in violation of the State Minimum Standards on the second Disposal Site Evaluation which was conducted on June 23, 1986.

We appreciate being kept up-to-date on progress being made on activities at the landfill and look forward to a continued constructive relationship with the professional staff of the City's Solid Waste Division.

Sincerely,

SIGNED AND SENT
John K. Bell, Manager
Monitoring Section

cc: Art Seipel, R.S., Sacramento County Health Department

mea

STATE OF CALIFORNIA GEORGE DEUKMEJIAN, Governor

CALIFORNIA WASTE MANAGEMENT BOARD
0 NINTH STREET, SUITE 300
CRAMENTO, CA 95814

FEB 24 1987

To: Mr. John Boss, Manager
City of Sacramento Public Works
1231 "I" Street, Suite 103
Sacramento, CA 95814

Subject: Report of inspection: Sacramento City Landfill
34-AD-0004

Government Code Section 66796.38 requires the California Waste Management Board (Board) to conduct inspections of solid waste facilities for the purpose of evaluating compliance with the State Standards for Solid Waste Handling and Disposal (Title 14. California Administrative Code, Division 7 Chapter 3, commencing with section 17200). Under this program, each facility will be inspected at least three separate times. As you are probably aware, the subject facility received its third inspection on January 26, 1987. Enclosed please find the Evaluation Report resulting from this third inspection. Copies of photographs or slides referred to in the report are available from the Board upon written request.

Results of the three field inspections along with all pertinent supporting data in our files have now undergone staff review. A final staff report is currently being prepared and will be sent to you as soon as possible. The following repeated and/or uncorrected violations of State Minimum Standards were identified during our evaluation:

17658 - Site Security

17682 - Cover

17686 - Scavenging

17708 - Drainage and Erosion Control

17710 - Grading of Fill Surfaces

17732 - Operating Site Maintenance

At the March meeting of the California Waste Management Board tentatively scheduled for March 26-27, 1987 staff will present its final evaluation report to the Board. The Board will consider whether they wish to issue a letter notifying you of the Board's intent to place the subject facility on the State List of Non-Complying Facilities unless specified corrective measures are implemented.

You and the Local Enforcement Agency are invited to address the Board with any information you feel the Board should consider at its March meeting. A notice of the meeting will be sent at least 10 days prior to the scheduled date.

A copy of this letter and the enclosed report will be sent to the LEA. If you have any questions regarding this program, please contact me at (916) 322-6172.

Sincerely,

Kerry D. Jones

Kerry D. Jones, Chief
Enforcement Division
Enclosure

Art Seipel, Sacramento County Environmental Health

Tim Crandell, Regional Water Quality Control Board - CVR

mea

CALIFORNIA WASTE MANAGEMENT BOARD

SOLID WASTE FACILITY
EVALUATION REPORT

Facility Name: Sacramento City Landfill Facility ID No.: 34-AD-0004

Name of Inspector: Neil Sherman Inspection Dates: 1/26/87

Signature: Neil Sherman

LEGEND

C = Compliance V = Violation
I = Indeterminate N = Not Applicable

CAC	SECTION	OBSERVATIONS	RESULT
		DISPOSAL SITE INFORMATION	
17616	Report of Disposal Site Information.	The Report of Disposal Site Information described the sites activities except for the following changes: - The RDSI states the hours of operations as 6:00 a.m. to 5:00 p.m. while the permit reads 6:00 a.m. to 3:30 p.m.. - Infectious waste is no longer accepted. - The vegetal processing plant is no longer in operation. These changes should be made.	C
		DESIGN RESPONSIBILITY.	
17626	Design Responsibility	This standard applies to new facilities only.	N

Section Manager JKB

CAC	SECTION	OBSERVATIONS	RESULT
17627	Ultimate Use.	The ultimate use of the site as specified in the 1984 Report of Disposal Site Information is listed as Solid Waste/Open Space/Park.	C
17628	General Design Parameters.	The site design accounted for all factors listed in Section 17628.	C
17629	Public Health Design Parameters	The site design met the criteria listed in Section 17629.	C
		DISPOSAL SITE RECORDS.	
17636	Weight/Volume Records.	I reviewed daily weight records at the Solid Waste Division Office at 1231 "I" Street. The above records included the number and type of vehicles entering the site, the time they entered, and the tonnages brought in. I also reviewed monthly and yearly records at the above location. Note: Tonnages for the year of 1986 averaged 682 TPD. 600 TPD is the permit.	C
17637	Subsurface Records.	Subsurface records including, soils, geology and groundwater, were listed in the 1984 Report of Disposal Site Information.	C
17638	Special Occurrences.	Special occurrences were submitted to the Local Enforcement Agency on a monthly basis. I observed the April 1986 report, to the Local Enforcement Agency, at the Solid Waste Division Office during normal business hours.	C
17639	Inspection of Records.	I observed the records noted above during normal business hours.	C

Inspector: Lee Thomas

CAC	SECTION	OBSERVATIONS	RESULT
		DISPOSAL SITE PERSONNEL.	
17646	Availability.	Personnel available to the site included: Two scale house attendants, four maintenance workers, five operators and a supervisor. The personnel working on the day of my inspection were qualified and were observed to properly operate the facility.	C
17647	Training.	Training was of the on-the-job type. I observed personnel working and no activities were restricted due to a lack of training. Continual training is provided through safety meetings, conferences, and visits to other landfills, according to Mr. Chris Choate, Site Supervisor.	C
17648	Supervision.	Mr. Chris Choate was the Supervisor on the day of my inspection. He said he is on site daily. I did not see any conditions I felt were due to a lack of supervision.	C
17649	Site Attendant.	The site was attended from 5:30 a.m. to the end of the working day on the day of my inspection.	C
		DISPOSAL SITE IMPROVEMENTS.	
17656	I.D. Signs.	An identification sign was present at the corner of 28th and "C" Streets. (See photo III-1-10).	C
17657	Entry Signs.	The landfill did not require entry signs, as it was not open to the public. The composting operation had the required entry signs. (See Photo III-1-8, III-1-9).	C

Inspector: [illegible]

CAC	SECTION	OBSERVATIONS	RESULT
17658	Site Security.	There were areas of fencing missing on the northern and western perimeters of the landfill which had allowed unauthorized access to the site, as evident by motorcycle tracks over fill areas. Equipment was broken into the night before my inspection as evidenced by broken windows on the day of my inspection. (See photo III-1-7, III-1-11, III-1-13). Note: A fence was being completed on the northwestern portion of the site.	V
17659	Access Roads.	Access roads were smooth and allowed good access to the site. Note: There was an accumulation of litter to the south of the railroad tracks east of 28th Street.	C
17660	Internal Roads.	Internal roads were signed, smooth, and allowed good access to the unloading areas. (See photo III-1-21).	C
		DISPOSAL SITE HEALTH AND SAFETY.	
17666	Sanitary Facilities.	Sanitary facilities were available on site and included showers, wash basins, and toilets.	C
17667	Water Supply.	Drinking water was supplied by Sierra Water Company and by the Sacramento City Water System.	C
17668	Communication Facilities.	There were telephone on site. Phone # 449-5221.	C
17669	Lighting.	Floodlights were used during the hours of darkness on the day of my inspection.	C

Inspector: [illegible]

CAC	SECTION	OBSERVATIONS	RESULT
17670	Personnel Health and Safety.	Safety equipment and supplies including ear-plugs, gloves, goggles, dust masks, seat belts and fire extinguishers were available to site personnel. The Local Enforcement Agency did not require that specific items be used.	C
		DISPOSAL SITE OPERATIONS.	
17676	Confined Unloading.	The unloading area was measured to be less than 50 yards by 50 yards by the rangefinder and was properly confined.	C
17677	Spreading and Compacting.	Waste was spread to the north of the working face and was compacted by repetitive passes by the dozer and compactor.	C
17678	Slopes and Cuts.	The slope of the working face was measured to be seven degrees or a ratio of 8.13:1 by the clinometer. This slope was such that effective compaction of waste was maintained.	C
17679	Final Site Face.	Final Site Face on the northwestern portion of the site had a neat and finished appearance and was measured to have a slope of 16 degrees or a ratio of 3:48:1 as measured by the clinometer.	C
17680	Stockpiling.	Stockpiling of cover material was located to the south of the active working area. Wastes were stockpiled for a brief period to the south of the working face. Stockpiles did not interfere with other site activities.	C
17681	Availability of Cover.	Cover material was imported. Currently approximately 220,000 cubic yards of cover material was on site. Additional clay material will be purchased in order to effectively close the site according to Mr. Chris Choate, Site Supervisor.	C

Inspector: [illegible]

CAC	SECTION	OBSERVATIONS	RESULT
17682	Cover.	Areas not defined as intermediate or final cover by Mr. Chris Choate, Site Supervisor, to the east of the current working face and in an area of the old landfill which was left prior to moving into the expansion area, showed exposed waste. See Photo (III-2-7, III-2-8, III-2-15). Note: Daily cover was applied on the day of my inspection.	C
17683	Performance Standards.	This was not a performance standard site.	N
17684	Intermediate Cover.	Intermediate areas identified by Mr. Chris Choate, Site Supervisor, did not show exposed waste and had at least 12 inches of cover on all surfaces. (See photo III-2-17).	C
17685	Final Cover.	An experimental area located in the central portion of the site had received final cover. The area was well graded and did not show exposed waste.	C
17686	Scavenging.	I did not observe any scavenging through the waste on the day of my inspection. Note: The scavenger mentioned in the initial two Presley reports was removed by the police on the morning of my inspection.	C
17687	Salvaging Permitted.	There were no salvaging operations on this site.	N
17688	Volume Reduction and Energy Recovery.	There was a composting operation on this site. It was conducted in a controlled manner and did not interfere with other site operations.	C
17689	Processing Area.	The composting area was located on the southwestern portion of the site and was separated from the rest of the landfill.	C

Inspector: [illegible]

CAC	SECTION	OBSERVATIONS	RESULT
17690	Storage of Salvage.	There were no salvaging operations on this site.	N
17691	Removal.	There were no salvaging operations on this site.	N
17692	Non-Salvageable Items.	I did not observe the salvage of any items considered non-salvageable by this Section.	C
		DISPOSAL SITE CONTROLS	
17701	Nuisance Control.	The operation did not cause a public nuisance. A nuisance "hotline" was available for the public to use to register complaints. There have not been any recent complaints according to Mr. Chris Choate, Site Supervisor.	C
17702	Animal Feeding.	I did not observe animals feeding on waste on the day of my inspection.	C
17703	Fire Control.	Fire breaks were present around the perimeter of the site. The fire department inspects the site yearly to make sure breaks are present and will do control burns if necessary. If a fire does break out the fire department is called and the fire is controlled by the water truck and earth moving equipment. I did not observe any fires or see evidence of recent fires.	C

Inspector: [illegible]

CAC	SECTION	OBSERVATIONS	RESULT
7704	Leachate Control.	I did not observe any leachate leaving the site. Tim Crandell of the Water Quality Control Board Central Valley Region (RWQCB-CVR) said during a phone conversation on 1/14/87 that the site had submitted a SWAT proposal since it was a Rank 1 Calderon Site. They had just finished installing there monitoring wells and will be doing split sampling. Tim Crandell said the site is currently in compliance with the Subchapter 15 requirements. Note: Vinyl Chlorides had been detected in previous monitoring's and according to Tim Crandell, this new set of monitoring data will better explain how far and in what direction the contamination is taking place. New wells were installed in the inactive portion of the landfill located beyond the shredding operation to the west of the site which will also be monitored. A telephone conversation on 2/17/1987 with Tim Crandell revealed data obtained by the RWQCB-CVR from the split sampling mentioned above. Bromomethane, Vinyl Chloride, Trichlorofluoromethane, and 1,1,1 Trichloroethane were found in concentrations of up to 16 Parts Per Billion (PPB), 43 PPB, 14 PPB, and 2 PPB respectively. The action level as set by the Department of Health Services for Vinyl Chloride is 2 PPB. Action levels for the other compounds were not exceeded. Since this site is complying with Sub-Chapter 15 and Calderon requirements it is currently in compliance with this section.	C

Inspector: [illegible]

CAC	SECTION	OBSERVATIONS	RESULT
17705	Gas Control.	I tested for landfill gas at the monitoring wells along the "A" Street railroad tracks. I did not detect any measurable gas. Note: Probe #1, Probe #9, and Probe #10 were filled with water. Probe #2 was not found. These probes did not hinder my evaluation of this section.	C
17706	Dust Control.	I did not observe dust levels that would cause a public nuisance. A water truck was actively controlling the site.	C
17707	Vector and Bird Control.	I did not observe vectors on site. The small number of birds observed were not likely to cause a hazard to aviation or a public nuisance.	C
17708	Drainage and Erosion Control.	One of the drains on the eastern side of the site was filled with mud and will not drain effectively. Part of the drainage channel on the northern portion of the landfill was not graded to allow water to drain effectively. See Photo (III-2-25, III-2-14, III-1-22, III-2-13) The levi separating the expansion area from the existing landfill area was eroding at different points. No waste was exposed. Note: Mr. Chris Choate, Site Supervisor, said that since drainage systems had been installed around the levi, they are not actively controlling the erosion, since the erosion had not been deteriorating and exposing waste.	V
17709	Contact with Water.	I did not observe waste to be in contact with water.	C

Inspector: [illegible]

CAC	SECTION	OBSERVATIONS	RESULT
17710	Grading of Fill Surfaces.	Grading in the central portion of the landfill did not allow for effective lateral runoff. Ponding was evident in several places. Mr. Chris Choate, Supervisor, said that the above area had been graded to allow for lateral runoff, but had been mismanaged by the company contracted for the final cover operation. See Photo (III-2-20, III-2-21).	V
17711	Litter Control.	I did not observe accumulations of litter which were likely to cause a public nuisance. A daily litter pick-up program was in effect and on-site litter was actively controlled.	C
17712	Noise Control.	Noise levels did not cause a public nuisance.	C
17713	Odor Control.	I did detect odors on-site but none were detected off site.	C
17714	Traffic Control.	Traffic flow did not cause a public safety hazard. I did not observe vehicles stacking onto public roads.	C
17715	Ponded Liquid.	This site did not have any ponded liquid.	C
		DISPOSAL SITE EQUIPMENT.	
17726	General.	Disposal site equipment included a compactor, two dozers, a scraper and a water truck. The number and type was consistent with the requirements listed in the Report of Disposal Site Information.	C
17727	Standby Equipment.	Standby equipment included a water truck, a dozer and a scraper which was available on-site.	C

Inspector: [illegible]

CAC	SECTION	OBSERVATIONS	RESULT
		DISPOSAL SITE MAINTENANCE.	
17731	General.	Site maintenance included daily checks by the Supervisor, Chris Choate. Equipment was inspected daily by the operators. Equipment and facility maintenance programs were effective.	C
17732	Operating Site Maintenance.	Since there were three maintenance related violations (Site Security - 17658, Drainage and Erosion Control - 17708 and Grading of Fill Surfaces - 17710), this site is in violation of Section 17732.	V
17733	Inspection on Completion.	The site has not closed.	N
17734	Completed Site Maintenance.	The site has not closed.	N
17735	Recording.	The site was recorded, as documented in the 1984 Report of Disposal Site Information.	C
		DISPOSAL SITE SPECIAL WASTES.	
17741	Burning Wastes.	I did not observe burning wastes on the day of my inspection. If burning wastes are received they are separated, spread with a dozer, doused with water and left until completely extinguished.	C
17742	Hazardous Wastes.	I did not observe hazardous wastes on the day of my inspection. The operators were trained to check for hazardous wastes. If found, they would be separated and the proper authorities would be notified.	C
17743	Liquid Wastes.	I did not observe liquid wastes on the day of my inspection.	C

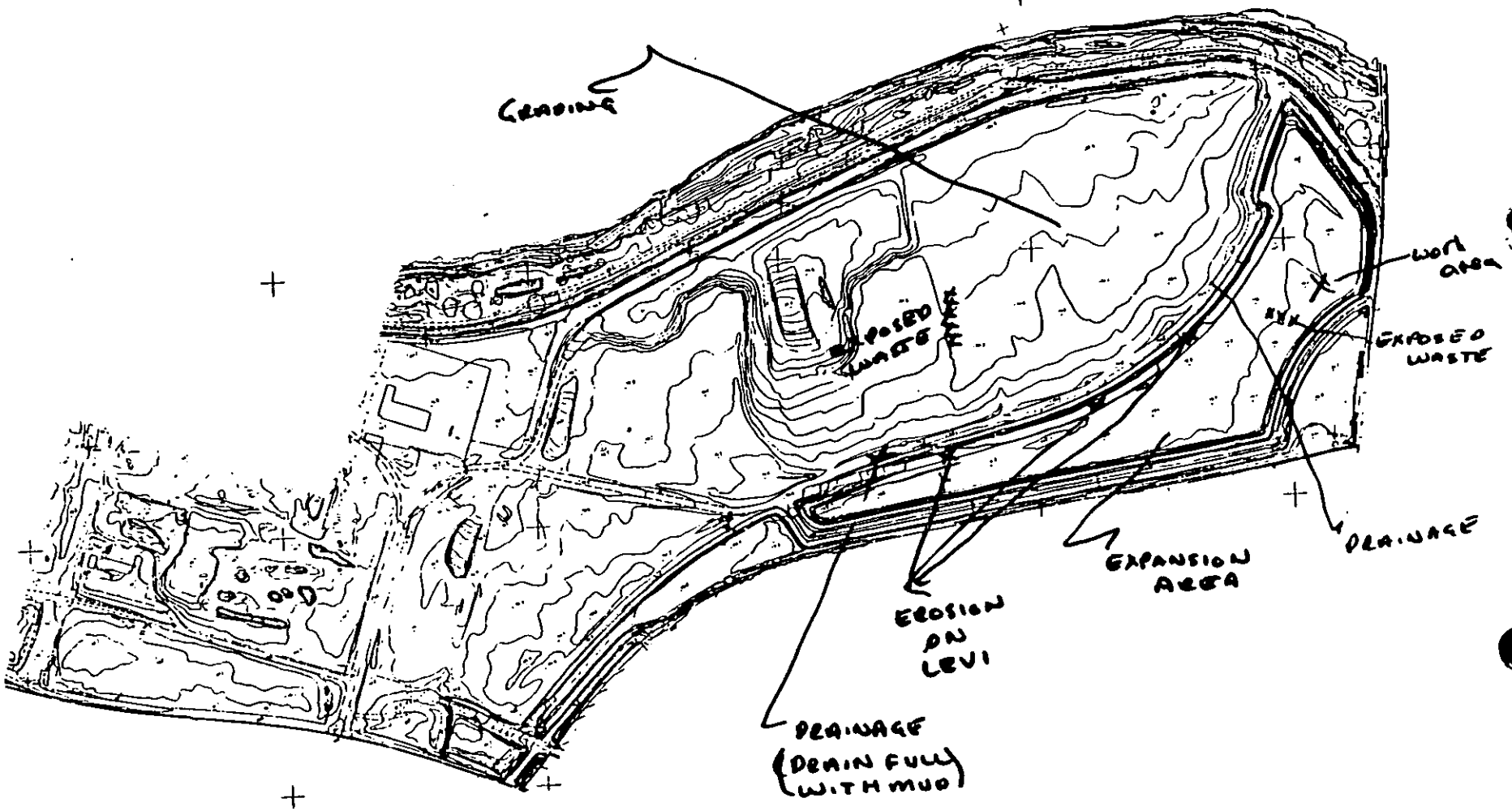
Inspector: [illegible]

CAC	SECTION	OBSERVATIONS	RESULT
17744	Dead Animals.	I did not observe dead animals on the day of my inspection.	C
		DISPOSAL SITE REPORTS AND REVIEWS.	
17751	Periodic Site Review.	The City of Sacramento Closure Plan for the 28th Street Sanitary Landfill was done in June 1986.	C

NOTES

I was accompanied by Susan O'Leary of the California Waste Management Board on the day of my inspection.

Inspector: [illegible]



EARTHWRIGHT AERIAL SURVEYS INC.

REVISIONS

BENCH MARK

CITY OF SACRAMENTO
DEPARTMENT OF PUBLIC WORKS

368

SWIS-00 (REV. 1/83)

NOTICE OF INSPECTION DISPOSAL SITE

LOCAL ENFORCEMENT AGENCY: SACRAMENTO COUNTY ENVIRONMENTAL HEALTH

FACILITY FILE [redacted] COUNTY	LEA	INSPECTION DATE (1011) MM DD YY	T-OUT / T-IN	TOTAL TIME (DECIMAL HOURS) (1031)
34	AO [redacted]	1/26/87		3

FACILITY NAME: SACRAMENTO CITY LANDFILL

FACILITY LOCATION:

INSPECTOR: NEIL SHERMAN

ALSO PRESENT: SUSAN O'LEARY

RECEIVED BY:
Operator _____
Owner _____

Comments: 17658 - Site Security - unauthorized access
17710 - Grading - did not account for lateral runoff
17682 - Exposed waste
17708 - Drainage - Blocked drain - grading of channels
17732 - 3 maintenance related violations as above

	*V	C
(3011) RECORDS		☒
☐ ACCURATE WEIGHT/VOLUME RECORDS MAINTAINED 17636		
☐ ADEQUATE SUBSURFACE RECORDS MAINTAINED 17637		
☐ LOG OF SPECIAL OCCURRENCES MAINTAINED 17638		
☐ RECORDS AVAILABLE FOR INSPECTION 17639		
(3021) PERSONNEL		☒
☐ ADEQUATE NUMBER OF QUALIFIED PERSONNEL AVAILABLE 17646		
☐ PERSONNEL ADEQUATELY TRAINED 17647		
☐ ADEQUATE SUPERVISION PROVIDED 17648		
☐ SITE ATTENDANT AVAILABLE FULL-TIME OR AS DETERMINED BY LEA 17649		
(3031) SIGNS		☒
☐ IDENTIFICATION SIGNS AT EACH POINT OF ACCESS 17656		
☐ ENTRY SIGN STATES FEES, HOURS OF OPERATION, WASTES ACCEPTED/NOT ACCEPTED 17657		
☐ NON-HAZARDOUS UNATTENDED SITES HAVE SIGN WARNING USERS OF UNAVAILABILITY OF COMMUNICATION FACILITIES 17659		
(3041) SECURITY	☒	
☐ ADEQUATE PERIMETER SECURITY, HAZARDOUS AREAS FENCED AND IDENTIFIED 17658		
(3051) ROADS		☒
☐ ACCESS ROADS HAVE SMOOTH SURFACE, MINIMIZE DUST AND TRACKING OF MUD, AND ALLOW ALL-WEATHER ACCESS 17689		
☐ INTERNAL ROADS IN SAFE CONDITION, PROVIDE ACCESS DURING INCLEMENT WEATHER, AND ARE PROVIDED WITH DIRECTIONS 17669		
(3071) SANITATION		☒
☐ ADEQUATE SANITARY FACILITIES AVAILABLE 17666		
☐ SAFE ADEQUATE DRINKING WATER AVAILABLE 17667		
(3081) COMMUNICATIONS		☒
☐ COMMUNICATION FACILITIES AVAILABLE WHERE HAZARDOUS WASTES ARE ACCEPTED 17669		
(3091) LIGHTING		☒
☐ LIGHTING ADEQUATE 17663		
(3101) SAFETY		☒
☐ SAFETY EQUIPMENT IN USE AND BEING WORN 17670		

	V	C
(3111) CONFINED UNLOADING		☒
☐ UNLOADING ADEQUATELY CONFINED 17675		
(3141) SPREADING/COMPACTING		☒
☐ SPREADING AND COMPACTION IN TWO-FOOT LAYERS 17677		
(3151) SLOPES/CUTS/GRADING	☒	
☐ WORKING FACE SLOPES ALLOW EFFECTIVE COMPACTION, DEPTH OF CUTS AND SLOPES OF TRENCH SIDES AS APPROVED BY LEA 17678		
☐ FINAL SLOPES HAVE NEAT APPEARANCE AND ARE 1-1/4 : 1 OR FLATTER 17679		
☒ GRADING OF FILL SURFACES ADEQUATE 17710		
(3161) COVER	☒	
☐ STOCKPILING OF COVER DOES NOT INTERFERE WITH OPERATIONS 17680		
☐ SUITABLE QUALITY AND SUPPLY OF COVER MATERIAL AVAILABLE 17681		
☒ COVER PROVIDED AT REQUIRED DEPTH AND FREQUENCY 17682		
☐ INTERMEDIATE COVER PROVIDED AT REQUIRED DEPTH AND FREQUENCY 17684		
☐ FINAL COVER PROVIDED AS REQUIRED 17683		
(3171) SALVAGING/PROCESSING		☒
☐ SCAVENGING PROHIBITED 17686		
☐ SALVAGING DOES NOT INTERFERE WITH OPERATIONS 17687		
☐ VOLUME REDUCTION AND ENERGY RECOVERY DO NOT INTERFERE WITH OPERATIONS OR CREATE HEALTH, SAFETY OR ENVIRONMENTAL PROBLEMS 17688		
☐ SALVAGING AND VOLUME REDUCTION CONFINED TO CLEARLY IDENTIFIED AREAS 17689		
☐ SALVAGE STORAGE LOCATION OK, VOLUME AS APPROVED BY LEA, MINIMIZES FIRE, NUISANCE 17690		
☐ SALVAGE STORAGE TIME DOES NOT RESULT IN HEALTH OR FIRE PROBLEMS 17691		
☐ SALVAGED MATERIALS APPROVED BY LEA AND LOCAL HEALTH 17692		
(3181) NUISANCE		☒
☐ OPERATIONS DO NOT CREATE A PUBLIC NUISANCE 17701		
☐ FEEDING OF REFUSE TO ANIMALS FOR HUMAN CONSUMPTION PROHIBITED 17[illegible]		

	V	C
(3191) FIRE		☒
☐ FIRE CONTROL ADEQUATE 17703		
(3192) FIRE (P)		
☐ BURNING MATERIALS SPREAD AND EXTINGUISHED, LEA, SWMB NOTIFIED IMMEDIATELY OF FIRE NOT EXTINGUISHED IN 24 HOURS 17693		
(3201) LEACHATE		☒
☐ ADEQUATE STEPS TAKEN TO MONITOR, COLLECT, TREAT, AND DISPOSE OF LEACHATES 17704		
☐ NO WASTES IN DIRECT CONTACT WITH WATER EXCEPT AS APPROVED BY RWQCB 17709		
(3202) LEACHATE (P)		
☐ REFUSE COVERED WITH NEXT DAY'S REFUSE OR WITH SIX INCHES OF COMPACTED SOIL. TOTAL AREA OF EXPOSED REFUSE IS AS SPECIFIED FOR WET AND DRY SEASONS 17693		
(3211) GAS		☒
☐ GAS MONITORING AND CONTROL AS REQUIRED 17705		
(3221) DUST		☒
☐ DUST CONTROL ADEQUATE 17706		
(3231) VECTORS/BIRDS		☒
☐ VECTOR AND BIRD CONTROL ADEQUATE 17707		
☐ LIQUID PONDS MINIMIZE VECTOR PROPAGATION 17713		
(3232) VECTORS (P)		
☐ THRESHOLD VALUES FOR VECTOR POPULATIONS NOT EXCEEDED 17693		
(3241) DRAINAGE/EROSION	☒	
☐ DRAINAGE AND EROSION CONTROL ADEQUATE 17708		
(3251) LITTER		☒
☐ LITTER CONTROL ADEQUATE 17711		
(3252) LITTER (P)		
☐ LITTER NOT ALLOWED TO MIGRATE OFF-SITE 17693		
(3261) NOISE		☒
☐ NOISE CONTROL ADEQUATE 17712		
(3271) ODOR		☒
☐ ODOR CONTROL ADEQUATE 17713		
(3272) ODOR (P)		
☐ AMBIENT AIR AT OR BEYOND FACILITY BOUNDARY IS NOT ODOROUS 17693		

	V	C
(3281) TRAFFIC		☒
☐ TRAFFIC CONTROL ADEQUATE WITHIN SITE. TRAFFIC MINIMIZES INTERFERENCE, SAFETY PROBLEMS, AND STACKING ON PUBLIC ROADS 17714		
(3291) EQUIPMENT		☒
☐ EQUIPMENT ADEQUATE IN TYPE, CAPACITY, AND NUMBER, AND IS ADEQUATELY MAINTAINED 17726		
☐ STANDBY EQUIPMENT AVAILABLE TO COMPLY WITH SEC. 17683 AND OTHER SECTIONS 17727		
(3301) MAINTENANCE	☒	
☐ EFFECTIVE MAINTENANCE PROCEDURES AND PROGRAMS DEVELOPED AND UTILIZED 17731		
☒ ADEQUATE MONITORING AND REPAIR OF DETERIORATED CONDITIONS 17732		
(3311) CLOSURE		☒
☐ AFTER CLOSURE, IF LEACHATE, EXTENSIVE SURFACE CRACKING OR SETTLEMENT OCCURS, THE OWNER SHALL NOTIFY LEA AND SHALL MONITOR AND REPAIR SITE FOR A PERIOD OF 5 YEARS OR LONGER 17734		
☐ UPON SITE CLOSURE, DETAILED DESCRIPTION MUST BE FILED WITH THE LEA AND WITH THE COUNTY RECORDER 17738		
(3321) SPECIAL WASTES		☒
☐ BURNING WASTES IMMEDIATELY SPREAD AND EXTINGUISHED IN SAFE AREA 17741		
☐ SITE ACCEPTS ONLY APPROVED HAZARDOUS WASTES AND TAKES PRECAUTIONS TO ELIMINATE OR CONTROL HARMFUL DUSTS, FUMES, MISTS, VAPORS, OR GASES 17742		
☐ LIQUID WASTES APPROVED BY RWQCB, LOCAL HEALTH ENTITY AND LEA 17743		
☐ DEAD ANIMALS ALLOWED BY LOCAL REGULATIONS 17744		
(3331) OTHER		
☐ _____		

*V = Violation
C = Compliance

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DISTRIBUTION: WHITE — CWMB YELLOW — OPERATOR PINK — LEA

CALIFORNIA WASTE MANAGEMENT BOARD
Agenda Item #11-E
March 26-27, 1987

Item:

Consideration of notifying the operator of the Santa Clara/Coastal Landfill (Ventura County) of the Board's intent to include that facility on the State List of Non-Complying Facilities pursuant to Government Code Section 66796.38.

Key Issues:

- Santa Clara/Coastal Landfill has been evaluated for compliance with State Minimum Standards including three on-site inspections by Board staff.

- Ongoing and/or repeated violations of the following Minimum Standards were documented:

  17616 - Report of Disposal Site Information (Ongoing)
  17682 - Daily Cover (Repeated)
  17705 - Gas Control (Ongoing)
  17710 - Grading of Fill Surfaces (Ongoing)

- Staff recommends that the Board authorize the Chief Executive Officer to notify the facility's owner of the Board's intent to add the facility to the State List of Non-Complying Facilities unless specific corrective measures are implemented within 90 days of notice.

Site Information:

Name:	Santa Clara/Coastal Landfill
SWIS #:	56-AA-0004
Facility Type:	Class III Sanitary Landfill (New Classification System)
Operational Status:	Open
Location:	4105 W. Gonzales Road, Oxnard (Ventura County)
Setting:	Agricultural/Residential
Permitted Tonnage:	1,500 Tons Per Day
In-Place Volume:	Approximately 5,300,000 tons
Permitted Acreage:	244 acres

Site Information (continued):

Facility Owner:	Ventura Regional County Sanitation District/City of Oxnard
Facility Operator:	Ventura Regional County Sanitation District
Local Enforcement Agency:	Ventura County Environmental Health

Summary of Repeat Presley Violations:

CAC Section	1st Inspec. 12/20/85	2nd Inspec. 7/25/86	3rd Inspec. 1/8/87
17616 - RDSI	Violation	Violation	Violation
17629 - Public Health Design	Comply	Comply	Indeter.
17682 - Cover	Violation	Comply	Violation
17684 - Intermediate Cover	Indeter.	Comply	Violation
17704 - Leachate Control	Indeter.	Indeter.	Indeter.
17705 - Gas Control	Indeter.	Comply	Violation
17708 - Drainage/ Erosion Control	Comply	Comply	Violation
17710 - Grading of Fill Surfaces	Violation	Comply	Violation

Background:

The Santa Clara/Coastal Landfill is a 244 acre Class III facility (new classification system) located in a residential/agricultural area on the south bank of the Santa Clara River in Oxnard, Ventura County. A golf course has been constructed on the Santa Clara section of the site while landfill operations continue on the Coastal section. Although each section now has a different owner and operator, the site is still operating under a single Solid Waste Facilities Permit. The history of site ownership, operations, and permit approval is very complex and only briefly summarized here.

The Santa Clara or east section of the site is owned by the City of Oxnard and was operated by the Ventura Regional County Sanitation District (VRCSD) until it ceased landfill operations in August, 1982. The River Ridge golf course was subsequently built on Santa Clara and is now operated by the City of Oxnard. The Raddison Hotel was recently built adjacent to the southeast perimeter of Santa Clara and a housing development is tentatively planned adjacent to the southwest perimeter. A 7,200 foot long, 25 foot deep methane gas migration barrier was recently constructed along the south perimeter of Santa Clara between the site and the hotel and proposed housing development. Pacific Lighting currently operates a methane gas collection and gas-to-electricity generating station on the Santa Clara section of the site.

The Coastal or west section of the site is owned and operated by VRCSD. It currently accepts a daily average of 1,800 tons of residential and commercial refuse. No hazardous or liquid wastes are accepted. Land within 1000 feet of the site perimeter is currently used for agriculture. However, a housing development is tentatively planned adjacent to the southeast site perimeter. Coastal is scheduled to cease operations in October, 1987. A methane gas collection and gas-to-electricity generating facility is planned for the Coastal section after closure.

The Santa Clara and Coastal sections of the site are now owned and operated by separate entities. When the City of Oxnard took over management of the Santa Clara portion and built the golf course, it became a new operator under CAC Section 66796.30(b). This regulation requires a new operator to immediately apply for a new Solid Waste Facilities Permit. Concurrently, the VRCSD was obligated to apply for a revised permit under CAC Section 66796.30(e) to continue operations at the Coastal section of the site. These legalities were made known to the parties involved by the Ventura County Counsel on January 13, 1984.

To date, both sections of the site are still being operated under the original Santa Clara permit. A closure plan was prepared for the Santa Clara section in 1982 but was never approved by the LEA. A closure plan for the Coastal section was submitted to the LEA by the VRCSD in January, 1986. However, the LEA rejected the Coastal plan because it failed to address both the Coastal and Santa Clara sections of the site. The LEA currently expects a comprehensive closure plan from the VRCSD in April, 1987. On the other hand, the VRCSD feels that the 1982 closure plan for the Santa Clara section was adequate even though the LEA never approved it. Therefore, the VRCSD does not intend to address the Santa Clara section in the closure plan being submitted in April.

Three years have passed since the Ventura County Counsel first notified involved parties that new permits were required for each section of the site. The LEA does not currently plan to require the VRCSD or the City of Oxnard to submit applications for proper Solid Waste Facilities Permits until after it approves a comprehensive site closure plan. Considering the above controversy over closure plans, it is uncertain when the permitting process will be completed.

Past Compliance:

The first CWMB on-site inspection of Santa Clara/Coastal was conducted on 12/17/85. During the year prior to this inspection, the Local Enforcement Agency (LEA) reported the results of 5 on-site inspections to the State Solid Waste Information System (SWIS). The following 5 violations of State Minimum Standards were documented during these inspections:

CAC Section	Number of Violations
17682 - Daily Cover	2
17707 - Vector/Bird Control	2
17711 - Litter Control	1
TOTAL	5

Prior to the first CWMB inspection, the LEA, Los Angeles Regional Water Quality Control Board (L.A.RWQCB), Ventura County Air Pollution Control District (APCD), and the Oxnard Fire Department were contacted regarding the compliance history of the site. No agency had any records of complaints or violations that would indicate noncompliance with any additional State Minimum Standards. However, a review of CWMB files showed that the LEA notified the facility operator on April 23, 1985 that a comprehensive methane gas monitoring program was required around the perimeter of the Coastal section of the site.

Recent Compliance:

Between 12/20/85 and 1/8/87, CWMB staff evaluated compliance of the Santa Clara/Coastal Landfill with State Minimum Standards. The results of three on-site inspections are presented in the chronology below and in attachments #1, #3, and #5. During the CWMB evaluation period, the LEA reported the results of 6 on-site inspections to SWIS and reported the following 15 violations of Minimum Standards:

CAC Section	# of Violations
17682 - Daily Cover	1
17701 - Nuisance Control	1
17706 - Dust Control	2
17707 - Vector/Bird Control	1
17708 - Drainage/Erosion Control	6
17726 - General/Equipment	1
17741+44 - Special Wastes	3
TOTAL	15

Contacts with the L.A. RWQCB, the LEA, and the Ventura County APCD, prior to the third CWMB inspection revealed the following issues:

1. Carole Kawamoto of the L.A. RWQCB stated in a telephone conversation on 1/6/87 that a preliminary review of groundwater quality monitoring reports from December, 1985 to December, 1986 indicated a decline in groundwater quality under the Santa Clara section. Ms. Kawamoto indicated that this problem was probably due to landfill gas being in contact with groundwater under the site. She also stated that excessive watering of the golf course now operated on the site was probably a factor contributing to the problem.*

   *Note: Moisture added to landfilled waste can increase the rate of methane gas production. It can also contribute to leachate production.

2. The L.A. RWQCB is concerned that surface drainage from the golf course may be contaminated with leachate.

3. The L.A. RWQCB and LEA are concerned that the levee along the north perimeter of the Santa Clara section is inadequate to withstand a 100 year flood as required by Subchapter 15 regulations for existing landfills.

4. Pacific Lighting, who currently operates a methane gas collection and gas-to-electricity generating station on Santa Clara, is disposing methane gas condensates back into the landfill. The L.A. RWQCB considered issuing a cleanup and abatement order on 1/22/87 but postponed a decision until April, 1987.

5. Neil Moyer of the Ventura County APCD stated in a telephone conversation on 1/7/87 that both the Santa Clara and Coastal sections of the landfill probably exceed limits for emissions of methane gas to air as established by the South Coast Air Quality Management District. However, testing to confirm this supposition will not be conducted until mid 1987.

A chronology of events occurring during the CWMB evaluation period is presented below.

December 20, 1985

The first of three inspections by CWMB staff was conducted by Richard Hill. The following violations of CAC sections were documented:

17616 - Report of Disposal Site Information
17638 - Log of Special Occurrences
17682 - Daily Cover
17710 - Grading of Fill Surfaces
17742 - Hazardous Wastes
17751 - Periodic Site Review

Site compliance with CAC Sections 17684 (Intermediate Cover), 17704 (Leachate Control), and 17705 (Gas Control) was given an indeterminate status pending further investigation. The facility was found in compliance with all other applicable standards.

January 9, 1986

A draft closure plan for the Coastal section was submitted to the LEA by the VRCSD.

January 17, 1986

The LEA notified VRCSD for the third time that a comprehensive methane gas monitoring program was needed along the west, south, and east perimeters of the Coastal section (the first and second notification were on 4/23/85 and 9/23/85 respectively).

January 22, 1986

The LEA notified the VRCSD that samples of landfill gas collected from the Santa Clara section indicated the presence of vinyl chloride.

February 2, 1986

CWMB staff comments concerning the Coastal Draft Closure Plan were transmitted to the LEA and VRCSD. The following pertinent points were made:

1. "Strongly suggested" that drainage channels (levees) along the Santa Clara River be constructed to withstand 100 year flood events.

2. Proposed minimum slopes of 2.5% do not meet Subchapter 15 requirements of 3.0%.

3. For permit purposes, it was pointed out that ultimate responsibility for the site needed to be resolved between the VRCSD (operator) and Ventura Coastal Corp (owner).

4. It was noted that CWMB staff understood that permits would be applied for and issued in advance of actual closure.

February 10, 1986

The LEA notified the VRCSD, that the Coastal Draft Closure Plan was inadequate for the following reasons:

1. The plan did not address both the Santa Clara and Coastal sections of the site which are part of the same permit. The closure plan must include both sections of the site to be complete.

2. Plans for construction of a 5,000 gallon below grade methane gas condensate collection sump must receive approval from the Hazardous Materials Section of the Ventura Co. Health Dept.

3. Both an active methane gas migration control barrier and passive gas collection system must be installed.

March 20, 1986

Mandeville and Associates reported the results of off-site methane gas testing adjacent to the south and east perimeters of the Coastal section. The results indicate that a potential methane gas migration problem exists in these areas.

March 25, 1986

The LEA notified the City of Oxnard (owner of Santa Clara portion of site) that the levee protecting the landfill from the Santa Clara River had been judged inadequate to withstand a 100 year flood by the Ventura County Flood Control Dept.

April 4, 1986

CWMB staff person Richard Hill requested a copy of the Revised Solid Waste Facilities Permit (6/20/79) and Board Notice of Concurrence from the LEA.

April 8, 1986

CWMB staff received a copy of the Revised Solid Waste Facility Permit of 6/20/79 from the LEA. However, the letter of CWMB concurrence sent with the revised permit was dated 8/11/78 and

was for the original not the revised permit.

Note: A review of CWMB files indicates that the Board may have not concurred with the permit revision.

April 16, 1986

VRCSD notified the LEA that it planned to install a comprehensive methane gas monitoring system around the Coastal perimeter when the Coastal Draft Closure Plan is approved. Because there are no structures within 1,000 feet of the coastal perimeter, VRCSD did not feel that gas migration documented on March 20, 1986 was an imminent threat to the public.

May 8, 1986

The results of the first CWMB inspection were transmitted to the VRCSD and LEA (attachment #1). The cover letter advised the operator of the nature of the CWMB evaluation program and the consequences of noncompliance.

May 15, 1986

The LEA notified VRCSD that ponding problems in the perimeter drains at the Coastal section must be corrected.

May 22, 1986

VRCSD notified CWMB staff by phone that it disagreed with violations given on the first CWMB inspection of 12/20/85 for CAC Sections 17638 (Log of Special Occurrences) and 17724 (Hazardous Wastes). VRCSD said it would send a written statement outlining its views. No letter was found in CWMB files.

May 28, 1986

LEA notified the L.A. RWQCB that the levee protecting the Santa Clara section from the Santa Clara River was substandard with relation to Subchapter 15 requirements.

May 29, 1986

VRCSD notified the LEA that it did not believe the perimeter drainage problem at Coastal was very serious and intended to put off repairs until after the closure plan was accepted.

June 5, 1986

LEA instructed VRCSD to immediately fix the perimeter drain at Coastal.

June 13, 1986

VRCSD submitted an interim drainage plan for Coastal to the LEA.

July 9, 1986

LEA reinspected Coastal perimeter drain and still found a problem with ponding.

July 14, 1986

The LEA notified the L.A. RWQCB of the perimeter drainage problem at the Coastal Site.

July 15, 1986

The LEA notified VRCSD that methane gas migration from the Coastal site may be a potential threat to the adjacent agricultural environment. Reminded VRCSD that Coastal needs a comprehensive perimeter gas migration monitoring program.

July 24, 1986

VRCSD notified the LEA that it did not believe the agricultural environment was being negatively affected by methane gas. VRCSD stated that a perimeter gas monitoring and control system would not be constructed until the site is closed.

July 25, 1987

The second of three CWMB staff inspections was conducted by Pam Badger. The following violations of CAC sections were documented:

17616 - Report of Disposal Site Information
17706 - Dust Control
17707 - Vector/Bird Control
17751 - Periodic Site Review

Site compliance with CAC Section 17704 (Leachate Control) was given an indeterminate status pending further investigation. The site was found in compliance with all other applicable standards.

July 29, 1986

CWMB staff received methane gas and leachate monitoring reports from VRCSD requested by Pam Badger during her inspection on 7/25/86. No interpretation of the results had been made. However, gas monitoring results indicated high concentrations of methane gas along the south perimeter of the Santa Clara section.

August 5, 1986

CWMB staff received a letter from VRCSD concerning Pam Badger's inspection of 7/25/86 (attachment #2). VRCSD outlined its plans to bring the site in compliance with CAC Sections 17706 (Dust Control) and 17707 (Vector/Bird Control).

August 8, 1986

Results of the second CWMB inspection were transmitted to VRCSD and the LEA (attachment #3). The cover letter advises the operator of the nature of the CWMB evaluation program and the consequences of noncompliance.

August 8, 1986

VRCSD notified the L.A. RWQCB that the LEA misrepresented the seriousness of the drainage control problem at Coastal. VRCSD requested the L.A. RWQCB to make its own on-site inspection of Coastal perimeter drains.

August 19, 1986

LEA again notified L.A. RWQCB that Santa Clara levee was substandard with regard to Subchapter 15 requirements and inquired as to what enforcement action the Board was going to take.

August 27, 1986

CWMB staff received a letter from the LEA acknowledging receipt of the second CWMB inspection report sent on 8/8/86 (attachment 4). The LEA states that it would ensure that noted violations were corrected and would continue to inspect the site on a monthly basis.

October 9, 1986

LEA notified VRCSD that damaged and inundated gas migration monitoring probes at the Santa Clara section of the fill must be repaired.

January 8, 1987

The third of three CWMB staff inspections was conducted by Jack Miller. The following violations of CAC Sections were documented:

17616 - Report of Disposal Site Information
17682 - Daily Cover
17684 - Intermediate Cover
17705 - Gas Control
17708 - Drainage and Erosion Control
17710 - Grading of Fill Surfaces

Site Compliance with CAC Sections 17629 (Public Health Design Parameters) and 17704 (Leachate Control) was given an indeterminate status pending a determination by the L.A. RWQCB regarding the adequacy of the Santa Clara levee and potential surface and groundwater quality problems. The site was found in compliance with all other applicable standards. Mr. Miller noted that the perimeter drains at Coastal were being repaired.

January 19, 1987

VRCSD notified LEA that the City of Oxnard was in the process of fixing the inoperative gas monitoring probes at Santa Clara as requested by the LEA on October 9, 1986.

January 26, 1987

L.A. RWQCB considered issuing a Cleanup and Abatement order to Pacific Lighting regarding the disposal of landfill gas condensate at the Santa Clara Landfill. A decision to accept staff's recommendation to issue the order was postponed until the Board's April meeting.

January 27, 1987

LEA notified the City of Oxnard that it was satisfied with the construction of the gas migration barrier slurry wall but that the operator had yet to met all the conditions necessary for the LEA to give final approval.

February 2, 1987

LEA notified VRCSD that during an inspection on January 22, 1987, it noted violations of the following State Minimum Standards that

must be corrected prior to the next LEA inspection:

17682 - Daily Cover
17707 - Vector and Bird Control
17708 - Drainage and Erosion Control
17710 - Grading of Fill Surfaces
17711 - Litter Control

February 13, 1987

L.A. RWQCB notified the VRCSD that agricultural wastes with more than 50 percent moisture content were not permitted at the site.

February 17, 1987

L.A. RWQCB notified the VRCSD of the following problems noted at the Santa Clara section of the fill during a staff inspection on 1/8/87:

1. Inadequate drainage and on-site ponding.
2. Apparent over irrigation of the golf course.
3. Inadequate side slope drains and foamy liquid backed up in one side drain.

Based on these observations the L.A. RWQCB requested that the VRCSD test the stagnant water for priority pollutants and submit an operations and maintenance plan for the golf course irrigation system by March 20, 1987.

February 17, 1987

L.A. RWQCB formally requested the CWMB Board to take action regarding methane gas migration and control problems at the Santa Clara section of the landfill. Particular reference was made to possible groundwater degradation problems believed to be caused by landfill gas being in contact with groundwater.

February 18, 1987

L.A. RWQCB requested the City of Oxnard Public Works Department to evaluate the susceptibility of the Santa Clara Landfill to flood damage and to determine by March 18, 1987 the return period of full levee storm flow.

February 20, 1987

Results of the third CWMB inspection were transmitted to the VRCSD and the LEA (attachment #5). The cover letter again outlined the CWMB evaluation program. It also informed the

operator and LEA of staff's intent to ask the Board to establish a compliance schedule for the site at the Board's March Meeting.

Summary:

The Santa Clara/Coastal Landfill has been evaluated by CWMB staff for compliance with State Minimum Standards. All pertinent information including data gathered during three staff inspections conducted since December 17, 1985 has been reviewed.

17616 - Report of Disposal Site Information; Permits

The Santa Clara and Coastal sections of the site are owned and operated by separate entities. When the City of Oxnard took over management of the Santa Clara portion and built the golf course, it became a new operator under CAC Section 66796.30(b). This regulation requires a new operator to immediately apply for a new Solid Waste Facilities Permit. Concurrently, the VRCSD was obligated to apply for a revised permit under CAC Section 66796.30(e) to continue operations at the Coastal section of the site. These legalities were made known to the parties involved by the Ventura County Counsel on January 13, 1984.

To date, both sections of the site are still being operated under the original Santa Clara permit. A closure plan was prepared for the Santa Clara section in 1982 but was never approved by the LEA. A closure plan for the Coastal section was submitted to the LEA by the VRCSD in January, 1986. However, the LEA rejected the Coastal plan because it failed to address both the Coastal and Santa Clara sections of the site. The LEA currently expects a comprehensive closure plan from the VRCSD in April, 1987. On the other hand, the VRCSD feels that the 1982 closure plan for the Santa Clara section was adequate even though the LEA never approved it. Therefore, the VRCSD does not intend to address the Santa Clara section in the closure plan being submitted in April.

Three years have passed since the Ventura County Counsel first notified involved parties that new permits were required for each section of the site. The LEA does not currently plan to require the VRCSD or the City of Oxnard to submit applications for proper Solid Waste Facilities Permits until after it approves a comprehensive site closure plan. Considering the above controversy over closure plans, it is uncertain when the permitting process will be completed.

17682 - Cover

The site has received five daily cover violations during 14 LEA and CWMB inspections over the past two years. These figures indicate that the site working area has been inadequately covered

at least one third of the time. On January 22, 1987, the site was again found in violation of daily cover requirements by the LEA.

17705 - Gas Control

There is concern regarding landfill gas monitoring and control at the facility. The L.A. RWQCB is suspects that groundwater quality beneath the Santa Clara section is being diminished through direct contact with landfill gas. Excessive watering of the golf course now overlaying Santa Clara may be related to this problem. This is because moisture added to landfilled waste can dramatically increase landfill gas production.

Testing along the Coastal perimeter indicates a potential landfill gas migration problem. The LEA has notified the operators at least four times in the past 22 months that a comprehensive perimeter monitoring system must be installed. The operator plans to install a monitoring system in the near future but has yet to begin construction.

Operators of the Santa Clara portion of the site have recently constructed a 7,200 foot long methane gas migration barrier to protect developments encroaching on the site's south perimeter. However, the viability of this barrier system has yet to be tested and has yet to receive final approval from the LEA.

A gas collection and gas-to-electricity generating system has been installed at the Santa Clara portion of the site and one is planned for Coastal. Even so, the Ventura APCD is concerned that methane gas-to-air discharges from the surface of both sections may be excessive. If approved, a plan to add another gas-to-electricity generator to the existing system at Santa Clara may alleviate gas control problems at the site.

17704 - Leachate Control

There is a concern that surface drainage from the golf course may be contaminated with leachate. The on-site disposal of methane gas condensate is another unresolved issue which may affect leachate control.

17710 - Grading of Fill Surfaces

At both the Santa Clara and Coastal sections of the site, fill surfaces have not been graded to promote the lateral runoff of precipitation. Wet weather ponding has been a significant problem at both areas. Ponding may be contributing to landfill gas control problems, particularly on the golf course. Ponding may also lead to the production of leachate.

In addition to ponding, problems also exist with the surface drainage system at the golf course on Santa Clara. Marshy areas were observed at the heads of numerous surface drains indicating ineffective drainage. Ponded water was also observed in the main drain servicing the southeast corner of the golf course.

17629 - Public Health Design Parameters

The CWMB staff, LEA, and L.A. RWQCB have expressed concern that the levee along the north perimeter of the Santa Clara section is inadequate to withstand a 100 year flood event on the adjacent Santa Clara River.

Board Options:

Option #1

Notify the operator of the Board's intent to place the Santa Clara/Coastal Landfill on the State List of Non-Complying Facilities unless the following specified actions are taken within 90 days of notice.

Specified Actions:

17616 - Report of Disposal Site Information; Permits

* 1. In concurrence with the LEA and Board staff, establish specific dates by which closure plans for both sections of the site will be finalized and permit applications submitted. In no case shall this process exceed 6 months from the date of notice.

17682 - Cover

1. Submit a work plan designed to ensure that daily cover requirements are met.

   In addition, the Board requests the LEA to make bi-weekly inspections of the site to ensure that the operators are complying with cover requirements.

17705 - Gas Control

1. Install monitoring probes and initiate a monitoring program to document the viability of the gas migration barrier recently constructed along the south perimeter of Santa Clara. The monitoring system design, installation, and operation must meet all criteria

established by the LEA and be concurred with by Board staff.

2. Install monitoring probes and initiate a landfill gas monitoring program for the east, south, and west perimeter of Coastal. The monitoring system design, installation, and operation must meet all criteria established by the LEA and be concurred with by Board staff.

3. Install and maintain a system of ground tensiometers at Santa Clara designed to help mitigate watering problems on the golf course. Records of tensiometer readings, monitoring data, and amounts of water applied to the golf course must be submitted to the LEA and Board on a monthly basis.

4. Continue to cooperate with the L.A. RWQCB and Ventura County APCD and take all steps as directed to solve pollution problems attributed to landfill gas.

17704 - Leachate Control

1. Test surface drainage at the golf course on Santa Clara for priority pollutants. Runoff is to be tested from at least 4 of the stained "t" drains in addition to drainage from the culvert leaving the site under the Raddison Hotel complex.

2. Continue to cooperate with the L.A. RWQCB and take all steps as directed to mitigate any identified surface or groundwater contamination problems.

17710 - Grading of Fill Surfaces

1. Grade and maintain all Coastal fill surfaces with a 3% slope.

2. Construct temporary drainage structures as necessary to divert runoff from draining into the working area at the Coastal section.

* 3. Submit a work plan specifying dates for initiating and completing grading and drainage system improvements designed to alleviate ponding and drainage problems at the golf course.

17629 - Public Health Design Parameters

1. Implement all measures prescribed by the L.A. RWQCB and the LEA to correct any inadequacies identified with the levee along the north perimeter of the Santa Clara section.

* Board staff realizes that 90 days may be insufficient time to complete Specified Actions marked with an asterisk For these items, the operator must submit a compliance schedule for LEA and Board approval within 30 days. Failure to meet any deadline contained in the agreed upon compliance schedule will result in a recommendation by staff that the Board place the site on the State List of Non-Complying Facilities. In no case will such a recommendation be made in less than 90 days. Verification of all deadlines will be made through additional staff inspections as necessary.

Option #2

Direct the operator to establish a schedule for bringing the site into compliance with State Minimum Standards.

Under this option, the operator must submit a compliance schedule to the Board within 30 days stating specific dates for initiating and completing the required actions outlined in Option #1 above. If an agreeable schedule is not received by the Board within 30 days, and/or if dates specified for implementing and completing the required actions are not met, this option authorizes the Chief Executive Officer to issue a 90-day notice of the Board's intent to place the site on the State List of Non-Complying Facilities.

Option #3

No Action.

Notification:

The site operator and LEA have been invited to present any information relevant to the matter under consideration to the Board at its March meeting.

Recommendation:

Based on the information available to staff at the time of the report, staff recommends that the Board implement Option #1.

Santa Clara/Coastal

Attachments

#1 1st CWMB Inspection Report, May 8, 1986.

#2 Operator response to 1st CWMB Inspection, August 5, 1986.

#3 2nd CWMB Inspection Report, August 8, 1986.

#4 LEA response to 2nd CWMB Inspection Report, August 27, 1986.

#5 3rd CWMB Inspection Report, February 20, 1987.

Inv. Lt. + LP

STATE OF CALIFORNIA

CALIFORNIA WASTE MANAGEMENT BOARD
1020 NINTH STREET, SUITE 300
SACRAMENTO, CA 95814

1ST INSPECTION 12/20/85
Sent 5/8/86

5/8/86

To: Wayne Bruce, Manager
Ventura Regional Sanitation District
10001 Partridge, Suite 150
Ventura, CA 93003

Subject: Report of inspection: Santa Clara/Coastal Sanitary Landfill
56-AA-004

Government Code Section 66796.38 requires the California Waste Management Board (Board) to conduct inspections of solid waste facilities for the purpose of evaluating compliance with the State Standards for Solid Waste Handling and Disposal (Title 14. California Administrative Code, Division 7 Chapter 3, commencing with section 17200). Under this program, each facility will be inspected at least three separate times. As you are aware by now, staff has already conducted one of these inspections at the subject facility. The date of that inspection was December 20, 1985. A report resulting from the recent inspection is enclosed. If photographs are referred to in the inspection report, copies will be obtainable upon written request.

The goal of our inspection program is to verify compliance with each of the State Minimum Standards, not merely to find violation(s) of these standards. In order to achieve this we will, as I stated above, be inspecting each facility at least three times. This will provide the following advantages over the previous inspection techniques:

* The program will provide greater fairness to operators of facilities by reducing the possibility that one operator will be inspected under adverse conditions and another under favorable conditions.

* The program will allow for evaluation of conditions, which show seasonal variations such as effectiveness of leachate control systems, vectors, dust, etc.

* The program will provide a track record of compliance which will be used in evaluating standards for which a single violation may not be sufficient reason to place the facility on the State List of Non-Complying Facilities when the facility is generally in compliance with that standard, i.e., the daily cover standard.

SANTA CLARA / COASTAL
ATTACHMENT # 1

Although we do not intend to provide advance notice of the inspection dates to operators, the Local Enforcement Agency (LEA) will be notified of those dates, and will be invited to accompany our staff on the inspection.

If, after three inspections, your facility continues to be operating in violation of one or more of the State Minimum Standards you will be notified of this finding by certified letter. A copy of that letter will be sent to the LEA. After 90 days or upon notification of correction of all violations(s), Board staff will reinspect the facility. If the facility is still in violation, staff will notify you and the LEA, by certified letter of staff's intent to recommend that the Board place the facility's name on the State List of Non-Complying Facilities at a regularly scheduled meeting of the Board. Should the Board place the facility on that list, State law (Government Code 66796.39) requires that the LEA develop a compliance schedule for correction of the violation(s). If compliance is not achieved within one year, Government Code section 66796.39 directs LEAs to revoke facility operating permits. If the facility is closed or abandoned, staff will recommend that the LEA issue a notice of violation and an order to correct the violations. That Notice and Order will also notify you or the owner of the facility that State law provides that "the unremedied condition of the facility is prima facie evidence of negligence, and in any action for damages against the owner of the property for injury caused by the unremedied condition, the burden of proving the injury was not caused by an unremedied condition shall be on the owner of the property".

If you have any questions regarding the program, please contact me at (916) 322-6172.

Sincerely,

John K. Bell

John K. Bell, Manager
Monitoring Section

cc: Don Koepp, Ventura County Environmental Health

mea

SWIS-09 (REV. 1/85)

NOTICE OF INSPECTION
DISPOSAL SITE

LOCAL ENFORCEMENT AGENCY: Ventura County Environ. Health

FACILITY FILE NUMBER (COUNTY LEA NUMBER)	PROGRAM CODE	INSPECTION DATE (MM DD YY)	T-OUT / T-IN	TOTAL TIME (DECIMAL HOURS)
56 - AA - 004	P	(1011) 12-20-85		(1031) 9.0

FACILITY NAME: SANTA CLARA/Coastal S.L.

FACILITY LOCATION:

INSPECTOR: R. Hill

ALSO PRESENT: MARK BAILEY,

RECEIVED BY:
Operator
Owner

Comments: 17616 - The RDSI does not describe current operations and conditions.
17751 - The 5-yr review was not completed.

See Also: Monitoring Inspection Report of the same date.

