



GLENN COUNTY PLANNING & PUBLIC WORKS AGENCY

Willows, California 95988
John Linhart, Director



MEMORANDUM

PUBLIC WORKS DIVISION
777 N. Colusa Street / P.O. Box 1070
Willows, CA 95988
Tel: (530) 934-6530
Fax: (530) 934-6530

TO: Glenn County Waste Management Regional Agency DATE: May 10, 2010
FROM: Mandy Kleykamp, Solid Waste Programs Manager
RE: Summary of Solid Waste Activities for GCWMRA Meeting of May 19, 2010
cc: John Linhart, Director, Randy Murphy, Deputy Director, Di Aulabaugh, Staff Services Manager

The following are the highlights of Solid Waste activities in Glenn County since March 3, 2010.

Grants Status

Department of Resource Recycling and Recovery Beverage Container Recycling Grant

Funding for the City and County Beverage Container Recycling Grants has been restored, as has most funding for other Recycling Fund programs including support for material handlers and recyclers. Glenn County will receive \$10,000 and the City of Orland will receive \$5000. The City of Willows has applied on its own the last few years, and will also receive \$5000, if they applied last year. The grant administrator says the next cycle applications will come out in June or July, and funds will be distributed for programs and applications applied for during the last cycle. Funds should be received in the very near future.

Used Oil Block Grant

Word came from the Department of Resource Recycling and Recovery that the 15th cycle Used Oil Block Grant has been approved and jurisdictions can expect 15th cycle funds as soon as the 13th cycle grants are closed out. Our 13th cycle funds have been expended and we anticipate sending our 13th cycle final report and final payment request in the next report period.

The Used Oil Grant funds have been used to support our booth at the upcoming County Fair, and we hope to present oil recycling pledges in exchange for our wonderful give-always. This is our most important outreach and education event of the year.

Household Hazardous Waste

There have been no subsequent HHW pickups to report.

Online training for the landfill staff to attend required RCRA Hazardous Waste Handling Training is available. The most recent quote for online registration is \$125 per person. The cost quoted for on-site training is \$400 per person, and it may be possible to host training for ourselves, other departments, and other local jurisdictions. Presently the training provider, National Environmental Trainers [cab@natlenvtrainers.com], has no trainers available for on-site training due to the urgent situation in the Gulf of Mexico. The firm indicates that there are no on-site trainers available at this time and they are not able to predict when they might be available.

Before the Household Hazardous Waste Program can officially begin all staff that screens, sorts, or handles the material must receive training.

Non-Grant Business

Acquisition

The biologist working on our biological survey of the buffer zone area determined that fairy shrimp were present in the 500 foot expansion footprint. He said that the Glenn County Agriculture Department, with whom we contracted for the biological survey, does not have a qualified biologist to properly identify the observed invertebrates or make a determination as to whether or not they are a species of concern, threatened, or endangered. He said a permit from Fish and Wildlife Service is needed to collect a specimen for identification and that it takes a year to book a biologist with the required permits, although he was unable to tell me exactly what permit is required or suggest a qualified biologist. He also told me he saw a burrowing owl in the 92 acre portion of the acquisition, which is only of concern if we want to permit or use that portion of the land soon.

This is an unexpected turn of events, since we understood the County Agriculture Department had the proper credentials to conduct the necessary survey required by CEQA. It will be necessary to contract with a qualified firm to conduct a biological assay that can identify exactly what species of invertebrates are present and determine whether or not they are protected. If it turns out that neither they nor their eggs or dead bodies can be collected this season, then it may not be possible to construct either a fence or a roadway to access the new monitoring points.

Staff proposes to forego a road and a large fence and instead purchase an ATV to use to sample the gas wells. It should be possible to access the wells from the interior parts of the facility via ATV without entering the lower lying areas where ponded water supports the tentatively identified fairy shrimp. Such a strategy could forestall construction of a perimeter road indefinitely, or until the wetlands are finally delineated and species of concern identified.

Notice and Order (N&O)

Because we had two months without a tonnage violation, the N & O for tonnage is in abeyance. With the approval of our gas plan, all that remains is to install the new monitoring points and re-permit the facility. See progress of the permit below.

Solid Waste Long Term Strategic Plan

As mentioned at the March meeting, the firm of Lawrence and Associates has been retained for the design of the Closure/Post Closure Maintenance Plan for Phase A, a formal Joint Technical Document, and the design and specifications for the first Phase B lined expansion. The Closure Plan and the Phase B expansion plans will address many of our compliance problems, including landfill gas extraction and leachate management.

Permitting

After making substantive updates to the Preliminary Closure/Post Closure Maintenance Plan (CPCMP, (Haling & Associates, 2007) and to the Report of Disposal Site Information (RDSI), the permit application package was accepted by the Environmental Health Department and sent to Sacramento on May 4. The timeline will begin again where it left off. The Local Enforcement Agency (LEA) will host another public meeting and there will be another inspection of the landfill by the Waste Board prior to a final decision. The LEA has forwarded a draft of the new permit. There are several new reporting requirements, but none of them are especially onerous or difficult to develop. If approved, the permit should be in effect by about the first of July.

