



Kings Waste & Recycling Authority

KWRA
A Joint Powers Authority



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RECEIVED

APR 14 2014

RWQCB-CVR
FRESNO, CALIF.

April 14, 2014

Mr. Daniel L. Carlson
Senior Engineering Geologist
California Regional Water Quality Control Board
Central Valley Region
1685 "E" Street
Fresno, CA 93706-2020

RE: KWRA RESPONSE TO 2014 TENTATIVE WDRs FOR THE HANFORD LANDFILL, KINGS COUNTY, CALIFORNIA

Dear Mr. Carlson:

This letter is in response to the Tentative Waste Discharge Requirements (WDRs) for the Hanford Landfill received by this office dated 21 March 2014. 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 p.m. on 18 April 2014 in order that consideration may be given them prior to the meeting of the Central Valley Water Board. KWRA staff has reviewed the Tentative WDRs and has the following comments:

WASTE DISCHARGE REQUIREMENTS:

GROUNDWATER DEGRADATION & CORRECTIVE ACTION

Finding No. 43 (WDRs page 8) states in pertinent part, "Proposed is that groundwater would be extracted from extraction wells EX-1 through EX-5 and pumped into four 10,000-gallon above ground tanks for aeration. The aeration system would consist of a float-based aerator, and possibly more, placed inside each of the above-ground tanks to volatilize VOCs to nondetect. Initiation of groundwater extraction was proposed for extraction well EX-2 where the most significant concentrations of total VOCs in groundwater have been detected."

Comment: It is suggested that the finding be changed to read in pertinent part "Proposed is that groundwater would be extracted from extraction well EX-2 only and pumped into four 10,000-gallon above ground tanks for aeration."

A1

CEQA AND OTHER CONSIDERATIONS

Finding No. 57 (WDRs page 11) states in pertinent part, *“Based on the threat and complexity of the discharge, the facility is determined to be classified 1A as defined below:*

- a. *Category 1 threat to water quality, defined as, “Those discharges of waste that could cause the long-term loss of a designated beneficial use of the receiving water. Examples of long-term loss of a beneficial use include the loss of drinking water supply, the closure of an area used for water contact recreation, or the posting of an area used for spawning or growth of aquatic resources, including shellfish and migratory fish.”*
- b. *Category A complexity, defined as, “Any discharge or toxic wastes; any small volume discharge containing toxic waste; any facility having numerous discharge points and groundwater monitoring; or any Class 1 waste management unit”.*

Comment: Based on the March 13, 2014 example *Models of Hydrogeologic Units* contained in the State Water Resources document titled *“Hydrogeologic Modeling”* it is our contention that the Hanford Landfill falls into the Hydrogeologic Simple Model and that based on the proposed CAP to be implemented at the site, the designation of the Hanford Landfill should be 1B rather than 1A. KWRA would appreciate consideration of this change particularly since the 1B designation would not only more accurately describe the site conditions, but would also provide some much needed fiscal relief for our operating budget.

G. CORRECTIVE ACTION SPECIFICATIONS

Item 1 (WDRs page 14) states: *“By 31 October 2014, the Discharger shall submit an amended report of waste discharge and a time schedule to establish a corrective action program.”*

Comment: KWRA respectfully requests an additional six months be added to the timeline and thereby suggests this item read: *“By 31 March 2015, the Discharger shall submit an amended report of waste discharge and a time schedule to establish a corrective action program.”*

Item 2 (WDRs page 14) states: *“The Discharger shall initiate groundwater extraction from extraction well EX-2 adjacent to the northwestern area of the Unit where the highest concentration of total VOCs have been detected to verify that the extraction/aeration system is removing VOCs from the extracted groundwater. Once it is determined that the extraction/aeration system is removing VOCs from the extracted groundwater, the Discharger shall expand groundwater extraction to extraction wells EX-1, EX-3, EX-4, and EX-5.”*

Comment: Previous estimates indicated that due to the considerably lower concentration of VOCs in the other site extraction wells (EX-1, EX-3, EX 4, and EX-5), continuous pumping of millions of gallons of groundwater would result in only the removal of less than 0.5-pounds of VOCs.

Rather than automatically adding the additional extraction wells, it is requested that this item read: *“The Discharger shall initiate groundwater extraction from extraction well EX-2 adjacent to the northwestern area of the Unit where the highest concentration of total VOCs have been*

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A3

A4



detected to verify that the extraction/aeration system is removing VOCs from the extracted groundwater. Once it is determined that the extraction/aeration system is removing VOCs from the extracted groundwater, the Discharger shall evaluate whether additional site groundwater extraction wells should be added to the extraction CAP."

A4

Item 6 (WDRs page 15) states in pertinent part: "By 31 October 2014 the Discharger shall submit a plan for sampling water..."

A5

Comment: KWRA respectfully requests an additional six months be added to the timeline and thereby suggests this item read: "By 31 March 2015, the Discharger shall submit a plan for sampling water..."

Item 8 (WDRs page 15) states in pertinent part: "By 31 October 2014 the Discharger shall submit a plan for modifying the LFG extraction system..."

A6

Comment: KWRA respectfully requests an additional six months be added to the timeline and thereby suggests this item read: "By 31 March 2015, the Discharger shall submit a plan for modifying the LFG extraction system..."

