

Central Valley Regional Water Quality Control Board

22 August 2014

APPROVED	
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senior	_____

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Richard D. Steffan,
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Agent for Service of Process
389 Auburn Ravine Road
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***REJECTION OF LIMITED LANDFILL TESTING WORK PLAN, BERRY STREET MALL
(AKA FINGER'S) LANDFILL, PLACER COUNTY***

The Berry Street Mall (Aka Finger's) Landfill (Site) is owned by A Greener Globe, Inc. (hereafter Discharger) and is regulated by Waste Discharge Requirements (WDRs) Order R5-2011-0048. The Site is a closed Class III landfill located along Galleria Boulevard about three tenths of a mile north of Berry Street in the City of Roseville.

Central Valley Water Board staff (hereafter Board staff) reviewed the 15 July 2014 *Limited Landfill Testing Work Plan (Work Plan)*. The *Work Plan* proposes to excavate, test, and characterize waste as a preliminary step towards developing a clean closure plan for the Site. The proposed excavation will remove about 13,300 cubic yards of waste and soil, including a portion of the existing clay cover, and all excavated material will be segregated and stockpiled onsite for reuse or offsite disposal.

Board staff support the clean closure of this small unlined landfill, with all removed waste placed into a modern Title 27 Class II waste containment unit. Board staff would also support a proposal to thoroughly assess the nature of the waste remaining beneath the Site, as a preliminary step towards achieving clean closure. However, the scope of work contained in the *Work Plan* exceeds characterization. The scope of work actually includes the removal of waste, the removal and replacement of a large section of the Site's existing final cover, and a change to post-closure land use.

The *Work Plan* is inadequate to effectively characterize the existing waste, protect human health during waste removal, assess post waste removal conditions, or replace the Site's waste containment and control measures originally installed by CalRecycle to protect human health and waters of the State. Therefore, your proposed scope of work as outlined in the *Work Plan* is rejected.

The Central Valley Water Board maintains jurisdictional authority over post closure land use through the issuance of WDRs. Consequently, an Amended Report of Waste Discharge (ROWD), detailing the Discharger's proposal to clean close the Site, must be submitted, reviewed by Board staff, and new WDRs adopted by the Board before any waste removal or modifications to the final cover can occur.

Additionally, the Discharger has failed to comply with the Site's WDRs and a 9 April 2014 *Notice of Violation For Delinquent Reports (NOV)*, issued for violating the WDRs. Therefore, Board staff has recommended further enforcement actions to compel the Discharger to comply with their WDRs. Before the Discharger prepares the amended RWOD, all issues outlined in the *NOV* must be addressed. To help the Discharger prioritize work to address both the outstanding *NOV*, and ultimately prepare an amended RWOD to clean close the Site, we recommend the Discharger contact Board staff to set up a meeting to discuss these unresolved issues.

To set up a meeting with Board staff, please contact me at (916) 464-4817 or by email at paul.sanders@waterboards.ca.gov.

Original signed by

PAUL SANDERS, P.G.
Engineering Geologist
WDR Compliance and Enforcement Unit

cc: Vanessa Young, Office of Enforcement, State Water Board, Sacramento
Glenn Young, CalRecycle, Closed, Illegal, & Abandoned Sites Unit, Sacramento
Paul Holloway, Placer County Environmental Health, Auburn
Thomas Ballard, Geological Analytics, Antelope

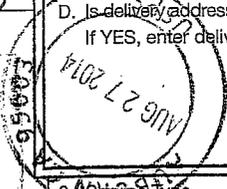
Section cut from letter, to be used as a reference in a future meeting

To clean closing this Site, the Discharger will first be required to submit an amended ROWD and Site assessment work plan, which addresses in detail all landfill closure, partial closure and post closure requirements as required in Title 27 Sections: 21790, 21800, 21810, 21820, 21870. Additionally, financial assurance requirements as outlined in Title 27 Section 22205(a), requiring the operator to demonstrate the availability of financial resources to conduct closure activities, will be required.

The limited nature of the *Work Plan* prevents the preparation of detailed comments. However, select Board staff concerns with the *Work Plan* are outlined below.

- An investigation to assess the nature of the waste to be removed, which will require laboratory analytical testing, will be required before any excavation through the cover will be approved.
- Disposal options for the types of waste identified, along with a contingency plan to address any hazardous or designated waste encountered during the excavation, will be required.
- Detailed Construction Quality Assurance (CQA) work plans will be required for each element of construction work proposed for the Site, including;
 - Final Site grading and drainage,
 - Reconstruction of the low-hydraulic-conductivity layer (cover),
 - Reconstruction of the perimeter and crest access roads,
 - Reconstruction of the leachate control system,
 - Reconstruction of the standby gas collection system,
 - Reconstruction of the perimeter stormwater drainage culverts,
 - Any post closure land use facilities,
 - Reconstruction of storm water control measures atop the new final cover slope. The proposed steeper slopes along the southern portion of the Site will likely require additional erosion control measure.
- The *Work Plan* discusses the use of a trammel and/or power screens to sort waste/dirt; however, only a water truck and stockpile covers are proposed for dust control.
- The *Work Plan* states that all proposed work will only occur during the dry season, and that no work will occur during wet weather. However, all water that contacts waste, be it for dust control or from a rain event becomes contact water, and the *Work Plan* will need to contain a proposal to ensure that all potential contact water is contained and properly disposed as required by Title 27. A construction stormwater permit will also be required to complete the proposed scope of work.

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<p>1. Article Addressed to:</p> <p style="text-align: center; font-size: 1.2em;">Daniel Sheehan A Greener Globe Inc. 5009 Southside Ranch Road Roseville, CA 95677</p>	<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p> <p>3. Service Type <input type="checkbox"/> Certified Mail® <input type="checkbox"/> Priority Mail Express™ <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> Collect on Delivery</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
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