



**COUNTY OF PLACER  
FACILITY SERVICES DEPARTMENT**

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May 25, 2007

California Regional Water Quality Control Board  
Central Valley Region  
Attn: John Moody  
11020 Sun Center Drive #200  
Rancho Cordova, CA 95670-6114

**Re: Meadow Vista Landfill – Tentative Waste Discharge Requirements (WDRs) –  
Comments**

Placer County staff has reviewed the Tentative Waste Discharge Requirements (WDRs) for the Meadow Vista Landfill and have the following comments:

Waste Discharge Requirements

1. Finding No. 11 – Correction: "Meadow Vista Community Water District" should read "Meadow Vista County Water District".
2. Finding No. 13 – Please revise first sentence to read: Surface drainage from the site is to two unnamed intermittent drainage courses, one west of the upper deck and another immediately southeast of the landfill toe. These unnamed drainage courses are tributaries of Lake Combie, which is a tributary to the Feather River and the Sacramento River.
3. Finding No. 23 – States that groundwater in the southeast drainage area "*...sometimes surfaces as a natural spring.*" Note that since the installation of the closure cap and leachate collection system, our inspection records indicate that there has been no spring activity in the southeast drainage area. The County requests that this reference be removed or be qualified to have occurred prior to closure.
4. Finding No. 27 – Point of Clarification: The County notes that Carbon Disulfide is listed in MW-2 at a concentration of 65 micrograms per liter (ug/l) and MW-11D 9 ug/l. These were the levels detected in samples taken in February of 2006; the retests did not confirm the presence of carbon disulfide in any of the monitoring wells retested.

11476 C Avenue Auburn CA 95603  
Entrance at 2855 2nd Street

5. Finding No. 40 – Correction: The last sentence states that leachate is “...hailed offsite for disposal in the City of Auburn’s sewage collection system.” Leachate is discharged to Placer County, Sewer Maintenance District 1 collection system.
6. Finding No. 41 – Correction: The third sentence states “...only the infill well gas is flared, while the perimeter gas is vented to atmosphere.” This incorrectly implies that the perimeter wells are continuously passively venting landfill gas. The County proposes this section be revised to read: “...only the infill well gas is flared. Perimeter wells are connected to a separate collection piping system with a separate blower to provide the option of extracting gas from the perimeter and venting to the atmosphere on an as needed basis. To this point there has not been a need to operate the perimeter system.”
7. Finding No. 42 – Correction: As written, the Finding does not accurately describe the site drainage controls. Please replace Finding No. 42 with the following:  

“Storm water controls installed as part of landfill closure included cover grading (see Finding 38), diversionary berms and ditches, perimeter ditches and pipelines, swales, culverts, drop inlets, velocity controls (e.g., rip rap lined channels and catch basins) and other measures. Also, an asphalt “V” ditch was constructed around the upper deck of the landfill to divert off-site storm water flows away from the landfill, to the southwest and southeast. The upper deck was graded to flow mostly to the south–southeast, into the southern perimeter drain; however, the northwest portion flows to the southwest and discharges at SW-5 into the western perimeter drain. The northeast portion of the upper deck and the lower deck (including the asphalt-covered portion) convey sheet flow to the southern perimeter drainage system, which consists of an 18-inch corrugated drain pipe that begins in the southwest corner of the lower deck and runs southeast to a drop inlet along the southern access road. Downstream of the drop inlet, the drain was installed under the southern access road sloping to a rip rap lined outfall at SW-1 in the southeast portion of the site. Additional drop inlets were installed along the road to capture sheet flow runoff from the road and adjacent portions of the landfill. The drainage system included berms and bench swales constructed along the landfill toe slopes. A soil berm was installed immediately above the toe to divert lower deck flows toward a drop inlet along the southern access road (rip rap was also installed as an erosion control measure in this area).”
8. Finding No. 48 – Please insert \$1,600,000.00 for the approximate cost of corrective action measures implemented at the site including landfill closure construction and installation of landfill gas controls. Please insert \$160,000.00 for additional corrective action for addressing a known or a reasonably foreseeable release, including evaluation monitoring.

