

October 27, 2023

**“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  
McFarland-Delano Sanitary Landfill  
Kern County, California  
WDID No. 5D150303010**

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) and Monitoring and Reporting Program (MRP) for the McFarland-Delano Sanitary Landfill. Along with this Cover Letter is the McFarland-Delano WDR and MRP PDF Comments Supporting Document, which contains the same comments that are listed below.

Both the Summary of Comments and the McFarland-Delano WDR and MRP Comments Supporting Document will be uploaded to GeoTracker on October 27, 2023.

If you have any questions, please do not hesitate to contact me at (661) 862-8975.

Sincerely,



Brandon Fontes, P.E.

# McFarland-Delano Landfill – Tentative Waste Discharge Requirements (WDRs)

October 27, 2023

## Kern County Public Works Department (KCPWD) Summary of Comments

Kern Property Profile	
<b>Property Information</b>	
Owner	COUNTY OF KERN
Billing Addr.	1115 TRUXTUN AV BAKERSFIELD CA 93301
APN	521-040-48-04
Parcel Num.	521-040-48-5
Site Addr.	11288 STRADLEY AV DELANO
Legal	SECTION 23 TOWNSHIP 25 RANGE 25 QUARTER NW
Acres	136.13
Use Code	6020 - COUNTY OF KERN
Prior APN(s)	521-060-13, 521-080-03, 521-080-05, 521-040-47, 521-060-01
Supervisory District	4 - David Coach

### Comment #1 WDR: Public Hearing (pdf page 3)

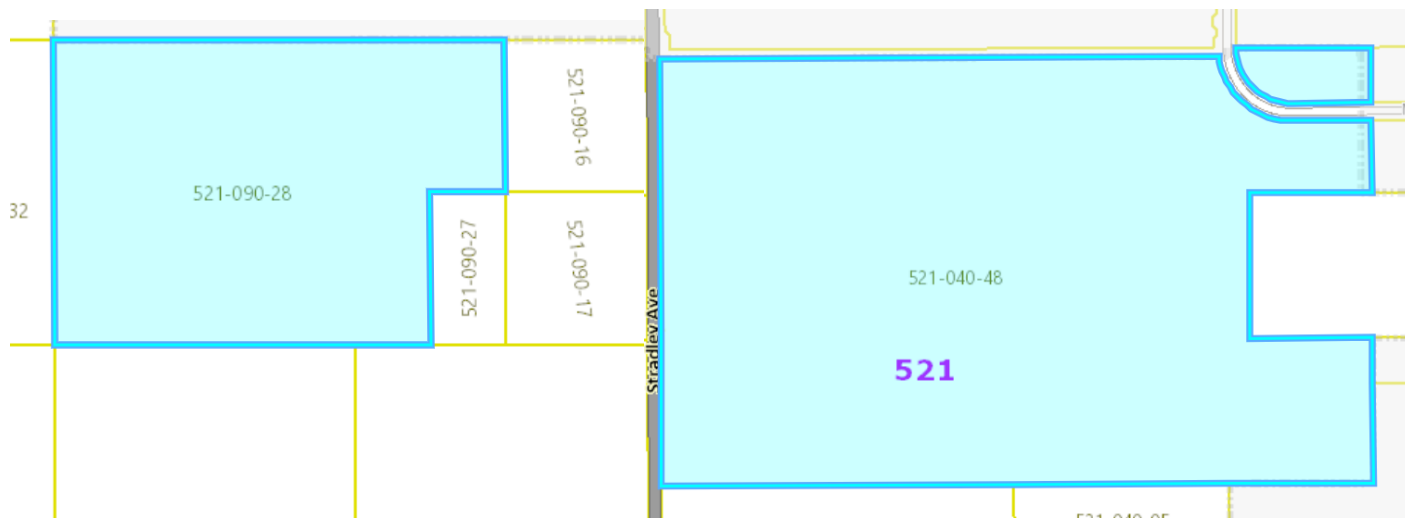
The approximate acreage of the facility is 136 acres. (from KC GIS)

### Comment #2 WDR: Title page (pdf page 6)

The Assessor's Parcel Numbers (APNs) are out of date.

KCPWD suggests updating the APNs to reflect the current parcel numbers:

Landfill: 521-040-48  
Transfer Station & Buffer: 521-090-28  
(from KC GIS)



### Comment #3 WDR: Glossary (pdf page 13)

LFG is normally just used for landfill gas, not landfill gas condensate. LFG is not used anywhere in this document. KCPWD suggests removing word "condensate".