	* V	C
(3011) RECORDS		☒
☐ ACCURATE WEIGHT/VOLUME RECORDS MAINTAINED 17636		
☐ ADEQUATE SUBSURFACE RECORDS MAINTAINED 17637		
☒ LOG OF SPECIAL OCCURRENCES MAINTAINED 17638	V	
RECORDS AVAILABLE FOR INSPECTION 17639		
(3021) PERSONNEL		
☐ ADEQUATE NUMBER OF QUALIFIED PERSONNEL AVAILABLE 17646		
☒ PERSONNEL ADEQUATELY TRAINED 17647	I	
☐ ADEQUATE SUPERVISION PROVIDED 17648		
☐ SITE ATTENDANT AVAILABLE FULL-TIME OR AS DETERMINED BY LEA 17649		
(3031) SIGNS		☒
☐ IDENTIFICATION SIGNS AT EACH POINT OF ACCESS 17656		
☐ ENTRY SIGN STATES FEES, HOURS OF OPERATION, WASTES ACCEPTED/NOT ACCEPTED 17657		
☐ NON-HAZARDOUS UNATTENDED SITES HAVE SIGN WARNING USERS OF UNAVAILABILITY OF COMMUNICATION FACILITIES 17658		
(3041) SECURITY		☒
☐ ADEQUATE PERIMETER SECURITY, HAZARDOUS AREAS FENCED AND IDENTIFIED 17659		
(3051) ROADS		☒
☐ ACCESS ROADS HAVE SMOOTH SURFACE, MINIMIZE DUST AND TRACKING OF MUD, AND ALLOW ALL-WEATHER ACCESS 17660		
☐ INTERNAL ROADS IN SAFE CONDITION, PROVIDE ACCESS DURING INCLEMENT WEATHER, AND ARE PROVIDED WITH DIRECTIONS 17663		
(3071) SANITATION		☒
☐ ADEQUATE SANITARY FACILITIES AVAILABLE 17666		
☐ SAFE ADEQUATE DRINKING WATER AVAILABLE 17667		
(3081) COMMUNICATIONS		☒
☐ COMMUNICATION FACILITIES AVAILABLE WHERE HAZARDOUS WASTES ARE ACCEPTED 17668		
(3091) LIGHTING		☒
☐ LIGHTING ADEQUATE 17669		
(3101) SAFETY		☒
☐ SAFETY EQUIPMENT IN USE AND BEING WORN 17670		

	V	C
(3111) CONFINED UNLOADING		☒
☐ UNLOADING ADEQUATELY CONFINED 17676		
(3141) SPREADING/COMPACTING		☒
☐ SPREADING AND COMPACTION IN TWO-FOOT LAYERS 17677		
(3151) SLOPES/CUTS/GRADING		☒
☐ WORKING FACE SLOPES ALLOW EFFECTIVE COMPACTION. DEPTH OF CUTS AND SLOPES OF TRENCH SIDES AS APPROVED BY LEA 17678		
☒ FINAL SLOPES HAVE NEAT APPEARANCE AND ARE 1-3/4 : 1 OR FLATTER 17679	I	
☒ GRADING OF FILL SURFACES ADEQUATE 17710	V	
(3161) COVER		☒
☐ STOCKPILING OF COVER DOES NOT INTERFERE WITH OPERATIONS 17680		
☐ SUITABLE QUALITY AND SUPPLY OF COVER MATERIAL AVAILABLE 17681		
☐ COVER PROVIDED AT REQUIRED DEPTH AND FREQUENCY 17682	V	
☒ INTERMEDIATE COVER PROVIDED AT REQUIRED DEPTH AND FREQUENCY 17684	I	
☐ FINAL COVER PROVIDED AS REQUIRED 17685		
(3171) SALVAGING/PROCESSING		☒
☐ SCAVENGING PROHIBITED 17686		
☐ SALVAGING DOES NOT INTERFERE WITH OPERATIONS 17687		
☐ VOLUME REDUCTION AND ENERGY RECOVERY DO NOT INTERFERE WITH OPERATIONS OR CREATE HEALTH, SAFETY OR ENVIRONMENTAL PROBLEMS 17688		
☐ SALVAGING AND VOLUME REDUCTION CONFINED TO CLEARLY IDENTIFIED AREAS 17689		
☐ SALVAGE STORAGE LOCATION OR, VOLUME AS APPROVED BY LEA, MINIMIZES FIRE, NUISANCE 17690		
☐ SALVAGE STORAGE TIME DOES NOT RESULT IN HEALTH OR FIRE PROBLEMS 17691		
☐ SALVAGED MATERIALS APPROVED BY LEA AND LOCAL HEALTH 17692		
(3181) NUISANCE		☒
☐ OPERATIONS DO NOT CREATE A PUBLIC NUISANCE 17701		
☐ FEEDING OF REFUSE TO ANIMALS FOR HUMAN CONSUMPTION PROHIBITED 17702		

	V	C
(3191) FIRE		☒
☐ FIRE CONTROL ADEQUATE 17703		
(3192) FIRE (P)		
☐ BURNING MATERIALS SPREAD AND EXTINGUISHED. LEA, SWMB NOTIFIED IMMEDIATELY OF FIRE NOT EXTINGUISHED IN 24 HOURS 17681	N/A	
(3201) LEACHATE		
☒ ADEQUATE STEPS TAKEN TO MONITOR, COLLECT, TREAT, AND DISPOSE OF LEACHATES 17704	I	
☐ NO WASTES IN DIRECT CONTACT WITH WATER EXCEPT AS APPROVED BY RWQCB 17709		
(3202) LEACHATE (P)		
☐ REFUSE COVERED WITH NEXT DAY'S REFUSE OR WITH SIX INCHES OF COMPACTED SOIL. TOTAL AREA OF EXPOSED REFUSE IS AS SPECIFIED FOR WET AND DRY SEASONS 17683	N/A	
(3211) GAS		
☐ GAS MONITORING AND CONTROL AS REQUIRED 17711	I	
(3221) DUST		☒
☐ DUST CONTROL ADEQUATE 17706		
(3231) VECTORS/BIRDS		☒
☐ VECTOR AND BIRD CONTROL ADEQUATE 17707		
☐ LIQUID PONDS MINIMIZE VECTOR PROPAGATION 17713		
(3232) VECTORS (P)		
☐ THRESHOLD VALUES FOR VECTOR POPULATIONS NOT EXCEEDED 17683	N/A	
(3241) DRAINAGE/EROSION		☒
☐ DRAINAGE AND EROSION CONTROL ADEQUATE 17708		
(3251) LITTER		☒
☐ LITTER CONTROL ADEQUATE 17711		
(3252) LITTER (P)		
☐ LITTER NOT ALLOWED TO MIGRATE OFF-SITE 17683	N/A	
(3261) NOISE		☒
☐ NOISE CONTROL ADEQUATE 17712		
(3271) ODOR		☒
☐ ODOR CONTROL ADEQUATE 17713		
(3272) ODOR (P)		
☐ AMBIENT AIR AT OR BEYOND FACILITY BOUNDARY IS NOT ODOROUS 17683	N/A	

	V	C
(3281) TRAFFIC		☒
☐ TRAFFIC CONTROL ADEQUATE WITHIN SITE. TRAFFIC MINIMIZES INTERFERENCE, SAFETY PROBLEMS, AND STACKING ON PUBLIC ROADS 17714		
(3291) EQUIPMENT		
☐ EQUIPMENT ADEQUATE IN TYPE, CAPACITY, AND NUMBER, AND IS ADEQUATELY MAINTAINED 17726		
☒ STANDBY EQUIPMENT AVAILABLE TO C WITH SEC. 17683 AND SECTIONS 17737	I	
(3301) MAINTENANCE		
☐ EFFECTIVE MAINTENANCE PROCEDURES AND PROGRAMS DEVELOPED AND UTILIZED 17731	I	
☐ ADEQUATE MONITORING AND REPAIR OF DETERIORATED CONDITIONS 17732		
(3311) CLOSURE		
☐ AFTER CLOSURE, IF LEACHATE, EXTENSIVE SURFACE CRACKING OR SETTLEMENT OCCURS, THE OWNER SHALL NOTIFY LEA AND SHALL MONITOR AND REPAIR SITE FOR A PERIOD OF 5 YEARS OR LONGER 17734	N/A	
☐ UPON SITE CLOSURE, DETAILED DESCRIPTION MUST BE FILED WITH THE LEA AND WITH THE COUNTY RECORDER 17735		
(3321) SPECIAL WASTES		☒
☐ BURNING WASTES IMMEDIATELY SPREAD AND EXTINGUISHED IN SAFE AREA 17741		
☐ SITE ACCEPTS ONLY APPROVED HAZARDOUS WASTES AND TAKES PRECAUTIONS TO ELIMINATE OR CONTROL HARMFUL DUSTS, FUMES, MISTS, VAPORS, OR GASES 17742	V	
☐ LIQUID WASTES APPROVED BY RWQCB, LOCAL HEALTH ENTITY AND LEA 17743		
☐ DEAD ANIMALS ALLOWED BY LOCAL REGULATIONS 17744		
(3331) OTHER		
☐		

*V = Violation
C = Compliance

390

CALIFORNIA WASTE MANAGEMENT BOARD

DISPOSAL SITE
EVALUATION REPORT

Facility Name: Coastal D.S. Facility ID No.:56-AA-004

Name of Inspector: Richard Hill Inspection Dates:Dec. 20, 1985

Signature: Richard E. Hill

CAC Section:	Observations:	Conclusions:
Disposal Site Information:		
17616 Report of Disposal Site Information	The RDSI does not describe operations at the "Coastal" portion of the site and it does not describe the closure process at the "Santa Clara portion.	Violation
Design Responsibility:		
17626 Design Responsibility	This was a grandfathered facility.	N/A
17627 Ultimate Use	The "Santa Clara" portion is becoming a golf course and the "Coastal" portion will become recreational.	Comply
17628 General Design Parameters	This was a grandfathered site.	N/A
17629 Public Health Design Parameters	This was a grandfathered site.	N/A

Section Manager JKB

Facility Name: Coastal D.S. Facility ID No.:56-AA-004

Name of Inspector: Richard Hill Inspection Dates:Dec. 20, 1985

Signature: Richard E. Hill

CAC Section:	Observations:	Conclusions:
Disposal Site Records:		
17636 Weight/Volume Records	Vehicles are weighed at a scalehouse at the entry. Weight records appeared to be sufficiently accurate for forecasting site filling and planning purposes.	Comply
17637 Subsurface Records	The operator has records showing depth to groundwater and where waste has been placed.	Comply
17638 Special Occurrences	Special occurrence records were not kept for incidents not involving injury or property loss. A system exists for reporting injury and property loss which includes a description of the incident, how the incident was handled and an analysis of how to avoid future similar incidents. This system would be satisfactory if it included operational special occurrences and daily entries. Such an arrangement could be quite valuable to the operator.	Violation
17639 Inspection of Records	Records were available onsite or at nearby district offices during normal business hours.	Comply
Disposal Site Personnel:		
17646 Availability	There was a scalehouse keeper, a spotter, three equipment operators, a site supervisor and a superintendent on site during this inspection. Other personnel were also on site. There were adequate numbers of personnel to operate the landfill.	Comply

Facility Name: Coastal D.S. Facility ID No.: 56-AA-004

Name of Inspector: Richard Hill Inspection Date: December 20, 1985

Signature: Richard E. Hill

CAC Section:	Observations:	Conclusions:
17647 Training	The operation uses an "as needed" training program. A collision between a dozer and the operational scraper caused the cover operation to cease before the working face was covered. Equipment operators frequently impeded traffic flow at the wet weather pad. Future inspections should verify that training is adequate.	Indeterminate
17648 Supervision	There was a site supervisor and a superintendent on site. There were sufficient numbers of supervisory personnel on site.	Comply
17649 Site Attendant	A scalehouse keeper, spotter and site supervisor attended this site.	Comply
Disposal Site Improvements:		
17656 Identification Signs	The site was identified from public roads.	Comply
17657 Entry Signs	Entry signs were posted at the gate-house.	Comply
17658 Site Security	I did not observe unauthorized dumping or use.	Comply
17659 Access Roads	Access roads were smooth and did not generate dust or promote tracking.	Comply

Facility Name: Coastal D.S. Facility ID No.:56-AA-004

Name of Inspector: Richard Hill Inspection Dates:Dec. 20, 1985

Signature: Richard E. Hill

CAC Section:	Observations:	Conclusions:
17660 Internal Roads	Internal roads were smooth, did not inhibit unloading and were signed.	Comply
Disposal Site Health and Safety:		
17666 Sanitary Facilities	Sanitary facilities were available at the on site office.	Comply
17667 Water Supply	City and bottled water were available on site.	Comply
17668 Communications Facilities	There are phones at the facility. Phone #: 659-2130	Comply
17669 Lighting	There was a generator and lighting system at the working face.	Comply
17670 Personnel Health And Safety	The LEA did not require specific items of safety equipment. The operator maintains records of injury accidents which includes an analysis of the accident and future safety equipment requirements.	Comply

Facility Name: Coastal D.S. Facility ID No.:56-AA-004

Name of Inspector: Richard Hill Inspection Dates:Dec. 20, 1985

Signature: Richard E. Hill

CAC Section:	Observations:	Conclusions:
Disposal Site Operations:		
17676 Confined Unloading	Operations were confined to a wet weather pad. The unloading was confined to a well defined area and wind blown material was controlled.	Comply
17677 Spreading and Compacting	Waste was spread and compacted in such a way as to be likely to eliminate voids and rodent harborage.	Comply
17678 Slopes and Cuts	The slope of the working face was maintained at a ratio which allowed effective compaction of waste by the dozers which were being used.	Comply
17679 Final Site Face	The site was not fully evaluated for this standard. The "Santa Clara" portion of this section appeared to comply with this standard except that LEA requirements were not available in the field. Future inspections should verify final site face compliance.	Indeterminat
17680 Stockpiling	Stockpiling did not interfere with other site activities.	Comply

Facility Name: Coastal D.S. Facility ID No.:56-AA-004

Name of Inspector: Richard Hill Inspection Dates:Dec. 20, 1985

Signature: Richard E. Hill

CAC Section:	Observations:	Conclusions:
17681 Availability of Cover	Cover is purchased from off site sources and was arriving during this inspection.	Comply
17682 Cover	Daily cover was not accomplished due to an accident between the only operational scraper on site and a dozer (according to the site supervisor, Mark Bailey). Additionally, daylighting occurred over much of the lift under construction.	Violation
17683 Performance Standards	The site uses daily cover rather than performance standards.	N/A
17684 Intermediate Cover	Areas where waste will not be received for the next 180 days could not be identified. Future inspections will have to verify intermediate cover.	Indeterminate
17685 Final Cover	The "Santa Clara" portion appeared to have final cover.	Comply
17686 Scavenging	Scavenging was not observed.	Comply
17687 Salvaging Permitted	Salvaging is permitted, is conducted in a planned and controlled fashion, and did not interfere with other site activities.	Comply
17688 Volume Reduction and Energy Recovery	VR/ER was not observed.	Comply
17689 Processing Area	Processing was not observed.	Comply

Facility Name: Coastal D.S. Facility ID No.:56-AA-004

Name of Inspector: Richard Hill Inspection Dates:Dec. 20, 1985

Signature: Richard E. Hill

CAC Section:	Observations:	Conclusions:
17690 Storage of Salvage	Salvage was stored in a well defined area segregated from the working face. Storage was not a fire hazard or nuisance.	Comply
17691 Removal	Storage time did not appear likely to cause a health or fire problem.	Comply
17692 Non-Salvageable Items	I did not see non salvageable items salvaged.	Comply
Disposal Site Controls:		
17701 Nuisance Control	The LEA said he was not aware of recent nuisance complaints. I did not observe public nuisances on site.	Comply
17702 Animal Feeding	I did not see animals feeding on waste.	Comply
17703 Fire Control	The site had a water truck operating on site. The spotter's truck was equipped to handle minor fires. There were areas available for spreading and extinguishing waste.	Comply
17704 Leachate Control	The LEA said that recent monitoring results indicate contamination of the Oxnard aquifer. The Santa Clara Sanitary Landfill Closure Plan prepared by VRSD in June 1982 says perched groundwater has been degraded. Future inspectors should review monitoring data which is being currently being collected.	Indeterminat

Name of Facility: Coastal D.S. Facility ID No.: 56-AA-004

Name of Inspector: Richard Hill Inspection Date: Dec. 20, 1985

Signature: Richard E. Hill

CAC Section:	Observations:	Conclusions:
17705 Gas Control	Gas monitoring results indicate high levels of gas. The gas monitoring and control systems should be reviewed by CWMB technical staff to determine compliance with this section. The operator's preparing a revised gas monitoring and control plan for the LEA.	Indeterminate
17706 Dust Control	I did not observe dusty conditions.	Comply
17707 Vector and Bird Control	I did not observe vectors on site. Birds did not appear likely to be a hazard to aviation.	Comply
17708 Drainage and Erosion Control	I did not find clogged drainage structures or waste that was exposed by erosion.	Comply
17709 Contact with Water	I did not observe waste in contact with water.	Comply
17710 Grading of Fill Surfaces	A large pond formed on the east side of the "Coastal" operation due to inadequate grading.	Violation
17711 Litter Control	I did not find litter off site in quantities likely to cause a public nuisance.	Comply
17712 Noise Control	I did not hear noise of a volume likely to cause a public nuisance.	Comply

Facility Name: Coastal D.S. Facility ID No.:56-AA-004

Name of Inspector: Richard Hill Inspection Dates:Dec. 20, 1985

Signature: Richard E. Hill

CAC Section:	Observations:	Conclusions:
17713 Odor Control	I smelled an odor from the upper lift of the active "Coastal" site. The wind was blowing towards the office where I could not detect an odor. Odor was not likely to cause a public nuisance during the inspection.	Comply
17714 Traffic Control	Traffic using the site was not likely to cause a safety hazard. The site has a long entry way.	Comply
17715 Ponded Liquid	I did not see leachate ponds on site.	Comply
Disposal Site Equipment:		
17726 General	There were two dozers, two scrapers, one compactor, one water truck and other equipment on the "Coastal" site. The numbers and types of equipment appeared to be adequate for the "Coastal" operation. However, one dozer, one scraper and the compactor were down. Future inspections should verify that equipment is maintained so as to consistently perform work as intended.	Comply
17727 Standby Equipment	Standby equipment was not available within a short enough time to allow compliance with section 17682. However, equipment failure occurred at the end of the day. Future inspections should verify that standby equipment is available within a reasonably short notice.	Indetermina

Facility Name: Coastal D.S. Facility ID No.: 56-AA-004

Name of Inspector: Richard Hill Inspection Date: Dec. 20, 1985

Signature: Richard E. Hill

CAC Section:	Observations:	Conclusions:
17731 General	Future inspectors will need to verify that preventative maintenance procedures are effective. Inspectors should pay specific attention to heavy equipment maintenance procedures and cover maintenance procedure.	Indeterminat
17732 Operating Site Maintenance	The operator appeared to be in a reasonable state of repair.	Comply
17733 Insp. on Completion	The site is not closed.	N/A
17734 Completed Site Maintenance	The site is not closed.	N/A
17735 Recording	The site was grandfathered and has not closed.	N/A
Disposal Site Special Wastes:		
17741 Burning Wastes	I did not observe burning waste at the site.	Comply
17742 Hazardous Wastes	Uncovered red bag waste was pointed out to site supervisor Mark Bailey.	Violation

Facility Name: Coastal D.S. Facility ID No.:56-AA-004

Name of Inspector: Richard Hill Inspection Dates:Dec. 20, 1985

Signature: Richard E. Hill

CAC Section:	Observations:	Conclusions:
17743 Liquid Wastes	I did not observe liquid waste received at the site.	Comply
17744 Dead Animals	I did not observe dead animals received at the facility.	Comply
Disposal Site Reports and Reviews:		
17751 Periodic Site Review	A 5-year review has not been conducted.	Violation

Notes:

This site, 56-AA-004 is composed of two operations. An inactive landfill operation called "Santa Clara" was in the closure process and was becoming a golf course. An active operation was called "Coastal".

Fm - Read & File

AUG 07 1986

VENTURA REGIONAL SANITATION DISTRICT

1001 PARTRIDGE DRIVE, SUITE 150 • VENTURA, CA 93003-5562

A Public Waste Management Agency

August 5, 1986

John K. Bell, Manager
Monitoring Section
California Waste Management Board
1020 Ninth Street, Suite 300
Sacramento, CA 95814

INSPECTION OF COASTAL LANDFILL, SWFP #56-AA-004

On July 24, 1986, Pamela Badger conducted an inspection of the Coastal landfill. All of my staff who worked with Pamela during the inspection were very impressed by her objectivity and thoroughness. As the inspection progressed, we reached the conclusion that two areas, Sections 17706 and 17707, could be of concern and that further information on our efforts in those areas would be appropriate prior to your completion of the inspection report.

17706 - DUST CONTROL: The 70-acre Coastal site presents a difficult dust control problem during the summer months, as does the entire Oxnard Plain because of the large number of acres of bare grounds and the strong winds off the ocean in the afternoons. Until mid-July, the District maintained a 4,000-gallon and a 2,000-gallon water truck on-site to apply dust control water. On March 26, 1986, the District issued a $74,000 purchase order to have an existing District 633 scraper converted to an 8,000 water tanker. This unit is currently being built and is scheduled for delivery within the next two to three weeks. In addition to the normal water spray nozzles, this unit will be equipped with a water monitor capable of delivering water to isolated dusty spots which cannot currently be reached with existing equipment. A copy of the purchase order and specifications for this unit are enclosed for your information.

17707 - VECTOR AND BIRD CONTROL: The Coastal landfill has a year-round population of sea gulls and other birds, and requires an on-going abatement program to maintain this population within reasonable limits. This is because the land immediately south of the Santa Clara River has been the historic site of the landfill serving the western portion of Ventura County since the burning dumps of the 1940's, known as the Wagon Wheel site, followed by the Santa Clara landfill, and in 1982 the current Coastal site. It appears that because of the relative isolated location of the landfills and the sites being surrounded agricultural land, the gulls were not considered either a nuisance or hazard so no efforts were undertaken to control bird populations. Since

SANTA CLARA / COASTAL
ATTACHMENT #2

opening the Coastal site, the District has attempted numerous programs to control or reduce the number of birds at the site with varying degrees of success. A major difficulty in affecting a behavioral modification on the birds is that these sites have been a feeding ground for generations and are almost genetically patterned into their behavior. As the Coastal site reached its upper lifts, we had to abandon our sea gull abatement wire program because it became increasingly more difficult to maintain and increasingly less effective. This change was approved by the Local Enforcement Agency on March 21, 1986.

In early April, the District instituted an intensive abatement program to totally drive the birds off the site and keep them away long enough to cause them to seek a new feeding ground. We were successful in phase 1; however we created a new problem in that the birds relocated to the adjacent golf course and agricultural fields resulting in numerous complaints to the District and requests that we end the program so the birds would return to the landfill and leave the golf course and fields. Additionally, the cost to the District for the intensified program was $5,000 per week. Copies of the correspondence and the District's sea gull abatement program are enclosed for your information. When the operation moves to the northern portion of the site in September, the District will reinstall the sea gull abatement wires. Nevertheless, the District does not consider the present bird population to constitute a nuisance or hazard that would place the site in violation of this section of the State Minimum Standards.

If you have any questions regarding this information, please call me at 805-658-4620. I enjoyed the opportunity to talk with you during your brief visit and look forward to further visits.

ROBERT A. EPLER - SOLID WASTE MANAGER

GF/RAE1
Enc.

cc: Terrence O. Gilday

Working file

STATE OF CALIFORNIA

GEORGE DEUKMEJIAN, Governor

CALIFORNIA WASTE MANAGEMENT BOARD
1020 NINTH STREET, SUITE 300
SACRAMENTO, CA 95814

AUG 08 1986

2nd INSPECTION
7/25/86
SENT 8/8/86

To: Mr. Robert Epler, Manager
Solid Waste, Ventura Regional Sanitation District
1001 Partridge Drive, Suite 150
Ventura, CA 93003-5562

Subject: Report of inspection: Santa Clara Sanitary Landfill
56-AA-04

Government Code Section 66796.38 requires the California Waste Management Board (Board) to conduct inspections of solid waste facilities for the purpose of evaluating compliance with the State Standards for Solid Waste Handling and Disposal (Title 14. California Administrative Code, Division 7 Chapter 3, commencing with section 17200). Under this program, each facility will be inspected at least three separate times. As you are aware by now, staff has already conducted two of these inspections at the subject facility. The dates of those inspections were 12/20/85 and 7/25/86. A report resulting from the recent inspection is enclosed. If photographs are referred to in the inspection report, copies will be obtainable upon written request.

The goal of our inspection program is to verify compliance with each of the State Minimum Standards, not merely to find violation(s) of these standards. In order to achieve this we will, as I stated above, be inspecting each facility at least three times. This will provide the following advantages over the previous inspection techniques:

* The program will provide greater fairness to operators of facilities by reducing the possibility that one operator will be inspected under adverse conditions and another under favorable conditions.

* The program will allow for evaluation of conditions, which show seasonal variations such as effectiveness of leachate control systems, vectors, dust, etc.

* The program will provide a track record of compliance which will be used in evaluating standards for which a single violation may not be sufficient reason to place the facility on the State List of Non-Complying Facilities when the facility is generally in compliance with that standard, i.e., the daily cover standard.

SANTA CLARA / COASTAL

ATTACHMENT #3 404

Although we do not intend to provide advance notice of the inspection dates to operators, the Local Enforcement Agency (LEA) will be notified of those dates, and will be invited to accompany our staff on the inspection.

If, after three inspections, your facility continues to be operating in violation of one or more of the State Minimum Standards you will be notified of this finding by certified letter. A copy of that letter will be sent to the LEA. After 90 days or upon notification of correction of all violations(s), Board staff will reinspect the facility. If the facility is still in violation, staff will notify you and the LEA, by certified letter of staff's intent to recommend that the Board place the facility's name on the State List of Non-Complying Facilities at a regularly scheduled meeting of the Board. Should the Board place the facility on that list, State law (Government Code 66796.39) requires that the LEA develop a compliance schedule for correction of the violation(s). If compliance is not achieved within one year, Government Code section 66796.39 directs LEAs to revoke facility operating permits. If the facility is closed or abandoned, staff will recommend that the LEA issue a notice of violation and an order to correct the violations. That Notice and Order will also notify you or the owner of the facility that State law provides that "the unremedied condition of the facility is prima facie evidence of negligence, and in any action for damages against the owner of the property for injury caused by the unremedied condition, the burden of proving the injury was not caused by an unremedied condition shall be on the owner of the property".

If you have any questions regarding the program, please contact me at (916) 322-1769.

Sincerely,

John K. Bell, Manager
Monitoring Section

cc: Mr. Richard Hauge, Ventura County Environmental Health

Ventura Coastal Corporation

mea

CALIFORNIA WASTE MANAGEMENT BOARD

DISPOSAL SITE
EVALUATION REPORT

Facility Name: Santa Clara/Coastal Sanitary Landfill

Facility ID No.: 56-AA-04

Name of Inspector: P. Badger

Inspection Dates: 7/25/86

Signature: P. Badger

CAC Section:	Observations:	Conclusions:
Disposal Site Information:		
17616 Report of Disposal Site Information	The Report of Disposal Site Information (RDSI) does not reflect the closure of the Santa Clara portion of the site. Operations on the Coastal portion of the site differ from the RDSI in the following: Site address, description of access, cover material type, equipment type and numbers, nearest residence, tonnage received, actual acreage permitted, gas and water monitoring, and resume of management organization.	Violation
Design Responsibility:		
17626 Design Responsibility	This standard applies to new facilities only.	N/A
17627 Ultimate Use	The Santa Clara Landfill has become a golf course. The ultimate use for the Coastal landfill is designated as recreational.	Comply
17628 General Design Parameters	The site design accounted for all factors in Section 17628.	Comply
17629 Public Health Design Parameters	The design appeared to meet the criteria listed in Section 17629.	Comply

Section Manager: [illegible]

Facility Name: Santa Clara/Coastal Sanitary Landfill **Facility ID No.:** 56-AA-04

Name of Inspector: P. Badger **Inspection Dates:** 7/25/86

Signature: P. Badger

CAC Section:	Observations:	Conclusions:
17636 Weight/Volume Records	Records were kept which were adequate for forecasting the rate of site filling and for planning purposes. The site has been averaging approximately 2000 TPD.	Comply
17637 Subsurface Records	Subsurface records were maintained by the operator.	Comply
17638 Special Occurrences	Two logs of special occurrences were maintained, one by the site supervisor, and one at the gatehouse.	Comply
17639 Inspection of Records	Records were available during normal business hours.	Comply
Disposal Site Personnel:		
17646 Availability	No operation appeared to be restricted by a lack of personnel.	Comply
17647 Training	This site has an apprentice type training program. Site personnel complete about 40 hours of classes each year on landfill operation, safety, etc.	Comply
17648 Supervision	There were supervisory personnel on site.	Comply
17649 Site Attendant	The site was attended during operating hours. There was a spotter at the working face.	Comply
Disposal Site Improvements:		
17656 Identification Signs	I.D. signs contained the required information.	Comply

Facility Name: Santa Clara/Coastal Sanitary Landfill **Facility ID No.:** 56-AA-04

Name of Inspector: P. Badger **Inspection Dates:** 7/25/86

Signature: P. Badger

CAC Section:	Observations:	Conclusions:
17657 Entry Signs	Entry signs contained the required information.	Comply
17658 Site Security	The site had a gate which was locked except during operating hours. I did not observe evidence of unauthorized access to the facility.	Comply
17659 Access Roads	Roads were smooth and allowed good access to the site. I did not see excessive dust or tracking of waste onto public roads.	Comply
17660 Internal Roads	Internal roads were smooth and allowed good access to the unloading areas. Roads were suitably signed.	Comply
Disposal Site Health and Safety:		
17666 Sanitary Facilities	Sanitary facilities were available on site.	Comply
17667 Water Supply	Drinking water was supplied.	Comply
17668 Communications Facilities	There were phones on site. Phone #: (805) 659-2130	Comply
17669 Lighting	This site does not operate during hours of darkness.	Comply
17670 Personnel Health and Safety	Most of the site equipment was supplied with environmental cabs. Employees on open cab equipment were supplied with dust filtering helmets and ear protection. All equipment operators are required to wear seat belts.	Comply

Facility Name: Santa Clara/Coastal Sanitary Landfill **Facility ID No.:** 56-AA-04

Name of Inspector: P. Badger **Inspection Dates:** 7/25/86

Signature: P. Badger

CAC Section:	Observations:	Conclusions
Disposal Site Operations:		
17676 Confined Unloading	The unloading area was reasonably confined.	Comply
17677 Spreading and Compacting	Waste was adequately spread and compacted to eliminate voids.	Comply
17678 Slopes and Cuts	The slope of the working face was of an angle that appeared to allow effective compaction by the type of vehicles used.	Comply
17679 Final Site Face	The final site face had a neat and finished appearance and was of an acceptable slope.	Comply
17680 Stockpiling	Stockpiling did not interfere with other site activities.	Comply
17681 Availability of Cover	Cover was available on site.	Comply
17682 Cover	Daily cover was applied. (See slides # 1.1-1.4 and 2.5-2.7)	Comply
17683 Performance Standards	This was not a performance standard site.	N/A
17684 Intermediate Cover	It appeared that intermediate cover was applied where appropriate. There was no exposed waste in intermediate cover areas.	Comply
17685 Final Cover	Areas of final cover did not have exposed waste.	Comply

Facility Name: Santa Clara/Coastal Sanitary Landfill **Facility ID No.:** 56-AA-04

Name of Inspector: P. Badger **Inspection Dates:** 7/25/86

Signature: P. Badger

CAC Section:	Observations:	Conclusions:
17686 Scavenging	I did not observe any scavenging.	Comply
17687 Salvaging Permitted	Salvaging is permitted and occurred in a clearly defined, organized and controlled manner.	Comply
17688 Volume Reduction and Energy Recovery	Volume Reduction and Energy Recovery were not observed.	Comply
17689 Processing Area	Salvaging occurred in a clearly defined area.	Comply
17690 Storage of Salvage	Storage of salvage occurred in clearly defined areas and was not likely to cause a safety hazard or public nuisance.	Comply
17691 Removal	Salvage storage time did not seem excessive or likely to cause a safety or fire hazard or become a public nuisance.	Comply
17692 Non-Salvageable Items	I did not observe the salvage of any items considered non-salvageable by this section.	Comply
Disposal Site Controls:		
17701 Nuisance Control	The operation did not appear to be likely to cause a public nuisance.	Comply
17702 Animal Feeding	I did not observe animals feeding on waste.	Comply
17703 Fire Control	The site had appropriate fire fighting equipment. I did not observe any fires or see evidence of recent fires.	Comply

Facility Name: Santa Clara/Coastal Sanitary Landfill **Facility ID No.:**56-AA-04

Name of Inspector: P. Badger **Inspection Dates:** 7/25/86

Signature: P. Badger

CAC Section:	Observations:	Conclusions:
17704 Leachate Control	The Santa Clara section of the site has six groundwater monitoring stations with three wells each. The Los Angeles Regional Water Quality Control Board (RWQCB) has accepted data from both the Santa Clara and Bailard sites to be used at the Coastal site for water quality monitoring until its closure plan has been accepted and implemented. Dennis Dasker of the RWQCB said this site was considered to be in compliance with Subchapter 15 requirements as of the time of my inspection. This section shall be indeterminate because of the lack of independent test data confirming the operator's recorded data on the shallow wells.	Indeterminat
17705 Gas Control	There are 39 gas probes around the Santa Clara section of the landfill, and four on the (on-site) clubhouse. Each probe has two wells, at a 4 and 10 foot depth. I tested the clubhouse and southern perimeter methane monitoring wells that were currently accessible during construction. There is a methane recovery and control plant on the northewest corner of the site. The site is monitored for gas monthly. The methane concentration at the perimeter was less than 5% total methane. Dave Long of the Ventura County Regional Sanitation District described to my satisfaction how the gas collection well overlap was determined at the time of design.	Comply

Facility Name: Santa Clara/Coastal Sanitary Landfill **Facility ID No.:** 56-AA-04

Name of Inspector: P. Badger **Inspection Dates:** 7/25/86

Signature: P. Badger

CAC Section:	Observations:	Conclusions:
17706 Dust Control	This site was excessively dusty on the day of this inspection. Dust blew off the Coastal site onto the Santa Clara site's golf course. (See slides # 2.7 and 2.8.) This site is in the process of getting a larger water truck. Subsequent inspectors should check to see if this equipment has been received.	Violation
17707 Vector and Bird Control	There were a lot of gulls on site. The golf course at Santa Clara had so many coming from the landfill that they had to shoot off crackers. The landfill did not have any active gull abatement program on the day of my inspection. The operator should have a daily gull control program. (See slides # 1.5 and 2.2)	Violation
17708 Drainage and Erosion Control	I did not observe inadequate drainage control or inadequate erosion control. A new drain system has been dug around the Coastal section. The Santa Clara section has cement-lined drains.	Comply
17709 Contact with Water	I did not observe waste in contact with water.	Comply
17710 Grading of Fill Surfaces	Grading appeared to account for settlement and promote lateral runoff.	Comply
17711 Litter Control	Although there was a lot of litter at the working face, this litter was collected by litter fences. I did not observe litter leaving the site.	Comply
17712 Noise Control	Noise levels did not seem likely to cause a public nuisance.	Comply

Facility Name: Santa Clara/Coastal Sanitary Landfill **Facility ID No.:**56-AA-04

Name of Inspector: P. Badger **Inspection Dates:** 7/25/86

Signature: P. Badger

CAC Section:	Observations:	Conclusions:
17713 Odor Control	I did not detect odors on or off site that were likely to cause a public nuisance.	Comply
17714 Traffic Control	Traffic flow did not appear likely to cause a public safety hazard and I did not observe vehicles stacking onto public roads.	Comply
17715 Ponded Liquid	This site did not have any ponded liquid.	Comply
Disposal Site Equipment:		
17726 General	There appears to be sufficient equipment on the Coastal site for it to operate adequately. The equipment maintenance program is becoming computerized and is quite thorough.	Comply
17727 Standby Equipment	Adequate standby equipment was available on site.	Comply
Disposal Site Maintenance:		
17731 General	Equipment and facility maintenance programs appeared adequate.	Comply
17732 Operating Site Maintenance	Defective or deteriorated conditions were not observed.	Comply
17733 Insp. on Completion	There is no record in the California Waste Management Board files concerning an inspection upon completion of the Santa Clara landfill. However, site improvements and inspections have occurred since this time.	Comply

Facility Name: Santa Clara/Coastal Sanitary Landfill **Facility ID No.:** 56-AA-04

Name of Inspector: P. Badger **Inspection Dates:** 7/25/86

Signature: P. Badger

CAC Section:	Observations:	Conclusions:
17734 Completed Site Maintenance	The Santa Clara portion of this site is being maintained by the City of Oxnard as a golf course.	Comply
17735 Recording	This site pre-exists the implementation of this standard.	Comply
Disposal Site Special Wastes:		
17741 Burning Wastes	I did not observe burning wastes. There was space available for spreading and extinguishing burning waste.	Comply
17742 Hazardous Wastes	I did not observe hazardous wastes received.	Comply
17743 Liquid Wastes	I did not observe the dumping of any liquid wastes. Liquid wastes are not permitted at this site.	Comply
17744 Dead Animals	I did not observe dead animals being received.	Comply
Disposal Site Reports and Reviews:		
17751 Periodic Site Review	The current permit was issued in 1979. A five year review was due 1984, and has not yet been completed.	Violation

Notes:

During parts of this inspection I was accompanied by Mr. Mark Baily, Mr. Robert Epler, and Mr. Charles Pierce, all of the Ventura Regional Sanitation District. The weather was fair with a strong wind out of the west in the afternoon.

SWIS-00 (REV. 1/85)

NOTICE OF INSPECTION DISPOSAL SITE

LOCAL ENFORCEMENT AGENCY: Ventura County Environmental Health

[redacted]

T-OUT

T-IN

[redacted]

FACILITY NAME: Santa Clara / Coastal Sanitary Landfill.

FACILITY LOCATION: Oxnard

INSPECTOR: Badger

ALSO PRESENT: M. Bailey, R. Eder, C Pierce

RECEIVED BY:

Operator _____

Owner _____

Comments: The Report of Disposal Site Information is out of date. It was excessively dusty at Coastal during my inspection. There was no dust abatement activity - this should be a daily effort. The site is overdue for its five year Permit & Engineering site reviews.

	*V	C
(3011) RECORDS		
ACCURATE WEIGHT/VOLUME RECORDS MAINTAINED 17636		
ADEQUATE SUBSURFACE RECORDS MAINTAINED 17637		
LOG OF SPECIAL OCCURRENCES MAINTAINED 17638		
RECORDS AVAILABLE FOR INSPECTION 17639		
(3021) PERSONNEL		
ADEQUATE NUMBER OF QUALIFIED PERSONNEL AVAILABLE 17646		
PERSONNEL ADEQUATELY TRAINED 17647		
ADEQUATE SUPERVISION PROVIDED 17648		
SITE ATTENDANT AVAILABLE FULL-TIME OR AS DETERMINED BY LEA 17649		
(3031) SIGNS		
IDENTIFICATION SIGNS AT EACH POINT OF ACCESS 17656		
ENTRY SIGN STATES FEES, HOURS OF OPERATION, WASTES ACCEPTED/NOT ACCEPTED 17657		
NON-HAZARDOUS UNATTENDED SITES HAVE SIGN WARNING USERS OF UNAVAILABILITY OF COMMUNICATION FACILITIES 17658		
(3041) SECURITY		
ADEQUATE PERIMETER SECURITY, HAZARDOUS AREAS FENCED AND IDENTIFIED 17659		
(3051) ROADS		
ACCESS ROADS HAVE SMOOTH SURFACE, MINIMIZE DUST AND TRACKING OF MUD, AND ALLOW ALL-WEATHER ACCESS 17660		
INTERNAL ROADS IN SAFE CONDITION, PROVIDE ACCESS DURING INCLEMENT WEATHER, AND ARE PROVIDED WITH DIRECTIONS 17661		
(3071) SANITATION		
ADEQUATE SANITARY FACILITIES AVAILABLE 17666		
SAFE ADEQUATE DRINKING WATER AVAILABLE 17667		
(3081) COMMUNICATIONS		
COMMUNICATION FACILITIES AVAILABLE WHERE HAZARDOUS WASTES ARE ACCEPTED 17668		
(3091) LIGHTING		
LIGHTING ADEQUATE 17669		
(3101) SAFETY		
SAFETY EQUIPMENT IN USE AND BEING WORN 17670		

	V	C
(3111) CONFINED UNLOADING		
UNLOADING ADEQUATELY CONFINED 17675		
(3141) SPREADING/COMPACTING		
SPREADING AND COMPACTION IN TWO-FOOT LAYERS 17677		
(3151) SLOPES/CUTS/GRADING		
WORKING FACE SLOPES ALLOW EFFECTIVE COMPACTION. DEPTH OF CUTS AND SLOPES OF TRENCH SIDES AS APPROVED BY LEA 17678		
FINAL SLOPES HAVE NEAT APPEARANCE AND ARE 1-3/4 : 1 OR FLATTER 17679		
GRADING OF FILL SURFACES ADEQUATE 17716		
(3161) COVER		
STOCKPILING OF COVER DOES NOT INTERFERE WITH OPERATIONS 17680		
SUITABLE QUALITY AND SUPPLY OF COVER MATERIAL AVAILABLE 17681		
COVER PROVIDED AT REQUIRED DEPTH AND FREQUENCY 17682		
INTERMEDIATE COVER PROVIDED AT REQUIRED DEPTH AND FREQUENCY 17684		
FINAL COVER PROVIDED AS REQUIRED 17683		
(3171) SALVAGING/PROCESSING		
SCAVENGING PROHIBITED 17686		
SALVAGING DOES NOT INTERFERE WITH OPERATIONS 17687		
VOLUME REDUCTION AND ENERGY RECOVERY DO NOT INTERFERE WITH OPERATIONS OR CREATE HEALTH, SAFETY OR ENVIRONMENTAL PROBLEMS 17688		
SALVAGING AND VOLUME REDUCTION CONFINED TO CLEARLY IDENTIFIED AREAS 17689		
SALVAGE STORAGE LOCATION OK, VOLUME AS APPROVED BY LEA, MINIMIZES FIRE, NUISANCE 17690		
SALVAGE STORAGE TIME DOES NOT RESULT IN HEALTH OR FIRE PROBLEMS 17691		
SALVAGED MATERIALS APPROVED BY LEA AND LOCAL HEALTH 17692		
(3181) NUISANCE		
OPERATIONS DO NOT CREATE A PUBLIC NUISANCE 17701		
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	V	C
(3191) FIRE		
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(3192) FIRE (P)		
BURNING MATERIALS SPREAD AND EXTINGUISHED. LEA, SWRB NOTIFIED IMMEDIATELY OF FIRE NOT EXTINGUISHED IN 24 HOURS 17683		
(3201) LEACHATE		
ADEQUATE STEPS TAKEN TO MONITOR, COLLECT, TREAT, AND DISPOSE OF LEACHATES 17704		IND
NO WASTES IN DIRECT CONTACT WITH WATER EXCEPT AS APPROVED BY RWQCB 17705		
(3202) LEACHATE (P)		
REFUSE COVERED WITH NEXT DAY'S REFUSE OR WITH SIX INCHES OF COMPACTED SOIL. TOTAL AREA OF EXPOSED REFUSE IS AS SPECIFIED FOR WET AND DRY SEASONS 17684		
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(3251) LITTER		
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	V	C
(3281) TRAFFIC		
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(3291) EQUIPMENT		
EQUIPMENT ADEQUATE IN TYPE, CAPACITY, AND NUMBER, AND IS ADEQUATELY MAINTAINED 17726		
STANDBY EQUIPMENT AVAILABLE TO COMPLY WITH SEC. 17682 AND OTHER SECTIONS 17727		
(3301) MAINTENANCE		
EFFECTIVE MAINTENANCE PROCEDURES AND PROGRAMS DEVELOPED AND UTILIZED 17731		
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(3311) CLOSURE		
AFTER CLOSURE, IF LEACHATE, EXTENSIVE SURFACE CRACKING OR SETTLEMENT OCCURS, THE OWNER SHALL NOTIFY LEA AND SHALL MONITOR AND REPAIR SITE FOR A PERIOD OF 5 YEARS OR LONGER 17734		
UPON SITE CLOSURE, DETAILED DESCRIPTION MUST BE FILED WITH THE LEA AND WITH THE COUNTY RECORDER 17735		
(3321) SPECIAL WASTES		
BURNING WASTES IMMEDIATELY SPREAD AND EXTINGUISHED IN SAFE AREA 17741		
SITE ACCEPTS ONLY APPROVED HAZARDOUS WASTES AND TAKES PRECAUTIONS TO ELIMINATE OR CONTROL HARMFUL DUSTS, FUMES, MISTS, VAPORS, OR GASES 17742		
LIQUID WASTES APPROVED BY RWQCB, LOCAL HEALTH ENTITY AND LEA 17743		
DEAD ANIMALS ALLOWED BY LOCAL REGULATIONS 17744		
(3321) OTHER		
17616 RDSI		
17751 Site Review		

*V = Violation
C = Compliance

4/5

DISTRIBUTION: WHITE — CWMB YELLOW — OPERATOR PINK — LEA

SEP 0 2 1986

RESOURCE MANAGEMENT AGENCY

county of ventura

Environmental Health Department
Donald W. Koepp
Director

August 27, 1986

California Waste Management Board
1020 9th St. Suite 300
Sacramento CA 95814
Attn: John Bell

SWFP 56-AA-004, COASTAL/SANTA CLARA LANDFILL INSPECTIONS

We have reviewed the CWMB inspection reports of December 20, 1985 and July 25, 1986. Violations of California Administrative Code, Title 14, sections 17616 and 17751 were indicated on both reports. Section 17616 requires the RDSI to be amended to keep it current. Section 17751 requires periodic review of the site design, implementation and operation. The City of Oxnard is currently preparing closure plans for the Santa Clara portion and the Ventura Regional Sanitation District is preparing closure plans for the Coastal portion. When these documents are completed, applications for separate closure permits will be filed. The closure plans and permits will satisfy the requirements of Title 14 including sections 17616 and 17751. No other violations noted on your December 20, 1985 report was repeated on your July 25, 1986 report.

The July 25, 1986 violations of sections 17706, dust, and 17707, birds, were also checked during an inspection of Coastal by Richard Sweet of Ventura County Environmental Health Department on July 31, 1986. Dust was confined to the Coastal site, however, control could have been improved. We did note a violation of section 17726 because of a leaking water truck. A new water vehicle is ordered for the end of August.

Birds have been a long time concern and various control methods have been used to minimize the problems. Bird wire use has been temporarily discontinued but projectile crackers and whistlers must be used as often as necessary to minimize the bird problem. Bird wires will be reinstituted when the larger, lower fill area to the north is used, probably within the next couple of months. We did not mark dust or birds as violations.

The violations we marked on Environmental Health Department's inspection of July 31, 1986 were related to standing water (sec. 17708 & 17715) and liquid waste (sec. 17743). Standing water and mosquito larvae were observed in the east perimeter drain. Liquid waste was deposited on June 17, 1986.

A copy of our August 13, 1986 letter to the Ventura Regional Sanitation District is enclosed. We feel vigilance for potential liquid seepage is prudent because of high groundwater conditions in the area and because the groundwater monitoring plan has not been implemented or evaluated by the Los Angeles Regional Water Quality Control Board. As noted on your July 25, 1986 inspection report, compliance with section 17704, leachate control, was "indeterminate."

SANTA CLARA/COASTAL
ATTACHMENT #4

800 South Victoria Avenue, Ventura, CA 93009 (805) 654-2813

We feel that the noted violations are being addressed and scheduled for correction. Our routine inspections will be continued monthly. Please feel free to contact Richard Sweet at (805) 654-2433 if you have any questions.

Terrence Gilday

TERRENCE O. GILDAY, SUPERVISOR
TECHNICAL SERVICES SECTION
ENVIRONMENTAL HEALTH DEPARTMENT

RS/pp

Working File

STATE OF CALIFORNIA

GEORGE DEUKMEJIAN, Governor

CALIFORNIA WASTE MANAGEMENT BOARD
1020 NINTH STREET, SUITE 300
SACRAMENTO, CA 95814

FEB 20 1987

To: Mr. John Conaway, Solid Waste Manager
Ventura Regional County Sanitation District
1001 Partridge Drive, Suite 150
Ventura, CA 93003

Subject: Report of Inspection: Santa Clara/Coastal Landfill (56-AA-0004)

Government Code Section 66796.38 requires the California Waste Management Board (Board) to conduct inspections of solid waste facilities for the purpose of evaluating compliance with the State Standards for Solid Waste Handling and Disposal (Title 14. California Administrative Code, Division 7 Chapter 3, commencing with section 17200). Under this program, each facility will be inspected at least three separate times. As you are probably aware, the subject facility received its third inspection on January 8, 1987. Enclosed please find the Evaluation Report resulting from this third inspection. Copies of photographs or slides referred to in the report are available from the Board upon written request.

Results of the three field inspections along with all pertinent supporting data in our files have now undergone staff review. A final staff report is currently being prepared and will be sent to you as soon as possible. We are concerned with the following repeated and/or uncorrected violations of State Minimum Standards:

17616 - RDSI (ongoing)

17682 - Cover (repeated)

17705 - Gas Control (ongoing)

17710 - Grading of Fill Surfaces (ongoing)

We are also concerned with possible surface leachate control problems at the golf course and adequacy of the levee along the north perimeter of the Santa Clara section of the site.

At the March meeting of the California Waste Management Board tentatively scheduled for March 26 and 27, 1987, staff will report on its evaluation of the subject facility. Staff will recommend that the Board direct you to take specific corrective actions to gain compliance with State Minimum Standards. If the

SANTA CLARA/COASTAL
ATTACHMENT #5

Board accepts this recommendation, you will be directed to submit a letter to the Board within 30 days stating specific dates for initiating and completing the corrective actions.

If this letter is not received by the Board within 30 days, or if the dates for implementing the required actions are not met, progress towards compliance will be deemed unsatisfactory. Verification of all deadlines will be made through additional staff inspections as necessary. If at any time progress is deemed unsatisfactory, a 90 day notice will be issued by the Chief Executive Officer stating the Board's intent to place the site on the State List of Non-Complying Facilities.

You should be aware that the Board may direct staff to issue a 90 day notice of it's intent to list the site rather than allow for additional time for compliance as recommended by staff.

You are invited to address the Board with any information you feel the Board should consider at it's March meeting. A notice of the meeting will be sent at least 10 days prior to the scheduled date.

A copy of this letter and the enclosed report will be sent to the LEA. If you have any questions regarding this program, please contact me at (916) 322-1769

Sincerely,

John K. Bell, Manager
Monitoring Section

Enclosure

cc Richard Hauge, Ventura Co. Environmental Health

mea

CALIFORNIA WASTE MANAGEMENT BOARD

SOLID WASTE FACILITY
EVALUATION REPORT

Facility Name: Santa Clara/Coastal L.F. Facility ID No.: 56-AA-0004

Name of Inspector: Jack W. Miller Inspection Dates: 1/8/87

Signature: Jack W. Miller

LEGEND

C = Compliance V = Violation
I = Indeterminate N = Not Applicable

CAC	SECTION	OBSERVATIONS	RESULT
		DISPOSAL SITE INFORMATION	
17616	Report of Disposal Site Information.	The following differences were observed between operations as described in the facility RDSI dated June, 1978 and those actually occurring at the site: 1) The RDSI does not reflect the closure of the "Santa Clara" portion of the landfill nor the operation of a golf course on this area. 2) The RDSI does not reflect the opening of the "Coastal" portion of the landfill. 3) The RDSI states that the address and vehicle entrance to the site are at 2501 N. Ventura Road, Oxnard. They are now at 4105 W. Gonzales Road, Oxnard.	V

Section Manager

CAC	SECTION	OBSERVATIONS	RESULT
17616	Report of Disposal Site Information (Continued)	4) The methane gas collection and gas to energy operation on the "Santa Clara" portion of the landfill is not described. 5) The RDSI states that the nearest residence is 1/2 away from the site perimeter. There is a convent within 1000 feet of the Coastal portion of the site. The Raddison Hotel is now directly adjacent to the southwest perimeter of the "Santa Clara" portion of the fill. 6) The RDSI states that site operating hours are 7:00 a.m. to 5:00 p.m. I observed unloading operations occurring at the site prior to 7:00 a.m.	
		DESIGN RESPONSIBILITY.	
17626	Design Responsibility	This standard only applies to new facilities.	N
17627	Ultimate Use.	This standard only applies to new facilities permitted after 1975. This site commenced operations in 1974.	N
17628	General Design Parameters.	This standard only applies to new facilities permitted after 1975. This site commenced operations in 1974.	N
17629	Public Health Design Parameters	On February 12, 1986 the Flood Control Section of the Ventura County Public Works Department determined that the levee protecting the "Santa Clara" portion of the landfill along the Santa Clara River was inadequate to protect the landfill from a 100 year flood. The L.A. RWQCB is now investigating the adequacy of the levee. Site compliance with CAC Section 17629 will remain indeterminate pending the results of the L.A. RWQCB investigation.	I

Inspector: Jack W Miller

CAC	SECTION	OBSERVATIONS	RESULT
		DISPOSAL SITE RECORDS.	
17636	Weight/Volume Records.	Incoming loads of waste were weighed at the gatehouse and recorded. Mark Baily, Site Supervisor, stated that the site was receiving an average of 1,800 to 1,900 tons of waste per day.	C
17637	Subsurface Records.	I reviewed subsurface records and grading plans for the "Coastal" portion of the landfill at the site office. John Conaway, VRSD Solid Waste Manager, stated that no excavations were made at the "Santa Clara" portion of the site before waste was landfilled. The quarterly groundwater monitoring report of 5/2/86 indicated that the depth to groundwater varied between 34 and 39 feet.	C
17638	Special Occurrences.	I observed a log of special occurrences maintained on a daily basis by Mark Baily, Site Supervisor.	C
17639	Inspection of Records.	Records were made available for my review at the site office.	C
		DISPOSAL SITE PERSONNEL.	
17646	Availability.	No site operation was observed to be limited by a lack of personnel.	C
17647	Training.	Site personnel receive on-the-job training and are encouraged to complete a 12 week landfill management certification program. Equipment operators are regularly checked for knowledge of proper operating procedures.	C

Inspector: Jack W Miller

CAC	SECTION	OBSERVATIONS	RESULT
17648	Supervision.	Site supervisors Mark Baily and David Jackson were on site during the inspection. I did not observe a problem related to a lack of site supervision.	C
17649	Site Attendant.	I observed that an attendant directed traffic and unloading activities at the working area.	C
		DISPOSAL SITE IMPROVEMENTS.	
17656	I.D. Signs.	The public access point at 4105 W. Gonzales Road was identified with signs indicating the name of the site operator (Slides 1, 2,).	C
17657	Entry Signs.	Signs indicating hours of operation, a schedule of fees, and types of waste not accepted were posted at the main gate and at the gatehouse (Slides 2, 3, 4).	C
17658	Site Security.	The "Coastal" portion of the site was secured from unauthorized access by fencing and a deep perimeter drainage channel around 3/4 of the site. The fourth side bordered on the Santa Clara River. The site access road was controlled with a lockable gate. A golf course was in operation on the "Santa Clara" portion of the site.	C
17659	Access Roads.	The main access road used by the public was paved and in good repair. I did not observe waste or dirt tracked onto public streets. Dust was not a problem (Slide 1).	C
17660	Internal Roads.	The main internal road used by the public was graded and allowed good access to the unloading area (Slide 55). Note: Internal utility roads adjacent to the site perimeter drain had been deeply grooved by heavy equipment being used to repair the drain (Slides 47, 48, 49, 50, 52, 53). These roads needed regrading.	C

Inspector: Jack W Miller

CAC	SECTION	OBSERVATIONS	RESULT
		DISPOSAL SITE HEALTH AND SAFETY.	
17666	Sanitary Facilities.	I observed that sanitary facilities were available at the site office.	C
17667	Water Supply.	I observed that bottled drinking water was available at the site office.	C
17668	Communication Facilities.	Communication facilities were available at the site office. The phone number at the gatehouse was (805) 656-3671. The number at the site office was (805) 984-3313.	C
17669	Lighting.	The site had a large portable light stand for illuminating the unloading area during early morning operations.	C
17670	Personnel Health and Safety.	Specific items of safety equipment were not required by the Local Enforcement Agency.	C
		DISPOSAL SITE OPERATIONS.	
17676	Confined Unloading.	Unloading was confined to an area 300 feet wide near the toe of the working face. This area was divided into commercial and public unloading areas (Slides 19, 20, 22).	C
17677	Spreading and Compacting.	I observed that incoming waste was spread in layers that did not exceed 2 feet in depth prior to compaction by landfill equipment (Slides 10, 20, 21, 23).	C
17678	Slopes and Cuts.	The slope of the working face was 5 degrees as measured with a clinometer. This slope allowed landfill equipment to spread and compact waste so that voids were eliminated (Slides 10, 20, 21, 23).	C

Inspector: Jack W. Miller

CAC	SECTION	OBSERVATIONS	RESULT
17679	Final Site Face.	Faces on the "Santa Clara" portion of the landfill were final and supported the River Ridge Golf Course (Slides 63-98). No slope exceeded a horizontal to vertical ratio of 1 3/4 to 1 as measured with a clinometer. Although near completion, the "Coastal" portion of the site had not received a final exterior surface.	C
17680	Stockpiling.	Cover material was stockpiled near the main access road approximately 750 feet east of the working area (See attached site map) (Slide 57). This stockpile was situated so as not to interfere with other site operations.	C
17681	Availability of Cover.	A large pile of cover material was stockpiled on site (Slide 57). Availability of cover material was not observed to be a problem.	C
17682	Cover.	When I arrived at the working face at 7:30 a.m., I observed that waste deposited the previous day had not been completely covered with six inches of compacted cover material (Slides 6, 7, 9, 11, 12, 13, 14, 15, 16, 17, 18, 21).	V
17683	Performance Standards.	The site was not operating on performance standards.	N
17684	Intermediate Cover.	Daylighting of waste was observed on several areas of the "Coastal" portion of the landfill which Mark Baily, Site Supervisor, described as having 12 inches of compacted intermediate cover (See attached site map) (Slides 26, 27, 28, 29).	V
17685	Final Cover.	The "Coastal" portion of the site has yet to receive final cover. The "Santa Clara" portion has at least two feet of compacted final cover as indicated by the "Santa Clara Sanitary Landfill Closure Plan" (VRCSD; June, 1982).	C

Inspector: Jack W. Miller

CAC	SECTION	OBSERVATIONS	RESULT
17686	Scavenging.	Scavenging was not observed.	C
17687	Salvaging Permitted.	Salvaging is permitted but no salvaging operations were observed to be occurring at the site. Note: A recycling center was in operation on the adjacent Bailard Landfill (56-AA-011).	C
17688	Volume Reduction and Energy Recovery.	A methane gas recovery system and gas-to-energy generation plant was being operated by Pacific Lighting on the "Santa Clara" portion of the landfill (See attached site map) (Slides 40, 41).	C
17689	Processing Area.	The gas-to-electricity operation run by Pacific Lighting was confined to a specified, clearly identifiable area (See attached site map) (Slides 40, 41).	C
17690	Storage of Salvage.	I did not observe salvage being stored at the site.	N
17691	Removal.	I did not observe salvage being stored at the site.	N
17692	Non-Salvageable Items.	I did not observe the salvage of items considered non-salvagable by this CAC Section 17692.	C
		DISPOSAL SITE CONTROLS	
17701	Nuisance Control.	I did not observe a condition that was causing a public nuisance.	C
17702	Animal Feeding.	I did not observe animals planned for human consumption feeding on waste.	C
17703	Fire Control.	I did not observe a fire hazard at the site. Fire extinguishers were maintained on operating equipment and the site maintained several large storage tanks of water for firefighting purposes.	C

Inspector: Jack W. Miller

CAC	SECTION	OBSERVATIONS	RESULT
17704	Leachate Control.	Surface Water	
		I observed indications that a surface leachate problem may exist at the "Santa Clara" portion of the site. Almost every concrete drain observed in this area was stained orange by surface drainage water (Slides 66, 67, 68, 69, 75, 81). Runoff in the drainage ditch servicing the southwest corner of the golf course near the Raddison Hotel was discolored indicating possible contamination with leachate (Slides 89, 92, 93, 95, 96, 97). Carole Kawamoto of the Los Angeles Regional Water Quality Control Board (RWQCB) stated in a telephone conversation on 1/15/87 that she was going to require the operator to test surface runoff from the golf for leachate.	I
		Groundwater	
		The site has 8 operational groundwater quality monitoring wells and reports monitoring results to the L.A. RWQCB on a quarterly basis. Carole Kawamoto of the L.A. RWQCB stated in a telephone conversation on 1/6/87 that a preliminary review of groundwater quality monitoring reports from December, 1985 to December, 1986 indicated a decline in groundwater quality under the "Santa Clara" portion of the site. Ms. Kawamoto stated that the problem was probably due to methane gas being in contact with groundwater.	
		The LEA has instructed the operator to test surface drainage at Santa Clara for possible contamination by leachate. The L.A. RWQCB is continuing its investigation whether methane gas at Santa Clara is having a detrimental effect on groundwater under the site. Site compliance with CAC Section 17704 will remain indeterminate pending the outcome of the these investigations.	

