

Response to Written Comments

In Consideration of Waste Discharge Requirements and Monitoring and Reporting Program Orders No. R1-2015-0019 for Trinity County Closure of Weaverville Class III Solid Waste Disposal Site and Operation of the Weaverville Inert Cell

Comments were received from Lawrence & Associates on behalf of the Discharger of the Landfill, Trinity County. Our response to these comments follows below.

Portions of these comment letters are included for reference. Staff responses to comments are shown in bold type. Comment letters are available for viewing http://www.waterboards.ca.gov/northcoast/board_decisions/tentative_orders/.

Lawrence and Associates letter of April 20, 2015

Waste Discharge Requirements

Comment 1: WDR Page 9, Groundwater, Item 46, Second Sentence. The text states: “*MW-4 was replaced by MW-4B in 1975 after MW-4 was damaged by heavy equipment.*”

MW-4 was replaced in 1995.

RTC 1: This typographical error has been corrected.

Comment 2: WDR Page 14, A. Discharge Prohibitions, Item 5. The text states: “*The discharge of wastes, including leachate, solids, or waste-derived gas to surface waters, surface water drainage systems, or groundwater is prohibited.*”

To be consistent with the proposed *Amendment to the Water Quality Control Plan for the Ocean Waters of California to Control Trash and Part 1 Trash Provisions of the Water Quality Control Plan for Inland Surface Waters, Enclosed Bays, and Estuaries of California*, the Discharger would like to add trash and rubbish to the list of wastes that cannot be discharged to surface water or groundwater. We suggest that this sentence be revised to state, “*The discharge of wastes, including leachate, solids, waste-derived gas, trash, rubbish, refuse, bark, sawdust, or other solid wastes to surface waters, surface water drainage systems, or groundwater is prohibited.*”

RTC 2: The change was made, but the second reference to solid waste was removed since it is redundant.

Comment 3: WDR Page 15, B. General Specifications, Item 1. The text states: *“The discharge of wastes shall not cause water quality degradation by allowing a statistically or non-statistically significant increase over background or baseline concentrations, as determined in accordance with Monitoring and Reporting Program No. R1-2015-0019.”*

It is unclear what is meant by “non-statistically significant increase.” The criteria for determining increases over background is whether a downgradient concentration is statistically higher than background. Natural variations in constituent concentrations can lead to downgradient concentrations that are sometimes higher than background. This condition should not be construed as an exceedance due to the Landfill. We recommend deleting phrase “non-statistically significant.”

RTC 3: We have reworded General Specification 1 and added Specification 2 to clarify the use of various methods to detect a release from the landfill as follows:

- 1. The discharge of wastes shall not cause water quality degradation by allowing a measurably significant increase over background or baseline concentrations, as determined by either statistical or non-statistical methods in accordance with Monitoring and Reporting Program No. R1-2015-0019.**

- 2. In order to provide the best assurance of the earliest possible detection of a release of non-naturally occurring waste constituents from a landfill unit, the WDRs specify a non-statistical method for the evaluation of monitoring data for non-naturally occurring compounds. The specified non-statistical method for evaluation of monitoring data provides two criteria (or triggers) for making the determination that there has been a release of non-naturally occurring waste constituents from a landfill unit. 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) [also known as the laboratory reporting limit (RL)], indicates that a release of waste from a Unit has occurred. Following an indication of a release, verification testing must be conducted to determine whether there has been a release from the landfill unit or the detection was a false detection. Using the detection of two non-naturally occurring waste constituents above the MDL as a trigger is appropriate due to the higher risk of false-positive analytical results and the corresponding increase in sampling and analytical expenses that would occur from using one non-naturally occurring waste constituent above its MDL as a trigger.**

Comment 4: WDR Page 16, B. General Specifications, Item 10; Page 19, second and third sentences. D. Inert Cell Operation, Item 7; Page 20, second and third sentences. Page 20; E. Provisions, Item 10, second and third sentences: The text states, “A likely rain *even* is any weather pattern that is forecast to have a 50% or greater probability of producing precipitation at the Site area. The Discharger shall print and keep for record a copy of precipitation forecast information from the *Nation* Weather Service Forecast Office (e.g.,.....”

