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April 29, 2025

Mr. Brad Shelton, PG
Senior Engineering Geologist
Central Valley California Regional Water Quality Control Board
11020 Sun Center Drive, #200
Rancho Cordova, California 95670

SUBJECT: TENTATIVE WASTE DISCHARGE REQUIRMENTS FOR FOOTHILL LANDFILL

VIA EMAIL ONLY – NO PAPER COPY

Dear Mr. Shelton:

The County has been working with Board staff for over a year to formulate a plan to address the needs to better handle leachate and condensate at Foothill Landfill. Following multiple discussions, proposals and submittals we achieved general consensus on the size, location and associated facilities for a new basin to receive and dispose of excess liquids. To facilitate the actual implementation of the plans however required revisions of the existing Waste Discharge Requirements (WDR's). To this end, Board staff prepared Tentative WDR Order R5-2025-xxxx Amending WDR Order R5-2015-0058. A copy of the Tentative Order, attachments and Notice of Public Hearing were received by the County April 14th 2025.

Following are the County's Comments to the proposed revised WDR's.

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

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”.

3. The County currently operates two active and two closed landfills. Each generate 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.

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.

In conclusion, staff support the proposal with the modifications and adjustments outlined above. County Staff appreciate the collaborative approach that board staff have exhibited throughout this process.

Sincerely,

Mark Houghton

Mark Houghton, P.E.

Senior Engineer

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c: Bryce Howard – Integrated Waste Manager