February 3, 2017

West Contra Costa Sanitary Landfill
Attn: Daryl Smith
P.O. Box 4100
Richmond, California 94804

Re: LEA Inspection of WCCSL Organic Materials Processing Facility,
Facility No. 07-AA-0044

Dear Mr. Smith:

Contra Costa Environmental Health, as the Local Enforcement Agency (LEA) for solid waste, conducted a routine inspection of the above referenced facility and the facility's Wet Waste/Dusty Material Operation (aka Waste Solidification Operation) on January 31, 2017. The LEA conducted focused inspections of the above referenced facility on January 5, 13, 18, and 25, 2017. Copies of the inspection reports are attached for your records.

If you should have any questions regarding the content of the attached report or related compliance issues, please contact me at (925) 692-2569.

Sincerely,

[Signature]

Agnes T. Vinlcan, R.E.H.S.
Environmental Health Specialist II

Enclosures

cc w/ Enclosures: 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 Castanchoa, Richmond Planning Department and Building Services
Ron Pilkington, Bay Area Air Quality Management District
Quentin Malloy, Bay Area Air Quality Management District
Deidra Dingman, Contra Costa County Department of Conservation and Development
ATV:tf
**Composting Materials Handling Operation and Facility Inspection Report (93)**

<table>
<thead>
<tr>
<th>Procedure Details</th>
<th>Details</th>
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</thead>
<tbody>
<tr>
<td><strong>Enforcement Agency:</strong></td>
<td>County of Contra Costa</td>
</tr>
<tr>
<td><strong>SWIS Facility File Number (99-xx-9999):</strong></td>
<td>07-AA-0044</td>
</tr>
<tr>
<td><strong>Inspection Date:</strong></td>
<td>1/31/2017</td>
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<tr>
<td><strong>Program Code:</strong></td>
<td>LEA Periodic</td>
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<tr>
<td><strong>Time In:</strong></td>
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<td><strong>Time Out:</strong></td>
<td>1600</td>
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<tr>
<td><strong>Inspection Time:</strong></td>
<td>3 hours 15 min</td>
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<tr>
<td><strong>Facility Name:</strong></td>
<td>WCCSLF Organic Materials Processing</td>
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<tr>
<td><strong>Owner Name:</strong></td>
<td>West Contra Costa Sanitary Landfill Inc</td>
</tr>
<tr>
<td><strong>Facility Location:</strong></td>
<td>Foot Of Parr Blvd., Richmond 94801</td>
</tr>
<tr>
<td><strong>Inspector:</strong></td>
<td>Agnes T. Vinuian</td>
</tr>
<tr>
<td><strong>Also Present (Name):</strong></td>
<td>See below</td>
</tr>
</tbody>
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**Inspection Report Comments:**

1. The purpose of this visit was to conduct a monthly inspection. This included a joint site visit with representatives from CalRecycle, Republic Services (RS) and the LEA (Local Enforcement Agency), and a meeting as requested by RS regarding the Notice & Order issued by Dr. Marilyn Underwood, Director of Environmental Health to RS on January 24, 2017 at the City of Richmond's City Council meeting.

2. The following were in attendance for the meeting (held offsite) and site visit:
   - LEA - Dr. M. Underwood, J. Doser and A. Vinuian.
   - CalRecycle: M. DeBie, H. Branch (Sr. Attorney).

The Wet Wastes/Dusty Materials facility has not begun operations.
## Composting Materials Handling Operation and Facility Inspection Report (93)

**Enforcement Agency:** County of Contra Costa  
**SWIS Facility File Number (99-xx-9999):** 07-AA-0044  
**Inspection Date:** 1/31/2017  
**Program Code:** LEA Periodic  

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</tbody>
</table>

**Facility Name:** WCCSLF Organic Materials Processing  
**Owner Name:** West Contra Costa Sanitary Landfill Inc  
**Facility Location:** Foot Of Parr Blvd., Richmond 94801  
**Inspector:** Agnes T. Vinluan  
**Notes:**

The above facility was inspected for compliance with applicable sections of Division 96 of Public Resources Code (PRC) and Title 14 and Title 27 California Code of Regulations (CCR).

