

Central Valley Regional Water Quality Control Board
23/24 June 2016 Board Meeting

Response to Written Comments on
Tentative Waste Discharge Requirements for
Anderson Landfill, Inc., Anderson Landfill
Class III Municipal Solid Waste Landfill and Class II Surface Impoundments
Shasta County

At a public hearing scheduled for 23/24 June 2016, the Regional Water Quality Control Board, Central Valley Region (Central Valley Water Board) will consider adoption of tentative Waste Discharge Requirements (WDR R5-2016-XXXX) for the Anderson Landfill, Inc., Anderson Landfill Class III Municipal Solid Waste Landfill and Class II Surface Impoundments in Shasta County. This document contains responses to written comments received from interested parties in response to the tentative Order. Written comments from interested parties were required to be received by the Central Valley Water Board no later than 5:00 p.m. on 14 May 2016 in order to receive full consideration. Timely comments were received from the following:

1. Geosyntec, on behalf of Anderson Landfill, Inc. (Discharger) submitted comments on 13 May 2016.

Written comments from the above interested party are summarized below, followed by the response of Central Valley Water Board staff.

DISCHARGER (ANDERSON LANDFILL, INC.) COMMENTS

DISCHARGER COMMENTS CATEGORY #1 – Factual Corrections

The Discharger provided factual corrections to the tentative WDRs.

Unit Acreage. The Discharger provided corrections to the developed acreage of the property and the area of specific landfill. The Discharger suggested language clarifying that the unit areas include overlaps so that the sum of all unit areas is greater than the total landfill footprint.

Closure Status of Units 2B and 2Ba. The Discharger indicated that Units 2B and 2Ba should be in partial closure (rather than final closure as indicated in the tentative WDRs). Final closure of these units will occur when Unit 1 has been completely filled and the final cover is completed.

RESPONSE:

Central Valley Water Board staff agrees with the factual corrections suggested by the Discharger. As such, the tentative WDRs and Information Sheet have been revised to make the corrections.

DISCHARGER COMMENTS CATEGORY #2 – Clarifications Regarding Landfill Components

The Discharger suggested the following clarifications regarding landfill components.

Planned/Future Features. The Discharger clarified that a composite liner is a planned/future feature for remaining areas of Unit 4C.

Liner/LCRS Components. The Discharger suggested the following clarifications to the descriptions of LCRS components.

- The Discharger clarified the particular components of the floor and side slope liner design. The liner design as described in the tentative WDRs was not specific to the floor and side-slope liners, which have slightly different components.
- The Discharger requested that the term “Base/Bottom Liner” be changed to “Floor Liner” for purposes of clarification. Bottom or Base liner could imply that more than one liner exists, when in fact the term is being used to describe the liner system on the floor of the unit.

Select Operations Layer. The Discharger clarified the following regarding the select operations layer for new landfill units.

- The Discharger clarified that the select operations layer would provide sufficient thickness for protection of the underlying side slope liner system as well as adequate drainage for twice the peak daily anticipated leachate generation.
- The Discharger clarified that the select operations layer on the slope would be 18 inches thick with a minimum hydraulic conductivity of 0.3 centimeters per second (cm/sec). The tentative WDRs described this layer as 12 inches thick with a minimum hydraulic conductivity of 0.02 cm/sec.

LCRS sumps. The Discharger provided several clarifications regarding the LCRS sumps, including:

- how the temporary LCRS sumps were moved during development of Unit 4;
- that the Unit 2Ba sump connects to the Unit 4 LCRS sump;
- plans for installation of pan lysimeters beneath future LCRS sumps;
- how planned Unit 5 sumps will be installed; and

- how the LCRS systems in Units 4A and 4B were connected to Unit 4C. The language in the tentative WDRs implied that the Unit 4A and 4B systems were piped to Unit 4C when in fact they are connected hydraulically via the blanket drainage layer.

RESPONSE:

Central Valley Water Board staff agrees with the clarifications suggested by the Discharger. As such, the tentative WDRs and Information Sheet have been revised to make these clarifications.

DISCHARGER COMMENTS CATEGORY #3 – Other Clarifications

The Discharger suggested the following additional clarifications:

Boundary Adjustment. The Discharger clarified that the proposed 200-ft shift of the Unit 5 eastern boundary has not been finalized, and suggested that this proposed action be considered a future adjustment of the boundary. The tentative WDRs indicated that the boundary adjustment was finalized.

Perched Water. In Finding Number 36, the Discharger clarified that any perched groundwater encountered during construction would only be collected via interceptor trenches. The finding as written in the tentative WDRs implied that interceptor trenches would be constructed no matter what.

RESPONSE:

Central Valley Water Board staff agrees with the clarifications suggested by the Discharger. As such, the tentative WDRs and Information Sheet have been revised with language to clarify the above concerns.

DISCHARGER COMMENTS CATEGORY #4 – Facility Layout

The Discharger provided an updated figure showing the facility layout. The tentative WDRs included the facility layout from the 2005 permit.

RESPONSE:

Central Valley Water Board staff agrees that the Discharger's updated figure showing the facility layout should be included as Attachment B to the WDRs and has made this revision.