COMMUNITY MONITOR COMMITTEE
Altamont Landfill Settlement Agreement

www.altamontcmc.org

*** The Public is Welcome to Attend***

AGENDA

DATE: **Wednesday, April 8, 2026**
TIME: **4:00 p.m.**
PLACE: City of Livermore
Maintenance Services Center
3500 Robertson Park Road

1. Call to Order
2. Introductions
3. Roll Call
4. Approval of Minutes (From January 14, 2026)
5. Open Forum — This is an opportunity for members of the audience to comment on a subject not listed on the agenda. No action may be taken on these items.
6. Matters for Consideration
   - **6.1 Responses to Committee Member Questions**
   - **6.2 Water Board Requests**
   - **6.3 Review of Documents on GeoTracker website**
   - **6.4 Review of Emission and Groundwater Reports**
   - **6.5 PFAS Updates**
   - **6.6 Reports from Community Monitor**
   - **6.7 Announcements (Committee Members)**
7. Agenda Building

   This is an opportunity for the Community Monitor Committee Members to place items on future agendas.

8. Adjournment

   The next regular Community Monitor Committee meeting is tentatively scheduled to take place at 4:00 p.m. on **July 8, 2026,** at 3500 Robertson Park Road, Livermore.

Informational Materials:

- Community Monitor Roles and Responsibilities
- List of Acronyms

City of Livermore

HOW TO PARTICIPATE IN A COMMUNITY MONITOR COMMITTEE MEETING:

You can participate in the meeting in a number of ways:

The **Community Monitor Committee Agenda and Agenda Reports** are prepared by the Community Monitor and City staff and are available for public review on Wednesday evening, seven days prior to the Community Monitor Committee meeting at the Maintenance Service Center, 3500 Robertson Park Road, Livermore. The agenda is also available at http://altamontcmc.org/.

Under Government Code §54957.5, any **supplemental material** distributed to the members of the Community Monitor Committee after the posting of this agenda will be available for public review at the Maintenance Service Center, 3500 Robertson Park Road, Livermore, and included in the agenda packet available at http://altamontcmc.org/.

PURSUANT TO TITLE II OF THE AMERICANS WITH DISABILITIES ACT (CODIFIED AT 42 UNITED STATES CODE SECTION 12101 AND 28 CODE OF FEDERAL REGULATIONS PART 35), AND SECTION 504 OF THE REHABILITATION ACT OF 1973, THE CITY OF LIVERMORE DOES NOT DISCRIMINATE ON THE BASIS OF RACE, COLOR, RELIGION, NATIONAL ORIGIN, ANCESTRY, SEX, DISABILITY, AGE OR SEXUAL ORIENTATION IN THE PROVISION OF ANY SERVICES, PROGRAMS, OR ACTIVITIES. TO ARRANGE AN ACCOMMODATION IN ORDER TO PARTICIPATE IN THIS PUBLIC MEETING, PLEASE CONTACT THE ADA COORDINATOR AT ADACOORDINATOR@LIVERMORECA.GOV OR CALL (925) 960-4170 (VOICE) OR (925) 960-4104 (TDD) AT LEAST THREE (3) BUSINESS DAYS IN ADVANCE OF THE MEETING.

Submission of Comments Prior to the Meeting:

Email Comments may be submitted by the public to the City of Livermore Public Works Department via email at SolidWaste_Recycling@livermoreca.gov. Items received by 12:00 pm on the day of the meeting will be provided to the Committee and will be available on the meeting agenda prior to the meeting. These items will not be read into the record.

Submission of Comments During the Meeting:

During the meeting, the Open Forum agenda item is an opportunity for the public to speak regarding items not listed on the agenda. Speakers may also provide comments on any item listed on the agenda. Speakers are limited to a maximum of 500 words per person, per item. The Committee is prohibited by State law from taking action on any items that are not listed on the agenda. However, if your item requires action, the Committee may place it on a future agenda or direct staff to work with you and/or report to the Committee on the issue.

For questions regarding the Community Monitor Committee, please contact Public Works at (925) 960-8015.

Community Monitor Committee Roles and Responsibilities

Below is a summary of the duties and responsibilities of the Community Monitor Committee and related parties as defined by the Settlement Agreement between the County of Alameda, the City of Livermore, the City of Pleasanton, Sierra Club, Northern California Recycling Association, Altamont Landowners Against Rural Mismanagement, and Waste Management of Alameda County, Inc. The purpose of this document is to aid in determining if discussion items are within the scope of the Community Monitor Committee.

Community Monitor Committee's Responsibilities
Under Settlement Agreement section 5.1.2, the CMC is responsible for supervising and evaluating the performance of the Community Monitor as follows:

A. Interviewing, retaining, supervising, overseeing the payment of, and terminating the contract with the Community Monitor;

B. Reviewing all reports and written information prepared by the Community Monitor; and

C. Conferring with the Community Monitor and participating in the Five Year Compliance Reviews (next due in 2030) and the Mid-Capacity Compliance Review (due when the new cell is constructed and capacity is close to 50%, unlikely to occur before 2028) (Condition number 6 of Exhibit A of the Agreement).

Community Monitor's Responsibilities
The Community Monitor supplements and confirms the enforcement efforts of the County Local Enforcement Agency. The Community Monitor is primarily responsible for:

A. Reviewing any relevant reports and environmental compliance documents submitted to any regulatory agency (sections 5.7.1, 5.7.2, and 5.7.3);

B. Advising the public and the Cities of Livermore and Pleasanton about environmental and technical issues relating to the operation of the Altamont Landfill via the CMC (section 5.7.4);

C. Presenting an annual written report summarizing the Altamont Landfill's compliance record for the year to the CMC and submitting the report to Alameda County and the Cities of Livermore and Pleasanton (section 5.7.5);

D. Notifying the County Local Enforcement Agency and Waste Management of Alameda County of any substantial noncompliance findings or environmental risk (section 5.7.6);

E. Monitoring and accessing the Altamont Landfill site and conducting inspections (section 5.7.7);

F. Counting trucks arriving at the Altamont Landfill (section 5.7.8); and

G. Reviewing waste testing data and source information (section 5.7.9).

Waste Management of Alameda County's Responsibilities
Per the settlement agreement, Waste Management is responsible for:

A. Paying for the services of the Community Monitor, based on an annual cost estimate (section 5.3.3).

B. Paying an additional 20% over the annual cost estimate if warranted based on "credible evidence" (section 5.3.3).

List of Acronyms

Below is a list of acronyms that may be used in discussion of waste disposal facilities. These have been posted on the CMC web site, together with a link to the CalRecycle acronyms page: https://www.calrecycle.ca.gov/lea/acronyms.

Updates will be provided as needed. This list was last revised on September 24, 2025.

Agencies
ACWMA – Alameda County Waste Management Authority
ANSI – American National Standards Institute
ARB or CARB – California Air Resources Board
ASTM – American Society for Testing and Materials
BAAD – Bay Area Air District
CDFW – California Department of Fish and Wildlife (formerly California Department of Fish and Game or CDFG/DFG)
CDRRR – California Department of Resources Recycling and Recovery, or CalRecycle
CIWMB – California Integrated Waste Management Board (predecessor to CDRRR – see above)
CVRWQCB – Central Valley Regional Water Quality Control Board
CMC – Community Monitor Committee
DTSC - Department of Toxic Substances Control
DWR – Department of Water Resources
EMP – Evaluation Monitoring Plan
EPA – United States Environmental Agency
LEA – Local Enforcement Agency (i.e., County Environmental Health)
RWQCB/Water Board – Regional Water Quality Control Board
SWRCB – State Water Resources Control Board

Waste Categories
C&D – construction and demolition
CDI – Construction, demolition and inert debris
FIT – Fine materials delivered to the ALRRF, measured by the ton.
GSET – Green waste and other fine materials originating at the Davis Street Transfer Station, for solidification, externally processed.
GWRGCT – Green waste that is ground on site and used for solidification or cover (discontinued January 2010)
GWSA – Green waste slope amendment (used on outside slopes of the facility)
MSW – Municipal solid waste
RDW – Redirected wastes (received at ALRRF, then sent to another facility)
RGC – Revenue generating cover
TASW – Treated Auto Shredder Waste

Water Quality Terminology
BMP – Best Management Practice – A general term to identify effective means of pollution control, especially in the contexts of stormwater and air quality.
IDL – Instrument Detection Limit – The smallest concentration of a specific chemical, in reagent grade water, that can be detected, with 99% confidence, with the detection instrument (e.g., the mass spectrometer).
MCL – Maximum Contaminant Level – The legal threshold limit on the amount of a substance that is allowed in public water systems under the Safe Drinking Water Act.
MDL – Method Detection Limit – The smallest concentration of a specific chemical, in a sample that contains other non-interfering chemicals, that can be detected by the prescribed method, including preparatory steps such as dilution, filtration, digestion, etc.
NAL – Numeric Action Level – A concentration of a stormwater pollutant above which, the discharger must plan to reduce this concentration.
RL – reporting limit: in groundwater analysis, for a given substance and laboratory, the concentration above which there is a less than 1% likelihood of a false-negative measurement.
SWPPP – Storm Water Pollution Prevention Plan

Substances or Pollutants
ACM – asbestos-containing material
ACW – asbestos-containing waste
ADC – Alternative Daily Cover. For more information:
https://www.calrecycle.ca.gov/lgcentral/basics/adcbasic
BTEX – benzene, toluene, ethylbenzene, and xylene (used in reference to testing for contamination)
CH_4 – methane
CO_2 – carbon dioxide
COD – Chemical Oxygen Demand – A measure of the degree to which a wastewater discharge can deplete the oxygen in a body of water.
DO – dissolved oxygen
HHW – household hazardous waste
LFG – landfill gas
LNG – liquefied natural gas
MEK – methyl ethyl ketone
MIBK – methyl isobutyl ketone
MTBE – methyl tertiary butyl ether, a gasoline additive
NMOC – Non-methane organic compounds
NTU – nephelometric turbidity units, a measure of the cloudiness of water
PFAS – Per- and polyfluoroalkyl substances
TCE - Trichloroethylene
TDS – total dissolved solids
TKN – total Kjeldahl nitrogen
TSS – Total Suspended Solids
VOC – volatile organic compounds

Documents
CCR – California Code of Regulations (includes Title 14 and Title 27)
CDO – Cease and Desist Order
CoIWMP – County Integrated Waste Management Plan
CUP – Conditional Use Permit
JTD – Joint Technical Document (contains detailed descriptions of permitted landfill operations)
MMRP – Mitigation Monitoring and Reporting Program
RDSI – Report of Disposal Site Information
RWD – Report of Waste Discharge
SRRE – Source Reduction and Recycling Element (part of CoIWMP)
SWPPP – Stormwater Pollution Prevention Plan
WDR – Waste Discharge Requirements (Water Board permit)

General Terms
ALRRF – Altamont Landfill and Resource Recovery Facility
ASP – Aerated Static Pile composting, which involves forming a pile of compostable materials and causing air to move through the pile so that the materials decompose aerobically.
AQI – Air Quality Index
BGS – below ground surface
BMP – Best Management Practice
CASP – Covered Aerated Static Pile (ASP) composting
CEQA – California Environmental Quality Act
CERCLA – Comprehensive Environmental Response, Compensation, and Liability Act
CL – Concentration Limit (statistical limit of background concentrations for specific constituents in groundwater monitoring wells)
CQA – Construction Quality Assurance (relates to initial construction, and closure, of landfill Units)
CY – cubic yards
GCL – geosynthetic clay liner

General Terms (continued)
GPS – Global Positioning System
IC engine – Internal combustion engine
LCRS – leachate collection and removal system
LEL – lower explosive limit
LSI – leachate system infrastructure
LMR – Landfill Methane Regulation
mg/L – milligrams per liter, or (approximately) parts per million
NAAQS – National Ambient Air Quality Standards
µg/L – micrograms per liter, or parts per billion
PPE – personal protective equipment
ppm, ppb, ppt – parts per million, parts per billion, parts per trillion
RAC – Reclaimable Anaerobic Composter – a method developed by Waste Management, Inc., to place organic materials in an impervious containment, allow them to decompose anaerobically, and extract methane during this decomposition.
RCRA – Resource Conservation and Recovery Act
SCF – Standard cubic foot, a quantity of gas that would occupy one cubic foot if at a temperature of 60°F and a pressure of one atmosphere
SCFM – standard cubic feet per minute, the rate at which gas flows past a designated point or surface
STLC – Soluble Threshold Limit Concentration, a regulatory limit for the concentrations of certain pollutants in groundwater
TTLC – Total Threshold Limit Concentration, similar to STLC but determined using a different method of analysis.
TPD, TPM, TPY – Tons per day, month, year
WMAC – Waste Management of Alameda County

COMMUNITY MONITOR COMMITTEE
Altamont Landfill Settlement Agreement

Minutes of January 14, 2026

DRAFT

1. Call to Order

The meeting came to order at 4:00 PM.

