Composting Materials Handling Operation and Facility Inspection Report (93)

| Enforcement Agency: | | | | Local Inspection ID: | | | |
|---|--------------------|-------------|--------------------|-----------------------------|----------|--|--|
| County of Napa | | | | | | | |
| SWIS Facility File Number (99-xx-9999) | | | | Inspection Date | | | |
| 28-AA-0002 | | | | 7/6/2018 | | | |
| LEA Periodic CalRecycle Closed Sites | | C | CalRecycle Focused | | | | |
| X LEA Focused | CalRecycle Enforce | ement Agent | C | alRecycle Periodic | | | |
| Inspection Time | 4.0 | Time In | | | Time Out | | |
| Facility Name | | | Rec | Received By | | | |
| Clover Flat Resource Recovery Park | | | Clo | Clover Flat Landfill, Inc. | | | |
| Facility Location | | | | Owner Name | | | |
| 4380 Silverado Trail Road, Calistoga 94515 | | | | Clover Flat Landfill, Inc. | | | |
| Inspector | | | Also | Also Present (Name) | | | |
| Greg Pirie | | | | aye Woodworth, Bryce Howard | | | |

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)

| | No Violations or Areas of Concern | | |
|---|-----------------------------------|--|----------|
| V | A | Permits - Facilities | Comments |
| | | PRC 44002 - Operator Authorized by SWF Permit | |
| | | PRC 44004 - Significant Change | |
| | | PRC 44005 - Transfer of Owner or Operator | |

| | x | PRC 44014(b) - Operator Complies with Terms & Conditions | SWFP Section 15 - Documents describing, restricting operation (JTD). JTD Section 5.2 - Including Site Manager. Site Manager position has been vacant for a several months. |
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| | | | This position should be filled to fully manage the landfill and composting activities as described in the JTD. |
| | | | JTD Section 2.2.2 - Storage Methods, Table 2. Storage of Recyclables and Commodities. |
| | | | With the recent fire/smolders(s) (including Sept 1, June 22, July 4) at the landfill concerning storage of green, wood material, the LEA will monitor future operations as they move forward and may increase or decrease the amount of materials that may be stored - dependent on ability to control fires, maintain small volume size piles (recommend 1,000 cuyd max), perimeter fire lane, available water etc). |
| | | | GREEN MATERIAL: Table 2 states Clean Green Material and/or co-collected with residential food material have a storage time of 7 days storage without a biofilter (formal composting techniques). |
| | | | ALL GREEN MATERIAL SHALL BE STORED FOR 7 DAYS OR LESS, THEN HUALED OFF-SITE OR USED FOR AN APPROVED BENIFICIAL REUSE. LEA has discretion to increase/decrease volumes. |
| | | | WOOD (CONSTRUCTION MATERIAL, PALLETS): Table 2 states Clean Recovered Wood Material has a storage time of 60 days. (Not mixed with curbside or landscape wood material) |
| | | | ALL WOOD MATERIAL SHALL BE STORED FOR 60 DAYS OR LESS, THEN HUALED OFF-SITE OR USED FOR AN APPROVED BENIFICIAL REUSE. |
| | | 17210.3 - Request for Emergency Waiver | |
| | | 17211.3 - Request for Temporary Stip. Agreement | |
| | | 17211.4 - Issuing Stipulated Agreement | |
| | | 17854 - Compostable Materials Handling Facility Permit | |
| | | 17863 - Report of Composting Site Information | |
| | | 18104 - Registration Permit (Chipping and Grinding/Vegetative Food Material Composting) | |
| | | 21640 - Permit Review Application | |
| V | Α | Filing Requirements - Operations | Comments |
| | | 18103.1 - Enforcement Agency Notification Filed | |
| V | Α | Agricultural Material Composting Operations | Comments |
| | | 17856(a) - Agricultural Material Composting Operation EA Notification Requirements | |
| | | 17856(b) - Agricultural Material Composting Operation Odor Impact Requirements | |

| | | 17856(d)(1) - Excess Material on Ag. Land Pose Risk to Public Health & Safety and Environment | |
|---|---|---|----------|
| | | 17856(d)(2) - Exceedance of 12,500 CY of Green Material, On-Site | |
| V | Α | Green Material Composting Operations and Facilities | Comments |
| | | 17857.1(a)(2) - Seasonal Variations | |
| | | 17857.1(b) - Non-Compliance with Physical Contam. Limits/Processing Requirements/Max. Volume | |
| | | 17857.1(c) - Exeedance of 12,500 Cubic Yards | |
| V | Α | Research Compost Operations | Comments |
| | | 17862(a) - Max. 5,000 CY on Site | |
| | | 17862(b) - In Vessel - LEA/EApp. for > 5000 CY | |
| | | 17862(c) - Description and Completion Time Frame | |
| | | 17862(d) - Research Time Frame (2 years) | |
| | | 17862(e) - Research of Mammalian Tissue | |
| V | Α | Chipping And Grinding Ops and Facilities | Comments |
| | | 17862.1(a) - Chip / Grind 200 TPD - EA Notification | |
| | | 17862.1(b) - Chip / Grind 200-500 TPD Reg. Permit | |
| | | 17862.1(c) - Chip / Grind > 500 TPD Full Permit | |
| | | 17862.1(f) - Chip / Grind Contamination Limits | |
| | | 17862.1(g) - Chip / Grind Storage Limit Time Exceeded | |
| V | Α | Siting And Design | Comments |
| | | 17865(a) - Closed Landfills (Postclosure Land Use) | |
| | | 17865(b) - Intermediate Cover (Foundation Stabilization) | |

