Final

ALRRF COMMUNITY MONITOR ANNUAL REPORT 2009

Prepared for
ALRRF Community Monitor Committee

April 28, 2010

TABLE OF CONTENTS

ALRRF Community Monitor Annual Report 2009

SECTION 1
Introduction

1.1 Settlement Agreement

In December 1999, a Settlement Agreement was reached among parties involved in a lawsuit regarding the proposed expansion of the Altamont Landfill and Resource Recovery Facility (ALRRF). The Settlement Agreement established the Community Monitor Committee (CMC) and a funding mechanism for a technical consultant to the CMC, referred to as the Community Monitor (CM).

The Committee manages the CM, within the constraints of the Settlement Agreement, which defines the purview of the CMC and the CM. The CM's scope of work is further described in a contract between the CM and the CMC. In broad terms, the CM is to review certain reports and information, as defined; monitor incoming traffic by conducting truck counts, as described in the Settlement Agreement; and periodically inspect the ALRRF site.

The Settlement Agreement also requires that the ALRRF operator, Waste Management of Alameda County (WMAC), pay invoices submitted by the CM to the CMC, if the work represented in those invoices is consistent with the CM's scope of work and the CM role as defined in the Settlement Agreement.

The City of Livermore provides staff and administrative support to the CMC, as well as administration of the CM contract and space for CMC meetings. The City also acts as financial agent for the CMC, pursuant to a letter agreement dated July 6, 2004.

1.2 Prior Community Monitor Work

Available records indicate that the CMC retained a technical consultant as the CM from 2005 through 2007.

In mid 2007, the CMC solicited proposals for continuation of CM services, received two proposals, and selected the current CM team of Environmental Science Associates and Treadwell & Rollo. This team began work in February 2008. In that first year, report reviews, reviews of Class 2 soil analysis files, and site inspections were carried out as intended. In that time period, the primary issue of concern was the rate at which groundwater monitoring wells were purged during sampling. This was resolved satisfactorily.

1.3 Overview of Operations

Like most large landfills throughout California, the ALRRF performs a variety of functions that support the region's management of solid wastes. These functions continue to grow and evolve as increasing emphasis is placed on reducing and recovering wastes, but the primary function of the site continues to be the safe disposal of solid wastes by placing, compacting and covering these materials. Federal, State and local regulations require that:

- Wastes are covered to control litter, prevent fire, and prevent the spread of disease.
- Wastes are placed and compacted in a manner that is physically stable.
- A liner and liquid recovery system prevent groundwater contamination by leachate.
- Landfill gas is controlled by an extraction system.
- Emissions from energy systems (diesel engines and landfill gas systems) are controlled.
- Other air pollutants and nuisances (dust, odor, litter, etc.) are prevented.
- Stormwater erosion is controlled and stormwater runoff is tested for pollutants.

Compliance with these requirements protects the environment and public health, and it also presents opportunities to develop and support innovative methods for improved waste management. Currently, such activities on the ALRRF include:

- using landfill gas to produce electricity;
- operating a plant that converts landfill gas to a liquid fuel (LNG);
- stockpiling and processing materials for beneficial use on site, such as using waste concrete for wet-weather roads and access pads;
- providing space to stockpile and load-out compost feedstock;
- using contaminated soils as cover material, as permitted;
- stockpiling construction and demolition materials for processing elsewhere; and
- hosting site visits, by prior arrangement, for public education.

The ALRRF property covers more than three square miles. Within that area, the portion that is delineated as landfill is divided into Fill Area 1 (currently active) and Fill Area 2 (anticipated to be developed in the near future). The active parts of Fill Area 1 cover approximately 211 acres.

Lands surrounding the active area are managed primarily as grazing land, with portions leased for wind energy. These surrounding lands also provide habitat for several special status species. The active area will be supplemented by the expansion area (Fill Area 2) when all permits are obtained. Waste Management intends to begin the construction of Fill Area 2 in 2011 and has been working to resolve several issues regarding permit conditions. Many have been resolved; in 2009 the ALRRF received its revised Waste Discharge requirements from the Regional Water Quality Control Board, and an updated set of permits from the Bay Area Air Quality Management District. However, some details regarding biological mitigation areas have not yet been finalized. The forthcoming development of Fill Area 2 is discussed further in Section 3 of this report.