2. Roll Call

Members Present:	Ben Barrientos, City of Livermore; Donna Cabanne, Sierra Club; Emmanuel Nava, Northern California Recycling Association (NCRA); Ryan Sanchez, Alameda County Department of Environmental Health (LEA); Blaine Harrison, Altamont Landfill and Resource Recovery Facility (ALRRF)
Absent:	Matthew Gaidos, City of Pleasanton; Robert Cooper, Altamont Landowners Against Rural Mismanagement (ALARM)
Staff:	Judy Erlandson, Anna Zamboanga, City of Livermore; Mukta Patil, Grace Stafford and Megan Rollo, Langan/Community Monitor

3. Introductions

All those present introduced themselves.

4. Approval of Minutes of October 8, 2025 meeting

Ms. Cabanne moves to approve the Minutes of October 8, 2025, meeting. Mr. Barrientos seconds and members of the committee present approve the Minutes.

5. Open Forum

No comments.

6. Matters for Consideration

6.1 Election of the Chair

Ms. Cabanne suggests Mr. Gaidos for chair or whomever the City of Pleasanton representative will be. Ms. Erlandson notes that the Settlement Agreement does not

require a chair, however it helps meetings move forward. Ms. Cabanne nominated Mr. Gaidos, City of Pleasanton, as chair. Mr. Nava seconds. The motion passes.

Mr. Barrientos closed item 6.1.

6.2 Responses to Committee Member Questions

Ms. Rollo presented the responses to the committee members' questions from the October 8, 2025, meeting. Mr. Nava asks why GP-20C exists in an area where there is naturally occurring methane detected each sampling period? Ms. Patil responds that there are sporadic detections exceeding the methane criteria, and when corrective actions are applied, the exceedances are resolved and have no required additional mitigation activities. There were no additional comments or questions for this item.

Mr. Barrientos closed item 6.2

6.3 Water Board Requests

Ms. Rollo presented the Water Board Request table. New items added to the table were discussed. Ms. Cabanne asks how often alternative daily cover (ADC) is applied? Mr. Harrison responds and notes that ADC is applied every day to keep exposed waste covered. Ms. Cabanne also requests that the CM follow up on AOC 13 for the next CMC meeting. There were no additional comments or questions on the item.

Mr. Barrientos closed item 6.3.

6.4 Review of Documents on Geotracker

Ms. Rollo presented the Review of Documents on Geotracker. Ms. Cabanne requests a follow-up at the April 8, 2026, meeting regarding ongoing conversations between Waste Management and the CVRWQCB about PG&E disposal at ALRRF.

Mr. Barrientos closed item 6.4.

6.5 PFAS Update

Ms. Stafford presented item 6.5, PFAS Update. Ms. Cabanne requested that the CM continue to track the Dyer Road wells and if and how new PFAS criteria would apply to them and if they would need to be retested. There were no additional questions or comments.

Mr. Barrientos closed item 6.5.

6.6 Reports from the Community Monitor

Ms. Rollo presented item 6.6, Reports from the Community Monitor. Mr. Barrientos asked how long a site visit takes and Ms. Rollo responded that it depends, but generally around two hours. Mr. Barrientos expressed interest in touring the facility and Ms. Erlandson responded that the city and WM can coordinate a visit for the committee. Ms. Cabanne mentioned that one of the site visits describes multiple piles of ADC present, however Mr. Harrison noted earlier in the meeting ADC is applied daily. Mr.

Harrison responded that there is large volume of ADC stockpiled near the active phase of FA 2. Since it is made up of auto-shredder waste, the stockpile remains in place throughout the day. Mr. Nova asks what a high-side trailer is. Mr. Harrison responds that it is a tall trailer meant for construction debris, a bit taller than a typical trailer. Ms. Cabanne requests the CM visit overlapping with an atmospheric river, if possible, to monitor the LSI ponds in FA 1. Mr. Harrison notes that WM will not let LSI ponds overflow, as there is one person whose sole job at WM is to monitor these ponds. There were no additional comments or questions for this item.

Mr. Barrientos closed item 6.6

6.7 Annual Report 2025

Ms. Stafford and Ms. Rollo presented item 6.7, Annual Report 2025. Ms. Cabanne asks how much longer FA 1 will accept material for. Mr. Harrison noted that it is difficult to quantify but possibly two more years - following closure FA 1 will be capped and covered. Ms. Cabanne asks how big the replacement riparian channel is. Mr. Harrison says it is approximately 15 feet wide, but CM noted they will follow up on this item as well. Ms. Cabanne discussed MIN-31 'study of wildlife passage at local over and under crossings' to determine if conduits provide conductivity for wildlife through 580 corridor. She asks when this study will be completed, what are the components and what will the results inform? The CM agreed to follow up on this item. Ms. Cabanne requested WM obtain off-site wetland channel mitigation credits from a site closer to the landfill than the noted Sacramento County location. Ms. Cabanne requested that WM implement some kind of training for the landfill operations staff to properly identify or relocate sensitive species present in the landfill, such as the salamander etc. Mr. Harrison responded that he will look into this. Ms. Cabanne asks if the study completed by Waste Management on potential sources of volatile organic compounds identified in stormwater sampling is available for review. Ms. Rollo noted the question would be raised with Waste Management. Ms. Cabanne asks when it will be known if ALRRF accepted waste from beyond the nine Bay Area counties identified in the settlement agreement. Ms. Rollo notes that it will likely be reported in the 2025 Mitigation Monitoring and Reporting Program (MMRP) to be received in October 2026 or later. Regarding the CM's opinion that an annual Conservation Management Plan (CMP) should be completed to follow up on recommendations in the 2024 CMP, Ms. Cabanne asks how the CMC would request that Waste Management complete a follow up CMP report to close the loop on performance standards that were not met? Ms. Patil responds that CM can prep a memorandum requesting Waste Management complete another annual CMP report. Ms. Cabanne requests a follow up on how Waste Management receives CM's request for a CMP report.

Mr. Gaidos closed item 6.7.

6.8 Meeting Calendar for 2026

Ms. Erlandson presented item 6.8. Mr. Nava called for a motion to approve, Ms. Cabanne seconds and the CMC voted to approve the 2026 meeting calendar.

7. Agenda Building

There were no Agenda Building Items.

Mr. Barrientos closed item 7.

8. Adjournment

The meeting was adjourned around 5:53 p.m. The next meeting will be held on Wednesday April 8, 2026, at 4:00 p.m. at the Livermore Maintenance Services Center at 3500 Robertson Park Road.

LANGAN

135 Main Street San Francisco, CA 94105 T: 415.955.5200 F: 415.955-5201

Memorandum

To: ALRRF Community Monitor Committee

From: Langan – Community Monitor

Date: April 8, 2026

Re: **CMC Meeting of 4/8/2026 - Agenda Item 6.1 - Responses to Committee Members' Questions**

Questions from the January 14, 2026, meeting unless otherwise stated.

AOC 13
There has been no follow up from the CVRWQCB regarding AOC 13.

PG&E Disposal at ALRRF
As of the April 8, 2026, CMC meeting, no new information was available regarding the May 14, 2025, NOV. Discussions between legal counsel for Waste Management and CVRWQCB are ongoing, and the CM will update the CMC as appropriate.

Dyer Road Wells and PFAS
Ms. Cabanne asked for an update on the Dyer Road wells as they relate to updated PFAS regulations. Currently, there are no updates on the Dyer Road wells and PFAS sampling requirements.

Riparian Channel FA2
Ms. Cabanne asked for the width of the Riparian Channel located in Fill Area 2. Waste Management has stated the riparian channel is approximately 15 feet wide.

MIN-31: Study of Wildlife Passage at Local Over- and Under-crossings at I-580 Corridor
Ms. Cabanne asked for a status update regarding MIN-31, the Study of Wildlife Passage at Local Over- and Under- crossing at I-580 Corridor. The Interstate 580 (I-580) Corridor Wildlife Crossing Research Study prepared by McCormick Biological for Kleinfelder on January 22, 2024, evaluated whether existing over- and under-crossings, culverts, and other features near Altamont Pass/ALRRF function as conduits for wildlife movement through the I-580 corridor, consistent with CMP Measure MIN-31. Field methods included motion-activated camera deployments for three 10-day survey periods in 2023 (Summer, Late Fall, and Early Winter; 21, 25, and 30 cameras, respectively) and track plates deployed during Summer 2023. Across all survey periods, the study documented 35 identifiable wildlife taxa; only one special-status species (American badger, a California Species of Special Concern) was detected (two detections near the ALRRF offices during Summer 2023). The study reported no conclusive evidence that wildlife is using man-made crossing infrastructure (culverts, road/rail over- and underpasses) to facilitate north–south movement across the corridor and noted that water in culverts and long culvert lengths/limited line-of-sight may reduce use. In contrast, the Greenville Road Overhead (GREEN) area showed the highest diversity and was identified as the only location with potential evidence of north–south passage across I-580, including detections of larger mammals (e.g., canids) and the only mule deer detections within the study area.

LANGAN

Memorandum

135 Main Street San Francisco, CA 94105 T: 415.955.5200 F: 415.955.5201

To: Community Monitor Committee

From: Langan – Community Monitor

Date: April 8, 2026

Re: **CMC Meeting of 4/8/26 – Agenda Item 6.2 – Central Valley Regional Water Quality Control Board (CVRWQCB) Requests Progress Update**

The Central Valley Regional Water Quality Control Board (CVRWQCB) issued Cease and Desist Order[1] (CDO) R5-2021-001 for the ALRRF on April 22, 2021. In the CDO, the CVRWQCB alleged the ALRRF was being operated outside of applicable federal and state regulations, and the Waste Discharge Requirements (WDRs). The CDO provided a list of various items the Discharger (ALRRF) had performed out of compliance and a time schedule with specific requirements to compel the Discharger to resolve past compliance issues, achieve compliance with Title 27 and the WDRs, and conform to its Notice of Applicability (NOA) in a time frame acceptable to the CVRWQCB.

Table 6.2.2 provides an update of the CVRWQCB requests, including the requirements outlined in the CDO, the expected completion timeline and progress that has been made on each item. Any Areas of Concern (AOCs) or Violations that were included in the previous packets that have been resolved are not included in the updated table.

The Community Monitor will continue to review items on GeoTracker and discuss with WMAC during site visits to provide updates on the work and deliverables requested by the CVRWQCB.

[1] According to California Water Code Section 8701.2 - Cease and desist order, if the Water Board or executive officer determines that any person or public agency has failed to adequately respond to a notice of violation, the board or executive officer may issue an order directing that the person or public agency to whom the notice of violation was issued to cease and desist. A cease and desist order is an order by an administrative agency that requires certain practices specified to stop.

