

**Staff Response To Comments
Folsom Corporation Yard Landfill Tentative WDRs
Sacramento County**

The following are Central Valley Regional Water Quality Control Board (Regional Water Board) staff responses to comments submitted by interested parties regarding the tentative revised WDRs for the Folsom Corporation Yard Landfill. Public comments regarding the proposed permit renewal were required to be submitted to the Regional Water Board office by 5:00 p.m. on 23 June 2008 in order to receive full consideration.

The Regional Water Board received comments regarding the proposed WDRs from the following:

- Laurie Laurent, resident of Natoma Shores Subdivision
- Alan Wade, member, Save The American River Association (S.A.R.A.)
- Dean Handy, resident of Natoma Shores Subdivision and member, We Are Totally Environmentally Realistic (W.A.T.E.R)
- City of Folsom (Discharger)

The submitted comments were accepted into the record, and are summarized below, followed by Regional Water Board staff responses.

Staff Response to Public Comments - Laurent, Wade and Handy

1. Discharger Compliance

General Comment - Given the discharger's history of water quality violations, the discharger cannot be relied upon to comply with their WDRs.

Comments Received:

Email from A. Wade - 6/18/2008 13:44

Excerpts from comments:

- a. *Your tentative WDO appears to have been prepared in blissful ignorance of the deserved reputation of the subject "Discharger" -- the City of Folsom,--as a known, documented, and unrepentant scofflaw in its attitude and approach toward the precious resource which flows through its boundaries. . .*
- b. *This Order, if adopted, is a travesty against the body politic. If you adopt it, you will be violating the Clean Water Act by turning over to a local government with a long history as a scoff-law the opportunity to further pollute the waters of the People of the State of California in pursuit of their own expansionist goals. SARA is opposed to the granting of this Order because Folsom city officials have made it abundantly clear by their past behavior that they will simply ignore any rules or regulations imposed by the Regional Water Quality Control Board. . .*
- c. *No. 9(p. 30) calls for the Discharger to "take all reasonable steps to minimize any*

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adverse impact to the waters of the State resulting from non-compliance with this Order . . . This is unadulterated nonsense. Should the fox be expected to guard the hen house? . . .

- d. *We cannot imagine that your Board, given the many years of history you have had with this particular discharger since the January 2000 spill of 750,000 gallons of raw sewage into Lake Natoma through Willow Creek, would seriously expect that they (i.e., Folsom) would monitor and report their own violations. Any such plan is totally unacceptable, and would most certainly call for a restraining order.*

Response:

Staff does not recommend any change in response to this comment. The discharger is not in violation of its WDRs and does not have a history of noncompliance with its landfill WDRs. The discharger has voluntarily elected to clean close the landfill, and the proposed clean closure WDRs are appropriate to prescribe requirements for the discharge. Removal of the landfill wastes, which are believed to be the primary source of pollution at the site, should result in improved water quality.

2. Project Documents

General Comment – Documents needed for commenting on the tentative WDRs have not been made available to the public, or are incomplete. The public has not had an opportunity to respond to the tentative WDRs and/or prepare for the Board meeting.

Comments Received:

Emails from L. Laurent – 6/12/2008 15:58, 6/12/2008 17:37, 6/16/2008 14:11, 6/20/2008 12:07, 6/12/2008 15:58

Excerpts from comments:

- a. . . . *the city has still NOT provided information I have requested since the first public meeting in January 2008. I wish to know the bases for their cost estimates. . . . The public comment submission period ends in 10 days, and we still have NO INFORMATION detailing COST, basis for each estimate, funding source, and financial assurance. L. Laurent, 6/12/2008 15:58*
- b. *Clean Closure Plan INCOMPLETE. Applicant is required (b)(2) to provide an "accurate DETAILED cost estimate" for clean closure per CIWMB 21810 and SWRCB 21090 f. L. Laurent, 6/16/2008 14:11*

Response:

As explained in the response to Item 6 below, detailed clean closure cost estimates for the project were not required to prepare the tentative WDRs.

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- c. *I examined the May 2008 Amended Report of WD/Clean Closure Work Plan at the Folsom Library. . . I was unable to copy any of the Appendix A, Figures, which contains much of the data required to understand the conclusions of the city's engineers. . . I went immediately to City Hall to request these copies, but was turned away by the city clerk's office because "it's lunchtime." L. Laurent, 6/12/2008 15:58:00 PM*

Response:

RWB staff emailed PDF copies of the Appendix A Figures to L. Laurent on 6/13/2008.

