



SOLID WASTE DEPARTMENT

5955 SOUTH MOONEY BLVD
VISALIA, CA. 93277
PHONE (559) 624-7195
FAX (559) 740-4448

BRYCE HOWARD, DIRECTOR

December 31, 2013

Mr. Dan Carlson, Senior Engineering Geologist
California Regional Water Quality Control Board
Central Valley Region
1685 E Street
Fresno, CA 93706

**RE: COMMENTS ON TENTATIVE WASTE DISCHARGE REQUIREMENTS,
EARLIMART LANDFILL, TULARE COUNTY**

Dear Mr. Carlson,

This letter is in response to the Tentative Waste Discharge Requirements (WDRs) for the Earlimart Landfill received by this office dated 11 December 2013. In the accompanying Notice of Public Hearing, it is stated that any comments or recommendations concerning the Tentative WDRs should be submitted to your office in writing by 5:00 pm on 10 January 2014. Staff from the Tulare County Solid Waste Department have reviewed the Tentative WDRs and have the following comments:

Waste Discharge Requirements:

Finding No. 24 states in pertinent part, "...*The estimated groundwater gradient is approximately 0.077 feet per foot. ...*".

Comment: Groundwater contour maps presented in the 1st Semi-Annual 2013 report each show that the estimated groundwater gradients in the first and second quarters of 2013 were 0.0060 feet per foot. Please change the finding accordingly.

Finding No. 40 – The last sentence of the finding states, "*The CAP was implemented by the Discharge October 2012.*"

Comment: Please change the sentence to read, "*The CAP was implemented by the Discharge in October 2012.*"

Finding No. 41 – The finding states in pertinent part, "*The final cover consists of the following, in ascending order: a two-foot thick soil foundation layer, a geosynthetic clay liner (GCL), a geosynthetic drainage layer, and a two-foot thick vegetative soil layer.*"

Mr. Dan Carlson
Page 2

Comment: As the finding reads currently, it can be interpreted to imply that the geosynthetic drainage layer (GDL) is part of the final cover on the entire site. Construction of the approved final cover system at the Earlimart landfill incorporated GDL on slopes greater than 10% only; which are primarily the 3:1 perimeter side slopes. Please change the finding accordingly.

Site Map

The Site map shows there are seventeen (17) landfill gas monitoring wells at the site. The approved December 2006 Final Closure/Postclosure Maintenance Plans for the Earlimart landfill eliminated the following landfill gas monitoring wells at the site from the landfill gas monitoring program during the postclosure maintenance period: G-1, G-2, G-3, G-8, G-9, G-13, G-14, G-15, and G-16. Please update the Site map accordingly.

Information Sheet

Please update the Information Sheet accordingly to incorporate the above comments.

Monitoring and Reporting Program

A. Monitoring, 1. Groundwater Monitoring

Page two (2) contains a list of the wells included in the groundwater monitoring network for the site. The second and third Private Wells listed at the bottom show the addresses as being located on Road 36. The address of these two Private Wells are located on Road 136. Please change these addresses accordingly.

The County appreciates the opportunity to comment on the Tentative Waste Discharge Requirements for the Earlimart Landfill. If you have any questions or need clarification on any of our comments, please feel free to contact me at (559)624-7190.

Sincerely,



Bryce Howard, Director

cc: Joy Isaacson, CalRecycle
Ken Bowers, Tulare County HHSA – Environmental Health Division.