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VOTING MEMBERS

Robert Carling City of Livermore

Jerry Pentin City of Pleasanton

Donna Cabanne Sierra Club

David Tam Northern California Recycling Association

<u>NON-VOTING</u> <u>MEMBERS</u>

Audrey Lundin Waste Management Altamont Landfill and Resource Recovery Facility

Arthur Surdilla / Wing Suen Alameda County

Robert Cooper Altamont Landowners Against Rural Mismanagement (ALARM)

<u>STAFF</u>

Judy Erlandson City of Livermore Public Works Manager

COMMUNITY MONITOR COMMITTEE Altamont Landfill Settlement Agreement

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

AGENDA

DATE: Wednesday, July 11, 2018

TIME: **4:00 p.m.**

PLACE: City of Livermore

Maintenance Services Center 3500 Robertson Park Road

- 1. Call to Order
- 2. Introductions
- 3. Roll Call
- 4. Approval of Minutes (From April 11, 2018)
- 5. Open Forum This is an opportunity for members of the audience to

comment on a subject not listed on the agenda.

No action may be taken on these items.

6. Matters for Consideration

6.1 Responses to Committee Member Questions:

- Submittal Date for Year 4 Mitigation Report
- Consistency of CUP with USFWS Biological Opinion
- Posting of Documents on Geotracker Web Site
- 6.2 Status of Wetland Mitigation Construction
- 6.3 Five-Year Permit Review (LEA representative)
- 6.4 Review of Reports Provided by ALRRF
- 6.5 Review of Documents on GeoTracker Web Site
- 6.6 Reports from Community Monitor
- 6.7 Announcements (Committee Members)

7. Agenda Building

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

8. Adjournment

The next regular Community Monitor Committee meeting is scheduled to take place at 4:00 p.m. on **October 10, 2018** at 3500 Robertson Park Road, Livermore.

Informational Materials:

- Community Monitor Roles and Responsibilities
- List of Acronyms
- Draft Minutes of April 11, 2018
- Reports from ESA and subcontractors

City of Livermore TDD (Telecommunications for the Deaf) (925) 960-4104

PURSUANT TO TITLE II OF THE AMERICANS WITH DISABILITIES ACT (CODIFIED AT 42 UNITED STATES CODE SECTION 12101 AND28 CODE OF FEDERAL REGULATIONS PART 35), AND SECTION 504 OF THE REHABILITATION ACT OF 1973, THE CITY OF LIVERMORE DOES NOT DISCRIMINATE ON THE BASIS OF RACE, COLOR, RELIGION, NATIONAL ORIGIN, ANCESTRY, SEX, DISABILITY, AGE OR SEXUAL ORIENTATION IN THE PROVISION OF ANY SERVICES, PROGRAMS, OR ACTIVITIES. TO ARRANGE AN ACCOMMODATION IN ORDER TO PARTICIPATE IN THIS PUBLIC MEETING, PLEASE CALL (925) 960-4586/4582 (VOICE) OR (925) 960-4104 (TDD) AT LEAST 72 HOURS IN ADVANCE OF THE MEETING.

The Community Monitor Committee Agenda and Agenda Reports are prepared by City staff and are available for public review on the Thursday prior to the Community Monitor Committee meeting at the Maintenance Service Center, located at 3500 Robertson Park Road, Livermore. The Community Monitor Committee Agenda is available for public review at the Maintenance Service Center, 3500 Robertson Park Road, Livermore, and on the Community Monitor Committee web site, http://www.altamontcmc.org.

Under Government Code §54957.5, any supplemental material distributed to the members of the Community Monitor Committee after the posting of this Agenda will be available for public review upon request at 3500 Robertson Park Road., Livermore or by contacting us at 925-960-8000.

If supplemental materials are made available to the members of the Community Monitor Committee at the meeting, a copy will be available for public review at the Maintenance Service Center, at 3500 Robertson Park Road, Livermore.

Community Monitor Committee Roles and Responsibilities

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

Community Monitor Committee's Responsibilities

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

- A. Interviewing, retaining, supervising, overseeing the payment of, and terminating the contract with the Community Monitor;
- B. Reviewing all reports and written information prepared by the Community Monitor; and
- C. Conferring with the Community Monitor and participating in the Five Year Compliance Reviews (next due in 2015) and the Mid-Capacity Compliance Review (due when the new cell is constructed and capacity is close to 50%, unlikely to occur before 2028) (Condition number 6 of Exhibit A of the Agreement).

Community Monitor's Responsibilities

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

- A. Reviewing any relevant reports and environmental compliance documents submitted to any regulatory agency (sections 5.7.1, 5.7.2, and 5.7.3);
- B. Advising the public and the Cities of Livermore and Pleasanton about environmental and technical issues relating to the operation of the Altamont Landfill via the CMC (section 5.7.4);
- C. Presenting an annual written report summarizing the Altamont Landfill's compliance record for the year to the CMC and submitting the report to Alameda County and the Cities of Livermore and Pleasanton (section 5.7.5);
- D. Notifying the County Local Enforcement Agency and Waste Management of Alameda County of any substantial noncompliance findings or environmental risk (section 5.7.6);
- E. Monitoring and accessing the Altamont Landfill site and conducting inspections (section 5.7.7):
- F. Counting trucks arriving at the Altamont Landfill (section 5.7.8); and
- G. Reviewing waste testing data and source information (section 5.7.9).

Waste Management of Alameda County's Responsibilities

Per the settlement agreement, Waste Management is responsible for:

- A. Paying for the services of the Community Monitor, based on an annual cost estimate (section 5.3.3).
- B. Paying an additional 20% over the annual cost estimate if warranted based on "credible evidence" (section 5.3.3).

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List of Acronyms

Below is a list of acronyms that may be used in discussion of waste disposal facilities. These have been posted on the CMC web site, together with a link to the CIWMB acronyms page:

http://www.ciwmb.ca.gov/LEACentral/Acronyms/default.htm. 1

Updates will be provided as needed. This list was last revised on April 4, 2017.

Agencies

ACWMA – Alameda County Waste Management Authority

ANSI - American National Standards Institute

ARB or CARB - California Air Resources Board

ASTM – American Society for Testing and Materials

BAAQMD - Bay Area Air Quality Management District

CDFG or DFG - California Department of Fish and Game

CDRRR - California Department of Resources Recycling and Recovery, or CalRecycle

CIWMB - California Integrated Waste Management Board (predecessor to CDRRR - see above)

CMC - Community Monitor Committee

DWR - Department of Water Resources

LEA – Local Enforcement Agency (i.e., County Environmental Health)

CVRWQCB, RWQCB or Water Board – Central Valley Regional Water Quality Control Board, unless otherwise noted.

SWRCB - State Water Resources Control Board

Waste Categories

C&D - construction and demolition

CDI - Construction, demolition and inert debris

FIT – Fine materials delivered to the ALRRF, measured by the ton.

GSET – Green waste and other fine materials originating at the Davis Street Transfer Station, for solidification, externally processed.

GWRGCT - Green waste that is ground on site and used for solidification or cover (discontinued January 2010)

GWSA – Green waste slope amendment (used on outside slopes of the facility)

MSW - Municipal solid waste

RDW – Redirected wastes (received at ALRRF, then sent to another facility)

RGC – Revenue generating cover

Water Quality Terminology

IDL – Instrument Detection Limit – The smallest concentration of a specific chemical, in reagent grade water, that can be detected, with 99% confidence, with the detection instrument (e.g. the mass spectrometer).

