



April 25, 2013

Mr. John Moody
Water Resources Control Engineer
Title 27 Permitting Unit
California Regional Water Quality Control Board, Central Valley Region
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670-6114

Re: Tentative Revised Waste Discharge Requirements (Tentative WDRs) for Florin Perkins Landfill,
issued March 20, 2013

Dear Mr. Moody:

Teichert Land Co. (TLC) has previously submitted comments to you on the above referenced item, dated April 22, 2013. We have appreciated your availability to discuss our concerns by phone April 23-25, 2013. Below are several supplemental comments based on our conversations with you, and review of comments concurrently submitted to California Regional Water Quality Control Board, Central Valley Region by Florin Perkins Landfill (FPL) on April 22, 2013.

1. Revise FINDING 17 as follows: "The site....The Discharger...and the likelihood that adjacent on-site quarry pit areas..." This is consistent with the April 22, 2013 email delivered to you by Patrick F. Dunn, consultant to FPL.
2. Revise CORRECTIVE ACTION SPECIFICATION C.1. as follows: "Methane and other landfill gases, if present ...to prevent danger of adverse health effects, nuisance conditions or the impairment of the beneficial uses of surface water, groundwater or adjacent properties due to downward or lateral migration through the unsaturated zone.
3. We note the request made by Mr. Loren Harlow (representing Ms. Nancy C. Cleavinger, Discharger) in comments submitted April 22, 2013, and presented to us by you on April 23, 2013, that the schedule for implementation of the landfill gas (LFG) control vents may need to be extended by about 12 months due to permitting requirements of the Sacramento Metropolitan Air Quality Management District (SMAQMD). We understand the need for a one year extension for the Task completion dates for the Southern Fill Area schedule from that proposed in PROVISION 8 of the Tentative WDRs. However, the proposed schedule extension is as much as 2.75 years.

TLC remains concerned about delayed implementation of LFG venting from the Eastern Fill Area. In TLC's April 22, 2013 comments (comment #4), requested earlier installation of passive gas vents for the Eastern Fill Area to mitigate against possible health risks on adjacent properties posed by the movement of LFG through the unsaturated zone. However, a revised, extended schedule was also proposed by Mr. Harlow for the Northern and Eastern Fill Areas. This revised schedule proposes extending the completion date by 13 months. Alternatively, TLC requests FPL install the initial set of interim LFG vents in the Eastern Fill Area by June 2014. This schedule would allow SMAQMD permitting and initial interim vent monitoring to be completed by July 1, 2016, and the complete

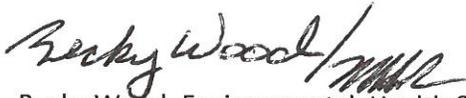
installation and submittal of the certification report for the Eastern Fill Area interim LFG vents and probes by the end of 2016.

In addition, TLC would expect that FPL would be required to review the passive vent program if the methane concentrations detected in the vapor probes increase above the 20 percent methane level, and modify the system to provide sufficient corrective action to keep the Eastern Fill Area or other areas from presenting adverse health and nuisance issues on the adjacent properties.

4. Finding 55.a indicates that FPL will install drainage control channels along the eastern side slope of the Eastern Fill Area which will require re-grading portions of the eastern side slopes which currently terminate at the property line. TLC requests these improvements be scheduled as soon as possible to prevent any drainage issues on adjacent properties and to allow concurrent installation of a replacement well for Aspen 1 MW-1.

We thank you in advance for your incorporation of the revisions to the Tentative WDRs requested above. Please contact me at BWood@teichert.com if you have any questions or desire further clarification.

Sincerely,

A handwritten signature in black ink that reads "Becky Wood" followed by a stylized flourish.

Becky Wood, Environmental, Health & Safety Manager
Teichert Materials