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September 01, 2021

"Transmitted Electronically"

Mrs. Kristen Gomes, P.E.
Water Resource Control Engineer
California Regional Water Quality Control Board
Central Valley Region
1685 "E" Street
Fresno, CA 93706

RE: Tentative Waste Discharge Requirements (WDRs)
Kern County Public Works Department Comments
Arvin Sanitary Landfill
Kern County, California
WDID No. 5D150303001

Dear Mrs. Gomes:

Attached to this Cover Letter is the Summary of Comments from the Kern County Public Works Department on the Tentative Waste Discharge Requirements (WDRs) for the Arvin Sanitary Landfill. Also attached along with this Cover Letter is the Arvin WDR PDF Comments Supporting Document, which contains the same comments that can be found in the Summary of Comments.

Both the Summary of Comments and the Arvin WDR PDF Comments Supporting Document will be uploaded to GeoTracker on September 01, 2021.

If you have any questions, please do not hesitate to contact me at (661) 862-8895.

Sincerely,



Jeff Davis, P.E.
Engineering Manager

Arvin Sanitary Landfill – Tentative Waste Discharge Requirements (WDRs)

September 01, 2021

Kern County Public Works Department (Department) Summary of Comments

Comment #1 (Monitoring & Reporting Program; Page 2 & 3; Corrective Action and Detection Monitoring Program (DMP); Table 1)

Groundwater monitoring wells AR1-05, AR1-24, and AR1-28 are going dry. Kern County Public Works Department (KCPWD) is planning to decommission these wells and install replacement monitoring wells. KCPWD has requested a proposal from our consultant to do the Work Plan to decommission the wells and install the replacement wells. KCPWD will submit the Work Plan to the Water Board when it has been prepared by the consultant.

Comment #2 (Monitoring & Reporting Program; Page 3; Corrective Action and Detection Monitoring Program (DMP); Table 1)

Corrective Action Program (CAP) wells AR2-01 and AR2-02 have dewatered. AR2-03 and AR2-07 are projected to be dry within 2 years. AR2-07 is the only one of these wells with detections.

Comment #3 (Monitoring & Reporting Program; Page 4; Corrective Action and Detection Monitoring Program (DMP); Table 3)

Nitrate is not listed as a constituent parameter in Table 3. We recommend Nitrate be added to Table 3.

Comment #4 (Waste Discharge Requirements Order; Page 2; Introduction; Finding No. 8)

The abandoned, non-hazardous oil field waste processing facility was located on a five-acre parcel within the southwest corner of the Facility.

Comment #5 (Waste Discharge Requirements Order; Page 3; Waste Classification & Permitting; Finding No. 12)

For closed landfills, the document is not titled a JTD (only active sites have this designation). Final Postclosure Maintenance Plan is the term that should be used. The term is used later in the document (bullet 36). We recommend updating this section.

Comment #6 (Waste Discharge Requirements Order; Page 3; Site Conditions; Finding No. 17)

First encountered groundwater ranges between 78 to 85 feet beneath the WMU to 96 feet in the CAP wells beyond the facility perimeter.

Comment #7 (Waste Discharge Requirements Order; Page 3; Site Conditions; Finding No. 18)

The elevation of first encountered groundwater does not typically fluctuate but the

groundwater is declining at a rate of 1 to 2 feet per year. The deeper aquifer does show some seasonality.

Comment #8 (Waste Discharge Requirements Order; Page 16; Attachment A – Site Location Map)

The property boundary is incorrect. Please see the attached Arvin Sanitary Landfill property boundary maps.

Comment #9 (Waste Discharge Requirements Order; Page 17; Attachment B – Site Map)

Property boundary is incorrect. Please see the attached Arvin Sanitary Landfill property boundary maps. Also, the VenVirotek note should perhaps say “Former VenVirotek Area”.

Comment #10 (Waste Discharge Requirements Order; Page 19; Standard Provisions & Reporting Requirements; Terms and Conditions; #3)

For closed landfills, the document is not titled a JTD (only active sites have this designation). Final Postclosure Maintenance Plan is the term that should be used. We recommend updating this section.

Comment #11 (Waste Discharge Requirements Order; Page 52; Information Sheet)

For closed landfills, the document is not titled a JTD (only active sites have this designation). Final Postclosure Maintenance Plan is the term that should be used. We recommend updating this section.

Comment #12 (Waste Discharge Requirements Order; Page 52; Information Sheet)

The abandoned, non-hazardous oil field waste processing facility was located on a five-acre parcel within the southwest corner of the Facility.



