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February 14, 2014

VIA EMAIL (candace.andersen@bos.cccounty.us)

Chairperson Candace Andersen and
Members of the Board of Directors
Central Contra Costa Solid Waste Authority
1850 Mt. Diablo Boulevard, Suite 320
Walnut Creek, CA 94596

Re: List of Questions In Response to Request from CCCSWA

Dear Ms. Swanborn:

In response to the request of the Central Contra Costa County Solid Waste Authority ("CCCSWA"), Mt. Diablo Recology, LLC ("MDR") submits the following questions, the answers to which have critical importance respecting the integrity of the bidding process for the CCCSWA's Franchise Agreement, and its award. At the January 30, 2014 Board meeting, members of the Board requested this list of issues and the undersigned committed to providing it. Accordingly, MDR respectfully requests that CCCSWA answer the questions as quickly as it is able to do so.

In reference to the questions set forth below, please consider the term "CCCSWA" to also include CCCSWA staff and HF&H. Also the term "Republic" refers to both Republic Services and Allied Waste Systems, and all other Republic and Allied affiliated parties (e.g., the Keller Canyon Landfill Company).

General Questions Regarding the Checking and Audit of Data Submitted with and Supporting Republic's Proposal.

- 1) Has CCCSWA ever audited the reporting and annual figures provided by Republic and Waste Management to determine the accuracy of their reports and figures? If so, please provide MDR with copies of each audit.
- 2) Why are there virtually no additional costs associated with Republic's high diversion proposal? Has the CCCSWA looked into this fact? If so, please provide us with copies of any written analysis of this issue, and a summary of any oral discussions on this point.
- 3) CCCSWA made it clear in public meetings that they will be recommending Republic in part because their high diversion proposal is less

expensive. The consultants acknowledged that MDR's high diversion proposal, while "similar" to Republic's proposal, achieved somewhat higher levels of diversion. MDR's proposal offers a substantially higher level of diversion, which would be implemented considerably sooner. Specifically, MDR will provide a diversion rate of 90%+ by the year 2025, which never was compared to Republic's high diversion goal of 60% – 70%. The two proposals are not roughly equal on diversion. Please provide copies of written analysis, and summaries of any oral discussions, regarding these facts.

- 4) On the basis of what information did the Ad Hoc Committee make its recommendation? Did the Ad Hoc committee make its decision on the basis of CCCSWA consultant presentations only? If not, please provide a list of, and copies of, all materials on which the Ad Hoc Committee based its recommendation.

Questions Regarding Verification of Republic's Compliance with Use Permit and Applicable Law.

- 1) Has CCCSWA ever conducted an audit or review of Republic's compliance with the terms and conditions of their current franchise agreement? If so, please provide MDR with copies of each contract compliance audit/or review.
- 2) Prior to preparing the CCCSWA Request For Proposals ("RFPs"), receiving the submitted proposals, and recommending Republic for collection, transfer and disposal, did CCCSWA review the Keller Canyon conditional use permit and solid waste facilities permit? If so, please provide MDR with copies of each written report and/or analysis relating thereto, and a summary of any oral discussions related thereto.
- 3) As the attached report from Loewke Planning Associates documentation shows (supported by printouts from Web sites maintained by the United States Environmental Protection Agency and CalRecycle), Republic appears to have received a number of regulatory violations in the past five years. Has the CCCSWA received notice from Republic during the course of the RFP process of these violations, or: any other violations issued by CalRecycle, Contra Costa County, or other regulatory entities with respect to Republic or its operations; any information regarding contractual defaults by Republic with public agencies; any lawsuits, pending or concluded, against Republic? Has the CCCSWA investigated whether any of these violations are pending? If so, please provide MDR with copies of each written report and/or analysis relating thereto, and a summary of any oral discussions related thereto. Please also provide us with copies of all violation records known to the CCCSWA related to Republic's operations in the State of California and its operation of Keller Canyon.

- 4) A company's performance record is listed in the RFPs as an evaluation criterion. Has the CCCSWA accounted for any Republic violations in making its recommendation? If so, please provide MDR with copies of each written report and/or analysis relating thereto, and a summary of any oral discussions related thereto.

Questions Regarding Republic's Use of Green Waste and Alternative Daily Cover.

- 1) From commencement of CCCSWA's franchise agreement with Republic, did CCCSWA ever authorize Republic to direct haul green waste materials from the CCCSWA franchised area to Keller landfill? If so, please provide the dates of each direct haul, the CCCSWA member's jurisdiction and the amount of the tonnage delivered for each direct haul.
- 2) From commencement of CCCSWA's franchise agreement with Republic, did CCCSWA ever authorize Republic to transport green waste with food waste to Keller or any other landfill for use as alternative daily cover? If so, please provide the dates of each such delivery, the landfill, from which members jurisdiction and the amount of tonnage of each delivery.
- 3) In a number of public presentations, Republic has indicated that it has complied with and operated in accordance with the terms and conditions of its present franchise agreement with the CCCSWA. Is it CCCSWA's position that Republic is authorized by CCCSWA to direct haul unprocessed green waste to Keller to be used as ADC, and to deliver green waste with food waste to Keller or any other landfill to be used as ADC?
- 4) CCCSWA's franchise agreement appears to authorize both the above practices. Did CCCSWA ever amend its franchise agreement with Republic to eliminate these practices, consistent with state law? If not, please provide an explanation as to why the franchise agreement was not amended. If it was amended, please provide a copy of the amendment.
- 5) Please provide a list of all "Designated Green Waste and Food Waste Processing Facilities" approved by CCCSWA for the processing of green waste and food waste collected within the CCCSWA boundaries. Please provide the dates of each approval, who approved the designation, and any writing referencing each approval.
- 6) From commencement of its Franchise agreement, has CCCSWA ever conducted a review or audit to verify where its green waste is delivered, and whether any of the material is composted? Please provide us with written

copies of any audit, and a summary of any oral discussions or analysis regarding this topic.

Questions Regarding Republic's Refusal to Allow Competing Parties to Use Keller Canyon Landfill in Conjunction Their Offered Services; Questions Regarding "Stand-Alone" Rate for Keller Canyon of \$69+ Per Ton.

- 1) Per the CCCSWA's most recent staff report and its attachments (e.g., Attachments A.5 and 11.C), Republic has indicated it will not allow companies who bid on competing services (e.g., transfer, collection) to partner with Keller Canyon. When did Republic make this statement, either orally or in writing, and to whom? Please provide us any copies of any written materials received by Republic, and a written summary of any oral representations made by Republic.
- 2) When did CCCSWA first notify the CCCSWA Board of Directors, Ad Hoc Committee, and the other proposers that Republic refused to "mix and match" RFP proposals, as described above? Please provide us with copies of any written materials concerning this issue, and a written summary of notifications received orally.
- 3) Did Republic ever provide to CCCSWA an explanation, either orally or in writing, as to why it would not "mix and match" proposals with MDR? If so, what explanation was given? Please provide us with copies of any written explanations, and a written summary of any oral explanations.
- 4) Has Republic represented to the CCCSWA that it is unwilling to partner with MDR insofar as it bid on the recycling component of the new franchise, or any company aside from Pacific Rim Recycling? If so, when did Republic make this statement, and to whom? Please provide us with copies of any written materials concerning this issue, and a written summary of statements received orally.
- 5) In Republic's bid, it quoted a "stand-alone" price for use of Keller Canyon by competitors of approximately \$69. Did CCCSWA ever attempt to analyze what an appropriate landfill disposal fee would be for disposal of CCCSWA solid waste at Keller?
- 6) Did CCCSWA ever contact any other jurisdictions, companies, the County of Contra Costa, or other entities to attempt to determine what an appropriate landfill disposal rate should be? If so, please provide a list of the parties contacted, any information provided, and any resulting analysis made by CCCSWA or provided by a third party.
- 7) Was the CCCSWA Board of Directors ever notified, orally or in writing, that Keller Landfill's conditional use permit required Keller to provide an

appropriate landfill disposal fee for solid waste for areas within Contra Costa County? If so, please provide the dates and any written report or communication.

- 8) What efforts did CCCSWA make, to have Keller provide CCCSWA with an appropriate landfill disposal rate?

Questions Regarding Routing Information and Cost Allocation Among CCCSWA Member Agencies.

- 1) Staff at the last CCCSWA board meeting acknowledged an error by Republic concerning its CCCSWA member allocation, where it appears Republic did not properly account for service costs of "hard-to-serve" areas in Orinda, Moraga, and Lafayette. Did Republic or staff adjust the allocation? If so, please provide the adjusted allocation.
- 2) Staff also indicated there may be other math errors in the RFP proposals. If so, please identify each error and provide any corrections that have been made.

Questions Regarding Information Received and Assumptions Concerning Pacific Rim Recycling.

- 1) In its presentation at the last Board meeting, Pacific Rim Recycling ("PRR") conceded that its plant in Benicia is out-of date and must be upgraded. Moreover, as a land use attorney pointed out at the meeting, the Pacific Rim Recycling plant has limited capacity and several permitting obstacles which restrict its ability to meet terms of the contemplated franchise agreement. Prior to recommending PRR, did CCCSWA or the Ad Hoc Committee independently review or analyze the representations of PRR regarding its residual numbers, facility operation, present permits, facility processing limits, and required future permits in order to properly process CCCSWA's recycling materials? If so, please provide us with copies of the review or analysis documents, and summarize any oral discussions.
- 2) Prior to recommending PRR, did CCCSWA or the Ad Hoc Committee independently review what changes would be necessary to PRR's present operations, from both a permit and operations standpoint, in order to properly process CCCSWA's present and future recycling demands? If so, please provide us copies of any written reports or analyses, and a written summary of any oral discussions.
- 3) PRR represented in its initial presentation to the CCCSWA Board that it would only process residential recyclables and would provide service for multi-family and commercial recycling on an individual customer basis. Has that changed? If so, what changes have been made in PRR's proposal? If

not, who is CCCSWA recommending to process state mandated commercial and multi-family recyclable materials?

- 4) How did CCCSWA determine the number of collection vehicle routes in its RFP? If the number of routes was provided by a third party, who was the third party and what was provided? Please provide any documentation relating to your routing determinations, and a written summary of any oral discussions.
- 5) Did CCCSWA independently review the collection routing numbers provided in the Republic and MDR proposals? If so, please us with copies of any written analysis, and a written summary of any oral discussions.
- 6) Please confirm how many routes Republic operates today. If Republic's current proposal involves a reduction in routes, or does not provide increased routes in proportion with the expected increase in franchise tonnage throughout the duration of the new franchise term, how will this reduction of routes impact the transition to new services? How will this reduction in routes impact working conditions, including hours and safety concerns. Please provide us copies of any written analyses that CCCSWA has conducted with respect to these issues, and a written summary of any oral discussions.
- 7) Did CCCSWA analyze the impact to streets within its boundaries based upon Republic's proposed use of large, heavier Curotto vehicles? If so, please us with copies of any written analysis, and a written summary of any oral discussions.

We respectfully request that you provide answers to the above questions, and the requested documents, no later than February 21, 2014. If you require a formal public records act request under Government Code section 6250 et seq., please let us know and we will submit one immediately. Thank you for your attention to these important matters.

Sincerely,

MILLER STARR REGALIA



Wilson F. Wendt

WFW:nmt

Enclosures

cc: Members of the CCCSWA Board

Tracy Swanborn
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Page 7

Kenton Alm, Esq. (kalm@meyersnave.com)
Paul Morsen (paul@wastediversion.org)
Bart Carr, (bart@wastediversion.org)
Tracy Swanborn (tswanborn@hfh-consultants.com)
Clients

Republic / Keller Canyon Landfill Analysis

This document summarizes the issues related to Keller Canyon Landfill and the Republic Proposals for the "Collection and Processing" and "Transfer and Landfill" operations.

From our research of Republic and of Keller Canyon landfill, the following issues have occurred:

- Current EPA Facility Status for Keller Canyon: "Significant Violation"
- The EPA's ECHO database currently lists Keller Canyon having been in non-compliance with the SIP (State Implementation Plan), Title 5 Permits, and Facility-Wide Permit Requirements for the past 12 consecutive quarters.
- The EPA's ECHO database currently lists Keller Canyon Landfill as a "High Priority Violator" (HPV), and the state has taken lead enforcement against their violation status for corrective action.
- The EPA's ECHO database shows that during the past 5 years Keller Canyon Landfill has received the following enforcement actions:
 - one informal enforcement action with a State Issued NOV (08/30/2010)
 - two formal enforcement actions with State Administrative Orders Issued (02/02/2009 & 12/13/2010)

You have been redirected from the former ECHO site to the modernized ECHO, now at echo.epa.gov. Please update your bookmarks, and see our ECHO Modernization Information page to learn about the new ECHO.

