



CITY OF SACRAMENTO

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DEPARTMENT OF PUBLIC WORKS
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M. H. JOHNSON
Director

January 23, 1985

Transportation & Community
Development Committee
Sacramento, California

SUBJECT: Recent California Waste Management Board Action
Concerning Landfill

SUMMARY:

This report describes recent actions of the California Waste Management Board and summarizes landfill inspection by the City, County, and State over a period of two years.

DISCUSSION:

1. Waste Management Board Action

One local newspaper reported that the City had been ordered to "clean up the landfill" or "face having it shut down". This report was in error and the newspaper printed a correction the next day. Actually the California Waste Management Board passed a resolution authorizing the Chief Executive Officer to de-designate the City Planning Department as the Local Enforcement Agency (LEA) under certain conditions after thirty days.

Currently, there are two LEA's for landfills within the city limits. The County Health Department inspects for health-related matters and the City Planning Department inspects for operational related matters. The State staff appears to be of the opinion that the Solid Waste Division does not respond rapidly enough in correcting deficiencies in operations noted by the City inspector. Apparently, the State staff feels that deficiencies are corrected in a more timely manner when noted by the County Inspector. In some cases the State staff felt that a 24-hour notice to correct deficiencies should have been issued by the City inspector. Neither the City or County inspector issued such an order.

The State staff has said that none of the deficiencies were an immediate health threat to nearby residents. While it is not necessarily agreed that there has been any disparity in

response, it had previously been recognized that having two LEA's for the City landfill is not good. Consequently, the City has initiated action to designate the County Health Department as the sole LEA. This will require approval of the County Board of Supervisors, the City Council and the Waste Management Board. Action by the Board and Council action can be completed within the next four weeks and will preclude any de-designation by the Chief Executive Officer of the Waste Management Board.

2. Landfill Inspections

Attached is a chronological listing of inspections by both the City and County for the past two years (Exhibit I). There are various "violations" or deficiencies noted during these inspections; however, in no case are there serious health problems. The deficiencies can generally be grouped into three categories - litter, inadequate cover and ponded water.

a. Litter

The presence of litter, particularly on-site, has been a continuing problem for the past two years. This problem was recently exacerbated by a heavy wind storm which blew over several trees during the end of November. The main reason for this deficiency has been lack of adequate personnel to pick up the litter. An attempt had been made to use General Assistance recipients to perform this function. This solution proved to be unsatisfactory and City staff erred in its reluctance to change the program. Consequently, four full-time employees were hired on December 31, 1984 to pick up litter. With these employees it will no longer take as long to retrieve all of the litter as it did after the November 30, 1984 wind storm.

b. Inadequate Cover

Inadequate cover does not mean that there are piles of uncovered garbage on the ground surface. Generally, it means that there is material "daylighting" through the cover. This material is frequently plastic bags. On one occasion, (11/25/83) the City was noticed for improper cover of a ruptured infectious waste bag.

Our landfill equipment operators are experienced operators but lack adequate training in landfill cover operations. Therefore, a consulting firm was retained to train the operators and develop an operations plan. The employee assigned by the consultant to this project was a former employee of the Waste Management Board and

had at one time been responsible for operating six landfills. Once this employee began working with the operators, the inadequate cover or "daylighting" problem was brought under control. The consultant's employee has recently agreed to join the City staff and began City service on January 15, 1984. The equipment operators as well as the litter collection employees will work directly under this individual's supervision. This should alleviate problems associated with improper cover.

c. Ponded Water

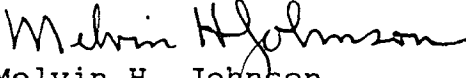
This discrepancy was noted in January 1983 and did not appear again until December 1984 after heavy rain storms. The City did not respond rapidly enough in adequately pumping this water. However, the long-term solution to this problem is a better grading plan for the landfill. The operations plan developed by the consultant noted above includes a new grading plan.

3. State Inspections

State inspectors normally monitor the Local Enforcement Agencies and do not fill out notices of inspection. However, there were four which were completed by the State inspector during December 1984 and January 1985. These notices are summarized in Exhibit II. These reports generally reiterate the City's slow response to the aftermath of the storms in late November 1984 and early December 1984. Also attached, Exhibit III, is a letter from the State Waste Management Board to the City Planning Department concerning the LEA activity.