MCL – Maximum Contaminant Level – The legal threshold limit on the amount of a substance that is allowed in public water systems under the Safe Drinking Water Act.

MDL – Method Detection Limit – The smallest concentration of a specific chemical, in a sample that contains other non-interfering chemicals, that can be detected by the prescribed method, including preparatory steps such as dilution, filtration, digestion, etc.

RL – reporting limit: in groundwater analysis, <u>for a given substance and laboratory</u>, the concentration above which there is a less than 1% likelihood of a false-negative measurement.

Substances or Pollutants

ACM – asbestos-containing material

ACW - asbestos-containing waste

ADC – Alternative Daily Cover. For more information: http://www.ciwmb.ca.gov/lgcentral/basics/adcbasic.htm1

BTEX – benzene, toluene, ethylbenzene, and xylene (used in reference to testing for contamination)

CH4 - methane

CO2 - carbon dioxide

DO - dissolved oxygen

HHW - household hazardous waste

Rev. 4/4/2017

¹ This link may need to be typed into your search bar to work correctly.

LFG - landfill gas

LNG - liquefied natural gas

MEK - methyl ethyl ketone

MIBK - methyl isobutyl ketone

MTBE - methyl tertiary butyl ether, a gasoline additive

NMOC - Non-methane organic compounds

NTU - nephelometric turbidity units, a measure of the cloudiness of water

TCE - Trichloroethylene

TDS - total dissolved solids

TKN – total Kjeldahl nitrogen

TSS – Total Suspended Solids

VOC - volatile organic compounds

Documents

CCR - California Code of Regulations (includes Title 14 and Title 27)

ColWMP - County Integrated Waste Management Plan

CUP - Conditional Use Permit

JTD – Joint Technical Document (contains detailed descriptions of permitted landfill operations)

MMRP - Mitigation Monitoring and Reporting Program

RDSI - Report of Disposal Site Information

RWD - Report of Waste Discharge

SRRE - Source Reduction and Recycling Element (part of ColWMP)

SWPPP - Stormwater Pollution Prevention Plan

WDR - Waste Discharge Requirements (Water Board permit)

General Terms

ALRRF - Altamont Landfill and Resource Recovery Facility

ASP – Aerated Static Pile composting, which involves forming a pile of compostable materials and causing air to move through the pile so that the materials decompose aerobically.

BGS - below ground surface

BMP - Best Management Practice

CASP - Same as ASP, above; but the "C" denotes that the pile is covered.

CEQA - California Environmental Quality Act

CQA - Construction Quality Assurance (relates to initial construction, and closure, of landfill Units)

CY - cubic yards

GCL - geosynthetic clay liner

GPS - Global Positioning System

IC engine - Internal combustion engine

LCRS - leachate collection and removal system

LEL - lower explosive limit

mg/L - milligrams per liter, or (approximately) parts per million

μg/L – micrograms per liter, or parts per billion

PPE – personal protective equipment

ppm, ppb, ppt – parts per million, parts per billion, parts per trillion

RAC – Reclaimable Anaerobic Composter – a method developed by Waste Management, Inc., to place organic materials in an impervious containment, allow them to decompose anaerobically, and extract methane during this decomposition.

SCF – Standard cubic foot, a quantity of gas that would occupy one cubic foot if at a temperature of 60°F and a pressure of one atmosphere

SCFM - standard cubic feet per minute, the rate at which gas flows past a designated point or surface

STLC – Soluble Threshold Limit Concentration, a regulatory limit for the concentrations of certain pollutants in groundwater

TTLC – Total Threshold Limit Concentration, similar to STLC but determined using a different method of analysis TPD, TPM, TPY – Tons per day, month, year

WMAC - Waste Management of Alameda County



COMMUNITY MONITOR COMMITTEE

Altamont Landfill Settlement Agreement

Minutes of April 11, 2018

DRAFT

1. Call to Order

The meeting was called to order at 4:12 p.m.

Roll Call

Members Present: Jerry Pentin; Robert Carling; Donna Cabanne; David Tam;

Marcus Nettz II, ALRRF; Arthur Surdilla, LEA;

Absent: Robert Cooper, Altamont Landowners Against Rural

Mismanagement

Staff: Judy Erlandson, City of Livermore Public Works

Department; Kelly Runyon, Community Monitor

Others: Marisa Gan, City of Livermore

3. Introductions

Those in attendance introduced themselves.

4. Approval of Minutes

Approval of the January 2018 minutes was moved by Mr. Tam. Mr. Tam noted an incorrect date in those minutes. With that correction, the motion was seconded by Mr. Carling and the minutes were approved unanimously (4-0).

5. Open Forum

There was no Open Forum discussion.

- 6. Matters for Consideration
 - 6.1 Responses to Committee Member Questions <u>Mitigation Land Proximity to ALRRF</u>: Ms. Cabanne asked for clarification about the locations of the mitigations involved. Mr. Runyon explained that since the US Fish and Wildlife Service (USFWS) has not required off-site mitigations, the ALRRF need not perform the stream channel mitigation close to the landfill. Ms. Cabanne then asked for clarification on the timing of the reporting requirement (to USFWS), which apparently is to be four years after the start of construction of Fill Area 2. Mr. Runyon stated that he would research how that condition is being applied, and when construction began on Fill Area 2, and report back at the next meeting. Ms. Cabanne also asked about the differences between the biological permit conditions in the Alameda County CUP for Fill Areas 1 and 2,

versus the State and Federal agency permit conditions. Mr. Runyon

explained that although the State and Federal agency permit conditions appear to have been modified as they were finalized between 1999 and 2015, the CUP conditions do not appear to have changed since 1999.

In response to other questions from Members, Mr. Runyon also described the status of the Buttonwillow hazardous waste facility and the locations of several hazardous waste facilities in the southern Central Valley.

6.2 Status of Wetland Mitigation

Mr. Runyon noted that construction of the wetland pond has been suspended due to wet weather interfering with access and earthmoving. Mr. Nettz added that due to continuing wet conditions probably would not resume until early May. Ms. Cabanne asked if this delay would reset any time requirements associated with permits. Mr. Runyon noted that (a) the current estimate to begin using Fill Area 2 is early 2019, because Fill Area 1 has sufficient volume available, at least until then; (b) completion of the pond is a prerequisite for placement of refuse in Fill Area 2; and (c) it appears feasible for the pond construction and planting to be completed by early 2019.

6.3 Five-Year Permit Review

Mr. Surdilla stated the LEA office has received the current version of the draft JTD, and his colleague Wing Suen is working on a response to that draft. In response to a question from Ms. Cabanne, Mr. Surdilla stated that he does not know when that response will be complete.

6.4 Review of Reports Provided by ALRRF Air Emissions Report

Mr. Runyon reported that the only unusual aspect of air emissions control at the ALRRF was the number of unique issues that arose within the landfill gas collection and conversion systems: damage to pipelines, loss of water supply, a refrigerant leak in the LNG plant, etc. The impact to the overall system was minor, and the system remained in compliance. Groundwater Report

Mr. Runyon related the general finding by Langan Engineering that the groundwater quality data should continue to be tracked. He also noted that the recent issue of contamination at well MW-4 is potentially very significant, raising concern about the ALRRF's assertion that the likely cause is landfill gas. He then described the Community Monitor consulting team's investigation into this assertion, which concluded that (a) landfill gas indeed could be the cause of this contamination, (b) proof of this assertion might require sampling of the gases within the groundwater well itself, and (c) results of that sampling could raise concern in other regulatory agencies. Ms. Cabanne asked which agencies might have such a concern, and Mr. Runyon replied that CalRecycle – and by extension, the LEA – might become concerned if test results indicated that landfill gas was reaching monitoring wells, since landfill gas containment is within their regulatory purview.