Comment #4 WDR: Findings (pdf page 15)

Update the acreage and parcel numbers (see Comments 1 & 2).

The approximate acreage of the facility is 136 acres.

Landfill: 521-040-48

Transfer Station & Buffer: 521-090-28

Comment #5 WDR: Facility #10 (pdf page 16)

The flare was removed in 2022 and replaced with a carbon system. The carbon system began running January 9, 2023, and runs 24/7.

Comment #6 WDR: Monitoring and Corrective Action Requirements (pdf page 26)

KCPWD reached out to WSP to evaluate the DMP and CAP. The report is planned to be submitted by 4/1/24 deadline.

Comment #7 WDR: SPRRs #11 (pdf page 40)

Liners shall be designed and constructed to contain the fluid, including landfill gas, waste, and leachate [Title 27, § 20330(a)].

LFG is not a fluid, was this supposed to be "landfill gas condensate"?

Comment #8 WDR: Information sheet (pdf page 66)

Update APNs listed:            Landfill: 521-040-48  
   Transfer Station & Buffer: 521-090-28  
   (See comment #2)

Comment #9 MRP: Title Page (pdf page 68)

Update APNs listed:            Landfill: 521-040-48  
   Transfer Station & Buffer: 521-090-28  
   (See comment #2)

Comment #10 MRP: Table of Contents Page (pdf page 71)

Heading says Waste Discharge Requirements, not Monitoring and Reporting Program.

Comment #11 MRP: Table 1 (pdf page 81)

Corrective Action Wells (MD3-02, MD3-06, MD3-07, and MD3-08) have been dry/going dry since 2021. KCPWD plans on replacing these wells in the future. Is on hold to ensure the wells will not come back after the recent wet seasons.

Comment #12 MRP: Table 3 (pdf page 82)

Nitrate is not listed as a constituent parameter in Table 3.

Comment #13 MRP: Surface Water (pdf page 84)

There are no unsaturated zone monitoring requirements for the Facility.

KCPWD believes this should read: There are no surface water monitoring requirements for the Facility.

Comment #14 MRP: Five-Year COCs (pdf page 85)

The most recent quinquennial monitoring event was 2Q 2023. It was reported on in the 1st half monitoring report submitted in August 2023. The 2023 Annual report referenced has yet to be submitted; it will be submitted in February 2024.

Comment #15 MRP: Table 10 E.6 Survey & Iso-settlement Map (pdf page 91)

The deadline listed does not match E.6. The last Iso Map was surveyed October 2020 and the report was dated Jan 7, 2021.

The next survey should be October 2025.

Comment #16 MRP: SMRs section h (pdf page 92)

h. Summaries of all Regular Visual Inspections conducted per **Section D.3.** during the reporting period.

Section D.3 is the Annual Facility Inspection, this should reference D.2 - Regular Visual Inspections

Comment #17 MRP: AMRs section i (pdf page 94)

To assess the progress of ongoing Corrective Action at the Facility, the following: the total of VOCs in groundwater during each monitoring event.

KCPWD requests more information on section I of the AMRs.

Do you want a table with total number of VOCs reported in the current monitoring event or do we need to go back since the CAP was approved?

Do you want VOC names and wells associated or just the total number?

CAP was approved Feb 2013,

Example:

2Q3Q 2013 - 16 VOCs

4Q2013\_1Q2014 - 11 VOCs

2Q3Q 2014 - 9 VOCs

4Q2014\_1Q2015 - 9 VOCs

2Q3Q 2015 - 7 VOCs

*Comment #18 MRP: Survey & Iso-settlement Map (pdf page 95)*

The Discharger shall submit all iso settlement maps prepared in accordance with **Section D.5.** (Title 27, § 21090, subd. (e).) The next maps are due on 2025.

This section does not match Table 10. The last Iso settlement map was surveyed Oct 2020. Next survey should be October 2025.

(See comment #15)

*Comment #19 MRP: Attachment D- Semi-Volatile Organic Compounds (FIVE-YEAR COCs) (pdf page 114)*

Polychlorinated biphenyls (PCBs; Aroclors) are in the list of constituents to be analyzed by USEPA Methods 8270C or 8270D. KCPWD requests that PCBs be analyzed by Method 8082 due to the lower MDL than the 8270 Methods.