CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION

CLEANUP AND ABATEMENT ORDER NO. R2-2019-0014

CLOVER FLAT LANDFILL
CLASS III SOLID WASTE DISPOSAL FACILITY
CALISTOGA, NAPA COUNTY

The California Regional Water Quality Control Board, San Francisco Bay Region (Regional Water Board or Water Board) finds that:

1) **Site Ownership and Location**: Clover Flat Landfill, Inc., operates and Vista Corporation owns Clover Flat Landfill (hereafter, CFL or the landfill). Clover Flat Landfill, Inc. and Vista Corporation are jointly named as the Dischargers. Clover Flat Landfill is a Class III municipal refuse disposal site located at 4380 Silverado Trail, about three miles east of the city of Calistoga in northern Napa County (Figure 1).

2) **Site Hydrology:** Drainage from the site feeds into an unnamed ephemeral creek that runs along the eastern perimeter of the landfill (Figure 1). This creek is a tributary to Dutch Henry Creek, which ultimately discharges to the Napa River approximately 1.3 miles south of the landfill.

3) **Purpose of this Order**: This Cleanup and Abatement Order requires the Dischargers to perform corrective actions to address serious operational and water quality violations that require immediate action to prevent unlawful discharges of landfill leachate to waters of the state that threaten public health and safety and pose a significant risk to the environment. Water Board staff discovered these violations during recent site inspections, particularly during a March 26, 2019, site inspection, as further described below. Due to the gravity of the situation, the Napa County Department of Planning, Building and Environmental Services issued an Environmental and Health Advisory on March 29, 2019, advising the public of the release of leachate and stormwater into a tributary to Dutch Henry Creek and not to consume, use, or contact the water.

4) **Discharge of Leachate into Waters of the State and Other Observations**: During a routine inspection on March 12, 2019, with representatives of CFL and its consultant Blue Ridge Services (BRS), Water Board staff observed numerous leachate seeps emerging from the active face of the landfill. This leachate was visibly commingling with stormwater and running off the site in multiple locations (notably from Module 5, the active filling area in the northeast corner of the landfill- see Figure 26 landfill modules). After the inspection Water Board staff planned to perform a follow-up inspection three weeks later to give BRS and CFL time to address the leachate seeps, as well as the commingling of stormwater and leachate.

   On March 21, 2019 (prior to the planned follow-up inspection), however, Water Board staff received notification of the leachate tanks overflowing at the landfill. In response to this notification, staff inspected the landfill on March 26, 2019. During this inspection, Water Board staff observed that the landfill's three concrete leachate holding tanks, which have a combined capacity of 30,000 gallons and lack secondary containment, were

nearly empty. A fourth metal tank, used to store landfill gas condensate, was mostly full. A landfill representative informed Water Board staff the leachate from the concrete tanks was sprayed on the working face of the landfill for dust control by the landfill's water truck, which has a capacity of 3,500 gallons. The representative told Board staff that two truckloads were sprayed for dust control on Friday March 22, 2019, but he could not confirm if the truck continued to spray leachate over the weekend. A substantial volume of leachate from the concrete tanks remains unaccounted for.

Water Board staff were also informed during the inspection that the leachate pump located near the toe of the landfill (LEW-2; see Figure 12) had been spraying leachate onto the ground instead of pumping it up to the three concrete holding tanks as intended. The location of the leachate pump is approximately 150 feet from the creek, and Water Board staff observed ponded leachate flowing into the creek from LEW-2 (see photo number 535 in the attached photo log), which was in severe disrepair and completely rusted. During the time that the three concrete leachate tanks were full (approximately two weeks), leachate was being routed into the metal condensate storage tank and mixed with landfill gas condensate. This mixture of leachate and condensate was being used as dust control at the landfill as recently as Monday, March 25, 2019 (despite the fact that a significant amount of rain, 0.65 inches, fell in Calistoga on that day, according to records of the National Weather Service).

Water Board staff also observed severe erosion and rilling on the bench/access road leading to the leachate pump, as well as black oily water actively running down the hill into the creek from the lower leachate collection system (LCS) (see photo number 589 in the attached photo log, as well as Figure 12 for the locations of the leachate pumps.)