- d. *It would assist me and others to have access to a hard copy of the following documents which have not been placed at the public library, were not provided when I went directly to city hall, and which are necessary for the public to do a full evaluation of the Public Record for the Public Hearing . . .*
- (1) Folsom RFQ, FCYL clean closure: Request for Quote circulated to potential bidders for the FCYL clean closure project. . .;*
 - (2) Circulation plan for trucks and vehicles . . .;*
 - (3) Description of substrate and roadway surfaces . . .;*
 - (4) WRITTEN detail of all city Financial Assurance claims as they relate to the submitted Work Plan, evidence of the city's financial ability to complete the program and to button up the project in the event of unforeseen events stopping project;*
 - (5) Written information indicating any city claims with regard to EMERGENCY response for FIRE, EXPLOSION, Toxic material releases of any type . . .;*
 - (6) Topographic information sufficient to determine the importance of the . . . Mehrten Formation . . .*
- L. Laurent , 6/20/2008 12:07*

Response:

The tentative WDRs are based on preliminary construction plans included in the May 2008 Amended Report of Waste Discharge (RWD). The City has since submitted final construction plans, specifications and drawings as part of the construction bid package. This bid package includes information regarding Items 1, 2, 3 and 5. Item 4 (financial assurances) is addressed in Provisions 6 through 8 of the tentative WDRs, which require that the Discharger provide updated cost estimates and financial assurances for the project. The City has also submitted a demonstration of existing financial assurances in response to comments on the tentatives. Topographic information regarding the Mehrten formation was included in the May 2008 RWD (Appendix C). Staff informed L. Laurent that the above information is available in the Regional Water Board files for public review.

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3. Hazardous Wastes

General Comment – The landfill accepted hazardous wastes not identified in the site investigation reports and not described in the WDR findings.

Comments Received:

Emails from L. Laurent – 6/12/2008 16:47, 6/12/2008 17:04

Email from A. Wade - 6/18/2008 13:44

Letter from D. Handy – 6/13/2008

Excerpts from comments

- a. *The TENTATIVE ORDER wording states . . . the contents dumped were "street cleaning and other wastes from the city." . . . Let's set the record straight, the city was censured as recently as the mid 1990's for chemical violations at the Corp Yard. All types of cleaners, degreasers, automotive products and excess were willfully dumped on the site, including the old dumps. If you want proof, look at the Water Monitoring logs which show every type of Hazardous Material from toluene to trichlorobenzene to dangerous heavy metals. We have witnesses who know it was city policy to dispose of hazardous materials by dumping on the site. Of course it's there, even if the statements say nay. L. Laurent, 6/12/2008 16:47.*
- b. *Because I still haven't been able to see a complete listing of materials found by Brown and Caldwell during their research I have decided to tell you more about what I know about the area that is the focus of this project. . . These are things that I am sure will be found to be in the area of the "Clean Closure" project . . . 1) Appliances . . . 2) Household Garbage/trash . . . 3) Dead animals . . . 4) Automobile waste 5) Yard waste . . . You will also find trash that came directly from the city corporation yard in this area. Some of this trash will include automobile parts and probably some liquids (such as motor oil and used gasoline) that were dumped in this area. D. Handy, 12 June 2008 letter*
- c. *Despite the City's repeated mantra that the Site is largely benign in content, the evidence to the contrary is overwhelming (see Health and Safety Plan prepared for the city by Brown and Caldwell, February, 2008). The chemical hazards identified as a part of the Plan for removal are hardly consistent with mere grass clippings and discarded foliage, and soil, or with reports from long-term residents of the materials dumped there over the years. A. Wade, 6/18/2008 13:44*

Response:

Nothing in the above descriptions of wastes that may be in the landfill support modification or denial of the tentative WDRs, which would regulate how wastes

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are removed, characterized and disposed of. For example, WDR Finding 6, which states "the landfill was not authorized to accept hazardous or liquid wastes," Is not inconsistent with the possibility that hazardous wastes may have been discharged to the landfill in household trash or by unauthorized dumping. Such contingency is reflected in the City's clean closure plans

4. Site Characterization

General Comment – The City has not conducted an adequate investigation of the nature and extent of wastes at the site.

