COMMUNITY MONITOR COMMITTEE
Altamont Landfill Settlement Agreement

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

AGENDA

DATE: **Wednesday, January 14, 2026**
TIME: **4:00 p.m.**
PLACE: City of Livermore
Maintenance Services Center
3500 Robertson Park Road

1. Call to Order
2. Introductions
3. Roll Call
4. Approval of Minutes (From October 8, 2025)
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 Election of Chair for 2026**
   - **6.2 Responses to Committee Member Questions**
   - **6.3 Water Board Requests**
   - **6.4 Review of Documents on GeoTracker website**
   - **6.5 PFAS Updates**
   - **6.6 Reports from Community Monitor**
   - **6.7 Annual Report 2025**
   - **6.8 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 **April 8, 2026,** at 3500 Robertson Park Road, Livermore.

Informational Materials:

- Community Monitor Roles and Responsibilities
- List of Acronyms

www.altamontcmc.org

VOTING MEMBERS

Ben Barrientos
City of Livermore

Matthew Gaidos
City of Pleasanton

Donna Cabanne
Sierra Club

Emmanuel Nava
Northern California Recycling Association

NON-VOTING MEMBERS

Sonam Kaur
Blaine Harrison
Waste Management Altamont Landfill and Resource Recovery Facility

Ryan Hammon
David Madjeros
Aide Villegas
Alameda County

Robert Cooper
Altamont Landowners Against Rural Mismanagement (ALARM)

STAFF

Judy Erlandson
City of Livermore
Public Works Department

Anna Zamboanga
City of Livermore Recycling Specialist

City of Livermore

HOW TO PARTICIPATE IN A COMMUNITY MONITOR COMMITTEE MEETING:

You can participate in the meeting in a number of ways:

The **Community Monitor Committee Agenda and Agenda Reports** are prepared by the Community Monitor and City staff and are available for public review on Wednesday evening, seven days prior to the Community Monitor Committee meeting at the Maintenance Service Center, 3500 Robertson Park Road, Livermore. The agenda is also available at http://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 at the Maintenance Service Center, 3500 Robertson Park Road, Livermore, and included in the agenda packet available at http://altamontcmc.org/.

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@LIVERMORECA.GOV OR CALL (925) 960-4170 (VOICE) OR (925) 960-4104 (TDD) AT LEAST THREE (3) BUSINESS DAYS IN ADVANCE OF THE MEETING.

Submission of Comments Prior to the Meeting:

Email Comments may be submitted by the public to the City of Livermore Public Works Department via email at SolidWaste_Recycling@livermoreca.gov. Items received by 12:00 pm on the day of the meeting will be provided to the Committee and will be available on the meeting agenda prior to the meeting. These items will not be read into the record.

Submission of Comments During the Meeting:

During the meeting, the Open Forum agenda item is an opportunity for the public to speak regarding items not listed on the agenda. Speakers may also provide comments on any item listed on the agenda. Speakers are limited to a maximum of 500 words per person, per item. The Committee is prohibited by State law from taking action on any items that are not listed on the agenda. However, if your item requires action, the Committee may place it on a future agenda or direct staff to work with you and/or report to the Committee on the issue.

For questions regarding the Community Monitor Committee, please contact Public Works at (925) 960-8015.

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. Counting trucks arriving at the Altamont Landfill (section 5.7.8); and

G. Reviewing waste testing data and source information (section 5.7.9).

Waste Management of Alameda County's Responsibilities
Per the settlement agreement, Waste Management is responsible for:

A. Paying for the services of the Community Monitor, based on an annual cost estimate (section 5.3.3).

B. Paying an additional 20% over the annual cost estimate if warranted based on "credible evidence" (section 5.3.3).

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 September 24, 2025.

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
BAAD – Bay Area Air 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)
CVRWQCB – Central Valley Regional Water Quality Control Board
CMC – Community Monitor Committee
DTSC - Department of Toxic Substances Control
DWR – Department of Water Resources
EMP – Evaluation Monitoring Plan
EPA – United States Environmental Agency
LEA – Local Enforcement Agency (i.e., County Environmental Health)
RWQCB/Water Board – 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
TASW – Treated Auto Shredder Waste

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

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)
CH_4 – methane
CO_2 – 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.
AQI – Air Quality Index
BGS – below ground surface
BMP – Best Management Practice
CASP – Covered Aerated Static Pile (ASP) composting
CEQA – California Environmental Quality Act
CERCLA – Comprehensive Environmental Response, Compensation, and Liability 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

General Terms (continued)
GPS – Global Positioning System
IC engine – Internal combustion engine
LCRS – leachate collection and removal system
LEL – lower explosive limit
LSI – leachate system infrastructure
LMR – Landfill Methane Regulation
mg/L – milligrams per liter, or (approximately) parts per million
NAAQS – National Ambient Air Quality Standards
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.
RCRA – Resource Conservation and Recovery Act
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 October 8, 2025

DRAFT

1. Call to Order

The meeting came to order at 4:00 PM.

2. Roll Call

Members Present:	Donna Cabanne, Sierra Club; Matthew Gaidos, City of Pleasanton; Emmanuel Nava, Northern California Recycling Association (NCRA); Aliya Khan, Alameda County Department of Environmental Health (LEA); Blaine Harrison, Altamont Landfill and Resource Recovery Facility (ALRRF)
Absent:	Ben Barrientos, City of Livermore; Robert Cooper, Altamont Landowners Against Rural Mismanagement (ALARM)
Staff:	Judy Erlandson, Anna Zamboanga, City of Livermore; Grace Stafford and Megan Rollo, Langan/Community Monitor

3. Introductions

All those present introduced themselves.

4. Approval of Minutes of July 9, 2025 meeting

Mr. Gaidos moves to approve the Minutes of July 9, 2025, meeting. Ms. Cabanne seconds and members of the committee present approve the Minutes.

5. Open Forum

No comments.

6. Matters for Consideration

6.1 Responses to Committee Member Questions

Ms. Rollo presented the responses to the committee members' questions from the July 9, 2025, meeting. There were no comments or questions for this item.

Mr. Gaidos closed item 6.1.

6.2 Water Board Requests

Ms. Rollo presented the Water Board Request table. New items added to the table were discussed. There were no comments or questions on the item.

Mr. Gaidos closed item 6.2.

6.3 Review of Documents on Geotracker

Ms. Rollo presented the Review of Documents on Geotracker. Ms. Cabanne requests a follow-up at the January 14, 2026, meeting regarding ongoing conversations between Waste Management and the CVRWQCB about PG&E disposal at ALRRF.

Mr. Gaidos closed item 6.3.

6.4 Review of Reports from ALRRF

Ms. Rollo presented item 6.4.1, Review of Air Emissions Report. Ms. Cabanne asked if anything will be done in response to the methane exceedance at GP-20C and requested the CM to follow up on the response to the exceedance at the January 14, 2026, meeting. Ms. Rollo said she will follow up with the landfill. Mr. Gaidos asked how temperature exceedances at the gas wells are corrected. Ms. Kaur noted Waste Management has a response plan to temperature exceedances and Mr. Harrison noted that dirt or water is added to the surface feature of the well if it is too hot.

Ms. Stafford presented item 6.4.2, ALRRF Groundwater Report. Ms. Cabanne asked what the response to the 1,1-dichloroethane (1,1-DCA) detection in E-20B is, and to follow up in the January 14, 2026, meeting. Ms. Cabanne also requested the CM continue to track the MTBE breakdown products at the landfill and activities at the landfill, in the case that they are contributing to the presence of TBA. Mr. Gaidos asked how many sample events are required to establish or to be considered a trend in data. Ms. Stafford noted that three events are required to reliably establish a trend.

Mr. Gaidos closed item 6.4.

6.5 PFAS Update

Ms. Stafford presented item 6.5, PFAS Update. Mr. Nava asked how the change in PFAS regulations would affect monitoring at the landfill. Ms. Stafford noted that the landfill is not continuously monitored for PFAS as it was required only once. She noted that the CM is awaiting PFAS regulation applicable to the landfill, so the changes in PFAS regulations noted in this section would not have an effect on the landfill at this time.

There were no additional comments or questions.

Mr. Gaidos closed item 6.5.

6.6 Reports from the Community Monitor

Ms. Rollo presented item 6.6, Reports from the Community Monitor. There were no comments or questions for this item.

Mr. Gaidos closed item 6.6

6.7 Staff Report – CMC 2026 - 2028 Approval of Contract for Langan Services

Ms. Erlandson presented item 6.7, Staff Report, CMC 2026-2028 Approval of Contract for Langan Services. Mr. Gaidos called for a motion to approve, Ms. Cabanne seconds and the CMC voted to approve the contract. Ms. Erlandson noted the contract will be sent out to the CMC via email for signature.

Mr. Gaidos closed item 6.7.

6.8 Meeting Calendar for 2026

Ms. Erlandson presented item 6.8. Mr. Nava called for a motion to approve, Ms. Cabanne seconds and the CMC voted to approve the 2026 meeting calendar.

7. Agenda Building

Mr. Gaidos noted the CMC questions and follow-up items made during the meeting to be included in the next packet. Ms. Rollo noted that they will be included in item 6.2 for the January 14, 2026, packet.

Mr. Gaidos closed item 7.

8. Adjournment

The meeting was adjourned around 4:47 p.m. The next meeting will be held on Wednesday January 14, 2026, at 4:00 p.m. at the Livermore Maintenance Services Center at 3500 Robertson Park Road.

COMMUNITY MONITOR COMMITTEE
STAFF REPORT

TO: Community Monitor Committee Members

FROM: Judy Erlandson, Public Works Manager

SUBJECT: Community Monitor Committee Election of Chair

RECOMMENDED ACTION

Staff recommends the Community Monitor Committee elect a Committee Chairperson.

DISCUSSION

The Settlement Agreement, dated December 5, 1999, 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. (Settlement Agreement), describes the duties and obligations of the Community Monitor Committee, but does not require the selection of a Committee Chairperson.

Although not required by the Settlement Agreement, staff recommends the Community Monitor Committee select a Chairperson to preside at all regular meetings and decide upon all points of order and procedure during the meeting.

If the Committee chooses to appoint a Chairperson, election shall be by majority vote of the voting members of the Committee. If a quorum of three of the four voting Committee members is present, all three committee members would have to vote, and vote unanimously, in order to take this action.

Approved by:

Judy Erlandson
Public Works Manager

MEETING DATE:	AGENDA ITEM:
01-14-2026	6.1

LANGAN

Memorandum

135 Main Street San Francisco, CA 94105 T: 415.955.5200 F: 415.955-5201

To: ALRRF Community Monitor Committee

From: Langan – Community Monitor

Date: January 14, 2026

Re: **CMC Meeting of 1/14/2026 - Agenda Item 6.2 - Responses to Committee Members' Questions**

Questions from the October 8, 2025, meeting unless otherwise stated.

May 14, 2025, NOV regarding PG&E Disposal

Ms. Cabanne requested an update on the correspondence between Waste Management and the CVRWQCB regarding the PG&E disposal at ALRRF documented in the CVRWQCB NOV dated May 14, 2025. The most recent correspondence between the CVRWQCB and Waste Management occurred on July 25, 2025, in a letter from Waste Management wherein they discuss that the NOV and the subsequent CVRWQCB correspondence are "flawed in multiple respects in reaching the conclusion that ALRRF received hazardous waste…". There has been no response from the CVRWQCB since CM updates during the October 8, 2025, CMC meeting. The CM continues to track this NOV as new information emerges.

GP-20C Methane Exceedance

Ms. Cabanne requested an update on the response to the methane exceedance observed at GP-20C. The Second Quarter 2025 gas monitoring report indicated Gas Probe GP-20C had higher methane values (31.3% by volume in air, exceeding the regulatory threshold of 5%). Previous Air Emission reports note that "the methane values at gas probes GP-8C and GP-20C have been previously shown to be naturally occurring and not related to landfill operations." The report indicated other measurements did not exceed the regulatory threshold of 5% (perimeter) or 1.25% (in buildings).

1,1-DCA Detection in EB-20B

Ms. Cabanne requested an update on what the response was to the 1,1-DCA detection in monitoring well E-20B. There is no update on this item as of the January 14, 2026, meeting. However, more information will be provided in the CM review of SCS Engineers, First Quarter Semiannual Groundwater Monitoring Report in 2026.

LANGAN

135 Main Street San Francisco, CA 94105 T: 415.955.5200 F: 415.955.5201

Memorandum

To: Community Monitor Committee

From: Langan – Community Monitor

Date: January 14, 2026

Re: **CMC Meeting of 1/14/26 – Agenda Item 6.3 – Central Valley Regional Water Quality Control Board (CVRWQCB) Requests Progress Update**

The Central Valley Regional Water Quality Control Board (CVRWQCB) issued Cease and Desist Order[1] (CDO) R5-2021-001 for the ALRRF on April 22, 2021. In the CDO, the CVRWQCB alleged the ALRRF was being operated outside of applicable federal and state regulations, and the Waste Discharge Requirements (WDRs). The CDO provided a list of various items the Discharger (ALRRF) had performed out of compliance and 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.

Table 6.3.2 provides an update of the CVRWQCB requests, including the requirements outlined in the CDO, the expected completion timeline and progress that has been made on each item. Any Areas of Concern (AOCs) or Violations that were included in the previous packets that have been resolved are not included in the updated table.

The Community Monitor will continue to review items on GeoTracker and discuss with WMAC during site visits to provide updates on the work and deliverables requested by the CVRWQCB.

[1] According to California Water Code Section 8701.2 - Cease and desist order, if the Water Board or executive officer determines that any person or public agency has failed to adequately respond to a notice of violation, the board or executive officer may issue an order directing that the person or public agency to whom the notice of violation was issued to cease and desist. A cease and desist order is an order by an administrative agency that requires certain practices specified to stop.

Table 6.3-2
Tracking Table for Water Board Requests
Altamont Landfill Resource and Recovery
Livermore, CA

Task	Due Date	Completed	Comments
Cease and Desist Order (CDO) R5-2021-001			
1.Update the Sampling and Analysis Plan for the interim POC detection monitoring program	~~7/21/2021~~ 4/4/2022	Yes, revised plan submitted on 4/4/22	
2. Revise the background water quality values and update the concentration limits (CLs)	4/21/2022	Yes, submitted on 5/13/22	
3. Install groundwater monitoring wells (interim and final) for FA2			
(a) Work plan to install the groundwater monitoring wells (interim and final) for FA2	7/21/2021	Yes, submitted on 7/20/21	
(b) Install Interim POC Wells	Ongoing	Ongoing	
(c) Report installation within 60 days of installing any new groundwater monitoring well or soil gas monitoring well.	Ongoing	Ongoing	
(d) Install Final Permanent FA2 limit wells	2021 and 2022	Yes, installation report submitted on 12/2/2021	
(e) Report installation within 60 days of installing any new groundwater monitoring well or soil gas monitoring well.	Ongoing	Ongoing	Monitoring well installations have been reported within schedule.
(f) Implementation of a Water Quality Monitoring and Response Program for FA2 Unit 1		Yes, completed with the SAP revisions and new monitoring well network.	
4. Install soil gas monitoring wells (interim and final) for FA1 and FA2			
(a) Work plan to install the soil gas monitoring wells (interim and final) for FA1 and FA2	7/21/2021	Yes, submitted on 8/3/2021	
(b) Install Interim Monitoring Wells FA1	Week of May 31, 2021	Yes, submitted on 7/20/21	
(c) Install Interim Monitoring Wells FA2	9/21-10/21; 2021-2025	Ongoing	Same schedule as item 3(b).
(d) Report installation within 60 days of installing any new groundwater monitoring well or soil gas monitoring well.	Ongoing	Ongoing	Monitoring well installations have been reported within schedule.
(e) Install Final Monitoring Wells		Yes, installation report submitted on 12/2/2021	
5. Surface Water Monitoring Plan to conduct surface water monitoring for surface water flowing out of FA2	7/21/2021	Yes, submitted on 7/16/21	
(a) Surface Water Monitoring		Yes, Second Semiannual 2021 results submitted on 2/1/22	
6. 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	8/1/2021	Yes, second report submitted on 2/1/22	
7. Groundwater and soil gas monitoring network along the northern and eastern limits of FA1			
(a) Work plan to install the groundwater and soil gas monitoring network along the northern and eastern limits of FA1	6/21/2021	Yes, submitted 5/10/2021; approved 5/19/2021	
(b) Install groundwater and soil gas monitoring network along northern and eastern limits of FA1	Week of May 31, 2021	Yes, submitted on 8/3/2021	