1.3.1 Industry Trends

Trends in the landfill disposal industry within the greater Bay Area have affected, and will continue to affect, operations and future developments at the ALRRF. There are no new landfill sites currently in development in the region, and several sites (West Contra Costa, Sonoma County, Tri-Cities) have closed recently or will close very soon. One site (Redwood Landfill, near Novato) has obtained a permit to expand, but that permit includes conditions that limit its daily tonnage to, essentially, current levels. Other sites (Potrero Hills and Keller Canyon) are

attempting to expand the daily volume and/or total volume that they may accept, but these expansions are being challenged and the outcome is uncertain. In the immediate future, the Tri-Cities landfill is expected to cease receiving refuse in mid 2010, and those wastes (primarily from the Fremont area) will be transferred to the ALRRF.
Another trend in the industry, long-distance rail-haul of refuse, will likely have an effect on the ALRRF site in the future. In 2009, approximately 37% of the tonnage received at ALRRF originated in San Francisco, under a contract that expires when the total delivered tonnage reaches 15 million tons. This is currently projected to occur as soon as 2014. The City is in the process of negotiating for the subsequent rail haul of its wastes to Ostrom Road Landfill, in Yuba County; and the hauler of those wastes, Recology, has been working to develop a landfill near Winnemucca, Nevada, to provide a long-term disposal site for these materials. The Nevada landfill development is currently facing strong local opposition. However, it appears likely that San Francisco refuse will cease to be delivered to the ALRRF in approximately 2014.

1.3.2 Site-Specific Constraints and Opportunities

The Settlement Agreement added new conditions to the Use Permit for the ALRRF. Solid wastes from out-of-county sources are strictly limited to those covered by existing disposal agreements. During peak traffic hours, the number of refuse trucks entering the landfill is limited. Numerous conditions intended to protect natural resources on the ALRRF property were imposed. Also, the size of the future expansion area was limited to 40 million tons of capacity, with a footprint of approximately 250 acres. In addition to Use Permit conditions, the Settlement Agreement establishes the CMC and the CM role, as described above; and it sets up mitigation funding related to the landfill expansion.

The physical setting of the ALRRF site also presents certain constraints and opportunities. Hilly terrain and high winds require constant attention to windblown litter, especially film plastic bags and foam plastic packaging. Proximity to the South Bay Aqueduct has led to the recent eminent-domain condemnation of a portion of the landfill property, for use as a reservoir, by the California Department of Water Resources; and this has complicated the ALRRF's efforts to comply with a Use Permit requirement for 750 acres to be set aside for biological habitat mitigation and buffer area.

Local policies and needs are likely to result in further changes. The Alameda County Waste Management Authority and Recycling Board goal of 75% waste diversion by 2010 is continuing to decrease waste flows into the ALRRF, most recently through a ban on plant debris disposal enacted by the ACWMA. That agency is also promoting efforts in many local jurisdictions to divert more organic refuse, including food scraps, into composting processes rather than landfill disposal.

A variety of other recent site-related developments may be viewed as constraints, opportunities, or (in some cases) both:

- The Regional Water Board's permit for the site has been revised to accommodate the expansion into Fill Area 2, and in the process of updating the permit requirements, some have been made more stringent (such as stormwater sampling) and others have been relaxed (such as the choice of parameters to be measured at certain groundwater monitoring locations).
- A landfill gas (LFG) to liquefied-natural-gas (LNG) plant has been constructed at the site and is in operation, reducing greenhouse gas emissions while helping to control landfill gas.

- The volume of refuse delivered to the site declined sharply soon after the current recession began in late 2008, and it is continuing to decline, presumably due to a decrease in business activity and consumer purchasing.

SECTION 2
Community Monitor Activities and Issues

2.1 Introduction

Under the terms of the Settlement Agreement, when the ALRRF is in compliance with operating requirements the Community Monitor (CM) has three ongoing duties:

- Review reports, data and information related to the ALRRF's reports that are required to be submitted to regulatory agencies
- Conduct monthly inspections of the ALRRF facility
- Review the records of testing and acceptance of "Class 2 soils", i.e. soils known to come from a contaminated site.

During the second contract year, the CM was active in each of these areas, as described below.

