

ALRRF COMMUNITY MONITOR ANNUAL REPORT 2013

Prepared for
ALRRF Community Monitor Committee

January 21, 2014



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SECTION 1

Introduction

1.1 Settlement Agreement

In December 1999, a Settlement Agreement was reached among parties involved in a lawsuit regarding the proposed expansion of the Altamont Landfill and Resource Recovery Facility (ALRRF). The Settlement Agreement established the Community Monitor Committee (CMC) and a funding mechanism for a technical consultant, referred to as the Community Monitor (CM).

The Settlement Agreement defines the purview of the CMC and the CM. The CM's scope of work is further defined in a contract between the CM and the CMC. In broad terms, the CM is to review certain reports and information, as defined; monitor incoming traffic by conducting truck counts, as described in the Settlement Agreement; and inspect the ALRRF site no more than once a month. The Settlement Agreement describes the CM's Scope of Work to include "issuing a written report each year summarizing the ALRRF's compliance record for the period since the last such report with respect to all applicable environmental laws and regulations." This Annual Report provides that summary for 2013.

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

The City of Livermore provides staff and administrative support to the CMC, as well as management of the CM contract and space for CMC meetings. The City also acts as financial agent for the CMC, pursuant to a letter agreement dated July 6, 2004.

1.2 Prior Community Monitor Work

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

In mid 2007, the CMC selected the current CM team of Environmental Science Associates and Treadwell & Rollo. This team began work in February 2008. From 2008 through 2012, the team has carried out report reviews, Class 2 soil analysis file review, and site inspections as intended. In 2008, the primary issue of concern was the rate at which groundwater monitoring wells were purged during sampling. This was resolved satisfactorily. In 2009, the CM team took a close look at the methodology used by ALRRF and its consultants to track variations in groundwater quality. No issues or areas of concern arose as a result of this effort; the team was satisfied that the method conforms to regulatory requirements and is conservative. In 2010, landfill gas monitoring was a key issue: new perimeter probes were installed to comply with new regulations,

and one of those probes detected landfill gas at levels that exceeded regulatory limits. This was abated by installing several gas wells close to those probes. In 2011, fine material¹ from the Davis Street Material Recovery Facility (MRF), used as Alternative Daily Cover, was beginning to include some municipal solid waste materials, such as plastics from consumer goods. Two other topics that received continuing attention from the Community Monitor during 2012 and 2013 are windblown litter and seagull activity. These problems increased in 2012, and while the gull problem diminished in the summer of 2013, the litter problem increased as landfill activity in Fill Area 1 approached the maximum permitted elevation, with unusually high winds for extended periods in the latter part of 2013.

1.3 Regional Context

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

- The recession that began in 2008 now is abating, but increased economic activity has not had an obvious effect on disposal volumes at the ALRRF; the moving 12-month average quantity of refuse brought to the ALRRF remained virtually constant during 2013. It may be that ongoing efforts to reduce waste and increase recycling have offset any upward trend in disposal tonnages.
- There are no new landfill sites currently in development in the region. However, on a regional basis there appears to be adequate capacity for refuse disposal in the short to medium term, at least through the year 2035².
- Three recent efforts to increase disposal capacity for the region are in progress, but their outcome continues to be uncertain.
 - The City of San Francisco and its refuse collection service provider, Recology, are working to obtain permission for the rail haul of San Francisco wastes to Recology's Ostrom Road Landfill in Yuba County. A draft EIR for this activity is in preparation, and a final decision on this issue is expected in 2015.³
 - In December 2012, the proposed Potrero Hills Landfill expansion in Solano County was dealt a setback when a judge overruled the issuance of a key permit from the Bay Conservation and Development Commission. The landfill owners have appealed that decision, and the appeal has not yet been reviewed in court. Subsequently, in mid 2013, an obstacle to landfill expansion was removed by a Superior Court ruling that Solano County's 1984 Measure E could not limit the import of refuse to the landfill.
 - Redwood Landfill near Novato faced opposition to the adoption of the mitigated alternative in its Environmental Impact Report for its planned expansion. A court ruling has set aside the EIR and the associated solid waste facility permit. The County has appealed this decision, and while the appeal is in process the facility's permits remain in effect and it continues to operate.