Inspector: Jack W. Miller

CAC	SECTION	OBSERVATIONS	RESULT
17705	Gas Control.	The LEA has expressed concern that a gas monitoring and control problem exists at the site. On 4/23/85, 9/23/85, and 1/17/46 the LEA notified the operator that a comprehensive methane gas monitoring system was necessary around the perimeter of the "Coastal" portion of the landfill. On March 12, 1986, Mandeville and Associates tested for methane gas out to 75 feet beyond the east and south perimeters of "Coastal". These areas are zoned agricultural and are actively farmed. A convent is located within a 1,000 feet of the "Coastal" perimeter. Test results indicated methane gas concentrations of between 3% and 35 % in 5 of 21 bar holes tested. Apparently the farm fields adjacent to the west perimeter of "Coastal" were not tested. No methane gas monitoring or control system was in place around the "Coastal" portion of the site on the date of this inspection.* In a phone conversation on 1/7/87 Neil Moyer of the Ventura County Air Pollution Control District (805-654-2665) stated that both the "Santa Clara" and "Coastal" portions of the landfill exceed District limits for emissions of methane gas to air.** In a telephone conversation on 1/6/87, Carole Kawamoto of the Los Angeles RWQCB (805 654-2434) stated that groundwater quality monitoring results from December, 1985 to December, 1986 indicated that methane gas from the "Santa Clara" portion of the landfill may be having a detrimental effect on local groundwater. Ms. Kawamoto also indicated that a propensity by operators to overwater the golf course now covering the fill area may be contributing to methane gas production and therefore groundwater quality problems. Site Waste Discharge Requirements (L.A. RWQCB Order No. 82-53, 8/9/82) require the operator to monitor the amount of	V

Inspector: Jack W. Miller

CAC	SECTION	OBSERVATIONS	RESULT
17705	Gas Control (Continued)	water applied to the golf course through a system of ground tensiometers and make necessary watering adjustments. Ms. Kawamoto stated that the system of tensiometers was in disrepair.*** In consideration of the above information, I conclude that there is a substantial methane gas monitoring and control problem ongoing at the site. Although numerous measures have been implemented or are plan to be implemented to mitigate this problem, the facility does not currently comply with CAC Section 17705 (Gas Control). Notes: * John Conaway, VRSD Solid Waste Manager, stated that a gas monitoring systems was scheduled to be installed along the east, south, and west perimeters of the "Coastal" portion of the landfill in the near future. Results from the monitoring program would be used to determine what, if any gas migration control measures would be necessary. A gas recovery system and perimeter gas migration barrier were proposed for the "Coastal" portion of the site in a draft closure plan submitted to the Local Enforcement Agency on 1/9/86. However, the LEA returned the plan for being inadequate on 2/10/86. ** Mr. Moyer stated that problems at the "Santa Clara" portion of the landfill may be mitigated when Pacific Lighting hooks up a 3rd gas-to-electricity generator. However, Pacific Lighting has yet to receive approval for the 3rd generator. Plans to construct a gas collection system at the "Coastal" portion of the fill may mitigate ongoing methane gas control problems in this area.	

Inspector: Jack W. Miller

CAC	SECTION	OBSERVATIONS	RESULT
17705	Gas Control *** (Continued)	A 7,400 foot long gas migration barrier 25 feet deep has recently been constructed along the south perimeter of the "Santa Clara" portion of the landfill (See attached site map). A program to monitor the effectiveness of the barrier had yet to be initiated. However, operators of the Raddison Hotel which is adjacent to the southeast corner of the "Santa Clara" portion of the fill, were initiating their own testing program. I observed a methane gas monitoring and warning system in the basement of the golf course club house (See attached site map). There was also a methane gas detection and warning system in the Pacific Lighting gas-to-electric generation building (See attached sit map).	
17706	Dust Control.	Dust is controlled with a water tanker. I did not observe a dust control problem.	C
17707	Vector and Bird Control.	No vectors were observed during the inspection. Large numbers of gulls were observed at the working area but were kept off the garbage by use of cracker shells (Slides 5, 8, 38).	C
17708	Drainage and Erosion Control.	Lateral runoff from the west face of the completed area at the "Coastal" portion of the site drained onto the active working face (See attached site map) (Slides 13, 14, 15, 18, 21). Considerable rill erosion was observed on the west face of the "Coastal" portion of the site (Slides 43, 44, 45, 46). Mark Baily, Site Supervisor, stated that this area has 12 inches of intermediate cover and will eventually receive final cover. A sprinkler system has been installed on this slope in hopes of mitigating erosion with grass until the final cover is applied.	V

Inspector: Jack W. Miller

CAC	SECTION	OBSERVATIONS	RESULT
17709	Contact with Water.	No waste was observed in contact with water. Note: See Section 17708 (Drainage and Erosion Control).	C
17710	Grading of Fill Surfaces.	Numerous areas of ponding were observed on both the "Santa Clara" and "Coastal" portions of the site (Slides 15, 30, 31, 34, 35, 36, 37, 38, 39, 63, 74, 83, 85, 86, 100). Ponding was also observed around the gas-to-electricity generating building (Slides 40, 41). Marshy areas were observed at the head of several drains on the golf course (Slides 76, 77, 81, 82, 84). Ponding was also observed in the drain at the southwest corner of the "Santa Clara" portion of the site (Slides 89, 92, 93, 94, 95, 96, 97). Work was ongoing to correct an obvious ponding problem in the perimeter drain around the "Coastal" portion of the site (Slides 47, 49, 50, 51).	V
17711	Litter Control.	Mark Baily, Site Supervisor, stated that contract labor picked up site litter 1-2 times a week. Although I observed some litter on site (Slides 54, 55, 56), it did not constitute a major problem.	C
17712	Noise Control.	I did not detect a noise control problem during the inspection. The Local Enforcement Agency had no record of recent noise complaints regarding the site.	C
17713	Odor Control.	I did not observe any noxious or unpleasant odors drifting off site.	C
17714	Traffic Control.	Site traffic patterns were not observed to jeopardize public safety. Vehicles were not seen stacking onto public streets.	C
17715	Ponded Liquid.	No liquids were observed to be ponded at the site.	C

Inspector: Jack W. Miller

CAC	SECTION	OBSERVATIONS	RESULT
		DISPOSAL SITE EQUIPMENT.	
17726	General.	The site employs, four bulldozers, two compactors, one grader, one water tanker, two scrapers and two front end loaders. Preventative maintenance and general repairs were conducted on site. I did not observe conditions that would indicate a failure to employ and maintain equipment of sufficient numbers, type, or capacity to meet the criteria outlined in Section 17726.	C
17727	Standby Equipment.	Standby equipment was available from the Ventura Regional Sanitation District equipment pool.	C
		DISPOSAL SITE MAINTENANCE.	
17731	General.	There were not three or more maintenance related violations.	C
17732	Operating Site Maintenance.	I did not observe any deteriorated or defective conditions that would indicate site facilities were not maintained on a regular basis. The perimeter drainage system at the "Coastal" portion of the site was in the process of being up graded (Slides 47, 48).	C
17733	Inspection on Completion.	This section only applies to closed sites. Note: The "Santa Clara" portion of the site has yet to be officially closed.	N
17734	Completed Site Maintenance.	This Section only applies to closed sites. Note: The "Santa Clara" portion of the landfill has yet to be officially closed.	N

Inspector: Jack W. Miller

CAC	SECTION	OBSERVATIONS	RESULT
17735	Recording.	The operation of this site predates the implementation of this standard.	N
		DISPOSAL SITE SPECIAL WASTES.	
17741	Burning Wastes.	Space is maintained at the unloading area to separate, spread, and extinguish any incoming wastes that are burning or smoldering. No such wastes were observed during the inspection.	C
17742	Hazardous Wastes.	The site is not permitted to accept hazardous wastes. Signs telling users that hazardous wastes were not accepted were posted at the gatehouse (Slides 2, 3,). I did not observe any hazardous wastes being deposited at the site.	C
17743	Liquid Wastes.	Pacific Lighting was currently permitted to dispose liquid condensate from their methane gas collection operation in the landfill. Note: On 1/22/87, the L.A. Regional Water Quality Control Board considered issuing Pacific Lighting an order to cease and desist the disposal of gas collection condensates at the landfill. A decision on this matter was postponed until the Board's April, 1987 meeting.	C
17744	Dead Animals.	The site is prohibited from accepting large dead animals. None were observed being disposed during the inspection.	C
		DISPOSAL SITE REPORTS AND REVIEWS.	
17751	Periodic Site Review.	The site's current Solid Waste Facility Permit was issued on 8/11/78. On July 22, 1982, a closure plan was submitted to the LEA for the "Santa Clara" portion of the site. On January 9, 1986, a draft closure plan for the	C

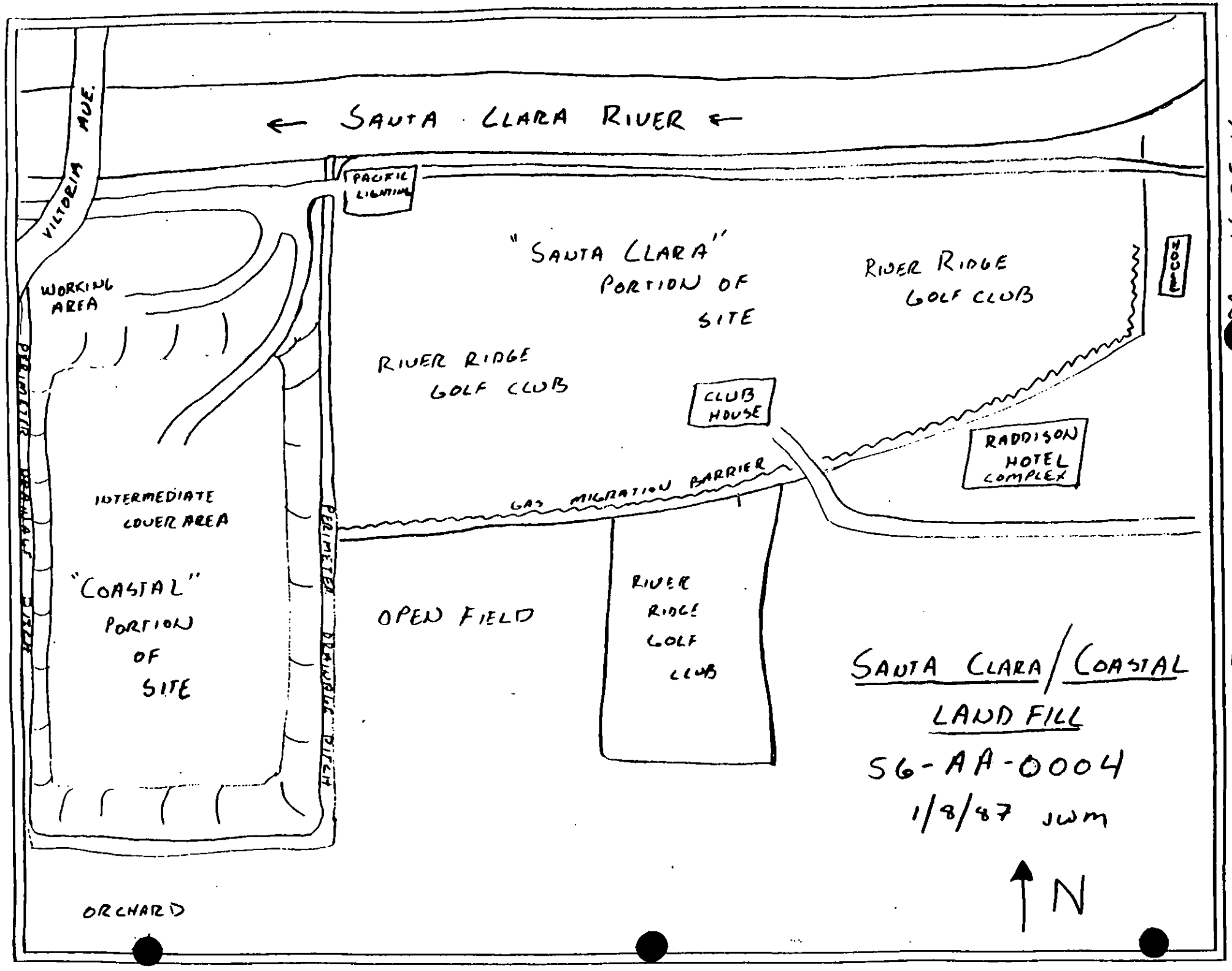
Inspector: Jack W. Miller

CAC	SECTION	OBSERVATIONS	RESULT
17751	Periodic Site Review (Cont.)	"Coastal" portion of the site was submitted to the LEA.	

NOTES

I had on-site conversations with John Conaway, VRSD Solid Waste Manager, Mark Baily, Site Supervisor, and Richard Sweet, Ventura County Sanitarian (LEA). Carole Kawamoto of the L.A. Regional Water Quality Control Board accompanied me on most of my inspection.

Inspector: Jack W. Miller


SANTA CLARA RIVER
VICTORIA AVE.
PACIFIC LIGHTING
"SANTA CLARA" PORTION OF SITE
RIVER RIDGE GOLF CLUB
RIVER RIDGE GOLF CLUB
EMCON
WORKING AREA
CLUB HOUSE
RADDISON HOTEL COMPLEX
PERIMETER DRAINAGE DITCH
GAS MIGRATION BARRIER
INTERMEDIATE COVER AREA
"COASTAL" PORTION OF SITE
OPEN FIELD
RIVER RIDGE GOLF CLUB
SANTA CLARA/COASTAL LAND FILL
56-AA-0004
1/8/87 JWM
N
ORCHARD

SWIS-65 (REV. 1/85)

NOTICE OF INSPECTION
DISPOSAL SITE

LOCAL ENFORCEMENT AGENCY: _____

FACILITY FILE NUMBER / COUNTY / LEA	PROGRAM CODE	INSPECTION DATE (1011) MM DD YY	T-OUT / T-IN	TOTAL TIME (DECIMAL HOURS) (1031)
56	[redacted]	1/8/87		3.5

FACILITY NAME: SANTA CLARA / COASTAL LANDFILL

FACILITY LOCATION: 4105 W. GONZALES Rd., OXNARD, CA

INSPECTOR: J. MILLER

LPEO PRESENT:

RECEIVED BY:

Operator _____

Owner _____

Comments: See attached Weekly Inspection Report.

	*V	C
(3011) RECORDS		☒
☐ ACCURATE WEIGHT/VOLUME RECORDS MAINTAINED 17636		
☐ ADEQUATE SUBSURFACE RECORDS MAINTAINED 17637		
☐ LOG OF SPECIAL OCCURRENCES MAINTAINED 17638		
☐ RECORDS AVAILABLE FOR INSPECTION 17639		
(3021) PERSONNEL		☒
☐ ADEQUATE NUMBER OF QUALIFIED PERSONNEL AVAILABLE 17646		
☐ PERSONNEL ADEQUATELY TRAINED 17647		
☐ ADEQUATE SUPERVISION PROVIDED 17648		
☐ SITE ATTENDANT AVAILABLE FULL-TIME OR AS DETERMINED BY LEA 17649		
(3031) SIGNS		☒
☐ IDENTIFICATION SIGNS AT EACH POINT OF ACCESS 17656		
☐ ENTRY SIGN STATES FEES, HOURS OF OPERATION, WASTES ACCEPTED/NOT ACCEPTED 17657		
☐ NON-HAZARDOUS UNATTENDED SITES HAVE SIGN WARNING USERS OF UNAVAILABILITY OF COMMUNICATION FACILITIES 17659		
(3041) SECURITY		☒
☐ ADEQUATE PERIMETER SECURITY, HAZARDOUS AREAS FENCED AND IDENTIFIED 17658		
(3051) ROADS		☒
☐ ACCESS ROADS HAVE SMOOTH SURFACE, MINIMIZE DUST AND TRACKING OF MUD, AND ALLOW ALL-WEATHER ACCESS 17659		
☐ INTERNAL ROADS IN SAFE CONDITION, PROVIDE ACCESS DURING INCLEMENT WEATHER, AND ARE PROVIDED WITH DIRECTIONS 17660		
(3071) SANITATION		☒
☐ ADEQUATE SANITARY FACILITIES AVAILABLE 17666		
☐ SAFE ADEQUATE DRINKING WATER AVAILABLE 17667		
(3081) COMMUNICATIONS		☒
☐ COMMUNICATION FACILITIES AVAILABLE WHERE HAZARDOUS WASTES ARE ACCEPTED 17669		
(3091) LIGHTING		☒
☐ LIGHTING ADEQUATE 17668		
(3101) SAFETY		☒
☐ SAFETY EQUIPMENT IN USE AND BEING WORN 17670		

	V	C
(3111) CONFINED UNLOADING		☒
☐ UNLOADING ADEQUATELY CONFINED 17676		
(3141) SPREADING/COMPACTING		☒
☐ SPREADING AND COMPACTION IN TWO-FOOT LAYERS 17677		
(3151) SLOPES/CUTS/GRADING	☒	
☐ WORKING FACE SLOPES ALLOW EFFECTIVE COMPACTION. DEPTH OF CUTS AND SLOPES OF TRENCH SIDES AS APPROVED BY LEA 17678		
☐ FINAL SLOPES HAVE NEAT APPEARANCE AND ARE 1-3/4 : 1 OR FLATTER 17679		
☒ GRADING OF FILL SURFACES ADEQUATE 17710		
(3161) COVER	☒	
☐ STOCKPILING OF COVER DOES NOT INTERFERE WITH OPERATIONS 17680		
☐ SUITABLE QUALITY AND SUPPLY OF COVER MATERIAL AVAILABLE 17681		
☒ COVER PROVIDED AT REQUIRED DEPTH AND FREQUENCY 17682		
☒ INTERMEDIATE COVER PROVIDED AT REQUIRED DEPTH AND FREQUENCY 17684		
☐ FINAL COVER PROVIDED AS REQUIRED 17683		
(3171) SALVAGING/PROCESSING N/A		
☐ SCAVENGING PROHIBITED 17686		
☐ SALVAGING DOES NOT INTERFERE WITH OPERATIONS 17687		
☐ VOLUME REDUCTION AND ENERGY RECOVERY DO NOT INTERFERE WITH OPERATIONS OR CREATE HEALTH, SAFETY OR ENVIRONMENTAL PROBLEMS 17688		
☐ SALVAGING AND VOLUME REDUCTION CONFINED TO CLEARLY IDENTIFIED AREAS 17689		
☐ SALVAGE STORAGE LOCATION OK, VOLUME AS APPROVED BY LEA, MINIMIZES FIRE, NUISANCE 17690		
☐ SALVAGE STORAGE TIME DOES NOT RESULT IN HEALTH OR FIRE PROBLEMS 17691		
☐ SALVAGED MATERIALS APPROVED BY LEA AND LOCAL HEALTH 17692		
(3181) NUISANCE		☒
☐ OPERATIONS DO NOT CREATE A PUBLIC NUISANCE 17701		
☐ FEEDING OF REFUSE TO ANIMALS FOR HUMAN CONSUMPTION PROHIBITED 17702		

	V	C
(3191) FIRE		☒
☐ FIRE CONTROL ADEQUATE 17703		
(3192) FIRE (P)		☒
☐ BURNING MATERIALS SPREAD AND EXTINGUISHED. LEA, SWMB NOTIFIED IMMEDIATELY OF FIRE NOT EXTINGUISHED IN 24 HOURS 17683		
(3201) LEACHATE		
☐ ADEQUATE STEPS TAKEN TO MONITOR, COLLECT, TREAT, AND DISPOSE OF LEACHATES 17704 IND.		
☐ NO WASTES IN DIRECT CONTACT WITH WATER EXCEPT AS APPROVED BY RWQCB 17705		
(3202) LEACHATE (P)		☒
☐ REFUSE COVERED WITH NEAT DAY'S REFUSE OR WITH SIX INCHES OF COMPACTED SOIL. TOTAL AREA OF EXPOSED REFUSE IS AS SPECIFIED FOR WET AND DRY SEASONS 17683		
(3211) GAS		
☐ GAS MONITORING AND CONTROL AS REQUIRED 17706		
(3221) DUST		☒
☐ DUST CONTROL ADEQUATE 17706		
(3231) VECTORS/BIRDS		☒
☐ VECTOR AND BIRD CONTROL ADEQUATE 17707		
☐ LIQUID PONDS MINIMIZE VECTOR PROPAGATION 17718		
(3232) VECTORS (P)		☒
☐ THRESHOLD VALUES FOR VECTOR POPULATIONS NOT EXCEEDED 17683		
(3241) DRAINAGE/EROSION	☒	
☒ DRAINAGE AND EROSION CONTROL ADEQUATE 17709		
(3251) LITTER		☒
☐ LITTER CONTROL ADEQUATE 17711		
(3252) LITTER (P)		☒
☐ LITTER NOT ALLOWED TO MIGRATE OFF-SITE 17683		
(3261) NOISE		☒
☐ NOISE CONTROL ADEQUATE 17712		
(3271) ODOR		☒
☐ ODOR CONTROL ADEQUATE 17713		
(3272) ODOR (P)		☒
☐ AMBIENT AIR AT OR BEYOND FACILITY BOUNDARY IS NOT ODOROUS 17683		

	V	C
(3281) TRAFFIC		☒
☐ TRAFFIC CONTROL ADEQUATE WITHIN SITE. TRAFFIC MINIMIZES INTERFERENCE, SAFETY PROBLEMS, AND STACKING ON PUBLIC ROADS 17714		
(3291) EQUIPMENT		☒
☐ EQUIPMENT ADEQUATE IN TYPE, CAPACITY, AND NUMBER, AND IS ADEQUATELY MAINTAINED 17716		
☐ STANDBY EQUIPMENT AVAILABLE TO COMPLY WITH SEC. 17682 AND OTHER SECTIONS 17717		
(3301) MAINTENANCE		☒
☐ EFFECTIVE MAINTENANCE PROCEDURES AND PROGRAMS DEVELOPED AND UTILIZED 17731		
☐ ADEQUATE MONITORING AND REPAIR OF DETERIORATED CONDITIONS 17732		
(3311) CLOSURE N/A		
☐ AFTER CLOSURE, IF LEACHATE, EXTENSIVE SURFACE CRACKING OR SETTLEMENT OCCURS, THE OWNER SHALL NOTIFY LEA AND SHALL MONITOR AND REPAIR SITE FOR A PERIOD OF 5 YEARS OR LONGER 17734		
☐ UPON SITE CLOSURE, DETAILED DESCRIPTION MUST BE FILED WITH THE LEA AND WITH THE COUNTY RECORDER 17735		
(3321) SPECIAL WASTES		☒
☐ BURNING WASTES IMMEDIATELY SPREAD AND EXTINGUISHED IN SAFE AREA 17741		
☐ SITE ACCEPTS ONLY APPROVED HAZARDOUS WASTES AND TAKES PRECAUTIONS TO ELIMINATE OR CONTROL HARMFUL DUSTS, FUMES, MISTS, VAPORS, OR GASES 17742		
☐ LIQUID WASTES APPROVED BY RWQCB, LOCAL HEALTH ENTITY AND LEA 17743		
☐ DEAD ANIMALS ALLOWED BY LOCAL REGULATIONS 17744		
(3331) OTHER	☒	
☐ 17616 RDSI		

N/A = NOT APPLIC

IND. = INDETERMINAT

*V = Violation
C = Compliance

DISTRIBUTION: WHITE — CWMB YELLOW — OPERATOR PINK — LEA

CALIFORNIA WASTE MANAGEMENT BOARD
Agenda Item #11-F
March 26 - 27, 1987

Item:

Consideration of notifying the operator of the Crazy Horse Sanitary Landfill (Monterey County) of the Board's intent to include that facility on the State List of Non-Complying Facilities as required by Government Code Section 66796.38.

Key Issues:

- Crazy Horse Sanitary Landfill has been evaluated for compliance with the State Minimum Standards including three on-site inspections by Board staff.

- Ongoing and/or repeated violations of the following Minimum Standards were documented:

  17705 - Gas Control
  17708 - Drainage and Erosion Control

- Staff recommends that the site operator be directed to establish a compliance schedule within 30 days. The Chief Executive Officer would be authorized to issue a 90 day notice of the Board's intent to place the site on the State List of Non-Complying Facilities if the adopted compliance schedule is not met.

Site Information:

Name:	Crazy Horse Sanitary Landfill
SWIS #:	27-AA-07
Facility Type:	Class III Sanitary Landfill.
Operational Status:	Open
Location:	Crazy Horse Canyon Road, Monterey County
Setting:	Three residences within 75 ft. of southern perimeter; native vegetation within 1,000 ft. of other borders.
Permitted Tonnage:	375 TPD, six days per week
In-Place Tonnage:	Approximately 3,564,000 tons.
Permitted Acreage:	125 acres
Facility Owner:	City of Salinas
Facility Operator:	Salinas Disposal Service, Inc.
Local Enforcement Agency:	Monterey County Health Depart.

Summary of Repeated Presley Violations:

CAC Section Date	1st Inspec. 5/21-22/86	2nd Inspec. 10/23/86	3rd Inspec. 1/13 & 16/87
17705 - Gas Control	Violation	Indeterminate	Violation
17708 - Drainage Erosion Control	Violation	Violation	Violation

Background:

The Crazy Horse Landfill is an existing 125 acre, Class III Landfill which receives an average of 438 tons of waste per day. Disposal operations began in the 1950's. A Solid Waste Facility Permit was issued on September 26, 1977. According to the most recent permit, September 8, 1983, the disposal site is to terminate operations in approximately 1999.

Types of waste received at this site include:

a) residential
b) commercial
c) industrial
d) triple-rinsed pesticide containers

The following actions are prohibited at the facility:

a) disposal of hazardous waste
b) scavenging
c) open burning
d) disposal of liquid wastes

The facility is owned by the City of Salinas and it is operated by the Salinas Disposal Service, Inc.

Land use surrounding the site includes three residences within 75 feet of the southern perimeter, and native vegetation within 1,000 feet of the north, east and west perimeters.

Related Issues:

Three residences on the landfill's southern border have found that their water wells are contaminated with toxic substances and it is alleged that the landfill is the source of the contamination.

One resident has settled out of court and has sold his property to the City of Salinas, who owns the site. The City of Salinas has received a Condemnation Finding and have filed a Writ of Immediate Possession on two remaining residences. It is expected that through due course of law, the remaining residences will be vacated by April 21, 1987.

This site has a Calderon Priority Ranking of #2. An application for new Waste Discharge Requirements (WDR) is required by the Regional Water Quality Control Board to address the local groundwater contamination problem and to implement Subchapter 15 requirements. The site owners have retained EMCON Associates to draft an action plan addressing off-site migration of toxic substances, and to help meet Calderon legislation and Subchapter 15 requirements. New waste discharge requirements (WDR) are expected to be approved at the March 13, 1987 RWQCB meeting.

Pacific Lighting and Energy Systems is currently operating a gas extraction system on site. The operation produces an average of 1.1 mega watts of energy each day. The energy producing system has been on-line since December 1986 and it replaces a flare gas control system used in the past. An EPA evaluation of the exhaust emission quality of the operation is tentatively scheduled for March 1987.

Past Compliance:

For the year between May 22, 1985 and May 22, 1986 two inspections were conducted by the Local Enforcement Agency (LEA). The following table summarizes the violations by the LEA during this time period:

17658 - Security	1
17710 - Grading of Fill Surfaces	1
17682 - Cover	1
17708 - Drainage and Erosion Control	1
17732 - Operating Site Maintenance	1
TOTAL	5

Recent Compliance:

During the California Waste Management Board evaluation period for Crazy Horse Sanitary Landfill (May 21, 1986 to January 16, 1987) there were nine Local Enforcement Agency (LEA) inspections, available for staff review. The most recent was on 12/10/86. One occurrence of the three following violations was cited during this time period: Section 17704 - Leachate Control; · Section 17682 - Cover; and Section 17711 - Litter Control.

A chronology of events occurring during the CWMB evaluation period is presented below.

May 21-22, 1986

The first of three inspections by the CWMB was conducted by Pamela Badger. Sections in violation were as follows:

17616 - RDSI
17627 - Ultimate Use of Site
17684 - Intermediate Cover
17705 - Gas Control
17708 - Drainage and Erosion Control

Sections with an indeterminate status were as follows:

17682 - Cover
17704 - Leachate

All other CAC sections were found to be either in compliance or not applicable.

May 23, 1986

A letter from the site operator to Board staff was received. The letter contained photographs documenting application of daily cover during the first Presley inspection (Attachment #2).

June 11, 1986

A reply to the May 23, 1986 letter from the Site Operator was sent from Board staff to the site operator indicating that Section 17682 - Cover - was found in compliance during the first Presley inspection (Attachment #1).

August 5, 1986

Results of the first inspection were transmitted to the operator and the LEA (Attachment #2). The cover letter described the nature of our evaluation program and the consequences of noncompliance.

October 2, 1986

A letter from the site owner to Board staff was received. The letter indicated that all violations had been, or were in the process of being, corrected (Attachment #3).

October 23, 1986

The second of the three inspections was conducted by Herbert Berton.

Sections in violation were as follows:

17658 - Site Security
17708 - Drainage and Erosion

Sections with an indeterminate status were as follows:

17704 - Leachate
17705 - Gas

All other CAC sections were found to be either in compliance or not applicable.

December 1, 1986

The results of the second CWMB inspection were transmitted to the operator and the LEA (Attachment #4). The cover letter again explained the nature of the evaluation program and the consequences of non-compliance.

January 13 and 16, 1987

The third Presley inspection was conducted by Martha Vazquez. Sections in violation were as follows:

17705 - Gas Control 17708 - Drainage and Erosion

All other CAC sections were found to be either in compliance or not applicable.

March 12, 1987

Results of the third inspection were transmitted to the operator and LEA (Attachment #5). The cover letter reiterated the nature of our evaluation program. It also informed the operator and the LEA of the staff's intent to have the Board consider placing the Crazy Horse Landfill on the State's List of Non-Complying Facilities at its March meeting unless corrective measures were taken.

Summary:

The Crazy Horse Landfill has been evaluated by the California Waste Management Board staff for compliance with State Minimum Standards. All pertinent information including data from three separate California Waste Management Board staff inspections has been reviewed. Continued violations for the following sections have been documented:

17705 - Gas Control 17708 - Drainage and Erosion

Board Options:

Option #1

Direct the operator to establish a schedule for bringing the site into compliance with State Minimum Standards.

Under this option, the operator must submit a compliance schedule to the Board within 30 days stating specific dates for initiating and completing the required actions outlined below. If an agreeable schedule is not received by the Board within 30 days, and/or if dates specified for implementing and completing the required actions are not met, this option authorizes the Chief Executive Officer to issue a 90-day notice of the Board's intent to place the site on the State List of Non-Complying Facilities.

Specified Actions:

17705 Gas Control

The operator shall either:

a. Submit a plan of the existing gas monitoring system and monitoring procedure to the Board staff and the LEA for review and concurrence. If any deficiencies are noted by Board staff or the LEA, a work plan will be submitted with specified timetables for making the required corrections.

b. Once the monitoring system and monitoring procedure are approved by the LEA and the Board staff, and if it is shown that the existing gas extraction system is not effective in controlling off-site gas migration, a work plan shall be submitted specifying dates for controlling the migration. Complete migration control shall be verified by monitoring data from a properly installed and operated gas monitoring system.

-OR-

The site operator shall submit an action plan and timetable delineating proposed measures to remove adjacent off site structures. The site owner has stated that after the adjacent properties are purchased by the City, the residences shall be removed or demolished. Elimination of the residences abolishes off site monitoring requirements unless new development takes place within 1,000 feet of site boundaries.

17708 Drainage and Erosion Control

Submit a plan stating measures that will be taken to detect and promptly correct drainage and erosion problems.

Option #2

Notify the operator of the Board's intent to place Crazy Horse Sanitary Landfill on the State List of Non-Complying Facilities unless the following action is taken within 90 days of the notice:

The operator must develop a compliance schedule that is mutually agreed upon by the Board and the Local Enforcement Agency for completion of the required actions outlined in Option #1. Failure to meet any deadline contained in the compliance schedule will result in a recommendation by staff that the Board place the site on the State List of Non-Complying Facilities. In no case will such a recommendation be made in less than 90 days. Verification of all deadlines will be made through additional staff inspections as necessary.

Option #3

No Action.

Notification:

The site operator and LEA have been invited to present to the Board at its March meeting any information relevant to the matter under consideration.

Recommendation:

Based on the information available to the staff at the time of the report, staff recommends that the Board implement Option #1.

Crazy Horse Sanitary Landfill

Attachments

#1 1st CWMB Inspection Report, June 21 - 26, 1986

#2 Operator's letter to staff verifying cover, May 23, 1986

#3 Staff's letter to operator acknowledging receipt of May 23, 1986 letter, June 11, 1986.

#4 Operator response to 1st CWMB Inspection Report, October 2, 1986

#5 2nd CWMB Inspection Report, October 23, 1986

#6 3rd CWMB Inspection Report, January 13 & 16, 1987

Working File

STATE OF CALIFORNIA

GEORGE DEUKMEJIAN, Governor

CALIFORNIA WASTE MANAGEMENT BOARD
1020 NINTH STREET, SUITE 300
SACRAMENTO, CA 95814

1st

AUG 05 1986

To: R.M. Rossi, President
Salinas Disposal Service
P.O. Box 3830
Salinas, CA 93907

Subject: Report of inspection: Crazy Horse Sanitary Landfill
27-AA-07

Government Code Section 66796.38 requires the California Waste Management Board (Board) to conduct inspections of solid waste facilities for the purpose of evaluating compliance with the State Standards for Solid Waste Handling and Disposal (Title 14. California Administrative Code, Division 7 Chapter 3, commencing with section 17200). Under this program, each facility will be inspected at least three separate times. As you are aware by now, staff has already conducted one of these inspections at the subject facility. The date of that inspection was May 21-22, 1986. A report resulting from the recent inspection is enclosed. If photographs are referred to in the inspection report, copies will be obtainable upon written request.

The goal of our inspection program is to verify compliance with each of the State Minimum Standards, not merely to find violation(s) of these standards. In order to achieve this we will, as I stated above, be inspecting each facility at least three times. This will provide the following advantages over the previous inspection techniques:

* The program will provide greater fairness to operators of facilities by reducing the possibility that one operator will be inspected under adverse conditions and another under favorable conditions.

* The program will allow for evaluation of conditions, which show seasonal variations such as effectiveness of leachate control systems, vectors, dust, etc.

* The program will provide a track record of compliance which will be used in evaluating standards for which a single violation may not be sufficient reason to place the facility on the State List of Non-Complying Facilities when the facility is generally in compliance with that standard, i.e., the daily cover standard.

Although we do not intend to provide advance notice of the inspection dates to operators, the Local Enforcement Agency (LEA) will be notified of those dates, and will be invited to accompany our staff on the inspection.

If, after three inspections, your facility continues to be operating in violation of one or more of the State Minimum Standards you will be notified of this finding by certified letter. A copy of that letter will be sent to the LEA. After 90 days or upon notification of correction of all violations(s), Board staff will reinspect the facility. If the facility is still in violation, staff will notify you and the LEA, by certified letter of staff's intent to recommend that the Board place the facility's name on the State List of Non-Complying Facilities at a regularly scheduled meeting of the Board. Should the Board place the facility on that list, State law (Government Code 66796.39) requires that the LEA develop a compliance schedule for correction of the violation(s). If compliance is not achieved within one year, Government Code section 66796.39 directs LEAs to revoke facility operating permits. If the facility is closed or abandoned, staff will recommend that the LEA issue a notice of violation and an order to correct the violations. That Notice and Order will also notify you or the owner of the facility that State law provides that "the unremedied condition of the facility is prima facie evidence of negligence, and in any action for damages against the owner of the property for injury caused by the unremedied condition, the burden of proving the injury was not caused by an unremedied condition shall be on the owner of the property".

If you have any questions regarding the program, please contact me at (916) 322-1769.

Sincerely,

John K. Bell, Manager
Monitoring Section

cc: Mary Dennis-Bannister

City of Salinas, Director of Public Works

mea

CALIFORNIA WASTE MANAGEMENT BOARD

DISPOSAL SITE
EVALUATION REPORT

Facility Name: Crazy Horse Sanitary Landfill **Facility ID No.:** 27-AA-07

Name of Inspector: Pamela Badger **Inspection Dates:** 5/21-22/86

Signature: P. Badger

CAC Section:	Observations:	Conclusions:
Disposal Site Information:		
17616 Report of Disposal Site Information	The site no longer has gas monitoring probes. They have been incorporated into the gas recovery system. Gas monitoring is required in the Report of Station Information (RDSI) and in the Permit.	Violation
Design Responsibility:		
17626 Design Responsibility	This is not a new facility.	N/A
17627 Ultimate Use	No ultimate use has been described in either the RDSI or the Permit.	Violation
17628 General Design Parameters	The design appeared to meet the criteria of Section 17628.	N/A
17629 Public Health Design Parameters	The design appeared to meet the criteria listed in 17629.	Comply
17636 Weight/Volume Records	Records were kept which were adequate for forecasting the rate of site filling and for planning purposes.	Comply
17637 Subsurface Records	Subsurface records were maintained by the operator.	Comply
17638 Special Occurrences	A log of special occurrences was maintained.	Comply

Section Manager [illegible]

Facility Name: Crazy Horse Sanitary Landfill **Facility ID No.:** 27-AA-07

Name of Inspector: Pamela Badger **Inspection Dates:** 5/21-22/86

Signature: P. Badger

CAC Section:	Observations:	Conclusions:
17639 Inspection of Records	Records were available during normal business hours.	Comply
Disposal Site Personnel:		
17646 Availability	No operation appeared to be restricted by a lack of personnel.	Comply
17647 Training	Training was of the on-the-job type. No activity appeared to be restricted by a lack of training.	Comply
17648 Supervision	There were supervisory personnel on site and supervision appeared adequate.	Comply
17649 Site Attendant	The site was attended during operating hours.	Comply
Disposal Site Improvements:		
17656 Identification Signs	Signs identified the site.	Comply
17657 Entry Signs	There was adequate signing at the entry.	Comply
17658 Site Security	I did not observe evidence of unauthorized access to the facility.	Comply
17659 Access Roads	Roads were smooth and allowed good access to the site. I did not see dust or tracking of material onto local streets.	Comply
17660 Internal Roads	Internal roads were smooth and allowed good access to the unloading areas. Roads were suitably signed.	Comply

Facility Name: Crazy Horse Sanitary Landfill **Facility ID No.:** 27-AA-07

Name of Inspector: Pamela Badger **Inspection Dates:** 5/21-22/86

Signature: P. Badger

CAC Section:	Observations:	Conclusions:
Disposal Site Health and Safety:		
17666 Sanitary Facilities	Sanitary facilities were available at on site offices.	Comply
17667 Water Supply	Water was supplied by the operator.	Comply
17668 Communications Facilities	There are phones on site. Phone #: (408) 663-2796.	Comply
17669 Lighting	I did not observe conditions which were likely to cause safety hazards due to inadequate lighting.	Comply
17670 Personnel Health And Safety	Supervisors had safety equipment and supplies that were available to employees. The LEA did not require that specific safety items be used.	Comply
Disposal Site Operations:		
17676 Confined Unloading	The unloading area was reasonably confined.	Comply
17677 Spreading and Compacting	Waste was adequately spread and compacted.	Comply
17678 Slopes and Cuts	The slope of the working face was of an angle that appeared to allow effective compaction by the type of vehicles used.	Comply
17679 Final Site Face	The final site face was of a slope not greater than 1 3/4 : 1 and had a neat finished appearance.	Comply

Facility Name: Crazy Horse Sanitary Landfill **Facility ID No.:** 27-AA-07

Name of Inspector: Pamela Badger **Inspection Dates:** 5/21-22/86

Signature: P. Badger

CAC Section:	Observations:	Conclusions:
17680 Stockpiling	Stockpiling did not interfere with other site activities.	Comply
17681 Availability of Cover	The supply of cover appeared adequate for the time being. Subsequent inspectors should continue to evaluate this section carefully, as the site manager, Jim Lucero, attributed part of their occaisional cover problems to a potential future lack of cover.	Comply
17682 Cover	Subsequent inspectors should evaluate this section carefully, as I was not able to see for myself that daily cover was applied. The amount of time taken to cover this site may have been slightly greater than one day and required photogrpahic verification provided by the operator. (See slides #2.1 - 2.3 and operator pictures #1-3).	Indeterminate
17683 Performance Standards	The site uses daily cover rather than performance standards.	N/A
17684 Intermediate Cover	There was a considerable amount of exposed waste in the intermediate cover areas. Part of the eastern area was in process of having the 12 inch intermediate cover applied. Subsequent inspectors should check to see the intermediate cover area has been properly covered.	Violation
17685 Final Cover	There were no final cover areas on this landfill.	Comply
17686 Scavenging	I did not observe scavenging.	Comply

Facility Name: Crazy Horse Sanitary Landfill **Facility ID No.:** 27-AA-07

Name of Inspector: Pamela Badger **Inspection Dates:** 5/21-22/86

Signature: P. Badger

CAC Section:	Observations:	Conclusions:
17687 Salvaging Permitted	Salvaging is permitted and occurred in a clearly defined, organized and controlled manner.	Comply
17688 Volume Reduction and Energy Recovery	Volume Reduction and Energy Recovery were not observed.	Comply
17689 Processing Area	Salvaging occurred in a clearly defined area.	Comply
17690 Storage of Salvage	Storage of salvage occurred in clearly defined areas and was not likely to cause a safety hazard or public nuisance.	Comply
17691 Removal	Salvage storage time did not seem excessive or likely to cause a safety or fire hazard or become a public nuisance.	Comply
17692 Non-Salvageable Items	I did not observe non-salvageable items salvaged.	Comply
Disposal Site Controls:		
17701 Nuisance Control	The operation did not appear to be likely to cause a public nuisance.	Comply
17702 Animal Feeding	I did not observe animals feeding on waste.	Comply
17703 Fire Control	I did not observe any fires, or see evidence of recent fires. Fire control would be effected through the use of dozers, fire extinguishers, fire breaks, and a water truck.	Comply

Facility Name: Crazy Horse Sanitary Landfill **Facility ID No.:** 27-AA-07

Name of Inspector: Pamela Badger **Inspection Dates:** 5/21-22/86

Signature: P. Badger

CAC Section:	Observations:	Conclusions:
17704 Leachate Control	This site had a functioning leachate control system. The site manager, Jim Lucero, monitors for leachate on a regular basis. However, the site is currently being sued by three neighboring homeowners who claim their wells have been contaminated by the landfill. They currently cannot use their water. This section shall be indeterminate pending the outcome of the lawsuit and pending determination of compliance to Subchapter 15 by the Regional Water Quality Control Board. The RWQCB is also waiting for litigation outcome to determine the source of contamination.	Indeterminate
17705 Gas Control	The site is in violation because it no longer has an active gas monitoring system as required to its permit. The site will be referred to the California Waste Management Board's Standards and Technologies Program for further study. I tested for landfill gas migration on the southern perimeter across from each of the three houses mentioned in Section 17704. (I found a reading 0% as methane across from the westernmost house, 4 % near the center house, and 3% near the easternmost house.)	Violation
17706 Dust Control	A water truck was actively controlling dust. The minor amount of dust observed was not likely to cause a public nuisance.	Comply
17707 Vector and Bird Control	I did not observe vectors on site. The small number of birds observed were not likely to cause a hazard to aviation or a public nuisance.	Comply

Facility Name: Crazy Horse Sanitary Landfill **Facility ID No.:** 27-AA-07

Name of Inspector: Pamela Badger **Inspection Dates:** 5/21-22/86

Signature: P. Badger

CAC Section:	Observations:	Conclusions:
17708 Drainage and Erosion Control	There were places on the southwestern section and on the northern edge of the fill where erosion had exposed waste. There was a large eroded area at the center of the hillside. The drainage channel on the northern perimeter had silted up, as had the drain on the southern perimeter. (See slides #2.15, 2.17, 2.20 and 2.21.) (See notes section at the end of this report).	Violation
17709 Contact with Water	I did not observe waste in contact with water.	Comply
17710 Grading of Fill Surfaces	Grading appeared adequate to account for settlement and promote lateral runoff.	Comply
17711 Litter Control	I did not observe accumulations of litter which were likely to cause a public nuisance.	Comply
17712 Noise Control	Noise levels did not seem likely to cause a public nuisance.	Comply
17713 Odor Control	I did not detect odors off site and did not detect odors on site that were likely to cause a public nuisance.	Comply
17714 Traffic Control	Traffic flow did not appear likely to cause a public safety hazard and I did not observe vehicles stacking onto public roads.	Comply

Facility Name: Crazy Horse Sanitary Landfill **Facility ID No.:** 27-AA-07

Name of Inspector: Pamela Badger **Inspection Dates:** 5/21-22/86

Signature: P. Badger

CAC Section:	Observations:	Conclusions:
17715 Ponded Liquid	The runoff collection pond did not have any evidence of vector propagation.	Comply
Disposal Site Equipment:		
17726 General	The numbers and types of equipment on site were consistant with requirements listed in the RDSI.	Comply
17727 Standby Equipment	Adequate standby equipment was available on site.	Comply
Disposal Site Maintenance:		
17731 General	Equipment and facility maintenance programs appeared adequate.	Comply
17732 Operating Site Maintenance	There were fewer than three maintenance related violations on this site. The site therefore complies with Section 17732.	Comply
17733 Insp. on Completion	The site has not closed.	N/A
17734 Completed Site Maintenance	The site has not closed.	N/A
17735 Recording	This is a grandfathered site.	Comply
Disposal Site Special Wastes:		
17741 Burning Wastes	I did not observe burning wastes. There was space available for spreading and extinguishing burning waste.	Comply
17742 Hazardous Wastes	I did not observe hazardous wastes received.	Comply

Facility Name: Crazy Horse Sanitary Landfill **Facility ID No.:** 27-AA-07

Name of Inspector: Pamela Badger **Inspection Dates:** 5/21-22/86

Signature: P Badger

CAC Section:	Observations:	Conclusions:
17743 Liquid Wastes	I did not observe any liquid waste disposal.	Comply
17744 Dead Animals	I did not observe dead animals being received.	Comply
Disposal Site Reports and Reviews:		
17751 Periodic Site Review	The current permit was issued in 1983. A five year review accompanied the permit process.	Comply

Notes:

I was accompanied by Mary Anne Dennis-Bannister during parts of this inspection. The weather was fair and mild.

The perimeter ditch is slated to be lined with asphalt, which could alleviate further drainage and erosion problems. Subsequent inspectors should check on the progress of this project.

SWIS-40 (REV. 1/85)

NOTICE OF INSPECTION
DISPOSAL SITE

LOCAL ENFORCEMENT AGENCY: [illegible] County Environmental Health

FACILITY PER NUMBER	INSPECTION DATE	T-OUT	TOTAL TIME
[illegible]	[illegible] 5 [illegible]	T-IN	[illegible] 4 [illegible]

FACILITY NAME: Crazy Horse Sanitary Landfill

FACILITY LOCATION: [illegible] Crazy Horse Canyon Rd.

INSPECTOR: R Badger

ALSO PRESENT: M Williams-Bannister

RECEIVED BY:
Operator _____
Owner _____

Comments: The RDSI does not describe the gas monitoring, pure elimination, or ultimate use as stated in the RDSI or Permit. Exposed waste in inadequate cover areas. Daily cover applied, but may not be fully applied daily. I was unable to get copies of leachate monitoring reports. Site is required to have gas monitoring by permit. Erosion has exposed some waste.

	*V	C
(3011) RECORDS		☒
☐ ACCURATE WEIGHT/VOLUME RECORDS MAINTAINED 17636		
☐ ADEQUATE SUBSURFACE RECORDS MAINTAINED 17637		
☐ LOG OF SPECIAL OCCURRENCES MAINTAINED 17638		
☐ RECORDS AVAILABLE FOR INSPECTION 17639		
(3021) PERSONNEL		☒
☐ ADEQUATE NUMBER OF QUALIFIED PERSONNEL AVAILABLE 17646		
☐ PERSONNEL ADEQUATELY TRAINED 17647		
☐ ADEQUATE SUPERVISION PROVIDED 17648		
☐ SITE ATTENDANT AVAILABLE FULL-TIME OR AS DETERMINED BY LEA 17649		
(3031) SIGNS		☒
☐ IDENTIFICATION SIGNS AT EACH POINT OF ACCESS 17656		
☐ ENTRY SIGN STATES FEES, HOURS OF OPERATION, WASTES ACCEPTED/NOT ACCEPTED 17657		
☐ NON-HAZARDOUS UNATTENDED SITES HAVE SIGN WARNING USERS OF UNAVAILABILITY OF COMMUNICATION FACILITIES 17658		
(3041) SECURITY		☒
☐ ADEQUATE PERIMETER SECURITY, HAZARDOUS AREAS FENCED AND IDENTIFIED 17666		
(3051) ROADS		☒
☐ ACCESS ROADS HAVE SMOOTH SURFACE, MINIMIZE DUST AND TRACKING OF MUD, AND ALLOW ALL-WEATHER ACCESS 17668		
☐ INTERNAL ROADS IN SAFE CONDITION, PROVIDE ACCESS DURING INCLEMENT WEATHER, AND ARE PROVIDED WITH DIRECTIONS 17669		
(3071) SANITATION		☒
☐ ADEQUATE SANITARY FACILITIES AVAILABLE 17686		
☐ SAFE ADEQUATE DRINKING WATER AVAILABLE 17687		
(3081) COMMUNICATIONS		☒
☐ COMMUNICATION FACILITIES AVAILABLE WHERE HAZARDOUS WASTES ARE ACCEPTED 17688		
(3091) LIGHTING		☒
☐ LIGHTING ADEQUATE 17689		
(3101) SAFETY		☒
☐ SAFETY EQUIPMENT IN USE AND BEING WORN 17670		

	V	C
(3111) CONFINED UNLOADING		☒
☐ UNLOADING ADEQUATELY CONFINED 17676		
(3141) SPREADING/COMPACTING		☒
☐ SPREADING AND COMPACTION IN TWO-FOOT LAYERS 17677		
(3181) SLOPES/CUTS/GRADING		☒
☐ WORKING FACE SLOPES ALLOW EFFECTIVE COMPACTION, DEPTH OF CUTS AND SLOPES OF TRENCH SIDES AS APPROVED BY LEA 17678		
☐ FINAL SLOPES HAVE NEAT APPEARANCE AND ARE 1-3/4 : 1 OR FLATTER 17679		
☐ GRADING OF FILL SURFACES ADEQUATE 17719		
(3161) COVER	☒	
☐ STOCKPILING OF COVER DOES NOT INTERFERE WITH OPERATIONS 17680		
☐ SUITABLE QUALITY AND SUPPLY OF COVER MATERIAL AVAILABLE 17681		
☒ COVER PROVIDED AT REQUIRED DEPTH AND FREQUENCY 17682		
☒ INTERMEDIATE COVER PROVIDED AT REQUIRED DEPTH AND FREQUENCY 17684		
☐ FINAL COVER PROVIDED AS REQUIRED 17685		
(3171) SALVAGING/PROCESSING		☒
☐ SCAVENGING PROHIBITED 17684		
☐ SALVAGING DOES NOT INTERFERE WITH OPERATIONS 17687		
☐ VOLUME REDUCTION AND ENERGY RECOVERY DO NOT INTERFERE WITH OPERATIONS OR CREATE HEALTH, SAFETY OR ENVIRONMENTAL PROBLEMS 17688		
☐ SALVAGING AND VOLUME REDUCTION CONFINED TO CLEARLY IDENTIFIED AREAS 17689		
☐ SALVAGE STORAGE LOCATION OR VOLUME AS APPROVED BY LEA, MINIMIZES FIRE, NUISANCE 17690		
☐ SALVAGE STORAGE TIME DOES NOT RESULT IN HEALTH OR FIRE PROBLEMS 17691		
☐ SALVAGED MATERIALS APPROVED BY LEA AND LOCAL HEALTH 17692		
(3181) NUISANCE		☒
☐ OPERATIONS DO NOT CREATE A PUBLIC NUISANCE 17701		
☐ FEEDING OF REFUSE TO ANIMALS FOR HUMAN CONSUMPTION PROHIBITED 17702		

	V	C
(3191) FIRE		☒
☐ FIRE CONTROL ADEQUATE 17703		
(3192) FIRE (P)		
☐ BURNING MATERIALS SPREAD AND EXTINGUISHED, LEA, SWMB NOTIFIED IMMEDIATELY OF FIRE NOT EXTINGUISHED IN 24 HOURS 17683		
(3201) LEACHATE		
☒ ADEQUATE STEPS TAKEN TO MONITOR, COLLECT, TREAT, AND DISPOSE OF LEACHATES 17704		
☐ NO WASTES IN DIRECT CONTACT WITH WATER EXCEPT AS APPROVED BY RWQCB 17705		
(3202) LEACHATE (P)		
☐ REFUSE COVERED WITH NEXT DAY'S REFUSE OR WITH SIX INCHES OF COMPACTED SOIL, TOTAL AREA OF EXPOSED REFUSE IS AS SPECIFIED FOR WET AND DRY SEASONS 17683		
(3211) GAS	☒	
☒ GAS MONITORING AND CONTROL AS REQUIRED 17708		
(3221) DUST		☒
☐ DUST CONTROL ADEQUATE 17709		
(3231) VECTORS/BIRDS		☒
☐ VECTOR AND BIRD CONTROL ADEQUATE 17707		
☐ LIQUID PONDS MINIMIZE VECTOR PROPAGATION 17710		
(3232) VECTORS (P)		
☐ THRESHOLD VALUES FOR VECTOR POPULATIONS NOT EXCEEDED 17683		
(3241) DRAINAGE/EROSION	☒	
☒ DRAINAGE AND EROSION CONTROL ADEQUATE 17706		
(3251) LITTER		☒
☐ LITTER CONTROL ADEQUATE 17711		
(3252) LITTER (P)		
☐ LITTER NOT ALLOWED TO MIGRATE OFF-SITE 17683		
(3261) NOISE		☒
☐ NOISE CONTROL ADEQUATE 17712		
(3271) ODOR		☒
☐ ODOR CONTROL ADEQUATE 17713		
(3272) ODOR (P)		
☐ AMBIENT AIR AT OR BEYOND FACILITY BOUNDARY IS NOT OBNOXIOUS 17683		

	V	C
(3281) TRAFFIC		☒
☐ TRAFFIC CONTROL ADEQUATE WITHIN SITE. TRAFFIC MINIMIZES INTERFERENCE, SAFETY PROBLEMS, AND STACKING ON PUBLIC ROADS 17714		
(3291) EQUIPMENT		☒
☐ EQUIPMENT ADEQUATE IN TYPE, CAPACITY, AND NUMBER, AND IS ADEQUATELY MAINTAINED 17726		
☐ STANDBY EQUIPMENT AVAILABLE TO COMPLY WITH SEC. 17682 AND OTHER SECTIONS 17727		
(3301) MAINTENANCE		☒
☐ EFFECTIVE MAINTENANCE PROCEDURES AND PROGRAMS DEVELOPED AND UTILIZED 17731		
☐ ADEQUATE MONITORING AND REPAIR OF DETERIORATED CONDITIONS 17732		
(3311) CLOSURE		☒
☐ AFTER CLOSURE, IF LEACHATE, EXTENSIVE SURFACE CRACKING OR SETTLEMENT OCCURS, THE OWNER SHALL NOTIFY LEA AND SHALL MONITOR AND REPAIR SITE FOR A PERIOD OF 5 YEARS OR LONGER 17734		
☐ UPON SITE CLOSURE, DETAILED DESCRIPTION MUST BE FILED WITH THE LEA AND WITH THE COUNTY RECORDER 17738		
(3321) SPECIAL WASTES		☒
☐ BURNING WASTES IMMEDIATELY SPREAD AND EXTINGUISHED IN SAFE AREA 17741		
☐ SITE ACCEPTS ONLY APPROVED HAZARDOUS WASTES AND TAKES PRECAUTIONS TO ELIMINATE OR CONTROL HARMFUL DUSTS, FUMES, MISTS, VAPORS, OR GASES 17742		
☐ LIQUID WASTES APPROVED BY RWQCB, LOCAL HEALTH ENTITY AND LEA 17743		
☐ DEAD ANIMALS ALLOWED BY LOCAL REGULATIONS 17744		
(3331) OTHER	☒	
☒ 17616 - RDSI - [illegible]		
17627 - Ultimate Use		

*V = Violation
C = Compliance

-2

GrayLine SNAP-A-WAY FORM

Speed Letter

To ATTN: PAMELA BADGER.
CALIFORNIA WASTE MGMT. BOARD
ENFORCEMENT DIV.
1020 - 9TH ST. - STE. #300
SACRAMENTO, CA 95814

From
Salinas Disposal Service
P.O. Box 3830
Salinas, CA 93912

Subject CRAZY HORSE CYN. LANDFILL

MESSAGE

PICTURES ENCLOSED PER YOUR REQUEST SHOWING DAILY COVERING OF THE LANDFILL.
IF THERE IS ANY THING ELSE YOU NEED, PLEASE DO NOT HESITATE TO CALL.

Date 5-23-86 Signed Jim Lucero

REPLY

I have received your photos and found the Crazy Horse landfill to be in compliance with CAC Title 14 ~~Sect~~ Section 17682, Cover. Please remember that this standard requires cover of 6", compacted, over all surfaces of Group II (or III) wastes on your landfill on a daily basis.

Date 6/11/86 Signed Pam Badger

WilsonJones
GRAYLINE FORM 44-902 3-PART
©1983 • PRINTED IN U.S.A.

RECIPIENT—RETAIN WHITE COPY, RETURN PINK COPY
85

[redacted]

working file

STATE OF CALIFORNIA GEORGE DEUKMEJIAN, Governor

CALIFORNIA WASTE MANAGEMENT BOARD
1020 NINTH STREET, SUITE 300
SACRAMENTO, CA 95814

DEC 0 1 1986

2nd

To: Mr. R.M. Rossi, President
Salinas Disposal Service
P.O. Box 3830
Salinas, CA 93907

Subject: Report of inspection: Crazy Horse Sanitary Landfill
27-AA-07

Government Code Section 66796.38 requires the California Waste Management Board (Board) to conduct inspections of solid waste facilities for the purpose of evaluating compliance with the State Standards for Solid Waste Handling and Disposal (Title 14. California Administrative Code, Division 7 Chapter 3, commencing with section 17200). Under this program, each facility will be inspected at least three separate times. As you are probably aware, the subject facility received its second inspection on October 23, 1986. Enclosed please find the Evaluation Report resulting from this second inspection. Copies of photographs or slides referred to in the report are available from the Board upon written request.

The goal of our inspection program is to verify compliance with each of the State Minimum Standards, not merely to find violation(s) of these standards. In order to achieve this we will, as I stated above, be inspecting each facility at least three times. This will provide the following advantages over the previous inspection techniques:

* The program will provide greater fairness to operators of facilities by reducing the possibility that one operator will be inspected under adverse conditions and another under favorable conditions.

* The program will allow for evaluation of conditions, which show seasonal variations such as effectiveness of leachate control systems, vectors, dust, etc.

* The program will provide a track record of compliance which will be used in evaluating standards for which a single violation may not be sufficient reason to place the facility on the State List of Non-Complying Facilities when the facility is generally in compliance with that standard, i.e., the daily cover standard.

Although we do not intend to provide advance notice of the inspection dates to operators, the Local Enforcement Agency (LEA) will be notified of those dates, and will be invited to accompany our staff on the inspection.