We recommend correcting and revising these sentences to state, “A likely rain **event** is any weather pattern that is forecast to have a 50% or greater probability of producing precipitation at the Site area. The Discharger shall print and keep for record a copy of precipitation forecast information from the **National** Weather Service Forecast Office (e.g.,....”

RTC 4: These two typographical errors have been corrected.

Comment 5: WDR Page 20, E. Provisions, Item 8, and MRP Page 5. A. Required Reports, Item 2, third paragraph: The text states, “*In accordance with California Code of Regulations, title 27, section 20340(d), any leachate collection and removal system shall be tested annually to demonstrate proper operation. Results shall be compared with earlier tests made under comparable conditions. The results shall be submitted with next regularly scheduled monitoring report.*”

Weaverville Landfill’s leachate collection system is sealed and is installed in unlined portions of the Landfill. Based on L&A’s experience, testing of leachate systems is typically only required in lined landfills where all leachate is contained by the base-liner system. An example of leachate-system testing would entail discharging a set volume of clean water into a leachate control system riser and measuring the volume and flow rate of water discharging from the leachate collection system. Direct testing of this kind cannot be performed without significant modifications to the existing leachate collection system. Currently, the monthly leachate flow data is compared to the historic data to ensure that the system is not clogged. Based on the available leachate-flow records, the leachate flow rates have been relatively consistent since the leachate system was installed in 1997, which shows that the leachate collection system is operating correctly and is not clogged.

We request that language is added to E. Provisions, Item 8 and MRP page 5 that states, “Documentation and comparison of monthly leachate flow volumes is an acceptable means to ensure that the leachate collection system is not clogged.”

RTC 5: Provision 8 was updated to meet the intent of the reviewer’s comment, but staff added to the suggested language to make the reason for the non-standard method clearer. The updated Provision 8 is as follows:

- 8. In accordance with California Code of Regulations, title 27, section 20340(d), any leachate collection and removal system shall be tested annually to**

demonstrate proper operation. Results shall be compared with earlier tests made under comparable conditions. The results shall be submitted with the next regularly scheduled monitoring report. Given that the current leachate collection system is sealed and cannot directly receive the introduction of test liquids, documentation and comparison of monthly leachate flow volumes is an acceptable means to ensure that the leachate collection system is operating.

Comment 6: WDR Page 21, E. Provisions, Items 14, 45, and MRP, Page 6, A. Required Reports, Item 5: The text states, *“By January 2016, January 2021, and at least five years thereafter, the Discharger shall produce and submit to the Regional Water Board an iso-settlement map accurately depicting the estimated total change in elevation of the final cover’s low-hydraulic conductivity layer. For each portion of the landfill, this map shall show the total lowering of the surface elevation of the final cover, relative to the baseline topographic map to be submitted in the Closure Report.....”*

Phase 2 final closure of the Landfill is not likely to be completed until the fall of 2016 or 2017 (after the 2016 iso-settlement survey is due). Performing an iso-settlement survey before Phase 2 final closure is completed would only measure the settlement of the Phase 1 closure area. To measure settlement of the Phase 2 closure area in 2021, the 2016 iso-settlement survey would need to be merged with the Phase 2 final closure survey data. Merging two sets of survey data is problematic because combining surveys from different dates is likely to create errors in the final map that may not correctly depict the estimated total change in the closure cap’s elevation. We understand that Regional Board Staff would like the discharger to perform an iso-settlement survey before Phase 2 final closure construction so that areas that have settled on the Phase 1 closure cap area can be fixed during Phase 2 closure construction. Visual observation of the Phase 1 closure area, however, does not indicate areas of significant settlement that could be detected by a survey performed at a one-foot contour interval.

We request that the submittal date of the iso-settlement survey be revised so that it is required after the completion of the Phase 2 closure cap, and every five years thereafter.

