



Ahtna Global, LLC
2255 Contra Costa Blvd. Suite 312
Pleasant Hill, CA 94523
Phone: (925) 222-6593

Technical Memorandum

Date: December 21, 2023
To: Project File (Project No. 21044.006.01.000)
From: Sommer Carter/Ahtna Program Manager
Subject: **Technical Memorandum – Site Maintenance Work Plan, Former USDB, Lompoc, California**

Introduction

Ahtna Global LLC (Ahtna) has prepared this Technical Memorandum for the United States Army Corps of Engineers (USACE) under Contract No. W912PL18D0044, Order No. W912PL21F0041. The memorandum presents the plans and methods for general site maintenance activities associated with the Wood Dump, Former Army Landfill (FAL), and Washrack sites at the Former U.S. Disciplinary Barracks (USDB) located in Lompoc, California (Figure 1). Site maintenance is to be performed as a preemptive measure under the environmental long-term monitoring program for the Site.

Background

General site maintenance activities are based primarily from observations and recommendations documented in previous groundwater monitoring reports and the 2022 Annual Inspection Report (Ahtna, 2023a). The Appendices from the Annual Inspection report which documents site conditions and the Santa Barbara County Environmental Health Services (SBCEHS) Site Inspection Reports and Bureau of Prisons (BOP) quarterly reports are included in Attachment 1.

Wood Dump Site

Based on the annual inspection conducted by Ahtna and reviews of the inspections conducted by the SBCEHS and BOP the Wood Dump Site is overall in good condition. As documented in the 2022 Annual Inspection Report (Attachment 1), the cover of the Wood Dump is well maintained and vegetated with no signs of erosion or refuse at the cover surface (Photos 1–6). Erosion control lined ditches are in good condition, with a smooth grade maintained throughout (Photos 9, 10, 18). However, following a heavy rain event in January 2023, the BOP reported minor erosion on the north side of the Wood Dump (Attachment 2). No impact to the integrity of the soil cover or slope stability was observed. This work plan describes proactive maintenance activities to ensure continued slope stability.

Former Army Landfill

The former Army Landfill is inspected quarterly by the BOP and semiannually by the SBCEHS, as documented in the 2022 Annual Inspection Report (Ahtna, 2023a). The BOP inspections report the perimeter fencing is intact, no signs of animal burrows near the fence line, rodent control measures in place, periodical mowing, and no observed notable quantities of refuse at the FAL surface. The SBCEHS noted exposed debris at the surface of the FAL during its 2022 inspections and stated that vegetative maintenance should be performed in its August 2022 inspection report. The Central Coast Water Board deferred evaluation of landfill cover integrity to the SBCEHS, and supported recommendations regarding maintenance, as outlined in the regulator comments (Appendix E of Attachment 1). In response, landfill cap repairs and rodent control measures described in this work plan will be performed to maintain

compliance with SWRCB - Closure and Post-Closure Maintenance Requirements for Solid Waste under California Code Regs. Title 27 § 21090.

Washrack Site

Field notes from past monitoring events have documented obstructions in monitoring wells WR-MW-01 and WR-MW-02. The obstructions are assumed to be due to bent well casings, because root intrusion is unlikely (minimal surface vegetation) and the obstructions occur at depths greater than 50 ft bgs. Despite the obstructions, water levels are successfully measured, and sampling is performed using 1.3-inch diameter passive diffusion bags. As described in subsequent sections, monitoring well video logging will be performed to document down-hole well conditions for potential future rehab, if necessary.

During the 2023 First Semiannual Groundwater Monitoring event performed on June 15, 2023 (report *in prep*), labels were added to all wells and soil was removed from well boxes at WR-MW-09A and WR-MW-10A. Minor maintenance repairs remain, such as replacement of bolts and well gaskets. The most efficient and lasting repair solution is to install new well box kits, as described in this work plan.

Pre-Field Work Clearance and Planning

Areas identified for intrusive activities will be cleared of underground utilities and marked by a qualified utility locating firm. The required environmental clearances for intrusive work will be obtained from the BOP. Clearance activities include notification of utility agencies and utility protection organizations, as appropriate. Locations of buried utilities will be marked on the ground surface with color indicators for the assumed type of utility. Before initiating intrusive activities, utility location information will be reviewed, including field markings and available drawings.

Support Facilities

Support facilities include lockable containers, chemical toilets, portable containment tanks, and bins with lids. Lockable support facilities will be secured when project personnel are not onsite in an area agreed upon by the BOP.

Daily Quality Control Reports

The USACE will receive Daily Quality Control Reports (DQCR) which include:

- Summary of work activities, onsite personnel and equipment, and representative photos
- Inspection Reports
- Daily Site Safety Tailgate/Inspection logs
- Equipment Inspection Form (if applicable)
- Daily logs and documentation to support work completion and payment milestones

Site Safety and Health

Project activities will be performed in compliance with the existing project Accident Prevent Plan (Ahtna, 2021). Tasks will be conducted to protect the safety and health of employees and members of the public and that complies with Occupational Safety and Health Administration and USACE Health and Safety Requirements.

Wood Dump Erosion Repairs

As part of the ongoing maintenance of the Wood Dump area of the Former USDB, minor erosion repairs at the northern slope will be performed to ensure continued slope stability (Figure 2). Before intrusive activities, a geophysical survey using ground penetrating radar and electromagnetic (EM) devices will ensure buried utilities are not disturbed/impacted. The geophysical survey results will be incorporated into the daily field reports, including color-filled contour maps showing EM anomalies (if present).

Earthwork equipment such as a backhoe will excavate up to 15 tons of suitable soil from the approved onsite borrow area. Workers will ensure adequate dust control by adding moisture during earthwork activities. The excavated soils will be transferred to the repair areas, and the borrow area will be smoothed out by the excavation equipment to ensure the area is stable before departure. Borrowed soils placed in existing erosion rills will be track compacted, and moisture from a nearby onsite hydrant will be added to achieve approximately 85-90% relative density. The field team will visually confirm compaction, and results will be documented in daily field reports.

After erosion rills are filled in and compacted, 100 ft of biodegradable straw wattles will be installed across the repaired areas to reduce stormwater flow velocity. Wattles will be installed following the *California Department of Transportation Construction Site Best Management Practices Manual* (Caltrans, 2017).

Former Army Landfill

In response to the inspection documentation provided by the County of Santa Barbara (Lead Enforcement Agency) in the 2022 Annual Inspection Report (Ahtna, 2022a), Attachment 1, vegetative cover repairs and rodent control measures will be performed as described below:

Landfill Cap Repairs

Approximately 540 tons of suitable topsoil/compost mix will be imported and installed in a 2-inch layer over the entire FAL fenced boundary, followed by an application of hydroseed. The topsoil/compost/hydroseed will cover about 67,500 square feet. No subgrade preparation is anticipated, and the topsoil/compost layer will be lightly scarified in preparation for hydroseed placement. Hydroseed material will be composed of a native mix suitable for the County of Santa Barbara area and suitable wood mulch fibers. The hydroseed mix will be applied during the wet season (December through March), and no irrigation is anticipated to be required to facilitate seed germination.

The planned seed mix design is as follows:

Species	Application Rate (lbs/acre)
Lupinus bicolor	10
Trifolium willdenovii	5
Distichlis spicata	1
Elymus glaucus ssp glaucus	5
Elymus multisetus	1
Hordeum brachyantherum californicum	3

Owl Box Installation

For added rodent control at the FAL, two owl boxes attached to a 15-foot tall, 2-inch diameter galvanized steel pole will be installed on the northern and southern ends of the fenced area. The owl box pole posts will be installed on a concrete footing. Raptor perches will be included with the owl boxes as a rodent control measure.

Washrack

Groundwater Monitoring Well Video Logging and Repairs

Based on the age of the existing groundwater monitoring well network, well maintenance will be performed at 11 locations (Figure 3). Before maintenance activities commence, a downhole camera will be placed in each well location, and video will be recorded to document the well condition and identify obstructions. The downhole condition of each well location will be documented in daily field reports for potential future rehabilitation efforts if deemed necessary.

Upon completion of video logging, 11 groundwater monitoring well locations will undergo surface completion rehabilitation, including complete new well box kit installation, which includes well boxes, lids, gaskets, and bolt replacement. Construction debris (e.g., well casings, concrete, bollards, etc.) and general trash will be disposed of offsite as non-hazardous solid waste.

Reporting

The actions performed under this Technical Memorandum, conclusions, and recommendations will be reported in a Technical Memorandum Completion Report. The Completion Report will include summary tables of well conditions, field reports, and quality control documentation.

Please get in touch with the undersigned should you have any questions.