If, after the third inspection, your facility continues to be operating in violation of one or more of the State Minimum Standards you will be notified of this finding by certified letter. A copy of that letter will be sent to the LEA. After 90 days or upon notification of correction of all violations(s), Board staff will reinspect the facility. If the facility is still in violation, staff will notify you and the LEA, by certified letter of staff's intent to recommend that the Board place the facility's name on the State List of Non-Complying Facilities at a regularly scheduled meeting of the Board. Should the Board place the facility on that list, State law (Government Code 66796.39) requires that the LEA develop a compliance schedule for correction of the violation(s). If compliance is not achieved within one year, Government Code section 66796.39 directs LEAs to revoke facility operating permits. If the facility is closed or abandoned, staff will recommend that the LEA issue a notice of violation and an order to correct the violations. That Notice and Order will also notify you or the owner of the facility that State law provides that "the unremedied condition of the facility is prima facie evidence of negligence, and in any action for damages against the owner of the property for injury caused by the unremedied condition, the burden of proving the injury was not caused by an unremedied condition shall be on the owner of the property".

If you have any questions regarding the program, please contact me at (916) 322-1769.

Sincerely,

John K. Bell, Manager
Monitoring Section

Enclosure

cc: Walter Wong, Monterey County Environmental Health

mea

CALIFORNIA WASTE MANAGEMENT BOARD

DISPOSAL SITE
EVALUATION REPORT

Facility Name: Crazy Horse Sanitary L.F. **Facility ID No.:**27-AA-07

Name of Inspector: H. Berton **Inspection Dates:**10/23/86

Signature: H. Berton

CAC Section:	Observations:	Conclusions:
Disposal Site Information:		
17616 Report of Disposal Site Information	The current RDSI fully describes the existing operation.	Comply
Design Responsibility:		
17626 Design Responsibility	This standard applies to new facilities only.	N/A
17627 Ultimate Use	The ultimate use of this facility has been designated as a regional park.	Comply
17628 General Design Parameters	The site design accounted for all factors in Section 17628.	Comply
17629 Public Health Design Parameters	The design meets the criteria listed in Section 17629	Comply

Section Manager

Facility Name: Crazy Horse Sanitary L.F. Facility ID No.:27-AA-07

Name of Inspector: H. Berton Inspection Dates:10/23/86

Signature: H. Berton

CAC Section:	Observations:	Conclusions:
17636 Weight/Volume Records	I reviewed the daily volume records which were accurate for forecasting the rate of site filling and for planning purposes. The volume of loose and compacted waste received for the month of August 1986 was 57, 934 cubic yards. The source of this information was from the self monitoring form that is submitted monthly to the Regional Water Quality Control Board. Weight volume records were kept in the scalehouse.	Comply
17637 Subsurface Records	I reviewed copies of subsurface records which were on site of the California Waste Management Board. These records consisted of detailed engineering reports.	Comply
17638 Special Occurrences	I reviewed the log of special occurrences which was maintained by the operator and was kept in the scalehouse.	Comply
17639 Inspection of Records	I reviewed records which were available during normal business hours. All records were kept in the scalehouse.	Comply
Disposal Site Personnel:		
17646 Availability	The site had five qualified employees to properly operate the facility.	Comply
17647 Training	Training was of the on-the-job type. I observed site personnel working and no activity was restricted due to lack of training.	Comply

Facility Name: Crazy Horse Sanitary L.F. **Facility ID No.:**27-AA-07

Name of Inspector: H. Berton **Inspection Dates:**10/23/86

Signature: H. Berton

CAC Section:	Observations:	Conclusions:
17648 Supervision	There were supervisory personnel on site. I did not see any conditions I felt were due to a lack of supervision.	Comply
17649 Site Attendant	The site was attended during operating hours.	Comply
Disposal Site Improvements:		
17656 Identification Signs	Identification signs were located at the gate and contained the required information.	Comply
17657 Entry Signs	Entry signs were located at the gate and stated fees, hours of operation, and types of materials which are/are not accepted. (See photo #II-9).	Comply
17658 Site Security	There is no fencing along the northern edge of the site which is immediately adjacent to Crazy Horse Canyon Road. This allows for unauthorized entry to this site by persons or vehicles. (See photo #II-1).	Violation
17659 Access Roads	Roads were smooth and passable and allowed good access to the site. I did not see excessive dust or tracking of material onto adjacent paved public roads.	Comply
17660 Internal Roads	Internal roads were passable and in such a condition that vehicle access and unloading were not impeded. Roads were suitably signed.	Comply
Disposal Site Health and Safety:		
17666 Sanitary Facilities	Sanitary facilities were available on site.	Comply

Facility Name: Crazy Horse Sanitary L.F. Facility ID No.:27-AA-07

Name of Inspector: H. Berton Inspection Dates:10/23/86

Signature: H. Berton

CAC Section:	Observations:	Conclusions:
17667 Water Supply	Bottled drinking water was supplied to site personnel.	Comply
17668 Communications Facilities	There were phones on site. Phone #: (408) 663-2796	Comply
17669 Lighting	This site did not operate during hours of darkness.	Comply
17670 Personnel Health and Safety	The LEA did not require that specific safety items be used.	Comply
Disposal Site Operations:		
17676 Confined Unloading	I observed that the unloading area was properly confined.	Comply
17677 Spreading and Compacting	I observed that waste was properly spread and compacted.	Comply
17678 Slopes and Cuts	The slope of the working face was such that effective compaction of waste was maintained. The measured angle, by clinometer, was 10 degrees which is equal to a ratio of 1.73:1, horizontal to vertical.	Comply
17679 Final Site Face	The final exterior surface appeared neat and finished and was of proper slope. The measured angle by clinometer was 30 degrees which is equal to a ratio of 1.73:1, horizontal to vertical.	Comply
17680 Stockpiling	I observed no stockpiles.	Comply

Facility Name: Crazy Horse Sanitary L.F. **Facility ID No.:**27-AA-07

Name of Inspector: H. Berton **Inspection Dates:**10/23/86

Signature: H. Berton

CAC Section:	Observations:	Conclusions:
17681 Availability of Cover	Cover is available from a borrow pit located along the northwestern edge of the site and according to the RDSI is available for the life of the site.	Comply
17682 Cover	Waste was being covered at the required frequency. Photographs taken in the morning and at the end of the operating day document this. (See photo # II-2, II-3).	Comply
17683 Performance Standards	This was not a performance standard site.	N/A
17684 Intermediate Cover	Areas identified as intermediate cover by Jim Lucero, Site Manager, did not have any exposed waste. Intermediate cover areas were located south of Crazy Horse Canyon Rd.	Comply
17685 Final Cover	There are no areas of final cover.	N/A
17686 Scavenging	I did not observe any scavenging.	Comply
17687 Salvaging Permitted	Salvaging is permitted and occurred in a clearly defined, organized and controlled manner. The salvage was located south of Crazy Horse Canyon Road. Types of material salvaged include chairs, tables, metals, etc.	Comply
17688 Volume Reduction and Energy Recovery	Volume Reduction and Energy Recovery were not observed.	Comply

Facility Name: Crazy Horse Sanitary L.F. Facility ID No.:27-AA-07

Name of Inspector: H. Berton Inspection Dates:10/23/86

Signature: H. Berton

CAC Section:	Observations:	Conclusions:
17689 Processing Area	Salvaging occurred in a clearly defined area.	Comply
17690 Storage of Salvage	Storage of salvage occurred in clearly defined areas and was not likely to cause a safety hazard or public nuisance.	Comply
17691 Removal	Salvage storage time did not seem excessive and would not have caused a safety or fire hazard or become a public nuisance.	Comply
17692 Non-Salvageable Items	I did not observe the salvage of any items defined as non-salvageable by this section.	Comply
Disposal Site Controls:		
17701 Nuisance Control	The operation did not cause a public nuisance.	Comply
17702 Animal Feeding	I did not observe animals feeding on waste.	Comply
17703 Fire Control	Fire Control methods include the use of bulldozers, a water truck, fire extinguishers, and fire breaks. I did not observe any fires or see evidence of recent fires.	Comply

Facility Name: Crazy Horse Sanitary L.F. Facility ID No.:27-AA-07

Name of Inspector: H. Berton Inspection Dates:10/23/86

Signature: H. Berton

CAC Section:	Observations:	Conclusions:
17704 Leachate Control	The site has a functioning leachate control system. Jim Lucero, Site Manager, monitors for leachate on a regular basis. I observed no leachate leaving the site. The City of Salinas has contracted with James A. Montgomery, Consulting Engineers to determine the source of groundwater contamination. The study will consist of three phases, two of which have been completed. The lawsuit filed by the three neighboring homeowners is still in litigation pending completion of the groundwater study. The next inspector should update the progress of the groundwater study and status of the lawsuit.	Indeterminate
17705 Gas Control	The gas recovery system was not operating due to the presence of metal filings in the oil which damaged some bearings in the generator engine. According to Cy Appel, the system should be operating by 11/17/86. There is an active gas monitoring system as required by the permit. I monitored for landfill gas migration at three locations along the southern perimeter due to the presence of three houses within 1000 feet of the site boundary readings were below 5% but have not been verified. There were no on site structures.	Indeterminate
17706 Dust Control	I did not observe any conditions which could lead to a dust problem.	Comply
17707 Vector and Bird Control	I observed no vectors.	Comply

Facility Name: Crazy Horse Sanitary L.F. **Facility ID No.:**27-AA-07

Name of Inspector: H. Berton **Inspection Dates:**10/23/86

Signature: H. Berton

CAC Section:	Observations:	Conclusions:
17708 Drainage and Erosion Control	There were areas north of the leachate collection pond, above the grove of eucalyptus trees, where erosion had exposed waste. (See photo #II-4 through II-6).	Violation
17709 Contact with Water	I observed no waste in contact with water.	Comply
17710 Grading of Fill Surfaces	Grading accounted for settlement and promoted lateral runoff.	Comply
17711 Litter Control	I did not observe any accumulations of litter I felt could lead to a litter nuisance.	Comply
17712 Noise Control NOT TRUE	Due to the isolated nature of this site I did not observe any condition which I felt could lead to a noise nuisance.	Comply
17713 Odor Control	Slight odors were detected on site but not at the site perimeter.	Comply
17714 Traffic Control	Traffic flow did not cause a public safety hazard and I did not observe vehicles stacking onto public roads.	Comply
17715 Ponded Liquid	I did not observe any vector propagation in the leachate collection pond.	Comply

Facility Name: Crazy Horse Sanitary L.F. Facility ID No.:27-AA-07

Name of Inspector: H. Berton Inspection Dates:10/23/86

Signature: H. Berton

CAC Section:	Observations:	Conclusions:
Disposal Site Equipment:		
17726 General	The numbers and types of equipment on site were consistant with requirements listed in the RDSI. Equipment consists of ~~2~~ compactors, 2 scrapers, 1 grader, 1 water truck, and 3 bulldozers.	Comply
17727 Standby Equipment	Proper standby equipment was available on site.	Comply
Disposal Site Maintenance:		
17731 General	Equipment and facility maintenance programs meet the requirements of Section 17731.	Comply
17732 Operating Site Maintenance	As there were fewer than three maintenance related sections in violation, this site complies with Section 17732.	Comply
17733 Insp. on Completion	This is not a closed site.	N/A
17734 Completed Site Maintenance	This is not a closed site.	N/A
17735 Recording	This site pre-exists the implementation of this standard and has not closed.	N/A
Disposal Site Special Wastes:		
17741 Burning Wastes	I did not observe any burning waste at this site.	Comply

Facility Name: Crazy Horse Sanitary L.F. **Facility ID No.:**27-AA-07

Name of Inspector: H. Berton **Inspection Dates:**10/23/86

Signature: H. Berton

CAC Section:	Observations:	Conclusions:
17742 Hazardous Wastes	I did not observe any hazardous waste at this site.	Comply
17743 Liquid Wastes	I observed no liquid waste.	Comply
17744 Dead Animals	I observed small dead animals being received from the animal control facility. The animals were individually wrapped in garbage bags and buried by waste at the toe of the fill. Local regulations permit the site to accept small dead animals. (See photo #II-10, II-11.	Comply
Disposal Site Reports and Reviews:		
17751 Periodic Site Review	The site underwent an engineering site review in 1983 and was signed by an engineer.	Comply

Notes:

SWIS-00 (REV. 1/85)

NOTICE OF INSPECTION DISPOSAL SITE

LOCAL ENFORCEMENT AGENCY: _____

FACILITY FILE NUMBER (COUNTY LEA NUMBER)	PROGRAM CODE	INSPECTION DATE (MM DD YY)	T-OUT / T-IN	TOTAL TIME (DECIMAL HOURS)
27 AA 07	P	(1011) 10/23/86		(1031) II

FACILITY NAME: Crazy Horse B.F.

FACILITY LOCATION:

INSPECTOR: H. Bitton

ALSO PRESENT: Jim Lucas, Mary Dennis-Bennitt

RECEIVED BY:
Operator _____
Owner _____

Comments: _____

IND - Indeterminate

	*V	C
(3011) RECORDS		☒
☐ ACCURATE WEIGHT/VOLUME RECORDS MAINTAINED 17636		
☐ ADEQUATE SUBSURFACE RECORDS MAINTAINED 17637		
☐ LOG OF SPECIAL OCCURRENCES MAINTAINED 17638		
☐ RECORDS AVAILABLE FOR INSPECTION 17639		
(3021) PERSONNEL		☒
☐ ADEQUATE NUMBER OF QUALIFIED PERSONNEL AVAILABLE 17646		
☐ PERSONNEL ADEQUATELY TRAINED 17647		
☐ ADEQUATE SUPERVISION PROVIDED 17648		
☐ SITE ATTENDANT AVAILABLE FULL-TIME OR AS DETERMINED BY LEA 17649		
(3031) SIGNS		☒
☐ IDENTIFICATION SIGNS AT EACH POINT OF ACCESS 17656		
☐ ENTRY SIGN STATES FEES, HOURS OF OPERATION, WASTES ACCEPTED/NOT ACCEPTED 17657		
☐ NON-HAZARDOUS UNATTENDED SITES HAVE SIGN WARNING USERS OF UNAVAILABILITY OF COMMUNICATION FACILITIES 17658		
(3041) SECURITY	☒	
☐ ADEQUATE PERIMETER SECURITY, HAZARDOUS AREAS FENCED AND IDENTIFIED 17659		
(3051) ROADS		☒
☐ ACCESS ROADS HAVE SMOOTH SURFACE, MINIMIZE DUST AND TRACKING OF MUD, AND ALLOW ALL-WEATHER ACCESS 17659		
☐ INTERNAL ROADS IN SAFE CONDITION, PROVIDE ACCESS DURING INCLEMENT WEATHER, AND ARE PROVIDED WITH DIRECTIONS 17660		
(3071) SANITATION		☒
☐ ADEQUATE SANITARY FACILITIES AVAILABLE 17666		
☐ SAFE ADEQUATE DRINKING WATER AVAILABLE 17667		
(3081) COMMUNICATIONS		☒
☐ COMMUNICATION FACILITIES AVAILABLE WHERE HAZARDOUS WASTES ARE ACCEPTED 17668		
(3091) LIGHTING		☒
☐ LIGHTING ADEQUATE 17669		
(3101) SAFETY		☒
☐ SAFETY EQUIPMENT IN USE AND BEING WORN 17670		

	V	C
(3111) CONFINED UNLOADING		☒
☐ UNLOADING ADEQUATELY CONFINED 17675		
(3141) SPREADING/COMPACTING		☒
☐ SPREADING AND COMPACTION IN TWO-FOOT LAYERS 17677		
(3151) SLOPES/CUTS/GRADING		☒
☐ WORKING FACE SLOPES ALLOW EFFECTIVE COMPACTION, DEPTH OF CUTS AND SLOPES OF TRENCH SIDES AS APPROVED BY LEA 17678		
☐ FINAL SLOPES HAVE NEAT APPEARANCE AND ARE 1-3/4 : 1 OR FLATTER 17679		
☐ GRADING OF FILL SURFACES ADEQUATE 17710		
(3161) COVER		☒
☐ STOCKPILING OF COVER DOES NOT INTERFERE WITH OPERATIONS 17680		
☐ SUITABLE QUALITY AND SUPPLY OF COVER MATERIAL AVAILABLE 17681		
☐ COVER PROVIDED AT REQUIRED DEPTH AND FREQUENCY 17682		
☐ INTERMEDIATE COVER PROVIDED AT REQUIRED DEPTH AND FREQUENCY 17684		
☐ FINAL COVER PROVIDED AS REQUIRED 17688		
(3171) SALVAGING/PROCESSING		☒
☐ SCAVENGING PROHIBITED 17686		
☐ SALVAGING DOES NOT INTERFERE WITH OPERATIONS 17687		
☐ VOLUME REDUCTION AND ENERGY RECOVERY DO NOT INTERFERE WITH OPERATIONS OR CREATE HEALTH, SAFETY OR ENVIRONMENTAL PROBLEMS 17688		
☐ SALVAGING AND VOLUME REDUCTION CONFINED TO CLEARLY IDENTIFIED AREAS 17689		
☐ SALVAGE STORAGE LOCATION OR VOLUME AS APPROVED BY LEA, MINIMIZES FIRE, NUISANCE 17690		
☐ SALVAGE STORAGE TIME DOES NOT RESULT IN HEALTH OR FIRE PROBLEMS 17691		
☐ SALVAGED MATERIALS APPROVED BY LEA AND LOCAL HEALTH 17692		
(3181) NUISANCE		☒
☐ OPERATIONS DO NOT CREATE A PUBLIC NUISANCE 17701		
☐ FEEDING OF REFUSE TO ANIMALS FOR HUMAN CONSUMPTION PROHIBITED 17702		

	V	C
(3191) FIRE		☒
☐ FIRE CONTROL ADEQUATE 17703		
(3192) FIRE (P)		
☐ BURNING MATERIALS SPREAD AND EXTINGUISHED, LEA, SWMB NOTIFIED IMMEDIATELY OF FIRE NOT EXTINGUISHED IN 24 HOURS 17683		N/A
(3201) LEACHATE		
☐ ADEQUATE STEPS TAKEN TO MONITOR, COLLECT, TREAT, AND DISPOSE OF LEACHATES 17704		
☐ NO WASTES IN DIRECT CONTACT WITH WATER EXCEPT AS APPROVED BY RWQCB 17709		IND
(3202) LEACHATE (P)		
☐ REFUSE COVERED WITH NEXT DAY'S REFUSE OR WITH SIX INCHES OF COMPACTED SOIL. TOTAL AREA OF EXPOSED REFUSE IS AS SPECIFIED FOR WET AND DRY SEASONS 17683		N/A
(3211) GAS		
☐ GAS MONITORING AND CONTROL AS REQUIRED 17705		IND
(3221) DUST		☒
☐ DUST CONTROL ADEQUATE 17706		
(3231) VECTORS/BIRDS		☒
☐ VECTOR AND BIRD CONTROL ADEQUATE 17707		
☐ LIQUID PONDS MINIMIZE VECTOR PROPAGATION 17715		
(3232) VECTORS (P)		
☐ THRESHOLD VALUES FOR VECTOR POPULATIONS NOT EXCEEDED 17683		N/A
(3241) DRAINAGE/EROSION	☒	
☐ DRAINAGE AND EROSION CONTROL ADEQUATE 17708		
(3251) LITTER		☒
☐ LITTER CONTROL ADEQUATE 17711		
(3252) LITTER (P)		
☐ LITTER NOT ALLOWED TO MIGRATE OFF-SITE 17683		N/A
(3261) NOISE		☒
☐ NOISE CONTROL ADEQUATE 17712		
(3271) ODOR		☒
☐ ODOR CONTROL ADEQUATE 17713		
(3272) ODOR (P)		
☐ AMBIENT AIR AT OR BEYOND FACILITY BOUNDARY IS NOT ODOROUS 17683		N/A

	V	C
(3281) TRAFFIC		☒
☐ TRAFFIC CONTROL ADEQUATE WITHIN SITE, TRAFFIC MINIMIZES INTERFERENCE, SAFETY PROBLEMS, AND STACKING ON PUBLIC ROADS 17714		
(3291) EQUIPMENT		☒
☐ EQUIPMENT ADEQUATE IN TYPE, CAPACITY, AND NUMBER, AND IS ADEQUATELY MAINTAINED 17726		
☐ STANDBY EQUIPMENT AVAILABLE TO COMPLY WITH SEC. 17682 AND OTHER SECTIONS 17727		
(3301) MAINTENANCE		☒
☐ EFFECTIVE MAINTENANCE PROCEDURES AND PROGRAMS DEVELOPED AND UTILIZED 17731		
☐ ADEQUATE MONITORING AND REPAIR OF DETERIORATED CONDITIONS 17732		
(3311) CLOSURE		
☐ AFTER CLOSURE, IF LEACHATE, EXTENSIVE SURFACE CRACKING OR SETTLEMENT OCCURS, THE OWNER SHALL NOTIFY LEA AND SHALL MONITOR AND REPAIR SITE FOR A PERIOD OF 5 YEARS OR LONGER 17734		N/A
☐ UPON SITE CLOSURE, DETAILED DESCRIPTION MUST BE FILED WITH THE LEA AND WITH THE COUNTY RECORDER 17735		
(3321) SPECIAL WASTES		☒
☐ BURNING WASTES IMMEDIATELY SPREAD AND EXTINGUISHED IN SAFE AREA 17741		
☐ SITE ACCEPTS ONLY APPROVED HAZARDOUS WASTES AND TAKES PRECAUTIONS TO ELIMINATE OR CONTROL HARMFUL DUSTS, FUMES, MISTS, VAPORS, OR GASES 17742		
☐ LIQUID WASTES APPROVED BY RWQCB, LOCAL HEALTH ENTITY AND LEA 17743		
☐ DEAD ANIMALS ALLOWED BY LOCAL REGULATIONS 17744		
(3331) OTHER		
☐ _____		

*V = Violation
C = Compliance

DISTRIBUTION: WHITE — CWMB YELLOW — OPERATOR PINK — LEA

Bell

OCT 02 1986

City of Salinas
PUBLIC WORKS DEPARTMENT • 200 Lincoln Avenue • Salinas, California 93901 • (408) 758-7241

September 22, 1986

California Waste Management Board
1020 9th Street Suite 200
Sacramento, CA 95814

SUBJECT: REPORT OF INSPECTION CRAZY HORSE SANITARY LANDFILL 27-AA-07

Reference is made to your report subject as above dated August 5, 1986. Your report covered an inspection conducted on May 21 and 22, 1986 at the Crazy Horse Sanitary Landfill. The purpose of this correspondence is to bring you up to date with remedial actions. For ease of reading remedial actions have been provided on the attached summary sheet. Should you have any questions or comments please contact me at 408-758-7106.

CITY OF SALINAS

CY APPEL
Public Service Superintendent

CA:lc

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CAC Section:	Observations:	Conclusions:	Remedial Action Taken:
17616 Report of Disposal Site Information	The site no longer has gas monitoring probes. They have been incorporated into the gas recovery system. Gas monitoring is required in the Report of Station Information (RDSI) and in the Permit.	Violation	Gas monitoring probes numbers P1 and P2 were removed during the process of drilling ground water monitoring wells. Active probes still in existence on the site are highlighted in yellow on the enclosed map. Apparently the inspector was not informed as the presence of the other probes. The City of Salinas will install additional probes in compliance with the Calderon Bill these additional probes will replace those which had been destroyed.
17627 Ultimate Use	No ultimate use has been described in either the RDSI or the Permit.	Violation	The desingated ultimate use of the Crazy Horse Sanitary Landfill is a regional park. The fact that this does not exist in the permit is indicative of a deficiency on the part of the permitting agency. Please correct your records accordingly.
17682 Cover	Subsequent inspectors should evaluate this section carefully, as I as not able to see for myself that daily cover was applied. The amount of time taken to cover this site may have been slightly greater than one day and required photographic verification provided by the operator.	Indeterminate	The operator provided pictures to your office on May 23, 1986 and was advised on June 11, 1986 by Pam Badger that the landfill was in compliance.

CAC Section:	Observations:	Conclusions:	Remedial Action Taken:
17684 Intermediate Cover	There was a considerable amount of exposed waste in the intermediate cover areas. Part of the eastern area was in process of having the 12 inch intermediate cover applied. Subsequent inspectors should check to see the intermediate cover area has been properly covered.	Violation	Intermediate cover has been reapplied to the landfill.
17[illegible]4 Leachate Control	This site had a functioning leachate control system. The site manager, Jim Lucero, monitors for leachate on a regular basis. However, the site is currently being sued by three neighboring homeowners who claim their wells have been contaminated by the landfill. They currently cannot use their water. This section shall be indeterminate pending the outcome of the lawsuit and pending determination of compliance to Subchapter 15 by the Regional Water Quality Control Board. The RWQCB is also waiting for litigation outcome to determine the source of contamination.	Indeterminate	Your observations are correct The City is working closely with the Regional Water Quality Control Board and its consultants, James M. Montgomery, Consulting Engineers, Inc. to develop a long term resolution.
11705 Gas Control	The site is in violation because it no longer has an active gas monitoring system as required to its permit. The site will be referred to the California Waste Management Board's Standards and Technologies Program for further study. I tested for landfill gas migration on the southern perimeter across from each of the three houses mentioned in Section 17704. I found a reading 0% as methane across from the westernmost house, 4%	Violation	At the time that the observation was made, the methane extraction system was turned off. The methane extracting system has since been reactivated and currently methane is being extracted throughout the landfill through the methane extraction well system. This extraction will continue. The missing gas monitoring

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CAC Section:	Observations:	Conclusions:	Remedial Action Taken:
	near the center house, and 3% near the easternmost house.		probes will be reinstalled in compliance with the Calderon Bill and the City's operational consultant EMCON Associates of San Jose, California has been directed to proceed with this program.
17708 Drainage and Erosion Control	There were places on southwestern section and on the northern edge of the fill where erosion had exposed waste. There was a large eroded area at the center of the hillside. The drainage channel on the northern perimeter had silted up, as had the drain on the southern perimeter.	Violation	A peripheral drain is currently under construction and will be completed before the rainy season. This drain will channel water on the eastern side of the landfill and its construction includes the improvement of the catch-basin.

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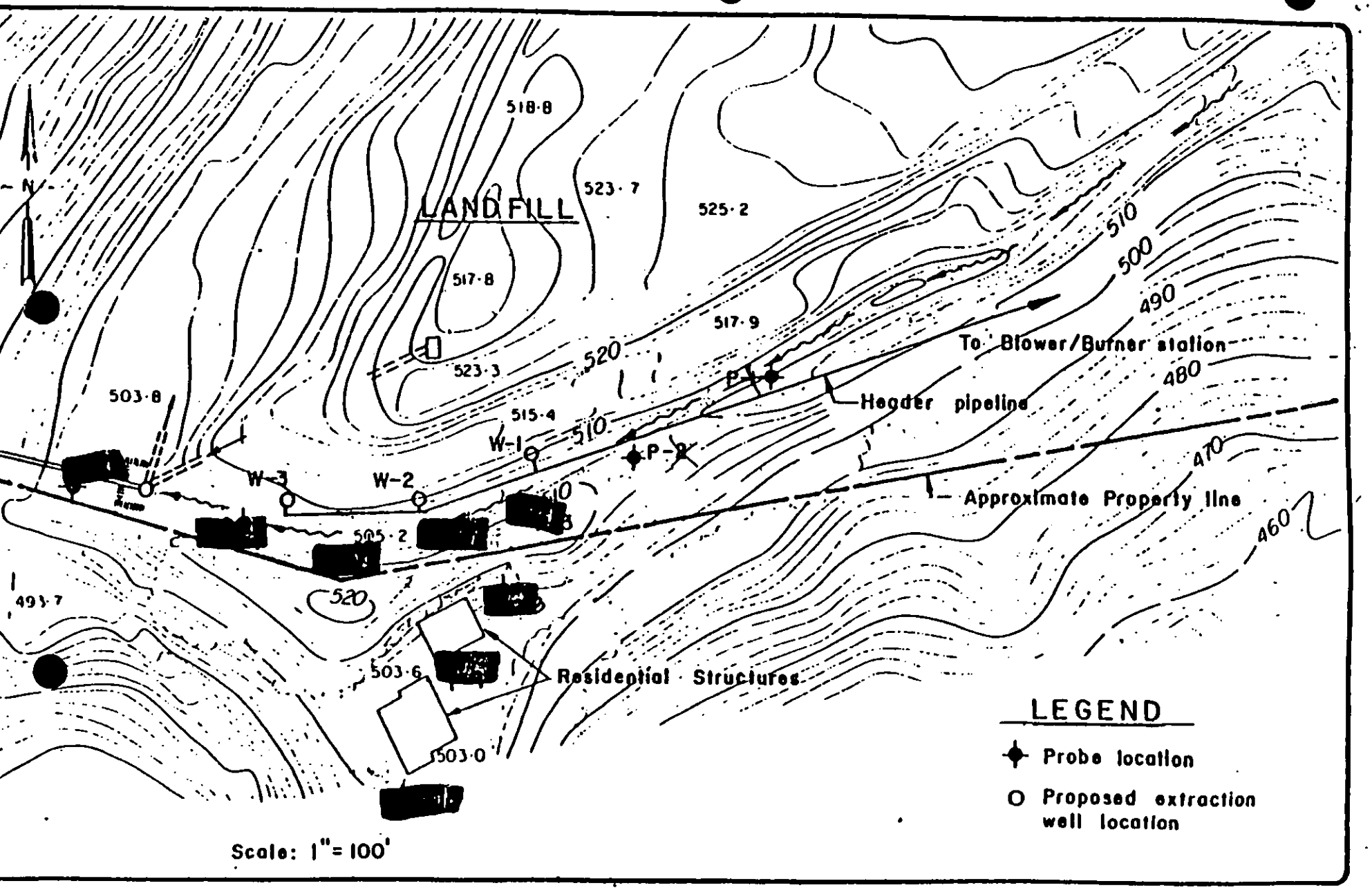

EMCON Associates
San Jose, California

CITY OF SALINAS
CRAZY HORSE SANITARY LANDFILL
MONTEREY COUNTY, CALIFORNIA

PROBE LOCATION AND CONCEPTUAL GAS EXTRACTION SYSTEM

FIGURE 1

PROJECT NO. 358-13G

STATE OF CALIFORNIA

GEORGE DEUKMEJIAN, Governor

CALIFORNIA WASTE MANAGEMENT BOARD
1020 NINTH STREET, SUITE 300
SACRAMENTO, CA 95814

To: Mr. R. M. Rossi
Salinas Disposal Service, Inc.
P.O. Box 3830
Salinas, CA &zip&

Subject: Report of Inspection: Crazy Horse Sanitary Landfill 27-AA-07

Government Code Section 66796.38 requires the California Waste Management Board (Board) to conduct inspections of solid waste facilities for the purpose of evaluating compliance with the State Standards for Solid Waste Handling and Disposal (Title 14. California Administrative Code, Division 7 Chapter 3, commencing with section 17200). Under this program, each facility will be inspected at least three separate times. As you are probably aware, the subject facility received its third inspection on 1/13 & 16/87. Enclosed please find the Evaluation Report resulting from this third inspection. Copies of photographs or slides referred to in the report are available from the Board upon written request.

Results of the three field inspections along with all pertinent supporting data in our files have now undergone staff review. A final staff report is currently being prepared and will be sent to you as soon as possible. We are concerned with the following repeated and/or uncorrected violations of State Minimum Standards:

17705 - Gas Control
17708 - Drainage and Erosion Control

At the March meeting of the California Waste Management Board tentatively scheduled for March 26-27, 1987, staff will report on its evaluation of the subject facility. Staff will recommend that the Board direct you to take specific corrective actions to gain compliance with State Minimum Standards. If the Board accepts this recommendation, you will be directed to submit a letter to the Board within 30 days stating specific dates for initiating and completing the corrective actions.

If this letter is not received by the Board within 30 days, or if the dates for implementing the required actions are not met, progress towards compliance will be deemed unsatisfactory. Verification of all deadlines will be made through additional staff inspections as necessary. If at any time progress is deemed unsatisfactory, a 90 day notice will be issued by the Chief Executive Officer stating the Board's intent to place the site on the State List of Non-Complying Facilities.

You should be aware that the Board may direct staff to issue a 90 day notice of it's intent to list the site rather than allow for additional time for compliance as recommended by staff.

You are invited to address the Board with any information you feel the Board should consider at its March meeting. A notice of the meeting will be sent at least 10 days prior to the scheduled date.

A copy of this letter and the enclosed report will be sent to the LEAs. If you have any questions regarding this program, please contact me at (916) 322-1769.

Sincerely,

John K. Bell

John K. Bell, Manager
Monitoring Section

cc: Mary Anne Dennis-Bannister, Monterey Co. Health Department
Cy Appel, City of Salinas

mea

CALIFORNIA WASTE MANAGEMENT BOARD

SOLID WASTE FACILITY
EVALUATION REPORT

Facility Name: Crazy Horse Landfill Facility ID No.: 27-AA-07

Name of Inspector: Martha Vazquez Inspection Dates: 1/13 & 16/87

Signature: M. Vázquez

LEGEND

C = Compliance V = Violation
I = Indeterminate N = Not Applicable

CAC	SECTION	OBSERVATIONS	RESULT
		DISPOSAL SITE INFORMATION	
17616	Report of Disposal Site Information.	I reviewed the RDSI dated December 1980, and found that it satisfactorily described site operations.	C
		DESIGN RESPONSIBILITY.	
17626	Design Responsibility	Design responsibility criteria were properly met in the development of this facility.	C
17627	Ultimate Use.	The ultimate use of this facility has been designated as a regional park. The use was specified in correspondence from Cy Appel, City of Salinas, Public Service Superintendent, to the Board on 9/22/86.	C
17628	General Design Parameters.	The site design accounted for all factors listed in Section 17628.	C

Section Manager JKB

CAC	SECTION	OBSERVATIONS	RESULT
17629	Public Health Design Parameters	The site design meets all criteria listed in Section 17629.	C
		DISPOSAL SITE RECORDS.	
17636	Weight/Volume Records.	I reviewed weight/volume records at the on site office. Monthly records are kept of the sources from which waste is received. From the monthly records I calculated that a daily average of 305.9 yd3/day (438.3 tons/day) was received at this site from 1/86 - 12/86.	C
17637	Subsurface Records.	The operators of this site maintained detailed subsurface records. I review them at the on site office.	C
17638	Special Occurrences.	A record of special occurrences was kept in conjunction with the Daily Operational log.	C
17639	Inspection of Records.	All required records were made immediately available to me at the on site office.	C
		DISPOSAL SITE PERSONNEL.	
17646	Availability.	One part time and four full time employees operate this facility. No operation appeared to be restricted by a lack of personnel.	C
17647	Training.	Site employees are hired with prior experience and they receive on the job training. No activity was restricted because of a lack of training.	C
17648	Supervision.	Jim Lucero is the Supervising Site Operator. He was present the day of this inspection. I did not see any adverse conditions that were due to a lack of supervision.	C

Inspector: M. Vázquez

CAC	SECTION	OBSERVATIONS	RESULT
17649	Site Attendant.	The site was properly attended. There was a scaleperson at the gatehouse, and an attendant at the salvage area.	C
		DISPOSAL SITE IMPROVEMENTS.	
17656	I.D. Signs.	Identification signs displaying the site's name were present at the main entrance.	C
17657	Entry Signs.	Entry signs displaying all required information were present at the main gate.	C
17658	Site Security.	This site was secured with a perimeter fence, topographic barriers, and a locking gate. I did not observe evidence of unauthorized entry.	C
17659	Access Roads.	The main access was via a smooth paved two lane road. This roadway allowed safe access for all vehicles.	C
17660	Internal Roads.	Internal roads were surfaced with soil. They were smooth and allowed safe access to all active site areas.	C
		DISPOSAL SITE HEALTH AND SAFETY.	
17666	Sanitary Facilities.	Complete sanitary facilities were available on site. These included: one septic tank toilet; one portable toilet; and two sinks for washing up.	C
17667	Water Supply.	Bottled drinking water was provided to site personnel.	C
17668	Communication Facilities.	A telephone was located at the gatehouse. The telephone number is (408) 663-2796.	C
17669	Lighting.	This site does not operate during hours of darkness. This section is not applicable.	N

Inspector: M. Vazquez

CAC	SECTION	OBSERVATIONS	RESULT
7670	Personnel Health and Safety.	Operating personnel are issued helmets, hearing protection, safety glasses, and safety boots. The LEA does not require specific safety equipment.	C
		DISPOSAL SITE OPERATIONS.	
17676	Confined Unloading.	The public unloading area was at the toe of the active slope. The commercial unloading area was at the top of the active slope. Both unloading areas were well confined and correct in size for the number of vehicles using this site. (See slides III.1 and III.2).	C
17677	Spreading and Compacting.	I observed that all waste was thoroughly spread and compacted throughout the inspection day. (See slides III.3 and III.11).	C
17678	Slopes and Cuts.	I measured the slope of the working face with a clinometer and found it to be five to seven degrees (11.5 to 8.13:1.00 horizontal to vertical ratio). This angle allowed good compaction of all waste.	C
17679	Final Site Face.	The final site face was identified to prior inspectors by site supervisor, Jim Lucero. The final cover face is the slope just east of the leachate basin. The slope of this face was found to have the proper angle and finish by previous inspectors. I did not inspect this slope.	C
17680	Stockpiling.	Stockpiles of cover material are not maintained at this site. This section is not applicable.	N
17681	Availability of Cover.	Cover is excavated from the northwest corner of the site. Joe Lucero, operating Site Supervisor, informed me that towards the end of the site's life cover material will need to be imported.	C

Inspector: M. Vazquez

CAC	SECTION	OBSERVATIONS	RESULT
17682	Cover.	I observed that waste was applied over the entire working face at the end of operating day 1/13/87.	C
17683	Performance Standards.	As this site does not operate under performance standards, this section is not applicable.	N
17684	Intermediate Cover.	Intermediate cover areas were identified by Operating Site Supervisor, Jim Lucero. I observed that all intermediate cover areas were well covered and had no daylighting of waste. (See slides III.14 - III.17).	C
17685	Final Cover.	No final cover areas were specified by Operating Site Supervisor, Jim Lucero.	M
17686	Scavenging.	I did not observe scavenging at this facility.	C
17687	Salvaging Permitted.	There was a salvaging operation conducted at this site. Metals, batteries, white goods, and usable items are salvaged by private operator, Leo Fenstermaker. The salvaging operation was conducted in a planned and controlled fashion.	C

Inspector: M. Vázquez

CAC	SECTION	OBSERVATIONS	RESULT
17688	Volume Reduction and Energy Recovery.	A gas extraction operation was conducted on site. I spoke with Dave Hunsinger, Operator Mechanic and Mary Ann Epperson, Field Technician of Pacific Lighting Energy Systems. They provided me with the following information about the operation: 1) The operation has just recently come on-line. It had been in intermittent service for the past month. 2) An average of 1.1 megawatts of energy are produced daily. 3) 51% of the gas that is extracted is methane. 4) Approximately five gallons of condensate are produced monthly. It is captured in a trap and automatically returned to an intermediate fill area. 5) An EPA test of exhaust emission quality from the plant combustion engine is tentatively scheduled for March. A plant operator is present from 0700-1600 on Monday-Friday. The Plant telephone number is (408) 663-6145. The Company telephone number is (213) 725-1139.	C
17689	Processing Area.	Salvaged goods are separated from other materials by the salvage operations attendant and by users. The processing of salvaged goods did not interfere with other site activities. (See slide III.1).	C
17690	Storage of Salvage.	Salvage goods are stored in an area adjacent to the active face. The location of the salvage stockpile did not interfere with other site activities. White goods were stored with their doors facing on the ground, thereby eliminating hazards to the public (See slides III.4 and III.5).	C

Inspector: M. Vazquez

CAC	SECTION	OBSERVATIONS	RESULT
17691	Removal.	Leo Fenstermaker, the private salvage operator, described the removal frequency to me. All salvaged goods are removed within a month. I did not observe any potential or existing fire or health problems associated with the stockpile.	C
17692	Non-Salvageable Items.	I did not observe the salvage of any item considered non-salvagable by this section.	C
		DISPOSAL SITE CONTROLS	
17701	Nuisance Control.	I did not observe any potential or exisiting nuisance problems not already addressed in a more specific section of this evaluation.	C
17702	Animal Feeding.	I did not see evidence of animal feeding on site.	C
17703	Fire Control.	There were roads serving as fire breaks around the working face, and around all fill areas. There was a dozer available on site to push cover material over ignited material.	C
17704	Leachate Control.	I observed no surface leachate at this site. The site has a functioning leachate collection system based at the foot of the southern canyon (see map). Leachate and spring water is measured and collected in a storage tank. It is then sprayed to control dust on site. The collection system and the method of handling leachate has the approval of the Regional Water Quality Control Board (RWQCB) Vern Jones, RWQCB, informed me by phone that there has been a problem with the off site migration of solvents. Gas tracer studies have shown "hot spots" in old fill areas and these areas will require special	C

Inspector: M. Vázquez

CAC	SECTION	OBSERVATIONS	RESULT
17704	Leachate Control (Continued)	cover. The operators of the site are in the process of drafting an action plan to address the correction of these problems. Based on my observations and discussion with the RWQCB, I have found that the operators of this facility have taken adequate measures to monitor and collect leachate and are currently in compliance with this section. (See slides III.6 and III.7)	
17705	Gas Control.	I tested for methane gas at four areas of this site with a Gas Tech, Model NP-204, and a bar hole punch. The results of the test follow: 1) There are three homes off the southern boundary of the site. The closest home was approximately 40 feet away and the furthest was 60 feet. I detected readings of 20% methane at the perimeter. Readings of greater than 10% methane constitute a violation of this section. 2) The equipment shed, adjacent to the main road, may or may not be on waste according to Al Rossi, the contracted site operator. I tested for gas approximately 100 feet south of the structure and detected 52% and 20% methane (I could not test directly adjacent to the structure because the soil was too hard to penetrate with a bar hole punch). Subsequent tests will have to be conducted with an organic vapor analyzer to determine if gas is present in the structure at concentrations greater than 1.0%. 3) I tested for gas in the area adjacent to the gatehouse and detected nothing. The gatehouse is on native soil.	V

Inspector: M. Vazquez

CAC	SECTION	OBSERVATIONS	RESULT
17704	Leachate Control (Continued)	4) I tested for gas in the area adjacent to the power plant and detected gas concentrations of 1.5 % The power plant is on native soil. Note: a) I was accompanied by Andy Wong, Staff Engineer for EMCON, and Cy Appel, Public Service Superintendant, City of Salinas Public Works Department when I tested for gas on 1/16/87. They did independent tests with their own equipment and detected high levels of gas too. Mr. Wong's Gas-Tech was equipped with an adapter that fit the southern perimeter probes. From the probes he detected methane levels of 5-54%. b) I was advised by Mary Dennis-Bannister, County of Monterey Health Department, that the site is not currently required to submit Gas Monitoring Reports to her office. c) The gas extraction plant was in operation on both inspection days. The extraction operation is discussed in Section 17688 - Volume Reduction and Energy Recovery of this evaluation.	
17706	Dust Control.	This site was not dusty the day of my inspection.	C
17707	Vector and Bird Control.	I did not observe vectors at this site. The small number of birds present did not constitute a public nuisance.	C
17708	Drainage and Erosion Control.	Wells for the gas extraction system have recently being installed in the majority of old fill surfaces. During the construction of the system, depressions were made around each well causing ponding to occur on fill surfaces. These areas need to be filled and regraded to provide proper drainage. (See slides III.12 and III.13).	V

Inspector: M. Vazquez

CAC	SECTION	OBSERVATIONS	RESULT
17709	Contact with Water.	I did not observe waste in contact with water at this site.	C
17710	Grading of Fill Surfaces.	I did not observe any problems associated with improper grading at this site. All slopes were correctly graded to account for future settlement and to promote lateral runoff. (See slides).	C
17711	Litter Control.	I did not observe any litter blown off site or any excessive accumulations of litter on site.	C
17712	Noise Control.	I did not detect noise levels that would cause a public nuisance or noise hazard.	C
17713	Odor Control.	I detected garbage and methane gas odors on site but none at the site perimeter.	C
17714	Traffic Control.	Traffic flow did not appear likely to cause a public safety hazard. I did not observe vehicles stacking onto public roads.	C
17715	Ponded Liquid.	I did not observe any engineered holding ponds at this site. This section is not applicable.	N
		DISPOSAL SITE EQUIPMENT.	
17726	General.	Equipment used at this site was consistent with what is required by the RDSI. This site handles an average of 438 tons of waste per day. The number and types of equipment were correct for operating a site of this size.	C
17727	Standby Equipment.	Backup equipment was available on site.	C

Inspector: M. Vázquez

CAC	SECTION	OBSERVATIONS	RESULT
		DISPOSAL SITE MAINTENANCE.	
17731	General.	Equipment and facility maintenance programs were effective. Facility maintenance is ongoing and equipment receives weekly maintenance.	C
17732	Operating Site Maintenance.	I did not observe any defective or deteriorating conditions that would indicate site facilities were not maintained on a regular basis. In addition, as there were fewer than three maintenance related violations, this site is in compliance with this section.	C
17733	Inspection on Completion.	This section is not applicable as this site has not closed.	N
17734	Completed Site Maintenance.	This section is not applicable as this site has not closed.	N
17735	Recording.	This section is not applicable as this site has not closed and it commenced operations in the 1950's, prior to the implementation of this standard.	N
		DISPOSAL SITE SPECIAL WASTES.	
17741	Burning Wastes.	I did not observe burning waste at this site.	C
17742	Hazardous Wastes.	I did not observe hazardous waste received at this site. There were signs at the entry road stating no hazardous waste is accepted. The salvage operation attendant, the equipment operators, and the gatekeeper keep watch for suspicious containers in the waste stream.	C
17743	Liquid Wastes.	I did not see liquid waste received at this site.	C

Inspector: M. Vázquez

CAC	SECTION	OBSERVATIONS	RESULT
17744	Dead Animals.	I did not see dead animals accepted at this site.	C
		DISPOSAL SITE REPORTS AND REVIEWS.	
17751	Periodic Site Review.	The revised permit was approved for this site on 9/8/83. A five year engineering review will be due on 9/8/88.	C

NOTES

During parts of this inspection I was accompanied by Jim Lucano, Operating Site Supervisor; Al Rossi, Site Supervisor; Cy Appel, City of Salinas Public Works; Andy Wong, EMCON Associates; and Dave Hunsinger and Mary Ann Epperson of Pacific Lighting Energy Systems.

I conducted inspection interviews with Mary Ann Dennis-Bannister, R.S., Monterey County Health Department, and Richard Alshire and Vern Jones of the Central Coast Regional Water Quality control Board.

The weather was cold and clear on both inspection dates. It rained the evening prior to inspection date 1/13/87.

Settlements are currently being made by the City of Salinas to purchase the three private residences off the southern border of the site.

Inspector: M. Vazquez

CALIFORNIA WASTE MANAGEMENT BOARD
Agenda Item #11-G
March 26 - 27, 1987

Item:

Consideration of notifying the operator of the Hunter Liggett Sanitary Landfill (Monterey County) of the Board's intent to include that facility on the State List of Non-Complying Facilities as required by Government Code Section 66796.38.

Key Issues:

- Hunter Liggett Sanitary Landfill has been evaluated for compliance with the State Minimum Standards including three on-site inspections by Board staff.

- Repeated violations of the following Minimum Standards were documented:

  17682 - Cover
  17684 - Intermediate Cover
  17707 - Vector and Bird Control
  17708 - Drainage and Erosion Control
  17742 - Hazardous Wastes
  17751 - Periodic Site Review

- Staff recommends that the Board authorize the Chief Executive Officer to notify the facility's owner of the Board's intent to add the facility to the State List of Non-Complying Facilities unless specific corrective measures are implemented within 90 days of notice.

Site Information:

Name:	Hunter Liggett Sanitary Landfill
SWIS #:	27-AA-013
Facility Type:	Class III Sanitary Landfill
Operational Status:	Open
Location:	On federal lands at the Hunter Liggett Military Reservation, Monterey County
Setting:	Land within 1,000 feet of this site is used for military training. The San Antonio River flood plain borders the site's south western end.
Permitted Volume:	35 uncompacted yards per day.
In Place Volume:	Approximately 268,800 cubic yards
Permitted Acreage:	40 acres
Facility Owner:	U.S. Army
Facility Operator:	U.S. Army
Local Enforcement Agency:	Monterey County Department of Public Health

Summary of Repeated Presley Violations

CAC Section Date	1st Inspec. May 22, 1986	2nd Inspec. Oct. 24, 1986	3rd Inspec. Jan. 12 & 14, 1986
17682 - Cover	Violation	Comply	Violation
17684 - Intermediate Cover	Comply	Violation	Violation
17707 - Vector and Bird Control	Violation	Violation	Violation
17708 - Drainage and Erosion Control	Comply	Violation	Violation
17742 - Hazardous Wastes	Violation	Indeterminate	Violation
17751 - Periodic Site Review	Violation	Violation	Violation

Background:

Hunter Liggett Sanitary Landfill is an existing 40 acre, Class III (new classification) landfill which is permitted to accept 35 uncompacted yards of waste per day. Disposal operations began in 1954. A Solid Waste Facility Permit was issued on January 4, 1978. According to the most recent permit, January 4, 1978 the disposal site can be used an indefinite period of time.

Types of wastes received at this site include:

a) Residential and Commercial
b) Construction and Demolition
c) Some infectious Waste

The following actions are prohibited at the site.

a) Disposal of hazardous wastes
b) Burning
c) Disposal of any liquid wastes
d) scavenging

The Facility is owned and operated by the United States Army

Background: (Cont.)

The site is within the boundaries of Fort Hunter Liggett. There are no structures within 1,000 feet of the site. The San Antonio River flood plain borders the site's southwestern end. Surrounding land is vegetated with native trees and grasses, and is used for military training.

Related Issues:

This site has a Calderon Priority Ranking of Number Two. The site owners informed the Central Coast Regional Water Quality Control Board (RWQCB) of their intent to close the site in 1987. The Regional Water Quality Control Board has advised the site operators to either promptly prepare for closure or begin revising Waste Discharge Requirements (WDR) per Subchapter 15 mandates. A landfill closure report has not been submitted to the RWQCB as of 3/09/87.

In the past, waste was deposited in 18 foot deep trenches and there was some concern that the shallow water table would come in contact with the waste. According to Richard Aleshire, Central Coast Regional Water Quality Control Staff Engineer, subsurface records gave a false indication of depth to groundwater and depth to waste. This is because different elevations were used when taking measurements. It has not been confirmed that deposited waste is in contact with subsurface water. The closure plan may require that this issue be further researched.

Past Compliance:

For the period between May 19, 1985 and May 19, 1986, a year before the Presley evaluation started, one inspection by the Local Enforcement Agency (LEA) was conducted. No violations were noted during the inspection.

Recent Compliance:

During the California Waste Management Board Evaluation period for Hunter Liggett Sanitary Landfill (May 19, 1986 to January 15, 1987) there were two Local Enforcement Agency inspections, available for staff review. The most recent being on September 11, 1986. Three violations were noted.

They are:

17658 - Site Security
17682 - Cover
17742 - Hazardous Wastes

Recent Compliance (Cont.)

A chronology of events occurring during the CWMB evaluation is presented below:

May 19, 1986

The first of three inspections by the CWMB was conducted by Pamela Badger. Sections in violation were as follows:

17616 - Report of Disposal Site Information
17658 - Site Security
17682 - Cover
17707 - Vector and Bird Control
17742 - Hazardous Wastes
17751 - Periodic Site Review

Sections with an Indeterminate status were as follows:

17628 - General Design Parameters
17636 - Weight/Volume Records
17646 - Availability

All other CAC Sections were found to be either in compliance or not applicable.

August 5, 1986

Results of the first inspection were transmitted to the operator and the LEA (See attachment I). The cover letter described the nature of our evaluation program and the consequences of noncompliance.

October 20, 1986

The second of the three inspections were conducted by Herbert Berton.

Sections in violation were as follows:

17684 - Intermediate Cover
17707 - Vector and Bird Control
17708 - Drainage and Erosion Control
17751 - Periodic Site Review

Sections with an Indeterminate status were as follows:

17742 - Hazardous Wastes
17709 - Contact with Water

Recent Compliance (Cont.)

All other CAC Sections were found to be either in compliance or not applicable.

December 1, 1986

The results of the second CWMB inspection were transmitted to the operator and the LEA (See Attachment 2). The cover letter again explained the nature of the evaluation program and the consequences of non-compliance.

December 9, 1986

Board staff sent a letter to the North Coast Toxic Substances Control Division advising them that Calcium Hydride was discovered during the October 20 Presley Inspection. Calcium hydride is listed as extremely hazardous and reactive (See attachment #3).

January 15, 1987

The third Presley inspection was conducted by Martha Vazquez. Sections in violation were as follows:

17682 - Cover	17710 - Grading of Fill Surfaces
17684 - Intermediate Cover	17711 - Litter Control
17707 - Vector/Bird Control	17732 - Operating Site Maintenance
17708 - Drainage/Erosion Control	17742 - Hazardous Wastes
17709 - Contact with Water	17751 - Periodic Site Review

All other CAC Sections were found to be either in compliance or not applicable.

March 5, 1987

Results of the third inspection were transmitted to the operator and LEA (See attachment #4). The cover letter reiterated the nature of our evaluation program. It also informed the operator and LEA of staff's intent to have the Board consider placing Hunter Liggett Sanitary Landfill on the State's List of Non-Complying Facilities at its March meeting unless corrective measures are taken.

Summary:

The Hunter Liggett Sanitary Landfill has been evaluated by the California Waste Management Board staff for compliance with State Minimum Standards. All pertinent information including data from three separate California Waste Management Board staff inspections have been reviewed. Continued violations for the following sections have been documented.

17682 - Cover
17684 - Intermediate Cover
17707 - Vector and Bird Control
17708 - Drainage and Erosion Control
17742 - Hazardous Wastes
17751 - Periodic Site Review

Board Options

Notify the operator of the Board's intent to place Hunter Liggett Sanitary Landfill on the State List of Non-Complying facilities unless the following specified actions are taken within 90 days of notice.

17682 Cover

1. Develop and implement a program to prevent Class III Waste from being disposed of in the demolition area of the site.

2. Place cover material over all wood waste and putrescible material that has been improperly disposed of in the demolition area.

17684 Intermediate Cover

Submit a working plan specifying dates for placement of at least 12 inches of cover material over intermediate fill surfaces that have been identified as having inadequate cover.

17707 Vector and Bird Control

Establish and implement a work plan to control and prevent the harborage of the excessive number of ground squirrels currently infesting the site. The plan would include eradication of ground squirrels and their burrows.

17708 Drainage and Erosion Control

Repair the eroded gullies on the slopes just west of the active trench. Re-cover any additional areas of erosion where waste has been exposed.

17709 Contact with Water

Establish and implement an action plan to determine if deposited waste is or is not in contact with groundwater. If it is confirmed that deposited waste is in contact with groundwater, a work plan should be submitted along with a timetable for implementing actions to correct this condition.

17742 Hazardous Waste

Establish and implement a work plan to prevent hazardous waste from being disposed of at this site.

17751 Periodic Site Review

Commence Periodic Site Review to determine if any significant changes have occurred.

The operator must develop a compliance schedule that is mutually agreed upon by the Board and the Local Enforcement Agency for completion of the required actions outlined in Option #1. Failure to meet any deadline contained in the compliance schedule will result in a recommendation by staff that the Board place the site on the State List of Non-Complying Facilities. In no case will such a recommendation be made in less than 90 days. Verification of all deadlines will be made through additional staff inspections as necessary.

Option #2

Direct the operator to establish a schedule for bringing the site into compliance with State Minimum Standards.

Under this option, the operator must submit a compliance schedule to the Board within 30 days stating specific dates for initiating and completing the required actions outlined in Option #1 above. If an agreeable schedule is not received by the Board within 30 days, and/or if dates specified for implementing and completing the required actions are not met, this option authorizes the intent to place the site on the State List of Non-Complying Facilities.

Option #3

No Action.

Notification:

The site operator and LEA have been invited to present to the Board at its March Meeting any information relevant to the matter under consideration.

Recommendation:

Based on the information available to staff at the time of the report, staff recommends that the Board implement Option #1.

Hunter Liggett Sanitary Landfill

Attachments

#1 1st CWMB Inspection Report, May 22, 1986

#2 2nd CWMB Inspection Report, October 24, 1986

#3 Staff's Letter to Toxics, December 9, 1986

#4 3rd CWMB Inspection Report, January 12 & 14, 1987

Working File

STATE OF CALIFORNIA

GEORGE DEUKMEJIAN, Governor

CALIFORNIA WASTE MANAGEMENT BOARD
1020 NINTH STREET, SUITE 300
SACRAMENTO, CA 95814

1st

AUG 05 1986

To: Joseph Cochran, Chief
Environmental and Natural Resources
Facilities Engineering
Fort Ord, CA 93941

Subject: Report of inspection: Hunter Liggett Sanitary Landfill 27-AA-13

Government Code Section 66796.38 requires the California Waste Management Board (Board) to conduct inspections of solid waste facilities for the purpose of evaluating compliance with the State Standards for Solid Waste Handling and Disposal (Title 14. California Administrative Code, Division 7 Chapter 3, commencing with section 17200). Under this program, each facility will be inspected at least three separate times. As you are aware by now, staff has already conducted one of these inspections at the subject facility. The date of that inspection was May 19, 1986. A report resulting from the recent inspection is enclosed. If photographs are referred to in the inspection report, copies will be obtainable upon written request.

The goal of our inspection program is to verify compliance with each of the State Minimum Standards, not merely to find violation(s) of these standards. In order to achieve this we will, as I stated above, be inspecting each facility at least three times. This will provide the following advantages over the previous inspection techniques:

* The program will provide greater fairness to operators of facilities by reducing the possibility that one operator will be inspected under adverse conditions and another under favorable conditions.

* The program will allow for evaluation of conditions, which show seasonal variations such as effectiveness of leachate control systems, vectors, dust, etc.

* The program will provide a track record of compliance which will be used in evaluating standards for which a single violation may not be sufficient reason to place the facility on the State List of Non-Complying Facilities when the facility is generally in compliance with that standard, i.e., the daily cover standard.

Although we do not intend to provide advance notice of the inspection dates to operators, the Local Enforcement Agency (LEA) will be notified of those dates, and will be invited to accompany our staff on the inspection.

If, after three inspections, your facility continues to be operating in violation of one or more of the State Minimum Standards you will be notified of this finding by certified letter. A copy of that letter will be sent to the LEA. After 90 days or upon notification of correction of all violations(s), Board staff will reinspect the facility. If the facility is still in violation, staff will notify you and the LEA, by certified letter of staff's intent to recommend that the Board place the facility's name on the State List of Non-Complying Facilities at a regularly scheduled meeting of the Board. Should the Board place the facility on that list, State law (Government Code 66796.39) requires that the LEA develop a compliance schedule for correction of the violation(s). If compliance is not achieved within one year, Government Code section 66796.39 directs LEAs to revoke facility operating permits. If the facility is closed or abandoned, staff will recommend that the LEA issue a notice of violation and an order to correct the violations. That Notice and Order will also notify you or the owner of the facility that State law provides that "the unremedied condition of the facility is prima facie evidence of negligence, and in any action for damages against the owner of the property for injury caused by the unremedied condition, the burden of proving the injury was not caused by an unremedied condition shall be on the owner of the property".

If you have any questions regarding the program, please contact me at (916) 322-1769.

