October 24, 2016

Don Litchfield, General Manager
WCCSL Organic Materials Processing Facility
1 Parr Boulevard
Richmond, CA 94801

Subject: Conditional Approval of Organic Pile Screening Work Plan
WCCSL Organic Materials Processing Facility, Facility No. 07-AA-0044

Dear Mr. Litchfield:

Contra Costa Environmental Health, as the Local Enforcement Agency (LEA), received WCCSL Organic Materials Processing Facility’s (WCCSL OMPF) proposed Organic Pile Screening Work Plan on October 13, 2016. The due date to submit the plan to the LEA was October 7, 2016. The LEA has reviewed and is conditionally approving your plan for the removal of the subject organic pile. In addition to what is described in the work plan, the LEA is requiring the following:

1. All odors are to be prevented.

2. The Odor Mitigation Program will be initiated each work day of operation and when necessary to prevent odor migration off site.

3. Processed material is to be monitored 24 hours per day/ 7 days per week for odors. The facility shall prevent odors from occurring.

4. All materials are to be monitored 24 hours per day/ 7 days per week for fires. The facility shall prevent fires or other combustion events from occurring.

5. All residuals and overs are to be removed from the facility. None of this material may be used at the facility or at West Contra Costa Sanitary Landfill.

6. All residuals and overs will be treated with the deodorizer prior to leaving the facility to prevent odors in neighboring areas. All loads are to be covered before leaving the site.

7. Screening of material shall cease if odors are detected or escaping wind-blown litter is observed.

8. Once material is screened, the overs must be removed within 7 days.
9. If at any time the amount of screened material on site from the anaerobic pile reaches 2,000 cubic yards, all screening shall stop until the material is gone. Screened material from the anaerobic pile shall not be stockpiled on site.

10. Comply with the Odor Impact Minimization Plan (OIMP) in RFI Appendix L and all applicable laws and regulations.

11. Everyone who works or will work at the WCCSL OMPF must review the OIMP and the operator is to provide proof to the LEA that this has been accomplished by November 4, 2016.

12. Material shall be taken to a facility or other location that can lawfully accept the material.

13. Record keeping requirements:
   a. Amount of material processed each day
   b. Amount of material removed each day
   c. Where material went – type of material (overs, mulch, compost, etc.), facility name and how much is delivered to them and for what purpose
   d. Provide verification that final product is actually leaving the site (i.e. receipts).
   e. Provide these records to the LEA weekly (i.e. if processed October 24-28 (Monday through Friday), the report is due by 7:00 AM on Monday, October 31)

14. Provide copies of laboratory results for testing of final compost for pathogens and metal concentrations within 48 hours of receipt.

15. Prior to the commencement of screening and removal of the anaerobic pile material, contact the LEA and BAAQMD. The LEA shall be present the first day of operation to observe the process and use of odor control methods. The BAAQMD shall also be given the opportunity to be present.

This letter is now part of the work plan. WCCSL OMPF may begin processing the material with the receipt of this letter and the compliance with 15. above.

Should you have any questions, please contact me at (925) 692-2528.

Sincerely,

[Signature]

Lori Braunesreither, REHS
Environmental Health Specialist II

cc: William B. Walker, M.D., Director and Health Officer Contra Costa Health Services
    Marilyn Underwood, PhD, Director, Environmental Health
    Joe Doser, Supervising Environmental Health Specialist
    Cleet Carlton, Regional Water Quality Control Board
    (email to: cleet.carlton@waterboards.ca.gov)
Doug Brewer, West Contra Costa Sanitary Landfill
Peter Nuti, West Contra Costa Sanitary Landfill
Stan Hakes, West CC Integrated Waste Management Authority
Mary Beth Byrne, West Contra Costa Sanitary Landfill
Andrea Vildivia, West Contra Costa Sanitary Landfill
Chris Olivas, West Contra Costa Sanitary Landfill
(email to: colivas@republicservices.com)
David Brockbank, Contra Costa County Department of Conservation and Development
Chris Castanchoa, Richmond Planning Department and Building Services
Quentin Malloy, Bay Area Air Quality Management District
Simon Winer, Bay Area Air Quality Management District
Ron Pilkington, Bay Area Air Quality Management District
Deidra Dingman, Contra Costa Department of Conservation and Development
October 13, 2016

Lori J. Braunesreither
Senior Environmental Health Specialist
Contra Costa Health Services (LEA)
2120 Diamond Blvd, Suite 200
Concord, California 94520

RE: Organics Pile Screening Work Plan

This letter is in response to your request for a Work Plan to address the screening and management of organics on the eastern edge half of the compost deck at our West Contra Costa County Organics Management Facility (WCCSL OMPF). The Action Plan is in line with the overview provided to you and Mr. Simon Winer of the Bay Area Air Quality Management District (BAAQMD) on October 12, 2016 during an on-site meeting.

