Investigation Report

Regarding Complaints Received
October 2022 – November 2024

for

Upper Valley Disposal and Recycling Facility
1285 Whitehall Lane, St. Helena, Napa County

and

Clover Flat Resource Recovery Park (Clover Flat Landfill)
Class III Solid Waste Disposal Facility
4380 Silverado Trail, Calistoga, Napa County

California Regional Water Quality Control Board
San Francisco Bay Region

December 2, 2024

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1 Introduction

The San Francisco Bay Regional Water Quality Control Board (Regional Water Board) and Napa County have received numerous complaints from multiple parties regarding the current and former operations at two separate facilities in Napa County: Upper Valley Disposal and Recycling Facility (UV, Upper Valley, or Upper Valley Facility) in the City of St. Helena and the Clover Flat Resource Recovery Park (Clover Flat Landfill or CFL) in Calistoga. This investigation report identifies and responds to complaints made regarding these two facilities from October 2022 to November 2024 and that concern water quality impacts.[1] Any complaints relating to non-water quality issues outside of the Regional Water Board's jurisdiction (e.g., employee safety and training, equipment maintenance, and fire response) are excluded.

CalRecycle can certify and delegate authority to a local enforcement agency (LEA) in the permitting, closure and post closure, inspection, and enforcement at solid waste facilities within its jurisdiction per Title 14 and Title 27 of the California Code of Regulations. The Napa County Planning, Building and Environmental Services Department, and Environmental Health Solid Waste Division (collectively, Napa County LEA) is the authorized LEA for CalRecycle in Napa County. The Regional Water Board coordinated with the Napa County LEA, where applicable, when developing the responses below.

Any questions relating to a Regional Water Board or Napa County LEA response should be directed to the appropriate agency.

San Francisco Bay Regional Water Quality Control Board
Attn: Jessica Watkins, P.E.
1515 Clay Street, Suite 1400
Oakland, CA 94612
Jessica.Watkins@waterboards.ca.gov
(510) 622-2349

Napa County Planning, Building & Environmental Services
Attn: Peter Ex, REHS
1195 Third Street, Suite 210
Napa, Ca 94559
Peter.Ex@countyofnapa.org
(707) 253-4419

2 Summary of Findings

Regional Water Board and Napa County staff have investigated complaints made against both the Upper Valley Disposal and Recycling Facility and the Clover Flat Landfill from October 2022 through November 2024. The investigations focused on complaints related to water quality within our respective jurisdictions. Staff performed numerous inspections, document reviews, interviews with current and former

[1] Redacted copies of the original complaints can be provided upon request.

employees at both facilities, and responded to extensive inquiries from members of the public, non-governmental organizations, and state and federal agencies. Both the Regional Water Board and Napa County took these allegations seriously and maintained documentation of all correspondence to our agencies. The Regional Water Board will continue to monitor water quality at these facilities and identify, investigate, and direct the cleanup of per- and polyfluoroalkyl substances (PFAS) sources that could impact drinking water or aquatic habitat in alignment with our Strategic Workplan. Based on our investigation, we conclude that further investigation or pursuit of additional enforcement against Clover Flat Landfill or the Upper Valley Facility regarding the complaints is unwarranted.

3 Background

From 1963 to January 2023, Vista Corporation owned and operated Upper Valley and CFL. Waste Connections, Inc. is the current owner and operator of both facilities.

3.1 Upper Valley Disposal and Recycling Facility

The Upper Valley Facility (Figure 1) has been operating in the City of St. Helena as a material recovery facility since 1950, and a composting facility since 1974.

Material recovery operations take place in the Material Recovery Facility (MRF), which includes the loading, unloading, processing, and storage areas for commingled and source-separated residential and commercial recyclables. All recyclable materials brought to the MRF in collection vehicles are unloaded onto a tipping floor under the MRF canopy. The mixed recyclables are loaded onto a conveyor to move the material through the sorting process within the MRF building or may be directly loaded into transfer trailers and delivered for processing at another permitted facility. The recyclables processing activity is located within the 30,000-square-foot MRF Building and the outdoor 18,000-square-foot MRF area covered by a canopy.

Composting operations take place in a different location on the property and consist of processing green material, food waste, and agricultural materials collected from residential green bins or self-hauling. The compostable material is composted using aerated static piles over a duration of at least 4 weeks, followed by an additional 6 to 12 weeks for full curing, before being screened and stored in a finished product stockpile for sale to the public.

Composting Requirements

The Regional Water Board regulates composting operations at the Upper Valley Facility through State Water Resources Control Board (State Water Board) Order WQ 2015-0121-DWQ, “General Waste Discharge Requirements (WDRs) for Composting Operations,” as amended by State Water Board Order WQ 2020-0012-DWQ, “General WDRs for Commercial Composting Operations” (Composting General Order). The Composting General Order establishes requirements to protect groundwater and surface water quality, such as limiting the amount and

type of feedstocks composted, and establishing design, construction, and operation requirements. Upper Valley submitted an updated Technical Report and Notice of Intent (Upper Valley Technical Report) to enroll under the Composting General Order in October 2018 as a Tier II composting facility, and the Regional Water Board issued a Notice of Applicability of Coverage on January 15, 2019. The Technical Report describes how composting operations are managed at the Upper Valley Facility and includes several appendices with important information about how water is managed at the site, such as a Water and Wastewater Management Plan.

Stormwater Requirements

The Regional Water Board regulates stormwater at the Upper Valley Facility through State Water Board Order WQ 2014-0057-DWQ, as amended by State Water Board Order WQ 2015-0122-DWQ and Order WQ 2018-0028-DWQ, "General Permit for Storm Water Discharges Associated with Industrial Activities," which serves as both WDRs and a National Pollutant Discharge Elimination System (NPDES) permit (Industrial Stormwater General Permit as amended; NPDES Permit CAS000001). Stormwater sampling has been ongoing since 1992, when the Upper Valley Facility first applied for coverage under the Industrial Stormwater General Permit, and per the requirements of the Use Permit described below. Stormwater reports can be accessed on the online Stormwater Multiple Application and Report Tracking System (SMARTS) through the public user menu.

Napa County Property Use and Development Conditions

The County of Napa Planning Division regulates the Upper Valley Facility through Use Permit No. 92061-UP issued in 1994, and last modified in 2018 (see Attachment 1). The Use Permit allowed a change in land use from agricultural to use as a recycling facility for the processing of glass, paper, cardboard, aluminum, tin, and plastic, and the composting of grape pomace produced by Napa County wineries.

The Use Permit required that a minimum of six groundwater monitoring wells be installed and sampled quarterly for a suite of parameters that were later also required by the Composting General Order. Analytical reports for groundwater samples from 2005 to 2024 can be accessed on GeoTracker here.

The Use Permit states that Upper Valley must comply with stormwater monitoring and reporting requirements established to ensure County compliance with State Water Board Order No. WQ 2013-0001-DWQ, as amended by State Water Board Order Nos. WQ 2015-0133-EXEC, WQ 2016-0069-EXEC, WQ 2017-0031-DWQ, WQ 2018-0001-EXEC, and WQ 2018-0007-EXEC (Small Municipal Separate Storm Sewer Systems (MS4) General Permit as amended; NPDES Permit CAS000004). County of Napa Stormwater Program staff routinely inspect the Upper Valley Facility, in accordance with the Napa County Code, and uploads annual reports required by the Small MS4 General Permit to SMARTS.

