



COMMUNITY MONITOR COMMITTEE

Altamont Landfill Settlement Agreement

AGENDA

www.altamontcmc.org

VOTING MEMBERS

Robert Carling
City of Livermore

Valerie Arkin
City of Pleasanton

Donna Cabanne
Sierra Club

David Tam
Northern California
Recycling Association

NON-VOTING MEMBERS

Enrique Perez
Waste Management
Altamont Landfill and
Resource Recovery
Facility

Arthur Surdilla / Wing Suen
Alameda County

Robert Cooper
Altamont Landowners
Against Rural
Mismanagement (ALARM)

STAFF

Judy Erlandson
City of Livermore
Public Works Manager

DATE: **Wednesday, July 14, 2021**
TIME: **4:00 p.m.**
PLACE: Online Zoom Meeting

Zoom Link: <https://us02web.zoom.us/j/85825460363>

Zoom dial in phone number: 1-669-900-6833 Webinar ID: 858 2546 0363

1. Call to Order
2. Introductions
3. Roll Call
4. Approval of Minutes (From April 14, 2021)
5. Open Forum This is an opportunity for members of the audience to comment on a subject not listed on the agenda. No action may be taken on these items.
6. Matters for Consideration
 - 6.1 **Responses to Committee Member Questions**
 - 6.2 **Cease and Desist Order R5-2021-0020**
 - 6.3 **Review of Documents on GeoTracker website**
 - 6.4 **Reports from Community Monitor**
 - 6.5 **Announcements (Committee Members)**
7. Agenda Building

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

The next regular Community Monitor Committee meeting is tentatively scheduled to take place at 4:00 p.m. on **October 13, 2021**, at 3500 Robertson Park Road, Livermore.

Informational Materials:

- Community Monitor Roles and Responsibilities
- List of Acronyms
- Draft Minutes of April 14, 2021

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 AND 28 CODE OF FEDERAL REGULATIONS PART 35), AND SECTION 504 OF THE REHABILITATION ACT OF 1973, THE CITY OF LIVERMORE DOES NOT DISCRIMINATE ON THE BASIS OF RACE, COLOR, RELIGION, NATIONAL ORIGIN, ANCESTRY, SEX, DISABILITY, AGE OR SEXUAL ORIENTATION IN THE PROVISION OF ANY SERVICES, PROGRAMS, OR ACTIVITIES. TO ARRANGE AN ACCOMMODATION IN ORDER TO PARTICIPATE IN THIS PUBLIC MEETING, PLEASE CONTACT THE ADA COORDINATOR AT ADACOORDINATOR@CITYOFLIVERMORE.NET OR CALL (925) 960-4170 (VOICE) OR (925) 960-4104 (TDD) AT LEAST THREE (3) BUSINESS DAYS 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 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 and included in the agenda packet available on the Community Monitor Committee web site <http://www.altamontcmc.org>.

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.

NOTICE OF PUBLIC MEETING

The City of Livermore Public Works Department, Environmental Services Division invites you to attend a public Community Monitor Committee Meeting pursuant to the Settlement Agreement governing the expansion of the Altamont Landfill and Resource Recovery Facility (ALRRF), the City of Livermore, the City of Pleasanton, the Sierra Club, the Northern California Recycling Association (NCRA), and Altamont Landowners Against Rural Mismanagement (ALARM). Given the international COVID-19 pandemic, and consistent with the California Department of Public Health's recommendations, Alameda County Health Orders and Governor Newsom's Executive Order N-29-20, the meeting will be held via video teleconference at July 14, 2021 with NO PHYSICAL LOCATION FOR PUBLIC ATTENDANCE. This teleconference meeting will be recorded. Please follow the instructions below to join the meeting remotely.

Zoom Link: <https://us02web.zoom.us/j/85825460363>

Zoom dial in phone number: 1-669-900-6833

Webinar ID: 858 2546 0363

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 2025) 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. 5.7.7);
- G. Counting trucks arriving at the Altamont Landfill (section 5.7.8); and
- H. Reviewing waste testing data and source information (section 5.7.9).

Waste Management of Alameda County's Responsibilities

Per the settlement agreement, Waste Management is responsible for:

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

List of Acronyms

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

<https://www.calrecycle.ca.gov/lea/acronyms>.

Updates will be provided as needed. This list was last revised on December 23, 2020.

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
CDFW – California Department of Fish and Wildlife (formerly California Department of Fish and Game or CDFG/DFG)
CDRRR – California Department of Resources Recycling and Recovery, or CalRecycle
CIWMB – California Integrated Waste Management Board (predecessor to CDRRR – see above)
CMC – Community Monitor Committee
DTSC - Department of Toxic Substances Control
CVRWQCB – Central Valley Regional Water Quality Control Board
DWR – Department of Water Resources
EPA – United States Environmental Agency
LEA – Local Enforcement Agency (i.e., County Environmental Health)
RWQCB – Regional Water Quality Control Board
SWRCB – State Water Resources Control Board

Waste Categories

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

Water Quality Terminology

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

Rev. 07/06/2021

Substances or Pollutants

ACM – asbestos-containing material

ACW – asbestos-containing waste

ADC – Alternative Daily Cover. For more information:

<https://www.calrecycle.ca.gov/lgcentral/basics/adcbasic>

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

CH₄ – methane

CO₂ – carbon dioxide

COD – Chemical Oxygen Demand – A measure of the degree to which a wastewater discharge can deplete the oxygen in a body of water.

DO – dissolved oxygen

HHW – household hazardous waste

LFG – landfill gas

LNG – liquefied natural gas

MEK – methyl ethyl ketone

MIBK – methyl isobutyl ketone

MTBE – methyl tertiary butyl ether, a gasoline additive

NMOC – Non-methane organic compounds

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

PFAS – Per- and polyfluoroalkyl substances

TCE - Trichloroethylene

TDS – total dissolved solids

TKN – total Kjeldahl nitrogen

TSS – Total Suspended Solids

VOC – volatile organic compounds

Documents

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

CDO – Cease and Desist Order

CoIWMP – County Integrated Waste Management Plan

CUP – Conditional Use Permit

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

MMRP – Mitigation Monitoring and Reporting Program

RDSI – Report of Disposal Site Information

RWD – Report of Waste Discharge

SRRE – Source Reduction and Recycling Element (part of CoIWMP)

SWPPP – Stormwater Pollution Prevention Plan

WDR – Waste Discharge Requirements (Water Board permit)

General Terms

ALRRF – Altamont Landfill and Resource Recovery Facility

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

BGS – below ground surface

BMP – Best Management Practice

CASP – Covered Aerated Static Pile (ASP) composting

CEQA – California Environmental Quality Act

CL – Concentration Limit (statistical limit of background concentrations for specific constituents in groundwater monitoring wells)

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

CY – cubic yards

GCL – geosynthetic clay liner

GPS – Global Positioning System

IC engine – Internal combustion engine

Rev. 07/06/2021

General Terms (continued)

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 14, 2021*

DRAFT

1. Call to Order

The meeting came to order at 4:00 PM.

Mr. Carling noted that pursuant to the provisions of the Brown Act and due to recent executive orders issued by the governor to facilitate teleconferencing in order to reduce the risk of COVID-19 transmission at public meetings, this meeting was being held via Zoom meeting platform. Mr. Carling further explained the process and protocols for the meeting.

2. Roll Call

Members Present: Robert Carling, City of Livermore; Valerie Arkin, City of Pleasanton; Donna Cabanne, Sierra Club.

Absent: David Tam, NCRA; Robert Cooper, Altamont Landowners Against Rural Mismanagement.

Staff: Judy Erlandson, Publics Works Manager, City of Livermore; Mukta Patil, Langan/Community Monitor; Maria Lorca, Langan/Community Monitor.

Others: Marisa Gan, Recycling Specialist, City of Livermore; Arthur Surdilla, Alameda County Department of Environmental Health (LEA); Ryan Hammon (LEA); Marcus Netz II, Senior District Manager, Altamont Landfill and Resource Recovery Facility (ALRRF); Michael Ganter, ALRRF (joined 4:15 p.m.).

3. Introductions

All those present introduced themselves.

4. Approval of Minutes of January 13, 2021 meeting

Ms. Arkin moved approval, Ms. Cabanne seconded, and the minutes were approved 3-0; committee member Tam absent.

5. Open Forum

There was no open forum discussion.

6. Matters for Consideration

6.1 Response to Committee Member Questions

Ms. Patil presented that the committee members did not have any questions for the CM in the January 2021 meeting.

6.2 Review of Reports Provided by ALRRF

Groundwater

Ms. Lorca provided an overview of the groundwater monitoring report. She stated that, the Phase 2 portion of Fill Area 2 began receiving wastes on April 1, 2020. Additionally, she noted that eight new monitoring wells were installed in Fill Area 2 in 2020 for detection monitoring purposes. Ms. Lorca noted that laboratory quality control for the Second Semiannual 2020 sampling events decreased with respect to the previous sampling event, and included issues attributed to cross-contamination and sample hold times. She further explained that the results from the Second Semiannual 2020 monitoring event were generally consistent and within ranges of previous detections observed at the wells. As requested by the CVRWQCB, further evaluation of the water quality changes observed in PC-1C and the Fill Area 1 upgradient E-20B corrective action area was completed and Geosyntec concluded that inorganic compound groundwater quality changes observed in E-20B, MW-12, and PC-1C since 2017 were likely related to storm water and are not associated with landfill gas release in the area. All newly installed wells were sampled during the Second Semiannual 2020 event. MW-26 data showed above reporting limit (RL) detections of benzene; WMAC notified the CVRWQCB of these initial VOC detections on January 22, 2021 and noted that resampling events would be scheduled.

Ms. Cabanne appreciated the graphs that indicated the downward trend lines as well as the map of the monitoring well locations. Ms. Cabanne asked if there was a response on Geotracker from the CVRWQCB in regards to the letter sent on January 22, 2021 about the above RL detection of benzene in MW-26. Ms. Patil noted there had been no response. Ms. Cabanne asked if the CM could update the committee about the response during the July 2021 meeting. Ms. Patil confirmed.

Ms. Cabanne asked if the CM had received any information or a timeline regarding sampling requirements for PFAS based on the California state PFAS baseline study. Ms. Patil explained the CMC did not know of updated regulatory requirements on PFAS sampling by the regulatory agencies. However, she explained that there are ongoing guidance documents in preparation and the EPA is planning on developing a Standard Operating Procedure in Q3 2021. Ms. Patil noted that she assumes most regulatory agencies are waiting on the EPAs Standard Operating Procedure to provide more guidance on data collected. Ms. Cabanne noted some deep wells at airports, landfills, and agricultural fields have been impacted by PFAS in the Tri-Valley; Pleasanton has one deep well that has been taken offline due to PFAS. Ms. Cabanne continued by stating only a small amount of PFAS could impact a well long term and that is important to convey to the EPA the significance of creating sampling requirements, specifically to protect the communities most affected. Ms. Patil responded that the CM will research any updates on PFAS sampling requirements.