In discussion, Mr. Runyon mentioned that staff at the Central Valley Regional Water Quality Control Board (Water Board) have been reluctant to accept that the cause of this contamination is landfill gas. Mr. Nettz noted that the ALRRF has been meeting and will continue to meet with Water Board staff to make them aware of possible causes of this issue. Mr. Carling stated that the landfill gas explanation made sense to him, and he asked if Water Board staff had an alternative explanation. Mr. Runyon responded that staff simply seem to find it more credible that the contamination is water-borne. Mr. Nettz concurred and added that Water Board staff want the ALRRF to invest heavily in groundwater sampling and testing near MW-4 and along the northern boundary of Fill Area 1. His concern is that Water Board staff have limited experience with landfill issues and may not be considering the most likely cause. Ms. Cabanne asked how much time would be needed to be sure that the cause of the problem is understood. Mr. Runyon responded that he does not know of an industry standard for that, nor would he expect the Water Board to have an answer. He also noted that because MW-4 is upgradient of the landfill, one could infer that either the contaminants are not being carried by groundwater, or that the ALRRF's groundwater model is flawed.

Ms. Cabanne also expressed concern about Langan's note that groundwater monitoring well sampling quality might improve if purge flow rates were lower, stabilization-sampling intervals were longer, and depth-to-water measurements were more frequent. She asked if these recommendations will be implemented at the landfill. Mr. Runyon replied that Langan's memo is provided to inform the Committee, and the ALRRF is not obligated to comply. He added that these issues have been raised by Water Board staff as well, and they will be resolved between the Water Board and the ALRRF.

Mr. Tam asked if a major earthquake near the ALRRF could cause a release that would threaten the water supply in the Tri-Valley area. Mr. Runyon stated that he did not know if that had been studied, but he would expect that in such a case, a failure of the South Bay Aqueduct canal along Dyer Road would be the more likely problem. In response to a further question from Mr. Tam, Mr. Runyon also stated that in such an event that he did not believe landfill leachate would impact canal water, due to the distance between the two.

Referring to the February 16 Notice of Violation regarding inadvertent disposal of lead paint chips at the landfill, Ms. Cabanne asked what the consequences for the ALRRF might be. Mr. Runyon responded that the Water Board could impose a fine, or could require the landfill to remove the material. He also noted that while the issue is unresolved, the ALRRF has cordoned off the area and is not adding fill above that location. Ms. Cabanne asked if the mention of four such recent incidents in the Water Board's NOV meant that the ALRRF had exceeded a regulatory threshold.

Mr. Nettz discussed the impracticality of testing every load that is delivered, and the need for the Water Board to understand the customer's role in causing such issues. He also stated that this particular issue has not been resolved but is in discussion with Water Board staff.

6.5 Review of Documents on GeoTracker Web Site
Mr. Carling asked what can be expected to be posted on GeoTracker. Mr.
Runyon replied that in general, the Water Board posts certain regulatory
correspondence immediately, and they post reports from the ALRRF
about 30 days after submittal. Mr. Runyon agreed to raise this question
first with ALRRF staff, then with Water Board staff if necessary.

Mr. Runyon provided a general summary of the status of the issues currently described on GeoTracker, noting that most are continued from the previous summary but two are new Notices of Violation. One (lead paint chips) was previously discussed; the other was due to some missing information from the previous (First) 2017 Semi-Annual Groundwater Monitoring Report; this was recently corrected. Mr. Carling asked if the Water Board had accepted the ALRRF's invitation to meet and discuss unresolved issues. Mr. Nettz replied that they had.

Ms. Cabanne had several questions: With the postponement of the ET cover test, would it still continue for 4 years? Mr. Runyon said that he believed so. For the investigation into stormwater VOC's, would the Community Monitor continue to track that? Mr. Runyon said yes. Will the Community Monitor also track the status of the use of landfill underdrain water as compost quench water, and the Water Board's interest in establishing monitoring along the northern border of Fill Area 1? Mr. Runyon said that he would bring any new information on these topics to future Committee meetings, as soon as it becomes available.

6.6 Reports from Community Monitor

Mr. Runyon discussed two items from his site visit reports:

- 1. High volumes of Class 2 cover soil continue to be brought to the ALRRF, as shown in Figure 6.6-1; and
- 2. The intermittent seep shown in the photo on page 54 of the packet is a future design issue for the landfill but is not a problem per se.

Mr. Carling noted a typographic error in the inspection date shown at the top of page 53. Mr. Runyon stated that he would correct that.

Mr. Carling also expressed concern about the number of truck overturns, and Mr. Nettz responded, stating the following. Driver inexperience and lack of cooperation are the most common reasons. This is in part due to the high demand for large dump trucks and drivers, both for construction work and for cleanup of the North Bay fire zones; as a consequence, drivers inexperienced with landfill conditions and materials are being used.

Also, the problem occurs in spite of spotters, signage, and communication from the ALRRF to the trucking contractors.

Ms. Cabanne expressed concern about the sheer number of these overturns. Mr. Runyon explained that it is in proportion to the amount of material currently being brought in by these types of trucks.

6.7 Draft Annual Report

Mr. Runyon noted that the only comment, which would be incorporated, came from StopWaste regarding the description of that agency. Committee members had no other comments. Mr. Runyon stated that he would finalize the report.

- 6.8 Altamontcmc.org Web Site Ease of Use A motion to accept the proposed improvements was made by Mr. Pentin and seconded by Ms. Cabanne. It passed unanimously (4-0).
- 6.9 Announcements

 No announcements were made.

7. Agenda Building

No items were suggested.

8. Adjournment

The meeting was adjourned at 5:18 p.m.

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memorandum

date June 28, 2018

to ALRRF Community Monitor Committee

from Kelly Runyon

subject CMC Meeting of 7/11/18 - Agenda Item 6.1 - Responses to Committee Members' Questions

Submittal Date for Year 4 Mitigation Report

At the April 11, 2018 Community Monitor Committee meeting, Ms. Cabanne recalled that the permits for Fill Area 2 require a report four years after the construction of Fill Area 2, and she asked when construction of Fill Area 2 began.

[This question has been raised with ALRRF staff, and a response is pending.]

Consistency of Fill Area 2 CUP with US Fish and Wildlife Service Biological Opinion

At the April 11, 2018 Committee meeting, Ms. Cabanne noted the Community Monitor's mention of some apparent differences between the biological mitigation requirements of Alameda County CUP-5512 and the requirements in permits from natural-resource agencies including the USFWS's Biological Opinion and related permits. She asked if the County has modified, or will modify, the CUP to be consistent with the others.

[This question has been raised with ALRRF staff, and a response is pending.]

Posting of Documents on Geotracker Web Site

At the April 11, 2018 Committee meeting, Mr. Carling asked if there are guidelines governing when, or if, documents related to Central Valley Regional Water Quality Control Board (Water Board) requirements are posted to the Water Board's Geotracker web site¹ and thus made public.

