

From: [Jason Muir](#)
To: [Moody, John@Waterboards](mailto:Moody.John@Waterboards)
Cc: [Bob Elder](#); [Tom Holdrege](#); [Bryan Botsford](#)
Subject: McCourtney Road Landfill - Comments on the Tentative Order
Date: Tuesday, December 10, 2013 9:55:05 AM

John,

This message is a follow-up to H&K's comments on the tentative order for McCourtney Road Landfill. Our comments were submitted in a letter dated December 3, and are modified as described below based on our discussion with you on December 4 and our subsequent correspondence with the County of Nevada.

Pursuant to my telephone conversation with you on December 4, I understand that the Regional Board is not inclined to eliminate the designation of SI-1 as a "backup" for the leachate tank farm, nor is the Regional Board inclined to modify the point of compliance designated in the tentative order. Therefore, H&K withdraws the comments pertaining to these topics. We understand that progress can be made regarding H&K's other comments on the tentative order, as summarized below and as presented in our letter dated December 3.

ITEMS THAT CANNOT BE MODIFIED

Surface Impoundment 1 (WDR Findings 65, 75, 76 and 92)

H&K understands that, at this time, the Regional Board will keep the "backup" designation for SI-1 in the revised WDR. H&K thus withdraws the comments on WDR findings 65, 75, 76 and 92.

Point of Compliance (MRP Section C.6)

H&K withdraws the comment on MRP Section C.6 regarding the presence of existing wells on the point of compliance.

Storm Water Monitoring Points (MRP Table A.3.b.i)

H&K understands that storm water monitoring point SW-104 is to serve as a background monitoring point. Therefore, we will adjust its location slightly so that the location better represents background.

ITEMS THAT CAN BE MODIFIED

H&K understands that you will pursue modifications to the tentative order regarding the following topics:

Concentration Limits (WDR Finding 55)

H&K requests that this finding be modified pursuant to our December 3 comment to more accurately reflect the County's good compliance record.

Pump Stations (WDR Finding 79) and Surface Impoundment Wells (MRP Table A.1.a.iii)

H&K requests that these findings be modified pursuant to our December 3 comments to more accurately reflect the site status.

Storm Water Monitoring Schedule (MRP Table A.3.b.ii)

H&K requests that this item be modified pursuant to our December 3 comment because the proposed additional VOC and metals testing for storm water is not considered useful. Storm water is monitored for constituents that would reasonably be present.

Liquids Discharge Monitoring Points (MRP Table A.6)

Based on our discussion on December 4, H&K understands that the flow monitoring requirement for the 90-91 Cell Subdrain Sump will be modified to periodic verification that the sump remains dry. H&K understands that estimation is acceptable for the low flows from septage and chemical toilet waste, because flow metering is infeasible and flows do not fluctuate much over the year.

Soil-Pore Gas Monitoring (MRP Section 8.a)

H&K requests that this section be modified pursuant to our December 3 comment to remove the proposed additional VOC testing criteria interior and perimeter gas probes, which would be very expensive and would not provide useful information.

NEXT STEPS

Please contact me if additional discussion is necessary. We appreciate your attention to these details and all your efforts in developing an accurate and efficient monitoring program for

McCourtney Road Landfill.

Regards,

Jason Muir, P.E., G.E.

Principal

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