RTC 6: The Phase I Closure Area has been closed for more than five years, and the cap does show signs of settlement. The iso-settlement map for 2016 will only be for the Phase I Closure Area (the only part that is currently capped), and is meant to direct any grading work for the Phase I Closure Area that can be accomplished during the Phase II closure construction. Iso-settlement maps made after complete landfill closure will be for the entire Class III landfill footprint. The text has been updated in these various sections to clarify what will be included in the 2016 iso-settlement map. These changes are as follows:

- 14. By January 2016 the Discharger shall produce and submit to the Regional Water Board an iso-settlement map accurately depicting the estimated total change in elevation of the final cover’s low-hydraulic-conductivity layer for**

the Phase I Closure Area. By January 2022, and at least every five years thereafter, the Discharger shall produce and submit to the Regional Water Board an iso-settlement map accurately depicting the estimated total change in elevation of the final cover's low-hydraulic-conductivity layer for the entire Class III SWDS footprint (both the Phase I and Phase II closure areas). For each portion of the landfill that is closed at the time of iso-settlement mapping, this iso-settlement map shall show the total lowering of the surface elevation of the final cover, relative to the baseline topographic map submitted in the original Closure Report for that phase of closure, and shall indicate all areas where visually noticeable differential settlement may have been obscured by grading operations. The map shall be drawn to the same scale and contour interval as the topographic map in the Closure Report for that phase of closure, but showing the current topography of the final cover, and featuring overprinted isopleths indicating the total settlement to date. Land surveying rather than aerial surveying may be substituted to produce the iso-settlement map [Cal. Code Regs., tit. 27, § 21090(e) (2)]. This map shall be made by, or under the direction of, a professional civil engineer or certified engineering geologist and shall be stamped and signed.

45. Pursuant to Section 13267(b) of the California Water Code, the Discharger shall complete the tasks outlined in these WDRs and the attached Monitoring and Reporting Program No. R1-2015-0019, in accordance with the following time schedule:

Action	Compliance Date
The Discharger shall submit a work plan for the installation of new groundwater well(s)	November 1, 2015
The Discharger shall submit a completion report for the monitoring system changes.	November 1, 2016
The Discharger shall prepare an iso-settlement map of the Phase I Closure Area per Provision No. 14.	January 15, 2016
The Discharger shall prepare an iso-settlement map of the Phase I and II Closure Areas per Provision No. 14.	January 15, 2022 and every five years thereafter
The Discharger shall submit a revised Sample Collection and Analysis Plan	January 31, 2017
The Discharger shall submit the Certification of Closure (Cal. Code Regs, tit. 27, § 21880) for the Class III SWDS within 180 days of the completion of construction activities, but no later than the compliance date shown.	March 31, 2018

In the Monitoring and Reporting Program, under A. Required Report

5. Five Year Iso-Settlement Map

The Discharger shall produce an iso-settlement map by January 2016 of the Phase I Closure Area; then of the entire Class III SWDS footprint, starting in January 2022, and every five years thereafter, until the Executive Officer has determined that differential settlement is unlikely to be of such magnitude as to impair either the Unit's containment features (e.g., final cover) or the free drainage of surface flow. The map shall be submitted to the Regional Water Board with the Annual Report for that year.

The iso-settlement maps shall accurately depict the estimated total change in elevation of the final cover's low-hydraulic-conductivity layer for any portion of the Class III SWDS footprint closed by the time of mapping. The iso-settlement map shall show the total lowering of the surface elevation of the final cover, relative to the baseline topographic map submitted in the original Closure Report for that phase of closure, and shall indicate all areas where visually noticeable differential settlement may have been obscured by grading operations. The map shall be drawn to the same scale and contour interval as the topographic map in the Closure Report for that phase of closure, but showing the current topography of the final cover, and featuring overprinted isopleths indicating the total settlement to date. Land surveying rather than aerial surveying may be substituted to produce the iso-settlement map [Cal. Code Regs., tit. 27, § 21090(e) (2)]. This map shall be made by, or under the direction of, a professional civil engineer or registered geologist and shall be stamped and signed.

Monitoring and Reporting Program

Comment 7: MRP Page 3, I. Reporting, Item 6, Laboratory Results. The text states: *"Analytical laboratory results shall be sent directly from the laboratory to our staff via email to gmorrison@waterboards.ca.gov, the same day they are submitted to the Discharger."*

Lab data is typically only sent to the Regional Water Quality Control Board staff after they have been reviewed for quality assurance and approved by a licensed professional. Also, this requirement creates a liability for the Discharger if the laboratory fails to send the analytical reports, per the requirement of the Monitoring and Reporting Program.