Napa County Local Enforcement Agency Requirements

The Napa County LEA regulates composting operations at the Upper Valley Facility through a Solid Waste Facility Permit issued on March 16, 2020 (Facility Number 28-AA-0026; see Attachment 2). The Solid Waste Facility Permit specifies maximum daily/annual processing capacities, daily vehicle limits, operating hours, approved compost feedstock materials, etc. The Solid Waste Facility Permit lists several documents that describe and/or restrict the operation of the Upper Valley Facility, including the November 2019 Report of Compost Site Information (see Attachment 3).

The Report of Compost Site Information contains detailed facility operation descriptions that include, but are not limited to, the following: composting processes; site operations; facility layout; control methods for litter, odor, dust, noise, and fire; emergency response; and water supply. It also includes an Odor Impact Minimization Plan that specifies the control measures and complaint response procedures in place to prevent nuisance odors that may be generated as part of the compost process.

During routine monthly inspections, LEA staff review daily operating records, compost pile temperature logs, compost sampling and testing analysis, employee training records, and generally ensure the Upper Valley Facility is operating within the limitations of its permit.

3.2 Clover Flat Landfill

Clover Flat Landfill (Figure 2) is an active Class III municipal solid waste landfill that began accepting waste in 1963. Clover Flat Landfill is located on the Silverado Trail in Calistoga.

Landfill Requirements

The Regional Water Board regulates the landfill through waste discharge requirements Order No. R2-2020-0016 (landfill WDRs).

Composting Requirements

Clover Flat Landfill submitted an updated Technical Report and Notice of Intent to enroll under the Composting General Order in April 2021 to obtain coverage as a Tier II composting facility, and the Regional Water Board issued a Notice of Applicability of Coverage on June 28, 2021. While Clover Flat Landfill applied for coverage, composting operations have not and are not expected to be performed there.

Stormwater Requirements

Clover Flat Landfill is also covered by the State Water Board Industrial Stormwater General Permit. Stormwater sampling has been ongoing since 1992, when the facility first applied for coverage under the NPDES General Permit. Stormwater reports can be accessed on SMARTS.

Napa County Local Enforcement Agency Requirements

The LEA regulates the site through a Solid Waste Facility Permit issued July 30, 2014 (Facility Number 28-AA-0002; see Attachment 4). The LEA is responsible for enforcing the terms of the Solid Waste Facility Permit and applicable regulations, which specify maximum daily/annual processing capacities, remaining landfill capacity, etc. The Solid Waste Facility Permit lists several documents that describe and/or restrict the operation of Clover Flat Landfill, including the April 2013 Joint Technical Document and Subsequent Amendments. The Joint Technical Document contains detailed facility operation descriptions including, but not limited to, the following: landfilling operations; site plans; employee/public health and safety measures; control methods for litter, odor, dust, noise, leachate, vectors, and fire; emergency response; material storage times; water supply; and closure/post closure considerations.

During routine monthly inspections, LEA staff review daily operating records, tonnage records, landfill gas sampling records, load checking records, employee training records, and generally ensure the facility is operating within the limitations of its permit, and its operations do not pose a risk to employee/public health and safety or the environment. LEA staff also investigate complaints associated with the Clover Flat Landfill.

Enforcement

In March 2019, the Regional Water Board issued a Notice of Violation (NOV) for improper storage of both leachate and stormwater, and for the intentional release of a stormwater/leachate mixture into the unnamed creek along Clover Flat Landfill's eastern perimeter. The NOV cited Clover Flat Landfill's failure to comply with Order No. R2-2008-0027 (previous landfill WDRs) and the Industrial Stormwater General Permit.

In April 2019, the Regional Water Board issued Cleanup and Abatement Order No. R2-2019-0014 requiring corrective actions to address water quality violations and unauthorized discharges of landfill leachate to waters of the state, as detailed in the March 2019 NOV.

In August 2019, the Regional Water Board issued an Amendment to the Cleanup and Abatement Order (Order No. R2-2019-0027) to address ongoing sources of sediment caused by the lack of appropriate erosion and sediment controls at Clover Flat Landfill, and the potential for sediment deposited in the two unnamed creeks adjacent to Clover Flat Landfill to be mobilized and transported further downstream.

In January 2023, the Regional Water Board approved Settlement Agreement and Stipulation for Entry of Administrative Civil Liability Order No. R2-2022-1018, which imposed $619,400 in administrative civil liability against Clover Flat Landfill's former owner, Vista Corporation, doing business as Clover Flat Landfill, Inc., to resolve alleged violations of the Industrial Stormwater General Permit.

4 Complaints

From October 2022 to August 2024, Regional Water Board staff received multiple complaints with allegations against the Upper Valley Facility and Clover Flat Landfill. The complaints are summarized below and followed by separate staff responses from the Regional Water Board and Napa County LEA. For the full content and context of the complaints, please refer to the original complaints, which can be provided upon request.

The joint investigation efforts included review of the pertinent documentation for each facility, including permits and reports, interviews with current and former staff and management, and additional site inspections.

4.1 Upper Valley Disposal and Recycling Facility

4.1.1 UV Complaint 1: Wastewater Pond Contamination

Complaints expressed concern that the wastewater pond receives runoff from the MRF recycling area and truck wash water from the wash bay that may contain petroleum products or hazardous wastes.

4.1.1.1 Regional Water Board Response

Regional Water Board staff reviewed existing documents detailing the truck washing operation, which is described in the 2018 Use Permit modification and the 2023 Stormwater Pollution Prevention Plan (SWPPP; see Attachment 5). The Use Permit states that discharges of wastewater from equipment or vehicle washing must be properly disposed, and the SWPPP details the use of an oil/water separator to collect the oil from the wash water and use of a recirculation system to recirculate the wash water from the oil/water separator back into the truck wash station. The Use Permit states that discharges of wastewater from equipment or vehicle washing must be properly disposed. The SWPPP and SPCC detail the use of an oil/water separator to collect the oil from the truck wash water and a recirculation system for the wash water. “The facility contains an oil/water separator associated with the wash bay that collects runoff generated during the washing of trucks, equipment, bins, and boxes. Wash water collected in the oil/water separator is recycled for reuse in the wash bay and oil is sent offsite for recycling. Storm water does not enter the oil/water separator.”

Regional Water Board staff performed a follow-up inspection after receiving complaints to confirm that the oil separated from the wash water is collected and sent offsite for recycling. The only water that flows into the wastewater pond is compost leachate runoff and rainwater. The piping schematic in Figure 1 shows the locations of the “runoff culvert piping” and stormwater discharge locations; the figure shows there is no piping from the MRF or truck wash bay leading to the wastewater pond and site inspections have verified this. The recycling separation area for the recovery of glass, cardboard, and metal is under a canopy with no floor drains. A drop inlet located approximately 50 feet to the northeast of the operating area collects stormwater flowing across paved areas of the site, which

then flows to the storm drain, which is regulated under the Industrial Stormwater General Permit. The SWPPP describes how Upper Valley complies with stormwater management requirements in the Industrial Stormwater General Permit. Any liquid found to be emanating from the MRF is to be cleaned up using a spill kit located between the MRF and the vehicle maintenance area (shown on Figure 1) per the Spill Prevention Control and Countermeasure Plan (SPCC plan; see Attachment 6).