Sincerely,

Ahtna Global, LLC



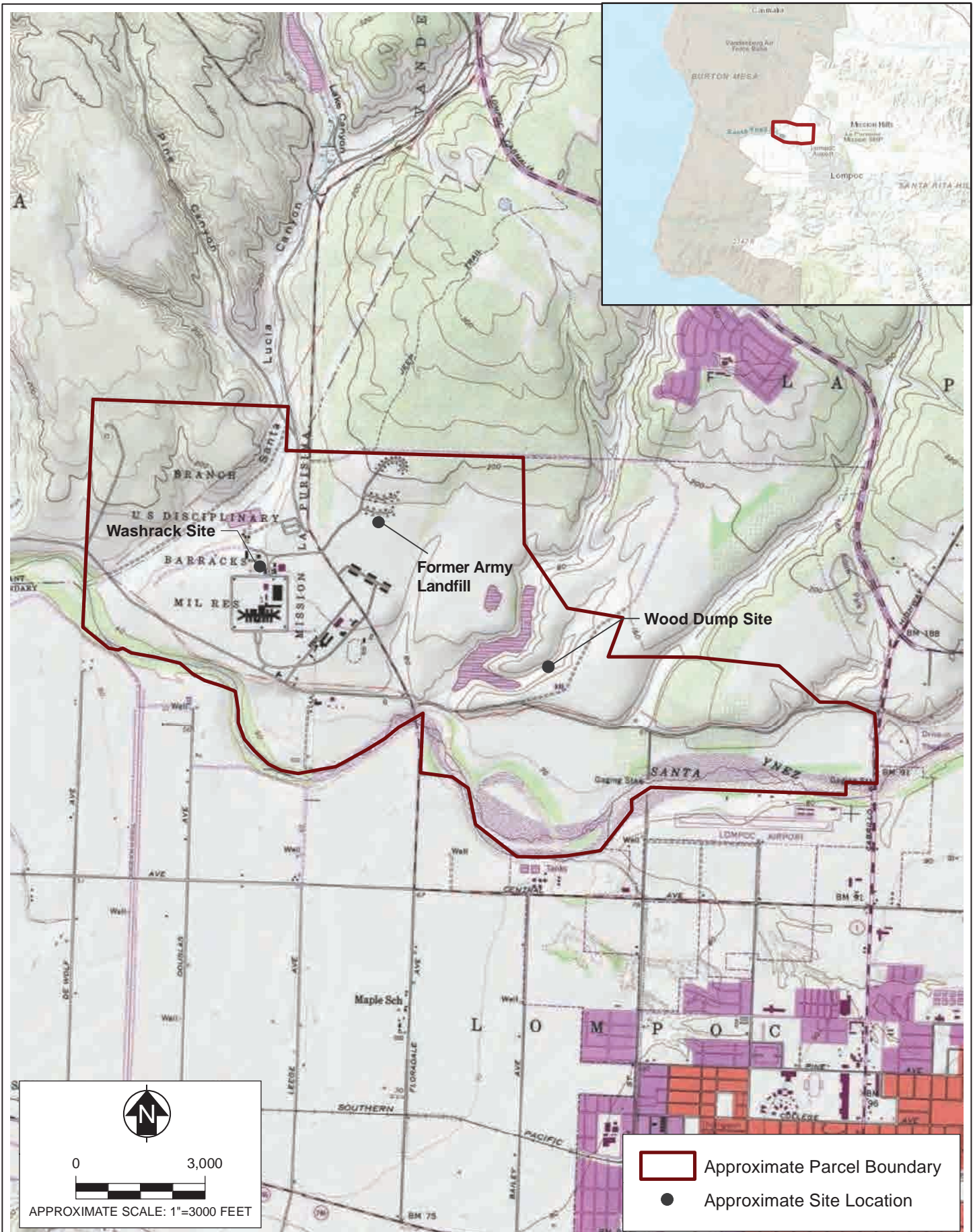
Sommer Carter
Program Manager
(925) 357-0750

References

- Ahtna Global, LLC (Ahtna), 2023a. *2022 Annual Inspection Report, Wood Dump and Former Army Landfill*, Environmental Long-Term Monitoring and Inspection Former U.S. Disciplinary Barracks (USDB), Lompoc, California. April.
- Ahtna, 2022b. *2022 Second Semiannual Groundwater Monitoring Report, Washrack Site*, Environmental Long-Term Monitoring and Inspection Former U.S. Disciplinary Barracks (USDB), Lompoc, California. July
- Ahtna, 2021. *Accident Prevent Plan*, Environmental Long-Term Monitoring and Inspection Former U.S. Disciplinary Barracks (USDB), Lompoc, California.

California Department of Transportation (Caltrans), 2017. *Construction Site Best Management Practices (BMP) Manual*. May.

Figures

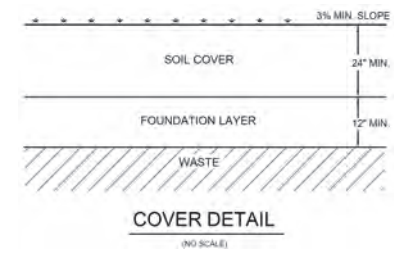


Site Maintenance Work Plan
 Environmental Long-Term Monitoring
 Former USDB
 Lompoc, California

Site Location Map

1

Source: ERG, 2021. Washrack Site Second Semiannual 2020 Groundwater Monitoring Report, Former United States Disciplinary Barracks, Lompoc, California





Approximate Location of Erosion

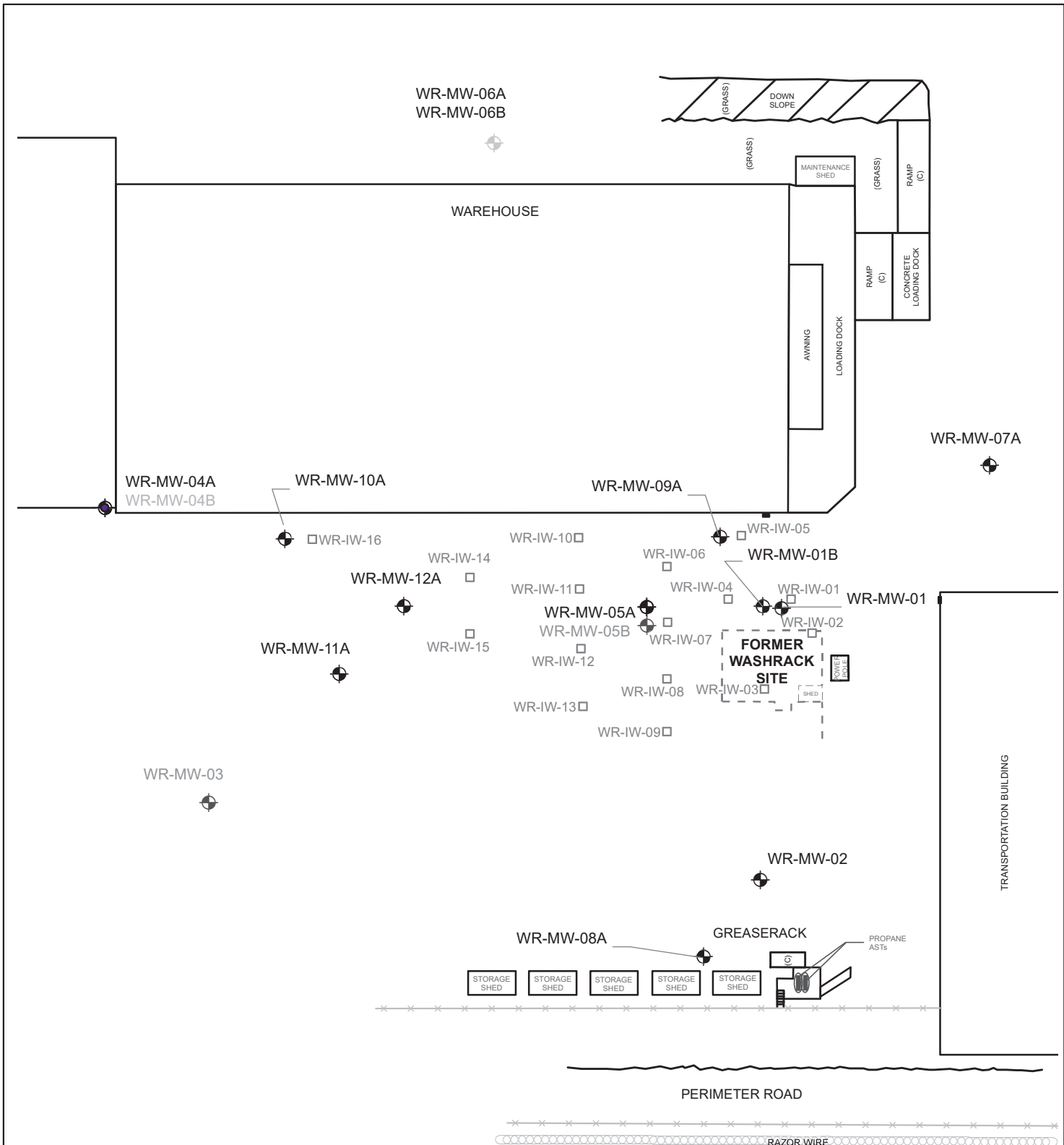
Approximate Location of Backfill Source Area

Notes:
1. High-density polyethylene (HDPE) drain pipes were installed October 2005 as part of the permanent erosion repairs.

- LEGEND:**
- △ Gas Monitoring Vapor Point
 - ⊕ Groundwater Monitoring Well
 - ===== 24" Corrugated Metal Pipe Culvert
 - 12" HDPE Drain Pipe
 - Drain Inlet
 - Permanent Erosion Control Mat Lined Ditch
 - ✂ Fence
 - ○ Gate
 - Concrete V-Ditch
 - Rip Rap
 - Limit of Waste
 - 1-foot Contour Interval

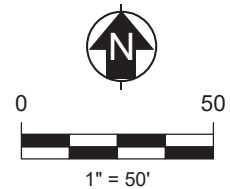



Elevation data from USGS
Coordinate System: U.S. State Plane, California FIPS 0405 Zone V, NAD 1983 Datum
Projection: Lambert Conformal Conic



LEGEND:

- Former Injection Well (Abandoned)
- ⊕ Monitoring Well
- ⊕ Former Monitoring Well
- *—*—* Fence



Source: ERRG, 2021. Washrack Site Second Semiannual 2020 Groundwater Monitoring Report, Former United States Disciplinary Barracks, Lompoc, California. January.