While we have experienced operational problems in the past, the staff has taken corrective actions which will result in landfill operations that meet all requirements.

Respectfully submitted,


Melvin H. Johnson
Director of Public Works

For Committee Information:

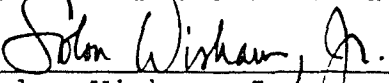

Solon Wisham, Jr.
Assistant City Manager

Exhibit I

Chronological Listing of Landfill Notices
of Inspection for 1983-84

<u>Date</u>	<u>LEA*</u>	<u>Comments Noted by Inspector</u>
1/13/83	County Planning	1) Covered surfaces are graded in a manner that promotes ponding. 2) Observed daylighting on intermediate slopes. 3) Excessive amount of litter was observed on the perimeter of the landfill.
1/21/83	City Planning	Standing water
2/14/83	County Health	1) Poor compaction at bottom of slopes. 2) Excessive litter - "The crews from the County's Welfare program were making a minimum attempt to pick the litter up."
2/16/83	City Planning	No violations
3/29/83	County Health	1) Omission of 12 inches of intermediate cover. 2) Insufficient cover material available.
4/ 1/83	City Planning	No violations
4/25/83	County Health	1) Accumulation of litter and trash along fence. 2) "Daylighting" through intermediate cover.
5/ 6/83	City Planning	No violation
5/20/83	County Health	Final cover not 24 inches in depth.
6/10/83	City Planning	Some litter material around truck cleaning station - "litter pick-up crew working at site during time of inspection".
6/24/83	County Health	Insufficient cover material.
8/ 1/83	County Health	1) Excessive litter at front entrance. 2) Insufficient intermediate cover.

*Local Enforcement Agency

<u>Date</u>	<u>LEA</u>	<u>Comments Noted by Inspector</u>
5/83	City Planning	No violations
9/30/83	City Planning	No violations
9/30/83	County Health	Excessive daylighting through intermediate cover. "This has been a frequent problem!"
10/31/83	County Health	1)Observed garbage filled dumpsters in corporation yard. 2)Intermediate cover inadequate.
11/ 4/83	City Planning	No violations
11/25/83	County Health	1)Wastes not adequately compacted - slope too steep. 2)All slopes not receiving daily cover. 3)Exposed infectious wastes.
2/14/84	County Health	1)Excessive litter at front entrance. 2)Garbage filled broken dumpsters collecting water and presenting a nuisance problem.
3/26/84	County Health	1)Excessive daylighting. 2)Adequate cover not being provided. 3)Excessive litter. 4)Garbage in broken dumpsters.
4/30/84	County Health	1)Dumpsters in yard filled with garbage. 2)Excessive daylighting. 3)Litter control inadequate.
5/10/84	City Planning	Litter along fences.
5/24/84	County Health	No violations
7/13/84	City Planning	No violations
8/16/84	City Planning	No violations
9/ 4/84	County Health	1)Inadequate cover. 2)Litter along east fence.
9/17/84	County Health	No violations
9/17/84	City Planning	No violations
10/12/84	City Planning	1)Litter on truck pad. 2)Waste/litter around scale house. 3)Daylighting of waste.
10/19/84	City Planning	1)Tree trunks stored next to "egg area". 2)Litter around "egg area".

<u>Date</u>	<u>LEA</u>	<u>Comments Noted by Inspector</u>
10/26/84	City Planning	1) Litter in front of "egg area" - Inspector also noted that tree trunks had been disposed of, litter collected at east end of site and that landfill had adequate cover at end of day.
11/ 2/84	City Planning	1) Tree trunks near "egg area". 2) Litter in plastic bags blowing in the wind at east end. 3) Litter in front of "egg area".
11/ 2/84		No violations - Inspector noted that daily cover was okay.
11/ 9/84	County Health	Litter fences facing wrong direction - litter blowing toward river. The Inspector also noted that the daily cover appeared adequate.
11/16/84	City Planning	No violations
11/16/84	County Health	Minor exposure of refuse on sides of daily slope.
11/21/84	City Planning	No violations
12/30/84	County Health	1) Daily cover absent on approximately 300 square feet of area. 2) Exposed refuse in water ponded at toe of slope. 3) Water ponded on intermediate slope. 4) Litter in trees and on ground along river.
12/ 3/84	City Planning	Litter blown in American River Parkway. The inspector also noted that the daily cover appeared adequate.
12/ 6/84	City Planning	1) Litter blown in American River Parkway. 2) Some standing water.
12/12/84	City Planning	The Inspector noted that there were no major violations and that prior off-site litter had been corrected. Some minor litter was observed in the American River; however, it was not deemed significant. Water pump was observed to be reducing standing water.
12/18/84	City Planning	The Inspector noted that there were no major violations. Some minor litter was observed in the American River Parkway. Water pumps removing ponded water. Minor ponding noticed at active force.

