



90 New Montgomery Street, Suite 1010
San Francisco, CA 94105
(415) 281-8730
(415) 281-8735 FAX
www.techlawinc.com

January 17, 2006

Mr. David Darlington, Chair
ALRRF - Community Monitor Committee
City of Livermore, Public Services Department
3500 Robertson Park Road
Livermore, CA 94550

Subject: ALRRF Community Monitor Progress Report No. 7

Dear Mr. Darlington:

Attached is the report of the December 13, 2005 and January 6, 2006 landfill inspections and other activities conducted by TechLaw since the Altamont Landfill Community Monitor Report No. 6, dated November 21, 2005.

Please feel free to call me at (415) 281-8730 or email me at lkoch@techlawinc.com if you have any questions or concerns regarding this Report. We look forward to the opportunity to continue providing technical support to the Community Monitor Committee.

Sincerely,

Lori Koch, P.E.
Project Manager

LK:KB:sm

ALT012 - ALRF Inspection Report No. 7.wpd



**ALTAMONT LANDFILL AND RESOURCE RECOVERY FACILITY
COMMUNITY MONITOR PROGRESS REPORT NO. 7**

Prepared For:

**Community Monitor Committee
Altamont Landfill Settlement Agreement
City of Livermore Public Services Department
3500 Robertson Park Road
Livermore, California 94550**

Prepared By:

**TechLaw Inc.
90 New Montgomery Street, Suite 1010
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COMMUNITY MONITOR PROGRESS REPORT NO. 7**

DOCUMENTS REVIEWED

2004-2005 Annual Report for Storm Water Discharge, Altamont landfill and Resource Recovery Facility, Alameda County, California, dated June 28, 2005

ALRRF operates under an Industrial Activities Storm Water General Permit. Stormwater samples are collected twice per year at the discharge points from Basins A, B, and C. Samples were analyzed for pH, total suspended solids, specific conductance, oil and grease, chemical oxygen demand, total dissolved solids, chloride, sulfate, nitrate and metals as required by the General Permit and the Waste Discharge Requirements (WDRs) for ALRRF. There are no numeric limits for the tested parameters; however, the total suspended solids present in discharge from Basin C in February 2005 was very high, 97,000 milligrams per liter (mg/l). Results for Basins A and B in February were 280 and 1,800 mg/l respectively.

Other permit requirements:

- No non-storm water discharges were observed during quarterly inspections.
- Visual observations of storm water discharges were conducted on eight occasions (once per month during rainy season is required).
- Best management practices (BMP) were evaluated and deficiencies were noted for each potential pollutant source.

Monthly Tonnage Reports for October and November, 2005

The average total daily disposal quantity is well within the 11,500 tons per day permitted maximum and the 7,000 tons per day settlement agreement limit. The monthly tonnage reports include the type, source, and quantity of alternate daily cover (ADC) materials received at ALRRF, as required by the settlement agreement.

Combined Title V Semi-Annual and Partial 8-34 Annual Report December 1, 2004 through May 31, 2005

- The gas collection system was not shut down for more than five days consecutively.
- The target gas flow rate was not achieved for 99.85 hours from January 1, 2004 through December 31, 2004 out of a total of 240 hours allowed by the Bay Area Air Quality Management District (BAAQMD).
- The target gas flow rate was not achieved 180.2 hours between January 1, 2005 and May 31, 2005.
- The target gas flow rate was recalculated (from 2,381 standard cubic feet per minute (scfm) to 1,497 scfm) and is pending BAAQMD approval.
- Turbines maintained temperature above 855 and did not exceed 1,378 thousand thousand British thermal units (MMBTU)/day heat input at any time.
- Internal Combustion (IC) engines did not exceed daily carbon monoxide (CO) concentration limit of 330 parts per million (ppm) at any time.
- Flare maintained 1,400 degree Fahrenheit combustion zone temperature during the reporting period and did not exceed 1,704 MMBTU/day heat input limit.
- Hydrogen sulfide was less than the 150 parts per million (ppm) limit on all monthly monitoring dates.
- ALRRF did not accept VOC contaminated soil greater than 50 ppm by weight.
- The carbon emission rate from VOC contaminated soil did not exceed 15 pounds per day as calculated in the Report.
- ALRRF is requesting a variance from the 15 pound per day carbon limit for VOC contaminated soil - a major Title V modification.
- No methane was detected in permanent gas monitoring wells.