Comments Received:

Emails from L. Laurent – 6/12/2008 17:37, 6/13/2008 13:26, 6/16/2008 14:11, 6/17/2008 15:06, 6/20/2008 12:07

Excerpts from comments:

- a. . . . *Over the major sewage ponds themselves, i.e. the deepest dumps, Brown & Caldwell did only two borings . . . If I had the Figures from Appendix A, I could overlay them and demonstrate that the ONLY BORINGS WERE PUT DOWN INTO THE SOIL BERM SEPARATING THE TWO PONDS. When I read the ***** marked conclusions that the dumps are "STILL PREDOMINATELY SOIL* 98% soil/2% trash" I was disgusted. Of course the berms are soil. What we have here is very questionable research.* L. Laurent, 6/12/2008 17:37

Response:

Test pit logs and photos from the landfill area indicate that the excavated waste consisted of soil mixed with organic matter, trash, and debris, consistent with the description in Finding 8 of the WDRs. Some percentage of the soil fraction may have come from decomposition of organic wastes and/or soil discharged to the landfill with other wastes or applied as daily cover.

- b. *Moreover, the city has not abided with Title 27 to characterize the contents of the materials outside and underneath the old sewage pond dumps. . . . We now must admit there is waste BENEATH the existing Closed dumps and liner, because we now have the testimony of eye-ball witnesses to this fact. Moreover, the city admission of the third dump must be investigated. The city is IMO required to abide by the Title 27 regulations regarding a waste disposal unit which is not "overflow" in the vicinity of the municipal dump. If you look at the site, there is potentially a very large amount of waste in the large UFA/TOE.*

L. Laurent, 6/17/2008 15:06

Response:

The Discharger is proposing clean closure the main landfill and uncontrolled fill

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areas as a corrective action measure under Title 27. Geotechnical investigations of these areas conducted by the discharger in 2000, 2006, and 2008 have adequately characterized the nature and extent of wastes for this purpose, as noted in Finding 8 of the WDRs. The WDRs require postclosure groundwater monitoring to monitor the effectiveness of clean closure as a corrective action and require that the discharger submit an amended RWD for further corrective action measures in the event that existing corrective action measures are not adequate.

- c. . . . *per Surveyor's signage waste on city property lies OUTSIDE the FCY fence. The city must CLOSE this unauthorized fill area pursuant to Title 27. Investigation of the old sewage plant pipes which carry liquids from the old sewage plant directly to the American River. L. Laurent, 6/16/2008 14:11*

Response:

The discharger recently investigated this area as directed by the CIWMB, and has included it in the finalized work plans. The landfilled portion will be excavated and graded in accordance with project plans. Finding 8 of the WDRs has been modified to include the recent investigation of this area.

- d. *Re . . . labelling all Corp Yard uses clearly. City did not indicate its encroachment on US Bur of Reclamation land where city operates its auto & mechanics operations. city did not indicate it STILL stores CREOSOTE materials, and has returned to practice of storing junk and vehicles, and metal and plastics on bare soil next to our homes. L. Laurent, 6/13/2008 13:26*

Response:

These alleged corporation yard activities are outside of the landfill unit area and are not relevant to clean closure of the landfill.

5. Landfill Closure

General Comment – The area outside of the main landfill (i.e., UFA) should be closed in accordance with a CIWMB approved closure plan rather than clean closed.

Comments Received:

Email from A. Wade - 6/18/2008 13:44

Excerpts from comments:

- a. . . . *monitoring wells placed outside the old sewage ponds may well be detecting toxic agents, thus underscoring the importance of a Closure Plan overseen by CIWMB, rather than jumping to "Clean Closure."* A. Wade, 6/18/2008 13:44

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Response:

Clean closure is a more effective corrective action measure than conventional closure because it involves removing, rather than merely covering, landfill wastes. Clean closure thus eliminates the source of pollution. Capping the main landfill has not resulted in any significant improvement in groundwater quality since 1996. Capping the UFA may not either. Staff therefore supports the Discharger's proposal to clean close both areas.