<u>Date</u>	<u>LEA</u>	<u>Comments Noted by Inspector</u>
12/18/84	County Health	1)Minor litter remaining in tree north of landfill. 2)Water ponding on intermediate slope - same amount is noted on 12/13/84.
1/ 4/85	County Health	No deficiencies on site.
1/10/85	City Planning	Minor ponding observed. Rainfall occurred on 1-9-85. Water pumps observed in operation. Minor ponding scattered over old landfill areas; no significant ponding noted at active force.
1/11/85	County Health	No health deficiencies on site.

Exhibit II

State Inspection Reports

<u>Date</u>	<u>Comments Noted by Inspector</u>
12/7/84	<ol style="list-style-type: none">1)Substantial ponding after four days of dry weather.2)Daylighting and one area needing cover.3)Substantial amounts of litter along fence area - thick.4)Substantial amounts of litter off-site - both on landfill site of parkway and other side of river, in trees and water. Need to have a litter control program immediately.
12/12/84	<ol style="list-style-type: none">1)Exposed refuse where ditch was dug.2)Litter in American River Parkway and in river.3)Excessive ponding.
12/18/84	<ol style="list-style-type: none">1)Ponding has been decreasing because of pumping - continue to do pumping.2)Litter still across river in parkway and in river next to the shore - an improvement.3)Cover being applied during inspection, looks as though it will be adequate.
1/ 8/85	<ol style="list-style-type: none">1)Litter is still on opposite side of river from landfill.2)Ponding is slight.3)Cover is adequate.

CALIFORNIA WASTE MANAGEMENT BOARD



1020 NINTH STREET, SUITE 300
SACRAMENTO, CALIFORNIA 95814

DEC 18 1984

DEC 19 REC'D

Marty Van Duyn, Director
City of Sacramento Planning Department
927 10th Street, 3rd Floor
Sacramento, CA 95814

Subject: Sacramento City Landfill

Dear Mr. Van Duyn:

The California Waste Management Board at its September 21, 1984 meeting concurred with the issuance of the solid waste facility permit for Sacramento City Landfill. The following stipulations condition that permit:

1. Upon issuance of this permit, the Local Enforcement Agency will perform weekly inspections, or more frequent inspections if warranted, of the facility to assure continued compliance with the State Minimum Standards.
2. That the Board staff will monitor the inspection reports submitted by the Local Enforcement Agency for 120 days to ascertain the site's continual compliance.
3. That the Local Enforcement Agency and the Board staff will review the facility's compliance record for consideration by the Board at its January 1985 meeting.

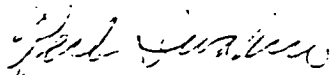
In addition, the permit includes a provision stating that if the facility is found violating State Minimum Standards, including sections relating to litter, cover, infectious wastes, and slopes, your Department will inform the operator that compliance shall be attained within 24 hours. Your department began its weekly inspections on October 12, 1984. Since that time, there have been a total of 8 inspections. On two inspections, no violations were noted. However, cover and/or litter violations were reported on six separate inspections.

Board staff reviewed your files on December 12, 1984 and found no record of correspondence between your Department and the City Landfill to indicate that a 24 hour notice had been given. Nor is there a record of follow-up inspections within 24 hours of the recorded violations. The permit further specifies that if a 24 hour notice had been issued and violations were not corrected within that time, a Notice and Order would be issued to suspend the receipt of wastes. The records indicate that this has not occurred.

Please take immediate action to rectify the deficiencies referenced above. Because of the noted permit conditions and the sensitive nature of the landfill, it is imperative that your Department's actions are appropriate to assure the landfill is operating within standards at all times.

If you have any questions regarding this matter, please call me at 322-3330.

Sincerely,



Herb Iwahiro
Deputy Executive Officer

cc: Melvin Johnson
Public Works Director

Art Seipel
Sacramento County Health Department