Ms. Arkin seconded Ms. Cabanne's comments about the PFAS issue, specifically about the well that had to be shut down in Pleasanton and the importance about getting sampling information. Ms. Arkin asked why there was a VOC trend increase in EB-20B. Ms. Lorca explained that in that area, many of the concentrations of VOCs have been attributed to accumulation of the landfill gas. She continued by stating that in the past, extraction of the landfill gas has kept VOC concentrations lower in groundwater and that different extraction rates could have different effects on VOC concentrations. Ms. Patil added that corrective action wells have been implemented and have been in service within the vicinity of EB-20B to draw out landfill gas from that area in order to prevent the landfill gas from getting into the groundwater. Ms. Arkin asked if there were any new VOCs, other than VOCs detected in the past few years. Ms. Patil stated that PFAS is the most important issue currently. Given their health and safety concerns of being carcinogens, tetrachloroethene (PCE) and trichloroethene (TCE) (which may be linked to Alzheimer's) remain to be the main concerns.

Ms. Arkin asked if an upward trend in VOCs continues, at what point is a corrective action necessary and what corrective action would be implemented. Ms. Patil explained that none of the concentrations have been directly associated with leachate but rather attributed to landfill gas and the corrective action would be to add additional wells in the vicinity and have more gas extracted and treated. Ms. Patil also noted that the CVRWQCB evaluates how far along contaminants have traveled, so corrective action would include installing other wells to see if concentrations were found down gradient. Ms. Lorca added that the CVRWQCB asked that wells be installed down gradient to EB-20B, one of which was EB-27. No VOC concentrations detected in EB-20B were detected in the down gradient well EB-27; therefore consultants attributed the concentrations to landfill gas and it appeared based on data that it had not migrated down gradient. Ms. Patil stated that most of the concentrations are still low and that many are estimates that the lab has flagged noting the results were reported between the MDL and RL. Ms. Lorca added that if there were VOCs detected above RL and it was not due to landfill gas, the potential corrective action would be to extract potentially impacted groundwater down gradient to ensure the movement ceased, but that there is no indication that this is the case at ALRRF.

Air Emissions Report

Ms. Patil summarized that 19 new gas wells were brought online during the reporting period and 12 wells were decommissioned. Two wells showed high temperatures during the reporting period, and 21 wells showed oxygen exceedances, nine of which were corrected, eight were decommissioned, and the remaining three had exceedances during the initial monitoring event and remain under investigation. Ms. Patil further explained that during the second quarter, there were 33 exceedances of methane surface emissions, but during the third quarter, the exceedances decreased to 23. All of the corrective actions to block these emissions were successful and passed their 10-day and 30-day follow-up tests. Ms. Patil also explained that there were no emission control device tests performed during the second and third quarters, however the tests performed during the first quarter showed all devices passed except the main flare A-16. No corrective action was discussed in the report but the CM would keep an eye on the flare. Lastly, Ms. Patil noted that there were no methane exceedances during this monitoring event, that landfill gas wells nearest to groundwater monitoring wells E-05/E-

07, E-20B and MW-4A continued to be operated with as much vacuum as they would tolerate without pulling in air from above the ground surface, and that Figure 6.2.2 shows that the devices except some brief unplanned interruptions operated as usual during the reporting period.

Ms. Cabanne asked what happens to flare A-16 since it failed the emission control device sources test and asked if it would be replaced. Ms. Patil explained that the report did not discuss any corrective actions implemented and since it was a while ago, CM assumed it was captured but would continue monitoring it. Ms. Patil stated that it would most likely not get replaced but that corrective actions would be implemented to ensure it was within the permitted threshold. Ms. Cabanne asked if this was something the CM would report on during the July 2021 meeting. Ms. Patil confirmed and noted that the CM would continue to monitor to see if corrective actions are completed and would communicate with ALRRF if necessary.

Ms. Cabanne understood that the EPA was supposed to come out with more restrictive air standards in the summer of 2020 and asked if they were passed and if they would be used during air monitoring events at ALRRF. Ms. Patil responded that the CM is not aware of the update but that they would investigate. Ms. Cabanne requested to have an update on if air standards were implemented, how strict they were, and how it would affect air monitoring at ALRRF at the July 2021 meeting. Ms. Patil noted that that would be possible.

ET Cover Report

Mr. Carling noted the package for the ET Cover Report was missing. Ms. Patil explained that it was uploaded as a standalone document on the CMC site and that the CM would issue a revised packet.

Ms. Patil summarized that the 10-acre ET cover was completed in December 2018 and that there is a 4-year monitoring period after which the performance would be reported; slated for 2024. Ms. Patil further summarized the construction of the ET cover, the quarterly site visits to inspect the cover, and vegetation across the cover. After a rain event, ponding was observed in a small area right off of the final cover limit. Ms. Patil noted that ALRRF's consultant recommended that the area around the bench, right outside the cover be regraded to promote drainage of runoff. Ms. Patil explained that ESA reviewed the report, work plan and construction quality assurance (CQA) document for the ET Cover area and recommended that the timing of the percent cover estimate be based on field observations and aerial imagery to occur after the rainy season, in February to April, May at the latest to provide a more accurate account of plant cover present and that it would be helpful for future reports to include the potential presence of invasive species. Ms. Patil noted that the report points to a lack of vegetation cover being the primary factor of infiltration at all four monitoring locations exceeding the depth of the cover. ALRRF and ESA recommended that for areas with sparse vegetation, soils should be clarified and re-hydroseeded and then closely monitored to ensure vegetation is fully established. Ms. Patil summarized that the report also noted that root depths should be expanded to include significant crack depths and that a stormwater sampling location would be installed at the outlet of ditch 2 to test for VOCs. Ms. Patil noted that ESA recommended annual reports be completed faster so that any recommendations could

be implemented before they become more expensive and challenging and that ESA and Langan would be going to ALRRF for a quarterly site visit on April 15, 2021.

Ms. Cabanne noted that 2019 was a wet year, 2020 was dry, and that 2021 will also be dry. She further explained that failures in southern California were caused by cracks due to dry soils and that if 2021 will be a dry year and cracks develop, the vegetation roots will not establish and hold the cover. Ms. Cabanne requested that during the site visit that the CM observe the cracks on cover to see how dry the soil is and how deep the cracks are as well as note if there are any non-native species.

6.3 Review of Documents on GeoTracker

The review began with a verbal summary of Langan's memo by Ms. Patil; items from the GeoTracker tables were verbally summarized. Ms. Cabanne requested an update on the response to the January 11, 2021 letter regarding concentration limits, where the CVRWQCB notes that Table 8 was no longer adequate, as well as an update about whether the outdated bladder at well E-05 would be replaced during the July meeting. The CM team responded that they would keep tracking items on Geotracker and responses from WMAC to these items.

6.4 Reports from Community Monitor

Ms. Lorca explained that due to Shelter-in-Place order and COVID-19 pandemic, the Community Monitors had not been allowed to visit the Landfill during the period. The CM had coordinated a visit to for the next day. During this period, the CM has relied on reports from LEA site inspections. Ms. Lorca summarized the summaries of LEA inspections, tonnage reports, as well as figures with tonnages plots.

Ms. Cabanne asked Mr. Surdilla and Mr. Hammon about where the treated wood waste was coming from. Mr. Surdilla responded that the DTSC had a regulation that was sunset which made it mandatory for treated wood waste to be disposed at Class I facilities throughout the state but did not allow it at Class II disposal facilities. Mr. Surdilla explained that people did not have anywhere to bring treated wood waste at the time and that ALRRF received a variance. However, he was not sure if that is the reason for the increase in treated wood waste. Ms. Cabanne asked how ALRRF got the variance since treated waste should go to a toxic waste facility. Mr. Surdilla responded that treated wood can be disposed of at a Class II facilities if they have approval from the CVRWQCB. Mr. Carling noted that after going to a Stop Waste meeting that there was only one other facility that was given an exception. Ms. Cabanne asked why ALRRF was given the variance. Mr. Surdilla responded that the variances were issued by the DTSC and are valid for six months. Ms. Cabanne asked when the variance was given and when it expires since it is Class I material that should not be coming to ALRRF. Mr. Hammon responded that the effective date was March 8, 2021 and that it expires September 4, 2021. Ms. Cabanne asked Mr. Surdilla to follow up with the DTSC about this. Mr. Surdilla noted that he would send the committee the DTSC website which has a section about the regulation of treated wood waste that was sunset and what facilities would be able to do with the waste.

Ms. Cabanne noted that ALRRF applied for an emergency waiver for fire debris in December and that it should be expiring. Mr. Surdilla noted the last update was given on January 29 and the expiration should be at the end of April unless ALRRF decided to renew. Ms. Cabanne requested Mr. Surdilla give an update about the renewal during the

July meeting. Mr. Surdilla confirmed and noted that Santa Clara landfill requested assistance from local landfills to take materials and that he would send the committee information about the waiver extension as well as a letter from CalRecycle to request LEA to approve the waiver. Ms. Cabanne noted that in the fires, debris can have materials that should not be coming to ALRRF and asked whether there was any testing on the fire debris loads. Mr. Surdilla responded that testing is up to the discretion of CalRecycle who observes the debris prior to shipping it out to landfills and noted that he could provide documentation and the contact information for the CalRecycle employee involved with reviewing the fire debris.

Ms. Cabanne asked why Class II cover soil increased to 21,000. Ms. Patil responded that this was likely due to construction activities and once the Class II file review was complete, the CM could provide additional information. Mr. Nettz added that there have been larger construction jobs approved in the area and the increase in Class II is due to the groundbreaking at many construction projects. He confirmed that it was not special waste. Ms. Cabanne noted that there was a large jump in February 2021 under construction a debris and asked if it was due to construction. Mr. Nettz responded that that was due to fire debris that is coded when it comes onto site as C&D for internal purposes.

6.5 Announcements

No announcements were made.

7. Agenda Building

No items were added to future agenda.

8. Adjournment

The meeting was adjourned at 5:30 p.m. The next meeting will be held on Wednesday July 14, 2021 at 4:00 p.m. potentially at the Livermore Maintenance Services Center at 3500 Robertson Park Road or presented virtually using Zoom.

501 14th Street, 3rd Floor Oakland, CA 94612 T: 510.874.7000 F: 510.874.7001

To: ALRRF Community Monitor Committee

From: Langan – Community Monitor

Date: July 6, 2021

Re: **CMC Meeting of 7/14/21 - Agenda Item 6.1 - Responses to Committee Members' Questions**

PFAS MONITORING

At the April 14, 2021 meeting Ms. Cabanne and Ms. Arkin expressed concern about the lack of Per- and polyfluoroalkyl substances (PFAS) monitoring at the Landfill. Ms. Cabanne asked if there are any regulatory updates on monitoring requirements.

The State and Federal regulators have not updated the requirements for landfills yet. In 2019, the State Water Board (SWRCB) issued an investigative order to determine whether groundwater at landfills were impacted by PFAS¹. The results from these investigations have shown that:

- There were differences in long chain for historical impacts vs. newer short chains were noted in the landfill investigations;
- At landfill sites, there were order of magnitude differences in detections in leachate vs groundwater;
- State Water Board concluded that leachate collection systems are effective but imperfect;
- PFAS detected in groundwater/surface water at airports are orders of magnitude greater than PFAS in groundwater at landfills.

Similar investigative orders have been issued for airports, chrome plating facilities, publicly owned treatment works, refineries and bulk fuel terminals.