We request that this requirement be removed from the Monitoring and Reporting Program.

RTC 7: Since there can be a significant delay between lab results being obtained and the monitoring report being submitted, staff does still want to see the laboratory data when it is submitted to allow timely action to be taken on any issues being shown by the laboratory data. To address your concerns (from both your letter and May 18, 2015 email), we have changed the submittal date to ten business days after the laboratory submits the results to the discharger and these results may be marked preliminary. We also have removed the requirement for the results to come directly from the laboratory. Item 6 was changed as follows:

6. Laboratory Results:

Summarize and report laboratory results and statements demonstrating compliance with Part II. Include results of analyses performed at the Site that are outside of the requirements of this Monitoring and Reporting Program. Analytical laboratory results shall be sent to Regional Water Board staff via email to Gina.Morrison@waterboards.ca.gov, within ten business days of when they are submitted to the Discharger. Since the results have not undergone quality assurance and approval by the licensed professional preparing the monitoring reports, these results may be marked preliminary at the licensed professional's discretion.

Comment 8: MRP Page 3, I. Reporting Item 9, Standard Observations. The text states: "Each monitoring report shall include a summary and certification of completion of all Standard Observations for the waste management unit (WMU), for the perimeter of the WMU, and for the receiving water. The standard observations shall be performed on a weekly basis and include: condition of the WMU cover; whether storm water drainage ditches and sedimentation ponds contain liquids; condition of drainage facilities; condition of sedimentation ponds; whether there are any leachate seeps present, including estimates of seep size and flow; presence of odors; evidence of ponding....."

Except for the Inert Cell, Weaverville Landfill has not accepted waste in over 15 years. The Phase 1 closure cap and the remaining uncapped area has shown minimal erosion, minor settlement, and no leachate breakouts have occurred since Phase 1 closure was completed.

We recommend that the requirement for weekly Standard Observations be revised to a monthly basis in the winter (October through May), quarterly during the summer (June through September), and after rainfall greater than 2.5 inches in 24 hours.

RTC 8: The recommended change was made with the exception of the rainfall event, which was changed to 1.0 inches in 24 hours. The Discharger shall update the Post-Closure Maintenance Plan to reflect the change in site inspections. Further modifications to monitoring requirements may be proposed after the newly closed area has experienced at least two full rainy seasons and observations and monitoring data demonstrate that the landfill's vegetative layer is stable.

Comment 9: MRP Page 5, A. Required Reports, Item 2, second paragraph. The text states: *“The Annual Report shall contain proof of adequate assurances of financial responsibility for closure, post-closure maintenance, and corrective action for all known or reasonably foreseeable releases from a WMU at the facility in accordance with California Code of Regulations, title 27, sections 20380(b), 20950(f), 22210, 22211, 22212, 22220, 22221, and 22222 and include annual accounting for inflation. By January 15, 2018, 2023, and every five years thereafter, for the term of this MRP, the Discharger shall provide as part of the Annual Monitoring Report an updated post-closure costs and corrective action cost estimate to the Regional Water Board for review.....”*

The Landfill’s five-year permit review was last performed in 2014, and required an update to the Closure and Postclosure Cost Estimate. We assume that the next five-year permit review will be required to be submitted to the Local Enforcement Agency (LEA, Trinity County Environmental Health) by the fall of 2019. Furthermore, page 22, Item 19 of the WDR states that an updated Closure/Postclosure Cost Estimate and corrective action cost estimate shall be submitted by January 15, 2020, and every five years thereafter.

We request that submittal of an updated post-closure cost estimate and corrective action cost estimate be submitted to the Regional Water Quality Control Board after the five-year permit review is due, as stated on page 22 of the WDR. We request the due date stated in the Monitoring and Reporting Program for submittal of the post-closure cost estimate and corrective action cost estimate be revised to January 15, 2020, and every five years thereafter.

RTC 9: The requested change to the due dates for the updated cost-estimates has been made.

