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Cc: [Kara, John](#); mark.white@wildlife.ca.gov; Karpowicz, Alyx@Waterboards
Subject: 4-23-19 Inspection Summary
Date: Tuesday, April 23, 2019 4:10:00 PM

Those present: Peter Ex, Mark White (Fish & Wildlife), Kaye Woodworth & Bryce Howard (CFL), and Chris (Ghilotti Const.)

- Upon arrival, Kaye Woodworth (Compliance officer) let me know that the facility was having dust issues due to lack of dust control via water spray. I observed this issue throughout the inspection. I directed Bryce to implement dust control as required, to which he replied that RWQCB would not allow them to do that per their order. I told him that as the LEA I am requiring that he use clean water as dust control immediately. I further contacted RWQCB while onsite and Alyx confirmed that they have previously told CFL it was ok to use clean water as dust control in the interim. I let Bryce know that I had confirmed with RWQCB on the phone and he seemed upset, but began to make calls to organize water trucks and plan to obtain clean water. By the end of the inspection he stated he would have a truck from UVDS onsite today, and an additional larger truck would begin using well water for dust control tomorrow.
- There are currently 26 full frack tanks, 6 empty, and another 4 on order. (Estimated total leachate onsite, including basin at Mod 5B = 700,000 gallons) Still generating 1 frack tank plus per day. Bryce still provided no clear plan for leachate disposal. Implied they weren't going to pay the money to take it to facilities they have already determined able to receive.
- CFL had completed a lot of litter control in areas identified during previous inspections.
- Bryce stated that Alyx (RWQCB) and JC Isham (APTIM) are in frequent contact to discuss leachate disposal, but based email sent today, it appears a good plan is still in the works.
- Mark White (Fish & Wildlife) and LEA noted that CFL had made no progress towards installing immediate erosion control measures on upper areas above the landfill. Mark and I made it clear to Bryce that for every day CFL fails to make progress, the violation continues (per Fish and Wildlife regs). Mark discussed his issues with Chris of Ghilotti Const. who provided a lot of excuses as to why nothing had been done. Mark also made it clear that he cannot direct CFL on what they should do, only require that they come up with plan and corresponding action.
- A new pump has been installed on LEW2 bench above creek in a nearby gas well (CFLGV17). Water depth per Bryce noted 5' below grade on the slope, Nearly 8,000 gallons pumped since 4/18.
- Water flow at the blue line creek continues to decrease, no suspected leachate contaminated water observed flowing into creek at temp collection pond area.
- Eastern Slope Landfill – Bench 1:
 - A leachate transport pipe had been broken during excavation work and since repaired.
 - As water is continuing to seep from this area and it is unknown if it is leachate, Bryce was directed to keep a soil stockpile and erosion control devices in this location just in case any rain is forecast. Per Bryce, the abandoned gas wells on this bench are full of water up to 5-6' below grade which is the approximate depth to trash. I told Bryce

that based on this information we need to assume any water seeping from the area is leachate.

- I observed new fire water pipe infrastructure being completed at the main water storage tanks above the landfill. Adam Mone, Fire Marshall Plan reviewer stated this morning that CFL submitted over the counter plans last week for this work.
- Bryce and kaye asked if the LEA would allow them to grind composted food waste onsite prior to delivery to UVDS. This has been previously approved through their EA Notification permit. However, at this point I don't plan to approve any additional processing until they have approved fire infrastructure completed. I asked Bryce if they have the ability to continue to store the material in food waste bins which he confirmed they do.
- Frack tanks leaking: Over the past few weeks I have observed water flowing or ponding near the upper pad leachate storage frack tanks. Previously Bryce said they were being overfilled. Today Mark and I tried to find a source of the water. When we asked Bryce about the ponding water he stated that some of the tanks were being delivered with valves partially open and one of the drivers recently found the opened valves and closed them.

Please let me know if anyone has any questions.

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