Regional Water Board staff requested additional analytical tests be run on the wastewater pond water to look for oil and grease and volatile organic compounds that were alleged to be discharging into the pond from the truck wash station and the MRF. The additional testing conducted in January 2023 showed both oil and grease and volatile organic compounds were not detected. The investigation in response to the complaint did not find evidence that runoff from the truck wash area or the MRF discharges into the wastewater pond at Upper Valley.

4.1.1.2 LEA Response

The LEA does not have oversight authority over the wastewater pond other than investigating nuisance issues related to pond odors, etc. The LEA does not currently have oversight authority of the MRF building. The MRF is currently subject to a County of Napa Planning Division Use Permit as stated in the Background section of this report. The LEA will have oversight of this operation through a Registration Tier Transfer/Processing Permit in the near future.

4.1.2 UV Complaint 2: Wastewater Pond Odors

Complaints expressed concern about the addition of chemicals to the wastewater pond to address odors. The LEA received complaints from nearby homeowners in the summer of 2021 regarding odors coming from the wastewater pond.

4.1.2.1 Regional Water Board Response

The LEA has provided Regional Water Board staff with information regarding the past use of chemicals to treat the pond to mitigate anaerobic conditions that can cause odors (see below).

During the timeframe the chemicals were applied, the compost piles were already covered for the winter after the large atmospheric event in late October 2021. The wastewater was not used to moisturize the piles after the chemical application until spring of 2022, almost six months later, at which time the dissolved oxygen levels in the pond had returned to normal conditions.

4.1.2.2 LEA Response

Upper Valley contracts with Heritage Systems, Inc. to perform quarterly wastewater pond sampling, including dissolved oxygen levels, pH, total suspended solids, and chemical and biological oxygen demand. Analytical testing

in summer 2021 showed the pond had gone anaerobic (i.e., there was not enough dissolved oxygen in the wastewater) and needed treatment to eliminate odors. The chemical used to treat the pond included hydrogen peroxide, Addox (a calcium-nitrate blend), and HIS (a liquid bacteria blend) provided by Heritage Systems, Inc. The most recent application of these products was on November 12, 2021, when 600 gallons of 34% hydrogen peroxide were used (see Attachment 7 for timeline of application). The only other treatment used to address pond odors are aerators, and two new ones were added in fall 2021 to help better oxygenate the pond.

4.1.3 UV Complaint 3: Leachate Discharge to Onsite Vineyards

Complaints expressed concern that leachate is frequently discharged from the wastewater pond after heavy rain events between fall 2021 and spring 2023 to the onsite vineyards near Whitehall Lane with authorization from the Regional Water Board. There are concerns that the leachate is a hazardous waste that can adversely impact the vineyards and groundwater quality.

4.1.3.1 Regional Water Board Response

Regional Water Board staff reviewed the Use Permit and Technical Report, and conducted interviews with onsite staff and Aptim consultants (who sample the groundwater monitoring wells and issue reports to the Regional Water Board).

Regional Water Board staff found that from 1994 to 2018, the Use Permit authorized use of compost processing water on “adjacent agricultural lands owned or controlled by the permit holder for the spray/evaporation of such treated waters.” In addition, the 1994 Solid Waste Facility Permit further states, “Additional reuse-disposal can be accomplished by supplemental irrigation of approximately 20 acres of vineyards.” However, the 2019 RCSI states that “Water from the onsite detention basin may be used for adding moisture to the composting operations or for dust control.” The current Solid Waste Facility Permit, issued in 2020, repeats this statement but does not allow leachate to be used for irrigation onsite.

In its 2018 Technical Report and Notice of Intent application for coverage under the General Composting Order, Upper Valley describes its wastewater detention pond disposal practices as follows:

> C.2.b Wastewater Detention Pond Water Use
>
> Disposal of wastewater from the pond is done as described in the [CUP]:
>
> 1. Onsite dust control
> 2. Moisture conditioning of compost materials
> 3. Evaporation

> Note that irrigation of adjacent grape fields is allowed in the Use Permit[; however], this discharge method has never been used nor is planned to [be] implemented."

According to this report, irrigation of adjacent vineyards has never been done at the Upper Valley Facility. We confirmed this by interviewing employees onsite, as well as Upper Valley's consulting firm, Aptim. During the heavy rain events between fall 2021 and spring 2023, Regional Water Board, Upper Valley, and Aptim staff discussed the capacity of the wastewater pond and the potential need for an emergency discharge to the vineyard. Ultimately, Upper Valley was able to secure enough storage tanks to hold the water prior to hauling offsite for disposal (see Response to 3.1.4 below for more information).

Regional Water Board staff conducted a follow-up interview with Upper Valley employees to verify that the onsite vineyards are irrigated with well water only.

Furthermore, if leachate from the wastewater pond were frequently discharged to adjacent vineyards, Regional Water Board staff would expect to see a chemical signature in the groundwater by this time. Regional Water Board staff reviewed existing quarterly groundwater monitoring data from 2005 through 2024 for the presence of chemicals, which would indicate an impact from site operations. There is no evidence of such groundwater impacts.

Out of an abundance of caution, the Regional Water Board has asked Waste Connections to install additional groundwater monitoring wells onsite to check for water quality impacts (see Attachment 8). This work was performed in October 2024.

4.1.4 UV Complaint 4: Leachate Not Hauled Offsite for Disposal

Complaints expressed concern that Upper Valley used leachate onsite instead of hauling leachate offsite for treatment during the 2022-2023 and 2023-2024 wet weather seasons when atmospheric river events filled up the wastewater pond.

4.1.4.1 Regional Water Board Response

A series of atmospheric river events began in October 2021 and continued to occur between the end of 2022 and early 2024. During this time, the wastewater pond reached capacity several times or had freeboard levels within two feet of the top of the pond levees. Regional Water Board staff continually communicated with Upper Valley and their consultant, Aptim, regarding options for reducing the water levels in the pond. Regional Water Board staff did not authorize discharge of leachate to the vineyards or anywhere on the site during that timeframe. In January 2023, Regional Water Board staff had internal discussions about whether to allow leachate to the onsite vineyards on an emergency basis; however, no water was released because Waste Connections (who had just taken ownership of Upper Valley) was able to get several storage tanks onsite to

lower leachate levels in the pond, and later transport the stored leachate to a publicly owned treatment works (POTW).

Regional Water Board staff communicated directly with the Santa Rosa POTW to confirm that leachate in the quantities stated by Upper Valley were disposed at the POTW during the dates of interest. In response, the Santa Rosa POTW provided a spreadsheet of all records from December 2019 through October 2023 verifying leachate from Upper Valley (and Clover Flat Landfill) was treated at this facility.

Waste manifests for disposal of leachate are kept at the Upper Valley Facility and can be reviewed upon request.

4.1.4.2 LEA Response

The LEA does not have oversight authority regarding this complaint but is not aware of any illegal discharges from the wastewater pond. The Upper Valley compost site's Solid Waste Facility Permit authorizes the use of pond water for compost moisture control.

4.1.5 UV Complaint 5: Hidden Piping Discharges to Creek, Homes, Vineyards

Complaints expressed concern that there are unmapped/underground pipes used to divert leachate from the wastewater pond into onsite homes, the adjacent creek, vineyards, as well as other onsite buildings (the Upper Valley office, break room, and shop). Complaints allege that there is a valve used to switch between use of leachate (from the wastewater pond) and potable water (from the onsite supply well) in the onsite potable water distribution system, resulting in contamination of potable water used onsite.