Item 10 (WDRs page 16) states in pertinent part: "By 30 November 2014, the Discharger shall implement a CAP pursuant to Section 20430 of Title 27..."

A7

Comment: KWRA respectfully requests an additional six months be added to the timeline and thereby suggests this item read: "By 30 April 2015, the Discharger shall implement a CAP pursuant to Section 20430 of Title 27..."

Item 13 (WDRs page 16) states in pertinent part: "... the Discharger shall submit an amended RWD..."

A8

Comment: Suggest the language to be revised in pertinent part to say "...the Discharger shall submit an Amended Report of Waste Discharge (ROWD)..." . (This correction needs to be made globally throughout all portions of the draft WDRs including the STANDARD PROVISIONS AND REPORTING REQUIREMENTS.)

H. PROVISIONS

Item 7 (WDRs page 18): Compliance Dates.

Comment: Per the previous comments listed above, KWRA respectfully requests the following changes to the compliance dates:

A9

Task C1, C2 and C3 from 31 October 2014 to 31 March 2015.

Task C5 from 30 November 2014 to 30 April 2015.

MONITORING AND REPORTING PROGRAM NO. R5-2014-XXXX

5. Corrective Action Monitoring

Paragraph 1 (MRP page 6) reads: *"The Discharger shall submit monthly status reports on the effectiveness of the proposed extraction/aeration system in remediating ground water for the first 90 days from start-up and thereafter on a quarterly basis (see Corrective Action Specification G.7. of the WDRs). Monthly status reports shall be submitted for the first three months after start-up and the quarterly status reports shall be submitted in the semiannual monitoring reports"*.

A10

Comment: We request that this item to be revised in pertinent part to say "The Discharger shall submit monthly status reports on the effectiveness of the proposed **aeration (strike extraction)** system in remediating ground water for the first 90 days from start-up and thereafter on a quarterly basis."

Paragraph 2 (MRP page 6) reads in pertinent part: *"The annual corrective action program status report needs to contain tables showing the concentrations of detected VOCs at groundwater monitoring wells MW-1, HL-13, HL-14, and the Keverline and Mendoza domestic wells for each monitoring event beginning with the VOC concentrations at the implementation of the groundwater extraction/aeration system, and time/plot graphs showing stability, decreases, or increases in VOC concentrations at groundwater monitoring wells MW-1, HL-13, HL-14, and the Keverline and Mendoza domestic wells."*

A11

Comment: Mendoza should read Martinez. (This correction needs to be made globally throughout all portions of the draft WDRs including Attachment B.)

Item f (MRP page 10) reads: *"A map showing the area and elevations in which filling has been completed during the previous calendar year and a comparison to final closure design contours, and include a projection of the year in which each discrete landfill module will be filled"*.

A12

Comment: This item should be removed entirely since the site is a closed landfill which no longer takes waste and consequently does not require filling.

Item h (MRP page 10) reads: *"The results of the annual testing of leachate collection and removal systems required under Standard Facility Specification E.14 of the SPRRs."*

A13

Comment: This item should be removed entirely since the site is does not have a leachate collection system.

INFORMATION SHEET

Page 1, last paragraph reads in pertinent part: *"The latest self-monitoring report (Second Semiannual Monitoring Report, 2012) detected: CFC-12; 1,1-DCA; 1,1-DCE; fcis-1,2-DCE..."*

A14

Comment: should read in pertinent part: "The latest self-monitoring report (Second Semiannual Monitoring Report, 2012) detected: CFC-12; 1,1-DCA; 1,1-DCE; CIS-1,2-DCE..."

A14

Page 2, paragraph 3 reads in pertinent part: "Proposed is that groundwater would be extracted from extraction wells EX-1 through EX-5 along the western point of compliance and pumped into four 10,000-gallon above-ground tanks for aeration".

Comment: A revised corrective action program (CAP) titled "Groundwater Remediation Plan Utilizing Aeration Revision 1-5 September 2012" was submitted on 28 September 2012. The Discharger's revised CAP proposes a five-year pilot test utilizing a groundwater extraction/aeration system to remediate VOCs in groundwater and control the hydraulically down-gradient migration of VOCs in groundwater.

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Paragraph should read in pertinent part: "Proposed is that groundwater would be extracted only from extraction well EX-2, which is located along the north-western point of compliance and pumped into four 10,000-gallon above-ground tanks for aeration. The aeration system would consist of a float-based aerator, and possibly more, placed inside each of the above-ground tanks to volatilize VOCs to non-detectable concentrations. Initiation of groundwater extraction was proposed for extraction well EX-2 where the most significant concentrations of total VOCs in groundwater have been detected. Following aeration, the treated groundwater would be discharged to one or more on-site evaporation/percolation basins. Additionally, the Discharger proposes increasing LFG extraction in the northwestern portion of the Unit where VOC concentrations in groundwater and LFG are the highest to control VOC migration to groundwater."

Thank you for the opportunity to review the Tentative WDRs for the Hanford Landfill. The changes we have requested above we believe are reasonable and consistent with site conditions. If you have any questions regarding the above change requests, please do not hesitate to contact me.

Sincerely,



Jeff Monaco
Executive Director

- Attachments:
Figure 1 Site Map
Table 1 Analytical Results
Analytical Results and COC Records