Table 6.3-2
Tracking Table for Water Board Requests
Altamont Landfill Resource and Recovery
Livermore, CA

Task	Due Date	Completed	Comments
8. Update corrective action financial assurance cost estimates for FA1 and FA2	~~7/21/2021~~ 3/1/2022	Yes, submitted 2/25/2022	Revised cost estimates were approved by the CVRWQCB on 4/21/2022.
9. Report outlining the LFG extraction wells operations as part of the Corrective Action Program to address the LFG impacts outside the limits of FA1	5/22/2021	Yes, submitted 5/21/2021	
10. Submit a Report of Waste Discharge to install off-waste liquid solidification basins	10/19/2021	Yes, submitted 10/19/2021	
11. Report Installation and operation of new off-waste footprint solidification basins	After completion of installation	Ongoing	
12. Notify the CVRWQCB 30 days prior to removal of interim monitoring devices	Ongoing during Fill Area 2 expansion	Ongoing	
WDRs Order R5-2016-0042-01, Amending Order R5-2017-0026			
1. Prepare and submit a preliminary description of the Toe Berm, including the proposed "soil conditioning," for Staff review.	1/24/2025	Completed	
2. An updated description of subsequent proposed Phase construction schedule, if not otherwise noted in the JTD/ROWD	1/24/2025	Completed	
3. Submit a report of the results of review of circumstances regarding drums observed in exisiting solidification basins atop FA1, including respective contents.	1/9/2025	Completed	
4. Submit workplan for required decomissioning of the existing solidification basins atop FA1.	~~6/2/2025~~ 10/30/2025	Completed, pending submittal to Geotracker	CVRWQCB 2 September 2025 letter commented on the 19 June 2025 subject work plan.
5. As a part of FA2 Ph. 8 cell construction, CVRWQCB is requiring additional information - Submittal of a report regarding observed discharge of apparent cardboard boxes, wooden pallets, and other possible dunnage to the existing soldification basins atop FA1, including their respective contents.	12/15/2025	Completed, pending submittal to Geotracker	
Violations or Areas of Concern (AOCs)			
1. To address the violations issued by the CVRWQCB on June 10, 2024, the discharger shall:			
(a) Ensure leachate returned to FA1/Unit 2 for dust control is applied at the minimum amount necessary for dust control.	Immediately	Completed	
(b) Submit a proposal and timeline to install containment system for the leachate collected at Seep B and C collection point to prevent discharge and ponding of leachate atop FA1/Unit 1.	7/30/2024	Completed	
(c) Document the removal of ponded leachate and leachate stained/impacted daily or intermediate cover soil from atop FA1/Unit 1 and FA2/Unit 2, as well as soil replacement, with clean soil, and regrading to ensure adequate cover thickness and drainage.	7/30/2024	Completed	

Table 6.3-2
Tracking Table for Water Board Requests
Altamont Landfill Resource and Recovery
Livermore, CA

Task	Due Date	Completed	Comments
(e) Ensure daily cover is applied across all waste at least every 6.5 days	Continuous	Completed and ongoing	Active implementation - WM has implemented a more frequent application of daily cover and conducted a retraining session for onsite management focusing on application of intermediate cover.
2. Per the June 10, 2024 NOV, notify the CVRWQCB of progress made on the AOCs listed below:			
(a) AOC 1 - Repair broken LFG extraction line observed atop LF1/Unit 1 and provide documentation	As soon as repair is complete	Completed	LFG extraction line observed was an abandoned lateral line, and part of older decomissioned system. Line was cut, capped and covered.
(b) AOC 2 - All liquids, including tank washout, discharged into the Facility's solidification basins, must be discharged directly into the defined limits of each basin	Continuous	Completed and ongoing	ALRRF will ensure that all liquids, including tank wash out, discharged into the facilities solidification basins, are directed exclusively into the defined limits of each basin.
(c) AOC 3 - Enhance windblown litter controls and clean up. Reduce the size of the open disposal face and the application of daily cover over waste more frequently than every 6.5 days as a best management practice and improved housekeeping.	Continuous	Completed and ongoing	Active implementation - WM has implemented a more frequent application of daily cover and conducted a retraining session for onsite management focusing on application of intermediate cover.
(d) AOC 4 - Submit report documenting cleanup from leaking LSI-3 pump. Include proposal and timeline to install secondary containment for the LSI-3 leachate pump transfer line.	8/1/2024	Completed	
(e) AOC 5-12 - These AOCs may be considered as winterization work. Repair as practical.	10/31/2024, final report due 11/14/2024	Completed	
(f) AOC 13 - CVRWQCB has reached out to Storm Water Unit and requested they inspect and evaluate facility for compliance with the industrial general permit good housekeeping best management practice requirements.	Pending	Pending	CVRWQCB Storm Unit has inspected facility but no formal recognition of AOC 13 on Geotracker at this time.
3. To address the violations issued by the CVRWQCB on August 5, 2024, the discharger shall:			
(a) Isolate, remove, and properly contain the hazardous waste and arrange for its disposal at a permitted facility authorized to accept hazardous waste.	Immediately	Completed	
(b) Submit a report documenting the offsite disposal of the hazardous waste at a permitted facility authorized to accept hazardous waste.	10/1/2024	Completed	
Per the May 14, 2025, NOV, notify the CVRWQCB of progress made on the NOVs listed below:			

Table 6.3-2
Tracking Table for Water Board Requests
Altamont Landfill Resource and Recovery
Livermore, CA

Task	Due Date	Completed	Comments
(a) Isolate, remove, and properly contain the hazardous waste and arrange for its disposal at a permitted facility authorized to accept hazardous waste.	Immediately	In Progress	Waste Management and CVRWQCB are in correspondence regarding the matter.
(b) Submit a report documenting the offsite disposal of the hazardous waste at a permitted facility authorized to accept hazardous waste.	7/31/2025	In Progress	Waste Management and CVRWQCB are in correspondence regarding the matter.
Per the May 27, 2025, NOV, notify the CVRWQCB on the progress made on the NOVs listed below:			
(a) Implement procedures to prevent future discharges of waste outside the completed, lined extent of FA2.	Immediately	Completed and ongoing	
(b) Submit a report with photographic evidence demonstrating that all waste documented in the attached Inspection Report observed outside the completed, lined limits of FA2 has been removed and property disposed.	7/30/2025	Completed - pending submittal on Geotracker	
Additionally, included in the Inspection Report from May 27, 2025, the CVRWQCB is requiring resolutions to the following AOCs, listed below, with the submittal of a report with photographic evidence, documenting that each of the documented AOCs have been addressed:			
(1) Two leachate-stained soil seeps were observed along the southern face of LF-1/Unit-1 in the area of Seep C	8/30/2025	Completed	
(2) Leachate-stained soil and some liquid was visible beneath the Seep B and Seep C leachate collection tanks.	8/30/2025	Completed	
(3) CVRWQCB observed truck potentially emptying load in a location that would have been outside the discharge limits of the Yellow Flag Basin	8/30/2025	Completed	
(4) A low area of possible settlement was observed atop FA1, just east of the J-stand, which could lead to significant ponding.	8/30/2025	Completed	
(5) A single area of leachate-stained soil was observed atop FA1 just southwest of the J-stand.	8/30/2025	Completed	

Table 6.3-2
Tracking Table for Water Board Requests
Altamont Landfill Resource and Recovery
Livermore, CA

Task	Due Date	Completed	Comments
(6) A couple areas of notable erosion were observed atop FA1.	8/30/2025	Completed	
(7) Tire ruts and ponding were observed atop FA1 adjacent to the TASW stockpile.	8/30/2025	Completed	
(8) A few areas of exposed waste, without adequate daily/intermediate cover were observed atop FA1.	8/30/2025	Completed	
(9) Erosion or settlement occurred beneath the well apron for GP-24. Assess the condition of GP-24 and submit a report that contains a proposal to repair the well.	7/30/2025	Completed	
(10) Well MW-10 has been damaged and will need to be repaired and possibly replaced. Assess the condition of MW-10 and submit a report that contains a proposal to repair the well.	7/30/2025	Completed	
(11) A large stockpile of soil has been temporarily placed within SB-H.	9/1/2025	Completed	

Notes:

POC - Point of Compliance
FA - Fill Area
LFG - Landfill Gas
CVRWQCB - Central Valley Regional Water Quality Control Board
WMAC - Waste Management of Alameda County
TBD - To Be Determined. These deadlines depend on activities which have not yet been completed.
Gray shaded cells denote items that have been completed and no longer tracked. Items remain in the table for reference.

LANGAN

Memorandum

135 Main Street San Francisco, CA 94105 T: 415.925.5200 F: 415.955.5201

To: ALRRF Community Monitor Committee

From: Langan – Community Monitor

Date: January 14, 2026

Re: **CMC Meeting of 1/14/2026 – Agenda Item 6.4 – 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 July 2025 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 website and can be accessed using this link[1].

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, Landfill Operations.

For reference the Geotracker webpage for the ALRRF is accessible here: https://geotracker.waterboards.ca.gov/profile_report?global_id=L10005834311.

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

MEMO

Topic List

Landfill Operations

- Revised Configuration and Phasing Schedule for FA2

Monitoring Wells

- New or Pending Monitoring Wells
- Exceedance in Monitoring Wells

Other Topics

- CVRWQCB Inspections
- Winterization Plan

MEMO

LANDFILL OPERATIONS

Revised Configuration and Phasing Schedule for FA2 Topics

	From	Format | Date	Key Point(s)
1	Geosyntec	June 16, 2025	On June 16, 2025, Geosyntec Consultants submitted a technical memorandum to Waste Management describing the additional slope stability evaluation performed, assumptions made, and the results obtained regarding the FA2 toe berm slope stability and deformation analysis re-evaluation requested by the CVRWQCB during a May 28, 2025 in-person meeting.
2	CVRWQCB	September 15, 2025	In this letter, the CVRWQCB addresses outstanding insufficiencies in the March 21, 2025, Design Report for FA2, Partial Phase 8 Cell Expansion and Ground Improvements and has reminded Waste Management of the paths forward that are within compliance of the CDO. The CVRWQCB states, that Waste Management must submit a complete design plan for review that addresses all associated monitoring points and includes a Construction Quality Assurance Plan, consistent with Title 27, or, if pursuing an alternative proposal, monitoring placements satisfy the requirements of Title 27.

MONITORING WELLS

New or Pending Monitoring Wells Topics

	From	Format | Date	Key Point(s)
3	CVRWQCB	May 28, 2025	Representatives from the Program Lead for Title 27, the CVRWQCB Boards Permitting Unit, CVRWQCB Compliance and Enforcement Unit and Waste Management attended an in-person meeting to discuss revised alternative locations proposed for the FA2 toe berm monitoring wells, as proposed in the May 13, 2025, Technical Memorandum prepared by Geosyntec on behalf of Waste Management. Representatives of the CVRWQCB stated that the CVRWQCB is awaiting response from the California Department of Water Resources (DWR), California Division of Safety Dams (DOSD) to provide a response before any final approvals regarding monitoring well placement and construction of stability berm issues. Representative of Waste Management, Glen Roycroft, stated that the DOSD told Waste Management review could take 6 to 8 months and Waste Management plans to move forward with construction of soil improvements for stability berm – at their own risk.

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	From	Format | Date	Key Point(s)
4	CVRWQCB	September 15, 2025	The CVRWQCB has reviewed the May 2025 Revised Memo and determined that the proposal does not comply with CDO Requirement 1 and insufficient information is available to consider a proposed alternative. The CVRWQCB is requiring WM to pursue one of the following paths: 1. Propose well and probe placements in accordance with the CDO in its complete design plans; 2. Request an alternative to the CDO by submitting formal alternative well replacement plan that demonstrates equivalent or better protection of water quality, complies with all applicable requires of the WDR (except of those revised to reflect the alternative) and meets the requirements of the CCR Title 27 and 40 Code of Federal Regulations part 258. The CVRWQCB requires WM to submit a complete design plan for review that addresses all associated monitoring points and includes a CQA Plan consistent with Title 27. Absent of a design, the CVRWQCB staff cannot recommend a CDO alternative to the Board for consideration. WM may not propose an alternative groundwater detection monitoring network under CDO Requirement 1 without submitting a complete design report for staff review and approval. The requirement may be fulfilled through a JTD submission, which staff can incorporate into revised WDRs anticipated for 2026.

Exceedance in Monitoring Wells **Topics**

	From	Format | Date	Key Point(s)
5	WM	September 15, 2025	Waste Management provided the CVRWQCB with re-sample results for the 5-year Constituents of Concern (COC) at ALRRF. According to Waste Management, re-sample data did not verify initial indications of 5-year COC organic parameter detections for LSI-2, VZM, LSI-2 LD, LD-6, InBasinA and InBasinC samples; however, the data did partially confirm SVOC detections in LSI-1, VZM and LSI-1. For both the initial and re-sample, field staff noted "black floaty" material – suspended black material noted in the sample containers retroactively identified as particulate matter from riser and sump materials, such as piping and liners or from sampling equipment. Waste Management believes this material is the reason for SVOC detection in samples, indicating cross contamination from piping or sampling equipment containing these substances. SCS recommends no further action at this time.

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	From	Format | Date	Key Point(s)
6	WM	September 15, 2025	On July 15, 2025, Waste Management emailed CVRWQCB regarding the First Semiannual 2025 Groundwater Monitoring Report, prepared by SCS engineers, initial statistical exceedance for total Kjeldahl nitrogen (TKN) in groundwater monitoring wells MW-4A (FA1) and MW-8B (FA2) and for chemical oxygen demand (COD) in Fill Area 2 MW-19 and MW-62. Re-sampling was performed on July 29 and August 13, 2025. Re-sampling data did not verify the initial statistical exceedances for TKN in MW-4A and MW-8B or COD in MW-19 and MW-62. No further action is required. However, below reporting limit concentrations of TKN in MW-8B did confirm the initial statistical exceedance. Waste Management and SCS engineers do not believe that these below RL concentrations of TKN in MW-8B represent a measurably significant result and no further action is required.

OTHER TOPICS

CVRWQCB Inspections Topics

	From	Format | Date	Key Point(s)
7	CVRWQCB	NOV| May 14, 2025	The CVRWQCB has issued a Notice of Violation for the discharge of hazardous waste in violation of WDR requirements. In an April 22, 2025 email, Waste Management notified the CVRWQCB staff of the possible disposal of non-RCRA hazardous waste at ALRRF. "The waste originated from a PG&E power pole replacement project occurring adjacent to the Potrero MGP Northern Switchyard in San Francisco. Instead of placing onsite spoils in the bin provided for the project, the hydrovac conductor (Discovery Hydro) transported the wet spoils to the PG&E Oakport spoils yard and dumped approximately 200-gallons of untested wet spoils into a non-hazardous wet spoils bin on March 11, 2025. Once at the spoils yard, excess free liquid was decanted, and the remaining sludge was sent to Altamont Landfill." The STLCs detected for chromium and nickel were 12.5 mg/L and 83 mg/L, respectively, both exceeding the California Hazardous Waste levels for these constituents, which are 5 mg/L and 20 mg/L, respectively. The CVRWQCB is requiring the landfill to immediately isolate, remove and properly contain the hazardous waste, and arrange for its disposal at a permitted facility authorized to accept hazardous waste. The CVRWQCB is also requiring the landfill to submit a report documenting the offsite disposal of hazardous waste at a permitted facility authorized to accept hazardous waste by July 31, 2025.