Comment 10: MRP Page 5, A. Required Reports, Item 3, Surface Water and Storm Water Sampling Report, second paragraph. The text states: *“Any detection of a man-made compound in the SWDS drainage or surface water is a surface water violation. To determine if the SWDS has contributed to discharge for naturally occurring compounds, data shall be compared to results from the background sampling locations SW-1 and SW-3. Any discharge of a naturally occurring compound at a level statistically greater than background is a violation. The calculation of background shall include consideration of variations that occur due to rainfall.”*

Storm/surface water monitoring point SW-2 (southeast of the Landfill) monitors surface and stormwater from the east side of the Landfill, as well as runoff from the Airport runway and hangars, Juvenile Hall, Highway 3, and Tom Bell Road. Storm/surface monitoring point SW-4 (south of the Landfill) monitors stormwater from the west side of the Landfill, as well as runoff from 5 Cent Gulch Street. Site activities at the Weaverville Airport and the surrounding roads may cause an exceedance of water-quality parameters at these monitoring points that may not be related to the Landfill or Transfer Station. The calculation of background values for SW-2 and SW-4 should take into account the surrounding site activities. Since there are other site activities that could potentially

contribute man-made compounds to the drainages that are not related to Landfill activities, we request that the following sentence be removed; “any detection of a man-made compound in the SWDS drainage or surface water is a discharge violation.”

RTC 10: The change requested will not be made, but the wording was changed to read “any detection of a man-made compound in the SWDS drainage or surface water is a potential discharge violation.” The Discharger has submitted that SW-2 and SW-4 are the downgradient sampling points and SW-1 and SW-3 are the upgradient sampling points for the landfill. As such, exceedances above the levels detected at SW-1 and SW-3 at the downgradient sampling points are considered potential violations. As in any potential release, this would trigger an investigation which would allow the Discharger to demonstrate the origin of the exceedance and take corrective action. The Discharger may propose changes to the sampling points and/or the site drainage to make the sampling more appropriate; updates to the MRP will be made at that time.

Comment 11: MRP Page 7, A. Required Reports, Item 7. The text states: “*The Joint Technical Document included the most current emergency response plan for the facility, dated April, 2010. The emergency response plan shall be updated by October 1, 2017 and at a minimum of every five years thereafter; or after key personnel changes or if during its implementation problems were found.*”

We request that submittal of an updated emergency response plan be submitted to the Regional Water Quality Control Board when the Closure/Post-Closure Cost Estimate and Corrective Action Cost Estimate is submitted. We request that the due date for submittal of an updated emergency response plan be changed to January 15, 2020, and every five years thereafter.

RTC 11: No changes were made to the initial due date of October 1, 2017. A new due date of January 15, 2020 was added to coincide with the due date of the Closure/Post-Closure Cost Estimate and Corrective Action Cost Estimate. Thereafter, the emergency response plan shall be updated at a minimum of every five years. The 2017 date allows the Discharger time to submit a timely update of the current document. The first update may be made any time up to the due date.

Comment 12: MRP Page 10, E. Groundwater Elevation Monitoring, and Page 15, E. Groundwater. The text states: “*The groundwater surface elevation (in feet and hundredths, M.S.L.) in all wells shall be measured on a quarterly basis for each monitored groundwater body and used to determine the velocity and direction of groundwater flow.....*”

Water levels are currently monitored semiannually, with water-level data for MW-1, MW-2, and MW-3 dating back to 1984. Seasonal water levels and the direction of groundwater gradients in the upper and lower aquifers are minimal and have been well documented. Quarterly monitoring would pose an additional cost burden for no significant benefit. Having said this, we do recommend quarterly water level monitoring of all monitoring

wells for two years after the new downgradient groundwater well is installed and after the gas-monitoring probes are utilized for groundwater monitoring. We anticipate that groundwater water levels in the new wells and gas probes will be consistent with the historic data, therefore, groundwater elevation monitoring should return to semiannually basis after two years.

RTC 12: California Code of Regulations, title 27, section 20415(e)(15) requires water elevations be measured at least quarterly. The Discharger will need to demonstrate that quarterly water elevation measurements are not necessary for determining flow rate and direction in each aquifer during times of expected highest and lowest elevations of the water levels in the wells. The Discharger's request can be evaluated when the demonstration has been submitted. No changes were made at this time.

