

Regional Water Quality Control Board
Central Valley Region

Response to Written Comments for
Tentative Waste Discharge Requirements
for
County of Tulare
Earlimart Municipal Solid Waste Landfill, Tulare County

This document contains the responses to written comments received from interested parties regarding the proposed tentative Waste Discharge Requirements (WDRs) for the County of Tulare, Earlimart Municipal Solid Waste Landfill, Tulare County for postclosure maintenance and corrective action. The Tentative WDRs, R5-2014-XXXX, were prepared to incorporate postclosure maintenance requirements and the approved corrective action program. Currently, WDRs Order 5-00-236 regulate the Facility.

The Tentative WDRs were circulated on 11 December 2013 for public comment, ending on 10 January 2014. A total of one letter/email was received from the County of Tulare and these comments are addressed below.

Comments submitted during the comment period were received from the following:

- A. Bryce Howard, County of Tulare, Solid Waste Department, 31 December 2013

RESPONSE TO COMMENTS

The proposed additional language in underlined and the proposed deletion of language is shown in ~~strikethrough~~ format.

Comment A.1:

Finding 24 states in pertinent part, "...The estimated gradient is approximately 0.0077 feet per foot..." Groundwater contour maps presented in the 1st Semi-Annual 2013 report show that the estimated groundwater gradients in the first and second quarters of 2013 were 0.0060 feet per foot. Please change the finding accordingly.

Response A.1:

Comment acknowledged. The recommended revisions will be made.

Comment A.2:

The last sentence in Finding 40 states, "The CAP was implemented by the Discharge October 2012." Please change the sentence to read, "The CAP was implemented by the Dischargeer in October 2012."

Response A.2:

Comment acknowledged. The recommended revisions will be made.

Comment A.3:

Finding 41 states in pertinent part, "The final cover consists of the following, in ascending order: a two-foot thick soil foundation layer, a geosynthetic clay liner (GCL), a geosynthetic drainage layer, and a two-foot thick vegetative soil layer." As the finding currently reads, it can be interpreted to imply that the geosynthetic drainage layer (GDL) is part of the final cover system on the entire site. Construction of the approved final cover system at the Earlimart landfill

incorporated GDL on slopes greater than 10% only, which are primarily the 3:1 perimeter side slopes. Please change the finding accordingly.

Response A.3:

Comment acknowledged. Finding 41 will be revised as follows:

The Discharger completed construction of an engineered alternative final cover system in 2011. The final cover system consists of the following, in ascending order: a two-foot thick soil foundation layer, a geosynthetic clay liner (GCL), a geosynthetic drainage layer (on side slopes greater than 10%), and a two-foot thick vegetated soil layer. Central Valley Water Board staff approved the final cover system construction quality assurance report on 2 April 2011.

Comment A.4:

The site map shows 17 landfill gas monitoring wells at the site. The approved December 2006 Final Cover/Postclosure Maintenance Plans for the Earlimart landfill eliminated the following landfill gas monitoring wells at the site from the landfill gas monitoring program during the postclosure maintenance period: G-1, G-2, G-3, G-8, G-9, G-13, G-14, G-15, and G-16. Please update the site map accordingly.

Response A.4:

Comment acknowledged. The site map will be revised to show only the landfill gas wells monitored as part of the postclosure monitoring program.

Comment A.5:

Please update the Information Sheet accordingly to incorporate any changes.

Response A.5:

Comment acknowledged. The recommended revisions will be made to the Information Sheet.

Comment A.6:

Page two of the Monitoring and Reporting Program (MRP) contains a list of wells included in the groundwater monitoring network for the site. The second and third private wells listed at the bottom show the addresses as being located on Road 36. The addresses are located on Road 136. Please change these addresses accordingly.

Response A.6:

Comment acknowledged. The recommended revisions to the well location addresses will be made.