

Moody



Countywide Services Agency

Environmental Management
Department

Environmental Compliance Division
Elise Rothschild, Chief

Bradley J. Hudson, County Executive
Ann Edwards, Chief Deputy County Executive
Val F. Siebal, Department Director

County of Sacramento

April 19, 2013

John Moody
Central Valley Regional Water Control Board
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670

Dear Mr. Moody:

**SUBJECT: LEA COMMENTS ON TENTATIVE ORDER FOR FLORIN PERKINS
LANDFILL 4201 FLORIN PERKINS ROAD, SACRAMENTO – SWIS# 34-
AA-0180**

Background

The Environmental Management Department is the Local Enforcement Agency (LEA) for the California Department of Resources, Recycling and Recovery (CalRecycle). As such, the LEA enforces 14CCR and 27CCR regulations at solid waste facilities in Sacramento County.

You released a Tentative Order to revise the Waste Discharge Requirements (WDRs) for Florin Perkins Landfill. The Regional Water Quality Control Board (RWQCB) will consider adopting the revised WDRs at its meeting on May 30 and 31, 2013. The revised WDRs would incorporate and prescribe requirements for landfill closure and corrective action, including the installation of passive landfill gas controls (i.e., vents) at each unit as an interim corrective action measure; phased cover construction; and postclosure monitoring of landfill gas, groundwater, and surface water runoff.

LEA Comments

The LEA provides the following comments regarding the Tentative Order:

- 1) As you know, the LEA has provided review and comments on the revised draft Final Closure and Post Closure Maintenance Plan (FC/PCMP) and draft Landfill Gas Monitoring and Control Plan (LGMCP) for this facility. As noted in our plan review comments, the LEA acknowledges that the RWQCB is the lead agency for closure of this site. The LEA's comments therefore, have mostly been limited to the LGMCP, post closure land use, and issues that affect on-going compliance with State Minimum Standards for post closure maintenance.
- 2) As you know, the FC/PCMP and LGMCP are currently in draft form and to date, a response to the LEA's final round of comments on those plans have not been provided to the LEA by the owner or the owner's consultant.

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- 3) The city of Sacramento's Community Development Department circulated a Project Notification on April 3, 2013, describing the intention of the operator of the transfer station located on the landfill to add additional processing capabilities. The operator also seeks to expand the 10 acre operational area of the transfer station by an additional 1.5 acres to accommodate a proposed material sales yard for the sale of base rock, top soil, wood chips, colored mulch, and other landscape materials.
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Contact

If you have any questions regarding this letter, please contact John Lewis at (916) 876-7279.

Sincerely,



John Lewis
Environmental Specialist III
Solid Waste Program

JL:LT:jm

c: Nevin Yeates, CalRecycle