

**MITIGATION MONITORING PROGRAM  
WCCSL BULK MATERIALS PROCESSING CENTER  
AND RELATED ACTIONS**

In accordance with the California Environmental Quality Act (CEQA), the Contra Costa County Community Development Department (CDD), serving as Lead Agency, prepared an Environmental Impact Report (EIR) for the West Contra Costa Sanitary Landfill (WCCSL) Bulk Materials Processing Center and Related Actions (Project). The EIR identifies the significant adverse impacts of the proposed Project activities. The Final EIR also identifies mitigation measures which, when incorporated, would reduce or eliminate these impacts with one exception. Emission increases from on-site sources would exceed the Bay Area Air Quality Management District (BAAQMD) significance thresholds for particulate matter (PM<sub>10</sub>). This impact cannot be mitigated to a less-than-significant-level and is a significant unavoidable impact of the proposed Project.

### **Overview**

Assembly Bill (AB) 3180 became law in California on January 1, 1989, and the requirements have been incorporated into Section 15097 of the CEQA Guidelines. Section 15097 requires all public agencies to adopt monitoring and reporting programs when they approve projects with EIRs or Negative Declarations that identify significant environmental impacts. **The monitoring and reporting program must be adopted when a public agency makes its findings under CEQA when the project is approved.** The program must be designed to ensure project compliance with mitigation measures during project implementation. If certain project impacts extend beyond the project implementation phase, long-term mitigation monitoring should be provided in the monitoring program.

### **Purpose**

The Mitigation Monitoring Program has been prepared to ensure that all required mitigation measures are implemented and completed in a timely manner as part of Project construction and operation and maintained in a satisfactory manner during Project implementation. The program may be modified by the CDD during Project construction and operation as necessary in response to changing conditions or other refinements. This program is designed in a checklist format for ease of use by the responsible parties. The checklist identifies the individual mitigation measures and the time frame for implementation, and assigns a party responsible to implement, monitor, and confirm the implementation of the mitigation measure. A description of the elements of the mitigation monitoring program is provided below.

## **MITIGATION MONITORING PROGRAM**

### **Management**

Unless otherwise specified herein, the WCCSL (Applicant) has the responsibility for taking all action necessary to implement the mitigation measure according to the specifications provided for each measure and to demonstrate to CDD that the action required by the mitigation measure has been successfully completed.

CDD will be responsible for overall administration of the Mitigation Monitoring Program and for verification. The CDD Director will designate a project manager to oversee the Mitigation Monitoring Program. Duties of the project manager include the following:

- Conduct routine inspections, plan checking, and reporting activities.
- Serve as a liaison between CDD and the Applicant regarding mitigation monitoring issues.
- Coordinate with agencies having mitigation monitoring responsibilities.
- Complete forms and checklists and maintain reports and other records and documents generated by the monitoring program.
- Coordinate and assure corrective actions or enforcement measures are taken, if necessary.

The Applicant will identify appropriate staff who will be responsible for coordination with CDD on the Mitigation Monitoring Program.

### **Reporting and Evaluation Schedule**

The Applicant will be submitting to inspections by CDD and other responsible agencies to determine if the Project is in compliance with state and federal regulations. As part of this Mitigation Monitoring Program, the Applicant shall prepare an annual monitoring report on the compliance of the Project with the required mitigation measures. Information from the CDD regarding the inspections shall be compiled and explained in the annual report, as well as supplementary information on each of the long-term environmental mitigation monitoring items. The narrative report will also include supporting statistical information, where necessary. The report shall be designed to simply and clearly identify whether required mitigation measures are being, or have been, adequately implemented. At a minimum, each report shall identify the mitigation measure or measures to be monitored for implementation, whether compliance with the mitigation measure or measures has occurred, the procedures and standards used in assessment of

compliance, times and dates of monitoring, name(s) of monitor(s), and whether further action is required. The reports shall be submitted to CDD for review and approval.

In addition to specific reporting requirements for monitoring of individual mitigation measures, the overall progress, completion, or violation of the Mitigation Monitoring Program shall be reported annually by the Applicant to CDD. Reports that identify successful progress on implementation of the Mitigation Monitoring Program or successful completion of the Mitigation Monitoring Program shall be reviewed and filed by CDD. These reports shall be available for public inspection.

If a report identifies one or more violations of the Mitigation Monitoring Program, CDD will take one of the following actions within 10 working days of the receipt of such report:

1. Directly notify the Applicant by telephone of the violation and attempt to obtain voluntary compliance.
2. Notify the Applicant of the violation in writing and request voluntary compliance.
3. Conduct a field inspection.
4. Initiate enforcement action.

CDD must review the annual report and provide a written response to the Applicant indicating whether the report is complete and satisfactory. If the report is found to be incomplete, the Applicant will submit the requested additional information within 30 days of notification by CDD. If the report's conclusions or data are found to be unsatisfactory, CDD will inform the Applicant whether or not technical peer review will be necessary. CDD will specify the type of additional work to be done and whether this can be accomplished by the Applicant or will require outside consultants.

### **Evaluation Checklist**

The annual monitoring report submitted by the Applicant will be evaluated by CDD to verify the success of mitigation measure implementation. Table 1, the Mitigation Monitoring Checklist that is included at the end of this document, should guide CDD in its evaluation and should be the basis for the reporting effort conducted by the Applicant.