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	From	Format | Date	Key Point(s)
8	CVRWQCB	NOV| May 27, 2025	The CVRWQCB has issued a notice of violation for discharging in violation of waste discharge requirements. On May 13, 2025, the CVRWQCB staff conducted an inspection at ALRRF. A violation was issued regarding windblown waste outside of a unit or portions of a unit specifically designed for their containment, "while volume of windblown waste observed across the Facility was significantly less than what had been observed during previous inspection, a significant volume of windblown waste was observed along and just beyond the completed eastern downslope, lined extent of FA2/Phase 6." The CVRWQCB requires Waste Management to immediately implement procedures to prevent future discharges of waste outside the completed, lined extent of FA2; and by July 20, 2025 submit a report with photographic evidence demonstration that all waste documented in the inspection report observed outside of the completed, lined limited of FA2 has been removed and properly disposed of. Additionally, the CVRWQCB issued 11 Areas of Concern regarding their facility inspection.
9	CVRWQCB	Inspection| June 5, 2025	On May 21, 2025, the CVRWQCB performed a pre-construction inspection of the FA2 Phase 8 cell construction and a construction inspection of the Altamont Solidification Facility (FA2 Solidification Basins). Staff also inspected other areas of the landfill including asbestos monofil, FA1 solidification basins and the valley drain collection point complex located in FA1, Unit 1. Additionally, the CVRWQCB is requesting submittal of a work plan for the decommissioning of the existing solidification basin atop FA1 by July 2, 2025.
10	WM	NOV Update June 19, 2025	In a June 19, 2025, letter, Waste Management states with various included attachments, that the calculated metal concentrations of the possibly hazardous sludge improperly disposed of are below STLC thresholds based on new information provided in a May 29, 2025 email from PG&E. This conclusion stems from the information that the approximately 100 gallons of possibly hazardous liquid/sludge was combined with approximately 3,800 gallons of nonhazardous sludge prior to transport to ALRRF. Waste Management believes that the follow-up actions specified in the May 14, 2025, NOV issued by the CVRWQCB are no longer applicable or necessary.
11	CVRWQCB	NOV Update July 7, 2025	In the July 7, 2025, CVRWQCB letter, the agency states that the update provided in the June 19, 2025, letter issued by

MEMO

	From	Format | Date	Key Point(s)
			Waste Management, does not provide any new analytical data, but provides further narrative regarding PG&E knowledge of the waste stream and likely percentage of hazardous waste include in the shipment sent to ALRRF. The CVRWQCB states that all requirements regarding the May 14, 2025, NOV remain in place, with a report documenting the proper offsite disposal of all hazardous waste due by July 31, 2025.
12	WM	NOV Update| July 25, 2025	In this July 25, 2025, letter, Waste Management responds to the May 14, 2025, NOV, issued to ALRRF by the CVRWQCB. Waste Management has provided lengthy statements under the topics as follows: I. WMAC's Notifications do not state that ALRRF received hazardous waste; and II. CVRWQCB Staff do not have evidence that ALRRF received hazardous waste. Waste Management has called for the NOV to be rescinded because, as stated by Waste Management in this letter, the findings and conclusions have no evidentiary support.
13	WM	July 30, 2025	In a letter dated July 30, 2025, Waste Management provides the CVRWQCB with completion updates regarding AOC #9 and AOC #10.
14	WM	August 29, 2025	Waste Management provided the CVRWQCB with a response to the May 27, 2025, letter concerning the landfill inspection that took place on May 13, 2025, documenting one violation and 11 AOCs. This letter documents the completion of AOCs 1 through 8. AOC 11 anticipates completion by October 15, 2025, and the efforts will be documented in the Winterization Report for 2025-2026.
15	CVRWQCB	November 10, 2025	The CVRWQCB staff performed a pre-construction inspection for FA2 Phase 8 cell construction pursuant to Title 27 Section 20310(e) at the ALRRF. This inspection included observations of activities related to the initiation of construction of a planned waste management unit – FA2 Partial Phase 8 Cell Expansion and Ground Improvements. The CVRWQCB has not approved construction of planned waste units and is requesting and requiring additional information by December 15, 2025.

MEMO

Winterization Plan Topics

	From	Format | Date	Key Point(s)
16	WM	November 14, 2025	The ALRRF Winterization Plan 2025 – 2026 prepared on November 14, 2025, documents the site-specific winter preparation tasks as needed to ensure compliance with the WDR, improve site drainage controls and minimize erosion during the rainy season.

LANGAN

Memorandum

135 Main Street San Francisco, CA 94104 T: 415.955.5200 F: 415.955.5201

To: ALRRF Community Monitor Committee

From: Langan – Community Monitor

Date: January 14, 2026

Re: **CMC Meeting of 1/14/26 - Agenda Item 6.5 - Updates on PFAS regulations and monitoring requirements**

PFAS MONITORING

The Committee Members have expressed continued interest in new developments related to per- and polyfluoroalkyl substances (PFAS) to better understand future requirements that may affect the landfill. Products known to contain PFAS are regularly disposed of in landfills.

California and Federal agencies are in the process of evaluating health risks and developing guidance for PFAS.

New Information

On October 29, 2025, the State of California, under the authority of the Deputy Director of the State Water Board's Division of Drinking Water (DDW), issued revised notification and response levels for perfluorooctanoic acid (PFOA), perfluorooctanesulfonic acid (PFOS), perfluorohexane sulfonic acid (PFHxS) and perfluorohexanoic acid (PFHxA).[1]

Notification and response levels are non-regulatory, health-based advisory levels established for contaminants in drinking water. Maximum contaminant levels for drinking water have not yet been established. The revised levels are:

- PFOA: notification level = 4.0 ng/l, response level = 10 ng/l
- PFOS: notification level = 4.0 ng/l, response level = 40 ng/l
- PFHxS: notification level = 3.0 ng/l, response level = 10 ng/l
- PFHxA: notification level = 1.0 mg/l, response level = 10 mg/l

"Notification and response levels are established as precautionary measures for contaminants that may be considered candidates for establishment of maximum contaminant levels, but have not yet undergone or completed the regulatory standard setting process prescribed for the development of maximum contaminant levels and are not drinking water standards."[1]

A response level is the level at which DDW recommends removal of a drinking water source from service.

[1] New and Revised Drinking Water Notification and Response Levels for PFOA, PFOS, PFHxS, and PFHxA

A notification level requires the drinking water system to "notify the local governing body of the local agency in which the users of the drinking water reside." These levels are not directly applicable to ALRRF but may apply to drinking water wells associated with residences located along Dyer Road, in the vicinity of the landfill.

Old Information (Chronological from Oldest to Newest)

At the ALRRF, PFAS were sampled in November 2019 in response to the State Water Resources Control Board's (SWRCB) investigative order (WQ 2019-0006-DWQ). The PFAS samples were analyzed by Eurofins TestAmerica in West Sacramento.

Leachate samples for Fill Area 1 reported total concentrations from approximately 21,000 to 26,000 parts per trillion (ppt). Fill Area 2 leachate sample (LS-4) reported concentrations considerably lower, with a total concentration of approximately 2,700 ppt. Trace concentrations (<2.0 ppt) of three PFAS compounds were detected in background monitoring well PC-6B(R), located up gradient of Fill Area 2. Trace concentrations of two PFAS compounds were reported in detection monitoring well PC-1B, located downgradient of Fill Area 2. Monitoring wells MW-4A and MW-13B reported small concentrations of PFAS, with total concentrations of 57 and 98 ppt. PFAS compounds were reported at higher concentrations in groundwater monitoring wells in the previously affected assessment and corrective action areas. In particular, wells E-05 and E-07 reported concentrations of approximately 2,000 and 1,200 ppt, respectively. Concentrations for wells E-20B and MW-20 were 650 and 670 ppt, respectively.

The concentrations reported at the ALRRF were below the maximum concentrations for groundwater and leachate at other landfills covered by the PFAS Order, and within the middle of the range. Neither the SWRCB nor the Central Valley Regional Quality Control Board (CVRWQCB) have requested additional monitoring at this moment.

On May 18, 2022, the U.S. Environmental Protection Agency (EPA) added five PFAS to a list of risk-based values for site cleanups[2]. These levels are used by the EPA and other agencies in the investigations of contaminated sites. No updates to the risk-based values have occurred for PFAS since May 2022.

On June 15, 2022 the EPA announced new drinking water health advisories for PFAS[3]. The EPA issued interim, updated drinking water health advisories for two substances and final health advisories for two additional substances. These health advisories inform the maximum contaminant levels allowed in drinking water, and would not have an effect at this moment on landfills.

On August 17, 2022 the Division of Drinking Water presented at the State Water Resource Control Board meeting on the Notification and Response Levels for Perfluorohexane Sulfonic

[2] https://www.epa.gov/risk/regional-screening-levels-rsls-whats-new
[3] https://www.epa.gov/newsreleases/epa-announces-new-drinking-water-health-advisories-pfas-chemicals-1-billion-bipartisan

Acid[4]. There is continued progress through the discussion of this topic from regulatory agencies but at this time no direct regulatory updates have occurred.

On August 26, 2022 the EPA announced under the Administrator Regan's PFAS Strategic Roadmap, significant action to protect communities health from the risks posed by certain PFAS's[5]. The EPA is proposing that PFAS become designated as a hazardous substance under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), or "Superfund." This would increase transparency around the releases of PFAS and help hold polluters accountable for the cleanup. This proposal applies toward PFOA and PFOS.

On March 14, 2023, the EPA announced proposed national primary drinking water maximum contaminant levels (MCLs) for six PFAS (PFOA and PFOS as individual contaminants, and four contaminants as a PFAS mixture). The proposed regulation would require public water systems to monitor, notify the public of the contaminant levels, and treat drinking water to reduce the levels of these PFAS if they exceed the proposed MCLs[6]. California-specific MCLs for PFAS have not yet been established as of March 2023[3], and the proposed regulations do not require any actions until finalized, likely by the end of 2023[7].

On May 4, 2023, the EPA generated tables that reflect changes in the toxicity and chemical specific parameters per regional screening levels hierarchies[7]. The table compares the previous toxicity database to this new and current table. This update is in response to the Integrated Risk Information System (IRIS) which is a part of the risk assessment process in which hazard identification and dose-response assessment are applied to derive toxicity values.

On February 1, 2024, the Biden-Harris Administration announced new steps to protect communities from PFAS and other emerging chemicals of concern.[8] The EPA is proposing to modify the definition of hazardous waste as it applies to the cleanups permitted at hazardous waste facilities to ensure the EPA's regulations are clearly reflected and authorizes states authorities to require the cleanup of the full range of substances under the Resource Conservation and Recovery Act (RCRA). The EPA states that the proposed rules would "strengthen protections for communities and drinking water supplies located near the 1,740 permitted hazardous waste facilities across the nation." This would include corrective action under RCRA, requiring facilities that treat, store, or dispose of hazardous waste to investigate and mitigate hazardous releases into soil, groundwater, surface water and air. The EPA will publish the proposals in the Federal Register.

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[4] https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/pfas.html
[5] https://www.epa.gov/newsreleases/epa-proposes-designating-certain-pfas-chemicals-hazardous-substances-under-superfund
[6] https://www.epa.gov/sdwa/and-polyfluoroalkyl-substances-pfas
[7] https://www.epa.gov/sdwa/and-polyfluoroalkyl-substances-pfas
[7] https://www.epa.gov/risk/regional-screening-levels-rsls-whats-new

[8] https://www.epa.gov/newsreleases/biden-harris-administration-announces-new-steps-protect-communities-pfas-and-other

Regarding corrective actions, known technologies for treating PFAS in water include granular activated carbon, ion exchange, and reverse osmosis[9]. Granular activated carbon and ion exchange resins remove chemicals by sorption (the chemical is attached to the media), which reduces concentrations of chemicals in the effluent water of the system. Reverse osmosis removes contaminants by pushing water through a semipermeable membrane, effluent water has less chemicals, and a portion of the water (rejected water or concentrate) is collected for disposal. PFAS do not degrade in the environment, and one of the few technologies that can potentially destroy PFAS is incineration.

On April 10, 2024, the EPA announced the final National Primary Drinking Water Regulation (NPDWR) for six PFAS.[10] Legally enforceable MCLs for six PFAS in drinking water have been finalized: PFOA, PFOS, PFHxS, PFNA and HFPO-DA and PFBS, using a Hazard Index MCL. The EPA also finalized health-based, non-enforceable MCL goals for these PFAS. The EPA is making funding available to ensure clean and safe water, $1 billion dollars in funds will be accessible through the new 'Bipartisan Infrastructure Law' helping states and territories implement PFAS testing and treatment at public water systems, and to help private owners of wells address PFAS contamination. The EPA is prioritizing funding based on a formula that includes factors for population below poverty, small water systems, and occurrence of unregulated emerging contaminants.[11]

On April 19, 2024, the EPA announced that it was designating two types of PFAS, perfluorooctanoic acid (PFOA) and perfluorooctanesulfonic acid (PFOS) as Comprehensive Environmental Response Compensation and Liability Act (CERCLA) hazardous substances. EPA does not intend to pursue entities such as publicly owned/operated municipal solid waste landfills for PFAS under CERCLA.

On 8 July 2024, the EPA final rule designating two PFAS (PFOA and PFOS), including their salts and structural isomers - as hazardous substances under CERCLA became effective. In response, Langan reviewed the Data Submittal for Compliance with 13267 Order WQ 2019-0006-DWQ prepared by Wood Environment & Infrastructure Solutions, Inc., 2019, on behalf of Waste Management, to understand concentration of CERCLA PFAS at the landfill. This report was produced in response to the State Water Resources Control Board (SWRCB) Order that required groundwater and leachate sampling for per- and polyfluoroalkyl substances.

The SWRCB ESLs for direct exposure human health risk levels (MCL priority) is 6.5 nanograms/L (ng/L) for PFOA and 5.1 ng/L for PFOS. The EPA Final MCLs for PFOA and PFOS are 4 parts per trillion (ppt) or 4 ng/L. These criteria are for drinking water.

PFOA was detected in leachate above the MCL priority at:

- 1,200 ng/L (LS1)

[9] Interstate Technology and Regulatory Council (ITRC), 2022. Treatment Technologies – PFAS — Per- and Polyfluoroalkyl Substances. https://pfas-1.itrcweb.org/12-treatment-technologies/#12_1. Accessed on March 10, 2022.

[10] https://www.epa.gov/sdwa/and-polyfluoroalkyl-substances-pfas

[11] https://www.epa.gov/system/files/documents/2023-02/EC%20Grant%20implementation%20manual_February%202023_final_508_0.pdf

- 59 ng/L (LSI-4)
- 1,600 ng/L (LS2)

PFOS was detected in leachate above the MCL priority at:

- 130 ng/L (LS1)
- 26 ng/L (LSI-4)
- 110 ng/L (LS2)

PFOA was detected in groundwater above the MCL priority at:

- 10 ng/L (MW-13B)
- 10 ng/L (MW-4A)
- 80 ng/L (MW-20)
- 400 ng/L (E-05)
- 150 ng/L (E-07)
- 130 ng/L (E-20B)

PFOS was detected in groundwater above the MCL priority at:

- 110 ng/L (MW-20)
- 36 ng/L (E-05)
- 26 ng/L (E-07)
- 7.9 ng/L (E-20B)

On January 20, 2025, the President of the United States issued a Presidential Memorandum on Regulatory Review. In this memorandum, it states that:

- No new rules are to be proposed or issued until reviewed and approved by a new department or agency head.
- Any rules sent to the Office of the Federal Register but not yet published must be withdrawn for review and approval
- To consider postponing the effective date of published or issued but not yet effective rules
- If no substantial questions arise, no further action is needed. For rules with substantial questions, notify and consult with the Office of Management and Budget (OMB) Director for appropriate action.

With this memorandum, the EPA delayed the effective date for "Implementing Statutory Addition of Certain Per- and Polyfluoroalkyl Substances (PFAS) to Toxics Release Inventory (TRI) Beginning with Reporting Year 2025" from 5 February 2025 to 21 March 2025. This final rule would subject nine PFAS to the same reporting rules as other chemicals of "special concern."

The Office of Information and Regulatory Affairs, of the Office of Management and Budget per the Executive Office of the President on 21 January 2025 withdrew EPA's proposed rule on the *Clean Water Effluent Limitation Guidelines and Standards for PFAS Manufacturers Under the Organic Chemicals, Plastic and Synthetic Fibers Point Source Category*. The concluded action is that this regulatory review has been withdrawn.