¹ MRF fines: Fine material produced by waste sorting systems that recover materials from dry wastes and wastes self-hauled to the Davis Street Transfer Station.

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

³ The March 2013 Notice of Preparation for the Draft EIR for the Rail and Permit Amendment Project stated that 2015 is the likely time frame for the completion of environmental review.

1.4 Site-Specific Constraints and Opportunities

The Settlement Agreement added constraints on operations, by adding new conditions to the Use Permit for the ALRRF. Solid wastes from out-of-county sources are strictly limited to those covered by existing disposal agreements. During peak traffic hours, the number of refuse trucks entering the landfill is limited. Various conditions intended to protect natural resources on the ALRRF property were imposed. Also, the size of the future expansion area was limited to 40 million tons of capacity, with a footprint of approximately 250 acres. In addition to Use Permit conditions, the Settlement Agreement establishes the CMC and the CM role, as described above; and it establishes mitigation funding related to the landfill expansion.

The physical setting of the ALRRF site also presents certain constraints and opportunities. Hilly terrain and high winds require constant attention to windblown litter, especially film plastic bags and foam plastic packaging. In 2013, the windblown-litter problem worsened significantly due to many high-wind events and the increased exposure of the working face to wind as Fill Area 1 nears completion. However, the construction of Fill Area 2 began in the latter part of the year. The litter problem is expected to greatly diminish when Fill Area 2 begins to be used, because landfill activity will be taking place within canyons at lower elevations, rather than on hilltops.

1.5 Overview of Operations, Regulations and Permits

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

- Wastes are covered to control litter, prevent fire, and prevent the spread of disease.
- Wastes are placed and compacted to be physically stable.
- Plant debris is not to be disposed; if received, it must be separated and reclaimed by composting or other methods. Currently it is back-hauled to the Davis Street facility for processing and eventual use as compost or biomass fuel.
- A liner and liquid recovery system prevent groundwater contamination by leachate.
- Landfill gas is controlled by an extraction system.
- Emissions from energy systems (diesel engines and landfill gas systems) are controlled.
- Other air pollutants and nuisances (dust, odor, litter, etc.) are prevented.
- Stormwater erosion is controlled and stormwater runoff is tested for pollutants.

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

- using landfill gas to produce electricity and a liquid fuel (LNG);
- stockpiling and processing materials for beneficial use on site, such as using waste concrete for wet-weather roads and access pads;

- using contaminated soils and other wastes (biosolids, MRF fines, treated auto shredder fluff) as cover material, as permitted;
- stockpiling construction and demolition (C&D) materials for processing elsewhere;
- providing an area for the separation of plant debris from other wastes, to avoid landfilling plant debris; and
- hosting site visits, by prior arrangement, for public education.

The ALRRF property covers more than three square miles. Within that area, the portion that is delineated as landfill is divided into Fill Area 1 (currently active) and Fill Area 2 (currently being constructed). The active parts of Fill Area 1 cover approximately 211 acres.

Lands surrounding the active area are managed primarily as grazing land, with portions leased for wind energy. These surrounding lands also provide habitat for several special status species. The active area will be supplemented by the expansion area (Fill Area 2) in the near future. In 2010, the last major permits for the development of Fill Area 2 were obtained. Construction of Fill Area 2 began in 2013.

Also, design revisions in 2010 for the final contour of Fill Area 1 increased its capacity, further increasing the expected lifetime of Fill Area 1. At this time no further environmental review is expected to be necessary for disposal to begin in Fill Area 2; but if anticipated composting and material recovery processes are developed, those are likely to require environmental review for compliance with the California Environmental Quality Act.