A general matter of procedure was also determined. The minutes of the May 13, 2009 summarize this issue as follows:

> After discussion of the need for clarity regarding the ability of the Community Monitor (CM) to initiate contact with regulatory agencies to seek interpretation of the terms of the Settlement Agreement or the Conditional Use Permit, the Committee determined that if the CM believes that such contact is necessary, he should first discuss the need with Waste Management ; and if Waste Management objects to that contact, the CM should report on the situation to the Community Monitor Committee.

2.2 Review of Reports

2.2.1 Semiannual Groundwater Monitoring Reports

Two groundwater monitoring reports were reviewed in the 2009-10 contract year. The first covered the time frame from July through December of 2008; the second, January through June of 2009. The second of these reports reflects revisions to the permit that directly affects water quality monitoring and protection at the ALRRF, i.e., the Waste Discharge Requirements issued by the Central Valley Regional Water Quality Control Board. The revised WDR's took effect in April of 2009.

In 2009, groundwater monitoring and sampling activities at the ALRRF were performed by SCS Engineers. Treadwell & Rollo, Inc. reviewed the two semi-annual groundwater monitoring reports prepared by SCS to document groundwater monitoring, and prepared two memoranda to summarize review comments.

Groundwater monitoring activities performed and analytical results for the ALRRF were largely in compliance with the groundwater sampling plan and WDRs. Specific issues identified by Treadwell & Rollo during 2009 (or before) included the following:

- The need for backup information to support statistical calculations regarding trends in concentrations of contaminants in groundwater,
- Concentrations of nitrogen-rich compounds in the vadose zone wells, and
- Variations in concentrations of some organic and inorganic constituents at various monitoring wells.

2.2.1.1 Statistical Calculations

In the Spring of 2009, while reviewing the Groundwater Monitoring Report for 2008, Treadwell and Rollo staff reviewed the details of a statistical method cited within the report. This method, called the Shewhart CUSUM Control Chart method, indicates whether concentrations at a groundwater monitoring well are varying more than they have in the past. Such variation could indicate an impact to groundwater from the site. The Groundwater Monitoring report did not explicitly state all of the parameters that are used in this calculation. After dialog with Waste Management staff and some background research into the details of this method, Treadwell and Rollo staff were satisfied that the parameters being chosen for these calculations were reasonably conservative.

2.2.1.2 Compounds Detected in the Vadose Zone

The unsaturated zone, also termed the vadose zone, is the zone between the land surface and the top of the water table where soil pores are not fully saturated, although some water may be present. Treadwell & Rollo and ESA have been tracking the reported ammonia and total Kjeldahl nitrogen (TKN) concentrations in vadose zone monitoring point VZM-A. This monitoring point is a pan lysimeter located beneath the landfill in Unit 2, which is the active, lined portion of Fill Area 1. TKN in VZM-A has decreased in recent quarters, but there is still an overall increasing trend since monitoring began in 2001. Tetrahydrofuran (7.2 µg/L) increased slightly in VZM-A during the First Quarter of 2009, but that concentration is still lower than the historical maximum (10 µg/L) detected during Second Quarter 2008.

Because a continued increase in concentrations could indicate a change in the subsurface and groundwater geochemistry, or could indicate the presence of landfill by-products, the reported concentrations will continue to be reviewed.

2.2.1.3 Variations in Concentrations at Certain Monitoring Wells

First and Second Quarter 2009 volatile organic compound (VOC) and inorganic constituents' concentrations in groundwater were similar to historical values, with the following exceptions:

- Statistical exceedance of Total Kjeldahl Nitrogen (TKN) (1.6 milligrams per liter [mg/L]), and a slight increase of dissolved potassium in detection and corrective action (CAP) well E-23 during the Second Quarter.
- First historical detection of chloromethane (1.2 micrograms per liter [µg/L]), and first detection of carbon disulfide (0.54 µg/L) since 2002, in well E-23 during the Second Quarter. The reported results for both of these compounds were estimated and were below the laboratory reporting limits.

A statistical exceedance of TKN, a slight increase of dissolved potassium, and the detection of two VOCs at trace concentrations that were either historically not detected, or not detected since 2002 in well E-23, does warrant close evaluation. Concentrations of inorganics and VOCs in E-23 will continue being closely evaluated in future Groundwater Monitoring Reports to monitor for increasing trends.

2.2.2 Annual Mitigation Status Report

This report, covering calendar year 2008, is dated January 31, 2009. It is a table that lists each of the 106 conditions described in the current Conditional Use Permit (CUP), followed by a description of the implementation status of that condition or mitigation.