The evaluation checklist is designed with the following categories:

**Condition #:** Refers to the condition of approval number given by CDD to each of the required mitigation measures.

Mitigation

Measure: Contains the text of mitigation measures applicable to the Mitigation Monitoring Program. Mitigation measures have been cross-referenced where applicable and represent the full text of the measures as stated in Chapter 1 of the Responses to Comments Document.

Party

Responsible for Implementation: Identifies the party or parties responsible for complying with all the requirements of the mitigation measure. In most cases, the Applicant will be responsible for conforming to the mitigation measure.

Monitoring

Triggers/  
Frequency: Monitoring triggers are the time frame that monitoring is triggered and should occur. The trigger for starting the monitoring and the frequency of mitigation monitoring are identified in the table and abbreviated as follows:

A	Annual
AS	As Needed
C	Continuous
DO	During Operation
DPC	During Project Construction
FEIRC	Following Environmental Impact Report Certification
FCBST	Following Completion of Biosolids Spreading Trials
FLCL	Following Final Closure
ODO	Ongoing During Operation
ODPC	Ongoing During Post Closure
PC	Prior to Construction
PD	Project Design
PTBST	Prior to Biosolids Spreading Trials
PTFSI	Prior to Full-Scale Implementation
PTO	Prior to Operation
W	Weekly

Reporting

Milestone/  
Schedule: The reporting milestone or schedule for reporting monitoring is noted in column 5 of the Mitigation Monitoring Checklist. The reporting schedule is the frequency or approximate time frame in which the mitigation monitoring reporting will take place. This is the time or frequency that the receiving and approving parties will receive documentation on monitoring compliance. These milestones or time frames may also correspond to the time frames and abbreviations noted in the Monitoring Triggers and

Frequency. The types of milestones typically reported in the matrix are during Project design, Project construction, ongoing during operation and during other time frames as noted.

Compliance:

Compliance details: (1) the procedures and standards for monitoring implementation of mitigation measures and for assessing adequate implementation of or compliance with mitigation measures, (2) type of compliance action that is necessary to ensure that the mitigation measure is adequately performed and documented, and (3) the dates of site inspections. The compliance action is the action for which the responsible party is accountable. Typically, the Applicant will prepare documentation to be submitted to CDD and, in some cases, to a Responsible Agency where noted. The typical types of compliance actions noted include written reports and documentation (such as logs) and periodic site inspections.

This program recommends that a monthly construction report (MCR) be prepared by the Applicant to demonstrate construction mitigation compliance. During construction, CDD will be making facility visits to review construction practices. In addition, the Applicant's site monitor shall keep a daily construction log that verifies implementation of construction measures. The Applicant will meet with the construction contractor to brief him/her on construction requirements prior to starting Project construction. All recommended applicable construction mitigation measures shall be included in the project drawings or plans and specifications (contract drawings).

The abbreviations are used as follows:

AR	Annual Report
CA	Compliance Agreement
IP	Interpretive Program
MCR	Monthly Construction Report
PCP	Post Closure Plan
PI	Periodic Inspection
PR	Progress Report
QR	Quarterly Report
PS	Signage Plan
SPECS	To be included in Project Drawings & Specifications (Contract Documents)
TR	Technical Report
WD	Written Documentation
WR	Written Report

**Report**

**Monitoring To:** CDD is responsible for ensuring monitoring program compliance. The compliance action, supporting documentation, and monitoring reports should ultimately be filed in the Mitigation Monitoring file for the Project, kept at CDD; however, occasionally, the monitoring would be required for special agencies, such as the BAAQMD. In these instances, CDD will request that the responsible party submit a duplicate copy to the appropriate Responsible Agency where the Mitigation Monitoring file is kept.

**Status:** The status column is for verification of compliance. The status column is to be initialed by CDD based upon the documentation provided by the Applicant, their agents (qualified individuals), responsible agencies, or through personal verification by CDD.

**Funding**

AB 3180 does not provide a specific funding mechanism for implementation of mitigation monitoring and reporting programs. However, public agencies have the authority to levy charges, fees, or assessments to pay for the program, just as they currently do for the preparation of EIRs. For the implementation of the Project, the Applicant will be responsible for the costs of mitigation monitoring. The conditions of approval require that the Applicant be financially responsible for implementation of mitigation monitoring.

**Table 1. Mitigation Monitoring Checklist**

Condition no.	Mitigation measure	Party responsible for implementation	Monitoring trigger/frequency	Reporting milestone/schedule	Compliance			Report monitoring to	Status
					Procedures/standards	Action	Date		
<b>Chapter 4. Land Use, Plans, and Policies</b>									
1	4.4(a): The County and Authority would revise their NDFEs to include the proposed WRC at the BMPC as a transfer facility (non-disposal facility) pursuant to Article 7, Chapter 9, Division 7 of Title 14 of the California Code of Regulations.	CDD/Authority	FEIRC	FEIRC		WD/AR		CDD/Authority	
2	<p>4.5(a): The agency(ies) with applicable permit authority (County, City, or LEA) and mitigation monitoring responsibility would require that applicable permits contain conditions of approval specifying the following:</p> <ul style="list-style-type: none"> <li>Mitigation Fee. The facility operator shall pay a mitigation fee of an amount to be determined by the applicable permitting authority(ies) to defray annual costs associated with collection and disposal of illegally dumped waste and associated impacts in North Richmond and adjacent areas. The mitigation fee should be subject to the joint control of the city and County and should be collected on all solid waste and processible materials received at the facility consistent with the existing mitigation fee collected at the Central IRRF.</li> </ul>	Applicant	A	A		WD/AR		CDD/City/LEA	