Detailed Facility Report

Facility Summary

KELLER CANYON LANDFILL
901 BAILEY ROAD, PITTSBURG, CA 94565

Facility Information (FRS)

FRS ID: 110001163053

EPA Region: 09

Latitude: 38.012469

Longitude: -121.94197

Industry:

Indian Country: N

Regulatory Interests

Clean Air Act: Operating Major (06013A4618)

Clean Water Act:

Resource Conservation and Recovery Act:

Safe Drinking Water Act:

Also Reports

Air Emissions Inventory (EIS): 276111

Greenhouse Gas Emissions (eGGRT): 1004011

Toxic Releases (TRI):

Enforcement and Compliance Summary

Statute	Insp (5 Years)	Date of Last Inspection	Current Compliance Status	Qtrs in NC (of 12)	Qtrs in Significant Violation	Informal Enforcement Actions (5 years)	Formal Enforcement Actions (5 years)	EPA Cases	Penalties (5 years)
CAA	1	10/01/2009	Significant Violation	0	12	1	1	--	\$2,250

Facility/System Characteristics

Facility/System Characteristics

Statute	Identifier	Universe	Status	Areas	Permit Expiration Date	Indian Country	Latitude	Longitude
	110001163053	--	--	null	N		38.012469	-121.94
CAA	06013A4618	Major	Operating	--	null	--	--	--
CAA	1004011	Direct Emitter	Active	--	null	--	38.006263	-121.94
CAA	276111	Landfill	Operating	--	null	--	38.01727	-121.94

Facility Contact Information

System	Identifier	Facility Name	Facility Address	Contact Name	Contact Telephone
FRS	110001163053	KELLER CANYON LANDFILL	901 BAILEY ROAD, PITTSBURG, CA 94565	x	x
AFS	06013A4618	KELLER CANYON LANDFILL COMPANY	901 BAILEY RD, PITTSBURG, CA 94565	x	x
GHG 2012	1004011	KELLER CANYON LANDFILL	901 BAILEY ROAD, PITTSBURG, CA 94565	x	x
EIS 2011	276111	KELLER CANYON LANDFILL COMPANY	901 BAILEY ROAD, PITTSBURG, CA 94565	x	x

Facility SIC Codes

System	Identifier	SIC Code	SIC Desc
AFS	06013A4618	4953	--

Facility NAICS Codes

System	Identifier	NAICS Code	NAICS Desc
AFS	06013A4618	562211	Hazardous Waste Treatment And Disposal
GHG 2012	1004011	562212	Solid Waste Landfill
EIS 2011	276111	562211	Hazardous Waste Treatment And Disposal

Enforcement and Compliance

Compliance Monitoring History (5 years)

Statute	Source ID	System	Inspection Type	Lead Agency	Date	Finding
CAA	06013A4618	AFS	STATE CONDUCTED FCE/ON-SITE	State	10/01/2009	--
CAA	06013A4618	AFS	STATE PCE/ON-SITE	State	12/18/2009	--

Compliance Summary Data

Statute	Source ID	Current SNC/HPV	Description	Current As Of	Qtrs in NC (of 12)
CAA	06013A4618	Yes	VIOLATION ADDRESSED; STATE HAS LEAD ENFORCEMENT	01/04/2014	12

Three Year Compliance Status by Quarter

Program/Pollutant/Violation	Q TR	Q TR	Q TR	Q TR	Q TR	Q TR
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Statute Type	1	2	3	4	5	6	Q TR 7	Q TR 8	Q TR 9
CAA (Source ID: 06013A4618)	04/01-07/01-06/30 2011	10/01-01/01-09/30 2011	01/01-04/01-12/31 2011	01/01-07/01-03/31 2012	04/01-07/01-06/30 2012	07/01-10/01-09/30 2012	10/01-12/31 2012	01/01-03/31 2013	04/01-06/30 2013
Facility-Level Status	HPV	HPV	HPV	HPV	HPV	HPV	HPV	HPV	HPV
HPV History	Addr- State	Addr- State	Addr- State	Addr- State	Addr- State	Addr- State	Addr- State	Addr- State	Addr- State
Program/Pollutant in Current Violation									
CAA SIP	--	--	--	--	--	--	--	--	--
CAA TITLE V PERMITS	--	--	--	--	--	--	UNKNOWN	UNKNOWN	UNKNOWN
FACILITY-WIDE PERMIT REQUIREMENTS	--	--	--	--	--	--	--	--	--

Informal Enforcement Actions (5 Years)

Statute	Source ID	Type of Action	Lead Agency	Date
CAA	06013A4618	STATE NOV ISSUED	State	08/30/2010

Formal Enforcement Actions (5 Years)

Statute	Source ID	Type of Action	Lead Agency	Date	Penalty	Penalty Description
CAA	06013A4618	STATE ADMINISTRATIVE ORDER ISSUED	State	12/13/2010	2250	--

ICIS Case History

Primary Law/Section	Case No.	Case Type	Lead Agency	Case Name	Issued/Filed Date	Settlement Date	Federal Penalty	St Pe
No data records returned								

Environmental Conditions

Water Quality

Permit ID	Watershed (HUC 8)	Watershed Name (HUC 8)	Watershed (HUC 12)	Watershed Name (HUC 12)	Receiving Waters	Impaired Waters	Co Se: Sy:
No data records returned							

Air Quality

Non-Attainment Area?	Pollutant(s)
Yes	Ozone
No	Lead
Yes	Particulate Matter

Pollutants

TRI History of Reported Chemicals Released in Pounds per Year at Site

Year	Total Air Emissions	Surface Water Discharges	Off-Site Transfers to POTWs	Underground Injections	Releases to Land	Total On-site Releases	Total Off-site Releases
------	---------------------	--------------------------	-----------------------------	------------------------	------------------	------------------------	-------------------------

No data records returned

TRI Total Releases and Transfers by Chemical and Year

Chemical Name

No data records returned

Demographic Profile

Demographic Profile of Surrounding Area (3 Miles)

This section provides demographic information regarding the community surrounding the facility. ECHO compliance data alone are not sufficient to determine whether violations at a particular facility had negative impacts on public health or the environment. Statistics are based upon the 2010 US Census and American Community Survey data, and are accurate to the extent that the facility latitude and longitude listed below are correct. The latitude and longitude are obtained from the EPA Locational Reference Table (LRT) when available.

Radius of Area:	3	Land Area:	94%	Households in Area:	17,632
Center latitude:	38.012469	Water Area:	6%	Housing Units in Area:	18,912
Center Longitude:	-121.94197	Population Density:	2,262/sq.mi.	Households on Public Assistance:	883
Total Persons:	59,759	Percent Minority:	62%	Persons Below Poverty Level:	23,292
Race Breakdown		Persons (%)	Age Breakdown		Persons (%)
White:	22,745 (38.06%)		Child 5 years and younger:	5,012 (8.39%)	
African-American:	7,896 (13.21%)		Minors 17 years and younger:	17,154 (28.71%)	
Hispanic-Origin:	28,801 (48.2%)		Adults 18 years and older:	42,605 (71.29%)	
Asian/Pacific Islander:	9,805 (16.41%)		Seniors 65 years and older:	4,354 (7.29%)	
American Indian:	504 (.84%)				
Other/Multiracial:	18,809 (31.47%)				
Education Level (Persons 25 & older)		Persons (%)	Income Breakdown		Households (%)
Less than 9th Grade:	5,267 (15.26%)		Less than \$15,000:	5,280 (15.3%)	
9th through 12th Grade:	4,019 (11.65%)		\$15,000 - \$25,000:	1,555 (8.97%)	
High School Diploma:	9,799 (28.39%)		\$25,000 - \$50,000:	4,432 (25.56%)	
Some College/2-yr:	10,147 (29.4%)		\$50,000 - \$75,000:	3,044 (17.56%)	
B.S./B.A. or More:	5,280 (15.3%)		Greater than \$75,000:	6,521 (37.61%)	

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State of California
CIWMB 52
 (Rev 09/08)

California Integrated Waste Management Board
Disposal Facility Inspection Report

Blue or Black Ink Pen

Page 1 of 1

Enforcement Agency: Contra Costa LEA		For Official CIWMB Use Only	
FACILITY FILE NUMBER: (99-xx-9999)		INSPECTION DATE (MM/DD/YYYY)	
07 - A A - 0032		01/28/2011	
PROGRAM CODE (Select only one code)		Time In: 12:30 AM	
<input checked="" type="radio"/> LEA Periodic <input type="radio"/> CIWMB Closed Sites <input type="radio"/> CIWMB Focused <input type="radio"/> LEA Focused <input type="radio"/> CIWMB Enforcement Agent <input type="radio"/> CIWMB Periodic		Inspection Time 2.50 Hours	
Time Out: 3:00 PM		<input type="radio"/> Attachments On-File (Not Scanned)	
Facility Name Keller Canyon Landfill		Received By (Operator) Signature forwarded by mail to Michael Caprio	
Facility Location 901 Bailey Road, Pittsburg, CA 94565		Owner Signature (if present) Allied Waste Industries, Inc.	
Inspector William Eric Fung		Also Present (Name) T. Pattee - Allied Waste	
Inspector Signature <i>[Signature]</i>			

THE ABOVE FACILITY WAS INSPECTED FOR COMPLIANCE WITH APPLICABLE SECTIONS OF DIVISION 30 OF THE PUBLIC RESOURCES CODE (PRC), AND TITLE 14 AND TITLE 27 CALIFORNIA CODE OF REGULATIONS (CCR). THE STANDARDS BELOW ARE CONSIDERED IN COMPLIANCE UNLESS OTHERWISE MARKED WITH ONE OF THE FOLLOWING: V=VIOLATION A=AREA OF CONCERN