Attachments

Attachment 1:
Appendices from the Final USDB Lompoc 2022 Annual Inspection Report

Appendix A. Santa Barbara County Environmental Health Services Site Inspection Reports

Closed Disposal Site Inspection Report (188)
Lompoc Federal Prison Wwds/LF (42-CR-0019)
4/29/2022

Inspection Information

Inspected By: Santa Barbara County	Local Inspection ID:
Inspection Date: 4/29/2022	Time In: 10:30 AM
Inspection Type: Periodic	Time Out: 12:30 PM
Inspector: Yosuke Yamada	Inspection Duration: 2 hours
Operator: US Penitentiary, Lompoc	
Received By: Pena Fernando	
Also Present (Name): Pena Fernando, Tim Elmore	

Facility/Activity Information

Enforcement Agency: County of Santa Barbara	SWIS Number: 42-CR-0019
Facility: Lompoc Federal Prison Wwds/LF N Santa Ynez Rvr E Of Snta Lucia Cyn Rd Lompoc, CA 93437	
Activity: Solid Waste Disposal Site	
Operational Status: Closed	Regulatory Status: Unpermitted
Land Owners(s): US Penitentiary, Lompoc	

The above facility was inspected for compliance with applicable sections of Division 30 of the Public Resources Code (PRC) and Title 14 and Title 27, California Code of Regulations (CCR).

No Violations

No Areas of Concern

Inspection Report Comments

Weather: Clear, Calm 64 degrees F.

Routine Semi-Annual Inspection.

Old Army Barracks Site

Notes:

Closed Disposal Site Inspection Report (188)
Lompoc Federal Prison Wwds/LF (42-CR-0019)
4/29/2022

- 1) Site is secure with fencing well maintained. Vegetative cover well established.
- 2) Observed noticeable exposed debris (glass shards) dug up by rodent animals over the entire surface of the dumpsite.
- 3) Rodent traps maintained operative.

Wood Dump Site Notes:

- 1) Site is secure with fencing well maintained.
- 2) Vegetative cover well established.
- 3) Using a RKI GX-6000, the LEA measured methane gas from perimeter probes #1, #2, #3, and #4.

#1 - 0.0%

#2 - 0.0%

#3 - 0.0%

#4 - 0.0%

No Attachments

Closed Disposal Site Inspection Report (188)
Lompoc Federal Prison Wwds/LF (42-CR-0019)
8/26/2022

Inspection Information

Inspected By: Santa Barbara County	Local Inspection ID:
Inspection Date: 8/26/2022	Time In: 10:30 AM
Inspection Type: Periodic	Time Out: 12:30 PM
Inspector: Yosuke Yamada	Inspection Duration: 2 hours
Operator: US Penitentiary, Lompoc	
Received By:	
Also Present (Name): Pena Fernando	

Facility/Activity Information

Enforcement Agency: County of Santa Barbara	SWIS Number: 42-CR-0019
Facility: Lompoc Federal Prison Wwds/LF N Santa Ynez Rvr E Of Snta Lucia Cyn Rd Lompoc, CA 93437	
Activity: Solid Waste Disposal Site	
Operational Status: Closed	Regulatory Status: Unpermitted
Land Owners(s): US Penitentiary, Lompoc	

The above facility was inspected for compliance with applicable sections of Division 30 of the Public Resources Code (PRC) and Title 14 and Title 27, California Code of Regulations (CCR).

No Violations

No Areas of Concern

Inspection Report Comments

Weather: Clear, Calm 54 degrees F.

Routine Semi-Annual Inspection.

Old Army Barracks Site

Notes:

Closed Disposal Site Inspection Report (188)
Lompoc Federal Prison Wwds/LF (42-CR-0019)
8/26/2022

- 1) Site is secure with fencing well maintained.
- 2) Observed noticeable exposed debris (glass shards) dug up by rodent animals over the entire surface of the dumpsite.
- 3) Rodent traps maintained operative.
- 4) Vegetative maintenance shall be performed.

§21090. SWRCB - Closure and Post-Closure Maintenance Requirements for Solid Waste Landfills.

(a) Final Cover Requirements

(D) Vegetation Maintenance — for a final cover utilizing a vegetated erosion-resistant layer [under (a)(3)(A)1.], a plan for maintaining this vegetative cover, including fertilization, irrigation, elimination of species that violate the rooting depth limit [of (a)(3)(A)1.d.], replanting, and irrigation system maintenance.

(3) Erosion-Resistant Layer — The low-hydraulic-conductivity layer of (a)(2) shall be directly overlain by an erosion-resistant layer, as follows.

- a. contains no waste (including leachate);
- b. is placed on top of all portions of the low-hydraulic-conductivity layer described in (a)(2);
- c. is capable of sustaining native, or other suitable, plant growth;
- d. is initially planted — and is later replanted as needed to provide effective erosion resistance — with native or other suitable vegetation having a rooting depth not exceeding the depth to the top of the low-hydraulic-conductivity layer described in (a)(2). For any proposed vegetative cover, the discharger shall propose a species mix which harmonizes with the proposed post-closure land use, and which requires as little long-term maintenance as feasible by virtue of its tolerance of the vegetative layer's soil conditions (e.g., the presence of landfill gas), its resistant to foreseeable adverse environmental factors (e.g., climate, disease, and pests), its rapidity of germination and growth, its persistence and ease of self-propagation, its high percentage of surface coverage (sufficient to prevent surface erosion), and its minimal need for irrigation and maintenance;

Wood Dump Site

Notes:

Closed Disposal Site Inspection Report (188)
Lompoc Federal Prison Wwds/LF (42-CR-0019)
8/26/2022

- 1) Site is secure with fencing well maintained.
- 2) Vegetative cover well established.
- 3) Using a RKI GX-6000, the LEA measured methane gas from perimeter probes #1, #2, #3, and #4.

#1 - 0.0%

#2 - 2% of the Lower Explosive Limit (LEL). LEL equal to 5% by volume.

#3 - 0.0%

#4 - 0.0%

No Attachments

Appendix B. Bureau of Prisons Site Inspection Reports

FBOP WOPM
Planned Event
LOX

70218
2/6/2022
ET2 CMS OFC 2/PENA

WO Description: FCC QTR (FAL) LANDFILL INSP

Site:
Building:
Location:

If Applicable, ensure all safety precautions are followed to include but not limited to "Lockout/Tagout, Confined Space Entry, & Fall Protection"

Ensure all equipment has a MWI label affixed that is in clear view and legible. Ensure all MWI information is correct.

Schedule: 36094

This Inspection is to be filed with the Facilities Management Office upon completion.

AND WITH THE

ARMY FOR INCLUSION FOR THEIR ROUTINE REPORTING

Cmp Freq Proc # NAP
 Q 30529

1. FOLLOW UP WITH STAFF TO ENSURE SAID INSPECTION/TASK WILL BE CONDUCTED IN A TIMELY MANNER.
2. TASK FOR SAID INSPECTION MAY BE INCLUDED BUT THIS IS ONLY FOR REFERENCE PURPOSES.
3. COMPILE REPORT.
4. FILE AS NECESSARY. REQUIRED DOCUMENTS MAY INCLUDE BUT NOT LIMITED TO: ENTRANCE MEMOS, RESIDENCY FORM, PROCUREMENT DOCUMENTS, INSPECTION REPORT, A COPY OF THE COMPLETED PM/PE THAT JUSTIFIED SAID INSPECTION/TEST, POA'S WITH THE MWR, IF APPLICABLE.
5. PREPARE DOCUMENTS FOR WORK PROGRAMMING.
6. SEND TO REGION, IF APPLICABLE (ELEVATOR, GAS, BOILERS, B&G, OPERATIONAL REVIEW).

Cmp Freq Proc # NAP
 Q 30701

FORMER ARMY LANDFILL, BRAC

THERE ARE FOUR AREAS TO BE INSPECTED:

- 1.) FARM FUEL SITE: LOCATED APPROXIMATELY 500 FEET SOUTH OF THE FCI, BETWEEN THE FPC AND THE DAIRY. (Capped Off)
- 2.) WASH RACK SITE: LOCATED IMMEDIATELY NORTH OF THE FCC MED AND TO THE WEST OF THE TRANSPORTATION BUILDING.
- 3.) FORMER ARMY LANDFILL SITE: LOCATED BETWEEN THE TWO STAFF HOUSING AREAS.
- 4.) WOOD DUMP SITE: THIS IS A 7 ACRE CANYON SITE THAT IS SITUATED GENERALLY NORTH AND SOUTH TRENDING CANYON (COWBOY AREA).

