

ALRRF COMMUNITY MONITOR ANNUAL REPORT 2012

Prepared for
ALRRF Community Monitor Committee

January 16, 2013



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550 Kearny Street
Suite 800
San Francisco, CA 94108
415.896.5900
www.esassoc.com

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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 Settlement Agreement defines the purview of the CMC and the CM. The CM's scope of work is further defined 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 inspect the ALRRF site no more than once a month. 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 for 2012.

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 2012, the team has carried out report reviews, Class 2 soil analysis file review, and site inspections 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. In 2011, it became apparent that fine material¹ from the Davis Street Material Recovery Facility (MRF), used as Alternative Daily Cover, was beginning to include some municipal solid waste materials, such as plastics from consumer goods. This issue continued into 2012 and is discussed further in Section 2.3 below.

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. Currently it is back-hauled to the Davis Street facility for processing and eventual use as compost or biomass fuel.
- 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 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, treated auto shredder fluff) as cover material, as permitted;
- stockpiling construction and demolition (C&D) 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,

¹ 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 and blended with certain liquid wastes, in a process known as "solidification", and used as Alternative Daily Cover (ADC).

the last major permits for the development of Fill Area 2 were obtained. Construction of Fill Area 2 may begin in 2013, though the need for Fill Area 2 may be less immediate if disposed tonnage continues to diminish. Also, design revisions in 2010 for the final contour of Fill Area 1 increased its capacity, further increasing the expected lifetime of Fill Area 1. At this time no further environmental review is expected to be necessary for disposal to begin in Fill Area 2; but if anticipated composting and material recovery processes are developed, those are likely to require environmental review for compliance with the California Environmental Quality Act.

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 economic recession, and ongoing efforts to reduce waste and increase recycling, have contributed to a downward trend in disposal tonnages. Although the recession currently appears to be ending, disposed tonnages at ALRRF do not appear to be increasing.
- 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, at least through the year 2035.²
- Three recent efforts to increase disposal capacity for the region have met with opposition that makes their outcome uncertain.
 - The City of San Francisco is in the process of negotiating for the rail haul of its wastes to Ostrom Road Landfill in Yuba County. The City approved the plan, but due to opposition a full environmental review will be required prior to any further action.
 - In December 2012, the proposed Potrero Hills Landfill expansion in Solano County was dealt a setback when a judge overruled the issuance of a key permit from the Bay Conservation and Development Commission.
 - Redwood Landfill near Novato also faced opposition to the adoption of the mitigated alternative in its Environmental Impact Report for its planned expansion. A court ruling has set aside the EIR and the associated solid waste facility permit. The County may either appeal or begin to explore other landfill options in the Bay Area, including Keller Canyon Landfill in Contra Costa County and Central Landfill in Sonoma County.

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

² This estimate is based on a simple and conservative set of calculations assuming steady growth in population, no increase in diversion, the continued delivery of San Francisco refuse to the ALRRF, and the ability for some regional disposal sites to receive all materials when other facilities reach their present capacity.

establishes the CMC and the CM role, as described above; and establishes 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 led to the eminent-domain condemnation of 34 acres of the landfill property for use as a reservoir by the California Department of Water Resources. This has complicated the ALRRF's efforts to comply with a Use Permit requirement for 750 acres to be set aside for a biological habitat mitigation and buffer area, but this last issue has been resolved; 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.

Local policies and needs will likely result in further changes at the ALRRF. 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 countywide ban on plant debris disposal. Stopwaste.Org is also promoting efforts in many local jurisdictions to divert more organics, including food scraps, into composting rather than landfill disposal. In addition, Stopwaste.Org has developed, and most of its member agencies have adopted, a single-use bag ban ordinance and a local mandatory commercial recycling ordinance to reinforce AB 341, the state mandatory recycling law enacted in October 2011³. These waste diversion efforts represent a constraint because 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 developments present new opportunities and/or constraints:

- The ALRRF is seeking a change to its Conditional Use Permit, to allow development of composting and recyclables-processing facilities.
- In 2011 the California Department of Water Resources completed construction of a reservoir on the western side of the property. One result has been an increase in the number of seagulls present at the landfill; they appear to be using the reservoir as a dwelling area and the landfill as a food source.
- A truck fueling facility has been added to the LNG plant at the site; it will become operational when required fire protection measures are fully installed.
- The City of Oakland has issued Requests for Proposals for refuse and recycling collection and disposal services. This could lead to the disposal of Oakland refuse at a different landfill in the future.

