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STANISLAUS CO. CLERK RECORDER
Adam Loera

STANISLAUS COUNTY
DEPARTMENT OF ENVIRONMENTAL RESOURCES
3800 Cornucopia Way, Suite C
Modesto, CA 95358

NOTICE OF EXEMPTION

Project Title: Fink Road Landfill Gas Collection and Control System Expansion

Applicant Information: Stanislaus County Department of Environmental Resources, 3800 Cornucopia Way, Suite C, Modesto, CA 95358

Project Location: Fink Road Landfill, 4000 Fink Road, Crows Landing, CA 95313

Project Location – County: Stanislaus

APN: 027-017-040

Description of Project: Expansion of the landfill's existing gas collection and control system (GCCS) into Landfill Unit #2, the active portion of the landfill where normal refuse is landfilled. The Central Valley Regional Water Quality Control Board (CVRWQCB) is requiring the submittal of a GCCS System Installation and System Start-up Report by August 30, 2019. To meet this deadline, the GCCS system improvements must be constructed and operational by or before July 2019. The work consists of the installation of 33 vertical gas wells, (approximately 2,000 feet of vertical drilling), 14 horizontal gas collectors (approximately 3,800 linear feet), and the installation of four (4) pneumatic pumps/sumps and air/condensate discharge lines to be tied into the existing flare station piping. In addition, the work will involve connecting lateral piping and installing header lines (approximately 3,500 linear feet), to be tied into the existing main header near the landfill gas flare station, as well as a replacement air compressor in the flare station to handle the additional pneumatic load. These new wells and horizontal collectors will be networked to the existing GCCS on Landfill Unit #1; the closed portion of the landfill.

Name of Agency Approving Project: Stanislaus County Department of Environmental Resources

Lead Agency Contact Person: Janis Mein

Telephone: (209) 525-6792

Exempt Status: (check one)

- Ministerial (Section 21080(b)(1); 15268);
- Declared Emergency (Section 21080(b)(3); 15269(a));
- Emergency Project (Section 21080(b)(4); 15269(b)(c));
- Categorical Exemption. State type and section number: CCR Title 14, Chapter 3, Article 19, Section 15308
- Statutory Exemptions. State code number: _____
- General Exemption.

Reasons why the project is exempt: The GCCS expansion meets the Categorical Exemption criteria under Section 15308, of Title 14 of the California Code of Regulations, Article 19: Categorical Exemptions, which states, "Class 8 consists of actions taken by regulatory agencies, as authorized by State or local ordinance, to assure the maintenance, restoration, enhancement, or protection of the environment." The County is engaging in this expansion under the direction of the CVRWQCB, a state regulatory agency, and is authorized by the Public Resources Code Section 21000, et seq., to ensure protection of the environment. In addition, the CVRWQCB is authorized by Title 27 of the California Code of Regulations to ensure the protection of the environment.

[Signature]
Signature

Assistant Director
Title
Date removed from posting 5/14/19

4/5/19
Date

Central Valley Regional Water Quality Control Board

7 June 2018

Jami Aggers, Director
Stanislaus County Department of Environmental Resources
3800 Cornucopia Way, Suite C
Modesto, CA 95358



CONDITIONAL APPROVAL OF EXTENSION REQUEST, FINK ROAD LANDFILL, STANISLAUS COUNTY

The Fink Road Landfill is owned and operated by Stanislaus County (hereafter Discharger), and regulated by Waste Discharge Requirements (WDRs) Order R5-2008-0144. The facility is located about 3.5 miles west of Crows Landing, just west of Interstate 5, and consists of one closed and four operating waste management units (WMU); a closed unlined Class III WMU (LF-1), an operating lined Class III WMU (LF-2), an operating lined Class II WMU (LF-3), and two operating Class II surface impoundments (SI-1 and SI-2).

Background

In the 2 May 2018 letter, Water Board staff conditionally approved the Discharger's LF-2 landfill gas (LFG) corrective action collection and control system, as proposed by the Discharger in the 30 November 2016 *Impact Assessment ... and Engineering Feasibility Study*, the 2 October 2017 *Gas Collection and Control Improvements Plan*, and the 2 March 2018 *Landfill No. 2 (LF-2) Landfill Gas and Flare System Assessment Report*. Using the schedule proposed by the Discharger in their 2 March 2018 report, Water Board staff directed the Discharger to submit a system installation report by 31 December 2018, and a system start-up by 29 March 2019.

Extension Request

On 22 May 2018, the Discharger called Water Board staff to discuss the installation of the proposed LF-2 Corrective Action System, and as a follow-up to this phone call, they submitted the 4 June 2018 *Request for Time Extension (Extension Request)*. The *Extension Request* states that the Discharger expects to receive a system installation report from their consultant by 31 July 2019, and that they will submit a final system installation report to Water Board staff by 30 August 2019. The Discharger also states that they will submit a separate system startup report by 30 November 2019.