185-350-54

185-350-55

189-360-02

189-300-34

189-300-07

189-300-06

189-300-23

189-300-24

189-300-18

189-300-16

189-290-25

189-290-09

189-290-07

189-300-21

189-300-19

185-350-59

185-350-60

189-330-27

Arvin Sanitary Landfill

189-330-03

189-330-06

189-330-10

189-340-34

189-340-08

189-340-10

189-340-11

189-330-08

189-330-25

189-330-22

189-330-23

189-330-12

189-340-13

185-350-67

185-350-62

189-330-26

189-330-14

189-330-13

445-011-19

445-011-23

445-011-24

445-011-42

445-011-39

446-021-01

446-021-02

446-021-03

446-021-08

446-022-02

446-022-03

445-011-43

445-011-40

446-021-05

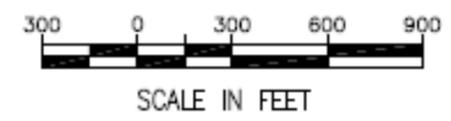
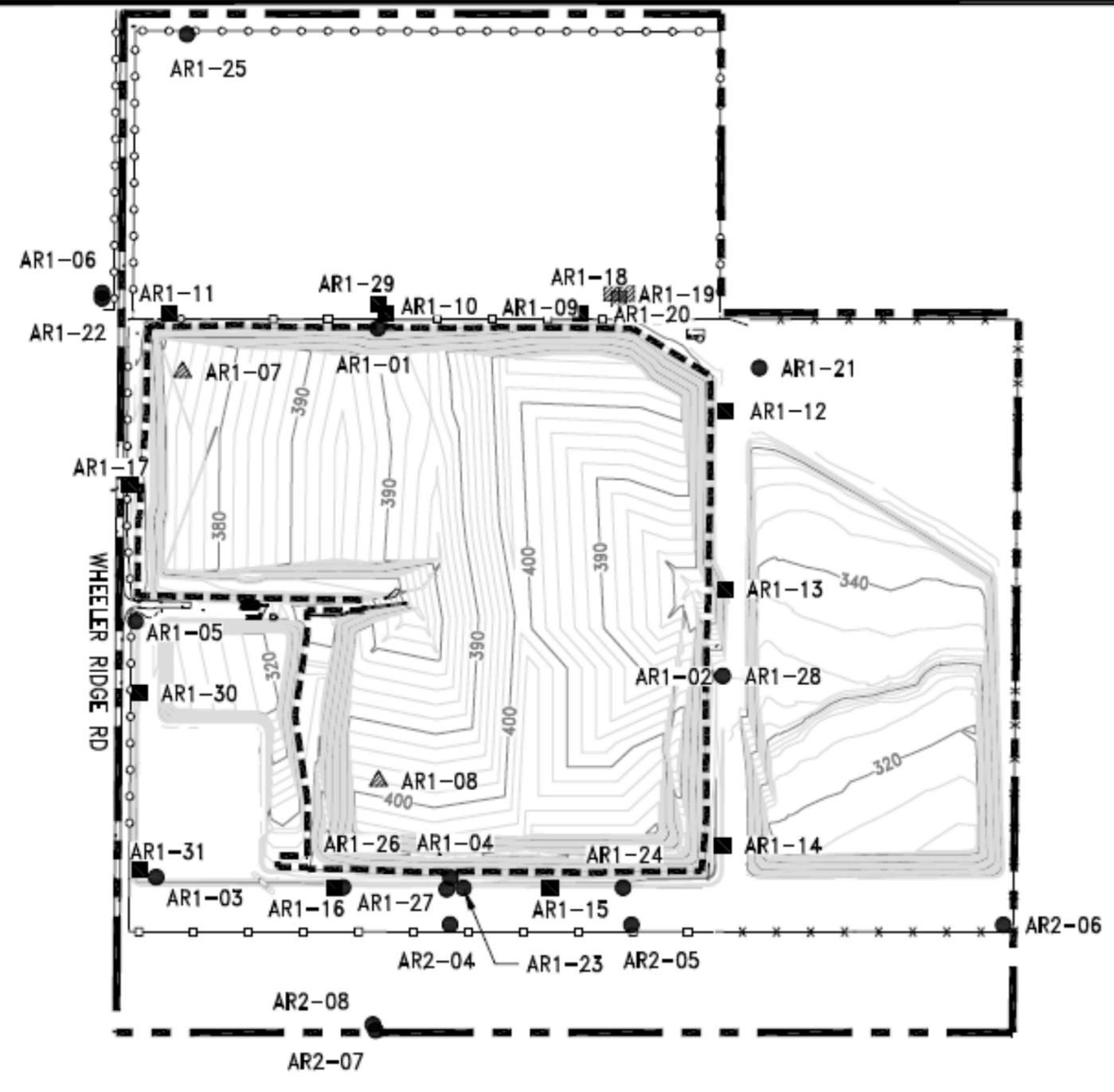
446-023-01

446-023-03

446-023-05

446-023-07

\\DSAFLE01\VOL1_WMD\WORKGRPS\DESIGN\1-SITE PROJECTS\TECHNICAL RESOURCES\POST CLOSURE MAINTENANCE PLAN\ARVIN\2016\FIG-4.DWG, 4/25/2016 11:38 AM, 11x17BW-HALFTONES, VIKER, RUBIO



LEGEND

- GROUNDWATER MONITORING WELL
- LANDFILL GAS MONITORING WELL
- ▲ MOISTURE BLOCK
- ⊙ DESTROYED GROUNDWATER MONITORING WELL
- ⊠ DESTROYED GAS MONITORING WELL
- ⊡ DESTROYED MOISTURE BLOCK
- - - - - APPROXIMATE LIMIT OF REFUSE
- PROPERTY BOUNDARY

***NOTES:**

- 1.) WELLS AR1-06, AR1-23, AND AR2-08 MONITOR A DEEPER ZONE AND THEREFORE ARE NOT CONSIDERED IN DETERMINING GROUNDWATER ELEVATION CONTOURS.
- 2.) TOPOGRAPHY DATE: 2012 CLOSURE DESIGN GRADE

FOR ILLUSTRATION PURPOSES ONLY

AR2-03 ● AR2-02 ●

KERN COUNTY PUBLIC WORKS DEPARTMENT
BAKERSFIELD, CALIFORNIA

APPROVED BY:	MB
REVIEWED BY:	RP
DRAWN BY:	VR
SCALE:	1"=700'
FILE NO:	FD-4

ARVIN SANITARY LANDFILL	FIGURE
FINAL CLOSURE MONITORING SYSTEM	4