

From: Craig Morgan
To: [Hartzell, Marty@Waterboards](mailto:Hartzell.Marty@Waterboards); [Busby, Robert@Waterboards](mailto:Busby.Robert@Waterboards)
Cc: [Tim Beals](#)
Subject: Comments on Tentative Waste Discharge Requirements - Loyalton Landfill
Date: Friday, April 21, 2017 2:32:05 PM

Via Email Transmittal

Marty Hartzell, PG, CHG
Senior Engineering Geologist
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670-6114

Re: Comments on Tentative Waste Discharge Requirements - Loyalton Landfill

As a follow-up to my email of May 14, 2017 and our conference call on May 19th with Tim Beals and Robert Busby, I wanted to summarize Sierra County's comments on the tentative waste discharge requirements for the Loyalton Landfill.

- Consistent with our discussions on May 19th, it is the County's understanding that the detection of landfill gases beyond the waste unit within landfill gas probes installed at the perimeter of the landfill would not in and of themselves be considered to be releases pursuant to the terms of the WDRs.
- The Unsaturated Zone Monitoring wells are referred to as either detection, corrective action and/or Point of Compliance (POC) wells in the tentative monitoring and reporting program. It is suggested that they all simply be referred to as "monitoring wells" or "detection wells".
- The monitoring and reporting program requests that groundwater elevations be monitored quarterly as opposed to semi-annually. We request that the elevations continue to be monitored on a semi-annual basis as the elevations generally only vary about 2 feet over the course of a year.

We appreciate the Board staff's assistance in moving the permitting process forward in support of the County's proposed closure of the landfill.

Best regards,

AVALEX INC.

Craig W. Morgan

Principal Engineer

Cc: Tim Beals

Craig W. Morgan, MBA, P.E.

Avalex Inc.
P.O. Box 550218
South Lake Tahoe, California 96155

591 Tahoe Keys Blvd., Suite D6
South Lake Tahoe, California 96150

(530) 543-3200
Fax (530) 543-3201
craigmorgan@avalex.info

CONFIDENTIALITY NOTICE: This communication and any accompanying document(s) are confidential and privileged. They are intended for the sole use of the addressee. If you receive this transmission in error, you are advised that any disclosure, copying, distribution, or the taking of any action in reliance upon the communication is strictly prohibited. Moreover, any such inadvertent disclosure shall not compromise or waive the attorney-client privilege as to this communication or otherwise. If you have received this communication in error, please contact the sender at the above listed number.