Waste Acceptance Limitations - Quantities Limited by the Settlement Agreement - WMAC Table

The quantity of sludge, inert waste and special waste received from outside Alameda and San Francisco Counties has been well within the 60,000 tons per year limit since 2001. The quantity of sludge, inert waste and special waste from outside the nine Bay Area counties did not exceed the 7,500 tons per year limit. In addition, the self-haul from Contra Costa county has been within the 15,000 tons per year limit since 1999.

According to the Settlement Agreement, after the expansion date, no sludges, inert waste and special waste shall be accepted from outside the nine Bay Area counties, and the banking provisions will not apply.

LANDFILL INSPECTION 12/13/05

A night inspection of the landfill was conducted on December 13, 2005 at 8:00 p.m. Because the offices were closed at this time, documentation maintained at ALRRF was not reviewed. Also, truck counts were not conducted.

Observation of Environmental Controls

Dust

There was no wind and very little dust generated.

Vectors

No birds were observed. No bird cannons were operating. According to Neil Wise, Landfill Operations Manager, bird cannons only operate between the hours of 7 a.m. and 4 p.m. Furthermore, birds are generally not active at ALRRF at night.

Cover

The condition of cover could not be observed. The area of the tippers and working face was illuminated, but the rest of the landfill area was in darkness.

Litter

The quantity of litter could not be determined due to darkness.

Tour of the landfill with WM Operations Manager Neil Wise and WM Environmental Compliance Specialist Teresa Dominick to observe nighttime landfill operations

- Observed preparations for winter rains. Stormwater facilities are being prepared. Road building and surface preparation are underway (winterizing). Surfaces need to be prepared to support trucks and prevent erosion as much as possible.
- Observed area where appliances are stored prior to sending to recycler. Hazardous parts are removed onsite by "Freon Free".
- The main activity at night is transfer trucks. About 80 trucks come from San Francisco during the night (20 trucks, four rounds each) and a similar number come from Davis Street transfer facility. The transfer facility operates during the night.
- Equipment maintenance continues during the night; observed equipment maintenance area where a dozer was being steam-cleaned.
- Other operations such as tire shredder cease at night..

LANDFILL INSPECTION 1/6/06

Documentation Maintained at Landfill

Load Check Reports (through 12-23-05)

Since the last inspection, TV monitors, microwaves, compressed gas cylinders, a refrigerator, vehicle batteries, containers of hazardous liquids, and tires have been pulled from loads.

Asbestos Disposal Area Daily Operating Inspection Records for 2005 (10-13-05 through 12-29-05)

Fencing has been under construction for much of this period. No sign at the entrance on 12-28-05 and 12-29-05. (A temporary fence was observed during TechLaw's inspection.) Records on 11-15-05 and 11-16-05 indicated that cover needed to be compacted to prevent erosion. (No erosion in the asbestos area was observed during TechLaw's inspection).

Special Occurrences Log

- A gas well was damaged by a contractor on 10-12-05
- Equipment turnover on 10-31-05
- Accident: compactor collided with dump truck on 11-26-05

LEA Reports

- Violation on 10-6-05: exposed waste, daily cover not adequate. Cover was fixed by 10-14-05.
- No violations in November.
- Major ponding was observed in December. No violations.

Observation of Environmental Controls

Dust

No dust observed. Very wet and muddy conditions.