- b. *Even more critical to the safety of walkers, hikers, boaters, and other recreational users is the fact that the so-called UFA (Uncontrolled Fill Area) presents serious additional hazards—some known and some yet to be discovered-- and has never been subject to closure. This area abuts the busy bike trail directly below it in State Park lands . . . the City should be required to (meet) CIWMB Closure requirements for the UFA's outside the original sewage ponds. A. Wade, 6/18/2008 13:44*

Response:

Title 27 (Section 20430) requires that the Discharger implement necessary corrective action to address groundwater impacts from the landfill. The Discharger is proposing clean closure of both the main landfill and UFA as corrective action measures. Section 21090(f) of Title 27 includes water quality requirements for clean closure. The tentative WDRs implement appropriate requirements for the project in accordance with Title 27 regulations to protect water quality. Title 27 (Section 21810) also requires that the Discharger obtain clean closure approvals from the CIWMB and Local Enforcement Agency.

6. Project Costs & Financial Assurances

General Comment - The City has underestimated the cost of clean closure of the landfill and has not provided detailed clean closure cost estimates and financial assurances.

Comments received:

Emails from L. Laurent - 6/12/2008 16:15, 6/12/2008 16:29, 6/12/2008 17:04, 6/13/2008 13:17, 6/13/2008, 3:47, 6/13/2008 13:55, 6/16/2008 14:26, 6/17/2008 15:06, 6/17/2008 15:10

Emails from A. Wade - 6/18/2008 13:44, 6/18/2008 13:44

Excerpts from comments:

- a. *The city wants the RWQCB to believe that a project their own engineer (with Brown & Caldwell engineers) estimated to be \$8 Million in 1989 to 2000, is now going to cost a mere one to two million. This is so outrageous as to require the city*

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of Folsom to demonstrate their ability to fund this closure. . . The City of Folsom's budget outlook has been impacted by what I see as a perfect storm of economic factors . . . L. Laurent, 6/12/2008 16:29

- b. *I am calling for a FULL REPORT OF ESTIMATED COSTS, COST BASES USED, including evidence of current validity with high diesel costs rising daily, HARD PROOF OF MONIES DEPOSITED for all work necessary to ensure the protection of the American River, Lake Natoma Shores residents, and the Federal Lands at the American River, as well as the State Parks which are needed more in these times. L. Laurent, 6/13/2008 13:47*
- c. *No. 48 (p.11) estimates a total amount of 73,000 cubic yards of waste material to be removed. Can the Board verify/confirm that the City's cost estimates are realistic in the light of, for example, steep increases in the cost of diesel fuel? Do the estimates include allowance for unpleasant surprises in the kinds of materials unearthed and removed? L. Laurent, 6/18/2008 13:44*

Response:

As described in Findings 2 and 31 of the tentative WDRs, the landfill has already been closed (i.e., capped and graded) in accordance with Title 27 regulations. Neither Title 27 nor the WDRs require financial assurances for clean closure where the landfill has already been closed, except as necessary to repair the final cover in the event that work is suspended for a significant period of time (i.e., greater than six months) or is not completed. Language covering this contingency is included in Findings 62 and 63. The City has provided the estimated costs of such repairs and demonstrated adequate financial assurances for such repairs in an enterprise account. No other detailed cost estimates are necessary for clean closure. The City has increased its estimate of the costs of clean closure to \$2.5 million since issuance of the tentatives, however. Finding 31 has been revised to reflect this amount.

7. Storm Water

General Comment – The storm water and site winterization requirements in the tentative WDRs are inadequate or not enforceable.

Comments Received:

Email from L. Laurent – 6/16/2008 14:44

Email from A. Wade - 6/18/2008 13:44

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Excerpts from comments:

- a. *No. 59 (p 13) assumes an optimistic date for completion of the work—one “season” of work. Has the City provided for the suggested “winterization” plan?* A. Wade, 6/18/2008 13:44

Response:

Staff disagrees. Storm Water Specification D.5 of the WDRs requires that the discharger implement site winterization measures by 31 October of each year. The WDRs do not require that the Discharger submit a winterization plan for approval, since most of the winterization measures will also be required as best management practices under the Storm Water Pollution Prevention Plan developed under the General Storm Water Permit for Construction Activities required per Storm Water Specifications D.1 and D.2.

- b. . . . *City ownership extends outside the chain link fence, and the ledges of fill. This is where the storm drains, collecting all the local run off, drain onto this UFA dump 3/Toe area. FYI, the filters in the large storm drain have never been changed since placement. The city does not maintain the required storm drain system maintenance fund account.* L. Laurent, 6/16/2008 14:44

Response:

The portion of the UFA area outside of the perimeter fence will be included in the clean closure project as noted in Comment 3.d above. Storm water best management practices will therefore need to be implemented in the area during project construction under the General Storm Water Permit. The area will also need to be backfilled and graded for drainage as part of the clean closure work plan.

