

CHRONOLOGY
BERRY STREET MALL LANDFILL
1946 - June 1992

- 1946 Landfill operation start-up.
- 1952 Facility operated by William O. Finger.
- 18 Sept. 1964 Policy for the prevention & control of ground water pollution with respect to the disposal of refuse to land (Resolution No. 64-165).
- 14 March 1969 Policy for the control of water quality with respect to solid waste disposal (Resolution No. 69-216).
- 23 July 1971 Waste Discharge Requirements for Finger's Dump (Order No. 72-17) with monitoring required.
- 30 October 1975 Board letter to Discharger stating quarterly Monitoring Reports for January - September were not submitted.
- 2 March 1976 Board letter to Discharger - as above - no Monitoring Reports received from January 1975 - January 1976.
- 15 March 1976 Internal memo from F. McDermott to W. S. Johnson indicated Finger did not have copy of WDRs and, consequently, did not know what monitoring requirements were. F. McDermott informed Finger to correct the problem.
- 24 August 1976 Board letter to Discharger - indicated Monitoring Reports for April 1976 - August 1976 had not been received.
- 10 September 1976 Monitoring Report for January 1976 - April 1976 received.
- 28 December 1976 Board letter to Discharger requesting him to submit Monitoring Reports as requested in 24 August 1976 letter. Never acknowledged.
- 12 March 1980 Solid Waste Disposal Site Inspection Report prepared by Geo. M. Rose, Sanitarian for Placer Co. Health Department - indicated site was in violation of its permit to operate.
- 17 June 1980 RCRA Inspection Report of Dump prepared by SWMB - indicated non-compliance with Disease Safety/Fire, and Safety/Access criteria and indeterminate compliance with surface and ground water criteria.
- 11 August 1980 Board certified letter to Discharger indicating violation and threatened violation of five WDR specifications based on inspection of 6 August 1980. Also noted that no waste should be discharged into new pit until it was demonstrated that ground water would be adequately protected beneath the pit.

- 12 August 1980 Memo from Jim Parsons to files indicating potential ground water threat caused by dumping of Group 2 wastes in large, excavated pit immediately west of the main landfill. Recommended possible mitigation measures.
- 23 September 1980 Memo from Jim Parsons to Jim Pappas giving an update on landfill mitigation measures being followed. Pit now being filled with trash.
- 26 September 1980 Letter from SWMB to Discharger re-evaluating 17 June 1980 inspection letter to the effect that the landfill was determined not to be in compliance with the RCRA surface water criterion.
- 9 October 1980 Board letter to Discharger re-requesting submission of a Report of Waste Discharge. Included memo of inspection conducted on 11 September 1980 to evaluate ways to address concerns specified in 11 August 1980 letter.
- 19 February 1981 Memo from Tom Vandenberg to Jim Pappas indicating landfill operational deficiencies and status of corrective measures recommended. Concluded very little had actually been accomplished according to his review of the correspondence to date.
- 11 March 1981 Memo from Tom Vandenberg to Jack Del Conte regarding results of inspection made on 20 February 1981. Concluded leachate pond system was not operational and large pit had leachate flowing into it and collecting. Discharger indicated he would correct this problem immediately.
- 28 May 1981 Board letter to Discharger requesting him to address ground water issues, leachate controls, monitoring wells, and excavation pit mitigation measures before WDRs could be revised. Included two memos, both dated 26 May 1981, regarding inspection made on 18 March 1981 and an evaluation of consulting engineers December 1980 Landfill Engineering Report. Noted problems which needed to be addressed in both areas.
- 22 October 1981 Board certified letter to Discharger requesting he address issues indicated in attached inspection memo of 22 October 1981 by 22 November 1981 in a written report prepared by a California Registered Civil Engineer. Also requested him to include in the report a description of corrective measures taken and/or proposal of an implementation time schedule.
- 3 December 1981 Consulting engineers letter to Board which addressed concerns specified in 22 October 1981 memo and letter. Time implementation schedule was not included. Concluded report was inadequate.