We found that the status descriptions accurately reflected the current status of each mitigation measure. However, the required timing for implementation of some mitigation measures is not explicitly stated in the CUP and may be subject to interpretation. The CMC may wish to seek a determination from County Planning regarding the timing of measures that do not contain explicit dates for implementation.

2.2.3 Semiannual Title V Report

Title V is one of several programs authorized by the U. S. Congress in the 1990 Amendments to the federal Clean Air Act (CAA). The Bay Area Air Quality Management District (BAAQMD) administers Title V requirements for the ALRRF. Title V operating permits include the requirements of all regulations that apply to operations. Hence, the Title V reports provide a comprehensive review of compliance with BAAQMD permits and regulations.

In 2009, we received the Title V reports for the periods June – November 2008, and December 2008 – May 2009. These reports largely consist of routine documentation of landfill gas control operations and source testing, but they also document new or unique developments at the site that can have an effect on air emissions. In 2009 there were several such developments:

- An extended power outage at the site caused most or all landfill gas control equipment to be shut down for several days in March of 2009. The ALRRF sought a variance from the BAAQMD for this incident, and that variance was granted.
- Source tests of each of the internal combustion engines that produce electricity from landfill gas led to their temporary shutdown for evaluation or correction of apparent exceedances of permit limits. After adjustments as needed, each engine was retested, passed, and placed back into service within about one month of its shutdown.
- Over 50 new landfill gas wells were installed and placed into service. We developed a schematic diagram and several illustrations of the locations of these wells. These are part of the September 2009 CMC Agenda packet.
- Construction of the LNG plant was begun. The plant was placed into service in August, 2009.

As part of our review we developed a stacked-bar chart showing the day-by-day consumption of landfill gas by each of the major pieces of LFG control equipment. That bar chart was included in the September 2009 CMC Agenda packet.

2.2.4 Monthly Tonnage Reports

Each month the ALRRF provides a report to County Planning and other interested parties, providing several tables detailing the quantities of materials received in that month. We reviewed 12 such reports, covering each month of 2009. All of these reports indicated compliance with the requirements of permits and the Settlement Agreement. In addition, the following points were noted:

- Refuse tonnages were well below EIR / CUP limits. They were on a decreasing trend throughout the year.
- The monthly quantities of special wastes, particularly Class 2 cover soil, and biosolids, varied widely. Biosolids in particular showed more variation than in 2008, with some high-volume months between June and December 2009.
- Monthly tonnages of Class 2 cover soil, had tended to increase during 2008, but this trend was reversed in 2009.
- Various categories have been created for materials other than refuse, to support the tracking of materials used as alternative daily cover, as soil amendment on outside slopes, and for other specialized applications that are subject to limitations or are of special interest to regulatory agencies.

2.2.5 Storm Water Annual Report, 2008-2009

This report provided a record of stormwater monitoring that took place during the most recent "water year", from July 1, 2008 through June 30, 2009. It includes results from the water quality sampling that is required when there are discharges from the three stormwater detention basins (denoted A, B and C) to local drainages. In the first storm event with discharges (January 2009), only Basins A and B discharged; both were sampled. In the second event for which sampling was required, all three basins discharged and were sampled.

Although testing found slightly elevated concentrations of zinc, total suspended solids, nitrate, and iron, these values were all less than in the previous year, when some extremely high values occurred due to erosion damage in several drainage areas. Repairs and improvements in those areas appear to have had a direct beneficial effect on discharge water quality.

2.2.6 Plant Debris Ordinance Compliance Plan

The ACWMA passed an ordinance in early 2009 banning plant debris from landfills and establishing a time line for doing so. This included preparation of Compliance Plans by each disposal site and hauler serving the County. We received and reviewed the final version of the Compliance Plan for the ALRRF. It appears to be consistent with the Ordinance and compatible with ongoing operations at the site.

2.2.7 Landfill Gas Probe Installation Report

Recent changes in regulations have required many landfills to upgrade their landfill gas perimeter detection system; the ALRRF is one such facility. New landfill gas probes were installed in October 2009, around the perimeter of the entire area permitted for refuse disposal (Fill Areas 1 and 2), at a spacing of 1000 feet. In November 2009, we received and reviewed a copy of the Landfill Gas Probe Installation Report prepared by GeoTrans, Inc., dated November 13. This

report satisfactorily documents the installation of the required probes, and it explains why three of the probes could not be installed.