A fact sheet describing Geotracker² is posted on the web site. It explains that Geotracker comprises three modules:

• A Document Manager Module that provides most of the public record for a site to the public through its Document Manager Module of over 350,000 documents, including "regulatory communication with

 $^{^{1}\} https://geotracker.waterboards.ca.gov/profile_report?global_id=L10005834311$

² https://www.waterboards.ca.gov/water_issues/programs/gama/docs/geotracker_factsheet.pdf

responsible parties, regulatory actions such as records of decision documents, and all data and documents submitted by the responsible party using Business to Government Reporting Module for Electronic Submission of Information (ESI)."

- The ESI module which "is used for secure reporting of laboratory data, field measurement data, documents and reports." This appears to be an input module, available to those who need to submit reports.
- A Secure Portal which "enables ... regulators ... to oversee and track project activities, compliance responses, milestone tracking, land use controls, [and] risk to water quality." This appears to be an internal management tool not visible to the public.

Further information about the use of ESI module is available on a separate web page³. It indicates that "once an ESI compliance submittal has been received, it is moved into the GeoTracker archive database and becomes immediately available to the public on the public Geotracker web site (http://geotracker.waterboards.ca.gov/)." ESI compliance submittals typically contain scientific data such as monitoring well locations and water quality test results. In our experience with ALRRF reporting, it appears that lengthy technical reports such as the Semi-Annual Groundwater Monitoring Reports are moved to the public Geotracker web site after a review period of approximately four weeks.

Geotracker-related web pages do not state that <u>all</u> submitted reports are made available to the public. It appears that reports containing no water quality data, such as design documents or compliance progress reports, may be made available to the public via Geotracker at the discretion of Water Board staff.

This question was also discussed with ALRRF staff (Audrey Lundin). She has observed that Water Board staff will post reports submitted through the ESI module after an internal review period, but they may withhold reports that contain sensitive information such as costs or proprietary data.

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³ https://www.waterboards.ca.gov/ust/electronic_submittal/docs/roles_responsibilities.pdf

memorandum

date June 28, 2018

to ALRRF Community Monitor Committee

from Kelly Runyon

subject $\,$ CMC Meeting of 7/11/18 - Agenda Item 6.2 - Status of Wetland Mitigation Construction

In February 2018, construction work to rebuild the mitigation pond and its upstream channel was suspended due to wet conditions. Work resumed in May. ALRRF staff have verbally reported that the excavation and grading work at the pond concluded in June, and the procurement and installation of plants will occur this fall.

ALS PROFIT MILITARY PARTY.

memorandum

date June 28, 2018

to ALRRF Community Monitor Committee

from Kelly Runyon, Michael Burns

subject CMC Meeting of 7/11/18 - Agenda Item 6.4 - Review of Report Provided by ALRRF

Amended Report of Waste Discharge / Proposed Evaluation Monitoring Plan (Plan)

On June 14, ALRRF staff provided the Community Monitor with a copy of this Plan as it was being submitted to the Central Valley Regional Water Quality Control Board (Water Board). It summarizes the groundwater contamination problem at MW-4, provides available data (through May 2018), and proposes a work plan to comply with the Water Board's request to provide:

- A decision tree diagram to define the extent of contamination.
- An explanation of how each borehole will be logged.
- A justification for each well location (including map).
- A sampling plan for both the unsaturated and saturated zone.
- A proposed interim corrective action measure.
- A detailed schedule with milestones.

These steps are typically taken in cases that involve a plume of contaminated groundwater caused by release of a liquid pollutant. However, they can be adapted to a situation where landfill gas is the likely cause, and the Plan does precisely that. It begins by noting that increased gas extraction near MW-4 has greatly reduced or eliminated the concentrations of all the detected contaminants. It then proposes a decision tree that, at a minimum, will sample soil gas from three locations near MW-4 but outside of Fill Area 1. If contamination is found to be more widespread, the ALRRF will take additional samples of soil gas and/or groundwater at greater distances from MW-4 to determine the full extent of the problem. For corrective action, the ALRRF proposes to continue to extract landfill gas aggressively in the area where the problem is occurring.

To support this approach, the Plan notes that this problem has arisen at the well that is closest to the boundary between the membrane-lined (Class 2) unit and the clay-lined (Class 3) unit of Fill Area 1, which the report describes as "unlined." It also states that the unlined portion "has the highest potential to allow migration of landfill gas outside the extent of the landfill..."

The decision tree also proposes to focus more on groundwater sampling if groundwater contamination at MW-4 remains a problem. In that case the ALRRF would take groundwater samples from three locations near MW-4, and from additional locations as needed to determine the full extent of the problem.

The proposed approach is clearly based on the assumption that contamination at MW-4 has been caused by landfill gas. To the Community Monitor team, this appears to be reasonable; but whether the Water Board will agree remains to be seen. We will continue to report on this issue as documents become available.

HIS PACE HILLIAN CONTRACTOR

memorandum

date June 28, 2018

to ALRRF Community Monitor Committee

from Kelly Runyon

subject CMC Meeting of 7/11/18 - Agenda Item 6.5 - Review of Documents on GeoTracker Web Site

Reports from the ALRRF to the Central Valley Regional Water Quality Control Board (Water Board), Water Board responses and other Water Board notices have been reviewed as they have been posted on the Water Board's GeoTracker website. Two of those items are notes from recent working meetings between Water Board staff and ALRRF staff and consultants. The notes are dated April 30 and May 17, but neither set of notes is explicit about the actual meeting dates. Below, these are referred to as April 30 Meeting Notes and May 17 Meeting Notes. For ongoing topics, new information is summarized in <u>underlined</u> additions to previous summaries. <u>Double underlining</u> indicates information gleaned from further review of previous correspondence and reports. The Ongoing Topics are followed by New Topics, which are summarized in plain text.

Ongoing Topics

Identifying Sources of VOC's in Storm Water

A December 1, 2016 letter from SCS Engineers (on behalf of ALRRF) to Central Valley Regional Water Board staff addresses that Water Board's requirement for a Work Plan to identify and evaluate potential sources of VOCs that may have impacted stormwater at the facility. A September 13, 2017 letter from Water Board staff requires that "a report documenting the results of the investigation ... be submitted by 30 June 2018." The May 17 Meeting Notes state that the ALRRF has collected the samples and will submit a report by June 30 as required.

Additional Monitoring Well Installed; VOC's Found, but Resampling Is Needed to Confirm

A December 15, 2016 report by Geosyntec addresses requirements in the 2016 WDRs to evaluate the adequacy of the current groundwater monitoring system and propose additional wells to adequately monitor Fill Area 2 throughout its development. Subsequently, a May 23, 2017 Monitoring Well Installation Report by Geosyntec was submitted, documenting installation of one upgradient well (MW-19) and two downgradient wells (MW-14R, MW-21) adjacent to the Phase 1 portion of Fill Area 2. It also proposed locations for additional wells MW-20 and MW-22 to monitor the Phase 2 and Phase 3 areas, respectively. A report from Geosyntec Consultants, dated November 17, 2017, described the installation of monitoring well MW-20 and reported that the initial sampling from that well (October 20, 2017) detected low levels of five VOC's. In a January 17, 2018 letter, Water Board staff advised the ALRRF that per the Waste Discharge Requirements, "routine monitoring and sampling of well MW-20 will be required." In the February 1, 2018 Groundwater Monitoring Report, SCS Engineers include data from October 20 and December 7. In the December 7 sample, acetone, a common laboratory contaminant, was the only VOC detected. To date, no further information from ALRRF or the Water Board has been made available on GeoTracker. This topic will be closed unless related issues arise in the future.