INSPECTION AS RELATED TO ABOVE:

WASH RACK SITE:

- 1.) IS THERE EVIDENCE OF DISTURBED SOIL BELOW 2"? YES _____ NO X
IS THERE EVIDENCE OF CONSTRUCTION? YES _____ NO X
- 2.) ARE VEHICLES PARKED UPON THE WELLS? YES _____ NO X
IS THERE EVIDENCE OF VEHICLES, EQUIPMENT AND OR STORAGE CONTAINERS LEAKING? YES _____ NO X

LANDFILL:

- 3.) IS FENCING INTACT? YES X NO _____
ARE THERE SIGN OF ANIMALS BURROWING UNDER AND/OR NEAR THE FENCE LINE? YES _____ NO X
SITE IS MOWED PERIODICALLY? YES X NO _____

WOOD DUMP SITE:

- 4.) IS FENCING INTACT? YES X NO _____
IS THERE SIGNS OF ANIMALS BURROWING UNDER AND/OR NEAR THE FENCE LINE? YES _____ NO X
IS VEGETATION PRESENT? YES X NO _____

**FBOP WOPM
Planned Event
LOX**

**70218
2/6/2022
ET2 CMS OFC 2/PENA**

ARE CULVERTS CLEAN OF DEBRIS FOR FREE FLOW OF RUNOFF? YES NO

SELF GENERATE A WORK ORDER TO RESOLVE ANY DEFICIENCIES NOTED

**THE ENTIRE INFORMATIONAL PACKET CAN BE FOUND IN P:/ DRIVE, FACILITIES, UNDER TESTING-BRAC.

PROVIDE A COPY (ELECTRONIC VERSION) OF THIS REPORT TO THE ARMY FOR INCLUSION IN ROUTINE REPORTING. SEND TO:

Army BRACD

*Ms. Jennifer Adawale (COR), Jen.M.Adawale.civ@mail.mil, 703.602.6410 (contracting only)

*Mr Webster W. (Hank) Proctor (PM), webster.w.proctor.civ@mail.mil, 703-344-8703

*Mr. Scott Armstrong (Army BEC), scott.armstrong@calibresys.com, 916-261-4577

*Ms. Heath Elliott (Army BEC), Heather.Elliott@calibresys.com, 256-217-1678

US Bureau of Prisons HQ

*Mr. Thomas (Tom) Webber, twebber@bop.gov, 202.514.6470 (Chief, Capacity Planning, Site Selection)

Central Coast Regional Water Quality Control Board

* Mr. Bryan Little, Bryan.Little@waterboards.ca.gov, 805.549.3704 (Engineering Geologist, CCRWQCB PM for the Lompoc Washrack site) (1,2)

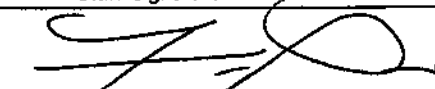
*Ms. Sheila Soderberg, ssoderberg@waterboards.ca.gov, 805.549.3592 (DoD Sites lead) (Ms. Soderberg is the CCRWQCB Supervisor)

County Of Santa Barbara

Mrs Norma Campos Bernal Norma.CamposBernal@sbcphd.org

Mr. Yosuke.Yamada@sbcphd.org, 805.346.8466

LIST BELOW COMMENTS AND ALL MATERIAL USED.

	Act. Staff Hours: _____ 1.00
	Material Cost: _____ 6
	Date Completed: _____ 2/8/2022
	Staff Signature
	

FBOP WOPM
Planned Event
LOX

72381
5/8/2022
ET2 CMS OFC 2/PENA

WO Description: FCC QTR (FAL) LANDFILL INSP

Site:
Building:
Location:

If Applicable, ensure all safety precautions are followed to include but not limited to "Lockout/Tagout, Confined Space Entry, & Fall Protection"

Ensure all equipment has a MWI label affixed that is in clear view and legible. Ensure all MWI information is correct.

Schedule: 36094

This Inspection is to be filed with the Facilities Management Office upon completion.

AND WITH THE

ARMY FOR INCLUSION FOR THEIR ROUTINE REPORTING

Cmp Freq Proc # NAP
 Q 30529

1. FOLLOW UP WITH STAFF TO ENSURE SAID INSPECTION/TASK WILL BE CONDUCTED IN A TIMELY MANNER.
2. TASK FOR SAID INSPECTION MAY BE INCLUDED BUT THIS IS ONLY FOR REFERENCE PURPOSES.
3. COMPILE REPORT.
4. FILE AS NECESSARY. REQUIRED DOCUMENTS MAY INCLUDE BUT NOT LIMITED TO: ENTRANCE MEMOS, RESIDENCY FORM, PROCUREMENT DOCUMENTS, INSPECTION REPORT, A COPY OF THE COMPLETED PWPE THAT JUSTIFIED SAID INSPECTION/TEST, POA'S WITH THE MWR, IF APPLICABLE.
5. PREPARE DOCUMENTS FOR WORK PROGRAMMING.
6. SEND TO REGION, IF APPLICABLE (ELEVATOR, GAS, BOILERS, B&G, OPERATIONAL REVIEW).

Cmp Freq Proc # NAP
 Q 30701

FORMER ARMY LANDFILL, BRAC

THERE ARE FOUR AREAS TO BE INSPECTED:

- 1.) FARM FUEL SITE: LOCATED APPROXIMATELY 500 FEET SOUTH OF THE FCI, BETWEEN THE FPC AND THE DAIRY. (Capped Off)
- 2.) WASH RACK SITE: LOCATED IMMEDIATELY NORTH OF THE FCC MED AND TO THE WEST OF THE TRANSPORTATION BUILDING.
- 3.) FORMER ARMY LANDFILL SITE: LOCATED BETWEEN THE TWO STAFF HOUSING AREAS.
- 4.) WOOD DUMP SITE: THIS IS A 7 ACRE CANYON SITE THAT IS SITUATED GENERALLY NORTH AND SOUTH TRENDING CANYON (COWBOY AREA).

INSPECTION AS RELATED TO ABOVE:

WASH RACK SITE:

- 1.) IS THERE EVIDENCE OF DISTURBED SOIL BELOW? YES _____ NO X
IS THERE EVIDENCE OF CONSTRUCTION? YES _____ NO X
- 2.) ARE VEHICLES PARKED UPON THE WELLS? YES _____ NO X
IS THERE EVIDENCE OF VEHICLES, EQUIPMENT AND OR STORAGE CONTAINERS LEAKING? YES _____ NO X

LANDFILL:

- 3.) IS FENCING INTACT? YES X NO _____
ARE THERE SIGN OF ANIMALS BURROWING UNDER AND/OR NEAR THE FENCE LINE? YES _____ NO X
SITE IS MOWED PERIODICALLY? YES X NO _____

WOOD DUMP SITE:

- 4.) IS FENCING INTACT? YES X NO _____
IS THERE SIGNS OF ANIMALS BURROWING UNDER AND/OR NEAR THE FENCE LINE? YES _____ NO X
IS VEGETATION PRESENT? YES X NO _____

**FBOP WOPM
Planned Event
LOX**

**72381
5/8/2022
ET2 CMS OFC 2/PENA**

ARE CULVERTS CLEAN OF DEBRIS FOR FREE FLOW OF RUNOFF? YES NO

SELF GENERATE A WORK ORDER TO RESOLVE ANY DEFICIENCIES NOTED

**THE ENTIRE INFORMATIONAL PACKET CAN BE FOUND IN P:/ DRIVE, FACILITIES, UNDER TESTING-BRAC.

PROVIDE A COPY (ELECTRONIC VERSION) OF THIS REPORT TO THE ARMY FOR INCLUSION IN ROUTINE REPORTING. SEND TO:

Amy BRACD

*Ms. Jennifer Adawale (COR), Jen.M.Adewale.civ@mail.mil, 703.602.6410 (contracting only)

*Mr Webster W. (Hank) Proctor (PM), webster.w.proctor.civ@mail.mil, 703-344-8703

*Mr. Scott Armstrong (Army BEC), scottarmstrong@calibresys.com, 916-261-4577

*Ms. Heath Elliott (Army BEC), Heather.Elliott@calibresys.com, 256-217-1678

US Bureau of Prisons HQ

*Mr. Thomas (Tom) Webber, twebber@bop.gov, 202.514.6470 (Chief, Capacity Planning, Site Selection)

Central Coast Regional Water Quality Control Board

* Mr. Bryan Little, Bryan.Little@waterboards.ca.gov, 805.549.3704 (Engineering Geologist, CCRWQCB PM for the Lompoc Washrack site) (1,2)

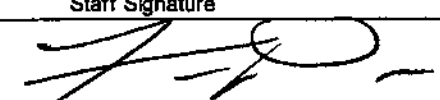
*Ms. Sheila Soderberg, ssoderberg@waterboards.ca.gov, 805.549.3592 (DoD Sites lead) (Ms. Soderberg is the CCRWQCB Supervisor)

County Of Santa Barbara

Mrs Norma Campos Bernal Norma.CamposBernal@sbcphd.org

Mr. Yosuke.Yamada@sbcphd.org, 805.346.8466

LIST BELOW COMMENTS AND ALL MATERIAL USED.

	Act. Staff Hours: _____ 1.00
	Material Cost: _____ \emptyset
	Date Completed: _____ 5/10/2022
	Staff Signature
	

FBOP WOPM
Planned Event
LOX

74709
8/7/2022
ET2 CMS OFC 2/PENA

WO Description: FCC QTR (FAL) LANDFILL INSP

Site:

Building:

Location:

If Applicable, ensure all safety precautions are followed to include but not limited to "Lockout/Tagout, Confined Space Entry, & Fall Protection"

Ensure all equipment has a MWI label affixed that is in clear view and legible. Ensure all MWI information is correct.

Schedule: 36094

This Inspection is to be filed with the Facilities Management Office upon completion.

AND WITH THE

ARMY FOR INCLUSION FOR THEIR ROUTINE REPORTING

Cmp Freq Proc # NAP
 Q 30529

1. FOLLOW UP WITH STAFF TO ENSURE SAID INSPECTION/TASK WILL BE CONDUCTED IN A TIMELY MANNER.
2. TASK FOR SAID INSPECTION MAY BE INCLUDED BUT THIS IS ONLY FOR REFERENCE PURPOSES.
3. COMPILE REPORT.
4. FILE AS NECESSARY. REQUIRED DOCUMENTS MAY INCLUDE BUT NOT LIMITED TO: ENTRANCE MEMOS, RESIDENCY FORM, PROCUREMENT DOCUMENTS, INSPECTION REPORT, A COPY OF THE COMPLETED PM/PE THAT JUSTIFIED SAID INSPECTION/TEST, POA'S WITH THE MWR, IF APPLICABLE.
5. PREPARE DOCUMENTS FOR WORK PROGRAMMING.
6. SEND TO REGION, IF APPLICABLE (ELEVATOR, GAS, BOILERS, B&G, OPERATIONAL REVIEW).