The 5 year Programs Review was submitted to the Office of Local Assistance at Cal Recycle. It has been reviewed and there are no obvious problems. The report has been forwarded up to the next level of review for final approval. The initial review panel indicates that the entire Integrated Waste Management Plan (IWMP) does not need to be updated, only the Non-Disposal Facilities Element (NDFE) and the Siting Element (SE) need revision, which will be a good deal easier than revision of the

entire five volumes of the IWMP. Cal Recycle needs a timeline for completion of the revision, which is under development.

Waste Discharge Requirements

The leachate seeps have dried up although our sump trench is still holding water. The standing water is green, but not black. When the weather and ground is reliably dry for the season, work will begin on seep correction.

Illegal Dumping

The new Code Enforcement officer assigned to illegal dumping is keeping busy. There have been few weeks since he started that there has not been one or two loads. There have been no cases prosecuted, to the best of my knowledge.

Landfill Fees

The Solid Waste Department was audited by the Board of Equalization the first week of May. As of this writing, the audit findings have not reached staff, it is expected that we have passed the audit and that we will be asked to tighten cash handling processes and ensure that all scale attendants are making correct change instead of rounding to the nearest dollar as in the past. Also under consideration, as a result of the audit findings, is changing the practice of not weighing in small vehicles bringing minimum loads. Presently scale attendants evaluate the load and charge the minimum fee of \$15 for all loads that appear to be under 425 pounds. All vehicles towing trailers or that can reasonably be expected to be carrying more than 425 pounds are weighed in and out. The auditor suggested that weighing every load is a better practice in order to prevent overcharging.

Equipment and Personnel

There is a need for more targeted Solid Waste training at the Management level for Mr. Immoos, and Solid Waste management is very interested in supporting efforts to cross train operators and clerical staff to serve as backup at the landfill, or vice-versa as needed. As mentioned previously, all staff need to complete training in Hazardous Materials Recognition and Handling before the Household Hazardous Waste program can begin.

Public Relations

The Glenn County Fair is accepting booth rentals, and the Solid Waste Department has again sponsored a booth. We plan to devote some, although less than usual, funding from our Used Oil Block Grant for premiums to hand out. Although this funding source is only available to promote used oil activities, the Fair is the best outreach opportunity of the year, and information about the landfill's progress might be very much appreciated by residents.

Closures

Since March 3, the landfill has closed on 17 times for tonnage and 15 times for wind. This is the breakout:

March: 7 closures for wind, 9 for tonnage. No days over 100 tons.

April: 3 closures for wind (re-opened on two of those days), 7 for tonnage.

May: 5 closure for winds, 1 for tonnage. No days over 100 tons.

New Regulations & Programs

Effective July 1, 2010, new rules will take effect with respect to post closure funding and corrective action funds. As you know, solid waste facilities are required to maintain a trust fund for closure activities, post closure maintenance, and for corrective action. The present rule is that facilities may not use funds from the Closure/Post Closure Trust Fund unless several conditions are met. They include, but are not limited to: 1) the expense must be directly related to closure, post closure maintenance, and/or corrective action ordered by regulators; 2) the expense must be approved in writing

by the regulators at Cal Recycle or the Water Board; 3) the Trust Fund must be fully funded to the level indicated by the facility's approved Closure Plan. If the fund is not fully funded, no funds may be accessed unless so ordered by the Regional Water Quality Control Board subsequent to a corrective action order. Many jurisdictions have made Pledge of Revenue guarantees with respect to the Corrective Action element, but maintain a fund for Closure/Post Closure.

The new regulations keep the Pledge of Revenue, which jurisdictions battled to keep. There were substantial changes to other parts of the trust fund process. The new regulations will require jurisdictions to prepare their fund portfolios to cover the entire cost of replacing the entire cover on the facility. This means a great deal more money held and not accessible to the jurisdiction, since most facilities only need to make minor repairs and filling over the thirty year post closure maintenance period. In addition, the 30 year post closure maintenance period has changed. It is now thirty years after a finding by the regulators that the facility is no longer a threat to the environment. For unlined facilities, this translates roughly into "forever". Jurisdictions will be required to update their Closure/Post Closure/Corrective Action cost estimates at least every five years, or whenever a new or revised permit is requested. These updates may not be made by the jurisdiction or by the consultants who designed the landfill or the closure construction. It must be done by a qualified third party consultant.

Presently Glenn County Landfill has \$3,333,000 on deposit for Closure/Post Closure. There is an insurance policy for the Corrective Action element. Our Preliminary Closure/Post Closure cost estimate is just over \$13 million dollars. Obviously we would be unable to access those funds for our closure costs, however, we are under a corrective action order from the Water Board, and our regulator assures us that upon receipt of an approved closure construction plan, he will authorize expenditure of funds to enable us to begin closure of Phase A. We will have a period of time to refill the fund before closure of Phase B, but Phase B will be done in small bites, so we can expect to close cells about every 5 years. We do not have to take each cell into Final Closure when we move to the new cell, but we will cover and stop placing waste as each cell is filled. Future fee evaluations, landfill budgets, and other revenue sources must take into consideration that Phase B will need to raise a fund in the neighborhood of \$15 million over a period of about 25 years, and annual deposits into the fund should be a minimum of \$450,000 or close to that figure. It might be advisable to consider investment options that yield more than the current interest rates.

Staff will participate in training on the subject of the new Financial Assurance law on May 10. More detail should be available to share during the meeting on May 19.