2.2.8 Summary

In our review of received reports, we raised concerns about groundwater monitoring calculations, and Waste Management has been responsive to these concerns. In general, our reviews to date have found no indication of non-compliance.

2.3 Site Inspections

Twelve on-site inspections were held during 2009. To obtain the best possible understanding of the range of operating conditions, the inspection day and time, and certain other aspects of these inspections, were varied as shown in the table below.

Table 2-1
Site Inspection Summary

Date	Day of Week	Inspection Time	Announced In Advance?	With LEA staff?	Topic Emphasized
26 Jan 2009	Thurs	8 AM	No	No	Stormwater controls
19 Feb 2009	Thurs	10 AM	Yes	No	General operations
12 Mar 2009	Thurs	10 AM	Yes	Yes	LNG plant construction
23 Apr 2009	Thurs	9 AM	Yes	No	Scale house; litter
28 May 2009	Thurs	6 PM*	Yes	No	After hours refuse handling
11 Jun 2009	Thurs	1:30 PM	No	Yes	Landfill gas systems
16 Jul 2009	Thurs	9 AM	Yes	Yes	General operations; litter
3 Aug 2009	Mon	6 AM*	Yes	No	Refuse placement/compaction
22 Sep 2009	Tue	6 AM*	Yes	No	Wet weather preparation
15 Oct 2009	Thurs	2 PM	No	Yes	General ops; storm damage
11 Nov 2009	Wed	8 AM	Yes	No	Storm repairs; storm basins
8 Dec 2009	Tues	9 AM	Yes	No	LFG wells; final height

In general, satisfactory conditions were observed, and minor problems were rectified prior to the next inspection. There were no observed problems regarding refuse placement, public safety or traffic management. Throughout these inspections, staff and management were candid and forthcoming regarding operating practices and current conditions. Distinct operations, such as the stockpiling and processing of specific materials, take place in well defined areas. No instances of unpermitted activities were noted outside of the lined portion. This year our primary concerns from inspections have been:

- Windblown litter, primarily plastic bags, carried onto lands (within the landfill property) east of the site. This issue can be expected to become more problematic as the height of Fill Area 1 continues to increase.
- Litter on the perimeters of the three stormwater basins. This issue has been remedied as part of compliance with revised Waste Discharge Requirements.
- One instance of severe erosion due to extremely heavy precipitation (October 2009). Rainfall caused overtopping of several catch basins on the south face of the completed portion of the landfill. Erosion was severe, but no refuse was exposed. This damage was promptly repaired.

We also observed the following:

- In June 2009, night-shift hauling from the Davis Street Transfer Station was discontinued, and crew sizes were adjusted to accommodate this change in the incoming traffic pattern.
- In August 2009, LNG plant construction was completed and operations began.
- Also in October, unusual winds caused litter to be blown onto property to the north of the site. This problem was promptly remedied – the litter was collected.
- In the latter part of 2009, the ALRRF constructed a "drop and hook" trailer parking area near its scale house, where transfer truck drivers may leave a full trailer and immediately depart with an empty one, saving a significant amount of time. The full trailers are to be maneuvered for unloading using an on-site truck tractor.

The Scope of Work for the Community Monitor specifies that at least three inspections will be performed off hours, and that approximately four to six are to be performed jointly with the LEA. As shown in the table above, three off-hour and four joint inspections were conducted in 2009.

One aspect of each inspection is to review inspection reports filed by the Local Enforcement Agency. Four rather unique items were recorded by the LEA in 2009:

- High concentrations of landfill gas occurred at the old gas detection probe closest to the maintenance shop. (Probe was replaced by new probe system)
- Windblown litter occasionally crossed the property lines to the east and to the north of the site. (Litter crews attended to these issues)
- There was one instance of insufficient cover on refuse. (This was rectified.)
- Fence around the asbestos area had been repositioned and needed to be put back in its correct location. (This was rectified.)

