

From: Evan Edgar <evan@edgarinc.org>
Sent: Thursday, January 14, 2016 5:31 PM
To: Oliver, Nicholas@CalRecycle
Cc: De Bie, Mark@CalRecycle; Smithline, Scott@CalRecycle; Markie, Susan@CalRecycle
Subject: L&D Landfill SWFP Staff Report - JTD is not "complete and correct" - Cannot concur with SWFP Revision

Oliver:

Thanks for notice on the L&D SWFP Staff Report. I had a good meeting with Mark DeBie and provided me the opportunity to discuss and alerted me of this Staff Report coming out.

This Staff Report is setting new metrics and policies on ADC use, that I will have to contest. CalRecycle, the LEA, and the operator have contorted industry standards with new densities and methodologies to determine ADC use that have never been used before, not at CIWMB or any other agency. Please provide the technical documentation and the math to justify the approach in the Staff Report. Hold on about using soil densities to accept ADC abuse. Please provide the math.

Plus there are policy implications that the JTD and operating according to the JTD is not construed as violating state minimum standards, because the facility is *operator according to the operator*. The JTD clear is clear on ADC use, specifications, etc, where the JTD is not "complete and correct" now with current ADC use and operations, and thus a violation now where CalRecycle cannot concur.

I can meet on Jan 25 to discuss in a private meeting with whoever, and reserve the right to testify at the CalRecycle monthly meeting under the permit section on why CalRecycle is creating this new ADC abuse policies that all landfill operates can enjoy.



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