On September 17, 2025, the EPA released an announcement that the Department of Justice submitted a court filing on behalf of the EPA related to the designation of perfluorooctanoic acid (PFOA) and perflurooctanesuflonic acid (PFOS) as CERCLA hazardous substances[12]. The EPA notes that the CERCLA designation can impose costly requirements on entities who release hazardous substances to the environment, which can include "passive receivers" such as entities who receive PFAS in waste like a landfill. EPA goes on to note that they continue to collect information about how passive receivers are saddled with unknown liability and costs related to receipt of PFAS and how a possible solution is a statutory fix to protect passive receivers. EPA also intends to develop a CERCLA Framework Rule to "provide a uniform approach to guide future hazardous substance designations, including how the agency will consider the costs of proposed designations." EPA notes that costs to manufacturers, passive receivers, consumers, and the economy should be taken seriously during future designations. This announcement may mean that the future listing of other PFAS compounds as hazardous substances will be highly limited/restricted, if it occurs at all, and the EPA may seek to protect or exempt landfills and other passive receivers from responsibilities related to indirect PFAS contamination (i.e., other than manufacture or generation of PFAS).

[12] https://www.epa.gov/newsreleases/trump-epa-announces-next-steps-regulatory-pfoa-and-pfos-cleanup-efforts-provides

LANGAN

135 Main Street San Francisco, CA 94015 T: 415.955.5200 F: 415.955.5201

Memorandum

To: ALRRF Community Monitor Committee

From: Langan, Community Monitor

Date: January 14, 2026

Re: **CMC Meeting of 1/14/26 – Agenda Item 6.6 – Reports From Community Monitor**

ALTAMONT MONTHLY OPERATIONS AND RECORDS REVIEW

During the fourth quarter of 2025, four site visits were performed by the Community Monitor. In addition to site visits, summaries of LEA inspections available on CalRecycle's website are reviewed and important issues are highlighted in the monthly reports. The reports in this item include:

- Community Monitor Site Visit for July, which took place on September 26, 2025.
- Community Monitor Site Visit for August, which took place on October 24, 2025.
- Community Monitor Site Visit for August, which took place on November 21, 2025.
- Community Monitor Site Visit for August, which took place on December 2, 2025.

Details about operations-related matters are provided in the attached reports. For the fourth quarter: disposal operations occurring in FA2, Phase 1 and 6; continued operations within FA1 solidification basins, continued construction of FA2 solidification basins, continued correspondence with the CVRWQCB regarding May 14, 2025, NOV, fence installation progression and wind-blown litter mitigation.

During the fourth quarter of 2025, there was one special occurrence which is discussed further in the October monthly report.

ALRRF Reports from Community Monitor

September 2025

Site Visit September 26, 2025, 10:00 AM – 12:00 PM

- Attended by Megan Rollo (Langan, Community Monitor)
- Escort: Sonam Kaur (Waste Management), announced.
- Weather: Sunny, 72°F.

General Observations

- Traffic to the site was flowing freely through the road and the entrance of the landfill upon arrival.
- The scale houses appeared to be in good condition.
- Litter observed in and around roadways throughout site.

Fill Area 1

- Fill Area 1 (FA1) was observed at the LSI ponds.
- The LSI ponds were in good condition. LSI-2, which holds underdrain and rainwater was observed with 11 feet of freeboard.
- LSI-1, which holds leachate, had 9 feet of freeboard.

Fill Area 2

- Landfill operations were occurring in Phase 2 for public use and Phase 6 for commercial use.
- Some birds present.
- No active tippers present in FA2 at time of observation.
- Several piles of ADC present.
- Winterization efforts for area observed at south end of Phase 5.

Back-40 and Bethanny Reservoir

- Some litter observed in the Back-40.

Solidification Basins in FA1

- Appear to be in good condition.
- Three trucks are present at basins during observation.

Solidification Basins in FA2

- Construction of the solidification basins in FA2 continue.

Other Environmental Observations / Issues

- According to the LEA September Site Visit, "two of the most recent gas monitoring reports indicate GP-15A has been below regulatory threshold of 5% methane by volume in air. Waste Management stated results for the lab analysis of the gas has been received and will be updated after discussing results with engineering team."

- ALRRF has continued to focus on removing litter that has migrated onsite to minimize the source of litter that could be blown offsite in a wind event. There is a litter crew of 14 people total, who are currently working on clearing litter that has migrated onsite.

Special Occurrences

- There were no special occurrences for the month of September.

ALRRF Community Monitor Monthly Report — September 2025

Monthly Tonnage Report for September 2025, received October 15, 2025

Tonnage Summary:		tons	
	Disposed, By Source Location		
1.1	Tons Disposed from Within Alameda County	80,832.94	
1.2	Other Out of County Disposal Tons	1,699.18	
	subtotal Disposed	82,532.12	
	Disposed, By Source Type		
2.1	C&D	905.72	
2.2	MSW	79,244.66	
2.3	Special Wastes	2,401.74	
	subtotal Disposed	82,552.12	
		20.00	0.02%
	Other Major Categories		
2.4	Re-Directed Wastes (Shipped Off Site or Beneficially Used)	0.17	
2.5	Revenue Generating Cover	90,813.88	
	Total, 2.1 - 2.5	173,366.17	
	Materials of Interest		
2.1.1	Fire Debris	905.72	
2.3.1	Friable Asbestos	770.64	
2.3.2	Treated Wood	105.83	
2.5.1	Class 2 Cover Soils	59,312.87	
2.5.2	Auto Shredder Fluff	14,054.78	
2.5.3	Processed Green Waste/MRF fines, Beneficial Use (GSET)	0.00	
2.5.4	MRF Fines for ADC	190.05	

ALRRF Reports from Community Monitor

October 2025

Site Visit October 24, 2025, 10:00 AM – 12:00 PM

- Attended by Megan Rollo (Langan, Community Monitor)
- Escort: Sonam Kaur (Waste Management), announced.
- Weather: Sunny, 58°F, light wind.

General Observations

- Traffic to the site was flowing freely through the road and the entrance of the landfill upon arrival.
- The scale houses appeared to be in good condition.
- Litter observed in and around roadways throughout site.

Fill Area 1

- Fill Area 1 (FA1) was observed at the LSI ponds.
- The LSI ponds were in good condition. LSI-2, which holds underdrain and rainwater was observed with 10 feet of freeboard.
- LSI-1, which holds leachate, had 8 feet of freeboard.

Fill Area 2

- Landfill operations were occurring in Phase 2 for public and commercial use.
- Some birds were present.
- One tipper present in FA2.
- Several piles of ADC present.
- Winterization efforts observed.

Back-40 and Bethanny Reservoir

- Some litter observed in the Back-40.

Solidification Basins in FA2

- Construction of the solidification basins in FA2 continues.

Special Occurrences

- There was one special occurrence in October. On October 7, 2025, a high-side trailer flipped over in FA 2 Phase 6 because the load was stuck to the trailer. The tipping pad did not play a factor in the flip over as the tipping pad was even. No WM equipment or vehicles were involved. No injuries reported.

ALRRF Community Monitor Monthly Report — October 2025

Monthly Tonnage Report for October 2025, received November 15, 2025

Tonnage Summary:		tons	
	Disposed, By Source Location		
1.1	Tons Disposed from Within Alameda County	82,635.87	
1.2	Other Out of County Disposal Tons	2,147.31	
	subtotal Disposed	84,783.18	
	Disposed, By Source Type		
2.1	C&D	449.38	
2.2	MSW	81,254.24	
2.3	Special Wastes	3,079.56	
	subtotal Disposed	84,783.18	
		0.00	0.00%
	Other Major Categories		
2.4	Re-Directed Wastes (Shipped Off Site or Beneficially Used)	1.01	
2.5	Revenue Generating Cover	85,112.32	
	Total, 2.1 - 2.5	169,896.51	
	Materials of Interest		
2.1.1	Fire Debris	449.38	
2.3.1	Friable Asbestos	1,042.34	
2.3.2	Treated Wood	187.67	
2.5.1	Class 2 Cover Soils	40,904.81	
2.5.2	Auto Shredder Fluff	18,676.38	
2.5.3	Processed Green Waste/MRF fines, Beneficial Use (GSET)	0.00	
2.5.4	MRF Fines for ADC	396.14	

ALRRF Reports from Community Monitor

November 2025

Site Visit November 21, 2025, 9:00 AM – 11:00 PM

- Attended by Megan Rollo (Langan, Community Monitor)
- Escort: Sonam Kaur (Waste Management), announced.
- Weather: Sunny, 75°F, Windy.

General Observations

- Traffic to the site was flowing freely through the road and the entrance of the landfill upon arrival.
- Site very saturated from recent periods of rainfall. LSI Ponds not accessible due to road conditions.
- The scale houses appeared to be in good condition.
- Litter observed in and around roadways throughout site.

Fill Area 2

- Landfill operations were occurring on Phase 6 for public use and commercial use.
- Some birds present.
- Three tippers present in FA2.
- Several piles of ADC present.
- Winterization of Phase 1 completed.

Back-40 and Bethanny Reservoir

- Some litter observed in the Back-40.

Solidification Basins in FA2

- Construction of the solidification basins in FA2 continue to move forward. See photos below.
- CVRWQCB on-site with FA2 basins for permitting.

Special Occurrences

- No special occurrences for the month of November.

ALRRF Community Monitor Monthly Report **November 2025**

Monthly Tonnage Report for November 2025, received December 15, 2025

Tonnage Summary:		tons	
	Disposed, By Source Location		
1.1	Tons Disposed from Within Alameda County	72,268.50	
1.2	Other Out of County Disposal Tons	1,607.07	
	subtotal Disposed	73,875.57	
	Disposed, By Source Type		
2.1	C&D	281.03	
2.2	MSW	73,975.93	
2.3	Special Wastes	2,592.55	
	subtotal Disposed	76,849.51	
		2,973.94	3.87%
	Other Major Categories		
2.4	Re-Directed Wastes (Shipped Off Site or Beneficially Used)	1.62	
2.5	Revenue Generating Cover	44,517.09	
	Total, 2.1 - 2.5	121,368.22	
	Materials of Interest		
2.1.1	Fire Debris	93.67	
2.3.1	Friable Asbestos	619.60	
2.3.2	Treated Wood	92.28	
2.5.1	Class 2 Cover Soils	13,087.35	
2.5.2	Auto Shredder Fluff	12,663.37	
2.5.3	Processed Green Waste/MRF fines, Beneficial Use (GSET)	0.00	
2.5.4	MRF Fines for ADC	252.14	

ALRRF Reports from Community Monitor

December 2025

Site Visit December 2, 2025, 9:30 AM – 12:00 PM

- Attended by Megan Rollo (Langan, Community Monitor), Ryan Hammon; Aide Villegas (LEA)
- Escort: Louis Rocha (Waste Management), unannounced.
- Weather: Sunny, 52°F, poor air quality.

General Observations

- Traffic to the site was flowing freely through the road and the entrance of the landfill upon arrival.
- The scale houses appeared to be in good condition.

Fill Area 1

- Fill Area 1 (FA1) was observed at the LSI ponds.
- The LSI ponds were in good condition. LSI-2, which holds underdrain and rainwater was observed with 11 feet of freeboard.
- LSI-1, which holds leachate, had 7 feet of freeboard.

Fill Area 2

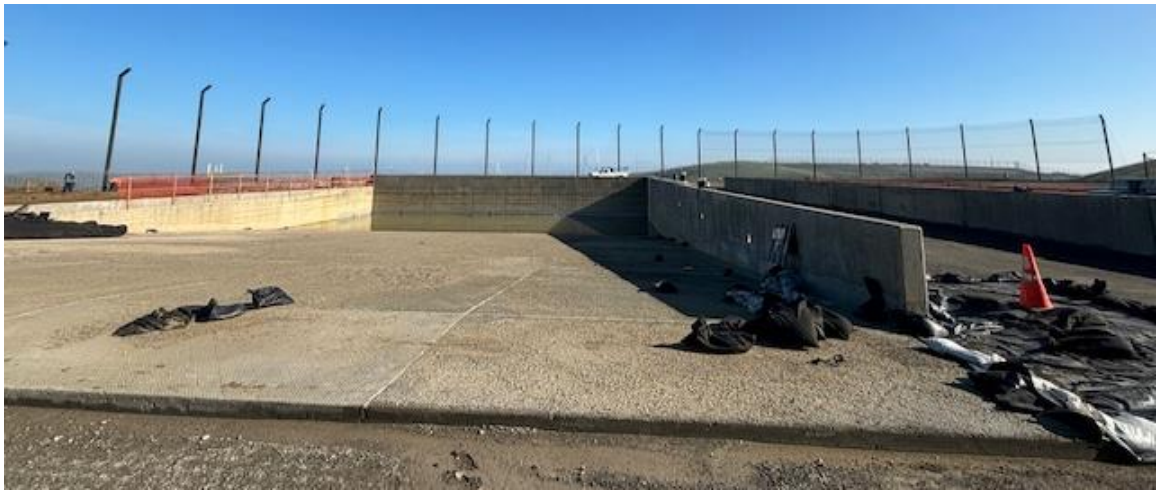
- Landfill operations were occurring on Phase 6 for public use and commercial use.
- Some birds present.
- Three tippers present in FA2.
- Several piles of ADC present.
- Winterization efforts for site to begin in October.

Back-40 and Bethanny Reservoir

- Some litter observed in the Back-40.
- No litter observed on the roadway to and at Bethanny Reservoir.

Solidification Basins in FA2

- Construction of the solidification basins in FA2 continue.



Other Environmental Observations / Issues

Special Occurrences

- There were no special occurrences during the month of December.

LANGAN

Memorandum

135 Main Street San Francisco, CA 94015 T: 415.955.5200 F: 415.955.5201

To: ALRRF Community Monitor Committee

From: Langan – Community Monitor

Date: January 14, 2026

Re: **CMC Meeting of 1/14/26 - Agenda Item 6.7 - Topics for 2025 Annual Report**

The Annual Report for 2025 is attached. The list below summarizes the topics-of-interest for 2025 that were identified by Committee Members. Each of these is addressed or updated in the appropriate section(s) within the reports, and those sections are identified below.

Topic	Section(s)
Fill Area 2 operations and expansion	
Construction Activity during 2025	2.2 – 1st bullet
Monitoring well replacement	2.2 – 2nd bullet
Cease and Desist Order (CDO)	2.3.2.2
Fill Area 2 Detection Monitoring Program	
MW-4A Evaluation Monitoring Program	
Fill Area 1 Corrective Action Program	
Solidification basins	
Windblown litter incidents and controls	1.2, 1.4, 2.2, 2.3
ET cover	2.2 – 4th bullet

Information has been updated through the report to reflect changes that have occurred this year.

COMMUNITY MONITOR ANNUAL REPORT 2025
ALTAMONT LANDFILL AND RESOURCE RECOVERY FACILITY
Livermore, California

Prepared For:

ALRRF Community Monitor Committee

Prepared By:

Langan CA, Inc.
135 Main Street, Suite 1500
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Senior Project Manager

Mukta Patil, PE
Associate

January 14, 2026
750657606

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1.0 INTRODUCTION

1.1 Background: Settlement Agreement

In December 1999, a Settlement Agreement was reached among parties involved in a lawsuit regarding the proposed expansion of the Altamont Landfill and Resource Recovery Facility (ALRRF). The settlement limited the expansion to a second permitted operational area, known as Fill Area 2 (FA2), adjacent to the existing Fill Area 1 (FA1). The Settlement Agreement established the Community Monitor Committee (CMC) and a funding mechanism for its technical consultant, the Community Monitor (CM).

The Settlement Agreement defines the purview of the CMC and the CM. The CM's scope of work is further defined in a contract between the CM and the CMC. The City of Livermore provides staff and administrative support to the CMC, as well as management of the CM contract and space for CMC meetings. The City also acts as financial agent for the CMC, pursuant to a letter agreement dated July 6, 2004.

In broad terms, the CM is to review certain reports and information, as defined; monitor incoming traffic by conducting truck counts, as described in the Settlement Agreement; and inspect the ALRRF site no more than twelve times each year. The Settlement Agreement describes the CM's Scope of Work to include "issuing a written report each year summarizing the ALRRF's compliance record for the period since the last such report with respect to all applicable environmental laws and regulations." This Annual Report provides that summary for 2025.

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

1.2 Prior Community Monitor Work

Records indicate that the CMC retained a technical consultant as the CM from 2005 through part of 2007.

