# ANNUAL REPORT OF COMMUNITY MONITOR

Prepared for Altamont Landfill Community Monitor Committee January 3, 2012







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# **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, referred to as the Community Monitor (CM).

The CM's scope of work is defined in a contract between the CM and the CMC, and the Settlement Agreement also defines the purview of the CMC and the CM. 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 inspect the ALRRF site no more than once a month.

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 management 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 part of 2007.

In mid 2007, the CMC selected the current CM team of Environmental Science Associates and Treadwell & Rollo. This team began work in February 2008. From 2008 through 2010, report reviews, reviews of Class 2 soil analysis files, and site inspections were carried out as intended. In 2008, the primary issue of concern was the rate at which groundwater monitoring wells were purged during sampling. This was resolved satisfactorily. In 2009, the CM team took a close look at the methodology used by ALRRF and its consultants to track variations in groundwater quality. No issues or areas of concern arose as a result of this effort; the team was satisfied that the method conforms to regulatory requirements and is conservative. In 2010, landfill gas monitoring was a key issue: new perimeter probes were installed to comply with new regulations, and one of those probes detected landfill gas at levels that exceeded regulatory limits. This was abated by installing several gas wells close to those probes (but still within refuse) to intercept the gas that was migrating toward the perimeter there.

## 1.3 Overview of Operations, Regulations and Permits

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 at the ALRRF:

- Wastes are covered to control litter, prevent fire, and prevent the spread of disease.
- Wastes are placed and compacted to be physically stable.
- Plant debris is not to be disposed; if received, it must be separated and reclaimed by composting or other methods.
- 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 and 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;
- using contaminated soils and other wastes (biosolids, MRF fines<sup>1</sup>, treated auto shredder fluff) as cover material, as permitted;
- stockpiling construction and demolition materials for processing elsewhere;
- providing an area for the separation of plant debris from other wastes, to avoid landfilling plant debris; 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) in the near future. In 2010, the last major permits for the development of Fill Area 2 were obtained. Construction of Fill Area 2 may begin in 2012, although the need for Fill Area 2 may be less immediate if disposed tonnage continues to diminish. Also, the recent approval of design revisions for the final contour of Fill Area 1 has increased that Area's capacity, further increasing the expected lifetime of Fill Area 1.

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<sup>&</sup>lt;sup>1</sup> MRF fines: Fine material produced by a waste sorting system that processes construction and demolition debris at the Davis Street Transfer Station. The coarser fraction of this material (size range 3/8 inch to 2 inches) is brought to the ALRRF to be blended with certain liquid wastes, in a process known as "solidification", and used as Alternative Daily Cover (ADC).

#### 1.3.1 Industry Trends

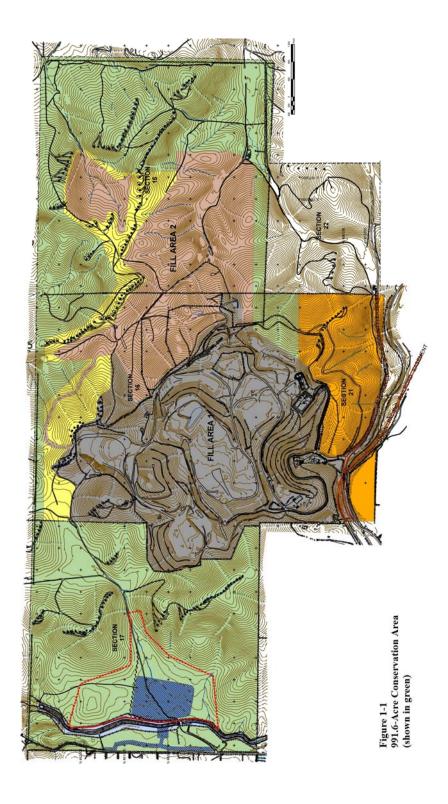
Trends in the landfill disposal industry within the greater Bay Area have affected, and will continue to affect, operations and future developments at the ALRRF:

- The recession, and ongoing efforts to reduce waste and increase recycling, have contributed to a downward trend in disposal tonnages.
- There are no new landfill sites currently in development in the region, and two sites (West Contra Costa, Tri-Cities) have closed in recent years or are in the process of closing. However, on a regional basis there appears to be adequate capacity for refuse disposal in the short to medium term (through the year 2020).
- Another trend in the industry, long-distance rail-haul of refuse, may have an effect on the ALRRF site in the future. The City of San Francisco is in the process of negotiating for the subsequent rail haul of its wastes to Ostrom Road Landfill, in Yuba County. It appears possible that San Francisco refuse will cease to be delivered to the ALRRF in 2014 or 2015.

