Central Valley Regional Water Quality Control Board
18/19 April 2024 Board Meeting

Response to Written Comments on
Tentative Waste Discharge Requirements for
County of Kern
Shafter-Wasco Recycling and Sanitary Landfill
Kern County

At a public hearing scheduled for 18/19 April 2024, 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), Shafter-Wasco Recycling and Sanitary Landfill, Kern County for continued operations, monitoring, 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 11 March 2024 in order to receive full consideration. Comments were received prior to the deadline from:

1. Brandon Fontes, County of Kern, 11 March 2024

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 Name

Recycling was left out of the name. The facility is the Shafter-Wasco Recycling and Sanitary Landfill.

RESPONSE:

The recommended revision will be made.

DISCHARGER COMMENT #2 – Table 1

Modules 4 and 5 are not included. Total permitted disposal area is 135 acres.

RESPONSE:

Modules 4 and 5 will be addressed in Future WDRs.

DISCHARGER COMMENT #3 – Site Conditions and Information Sheet

Site conditions #26: Groundwater beneath the facility is first encountered 95-120 feet below ground surface. Groundwater elevations range between 207-229 feet above mean sea level.

RESPONSE:

The recommended revision will be made.

DISCHARGER COMMENT #4 – Unit Construction item 51

The thickness of the OPS layer is listed as 2 ft. Not sure if this is a required minimum or a prescriptive amount for both the module floor and the side slopes?

RESPONSE:

Module 3 and all future expansion modules will have an operations layer of three feet, in accordance with the approved engineered alternative, which includes the side slopes. Module 2 used a previous liner design that included an operations layer of two feet.

DISCHARGER COMMENT #5 – Table 4

Estimated closure date for Modules 4 and 5 is 2044 (estimate from 2023 Capacity Study.

RESPONSE:

Modules 4 and 5 will be addressed in Future WDRs.

DISCHARGER COMMENT #6 – Table 6

Table 6 is a list of Waste Categories either accepted or excluded. The table shows condensate and leachate as Return Only to Module 1, meaning recirculation is allowed in this un-lined module. Module 1 is unlined and therefore unable to accept leachate and condensation.

RESPONSE:

The recommended revision will be made.

DISCHARGER COMMENT #7 – Attachment B – Facility Map

Facility map does not show modules 4 and 5. A site map from 2021 JTD is provided at the end of this document.

RESPONSE:

Modules 4 and 5 will be addressed in Future WDRs.

DISCHARGER COMMENT #8 – Unsaturated Zone Table 6

The three pan lysimeters (SWPL-1, SWPL-2, SWPL-3) monitor Modules 2 and 3. They do not monitor the unsaturated zone below Module 1.

Module 1 was constructed prior to the adoption of requirements for unsaturated zone monitoring. RWQCB agreed that it is infeasible to retrofit Module 1 with an unsaturated monitoring zone system.

The unsaturated zone monitoring system for Modules 2 and 3 consists of three pan lysimeters, one under each leachate collection and removal system (LCRS) sump).

RESPONSE:

The recommended revision will be made in the MRP.

DISCHARGER COMMENT #9 – Attachment D-PCBs

Polychlorinated biphenyls (PCBs; Aroclors) are included in attachment D (SVOCs by 8270C or 8270D). KCPWD requests that PCBs be analyzed by Method 8082 due to the lower MDL [method detection limits] than the 8270 Methods.

RESPONSE:

General Provision A.4 of the MRP allows for the Discharger to use alternative analytical test methods (including new USEPA-approved methods), provided that the alternative methods have MDLs equal to or lower than the analytical methods specified in the MRP and are identified in the approved Sample Collection and Analysis Plan.