In mid-2007, the CMC selected the current CM team of Environmental Science Associates (ESA) and Langan (formerly Treadwell & Rollo). This team began work in February 2008. From 2008 through 2019, the team carried out report reviews, Class 2 soil analysis file review, and site inspections as defined in the Settlement Agreement. From 2020, after a public procurement process to select a continuing CM, the CM team of Langan and ESA switched roles, with Langan

as the primary CM and ESA as a sub-contractor to Langan. The CM team continues to carry out report reviews, Class 2 soil analysis file review, and site visits, as defined in the Settlement Agreement.

- In 2008, the primary concern was the rate at which groundwater monitoring wells were purged during sampling. This was resolved satisfactorily.
- In 2009, the CM team took a close look at the methodology used by ALRRF and its consultants to track variations in groundwater quality. No Areas of Concern (AOCs) were identified.
- In 2010, landfill gas perimeter probes were installed to comply with new regulations, and one of those probes detected landfill gas at levels that exceeded regulatory limits. This was abated by installing several gas extraction wells close to those probes.
- In 2011, the ALRRF sought to use fine material[1] from the Davis Street Material Recovery Facility (MRF) as Alternative Daily Cover. The use of this material was approved by the LEA through a special study in 2013.
- In 2012, two ongoing problems, windblown litter and seagull activity, became more severe; and while the gull problem has varied seasonally, the litter problem has continued.

Since mid-2013, the CM's observations and document reviews have included the construction of FA2 and related mitigation measures. The excavation and preparation of the Phase 1 portion of FA2, together with related improvements, were monitored in 2014 and 2015.

In 2015, the Five-Year Permit Review process began when the Alameda County Department of Environmental Health, the Local Enforcement Agency (LEA), requested the ALRRF to submit an application and a revised draft of its Joint Technical Document[2] (JTD), which contains a detailed description of FA2 development plans, design details, and operating procedures. On July 31, 2015, the revised JTD was submitted to the LEA and the Central Valley Regional Water Quality Control Board (CVRWQCB). The Five-Year Permit Review process was completed in 2020. Waste Discharge Requirements (WDRs) and Ceased and Deist Orders (CDOs) were issued by the CVRWQCB in mid-2016.

1 MRF fines: Fine material produced by sorting systems that recover materials at the Davis Street Transfer Station.

2 Under California regulations, a Joint Technical Document (JTD) is a detailed description of all of the means and methods by which a disposal site will satisfy State requirements to protect water resources and safely dispose of permitted wastes.

Throughout this process, the LEA held its permit review in abeyance while CVRWQCB staff prepared, and the CVRWQCB adopted, the WDRs. Subsequently, the LEA's review required more than four years to complete. It was difficult for the ALRRF to refine its JTD to conform to the requirements of the WDRs and subsequent directives from CVRWQCB staff, and the sheer size and complexity of the JTD itself also impeded progress. The JTD, after several revisions, was finalized on April 30, 2020. The Five-Year Solid Waste Facility Permit (SWFP) was finalized and issued on September 2, 2020.

In 2021, as a result of COVID-19 health emergency and the statewide Shelter-in-Place Order issued in early March 2020, the CM site visits were suspended from January through March 2021. In 2022, FA2 Phase 5 cell and stormwater construction improvements were authorized by the CVRWQCB. These improvements were completed in October 2023. Large winter storms occurred throughout the end of 2022 into the beginning of 2023, causing erosion at the landfill. The CVRWQCB issued 14 AOCs in April of 2023 regarding these erosional areas. WM completed the improvements to damaged areas in September 2023. During 2024, WM received two NOVs regarding discharge in violation of WDRs. Additionally, ALRRF completed construction of FA 2 Phase 6 and Phase 7 in 2024.

1.3 Regional Context and Landfill Capacity Needs

Events in the landfill disposal industry and demographic shifts within the greater Bay Area have affected, and may continue to affect, operations and future developments at the ALRRF. Prior Annual Reports have discussed impending landfill capacity changes and changes in landfill usage that could directly affect the life expectancy of regional landfills including the ALRRF.

Those issues have largely abated, but legislative and regulatory developments have resulted in new implications for landfill life in the region and statewide. The bellwether for this trend was AB 1594, which was passed in 2014. As of January 1, 2020, the use of green material as alternate daily cover (ADC) does not constitute diversion through recycling and is considered disposal for purposes of measuring a jurisdiction's 50 percent per capita disposal rate.

The 2015-2016 legislative session in California gave rise to several new laws that are intended to dramatically reduce the disposal to landfill of organic wastes (plant debris, food scraps and similar

materials that readily decompose and produce methane, a potent greenhouse gas). In Alameda County, this material is approximately 30% of the waste stream[3,4].

The two pieces of 2016 legislation with the most direct effect are SB 1383 and AB 901. SB 1383 established targets to achieve a 50 percent reduction in the statewide disposal of organic waste from the 2014 level by 2020, and a 75 percent reduction by 2025. AB 901 changed how disposal and recycling is reported to California Department of Resources Recycling and Recovery (CalRecycle). The intended effect is to provide a more accurate assessment of progress toward State goals. Regulations that implement these measures are now in place, and CalRecycle is providing resource documents and workshops to support implementation[5].

One result of this activity has been a tangible commitment by waste industries in California to provide additional organics diversion facilities. In Alameda County, two examples are the 500 tons per day Covered Aerated Static Pile (CASP) facility at the ALRRF, and the implementation of 100 tons per day of anaerobic digestion and subsequent composting capacity at the Davis Street Transfer Station. Taken together, these could reduce disposal at the ALRRF by up to 600 tons per day, which would be a 25% reduction in the current rate of disposal there. This reduction may be offset somewhat by the need for disposal of contaminants and oversize materials from compost operations.

Related State legislation passed in the 2017-2018 session provided further support for waste reduction through product stewardship, packaging, and enhanced organics-diversion requirements. The legislation passed in the first year of the 2019-2020 session has continued to focus on product stewardship while also removing some requirements to provide buy-back recycling centers.

Against this backdrop, the ALRRF began operation in FA2 on March 25, 2019. This triggered several constraints on the types, quantities and sources of materials received; these are described in the next section of this report. On April 27, 2022, the CVRWQCB conducted a final inspection and onsite meeting for FA2 Phase 4. Throughout 2022, Phase 4 continued to be the active phase of FA2. In October of 2023, construction at Phase 5 was completed and Phase 4

3 CalRecycle 2014 Waste Characterization Study: https://www2.calrecycle.ca.gov/WasteCharacterization/ , accessed December 2017.

4 Alameda County 2017-2018 Waste Characterization Study: http://www.stopwaste.org/sites/default/files/2017-18%20Alameda%20County%20Waste%20Characterization%20Study.pdf , accessed December 2018.

5 https://calrecycle.ca.gov/organics/slcp/education, accessed December 2023.

and Phase 5 have been the active phases of FA 2. During 2024, WM completed construction of FA 2, Phase 6 and Phase 7.

1.4 Site-Specific Constraints and Opportunities

The 1999 Settlement Agreement added constraints on operations, by adding new conditions to the Conditional Use Permit for the ALRRF. Solid waste from out-of-county sources were strictly limited to those covered by existing disposal agreements. During peak traffic hours, the number of refuse trucks entering the landfill is limited. Numerous conditions intended to protect natural resources on the ALRRF property were imposed. These were extensively refined during the development of permit conditions from the State and Federal natural resource agencies with permit authority: The US Army Corps of Engineers, the US Fish and Wildlife Service, the California Department of Fish and Wildlife, and the (CVRWQCB). This process required several years and concluded in 2012.

Some of these conditions did not take effect until FA2 began to receive refuse, on March 25, 2019. These conditions include limitations on the amounts of sludge, inert waste and special waste accepted from certain Bay Area counties, as well as self-hauled waste from Contra Costa County. The specific restrictions are:

- Wastes collected for disposal under a municipal franchise may only be received from Alameda County, San Francisco, and the City of San Ramon in Contra Costa County. San Francisco and San Ramon wastes can only be received if those jurisdictions meet specified waste diversion goals.

- Non-franchise waste may only be received for disposal from Alameda County and San Francisco, plus up to 25,000 tons per year of sludge, inert waste and special waste from the other seven Bay Area counties. In addition, up to 25,000 tons per year of self-hauled waste from Contra Costa County may be disposed.

Also, under the Settlement Agreement the size of the future expansion area was limited to 40 million tons of capacity, with a footprint of approximately 250 acres. In addition to Conditional Use Permit conditions, the Settlement Agreement established the CMC and the CM role, as described above; and it established mitigation funding related to the landfill expansion.

The physical setting of the ALRRF site presents certain constraints and opportunities. Canyons provide convenient high-volume fill sites, but hilly terrain and local high winds in the Altamont area require constant attention to windblown litter, especially film plastic. As FA1 neared its final elevation, windblown litter continued to be a problem due to the exposure of the landfill's active

face to wind. That problem increased through 2019, despite the move to FA2 at a lower elevation. Although the ALRRF's litter collection crew has been able to repeatedly remove litter from large expanses of the ALRRF property, high-wind events in 2019 and 2020 quickly replenished windblown litter in those areas, requiring repeated cleanups. In 2021, the landfill experienced record wind speeds, exacerbating the existing windblown litter issue further around FA2. As a result, a section of the fencing was knocked down and windblown litter covered large expanses of the ALRRF property as well as neighboring properties, including Bethany Reservoir. The landfill has added additional staff dedicated to litter cleanup, has repaired and increased the perimeter fencing downwind of FA2, and is communicating frequently with CalRecycle and the LEA to provide updates on removal of the windblown litter. In 2022, the LEA and CVRWQCB issued violations for windblown litter, these violations were resolved, and additional litter fences were constructed. On January 5, 2023, the CVRWQCB issued a resolution letter to the Investigative Order R5-2021-00817, that required windblown litter cleanup reporting, indicating that WM reporting obligations under this Investigative Order were complete. The CM provides an updated table of the CVRWQCB requests in the quarterly packets, including the requirements outlined in the Cease-and-Desist Order (CDO) R5-2021-0020, AOCs and Violations from inspections, the expected completion timeline and progress that has been made on each item. During 2024, WM hired a third-party crew of approximately 50 people, who worked for a month clearing wind-blown litter throughout ALRRF, Back-40 and roadway areas to Bethanny Reservoir. Throughout the year, WM utilized a smaller crew of people, to focus on clearing wind-blown litter on site.

1.5 Overview of Operations, Regulations and Permits

1.5.1 Operational Functions and Requirements

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

- Wastes are covered to control litter, prevent fire, and prevent the spread of disease.
- Wastes are placed and compacted to be physically stable.
- Plant debris is not to be disposed; if received, it must be separated and reclaimed by composting or other methods. The CASP compost system adjacent to the landfill provides a convenient location for plant debris that is inadvertently delivered to the landfill.

- A liner and liquid recovery system is in place to prevent groundwater contamination by leachate.
- Landfill gas (LFG) is controlled by an extraction system. Emissions from combustion and processing (diesel engines and landfill gas systems) are controlled to meet Bay Area Air Quality Management District (BAAQMD) standards.
- Other air pollutants and nuisances (dust, odor, litter, etc.) are prevented.
- Stormwater erosion is controlled, and stormwater runoff is tested for pollutants.

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

- Stockpiling and processing materials for beneficial use on site, such as using demolished concrete for wet-weather roads and access pads;
- Blending liquids with dry materials in a solidification process to make a product that can be landfilled or used as cover;
- Using contaminated soils and other wastes (biosolids, shredded tires, MRF fines, treated auto shredder fluff, etc.) for cover material, as permitted;
- Stockpiling construction and demolition (C&D) materials and scrap metal for processing elsewhere;
- Providing an area for the separation of plant debris from other wastes, to avoid landfilling plant debris; and
- Hosting site visits, by prior arrangement, for public education.

The ALRRF property covers more than three square miles. Within that area, the portion that is delineated as landfill is divided into FA1 and FA2. FA1 covers approximately 235 acres, including an Asbestos-Containing Waste landfill operation which occupies several acres within the FA1 footprint. The FA2 footprint is approximately 250 acres. Although refuse and cover material are currently being delivered to FA2, FA1 has not closed, and it will likely receive additional refuse to reach its permitted final elevation. It is currently the site of the active asbestos landfill and two solidification basins. The process to relocate the solidification basins to FA2 began in 2024. In 2025, construction of the FA2 solidification basins began and will continue into 2026.

Lands surrounding FA1 and FA2 are mainly grazing land and some construction-support activities related to the continuing construction of FA2, which will take place in phases over several years. These surrounding lands include a Conservation Plan Area, protected with a permanent easement that provides suitable habitat for several special status species.

Much of the work done by the CM involves the review of data and reports required of the ALRRF by regulatory and permitting agencies, as described below.

1.5.1.1 Water

In California, the State Water Resources Control Board (SWRCB) and its Regional Water Quality Control Boards (RWQCBs) protect groundwater and surface water resources through laws, regulations and permit requirements. Because most of the ALRRF property drains into the Central Valley, the CVRWQCB issues and administers the WDRs for the site. These WDRs set various operating requirements, and they also define the programs that monitor water quality by periodically testing groundwater wells as well as storm water basin contents and discharges. The CVRWQCB also requires the ALRRF to address incidents that increase risk to groundwater, such as the inadvertent receipt of wastes that contain unpermitted levels of hazardous materials. The CM reviews semiannual groundwater monitoring reports, the stormwater pollution prevention plan, annual stormwater monitoring reports, and the annual Winterization Plan update, as well as correspondence and required reports that the CVRWQCB posts on its GeoTracker web site[6].

1.5.1.2 Air

The BAAQMD administers its own regulations, including Regulation 8 Rule 34 regarding landfill gas control, as well as relevant State and Federal regulations. At the Federal level these are referred to as Title V requirements. The operation of (and especially the air emissions from) the landfill gas control systems, various diesel engines, and other processes that produce air emissions are regulated through permit requirements. Every six months the ALRRF submits a comprehensive "Title V report" to the BAAQMD. This report summarizes emission test results and landfill gas control system performance as required. The CM reviews these reports as they are issued. The landfill also produces an annual estimate of greenhouse gas (GHG) emissions, as required by Federal regulations. The most recent data available, for 2024, indicate that the ALRRF is the third highest GHG-emitting landfill in California, with 37,431 metric tons of total carbon dioxide ("greenhouse gas as carbon dioxide equivalent") emitted, behind the Kiefer Landfill in

6 ALRRF's profile can be accessed through: https://geotracker.waterboards.ca.gov/profile_report?global_id=L10005834311

Sacramento County (99,788) metric tons of total carbon dioxide emitted and the Puente Hills Landfill in Los Angeles County (101,668) metric tons of carbon dioxide emitted).[7]

1.5.1.3 Disposed Wastes

Two agencies regulate solid waste disposal in Alameda County. At the county level, the LEA, and at the State level, CalRecycle which supports and oversees the LEA. The LEA is the main enforcement agency for the Solid Waste Facility Permit (SWFP) that governs many aspects of operations at the ALRRF, such as operating hours, landfill cover materials and cover frequency, types of materials that are allowed to be disposed, etc. The SWFP is reviewed and updated every five years, and the CMC and CM closely follow that process, as required by the Settlement Agreement. The CM also reviews ALRRF inspection reports made by the LEA, as those reports become publicly available; and each year at least four of the monthly CM site inspections are done in conjunction with the LEA, as required in the CM's Scope of Work. The CM conducted 12 site visits in 2025 as required by the scope of work. Section 2.1 provides more details. Two of the 12 CM site visits in 2025 were performed with the LEA. The CM also reviews the LEA's monthly inspection reports which are publicly available on the CalRecycle web site[8].

1.5.1.4 Land Use

Concurrently with the Settlement Agreement, Land Use Permit C-5512 for the ALRRF site was updated to incorporate mitigations specified by the Settlement Agreement. These modifications include restrictions on waste quantities, limits on truck traffic, and other operational constraints, as well as certain biological resource protection measures discussed in Section 1.5.2 below. The CM tracks compliance through site visits, review of data from ALRRF operations, and review of periodic reports submitted to regulatory agencies by the ALRRF, including the annual Mitigation Monitoring Report submitted to County Planning. Annual monitoring surveys of the on-site Conservation Plan Area are also reviewed by the CM.

An additional Land Use Permit (PLN 2010-00041) was approved by Alameda County in March of 2013 for the future development and use of composting and material recovery operations at the ALRRF. In April 2018, the ALRRF began operation of its CASP compost facility northeast of FA1. Currently, Waste Management's position is that the CASP facility is not within the purview of the CMC. However, the CMC has taken the position that the additional permit is within its purview.