4.1.5.1 Regional Water Board Response

To follow up on complaints of unmapped piping, Regional Water Board staff reviewed existing piping schematics and requested Waste Connections to perform a ground-penetrating radar survey to look for any unmapped piping that may lead from the wastewater pond to the onsite homes. The ground-penetrating radar survey was performed on September 28, 2023, by Subtronic Corporation (Subtronic). No piping was discovered leading from the pond to the homes, as stated in our September 28, 2023, report uploaded to CIWQS here.

To further investigate the cross-connection allegation, Regional Water Board staff directed Upper Valley to have the sediment in the bottom of the water heaters in each home collected and analyzed at a laboratory for comparison to data collected from the leachate pond. If wastewater from the pond was being pumped to the homes, there should have been a similar chemical signature. The laboratory did not detect any of the same constituents in the water heater sediment that are commonly detected in the leachate pond (see Attachment 9 for water heater lab results).

Regional Water Board staff also interviewed two former residents of the onsite housing regarding water quality concerns. Neither of the two former residents said that they experienced any issues with the water supply or quality in the homes. The only source of water that flows into the onsite homes and office is from the groundwater supply well located between the office and the homes, which is permitted by the County and monitored annually for compliance with water quality criteria.

Only one valve was identified at Upper Valley, which allows wastewater pond water to be conveyed from the wastewater pond to trucks for either off-site disposal or onsite reuse.

While onsite on September 28, 2023, Regional Water Board and LEA staff investigated three additional areas of concern regarding alleged hidden piping conveying leachate to the creek. First, a 12-inch cast-iron pipe was observed in the creek directly across from the pond. The Use Permit states this pipe was formerly used for pond overflow, but to "allow complete utilization of the storage volume of the pond, the existing pipe overflows shall be capped". Waste Connections provided a 1994 site drawing (Figure 3) showing that this pipe appears to end at the berm and was capped. Subtronic first surveyed the pipe on September 28, 2023, but the signal was lost underneath the pond berm. Regional Water Board staff requested a follow-up survey with a camera to see where the pipe went. The camera survey was performed on January 25, 2024, but the pipe was filled with soil just a few feet into pipe from the creek. A final investigation was performed on June 10, 2024, to confirm this pipe was capped. The work was supervised by Waste Connections and staff from the Regional Water Board, the LEA, and the Federal Bureau of Investigation (FBI). All parties present agreed in the field that the pipe was capped in accordance with the detail provided on the 1994 drawing (Figure 3), and that leachate from the wastewater pond could not be discharged through this pipe into the creek.

The second concern investigated by Regional Water Board and LEA staff was a 36-inch diameter black PVC line that was observed in the creek at the northwest end of the property running to the southwest end beneath the perimeter road. The 36-inch diameter black PVC line is the creek bypass line required by the 1994 Use Permit and was permitted in 1994 by both the United States Army Corps of Engineers and Regional Water Board with a Clean Water Act section 404 and 401 permit, respectively (see reference in the Water and Wastewater Management Plan, Appendix C in the Upper Valley Technical Report). The purpose of the pipe is for flood protection by "providing additional capacity, in combination with the existing channel, so that improvements on the Upper Valley property will not adversely impact neighboring properties during a 100-year flood event."

Finally, the third concern investigated by Regional Water Board and LEA staff was a 2-inch diameter PVC pipe located in the northwest corner of the wastewater pond leading under the berm to an unknown location. The pipe did

not contain water at the time of the inspection. Waste Connections believes that the pipe may have been used to add fresh water from the onsite supply well and groundwater sump when pond levels were very low. Waste Connections committed to cutting and capping the pipe by the end of 2024 so that it no longer extends below the surface of the pond.

In summary, there is no evidence to support the allegation that hidden piping conveys leachate to homes, the creek, or adjacent vineyards based on the surveys conducted by Subtronic. Analytical testing of water heater sediment and quarterly groundwater monitoring data further supports this. Use of leachate to irrigate the onsite vineyards was permitted by the Use Permit, however, as noted in our response to Upper Valley Complaint 3.1.3, Waste Connections has confirmed that the vineyards are irrigated only with onsite supply well water.

4.1.6 UV Complaint 6: Unpermitted Frac Tanks and Spill Containment

Complaints expressed concern that there are unpermitted frac tanks onsite that do not have secondary containment for spills.

4.1.6.1 Regional Water Board Response

Upper Valley has onsite tanks that it uses for temporary leachate storage only; the tanks do not require permits from the Regional Water Board. As explained in the response to Complaint 3.1.4, above, the onsite storage tanks are used to store leachate when the pond levels get too high during wet weather. Upper Valley rents the tanks from Iron Clad Environmental Solutions (formerly Adler Tank Rentals). The tanks are cleaned by Iron Clad Environmental Solutions prior to shipment to the Upper Valley Facility. The tanks are underlain with minor containment for drips or leaks during transfer and operation, as Regional Water Board staff observed during site inspections (see Attachment 10 for photograph of secondary containment).

4.1.6.2 LEA Response

The onsite storage tanks are not required to be permitted by the LEA.

4.1.7 UV Complaint 7: Onsite Diesel Tank and Potential Contamination

Complaints expressed concern that there is a diesel fuel tank onsite that does not have proper containment in case of spills, and also that the secondary containment fills with stormwater and groundwater in the winter, leading to diesel contamination leaching into the groundwater.

4.1.7.1 Regional Water Board Response

The Regional Water Board does not permit the diesel fuel tank nor is it a part of staff's regular site inspections. Regional Water Board staff contacted the Napa County Division of Environmental Health (DEH), which is the Certified Unified

Program Agency (CUPA) for Napa County and performs annual inspections of the diesel tank for compliance with its hazardous materials regulations (see Attachment 11 for the 2023 inspection report). Upper Valley also provided its Spill Prevention, Control, and Countermeasures Plan (Attachment 6) for the facility, which describes the tank as a 10,000-gallon diesel tank located within a covered concrete secondary containment. Following up on the concern regarding groundwater contamination from diesel-impacted rainwater, Upper Valley staff confirmed that the rainwater and/or groundwater in the secondary containment is visually monitored by facility staff, then either used in the compost area or pumped and appropriately disposed offsite by Safety Kleen, when necessary.

4.1.8 UV Complaint 8: Onsite Leachate Use

Complaints expressed concern that untreated leachate containing hazardous wastes is used as moisture control in the compost piles, as dust control, and to put out fires.

4.1.8.1 Regional Water Board Response

As noted in Response 3.1.1 above, Regional Water Board staff requested additional analytical tests be run on the wastewater to look for oil and grease and volatile organic compounds that were alleged to be discharging into the pond from the truck wash station and the MRF. The additional testing in January 2023 showed that both oil and grease and volatile organic compounds were not detected. There is no evidence that runoff from the truck wash area or the MRF discharges into the wastewater pond. Leachate is also sampled quarterly for a variety of contaminants, required by both the Use Permit and the General Composting Order, and the data is presented in quarterly reports and uploaded to GeoTracker. There is no indication in the analytical data that hazardous materials are present in the leachate.