Water Board staff observed ponded leachate and stormwater on the landfill bench between covered waste slopes, as well as a new pipeline that ran from the active area of the landfill directly into the creek (see photo number 575 in the attached photo log). The landfill's personnel informed staff that this pipe was transporting stormwater from the active disposal area directly to the creek to prevent additional erosion on the hillside (see photo number 615 in attached photo log). Upon inspection of the active waste disposal area, staff observed the leachate seeps mixing with stormwater and flowing into drop inlets (see photo number 684 in attached photo log). The drop inlets collected leachate and stormwater runoff and transported it into the pipe running down the hillside and into the creek.

Water Board staff inspected the landfill again on April 2, 2019 and found that the landfill operator had implemented some measures to stop leachate from leaving the site and discharging into the creek:

a. The pipeline that was draining the leachate and stormwater mixture from the active disposal area had been removed from the creek. The drop inlet that was collecting this water was blocked, and a sump was installed to capture the mixture and route it to a temporary storage tank.
b. The black oily water that was observed around the LCS area was being partially captured by a sump and routed to the leachate tanks. This sump was not entirely effective at keeping this black oily water from entering the creek, as it was

constructed with earthen berms. Staff were informed on April 3, 2019, that the sump was lined with plastic to prevent further runoff into the creek.

c. The leachate seeps on the active face of the landfill were being addressed by installation of French drains and placement of new soil cover.
d. Where leachate and stormwater were mixing in the upper northeast corner of the site (Module 5), the stormwater conveyance pipe was filled with cement, and the leachate line capped where it was discharging through the riprap below and into the creek. However, there is now a large pond of leachate and stormwater in the bottom of Module 5 that is adjacent to waste and partially inundating the liner.
e. Four 20,000-gallon holding tanks had been brought to the landfill to provide additional leachate storage capacity.

Further immediate corrective action is necessary to prevent additional leachate discharges into the creek due to additional seeps being discovered, and to contain the black oily water that was still entering the creek as recently as April 2, 2019.

5) **Violations of Waste Discharge Requirements Order No. R2-2008-0027 (WDRs)**: During the Water Board's March 26, 2019, inspection, staff observed and documented several violations of the landfill's WDRs and the General Industrial Stormwater Permit Order No. 2014-0057-DWQ. These violations include the following:

a. Prohibition No. 2 of the landfill's WDRs states that *"Wastes shall not be disposed of in any position where they can be carried from the disposal site into waters of the State or of the United States."* Poor stormwater management practices have allowed waste to be blown and/or carried by stormwater down to the creek. Furthermore, severe erosion from lack of stormwater management has washed away the soil cover in several areas of the old, unlined portion of the landfill which are topographically above the creek. Erosion of the landfill cap also increases the likelihood that buried waste will be exposed and carried down to the creek.

b. Prohibition No. 13 states that *"Surface drainage from tributary areas and internal site drainage from surface or subsurface sources shall not contact or percolate through wastes during the life of the site."* However, such drainage is actively happening at the site and has resulted in leachate commingling with stormwater at the site.

c. Prohibition No. 15 states that *"Leachate, stormwater, or stormwater or groundwater containing leachate or in contact with waste, shall not be discharged into waters of the State or of the United States unless specifically authorized under an NPDES permit."* Active leachate seeps from multiple locations on the landfill are mixing with stormwater, and this combined liquid was being discharged until March 29, 2019, when the pipeline was removed from the creek. Leachate was still actively leaking from numerous points on the eastern side slopes as of April 2, 2019, and into the creek.

d. The discharge of the active leachate seeps mixed with stormwater directly to the creek is also a violation of the General Industrial Stormwater Permit Order No. 2014-0057-DWQ.

e. Prohibition No. 16 of the WDRs states that "*The treatment, storage, or discharge of groundwater or leachate shall not create a condition of pollution or nuisance as defined in Section 13050 of the California Water Code, nor degrade the quality of waters of the State or of the United States."* Analytical results collected from leachate samples on March 25, 2019, indicate that volatile organic compounds (mostly benzene compounds, tert-butyl alcohol, and zinc) are present at concentrations exceeding either Maximum Contaminant Levels (which are the cleanup levels that shall be used when evaluating a drinking water source), or the East Bay Municipal Utility District's (EBMUD) waste water treatment plant influent limits. EBMUD was the only entity that had the capacity to take the volume of leachate CFL generated, and conditionally agreed to take the leachate pending analytical data.

