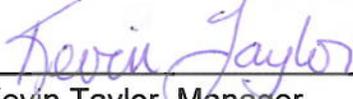


MEMORANDUM

To: Susan Markie, Chief
Permitting & Assistance Branch
Waste Permitting, Compliance & Mitigation Division

Date: February 14, 2014

From: 
Kevin Taylor, Manager
Permits & Assistance North Section
Permitting & Assistance Branch

Subject: REQUEST FOR ACTION TO REDUCE LANDFILL GAS (LFG) MONITORING
FREQUENCY FOR TECOPA LANDFILL
SWIS NO.14-AA-0007, INYO COUNTY

This is a request that the Branch Chief take action on a request from the Inyo County Local Enforcement Agency (LEA) to reduce the frequency of LFG monitoring at the Tecopa Landfill, Facility No. 14-AA-0007, located in Inyo County, from quarterly to semi-annually. The request was made pursuant to 27 CCR 20933(b):

For those MSWLF's that are permitted to accept for disposal 20 tons or less of municipal solid waste per day based on an annual average, the EA, with concurrence by the CIWMB, may reduce the frequencies for monitoring landfill gas after consideration of the unique characteristics of the MSWLF and its surroundings, climatic and hydrogeologic conditions, and protection of public health and safety and the environment. Any proposal by an operator for a reduced monitoring frequency shall be made available by the EA for public review for a minimum of 30 days to allow interested persons the opportunity to comment. The operator shall place in the operating record of the MSWLF documentation of the considerations, public comment, and EA approval and CIWMB concurrence for any alternative frequency. No reduced monitoring frequency shall be approved unless the EA and the CIWMB determine that the alternative monitoring schedule adequately protects the public health and safety and the environment. The Executive Director or the EA may condition, limit, suspend, or terminate an operator's use of an alternative monitoring frequency if s/he or it determines that the alternative frequency may cause harm to public health and safety or the environment.

The request was dated June 28, 2013, and received by CalRecycle on July 1, 2013.

Based on our review of the monitoring reduction request, staff recommends that the Program Director approve the reduction request. The reasoning is summarized in the following table.

Findings

	Findings	Acceptable	Unacceptable
Operator submitted written request for the request to reduce LFG monitoring frequency	The operator provided the written request on June 28, 2013.	<input checked="" type="checkbox"/>	
Approved Landfill Gas Plan	The facility's landfill gas plan was approved on October 14, 2009.	<input checked="" type="checkbox"/>	
Inspection Results	Tecopa has not had any violations related to the actual detection of LFG over a 10 year period.	<input checked="" type="checkbox"/>	
LFG monitoring results	Since 2001, LFG in the four probes at the facility have been measured at a low of 0.00 % to a high of 0.10%. Since 2010, (0.0% from 9/8/10) there has been no detection of LFG, since installation of the probes in the approved LFG plan.	<input checked="" type="checkbox"/>	
LEA Approval	The LEA approved the operator's request on November 4, 2011.	<input checked="" type="checkbox"/>	
Inspections and Enforcement Agency Compliance Unit review	Waste Evaluation and Enforcement Branch staff support the request as indicated in their September 19, 2013 email.	<input checked="" type="checkbox"/>	
Engineering Support Branch staff review	ESB staff support the request as indicated in their September 12, 2013 email.	<input checked="" type="checkbox"/>	
Facility is permitted for less than 20 tons per day	Facility is permitted for 1 ton per day.	<input checked="" type="checkbox"/>	
Landfill Characteristics and Surrounding	There are no structures located within 1,000 feet of the Landfill. Tecopa Landfill is located approximately one mile east of the community of Tecopa. The vast majority of land located within a one mile radius of the facility is public owned and administered by BLM. The Landfill is bordered on all sides by undeveloped open space. Although a small portion of the Tecopa town limits lies within one mile of site's boundary, there are no developments, structures, industries, businesses located within three-quarters of a mile from the facility.	<input checked="" type="checkbox"/>	
Climatic and Hydrogeologic Conditions Suitable	According to the WDRs there is no perennial surface water flow at the site. Precipitation in the area of the landfill is approximately 4 inches annually with an approximately 84 inch annual evaporation rate.	<input checked="" type="checkbox"/>	

	Findings	Acceptable	Unacceptable
Public Notice for 30 Days	A Public Notice was placed in the Inyo Register on May 1, 2013, for 30 days requesting comments. No comments were received by the LEA.	<input checked="" type="checkbox"/>	

Program Director Action:

On the basis of the information in this Request for Action and the findings set out above, the Branch Chief approves the request from the Inyo County Local Enforcement Agency (LEA) to reduce the frequency of LFG monitoring at the Tecopa Landfill, Facility No. 14-AA-0007, located in Inyo County, from quarterly to semi-annually.

Dated: February 14, 2014



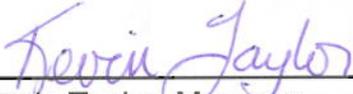
Susan Markie, Chief
Permitting and Assistance Branch

Attachment: Operator Request for Extension

MEMORANDUM

To: Susan Markie, Chief
Permitting & Assistance Branch
Waste Permitting, Compliance & Mitigation Division

Date: February 14, 2014

From: 
Kevin Taylor, Manager
Permits & Assistance North Section
Permitting & Assistance Branch

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Dated: February 14, 2014



Susan Markie, Chief
Permitting and Assistance Branch

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