Table 6.2-2
Tracking Table for Water Board Requests
Altamont Landfill Resource and Recovery
Livermore, CA

Task	Due Date	Completed	Comments
Cease and Desist Order (CDO) R5-2021-001			
1.Update the Sampling and Analysis Plan for the interim POC detection monitoring program	~~7/21/2021~~ 4/4/2022	Yes, revised plan submitted on 4/4/22	
2. Revise the background water quality values and update the concentration limits (CLs)	4/21/2022	Yes, submitted on 5/13/22	
3. Install groundwater monitoring wells (interim and final) for FA2			
(a) Work plan to install the groundwater monitoring wells (interim and final) for FA2	7/21/2021	Yes, submitted on 7/20/21	
(b) Install Interim POC Wells	Ongoing	Ongoing	
(c) Report installation within 60 days of installing any new groundwater monitoring well or soil gas monitoring well.	Ongoing	Ongoing	
(d) Install Final Permanent FA2 limit wells	2021 and 2022	Yes, installation report submitted on 12/2/2021	
(e) Report installation within 60 days of installing any new groundwater monitoring well or soil gas monitoring well.	Ongoing	Ongoing	Monitoring well installations have been reported within schedule.
(f) Implementation of a Water Quality Monitoring and Response Program for FA2 Unit 1		Yes, completed with the SAP revisions and new monitoring well network.	
4. Install soil gas monitoring wells (interim and final) for FA1 and FA2			
(a) Work plan to install the soil gas monitoring wells (interim and final) for FA1 and FA2	7/21/2021	Yes, submitted on 8/3/2021	
(b) Install Interim Monitoring Wells FA1	Week of May 31, 2021	Yes, submitted on 7/20/21	
(c) Install Interim Monitoring Wells FA2	9/21-10/21; 2021-2025	Ongoing	Same schedule as item 3(b).
(d) Report installation within 60 days of installing any new groundwater monitoring well or soil gas monitoring well.	Ongoing	Ongoing	Monitoring well installations have been reported within schedule.
(e) Install Final Monitoring Wells		Yes, installation report submitted on 12/2/2021	
5. Surface Water Monitoring Plan to conduct surface water monitoring for surface water flowing out of FA2	7/21/2021	Yes, submitted on 7/16/21	
(a) Surface Water Monitoring		Yes, Second Semiannual 2021 results submitted on 2/1/22	
6. Document the results of the MW-4A evaluation monitoring program (including groundwater and soil gas sampling) in separate corrective action status reports to be submitted semi-annually	8/1/2021	Yes, second report submitted on 2/1/22	
7. Groundwater and soil gas monitoring network along the northern and eastern limits of FA1			
(a) Work plan to install the groundwater and soil gas monitoring network along the northern and eastern limits of FA1	6/21/2021	Yes, submitted 5/10/2021; approved 5/19/2021	
(b) Install groundwater and soil gas monitoring network along northern and eastern limits of FA1	Week of May 31, 2021	Yes, submitted on 8/3/2021	

Table 6.2-2
Tracking Table for Water Board Requests
Altamont Landfill Resource and Recovery
Livermore, CA

Task	Due Date	Completed	Comments
8. Update corrective action financial assurance cost estimates for FA1 and FA2	~~7/21/2021~~ 3/1/2022	Yes, submitted 2/25/2022	Revised cost estimates were approved by the CVRWQCB on 4/21/2022.
9. Report outlining the LFG extraction wells operations as part of the Corrective Action Program to address the LFG impacts outside the limits of FA1	5/22/2021	Yes, submitted 5/21/2021	
10. Submit a Report of Waste Discharge to install off-waste liquid solidification basins	10/19/2021	Yes, submitted 10/19/2021	
11. Report Installation and operation of new off-waste footprint solidification basins	After completion of installation	Ongoing	
12. Notify the CVRWQCB 30 days prior to removal of interim monitoring devices	Ongoing during Fill Area 2 expansion	Ongoing	
WDRs Order R5-2016-0042-01, Amending Order R5-2017-0026			
1. Prepare and submit a preliminary description of the Toe Berm, including the proposed "soil conditioning," for Staff review.	1/24/2025	Completed	
2. An updated description of subsequent proposed Phase construction schedule, if not otherwise noted in the JTD/ROWD	1/24/2025	Completed	
3. Submit a report of the results of review of circumstances regarding drums observed in exisiting solidification basins atop FA1, including respective contents.	1/9/2025	Completed	
4. Submit workplan for required decomissioning of the existing solidification basins atop FA1.	~~6/2/2025~~ 10/30/2025	Completed, pending submittal to Geotracker	CVRWQCB 2 September 2025 letter commented on the 19 June 2025 subject work plan.
5. As a part of FA2 Ph. 8 cell construction, CVRWQCB is requiring additional information - Submittal of a report regarding observed discharge of apparent cardboard boxes, wooden pallets, and other possible dunnage to the existing soldification basins atop FA1, including their respective contents.	12/15/2025	Completed, pending submittal to Geotracker	
Violations or Areas of Concern (AOCs)			
1. To address the violations issued by the CVRWQCB on June 10, 2024, the discharger shall:			
(a) Ensure leachate returned to FA1/Unit 2 for dust control is applied at the minimum amount necessary for dust control.	Immediately	Completed	
(b) Submit a proposal and timeline to install containment system for the leachate collected at Seep B and C collection point to prevent discharge and ponding of leachate atop FA1/Unit 1.	7/30/2024	Completed	
(c) Document the removal of ponded leachate and leachate stained/impacted daily or intermediate cover soil from atop FA1/Unit 1 and FA2/Unit 2, as well as soil replacement, with clean soil, and regrading to ensure adequate cover thickness and drainage.	7/30/2024	Completed	

Table 6.2-2
Tracking Table for Water Board Requests
Altamont Landfill Resource and Recovery
Livermore, CA

Task	Due Date	Completed	Comments
(e) Ensure daily cover is applied across all waste at least every 6.5 days	Continuous	Completed and ongoing	Active implementation - WM has implemented a more frequent application of daily cover and conducted a retraining session for onsite management focusing on application of intermediate cover.
2. Per the June 10, 2024 NOV, notify the CVRWQCB of progress made on the AOCs listed below:			
(a) AOC 1 - Repair broken LFG extraction line observed atop LF1/Unit 1 and provide documentation	As soon as repair is complete	Completed	LFG extraction line observed was an abandoned lateral line, and part of older decomissioned system. Line was cut, capped and covered.
(b) AOC 2 - All liquids, including tank washout, discharged into the Facility's solidification basins, must be discharged directly into the defined limits of each basin	Continuous	Completed and ongoing	ALRRF will ensure that all liquids, including tank wash out, discharged into the facilities solidification basins, are directed exclusively into the defined limits of each basin.
(c) AOC 3 - Enhance windblown litter controls and clean up. Reduce the size of the open disposal face and the application of daily cover over waste more frequently than every 6.5 days as a best management practice and improved housekeeping.	Continuous	Completed and ongoing	Active implementation - WM has implemented a more frequent application of daily cover and conducted a retraining session for onsite management focusing on application of intermediate cover.
(d) AOC 4 - Submit report documenting cleanup from leaking LSI-3 pump. Include proposal and timeline to install secondary containment for the LSI-3 leachate pump transfer line.	8/1/2024	Completed	
(e) AOC 5-12 - These AOCs may be considered as winterization work. Repair as practical.	10/31/2024, final report due 11/14/2024	Completed	
(f) AOC 13 - CVRWQCB has reached out to Storm Water Unit and requested they inspect and evaluate facility for compliance with the industrial general permit good housekeeping best management practice requirements.	Pending	Pending	CVRWQCB Storm Unit has inspected facility but no formal recognition of AOC 13 on Geotracker at this time.
3. To address the violations issued by the CVRWQCB on August 5, 2024, the discharger shall:			
(a) Isolate, remove, and properly contain the hazardous waste and arrange for its disposal at a permitted facility authorized to accept hazardous waste.	Immediately	Completed	
(b) Submit a report documenting the offsite disposal of the hazardous waste at a permitted facility authorized to accept hazardous waste.	10/1/2024	Completed	
Per the May 14, 2025, NOV, notify the CVRWQCB of progress made on the NOVs listed below:			

Table 6.2-2
Tracking Table for Water Board Requests
Altamont Landfill Resource and Recovery
Livermore, CA

Task	Due Date	Completed	Comments
(a) Isolate, remove, and properly contain the hazardous waste and arrange for its disposal at a permitted facility authorized to accept hazardous waste.	Immediately	In Progress	Waste Management and CVRWQCB are in correspondence regarding the matter.
(b) Submit a report documenting the offsite disposal of the hazardous waste at a permitted facility authorized to accept hazardous waste.	7/31/2025	In Progress	Waste Management and CVRWQCB are in correspondence regarding the matter.
Per the May 27, 2025, NOV, notify the CVRWQCB on the progress made on the NOVs listed below:			
(a) Implement procedures to prevent future discharges of waste outside the completed, lined extent of FA2.	Immediately	Completed and ongoing	
(b) Submit a report with photographic evidence demonstrating that all waste documented in the attached Inspection Report observed outside the completed, lined limits of FA2 has been removed and property disposed.	7/30/2025	Completed - pending submittal on Geotracker	
Additionally, included in the Inspection Report from May 27, 2025, the CVRWQCB is requiring resolutions to the following AOCs, listed below, with the submittal of a report with photographic evidence, documenting that each of the documented AOCs have been addressed:			
(1) Two leachate-stained soil seeps were observed along the southern face of LF-1/Unit-1 in the area of Seep C	8/30/2025	Completed	
(2) Leachate-stained soil and some liquid was visible beneath the Seep B and Seep C leachate collection tanks.	8/30/2025	Completed	
(3) CVRWQCB observed truck potentially emptying load in a location that would have been outside the discharge limits of the Yellow Flag Basin	8/30/2025	Completed	
(4) A low area of possible settlement was observed atop FA1, just east of the J-stand, which could lead to significant ponding.	8/30/2025	Completed	
(5) A single area of leachate-stained soil was observed atop FA1 just southwest of the J-stand.	8/30/2025	Completed	

Table 6.2-2
Tracking Table for Water Board Requests
Altamont Landfill Resource and Recovery
Livermore, CA

Task	Due Date	Completed	Comments
(6) A couple areas of notable erosion were observed atop FA1.	8/30/2025	Completed	
(7) Tire ruts and ponding were observed atop FA1 adjacent to the TASW stockpile.	8/30/2025	Completed	
(8) A few areas of exposed waste, without adequate daily/intermediate cover were observed atop FA1.	8/30/2025	Completed	
(9) Erosion or settlement occurred beneath the well apron for GP-24. Assess the condition of GP-24 and submit a report that contains a proposal to repair the well.	7/30/2025	Completed	
(10) Well MW-10 has been damaged and will need to be repaired and possibly replaced. Assess the condition of MW-10 and submit a report that contains a proposal to repair the well.	7/30/2025	Completed	
(11) A large stockpile of soil has been temporarily placed within SB-H.	9/1/2025	Completed	

Notes:

POC - Point of Compliance
FA - Fill Area
LFG - Landfill Gas
CVRWQCB - Central Valley Regional Water Quality Control Board
WMAC - Waste Management of Alameda County
TBD - To Be Determined. These deadlines depend on activities which have not yet been completed.
Gray shaded cells denote items that have been completed and no longer tracked. Items remain in the table for reference.

LANGAN

135 Main Street San Francisco, CA 94105 T: 415.925.5200 F: 415.955.5201

Memorandum

To: ALRRF Community Monitor Committee

From: Langan – Community Monitor

Date: April 8, 2026

Re: **CMC Meeting of 4/8/2026 – Agenda Item 6.3 – Review of Documents on Geotracker Web Site**

This is the abridged version of this memorandum. It is limited to new items reported in Geotracker since the previous Community Monitor Committee packet for the July 2025 meeting was completed, plus any prior items that provide useful background information for the new items. The complete, current version of this Review of Documents is located on the Community Monitor Committee website and can be accessed using this link[1].

In this memo, each topic is given its own table where relevant documents are summarized in chronological order. For ease of reference, the topics are grouped under major headings, and in the electronic version of this memo, links enable the reader to skip to a topic of interest and return to the top of the list when finished.

In the list, those topics that include a recent important development or Violation are marked with a special bullet:

- This topic links to a list of documents that contains a recent violation or important development.

Summaries of the documents added since the previous Community Monitor Committee meeting are indicated with a heavy black border. They largely consist of Waste Management of Alameda County (WMAC) responses to Central Valley Regional Water Quality Control Board (CVRWQCB) requests and notices, as well as design reports and reports describing specific incidents.

Violations and important areas of concern are highlighted in pink and yellow, respectively. Other noteworthy new items are highlighted in green. The topic list begins on the following page. When a single document addresses multiple topics, its summary is placed under the most general category available, which is often the first topic, Landfill Operations.

For reference the Geotracker webpage for the ALRRF is accessible here: https://geotracker.waterboards.ca.gov/profile_report?global_id=L10005834311.

1 https://altamontcmc.org/agendas-etc-2020-2023

MEMO

Topic List

Landfill Operations

- Revised Configuration and Phasing Schedule for FA2

Monitoring Wells

- New or Pending Monitoring Wells

Other Topics

- CVRWQCB Inspections

MEMO

LANDFILL OPERATIONS

Revised Configuration and Phasing Schedule for FA2 Topics

	From	Format | Date	Key Point(s)
1	WM	December 17, 2025	Waste Management has provided the CVRWQCB with the Design Report, Filla Area 2, Leachate Storage Impoundment (LSI) 4 Construction (Design Report) prepared by Geosyntec Consultants. This report outlines design details and supporting backup information for the new LSI-4 to manage leachate generated in FA2. LSI-4 will have approximately 4.02 million gallon of capacity. The report has been prepared with the site's WDR and Title 27 California Code of Regulations.

MONITORING WELLS

New or Pending Monitoring Wells Topics

	From	Format | Date	Key Point(s)
2	Department of Water Resources	December 5, 2025	The Department of Water Resources, Division of Dams (DSOD), has provided WM with a response to the letter dated April 24, 2025, in which WM requests jurisdictional determination regarding proposed FA2 Toe Berm. The letter also includes the design and proposed phased construction of the Toe Berm. Additionally, DSOD reviewed the Joint Technical Document for ALRRF. The DSOD determined that the proposed embankment impounds compacted solid waste will have no water storage capacity and therefore does not meet the definition of a dam or reservoir pursuant to sections 6002 and 6003 of California Water code. DSOD states that no alteration of the embankment for the purpose of storing water of more than 15 acre-feet may be made in the future without DSOD approval and as long as the water storage capacity does not exceed 15 acre-feet, the FA2 Toe Berm is not subject to State jurisdiction as to safety and no further action will be required of WM or taken by DSOD.