Much of the work done by the Community Monitor involves the review of data and reports produced by, or required of, the ALRRF. This is largely driven by the requirements of regulatory and permitting agencies, as described below.

1.5.1 Water

In California, the State Water Resources Control Board and its Regional Water Quality Control Boards (RWQCB's) protect groundwater and surface water resources through laws, regulations and permit requirements. Because the ALRRF property drains into the Central Valley, it is the Central Valley RWQCB that issues the Waste Discharge Requirements for the site. These WDR's set various operating requirements and also define the programs that monitor water quality by periodically testing groundwater wells and storm water discharges. The RWQCB also works with staff at the ALRRF to address special problems that may arise, such as the proper disposition of wastes that may have been brought to the landfill without necessary testing for hazardous materials. The Community Monitor reviews semiannual groundwater monitoring reports, the annual stormwater monitoring report, and the annual Storm Water Pollution Prevention Plan update.

1.5.2 Air

The Bay Area Air Quality Management District (BAAQMD) administers its own regulations, specifically 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 produces a "Title V report" that summarizes

emission test results and system performance in great detail, as required. The Community Monitor reviews these reports as they are issued. The landfill also produces an annual estimate of greenhouse gas emissions, as required by Federal regulations.

1.5.3 Disposed Wastes

Working closely with the Alameda County Department of Environmental Health which is the Local Enforcement Agency (LEA), the California Department of Resources Recycling and Recovery (CalRecycle) enforces the Solid Waste Facility Permit (SWFP) that delimits 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 delineated in 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 conjunction with the LEA, as required in the CM's Scope of Work.

1.5.4 Land Use

Concurrently with the Settlement Agreement, Land Use Permit C-5512 for the ALRRF site was updated to incorporate various mitigations identified in 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 the next section of this report. The Community Monitor tracks compliance through a combination of direct inspection, review of data from ALRRF operations, and review of the annual Mitigation Monitoring Report submitted to County Planning by the ALRRF.

An additional Land Use Permit (PLN 2010-00041) was issued by Alameda County in 2013 for the future development and use of composting and material recovery operations at the ALRRF. Currently Waste Management's position is that this permit is not within the purview of the Community Monitor Committee, but the Committee is questioning this position.

1.5.5 Biological Resources

Several conditions in Use Permit C-5512 are intended to protect certain biological resources present on the ALRRF site. The broadest of these is Condition 16, which requires that 750 acres of landfill property be established and protected in perpetuity as a wildlife habitat mitigation and buffer area. This was accomplished in 2010, with the delineation of a conservation easement covering 991.6 acres. The easement was officially recorded in 2012. In addition, there are requirements for protection and monitoring of an existing alkali sink, and the creation and monitoring of several wetland areas. In 2013, the start of construction of Fill Area 2 entailed the exclusion of protected wildlife species (burrowing owls and certain other animals, if found) prior to excavation. Also, there may be additional requirements for monitoring and reporting by the ALRRF in connection with permitting from the US Fish and Wildlife Service, Army Corps of Engineers, and California Department of Fish and Wildlife, to mitigate the effects of developing Fill Area 2.

1.5.6 Local Requirements: Stopwaste.Org

The Alameda County Waste Management Authority and Recycling Board (Stopwaste.Org) waste diversion goal is continuing to be pursued, most recently through the implementation of mandatory recycling at commercial businesses and a forthcoming requirement for commercial source separation of compostable materials in many Alameda County cities. These requirements are implemented at the local level by agencies' opting into (or out of) the ordinance's requirements. In addition, Stopwaste.Org has developed, and most of its member agencies have adopted, a single-use bag ban ordinance.

These waste diversion efforts represent a constraint because they limit the flow of refuse to the ALRRF, but they are also an opportunity for the ALRRF to (a) reduce its litter cleanup effort if the bag ban has a material effect, and (b) provide processing of recyclables in a MRF that may be developed at the landfill in the future.