### No Violations or Areas of Concern

<table>
<thead>
<tr>
<th>V</th>
<th>A</th>
<th>Regulations</th>
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</thead>
<tbody>
<tr>
<td>X</td>
<td></td>
<td>17867(a)(9) - Fire Prevention, Protection and Control</td>
</tr>
</tbody>
</table>

**Comments:** Violation(s): Facility records for the CASP indicate temperatures measured as high as 182 degrees Fahrenheit on January 14, 2017.

Corrective Action(s): Active compost and other combustible materials onsite shall be maintained so as to prevent fires and other types of combustion events. The operator is encouraged to incorporate into its current practices, and eventually into the revised RFI, a maximum allowable temperature that results in actions to cool pile temperatures.

Note(s):
1. Facility records for the CASP were either not adequately labeled (i.e. pile numbers), illegible or missing information (aeration, oxygen, and moisture measurements).
2. Manual for the CASP system is still in DRAFT form by Cornerstone.

| X |   | 17867(a)(13) - Leachate Control |

**Comments:** Violation(s): This site does not currently have a leachate control system.

Corrective Action(s): Provide an approved and acceptable form of leachate control.

Note(s):
Due to rainfall events, this site was very muddy and had significant ponding throughout.
17869(a) - Inspection of Records

Comments: Violation(s): Records not readily accessible and missing records.

1.) Some of the January 2017 records for temperatures of manually turned windrows and temperatures, moisture, aeration, etc. for the CASP was either illegible, inadequate or missing.
2.) All the January 2017 records for special occurrences, complaints, odors, load checking were not readily available.

Corrective Action(s): Provide and maintain current, accurate, and legible records for this operation. The records must be readily available for inspection by the LEA and kept at one location for at least 5 years.

Note(s):
1.) The following records that were available were reviewed - special occurrence log, complaint log, odor log, incoming/outgoing records, load checking, temperature logs, and records for the CASPs.
2.) Incoming records indicated that organic material was received on January 26, 27 and 30, 2017 after the Notice and Order on January 24, 2017 was issued.
3.) Temperature logs for "Stockpiles" and manually turned windrows appeared to be incorrect; between January 4-20, the year indicated on the documents were the year 2016; for the manually turned windrows, the same dates were also for the year 2016, and only gave temperature readings for windrows #1-12. There are currently 23 manually turned windrows. Temperature readings for some of the unscreened compost "Stockpile" temperatures, listed with a 2016 year, were recorded as high as 216 degrees Fahrenheit (see fire control violation in this report). I asked both D. Smith and D. Brewer to verify.

Additional violation(s): 17407.3 - Drainage Control: The unpaved site is severely impacted by rainfall (i.e., muddy conditions and ponding).
Corrective Action(s): Provide proper drainage control for the site.
Note(s): During the meeting the Operator indicated that their working on a drainage plan for the site.

General Comment(s):

1.) The purpose of this visit was to conduct a monthly inspection. This included a joint site visit with representatives from CalRecycle, Republic Services (RS) and the LEA (Local Enforcement Agency), and a meeting as requested by RS regarding the Notice & Order issued by Dr. Marilyn Underwood, Director of Environmental Health to RS on January 24, 2017 at the City of Richmond's City Council meeting.
2.) The following were in attendance for the meeting (held offsite) and site visit:
LEA - Dr. M. Underwood, J. Doser and A. Vinluan.
CalRecycle: M. DeBie, H. Branch (Sr. Attorney).
3.) During the meeting, S. Gordon requested the use of a Stipulated Order to replace the current Notice and Order, something that both the LEA and RS would need to agree to the terms and conditions of and sign. M. DeBie and H. Branch agreed that this would stop the clock for the hearing that is currently in effect. The LEA indicated they will consider this request and get back to RS.
4.) Temperatures of manually turned windrows were taken by A. Vinluan for windrows #2-4, 10-14, 17 & 23. Temperatures were also taken for an "overs" pile and curing piles 1, 3, & 4. Temperatures ranged from 90-140 degrees Fahrenheit.
5.) The LEA did not check training this visit.
**Composting Materials Handling Operation and Facility Inspection Report (93)**