OTHER TOPICS

CVRWQCB Inspections Topics

	From	Format | Date	Key Point(s)
3	CVRWQCB	NOV| May 14, 2025	The CVRWQCB has issued a Notice of Violation for the discharge of hazardous waste in violation of WDR requirements. In an April 22, 2025 email, Waste Management notified the CVRWQCB staff of the possible disposal of non-RCRA hazardous waste at ALRRF. "The waste originated from

MEMO

	From	Format | Date	Key Point(s)
			a PG&E power pole replacement project occurring adjacent to the Potrero MGP Northern Switchyard in San Francisco. Instead of placing onsite spoils in the bin provided for the project, the hydrovac conductor (Discovery Hydro) transported the wet spoils to the PG&E Oakport spoils yard and dumped approximately 200-gallons of untested wet spoils into a non-hazardous wet spoils bin on March 11, 2025. Once at the spoils yard, excess free liquid was decanted, and the remaining sludge was sent to Altamont Landfill." The STLCs detected for chromium and nickel were 12.5 mg/L and 83 mg/L, respectively, both exceeding the California Hazardous Waste levels for these constituents, which are 5 mg/L and 20 mg/L, respectively. The CVRWQCB is requiring the landfill to immediately isolate, remove and properly contain the hazardous waste, and arrange for its disposal at a permitted facility authorized to accept hazardous waste. The CVRWQCB is also requiring the landfill to submit a report documenting the offsite disposal of hazardous waste at a permitted facility authorized to accept hazardous waste by July 31, 2025.

LANGAN

135 Main Street San Francisco, CA 94105 T: 415.955.5200 F: 415.955.5201

Memorandum

To: Community Monitor Committee

From: Langan – Community Monitor

Date: April 8, 2026

Re: **CMC Meeting of 4/8/26 – Agenda Item 6.4.1 – Review of Reports Provided by ALRRF: Air Emission Report**

Air Emissions Report

The most recent Semi-Annual Report to the Bay Area Air Quality Management District (BAAQMD) covers the period from June 1, 2025, through November 30, 2025. The key points from this document are:

- New gas wells brought online – During the reporting period, four new landfill gas extraction wells were brought online.

- High temperature wells – During the reporting period, one well showed high temperatures (131 Fahrenheit [F] or higher). All exceedances were corrected within 120-days.

- Recent gas well decommissions – During the reporting period, a total of one existing well was decommissioned, i.e., shut down and disconnected from the gas extraction system because they had become unproductive.

- Surface emissions monitoring – For the third quarter of 2025, surface emissions monitoring took place on July 29, August 15 and 26 and September 29 of 2025; for the fourth quarter of 2025, monitoring took place on October 30 and November 11 of 2025. During the third quarter of 2025, there were 26 exceedances of the 500 parts per million by volume (ppmv) methane threshold. All the corrective actions to block these emissions were successful and passed their 10-day and 30-day follow-up tests. During the fourth quarter of 2025, there were 28 exceedances of the 500 parts per million by volume (ppmv) methane threshold. All of the corrective actions to block these emissions were successful and passed their 10-day and 30-day follow-up tests.

- Emission Control Device Source Tests – Currently the operating emission control devices for landfill gas at the ALRRF consist of two turbines (S-6 and S-7) and two flares (A-15 and A-16). The two turbines were tested for compliance with emission limits in November 2024, while flare A-15 was tested in February and A-16 was tested in March 2025, within the 60 days of the test date. All three devices passed by the BAAQMD Permit 8-34-301.4 and Condition Number 18773.

- Gas Migration at Perimeter Probes – In this reporting period, methane exceeding regulatory threshold of 5% was found in none of the 50 perimeter probes installed around

Fill Areas 1 and 2, except for Probes GP-20C and GP-8C. Probe GP-20C and probe GP-8C, both have historically had higher methane values that have been proven to be naturally occurring and not related to landfill operations.

- Gas Migration Near Groundwater Monitoring Wells – Throughout this monitoring period, the landfill gas wells nearest to groundwater monitoring wells E-05/E-07, E-20B, and MW-4A continued to be operated with as much vacuum as they would tolerate without pulling in air from above the ground surface. This was an effort to prevent landfill gas from reaching those groundwater wells, where low concentrations of VOCs have been detected.

LANGAN

135 Main Street San Francisco, CA 94105 T: 415.955.5200 F: 415.955.5201

Memorandum

TO: Community Monitor Committee

FROM: Langan – Community Monitor

DATE: April 8, 2026

SUBJECT: **CMC Meeting of 4/8/26 – Agenda Item 6.4.2 – Review of Reports from ALRRF: Groundwater Analysis Progress Report #36**
Langan Project No. 750657607

Langan CA, Inc. (Langan) reviewed hydrogeologic data for the Altamont Landfill and Resource Recovery Facility (ALRRF) located near Livermore, California. SCS Engineers collected data at ALRRF and presented it in the following reports:

- SCS Engineers, Second Semiannual 2025 Groundwater Monitoring Report, Altamont Landfill and Resource Recovery Facility (WDR Order No. R5-2016-0042-01), Livermore, California, dated February 2026.

- SCS Engineers Second Semiannual 2025 Corrective Action Status Report, Altamont Landfill and Resource Recovery Facility (Order No. R5-2021-0022), Livermore, California, dated February 2026.

The reports address the monitoring and reporting requirements of the Central Valley Regional Water Quality Control Board (CVRWQCB) Waste Discharge Requirements (WDR) Order No. R5-2016-0042 and the related Monitoring and Reporting Program (MRP), adopted on October 27, 2016 for the ALRRF, which is owned and operated by Waste Management of Alameda County, Inc. (WMAC), and Cease and Desist Order (CDO) No. R5-2021-0020, adopted on April 22, 2021. This memorandum describes the results of the above reports and provides Langan's opinions and recommendations for the Community Monitor Committee (CMC). The report was reviewed for issues described in previous CMC meeting minutes, to address provisions stated in the CDO adopted in 2021, and for potential trends in groundwater analytical data over recent years.

The Second Semiannual groundwater sampling activities for Fill Area 1 (FA1) and 2 (FA2) were conducted from July through December 2025. Perimeter monitoring wells MW-47B, MW-49AR and MW-49BR and future solidification basin monitoring wells MW-64, MW-65 and MW-66 were sampled quarterly or more often for background data collection purposes. MW-42B was checked quarterly but did not contain sufficient liquid to be sampled. Perimeter monitoring wells that have been sampled for eight quarterly events have had their sampling frequency changed to semiannual per WDR requirements.

LABORATORY QA/QC

During the Second Semiannual 2025 monitoring event, there were similar QA/QC issues as the First Semiannual 2025 monitoring event.

The QA/QC samples included surrogate recovery, matrix spikes/matrix spike duplicates (MS/MSD), laboratory control samples (LCSs) and instrument calibration. Matrix spikes and surrogate recovery are evaluated to determine whether the sample matrix is interfering with the laboratory analysis, and to provide a measure of the accuracy of analytical data. Laboratory control samples are samples with known concentrations of analytes of interest that are prepared and analyzed with site groundwater samples.

Some QA/QC LCS/LCSD (laboratory control sample duplicate) and MS/MSD data associated with the Second Semiannual 2025 groundwater samples were outside of acceptable laboratory control limits, however, overall evaluation of the QA/QC protocols indicates the laboratory results are valid and suitable for use. Data is considered acceptable for intended use.

MONITORING WELL NETWORK

The 2016 MRP identifies two sets of corrective action groundwater monitoring wells: 1) E-20B along the east side of FA1 and downgradient (detection) well MW-27 (this well replaced well MW-12), and 2) wells E-05 (now replacement well E-05R[1]) and E-07 in the main canyon south of FA1 and their downgradient (detection) wells E-03A and E-23. Additional detection wells have been added to the MRP, due to indications of possible groundwater impacts at other locations at ALRRF. Table 6.4-1 (below) summarizes the monitoring well network, which is also presented in Figure 6.4-5. In addition, landfill gas extraction is the corrective action ongoing in the vicinity of monitoring wells MW-4A and MW-38.

Table 6.4-1

FA1	
Detection Monitoring Groundwater Monitoring Wells	MW-3B
Corrective Action Program Groundwater Monitoring Wells	E-03A, E-05R, E-07, E-20B, E-23, MW-20R, MW-27
Evaluation Groundwater Monitoring Wells	MW-1A, MW-2A, MW-3B, MW-4A, MW-5A, MW-6, MW-7, MW-31
Class II Surface Impoundment "FA1 South LSI" Evaluation Monitoring Groundwater Well	MW-11
Point of Compliance (POC) (or Final Edge of Waste) Monitoring Wells	MW-37, MW-38, MW-39, MW-40
Evaluation Groundwater Monitoring Well for MW-38	MW-53R
FA2	
Detection Monitoring Groundwater Monitoring Wells	MW-9, MW-10, MW-19, PC-6B, PC-6B[R], WM-2, PC-2A, PC-2C
Class II Surface Impoundment (LSI-3) Detection Groundwater Monitoring Wells (listed in MRP as SI-1)	MW-8A, MW-8B, MW-15A, MW-15B, MW-16, MW-17, MW-17R, MW-18
Interim Phase 6 Groundwater Monitoring Wells	MW-58, MW-61, MW-62, MW-63

[1] Wells with an "R" after their number are replacement wells, installed because the original well became dry.

Point of Compliance (POC) (or Final Edge of Waste) Monitoring Wells	MW-41A, MW-41B, MW-42A, MW-42B, MW-43, MW-47A, MW-47B, MW-49AR, MW-49BR, MW-50, MW-51, MW-52

SECOND SEMIANNUAL 2025 GROUNDWATER SAMPLING RESULTS

Prior to the start of the Second Semiannual 2025 sampling period, groundwater monitoring wells have been sampled eight or more times and will continue to the monitored on a semiannual basis per WDR requirements except for wells MW-42B, MW-47B, MW-49AR and MW-49BR. Well MW-42B was dry during both Third and Fourth Quarters of 2025, due to small water volume and slow recharge. A grab sample was collected from Well MW-47B to analyze for background parameters. Sampling of MW-42B and MW-47B will continue on a quarterly basis until the wells have been sampled at least eight times. Quarterly sampling attempts at MW-42B and MW-47B will continue on quarterly or more frequent basis until these wells have been sampled at least eight times.

Fill Area 1

Monitoring parameter concentration limits have been established for FA1 wells. The concentration limits for these wells were established using intra-well statistical methods and are used to determine potentially measurably significant changes in water quality.

E-05R and E-07

Low concentrations of VOCs were detected in groundwater below the FA1 Unit 1 landfill toe in 1982. Monitoring wells E-05 and E-07 were installed near the toe in 1985 to provide groundwater data. E-05 was abandoned in May of 2023 and today, E-05R and E-07 are the Point of Compliance wells in this area. VOCs have significantly decreased over time.

During the Second Semiannual 2025 period, in well E-05R there was a detection of tetrahydrofuran above the reporting limit. Additionally, there were detections of diethyl ether and tert-butyl alcohol. However, these detections are estimated because they are below reporting limits but above method detection limits. These detections are consistent with recent samples from E-05R as well as historical data from the original well E-05.

In E-07, 1,1-DCA and dichlorofluoromethane were detected above reporting limits during this period at concentrations of 1.4 µg/L and 4.2 µg/L respectively. Trace concentrations of cis-1,2-dichloroethene, tetrahydrofuran, diethyl ether, tetrachloroethene and trichloroethene were reported.

No VOCs were detected in well E-23 (downgradient of E-05R and E-07) and no methane was detected with the associated gas probe (AL6).

MW-38

Monitoring well MW-38 is the only FA1 point of compliance well that is sampled semi-annually. It is located on the east side of FA1.

During the initial sampling event of MW-38, conducted late April 2022, one VOC was detected in groundwater. A Proposed Evaluation Monitoring Plan (EMP)[2], Engineering Feasibility Study (EFS)[3], and initial and revised Amended Report of Waste Discharge (AROWD[4]) were submitted to the CVRWQCB (Geosyntec, February 2, 2022; May 9, 2022, and May 13, 2022). It was concluded that the VOC concentrations in groundwater at MW-38 were due to LFG effects. On February 15, 2022, the CVRWQCB indicated that the monitoring of water quality in the MW-38 area (including at the time newly installed downgradient well MW-53) should be included in the CDO status report for the corrective action areas. In a CVRWQCB letter dated December 13, 2022, the CVRWQCB provided comments to the May 13, 2022 AROWD and requested an additionally amended AROWD be submitted by March 31, 2023. WMAC has incorporated MW-39, vadose point UGP-4 (near MW-39), and data from LFG wells 843, 844 and 703 into the Corrective Action Status Report (SCS, 2024), based on additions to the May 2023 AROWD and requests made by the CVRWQCB in their June 6, 2023, letter. New additional well MW-53R and nearby gas probe UGP-16R replaced MW-53 and UGP-16 because they were abandoned in June 2024 for construction of FA2 Phase 7.

