Regional Water Quality Control BoardCentral Valley
Region Board Meeting
19/20 June 2025

Response to Written Comments for
County of Yolo, Department of Community Services
Yolo County Central Landfill
Tentative Waste Discharge Requirements

In a 4 April 2025 Notice of Public Hearing, Regional Water Quality Control Board Central Valley Region (Central Valley Water Board) Staff circulated tentative Waste Discharge Requirements (WDRs) for the Yolo County Central Landfill in Yolo County with the intent of consideration by the Central Valley Water Board at a public hearing held on 19/20 June 2025.

This document contains responses to written comments received from interested persons regarding the tentative WDRs. Written comments were required by public notice to be received by the Central Valley Water Board by 5 May 2025 to receive full consideration. Timely comments were received from the following interested persons:

- County of Yolo, Department of Community Services (Discharger) dated 2 May 2025 and 5 May 2025.

- Northern Recycling, LLC, dated 16 April 2025

Written comments are summarized below, followed by a response from Central Valley Water Board Staff. Central Valley Water Board Staff also made changes to the tentative WDRs to improve clarity and fix typographical errors.

DISCHARGER'S COMMENTS

DISCHARGER COMMENT 1: For Finding 7, Table 1—Summary of Waste Management Units (WMUs) Permitted Under Order, WMU 6C through WMU 7P are listed as Class II units, they should be listed as Class III units. Also, the facility acreage for Compost Facility #2 requires adjustment. Compost Facility 2, Phase 1 should be listed as 30.35 acres and Phase 2 as 13.4 acres for a total of 43.75 acres to match the area identified on the landfill's Solid Waste Facility Permit.

RESPONSE: Central Valley Water Board Staff corrected the tentative WDRs.

DISCHARGER COMMENT 2: For Finding 12(a) - Class II and Class III non-hazardous MSW landfill operations; this might need clarification that municipal solid waste operations are Class III and the surface impoundments are Class II.

RESPONSE: Central Valley Water Board Staff clarified tentative WDRs Finding 12(a).

DISCHARGER COMMENT 3: For Finding 12(c), the debris storage area was originally constructed as a gravel area but was recently paved with asphalt concrete to reduce wear and decrease dust.

RESPONSE: Central Valley Water Board Staff corrected the tentative WDRs.

DISCHARGER COMMENT 4: For Finding 12(d), we are unclear on the reference to a storage area.

RESPONSE: Central Valley Water Board Staff revised Finding 12.d to clarify that the subject inert material storage area is north landfill WMU 6E2.

DISCHARGER COMMENT 5: For Finding 12(f), we believe this references our original pilot scale anaerobic compost cell which was removed and replaced with the seven anaerobic compost cells comprised of Compost Facility #1. Refer to Finding 29 and 92 from WDR R5-2016-094.

RESPONSE: Central Valley Water Board Staff corrected Finding 12.f to describe the seven (7) anaerobic composite-lined compost cells of Compost Facility #1 rather than the former pilot scale anaerobic composting operation which existed in the same area of the Facility.

DISCHARGER COMMENT 6: For Finding 13, a mining permit issued by the State of California, Department of Conservation has been issued and would be appropriate to reference. The California Mine Identification number for the borrow site is 91-57-0021.

RESPONSE: Central Valley Water Board Staff amended the finding to note that the State of California, Department of Conservation assigned the mine Identification number “91-57-0021” to the Borrow Site.

DISCHARGER COMMENT 7: For Finding 14, add to the end of the first sentence “via a dedicated discharge line.”

RESPONSE: Central Valley Water Board Staff amended the finding as requested.

DISCHARGER COMMENT 8: For Finding 26, in most correspondence we refer to the activities covered by WDR R5-2002-0078 as the Groundwater Disposal System (GDS). If possible, we prefer this definition or at least a reference to this for continuity with previous documents.

RESPONSE: WDR R5-2002-0078 does not use the term “Groundwater Disposal System” or “GDS.” Central Valley Water Board staff believe tentative WDRs Finding 26 as written, provides an accurate description of the activities regulated by WDRs Order R5-2002-0078. However, to support continuity of the record, Central Valley Water Board staff amended Finding 26 to include the following: “In some historical correspondences, the Discharger describes the subject activities covered by WDRs Order R5-2002-0078 as relating to a “Groundwater Disposal System” or “GDS.”

DISCHARGER COMMENT 9: For Finding 43, if possible, we request the ability to dispose of treated wood waste composite waste management units consistent with applicable regulations.

RESPONSE: Central Valley Water Board Staff revised Finding 43 to describe the Discharger proposal to discharge Treated Wood Waste, as defined per Health and Safety Code section 25230.1 et seq., at the Facility. In accordance with the Health

and Safety Code, tentative WDRs R5-20XX-XXXX would authorize the discharge of treated wood waste to landfill WMUs specified in Section B1 and Table 19, provided that the Discharger complies with Health and Safety Code sections 25230 et seq. and the applicable Standard Provisions and Reporting Requirements. Central Valley Water Board Staff further revised Discharge Specification B1 and Table 19 -- Authorized Waste Discharges at Facility Landfill WMUs to allow for the discharge of treated wood wastes to landfill WMUs 6-7.

DISCHARGER COMMENT 10: For Finding 53, WMU 3 was closed in 2007.

RESPONSE: Central Valley Water Board Staff corrected the tentative WDRs.

DISCHARGER COMMENT 11: For Findings 61, 62, 65, and 66 all planned future units will incorporate a 60-mil HDPE capillary break.

RESPONSE: Central Valley Water Board Staff corrected the tentative WDRs.

DISCHARGER COMMENT 12: For Finding 65, WMU 6G, Phase 1 is a planned unit and has not been constructed yet. Additionally, all planned future units will incorporate a 60-mil HDPE capillary break

RESPONSE: Central Valley Water Board Staff corrected the tentative WDRs.

DISCHARGER COMMENT 13: For Finding 67, though the entire WMU 6H is 22 acres, only a portion of this was developed in 2022, see attachment B, Facility map. This was done to ensure the eastern liner limit was at a crest rather than swale to ensure leachate containment. The next scheduled module development will complete WMU 6H as well as a portion of WMU 7J, again corresponding with the liner limit at a crest rather than swale.

RESPONSE: Central Valley Water Board Staff clarified tentative WDRs Finding 67.

DISCHARGER COMMENT 14: For Finding 68, WMUs 6F and 6H do not infringe on the “Land Application Area”. WMU 7I and 7K will infringe on the current “Land Application Area”.

RESPONSE: Central Valley Water Board Staff corrected the tentative WDRs.

DISCHARGER COMMENT 15: For Finding 73, the next planned module development will be the remainder of WMU 6H and a portion of 7J. This development will infringe on approximately 6 acres of the “West Parcel Land Application Area”. Recovery of this area can be accomplished by extending the “West Parcel Land Application Area” to the north approximately 325 feet. We request that this be included in the WDRs as an approved modification of the parcel to allow the development of our next waste unit.

Current WDR R5-2002-0078 for the GDS includes an O&M plan submittal for operational management of the system (including the LAA). This tentative order currently does not include an O&M plan requirement. Inclusion of an O&M plan requirement would provide a mechanism for addressing this finding and Facility Specification D(1).

RESPONSE: Central Valley Water Board Staff revised tentative WDRs R5-20XX-XXXX to require the Discharger to prepare and submit an annual Operation and Maintenance Plan for the LAA, which, at a minimum includes a crop and salt nutrient management plan.

DISCHARGER COMMENT 16: For Finding 75, grits and rags and dewatered sewage sludge (sludge) from various wastewater treatment plants within the County, as well as the Cache Creek Casino operated by the Yocha Dehe Wintun Nation Tribe are not accepted in WMU G but rather composite WMUs (WMU 6A-D, F and H).

RESPONSE: Central Valley Water Board Staff corrected tentative WDRs Finding 75 by moving the subject language to tentative WDRS Finding 12.

DISCHARGER COMMENT 17: For Finding 75(c), the second sentence, should be referring to being hydraulically connected to WMU H1, rather than WMU H3.

RESPONSE: Central Valley Water Board Staff corrected the tentative WDRs.

DISCHARGER COMMENT 18: For Finding 76(d), the second to last sentence, should be referring to being hydraulically connected to WMU H2, rather than WMU H3.

RESPONSE: Central Valley Water Board Staff corrected the tentative WDRs.

DISCHARGER COMMENT 19: For Finding 91(a), in the second to last sentence, recommend changing to “The Discharger reports that during wet winters, the LCRS drainage trenches can become inundated with groundwater.” This observed increase in leachate collection through LPS1 during wet seasons is markedly less since WMUs 1-5 that drain to LPS1 have been final closed. Please refer to reported discharge volumes from LPS1 included in self-monitoring reports.

