

From: [Ex, Peter](#)
To: [Kaye Woodworth](#); [Bryce Howard](#); [Bob Pestoni](#); [Rob Anglin](#)
Cc: [Morrison, David](#); [Myers, John](#); [Kara, John](#); [Secheli, Christine](#); [Kaiser, Sherri](#); [Karpowicz, Alyx@Waterboards](#); [White, Mark@Wildlife](#); [Xu, Jerry@Waterboards](#); [Evan Edgar](#); [Lederer, Steven](#)
Subject: 5-7-19 LEA inspection summary
Date: Tuesday, May 07, 2019 4:55:00 PM

Hi Kaye,

Following our inspection and conversation today I have summarized the following observations and required correction items/Violations:

- **Site Manager:** The LEA was notified this morning that Bryce Howard, current acting Site Manager will be out on medical leave, possibly for as long as 3 months. The new Site Manager first day on the job will be tomorrow. Some basic training was planned for tomorrow, but it was unclear what the short-term/long-term training plan will look like and who exactly will provide specific on-site training. Kaye stated that she will be working with the new Site Manager, but as staffing is short, would have other work duties to contend with as well. Per a call from Evan Edgar this afternoon, he will serve as “Interim Site Manager” to work on training new “Operations Manager” as Bryce is unavailable. He will be onsite as of tomorrow.
- **Fire Infrastructure:** Napa County Fire inspector was out last week, but as of today there is no official approval of the required fire prevention/response infrastructure as required by Napa County Fire Marshall.
- **Public Access:** For the second week in a row, CFL has failed to implement its Public Access Plan as proposed. Kaye stated CFL did not have adequate staffing today to provide one of three proposed spotters. Kaye provided the LEA with an email following the inspection stating that an additional staff person had been relocated to the identified spotter location per the CFL Public Access Plan. Lack of required spotters may result in potential safety issues as heavy earthmoving equipment, commercial vehicles, and the public are all using the same access roads with multiple roads joining near the active face of the landfill.
- **Litter Control:** For at least the past several weeks, litter has been observed by the LEA and RWQCB in significant quantities at various locations around the landfill. At today's inspection, significant litter was observed on the eastern main landfill access road below the active face of the landfill. The LEA is directing CFL to routinely collect litter at the landfill so as to prevent it from leaving the site. Additionally, litter controls such as screened fencing needs to be improved in this area. Additional litter was observed on the steep rock lined face near the retention basin outfall above the creek.
- **Inert debris waste outside of landfill:** What appears to be fire debris waste (inert materials such as concrete, burned trees, piping, rebar, bricks, asphalt, etc.) was observed by the LEA as having been pushed over the edge of the landfill operating boundary down a hill towards the creek. This was identified several months ago. Due to the steep terrain and inert nature of debris waste, the LEA directed CFL to remove the debris and properly dispose of it when it can be safely accessed. The debris was identified in two locations, one just south of the main retention basin outfall and another just upslope of the main retention basin outfall. Since last week, Ghilotti Const., per direction from Bryce Howard, has cut into the side of the upslope debris area and removed a significant amount of material. Ghilotti (Chris) stated

that they did not request approval from any agency prior to doing this work and the road was existing. Chris stated he will attempt to remove the downslope debris by reaching with large equipment bucket rather than cutting another road to access it.

- Unknown water from retention basin outfall culvert: During the inspection the LEA and Fish and Wildlife identified water flowing from the culvert that drains the retention basin area where leachate has been allowed to collect for many weeks. Although the outfall inlet was capped on the basin side of the culvert, it is possible that leachate is seeping through the capping material. The LEA directed CFL to have Golder collect samples to verify whether it is possibly leachate or groundwater seeping into the culvert from another location. Kaye stated she has requested Golder come out for sampling ASAP.
- Leachate Collection: CFL now has 40 frack tanks onsite, 33 of which are full. This represents approx. 725,000 gallons of leachate storage onsite. Per RWQCB, CFL may only use leachate for dust control that is collected in the concrete storage tanks. There is currently no approved plan to sample the frack tanks for use as dust control at this time. On average, CFL is using about 13,000 gallons of leachate per day for dust control. The amount of leachate generated per day appears to be falling close to the same amount as of the past couple of days.
- Intermediate Cover/Alternative Daily Cover: The LEA observed several locations in the active landfill area with significant surfacing trash with improper cover. This is likely contributing to litter blowing down the hill. Sufficient stockpiled soil, as required was not observed near the active landfill area despite significant soil movement around the site by Ghilotti Const. CFL was directed to immediately source soil and cover the exposed trash. During the inspection, Kaye directed Chris from Ghilotti to provide additional soil.

In summary, while significant progress has been made to address the immediate leachate and erosion issues since the end of March, CFL continues to have issues complying with State Minimum Standards as they pertain to landfill operations.

PETER EX. REHS
SOLID WASTE PROGRAM MANAGER
NAPA COUNTY PLANNING, BUILDING & ENVIRONMENTAL SERVICES
1195 THIRD STREET, SUITE 210
NAPA, CA 94559
DIRECT: (707) 253-4419
CELL: (707) 307-3740