   With the intake of a significant volume of debris from the 2017 Napa fires, followed by heavy rains in the last several months, the likelihood of additional contamination in leachate is high. The chemical quality of the leachate, especially with the observation of black, oily water observed seeping out from the landfill and into waters of the state, is therefore of serious concern and threatens public health and safety and the environment.

f. Prohibition No. 17 states that *"The Discharger shall not cause the following conditions to exist in waters of the state or of the United States at any place outside the landfill boundary*":
   a. *"Visible, floating, suspended, or deposited oil or other products of petroleum origin."* The black oily substance that we observed in the pooled water on the banks of the creek had a distinct petroleum sheen.

g. Specification No. 4 states that "*The Discharger shall maintain, inspect, repair, and replace all devices installed in accordance with this Order such that they continue to operate as intended without interruption."*
   a. The leachate and condensate tanks have no secondary containment and have a history of repeated overflows.
   b. The pump that conveys leachate from the toe of the landfill has not been working properly and is clearly in disrepair.
   c. The facility does not have or maintain proper stormwater conveyance and storage capability.

h. Specification No. 8 states that *"Containment, collection, drainage, and monitoring systems for groundwater, surface water, and leachate shall be maintained and operated as long as waste or leachate is present and poses a threat to water quality."* Water Board staff observed that the facility is not containing surface water, and the leachate containment is severely lacking in capacity and overflow measures. Additionally, groundwater impacts may be identified in or downgradient of areas where leachate has been seeping onto the ground surface. Groundwater from the landfill likely percolates into the underlying Sonoma Valley Groundwater Basin, and therefore has the potential to contaminate a source of drinking water.

i. Specification No. 20 states that *"The Discharger shall notify the Water Board immediately of any failure occurring in the landfill. Any failure that threatens the*

integrity of containment or control features at the landfill shall be promptly corrected after approval of the method and schedule by the Executive Officer." No notice was provided to the Water Board when the leachate overflow was first observed, or when the severe erosion on the hillsides led to the decision to route commingled stormwater and leachate directly to the creek.

Based on the violations noted above, the Water Board issued a Notice of Violation to the Dischargers on March 29, 2019.

6) **Basin Plan and State Water Resources Control Board Policies:** The *Water Quality Control Plan for the San Francisco Bay Region* (hereafter, Basin Plan) designates beneficial uses, establishes water quality objectives, contains implementation programs for achieving objectives, and incorporates by reference plans and policies adopted by the State Water Resources Control Board. The beneficial uses of Dutch Henry Creek, as identified in Table 2-1 of the Basin Plan, include warm and cold water habitat, fish migration and spawning, preservation of rare and endangered species, and recreation. The Napa River beneficial uses include the same as Dutch Henry Creek, as well as agricultural and municipal use and groundwater recharge. The beneficial uses of the Napa Sonoma Valley Groundwater Basin, as identified in Table 2-2 of the Basin Plan, include municipal and domestic supply, agricultural supply, and industrial service and process water supply.

   State Water Resources Control Board Resolution 68-16 (Anti-Degradation Policy), "Statement of Policy with Respect to Maintaining High Quality of Waters in California," applies to this discharge. It requires maintenance of background levels of water quality unless a lesser water quality is consistent with maximum benefit to the people of the State, will not unreasonably affect present and anticipated beneficial uses, and will not result in exceedance of applicable water quality objectives. This order and its requirements are consistent with Resolution No. 68-16.

   State Water Board Resolution No. 92-49, "Policies and Procedures for Investigation and Cleanup and Abatement of Discharges Under Water Code Section 13304," applies to this discharge. It directs the Regional Water Boards to set cleanup levels equal to background water quality or the best water quality which is reasonable, if background levels cannot be restored. Cleanup levels other than background must be consistent with the maximum benefit to the people of the State, not unreasonably affect present and anticipated beneficial uses of such water, and not result in exceedance of applicable water quality objectives. This order and its requirements are consistent with the provisions of Resolution No. 92-49, as amended.

