

Response to Comments

Comment Deadline: September 11, 2020 by 5:00 p.m.

Draft Waste Discharge Requirements (WDRs) and Monitoring and Reporting Program (MRP)

Order R7-2020-0016

Cushenbury Plant Landfill

Imperial County

Changes proposed in response to verbal comments made on 09/02/2020 are described below and incorporated into a redline that is available upon request. Please contact Zakary Owens at (760) 776-8962 or Zakary.Owens@waterboards.ca.gov for a copy.

| Verbal Comment # | Date | Commenter | Affiliation |
|------------------|------------|----------------------------------|-------------|
| David Rib (D.R.) | 09/02/2020 | David Rib, Environmental Manager | Discharger |

| ID | Comment | Response |
|----------|---|--|
| D.R.-1.1 | Footnote 7 and several findings in the Draft WDRs suggest that the refuse from employees is no longer accepted into the landfill, and that it is taken off-site for final disposal. This is not accurate; the employee lunch and other Municipal Solid Waste is disposed of at the Facility, as has historically been done. | <p>The Regional Water Board will revise the Draft WDRs to reflect the new information received.</p> <p>Finding 2 will be revised as follows:</p> <p>“The Facility site contains a cement manufacturing plant and consists of cement processing equipment and associated structures, cement and rock storage areas, railroad and truck transfer facilities, office buildings, and the landfill. The landfill is an active, <u>Class III waste management unit</u>¹ that encompasses a total of 15 acres.”</p> <p>Finding 11 will be revised as follows:</p> <p>“The Facility property is privately-owned and the landfill waste management unit is <u>primarily</u> for the disposal of solid, inert waste generated by the Discharger during the cement manufacturing process...”</p> <p>Finding 22 will be revised as follows:</p> <p>“LF-1 receives the following Class III, nonhazardous <u>municipal solid waste</u> and inert solid wastes:</p> <ol style="list-style-type: none"> a. Refuse consisting of wastepaper, wood pallets, tree trimmings, steel, rubber, miscellaneous trash from the Facility, and less than 1% of incidental miscellaneous materials including <u>municipal solid waste</u> from employees' lunches;” <p>Footnote 7 will be deleted from the Order as requested.</p> |

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| | | <p>Finding 23 will be revised as follows:</p> <p>“LF-1 is unlined and has no Leachate Collection and Recovery System (LCRS). The formation of leachate at this site is not expected because <u>primarily</u> inert material <u>is disposed of</u> within the footprint. Furthermore, any generation of leachate or stormwater infiltration is limited by the arid climate...”</p> |