SECTION 2

Community Monitor Activities and Issues

2.1 Introduction

Under the terms of the Settlement Agreement, when the ALRRF is in compliance with operating requirements, the Community Monitor (CM) has three ongoing duties:

- Review reports, data and information related to the ALRRF's reports that are required to be submitted to regulatory agencies
- Conduct monthly inspections of the ALRRF facility
- Review the records of testing and acceptance of "Class 2 soils", i.e. soils known to come from a contaminated site.

Throughout 2013, the CM was active in each of these areas, as described below.

2.2 Monitoring of Improvements and Changes

Through report reviews and site visits, several new developments in ALRRF facilities and operations in 2013 became apparent:

- **Additional landfill gas wells** were brought on line in one round of installation, in mid-summer of 2013. Several landfill gas wells that were becoming unproductive were taken off line as well. This is a normal part of operations.
- **Construction of the upper (northern) portion of Fill Area 2** began in the late summer of 2013. Throughout the remainder of 2013, this construction consisted almost entirely of excavation to remove overburden and establish slopes that will control leachate as the area receives refuse. In essence, this "simplifies" and deepens the existing canyon, shaping it to direct liquids that reach the bottom of the landfill toward a collection point for extraction and reuse or treatment as needed. The almost complete lack of rain in the latter part of 2013 facilitated excavation, so that the excavation work was roughly 50% complete by the end of the year. After excavation is done, the landfill liner and other environmental management systems will need to be installed before refuse can be received in Fill Area 2.
- **Certain special operations areas in Fill Area 1 were relocated** to enable Fill Area 1 to expand into those locations. These included the solidification pit, the leachate truck fill station, and the C&D, scrap metal and plant-debris drop-off / loadout locations. To simplify operations, the new solidification area has two mixing pits; one for material that includes trash, and one for material that does not.
- **The north soil stockpile**, which had been a source of cover material and was gradually being emptied, began to receive excavated soil from Fill Area 2.

- **Additional stormwater controls** were installed in the latter part of 2013, in a continuing effort to control sediment and keep pollutants out of the storm water basins.

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. In 2013 there were no Violations and only one Area of Concern notice issued by the Local Enforcement Agency (LEA). The Area of Concern notice occurred because refuse was left exposed for more than one day during the construction of the new solidification pits on the top deck of the landfill. That issue was promptly corrected.

Two environmental aspects of landfill operations, litter control and bird control, presented difficulties for the operator and were noted repeatedly in the LEA's inspection reports. In addition, two incidents occurred at the site which required special attention from outside agencies: a fire, and the landfilling of some refuse that may exceed regulatory limits for copper content. Each of these topics is discussed below.

Minor violations were received from two agencies other than the LEA. Both were promptly addressed. The first stems from a source test of the site's 3,000-gallon above-ground fuel tank in July of 2013. The tank had been repainted in a way that required an exemption from the air district, but the ALRRF did not obtain that exemption prior to the repainting. The problem was resolved by painting the tank again, using compliant materials. The violation was cleared in March of 2014.

The second violation resulted from a CUPA4 inspection of hazardous materials facilities and documentation at the ALRRF. This inspection required three days and examined many aspects of the facility's handling and storage of hazardous materials, including but not limited to hazardous wastes. Five violations, all classified as minor by the CUPA, were noted in the November 25 inspection report. For example, new and used oil tanks present in the LNG plant were not noted on the site map. In a response dated December 20, ALRRF staff provide documentation that all of the violations had been completely addressed.

2.3.1 Windblown Litter

As has been noted elsewhere in this report, windblown litter has become a significant problem for the ALRRF as operations reach the final height of the landfill where exposure to wind is greatest. In 2013, this was exacerbated by several high-wind events. This has required extra effort by landfill crews to pick up litter from portions of the site that are not usually heavily impacted. The work needs to be done by hand because the surrounding hills have very steep slopes and some erosion gullies that make mechanized collection impossible.