9. PART E. MONITORING SPECIFICATION, Items 17 through 19 – These items appear to specify statistical analysis methods that are not consistent with a corrective action monitoring program. Typical statistics for a Corrective Action Program would not set concentration limits but rather evaluate trends to determine if water quality is stable, improving or continues to be impacted. The County requests that an item be added which states that corrective action wells be evaluated using trend analysis only and not be compared to statistical interwell concentration limits. In addition to this clarification, the County requests that Table E.3B of the Monitoring and Reporting Program be amended to delete the references to “Interwell” data analysis for all of the Monitoring Parameters.
10. PART E. MONITORING SPECIFICATION, Item 20 – We request that “unexplained” VOCs be added to the discussion of VOCs and triggers of release. A detection of a VOC which is also detected in an associated method blank, trip blank, or field blank is likely caused by laboratory or field cross contamination and should not be considered during the non-statistical review of VOC data.

#### Monitoring and Reporting Program

11. Monitoring and Reporting Program, PART D. LEACHATE MONITORING Item 1, Seeps – The second sentence states “*Any leachate seeps observed during these inspections or at any time shall be sampled and analyzed for the constituents of concern referenced in Table C herein.*” As previously stated, since the installation of the closure cap and leachate collection system, our inspection records indicate that there have been no seeps observed. During an inspection, if a leachate seep were observed, County staff would make efforts to contain the leachate, to prevent it from reaching any surface water drainage features. Typically, leachate seeps are low volume, would be difficult to sample, and the analysis would not provide any additional information regarding the constituents of the leachate beyond sampling at the leachate sumps. Therefore, the County requests that the above sentence be revised to read “If any leachate seeps observed during these inspections or at anytime, appear to have impacted surface water runoff, surface water shall be sampled from the drainage course impacted and analyzed for constituents of concern.”
12. Monitoring and Reporting Program, PART D. LEACHATE MONITORING, Item 2.d. – This item states “*COC monitoring shall be conducted every two years instead of every five years.*” The County does not feel it is necessary to increase the frequency of the COC monitoring from five years to two years. The site has been closed since March of 1997. Closure included installation of the leachate collection system. All leachate generated is removed, and disposed of offsite. The tentative WDRs include an expanded list of COC parameters for future sampling and historic sampling does not indicate a history of excessive levels of any COC parameter in

the leachate. Therefore, the County requests that frequency for COC testing remain five years.

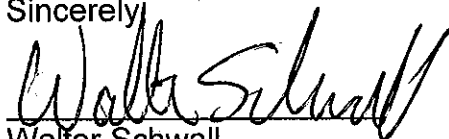
13. Monitoring and Reporting Program, PART G. SURFACE WATER MONITORING – The table refers to SW-5 as “Upstream of landfill toe” and SW-1 as “Downstream of landfill toe”. This incorrectly implies that surface water runs onto the landfill at SW-5 and runs off the landfill at SW-1. In fact, SW-1 and SW-5 are two discrete discharge points influenced by separate drainage areas of the landfill. Storm water discharges offsite from each point to different surface water drainage courses. Considering the only surface water runoff at the site is storm water generated from the actual area of the closed landfill, the County requests that surface water sampling requirements be deleted and that the County sample Storm Water per the NPDES General Permit.
14. Monitoring and Reporting Program, Tables F – We request that Table F be amended to reflect the attached VOC list, which is the complete list of VOCs that are run for the 8260B test method by the lab contracted by the County. Acetone, Acrylonitrile and Carbon disulfide would also be added as these constituents have been detected in previous monitoring.

Correction: The Standard Method for alkalinity is SM 2320B, not SM 2310.