Cmp Freq Proc # NAP
 Q 30701

FORMER ARMY LANDFILL, BRAC

THERE ARE FOUR AREAS TO BE INSPECTED:

- 1.) FARM FUEL SITE: LOCATED APPROXIMATELY 500 FEET SOUTH OF THE FCI, BETWEEN THE FPC AND THE DAIRY. (Capped Off)
- 2.) WASH RACK SITE: LOCATED IMMEDIATELY NORTH OF THE FCC MED AND TO THE WEST OF THE TRANSPORTATION BUILDING.
- 3.) FORMER ARMY LANDFILL SITE: LOCATED BETWEEN THE TWO STAFF HOUSING AREAS.
- 4.) WOOD DUMP SITE: THIS IS A 7 ACRE CANYON SITE THAT IS SITUATED GENERALLY NORTH AND SOUTH TRENDING CANYON (COWBOY AREA).

INSPECTION AS RELATED TO ABOVE:

WASH RACK SITE:

- 1.) IS THERE EVIDENCE OF DISTURBED SOIL BELOW? YES _____ NO X
IS THERE EVIDENCE OF CONSTRUCTION? YES _____ NO X
- 2.) ARE VEHICLES PARKED UPON THE WELLS? YES _____ NO X
IS THERE EVIDENCE OF VEHICLES, EQUIPMENT AND OR STORAGE CONTAINERS LEAKING? YES _____ NO X

LANDFILL:

- 3.) IS FENCING INTACT? YES X NO _____
ARE THERE SIGN OF ANIMALS BURROWING UNDER AND/OR NEAR THE FENCE LINE? YES _____ NO X
SITE IS MOWED PERIODICALLY? YES X NO _____

WOOD DUMP SITE:

- 4.) IS FENCING INTACT? YES X NO _____
IS THERE SIGNS OF ANIMALS BURROWING UNDER AND/OR NEAR THE FENCE LINE? YES _____ NO X
IS VEGETATION PRESENT? YES X NO _____

**FBOP WOPM
Planned Event
LOX**

**74709
8/7/2022
ET2 CMS OFC 2/PENA**

ARE CULVERTS CLEAN OF DEBRIS FOR FREE FLOW OF RUNOFF? YES NO

SELF GENERATE A WORK ORDER TO RESOLVE ANY DEFICIENCIES NOTED

**THE ENTIRE INFORMATIONAL PACKET CAN BE FOUND IN P:/ DRIVE, FACILITIES, UNDER TESTING-BRAC.

PROVIDE A COPY (ELECTRONIC VERSION) OF THIS REPORT TO THE ARMY FOR INCLUSION IN ROUTINE REPORTING. SEND TO:

Army BRACD

*Ms. Jennifer Adawale (COR), Jen.M.Adawale.civ@mail.mil, 703.602.6410 (contracting only)

*Mr Webster W. (Hank) Proctor (PM), webster.w.proctor.civ@mail.mil, 703-344-8703

*Mr. Scott Armstrong (Army BEC), scottarmstrong@calibresys.com, 916-261-4577

*Ms. Heathhe Elliott (Army BEC), Heather.Elliott@calibresys.com, 256-217-1678

US Bureau of Prisons HQ

*Mr. Thomas (Tom) Webber, twebber@bop.gov, 202.514.6470 (Chief, CapacityPlanning, Site Selection)

Central Coast Regional Water Quality Control Board

* Mr. Bryan Little, Bryan.Little@waterboards.ca.gov, 805.549.3704 (Engineering Geologist, CCRWQCB PM for the Lompoc Washrack site) (1,2)


*Ms. Sheila Soderberg, ssoderberg@waterboards.ca.gov, 805.549.3592 (DoD Sites lead) (Ms. Soderberg is the CCRWQCB Supervisor)

County Of Santa Barbara

Mrs Norma Campos Bernal Norma.CamposBernal@sbcphd.org

Mr. Yosuke.Yamada@sbcphd.org, 805.346.8466

LIST BELOW COMMENTS AND ALL MATERIAL USED.

	Act. Staff Hours: _____ 2.00
	Material Cost: _____ <i>0</i>
	Date Completed: _____ 8/26/2022
	Staff Signature
	

FBOP WOPM
Planned Event
LOX

77351
11/6/2022
ET2 CMS OFC 2/PENA

WO Description: FCC QTR (FAL) LANDFILL INSP

Site:

Building:

Location:

If Applicable, ensure all safety precautions are followed to include but not limited to "Lockout/Tagout, Confined Space Entry, & Fall Protection"

Ensure all equipment has a MWI label affixed that is in clear view and legible. Ensure all MWI information is correct.

Schedule: 36094

This Inspection is to be filed with the Facilities Management Office upon completion.

AND WITH THE

ARMY FOR INCLUSION FOR THEIR ROUTINE REPORTING

Cmp Freq Proc # NAP
 S 30529

1. FOLLOW UP WITH STAFF TO ENSURE SAID INSPECTION/TASK WILL BE CONDUCTED IN A TIMELY MANNER.
2. TASK FOR SAID INSPECTION MAY BE INCLUDED BUT THIS IS ONLY FOR REFERENCE PURPOSES.
3. COMPILE REPORT.
4. FILE AS NECESSARY. REQUIRED DOCUMENTS MAY INCLUDE BUT NOT LIMITED TO: ENTRANCE MEMOS, RESIDENCY FORM, PROCUREMENT DOCUMENTS, INSPECTION REPORT, A COPY OF THE COMPLETED PM/PE THAT JUSTIFIED SAID INSPECTION/TEST, POA'S WITH THE MWR, IF APPLICABLE.
5. PREPARE DOCUMENTS FOR WORK PROGRAMMING.
6. SEND TO REGION, IF APPLICABLE (ELEVATOR, GAS, BOILERS, B&G, OPERATIONAL REVIEW).

Cmp Freq Proc # NAP
 S 30701

FORMER ARMY LANDFILL, BRAC

THERE ARE FOUR AREAS TO BE INSPECTED:

- 1.) FARM FUEL SITE: LOCATED APPROXIMATELY 500 FEET SOUTH OF THE FCI, BETWEEN THE FPC AND THE DAIRY. (Capped Off)
- 2.) WASH RACK SITE: LOCATED IMMEDIATELY NORTH OF THE FCC MED AND TO THE WEST OF THE TRANSPORTATION BUILDING.
- 3.) FORMER ARMY LANDFILL SITE: LOCATED BETWEEN THE TWO STAFF HOUSING AREAS.
- 4.) WOOD DUMP SITE: THIS IS A 7 ACRE CANYON SITE THAT IS SITUATED GENERALLY NORTH AND SOUTH TRENDING CANYON (COWBOY AREA).

INSPECTION AS RELATED TO ABOVE:

WASH RACK SITE:

- 1.) IS THERE EVIDENCE OF DISTURBED SOIL BELOW 2"? YES _____ NO X
IS THERE EVIDENCE OF CONSTRUCTION? YES _____ NO X
- 2.) ARE VEHICLES PARKED UPON THE WELLS? YES _____ NO X
IS THERE EVIDENCE OF VEHICLES, EQUIPMENT AND OR STORAGE CONTAINERS LEAKING? YES _____ NO X

LANDFILL:

- 3.) IS FENCING INTACT? YES X NO _____
ARE THERE SIGN OF ANIMALS BURROWING UNDER AND/OR NEAR THE FENCE LINE? YES _____ NO X
SITE IS MOWED PERIODICALLY? YES X NO _____

WOOD DUMP SITE:

- 4.) IS FENCING INTACT? YES X NO _____
IS THERE SIGNS OF ANIMALS BURROWING UNDER AND/OR NEAR THE FENCE LINE? YES _____ NO X
IS VEGETATION PRESENT? YES X NO _____

FBOP WOPM
Planned Event
LOX

77351
11/6/2022
ET2 CMS OFC 2/PENA

ARE CULVERTS CLEAN OF DEBRIS FOR FREE FLOW OF RUNOFF? YES NO

SELF GENERATE A WORK ORDER TO RESOLVE ANY DEFICIENCIES NOTED

**THE ENTIRE INFORMATIONAL PACKET CAN BE FOUND IN P:/ DRIVE, FACILITIES, UNDER TESTING-BRAC.

PROVIDE A COPY (ELECTRONIC VERSION) OF THIS REPORT TO THE ARMY FOR INCLUSION IN ROUTINE REPORTING. SEND TO:

Army BRACD

*Ms. Jennifer Adawale (COR), Jen.M.Adewale.civ@mail.mil, 703.602.6410 (contracting only)

*Mr Webster W. (Hank) Proctor (PM), webster.w.proctor.civ@mail.mil, 703-344-8703

*Mr. Scott Armstrong (Army BEC), scottarmstrong@calibresys.com, 916-261-4577

*Ms. Heathe Elliott (Army BEC), Heather.Elliott@calibresys.com, 256-217-1678

US Bureau of Prisons HQ

*Mr. Thomas (Tom) Webber, txwebber@bop.gov, 202.514.6470 (Chief, Capacity Planning, Site Selection)

Central Coast Regional Water Quality Control Board

* Mr. Bryan Little, Bryan.Little@waterboards.ca.gov, 805.549.3704 (Engineering Geologist, CCRWQCB PM for the Lompoc Washrack site) (1,2)


*Ms. Sheila Soderberg, ssoderberg@waterboards.ca.gov, 805.549.3592 (DoD Sites lead) (Ms. Soderberg is the CCRWQCB Supervisor)

County Of Santa Barbara

Mrs Norma Campos Bernal Norma.CamposBernal@sbcphd.org

Mr. Yosuke.Yamada@sbcphd.org, 805.346.8466

LIST BELOW COMMENTS AND ALL MATERIAL USED.