Enforcement Agency: County of Contra Costa

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<th>SWIS Facility File Number (99-xx-9999)</th>
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<th>Program Code</th>
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<td>07-AA-0044</td>
<td>1/25/2017</td>
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Facility Name: WCCSLF Organic Materials Processing

Owner Name: West Contra Costa Sanitary Landfill Inc

Facility Location: Foot Of Parr Blvd., Richmond 94801

Inspector: Agnes T. Vinluan

Also Present (Name): K. Roberson & C. Carlton (RWQCB) & D. Smith (Repub)

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**No Violations or Areas of Concern**

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<tr>
<th>V</th>
<th>A</th>
<th>Regulations</th>
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<td>X</td>
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<td>17867(a)(13) - Leachate Control</td>
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Comments: Violation(s): The facility does not have a leachate control system for the compost operation.

Corrective Action(s): The facility must provide an approved leachate control system for the compost operation.

Note(s): In addition to leachate control, the site has very poor drainage after inclement weather events.

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**Inspection Report Comments:**

Additional violation(s): 17407.3 - Drainage Control: The unpaved site is severely impacted by rainfall (i.e., muddy conditions and ponding).

Corrective Action(s): Provide proper drainage control for the site.

**General Note(s):**

1.) The purpose of this focused inspection was to conduct a joint inspection with representatives from the Regional Water Quality Control Board (RWQCB) and attempt to determine the volume of organic material on-site.

2.) A Notice & Order (in the form of a Cease and Desist) was issued to Republic Services on January 24, 2017 at the City Council Meeting by Dr. Marilyn Underwood, Director of Environmental Health for this facility. See attached document.

3.) Due to rainfall events, the site conditions were very muddy and had significant ponding throughout. Access by foot and vehicle was difficult, and in some areas knee deep in mud and water.

4.) Due to these conditions stated in number 3.) above, limited temperature readings were taken for both the manually turned windrows and the CASPs. Measurements to determine volumes of organic matter was not performed.

5.) The first bunker ASP (pile #1) was measured at 100 degrees Fahrenheit; pile #4 at 95 degrees Fahrenheit. Photos taken.

6.) A Vinluan walked along the south end of the top deck beside manually turned windrows #10-14. A. Vinluan noticed very bad odors (similar to decaying matter and "sour"). A Vinluan informed D. Smith about the odors and to take the necessary precautions to prevent nuisance odors especially during the screening process of these windrows.

7.) A. Vinluan walked the north slope of the landfill (due to very muddy and significant ponded conditions) on the top deck noted above. A Vinluan, C. Carlton and K. Roberson observed runoff daylighting along the north slope. Photos taken.
Composting Materials Handling Operation and Facility Inspection Report (93)

Enforcement Agency: County of Contra Costa

SWIS Facility File Number (99-xx-9999) | Inspection Date | Program Code
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07-AA-0044 | 1/18/2017 | LEA Focused

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Facility Name: WCCSLF Organic Materials Processing
Owner Name: West Contra Costa Sanitary Landfill Inc

Inspector: Agnes T. Vinluan

Also Present (Name): D. Smith and D. Brewer

No Violations or Areas of Concern

V | A | Regulations
---|---|---
X | 17867(a)(13) - Leachate Control

Comments: Violation(s): This facility does not have a leachate control system
Corrective action(s): This facility must provide an adequate leachate control system.

Note(s):
1.) During the site visit, there was very heavy rain, ponding, very muddy conditions and high winds. Photos taken.

Inspection Report Comments:

Additional Violation(s):

1. 17407.3 (a)(5) - Drainage control - Recent rainfall has interfered with site operations. The facility is unable to utilize the Scarab windrow turner or place material in the CASPs.