**Table 1. Mitigation Monitoring Checklist (continued)**

Condition no.	Mitigation measure	Party responsible for implementation	Monitoring trigger/frequency	Reporting milestone/schedule	Compliance			Report monitoring to	Status
					Procedures/standards	Action	Date		
<b>Chapter 4. Land Use, Plans, and Policies (continued)</b>									
	<ul style="list-style-type: none"> <li>Agency Coordination. Facility operator shall participate in County or City task forces and pilot programs established to address illegal dumping in North Richmond and adjacent city areas.</li> </ul>	Applicant	ODO	ODO		QR/AR		CDD/City/LEA	
	<ul style="list-style-type: none"> <li>Off-Site Debris and Litter Policing. The facility operator shall provide weekly debris and litter cleanup of Parr Boulevard from the Richmond Parkway to the facility entrance and roads within the “Hotspot Zones 1-6” identified in Table 4-3 and Figure 4-5 of the EIR and on other access roads as directed by the permitting authority(ies). As needed, the permitting authority(ies) may require more frequent policing to control debris or litter.</li> </ul>	Applicant	W/AS	W/AS		QR/QR		CDD/City/LEA	
	<ul style="list-style-type: none"> <li>Littering Signs. The facility operator shall install and maintain signs noting littering and illegal dumping laws and penalties along Parr Boulevard (the main access road to the facility) and the following other access roads:</li> </ul>	Applicant	DPC/C	DPC/C		SP/AR		CDD/City/LEA	

**Table 1. Mitigation Monitoring Checklist (continued)**

Condition no.	Mitigation measure	Party responsible for implementation	Monitoring trigger/frequency	Reporting milestone/schedule	Compliance			Report monitoring to	Status
					Procedures/standards	Action	Date		
<b>Chapter 4. Land Use, Plans, and Policies (continued)</b>									
	<ul style="list-style-type: none"> <li>○ Richmond Parkway, from Parr Blvd. to Gertrude Ave.</li> <li>○ Pittsburg Ave., from Richmond Parkway to 3<sup>rd</sup> Street</li> <li>○ Market Ave., from 1<sup>st</sup> Street to the SPRR tracks.</li> <li>○ 3<sup>rd</sup> Street, from Market Ave. to Grove Ave.</li> <li>○ 5<sup>th</sup> Street, from Verde Ave. to Chesley Ave.</li> <li>○ Battery Street, from Alamo Ave. to Vernon Ave.</li> <li>○ Kelsey Street at the SPRR tracks.</li> <li>• The permitting authority(ies) may designate other roads for signage as needed. The text on the signage should be subject to the review and approval of the permitting authority(ies).</li> </ul>	Applicant	DPC	DPC		SP/QR/AR		CDD/City/LEA	

**Table 1. Mitigation Monitoring Checklist (continued)**

Condition no.	Mitigation measure	Party responsible for implementation	Monitoring trigger/frequency	Reporting milestone/schedule	Compliance			Report monitoring to	Status
					Procedures/standards	Action	Date		
<b>Chapter 4. Land Use, Plans, and Policies (continued)</b>									
	<ul style="list-style-type: none"> <li>Hotline. The facility operator shall establish an Illegal Dumping Hotline phone number for use by residents and businesses to report incidences of illegal dumping in the North Richmond area. The hotline phone number shall be prominently listed on all “littering signs” described above. Reports or complaints shall be investigated within 24 hours. Verified incidents of illegal dumping or litter or debris shall be collected within 24 to 48 hours of verification, unless additional time is allowed by the applicable permitting authority</li> </ul>	Applicant	DPC/C	DPC/C		SP/QR/AR		CDD/City/LEA	
	<ul style="list-style-type: none"> <li>Reporting Requirements. The facility operator shall maintain records regarding all complaints/reports and actions taken to respond including locations, dates, and times. Records shall be made available to the County or City upon request.</li> </ul>	Applicant	C	C		QR/AR		CDD/City/LEA	

**Table 1. Mitigation Monitoring Checklist (continued)**

Condition no.	Mitigation measure	Party responsible for implementation	Monitoring trigger/frequency	Reporting milestone/schedule	Compliance			Report monitoring to	Status
					Procedures/standards	Action	Date		
<b>Chapter 5. Geology, Soils, and Seismicity</b>									
3	5.5(a): Geotechnical studies would be performed for each proposed/renovated site structure to be located on waste fill that evaluate impacts of landfill settlement on building performance, as well as additional settlement, if any, caused by new structures, and recommendations included in construction plans and specifications.	Applicant	PD	PD		TR/SPECS/AR		CDD/City/RWQCB	
4	5.5(b): Flexible utility connections would, if deemed necessary, be considered to reduce damage to utilities resulting from differential settlement between buildings and the surrounding ground.	Applicant	PD	PD		MCR/SPECS/AR		CDD/City/RWQCB	
5	5.5(c): Settlement of buildings would be addressed in WCCSL Post-Closure Plan with monitoring and repair as needed.	Applicant	ODPC	ODPC		PCP/AR		CDD/City/RWQCB	
6	5.6(a): If new fill is placed for construction of the proposed WRC, additional studies would be performed to evaluate settlement, slope stability, and potential impacts on the integrity of the soil-attapulgate slurry wall with recommendations included in construction plans and specifications.	Applicant	PD	PD		TR/SPCS/AR		CDD/RWQCB	
7	5.6(b): Periodic monitoring would be consistent with the recommendations of Mitigation Measure 5-6(a) to evaluate the condition of the soil-attapulgate slurry wall and appropriate repairs made as necessary	Applicant	DO	DO		PI/QR/AR		CDD/RWQCB	