Soil Gas Monitoring Locations, Fill Area 2 Perimeter

A February 28, 2017 report by Geosyntec on behalf of the ALRRF proposed soil gas monitoring locations to satisfy the soil gas monitoring conditions in the current Waste Discharge Requirements. In an April 25 letter, Water Board staff call for a "detailed rationale for the spatial distribution selected for the unsaturated zone monitoring devices proposed around the entire outside perimeter of each waste management unit" by May 31. An Addendum dated May 30, 2017, prepared by Geosyntec Consultants, described the existing soil gas probe system, noting where shallow groundwater constrains the installation of additional probes. The Water Board's response was included in a letter to ALRRF dated November 9. In that letter, Water Board staff (a) rejected the ALRRF's plan to use existing gas probes, (b) required probes to be installed at the edge of each Phase of Fill Area 2, (c)stated that more than (the proposed) one new probe UGP-1 at the downslope edge of Phase 1 will be needed to assure early detection of a release, and (d) rejected the ALRRF's assertion that shallow groundwater near the downslope edge of Phase 1 would cause gas probes there to violate regulations and potentially impact groundwater quality. The Water Board also required the ALRRF to carry out its proposed gas monitoring plan and submit a revised work plan to install several additional gas probes that meet certain criteria. In a January 19, 2018 letter, Geosyntec (on behalf of ALRRF) reported depths to groundwater and stated that a gas probe installed there would indeed violate regulations. A map transmitted with the letter showed an alternative location for UGP-1, at the southwest corner of Fill Area 2 Unit 1, close to groundwater monitoring well E-20B. The letter also included an attachment proposing two additional probes, along the north and east sides of Fill Area 2 Phases 1 and 2. In a report dated March 27, Geosyntec describes the installation of probe UGP-1 at the alternative location, avoiding the shallow-groundwater problem.

ET Cover Planning, Design and Installation

An April 14, 2017 letter from Waste Management to the Water Board transmitted an Evapotranspirative (ET) Cover Work Plan prepared by Geosyntec. This is in response to an October 19, 2016 letter from Water Board staff which outlined the needed content for the Work Plan. The April 14 Work Plan shows 3 feet of vegetative cover to be placed in the test area over 1 foot of existing intermediate cover, with the top 2 feet lightly compacted to 90 percent relative compaction prior to planting. The report also indicates that a full design package with construction drawings, specifications and a Construction Quality Assurance Plan will be prepared. A September 25, 2017 letter from Waste Management informed the Water Board that due to differential settlement of recently-placed waste in the ET Cover test area, the area will need to be regraded before completing the cover soil installation; thus, the ET Cover test would need to be postponed one year, until the latter part of 2018. The May 17 Meeting Notes indicate that a decision about the feasibility of the ET Cover test location will be made shortly after an aerial topographic survey is completed (by June 30). The Notes also state that that ALRRF should provide the Water Board with "supplemental information addressing all modified reporting dates for the project."

Fill Area 1 Leachate and Underdrain Liquids Management; Use of Underdrain Liquid in Compost

On June 30, 2017, the ALRRF submitted a Work Plan for Fill Area 1, Leachate and Non-Leachate Liquids Management to the Water Board, as required by the 2016 Waste Discharge Requirements (WDRs). This report described several modifications to the existing system, to better isolate leachate from non-leachate liquids and, potentially, make good-quality non-leachate available for uses such as maintaining moisture levels in organics that are being composted. Water Board staff responded August 13, 2017, stating several requirements to better protect water quality. They also explicitly required an acknowledgement of these requirements (by 15 Oct 2017) and a copy of the final plans and specifications for the liquids management system improvements (by April 27, 2018) prior to implementing the work plan, as required, by 1 July 2018. In their acknowledgement dated October 13,

2017, Waste Management stated that "Based on test results and if determined to be suitable, WMAC plans to use these non-leachate liquids as quench water in composting operations and/or for dust control within or outside of the landfill."

In a response dated November 2, Water Board staff stated that this proposed use would require separate Waste Discharge Requirements, preceded by submittal of a Report of Waste Discharge from ALRRF to the Water Board (in essence, a permit application). In a response dated November 21, 2017, the ALRRF stated that they would continue to work on the liquids-separation project, as required; but they would also continue to use combined leachate and groundwater as they have historically, for dust control and reinjection. In their January 17, 2018 reply, Water Board staff point out that this is a violation of California regulations, but the WDRs allow time to correct it. Moreover, they expect (a) submittal of construction plans for the separation system by April 27, 2018, and (b) full compliance with the liquids separation requirement by February 1, 2019.

The May 17 Meeting Notes state that the ALRRF has completed its planning and will bid out the liquids separation system work before the end of May, and that the ALRRF still plans to use underdrain water in the composting operation. In response, Water Board staff replied that such water will need to be remediated to remove VOCs, and that remediation will need to be permitted through the Water Reclamation General Order process.

Notice of Violation and Work Request: Monitoring Well MW-4A

Samples from monitoring well MW-4A, which is outside the northeast edge of Fill Area 1, contained exceedances of certain inorganics and VOCs in May 2017. In resamples taken in June and July, high bicarbonate alkalinity, 1,1-DCA, cis-1,2-DCE, and MTBE were detected in all samples during that period. In the initial sample, calcium and two other VOCs had also been detected.

The Water Board Notice of Violation, dated October 19, 2017, states in part: "...now that a release is confirmed, the Discharger is required to establish an evaluation monitoring program" that meets certain specified requirements. The notice also points out that detection at this site is contrary to the landfill's hydrogeologic model, which states that groundwater flow generally follows topography and thus would not be migrating toward MW-4. The ALRRF responded by submitting an Amended Report of Waste Discharge/ Proposed Evaluation Monitoring Plan on December 21, 2017. It attributed the problem to landfill gas, not leachate, and it proposed to address the problem by intensifying the extraction of landfill gas near MW-4A, and by sampling the well monthly. On February 8, the Water Board issued a formal Order to the ALRRF, requiring a formal Evaluation Monitoring Program to sample groundwater along the "unmonitored northern limit" of Fill Area 1.

The April 30 Meeting Notes indicate that Waste Management had petitioned (appealed) the February 8 Order, believing that this would require groundwater sampling along the 3,500-foot northern boundary. Water Board staff replied that the Order was worded more generally, to enable Waste Management to focus on the release identified in MW-4A, deferring the big picture question of the adequacy of the site's groundwater model. To provide more explicit direction, Water Board staff agreed to re-review and comment on the previously submitted Amended Report of Waste Discharge.

On May 7, Water Board staff issued an Amended Work Plan, with six specific components to be submitted by June 15. The Amended Work Plan refers to the "release" at MW-4 without identifying the probable cause as leachate or landfill gas. The May 17 Meeting Notes report that Waste Management stated that it is preparing the work plan, which will contain a "stepped" approach to assess the extent of the release around well MW-4. The Notes also

indicate that Water Board staff stated that the work plan must take into account the potential for contaminants to migrate along the fault zone between MW-04A and Fill Area 1.