Comment 13: MRP Page 13, C. Leachate Sampling, Item 1. a. Leachate. The text states: *"Leachate - Samples will be taken from the leachate sump located upline of the storage tanks semi-annually..."*

Leachate discharges into the leachate collection system during the wet season and immediately after rainfall, but does not discharge during the dry season or two days after rainfall. Therefore, obtaining samples during the fall groundwater monitoring event is not likely to be possible. Furthermore, leachate generation rates are likely to decrease once the Phase 2 closure cap has been constructed. We recommend changing the leachate sampling frequency to an annual basis during the winter when discharge is most likely to occur.

RTC 13: Based on the additional data submitted via email on May 7, 2015, routine leachate sampling frequency has been reduced to once per rainy season, between September and June, at each location. A sample at the leachate sump shall be collected as soon as adequate precipitation occurs for leachate to discharge from the landfill's leachate collection system. LFG-1 and LFG-2 must be checked for leachate every other month starting in September and ending in June, until a sample has been obtained for the season or the end of the rainy season (September through June). The changes to this section are as follows:

C. LEACHATE SAMPLING

1. Monitoring Locations

- a. Leachate – Samples will be taken from the leachate sump located upline of the storage tanks once per rainy season (September through June). The sump shall be sampled as soon as adequate precipitation occurs for leachate to discharge from the landfill's leachate collection system. The sump shall be checked for flow after each storm event (over 1-inch of precipitation in a week) until a sample is obtained. LFG-1 and LFG-2 shall be checked for the**

presence of leachate every other month starting in September and ending in June until a sample has been obtained for the season or the end of the rainy season; and if leachate is present a leachate sample shall be obtained. Any samples taken for the District for disposal shall also be reported.

- b. Seeps - If new seeps are detected the discharger shall immediately sample the seepage and test for field parameters and monitoring parameters listed in Table IIIB. and continue to sample seepage and report test results at frequencies listed in Table IIIB., thereafter. If the seep has been determined to contain leachate, steps shall be taken to abate the discharge.**

Comment 14: MRP Page 13, C. Monitoring Schedule, Table III.B and Page 17, Table III.E.

Please specify if total or dissolved metals analyses are required.

For the entire period record (1984 to 2014), most Title 26 metal constituents have been detected 10 to 50% of the time in both upgradient and downgradient wells, or these constituents are detected at low levels near and/or below the laboratory reporting limits. With the exception of barium and zinc, the concentrations of detected Title 26 metals downgradient of the Landfill are similar to the concentrations upgradient of the Landfill; the average barium and zinc concentrations in MW-3 are typically 50 to 100 micrograms per liter ($\mu\text{g/L}$) above the background concentrations. Historic barium and zinc concentrations in downgradient well MW-3 have not exceeded the primary or secondary maximum contaminant levels, and the concentrations of barium and zinc in MW-3 have been stable since 1984. Therefore, we request that Title 26 metals be sampled every five years during monitoring of the Constituents of Concern.

RTC 14: A note has been added to state that metals analyses are for dissolved concentrations rather than for total concentrations for groundwater and leachate. The frequency for sampling and testing for Title 26 metals has been reduced to once every five years for groundwater sampling locations, and annually for leachate. The Discharger may request a further reduction in sampling/analytical requirements for Title 26 metals in leachate once there is three years of data demonstrating that some or all Title 26 metals are not among the constituents normally found in this the landfill's leachate.

Comment 15: MRP Page 14-15, D. Surface Water and Storm Water, Table III.C.

As described in the Draft WDR Order No. R1-2015-0019, Item 33, storm water is already monitored and regulated at the Site by Weaverville Landfill NPDES Permit No. 1 531003899 under the State of California General Industrial Storm Water Permit. The list of monitoring parameters in the proposed MRP Table III.C does not match the current or proposed storm-water monitoring program under the General Industrial Storm Water Permit Order Nos.

97-03-DWQ (current) and 2014-0057-DWQ (effective July 1, 2015). Most of the proposed parameters in MRP Table III.C do not appear to be justified for landfill closure and inert cell operation, based on the history of the Weaverville Landfill/Transfer Station since the Landfill closed in 1999. The main constituents of concern in surface water are sediment (total suspended solids, TSS) and potential discharges of lubricants from vehicles and equipment operating at the Site (oil & grease). Dissolved iron is associated with naturally occurring presence in local sediment. No significant leachate discharges have been reported since 1999. Leachate is controlled, collected, and discharged to the sanitary sewer.