RESPONSE: Central Valley Water Board Staff revised the tentative WDRs to describe the observed reduction in leachate volume following final closure of WMUs 1-4.

DISCHARGER COMMENT 20: For Finding 91(f), there is no requirement for dual containment pipe in the remainder of these tentative WDRs, we believe this is a typographical error and request it be removed.

RESPONSE: The subject language was included in error. Central Valley Water Board Staff corrected the tentative WDRs.

DISCHARGER COMMENT 21: For Finding 92(b)(iii), leachate collected from the WMU H4 leak detection system should be suitable for return to WMU H4, we request this option be allowed.

RESPONSE: Central Valley Water Board staff amended tentative WDRs Finding 92(b)(iii) to provide for leachate return from WMU H4 back to the WMU from which the leachate originated, WMU H4.

DISCHARGER COMMENT 22: For Finding 96, Table 2, the calculated theoretical leakage rate for the full impoundment of H3 is 51,469 gallons per day (GPD). The east and west sides are of equal area; therefore each side has a theoretical leakage rate of 25,734.5 GPD. Each side is also equipped with a 30 gallon per minute pump, therefore each side has a capacity of 43,200 GPD. In the future, the County may update the action leakage rates for proposed WMU H4 using alternate methodology for review as provided in Finding 94(d).

RESPONSE: Central Valley Water Board Staff revised Finding 96, Table 2. Central Valley Water Board Staff further revised Facility Specification C.16 to provide for use of an equivalent approved alternative method (including Giroud and Bonaparte, 1989) to calculate an ALR for a Class II surface impoundment supported by a demonstration that the calculated ALR is less than fifty percent (50%) of the LCRS hydraulic capacity.

DISCHARGER COMMENT 23: For Finding 100, Table 3 – Compost Facility #1 Cells, the compost cell designations should match Figure 17 of the Joint Technical Document (JTD).

RESPONSE: Central Valley Water Board Staff updated Finding 100, Table 3 – Compost Facility #1 Cells so that the compost cell designations match Figure 17 of the JTD.

DISCHARGER COMMENT 24: For Finding 106, Compost Facility #2, Phase 1 should be listed as 30.35 acres. The area of Phase 2 is correct. The combined area of both phases is 43.75 acres

RESPONSE: Central Valley Water Board Staff corrected the tentative WDRs.

DISCHARGER COMMENT 25: For Finding 130, the corresponding maximum fill height should be 141.4 based on the vertical datum shift.

RESPONSE: Central Valley Water Board Staff corrected Finding 130.

DISCHARGER COMMENT 26: For Finding 150, the water balance for the site identified eight drainage areas with four of them considered contact water which is managed in either the Class 2 surface impoundments or compost ponds 1-3. It appears these were omitted and are unclear as to why. Additionally, there appears to be discrepancies in the descriptions of the identified areas when compared to the water balance. Additionally, drainage areas 3 and 4 are not well defined in attachment H. We encourage you to refer to the previously submitted water balance for boundary limits and can provide an updated Attachment H figure if requested.

RESPONSE: Finding 150 relates to identification of potential surface water discharge points and mechanisms from the Facility. Title 27 requires that for each surface water body that the Central Valley Water Board establish a detection monitoring program which provides the best assurance of the earliest possible detection of a release from a WMU (Title 27, § 20415(c)(2)(B)). Whereas, Finding 161 describes watersheds as it relates to the Discharger's water balance for the Facility which

considers water management in various Facility Class II surface impoundments and ponds. Central Valley Water Board Staff clarified Finding 150 to indicate that the four (4) stormwater drainage areas relates to the potential for offsite discharge.

DISCHARGER COMMENT 27: For Finding 150(b), this area drains to Stormwater Pond 1.

RESPONSE: Central Valley Water Board Staff corrected the tentative WDRs.

DISCHARGER COMMENT 28: For Finding 150(d), Drainage Area 4 includes portions of WMUs 6A, 6B, 6C, 6F, 6H, all of WMUs 6D Phase 1 and 2 and non-contact storm water from Compost Facility 2. Stormwater from these areas is discharged to the Groundwater/Stormwater Reservoir and managed without off-site discharge as part of the groundwater disposal system. See previously referenced water balance Figure 1.

RESPONSE: Central Valley Water Board Staff corrected and clarified the tentative WDRs.

DISCHARGER COMMENT 29: For Finding 153, “the” preceding “Storm Water Pollution Prevention Plan” should be deleted.

RESPONSE: Central Valley Water Board Staff corrected the tentative WDRs.

DISCHARGER COMMENT 30: For Finding 155(g), permanent work to raise the perimeter levee was completed in 2022 with the reconstruction of WMU G. In addition, the second sentence refers to WMU 6D1, rather than WMU G.

RESPONSE: Central Valley Water Board Staff corrected the tentative WDRs.

DISCHARGER COMMENT 31: For Finding 169, Table 11, only four of the extraction wells (EW2, EW7, EW10, and EW16) are used as part of our groundwater monitoring well network. These wells are only used for analytical testing of downgradient groundwater conditions. The remaining extraction wells (EWs in the list) are only utilized for groundwater elevation control.

RESPONSE: The Facility has a complex well network where some of wells are used for multiple programs and/or WMUs. Table 11 is indented to identify all Facility monitoring wells. Central Valley Water Board Staff revised Finding 169, including Table 11, to clarify the intent to list all Facility wells and identify which wells are used to support groundwater quality monitoring.

DISCHARGER COMMENT 32: For Finding 171, Table 13 the unsaturated zone monitoring of Compost Ponds 1-3 are by suction lysimeter.

RESPONSE: Central Valley Water Board Staff corrected the tentative WDRs.

DISCHARGER COMMENT 33: For Finding 174, Table 15, there are only two potential discharge points for stormwater from the YCCL, SW-1 is the discharge point from the borrow site, SW-2 is the discharge point from Stormwater Pond 1. All non-contact stormwater from compost Facility 2 discharges to the groundwater/stormwater reservoir and is managed on-site as part of the groundwater disposal system.

RESPONSE: Central Valley Water Board Staff revised Finding 174, Table 15 to only include the two (2) potential offsite stormwater discharge points from the Facility, SW-1 and SW-2.

DISCHARGER COMMENT 34: For Findings 180-183, the nature of the Yolo County Central Landfill, an area landfill with contiguous liner systems, does not lend itself to identifying releases from individual units once surrounding units are developed. For instance, WMUs 6A-6D Phase 2 currently have contiguous liner systems and groundwater flow is to the north, towards the groundwater extraction system. Were a release to be detected along the north side of WMU 6A it would be infeasible to determine if that release were from WMU 6A, 6B, 6C, 6D Phase 1 or 6D Phase 2. We request information from the Water Board on how similar landfills have addressed this issue.

RESPONSE: It is generally the practice of Central Valley Water Board Staff to be available for and work with the regulated community, including the Discharger, to address and resolve complex technical challenges within the framework of the applicable requirements.

DISCHARGER COMMENT 35: For finding 248, Appendix R to the Joint Technical Document dated October 2023 provides the annual financial assurance calculation, fund balance and subsequent approval by CalRecycle that the closure fund balance for the Yolo County Central Landfill is adequate and meets all requirements of Title 27. Perhaps the confusion is in the naming of the fund referenced in the fund balance letter signed by the Yolo County Chief Financial Officer. For reference, we have attached the most recent (2024) approved closure fund balance and report. The requirement for submitting an updated cost estimate should be removed. Additionally, the reference for post-closure maintenance of WMU H4 should be removed as the plan and approved cost estimate is for clean closure of WMU H4, thus no post closure maintenance will be necessary.

RESPONSE: The closure fund balance and report provided by the Dischargers included current fund balances and a copy to a duly executed agreement between the County and CalRecycle which established a pledge of revenue to demonstrate financial responsibility for postclosure maintenance of the Facility in accordance with Title 27 §§ 22228 and 22245. The tentative WDRs have been revised to reflect this updated information.

However, please note that the corrective action cost estimate does not satisfy the requirements of Title 27 because the March 1994 estimate has not been updated since 1994. Similarly, the Corrective Action Fund does not consider an update to the March 1994 Water Release Corrective Action Plan cost estimate which would be required by Tentative WDRs R5-20XX-XXXX.

Regarding WMU H4, Finding 248 has been revised to reflect the Discharger's proposed plan to clean close WMU H4. 20XX.

DISCHARGER COMMENT 36: For Finding 249, see DISCHARGER COMMENT 35.