	Act. Staff Hours: <u>2.50</u>
	Material Cost: <u>Ø</u>
	Date Completed: <u>11/11/2022</u>
	Staff Signature
	

Appendix C. Wood Dump Site Inspection Checklist

Wood Dump Inspection Checklist

Site: USDB Lompoc

Date: 11/29/22

Weather: Sunny, 59-61°F

Project No.: 21044.006.01

Inspected By: C. Dunn/J. Feduck

Inspection Point	Inspected		Comments/Notes
Cover (Deck)	<u>Yes</u>	No	Well vegetated with grasses. Vast majority of woody vegetation was cleared since the December 2021 inspection. Several small animal burrows but they appear to be shallow and would not effect the integrity of the cover.
Overside Drain Inlet (North)	<u>Yes</u>	No	Concrete and drain pipe appear to be in good condition and pipe appears to be mostly clear of debris. Woody vegetation partially obstructs the drain inlet.
Overside Drain Inlet (South)	<u>Yes</u>	No	Concrete and drain pipe appear to be in good condition. Minimal soil and vegetation debris near the inlet.
24" Corrugate Metal Pipe Culvert (North)	<u>Yes</u>	No	No obstructions in the culvert. Piping, concrete, and grate all appear to be in good condition.
24" Corrugate Metal Pipe Culvert (South)	<u>Yes</u>	No	Concrete riprap extends from culvert. Pipe and surrounding structure appear to be in good condition without debris buildup. Area around pipe opening is overgrown with woody vegetation.
12" HDPE Drain Pipe (North)	<u>Yes</u>	No	Pipe is in good condition with no collapse or cracking. Minimal soil and debris near pipe opening that would not affect performance.
12" HDPE Drain Pipe (South)	<u>Yes</u>	No	Pipe is in good condition with no collapse or cracking. Woody vegetation is overgrown in the area around the pipe outlet.
Concrete V-Ditch (North)	<u>Yes</u>	No	Ditch is in good condition with no damage to concrete. Isolated areas of soil and vegetation buildup.

Wood Dump Inspection Checklist

Site: USDB Lompoc

Date: 11/29/22

Weather: Sunny, 59-61°F

Project No.: 21044.006.01

Inspected By: C. Dunn/J. Feduck

Inspection Point	Inspected		Comments/Notes
Concrete V-Ditch (South)	<u>Yes</u>	No	Concrete is in good condition. Only minimal soil and vegetation debris in the ditch.
Drain Inlet (North)	<u>Yes</u>	No	12" HDPE pipe and concrete appear to be in good condition but there is significant woody vegetation surrounding inlet.
Drain Inlet (South)	<u>Yes</u>	No	12" HDPE pipe appears to be in good condition but there is significant woody vegetation surrounding inlet. Some buildup of soil and vegetation debris.
Reinforced Concrete Inlet Structure	<u>Yes</u>	No	Reinforced concrete structure surrounding northern culvert appears to be in good condition with no cracking. Only minimal soil and debris in the bottom of the structure.
Erosion Control Lined Ditch (East)	<u>Yes</u>	No	No erosion rills and vegetated appropriately to protect cap while allowing water to flow easily. Smooth grade is maintained throughout. Erosion matting exposed in a few small locations.
Erosion Control Lined Ditch (West)	<u>Yes</u>	No	No erosion rills and vegetated appropriately to protect cap while allowing water to flow easily except for woody vegetation near southwestern end. Smooth grade is maintained throughout. Erosion matting exposed in a few small locations.
Gas Monitoring Vapor Point (WD-VP-01)	<u>Yes</u>	No	No deficiencies. Probe was locked and well painted.
Gas Monitoring Vapor Point (WD-VP-02)	<u>Yes</u>	No	No deficiencies. Probe was locked and well painted.

Wood Dump Inspection Checklist

Site: USDB Lompoc

Date: 11/29/22

Weather: Sunny, 59-61°F

Project No.: 21044.006.01

Inspected By: C. Dunn/J. Feduck

Inspection Point	Inspected		Comments/Notes
Gas Monitoring Vapor Point (WD-VP-03)	<u>Yes</u>	No	No deficiencies. Probe was locked and well painted.
Gas Monitoring Vapor Point (WD-VP-04)	<u>Yes</u>	No	No deficiencies. Probe was locked and well painted.

Appendix D. Wood Dump Inspection Photos



Photo 1: Wood Dump cover maintained/vegetated (facing southeast)



Photo 2: Wood Dump cover maintained/vegetated (facing northeast)



Photo 3: Wood Dump cover well maintained/vegetated (facing north-northeast)



Photo 4: Wood Dump cover maintained/vegetated (facing southwest)



Photo 5: Wood Dump cover maintained/vegetated (facing southeast)



Photo 6: Wood Dump cover maintained/vegetated (facing south)



Photo 7: WD-MW-05 in good condition (facing northwest)



Photo 8: WD-VP-02 in good condition (facing west)



Photo 9: Eastern Erosion Control Lined Ditch - smooth grade and minimal obstructing vegetation (facing north)

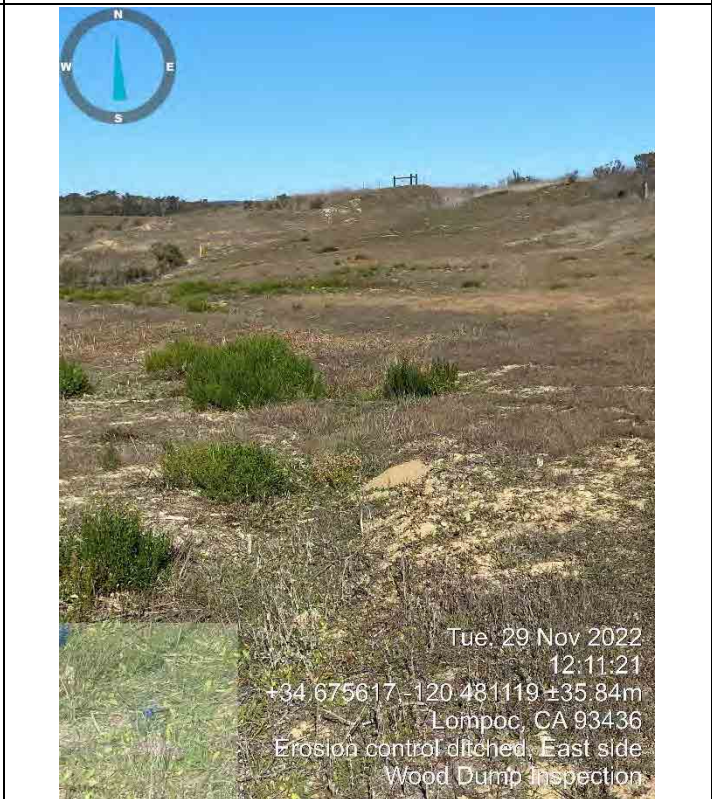


Photo 10: Eastern Erosion Control Lined Ditch - smooth grade and minimal obstructing vegetation (facing north)



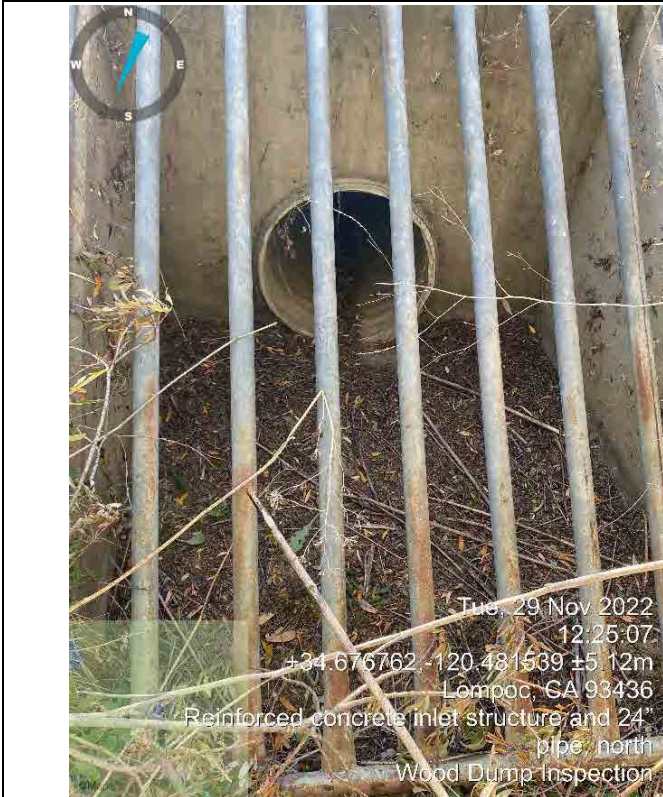
Tue, 29 Nov 2022
12:18:38
+34.676602 -120.481373 ±4.94m
Lompoc, CA 93436
Concrete v-ditch, north
Wood Dump Inspection



Tue, 29 Nov 2022
12:22:27
+34.676762 -120.481539 ±5.12m
Lompoc, CA 93436
12" HDPE, north
Wood Dump Inspection

Photo 11: Northeastern Concrete V-Ditch – concrete in good condition, partially obstructed by soil and vegetation (facing northwest)

Photo 12: Northern 12" HDPE Drainpipe Outlet – pipe in good condition with minimal debris buildup at outlet (facing southwest)



Tue, 29 Nov 2022
12:25:07
+34.676762 -120.481539 ±5.12m
Lompoc, CA 93436
Reinforced concrete inlet structure and 24"
pipe, north
Wood Dump Inspection



Tue, 29 Nov 2022
12:14:36
+34.676524 -120.481055 ±4.91m
Lompoc, CA 93436
VP-01
Wood Dump Inspection