PERMITS	V	A	SPREADING/COMPACTING	V	A	CONTROLS	V	A
PRC 44004(a) - SIGNIFICANT CHANGE	<input type="radio"/>	<input type="radio"/>	20640 - SPREADING/COMPACTING	<input type="radio"/>	<input type="radio"/>	20840 - NOISE CONTROL	<input type="radio"/>	<input type="radio"/>
PRC 44014(b) - OPERATOR COMPLIES WITH TERMS AND CONDITIONS OF PERMIT	<input type="radio"/>	<input type="radio"/>	20650 - GRADING OF FILL SURFACES	<input type="radio"/>	<input type="radio"/>	20860 - TRAFFIC CONTROL	<input type="radio"/>	<input type="radio"/>
21640 - REVIEW OF PERMITS	<input type="radio"/>	<input type="radio"/>	20660 - STOCKPIILING	<input type="radio"/>	<input type="radio"/>	20870 - HAZARDOUS WASTES	<input type="radio"/>	<input type="radio"/>
21600 - REPORT OF DISP SITE INFORMATION	<input type="radio"/>	<input type="radio"/>	DAILY & INTERMEDIATE COVER			20880 - MEDICAL WASTES	<input type="radio"/>	<input type="radio"/>
LOCATION RESTRICTIONS			20670 - AVAILABILITY OF COVER MATERIAL	<input type="radio"/>	<input type="radio"/>	20890 - DEAD ANIMALS	<input type="radio"/>	<input type="radio"/>
20270 - AIRPORT SAFETY	<input type="radio"/>	<input type="radio"/>	20680 - DAILY COVER	<input type="radio"/>	<input type="radio"/>	20900 - AIR CRITERIA	<input type="radio"/>	<input type="radio"/>
OPERATING CRITERIA			20690 - ALTERNATIVE DAILY COVER	<input type="radio"/>	<input type="radio"/>	GAS MONITORING & CONTROL		
20510 - DISPOSAL SITE RECORDS	<input type="radio"/>	<input type="radio"/>	20695 - PERFORMANCE STANDARDS	<input type="radio"/>	<input type="radio"/>	20918 - EXEMPTIONS	<input type="radio"/>	<input type="radio"/>
20515 - MSWLF UNIT RECORDS	<input type="radio"/>	<input type="radio"/>	20700 - INTERMEDIATE COVER	<input type="radio"/>	<input type="radio"/>	20919 - GAS CONTROL	<input type="radio"/>	<input type="radio"/>
20517 - DOCUMENT APPROVALS/REQUIREMENTS	<input type="radio"/>	<input type="radio"/>	20688 - BENEFICIAL REUSE	<input type="radio"/>	<input type="radio"/>	20921 - GAS MONITORING & CONTROL	<input type="radio"/>	<input type="radio"/>
20520 - SIGNS	<input type="radio"/>	<input type="radio"/>	HANDLING, EQUIPMENT & MAINTENANCE			20937 - REPT & CONTROL/EXCESSIVE GAS CON	<input type="radio"/>	<input type="radio"/>
20530 - SITE SECURITY	<input type="radio"/>	<input type="radio"/>	20710 - SCAVENGING/SALVAGING/STORAGE	<input type="radio"/>	<input type="radio"/>	CLOSURE		
20540 - ROADS	<input type="radio"/>	<input type="radio"/>	20720 - NON-SALVAGEABLE ITEMS	<input type="radio"/>	<input type="radio"/>	21110 - TIME FRAMES FOR CLOSURE	<input type="radio"/>	<input type="radio"/>
20550 - SANITARY FACILITIES	<input type="radio"/>	<input type="radio"/>	20730 - VOLUME REDUCTION/ENERGY RECOVERY	<input type="radio"/>	<input type="radio"/>	21780 - SUBMITTAL CLOSURE PLANS	<input type="radio"/>	<input type="radio"/>
20560 - DRINKING WATER SUPPLY	<input type="radio"/>	<input type="radio"/>	20740 - EQUIPMENT	<input type="radio"/>	<input type="radio"/>	TIRES		
20570 - COMMUNICATION FACILITIES	<input type="radio"/>	<input type="radio"/>	20750 - SITE MAINTENANCE	<input type="radio"/>	<input type="radio"/>	17351 - FIRE PREVENTION MEASURES	<input type="radio"/>	<input type="radio"/>
20580 - LIGHTING	<input type="radio"/>	<input type="radio"/>	CONTROLS			17352 - FACILITY ACCESS SECURITY	<input type="radio"/>	<input type="radio"/>
PERSONNEL			20780 - NUISANCE CONTROL	<input type="radio"/>	<input type="radio"/>	17353 - VECTOR CONTROL	<input type="radio"/>	<input type="radio"/>
20590 - PERSONNEL HEALTH & SAFETY	<input type="radio"/>	<input type="radio"/>	20770 - ANIMAL FEEDING	<input type="radio"/>	<input type="radio"/>	17354 - STORAGE	<input type="radio"/>	<input type="radio"/>
20610 - TRAINING	<input type="radio"/>	<input type="radio"/>	20780 - OPEN BURNING/BURNING WASTES	<input type="radio"/>	<input type="radio"/>	17355 - DISPOSAL	<input type="radio"/>	<input type="radio"/>
20615 - SUPERVISION	<input type="radio"/>	<input type="radio"/>	20790 - LEACHATE CONTROL	<input type="radio"/>	<input type="radio"/>	17356 - INDOOR STORAGE	<input type="radio"/>	<input type="radio"/>
20620 - SITE ATTENDANT	<input type="radio"/>	<input type="radio"/>	20800 - DUST CONTROL	<input type="radio"/>	<input type="radio"/>	OTHER		
CONFINED UNLOADING			20810 - VECTOR AND BIRD CONTROL	<input type="radio"/>	<input type="radio"/>		<input type="radio"/>	<input type="radio"/>
20630 - CONFINED UNLOADING	<input type="radio"/>	<input type="radio"/>	20820 - DRAINAGE & EROSION CONTROL	<input type="radio"/>	<input type="radio"/>		<input type="radio"/>	<input type="radio"/>
			20830 - LITTER CONTROL	<input type="radio"/>	<input type="radio"/>		<input type="radio"/>	<input type="radio"/>

Comments: (Note: for additional or continued comments use the CIWMB 03 or attach additional pages.)

- 1) A review of records was conducted with Todd Pattee. Records reviewed included daily tonnage, special occurrences, manifests, radiation monitoring logs, load screening, site inspection logs (daily, weekly, & monthly), waste discrepancy logs, waste receipts, weather records, employee training, flare logs, fire pump house log, SWPPP, SPCC, wet season run off monitoring, etc.
- 2) Hazardous waste storage. Accumulation dates - Waste Oil 1/24/11 Antifreeze 4/22/10, Used Oil Filter Drums 6/16/10, 10/25/10, & 12/22/10.
- 3) There were 4 batteries in the storage locker at the time of inspection.
- 4) Radiation Monitor calibration 12/31, 1-8, 1/15, 1/19, & 1/22.
- 5) Performed drive through neighborhood immediately north of facility as a routine check with Todd Pattee. No odors detected during that survey.

INSTRUCTIONS ON BACK

Correct: ☒ Incorrect: ☐ ☐ ☐

EXAMPLE 1 2 3

Top White - CIWMB

Middle Pink - LEA

Bottom Yellow - Operator

State of California
CIWMB 52
(Rev 09/08)

California Integrated Waste Management Board
Disposal Facility Inspection Report

Page 1 of 1

Enforcement Agency: Contra Costa LEA		For Official CIWMB Use Only Received Date: MAY 18 2011	
FACILITY FILE NUMBER (99-xx-9999) 07 - A A - 0032		INSPECTION DATE (MM/DD/YYYY) 03/22/2011	
PROGRAM CODE (Select only one code) <input checked="" type="radio"/> LEA Periodic <input type="radio"/> CIWMB Closed Sites <input type="radio"/> CIWMB Focused <input type="radio"/> LEA Focused <input type="radio"/> CIWMB Enforcement Agent <input type="radio"/> CIWMB Periodic		Time In: 10:30 AM	Inspection Time 3.0 Hours
Time Out: 1:30 PM		Attachments: On File (Not Scanned)	
Facility Name Keller Canyon Landfill		Received By (Operator) Signature forwarded by mail to Michael Caprio	
Facility Location 901 Bailey Road, Pittsburg, CA 94565		Owner Signature (if present) Allied Waste Industries, Inc.	
Inspector William Eric Fung		Also Present (Name) T. Pattee - Allied Waste	
Inspector Signature <i>[Signature]</i>			

THE ABOVE FACILITY WAS INSPECTED FOR COMPLIANCE WITH APPLICABLE SECTIONS OF DIVISION 30 OF THE PUBLIC RESOURCES CODE (PRC), AND TITLE 14 AND TITLE 27 CALIFORNIA CODE OF REGULATIONS (CCR). THE STANDARDS BELOW ARE CONSIDERED IN COMPLIANCE UNLESS OTHERWISE MARKED WITH ONE OF THE FOLLOWING: V=VIOLATION A=AREA OF CONCERN

PERMITS	V	A	SPREADING/COMPACTING	V	A	CONTROLS	V	A
PRC 44004(a) - SIGNIFICANT CHANGE	<input type="radio"/>	<input type="radio"/>	20640 - SPREADING/COMPACTING	<input type="radio"/>	<input type="radio"/>	20840 - NOISE CONTROL	<input type="radio"/>	<input type="radio"/>
PRC 44014(b) - OPERATOR COMPLIES WITH TERMS AND CONDITIONS OF PERMIT	<input type="radio"/>	<input type="radio"/>	20650 - GRADING OF FILL SURFACES	<input type="radio"/>	<input type="radio"/>	20860 - TRAFFIC CONTROL	<input type="radio"/>	<input type="radio"/>
21640 - REVIEW OF PERMITS	<input type="radio"/>	<input type="radio"/>	20660 - STOCKPILING	<input type="radio"/>	<input type="radio"/>	20870 - HAZARDOUS WASTES	<input type="radio"/>	<input type="radio"/>
21600 - REPORT OF DISP SITE INFORMATION	<input type="radio"/>	<input type="radio"/>	DAILY & INTERMEDIATE COVER			20880 - MEDICAL WASTES	<input type="radio"/>	<input type="radio"/>
LOCATION RESTRICTIONS			20670 - AVAILABILITY OF COVER MATERIAL	<input type="radio"/>	<input type="radio"/>	20890 - DEAD ANIMALS	<input type="radio"/>	<input type="radio"/>
20270 - AIRPORT SAFETY	<input type="radio"/>	<input type="radio"/>	20680 - DAILY COVER	<input type="radio"/>	<input type="radio"/>	20900 - AIR CRITERIA	<input type="radio"/>	<input type="radio"/>
OPERATING CRITERIA			20690 - ALTERNATIVE DAILY COVER	<input type="radio"/>	<input type="radio"/>	GAS MONITORING & CONTROL		
20510 - DISPOSAL SITE RECORDS	<input type="radio"/>	<input type="radio"/>	20695 - PERFORMANCE STANDARDS	<input type="radio"/>	<input type="radio"/>	20918 - EXEMPTIONS	<input type="radio"/>	<input type="radio"/>
20515 - MSWLF UNIT RECORDS	<input type="radio"/>	<input type="radio"/>	20700 - INTERMEDIATE COVER	<input type="radio"/>	<input type="radio"/>	20919 - GAS CONTROL	<input type="radio"/>	<input type="radio"/>
20517 - DOCUMENT APPROVALS/REQUIREMENTS	<input type="radio"/>	<input type="radio"/>	20686 - BENEFICIAL REUSE	<input type="radio"/>	<input type="radio"/>	20921 - GAS MONITORING & CONTROL	<input checked="" type="radio"/>	<input type="radio"/>
20520 - SIGNS	<input type="radio"/>	<input type="radio"/>	HANDLING, EQUIPMENT & MAINTENANCE			20937 - REPT & CONTROL/EXCESSIVE GAS CON	<input type="radio"/>	<input type="radio"/>
20530 - SITE SECURITY	<input type="radio"/>	<input type="radio"/>	20710 - SCAVENGING/SALVAGING/STORAGE	<input type="radio"/>	<input type="radio"/>	CLOSURE		
20540 - ROADS	<input type="radio"/>	<input type="radio"/>	20720 - NON-SALVAGEABLE ITEMS	<input type="radio"/>	<input type="radio"/>	21110 - TIME FRAMES FOR CLOSURE	<input type="radio"/>	<input type="radio"/>
20550 - SANITARY FACILITIES	<input type="radio"/>	<input type="radio"/>	20730 - VOLUME REDUCTION/ENERGY RECOVERY	<input type="radio"/>	<input type="radio"/>	21780 - SUBMITTAL CLOSURE PLANS	<input type="radio"/>	<input type="radio"/>
20560 - DRINKING WATER SUPPLY	<input type="radio"/>	<input type="radio"/>	20740 - EQUIPMENT	<input type="radio"/>	<input type="radio"/>	TIRES		
20570 - COMMUNICATION FACILITIES	<input type="radio"/>	<input type="radio"/>	20750 - SITE MAINTENANCE	<input type="radio"/>	<input type="radio"/>	17351 - FIRE PREVENTION MEASURES	<input type="radio"/>	<input type="radio"/>
20580 - LIGHTING	<input type="radio"/>	<input type="radio"/>	CONTROLS			17352 - FACILITY ACCESS SECURITY	<input type="radio"/>	<input type="radio"/>
PERSONNEL			20760 - NUISANCE CONTROL	<input type="radio"/>	<input type="radio"/>	17353 - VECTOR CONTROL	<input type="radio"/>	<input type="radio"/>
20590 - PERSONNEL HEALTH & SAFETY	<input type="radio"/>	<input type="radio"/>	20770 - ANIMAL FEEDING	<input type="radio"/>	<input type="radio"/>	17354 - STORAGE	<input type="radio"/>	<input type="radio"/>
20610 - TRAINING	<input type="radio"/>	<input type="radio"/>	20780 - OPEN BURNING/BURNING WASTES	<input type="radio"/>	<input type="radio"/>	17355 - DISPOSAL	<input type="radio"/>	<input type="radio"/>
20615 - SUPERVISION	<input type="radio"/>	<input type="radio"/>	20790 - LEACHATE CONTROL	<input type="radio"/>	<input type="radio"/>	17356 - INDOOR STORAGE	<input type="radio"/>	<input type="radio"/>
20620 - SITE ATTENDANT	<input type="radio"/>	<input type="radio"/>	20800 - DUST CONTROL	<input type="radio"/>	<input type="radio"/>	OTHER		
CONFINED UNLOADING			20810 - VECTOR AND BIRD CONTROL	<input type="radio"/>	<input type="radio"/>		<input type="radio"/>	<input type="radio"/>
20630 - CONFINED UNLOADING	<input type="radio"/>	<input type="radio"/>	20820 - DRAINAGE & EROSION CONTROL	<input type="radio"/>	<input type="radio"/>		<input type="radio"/>	<input type="radio"/>
			20830 - LITTER CONTROL	<input type="radio"/>	<input type="radio"/>		<input type="radio"/>	<input type="radio"/>

Comments: (Note: for additional or continued comments use the CIWMB 03 or attach additional pages.)