RESPONSE: The closure fund balance and report provided by the Discharger (see DISCHARGER COMMENT 35) included current fund balances and a copy of the duly executed agreement between the County and CalRecycle which established a pledge of revenue to demonstrate financial responsibility for postclosure maintenance of the Facility in accordance with Title 27 §§ 22228 and 22245. Central Valley Water Board Staff revised 20XXFinding 249 to clarify that the Discharger's closure fund, corrective action fund, and the duly executed Pledge of Revenue meet the minimum amounts required for the respective cost estimates.

DISCHARGER COMMENT 37: For Finding 250, see DISCHARGER COMMENT 35.

RESPONSE: Central Valley Water Board Staff revised20XX Finding 250 to clarify that the Discharger is required to maintain financial assurances with CalRecycle in at least the amounts required by minimum fund balances calculated pursuant to Title 27 section 22225(a)(2)(B) for the Estimated Cost amounts specified in **Table 17**, adjusted for inflation annually. See also Response to DISCHARGER COMMENT 35 and 36.

DISCHARGER COMMENT 38: For Finding 261, "BPTC" is not defined in the order, please include a definition.

RESPONSE: The Tentative WDRs define "BPTC" in Finding 257 and the Glossary as "Best Practicable Treatment and Control. Central Valley Water Board staff did not make changes to Finding 261.

DISCHARGER COMMENT 39: The tentative WDRs should also rescind WDRs Order R5-2002-0078.

RESPONSE: Central Valley Water Board staff revised the action to rescind WDRs Order R5-2016-0094 and R5-2002-0078 and terminate NOA 2020-0012-DWQ-R5S001.

DISCHARGER COMMENT 40: For Discharge Specification B.1, Table 19, see DISCHARGER COMMENT No. 9 regarding disposal to Treated Wood Waste in composite lined units WMUs 6-7.

RESPONSE: Central Valley Water Board Staff revised Discharge Specification B1 and Table 19 -- Authorized Waste Discharges at Facility Landfill WMUs to allow for the discharge of treated wood wastes to landfill WMUs 6-7. See also Response to Discharger Comment No. 9.

DISCHARGER COMMENT 41: For Facility Specification C.6, the typical design details included in Attachment I provide a secondary geomembrane installed as a "capillary break". We are concerned that the "including capillary fringe" portion of this specification could be interpreted as requiring this secondary liner be installed above the capillary fringe rise, which would require significantly more fill and negate the purpose of this containment feature.

RESPONSE: Facility Specification C.6 begins "Except for as described in Facility Specification C.7 and C.8," where facility Specification C.8 relates to the Engineered Alternative Design described in Attachment I (see Findings 203, 204, 205, and 206).

Notwithstanding, Central Valley Water Board revised Facility Specification C.6 to clarify, that design, construction, and operation of landfill WMUs shall ensure that wastes, including leachate consider the capillary fringe.

DISCHARGER COMMENT 42: For Facility Specification C.18, WMUs will be constructed with leak detection sumps, and vadose zone pan lysimeters. There will also be detection monitoring wells in appropriate locations to monitor for release from the WMUs. Based on the WMU layout, detection monitoring wells may be used for more than one WMU.

RESPONSE: Facility Specification C.18 would require that "a]ll new WMUs shall be constructed with leakage and evaluation monitoring points." Central Valley Water Board Staff revised Facility Specification C.18 to remove the word "dedicated" from the specification.

DISCHARGER COMMENT 43: For Facility Specification C.20, the Discharger currently requires customers provide information on waste generation, a certification that the waste is not hazardous, a non-hazardous waste manifest with each load and in the vast majority of cases representative analytical data. The primary exception to this is septage and portable toilet waste. Requiring sampling and analytical testing of each load would provide an undue burden to the residents of Yolo County who rely on septic tanks or the businesses that utilize portable toilets. In many areas, these types of loads are discharge directly to a sanitary sewer system or Publicly Owned Treatment Works (POTW). We request that this requirement be modified to exempt these waste streams.

RESPONSE: Facility Specification C.20 requires the Discharger to confirm the character of wastes that are suspected to have originated in areas of contamination before discharging such wastes to surface impoundment WMU G. The intent is to ensure that hazardous or otherwise prohibited wastes are not discharged to WMU G. Facility Specification C.20 does not require the Discharger to obtain "a non-hazardous waste manifest with each load," including portable toilet wastes, nor does it prevent the Discharger from doing so. Facility Specification C.20 identifies multiple methods for the Discharger to demonstrate compliance therewith. Central Valley Water Board staff believe that Facility Specification C.20, as written, provides flexibility for the Discharger to develop a reasonable written waste acceptance program for WMU G which both 1.) aligns with the generally varied nature of the Discharger's customers' wastes accepted at WMU G; and 2.) ensures and, when necessary, demonstrates that no hazardous wastes or otherwise prohibited wastes are, have been, or will be discharged to WMU G. Central Valley Water Board staff revised tentative WDRs Facility Specification C.20 to allow the Discharger to utilize a "representative generalized characterization" of portable toilet and septage derived wastes as an alternative to characterizing each portable toilet and septage load discharged to WMU G.

DISCHARGER COMMENT 44: For Facility Specification C.22, the Discharger is not proposing to hydraulicly connect WMU H3 and H4. In the event an emergency transfer of liquid is required, a temporary pump and piping would be utilized to transfer liquid.

RESPONSE: In Central Valley Water Board Staff experience, as-built WMU configurations tend to vary (within reason) from original design plans. A request for temporary, quasi-permanent, or permanent hydraulic connections between WMU H3

and WMU H4, at design, during construction or after final construction, is foreseeable. The intent of Facility Specification C.22 is to prevent unintentional and/or uncontrolled flow of wastes from WMU H3 to WMU H4, as such a requirement for backflow prevention remains appropriate if, in the future, the Discharger seeks to connect WMU H3 and WMU H4. Notwithstanding, Central Valley Water Board staff modified Facility Specification C.22 to note that the requirement only applies to "any installed hydraulic connections between WMU H3 and WMU H4."

DISCHARGER COMMENT 45: For Facility Specification C.32.g, biosolids can be removed as an acceptable feedstock.

RESPONSE: Central Valley Water Board Staff removed "biosolids" as a listed acceptable feed stock from Facility Specification C.32.

DISCHARGER COMMENT 46: For Facility Specification C.37, suction lysimeters are installed below each compost pond.

RESPONSE: Central Valley Water Board Staff removed "pan" from the tentative language in Facility Specification C.37.

DISCHARGER COMMENT 47: For Construction Specification D.1, Construction of landfill WMUs 7I, 7J, 7K, 7L, 7M, 7N, 7O, and 7P is prohibited unless and until the Discharger initiates authorized alternatives to the discharge of wastes relating to the activities described in Finding 69, 70, 71, and 72.

RESPONSE: See Response to Discharger's Comment No. 15.

DISCHARGER COMMENT 48: For Construction Specification D.3, we believe this should reference the 100-year, 24-hour storm.

RESPONSE: Waste management units and their respective containment structures shall be designed and constructed to limit, to the greatest extent possible, ponding, infiltration, inundation, erosion, slope failure, washout, and overtopping under the precipitation conditions specified in Title 27, § 20320 Table 4.1 (See Standard Provision F.6 and Title 27, § 20365(a)). The subject Table 4.1 establishes that for Class II WMUs and the Design Storm is the 1,000-year, 24-hour precipitation conditions; and for Class III WMUs, the Design Storm is the 100-year, 24-hour precipitation conditions. Central Valley Water Board Staff revised Construction Specification D.3 to clarify the requirement.

DISCHARGER COMMENT 49: For Construction Specification D.6, the Discharger generally does not take exception to this requirement; however, we request a timeline be included for the review process by the Water Board. Table 22 includes a requirement that plans be submitted at least 90 days prior to unit construction however in several recent instances, the water board review process has not begun for over a year, putting an undue burden on the discharger to wait while Water Board staff "has time" to review plans. We request the following sentence be added "Unless such review has not been completed within 90 days of submittal of the construction plans, specifications, and CQA plans".

RESPONSE: Central Valley Water Board Staff endeavor to meet work plan commitments, including reviewing submissions in a prioritized and timely manner.

DISCHARGER COMMENT 50: For Construction Specification D.10(d), this should refence a two-foot thick compacted soil layer with maximum hydraulic conductivity of 1.0x10E-07 cm/s.

RESPONSE: Central Valley Water Board Staff corrected Construction Specification D.10(d), this should refence a two-foot thick compacted soil layer with maximum hydraulic conductivity of 1.0x10E-07 cm/s.