On June 14, Waste Management submitted a revision of the December 21 Amended Report of Waste Discharge/ Proposed Evaluation Monitoring Plan that provides the six required components. The approach assumes that landfill gas is the most probable cause, and it investigates the spread of both landfill gas and contaminated groundwater, beyond MW-04A to the east (away from Fill Area 1). It does not explicitly address the Water Board staff's concern about migration in the nearby fault zone.

Notice of Violation - Disposal of Lead Based Paint Chips

In a letter dated February 16, 2018, Water Board staff noted that on February 8, Waste Management gave verbal notice that a load containing paint chips with hazardous levels of lead had been disposed at the ALRRF. This was followed by a written notification dated February 13, in which, due to the difficulty of safely and effectively finding and removing this material, Waste Management "respectfully requested that the hazardous waste paint chips remain in place." The disposal of hazardous waste, as defined, is prohibited by the site's Waste Discharge Requirements; therefore, this Notice of Violation was issued. The letter also notes that this is the fourth such incident in the past four years, and the Water Board is "evaluating additional enforcement action."

Notes from the April 30 meeting indicate that ALRRF management expressed concern that the NOV appears to lay blame for the incident solely with the landfill. In response, Water Board staff said that although they will continue to issue NOVs for such incidents (as required by law), the NOVs will provide more background information.

New Topic

Revised Configuration and Phasing Schedule for Fill Area 2

The May 17 Meeting Notes indicate that due to cost concerns and potential waste stability issues, the ALRRF is modifying the footprint and the phased development plan for Fill Area 2. On the following pages, Figure 6.5-1 compares the original footprint (from the 2016 Joint Technical Document) and the footprint and phasing currently being considered. It should be noted that the new layout was provided to Water Board staff as an information item, not a formal request for modification of the ALRRF's permit documents. Figures 6.5-2 and 6.5-3 provide additional comparisons using photographic background imagery. Figure 6.5-2 is a freehand perspective graphic showing, roughly, how the four modified phases will occupy Fill Area 2. Since the background photo was taken from within the Phase 2 area, much of the modified Phase 2 footprint is not visible.

The ALRRF also pointed out that in conjunction with this change in layout, several existing monitoring wells will need to be moved (destroyed and reinstalled) to accommodate the new footprint. More specifically, it would not be possible to continuously maintain wells along the edge of the fill phases, although that is required by the WDRs.

Water Board staff asked for a formal submittal describing these changes so that they could evaluate them.

The schedule for the construction of Fill Area 2 Phases 1-4 is:

- Phase 1, which is fully constructed, will receive waste beginning in April of 2019
- Construction of modified Phase 2 will begin in 2019
- Excavation of Phases 3 and 4 will begin in 2020.

Figure 6.5-1
Fill Area 2 Footprints, 2016 and 2018

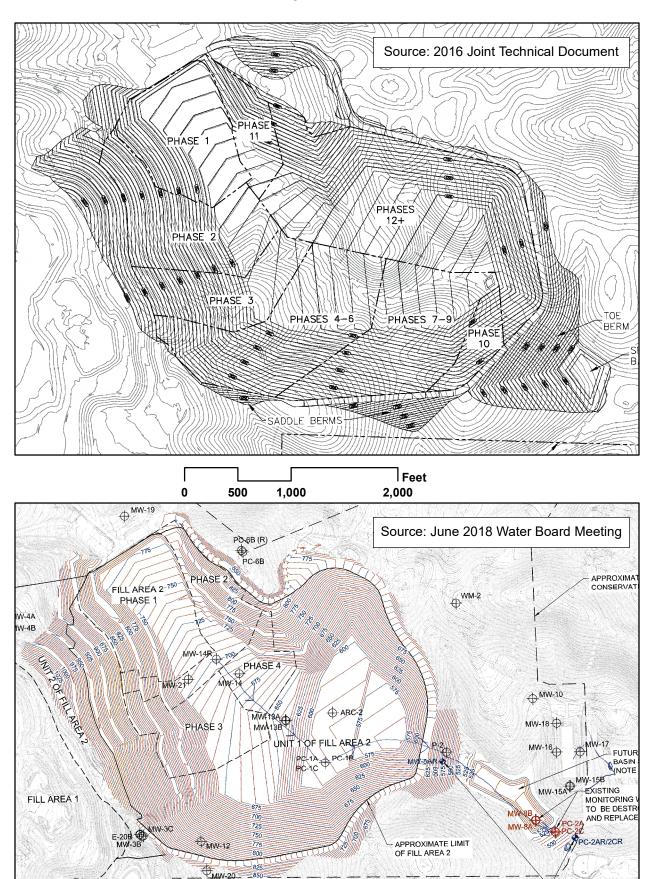


Figure 6.5-2
Simulation of 2018 Fill Area 2 Footprint, with Phases

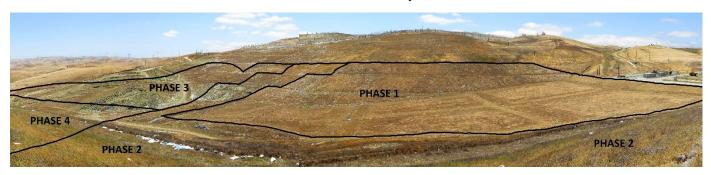


Photo Taken May 31, 2018

Figure 6.5-3
Comparison of Fill Area 2 Footprints



memorandum

date June 28, 2018

to ALRRF Community Monitor Committee

from Kelly Runyon

subject CMC Meeting of 7/11/18 - Agenda Item 6.6 - Reports From Community Monitor

Attached are inspection reports for April through June of 2018.

The April inspection was announced and took place on April 26.

The May inspection was announced and took place on May 31.

The June inspection was unannounced and took place on June 15, with the LEA.

During these inspections, all landfill operating areas were observed. Recent LEA inspection reports were reviewed on-line.

Details about operations-related matters are provided in the attached reports. Issues that cause special concern are marked with yellow rectangles in the monthly inspection reports. For this quarter, the high wind event of May 30-31, and the resulting windblown litter, are the primary cause for concern.

Also attached are graphs showing monthly tonnages by type of material for the most recent 12-month period. Figure 6.6-1 shows the breakdown of materials that make up Revenue-Generating Cover. Figure 6.6-2 shows these same quantities, plus the Municipal Solid Waste (MSW) and Special Waste tonnage for each month.

April 2018

Tonnage	age Report for March 2018, received April 18, 2018 Summary: sposed, By Source Location Tons Disposed from Within Alameda County Other Out of County Disposal Tons	subtotal Disposed	tons 74,375.77 4,943.42 79,319.19	
Di 2.1 2.2 2.3	sposed, By Source Type C&D MSW Special Wastes	subtotal Disposed	428.77 72,397.25 6,493.17 79,319.19 0.00	0.00%
Other Major Categories 2.4 Re-Directed Wastes (Shipped Off Site or Beneficially Used) 56.89 2.5 Revenue Generating Cover 56,605.72 Total, 2.1 - 2.5 135,981.80				
Ma 2.3.1 2.3.2 2.5.1 2.5.2 2.5.3	Atterials of Interest Friable Asbestos Class 2 Cover Soils Auto Shredder Fluff Processed Green Waste/MRF fines, Beneficial U MRF Fines for ADC	se (GSET)	723.83 34,507.75 12,751.95 0.00 2,928.84	

Site Inspection April 26, 2018, 10:30 - 11:45 AM

- ☐ Attended by K. Runyon. Escorted by Audrey Lundin and Enrique Perez. Announced.
- □ Primary filling activity was on the east side of Fill Area 1, midway between the north and south boundaries, in the Class 2 area. Two tippers (diesel powered) were available. One compactor and one dozer were operating.
- ☐ The public disposal area was in a separate location north of the tippers. One compactor was handling waste, and one D9 dozer was spreading cover from above.
- ☐ The number of seagulls was smaller than in prior (wet season) months. During this visit, more than one bird cannon was heard; "screamer" munitions were not being used.
- □ At the ET cover area, a variety of low-growing plants were growing in thinly scattered patches. These included amsinkia, mustard, bur clover, and non-native grasses. Soil conditions were unchanged, and the top deck continued to exhibit shallow swales in some locations due to differential settlement. There was no plant growth on the soil stockpiled for future use in the ET cover area.