Current efforts have been directed to sample and report PFAS for public water systems. The State Water Board has established drinking water notification levels and response levels for perfluorooctane sulfonic acid (PFOS), perfluorooctanoic acid (PFOA) and perfluorobutane sulfonic acid (PFBS). The SWRCB has requested the Department of Toxic Substances Control (DTSC) Office of Environmental Health Hazard Assessment's (OEHHA) recommendation in developing notification levels for six additional PFAS, which have been detected in groundwater wells in California. The United States Environmental Protection Agency (EPA) is planning on developing a Standard Operating Procedure in the third quarter of 2021.

The community monitor will continue to track updates on PFAS regulations and monitoring requirements.

¹ Additional information on PFAS is available in the SWRCB PFAS site:
<https://www.waterboards.ca.gov/pfas/>

EMISSIONS EXCEEDANCES AT FLARE A-16

At the April 14, 2021 meeting Ms. Cabanne requested to follow up regarding Flare A-16 emissions failure reported in the first quarter of the 2020 reporting period. The Community Monitor reached out to Waste Management of Alameda County (WMAC) to gain clarification on the failure and reviewed the Flare A-16 emission control device test results. The Community Monitor found that the failure was misreported in the April 14, 2021 packet. Flare A-16 during the 2020 reporting period passed all emission control tests. This was further supported by documentation from WMAC that showed Flare A-16 did not fail Non Methane Organic Compounds (NMOC) emission in 2020.

EPA ISSUED REVISED AIR STANDARDS

At the April 14, 2021 meeting, Ms. Cabanne noted that the EPA issued revised air standards in 2020. She requested the Community Monitor review the revised standards and summarize the implications for Altamont Landfill Resource Recovery Facility (ALRRF).

The Clean Air Act requires EPA to set National Ambient Air Quality Standards (NAAQS) for six common air pollutants (also known as "criteria air pollutants")².

On December 7, 2020, EPA announced that based on the thorough review of the air quality criteria and the set NAAQS for particulate matter (PM), it would retain, without revision, the existing primary (health-based) and secondary (welfare-based) NAAQS for PM. The final action went into effect December 18, 2020. On June 10, 2021, EPA announced that it will reconsider the December 2020 decision. The EPA expects to issue a proposed rulemaking in summer 2022 and a final rule in Spring 2023.

On December 23, 2020, EPA announced that based on the thorough review of the air quality criteria and the national NAAQS for photochemical oxidants including ozone (O₃), it would retain, without revision, the existing primary (health-based) and secondary (welfare-based) NAAQS for O₃. The final action went into effect December 31, 2020.

The remaining four NAAQS were not reviewed in 2020. The latest revisions were issued in 2011 for carbon monoxide, in 2016 for lead, in 2018 for nitrogen dioxide, and in 2019 for sulfur dioxide.

ALRRF should not be affected by this revision as the EPA announced it would retain, without revision, the existing primary and secondary NAAQS for PM and ozone. Once the PM standards are revised by EPA, the Community Monitor will evaluate implications due to updated standards.

² <https://www.epa.gov/naaqs>

ET COVER OBSERVATIONS FROM SITE VISIT

At the April 14, 2021 meeting, Ms. Cabanne wanted to learn about how dry the soil was at the Evapotranspirative (ET) cover, the depth and extent of cracks in the soil, and information about invasive species.

During the April 15, 2021 site visit, the Community Monitor team focused on the ET cover area. In general, most of the cover area had vegetation, with the exception of some patches of non-vegetated areas, which are included in the summary of ESA Site Inspection (Agenda Item 6.4). Native species were observed throughout the ET cover.

There were only a few cracks observed on the surface, which were less than a 1/8-inch wide and appeared to be shallow.

TREATED WOOD WASTE VARIANCE

At the April 14, 2021 meeting, Ms. Cabanne voiced her concern on the acceptance of Treated Wood Waste (TWW) at the ALRRF.

As a result of the sunset of Health and Safety Code, Section 25150.7, on December 31, 2020, TWW can only be disposed in Class I hazardous waste landfills. Municipal solid waste landfills can no longer accept TWW for disposal, except as authorized by the DTSC TWW Disposal Facility Variance (TWW Variance).

At the meeting, Mr. Surdilla clarified that treated wood can be disposed of at Class II facilities if they have approval from the Water Board and if they have received the TWW Variance from the DTSC. Mr. Carling noted that in a recent Stop Waste meeting, he learned that only one other facility was given a variance.

The TWW Variance authorizes the operators to accept and dispose of TWW in a manner consistent with the previously approved alternative management standards. DTSC expects this type of variance to apply to landfills that were accepting TWW prior to January 1, 2021³. The TWW Variance is valid for six months or until additional statutory, and regulatory, requirements relating to the management of TWW become effective, whichever is sooner. The TWW Variance can be extended once for a period of up to six months.

ALRRF received the DTSC variance on March 8, 2021, which expires on September 4, 2021. In a letter dated April 19, 2021 the CVRWQCB clarifies that Order No. R5-2016-0042-1 authorizes ALRRF to accept TWW⁴, and therefore ALRRF may continue to accept TWW for disposal upon compliance with the DTSC standards.

³ <https://dtsc.ca.gov/treated-wood-waste-variances/>

⁴ https://documents.geotracker.waterboards.ca.gov/regulators/deliverable_documents/2970365226/Altamont%20Landfill%20TWW%20Variance%20Letter_Final.pdf

The DTSC website lists 49 landfills in the state and two landfills in Alameda county (ALRRF and Vasco Road landfill) that have received a TWW Variance.

WILDFIRE EMERGENCY WAIVER

At the April 14, 2021 meeting, Ms. Cabanne requested updates on the Emergency Waiver of Standards to dispose wildfire debris at ALRRF. During the meeting, Mr. Surdilla noted that Santa Clara landfill requested assistance from local landfills to receive wildfire-related materials, and mentioned he would send the committee information about the Emergency Waiver extension as well as a letter from CalRecycle to request the LEA to approve the waiver.

Per our review of the CalRecycle website, the original Emergency Waiver of Standards to dispose wildfire-related debris was approved by the LEA on September 30, 2020, and has been extended on January 29, 2021 and May 31, 2021. The most recent extension was granted for 120 days (i.e. until September 28, 2021).

In the Emergency Waiver Extension Request, WMAC specifies that ALRRF may receive fire debris from wildfires that burned in the following counties:

- Bay Area counties: Santa Clara, Alameda, Contra Costa and San Mateo counties (CZU Complex Fire)
- Outside of the Bay Area counties: San Joaquin and Stanislaus counties (SCU Lightning Complex Fire), Santa Cruz (CZU Complex Fire), and Monterey County (River Fire and Carmel Fire).

The ALRRF's Conditional Use Permit (CUP) limits the facility to accept waste for disposal from within the nine Bay Area counties⁵ only. WMAC notes that ALRRF was approached to accept fire debris from outside the nine Bay Area counties. CalRecycle issued a letter dated January 20, 2021 that clarifies ALRRF is approved to accept fire debris from these counties due to the emergency. The CalRecycle letter specifies that the Governor's Proclamation of a State of Emergency supersedes the out-of-county disposal limitations imposed to ALRRF.

During the month of April, ALRRF received 1,144 tons from fire debris originated in Santa Clara and Stanislaus counties.

⁵ Alameda, Marin, Sonoma, Napa, Solano, Contra Costa, San Mateo, San Francisco and Santa Clara.

501 14th Street, 3rd Floor Oakland, CA 94612 T: 510.874.7000 F: 510.874.7001

To: ALRRF Community Monitor Committee

From: Langan – Community Monitor

Date: July 6, 2021

Re: **CMC Meeting of 7/14/21 - Agenda Item 6.2 - Cease and Desist Order (CDO) R5-2021-0020**

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

Requirements Outlined in the CDO include the following:

Implementation of Fill Area 2 (FA2) Unit 1 Detection Monitoring Program

The CDO requires the Discharger to implement a CVRWQCB approved detection monitoring network. The Discharger has proposed and installed monitoring devices for FA2, nevertheless the CDO notes that it does not meet all the requirements outlined in the WDRs.

The following requirements will resolve this item:

- Installation of interim point of compliance (POC) wells in FA2 Unit 1.
- Installation of final permanent FA2 limit wells.
- Implementation of a Water Quality Monitoring and Response Program for FA2 Unit 1.

Completion of the MW-4A Evaluation Monitoring Program

In May 2017, MW-4A, located in the northeastern limit of FA1, reported exceedances of bicarbonate, calcium and five volatile organic compounds (VOCs). Additional sampling confirmed a release in this area, which has been attributed to landfill gas. The Discharger has implemented focused extraction of landfill gas in this area and conducted additional investigation to define the extent of the release. A similar release had been documented in the vicinity of E-20B, which had implemented similar corrective actions. The CDO requires the Discharger to complete the MW-4A evaluation monitoring program addressing the following items:

- Monitoring of the nature and extent of the documented releases at MW-4A and E-20B
- Monitoring the effectiveness of corrective action near MW-4A and E-20B

- Establishment of a detection monitoring program along the northern and eastern (upgradient) limits of FA1

Continued implementation of the Fill Area 1(FA1) Corrective Action Program

The Discharger has chosen landfill gas extraction as the corrective action measure to address landfill gas effects (as described above). The CDO requires continued implementation of the corrective action program, and to submit the following:

- Report outlining the Corrective Action Program (landfill gas extraction)

Continued operation of solidification basins

Title 27 and the WDRs require that the solidification process does not result in the introduction of liquids into a solid waste management unit (WMU) in excess of the moisture holding capacity of the unit. The solidification basins at ALRRF are operated atop of FA1 Unit 2. These solidification basins do not comply with the WDR requirements. To bring this item back into compliance, the CVRWQCB included the following requirements in the CDO:

- The operation of the two solidification basins atop of FA1 Unit 2 can continue until new solidification basins are constructed
- The new solidification basins shall be moved outside of the existing WMUs, shall be completed as double lined containment systems, with a leachate recovery system (LCRS) installed between the liners, and a monitoring system

Reporting Timeline

The timeline for the requirements and deliverables requested in the CDO are summarized below:

- Update the Sampling and Analysis Plan for the interim POC detection monitoring program no later than 90 days after adoption of the CDO (July 21, 2021).
- Revise the background water quality values and update the concentration limits (CLs) no later than one year after adoption of the CDO (April 21, 2022).
- Work plan to install the groundwater monitoring wells (interim and final) for FA2 no later than 90 days after adoption of the CDO (July 21, 2021).
- Work plan to install the soil gas monitoring wells (interim and final) for FA1 and FA2 no later than 90 days after adoption of the CDO (July 21, 2021).
- Report installation within 60 days of installing any new groundwater monitoring well or soil gas monitoring well.
- Work plan to conduct surface water monitoring for surface water flowing out of FA2 no later than 90 days after adoption of the CDO (July 21, 2021).
- Notify the CVRWQCB 30 days prior to removal of interim monitoring devices.
- Document the results of the MW-4A evaluation monitoring program (including groundwater and soil gas sampling) in separate corrective action status reports to be submitted semi-annually by 1 August and 1 February each year.
- Work plan to install the groundwater and soil gas monitoring network along the northern and eastern limits of FA1 no later than 60 days after adoption of the CDO (June 21, 2021).