DISCHARGER COMMENT 51: For Compost Facility #2 Unit Construction, Specification E.10, the compost ponds at Compost Facility #2 have been constructed with suction lysimeters.

RESPONSE: Central Valley Water Board Staff removed “pan” from the tentative language in Compost Facility #2 Unit Construction, Specification E.10.

DISCHARGER COMMENT 52: For Groundwater / Stormwater Storage Reservoir G.8, should the levels in the groundwater/stormwater reservoir exceed 16 feet msl, measures to reduce the levels are limited. Discharge to the Land Application Areas fields are limited by Finding 261 that water be applied at agronomic rates, water cannot be discharged off-site as stormwater and discharge to the adjected City of Davis Waste Water Treatment Plant is economically burdensome. We request that this provision be delayed pending the results of the tasks identified in Table 22 Time Schedule.

RESPONSE: The requirement to limit stored liquid levels to less than 16.0 feet MSL (NAVD88) in the Groundwater / Stormwater Storage Reservoir is based on recommendations made in the Discharger’s 19 July 2019 Engineering Feasibility Study For Groundwater Separation Control (EFS). Central Valley Water Board understand that the results of the tasks identified in Table 22 Time Schedule are, in part, intended to refine and improve the EFS and may prove to support a different control elevation Groundwater / Stormwater Storage Reservoir. However, it is improper to ‘delay’ implementation of the control elevation Groundwater / Stormwater Storage Reservoir until those tasks are completed. If, in the future, the Discharger produces information which supports a different liquid level control elevation in the Groundwater / Stormwater Storage Reservoir, the Discharger should submit a Report of Waste Discharge and request revision to the WDRs. Notwithstanding, Central Valley Water Board Staff revised Groundwater / Stormwater Storage Reservoir G.8 and Other Provision N.3 to require the Discharger to specify procedures in the required Annual Impoundments Operation Plan for how the Discharger will “implement available measures to return liquid levels to 16.0 feet MSL (NAVD88)” in the Groundwater / Stormwater Storage Reservoir.

DISCHARGER COMMENT 53: For Closure and Post Closure maintenance Specification I.2, there is a typographical error, the Finding should refer to number “228.”

RESPONSE: Central Valley Water Board Staff corrected the tentative specification.

DISCHARGER COMMENT 54: For Closure and Post Closure maintenance Specification I.4, there is a typographical error, the Title 27 reference section should be “21190.”

RESPONSE: Central Valley Water Board Staff corrected the tentative specification.

DISCHARGER COMMENT 55: For Financial Assurances J.3, see DISCHARGER COMMENT 35, the due date for the financial assurances report to CalRecycle is August 28th and is based on the County’s end of fiscal year (June 30) and completion of annual aerial survey (also June 30) with sufficient time to evaluate the results. We request the same due date of August 28.

RESPONSE: Central Valley water Board staff deleted Financial Assurances J.3. See also Response to Discharger’s Comment Nos. Response to DISCHARGER COMMENT 35, 36 and 37.

DISCHARGER COMMENT 56: For Financial Assurances J.4, the due date for the financial assurances report to CalRecycle is August 28th and is based on the County’s end of fiscal year (June 30) and completion of annual aerial survey (also June 30) with sufficient time to evaluate the results. We request the same due date of August 28

RESPONSE: Central Valley Water Board Staff support the request. Central Valley Water Board Staff revised the tentative specification to require submission of the subject financial assurance report by 1 September, annually.

DISCHARGER COMMENT 57: For Table 22 – Time Schedule, in order to ensure that the items listed in Table 22 meet the Water Boards’ expectations, it would be helpful to have the Requirement section listed for the reports and tasks in the Time Schedule

RESPONSE: Table 22 – Time Schedule is intended to generally help the Discharger and the Public understand the schedule of upcoming expectations. However, by its nature Table 22 – Time Schedule is neither absolute nor comprehensive and as such is limited to serving as a summary of some of the requirements in the tentative WDRs R5-20XX-XXXX. For example, although a requirement of tentative WDRs R5-20XX-XXXX pursuant to Monitoring Requirement K.1, Table 22 – Time Schedule does not attempt to summarize the expectation that tentative MRP R5-20XX-XXXX B.4.h Concentration Limits, requires the Discharger By 1 April 2026 to prepare a revised WQPS report for Central Valley Water Board review and approval. The Discharger is ultimately responsible for ensuring compliance with tentative WDRs R5-20XX-XXXX (see Finding 7), regardless of the information included, or not included in Table 22 – Time Schedule.

DISCHARGER COMMENT 58: For Table 22 – Time Schedule, see DISCHARGER COMMENT No. 49.

RESPONSE: See Response to see DISCHARGER COMMENT No. 49.

DISCHARGER COMMENT 59: For Other Provisions N.11, see DISCHARGER COMMENT No. 58.

RESPONSE: See Response to see DISCHARGER COMMENT No. 49.

DISCHARGER COMMENT 60: For the Information Sheet discussion regarding Minimum Groundwater Separation From Waste in Unlined WMUs, enforcement actions for failure to maintain the 5-foot separation in WMUs 1-5 should be stayed provided the County complies with the Time Schedule included in the WDRs.

RESPONSE: As required by Title 27 section 20080(a), the tentative WDRs Order implements, as a minimum required standard, section 20240(c)'s five-foot separation requirement. The Discharger has not identified, and the Central Valley Water Board has not approved, an engineered alternative to this standard (see Title 27, § 20080(b)-(c)). Therefore, it is appropriate and necessary to maintain, without limitation, the requirement specified by section 20240(c). The Central Valley Water Board retains discretion to enforce this requirement, and a specified limitation of the ability to enforce this requirement (i.e., a stay) would constitute an impermissible variance from the prescriptive standards of Title 27. However, any potential enforcement determinations would take into account the Discharger's efforts to achieve compliance with this requirement, both in accordance with, and beyond, the requirements of the Discharger's operative WDRs.

DISCHARGER COMMENT 61: For the Information Sheet discussion regarding the "Dual Purpose WMU H4, WMU H4 will not be hydraulicly connected to WMU H3. In the second sentence, change H3 to H2. There will be installed piping, though not a free-flowing connection between H2 and H4.

RESPONSE: Central Valley Water Board Staff corrected the discussion in the Information Sheet. See also the Responses to DISCHARGER'S COMMENT NOS. 18 and 44 for additional information.

DISCHARGER COMMENT 62: For tentative Monitoring and Report Program (MRP) R5-20XX-XXXX, Detection Monitoring Program B.1.a – Table 1 – Groundwater Monitoring Network, only four of the extraction wells (EW2, EW7, EW10, and EW16) are used as part of our groundwater monitoring well network. These wells are only used for analytical testing of downgradient groundwater conditions. The remaining extraction wells (EWs in the list) are only utilized for groundwater elevation control.

RESPONSE: Central Valley Water Board Staff revised tentative MRP R5-20XX-XXXX, Detection Monitoring Program B.1.a – Table 1 – Groundwater Monitoring Network, to clarify the intent to list all Facility wells and identify which wells are used to support groundwater quality monitoring. See also the Response to DISCHARGER'S COMMENT NO. 31 for additional information.

DISCHARGER COMMENT 63: For tentative MRP R5-20XX-XXXX, Detection Monitoring Program B.1.b – Table 3 – Groundwater Detection Monitoring Parameters, current MRP R5-2016-0094 specifies short list Volatile Organic Compounds (VOCs) be monitored and reported semiannually. We believe the annual requirement may be a typographical error.

Additionally, dissolved inorganics Cobalt, Copper, Iron, Manganese, Nickel, Vanadium, and Zinc are currently specified as required annually in MRP R5-2016-0094. Data from decades of monitoring these constituents on an annual basis has shown no trends and

thus no justification for increased frequency. The County requests these constituents continue to be required annually.

The requirement for monitoring selenium in all detection monitoring wells is excessive. It is well established that the selenium in the YCCL shallow groundwater is naturally occurring. As such, the requirement for semiannual testing in all wells is without justification.

1,2,3 – Trichloropropane is listed with a sampling frequency of every 5 years but a reporting frequency of annual. Reporting frequency should list every 5 years.

RESPONSE: Central Valley Water Board Staff corrected tentative MRP R5-20XX-XXXX, Detection Monitoring Program B.1.b – Table 3 – Groundwater Detection Monitoring Parameters to require the following:

- Semiannual monitoring and reporting for short list Volatile Organic Compounds (VOCs).
- Annual monitoring and reporting of the dissolved inorganics cobalt, copper, iron, manganese, nickel, vanadium, and zinc.
- Sampling and reporting of 1,2,3 – Trichloropropane results once every five (5) years.

