

The Pesticides/Solvents Landfill Cover

Under the direction of the U.S. Environmental Protection Agency (EPA), the Casmalia Steering Committee (CSC) has begun construction of the Pesticides/Solvents Landfill cover at the Casmalia Disposal Site.

Under the Consent Decree's Statement of Work, the CSC is required to design and construct the final cover system and supporting toe buttress for the Pesticides/Solvents Landfill. The performance standards for this cover are governed under the rules of the Resource Conservation and Recovery Act (RCRA) and this protective system is commonly referred to as a RCRA cap.

Over the past year EPA has worked closely with the California Department of Toxic Substances Control, the California Regional Water Quality Control Board and the County of Santa Barbara in reviewing the cap design plans and supporting engineering analysis which was prepared by the CSC.

Throughout the review process, EPA and the State's technical support teams had serious concerns regarding the seismic stability of the landfill and the proposed cover system and whether the landfill and the proposed cover system could withstand the maximum credible earthquake at the Casmalia site with only minimal damage.

On August 18, 1998, EPA issued conditional approval of the final cover design which was submitted by the CSC on June 30, 1998. To address these concerns, the CSC undertook additional landfill characterization investigations to obtain data on the properties of the waste within the landfill. Under the close technical review and oversight of EPA and the State, the CSC refined the engineering analysis and the final cover design to address agency concerns. On August 18, 1998, EPA issued conditional approval of the final cover design which was submitted by the CSC on June 30, 1998. EPA and the CSC divided the construction work into two parts because the 1998 summer construction season was half over.

Part 1, construction of the supporting toe buttress, began mid-September 1998 and will be completed before the start of the 1998/99 rainy season. Part 2, construction of the RCRA cap, will start after the end of the 1998/99 rainy season, sometime in March or April 1999 and will be completed before the summer of 1999. Construction of the toe buttress is being monitored by EPA's on-site representative and, as requested, by representatives of the California Department of Toxic Substances Control and the California Regional Water Quality Control Board. The same level of agency oversight will occur during construction of the RCRA cap.



Casmalia Disposal construction site

Winterization Activities for the Upcoming 1998/99 Winter Season

EPA has been working with the CSC to prepare the site for the upcoming storm season. The CSC has repaired erosion damage that occurred during the past 1997/98 storm season. The CSC is also planning on paving additional areas of the site to enhance site access during the winter months. EPA is currently working with the California Department of Toxic Substances Control and the California Regional Water Quality Control Board to determine what additional preventative measures need to be taken for the 1998/99 winter season.

CSC Storm Water Discharge Permit Application

As part of future storm water planning, EPA has directed the CSC to apply for a storm water discharge permit under the authority of the National Pollution Discharge Elimination System (the federal water quality standards program commonly called NPDES). This particular NPDES permit is managed by the State of California Regional Water Quality Control Board. The purpose of the NPDES permit is to have an established means of discharging storm water from the site should that become necessary. Both EPA and the State of California plan to use this permit only in emergency situations. Both agencies intend to maximize on-site water usage to limit emergency situations.

Other Site Work

The CSC made a number of improvements in its operations which increased the volume of liquids extracted and treated. One of the key improvements was to add a pump to PSCT#4 which allows pumping and treating at a rate of 2,000,000 gallons per year. In addition, the gallery well is extracting and treating Non-aqueous Phased Liquid (NAPL). The CSC also added five incremental groundwater monitoring wells and reconditioned an additional 12 wells. In total, the CSC is currently operating a sampling program which includes 258 monitoring wells.

Summary of Work Phases

PHASE 1
Continued and improved collection, treatment & disposal of contaminated liquids.

Design and construction of Pesticides/Solvents landfill cap and buttress.

Design of other landfill caps and buttresses.

Additional investigation and evaluation of Site characteristics to enable EPA to make appropriate response action decisions, including final Site remedy selection.

Design of facilities associated with response actions selected by EPA.

Site maintenance, groundwater monitoring, community/public information support.

\$50,000 technical assistance grant for use by the community.

PHASE 2
Construction of other landfill caps and buttresses.

Construction of facilities associated with response actions selected by the EPA.

Continued site maintenance, groundwater monitoring, community/public information support.

Five years of operation and maintenance of facilities.

PHASE 3
Thirty years of continued operation and maintenance of the facilities.

PHASE 4
Continued operation and maintenance of facilities beyond Phase 3.

Debris Dumping in Casmalia Creek

In response to information that fill material had been dumped into Casmalia Creek, EPA issued an order to Roy Bognuda and Kenneth Hunter, Jr., under section 404 of the Clean Water Act. Casmalia Creek is located immediately outside of the Casmalia Disposal Site.