During the Second Semiannual 2025 sampling event, groundwater results for MW-38 show detections of 1,1-dichloroethane and dichlorodifluoromethane. These detections are estimated as the concentrations are below their reporting limits and above their method detection limits. These concentrations are the lowest observed since well installation in 2021.

<u>E-20B and downgradient wells [MW-27, E-20R]</u>

E-20B is located east of FA1. Groundwater monitoring data collected over the past several years have shown continuing decrease in the concentrations of VOCs at this well. In monitoring well E-20B, 1,1-dichloroethane and dichlorofluoromethane were detected at concentrations above the reporting limit. These VOCs have been detected in E-20B since 1999.

During the Second Semiannual 2025 sampling event, tert-butyl alcohol was detected above reporting limits at 200 µg/L. Four VOCs were also detected in E-20B at trace concentrations, 1,1-DCA, dichlorodifluoromethane, diethyl ether and tetrahydrofuran. These VOCs were detected at concentrations at the lower end of their historical ranges in E-20B.

In downgradient well MW-20R, tert-butyl alcohol was detected below the reporting limit.

No VOCs were detected in MW-27.

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[2] *Geosyntec Consultants, February 2, 2022. Amended Report of Waste Discharge and Proposed Evaluation Monitoring Plan for MW-38, Altamont Landfill and Resource Recovery Facility, Alameda County, California*

[3] *Geosyntec Consultants, May 2, 2022; Revised May 9, 2022. Engineering and Feasibility Study for MW-38 Area, Altamont Landfill and Resource Recovery Facility, Alameda County, California*

[4] *Geosyntec Consultants, May 13, 2022. Amended Report of Waste Discharge for MW-38 Area, Altamont Landfill and Resource Recovery Facility, Alameda County, California*

The groundwater data collected during this reporting period indicates that LFG extraction continues to be effective in addressing gas effects at well E-20B, as VOC concentrations at E-20B have decreased over time.

MW-4A

MW-4A is located north of FA1. Initial indications of measurably significant results for bicarbonate alkalinity and dissolved calcium, and the detection of five VOCs, cis-1,2-dichloroethene, 1,1-dichloroethane, MTBE, dichlorofluoromethane and trichloroethene, were recognized from the groundwater sampling data conducted in 2017. Resampling of MW-4A confirmed the statistical exceedance of potential LFG indicator parameter bicarbonate alkalinity, pointing to the influence of LFG. This well has continued to be sampled since this monitoring event.

During the Second Semiannual 2025 sampling event, no VOCs were detected in MW-4A or associated monitoring wells, except one below reporting limit detection of carbon disulfide in MW-4A. Carbon disulfide is not considered an indicator of influence of LFG and according to SCS, likely a laboratory cross-contaminant and/or naturally occurring.

The groundwater data collected during this reporting period indicated that the LFG extraction continues to be effective in addressing gas effects at well MW-4A. No LFG-related VOCs have been detected at MW-4A since the third quarter of 2019. The concentrations of bicarbonate alkalinity have fluctuated from slightly below to slightly above the statistical concentration limit. Bicarbonate alkalinity and dissolved calcium was detected in MW-4A at concentrations below the statistical limit. Additionally, total Kjeldahl nitrogen (TKN) concentrations were detected below the reporting limit but above the statistical limit. This does not appear to be related to impacts from LFG or leachate, as this was an estimated concentration and because MW-4A is a corrective action well, no further resampling was recommended.

Fill Area 2

Wells associated with FA2 were evaluated with the same statistical protocols used for FA1 wells as mentioned above. A summary of VOCs detected in FA2 is presented in Table 6.4-2 attached at the end of the memo, however, there were no detections of VOCs in FA2 during the Second Semiannual 2025 sampling period.

Except for concentrations above the reporting limit of tetrahydrofuran in detection monitoring well MW-10 and trace concentrations (below the reporting limit) of acetone in point of compliance monitoring well MW-49AR, no VOCs were detected in samples from Fill Area 2 detection monitoring wells or POC wells, MW-8A, MW-8B, MW-9, MW15B, MW-16, MW-17, MW-17R, MW-18, MW-19, MW-27, MW-41A, MW-42A, MW-43, MW-47A, MW-47B, MW-49A, MW-49BR, MW-50, MW-51, MW-52, PC-6B(R), WM-2, PC-2A, and PC-2C.

A solidification basin facility is being constructed north of FA2. Groundwater wells associated with this facility are being sampled. Wells being monitored for future detection monitoring of the solidification basin facility are MW-60, MW-64, MW-65 and MW-66. During the First Semiannual 2025 sampling event, these wells were first sampled in January of 2025 and two additional times for background purposes. A below reporting limit concentration of tert-butyl alcohol was detected in the first sample of MW-66. Two subsequent samples had no VOC detections. Additionally,

acetone, carbon disulfide and toluene were detected in MW-65. After resampling, toluene was detected below reporting limit concentrations in this well. WM notified CVRWQCB by email on March 20, 2025, of January 2025 VOC detections in MW-65 and that additional sampling would be conducted. During the Second Semiannual 2025 sampling event, MW-60 was sampled in November 2025, and MW-64, MW-65 and MW-66 were sampled five times throughout 2025 for background database collection purposes. No VOCs were detected in the samples from MW-60, MW-64 and MW-66. In MW-65, toluene was detected at concentrations above the reporting limit in one sample out of five collected. Additionally, acetone and carbon disulfide were detected below the reporting limit in one sample out of five collected, however, an additional vial was analyzed for VOCs and no VOCs were detected. Toluene had been the only VOC detected more than once, and over time concentrations had decreased to below reporting limits as well as undetected in the most recent samples. Acetone has been identified as a common laboratory and field containment, and carbon disulfide has been found to be naturally occurring in deeper wells south of FA2. Throughout 2025, there were no industrial activities documented near or upgradient of MW-65. SCS reports that the presence of low VOCs is likely attributed to field cross contamination or laboratory cross contamination. Continued routine sampling is recommended.

During the Second Semiannual 2025 monitoring event, except for interim wells MW-61 and MW-63, there were no initial concentration limit exceedances identified for the inorganic monitoring parameter sample data for Fill Area 2 wells. The CVRWQCB was notified of initial exceedances for chloride in MW-61 and bicarbonate alkalinity in MW-63 and of pending resampling. MW-63 is already being sampled on a quarterly basis in accordance with the CDO due to a recurring statistical exceedance for chloride and will continue until its destruction planned for mid-2026.

Reoccurring statistical exceedances observed in the Second Semiannual 2025 period include, MW-8B (chloride), PC-2A (dissolved calcium, chloride, TDS), WM-2 (dissolved calcium), MW-62 (chloride and TDS) and MW-63 (chloride). PC-2A (along with MW-8A and MW-8B) is a part of a group of wells that have experienced changes in inorganic groundwater chemistry starting as early as 2018. An evaluation of potential sources of the water quality changes was conducted for these wells, which determined the changes were due to storm water effects and not release from the landfill (Geosyntec, 2020). WMAC has continued to report water quality data for all three wells in accordance with the 2016 WDR/MRP. For WM-2, the report Assessment of Inorganic Water Quality Changes in WM-2 dated June 11, 2021, concluded that water quality changes that had been noted did not appear to be associated with Fill Area 2 landfilling activities. Since 2019, significant amounts of earthwork have been conducted in the area north of WM-2 and therefore has altered the topography allowing for a depression where storm water may accumulate. These changes have appeared to alter natural groundwater recharge patterns which has resulted in inorganic water quality changes. WM has continued to monitor and report water quality data in WM-2. Lastly, MW-62 and MW-63 are interim wells for Phase 6 of Fill Area 2 and will be decommissioned in 2026 to accommodate construction of future cells. Quarterly samples have been collected from both wells since the First Semiannual 2024 sampling event.

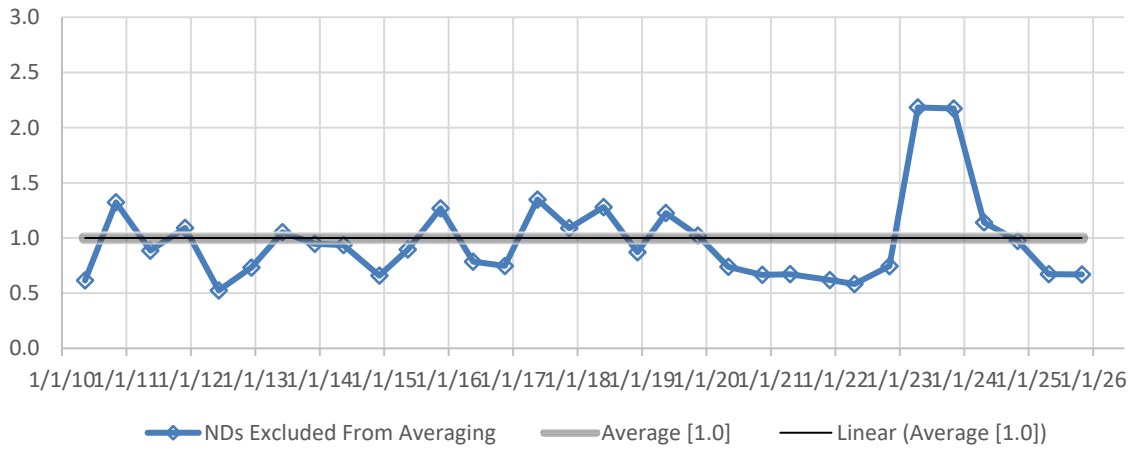
Trends in VOC Data

The Community Monitor reviewed the trends in data from monitoring wells where VOCs have been detected and continued graphing the data over time for each detected contaminant in each well. We have normalized the concentration data (dividing each data point by the average for that

substance at that well, with non-detects excluded) to pool all of the VOC data at a well and look for trends. We offer the following updated observations well-by-well, and the general observation that for most of these wells normalized concentration trends were close to, at, or below the average (i.e., 1.0), with the exception of MW-4A for which VOCs were not detected.

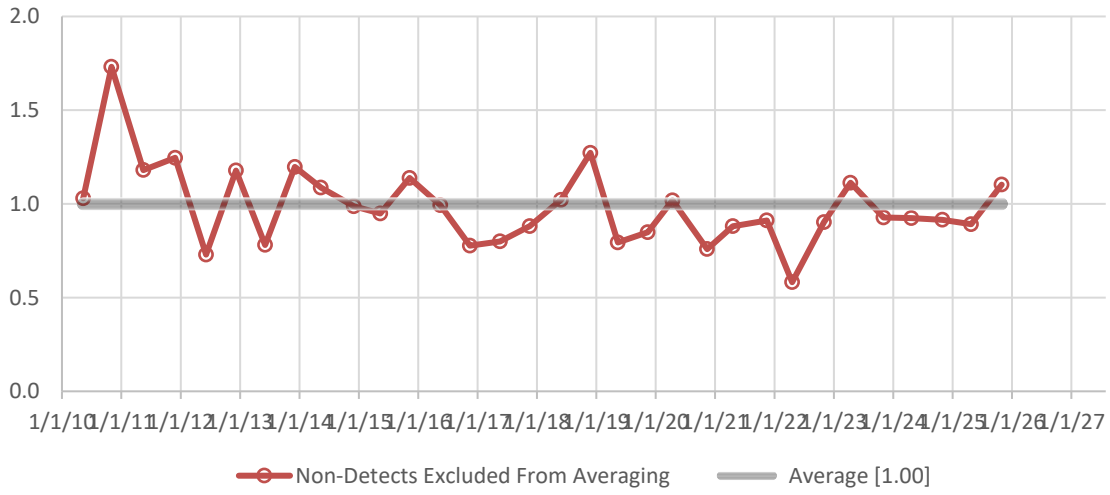
At Well E-05R at the toe of FA1, the data has shown (Figure 6.4-1) below average concentrations since May 2020. The April 2023 sample showed a sharp increase in total VOC concentration. This is primarily due to an increase in tert-butyl alcohol concentration, with respect to the previous sampling events. Tert-butyl alcohol is a degradation product of MTBE, which is a component of gasoline.