On 4 June 2018, Water Board staff called the Discharger to discuss the *Extension Request* and confirm their intent regarding the operation of the proposed LF-2 Corrective Action System. The Discharger stated that they intend to begin operating the proposed LF-2 Corrective Action System once installed. Therefore, the installation report they propose to submit to Water Board staff by 30 August 2019, 30-days after system installation is complete, will also be able to document the startup and continued operation of the LF-2 Corrective Action System.

KARL E. LONGLEY ScD, P.E., CHAIR | PATRICK PULUPA, EXECUTIVE OFFICER

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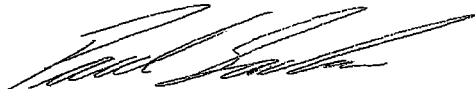
Conditional Approval

Based on the Discharger's assurance that the LF-2 Corrective Action System installation report, to be submitted by **30 August 2019**, will document the start-up and continued operation of the LF-2 Corrective Action System, Water Board staff conditionally approves the Discharger's 4 June 2018 *Extension Request*. Subsequently, Stanislaus County shall:

- 1 Continue submitting **Quarterly Progress Reports** as requested in the 2 May 2018 Water Board staff letter. The next Quarterly Progress Report, documenting work completed to date through the Second Quarter 2018, shall be submitted by **31 July 2018**.
- 2 Submit by **30 August 2019**, a **LF-2 LFG Extraction System Installation and Start-up Report**. This report shall document the installation of the approved LF-2 corrective action collection and control system, including all proposed LFG extraction wells, horizontal collectors, and all associated connections and piping necessary to plumb each extraction point to the LF-1 header line. The report must also document the start-up and continued operation of the LF-2 Corrective Action System. All subsequent LFG corrective action system reporting, for both LF-1 and LF-2, shall be incorporated into the site's semi-annual monitoring reports.

All required data and reports must be uploaded to GeoTracker and you must notify us by e-mail at centralvalleysacramento@waterboards.ca.gov after uploading each report. To ensure that each GeoTracker upload notification is routed to the appropriate staff, please include the following information in the body of the email: Staff Name, Compliance Unit, Title 27, the date and title of the report uploaded, the GeoTracker upload confirmation number for the report uploaded, and the facility's CIWQS place ID (CW-224472).

If you have any questions regarding this letter or the site in general, please contact me at 916-464-4817 or via e-mail at paul.sanders@waterboards.ca.gov.



PAUL SANDERS, P.G. #7775
Engineering Geologist
WDR Compliance and Enforcement Unit

cc: Michael Payan, CalRecycle, Sacramento
Gabe Avila, Stanislaus County Department of Environmental Resources, Modesto
Janis Mein, Stanislaus County Department of Environmental Resources, Modesto
Craig Cissell, Stanislaus County Department of Environmental Resources, Modesto
Wayne Pearce, SCS Engineers, Sacramento

Central Valley Regional Water Quality Control Board

RECEIVED

2 May 2018

MAY 4 2018

Jami Aggers, Director
Stanislaus County Department of Environmental Resources
3800 Cornucopia Way, Suite C
Modesto, CA 95358

STANISLAUS COUNTY
ENVIRONMENTAL RESOURCES

**REVIEW AND APPROVAL OF TECHNICAL REPORTS AND WORK REQUEST, FINK ROAD
LANDFILL, STANISLAUS COUNTY**

The Fink Road Landfill is owned and operated by Stanislaus County (hereafter Discharger), and regulated by Waste Discharge Requirements (WDRs) Order R5-2008-0144. The facility is located about 3.5 miles west of Crows Landing, just west of Interstate 5, and consists of one closed and four operating waste management units (WMU); a closed unlined Class III WMU (LF-1), an operating lined Class III WMU (LF-2), an operating lined Class II WMU (LF-3), and two operating Class II surface impoundments (SI-1 and SI-2).

Water Board staff reviewed two reports submitted by the Discharger. Outlined below is a brief summary/discussion regarding each report, proposed site work, and a request for additional site work necessary to achieve and maintain compliance with the WDRs and Title 27.