Photo 13: Reinforced Concrete Inlet Structure and 24-inch Corrugated Metal Pipe – all features in good condition and unobstructed (facing southwest)

Photo 14: WD-VP-01 in good condition (facing west)



Photo 15: Northern Overside Drain Inlet and Wingwall – concrete in good condition (facing northeast)



Photo 16: Northern Overside Drain Inlet obstructed by vegetation (facing northeast)



Photo 17: WD-VP-04 in good condition (facing south-southeast)

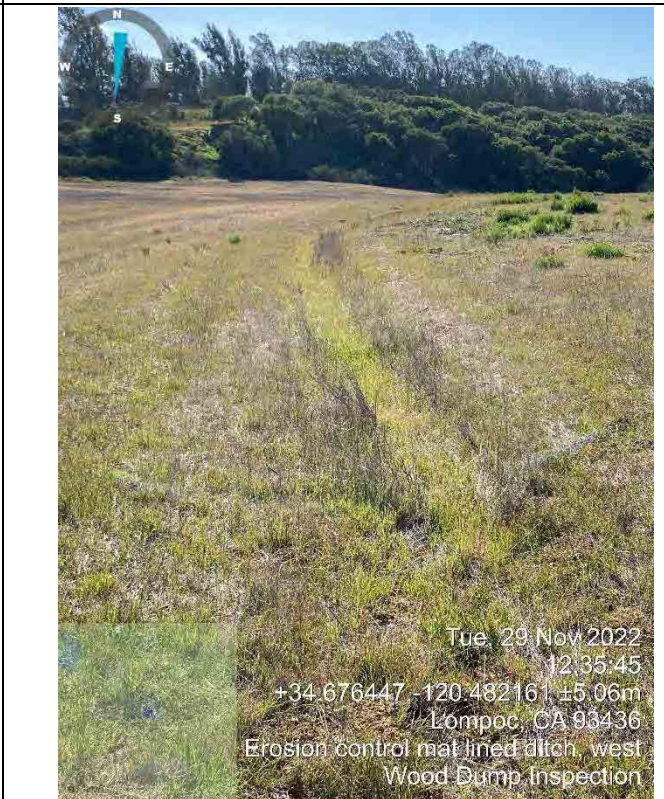


Photo 18: Western Erosion Control Lined Ditch - smooth grade and no signs of erosion rills (facing south)



Photo 19: Western Erosion Control Lined Ditch – woody vegetation obstructing ditch at southern end (facing southwest)

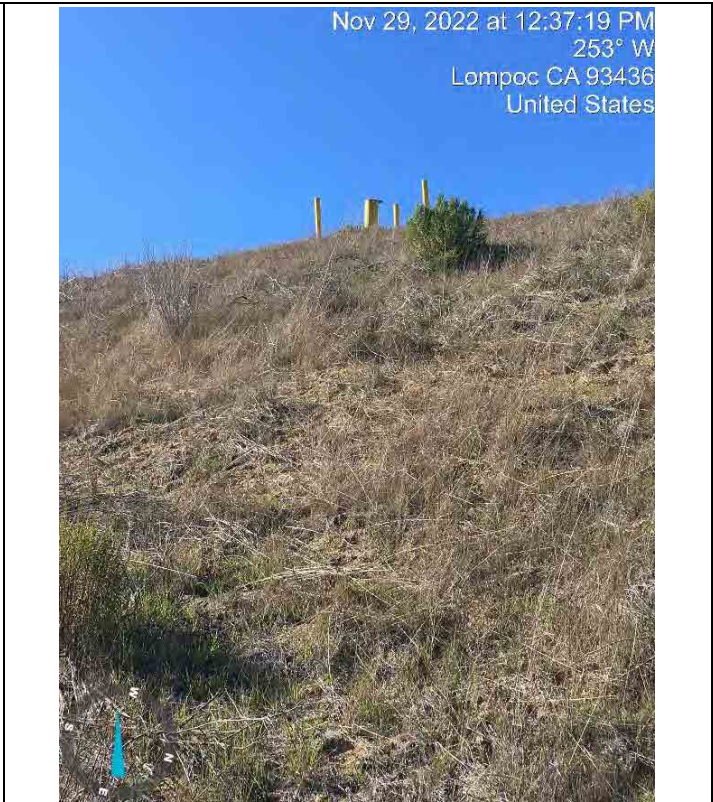


Photo 20: Western slope leading up to WD-MW-04 well vegetated (facing west-southwest)

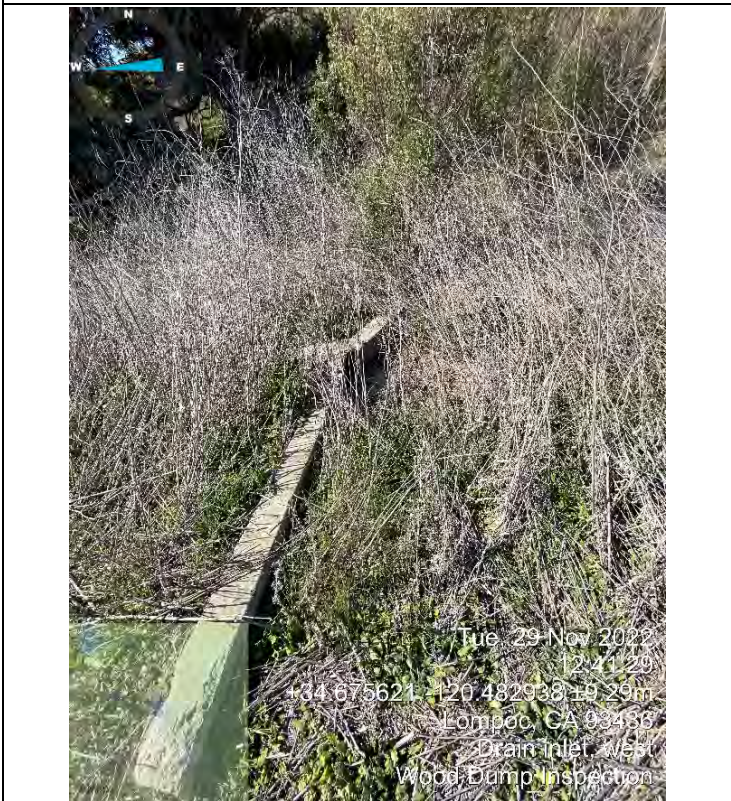


Photo 21: Southwestern Overside Drain Inlet and Wingwall – concrete in good condition, but inlet area is overgrown with vegetation (facing west)



Photo 22: Southwestern Overside Drain Inlet – pipe is in good condition with no signs of obstruction at the opening (facing south-southwest)



Tue, 29 Nov 2022
12:49:02
+34.675425 -120.483138 ±6.03m
Lompoc, CA 93436
Drain inlet, north
Wood Dump Inspection



Tue, 29 Nov 2022
12:51:03
+34.675342 -120.483056 ±5.19m
Lompoc, CA 93436
24" metal pipe, south
Wood Dump Inspection

Photo 23: Southwestern Overside Drain Outlet – pipe is in good condition, but the opening is obstructed by vegetation and soil buildup (facing north)

Photo 24: Southern Outlet of 24" Corrugated Metal Pipe – an area near the outlet is overgrown with woody vegetation, but the pipe is in good condition and unobstructed (facing northeast)



Tue, 29 Nov 2022
12:51:36
+34.675343 -120.483056 ±5.19m
Lompoc, CA 93436
12" HDPE pipe, south
Wood Dump Inspection



Tue, 29 Nov 2022
12:52:39
+34.675269 -120.483119 ±13.12m
Lompoc, CA 93436
VP-03
Wood Dump Inspection

Photo 25: Southern 12" HDPE Pipe Outlet – pipe in good condition and unobstructed (facing northeast)

Photo 26: WD-VP-03 in good condition and unobstructed (facing south)



Photo 27: Southern Concrete V-Ditch – concrete is undamaged but obstructed by soil and vegetation buildup (facing west)

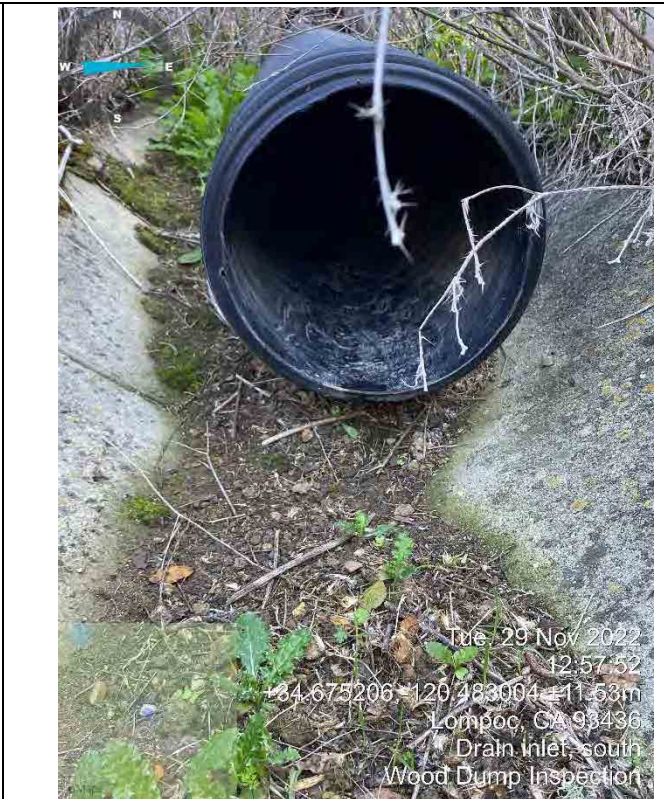


Photo 28: Southern 12" HDPE Pipe Outlet Within V-Ditch– pipe in good condition and unobstructed (facing east)