Vectors

Numerous birds observed. According to Mr Wise, bird guns often don't work when there is moisture. None were operating during the inspection.

Cover

Three big washouts were observed in the face of the closed portion of the landfill. These areas will be repaired when conditions are dry enough to allow equipment access. Some erosion of roads was observed, but not deep enough to expose waste. Some ponding was observed in flat areas of the cover in the active portion of the landfill.

Odors

Very little odor.

Litter

The litter fences were clean. Very little litter observed.

Truck Traffic

6:45 -7:45 AM: A total of 28 trucks. The limit is 50.

7:45 - 8:45 AM: A total of 31 trucks were counted. The limit is 50.

Stormwater Controls

TechLaw looked at sedimentation Basins A and C with Ms. Dominick. Observed locations where samples are collected for Annual Storm Water Discharge report. Water was observed to be discharging from Basin C during the inspection. The water in the sedimentation basins was very turbid as was the water discharged to the ditch along Altamont Pass Road.

Tour of the landfill with Neil Wise and Teresa Dominick

Conditions at ALRRF are very wet and muddy; however, aside from the major washouts in the closed portion of the landfill, there appears to be very little erosion. Due to wet and windless conditions, there is very little litter and dust. Trucks are power washed as they leave the working area of the landfill before entering paved roads. Ponding is an issue this time of year and some ponding in flat areas was observed. Ponding is corrected if it is determined to present a problem, but filling low areas does not work, as adding material only make the area sink lower.

ALTERNATE DAILY COVER

Evaluation of Measure D with Regard to ADC

As requested by the CMC, TechLaw has included documentation of a phone conversation with Tom Padilla of stopwaste.org regarding the requirements of Measure D with regard to ADC. Mr. Padilla stated that it is not a requirement for ALRRF to count ADC as disposal in calculating disposal quantities. The memo of this phone conversation is attached.

Green Waste

ALRRF receives curbside processed green waste from Lodi and the Valley. Green waste that comes to ALRRF is processed for use as ADC. Green waste from Livermore is temporarily staged prior to transfer to Grover Landscaping for composting.

FUTURE WORK

TechLaw will continue to conduct landfill inspections. In addition, Techlaw will complete reviews of documents received including the Combined Title V Semi-Annual and Partial 8-34 Annual Report June 1, 2005 through November 30, 2005, by Shaw Environmental, Inc, and respond to any requests from the Community Monitor Committee.

REFERENCES

GeoSyntec Consultants, April 2005. Joint Technical Document, Altamont Landfill and Resource Recovery Facility, Alameda County, California.

SCS Engineers, June 28, 2005. 2004-2005 Annual Report for Storm Water Discharge, Altamont Landfill and Resource Recovery Facility, Alameda County, California.

Shaw Environmental, Inc., June 29, 2005. Combined Title V Semi-Annual and Partial 8-34 Annual Report for the Altamont Landfill and Resource Recovery Facility, December 1, 2004 through May 31, 2005.

Waste Management, 2005. Table of waste limitations with respect to the settlement agreement generated from scale reports revised 1/4/06.

Waste Management, 2005. Monthly Tonnage Reports for October and November.

TELEPHONE MEMORANDUM


TECHLAW, INC.

90 New Montgomery St, Suite 1010

San Francisco, California 94105

(415) 281-8730

Fax: (415) 281-8735

To: Altamont File
From: Lori Koch 
Date: December 14, 2005; 11:13 am
Subject: Conversation with Tom Padilla at stopwaste.org

On September 21, 2005 I spoke with Tom Padilla, recycling director, at Stopwaste.org ((510) 614-1699) regarding the interpretation of Alameda County's Measure D with respect to the calculation of alternative daily cover (ADCs) as disposal. He informed me that Measure D does not require landfills to calculate ADC as disposal. ADC may be calculated as disposal by the county in order to measure progress toward recycling goals, but this does not affect the landfill's calculation of disposal quantities.