Sincerely,

John K. Bell, Manager
Monitoring Section

cc: Maryann Dennis-Bannister, Monterey County Health

mea

CALIFORNIA WASTE MANAGEMENT BOARD

DISPOSAL SITE
EVALUATION REPORT

Facility Name: Hunter Liggett Sanitary Landfill

Facility ID No.: 27-AA-13

Name of Inspector: Pamela Badger

Inspection Dates: May 19, 1986

Signature: P. Badger

CAC Section:	Observations:	Conclusions:
Disposal Site Information:		
17616 Report of Disposal Site Information	The Report of Disposal Site Information (RDSI) does not reflect the site groundwater monitoring program. The RDSI states that "no controls, monitoring, collection, and removal measures exist and none are proposed". However, groundwater monitoring wells have been installed and are to be sampled quarterly. Details on the monitoring system should be added to the RDSI.	Violation
Design Responsibility:		
17626 Design Responsibility	This section applies to new sites only.	N/A
17627 Ultimate Use	The ultimate use for this site is a return to training grounds.	Comply
17628 General Design Parameters	The Report of Disposal Site Information (RDSI) describes trench depths of eighteen feet. The groundwater level is described as 10-12 feet deep in the subsurface records indicating that buried waste may be in contact with the water table. Either the RDSI is incorrect or waste is being disposed below the water table. The operator should determine which of these possibilities is the case. An incorrect RDSI will add to the violation in Section 17616, and waste below the water table will result in violation of Section 17709, Contact with Water, or Section 17628, Public Health Design Parameters.	Indeterminate

Section Manager JXB

Facility Name: Hunter Liggett Sanitary Landfill

Facility ID No.: 27-AA-13

Name of Inspector: Pamela Badger

Inspection Dates: May 19, 1986

Signature: P. Badger

CAC Section:	Observations:	Conclusions:
17629 Public Health Design Parameters	The site design accounts for all factors in Section 17629.	Comply
17636 Weight/Volume Records	Weight records were estimated and kept at the Fort Ord Army Base. The estimates for 1985 was 164 tons per month, every month. It is not likely that this unvarying estimate is accurate to 10% every month. The site should consider using a more careful method of waste tonnage or volume estimation. Subsequent inspectors should check to see if a more accurate method of estimating waste flow is being implemented.	Indeterminat
17637 Subsurface Records	Subsurface records consisted of a map with cut areas dragrammed and depth of cuts described by elevation.	Comply
17638 Special Occurrences	Because this site does not receive 100 cubic yards or more of wastes per operating day, it is not required to keep a log of special occurrences.	N/A
17639 Inspection of Records	Records were available through William Payton of the camp Engineering Department.	Comply
Disposal Site Personnel:		
17646 Availability	There is one equipment operator at this site. I was not able to determine if one worker was adequate or not. See site security, Section 17658.	Indeterminar

17647 Pams original rept. C

Facility Name: Hunter Liggett San. Landfill **Facility ID No.:**27-AA-13

Name of Inspector: Pamela Badger **Inspection Dates:**5/19/86

Signature: P. Badger

CAC Section:	Observations:	Conclusions:
17648 Supervision	I did not detect any conditions that caused me to feel that this site was improperly supervised.	Comply
17649 Site Attendant	This site is not open to the public except by written permit.	Comply
Disposal Site Improvements:		
17656 Identification Signs	This site had identification signs on the main access road.	Comply
17657 Entry Signs	This site was not open to the public. (Please see notes section on the last page).	N/A
17658 Site Security	A road leads into the landfill on the North side of the property. No gate has been constructed on this road, allowing 24-hour access to the site. In addition, there is evidence of unauthorized dumping in the construction debris area. See slides #1.12, 1.13 and 1.15. The equipment operator says sometimes unauthorized persons dumped at noon, while he is absent.	Violation
17659 Access Roads	Access roads were either dirt or paved and in good condition.	Comply
17660 Internal Roads	Internal roads were dirt and in passible condition.	Comply
Disposal Site Health and Safety:		
17666 Sanitary Facilities	Sanitary facilities are not available on the site but are available for the equipment operator a short distance away.	Comply

Facility Name: Hunter Liggett San. Landfill **Facility ID No.:**27-AA-13

Name of Inspector: Pamela Badger **Inspection Dates:**5/19/86

Signature: P. Badger

CAC Section:	Observations:	Conclusions:
17667 Water Supply	A drinking water supply is not available on the site but is available to the equipment operator a short distance away.	Comply
17668 Communications Facilities	Communication facilities are not available on the site but are available a short distance away.	Comply
17669 Lighting	This site does not operate during hours of darkness.	Comply
17670 Personnel Health And Safety	The Local Enforcement Agency does not require any specific safety equipment.	Comply
Disposal Site Operations:		
17676 Confined Unloading	Waste was unloaded into one end of a confined trench.	Comply
17677 Spreading and Compacting	Waste was spread and compacted.	Comply
17678 Slopes and Cuts	The slope of the working face allowed effective compaction. The depth of cuts was acceptable to the Enforcement Agency.	Comply
17679 Final Site Face	Final areas were of acceptable appearance and were not steeper than 1 3/4:1.	Comply
17680 Stockpiling	Stockpiled materials did not interfere with operations.	Comply

Facility Name: Hunter Liggett San. Landfill **Facility ID No.:**27-AA-13

Name of Inspector: Pamela Badger **Inspection Dates:**5/19/86

Signature: P. Badger

CAC Section:	Observations:	Conclusions:
17681 Availability of Cover	Cover was available on site.	Comply
17682 Cover	This was a daily cover site. However, the waste was not fully covered (approximately 75% covered) and cover was not the required six inch depth. See slides 1.3, 1.4, 1.18 and 1.19.	Violation
17683 Performance Standards	This is not a performance standards site.	N/A
17684 Intermediate Cover	There was no exposed waste in intermediate cover areas.	Comply
17685 Final Cover	There was no exposed waste in final cover areas. Final cover depth is reported to be two feet by Mr. Bill Payton of the engineering department.	Comply
17686 Scavenging	I did not observe any scavenging.	Comply
17687 Salvaging Permitted	This site had no salvaging operations.	N/A
17688 Volume Reduction and Energy Recovery	This site had no volume reduction or energy recovery operations.	N/A
17689 Processing Area	This site had no salvaging operations.	N/A
17690 Storage of Salvage	This site had no salvage operation.	N/A

Facility Name: Hunter Liggett Sanitary Landfill **Facility ID No.:** 27-AA-13

Name of Inspector: Pamela Badger **Inspection Dates:** May 19, 1986

Signature: P. Badger

CAC Section:	Observations:	Conclusions:
17691 Removal	This site had no salvage operation.	N/A
17692 Non-Salvageable Items	I did not observe the salvaging of any items considered non-salvageable by this section.	Comply
Disposal Site Controls:		
17701 Nuisance Control	No conditions were observed which would be expected to create a nuisance.	Comply
17702 Animal Feeding	No food animals were observed feeding on the waste.	Comply
17703 Fire Control	There is a fire department on the base.	Comply
17704 Leachate Control	The manager of the sewage plant is responsible for quarterly monitoring well and surface leachate checks. The site is preparing to close and will have to comply with Subchapter 15 closure requirements, according to Richard Aleshire of the Regional Water Quality Control Board.	Comply
17705 Gas Control	There were no inhabited structures within well over 1,000 feet of this site, so I did not test for landfill gas migration.	Comply
17706 Dust Control	This site was a little dusty, but I did not consider dust at the working face to be of nuisance proportion. Subsequent inspectors who evalutate the site during dry seasons should check carefully for dust control.	Comply

Facility Name: Hunter Liggett Sanitary Landfill
Facility ID No.: 27-AA-13
Name of Inspector: Pamela Badger
Inspection Dates: May 19, 1986

Signature: P. Badger

CAC Section:	Observations:	Conclusions:
17707 Vector and Bird Control	The area was infested with ground squirrels. Their burrows were scattered along the northern edge of the trench. I saw squirrels in the waste and evidence that they carried waste back to their burrow area to eat it. These animals should be removed. (See slides #1.6 -1.9).	Violation
17708 Drainage and Erosion Control	The site was properly drained and there was no significant erosion.	Comply
17709 Contact with Water	No waste was in contact with water.	Comply
17710 Grading of Fill Surfaces	Fill surfaces were graded to promote lateral runoff. (The slopes were so gradual that this site will probably have to increase them upon closure).	Comply
17711 Litter Control	There was no excess litter.	Comply
17712 Noise Control	This site was not excessively noisy.	Comply
17713 Odor Control	No excessive odors were observed.	Comply
17714 Traffic Control	This site was not heavily used. Traffic stacking was not a problem.	Comply
17715 Ponded Liquid	There was no ponded liquid.	Comply

Facility Name: Hunter Liggett San. Landfill **Facility ID No.:**27-AA-13

Name of Inspector: Pamela Badger **Inspection Dates:**5/19/86

Signature: Pamela Badger

CAC Section:	Observations:	Conclusions:
Disposal Site Equipment:		
17726 General	Sufficient equipment to run this site is available on base. Equipment appeared to be in good working order during this inspection.	Comply
17727 Standby Equipment	Standby equipment was available on base.	Comply
Disposal Site Maintenance:		
17731 General	Equipment was maintained on a daily and quarterly basis. There was no written preventive site maintenance program, but I did not observe any conditions suggesting a lack of preventive maintenance.	Comply
17732 Operating Site Maintenance	As there were fewer than three maintenance related sections in violation, this site complies with Section 17732.	Comply
17733 Insp. on Completion	This is an operating site.	N/A
17734 Completed Site Maintenance	This is an operating site.	N/A
17735 Recording	This is a grandfathered site.	N/A
Disposal Site Special Wastes:		
17741 Burning Wastes	I did not observe any burning wastes.	Comply

Facility Name: Hunter Liggett San. Landfill **Facility ID No.:**27-AA-13

Name of Inspector: Pamela Badger **Inspection Dates:**5/19/86

Signature: P. Badger

CAC Section:	Observations:	Conclusions:
17742 Hazardous Wastes	I observed potentially hazardous wastes at two locations at this landfill. There were 15-20 cans labelled lube oil or wax remover at the working face. Most of these cans still have liquid in them - I would say approximately one to three inches in the bottom. Also, there were a couple of paint or lacquer cans at the demolition fill area with two to four inches of residue in them. Some of this material was leaking out onto the ground. Subsequent inspectors should evaluate this landfill carefully for Section 17742. If found, potentially hazardous waste should be isolated and the Department of Health Services called immediately. (See slides #1.3, 1.10, 1.11, 1.15 and 1.16).	Violation
17743 Liquid Wastes	This site accepted no liquid wastes.	Comply
17744 Dead Animals	I did not observe any dead animal disposal.	Comply
Disposal Site Reports and Reviews:		
17751 Periodic Site Review	This site is overdue for its five-year engineering review.	Violation

Notes:

I was accompanied by Ms. Mary Ann Dennis-Bannister of the Monterey County Health Department on this inspection.

The hazardous waste prohibition sign had fallen down and should be put back up.

SWIS-09 (REV. 1/85)

NOTICE OF INSPECTION DISPOSAL SITE

LOCAL ENFORCEMENT AGENCY: Monterey County Environmental Health

FACILITY FILE NUMBER	FACILITY CODE	INSPECTION DATE	T-OUT	TOTAL TIME
27-AA-[illegible]	[illegible]	5-12-86	T-IN	4 hrs

FACILITY NAME: Hunter Liggett Sanitary Landfill

FACILITY LOCATION: Hunter Liggett Army Base

INSPECTOR: P. Badger

ALSO PRESENT: M. Dennis-Bannister

RECEIVED BY:

Operator _____

Owner _____

Comments: The Report of Disposal Site Info (RDSI) does not describe the groundwater monitoring system. Site was not secure. Evidence of unauthorized dumping. Cover was not complete and not of adequate 6" depth. The area was infested with squirrels. This site had potentially hazardous wastes being disposed. Site was overdue for a 5-year permit and site review.

Ind = indeterminate status

	*V	C
(3011) RECORDS		
☒ ACCURATE WEIGHT/VOLUME RECORDS MAINTAINED 17636		IND
☐ ADEQUATE SUBSURFACE RECORDS MAINTAINED 17637		
☐ LOG OF SPECIAL OCCURRENCES MAINTAINED 17638		
☐ RECORDS AVAILABLE FOR INSPECTION 17639		
(3021) PERSONNEL		
☒ ADEQUATE NUMBER OF QUALIFIED PERSONNEL AVAILABLE 17646		IND
☐ PERSONNEL ADEQUATELY TRAINED 17647		
☐ ADEQUATE SUPERVISION PROVIDED 17648		
☐ SITE ATTENDANT AVAILABLE FULL-TIME OR AS DETERMINED BY LEA 17649		
(3031) SIGNS		
☐ IDENTIFICATION SIGNS AT EACH POINT OF ACCESS 17656		
☐ ENTRY SIGN STATES FEES, HOURS OF OPERATION, WASTES ACCEPTED/NOT ACCEPTED 17657		
☐ NON-HAZARDOUS UNATTENDED SITES HAVE SIGN WARNING USERS OF UNAVAILABILITY OF COMMUNICATION FACILITIES 17658		
(3041) SECURITY		
☒ ADEQUATE PERIMETER SECURITY, HAZARDOUS AREAS FENCED AND IDENTIFIED 17659		
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(3252) LITTER (P)		
☐ LITTER NOT ALLOWED TO MIGRATE OFF-SITE 17693		
(3261) NOISE		
☐ NOISE CONTROL ADEQUATE 17712		
(3271) ODOR		
☐ ODOR CONTROL ADEQUATE 17713		
(3272) ODOR (P)		
☐ AMBIENT AIR AT OR BEYOND FACILITY BOUNDARY IS NOT ODOROUS 17683		

	V	C
(3281) TRAFFIC		
☐ TRAFFIC CONTROL ADEQUATE WITHIN SITE. TRAFFIC MINIMIZES INTERFERENCE, SAFETY PROBLEMS, AND STACKING ON PUBLIC ROADS 17714		
(3291) EQUIPMENT		
☐ EQUIPMENT ADEQUATE IN TYPE, CAPACITY, AND NUMBER, AND IS ADEQUATELY MAINTAINED 17716		
☐ STANDBY EQUIPMENT AVAILABLE TO COMPLY WITH SEC. 17682 AND OTHER SECTIONS 17717		
(3301) MAINTENANCE		
☐ EFFECTIVE MAINTENANCE PROCEDURES AND PROGRAMS DEVELOPED AND UTILIZED 17721		
☐ ADEQUATE MONITORING AND REPAIR OF DETERIORATED CONDITIONS 17722		
(3311) CLOSURE		
☐ AFTER CLOSURE, IF LEACHATE, EXTENSIVE SURFACE CRACKING OR SETTLEMENT OCCURS, THE OWNER SHALL NOTIFY LEA AND SHALL MONITOR AND REPAIR SITE FOR A PERIOD OF 5 YEARS OR LONGER 17724		
☐ UPON SITE CLOSURE, DETAILED DESCRIPTION MUST BE FILED WITH THE LEA AND WITH THE COUNTY RECORDER 17723		
(3321) SPECIAL WASTES		
☐ BURNING WASTES IMMEDIATELY SPREAD AND EXTINGUISHED IN SAFE AREA 17741		
☒ SITE ACCEPTS ONLY APPROVED HAZARDOUS WASTES AND TAKES PRECAUTIONS TO ELIMINATE OR CONTROL HARMFUL DUSTS, FUMES, MISTS, VAPORS, OR GASES 17742		
☐ LIQUID WASTES APPROVED BY RWQCB, LOCAL HEALTH ENTITY AND LEA 17743		
☐ DEAD ANIMALS ALLOWED BY LOCAL REGULATIONS 17744		
(3331) OTHER		
☒ RDSI 17616-violation; 17623 General Design Guidelines - Ind; 17751 Periodic Site Review - Violation		

*V = Violation
C = Compliance

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DISTRIBUTION: WHITE — CWMB YELLOW — OPERATOR PINK — LEA

Working File

STATE OF CALIFORNIA

GEORGE DEUKMEJIAN, Governor

CALIFORNIA WASTE MANAGEMENT BOARD
1020 NINTH STREET, SUITE 300
SACRAMENTO, CA 95814

DEC 0 1 1986

2nd

To: Mr. Joseph Cochran, Chief
Environmental and Natural Resources
Facility Engineering
Fort Ord, CA 93941

Subject: Report of inspection: Hunter Liggett Sanitary Landfill 27-AA-13

Government Code Section 66796.38 requires the California Waste Management Board (Board) to conduct inspections of solid waste facilities for the purpose of evaluating compliance with the State Standards for Solid Waste Handling and Disposal (Title 14. California Administrative Code, Division 7 Chapter 3, commencing with section 17200). Under this program, each facility will be inspected at least three separate times. As you are probably aware, the subject facility received its second inspection on October 20, 1986. Enclosed please find the Evaluation Report resulting from this second inspection. Copies of photographs or slides referred to in the report are available from the Board upon written request.

The goal of our inspection program is to verify compliance with each of the State Minimum Standards, not merely to find violation(s) of these standards. In order to achieve this we will, as I stated above, be inspecting each facility at least three times. This will provide the following advantages over the previous inspection techniques:

* The program will provide greater fairness to operators of facilities by reducing the possibility that one operator will be inspected under adverse conditions and another under favorable conditions.

* The program will allow for evaluation of conditions, which show seasonal variations such as effectiveness of leachate control systems, vectors, dust, etc.

* The program will provide a track record of compliance which will be used in evaluating standards for which a single violation may not be sufficient reason to place the facility on the State List of Non-Complying Facilities when the facility is generally in compliance with that standard, i.e., the daily cover standard.

Although we do not intend to provide advance notice of the inspection dates to operators, the Local Enforcement Agency (LEA) will be notified of those dates, and will be invited to accompany our staff on the inspection.

If, after the third inspection, your facility continues to be operating in violation of one or more of the State Minimum Standards you will be notified of this finding by certified letter. A copy of that letter will be sent to the LEA. After 90 days or upon notification of correction of all violations(s), Board staff will reinspect the facility. If the facility is still in violation, staff will notify you and the LEA, by certified letter of staff's intent to recommend that the Board place the facility's name on the State List of Non-Complying Facilities at a regularly scheduled meeting of the Board. Should the Board place the facility on that list, State law (Government Code 66796.39) requires that the LEA develop a compliance schedule for correction of the violation(s). If compliance is not achieved within one year, Government Code section 66796.39 directs LEAs to revoke facility operating permits. If the facility is closed or abandoned, staff will recommend that the LEA issue a notice of violation and an order to correct the violations. That Notice and Order will also notify you or the owner of the facility that State law provides that "the unremedied condition of the facility is prima facie evidence of negligence, and in any action for damages against the owner of the property for injury caused by the unremedied condition, the burden of proving the injury was not caused by an unremedied condition shall be on the owner of the property".

If you have any questions regarding the program, please contact me at (916) 322-1769.

Sincerely,

John K. Bell, Manager
Monitoring Section

Enclosure

cc: Walter Wong, Monterey County Environmental Health

mea

CALIFORNIA WASTE MANAGEMENT BOARD

DISPOSAL SITE
EVALUATION REPORT

Facility Name: Hunter-Liggett S.S. **Facility ID No.:** 27-AA-13

Name of Inspector: Herbert Berton **Inspection Dates:** 10/20/86

Signature: Herbert Berton

CAC Section:	Observations:	Conclusions:
Disposal Site Information:		
17616 Report of Disposal Site Information	The Current RDSI describes the existing operation.	Comply
Design Responsibility:		
17626 Design Responsibility	This standard applies to new facilities only.	N/A
17627 Ultimate Use	The RDSI states that this site will be used as training grounds upon site closure.	Comply
17628 General Design Parameters	This site pre-exists the implementation of this standard.	N/A
17629 Public Health Design Parameters	The design meets the criteria listed in Section 17629	Comply
17636 Weight/Volume Records	I reviewed the monthly volume records which were kept at the Camp Engineering Department. The average volume for period of July 1985 to June 1986 was 1420 cubic yards per month.	Comply

Section Manager [illegible]

Facility Name: Hunter-Liggett S.S. Facility ID No.:27-AA-13

Name of Inspector: Herbert Berton Inspection Dates:10/20/86

Signature: Herbert Berton

CAC Section:	Observations:	Conclusions:
17637 Subsurface Records	I reviewed the subsurface records which consisted of a map with diagrams of cut areas and depth of cuts described by elevation. Subsurface records were kept at the Camp Engineering Department.	Comply
17638 Special Occurrences	Due to the fact that this site did not receive 100 cubic yards or more of wastes per day, it was not required to keep a log of special occurrences.	N/A
17639 Inspection of Records	All records were kept at the Camp Engineering Department and were available during business hours.	Comply
Disposal Site Personnel:		
17646 Availability	The site had one qualified person to properly operate the facility.	Comply
17647 Training	I was told by William Dayton, Facility Engineer, there is no formal training program and only experienced, qualified personnel are hired. I observed site personnel working and no activity was restricted due to lack of experience.	Comply
17648 Supervision	William Dayton, Facility Engineer, oversees the operation of the landfill. I did not see any conditions I felt were due to a lack of supervision.	Comply
17649 Site Attendant	This site is not open to the public except by written permit.	Comply

Facility Name: Hunter-Liggett S.S. Facility ID No.:27-AA-13

Name of Inspector: Herbert Berton Inspection Dates:10/20/86

Signature: Herbert Berton

CAC Section:	Observations:	Conclusions:
Disposal Site Improvements:		
17656 Identification Signs	The site had identification signs on the main access road.	Comply
17657 Entry Signs	As this site is not open to the public, no entry signs are required. See Notes section on last page. (See photo #II-1 through II-3).	N/A
17658 Site Security	The road leading into the landfill on the north side of the property does not have a gate. This allows 24 hours access to the site. (See photo #II-4).	Violation
17659 Access Roads	Roads were smooth and passable and allowed good access to the site. I did not see excessive dust or tracking of material onto adjacent paved public roads.	Comply
17660 Internal Roads	Internal roads were passable and in such a condition that vehicle access and unloading were not impeded. Roads were suitably signed.	Comply
Disposal Site Health and Safety:		
17666 Sanitary Facilities	Sanitary facilities were not available on site but were available a short distance away in the barracks.	Comply
17667 Water Supply	The equipment operator supplied his own potable water.	Comply
17668 Communication Facilities	The nearest working telephone is approximately 1/4 of a mile away in the barracks. See Notes: Section on last page. (See photo II-5).	Comply

Facility Name: Hunter-Liggett S.S. Facility ID No.:27-AA-13

Name of Inspector: Herbert Berton Inspection Dates:10/20/86

Signature: Herbert Berton

CAC Section:	Observations:	Conclusions:
17669 Lighting	This site did not operate during hours of darkness.	Comply
17670 Personnel Health and Safety	The LEA does not require any specific safety equipment.	Comply
Disposal Site Operations:		
17676 Confined Unloading	The unloading area was properly confined to one end of the trench. (See photo II-7, II-8).	Comply
17677 Spreading and Compacting	I observed that the waste was properly spread and compacted by a caterpiller. (See photo II-20, II-21).	Comply
17678 Slopes and Cuts	The slope of the working face was such that affective compaction of waste was maintained. The measured angle was 6 degrees which is equal to a ratio of 9.52:1, horizontal to vertical as measured by a clinometer.	Comply
17679 Final Site Face	The final exterior surface appears neat and finished and was of proper slope. The measured slope was 25 degrees, which is equal to a ratio of 2.15:1, horizontal to vertical as measured by a clinometer.	Comply
17680 Stockpiling	Stockpiled material was kept out ot the way and did not hinder traffic movement or daily operations. The stockpiles were located immediately above the trench and ran along both sides. (See photo I II-6).	Comply

Facility Name: Hunter-Liggett S.S. **Facility ID No.:**27-AA-13

Name of Inspector: Herbert Berton **Inspection Dates:**10/20/86

Signature: Herbert Berton

CAC Section:	Observations:	Conclusions:
17681 Availability of Cover	Cover came from the excavation of the trench that is currently being used and was of such an amount that daily cover can be applied for the life of the active trench.	Comply
17682 Cover	Waste was covered at the required frequency. Photographs taken in the morning and the end of the operating day document this. (See photo II-7 through II-11).	Comply
17683 Performance Standards	This was not a performance standard site.	N/A
17684 Intermediate Cover	Areas identified by a diagram of the site as intermediate cover had exposed waste. These areas were located east of the San Antonio River in the inactive trenches between well #3 and well #4. (See photo II-12 through 11-14).	Violation
17685 Final Cover	There were no areas of final cover.	N/A
17686 Scavenging	I did not observe any scavenging.	Comply
17687 Salvaging Permitted	The site had no salvaging operations.	N/A
17688 Volume Reduction and Energy Recovery	Volume Reduction and Energy Recovery were not observed.	Comply
17689 Processing Area	The site had no salvaging operations.	N/A

Facility Name: Hunter-Liggett S.S. Facility ID No.:27-AA-13

Name of Inspector: Herbert Berton Inspection Dates:10/20/86

Signature: Herbert Berton

CAC Section:	Observations:	Conclusions:
17690 Storage of Salvage	The site had no salvaging operations.	N/A
17691 Removal	The site had no salvaging operations.	N/A
17692 Non-Salvageable Items	I did not observe the salvage of any items defined as non-salvageable by this section.	Comply
Disposal Site Controls:		
17701 Nuisance Control	The operation did not appear to be likely to cause a public nuisance.	Comply
17702 Animal Feeding	I did not observe animals feeding on waste.	Comply
17703 Fire Control	There is a fire department on base. I did not observe any fires or see evidence of recent fires.	Comply
17704 Leachate Control	The manager of the sewage plant monitors the groundwater wells monthly for depth to groundwater as required by the Regional Water Quality Control Board and reports the figures to Joseph Cochran, Chief, Environmental and Natural Resources, at Fort Ord. The sewage plant manager also monitors for surface leachate. I observed no leachate on site.	Comply
17705 Gas Control	Due to the isolated nature of the site I had no cause to believe that landfill gas would be a problem.	Comply

Facility Name: Hunter-Liggett S.S. **Facility ID No.:**27-AA-13

Name of Inspector: Herbert Berton **Inspection Dates:**10/20/86

Signature: Herbert Berton

CAC Section:	Observations:	Conclusions:
17706 Dust Control	There is a water truck on base that is used to control dust.	Comply
17707 Vector and Bird Control	The area around the active trench was infested with ground squirrels. The burrows were scattered through the site. I observed squirrels feeding on the waste. Squirrel abatement should be initiated to control this problem. (See photo #II-15 and II-16).	Violation
17708 Drainage and Erosion Control	There was some erosion east of the San Antonio River and north of Well #4 which had exposed waste. (See photo II-17).	Violation
17709 Contact with Water	Data collected from monthly sampling of groundwater wells indicate groundwater levels from 7' 4" - 12' 11" in well 5 which is closest to the active trench. The RDSI states that trench depths eighteen feet at the deepest point. This date indicates that buried waste is in control with groundwater and is therefore in violation of Section 17709.	Violation
17710 Grading of Fill Surfaces	Grading accounted for settlement and promoted lateral runoff.	Comply
17711 Litter Control	I did not observe any accumulations of litter I felt could lead to a litter nuisance.	Comply
17712 Noise Control	Due to the isolated nature of this site I did not observe any condition which I felt could lead to a noise nuisance.	Comply

Facility Name: Hunter-Liggett S.S. Facility ID No.:27-AA-13

Name of Inspector: Herbert Berton Inspection Dates:10/20/86

Signature: Herbert Berton

CAC Section:	Observations:	Conclusions:
17713 Odor Control	Slight odors were detected on site but not at the site perimeter.	Comply
17714 Traffic Control	Traffic flow did not cause a public safety hazard and I did not observe vehicles stacking onto public roads.	Comply
17715 Ponded Liquid	This site did not have any ponded liquid.	Comply
Disposal Site Equipment:		
17726 General	The numbers and types of equipment on site were consistant with requirements listed in the RDSI. The RDSI states that one Cat D-7 and a scraper are required.	Comply
17727 Standby Equipment	Standby equipment is available on base and consists of four bulldozers.	Comply
Disposal Site Maintenance:		
17731 General	Equipment and facility maintenance programs meet the requirements of Section 17731.	Comply
17732 Operating Site Maintenance	As there were fewer than three maintenance related sections in violation, this site complies with Section 17732.	Comply
17733 Insp. on Completion	This is not a closed site.	N/A

Facility Name: Hunter-Liggett S.S. **Facility ID No.:**27-AA-13

Name of Inspector: Herbert Berton **Inspection Dates:**10/20/86

Signature: Herbert Berton

CAC Section:	Observations:	Conclusions:
17734 Completed Site Maintenance	This is not a closed site.	N/A
17735 Recording	This site pre-exists the implementation of this standard and has not closed.	N/A
Disposal Site Special Wastes:		
17741 Burning Wastes	I did not observe any burning waste at this site.	Comply
17742 Hazardous Wastes	I found 18 empty canisters of calcuim hydride with a white powdery residue, underneath a tree approximately 300 feet east of the active trench. Title 22, Article 9, Section 66680 lists calcium hydride as extremely hazardous due to its corrossive, flammable and reative nature. Copies of slides have been sent to Dwight Hoenig, Chief, Toxic Substances Central Division, North Coast California Section. Subsequent inspectors should evaluate this landfill carefully fore compliance with Section 17742.	Indeterminate
17743 Liquid Wastes	This site does not accept liquid wastes.	Comply
17744 Dead Animals	I did not observe any dead animals at this site.	Comply

Facility Name: Hunter-Liggett S.S. Facility ID No.:27-AA-13

Name of Inspector: Herbert Berton Inspection Dates:10/20/86

Signature: Herbert Berton

CAC Section:	Observations:	Conclusions:
Disposal Site Reports and Reviews:		
17751 Periodic Site Review	This site is over due for its five-year engineering review. The last review was done in 1977. The five-year review was due in 1982.	Violation

Notes:

The hazardous waste prohibition sign has not been put back up as suggested in the previous inspection dated 5/19/86. The other hazardous waste prohibition sign located on a tree by the internal road, is partially blocked from view due to low branches and should either be relocated or the tree should be pruned back.

There was a telephone on site which rang to the base operator but the wires to the phone were cut rendering it useless. (See photo II-5).

SWIS-09 (REV. 1/85)

NOTICE OF INSPECTION DISPOSAL SITE

LOCAL ENFORCEMENT AGENCY: _____

FACILITY FILE NUMBER (COUNTY LEA NUMBER)	PROGRAM CODE	INSPECTION DATE (MM DD YY)	T-OUT / T-IN	TOTAL TIME (DECIMAL HOURS)
27 - AA - 13	P	(1011) 10/20/88		(1031) II

FACILITY NAME: Hunter Liggett S.L.

FACILITY LOCATION:

INSPECTOR: H. Burton

ALSO PRESENT:

RECEIVED BY:
Operator _____
Owner _____

Comments: 17658 - No gate on road to northend landfill. 17694 - Exposed waste in intermediate cover areas. 17707 - Active squirrel burrows throughout landfill. 17708 - Erosion north of well #4. 17709 - Groundwater in contact with waste. 17742 - Indeterminate if empty containers contain hydraulic with white, powdery residue. 17751 - Engineering review needed

IND - Indeterminate

	*V	C
(3011) RECORDS		☒
☐ ACCURATE WEIGHT/VOLUME RECORDS MAINTAINED 17636		
☐ ADEQUATE SUBSURFACE RECORDS MAINTAINED 17637		
☐ LOG OF SPECIAL OCCURRENCES MAINTAINED 17638		
☐ RECORDS AVAILABLE FOR INSPECTION 17639		
(3021) PERSONNEL		☒
☐ ADEQUATE NUMBER OF QUALIFIED PERSONNEL AVAILABLE 17646		
☐ PERSONNEL ADEQUATELY TRAINED 17647		
☐ ADEQUATE SUPERVISION PROVIDED 17648		
☐ SITE ATTENDANT AVAILABLE FULL-TIME OR AS DETERMINED BY LEA 17649		
(3031) SIGNS		☒
☒ IDENTIFICATION SIGNS AT EACH POINT OF ACCESS 17656		
☐ ENTRY SIGN STATES FEES, HOURS OF OPERATION, WASTES ACCEPTED/NOT ACCEPTED 17657 N/A		
☐ NON-HAZARDOUS UNATTENDED SITES HAVE SIGN WARNING USERS OF UNAVAILABILITY OF COMMUNICATION FACILITIES 17658		
(3041) SECURITY		☐
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(3252) LITTER (P)		
☐ LITTER NOT ALLOWED TO MIGRATE OFF-SITE 17683 N/A		
(3261) NOISE		☒
☐ NOISE CONTROL ADEQUATE 17712		
(3271) ODOR		☒
☐ ODOR CONTROL ADEQUATE 17713		
(3272) ODOR (P)		
☐ AMBIENT AIR AT OR BEYOND FACILITY BOUNDARY IS NOT ODOROUS 17683 MA		

	V	C
(3281) TRAFFIC		☒
☐ TRAFFIC CONTROL ADEQUATE WITHIN SITE. TRAFFIC MINIMIZES INTERFERENCE, SAFETY PROBLEMS, AND STACKING ON PUBLIC ROADS 17714		
(3291) EQUIPMENT		☒
☐ EQUIPMENT ADEQUATE IN TYPE, CAPACITY, AND NUMBER, AND IS ADEQUATELY MAINTAINED 17726		
☐ STANDBY EQUIPMENT AVAILABLE TO COMPLY WITH SEC. 17683 AND OTHER SECTIONS 17727		
(3301) MAINTENANCE		☒
☐ EFFECTIVE MAINTENANCE PROCEDURES AND PROGRAMS DEVELOPED AND UTILIZED 17731		
☐ ADEQUATE MONITORING AND REPAIR OF DETERIORATED CONDITIONS 17732		
(3311) CLOSURE		
☐ AFTER CLOSURE, IF LEACHATE, EXTENSIVE SURFACE CRACKING OR SETTLEMENT OCCURS, THE OWNER SHALL NOTIFY LEA AND SHALL MONITOR AND REPAIR SITE FOR A PERIOD OF 5 YEARS OR LONGER 17734 MA		
☐ UPON SITE CLOSURE, DETAILED DESCRIPTION MUST BE FILED WITH THE LEA AND WITH THE COUNTY RECORDER 17735		
(3321) SPECIAL WASTES		
☐ BURNING WASTES IMMEDIATELY SPREAD AND EXTINGUISHED IN SAFE AREA 17741		
☒ SITE ACCEPTS ONLY APPROVED HAZARDOUS WASTES AND TAKES PRECAUTIONS TO ELIMINATE OR CONTROL HARMFUL DUSTS, FUMES, MISTS, VAPORS, OR GASES 17742 IND		
☐ LIQUID WASTES APPROVED BY RWQCB, LOCAL HEALTH ENTITY AND LEA 17743		
☐ DEAD ANIMALS ALLOWED BY LOCAL REGULATIONS 17744		
(3331) OTHER	☒	
☐ 17751 - Engineering review needed		

*V = Violation
C = Compliance

525

Bin Lor

STATE OF CALIFORNIA

GEORGE DEUKMEJIAN, Governor

CALIFORNIA WASTE MANAGEMENT BOARD
1020 NINTH STREET, SUITE 300
SACRAMENTO, CA 95814

DEC 09 1986

Dwight Hoenig, Chief
Toxic Substances Contol Division
North Coast California Section
2151 Berkeley Way
Berkeley, CA 94704

Subject: Hazardous Waste at Hunter Liggett Sanitary Landfill 27-AA-13

Dear Mr. Hoenig:

During a routine Presley inspection conducted on October 20, 1986 at Hunter Liggett Sanitary Landfill(27-AA-13), 18 empty Calcium Hydride canisters with a white, powdery residue were discovered (please see enclosed slides). Title 22, Article 9, Section 66680 lists calcium hydride as extremely hazardous due to its corrossive, flammable, and reactive nature.

I felt you should be informed of this discovery since Hunter Liggett Sanitary Landfill is a Class II-2 landfill and is not permitted to accept hazardous waste.

Sincerely,

SIGNED AND SENT

Kerry Jones, Chief
Enforcement Division

Enclosure

mea

526

STATE OF CALIFORNIA GEORGE DEUKMEJIAN, Governor

CALIFORNIA WASTE MANAGEMENT BOARD
1020 NINTH STREET, SUITE 300
SACRAMENTO, CA 95814

To: Joe A. Cochran, P.E., Chief
Environmental and Natural Resources
Facilities Engineering
Fort Ord,, CA 93941

Subject: Report of inspection: Hunter Liggett Sanitary Landfill 27-AA-13

Government Code Section 66796.38 requires the California Waste Management Board (Board) to conduct inspections of solid waste facilities for the purpose of evaluating compliance with the State Standards for Solid Waste Handling and Disposal (Title 14. California Administrative Code, Division 7 Chapter 3, commencing with section 17200). Under this program, each facility will be inspected at least three separate times. As you are probably aware, the subject facility received its third inspection on January 15, 1987. Enclosed please find the Evaluation Report resulting from this third inspection. Copies of photographs or slides referred to in the report are available from the Board upon written request.

Results of the three field inspections along with all pertinent supporting data in our files have now undergone staff review. A final staff report is currently being prepared and will be sent to you as soon as possible. The following repeated and/or uncorrected violations of State Minimum Standards were identified during our evaluation:

17682 - Cover

17684 - Intermediate Cover

17707 - Vector and Bird Control

17742 - Hazardous Wastes

17751 - Periodic Site Review

At the March meeting of the California Waste Management Board tentatively scheduled for March 26-27, 1987 staff will present its final evaluation report to the Board. The Board will consider whether they wish to issue a letter notifying you of the Board's intent to place the subject facility on the State List of Non-Complying Facilities unless specified corrective measures are implemented.

You and the Local Enforcement Agency are invited to address the Board with any information you feel the Board should consider at its March meeting. A notice of the meeting will be sent at least 10 days prior to the scheduled date.

A copy of this letter and the enclosed report will be sent to the LEA. If you have any questions regarding this program, please contact me at (916) 322-6172.

Sincerely,

Kerry D. Jones

Kerry D. Jones, Chief
Enforcement Division
Enclosure

Mary Anne Dennis-Bannister, Monterey Co. Health Department

mea

CALIFORNIA WASTE MANAGEMENT BOARD

SOLID WASTE FACILITY
EVALUATION REPORT

Facility Name: Hunter Liggett Sanitary L.F. Facility ID No.: 27-AA-13

Name of Inspector: Martha Vazquez Inspection Dates: 1/15/87

Signature: M. Vázquez

LEGEND

C = Compliance V = Violation
I = Indeterminate N = Not Applicable

CAC	SECTION	OBSERVATIONS	RESULT
		DISPOSAL SITE INFORMATION	
17616	Report of Disposal Site Information.	I reviewed the RDSI, dated 1/04/78, and found it satisfactorily described site operations.	C
		DESIGN RESPONSIBILITY.	
17626	Design Responsibility	This standard applies to new facilities that were permitted after 1975. As this site commenced operations in 1954, prior to the implementation of this standard, this section is not applicable.	C
17627	Ultimate Use.	The RDSI, dated 1/04/78, states that "The land will probably be used for training after closure of the site. No structures will be placed on the landfill site [after closure]."	C
17628	General Design Parameters.	The site design accounted for all factors listed in Section 17628.	C

Section Manager _____

CAC	SECTION	OBSERVATIONS	RESULT
17629	Public Health Design Parameters	The site design met all criteria listed in Section 17629.	C
		DISPOSAL SITE RECORDS.	
17636	Weight/Volume Records.	I reviewed monthly volume records at the Fort Hunter Liggett Engineering Office. The average volume of waste received per month is 1,200 cubic yards.	C
17637	Subsurface Records.	I reviewed copies of subsurface records that were present in the Board facility files. The records properly meet criteria required by Section 17637.	C
17638	Special Occurrences.	This standard applies to sites receiving greater than 100 cubic yards of waste per day. This site receives less than this amount and is exempt from this standard.	N
17639	Inspection of Records.	Site records are kept at the Fort Hunter Liggett Engineering Office. All records were made immediately available to me at the office.	C
		DISPOSAL SITE PERSONNEL.	
17646	Availability.	This site employed one site operator. He also doubles as a refuse collector and is present at the site during parts of the day. No site operation appeared to be restricted by a lack of personnel.	C
17647	Training.	Pete Anderson, Site Supervisor, informed me that site employees are hired with previous experience and they receive on the job training. I did not observe any activity restricted because of a lack of training.	C

Inspector: M. V[illegible]

CAC	SECTION	OBSERVATIONS	RESULT
17648	Supervision.	Pete Anderson is the site supervisor. I did not see any adverse conditions that were due to a lack of supervision.	C
17649	Site Attendant.	This site is not open to the public. It is only accessed by military personnel and a civilian site attendant was present part time.	C
		DISPOSAL SITE IMPROVEMENTS.	
17656	I.D. Signs.	Identification signs indicating the site's location were present at the main gate.	C
17657	Entry Signs.	This section applies to sites that are open to the public. As this site is accessed only by military personnel, this section is not applicable.	N
17658	Site Security.	The RDSI, dated 1/04/78, states this site has no fence for security.	C
17659	Access Roads.	The main access was via a smooth, dirt surfaced, two lane road. The roadway allowed safe access for all vehicles.	C
17660	Internal Roads.	Internal roads were surfaced with packed soil. They were smooth and allowed safe access to all active site areas.	C
		DISPOSAL SITE HEALTH AND SAFETY.	
17666	Sanitary Facilities.	Sanitary facilities were not available on site. They are available to the site operator at the fort barracks. Note: The RDSI states sanitary facilities will be provided at the site.	C

Inspector: M. Vaz

CAC	SECTION	OBSERVATIONS	RESULT
17667	Water Supply.	The equipment operator provides his own drinking water. Note: The RDSI states that potable water will be provided at the site.	C
17668	Communication Facilities.	Should an emergency arise, a public telephone is available within a five minute drive on base.	C
17669	Lighting.	This section is not applicable as site operations are not conducted during hours of darkness.	N
17670	Personnel Health and Safety.	Site employees are issued safety boots, hard hats, gloves, goggles and particle masks. The LEA does not require the use of any specific safety equipment.	C
		DISPOSAL SITE OPERATIONS.	
17676	Confined Unloading.	I observed that all waste was unloaded into the base of the tipping trench. This area was well confined and correct in size for the number of vehicles using this site. See slide III.3 and III.4.	C
17677	Spreading and Compacting.	I observed that all waste was thoroughly spread and compacted throughout the inspection day.	C
17678	Slopes and Cuts.	I measured the slope of the working face with a clinometer and found it to be seven degrees (8.13 : 1.00 horizontal to vertical ratio). This angle allowed good compaction of all waste.	C

Inspector: M. Vaz

CAC	SECTION	OBSERVATIONS	RESULT
17679	Final Site Face.	The final site face was identified by the site operator, Dale Barrett, as the area adjacent to the main gate. The area was nicely vegetated and had a neat, finished appearance. I observed that the slope was not greater than the Standard limitation of thirty degrees (1.75 : 1.00 horizontal to vertical ratio). Note: This area has not received a final cap as required per Regional Water Quality Board standards.	C
17680	Stockpiling.	I observed that a stockpile of cover material was kept on the sides of the tipping trench. The location of the stockpile did not interfere with other site activities.	C
17681	Availability of Cover.	Cover material is provided through the excavation of tipping trenches. It is anticipated that cover material will be available through the duration of the site's life.	C
17682	Cover.	I observed that waste requiring daily cover was dumped in the demolition area. This included a 20 x 50 ft. pile of wood waste, household waste, and fiberglass. See slides III.5 - III.9.	V
17683	Performance Standards.	This section is not applicable. This site does not operate under performance standards.	N
17684	Intermediate Cover.	Intermediate cover areas were identified by site operator, Dale Barrett. I observed daylighting of waste in the intermediate cover area just north of the active trench. This area appeared to have a very thin layer of cover material.	V

Inspector: M. Vargas

CAC	SECTION	OBSERVATIONS	RESULT
17685	Final Cover.	Site operator, Dale Barrett, identified the area adjacent to the main gate as a final cover area. I observed no waste daylighting through final cover areas.	C
17686	Scavenging.	I did not observe scavenging at this facility during my inspection.	C
17687	Salvaging Permitted.	This section is not applicable. This site does not conduct salvaging operations.	N
17688	Volume Reduction and Energy Recovery.	This section is not applicable. Neither volume reduction nor energy recovery operation are conducted at this site.	N
17689	Processing Area.	This section is not applicable. Salvaging operations are not conducted at this site.	N
17690	Storage of Salvage.	This section is not applicable. Salvaging operations are not conducted at this site.	N
17691	Removal.	This section is not applicable. Salvaging operation are not conducted at this site.	N
17692	Non-Salvageable Items.	I did not observe the salvage of any item considered non-salvageable by this section.	C
		DISPOSAL SITE CONTROLS	
17701	Nuisance Control.	I did not observe any potential or existing nuisance problems not already addressed in a more specific section of this evaluation.	C
17702	Animal Feeding.	I did not see evidence of animal feeding at this site. Note: The operators of the site informed me that the army leases adjoining property to private cattle ranchers and cattle do feed on site.	C

Inspector: M. Vo

CAC	SECTION	OBSERVATIONS	RESULT
17703	Fire Control.	I observed that there were roads serving as fire breaks around the active face and demolition area, and there was a bulldozer available on site to push earth. Note: At 1300 hours, I observed a fire to the east of the tipping trench. A large tree stump and the adjacent ground were smouldering and smoking. Nearby ground squirrel burrows were also charred and smoking. It appeared that the fire may have been burning for a substantial amount of time and had moved underground via the burrows. I informed the site operator, Dale Barrett, and the Facility Manager, Pete Anderson, of the fire and they advised the post fire department. See slides III.10-III.13.	C
17704	Leachate Control.	I did not observe surface leachate at this site. Richard Aleshire, Central Coast Regional Water Quality Control Board (RWQCB), advised me of the following by telephone: This site has a Calderon priority ranking of number two. The required water monitoring wells have been drilled. Reports from the monitoring wells are regularly sent to the RWQCB and to date no problems with water quality have been detected. This site is preparing for closure and is currently in compliance with Subchapter 15 requirements. Based on my observations and discussion with the RWQCB, I have found that the operators of this facility have taken adequate measures to monitor leachate and are currently in compliance with this section.	C

Inspector: M. Vaz

CAC	SECTION	OBSERVATIONS	RESULT
17705	Gas Control.	As there were no structures on site and no structures within 1000 feet of the site perimeter, I did not test for methane gas migration.	C
17706	Dust Control.	This site was not dusty the day of this inspection.	C
17707	Vector and Bird Control.	I observed a large number of ground squirrel burrows at this site. Burrows in this great a number indicate there was a vector problem at this site. The burrows should be filled to circumvent vector harborage.	V
17708	Drainage and Erosion Control.	1. I observed seven depressions that held ponded rain water in the section of the site identified as an intermediate cover area by site operator, Dale Barrett. The smallest pond was approximately 15 x 15 feet, and the largest was 50 x 30 feet. This area should be regraded to promote runoff. See slide III.14 - III.18. See map. 2. I observed eroded gullies down the slopes just west of the avtive trench. This area was identified as an intermediate cover area by site operator, Dale Barett. (See slide III.19).	V
17709	Contact with Water.	I observed fiberglass and household waste sitting in ponded water in the demolition area. I measured the pond with a rangefinder and found it to be 40 x 12 feet in size and one foot deep. This area should be regraded to promote runoff and the waste disposed of in the active cover area (see Section 17682-Cover). See slides III.5 and III.21. See map.	V
17710	Grading of Fill Surfaces.	I observed that fill areas were gently graded to promote lateral runoff. (The grade was very slight and I would expect that there will be future problems with settlement and subsequent ponding).	C

Inspector: M. Vogt

CAC	SECTION	OBSERVATIONS	RESULT
17711	Litter Control.	I observed that litter had blown off the southern end of this site resulting in a large accumulation of litter collecting in an adjacent field and on the river bank. See slides III.22 - III.26.	V
17712	Noise Control.	I did not detect noise levels that would constitute a public nuisance or noise hazard at this site.	C
17713	Odor Control.	I detected faint garbage odors on site, but none at the site perimeter.	C
17714	Traffic Control.	Vehicle use was very light at this site. I did not observe any safety problems associated with traffic flow or any vehicles stacking onto public roads.	
17715	Ponded Liquid.	This section is not applicable. I did not observe any engineered holding ponds at this site.	N
		DISPOSAL SITE EQUIPMENT.	
17726	General.	Equipment used at this site was consistent with what is required by the RDSI. One bulldozer was available on site and it was adequate in operating a site of this size.	C
17727	Standby Equipment.	Standby equipment was available from the military base.	C
		DISPOSAL SITE MAINTENANCE.	
17731	General.	Equipment and facility maintenance programs were effective. Facility maintenance is ongoing and equipment receives routine maintenance.	C
17732	Operating Site Maintenance.	I did not observe any defective or deteriorating conditions that would indicate site facilities were not maintained on a regular basis. In addition, there were fewer than three	C

Inspector: M. Hoy

CAC	SECTION	OBSERVATIONS	RESULT
		maintenance related sections in violation during this inspection. This constitutes a compliance finding of Section 17732.	
17733	Inspection on Completion.	This section is not applicable. This site has not closed.	N
17734	Completed Site Maintenance.	This section is not applicable. This site has not closed.	N
17735	Recording.	This section is not applicable as this site has not closed and it commenced operations in 1954, prior to the implementation of this standard.	N
		DISPOSAL SITE SPECIAL WASTES.	
17741	Burning Wastes.	I did not observe burning waste received at this site the day of this inspection.	C
17742	Hazardous Wastes.	I observed the following hazardous waste containers dumped in the active face and the demolition area. The containers held only residual amounts of substance. 1. Six 5 gallon drums of Lube Oil. 2. Four 5 gallon drums of Lacquer Thinner. 3. Three 5 gallon drums of Paint Thinner. 4. One 1 gallon container of Enamel Paint. 5. One 55 gallon drum of Lube Oil. I assisted Peter Anderson, Fort Hunter Liggett Facility Manager, in removing all, but the 55 gallon drum, from the waste stream. The containers were placed in a vehicle and removed from the site for proper disposal. See slides III.26 - III.37. The local health officer and the Monterey County Board of Supervisors were advised of the incident as required by Proposition 65 of 1986.	V

Inspector: M. Wa

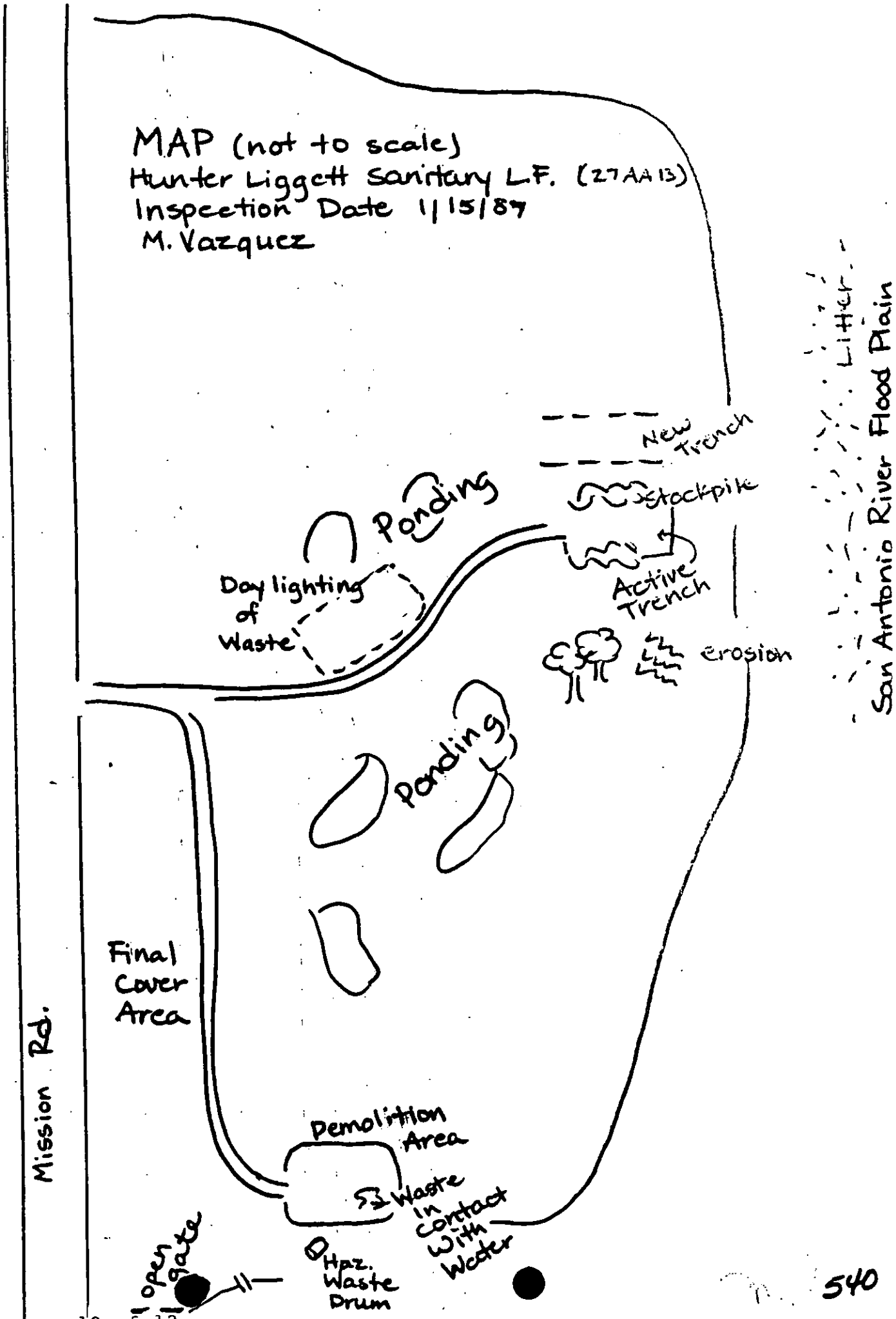
CAC	SECTION	OBSERVATIONS	RESULT
17743	Liquid Wastes.	The RDSI prohibits disposal of liquid waste at this site. I did not see liquid waste received at this facility.	C
17744	Dead Animals.	I did not observe dead animals received at this site the day of this inspection.	C
		DISPOSAL SITE REPORTS AND REVIEWS.	
17751	Periodic Site Review.	This site was permitted on 1/04/78. A five year engineering review was due on 1/04/83. The operators of this site are overdue in submitting the review.	V

NOTES

During parts of this inspection I was accompanied by Dale Barrett, site operator; and Peter Anderson, Fort Hunter Liggett Facility Manager. I conducted inspection interviews with Mary Dennis-Bannister Senior Sanitarian, Solid Waste Management Specialist, County of Monterey Department of Health; and Richard Alshire, Central Coast Regional Water Quality Control Board.

The weather was cold and windy the day of this inspection.

Inspector: M. Va


MAP (not to scale)
Hunter Liggett Sanitary L.F. (27AA13)
Inspection Date 1/15/87
M. Vazquez
New Trench
Stockpile
Ponding
Day lighting of Waste
Active Trench
erosion
Litter
San Antonio River Flood Plain
Ponding
Final Cover Area
Mission Rd.
Demolition Area
Waste in contact with Water
open gate
Hpz. Waste Drum

CALIFORNIA WASTE MANAGEMENT BOARD

Agenda #11-H

March 26 - 27, 1987

Item:

Consideration of notifying the operator of the Fort Ord Sanitary Landfill (Monterey County) of the Board's intent to include that facility on the State List of Non-complying Facilities as required by Government Code Section 66796.38.

Key Issues:

- Fort Ord Sanitary Landfill has been evaluated for compliance with State Minimum Standards including three on-site inspections by Board staff.
- Ongoing and/or repeated violations of the following Minimum Standards were documented:

  17616 - Report of Disposal Site Information
  17637 - Subsurface Records
  17658 - Site Security
  17708 - Drainage and Erosion Control
  17751 - Periodic Site Review

- Staff recommends that the site operator be directed to establish a compliance schedule within 30 days. The Chief Executive Officer would be authorized to issue a 90 day notice of the Board's intent to place the site on the State List of Non-Complying Facilities if the adopted compliance schedule is not met.

Site Information:

Name:	Fort Ord Sanitary Landfill
SWIS #:	27-AA-015
Facility Type:	Class III (new classification)
Operational Status:	Open
Location:	Fort Ord Military Reservation, Monterey County
Setting:	Multi-unit residences within 1000 feet on the north, east and west; undeveloped land on the south.

Permitted Tonnage:	60 TPD
In-Place Tonnage:	Approximately 224,640 tons
Permitted Acreage:	13.7 acres
Facility Owner:	U.S. Army
Facility Operator:	U.S. Army
Local Enforcement Agency:	Monterey County Department of Public Health
Calderon Ranking:	#1

Summary of Repeated Presley Violations

CAC Section	1st Inspec. May 27, 1986	2nd Inspec. Oct. 24, 1986	3rd Inspection January 12 & 14, 1987
17616 - Report of Disposal Site Information	Violation	Comply	Violation
17637 - Subsurface Records	Violation	Violation	Violation
17658 - Site Security	Comply	Violation	Violation
17708 - Drainage and Erosion	Violation	Comply	Violation
17751 - Periodic Site Review	Violation	Violation	Violation

Background:

Fort Ord Sanitary Landfill is an existing 13.7 acre, Class III (new classification) landfill which is permitted to accept 60 tons of waste per day. Disposal operations began in 1974. A Solid Waste Facility Permit was issued on January 4, 1978. According to the most recent permit, January 4, 1978, the disposal site was to terminate operations in approximately 1981.

Types of wastes received at this site include:

a) residential
b) commercial
c) industrial
d) small dead animals

The following actions are prohibited at this site:

a) Disposal of hazardous waste
b) Burning
c) Disposal of large dead animals
e) any liquid waste

The facility is owned and operated by the U.S. Army

Land surrounding the site includes:

Multi-unit residences within 1,000 feet on the north, west and east perimeters. Land within 1,000 feet of the southern perimeter is undeveloped.

Related Issues:

The site has a Calderon Priority Ranking of #1. The operator has been working with the Central Coast Regional Water Quality Control Board (RWQCB) to gain compliance with Calderon legislation and Subchapter 15 requirements. Groundwater monitoring has shown that a plume of contaminents, originating from the landfill, migrates towards the City of Marina's wells. Monitoring well samples have shown the amounts of carbon tetrachloride and tricloroethylene to be below the State action levels. The RWQCB has issued Cleanup and Abatement order 86-87 to address the contamination problem. By this order, site operators are required to conduct a background study on existing wells, drill more monitoring wells, and have gas soil tests done. The operators are meeting RWQCB time schedules as funds become available. According to Dick Brown, RWQCB Geologist, the operators are making progress on the contamination problem and are working toward reaching compliance.

EMCON Associates has been retained by the site operators as consultants. EMCON has filed a landfill confirmation study to identify areas outside of the permitted landfill that contain deposited waste, define groundwater flow, and find the possible source of contamination. The toxics divisions of Department of Health Services, RWQCB and Monterey County Department of Health are working with EMCON and the operator on the contamination issue.

The LEA has been notified by the operator of their intent to cease site operations sometime in 1987. Formal closure plans are dependent on recommendations and approval from concerned agencies.

Past Compliance:

For the period between May 22, 1985 and May 21, 1986, a year before the Presley evaluation started, no inspections were conducted by the Local Enforcement Agency (LEA).

Recent Compliance:

During the California Waste Management Board evaluation period for Fort Ord Sanitary Landfill (May 22, 1986 to January 14, 1987) there were two Local Enforcement Agency inspections available for staff review. The most recent was on November 21, 1986. Four violations were noted during the evaluation period, they were:

17636 - Weight/Volume Records
17637 - Subsurface Records
17658 - Site Security
17751 - Periodic Site Review

A chronology of events occurring during the CWMB evaluation is presented below:

May 22, 1986

The first of three inspections by the CWMB was conducted by Pamela Badger. Sections in violation were as follows:

17616 - Report of Disposal Site Information
17637 - Subsurface Records
17666 - Sanitary Facilities
17667 - Water Supply
17708 - Drainage and Erosion Control
17751 - Periodic Site Review

Sections with an Indeterminate status were as follows:

17705 - Gas Control
17726 - General
17742 - Hazardous Wastes

All other CAC sections were found to be either in compliance or not applicable.

July 2, 1986

Results of the first inspection were transmitted to the operator and the LEA (Attachment #1). The cover letter described the nature of our evaluation program and the consequences of noncompliance.

September 22, 1986

A letter from the site owner to Board staff was received. The letter indicated that all violations had been, or were in the process of being, corrected (Attachment #2).

October 2, 1986

Board staff sent a letter of reply to the operator. The letter acknowledged receipt of the September 22 letter and expressed support for compliance efforts (Attachment #3).

October 24, 1986

The second of the three inspections was conducted by Herbert Berton.

Sections in violation were as follows:

17637 - Subsurface Records
17658 - Site Security
17751 - Periodic Site Review

Section 17682 - Cover was left in an indeterminate status.

All other CAC sections were found to be either in compliance or not applicable.

November 21, 1986

The results of the second CWMB inspection were transmitted to the operator and the LEA (Attachment #4). The cover letter again explained the nature of the evaluation program and the consequences of non-compliance.

January 12 and 14, 1987

The third Presley inspection was conducted by Martha Vazquez. Sections in violation were as follows:

17616 - Report of Disposal Site Information
17637 - Subsurface Records
17658 - Site Security
17682 - Cover
17708 - Drainage and Erosion Control
17727 - Standby Equipment
17751 - Periodic Site Review

Section 17705 - Gas Control was left in an indeterminate status.

All other CAC sections were found to be either in compliance or applicable.

