



COUNTY OF COLUSA

DEPARTMENT OF PUBLIC WORKS

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John Moody
Regional Water Quality Control Board
11020 Sun Center Drive #200
Rancho Cordova, CA 95970-6114

NOTICE OF TENTATIVE REVISED WASTE DISCHARGE REQUIREMENTS FOR STONYFORD LANDFILL, WDID # 5S06I005372

Dear Mr. Moody,

In light of the Board's decision to proceed with a Tentative Revision to the Waste Discharge Requirements for the Stonyford Landfill, WDID # 5S6I005372, despite our letter of protest 5 December 2013, we offer the following comments:

1. Page 4 of WDR item 39 states "No VOCs have been detected in any of the groundwater monitoring wells at the site since 2007 when the Discharger installed passive landfill gas vents as a corrective action measure."

Page 7 of the WDR states "No VOC sampling of the landfill gas emitted from the probes has ever been conducted, so it is not currently known what VOCs the gas may contain and at what concentrations. To evaluate the nature of landfill gas as a potential source of impacts at the site, and to monitor the effectiveness of corrective action measures, MRP No. R5-201X-XXXX requires that the Discharger monitor the vents for field gases and VOCs as part of ongoing corrective action monitoring."

Comment: As the groundwater data clearly shows that the no VOCs have been detected since the installation of the passive soil gas vents there does not appear to be just cause or rationale for the increase monitoring and sampling of vents for field gases and VOCs. Monitoring for the effectiveness of the corrective action (soil gas vents) should continue to be limited to groundwater sampling and analyses. Therefore we request that all items relating to soil gas vents monitoring be deleted from the WDRs and MRP.

2. Page 8 of WDR item 37 states "...require that the Discharger submit a work plan for installation of two new background monitoring wells to monitor the upper and lower zones of the uppermost aquifer beneath the site..."

Comment: As the uppermost aquifer is typically limited in thickness and as the well screen interval is typically 20 feet, it does not seem reasonable that two wells can be installed where there will be substantial distance (separation) between the upper and lower zones of the uppermost aquifer that would result in obtaining any real meaningful spatial data. As such it is requested that only one (1) new well be installed. References to two wells and associated sampling in the MRP also need to be deleted.

3. Page 12 of the WDR item 49 states "...it is estimated that the landfill will reach capacity in the year 2036. It should be noted, however, that the above calculations assumed a 3.3-acre landfill footprint, whereas the 2009 topographic survey indicated a footprint of about 4.0 acres. Closure and Postclosure Specification E.1 requires that the Discharger address this issue as part of a revised Preliminary Closure and Postclosure Maintenance Plan required under these WDRs."

Page 16 of the WDR item 62 states "Various other assumptions in the report may also need to be re-

visited (e.g., waste density, footprint, seismicity, model design). The demonstration would also need to address the absence of benching, given that one of the proposed cover slopes would exceed the 50 foot maximum rise specified in Title 27, section 21090(a) without benching”.

Page 16 item 65 states “...requires that the Discharger submit a revised PCPCMP, including, but not limited to, updated landfill footprint and capacity calculations; a revised closure design, as necessary; updated slope stability analysis; and revised financial assurance cost estimates to reflect the findings and postclosure maintenance and monitoring requirements under this Order”.

Page 16 item 66 states “The total estimated cost of landfill closure specified in the PCPCMP is \$740,429 in 2013 dollars. This estimate includes, but is not limited to, costs of site preparation; facilities decommissioning; acquisition and placement of cover soil and geosynthetic layers; construction CQA testing; installation of drainage controls; completion of landfill gas controls; establishment of vegetative cover; reporting documentation (including FCP and certification report preparation), and other items, including 20% contingency,”

Comment: Whereas Colusa County has spent considerable funds and just completed an updated Preliminary Closure and Post-Closure Maintenance Plan in 2012, and Whereas the PCPCMP provides reasonable design analyses for future closure and maintenance of the landfill in 2036 (22 years in the future) and Whereas the PCPCMP contains a 20% contingency for cost estimating and whereas Colusa County maintains financial assurance well above the 21% minimum required by CalRecycle, Colusa County takes exception to WDR requirement for a new revised PCPCMP. This document is costly to prepare and at this time provides little if any updates to the usefulness and overall management of the landfill and protection of groundwater. Please delete this requirement.

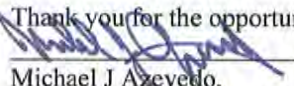
4. Page 7 of MRP item 4b shows a new storm water sampling point as S-3 in the sedimentation basin. Attachment B, Facility Map also shows this sampling point and the associated sedimentation basin.

Comment: The proposed new sampling point S-3 is incorrectly shown on attachment B. There is not a basin beyond the landfill perimeter fence. A schematic layout of the correct basin location and sampling points S-1 and S-2 are shown in the attached aerial overview. As the basin contains surface water runoff which in many times accumulates and does not flow out the outfall culvert, collecting an additional sample S-3 will not provide meaningful data. This data will likely be biased as concentrations of TDS, Chlorides etc. will be higher due to evaporation and point source accumulation. Conversely, concentrations such as VOCs will be biased low due to surface evaporation and volatilization. As such sample point S-3 adds no meaningful data and will unnecessarily increase the costs of the monitoring program. Please delete this sampling point from the MRP.

5. Page 11 of MRP, states “... and all required monitoring data acquired from offsite well owners...”

Comment: It is unclear from a review of the WDRs and MRP what data would be acquired from offsite well owners. Please clarify.

Thank you for the opportunity to comment, do not hesitate to contact me if you have any questions.


Michael J Azevedo,
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cc:

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