

US EPA ARCHIVE DOCUMENT

November 15, 1999

Mr. Tom Davis
Yolo County Department of Planning and Public Works
292 West Beamer
Woodland, CA 95695

Dear Mr. Davis:

Thank you for submitting your Project XL proposal dated September 14, 1998 on the Yolo County bioreactor landfill. I am pleased to inform you that the Environmental Protection Agency (EPA) has reviewed your proposal and is prepared to work with you, the state of California, and appropriate stakeholders to develop a Final Project Agreement (FPA). The FPA will detail the expectations of Yolo County, EPA, the state of California, and other project partners for your bioreactor landfill project proposal. If all partners are satisfied and sign the FPA, the signed agreement will constitute acceptance as an XL project.

Project XL was established to test innovative strategies and, through this process, foster excellence and leadership in environmental protection. We believe that your proposal shows the potential to accomplish these goals. Specifically, this XL proposal offers a number of benefits among them:

- S** More rapid acceleration of waste decomposition,
- S** Expedited recovery of landfill methane for renewable energy, and
- S** Providing valuable data that can help evaluate this approach and potentially establish it as an alternative to the standard approaches for landfill operations.

In order to pursue the regulatory flexibility necessary to achieve the enhanced environmental results mentioned above, we would ask that your department address in more detail the following key project elements during development of the draft FPA.

1. Liquid Amendments: The FPA should contain more specifics regarding the exact composition of the proposed liquid amendments for the project. This includes, a rough indication of the volume of liquid amendments needed to reach field capacity, the most likely

sources for the liquid amendments, and an outline of the measurement and monitoring plan for this aspect of the project.

2. Gas Collection and Control: It is our understanding that this site will comply with all applicable Clean Air Act regulations. Although no regulatory flexibility is being sought from air requirements for this project, we believe that it may be appropriate to include specific information in the FPA on the proposed gas collection and control systems that you will employ to attain superior environmental performance. Specifically, regarding fugitive landfill gas emissions, the FPA should address this by adding a section which provides specifics on your gas collection and control plan, including how you propose to deal with failures in the gas collection and control system, how you intend to continue compliance with current air regulations, what cover materials were used to achieve near 100% collection efficiency in the test cell, and what cover materials you plan to use for the XL project. In essence, by claiming near 100% gas capture, we need information on how you plan to achieve this. In addition, we understand that your superior environmental performance is based on your test cell performance, therefore any departure from those operations should be identified for this project.

3. Lining Systems: Your XL proposal identified that a key cost saving element for the county would be obtained through regulatory flexibility from the state of California on the lining system proposed for this project (i.e. single vs. double). This issue will require additional negotiations with the State of California and other stakeholders during the project development phase and as such we cannot make any assurances regarding the State's flexibility.

I also want to mention that we have assembled a team at EPA to work with you during the development of the FPA. This team will be lead by Mark Samolis from our Region ((415) 744-2331) and Sherri Walker of the Office of Reinvention ((202) 260-4295). I know from my conversations with them that your department is committed to making this project better for all parties involved in the process. They will contact you soon to offer their support with FPA negotiations.

As I mentioned earlier, upon signing of the FPA, your proposal will become an official XL Project. To that end, if I can be of any assistance in expediting the development and review of your FPA, please do not hesitate to call.

Sincerely,

/s/

Laura Yoshii
Deputy Regional Administrator

cc: Mr. Gary Carlton, Executive Officer
Regional Water Quality Control Board 5

Mr. Scott Walker
California Integrated Waste Management Board

Mr. Thomas To, Director
Yolo County Department of Environmental Health

Mr. Larry Greene, APCO
Yolo County Air Pollution Control District