7) **California Safe Drinking Water Policy:** It is the policy of the State of California that every human being has the right to safe, clean, affordable, and accessible water adequate for human consumption, cooking, and sanitary purposes. This order promotes that policy by requiring discharges to meet maximum contaminant levels designed to protect human health and ensure that water is safe for domestic use.

8) **Preliminary Cleanup Goals:** Pending the establishment of cleanup levels, preliminary cleanup goals will be set at Maximum Contaminant Levels, due to the beneficial uses of

both the Napa River and the Napa Sonoma Valley Groundwater basin, in conducting remedial investigation and action. These goals should address all relevant media (e.g., groundwater, soil) and all relevant concerns (e.g., groundwater ingestion, migration of groundwater to surface waters).

9) **Basis for 13304 Order:** California Water Code Section 13304 authorizes the Regional Water Board to issue a cleanup and abatement order requiring a discharger to clean up and abate the effects of waste discharges. The Dischargers are named in this Order because, as set forth in these findings, they have, in violation of waste discharge requirements, caused or permitted, causes or permits, threatens to cause or permit waste to be discharged or deposited where it is, or probably will be, discharged into waters of the state and creates, or threatens to create, a condition of pollution or nuisance.

10) **Basis for 13267 Requirements:** This Order requires several investigative and technical reports. The burden of the reports, including costs, bears a reasonable relationship to the need for the reports and the benefits to be obtained from the reports. Specifically, the information is necessary to implement remediation activities which will eliminate leachate discharges, which pose a threat to human health and the environment, to tributaries of the Napa River.

11) **Cost Recovery:** Pursuant to Section 13304 of the Water Code, the Discharger is hereby notified that the Regional Water Board is entitled to, and may seek reimbursement for, all reasonable costs incurred to investigate unauthorized discharge of waste and to oversee cleanup of such waste, abatement of the effect thereof, or other remedial action, as required by this Order.

12) **CEQA:** The issuance of this Order is an enforcement action taken by a regulatory agency and is exempt from the provisions of the California Environmental Quality Act, pursuant to Section 15321(a)(2), Title 14, California Code of Regulations.

12) **Notification:** The Regional Water Board has notified the Discharger, Napa County (the Local Enforcement Agency), CalRecycle, and California Department of Fish and Wildlife of its intent under Water Code section 13304 to issue this Order for the discharge. Due the urgent need to abate the continuing leachate discharges into waters of the state, which threaten public health and safety and the environment, this Order has been issued as expeditiously as possible. The Discharger can seek changes or comment on this Order once it is issued. Moreover, under Water Code section 13320, a party aggrieved by a Regional Water Board's cleanup and abatement order may petition the State Water Resources Control Board to review the Regional Water Board's action within 30 days of the Regional Water Board's action.

THEREFORE, IT IS HEREBY ORDERED that pursuant to Sections 13304 and 13267 of the California Water Code, the Discharger shall clean up and abate the effects described in the above findings and submit required technical reports as follows:

1) **CEASE ALL DISCHARGES TO THE CREEK**

COMPLIANCE DATE: Immediately

The Dischargers shall immediately cease all discharges of leachate, leachate condensate, or any water that has come in contact with leachate or landfilled refuse, from the site. All such discharges shall be captured within the landfill perimeter and contained in storage tanks designated for that purpose.

All temporary leachate storage tanks shall be labeled as such, and accurate records kept of the volume of leachate collected. The Discharger shall collect samples from each tank for analysis at a certified laboratory, submit laboratory reports electronically as they become available, and document where and how the leachate was disposed.

2) **CEASE ALL SPRAYING OF LEACHATE DURING RAIN EVENTS**

COMPLIANCE DATE: Immediately

No leachate or leachate condensate shall be sprayed on the landfill for the purpose of dust control until leachate seeping has been stopped. The waste mass in the landfill is currently saturated, as indicated by numerous leaks on the active face and around the base of the landfill, and any additional liquid sprayed onto the landfill will not be properly conveyed to the leachate collection and recovery system. Spraying of leachate for dust control shall not resume until dry conditions are re-established and until the Dischargers attain proper operation of the leachate collection and recovery system.