7 Air Resources Board file https://ww2.arb.ca.gov/mrr-data, accessed December 10, 2025.

8 ALRRF CalRecycle profile can be accessed through: https://www2.calrecycle.ca.gov/SolidWaste/Site/Summary/7.

1.5.1.5 Waste Diversion Requirements

At the local level, the Alameda County Waste Management Authority and the Alameda County Source Reduction and Recycling Board formed StopWaste as a joint powers agency to pursue local and state waste reduction and diversion goals. StopWaste has implemented mandatory separation of recyclables and compostables at businesses and multifamily properties throughout the county, and it provides public education, training and other assistance. In addition, StopWaste has developed, and all of its member agencies have adopted, a single-use bag ban ordinance; and StopWaste has adopted a countywide ban on the disposal of plant debris in local landfills.

Section 1.3 of this Annual Report describes recent State legislation that requires increased solid waste diversion (or reduction) and more comprehensive reporting of disposed and diverted quantities.

1.5.2 Requirements for FA2 Development and Use

1.5.2.1 Background

In 2011, the last major permits for the development of FA2 were obtained after agreement was reached between regulatory agencies and WMAC regarding mitigation for the loss of a wetland channel and the loss of habitat for special status species. Mitigations were established through Alameda County Conditional Use Permit C-5512 and permits from several State and Federal agencies:

- US Army Corps of Engineers, which had jurisdiction over wetlands;
- US Fish and Wildlife Service (USFWS), which consulted on wildlife protective measures;
- CVRWQCB, which certified that the mitigations would protect water quality; and
- California Department of Fish and Wildlife (CDFW), which concurred with the USFWS' Biological Opinion and placed specific conditions on work in the wetland channel.

The fundamental requirements of these permits are:

- The dedication of 750 acres of ALRRF land as a Conservation Easement, in perpetuity;
- The creation of additional wetlands, in the form of a new pond between FA2 and the Eastern Alkali Wetland; and
- The enhancement of a riparian channel approximately the same size as the channel to be displaced by FA2.

To guide these efforts and many related requirements, the ALRRF and its consultants prepared the following documents:

- Conservation Management Plan,
- Pest Management Plan,
- Grazing Plan, and
- Waters and Wetlands Mitigation Plan.

The ALRRF dedicated the 991.6-acre Conservation Easement in 2012 and built the mitigation wetland pond in 2013. In late 2017, the ALRRF executed an agreement with the Cosumnes Floodplain Mitigation Bank to fund river channel restoration and preservation in southern Sacramento County. The current status of these efforts is described in Section 1.5.2.3 below.

1.5.2.2 Corridors and Connectivity

The Biological Opinion from the USFWS describes the need for wildlife connectivity and wildlife corridors in eastern Alameda County to provide for wildlife movement and thereby enhance species health by preventing inbreeding. The Biological Opinion states that this need exists for three of the four protected species in the area: San Joaquin Kit Fox, California Red-Legged Frog, and California Tiger Salamander. The fourth federally threatened species is the valley elderberry longhorn beetle. ALRRF has no direct or indirect adverse effects toward this species. The ALRRF's Conservation Management Plan contains the following requirements in the Minimization and Mitigation sections of the document:

> MIN-31 – The project proponent will contribute funding to conduct a research study of wildlife passage at local over- and under- crossings to determine if these conduits provide conductivity [sic] for wildlife through the Interstate 580 corridor. The study will entail the periodic placement of motion-activated camera station, track plates, and other approved sampling method. The project proponent will provide the Service and/or CDFW with as much as $50,000 to perform the study. With the approval of the Service and CDFW, the project proponent may contract the study to an approved third party.
>
> MIT-7 – The mitigation pond/wetland will be constructed in an upland area […] immediately upstream from the Eastern Alkali Wetland. […] This area provides suitable upland refugial habitat for tiger salamanders and suitable dispersal habitat for red-legged frogs to the Eastern Alkali Wetland and the Southern Alkali Wetland.

These requirements are also stated in the USFWS Biological Opinion, which in turn is referenced by the CDFW Consistency Determination.

1.5.2.3 Current Status

The wetland mitigation pond built in 2013 was damaged by sediment inflow due to unusually heavy rainfall in early 2014. To remedy this, ALRRF purchased off-site wetland channel mitigation credits from the Cosumnes Floodplain Mitigation Bank in southern Sacramento County and had the pond rebuilt and replanted in 2018. In late 2018 the very extensive sedimentation basin SB-H was constructed between the pond and Fill Area 2. In 2021 and 2022, the wetland mitigation pond was irrigated, shallow water was observed in the pond and vegetation grew. In the first quarter of 2023, winter storms caused large erosional damage to the SB-H culvert and waterway system at the mitigation pond. The event deposited sediment into the mitigation pond. The area has since been re-constructed. By the end of 2023, the mitigation pond had increased in water quantity. This carried into 2024 and through 2025, as the mitigation pond benefitted from an increased quantity of water, which was observed in the pond, as well as birds and amphibious life.

In 2025, the CM reviewed a summary report describing wetland and wildlife mitigation activities and issues. Wetland and wildlife mitigation activities continued in 2025 with monitoring of construction areas and wildlife protection measures (e.g., relocating sensitive species such as California Tiger Salamander, when encountered). In 2025, the CM received and reviewed the 2024 Annual Status Report by Kleinfelder that describes conservation activities.

The CM also reviews the ALRRF annual mitigation monitoring progress report, which briefly summarizes the status of compliance with each of the 106 conditions in Conditional Use Permit C-5512.

2.0 COMMUNITY MONITOR ACTIVITIES AND ISSUES

2.1 Introduction

Under the Settlement Agreement, the CM has three ongoing duties:

- Review reports, data and information that are required to be submitted by WMAC to regulatory agencies, or that provide information regarding the ALRRF's compliance with applicable environmental laws and regulations (Settlement Agreement Sections 5.7.1.-5.7.3);

- Conduct inspections of the ALRRF facility up to 12 times per year (Sections 5.7.7, 5.8); and

- Review the records of testing and acceptance of "Class 2 soils", i.e., soils known to come from a contaminated site (Section 5.7.9).

2.2 Monitoring of Improvements and Changes

Through report reviews and site visits, several new developments in ALRRF facilities and operations were monitored in 2025:

- On March 10, 2025, Waste Management presented the CVRWQCB with a 30-day notice regarding the destruction of MW-44A, MW-44B, MW-45A, MW45B, MW-45C, MW-46A, MW-48A, MW-48B and UGP-10 beginning April 7, 2025. The wells and gas probe are in the planned FA2 toe berm foundation and need to be destroyed for the continued construction of the landfill. The destruction of these wells and gas probes was approved by the CVRWQCB on February 9, 2024.

- On March 21, 2025, Waste Management submitted Fill Area 2, Partial Phase 8 and Ground Improvements Design Report, prepared by Geosyntec, to the CVRWQCB for approval. This report provides the design basis, plans, specifications, CQA plan and supporting documentation for improving the foundation soils below the FA2 toe berm and partial grading of the toe berm after ground improvements. Throughout 2025, Waste Management and the CVRWQCB have worked together to finalize specifications for this Design Report, specifically construction of the proposed alternative locations for the Toe Berm monitoring well and gas probe locations, described in said report. This Design Report has not been finalized.

- In the 12 months from June 2024 through May 2025, five poorly performing landfill gas wells were decommissioned, and zero new landfill gas extraction wells were brought online. Wells with higher-than-normal gas temperatures were monitored for possible subsurface combustion. A total of five existing wells were decommissioned, i.e., shut down and disconnected from the gas extraction system because they had become unproductive. During surface emission monitoring, there were 30 exceedances of the 500 parts per million by volume (ppmv) methane threshold total. All the corrective actions to block these emissions were successful and passed their 10-day and 30-day follow-up tests. Methane exceeding regulatory threshold of 5% was not found in any of the 50 perimeter probes installed around Fill Areas 1 and 2. Probe GP-20C and probe GP-8C, both have historically had higher methane values that have been proven to be naturally occurring and not related to landfill operations. One exceedance was detected in gas probe GP-20C during this monitoring event. The landfill gas wells nearest to groundwater

monitoring wells E-05/E-07, E-20B, and MW-4A continued to be operated. This was an effort to prevent landfill gas from reaching those groundwater wells, where low concentrations of VOCs have been detected. Currently the operating emission control devices for landfill gas at the ALRRF consist of two turbines (S-6 and S-7) and two flares (A-15 and A-16). The two turbines were tested for compliance with emission limits in December 2024, while the main flare, A-16, and the back-up flare, A-15, and were tested in February 2025. All four devices passed by the BAAQMD under Permits (8-34-301.4) and Condition Number (19235).

- The CVRWQCB staff reviewed the Final Report ET Cover Demonstration Project Report prepared by Geosyntec on behalf of Waste Management, dated August 13, 2024. The CVRWQCB staff's review of the information contained in the report and the results of the 2019-2023 ET Cover Demonstration Project appear to indicate that the ET Cover performed "at least as well as prescriptive final cover system constructed at ALRRF." The staff support a recommendation to the CVRWQCB that the ET Cover design be considered as an approved alternative final cover design for the ALRRF.

- The Mitigation Pond had water present during the site visit conducted in April of 2025. The water level observed in the deepwater portion of the pond appeared to meet the performance standard of three feet deep. Langan and ESA observed robust vegetation along the bank in this area. Significant patches on non-native species were observed surrounding the pond. Langan and ESA also observed minor erosion at the downslope of the riprap surrounding the restored southern outfall area.

- The windblown litter issue remained similar to 2024 during 2025. The LEA issued an NOV on June 3, 2025, as litter was observed outside of the active face of the landfill, around the Back-40 and along the slopes of the eastern adjacent property. WM worked to clean up the litter and by July, the NOV was downgraded to an AOC. In August the AOC was removed.

- In the period from January through November 2025, the ratio of Class 2 cover soil to municipal solid waste increased to 23% from 22% in 2024.

2.3 Compliance and Significant Incidents

As noted above, the Settlement Agreement defines the CM's Scope of Work to include "issuing a written report each year summarizing the ALRRF's compliance record for the period since the last such report with respect to all applicable environmental laws and regulations." This Annual

Report provides that summary. The regulatory agencies that administer these laws and regulations, and the environmental permits held by the ALRRF, include the following:

- Alameda County Planning Department
- Alameda County Department of Environmental Health
- Bay Area Air Quality Management District
- US Environmental Protection Agency
- California Department of Resources Recycling and Recovery
- Central Valley Regional Water Quality Control Board
- California Department of Fish and Wildlife
- US Army Corps of Engineers
- US Fish and Wildlife Service

To determine if there are trends in the compliance record, a list of compliance issues has been compiled; issues from 2019-2025 are shown in Table 2-1, below. Persistent issues appear in the upper part of the table, followed by infrequent or one-time issues. Past issues from 2011–2018 are shown in the 2018 Annual Report.

To compile this table, the CM reviewed publicly available data from the regulatory agencies listed above, ALRRF correspondence with those agencies, and the CM's monthly site inspection reports. The severity of the issues was rated subjectively by the CM using the 1 to 5 scale shown below Table 2-1. Issues that were judged to be beyond the control of the ALRRF are not included in the annual total of severity scores but are listed below the total line.

Table 2-1

Compliance Issues Ranked by Severity

Issue	2019	2020	2021	2022	2023	2024	2025
Contamination at E-05, E-07, E-20B	2	2	2	2	2	2	2
Stormwater contamination	3	2	2	1	1	1	1
Windblown Litter	4	3	5	4	3	3	4
Birds	2	2	2	2	2	1	1
Erosion	3	2	2	1	2	2	3
Cover thin / absent	1	1	1	2	-	5	2
Worker injury	1	1	-	-	-	-	-
Condensate/Leachate Leakage	3	2	2	2	2	3	3
Ponding in low-lying area of landfill	2	2	2	1	1	5	2
Sediment in Wetland Mitigation Area	-	-	-	-	2	1	2
Odor, on site	1	-	-	-	-	-	-
Leachate Seeps	4	2	2	1	1	1	3
Erosion control (sitewide)	3	2	1	1	2	1	3
Waste outside active area (trash, pallets)	-	-	-	-	2	2	3
Leachate Leak Disposal	-	-	-	3	-	-	-
Contaminants at monitoring well MW-4A	-	-	3	2	1	1	2
Contaminants at monitoring well MW-38	-	-	-	2	1	1	1
Windblown litter beyond last litter fence	2	2	5	3	3	3	4
Disposal of liquid into pond without prior approval	5	2	-	-	-	-	-
Lack of means to record liquid level in ponds [cleared]	-	-	-	1	-	-	-
Failure to monitor landfill gas well	-	-	-	-	-	-	-
Incomplete groundwater monitoring report	-	-	-	-	-	-	-
Liquid separation not implemented, Fill Area 1	4	-	-	-	-	-	-
Medical waste (sharps) manifest issue	-	2	-	-	-	-	-
Totals	**40**	**27**	**29**	**28**	**25**	**32**	**36**
Issues Beyond Control of / Refuted by ALRRF							
Truck overturn	2	2	2	2	1	2	2
Methane Gas at Perimeter Probe(s) [cleared]	4	4	-	-	-	-	-
Fire in refuse &/or stored material	3	3	3	-	-	1	-
Fire on ALRRF property, outside active areas	3	2	-	1	-	1	-
Positive COVID case	-	-	1	1	-	-	-

Indicates that a violation was issued by a regulatory agency.

Severity Criteria

1: Minor or ongoing issue having little potential to harm environmental or public health; below regulatory thresholds.
2: Issue having some potential to harm environmental or public health; below regulatory thresholds; being addressed.
3: Issue having potential to harm environmental or public health; below regulatory thresholds; not improving, or new.
4: Issue having significant potential to harm environmental or public health or resulting in a violation being issued.
5: Issue having significant potential to harm environmental or public health; violation issued; willful non-compliance.
-: Not applicable/not evaluated

For the purposes of this report and table, incidents involving the delivery of hazardous materials with incorrect profiles (showing them as non-hazardous) are considered to be beyond ALRRF's control; but the CVRWQCB's position appears to be that ALRRF is responsible, nevertheless.

The total severity score for 2025 is higher compared to 2024, due to multiple areas of concern and violations issued by the LEA and CVRWQCB.

2.3.1 Compliance Issues Documented by the LEA

In 2025, two Notice of Violations (NOV) and one Area of Concern (AOC) notice were issued by the LEA. LEA inspection reports indicate concerns about the following:

- **Hazardous Wastes**
    - On May 14, 2025, the LEA received notice of an NOV of WDR Order R5-2016-0042-01 and amending order R5-2017-0026 issued by the CVRWQCB. The operator, Waste Management, notified the CVRWQCB of a possible disposal of non-RCRA Hazardous Waste at ALRRF. The operator self-reported disposal of Hazardous Waste sludge into FA 2.
- **Windblown Litter:**
    - On June 3, 2025, the LEA issued an NOV regarding windblown litter observed on site during an inspection. The LEA observed significant amounts of litter accumulated onsite north/northeast of the current active phase. Additionally, a section of the wind fence had been torn with heavy accumulations of litter beyond the tear heading in the direction of the Back-40. Minimal litter accumulation was observed on the slopes of the Back-40; however, more significant accumulations of litter were observed on the perimeter fencing along the east boundary of site and additional offsite litter was observed east of the property boundary.
    - On August 19, 2025, the LEA reduced a previous NOV regarding migration of windblown litter observed during a June 3, 2025, inspection. The LEA observed no offsite migration of windblown litter during the inspection, however, the LEA observed significant amounts of onsite windblown litter accumulated onsite north/northeast of the active phase and the southeastern slopes of the Back-40.

2.3.2 CVRWQCB Violations and Concerns

2.3.2.1 2025 Violations

During 2025, there were two violations issued by the CVRWQCB.

NOV – May 14, 2025

In a letter dated May 14, 2025, the CVRWQCB issued a NOV for the discharge of hazardous waste in violation of WDR requirements.