March 5, 1987

Results of the third inspection were transmitted to the operator and LEA (Attachment #5). The cover letter reiterated the nature of our evaluation program. It also informed the operator and LEA of staff's intent to have the Board consider placing Fort Ord Sanitary landfill on the State's List of Non-Complying Facilities at its March meeting unless corrective measures were taken.

Summary:

The Fort Ord Sanitary Landfill has been evaluated by the California Waste Management Board staff for compliance with State Minimum Standards. All pertinent information including data from three separate California Waste Management Board staff inspections has been reviewed. Continued violations of the following sections have been documented:

17616 - Report of Disposal Site Information
17637 - Subsurface Records
17658 - Site Security
17708 - Drainage and Erosion Control
17751 - Periodic Site Review

Board Options:

Option #1

Direct the operator to establish a schedule for bringing the site into compliance with State Minimum Standards.

Under this option, the operator must submit a compliance schedule to the Board within 30 days stating specific dates for initiating and completing the required actions outlined below. If an agreeable schedule is not received by the Board within 30 days, and/or if dates specified for implementing and completing the required actions are not met, this option authorizes the Chief Executive Officer to issue a 90-day notice of the Board's intent to place the site on the State List of Non-Complying Facilities.

Specified Actions:

1. 17616 Report of Disposal Site Information
   17637 Subsurface Records
   17751 Periodic Site Review

Establish specific dates for meeting Report of Disposal Site Information, Subsurface Record and Periodic Site Review requirements. In addition, if it's still the operator's intent to cease site operations in 1987, plans for closure shall be initiated as required by the LEA.

2. 17658 - Site Security

Install fencing around the site's perimeter to discourage unauthorized access to the site. Primary attention should be given to securing the main gate entrance, and the western perimeter that is adjacent to a community park.

3. 17708 - Drainage and Erosion Control

a. Establish and begin implementation of a work plan to install a drainage system at the south eastern end of the site.

b. Submit a work plan specifying dates for initiating and correcting subsidence that has occurred in intermediate cover areas.

Option #2

Notify the operator of the Board's intent to place Fort Ord Sanitary Landfill on the State List of Non-Complying Facilities unless the following action is taken within 90 days of the notice:

The operator must develop a compliance schedule that is mutually agreed upon by the Board and the Local Enforcement Agency for completion of the required actions outlined in Option #1. Failure to meet any deadline contained in the compliance schedule will result in a recommendation by staff that the Board place the site on the State List of Non-Complying Facilities. In no case will such a recommendation be made in less than 90 days. Verification of all deadlines will be made through additional staff inspections as necessary.

Option #3

No Action.

Notification:

The site operator and LEA have been invited to present to the Board at its March meeting any information relevant to the matter under consideration.

Recommendation:

Based on the information available to the staff at the time of the report, staff recommends that the Board implement Option #1.

Fort Ord Sanitary Landfill

Attachments:

#1. 1st CWMB Inspection Report, May 27, 1987.

#2. Operator response to 1st CWMB inspection, September 22, 1986.

#3. Board staff reply letter to site operators September 22, 1986 letter, October 2, 1986.

#4. 2nd CWMB Inspection Report, October 24, 1986.

#5. 3rd CWMB Inspection Report, January 12 & 14, 1987

Working File

STATE OF CALIFORNIA

GEORGE DEUKMEJIAN, Governor

CALIFORNIA WASTE MANAGEMENT BOARD
1020 NINTH STREET, SUITE 300
SACRAMENTO, CA 95814

1st

JUL 02 1986

To: Mr. Joseph Cochran
Chief
Environmental and Natural Resources Office
Facilities Engineering
Fort Ord, CA 93941

Subject: Report of inspection: Fort Ord Sanitary Landill
27-AA-15

Government Code Section 66796.38 requires the California Waste Management Board (Board) to conduct inspections of solid waste facilities for the purpose of evaluating compliance with the State Standards for Solid Waste Handling and Disposal (Title 14. California Administrative Code, Division 7 Chapter 3, commencing with section 17200). Under this program, each facility will be inspected at least three separate times. As you are aware by now, staff has already conducted one of these inspections at the subject facility. The date of that inspection was May 22, 1986. A report resulting from the recent inspection is enclosed. If photographs are referred to in the inspection report, copies will be obtainable upon written request.

The goal of our inspection program is to verify compliance with each of the State Minimum Standards, not merely to find violation(s) of these standards. In order to achieve this we will, as I stated above, be inspecting each facility at least three times. This will provide the following advantages over the previous inspection techniques:

* The program will provide greater fairness to operators of facilities by reducing the possibility that one operator will be inspected under adverse conditions and another under favorable conditions.

* The program will allow for evaluation of conditions, which show seasonal variations such as effectiveness of leachate control systems, vectors, dust, etc.

* The program will provide a track record of compliance which will be used in evaluating standards for which a single violation may not be sufficient reason to place the facility on the State List of Non-Complying Facilities when the facility is generally in compliance with that standard, i.e., the daily cover standard.

550

Although we do not intend to provide advance notice of the inspection dates to operators, the Local Enforcement Agency (LEA) will be notified of those dates, and will be invited to accompany our staff on the inspection.

If, after three inspections, your facility continues to be operating in violation of one or more of the State Minimum Standards you will be notified of this finding by certified letter. A copy of that letter will be sent to the LEA. After 90 days or upon notification of correction of all violations(s), Board staff will reinspect the facility. If the facility is still in violation, staff will notify you and the LEA, by certified letter of staff's intent to recommend that the Board place the facility's name on the State List of Non-Complying Facilities at a regularly scheduled meeting of the Board. Should the Board place the facility on that list, State law (Government Code 66796.39) requires that the LEA develop a compliance schedule for correction of the violation(s). If compliance is not achieved within one year, Government Code section 66796.39 directs LEAs to revoke facility operating permits. If the facility is closed or abandoned, staff will recommend that the LEA issue a notice of violation and an order to correct the violations. That Notice and Order will also notify you or the owner of the facility that State law provides that "the unremedied condition of the facility is prima facie evidence of negligence, and in any action for damages against the owner of the property for injury caused by the unremedied condition, the burden of proving the injury was not caused by an unremedied condition shall be on the owner of the property".

If you have any questions regarding the program, please contact me at (916) 322-1769.

Sincerely,

John K. Bell, Manager
Monitoring Section

cc: Walter Wong, Director, Monterey County Environmental Health

fmo

JUL 02 1986

CALIFORNIA WASTE MANAGEMENT BOARD

DISPOSAL SITE
EVALUATION REPORT

Facility Name: Fort Ord Sanitary Landfill **Facility ID No.:** 27-AA-15

Name of Inspector: P. Badger **Inspection Dates:** May 22, 1986

Signature: P. Badger

CAC Section:	Observations:	Conclusions:
Disposal Site Information:		
17616 Report of Disposal Site Information	The Report of Disposal Site Information (RDSI) is incorrect in its descriptions of site capacity, and site life, disposal of sewage sludge, structures within 1000 feet of the site, and leachate and groundwater monitoring systems.	Violation
Design Responsibility:		
17626 Design Responsibility	This is a preexisting site.	N/A
17627 Ultimate Use	The RDSI states that this property will revert back to training use after closure.	Comply
17628 General Design Parameters	The site design accounts for all factors described in Section 17628.	Comply
17629 Public Health Design Parameters	The site design accounts for all factors described in Section 17629.	Comply
17636 Weight/Volume Records	Waste volume records are kept at the Environmental Office. For the period of October 1985 through March 1986, the landfill took in an average of 170 cubic yards per operating day.	Comply
17637 Subsurface Records	This site has no subsurface records.	Violation

Facility Name: Fort Ord Sanitary Landfill **Facility ID No.:** 27-AA-15

Name of Inspector: P. Badger **Inspection Dates:** May 22, 1986

Signature: P. Badger

CAC Section:	Observations:	Conclusions:
17638 Special Occurrences	This site keeps no log of special occurrences.	Comply
17639 Inspection of Records	Records were available for inspection during normal working hours.	Comply
Disposal Site Personnel:		
17646 Availability	I did not observe any conditions that caused me to suspect inadequate numbers of qualified personnel.	Comply
17647 Training	The training procedure, as described by Mr. Jack Massera of the Environmental Office, is more than adequate.	Comply
17648 Supervision	The site is supervised by the Roads Foreman and by a staff member of the Environmental Office.	Comply
17649 Site Attendant	The site is attended on a part-time basis by an equipment operator and by a gate keeper.	Comply
Disposal Site Improvements:		
17656 Identification Signs	The site is used by the military and their representatives only and does not require I.D. signs.	Comply
17657 Entry Signs	The site has adequate entry signs.	Comply
17658 Site Security	Topographical constraints prevent access from off site. I did not see any evidence of unauthorized entry.	Comply

Facility Name: Fort Ord Sanitary Landfill **Facility ID No.:** 27-AA-15

Name of Inspector: P. Badger **Inspection Dates:** May 22, 1986

Signature: P. Badger

CAC Section:	Observations:	Conclusions:
17659 Access Roads	Access roads were paved and in good condition.	Comply
17660 Internal Roads	Internal roads were either dirt or paved and in good condition.	Comply
Disposal Site Health and Safety:		
17666 Sanitary Facilities	This site has a port-a-potty but has no hand washing facilities.	Violation
17667 Water Supply	No potable water is supplied to site personnel.	Violation
17668 Communications Facilities	The foreman has radio communications.	Comply
17669 Lighting	This site is not used during hours of darkness.	Comply
17670 Personnel Health And Safety	Equipment operators are supplied with head, hearing, dust and eye protection.	Comply
Disposal Site Operations:		
17676 Confined Unloading	Waste was confined to one end of the waste pit.	Comply
17677 Spreading and Compacting	Waste appeared to be spread and compacted properly.	Comply
17678 Slopes and Cuts	The slope of the working face allowed effective compaction.	Comply

Facility Name: Fort Ord Sanitary Landfill **Facility ID No.:** 27-AA-15

Name of Inspector: P. Badger **Inspection Dates:** May 22, 1986

Signature: P. Badger

CAC Section:	Observations:	Conclusions:
17679 Final Site Face	The final site face had a neat appearance and was not steeper than 1 3/4: 1.	Comply
17680 Stockpiling	Stockpiled cover materials did not interfere with other operations.	Comply
17681 Availability of Cover	Cover is available on site.	Comply
17682 Cover	This site applied cover on the required 24 hour basis. (See slide #1.2).	Comply
17683 Performance Standards	This is not a performance standards site.	N/A
17684 Intermediate Cover	Areas of intermediate cover had no exposed waste and were reported to have at least 2 feet of cover.	Comply
17685 Final Cover	The final cover has not yet been applied to this site.	Comply
17686 Scavenging	I saw no scavenging on this site.	Comply
17687 Salvaging Permitted	There were no salvaging operations.	N/A
17688 Volume Reduction and Energy Recovery	There were no salvaging operations.	N/A
17689 Processing Area	There were no salvaging operations.	N/A

Facility Name:
Name of Inspector:
Signature:

Facility ID No.:
Inspection Dates:

CAC Section:	Observations:	Conclusions:
17690 Storage of Salvage	There were no salvaging operations	N/A
17691 Removal	There were no salvaging operations	N/A
17692 Non-Salvageable Items	I saw no nonsalvageable items being recovered from the waste	[illegible]
Disposal Site Controls:		
17701 Nuisance Control	I did not observe any conditions I would expect to create a nuisance.	Comp
17702 Animal Feeding	I did not see any animals fed [illegible]	[illegible]

Facility Name:
Name of Inspector:
Signature:

Facility ID No.:
Inspection Dates:

CAC Section:	Observations:	Conclusions:
17703 Fire Control	Fire control is through firebreaks, water truck, and dozers.	Comply
17704 Leachate Control	I did not see any surface leachate. This site is experiencing a groundwater [illegible] problem including contamination of drinking water wells with volatile organic carbon compounds, some at levels above state action levels. The Central Coast RWQCB is currently working with the site to characterized the problem and plan for possible cleanup. The site is cooperating in this effort.	Comply
17705 Gas Control	I tested for gas at 2 places at the southern perimeter of the landfill and at 2 places along the street across from a baseball diamond on old fill. This area is across Imjin Road from the landfill. I did not find any measurable gas readings but the sand soil collapsed as soon as the bar punch (note) was removed, making deeper than 1 foot impossible. This site will be referred to the CWMB's Standards and Technologies Program for evaluation and possible further testing.	Not [illegible]
17706 Dust Control	The site was not dusty during this inspection.	Comply
17707 Vector and Bird Control	I did not observe any vectors or excess birds.	Comply

Facility Name: Fort Ord Sanitary Landfill **Facility ID No.:** 27-AA-15

Name of Inspector: P. Badger **Inspection Dates:** May 22, 1986

Signature: P. Badger

CAC Section:	Observations:	Conclusions:
17705 Gas Control	I tested for gas 2 places at the southern perimeter of the landfill and at 2 places along the street across from a baseball diamond on old fill. I did not find any measurable gas readings, but the sandy soil collapsed as soon as the bar hole punch was removed, making reading deeper than 1 foot impossible. This site will be referred to the CWMB's Standards and Technologies Program for evaluation and possible further testing.	Indeterminate
17706 Dust Control	The site was not dusty during this inspection.	Comply
17707 Vector and Bird Control	I did not observe any vectors or excess birds.	Comply
17708 Drainage and Erosion Control	The southern section of the fill had no drainage ditches around it. There was no evidence of runoff collecting on top of fill. Jack Massera of the Environmental Office said that the soil is so permeable that surface water just sinks in, making drainage ditches unnecessary. Drainage ditches are nevertheless required. (see slide #1.5).	Violation
17709 Contact with Water	I saw no contact with water.	Comply
17710 Grading of Fill Surfaces	The fill surface appeared to be graded properly.	Comply
17711 Litter Control	There was no litter on this site.	Comply

Facility Name: Fort Ord Sanitary Landfill **Facility ID No.:** 27-AA-15

Name of Inspector: P. Badger **Inspection Dates:** May 22, 1986

Signature: P. Badger

CAC Section:	Observations:	Conclusions:
17712 Noise Control	This site was not a source of excessive noise during this inspection.	Comply
17713 Odor Control	No conditions were observed which would be expected to create an odor nuisance.	Comply
17714 Traffic Control	This site does not receive heavy traffic. There was no traffic stacking during this inspection.	Comply
17715 Ponded Liquid	This site has no ponded liquid.	Comply
Disposal Site Equipment:		
17726 General	The equipment maintenance program, as outlined by Jack Massera, appears acceptable. I did not see anything on this site that led me to suspect there is inadequate equipment to operate the landfill.	Comply
17727 Standby Equipment	Standby equipment is available on a limited basis from the Building and Grounds Division.	Comply
Disposal Site Maintenance:		
17731 General	Due to time constraints, I was unable to address this standard.	Indeterminate
17732 Operating Site Maintenance	Due to time constraints I was unable to go over the site s maintenance monitoring and correction program. I did not see any conditions that I would consider to be deteriorated or defective and thus improperly maintained.	Comply

Facility Name: Fort Ord Sanitary Landfill **Facility ID No.:** 27-AA-15

Name of Inspector: P. Badger **Inspection Dates:** May 22, 1986

Signature: P. Badger

CAC Section:	Observations:	Conclusions:
17733 Insp. on Completion	This is an active site.	N/A
17734 Completed Site Maintenance	This is an active site.	N/A
17735 Recording	This is a grandfathered site.	N/A
Disposal Site Special Wastes:		
17741 Burning Wastes	I did not observe any burning wastes during this inspection.	Comply
17742 Hazardous Wastes	I did not observe any hazardous wastes on the site. Please see the Notes: Section at the end of this report.	Indeterminate
17743 Liquid Wastes	I did not observe any liquid waste disposal during this inspection.	Comply
17744 Dead Animals	I did not observe any dead animal disposal.	Comply
Disposal Site Reports and Reviews:		
17751 Periodic Site Review	This site was last reviewed in 1977-78. It is overdue for its five-year engineering review.	Violation

Facility Name: Fort Ord Sanitary Landfill **Facility ID No.:** 27-AA-15

Name of Inspector: P. Badger **Inspection Dates:** May 22, 1986

Signature: P. Badger

Notes:

I was accompanied by Mary Anne Dennis-Bannister of the Monterey County Health Department and Jack Massera of the Fort Ord Environmental Office during this inspection. The weather was fair and mild.

I saw a stack of full paint and resin cans behind a dumpster off of Imjin Road. These materials were not on the permitted site but were not being properly handled as hazardous materials. Subsequent inspectors should evaluate this site carefully for the hazardous wastes standard and report any infractions to the Department of Health Services immediately (see slides # 1.9 - 1.11).

JUL 02 1986

SWIS-09 (REV. 1/85)

NOTICE OF INSPECTION DISPOSAL SITE

LOCAL ENFORCEMENT AGENCY: _____

FACILITY FILE NUMBER (COUNTY LEA NUMBER)	PROGRAM CODE	INSPECTION DATE (MM DD YY)	T-OUT / T-IN	TOTAL TIME (DECIMAL HOURS)
[illegible] - AA - 15	[illegible]	(1011) 5 22 86		(1031) 5

FACILITY NAME

FACILITY LOCATION

INSPECTOR

ALSO PRESENT

RECEIVED BY:

Operator _____

Owner _____

Comments: _____

	*V	C
(3011) RECORDS		
☐ ACCURATE WEIGHT/VOLUME RECORDS MAINTAINED 17636		
☐ ADEQUATE SUBSURFACE RECORDS MAINTAINED 17637		
☐ LOG OF SPECIAL OCCURRENCES MAINTAINED 17638		
☐ RECORDS AVAILABLE FOR INSPECTION 17639		
(3021) PERSONNEL		
☐ ADEQUATE NUMBER OF QUALIFIED PERSONNEL AVAILABLE 17646		
☐ PERSONNEL ADEQUATELY TRAINED 17647		
☐ ADEQUATE SUPERVISION PROVIDED 17648		
☐ SITE ATTENDANT AVAILABLE FULL-TIME OR AS DETERMINED BY LEA 17649		
(3031) SIGNS		
☐ IDENTIFICATION SIGNS AT EACH POINT OF ACCESS 17656		
☐ ENTRY SIGN STATES FEES, HOURS OF OPERATION, WASTES ACCEPTED/NOT ACCEPTED 17657		
☐ NON-HAZARDOUS UNATTENDED SITES HAVE SIGN WARNING USERS OF UNAVAILABILITY OF COMMUNICATION FACILITIES 17658		
(3041) SECURITY		
☐ ADEQUATE PERIMETER SECURITY, HAZARDOUS AREAS FENCED AND IDENTIFIED 17658		
(3051) ROADS		
☐ ACCESS ROADS HAVE SMOOTH SURFACE, MINIMIZE DUST AND TRACKING OF MUD, AND ALLOW ALL-WEATHER ACCESS 17659		
☐ INTERNAL ROADS IN SAFE CONDITION, PROVIDE ACCESS DURING INCLEMENT WEATHER, AND ARE PROVIDED WITH DIRECTIONS 17660		
(3071) SANITATION		
☐ ADEQUATE SANITARY FACILITIES AVAILABLE 17666		
☐ SAFE ADEQUATE DRINKING WATER AVAILABLE 17667		
(3081) COMMUNICATIONS		
☐ COMMUNICATION FACILITIES AVAILABLE WHERE HAZARDOUS WASTES ARE ACCEPTED 17668		
(3091) LIGHTING		
☐ LIGHTING ADEQUATE 17669		
(3101) SAFETY		
☐ SAFETY EQUIPMENT IN USE AND BEING WORN 17670		

	V	C
(3111) CONFINED UNLOADING		
☐ UNLOADING ADEQUATELY CONFINED 17676		
(3141) SPREADING/COMPACTING		
☐ SPREADING AND COMPACTION IN TWO-FOOT LAYERS 17677		
(3151) SLOPES/CUTS/GRADING		
☐ WORKING FACE SLOPES ALLOW EFFECTIVE COMPACTION, DEPTH OF CUTS AND SLOPES OF TRENCH SIDES AS APPROVED BY LEA 17678		
☐ FINAL SLOPES HAVE NEAT APPEARANCE AND ARE 1-3/4 : 1 OR FLATTER 17679		
☐ GRADING OF FILL SURFACES ADEQUATE 17710		
(3161) COVER		
☐ STOCKPILING OF COVER DOES NOT INTERFERE WITH OPERATIONS 17680		
☐ SUITABLE QUALITY AND SUPPLY OF COVER MATERIAL AVAILABLE 17681		
☐ COVER PROVIDED AT REQUIRED DEPTH AND FREQUENCY 17682		
☐ INTERMEDIATE COVER PROVIDED AT REQUIRED DEPTH AND FREQUENCY 17684		
☐ FINAL COVER PROVIDED AS REQUIRED 17685		
(3171) SALVAGING/PROCESSING		
☐ SCAVENGING PROHIBITED 17686		
☐ SALVAGING DOES NOT INTERFERE WITH OPERATIONS 17687		
☐ VOLUME REDUCTION AND ENERGY RECOVERY DO NOT INTERFERE WITH OPERATIONS OR CREATE HEALTH, SAFETY OR ENVIRONMENTAL PROBLEMS 17688		
☐ SALVAGING AND VOLUME REDUCTION CONFINED TO CLEARLY IDENTIFIED AREAS 17689		
☐ SALVAGE STORAGE LOCATION OK, VOLUME AS APPROVED BY LEA, MINIMIZES FIRE, NUISANCE 17690		
☐ SALVAGE STORAGE TIME DOES NOT RESULT IN HEALTH OR FIRE PROBLEMS 17691		
☐ SALVAGED MATERIALS APPROVED BY LEA AND LOCAL HEALTH 17692		
(3181) NUISANCE		
☐ OPERATIONS DO NOT CREATE A PUBLIC NUISANCE 17701		
☐ FEEDING OF REFUSE TO ANIMALS FOR HUMAN CONSUMPTION PROHIBITED [illegible]		

	V	C
(3191) FIRE		
☐ FIRE CONTROL ADEQUATE 17703		
(3192) FIRE (P)		
☐ BURNING MATERIALS SPREAD AND EXTINGUISHED. LEA, SWMB NOTIFIED IMMEDIATELY OF FIRE NOT EXTINGUISHED IN 24 HOURS 17683		
(3201) LEACHATE		
☐ ADEQUATE STEPS TAKEN TO MONITOR, COLLECT, TREAT, AND DISPOSE OF LEACHATES 17704		
☐ NO WASTES IN DIRECT CONTACT WITH WATER EXCEPT AS APPROVED BY RWQCB 17709		
(3202) LEACHATE (P)		
☐ REFUSE COVERED WITH NEXT DAY'S REFUSE OR WITH SIX INCHES OF COMPACTED SOIL. TOTAL AREA OF EXPOSED REFUSE IS AS SPECIFIED FOR WET AND DRY SEASONS 17683		
(3211) GAS		
☐ GAS MONITORING AND CONTROL AS REQUIRED 17705		
(3221) DUST		
☐ DUST CONTROL ADEQUATE 17706		
(3231) VECTORS/BIRDS		
☐ VECTOR AND BIRD CONTROL ADEQUATE 17707		
☐ LIQUID PONDS MINIMIZE VECTOR PROPAGATION 17715		
(3232) VECTORS (P)		
☐ THRESHOLD VALUES FOR VECTOR POPULATIONS NOT EXCEEDED 17683		
(3241) DRAINAGE/EROSION		
☐ DRAINAGE AND EROSION CONTROL ADEQUATE 17708		
(3251) LITTER		
☐ LITTER CONTROL ADEQUATE 17711		
(3252) LITTER (P)		
☐ LITTER NOT ALLOWED TO MIGRATE OFF-SITE 17683		
(3261) NOISE		
☐ NOISE CONTROL ADEQUATE 17712		
(3271) ODOR		
☐ ODOR CONTROL ADEQUATE 17713		
(3272) ODOR (P)		
☐ AMBIENT AIR AT OR BEYOND FACILITY BOUNDARY IS NOT ODOROUS 17683		

	V	C
(3281) TRAFFIC		
☐ TRAFFIC CONTROL ADEQUATE WITHIN SITE. TRAFFIC MINIMIZES INTERFERENCE, SAFETY PROBLEMS, AND STACKING ON PUBLIC ROADS 17714		
(3291) EQUIPMENT		
☐ EQUIPMENT ADEQUATE IN TYPE, CAPACITY, AND NUMBER, AND IS ADEQUATELY MAINTAINED 17726		
☐ STANDBY EQUIPMENT AVAILABLE TO COMPLY WITH SEC. 17682 AND OTHER SECTIONS 17727		
(3301) MAINTENANCE		
☐ EFFECTIVE MAINTENANCE PROCEDURES AND PROGRAMS DEVELOPED AND UTILIZED 17731		
☐ ADEQUATE MONITORING AND REPAIR OF DETERIORATED CONDITIONS 17732		
(3311) CLOSURE		
☐ AFTER CLOSURE, IF LEACHATE, EXTENSIVE SURFACE CRACKING OR SETTLEMENT OCCURS, THE OWNER SHALL NOTIFY LEA AND SHALL MONITOR AND REPAIR SITE FOR A PERIOD OF 3 YEARS OR LONGER 17734		
☐ UPON SITE CLOSURE, DETAILED DESCRIPTION MUST BE FILED WITH THE LEA AND WITH THE COUNTY RECORDER 17735		
(3321) SPECIAL WASTES		
☐ BURNING WASTES IMMEDIATELY SPREAD AND EXTINGUISHED IN SAFE AREA 17741		
☐ SITE ACCEPTS ONLY APPROVED HAZARDOUS WASTES AND TAKES PRECAUTIONS TO ELIMINATE OR CONTROL HARMFUL DUSTS, FUMES, MISTS, VAPORS, OR GASES 17742		
☐ LIQUID WASTES APPROVED BY RWQCB, LOCAL HEALTH ENTITY AND LEA 17743		
☐ DEAD ANIMALS ALLOWED BY LOCAL REGULATIONS 17744		
(3331) OTHER		
☐ _____		

*V = Violation
C = Compliance

562

DISTRIBUTION: WHITE OWNER YELLOW OPERATOR PINK LEA

SEP 22 1986

DEPARTMENT OF THE ARMY

HEADQUARTERS 7th INFANTRY DIVISION (LIGHT) AND FORT ORD
FORT ORD, CALIFORNIA 93941-5000

REPLY TO
ATTENTION OF:

Environmental/Natural
Resources Office

John K. Bell
Manager
Monitoring Section
California Waste Management Board
1020 Ninth Street
Suite 300
Sacramento, California 95814

Dear Mr. Bell:

In reference to your Disposal Site Evaluation Report of Fort Ord with inspection date of May 22, 1986, the following information is provided:

a. CAC Section 17616 - Report of Disposal Site Information (RDSI) incorrect. Fort Ord agrees that the RDSI is not complete, or up to date. Harding Lawson Associates has been retained to provide monitoring information on the Fort Ord Class II Fill. When the information has been compiled, a copy will be forwarded to your office.

b. CAC Section 17637 - The site has no subsurface records. When the Harding Lawson Study is completed, the information required will be forwarded to your office.

c. CAC 17666 - The site has a port-a-potty but has no hand washing facilities. Hand washing facilities have been provided and placed near the port-a-potty.

d. CAC 17667 - No portable water is supplied to site personnel. Canteens have been issued to the people working at the sanitary fill.

e. CAC 17708 - The Southern Section has no drainage ditches. Drainage ditches have been graded to allow drainage.

f. CAC 17751 - The site is overdue for its five year engineering review. As this fill will soon be closing the engineering review will be prepared at closing.

If there are any questions, or if further information is desired please let us know.

Sincerely,

Leo M. Laska
Lieutenant Colonel, Corps of Engineers
Director, Engineering and Housing

Copies Furnished:

Walter Wong, Monterey County Health Department

STATE OF CALIFORNIA

GEORGE DEUKMEJIAN, Governor

CALIFORNIA WASTE MANAGEMENT BOARD
1020 NINTH STREET, SUITE 300
SACRAMENTO, CA 95814

H2.E

OCT 02 1986

Leo M. Laska
Lieutenant Colonel, Corps of Engineers
Director, Engineering and Housing
Fort Ord, CA 93941-5000

Subject: Fort Ord Sanitary Landfill 27-AA-15

Dear Colonel Laska:

Thank you for your letter of September 22, 1986 concerning compliance efforts at the Fort Ord Sanitary Landfill. The installation of hand washing facilities and issuance of canteens should be sufficient to prevent a second violation of Sections 17666 and 17667, Title 14, California Administrative Code.

We are confident that the Environmental Resources office is addressing the problems noted in our first Presley inspection and is vigilant in its own inspection program as well. We look forward to a violation free second inspection.

Sincerely,

John K. Bell, Manager
Monitoring Section

mea

+-Working File

STATE OF CALIFORNIA

GEORGE DEUKMEJIAN, Governor

CALIFORNIA WASTE MANAGEMENT BOARD
[illegible]0 NINTH STREET, SUITE 300
[illegible]CRAMENTO, CA 95814

NOV 21 1986

2nd

To: Mr. Joseph Cochran, Chief
Environmental and Natural Resources Office
Facilities Engineering
Fort Ord, CA 93941

Subject: Report of inspection: Fort Ord Sanitary Landfill
27-AA-15

Government Code Section 66796.38 requires the California Waste Management Board (Board) to conduct inspections of solid waste facilities for the purpose of evaluating compliance with the State Standards for Solid Waste Handling and Disposal (Title 14. California Administrative Code, Division 7 Chapter 3, commencing with section 17200). Under this program, each facility will be inspected at least three separate times. As you are probably aware, the subject facility received its second inspection on October 24, 1986. Enclosed please find the Evaluation Report resulting from this second inspection. Copies of photographs or slides referred to in the report are available from the Board upon written request.

The goal of our inspection program is to verify compliance with each of the State Minimum Standards, not merely to find violation(s) of these standards. In order to achieve this we will, as I stated above, be inspecting each facility at least three times. This will provide the following advantages over the previous inspection techniques:

* The program will provide greater fairness to operators of facilities by reducing the possibility that one operator will be inspected under adverse conditions and another under favorable conditions.

* The program will allow for evaluation of conditions, which show seasonal variations such as effectiveness of leachate control systems, vectors, dust, etc.

* The program will provide a track record of compliance which will be used in evaluating standards for which a single violation may not be sufficient reason to place the facility on the State List of Non-Complying Facilities when the facility is generally in compliance with that standard, i.e., the daily cover standard.

Although we do not intend to provide advance notice of the inspection dates to operators, the Local Enforcement Agency (LEA) will be notified of those dates, and will be invited to accompany our staff on the inspection.

If, after the third inspection, your facility continues to be operating in violation of one or more of the State Minimum Standards you will be notified of this finding by certified letter. A copy of that letter will be sent to the LEA. After 90 days or upon notification of correction of all violations(s), Board staff will reinspect the facility. If the facility is still in violation, staff will notify you and the LEA, by certified letter of staff's intent to recommend that the Board place the facility's name on the State List of Non-Complying Facilities at a regularly scheduled meeting of the Board. Should the Board place the facility on that list, State law (Government Code 66796.39) requires that the LEA develop a compliance schedule for correction of the violation(s). If compliance is not achieved within one year, Government Code section 66796.39 directs LEAs to revoke facility operating permits. If the facility is closed or abandoned, staff will recommend that the LEA issue a notice of violation and an order to correct the violations. That Notice and Order will also notify you or the owner of the facility that State law provides that "the unremedied condition of the facility is prima facie evidence of negligence, and in any action for damages against the owner of the property for injury caused by the unremedied condition, the burden of proving the injury was not caused by an unremedied condition shall be on the owner of the property".

If you have any questions regarding the program, please contact me at (916) 322-1769.

Sincerely,

John K. Bell, Manager
Monitoring Section

Enclosure

cc: Walter Wong, Monterey County Environmental Health

mea

CALIFORNIA WASTE MANAGEMENT BOARD

DISPOSAL SITE
EVALUATION REPORT

Facility Name: Fort Ord Sanitary Landfill **Facility ID No.:** 27-AA-15

Name of Inspector: H. Berton **Inspection Dates:** 10/24/86

Signature: H. Berton

CAC Section:	Observations:	Conclusions:
Disposal Site Information:		
17616 Report of Disposal Site Information	The current RDSI fully describes the existing operation.	Comply
Design Responsibility:		
17626 Design Responsibility	This standard applies to new facilities only.	N/A
17627 Ultimate Use	The RDSI states that the site will be used for military training use after closure.	Comply
17628 General Design Parameters	The site design accounted for all factors in Section 17628.	Comply
17629 Public Health Design Parameters	The design meets the criteria listed in Section 17629	Comply
17636 Weight/Volume Records	I reviewed the daily records which were accurate for forecasting the rate of site filling and for planning purposes. Volume records were kept at the Department of Engineering and Housing.	Comply

Section Manager JKS

Facility Name: Fort Ord Sanitary Landfill **Facility ID No.:** 27-AA-15

Name of Inspector: H. Berton **Inspection Dates:** 10/24/86

Signature: H. Berton

CAC Section:	Observations:	Conclusions:
17637 Subsurface Records	There are no subsurface records for this site. A contract with Harding Lawson Associates has been finalized. A complete report containing subsurface records is expected by August or September.	Violation
17638 Special Occurrences	As the site receives less than 100 cubic yards of waste daily, a log as special occurrences is not required.	N/A
17639 Inspection of Records	Records were available during normal business hours. All records were kept at the Department of Engineering and Housing.	Comply
Disposal Site Personnel:		
17646 Availability	The site had enough qualified personnel to properly operate the facility.	Comply
17647 Training	Training was of the on-the-job type. I observed site personnel working and no activity was restricted due to lack of training.	Comply
17648 Supervision	Larry Gore is the site supervisor. I did not see any conditions I felt were due to lack of supervision.	Comply
17649 Site Attendant	The site was attended during operating hours.	Comply
Disposal Site Improvements:		
17656 Identification Signs	As this site is located on military property and not accessible for the public, identification signs are not required.	N/A

Facility Name: Fort Ord Sanitary Landfill Facility ID No.: 27-AA-15

Name of Inspector: H. Berton Inspection Dates: 10/24/86

Signature: H. Berton

CAC Section:	Observations:	Conclusions:
17657 Entry Signs	Entry signs were present at the gate and hours of operation, and types of materials which are/are not accepted.	Comply
17658 Site Security	There is no fencing immediately next to the gate. I observed evidence of unauthorized entry to the site. (See photo II-1).	Violation
17659 Access Roads	Roads were smooth and passable and allowed good access to the site. I did not see excessive dust or tracking of material onto adjacent paved public roads. (See photo II-1).	Comply
17660 Internal Roads	Internal roads were passable and in such a condition that vehicle access and unloading were not impeded. Roads were suitably signed.	Comply
Disposal Site Health and Safety:		
17666 Sanitary Facilities	Sanitary facilities were available on site. (See photo II-2).	Comply
17667 Water Supply	Canteens were issued to people working at the site.	Comply
17668 Communications Facilities	There was a two-way radio present at the gate.	Comply
17669 Lighting	This site did not operate during hours of darkness.	Comply
17670 Personnel Health And Safety	Safety equipment and supplies were available to employees. The LEA did not require that specific safety items be used.	Comply

Facility Name: Fort Ord Sanitary Landfill **Facility ID No.:** 27-AA-15

Name of Inspector: H. Berton **Inspection Dates:** 10/24/86

Signature: H. Berton

CAC Section:	Observations:	Conclusions:
Disposal Site Operations:		
17676 Confined Unloading	Waste was confined to the active trench located northwest of the gatehouse.	Comply
17677 Spreading and Compacting	Waste was properly spread and compacted by a caterpiller.	Comply
17678 Slopes and Cuts	The slope of the working face was such that effective compaction of waste was maintained. The measured angle using a clinometer was 5 degrees which is equal to a ratio of 11.5 to 1 horizontal to vertical.	Comply
17679 Final Site Face	The final exterior surface appeared neat and finished and was of proper slope. The measured slope using a clinometer was 10 degrees which is equal to a ratio of 5.68:1 horizontal to vertical.	Comply
17680 Stockpiling	Stockpiled material is kept out of the way and does not hinder traffic movement or daily operations. The stockpiles were located directly above the trench.	Comply
17681 Availability of Cover	Cover material is available on site and, according to the RDSI, none will have to be imported.	Comply
17682 Cover	Due to time constraints I was unable to fully address this section for compliance. The next inspector should evaluate this section.	Indeterminate
17683 Performance Standards	This was not a performance standard site.	N/A

Facility Name: Fort Ord Sanitary Landfill Facility ID No.: 27-AA-15

Name of Inspector: H. Berton Inspection Dates: 10/24/86

Signature: Herbert Berton

CAC Section:	Observations:	Conclusions:
17684 Intermediate Cover	Areas identified by Josheph Cochran, Chief of Natural and Environmental Resources as intermediate cover, did not have any exposed waste. These areas were located east of the gatehouse.	Comply
17685 Final Cover	There are no areas of final cover.	N/A
17686 Scavenging	I did not observe any scavenging.	Comply
17687 Salvaging Permitted	There were no salvaging operations.	N/A
17688 Volume Reduction and Energy Recovery	Volume Reduction and Energy Recovery were not observed.	N/A
17689 Processing Area	There were no salvaging operations.	N/A
17690 Storage of Salvage	There were no salvaging operations.	N/A
17691 Removal	There were no salvaging operations.	N/A
17692 Non-Salvageable Items	I did not observe the salvage of any items defined as non-salvageable by this section.	Comply
Disposal Site Controls:		
17701 Nuisance Control	The operation did not appear to be likely to cause a public nuisance.	Comply

Facility Name: Fort Ord Sanitary Landfill Facility ID No.: 27-AA-15

Name of Inspector: H. Berton Inspection Dates: 10/24/86

Signature: H. Berton

CAC Section:	Observations:	Conclusions:
17702 Animal Feeding	I did not observe animals feeding on waste.	Comply
17703 Fire Control	Fire control is accomplished through fire breaks, water trucks, and bulldozers. I did not observe any fires or see evidence of recent fires.	Comply
17704 Leachate Control	I did not observe any surface leachate. The site has been sampling the water wells for groundwater contamination. The site is experiencing a problem with groundwater contamination and is cooperating with the Central Coast Regional Water Quality Control Board to rectify the problem. Harding Lawson Associates will begin an estensive study to determine the exact nature of the contamination.	Comply
17705 Gas Control	I monitored for gas along two places between a baseball diamond on old fill and an apartment complex. This area is across Imjin Road from the landfill. I did not find any detectable gas readings.	Comply
17706 Dust Control	I did not observe any conditions which could lead to a dust problem. A water truck is used to control excess dust.	Comply
17707 Vector and Bird Control	I did not observe any vectors at this site.	Comply
17708 Drainage and Erosion Control	I did not observe improper drainage control or inadequate erosion control.	Comply

Facility Name: Fort Ord Sanitary Landfill **Facility ID No.:** 27-AA-15

Name of Inspector: H. Berton **Inspection Dates:** 10/24/86

Signature: H. Berton

CAC Section:	Observations:	Conclusions:
17709 Contact with Water	I observed no waste in contact with water.	Comply
17710 Grading of Fill Surfaces	Grading accounted for settlement and promoted lateral runoff.	Comply
17711 Litter Control	I did not observe any accumulations of litter I felt could lead to a litter nuisance.	Comply
17712 Noise Control	Due to the isolated nature of this site I did not observe any condition which I felt could lead to a noise nuisance.	Comply
17713 Odor Control	Slight odors were detected on site but not at the site perimeter.	Comply
17714 Traffic Control	Traffic flow did not cause a public safety hazard and I did not observe vehicles stacking onto public roads.	Comply
17715 Ponded Liquid	This site did not have any ponded liquid.	Comply
Disposal Site Equipment:		
17726 General	The numbers and types of equipment on site were consistant with requirements listed in the RDSI. Equipment consists of one bulldozer and a crane to dig the trenches. (See photo II-6).	Comply
17727 Standby Equipment	Standby equipment is available from the Building and Grounds Division.	Comply

Facility Name: Fort Ord Sanitary Landfill **Facility ID No.:** 27-AA-15

Name of Inspector: H. Berton **Inspection Dates:** 10/24/86

Signature: H. Berton

CAC Section:	Observations:	Conclusions:
Disposal Site Maintenance:		
17731 General	Equipment and facility maintenance programs meet the requirements of Section 17731.	Comply
17732 Operating Site Maintenance	As there were fewer than three maintenance related sections in violation, this site complies with Section 17732.	Comply
17733 Insp. on Completion	This is not a closed site.	N/A
17734 Completed Site Maintenance	This is not a closed site.	N/A
17735 Recording	This site pre-exists the implementation of this standard and has not closed.	N/A
Disposal Site Special Wastes:		
17741 Burning Wastes	I did not observe any burning waste at this site.	Comply
17742 Hazardous Wastes	I did not observe any hazardous waste at this site.	Comply
17743 Liquid Wastes	I did not observe any liquid waste being received at the site.	Comply
17744 Dead Animals	I did not observe any dead animals at this site.	Comply

Facility Name: Fort Ord Sanitary Landfill **Facility ID No.:** 27-AA-15

Name of Inspector: H. Berton **Inspection Dates:** 10/24/86

Signature: H. Berton

CAC Section:	Observations:	Conclusions:
Disposal Site Reports and Reviews:		
17751 Periodic Site Review	The site is overdue for its five year engineering review. The last site review was in 1977-78.	Violation

Notes:

SWIS-03 (REV. 1/85)

NOTICE OF INSPECTION DISPOSAL SITE

LOCAL ENFORCEMENT AGENCY: _____

FACILITY FILE NUMBER (COUNTY LEA NUMBER)	PROGRAM CODE	INSPECTION DATE (MM DD YY)	T-OUT / T-IN	TOTAL TIME (DECIMAL HOURS)
27 - AA - 15	P	(1011) 10/24/86		(1031) II

FACILITY NAME: Fort Ord Sanitary Landfill

FACILITY LOCATION:

INSPECTOR: H. Burton

ALSO PRESENT: Joseph Cochran

RECEIVED BY:
Operator _____
Owner _____

Comments: 17658 - Site Security - Break in fencing should be fixed.
17751 - Permit Site Review - Overdue and should commence.

IND - Indeterminate

(3011) RECORDS (V ☐ C ☒)
- ☐ ACCURATE WEIGHT/VOLUME RECORDS MAINTAINED 17636
- ☐ ADEQUATE SUBSURFACE RECORDS MAINTAINED 17637
- ☐ LOG OF SPECIAL OCCURRENCES MAINTAINED 17638
- ☐ RECORDS AVAILABLE FOR INSPECTION 17639

(3021) PERSONNEL (☐ ☒)
- ☐ ADEQUATE NUMBER OF QUALIFIED PERSONNEL AVAILABLE 17646
- ☐ PERSONNEL ADEQUATELY TRAINED 17647
- ☐ ADEQUATE SUPERVISION PROVIDED 17648
- ☐ SITE ATTENDANT AVAILABLE FULL-TIME OR AS DETERMINED BY LEA 17649

(3031) SIGNS (☐ ☒)
- ☐ IDENTIFICATION SIGNS AT EACH POINT OF ACCESS 17656
- ☐ ENTRY SIGN STATES FEES, HOURS OF OPERATION, WASTES ACCEPTED/NOT ACCEPTED 17657
- ☐ NON-HAZARDOUS UNATTENDED SITES HAVE SIGN WARNING USERS OF UNAVAILABILITY OF COMMUNICATION FACILITIES 17658

(3041) SECURITY (☒ ☐)
- ☐ ADEQUATE PERIMETER SECURITY, HAZARDOUS AREAS FENCED AND IDENTIFIED 17658

(3051) ROADS (☐ ☒)
- ☐ ACCESS ROADS HAVE SMOOTH SURFACE, MINIMIZE DUST AND TRACKING OF MUD, AND ALLOW ALL-WEATHER ACCESS 17659
- ☐ INTERNAL ROADS IN SAFE CONDITION, PROVIDE ACCESS DURING INCLEMENT WEATHER, AND ARE PROVIDED WITH DIRECTIONS 17660

(3071) SANITATION (☐ ☒)
- ☐ ADEQUATE SANITARY FACILITIES AVAILABLE 17666
- ☐ SAFE ADEQUATE DRINKING WATER AVAILABLE 17667

(3081) COMMUNICATIONS (☐ ☒)
- ☐ COMMUNICATION FACILITIES AVAILABLE WHERE HAZARDOUS WASTES ARE ACCEPTED 17668

(3091) LIGHTING (☐ ☒)
- ☐ LIGHTING ADEQUATE 17669

(3101) SAFETY (☐ ☒)
- ☐ SAFETY EQUIPMENT IN USE AND BEING WORN 17670

(3111) CONFINED UNLOADING (V ☐ C ☒)
- ☐ UNLOADING ADEQUATELY CONFINED 17676

(3141) SPREADING/COMPACTING (☐ ☒)
- ☐ SPREADING AND COMPACTION IN TWO-FOOT LAYERS 17677

(3151) SLOPES/CUTS/GRADING (☐ ☒)
- ☐ WORKING FACE SLOPES ALLOW EFFECTIVE COMPACTION. DEPTH OF CUTS AND SLOPES OF TRENCH SIDES AS APPROVED BY LEA 17678
- ☐ FINAL SLOPES HAVE NEAT APPEARANCE AND ARE 1-3/4 : 1 OR FLATTER 17679
- ☐ GRADING OF FILL SURFACES ADEQUATE 17719

(3161) COVER (☐ ☒)
- ☐ STOCKPILING OF COVER DOES NOT INTERFERE WITH OPERATIONS 17680
- ☐ SUITABLE QUALITY AND SUPPLY OF COVER MATERIAL AVAILABLE 17681
- ☒ COVER PROVIDED AT REQUIRED DEPTH AND FREQUENCY 17682 IND
- ☐ INTERMEDIATE COVER PROVIDED AT REQUIRED DEPTH AND FREQUENCY 17684
- ☐ FINAL COVER PROVIDED AS REQUIRED 17685

(3171) SALVAGING/PROCESSING (☐ ☐)
- ☐ SCAVENGING PROHIBITED 17686
- ☐ SALVAGING DOES NOT INTERFERE WITH OPERATIONS 17687
- ☐ VOLUME REDUCTION AND ENERGY RECOVERY DO NOT INTERFERE WITH OPERATIONS OR CREATE HEALTH, SAFETY OR ENVIRONMENTAL PROBLEMS 17688
- ☐ SALVAGING AND VOLUME REDUCTION CONFINED TO CLEARLY IDENTIFIED AREAS 17689 N/A
- ☐ SALVAGE STORAGE LOCATION OK, VOLUME AS APPROVED BY LEA, MINIMIZES FIRE, NUISANCE 17690
- ☐ SALVAGE STORAGE TIME DOES NOT RESULT IN HEALTH OR FIRE PROBLEMS 17691
- ☐ SALVAGED MATERIALS APPROVED BY LEA AND LOCAL HEALTH 17692

(3181) NUISANCE (☐ ☒)
- ☐ OPERATIONS DO NOT CREATE A PUBLIC NUISANCE 17701
- ☐ FEEDING OF REFUSE TO ANIMALS FOR HUMAN CONSUMPTION PROHIBITED 17702

(3191) FIRE (V ☐ C ☒)
- ☐ FIRE CONTROL ADEQUATE 17703

(3192) FIRE (P) (☐ ☐)
- ☐ BURNING MATERIALS SPREAD AND EXTINGUISHED. LEA, SWMB NOTIFIED IMMEDIATELY OF FIRE NOT EXTINGUISHED IN 24 HOURS 17683 N/A

(3201) LEACHATE (☐ ☒)
- ☐ ADEQUATE STEPS TAKEN TO MONITOR, COLLECT, TREAT, AND DISPOSE OF LEACHATES 17704
- ☐ NO WASTES IN DIRECT CONTACT WITH WATER EXCEPT AS APPROVED BY RWQCB 17709

(3202) LEACHATE (P) (☐ ☐)
- ☐ REFUSE COVERED WITH NEXT DAY'S REFUSE OR WITH SIX INCHES OF COMPACTED SOIL. TOTAL AREA OF EXPOSED REFUSE IS AS SPECIFIED FOR WET AND DRY SEASONS 17683 N/A

(3211) GAS (☐ ☒)
- ☐ GAS MONITORING AND CONTROL AS REQUIRED 17705

(3221) DUST (☐ ☒)
- ☐ DUST CONTROL ADEQUATE 17706

(3231) VECTORS/BIRDS (☐ ☒)
- ☐ VECTOR AND BIRD CONTROL ADEQUATE 17707
- ☐ LIQUID PONDS MINIMIZE VECTOR PROPAGATION 17715

(3232) VECTORS (P) (☐ ☐)
- ☐ THRESHOLD VALUES FOR VECTOR POPULATIONS NOT EXCEEDED 17683 N/A

(3241) DRAINAGE/EROSION (☐ ☒)
- ☐ DRAINAGE AND EROSION CONTROL ADEQUATE 17708

(3251) LITTER (☐ ☒)
- ☐ LITTER CONTROL ADEQUATE 17711

(3252) LITTER (P) (☐ ☐)
- ☐ LITTER NOT ALLOWED TO MIGRATE OFF-SITE 17683 N/A

(3261) NOISE (☐ ☒)
- ☐ NOISE CONTROL ADEQUATE 17712

(3271) ODOR (☐ ☒)
- ☐ ODOR CONTROL ADEQUATE 17713

(3272) ODOR (P) (☐ ☐)
- ☐ AMBIENT AIR AT OR BEYOND FACILITY BOUNDARY IS NOT ODOROUS 17683 N/A

(3281) TRAFFIC (V ☐ C ☒)
- ☐ TRAFFIC CONTROL ADEQUATE WITHIN SITE. TRAFFIC MINIMIZES INTERFERENCE, SAFETY PROBLEMS, AND STACKING ON PUBLIC ROADS 17714

(3291) EQUIPMENT (☐ ☒)
- ☐ EQUIPMENT ADEQUATE IN TYPE, CAPACITY, AND NUMBER, AND IS ADEQUATELY MAINTAINED 17726
- ☐ STANDBY EQUIPMENT AVAILABLE TO COMPLY WITH SEC. 17682 AND OTHER SECTIONS 17727

(3301) MAINTENANCE (☐ ☒)
- ☐ EFFECTIVE MAINTENANCE PROCEDURES AND PROGRAMS DEVELOPED AND UTILIZED 17731
- ☐ ADEQUATE MONITORING AND REPAIR OF DETERIORATED CONDITIONS 17732

(3311) CLOSURE (☐ ☐)
- ☐ AFTER CLOSURE, IF LEACHATE, EXTENSIVE SURFACE CRACKING OR SETTLEMENT OCCURS, THE OWNER SHALL NOTIFY LEA AND SHALL MONITOR AND REPAIR SITE FOR A PERIOD OF 3 YEARS OR LONGER 17734 N/A
- ☐ UPON SITE CLOSURE, DETAILED DESCRIPTION MUST BE FILED WITH THE LEA AND WITH THE COUNTY RECORDER 17735

(3321) SPECIAL WASTES (☐ ☒)
- ☐ BURNING WASTES IMMEDIATELY SPREAD AND EXTINGUISHED IN SAFE AREA 17741
- ☐ SITE ACCEPTS ONLY APPROVED HAZARDOUS WASTES AND TAKES PRECAUTIONS TO ELIMINATE OR CONTROL HARMFUL DUSTS, FUMES, MISTS, VAPORS, OR GASES 17742
- ☐ LIQUID WASTES APPROVED BY RWQCB, LOCAL HEALTH ENTITY AND LEA 17743
- ☐ DEAD ANIMALS ALLOWED BY LOCAL REGULATIONS 17744

(3331) OTHER (☒ ☐)
- ☑ 17751 - Permit Site Review

*V = Violation
C = Compliance

DISTRIBUTION: WHITE — CWMB YELLOW — OPERATOR PINK — LEA

STATE OF CALIFORNIA GEORGE DEUKMEJIAN, Governor

CALIFORNIA WASTE MANAGEMENT BOARD
1020 NINTH STREET, SUITE 300
SACRAMENTO, CA 95814

To: Joe Cochran, Chief
Environmental Natural Resources
Facilities Engineering
Fort Ord, CA &zip&

Subject: Report of Inspection: Fort Ord Sanitary Landfill 27-AA-15

Government Code Section 66796.38 requires the California Waste Management Board (Board) to conduct inspections of solid waste facilities for the purpose of evaluating compliance with the State Standards for Solid Waste Handling and Disposal (Title 14. California Administrative Code, Division 7 Chapter 3, commencing with section 17200). Under this program, each facility will be inspected at least three separate times. As you are probably aware, the subject facility received its third inspection on 1/12 & 14/87. Enclosed please find the Evaluation Report resulting from this third inspection. Copies of photographs or slides referred to in the report are available from the Board upon written request.

Results of the three field inspections along with all pertinent supporting data in our files have now undergone staff review. A final staff report is currently being prepared and will be sent to you as soon as possible. We are concerned with the following repeated and/or uncorrected violations of State Minimum Standards:

17616 - Report of Disposal Site Information
17637 - Subsurface Records
17658 - Site Security
17708 - Drainage and Erosion Control
17751 - Periodic Site Review

At the March meeting of the California Waste Management Board tentatively scheduled for March 26-27, 1987, staff will report on its evaluation of the subject facility. Staff will recommend that the Board direct you to take specific corrective actions to gain compliance with State Minimum Standards. If the Board accepts this recommendation, you will be directed to submit a letter to the Board within 30 days stating specific dates for initiating and completing the corrective actions.

If this letter is not received by the Board within 30 days, or if the dates for implementing the required actions are not met, progress towards compliance will be deemed unsatisfactory. Verification of all deadlines will be made through additional staff inspections as necessary. If at any time progress is deemed unsatisfactory, a 90 day notice will be issued by the Chief Executive Officer stating the Board's intent to place the site on the State List of Non-Complying Facilities.

You should be aware that the Board may direct staff to issue a 90 day notice of it's intent to list the site rather than allow for additional time for compliance as recommended by staff.

You are invited to address the Board with any information you feel the Board should consider at its March meeting. A notice of the meeting will be sent at least 10 days prior to the scheduled date.

A copy of this letter and the enclosed report will be sent to the LEAs. If you have any questions regarding this program, please contact me at (916) 322-1769.