| X | | 17866 - General Design Requirements | SWFP 17 (J) Location of green and/or wood piles. Green storage involved in the June 22 fire (with a large amount currently remaining) was placed on and southern side slopes of landfill. JTD Site Plan indicates storage piles are to be on the top operations deck/operations layer of the landfill, not the side slopes, unless at a depth consistent with alternative intermediate cover as stated in Title 27. GREEN MATERIAL ON SOUTHERN SIDE SLOPES ARE NOT LOCATED ON TOP OPERATIONS LAYER - GREEN MATERIAL SHALL BE REMOVED WITHIN 7 DAYS - ONLY MATERIAL SHALL BE REMOVED WITHIN 7 DAYS - ONLY MATERIAL THAT MAY REMAIN IS 12-24" OF ALTERNATIVE INTERMEDIATE COVER/EROSION CONTROL CONSISTEN WITH TITLE 27. |
|---|---|--|--|
| ۷ | Α | General Operating Standards | Comments |
| | | 17863.4 - Odor Impact Minimization Plan | |
| | | 17863.4.1 - Odor BMP Feasibility Report | |
| | | 17867(a)(1) - Prohibited Wastes | |
| | | 17867(a)(2) - Odor Control | |
| | | 17867(a)(3) - Vectors/Litter/Hazard/Nuisance/Noise/Dust | |
| | | 17867(a)(4) - Random Load Checks | |
| | | 17867(a)(5) - Compost Contamination | |
| | | 17867(a)(6) - Unauthorized Access | |
| | | 17867(a)(7) - Traffic Control | |
| | | 17867(a)(8) - Signs | |
| | x | 17867(a)(9) - Fire Prevention, Protection and Control | (a) (9) of this section states "The operator shall provide fire prevention, protection and control measures, including, but not limited to, temperature monitoring of windrows and piles, adequate water supply for fire suppression, and the isolation of potential ignition sources from combustible materials. Firelanes shall be provided to allow fire control equipment access to all operation areas." Due to the placement of green material on steep southern slopes, fire prevention and suppression difficult. The area involved in the smolder response of green material of the landfill was located on the operations layer with greater access. Previous hot spots were observed in April 2018 - the operator states in the last several weeks there have been inconsistent internal combustion, smoldering, and small amounts of smoke. |
| | | | Fire prevention and water was available. Further mitigation requirements may be identified by the Napa County Fire Marshal. |
| | | 17867(a)(10) - Telephone or Radio Communication | |
| | | 17867(a)(11) - Physical Contamination Refuse Removed | |
| | | 17867(a)(12) - Enclosed Activities Ventilation | |

| | | 17867(a)(13) - Leachate Control | |
|---|---|---|----------|
| | | 17867(a)(14) - Physical Contamination | |
| | | Prevented or Removed | |
| | | 17867(a)(15) - Site Attendant | |
| | | 17867.5 - Personnel Training | |
| v | Α | Sampling Requirements (Operations that sell or give away > 1000 cubic yards and all Facilities) | Comments |
| | | 17868.1(a) - Sampling Requirements | |
| | | 17868.1(c) - Alternative Methods Approved | |
| ۷ | Α | Maximum Metal Concentrations | Comments |
| | | 17868.2(a) - Metal Concentration Exceeded | |
| | | 17868.2(b) - Alternative Methods Approved | |
| ۷ | Α | Pathogen Reduction | Comments |
| | | 17868.3(a) - Pathogen Levels Exceeded | |
| | | 17868.3(c) - Windrow/Aerated Static Pile Temperature Monitoring | |
| | | 17868.3(d) - Alternative Methods Approved | |
| ۷ | Α | Physical Contamination Limits | Comments |
| | | 17868.3.1(a) - Physical Contamination Limits | |
| ۷ | Α | Green/Vegetative Food Material Processing | Comments |
| | | 17868.5(a) - Load Checking / Sorting | |
| | | 17868.5(b) - Physical Contaminants | |
| | | 17868.5(c) - Personnel Training | |
| | | 17868.5(d) - Records | |
| ۷ | Α | Record Keeping | Comments |
| | | 17869(a) - Inspection of Records | |
| | | 17869(b) - Special Occurrences | |
| | | 17869(c) - Public Complaints | |
| | | 17869(d) - Feedstock and Compost | |
| | | 17869(e) - Load Checking | |
| | | 17869(f) - Article 7 Test Results | |
| | | 17869(f)(1) - Pathogen Reduction Methods | |
| | | 17869(g) - Record of Serious Injuries | |
| | | 17869(h) - Training Records | |
| V | Α | Site Restoration | Comments |
| | | 17870(a) - Notice 30 Days Prior to Restoration | |
| | | 17870(b) - Protection Public Health, Safety, Environment | |
| | | 17870(c) - Restoration Procedures Performed | |

Comments:

"Focused" inspection report - Clover Flat Landfill fire (smolder) response on July 4, 2018 - LEA inspection July 6, 2018. On July 4th at approximately 7pm white smoke notice by passerby and called 911. CAL FIRE/Napa County Fire responded and extinguished the hot spot (approximate size of a vehicle) CFL personnel left for the day approximately 30 min prior to the response. The green material fire was located on intermediate cover, in a small windrow shape pile. CFL personnel returned and stayed on-site with equipment, water, made sure fire was out and were present 24 hours.

Refer to June 22, 2018 inspection for previous fire response event. Refer to Kaye Woodworth's Compost Fire Incident Report (July 5, 2018) for further incident specifics. Refer to Areas of Concern and/or Violations above for descriptions, recommendations, and directives for the Owner/Operator.

Attachment Pictures: Site Overview. Southern Side Slopes across from maintenance area (material removal in progress).