EPA is evaluating what additional steps, if any, should be taken in response to this situation. EPA hopes to bring this matter to conclusion within the next few months.

EPA's enforcement action regarding the discharge of fill material is completely unrelated to the work at the site performed by the CSC under the Consent Decree.

EPA Initiates Settlement Process with Additional Responsible Parties

EPA has initiated the settlement process with additional responsible parties to collect monies to pay for site work beyond Phase I. The CSC has already committed itself to paying for site work in Phase I. This settlement effort is a critical step toward obtaining the financial resources to continue site work. Substantial resources will be needed from additional responsible parties to cap the other landfills and to construct other portions of the remedy in Phase II.

As part of the settlement effort, EPA will be contacting thousands of waste generators that contributed waste to the Casmalia Disposal Site to notify them of their potential liability under Federal environmental laws. EPA sent general notice letters to approximately 750 parties on October 14, 1998. Early in 1999, EPA will offer these 750 waste generators an opportunity to enter into settlements to substantially resolve their environmental liabilities at the Site. This settlement will require the parties to pay their fair share of the cost of site work.

In addition, EPA is continuing to vigorously prosecute its cost recovery case in federal district court against Casmalia Resources, Casmalia Disposal, and Kenneth H. Hunter, Jr., the facility's owner/operators. The discovery process is likely to start in fall 1998. EPA is cooperating with the CSC in bringing suit against the owner/operators.

EPA is also planning to re-initiate settlement negotiations with the State of California as soon as the cost estimate for site work is completed this fall.

Removal of the Casmalia Neutralization System

In November 1997, the CSC dismantled and disposed of the Casmalia Neutralization System (CNS) at the site. The CNS was originally designed and installed by Casmalia Resources as a liquid waste treatment system for acidic, alkaline and heavy metal contaminated liquid wastes.

CNS demolition and disposal activities included the removal of waste treatment and storage tanks, piping, pumps and other ancillary equipment, and the treatment system control room and trailer. The CSC removed 11 tanks, approximately 15,000 gallons of hazardous sludges, 200 cubic yards of hazardous contaminated debris and 120 cubic yards of other demolition debris from the CNS.

All material removed from the CNS was sent off-site to a facility which is licensed for disposal of this kind of waste.

How the Site Withstood the Last El Nino Storm Season

Prior to the start of the 1997/98 El Nino storm season, EPA worked with the CSC, the California Department of Toxic Substances Control, the California Regional Water Quality Control Board and the County of Santa Barbara to prepare the site. Site preparation work included repairing eroded areas, regrading areas to minimize rain water infiltration, reseeding areas to minimize further erosion, and paving and re-grading site access roads.

During the 1997/98 rainy season, the site received over 32 inches of rain. Average annual rainfall at the site is approximately 13 inches. As a result of preventative efforts undertaken during the previous summer, water levels in the on-site storm water ponds were low enough to contain the more than 200 million gallons of rainwater that fell on the 252-acre site.

Some new erosion damage did occur at the site, including damage to some of the site's storm water diversion channels. This allowed large quantities of storm water runoff from the surrounding hillsides to collect on-site and add to the water collected in the on-site storm water ponds. Despite the heavy rains, no contamination escaped the boundaries of the site.

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If you did not receive this notice in the mail and would like to receive future mailings about the Casmalia Disposal Site, please complete the coupon below and return to:

David Cooper, *Community Involvement Coordinator*
U.S. Environmental Protection Agency, Region 9
75 Hawthorne Street (SFD-3)
San Francisco, CA 94105.

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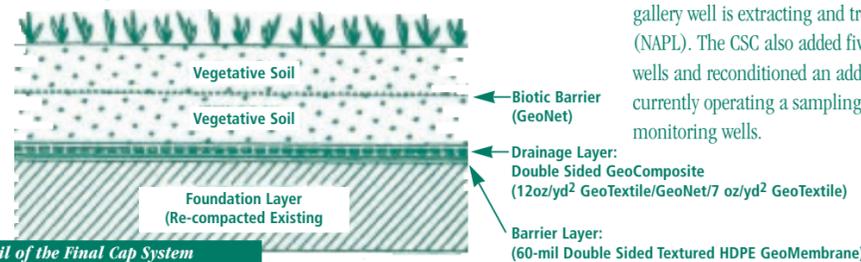
OPTIONAL INFORMATION

Phone: _____

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Detail of the Final Cap System

For more information please contact:

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