**Table 1. Mitigation Monitoring Checklist (continued)**

Condition no.	Mitigation measure	Party responsible for implementation	Monitoring trigger/frequency	Reporting milestone/schedule	Compliance			Report monitoring to	Status
					Procedures/standards	Action	Date		
<b>Chapter 5. Geology, Soils, and Seismicity (continued)</b>									
8	5.8(a): A plan for inspection and as-needed repair of the GCL following an earthquake would be added to the Post-Closure Plan.	Applicant	PD	PD		PCP/PI/AR		CDD/City/RWQCB	
9	5.9(a): If new fill will be placed for construction of the proposed WRC, additional studies would be performed to evaluate potential settlement, slope stability, and movement of the soil-attapulgitic slurry wall and recommendations would be incorporated into construction plans and specifications.	Applicant	PD	PD		TR/SPECS/AR		CDD/RWQCB	
10	5.10(a): To ensure proper structural design, a geotechnical report would be prepared for all new buildings with recommendations incorporated into construction plans and specifications (see Mitigation Measure 5.5(a)). The geotechnical report would discuss the potential for differential ground surface settlement and the need for flexible utility connections (see Mitigation measure 5.5(b)).	Applicant	PD	PD		TR/SPECS/AR		CDD/City/RWQCB	
<b>Chapter 6. Water Resources</b>									
11	6.4(a): Upon completion of the additional biosolids spreading trials per Control Measure 6-4(d), the Applicant would prepare a Progress Report for RWQCB review and approval. The Progress Report would include, at a minimum, the following:	Applicant	FCBST	FCBST		PR/AR		CDD/City/RWQCB	

**Table 1. Mitigation Monitoring Checklist (continued)**

Condition no.	Mitigation measure	Party responsible for implementation	Monitoring trigger/frequency	Reporting milestone/schedule	Compliance			Report monitoring to	Status
					Procedures/standards	Action	Date		
<b>Chapter 6. Water Resources (continued)</b>									
	<ul style="list-style-type: none"> <li>• Purpose of Biosolids Spreading</li> <li>• Approach and Methodology</li> <li>• Results</li> <li>• Environmental Controls</li> <li>• Conclusions and Recommendations</li> <li>• Other Components Deemed Necessary by the RWQCB</li> </ul> <p>The Progress Report should demonstrate the maximum acceptable biosolids loading rate, given available site area and physical constraints and the need to maximize drying and to control runoff.</p>								
<b>Chapter 8. Traffic and Circulation</b>									
12	8.3(a): A pavement monitoring program would be undertaken by Applicant for the Parr Boulevard connection to Richmond Parkway. The program would provide before and after video evidence of pavement conditions, and may require the posting of a pavement repair bond. Applicant would coordinate with the Maintenance Division of the County Public Works Department regarding the details of the monitoring program and any requirements for road repair	Applicant	PC/FLCL	PC/FLCL		WD/AR		CDD/City/CPW	

**Table 1. Mitigation Monitoring Checklist (continued)**

Condition no.	Mitigation measure	Party responsible for implementation	Monitoring trigger/frequency	Reporting milestone/schedule	Compliance			Report monitoring to	Status
					Procedures/standards	Action	Date		
	should they become necessary.								
<b>Chapter 9. Biological Resources</b>									
13	9.1(a): The interpretive program proposed by the Applicant would be developed in consultation with the Bay Conservation Development Commission (BCDC) and DFG to educate Trail users of the sensitivity of the marshland and open water habitat to wildlife, the prohibition on take and harassment of special-status species, and the requirement of staying on the Public Trail to minimize disturbance to sensitive wildlife.	Applicant	PD	PD		IP/AR		CDD/City/BCDC/DFG	
14	9.1(b): Adequate controls would be developed as part of the interpretive program to prevent human access into the San Pablo Creek Marsh habitat along the Phase 3 segment of the Trail north of the WCCSL. This may require use of exclusionary fencing, and shall at minimum include installation of permanent signage at 100-foot intervals which states:	Applicant	PD	PD		IP/PI/AR		CDD/City/BCDC/DFG	
	No Trail Access Sensitive Wildlife Habitat Visitor Access Prohibited								
15	9.1(c): As currently proposed, dogs would be prohibited from using the Trail. Permanent signage would be installed as part of the interpretive program at the trailhead and as separate permanent signs within 100 yards of the beginning of the northern and southern Trail segments	Applicant	DPC	DPC		MCR/AR		CDD/City/BCDC/DFG	