Corrective action(s): Facility must have sufficient drainage and/or surfaces to allow operation during all anticipated conditions.

General Note(s):

1.) The purpose of this site visit was to measure the existing organic material to verify permit conditions and the current RFI document. Due to extreme weather conditions (high winds, heavy rain, heavy ponding and muddy conditions), data collection was limited.

2.) With the exception of the feedstock, A. Vinluan was unable to fully measure the materials. These were the measurements that were taken:

- Unprocessed feedstock - 131,040 cubic-feet (4,853 cubic yards)
- Processed feedstock - 287,120 cubic-feet (9,893 cubic yards)
- Total feedstock - 14,746 cubic-yards

- Finished Compost Pile #2 - 58,752 cubic-feet (2,176 cubic-yards)
- Finished Compost Pile #1 - Unable to get any measurements
- "Curing" compost - Unable to get any measurements
- Active compost - Unable to get any measurements

3.) Manually turned windrows and CASPs were not accessible for measuring at this time.

4.) When conditions are more favorable, the LEA will get complete measurements.

5.) The operator reported to the LEA that they’ve been diverting some of the feedstock to landfilling because they were reportedly unable to use the material to construct the CASPs due to weather conditions and site conditions (i.e., muddy conditions, high winds, and ponding).
Composting Materials Handling Operation and Facility Inspection Report (93)

Enforcement Agency: County of Contra Costa

SWIS Facility File Number (99-xx-9999) 07-AA-0044  Inspection Date 1/13/2017  Program Code LEA Focused

Time In 1030  Time Out 1200  Inspection Time: 1.5 hours

Facility Name WCSSLF Organic Materials Processing

Facility Location Foot Of Parr Blvd., Richmond 94801

Inspector Agnes T. Vinluan

Also Present (Name) Takeya Foster (CCEH), D. Brewer

No Violations or Areas of Concern

V A Regulations
X 17867(a)(13) - Leachate Control

Comments: Violation(s): Facility does not have a compost leachate system.

Corrective Action(s): Facility must provide an approved leachate collection system.

Note(s): There has been significant recent rainfall at the site.

Inspection Report Comments:

Additional Violation(s):

1. 17407.3 (a)(5) - Drainage control - Recent rainfall has interfered with site operations. The facility is unable to utilize the Scarab windrow turner or place material in the CASPs.

General Note(s):

1.) The purpose of this focused inspection was to observe the compost operation after the very heavy rainfall. Inspection was conducted with Doug Brewer, Environmental Compliance Manager. The LEA observed muddy conditions and ponding at the site.

2.) In CASP bunker #1, the first piles that were constructed (piles 1-5) were deconstructed and moved to the curing pile area.

3.) The newest piles in the CASP were monitored for temperatures and the LEA (A. Vinluan) observed to be approximately 140 degrees Fahrenheit.

4.) LEA (A. Vinluan) took temperatures of the manually turned windrows #9 and #10 and found these to be 140 and 150 degrees respectively.

5.) LEA (A. Vinluan) asked D. Brewer about the amount of processed and unprocessed feedstock onsite. D. Brewer stated that there were problems in constructing the CASPs using the feedstock, and that there was a backlog due to muddy conditions. When LEA (A. Vinluan) asked D. Brewer when this would be removed, he stated that the facility would be removing it from this site and taking it to a licensed solid waste facility. No date was given for removal.

6.) Cornerstone Environmental Group (Maura Dougherty, P.E.) provided the LEA a draft Manual Operational Plan for WCCSSL-OMPF's CASP via e-mail on January 11, 2017. The LEA is currently reviewing this document.