We also review the Log of Special Occurrences during inspections. In 2009, there were far fewer incidents of end-dump trucks overturning while unloading. Several small, localized fires occurred and were quickly extinguished by on-site staff. One fairly serious vehicular accident occurred on the road between the site entrance and the scale house, when a departing semi truck overturned and collided with an incoming private vehicle (SUV). Both drivers had minor injuries, were taken to the hospital, treated and released. Also, in late 2009, at the tire-processing firm located on site, a terminated employee became violent; the Sheriff's Department dealt with the situation.

In addition to the on-site inspections, counts of arriving refuse trucks were conducted semiannually by the CM in January and July of 2009. These counts continued to be far below the limit stipulated in the CUP. The CMC has directed the CM to limit these counts to semiannual events in the future, increasing to quarterly when refuse currently disposed at the Tri-Cities landfill begins to be transferred to the ALRRF.

2.4 Class 2 Soils File Review

The ALRRF is permitted to accept Special Wastes that include soils from sites known to be contaminated, if a waste profile and applicable laboratory reports indicate that these soils comply with the landfill's Waste Acceptance Criteria. The profile information is kept on file in the administration offices of the landfill. These soils are generally referred to as Class 2 Cover Soils.

Treadwell & Rollo conducted file reviews to verify that Class 2 Cover Soil profiles for soils received in 2009 follow Waste Acceptance Criteria as defined in the Regional Water Control Board order governing the ALRRF. Treadwell & Rollo conducted four Class 2 Cover Soil file reviews on 2 March, 1 June, 14 September, and 14 December 2009. Treadwell & Rollo personnel reviewed a total of 191 Class 2 Cover Soil files in 2009.

Based upon file reviews completed in 2009, ALRRF is following Waste Acceptance Criteria as defined in the Regional Water Control Board order governing the Site. Also, Treadwell & Rollo personnel had discovered that some documentation was missing from eight of the 360 Class 2 Cover files reviewed, approximately 2% of the total number of files reviewed. During subsequent reviews in 2009 Treadwell & Rollo verified that this documentation was added to the 2008 files.

Treadwell & Rollo will continue to conduct quarterly file reviews during 2010. The frequency of review events may be adjusted depending on the number of new profiles approved for disposal at ALRRF.

SECTION 3
Looking Ahead: Anticipated Efforts and Issues

3.1 Introduction

In the 2010 contract year, our efforts will continue to focus on report review, site inspections and Class 2 soils file review. However, there may be a change of emphasis if the ALRRF completes permit negotiations for the development of Fill Area 2. If that occurs, we also expect to spend time reviewing submitted plans for Fill Area 2.

3.2 Issues to be Tracked in 2010

3.2.1 Report Review Work

With regard to report review, the following issues will continue to be monitored in the coming year:

- Groundwater monitoring methods.
- Groundwater quality, including the vadose zone.
- Stormwater quality and management practices.
- Performance of new gas probe network; resolution of probes not yet installed.

3.2.2 Site Inspection Work

With regard to site inspections, all operations will continue to be observed, and the following areas will receive emphasis.

3.2.2.1 Landfill Gas Control System

Performance of this system is closely related to groundwater quality, and it takes place within a complex regulatory framework involving Federal permits, local permits, new State regulations, and ALRRF CUP conditions. Physical changes to this system will include completion of landfill gas extraction wells and ongoing operation of the LNG plant. Early indications of possible high concentrations at one of the new probes will need to be followed.

3.2.2.2 Stormwater Controls and Monitoring

During wet weather months we will monitor conditions at all stormwater basins.

3.2.2.3 Windblown Litter

This will continue to be an issue as filling takes place on the highest parts of Fill Area 1.

3.2.2.4 New or Modified Operations

For example, the new drop and hook area may have an effect on traffic flow by enabling some trailers to be emptied during “off-peak” hours. Also, as less plant debris is used on site, the use of

alternate materials (such as auto shredder fluff for solidification of liquid wastes) may impact other operations, or stormwater quality.

3.2.3 Class 2 Soils File Review

As noted above, we intend to spread our review across the entire year by reviewing the files in several subsets.

3.3 Project Management Considerations

The budget for the CM in the 2009 contract year has been adequate and has enabled us to focus closely on several areas, including groundwater monitoring, landfill gas control and Class 2 soils file review. Budget should be adequate for work load in 2010, but document review related to the development of Fill Area 2 could require some extra care in managing time and prioritizing work to stay within budget. The current contract with the CM ends at the end of 2010; it may be extended or a Request for Proposals may be issued.