For selenium, the Discharger utilizes selenium accumulator plant species to phytoremediate extracted groundwater discharged to the LAA. The Discharger uses the harvested crops as ADC in lined Facility landfill WMUs, disposes of the harvested crops in landfill WMUs, or transports the harvested crops off-site for use as animal feed (Finding 125). Moreover, Selenium in effluent has the potential to degrade groundwater quality (Finding 258) and potentially exceed certain screening levels. As such monitoring selenium in groundwater at the Facility on a semiannual basis is appropriate.

DISCHARGER COMMENT 64: For tentative MRP R5-20XX-XXXX, Detection Monitoring Program B.2.a – Table 6 – Unsaturated Zone Monitoring Network, the lysimeters associated with Compost Ponds 1-3 are suction lysimeters. These are monitoring points Pond 1-A-Lys, Pond 1-B-Lys, Pond 2-A-Lys, Pond 2-B-Lys, Pond 3-A-Lys, and Pond 3-B-Lys.

RESPONSE: Central Valley Water Board Staff corrected tentative MRP R5-20XX-XXXX, Detection Monitoring Program B.2.a – Table 6 – Unsaturated Zone Monitoring Network to reflect “suction lysimeters” for the subject monitoring points.

DISCHARGER COMMENT 65: For tentative MRP R5-20XX-XXXX, Detection Monitoring Program B.2.d – Table 9 – Unsaturated Zone Detection Monitoring (Lysimeters) Physical Parameters, total dissolved solids (TDS) can be moved here from Table 10, as we typically do this as a field measurement, not a laboratory test.

RESPONSE: Field measurement values of TDS in a solution are indirect observations of the TDS concentration of a solution. Although many handheld devices display a TDS

concentration value, such a displayed TDS concentration value is inferred and inherently relies on 1.) The accuracy of a conversion factor applied by the handheld meter to the measured Conductivity of the solution; and 2.) Accurate calibration of the handheld meter by qualified and trained personnel. TDS concentration results, determined in a certified analytical laboratory are appropriate for determining compliance with tentative WDRs R5-20XX-XXXX. Central Valley Water Board Staff did not make any changes to tentative MRP R5-20XX-XXXX, Detection Monitoring Program B.2.d – Table 9 – Unsaturated Zone Detection Monitoring (Lysimeters) Physical Parameters.

DISCHARGER COMMENT 66: For tentative MRP R5-20XX-XXXX, Detection Monitoring Program B.2.d – Table 10 – Unsaturated Zone Detection Monitoring (Lysimeters) Constituent Parameters, current MRP R5-2016-0094 provides a sampling frequency of semiannual. This frequency has proved adequate and we do not believe a monthly monitoring frequency is justified. The sampling frequency on Table 10 should be changed to Semiannual. Total dissolved solids (TDS) can be moved to Table 9. A footnote should also be included to recognize that in most instances, insufficient liquid is generated in the lysimeters to complete the full suite of analytical testing and that the discharger will rotate through the parameters as samples are collected over time.

RESPONSE: Central Valley Water Board Staff corrected tentative MRP R5-20XX-XXXX, Detection Monitoring Program B.2.d – Table 10 – Unsaturated Zone Detection Monitoring (Lysimeters) Constituent Parameters to require the following:

- Require at least semiannually for the parameters listed in Table 10 (Constituent Parameters);

- Regarding TDS, see response to DISCHARGER'S COMMENT NO. 65.

DISCHARGER COMMENT 67: Describe that the priority of sampling/analysis, based on what may be a limited amount of liquid recovered from a lysimeter shall be as follows: TDS, chloride, sulfate, sodium, Short List VOCs, the remaining inorganic constituents, and then 1,2,3-Trichloropropane. For tentative MRP R5-20XX-XXXX, Detection Monitoring Program B.2.e – Table 11 – Unsaturated Zone Detection Monitoring (Lysimeters) Five-Year COCs, a footnote should also be included to recognize that in most instances, insufficient liquid is generated in the lysimeters to complete the full suite of analytical testing, and that the discharger will rotate through the parameters as samples are collected over time.

RESPONSE: Central Valley Water Board added a footnote to tentative MRP R5-20XX-XXXX, Detection Monitoring Program B.2.e – Table 11 – Unsaturated Zone Detection Monitoring (Lysimeters) Five-Year COCs clarifying the that priority of sampling/analysis, based on what may be a limited amount of liquid recovered from a lysimeter shall be as follows: TOC, SVOCs, Herbicides, Organo Phosphorus Compounds, and then Extended List VOCs.

DISCHARGER COMMENT 68: For tentative MRP R5-20XX-XXXX, Detection Monitoring Program B.3.4 – Table 12 – Surface Water Detection Monitoring Network, there are only two potential discharge points for stormwater from the YCCL, the SE corner of the borrow site (SW-1) and stormwater Pond 1 (SW-2). The remaining three stormwater

points (SW3-5) identified on the table were originally designated as part of Phase 1 of the composting facility and the need to obtain coverage under the General Industrial stormwater permit as required for obtaining coverage under the Compost General Order. All non-contact stormwater from the compost facility drains to the Groundwater/Stormwater Reservoir and as such, cannot be discharged off-site. SW3-5 should be removed from this table

RESPONSE: Central Valley Water Board Staff revised tentative MRP R5-20XX-XXXX, Detection Monitoring Program B.3.4 – Table 12 – Surface Water Detection Monitoring Network to only include the two (2) potential stormwater discharge points, SW-1 and SW-2. See also Response to DISCHARGER's Comment No. 33.

DISCHARGER COMMENT 69: For tentative MRP R5-20XX-XXXX, Detection Monitoring Program B.3.b – Surface Water – Sample Collection and Analysis, SW-1 and SW-2 are controlled discharge points from detention basins (either the borrow site or Stormwater Pond 1). During the wet season, water is always present in these basins but only periodically discharged. Current MRP R5-2016-0094 requires semiannual monitoring. We request this requirement be modified to "prior to discharge and at least semiannually".

RESPONSE: Central Valley Water Board staff revised tentative MRP R5-20XX-XXXX, Detection Monitoring Program B.3.b – Surface Water – Sample Collection and Analysis to require sampling "prior to discharge and at least semiannually."

DISCHARGER COMMENT 70: For tentative MRP R5-20XX-XXXX, Detection Monitoring Program B.3.b – Table 13 – Surface Water Detection Monitoring, Physical Parameters, refer to DISCHARGER COMMENT NO. 69 regarding sampling frequency. In addition, not all storm events generate runoff that could be evaluated for the physical parameters. Current MRP R5-2016-0094 does not require analysis for "Hardness" and we are unclear as to the need or justification. Is the intent Total Dissolved Solids (TDS)? Is the presence of "Oil and Grease" a visible sheen? Oil and Grease is one of the required monitoring parameters in the General Industrial Stormwater Permit, of which the YCCL has coverage. Monitoring constituents and frequencies should mirror this.

RESPONSE: Central Valley Water Board staff believe the response to DISCHARGER's COMMENT NO. 69 resolved the sampling frequency matter. Central Valley Water Board Staff revised tentative MRP R5-20XX-XXXX, Detection Monitoring Program B.3.b – Table 13 – Surface Water Detection Monitoring, Physical Parameters to remove the requirement to monitor and report the hardness of stormwater discharged offsite. Regarding compliance with the requirement to monitor for the "Presence of Oil and Grease," tentative MRP R5-20XX-XXXX requires the Discharger to affirm "Yes" or "No" if it observes the presence of oil and grease prior to discharge. Nothing in the tentative WDRs, including the tentative MRP, changes the Discharger's obligation to comply with other regulatory requirements, including the General Industrial Stormwater Parmit.

DISCHARGER COMMENT 71: For tentative MRP R5-20XX-XXXX, Detection Monitoring Program B.3.b – Table 14 – Surface Water Detection Monitoring Constituent Parameters, 1,2,3 – Trichloropropane is listed with a sampling frequency of every 5

years but a reporting frequency of semiannual. Reporting frequency should list every 5 years. Refer to DISCHARGER's COMMENT NO. 63.

RESPONSE: Central Valley Water Board Staff revised tentative MRP R5-20XX-XXXX, Detection Monitoring Program B.3.b – Table 14 – Surface Water Detection Monitoring Constituent Parameters to require sampling and reporting of 1,2,3 – Trichloropropane results once every five (5) years.

DISCHARGER COMMENT 72: For tentative MRP R5-20XX-XXXX, B.4, Summary of Water Quality Protection Standard (WQPS) components, we anticipate that the preparation of an updated WQPS report will involve not only a review of potential new COCs, but a review of the COCs where it is possible to demonstrate that they are not currently present or likely to become present in the landfill, surface impoundments, or other disposal activity at the Facility. This report will also discuss the detection monitoring or corrective action monitoring program status of WMUs, which wells are associated with each WMU, and potential methods for evaluating releases from WMUs that cannot be easily differentiated.

