

**Regional Water Quality Control Board
Central Valley Region
Board Meeting – 30/31 May 2013**

**Response to Written Comments for County of Tulare
Balance Rock Municipal Solid Waste Landfill
Tulare County
Tentative Waste Discharge Requirements**

At a public hearing scheduled for 30 and 31 May 2013, 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 postclosure maintenance and the implementation of a corrective action program. This document contains responses to substantive comments received from interested parties regarding the proposed Order circulated on 8 February 2013. Written comments from interested parties were required by public notice to be submitted to the Central Valley Water Board by noon on 12 March 2013 to receive full consideration. Comments were received by the due date from:

1. County of Tulare

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

COUNTY OF TULARE

- COMMENT:** The Discharger requested that the current range of depths to the first encountered groundwater elevation in Finding No. 21 of the Tentative Waste Discharge Requirements (Tentative WDRs), be changed from 6 to 65 feet to 12 to 72 feet below ground surface based on groundwater elevations measurements in April 2012.
- RESPONSE:** Finding No. 21 was revised to read: “Based on groundwater elevation measurements provided by the Discharger, historical groundwater elevations have ranged between 4,969 and 4,939 feet mean sea level (MSL) at background groundwater monitoring well M-3 and between 4,852 and 4,858 feet MSL at corrective action groundwater monitoring well M-8.”
- COMMENT:** The Discharger requests that vinyl chloride be removed from the list of volatile organic compounds detected in groundwater in Finding No. 33. The Discharger bases its request on the fact that vinyl chloride has only been detected in trace amounts.
- RESPONSE:** Since vinyl chloride has been detected in a Point of Compliance well at trace levels, it is a part of the record of waste constituents released to groundwater. Finding No. 33 was revised to read: “Volatile organic compounds (VOCs) that are not naturally occurring have been detected in groundwater along the Point of Compliance. The VOCs detected in groundwater are benzene, chlorobenzene, tetrachloroethylene (PCE), trichloroethylene (TCE), 1,1-dichloroethylene (1,1-DCE), 1,1,1-trichloroethane (1,1,1-TCA), 1,1-dichloroethane (1,1-DCA), cis-1,2-dichloroethene (cis-1,2-DCE), and 1,4-dichlorobenzene (1,4-DCB). Vinyl chloride has been detected at trace levels.”

COMMENT: The Discharger states that damages and defects to the final cover are monitored by visual inspections and by two moisture sensors installed beneath the geosynthetic clay liner (GCL) on the top deck of the final cover and not by surface emissions monitoring. The Discharger requests that Finding No. 45 be modified to remove surface emission monitoring of the final cover and include moisture sensor monitoring.

RESPONSE: Finding No. 45 was revised as requested.

COMMENT: The Discharger requests that Corrective Action Specification F.2 be omitted from the Tentative WDRs, since the information requested in this specification was already addressed in a work plan that was approved by Central Valley Water Board staff in a letter and memorandum dated 27 May 2008. Corrective Action Specification F.2 requires the Discharger to submit a report for Executive Officer approval that identifies calcium polysulfide (CaSx) by-products, includes the monitoring of CaSx by-products in conjunction with MRP R5-2013-XXXX, proposes analyses for the CaSx by-products, and the frequency of monitoring of the CaSx by-products.

RESPONSE: The requirements in Corrective Action Specification F.2 regarding CaSx by-product identification and monitoring have been discussed with the Discharger and Central Valley Water Board staff concurred with the Discharger's proposals. A corrective action program is formerly approved by the Central Valley Water Board by the adoption of waste discharge requirements and a monitoring and reporting program. No changes to Corrective Action Specification F.2 were made.

COMMENT: The Discharger requests that Corrective Action Specification F.3 be modified to change the 30 May 2014 date for the submission of a preliminary report that evaluates the CaSx by-product impacts to groundwater in addition to the efficacy of CaSx in remediating mercury and other metals in groundwater, to 14 November 2014. The Discharger states that it originally proposed submitting this report one year after injection of CaSx to groundwater. The Discharger references Finding No. 39 in the Tentative WDRs.

RESPONSE: Staff concurs with the Discharger's proposal that the preliminary report would be submitted one year following the injection of CaSx into groundwater. Corrective Action Specification F.3 and Provision G. Task No. 3 were changed to allow for the submission of the preliminary report on 14 November 2014.

COMMENT: The Discharger requests that the date of 28 February 2018 in Corrective Action Specification F.5, for the submission of an amended report of waste discharge to make changes to the corrective action program or propose an alternative corrective action be changed to 30 June 2018. The Discharger's basis for this request is that the 30 June 2018 submission date would allow for an additional groundwater sampling event during the first semiannual period of 2018.

RESPONSE: Corrective Action Specification F.5 and Provision G. Task No. 5 of the Tentative WDRs were revised as requested.