Leachate is used onsite for moisture conditioning of the compost piles and dust control. This is standard practice throughout the composting industry and is allowed by the General Composting Order (see Finding 23): “Wastewater refers to leachate or any other liquid flowing from, or on the working surface. That wastewater from the working surface may be conveyed to a detention pond. Wastewater may be reapplied to the compost piles as needed.” There are no requirements for the leachate to be treated prior to use for moisture-conditioning as the system essentially operates in a closed loop, with any runoff from moisture application (or fire containment application) being collected by leachate trenches and routed directly back to the pond.

4.1.8.2 LEA Response

The LEA concurs with the Regional Water Board response above. General fire response procedures are outlined in the previously referenced Upper Valley

Report of Compost Site Information document (see Attachment 3) and specify the use of the water truck.

The LEA is also aware of complaints about fires at the Upper Valley Facility received over a timeline ranging from October 2022 through April 2024. LEA staff has investigated reported past fires to the best of its abilities given the incidents occurred some time ago. For example, an LEA inspection on March 29, 2023, included review of site records of incident logs as part of investigation into complaints of compost fires occurring in the past (see Attachment 12, pages 13-14). The following notes were included in the inspection report:

> Following complaints regarding compost fires in the past at this site, the incident/daily logs were reviewed. Per a specific complaint from a former employee, numerous fires occurred during June/July 2021 and photos were included with the complaint. The complaint was received within the past two months, approx. 1.5 years after the supposed incidents. LEA staff specifically reviewed daily records during the June/July 2021 time frame. On 6/10/21 and 6/18/21 comments in the log stated "Hot spot, use water truck". The complainant was listed as the staff who entered and/or reported the issues. There was no mention of actual fires in the logs on these dates or within 1-2 weeks of these dates.

4.1.9 UV Complaint 9: Compost Contamination

Complaints expressed concern that the compost sold by the facility is contaminated due to use of leachate for moisture control, and that the compost is not actually organic as the owner claims.

4.1.9.1 Regional Water Board Response

Regional Water Board staff researched the process by which a compost facility can claim to be organic. Staff discovered that the compost produced by Upper Valley is certified organic according to the following website Digital Certificate Page | Organic Materials Review Institute (omri.org). Samples are sent to a laboratory semi-annually to ensure that compost meets the organic criteria (see Attachment 13). CalRecycle regulations (Title 14, CCR, Division 7, Subchapter 3.1) require that compost produced by commercial scale composting operations and facilities protect public health and safety. This includes testing product quality, including metal concentrations, physical contamination levels, and pathogen levels. Additionally, as stated above, the facility is permitted to use leachate from the composting operation for moisture conditioning of the compost piles. The process of composting itself generates enough heat to burn off any residual bacteria, such as coliform, that may have been present in the piles or introduced by the leachate. The compost leachate is analyzed quarterly and results can be found on GeoTracker here.

4.1.10 UV Complaint 10: Per- and Polyfluoroalkyl Substances (PFAS)

Complaints allege Regional Water Board staff mischaracterized the site in an internal email based on a review of records obtained through a Public Records Act request. Specifically, the complaint is regarding internal emails in which Regional Water Board staff discuss how to respond to the following question from a journalist:

> [H]as any PFAS testing been conducted at the [Upper Valley Facility]?

In an internal email, Regional Water Board staff proposed the following response:

> No PFAS sampling has been performed at the [Upper Valley Facility], as there is no cause to believe PFAS is present. This is a composting facility that only accepts organic material. Loads are hand checked prior to composting to remove anything that may cause contamination.

Complaints allege that Regional Water Board staff mischaracterized the site because it is not only a composting facility, but "… has been a full blown mixed recycling, waste and compost site for over 4 decades …"

4.1.10.1 Regional Water Board Response

The Regional Water Board understands that the Upper Valley Facility is both a composting facility and a material recycling and recovery facility, also referred to as a transfer station. Neither the Regional Water Board nor the State Water Board has identified these types of facilities as priorities for PFAS testing. Thus, the Regional Water Board has not required PFAS sampling at the Upper Valley Facility.

The Regional Water Board coordinates with the State Water Board's Division of Drinking Water and local water agencies to focus on identifying, investigating, and cleaning up PFAS sources that could impact drinking water or aquatic habitat. So far, the State Water Board has issued orders requiring PFAS investigations at landfills, airports, publicly owned treatment works (i.e., wastewater treatment plants), chrome plating facilities, and bulk fuel storage terminals and refineries. The Regional Water Board is currently prioritizing PFAS investigations at fire stations and other suspect discharge facilities in the vicinity of drinking water supply wells and surface waters.

Creek samples were collected for laboratory analysis of PFAS by private parties in October 2021 and reported to the Regional Water Board via email in February 2022. The samples were reportedly collected near the Upper Valley Facility in Bale Slough, though the exact locations were not provided. Data are provided in Attachment 14.

4.2 Clover Flat Landfill

4.2.1 CFL Complaint 1: Hidden Piping Discharging Stormwater and Leachate

Complaints expressed concern that there are unmapped/underground piping networks that divert leachate and contaminated stormwater into surface waters, instead of collecting and holding both for proper treatment and/or offsite disposal.

4.2.1.1 Regional Water Board Response

Regional Water Board staff reviewed piping schematics provided in Hydrologic Evaluation and Surface Water Management System Design Report and Evaluation of Leachate Storage and Stormwater Conveyance Systems for information on existing (or planned at the time of the reports) stormwater and leachate storage and conveyance designs. In coordination with the LEA, Regional Water Board staff also conducted several inspections to investigate allegations of hidden piping. The area specifically indicated to contain hidden piping (generally the area known as the “C&D” tipping pad) has been investigated by the Regional Water Board and LEA staff on numerous occasions over the past few years. This is in part because previous site managers and operators have made necessary repairs and/or improvements to leachate collection and stormwater conveyance systems, which is common at landfills. Investigations have been ongoing at the landfill since 2019 when the first unauthorized leachate release was reported. Since then, Regional Water Board staff has thoroughly walked and photographed the landfill, and has inspected all leachate storage and conveyance systems; no unmapped pipes have been encountered. Stormwater that has been impacted by landfill leachate is pumped to the leachate tanks before being hauled off site for disposal. Clean stormwater is routed directly to the creek and is sampled in accordance with the Industrial Stormwater General Permit.

Leachate is permitted for reuse within the lined footprint boundary for dust control (see landfill WDRs, finding 46); however, Waste Connections has confirmed leachate has not been used for dust control at the site since March 2023 and is hauled offsite to an approved POTW.

4.2.1.2 LEA Response

LEA staff inspects the Clover Flat Landfill on a monthly basis, and since 2019 has generally performed joint inspections with the Regional Water Board staff every quarter. During routine monthly inspections, LEA staff is vigilant to discuss potential issues involving the leachate/stormwater collection systems to prevent public contact with leachate. Special attention is given during all inspections to observe stormwater conveyance systems, leachate collection systems, and ensure there is no public contact with leachate and/or illegal discharges. In response to the hidden piping complaints, or when otherwise necessary, LEA and/or Water Board staff, within their specific authority, have required

investigations, corrections, reports, sampling, etc. Since 2019, the LEA has not observed any pipes that appear to intentionally discharge leachate or other contaminants offsite.

4.2.2 CFL Complaint 2: 2020 Glass Fire Impacts

Complaints expressed concern about the impacts from the Glass Fire that burned through the upper Napa Valley, including the Clover Flat Landfill, on September 27 and 28, 2020. Specific impacts of concern include burned leachate and methane collection systems. Complaints have alleged that there was significant damage to the landfill, and that local newspapers reported that the former owner claimed the landfill did not burn. Complaints also question why the Regional Water Board and LEA did not inform the public of potential toxic releases associated with the fire.