- 15 January 1981 Inspection memo from Tom Vandenberg to Jack Del Conte concerning results of inspection conducted on 6 January 1981. Observed a large flow of leachate from the main landfill into the excavation pit, which now formed a pond. Concluded some of the concerns previously specified had been properly addressed and that the potential for ground water pollution was significant.
- 29 January 1982 C&A adopted, ordering Discharger to:
1. Cease depositing waste in pit west of landfill
 2. Remove & dispose of wastes in the pit
 3. Comply with WDRs #72-17
 4. Comply with monitoring schedule for ground water and provide monthly monitoring reports
 5. Provide a written report by 1 March 1982 explaining corrective actions taken & schedule for additional work.
- 23 February 1982 Consulting engineer's letter to Board requesting extension of 1 March 1982 date for Report (item #5 of C&A).
- 26 February 1982 Board letter to Discharger denying request.
- 3 March 1982 Consulting Engineers letter to Board complying with item #5 in C&A.
- 27 May 1982 Consulting engineers letter to Board proposing excavation of new pit, transferring waste, lining old pit, pumping out & expanding leachate pond.
- 8 June 1982 Board letter to Discharger accepting 27 May proposal.
- 21 September 1982 Board letter to Discharger tentatively accepting as complete the lining of the waste pit.
- 16 February 1983 Inspection Report of 3 February 1983 inspection noting leachate flowing at 30 gpm from several places in the landfill.
- 18 February 1983 Consulting engineers letter to Board evaluating two alternatives for control of leachate.
- 15 April 1983 Board letter to discharger accepting proposed leachate control, and suggesting rescision of C&A if leachate control is successful.
- 16 September 1983 Board letter to Discharger allowing disposal of waste into pit #2.
- 16 September 1983 through 1 March 1985: No correspondence.

- 1 March 1985 Board letter to Discharger requesting submittal of a Ground Water Monitoring Plan, per Subchapter 15 requirements, by 26 May 1985.
- 15 March 1985 Board letter to Discharger requesting submittal of Report of Waste Discharge for reclassification of Waste Management Unit under Subchapter 15. RWD due 29 March 1985.
- 24 July 1985 Board letter to Discharger; 2nd request for Ground Water Monitoring Plan by 23 August 1985. Also, Closure Plan due 90 days prior to closure, not 16 August 1985 as stated in previous letter from Board. (Previous letter not in file).
- 23 August 1985 Consulting engineers letter to Board proposing addition of an upgradient well and use of two existing wells for ground water monitoring. (Gives construction information on existing wells.) Proposes ground water monitoring twice yearly for BOD, COD, and TDS.
- 6 September 1985 Board letters to Discharger requesting ground water flow information and requiring quarterly ground water monitoring for COD, BOD, EC, Nitrates, chlorides, EPA 624 & 625, ICAP metals scan. Requests information by 27 September 1985.
- 18 October 1985 Board letter to Discharger requesting previous information by 1 November 1985. Also requests monitoring information for past 8 years, required by Order 72-17.
- 15 November 1985 Board letter to Discharger removing requirement for an upgradient well, pending notification of City of Roseville to monitor their Burn Dump.
- 28 March 1986 Inspection report of 20 March inspection noting leachate seepage, violating item A.6 of Board Order 72-17. Accompanying letter to Discharger requests Closure & Post Closure Monitoring Plan per Subchapter 15 be submitted 90 days prior to closure. No closure date set.
- 26 June 1987 Inspection Report noting ground water monitoring wells have collapsed; landfill is near capacity, no closure plan submitted.
- 25 August 1987 Board letter to Discharger requesting submittal of following documents by 1 December 1987, pursuant to Section 13267 of Water code:
1. Report of Waste Discharge
 2. Closure and Post Closure Monitoring Plan
 3. A report detailing how water quality monitoring objectives will be met, with schedule for compliance
- Also due:
1. SWAT Proposal: 1 January 1988
 2. SWAT Report: 1 July 1989