3) **REPORTING REQUIREMENTS**

COMPLIANCE DATE: As data becomes available

The Dischargers shall ensure that corrective actions to address all violations are implemented properly and expediently, shall submit analytical data promptly as it becomes available, and shall be responsible for providing timely and unbiased findings and facts to the Water Board, the Local Enforcement Agency, and other regulatory agencies with jurisdiction over landfill operations and discharges. It may be helpful for the Dischargers to employ an independent (third-party) consultant to help manage site operations and prepare the required reports necessary to document compliance with this Order and the landfill's WDRs.

4) **CEASE ALL LEACHATE SEEPS FROM THE ACTIVE LANDFILL AREA**

COMPLIANCE DATE: Immediately

The Dischargers shall immediately implement corrective actions to terminate leachate seeps and to prevent additional commingling of leachate with stormwater. The Dischargers shall perform all necessary maintenance to ensure that leachate is properly conveyed to the leachate collection and recovery system, does not leave containment areas, and does not pond within the base of Module 5.

5) **COLLECT CREEK SAMPLES**

COMPLIANCE DATE: Daily until leachate is no longer being discharged to the creek, and weekly through June 1, 2019

The Dischargers shall collect samples from the creek daily until leachate seepage is terminated. Samples should be analyzed for all contaminants of concern present in leachate, as well as any likely contaminants contained in fire debris (such as PFAS compounds, polyaromatic hydrocarbons, poly-chlorinated biphenyls, semi-volatile organic compounds, metals, dioxins, furans, etc.). The Dischargers shall promptly submit all analytical reports to the Water Board. If impacts to the creek are observed, the Dischargers shall submit a work plan acceptable to the Executive Officer proposing immediate mitigation measures to correct creek impacts, along with preliminary recommendations to permanently abate the discharge and clean up any long-lasting impacts to the creek, such as contamination of creek sediments.

6) **WORK PLAN TO REPAIR EROSION OF FINAL SOIL CAP ON MODULE 1 AND 2B**

COMPLIANCE DATE: May 1, 2019

A work plan, acceptable to the Executive Officer, shall be submitted to propose repair and replacement of the final cap on the side slopes of Modules 1 and 2B, where severe erosion from stormwater and leachate runoff and seepage is evident and ongoing. The work plan shall also propose trenching to determine the thickness of the cap and the location of refuse on the lower southeast portion of Module 1. It is unclear where the limit of waste mass is in this Module, and if the original final cap has been compromised by the dense foliage growing in this area.

7) **REPAIR AND REPLACE LEACHATE COLLECTION SYSTEMS**

COMPLIANCE DATE: June 1, 2019

The Dischargers shall perform a comprehensive assessment of the leachate collection and recovery and shall promptly perform all repairs necessary to resume proper operation of the system and all of its appurtenances. These repairs must be completed prior to the landfill resuming waste disposal. The concrete tanks are in clear disrepair, do not have sufficient capacity to hold leachate generated onsite, do not have dual containment to capture overflow, and were observed to be actively leaking as of April 2, 2019.

The metal condensate tank is in a similar state of disrepair, with severe rusting around the base of the tank and the surrounding soil, indicating leakage of condensate is ongoing. All tanks are required to have dual containment, adequate storage volume, and an alarm or notification system when the tanks are full. The leachate pump at LEW-2 is also severely rusted and does not work as intended. The water-truck filling station that is connected to the metal tank continuously leaks and needs a shutoff valve installed when trucks are done filling. A concrete pad, with a catchment basin below,

needs to be installed to ensure any leachate and condensate mixture is captured during filling. The Discharger shall replace and/or repair all leachate conveyance appurtenances such that leachate is contained within the landfill and releases to the creek do not occur.

8) **INSTALL STORMWATER CAPTURE AND STORAGE SYSTEM**

COMPLIANCE DATE: July 1, 2019

The Dischargers shall prepare and submit a Design Report acceptable to the Executive Officer for a system to capture, collect, and store stormwater at the site. At a minimum, the report shall consider drainage controls required to capture and convey runoff from a 100-year, 24-hour storm event.

The Dischargers shall also update the Stormwater Pollution and Prevention Plan, best management practices for keeping trash out of the stormwater and creek, and monitoring and analytical compliance with the NPDES General Industrial Stormwater Permit limits.