- 1) Violation - 20921 Gas Monitoring and Control - Methane gas level at compliance perimeter probe MP-31A & MP-31B above the 5% permitted limit. MP-31A had readings of 44.2% on 2/7/11 and 43.9% on 2/16/11, MP-31B had readings of 13.3% on 2/7/11 and 15.2% on 2/16/11, according to facility methane gas monitoring reports. Facility to provide correction plan and take action to bring gas levels into compliance.
- 2) A review of records was conducted with Todd Pattee. Records reviewed included daily tonnage, special occurrences, manifests, radiation monitoring logs, load screening, site inspection logs (daily, weekly, & monthly), waste discrepancy logs, waste receipts, weather records, employee training, flare logs, fire pump house log, SWPPP, SPCC, wet season run off monitoring, etc.
- 3) Hazardous waste storage. Accumulation dates - Waste Oil 3/24/11 Antifreeze 4/22/10, Load Check Bin Empty, Used Oil Filter Drums 6/16/10, 3/2/11.
- 4) There were 0 batteries in the storage locker at the time of inspection.
- 5) Radiation Monitor calibration 2/26, 3/5, 3/12, & 3/19.

INSTRUCTIONS ON BACK

Correct: ☒ Incorrect: ☐ ☐ ☐

EXAMPLE 1 2 3

Top White - CIWMB

Middle Pink - LEA

Bottom Yellow - Operator

State of California
CIWMB 52
(Rev 09/08)

California Integrated Waste Management Board
Disposal Facility Inspection Report

Page 1 of 1

Enforcement Agency: Contra Costa LEA		For Official CIWMB Use Only	
Facility File Number: (99-xx-9999) 07-AA-0032		Inspection Date (MM/DD/YYYY) 04/26/2011	
PROGRAM CODE (Select only one code) <input type="radio"/> LEA Periodic <input type="radio"/> CIWMB Closed Sites <input type="radio"/> CIWMB Focused <input type="radio"/> LEA Focused <input type="radio"/> CIWMB Enforcement Agent <input type="radio"/> CIWMB Periodic		Time In: 10:00 AM Inspection Time: 2.0 Hours Time Out: 12:00 PM	
Facility Name Keller Canyon Landfill Facility Location 901 Bailey Road, Pittsburg, CA 94565		Received By (Operator) Signature forwarded by mail to Michael Caprio Owner Signature (if present) Allied Waste Industries, Inc. Also Present (Name) T. Pattee - Allied Waste	
Inspector William Eric Fung Inspector Signature			

THE ABOVE FACILITY WAS INSPECTED FOR COMPLIANCE WITH APPLICABLE SECTIONS OF DIVISION 3 OF THE PUBLIC RESOURCES CODE (PRC), AND TITLE 14 AND TITLE 27 CALIFORNIA CODE OF REGULATIONS (CCR). THE STANDARDS BELOW ARE CONSIDERED IN COMPLIANCE UNLESS OTHERWISE MARKED WITH ONE OF THE FOLLOWING: V=VIOLATION A=AREA OF CONCERN

PERMITS	V	A	SPREADING/COMPACTING	V	A	CONTROLS	V	A
PRC 44004(a) - SIGNIFICANT CHANGE	<input type="checkbox"/>	<input type="checkbox"/>	20840 - SPREADING/COMPACTING	<input type="checkbox"/>	<input type="checkbox"/>	20840 - NOISE CONTROL	<input type="checkbox"/>	<input type="checkbox"/>
PRC 44014(b) - OPERATOR COMPLIES WITH TERMS AND CONDITIONS OF PERMIT	<input type="checkbox"/>	<input type="checkbox"/>	20850 - GRADING OF FILL SURFACES	<input type="checkbox"/>	<input type="checkbox"/>	20860 - TRAFFIC CONTROL	<input type="checkbox"/>	<input type="checkbox"/>
21640 - REVIEW OF PERMITS	<input type="checkbox"/>	<input type="checkbox"/>	20860 - STOCKPILING	<input type="checkbox"/>	<input type="checkbox"/>	20870 - HAZARDOUS WASTES	<input type="checkbox"/>	<input type="checkbox"/>
21600 - REPORT OF DISP SITE INFORMATION	<input type="checkbox"/>	<input type="checkbox"/>	DAILY & INTERMEDIATE COVER	<input type="checkbox"/>	<input type="checkbox"/>	20880 - MEDICAL WASTES	<input type="checkbox"/>	<input type="checkbox"/>
LOCATION RESTRICTIONS			20670 - AVAILABILITY OF COVER MATERIAL	<input type="checkbox"/>	<input type="checkbox"/>	20890 - DEAD ANIMALS	<input type="checkbox"/>	<input type="checkbox"/>
20270 - AIRPORT SAFETY	<input type="checkbox"/>	<input type="checkbox"/>	20680 - DAILY COVER	<input type="checkbox"/>	<input type="checkbox"/>	20900 - AIR CRITERIA	<input type="checkbox"/>	<input type="checkbox"/>
OPERATING CRITERIA			20690 - ALTERNATIVE DAILY COVER	<input type="checkbox"/>	<input type="checkbox"/>	GAS MONITORING & CONTROL		
20510 - DISPOSAL SITE RECORDS	<input type="checkbox"/>	<input type="checkbox"/>	20695 - PERFORMANCE STANDARDS	<input type="checkbox"/>	<input type="checkbox"/>	20918 - EXEMPTIONS	<input type="checkbox"/>	<input type="checkbox"/>
20515 - MSWLF UNIT RECORDS	<input type="checkbox"/>	<input type="checkbox"/>	20700 - INTERMEDIATE COVER	<input type="checkbox"/>	<input type="checkbox"/>	20919 - GAS CONTROL	<input type="checkbox"/>	<input type="checkbox"/>
20517 - DOCUMENT APPROVALS/REQUIREMENTS	<input type="checkbox"/>	<input type="checkbox"/>	20686 - BENEFICIAL REUSE	<input type="checkbox"/>	<input type="checkbox"/>	20921 - GAS MONITORING & CONTROL	<input checked="" type="checkbox"/>	<input type="checkbox"/>
20520 - SIGNS	<input type="checkbox"/>	<input type="checkbox"/>	HANDLING, EQUIPMENT & MAINTENANCE			20937 - REPT & CONTROL/EXCESSIVE GAS CON	<input type="checkbox"/>	<input type="checkbox"/>
20530 - SITE SECURITY	<input type="checkbox"/>	<input type="checkbox"/>	20710 - SCAVENGING/SALVAGING/STORAGE	<input type="checkbox"/>	<input type="checkbox"/>	CLOSURE		
20540 - ROADS	<input type="checkbox"/>	<input type="checkbox"/>	20720 - NON-SALVAGEABLE ITEMS	<input type="checkbox"/>	<input type="checkbox"/>	21110 - TIME FRAMES FOR CLOSURE	<input type="checkbox"/>	<input type="checkbox"/>
20550 - SANITARY FACILITIES	<input type="checkbox"/>	<input type="checkbox"/>	20730 - VOLUME REDUCTION/ENERGY RECOVERY	<input type="checkbox"/>	<input type="checkbox"/>	21780 - SUBMITTAL CLOSURE PLANS	<input type="checkbox"/>	<input type="checkbox"/>
20560 - DRINKING WATER SUPPLY	<input type="checkbox"/>	<input type="checkbox"/>	20740 - EQUIPMENT	<input type="checkbox"/>	<input type="checkbox"/>	TIRES		
20570 - COMMUNICATION FACILITIES	<input type="checkbox"/>	<input type="checkbox"/>	20750 - SITE MAINTENANCE	<input type="checkbox"/>	<input type="checkbox"/>	17351 - FIRE PREVENTION MEASURES	<input type="checkbox"/>	<input type="checkbox"/>
20580 - LIGHTING	<input type="checkbox"/>	<input type="checkbox"/>	CONTROLS			17352 - FACILITY ACCESS SECURITY	<input type="checkbox"/>	<input type="checkbox"/>
PERSONNEL			20760 - NUISANCE CONTROL	<input type="checkbox"/>	<input type="checkbox"/>	17353 - VECTOR CONTROL	<input type="checkbox"/>	<input type="checkbox"/>
20590 - PERSONNEL HEALTH & SAFETY	<input type="checkbox"/>	<input type="checkbox"/>	20770 - ANIMAL FEEDING	<input type="checkbox"/>	<input type="checkbox"/>	17354 - STORAGE	<input type="checkbox"/>	<input type="checkbox"/>
20610 - TRAINING	<input type="checkbox"/>	<input type="checkbox"/>	20780 - OPEN BURNING/BURNING WASTES	<input type="checkbox"/>	<input type="checkbox"/>	17355 - DISPOSAL	<input type="checkbox"/>	<input type="checkbox"/>
20615 - SUPERVISION	<input type="checkbox"/>	<input type="checkbox"/>	20790 - LEACHATE CONTROL	<input type="checkbox"/>	<input type="checkbox"/>	17356 - INDOOR STORAGE	<input type="checkbox"/>	<input type="checkbox"/>
20620 - SITE ATTENDANT	<input type="checkbox"/>	<input type="checkbox"/>	20800 - DUST CONTROL	<input type="checkbox"/>	<input type="checkbox"/>	OTHER		
CONFINED UNLOADING			20810 - VECTOR AND BIRD CONTROL	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
20630 - CONFINED UNLOADING	<input type="checkbox"/>	<input type="checkbox"/>	20820 - DRAINAGE & EROSION CONTROL	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
			20830 - LITTER CONTROL	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>

Comments: (Note: for additional or continued comments use the CIWMB 03 or attach additional pages.)

- 1) Violation - 20921 Gas Monitoring and Control - Methane gas level at compliance perimeter probe MP-31A & MP-31B above the 5% permitted limit. MP-31A had readings of 50.7% on 3/30/11, MP-31B had readings of 24.2% on 3/31/11, according to facility methane gas monitoring reports. Facility contracted consultant to provide correction plan and take action to bring gas levels into compliance.
- 2) A review of records was conducted with Todd Pattee. Records reviewed included daily tonnage, special occurrences, manifests, radiation monitoring logs, load screening, site inspection logs (daily, weekly, & monthly), waste discrepancy logs, waste receipts, weather records, employee training, flare logs, fire pump house log, SWPPP, SPCC, wet season run off monitoring, etc.
- 3) Hazardous waste storage. Accumulation dates - Waste Oil 4/5/11 Antifreeze 4/22/10, Load Check Bin Empty, Used Oil Filter Drums 6/16/10, 3/2/11, 4/20/11.
- 4) There were 0 batteries in the storage locker at the time of inspection.
- 5) Radiation Monitor calibration 3/26, 4/2, & 4/9.
- 6) Training - Accidents and Intersections.

INSTRUCTIONS ON BACK

Correct: ☒ Incorrect: ☐

EXAMPLE 1 2 3

Top White - CIWMB

Middle Pink - LEA

Bottom Yellow - Operator

WILLIAM B. WALKER, M.D.
HEALTH SERVICES DIRECTOR

RANDALL L. SAWYER
CHIEF ENVIRONMENTAL HEALTH & HAZMAT OFFICER

MARILYN C. UNDERWOOD, PH.D. REHS
DIRECTOR OF ENVIRONMENTAL HEALTH



11131230002

CONTRA COSTA
ENVIRONMENTAL HEALTH

2120 Diamond Blvd., Suite 200
Concord, California 94520
Ph (925) 692-2500
Fax (925) 692-2502
www.cocoeh.org

April 27, 2011

Keller Canyon Landfill Company
Attn: Michael Caprio
901 Bailey Road
Pittsburg, CA 94565

Subject: Facility Number – 07-AA-0032
Keller Canyon Landfill – LEA Inspection Report

Dear Mr. Caprio:

An inspection of the Keller Canyon Landfill was conducted on **April 26, 2011**, to ensure compliance with the Public Resources Code, Title 27 of the California Code of Regulations, the Solid Waste Facilities Permit, and other applicable codes and regulations within the purview of the Contra Costa Environmental Health Solid Waste Unit/Local Enforcement Agency (LEA). A copy of the inspection report is enclosed for your records.

Should you have any questions regarding the report, you may contact me at (925) 692-2538.

