CENTRAL VALLEY REGIONAL WATER QUALITY CONTROL BOARD
20 JUNE 2025 BOARD MEETING

RESPONSE TO COMMENTS
FOR
SAN JOAQUIN COUNTY DEPARTMENT OF PUBLIC WORKS AND FOOTHILL SANITARY, INC.
FOOTHILL SANITARY LANDFILL
TENTATIVE AMENDING WASTE DISCHARGE REQUIREMENTS

In an 8 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 Foothill Sanitary Landfill in San Joaquin County with the intent of consideration by the Central Valley Water Board at a public hearing held on 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 8 May 2025 to receive full consideration. Timely comments were received from San Joaquin County Department of Public Works and Foothill Sanitary, Inc. (Discharger) on 29 April 2025. Written comments are summarized below, followed by responses from Central ValleyWater Board Staff.

Central Valley Water Board Staff also made changes to the tentative WDRs and Attachment to improve clarity. Clarifications of note in the tentative WDR Order R5-2025-XXXX are that staff removed language regarding the operative MRP accompanying this Order. An operative MRP will be issued prior to waste placement. Clarifications of note in Attachment 1 include changes and additions to language and requirements associated with the Water Quality Protection Standard requirement, a submittal of an updated water balance for the proposed surface impoundment, information sheet update, fix Finding numbering, and fix typographical errors.

DISCHARGER'S COMMENTS

DISCHARGER COMMENT 1:

County staff support the addition of a Class II surface impoundment.

RESPONSE:

Staff note this comment.

DISCHARGER COMMENT 2:

As submitted, the discharge of LFG Condensate from LF-1 is prohibited (A.3.b and B.9.b). Further section B6 requires that condensate be discharged at an offsite facility. The continuation of these requirements under circumstances where the County is investing significant funding is found to be inappropriate and staff request that they be revised or deleted. Provision for discharging condensate into the basin must be provided. If the

inclusion of this provision requires other restriction on the discharge of liquid from the basin, this could reasonably be included as a conditional restriction. For example, rather than a total prohibition of LF-1 condensate from the basin, the requirement could be revised to state simply that: “In the event the County discharges condensate from LF-1 into the basin, no liquid comingled with such condensate maybe reinjected into any waste management unit”.

RESPONSE:

Finding 82 and 83 were updated to include language that leachate and landfill gas condensate can be discharged in the proposed Class II surface impoundment.

Finding 84 has also been updated to state that landfill leachate derived from LF-2 modules can continue to return to LF-2 modules as long as the leachate is not comingled with LF-1 LFG condensate.

Finding 85 has been updated to clarify that an operations plan is required to appropriately discharge LF-1 LFG condensate to an authorized Class II surface impoundment.

Section B.5 has been updated to include discharge of leachate and LFG condensate to the proposed surface impoundment. Section B.6 specifies that leachate and LFG condensate derived from LF-1 can be discharged to an authorized Class II surface impoundment.

Section B.9.b has been updated to reflect the change that landfill gas condensate from both LF-1 and LF-2 will be allowed to discharge into the surface impoundment.

Section B.9.b.ii. has been updated to describe that if landfill gas condensate from LF-1 is discharged to the Class II surface impoundment, then the liquid waste can not be used for reinjection at any waste management unit.

Section B.6 and C.2 has been updated to remove language regarding off-site disposal of LF-1 LFG condensate.

DISCHARGER COMMENT 3:

The County currently operates two active and two closed landfills. Each generates varying quantities of condensate while the active landfills also generate leachate. While the proposed basin is sized to manage the volume of leachate previously removed from Foothill Landfill, it can be reasonably expected that the basin will frequently have available capacity. Therefore, it is vital that the County be provided the flexibility to utilize that capacity as provided in section B.10.

RESPONSE:

Section B.9 has been updated to include the possibility of off-site discharge to the Class II surface impoundment for leachate and LFG condensate. At this time, the Discharger is not authorized to dispose of liquid wastes generated off-site in the

proposed surface impoundment. Section B.10 has also been updated to fix a typographical error and to clarify the prohibition's liquid waste to be "on-site created leachate and LFG condensate."

DISCHARGER COMMENT 4:

Finally, it should be noted, that the County is currently underway on making substantial changes to the operation of Foothill Landfill. These changes will likely precipitate further revisions to the WDR's in coming years.

RESPONSE:

Staff note this comment.