In an April 22, 2025, email, Waste Management notified the CVRWQCB staff of the possible disposal of non-RCRA hazardous waste at ALRRF. The waste originated from a PG&E power pole replacement project occurring adjacent to the Potrero MGP Northern Switchyard in San Francisco. Instead of placing onsite spoils in the bin provided for the project, the hydrovac conductor (Discovery Hydro) transported the wet spoils to the PG&E Oakport spoils yard and dumped approximately 200-gallons of untested wet spoils into a non-hazardous wet spoils bin on March 11, 2025. Once in the spoils yard, excess free liquid was decanted, and the remaining sludge was sent to Altamont Landfill.

In response, the CVRWQCB issued the following requirements for the landfill:

1. Immediately isolate, remove and properly contain hazardous waste, and arrange for its disposal at a permitted facility authorized to accept hazardous waste.
2. Submit a report documenting the offsite disposal of hazardous waste at a permitted facility authorized to accept hazardous waste by July 31, 2025.

Resolution of the May 14, 2025, NOV by WM is ongoing with correspondence with the CVRWQCB.

NOV – May 27, 2025

The CVRWQCB issued an NOV for discharging in violation of the WDR. On May 13, 2025, the CVRWQCB staff conducted an inspection at ALRRF. A violation was issued regarding "windblown waste outside of a unit or portions of a unit specifically designed for their containment." The CVRWQCB noted that although the volume of windblown waste observed across the ALRRF was significantly less than what had been observed during previous inspection, a significant volume of windblown waste was observed along and beyond the completed eastern downslope, lined extent of FA 2, Phase 6.

In response, the CVRWQCB issued the following requirements for the landfill:

1. Immediately implement procedures to prevent future discharges of waste outside the completed, lined extent of FA 2; and by July 20, 2025, submit a report with photographic evidence demonstrating that all waste documented in the inspection report observed outside of the completed, lined limit of FA2 has been removed and properly disposed of.

2. Identified 11 Areas of Concern regarding their facility inspection. See details in section 2.3.2.2 below.

WM has resolved the May 27, 2025, NOV and associated AOCs.

2.3.2.2 2025 Areas of Concern

On May 27, 2025, the CVRWQCB issued a letter issuing an NOV following the May 13, 2025, inspection at ALRRF, regarding the discharge of windblown litter outside of the active face of the landfill. Apart from the NOV, 11 AOCs were issued as follows:

1. Two leachate-stained soil seeps were observed along the southern face of LF-1/Unit-1 in the area of Seep C.

2. Leachate-stained soil and some liquid was visible beneath the Seep B and Seep C leachate collection tanks.

3. CVRWQCB observed truck potentially emptying load in a location that would have been outside the discharge limits of the Yellow Flag Basin.

4. A low area of possible settlement was observed atop FA 1, just east of the J-stand, which could lead to significant ponding.

5. A single area of leachate-stained soil was observed atop FA 1 just southwest of the J-stand.

6. A couple areas of notable erosion were observed atop FA 1.

7. Tire ruts and ponding were observed atop FA 1 adjacent to the TASW stockpile.

8. A few areas of exposed waste, without adequate daily/intermediate cover were observed atop FA 1.

9. Erosion or settlement occurred beneath the well apron for GP-24. Assess the condition of GP-24 and submit a report that contains a proposal to repair the well.

10. Well MW-10 has been damaged and will need to be repaired or possibly replaced. Assess the condition of MW-10 and submit a report that contains a proposal to repair the well.

11. A large stockpile of soil has been temporarily placed within SB-H.

WM has resolved the AOCs.

2.3.2.3 CDO

The CVRWQCB issued CDO R5-2021-001 for the ALRRF on April 22, 2021. In the CDO, the CVRWQCB alleged the ALRRF was being operated outside of applicable federal and state regulations, and the WDRs. The CDO provided a list of various items the Discharger (ALRRF) performed out of compliance and provided a time schedule with specific requirements to that compelled the Discharger to resolve past compliance issues, achieve compliance with Title 27 and the WDRs, and conformed to its Notice of Applicability (NOA) in a time frame acceptable to the CVRWQCB. The items identified were not new and had been discussed during the past years with the CM, but the CDO raised the severity of the issues. Between 2021 and 2025, WMAC has resolved most of the issues raised by the CDO as reported below.

Requirements Outlined in the CDO include the following:

<u>Implementation of FA2 Unit 1 Detection Monitoring Program</u>

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 actions were requested to resolve this item:

- Installation of interim point of compliance (POC) wells in FA2 Unit 1, which will continue while FA2 is being expanded;
- Installation of final permanent FA2 limit wells, which has been completed; and
- Implementation of a Water Quality Monitoring and Response Program for FA2 Unit 1.

<u>MW-4A Evaluation Monitoring Program</u>

In May 2017, MW-4A, located in the northeastern limit of FA1, reported exceedances of bicarbonate, calcium and five 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.

Continued implementation of the FA1 Corrective Action Program

The Discharger has chosen landfill gas extraction as the corrective action measure to address landfill gas effects. The CDO requires continued implementation of the Corrective Action Program, and to submit the following:

Report outlining the Corrective Action Program (landfill gas extraction). Starting with the Second Semiannual 2021 groundwater sampling event, a Corrective Action Status Reports have been submitted to the CVRWQCB to document the effectiveness of the Corrective Action Program.

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.

On October 19, 2021, in accordance with the CDO, Golder Associates Inc. (Golder) prepared the Report of Waste Discharge (ROWD) for the proposed concrete-lined, Solidification Basins that will be re-located near Fill Area 2 (FA2) at the ALRRF. The basins will be constructed as Class 2 liquid waste management units and will be underlain by a geomembrane liner to provide a double containment system with a leachate collection and recirculation system (LCRS). A pan lysimeter will be constructed underneath the sump. On November 8, 2022, a monitoring plan for the solidification basins was prepared by Geosyntec. On August 29, 2023, the CVRWQCB issued tentative Waste Discharge Requirements (WDRs) and monitoring program for the proposed Solidification Facility. WM provided comments, and the CVRWCB responded to the comments on November 29, 2023. A public hearing was scheduled for December 14/15, 2023.Once all the permitting is approved by the CVRWQCB, the construction of the new solidification basins can be completed. During 2024, permitting by the CVRWQCB was issued to the landfill to perform grading of the new solidification area basin. In 2025, construction of the FA 2 solidification basins continued with oversight from the CVRWQCB and is scheduled to be completed in 2026.

Water Board Tracking Timeline

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

- 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.
- 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.
- 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 Progress reports to be submitted semi-annually by 1 August and 1 February each year.
- 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), 2024.

The majority of the tasks listed in the CDO have been completed on or before the due date included in the CDO. However, some items have not been completed; this issue will continue to be tracked. The CM presents a table that lists updates of the requirements outlined in the CDO, the expected completion timeline and progress that has been made on each item on each quarterly packet.

2.3.2.4 Other Concerns

Several open issues had arisen between the ALRRF and the CVRWQCB since the current WDRs were finalized in July 2016. Most of these issues were included in the CDO issued by the CVRWQCB in 2021 and described in section 2.3.2.3.

2.3.3 Other Incidents

The following information is based on reports filed in the site's Special Occurrences Log and on Community Monitor site inspections.

2.3.3.1 Vehicular Incidents

Within the ALRRF operating area, five dump-trucks overturned during 2025. No injuries were reported.

2.3.3.2 Fire

No fires occurred on site in 2025.

2.4 Review of Reports

2.4.1 Groundwater

Two groundwater monitoring reports were reviewed in 2025. The first covered the period from July through December of 2024; the second covered January through June of 2025.

The data in these reports indicate that most monitoring wells with VOC contamination are still fluctuating. In the Second Semiannual 2024 sampling event, it appears VOCs are decreasing over time, including VOCs previously detected in E-05R at high concentrations. In the First Semiannual 2025 sampling event, it appears that VOCs are continuing to decrease over time. These trends will continue to be tracked.

Reoccurring statistical exceedances of concentrations of inorganic constituents (chemical oxygen demand, dissolved calcium, chloride, sulfate and total dissolved solids) continued through 2025. This appeared in MW-2, MW-8A, MW-8B, MW-10, MW-18, MW-62 and PC-2A as reported in both semiannual reports. MW-8A, MW-8B and PC-2A are a part of a group of wells that have experienced changes in inorganic groundwater chemistry starting as early as 2018. An evaluation of potential sources of water quality changes was conducted for these wells, which determined the changes were due to storm water effects and not release from the landfill (Geosyntec, 2020). WMAC has continued to report water quality data for all three wells in accordance with the 2016 WDR/MRP.

VOCs detected in corrective action monitoring wells E-05, and E-07, were generally consistent and within the ranges of previous detections observed at these wells. E20-B had a decrease in detected concentrations than previous detections observed in the well. No VOCs were detected in E-03A, E-21, or E-23 located downgradient of E-05 and E-07. None of the VOCs that have historically or currently been detected in E-20B were detected in downgradient monitoring well MW-27 during this, or any previous, reporting period. LFG-related VOCs continue to be detected in POC monitoring well MW-38. On February 15, 2022, the CVRWQCB indicated that the monitoring of water quality in the MW-38 area (including newly installed downgradient well MW-53) should be included in the CDO status report for corrective action areas. The amended AROWD that combined the corrective action areas on the eastern side of FA1 into one Corrective Action Program was submitted on March 20, 2023. No VOCs were detected at MW-4A. The concentrations of bicarbonate alkalinity at MW-4A have fluctuated from slightly below to slightly above the statistical concentration limit.

5-Year Contaminants of Concern

During the First Semiannual 2025 groundwater monitoring event at Fill Area 1, no SVOCs, organochlorine pesticides, chlorophenoxy herbicides, organophosphorus pesticides, or PCBs were detected. Sulfide was found below the reporting limit in one sample, while no cyanide was detected. Several metals were detected, but only antimony, arsenic, barium, iron, manganese, nickel, and selenium were above the reporting limit, all of which are naturally occurring. Arsenic, iron, and mercury detections in method blanks suggest possible lab contamination. Arsenic levels exceeded California's primary MCLs in two wells, while iron and manganese exceeded secondary MCLs in several wells, consistent with historical data. No further actions are required, and the next 5-Year COC event will occur in 2030.

During the First Semiannual 2025 groundwater monitoring event at Fill Area 2, no significant detections of SVOCs, organochlorine pesticides, chlorophenoxy herbicides, organophosphorus pesticides, or PCBs were found, except for below reporting limit (RL) concentrations of fluoranthene in MW-62 and endosulfan I in MW-49BR and MW-51. No sulfide or cyanide was detected. For 5-Year COC dissolved metals, several were detected, but only aluminum, arsenic, barium, chromium, copper, iron, manganese, nickel, selenium, and vanadium were above the RL. Arsenic, iron, and mercury detected in method blanks suggest possible lab contamination. Aluminum and arsenic levels exceeded California's primary MCLs in some wells, consistent with historical data. Iron and manganese levels exceeded secondary MCLs in several wells. No further actions are needed, and the next 5-Year COC event will occur in 2030.

2.4.2 Storm Water

During the Second Semiannual 2024 report sampling, no VOCs were detected in sedimentation basin samples from InBasinA or InSB-F. InBasinC sample had a reoccurring below RL concentration of 4-methyl-2-pentanone (1.1 micrograms per liter). The InSB-E sample had a below RL detection of styrene. No other VOCs were detected in InBasinC or InSB-E. Although styrene has not been previously detected in samples from InSB-E, similar concentrations have been observed in past samples from other surface water monitoring points and in blank samples. Per the WDR, a single detection below the RL VOC is not considered an initial indication of the presence of VOCs, and no further action is required.

During the First Semiannual 2025 report sampling, no VOCs were detected in sedimentation basin samples from InBasinA, InSB-F, nor InSB-H. The InBasinC sample had a recurring concentration of acetone, 2-butanone, carbon disulfide and toluene. The InSB-E sample had

reoccurring concentrations of acetone and toluene. No other VOCs were detected in InBasinC or InSB-E.

ALRRF conducted a study on potential sources for these VOCs, and it has not identified any industrial sources at the site for the 2024 Second Semiannual nor 2025 First Semiannual reporting.

2.4.3 Air Quality

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

In 2025, the CM received the Title V reports for the periods June – November 2024, and December 2024 – May 2025. These reports describe landfill gas control operations and source testing, and they also document new or unique developments at the site that can have an effect on air emissions. Results from the current reporting year are similar to those from the previous year:

- The required surface emissions monitoring (checking for methane leaks through the landfill cap) continued to occur, and although exceedances of methane were found, they were typically remedied on the first try, without the need for repeated repairs.
- From June 2024 – November 2024, 4 landfill gas wells were decommissioned, and no new wells were installed.
- From December 2024 – May 2025, 1 landfill gas well was decommissioned, and no new wells were installed.
- The operating emission control devices for landfill gas at the ALRRF consist of two turbines (S-6 and S-7) and two flares (A-15 and A-16). For both monitoring periods, the two turbines and two flares were tested for compliance with emission limits All four devices passed by the BAAQMD Permit 8-34-301.4 and Condition Number 19235.
- Throughout both monitoring periods, the 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. This was an effort to prevent landfill gas from reaching those groundwater wells, where low concentrations of VOCs have been detected.

2.4.4 Mitigation Monitoring

The Mitigation Monitoring and Reporting Program Annual Progress Report, covering calendar year 2024, was reviewed by the CM during the second quarter of 2025. It is a table that lists each of the conditions described in the current Conditional Use Permit (CUP-5512), followed by a description of the implementation status of that condition or mitigation. The status descriptions together with the verification notes generally reflected the current status of each mitigation measure. Updates to this table from the previous year are listed below, with reference to the applicable CUP Condition number.

- Condition 4.4: The site received 13,781.12 tons of sludges, inert waste, and special waste in 2024, staying below the 25,000 tons/calendar year limit. ALRRF inadvertently accepted 4 loads of waste that originated outside of the Nine Bay Area Counties. ALRRF has addressed this oversight by reviewing its internal procedures for accepting waste and by conducting additional training for sales department and scale house personnel.

- Condition 26: Post-construction reports for Phase 7 and Sediment Basin H modifications post-construction along with prior post constructions will be submitted in 2025.

- Condition 47: No seeps were encountered during excavation and construction of Phase 7 which was completed in 2024.

In addition to the Annual Progress Report described above, in prior years the ALRRF has prepared reports to inform the natural-resource agencies about progress on their permit requirements for Fill Area 2 expansion: establishing the Conservation Plan Area, constructing the wetland mitigation project, protecting existing wetlands and surface waters, etc. In 2025, Waste Management informed the CM that a report documenting the Conservation Plan Area progress was not deemed to be necessary by their biologist according to the Conservation Management Plan.

In 2024, the Final Report Evapotranspirative Report was prepared by Geosyntec and documents the demonstration of the performance cover through observations, maintenance, and data collection and analysis throughout the 4-year performance period of the Evapotranspirative Cover. Geosyntec noted that:

- Overall, the 10-acre ET Cover installed at ALRRF performed well over the demonstration period. Ground surface conditions, vegetation and storm water features all required minimal maintenance.

- No observed erosion, minimal cracking and no ponding. The cover experienced up to 12 feet of settlement during this period with no abrupt or adverse differential settlement with a slight increase in the drainage slope at the top deck.

- Through measurement values of soil water content, soil suction, PBA and root depths, a vertical flux was estimated and compared with that of a prescriptive cover. The vertical flux of the ET Cover is such that it will isolate the landfilled waste from precipitation water at least as well as the applicable prescriptive cover, satisfying the alternative cover requirement of Title 27, Section 21090(a).

- Monitoring and modeling for the demonstration period showed that the 4-foot ET cover system as designed and construction at ALRRF meets the overall performance goals of the project: isolate waste from the environment, minimize infiltration, promote healthy vegetation and reduce erosion.

In 2025, the CVRWQCB staff reviewed and recommended approval for the Final Report Evapotranspirative Report. The CVRWQCB supported a recommendation that the ET cover design be considered an approved alternative final cover design per Title 27.

2.5 Review of Records

Several types of site records were reviewed by the CM in 2025. The CM's scope of work requires the periodic review of files that contain lab analyses and other descriptions of Class 2 soils (considered non-hazardous) that are brought to the site for use as cover soil.

The Special Occurrences Log for the ALRRF was examined four times during the year and summarized for the Committee. The LEA's monthly inspection reports are publicly available on the CalRecycle web site and were checked by the CM every month, to note any new issues that may have been identified by the LEA.