9) **CLEANUP PLAN**

COMPLIANCE DATE: August 30, 2019

The Dischargers shall prepare and submit a cleanup and creek restoration plan, acceptable to the Executive Officer, which details how the surface water at and leaving the landfill will be cleaned to MCLs, per State Board Resolution 92-49, as detailed in finding 6 above.

10) **DELAYED COMPLIANCE**

If the Discharger is delayed, interrupted, or prevented from meeting one or more of the completion dates specified for the above tasks, the Discharger shall promptly notify the Executive Officer, and the Regional Water Board or Executive Officer may consider revision to this Order. Other than the tasks requiring immediate compliance, the Regional Water Board recognizes the possibility that delays may occur due to other agencies' permitting requirements for proposed abatement activities.

11) Failure to comply with this Order may result in an enforcement action, including under section 13350 and 13268 of the California Water Code, which allows for administrative civil liability up to a maximum of five thousand dollars ($5,000) for each day of violation.

12) If any hazardous substance is discharged in or on any waters of the State, or discharged or deposited where it is or probably will be discharged into any water of the State, the Discharger shall report such discharge to the Water Board immediately. A written report shall be filed with the Water Board within five working days, which describes the nature of the substance, quantity released, cause and duration of release, size of affected area, and any corrective actions taken or planned to eliminate or

mitigate such release.

13) Contractor / Consultant Qualifications: All technical documents shall be signed by and stamped with the seal of a California registered geologist, a California certified engineering geologist, or a California registered civil engineer.

14) Lab Qualifications: All samples shall be analyzed by State-certified laboratories or laboratories accepted by the Regional Water Board using approved U.S. EPA methods for the type of analysis to be performed. Quality assurance/quality control (QA/QC) records shall be maintained for Regional Water Board review. This provision does not apply to analyses that can only reasonably be performed onsite (e.g., temperature).

4/10/2019
Date

Michael Montgomery
Executive Officer

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FAILURE TO COMPLY WITH THE REQUIREMENTS OF THIS ORDER MAY SUBJECT THE VISTA CORPORATION TO ENFORCEMENT ACTION, INCLUDING BUT NOT LIMITED TO: IMPOSITION OF ADMINISTRATIVE CIVIL LIABILITY UNDER WATER CODE SECTIONS 13268 OR 13350, OR REFERRAL TO THE ATTORNEY GENERAL FOR INJUNCTIVE RELIEF OR CIVIL OR CRIMINAL LIABILITY

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Attachments: Figure 1 – Site Location Map
Figure 12 – WDR Compliance Monitoring Network
Figure 26 – Landfill Modules

