

From: [Ex, Peter](#)
To: [Morrison, David](#); [Secheli, Christine](#); [Kara, John](#); [Myers, John](#)
Subject: CFL Inspection Summary 4-16-19
Date: Wednesday, April 17, 2019 8:48:00 AM

Agency Reps Present: RWQCB, Fish & Wildlife, DA (Katy Yount)

CFL Reps Present: Bryce Howard (Site Manager), JC Isham (APTIM), Evan Edgar (Edgar Consulting), Kaye Woodworth (CFL Safety/Compliance)

Collection Pond at Creek:

- No water observed flowing into 60 mil lined collection pond and small basin dug at creek bank, and no water observed flowing into creek at this location.
- 17,000 gallons have been pumped from this location since pump was first installed
- F & W directed CFL to file Emergency Grading notice for work done at creek
- Discussed Creek restoration, but first step will be preparing plan for Final-Partial Closure of the old landfill areas on the eastern slopes. That work likely won't begin until next summer 2020, and creek restoration will follow. CFL consultants will coordinate with all agencies moving forward.

Old Landfill Eastern Slopes:

- CFL and Ghilotti have made significant progress in cleaning up the benches and filling in erosion channels with soil. In the process they have been documenting the depth of trash (reported as 6-9' below grade in most areas on the upper slopes).
- The slopes are drying quickly, some small seeps still observed near old gas wells, could either be acting as conduit for leachate or just surface water drainage down the slope. Water observed appears clear with little to no oily sheen.
- Ghilotti had cleared almost every bench on the eastern slopes, removed contaminated soil into landfill and placed new clean soil. They plan to work their way down to the creek removing contaminated soil and filling eroded channels.

Active landfill Areas:

- All areas have been covered with clean soil as intermediate cover.
- Leachate seeps have been significantly mitigated.
- A lot of plastic trash was observed in a road drainage channel and operator was directed to pick up.

Leachate Collection/Disposal:

- CFL has begun pumping out the ponding leachate/storm water in the Module 5B basin.
- It is anticipated they will have roughly 25 full frack tanks by the end of the week (500,000+ gallons). They are still filling approximately a tank per day.
- When asked multiple times what they plan to do with leachate, the answer was to store it in tanks. RWQCB directed CFL to start hauling off as hazardous waste. JC Isham was directed by Bryce Howard to come up with a plan for leachate disposal. Based on comments from Bryce it appeared that there may be one or two facilities that will take the leachate for around \$1/gallon, not including trucking fees.

Leachate Collection System:

- Ghilotti has installed a large soil berm around the existing leachate collection tanks as secondary containment, and upgraded the fill truck collection piping to prevent any further leakage.
- Per JC Isham and Bryce Howard, the leachate collection system is functional as originally designed. They have stated the system will be overhauled and re-designed.
- They plan to replace the heavily corroded LEW2 leachate extraction well with a nearby no longer used newer gas extraction well. A work order was in to install a pump in the gas extraction well.

Public Access:

- Based on my site inspections last Friday and yesterday the LEA recommends amending the Notice and Order to allow public access with at least one condition:
 - 1) The public waste disposal drop off area (cement C&D pad) shall only be approved during dry weather. As there is no approved storm water system RWQCB does not want trash deposited on the pad during rainy weather. CFL may soon be able to show they can safely allow public access to the active landfill area regardless. CFL consultant Evan Edgar has yet to submit a plan showing how the public access will be operated, but I imagine we will have it before the end of the week.
- The leachate collection and lack of disposal at this point is obviously still a big concern, but the LEA may have trouble requiring additional action as it may or may not affect Public access at this point. We can re-evaluate if they continue to accumulate tanks, see public contact issues etc., but it's likely the RWQCB is going to start taking more of the lead on this issue going forward.

The focus problem area for RWQCB and Fish & Wildlife has now shifted to the erosion and sediment issues upslope of the landfill caused by grading over the past 6-8 months. They have been directed to address the issues immediately by the LEA, RWQCB and Fish & Wildlife.

CFL has flown in from San Diego additional consultants from APTIM to help with immediate and long term planning for erosion, storm water systems, leachate collection systems, and final-partial closure planning. It appears CFL is now relying more heavily on third party experts going forward to correct all issues and more importantly it appears they have the authority to make things happen. Nevertheless, the LEA needs to remain diligent in ensuring continual progress is made in a timely manner.

I plan to reduce my inspection frequency from 2x week to 1x week until the end of April and can adjust accordingly. My next inspection will be next Tuesday w/ Fish and Wildlife.

PETER EX. REHS
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