Sincerely,

William Eric Fung, R.E.H.S.
Environmental Health Specialist II

Enclosure

cc: Joe Doser, Supervising Environmental Health Specialist
Beatrice Poroli, CalRecycle
Laura Sullivan, CalRecycle
Lochlin Caffey, Keller Canyon Landfill Company
Keith Roberson, Regional Water Quality Control Board – SF Bay Region
Matt Rodriquez, City of Pittsburg

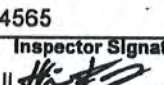
WEF:lj



State of California
CIWMB 52
 (Rev 09/08)

California Integrated Waste Management Board
Disposal Facility Inspection Report

Page 1 of 2

Enforcement Agency: Contra Costa LEA		For Official CIWMB Use Only	
FACILITY FILE NUMBER: (99-xx-9999) 07 - AA - 0032		INSPECTION DATE (MM/DD/YYYY) 05/20/2011	
PROGRAM CODE (Select only one code) <input checked="" type="radio"/> LEA Periodic <input type="radio"/> CIWMB Closed Sites <input type="radio"/> CIWMB Focused <input type="radio"/> LEA Focused <input type="radio"/> CIWMB Enforcement Agent <input type="radio"/> CIWMB Periodic		Time In: 10:00 AM Inspection Time Time Out: 1:00 PM 3.0 Hours	
Facility Name Keller Canyon Landfill		Received By (Operator) Signature forwarded by mail to Michael Caprio	
Facility Location 901 Bailey Road, Pittsburg, CA 94565		Owner Signature (if present) Allied Waste Industries, Inc.	
Inspector William Eric Fung		Also Present (Name) T. Pattee - Allied Waste	
Inspector Signature 			

THE ABOVE FACILITY WAS INSPECTED FOR COMPLIANCE WITH APPLICABLE SECTIONS OF DIVISION 2 OF THE PUBLIC RESOURCES CODE (PRC), AND TITLE 14 AND TITLE 27 CALIFORNIA CODE OF REGULATIONS (CCR). THE STANDARDS BELOW ARE CONSIDERED IN COMPLIANCE UNLESS OTHERWISE MARKED WITH ONE OF THE FOLLOWING: V=VIOLATION A=AREA OF CONCERN

PERMITS	V	A	SPREADING/COMPACTING	V	A	CONTROLS	V	A
PRC 44004(a) - SIGNIFICANT CHANGE	<input type="checkbox"/>	<input type="checkbox"/>	20640 - SPREADING/COMPACTING	<input type="checkbox"/>	<input type="checkbox"/>	20840 - NOISE CONTROL	<input type="checkbox"/>	<input type="checkbox"/>
PRC 44014(b) - OPERATOR COMPLIES WITH TERMS AND CONDITIONS OF PERMIT	<input type="checkbox"/>	<input type="checkbox"/>	20650 - GRADING OF FILL SURFACES	<input type="checkbox"/>	<input type="checkbox"/>	20860 - TRAFFIC CONTROL	<input type="checkbox"/>	<input type="checkbox"/>
21640 - REVIEW OF PERMITS	<input type="checkbox"/>	<input type="checkbox"/>	20660 - STOCKPILING	<input type="checkbox"/>	<input type="checkbox"/>	20870 - HAZARDOUS WASTES	<input type="checkbox"/>	<input type="checkbox"/>
21600 - REPORT OF DISP SITE INFORMATION	<input type="checkbox"/>	<input type="checkbox"/>	DAILY & INTERMEDIATE COVER	<input type="checkbox"/>	<input type="checkbox"/>	20880 - MEDICAL WASTES	<input type="checkbox"/>	<input type="checkbox"/>
LOCATION RESTRICTIONS	<input type="checkbox"/>	<input type="checkbox"/>	20670 - AVAILABILITY OF COVER MATERIAL	<input type="checkbox"/>	<input type="checkbox"/>	20890 - DEAD ANIMALS	<input type="checkbox"/>	<input type="checkbox"/>
20270 - AIRPORT SAFETY	<input type="checkbox"/>	<input type="checkbox"/>	20680 - DAILY COVER	<input type="checkbox"/>	<input type="checkbox"/>	20900 - AIR CRITERIA	<input type="checkbox"/>	<input type="checkbox"/>
OPERATING CRITERIA	<input type="checkbox"/>	<input type="checkbox"/>	20690 - ALTERNATIVE DAILY COVER	<input type="checkbox"/>	<input type="checkbox"/>	GAS MONITORING & CONTROL	<input type="checkbox"/>	<input type="checkbox"/>
20510 - DISPOSAL SITE RECORDS	<input type="checkbox"/>	<input type="checkbox"/>	20695 - PERFORMANCE STANDARDS	<input type="checkbox"/>	<input type="checkbox"/>	20918 - EXEMPTIONS	<input type="checkbox"/>	<input type="checkbox"/>
20515 - MSWLF UNIT RECORDS	<input type="checkbox"/>	<input type="checkbox"/>	20700 - INTERMEDIATE COVER	<input type="checkbox"/>	<input type="checkbox"/>	20919 - GAS CONTROL	<input type="checkbox"/>	<input type="checkbox"/>
20517 - DOCUMENT APPROVALS/REQUIREMENTS	<input type="checkbox"/>	<input type="checkbox"/>	20686 - BENEFICIAL REUSE	<input type="checkbox"/>	<input type="checkbox"/>	20921 - GAS MONITORING & CONTROL	<input checked="" type="checkbox"/>	<input type="checkbox"/>
20520 - SIGNS	<input type="checkbox"/>	<input type="checkbox"/>	HANDLING, EQUIPMENT & MAINTENANCE	<input type="checkbox"/>	<input type="checkbox"/>	20937 - REPT & CONTROL/EXCESSIVE GAS CON	<input checked="" type="checkbox"/>	<input type="checkbox"/>
20530 - SITE SECURITY	<input type="checkbox"/>	<input type="checkbox"/>	20710 - SCAVENGING/SALVAGING/STORAGE	<input type="checkbox"/>	<input type="checkbox"/>	CLOSURE	<input type="checkbox"/>	<input type="checkbox"/>
20540 - ROADS	<input type="checkbox"/>	<input type="checkbox"/>	20720 - NON-SALVAGEABLE ITEMS	<input type="checkbox"/>	<input type="checkbox"/>	21110 - TIME FRAMES FOR CLOSURE	<input type="checkbox"/>	<input type="checkbox"/>
20550 - SANITARY FACILITIES	<input type="checkbox"/>	<input type="checkbox"/>	20730 - VOLUME REDUCTION/ENERGY RECOVERY	<input type="checkbox"/>	<input type="checkbox"/>	21780 - SUBMITTAL CLOSURE PLANS	<input type="checkbox"/>	<input type="checkbox"/>
20560 - DRINKING WATER SUPPLY	<input type="checkbox"/>	<input type="checkbox"/>	20740 - EQUIPMENT	<input type="checkbox"/>	<input type="checkbox"/>	TIRES	<input type="checkbox"/>	<input type="checkbox"/>
20570 - COMMUNICATION FACILITIES	<input type="checkbox"/>	<input type="checkbox"/>	20750 - SITE MAINTENANCE	<input type="checkbox"/>	<input type="checkbox"/>	17351 - FIRE PREVENTION MEASURES	<input type="checkbox"/>	<input type="checkbox"/>
20580 - LIGHTING	<input type="checkbox"/>	<input type="checkbox"/>	CONTROLS	<input type="checkbox"/>	<input type="checkbox"/>	17352 - FACILITY ACCESS SECURITY	<input type="checkbox"/>	<input type="checkbox"/>
PERSONNEL	<input type="checkbox"/>	<input type="checkbox"/>	20760 - NUISANCE CONTROL	<input type="checkbox"/>	<input type="checkbox"/>	17353 - VECTOR CONTROL	<input type="checkbox"/>	<input type="checkbox"/>
20590 - PERSONNEL HEALTH & SAFETY	<input type="checkbox"/>	<input type="checkbox"/>	20770 - ANIMAL FEEDING	<input type="checkbox"/>	<input type="checkbox"/>	17354 - STORAGE	<input type="checkbox"/>	<input type="checkbox"/>
20610 - TRAINING	<input type="checkbox"/>	<input type="checkbox"/>	20780 - OPEN BURNING/BURNING WASTES	<input type="checkbox"/>	<input type="checkbox"/>	17355 - DISPOSAL	<input type="checkbox"/>	<input type="checkbox"/>
20615 - SUPERVISION	<input type="checkbox"/>	<input type="checkbox"/>	20790 - LEACHATE CONTROL	<input type="checkbox"/>	<input type="checkbox"/>	17356 - INDOOR STORAGE	<input type="checkbox"/>	<input type="checkbox"/>
20620 - SITE ATTENDANT	<input type="checkbox"/>	<input type="checkbox"/>	20800 - DUST CONTROL	<input type="checkbox"/>	<input type="checkbox"/>	OTHER	<input type="checkbox"/>	<input type="checkbox"/>
CONFINED UNLOADING	<input type="checkbox"/>	<input type="checkbox"/>	20810 - VECTOR AND BIRD CONTROL	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
20630 - CONFINED UNLOADING	<input type="checkbox"/>	<input type="checkbox"/>	20820 - DRAINAGE & EROSION CONTROL	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
			20830 - LITTER CONTROL	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>

Comments: (Note: for additional or continued comments use the CIWMB 03 or attach additional pages.)

- 1) Violation - 20921 Gas Monitoring and Control - Methane gas level at compliance perimeter probe MP-31A & MP-31B above the 5% permitted limit. MP-31A had readings of 44.2% on 2/7/11 and 43.9% on 2/16/11, MP-31B had readings of 13.3% on 2/7/11 and 15.2% on 2/16/11, according to facility methane gas monitoring reports. Facility to provide correction plan and take action to bring gas levels into compliance.
- 2) Violation - 20937 Reporting and Control of Excessive Gas Concentration - Remediation plans to be submitted and approved by LEA and CalRecycle
- 3) A review of records was conducted with Todd Pattee. Records reviewed included daily tonnage, special occurrences, manifests, radiation monitoring logs, load screening, site inspection logs (daily, weekly, & monthly), waste discrepancy logs, waste receipts, weather records, employee training, flare logs, fire pump house log, SWPPP, SPCC, wet season run off monitoring, etc.
- 4) Hazardous waste storage. Accumulation dates - Waste Oil 4/29/11 Antifreeze 4/29/10, Load Check Bin Empty, Used Oil Filter Drums 6/16/10, 5/5/11, 4/20/11.
- 5) There were 0 batteries in the storage locker at the time of inspection.
- 6) Radiation Monitor calibration 4/16, 4/23, 5/7, & 5/14.

INSTRUCTIONS ON BACK

Correct: ☒ Incorrect: ☐

EXAMPLE 1 2 3

Top White - CIWMB

Middle Pink - LEA

Bottom Yellow - Operator

11173230001

CIWMB Form 52 - Disposal Facility Inspection Report

Enforcement Agency: Contra Costa LEA

Page 2 of 2

Facility Name: Keller Canyon Landfill

Facility File Number: 07-AA-0032

Inspection Date: 05/20/2011

Comments Continued:

7) Training - Heat Stress and Ladder Safety.

WILLIAM B. WALKER, M.D.
HEALTH SERVICES DIRECTOR

RANDALL L. SAWYER
CHIEF ENVIRONMENTAL HEALTH & HAZMAT OFFICER

MARILYN C. UNDERWOOD, PHD. REHS
DIRECTOR OF ENVIRONMENTAL HEALTH



11173230001

CONTRA COSTA
ENVIRONMENTAL HEALTH

2120 Diamond Blvd., Suite 200

Concord, California 94520

Ph (925) 692-2500

Fax (925) 692-2502

www.cocoeh.org

June 13, 2011

Keller Canyon Landfill Company
Attn: Michael Caprio
901 Bailey Road
Pittsburg, CA 94565

Subject: *Facility Number – 07-AA-0032*
 Keller Canyon Landfill – LEA Inspection Report

Dear Mr. Caprio:

An inspection of the Keller Canyon Landfill was conducted on **May 20, 2011**, to ensure compliance with the Public Resources Code, Title 27 of the California Code of Regulations, the Solid Waste Facilities Permit, and other applicable codes and regulations within the purview of the Contra Costa Environmental Health Solid Waste Unit/Local Enforcement Agency (LEA). A copy of the inspection report is enclosed for your records.

Should you have any questions regarding the report, you may contact me at (925) 692-2538.