Photo 29: Southern 12" HDPE Pipe Inlet– pipe in good condition, well anchored, and unobstructed (facing southwest)

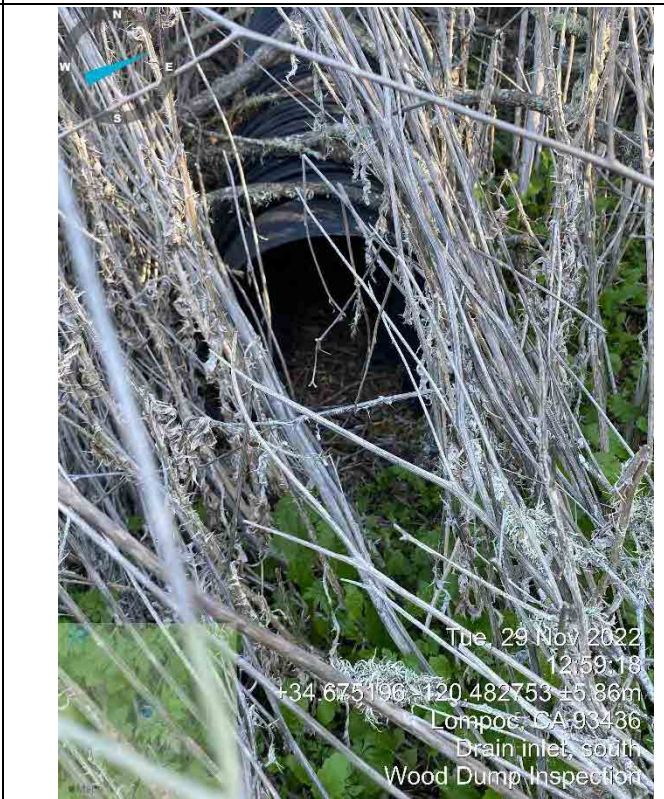


Photo 30: Southern 12" HDPE Pipe Outlet– pipe in good condition but obstructed with vegetation and debris buildup (facing northeast)



Photo 31: Southern Oversight Drain Inlet and Wingwall unobstructed and undamaged (facing northwest)

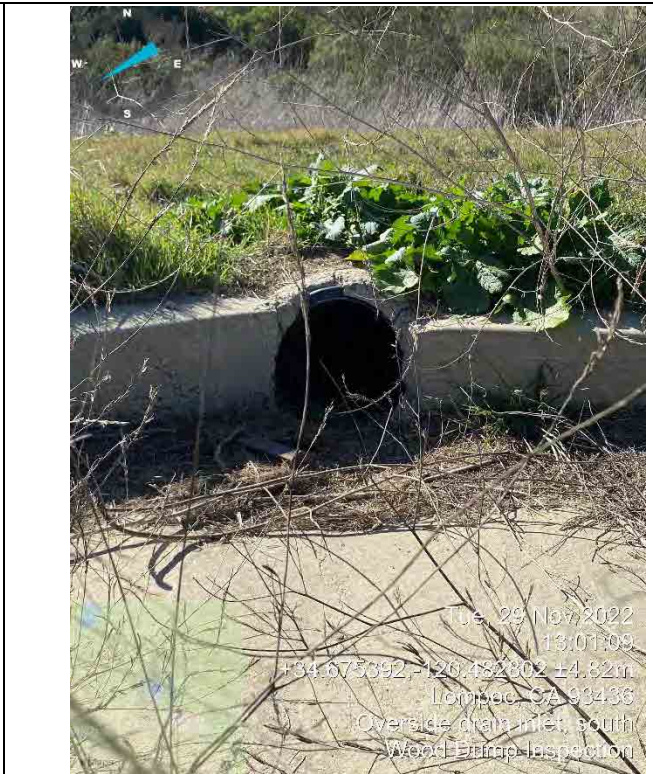


Photo 32: Southern Oversight Drain Inlet and Concrete Apron unobstructed and undamaged (facing southwest)



Photo 33: Southern 12" HDPE Pipe Inlet - pipe in good condition but obstructed with vegetation and debris buildup (facing southwest)

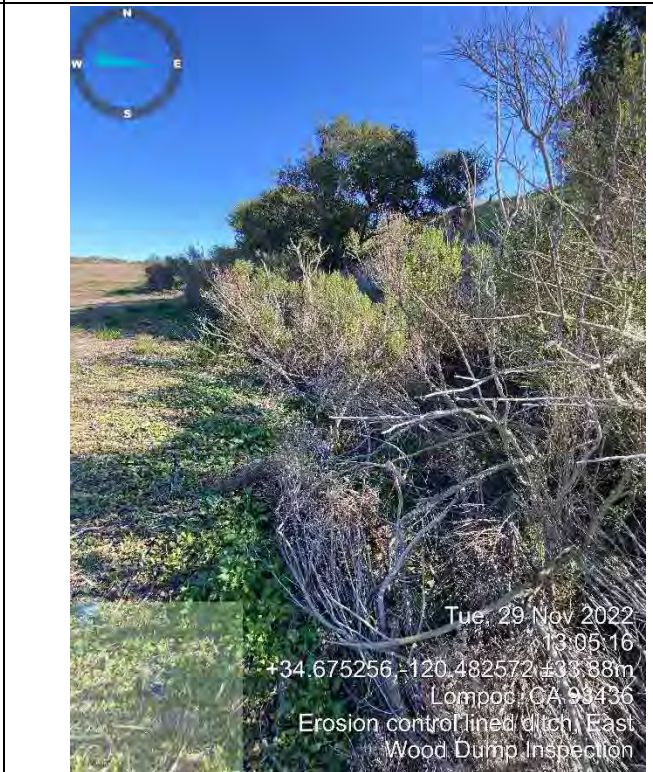


Photo 34: Eastern Erosion Control Lined Ditch - southern portion of the ditch is overgrown with woody vegetation (facing east)

Appendix E. Responses to Regulator Comments

Review Comments						
Project		Environmental Long-Term Monitoring, Former U.S. Disciplinary Barracks (USDB)			Contract No.	W912PL-18-D-0044
Document		Draft Final 2022 Annual Inspection Report, Wood Dump and Former Army Landfill			Date	April 2023
Comment Number	Commenter	Page(s)	Section	Paragraph	Comment	Response
1	BL	6	3.1 & 3.2	General	Central Coast Water Board defers to Santa Barbara County of Environmental Health Services (SBCEHS) for evaluation of landfill cover integrity, and support recommendations regarding any necessary corrective measures. We encourage all stakeholders to work cooperatively to maintain the landfill as required by relevant regulations.	Acknowledged.
2	YY	6	3.2	1	<p>As I was pointed out by Bryan Little regarding the disagreement between Environmental Health Services (EHS) and the Bureau of Prisons (BoP) on the condition of the landfill (3.2 Former Army Landfill), I would like to share what regulations the operator has to follow and address what actions need be taken.</p> <p>In regards to the condition of the final cover, I observed many animal burrows sporadically over the surface and final cover without having adequate vegetation during the previous inspection. The lack of vegetation may be a seasonal thing, however, erosion control shall be in place at all times. I have not visited the Former Army Closed Landfill after the recent severe storm, however, I expect to see some erosion issue more or less considering the fact that there have been some significant erosion issues at another closed landfill.</p> <p>As you probably know, entropy is not on our side, the operator shall monitor the closed landfill periodically and maintain it as needed (ex. planting vegetation, bait for rodent control and etc)</p> <p>(a) Final Cover Requirements</p> <p>(D) Vegetation Maintenance — for a final cover utilizing a vegetated erosion-resistant layer [under (a)(3)(A)1.], a plan for maintaining this vegetative cover, including fertilization, irrigation, elimination of species that violate the rooting depth limit [of (a)(3)(A)1.d.], replanting, and irrigation system maintenance.</p> <p>(3) Erosion-Resistant Layer — The low-hydraulic-conductivity layer of (a)(2) shall be directly overlain by an erosion-resistant layer, as follows.</p> <p>a. contains no waste (including leachate);</p> <p>b. is placed on top of all portions of the low-hydraulic-conductivity layer described in (a)(2);</p> <p>c. is capable of sustaining native, or other suitable, plant growth;</p> <p>d. is initially planted — and is later replanted as needed to provide effective erosion resistance — with native or other suitable vegetation having a rooting depth not exceeding the depth to the top of the low-hydraulicconductivity layer described in (a)(2). For any proposed vegetative cover, the discharger shall propose a species mix which harmonizes with the proposed post-closure land use, and which requires as little long-term maintenance as feasible by virtue of its tolerance of the vegetative layer’s soil conditions (e.g., the presence of landfill gas), its resistant to foreseeable adverse environmental factors (e.g., climate, disease, and pests), its rapidity of germination and growth, its persistence and ease of self-propagation, its high percentage of surface coverage (sufficient to prevent surface erosion), and its minimal need for irrigation and maintenance;</p>	Acknowledged. The BCT is assessing the necessary maintenance and repair work for the site.

Comments Provided By	Name	Department/ Organization	Date	Email Address	Phone
BL	Bryan Little	CCRWQCB	February 14, 2023	Bryan.Little@waterboards.ca.gov	(805) 549-3704
YY	Yosuke Yamada	SBCEHS	February 14, 2023	YYamada@sbcphd.org	(805) 346-7131

Attachment 2:
January 2023 Wood Dump Erosion Photos



Photo 1: Overview of erosion observed at the north side of the Wood Dump Area. January 2023



Photo 2: Close-up view of erosion on slope at the Wood Dump Area. January 2023