4.2.2.1 Regional Water Board Response

Regional Water Board staff communicated with the landfill's former owner on September 29, 2020, and received a number of photographs confirming that the office, scale house, engine flare, and leachate tanks were protected from the fire; and that the landfill gas well headers on the lower slopes burned, as well as the leachate collection system pump shed near the creek. Regional Water Board staff inspected the site on October 5, 2020 (Inspection Report). Coming out of the dry season, there was minimal leachate present in the collection trenches or sumps that would have been released when the pumps were off due to the power outage. The former owner's quote in the local newspaper that the "landfill is covered in dirt, so did not burn" is mostly accurate. The hay bales, straw waddles, and jute netting that had been installed as best management practices to reduce sediment load entering the creek were all burned, but nothing below those surficial items was damaged, and the active landfilling area was unimpacted.

The fire impacted much of the northern Napa Valley, and the Clover Flat Landfill was not the only site that was significantly impacted. Flareups were noted at some landfill gas headers until the power was able to be restored on October 8, 2020, and as stated above, minimal leachate was present in sumps or tanks that could not be pumped out while the power was down. Because the leachate holding tanks were not burned, any leachate stored within them was contained. If a release of leachate or impacted stormwater was observed, a notification would have been issued to the public. The Bay Area Air Quality Management District issued a notice of violation on October 22, 2020, requiring corrective action to get the gas collection system working within 10 days of the notice. The corrective actions were to reconnect 25 gas collection wells to the flare system, which was completed on October 28, 2020 (see Attachment 15). 18 of the 25 gas collection wells had been reconnected by October 8, 2020.

4.2.2.2 LEA Response

LEA inspection reports (see Attachment 12, pages 1-8) dated September 28, 2020, October 5, 2020, and November 30, 2020, detail observed damages, assessments, and repairs. The former owner's comments did not have any impact on LEA assessments of the damages from the Glass Fire. The former owners/operators fully cooperated with LEA staff during the investigations following the fire. The resulting repairs to damages from the fire resulted in an overall substantial improvement to the facilities infrastructure, including but not limited to landfill gas collection, leachate collection systems, and site access. The LEA can further confirm that the refuse (i.e., buried waste) within the landfill did not burn during the wildfire because it was properly covered with clean soil.

The LEA is not aware of efforts of the company to obscure facts about the burning of the landfill. The Governor's Office of Emergency Services was notified of the Glass Fire impacts and resulting methane releases and can be viewed here.

4.2.3 CFL Complaint 3: Per- and Polyfluoroalkyl Substances (PFAS)

Complaints allege that a neighbor who lived directly below the landfill was unable to use his water supply well and his animals died due to high levels of PFAS in the creek on the property downgradient of the landfill.

4.2.3.1 Regional Water Board Response

Regional Water Board staff discussed the allegations with the downgradient property owner, Dennis Kelly, in 2020. At that time, Dennis Kelly stated there was a well on the property that had not been used since the 1980s due to high temperature and metals concentrations. Regional Water Board staff recently verified this with the current owner during a phone call on November 7, 2024. Dennis Kelly stated that he did not use the creek water for drinking water or irrigation because he suspected it was contaminated from the upgradient landfill.

In March 2019, the State Water Board issued Water Code Section 13267 Order for the Determination of the Presence of Per- and Polyfluoroalkyl Substances (Order No. WQ-2019-0006-DWQ), which required Clover Flat Landfill to submit a work plan for a one-time leachate and groundwater assessment of PFAS impacts at the facility. Clover Flat Landfill submitted its findings in a report dated May 8, 2020, confirming the presence of PFAS in both leachate and groundwater. Surface water sampling was not performed at that time, but based on the findings provided by Clover Flat Landfill, Regional Water Board staff understand that a private group of citizens sampled for PFAS in the creek behind Dennis Kelly's property several times in 2019 and 2021. Since PFAS were detected in the samples analyzed, the group requested the Regional Water Board collect samples as well. In January 2023, Regional Water Board staff co-collected three surface water samples with Waste Connections staff and their consultant. PFAS

were detected in all the samples collected. See Attachment 16, which includes a summary of PFAS results and sample location maps.

In February 2024, Regional Water Board staff requested that Waste Connections collect additional onsite surface water samples for PFAS analysis. While PFAS constituents were detected by Waste Connections from the intermittent creek, the concentrations were slightly lower than those detected from the same creek downgradient on the Kelly property in January 2023. Waste Connection's sampling results also showed the presence of PFAS constituents in the upper reach of the creek (upgradient of the landfill), indicating that there may be an upgradient offsite source as well. See Attachment 16, which includes a summary of PFAS results and sample location maps.

Regional Water Board staff will continue to work with Waste Connections to address PFAS contamination in groundwater and surface water both onsite and offsite.

4.2.4 CFL Complaint 4: Leachate and Containment During Wet Weather

Complainants requested inspection reports for the large storm events that took place in October 2021 and December 2022 to January 2023, and asked if leachate was contained onsite or hauled to the POTW.

4.2.4.1 Regional Water Board Response

Regional Water Board staff responded to the request on February 23, 2023, and informed the complainants that Regional Water Board staff inspected Clover Flat Landfill ahead of the October 2021 storm to ensure wet weather readiness, and also in January 2023 after the atmospheric rivers impacted the State. Regional Water Board staff provided a link to all the requested inspection reports (and photos). All of the inspection reports can also be found in the online California Integrated Water Quality System (CIWQS) here.

4.2.4.2 LEA Response

The LEA responded to the request on January 23, 2023, stating an inspection conducted on October 19, 2021, noted the site was "well prepared for upcoming rain," and another inspection conducted on November 15, 2021, noted "[t]he inspection was conducted days after two significant rain events occurred in the area. Leachate was being properly removed by the implemented system for leachate removal. No leachate runoff was observed during the inspection." See Attachment 12, pages 9-12. Leachate was appropriately pumped into holding tanks for offsite removal to the POTW.

4.2.5 CFL Complaint 5: Leachate Discharge at the Landfill

Complaints claim that an unknown amount of leachate was discharged to the environment over two days in October 2021 instead of being pumped to a holding tank.

4.2.5.1 Regional Water Board Response

Regional Water Board staff received an email on February 10, 2023, with attached photographs to support the complaint stated above. Staff responded to the email on February 23, 2023, after speaking with Clover Flat Landfill staff, explaining that the alleged leachate release was actually a collection of low pH water (a combination of groundwater and stormwater) that was midway up the slope and being pumped into a holding tank so it would not reach the creek. The date of the event was October 30, 2021, after a large atmospheric river event.

4.2.5.2 LEA Response

LEA staff was also notified of the incident in question and concurs with the Regional Water Board's summary and findings.

4.2.6 CFL Complaint 6: Radioactive Waste at the Landfill

Complaints allege radioactive waste was trucked from the former Mare Island Naval Shipyard in Vallejo to Clover Flat Landfill, and that the California Department of Fish and Wildlife (CDFW) informed residents that radioactivity was detected in the drainage leaving the landfill. The Regional Water Board received emails on January 11, 2024, and August 6, 2024, containing a video of a downstream resident alleging nuclear waste from the former Mare Island Naval Shipyard was disposed at Clover Flat Landfill for years by the truckload in the middle of the night.