Figure 6.4-1
E-05 & E-05R: Averages of Normalized Concentrations



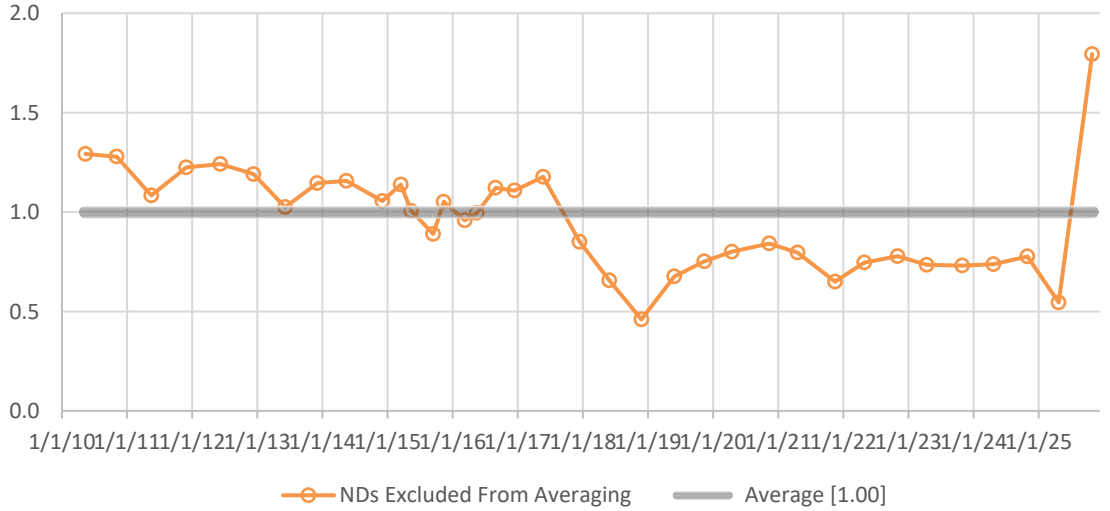
The October 2025 sample showed a plateau in total VOC concentration. This is primarily due to the decrease of tert-butyl alcohol. Concentrations at E-05R will continue to be tracked.

Figure 6.4-2
E-07: Averages of Normalized Concentrations



As shown in Figure 6.4-2, well E-07, a well in proximity to E-05 (though screened deeper), the October 2025 sample showed an increase with respect to the previous sampling event due to increased concentrations of 1,1-DCA and DCFM. No clear trend is observed for this well, and the normalized concentrations over time will continue to be monitored.

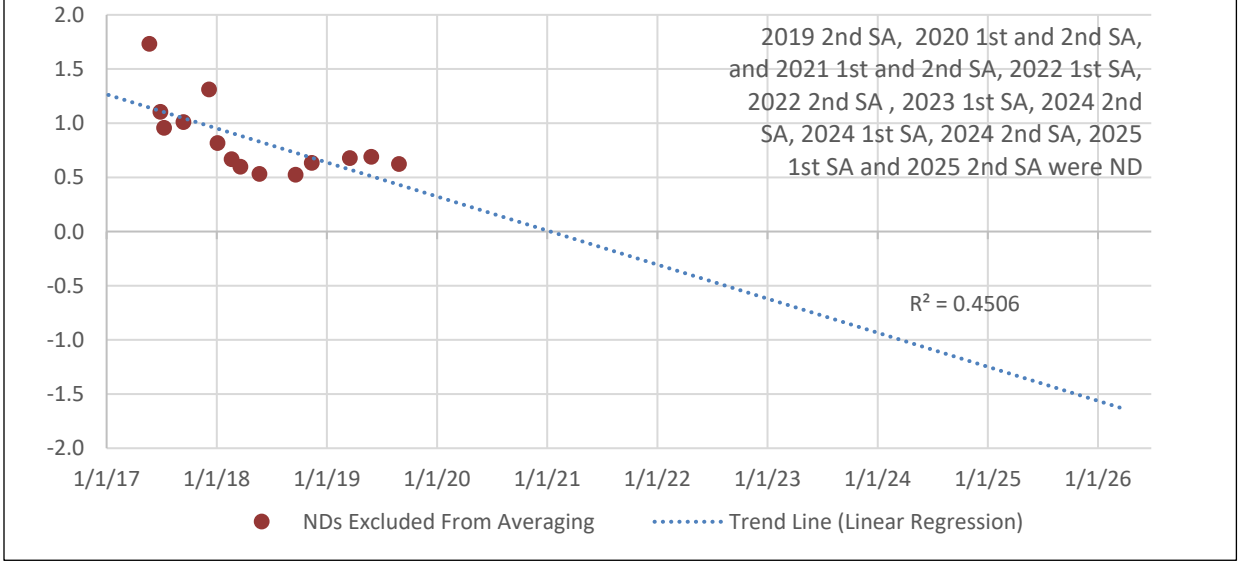
Figure 6.4-3
E-20B: Averages of Normalized Concentrations



Well E-20B is located on the east side of FA1. As shown in Figure 6.4-3, the average across all VOCs shows a decline in 2017 - 2018, but an increase from 2019 - 2021, bringing concentrations back to the historical average. The October 2025 sample was above average due to high concentration of tert-butyl alcohol. This will continue to be tracked.

At well MW-4A, at the northeast corner of FA1, samples collected during the past six years had no detections of VOCs and therefore it appears that the downward trend continues.

Figure 6.4-4
MW-4A: Averages of Normalized Concentrations



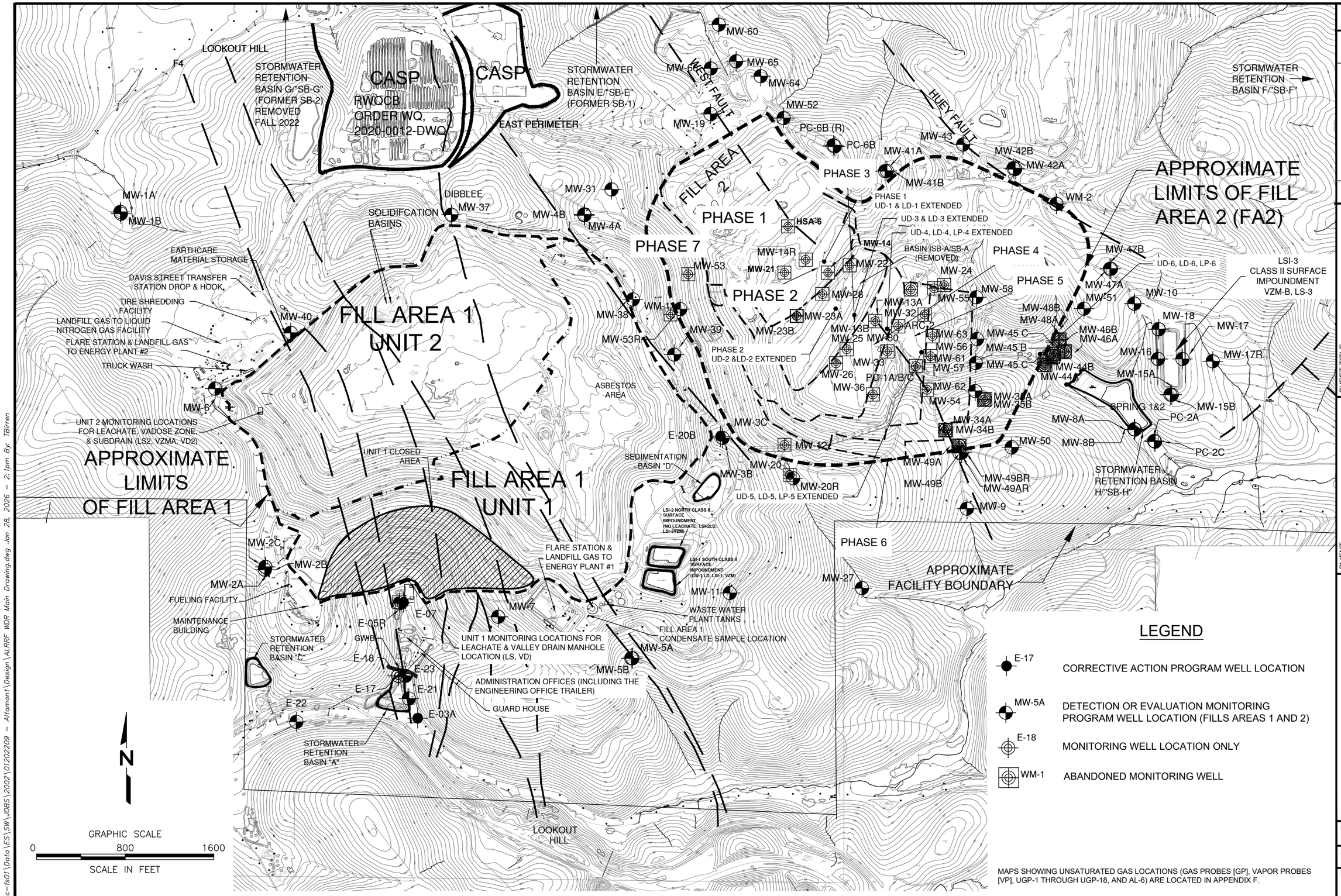
The SCS Engineers report states that the landfill gas collection and control system (GCCS) and LFG extraction wells are performing as expected and VOCs are continuing to decrease over time based on the VOC data, VOC time series plots, and LFG control system data.

RECOMMENDATION

We recommend continuing review of groundwater, unsaturated zone, leachate, and stormwater data as it becomes available, and evaluating trends in data, especially for groundwater monitoring wells where VOCs have previously been detected. Also, we recommend continuing review of laboratory QA/QC issues.

Attachments: Figure 6.4-5 - Groundwater Monitoring Network
Table 6.4-2 - Fill Area 1 and 2 Analytical Results Summary

Figure 6.4-5



LEGEND

- E-17 — CORRECTIVE ACTION PROGRAM WELL LOCATION
- MW-5A — DETECTION OR EVALUATION MONITORING PROGRAM WELL LOCATION (FILLS AREAS 1 AND 2)
- E-18 — MONITORING WELL LOCATION ONLY
- WM-1 — ABANDONED MONITORING WELL

MAPS SHOWING UNSATURATED GAS LOCATIONS (GAS PROBES [GP], VAPOR PROBES [VP], UGP-1 THROUGH UGP-18, AND AL-6) ARE LOCATED IN APPENDIX F.

SOURCE: JANUARY 10, 2022 TOPO PROVIDED BY WASTE MANAGEMENT

NO. | REVISION | DATE

SHEET TITLE: GROUNDWATER MONITORING NETWORK

PROJECT TITLE: ALTAMONT LANDFILL AND RESOURCE RECOVERY FACILITY ALAMEDA COUNTY, CALIFORNIA

CLIENT: Waste Management of Alameda County, Inc.

SCS ENGINEERS
ENVIRONMENTAL CONSULTANTS
3900 KILROY AIRPORT WAY, STE 100
LONG BEACH, CA 90806
PH. (562) 426-9544 FAX. (562) 427-0805

PROD. NO: 01202209.10 | DWN BY: T. BIRREN | ACAD FILE:
DSN. BY: A. HUTCHENS | CHK. BY: T. SCHMIESING | APP. BY: K. LISTER

DATE: FEBRUARY 2026

SCALE: 1" = 800'

FIGURE NO. 2

Table 6.4-2
Fill Areas 1 and 2 Analytical Results Summary
Altamont Landfill Resource and Recovery
Livermore, CA

