



Department of
Resources Recycling and Recovery

Jared Blumenfeld
Secretary for
Environmental Protection

Scott Smithline
CalRecycle Director

August 30, 2019

David Carmany, City Manager
City of West Covina
1444 W Garvey Ave S, Room 305
West Covina, California 91790

**BKK LANDFILL, CITY OF WEST COVINA, LOS ANGELES COUNTY (19-AF-0001)
PERIMETER GAS MONITORING NETWORK GAS ORIGIN STUDY REPORT**

Dear Mr. Carmany:

Preliminary Note: The Department of Resources Recycling and Recovery (CalRecycle) intended to submit this letter to the City of West Covina Solid Waste Local Enforcement Agency (LEA). However, since the City is presently revising its organizational chart and the LEA contact person is unclear, we are directing this letter to you.

As a follow up to the landfill gas compliance monitoring probe video bore investigation conducted on March 22 and 23, 2017, at the request of the LEA, CalRecycle's Engineering Support Branch (ESB) Closure and Technical Support Section (Closure) staff conducted landfill gas sample collection on April 26 and 27, 2017. This data has been harmonized with other sampling results over the last couple of years, which has now led us to revise our former guidance regarding methane origins at the facility.

Based on the results of the analyses, ESB staff determined that the predominant portion of the gas encountered in the Class III portion of the landfill gas monitoring network is from landfill waste decomposition process and originates from the landfill. Please refer to the attached "Staff Report - Landfill Gas Sampling and Laboratory Analysis Class III Landfill Gas Compliance Wells," dated July 2019 (The Report), regarding details of sample collection, analyses, and results interpretation.

As the result of this determination (which is based upon additional information not available previously), CalRecycle can no longer concur with the operator's claim regarding a predominant presence of petrogenic and non-landfill related methane located in the Class III northwest perimeter monitoring probes, which had resulted in these probes not being subjected to Title 27, California Code of Regulations (27 CCR) Section 20921 compliance requirements (i.e., when the concentrations measured exceed the regulatory limits). (See CalRecycle letters to BKK dated July 28, 2000 and October 12, 2012).

To the contrary, the Report establishes that based upon the age and organics constituency of the sampled gas located on the northwest perimeter of the landfill, the majority of methane found can be traced directly to the waste decomposition process and not to naturally occurring gas deposits. (See Report, Appendix F and Figure 5 thereto¹). Thus, CalRecycle's ESB Closure Staff hereby revises its prior guidance to the LEA on this issue and determines that the probes in the northwestern areas of the Class III landfill are subject to Title 27, California Code of Regulations (27 CCR) Section 20921 et seq. compliance requirements.

Please note that CalRecycle will be further addressing the resolution of the inadequacies of the current landfill gas monitoring system (which we have previously addressed with you) in a subsequent letter.

Should you have any questions or comments concerning the above matter, please contact Peter Jan of my staff at (916) 341-6315 or me at (916) 341-6289, respectively. Alternatively, ESB staff may be reached by email at peter.jan@calrecycle.ca.gov or michael.wochnick@calrecycle.ca.gov.

Sincerely,



Michael B. Wochnick, P.E., Manager
Closure and Technical Support Section
Waste Permitting, Compliance, & Mitigation Division

cc: Anand Helekar, TRC
Wen Yang, Los Angeles Regional Water Quality Control Board
Kamili Siglowide, Department of Toxic Substances Control
Charles Tupac, South Coast Air Quality Management District
Kris L. Kazarian, BKK Corporation
Kelly MacGregor, BAS Construction

Attachment:
Staff Report - Landfill Gas Sampling and Laboratory Analyses Class III Landfill Gas Compliance Wells

¹Of the probes at issue in the past, GP-732 (aka GW732) remained available for sampling. GP-730 (aka GW730) and 535.51C (aka GW535.51C) were no longer available for sampling due in part to atmospheric intrusion into the probe, making them inadequate for continued compliance monitoring. (See Report, App. B, p. 5.)