



August 4, 2016

Mr. Jeffrey Marshall, R.E.H.S
Kern County Environmental Health Division
2700 'M' Street, Suite 300
Bakersfield, CA 93301

SUBJECT: Emergency Waiver of Standards – Bakersfield Metropolitan (Bena) Sanitary Landfill, SWFP #15-AA-0273

The Kern County Board of Supervisors adopted a Resolution on June 28, 2016 declaring a Local Emergency in response to the Erskine Fire. Please consider this a formal request by the Kern County Public Works Department (KCPWD), operator of the Bakersfield Metropolitan (Bena) Sanitary Landfill (SLF), to institute the emergency regulations as cited in Title 14 of the California Code of Regulations (CCR). This request is in response to the need to provide additional solid waste and disaster-related services to the public and Erskine Fire victims. Specific information required by Title 14 CCR is as follows:

1. A listing of the existing solid waste facilities permit terms and conditions to be waived in order to facilitate recovery and disposal of disaster debris in the event of a declared disaster or emergency

The KCPWD requests a waiver to operate the landfill outside the current and permitted hours of operation from 5:00 AM to 7:00 PM. These additional hours of operation will assist with the handling and management of disaster debris. Current hours of operations, as described in the Joint Technical Document, for haulers, municipalities, and customers with wastes requiring special handling are Monday through Friday from 6:00 AM to 8:00 AM and on Saturdays from 7:00 AM to 8:00 AM. The site closes to all customers 4:00 PM. The permitted hours of operation, as stated on #15-AA-0273, are Monday through Sunday from no earlier than 6:00 AM to no later than 6:00 PM.

The management of debris resulting from cleanup of properties affected by the Erskine Fire will be handled and transported by a CalRecycle approved hauler. It is difficult to estimate at this time the amount of disaster-related debris that may be incoming to the

landfill. **Therefore, the KCPWD requests a waiver to exceed the permitted maximum tonnage of 4,500 tons per day and the permitted traffic volume of 3,400 vehicles per day.** Due to the characterization of the debris that will be disposed of, no debris will be diverted and will be sent directly for disposal only. Erskine Fire debris may contain pollutants such as metals, asbestos, low-pH ash, pesticides, pool chemicals, household cleaners, and other compounds associated with a burned residential area.

The debris removal process is planned to be a 5 days per week operation and is expected to be incoming during and outside current hours of operations. **In order to maintain operational efficiency and cost effectiveness at the landfill, KCPWD requests a waiver of daily cover requirements at the separate working face.** Debris will be handled at a separate working face, away from the active working face and site customers. Incoming debris will be in compliance with the CalOES Erskine Operation Plan, requiring debris to be double "burrito" wrapped and sealed. Since debris will be wrapped, it is expected that vectors, fires, odors, litter, or scavenging will be controlled. Incoming debris will be placed sequentially at the working face and set in a fashion to maximize air space density. Debris will be surveyed upon final placement so that location of debris is known. The separate working face will be covered at the end of the project operational week. The separate working face will be monitored by KCPWD and contractor personnel for items stated above.

2. A statement of the remaining disposal capacity of the solid waste disposal facility at the time of the request

Based on recent calculations, the approximate remaining disposal capacity of Bena SLF is 31,159,418 cubic yards.

3. A description of all facility-related diversion programs and on-site recycling facilities

Due to the nature of the incoming debris, facility-related diversion programs and on-site recycling facilities will not be utilized.

4. A listing of locally approved temporary transfer or processing sites to be used to store disaster debris for future reuse or recycling

No locally-approved temporary transfer or processing sites will be used to store disaster debris for future reuse or recycling.

If you have any questions or require additional information, please contact Brian Klatt at (661) 862-8940 or Terence Dozier at (661) 862-8994.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ronelle Candia". The signature is fluid and cursive, with the first name "Ronelle" and last name "Candia" clearly distinguishable.

Ronelle Candia
Waste Management Supervisor