## 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 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. This last issue has been resolved; as shown in Figure 1-1, a 991.6-acre Conservation Plan Area has been delineated, and plans for its development and management will be provided in conjunction with the development of Fill Area 2.



Section 1 - Introduction

Local policies and needs are likely to result in further changes. The Alameda County Waste Management Authority and Recycling Board (Stopwaste.Org) goal of 75% waste diversion is continuing to decrease waste flows into the ALRRF, most recently through a ban on plant debris disposal. 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. Furthermore, with the signing of State Assembly Bill 341 in October 2011, recycling programs with a 75% diversion goal are now mandatory for commercial businesses and most multifamily buildings, statewide. Stopwaste.Org is developing ordinances to ban single-use bags and to reinforce AB 341's mandatory recycling requirements. These waste diversion efforts represent a constraint to the extent that they limit the flow of refuse to the ALRRF, but they are also an opportunity for the ALRRF to (a) reduce its litter cleanup effort if the bag ban has a material effect, and (b) provide processing of recyclables in a MRF that may be developed at the landfill in the future.

Several other recent site-related developments may be viewed as constraints or opportunities:

- The ALRRF is seeking a change to the Conditional Use Permit for the site, to allow development of composting and recyclables-processing facilities. The CEQA review for these permit changes was completed in August 2011.
- Construction of a reservoir by the California Department of Water Resources on the western side of the property concluded in 2011, and repair work on nearby canals continued; in the short run this limits the ALRRF's access to raw water, requiring the use of a pond on site as a raw water reservoir.
- A truck fueling facility is being added to the LNG plant at the site.

## **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.

Throughout the year 2011, the CM was active in each of these areas, as described in Sections 2.3 through 2.6 below.

# 2.1.1 Operational Improvements and Changes

Through report reviews and site visits, several new developments in ALRRF facilities and operations in 2011 became apparent:

- The LNG plant and its associated flare, which came on line in 2010, continued to operate and gradually increased production as troubleshooting and equipment upgrades were carried out.
- Additional landfill gas wells were brought on line in one round of installation, in midsummer of 2011.
- Continued monitoring of perimeter landfill gas probes found no exceedances of regulatory thresholds, indicating that the four wells which had been installed to mitigate high gas concentrations at one probe on the west side of Fill Area 1 continued to operate successfully.
- One landfill gas well that began to produce gas at unusually high temperatures was shut down, was managed to prevent the start of an underground fire, and was eventually decommissioned.
- As refuse handling shifted to the west side of Fill Area 1, windblown litter to the east (downwind) of Fill Area 1 was reduced; however, later in the year, when filling resumed on the east side of the site, windblown litter again began to accumulate downwind. Later in the year, strong north winds caused litter to begin to migrate southward, especially during a high-wind event in early December. In response, ALRRF has added several cleanup crew members and installed an additional litter fence. Portions of the litter fencing system can be, and are, moved in response to changes in wind direction.
- The site's Plant Debris Ban Compliance Plan was modified to allow for a separation area at the landfill, so that mixed loads (those containing some C&D) could be received and the plant debris managed separately; and this practice has begun.

# 2.2 Compliance

The Settlement Agreement describes the CM's Scope of Work to include "issuing a written report each year summarizing the ALRRF's compliance record for the period since the last such report with respect to all applicable environmental laws and regulations." This Annual Report provides that summary. In 2008 and 2009 there were no violations or substantial out-of-compliance conditions to report.

In 2010, the continuing presence of high levels of landfill gas at one of the newly-installed perimeter probes led to the recording of a Violation in the Local Enforcement Agency's inspection reports, from January 11 through May 20, 2010. The May 27 inspection report states that the problem was remediated and "... Compliance ... has been achieved."

