

Disposal Facility Inspection Report (52)

Enforcement Agency:			Local Inspection ID:		
County of Napa					
SWIS Facility File Number (99-xx-9999)			Inspection Date		
28-AA-0002			2/13/2019		
<input checked="" type="checkbox"/> LEA Periodic		CalRecycle Closed Sites		CalRecycle Focused	
LEA Focused		CalRecycle Enforcement Agent		CalRecycle Periodic	
Inspection Time	4.0	Time In	8:30 am	Time Out	12:30 pm
Facility Name			Received By		
Clover Flat Resource Recovery Park			Clover Flat Landfill, Inc.		
Facility Location			Owner Name		
4380 Silverado Trail Road, Calistoga 94515			Upper Valley Disposal Service		
Inspector			Also Present (Name)		
Peter Ex, Julie Ex			Kaye Woodworth		

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)

<input type="checkbox"/>	No Violations or Areas of Concern
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V	A	Permits	Comments
		PRC 44002 - Operator Authorized by SWF Permit	
		PRC 44004(a) - Significant Change	

x	<p>PRC 44014(b) - Operator Complies with Terms & Conditions</p>	<p>SWFP Section 15 - Documents describing, restricting operation (JTD). JTD Section 5.2 - Including Site Manager.</p> <p>This position must be filled to fully manage the landfill and green waste/composting activities.</p> <p>Based upon the numerous Violations observed and discussions with employees during the inspection, it is clear that the interim Management and oversight of this operation is insufficient. Following the routine inspection on January 29, 2019, the operator was required to provide the LEA with an interim plan to address the vacant Site Manager position which will allow the operation to fully comply with State Minimum Standards and Permit Terms & Conditions within 15 days. To date, this report has not been received, but Upper Valley Disposal Service staff has reported that a new Site Manager has been hired and the anticipated start date is February 25, 2019.</p> <p>JTD Section 5.5.3 - Green Waste Handling states: On an interim basis, the green waste handling is limited to 1,000 cubic yards and must be cleared off by Sunday of each week, The storage will be on the top deck near the wet weather pad and a water supply from the temporary water storage tank and hose will be readily available to control any fires. A Site Plan is provided as Figure 27.</p> <p>During the inspection green waste processing was observed to have occurred near the C&D line, outside of the area approved and described in Figure 27. (This is a repeat Violation)</p> <p>Although the current JTD document does not specify a location where green waste "processing" may or may not occur, due to associated fire risk of running machinery and a green waste fuel source, this "processing" operation shall be required to occur within the approved area shown in Figure 27 until future fireprevention infrastructure has been installed and approved.</p>
	21640 - Title 27 Full permit review	
	21600 - Report of Disposal Site Information	
V	A Location Restrictions	Comments
	20270 - Airport Safety	
V	A Operating Criteria	Comments
	20510 - Disposal Site Records	
	20515 - MSWLF Unit Records	
	20517 - Document Approvals / Requirements	
	20520 - Signs	
	20530 - Site Security	
	20540 - Roads	
	20550 - Sanitary Facilities	
	20560 - Drinking Water Supply	
	20570 - Communications Facilities	
	20580 - Lighting	
V	A Personnel	Comments
	20590 - Personnel Health and Safety	
	20610 - Training	

		20615 - Supervision	
		20620 - Site Attendant	
V	A	Confined Unloading	Comments
		20630 - Confined Unloading	
V	A	Spreading/Compacting	Comments
		20640 - Spreading/Compacting	
		20650 - Grading of Fill Surfaces	
		20660 - Stockpiling	
V	A	Daily & Intermediate Cover	Comments
		20670 - Availability Cover Material	
		20680 - Daily Cover	
X		20690 - Alternative Daily Cover	<p>27 CCR § 20690. CIWMB - Alternative Daily Cover. [T14: §17682, §17258.21(b)] states in part: "(2) Alternative daily cover alone, or in combination with compacted earthen material, shall be placed over the entire working face at the end of each operating day or at more frequent intervals to control vectors, fires, odors, blowing litter, and scavenging without presenting a threat to human health and the environment. For the purposes of this section, the operating day shall be defined as the hours of operation specified in the solid waste facility permit, and may extend for more than 24 hours if operations are continuous. Waste-derived alternative daily cover shall be processed prior to spreading and compacting on the working face and applied and compacted to ensure that all exposed waste is completely covered by ADC and that there are no open voids within the cover material or in contact within the underlying wastes. Waste materials used as ADC that already meet the grain-size specifications of these regulations, or an alternative grain size approved by the EA and CIWMB pursuant to this section, need not be processed if the EA determines that the material as received at the landfill is adequate to perform the functions of daily cover and meets the appropriate specifications."</p> <p>During the inspection, a large area of exposed trash was observed on multiple tiers of an excavated slope. Only two tarps were observed onsite and appeared significantly undersized to properly cover the exposed trash by the end of the day. Although earthen materials were stockpiled nearby, the equipment operator stated that due to saturated conditions, he could not cover certain areas with soil. The operator was directed to provide materials sufficient to cover all exposed areas by the end of the day. Based upon communication from UVDS management, additional tarps and employees to properly cover all exposed areas would not be available until the following day.</p> <p>As of the time of writing this report, the operator has provided 3-4 large tarps to adequately cover areas of exposed trash, litter, and help mitigate other issues identified in this report.</p> <p>Photos showing exposed trash on day of inspection and now tarped areas have been attached to this report.</p>
		20695 - Performance Standards	

