Central Valley Regional Water Quality Control Board
20-21 February 2025 Board Meeting

Response to Written Comments on
Tentative Waste Discharge Requirements for
County of Kern

for

Taft Recycling & Sanitary Landfill
Kern County

At a public hearing scheduled for 20-21 February 2025, 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), Taft Recycling & Sanitary Landfill, Kern County, for operation, corrective action, construction, and monitoring. 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 3 January 2025 in order to receive full consideration. Comments were received prior to the deadline from:

1. Brandon Fontes, Kern County, 2 January 2025.

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

DISCHARGER COMMENTS

DISCHARGER COMMENT #1
MRP.B.2.a states the following:
The Facility's unsaturated zone monitoring network consists of the landfill gas (LFG) monitoring points specified in ***Table 6****. As of the date of this Order, the network meets the requirements of Title 27. (Title 27, § 20415, subd. (d).)*

The Taft RSLF does not have any LFG monitoring wells for vadose monitoring. The unsaturated zone is monitored by the lysimeters listed on Table 6 of the MRP, as well as Table 3 of the WDR. The landfill does have a perimeter monitoring network that is regularly monitored per Title 27 §20925.

RESPONSE #1:
The recommended revision will be made.

DISCHARGER COMMENT #2
MRP.E.1 states the following:
*The Discharger shall submit Semiannual Monitoring Reports (SMRs) on 1 August (1 Jan. to 30 June) and 1 February (1 July to 31 Dec.). S*MR due dates listed in text do not match due dates on Table 17. Historically, due dates are August 31 and February 28. KCPWD suggests text should be amended to match Table 17 due dates.

RESPONSE #2:
The recommended revision will be made.

DISCHARGER COMMENT #3
MRP E.2 states the following:
On 1 February of each year, the Discharger shall submit an Annual Monitoring Report (AMR) containing following materials and information: Date listed in MRP E.2 is inconsistent with Table 17. KCPWD recommends amending text in MRP E.2 from Feb 1 to April 30.

RESPONSE #3:
The recommended revision will be made.

DISCHARGER COMMENT #4
MRP F. (Record Retention) states the following:
The Discharger shall maintain permanent records of all monitoring information, including without limitation: calibration and maintenance records; original strip chart recordings of continuous monitoring instrumentation; copies of all reports required by this MRP; and records of all data used to complete the application for WDRs. Such records shall be legible, and show the following for each sample.

MRP does not state how long records are to be maintained. KCPWD requests a timeframe be listed or clarification on “permanent records” be made.

RESPONSE #4:
Records should be maintained for the life of the landfill and during the post-closure maintenance period.

DISCHARGER COMMENT #5
Finding 2. The Facility is situated on an approximately 172-acre property comprised of Assessor’s Parcel Number (APN) 298-050-16. The address associated with the Facility is 13351 Elk Hills Road, Taft, California.

While 298-050-16 is owned by KCPWD, the refuse limit are located on APN 298-050-44. KCPWD recommends amending the text to 298-050-44.

RESPONSE #5:
The recommended revision will be made.

DISCHARGER COMMENT #6
Finding 50. On 28 June 2021, the Discharger submitted a Preliminary Closure and Post-Closure Maintenance Plan (Preliminary CPMP) in their JTD, which indicates that the Facility’s active/future WMUs are scheduled to be closed by 2071.

Finding 51. The Discharger's Preliminary CPMP, dated June 2021, is the operative document providing for post-closure maintenance of all WMUs for the entire post-

closure maintenance period of at least 30 years, and until it is demonstrated that the Facility no longer poses a threat to the public health and safety and the environment. (See Title 27, §§ 20950, subd. (a)(1), 21180, subd. (a).)

Findings 50 (Unit Closures) & 51 (Post-Closure Maintenance & Financial Assurances), cite CPMP dated 'June 2021'. GeoTracker submission shows JTD was submitted August 2023. KCPWD suggests updating the text in findings 50 and 51 to read 'August 2023'

RESPONSE #6:

The recommended revision will be made.