There is no simple solution to this problem. The landfill geometry is continually changing, and the wind direction varies from day to day and sometimes throughout the day. This limits the effectiveness of temporary / portable fencing and other measures.

2.3.2 Birds

Prior to 2012, the normal seasonal behavior pattern for seagulls was that large flocks would form at the landfill in winter months when shoreline foraging was difficult due to stormy weather; and these flocks would largely disperse in summer. In 2012, with the completion and filling of the Dyer Road reservoir, seagulls began to occupy the reservoir and a large flock was present at the landfill throughout that year. In 2013, further changes have occurred. Gulls were seen throughout the year at the Dyer Road reservoir, but the summer population at the landfill was noticeably smaller than in 2012. The reason for the reduced population is not known. More raptors (hawks, owls, falcons) may have been active at the landfill, causing the gulls to disperse more during the day. This will continue to be monitored in the future.

2.3.3 Fire

In July of 2013, a fire broke out in the trash at the landfill, in an area that was difficult for landfill equipment to access. Alameda County FD was called to the scene and, working cooperatively with landfill staff, they extinguished the fire. The fire department was on scene for approximately four hours. No landfill equipment was damaged, and refuse handling shifted to another area during the incident to avoid interruption.

2.3.4 Unprofiled Material with High Copper Content

The following description is based on notes in the Special Occurrences log at the landfill, verbal descriptions by landfill staff, and direct observation. On June 21, the refuse brought by San Francisco transfer trucks during the night shift apparently included material that had been disposed at the San Francisco transfer station by a contractor that had cleaned a boat repair facility. This material may have contained high levels of copper, possibly exceeding regulatory limits for Class 2 material, originating from the anti-fouling paint used on boat hulls. This was reported to ALRRF the next day, and the decision was made to isolate the area and notify regulatory agencies including the Regional Water Board and the Department of Toxic Substances Control. The regulators have required testing, and samples were taken in late December. Results are not yet available. Regulators may require that the material be left in place, encapsulated, moved to a different location, disposed off site, or managed in another way to be determined.⁴

2.4 Review of Reports

2.4.1 Groundwater

Two groundwater monitoring reports were reviewed in 2013. The first covered the time frame from July through December of 2012; the second covered January through June of 2013. Both reports reflect the Waste Discharge Requirements issued by the Central Valley Regional Water Quality Control Board that took effect in April of 2009.

Groundwater monitoring results did not differ appreciably from prior years. Contaminants, when present, are well below regulatory limits that would require remediation. For most contaminants, trends in the data are indistinct or gradually declining. However, the fuel additive MTBE and its

⁴ As of March 2014, guided by the results of sampling and testing, approximately 134 cubic yards of potentially contaminated material were removed and delivered to a hazardous waste landfill. The incident is considered closed, and landfilling of solid wastes has resumed in the affected area.

degradation by-product tert-butyl alcohol appear to have concentrations that are increasing in certain wells, although not steadily. Continued monitoring of these reports is recommended.

2.4.2 Storm Water

The annual storm water report for 2012-2013 was issued in June of 2013. It documents storm water protection measures and monitoring efforts as required by regulations and permits. It is similar to prior years' reports in that it shows a few storm water pollutants exceeding "benchmark" levels during the reporting year in spite of improvements to the storm water pollution protection systems at the site. These improvements include Best Management Practices (BMP's) such as silt traps in drain inlets, installing wattle upslope of drainage ditches, and other means of preventing and controlling erosion. It concludes with a commitment to increase the use of BMP's for the 2013-2014 rainy season; and indeed there were additional BMP's installed at the site in the fall of 2013. Due to the severe drought now under way, virtually no runoff has occurred in the second half of 2013; so it has not yet been possible to evaluate the BMP's or to test discharges from the three storm water basins on site.

