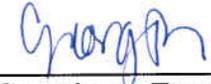


**COMPLIANCE & ENFORCEMENT DIVISION
ACTION REQUEST**

To: Ted Rauh, Deputy Director
Compliance and Enforcement Division

Through: Lorraine Van Kekerix, Branch Chief 
Waste Evaluation and Enforcement Branch

From: 
Georgianne Turner, Section Manager
Solid Waste Enforcement Section

Request Date: March 23, 2011

Action By: March 30, 2011

Decision Subject: Consideration of Approval of Final Report for the Ongoing Use of Construction and Demolition Debris Fines as an Alternative Daily Cover at the City of Paso Robles Landfill, Facility No. 40-AA-0001

SUMMARY

CalRecycle is acting as the enforcement agency (EA) for San Luis Obispo County. As part of the duties, CalRecycle is responsible for approving Alternative Daily Cover (ADC) Demonstration Projects for landfills within the jurisdiction. On August 14, 2009, the operator submitted a "Pilot Study, Use of Ground and Screened Construction Demo Debris for ADC Paso Robles Landfill". On September 10, 2009, CalRecycle (at the time CIWMB) approved the demonstration project with further clarification and conditions. On February 4, 2011, CalRecycle received a copy of the "ADC Demonstration Project, C&D Fines, Paso Robles Landfill", dated February 2, 2011, which is considered the final report documenting the observations made by the operator.

OPTIONS

1. Approve the Final Report for Ground and Screened Construction and Demolition Debris as Alternative Daily Cover at the City of Paso Robles Landfill, Facility No. 40-AA-0001.
2. Deny the Approval of the Final Report for Ground and Screened Construction and Demolition Debris as Alternative Daily Cover at the City of Paso Robles Landfill, Facility No. 40-AA-0001.
3. Approve, with additional conditions, the Final Report for Ground and Screened Construction and Demolition Debris as Alternative Daily Cover at the City of Paso Robles Landfill, Facility No. 40-AA-0001.

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ANALYSIS AND FINDINGS

Background

If a landfill operator proposes to use an ADC material not identified in Title 27 California Code of Regulations (27 CCR), Section 20690(b)(1-11), they are required to propose a site specific demonstration project and receive approval for the demonstration project from the EA to establish that the material is suitable as daily cover. During the demonstration period, the EA and operator evaluate the proposed ADC material to determine if the material controls vectors, fires, odors, blowing litter and scavenging. The cover performance standards of 27 CCR 20695 may be used by the EA when evaluating the adequacy of the ADC during the demonstration project. At the conclusion of the demonstration project, the operator prepares a final report providing a summary of the demonstration project and conclusions as to the suitability of the ADC materials. The final report is submitted to the EA and CalRecycle for approval and concurrence. If the new material is approved and the operator plans to continue the use of the material, the operator will submit an application to amend the Report of Facility Information (RFI) for processing by the EA pursuant to 27 CCR 21665, prior to its continued use. On some occasions, other permitting requirements may apply based on the RFI amendment and revised operations.

Analysis

CalRecycle staff received and reviewed the "Pilot Study, Use of Ground & Screened Construction Demo Debris for ADC Paso Robles Landfill," dated August 14, 2009. The project description proposed the use of ground and screened construction and demolition debris (C&D) "fines" to be utilized as ADC. The use of processed C&D as an ADC is currently allowed by 27 CCR 20690(b)(9). However, because the proposed C&D fines may contain materials not defined in 27 CCR 20690(b)(9)(B), a demonstration project was required. On September 10, 2009, CalRecycle approved the ADC pilot project. In addition to conducting the demonstration project as described, the City of Paso Robles Landfill was expected to:

- Meet the cover performance standards (control vectors, fires, odors, blowing litter and scavenging) or revert to soil cover or previously approved ADC. The mixing or blending of the C&D fines with other approved ADCs is not allowed as part of the demonstration project. C&D fines used as ADC will not be exposed for greater than 24 hours, and will not be applied during cover operations prior to closed days.
- Ensure that C&D fines received for use as an ADC are from a construction, demolition, inert debris processing facility or operation and meet the specifications described in the demonstration project (i.e., construction, demolition and inert debris only and maximum two inch screen).
- Record inspections and observations on the Daily Performance Log sheets each day the C&D fines are used.
- At the conclusion of the demonstration project, submit a final report which summarizes the demonstration project and conclusions as to the suitability of the C&D fines to effectively control vectors, fire, odors, blowing litter, and scavenging without presenting a threat to public health, safety, and the environment. Following the demonstration project, if the

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operator proposes to use the C&D fines on a continuous basis as an ADC, an application for a Report of Facility Information Amendment must be filed with CalRecycle in accordance with 27 CCR 21570.

Evaluation Results

The operator submitted the final report which summarized the demonstration project and concluded that C&D fines were suitable to effectively control vectors, fires, odors, blowing litter, and scavenging without presenting a threat to public health, safety, and the environment. The demonstration included a total of 28 loads of material, each ranging from 10-25 tons per load. Each load, after being placed on the active face, was inspected and a monitoring data sheet was used to track flies, mosquitoes, wasps, bees, cockroaches, rodents, birds, odor, litter, moisture content, fire potential and cover thickness. In all cases, the data sheets showed that none of these factors were observed. The observations showed that the material acted similar to soil and worked adequately with six (6) inches depth. Since no flies were observed, the Fly Grill was not used.

The demonstration project occurred from October 2009 to October 2010. During this time, CalRecycle staff performed monthly inspections and verified that the operator was in compliance with the project description and the additional conditions given in the approval. Additionally, staff did not observe flies, mosquitoes, wasps, bees, cockroaches, rodents, birds, odor, litter, moisture content, or concerns of fire in relation to the ADC.

RECOMMENDATION:

Staff evaluated the project and determined that no additional demonstration is necessary and is recommending approval of the final report for the continued use of C&D fines as ADC at the facility after the proper permit approvals have been granted.

DEPUTY DIRECTOR ACTION:

On the basis of the information in this Request for Action, I hereby approve the final report and the continued use of C&D fines as an ADC at the City of Paso Robles Landfill.

Dated:



Ted Rauh, Deputy Director
Compliance and Enforcement Division
CalRecycle

