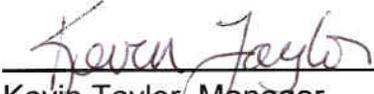


MEMORANDUM

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

Date: February 7, 2014

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

Subject: REQUEST FOR ACTION TO REDUCE LANDFILL GAS (LFG) MONITORING
FREQUENCY FOR SHOSHONE LANDFILL
SWIS NO.14-AA-0006, 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 Shoshone Landfill, Facility No. 14-AA-0006, 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 Branch Chief approve the reduction request. The reasoning is summarized in the following table.

Findings

	Findings	Acceptable	Unacceptable
Operator submitted written 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 November 24, 2009.	<input checked="" type="checkbox"/>	
Inspection Results	Shoshone has not had any violations related to the 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 0.16%. Since 2010, there has been no detection of LFG, (0.0% from 9/8/10), since installation of the probes under 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 an e-mail dated September 19, 2013.	<input checked="" type="checkbox"/>	
Engineering Support Branch staff review	Engineering Services Branch support the request as indicated in an e-mail dated September 12, 2013.	<input checked="" type="checkbox"/>	
Facility is permitted for less than 20 tons per day	Facility is permitted for one ton per day.	<input checked="" type="checkbox"/>	
Landfill Characteristics and Surrounding	Shoshone Landfill is located one and a half miles from the town of Shoshone. The landfill has been closed to the public since 1998, and only minimal waste generated by the Inyo County Road Department is currently disposed at the site (1-2 tons per year). The landfill is approximately one mile from the closest dwelling, and the area within 1,000 feet of the landfill has been designed as Open Space.	<input checked="" type="checkbox"/>	
Climatic and Hydrogeologic Conditions Suitable	According to the WDR for the site, the Amargosa River is located approximately one-half mile away and 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"/>	

Branch Chief 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 Shoshone Landfill, Facility No. 14-AA-0006, located in Inyo County, from quarterly to semi-annually.

Dated: February 7, 2014



Susan Markie, Chief
Permitting & Assistance Branch

Attachment: Operator Request for Extension