Beginning in June of 2011, the presence of refuse in MRF fines² was noted by the LEA, and a Notice of Violation was issued at the LEA's September 23 inspection. This was followed by a September 29 letter from the LEA directing the ALRRF to stop using MRF fines in solidification, improve load checking, and ensure that processed C&D material used for ADC will not contain refuse. The letter provided 30 days to correct the violation. On October 24, ALRRF provided a response which describes how MRF fines are produced, sized and used; and which points out that this issue began at about the same time as the startup of a new C&D-material sorting system at the Davis Street Transfer Station. This response also proposed to limit contamination to no more than 10% plastic and paper, and to meet the other requirements of the Notice of Violation. At this writing (March 2012) the LEA has stated that they consider the violation to be remedied. LEA inspection reports noted contaminants in MRF fines through October 14, but not thereafter.

# 2.3 Review of Reports

## 2.3.1 Semiannual Groundwater Monitoring Reports

Two groundwater monitoring reports were reviewed in 2011. The first covered the time frame from July through December of 2010; the second, January through June of 2011. Both reports reflect revised Waste Discharge Requirements issued by the Central Valley Regional Water Quality Control Board that took effect in April of 2009.

In 2011 as in previous years, groundwater monitoring and sampling activities at the ALRRF were performed by SCS Engineers, with testing conducted by TestAmerica, Inc. Treadwell & Rollo, Inc. reviewed the two semi-annual groundwater monitoring reports and prepared memoranda to summarize their review comments. One noteworthy occurrence was that well E-20B, which has had detectable amounts of vinyl chloride and other volatile organics in its samples for the past several years, had a "not detected" result for vinyl chloride in the first half of 2011.

In general, groundwater quality in the area varies, both by location and over time; without an obvious trend it is difficult to attribute quality problems to the landfill or any other specific cause.

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<sup>&</sup>lt;sup>2</sup> MRF fines: Fine material produced by a waste sorting system that processes construction and demolition debris at the Davis Street Transfer Station. The coarser fraction of this material (size range 3/8 inch to 2 inches) is brought to the ALRRF to be blended with certain liquid wastes, in a process known as "solidification", and used as Alternative Daily Cover (ADC).

At this time the recommended course of action is to continue to review monitoring results and watch for trends.

Water testing in 2011 included the five-year "Constituents of Concern (COC)" series of tests that look for certain substances not included in the semiannual testing. In general, these substances are less likely to occur than the semiannual monitoring parameters; but they are potentially harmful to water quality in very low concentrations. The COC series calls for tests at both groundwater wells and at stormwater basins. In groundwater, unusually high concentrations of arsenic and antimony were found; but these may have been naturally occurring, since those elements do occur naturally in soils in the region. At the stormwater basins, several organic compounds were detected at very low concentrations, so retests are planned to confirm these occurrences.

Finally, it should be noted that the number of analysis errors (e.g., positive detections in blank samples) was lower this year than in 2010.

## 2.3.2 Annual Mitigation Status Report

The Mitigation Status Report covering calendar year 2010 was received in January 2011. It is a table that lists each of the 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.

#### 2.3.3 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 applicable air quality regulations. Hence, the Title V reports provide a comprehensive review of compliance with BAAQMD permits and regulations.

In 2011, we received the Title V reports for the periods June – November 2010, and December 2010 – May 2011. 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 2011 there were several such developments:

- Approximately 20 new landfill gas wells were installed and placed into service.
- Surface emissions exceedances were greatly reduced from the previous year. Also, the new protocol for surface emissions testing was used, with good results.
- The LNG plant continued to operate, and unscheduled down-time was gradually reduced.

As part of our review we updated 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 April 2011 and October 2011 CMC Agenda packets.

One rather unique event that was documented in the Title V reports was the shutdown, cooling, restart and eventual decommissioning of a well that was showing temperatures so high that the risk of an underground fire was significant. This situation was properly managed and had a

positive outcome – no fire occurred. During this reporting period, the five gas wells closest to the problem well remained in service except for brief (part-day) maintenance outages, and no gas leakage was found in the vicinity during surface emissions monitoring; the adjacent wells appeared to be adequate for all gas produced in the vicinity.