- c. *Detailed requirements for post-closure work are specified on pp.19-20. Who/what will do the extensive monitoring required? . . . The City of Folsom can hardly be expected to equip itself with the required resources for effective monitoring, nor would they have the incentive to do so absent the threat of severe legal and fiscal consequences.* A. Wade, 6/18/2008 13:44

Response:

The monitoring and reporting program (MRP) in the tentative WDRs requires that the discharger conduct facility monitoring, including regular maintenance inspections, inspections after significant storm events, and inspections for the purpose of site winterization. The failure to conduct these activities would be a WDR violation subject to possible enforcement action.

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8. Groundwater Monitoring

General Comment – How can successful clean closure be measured without regular monitoring?

Comment Received:

Email from A. Wade - 6/18/2008 13:44

Excerpts from comments:

- a. *No. 42 defines “successful clean closure” as a process that results in no further threat to water quality. If testing is not done on a periodic and regular basis, how will success be determined?* A. Wade, 6/18/2008 13:44

Response:

Section 20430(f) of Title 27 requires a “proof period” during which the discharger must demonstrate that concentrations of landfill constituents detected in groundwater have been reduced to concentration limits (e.g., background levels) prior to terminating corrective action measures. At least eight sampling events per year are required at each monitoring point and the demonstration must be made for at least one year. After successfully completing the proof period, the discharger may terminate corrective action measures, but may be required to continue detection monitoring if still within the compliance period specified in Section G.5 of the MRP. The proof period requirement is incorporated into Monitoring Specification G.27 of the tentative WDRs.

9. Surface Water Monitoring

General Comment – Given its proximity to Lake Natoma, constituents from the landfill may be entering the lake, or may enter the lake in the future. Monitoring of the lake should be required to protect its unusually strict water quality standards as a federally designated Wild and Scenic River.

Comments Received:

Email from A. Wade - 6/18/2008 13:44

Excerpts from comments:

- a. *The Clean Closure to which your report refers is sited only a few feet above Lake Natoma. . . .*

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- b. *This river is far more than merely a “tributary to the Sacramento River” (No. 15, p. 3.) It is a federally designated Wild and Scenic River. That status means that, because of its many beneficial uses, it must be held to unusually strict requirements for water quality standards. . . . While that report referred primarily to fecal coliform levels, SARA believes that equally stringent standards for other toxic agents should be enforced. . . .*
- c. *No. 29 of the WDO (p.5) indicates that pond liners were breached in several places. Is there any assurance that such breaches do not result in river water degradation, or will not do so in the future? . . .*
- d. *No. 36 (p.7) indicates that VOC’s (volatile organic compounds) have been “intermittently detected” at the site’s test wells, but there is no indication of testing of the river water itself for these same compounds.*

Response:

Given the concentrations of landfill constituents detected in groundwater at the site, the distance to the lake (about 600 feet), and likely attenuation and dilution factors, the landfill is considered a low threat to the lake. Further, removal of the landfill should adequately address any such threat. Discharge limits and surface water monitoring requirements for the lake are therefore not necessary and have not been included in the WDRs.

10. Land Use

General Comment – Any plans for development of the site after clean closure is completed should consider the overburdened city infrastructure.

Comments Received:

Email from A. Wade - 6/18/2008 13:44

Excerpts from comments:

- a. *No. 3 (p. 27) refers to strictures to be placed on a succeeding owner. Any plans for construction on this site, even should the clean closure be successfully completed, which require water and sewage hookups, should take into account the existing overburdened infra-structure of the City, in particular the under-built and overburdened 27 inch sewage line currently relied upon for discharges from 15,000 prisoners, all of the city north of the American River and all of the pre-1992 city. A. Wade, 6/18/2008 13:44*

Response:

The referenced provision, Reporting Requirement H.3, prescribes notification and

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transfer requirements for any proposed change in ownership or responsibility for construction or operation of the landfill. Once the landfill is removed and clean closure is approved, this provision will no longer be relevant. After successful completion of the proof/compliance period, the WDRs may be rescinded and, if rescinded, would no longer restrict the land use.

