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June 20, 2008



Mr. John Moody
Regional Water Quality Control Board
Central Valley Region
11020 Sun Center Drive #200
Rancho Cordova, CA 95670

1017-08-134473

Subject: Comments on Tentative Revised Waste Discharge Requirements for
Clean Closure of Folsom Corporation Yard Landfill

Dear Mr. Moody:

This letter presents comments on the *Tentative Revised Waste Discharge Requirements for Clean Closure of Folsom Corporation Yard Landfill* prepared by the Regional Water Quality Control Board on May 23, 2008. The objective of the project is to obtain clean closure certification from regulatory agencies and prepare the site for unrestricted reuse. The following comments apply to the Order.

- Page 1, Finding 4: Please note that the property boundary of the Corporation Yard extends beyond the fence line as indicated in the Contract Drawings, sheet C1. The Limit of Work (e.g., excavation and grading activities) for the project extends past the fence line in the southwest portion of the property, but remains within the property boundary. The fence will be replaced after work is complete.
- Page 4, Finding 22: We are not aware of a recorded seismic event of 7.0 on the Richter scale for the Bear Mountain Fault Zone. Please provide the reference.
- Page 5, Finding 26: The Conceptual Site Model suggests infiltration into the perched zone is from surface infiltration during rain events, rather than from infiltration from the Laguna Formation (although this may have a minor contribution).
- Page 8, Finding 38: The Conceptual Site Model suggests that deep groundwater monitoring well FCY-3 is not hydraulically connected to FCY-8 or FCY-9 which are in the perched zone. The discussion of spatial distribution of inorganic constituents in the perched zone should omit the reference to FCY-3.

- Page 29, Provision 8a: Requiring the delivery of certain project items two months prior to construction will delay the project considerably. For example, the construction contractor typically prepares a detailed construction schedule and sequencing plan two weeks prior to construction for review by the owner. Requiring this information two months prior to construction would delay the project by six weeks. Note, however, that the majority of requested items have already been delivered as outlined below.
 - The *Final Amended Report of Waste Discharge/Clean Closure Work Plan* was prepared on May 8, 2008 and included an excavation plan (Section 3.5), quality assurance plan (Section 3.7), and a project schedule (Appendix G).
 - The design plans and specifications were prepared on June 9, 2008 and include the site grading plans.

- Page 29, Provision 8b: We request that the due date for the Post-Closure Maintenance Plan (PCMP) be extended to January 31, 2009 since several other deliverables (as-built plans, Clean Closure Results Report, etc.) are due within two months after completion of construction.

The following comments apply to the Monitoring and Reporting Program.

- Page 2, Section C1 and Page 11, Table G.1: Based on 12 years of monitoring groundwater at the site, the following constituents of concern are not reasonably expected to be detected in groundwater and should be removed from the program: semi-volatile organic compounds (SVOCs), organophosphorous and organochlorine pesticides, chlorinated herbicides, and polychlorinated biphenyls (PCBs). In addition, monitoring for metals and volatile organic compounds (VOCs) should be limited to those analytes that have been detected previously.

- Page 4, Section C5: A compliance period that extends three years following removal of the landfill unit is excessive given that clean closure will remove the landfill waste.

- Page 5, Section D3: Corrective action monitoring proposed for the lower zone is inconsistent with Findings 38 and 40 in the Order. Intra-well monitoring is proposed for groundwater monitoring wells FCY-3 and FCY-7, but these wells are upgradient of the landfill and are not likely connected with the shallow perched zone immediately below the landfill.

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Please call me at (916) 853-5385 if you have any questions regarding the project.

Sincerely,

BROWN AND CALDWELL

A handwritten signature in cursive script that reads "Guy J. Graening".

Guy J. Graening, P.E.
Project Manager

GJG:mp

cc: Mr. Walt Sadler, City of Folsom