This work plan was submitted on May 10, 2021 and approved by the CVRWQCB on May 19, 2021.

- Update corrective action financial assurance cost estimates for FA1 and FA2 no later than 90 days after adoption of the CDO (July 21, 2021).
- Report outlining the LFG extraction wells operations as part of the Corrective Action Program to address the LFG impacts outside the limits of FA1 no later than 30 days after adoption of the CDO (May 22, 2021). This report was submitted on May 21, 2021.
- Submit a Report of Waste Discharge to install off-waste liquid solidification basins no later than 180 days after adoption of the CDO (October 19, 2021).
- Report the installation and operation of new off-waste footprint solidification basins no later than 12 months from approval of the Report of Waste Discharge (depending on approval, estimated after November, 2022).

The CDO also provides items associated with the Composting General Order, which have been included below for information.

- The leachate storage capacity at the composting facility has to comply with the requirement for storage for the 100-year wet year. The Discharger is required to submit an updated Permit Design Package for Contact Water Pond 2 or an alternative treatment or storage approach within 90 days from adoption of the CDO.
- The composting general order regulates the characteristics of detention ponds at composting facilities. The CASP detention pond was designed to meet the 25-year, 24-peak storm event. The CDO requires additional compost leachate storage capacity.

The Community Monitor will continue to review items on Geotracker, and provide update on the necessary work and the deliverables requested by CVRWQCB in the CDO.

THIS PAGE INTENTIONALLY BLANK

501 14th Street, 3rd Floor Oakland, CA 94612 T: 510.874.7000 F: 510.874.7001

To: ALRRF Community Monitor Committee

From: Langan – Community Monitor

Date: July 6, 2021

Re: **CMC Meeting of 07/14/2021 – Agenda Item 6.3 – Review of Documents on Geotracker Web Site**

This is the abridged version of this memorandum. It is limited to new items reported in Geotracker since the previous Community Monitor Committee packet for the April 2021 meeting was completed, plus any prior items that provide useful background information for the new items. The complete, current version of this Review of Documents is located on the Community Monitor Committee web site and can be accessed using this link¹.

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

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

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

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

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

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

MEMO

Topic List

Landfill Operations

- [Revised Configuration and Phasing Schedule for Fill Area 2](#)
- [Refuse Disposal Operations](#)

Monitoring Wells

- [Concentration Limits for Monitoring Wells](#)
- [New or Pending Monitoring Wells](#)
- [Exceedances in Monitoring Wells](#)
- [Corrective Action](#)

Other Topics

- [CVRWQCB Orders](#)
- [CVRWQCB Inspections](#)
- [CASP Operations – For Information Only](#)

LANDFILL OPERATIONS

Revised Configuration and Phasing Schedule for Fill Area 2

[Topics](#)

From	Format Date	Key Point(s)
ALRRF	Letter Mar 18, 2020	This letter transmits a notification by WMAC describing the schedule for commencing landfill operations in Fill Area 2 Phase 2/2B. WMAC anticipated beginning waste filling activities in Phase 2 during the week of March 23.
ALRRF / Geosyntec	Phase 3 Low Permeability Soil Liner Report May 20, 2020	Report of Phase 3 low permeability soil liner (LPSL) evaluation for the Phase 3 containment cells in Fill Area 2 at ALRRF. The evaluation confirms that the representative soils tested from Stockpile #6A2 and the Phase 3 field test pad are consistent with their index properties documented in the LPSL test pad report. Therefore, the results of the 2019 LPSL test pad report are applicable for the Phase 3 construction. Geosyntec recommended three steps that are consistent with previous recommendation for native soils including geotechnical consideration for compaction control and the development of a comprehensive CQA.
CVRWQCB	Meeting Memo March 11, 2021	The letter summarizes discussion about the CVRWQCB Staff's Phase 3 CQA report review memo, the expected response from WM, and next steps in regard to Phase 3 approval and the design and CQA reporting for Phase 4 that were verbally discussed during a conference call on March 11, 2021.

MEMO

From	Format Date	Key Point(s)
CVRWQCB	Report March 17, 2021	<p>FA2 Phase 3 CQA Inspection Report summarizes the observations during the inspection. The summary concludes that the extent of FA2 Phase 3 observed conforms to the as-builts provided in the January 15, 2021 CQA Report. In addition, point of compliance wells required for Phase 3 have been installed and the Discharger (ALRRF) is actively working to install additional monitoring wells along the final limit of FA2.</p> <p>Based on the CVRWQCB staff’s review of the CQA Report, the installation of POC and final FA2 edge of waste wells, the results of this final required construction inspection, and the submittal of proposed Water Quality Protection Standards (WQPS) and updated Financial Assurances, the Discharger has met the requirements outlined in the WDRs and Title 27 for waste to be placed in FA2 Phase 3, once the connection between the two units has been completed and the Discharger receives, under separate cover, a final FA2 Phase 3 approval letter from CVRWQCB staff.</p>
ALRRF/ Geosyntec	Report April 19, 2021	<p>This final report, Addendum to Report of CQA, describes the CQA activities documenting completion of five items related to the construction of the Phase 3 containment cell in Fill Area 2 at ALRRF. The report addendum was prepared by Geosyntec, who conclude that construction was completed in conformance with the approved design report, construction documents, CQA Plan, and recommendations issued during construction. ALRRF requests review and approval of this report addendum from the CVRWQCB.</p>
CVRWQCB	Letter April 22, 2021	<p>This letter confirms the CVRWQCB’s review of the data and reports submitted, the final inspection, as well as the updated WQPS and financial assurances, as required by the WDRs, the construction of FA2 Phase 3 is complete and approved.</p>

MEMO

Refuse Disposal Operations

[Topics](#)

From	Format Date	Key Point(s)
CVRWQCB	Letter April 19, 2021	Letter authorizes WMAC to accept treated wood waste (TWW) for disposal at ALRRF. The DTSC granted a variance for ALRRF on March 8, 2021. The conditions of the variance provide an alternative set of management standards in lieu of the requirements for hazardous waste. The CVRWQCB notes that Order No. R5-2016-0042-1 authorizes ALRRF to accept TWW, and confirms ALRRF may continue to accept TWW for disposal conditionally upon compliance with the alternative management standards set out in the DTSC's TWW Disposal Facility Variance.

MONITORING WELLS

Concentration Limits for Monitoring Wells

[Topics](#)

From	Format Date	Key Point(s)
CVRWQCB	Letter Jan 11, 2019	Concurred with most of the limits proposed in the October report but noted that for wells PC-2A and WM-2, not enough samples were taken. Prior limits to remain until four samples taken from each well. Also adjusted downward 17 limits at 7 different wells, excluding outliers in historical data.
ALRRF	Letter Feb 15, 2019	Provided a summary table of agreed-upon concentration limits for monitoring wells in FA1 and FA2.
ALRRF/ Geochem Applications	Report Jul 31, 2019	For FA2 monitoring wells not yet installed, provides proposed concentration limits that would be applicable immediately after well installation, so that groundwater quality can be evaluated as soon as the wells are in service. Methodology is based on values from several nearby existing wells, as discussed between ALRRF and CVRWQCB staff.
ALRRF/ GeoChem Applications	Letter Report Feb 21, 2020	Provided additional concentration limits for both the alluvial and unweathered bedrock zones for monitoring wells in FA2, based on combined interwell/intrawell statistical analysis, which may be used to define concentration limits as soon as a new well is installed.

MEMO

From	Format Date	Key Point(s)
ALRRF/ GeoChem Applications	Report July 27, 2020	Provided additional intra-well concentration limits for monitoring parameters and constituents of concern for Fill Area 2 compliance monitoring well MW-17R that was installed in 2018 to monitor the Fill Area 2 Class II Surface Impoundment (LSI-3). The concentration limits are based on monitoring data collected during the 2018-2019 time period.
ALRRF/ GeoChem Applications	Letter & Report October 26, 2020	2020 2-year update to groundwater concentrations limits (CLs) for monitoring parameters for Fill Areas 1 and 2. The updated CLs are based on historical baseline monitoring data through June 2020 for each constituent and were statistically calculated using the intrawell data evaluation procedure. The 2020 updated CLs were similar to the previous CLs, which had been presented in 2016 and 2018.
CVRWQCB	Letter January 11, 2021	<p>Letter requests ALRRF to submit an amended WQPS Report by April 1, 2021 as strict use of Table VIII is no longer adequate to comply with the MRP for the following reasons:</p> <ol style="list-style-type: none"> 1. Table only lists WQPS that were approved in 2016 when the MRP was adopted 2. The MRP was adopted before waste was placed in FA2 3. Multiple new FA2 detection monitoring program wells have been installed since the MRP was adopted 4. Section C.1 of the MRP state the WQPS reports are to include “all monitoring points consistent with this Order”. The MRP also discusses the addition of new wells and the calculation of additional concentration limits. <p>The letter also states all additional data, documents, and reports that must be included in the amendment.</p>
ALRRF/ WMAC	Letter March 31, 2021	RWQCB letter dated 11 January 2021 requests WMAC to prepare an Amended WQPS Report that provides statistical concentration limits for 20 additional monitoring wells at the site. For regulatory, technical and practicality reasons, WMAC believes the request requires further discussion and respectfully requests to engage in additional dialogue.

MEMO

New or Pending Monitoring Wells

[Topics](#)

From	Format Date	Key Point(s)
ALRRF / Geosyntec	Letter & Report October 29, 2020	Provides a report documenting the installation of eight FA-2 groundwater monitoring wells from September 15 to 21, 2020. The new monitoring wells were installed downgradient of the planned liner extent of FA2 Phase 3 (MW-25 and MW-26) and the final anticipated FA2 lateral extent (MW-34A/B, MW-35A/B and MW-44A/B). In addition, two monitoring wells, MW-23A/B were destroyed on September 14 and 15, 2020. The monitoring wells and gas probes were installed and destroyed in accordance with the February 25, 2020 Fill Area 2 Phase 3 Monitoring Well Installation and Destruction Work Plan (Geosyntec 2020).
ALRRF/ Geosyntec	Work Plan Addendum November 11, 2020	Addendum to the February 25, 2020 FA-2 Phase 3 Monitoring Well Installation and Destruction Work Plan. Two additional monitoring well clusters (MW-45 and MW-46) were proposed to be installed, at the conceptual planned FA2 final buildout extent in the thalweg of the valley as requested by the CVRWQCB. One well in each well cluster will be installed in the first encountered groundwater, which is anticipated to occur in weathered rock. A second well will be installed at each well cluster in groundwater in unweathered rock.

