



Linda S. Adams  
Secretary for  
Environmental Protection



## Department of Toxic Substances Control

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8800 Cal Center Drive  
Sacramento, California 95826-3200



Arnold Schwarzenegger  
Governor

### NOTICE OF EXEMPTION

To: Office of Planning and Research  
State Clearinghouse  
P.O. Box 3044, 1400 Tenth Street,  
Room 212  
Sacramento, CA 95812-3044

From: Department of Toxic Substances Control  
Permit Renewal Team  
8800 Cal Center Drive  
Sacramento, CA 95826

Project Title: Hazardous Waste Management Facility, West County Landfill,  
Post-Closure Permit (Permit)

Project Location: At the foot of Parr Boulevard, Richmond or about 12 miles northwest of San Francisco

County: Contra Costa County

Project Description: The project consists of the issuance of a post-closure permit for the closed hazardous waste Facility at the West County Landfill (WCL). This post-closure permit was issued to replace a previous post-closure permit signed on July 9, 2003.

The Facility stopped receiving hazardous waste in 1985 and the facility was certified closed by the Department of Toxic Substances Control (DTSC) with waste remaining in place in compliance with the Closure Plan. The Closure Plan required the items listed below to be implemented in order to properly close the facility. With closure certification, state and federal regulations require that a post-closure plan for a 30-year period be developed and implemented by the facility. The post-closure permit outlines the procedures to fulfill these regulatory requirements, which consist of three primary functions: (1) continued maintenance of closure structures, (2) continued environmental monitoring, and (3) continued maintenance of financial mechanisms to fund the post-closure activities. The specific post-closure activities required to be implemented with the issuances of the post-closure permit are the following:

- Monitor the groundwater for water quality and gradients,
- Manage leachate by extracting, treating and discharging it to the West County Wastewater District (WCWD) Wastewater Treatment Plant,
- Monitoring the slurry wall surrounding the facility, and
- Inspecting, maintaining and repairing the structures at the facility, which include the closed landfill and the leachate treatment system

### Background

The Facility covers about 28-acres located in Richmond, California and includes the following units:

- A capped, closed Class I Hazardous Waste Landfill identified as the Hazardous Waste Management Facility (HWMF),
- A Leachate Treatment System (LTS) located south of the HWMF,
- A Corrective Action Management Unit (CAMU) which receives solid hazardous waste generated from the LTS process,

- An area undergoing corrective action monitoring known as the E-22R area located east of the HWMF.

The Facility is surrounded by the Class II portion of the West Contra Costa County Sanitary Landfill. The land use in the Richmond area is primarily used for industrial purposes. The WCWD Wastewater Treatment Plant is located southeast of the HWMF, the Richmond Sanitary Service Corporation Yard is to the east, and San Pablo Creek is within 100 feet of E-22R area to the east and northeast. Initial wastes received included demolition debris, municipal solid waste, and industrial waste. In later years, the site was designated to receive hazardous waste. In accordance with state and federal regulations, closure of the facility was initiated once receipt of hazardous waste ceased. A closure certification report was submitted by the facility and approved by DTSC. DTSC found the document in compliance with the California Code of Regulations, title 22, and the approved Closure Plan. With the approval of this document, the facility was certified closed. At this time, post-closure oversight and maintenance responsibilities for the owners of the Facility began.

### **Groundwater, Vadose Zone, and Air**

The post-closure permit approved by DTSC in July 9, 2003 required the following activities:

- Monitoring groundwater elevation and water quality at the facility,
- Managing leachate by extracting, treating and discharging it to the WCWD Wastewater Treatment Plant in order to do the following
  - (1) obtain an inward gradient between the groundwater outside of the slurry wall and the leachate inside of the slurry wall and
  - (2) eventually removing the leachate,
- Managing landfill gas by collecting, treating and venting,
- Monitoring the slurry wall surrounding the facility, and
- Inspecting, maintaining and repairing the structures at the facility.

Two water bearing zones have been identified beneath the facility, an upper and lower water-bearing zone. The facility has been in post-closure Detection and Corrective Action Monitoring since December 1991. The upper and lower water bearing zones are both monitored under the Corrective Action Monitoring Program, and the Detection Monitoring Program. The groundwater monitoring network includes about 45 monitoring, point of compliance, and background wells. Another five data gathering points exist to monitor impoundment liquid levels, liquid collection recovery, and dewatering.