2.5.1 Class 2 Soils

An ongoing CM task is the periodic review of files containing profiles (sample analyses) for Class 2 soils that are imported for use as cover soil in the Class 2 portion of the ALRRF. For efficiency, this is generally conducted two to three times per year, and it requires at least one full day for a qualified specialist to review each file to be sure that it is complete and within the regulatory limits for Class 2 materials. The review conducted in 2025 occurred throughout April of 2025, for Class 2 soils accepted in October 2024 through February 2025; and in November

2025, for Class 2 soils accepted through March 2025 through October 2025. WM has made the files available to the CM electronically via email correspondence and in-person at ALRRF.

A total of 74 profiles were reviewed in April of 2025, that corresponded to Class 2 soil accepted at the landfill between October 2024 through May 2025. A total of 132 profiles were reviewed in November of 2025, that corresponded to Class 2 soil accepted at the landfill between March 2025 and October 2025.

The CM did not find profiles out-of-compliance. However, in an April 22, 2025, email, Waste Management notified the CVRWQCB staff of the possible disposal of non-RCRA hazardous waste at ALRRF. Waste Management stated that "the waste originated from a PG&E power pole replacement project occurring adjacent to the Potrero MGP Northern Switchyard in San Francisco. Instead of placing onsite spoils in the bin provided for the project, the hydrovac conductor (Discovery Hydro) transported the wet spoils to the PG&E Oakport spoils yard and dumped approximately 200-gallons of untested wet spoils into a non-hazardous wet spoils bin on March 11, 2025. Once at the spoils yard, excess free liquid was decanted, and the remaining sludge was sent to Altamont Landfill."

2.5.2 Special Occurrences Log

Each permitted solid waste disposal site in California must keep a Log of Special Occurrences to document unusual and potentially disruptive incidents, including fires, injury and property damage, accidents, explosions, receipt or rejection of prohibited wastes, lack of sufficient number of personnel, flooding, earthquake damage and other unusual occurrences. The ALRRF log was either checked by the CM in person during site visits or requested via email. Five dump trucks overturned in 2025.

2.5.3 LEA Inspection Reports

In 2025, there was one AOC noted for large quantities of windblown litter within the property boundaries but outside the active face of the landfill operations. The LEA requested ALRRF to reduce the litter quantity on ALRRF property. The AOC issued August 19, 2025, has been removed.

2.6 Monthly Site Visits

Twelve site visits were held during 2025. The visit day and time were as shown in Table 2-2 below.

In general, satisfactory conditions were observed. Windblown litter presence was still a notable issue, however, minor problems generally were rectified prior to the next inspection. Details are available in the monthly site visit reports provided in CMC meeting packets. Distinct operations, such as the stockpiling and processing of specific materials, took place in well-defined areas. No instances of unpermitted activities were noted. There were no new problems seen regarding refuse placement, public safety or traffic management, whether on hours or off hours. Throughout these visits, staff and management were forthcoming regarding operating practices and current conditions.

Table 2-2
2025 Site Visit Summary

Date	Day of Week	Visit Time	Announced in Advance?	With LEA staff?
January 23	Thurs	10:00 AM	Yes	No
February 21	Fri	9:00 AM	Yes	No
March 19	Wed	9:00 AM	Yes	No
April 24	Thurs	10:00 AM	Yes	No
May 12	Mon	9:00 AM	No	Yes
June 20	Fri	9:00 AM	Yes	No
July 21	Mon	10:00 AM	Yes	No
August 27	Wed	11:00 AM	Yes	No
Sept 26	Fri	10:00 AM	Yes	No
October 24	Fri	10:00 AM	Yes	No
November 21	Fri	9:00 AM	Yes	No
December 2	Tues	9:00 AM	No	Yes

In 2025, observations by the CM focused on:

- The operations in FA 2;
- Maintenance of the mitigation pond;
- Next steps for Evapotranspirative Cover test area;
- Storm drainage and erosion control;
- Observation of issues of ongoing concern including management of windblown litter east of FA 2;
- Construction of FA 2 Phases 7 and 8;
- Decommission of Solidification Basins at FA1;

- Construction of Solidification Basins at FA 2; and
- Changes at the site that could harm the environment or public health.

No truck traffic counts were conducted in 2025, because ALRRF data on tonnage and traffic indicated that the traffic volume requirements of the Conditional Use Permit were being met.

2.7 Per- and Polyfluoroalkyl Substances (PFAS) Updates

The PFAS Order was given by the SWRCB as part of a statewide effort to obtain a preliminary understanding of PFAS compounds concentrations in groundwater and leachate at various landfills. The Order indicates this sampling is necessary to determine if PFAS compounds are present in and near waters that could be used for drinking water purposes. The SWRCB and RWQCBs will evaluate the data collected and use it to support of any regulatory action to be implemented.

To be representative, samples were collected in November 2019 from a background well, a downgradient well, and a composite leachate sampling location, where possible. PFAS compounds were reported at higher concentrations in groundwater monitoring wells in the previously affected assessment and corrective action areas (E-05, E-07, E-20B, and MW-20) than the background or the detection monitoring program (DMP) wells. The highest PFAS concentrations in groundwater were reported in corrective action wells E-05 and E-07, located immediately downgradient of the old permitted unlined portion of FA 1. Relative to corrective action wells E-05 and E-07, lower concentrations of PFAS compounds were reported in the E-20B corrective action area, situated adjacent to the old unlined FA 1.

No additional PFAS sampling is proposed or required at this time. The SWRCB is analyzing the compiled data in airports, landfills and drinking water supply systems to aid in the development of Public Health Goals in drinking water. The concentrations reported at the ALRRF were below the maximum concentrations for groundwater and leachate at other landfills covered by the PFAS Order, and within the middle of the concentration ranges.

In 2021-2022 the United States Environmental Protection Agency (EPA) made several announcements regarding its goals for investigating, regulating, and remediating PFAS in consumer products and across environmental media. This included Emergency Planning and Community Right-to-Know Act and Toxic Substances Control Act Regulation, Safe Drinking Water Act Regulation, Clean Water Act Regulation, plans to initiate the addition of PFOA, PFOS,

Perfluorobutane sulfonic acid (PFBS), and GenX[9] to the list of Resource Conservation and Recovery Act (RCRA) Hazardous Constituents, as well as clarify that constituents classified as RCRA hazardous wastes can be cleaned up through RCRA corrective action process.[10] Additionally, the California Environmental Protection Agency's Office of Environmental Health Hazard Assessment (OEHHA) announced the availability of a draft technical support document for proposed Public Health Goals (PHGs) for PFOA and PFOS in drinking water. The public comment period for the draft ended on October 28, 2021. The intended effect once PFAS regulation and guidance is finalized at the Federal and State level is to comprehensively regulate and remediate PFAS. More information on the progression of PFAS regulations throughout 2021-2022 are available in the 2022 Annual Report.

In 2023, the EPA announced proposed national primary drinking water maximum contaminant levels (MCLs) for six PFAS (PFOA and PFOS as individual contaminants, and four contaminants as a PFAS mixture). The proposed regulation would require public water systems to monitor, notify the public of the contaminant levels, and treat drinking water to reduce the levels of these PFAS if they exceed the proposed MCLs. California-specific MCLs for PFAS have not yet been established as of March 2023, and the proposed regulations do not require any actions until finalized, likely by the end of 2023. On May 4, 2023, the EPA generated tables that reflect changes in the toxicity and chemical specific parameters per regional screening levels hierarchies. The table compares the previous toxicity database to this new and current table. This update is in response to the Integrated Risk Information System (IRIS) which is a part of the risk assessment process in which hazard identification and dose-response assessment are applied to derive toxicity values.

On February 1, 2024, the Biden-Harris Administration announced new steps to protect communities from PFAS and other emerging chemicals of concern.[11] The EPA is proposing to modify the definition of hazardous waste as it applies to the cleanups permitted at hazardous waste facilities to ensure the EPA's regulations are clearly reflected and authorizes states authorities to require the cleanup of the full range of substances under the Resource Conservation and Recovery Act (RCRA). The EPA states that the proposed rules would "strengthen protections for communities and drinking water supplies located near the 1,740 permitted hazardous-waste facilities across the nation." This would include corrective action

9 GenX is the trademark name for a short-chain PFAS that is being marketed as a replacement for PFOA.

10 The National Law Review: EPA Makes PFAS Announcements, Issues PFAS Strategic Roadmap and Planned RCRA Hazardous Waste Designations https://www.natlawreview.com/article/epa-makes-pfas-announcements-issues-pfas-strategic-roadmap-and-planned-rcra, accessed November 2021.

11 https://www.epa.gov/newsreleases/biden-harris-administration-announces-new-steps-protect-communities-pfas-and-other

under RCRA, requiring facilities that treat, store, or dispose of hazardous waste to investigate and mitigate hazardous releases into soil, groundwater, surface water and air. The EPA will publish the proposals in the Federal Register.

Regarding corrective actions, known technologies for treating PFAS in water include granular activated carbon, ion exchange, and reverse osmosis[12]. Granular activated carbon and ion exchange resins remove chemicals by sorption (the chemical is attached to the media), which reduces concentrations of chemicals in the effluent water of the system. Reverse osmosis removes contaminants by pushing water through a semipermeable membrane, effluent water has less chemicals, and a portion of the water (rejected water or concentrate) is collected for disposal. PFAS do not degrade in the environment, and one of the few technologies that can potentially destroy PFAS is incineration.

On April 19, 2024, the EPA announced that it was designating two types of PFAS, PFOA and PFOS as Comprehensive Environmental Response Compensation and Liability Act (CERCLA) hazardous substances. EPA does not intend to pursue entities such as publicly owned/operated municipal solid waste landfills for PFAS under CERCLA.

On 8 July 2024, the EPA final rule designated two PFAS (PFOA and PFOS), including their salts and structural isomers - as hazardous substances under CERCLA became effective.

Current and proposed regulations have focused on drinking water. Future developments may include additional monitoring for landfill and other disposal facilities.

On September 17, 2025, the EPA released an announcement that the Department of Justice submitted a court filing on behalf of the EPA related to the designation of PFOA and PFOS as CERCLA hazardous substances[13]. The EPA notes that the CERCLA designation can impose costly requirements on entities who release hazardous substances to the environment, which can include "passive receivers" such as entities who receive PFAS in waste like a landfill. EPA goes on to note that they continue to collect information about how passive receivers are saddled with unknown liability and costs related to receipt of PFAS and how a possible solution is a statutory fix to protect passive receivers. EPA also intends to develop a CERCLA Framework Rule to "provide a uniform approach to guide future hazardous substance designations, including how

12 Interstate Technology and Regulatory Council (ITRC), 2022. Treatment Technologies – PFAS — Per- and Polyfluoroalkyl Substances. https://pfas-1.itrcweb.org/12-treatment-technologies/#12_1. Accessed on March 10, 2022.

13 https://www.epa.gov/newsreleases/trump-epa-announces-next-steps-regulatory-pfoa-and-pfos-cleanup-efforts-provides

the agency will consider the costs of proposed designations." EPA notes that costs to manufacturers, passive receivers, consumers, and the economy should be taken seriously during future designations.

On October 29, 2025, the State of California, under the authority of the Deputy Director of the State Water Board's Division of Drinking Water, issued revised notification and response levels for PFOA, PFOS, PFHxS and PFHxA.[14]

Notification and response levels are non-regulatory, health-based advisory levels established for contaminants in drinking water. Maximum contaminant levels for drinking water have not yet been established.

3.0 Looking Ahead: Anticipated Efforts and Issues

3.1 Introduction

At the end of 2025, an extended 3-year Community Monitor contract, beginning in 2023 with Langan providing CM services, assisted by ESA, ended. The 2026 contract year is the beginning of a new three-year Community Monitor contract, with Langan providing CM services assisted by ESA. The CM team will continue to perform report reviews, site inspections and Class 2 soils file reviews through 2028 with possible extension to 2031.

3.2 Issues to be Tracked in 2026

3.2.1 Ongoing Review

The following issues will continue to be monitored in the coming year:

- Concurrence of natural-resource agencies with off-site wetland mitigations;
- Groundwater monitoring methods and data quality;
- Groundwater quality, including the vadose zone below the landfill liners;
- Stormwater quality and management practices;
- Performance of the landfill gas system; decommissioning and installation of gas wells;
- ET cover test site next steps;

[14] New and Revised Drinking Water Notification and Response Levels for PFOA, PFOS, PFHxS, and PFHxA

- Compliance with the CDO;
- Reduction of windblown litter on and off ALRRF property; and
- Track new developments related to PFAS.

3.2.2 Site Assessments

All operations will continue to be observed, with close attention to the following areas.

3.2.2.1 Landfill Gas Control System

This system protects both air and groundwater quality, and it operates within a complex regulatory framework involving Federal permits, local permits, State regulations, and ALRRF CUP conditions. Physical changes to this system are likely to include the further addition of landfill gas extraction wells, decommissioning of wells that are no longer productive, and ongoing operation of turbines, flares, etc. In 2026, four topics will be of special interest:

- The effect of the gas system on the concentrations of contaminants in wells E-20B and MW-4A.
- Implementation of the corrective action program in the MW-38 area.
- Gas temperatures, particularly in the high-temperature cluster of wells in FA 1 Unit 2.
- Implementation of gas collection in FA 2

3.2.2.2 Stormwater Controls and Monitoring

Throughout the year, and especially during wet weather months, the CM will monitor conditions at all stormwater basins. The stormwater pollution controls – skimmers, flocculant addition, Filtrexx™ check dams, and additional discharge points appear to have reduced contamination, although sporadic VOCs have been detected.

3.2.2.3 Windblown Litter

This will likely continue to be an issue for FA 2 and downwind areas. ALRRF has installed additional fences and maintained an internal crew to perform litter clean up as prevention to litter disposal offsite during 2022 through 2025.

3.2.2.4 New Systems

The CM will directly observe, and review available performance data, for:

- The ET cover test area next steps,

- The wetland mitigation pond,
- Tipper and truck wash equipment in FA 2,
- The liquids separation system, and
- Relocation of the solidification operations.

In addition, monitoring reports on the Mitigation Wetland and the Conservation Plan Area, will be reviewed as they are provided.

3.2.2.5 Groundwater Contaminants and Groundwater Data

The CM team will continue to check concentrations of VOCs which show an increase. The team will also monitor data from wells E-20B, MW-4, MW-12, MW-20, MW-38 and any well that shows evidence of contamination. The quality of groundwater sampling and analyses, especially the occurrence of contaminants in quality-control samples and field samples, will also continue to be monitored.

3.2.3 Class 2 Soils File Review

As required by the Scope of Work, the CM will conduct this review at least twice during 2026.

3.2.4 Permit Requirements

As required by the Scope of Work, the CM will continue to review compliance with the Conditional Use Permit and other conditions.

3.2.4.1 Tonnage Limitations

Section 4 of the Settlement Agreement contains numerous restrictions on the types and source jurisdictions of wastes that can be brought to the ALRRF Specifically:

- The amounts of Sludges, Inert Waste and Special Waste from outside San Francisco and Alameda Counties is limited to 25,000 tons per year, and these materials may only originate within the nine Bay Area counties.
- Self-Hauled wastes (of all types) from Contra Costa County are limited to 25,000 tons per year.
- Materials brought for disposal may only originate from Alameda County, San Francisco, and San Ramon.

3.2.4.2 Natural Resource Protections and Reporting

The natural resource permits issued in connection with the ALRRF contain over 80 explicit permit conditions, too many to enumerate here. In the near term, the following monitoring and reporting conditions are especially significant for the CMC:

- Every four years after the start of construction of FA 2 (which began in 2015), the CDFW is to receive a status report on the required periodic surveys of the Conservation Plan Area. The wildlife surveys focus on Western Burrowing Owl, San Joaquin Kit Fox, California Red-legged Frog, and California Tiger Salamander.

- Annual wetland monitoring reports are required by the Lake and Streambed Alteration Agreement, which was issued by the CDFW, for the first five years of operation of the wetland mitigations, i.e. the constructed pond.

- Reconnaissance survey reports for the Conservation Plan Area are also required by the CDFW. These include baseline and periodic surveys for sensitive wildlife species (see list above), and annual rangeland and general reconnaissance surveys. These are due on January 15 of the calendar year following the survey.

We will continue to request progress reports in the future.