Sincerely,

William Eric Fung, R.E.H.S.
Environmental Health Specialist II

Enclosure

cc: Joe Doser, Supervising Environmental Health Specialist
 Beatrice Poroli, CalRecycle
 Laura Sullivan, CalRecycle
 Lochlin Caffey, Keller Canyon Landfill Company
 Keith Roberson, Regional Water Quality Control Board – SF Bay Region
 Matt Rodriquez, City of Pittsburg

WEF:lj



11194230004

State of California
CIWMB 52
 (Rev 09/08)

California Integrated Waste Management Board
Disposal Facility Inspection Report

Blue or Black Ink Pen

Page 1 of 1

Enforcement Agency: Contra Costa LEA		For Official CIWMB Use Only	
FACILITY FILE NUMBER: (99-xx-9999) 07 - A A - 0032		INSPECTION DATE (MM/DD/YYYY) 06/27/2011	
PROGRAM CODE (Select only one code) <input checked="" type="radio"/> LEA Periodic <input type="radio"/> CIWMB Closed Sites <input type="radio"/> CIWMB Focused <input type="radio"/> LEA Focused <input type="radio"/> CIWMB Enforcement Agent <input type="radio"/> CIWMB Periodic		Time In: 9:30 AM	Inspection Time 2.5 Hours
Facility Name Keller Canyon Landfill		Received By (Operator) Signature forwarded by mail to Michael Caprio	
Facility Location 901 Bailey Road, Pittsburg, CA 94565		Owner Signature (if present) Allied Waste Industries, Inc.	
Inspector William Eric Fung		Also Present (Name) T. Pattee - Allied Waste	
Inspector Signature 		By <input type="checkbox"/> Attachments On File (Not Scanned)	

THE ABOVE FACILITY WAS INSPECTED FOR COMPLIANCE WITH APPLICABLE SECTIONS OF DIVISION 30 OF THE PUBLIC RESOURCES CODE (PRC), AND TITLE 14 AND TITLE 27 CALIFORNIA CODE OF REGULATIONS (CCR). THE STANDARDS BELOW ARE CONSIDERED IN COMPLIANCE UNLESS OTHERWISE MARKED WITH ONE OF THE FOLLOWING: V=VIOLATION A=AREA OF CONCERN

PERMITS	V	A	SPREADING/COMPACTING	V	A	CONTROLS	V	A
PRC 44004(a) - SIGNIFICANT CHANGE	<input type="radio"/>	<input type="radio"/>	20640 - SPREADING/COMPACTING	<input type="radio"/>	<input type="radio"/>	20840 - NOISE CONTROL	<input type="radio"/>	<input type="radio"/>
PRC 44014(b) - OPERATOR COMPLIES WITH TERMS AND CONDITIONS OF PERMIT	<input type="radio"/>	<input type="radio"/>	20650 - GRADING OF FILL SURFACES	<input type="radio"/>	<input type="radio"/>	20860 - TRAFFIC CONTROL	<input type="radio"/>	<input type="radio"/>
21640 - REVIEW OF PERMITS	<input type="radio"/>	<input type="radio"/>	20660 - STOCKPILING	<input type="radio"/>	<input type="radio"/>	20870 - HAZARDOUS WASTES	<input type="radio"/>	<input type="radio"/>
21600 - REPORT OF DISP SITE INFORMATION	<input type="radio"/>	<input type="radio"/>	DAILY & INTERMEDIATE COVER	<input type="radio"/>	<input type="radio"/>	20880 - MEDICAL WASTES	<input type="radio"/>	<input type="radio"/>
LOCATION RESTRICTIONS	<input type="radio"/>	<input type="radio"/>	20670 - AVAILABILITY OF COVER MATERIAL	<input type="radio"/>	<input type="radio"/>	20890 - DEAD ANIMALS	<input type="radio"/>	<input type="radio"/>
20270 - AIRPORT SAFETY	<input type="radio"/>	<input type="radio"/>	20680 - DAILY COVER	<input type="radio"/>	<input type="radio"/>	20900 - AIR CRITERIA	<input type="radio"/>	<input type="radio"/>
OPERATING CRITERIA	<input type="radio"/>	<input type="radio"/>	20690 - ALTERNATIVE DAILY COVER	<input type="radio"/>	<input type="radio"/>	GAS MONITORING & CONTROL	<input type="radio"/>	<input type="radio"/>
20510 - DISPOSAL SITE RECORDS	<input type="radio"/>	<input type="radio"/>	20695 - PERFORMANCE STANDARDS	<input type="radio"/>	<input type="radio"/>	20918 - EXEMPTIONS	<input type="radio"/>	<input type="radio"/>
20515 - MSWLF UNIT RECORDS	<input type="radio"/>	<input type="radio"/>	20700 - INTERMEDIATE COVER	<input type="radio"/>	<input type="radio"/>	20919 - GAS CONTROL	<input type="radio"/>	<input type="radio"/>
20517 - DOCUMENT APPROVALS/REQUIREMENTS	<input type="radio"/>	<input type="radio"/>	20686 - BENEFICIAL REUSE	<input type="radio"/>	<input type="radio"/>	20921 - GAS MONITORING & CONTROL	<input type="radio"/>	<input type="radio"/>
20520 - SIGNS	<input type="radio"/>	<input type="radio"/>	HANDLING EQUIPMENT & MAINTENANCE	<input type="radio"/>	<input type="radio"/>	20937 - REPT & CONTROL/EXCESSIVE GAS CON	<input checked="" type="radio"/>	<input type="radio"/>
20530 - SITE SECURITY	<input type="radio"/>	<input type="radio"/>	20710 - SCAVENGING/SALVAGING/STORAGE	<input type="radio"/>	<input type="radio"/>	CLOSURE	<input type="radio"/>	<input type="radio"/>
20540 - ROADS	<input type="radio"/>	<input type="radio"/>	20720 - NON-SALVAGEABLE ITEMS	<input type="radio"/>	<input type="radio"/>	21110 - TIME FRAMES FOR CLOSURE	<input type="radio"/>	<input type="radio"/>
20550 - SANITARY FACILITIES	<input type="radio"/>	<input type="radio"/>	20730 - VOLUME REDUCTION/ENERGY RECOVERY	<input type="radio"/>	<input type="radio"/>	21780 - SUBMITTAL CLOSURE PLANS	<input type="radio"/>	<input type="radio"/>
20560 - DRINKING WATER SUPPLY	<input type="radio"/>	<input type="radio"/>	20740 - EQUIPMENT	<input type="radio"/>	<input type="radio"/>	TIRES	<input type="radio"/>	<input type="radio"/>
20570 - COMMUNICATION FACILITIES	<input type="radio"/>	<input type="radio"/>	20750 - SITE MAINTENANCE	<input type="radio"/>	<input type="radio"/>	17351 - FIRE PREVENTION MEASURES	<input type="radio"/>	<input type="radio"/>
20580 - LIGHTING	<input type="radio"/>	<input type="radio"/>	CONTROLS	<input type="radio"/>	<input type="radio"/>	17352 - FACILITY ACCESS SECURITY	<input type="radio"/>	<input type="radio"/>
PERSONNEL	<input type="radio"/>	<input type="radio"/>	20760 - NUISANCE CONTROL	<input type="radio"/>	<input type="radio"/>	17353 - VECTOR CONTROL	<input type="radio"/>	<input type="radio"/>
20590 - PERSONNEL HEALTH & SAFETY	<input type="radio"/>	<input type="radio"/>	20770 - ANIMAL FEEDING	<input type="radio"/>	<input type="radio"/>	17354 - STORAGE	<input type="radio"/>	<input type="radio"/>
20610 - TRAINING	<input type="radio"/>	<input type="radio"/>	20780 - OPEN BURNING/BURNING WASTES	<input type="radio"/>	<input type="radio"/>	17355 - DISPOSAL	<input type="radio"/>	<input type="radio"/>
20615 - SUPERVISION	<input type="radio"/>	<input type="radio"/>	20790 - LEACHATE CONTROL	<input type="radio"/>	<input type="radio"/>	17356 - INDOOR STORAGE	<input type="radio"/>	<input type="radio"/>
20620 - SITE ATTENDANT	<input type="radio"/>	<input type="radio"/>	20800 - DUST CONTROL	<input type="radio"/>	<input type="radio"/>	OTHER	<input type="radio"/>	<input type="radio"/>
CONFINED UNLOADING	<input type="radio"/>	<input type="radio"/>	20810 - VECTOR AND BIRD CONTROL	<input type="radio"/>	<input type="radio"/>		<input type="radio"/>	<input type="radio"/>
20630 - CONFINED UNLOADING	<input type="radio"/>	<input type="radio"/>	20820 - DRAINAGE & EROSION CONTROL	<input type="radio"/>	<input type="radio"/>		<input type="radio"/>	<input type="radio"/>
			20830 - LITTER CONTROL	<input type="radio"/>	<input type="radio"/>		<input type="radio"/>	<input type="radio"/>

Comments: (Note: for additional or continued comments use the CIWMB 03 or attach additional pages.)

- 1) Violation - 20937, Receipt of control plan for excessive gas. Submit corrective plans for control of excessive gas to LEA and CalRecycle for approval.
- 2) A review of records was conducted with Todd Pattee. Records reviewed included daily tonnage, special occurrences, manifests, radiation monitoring logs, load screening, site inspection logs (daily, weekly, & monthly), waste discrepancy logs, waste receipts, weather records, employee training, flare logs, fire pump house log, SWPPP, SPCC, wet season run off monitoring, etc.
- 3) Hazardous waste storage. Accumulation dates - Waste Oil 6/14/11 Antifreeze 4/29/10, Load Check Bin Empty, Used Oil Filter Drums 6/16/10, 5/5/11, 4/20/11.
- 4) There were 0 batteries in the storage locker at the time of inspection.
- 5) Radiation Monitor calibration 5/28, 6/4, 6/11, 6/18, & 6/25.

INSTRUCTIONS ON BACK

Correct: ☒ Incorrect: ☐

EXAMPLE 123

Top White - CIWMB

Middle Pink - LEA

Bottom Yellow - Operator

11194230004

WILLIAM B. WALKER, M.D.
HEALTH SERVICES DIRECTOR

RANDALL L. SAWYER
CHIEF ENVIRONMENTAL HEALTH & HAZMAT OFFICER

MARILYN C. UNDERWOOD, PH.D. REHS
DIRECTOR OF ENVIRONMENTAL HEALTH



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ENVIRONMENTAL HEALTH

2120 Diamond Blvd., Suite 200
Concord, California 94520
Ph (925) 692-2500
Fax (925) 692-2502
www.cocoeh.org

June 30, 2011

Keller Canyon Landfill Company
Attn: Michael Caprio
901 Bailey Road
Pittsburg, CA 94565

Subject: Facility Number – 07-AA-0032
Keller Canyon Landfill – LEA Inspection Report

Dear Mr. Caprio:

An inspection of the Keller Canyon Landfill was conducted on **June 27, 2011**, to ensure compliance with the Public Resources Code, Title 27 of the California Code of Regulations, the Solid Waste Facilities Permit, and other applicable codes and regulations within the purview of the Contra Costa Environmental Health Solid Waste Unit/Local Enforcement Agency (LEA). A copy of the inspection report is enclosed for your records.

Should you have any questions regarding the report, you may contact me at (925) 692-2538.