### **Project Activities**

To renew the West Count Landfill Post-Closure Permit the following tasks were required:

- The Facility prepared a Final Post-Closure Permit Application (Application)
- DTSC reviewed the Application and required changes as part of Notice of Deficiencies
- DTSC prepared a Draft Post-Closure Permit
- The Draft Permit received a 45-day public comment period
- Permit approval

The Post-Closure Permit includes three main requirements:

1. Regular inspection and maintenance of the cover and drainage systems (with corrective action as necessary);
2. Environmental monitoring, consisting of regular monitoring well inspection, sampling, and data analysis; and,
3. Provisions of financial mechanisms to fund the post-closure activities for 30 years.

Name of Public Agency Approving Project: Department of Toxic Substances Control (DTSC)

Name of Person or Agency Carrying Out Project: West County Landfill

Exemption Status: (check one)

- Ministerial [PRC, Sec. 21080(b)(1); CCR, Sec. 15268]
- Declared Emergency [PRC, Sec. 21080(b)(3); CCR, Sec.15269(a)]
- Emergency Project [PRC, Sec. 21080(b)(4); CCR, Sec.15269(b)(c)]
- Categorical Exemption: [State type and section number]
- Statutory Exemptions: [State code section number]
- General Rule [CCR, Sec. 15061(b)(3)]

Exemption Title: Title 14, California Code of Regulations, Section 15061 (b)(3).  
With certainty, no possibility of significant environmental effect.

Reasons Why Project is Exempt: This project consists of replacing the Facility's Post-Closure Permit. With the exception of periodic cover inspections, groundwater monitoring, minor repairs of cover for drainage, and rebuilding the leachate treatment system, no physical changes to the site are proposed. Control measures that will limit environmental effects to insignificant levels include the following:

- An EIR was prepared and certified in support of the Closure and Post-Closure Plans which are the basis of this Permit.
- The Closure Certification Report as approved by an independent registered engineer certified that the WCCSL HWMF was built according to the approved plans and is in good working order. These units include; (1) the landfill subgrade, (2) the landfill cover, (3) the drainage trenches, and (4) the final site topography.
- The Closure Certification Report as approved by an independent registered engineer certified that the leachate collection, removal and treatment system was built according to the approved plans and is in good working order. This system consists of collection pipes, sumps, pumps and riser pipes, pumping systems, and the leachate treatment system. In addition, the cover has a gas collection system with the following features: gas collection pipes, riser pipes and gas carbon filter assemblies.
- For the purposes of groundwater monitoring, the DTSC Geological Services Unit has updated and approved the Corrective Action Groundwater Monitoring Sampling and Analysis Plan (SAP) to adequately monitor the site hydrogeology. Major features of the SAP include: a list of Constituents of Concern, Concentration Limits, Monitoring Points, and a Reporting Program.
- There is a corrective action groundwater control system at the facility designed to create an inward gradient of the groundwater level within the slurry wall surrounding the closed facility. This is achieved by the extraction of groundwater from the area within the slurry walls for treatment and *offsite* discharge to the POTW. The groundwater control system will continue to operate until such time that DTSC has determined that corrective action *is* no longer necessary.
- Future land use of the Facility is restricted as detailed in a Covenant to Restrict Use of the Property recorded March 4, 2004. Deed restrictions are also in place that limit future use of the property and provide notice of its former hazardous waste landfill uses.
- Post-Closure activities are carefully regulated to assure against the potential for any additional environmental concerns. Pursuant to DTSC authority, any new discoveries at the Facility will trigger an examination and evaluation of this notice of exemption (NOE) relative to the statutory and regulatory requirements of the California Environmental Quality Act (CEQA). Any constituent release will trigger corrective action mechanisms such a Corrective Action Consent Agreement or Unilateral Correction Action Order, as well as evaluation of this NOE for CEQA compliance.

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<u>Project Manager Name</u>	<u>Project Manager Title</u>	<u>Phone #</u>

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<u>Permit Renewal Team Leader</u>		<u>Phone #</u>

TO BE COMPLETED BY OPR ONLY

Date Received For Filing and Posting at OPR:

DRAFT