Reviewed Reports

- 2 March 2018 - *Landfill No. 2 (LF-2) Landfill Gas and Flare System Assessment Report*
- 30 March 2018 - *Storm Water Retention Basin Soil Remediation Plan*

Report Summaries

- 2 March 2018 - *Landfill No. 2 (LF-2) Landfill Gas and Flare System Assessment Report (Assessment Report)*

In 2015 and 2016, investigations were conducted to determine the source of volatile organic compound (VOC) detections in monitoring well MW-26, located directly downgradient of LF-2. The results indicated that the VOCs detected in well MW-26 were likely due to landfill gas (LFG) and not the result of a liquid phase release. Subsequently, in the 30 November 2016 *Impact Assessment ... and Engineering Feasibility Study (Feasibility Study)*, the Discharger concluded that the most effective remedial strategy to address the VOC impacts was enhanced LFG capture. To formalize their corrective action proposal, the Discharger submitted the 2 October 2017 - *Gas Collection and Control Improvements Plan 2017*, which contained design drawings and specifications for the installation of a LFG collection and control system in LF-2. The proposed LF-2 LFG collection and control system will include 33 vertical

extraction wells, 14 horizontal collectors, and all piping necessary to plumb each LF-2 extraction point to the existing LF-1 LFG header line.

The March 2018 *Assessment Report* provides additional clarification regarding the proposed LF-2 LFG collection and control system, includes expected radius of influence (ROI) calculations, and recommends that the capacity of the flare be increased from 2,400 to 3,000 scfm by the end of 2021. The *Assessment Report* also contains a schedule for the installation and operation of the proposed LF-2 LFG collection and control system.

Water Board Staff Response

The proposed LF-2 LFG corrective action collection and control system, as originally proposed in the November 2016 - *Feasibility Study* and as outlined in the October 2017 - *Gas Collection and Control Improvements Plan 2017*, is approved.

- 30 March 2018 - *Storm Water Retention Basin Soil Remediation Plan (Work Plan)*

On 11 April 2017, Water Board staff observed evidence that contact storm water (leachate) had flowed out from the active face of LF-2 and into to the LF-2, Cell-5 storm water retention basin. VOCs were detected in a surface water sample collected from the basin on 13 April 2017, and soil samples collected from the basin on 4 October 2017 confirmed impacts to soil within the basin. To address this release, the *Work Plan* contains a proposal to remove soil in 1 to 2 foot lifts, and to collect confirmation soil samples from the base of the excavation after each lift is removed. Each soil samples will be analyzed for chloride, sodium, potassium, and sulfate, and the results will be compared to Upper Tolerance Levels (UTLs) calculated from a background data set. The calculated clean-up level UTLs for chloride, sulfate, sodium, and potassium are 38.0 mg/kg, 43.2 mg/kg, 151 mg/kg, 1,674 mg/kg respectively. If all soil samples collected after the initial excavation are below these UTLs, no further excavation will be conducted. However, if any of the parameters are above the UTLs, additional excavation will be conducted. Soils excavated from the basin will be transported and disposed in LF-3.

Water Board Staff Response

The LF-2, Cell-5 storm water basin remedial excavation, as proposed in the March 2018 *Work Plan*, is approved.

Required Work

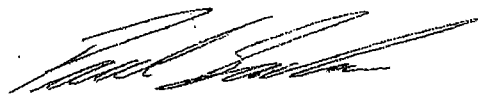
Stanislaus County shall:

- 1 Submit a report by **14 September 2018**, that documents the completion of the LF-2, Cell-5 storm water retention basin clean-up effort, as proposed in the March 2018 *Work Plan*. In addition to the analytical results of all collected samples, the amount and fate of all excavated soil must also be documented in the report.

- 2 Continue submitting **Quarterly Progress Reports** as originally requested in the 8 August 2017 Water Board staff letter. The next Quarterly Progress Report, documenting work completed to date through the Second Quarter 2018, shall be submitted by **31 July 2018**. Each Quarterly Progress Report shall provide an update regarding the Discharger's proposal to:
 - a. Re-distribute available vacuum from the LF-1 LFG extraction system to the LF-2 leachate raisers. This update shall include monthly sampling results and flow readings.
 - b. Install and operate the proposed LF-2 LFG corrective action collection and control system.
 - c. To excavate and construct Cell-6 in LF-2.
- 3 Submit a **LFG Extraction System Installation Report** by **31 December 2018**, that documents the installation of the proposed LF-2 LFG corrective action collection and control system. This report shall document the installation of each proposed LFG extraction well, each proposed horizontal collector, and all associated connections and piping necessary to plumb each extraction point to the LF-1 header line.
- 4 Submit a **LFG Extraction System Start-up Report** by **29 March 2019**, that documents the initial startup, testing, tuning, and continued operation of the proposed LF-2 LFG corrective action collection and control system.

All required data and reports must be uploaded to GeoTracker and you must notify us by e-mail at centralvalleysacramento@waterboards.ca.gov after uploading each report. To ensure that each GeoTracker upload notification is routed to the appropriate staff, please include the following information in the body of the email: Staff Name, Compliance Unit, Title 27, the date and title of the report uploaded, the GeoTracker upload confirmation number for the report uploaded, and the facility's CIWQS place ID (CW-224472).

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