**Table 1. Mitigation Monitoring Checklist (continued)**

Condition no.	Mitigation measure	Party responsible for implementation	Monitoring trigger/frequency	Reporting milestone/schedule	Compliance			Report monitoring to	Status
					Procedures/standards	Action	Date		
	explaining the sensitivity of the area								
<b>Chapter 9. Biological Resources (continued)</b>									
	and clearly state “No Dogs Allowed.” Signage would refer users to other local shoreline parks where dogs are permitted (e.g., Berkeley Shores Park, Point Isabel). Experience gained from operation of the Trail would be used by the appropriate entities to determine whether additional enforcement measures are necessary and possible funding measures.								
16	9.1(d): As directed by appropriate agencies, the Applicant would coordinate efforts on predator control of feral cats, dogs, and red fox.	Applicant	C	C		AR		CDD/City/BCDC/DFG	
17	9.1(e): All construction activities on the levees, including installation of any Trail improvements and the barrier landscape plantings, would be prohibited during the nesting season for salt marsh, dependent bird species, from February 1 through July 31.	Applicant	DPC	DPC		SPECS/MCR/PI/AR		CDD/City/BCDC/DFG	
18	9.1(f): Trail improvements would be restricted to uplands, the tops of existing levees, and the existing roadway along the south side of San Pablo Creek to minimize further disturbance in the adjacent marsh and riparian habitats.	Applicant	DPC	DPC		SPECS/PI/AR		CDD/City/BCDC/DFG	
19	9.1(g): due to the possible hazard to trail users, the Bayside Trail (Barrier) Planting Recommendation would be revised to eliminate poison oak from the revegetation planting palette and	Applicant	PD	PD		WD/AR		CDD/City/BCDC/DFG	

**Table 1. Mitigation Monitoring Checklist (continued)**

Condition no.	Mitigation measure	Party responsible for implementation	Monitoring trigger/frequency	Reporting milestone/schedule	Compliance			Report monitoring to	Status
					Procedures/standards	Action	Date		
	from any future landscaping plans for the Project.								

**Chapter 9. Biological Resources (continued)**

20	9.3(a): Any modifications to the shoreline of San Pablo Bay required as part of the construction of the staging area for the interpretive program at the southern end of Area C would be coordinated with the Corps and BCDC and appropriate authorizations obtained prior to any modifications to the shoreline and open water of San Pablo Bay.	Applicant	PD	PD		IP/ MCR/ PI/AR		CDD/City/BCDC/ DFG	
21	9.4(a): The Phase 4 alignment of the Public Access Trail would be eliminated from the proposed Project to avoid the resulting disturbance to shoreline habitat on this portion of the site and prevent the potential disruption to wildlife habitat along the existing isolated levee segment. The proposed Phase I Trail improvements from the southern end of the mainland levee along the west side of Area C to the first breach in the outer levee would also be eliminated from the proposed Project, serving to minimize potential disturbance to approximately half the open water and mudflat habitat in Area C. Split rail fencing or similar barrier would be installed within 10 yards of the point where the levee narrows north of the proposed kayak staging area.	Applicant	PD	PD		WD		CDD/City/BCDC/ DFG	
22	9.4(b): Permanent signage would be installed as part of the required interpretive program at the southern end of the levee along the west side of	Applicant	DPC	DPC		IP/ MCR/ PI/AR		CDD/City/BCDC/ DFG	

**Table 1. Mitigation Monitoring Checklist (continued)**

Condition no.	Mitigation measure	Party responsible for implementation	Monitoring trigger/frequency	Reporting milestone/schedule	Compliance			Report monitoring to	Status
					Procedures/standards	Action	Date		
	end of the levee along the west side of Area C which deters visitor access to this segment of the levee.								

**Chapter 9. Biological Resources (continued)**

	<p>The signage would be installed at 20-foot intervals across the width of the levee, within 10 yards of the point where the levee narrows north of the proposed kayak staging area.</p> <p>The signage would state:</p> <div style="border: 1px solid black; padding: 5px; width: fit-content; margin: 10px auto;"> <p>No Trail Access Sensitive Wildlife Habitat Visitor Access Prohibited</p> </div>								
23	<p>9.4(c): Permanent signage would be installed as part of the required interpretive program on both sides of the water access at the proposed kayak staging area to inform kayak users that access into the sloughs of the coastal salt marsh to the southeast is prohibited during the nesting season to prevent possible disturbance to rails and other wildlife. The signage would state:</p> <div style="border: 1px solid black; padding: 5px; width: fit-content; margin: 10px auto;"> <p>Sensitive Wildlife Habitat No Kayak Access to Marshland and Sloughs During Bird Nesting Season - February 1 through August 31.</p> </div>	Applicant	DPC	DPC		IP/ MCR/ PI/AR		CDD/City/BCDC/ DFG	

**Chapter 10. Air Quality and Odor**

**Table 1. Mitigation Monitoring Checklist (continued)**

Condition no.	Mitigation measure	Party responsible for implementation	Monitoring trigger/frequency	Reporting milestone/schedule	Compliance			Report monitoring to	Status
					Procedures/standards	Action	Date		
24	10.1(a): All active construction areas would be watered at least twice daily and more often during windy periods (20 mph or higher).	Applicant	DPC	DPC		SPECS/MCR/PI/AR		CDD/City/LEA	
<b>Chapter 10. Air Quality and Odor (continued)</b>									
25	10.1(b): All trucks hauling soil, sand, and other loose materials would be covered or required to maintain at least 2 feet of freeboard.	Applicant	DPC/DO	DPC/DO		SPECS/MCR/PI/AR		CDD/City/LEA	
26	10.1(c): All unpaved access roads, parking areas and staging areas at construction sites would be paved, watered at least twice daily or more often if windy, or receive applications of non-toxic soil stabilizers.	Applicant	DPC/DO	DPC/DO		SPECS/MCR/PI/AR		CDD/City/LEA	
27	10.1(d): All paved access roads, parking areas and staging areas at construction sites would be swept daily with water sweepers.	Applicant	DPC/DO	DPC/DO		SPECS/MCR/PI/AR		CDD/City/LEA	
28	10.1(e): Inactive construction areas would be hydroseeded or non-toxic soil stabilizers would be applied.	Applicant	DPC	DPC		SPECS/MCR/PI/AR		CDD/City/LEA	
29	10.1(f): Exposed stockpiles (dirt, sand, etc.) would either be enclosed, covered, watered twice daily or more often if windy unless a non-erosive soil crust is maintained, or receive application of non-toxic soil stabilizers.	Applicant	DPC/DO	DPC/DO		SPECS/MCR/PI/AR		CDD/City/LEA	
30	10.1(g): Traffic signage would limit traffic speeds on unpaved roads to 15 mph.	Applicant	DPC/DO	DPC/DO		SPECS/PI/AR		CDD/City/LEA	