It is recommended that MRP Table III.C be revised as follows:

Parameter	Units	Frequency
<i>Field Parameters</i>		
pH	pH units	Twice per Season
Rainfall	inches	Daily
<i>Monitoring Parameters</i>		
Total Suspended Solids (TSS)	mg/l	Twice per Season
Oil & Grease	mg/l	Twice per Season
Dissolved Iron	µg/l	Twice per Season

RTC 15: Surface water sampling and testing in compliance with California Code of Regulations, title 27, section 20415(c)(2)(B) is meant to provide the best assurance of the earliest possible detection of a release from the unit. Without sampling for potential leachate parameters, this would not be possible. Although some monitoring results may be used to comply with both the individual WDRs and the General Industrial Storm Water Permit, the Discharger is expected to conduct the more stringent monitoring requirements to comply with both the individual WDR and the General Industrial Storm Water Permit. One change was made to the MRP for storm water/surface water sampling: Constituent of concern sampling was changed to only be required after a verified measurably significant release.

Comment 16: MRP Page 15, E. Groundwater and Page 17, Table III.E. The text states “*The amount of siltation in all wells shall be measured on an annual basis.*”

Except for MW-4B and the gas-monitoring probes that will be used for groundwater monitoring, PVC hand pumps have been installed in all of the groundwater monitoring wells. Siltation checks cannot be performed on the wells with hand pumps, without removing and re-installing the pumps. Pulling the pumps annually to check for siltation would require a significant amount of time and risk damaging the pumps and well casing. We recommend only pulling the pump and checking sediment level if the water becomes turbid, if the pump is producing sediment, or if the pump fails. There should be no reason to pull a pump unless there is some symptom of a problem. Furthermore, none of the onsite wells have become silted in. We recommend that the requirement for annual siltation checks be removed.

RTC 16: This requirement has been changed to as needed and during pump maintenance.

Comment 17: MRP Page 16, 1. Monitoring Locations, Table III.D. The table states that MW-5 and MW-6 shall be monitored on a semi-annual basis.

Because downgradient groundwater monitoring wells MW-5 and MW-6 were installed using a backhoe and may have surface water influence, L&A proposed in the Closure JTD that MW-5 and MW-6 should be eliminated from the monitoring well regime and gas-monitoring wells GP-10 (shallow), GP-13 (shallow) and GP-14 should be used instead to monitor the shallow aquifer downgradient of the Landfill. L&A also recommended that monitoring well MW-3 be appropriately abandoned and a new well (MW-3A) be installed with a deeper seal. The purpose for installation of MW-3A and performing monitoring at gas-monitoring wells GP-10 (shallow), GP-13 (shallow) and GP-14 was to stop utilizing wells that are not constructed properly and have shown evidence of surface water influence.

We request that sampling at MW-5 and MW-6 be discontinued as soon as these WDRs become effective and that GP-10 (shallow), GP-13 (shallow) and GP-14 be sampled instead.

RTC 17: The Joint Technical Document did not contain a work plan for the changes proposed to the sampling wells. Consequently, the WDRs do not include the changes that you describe. The Discharger may submit a work plan for consideration by Regional Water Board staff. The work plan must show that the proposed gas wells are screened across the entire water bearing zone to assure that sampling will be able to detect both lighter than water and denser than water chemicals. If the work plan is deemed acceptable, Regional Water Board staff will revise the MRP to incorporate the approved changes.

Comment 18: MRP Page 17, 2. Monitoring Schedule, Table IIIE.

As discussed in Comment #9, groundwater elevations should be changed to semiannually, except for two years after the new downgradient groundwater well is installed and after the gas-monitoring probes are utilized for groundwater monitoring. Little additional site characterization will be gained from monitoring the monitoring well network quarterly for an extended period.

Siltation monitoring should be removed or changed to “as needed”.

RTC 18: Groundwater elevation requirements are unchanged per RTC 9. Siltation requirements have been changed to “as needed” and “during pump maintenance.”