

Central Valley Regional Water Quality Control Board
14/15 December 2023 Board Meeting

Response to Written Comments on
Tentative Waste Discharge Requirements for
County of Kern
McFarland-Delano Sanitary Landfill
Kern County

At a public hearing scheduled for 14/15 December 2023, the Regional Water Quality Control Board, Central Valley Region (Central Valley Water Board) will consider adoption of tentative Waste Discharge Requirements (WDRs) for the County of Kern (Discharger), McFarland-Delano Sanitary Landfill, Kern County for post-closure maintenance and corrective action. This document contains responses to written comments received from interested persons and parties in response to the tentative Order. Written comments from interested parties were required to be received by the Central Valley Water Board by 27 October 2023 in order to receive full consideration. Comments were received prior to the deadline from:

1. Brandon Fontes, County of Kern, 27 October 2023

Written comments from the above interested parties are summarized below, followed by the response of Central Valley Water Board staff.

DISCHARGER (COUNTY OF KERN) COMMENTS

DISCHARGER COMMENT #1 – Facility Acreage Revision

The approximate acreage of the facility is 136 acres.

RESPONSE:

The recommended revision will be made.

DISCHARGER COMMENT #2 – APNs Revision

The Assessor's Parcel Numbers (APNs) are out of date. The Kern County Public Works Department (KCPWD) suggests updating the APNs to reflect the current parcel numbers: Landfill: 521-040-48, Transfer Station & Buffer: 521-090-28 (from Kern County GIS).

RESPONSE:

The recommended revision will be made.

DISCHARGER COMMENT #3 – Glossary Revision

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".

RESPONSE:

The recommended revision will be made.

DISCHARGER COMMENT #4 – Acreage and APN Revisions

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.

RESPONSE:

Comment noted.

DISCHARGER COMMENT #5 – Onsite Systems Revision

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

RESPONSE:

The recommended revision will be made.

DISCHARGER COMMENT #6 – DMP and CAP Evaluation

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

RESPONSE:

Comment noted.

DISCHARGER COMMENT #7 – SPRRs LFG Revision

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"?

RESPONSE:

Comment noted. This is requirement is a direct quote from Title 27, § 20330(a).

DISCHARGER COMMENT #8 – Information Sheet Revision

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

RESPONSE:

The recommended revision will be made.

DISCHARGER COMMENT #9 – MRP Title Page Revision

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

RESPONSE:

The recommended revision will be made.

DISCHARGER COMMENT #10 – MRP Header

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

RESPONSE:

The recommended revision will be made.

DISCHARGER COMMENT #11 – Corrective Action Wells

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.

RESPONSE:

Comment noted.

DISCHARGER COMMENT #12 – Table 3 Revision

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

RESPONSE:

The constituent will be added to Table 3.

DISCHARGER COMMENT #13 – Surface Water Monitoring

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.

RESPONSE:

The recommended revision will be made.

DISCHARGER COMMENT #14 – COCs Revision

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.

RESPONSE:

The recommended revision will be made.

DISCHARGER COMMENT #15 – Survey & Iso-Settlement Map Revision

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.

RESPONSE:

The recommended revision will be made.

DISCHARGER COMMENT #16 – Regular Visual Inspection Revision

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.

RESPONSE:

The recommended revision will be made.

DISCHARGER COMMENT #17 – AMRs Information

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

RESPONSE:

Submit the information in tabular format, with total number of reported VOCs in the current monitoring event, as well as the information dating back to the approval of the CAP. Include the VOC names and wells associated, along with the total number.

DISCHARGER COMMENT #18 – Survey & Iso-Settlement Map Revision

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)

RESPONSE:

The recommended revision will be made.

DISCHARGER COMMENT #19 – PCBs Sampling Method

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.

RESPONSE:

The Discharger may use an alternative analytical test method (USEPA Method 8082) for PCBs, if the method is in accordance with General Provisions section A.4. of the MRP.