MEMO

From	Format Date	Key Point(s)
CVRWQCB	Letter November 18, 2020	<p>CVRWQCB response to November 11, 2020 <i>Fill Area 2 Phase 3 Monitoring Well Installation and Destruction Work Plan Addendum</i>. CVRWQCB approved the installation of wells MW-25 and MW-26 as proposed in the Addendum, Work Plan, and SOP with the following conditions:</p> <ol style="list-style-type: none"> 1. As noted in the Work Plan, if first groundwater occurs in alluvium, each cluster well shall be completed with three screened intervals, with the first well screen installed across the water table in the alluvial zone, followed by wells screened in the underlying weathered and unweathered bedrock. Given groundwater has been observed in nearby well P-2 as shallow as 2.80 feet below ground surface, a third shallow alluvial screened zone is expected for cluster wells MW-45 and MW-46. 2. Following well development, these two cluster wells, along with all other final FA-2 limit wells, are to be sampled quarterly until intrawell water quality protection standard CLs have been proposed for each sampling interval.
ALRRF/ Geosyntec	Report January 27, 2021	<p>Provides a report documenting the installation of four new wells (MW-45A, MW-45B, MW-46A, and MW-46B) in accordance with the November 11, 2020 Fill Area. An additional well will be installed and screened from 40 to 50 feet bgs in the MW-45 well cluster during the next monitoring well installation field event conducted at the site in 2021.</p>
ALRRF/ Geosyntec	Work Plan February 9, 2021	<p>Monitoring Well MW-12 and ARC-2 Destruction Work Plan. Existing monitoring wells ARC-2 and MW-12 will be destroyed as part of the FA2 Phase 4 construction activities in April or May 2021. A report will be submitted to the CVRWQCB within 30 days of completing the field activities.</p>

MEMO

From	Format Date	Key Point(s)
ALRRF/ Geosyntec	Work Plan February 17, 2021	As part of the FA2 Phase 4 construction activities, existing FA2 Phase 3 groundwater monitoring wells MW-13A, MW-13B, MW-24, MW-25, MW26, and gas probe VP-4 will be destroyed in the beginning of May 2021, after the 2 nd Quarter 2021 semi-annual sampling event has been completed. In addition, new interim monitoring wells MW-30, MW-32, MW-33 and MW-36 and gas probe VP-4 will be installed for Phase 4 monitoring before the end of October 2021 and semi-annual sampling will be completed in the 3 rd Quarter 2021.
CVRWQCB	Letter April 7, 2021	Confirmation from the CVRWQCB that the tasks outlined in the <i>Monitoring Well MW-12 and ARC-2 Destruction Work Plan</i> are acceptable with the following exceptions and/modifications: <ol style="list-style-type: none"> 1. Alameda County maintains jurisdictional authority for well destruction; therefore, WMAC must comply with all applicable Alameda County directives. 2. WMAC shall submit a report by July 2, 2021 documenting the destruction of wells MW-12 and ARC-2.
ALRRF/ Geosyntec	Work Plan April 13, 2021	Monitoring Well E-05 Destruction and Replacement Work Plan describes the procedures that will be used to destroy and replace monitoring well E-05 in FA1. E-05R will be installed within 5 feet of the original well location per the requirement from the CVRWQCB and with the same construction details as E-05.

MEMO

From	Format Date	Key Point(s)
CVRWQCB	Letter April 29, 2021	<p>Confirmation from the CVRWQCB that the tasks outlined in the <i>Fill Area 2 Phase 4 Monitoring Well Installation and Destruction Work Plan</i> are acceptable with the following exceptions and/modifications:</p> <ol style="list-style-type: none"> 1. Alameda County maintains jurisdictional authority for well destruction; therefore, WMAC must comply with all applicable Alameda County directives. 2. Please notify CVRWQCB staff once proposed well destruction, installation, and sampling activities regarding the subject wells are scheduled, and of any changes to that scheduled. 3. If gas probe well VP-4 cannot be installed due to shallow groundwater conditions, the Discharger shall propose an alternative means by which to maintain vadose zone monitoring of the unsaturated zone in accordance with the MRP directly downgradient of FA2 Phase 4. 4. As outlined in the Work Plan, reports documenting well destruction and installation shall be submitted within 30 days of work completion.
ALRRF/ Geosyntec	Report May 3, 2021	<p>The <i>Monitoring Well MW-12 and ARC-2 Destruction Report</i> confirms that monitoring wells MW-12 and ARC-2 were destroyed in accordance with the 9 February 2021 <i>Monitoring Well MW-12 and ARC-2 Destruction Work Plan</i> approved by CVRWQCB on April 7, 2021 to accommodate construction of FA2 Phase 4.</p>
ALRRF/ Geosyntec	Work Plan May 10, 2021	<p>The <i>Fill Area 1 Soil Gas Probe and Monitoring Well Installation Work Plan</i> includes a description of the installation of groundwater monitoring wells at 4 locations and multi-depth soil gas probes at 7 locations around FA1. These additional locations are required under the Cease and Desist Order (CDO) R5-2021-0020 adopted on 22 April 2021. The FA1 monitoring wells and gas probes are planned to be installed beginning the week of 31 May 2021. A FA1 monitoring well and gas probe installation report will be submitted to the RWQCB within 60 days of completing the planned field activities.</p>

MEMO

From	Format Date	Key Point(s)
CVRWQCB	Letter May 19, 2021	Confirmation from the CVRWQCB that the tasks outlined in the <i>Fill Area 1 Soil Gas Probe and Monitoring Well Installation Work Plan</i> are acceptable with the following exceptions and/modifications: <ol style="list-style-type: none"> 1. A report documenting the installation of the proposed groundwater monitoring wells and gas probes shall be submitted within 30 days of work completion. 2. Once the groundwater monitoring wells and gas probes have been installed, they shall be incorporated into the facility's Monitoring Program, and monitored and sampled in accordance with Monitoring and Reporting Program R5-2016-0042-01.

Exceedances in Monitoring Wells

[Topics](#)

From	Format Date	Key Point(s)
ALRRF/SCS	Report Aug 2018	Naphthalene first found in well PC-1B, May 2018.
ALRRF/SCS	Letter Report Jan 3, 2019	Well PC-1B was overhauled and resampled, Nov and Dec 2018. Naphthalene continued to be detected but in diminishing trace concentrations. Source of the naphthalene is uncertain; could be the pump inside the well. Continued sampling and monitoring for naphthalene proposed, semiannually.
CVRWQCB	Letter Jan 11, 2019	Responded to ALRRF Oct 12, 2018 letter; concurred with proposed actions and required quarterly sampling.
ALRRF/SCS	Letter Report Nov 12, 2019	Follows up on initial report (August 2019) of exceedances in wells MW-2A (nitrogen), PC-1B (calcium), MW-8A (COD and tetrahydrofuran), and MW-8B (COD, tetrahydrofuran and other VOCs). The wells were resampled. Exceedances were confirmed for PC-1B (calcium), MW-8A (COD and tetrahydrofuran), and MW-8B (COD only). Asserts that the exceedances are unrelated to FA2 activities due to distance from the Phase 1 fill area. Proposes further study and an Optional Demonstration Report due in early January.

MEMO

From	Format Date	Key Point(s)
ALRRF/SCS	Letter & Report Jan 9, 2020	<p>Optional Demonstration Report. Verified statistical exceedances. Exceedances do not appear to be due to landfill leachate or LFG migration.</p> <p>The presence of the unlined storm water basin SB-H adjacent to wells MW-8A and MW-8B, soil disturbance during construction, and increased infiltration of storm water through the underlying soil and into groundwater, may be the causes of the increases in COD concentrations that triggered the statistical exceedances. Pipe-joining materials used for pipe installation during construction of the storm water basin appears to be the source of the THF detections in these wells.</p> <p>The report recommends continued semiannual groundwater monitoring and tracking the resulting data.</p>
CVRWQCB	Letter Jan 24, 2020	<p>Agrees with optional demonstration and requires:</p> <ol style="list-style-type: none">1. Quarterly sampling of PC-2A, PC-2C, P-2, and ARC-2 (surrounding wells) for a minimum two-years.2. Comparison of exceedance wells to surrounding wells.3. Reporting 30 days after sampling events

MEMO

From	Format Date	Key Point(s)
ALRRF	Letter May 21, 2020	<p>Verification resampling results for groundwater monitoring wells MW-8B, MW-10, PC-1B, and PC-2A in Fill Area 2 that had initial exceedances of concentration limits during the second semiannual 2019 monitoring event. Resampling results confirmed the initial statistical exceedances for chloride in MW-10 and bicarbonate alkalinity in PC-1B were not confirmed; however, the statistical exceedances for chloride in MW-8B and dissolved calcium, chloride, and TDS in PC-2A were confirmed. Fill Area 2 wells with the confirmed statistical exceedances (MW-8B and PC-2A) are not located in close proximity or directly downgradient to the current active Phases 1 or 2 fill areas. Therefore based on the earlier Optional Demonstration Report (ODR) and this supplementary information, WMAC considered the changes in water chemistry to be unrelated to Fill Area 2 landfill activities and most likely due to the presence of the unlined storm water Basin H adjacent to the well, soil disturbance during construction of the basin, and/or increased infiltration of storm water. PC-2A is also located adjacent to storm water basin H and is thus likely to be affected by the same processes. WMAC proposed that MW-8A and MW-8B were added to the list of wells sampled on a quarterly basis and that the forthcoming summary document for the study area include a review of the parameter changes noted during the second semiannual 2019 period.</p>

MEMO

From	Format Date	Key Point(s)
CVRWQCB	Letter Jun 1, 2020	<p>Response to statistical exceedance of inorganic constituent concentrations in well PC-1C in FA2. Once the Discharger’s PC-1C investigation was expanded to include other up-gradient wells, a clear pattern of increasing inorganic concentrations in groundwater west of PC-1C was also observed in E-20B and MW-12. The E-20B release from FA1 impacted groundwater in FA2 and by 31 August 2020, WMAC must submit:</p> <ol style="list-style-type: none"> 1. A revised site conceptual model to address the impact of the E-20B release and the LFG releases recorded at MW-4, GP-8, and GP-9. 2. An updated EFS to make appropriate changes to the E-20B correction action program. 3. A proposal to expedite the establishment of background groundwater concentration limits across FA2 before E-20B release impacts other FA2 wells. An AROWD to make appropriate changes to the E-20B release correction action program 90 days after submitting the EFS as required above.
ALRRF/SCS	Letter & Report August 25, 2020	<p>Groundwater monitoring conducted in FA-2 wells MW-8A, MW-8B, MW-13B, PC-1B, PC-1C, PC-2A, PC-2C, and P-2. MW-8B showed an initial statistical exceedance for dissolved calcium and total dissolved solids. Other than MW-8B, no new initial concentration limit exceedances were identified for inorganic monitoring. Recurring statistical exceedances for MW-8B (chloride), PC-1B (dissolved calcium), PC-1C (dissolved calcium, chloride, sulfate, and total dissolved solids) and PC-2A (dissolved calcium, chloride, and total dissolved solids) were observed. Previous concentrations of THF and naphthalene were not detected in the samples, and other than a single below RL concentration of toluene, no VOCs were detected in the samples. PC-2A, PC-2C, P-2 and ARC-2 are to be sampled quarterly.</p>

MEMO

From	Format Date	Key Point(s)
ALRRF/ Geosyntec	Report Aug 31, 2020	<p>Report titled <i>Response to RWQCB Letter dated 1 June 2020 Concerning PC-1C</i> prepared by Geosyntec Consultants that was submitted to the RWQCB on August 31, 2020. Geosyntec’s evaluation of the data indicated that the changes in inorganic groundwater quality observed in this area are most likely related to stormwater from Fill Area 1 and are not associated with the E-20B corrective action area landfill gas release. Geosyntec concluded that the observed changes in water quality were not associated with landfill gas impacts at E-20B because:</p> <ul style="list-style-type: none">• Similar and near simultaneous inorganic water quality changes were observed in samples from wells E-20B, MW-12, and PC-1C, all located in different areas.• Occurrence of these changes was observed following a period of increased precipitation inferred to lead to increased infiltration from the surface.• The distance from E-20B to PC-1C is large enough that change in inorganic water chemistry due to subsurface migration of impacts noted near E-20B would not have occurred at the essentially same time at PC-1C.• Potential non-landfill gas source due to the placement of plant debris on slopes to prevent erosion in connection with winterization of the landfill.

