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

Response to Written Comments on
Tentative Waste Discharge Requirements for
Merced County Regional Waste Management Authority

for

Billy Wright Solid Waste Landfill
Merced 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 Merced County Regional Waste Management Authority (Discharger), Billy Wright Solid Waste Landfill, Merced 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 to receive full consideration. Comments were received prior to the deadline from:

1. Patrick Womble, Merced County Regional Waste Management Authority, 20 December 2024.

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
Should MW-7 be included on this table [Table 2, WDRs] as a "Planned" evaluation well for Surface Impoundment 1?

RESPONSE #1:
The recommended revision will be made so that MW-7 is included in Table 2 of the WDRs.

DISCHARGER COMMENT #2
Request language be added here [Monitoring Specification G.13] to allow the CAP evaluation report to be included as part of the annual M&RP report.

RESPONSE #2:
The recommended revision will be made.

DISCHARGER COMMENT #3
Should MW-7 be included on this table [MRP, Table 1] as a "Planned" evaluation well for Surface Impoundment 1?

RESPONSE #3:
The recommended revision will be made so that MW-7 is included in Table 1 of the MRP.

DISCHARGER COMMENT #4
Request Annual sampling frequency as in current MRP [MRP, Table 11].

RESPONSE #4:
The recommended revision will be made.

DISCHARGER COMMENT #5
Request Annual reporting frequency as in current MRP [MRP, Table 11].

RESPONSE #5:
The recommended revision will be made.

DISCHARGER COMMENT #6
Leachate Sampling Frequency
Section D(1)(c), Table 11 of the MRP proposes increasing the leachate sampling frequency from semi-annually to quarterly, and the corresponding reporting frequency from annually to semiannually. These changes are considered to be overly onerous from an additional cost perspective (i.e., sampling, laboratory testing, and reporting) and will not yield any appreciable benefits from a management/operational perspective. The waste cells have been designed and constructed to minimize the potential for a leachate release and to provide for early detection (pan lysimeter sampling), so the corresponding monitoring requirements should reflect these provisions.

It is our opinion that the existing annual monitoring and reporting frequencies are adequate for the intended purpose and that the benefits resulting from the increased data collection efforts do not justify the corresponding additional costs.

RESPONSE #6:
The recommended revision will be made.

DISCHARGER COMMENT #7
We request language be added for conditional approval of high liquid wastes (less than 50% solids) that are not dewatered sewage or water treatment sludges, in the WDRs based on submission and approval of stability and HELP model updates.

RESPONSE #7:
In accordance with Title 27, section 20200(d)(3), exceptions can be granted to allow for the discharge of liquids or semi-solid waste (i.e., waste containing less than 50 percent solids, by weight), other than dewatered sewage or water treatment sludge as described in § 20220(c) to Class III landfills if the discharger can demonstrate that such discharge will not exceed the moisture-holding capacity of the landfill, either initially or as a result of waste management operations, compaction, or settlement, so long as such discharge

is not otherwise prohibited by applicable state or federal requirements. This waste will be evaluated on a case-by-case basis, based on modeling results. Discharge Specification B.1 will be revised as follows (deletes the word “only” with no changes to the table):

1. The Discharger shall ~~only~~ discharge waste to Facility WMUs as specified in Table 5, subject to the table-specific definitions provided below.