Sincerely,

William Eric Fung, R.E.H.S.
Environmental Health Specialist II

Enclosure

cc: Joe Doser, Supervising Environmental Health Specialist
Beatrice Poroli, CalRecycle
Laura Sullivan, CalRecycle
Lochlin Caffey, Keller Canyon Landfill Company
Keith Roberson, Regional Water Quality Control Board – SF Bay Region
Matt Rodriguez, City of Pittsburg

WEF:lj



State of California
CIWMB 52
 (Rev 09/08)

California Integrated Waste Management Board
Disposal Facility Inspection Report

Blue or Black Ink Pen

Page 1 of 1

Enforcement Agency: Contra Costa LEA		For Official CIWMB Use Only Received Date: JUL 25 2011	
FACILITY/FILE NUMBER: (99-xx-9999) 07 - A A - 0032		INSPECTION DATE (MM/DD/YYYY) 07 / 13 / 2011	
PROGRAM CODE (Select only one code) <input checked="" type="radio"/> LEA Periodic <input type="radio"/> CIWMB Closed Sites <input type="radio"/> CIWMB Focused <input type="radio"/> LEA Focused <input type="radio"/> CIWMB Enforcement Agent <input type="radio"/> CIWMB Periodic		Time In: 10:15 AM Time Out: 1:15 PM	Inspection Time 3.0 Hours
Facility Name Keller Canyon Landfill		Received By (Operator) Signature forwarded by mail to Michael Caprio	
Facility Location 901 Bailey Road, Pittsburg, CA 94565		Owner Signature (if present) Allied Waste Industries, Inc.	
Inspector William Eric Fung		Also Present (Name) T. Pattee - Allied Waste	
Inspector Signature <i>[Signature]</i>			

THE ABOVE FACILITY WAS INSPECTED FOR COMPLIANCE WITH APPLICABLE SECTIONS OF DIVISION 30 OF THE PUBLIC RESOURCES CODE (PRC), AND TITLE 14 AND TITLE 27 CALIFORNIA CODE OF REGULATIONS (CCR). THE STANDARDS BELOW ARE CONSIDERED IN COMPLIANCE UNLESS OTHERWISE MARKED WITH ONE OF THE FOLLOWING: V=VIOLATION A=AREA OF CONCERN

PERMITS	V	A	SPREADING/COMPACTING	V	A	CONTROLS	V	A
PRC 44004(a) - SIGNIFICANT CHANGE	<input type="radio"/>	<input type="radio"/>	20640 - SPREADING/COMPACTING	<input type="radio"/>	<input type="radio"/>	20840 - NOISE CONTROL	<input type="radio"/>	<input type="radio"/>
PRC 44014(b) - OPERATOR COMPLIES WITH TERMS AND CONDITIONS OF PERMIT	<input type="radio"/>	<input type="radio"/>	20650 - GRADING OF FILL SURFACES	<input type="radio"/>	<input type="radio"/>	20860 - TRAFFIC CONTROL	<input type="radio"/>	<input type="radio"/>
21640 - REVIEW OF PERMITS	<input type="radio"/>	<input type="radio"/>	20660 - STOCKPILING	<input type="radio"/>	<input type="radio"/>	20870 - HAZARDOUS WASTES	<input type="radio"/>	<input type="radio"/>
21600 - REPORT OF DISP SITE INFORMATION	<input type="radio"/>	<input type="radio"/>	DAILY & INTERMEDIATE COVER	<input type="radio"/>	<input type="radio"/>	20880 - MEDICAL WASTES	<input type="radio"/>	<input type="radio"/>
LOCATION RESTRICTIONS	<input type="radio"/>	<input type="radio"/>	20670 - AVAILABILITY OF COVER MATERIAL	<input type="radio"/>	<input type="radio"/>	20890 - DEAD ANIMALS	<input type="radio"/>	<input type="radio"/>
20270 - AIRPORT SAFETY	<input type="radio"/>	<input type="radio"/>	20680 - DAILY COVER	<input type="radio"/>	<input type="radio"/>	20900 - AIR CRITERIA	<input type="radio"/>	<input type="radio"/>
OPERATING CRITERIA	<input type="radio"/>	<input type="radio"/>	20690 - ALTERNATIVE DAILY COVER	<input type="radio"/>	<input type="radio"/>	GAS MONITORING & CONTROL	<input type="radio"/>	<input type="radio"/>
20510 - DISPOSAL SITE RECORDS	<input type="radio"/>	<input type="radio"/>	20695 - PERFORMANCE STANDARDS	<input type="radio"/>	<input type="radio"/>	20918 - EXEMPTIONS	<input type="radio"/>	<input type="radio"/>
20515 - MSWLF UNIT RECORDS	<input type="radio"/>	<input type="radio"/>	20700 - INTERMEDIATE COVER	<input type="radio"/>	<input type="radio"/>	20918 - GAS CONTROL	<input type="radio"/>	<input type="radio"/>
20517 - DOCUMENT APPROVALS/REQUIREMENTS	<input type="radio"/>	<input type="radio"/>	20685 - BENEFICIAL REUSE	<input type="radio"/>	<input type="radio"/>	20921 - GAS MONITORING & CONTROL	<input type="radio"/>	<input type="radio"/>
20520 - SIGNS	<input type="radio"/>	<input type="radio"/>	HANDLING/EQUIPMENT & MAINTENANCE	<input type="radio"/>	<input type="radio"/>	20937 - REPT & CONTROL/EXCESSIVE GAS CON	<input checked="" type="radio"/>	<input type="radio"/>
20530 - SITE SECURITY	<input type="radio"/>	<input type="radio"/>	20710 - SCAVENGING/SALVAGING/STORAGE	<input type="radio"/>	<input type="radio"/>	CLOSURE	<input type="radio"/>	<input type="radio"/>
20540 - ROADS	<input type="radio"/>	<input type="radio"/>	20720 - NON-SALVAGEABLE ITEMS	<input type="radio"/>	<input type="radio"/>	21110 - TIME FRAMES FOR CLOSURE	<input type="radio"/>	<input type="radio"/>
20550 - SANITARY FACILITIES	<input type="radio"/>	<input type="radio"/>	20730 - VOLUME REDUCTION/ENERGY RECOVERY	<input type="radio"/>	<input type="radio"/>	21780 - SUBMITTAL CLOSURE PLANS	<input type="radio"/>	<input type="radio"/>
20560 - DRINKING WATER SUPPLY	<input type="radio"/>	<input type="radio"/>	20740 - EQUIPMENT	<input type="radio"/>	<input type="radio"/>	TIRES	<input type="radio"/>	<input type="radio"/>
20570 - COMMUNICATION FACILITIES	<input type="radio"/>	<input type="radio"/>	20750 - SITE MAINTENANCE	<input type="radio"/>	<input type="radio"/>	17351 - FIRE PREVENTION MEASURES	<input type="radio"/>	<input type="radio"/>
20580 - LIGHTING	<input type="radio"/>	<input type="radio"/>	CONTROLS	<input type="radio"/>	<input type="radio"/>	17352 - FACILITY ACCESS SECURITY	<input type="radio"/>	<input type="radio"/>
PERSONNEL	<input type="radio"/>	<input type="radio"/>	20760 - NUISANCE CONTROL	<input type="radio"/>	<input type="radio"/>	17353 - VECTOR CONTROL	<input type="radio"/>	<input type="radio"/>
20590 - PERSONNEL HEALTH & SAFETY	<input type="radio"/>	<input type="radio"/>	20770 - ANIMAL FEEDING	<input type="radio"/>	<input type="radio"/>	17354 - STORAGE	<input type="radio"/>	<input type="radio"/>
20610 - TRAINING	<input type="radio"/>	<input type="radio"/>	20780 - OPEN BURNING/BURNING WASTES	<input type="radio"/>	<input type="radio"/>	17355 - DISPOSAL	<input type="radio"/>	<input type="radio"/>
20615 - SUPERVISION	<input type="radio"/>	<input type="radio"/>	20790 - LEACHATE CONTROL	<input type="radio"/>	<input type="radio"/>	17356 - INDOOR STORAGE	<input type="radio"/>	<input type="radio"/>
20620 - SITE ATTENDANT	<input type="radio"/>	<input type="radio"/>	20800 - DUST CONTROL	<input type="radio"/>	<input type="radio"/>	OTHER	<input type="radio"/>	<input type="radio"/>
CONFINED UNLOADING	<input type="radio"/>	<input type="radio"/>	20810 - VECTOR AND BIRD CONTROL	<input type="radio"/>	<input type="radio"/>		<input type="radio"/>	<input type="radio"/>
20630 - CONFINED UNLOADING	<input type="radio"/>	<input type="radio"/>	20820 - DRAINAGE & EROSION CONTROL	<input type="radio"/>	<input type="radio"/>		<input type="radio"/>	<input type="radio"/>
			20830 - LITTER CONTROL	<input type="radio"/>	<input type="radio"/>		<input type="radio"/>	<input type="radio"/>

Comments: (Note: for additional or continued comments use the CIWMB 03 or attach additional pages.)

- 1) Violation - 20937, Receipt of control plan for excessive gas. Submit corrective plans for control of excessive gas to LEA and CalRecycle for approval.
- 2) A review of records was conducted with Todd Pattee. Records reviewed included daily tonnage, special occurrences, manifests, radiation monitoring logs, load screening, site inspection logs (daily, weekly, & monthly), waste discrepancy logs, waste receipts, weather records, employee training, flare logs, fire pump house log, SWPPP, SPCC, wet season run off monitoring, etc.
- 3) Monthly Training - Roll Over & Handtools
- 4) Hazardous waste storage. Accumulation dates - Waste Oil 7/7/11 Antifreeze 4/29/10, Load Check Bin Empty, Used Oil Filter Drums 6/16/10, 5/5/11, 4/20/11.
- 5) There was 1 battery in the storage locker at the time of inspection.
- 6) Radiation Monitor calibration 6/25, 7/2, & 7/9.

INSTRUCTIONS ON BACK

Correct: ☒ Incorrect: ☐

EXAMPLE 1 2 3

Top White - CIWMB

Middle Pink - LEA

Bottom Yellow - Operator

State of California
CIWMB 52
(Rev 09/08)

California Integrated Waste Management Board
Disposal Facility Inspection Report

Page 1 of 1

Enforcement Agency: Contra Costa LEA		For Official CIWMB Use Only	
FACILITY FILE NUMBER: (99-xx-9999)		INSPECTION DATE (MM/DD/YYYY)	
07 - A A - 0032		11 / 24 / 2009	
PROGRAM CODE (Select only one code)		Time In: 11:00 AM	
<input checked="" type="radio"/> LEA Periodic <input type="radio"/> CIWMB Closed Sites <input type="radio"/> CIWMB Focused <input type="radio"/> LEA Focused <input type="radio"/> CIWMB Enforcement Agent <input type="radio"/> CIWMB Periodic		Inspection Time	
		Time Out: 1:00 AM	
		2.0 Hours	
Facility Name		Received By (Operator) Signature	
Keller Canyon Landfill		forwarded by mail to Michael Caprio	
Facility Location		Owner Signature (if present)	
901 Bailey Road, Pittsburg, CA 94565		Allied Waste Industries, Inc.	
Inspector		Also Present (Name)	
William Eric Fung		T. Pattee - Allied Waste	
Inspector Signature			

THE ABOVE FACILITY WAS INSPECTED FOR COMPLIANCE WITH APPLICABLE SECTIONS OF DIVISION 30 OF THE PUBLIC RESOURCES CODE (PRC), AND TITLE 14 AND TITLE 27 CALIFORNIA CODE OF REGULATIONS (CCR). THE STANDARDS BELOW ARE CONSIDERED IN COMPLIANCE UNLESS OTHERWISE MARKED WITH ONE OF THE FOLLOWING: V=VIOLATION A=AREA OF CONCERN