The plan will employ the use of a third-party contractor to incrementally screen the material and transport compost over to our Keller Canyon Landfill for use as ADC and prepare the finished compost for re-use off-site. Concurrent with this activity, the WCCSL OMPF will be implementing a comprehensive Odor Mitigation Program to minimize the potential for odor migration from the site. This program will complement the facility Odor Impact Minimization Plan, which is part of the WCCSL OMPF Report of Facility Information (RFI).

Work Plan

Screening of the subject pile will be conducted using the following equipment dedicated to this operation:

- 2 Trommel Screens dedicated to processing material on eastern deck
- Bucket Loader
- Water Truck and/or Water Storage Tank
- Articulated Dump Truck
- Odor Mitigation/Misting System

While this is believed to be appropriate for the scale of the removal effort and space limitations, WCCSL may use additional or alternative equipment, depending on the need.
The plan for management of the material is as follows:

- Based on weather conditions (e.g., wind speed, wind direction, temperature, etc.) the Odor Mitigation System will be initiated (explanation to follow).
- The Bucket Loader operator will remove buckets of organics from the subject pile and place the material into the hopper/feeder of either trommel screen.
- The compost will be screened into two piles: finished compost and "overs".
- The finished compost and overs will be relocated as needed using the Bucket Loader to segregated piles for final endpoint delivery (explanation to follow). At no time will the finished compost or overs be combined with similar existing piles on the facility.
- All overs generated from the subject pile will be removed from the facility in accordance with our permits.

**Odor Mitigation**

The Odor Mitigation System will be initiated each work day of operation or when necessary to limit odor migration off-site. This system consists of both portable and permanent components, as well as operational procedures and will be in use through the conclusion of the project.

The Odor Mitigation System will consist of the following:

- The subject material pile volume will be removed from the eastern face of the pile, incrementally, to limit exposed surface to odor emissions.
- Screened materials will be kept separate from other screened materials on-site.
- Mobile and permanent odor control components. The WCCSL OMPF will use odor control device(s) manufactured by NCM Odor and Dust Control. Features include:
  - The NCM system uses a mobile platform, but also allows permanent atomizer connection/application where necessary.
  - The platform includes a water storage tank and an automated chemical injection pump where no pre-dilution into the water tank is required.
  - This system will use either SL-1000 or SL-4000 Odor Suppressant (SDS Sheets attached)
  - Normal use dilution range for SL-1000 is one part to between 500 and 1,000 parts of water. This can be automatically adjusted in the field when necessary.
Normal use dilution range for SL-4000 is one part to between 1,000 and 1,500 parts of water. This can be automatically adjusted in the field when necessary.

- Application can be with atomizers, fan application (over a wider area) or direct application on the excavation face through use of the on-site water truck.
- Additional information may be found at www.ncmodorcontrol.com

- WCCC/L OMPF will conduct active odor screening and checks at work zone, facility perimeter, and neighboring roads and communities.
- WCCC/L OMPF will restrict operations to Monday through Friday, during normal business hours for the Transfer Station and OMPF. No nighttime or weekend operations will occur during this project.
- WCCC/L OMPF will comply with the existing Odor Impact Minimization Plan (OIMP), including Odor Monitoring and Complaint Response Protocols.
  - The OIMP includes protocols for investigating and verifying any odor complaints and implementing operational changes to minimize odors.
  - Documentation examples, as well as protocols with meeting with the LEA and complainant are included in the OIMP and will be initiated if odor complaints should occur during this project.

Removal of Screened Components.

The screened material will consist of finished compost and overs. The final phase of the process will be transport of residual and overs to endpoint destinations.

Finished Material Removal and Transport:

- As stated previously, with the exception of a limited amount of processed material, all residual and overs generated from the subject pile will be removed from the facility in accordance with our permits.
- Finished Compost will be inventoried for marketing to end users.
- Although Finished Compost rarely exhibits objectionable odor, the Finished Compost will be monitored for objectionable odors. If required the Finished Compost may receive an application of SL-1000 or SL-4000 suppressant/neutralizer.
Overs Removal and Transport:

- As stated previously, with the exception of a limited amount of processed material, all overs material generated from the subject pile will be removed from the facility in accordance with our permits.
- Overs will be loaded into standard MSW transfer trucks and transported to Keller Landfill, located in Pittsburg, California, and unloaded using an existing tipper unit at the site.

Schedule

A survey of the organic material on the eastern deck was conducted on October 11, 2016. The estimate of the volume remaining was found to be approximately 32,412 cubic yards. The certification letter and results from this survey are included as an attachment.

With an estimated processing rate with two (2) trommel screeners of 1,000 in place cubic yards per day, the estimated completion time is approximately 33 working days. This may, of course, be extended further should inclement weather occur.

Please feel free to contact me at (209) 684-4733 if you have any questions or comments regarding this response.

Republic Services, Inc.

Don Litchfield
General Manager
West Contra Costa County Sanitary Landfill, OMPF

Attachments: 1. SDS SL-1000, SL-4000 Odor Suppressant/Neutralizer
2. Survey Results/Certification – October 11, 2016