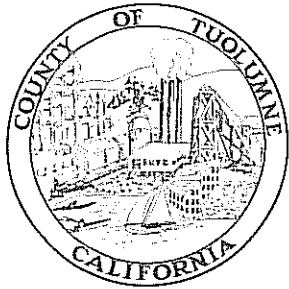


WLB



County of Tuolumne Department of Public Works

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May 29, 2008

Mr. Bill Brattain, Water Resources Control Engineer
California Regional Water Quality Control Board,
Central Valley Region
11020 Sun Center Drive, #200
Rancho Cordova, CA. 95670

Re: Tentative Revised Waste Discharge Requirements,
Jamestown Landfill, Tuolumne County

08 JUN -3 PM 3:25
RECEIVED
SACRAMENTO
CVR/WQCB

Dear Mr. Brattain:

On an overall basis, we find the Tentative Revised Waste Discharge Requirements and Monitoring and Reporting Program for the Jamestown Landfill very comprehensive, well compiled and acceptable. We just have a few comments and requests for your consideration in finalizing the Jamestown Landfill Revised Waste Discharge Requirements and Monitoring and Reporting Program (WDR) adoption at the July 31, August 1, 2008 Regional Board Meeting.

We respectfully request to adjust the due date for the WDR Provision G.15 submittal to January 30, 2009 instead of the Tentative WDR listed November 18, 2008. The reason for the requested change is that closure construction will run from June into December 2008. During construction we will undertake appropriate observations, investigations, and possible improvements of the western leachate collection system and the timing for completion of a response may not be possible until after construction is completed.

The Monitoring and Reporting Program requires your consideration for the following changes:

1. Table I – Constituent of Concern (Table VI) footnote 1 is provided on Total Organic Carbon, Inorganics (dissolved), Semi-Volatile Organic Compounds (USEPA Method 8270), Chlorophenoxy Herbicides (USEPA Method 8150), and Organophosphorus Compounds (USEPA Method 8141) states “Semiannually for monitoring wells TM-1R and TM-6”. In the April 2008 Report of Waste Discharge – Amended Request, Monitoring & Reporting Program No. R5-2002-0173, Jamestown Landfill, we requested in Proposal Item 4 to retain semi-annual COC monitoring of only USEPA Method 8270. Review of monitoring information has never found detection of constituents analyzed by Chlorophenoxy Herbicides (USEPA Method 8150) and Organophosphorus Compounds (USEPA Method 8141) in Wells TM-1R and TM-6.

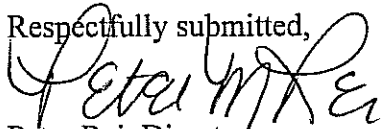
As a result, we did not suggest including those analytical methods being continued on a semi-annual basis. Please consider removing the footnote on all Constituent of Concern except for Semi-Volatile Organic Compounds (USEPA Method 8270).

2. Table VI – The County’s contract laboratory, BC Laboratories has suggested changes in the USEPA Method for several inorganics as listed below:

	Tentative Monitoring And Reporting Program <u>USEPA Methods</u>	Recommended Changes to Monitoring and Reporting Program <u>USEPA Methods</u>
Antimony	7062	6020 (ICP.MS)
Barium	6010	6020 (ICP.MS)
Beryllium	6010	6020 (ICP.MS)
Cadmium	7131A	6020 (ICP.MS)
Chromium	6010	6020 (ICP.MS)
Cobalt	6010	6020 (ICP.MS)
Copper	6010	6020 (ICP.MS)
Silver	6010	6020 (ICP.MS)
Tin	6010	6020 (ICP.MS)
Vanadium	6010	6020 (ICP.MS)
Zinc	6010	6020 (ICP.MS)
Arsenic	7062	6020 (ICP.MS)
Lead	7421	6020 (ICP.MS)
Nickel	7521	6020 (ICP.MS)
Selenium	7742	6020 (ICP.MS)
Thallium	7841	6020 (ICP.MS)

If you have any questions, please advise or discuss with Jim Wyse at 925-997-6941 or jwyse4@aol.com.

Respectfully submitted,



Peter Rei, Director
Public Works Department

CC: Craig Pedro, CAO
James Wyse, Pacific Waste Services, Inc.
Rick Mitchell, Geomatrix Consultants, Inc.
Bob Hoagland, Condor Earth Technologies