



Working for a future without landfills...

April 5, 2013

Regional Water Quality Control Board
Central Coast Region
895 Aerovista Place, Suite 101
San Luis Obispo, California 93401-7906

Attention: Mr. Martin Fletcher, P.E.

DRAFT WASTE DISCHARGE REQUIREMENTS / MONITORING AND REPORTING PROGRAM
CRAZY HORSE CLASS III CLOSED LANDFILL
MONTEREY COUNTY, CALIFORNIA

The Salinas Valley Solid Waste Authority (SVSWA) appreciates the diligent and thorough work of the Regional Waste Quality Control Board. The Draft Waste Discharge Requirements (WDR) and the Monitoring and Reporting Program (MRP) are very complete and requires only little comment.

Please accept the following comments.

A. Draft Waste Discharge Requirements

1. Page 2, Paragraph 9. Regarding reference to the Salinas Disposal Service, they entered into a franchise agreement with the City beginning in 1950 which included the operation of the landfill.
2. Page 3, Paragraph 13. Most of the septic tanks were removed from the former residential properties. In May 2008, the SVSWA discovered and removed an additional septic tank from the Plescia property.
3. Page 14, Top paragraph. Please replace the following sentence, "Since 1998, total VOC concentrations in A-12 (located in an area downgradient of the injections) have decreased from approximately 180 µg/L to approximately 35 µg/L in 2012." The suggested replacement language could read, "In 2007/2008, a bioremediation array was placed in the vicinity of A-12. Since 2008, total VOC concentrations in A-12 (which represents an area downgradient of the injections) have decreased from approximately 180 µg/L to approximately 35 µg/L in 2012".
4. Page 15, Paragraph 51. The wells are designated by the name of the property owner. The Burton well should be updated to read the Reich Well.
5. Page 20, Paragraph 66. There are fourteen (14) sampling locations; GW-2 and GW-8 to GW-20. In 2010, SVSWA installed GW-18, GW-19, and GW-20.
6. Page 23, Paragraph 23, subparagraph e. Please cite the Monterey Bay Unified Air Pollution Control District Permit TV53-01 instead of TV32-02.

B. Draft Monitoring and Reporting Program.

1. Page 7, Table 2, Note 2. Please consider replacing the note with "All routine metals shall be filtered prior to laboratory analysis. Samples collected for COC metals shall not be filtered" The cost to field filter groundwater samples would increase the Crazy Horse Landfill monitoring cost by about \$10,000 per year. The cost over the next 30 years is high. In order to reduce costs associated with filtering, SVSWA proposes a study to compare the results of samples filtered in the field with duplicate samples filtered in the laboratory. The final method would be documented in the site's Sampling and Analysis Plan.
2. Page 8, Table 3, Note 3. Please replace Note 3 with "Samples collected for COC metals shall not be filtered." Regarding the Constituents of Concern (COCs), 40 CFR Part 258 - Appendix II says that the COCs should be tested for total metals and that the sampling should not be filtered.

Again, we appreciate the comprehensive approach towards assuring a program is in place to assure that the public health and the environment are protected.

Should you have any questions, please do not hesitate to call at (831) 775-3000.

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick Mathews". The signature is fluid and cursive, with a long horizontal stroke at the end.

Patrick Mathews
General Manager