- ☐ The plant debris bunker was about 10% full. The C&D bunker was about 50% full, largely with scrap wood and pallets. No prohibited materials were seen in the C&D bunker.
- ☐ The two ponds that were reconstructed to serve Fill Area 1 were not yet in use. Each contained a small amount of rain water.
- □ Due to recent wet weather, a small shallow ponded area was seen near the recently-installed condensate tank on the west side of Fill Area 1. Staff explained that the condensate system had been modified to use this tank as the last stop for collected landfill gas condensate before pumping it to the flare near the LNG plant. The ponded liquid was rain water, not condensate.
- ☐ In the location where a load possibly containing lead paint chips had been disposed, the area remained cordoned off for possible future remediation.

Fill Area 2

- □ Due to strong winds, a large group of seagulls that had flown to Fill Area 2 were unable to return to Fill Area 1. They were flying against the wind, in a group, but could not make headway.
- □ In spite of the wind, Fill Area 2 was almost entirely free of litter. Grasses and other low vegetation covered the entire area.
- □ No erosion, earth movement, or ponding was seen in Fill Area 2.



Stormwater Controls and Best Management Practices

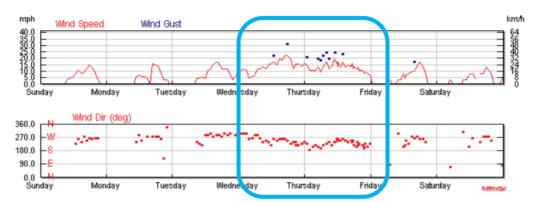
- □ All observed basins were below discharge levels. Water levels at Basins A and B were several feet below the discharge elevation. Basins SB-A (within Fill Area 2) and SB-1 (immediately north of Fill Area 2) were shallow, with their outlets several feet above the water level. Basins C and SB-2 were not observed.
- ☐ Erosion controls (wattle, ditch liner, hay bales in ditches, etc.) were in serviceable condition.

ALRRF Community Monitor Monthly Report

Tonna	nage Report for April 2018, received May 15, 2018 ge Summary: Disposed, By Source Location Tons Disposed from Within Alameda County Other Out of County Disposal Tons subtotal Disposed	tons 70,383.35 7,046.29 77,429.64	
2.1 2.2 2.3	Disposed, By Source Type C&D MSW Special Wastes subtotal Disposed	914.03 68,604.61 7,910.46 77,429.10 -0.54	0.00%
Other Major Categories 2.4 Re-Directed Wastes (Shipped Off Site or Beneficially Used) 2.5 Revenue Generating Cover Total, 2.1 - 2.5			
2.3.1 2.3.2 2.5.1 2.5.2 2.5.3	Materials of Interest Friable Asbestos Class 2 Cover Soils Auto Shredder Fluff Processed Green Waste/MRF fines, Beneficial Use (GSET) MRF Fines for ADC	1,048.70 28,839.58 17,919.24 0.00 2,246.76	

Site Inspection Thursday May 31, 2018, 1:00 - 2:30 PM

- ☐ Attended by K. Runyon, escorted by Audrey Lundin and Enrique Perez. Announced.
- A wind event, which began on May 30 and was continuing during this inspection, caused a large amount of windblown litter to be deposited to the west of Fill Area 1 (active area), into the south portion of Fill Area 2 and the open space farther west. Wind speeds had been 20 30 MPH continuously, with gusts up to 50 MPH. During this inspection, ALRRF staff checked the wind speed using a hand held anemometer, which gave a reading of 27 MPH. The chart below is from a location within the City of Livermore, where wind speeds are lower than at the ALRRF.



Source: Wunderground station KLVK, Livermore Municipal Airport

- □ Primary filling activity was on the east side of Fill Area 1, in the Class 3 area. Two diesel-powered tippers were operating, and one compactor was handling and compacting refuse during these observations.
- □ Near the tippers, a stockpile of Class 3 cover soil was being excavated and transported to the vicinity of the working face.
- ☐ The public disposal area was to the northeast of the tippers, in the Class 2 area.
- ☐ The gull population appeared to be low, both at Fill Area 1 and the Dyer Road reservoir. No bird control devices were in use. No gulls were seen in Fill Area 2.
- ☐ At the ET cover test area, the sparse plant growth appeared to be summer-dormant, with no new plants germinating.
- ☐ The C&D bunker was about 50% full. The former plant debris bunker was empty of plant debris and was being used to hold scrap metal (appliances).

- □ Both solidification basins were receiving or holding liquids. Neither was mixing during these observations, nor did they have dry material ready for mixing.
- □ At the ponds serving Fill Area 1, the north pond was empty and the south pond contained underdrain water and leachate. Ultimately, the south pond will contain leachate and the north pond will contain underdrain water, which the ALRRF intends to use as supplemental water for the CASP.
- □ About 200 yd northwest of the main scale house, the ALRRF was installing a fully-automated scale system to handle after-hours loads from transfer stations. This is in the area formerly occupied by the Bio-Fuels, Inc. wood grinding operation.

Fill Area 2

This photo shows accumulated windblown litter from the recent wind event. Cleanup of this material was hindered by low staffing of the litter control crew. ALRRF was actively hiring replacement workers, but hiring procedures governed by union contracts were causing delays in hiring.



□ Sedimentation basin SB-A, within Fill Area 2, was heavily impacted by windblown litter. Litter was along the banks of the pond and in the water. Most of this litter was film plastic: bags, pieces of visqueen film, etc.

Mitigation Pond Reconstruction

□ Excavation (silt removal) had resumed, since wet weather was unlikely in the coming weeks.



