
Central Valley Regional Water Quality Control Board

16 December 2013

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Nevada County Department of Public Works
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RESPONSE TO COMMENTS, TENTATIVE REVISED WASTE DISCHARGE REQUIREMENTS, MCCOURTNEY ROAD LANDFILL, NEVADA COUNTY

Central Valley Water Board permitting staff reviewed your 3 December 2013 comments on the tentative Waste Discharge Requirements (WDRs) for the McCourtney Road Landfill, as amended by your 10 December 2013 email (copies enclosed). The tentative WDRs were issued on 31 October 2013 and are scheduled for consideration at the Water Board's 6 and 7 February 2014 meeting. This letter provides Water Board staff's response to your comments. A summary of each comment and staff's response is provided below.

1. Concentration Limits

The County requests that Finding 55 be modified as shown below to more accurately reflect the site history.

55. The Discharger submitted an updated statistical evaluation procedure in 2010 for groundwater detection monitoring, and since that time has updated the groundwater concentration limits on a semi-annual basis pursuant to this procedure does not currently have an approved list of concentration limits for detection monitoring. . . .

Staff Response – No change. Finding 55 accurately summarizes the approval status of concentration limits at the site based on the file record. Previous WDRs required that the Discharger use an interwell procedure for detection monitoring and no alternative statistical procedure has been approved to date. The tentative WDRs maintain the requirement that concentration limits be based on this approach, absent a satisfactory demonstration that an alternative approach is justified.

2. Class II Surface Impoundment Operations

Comments withdrawn per 10 December 2013 email.

Staff Response – No change.

3. Storm Water Monitoring

Monitoring parameters for storm water include the full list of Title 22 metals and Volatile Organic Compounds (VOCs). The County requests that storm water be monitored only for constituents that could be reasonably encountered in stormwater,

i.e., total lead and petroleum hydrocarbons (gasoline, diesel, motor oil and grease).

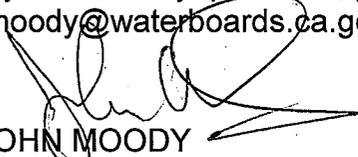
Staff Response – Given the fact that the landfill is closed and storm water at the site flows to sedimentation basins prior to discharge, staff concurs with a reduction in the monitoring frequency. The required monitoring frequency for VOCs and dissolved metals in the tentative WDRs has therefore been reduced from semiannually to every five years, but not eliminated. Monitoring for constituents such as total lead and petroleum hydrocarbons may be required under the General Storm Water Permit.

Other edits to the tentative WDRs in response to comments included minor modifications or clarifications (i.e., Finding 79 - pump station descriptions; MRP Table A.6 - sump monitoring methods; MRP Table A.8.a.ii - triggers for VOC sampling of soil-pore gas; and MRP Table A.1.a.iii - monitoring well information). The location map for the tentative WDRs (WDR Attachment A) has also been replaced with a version showing the area topography.

Staff hopes that the above responses adequately address your comments regarding the tentative WDRs for the McCourtney Road Landfill. Please note that the agenda package for the February 2014 Board meeting, including copies of the above-referenced comments and this letter, will also be posted on the Water Board's website at the following link:

http://www.waterboards.ca.gov/centralvalley/board_info/meetings/#2013

If you have any questions, please feel free to contact me at (916) 464-4641 or by email at jmoody@waterboards.ca.gov.



JOHN MOODY
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Title 27 Permitting and Mines

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