MEMO

From	Format Date	Key Point(s)
ALRRF	Letter Oct 16, 2020	<p>Letter states that during the first semiannual 2020 monitoring event, naphthalene in MW-2B and bis(2-ethylhexyl) phthalate in E-05 were observed above the reporting limit. Naphthalene was detected in the May 2020 MW-2B sample at 1.1 µg/L, slightly above the reporting limit (1.0 µg/L). Re-sampling occurred on August 12, 2020 where naphthalene was not observed and September 3, 2020 where naphthalene was detected below the RL. Therefore, the initial naphthalene detection from May 2020 was not confirmed. Bis(2-ethylhexyl) phthalate was detected at 26 µg/L, above the RL of 10 µg/L in May 2020 at E-05. After re-sampling once in August and twice September 2020, it was reported at 22 µg/L, 16 µg/L and 13 µg/L respectively; resampling confirms the initial detection in May 2020 but showed decreasing concentration over time. This confirmed detection in E-05 does not appear to be due to the influence of either LFG or leachate from ALRRF as bis(2-ethylhexyl) phthalate is not generally found in LFG and historical concentration in leachate samples since 2005 have not been elevated. WM proposed to conduct a study to determine the nature of bis(2-ethylhexyl) phthalate detection in an ODR which will be submitted within 90 days from October 9, 2020.</p>
ALRRF/SCS Engineers	Report January 8, 2021	<p>Groundwater monitoring conducted at corrective action monitoring well E-05 concluded that it is unlikely that the source of bis(2-ethylhexyl) phthalate detected is associated with leachate, LFG, or laboratory contamination. Although the source cannot be determined, the monitoring well casing integrity and dedicated pumping system need to be considered as it is one of the oldest well on site (installed 1985) and has a 33 year old dedicated QED bladder pump installed in 1987. Based on a discussion with WMAC, SCS Engineers proposes the monitoring well E-05 be replaced and that further evaluation of groundwater quality be based on data from the replacement well. A workplan will be prepared and submitted with 90 days of CVRWQCB concurrence.</p>

MEMO

From	Format Date	Key Point(s)
ALRRF/SCS Engineers	Letter March 11, 2021	<p>SCS submitted this letter to summarize the Status of Sampling and Reporting for Monitoring Wells MW-8A, MW-8B, MW-13A, MW13B, PC-1A, PC-1B, PC-1C, PC-2A, PC-2C, P-2, and ARC-2. The letter mentions the findings previously presented by WMAC and its consultants on August 25, 2020 and August 31, 2020.</p> <p>In the letter, SCS stated continued evaluation of water quality data presented under a separate cover does not appear to be warranted.</p>
SCS	Report March 22, 2021	<p>Initial indication of measurably significant results during the Second Semiannual 2020 Monitoring event were resampled during February.</p> <p>Initial statistical exceedances of inorganic compounds and detections of VOCS from wells MW-4A, MW-5A, MW-10, MW-13B, MW16, MW-18, MW-24 and MW-26 were not confirmed. No further action is required at this time.</p> <p>Initial statistical exceedances for chloride in MW-8A and dissolved calcium, chloride, and total dissolved solids in WM-2 were confirmed. Wells MW-8A and WM-2 are not located in close proximity or directly downgradient to the current Fill Area 2 Phases 1-2B fill areas. Hence, the observed change in inorganic parameter concentrations is not considered related to Fill Area 2 landfilling activities. In addition, MW-8A water quality changes were found to be caused by stormwater effects and not a release from the landfill.</p> <p>SCS and WMAC propose to conduct a study to determine the nature of the initial resample detections and prepare an Optional Demonstration Report within 90 days from March 11, 2021 for well WM-2.</p>

MEMO

Corrective Action

[Topics](#)

From	Format Date	Key Point(s)
ALRRF/ Geosyntec	Report May 21, 2021	<p><i>Fill Area 1 Corrective Action Program Landfill Gas Extraction Wells Report</i> outlines the LFG extraction wells WMAC is operating as part of the CAP to address LFG effects that have been observed in groundwater monitoring wells E-20B and MW-4A and in gas probe GP-9. This Report was prepared as required under RWQCB's CDO R5-2021-0020 adopted on 22 April 2021. The report concludes that:</p> <ol style="list-style-type: none"> 1. Wells are extracting gas from the CAP areas, 2. The Second Semiannual 2020 Groundwater Monitoring Report states that the CAP LFG extraction has been effective in reducing LFG impacts to groundwater, 3. No VOCs have been detected in MW-04A over the past four semi-annual monitoring events. 4. VOC concentrations at E-20B continue to generally decrease over time. and 5. Recent gas monitoring reports for GP-9 report compliance with regulatory standards. <p>WMAC will continue to evaluate the effectiveness of the CAP LFG extraction program in accordance with the provisions contained in the CDO.</p>

OTHER TOPICS

CVRWQCB Orders

[Topics](#)

From	Format Date	Key Point(s)
CVRWQCB	Cease and Desist Order April 22, 2021	<p>The Central Valley Regional Water Quality Control Board (CVRWQCB) issued Cease and Desist Order (CDO) R5-2021-001 for the ALRRF on April 22, 2021. In the CDO, the CVRWQCB alleges the ALRRF is being operated outside of applicable federal and state regulations, and the Waste Discharge Requirements (WDRs). A detailed description of the CDO was provided in Agenda Item 6.2 of the July 14, 2021 CMC Meeting Packet.</p>

MEMO

CVRWQCB Inspections

[Topics](#)

From	Format Date	Key Point(s)
CVRWQCB	Inspection Report April 6, 2021	<p>On March 17, 2021, the CVRWQCB staff conducted a final CQA inspection of Phase 3 of the FA2 Waste Management Unit (WMU). While onsite, they also inspected select wet weather related areas of concern. The inspection report mentions three areas of concern:</p> <ol style="list-style-type: none"> 1. Erosion and deposition of soil along the eastern side of soil Stockpile #7. 2. The presence of cattails growing in LSI-3, and 3. The need to remove and properly dispose of the sand used to clean up the leachate spill that occurred in the FA1, Unit 1 LCRS pump house containment unit. <p>The CVRWQCB requested a brief report documenting the noted FA1, Unit 1 LCRS pump house spill and its subsequent cleanup, including the removal and proper disposal of the sand by June 1, 2021. Items 2 and 3 should be addressed in the 2021 Annual Facility Inspection Reporting due by November 15, 2021.</p>

CASP Operations – For Information Only

[Topics](#)

From	Format Date	Key Point(s)
CVRWQCB	Letter April 7, 2021	<p>Following the March 17, 2021 CASP inspection, this letter gives notice of 1 Area of Concern noted as a pile of compost sludge/debris located just past the leachate outfall from the CASP Pad into the surface impoundment. The pile of sludge/debris, if allowed to grow, could impact the free flow of compost leachate into the surface impoundment. The CVRWQCB requested a brief report documenting the removal of the sludge/debris from the compost leachate surface impoundment be submitted by June 1, 2021.</p>

501 14th Street, 3rd Floor Oakland, CA 94612 T: 510.874.7000 F: 510.874.7001

To: ALRRF Community Monitor Committee

From: Langan, Community Monitor

Date: July 6, 2021

Re: **CMC Meeting of 7/14/21 – Agenda Item 6.4 – Reports From Community Monitor**

CLASS 2 SOIL FILE REVIEWS

In accordance with the Settlement Agreement, we reviewed Class 2 Soil Profiles at the WMAC offices. The records reviewed correspond to soil accepted at the landfill between January 1, 2020 and June 30, 2020 that were not reviewed previously. A total of 88 soil profiles were reviewed on May 3, 2021 and May 4, 2021. Additional soil records were reviewed that correspond to soil accepted at the landfill between August 1, 2020 and April 30, 2021. A total of 120 soil profiles were reviewed on May 4, 2021 and May 10, 2021. No out of compliance profiles were found. The Community Monitor team is following up with WMAC to obtain additional information on 23 profiles, which did not include a complete suite of analyses.

ALTAMONT MONTHLY OPERATIONS AND RECORDS REVIEW

Community Monitor site visits had been suspended by ALRRF during the Shelter-in-Place period declared due to the COVID-19 pandemic. During the second Quarter of 2021, the situation in California improved, and two site visits were performed by the Community Monitor.

In lieu of site visit reports, summaries of LEA inspections available on CalRecycle's website are provided for the month when site visits were not conducted. The reports in this item include:

- LEA Inspection for March, which took place on March 29, 2021.
- Community Monitor Site Visit for April, which took place on April 15, 2021.
- Community Monitor Site Visit for June, which took place on June 2, 2021.

Details about operations-related matters are provided in the attached reports. Issues that cause special concern are marked with yellow rectangles in the monthly reports. For the second quarter, construction of additional landfill space in Fill Area 2, Phase 4 was ongoing. Windblown litter issues continued. Fill Area 2 Phase 3 began operations at the end of April, Phase 2/2B had been the active disposal area until April, and Phase 3 is currently the active disposal area.

Also attached are graphs showing monthly tonnages by type of material for the most recent 12-month period. Figure 6.4-1 shows the breakdown of materials that make up Revenue-Generating Cover. Figure 6.4-2 shows these same quantities, plus the Municipal Solid Waste (MSW) and Special Waste tonnage for each month.

ALRRF Community Monitor Monthly Report

March 2021

Monthly Tonnage Report for March 2021, received April 13, 2021

Tonnage Summary:

		<u>tons</u>
Disposed, By Source Location		
1.1	Tons Disposed from Within Alameda County	89,300.43
1.2	Other Out of County Disposal Tons	4,395.34
	subtotal Disposed	<u>93,695.77</u>

Disposed, By Source Type

2.1	C&D	3,471.38
2.2	MSW	87,432.15
2.3	Special Wastes	2,791.42
	subtotal Disposed	<u>93,694.95</u>

Difference is one ticket (0.82 tons) voided in April -0.82 0.00%

Other Major Categories

2.4	Re-Directed Wastes (Shipped Off Site or Beneficially Used)	2.82
2.5	Revenue Generating Cover	48,182.12
	Total, 2.1 - 2.5	<u>141,879.89</u>

Materials of Interest

2.1.1	Fire Debris	3,249.02
2.3.1	Friable Asbestos	329.27
2.3.2	Treated Wood	134.58
2.5.1	Class 2 Cover Soils	20,324.21
2.5.2	Auto Shredder Fluff	12,055.55
2.5.3	Processed Green Waste/MRF fines, Beneficial Use (GSET)	0.00
2.5.4	MRF Fines for ADC	785.39

ALRRF Reports from Community Monitor

March 2021

Review of LEA Site Inspection on March 29, 2021

For the month of March, ALRRF did not allow site visits from the Community Monitor because of the COVID-19 emergency and Shelter-in-Place order. The LEA conducted the inspection in a modified manner including observing social distancing, taking separate vehicles, and reviewing records offsite.