Tonnag	nage Report for May 2018, received June 15, 2018 e Summary: isposed, By Source Location Tons Disposed from Within Alameda County Other Out of County Disposal Tons	subtotal Disposed	tons 77,027.54 9,965.59 86,993.13	
	isposed, By Source Type			
2.1	C&D		1,280.91	
2.2	MSW		73,799.33	
2.3	Special Wastes		11,912.89	
		subtotal Disposed	86,993.13	
			0.00	0.00%
O	ther Major Categories			
2.4	Re-Directed Wastes (Shipped Off Site or Beneficially Used)		5,038.35	
2.5	Revenue Generating Cover		66,962.86	
		Total, 2.1 - 2.5	158,994.34	
N	aterials of Interest			
2.3.1	Friable Asbestos		683.57	
2.3.2	Class 2 Cover Soils		42,553.97	
2.5.1	Auto Shredder Fluff		15,335.95	
2.5.2	2.5.2 Processed Green Waste/MRF fines, Beneficial Use (GSET)		0.00	
2.5.3	MRF Fines for ADC		2,124.95	

Site Inspection June 15, 2018, 12:00 noon - 1:45 PM

- □ Attended by K. Runyon, accompanying LEA Arthur Surdilla. Escorted by Audrey Lundin and Enrique Perez. Unannounced.
- □ Primary filling activity was on the east side of Fill Area 1, downwind of the highest terrain. Compaction was taking place close to the tippers, with one dozer, one compactor and two tippers operating during these observations.
- ☐ Two Waste Management hosteler trucks were bringing transfer trailers from the "drop and hook" area to the tippers. In addition, loads from Fremont were being received. The waiting line at the tippers was only one truck long. Bird cannons were operating.
- ☐ The active tippers were diesel fueled. The CNG tippers were stored at the wet weather pad where they could be brought on line if needed.
- ☐ The public disposal area was north of the tippers, in the Class 2 area. A wheeled loader was consolidating refuse and a compactor was crushing and spreading it.
- ☐ One water truck was wetting down roadways, but near the working face, there was a noticeable amount of windblown dust.
- □ Although winds were lighter than in late May, they were still strong, and the windblown litter problem had not improved. The ALRRF had been working to hire litter pickers through the union, but staff mentioned that this was a slow process with limited success. Having exhausted the list of union referrals, the ALRRF was beginning to take applications from others.
- Two litter crew members were observed cleaning up the interior of the sedimentation basin SB-A, in Fill Area 2, placing litter into black trash bags for later removal.



- □ A low-to-moderate number of gulls was seen near the working face. In Fill Area 2, a group of perhaps 200 gulls was stranded, unable to fly against the wind to return to the working face at Fill Area 1.
- ☐ The stockpile of soil for the ET cover area showed no evidence of plant growth or erosion.
- ☐ The C&D bunker was about 50% full. The plant debris bunker was empty. The solidification basins were dry and inactive.
- ☐ The area containing lead paint chips was no longer cordoned off, and refuse fill had been placed above it. Landfill staff indicated that this reflected recent communications with Water Board staff.

- ☐ Installation of the automated truck scale was continuing. The platform was in place, and pavement was being installed on the associated roadway and ramps.
- □ Class 3 soil was being received in the Class 3 area within Fill Area 1, and it was being staged for later placement as cover.
- ☐ The access road to the asbestos disposal area was rerouted to accommodate additional fill activity nearby.

Stormwater Controls and Best Management Practices

- □ At Pond A, the bulrushes and cattails were growing in around the edges after excavation had removed most of them several weeks prior. Some algae was beginning to grow beneath the surface in shallow areas (the north end of the pond).
- □ Ponds B and C had minimal litter and were several feet below their discharge elevations. Pond US-B (which feeds into pond B) was dry.

Fill Area 2

There was a substantial amount of windblown litter within, and east of, Fill Area 2.



□ Aside from the litter problem, Fill Area 2 was in good condition, with no erosion damage.

Mitigation Pond Reconstruction

□ ALRRF staff reported that excavation of the mitigation pond was complete, and planting has been planned for early Fall of this year.

Special Occurrences Log (last summarized late March 2018)

- ☐ May 29: An end-dump truck delivering treated auto shredder fluff had its trailer overturn while unloading. There were no injuries; the truck was the proper distance from other vehicles.
- May 30-31: An extreme high wind event occurred over these two days, with wind constant at 30 MPH and gusts to 50 MPH. The asbestos disposal site was closed for the day. The wind damaged several sections of permanent litter fence. Litter spread into Fill Area 2. Employees were placed on mandatory overtime to address the situation.

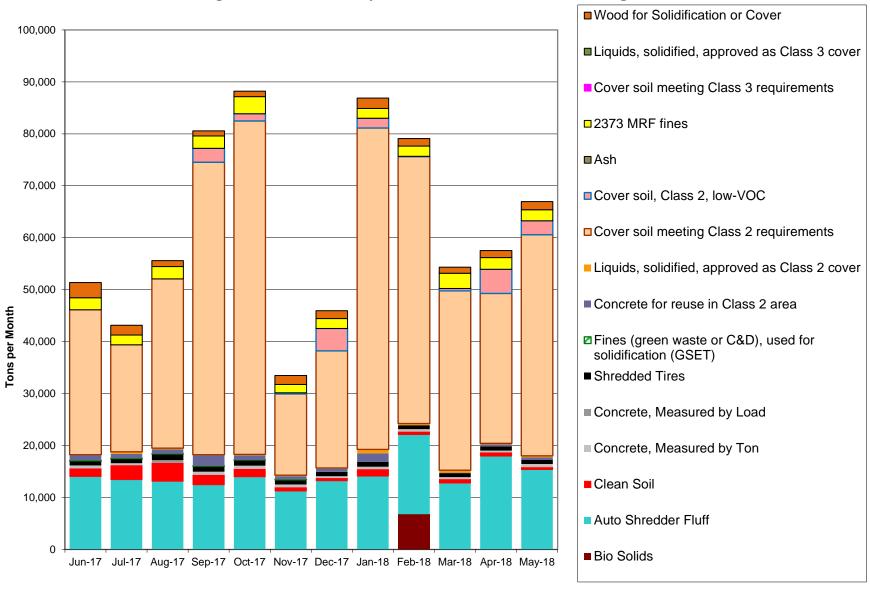
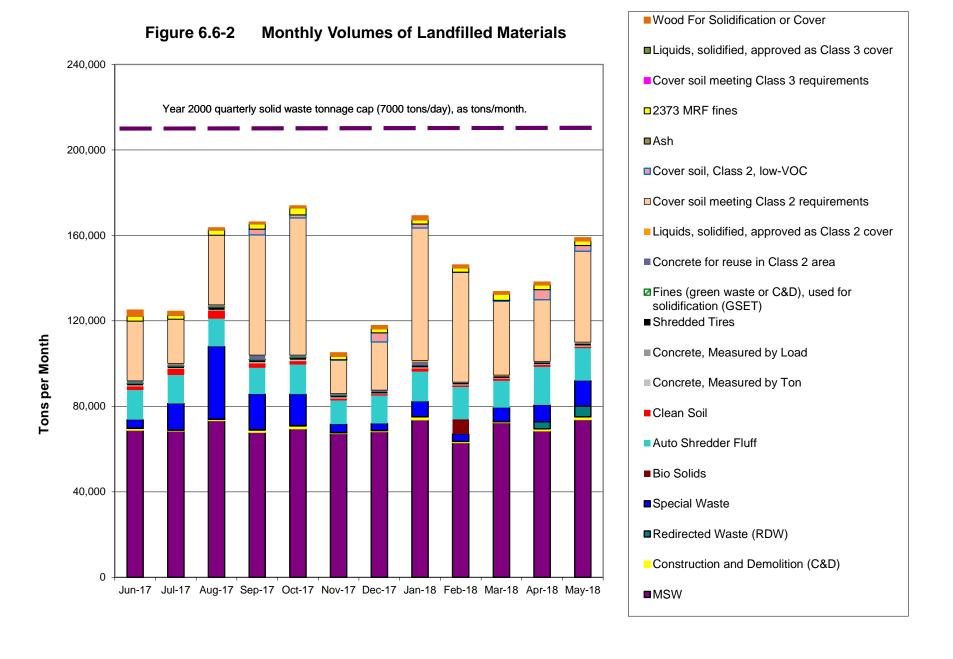


Figure 6.6-1 Monthly Volumes of Revenue-Generating Cover



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