Area	Sample ID	Sample Date	Acetone	Benzene	Benzyl Alcohol	Bromo	2, Butanone	n-Butyl benzene	sec-Butyl Benzene	tert-Butyl Benzene	Carbon Disulfide	Chloro-benzene	2-Chloro-toluene	4-Chloro-toluene	1,2-Dibromo-3-chloro-propane	1,2-Dichloro-benzene	1,3-Dichloro-benzene	1,4-Dichloro-benzene	cis-1,2-dichloroethene	1,1-Dichloroethane	1,1-Dichloroethene	1,2-Dichloropropane	1,2-Dichloroethane	Dichlorodi-fluoromethane	Dichloro-flouromethane	Diethyl ether	Ethyl-benzene	Hexachloroethane	Isopropyl-benzene	4-Isopropyltoluene	Methylene Chloride	MIBK	Methyl tert-butyl ether	Napthalene	n-Propylbenzene	Styrene	Tert-Butyl-Alcohol	1,1,2,2-Tetra-chloro-ethane	Tetrachloroethene	Tetrahydrofuran	Toluene	Trichloroethene	Vinyl chloride	Xylenes	Comment
Fill Area 1																																														
West of FA1	MW-2A	10/30/2025																																												Monitoring Well
	MW-40	10/30/2025																																				X[2]								POC Monitoring Well
	MW-6	10/30/2025																																											Monitoring Well
	MW-1A	10/28/2025																																												Monitoring Well
Canyon South of Fill Area 1	E-05R	10/30/2025																								X[2]												X[2]				X				Corrective Action Well Matches Historical Data
	E-07	10/31/2025																	X[2]	X				X	X	X[2]												X[2]		X[2]	X[2]		X[2]			Corrective Action Well Matches Historical Data
	E-23	10/31/2025																																											Corrective Action Well
	E-03A	10/31/2025																																												Corrective Action Well
NE of FA1	MW-4A	10/28/2025																																												Monitoring Well
	MW-37	10/30/2025																																												POC Monitoring Well
	MW-31	10/28/2025																																												Monitoring Well
South of FA1	MW-5A	10/29/2025																																												Monitoring Well
	MW-7	10/30/2025																																												Monitoring Well
	MW-11	10/29/2025																																												Monitoring Well
East of Fill Area 1	E-20B	10/28/2025																		X[2]					X[2]	X[2]												X[2]			X[2]				Corrective Action Well Matches Historical data
	MW-38	10/29/2025																																												POC Monitoring Well
	MW-39	10/29/2025																																												POC Monitoring Well
	MW-3B	10/29/2025																																												Monitoring Well
Downgradient of E-20B	MW-27	11/4/2025																																												Downgradient Evaluation Well
	MW-20R[5]	10/28/2025																																												Downgradient Evaluation Well
Fill Area 2																																														
	MW-41B	11/13/2025																																												POC Monitoring Well
	MW-49BR	11/25/2025																																												POC Monitoring Well

LANGAN

Table 6.4-2
Fill Areas 1 and 2 Analytical Results Summary
Altamont Landfill Resource and Recovery
Livermore, CA

Notes
VOC - Volatile Organic Compound
POC - Point of Compliance
X - Detection.
[1] First detection.
[2] Concentration reported is estimated because it is below the reporting limit and above its method detection limit.
[3] Analyte was detected in method, trip, and/or field blanks associated with a different lot during the same event, but not detected in the quality control blanks associated wih this particular sample.
[4]Denotes constituent also found in trip blank
[5]MW-20R was constructed to replace MW-20 in October 2022 because MW-20 was abandoned in April 2022.
[6] MW-8A, MW-8B, MW-9, MW-15B, MW-10, MW-16, MW-17, MW-17(R), MW-18, MW-19, MW-27, MW-41A, MW-42A, MW- 43, MW-44A, MW-44B, MW-45A, MW-45B, MW-45C, MW-46A, MW-46B, MW-47A, MW-47B, MW-48A, MW-48B, MW-49AR, MW-50, MW-51, MW-52, PC-2A, PC-2C, PC-6B(R), WM-2 were also sampled during this event and no detection of VOCs were reported.

LANGAN

135 Main Street San Francisco, CA 94104 T: 415.955.5200 F: 415.955.5201

Memorandum

To: ALRRF Community Monitor Committee

From: Langan – Community Monitor

Date: April 8, 2026

Re: **CMC Meeting of 4/8/26 - Agenda Item 6.5 - Updates on PFAS regulations and monitoring requirements**

PFAS MONITORING

The Committee Members have expressed continued interest in new developments related to per- and polyfluoroalkyl substances (PFAS) to better understand future requirements that may affect the landfill. Products known to contain PFAS are regularly disposed of in landfills.

California and Federal agencies are in the process of evaluating health risks and developing guidance for PFAS.

New Information

On January 26, 2026, Order DW-2022-0001-DDW was amended[1]. This Order is a Division of Drinking Water (DDW) General Order that requires PFAS monitoring by public water systems pursuant to California Health & Safety Code §116378. The amended Order replaces and updates prior requirements and formally rescinds PFAS monitoring Orders DW-2020-003 and DW-2021-0001. It incorporates the revised PFAS notification and response levels issued on October 29, 2025, as well as the Office of Environmental Health Hazard Assessment (OEHHA) public health goals adopted on April 4, 2024. In addition, the amendment refines the requirements for how PFAS monitoring is conducted. Overall, the amended Order updates drinking water system monitoring and reporting requirements for public water systems and does not impose new PFAS monitoring or corrective action obligations on the landfill or Dyer Road wells.

Old Information (Chronological from Oldest to Newest)

At the ALRRF, PFAS were sampled in November 2019 in response to the State Water Resources Control Board's (SWRCB) investigative order (WQ 2019-0006-DWQ). The PFAS samples were analyzed by Eurofins TestAmerica in West Sacramento.

Leachate samples for Fill Area 1 reported total concentrations from approximately 21,000 to 26,000 parts per trillion (ppt). Fill Area 2 leachate sample (LS-4) reported concentrations considerably lower, with a total concentration of approximately 2,700 ppt. Trace concentrations (<2.0 ppt) of three PFAS compounds were detected in background monitoring well PC-6B(R),

[1] https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/pfas_ddw_general_order/docs/amended-pfas-general-order-2022-final.pdf

in the previously affected assessment and corrective action areas. In particular, wells E-05 and E-07 reported concentrations of approximately 2,000 and 1,200 ppt, respectively. Concentrations for wells E-20B and MW-20 were 650 and 670 ppt, respectively.

The concentrations reported at the ALRRF were below the maximum concentrations for groundwater and leachate at other landfills covered by the PFAS Order, and within the middle of the range. Neither the SWRCB nor the Central Valley Regional Quality Control Board (CVRWQCB) have requested additional monitoring at this moment.

On May 18, 2022, the U.S. Environmental Protection Agency (EPA) added five PFAS to a list of risk-based values for site cleanups[1]. These levels are used by the EPA and other agencies in the investigations of contaminated sites. No updates to the risk-based values have occurred for PFAS since May 2022.

On June 15, 2022 the EPA announced new drinking water health advisories for PFAS[2]. The EPA issued interim, updated drinking water health advisories for two substances and final health advisories for two additional substances. These health advisories inform the maximum contaminant levels allowed in drinking water, and would not have an effect at this moment on landfills.

On August 17, 2022 the Division of Drinking Water presented at the State Water Resource Control Board meeting on the Notification and Response Levels for Perfluorohexane Sulfonic Acid[3]. There is continued progress through the discussion of this topic from regulatory agencies but at this time no direct regulatory updates have occurred.

On August 26, 2022 the EPA announced under the Administrator Regan's PFAS Strategic Roadmap, significant action to protect communities health from the risks posed by certain PFAS's[4]. The EPA is proposing that PFAS become designated as a hazardous substance under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), or "Superfund." This would increase transparency around the releases of PFAS and help hold polluters accountable for the cleanup. This proposal applies toward PFOA and PFOS.

On March 14, 2023, the EPA announced proposed national primary drinking water maximum contaminant levels (MCLs) for six PFAS (PFOA and PFOS as individual contaminants, and four contaminants as a PFAS mixture). The proposed regulation would require public water systems to monitor, notify the public of the contaminant levels, and treat drinking water to reduce the levels of these PFAS if they exceed the proposed MCLs[5]. California-specific MCLs for PFAS have

[1] https://www.epa.gov/risk/regional-screening-levels-rsls-whats-new
[2] https://www.epa.gov/newsreleases/epa-announces-new-drinking-water-health-advisories-pfas-chemicals-1-billion-bipartisan
[3] https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/pfas.html
[4] https://www.epa.gov/newsreleases/epa-proposes-designating-certain-pfas-chemicals-hazardous-substances-under-superfund
[5] https://www.epa.gov/sdwa/and-polyfluoroalkyl-substances-pfas

not yet been established as of March 2023[3], and the proposed regulations do not require any actions until finalized, likely by the end of 2023[6].

On May 4, 2023, the EPA generated tables that reflect changes in the toxicity and chemical specific parameters per regional screening levels hierarchies[7]. The table compares the previous toxicity database to this new and current table. This update is in response to the Integrated Risk Information System (IRIS) which is a part of the risk assessment process in which hazard identification and dose-response assessment are applied to derive toxicity values.

On February 1, 2024, the Biden-Harris Administration announced new steps to protect communities from PFAS and other emerging chemicals of concern.[7] The EPA is proposing to modify the definition of hazardous waste as it applies to the cleanups permitted at hazardous waste facilities to ensure the EPA's regulations are clearly reflected and authorizes states authorities to require the cleanup of the full range of substances under the Resource Conservation and Recovery Act (RCRA). The EPA states that the proposed rules would "strengthen protections for communities and drinking water supplies located near the 1,740 permitted hazardous waste facilities across the nation." This would include corrective action under RCRA, requiring facilities that treat, store, or dispose of hazardous waste to investigate and mitigate hazardous releases into soil, groundwater, surface water and air. The EPA will publish the proposals in the Federal Register.

Regarding corrective actions, known technologies for treating PFAS in water include granular activated carbon, ion exchange, and reverse osmosis[8]. Granular activated carbon and ion exchange resins remove chemicals by sorption (the chemical is attached to the media), which reduces concentrations of chemicals in the effluent water of the system. Reverse osmosis removes contaminants by pushing water through a semipermeable membrane, effluent water has less chemicals, and a portion of the water (rejected water or concentrate) is collected for disposal. PFAS do not degrade in the environment, and one of the few technologies that can potentially destroy PFAS is incineration.

On April 10, 2024, the EPA announced the final National Primary Drinking Water Regulation (NPDWR) for six PFAS.[9] Legally enforceable MCLs for six PFAS in drinking water have been finalized: PFOA, PFOS, PFHxS, PFNA and HFPO-DA and PFBS, using a Hazard Index MCL. The EPA also finalized health-based, non-enforceable MCL goals for these PFAS. The EPA is making funding available to ensure clean and safe water, $1 billion dollars in funds will be accessible through the new 'Bipartisan Infrastructure Law' helping states and territories implement PFAS testing and treatment at public water systems, and to help private owners of wells address PFAS

[6] https://www.epa.gov/sdwa/and-polyfluoroalkyl-substances-pfas
[7] https://www.epa.gov/risk/regional-screening-levels-rsls-whats-new

[7] https://www.epa.gov/newsreleases/biden-harris-administration-announces-new-steps-protect-communities-pfas-and-other
[8] Interstate Technology and Regulatory Council (ITRC), 2022. Treatment Technologies – PFAS — Per- and Polyfluoroalkyl Substances. https://pfas-1.itrcweb.org/12-treatment-technologies/#12_1. Accessed on March 10, 2022.
[9] https://www.epa.gov/sdwa/and-polyfluoroalkyl-substances-pfas

contamination. The EPA is prioritizing funding based on a formula that includes factors for population below poverty, small water systems, and occurrence of unregulated emerging contaminants.[10]

On April 19, 2024, the EPA announced that it was designating two types of PFAS, perfluorooctanoic acid (PFOA) and perfluorooctanesulfonic acid (PFOS) as Comprehensive Environmental Response Compensation and Liability Act (CERCLA) hazardous substances. EPA does not intend to pursue entities such as publicly owned/operated municipal solid waste landfills for PFAS under CERCLA.

On 8 July 2024, the EPA final rule designating two PFAS (PFOA and PFOS), including their salts and structural isomers - as hazardous substances under CERCLA became effective. In response, Langan reviewed the Data Submittal for Compliance with 13267 Order WQ 2019-0006-DWQ prepared by Wood Environment & Infrastructure Solutions, Inc., 2019, on behalf of Waste Management, to understand concentration of CERCLA PFAS at the landfill. This report was produced in response to the State Water Resources Control Board (SWRCB) Order that required groundwater and leachate sampling for per- and polyfluoroalkyl substances.

The SWRCB ESLs for direct exposure human health risk levels (MCL priority) is 6.5 nanograms/L (ng/L) for PFOA and 5.1 ng/L for PFOS. The EPA Final MCLs for PFOA and PFOS are 4 parts per trillion (ppt) or 4 ng/L. These criteria are for drinking water.

PFOA was detected in leachate above the MCL priority at:

- 1,200 ng/L (LS1)
- 59 ng/L (LSI-4)
- 1,600 ng/L (LS2)

PFOS was detected in leachate above the MCL priority at:

- 130 ng/L (LS1)
- 26 ng/L (LSI-4)
- 110 ng/L (LS2)

PFOA was detected in groundwater above the MCL priority at:

- 10 ng/L (MW-13B)
- 10 ng/L (MW-4A)
- 80 ng/L (MW-20)
- 400 ng/L (E-05)
- 150 ng/L (E-07)
- 130 ng/L (E-20B)

PFOS was detected in groundwater above the MCL priority at:

- 110 ng/L (MW-20)
- 36 ng/L (E-05)

[10] https://www.epa.gov/system/files/documents/2023-02/EC%20Grant%20implementation%20manual_February%202023_final_508_0.pdf

- 26 ng/L (E-07)
- 7.9 ng/L (E-20B)

On January 20, 2025, the President of the United States issued a Presidential Memorandum on Regulatory Review. In this memorandum, it states that:

- No new rules are to be proposed or issued until reviewed and approved by a new department or agency head.
- Any rules sent to the Office of the Federal Register but not yet published must be withdrawn for review and approval
- To consider postponing the effective date of published or issued but not yet effective rules
- If no substantial questions arise, no further action is needed. For rules with substantial questions, notify and consult with the Office of Management and Budget (OMB) Director for appropriate action.

