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April 25, 2013

RECEIVED

APR 29 2013

RWQCB-CVR
FRESNO, CALIF.

Mr. Dan Carlson, Senior Engineering Geologist
California Regional Water Quality Control Board
Central Valley Region
1685 E Street
Fresno, CA 93706

**RE: COMMENTS ON TENTATIVE WASTE DISCHARGE REQUIREMENTS,
VISALIA LANDFILL, TULARE COUNTY**

Dear Mr. Carlson,

This letter is in response to the Tentative Waste Discharge Requirements (WDRs) for the Visalia Landfill received by this office dated 27 March 2013. In the accompanying Notice of Public Hearing, it is stated that any comments or recommendations concerning the Tentative WDRs should be submitted to your office in writing by noon on 26 April 2013. Staff from the Tulare County Resource Management Agency, Solid Waste Division, have reviewed the Tentative WDRs and have the following comments:

Waste Discharge Requirements:

Finding No. 21 lists the alternative daily cover (ADC) materials used at the Visalia landfill as Airspace Saver geosynthetic blankets and shredded green waste. The County also uses a thin film degradable plastic film as ADC. Please add the thin film ADC material use to this Finding accordingly.

Finding No. 27 states in pertinent part, "*Monitoring data indicate that background water quality for first encountered groundwater has an EC ranging between 640 and 940 micromhos/cm with TDS ranging between 410 and 640 mg/l.*"

Staff review of the historical background water quality at the Visalia landfill found that the EC ranges between 170 and 1300 micromhos/cm and TDS ranges between 220 and 810 mg/l.

Please change the Finding accordingly.

Finding No. 28 states in pertinent part, "*The direction of groundwater flow...with an average groundwater gradient ranging between 0.003 and 0.005 feet per foot... . The estimated groundwater flow velocity for the upper alluvial...zone is approximately 2.0 feet per day. Groundwater flow in the lower alluvial groundwater zone ranges between...with an average groundwater gradient ranging between 0.005 and 0.006 feet per foot.*"

Waste Discharge Requirements (continued)

Staff review of data contained in the latest Self Monitoring Report (SMR) for the Visalia landfill for the 2nd Semi-annual period of 2012 shows that the direction of groundwater flow in the upper alluvial groundwater zone ranges between 0.001 and 0.002 feet per foot. Also, the SMR shows that the estimated groundwater flow velocity in the upper alluvial groundwater zone is approximately 1.1 feet per day. In addition, groundwater flow in the lower alluvial groundwater zone ranges between 0.004 and 0.008 feet per foot.

Please change the Finding accordingly.

Finding No. 38 has references to the date of July, 2000 in the latter part of the paragraph. The two references have the dates incorrectly shown as, "July 2,000".

Please correct the Finding accordingly.

Finding No. 39 states in pertinent part, *"Additionally, the First Semiannual Monitoring Report, 2012, stated that 4-methyl-2-pentanone, ... vinyl acetate, ... were detected in off-site lower alluvial groundwater monitoring wells."*

A review of the monitoring data and Table 3-4 of the said monitoring report shows that 4-methyl-2-pentanone and vinyl acetate were not detected in the off-site lower alluvial groundwater zone monitoring wells at the Visalia landfill.

Please remove methyl-2-pentanone and vinyl acetate from the finding.

Finding No. 79 states in pertinent part, *"The Discharge, on 10 September 2010, submitted an amended report of waste discharge that estimated the completion of the closure of Unit 1 between January and March 2014."*

The County anticipates that construction of the final cover of Unit 1 will begin in March/April 2014 and anticipates the construction duration to last approximately 18 months. This schedule is dependent on approval of final construction plans, specifications and the construction quality assurance manual.

The County requests that the following sentence be added at the end of the finding, *"The County anticipates that construction of the final cover of Unit 1 will begin in March/April 2014 and that construction of the final cover will last for a duration of approximately 18 months."*

Orders:

Construction Specification D.1. states in pertinent part, *“The Discharger shall submit...a design report for each expansion cell of Unit II that includes detailed plans, specifications, and descriptions for the ...system components.”*

Future phases of expansion in Unit II at the Visalia landfill may include construction of one or more cells in each phase.

The County requests the Specification be changed to read in pertinent part, *“The Discharger shall submit...a design report for each expansion cell Phase of Unit II that includes detailed plans, specifications, and descriptions for the ...system components.”*

Landfill Closure and Postclosure Maintenance Specification E.4. states, *“Closure activities shall be completed within **180 days** of the beginning of closure activities unless an extension is granted by the Executive Officer.”*

As stated previously, closure activities for Unit 1 are expected to last a duration of 18 months.

The County requests that the Specification be changed to read, *“Closure activities shall be completed within ~~180 days~~ **18 months** of the beginning of closure activities unless an extension is granted by the Executive Officer.”*

The Compliance Date of Corrective Action Provision I.E.6. states, *“Within 90 days of a determination or receiving written from the Central Valley Water Board of such a determination.”*

The County believes that the provision should be amended to read, *“Within 90 days of a determination or receiving written notification from the Central Valley Water Board of such a determination.”*

The Site Map shown as Attachment B is missing a label for groundwater monitoring well M-7C. Also, the arrow pointing to the entrance on Avenue 328 should point to a location approximately half way between landfill gas monitoring wells G-12 and G-13. Additionally, the Unit II cells should be labeled as follows:

Phase 1, Cell 1	Phase 2, Cell 6
Phase 2, Cell 2	Phase 2, Cell 7
Future Cell 3	Future Cell 8
Future Cell 4	Future Cell 9
Future Cell 5	Future Cell 10

Mr. Dan Carlson

Page 4

Monitoring and Reporting Program (MRP)

Groundwater Monitoring A.1.: Domestic and Agricultural Groundwater Supply Wells AG-10 and AG-13R at the bottom of page 2 are not sampled on a routine basis as they have never had a detection or trace detection.

Please remove them from the list of Domestic and Agricultural Groundwater Supply wells at the bottom of page 2 of the MRP.

Unsaturated Zone Monitoring A.2.: The first sentence in the second paragraph states in pertinent part, "*Unit II, Cell 1 was constructed with a pan lysimeter... .*"

There are four cells that have been constructed in Unit II to date. Please change the sentence to read in pertinent part, "*Unit II, Cells 1, 2, 6 & 7 were each ~~was~~ constructed with a pan lysimeters... .*"

The second column with the headings, "*Unit Where Sump is Located*" at the top of page 5 in **Leachate Monitoring A.3.** only describes where the sump is for Cell 1. Please add Cell 2 where the sump is also located at the West-Central Margin as well as Cells 6 & 7 where the sumps are located at the East-Central Margins of each cell. This would apply for both the primary and secondary sumps for each cell.

Table V – The USEPA method specified for Sulfide is shown as "*SM 4500-CN*". Please change to the appropriate SM 4500 method specific to Sulfide.

Information Sheet:

Please change the Information Sheet per the above accordingly.

The County appreciates the opportunity to comment on the Tentative Waste Discharge Requirements for the Visalia Landfill. If you have any questions or need clarification on any of our comments, please feel free to contact me at (559)624-7190.

Sincerely,



Brooks Stayer
Solid Waste Manager

cc: Joy Isaacson, CalRecycle
Ken Bowers, Tulare County HHSA – Environmental Health Division.