³ AB 341 requires that all California businesses (including public entities) that generate four cubic yards or more of commercial solid waste per week or are a multifamily residential dwelling of five units or more shall arrange for recycling services.

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 2012, the CM was active in each of these areas, as described below.

2.2 Operational Improvements and Changes

Through report reviews and site visits, several new developments in ALRRF facilities and operations in 2012 became apparent:

- **Additional landfill gas wells** were brought on line in one round of installation, in mid-summer of 2012.
- **Traffic Director protection.** The Davis Street Transfer Station is operated by Waste Management and is the source of much of the refuse that is delivered to the ALRRF. In June of 2012, fatal injuries to a traffic director at the transfer station prompted additional protective measures for workers performing similar tasks at the ALRRF. A highly visible metal enclosure was constructed to provide a "safety zone" for traffic directors while near the unloading area at the landfill.
- **Intensified bird deterrence.** Additional operations staff were trained and qualified in the use of bird scare cartridge guns, and the use of the two propane bird cannons on site was increased. Both of these devices use loud noises to startle birds and interrupt their normal activities.
- **Relocation of leachate truck fill station, and installation of secondary containment berm.** After the leachate spill described below in Section 2.3.2, by July 2012 the fill station had been relocated roughly ½ mile to the north, well within the Class 2 portion of Fill Area 1. In addition, the controls for the pump for this operation were changed to a timer with automatic shut-off, and a berm was built immediately downslope of the truck parking area to capture and contain any spill that might occur. Subsequently, a test of the bermed containment area found that it has more than enough capacity to contain an entire truckload of liquid.

- **Improvements to Stormwater Basin B and upslope drainage structures.** Upslope of Basin B, a concrete-lined v-ditch discharges onto a sloping ground surface that is protected with rock to diffuse flow and prevent erosion. In the past, high flows in the v-ditch have escaped the ditch before reaching its end, causing significant soil erosion. (This area is on native soil, not refuse.) To address this problem, in 2008 a section of concrete K-rail was placed along the outboard edge of the v-ditch to help contain overflow. This was not a complete success, but the K-rail has been repositioned and extended, and additional rock has been placed to limit further erosion. Additional improvements to the basin itself were prompted by the leachate spill described in Section 2.3.2 below. When the spill occurred, the discharge was moving toward Basin B, so operations staff quickly excavated a “pre-basin” to capture any flow that arrived there in the short term (none did). After the cleanup from the leachate spill was complete, this pre-basin was removed, and sediment was also removed from the inlet side of Basin B. This material was placed on slopes and roads adjacent to the basin, to improve access for stormwater testing and system maintenance.
- **Reduction of litter.** Several rows of fencing, approximately 5 feet tall, were installed downwind of the refuse unloading area and perpendicular to the prevailing wind direction. Additional fencing was added near the perimeter of the unloading area, in concentric rows. Also, grasses and shrubs were trimmed on parts of the top deck of the landfill, to enable the wind to push litter to these fences where it would be collected. Along Altamont Pass road, litter collection crew hours were changes so that they picked up litter every day rather than every other day. All of these measures reduced the amount of loose litter on, and escaping from, the site.
- **Liquefied natural gas (LNG) truck fueling station.** This station, located next to the on-site LNG plant, would provide truck fuel made from landfill gas, for use by suitably equipped refuse collection and/or transfer trucks. The station itself was fully constructed in 2012, but unanticipated Fire Department requirements have led to the installation of a fire protection water tank and piping to serve the fuel station and other parts of the site. Purchase and installation of the water system required additional time and will also require Fire Department inspection and approval after installation is complete. In the interim, the fueling station is not being used.

