

**Regional Water Quality Control Board
Central Valley Region
Board Meeting – 6/7/ December 2012**

**Response to Written Comments for County of Kern
China Grade Sanitary Landfill
Kern County
Tentative Waste Discharge Requirements**

At a public hearing scheduled for 6/7 December 2012, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) will consider adopting waste discharge requirements that revise the existing waste discharge requirements to provide for post-closure maintenance and to initiate a corrective action plan. This document contains responses to substantive comments received regarding the proposed Order circulated on 2 October 2012. Written comments from were required by public notice to be submitted to the Central Valley Water Board by noon on 2 November 2012 to receive full consideration. Comments were received by the due date from:

1. County of Kern

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

COUNTY OF KERN

COMMENT: The Discharger proposed four new findings for the Waste discharge Requirements that addressed the proximity of the landfill to an oil field, the dynamics of landfill gas migration, and the submission of a Corrective Action Plan.

RESPONSE: Finding No. 10 was modified to include information regarding the location of the waste management unit in the Kern Bluff Oilfield and Finding No. 38 was added to indicate that the Discharger submitted a Corrective Action Plan. No other changes were made based on the proposed new findings.

COMMENT: Finding No. 49 regarding the threat to water quality rating and the discharge complexity should be deleted for the following reasons:

- The categories are subject to change;
- We disagree with the ratings; and
- A group of stakeholders is working with the State Water Resources Control Board to modify the system.

RESPONSE: The Threat to Water Quality and Complexity ratings contained in Finding No. 49 represent the Central Valley Water Board's assessment of the threat and complexity of the discharge, given the current regulations under which these characteristics are evaluated. This finding reflects the Board's current

state of the waste management facility at the time the WDRs are prescribed. |
[S1] Finding No. 49 has not been modified.

COMMENT: Several comments were submitted suggesting minor corrections to findings in the Waste Discharge Requirements and requirements in the Monitoring and Reporting Program.

RESPONSE: The requested editorial changes in Finding Nos. 2, 23, 24, 45, 46, Attachments A and B, Monitoring and Reporting Program Section A, Section B.2.f, and Section B.2.h were all made as requested.

COMMENT: Monitoring and Reporting Program A.4.d: Standard observations should be conducted monthly throughout the year.

RESPONSE: Monitoring and Reporting Program A.4.d has been changed as requested.

COMMENT: Monitoring and Reporting Program B.1.d: This statement needs clarification.

RESPONSE: In Monitoring and Reporting Program B.1.d, “cumulative tabulated monitoring data” has been changed to “tabulated monitoring data detected during the reporting period”.

COMMENT: Monitoring and Reporting Program B.2.d: We do not believe it is necessary to include all historical monitoring data. Submitting all historical monitoring data in each annual report would be wasteful and cumbersome, particularly the added costs to store the additional paperwork.

RESPONSE: Monitoring and Reporting Program B.2.d requires the Discharger to include all historical monitoring data as a digital file, not as a paper copy. This requirement has not been changed.

COMMENT: Monitoring and Reporting Program B.2.i: We do not believe that updating the concentration limits in our annual monitoring reports is necessary.

RESPONSE: Water quality can change naturally with time. If concentration limits are not updated, monitoring results could become unrepresentative of the actual water quality. Monitoring and Reporting Program B.2.i (now B.2.g) has been changed to read: “Every fifth year, update concentration limits for each monitoring parameter at each monitoring well based on the new data set.”