The general conditions noted in the report and pictures appear to be good and similar to previous inspections.

The v-ditches along main paved roads were maintained clear and with green Filtrexx socks and straw wattles. No issues were observed. Landfill slopes were in good condition and did not exhibit signs of erosion, these slopes had presented signs of erosion in the past. In general, the inspection reports no standing water and proper materials for best management practices (BMPs) used in stormwater control.

The tire recycling facility was maintained in good condition. All tires that were not being currently processed appeared to be within trailers. At the time of the inspection, the gas plant was in operation with no reported issues.

The Trilo vacuum truck (used to collect windblown litter) was being serviced. Reportedly, the week before the inspection strong winds blew in the area, which scattered litter around the site. No windblown debris was observed escaping the facility.

Fill Area 1 (FA1) was observed from the Bird Perch. Minor erosion was reported along the inner edge of the dirt road, but was generally in good driving condition. No birds were observed flying above FA1. The inspector observed some windblown on the slopes and the access road to the north of the Bird Perch, and requested the areas were maintained free of windblown debris. LSI 1 and LSI 2 were in good condition. LSI 1 was filled with FA1 leachate and rain water. LSI 2 was filled with rain water.

The Active Face at Fill Area 2 (FA2) was viewed from the east bench road overlooking the Active Face to the west. The paved road to Fill Area 2 was in good condition. The Active Face was located at the Winter Pad and at the FA2, Phase 2 northeastern/eastern slope. No issues were observed. Stockpiles of Alternative Daily Cover (ADC) were observed at the toe of the Active Face slope. At the time of the inspection, access road and construction work was occurring in FA2 Phase 3.

The LEA inspected the Asbestos Containing Waste (ACW) Disposal Site, which is inspected on a quarterly basis. Highly visible warning signage at the entrance to the ACW area was observed. There were no birds observed within the ACW area. No windblown litter appear to have been escaping the area. There were approximately four stockpiles of cover soil, a single pile of sealed ACW bags, and no indication of escaping asbestos containing materials.

No violations or areas of concern were reported in the March inspection report.

Special Occurrences

One special occurrence was reported in March. The log reports training to all required personnel on Treated Waste Wood (TWW) acceptance, as the DTSC granted a variance to accept TWW at ALRRF, in accordance with a set of alternative management standards.

ALRRF Community Monitor Monthly Report

Monthly Tonnage Report for April 2021, received May 13, 2021

Tonnage Summary:

		<u>tons</u>
Disposed, By Source Location		
1.1	Tons Disposed from Within Alameda County	83,406.88
1.2	Other Out of County Disposal Tons	1,858.71
	subtotal Disposed	<u>85,265.59</u>

Disposed, By Source Type

2.1	C&D	1,444.01
2.2	MSW	82,115.81
2.3	Special Wastes	1,705.77
	subtotal Disposed	<u>85,265.59</u>
		0.00 0.00%

Other Major Categories

2.4	Re-Directed Wastes (Shipped Off Site or Beneficially Used)	1.96
2.5	Revenue Generating Cover	39,514.27
	Total, 2.1 - 2.5	<u>124,781.82</u>

Materials of Interest

2.1.1	Fire Debris	1,144.40
2.3.1	Friable Asbestos	237.21
2.3.2	Treated Wood	108.76
2.5.1	Class 2 Cover Soils	21,232.11
2.5.2	Auto Shredder Fluff	6,837.12
2.5.3	Processed Green Waste/MRF fines, Beneficial Use (GSET)	0.00
2.5.4	MRF Fines for ADC	685.76

ALRRF Reports from Community Monitor

April 2021

Site Visit April 15, 2021, 12:00 PM - 2:30 PM

- Attended by Maria Lorca (Langan, Community Monitor) and Liz Hill (ESA, Community Monitor).
- Escort: Luis Rocha and Michael Ganter (Waste Management). Announced.
- Weather: Sunny, warm, light winds.

General Observations

- A modified site visit protocol was followed to maintain social distance between Waste Management staff and the Community Monitor.
- Traffic to the site was flowing freely through the road and the entrance of the landfill.
- The scale houses appeared to be operational and in good condition.

Fill Area 1

- Fill Area 1 (FA1) was observed from the Bird Perch. The slopes and road were observed in good condition. Minor erosion was observed on the western slope of FA1, from the top of FA1. ALRRF staff reported the area would be regraded during the dry season.
- The two solidification basins were observed, no trucks were dumping sludges at the time of the observation.

Evapotranspirative (ET) Cover

- Overall the ET cover appeared to be in good condition. Portions of the ET cover, in the southern portion of the site, had low vegetation.
- Small cracks (less than 1/8-inch) were observed on the surface of the cover.
- More details on the vegetation observed are provided in the attached ESA site visit report.



Fill Area 2 Operations

- Windblown litter was present near Fill Area 2 (FA2) from the observation area.
- Hundreds of birds were observed in the vicinity of FA2. During the observation period, bird screamers were shot.
- Construction for FA2 Phase 3 was ongoing.



Mitigation Pond

- The pond was dry at the time of the time visit. The pond is maintained with a fence to prevent cattle to access. The vegetation on the pond covered the surface, and PVC pipes could be observed. ALRRF staff reported that the pond is irrigated intermittently.
- Birds were observed in the mitigation pond. Details on the bird and vegetation species observed are provided in the attached ESA site visit report.

Special Occurrences

No special occurrences were reported in April.

Attachment

ESA Site Inspection Summary Memorandum

ALRRF Community Monitor Monthly Report

Monthly Tonnage Report for May 2021, received June 11, 2021

Tonnage Summary:

		<u>tons</u>
Disposed, By Source Location		
1.1	Tons Disposed from Within Alameda County	79,057.78
1.2	Other Out of County Disposal Tons	<u>3,938.26</u>
	subtotal Disposed	82,996.04

Disposed, By Source Type

2.1	C&D	2,379.72
2.2	MSW	77,426.74
2.3	Special Wastes	<u>3,189.58</u>
	subtotal Disposed	82,996.04
		0.00 0.00%

Other Major Categories

2.4	Re-Directed Wastes (Shipped Off Site or Beneficially Used)	2.18
2.5	Revenue Generating Cover	<u>47,282.02</u>
	Total, 2.1 - 2.5	130,280.24

Materials of Interest

2.1.1	Fire Debris	2,116.83
2.3.1	Friable Asbestos	213.70
2.3.2	Treated Wood	218.56
2.5.1	Class 2 Cover Soils	16,570.91
2.5.2	Auto Shredder Fluff	12,224.00
2.5.3	Processed Green Waste/MRF fines, Beneficial Use (GSET)	0.00
2.5.4	MRF Fines for ADC	723.36

ALRRF Reports from Community Monitor

June 2021

Site Visit June 2, 2021, 1:00 PM - 3:00 PM

- On May 20, 2021 the Community Monitor attempted an announced site visit. Due to a fire that was being controlled on the Composting Facility, the site visit could not be conducted.
- Attended by Maria Lorca and Nicole McCallum (Langan, Community Monitor).
- Escort: Luis Rocha and Michael Ganter (Waste Management). Announced.
- Weather: Sunny, warm, windy.

General Observations

- A modified site visit protocol was followed to maintain social distance between Waste Management staff and the Community Monitor.
- Traffic to the site was flowing freely through the road and the entrance of the landfill.
- The scale houses were in good condition and had a green light indicator. Two trucks were observed accessing the landfill.
- The area where white goods are stored was observed and appeared to be in good condition. White goods, that reportedly had hazardous waste removed, were stored in containers.

Fill Area 1

- Fill Area 1 (FA1) was observed from the Bird Perch. The slopes and road were observed in good condition and showed no signs of erosion.
- The two solidification basins were observed. One truck was pumping out sludges in a solidification basin. Waste Management staff noted that the solidification basins are to be relocated and lined.

Fill Area 2 Operations

- A large quantity of windblown litter was present near FA2 from the observation area. Waste Management staff reported an AOC had been issued by the LEA, and they are working to have more litter pickers working on the landfill.



- Few birds were observed in the vicinity of Fill Area 2 (FA2). During the observation period, the bird screamers and canyons were not active.
- Landfilling operations were occurring on FA2 Phase 3. This phase had been approved for operation on April 22, 2021 and began receiving waste on May 25, 2021.
- Stockpiles of cover soil and Alternative Daily Cover (ADC) were observed at the toe of the Active Face.
- Construction for FA2 Phase 4 was ongoing.

LSI ponds/basins

- The LSI ponds were in good condition.
- LSI-2 was observed at about a quarter of its capacity (underdrain and rainwater) and LSI-1 (leachate) was at about half of its capacity.
- LSI 3 held little liquids. No vegetation was observed on LSI 3 footprint.

Fill Area 1 Leachate Collection and Recovery System Pump House

- In early April, a leachate spill had occurred in the pump house. The small spill was contained with sand and cleaned. During the June site visit, the Pump House appeared to be in good condition, with no standing liquids.



Special Occurrences

Two Special Occurrences were reported in May:

- On May 19, 2021, at approximately 2 am, a fire started on the curing pad of the Compost pad. Due to strong winds, the fire spread to other pads. ALRRF staff contained the fire, and notified the LEA and Air Board.
- On May 25, 2021, the LEA conducted their monthly inspection. During the inspection, the LEA observed excessive amount of windblown litter through the site. The LEA issued a verbal Area of Concern, and requested improvements for the following month's inspection. The Special Occurrence log notes that ALRRF had experienced record setting winds for multiple weeks, and the LEA requested to review the wind logs. The LEA May inspection was not yet published at the time of preparation of this packet.

memorandum

date April 19, 2021

to Mukta Patil and Maria Lorca, Langan

cc

from Liz Hill, ESA

subject Summary of ESA Site Inspection on April 15, 2021

On April 15th, 2021, Luis Rocha and Michael Ganter of Waste Management accompanied Liz Hill of ESA and Maria Lorca of Langan on a site inspection of the Altamont Landfill from 12:00pm to 2:30pm.

The site inspection began with a visit to the “Bird Perch”, an elevated portion of the landfill with views of the compost area and Conservation Area to the north, and Fill Area 1 to the south. Fill Area 2 to the southeast, not as visible due to being beyond FA1 at a lower elevation.

WM explained the landfill received treated wood, typically not allowed, starting in March with other occurrences in April due to being issued a 6-month variance.

Wind fences observed throughout the site, varying in height (~10-25 ft?). Bull fences are mobile and moved based on direction of wind. Other fences are permanent.

ET Cover Test Area – arrived at 12:38pm

The upper flat area southern swale bed has moderate to high amounts of grasses within a few minor occurrences of forbs. Vegetation observed in Ditch 2 included mostly non-natives: Curly dock (*Rumex crispus*), dead Russian thistle (*Salsola* sp.), wild oat (*Avena sativa*), Italian rye grass (*Festuca perennis*), ripgut brome (*Bromus diandrus*), and soft chess (*Bromus hordeaceus*). Please refer to image **2515** displayed below and **Figure 1** for this location. Figure 1 displays the location of all images discussed below. Segments of the swale’s upper banks displayed the absence of vegetation. The southwestern corner (near the entrance gate; image **2510**) and the northwestern corner (image **2536**) of the ET Cover upper flat area is predominately bare. Another bare area was observed along the northern end of the lower bench of the ET Cover area (image **2547**) adjacent to Ditch 1.