One further change, less directly related to current operations, is also pending. In discussion, ALRRF staff have mentioned that the facility is seeking revisions to its Conditional Use Permit C-5512 to accommodate certain additional operations that were described in the 2010 revisions to the facility’s Joint Technical Document. Specifically, a material recovery operation (to reclaim recyclable materials) and an on-site composting operation are contemplated. In the October 2012 Committee meeting, ALRRF management mentioned that the proposed changes are under review by the County Fire Department, and when that review is completed, the formal process for revision of the use permit will move forward.

2.3 Compliance and Significant Incidents

As noted above, 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 2012 there was one Violation and several Area of Concern notices issued by the Local Enforcement Agency (LEA). The Violation and several of the Area

of Concern notices were related to the first of the three topics described below. Several other Area of Concern notices indicated thin or missing cover over landfilled refuse; these instances were promptly corrected.

2.3.1 Refuse in MRF Fines

This issue first arose in 2011 when the presence of refuse in MRF fines⁴ was noted by the LEA, and a Notice of Violation was issued at the LEA's September 23 inspection. Subsequently, the ALRRF proposed methods to control the quality of this material, and criteria for acceptability. This issue was not fully resolved, and MRF fines continued to be used. This led to a Notice of Violation from the LEA in January 2012; and the Regional Water Quality Control Board also required the removal of exposed cover containing MRF fines from outside slopes of the landfill by November 2012, unless the testing plan was approved and had shown no potential harm from the MRF fines. At this writing (December 2012), the ALRRF has complied with the Regional Water Board's directive to remove cover containing MRF fines from the outside slopes of the landfill, and the Regional Water Board and the LEA have agreed to consider a proposed test of MRF fines as ADC on a small portion of the landfill.

2.3.2 Leachate Overflow at Truck Loading Station

At the ALRRF, leachate that is extracted from the landfill is stored in an on-site tank and transferred to a pump truck, to be used for dust control. The filling station, near the south edge of the landfill, was a simple overhead pipe that discharged into the open hatch of the tank truck below. On April 24, 2012, a valve was not fully closed after the truck was filled, and leachate spilled onto the ground and began to move toward stormwater basin B. The situation was brought under control before any leachate reached Basin B, but the incident led to several improvements in leachate handling, described in Section 2.2 above. This incident did not result in any Notice of Violation being issued.

2.3.3 Unprofiled Material with High Lead Content

In late October, a transporter notified ALRRF that ten loads of ash brought in the previous day for solidification (mixing with liquid wastes prior to disposal) had been delivered before profiling (testing for hazardous materials) was complete. ALRRF took several steps to contain and remove this material, and to test the remaining soils where the material had been staged, to assure that cleanup had been complete. This incident did not result in any Notice of Violation being issued.

2.4 Review of Reports

2.4.1 Semiannual Groundwater Monitoring Reports

Two groundwater monitoring reports were reviewed in 2012. The first covered the time frame from July through December of 2011; the second covered January through June of 2012. Both reports reflect revised Waste Discharge Requirements issued by the Central Valley Regional Water Quality Control Board that took effect in April of 2009.

⁴ 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 and blended with certain liquid wastes, in a process known as "solidification", and used as Alternative Daily Cover (ADC).

In 2012, 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 the finding and confirmation of low but detectable concentrations of the herbicide 2,4-D during 5-year Constituent of Concern testing of stormwater basins. Because only one Constituent of Concern was found, this did not become a regulatory action, but it does reinforce the need to continue to control stormwater pollution at the site.

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

2.4.2 Annual Mitigation Status Report

The Mitigation Status Report covering calendar year 2011 was received in January 2012. 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.

2.4.3 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 2012, we received the Title V reports for the periods June – November 2011, and December 2011 – May 2012. 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 2012 there were several such developments:

- Approximately 15 new landfill gas wells were installed and placed into service.
- Surface emissions monitoring continued, and although exceedances were found, they were typically remedied on the first try, without the need for repeated attempts or repairs. Also, the protocol for surface emissions testing was modified from a path-based approach to a zonal approach, which will have advantages in identifying problem sites within the landfill.
- The LNG plant continued to operate, and unscheduled down-time was minimal.
- All control devices passed their emissions tests without incident.