Photo Log from March 26, 2019

CLIENT
CLOVER FLAT LANDFILL, INC.
CALISTOGA, CALIFORNIA

CONSULTANT
GOLDER

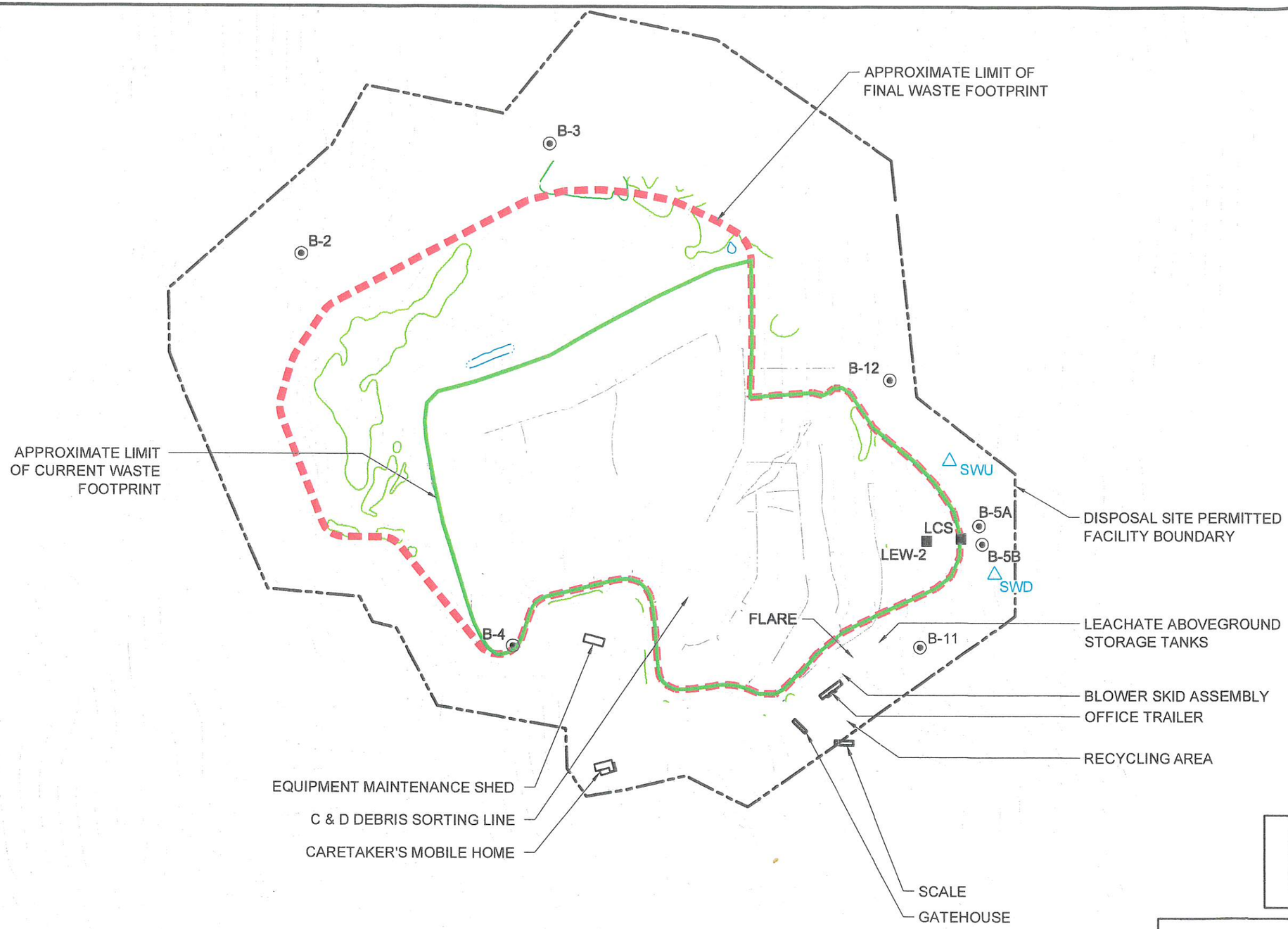
YYYY-MM-DD	2018-10-25
DESIGNED	KMM
PREPARED	KMM
REVIEWED	TLV
APPROVED	TLV

PROJECT
CLOVER FLAT LANDFILL
4380 SILVERADO TRAIL
CALISTOGA, CALIFORNIA

TITLE
FIGURE 1
SITE LOCATION MAP

PROJECT NO.
1300297-01

REV.



300 0 300

SCALE : 1" = 300'

LEGEND

B-12	GROUNDWATER MONITORING WELL
LCS	LEACHATE COLLECTION SUMP/WELL
SWU	SURFACE WATER STATION
C&D	CONSTRUCTION AND DEMOLITION