- November 1987 Facility ceases acceptance of waste.
- 13 January 1988 Board letter to Discharger changing due date for SWAT proposal to 1 April 1988. Also: Report of Waste Discharge for Closure & Post Closure Monitoring Plan Technical Report (Ground Water Monitoring Plan) were due 1 December 1987. Discharger informed violation of Section 13267 of Water code has occurred and civil penalties up to \$1,000/day may be incurred. Schedule for submittal of these documents is due 1 February 1988.
- 28 January 1988 Inspection Report of 20 January 1988 inspection noting need of cover, grading and drainage. Previously requested documents are past due. Violation of item A.6 of Board Order 72-17 noted. Some leachate noted. Finger informed pond may have to be permitted if it is used long term.
- 3 February 1988 Consulting engineer letter to Board requesting meeting to discuss schedule for submission of documents.
- 1 March 1988 Memo to file RE: meeting of 25 February 1988 between Finger, Reg. Board staff, consulting engineer & geologist. Discussion of SWAT & Subchapter 15 document requirements and submittal of schedule for compliance. Schedule for final cover would be based on ground water monitoring results. Winterization grading & cover needed. Holding pond discussed.
- 2 March 1988 Consulting engineer letter to Board providing following schedule for submittal of document:
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|----------------|--------------------------------|
| RWD: | 1 May 1988 |
| Closure Plan: | 1 June 1988 |
| SWAT Proposal: | 1 April 1988 |
| SWAT Report: | 1 July 1989 |
| G. W. Plan: | Immed. following SWAT approval |
- 22 March 1988 Board letter to Discharger accepting proposed schedule. Clarification was requested regarding the timing and extent of grading, cover, and drainage work proposed for coming summer, and schedule for installation of monitoring wells. The above information was to be submitted by 18 April 1988. Monitoring wells were to be installed "before summer" 1988; grading and drainage work to be completed "by early autumn, prior to rainy season".
- 11 April 1988 SWAT Proposal Received.
- 29 April 1988 Consulting engineers letter to Board giving status of RWD Application and \$500 of \$2000 filing fee with letter from discharger explaining that \$500 would be sent every month. No technical information submitted with RWD.

- 1 June 1988 Consulting engineers letter to Board requesting extension of 30 days for submittal of Closure Plan.
- 30 June 1988 Board letter to Discharger providing comments on SWAT proposal. Revised proposal requested by 1 August 1988.
- 11 July 1988 Board letter to Discharger indicating Discharger's failure to meet schedule proposed in 2 March 1988 letter to Board. RWD & Closure Plan requested by 1 August 1988.
- 14 July 1988 Board letter to Discharger transmitting memo to L. Nash of 12 July 1988 RE: meeting with Discharger, consultants, and Placer County Health officials on 12 July. Discharger was informed at meeting of 11 July 1988 letter from Board. Discharger had retained new Consulting Engineer.
1. Consulting engineer requested extension of due date for submittal of RWD & Closure Plan
 2. Board informed consulting engineer to put proposal in writing
 3. Board prioritized its concerns:
 - a. Winterization of landfill. 12 inch cover required by CWMB was acceptable for winterization
 - b. Installation of g.w. monitoring facilities
 - c. Submittal of RWD
 - d. Address fate of leachate holding pond.
- 14 July 1988 CWMB issues a C&A (88-3) for landfill violations, to be completed by 1 October 1988. Violations include lack of cover material.
- 23 July 1988 Final \$500 filing fee payment for RWD received by Board.
- 5 August 1988 Consulting engineer's letter to Board proposing submittal of RWD and schedule for submittal of Closure and Post-Closure Maintenance Plan by 1 October 1988.
- 10 August 1988 Revised SWAT Proposal received by Board.
- 12 September 1988 Board letter to Discharger tentatively accepting SWAT proposal, subject to addressing enclosed comments.
- 26 September 1988 Consulting engineers letter to Board submitting Drainage Improvement Plan for landfill.
- * 31 October 1988 CWMB refers Discharger to Attorney General for violation of C&A.