Sincerely,

Kenny D Vera
for
John K. Bell, Manager
Monitoring Section

cc: Mary Anne Dennis-Bannister, Monterey County Health Department

mea

CALIFORNIA WASTE MANAGEMENT BOARD

SOLID WASTE FACILITY
EVALUATION REPORT

Facility Name: Fort Ord Sanitary Landfill Facility ID No.: 27-AA-15

Name of Inspector: Martha Vazquez Inspection Dates: 1/12 & 14/87

Signature: Martha Vazquez

LEGEND

C = Compliance V = Violation
I = Indeterminate N = Not Applicable

CAC	SECTION	OBSERVATIONS	RESULT
		DISPOSAL SITE INFORMATION	
17616	Report of Disposal Site Information.	I reviewed the RDSI, dated 1977, and found the following inconsistancies: 1. There are multiple housing units within 1000 feet of the site boundaries. The RDSI states, "There are no structures within 1000 feet of the landfill site." 2. I observed eleven, 3 cubic yard piles of dry sewage sludge deposited on top of intermediate fill areas. The RDSI specifies that sewage sludge is to be dried in beds and then deposited in the demolition landfill.	V

Section Manager

CAC	SECTION	OBSERVATIONS	RESULT
		DESIGN RESPONSIBILITY.	
17626	Design Responsibility	This standard applies to new facilities that were permitted after 1977. As this site commenced operations in 1974, this section is not applicable.	N
17627	Ultimate Use.	The RDSI, dated 1977, states that land use will be reverted back to training use following the closure of this site.	C
17628	General Design Parameters.	The site design accounted for all factors listed in Section 17628.	C
17629	Public Health Design Parameters	The design of this facility meets all criteria listed in Section 17629.	C
		DISPOSAL SITE RECORDS.	
17636	Weight/Volume Records.	Records of the volume of waste received at this site were made available to me. I reviewed records for October - December 1986 and calculated an average of 51.3 cubic yards of waste was received per day.	C
17637	Subsurface Records.	Subsurface records are not maintained by the operators of this site. Joseph A. Cochran, Chief, Fort Ord Environmental and Natural Resources Office, advised me that subsurface information currently does not exist. This information is being defined through a study being made by Harding Lawson Associates. The consultants report is due in September 1987.	V
17638	Special Occurrences.	A log of special occurrences is required of sites receiving greater than 100 cubic yards of waste per operating day. As this site receives less than this amount, this section is not applicable.	N

Inspector: M. Vasquez

CAC	SECTION	OBSERVATIONS	RESULT
17639	Inspection of Records.	Records were made immediately available to me at the Fort Ord Department of Engineering and Housing Office.	C
		DISPOSAL SITE PERSONNEL.	
17646	Availability.	Two full time employees operate this site. No operation appeared to be restricted by a lack of personnel.	C
17647	Training.	Site employees receive on the job training. I observed that no activity was restricted because of a lack of training.	C
17648	Supervision.	Earl Blair is the site supervisor. He was on site the day of this inspection. I did not see any adverse conditions due to a lack of supervision.	C
17649	Site Attendant.	This site was properly attended. There was an attendant at the gatehouse and an operator at the working face.	C
		DISPOSAL SITE IMPROVEMENTS.	
17656	I.D. Signs.	This site is located on military property and is only accessed by military personnel. As this site is not used by the general public, this section is not applicable.	N
17657	Entry Signs.	Entry signs were present at the main gate. The signs displayed the hours of operation, and the types of material which are/are not accepted. (See slides III.1 and III.2).	C

Inspector: M Vázquez

CAC	SECTION	OBSERVATIONS	RESULT
17658	Site Security.	1. I observed that there was no fencing on either side of the main gate. The small berms that are present are inadequate in preventing unauthorized entry as I saw a jogger exit the site over the berm at 0700 on 1/12/87. (See slides III.3 and III.4). 2. There was no fence or topographic barrier on the eastern perimeter of the site. This area is adjacent to a community park.	V
17659	Access Roads.	The major access road was smooth and surfaced with asphalt. This roadway allowed safe access for all vehicles.	C
17660	Internal Roads.	Internal roads were surfaced with earth. They were smooth and allowed safe access to all active site areas.	C
		DISPOSAL SITE HEALTH AND SAFETY.	
17666	Sanitary Facilities.	Sanitary facilities were available on site. They included a chemical toilet and a wash basin. (See Slide III.5).	C
17667	Water Supply.	Canteens are issued to site employees.	C
17668	Communication Facilities.	There were no communication facilities present at this site. The engineering office is less than a five minute drive away and a telephone is available should an emergency situation arise.	C
17669	Lighting.	As this site does not conduct operations during hours of darkness this section is not applicable.	C
17670	Personnel Health and Safety.	Site personnel are issued hearing protection, hard hats, safety shoes, goggles, and particle masks. The LEA does not require the use of any specific safety equipment.	C

Inspector: M Vaquez

CAC	SECTION	OBSERVATIONS	RESULT
		DISPOSAL SITE OPERATIONS.	
17676	Confined Unloading.	All waste was unloaded into a tipping trench. The trench was well confined and correct in size for the number of vehicles using this site.	C
17677	Spreading and Compacting.	On inspection date 1/14/87, I observed that all waste was thoroughly spread and compacted. (On inspection date 1/12/87, the Caterpiller tractor was inoperable and compaction did not take place.)	C
17678	Slopes and Cuts.	I observed that the slope of the working face was less than five degrees (11.5 : 1.00 horizontal to vertical ratio). This angle allowed effective compaction of all waste. (See slide III.6).	C
17679	Final Site Face.	The final exterior surface of final cover areas were observed to have a neat, finished appearance with no waste daylighting from the surface. I observed that no final slope was greater than seven feet in height. The slope of final cover areas was determined to correctly meet Standard specifications by previous inspectors. Final cover areas are shown on the attached aerial map shot by Harding Lawson Associates.	C
17680	Stockpiling.	A stockpile of cover material was located just north of the tipping trench. Its location did not interfere with other site activities.	C
17681	Availability of Cover.	Cover material is available on site. The RDSI states cover material should be available for the duration of the site's life.	C

Inspector: M Vazquez

CAC	SECTION	OBSERVATIONS	RESULT
17682	Cover.	On inspection date 1/12/87, I observed that cover material was not applied over refuse. The site Caterpiller tractor was inoperable and standby equipment was not available to place cover material over waste.	V
17683	Performance Standards.	As this site does not operate under performance standards, this section is not applicable.	N
17684	Intermediate Cover.	Intermediate cover areas were identified by Jack Massera, Management Agronomist. I observed that all intermediate cover area were well covered and had no daylighting of waste. See slides III.7. See Section 17708-Drainage and Erosion Control and Section 17732-Operating Site Maintenance.	C
17685	Final Cover.	I observed no waste daylighting from any final cover area. Final cover areas are shown on the attached aerial map shot by Harding Lawson Associates.	C
17686	Scavenging.	I did not observe scavenging at this facility.	C
17687	Salvaging Permitted.	Salvaging operations are not conducted at this site. This section is not applicable.	N
17688	Volume Reduction and Energy Recovery.	Neither Volume Reduction nor Energy Recovery operations are conducted at this site. This section is not applicable.	N
17689	Processing Area.	Salvaging operations are not conducted at this facility. This section is not applicable.	N
17690	Storage of Salvage.	Salvaging operations are not conducted at this site. This section is not applicable.	N

Inspector: M Vazquez

CAC	SECTION	OBSERVATIONS	RESULT
17691	Removal.	Salvaging operations are not conducted at this site. This section is not applicable.	N
17692	Non-Salvageable Items.	I did not observe the salvage of any item considered non-salvagable by this section.	C
		DISPOSAL SITE CONTROLS	
17701	Nuisance Control.	I did not observe any potential or existing nuisance problems at this site.	C
17702	Animal Feeding.	I did not see evidence of animal feeding on site.	C
17703	Fire Control.	There were roads serving as fire breaks around the working face, and around all fill areas. There was a dozer available on site to push cover material over ignited material, although the dozer was not operable the day of this inspection.	C
17704	Leachate Control.	I did not observe surface leachate at this site. Bert Van Vorris and Vern Jones, of the Central Coast Regional Water Quality Control Board (RWQCB), advised me by telephone of the following: 1. Very sandy soil is used as cover at this site. Because of this, most surface water penetrates and does not runoff. 2. No surface leachate has been observed at this site. 3. Solvents have been detected in ground water and the site has been instructed to install monitoring wells and conduct backgrounds on existing wells. Soil gas tests are also being conducted to determine possible "hot spots" in fill areas.	C

Inspector: M Vazquez

CAC	SECTION	OBSERVATIONS	RESULT
17704	Leachate Control (Continued)	4. The site is operating under a RWQCB Cleanup and Abatement Order. The site operators are currently complying with the ordered time schedule. Based on my observations and discussion with the RWQCB, I have found that the operators of this facility have initiated measures to monitor leachate and are currently in compliance with this section. Note: The following agencies are involved with the groundwater contamination problem that may possibly be associated with this facility: John Jenning, Hazardous Material Specialist, Monterey County Health Department; Andy Burrows, Department of Health Services Toxics Division; Harding Lawson Associates; and Bert Van Vorris, RWQCB Toxics Division.	
17705	Gas Control.	I tested for gas at this site with a Gas-Tech, Model NP-204, and a bar hole punch. There are many fill areas located within 1000 feet of homes. I tested the areas indicated at on the attached map and detected no gas.	C
17706	Dust Control.	This site was not dusty the day of my inspection.	C
17707	Vector and Bird Control.	I did not observe vectors at this site. The small number of birds present did not constitute a public nuisance.	C
17708	Drainage and Erosion Control.	In the intermediate cover area of this site I observed that settling had occured where past trenches had been excavated and filled. The settling has created depressions that prevent lateral runoff of water. This area should be regraded. (See slides III.8 - III.12).	V

Inspector: M Vazquez

CAC	SECTION	OBSERVATIONS	RESULT
17709	Contact with Water.	I did not observe waste in contact with water at this facility.	C
17710	Grading of Fill Surfaces.	I did not observe any problems associated with improper graded at this site. All slopes were correctly graded to promote runoff of surface water.	C
17711	Litter Control.	I did not observe any litter blown off site or an excessive accumulation of litter on site.	C
17712	Noise Control.	I did not detect noise levels that would cause a public nuisance or noise hazard at this site.	C
17713	Odor Control.	I detected garbage odors at the active face, but none at the site perimeter.	C
17714	Traffic Control.	Traffic flow did not appear to cause a public safety hazard. I did not observe vehicles stacking onto public roads.	C
17715	Ponded Liquid.	This section is not applicable. I did not observe ponded liquid at this site.	N
		DISPOSAL SITE EQUIPMENT.	
17726	General.	Equipment used at this site was consistent with what is required by the RDSI. There was a bulldozer available on site and it was correct for operating a site of this size.	C

Inspector: M. Vazquez

CAC	SECTION	OBSERVATIONS	RESULT
17727	Standby Equipment.	I arrived at the site at 0800 on Monday, 1/12/87, and observed a large amount of waste in the tipping trench. I was informed that the waste had not been covered for a couple of days because the Caterpiller tractor was inoperable and no standby equipment was available. Waste was not covered at the end of inspection day 1/12/87. The RDSI states that cover must be applied daily unless equipment breaks down, then waste must be covered within 48-hours. In this case I determined that waste was not covered within, at least, 72 hours. (See slides III.13 - III.15).	V
		DISPOSAL SITE MAINTENANCE.	
17731	General.	Equipment and facility maintenance programs were effective. Facility maintenance is ongoing and equipment receives routine maintenance.	C
17732	Operating Site Maintenance.	I observed several small, grave-like, ditches excavated in the intermediate cover area. The ditches were approximately six feet long, two and one half feet wide, and two deep. Jack Massera, Management Agronomist did not know when or why the ditches had been excavated. The ditches should be filled to prevent ponding on fill surfaces.	V
17733	Inspection on Completion.	This section is not applicable. This is not a closed site.	N
17734	Completed Site Maintenance.	This section is not applicable. This is not a closed site.	N
17735	Recording.	This section is not applicable as this site has not closed and it commenced operation in 1974, prior to the implementation of this standard.	N

Inspector: M. Vazquez

CAC	SECTION	OBSERVATIONS	RESULT
		DISPOSAL SITE SPECIAL WASTES.	
17741	Burning Wastes.	I did not observe burning waste at this site.	C
17742	Hazardous Wastes.	I did not observe hazardous waste received at this site. See "Notes" at the end of this evaluation.	C
17743	Liquid Wastes.	The RDSI prohibits liquid waste at this site. I did not observe liquid waste received at this facility during my inspection.	C
17744	Dead Animals.	I did not observe dead animals received at this site the day of my inspection.	C
		DISPOSAL SITE REPORTS AND REVIEWS.	
17751	Periodic Site Review.	The permit for this site was approved on 1/04/78. An engineering review was due on 1/11/83. This facility is overdue in submitting a review.	V

NOTES

1. During portions of this interview I was accompanied by Jack Massera, Management Agronomist.

I conducted inspection interviews with Mary Dennis-Bannister, R.S., Solid Waste Management Specialist, County of Monterey Department of Health; Joseph A. Cochran, Chief, Fort Ord Environmental and Natural Resources Office; Bert Van Vorris and Vern Jones, Central Coast Regional Water Quality Control Board.

3. The weather was cold and clear on both inspection dates.

4. This site will cease operations sometime this year. Plans for formal closure are dependent on reports from

Inspector: M. Vazquez

CAC	SECTION	OBSERVATIONS	RESULT
NOTES (Cont.)		consultants and recommendations from concerned agencies. Formal closure is expected in three years. 5. During my inspection I observed the following hazardous waste containers located in the Fort Ord Demolition Landfill, Facility Number 27-AA-014. The containers held only residual amounts of substances (see slides N.1 - N.7): 1. One 55 gallon drum of Trichloroethane. 2. One 55 gallon drum of Lube Oil Gear. 3. One 55 gallon drum of unknown substance. 4. Nine 5 gallon containers of Lube Oil. 5. One 55 gallon with "Flammable Liquid" label. Contents unknown. 6. One 55 gallon drum Morpholine. The County of Monterey Health Officer and the Monterey County Board of Supervisors were notified of a possible hazardous waste discharge as required by Proposition 65. Bob Decker, Fort Ord Environmental and Natural Resources Office, Toxics Section, and Paul Kevin, Department of Health Services, Toxics Division were also advised of the incident.	

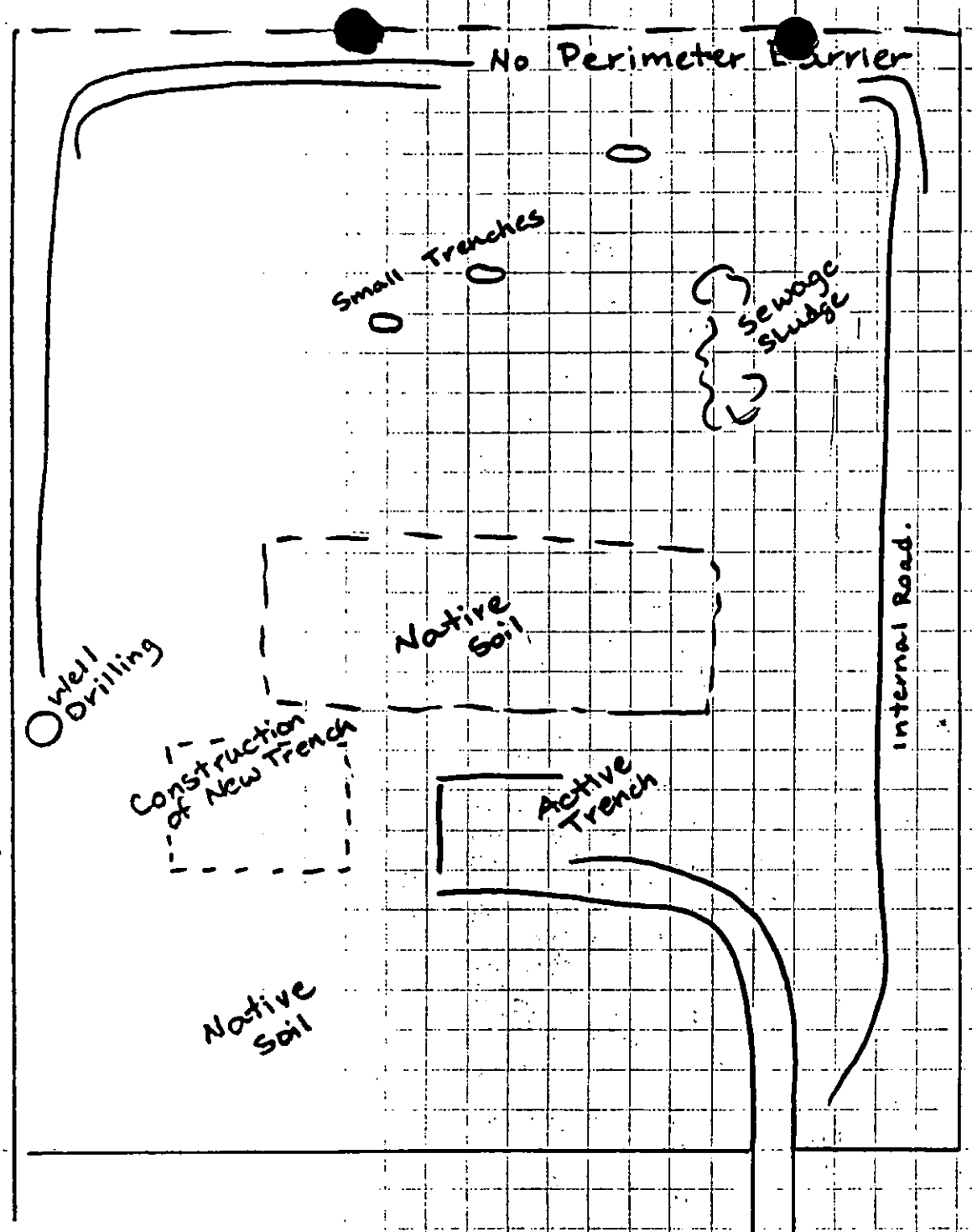
Inspector: M. Vazquez

Fort Ord Sanitary L.F. #27AA0015

M[illegible] #2

M. Va[illegible]

X = Areas tested for Gas



MAP (not to scale)

Fort Ord Sanitary Landfill
27-AA-015
Inspection Date 1/12 + 14/87
M. Vazquez

Entry Road

Gatehouse

← N

Main Gate

CALIFORNIA WASTE MANAGEMENT BOARD

AGENDA ITEM #12

MARCH 26 - 27, 1987

Item:

Selection of contractor for the preparation of guidelines for the design, construction, and operation of leachate and gas monitoring and control systems.

Key Issues:

- At its October 10, 1986 meeting the Board approved issuance of an RFP to prepare guidelines for the design, construction, and operation of leachate and gas monitoring and control systems.
- The RFP was issued on December 16, 1986 and seven proposals were received by the January 28, 1987 deadline.
- A staff committee evaluated the proposals using procedures outlined in the RFP and has rated the proposal submitted by SCS Engineering as the best submittal.
- Staff recommends that the Board adopt staff committee's recommendation and authorize the Executive Officer to negotiate a contract with SCS Engineering for an amount not to exceed $50,000.

Background:

At its October 10, 1986 meeting, the Board approved the issuance of a Request for Proposals (RFP) to prepare guidelines for the design, construction, and operation of leachate and gas monitoring and control systems. The RFP (for a maximum of $50,000) was issued on December 16, 1986 and the deadline for proposal submittal was January 28, 1987.

Seven proposals were received by the 4:45 p.m. deadline on January 28. A list of respondents and one copy each of the proposals were transmitted to the Board members by a memorandum dated February 4, 1987.

A staff evaluation committee was formed to score the seven proposals in accordance with the evaluation and selection process contained in the RFP. The staff evaluation committee consisted of Herb Iwahiro, Alan Oldall, and John Rowden.

The attached resolution contains the names of the seven proposers, the average total score received my each proposer, and the rank established by the average total score. SCS Engineering received the highest score and was therefore rated as the best proposal by the staff evaluation committee.

Board Options:

1. Adopt the ratings and rankings of the staff evaluation committee. This is the recommended option. All seven proposals were carefully reviewed by the committee using the criteria published in the RFP. These ratings and rankings represent the staff's best analysis of the proposals.

2. Adopt revised ratings and rankings for the proposals. If the Board chooses this option, it must do so within the procedures described in Section VI B 3 b of the RFP which states:

   "b. If the Board does not accept the recommendation of the Evaluation Committee it may adopt its own evaluations, scores, and rankings of the proposers. Such evaluation scores, and rankings may also include the adoption for some proposals of the same total scores as those given by the Evaluation Committee. Such evaluation scores, and rankings may also include the adoption for some proposals of scores which differ from those recommended by the Evaluation Committee".

   Whatever selection method is adopted, the proposer receiving the highest rating and ranking will be selected as the successful bidder.

3. <u>Take No Action</u>

   If no action is taken to adopt ratings and rankings at this meeting, no contract can be awarded at this time. The Board could postpone action to provide its members additional time to consider the proposals.

Recommendation:

It is recommended that the Board pass Resolution 87-15 adopting the ratings and rankings of the staff evaluation committee, and authorizing the Executive Officer to negotiate and execute an agreement with SCS Engineering for an amount not to exceed $50,000.

Attachments:

1. List of Average Scores Per Rating Fact
2. Copy of the Request for Proposals
3. Proposal Rating Sheet
4. Resolution #87-15

Attachment #1

AVERAGE SCORES PER RATING FACTOR

		SCS	EMCON	CH2HILL	LOCKMAN	ESE	CONVERSE	EDERRA
Content	(35)	33	33	35	29	30	30	27
Qualifications								
Project Mngr.	(15)	14	14	14	13	14	14	13
Project Team	(10)	10	10	9	9	9	9	9
Past Work								
Related	(40)	40	39	39	34	33	30	28
Quality	(20)	20	20	19	17	19	17	17
Product	(10)	10	10	9	7	8	6	6
Ref.	(10)	10	10	9	7	8	6	6
Travel Cost								
Schedule	(10)	10	10	10	10	10	10	10
Cost	(40)	34	34	34	40	35	34	34
Small Business	(2)	0	0	0	0	0	0	0
Schedule	(10)	10	10	10	10	10	10	10
TOTALS	(202)	191	190	188	176	176	166	160

Attachment #2

CALIFORNIA WASTE MANAGEMENT BOARD

REQUEST FOR PROPOSALS

Preparation of Guidelines

for the

Design, Construction, and Operation

of Landfill Leachate and

Gas Monitoring and Control Systems

December 16, 1986

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VIII.	Limitations	11
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Attachment A: Sample Contract
Attachment B: Proposal Rating Sheet
Attachment C: Cost Proposal Format

CALIFORNIA WASTE MANAGEMENT BOARD

Request for Proposals
Preparation of Guidelines for the Design, Construction and Operation of Landfill Leachate and Gas Monitoring and Control Systems

I. Introduction

The California Waste Management Board is the lead State agency responsible for nonhazardous waste management in California. It has overall responsibility in assuring that non hazardous wastes are collected and disposed of in a manner so as to protect the public health, safety, and the environment.

General requirements regarding the control of leachates and landfill gases are specified in the California Administrative Code, Title 14, Division 7, Chapter 3. Section 17704 require that landfill operators take "adequate steps to monitor, collect, treat and effectively dispose of leachates," and Section 17705 outlines procedures and responsibilities in defining, monitoring, and controlling landfill gas migration. In order to more effectively carry out the requirements of the law and to assure that regulations are administered consistently throughout the State, it is helpful to outline appropriate guidelines for local enforcement agencies for the design, construction and operation of leachate and gas monitoring and control systems. The preparation of such guidelines for leachate and gas monitoring and control systems, is the subject of this RFP.

II. Purpose and General Requirements

As stated in Section I, the purpose of this Request for Proposals (RFP) is, through a competitive selection process, to solicit proposals for the preparation of guidelines for the design, construction and operation of leachate and gas monitoring and control systems. The RFP is soliciting proposals for a fixed price contract. Any contract award made under this RFP will be made to the responder submitting the proposal which obtains the highest number of points pursuant to the procedures and methods set forth in Section VI., **Evaluation.**

This RFP does not contain a "low bid" selection process, and any contract award made hereunder will not be based on the lowest bid, but on the evaluation and selection process referenced above.

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Proposal preparation costs shall not be reimbursed under this contract. Proposals received within the prescribed deadline shall become the property of the Board and all rights to the content therein shall become the property of the Board.

III. Small Business Preference

NOTICE TO ALL BIDDERS: Section 14835 et seq., of the California Government Code requires that a five percent preference be given to bidders who qualify as a small business. The rules and regulations of this law, including the definition of a small business for the delivery of services, are contained in Title 2, California Administrative Code, Section 1896 et seq. A copy of the regulations is available upon request from the State office of Small and Minority Business. To claim the small business preference, which may not exceed $50,000 for any bid, your firm must have its principal place of business located in California and be verified by the State Office of Small and Minority Business. Questions regarding the preference approval should be directed to that office at (916) 322-7122.

IV. Description of Work

A. Tasks

The contractor selected by this process will prepare a manual that contains guidelines for design, construction, and operation of leachate and landfill gas monitoring and control systems. In preparing this manual, the contractor will thoroughly research existing system design, construction, and operation and maintenance histories to provide a basis for the guidelines. Proposals by prospective contractors should include a listing and pertinent data (location, owner, operator, number of years in operation, etc.) regarding existing facilities which are proposed to be researched as a part of this investigation. Access to the required information from the owner/operators of the facilities to be investigated should also be discussed in the proposals.

In addition, the contractor will utilize other resources in developing the guidelines including consultation with appropriate regulatory agencies. Although the purpose for the guidelines is to assist the California Waste Management Board and others in carrying out the requirements of the previously mentioned sections of the California Administrative Code, the guidelines will be compatible with Subchapter 15 administered by State Water Resources Control Board and with the Calderon Guidelines (Solid Waste Assessment Test Guidance dated March 1986 prepared by the State Water Resources Control Board and Draft Municipal Landfill Gas Testing Guidelines dated October 27, 1986 prepared by the State of California, Air Resources Board).

The two subjects, leachate and landfill gas, will be covered in separate sections of the document. The document will be designed for use by local enforcement agencies in reviewing and approving the installation of leachate and landfill gas monitoring and control systems. The document may also be used by landfill owners and operators, consultants, contractors and others in designing, constructing, and operating monitoring and control systems. However, it is emphasized that the finished product is to be used primarily by local enforcement agencies (generally the local health departments) and therefore the text and illustrations should be designed for use by non-engineering personnel.

As a minimum, the manual will contain the following:

1. **Leachate Monitoring and Control Systems**

   a. Monitoring system's design, construction practices and operation

      - Description of groundwater monitoring systems including single well nests or clusters
      - Description of vadose zone monitoring systems
      - Design guidelines and specifications including placement of wells, well diameter and depths
      - Well construction guidelines and specifications including drilling methods and procedures, geologic logging, casing sizing, gravel pack design, well screen design, casing material, design of seals, and surface construction.

   b. Monitoring Program

      - Monitoring well development
      - Monitoring parameters
      - Monitoring equipment
      - Sampling procedures and techniques
      - Sampling frequency
      - Field and laboratory analysis
      - Interpretation and presentation of data

c. Leachate Control Systems

- o Description of systems and their application
- o Design guidelines and specifications for leachate barrier, extraction wells, and other control systems
- o Construction practices for leachate barriers, extraction wells and other control systems
- o Specifications for pumps and appurtenant equipment
- o Leachate treatment options

d. Control systems operation and maintenance

2. **Landfill Gas Monitoring and Control Systems**

a. Monitoring system design, construction practices and operation

- o Description of system
- o Design specifications including determining probe locations, minimum spacing, probe diameter and depth.
- o Well construction guidelines and specifications including pipe material, size, location and type of seals, pipe perforation requirements, type of backfill, and surface protection design.
- o Special design problems

b. Monitoring Program

- o Monitoring parameters
- o Monitoring equipment
- o Sampling procedures and techniques
- o Data recording, analysis
- o Interpretation and reporting of results
- o Methods of isolating landfill gases from other possible sources
- o Interrelationship of monitoring program and control system operation

c. Control System Design and Construction Practices

- o Types of control systems and applications
- o Design standard (well and trench) including location, size, spacing, and depth
- o Construction practices and specification (well and trench) including pipe material, pipe perforation requirements, type of backfill, and surface seals and protection.
- o Specifications for pumps and appurtenant equipment.

d. Control System Operation and Maintenance

The completed document shall include a bibliography containing pertinent references and other selected references for further appropriate reading.

B. Amount

The Board has budgeted $50,000 for the performance of the tasks described in Section IV A.

C. Term

The term of the agreement for this service shall be April 1, 1987 (or date of approval by the Department of General Services, whichever is later) through September 1, 1987.

V. Minimum Proposal Requirements

A. Deadline

All proposals must be received (NOT POSTMARKED) by no later than 4:45 P.M. on January 28, 1987 and addressed to:

California Waste Management Board
ATTN: John Rowden
1020 Ninth Street, Suite 300
Sacramento, CA 95814

Proposals received after the above time and date will not be considered and will be returned unopened to the proposer.

B. Written Requirements

Each proposal shall contain, in writing, as a minimum:

1. Identification of Prospective Contractor

The proposal shall include the name of the firm submitting the proposal, its mailing address, telephone number, and an individual to contact if further information is desired. Also, if the prospective contractor has been issued an identification number under a previous State contract, that number shall be included in the proposal.

2. Nondiscrimination

The prospective contractor must be an Equal Opportunity Employer and must be willing to comply with State Fair Employment Practices. The signature of and date affixed by the prospective contractor on the Cover Letter required by Section V.B.3., below, shall constitute a certification under penalty of perjury under the laws of the State of California that the bidder has, unless exempted, complied with the nondiscrimination program requirements of Government Code Section 12990, and Title 2, California Administrative Code, Section 8103.

3. Cover Letter and Signature

A cover letter, which shall be considered an integral part of the proposal, shall be signed by an individual(s) who is (are) authorized to bind the proposer contractually. This cover letter must indicate the title or position which the signer holds in the proposer's firm. The letter shall contain a statement to the effect that the proposal is a firm and irrevocable offer for a 90-day period. The proposal shall also provide the following: name, title, address, and telephone number of individuals with authority to negotiate on behalf of and contractually bind the company. This letter, as required by the paragraph V.B.2., above, constitutes certification by the proposer, under penalty of perjury, that the proposer complies with the California State Nondiscrimination Program requirements. An unsigned proposal or one signed by an individual not authorized to bind the proposer shall be rejected.

4. Copies

Thirteen copies of the proposal must be submitted in a sealed envelope marked with the proposer's name and address and the following statement:

"RFP -- DO NOT OPEN UNTIL 4:45 P.M. JANUARY 28, 1987."

One unbound, reproducible copy shall be clearly marked "MASTER".

5. Small Business Preference

If the proposer is claiming the Small Business Preference, he or she must clearly state in the Cover Letter required in subparagraph V.B.3., above, that he or she is claiming the preference.

6. Length

The proposal shall be limited to twenty-five (25) typewritten pages, excluding resumes and references.

VI. Evaluation

A. Failure to Fulfill Minimum Proposal Requirements

All proposals will be reviewed by staff to determine if the Minimum Proposal Requirements contained in Section V., above, have been met. Failure to meet the Minimum Proposal Requirements will be grounds for rejection without further consideration. The State may reject any proposal if it is conditional, incomplete or contains irregularities. The State may waive an immaterial deviation in a proposal. The State's waiver of an immaterial defect shall in no way modify the RFP documents or excuse the proposer from full compliance with the contract requirements if the proposer is awarded the contract. Failure to clearly state in the Cover Letter that the proposer is claiming the Small Business Preference will result in the Proposer not being given the preference.

B. Selection Process

1. Evaluation Committee

Each proposal which meets the Minimum Proposal Requirements enumerated in Section V.A. and B., above, will be evaluated, scored and ranked by a Evaluation Committee. This committee may be composed of either staff, or Board members, or staff and Board members or the Board, sitting as a Committee of the Whole. The Evaluation Committee will score each proposal using the Proposal Rating Sheet attached as Attachment B. This rating sheet was specifically designed to judge the suitability of prospective contractors and their proposals.

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The scores of the Evaluation Committee will be combined and averaged. The proposal receiving the highest averaged score from the Evaluation Committee will be recommended to the Board for selection as the Proposed contractor.

If the Board sits as a Committee of the Whole, this part of the Selection Process will be combined with "Board Action," paragraph VI., B., 3, below.

2. Interview for Clarification

Proposers who meet the Minimum Proposal Requirements set forth in Section V., above, may be asked to present themselves for an interview with staff or Board members to clarify their proposals. This interview may occur at any time during the evaluation process. The purpose of this interview will be for clarification only; no proposer will be allowed to alter his or her proposal or add new information. Any attempt on the part of the proposer to do so will result in the disqualification of that proposer.

3. Board Action

The Board, at its next available regular meeting, will then vote to accept or reject the Evaluations, Scores, and Rankings of the Evaluation Committee and select the proposed contractor. In either case, the Board, by a majority of those present will adopt one series of Evaluations, Scores, and Rankings for the proposals in order to select the proposer receiving the highest score.

a. The Board may adopt, as its own, the Evaluations, Scores, and Rankings of the Evaluation Committee.

b. If the Board does not accept the recommendation of the Evaluation Committee it may adopt its own Evaluations, Scores, and Rankings of the proposers. Such Evaluations, Scores, and Rankings may include the adoption for some proposals of the same total scores as those given by the Evaluation Committee. Such Evaluations, Scores, and Rankings may also include the adoption for some proposals of scores which differ from those recommended by the Evaluation Committee.

4. Notice of Award

Notice of the proposed contract award will be posted in the Board's Sacramento offices for five business days, beginning the day following the March, 1987 Board

meeting. The award will be deemed final and the contract will be executed on or after the sixth business date after the above date.

5. Confidential Information

Prior to award of the contract, all proposals will be designated "confidential" to the extent permitted by the California Public Records Act (Government Code Section 6250 et seq.). After award of the contract, copies of all responses and evaluations will be regarded as public records and will be available for review by the public at the Board's offices. Any proposal which contains language purporting to render all or part of the proposal confidential shall be regarded as non-responsive to the RFP, and the proposal will be rejected.

C. Evaluation Criteria

All proposals meeting the Minimum Proposal Requirements will be evaluated, scored, and ranked in accordance with the procedures and methods described in Section VI B, using the criteria listed below and incorporated in the Proposal Rating Sheet (see Attachment B).

1. Content

The prospective contractor shall address in writing the following items:

a. Management

The prospective contractor shall designate by name the project manager to be employed. The project manager must have a minimum of five (5) years experience with projects of similar nature and complexity. The experience of the project manager must be discussed in writing in the proposal. The selected contractor shall not substitute the project manager without prior approval of the Board.

b. Personnel

The prospective contractor shall describe the qualification of all professional personnel to be employed, including a summary of similar work performed, a resume for each professional, a statement indicating how many hours each professional will be assigned to the project, and what tasks each professional will perform. The contractor shall not cause members of the project team to be substituted without prior approval of the Board.

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c. References

The prospective contractor shall provide names, addresses, and telephone numbers for three clients for whom the prospective contractor has performed technical and management assignments of similar complexity to that proposed in this request. A summary statement for each assignment shall be provided. The references may be interviewed regarding the effectiveness of the proposer's personnel and ability to complete projects on time. Negative responses from references may be cause for rejection of the proposal.

d. Subcontracts

If any subcontractors are to be used, the prospective contractor must submit a description of each person or firm, the work to be done by each subcontractor, the cost of the work, and a sample of similar work completed by the proposed subcontractor. All subcontracts must be approved by the Board, and no work may be subcontracted without the prior approval of the Board. In addition, the prospective contractor must indicate the cost of any subcontracts and any markup that the prospective contractor plans to take on subcontracts.

e. Conflict of Interest

The prospective contractor shall disclose any present or prior financial, business, or other relationship with the California Waste Management Board that may have an impact upon the outcome of the project. The prospective contractor shall also list current clients subject to any discretionary action by the Board, or who may have a financial interest in the policies and programs of the Board.

f. Existing Facilities to be Researched

The prospective contractor shall identify existing facilities that will be researched to provide a basis for recommended design, construction and operation guidelines proposed in the manual. Pertinent information such as the facility name, location, and access to the required information from the owner/operators of these facilities will be included.

2. Qualifications

The prospective contractor's qualifications for the Board's project will be evaluated, based on the individual qualifications and experience of the project manager, the project team and any proposed subcontractors.

3. Past Work

The prospective contractor's past work record will be reviewed to determine the success of past projects and any related work record.

4. Time and Cost

The prospective contractor's capability to successfully complete the Board's project will be evaluated based on the proposed work schedule and budget detail. The prospective contractor shall cost detail all items that will be charged to the Board, including travel charges that will be involved in the project and included in the bid amount. Costs must be segregated to show actual salary costs including hours, rates, and classifications, and administrative and overhead expenses. The required cost proposal format, attached as Attachment C, must be used.

5. Small Business Preference

The Small Business Preference shall consist of five percent (5%) of the score of the cost component of the highest scored proposal submitted by another bidder who is not certified as a small business. (included as part of Item VI.C.4, above).

6. Schedule of Tasks

The proposal shall contain a detailed schedule identifying major tasks to be undertaken to conduct the work, and the sequence and timeframe for each task. The schedule shall specify the estimated hours to accomplish each task.

VII. Schedule for Evaluation of Proposals and Award of Contract

Dec. 16, 1986	Mail out RFP
Jan. 28, 1987	Proposals must be received by 4:45 P.M. Proposals will be opened and evaluation will begin.
March 1987 Board Meeting	The Board makes its final selection and posts proposed contract award.
Sixth business day from above date	Final contract awarded.

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VIII. Limitations

1. Amendments

The State reserves the right to amend the RFP by addendum prior to the final date of proposal submission.

2. Information

All information obtained or produced during the course of work shall be made available to the Board for its use as it may so determine.

3. Commitment

The RFP does not commit the State of California or any of its agencies, departments or divisions to award a contract, to pay any costs incurred in preparation of a proposal responding to this RFP, or to procure or contract for services or supplies.

The Board reserves the right to accept or reject any or all proposals received as a result of this RFP, to negotiate with any qualified source, or to cancel in part or in its entirety this RFP, if it is in the best interests of the State of California to do so. The Board may require the proposer selected to participate in negotiations, and to submit such price, technical, or other revisions of their proposal as may result from negotiations.

If the selected proposer fails to negotiate a satisfactory contract with the Board within a reasonable time after the award, the Board may offer to negotiate with the next runner-up, without further advertising, issuance of another RFP, or evaluation of proposers. The Chief Executive Officer shall determine when negotiations have broken down with the first selected proposer, and whether to offer to negotiate with the next runner-up.

This procedure shall apply to negotiations with lower-ranked runners-up in order of original ranking, if negotiations cannot be successfully completed with any proposer.

4. Termination

The Board has the authority and express right to terminate any contract awarded to the contractor/s pursuant to the RFP at any time during the term of the contract for any reason or if the Board finds that the contractor's work is negligent, not satisfactory, or not in accordance with the agreed upon work program. In the event of termination the contractor shall be entitled to payment for approved costs incurred prior to the effective date of termination.

IX. Contract Terms and Conditions

1. State Contract Terms

   Attached [as Attachment A] is a copy of the major contract terms included in contracts executed by the State of California and this agency.

2. Start of Work

   Once the final contract award is made, work shall not begin until the contract is approved by the Department of General Services.

3. Reporting Requirements

   a. Progress Reports

      Written progress reports shall be submitted monthly, summarizing progress achieved during the preceding month and planned activities for the current month. Progress reports shall be submitted by the fifth working day of the month.

   b. Final Report

      A draft of the guidelines manual shall be prepared and submitted to the Board for approval prior to finalizing. The contractor may also be requested to make an oral report to the Board summarizing the information contained in the manual.

4. Contractor Evaluation

   Within thirty (30) days after completion of work under this agreement the contractor's performance shall be evaluated by the Board and a report filed with the Department of General Services.

5. Payment

   Contractor payments will be made in arrears not more frequently than monthly.

   An amount equal to ten (10) percent of each invoice shall be withheld, pending completion of all work to the satisfaction of the State.

   Contractor should anticipate waiting up to ninety (90) days for payment after submittal of each invoice.

Landfill Guideline

Proposal Rating Sheet

1. **Content** (Maximum 35 Points)

   Information on management, personnel references, subcontractors, conflict of interest, and existing facilities to be researched as required by Section VI C.1 of the RFP. Subtotal (35) _____

2. **Qualifications** (Maximum 25 Points)

   A. Project Manager. (15) _____

   B. Project Team and/or Subcontractors (10) _____

   Subtotal (25) _____

3. **Past Work** (Maximum 80 Points)

   A. Related work record. (40) _____
   (How much work has the proposer done in this area? Years of experience Number of jobs, recent work?)

   B. Quality of work. (20) _____
   (Do the exhibits illustrate a high quality of work both in developing specifications and producing reports?)

   C. Cost of production. (10) _____
   (Do the exhibits demonstrate the proposer's ability to produce the desired materials within a reasonable budget and time frame?)

   D. Favorable references. (10) _____
   (Do the references report the proposer completes projects effectively and on time?)

   Subtotal (80) _____

4. **Time and Cost** (Maximum 50 Points)

   A. Detailed Work Schedule. (10) _____
   (Does the schedule clearly specify the required tasks? Is the schedule reasonable, considering the staff available?)

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B. Cost. (40) _____
(Does the proposed budget detail indicate sufficient resources to complete the proposed project?)

Subtotal (50) _____

5. **Small Business Preference** (Maximum 2.0 points)
(If the proposer qualifies, he or she will be awarded 5% of the highest number of points awarded in the Cost component to another bidder who is not certified as a small business, Item 4.B., above.

Subtotal (2.0) _____

6. **Schedule of Tasks** (Maximum 10)

Does the schedule provide sufficient detail to allow ready monitoring of the contract?

Subtotal (10) _____

TOTAL POINTS (202) _____

(Includes small business preference)

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CALIFORNIA WASTE MANAGEMENT BOARD

Resolution 87-15

Adopting Ratings and Rankings of Proposals for Preparing Guidelines for the Design, Construction, and Operation of Leachate and Gas Monitoring and Control Systems

WHEREAS, on December 16, 1987 the California Waste Management Board issued a Request for Proposal (RFP) for preparing guidelines for the design, construction and operation of leachate and gas monitoring and control systems; and

WHEREAS, seven proposals were received by the 4:45 p.m. January 28, 1987 deadline established for submittal of proposals; and

WHEREAS, the Board's staff evaluation committee has reviewed the proposals in accordance with procedures and criteria established in the RFP; and

WHEREAS, the Board has considered the ratings and rankings established by the staff evaluation committee;

NOW, THEREFORE BE IT RESOLVED that the Board adopts the following ratings and rankings of proposals submitted in response to the RFP for the preparation of guidelines for the design, construction and operation of leachate and gas monitoring and control systems:

RANK	PROPOSER	RATING
1	SCS Engineering	191
2	Emcon Associates	190
3	CH2M Hill	188
4	Lockman & Associates	177
5	Environmental Science & Engineering	176
6	Converse Environmental Consultants, California	166
7	Ederra, Inc.	160

BE IT FURTHER RESOLVED that the Board authorizes the Chief Executive Officer to negotiate an agreement with SCS Engineering in an amount not to exceed $50,000.

CERTIFICATION

The undersigned Chief Executive Officer of the California Waste Management Board does hereby certify that the foregoing is a full, true and correct copy of a resolution duly and regularly adopted at a meeting of the California Waste Management Board held March 26-27, 1987.

Dated:

George T. Eowan
Chief Executive Officer

California Waste Management Board

Agenda Item #13

March 26-27, 1987

Item:

Update: California Curbside Recycling Program Study.

Key Issues:

- Natural resource conservation is purpose of curbside recycling.
- Staff's evaluation will determine what works, what doesn't, and why in achieving curbside recycling's purpose.
- Study to be based on case studies of 28 curbside recycling programs in operation in California.
- Staff has recently completed the study's data collection phase.
- Only verifiable, accurate and complete data will be used in the study.
- Data deficiencies severely constrain the evaluation.
- Staff expect to have a draft report for consideration at May Board meeting.

Background:

At its July 10-11, 1986, meeting, the California Waste Management Board directed staff to prepare a detailed, full-scale report evaluating the effectiveness of curbside recycling in California. Since 1978, the Board has allocated over $8 million in grant monies to encourage community recycling programs. In recent years, the Board has focused on curbside recycling in order to reduce as much as possible the amount of recyclable material going to landfills. The Board can use information from a curbside recycling evaluation to determine how worthwhile these public expenditures have been.

Basis for Study:

As designed by staff, the evaluation is based on the notion that conservation of natural resources is the purpose of curbside recycling. The Nejedly-Z'berg-Dills Solid Waste Management and Resource Recovery Act of 1972 notes that "the traditional methods of solid waste management in this state directed largely to land disposal may not meet future requirements for...conserving natural resources." The Act goes on to state that "methods of solid waste management

emphasizing source reduction, recovery, conversion, and recycling of all solid wastes are essential to the long-range preservation of the health, safety, and well-being of the public, to the economic productivity and environmental quality of the state, and to the conservation of the state's remaining natural resources." The Act, therefore, finds that it is in the public interest for the State "to establish and maintain a comprehensive solid waste management policy" which has as its objective "to provide for the maximum reutilization and conversion to other uses the resources" contained in the solid waste stream.* Maximal reuse of recyclable solid waste is expected to result in less use of natural resources as raw material, less usage of energy in manufacturing, and longer life expectancy for our landfills.

Study Scope

The study will determine what works, what doesn't, and why in curbside recycling. Staff will evaluate the effectiveness of curbside recycling, as a strategy for resource conservation, rather than the effectiveness of individual curbside recycling programs. The strategy's effectiveness will be judged according to how well natural resource conservation has been promoted in terms of accomplishment of two objectives:

- To recover recyclable materials from households thereby increasing the supply of these materials and conserving raw materials in the manufacture of paper products, aluminum cans, glass items, etc.

- To make it easier for Californians to participate in recycling as measured by curbside recycling participation rate. (Participation rate is the percentage of the population which recycles at least some wastes.)

The study will not address possible effects of the "Bottle Bill" (AB2020) on the viability of curbside recycling since the study's data collection will be completed before the Bottle Bill begins operation.

Study Method

Staff is basing the evaluation on individual case studies that provide data on each program's effectiveness. Staff will perform a comparative analysis of the various curbside recycling programs and identify the factors which account for differences in program effectiveness. The study will examine the differences in curbside recycling program effectiveness in terms of--

- material recovery rate in pounds of recyclable material collected per participating household, by type of material (e.g.,

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* Citations found in Government Code Sections 66701 (c) and (d) and 6670[illegible].

newspaper, glass, nonferrous metals) as a percentage of the total potentially recoverable. (In 1980, the Board defined a 20 percent rate as being average for a well-developed collection program.)

- household participation rate as a percentage of opportunities provided for households to set out recyclable materials
- diversion rate as a percentage of the total municipal waste stream removed from landfill disposal through curbside recycling
- cost per household per month
- cost per ton diverted from the landfill waste stream
- net reduction, if any, in community solid waste management costs attributable to curbside recycling
- benefit-cost ratio.

The evaluation will examine the influence on curbside recycling programs of such factors as--

- markets
- level of source separation required of participating households
- level of integration with other recycling activities (e.g., buy-back services, dropoff, and composting)
- cost to program participants
- collection schedule
- type of operating agreement (e.g., franchise with city)
- population density of program service area
- degree of subsidy
- program economics
- start-up costs
- equipment selection and assessment
- labor needs
- management methods
- mode of operation
- type of entity funded (municipality and profit or nonprofit organization)
- geographic location
- public awareness activities.

The product of the data analysis will be answers to major questions regarding curbside recycling.

1. Background questions to bring out information on how curbside recycling is organized, its history, and what curbside recycling is intended to accomplish.

2. Cost effectiveness questions to measure the extent to which recycling objectives are met by curbside recycling. For example:

a. To what extent are recyclable materials recovered from the waste stream as a result of curbside recycling?

b. To what extent do households participate in curbside recycling?

c. To what extent does curbside recycling achieve resource conservation in terms of--

- increasing the supply of recycled waste materials?
- decreasing energy usage in manufacturing?
- increasing the life expectancy of landfills?

d. To what extent is curbside recycling a cost-effective way to meet recycling objectives? In terms of cost per ton of waste handled, how do curbside recycling costs compare with the costs of collecting and disposing of household solid wastes in landfills? What benefits does the difference in disposal costs pay for (i.e., landfill vs. curbside recycling disposal)?

3. Cost-benefit questions to examine how well the program is working in terms of dollar return on social investment dollar. For example:

   a. What direct and indirect benefits does curbside recycling produce?

   b. Under what circumstances do curbside recycling programs recoup costs? (I.e., benefit:cost ratio equals or exceeds 1:1.)

   c. How well does the average monthly per household cost for curbside recycling correspond to the surcharges levied to pay for curbside recycling programs?

4. Cost-efficiency questions to determine what aspects of curbside recycling operations result in the least expensive way to accomplish program objectives. For example, the study will analyze what causes the differences observed in the cost per ton of material recycled by various curbside recycling programs to find out which factors produce the most cost efficient operations (i.e., which factors result in the lowest cost per ton of recycled material collected).

5. Constraint questions to highlight the factors which hamper curbside recycling success and to discover possible improvements to curbside recycling programs.

6. Replication potential questions to find out if there are aspects of some curbside recycling operations which can be applied more widely.

Study Status

Board staff has recently completed the study's data collection phase. In late September, 1986, two Board staff were assigned to work on this evaluation. Each has other duties in addition to this evaluation. During October, staff designed the study along the lines discussed above. Since early November, staff has been reviewing curbside recycling program documents and interviewing program operators. As of March 6, 1987, staff have collected data on 24 of the 29 curbside recycling programs in operation during the period October, 1985, through September, 1986. These programs are located in 49 communities, as shown on Attachment A.

Staff has also begun to assess the data collected thus far and to make sense of the data. Attachment B provides summary statistics for programs whose data have been confirmed as accurate and complete. Attachment C contains examples of summary descriptions of a few of the programs.

The study has gone slowly because of staff's commitment to use only data which we can verify as being accurate and complete. Making the adjustments necessary to account for variation in programs' data definitions and collection methods and for differences in innate recycling potential has taken longer than was originally expected.

Data collection has been more complicated than expected because the data are not always readily available. For example, a city may have a private contractor providing the curbside recycling service, have another operator providing garbage collection, and have the Department of Public Works providing the landfill operation. Furthermore, entirely separate departments may be responsible for keeping the data we need on the amounts of materials recovered and program finances. In such cases, collecting cost and quantity data means each of these agencies separately. Our task has been made more difficult when the various entities keep their records in formats which do not allow ready conversion to community-wide statistics. Finally, we have a contractual right to obtain records only from the agencies to which we have made curbside recycling grants. We have had no guarantee that all the other agencies involved-- public and private-- will allow us full access to the data needed to do the study as designed.

Constraints

Staff has found that data deficiencies severely constrain the study. However, staff is making every attempt to overcome these deficiencies through standardization so that "quality data" are used to evaluate curbside recycling. The most serious deficiencies are--

- Some communities have dropoff and buyback as well as curbside recycling services. They do not always separate the data on curbside recycling from data on their other recycling programs. For example, the accounting systems in those communities may not differentiate costs among the various recycling services offered.

- Some communities provide curbside recycling to commercial establishments as well as to households. As a result, staff sometimes cannot distinguish between the recyclable materials recovered from households and the materials recovered from other sources. Staff may have to rely on the operator's "educated guesses" if we are to include those programs in our study.

- Not all programs have kept records from which we can calculate such measurements of program effectiveness as material recovery rate. If there were no studies of how much recoverable materials were going to landfill disposal in the absence of the program, it is difficult to determine what percentage of the recoverable material is being recycled as a result of the curbside program. We may have to use noncommunity-specific waste composition studies in order to include such communities in our study.

- The programs vary in the definition of terms used in keeping statistics. For example, the definition of what constitutes a "household" varies widely. Adjustments are being made to the extent possible to ensure that all statistics reported in the evaluation have the same definitional basis.

- The various communities have differing periods of service. Some began service in the 1970s whereas others did not begin their programs until relatively recently. Such programs are still overcoming start-up problems which others solved years ago. This situation will make for unequal comparisons of programs.

Prognosis:

Staff expects to complete data data analysis by the first week in April, 1987. A draft report should be ready for consideration at the May Board meeting.

Recommendation:

Information item.

BROW/recy:crag387

Attachment A

LOCATION OF CURBSIDE RECYCLING PROGRAMS IN CALIFORNIA

Alameda County
- Berkeley
- Livermore

Contra Costa County
- El Cerrito

Fresno County
- Fresno/Clovis
- Kingsburg
- Reedley
- Sanger
- San Joaquin

Kings County
- Hanford

Los Angeles County
- Burbank
- Claremont
- Redondo Beach
- Santa Monica
- West Los Angeles

Marin County
- Belvedere
- Greenbrae
- Kentfield
- Larkspur
- Lucas Valley
- Mill Valley
- Ross
- San Rafael
- Sausalito
- Tan Valley
- Terra Linda
- Tiburon

Monterey County
- Carmel/Pebble Beach

Sacramento County

San Diego County
- Oceanside
- Solana Beach/Encinitas/Cardiff

San Luis Obispo
- San Luis Obispo

San Mateo County
- Menlo Park/Atherton

Santa Clara County
- Los Altos
- Palo Alto
- San Jose
- Sunnyvale

Sonoma County
- Healdsburg/Windsor
- Novato
- Santa Rosa

Stanislaus County
- Modesto
- Turlock

Tulare County
- Visalia

Yolo County
- Davis

BROW/recy:crag387

Attachment I

SUMMARY OF STATISTICS FOR SEVERAL CURBSIDE RECYCLING PROGRAMS

(Programs listed in order from highest per capita recovery rate)

PROGRAM	POP SERVED	# HOMES SERVED	COLL FREQ	MATERIALS COLLECTED Al/C/Fe/G/N/Oil/Wp/WB/PET*	PART RATE (%)	TPY	LB PER CAP	SURCHARGE ($/MO/HH)	PROFIT or COST ($/MO/HH)	PROFIT or COST ($/T)	AVOID FACTOR ($/T)	OP REV: OP COST RATIO
Davis	22,944	9,600	1/wk	X X X X X	65 %	3,010	262	$ 1.00	- $ 1.04	- $ 39.88	$ 5.50	0.50
Menlo Park/Atherton	36,146	14,400	2/mo	X X X X	30 %	1,581	220	$ 0.00	- $ 0.23	- $ 25.11	$15.25	0.55
Healdsburg/Windsor	4,440	2,100	1/wk	X X X	30 %	190	181	$ 0.00	- $ 0.15	- $ 19.69	$12.00	0.60
Los Altos	27,614	9,000	2/mo	X X X X X	30 %	2,042	148	$ 1.00	- $ 0.87	- $ 47.74	$21.06	0.43
Santa Monica	26,260	13,000	2/mo	X X X X	60 %	1,900	145	unknown	- $ 0.55	- $131.00	$ 4.26	0.17
Sunnyvale	69,020	28,000	1/wk	X X X X X X	21 %	4,169	121	unknown	- $ 0.80	- $ 64.32	$ 0.00	0.34
West Los Angeles	35,100	13,000	2/mo	X X X X	60 %	2,118	121	$ 0.00	- $ 0.89	- $ 65.66	$33.39	0.26
Novato	22,610	8,500	1/wk	X X X	60 %	1,297	115	$ 0.00	+ $ 0.05	+ $ 3.56	$ 8.65	1.12
Santa Rosa	78,700	32,800	1/wk	X X X	55 %	4,222	107	$ 0.00	- $ 0.12	- $ 11.11	$12.00	0.77
San Luis Obispo	19,186	8,021	1/wk	X X X	40 %	754	79	$ 0.00	- $ 0.08	- $ 10.20	$ 5.45	0.81
Redondo Beach	27,480	11,794	1/wk	X X X X	15 %	899	65	$ 0.00	- $ 0.36	- $ 56.35	unknown	0.53
Solana Beach	11,438	4,300	2/mo	X X X	25 %	367	64	$ 0.00	- $ 0.30	- $ 42.67	$ 3.28	0.37
Berkeley	96,203	45,246	1/mo	X X X X X	15 %	2,260	47	$ 0.00	- $ 0.01	- $ 19.59	$25.25	0.70
Carmel/Pebble Beach	11,186	6,000	2/mo	X X X	30 %	228	41	$ 0.00	- $ 0.27	- $ 84.08	$ 3.50	0.23
Oceanside	67,555	25,589	1/wk	X X X	12 %	1,306	39	$ 0.00	- $ 0.22	- $ 50.74	$ 6.00	0.38
Hanford	24,861	8,500	1/wk	X X X	12 %	294	24	$ 0.00	- $ 0.28	- $ 98.16	$10.62	0.23
Fresno/Clovis	247,366	96,214	1/mo	X X X X	4 %	1,380	11	$ 0.00	- $ 0.01	- $ 6.53	$ 8.50	0.90

* Al = aluminum; C = cardboard; Fe = ferrous metals and tin; G = glass; N = newspaper; Oil = used motor oil; Wp = white paper; Wb = wine bottles

Attachment C

CURBSIDE RECYCLING PROGRAM DESCRIPTIONS

BERKELEY

Berkeley Ecology Center, a nonprofit organization, provides monthly curbside collection of aluminum, glass, newspaper, tin, and wine bottles from all residences in the City of Berkeley, including multi-family units. Residents may use their own containers for recycling or box-waxed corrugated containers sold to them ($1.50 each) by the program. Residents are asked not to use paper or plastic bags. Collection is made with three curbside collection trucks specially designed to allow its bins to be lowered to the ground. Each truck has a crew of two part-time employees.

Much of the processing (sorting) of materials is done at the time of collection as the drivers separate wine bottles from glass, tin cans from aluminum cans, and contaminants from newspaper. After collection, only wine bottles are further processed before sale.

After being sorted by type at the curbside recycling program/drop-off center yard, wine bottles are sold to ENCORE in Richmond. Aluminum and newspaper are sold to an adjacent buy-back center. Tin collected by the program is stored with tin collected through drop-off boxes and sold to a buyer in Lathrop. Revenues from the sale of tin ($6.50 per ton net after hauling) are split with the drop-off program. The curbside recycling program sells its glass directly to a glass manufacturer in Oakland.

Berkeley has a population of 96,203 living in the 45,246 households served by the program. Berkeley's solid waste generation equals 107,300 TPY (residential, commercial, and industrial). Of this amount, 14,195 TPY (13 percent) is aluminum, glass, newspaper, and tin. Residents pay $7.20 to $8.50 per month for residential can garbage collection service. Landfill disposal of Berkeley's solid waste costs $90 to $100 per ton of which $25.25 per ton can be avoided through recycling ($8.25 per ton is tipping fee, $11.50 per ton is for transportation, and $5.50 per ton are transfer station fees).

The Berkeley program recovered 2260 tons (16 percent) of recyclable material in 1985-86. Participation is estimated to be 15 percent when participation by households in multi-family units is accounted for.

The program had a net cost of $44,241 in 1986: $101,994 in revenues less $146,235 operating cost. The City of Berkeley subsidizes the program on the basis of a sliding scale, paying more when newspaper prices are low. The subsidy is justified as paying Berkeley Ecology Center a share of the avoided cost realized because the program diverts solid waste from landfilling. At $25.25 per ton, the avoided cost on 2260 tons recycled is $57,065 savings realized by the City of Berkeley.

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CARMEL/PEBBLE BEACH

The John Roscelli Corporation and the Carmel Valley Disposal Service, under a single ownership, operate the curbside recycling program in Carmel (Roscelli) and Pebble Beach (Carmel Valley). The program collects aluminum, glass, and newspaper from single family homes in the two communities. The companies have the franchise for local garbage collection. The program is operated as a community service to the extent that the owner's wife drives the collection truck and makes the pickups. Curbside recycling pickups are made twice monthly, on the same day as garbage collection. Residents use their own containers for glass and aluminum and bundle their newspapers. The owner's wife uses a 3/4 ton pickup to make curbside collections.

There is no processing of the recycled materials prior to sale to the Monterey Peninsula Garbage and Refuse Disposal District, at the District's Marina Landfill.

The area served by the program has a population of 11,186 living in 6000 single family homes. The residents served by the program generate 13,608 TPY of residential solid waste. Of this amount, 5307 TPY (39 percent) is aluminum, glass, and newspaper. Billing for residential garbage service ranges from $5.40 to $8.10 per month. This pays for curbside recycling as well as garbage service although the bill does not assess a charge for curbside recycling separately. Disposal of solid waste costs $45 per ton for collection and disposal. Of this amount, $3.50 per ton is for tipping fees which can be avoided through recycling.

The curbside recycling program recovered 228 tons (4 percent) of recyclable material in 1985-86. The participation rate is calculated by the operators to be 30 percent.

The program appears to have had a net cost of $19,170 in 1986: $5830 in revenues less $25,000 operating cost incurred by the operator. The operator absorbs the deficit cost of the curbside recycling program. At $3.50 per ton for tipping fees, the avoided cost savings from the curbside recycling program is $448 which is realized by the program operators.

DAVIS

Davis Waste Removal Company, the private franchise garbage company in Davis, provides curbside collection of aluminum, cardboard, glass, newspaper, and tin to single-family to 4-plex residences and a few small apartment complexes in the City of Davis and adjacent El Macero and Willowbank and to businesses for the pickup of cardboard and newspaper. Curbside recycling pickups are on the same day as garbage collection, weekly for residences and sometimes every day for businesses. Residents use their own containers for recycling. Residents are expected to flatten cardboard boxes. They are not asked to separate aluminum and tin cans because mixed cans are seen as being

less susceptible to scavenging. Collection is made with a modified Lodal truck with hydraulically operated hopper bins. The truck is operated by one driver and one loader.

All materials except newspaper are processed to some degree prior to sale.

- Magnetic separation of cans, crushing and baling of aluminum cans
- Baling of cardboard
- Hand sorting to color separate glass, crushing of glass
- Storage of newspaper loose in bins until hauled to market.

Aluminum and newspaper are hauled by the Company to Sacramento for sale, and cardboard is sold to a broker which hauls it away. The curbside recycling program sells its glass directly to a glass manufacturer in Tracy. Tin collected by the program is landfilled because the price for tin is too low and the cost of transportation to market is too high.

The area served by the program has a population of 22,944 living in 9600 residential units. The 22,944 residents generate 19,680 TPY of solid waste (residential, commercial, and industrial, but not sewage sludge, construction, yard, or agricultural waste). Of this amount, 4726 TPY (24 percent) is aluminum, cardboard, glass, and newspaper. Residents pay $13 per month for garbage service, of which $1 per month is "earmarked" for operation of the curbside recycling program. Disposal of solid waste costs an estimated $28.45 per ton for collection and landfill disposal. Of this, $5.50 per ton is a tipping fee which can be avoided through recycling.

The Davis program recovered 3010 tons (64 percent) of recyclable material in 1985-86. Participation is estimated to be 65 percent of the eligible households participating at least once per month.

The program had a net cost of $120,050 in 1986: $119,950 in revenues less $240,000 operating cost. This loss is almost entirely offset by the $1 per household per month ($115,200 per year) allocated to the curbside recycling program from the garbage bill. (The Company does not consider this amount to be a "surcharge.") At $5.50 per ton tipping fee, the avoided cost on 3010 tons recycled is a $16,555 savings realized by the Davis Disposal Company.

FRESNO (MARS Program)

Rice Road Land Reclamation Company, a private recycling company, provides curbside collection of aluminum, cardboard, glass, and newspaper to all single-family homes in the City of Fresno and the City of Clovis. A few (54 per month average) businesses also avail themselves of this service. The Company operates the program under an exclusive agreement with the City of Fresno. (The City of Fresno ran the program until September, 1985, when the annual "loss" on the program was estimated to be $350,000.) The current program operator makes curbside recycling pickups monthly, on the same day each month. Residents use their own containers for recycling. Residents are

expected to separate the recyclables and to flatten cardboard boxes. Collection is made with four trucks with Midway trailers holding three bins each. Each truck is operated by a single driver.

There is no processing of the recycled materials prior to sale.

MARS program staff haul all materials except cardboard directly to market. Cardboard is sold onsite to the Rice Road Dump, Transfer Station, and Recycling Center (whose president owns the MARS curbside recycling program operation). Aluminum is sold to a recycler in Fresno, glass is sold to a glass company in Madera, and newspaper is sold to nonprofit organization in Fresno which makes insulation from shredded newspaper.

The area served by the MARS program has a population of 247,366 living in 96,214 single family homes. Most of the residents using the service live in the City of Fresno. Residents of Fresno pay $8.65 per month for garbage service. The 247,366 residents generate 139,947 TPY of residential solid waste. Of this amount, 33,727 TPY (24 percent) is aluminum, cardboard, glass, and newspaper. Disposal of solid waste costs an estimated $19.85 per ton for collection and landfill disposal. An estimated $8.50 per ton of this cost is for tipping fees which can be avoided through recycling.

On an annualized basis (considering that there were only ten months' data available at data collection) the MARS program recovered 1380 tons (12 percent) of recyclable material in 1985-86. Participation is estimated to be 4 percent of the eligible households participating at least once per month.

On an annualized basis, the MARS program had a net profit of $12,822 in 1986: $83,602 in revenues less $70,780 operating cost. However, this profit occurred only because the program was able to hire Jobs Training Partnership Act work experience trainees at half wages, the other half (worth approx. $21,840) being picked up by JTPA. If the balance sheet is adjusted to account for this "subsidy," the net profit would become a net cost of $9018 for 1986. With the tipping fee at $8.50 per ton, the 1380 tons diverted from landfilling gives the City of Fresno an avoided cost savings of $11,730.

HANFORD

The City of Hanford provides curbside collection of aluminum, glass, and newspaper to all residences and businesses in the City of Hanford and unincorporated "islands" within the city limits. Curbside recycling pickups are made weekly, on the same day as garbage collection. Residents use their own containers or the 20 gallon garbage cans or the large brown paper bags provided by the City for recycling. Residents are expected to separate the recyclables. Collection is made with a 3/4 ton pickup truck pulling a fifth-wheel trailer with various bins. The truck is driven by a city employee.

There is no processing of the recycled materials prior to sale.

All materials are hauled directly to market by the curbside collection truck. Aluminum is sold to a scrap metal buyer in Hanford, and glass ($18.34 per ton) and newspaper ($24 per ton) are sold to Kings Rehabilitation Center located next to the City's corporation yard.