RESPONSE: Central Valley Water Board Staff expect that an updated WQPS report will also involve identification of background and point(s) of compliance groundwater monitoring wells. See also Responses to DISCHARGER'S COMMENT NOS. 31 and 62.

DISCHARGER COMMENT 73: For tentative MRP R5-20XX-XXXX, Groundwater Extraction and Treatment System B.5.d.iii, there is not enough regularly detected contamination to develop contour maps. This section should indicate that the goal is to provide a quick visual summary of the groundwater situation, for someone reading the reports.

RESPONSE: Central Valley Water Board Staff revised tentative MRP R5-20XX-XXXX, B.5.d.iii to include the following: "[i]f insufficient data exists to produce a contour map, the Discharger shall provide a reasonable visual summary based on the available data."

DISCHARGER COMMENT 74: For tentative MRP R5-20XX-XXXX, Land Application Area B.6, add Nitrate to the semiannual well sampling, since the land application area is part of the CV-SALTS nitrate control area.

RESPONSE: Central Valley Water Board Staff revised tentative MRP R5-20XX-XXXX Land Application Area B.6 to include semiannual monitoring and reporting of Nitrate (as Nitrogen).

DISCHARGER COMMENT 75: For tentative MRP R5-20XX-XXXX, Land Application Area B.6, what about collecting soil samples in the fall, after harvesting, but before any field prep?

RESPONSE: Tentative MRP R5-20XX-XXXX Land Application Area, B.6 requires soil sample collection in the Spring prior to irrigating the Land Application Area, consistent with the requirements in WDRs R5-2002-0078. Notwithstanding, to provide limited flexibility to collect samples representative of pre-season conditions, Central Valley

Water Board Staff revised tentative MRP R5-20XX-XXXX, Land Application Area B.6 to require soil sample collection after the final harvest in the Fall or Winter (whichever occurs later) and prior to irrigation of the Land Application Area in the Spring.

DISCHARGER COMMENT 76: For tentative MRP R5-20XX-XXXX Corrective Action Monitoring Program C, Table 23, there are multiple items listed in this table, some of which are not monitoring points. The extraction wells are not monitoring points. The headings in the table should be changed to “Corrective Action or Monitoring Device”, “Device Type”, “Related WMU(s)”, and “Corrective Action Program(s)”.

RESPONSE: Tentative MRP R5-20XX-XXXX Corrective Action Monitoring Program C, Table 23 identifies monitoring devices associated with groundwater corrective action, groundwater elevation control corrective action, and/or landfill gas corrective action system. Some monitoring devices are associated with multiple corrective action programs.

DISCHARGER COMMENT 77: For tentative MRP R5-20XX-XXXX Corrective Action Monitoring Program C.1, Table 24 – Additional Constituent Monitoring Parameters, current MRP R5-2016-0094 provides a sampling frequency of semiannual. This frequency has proved adequate, and we do not believe a monthly monitoring frequency is justified. We understand the intent was to keep the frequency the same as existing and this is a typographical error.

RESPONSE: Central Valley Water Board Staff tentative MRP R5-20XX-XXXX Corrective Action Monitoring Program C.1, Table 24 – Additional Constituent Monitoring Parameters to provide for semiannual sampling frequency.

DISCHARGER COMMENT 78: For tentative MRP R5-20XX-XXXX Corrective Action Monitoring Program C.2, Table 26 – Groundwater Extraction Well System, monitoring the extraction wells for groundwater elevation and using this to interpolate some manner of groundwater gradient from these wells does not make any sense. If these are operating properly, the groundwater depth or elevation in each well will be entirely dependent upon the draw down and recharge controlled by the automatic well pump system in each well. We recommend that a summary of the operation of the extraction wells be included in the semi-annual reporting (e.g., volume of water pumped, maintenance, downtime, etc.).

RESPONSE: Central Valley Water Board Staff disagree, it is important to monitor, evaluate, and report groundwater elevations, including to ensure the groundwater extraction system is, in fact, “operating properly.” Central Valley Water Board Staff note that tentative MRP R5-20XX-XXXX Detection Monitoring Program B.5.d. Groundwater Extraction Treatment System would require the Discharger to provide information relating to volume extracted and mass removed via the groundwater extraction and treatment system.

DISCHARGER COMMENT 79: For tentative MRP R5-20XX-XXXX Corrective Action Monitoring Program C.3 Landfill Gas Corrective Action, the description should include an acknowledgement that the Discharger installs some collection zone vertical gas wells during filling, as well as gas horizontal wells.

RESPONSE: Central Valley Water Board Staff revised tentative MRP R5-20XX-XXXX Corrective Action Monitoring Program C.3 Landfill Gas Corrective Action to include language indicating that the Discharger also installs vertical collection wells during active filling.

DISCHARGER COMMENT 80: For tentative MRP R5-20XX-XXXX Corrective Action Monitoring Program Table 27 – Landfill Gas Corrective Action Monitoring, Control System Performance, in landfill gas collection systems, system vacuum is typically measured and reported in Inches-Water. We request inches-water units be specified. In our system the landfill gas flow is measured in Standard Cubic Feet (SCF), or Standard Cubic Feet Per Minute (SCFM). The flow meters used on our gas system compensate for the temperature and moisture content of the LFG to read in these units. The information provided in this table is currently required as part of the normal reporting to the Yolo Solano Air Quality Management District. This report is currently provided to the Water Board with separate cover page, as its own report. The MRP should specify that continuation of this is acceptable.

RESPONSE: Central Valley Water Board Staff revised tentative MRP R5-20XX-XXXX Corrective Action Monitoring Program Table 27 – Landfill Gas Corrective Action Monitoring, Control System Performance to specify units of “inches-water” for reporting System Vacuum observations.

DISCHARGER COMMENT 81: For tentative MRP R5-20XX-XXXX Corrective Action Monitoring Program 3.a-- Table 28 Landfill Gas Corrective Action, the County is unclear as to the need and justification for sampling and reporting landfill gas constituents at this number of sample ports. Table 28 represents at least 29 sample points which will be overly burdensome regarding the VOC monitoring specified in Table 29. There are only two condensate sumps installed in WMU 6D2, U6D2-SP1 and SP2. The County has attached a figure with a revised proposed monitoring port list that we believe is more representative of landfill gas being generated from each unit or combined units (as applicable). Note that the landfill gas collection system at the YCCL is predominantly a “loop” system so there is the potential for gas flow in different directions and comingling of gas from multiple units. The table below is the summary of monitoring points suggested in the attached figure.

Unit	Monitoring Point	Comment
WMU 1	U01-SP2	Located on the South side of WMU1, should be predominantly LFG from WMU 1 regardless of flow direction.
WMU 2	U02-SP4	Located on lateral on North side of WMU 2 servicing 4 LFG wells.
WMU 3	U03-SP1	Combined sample point for all of WMU 3
WMU 4	U04-GA05	Only significant producing LFG well on WMU 4.
WMU 5	U5-SP1	Located on West side of WMU 5

WMU 6A	U6A-SP1	Located on West side of WMU 6A
WMU 6B	U6B-SP3	Located on lateral on West side of WMU 6C servicing 3 LFG wells.
WMU 6C	U6C-SP2	Centrally located LFG well on WMU 6D1.
WMU 6D1	U6D1-001	Centrally located horizontal LFG well on WMU 6D2.
WMU 6D2	U6D2-004	Landfill gas collection line installed in the LCRS layer of WMU 6F
WMU 6F	U6F-L102	Landfill gas collection line installed in the LCRS layer of WMU 6H
WMU 6H	U6H-L101	Landfill gas collection line installed in the LCRS layer of WMU 6H
WMU H2	IVD-SP1	Located on lateral servicing the IVD

RESPONSE: Central Valley Water Board revised tentative MRP R5-20XX-XXXX Corrective Action Monitoring Program 3.a-- Table 28 Landfill Gas Corrective Action to include the table recommended by the Discharger.

DISCHARGER COMMENT 82: For tentative MRP R5-20XX-XXXX Corrective Action Monitoring Program 3.a-- Table 29 – Landfill Gas Corrective Action, Extraction Sample Port / Well Network Monitoring Parameters, VOCs will be present in landfill gas, however based on the County's previous sampling during our various bioreactor projects, concentrations are higher with fresh waste and decline over time. The prescreening criteria included in footnote 1 will not eliminate any points from list included in Table 28. Additionally, VOC monitoring via TO-15 should be limited to only units in Corrective Action for potential contamination (WMUs 1-5, 6B and 6C). The remaining points should be limited to a 5-year COC frequency.