x		20700 - Intermediate Cover	<p>27 CCR Section 20700. CIWMB - Intermediate Cover. (T14:s17684) states in part: "(a) Compacted earthen material of at least twelve (12) inches shall be placed on all surfaces of the fill where no additional solid waste will be deposited within 180 days to control vectors, fires, odors, blowing litter, and scavenging.</p> <p>(b) Alternative materials of alternative thickness (other than at least twelve inches of earthen material) for intermediate cover may be approved by the EA with concurrence by the CIWMB, if the owner or operator demonstrates that the alternative material and thickness control vectors, fires, odors, blowing litter, and scavenging without presenting a threat to human health and the environment."</p> <p>A large area to the East of the active landfill area was observed as having extensive trash throughout. Due to the degree of saturation and amount of trash observed it was difficult to determine if the source was windblown litter or daylighting material or both. Insufficient tarps were available at the time of the inspection to cover the trash. (this is a repeat Violation, although different location than previous inspection)</p> <p>At the time of writing this report, the operator has submitted photos showing this area has since been covered with tarps until weather conditions allow for proper cover or trash removal.</p>
		20686 - Beneficial ReUse	
V	A	Handling Equipment & Maintenance	Comments
		20710 - Scavenging / Salvaging / Storage	
		20720 - Non-Salvageable Items	
		20730 - Volume Reduction/Energy Recovery	
		20740 - Equipment	
		20750 - Site Maintenance	
V	A	Controls	Comments
		20760 - Nuisance Control	
		20770 - Animal Feeding	
		20780 - Open Burning / Burning Wastes	
		20790 - Leachate Control	
		20800 - Dust Control	
		20810 - Vector and Bird Control	

x		20820 - Drainage and Erosion Control	<p>27 CCR § 20820. CIWMB - Drainage and Erosion Control. (T14:s17708,17715) states:</p> <p>"(a) The drainage system shall be designed and maintained to:</p> <ol style="list-style-type: none"> (1) ensure integrity of roads, structures, and gas monitoring and control systems; (2) prevent safety hazards; and (3) prevent exposure of waste." <p>During the inspection significant erosion was observed immediately downslope of the active landfilling area. This area was identified during the previous inspection on January 29, 2019. Based on photos taken on January 29, 2019 and February 13, 2019, zero progress was made to stabilize this area. During this inspection, at a time of heavy rain, the slope continues to erode and significant amounts of storm water is running through exposed landfill areas above and into drainage channels or the public access area below. (This is a repeat Violation)</p> <p>At the time of writing this inspection report, the operator has submitted photos documenting that the exposed landfill areas immediately above have been tarped to prevent contaminated runoff and divert stormwater from infiltrating the active landfill cells.</p>
		20830 - Litter Control	
		20840 - Noise Control	
		20860 - Traffic Control	
		20870 - Hazardous Wastes	
		20880 - Medical Wastes	
		20890 - Dead Animals	
		20900 - Air Criteria	
V	A	Gas Monitoring & Control	Comments
		20918 - Exemptions	
		20919 - Gas Control	
		20921 - Gas Monitoring and Control	
		20923 - Gas Monitoring	
		20925 - Perimeter Monitoring Network	
		20931 - Structure Monitoring	
		20932 - Monitored Parameters	
		20933 - Monitoring Frequency	
		20934 - Reporting	
		20937 - Reporting and Control of Excessive Gas Concentrations	
		20939 - Control Excessive Gas Concentrations	
V	A	Closure	Comments
		21110 - Time Frame for Closure	
		21780 - Closure Plan	
		21860(f) - Schedule Review/Approval C/PC Plans	

V	A	Corrective Action	Comments
		22101 - Corrective Action Cost Estimate	
		22103 - Updated Corrective Action Cost Estimate	
V	A	Tires	Comments
		17351 - Fire Prevention	
		17352 - Facility Access and Security	
		17353 - Vector Control Measures	
		17354 - Storage	
		17355 - Disposal	
		17356 - Indoor Storage	

Comments:

At the time of this inspection, significant rainfall had occurred in the past 12-24 hours and was expected to continue for another 24-48 hours. During the previous inspection on 1/29/19, the facility was given numerous Violations and some Areas of Concern. During the current inspection some issues had been corrected, but overall the LEA was very concerned with the landfilling operations. A summary of those concerns and corresponding violations are detailed above.

It should be noted that the operator took immediate action to attempt to correct and/or mitigate all Violations listed. Additionally, the operator has provided notification that a full-time Site Manager has been hired and has a plan start date of February 25th. It should also be noted that the operator has cleaned up all litter in the canyon to the east of the landfill as directed.

Overall, the past two inspections have indicated that the facility is failing to comply with State Minimum Standards and the terms and conditions of the Solid Waste Facility permit. Failure to correct the Violations listed and continued non-compliance will result in additional enforcement action.