7.) Cornerstone Environmental Group (Mukonde Chama, P.E.) provided the LEA an Odor Best Management Practices Feasibility Study for WCCSSL-OMPF via an e-mail on January 3, 2017. The LEA is currently reviewing this document with CalRecycle and will be providing a response to the facility.
# Composting Materials Handling Operation and Facility Inspection Report (93)

**Enforcement Agency:** County of Contra Costa

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<td>WCSSLF Organic Materials Processing</td>
<td>West Contra Costa Sanitary Landfill Inc</td>
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<table>
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<tr>
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<tr>
<td>Foot Of Parr Blvd., Richmond</td>
<td>94801</td>
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<tr>
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<th>Also Present (Name)</th>
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<tr>
<td>Agnes T. Vnluan</td>
<td>M. Gibbs, Anthony, D. Brewer (Republic Services)</td>
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**No Violations or Areas of Concern**

<table>
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<td>17867(a)(9)</td>
<td>- Fire Prevention, Protection and Control</td>
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</table>

**Comments:**
Violation(s): ASP #15 temperatures was measured at 170-180 degrees Fahrenheit; ASP piles #1 and #2, which were constructed on November 23, 2016, were measured at 150-160 degrees Fahrenheit.

Corrective action(s): Active compost and other combustible materials onsite shall be maintained so as to prevent fires and other types combustion events. Representative temperatures of piles shall be taken and documented, pile sizes shall be kept within the parameters specified in the RFI, and pile turnings shall comply with the applicable standards. The operator is encouraged to incorporate into its current practices, and eventually into a revised RFI, a maximum allowable temperature that results in actions to cool pile temperatures.

Note(s):

1.) Per facility operator, D. Brewer, ASP #1 and #2 were supposed to have completed the composting process within 23-25 days. Elevated temperatures are an indication that the compost process is not complete.

2.) According to research regarding this system, if the compost is managed properly, it should finish its compost cycle within 23-25 days, provided all factors have been properly managed (e.g., Carbon/Nitrogen ratio, oxygen, moisture, etc.) As of date, this pile is the oldest in this system and has not yet completed the cycle.

3.) Per D. Brewer, this ASP #1 and #2 were "experimental" piles constructed with woody material at the base of the pile, and also have a different and larger configuration than the other piles noted in the bunkers. The LEA informed D. Brewer that this pile must be removed and managed so that it will maintain aerobic conditions, and if still possible, complete the compost cycle. Otherwise, it is to be removed and properly disposed of to a permitted facility.

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**Comments:**
Violation(s): Facility does not have a compost leachate collection and removal system.

Corrective action(s): Facility must provide an approved leachate collection and removal system.

Note(s):

1.) There has been significant recent rainfall at the site.

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<thead>
<tr>
<th>Regulation</th>
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<tr>
<td>17867.5</td>
<td>- Personnel Training</td>
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**Comments:**
Violation(s): The LEA has not received the requested details regarding the Aerated Static Pile (ASP) system operation and maintenance. The operator did not have any employee training records available regarding this system for review.

Corrective action(s): Provide the requested information regarding the operation and maintenance of the ASP system and implement a training program for facility staff on these details. Document and maintain training records for review by the LEA upon request. Facility must demonstrate adequate knowledge.
<table>
<thead>
<tr>
<th>X</th>
<th>17868.3(c) - Windrow/Aerated Static Pile Temperature Monitoring</th>
</tr>
</thead>
<tbody>
<tr>
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<td>3.)</td>
<td>Per D. Brewer, this ASP #1 and #2 were &quot;experimental&quot; piles constructed with woody material at the base of the pile, and also have a different and larger configuration than the other piles noted in the bunkers. The LEA informed D. Brewer that this pile must be removed and managed so that it will maintain aerobic conditions, and if still possible, complete the compost cycle. Otherwise, it is to be removed and properly disposed of to a permitted facility.</td>
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<th>17869(h) - Training Records</th>
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<td>Comments: Violation(s): The LEA has not received the requested details regarding the Aerated Static Pile (ASP) system operation and maintenance. The operator did not have any employee training records available for review by the LEA.</td>
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<td>Corrective action(s): Provide the requested information regarding the operation and maintenance of the ASP system and implement a training program for facility staff on these details. Document and maintain training records for review by the LEA upon request.</td>
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**Inspection Report Comments:**

1.) The purpose of the focused inspection was to follow-up with ASP temperatures and leachate.