

**Regional Water Quality Control Board
Central Valley Region
Board Meeting – 8/9/10 June 2011**

**Response to Written Comments for City of Clovis
City of Clovis Municipal Solid Waste Facility
Fresno County
Tentative Waste Discharge Requirements**

At a public hearing scheduled for 8/9/10 June 2011, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) will consider adopting waste discharge requirements for construction and operation of the City of Clovis Municipal Solid Waste Facility which contains one waste management unit comprised of the following: 1) an inactive unlined waste management cell covering approximately 27 acres from which all waste have been removed; 2) a clay-lined waste management unit adjacent to the eastern edge of the unlined unit covering approximately eight acres; and 3) a 21-acre waste management unit adjacent to the eastern edge of the clay-lined unit constructed using an engineered alternative composite liner design. This document contains responses to comments received from interested parties regarding the proposed Order circulated on 18 March 2011. Written comments from interested parties were required by public notice to be submitted to the Central Valley Water Board by noon on 21 April 2011 to receive full consideration. Comments were received by the due date from:

1. City of Clovis, Public Utilities Department

The comments are summarized below, followed by Central Valley Water Board staff responses.

CITY OF CLOVIS, PUBLIC UTILITIES DEPARTMENT

COMMENT 1: Notice of Public Hearing, First Paragraph - The inactive unlined waste management unit covers 27 acres (26.55 acres), not 23 acres as stated. The existing clay-lined area covers 8 acres (7.80 acres), not 7 acres as stated. The waste management units with composite liners cover 21 acres (20.83 acres), not 22 acres as stated. The last sentence of the paragraph indicates that the proposed order revises the existing Waste Discharge Requirements (WDRs) to provide for the reconstruction of the unlined waste management cell. It should also state that the proposed order provides for the expansion of the waste footprint and construction of new waste management units east of the existing composite-lined units. Attached to these comments is a site plan from the Joint Technical Document that was submitted in 2006 showing all proposed cells at the facility.

RESPONSE: Changes have been made to the tentative WDRs and Information Sheet to reflect the correct information. WDRs finding No. 4 was revised to read: "Waste Discharge Requirements need to be revised to provide for the reconstruction of the unlined waste management cell with an engineered alternative composite liner system, construction of an expansion waste management unit east of the existing composite lined unit, and completion of the evaluation monitoring program."

COMMENT 2: WDRs Item 2 – See corrected acreages in comment #1 above.

RESPONSE: Finding No. 2 has been revised to read:

“The waste management facility contains one waste management unit comprised of the following: 1) an inactive unlined waste management cell covering approximately 27 acres from which all waste have been removed; 2) a clay-lined waste management unit adjacent to the eastern edge of the unlined unit covering approximately eight acres; and 3) a 21-acre waste management unit adjacent to the eastern edge of the clay-lined unit constructed using an engineered alternative composite liner design.”

COMMENT 3: WDRs Item 9 – There is also a public shooting range within 1,000 feet of the facility.

RESPONSE: Finding No. 9 has been revised to read:

“Land within 1,000 feet of the facility is used as open pasture and a public shooting range.”

COMMENT 4: WDR, Item 10 – The average pan evaporation at Friant Government Camp from 1948 to 2002 was 79.8 inches, not 35.9 inches as stated.

RESPONSE: Finding No. 10 has been revised to read:

“The facility receives an average of 14.5 inches of precipitation per year as measured at the Friant Government Camp Station. The average pan evaporation from 1948 to 2002 was 79.8 inches as measured at the same station.”

COMMENT 5: WDR, Item 57.c – The word “textured” has been omitted from the description of the HDPW geomembrane.

RESPONSE: Finding No. 57.c has been revised to read:

“Single-sided textured 60-mil high density polyethylene (HDPE) geomembrane;”

COMMENT 6: WDR, Financial Assurance Review – The due dates for the Annual Review of Financial Assurance for corrective action and for closure and post closure maintenance is stipulated as July 30 of each year. The City’s fiscal year ends on June 30, and it may not be possible to complete the surveys and necessary calculations and deposit the required funds into the appropriate accounts by July 30. We request that the due date for the annual review be September 30 instead.

RESPONSE: The dates contained in Provision G.12, G.13 and Task G for Financial Assurance Review have been revised to reflect the proposed changes.

COMMENT 7: Attachment A, Location Map – The location map is outdated and does not depict the entire facility. Attached to these comments is a copy of a vicinity map from the Joint Technical Document that depict the correct facility boundaries.

RESPONSE: Attachment A has been revised to reflect the location map provided.

COMMENT 8: Information Sheet, Third Paragraph – See corrected acreages in comment 31 above.

RESPONSE: The Information Sheet, third paragraph has been revised to read:

“The waste management facility contains one waste management unit comprised of the following: 1) an inactive unlined waste management cell covering approximately 27 acres from which all waste have been removed; 2) a clay-lined waste management unit adjacent to the eastern edge of the unlined unit covering approximately eight acres; and 3) a 21-acre waste management unit adjacent to the eastern edge of the clay-lined unit constructed using an engineered alternative composite liner design.”