4.2.6.1 Regional Water Board Response

Regional Water Board staff contacted CDFW about the allegations. During follow up calls, CDFW staff indicated it had no records of such a conversation with the resident, nor was there any testing performed for radionuclides in the drainage leaving the landfill or the downstream creek. There is no evidence to substantiate the claims.

PROJECT NUMBER	APPROVED BY	CHECKED BY	DRAWN BY	DESIGNED BY
631224608	CMR	JI	CMR	CMR

OFFICE	DATE
Sacramento, CA	3/10/17

SCALE
0 200 400FEET

N

EAST
VINEYARD
MW-3A
TRIBUTARY
MW-3
WASTEWATER POND SAMPLE POINT
P-1
AREA 4: WASTEWATER POND AND SURROUND, 84,661 FT2
BALE
GROUNDWATER SUMP (DISCHARGE TO TRIBUTARY)
COMPOST RUNOFF SUMP (DISCHARGE TO WASTEWATER POND)
AREA 6: RETENTION BASIN AND SURROUND, 23,326 FT2
MW-5
MW-6
CONTACT WATER CONCRETE DITCH SLOPE
S-2
RETENTION BASIN SUMP (DISCHARGE TO TRIBUTARY)
STORMWATER CULVERTS (TYP.)
ENTRANCE ROAD
SLOUGH
18"" CORRUGATED HDPE PIPE CULVERT
1% (MIN)
0.5% (MIN)
AREA 3B: AREA NOT COVERED, 51,340 FT2
AREA 7: NEW FACILITIES, 35,958 FT2
PROPOSED CNG FUELING STATION
PROPOSED BLENDING BARN
TRUCK WASH (E)
MRF (E)
VEHICLE MAINTENANCE (E)
ADMIN BUILDING (E)
AREA 2: ACCESS ROAD, 38,828 FT2
AREA 3A: PILES (COVERED IN WINTER), 138,473 FT2
AREA 1A: NORTHWEST STORAGE, 35,337 FT2
AREA 1: SOUTHWEST STORAGE, 41,198 FT2
AREA 5: SOUTHEAST STORAGE, 138,882 FT2
MW-2
S-1
SW-2
SW-1
MW-4
WATER SUPPLY WELL
FIRE PROTECTION STORAGE TANK
WATER SUPPLY WELL
ZONE A FLOODPLAIN LIMITS
TRIBUTARY
WEST
VINEYARD
VINEYARD
SLOUGH
DITCH SLOPE 0.5% (MIN)
1% (MIN)
180
175
170
165

LEGEND:

WATER SUPPLY WELL	UVDS WELL
GROUNDWATER MONITORING WELL	MW-1
SURFACE WATER MONITORING POINT	S/SW-1
POND SAMPLING POINT	P-1
CLEAN WATER SUMP	
COMPOST RUNOFF SUMP	
STORMWATER INLET	
CLEAN STORMWATER PIPING	
COMPOST SUMP PIPING	
GROUNDWATER SUMP PIPING	
RUNOFF CULVERT PIPING	
WET-SEASON TARP PIPING	
PROPERTY BOUNDARY	
PERMITTED FACILITY	

NOTES:
1. TOPOGRAPHY SHOWN IS APPROXIMATE.
2. DRAINAGE PATHS ARE APPROXIMATE.
3. WORKING SURFACES MAINTAINED AT MINIMUM 1% SLOPE BUT MAY BE STEEPER DEPENDENT ON MAINTENANCE ACTIONS.
4. DRAINAGE DITCHES MAINTAINED AT A MINIMUM 0.5% SLOPE.
5. AREA 1, 3A TARPS/PIPES INSTALLED IN WET SEASON (DECEMBER 1 TO APRIL 1.) NUMBER VARIES DEPENDENT ON SITE REQUIREMENTS.
6. WET SEASON AREA 1 PIPING TIES INTO AREA 3A PILE TARPS. WET SEASON AREA 3A PIPING DISCHARGES TO RETENTION BASIN.
7. DRY SEASON AREA 3 DRAINS WITHOUT TARPS OR PIPES TO CATCHMENT AS SHOWN.
8. CATCHMENT WILL BE CONCRETE-LINED DURIN FUTURE SITE UPGRADE.
9. WATER SUPPLY WELL FOR NON-POTABLE USE.

APTIM

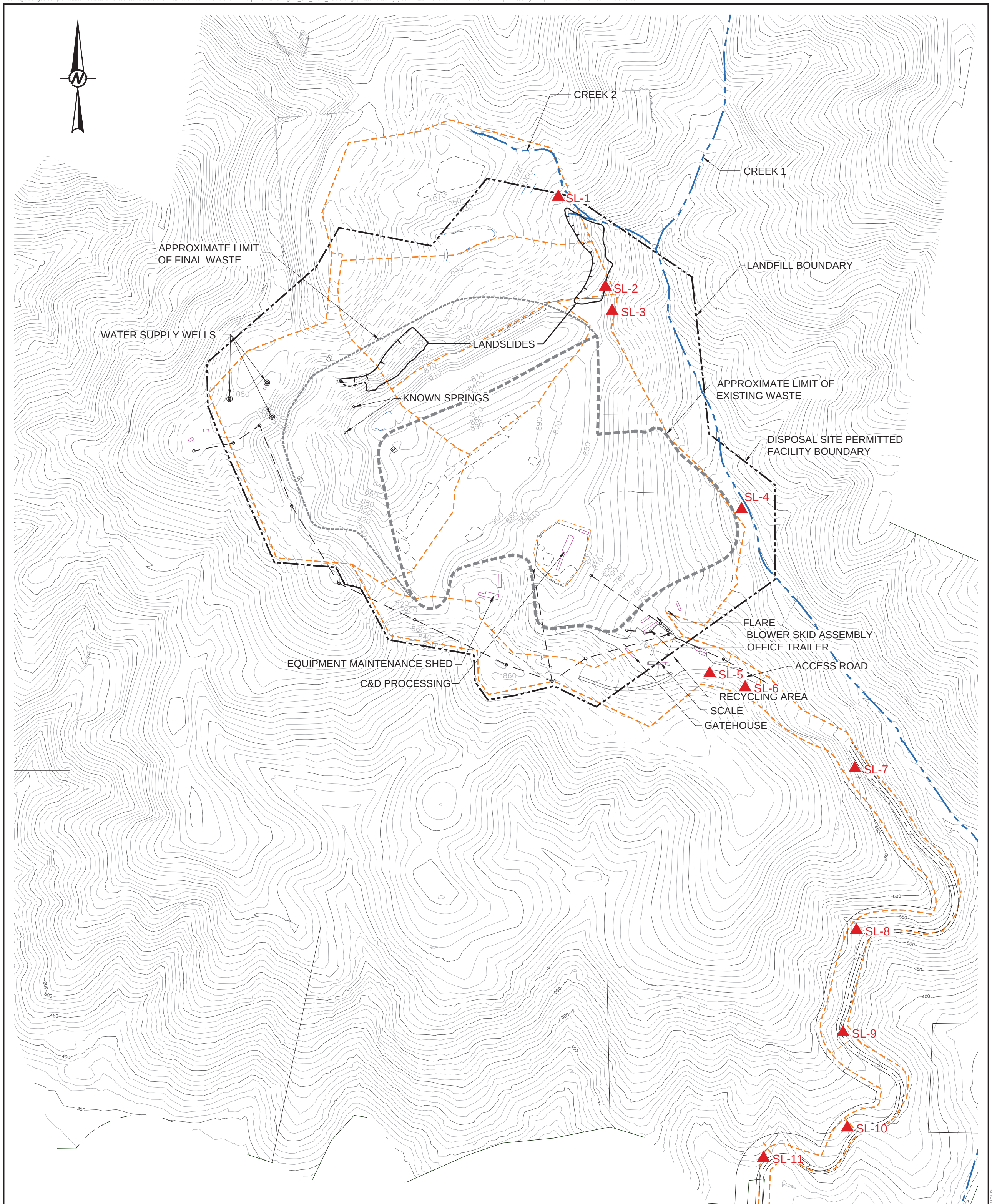
UPPER VALLEY DISPOSAL SERVICE
UPPER VALLEY COMPOSTING FACILITY
NAPA COUNTY, CALIFORNIA

