

Regional Water Quality Control Board  
Central Valley Region

Response to Written Comments for  
Tentative Waste Discharge Requirements  
for  
County of Kern  
Lost Hills Sanitary Landfill, Kern 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 Kern, Lost Hills Sanitary Landfill, Kern County for postclosure maintenance. Tentative WDRs R5-2016-XXXX were prepared to update postclosure maintenance requirements for the landfill and incorporated Monitoring and Reporting Program R5-2016-XXXX (MRP). Currently, WDRs Order R5-2006-0046 regulate the Facility.

The Tentative WDRs were circulated on 12 February 2016 for public comment, ending on 16 March 2016. A total of one letter/email was received from the County of Kern and these comments are addressed below.

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

- A. Michael R. Burston, County of Kern, Public Works Department, 15 March 2016

## **RESPONSE TO COMMENTS**

### **Comment 1 (finding 2 WDRs):**

Kern County Public Works Department (KCPWD) requested the finding to be revised to read as follows:

The total property boundary encompasses 547.15 acres which contains one unlined waste management unit (WMU) covering 6.7 acres, as shown in Attachment B, which is incorporated herein and made part of this Order by reference. The facility is comprised of Assessor's Parcel Numbers (APN) 058-180-28, 058-180-43, 058-180-46, and 57-240-46, and 057-240-47.

#### **Response 1:**

The recommended revisions have been made to the WDRs.

### **Comment 2 (finding 19 WDRs):**

KCPWD requested the finding to read as follow:

The 100-year, 24-hour precipitation event for the facility was previously estimated to be 2.5 inches by the Kern County Hydrology Manual, dated 1992, using rainfall data published by the National Oceanic and Atmospheric Administration (NOAA) in 1973. Kern County now uses the 2011 NOAA Atlas, Volume 6, version 2, updated rainfall data for the Southwestern United States to determine design storm intensity. Based on the new dataset, the 100-year, 24-hour precipitation event for the facility is now 3.01 inches.

#### **Response 2:**

The recommended revisions have been made to the WDRs.

**Comment 3 (finding 34 WDRs):**

The presence of two non-naturally occurring waste constituents above their respective method detection limit (MDL), or one non-naturally occurring waste constituent detected above its practical quantitation limit (PQL) [a.k.a., laboratory reporting limit (RL)], indicates that a release of waste from a Unit has occurred.

KCPWD requests this finding be revised to read as follows:

The presence of two non-naturally occurring waste constituents above their respective method detection limit (MDL), or one non-naturally occurring waste constituent detected above its practical quantitation limit (PQL) [a.k.a., laboratory reporting limit (RL)], indicates that a release of waste from a Unit **may have occurred**.

**Response 3:**

Finding No. 34 in the WDRs has not been changed. In the absence of other information like trip blanks showing the presence of the constituents too, the evidence shows a release has occurred.

**Comment 4 (finding 51 WDRs):**

To allow flexibility in the way the iso-settlement maps are completed, KCPWD requests this finding be revised to read as follows:

Once every five years during the post-closure maintenance period of the closed landfill area, iso-settlement maps will be made to identify and evaluate landfill settlement. Iso-settlement maps will be prepared to determine the amount of differential settlement occurring over the previous five years. Pursuant to Title 27, Section 21090(e)(2), this Order requires iso-settlement maps to be prepared and submitted every five years. The maps may be completed using aerial photography or another appropriate method.

**Response 4:**

The recommended revisions have been made to the WDRs.

**Comment 5 (provision G.1 WDRs):**

The facility is closed and typically there are no personnel on site, KCPWD requests this provision be modified as follows:

The Discharger shall maintain a copy of this Order at the offices of the Kern County Public Works Department, including the MRP R5-2016-XXXX and the SPRRs dated January 2012, and make it available at all times to facility maintenance personnel, who shall be familiar with its contents, and to regulatory agency personnel.

**Response 5:**

The recommended revisions have been made to the WDRs.

**Comment 6 (Reporting B-MRP):**

KCPWD requested to revise the Semi-Annual Reporting due dates to 31 May and 30 November and Annual Reporting to 30 April.

**Response 6:**

The MRP has been revised to remove semi-annual reporting. An annual report of all data collected during the calendar year is due on 30 April of the following year.

**Comment 7 (Required Reports, Semiannual Monitoring Report, page 6 of the MRP):**

KCPWD requested to revise the Semi-Annual Reporting due dates to 31 May and 30 November.

**Response 7:**

Semi-Annual reporting has been removed.

**Comment 8 (Required Reports, Semiannual Monitoring Report, item g, page 7 of the MRP):**

The closed landfill is unlined with no leachate monitoring and control facilities. KCPWD requests this section be changed to read:

An evaluation of the effectiveness of the run-off/run-on control facilities

**Response 8:**

The recommended revisions have been made to the MRP.

**Comment 9 (Annual Monitoring Report, page 7 of the MRP):**

KCPWD requested to revise the due date for Annual Monitoring Report to 30 April.

**Response 9:**

The recommended revisions have been made to the MRP.

**Comment 10 (item g, page 8 of the MRP):**

KCPWD requested to update concentration limits for each monitoring parameter at each monitoring well based on the new data set once every five years.

**Response 10:**

The recommended revisions have been made to the MRP.

**Comment 11 & 12 (WQPS, page 9 & 10 of the MRP):**

KCPWD requested to update WQPS once every five years.

**Response 11 & 12:**

The recommended revisions have been made to the MRP.

**Comment 13 (Concentration Limits, item 4 page 11 of the MRP):**

KCPWD commented that the groundwater system at the site is not in a steady state and the concentrations of naturally occurring analytes may increase or decrease due to influences other than the landfill. If background concentrations increase, the WQPS should also increase.

**Response 13:**

The recommended revisions have been made to the MRP.