Minimal vegetation, predominately black mustard (*Brassica nigra*), big heron bill (*Erodium botrys*), and sour clover (*Melilotus indica*), was observed directly north and parallel of the swale within an approximately eight-foot wide alignment that appeared to be historically used as an access road.

North of Ditch 2, vegetation cover was fairly consistent (image **2535**), although a few 20 square foot patches in the northwest corner of the site appeared to be less dense in cover. Near the northwestern border of the site, a

concentration of lupine (*Lupinus* sp.) plants, a native species, was observed (image 2552). This area is on a gradual slope adjacent to the ET Cover fence where it borders an active stockpiling operation from Fill Area 2. One observance of Coyote brush (*Baccharis pilularis*) and a few occurrences of California poppy (*Eschscholzia californica*) and purple owl's clover (*Castilleja exserta*), all native species, were observed throughout the ET Cover site.

Erosional rills were observed immediately north of the ET Cover boundary (image 2539)

Windblown litter was observed intermittently along the upper flat area and in the swales throughout the ET Cover area, and in particular Ditch 1 (image 2542).

Mitigation Pond – arrived at 1:56pm

Bird species observed in this area include: red-winged blackbird (*Agelaius phoeniceus*), white-crowned sparrow (*Zonotrichia leucophrys*), and gull (*Larus* sp.) species.

Within the fenced pond the ground appeared dry throughout. Approximate ~2-inch pvc pipes observed throughout pond (image 2572). According to WM, these PVC pipes were installed within the last 1-2 years. WM will look into irrigation schedule and get back to ESA and Langan with that information.

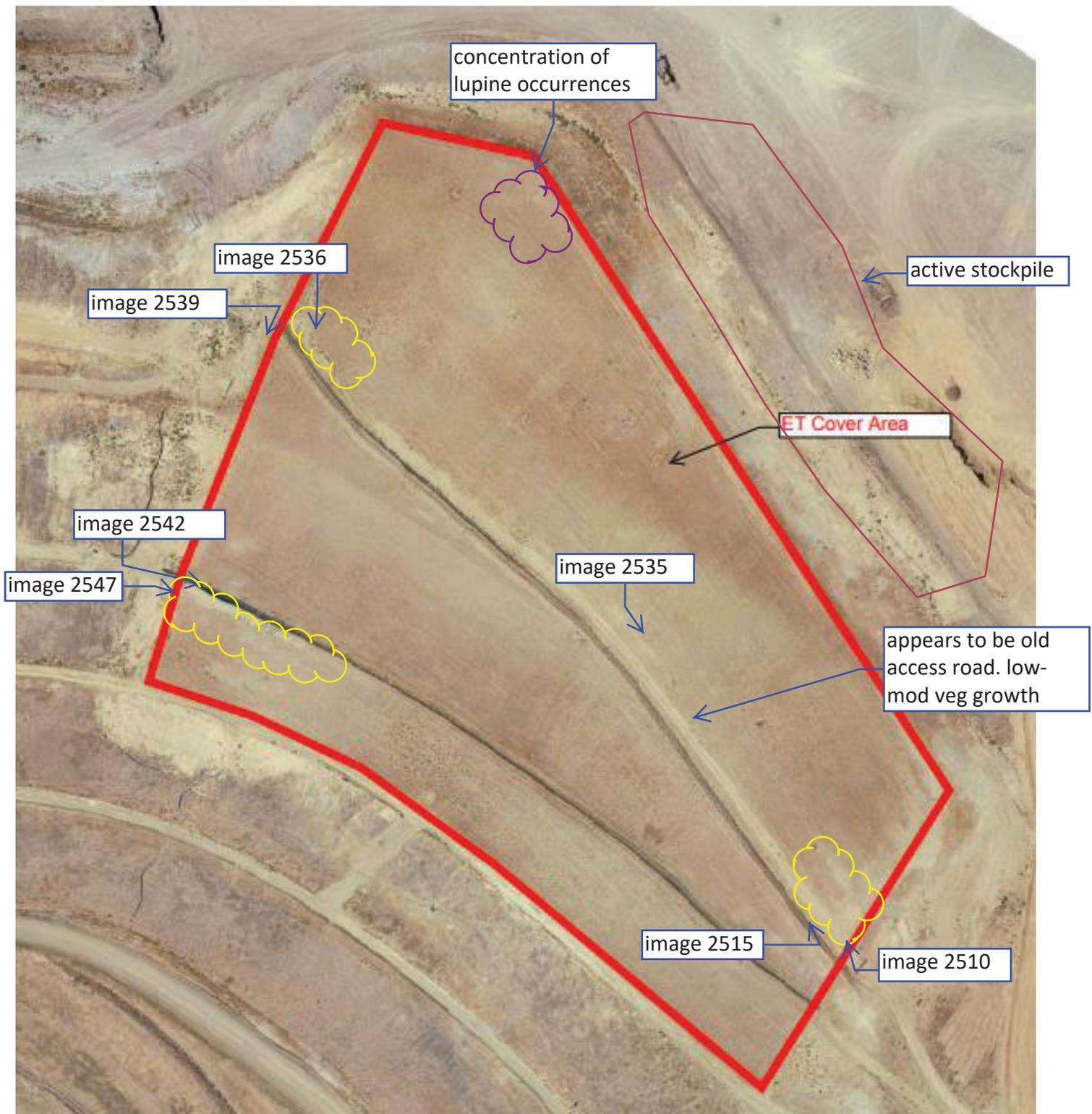
Large shrubs of quail bush (*Atriplex lentiformis*), a native species, and white horehound (*Marrubium vulgare*), a non-native invasive, were observed along the northern and western upland boundary of the fenced mitigation pond area. Perennial pepperweed (*Lepidium latifolium*) was observed in patches throughout the site. This species is also non-native and considered a target species by the Waters and Wetlands Mitigation Plan for Fill Area 2¹ Item 6.1.2 Pest Species Control as a species to be eradicated. Along the western boundary of site, near the rocked swale built to channel stormwater runoff to the pond, a white substance was observed on the pepperweed leaves (image 2580), which could be a type of fungus. The swale is heavily populated by Italian thistle (*Carduus pycnocephalus*). Two large groupings of cattails (*Typha* sp.) were observed in the lower elevations of the pond.

In the rocked swale along the western boundary of the pond, Italian thistle (*Carduus pycnocephalus*) was the predominant species.

¹ Padre Associates, Inc., 2005. Waters/Wetlands Mitigation Plan, Fill Area 2 Landfill Expansion Project. Altamont Landfill and Resource Recovery Facility. Alameda County, CA. Prepared for Waste Management of Alameda County, Inc. Altamont Landfill and Resource Recovery Facility. September 2005.

Figure 1. ET Cover April 2021 Site Visit

Image references are from 4/15/21 site visit. Areas outlined in yellow were observed to have bare ground.



Aerial photo of the cover taken in June 2019 (Miller Creek, 2019)

Image 2515



Image 2510



Image 2536



Image 2547



Image 2535



Image 2552



Image 2539



Image 2542



Image 2572



Image 2580



Figure 6.4-1 Monthly Volumes of Revenue-Generating Cover

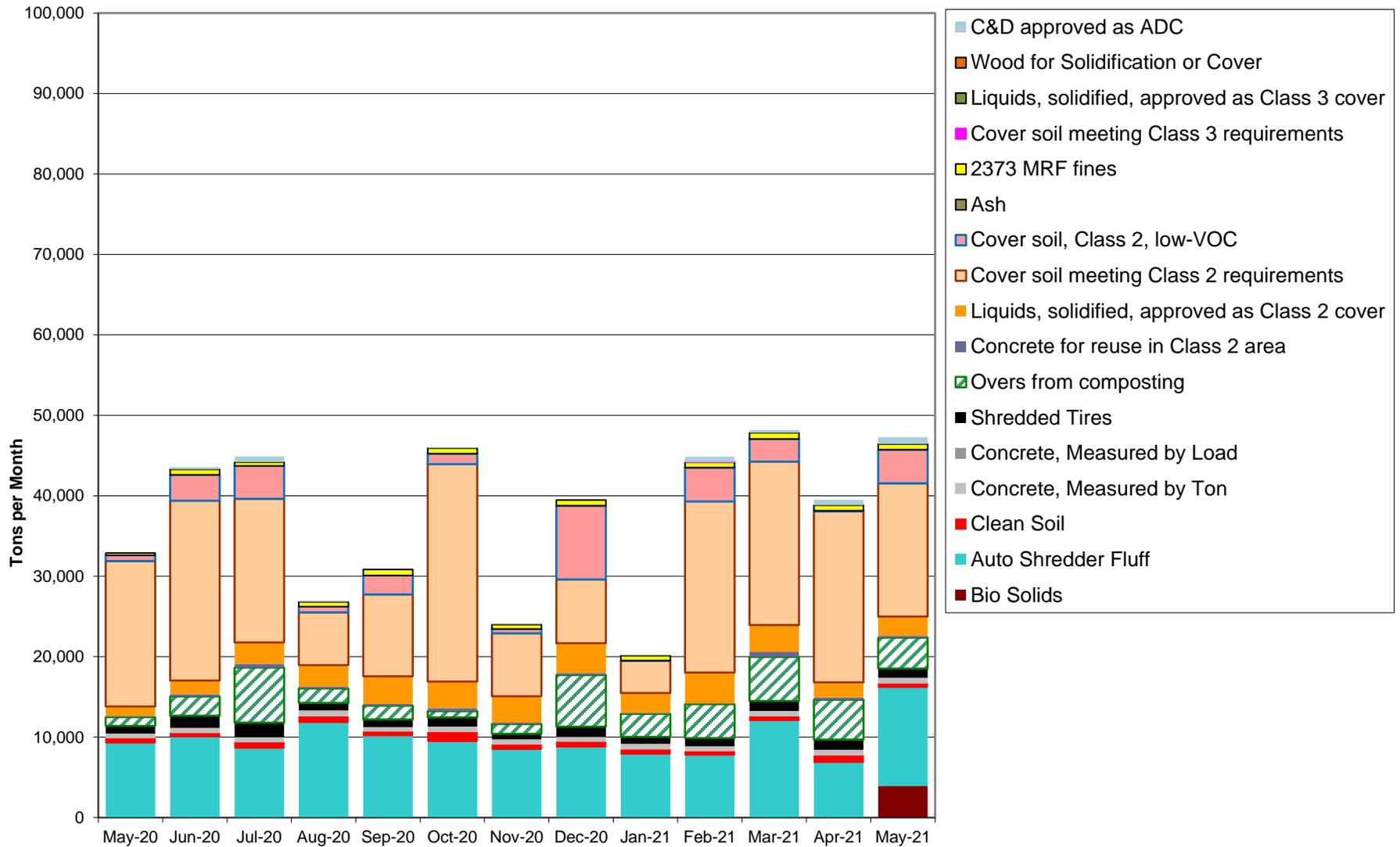


Figure 6.4-2 Monthly Volumes of Landfilled Materials