FIGURE 2

SITE PLAN

UPPER VALLEY RECYCLING FACILITY
1285 WHITEHALL LANE, SAINT HELENA, CALIFORNIA

File: C:\Users\Christopher.Richgels\Documents\UVDS\Technical Report-2018\DWGS\Figure 2 Site Plan.dwg
Plot Date/Time: Oct 03, 2018 - 12:32pm



LEGEND

SL ▲ Surface-water monitoring location

Drainage Boundary

Existing Permit Landfill Boundary

NOTE(S)

SITE TOPOGRAPHY PREPARED BY TETRA TECH GEOMATIC TECHNOLOGIES, LAFAYETTE, CALIFORNIA. DATE: 2019-07-01

0 200 400
1" = 200' FEET

CLIENT
CLOVER FLAT LANDFILL, INC.
CALISTOGA, CALIFORNIA

CONSULTANT

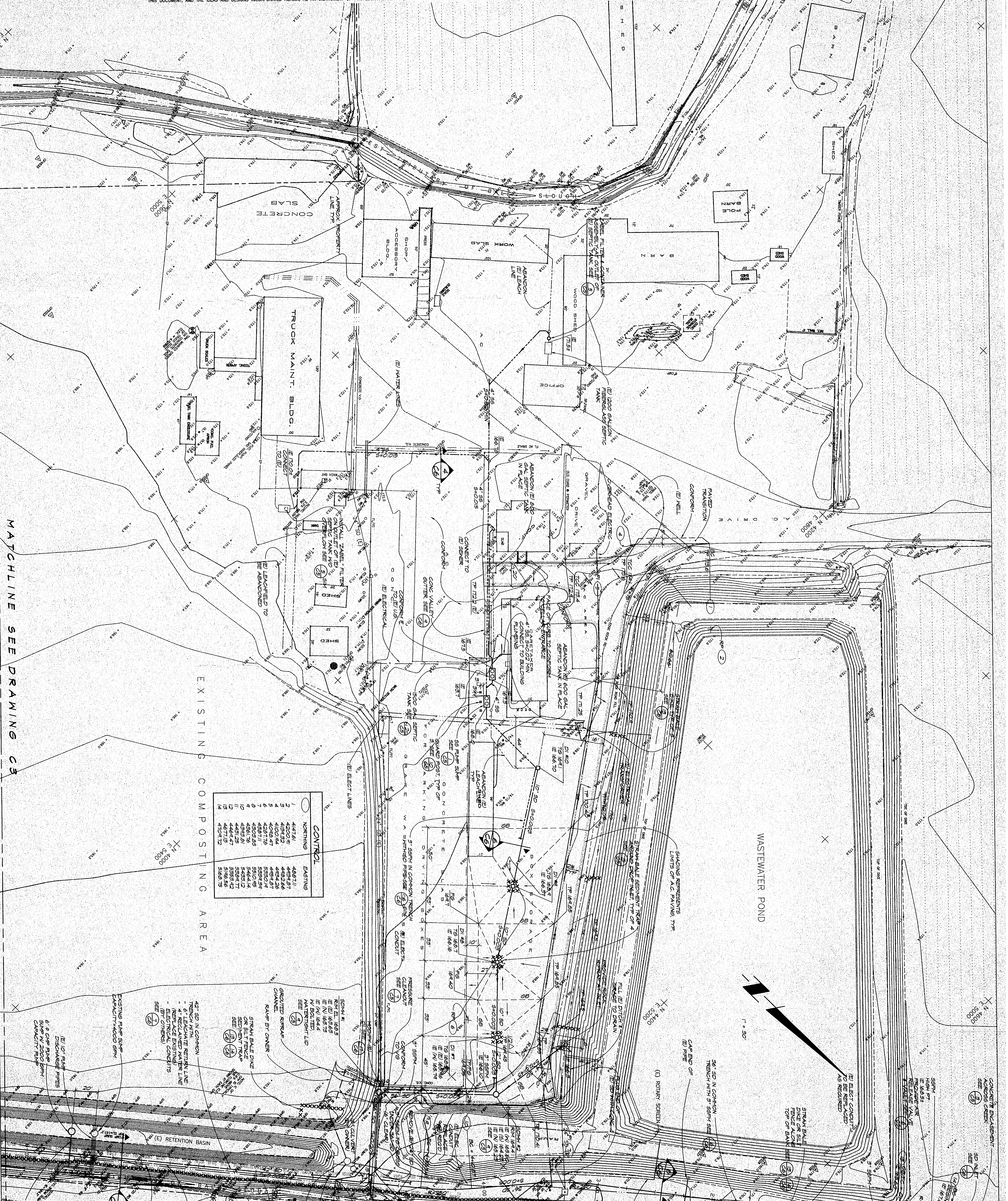
YYYY-MM-DD	2023-02-08
DESIGNED	MT
PREPARED	ADP
REVIEWED	KLJ
APPROVED	KJ

PROJECT
CLOVER FLAT LANDFILL
4380 SILVERADO TRAIL
CALISTOGA, CALIFORNIA

TITLE
SURFACE WATER MONITORING LOCATIONS

PROJECT NO. 2013854601

FIGURE 3



CONTROL	NORTHING	EASTING
1	4147.61	4887.11
2	4200.91	4934.87
3	4194.32	4982.66
4	4100.94	4934.26
5	4098.47	4959.87
6	4287.78	5330.19
7	4387.11	5384.39
8	4303.85	5510.95
9	4361.76	5464.14
10	4393.81	5435.12
11	4431.25	5384.77
12	4469.47	5353.92
13	4677.13	5196.56
14	4704.72	5168.75

DATE: 8-12-94
JOB NO: 9239
SCALE: 1" = 30'
DRAWN: EF
CHECKED: CC
SHEET: C2
9239CV07

REGISTERED PROFESSIONAL ENGINEER WILLIAM J. PHILLIPS No. 24,978 EXP. 12-31-97 CIVIL STATE OF CALIFORNIA

△ ISSUED FOR APPROVAL 8-12-94

1994 SITE IMPROVEMENTS

BUILDING AREA SITE PLAN

UPPER VALLEY DISPOSAL SERVICE
WHITEHALL LANE
NAPA COUNTY, CALIFORNIA

SUMMIT ENGINEERING, INC.
CONSULTING CIVIL ENGINEERS
1400 NORTH DUTTON AVENUE, STE. 22, SANTA ROSA, CALIFORNIA 95401-7152
PH. (707) 527-0775 FAX (707) 527-0212