



Placer County
Health and Human Services Department

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January 27, 2010

Greg Stanton
Deputy Director
El Dorado County
Environmental Management Department
2850 Fairlane Court
Placerville, California 95667

Perspective, Hope, and Opportunity

Dear Mr. Stanton,

This office is in receipt of your correspondence (e-mail Stanton to Estolas, 1/13/10) regarding the Union Mine LFG Monitoring and Reporting. As indicated on your e-mail, it states;

"I am trying to determine if the work (LFG well head, surface monitoring and reporting) currently performed by an outside consultant, Field Solutions, Inc., can be performed by EMD staff. From your perspective and that of CIWMB, are you aware of any statutory requirements that would prevent EMD from performing this work on our own landfill? Are you aware of any licensing requirements (PE, REA, RG, etc) of the individuals or firms that perform this work?

In reviewing the March 2006 Final Closure Plan submitted to the LEA page 8-14 states; "The landfill gas monitoring program is conducted by a qualified **third party environmental monitor**, and that is independent of both the landfill owner and operator. The landfill emissions from the landfill surface, landfill gas probes, and on-site structures are monitored to determine if landfill gas is present in concentrations above the allowable limits and to detect any possible migration of landfill gas.

Title 27 of the California Code of Regulation section 21830 (a) states, " The purpose of the final postclosure maintenance plan is to provide a basis for the operator to establish an accurate detailed cost estimate certified for accuracy by a registered civil engineering or certified engineer geologist, enable the CIWMB to assess the reasonableness of the cost estimate, and provide a detailed plan for the inspection, maintenance, and monitoring of the landfill during the postclosure maintenance period".

Title 27 section 21840 (a) which refers to Postclosure Maintenance cost estimates states, "The operator shall provide a written estimate, in current dollars, of the cost of hiring a **third party** to maintain, monitor, and inspect the closed landfill in accordance with the postclosure maintenance plan requirements".

Title 27 section 21890 (a) which refers to Revision of Approved Plans for Closure and Postclosure Maintenance states, "The operator shall adhere to the final closure and postclosure maintenance plans approved pursuant to Section 21860. Significant changes to the closure and

postclosure maintenance plans, after approval of the final plan, shall upon concurrence with the EA be approved by the CIWMB, and the RWQCB".

Should you wish to amend your Postclosure Maintenance Plan/Final Closure then Title 27 section 21830, shall be followed accordingly and an amendment must be made to the document.

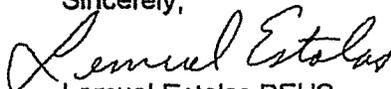
The LEA has determined that this proposed monitoring would be a conflict of interest. The Final Closure Plan which has been approved by CIWMB would be changed because the third party environmental monitor will not continue performing the LFG Monitoring and Reporting at Union Mine Landfill as indicated on the Final Closure Plan submitted to and approved by the LEA and CIWMB dated March 2006.

Pursuant to CCR 27 El Dorado County Environmental Management must submit an amendment to the approved Final Closure Plan dated March 2006. This plan shall include:

- availability of quality assurance and compliance protocol
- a sign off on all monitoring reports that involves a civil engineer oversight.
- the personnel calibrating the equipment
- identification of the person using the instrument
- identification of the instrument performing the test.
- a complete procedure on how the LFG Monitoring is done.
- frequency of LFG Monitoring
- quarterly reports shall be stamped by a Civil Engineer
- all quarterly reports shall be submitted to the LEA and CIWMB

If you have any question please contact me at (530) 745-2314

Sincerely,


Lemuel Estolas REHS

Cc: Nevin Yates, CIWMB
Mike Wochnick, CIWMB
Gino Yeatka, CIWMB
Virginia Lineberry, Supervisor, Haz/Mat, Solid Waste
John Moody, RWQCB