PERMITS	V	A	SPREADING/COMPACTING	V	A	CONTROLS	V	A
PRC 44004(a) - SIGNIFICANT CHANGE	<input type="radio"/>	<input type="radio"/>	20840 - SPREADING/COMPACTING	<input type="radio"/>	<input type="radio"/>	20840 - NOISE CONTROL	<input type="radio"/>	<input type="radio"/>
PRC 44014(b) - OPERATOR COMPLIES WITH TERMS AND CONDITIONS OF PERMIT	<input type="radio"/>	<input type="radio"/>	20850 - GRADING OF FILL SURFACES	<input type="radio"/>	<input type="radio"/>	20880 - TRAFFIC CONTROL	<input type="radio"/>	<input type="radio"/>
21840 - REVIEW OF PERMITS	<input type="radio"/>	<input type="radio"/>	20860 - STOCKPILING	<input type="radio"/>	<input type="radio"/>	20870 - HAZARDOUS WASTES	<input type="radio"/>	<input type="radio"/>
21600 - REPORT OF DISP SITE INFORMATION	<input type="radio"/>	<input checked="" type="radio"/>	DAILY & INTERMEDIATE COVER			20880 - MEDICAL WASTES	<input type="radio"/>	<input type="radio"/>
LOCATION RESTRICTIONS			20670 - AVAILABILITY OF COVER MATERIAL	<input type="radio"/>	<input type="radio"/>	20890 - DEAD ANIMALS	<input type="radio"/>	<input type="radio"/>
20270 - AIRPORT SAFETY	<input type="radio"/>	<input type="radio"/>	20880 - DAILY COVER	<input type="radio"/>	<input type="radio"/>	20900 - AIR CRITERIA	<input type="radio"/>	<input type="radio"/>
OPERATING CRITERIA			20890 - ALTERNATIVE DAILY COVER	<input type="radio"/>	<input type="radio"/>	GAS MONITORING & CONTROL		
20510 - DISPOSAL SITE RECORDS	<input type="radio"/>	<input type="radio"/>	20695 - PERFORMANCE STANDARDS	<input type="radio"/>	<input type="radio"/>	20918 - EXEMPTIONS	<input type="radio"/>	<input type="radio"/>
20515 - MSWLF UNIT RECORDS	<input type="radio"/>	<input type="radio"/>	20700 - INTERMEDIATE COVER	<input type="radio"/>	<input type="radio"/>	20919 - GAS CONTROL	<input type="radio"/>	<input type="radio"/>
20517 - DOCUMENT APPROVALS/REQUIREMENTS	<input type="radio"/>	<input type="radio"/>	20896 - BENEFICIAL REUSE	<input type="radio"/>	<input type="radio"/>	20921 - GAS MONITORING & CONTROL	<input type="radio"/>	<input type="radio"/>
20520 - SIGNS	<input type="radio"/>	<input type="radio"/>	HANDLING, EQUIPMENT & MAINTENANCE			20937 - REPT & CONTROL/EXCESSIVE GAS CON	<input type="radio"/>	<input type="radio"/>
20530 - SITE SECURITY	<input type="radio"/>	<input type="radio"/>	20710 - SCAVENGING/SALVAGING/STORAGE	<input type="radio"/>	<input type="radio"/>	CLOSURE		
20540 - ROADS	<input type="radio"/>	<input type="radio"/>	20720 - NON-SALVAGEABLE ITEMS	<input type="radio"/>	<input type="radio"/>	21110 - TIME FRAMES FOR CLOSURE	<input type="radio"/>	<input type="radio"/>
20550 - SANITARY FACILITIES	<input type="radio"/>	<input type="radio"/>	20730 - VOLUME REDUCTION/ENERGY RECOVERY	<input type="radio"/>	<input type="radio"/>	21780 - SUBMITTAL CLOSURE PLANS	<input type="radio"/>	<input type="radio"/>
20560 - DRINKING WATER SUPPLY	<input type="radio"/>	<input type="radio"/>	20740 - EQUIPMENT	<input type="radio"/>	<input type="radio"/>	TIRES		
20570 - COMMUNICATION FACILITIES	<input type="radio"/>	<input type="radio"/>	20750 - SITE MAINTENANCE	<input type="radio"/>	<input type="radio"/>	17351 - FIRE PREVENTION MEASURES	<input type="radio"/>	<input type="radio"/>
20580 - LIGHTING	<input type="radio"/>	<input type="radio"/>	CONTROLS			17352 - FACILITY ACCESS SECURITY	<input type="radio"/>	<input type="radio"/>
PERSONNEL			20760 - NUISANCE CONTROL	<input type="radio"/>	<input type="radio"/>	17353 - VECTOR CONTROL	<input type="radio"/>	<input type="radio"/>
20580 - PERSONNEL HEALTH & SAFETY	<input type="radio"/>	<input type="radio"/>	20770 - ANIMAL FEEDING	<input type="radio"/>	<input type="radio"/>	17354 - STORAGE	<input type="radio"/>	<input type="radio"/>
20610 - TRAINING	<input type="radio"/>	<input type="radio"/>	20780 - OPEN BURNING/BURNING WASTES	<input type="radio"/>	<input type="radio"/>	17355 - DISPOSAL	<input type="radio"/>	<input type="radio"/>
20615 - SUPERVISION	<input type="radio"/>	<input type="radio"/>	20790 - LEACHATE CONTROL	<input type="radio"/>	<input type="radio"/>	17356 - INDOOR STORAGE	<input type="radio"/>	<input type="radio"/>
20620 - SITE ATTENDANT	<input type="radio"/>	<input type="radio"/>	20800 - DUST CONTROL	<input type="radio"/>	<input type="radio"/>	OTHER		
CONFINED UNLOADING			20810 - VECTOR AND BIRD CONTROL	<input type="radio"/>	<input type="radio"/>	20921 - Gas Monitoring and Control	<input type="radio"/>	<input checked="" type="radio"/>
20630 - CONFINED UNLOADING	<input type="radio"/>	<input type="radio"/>	20820 - DRAINAGE & EROSION CONTROL	<input type="radio"/>	<input type="radio"/>		<input type="radio"/>	<input type="radio"/>
			20830 - LITTER CONTROL	<input type="radio"/>	<input type="radio"/>		<input type="radio"/>	<input type="radio"/>

Comments: (Note: for additional or continued comments use the CIWMB 03 or attach additional pages.)

- 1) Area of Concern - Pending Complete Modified Permit application with amended 1992 RDSI.
- 2) Area of Concern - Gas Monitoring and Control - Landfill Gas Management Plans have been submitted and are now approved. In process for installation of updated monitoring system.
- 3) Monthly Training - Incident Weather & Asbestos
- 4) A review of records was conducted with Todd Pattee. Records reviewed included daily tonnage, special occurrences, manifests, radiation monitoring logs, load screening, site inspection logs (daily, weekly, & monthly), waste discrepancy logs, waste receipts, weather records, employee training, flare logs, fire pump house log, SWPPP, SPCC, wet season run off monitoring, etc.
- 5) Hazardous waste storage. Accumulation dates - Waste Oil 11/20/09 Antifreeze 10/26/09, Load Check Bin 08/24/09, Used Oil Filter Drums 10/01/09
- 6) There were 7 batteries in the storage locker at the time of inspection.
- 7) Radiation Monitor calibration 11/7, 11/14, & 11/21.

INSTRUCTIONS ON BACK

Correct: ☒ Incorrect: ☐ ☐ ☐

EXAMPLE 1 2 3

Top White - CIWMB

Middle Pink - LEA

Bottom Yellow - Operator

Enforcement Agency:		County of Contra Costa			
SWIS Facility File Number (99-xx-9999)			Inspection Date		
07-AA-0032			1/23/2007		
LEA Periodic		CalRecycle Closed Sites		CalRecycle Focused	
LEA Focused		CalRecycle Enforcement Agent		<input checked="" type="checkbox"/> CalRecycle Periodic	
Inspection Time		Time In		Time Out	
Facility Name			Received By		
Keller Canyon Landfill					
Facility Location			Owner Name		
901 Bailey Road, Pittsburg 94565					
Inspector			Also Present (Name)		
<small>THE ABOVE FACILITY WAS INSPECTED FOR COMPLIANCE WITH APPLICABLE SECTIONS OF DIVISION 30 OF PUBLIC RESOURCES CODE (PRC) AND TITLE 14 AND TITLE 27 CALIFORNIA CODE OF REGULATIONS (CCR)</small>					
No Violations or Areas of Concern					

Comments:
<p>FACILITY: Keller Canyon Landfill</p> <p>SWIS NUMBER: 07-AA-0032</p> <p>INSPECTION DATE: January 23, 2007</p> <p>FACILITY LOCATION: 901 Bailey Road Pittsburg, CA</p> <p>FACILITY OPERATOR: Keller Canyon Landfill Inc. (Allied Waste)</p> <p>LAND OWNER: Same as operator</p> <p>LOCAL ENFORCMENT AGENCY: Contra Costa County Environmental Health</p> <p>INSPECTOR: B. Poroli, California Integrated Waste Management Board (CIWMB)</p> <p>ACCOMPANIED BY: Eric Fung, Contra Costa LEA, Todd Pattee (Lead Operator), Micky Hill (Site Manager) and Kevin Chiapello (General Manager)</p> <p>PERMITTED TONNAGE: 3,500 tons per day</p> <p>ACTUAL TONNAGE: Peak - 4,398.36 TPD on 10/02/06</p> <p>SITE TELEPHONE NO.: (925) 458-9800</p> <p>PERMIT ISSUE DATE: 3/27/2000</p> <p>LAST PERMIT REVIEW COMPLETED: 3/24/2005</p> <p>LIQUID WASTES ACCEPTED: No</p> <p>GAS/LEACHATE CONTROLS: Yes, Flare</p> <p>COVER: Tarps, Soil and Greenwaste. Greenwaste and soil were used on this inspection</p> <p>ACREAGE: Total Permitted Area - 1,399 acres. Permitted Area - 244 acres for disposal</p>

INSPECTION PURPOSE:

In accordance with Public Resources Code Section 43220, staff of the California Integrated Waste Management Board conducted an 18-month inspection of Keller Canyon Landfill in conjunction with staff of the Contra Costa County Local Enforcement Agency.

BACKGROUND:

The site is located just west of the City of Pittsburg in Contra Costa County. The landfill is surrounded by grazing land, zoned residential and commercial. The landfill is open to commercial haulers and not open to the general public (self haul). A large portion of the waste comes from the Contra Costa Transfer and Recovery Station (07-AA-0027) located in Martinez. Operational hours are 0700-1930 Monday through Saturday and no waste is accepted after 1900. The required daily cover shall be completed by 1930 at which time stationary working lights shall be extinguished.

PREVIOUS CIWMB INSPECTION RESULTS:

The previous State inspection of this facility was conducted on July 26, 2005. The inspection identified one violation of Public Resources Code, Division 30, Part 4, Chapter 3 for Section 44014(b) - Terms and Conditions of the Permit for exceeding the permitted traffic volume.

VIOLATIONS:

A. The inspection identified no violations of Public Resources Code, Division 30, Part 4, Chapter 3:

B. There was one violation of Title 27, California Code of Regulations, Consolidated Regulations for Treatment, Storage, Processing, or Disposal of Solid Waste as follows:

Section 20690 - Alternative Daily Cover. (b) (3) Processed Green Material (A) For the purposes of this section, processed green material means any plant material that is either separated at the point of generation, or separated at a centralized facility that employs methods to minimize contamination. Green material includes, but is not limited to, yard trimmings, untreated wood wastes, paper products, and natural fiber products. Green material does not include treated wood waste, mixed demolition or mixed construction debris, manure and plant waste from the food processing industry, alone or blended with soil. Processed green material may include varying proportions of wood waste from urban and other sources and shall be ground, shredded, screened, source separated for grain size, or otherwise processed. (B) Green material used for alternative daily cover shall be processed prior to being applied to the working face unless the green material to be used as alternative daily cover already meets the grain size specifications. Prior to spreading and compacting on the working face, processed green material shall comply with a grain size specification by volume of 95 percent less than 6 inches. Alternative processing and grain size specification requirements may be approved by the EA if the EA determines that the alternative meets the performance requirements of (a)(2) and (a)(3) of this section and the CIWMB concurs. (C) Processed green material shall be restricted to a minimum compacted thickness of 6 inches and average compacted thickness of less than or equal to 12 inches

According to the operator, green waste is not processed prior to placement on the working face as ADC. The regulations require that the green material used as ADC be processed prior to being applied to the working face unless the green material to used already meets the grain size specifications. Based on Board staff observation on the day of the inspection, the material did not meet the specifications required in the regulations.

Unprocessed green material as it is used for ADC
ADC

Unprocessed green material as it is used for

AREAS OF CONCERN:

A. The inspection identified one area of concern of Public Resources Code, Division 30, Part 4, Chapter 3.

Section 44014(b) - Terms and Conditions of the Permit. The solid waste facilities permit shall contain all terms and conditions that the local enforcement agency determines to be appropriate for the operation of the solid waste facility. The operator shall comply with all terms and conditions of the permit.

The facility weight and/or volume records indicated that the operator has on several occasions received more than the permitted 3,500 tons per day maximum. It has been the Boards policy that everything through the gate counts

with the exception of soil, regardless of whether it is landfilled or not. The operator stated that they have not been including the green material and concrete in the daily tonnage because the green material is used as ADC and the concrete as road base. The LEA should require the operator to implement a procedure to ensure that the maximum permitted daily tonnage limits are not exceeded.

B. There was one area of concern of Title 27, California Code of Regulations, Consolidated Regulations for Treatment, Storage, Processing, or Disposal of Solid Waste as follows:

Section 20640 - Spreading and Compacting. Solid waste shall be spread and compacted in layers with repeated passages of the landfill equipment to minimize voids within the cell and maximize compaction. The loose layer shall not exceed a depth of approximately two feet before compaction. Spreading and compacting shall be accomplished as rapidly as practicable, unless otherwise approved by the enforcement agency.

Board staff arrived at the site at 0545 to inspect cover. Green material was noted as ADC on the areas to be used the following day and soil in areas that would not be used for the next few days. During the inspection it was observed that the green material had not been properly spread and compacted. Some small areas were compacted, but throughout the working face where green waste was spread it was poorly compacted. This could be a result of the using the green material as ADC that has not been processed. Board staff observed some of the areas covered with soil were not properly spread and compacted.

A view of previous day active face covered with green material
green material.

The previous day active face covered with

A view of previous day active face covered with soil.

COMMENTS:

1. Report of Disposal Site Information (21600) - The load checking program in the RDSI requires a minimum of one vehicle transporting MSW each day and one self-haul vehicle per week. During review of the records it was noted that these minimum number of load check logs were not met. The minimum number of load check logs as specified in the RDSI must be met.

2. Tires - At the time of the inspection tires located behind the maintenance shop had standing water in them. Please ensure that the water is removed and that they are stored in matter to prevent standing water.

3. The operator's quarterly landfill gas monitoring reports results indicated no detectable levels of methane. On the day of the inspection methane samples were taken at GMP#1 and no detectable levels of methane were noted.