#### 2.3.4 Monthly Tonnage Reports

Each month the ALRRF provides a report to County Planning and other interested parties, containing several tables that detail the quantities of materials received in that month. The most recent 12 reports cover December 2010 through November 2011. All of these reports indicate 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 exhibited a gradually
  decreasing trend throughout the year, possibly leveling off in the last few months of
  2011.
- Once again, the monthly quantities of special wastes, particularly Class 2 cover soil, and biosolids, varied widely. In 2011, no biosolids were delivered to the ALRRF until September.
- Monthly tonnages of Class 2 cover soil were small through most of 2011 but were very large in October and November.

## 2.3.5 Storm Water Annual Report, 2010-2011

This report provided a record of stormwater monitoring that took place during the most recent "water year", from July 1, 2010 through June 30, 2011. 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 two storm events with discharges that could be sampled (both in February 2011), only Basin C could be sampled in the first event, and only Basin A in the second. Basin B could not be sampled at all in this water year.

Testing found slightly elevated concentrations (above benchmark values) for iron, zinc, total suspended solids, and chemical oxygen demand in Basin C, and all parameters below benchmark levels in Basin A. This is an improvement over the previous year. Nevertheless, to address the exceedances, Best Management Practices have been further augmented in the 2011 Winterization Plan.

#### 2.3.6 Regional Water Board Site Visit and Memo

In May of 2011, staff of the RWQCB visited the site and examined the groundwater and stormwater protection systems. They transmitted a memorandum to the ALRRF, indicating their concern in two areas: the amount of silt and vegetation in some drainage ditches (particularly those that were fabric lined), and dead vegetation on one of the upper slopes of the landfill. (Vegetation such as grasses on landfill slopes can aid in preventing erosion.) ALRRF staff have cleaned all of the ditches that exhibited the siltation. The dead vegetation problem is difficult to address because the climate at the site causes most grasses to die back in the summertime.

#### 2.3.7 Summary of Report Reviews

Our reviews of received reports have not identified any issue that would indicate an immediate increase in risk to environmental or public health. We continue to believe that it is prudent to track changes in the concentrations of contaminants in groundwater, to note any problems with landfill containment systems as soon as possible. No such problem is believed to exist at this time.

# 2.4 CEQA for Proposed Use Permit Changes

As noted above, the ALRRF is seeking changes to its Conditional Use Permit to add facilities for the composting of organic wastes and the sorting of mixed recyclables. The formal CEQA review of the desired changes took the form of a Mitigated Negative Declaration; the review period was July 13 to August 11, 2011. The state Clearinghouse number for this review is 2011072021.

# 2.5 Site Inspections

Twelve site inspections were held during 2011. To obtain the best possible understanding of the range of operating conditions, the inspection day and time were varied as shown in the table below.

Table 2-1 Site Inspection Summary

Date	Day of	Inspection	Announced	With LEA
	Week	Time	in Advance?	staff?
Jan 19	Weds	2:30 PM	no	yes
Feb 24	Thurs	9 AM	yes	no
Mar 31	Thurs	9 AM	yes	no
Apr 28	Thurs	3 PM	yes	no
May 12	Thurs	5 AM	yes	no
Jun 20	Mon	2 PM	yes	no
Jul 26	Tue	4 PM	yes	no
Aug 15	Mon	2 PM	no	yes
Sep 12	Mon	6 PM	yes	no
Oct 19	Weds	2:30 PM	yes	no
Nov 16	Weds	2:15 PM	yes	no
Dec 10	Fri	8:30 PM	yes	no

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 forthcoming regarding operating practices and current conditions. Distinct operations, such as the stockpiling and processing of specific materials, took place in well defined areas. No instances of unpermitted activities were noted.

In 2011 our observations focused on:

- Storm drainage and erosion control, including the installation and performance of stormwater Best Management Practices
- Traffic on site, and the adequacy of crews and equipment to handle incoming traffic and waste volumes
- General observations of fill activities, including spreading, compaction and traffic control during normal and off-hours operations
- Observation of issues of concern, including the condition of ditches (as noted in the June memorandum from the RWQCB) and the presence of contaminants in MRF fines.
- Management of windblown litter, which is an ongoing problem as Fill Area 1 approaches its maximum height.