WDR COMPLIANCE MONITORING NETWORK

CLOVER FLAT LANDFILL
4380 SILVERADO TRAIL
CALISTOGA, CALIFORNIA

FIGURE 12

09-1578

EBA ENGINEERING

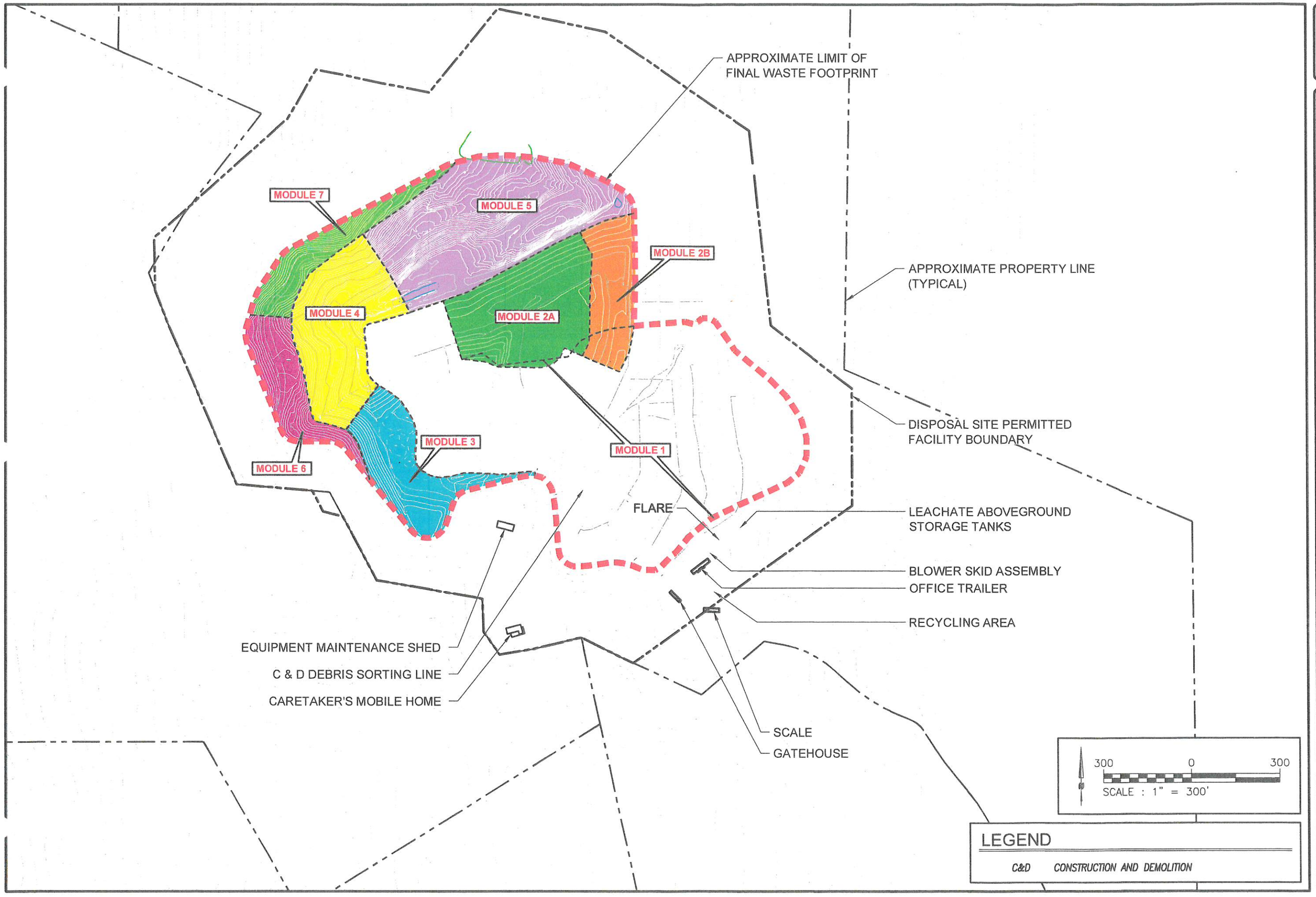


FIGURE 26 09-1578

LANDFILL MODULES

CLOVER FLAT LANDFILL
4380 SILVERADO TRAIL
CALISTOGA, CALIFORNIA

EBA ENGINEERING

U:\2009\1578\Environmental\Anual Groundwater Monitoring Report\2012 - JTD\Landfill Modules - (Rev1).dwg, Fig 26, 6/7/2012 3:01:57 PM

Clover Flat Landfill, Calistoga- Select Photos from 3/26/19 inspection

Photo 521- rust staining and leakage from the leachate condensate tank, looking northeast.

Photo 535- ponded leachate around the rusted LEW2 wellhead, looking northwest.

Clover Flat Landfill, Calistoga- Select Photos from 3/26/19 inspection

Photo 575- pipeline from the landfill into the creek, looking east.

Photo 589- black, oily-looking material flowing toward the creek, looking northeast.

Clover Flat Landfill, Calistoga- Select Photos from 3/26/19 inspection

Photo 615- erosion from stormwater and leachate overflow, leachate ponding on the bench, looking northwest.

Photo 684- active leachate seeps draining into the drop inlet, looking northwest