2.4.4 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 2011 through November 2012. 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. On average, they stayed at a constant level throughout 2012.
- Once again, the monthly quantities of special wastes, particularly Class 2 cover soil, and biosolids, varied widely. In 2012, biosolids were only delivered to the ALRRF in October.
- Monthly tonnages of Class 2 cover soil were small through most of 2012 but were substantially larger in August through October.

2.4.5 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, 2011 through June 30, 2012. 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. Basins B and C were sampled twice; Basin A only had one discharge event, which was also sampled.

Testing found slightly elevated concentrations (above benchmark values) for:

- Iron, in all three basins
- Zinc, in Basins B and C
- Nitrate, in Basin B

This is consistent with prior years’ measurements but indicates little improvement in spite of ever-increasing efforts to control stormwater pollution. To address the exceedances, Best Management Practices have been further augmented in the 2012 Winterization Plan.

2.4.6 Summary of Report Reviews

Our reviews of the various reports described above 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.

2.5 Monthly Site Inspections

Twelve site inspections were held during 2012. To obtain the best possible understanding of the range of operating conditions, the inspection day and time were varied as shown in Table 2-1 below.

Table 2-1
Site Inspection Summary

Date	Day of Week	Inspection Time	Announced in Advance?	With LEA staff?
Jan 31	Tue	3:30 PM	yes	no
Feb 27	Mon	2:30 PM	yes	no
Mar 14	Wed	9:30 AM	no	yes
Apr 17	Tue	3 PM	no	yes
May 9	Wed	5 PM	yes	no
Jun 27	Wed	6 AM	yes	no
Jul 19	Thurs	8:30 AM	no	yes
Aug 29	Wed	7 AM	yes	no
Sep 18	Tue	2:30 PM	no	yes
Oct 2	Tue	1:30 PM	yes	no
Nov 19	Mon	2 PM	yes	no
Dec 17	Mon	10:30 AM	yes	no

In general, satisfactory conditions were observed, and minor problems were rectified prior to the next inspection. Details are available in the monthly site visit reports provided to Committee members. 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.

2.5.2 Summary of Observations

In 2012 our observations continued to focus 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 increased presence of seagulls and the quality of materials used as Alternative Daily Cover.
- Management of windblown litter, which is improving but is an ongoing problem as Fill Area 1 reaches 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 four joint inspections were conducted in 2012.

One aspect of each inspection is to review available inspection reports filed by the Local Enforcement Agency. Through November 2012, the LEA reports made note of one violation

(refuse in MRF fines, described above) and several Areas of Concern that focused on two issues: refuse in MRF fines, and thin or absent landfill cover.

We also review the Log of Special Occurrences during inspections. In 2012, apart from the leachate spill and unprofiled waste delivery described above, there were minimal Special Occurrences until the latter part of the year, when two end-dump trucks fell over while unloading. Fortunately, no injuries occurred in these incidents. No fires were reported. One minor injury to an employee was also reported; it did not require an emergency response.

In addition to the on-site inspections, counts of arriving refuse trucks were conducted by the CM in December of 2011 and July of 2012. 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 2012 follow Waste Acceptance Criteria as defined in the Regional Water Control Board order governing the ALRRF. All files were found to be complete and in compliance with Class 2 acceptance criteria.

Based upon file reviews completed in 2012, 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 2013. 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 2013 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 2013

3.2.1 Ongoing Report Review

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.
- Reports related to the opening of Fill Area 2, if construction begins.

3.2.2 Site Inspection Work

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 several times through the year 2013.

3.3 Project Management Considerations

The budget for the CM in the 2012 contract year has been adequate. Budget should be adequate for work load in 2013, 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.

At the end of 2013, the current contract for Community Monitor services will reach the end of its term. It appears that a procurement process will need to be conducted in 2013 to select a Community Monitor consultant, if desired.