**Table 1. Mitigation Monitoring Checklist (continued)**

Condition no.	Mitigation measure	Party responsible for implementation	Monitoring trigger/frequency	Reporting milestone/schedule	Compliance			Report monitoring to	Status
					Procedures/standards	Action	Date		
<b>Chapter 10. Air Quality and Odor (continued)</b>									
31	10.2(a): The Applicant would, at the earliest practical date, prepare applications to the BAAQMD for new sources proposed to be located at the site, obtain required BAAQMD permits, and comply with all permit conditions.	Applicant	PD	PD		WD/AR		CDD/City/BAAQMD	
32	10.5(a): The turning of the windrows would be limited when the wind is blowing inland toward potential receptors. Turning and screening operations would be curtailed when wind speeds exceed 20 mph toward developed areas.	Applicant	DO	DO		QR/PI/AR		CDD/City/LEA	
33	10.5(b): An appropriately sited wind monitoring station would be installed with an alarm to indicate the occurrence of winds greater than 20 mph.	Applicant	PTO	PTO		WD/AR		CDD/City/LEA	
34	10.5(c): A one-year composting demonstration project would be conducted under the review and oversight of the LEA and the BAAQMD. The demonstration project would focus on all feedstocks with a high nuisance odor potential and would identify composting operations and controls necessary to assure an efficient operation that would control odors under various climatic conditions. Based on the results of the demonstration project, the LEA and the BAAQMD would determine under what conditions these feedstocks could be used at the	Applicant	PTFSI	PTFSI		WR/AR		CDD/City/LEA/BAAQMD	

**Table 1. Mitigation Monitoring Checklist (continued)**

Condition no.	Mitigation measure	Party responsible for implementation	Monitoring trigger/frequency	Reporting milestone/schedule	Compliance			Report monitoring to	Status
					Procedures/standards	Action	Date		
	Composting facility as part of the								

**Chapter 10. Air Quality and Odor (continued)**

	<p>Composting Facility permitting process. The demonstration project shall include, but not e limited to:</p> <ul style="list-style-type: none"> <li>• The scale of the demonstration project would duplicate the pile size and operational factors of the planned facility, so that valid data are collected at full-size operation.</li> <li>• The span of feedstock combinations would encompass the range of expected future options, concentrating on worst-case combinations from processing, operations, and odor standpoints.</li> <li>• Monitoring during the demonstration period would include standard compost processing monitoring parameters as well as odor emission data during different operating and climate/wind conditions. Odor data would include emissions of critical constituents such as reduced sulfur compounds and reduced nitrogen compounds, as well as total odor emission data collected via odor panel with flux</li> </ul>								
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**Table 1. Mitigation Monitoring Checklist (continued)**

Condition no.	Mitigation measure	Party responsible for implementation	Monitoring trigger/frequency	Reporting milestone/schedule	Compliance			Report monitoring to	Status
					Procedures/standards	Action	Date		
	chamber protocols. The								

**Chapter 10. Air Quality and Odor (continued)**

	<p>Applicant shall help design the odor monitoring program with regulatory agency input and oversight. Downwind odor data would be collected concurrent with pile or source emission data to correlate the impacts.</p> <ul style="list-style-type: none"> <li>Odor impacts from demonstration scale will be extrapolated for the full-scale system through odor modeling or similar approach that achieves valid predictions of odor from the large proposed system.</li> <li>Odor data collection would be identified for any compost leachate liquid or storm water runoff liquid coming from the demonstration piles/area.</li> </ul>								
35	<p>10.7(a): The feasibility of WCWD providing short-term lagoon storage (2 to 3 months) of anaerobically digested sludge (i.e., a slurry in a lagoon) with a liquid aerobic cap would be demonstrated and evaluated. This evaluation shall include, but is not limited to, the following measures:</p>	Applicant	PTBST	PTBST		WR/AR		CDD/City/ RWQCB/LEA	

**Table 1. Mitigation Monitoring Checklist (continued)**

Condition no.	Mitigation measure	Party responsible for implementation	Monitoring trigger/frequency	Reporting milestone/schedule	Compliance			Report monitoring to	Status
					Procedures/standards	Action	Date		
<b>Chapter 10. Air Quality and Odor (continued)</b>									
	<ul style="list-style-type: none"> <li>Short-term lagoon storage approach would be demonstrated to reduce odor impacts with spraying of sludge on the landfill sideslopes.</li> <li>Volatile solids reductions from lagoon feedstock to lagoon withdrawal material would be identified.</li> <li>Odor monitoring at the short-term lagoon storage system would be continued to confirm that this storage system in itself will not cause an odor problem.</li> <li>Operational criteria would be determined for lagoon feed rates and loading, sludge withdrawal, cap water maintenance, maintaining “aerobic” cap conditions, cap water covering all sludge material, lagoon supernatant handling, etc.</li> </ul>								
36	10.7(b): A liquid biosolids spreading demonstration project work plan would be prepared, under the review and oversight of the LEA and BAAQMD and demonstrate whether residual odor would be consistent with impact standards of the BAAQMD and the EIR. The results	Applicant	PTBST	PTBST		WR/AR		CDD/City/ RWQCB/LEA/ BAAQMD	