Regarding Table F, we would like the option of running either test 6010 or 200.7 for major cations.

Thank you for the opportunity to review the Tentative WDRs for the Meadow Vista Landfill. Should you have any questions or would like to discuss our comments, please feel free to call me at 530-886-4942.

Sincerely,



Walter Schwall  
Senior Civil Engineer

Attachment: STL 8260B, VOC list

cc: Bill Zimmerman

Quote No.: 69110  
Revision: 1-00  
Dated: 2/17/2006  
Printed: 17:01:25 - 5/24/2007  
Client Number: 320  
Project Manager: Robert Weidenfeld  
Protocol: A Normal Turn Around  
SAC: XX I 25 QK 01  
List: 20503 -  
Units: ug/L

Analytical TAT: 17  
Networkable (Y/N): N  
Tics (Y/N): N  
Dry Weight (Y/N): N  
Qualifiers (Y/N): Y

Test Description: WATER, 8260B, Volatile Organics, GC/MS (

Synonym	Name	RL
00196	Benzene	1.0
00318	Bromobenzene	1.0
00321	Bromochloromethane	1.0
00323	Bromodichloromethane	1.0
00340	Bromoform	1.0
00343	Bromomethane	1.0
00393	n-Butylbenzene	1.0
00395	sec-Butylbenzene	1.0
00398	tert-Butylbenzene	1.0
00463	Carbon tetrachloride	1.0
00521	Chlorobenzene	1.0
00535	Dibromochloromethane	1.0
00550	Chloroethane	1.0
00569	Chloroform	1.0
00574	Chloromethane	1.0
00614	2-Chlorotoluene	1.0
00617	4-Chlorotoluene	1.0
03260	1,2-Dibromo-3-chloropropane (DBCP)	2.0
03261	1,2-Dibromoethane (EDB)	2.0
00888	Dibromomethane	1.0
00904	1,2-Dichlorobenzene	1.0
00907	1,3-Dichlorobenzene	1.0
00910	1,4-Dichlorobenzene	1.0
03615	Dichlorodifluoromethane (Freon 12)	1.0
00933	1,1-Dichloroethane	1.0
00936	1,2-Dichloroethane	1.0
00948	cis-1,2-Dichloroethene	1.0
00950	trans-1,2-Dichloroethene	1.0
00943	1,1-Dichloroethene	1.0
00986	1,2-Dichloropropane	1.0
00989	1,3-Dichloropropane	1.0
00990	2,2-Dichloropropane	1.0
00998	cis-1,3-Dichloropropene	1.0
01000	trans-1,3-Dichloropropene	1.0
00996	1,1-Dichloropropene	1.0
01332	Ethylbenzene	1.0
01489	Hexachlorobutadiene	1.0
01578	Isopropylbenzene	1.0
01590	p-Isopropyltoluene	1.0
01811	Methylene chloride	1.0
01932	Naphthalene	1.0
02247	n-Propylbenzene	1.0
02355	Styrene	1.0
02437	1,1,1,2-Tetrachloroethane	1.0
02439	1,1,2,2-Tetrachloroethane	1.0

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Qualifiers (Y/N): Y

<u>Synonym</u>	<u>Name</u>	<u>RL</u>
02445	Tetrachloroethene	1.0
02489	Toluene	1.0
02514	1,2,3-Trichlorobenzene	1.0
02515	1,2,4-Trichlorobenzene	1.0
02518	1,1,1-Trichloroethane	1.0
02522	1,1,2-Trichloroethane	1.0
02525	Trichloroethene	1.0
03614	Trichlorofluoromethane (Freon 11)	1.0
02563	1,2,3-Trichloropropane	1.0
02587	1,2,4-Trimethylbenzene	1.0
02592	1,3,5-Trimethylbenzene	1.0
02613	Vinyl chloride	1.0
02940	m-Xylene & p-Xylene	1.0
02623	o-Xylene	1.0