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 2013, we received the Title V reports for the periods June – November 2012, and December 2012 – May 2013. These reports describe landfill gas control operations and source testing, but they also document new or unique developments at the site that can have an effect on air emissions. Results from 2013 are very similar to those from 2012:

- Approximately 15 new landfill gas wells were installed and placed into service.
- Surface emissions monitoring continued, and although exceedances were found, they were typically remedied on the first try, without the need for repeated repairs.
- The LNG plant continued to operate, and unscheduled down-time was minimal.
- All control devices passed their emissions tests without incident.

There was one unique development in 2013. During the latter part of the second monitoring period (April and May), landfill gas consumption diminished slightly because less gas was available. This is the first time that the system has been constrained by a lack of gas; this may be a long-term effect due to the addition of the LNG plant to the landfill gas control devices at the ALRRF.

2.4.4 Mitigation Monitoring

The Mitigation Status Report covering calendar year 2012 was received in January 2013. 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. We found that the status descriptions accurately reflected the current status of each mitigation measure.

The primary new development in 2012 was the recording of the Conservation Easement, which enabled the ALRRF to go forward with its Mitigation Plan to meet environmental requirements for the construction of Fill Area 2.

2.5 Review of Records

Several types of site records were reviewed by the Community Monitor in 2013. The Community Monitor's scope of work requires the periodic review of files that contain lab analyses and other descriptions of **Class 2 soils** (considered hazardous by California standards, but not by Federal standards) that are brought to the site for use as cover soil. Also, the **Special Occurrences Log** for the ALRRF was examined several times during the year, as part of monthly site inspections. The **LEA's weekly inspection reports** are publicly available on the CalRecycle web site and were checked by the Community Monitor every few weeks, to identify any new issues that may have arisen. Finally, an effort was made to review the **MRF Fines Study records** near the end of 2013, but they were not available because ALRRF staff were using them to prepare a report on that study. They will be checked when they are available, in early 2014.

2.5.1 Class 2 Soils

An ongoing task for the Community Monitor team 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 currently conducted two to three times per year, and it requires most of a day for a qualified specialist from Treadwell and Rollo to review each file to be sure that it is complete and within the regulatory limits for Class 2 materials. In 2013, these reviews were conducted in January, June and December. A total of approximately 250 files were reviewed. No out-of-compliance profiles were found. Each time, several files (typically 8 or 9) were incomplete but were found to be complete in the subsequent review. This occurs because the files are maintained electronically and scanning the lab analyses adds a step to the filing process that can take additional time to complete.

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 checked throughout 2013. As in prior years, the most common incident was the occasional mishap involving large end-dump semi-trailers that become unbalanced while the bed is elevated, causing the truck bed to fall to one side. Fortunately, there were no injuries associated with these incidents. Four such incidents were logged in 2013. Other logged incidents included the receipt of wastes potentially high in copper, a fire in the active area of the landfill, a work stoppage on March 15, and a collision on site that resulted in injury to an employee. Additional detail on several of these items may be found in Section 2.3 above.

2.5.3 LEA Inspection Reports

In 2013, ongoing difficulties with windblown litter were frequently noted in the LEA inspection reports. Other less frequent problems included insufficient cover (quickly remedied; no violation issued); the condition of the entry road (currently being repaired as needed) ponding of standing

water (corrected by re-grading) and concern regarding the quality of the MRF fines being tested for use as cover.

2.6 Monthly Inspections

Twelve site inspections were held during 2013. To obtain the best possible understanding of the range of operating conditions, the inspection day and time were varied as shown in Table 2-1 below.