The area served by the program has a population of 24,861 living in 8500 homes. There are 1200 businesses. The residents and businesses of Hanford generate 21,629 TPY of solid waste (residential, commercial, and industrial, but not sludge or construction, yard, or agricultural wastes). Of this amount, 4542 TPY (21 percent) is aluminum, glass, and newspaper. The average billing for garbage service (residential and commercial) is $11.57 per month. Disposal of solid waste costs an $76.64 per ton of which an average of $10.62 per ton is for tipping fees which can be avoided through recycling. (Deficit costs for the curbside recycling program are included in the $76.64 per ton figure.)

The curbside recycling program recovered 294 tons (6 percent) of recyclable material in 1985-86. This amount does not include the estimated 200 TPY which the curbside recycling truck collects from newspaper dropoff bins. Participation is estimated to be 12 percent of the eligible households participating (according to a tally kept during one week in September, 1986.

The program had a net cost of $28,859 in 1986: $8429 in revenues less $37,288 operating cost. The operating cost includes 30 percent for city overhead. The City makes up the deficit between revenues and operating costs. At $10.62 per ton for tipping fees, the avoided cost savings from the curbside recycling program is $3122 to the City of Hanford.

HEALDSBURG/WINDSOR

Empire Disposal Co., a subsidiary of Waste Management, Inc., provides curbside collection of aluminum, glass, tin, and newspaper to single family homes in the City of Healdsburg and in the unincorporated area of Windsor. Curbside recycling pickups are made weekly, on the same day as garbage collection. Residents use their own containers. Residents are expected to separate the recyclables. Collection is made with a modified Lodal curbside collection vehicle. Collection is handled by the collection truck driver.

Processing of the recycled materials is done at Empire Disposal's central processing facility in Santa Rosa. Processing involves--

- Magnetic separation of cans, crushing and baling of aluminum cans
- Unloading of the glass into bins supplied by the buyer
- Baling of newspaper and loading the bales onto flatbed trucks supplied by the buyers.

Recyclable materials are collected by buyers on a "on-call" basis and taken to final markets. Empire Disposal does not haul materials to market.

BROW/recy:crag387

The area served by the program has a population of 4440 living in 2100 single family homes. The residents served by the program generate 4307 TPY of combined residential-commercial solid waste. Of this amount, 991 TPY (23 percent) is aluminum, glass, and newspaper. The average monthly billing for residential garbage service is unknown. Collection and disposal of solid waste costs an average of $45 per ton of which $12 per ton is for tipping fees which can be avoided through recycling.

The curbside recycling program recovered 190 tons (19 percent) of recyclable material in 1986. This amount is only an estimate since the Company only maintains tonnage totals for materials sold by the entire processing center. The 190 ton figure is calculated from the volumes of wastes brought to the processing center by the curbside recycling truck. The participation rate is estimated to be 30 percent.

Since program costs and revenues are absorbed into overall processing center operation, the cost of the program can only be estimated. The program appears to have had a net cost of $3,741 in 1986: $5,514 in revenues less $9,255 operating cost. Empire Disposal absorbs the deficit cost of operating the curbside recycling program. At $12 per ton for tipping fees, the avoided cost savings from the curbside recycling program is $2,280 which is realized by Empire Disposal.

LOS ALTOS

Los Altos Garbage Company, the private franchise garbage company in Los Altos, and the City of Los Altos provide curbside collection of aluminum, glass, newspaper, oil, and tin to all residences in Los Altos, including apartment and condominium complexes. Curbside recycling pickups are made twice monthly. It is not felt to be necessary for the pickup to on the same day as garbage collection since residents receive backyard garbage service.

Both the Garbage Company and the City make pickups: the company does the bulk of the collection and the City sends out a truck to pick-up newspaper in those area known to produce high volumes of newspaper. Residents use sisal bags provided by the City for recycling cans and bottles and bundle newspaper or put it in shopping bags. Residents are encouraged to put out materials only when their curbside recycling bags are full. Residents are expected rinse and remove labels from bottles and to put bottles in one bag and cans in another. They are not asked to separate aluminum and tin cans because the City wants curbside recycling to be as convenient as possible. The Garbage Company uses a city-owned 2 ton , fifth wheel van and Midway trailer for pickups. The City uses a dump truck for its special newspaper pickups. Each truck has a driver who makes all pickups.

The Los Altos curbside recycling program does no processing for itself. Rather, all materials except the newspaper from the special collection are delivered to Sunnyvale Recycling Center for processing and sale. The Center charges a fee for this service which is deducted

from the revenues realized from material sales. Tin is given to the Center which in turn gives tin a Santa Clara company which sells tin to a company in Lathrop. The newspaper from the City's special collection is sold to a buyer in Santa Clara.

The area served by the program has a population of 27,614 living in 9000 "households," some of which are multi-family housing units. The 27,614 residents generate 15,200 TPY of residential solid waste. Of this amount, 4683 TPY (31 percent) is aluminum, ferrous metals, glass, and newspaper. Residents pay $9.60 per month for garbage service, of which $1.00 per month is collected to pay for the curbside recycling program. Disposal of solid waste costs an estimated $55.08 per ton for collection and landfill disposal. Of this, $21.06 per ton is a tipping fee which can be avoided through recycling.

The Los Altos program recovered 2042 tons (44 percent) of aluminum, tin, glass, and newspaper and 4955 gallons of used oil in 1985-86. Tallies made in September, 1986, showed that 30 percent of the eligible households participate in the program.

The program had a net cost of $92,381 in 1986: $69,830 in revenues less $163,211 operating cost, including the fees paid to Sunnyvale for processing and marketing, costs to the City of Los Altos, and fees paid to the Garbage Company. This loss is offset by the almost $1 per household per month ($104,000 per year) surcharge for curbside recycling program on the residential garbage bill. At $21.06 per ton tipping fee, the avoided cost on 2025 tons recycled is a $42,646 savings realized by the City of Los Altos and the Garbage Company.

MENLO PARK/ATHERTON

The City of Menlo Park provides curbside collection of aluminum, cardboard, glass, and newspaper to all residences in both Menlo Park and Atherton, including apartment and condominium complexes. Curbside recycling pickups are made twice monthly. Pickup is not on the same day as garbage collection since residents receive backyard garbage service. Residents use their own containers, except that they are asked not to use plastic bags. Residents are asked to perform much of the processing before they put materials out at curbside: they remove contaminants, such as caps and neck rings, flatten aluminum cans, stack newspaper flat in tied bundles or in paper bags, and tie cardboard in bundles not exceeding two foot by two foot. If the driver observes contaminants (e.g., magazines with the newspaper or plastic or tin with the aluminum cans), the contaminants are left at curbside with a notice reminding the resident to follow the program's quality control procedures. The City uses a two ton flatbed truck and a fifth-wheel Midway trailer for pickups. A full-time City employee drives the truck and makes all pickups. He is assisted by his supervisor as needed to finish a route each day.

Processing is done by Youth Enterprises Recycling, a subsidiary of a nonprofit youth employment and training organization, which uses revenues from the program as a source of funding for its training programs. YER provides processing and marketing under subcontract

with the City of Menlo Park. Processing at the YER recycling center involves--

- Removal of ferrous cans, if any, from the aluminum cans by means of a magnetic separator, crushing of the aluminum cans, and storage in three to five cubic yard boxes which YER hauls to market
- Baling of cardboard
- Unloading of glass, unsorted and not crushed, into roll-off boxes for the buyer to pick-up
- Unloading of newspaper, loose, into roll-off boxes for the buyer to pick-up

YER hauls aluminum to market in San Jose and cardboard to market in Newark. Buyers transport the glass and newspaper to market.

The area served by the program has a population of 36,146 in 14,400 households (11,900 in Menlo Park and 2500 in Atherton). The 36,146 residents generate 15,106 TPY of residential solid waste. Of this amount, 3322 TPY (22 percent) is aluminum, cardboard, glass, and newspaper. Residents of Menlo Park pay $75 per year ($6.25 per month) as part of their tax bill for garbage service, and Atherton residents pay $6 per month. Curbside recycling program funding is not included in these billings. Disposal of solid waste costs an estimated $73 per ton for collection and landfill disposal. Of this, $15.25 per ton is a tipping fee which can be avoided through recycling.

The program recovered 1581 tons (48 percent) of aluminum, cardboard, glass, and newspaper in 1985-86. The last annual count of pickups in October, 1985, showed 25 to 30 percent of the eligible households participate in the program.

The program had an estimated net cost of $39,705 ($33,705 to $45,705) in 1986: $50,295 in revenues less an estimated $90,000 ($84,000 to $96,000) operating cost. The operating cost includes approximately $36,000 per year in cost paid by YER for processing and marketing the materials. Revenues from the sale of the materials are split between YER and the City of Menlo Park. The City of Menlo Park gives the City of Atherton a share of the revenues proportional to that city's share of the program tonnages. The deficit to YER is offset by the value to the organization of having a City-owned site rent-free to use for the organization's recycling enterprise. The deficit to Menlo Park is offset by funds from the City's GENSTAR Project methane recovery account. Atherton offsets its deficit from City general funds. At $15.25 per ton tipping fee, the avoided cost on 1581 tons recycled is a $24,110 savings realized by the Cities of Menlo Park and Atherton.

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CALIFORNIA WASTE MANAGEMENT BOARD

Agenda Item #14

March 26-27, 1987

Item:

Video Presentation: Plastics Recycling Pilot Plant, Rutgers University.

Key Issues:

- Pilot plant can process PET and HDPE at an optimal level of quality and recovery rate.
- A full-scale plant can give a DCF rate of return of 7 percent on a $3.3 million investment.

Background:

On January 13, 1987, Board Member John Gallagher and staff member Carole Brow attended a seminar at Rutgers University on the reclamation of polyethylene terephthalate (PET) and high density polyethylene (HDPE) plastic. These are the plastics used to make soda pop (PET) and milk (HDPE) bottles. Rutgers University's Center for Plastics Recycling Research is funded by the National Science Foundation and the states of New Jersey, Ohio, and Michigan, among others. The plastics industry cooperates in the research and was instrumental in establishment of the Center. The seminar concluded with a visit to the Center's pilot plastics recycling plant. Staff obtained a videotape of the operation of this pilot plant to present to the Board.

Discussion:

The Center has devised a process by which plastic soda pop and milk bottles (PET and HDPE) can be recycled at an optimal level of quality and recovery rate. The process is semiautomated (hand-feeding of bottles into the shredder and hand-packaging of the end-products) so that 600 pounds of feedstock can be reclaimed per hour (5 million pounds per year if operated 3 shifts per day, year round). Essentially all the PET, HDPE and aluminum present in the feedstock (the plastic bottles) is recovered. The Center's process produces 99.5 percent pure PET with concentrations of aluminum in the PET end product of 119 to 158 ppm. This level of quality satisfies those industry buyers of recycled PET who expect aluminum concentrations in recycled PET to be less than 0.5 percent. It does not suit molding buyers who want aluminum-PET separation to achieve less than 100 ppm aluminum to PET end product.

There are seven steps to the Center's plastics reclamation process. As shown on the videotape and on Attachment A, these steps are as follows:

1. PET and HDPE bottles are shredded to strips approximately one inch wide.

2. The shredded bottles are granulated to be flakes of metal, paper, and plastic approximately 0.25 inch wide or less. Choice of chip size is critical to optimizing the reclamation process. If the chips are too large, the chips will tend to cause blockages in the pumps and other equipment and time and money will be lost in maintaining the flow through the process. Material is lost from the chips as rough or "feather" edges are rubbed off during processing. If the chips are too small, there will be more length of edge and therefore more of the finely divided material to be lost into the process waste stream.

3. A flow of air separates out loose flakes of paper.

4. A non-caustic aqueous solution pulps any remaining paper and removes adhesive from plastic and metal chips. This solution is made with Lever Brothers "Exact," an industrial detergent essentially equivalent to "Cascade" dishwashing detergent. Spent washing solution is recycled back into the processing after the pulp-glue slurry is removed. (When the solution can no longer be recycled, suspended solids (fine plastic, paper, etc.) are removed and the liquid is neutralized with vinegar before discharging the solution as effluent to the sewage system.)

5. Passing the chips through a tank of water separates the HDPE chips which float from the PET and aluminum chips which sink.

6. The HDPE chips are air dried for packaging and the other chips are air dried for further processing.

7. The aluminum and PET chips pass through an electrostatic separator-centrifuge. In this step, a negative 38 kV (DC) charge is given to a spinning drum. Since dry aluminum conducts electricity, the aluminum chips don't stick to the drum and are thrown off as it spins. The dry PET chips stick to the drum and are brushed off into a collection hopper as the drum spins past the brush.

Figures provided by Center researchers show that doubling pilot plant capacity to 10 million pounds of feedstock processed per year should give a 7 percent discounted cash flow rate of return on investment. Installing a plant twice the size of the pilot plant would provide economies of scale on the pumps, etc. A return of 7 percent assumes an upscale plant processing 10 million pounds of PET bottles per year and achieving a 100 percent recovery rate. Such a plant would cost $3,300,000. The after tax return would be $312,000 annually under the

following set of assumptions:

	Content	Price per pound
Aluminum	1 %	$0.40
PET	75 %	0.28
HDPE	24 %	0.17

Blended price = $0.26

Gross revenue from 10 million pounds at $0.26/lb		$ 2,600,000
Cost of 10 million pounds feedstock at $0.10/lb		-1,000,000
Cost of operation:		
Labor cost	$ 524,000	
Management cost	94,000	
Equipment depreciation	78,000	
Utilities	30,000	
Operating supplies	66,000	
Packaging supplies	313,000	
	$1,105,000	-1,105,000
Net return before tax		$ 495,000
Taxes estimated at 37%		- 183,000
Net return after taxes		$ 312,000
Total investment		$ 3,300,000

$$\text{Ratio} = \frac{\$\ 312,000}{\$3,300,000} = 0.0945$$

From the Industrial DCF Curves for Ratio of 0.0945,
DCF rate of return = 7 percent per year

Note: the $3,300,000 investment includes the cost of land, building, equipment, and installation. The equipment is depreciated assuming 60 percent of the value is depreciated on a straight line basis over a 10 year period.

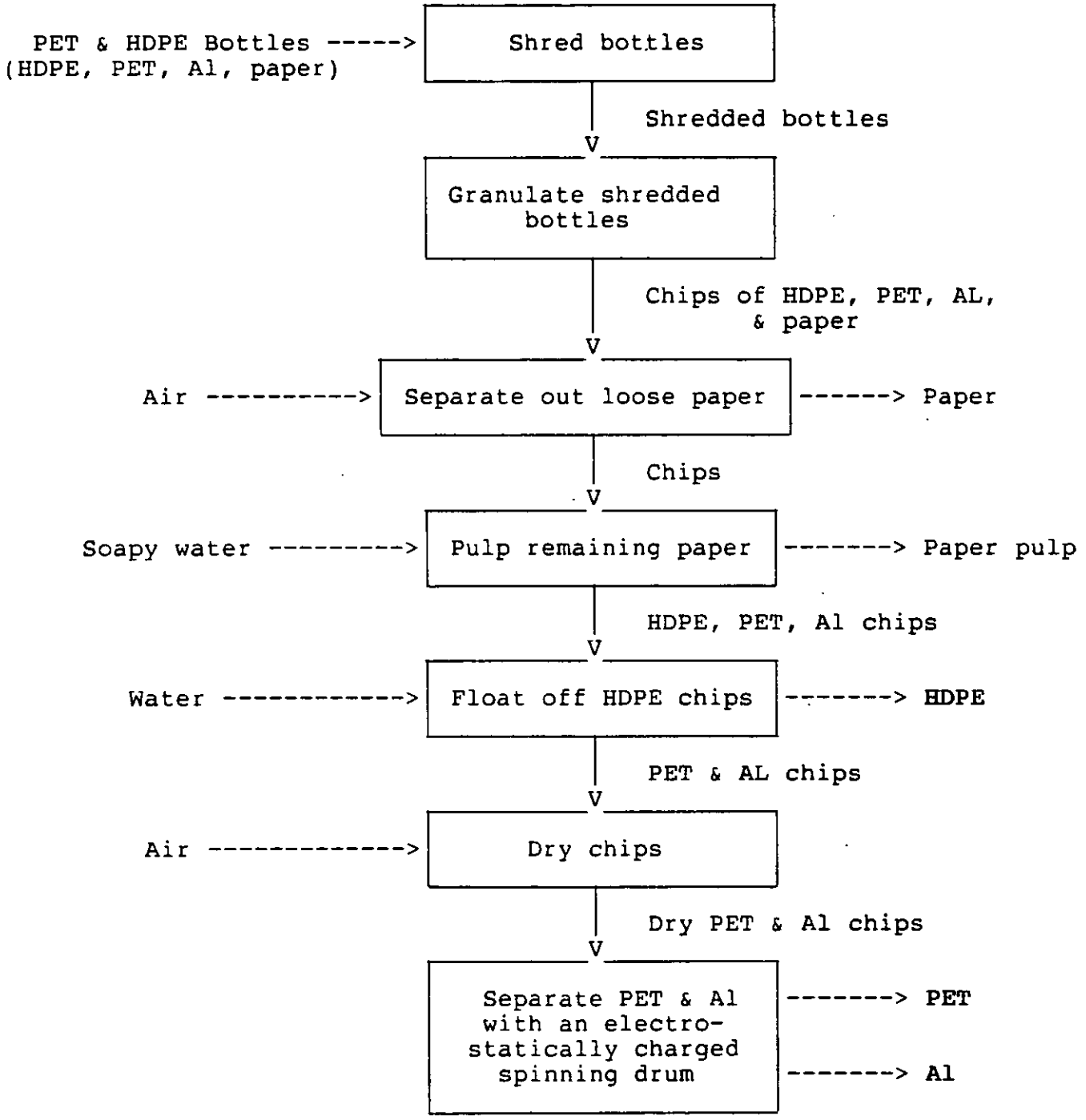
The Center proposes to make its plastics reclamation technology available through a technology transfer program in 1987. For $3000, interested parties will receive a manual containing enough information to allow decisions to be made regarding whether to invest in a reclamation facility modeled after the Center's pilot plant. For $2000, interested parties will receive a week's training in the operation of the reclamation process. If an entrepreneur actually installs a reclamation facility based on the Center's technology, a fee will be owed to the Center for a period of time, fee amount and time to be specified when the Center issues a license to use the technology.

Recommendation:

Information item.

Attachment A

CENTER FOR PLASTICS RECYCLING RESEARCH
PILOT PLANT



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CALIFORNIA WASTE MANAGEMENT BOARD

Agenda Item #15

March 26-27, 1987

Item:

Consideration of a Contract for a Statewide Recycling Study

Key Issues:

- Study to assess potential for recovering aluminum, glass, paper, plastics, and tin from the municipal solid waste stream.
- Current data to provide "baseline" for estimating effect of AB 2020.
- Results would indicate where recycling needs to be fostered and what types of programs might be appropriate in those areas.

Background:

The ability of staff to assess recycling programs and to provide analyses of proposed legislation is limited by a lack of reliable, current data about the potential for recycling. For example, staff lacks the baseline data needed to determine what effect, if any, "the Bottle Bill" will have on the amount of solid waste being recycled. The Board would also benefit by having access to recycling data of the quality available through the Board's litter studies.

Discussion:

A good portion of what we know about recycling comes from studies that are now over six years old. If the Board had better data, staff will be able to evaluate the effect of AB 2020 on the solid

waste stream. Better data would also help staff provide technical assistance to local governments and the private sector to assist in their solid waste management planning. Finally, more current information would enhance the usefulness of the Board-sponsored computer model which allows planners to compare solid waste management options, including recycling alternatives.

The study would focus on residential and commercial solid waste in Los Angeles, Orange, Alameda, San Diego, Santa Clara, Riverside, San Bernardino, Contra Costa, Kern, Sacramento, San Mateo, and San Francisco Counties. According to data in the Comprehensive Plan, these twelve counties accounted for 85 percent of the solid waste generated in California in 1984. The study would evaluate the recycling potential of beverage containers covered by AB 2020, aluminum, glass, tin cans, newspaper, magazines, white paper, corrugated, boxboard, PET and HDPE containers, scrap metal, and white goods. The study would require the following tasks be done:

- Estimation of the availability of recoverable materials in major waste generating counties in California.
- An accounting of the amount of waste currently diverted through materials recovery in each of the selected counties.
- Identification of potentially recoverable materials, such as plastics, which are currently under-recovered in California and determination of the conditions which would need to prevail to increase their recovery.
- Identification of the available secondary materials markets, their capacities, and potential for expansion.
- A literature search of existing studies which provide data on recyclable materials in the solid waste stream in California and on the amounts already being recovered.

Staff expects the study would cost no more than $45,000 to complete as specified above. The study should be completed within six months of the date of issuance of a contract for the study.

Recommendation:

Direct staff to prepare a contract by which the Board will retain a contractor to perform the tasks identified above.

CALIFORNIA WASTE MANAGEMENT BOARD
AGENDA ITEM #16
MARCH 26-27, 1987

Item:

Consideration of USEPA Municipal Waste Landfill and Industrial Surveys

Key Issues:

o The 1984 Hazardous and Solid Waste Amendments (HSWA) to the Resource Conservation and Recovery Act (RCRA) require EPA to conduct a study of the adequacy of existing Subtitle D Criteria to protect human health and the environment and, if necessary, to recommend to the Congress by November, 1987, revisions to the Criteria and additional authorities needed to enforce them.

o EPA has now completed the Subtitle D, Phase I Report (nonhazardous wastes) which included gathering of basic data on waste assessment characterization, Subtitle D facilities and a State Subtitle D program analysis.

o Follow-up surveys on a sample basis under Phase II of the Subtitle D study will provide further specific data. Sixty-five (65) randomly selected California municipal landfill operators will be contacted this year and asked to provide detailed data. EPA will also survey 20,000 industrial waste facilities to collect general information on the amounts of industrial waste generated nationally.

Background:

The EPA is now undertaking additional detailed survey work at randomly selected landfills throughout the United States. In addition they will also be contacting industrial disposal facility operators to begin the process of assessing the magnitude and character of this generally unevaluated aspect of waste management.

After completing the Phase II work, USEPA will analyze the data, and prepare a report to the Congress on the nature of nonhazardous waste management in the United States. The Report will broadly analyze the current and future ability of the existing system to protect the environment, safety and public health. Strengths and deficiencies of the system will be noted,

and recommendations will be made for improvements where necessary. This most likely means that the existing Criteria for classifying and evaluating disposal facilities will be broadened and strengthened. Groundwater standards will also be upgraded, and a more vigorous enforcement program proposed.

A draft report to the Congress is anticipated to be completed for public review by June 30, 1987. The Final Report is due by November 30, 1987.

Recommendation:

Staff recommends that the EPA draft report to the Congress on Subtitle D be thoroughly reviewed and commented on by the Board as soon as it is available.

CALIFORNIA WASTE MANAGEMENT BOARD

Agenda Item # 17

March 26-27, 1987

Item:

Consideration of Relationship between Collection and Storage Practices in Riverside County to Board Statutes and Regulations

Key Issues:

1 - Policy decision on Riverside County collection and storage practices can affect Board regulatory program statewide.

2 - Does the use of 30-yard roll-off bodies for centralized residential collection in a condominium constitute a Small Volume Transfer Station under Board regulations?

3 - Does the hauling of the individual refuse from the residences by landscape contractors to the roll-off body violate state laws regarding who may pick up and haul refuse?

4 - Can public health and safety standards be maintained and enforced unless the practice is permitted as a Solid Waste Facility (Small Volume Transfer Station)?

Background:

During 1986, the Board became aware, through contacts by the Riverside County Local Enforcement Agency (LEA) and others, of certain collection and storage practices at two condominium developments Palm Desert. Specifically, at The Lakes (within the City of Palm Desert) and Palm Valley (in the unincorporated area near Palm Desert) Country Clubs, 30-yard roll-off bodies, left on the premises from the construction and development period, were being used for collection and storage of residential, as well as corporate, refuse, until picked up by the permitted collection company, Palm Desert Disposal.

The question was raised as to whether this practice constituted a Small Volume Transfer Station, which is regulated pursuant to Title 14, California Administrative Code (CAC), Sections 17421-17426. Board Counsel prepared an opinion on this issue on January 13, 1987, finding that the above-described practice did not constitute a Small Volume Transfer Station, pursuant to the exclusion provided by 14 CAC 17421. A copy of this opinion is attached to this Agenda Item as Attachment A.

Another question was raised as to whether the practice of having the landscape contractors pick up residential trash and deposit

it in the roll-off bodies violated any state laws regarding who may pick up or haul refuse. Board Counsel prepared a memo on this issue on January 27, 1987, finding that the practice as described did not violate state law, and that state law gives local governments maximum discretion and flexibility to determine almost all aspects of how or whether solid waste handling and disposal services would be provided to local citizens. A copy of this memo is attached to this Agenda Item as Attachment B.

On January 8, 1987, the Riverside County LEA requested a legal opinion on the practice from Kerry Jones, Enforcement Manager. Board Counsel provided a copy of the January 13 memo to the LEA. On January 13, Richard V. Skodacek, R.S., of the LEA, wrote Board Counsel, describing the situation and its history.

On January 14, Mr. Skodacek wrote Jack Dahlstrum, attorney for Sunrise Corporation, documenting unacceptable conditions with the roll-off bodies, and ordering their replacement with covered dumpsters. On March 4, Mr. Skodacek again wrote Board Counsel, describing the current situation, which now consists of the use of the dumpsters, which are removed twice a week by Palm Desert Disposal. Copies of the correspondence noted in the above two paragraphs are attached together as Attachment C.

On March 11, 1987, Lisa Dernbach, of the Board's Southern California Office, reported a telephone call to Mr. Skodacek. According to Ms. Dernbach, Mr. Skodacek wrote the local landscaping contractors, retained by The Lakes and Palm Valley Country Clubs, expressing the LEA's concerns. Those letters, dated March 4, 1987, and a letter to Attorney Dahlstrum, same date, received as this item was in final preparation, are appended to this item as Attachment E. Mr. Skodacek reports through Ms. Dernbach that Sunshine Landscaping Service (The Lakes) contacted Mr. Skodacek directly and stated that it would not be hauling refuse directly to the landfill anymore, and that six 3-yard dumpsters had been ordered for The Lakes. Mr. Skodacek further reported that, while Southview Landscaping, Inc., (Palm Valley) had not contacted Mr. Skodacek, he learned from Palm Desert Disposal that six 3-yard boxes had also been ordered for Palm Valley, and that Southview would also not be hauling refuse directly to the landfill.

Ms. Dernbach will have visited the area on March 12, and we intend to have slides of the collection and storage area and facilities available for view at the Board meeting. We anticipate that Mr. Skodacek will also be present and available to answer questions.

Analysis:

The Board has regulatory authority over Key Issues Numbers 1, 2 and 4. Key Issue Number 3 is governed by local collection ordinances under virtually complete delegation of authority by state law. Counsel's January 27 memo discusses Key Issue Number 3. The Board has promulgated regulations governing the definition and regulation of transfer stations and the regulation of the public health and environmental aspects of collection and storage. Selected Board regulations, which are referred to herein, are attached to this Item as Attachment D. The definition of a Small Volume Transfer Station (and exclusions from that definition) appear at 14 CAC 17421. Although fully discussed in the January 13 memo from Counsel, several aspects bear repeating here. Small Volume Transfer Stations are those which receive less than 100 cubic yards a day. Certain types of transfer and storage practices are excluded from regulation as Small Volume Transfer Stations, as follows:

1- Community or multi-residence receptacles in locations where there is less than 15-cubic yards of combined container volume;

2- Storage receptacles (with no size limitation) for waste from multi-residential buildings or for commercial solid wastes;

3- Containers used to store salvaged materials.

The intent of the exclusions of 14 CAC 17421 was to exclude all apartment house and shopping center boxes, but to include--in order to regulate--all rural community centrally located refuse boxes. In the final version of the regulation, adopted in 1978, rural roll-off boxes were granted the 15-cubic yard exemption. The factual distinction between the rural and urban use of the roll-off boxes was that there is less supervision and control in the rural areas, because of the low density and distances among users. Although large-scale apartment complexes were considered, large condominium developments had not been specifically contemplated during the regulations drafting stage in 1977 and 1978.

Consideration of a change in the policy of including or excluding regulated facilities should contemplate a regulatory change. In that manner, a change can be drawn as narrowly or as broadly as the Board might wish, without inadvertently bringing under or excluding from regulation other types of operations not contemplated by this discussion.

Existing Board regulations provide support for local regulatory attention to the Riverside-Palm Desert practices: 14 CAC 17331 requires removal of the waste at least weekly or more frequently if the LEA requires, and 14 CAC 17311-17317 establish public health and environmental standards for safe storage of refuse, pending removal. Enforcement of these standards is provided by law, even though no solid waste facilities permits are issued. Government Code Section 66796.51 provides for a $1000.00 daily civil penalty for each violation of Board regulations.

It is important to note that the factual situation which gave rise to this issue may have substantially changed. It appears that uncovered 30-cubic yard roll-off bodies are no longer being used. The LEA has stated that multiple 3-yard dumpsters are in place, and that the landscaping contractors will not be hauling refuse directly to the landfill.

Options:

This is an informational item, intended to be discussed in a workshop-like forum. The Board may articulate existing policy and statutory and regulatory interpretations, may formulate new policy on storage, collection and transfer practices, may direct further study, legislative and regulatory development on the issues, and/or may take no action.

Recommendation:

Inasmuch as this is a workshop item, staff and Counsel make no recommendations pending verification of the facts by Southern California Board staff and the LEA, and pending the discussion by the Board. Counsel's findings on the legal status of certain aspects of this issue have been stated above and are attached hereto.

Attachments

State of California THE RESOURCES AGENCY

Memorandum

To : George T. Eowan
Chief Executive Officer

Date: January 13, 1987

cc: Sherman E. Roodzant, Chairman

Original Signed by:
Robert F. Conheim

Robert F. Conheim

From : CALIFORNIA WASTE MANAGEMENT BOARD

Subject : **Status of 30-Cubic Yard Roll-Off Containers at The Lakes and Palm Valley Country Club**

Question: You have asked me to investigate the legal status of the practice of the two above-subject condominium developments using 30-cubic yard roll-off boxes as a storage facility for the residential refuse of the owners and tenants.

Answer: These facilities are excluded from regulation, under the State Minimum Standards, as small volume transfer stations, per the exclusions listed in Title 14, California Administrative Code (CAC) Section 17421.

Discussion:

The situation has been described as above, with these additional facts:

1. This practice has replaced individual residential refuse collection by the franchised, permitted or licensed hauler (this same hauler does pick up the roll-off box);

2. The roll-off boxes have been observed frequently to be in an overflow, unkempt state;

3. The residents leave their refuse in plastic and paper sacks outside;

4. The groundskeepers of the developments collect the refuse and place it in the roll-off boxes.

Title 14, CAC Section 17421 excludes the following transfer stations from having the State Minimum Standards for Solid Waste Handling and Disposal for small volume transfer stations applied to them:

ATTACHMENT A

1. Community or multi-residence receptacles in locations where there is less than 15 cubic yards of combined container volume;

2. Storage receptacles (with no size limitation) for waste from multi-residential buildings or for commercial solid wastes;

3. Containers used to store salvaged materials.

The roll-off box locations, which are the subject of this memo, are transfer stations within the meaning of the statute, Government Code Section 66723. The regulation simply excludes them from being regulated as small volume transfer stations. As excluded facilities, they are not technically also exempt from being required to obtain permits. This means that, while there are no standards which apply to these facilities as transfer stations, they may, nevertheless be permitted. That appears to be an oversight in unintended regulation. The Board has not applied the permit requirement to other transfer facilities more commonly excluded from the State Minimum Standards. The permit requirement appears in a different area of the law, and has not been conformed to 14 CAC 17421.

This reading of 14 CAC 17421 may uncover other situations where LEAs have been regulating certain small volume transfer stations, which are, in fact, identical or so similar to the situations described above, that they, too, would be excluded from small volume transfer station regulation. The explanation for this situation lies in the fact that the exclusions listed above have never, in practice, been counted as three, but construed as two, with the first and second combined so as to apply the 15-cubic-yard-limit to both of them.

A close reading of the regulation requires the conclusion that the first and second exclusions are separate and different. While there is no explanation for this which is obvious from a literal reading of the text, it would appear that the first refers to on- or off-premise collection bins for use by the inhabitants of multiple residences in a single or multi-unit community. The second exclusion refers to multi-residence buildings, such as joined-unit condominiums, and to commercial refuse containers, such as large roll-off boxes at commercial or industrial "park" sites. There is no volumetric or weight limit attached to this second exclusion. I informally checked with the original drafter of the regulation, Bill Cullen. He indicated that the "intent" was to exclude all apartment house and shopping center boxes, but to include (for regulation) all rural community central refuse boxes. The final version of the regulation almost achieved that, except for excluding regulation of community central refuse boxes of less than 15 cubic yards.

There is an LEA enforcement issue involving the unkempt and overflow condition of the boxes. The Board's standard at 14 CAC 17315 requires property owners and tenants to use

proper storage containers to avoid overflowing. Another minimum standard, 14 CAC 17331 requires pick-up and collection at least weekly unless more frequent collection is required by the LEA. These standards can be enforced, but loss of the permit is not a sanction. The LEA can require more frequent collection of the 30-yard box or the use of additional storage capacity to eliminate the overflow conditions. Civil enforcement with a maximum penalty of $1000.00 a day, per Government Code Section 66796.51 is available.

Any issues concerning whether local contracts or franchises require individual collection as opposed to this centralized collection are beyond the scope of the Board's jurisdiction. In any event, I have not received enough facts to render a gratuitous opinion on such issues.

It should be noted that the Chairman of the LEA, John Fanning, wrote Kerry Jones on January 8, 1987, requesting a legal opinion from the Board. Upon further inquiry, I was informed that the Riverside County Counsel has not been asked, because of LEA perceptions about the workload of that office. The letter from the LEA is attached for your information.

Attachment

State of California THE RESOURCES AGENCY

Memorandum

To : Sherman E. Roodzant, Chairman Date: January 27, 1987

Original Signed by:
Robert F. Conheim

Robert F. Conheim
From : CALIFORNIA WASTE MANAGEMENT BOARD

Subject : Palm Desert Collection Practices

You have asked whether the practice of having the groundskeepers at the above-noted condominium developments conforms to or violates any state laws regarding who may pick up and haul refuse.

My answer is that, based on the facts discussed in earlier memos on this subject, the practice does not appear to violate state laws regarding the provision of solid waste handling and disposal services.

The practice must be filtered through the Riverside County Ordinance (for Palm Valley) and the Palm Desert City Ordinance (for The Lakes). The County Ordinance (Section 8.16.060) requires refuse haulers to have a county permit for hauling on the public streets. It provides some exceptions, namely, the following:

1. contractors or builders removing debris, rubbish and trash from construction sites;

2. nurserymen or gardeners holding valid city business licenses;

3. anyone removing shrubbery, grass, tree cuttings or trimmings or other agricultural debris from property owned or operated by the person; and

4. anyone removing industrial wastes or any person removing large or oversized items from their premises.

The City ordinance (Section 5 of Ordinance 513, as read to me by Dick Skodacek of the LEA) requires a permit under much the same framework, with exceptions, as follows:

ATTACHMENT B

1. persons who haul their own trash from their own residences;

2. refuse produced in the course of conducting one's own business;

3. persons performing occasional hauling for others without compensation.

Neither of the ordinances was enacted in contemplation of the activities under scrutiny here, but both ordinances can be interpreted broadly enough to allow the activities as exempt from the permit requirement. Determination of exemption or nonapplicability of the ordinances would be a local matter, well beyond the scope of this or any state agency. Both ordinances tie the permit to hauling on the public streets. It is my understanding that the activities we are analyzing occur within the boundaries of a closed community and not on the public streets. Exemption 2 of the County ordinance and exemptions 1 and 2 of the City ordinance might apply, although stretching those exemptions to cover these activities was not contemplated by the drafters of these ordinances.

State law has long-allowed local governments to determine almost all aspects of how or, indeed, whether solid waste handling and disposal services would be provided to local citizens. The Health and Safety Code (H&SC) allows counties to allow, permit or contract for refuse services (H&SC Section 4200 et seq.). H&SC Section 4250 allows cities to contract for solid waste handling and disposal services. Government Code (Gov C) Section 66755 et seq., which appear in "our codes," establish the right and power of all local governments to provide or not provide for solid waste handling services by virtually any means, e.g., public operations, or by solid waste enterprises. Local government may also determine how such services, if to be provided at all, are to be provided. Gov C Section 66757 suggests several methods of obtaining and providing such services which might be used, specifically:

> ...nonexclusive franchise, contract, license, permit, or otherwise, either with or without competitive bidding, or, if in the opinion of the governing body, the public health, safety and well-being so require, by partially exclusive or wholly exclusive franchise, contract license, permit, or otherwise, either with or without competitive bidding.

In conclusion, there does not appear to be a state law which would prevent local government from controlling this field of activity completely. The local ordinances in question do not appear to have intended to regulate this matter, the most salient

point of both ordinances being their relation to hauling on the public streets. If it is determined by these local governments that this activity were to fall under the ambit of these ordinances, the exclusions which are listed do not seem to apply directly, and the activity would seem to violate at least the spirit of the schema to grant area-wide permission to one company to provide professional refuse hauling services. I have not actually seen the permits granted to Palm Desert Disposal by the county and the city, nor have I seen any documents stating the company's contract or franchise rights.

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local solid waste management enforcement agency for riverside county

AGENCY MEMBERS:
[redacted] - CHAIRMAN
Deputy Director of Health for Environmental Health
[redacted] Representative of Riverside County Mayors' & Councilmen's Assn.
[redacted], Land Use Administrator - Department of Building & Safety
[redacted], Waste Disposal Engineer - Road Department Representative
[redacted], Representative of C-VAG
AGENCY SECRETARY:
[redacted]

January 8, 1987

Mr. Kerry Jones
California Waste Management Board
1020 9th Street, Suite 300
Sacramento, CA 95814

Dear Mr. Jones:

RE: Illegal Transfer Facilities at Palm Valley Country Club and The Lakes Country Club

In prior correspondence, Local Enforcement Agency staff outlined the controversy regarding the operation procedures in the removal of household solid waste from a condominium development in the city of Palm Desert (The Lakes) and in the unincorporated area (Palm Valley Country Club). The procedures involve the use of 30 cu. yd. roll-off containers utilized by the maintenance people hired by the homeowners associations to pick up the residential trash and rubbish.

Prior to taking any formal action, the Local Enforcement Agency would like a legal opinion from the California Waste Management Board as to whether the planned community homeowners association would be considered a commercial enterprise or multi-residential building under the Title 14, Section 17421 exclusions.

If you have any questions regarding this correspondence, please feel free to contact this office at (714) 787-2316.

Very truly yours,

John M. Fanning, Chairman
Local Enforcement Agency
for Riverside County

ATTACHMENT C

JMF:RVS:dh
cc: Gary King

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JAN 15 1987

local solid waste management enforcement agency for riverside county

AGENCY MEMBERS:
[redacted] - CHAIRMAN
Deputy Director of Health for Environmental Health
[redacted] Representative of Riverside County Mayors' & Councilmen's Assn.
[redacted] Land Use Administrator - Department of Building & Safety
[redacted] Waste Disposal Engineer - Road Department Representative
[redacted] Representative of C - VAG
AGENCY SECRETARY:
[redacted]

January 13, 1987

California Waste Management Board
1020 9th Street, Suite 300
Sacramento, CA 95814

Attn: Mr. Conheim

Gentlemen:

RE: Transfer Stations at The Lakes and Palm Valley Country Clubs - Palm Desert Vicinity

In reference to our telephone conversation regarding the roll-off containers used for rubbish and garbage storage at The Lakes and Palm Valley Country Clubs in Palm Desert, I will try to answer any questions you may have.

There were several gated communities of condominium type resorts which during the construction and landscaping stages were using roll-off bins of 30 cubic yard capacity for storage of waste materials prior to pickup. Four of the communities continued to use these containers after the houses were built and the landscaping maintenance people would collect the bagged or containerized garbage whenever they saw the containers in front of the homes - five or six days a week.

The hauler, Palm Desert Disposal (Waste Management, Inc.), notified this office of the situation. Letters were sent to the four homeowner associations involved. Two of the associations obtained individual collection. However, Palm Valley and The Lakes Country Club communities did not. Both are Sunrise Company developments.

This is when Sam Arakalian noticed the maintenance people, i.e., Vista Verde Landscaping Contractors, picking up bags of trash, placing them into their stake bodied trucks, and hauling it away (presumably to the roll-off container).

A meeting was held after unsuccessful attempts to have the city enforce the city code. Alternate solutions were discussed. An alternative to individual pickup was discussed. My suggestion to have dumpsters placed within the community, accessible to the occupants, was not feasible because of lack of availability of proper locations.

In December, we were informed by Mr. Arakalian that use of any vehicle to transport to the bin would be considered a violation due to the transfer station definition. The subsequent letters were sent with that in mind (the only solution was individual pickup to remain within Title 14 requirements, the city ordinance of Palm Desert, and Riverside County Ordinance 513).

Palm Desert Disposal will abide by any decision made. If asked to remove the bin, they will do so. Sunrise Company is continuing to add to these two communities. The total residences now constructed total approximately 1200. Any final decision made here will have repercussions throughout the state in how waste is handled.

The units are resort type, that is, not all are occupied at the same time. However, there would be no reason why Monday morning would not be a good time for a standard normal pickup by the hauler and another day selected for the excess as a feasible solution for all concerned.

Please contact me if you need any further details to assist you in your determination. I can be reached at (714) 787-6543.

Very truly yours,

Richard V Skodacek

Richard V. Skodacek, R.S.
Supervising Sanitarian

RVS:dh

AGENCY MEMBERS:
[redacted] - CHAIRMAN
Deputy Director of Health for Environmental Health
[redacted], Representative of Riverside County Mayors' & Councilmen's Assn.
[redacted] Land Use Administrator - Department of Building & Safety
[redacted], Waste Disposal Engineer - Road Department Representative
[redacted], Representative of C-VAG
AGENCY SECRETARY:
[redacted]

local solid waste management enforcement agency for riverside county

January 14, 1987

Mr. Jack Dahlstrum
74-133 El Paseo, Suite C
Palm Desert, CA 92260

Dear Mr. Dalstrum:

RE: The Lakes and Palm Valley Country Clubs

We are continuing contact with the California Waste Management Board regarding the transfer station issue. In the meatime, recent investigations made of the solid waste storage facilities of Palm Valley and The Lakes Country Clubs reveal unacceptable facilities.

Until final agreements are made regarding the collection of solid waste from the individual homes, the replacement of the 30 cubic yard roll-off boxes with covered dumpster type containers will be necessary. Please make the arrangements as soon as possible and not later than February 1, 1987.

If you have any questions regarding this correspondence or the placement of the containers, please feel free to contact this office at (714) 787-6543.

Very truly yours,

Richard V. Skodacek

Richard V. Skodacek, R.S.
Supervising Sanitarian

RVS:dh
cc: Ray Burke, Palm Desert Disposal Co.
Wayne Ramsey, Code Enforcement Officer
City of Palm Desert

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AGENCY MEMBERS:
[illegible] - CHAIRMAN
Deputy Director of Health for Environmental Health
LORI GREGG, Representative of Riverside County Mayors' & Councilmen's Assn.
WILLIAM HARVEY, Land Use Administrator - Department of Building & Safety
RAYMOND E. JOHNSON, Waste Disposal Engineer - Road Department Representative
ROLAND TAATGES, Representative of C-VAG
AGENCY SECRETARY:
PAULINE SWAIN

local solid waste management enforcement agency for riverside county

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March 4, 1987

Mr. Robert Conheim, Counsel
California Waste Management Board
1020 9th Street, Suite 300
Sacramento, CA 95814

Dear Mr. Conheim:

RE: The Lakes and Palm Valley Country Clubs Update

The use of rolloff bins has been discontinued since it was not an acceptable method for solid waste storage on the premises of the two country clubs in question.

The Lakes is currently utilizing four dumpster containers which are removed two to three times a week by Palm Desert Disposal (Waste Management, Inc.). It was decided that the maintenance people in the course of their acitivities of trimming, weeding, removing debris, and old furniture, etc., would utilize these containers for deposit of household trash and garbage deposited by the driveways of the occupants of this home type condominium complex. The handling of this household waste is done twice: once to place it on the vehicle and once to remove it from the vehicle and place it into the dumpsters. Since these people are responsible to keep the area clean, the handling is done in a safe, sanitary manner.

Several things could occur in this type of situation: The double handling could be construed as execessive handling, potentially unsafe; or, when the dumpsters become filled, the maintenance crew could decide to haul it to the landfill which would constitute a violation of Riverside County Ordinance 513.

It is the opinion of the LEA staff that the handling of solid waste in the manner described above does not conflict with state guidelines, is not detrimental to the public health, and is within the guidelines of Government Code, Section 66732 and 66757.

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If you need more information, please contact me at (714) 787-6543.

Very truly yours,

Richard V. Skodacek

Richard V. Skodacek, R.S.
Supervising Sanitarian

RVS:dh

cc: J. Fanning, LEA Chairman

17225.69. Solid Wastes or Wastes.

History: 1. Repealer filed 2-21-78; effective thirtieth day thereafter (Register 78, No. 8).

17225.70. Solid Waste Management. "Solid Waste Management" includes a planned program for effectively controlling the generation, storage, collection, transportation, processing and reuse, conversion or disposal of solid wastes in a safe, sanitary, aesthetically acceptable, environmentally sound and economical manner. It includes all administrative, financial, environmental, legal and planning functions as well as the operational aspects of solid waste handling, disposal and resource recovery systems necessary to achieve established objectives.

17225.71. Street Refuse. "Street Refuse" includes materials picked up by manual or mechanical sweeping of alleys, streets or sidewalks, litter from public litter receptacles and material removed from catch basins.

17225.72. Transfer/Processing Station or Station.

History: 1. Repealer filed 2-21-78; effective thirtieth day thereafter (Register 78, No. 8).

17225.73. Vector. "Vector" includes any insect or other arthropod, rodent, or other animal capable of transmitting the causative agents of human disease, or disrupting the normal enjoyment of life by adversely affecting the public health and well being.

17225.74. Written Approval.

History: 1. Repealer filed 2-21-78; effective thirtieth day thereafter (Register 78, No. 8).

Article 5. Solid Waste Storage and Removal Standards

GENERAL

17301. Applicability of Standards. The standards in this Article shall apply to all facilities, equipment, or vehicles used for storage, removal, transport, and other handling of solid wastes.

History: 1. Amendment filed 2-21-78; effective thirtieth day thereafter (Register 78, No. 8).

17302. Conformance with Plan. After the effective date of the county solid waste management plan required by Section 66780 of the Government Code, solid waste storage and removal shall be in conformance with said plan.

STORAGE OF SOLID WASTES

17311. General. The owner, operator and/or occupant of any premise, business establishment, industry, or other property, vacant or occupied, shall be responsible for the safe and sanitary storage of all solid waste accumulated on the property.

17312. Storage. (H) In all cases in which garbage and rubbish are combined, the standards for garbage shall prevail. The property owner or occupant shall store solid waste on his premises or property or shall require it to be stored or handled in such a manner so as not to promote the propagation, harborage, or attraction of vectors, or the creation of nuisances.

ATTACHMENT D

17313. **Design Requirements.** The design of any new, substantially remodeled or expanded building or other facility shall provide for proper storage or handling which will accommodate the solid waste loading anticipated and which will allow for efficient and safe waste removal or collection. The design shall demonstrate to local land use and building permit issuing authorities that it includes the required provisions.

17314. **Operator Responsibility.** Where the collection operator furnishes storage containers, he is responsible for maintaining the containers in good condition (ordinary wear and tear excepted) unless they are furnished under other terms, conditions, or agreements. He shall plan with the property owner and/or occupant as to placement of storage containers to minimize traffic, aesthetic and other problems both on the property and for the general public.

17315. **Garbage Containers.** (H) Property owners and tenants shall deposit all garbage and putrescible matter or mixed garbage and rubbish in containers which are either non-absorbent, water-tight, vector-resistant, durable, easily cleanable, and designed for safe handling, or in paper or plastic bags having sufficient strength and water tightness and which are designed for the containment of refuse. Containers for garbage and rubbish should be of an adequate size and in sufficient numbers to contain without overflowing, all the refuse that a household or other establishment generates within the designated removal period. Containers when filled shall not exceed reasonable lifting weights for an average physically fit individual except where mechanical loading systems are used. Containers shall be maintained in a clean, sound condition free from putrescible residue.

17316. **Identification of Containers.** Containers of one cubic yard or more owned by the collection service operator shall be identified with the name and telephone number of the agent servicing the container.

17317. **Use of Container.** No person shall tamper with, modify, remove from, or deposit solid wastes in any container which has not been provided for his use, without the permission of the container owner.

SOLID WASTE REMOVAL AND COLLECTION

17331. (H). **Frequency of Refuse Removal.** The owner or tenant of any premises, business establishment or industry shall be responsible for the satisfactory removal of all refuse accumulated by him on his property or his premises. To prevent propagation, harborage, or attraction of flies, rodents or other vectors and the creation of nuisances, refuse, except for inert materials, shall not be allowed to remain on the premises for more than seven days, except when:

(a) disruptions due to strikes occur, or

(b) severe weather conditions or "Acts of God" make collection impossible using normal collection equipment, or

(c) official holidays interrupt the normal seven day collection cycle in which case collection may be postponed until the next working day. Where it is deemed necessary by the local health officer because of the propagation of vectors and for the protection of public health, more frequent removal of refuse shall be required.

History: 1. Amendment filed 7-25-78; effective thirtieth day thereafter (Register 78, No. 30).

17332. Regulation of Operators. Each person providing residential, commercial, or industrial solid waste collection services shall comply with all local government licenses, permits or written approval requirements applicable to the city or county in which such services are provided. Such written approval shall be contingent upon the operator's demonstrated capability to comply with these standards and use of equipment which is safe and sanitary. Each enforcement agency of solid waste collection shall maintain a complete listing of all persons holding written approvals to provide solid waste collection services within its jurisdiction. The listings shall contain the name, office, address, telephone number and emergency telephone number if different of each such person, the number and types of vehicles employed by such person in providing such solid waste collection services, and the types of materials authorized for handling.

History: 1. Amendment filed 7-25-78; effective thirtieth day thereafter (Register 78, No. 30).

17333. Operator Qualifications. When a city, county or special district authorizes or designates a person or firm to provide solid waste collection services within the territory under its jurisdiction through contract, franchise, permit, or license the local government shall obtain proof that such person or firm has adequate financial resources and experience to properly conduct the operation authorized. The facts needed to establish proof shall include but not be limited to the following:

(a) The filing of a performance bond or equivalent security with the local government in a reasonable amount, together with

(b) Evidence submitted to the local government and to the enforcement agency that the person or firm has experience sufficient to meet the needs of the situation within the jurisdiction.

History: 1. Amendment filed 7-25-78; effective thirtieth day thereafter (Register 78, No. 30).

17334. Ownership of Waste Materials. Solid wastes subject to collection by a collection service operator shall become the property of the collection service operator subject to local ordinances or contract conditions after such time as the authorized collector takes possession of the wastes.

17412. Compliance with Conditions.

History: 1. Repealer filed 2-21-78; effective thirtieth day thereafter (Register 78, No. 8).

17413. Conformance with Plan. Each station constructed, substantially remodeled or substantially expanded after the date of approval of the county solid waste management plan, as required by Section 66780 of the Government Code, shall be in conformance with said plan.

STANDARDS FOR SMALL VOLUME TRANSFER STATIONS

17421. Exclusions. These standards shall not be construed to apply to those locations where less than 15 cubic yards of combined container volume is provided to serve as community or multi-residence receptacles for residential refuse, nor do they apply to storage receptacles for waste from multi-residential buildings or for commercial solid wastes; a container used to store construction or demolition wastes at the place of generation; or containers used to store salvaged materials.

17422. Design. The engineering design of proposed new small volume transfer stations shall be in accordance with the principles and disciplines in the State of California generally accepted for design of this type of facility. The design of each new small volume transfer station shall be submitted to the Enforcement Agency for review.

17423. Plan of Operation. Each operator of a small volume transfer station shall prepare and submit to the Enforcement Agency a plan of operation for the station summarizing procedures for handling complaints, maintenance, health and safety, site controls, and frequency of removal of wastes from the station.

17424. Records. An annual report shall be made to the Enforcement Agency reporting the estimated weights or volumes handled during the previous year and listing special occurrences such as fires, injury, property damage, accidents, explosions, incidents regarding hazardous wastes, flooding, and other unusual occurrences.

17425. Small Volume Transfer Station Operation. (H) Small volume transfer stations shall be operated in conformance with good operating practices which result in minimal public health and safety hazards, minimal vector propagation, containment of waste materials, pickup of litter, control of drainage and nuisances, and shall comply with those requirements of the Enforcement Agency adopted to achieve these results.

17426. (H). Cleaning and Waste Removal Frequency. The small volume transfer station shall be thoroughly cleaned weekly or as required in the solid waste facilities permit. Any solid wastes deposited at the site shall be removed weekly or as required in the solid waste facilities permit.

History: 1. Amendment filed 7-25-78; effective thirtieth day thereafter (Register 78, No. 30).

local solid waste management enforcement agency for riverside county

AGENCY MEMBERS:
D. R. BOLING - CHAIRMAN
Deputy Director of Health for Environmental Health
[illegible] GREGG, Representative of Riverside County Mayors' & Councilmen's Assn.
WILLIAM HARVEY, Land Use Administrator - Department of Building & Safety
RAYMOND E. JOHNSON, Waste Disposal Engineer - Road Department Representative
ROLAND TAATGES, Representative of C-VAG
AGENCY SECRETARY:
PAULINE SWAIN

REPLY TO: P.O. Box 1370
Riverside, CA 92502

March 4, 1987

Sunshine Landscaping Service
P.O. Box 1008
Rancho Mirage, CA 92270

Gentlemen:

On June 25, 1986, your company was notified that hauling of household trash and garbage was a violation of Riverside County Oridinance 513.2, Section 5. On March 2, 1987, a vehicle (License # 2K35945) was loaded with household trash collected at The Lakes Country Club in the city of Palm Desert. The same vehicle was observed dumping its load at the county landfill at Edom Hill on the morning of March 3, 1987.

You are hereby directed to cease and desist this practice immediately or the matter will be turned over to the District Attorney for legal action.

If you have any questions regarding this correspondence, please feel free to contact this office at (714) 787-6543.

Very truly yours,

Richard V. Skodacek

Richard V. Skodacek, R.S.
Supervising Sanitarian

RVS:dh
cc: Jack Dahlstrum, Attorney for
Lakes and Palm Valley Country Clubs
Carlos Ortega, City Manager, Palm Desert

ATTACHMENT E

AGENCY MEMBERS:
~~B. R. BOLING~~ - CHAIRMAN
Deputy Director of Health for Environmental Health
~~LORI GREGG~~, Representative of Riverside County Mayors' & Councilmen's Assn.
~~WILLIAM HARVEY~~, Land Use Administrator - Department of Building & Safety
~~RAYMOND E. JOHNSON~~, Waste Disposal Engineer - Road Department Representative
~~ROLAND TAATGES~~, Representative of C - VAG
AGENCY SECRETARY:
~~PAULINE SWAIN~~

local solid waste management enforcement agency for riverside county

March 4, 1987

Mr. Jack Dahlstrum, Attorney
74-133 El Paseo, Suite C
Palm Desert, CA 92260

Dear Mr. Dahlstrum:

RE: Palm Valley and The Lakes Country Clubs

At the meeting on November 4, 1986, it was decided that dumpsters were to be utilized for the deposit of trash and garbage from the individual households at The Lakes Country Club, and we were assured that the landscaping contractors or maintenance personnel would collect the trash and garbage, utilize the dumpsters and definitely not haul to the landfill in violation of existing codes of the city of Palm Desert and the County of Riverside.

During a recent investigation, Environmental Health staff found that the 12 cubic yards of containers at The Lakes were adequate with two or three times a week pickup. Upon further investigation, Sunshine Landscape Service and Vista Verde (Southview Landscaping) were observed and photographed hauling this trash to the landfill.

This item has been placed on the California Waste Management Board agenda, and I had hoped to finalize the report and close out the file at that time.

Unless we receive cooperation from management of The Lakes Country Club and Palm Valley Country Club, we must revert to the only alternative: individual pickup by the legally licensed contractor, Palm Desert Disposal.

Please notify this office of your intentions as soon as possible.

If you have any questions regarding this correspondence, please feel free to contact me at (714) 787-6543.

Very truly yours,

Richard V. Skodacek

Richard V. Skodacek, R.S.
Supervising Sanitarian

RVS:dh

local solid waste management enforcement agency for riverside county

AGENCY MEMBERS:
~~D. R. BOLING~~ - CHAIRMAN
Deputy Director of Health for Environmental Health
~~LORI GREGG~~, Representative of Riverside County Mayors' & Councilmen's Assn.
~~WILLIAM HARVEY~~, Land Use Administrator - Department of Building & Safety
~~RAYMOND E. JOHNSON~~, Waste Disposal Engineer - Road Department Representative
~~ROLAND TAATGES~~, Representative of C - VAG
AGENCY SECRETARY:
~~PAULINE GWAIN~~

REPLY TO: P.O. Box 1370
Riverside, CA 92502

March 4, 1987

Southview Landscaping, Inc.
(Vista Verde Corp.)
40-495 Eldorado Drive
Indian Wells, CA 92260

Gentlemen:

On June 25, 1986, your company was notified that hauling of household trash and garbage was a violation of Riverside County Ordinance 513.2, Section 5. On March 3, 1987, a vehicle (License # 2F51675) exited Palm Valley Country Club and hauled household trash and garbage to Coachella Landfill.

You are hereby directed to cease and desist this practice immediately or the matter will be turned over to the District Attorney for legal action.

If you have any questions regarding this correspondence, please feel free to contact this office at (714) 787-6543.

Very truly yours,

Richard V. Skodacek

Richard V. Skodacek, R.S.
Supervising Sanitarian

RVS:dh
cc: Jack Dahlstrum, Attorney for
Lakes and Palm Valley Country Clubs

Final to Kay 3/17/87

CALIFORNIA WASTE MANAGEMENT BOARD

Agenda Item #15

March 26-27, 1987

Item:

Consideration of a Contract for a Statewide Recycling Study

Key Issues:

- Study to assess potential for recovering aluminum, glass, paper, plastics, and tin from the municipal solid waste stream.
- Current data to provide "baseline" for estimating effect of AB 2020.
- Results would indicate where recycling needs to be fostered and what types of programs might be appropriate in those areas.

Background:

The ability of staff to assess recycling programs and to provide analyses of proposed legislation is limited by a lack of reliable, current data about the potential for recycling. For example, staff lacks the baseline data needed to determine what effect, if any, "the Bottle Bill" will have on the amount of solid waste being recycled. The Board would also benefit by having access to recycling data of the quality available through the Board's litter studies.

Discussion:

A good portion of what we know about recycling comes from studies that are now over six years old. If the Board had better data, staff will be able to evaluate the effect of AB 2020 on the solid

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waste stream. Better data would also help staff provide technical assistance to local governments and the private sector, to assist in their solid waste management planning. Finally, more current information would enhance the usefulness of the Board-sponsored computer model which allows planners to compare solid waste management options, including recycling alternatives.

list

The study would focus on residential and commercial solid waste in Los Angeles, Orange, Alameda, San Diego, Santa Clara, Riverside, San Bernardino, Contra Costa, Kern, Sacramento, San Mateo, and San Francisco Counties. According to data in the Comprehensive Plan, these twelve counties accounted for 85 percent of the solid waste generated in California in 1984. The study would evaluate the recycling potential of beverage containers covered by AB 2020, aluminum, glass, tin cans, newspaper, magazines, white paper, corrugated, boxboard, PET and HDPE containers, scrap metal, and white goods. The study would require the following tasks be done:

Slide 2 - Do last

- Estimation of the availability of recoverable materials in major waste generating counties in California.

- An accounting of the amount of waste currently diverted through materials recovery in each of the selected counties.

- Identification of potentially recoverable materials, such as plastics, which are currently under-recovered in California and determination of the conditions which would need to prevail to increase their recovery.

- Identification of the available secondary materials markets, their capacities, and potential for expansion.

- A literature search of existing studies which provide data on recyclable materials in the solid waste stream in California and on the amounts already being recovered.

Staff expects the study would cost no more than $45,000 to complete as specified above. The study should be completed within six months of the date of issuance of a contract for the study.

Recommendation:

Direct staff to prepare a contract by which the Board will retain a contractor to perform the tasks identified above.

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