**Table 1. Mitigation Monitoring Checklist (continued)**

Condition no.	Mitigation measure	Party responsible for implementation	Monitoring trigger/frequency	Reporting milestone/schedule	Compliance			Report monitoring to	Status
					Procedures/standards	Action	Date		
	of Mitigation Measure 10-7(a) would determine whether sludge, which has								

**Chapter 10. Air Quality and Odor (continued)**

	<p>received short-term storage, can be integrated into the work plan. The work plan shall include, but not be limited to, the following items:</p> <ul style="list-style-type: none"> <li>Identify the types of biosolids that will spread in the demonstration program; i.e., digested sludge direct from digesters, sludge removed from lagoon after "X" months of storage, etc. Identify the analytical work that will be completed on such material to help identify odor impacts of spreading (percent solids, percent volatile solids, pH, ammonia, temperature, total reduced sulfur compounds, (TRS), etc.).</li> <li>Identify/define data that will be collected at the spray application site including area loading rates, spray flow rates, and nozzle pressures, spray distances, and data collected during spraying such as odor monitoring in the vicinity and downwind. Spraying would be conducted in different climate/wind conditions to establish potential for full-scale</li> </ul>								
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**Table 1. Mitigation Monitoring Checklist (continued)**

Condition no.	Mitigation measure	Party responsible for implementation	Monitoring trigger/frequency	Reporting milestone/schedule	Compliance			Report monitoring to	Status
					Procedures/standards	Action	Date		
	operation.								
<b>Chapter 10. Air Quality and Odor (continued)</b>									
	<ul style="list-style-type: none"> <li>Identify/define data that will be collected on water that runs off the application areas: quantity of water and data on BOD, SS, nutrient content (including ammonia). Fecal coliform density of any runoff solids would be determined.</li> <li>Identify the various conditions under which spraying will be limited such as time of day, wind/atmosphere conditions, precipitation conditions, frequency of application, and other conditions.</li> </ul>								
37	10.7(c): The liquid biosolids spreading demonstration project would be conducted under the review and oversight of the LEA and BAAQMD, and a report of findings prepared. The Applicant would demonstrate that liquid biosolids can be spray-applied as proposed without creating nuisance odor conditions. The LEA and BAAQMD would then determine under what conditions liquid biosolids can be spray-applied to the landfill slopes to provide the required odor control. The work plan shall include, but not be limited to the following items:	Applicant	PTBST	PTBST		WR/AR		CDD/City/ RWQCB/LEA/ BAAQMD	

**Table 1. Mitigation Monitoring Checklist (continued)**

Condition no.	Mitigation measure	Party responsible for implementation	Monitoring trigger/frequency	Reporting milestone/schedule	Compliance			Report monitoring to	Status
					Procedures/standards	Action	Date		
<b>Chapter 10. Air Quality and Odor (continued)</b>									
	<ul style="list-style-type: none"> <li>Analysis of data would be extrapolated to determine nearby area/downwind odor impacts from biosolids spraying operations. Atmospheric odor modeling would be used as necessary to make these predictions.</li> <li>Identify control measures that will provide acceptable odor, to include: limits on loading rates (liquid and solids loading), limits on type of biosolids applied, climate/wind restrictions, time of day restrictions, frequency of application, and other appropriate limits.</li> <li>Analyze information to identify the fate of biosolids pollutants, such as nutrients (nutrients taken up by site vegetation, or percolate downward into the final landfill cover, or contained in site runoff, transformed to gaseous release to atmosphere, etc.), and similar fate for biosolids metals and also for residual pathogens within biosolids.</li> </ul>								
<b>Chapter 11. Health and Safety</b>									
38	11.7(a): WCCSL employees would have the necessary inoculations prior	Applicant	PTBST	PTBST		WD/AR		CDD/City	

**Table 1. Mitigation Monitoring Checklist (continued)**

Condition no.	Mitigation measure	Party responsible for implementation	Monitoring trigger/frequency	Reporting milestone/schedule	Compliance			Report monitoring to	Status
					Procedures/standards	Action	Date		
	to their participation in the biosolids spreading program.								

**Chapter 11. Health and Safety (continued)**

39	<p>11.7(b): The Applicant would demonstrate to the RWQCB that lagoon storage of biosolids at the WCWD produces Class A biosolids pursuant to 40 CFR 503 regulations. This demonstration shall include, but is not limited to, the following:</p> <ul style="list-style-type: none"> <li>• A work plan would be prepared which identifies the pathogen and related testing that will be completed on the biosolids. The work plan would be reviewed by the RWQCB and the EPA Region 9 Sludge Coordinator before beginning the work.</li> <li>• Upon approval of the work plan, pathogen testing work would be completed on digested sludge and sludge withdrawn from the storage lagoon to determine if Class A pathogen densities have been achieved.</li> <li>• Lagoon operational parameters would be defined during this testing work that would then be used in the future to help define the conditions under which Class A material is produced – conditions such</li> </ul>	Applicant	PTFSI	PTFSI		TR/AR		CDD/City/ RWQCB/EPA	
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**Table 1. Mitigation Monitoring Checklist (continued)**

Condition no.	Mitigation measure	Party responsible for implementation	Monitoring trigger/frequency	Reporting milestone/schedule	Compliance			Report monitoring to	Status
					Procedures/standards	Action	Date		
	as length of time within lagoon storage, feeding limitations, etc.								