Staff Response to Discharger Comments – City of Folsom

Excerpts From Comments Received:

1. *Page 1, Finding 4: . . . The Limit of Work (e.g., excavation and grading activities) for the project extends past the fence line in the southwest portion of the property, but remains within the property boundary. . .*

Attachment B of the tentative WDRs has been revised to reflect this change.

2. *Page 4, Finding 22: We are not aware of a recorded seismic event of 7.0 on the Richter scale for the Bear Mountain Fault Zone. Please provide the reference.*

This reference was a typo and has been revised to “5.8” to reflect the 1975 earthquake that occurred in Oroville (approximately 75 northwest of the site) in the same fault system.

See http://earthquake.usgs.gov/regional/states/events/1975_08_01.php

3. *Page 5, Finding 26: The Conceptual Site Model suggests infiltration into the perched zone is from surface infiltration during rain events, rather than from infiltration from the Laguna Formation (although this may have a minor contribution).*

The sentence has been revised to reference both surface infiltration and possible infiltration from the Laguna as sources of shallow groundwater.

4. *Page 8, Finding 38: The Conceptual Site Model suggests that deep groundwater monitoring well FCY-3 is not hydraulically connected to FCY-8 or FCY-9 which are in the perched zone. The discussion of spatial distribution of inorganic constituents in the perched zone should omit the reference to FCY-3.*

As noted in Finding 27, there may be some communication between the zones, despite the differences in piezometric head. Also, Finding 38 is not limited to the perched zone, since both wells FCY-8 and FCY-3 have similar concentrations of general minerals.

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5. *Page 29, Provision 8a: Requiring the delivery of certain project items two months prior to construction will delay the project considerably. For example, the construction contractor typically prepares a detailed construction schedule and sequencing plan two weeks prior to construction for review by the owner. Requiring this information two months prior to construction would delay the project by six weeks. . .*

Since construction documents for the project were submitted on 19 June 2008, this provision has been deleted. Finding 3 has also been modified to acknowledge submission of these documents.

6. *Page 29, Provision 8b: We request that the due date for the Post-Closure Maintenance Plan (PCMP) be extended to January 31, 2009 since several other deliverables (as-built plans, Clean Closure Results Report, etc.) are due within two months after completion of construction.*

No change since the updated PCMP will provide the basis for updating financial assurances that may be necessary if the project extends into the wet season. The report should also not be difficult to prepare by the required 31 October 2008 due date.

7. *Page 2, Section C1 and Page 11, Table G.1: Based on 12 years of monitoring groundwater at the site, the following constituents of concern are not reasonably expected to be detected in groundwater and should be removed from the program: semi-volatile organic compounds (SVOCs), organophosphorous and organochlorine pesticides, chlorinated herbicides, and polychlorinated biphenyls (PCBs). In addition, monitoring for metals and volatile organic compounds (VOCs) should be limited to those analytes that have been detected previously.*

No change. Since the landfill is unlined and does not have a leachate collection and recovery system (LCRS), the quality of its leachate cannot be measured. Also, the landfill accepted some household waste, and only two five-year monitoring events have been conducted since the full COC list was added to the MRP in 2001.

8. *Page 4, Section C5: A compliance period that extends three years following removal of the landfill unit is excessive given that clean closure will remove the landfill waste.*

No change. Section 20410(c) of Title 27 states, in part:

“If the discharger is engaged in a corrective action program at the scheduled end of the compliance period . . . the compliance period shall be extended until the discharger can demonstrate that the Unit has been in continuous compliance with its Water Standard (under §20390) for a period of three consecutive years.”

Since landfill clean closure is being conducted as a corrective action measure, the

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compliance period cannot end any sooner than three years after removal of the landfill wastes. The compliance period includes the minimum one-year proof period required for termination of corrective action measures under Title 27.

9. *Page 5, Section D3: Corrective action monitoring proposed for the lower zone is inconsistent with Findings 38 and 40 in the Order. Intra-well monitoring is proposed for groundwater monitoring wells FCY-3 and FCY-7, but these wells are upgradient of the landfill and are not likely connected with the shallow perched zone immediately below the landfill.*

No change. As noted above, both zones have similar concentrations of general minerals and communication between the zones has not been ruled out. Intrawell monitoring of the lower zone is therefore appropriate to monitor water quality trends in response to landfill clean closure.