



**KWRA**  
A Joint  
Powers Authority



**Member Agencies:**

City of Corcoran  
City of Hanford  
City of Lemoore  
County of Kings



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October 13, 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  
CORCORAN LANDFILL, KINGS COUNTY, CALIFORNIA**

Dear Mr. Carlson:

This letter is in response to the Tentative Waste Discharge Requirements (WDRs) issued for the Corcoran Landfill and dated 18 September 2014 that were prepared by the Regional Water Quality Control Board (RWQCB) and sent to the Kings Waste and Recycling Authority (KWRA). In the accompanying Notice of Public Hearing, it states that any comments or recommendations concerning the Tentative WDRs should be submitted to your office in writing by 5:00 p.m. on 20 October 2014 in order that consideration may be given them prior to the meeting of the Central Valley Water Board on 4 and 5 December 2014. KWRA staff has reviewed the Tentative WDRs and has the following comments:

**WASTE DISCHARGE REQUIREMENTS:  
SURFACE WATER AND GROUNDWATER CONDITIONS**

**Finding No. 20 (WDRs page 3) states in pertinent part, "However, the unlined Sweet Canal borders the facility on the north and along the west".**

**Comment:** KWRA respectfully requests that Finding No. 20 should be changed to read: However, the unlined Sweet Canal borders the facility on the north and along the east.

**WASTE DISCHARGE REQUIREMENTS:  
GROUNDWATER DEGRADATION & CORRECTIVE ACTION**

**Finding No. 38 (WDRs page 6) states in pertinent part, "On 9 April 2014, Central Valley Water Board staff ..."**

**Comment:** The actual date was 9 April 2004. Consequently Finding No. 38 should be changed accordingly to read: On 9 April 2004. This change needs to be made on the Information sheet as well.

**WASTE DISCHARGE REQUIREMENTS:  
PROCEDURAL REQUIREMENTS**

**F. MONITORING SPECIFICATIONS (WDRs Item 2, page 11) states in pertinent part,** *“The Discharger shall, for any landfill unit in a **corrective action** monitoring program, comply with the **corrective action** monitoring program provisions of Title 27, MRP R5-2014-XXXX, and the Standard Monitoring Specifications listed in Section I of SPRRs”.*

**Comment:** Stated, in part, on Page 6 of the Tentative WDRs, GROUNDWATER DEGRADATION AND CORRECTIVE ACTION (section), Finding 38 states that: *“On 9 April 2014, Central Valley Water Board staff approved a CAP that consisted of monitored natural attenuation (MNA), conditioned on the total cumulative VOC concentration remaining below an action level of 5 micrograms per liter ( $\mu$ /L)”*. Also, Finding 39 states: *“In a 24 July 2006 letter, Central Valley Water Board staff considered the inorganic EMP to be complete and, based upon the results, did not require the Discharger to submit an EFS or implement a CAP”*.

Based on the above KWRA respectfully requests that the wording of the subject item be changed to read: The Corcoran Landfill, which consists of only one WMU, is not currently under a corrective action program either for VOCs or for inorganic constituents. In the event that the total cumulative VOC concentration exceeds 5- $\mu$ /l over two semi-annual sampling events, then KWRA is required to comply with the corrective action monitoring program provisions of Title 27, MRP R5-201-XXXX and the Standard Monitoring Specifications listed in Section I of SPRRs.

**WASTE DISCHARGE REQUIREMENTS:  
ATTACHEMENTS A and B**

The Titles of Attachments A and B state in pertinent part: *“For Post-Closure Maintenance and **Corrective Action**”*.

**Comment:** KWRA respectfully requests that the wording of the subject items in Attachments A and B be changed to read: For Post-Closure Maintenance and **Detection Monitoring**

**MONITORING AND REPORTING PROGRAM NO. R5-2014-XXXX**

**Item A. Monitoring (page 1, bottom-of-page Table Item A.3 states: “**Seep Monitoring**”.**

**Comment:** KWRA respectfully requests that for clarity and historical consistency that the above item should be changed to read: A.3 **Leachate Seep Monitoring**.

**Item A. Monitoring (page 1, bottom-of-page Table Item A.5 states: “**Corrective Action Monitoring**”.**

**Comment:** KWRA respectfully requests that because the Corcoran Landfill is not in corrective action item “A.5 Corrective Action” should be eliminated entirely.

### **MONITORING AND REPORTING PROGRAM NO. R5-2014-XXXX**

**Item 1. Groundwater Monitoring (page 2, center-of-page Table Items MW-1, MW-2 and MW-3) states: “Detection/Corrective Action”.**

**Comment:** KWRA respectfully requests that “**Detection/Corrective Action**” should be changed to read: **Detection Monitoring**; and wells MW-4 and 90-1 should read **Background Monitoring**.

**Second Paragraph on Page 2** also contains the phrase “**corrective action wells**”.

**Comment:** KWRA respectfully requests that the above phrase be eliminated because as stated previously the site is not in corrective action.

**Item 3. Seep Monitoring (page 3 of M&RP No. R5-2014-XXXX).**

**Comment:** KWRA respectfully requests that the above title be changed to **Leachate Seep Monitoring**. KWRA also suggests conducting a global document check-and-change for these related words (seep monitoring to leachate seep monitoring).

**B. REPORTING (page 5 of M&RP No. R5-2014-XXXX) Reporting Schedule.**

**Comment:** KWRA respectfully requests that to be consistent with the latest WDRs for the Hanford Landfill **the scheduled reporting dates for items B.1 be changed to read due date 31 August, and 28 February**; instead of the current 1 August and 1 February.

In addition, Item B.3 currently reads “*Seep Reporting*”; KWRA respectfully request that this be changed to **Leachate Seep Reporting**.

**REQUIRED REPORTS (page 6 of M&RP No. R5-2014-XXXX) Item 1. Semiannual Monitoring Reports in part states:...”are due on 1 August and 1 February”.**

**Comment:** KWRA respectfully requests that the above scheduled reporting dates be changed to read: **are due 31 August, and 28 February**; instead of the current 1 August and 1 February.

**REQUIRED REPORTS (page 8 of M&RP No. R5-2014-XXXX) Item 2. Annual Monitoring Report in part states:...”The Discharger shall submit an Annual Monitoring Report to the Central Valley Water Board by 1 February....”.**

**Comment:** KWRA respectfully requests that the above scheduled reporting date be changed to read: **28 February**; instead of the current 1 February.

**REQUIRED REPORTS (page 9 of M&RP No. R5-2014-XXXX) Item 3. Seep Reporting. In part states... “any seepage”. Word seepage is also shown on sub-item a) “seepage”.**

**Comment:** KWRA respectfully requests that the word seepage be preceded by the word leachate in both of the above items so that it reads: **leachate seepage**.

Thank you for the opportunity to review the Tentative WDRs for the Corcoran 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,

A handwritten signature in blue ink that reads "J. Monaco". The signature is cursive and stylized.

Jeff Monaco  
Executive Director