The requirement for initial and adjusted static pressure for header or lateral line sample points does not make sense, these are typically well head measurements, and the headers and laterals do not have adjustment capabilities. There would be no adjusted pressure. Additionally, temperature is not typically measured on lateral or header lines and further is highly influenced by general atmospheric conditions and color of pipe (e.g. hot in July and cold in January).

RESPONSE: Central Valley Water Board Staff revised tentative MRP R5-20XX-XXXX Corrective Action Monitoring Program 3.a-- Table 29 – Landfill Gas Corrective Action, Extraction Sample Port / Well Network Monitoring Parameters to remove the parameters Gas Temperature, Initial Static Pressure, and Adjusted Static Pressure and align required sampling events with VOC sampling events conducted pursuant to tentative MRP R5-20XX-XXXX Corrective Action Monitoring Program Table 27 – Landfill Gas

Corrective Action Monitoring, Control System Performance. For TO-15 monitoring frequency, Central Valley Water Board Staff revised tentative MRP R5-20XX-XXXX Corrective Action Monitoring Program 3.a-- Table 29 – Landfill Gas Corrective Action, Extraction Sample Port / Well Network Monitoring Parameters to remove "Footnote 1." The requirement for monitoring Volatile Organic Compounds per USEPA Method TO-15 annually is a reasonable balance since 1.) The Facility is known to produce LFG which contains VOCs;2.) The Discharger reports VOCs such as 1,4-Dichlorobenzene , Benzene, and Trichloroethene (TCE) in Facility groundwater monitoring results; 3.) Recent LFG VOC monitoring efforts at the Facility are insufficient to evaluate potential impacts to groundwater quality due to the partitioning of VOCS in LFG to groundwater; and 4.) Similarly sized landfills regulated by the Central Valley Waterboard are required to monitor Volatile Organic Compounds per USEPA Method TO-15 in LFG semiannually.

DISCHARGER COMMENT 83: For tentative MRP R5-20XX-XXXX Corrective Action Monitoring Program 3.b LFG Extraction Well Field, as discussed previously, VOCs will be present in landfill gas. The County provided proposed modification to the Table 28 monitoring points will provide representative data for each WMU in Corrective Action. As such, we request this requirement be eliminated.

RESPONSE: Central Valley Water Board Staff agree with the Discharger that the Facility landfill WMUs are reasonably expected to continue to generate LFG with detectable presence of VOCS. The ongoing generation of LFG with detectable presence of VOCS would require annual analyses of LFG VOCS at multiple sample ports, pursuant to Tentative MRP R5-20XX-XXXX Corrective Action Monitoring Program 3.b and potentially represent a significant burden. Because VOCs in landfill gas generated in a covered landfill WMU can impact groundwater quality, it is important and appropriate to regularly monitor and characterize LFG for VOCs. Central Valley Water Board Staff revised Tentative MRP R5-20XX-XXXX Corrective Action Monitoring Program 3.a, Table 29 – Landfill Gas Corrective Action, extraction Sample Port Network to require sampling LFG for VOCs per USEPA Method TO-15, where a 5-year sampling event required pursuant to tentative MRP R5-20XX-XXXX Corrective Action Monitoring Program Table 27 – Landfill Gas Corrective Action Monitoring, Control System Performance yield laboratory analysis detections of VOCs. See also Response to DISCHARGER's COMMENT NOS. 81 and 82.

DISCHARGER COMMENT 84: For tentative MRP R5-20XX-XXXX Additional Facility Monitoring D.1, Table 30 – Landfill Gas Offsite Migration Probe Network several Landfill Gas perimeter probes are missing from this table. Suggest replacing the table with this one:

LFG Probe	Modules Addressed
P1	WMU 3
P2	WMU 2
P3	WMU 2

P4A	WMU 2
P5	WMU 1
P6	WMU 1
P7	WMU 1
P8	WMU 3
P9	WMU 5
P10	WMU 6A
P11	WMU H2
P12	Abandoned during construction of WMU 6F
P-13	WMU 6F & 6H
P-14	WMU 6H
P-15	WMU 6A, 6F, 6H

RESPONSE: Central Valley Water Board revised tentative MRP R5-20XX-XXXX Additional Facility Monitoring D.1, Table 30 – Landfill Gas Offsite Migration Probe Network to include the table recommended by the Discharger.

DISCHARGER COMMENT 85: For tentative MRP R5-20XX-XXXX Additional Facility Monitoring 5.D.2, Table 33 – Sampling Frequency, in the current MRP R5-2016-0094, sampling for laboratory analysis in the leachate sumps and leachate pump stations is semi-annual. Due to the general stability of constituents detected in the sumps and pumps stations, there does not seem to be a benefit to increasing the frequency of analysis. We request that the semi-annual frequency be maintained.

RESPONSE: Central Valley Water Board Staff revised tentative MRP R5-20XX-XXXX Additional Facility Monitoring D.2, Table 33 – Sampling Frequency to provide for semiannual monitoring of the subject parameters.

DISCHARGER COMMENT 86: For tentative MRP R5-20XX-XXXX Additional Facility Monitoring 5.D.5.b. regarding the requirement that "[n]on-hazardous surface impoundment liquids utilized at the Facility in accordance with WDRs Order R5-20XX-XXXX shall be analyzed for the parameters listed in Table 2 and Table 3 and include the results in the Semiannual Monitoring Reports per Section E.1," does this language mean

surface impoundment liquids used site wide (such as for dust control), or only liquids used in operations at Compost Facilities?

RESPONSE: The language applies to liquids stored in all class II surface impoundments at the Facility regulated by and, *in accordance with WDRs Order R5-20XX-XXXX* (emphasis added). It appears the reference letter "b." was omitted from the tentative MRP. Central Valley Water Board Staff revised tentative MRP R5-20XX-XXXX Additional Facility Monitoring 5.D.5.b. to include the reference letter "b." and clarify that the requirement applies to "ponds" regulated by WDRs Order R5-20XX-XXXX. Central Valley Water Board Staff also revised the title of tentative MRP R5-20XX-XXXX, Table 37 to "Class II Surface Impoundment & Pond Sampling Parameters."

DISCHARGER COMMENT 87: For tentative MRP R5-20XX-XXXX Additional Facility Monitoring 5.D.10 – Load Inspection and Monitoring, the County currently requires the vast majority of its liquid waste customers to provide representative analytical data on liquid waste disposed at the YCCL surface impoundments. The above provision does not clearly provide this as an acceptable alternative to the County collecting and analyzing the samples. We request that the third sentence be modified to "In lieu of collecting samples, the discharger may utilize documentation from waste generators who collect representative sample(s) and analyze the collected samples and provide a laboratory analysis report on waste constituents."

As previously discussed, the requirement for analysis on all loads, particularly septage and portable toilet is unduly burdensome. These requirements mimic another nearby facility that accepts drilling mud from oil and gas exploration. The YCCL does not accept these wastes. Further, the County has well established Waste Acceptability Procedures (See appendix B of the JTD) which require analytical in most cases and manifesting of every load. This program has proved very successful as evidence by routine testing of water and residual sludge in the surface impoundments (See self monitoring reports). Given this, we request that this requirement be eliminated.

RESPONSE: Central Valley Water Boards Staff revised tentative MRP R5-20XX-XXXX Additional Facility Monitoring 5.D.10 – Load Inspection and Monitoring to attempt to clarify that qualifying generator derived documentation may be used in lieu of the Discharger collecting representative samples from vehicles and analyzing the collected sample to verify the wastes are not hazardous wastes or otherwise prohibited. Central Valley Water Board Staff further revised tentative MRP R5-20XX-XXXX Additional Facility Monitoring 5.D.10 – Load Inspection and Monitoring to allow the Discharger to provide a representative generalized characterization of the subject waste for portable toilet and septage derived wastes. See also the Response to DISCHARGER COMMENT 43.

DISCHARGER COMMENT 88: For tentative MRP R5-20XX-XXXX Additional Facility Monitoring 5.D.10 – Table 40 – Regular Load Inspection, the YCCL established Waste Acceptability Procedures provide limits for allowable hydrocarbons up to 1,000 mg/l (See Appendix B of the JTD). Requiring hydrocarbon sampling at the µg/l units is excessive. Similarly, a detectible sheen may be present at the acceptance limit but does not constitute a reason for load rejection.