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 two joint inspections were conducted in 2011.

One aspect of each inspection is to review available inspection reports filed by the Local Enforcement Agency. Through early November 2011, the LEA reports made note of one violation (refuse in MRF fines, described above) and several Areas of Concern:

- April 14: Erosion exposed a minor amount of waste, which should be covered promptly.
- May 20: South slope not adequately covered; apply more cover.
- June 9: MRF fines being used as road base; not a permitted use of this material.
- June 16: Litter along Altamont Pass Road, both sides.
- July 21: Unapproved use of MRF fines as cover at gas well.
- August 26: MRF fines appear to be heavily contaminated with refuse.
- October 7, 14: Erosion control cover appears heavily contaminated with refuse.
- October 27: Roadway construction has exposed buried waste. LEA not notified in advance.

We also review the Log of Special Occurrences during inspections. In 2011, there were minimal Special Occurrences until the latter part of the year, when several end-dump trucks bringing various materials (treated auto shredder waste, Class 2 soils, biosolids) fell over while unloading, and two hauling trucks collided more or less head-on, on the main road at the landfill. Fortunately, no serious injuries occurred in these incidents. Two small, localized fires occurred (one on a truck, and one on the landfill); both were quickly extinguished by on-site staff. Several minor injuries to employees were also reported, none of which required an emergency response.

In addition to the on-site inspections, counts of arriving refuse trucks were conducted by the CM in January, July and December of 2011. These counts continued to be well below the limit stipulated in the CUP.

#### 2.6 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 2011 follow Waste Acceptance Criteria as defined in the Regional Water Control Board order governing the ALRRF. Treadwell & Rollo conducted three Class 2 Cover Soil file reviews, in January, May and October of 2011. Treadwell & Rollo personnel reviewed a total of 161 Class 2 Cover Soil files in 2011. All of those files were found to be complete and in compliance with Class 2 acceptance criteria.

Based upon file reviews completed in 2011, ALRRF is following Waste Acceptance Criteria as defined in the Regional Water Control Board order governing the Site. Treadwell & Rollo will continue to conduct quarterly file reviews during 2012. 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 2012 contract year, our efforts will continue to focus on report review, site inspections and Class 2 soils file review. As Fill Area 1 nears completion, operations will become more complex in order to control the final height and shape of the filled area. Also, if the ALRRF begins the development of Fill Area 2, we expect to spend time reviewing submitted plans for Fill Area 2, as well as mitigation plans for the Conservation Plan Area.

#### 3.2 Issues to be Tracked in 2012

#### 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 landfill gas handling equipment.
- Additional changes to the landfill gas extraction system.
- Surface emissions monitoring under new regulations.

## 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 the further addition of landfill gas extraction wells and ongoing operation of the LNG plant, as well as startup of the LNG truck fueling system.

#### 3.2.2.2 Stormwater Controls and Monitoring

Throughout the year, and especially during wet weather months, we will monitor conditions at all stormwater basins.

#### 3.2.2.3 Windblown Litter

As noted above, this will be an issue for Fill Area 1, which is generally higher than its immediate surroundings and subject to strong winds through much of the year.

#### 3.2.2.4 Fill Area 2

If physical preparations or development occur in Fill Area 2, we will ask to observe these operations. If mitigation plans regarding the Conservation Plan Area or the Conservation Easement are submitted to a regulatory agency, we will review them to the extent required by the Settlement Agreement.

#### 3.2.3 Class 2 Soils File Review

As required in our Scope of Work, we intend to continue this review at several times through the year 2012.

# 3.3 Project Management Considerations

The budget for the CM in the 2011 contract year has been adequate. Budget should be adequate for work load in 2012, but the development of Fill Area 2 (if it occurs) could require some extra care in managing time and prioritizing work to stay within budget.

The shift from bimonthly to quarterly meetings of the Community Monitor Committee has reduced the number of meetings per year from 6 to 4 but otherwise has not had an effect on the work load for the Community Monitor. Due to the semiannual reporting cycles for air and water related issues, the April and November meetings have been, and will continue to be, more intensive than the January and July meetings.