



**Placer County  
Health and Human Services Department**

**Jeffrey S. Brown, M.P.H., M.S.W.**  
Department Director

**Wesley G. Nicks, R.E.H.S.**  
Environmental Health, Director

August 26, 2014

Daniel Sheehan  
A Greener Globe Corporation  
5009 Southside Ranch Road  
Rocklin, CA 95677

**RE: Berry Street Mall Landfill Limited Landfill Testing Work Plan; SWIS #31-AA-0120**

Dear Mr. Sheehan:

Environmental Health Services, as the Local Enforcement Agency (LEA), has received the August 22, 2014 letter of rejection from the Central Valley Regional Water Quality Control Board (CVRWQCB) for the subject work plan. While the LEA is supportive of clean closure of the site, all agencies requirements must be met prior to the commencement of work. Therefore, the LEA cannot grant any acceptance of the work plan as proposed. The LEA recommends that the owner schedule a meeting with the CVRWQCB at his earliest convenience to discuss what specific requirements that the CVRWQCB has.

Upon consultation with staff at CalRecycle, the LEA will require additional information if the owner is to submit a new work plan. These requirements should be addressed in future work plan submittals:

- 1) Solid Waste Facility Operating standards should be applied to the project similar to those standards for an active landfill while the investigation is in progress. These should include (at minimum) tarping (or daily cover), site security, odor control, LFG monitoring, litter control, etc.
- 2) A worker Health & Safety plan should be prepared to address specific hazards associated with working with landfilled wastes.
- 3) LEA Advisory number 16 for Clean-closure guidance should be followed at all times (<http://www.calrecycle.ca.gov/LEA/Advisories/16/>).
- 4) If waste is to be processed and segregated from soils to be re-used as on-site fill, a testing protocol will be required which will require CVRWQCB review and approval.
- 5) A preliminary survey for radiological and asbestos-containing materials should be provided.
- 6) The City of Roseville should be consulted for any possible CEQA requirements, as this proposed work plan may require a filing of a CEQA document (such as a Negative Declaration, Mitigated Negative Declaration, etc.)

The LEA is available to join in any meeting that takes place between the owner and the CVRWQCB, if requested. The LEA strongly encourages the owner to comply with the previous Notice of Violation for Delinquent Reports (dated April 9, 2014) as noted in the CVRWQCB letter, prior to scheduling any meetings with the CVRWQCB. The LEA has stated in various inspection reports that quarterly water

and landfill gas (LFG) reporting must be submitted on-time and at proper intervals to remain in compliance.

If you have any questions, please contact me at (530) 745-2345 or phollowa@placer.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to be 'PH' followed by a stylized flourish.

Paul Holloway, R.E.H.S.  
Hazardous Materials/Solid Waste Section

c: Angela Basquez, CalRecycle  
Paul Sanders, CVRWQCB  
Thomas Ballard, Geological Analytics