RESPONSE: The particular reporting units in Tentative MRP R5-20XX-XXXX Additional Facility Monitoring 5.D.10 do not represent reporting thresholds. Central Valley Water Board Staff revised the required reporting unit for Hydrocarbons to "mg/L" to align with Discharger's Waste Acceptability Procedure's unit reporting practice for Hydrocarbons. Central Valley Water Board Staff note that Tentative MRP R5-20XX-XXXX Additional Facility Monitoring 5.D.10 provides for the use of field test instruments used to measure pH, electrical conductivity, and presence of volatile gasses.

Regarding load rejection, Central Valley Water Board Staff note that the proposed language merely requires reporting of the presence of a visible sheen AND reporting of a tally of rejected loads. This information is necessary to inform the Central Valley Water Board and the Public evaluation of the efficacy the Discharger's regular load inspection procedures relating to WMU G. Nothing in the tentative MRP R5-20XX-XXXX would require the Discharger to reject a load merely because of the presence of a visible sheen. Regardless, it remains the Discharger's responsibility to comply with WDRs R5-2025-XXXX, including ensuring that at all times no hazardous wastes or otherwise prohibited wastes are discharged to WMU G regardless of the presence of, or lack of, a visible sheen on a load discharged to WMU G.

DISCHARGER COMMENT 89: For tentative MRP R5-20XX-XXXX Reporting Requirements E, Table 41 Summary of Required Reports, Semi-Annual monitoring reports are currently due 15 August and 15 February in MRP R5-2016-0094. We request that the due date remain the 15th. The annual monitoring report is 15 February in MRP R5-2016-0094. We request that the due date remain the 15th. The annual facility inspection report (the Winterization Report) is due 1 December in MRP R5-2016-0094. We request that the due date remain 1 December. Financial assurance reports are currently required to be submitted to CalRecycle by 28 August each year which allows sufficient time to complete the annual site survey by 1 July and analyze the results. We request the same due date.

RESPONSE: Central Valley Water Board Staff made the following revisions to tentative MRP R5-20XX-XXXX Reporting Requirements E, Table 41 Summary of Required Reports:

- Revised the semi-annual reporting due date to 15 August and 15 February;
- Revised the annual reporting due date to 15 February;
- Revised the annual facility inspection report (the Winterization Report) due date to 1 December;
- Revised the deadline to submit the financial assurance report to 1 September, annually (See also Response to DISCHARGER's COMMENT No. 56)

DISCHARGER COMMENT 90: For tentative MRP R5-20XX-XXXX Reporting Requirements E.1, Semiannual Monitoring Reports (SMRs), refer to DISCHARGER'S COMMENT NO. 89.

RESPONSE: See Response to DISCHARGER'S COMMENT NO. 89.

DISCHARGER COMMENT 91: For tentative MRP R5-20XX-XXXX Reporting Requirements E.2, Annual Monitoring Reports (AMRs), refer to DISCHARGER'S COMMENT NO. 89.

RESPONSE: See Response to DISCHARGER'S COMMENT NO. 89.

DISCHARGER COMMENT 92: For tentative MRP R5-20XX-XXXX Reporting Requirements E.4, Annual Facility Inspection Report, the County completes its annual survey on 1 July each year. To provide sufficient time for analysis, we request that the next iso-settlement map be submitted on 30 September 2026.

RESPONSE: Central Valley Water Board Staff revised tentative MRP R5-20XX-XXXX Reporting Requirements E.4, Annual Facility Inspection Report to require that the next iso-settlement map be submitted in 30 September 2026.

DISCHARGER COMMENT 93: For tentative MRP R5-20XX-XXXX Reporting Requirements E.7, Financial Assurances Report, revise the deadline for reporting to 1 September, annually (See also DISCHARGER's COMMENT Nos. 56 and 89).

RESPONSE: Central Valley Water Board Staff revised tentative MRP R5-20XX-XXXX Reporting Requirements E.7, Financial Assurances Report to require report submission by 1 September, annually.

NORTHERN RECYCLING, LLC COMMENT 1: Page 67 of the tentative WDRs lists two stormwater sampling points that are discharge points from Compost Facility 2 (SW-4 & SW-5) that are considered storm water, meaning the flows do not come from any area where composting or curing are occurring. Runoff flowing from composting or curing areas are considered wastewater and those flows are retained in lined wastewater ponds.

Note that Compost Facility 2 does not discharge to waters of the United States, but rather to a storm water retention basin that also receives storm water from other operational areas of the landfill. The YCCL provides a variety of services and includes a number of operational areas, including two compost facilities. SW-4 & SW-5 seem to be the only storm water sample points that are interior to the landfill and do not discharge off-site. Northern prefers, and has discussed with YCCL staff, that storm water quality from discharges from Compost Facility 2 be managed contractually between Yolo County and Northern.

RESPONSE: See Response to DISCHARGER'S COMMENT NOS. 33 and 68.

NORTHERN RECYCLING, LLC COMMENT 2: If the storm water sampling points SW-4 & SW-5 are excluded from mandatory testing under the WDRs then the following comments on the Monitoring & Reporting Plan don't apply with respect to Compost Facility 2 but may still apply to the YCCL.

RESPONSE: Central Valley Water Board Staff believe the elimination of "SW-4 & SW-5" for the reasons described herein (see Response to Discharger's Comment No. 33)

resolves the matter. Notwithstanding, Central Valley Water Board Staff prepared responses to each of Northern Recycling, LLC's comments.

NORTHERN RECYCLING, LLC COMMENT 3: For tentative MRP R5-20XX-XXXX, Detection Monitoring Program B.3.b – Sample Collection and Analysis, the statement that samples shall be taken any time there is surface water present seems ambiguous. What does that mean? Sample every day that there is a discharge? Table 13 has a list of constituents that must be tested for at "every storm event"; again, how is that defined? Is a storm event any precipitation event that produces runoff at a storm water sampling point? How long between storm events to judge that one event has ended and another has begun? I don't see a definition.

RESPONSE: Refer to the Response to DISCHARGER COMMENT NO. 69.

NORTHERN RECYCLING, LLC COMMENT 4: For tentative MRP R5-20XX-XXXX, Detection Monitoring Program B.3.b – Table 14, Surface Water Monitoring, Constituent Parameters, which lists 12 constituents to test for at Major Storm Events, the list of constituents for testing is considerably longer than what is required by the Storm Water Industrial General Permit (SW IGP) for compost facilities, and as such, it seems excessive for flow from Compost Facility 2. It seems as if Compost Facility 2 is being required to test for the list of constituents that are required for the entire landfill at sample points where YCCL runoff is discharging off-site to waters of the United States. That seems to also be true for the constituents in Table 15, Surface Water Five Year COCs.

RESPONSE: The tentative WDRs would regulate the Facility's landfill WMUs, surface impoundment WMUs, composting operations listed in tentative WDRs Table 1, corrective action requirements, and related Facility activities (See Finding 7). Certain Facility activities Facility onsite features, systems, and structures, including Compost Facility #2, are described in Finding 12. Refer also to the Response to DISCHARGER COMMENT NO. 69

NORTHERN RECYCLING, LLC COMMENT 5: compost facilities: pH, TSS, O&G, Fe; N+N; Pb; Zn; and P.

RESPONSE: Refer to the Response to DISCHARGER COMMENT NO. 69.

NORTHERN RECYCLING, LLC COMMENT 6: Tentative MRP R5-20XX-XXXX, B.4.h Concentration Limit states: *The Concentration Limit for each COC is the "background concentration," as determined by the statistical methods outlined in subdivision (e)(8) of Title 27, section 20415.6 (Title 27, § 20400, subds. (a), (b).)*

This doesn't distinguish between surface water and other sampling points. It seems to be addressing groundwater & vadose zone monitoring. Would the "concentration limits" for discharge from SW-4 & SW-5 be based on the Numeric Action Levels (NALs) from the SW IGP, instead? A footnote states: *Concentration Limits are initially proposed by the discharger, then reviewed and approved by the Central Valley Water Board (subject to any necessary revisions).* Is it correct that Yolo County is to propose surface water concentration limits for the constituents listed in Tables 13, 14 and 15 (Table 15 references constituents presented in Attachments)? Again, the list seems excessive

when applied to a compost facility with discharge points that simply flow to the landfill storm water retention basin.

RESPONSE: In general concentration limits apply to “each medium (under Title § 20415, including groundwater, surface water, and the unsaturated zone) monitored pursuant to Title 27 § 20415 (See Title 27 § 20400). Title 27 requires that for each surface water body that the Central Valley Water Board establish a detection monitoring program which provides the best assurance of the earliest possible detection of a release from a WMU (Title 27 § 20415 (c)(2)(B). Refer also to the Response to DISCHARGER COMMENT NOS. 26 and 72.