**Chapter 11. Health and Safety (continued)**

40	<p>11.7(c): Lacking such a demonstration in Mitigation Measure (b) above, the Applicant would demonstrate to the RWQCB that a combination of Trail closure, rotational dried biosolids spreading, and fencing can be used to provide the necessary site restrictions to conform to 40 CFR 503 regulations and provide the necessary public health protection. The demonstration shall include, but not be limited to, the following:</p> <ul style="list-style-type: none"> <li>• Identify set-back distances/restrictions from the Trail and any other public-accessible area/locations.</li> <li>• Define fencing, signing, and related features that will be adequate to prevent public access to areas of biosolids application under certain site conditions.</li> <li>• Define other restrictions such as area closure during and after spreading/application, closure for certain periods of time or time of day, closure during rain, fog, or other situations.</li> </ul>	Applicant	PTFSI	PTFSI		TR/AR		CDD/City/RWQCB	
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**Table 1. Mitigation Monitoring Checklist (continued)**

Condition no.	Mitigation measure	Party responsible for implementation	Monitoring trigger/frequency	Reporting milestone/schedule	Compliance			Report monitoring to	Status
					Procedures/standards	Action	Date		
<b>Chapter 11. Health and Safety (continued)</b>									
41	<p>11.7(d): The Applicant would demonstrate to the RWQCB compliance with the vector attraction reduction requirements of 40 CFR 503 regulations. It is assumed Option 1 (Table 11-4) would be appropriate and involves demonstrating that the mass of volatile solids (VS) in the biosolids is reduced by a minimum of 38 percent during biosolids treatment. The minimum of 38 percent VS reduction in the treatment system can be demonstrated with either of the two following methods:</p> <ul style="list-style-type: none"> <li> <b>Direct Calculations.</b> The VS concentration in its influent and effluent biosolids samples will be monitored. Influent samples would be the 24-hour composite sample paced with the influent flow rates. Effluent samples could be daily grab samples. The mass of VS reduction can be calculated directly from the flow and VS concentration data. </li> <li> <b>Sludge Production.</b> The VS reduction is proportionate to the sludge production. From the biochemical oxygen demand and total suspended solids concentrations and </li> </ul>	Applicant	PTFSI	PTFSI		TR/AR		CDD/City/RWQCB	

**Table 1. Mitigation Monitoring Checklist (continued)**

Condition no.	Mitigation measure	Party responsible for implementation	Monitoring trigger/frequency	Reporting milestone/schedule	Compliance			Report monitoring to	Status
					Procedures/standards	Action	Date		
<b>Chapter 11. Health and Safety</b>									
	flow rate in the influent and effluent samples, the sludge production rate can be calculated and the reduction of VS mass can be verified								
42	11.1(a): The Applicant would comply with new revised Federal rule and revised California rule regarding composting and control of <i>Phytophthora ramorum</i> , expected some time in 2003. If finished compost or mulch is transported out of the quarantined area, a Compliance Agreement would be executed with the County Agricultural Commissioner at the required time and specified conditions therein followed.	Applicant	PTFSI	PTFSI		CA		CDD/City/LEA	

**Table 1. Mitigation Monitoring Checklist (continued)**

Responsible Party/Qualified Professional Columns 3 and 9		Monitoring Triggers/Frequency (Column 4) Reporting Milestone/Schedule (Column 5)		Compliance Action (Column 7)	
Applicant	West Contra Costa Sanitary Landfill, Inc.	A	Annual	AR	Annual Report
Authority	West Contra Costa Integrated Waste Management Authority	AS	As Needed	CA	Compliance Agreement
BAAQMD	Bay Area Air Quality Management District	C	Continuous	IP	Interpretive Program
BCDC	Bay Conservation and Development Commission	DO	During Operation	MCR	Monthly Construction Report
		DPC	During Project Construction	PCP	Post Closure Plan
City	City of Richmond	FEIRC	Following Environmental Impact Report Certification	PI	Periodic Inspection
		FCBST	Following Completion of Biosolids Spreading Trials	PR	Progress Report
CDD	Contra Costa County Community Development Department	FLCL	Following Final Closure	QR	Quarterly Report
CPW	Contra Costa County Public Works Department	ODO	Ongoing During Operation	SP	Signage Plan
		ODPC	Ongoing During Post Closure	SPECS	To be Included in Project Drawings and Specifications (Contract Documents)
DFG	Department of Fish and Game	PC	Project Construction	TR	Technical Report
EPA	U.S. Environmental Protection Agency, Region IX Judge Coordinator	PD	Project Design	WD	Written Documentation
		PTBST	Prior to Biosolids Spreading Trials	WR	Written Report
LEA	Local Enforcement Agency, Contra Costa Environmental Health	PTFSI	Prior to Full-Scale Implementation		
RWQCB	Regional Water Quality Control Board, North Region	PTO	Prior to Operation		
		W	Weekly		