- 1 November 1988 Telephone conversation with consulting engineer. Engineer has been instructed by Discharger to stop work on all engineering work. Winterization has not been completed. A complete RWD has not been submitted and Schedule for Closure Plan has not been submitted.
- 3 November 1988 Telephone conversation with consulting geologist for SWAT and ground water monitoring work. Geologist has been instructed by Discharger to cease work.
- 28 November 1988 Board inspection of landfill noting violation of submittal of technical documents and lack of cover, grading, and drainage at landfill.
- 14 December 1988 Inspection report reflects minor activity by the Discharger. All engineering work has ceased.
- 21 April 1989 Draft closure WDR sent to Discharger for comments.
- 19 May 1989 Tentative WDRs distributed for review.
- 6 June 1989 Letter from the Discharger citing lack of financial resources as reason for noncompliance and no comment to 21 April 1989 letter.
- 9 June 1989 IWMB letters RE: ongoing violations.
- 23 June 1989 After unsuccessful attempts by Board staff to secure a completed RWD, the Board adopted closure requirements WDR Order No. 89-115.
- 3 August 1989 Issue of site ownership addressed to Mrs. Delana Finger.
- 17 February 1990 Letter to engineering firm informing them of Chapter 15 requirements and status of the site relative to closure.
- 9 March 1990 IWMB letter RE: site inspection and informing Discharger of Title 14 closure requirements.
- 10 December 1990 Summary of Board staff inspection conducted 24 October 1990. Discharger has not complied with WDR 89-115.

- 24 June 1991 IWMB issues a Corrective Action Order (91-01) which requires the Discharger to:
1. Take corrective action
 2. Prepare & implement a Closure Plan and Post Closure Maintenance Plan
 3. Commence 1 & 2 by 1 August 1991, permanently extinguish the fire by 1 September 1991, submit approved Closure/Post Closure Maintenance Plans by 1 October 1991: activities in the Closure Plan completed by 1 January 1992 and activities in the Post Closure Maintenance Plan must commence upon completion of the Closure Plan and in accordance with time schedules included in the plan.
- 18 July 1991 Response from Discharger RE: IWMB enforcement action. No resources (funds). He does not offer any alternative.
- 13 August 1991 IWMB letter responding to 18 July Discharger comments. Discharger must comply with their enforcement order.
- 26 August 1991 IWMB letter to Discharger requesting completion of the form requesting "Alternative Certification" for the Facility.
- 11 October 1991 IWMB letter to Discharger informing him of the implementation of the necessary corrective actions described in their Corrective Action Order No. 91-01 including the following:
1. Assessing site to further evaluate the nature and extent of conditions requiring corrective actions
 2. Contracting for engineering and construction services to extinguish the fire, and
 3. Contracting for preparation and implementation of Closure and Post Closure Maintenance Plans.
- 20 November 1991 IWMB adopts Notice and Order No. 91-01 for failure to maintain adequate site security, allowing public access to areas where dangerous conditions exist, and receiving unacceptable materials as cover inconsistent with requirements of orders requiring closure of the site.
- 27 November 1991 IWMB letter RE: ongoing violations.
- 7 May 1992 Discharger's Legal Counsel's letter to the SWRCB RE: Annual Fee Assessment. States that IWMB should be the billed party.
- 12 May 1992 Received Preliminary Closure Plan from IWMB.
- 15 May 1992 Received Preliminary Post-Closure Maintenance Plan from IWMB.

BERRY STREET MALL, INC.

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28 May 1992 Board staff comments to IWMB RE: Closure/Post Closure Maintenance Plan.

2 June 1992 Memo from IWMB to RWQCB RE: Annual Fee - IWMB finding that the Discharger still has financial responsibility for payment of Fee.

9 June 1992 Reviewed Negative Declaration documentation and submitted comments to the State clearing house.

19 June 1992 IWMB submits final Closure/Post Closure Plans.

23 June 1992 RWQCB letter approves Closure/Post Closure Plans.