Table 2-1
Site Inspection Summary

Date	Day of Week	Inspection Time	Announced in Advance?	With LEA staff?
Jan 23	Wed	9:30 AM	no	yes
Feb 25	Mon	10:00 AM	yes	no
Mar 28	Thurs	10:30 AM	no	yes
Apr 29	Mon	2 PM	no	yes
May 21	Tue	5:30 AM	yes	no
Jun 5	Wed	2:30 PM	no	yes
Jul 17	Wed	5:00 AM	yes	no
Aug 21	Wed	7 AM	yes	no
Sep 11	Wed	4:45 PM	yes	no
Oct 9	Wed	10:00 AM	no	yes
Nov 26	Tue	8:30 AM	yes	no
Dec 23	Mon	10:30 AM	yes	no

In general, satisfactory conditions were observed, and minor problems were rectified prior to the next inspection. Details are available in the monthly site visit reports provided to CMC members. There were no observed problems regarding refuse placement, public safety or traffic management. Throughout these inspections, staff and management were forthcoming regarding operating practices and current conditions. Distinct operations, such as the stockpiling and processing of specific materials, took place in well defined areas. No instances of unpermitted activities were noted.

In 2013 our observations continued to focus on:

- Storm drainage and erosion control, including the installation and performance of stormwater Best Management Practices.
- Traffic on site, and the adequacy of crews and equipment to handle incoming traffic and waste volumes.
- General observations of fill activities, including spreading, compaction and traffic control during normal and off-hours operations.
- Observation of issues of concern, including the increased presence of seagulls and the quality of materials used as Alternative Daily Cover.
- Management of windblown litter, which is an ongoing problem as Fill Area 1 reaches its maximum height.

In addition, the beginning of construction of a portion of Fill Area 2 was observed throughout most of the year, beginning with the discing of the construction area (to exclude and discourage burrowing owls and other sensitive species).

The Scope of Work for the Community Monitor specifies that at least three inspections be performed off hours, and that approximately four to six be performed jointly with the LEA. As shown in the table above, three off-hour (May, July, September) and five joint inspections were conducted in 2013.

In addition to the on-site inspections, counts of arriving refuse trucks were conducted by the Community Monitor in January and July of 2013. These counts continued to be well below the limit stipulated in the CUP.

SECTION 3

Looking Ahead: Anticipated Efforts and Issues

3.1 Introduction

In the 2014 contract year, our efforts will continue to focus on report review, site inspections and Class 2 soils file review. As Fill Area 1 nears completion, operations will become more complex in order to control the final height and shape of the filled area, and windblown litter will probably continue to be an issue. Also, as the ALRRF continues the development of Fill Area 2, we may need to spend time reviewing mitigation plans and reports for the Conservation Plan Area or other parts of the site.

3.2 Issues to be Tracked in 2014

3.2.1 Ongoing Report Review

With regard to report review, the following issues will continue to be monitored in the coming year:

- Groundwater monitoring methods.
- Groundwater quality, including the vadose zone.
- Stormwater quality and management practices.
- Performance of landfill gas handling equipment.
- Additional changes to the landfill gas extraction system.
- Surface emissions monitoring.
- Reports related to the development and use of Fill Area 2.

3.2.2 Site Inspections

All operations will continue to be observed, and the following areas will receive emphasis.

3.2.2.1 Landfill Gas Control System

Performance of this system is closely related to groundwater quality, and it takes place within a complex regulatory framework involving Federal permits, local permits, new State regulations, and ALRRF CUP conditions. Physical changes to this system are likely to include the further addition of landfill gas extraction wells, decommissioning of wells that are no longer productive, and ongoing operation of the LNG plant.

3.2.2.2 Stormwater Controls and Monitoring

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

3.2.2.3 Windblown Litter

As noted above, this will continue to be an issue for Fill Area 1.

3.2.2.4 Fill Area 2

We will continue to observe construction, which will likely involve the completion of excavation and installation of the liner in the excavated area. If mitigation plans regarding the Conservation Plan Area or the Conservation Easement are submitted to a regulatory agency, we will review them to the extent required by the Settlement Agreement.

3.2.3 Class 2 Soils File Review

As required in our Scope of Work, we intend to conduct this review several times through the year 2014.

3.3 Project Management Considerations

As we begin a new contract in 2014, we expect the budget to be sufficient throughout the 3-year contract period. The greatest effort is likely to occur in 2015, when the five-year permit review is expected to take place.