With this memorandum, the EPA delayed the effective date for "Implementing Statutory Addition of Certain Per- and Polyfluoroalkyl Substances (PFAS) to Toxics Release Inventory (TRI) Beginning with Reporting Year 2025" from 5 February 2025 to 21 March 2025. This final rule would subject nine PFAS to the same reporting rules as other chemicals of "special concern."

The Office of Information and Regulatory Affairs, of the Office of Management and Budget per the Executive Office of the President on 21 January 2025 withdrew EPA's proposed rule on the *Clean Water Effluent Limitation Guidelines and Standards for PFAS Manufacturers Under the Organic Chemicals, Plastic and Synthetic Fibers Point Source Category*. The concluded action is that this regulatory review has been withdrawn.

On September 17, 2025, the EPA released an announcement that the Department of Justice submitted a court filing on behalf of the EPA related to the designation of perfluorooctanoic acid (PFOA) and perflurooctanesuflonic acid (PFOS) as CERCLA hazardous substances[11]. The EPA notes that the CERCLA designation can impose costly requirements on entities who release hazardous substances to the environment, which can include "passive receivers" such as entities who receive PFAS in waste like a landfill. EPA goes on to note that they continue to collect information about how passive receivers are saddled with unknown liability and costs related to receipt of PFAS and how a possible solution is a statutory fix to protect passive receivers. EPA also intends to develop a CERCLA Framework Rule to "provide a uniform approach to guide future hazardous substance designations, including how the agency will consider the costs of proposed designations." EPA notes that costs to manufacturers, passive receivers, consumers, and the economy should be taken seriously during future designations. This announcement may mean that the future listing of other PFAS compounds as hazardous substances will be highly limited/restricted, if it occurs at all, and the EPA may seek to protect or exempt landfills and other passive receivers from responsibilities related to indirect PFAS contamination (i.e., other than manufacture or generation of PFAS).

[11] https://www.epa.gov/newsreleases/trump-epa-announces-next-steps-regulatory-pfoa-and-pfos-cleanup-efforts-provides

On October 29, 2025, the State of California, under the authority of the Deputy Director of the State Water Board's Division of Drinking Water (DDW), issued revised notification and response levels for perfluorooctanoic acid (PFOA), perfluorooctanesulfonic acid (PFOS), perfluorohexane sulfonic acid (PFHxS) and perfluorohexanoic acid (PFHxA).[12]

Notification and response levels are non-regulatory, health-based advisory levels established for contaminants in drinking water. Maximum contaminant levels for drinking water have not yet been established. The revised levels are:

- PFOA: notification level = 4.0 ng/l, response level = 10 ng/l
- PFOS: notification level = 4.0 ng/l, response level = 40 ng/l
- PFHxS: notification level = 3.0 ng/l, response level = 10 ng/l
- PFHxA: notification level = 1.0 mg/l, response level = 10 mg/l

"Notification and response levels are established as precautionary measures for contaminants that may be considered candidates for establishment of maximum contaminant levels but have not yet undergone or completed the regulatory standard setting process prescribed for the development of maximum contaminant levels and are not drinking water standards."[1]

A response level is the level at which DDW recommends removal of a drinking water source from service.

A notification level requires the drinking water system to "notify the local governing body of the local agency in which the users of the drinking water reside." These levels are not directly applicable to ALRRF but may apply to drinking water wells associated with residences located along Dyer Road, in the vicinity of the landfill.

[12] New and Revised Drinking Water Notification and Response Levels for PFOA, PFOS, PFHxS, and PFHxA

LANGAN

Memorandum

135 Main Street San Francisco, CA 94015 T: 415.955.5200 F: 415.955.5201

To: ALRRF Community Monitor Committee

From: Langan, Community Monitor

Date: April 8, 2026

Re: **CMC Meeting of 4/8/26 – Agenda Item 6.6 – Reports From Community Monitor**

ALTAMONT MONTHLY OPERATIONS AND RECORDS REVIEW

During the first quarter of 2026, three site visits were performed by the Community Monitor. In addition to site visits, summaries of LEA inspections available on CalRecycle's website are reviewed and important issues are highlighted in the monthly reports. The reports in this item include:

- Community Monitor Site Visit for January, which took place on January 13, 2026.
- Community Monitor Site Visit for February, which took place on February 3, 2026.
- Community Monitor Site Visit for March, which took place on March 3, 2026.

Details about operations-related matters are provided in the attached reports. For the first quarter: disposal operations were occurring in FA2, Phase 6; continued operations within FA1 solidification basins, continued construction of FA2 solidification basins, reinforced fence installation and wind-blown litter mitigation.

During the first quarter of 2026, there were no special occurrences.

ALRRF Community Monitor Monthly Report **December 2025**

Monthly Tonnage Report for December 2025, received January 15, 2026

Tonnage Summary:		tons	
	Disposed, By Source Location		
1.1	Tons Disposed from Within Alameda County	82,204.43	
1.2	Other Out of County Disposal Tons	1,815.79	
	subtotal Disposed	84,020.22	
	Disposed, By Source Type		
2.1	C&D	320.69	
2.2	MSW	81,958.76	
2.3	Special Wastes	2,740.77	
	subtotal Disposed	85,020.22	
		1,000.00	1.18%
	Other Major Categories		
2.4	Re-Directed Wastes (Shipped Off Site or Beneficially Used)	0.00	
2.5	Revenue Generating Cover	51,185.15	
	Total, 2.1 - 2.5	136,205.37	
	Materials of Interest		
2.1.1	Fire Debris	320.69	
2.3.1	Friable Asbestos	504.95	
2.3.2	Treated Wood	76.39	
2.5.1	Class 2 Cover Soils	21,451.01	
2.5.2	Auto Shredder Fluff	12,633.52	
2.5.3	Processed Green Waste/MRF fines, Beneficial Use (GSET)	0.00	
2.5.4	MRF Fines for ADC	178.76	

ALRRF Reports from Community Monitor

January 2026

Site Visit January 13, 2026, 9:00 AM – 12:00 PM

- Attended by Megan Rollo (Langan, Community Monitor), Ryan Hammon; Aide Villegas (LEA)
- Escort: Louis Rocha (Waste Management), unannounced.
- Weather: Sunny, 52°F. Poor Air Quality.

General Observations

- Traffic to the site was flowing freely through the road and the entrance of the landfill upon arrival.
- The scale houses appeared to be in good condition.

Fill Area 1

- Fill Area 1 (FA1) was observed at the LSI ponds.
- The LSI ponds were in good condition. LSI-2, which holds underdrain and rainwater was observed with 10 feet of freeboard.
- LSI-1, which holds leachate, had 5 feet of freeboard.

Fill Area 2

- Landfill operations were occurring on Phase 6 for public use and commercial use.
- Several birds present. WM deployed screamers at time of visit.
- Four tippers present in FA2.
- Several piles of ADC present.

Back-40 and Bethanny Reservoir

- No litter observed in the Back-40.
- No litter observed on the roadway to and at Bethanny Reservoir.

Solidification Basins in FA2

- Construction of the solidification basins in FA2 continue.

ALRRF Community Monitor Monthly Report **January 2026**

Monthly Tonnage Report for January 2026, received February 15, 2026

Tonnage Summary:		tons	
	Disposed, By Source Location		
1.1	Tons Disposed from Within Alameda County	86,851.04	
1.2	Other Out of County Disposal Tons	2,090.95	
	subtotal Disposed	88,941.99	
	Disposed, By Source Type		
2.1	C&D	473.32	
2.2	MSW	84,904.44	
2.3	Special Wastes	3,564.23	
	subtotal Disposed	88,941.99	
		0.00	0.00%
	Other Major Categories		
2.4	Re-Directed Wastes (Shipped Off Site or Beneficially Used)	1.82	
2.5	Revenue Generating Cover	46,953.75	
	Total, 2.1 - 2.5	135,897.56	
	Materials of Interest		
2.1.1	Fire Debris	473.32	
2.3.1	Friable Asbestos	649.48	
2.3.2	Treated Wood	129.05	
2.5.1	Class 2 Cover Soils	13,567.80	
2.5.2	Auto Shredder Fluff	16,882.21	
2.5.3	Processed Green Waste/MRF fines, Beneficial Use (GSET)	0.00	
2.5.4	MRF Fines for ADC	164.26	

ALRRF Reports from Community Monitor

February 2026

Site Visit February 3, 2026, 9:00 AM – 12:00 PM

- Attended by Megan Rollo (Langan, Community Monitor), Ryan Hammon; Aide Villegas (LEA)
- Escort: Louis Rocha (Waste Management), announced.
- Weather: Sunny, with fog in the low areas. 55°F.

General Observations

- Traffic to the site was flowing freely through the road and the entrance of the landfill upon arrival.
- The scale houses appeared to be in good condition.

Fill Area 1

- Fill Area 1 (FA1) was observed at the LSI ponds.
- The LSI ponds were in good condition. LSI-2, which holds underdrain and rainwater was observed with 15 feet of freeboard.
- LSI-1, which holds leachate, had 5 feet of freeboard.

Fill Area 2

- Landfill operations were occurring on Phase 6 for public use and commercial use.
- Several birds present. WM deployed screamers at time of visit.
- Three tippers present in FA2.
- Several piles of ADC present.

Alternative Daily Cover (ADC)

Back-40 and Bethanny Reservoir

- No litter observed in the Back-40.
- No litter observed on the roadway to and at Bethanny Reservoir.
- Low visibility of Reservoir due to low fog.

Solidification Basins in FA2

- Construction of the solidification basins in FA2 continue.
- Paving completed, fencing actively being installed surrounding basins.

Evapotranspirative Cover

- ET Cover appears to be in good condition.

Other Environmental Observations / Issues

- Observed active dust management with water truck.

Special Occurrences

- There were no special occurrences during the month of February.

ALRRF Community Monitor Monthly Report **February 2026**

Monthly Tonnage Report for February 2026, received March 13, 2026

Tonnage Summary:		tons	
	Disposed, By Source Location		
1.1	Tons Disposed from Within Alameda County	80,627.01	
1.2	Other Out of County Disposal Tons	2,696.46	
	subtotal Disposed	83,323.47	
	Disposed, By Source Type		
2.1	C&D	623.08	
2.2	MSW	74,348.17	
2.3	Special Wastes	8,352.22	
	subtotal Disposed	83,323.47	
		0.00	0.00%
	Other Major Categories		
2.4	Re-Directed Wastes (Shipped Off Site or Beneficially Used)	1.00	
2.5	Revenue Generating Cover	33,088.79	
	Total, 2.1 - 2.5	116,413.26	
	Materials of Interest		
2.1.1	Fire Debris	623.08	
2.3.1	Friable Asbestos	767.25	
2.3.2	Treated Wood	88.79	
2.5.1	Class 2 Cover Soils	4,162.19	
2.5.2	Auto Shredder Fluff	11,941.66	
2.5.3	Processed Green Waste/MRF fines, Beneficial Use (GSET)	0.00	
2.5.4	MRF Fines for ADC	223.01	

ALRRF Reports from Community Monitor

March 2026

Site Visit March 3, 2026, 9:00 AM – 12:00 PM

- Attended by Megan Rollo (Langan, Community Monitor), Ryan Hammon (LEA)
- Escort: Louis Rocha (Waste Management), announced.
- Weather: Sunny, 61°F, light wind.

General Observations

- Traffic to the site was flowing freely through the road and the entrance of the landfill upon arrival.
- The scale houses appeared to be in good condition.

Fill Area 1

- Fill Area 1 (FA1) was observed at the LSI ponds.
- The LSI ponds were in good condition. LSI-2, which holds underdrain and rainwater was observed with 9 feet of freeboard.
- LSI-1, which holds leachate, had 4 feet of freeboard.

Fill Area 2

- Landfill operations were occurring on Phase 6 for public use and commercial use.
- Two tippers present in FA2.
- Several piles of ADC present.

Back-40 and Bethanny Reservoir

- No litter observed in the Back-40.
- No litter observed on the roadway to and at Bethanny Reservoir.

Solidification Basins in FA2

- Construction of the solidification basins in FA2 continue.
- Fencing surrounding perimeter of basins beginning installation.

Other Environmental Observations / Issues

- None.

Special Occurrences

- There were no special occurrences during the month of March.